

From: [Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot> **On Behalf Of** Inshore Mailbox

Sent: 07 April 2025 16:04

To: FO Kinlochbervie <FOKinlochbervie@gov.scot>; FO Kirkwall <FOKirkwall2@gov.scot>; FO Lerwick <FO.Lerwick@gov.scot>; FO Mallaig <FO.Mallaig@gov.scot>; FO Oban <FOOban@gov.scot>; FO Portree <FO.Portree@gov.scot>; FO Stornoway <FO.Stornoway@gov.scot>; FO Ullapool <FO.Ullapool@gov.scot>

Cc: [Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>[Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>; [Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>; [Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>[Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>; [Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>; [Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>; [Redacted under regulation 11(2) of the EIRs] <[Redacted under regulation 11(2) of the EIRs]@gov.scot>

Subject: Wrasse Season 2025

Good afternoon all,

We are ready to start receiving applications for the 2025 wild wrasse fishery. I would be grateful if you can send the revamped application document (attached) to fishers that actively fished under their wrasse derogation last year.

Applications from fishers that meet the [eligibility criteria](#) should be submitted by the local fishery office to inshore@gov.scot **as soon as possible, and before 25 April 2025**. Please note that we have had to reduce the time for applications to be submitted so that we can process the additional data requested in the application. That additional data is key to informing the Appropriate Assessment referred to in the application document.

I hope that the preface of the application form is self-explanatory but to emphasise that, as a Directorate, we need to improve the data we collect from the fishery and how we monitor/manage it. To that end, scientific colleagues are currently amending the scientific wrasse return form and will be in touch with an update on that shortly.

In order to process the letter of derogation, we require all of the following to be submitted

- Application Form (attached) – Fully completed in block capitals and signed/dated. **Please take time to familiarise yourself with the new requirements, in particular the need for photographic evidence and maps to be provided in Sections 6 and 7 of the application form.**
- Contract from supplier – Vessel name, PLN and RSS number must be viewable on contract and signed/dated. **Please note the new requirement that the contract should set out the anticipated supply schedule (as per Section 5 of the application form).**
- Confirm you are content for the vessel to be issued with a derogation and all checks are up to date.

Please direct any queries that you have to inshore@gov.scot and copy in [Redacted under regulation 11(2) of the EIRs]. Please could you also confirm receipt of this email.

Many thanks,

[Redacted under regulation 11(2) of the EIRs]

[\[Redacted under regulation 11\(2\) of the EIRs\]](#)
Policy Officer, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

E: [\[Redacted under regulation 11\(2\) of the EIRs\]@gov.scot](mailto:[Redacted under regulation 11(2) of the EIRs]@gov.scot)

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The Scottish 2025 Wild Wrasse Fishery

Please find enclosed an application form to participate in the wild wrasse fishery for 2025 (Annex A). It is important that you read the following information before completing an application form.

The Marine Directorate of the Scottish Government is committed to the sustainable management of the wild wrasse fishery. We recognise the value of the fishery and the useful diversification opportunity that it provides to some of our inshore fishers. Before applying to participate in the wrasse fishery, we want to give an update on developments which will result in improvements and explain changes for the 2025 fishery.

As you may be aware, we introduced a new management framework for the wild wrasse fishery in 2021. It is important that we learn from experience and continually review the measures and processes that we have in place. We have identified areas where our data gathering can be focussed and improved, including in the revised application form and a reworked scientific data return sheet that all fishers will be required to submit on a weekly basis.

The Marine Directorate is also engaged with, and keeping abreast of wider research on wrasse fishing. In light of evidence, presented to us in 2024, regarding wrasse fishing interactions with Special Areas of Conservation (SACs) and Marine Protected Areas (MPAs), we are currently working with our natural heritage advisors, NatureScot, to complete a required Appropriate Assessment¹. The Assessment will help to ensure that we have the correct controls in place for the wild wrasse fishery, particularly in the most sensitive inshore areas. In the application form, you are asked to confirm the location of your intended 2025 wrasse fishing activity, and detail all anticipated activity in relevant SACs and MPAs.

In particular, for the 2025 wild wrasse fishery, we must improve the geospatial data for the fishery (i.e. the granularity of data we hold about where wrasse fishing is taking place) by using appropriate and proportionate onboard technology. The Scottish Government has already signalled that we will increase the use of tracking devices (i-VMS) on under 12 metre Scottish vessels in 2025/2026, and our intention is that the vessels participating in the 2025 wild wrasse fishery will be early adopters of such technology.² We anticipate that the

¹ [Habitats Regulations Appraisal \(HRA\) | NatureScot](#)

² [Improving inshore fisheries data: Consultation on requiring electronic tracking and monitoring technology on under 12 metre commercial fishing vessels - gov.scot](#)

Scottish Government will cover the initial purchase costs for the i-VMS device and that the fisher will incur all future operating and maintenance costs. Further technical details regarding i-VMS devices will be provided to successful applicants in due course.

In light of the workstreams set out above, we are updating the Terms and Conditions of the wrasse derogation issued to successful applicants. We will confirm any amendments made to those Terms and Conditions as soon as possible, and prior to the fishery opening.

We are also keen to improve communications between wrasse fishers and the Marine Directorate (science, policy and compliance officials), and anticipate holding a couple of group online meetings in 2025. In other small scale fisheries we have found such discussions highly productive, and a valuable means of encouraging a more collaborative approach with clear lines of communication. You will note that Section 8 of the Application Form seeks your preference as to whether you would like to be involved in such discussions.

If, having noted the information set out above, you would still like to be considered for participation in the wild wrasse fishery in 2025, please fill in the application form and submit it (along with the required supporting documents) to your local fishery office **as soon as possible (before 25 April 2025)**.

To avoid any delay in processing your application, it is important that you fill in the form fully and accurately, including the required photographic evidence.

ANNEX A – Application form

APPLICATION FOR A LETTER OF DEROGATION TO FISH FOR WILD WRASSE TO SUPPLY THE SALMON AQUACULTURE SECTOR

This application form may be completed by the owner or charterer of the registered Scottish fishing boat to which the sea fishing licence with the stated licence number below relates (“**the Applicant**”).³

Where the application is successful, a Letter of Derogation will be granted to the applicant, in terms of **condition 5.28** of the sea fishing licence and **condition 5.28.1** of said licence will apply. Please complete in **Block Capitals**.

1. Applicant Details	
Name of applicant	
Address	
Post Code	
Email Address	
Telephone Number	

2. Details of Scottish fishing boat and sea fishing licence	
Name of Scottish fishing boat*	
PLN	
RSS	
Overall length of boat (metres)	
Sea fishing licence number	
Local Marine Scotland Fishery Office	
Number of crew onboard (excluding Master)	
Does your vessel have a primary power source i.e. electrical power sourced from a battery or battery bank, which is then charged by the engine's alternator or an auxiliary charger?	
Will this vessel be engaged in other fisheries between May and December 2025? If so, please provide details (e.g. creel fishing for crabs, handline mackerel)	

*If you own more than one vessel, you must submit a separate application form for each vessel you intend to use to fish wild wrasse.

3. Evidence of Contract to Supply Wrasse

³ Where “Scottish fishing boat” and “sea fishing licence” have the same meanings given to them by regulation 2 of The Sea Fishing (Licences and Notices) (Scotland) Regulations 2011, SSI 2011, No 70.

Please confirm you have a current contract to supply wrasse with a salmon farm operator. ⁴	
Which operator are you contracted to? <i>Please provide the name of the salmon farm operator, as it appears on your contract with them.</i> <i>If you are contracted to more than one farm operator, please provide details in the "Additional Information" section below.</i>	
What is the duration of your contract?	
When did you/will you begin to supply wrasse to the salmon farm operator in terms of the contract?*	

*Please note the dates you provide must match the dates held within your contract.

4. Additional Information		
Farm Operator Details	Contract Duration	Date of Commencement

5. Your anticipated 2025 Supply Schedule to the Salmon Farm/s identified in Sections 3 & 4 of this form								
	May	June	July	Aug	Sept	Oct	Nov	TOTAL
Number of Ballan Wrasse								
Number of Corkwing Wrasse								
Number of Goldsinny Wrasse								
Number of Rock cook Wrasse								
Number of Cuckoo Wrasse								

*Please note these details must align with details held within your contract with the salmon farm.

⁴ A salmon farm operator is a person who carries on a business of fish farming and who is authorised as an aquaculture production business under The Aquatic: Animal Health (Scotland) Regulations 2009.

6. Fishing operations (gear and bait) under the wrasse derogation in 2025	
How many pots/creels will you be using to fish for wrasse?	
What type or types of pots/creels will you use to fish for wrasse? If using more than one type of creel/pot, please confirm how many of each type you will be using.	
How many entrances do your wrasse pots/creels have?	
Please provide a photograph/s of the type of pots/creels you intend to use.	
How many days do you plan to fish for wrasse on a weekly basis?	
How frequently do you plan to set and lift your wrasse pots/creels?	
Pots/creels used to fish for wrasse should have otter exclusion devices, such as a fixed eye aperture at the entrance to the trap. Please provide <u>details and photographic evidence</u> to demonstrate how your pots/creels exclude otters. You should provide as much information as possible, including dimensions and associated units of measurement (e.g. centimetres, inches).	
What type of bait do you intend to use to fish for wrasse and where will the bait be sourced from?	

7a) Fishing operations (locations) under the wrasse derogation in 2025	
Where are you planning to fish for wrasse? Please provide a map/s of the location/s you intend to fish.	
At what average depth are you planning to fish for wrasse?	
Does the fishing vessel identified in section 2 of this application form already have a tracking device (i-VMS) onboard? If so, please provide details about the device and project it is used in.	

7b) Will any of your wrasse fishing activity in 2025 overlap with the following Special Areas of Conservation (SAC) or Marine Protected Areas (MPAs)? You must complete each line of the table.

Click the link of each named relevant site to view map of the area being referred to.

Relevant Site (MPA or SAC)	Will your wrasse fishing activity overlap the relevant site? (Yes/No)	Number of wrasse pots/creels to be used in the relevant site	Minimum & maximum depth that wrasse creels/pots will fish at in the site (metres)
Firth of Lorn SAC			Min: Max:
Dornoch Firth and Morrich More SAC			Min: Max:
East Mingulay SAC			Min: Max:
Isle of May SAC			Min: Max:
Loch Laxford SAC			Min: Max:
Lochs Duich, Long and Alsh Reefs SAC			Min: Max:
Mousa SAC			Min: Max:
North Rona SAC			Min: Max:
Papa Stour SAC			Min: Max:
Sanday SAC			Min: Max:
Solway Firth SAC			Min: Max:
Sound of Barra SAC			Min: Max:
Sullom Voe SAC			Min: Max:
Treshnish Isles SAC			Min: Max:
St Kilda SAC			Min: Max:
Sunart SAC			Min: Max:
Fetlar to Haroldswick MPA			Min: Max:
South Arran MPA			Min: Max:
Wyre and Rousay Sounds MPA			Min: Max:
Wester Ross MPA			Min: Max:
Small Isles MPA			Min: Max:

Loch Carron MPA			Min: Max:
Upper Loch Fyne and Loch Goil MPA			Min: Max:
Noss Head MPA			Min: Max:
Loch Sween MPA			Min: Max:
Shiant East Bank MPA			Min: Max:
Hascosay SAC			Min: Max:
Loch nam Madadh SAC			Min: Max:
Yell Sound Coast SAC			Min: Max:
Sea of the Hebrides MPA			Min: Max:
Southern Trench MPA			Min: Max:

7c) The Special Areas of Conservation (SAC) listed below are predominantly terrestrial sites but the coastal areas and waters in/near the site are important for otters. Will any of your wrasse fishing activity in 2025 be within or in adjacent shallow waters (less than 10 metres depth) of the site?

You must complete each line of the table. Click the link of each named relevant site to view map of the area being referred to.

Relevant Site (SAC)	Will your wrasse fishing activity overlap with the site or its adjacent shallow (less than 10 metres depth) waters? (Yes/No)
Ardvar and Loch a' Mhuilinn Woodlands SAC	
Durness SAC	
Glen Beasdale SAC	
Kinloch and Kyleakin Hills SAC	
Loch Moidart and Loch Shiel Woods SAC	
Mull Oakwoods SAC	
Rum SAC	
South Uist Machair SAC	
Taynish and Knapdale Woods SAC	
Tayvallich Juniper and Coast SAC	

8. Management of the wild wrasse fishery: Improving Communication and Engagement

Would you like to participate in online discussions with scientists, policy developers, and enforcement officers from the Marine Directorate about the wild wrasse fishery?

Please indicate any preferences for such engagement, for example preferred online platform or preferred days of the week.

As a condition of your eligibility to be granted a Letter of Derogation under this scheme and/or, if your application is successful, as a condition of your sea fishing licence, Marine Directorate of the Scottish Government require you to supply a copy of your contract with the salmon farm operator in order to evidence the same.

Please note the contract provided by the salmon farm operator must include your details, your vessels details and the dates of commencement/cessation. Furthermore, for the 2025 fishery, the contract that you have must confirm the Supply Schedule information set out in Section 5 of this application.

Declaration

It is an offence to knowingly or recklessly provide false information in the context of a fishing licence. A false statement may result in the application being refused or the Letter of Derogation being withdrawn in the event that it has already been granted.

I confirm that I wish to be considered for permission to fish wild wrasse and that the information contained within this application form is true, correct and complete. I understand that any misrepresentation may invalidate this application.

I understand that the owner and/or charterer of the vessel to which this application relates are each responsible for complying with the licence conditions annexed to any of Letter of Derogation granted as a result of this application and that failure to continuously comply with such licence conditions may result in the Letter of Derogation being withdrawn and/or Marine Directorate taking other enforcement action.

I understand that I must continue to fulfil the Eligibility Criteria for the wrasse scheme on an ongoing basis and that failure to consistently comply with the Eligibility Criteria may result in the Letter of Derogation being withdrawn.

I confirm I will notify Marine Directorate if any of the details, provided in this application form, change.

UK GDPR: The Scottish Government undertakes to comply with the data protection principles in all matters relating to the processing and storing of personal information.

Please acknowledge your understanding and acceptance of the conditions outlined in this application form by signing and dating this section.

Printed Name:

Signature: _____ Date: _____
Owner / Charterer (Please delete as appropriate)

Please submit your completed application to your local fishery office (with all the required supporting information) as soon as possible and before 25 April 2025.