NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Rural.committee@Parliament.Scot

28 February 2025

Dear Sir / Madam

We are writing in response to the recently published Rural Affairs and Islands Committee report of the follow-up inquiry into salmon farming and in particular to paragraphs 137-141, and the specific request for clarification contained in recommendation 140.

This recommendation relates to a research project that we commissioned from the University of Glasgow in August 2019 and received a final draft in March 2020. This study used a combination of methods to: a) explore wrasse abundance in a typical site on the Scottish West Coast; b) understand the associations of wrasse species with particular habitat types and; c) suggest the most appropriate methods to monitor changes in wrasse species abundance. It is important to note that this was not a study into the impact of wrasse fishing on protected sites.

Whilst we acknowledge and regret the long delay in publication of this report (which has been related to staff capacity issues), we strongly refute the suggestion that the delay in publishing the report has impacted on our advice to Marine Directorate on wrasse fishing or been a primary factor in the approach taken to assessing the impact of the fishery.

We attach a submission dated 30 August 2024 to Environmental Standards Scotland which sets out a clear timeline of our engagement on wrasse fishing during the period from January 2017 to August 2024. This highlights the development of Marine Directorate's approach in managing the fishery - moving from initial voluntary controls, to mandatory controls, and on to conducting Habitats Regulations Assessment.

During this time, we have been clear on the need for formal management measures to ensure the fishery is sustainable (including mitigating the potential impact on Natura features, the MPA network and relevant PMFs) (e.g. Para 11 in our 2018 advice to the ECCLR committee salmon farming inquiry). Although there are still issues in obtaining data at a scale relevant to the MPA network, we greatly welcome the recent moves towards greater spatial information on the location and intensity of fishing.

We are currently liaising closely with SG Marine Directorate colleagues to provide our HRA advice on the fishery, and we are re-prioritising work to progress the publication of the University of Glasgow report.

We hope this answers the Committee's questions, but we would be happy to clarify any further points on request.

Yours sincerely,

CATHY TILBROOK

Head of Sustainable Coasts & Seas

NatureScot
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

Senior Investigations Officer
Environmental Standards Scotland

30 Aug. 2024

Provision of Information to Environmental Standards Scotland (ESS): Wrasse Fishing Activities – Case Reference IESS.24.029

Thank you for your letter of 18 July and our subsequent discussion on 29 July relating to the representation that ESS has received expressing concerns over wrasse fishing activities occurring within protected areas of Scotland.

Further to that discussion, I am writing to provide further information on the engagement NatureScot has had on the subject of wrasse fishing, set against the broad timeline to date.

In addition, we wish to note a correction to a statement made in your letter of 18 July which states that 'Marine Directorate confirm that an appropriate assessment is not required following advice received from NatureScot'. As highlighted at our meeting, we are clear that NatureScot has never provided such advice, and we understand that this point has also been corrected by Marine Directorate.

From our perspective the direction of travel for introducing and improving controls on the wrasse fishery relates back to a meeting with Marine Scotland (now Marine Directorate) in Victoria Quay on 27 January 2017 (ref: Note of meeting attached). This meeting covered the availability of information to inform potential management of this developing fishery. Amongst other things, this meeting recognised the need to address the knowledge gaps that existed, to inform consideration of future management measures and related assessment for a sustainable fishery.

The introduction of the 2018 Voluntary Management Measures followed, and in relation to that we provided advice (email attached) to Marine Directorate with regard to otter entrapment risk (in the context of otters as a European Protected Species and as a protected feature of relevant SACs).

Also, in February 2018 our response to the Environment Climate Change and Land Reform Committee – Inquiry into environmental impact of salmon farming in Scotland noted our support for formal underpinning of management measures for the fishery:

Para 11: 'It is clear that the development of capacity for reared cleaner fish is unlikely to meet the demand in the industry for some time. Therefore, the fishery is likely to exist for the foreseeable future and SNH is strongly in favour of formal management measures being introduced to ensure the fishery is sustainable (including mitigating the potential impact on Natura features, the MPA network and relevant PMFs)'.

In August 2019 NatureScot commissioned a report from the University of Glasgow. This study used a combination of methods to: a) explore wrasse abundance in a typical site on the Scottish West Coast; b) understand the associations of wrasse species with particular habitat types and; c) suggest the most appropriate methods to monitor changes in wrasse species abundances. We received the final draft of the report in March 2021. Regretfully, the report has not yet been published (due to delays caused by new accessibility requirements and staff capacity issues) however it is our intention to finalise publication as soon as possible this year. In the meantime, the draft has been provided on request to stakeholders and to SPICE previously. Draft of the report is attached.

In 2021 Marine Directorate introduced the mandatory measures through a licence condition to prohibit Scottish vessels from fishing for wrasse unless they hold an annual Letter of Derogation.

NatureScot was supportive of these measures as a positive step in providing a mechanism (amongst other things) to contain the number of vessels fishing and implement minimum landing sizes, while also facilitating the improvement of fishery data necessary to further assess and refine the management of the fishery.

A key issue for us has been the lack of information on the spatial distribution of wrasse fishing activity. The recently published report from July this year has presented fishing activity data from 2021 and 2022. This report is helpful in giving a more up-to-date overview of the fishery. However, the fishing activity information is collected/presented at ICES rectangle scale which means that we still lack a spatial understanding of the fishery at a scale that is relevant to protected site considerations and this has been a constraint on our ability to provide advice, including in relation to the wider ecological effects of wrasse fishing.

We are aware that MD SEDD colleagues are working to improve the resolution of current data (e.g. at a liaison meeting in February 2023 we discussed the issues/challenges around improving the resolution of spatial data for the fishery). A future requirement for the use of inshore vessel tracking, with resulting data flows, would be the most significant step that could be taken to address this issue.

Turning to considerations in the management of the interaction of creeling with protected sites and features, the following is relevant to the wrasse fishery.

There is the potential for fishing by creels to have an impact on the seabed via abrasion. The advice on fishing activities that we provide is developed on the basis of the sensitivity of features to pressures. This is underpinned by published research or the Feature Activity Sensitivity Tool (FeAST), a web-based application which allows users to investigate the sensitivity of many marine protected features (habitats, species, geology and landforms) in Scotland's seas, to pressures arising from human activities. (FeAST is currently being updated to add further features to the tool).

This feeds into the advice we provide for fishery management measures that have been (or are being) introduced across the MPA network. The advice in relation to creeling usually falls in the category of ‘reduce/limit’ which is on the basis of seabed disturbance from creels usually being dependent on the intensity of fishing.

However, certain biogenic habitats are particularly sensitive to abrasion and for these we have advised ‘removal or avoidance’. As a result, there are a small number of sites where management measures are in place to prohibit creeling – including in the Loch Sunart SAC, the South Arran MPA and the Loch Creran MPA (see here for a map of existing creel fishing prohibitions). This means that for the most sensitive habitats, there is some existing protection from fishing for wrasse with creels.

With respect to otters, there is a theoretical risk of otters being entrapped in wrasse creels, and (as mentioned above) we provided advice on aperture dimensions to mitigate the risk of otter entrapment. The licence conditions for the derogation state that 'The traps used to fish for wrasse must have otter exclusion devices, such as a fixed eye aperture at the entrance to the trap and traps must feature escape hatches', this could be considered vague as no dimensions are specified.

It is worth noting that commercially available wrasse creels are likely to have aperture sizes that are sufficiently small to prevent otter entrapment and also that creel entrapment is not thought to be causing a high mortality of otters at a protected site level or generally. Nonetheless it has been recognised that this issue would bear further evidence gathering and to that end we are in the process of commissioning a study on otter entrapment (which will look at all creel fisheries, including wrasse). The study will be carried out during the current financial year

I hope this information is helpful, and we'd be happy to discuss further as necessary.

Yours sincerely,

Dr David W Donnan
Marine Sustainability Manager
Sustainable Coasts and Seas Team