

Outcome Report: Consultation on setting the total allowable catch for Herring in the Firth of Clyde 2023

July 2023

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1. Introduction

On 13 May 2023, Marine Scotland issued a public consultation seeking views on a Total Allowable Catch (TAC) for herring in the Firth of Clyde in 2023. The consultation closed on 09 June 2023.

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 2023 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.

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.

The consultation document proposed to set the TAC level at 583 tonnes for 2023, the same TAC level between 2015 and 2021.

Respondents were asked: What is your view on the proposed TAC level for Clyde herring in 2023?

2. Overview of responses

¹ [Herring in the Firth of Clyde - total allowable catch 2023: consultation - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/consultations/2023/05/13/consultation-on-setting-the-total-allowable-catch-for-herring-in-the-firth-of-clyde-2023/consultation-document/consultation-document.pdf)

² [UK/EU and EAEC: Trade and Cooperation Agreement \[TS No.8/2021\] - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101421/uk_eu_trade_cooperation_agreement_ts_no_8_2021.pdf)

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 13 responses were received, of which 12 were received via Citizen Space and 1 response was 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. 8 responses were received from organisations, and 5 responses were received from individuals.

2.2 Analysis of responses and key themes

Of the responses received:

- **7 responses** supported an approach of setting a TAC of 583 tonnes, of which 5 were submitted by organisations and 2 by an individual.
- **4 responses** suggested that a 0 TAC should be applied for 2023 of which were submitted by 3 organisation and 1 by individual.
- **2 responses** stated that TAC was too high without stating specific number, both of which were submitted by individuals.

The following key points were made in responses to the consultation, as reasons to set the TAC level from the period between 2015 and 2021 that is 583 tonnes:

- Many of responses agreed with our recommended approach for 2023 to set the TAC at 583 tonnes, which would be returning to the TAC level set between 2015 – 2021.
- 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 offered a support with survey work and therefore could provide some additional scientific information about this herring stock and the wider ecosystem in the Clyde basin.
- Some respondents asked for the fishery be open by 1 August and one of them suggested that fishery should be open all year with a sampling regime to inform future management policy.
- One respondent suggested that given the fishery is not commercially active in past years setting TAC to 2015 – 2021 level would seem to be the most sensible approach.
- One respondent offered the support to assess the effectiveness of the closure in the Ballantrae Bank spawning ground closure on the Clyde herring stock.

The following key points were made in responses to the consultation, as reasons to reduce the TAC or reduce to 0:

- Many respondents raised concerns with the state of the Clyde herring stock 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.
- 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.
- Three respondents raised the point of Clyde herring population being linked to the wider west coast population therefore giving the rationale for setting a much more precautionary TAC or 0 TAC.
- Two respondents noted that the low landings in recent years indicated a lack of dependency on the fishery.
- Two respondents suggested that there should be a greater focus on developing an integrated ecosystem-based approach to management of herring in the Clyde and the wider west coast.
- One respondent suggested the small bycatch quota allowance to support bycatch landings and restricts interest in fishery for this species until recovered. This respondent also noted the lack of discard data.

3. Outcome and next steps

Current knowledge of the stock is uncertain. However, as responsible fisheries managers, our goal is to set sustainable TAC limits which are informed the best available scientific evidence. As the stock is located exclusively within Scottish waters, Marine Scotland takes the lead in setting the TAC, and this includes Marine Scotland Science producing an annual report on acoustic and fisheries data.

During the consultation, many of respondents supported the proposal to return the TAC to the level set between 2015 and 2021 at 583 tonnes and stated that this should not be reduced unless scientific evidence recommends it.

While some of respondents expressed their concern with the state of the stock and the lack of evidence therefore urged for a more precautionary approach until more robust scientific data is obtained.

Taking into account the best available scientific information and the views submitted through the consultation process, the TAC for 2023 will be set at **583 tonnes**, which will be returning to the TAC level set between 2015 – 2021 and to keep in place the existing management measures.



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Any enquiries regarding this publication should be sent to us at

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