

Analysis of responses to the consultation on Proposed New Mandatory Fishing Measures for Wild Wrasse Harvesting

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Executive Summary

This document provides an analysis of responses and the outcome to the 'Wild Wrasse Harvesting: Consultation on Proposed New Mandatory Fishing Measures'. A copy of the consultation can be found at <https://www.gov.scot/publications/wild-wrasse-harvesting-consultation-proposed-new-mandatory-fishing-measures/pages/1/>.

The consultation sought views on the introduction of mandatory fishing measures by Marine Scotland to provide appropriate fisheries management of the wild wrasse fishery.

Summary of responses

There were 154 responses to the consultation. A broad cross-section of stakeholders were represented from a range of interests including fishermen, salmon farm operators, environmental groups, industry representative groups and members of the public.

Outcome

Following careful consideration of appropriate future management measures of the wild wrasse fishery, including the responses received to the consultation, Marine Scotland will move to put in place the following mandatory measures:

- The closed season will continue to run from 1st December – 1st May as proposed;
- The minimum and maximum landing sizes wrasse will be implemented as proposed, see Table 1.
- There will be controls over creels, namely: -
 - Only creels specifically designed to target and catch live wrasse and ensure their welfare will be used
 - Otter exclusion devices, such as a fixed-eye aperture, will be used at the entrance to the trap and creels must feature escape hatches
 - Creels will be lifted at a maximum rate of six metres per minute
 - Creels should not be deployed when the water temperature is >17°C
- The maximum use of 250 creels per vessel will be made mandatory.
- Fishers targeting wrasse will be required to accept observers if requested subject to operational practicalities.
- Marine Scotland will take forward the use of proportionate tracking and monitoring (REM) on wrasse vessels as part of our Future Fisheries Management policy.
- Marine Scotland will implement the new measures by introducing a licence condition requiring wrasse fishers to obtain a letter of derogation to access the wild wrasse fishery. The eligibility criteria will include evidence of a track record in fishing with creels for wrasse in the 12 months prior to 10 March

2020 and an appropriate contract with a salmon farm operator. We will work with the fishing sector and the aquaculture industry to develop a fair recruitment system to enable new entrants to the fishery and a process for considering appeals.

Introduction

The important role played by wrasse in controlling lice in salmon farms is already recognised, as cleaner fish including lumpfish and wrasse have been in use within aquaculture since the 1990's. The use of wrasse helps to keep farmed species such as salmon free from sea lice without the use of chemical treatments which can have adverse effects on the natural environment. However it is equally important to have confidence that wild caught wrasse are being fished sustainably, with effective management in place and Marine Scotland has undertaken a light touch internal review, and engaged with the SSPO and salmon farm operators in developing new management proposals.

The current voluntary measures were introduced jointly by the SSPO and Marine Scotland in 2018 to enable access to wrasse as cleaner fish for the salmon farming industry, one of Scotland's key food sectors. The measures enabled harvesting in a controlled manner with rules setting out how harvesting was to be done. Only those with a contract to supply wrasse to a farm could fish and each contract had a requirement that fishers would abide by the voluntary measures and other codes such as RSPCA Assured to ensure good husbandry and treatment of the live fish at all stages of the process. The voluntary measures included: -

- a closed season
- minimum and maximum landing sizes based on the size category of the wrasse species
- specific creels and otter exclusion devices to be utilised
- limits on the number of wrasse creels in use

This report presents an analysis of written responses to the Scottish Government's consultation paper, 'Wild Wrasse Harvesting: Consultation on Proposed New Mandatory Fishing Measures'. The consultation invited views on whether the Scottish Government should introduce mandatory measures to control the harvesting of live wrasse for the salmon farming industry.

It ran from 11th March 2020 to 10th May 2020 and attracted 154 responses from a range of interests including fishermen, salmon farm operators, environmental groups, industry representative groups and members of the public. In total there were 116 individual responses and 38 organisational responses falling into the categories as outlined in Figure 1. Further to the representation in Figure 1 those who identified as fishermen were also sub divided into three groups; those who currently fish wrasse, those who are not currently fishing wrasse and uncategorised fishermen.

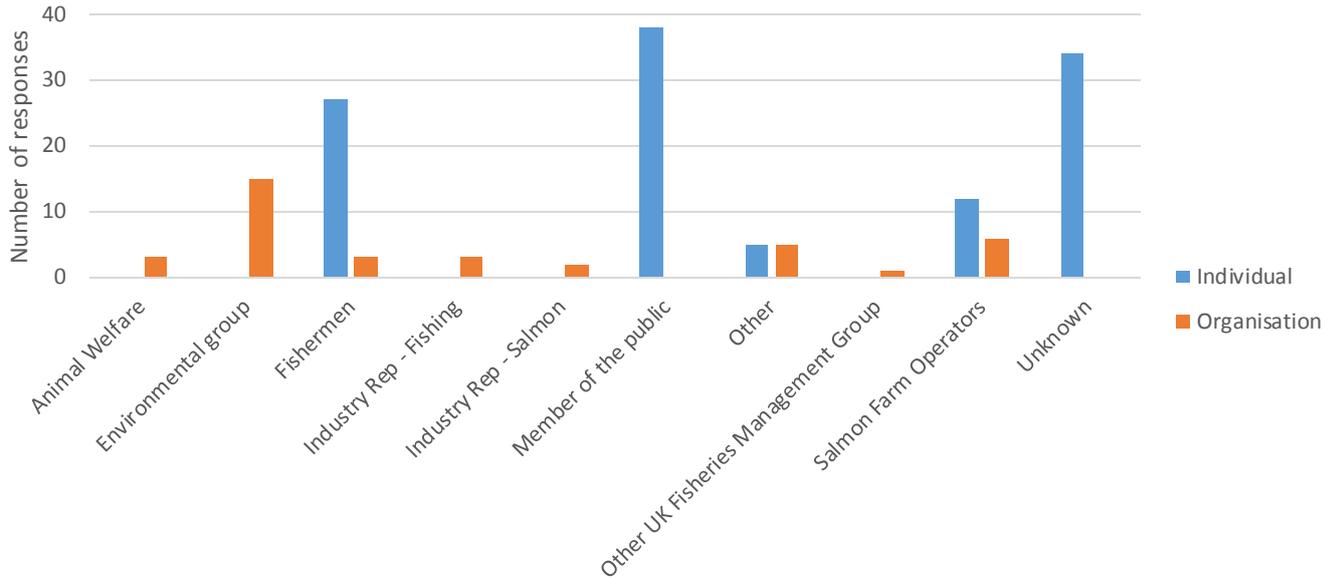


Figure 1: - Graph showing the distribution of responses to the consultation.

31% of respondents said that the consultation provided insufficient room to comment however most of these respondents did go on to make substantial and comprehensive responses.

Analysis

Proposed Mandatory Wrasse Fishing Measures (Question 1)

Marine Scotland’s proposal makes the current voluntary measures obligatory and introduces new additional mandatory fisheries management measures.

Most respondents (56%) agreed all of the proposed measures without alteration and there was very strong support (ranging from 91 – 97%) for most of the measures individually.

Season Closure

The majority of respondents (71%) agreed with the proposal that the closed season should run from December 1st to 1st May but some proposed a range of alternative dates which they felt aligned better with the wrasse breeding season. There was a wide variety of dates suggested, including full closure, with many respondents commenting that research was needed to determine the spawning cycle of wrasse in Scottish waters for a more accurate and appropriate season closure.

“It is essential that there is a closed fishing season so that wrasse are given sufficient opportunity to breed before being subject to fishing pressure. The closed fishing season needs to allow sufficient time for fish to spawn and eggs to mature and hatch.”

Community of Arran Seabed Trust (COAST)

Respondents from the salmon farming industry agreed with the dates as proposed in the consultation paper and went on to state that extending the closed season into spring would have a detrimental effect on sea lice control. There were also feelings expressed by some respondents that as wrasse are largely inactive during the winter months, there would be no benefit from fishing them for aquaculture use in these conditions.

“Restrictions applied in other jurisdictions are not applicable in a Scottish context as environmental conditions differ significantly. Extending the close season further into spring would have significant, detrimental effects on lice control.”

Anonymous

Minimum and Maximum Landing Sizes

On minimum and maximum landing sizes 90% of respondents agreed to having landing sizes in place, with the majority (77%) supporting the sizes proposed, which are shown in Table 1.

Species	Size Category
Goldsinny (<i>Ctenolabrus rupestris</i>)	Small (12cm – 17cm)
Rock Cook (<i>Centrolabrus exoletus</i>)	
Corkwing (<i>Symphodus melops</i>)	
Ballan (<i>Labrus bergylta</i>)	Large (12cm – 24cm)
Cuckoo (<i>Labrus mixtus</i>)	

Table 1: - Showing the proposed size categories per species as suggested in the consultation.

Among respondents who did not support the proposed sizes, the main concern as shown in Figure 2, related to Ballan wrasse and specifically for the minimum size to increase by 3 cm to 15 cm. This was partly to bring Scotland more into line with English regulations but also because they believe the larger Ballan wrasse survive better in the salmon tanks. An opinion held by 17% of respondents who felt wrasse have a high mortality if caught below 15cm, indicating that some salmon farms (namely Loch Duart) do not accept individuals at the smaller end of the scale for these reasons. However there is disagreement among salmon farms around the minimum Ballan size and whether lower size affects survivability.

“I fish for Loch Duart who fish solely for ballan and take nothing under 15cm. I would like to see us have some leeway at the upper end.”

Dochas Marine Ltd.

“Landing Size: I agree that there should be a minimum landing size but that size should be increased to 15cm as salmon farmers report that Ballan Wrasse have high mortality under that size.”

Anonymous

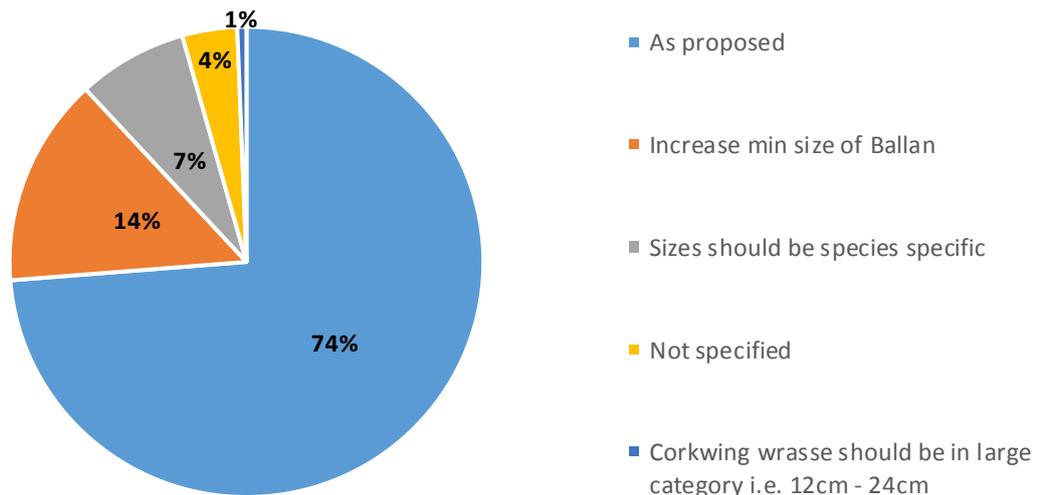


Figure 2: - Pie chart showing the spread of opinions on landing sizes from all respondents.

Specifically designed creels

Our proposal to permit only creels specifically designed to target and catch live wrasse and ensure their welfare received almost universal support, being approved by 97% of respondents. Those who disagreed didn't see the need for specialised equipment or wanted the entire fishery closed.

Otter Exclusion devices

The same substantial majority (97%) supported otter exclusion devices, such as a fixed-eye aperture, being used at the entrance to the trap and creels having to feature escape hatches. Those who disagreed were evenly split between those who felt that "carapax" creels would be enough as the entrance is too small for otters and those who wanted the entire fishery stopped.

Maximum Lift rate of 6m/min

Our proposal that creels should be lifted at a maximum rate of six metres per minute was also strongly supported by respondents (94%). The main concern respondents had with this measure related to how this would be enforced.

Creels should not be deployed when water temperature is >17°C

There was similar (92%) support for the proposed measure that creels should not be deployed when the water temperature is >17°C. A few respondents expressed that the measure felt hypothetical as the water temperature in Scotland rarely reaches this range.

Maximum of 250 creels

Our proposal that vessels may deploy a maximum of 250 creels received substantial support (91% of respondents), as shown in Figure 3 below, of which 88% of respondents felt this proposed measure was set at the correct level. Those who are displayed as 'other' contributed to the general acceptance of a creel limit although

there were mixed ideas as some felt tough restrictions would be better than none or for the entire fishery to be closed. Some in this group felt that the limits should be set by fishing area and were concerned that current demand was driven by poor management or care in salmon farms.

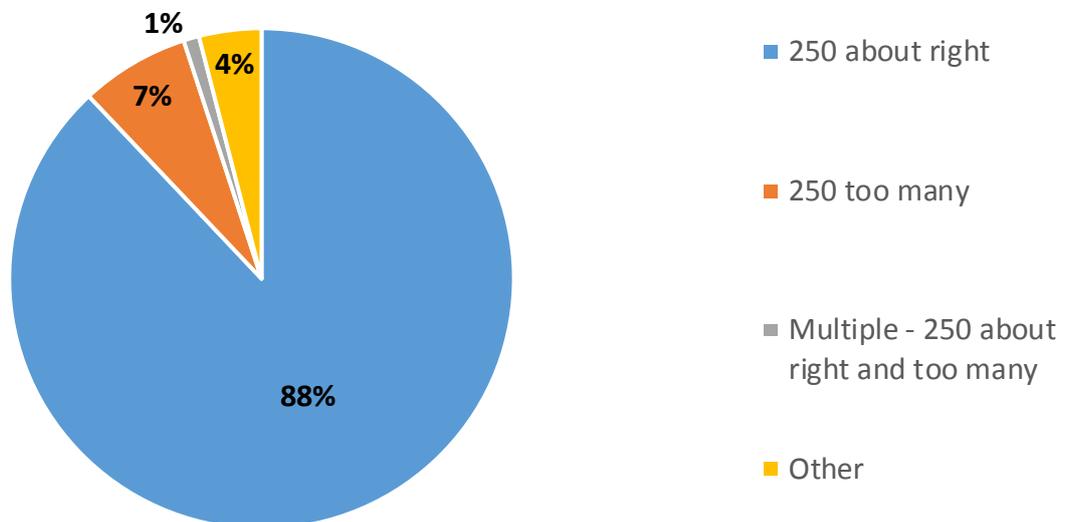


Figure 3: - Pie chart illustrating respondents' thoughts on the numbers of creels to be deployed.

"I fished last year and have a contract in place. In my opinion 250 traps/creels is adequate per vessel to ensure that this fishery is not over fished."
Anonymous Fisherman

A small minority (8%) of respondents said they were also concerned about the fishing effort connected with soak times with some leaving pots in the water too long while others were lifting pots too frequently.

Observer Requirement

A very strong majority (97%) supported the requirement to accept observers if requested and only a few objected to this measure. The main concern raised was related to the health and safety aspects of having extra people on board small vessels which already carry lots of equipment.

REM Requirement

There was also very strong support (95%) for our requirement that vessels will need to have REM or other appropriate inshore vessel monitoring if requested. Thoughts that emerged from the comments included a desire for more monitoring and that REM or similar should be made an industry standard.

A summary of the 154 responses is noted below in Figure 4. Over 90% of respondents supported all proposed measures. The exception was the closed season which was supported by 70% of respondents.

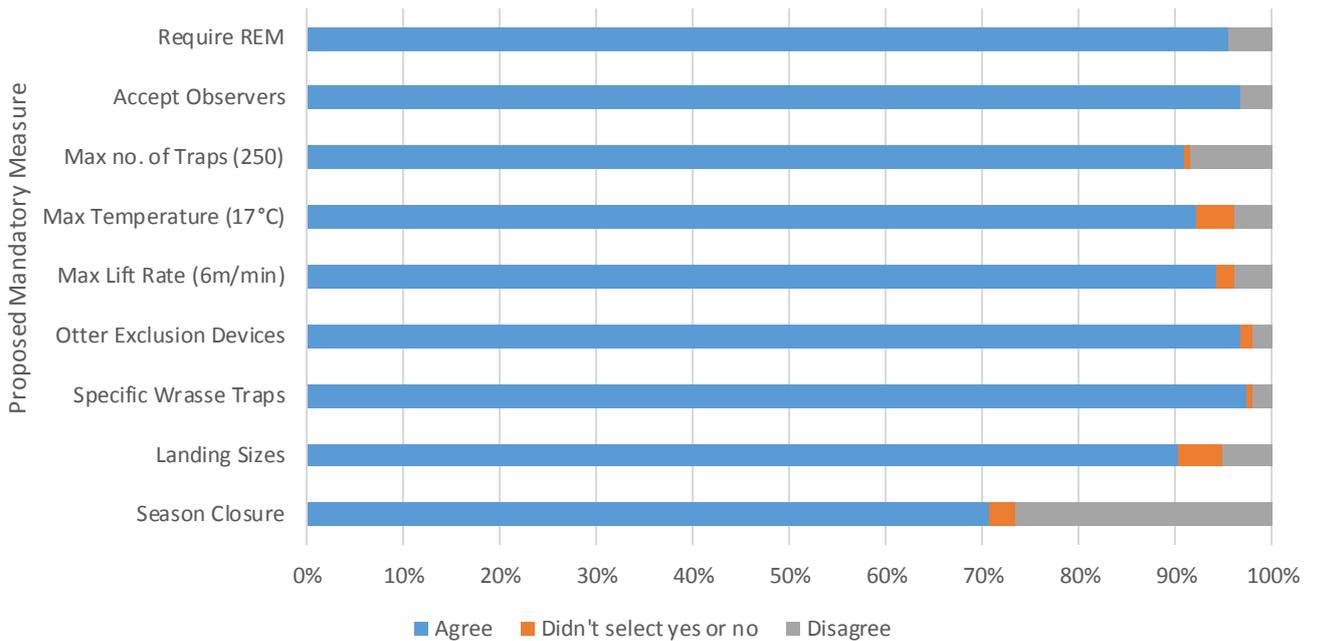


Figure 4: - Graph showing the acceptance percentage of respondents against each of the proposed mandatory measures outlined in question one.

Marine Scotland Policy Response

The proposed measures included new mandatory controls covering the reporting of wild wrasse harvesting activity, seasonal closure of the fishery, minimum and maximum landing sizes, restrictions over the number of creels vessels may use, controls over the design and deployment of creels and specifications designed to protect fish welfare and improve mortality rates. Making these mandatory would give greater control over the fishery particularly with regards to enforcement in non-compliance cases.

A key aim is to ensure wrasse fishermen provide more comprehensive information about wrasse harvesting activity directly to Marine Scotland to help improve our knowledge base and science informed fisheries management and to simplify enforcement of the proposed management measures.

We will therefore require that fishermen submit additional and more comprehensive reports of catch, and, as set out below, will introduce appropriate electronic tracking and remote electronic monitoring (REM) of participating vessels and a requirement that they accept on-board observers if requested.

Marine Scotland will put in place the following measures.

Season Closure

The closed season will continue to run from 1st December – 1st May as proposed. Ballan wrasse, the predominant species used in salmon farming, attains peak spawning in May which indicates that spawning takes place earlier in the year. Based on the limited information available across all wrasse species and the

relatively low level of wrasse landings (less than 5%) in May, the proposed closed season is appropriate for Scotland.

We recognise that there is a need for better data in this area and Marine Scotland will revisit this measure as appropriate as the science base improves.

Minimum and Maximum Landing Sizes

The minimum landing sizes were generally accepted to be reasonable although there was some support for changing individual values for some species, such as Ballan and Corkwing. We will therefore keep minimum and maximum sizes under review to aid in conservation and protect the reproductive populations of all the wrasse species. As the knowledge base improves Marine Scotland will reconsider the size restrictions as required.

Specifically designed creels

Marine Scotland will make this measure mandatory to protect wild caught wrasse during their capture, reducing stress or harm. Wrasse specific creels will also contribute to better quality of catch and should improve not only the welfare of caught wrasse but their ability to act as cleaner fish in the aquaculture pens.

Otter Exclusion devices

Marine Scotland will make otter exclusion devices mandatory to help ensure that otters will not become trapped within the creels. This will include devices such as fixed-eye apertures at the entrance to the creels, and escape hatches. We will seek advice from Naturescot on the specification of exclusion devices over the following weeks. The use of such devices is in line with current RSPCA Assured standards.

Maximum Lift rate of 6m/min

This important measure will be made mandatory as it has a direct beneficial impact on the welfare of the fish, reducing the risk of damage to the swim bladder. This measure is also in line with the RSPCA Assured standards.

Creels should not be deployed when water temperature is >17°C

Marine Scotland acknowledges this measure may be difficult to enforce however it helps reduce stress in the fish and is in line with RSPCA Assured measures and we will make it a mandatory control

Both the lift rate of 6 m/min and deploying creels when water temperature is >17°C are measures aimed at improving the health and welfare of the wrasse.

Maximum of 250 creels

Marine Scotland will make mandatory that fishers may deploy a maximum of 250 creels in harvesting wild wrasse. This creel limit is in line with existing voluntary measures to limit effort and it will be kept under review.

Observer Requirement

Vessels taking part in the fishery will be required to accept observers if requested and where operationally practicable. Primarily these will be scientific observers to obtain biological data about the fish caught and inform population management but we may also use other observers for enforcement purposes, if required. Marine Scotland acknowledges that this may require risk assessments and will liaise with each vessel to undertake this action as required.

REM Requirement

Marine Scotland will take forward the use of appropriate vessel tracking and monitoring (REM) on wrasse vessels as part of our wider proposals for inshore vessel modernisation under our Future Fisheries Management policy.

Proposed Criteria for the award of Wrasse permits (Question 2)

A key part of our new proposals for harvesting wild wrasse is that there will be mandatory controls brought into effect by a permit-style authorisation. To obtain such permission fishermen will need to be able to demonstrate their eligibility, i.e. a proven track record of wrasse harvesting and submitting returns over the last two years, and evidence of an appropriate contract with a salmon farm operator to supply wrasse. Those eligible will be able to apply for permission to harvest wild wrasse.

All fishermen currently supplying wrasse must be under contract with a farm and the contract binds them to the voluntary measures. This is to ensure that the wrasse caught are used appropriately and caught with the appropriate welfare practices to ensure they are in the highest condition possible to act as cleaner fish for aquaculture businesses.

There were mixed opinions for the proposed criteria with only 46% of respondents agreeing to all of the proposed eligibility criteria without alteration.

Permit Requirement

Taking each part individually showed that there is strong support for some form of permit scheme with 86% of respondents in agreement.

“There must be complete monitoring and tight controls on permits. ... The demand from the industry will increase but this demand must not allow the precautionary principle to be ignored.”

Anonymous

Across respondents 12% noted that they wanted strict control by Marine Scotland in relation to the wild wrasse fishery, this included calls for those found not abiding by the rules to have their permit revoked. The strongest concern in this respect was in connection with other non-permitted vessels selling to permitted vessels in so called “wrasse deals” which would undermine the management measures.

In terms of limiting the number of vessels who would be allowed access into the fishery, respondents on average (68%) felt that the permit numbers were currently at the right level.

Salmon Contract Requirement

The requirement to have in place a contract with a salmon farm was agreed by 73% of respondents. Across all respondents 19% were concerned about the welfare of wrasse in general and 36% were concerned for the sustainability of wild wrasse fishing both in an ecosystem context and through levels/rate of harvesting. Both of these groups mainly consisted of environmental groups and members of the public although there was representation from every group. Currently each salmon contract has a requirement that fishers abide by the voluntary measures and other codes such as RSPCA Assured to ensure good husbandry and treatment of the live fish at all stages of the process. This requirement also provides an end destination for the wrasse caught.

“I feel that a contract to supply is the minimum entry for the wrasse fishery. Having a defined supply to a farm shows an end market for the product (wrasse)... and means that all fisherman will be mandatorily managed under a single system, which in the past has been voluntary and lacking robustness.”

Loch Duart Ltd.

A contract with an aquaculture company ties fishers into a price structure over which they have no control.”

Orkney Fisheries Association

Track Record

The requirement to have a two year track record, returned a fairly even split and respondents were marginally against this criterion with only 47% supporting it. Track record will be determined by those who fish using creels, have recorded wrasse in their landings over the last two years and are in possession of a valid UK fishing licence.

Responses reflected a range of concerns about track record. Fishermen not currently fishing for wrasse showed they were 55% against the criteria for the permits. Generally this was because they would be prevented from getting the required permission and thus diversifying into the fishery themselves, either through their concern about not having a salmon contract currently or a demonstrable two year track record. There was also some concern that the fishery would become a closed shop with only existing wrasse fishermen being able to participate.

“The stipulation of a 2 year track record means that those fishermen who are already in the fishery become part of a closed shop of wrasse fishermen. Those are fishermen who have been favoured already by companies and there is no provision for new entrants or others who may want to enter this fishery.”

Orkney Fisheries Association

Respondents who were identified as salmon farm operators also expressed concerns about the two year track record requirement as it might hinder efforts to

recruit new suppliers, should they be needed. Specifically 78% of salmon farm operators thought that the length of two years for a track record was correct but that this should not be limited to wrasse as the fishery was originally set up as a diversification option, instead opting for two years in any fishery to allow access for new entrants. Respondents' views on the length of the track record period regardless of their position on whether it should be part of the criteria for eligibility are displayed in Figure 5.

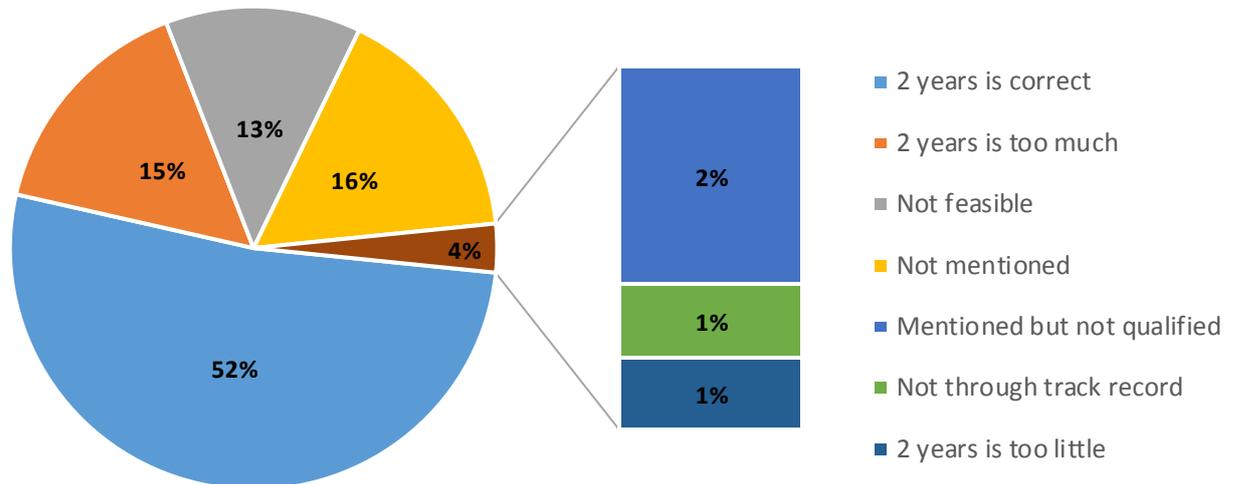


Figure 5: - Pie chart illustrating respondents' views on length of track record, should it apply.

"I don't think it should be track record based. As we have seen the effects of track record based fisheries before. It should be based on the total area of available wrasse ground. This would be achieved using VMS and existing wrasse fleet, with additional vessels on trial areas. Not too many boats in one given area, (small areas within a fisheries area) A restricted total number of creels for a fisheries area, Shetland, Orkney, North coast, etc."

Anonymous

New Entrants

The eligibility criteria with regards to new entrants was fairly split amongst respondents as seen in Figure 6. Those who wanted new entrants to be considered sought to stress the local benefit of the fishery and that this would in turn ease the pressure on other stocks such as crab and lobster. Those who did not want new entrants to be considered generally did so on the grounds that they didn't want it to turn into a "free for all" and had concerns for the future of the fishery with some respondents requesting that the current level of those fishing wrasse should be kept as is or reduced until more research could be done to evaluate the stock(s) limit(s).

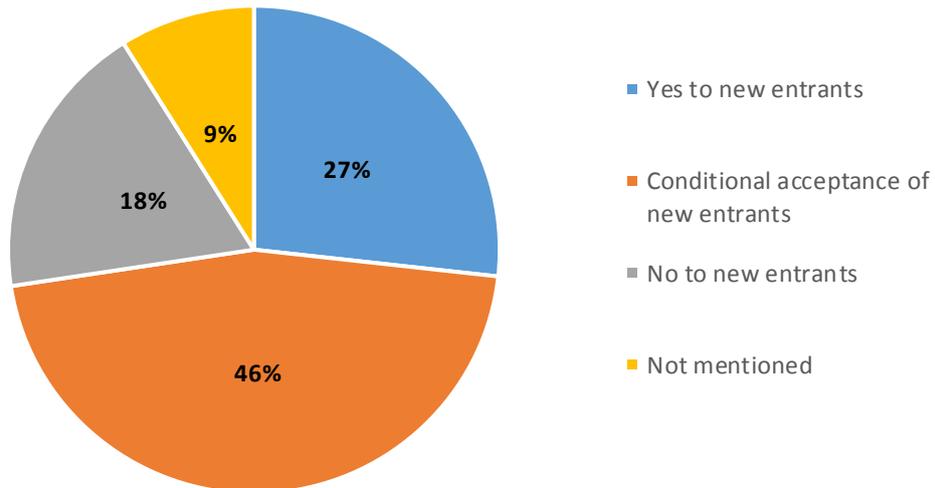


Figure 6: - Pie chart illustrating respondents' views on new entrants.

Many respondents included a range of conditions that they wished to be considered regardless of their stance on new entrants. These included: -

- change the number of permits depending on the stock health and through appropriate management to gauge how many permits should be distributed as flexible and employ proactive management;
- only allow new entrants when others leave the fishery, thus avoiding any sudden rise in fishing effort;
- for a specific area limit how many permits can be active in that area, judging on space available, the population dynamics and profitability;
- have a maximum number of permits per season and distribute these as required each year. This could also mean that if breaches occurred this could be taken into consideration when the next fishing season comes around. Thereby providing an extra incentive for those involved to follow the permit conditions carefully as loss of the permit would stop their ability to operate.

“I feel that new entrants to the fishery, particularly those who previously stated an interest to Marine Scotland, should be granted permits. Some fishermen have been unable to sell wasse due to a constricted market, being controlled by a narrow range of buyers. One year’s figures should be sufficient in this new fishery, to prove intent.”

Anonymous

“Allowance must be made for new entrants into the fishery who have recently bought vessels and can demonstrate that they have discussed a supply contract with a salmon farming company, preferably at local level. No value should become attached to any permit and they should be non-transferable with the sale of a vessel.”

Western Isles Fishermen’s Association (WIFA)

“The Scottish Government should consider other factors, such as each prospective license-holder’s history of compliance and if there are examples of non-compliance, licenses should not be awarded. The criteria should also seek to ensure that

participants in the fishery operate in such a way as to protect the fishery's contribution to the local economy. ... new licenses should only be issued within a framework that safeguards against overcapacity in the fishery."

Anonymous

"The issuing of permits will have the effect of attaching price to wrasse permits and escalation in value of permits will be inevitable. The result will be permits becoming too expensive for new entrants and even moving out of the hands of active fishermen."

Orkney Fisheries Association

Conversely, a number of comments from environmental groups advised strongly against opening up the fishery to everyone and this view was supported by existing wrasse fishers who felt this would lead to overfishing and competition for ground. It was further noted by these groups that instead of being an opportunity to take pressure off shellfish stocks such as crab and lobster, allowing too many new entrants would very quickly devastate the wrasse fishery as a whole and render it unstable in the medium to long term.

A summary of the 154 responses is noted in Figure 7 below.

Over 70% of respondents supported all proposed eligibility criteria. The exception was the track record requirement which was agreed by 47% of respondents. In Figure 7 it was noted that those who were in favour of new entrants under a condition were agreeing that new entrants should be considered.

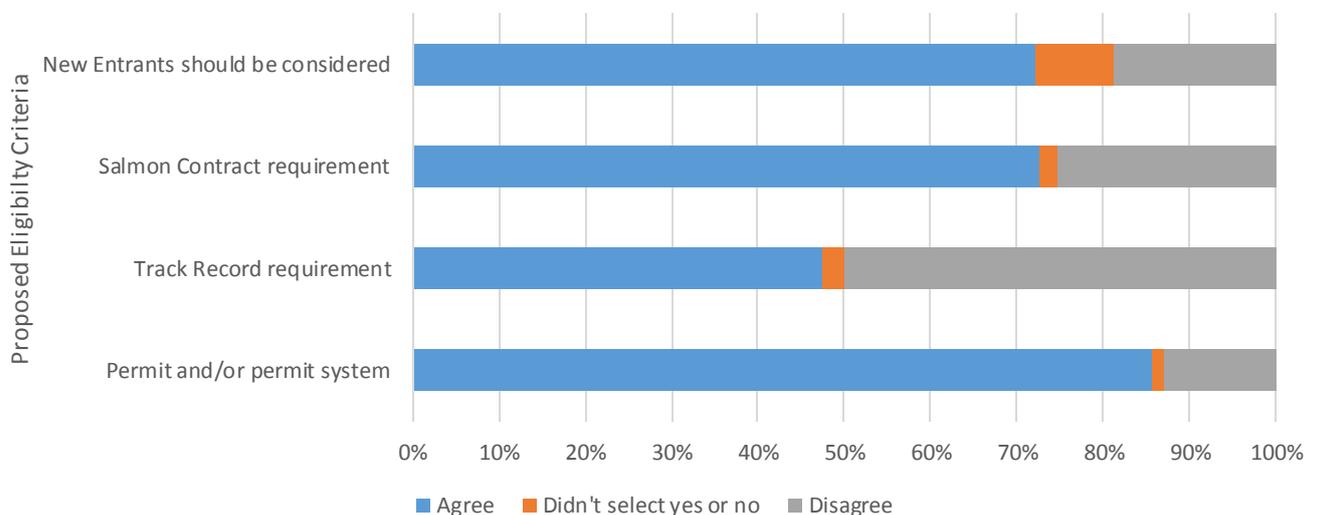


Figure 7: - Graph displaying respondents' agreement with the proposed eligibility criteria and whether new entrants should be considered as outlined in question two.

Marine Scotland Policy Response

Marine Scotland will put in place mandatory controls over the wrasse fishery. Under the new arrangements, we will introduce a licence variation closing the fishery to any fishermen that do not have permission from Marine Scotland to harvest wild wrasse.

To obtain such permission, fishermen will need to demonstrate that they meet certain eligibility criteria.

The criteria will include a track record of fishing for wrasse by creel and submitting catch records in the 12 months prior to 10 March 2020. Fishers will also need to provide evidence of having an appropriate contract with a salmon farm operator to supply wrasse.

Those eligible will be able to obtain from Marine Scotland a letter of derogation permitting them to participate in the fishery. The letter will also set out the mandatory controls in place, conditions under which the derogation is granted and penalties that might apply if controls and conditions are not observed. For example, derogation to fish for wild wrasse might be suspended or withdrawn if offences merit that action.

Marine Scotland will ensure there is access for new entrants to the wrasse fishery and will work with the fishing sector and the Aquaculture Industry to develop a fair recruitment system that takes into account sustainability and the aspirations of fishermen who may wish to diversify. There will also be an appeals process for those who consider themselves eligible. These systems will be kept under review and we will look to refine them as more evidence, data and technology becomes available.

Each salmon contract currently has a requirement that fishers abide by codes such as RSPCA Assured to ensure good husbandry and treatment of the live fish at all stages of the process and it provides an end destination for the wrasse caught.

Marine Scotland letters of derogation will be issued at the beginning of each season and Marine Scotland will keep the overall numbers of derogations under review as more information on the health of wrasse stocks becomes available. These will be valid for one fishing season and will be reassigned each year.

General Comments and Observations

The consultation sought views about specific proposals to introduce mandatory control measures and the criteria which must be met to enable access to the wrasse fishery. However a number of respondents also offered a range of views about other concerns they have relating to the wrasse fishery more generally.

Further Research Concerns

Across all respondents 30% felt that further research was required in the wild wrasse fishery. This included the need to have a better understanding of the needs and complexities of wild wrasse populations with regard to spawning season, structure, behaviours, habitat, genetics etc. much of which was not within the scope of the consultation.

Salmon Farm specific concerns

Some respondents made reference to the [Scottish finfish aquaculture's Code of Good Practice](#) stating that cleaner fish should be used no more than once. This document states within [Chapter 5](#), under point 3.74 "Cleaner fish should not be

released into the wild at the end of a production cycle, but should be humanely destroyed and disposed of, or may be reused in accordance with the provisions set out in this Code.” Some respondents were keen for salmon farms to reconsider how they look after wrasse, and use them appropriately given their nature and perceived high demand within the industry as cleaner fish.

There were a few respondents who asked whether there would be limits placed on the biomass of wrasse to be harvested and through this a limit to how many cleaner fish farming companies could purchase within a given cycle per farm or farm area.

Additional Control Measures

A small minority (8%) of respondents consisting of environmental groups and members of the public stated their desire for a wrasse total allowable catch (TAC) or quota to be set at the beginning of each season. Requesting that this restriction would take the population dynamics and stock health of wrasse into account and be adjusted accordingly. 5% of respondents, mainly comprising members of the public, called for a complete ban or moratorium on the wrasse fishery.

A few fishermen noted that it would be beneficial if it would be possible to record the number of fish caught on the FISH1 form, instead of weight as is at present. This was due to the perceived difficulties in converting the number of fish to weight, as the catch is alive and excess handling would put too much stress on the fish and thus lessen their overall quality.

Diversification opportunity

The desire for the wild wrasse fishery to be used as a diversification opportunity from other stocks, such as shellfish, was represented by 19% of respondents who mainly comprised salmon farm operators and fishermen.

Closed Areas

Concerns were raised by 20% of respondents, consisting mainly of environmental groups and members of the public, about allowing any fishing in MPAs/SACs designated for rocky reefs, with some strong views that this should not be allowed. Specific areas for this included Special Areas of Conservation (SACs) where rocky reefs are protected or qualifying features and in Nature Conservation Marine Protected Areas (MPAs) in which kelp and seaweed communities are designated Priority Marine Features (PMFs) which 14% of respondents agreed with. A further 6% of respondents had concerns which encompassed looking into specific areas for wrasse fishing to be allowed; creating no take zones or isolating where the nursery grounds are and designate these as closed areas.

Marine Scotland Policy Response

Further Research Concerns

Marine Scotland agrees that it is important to improve the evidence base and the implementation of the proposed mandatory control measures will help to achieve

that, helping to inform future changes to the measures if these are required. Marine Scotland will set out in letters of derogation the reporting requirements that must be followed to participate in the fishery. These new requirements are likely to include for each species, details of specific numbers of fish caught, kept, returned and whether those returned to the sea were alive. Over time this new data will be enhanced by scientific observer activity and may include tracker and REM input, depending on the outcome of our Future Fisheries Management project.

Salmon Farm specific concerns

Marine Scotland acknowledges that practices at aquaculture sites as described above are subject to strict Food Safety standards and various codes of practice. However some interesting points were made relating to existing practices and possible future directions. For example most farm operators may destroy wrasse at the end of a salmon cycle but some re-use the wrasse following strict health protocols. These issues are not strictly within the scope of this consultation but do have the potential to reduce the demand for fresh wrasse and we will therefore discuss with industry the options for re-using wrasse in due course.

Additional Control Measures

Marine Scotland agrees that setting some form of TAC would be a good way forward and it would bring the wrasse fishery into line with many of our other fisheries. However, at the moment there is no stock assessment of wrasse populations around Scotland which makes setting a TAC extremely difficult. In the absence of detailed population data, we will continue to operate creel limits to control effort while working to improve the evidence base over time.

The completion of FISH1 forms, showing the weight of catch, is a statutory requirement and as such we do not propose to alter that form. Marine Scotland will however require that fishermen provide details of the numbers of wrasse caught in addition to the statutory requirements.

Diversification opportunity

Marine Scotland is aware that the wrasse fishery provides a diversification option from crab and lobster fisheries and that those currently involved in the fishery have been able to successfully use this opportunity. Marine Scotland will devise a system for considering new entrants to the fishery which will take into account the impact on the fishery, the requirements of the industry and the benefits of diversification.

Closed Areas

We are aware that Naturescot has recently completed some research in this area. The findings are not yet published but we will discuss this with them in due course seeking their advice about the effects of the wrasse fishery on controlled areas.

Conclusion

In May 2018 Marine Scotland and the SSPO, working together, introduced voluntary measures for the harvesting of wild wrasse. The joint approach we adopted brought control to the wrasse fishery for the first time and we kept the measures under review. After being in place for nearly two years, Marine Scotland conducted an internal review of the arrangements and we found that most of the controls were working satisfactorily. We also concluded that there was scope to improve the reporting of wrasse fishing activity and a requirement for more formal harvesting measures which would help bring the wrasse fishery more into line with other Scottish fisheries.

The move to mandatory measures was in part to assist with enforcement, providing clear instructions to those involved in the fishery, and partly to help secure better reporting of activity and data from fishermen direct to Marine Scotland.

The fishery has become an important source of income for local fishers, often in very remote parts of the coast and it is a vital source of cleaner fish for the salmon farming industry, allowing them to cut down on the use of chemicals to control lice infestations. However, access to wrasse must also take into account the impact of fishing activity on stocks.

It is therefore important to continue work in partnership with other stakeholders in managing the fishery. The fishery should not be considered in isolation and we have taken views from industry, fishermen, conservation groups and members of the public in drawing our conclusions about the management of wild wrasse harvesting.

Our proposals were put forward in the consultation because we considered them a sensible way forward and the proposals have received strong support, convincing us that our approach is the correct one. It is important to note however that we see this as a first step and that the measures will remain under review and subject to refinement as more evidence, data and technology becomes available.



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