PE2110/F: Protect wild wrasse stocks

Petitioner written submission, 17 December 2024

I write in response to the Scottish Government's submission ('the submission'), dated 4 December 2024, which addressed two questions in the Committee's letter of 8 November 2024.

Total Allowable Catch Limits (TAC)

In the submission, the Scottish Government stated there are inherent difficulties in setting TAC because wrasse are landed live, and hence require handling, as well as "practical difficulties … due to the characteristics of the fleet and onboard operations". SIFT does not accept these difficulties are sufficient to justify the absence of a TAC.

Gathering information from fishers is standard practice; key information includes the number of boats licensed, the effort (e.g. the number of traps) and an analysis of all fish trapped. This data could readily be gathered in the wrasse fishery. However, the Scottish Government only requires fishers to report the total number of wrasse, by species and per ICES rectangle (at 30 Nautical Miles square, a large area for a fishery of this nature), landed (but not 'trapped') for each trip in each week and to sample only the first 20 traps deployed each week - (a fisher may deploy up to 250 traps at a time). Unsurprisingly, there is no guarantee that the first 20 traps hauled are representative of the full catch. Furthermore, full data on effort is not gathered (there is no requirement to record the number of traps deployed). So, even if there were comprehensive catch data, it would be worthless for setting TAC in the absence of full effort data.

The Scottish Government also stated that "stock structure for each wrasse species is unknown… [and]... localised, individual assessments and limits would need to be applied in each area for each species." This claim is only correct if population units are small and local. If population units are large, then localised individual assessments are inappropriate. In other words, it is necessary to understand the population structure in order to properly assess stock. The fact that the stock structure of wrasse species is unknown (as the Government acknowledges) is precisely why there should be additional assessments undertaken. If these assessments incur a cost, then this could be borne by the commercial organisations which choose to exploit this publicly owned resource.

Furthermore, the mandatory installation and use of Remote Electronic Monitoring and Vessel Monitoring Systems to provide fishery managers with more comprehensive data on the nature, time and location of fishing activity should be required. It is unclear why fishery managers do not do so given they have that power in wrasse fishery licence conditions and do so in other fisheries (e.g. razor clams).

Lastly, the Scottish Government stated that there are "suboptimal consequences of establishing a catch limit for wrasse stocks. Catch limits imposed there [Norway] have resulted in …. fishers seek[ing] to maximise effort and land as many fish as possible before the overall limit has been reached. This resulted in the fishery closing part way through the season which can be problematic as landed wrasse are

a live fish and to be most effective should be available when sea lice are found on salmon farms".

We do not accept this response, because firstly: a daily or weekly catch limit could be set to prevent all the fishing effort taking place at the start of the fishing season. Secondly, aquaculture facilities can keep trapped wrasse alive until needed. Importantly, the statement also demonstrates how the demands of the salmon farming industry dictate the timing of the wrasse fishing season (i.e. the season is more influenced by when sea lice infestations are worst, rather than when the breeding season occurs). The failure to take adequate account of wrasse life cycles appears to conflict with the Fisheries Objectives of the UK Fisheries Act 2020.

Discussions between Scottish and UK Governments on Fisheries Management Plans

We note the submission did not provide substantive information on any discussions between the Scottish and UK Governments regarding a wrasse Fisheries Management Plan (FMP). We infer from this that no material discussions have occurred.

Furthermore, we question the Scottish Government's claim to be "alive to developments in academic literature" given its failure (over four years) to take into account the research by Glasgow University, conducted for NatureScot, which underpinned Ministers' obligation to undertake Habitat Regulations Assessments for wrasse fisheries within Special Areas of Conservation (see below).

Finally, the submission states that the unpublished Glasgow University report was received by Scottish Government in 2024, and not in 2020, as per my 28 October submission. I understood the report had been received by Scottish Government in 2020, because that is when it was received by NatureScot, a Scottish non-departmental public body (NDPB). I apologise for any confusion this caused but note that information of the importance in the report, when held by an NDPB, should surely be made available to, and utilised by, Marine Directorate when making relevant policy and licensing decisions. Furthermore, and importantly, I draw the Committee's attention to PQ S6W-12866 from Rachael Hamilton MSP, answered in 2022, which asked "… the Scottish Government, in the light of recently released evidence from NatureScot showing that wrasse is a typical species of rocky reef habitats, …" The evidence referred to in this PQ is the report that the Minister stated that she did not receive until 2024. SIFT believes it is implausible for Ministers to answer a question referring to a specific piece of evidence and subsequently claim they did not know of the evidence or its implications.

In summary, SIFT believes that the submission highlights the omissions in the existing management of the wrasse fishery regarding data gathering, TAC setting, dependence upon scientific literature and the need for an FMP. This clearly shows the need for a comprehensive Fishery Management Plan for wrasse species to ensure that further management failures are avoided, the sustainability of sensitive ecosystems and the fishery ensured, and that the fishery is finally brought into compliance with the Sustainability, Precautionary, Ecosystem and Scientific Evidence objectives of the UK Fisheries Act 2020.