

Outcome Report: Consultation on setting the total allowable catch for Herring in the Firth of Clyde 2022

September 2022

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1. Introduction

On 13 July 2022, Marine Scotland issued a public consultation seeking views on a Total Allowable Catch (TAC) for herring in the Firth of Clyde in 2022. The consultation closed on 03 August 2022.

This report provides a summary and analysis of the written responses to the question posed in the consultation document¹ and describes the outcome of the consultation.

1.1 Background

The Clyde herring stock is defined as the stock in the maritime area situated to the north-east of a line drawn between the Mull of Kintyre (55° 17,9' N, 05° 47,8' W), a point at position (55° 04' N, 05° 23' W), and Corsewall Point (55° 00,5' N, 05° 09,4' W).

Marine Scotland carried out this consultation on behalf of the UK Fisheries Administrations, to seek views on the level of the 2022 TAC, to permit the allocation of Clyde herring quota to UK fishermen.

1.2 Requirements for determining the TAC

As set out in ANNEX FISH.2F of the UK-EU Trade and Cooperation Agreement², the Clyde herring stock is present only in UK waters, and is not a shared stock with the EU. Clyde herring is located exclusively in Scottish waters.

¹ [Herring in the Firth of Clyde - setting the total allowable catch for 2022: consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot/herring-in-the-firth-of-clyde-setting-the-total-allowable-catch-for-2022-consultation/)

² [UK/EU and EAEC: Trade and Cooperation Agreement \[TS No.8/2021\] - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/uk-eu-and-eaec-trade-and-cooperation-agreement-ts-no-8-2021)

Setting the TAC for Clyde herring is therefore the sole responsibility of the UK. It should be noted that, similarly, responsibility for setting the Clyde herring TAC was delegated to the UK by the EU prior to 2021, in line with Article 6 of the EU TAC and Quota Regulation (Council Regulation (EU) 2020/123).

1.3 Consultation

A three week consultation mirrored the approach used in previous year and afforded respondents the same length of time to provide views.

Two options for the TAC in 2022 were proposed within the consultation document:

1. Rollover the 2021 TAC at 583 tonnes.
2. Apply a precautionary buffer, i.e. a 20% reduction on the 2021 TAC. This would equate to a TAC in 2022 of 466 tonnes. This option would mirror the approach taken by ICES for some category 3-6 stocks, when the stock status is unknown.

Respondents were asked: What is your view on the options above for a proposed TAC level for Clyde herring in 2022?

2. Overview of responses

In this section we provide an overview of responses and a summary of key themes raised. In section 3, we set out the Scottish Government's proposed next steps.

2.1 Overview

- During the consultation, a total of 16 responses were received, of which 15 were unique, and one was a duplicate response that had been submitted twice by the same individual. 13 responses were received via Citizen Space and 3 responses were submitted directly to clydeherring@gov.scot.
- Respondents to the consultation were asked whether they were replying as an individual or on behalf of an organisation. 9 responses were received from organisations, and 6 unique responses (7 in total) were received from individuals.

2.2 Analysis of responses and key themes

Of the responses received:

- **4 responses** supported an approach of a rollover of the 2021 TAC at 583 tonnes, of which 3 were submitted by organisations and 1 by an individual.
- **2 responses** supported a 20% reduction on the 2021 TAC, both of which were submitted by individuals.
- **8 responses** suggested that a 0 or de minimis TAC should be applied for 2022, 6 of which were submitted by organisations and 2 by individuals.
- **1 response** (submitted twice by the same individual) suggested that the TAC should be increased to 648 tonnes.

The following key points were made in responses to the consultation, as reasons to reduce the TAC:

- Uncertainty in the current knowledge of the stock was cited by many respondents as a reason to reduce or cease fishing, until more robust scientific data is obtained.
- Many respondents raised concerns with the state of the Clyde herring stock, noting in particular the predominance of fish below minimum landing size, and the lack of evidence of stock recovery despite low landings in recent years. These respondents therefore focused on the importance of allowing time for the stock to recover to a better state.
- Two respondents noted that the low landings in recent years indicated a lack of dependency on the fishery.
- Some respondents suggested increased sampling and/or monitoring of vessels participating in the fishery, to improve knowledge of the stock. One response suggested that a request should be made to ICES for a full stock evaluation.
- Some respondents suggested that there should be a greater focus on developing an ecosystem-based approach to management of herring in the Clyde and the wider west coast.

The following key points were made in responses to the consultation, as reasons to rollover or increase the TAC:

- Some respondents stated that the TAC should be based on the best available scientific information, and that the information currently available gave no scientific justification to reduce the TAC.
- Some respondents raised concerns over a perceived 'use it or lose it' policy.
- Some respondents suggested that a reduction in the TAC this year would set a precedent for year-on-year decreases.
- One respondent suggested that, due to the reduction in the TAC in recent years, the stock should be in a better state, and therefore the TAC should be increased.

3. Outcome and next steps

There is significant uncertainty with regards to the state of the Clyde herring stock. The situation this year is an exception to what we have seen in recent years, with the breakdown of the Scotia in 2022 meaning that the Q1 IBTS survey could not take place, and that there is therefore more uncertainty than usual.

As fishery managers, we must act responsibly even in the absence of fully comprehensive scientific information, and the uncertainties this year suggest that a cautious approach is prudent. Many of the responses to the consultation highlighted this as a reason for setting a reduced or 0 TAC until more robust scientific data can be obtained. On the other hand, other responses highlighted that there is no evidence to suggest that the TAC should be reduced.

Taking into account the best available scientific information and the views submitted through the consultation process, the TAC for 2022 will be set at **466 tonnes**. This is a 20% reduction on the 2021 TAC, following the principle of a precautionary buffer. This mirrors the approach taken by ICES for some category 3-6 stocks, when the

stock status is unknown, and balances the arguments for rolling over or increasing the TAC, with the arguments for setting a 0 or de minimis TAC.

Some respondents raised concerns with what they perceived as a 'use it or lose it' approach to the TAC setting. However, this approach is not impacted or influenced by how much of the stock has been fished in recent years. The approach it is driven by the uncertainty in the information available; regardless of uptake, these levels of uncertainty necessitate a precautionary approach.

This in no way pre-empts the approach that will be taken in future years. As noted above, the situation in 2022 is an exception to what we have seen in recent years, due to a lack of survey data. Appropriate catch limits will be considered each year on the basis of the information available.



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