Clyde Herring consultation - outcome report

August 2026

Scottish Government
Riaghaltas na h-Alba

1. Introduction

On 17 June 2026, the Marine Directorate (MD) of the Scottish Government issued a public consultation seeking views on a Total Allowable Catch (TAC) for herring in the Firth of Clyde for 2026. The consultation process closed on 8 July 2026. Accordingly, this report provides a summary and analysis of the written responses to the question posed in Section 2 of the consultation document and describes the outcome of the consultation.

1.1 Background

The Clyde herring stock is defined as those herring found 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), all of which lie exclusively within Scottish territorial waters.

The MD carried out this consultation on behalf of the UK Fisheries Administrations, to seek views on the level of the 2026 Clyde herring TAC. Following consideration of the consultation responses, the Scottish Government has made a recommendation to the UK Secretary of State who will make a decision on the TAC level.

1.2 Requirements for determining the TAC

As set out in Annex 36 of the UK-EU Trade and Cooperation Agreement (TCA), the Clyde herring stock is present only in UK (specifically Scottish) waters and is not a shared stock with the EU.

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 was undertaken, mirroring the approach used in previous years, and afforded respondents the same length of time to provide views. The consultation document proposed to set the TAC level at 583 tonnes for 2026, in line with the scientific advice.

Respondents were asked: What is your view on the proposal for Clyde herring in 2026?

2. Overview of responses

During the consultation, a total of 20 responses were received via Citizen Space and email. Respondents to the consultation were asked whether they were replying as an individual or on behalf of an organisation. Fourteen responses were received from organisations, and six responses were received from individuals.

2.1 Analysis of responses and key themes

In total 20 responses were received, which consisted of the following:

- Eleven responses supported the proposal of setting a TAC of 583 tonnes, eight of which were submitted by organisations and three submitted by individuals.
- Eight responses suggested that a minimal (zero) TAC or a ban on fishing should be applied for 2026, of which six were submitted by organisations and two by individuals.
- One response, submitted by an individual, supported fishing of the stock but did not specify a TAC position.

In summary, these key points were made in response to the consultation by responders who were in agreement with the proposal to recommend the TAC at 583 tonnes, in line with the scientific advice provided.

- They considered that the TAC recommendation was precautionary.
- It was their view that there wasn't a strong scientific basis to either increase or decrease the TAC.
- They sought for licences to be issued, ideally by 1 August, to aid the collection of data as part of the fishing activity as per the Clyde herring fishery control measures.

The following summary points were made in response to the consultation, by responders as reasons to reduce the TAC or set it at 0:

- They felt that the focus should be on recovering the stock as there was not a commercial reliance on the fishery.
- They considered that the data show the population in a collapsed state that is dominated by juvenile herrings.
- It was their view that a precautionary approach was not being followed with the proposal, with impacts on the policy and legal obligations of the Scottish Government.
- They suggested that Clyde herring should be managed in a wider ecosystem-based approach, taking account of the Nephrops fishery.
- They felt that regard should be taken of the latest ICES advice for West of Scotland herring.

A range of views were provided on the control measures in place, including suggestions to:

- Remove certain control measures given the presence of REM on pelagic vessels.
- Expand closed areas and timings, including year-round closures.

Responders also included comments on matters wider than the consultation document, including:

- The expansion of REM, including to inshore vessels.
- A request for a review of the Ballantrae Bank closure.
- Considering opportunities for inshore boats to access the fishery.

Respondents who both supported the proposal or suggested alternatives highlighted the importance of gathering evidence to be used in the assessment and supported the measures the MD were taking to do this, including the introduction of a dedicated acoustic survey for sprat and herring in the Firth of Clyde starting in autumn 2027. Responders also highlighted the data collected in 2025 and expressed disappointment that it was not included in this year's analysis. We would like to thank the vessels involved in collecting those data, and to reassure them that a) the data will be incorporated in the process going forward, and b) would not have impacted the scientific recommendation for 2026 as a multi-year time series is needed to allow robust conclusions to be drawn.

Moving this fishery to a monitoring TAC for 2026 was not included for this year, due to the successful collection of commercial catch data, and the intention to introduce a dedicated Firth of Clyde survey. However, we will keep this decision under review subject to the continued collection of data in the coming years.

2.2 Consideration of scientific advice and consultation responses

The Scottish Government, as responsible fisheries managers, have a long-standing objective to set sustainable TAC limits based on the best available scientific evidence while considering our stakeholders' views and wider obligations. As outlined above, a wide range of views have been submitted through the consultation process. While a number of respondents supported the proposal to recommend a TAC of 583 tonnes on the basis of the current available evidence, at the other end of the spectrum some respondents suggested a 0 TAC should be implemented with regards to following a precautionary approach given data limitations.

TAC Recommendation

Consultation responses covered in this section

- They considered that the TAC recommendation was precautionary.
- It was their view that there wasn't a strong scientific basis to either increase or decrease the TAC
- They felt that the focus should be on recovering the stock as there was not a commercial reliance on the fishery.
- It was their view that a precautionary approach was not being followed with the proposal, with impacts on the policy and legal obligations of the Scottish Government.

For data limited stocks, where MSY cannot be quantified, a precautionary approach must still be taken based on the information available. Current knowledge of the Clyde herring stock is insufficient to be able to make an estimation of MSY, but the MD's report informs a management approach which is expected to be sustainable in the long-term for both the stock and the ecosystem, as explained below. To ensure compliance with the precautionary principle, the scientific evidence and advice was developed using a bespoke process which is closely aligned with the ICES Guidelines and Policies.

The specific stock surveys provided in section 6 of the consultation document, suggest an apparent increase in biomass, particularly during Q4, as well as the presence of an adult cohort which gives rise to some optimism that Clyde herring stocks are increasing (or at least stable). Overall, the survey index fluctuates around a long-term mean, and neither consistently increases nor decreases, including in the years after fishing activity took place. Notably, the stock biomass continued to increase following the fishing activity in 2021 and again in 2026 after 323 tonnes (~60% of the TAC) were caught in 2025. Therefore, we can infer that the current stock status is relatively stable and the evidence from previous utilisation suggests that fishing towards the current TAC would not lead to a decline in the stock biomass. We have remained precautionary in our approach by proposing a rollover of the 2025 TAC considering that the evidence available does not suggest an increase or decrease of the TAC (compared to 2025) would be appropriate.

While not a pelagic focused survey, the survey data collected would signal any significant changes of Clyde herring compared to historical data sets. The demersal IBTS surveys still represent a reasonable and appropriate method of tracking herring abundance in this area, especially now that the number of hauls in the Clyde has been increased and are considered to be sufficient to determine stock dynamics. Therefore, the lack of a specific herring survey is not a sufficient reason or evidence to decrease the TAC any further at this time.

While it is a longer-term aspiration to develop a stock assessment model suitable for inclusion into the ICES process, the current available data does not allow for the development of a formula or model which could be used to determine a robust analytical TAC level. Therefore, any changes that are proposed are presented as proportional increases or decreases against this historical TAC depending on signal changes seen in the long-term annual science surveys. We are confident that the baseline historical TAC, which we may propose proportional changes against, is accurate. This was determined when more surveys were conducted, there was a regular herring fishery, and analysis of the herring landed occurred.

Though the quota uptake for this stock has been limited in recent years, we recognise the importance of the opportunity to be available should circumstances allow for fishing effort, such as in 2025, with potential diversification opportunities for some smaller vessels outwith the large pelagic fleet. We remain confident with setting a consistent quota level alongside the control measures, and current evidence as above indicates that the proposed quota remains appropriate, however we will continue to monitor the fishery and stock closely and take action as appropriate.

Scientific evidence

Consultation responses covered in this section

- They considered that the data show the population in a collapsed state that is dominated by juvenile herrings.

While catches have decreased since the 1990s, it is considered that this is because fishing effort has decreased, not because the stock has collapsed. The MD carries

out two annual bottom trawl surveys in West of Scotland waters (IBTS), with stations in the Firth of Clyde. The current time series extends from 1986 to 2026 for Q1, and from 1997 to 2025 for Q4. The bottom trawls are able to provide a long-continued time series and can be included in stock assessments for herring stocks. The IBTS data from these surveys would suggest that the population are largely tracking around the historical mean of the 1990s (see Figure 12 of the consultation document). The IBTS survey data allows us to detect signals in the herring population and MD Science are confident the annual surveys can be used to identify any changes in biomass.

While there is the presence of juvenile herring in Q1, during the fishing season (Q4) Figure 19 of the consultation document clearly shows the presence of an adult cohort in Q4, with levels increasing compared to recent years. In addition, control measures are in place to stop the capture of these juvenile herring, with more detail in ‘Control measures and licencing’.

From the latest survey data points there was no evidence indicating a significant change in the stock biomass, either up or down, including in years after the occurrence of fishing activity. As such, there is no strong case that the current quota would have a harmful effect if utilised in compliance with the control measures.

The start of the new Firth of Clyde acoustic survey in 2027 will add to this evidence base, as will data collected as part of the sampling requirement of the fishery. The scientific recommendation will continue to be led by the best available data, with the expectation that a robust analytical based assessment could be developed in the next 3-5 years.

In addition, there was a recommendation that the Scottish Government submit a request to ICES for a full stock evaluation. Clyde herring has not been subject to an ICES analytical assessment since 1990. This stock is not currently included in the list for which the UK requests advice from ICES and any future inclusion would need to be considered carefully in light of resource restrictions.

There was clarification sought for details on the Clyde herring Working Group. There is not a specific Clyde herring Working Group. The science report included in the consultation document is compiled by MD Science, and based on the latest survey and catch data available. For further details on the Herring Assessment Working Group (HAWG), see the ICES website.

<u>Stock interactions</u>

Consultation responses covered in this section

- They felt that regard should be taken of the latest ICES advice for West of Scotland herring.
- They suggested that Clyde herring should be managed in a wider ecosystem-based approach, taking account of the Nephrops fishery.

While it is noted that Clyde herring are likely linked to other herring stocks in the region, the levels of intermixing are currently unknown. Therefore, Clyde herring and 6aN autumn spawning herring are currently deemed, and managed, as separate stocks, and subject to their own evidence base and TAC setting process. Ensuring the protection of juvenile herring in the Clyde means there are likely to be no adverse impacts on neighbouring stocks. As such, the control measures include a seasonal ban (1 January - 30 April) to protect the juvenile herring while they are within the Clyde.

There were calls for the wider Clyde ecosystem to form part of the management approach, including references to the bycatch of herring within the Nephrops trawl fishery. There is an open consultation on the Fisheries Management Plans (FMP) for West Coast of Scotland and Clyde herring, which launched 22 July and closes on 14 October 2026, bringing together evidence on the state of the stock and identifies policies and actions necessary to manage our fisheries in an effective and sustainable way. We would recommend views are fed back through via the FMP consultation on this approach.

Control measures and licencing

Consultation responses covered in this section

- Remove certain control measures given the presence of REM on pelagic vessels.
- Expand closed areas and timings, including year-round closures
- They sought for licences to be issued, ideally by 1 August, to aid the collection of data as part of the fishing activity as per the Clyde herring fishery control measures.

As set out in the control measures in Section 5 of the consultation report, vessels may only land catches at notified ports or must obtain permission to land at alternative ports. This provides opportunities for compliance officers to attend and monitor landings where appropriate. Compliance activity is supported by a range of additional measures, including inspections at sea and ashore, REM, scrutiny of catch and landing data, and intelligence-led enforcement activity. Additionally, observers were present on the vessels that caught herring in 2025. Collectively, these measures support the monitoring and enforcement of fisheries regulations, including requirements relating to minimum conservation reference sizes (MCRS), and help deter the retention and landing of undersized fish.

It is our view that REM enhances our capabilities, building on the solid foundation Scotland already has in place. At this stage, it is not felt that this should automatically lead to the removal of other measures. We consider that the current control measures to be proportionate to protect the herring population and the wider ecosystem while providing the opportunity to fish the stock.

While we work to conduct the consultation and issue licences in a timely fashion, we acknowledge that doing this earlier would aid fishers in planning the year to provide the best opportunity to catch fish. However, to ensure robust management

recommendation it is important to use the latest data available, namely the Q1 data, which places time constraints on the process. However, should the opportunity arise to bring the recommendation forward without compromising the quality of scientific assessment we shall do so.

2.3 Wider obligations

The Scottish Government has national and international commitments to protect marine biodiversity, and marine ecosystems. The Scottish Government is committed to the sustainable management of fisheries, which includes protecting biodiversity and healthy functioning ecosystems. As fishery managers, we must act responsibly even in the absence of comprehensive scientific information.

SG remains confident that the recommended approach meets these objectives, based on the information provided in the consultation document, the MD science report and section 2.2 of this report.

3. Outcome and next steps

Having considered the best available scientific information, the wider obligations and analysed all responses submitted through the consultation process, the TAC for 2026 has been recommended to the UK Secretary of State at 583 tonnes in parallel to retaining the existing management measures. This is in line with the scientific advice.

The Scottish Government has made a recommendation on this basis to the UK Secretary of State. A determination on the TAC level will subsequently be made by the Secretary of State and licences issued.

As outlined in the consultation, the MD continues to request any relevant additional data that fishers, research organisations, universities or other stakeholders may hold on the Clyde herring stock. A number of respondents also offered to provide evidence and/or assist in collection of data to provide greater understanding on the health of the stock. MD observers also have availability to accompany fishers on vessels to conduct bycatch surveys as an additional means of gathering data. If this is an opportunity stakeholders would be interested in then please contact Campbell Pert (Campbell.Pert@gov.scot) to facilitate this.

Consideration will be given to any data which:

- Is verified numerical data.
- Records some or all of: fish weights, lengths, ages, and maturities. Examples may include herring surveys, herring sampling data, fishers' logbook data (detailing catch, location, reported landings).

Please submit any data to mss.fisheries.advice@gov.scot and Campbell Pert (Campbell.Pert@gov.scot) by 31 December 2026, to allow for consideration during 2027.

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