

# **Business and Regulatory Impact Assessment on Demersal Fisheries Management Plans**

November 2025

# Introduction

The [Joint Fisheries Statement \(JFS\)](#), as required by the Fisheries Act 2020 (the 2020 Act), sets out how the UK fisheries authorities (Defra, Scottish Government, Welsh Government and the Department of Agriculture, Environment and Rural Affairs in Northern Ireland) will prepare and publish 43 Fisheries Management Plans (FMPs) by 2026 for the Scottish-led FMPs, with some of the remaining plans led by the other UK fisheries authorities published by 2028<sup>1</sup>.

The plans bring together the evidence on the state of the stocks and identify measures and actions necessary to improve the evidence base and manage our fisheries in a sustainable way. Policies in an FMP set out both the short-term actions and longer-term vision for the management of the fishery.

This assessment is being undertaken alongside a public consultation on 11 proposed Demersal FMPs, and further information is sought there regarding additional economic evidence to update this assessment before the publication of final Demersal FMPs.

This partial BRIA describes the anticipated economic impact of the 11 Demersal FMPs on the fishing sector and associated businesses.

This assessment document covers the following Demersal FMPs:

- North Sea and West Coast of Scotland Haddock FMP hereafter referred to as 'Northern Shelf' Haddock FMP
- Atlantic haddock FMP
- Northern Shelf Cod FMP
- Atlantic Cod FMP
- North Sea and Eastern Channel Whiting FMP
- West Coast of Scotland Whiting FMP
- North Sea Whiting FMP
- North Sea and West Coast of Scotland Saithe hereafter referred to as 'Northern Shelf' Saithe FMP
- Northern Shelf Hake FMP
- North Sea and West Coast of Scotland Monk/Anglerfish FMP hereafter referred to as 'Northern Shelf' Anglerfish FMP
- North Sea and West Coast of Scotland Megrin FMP hereafter referred to as 'Northern Shelf' Megrin FMP
- Northern Shelf Ling FMP

Fishing opportunities for these stocks are currently set through international negotiations with other coastal states. The International Council for the Exploration of the Sea (ICES) provides advice under a Maximum Sustainable Yield (MSY) approach, and then fisheries managers set the Total Allowable Catches (TACs) guided by this advice. While most Demersal FMPs are Category 1 stocks under the ICES assessment framework (stocks with quantitative assessments), some stocks qualify as Category 2 (stocks with analytical assessments and forecasts that are only

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<sup>1</sup> Annex A of the JFS was amended in December 2024.

treated qualitatively, such as Northern Shelf megrim in area 6.b), Category 3 (stocks for which survey-based assessments indicate trends, such as Northern Shelf ling) and Category 6 (negligible landings stocks and stocks caught as minor amounts as bycatch, such as Atlantic cod). This means that the evidence base supporting the management of the relevant fisheries can vary on a stock by stock basis. The relative health of the stocks in question can also vary depending on a range of factors. The FMPs provide substantial detail in relation to this.

Fishing for demersal stocks in UK waters takes place as part of a mixed fishery, meaning that demersal fish stocks are often caught alongside each other. Although these stocks are subject to separate FMPs, there are many shared characteristics between these demersal stocks and similarities in where and how they are fished. When considering management actions as part of these FMPs, and in wider management considerations such as the setting of fishing opportunities, fisheries policy authorities consider the role of demersal species in the wider marine ecosystem. Many of the issues that are considered as part of these FMPs are applicable across demersal fisheries, and therefore the actions required may not be specific to one stock or fishery. They are commercially important species within UK waters, with the total value of the species covered by the FMPs above landed by the UK fleet totalling £182.9 million in 2024. A breakdown by specific FMP is included below in Table 1.

**Table 1. Areas covered, tonnage, and value (£000's) landed for individual FMPs (UK vessels, caught in UK waters, landed anywhere, 2024)**

<b>FMP</b>	<b>Areas Covered</b>	<b>Tonnes</b>	<b>Value (£000s)</b>
Northern Shelf Cod	27.4.a, 27.4.b, 27.4.c, 27.6.a, 27.7.d	13,853	48,307
Northern Shelf Haddock	27.4.a, 27.4.b, 27.4.c, 27.6.a	36,307	40,813
Northern Shelf Anglerfish	27.4.a, 27.4.b, 27.4.c, 27.6.a, 27.6.b	8,720	32,676
Northern Shelf Hake	27.4.a, 27.4.b, 27.4.c, 27.6.a, 27.6.b, 27.7.a, 27.7.d, 27.7.e, 27.7.f, 27.7.h, 27.7.g, 27.7.j	4,744	18,584
North Sea and Eastern Channel Whiting	27.4.a, 27.4.b, 27.4.c, 27.7.d	9,781	11,298
Northern Shelf Saithe	27.4.a, 27.4.b, 27.4.c, 27.6.a, 27.6.b	9,624	10,886

Northern Shelf Ling	27.2.a, 27.4.a, 27.5.b, 27.6.a, 27.6.b	5,076	9,907
Northern Shelf Megrin	27.4.a, 27.6.a, 27.6.b	1,520	6,306
Atlantic Haddock	27.6.b	2,315	3,804
West Coast of Scotland Whiting	27.6.a, 27.6.b	212	247
Atlantic Cod	27.6.b	41	150

Source: SG internal fisheries management data, August 2025. Figures may differ from the published [Provisional Scottish Sea Fisheries Statistics 2024](#).

Foreign vessels also catch these species within UK waters, with the tonnage and value given below in Table 2. In total, foreign vessels landed £10.1 million worth of the covered species into the UK. Note that our management data only shows those catches from UK waters landed into the UK.

**Table 2. Tonnage and value (£000's) landed for individual FMPs (foreign vessels, caught in UK waters, landed into the UK, 2024)**

<b>FMP</b>	<b>Tonnes</b>	<b>Value (£000s)</b>
Northern Shelf Hake	927	3,263
Northern Shelf Ling	1,205	2,425
Northern Shelf Saithe	1,179	1,827
Northern Shelf Anglerfish	447	1,231
Northern Shelf Cod	208	758
Northern Shelf Haddock	254	426
Northern Shelf Megrin	42	104
North Sea and Eastern Channel Whiting	52	86
West Coast of Scotland Whiting	10	23
Atlantic Haddock	3	0
Atlantic Cod	0	0

Source: SG internal fisheries management data, August 2025. Figures may differ from the published [Provisional Scottish Sea Fisheries Statistics 2024](#).

The 11 Scottish-led Demersal FMPs set out policies and actions relating to the stocks which are to be implemented in a way that is consistent with, and supportive of, the wider achievement of the fisheries objectives set out in the 2020 Act, the policies contained within the JFS and other legislative commitments.

These plans also identify evidence gaps and consider research for the species they cover to enhance current management and ensure that sustainability is maintained.

The FMPs describe an overview of the current fisheries for demersal species in UK waters as well as providing information on available stock assessments, maximum sustainable yield (MSY) and stock biology.

# Executive summary

This partial BRIA describes the anticipated economic impact of the 11 Demersal FMPs on the fishing sector and associated businesses. The demersal FMPs do not result in direct measurable impacts at this stage because the FMPs do not result in new regulation upon publication. Therefore, this document is a narrative assessment and does not include monetised or quantified costs to businesses. As specific actions are implemented, further impact assessments (by all relevant authorities) will be completed that include a more complete assessment of the monetised costs to business associated with that action.

The following options have been considered as part of the partial BRIA:

## **Option 1 (preferred option): Publication of Demersal FMPs**

It is considered that pursuing Option 1 and publishing the Demersal FMPs would enable the Scottish Government (and the other relevant authorities in the UK) to support delivery of sustainable fisheries for current and future generations. Option 1 would also comply with the statutory obligation in the 2020 Act to prepare and publish the FMPs (the FMPs having been included in the JFS November 2022 and amended in December 2024).

As noted above, the FMPs themselves will not introduce any new regulatory measures upon publication, accordingly it is not considered their publication would introduce additional costs. The costs associated with adhering to measures which may be developed through actions identified within the FMPs depend on the specifics of the measures which are subsequently proposed. As these are currently unknown, they cannot be easily identified, or quantified. but costs could materialise through a change in landings profile, a change of fishing area, or the cost of complying with new gear and equipment regulations, as well as the subsequent overhead costs such activities might incur.

The benefits associated with measures which are developed from the actions which are identified in the FMPs following their publication depend on the specific measures proposed. As these are currently unknown, the benefits cannot be easily identified, or quantified at this time but are likely to materialise in the form of sustainable fishing opportunities that will provide fishers with sustainable economic opportunities into the future. There may also be environmental benefits realised through improving the underpinning evidence base, facilitating management decision making that considers a wider and improved range of fisheries and environmental data.

Option 1 - Publication of Demersal FMPs – is recommended.

## **Option 2: Business as Usual (Do Nothing) – No Demersal FMPs published.**

The Scottish Government (and the other relevant authorities in the UK) have obligations arising from the 2020 Act and JFS to publish the FMPs. Before proceeding with a business as usual (BAU) option of not publishing FMPs, it would

be necessary for steps to be taken to vary the current obligations (through amendments to the JFS).

As a continuation of BAU, through Option 2 is unlikely to result in any additional costs to businesses beyond those already incurred by the demersal fishing sector, and associated business. There may be some benefit in the continuation of BAU, given that it is consistent with regulatory framework of previous years, however, the impact of this benefit is unlikely to be significantly felt by businesses. Option 2 of not publishing the FMPs would lose the benefit of enabling the Scottish Government (and the other relevant authorities in the UK) to support delivery of sustainable fisheries for current and future generations.

Option 2 – Business as Usual (do Nothing) – is not recommended.

### **Sectors affected by the policy**

The following sectors have been identified as groups who will be affected by the proposal: UK demersal fishing industry, wider UK and International demersal fishing industry operating in UK waters and UK retailers. Businesses will be invited to respond to the public consultation.

### **Engagement**

Demersal FMPs have been informed by a range of stakeholder engagement initiatives, including a working group of over 50 industry, environmental and SNCBs stakeholders and separate bilateral meetings that took place over a number of months to gather additional views and input. This was part of a process known as 'pre-consultation'. Feedback received as part of formal public consultation will help shape the final document.

### **Post implementation review**

The policies and actions within each FMP will be reviewed as part of the three year review cycle for the JFS. In addition, as set out within the 2020 Act and the JFS, the FMPs will be reviewed at least every six years. The review of the FMPs will include a report on individual policies and actions and whether they have been a) implemented and b) any known interactions between the actions and health of the stock.

# Section 1: Background, aims and options

## Background to policy issue

The Fisheries Act 2020<sup>2</sup> ('the 2020 Act') provides the framework to manage UK fisheries as an independent coastal state outside of the EU Common Fisheries Policy. The 2020 Act requires the UK fisheries policy authorities (Defra and the devolved administrations in Scotland, Northern Ireland, and Wales) to prepare and publish fisheries management plans (FMPs) to help deliver the UK ambition for sustainable fisheries.

Fish are a common good, and are rivalrous and non-excludable. Given this characteristic, overexploitation and overconsumption are risks unless governments intervene. In addition to this characteristic, there are also negative externalities associated with fishing itself and positive externalities associated with having a healthy and diverse marine environment. FMPs are one of many tools available to the Scottish Government (and other Governments), and managing the sustainability of fish stocks can additionally involve setting fishing quotas, introducing technical measures, or encouraging research and development.

The Joint Fisheries Statement<sup>3</sup> (JFS), published in November 2022, and updated in December 2024, lists 43 proposed FMPs to be published, including 11 demersal Fisheries Management Plans (FMPs) in UK waters. The fisheries policy authorities have a statutory obligation to prepare and publish any FMP on that list in accordance with the timescales set out in the JFS.

FMPs set out the policies designed to restore one or more stocks of sea fish to, or maintain them at, sustainable levels or to contribute to that restoration or maintenance. Where there is not sufficient scientific evidence for MSY, plans will also consider steps to obtain scientific evidence for this. Each plan specifies the stock(s), type of fishing and the geographic area covered. Each FMP also identifies the actions that could be used to deliver its policies. Such measures may include both existing or new regulations, statutory instruments, technical measures, or non-statutory routes such as research plans, voluntary agreements, or codes of conduct. The precise mechanisms used will depend on the policies set out in the plan and, where appropriate, will be enforced by the relevant national fisheries authority. The proposed measures could be regulatory or deregulatory, and positive or negative to business. Where actions involved proposed introduction of new measures, separate assessment, consideration, consultation and engagement on those measures would take place in the usual way before any introduction.

This BRIA has been produced to support the consultation on the Demersal FMPs. The purpose of the consultation is to seek views from those with an interest in the plans. The consultation also seeks feedback on the evidence presented in the plans and provides an opportunity for respondents to provide additional evidence that may support the FMP policies.

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<sup>2</sup> [Fisheries Act 2020](#)

<sup>3</sup> [Joint Fisheries Statement](#)

## Purpose/ aim of action and desired effect

The desired aim of these 11 Demersal FMPs is that the fisheries they cover are managed sustainably, to help ensure that stocks are maintained above biomass levels capable of producing MSY and to highlight areas that could lead to refinements to management approaches in the future. For some stocks which are not currently being fished at sustainable levels, actions are set out to improve the management approach.

In developing the policies and actions for the 11 Scottish-led Demersal FMPs, the fisheries policy authorities have considered the current policy landscape. This includes applicable international agreements and declarations, conservation advice and wider policy development already underway, in addition to considering what additional evidence, measures or policies may be needed to support both the vision of these FMPs and delivery of the fisheries objectives.

To ensure effective ongoing management of the demersal fisheries in the UK waters, the FMPs identify five or six policies (see below) focussed on domestic and international management priorities. These policies and the individual actions that sit under each policy, are subject to the consideration of the consultation and will be prioritised appropriately to ensure realistic and measurable outputs. They were drafted to meet the requirements of section 6(3) of the 2020 Act (policies 1 and 2) and policies set out in the JFS (policies 3, 4, 5 and 6).

The six policies for the demersal FMPs are similar for most of the plans included in this Consultation, excluding the Northern Shelf Ling FMP, the Atlantic Cod FMP and the Northern Shelf Cod FMP.

The six policies for the Demersal FMPs, excluding the Northern Shelf Ling FMP, the Atlantic Cod FMP and the Northern Shelf Cod FMP, are to:

1. Harvest the stocks sustainably, with biomass maintained above the level capable of producing MSY;
2. Use the best-available scientific evidence to support management decisions relating to the setting of sustainable fishing opportunities;
3. Address discarding issues in the respective fishery and ensure that where possible all catches are counted against quotas;
4. Deliver wider sustainable management by taking steps to minimise the impact of the demersal fisheries on the marine ecosystem;
5. Support fishing businesses to continue to deliver socio-economic and cultural benefits for communities;
6. Reduce the impact of fishing on climate change and support the fishing industry to adapt to the impacts of climate change.

The policies and actions for the **Northern Shelf Ling FMP** differ slightly from the other demersal FMPs.

Whilst the relevant fisheries policy authorities do not have sufficient evidence to estimate MSY reference points for the Northern Shelf ling fishery covered by this FMP, the advice and management approach follows the ICES MSY approach under

their framework for Category 3 stocks. To ensure effective ongoing management of the Northern Shelf ling fishery in UK waters, the FMP identifies six policies focussed on domestic and international management priorities. These policies are subject to the consideration of the consultation and will be prioritised appropriately to ensure realistic and measurable outputs. Similar to the other demersal FMPs, they were drafted to meet the requirements of section 6(3) of the 2020 Act (policy 1 and 2) and policies set out in the JFS (policies 3, 4, 5, and 6).

The six policies of the Northern Shelf Ling FMP are to:

1. Continue to manage the Northern Shelf ling stock using existing tools to maintain stock levels;
2. Improve the evidence base underpinning the stock, in order to support sustainable harvesting of the Northern Shelf ling stock, with biomass maintained above the level capable of producing MSY;
3. Address discarding issues in the Northern Shelf ling fishery and ensure that where possible all catches are counted against quota;
4. Deliver wider sustainable management by taking steps to minimise the impact of the ling fishery on the marine ecosystem;
5. Support fishing businesses to deliver socio-economic and cultural benefits for communities;
6. Reduce the impact of fishing on climate change and support the fishing industry to adapt to the impacts of climate change.

The policies and actions for the **Atlantic Cod FMP** also differ slightly from the other demersal FMPs. This is because there is a significant shortfall in the data available for Rockall cod and it is classified by ICES as data limited (Category 6). This means that ensuring the right fisheries management measures are in place is difficult, as the overall health of the stock cannot currently be determined. The stock itself is caught as part of a mixed fishery with fishing vessels that target Rockall haddock and anglerfish (stocks that are healthy and abundant in the area). Therefore, there are significant socio-economic considerations to be taken into account when setting fishing opportunities for Rockall, and consequently fishing opportunities for Rockall cod are currently often set above the ICES MSY advice. The actions within this FMP are therefore focussed on improving the evidence base for Rockall cod, so that an accurate assessment of stock health can be undertaken, and fishing opportunities set at appropriate levels in the future. Areas for action also include those which support the wider delivery of policies within the JFS and which contribute to the delivery of the objectives contained within the 2020 Act.

Sustainable management of the Rockall cod stock is dependent on the evidence base being strengthened, with actions focussed on restoring (if required) and then maintaining the stock at sustainable levels.

The Atlantic Cod FMP, therefore, identifies five policies focussed on domestic and international management priorities. These policies are subject to the consideration of the consultation and will be prioritised appropriately to ensure realistic and measurable outputs. Similar to the other demersal FMPs, they were drafted to meet the requirements of section 6(3) of the 2020 Act (policies 1 and 2) and policies set out in the Joint Fisheries Statement (policies 3, 4 and 5).

The five policies of the Atlantic Cod FMP are to:

1. Continue to manage the Rockall cod stock using existing tools to maintain stock levels;
2. Take action in partnership with the EU to improve the evidence base underpinning the stock, in order to support sustainable harvesting, with biomass maintained above the level capable of producing MSY;
3. Address discarding issues in the Rockall cod fishery and ensure that where possible all catches are counted against quotas;
4. Deliver wider sustainable management by taking steps to minimise the impact of vessels fishing in the Rockall area which take a bycatch of cod on the marine ecosystem;
5. Reduce the impact of fishing on climate change and support the fishing industry to adapt to the impacts of climate change.

The policies and actions for the **Northern Shelf Cod FMP** also differ slightly from the other demersal FMPs. For many years ICES advice considered the North Sea cod and the West of Scotland cod as two separate stocks, and there were a number of fluctuations in the advice and TAC over the years 2019 to 2024. The TAC advice issued by ICES in September 2023 represented a significant change in the perception of the stock health, and the merging of the advice for North Sea and West of Scotland into one overarching 'Northern Shelf' stock advice. Fluctuations in the health of the stock over the years represent the complex structure of the cod stock, its susceptibility to significant changes, and the underlining evidence challenges for the stock. In turn, it makes cod one of most challenging stocks to manage. There are a number of measures in place to manage the Northern Shelf cod stock, including a range of stock specific measures established in 2020 under the National Cod Avoidance Plan (NCAP). These are detailed in Annex A of the Northern Shelf Cod FMP. It should be noted that the TAC advice for 2026 was recently published by ICES (on 23 September 2025) and when reviewing measures, the fisheries authorities will consider the status of the substocks for 2026, and application of ICES guidelines on mixed fisheries.

The FMP sets out six policies and a number of corresponding actions for each policy to manage the Northern Shelf cod stock at sustainable levels, ensuring that it can continue to play a key role in providing positive socio-economic benefits to the UK. Although the six policies are similar to the other demersal FMPs, the individual actions set out the need to improve the scientific evidence base underpinning the stock, along with actions to improve management, in particular actions to be undertaken in collaboration with other Coastal States.

The six policies of the Northern Shelf Cod FMP are to:

1. Harvest the Northern Shelf cod stock sustainably, contributing to restoring and maintaining the biomass above the level capable of producing MSY, taking decisions that reflect the status and uncertainty of vulnerable substocks;
2. Use the best-available scientific evidence to support management decisions relating to the setting of sustainable fishing opportunities;
3. Address discarding issues in the Northern Shelf cod fishery and ensure that where possible all catches are counted against quotas;

4. Deliver wider sustainable management by taking steps to minimise the impact of the cod fishery on the marine ecosystem;
5. Support fishing businesses to deliver socio-economic and cultural benefits for communities;
6. Reduce the impact of fishing on climate change and support the fishing industry to adapt to the impacts of climate change.

Once formally published, the policies and actions within the plans will need to be implemented. This will be an iterative process and the Scottish Government will be working closely with the other fisheries administrations, the fishing sector and wider stakeholders on implementation. Publishing the FMPs is the start of a multi-year cycle, and we will ensure that the plans strike the balance between building momentum for short-term actions and setting direction for the longer term. This can be further iterated as the evidence base is improved. The plans must be reviewed at least every six years. Cross regulator, government and industry groups have been central to the development of the draft FMPs. Stakeholder involvement and ongoing collaboration underpins successful delivery of the FMPs and will continue beyond their publication.

## **Options (considered so far/ still open)**

### **Option 1 (preferred option): Publication of Demersal FMPs**

The Demersal FMPs are published, setting out the policies designed to maintain stocks at sustainable levels by bringing together information on existing measures and available evidence, mapping where there are gaps and opportunities to fill them, setting a clear pathway to developing and introducing improved, evidence-based management in collaboration with industry/ stakeholders.

### **Option 2: Business as Usual (Do Nothing) – No Demersal FMPs published**

By pursuing Option 2 and not publishing demersal FMPs the Scottish Government (and the other relevant authorities in the UK) would fail to meet legal obligations under the 2020 Act and JFS requiring publication of the FMPs. If there was an intention to pursue Option 2, of not publishing the FMPs, amendments to the JFS would be required.

## **Sectors/ Groups affected**

The following sectors have been identified as groups who will be affected by the proposal:

- UK demersal fishing industry
- Wider UK and International demersal fishing industry operating in UK waters
- UK retailers

Businesses will be invited to respond to the public consultation. This section of the BRIA will be updated following input from relevant organisations.

## **Section 2: Engagement and information gathering**

### **Engagement approach**

Demersal FMPs have been informed by a range of stakeholder engagement initiatives. A working group of over 50 industry, environmental and SNCBs stakeholders was formed in 2023, and met multiple times to help inform and shape the content of the FMPs. In addition, separate bilateral meetings took place over a number of months to gather additional views and input. This was part of a process known as 'pre-consultation'. As part of the process, the Scottish Government shared drafts of some of the demersal FMPs and gathered comments from stakeholders at two workshops held in February 2025 and by inviting written feedback. Stakeholder knowledge has been valuable in providing context for the FMPs, and in developing meaningful actions that will support the sustainable management of demersal fisheries in the future.

Feedback received as part of formal public consultation will help shape the final document.

## **Internal SG engagement/ engagement with wider Public Sector**

### **Internal SG engagement**

Consultation has been undertaken with officials within the Marine Directorate of the Scottish Government, including policy, compliance and science experts and marine analysts/economists.

### **UK/ Devolved Administrations**

Within the UK we have also engaged with DEFRA, the Marine Management Organisation (MMO), the Welsh Government and Northern Ireland Executive on all FMPs relevant to them.

### **International**

In an international context we have engaged with the EU to allow to them to provide feedback on demersal FMPs.

## **Business / Third Sector engagement**

A working group of over 50 industry, environmental and SNCBs stakeholders was formed in 2023, and met multiple times to help inform and shape the content of the FMPs. In addition, separate bilateral meetings took place over a number of months to gather additional views and input.

## **Public consultation**

This partial BRIA has been produced to support public consultation on the Demersal FMPs. The purpose of the consultation is to seek views from those with an interest in the plans. The consultation also seeks feedback on the evidence presented in the plans and provides an opportunity for respondents to provide additional evidence that may support the FMP policies.

## **Section 3: Costs, impacts and benefits**

### **Quantified costs to businesses**

Whilst the demersal FMPs include a variety of policies and actions, these will not be implemented immediately following publication of the FMP. Instead, specific measures must be developed through the appropriate processes before being implemented; such development may require further consultation, evidence and/or input from stakeholders and policymakers. The demersal FMPs do not result in direct measurable impacts at this stage because the FMPs do not introduce new measures upon publication. Therefore, this document is a narrative assessment and does not include monetised or quantified costs to businesses. As specific actions are implemented, further impact assessments (by all relevant authorities) will be completed that includes a more complete assessment of the monetised costs to business associated with that action.

#### **Option 1: Publication of Demersal FMPs**

The costs associated with adhering to FMP measures depend on the specific measures proposed. As these are currently unknown, they cannot be easily identified, or quantified. In general, the FMPs aim is to facilitate managing stocks sustainably through improved, evidence-based management via collaboration between Scottish Government, industry, and stakeholders. Any measure that requires a change to fishing activity will likely incur costs associated with adapting to these changes. These costs could materialise through change in landings profile, a change of fishing area, or the cost of complying with new gear and equipment regulations, as well as the subsequent overhead costs such activities might incur. There may also be time costs associated with adapting to the changes, whether this be increased time spent ensuring compliance with regulations or time spent adhering to reporting requirements. Due to the current uncertainty of specific measures to be introduced, these costs are listed as example costs only. They are not exhaustive of the potential costs that may be incurred, nor are they indicative of the specific measures that may be introduced.

There may also be some environmental costs incurred through pursuing Option 1. This could be in the form of changing environmental pressures as a result of business adapting to new measures implemented via the FMPs. Again, as the specific measures to be implemented are unknown, the exact impact on the environment cannot be identified.

#### **Option 2: Business as Usual – No FMP published**

As a continuation of business as usual (BAU), implementing Option 2 is unlikely to result in any additional costs to businesses beyond those already incurred by the demersal fishing sector, and associated business. Fishing opportunities would likely remain the same as previous years, subject to variances in TAC and quota negotiations which are beyond the remit of the FMPs. Option 2 may potentially increase the likelihood of stocks being overexploited given that no additional efforts to strengthen the evidence-base, or manage stocks sustainably, would be pursued. This could in turn have a longer term negative impact on the future fishing

opportunities for the species affected. Additionally, no additional measures to improve environmental protection would be pursued, which could result in negative environmental impacts. It is also likely to impact on consumer confidence in the long-run, potentially making UK fisheries less attractive to UK retailers and consumers who may question the overall sustainability of UK seafood. However, FMPs are not the only measure of sustainability and therefore the likelihood of this occurring is likely to be low.

It should be noted that by pursuing Option 2 and not publishing demersal FMPs the Scottish Government (and the other relevant authorities in the UK) would fail to meet its legal obligation under the 2020 Act and JFS requiring publication of the FMPs. If there was an intention to pursue Option 2, of not publishing the FMPs, amendments to the JFS would be required.

## **Benefits to business**

### **Option 1: Publication of Demersal FMPs**

As noted above, the benefits associated with measures arising from actions in published FMPs depend on the specific measures which are subsequently proposed. As these are currently unknown, the benefits cannot be easily identified, or quantified at this time.

In general, the FMPs aim to manage stocks sustainably by bringing together information on existing measures and available evidence, mapping where there are gaps and opportunities to fill them. This sets out a clear pathway to developing and introducing improved, evidence-based management in collaboration with industry and stakeholders. As such, the benefits to business associated with measures developed from FMP actions are likely to materialise in the form of sustainable fishing opportunities that will provide fishers with sustainable economic opportunities into the future. There may also be environmental benefits associated with this Option, realised through improving the underpinning evidence base, facilitating management decision making that considers a wider and improved range of fisheries and environmental data. Whilst perhaps less immediately tangible to businesses in the short term, these benefits are likely to have a longer-term economic and environmental impact to businesses through sustainably safeguarding future fishing opportunities.

### **Option 2: Business as Usual – No FMPs published**

Fishing activities and opportunities for the demersal species covered by FMPs are likely to remain similar to previous years, subject to changes in quota and TAC which are outside the remit of the FMPs. In 2024, the value of demersal stocks landed by the UK fishing fleet was £182.9 million. A breakdown by individual FMP is outlined in Table 1 above. £152.5 million (83%) of this was landed by Scottish vessels, with a further £30.1 million (16%) landed by English vessels, and the remainder by Welsh and Northern Irish vessels (<1%).

## **Other impacts**

### **Compliance and Resourcing Impacts**

There are likely to be differing levels of compliance and resourcing costs incurred by Scottish Government (and the other relevant authorities) associated with each option.

Option 1 would likely involve compliance and resourcing costs for fisheries policy authorities additional to those currently incurred. These costs would be incurred through the process of implementing new FMP policy measures and ensuring compliance with such measures. The magnitude of these costs depends on the specific measures introduced, with more complex measures requiring greater and more specific compliance incurring a greater cost.

Option 2 is unlikely to generate any additional compliance and resourcing costs beyond those already incurred by current compliance and resourcing plans. However, it should be noted that by pursuing Option 2 and not publishing demersal FMPs the Scottish Government (and the other relevant authorities in the UK) would fail to meet its legal obligation under the 2020 Act and JFS requiring publication of the FMPs. If there was an intention to pursue Option 2, of not publishing the FMPs, amendments to the JFS would be required and additional resource would be required for this.

### **Environmental Impacts**

There are likely to be differing environmental impacts realised as a result of pursuing each option.

Option 1 is likely to generate environmental benefits associated with sustainable stock management and improving the evidence base underpinning management decisions. However, there may be environmental costs associated with the FMP measures implemented via Option 1, such as the displacement of fishing effort and other unforeseen factors, which could detract from any environmental benefits generated. As the specific measures are yet to be confirmed, the extent to which environmental costs and benefits will be realised is unknown.

As a continuation of the status quo, Option 2 involves no additional efforts to manage stocks sustainably, or improve the existing evidence base that may facilitate greater management decision making. As such, it is likely that this option would incur environmental costs associated with current fishing activities, represented by a potential decline in stock health and abundance through overexploitation and no improvement in the existing evidence base underpinning management decision making.

### **Scottish firms' international competitiveness**

The FMPs are not expected to have a significant impact on the Scottish businesses ability to compete internationally, nor will it affect Scotland's attractiveness as a destination for global capital investment. The FMPs are intended to support sustainable and responsible fisheries management, which in turn supports healthy fish stocks and a sustainable fishing industry. This will help ensure that businesses remain competitive and have a strong international reputation and consumer confidence.

## **Small business impacts**

There are unlikely to be any (disproportionate) direct impacts on small businesses due to publication of FMPs. As of 2023, the Scottish demersal fishing fleet consisted of 165 active vessels. Just over half of these (91 vessels, 55%) were over ten metres in length, with vessels ten metres and under totalling 74 or 45%. The most common fishing method for the ten metres and under segment was wrasse traps (50 vessels), followed by demersal lines (15 vessels). The over ten metre segment was dominated by demersal single trawls (46 vessels).<sup>4</sup> Note that – although smaller vessels tend to have smaller crews – vessel length does not always correlate with business size.

However, in most cases further policy development work will be needed for any new actions, which could include further evidence gathering or public consultation, along with the completion of appropriate impact assessments. Many of the actions are already underway and part of multi-year delivery programmes, and their development has also been subject to public consultation and appropriate impact assessments carried out by Scottish Government and the other relevant authorities, as required (such as BRIA).

In terms of the make-up of the groups affected, they are most likely small and micro business. The definition of small and micro business based on employing less than 50 FTE from the Small Business, Enterprise and Employment Act 2015<sup>5</sup>. Every business in the Marine Fishing standard industry classification would be a small or micro business, as all employ less than 50 FTE<sup>6</sup>. As marine fishing business are the most likely to be affected by the FMPs, the main group affected will be composed of small and micro business.

## **Investment**

There are unlikely to be any direct impacts to make Scotland (or wider UK) a more, or less, attractive place for global investment.

## **Workforce and Fair Work**

There are unlikely to be any direct impacts affecting the workforce.

The FMPs will not have any direct impact on Fair Work First principles.

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<sup>4</sup> Scottish Government, 2025. [Scottish Sea Fisheries Statistics 2023 - corrected March 2025](#).

<sup>5</sup> [Small Business, Enterprise and Employment Act 2015](#)

<sup>6</sup> [UK business: activity, size and location - Office for National Statistics](#): 2024, table 4

## **Climate change/ Circular Economy**

There are unlikely to be any direct impacts affecting climate change/ circular economy. FMPs set out our approach to increasing or maintaining sustainability of fish stocks and as additional evidence is developed, this will help fisheries managers to respond to changes in the status of stocks.

The demersal FMPs acknowledge there are already changes to the distribution and size composition of demersal stocks as a result of climate change, but the overall impacts are not yet fully understood. Specific policies and actions within the demersal FMPs look at how the fishing industry can be supported to adapt to the impact of climate change. This includes actions on wider research to identify impacts of climate change on fisheries, including their links within the wider ecosystem, as well as identifying the impacts of the fisheries on the marine environment. Further research will be required to predict the scale of impacts on the environment and over what timeframe this will be applicable to the demersal FMPs.

As our evidence base grows, we will understand better the specific impacts of climate change on the demersal species covered by these FMPs, and the scale of change required to support vessels fishing for these species to reduce their emissions and also adapt to changes in stocks and general fishing conditions. These actions are likely to adjust over time and will become more refined.

Possible measures which could support the sector's contribution to the UK's climate targets or promote Circular Economy, are already in development and / or being delivered. The FMP will support these measures, although it is not directly introducing or delivering them.

## **Competition Assessment**

### **Will the measure directly or indirectly limit the number or range of suppliers?**

Demersal FMPs are unlikely to limit the number or range of suppliers.

### **Will the measure limit the ability of suppliers to compete?**

Demersal FMPs are unlikely to limit the ability of suppliers to compete.

### **Will the measure limit suppliers' incentives to compete?**

Demersal FMPs are unlikely to limit suppliers' incentives to compete.

### **Will the measure affect consumers' ability to engage with the market and make choices that align with their preferences?**

Demersal FMPs are unlikely to affect consumers' ability to engage with the market and make choices that align with their preferences.

### **Will the measure affect suppliers' ability and/or incentive to introduce new technologies, products or business models?**

Demersal FMPs are unlikely to affect suppliers' ability and/or incentive to introduce new technologies, products or business models.

Finally, it should be noted that while no impacts are expected, in most cases further policy development work will be needed for any new actions, which could include further evidence gathering or public consultation, along with the completion of appropriate impact assessments. Many of the actions are already underway and part of multi-year delivery programmes, and their development has also been subject to public consultation and appropriate impact assessments (such as a policy-specific BRIA).

## **Consumer Duty**

### **What is the proposal trying to achieve?**

The proposal is to publish FMPs for 11 demersal stocks as required by the 2020 Act 2020 and the JFS. FMPs set out the policies designed to restore one or more stocks of sea fish to, or maintain them at, sustainable levels or to contribute to that restoration or maintenance. Where there is not sufficient scientific evidence for MSY, plans will also consider steps to obtain scientific evidence for this. Each plan will specify the stock(s), type of fishing and the geographic area covered. Each FMP will also identify the measures that could be used to deliver its policies. Such measures may include both existing or new regulations, statutory instruments, technical measures, or non-statutory routes such as research plans, voluntary agreements, or codes of conduct. The precise mechanisms used will depend on the policies set out in the plan and, where appropriate, will be enforced by the relevant national fisheries authority. The proposed measures could be regulatory or deregulatory, and positive or negative to business

### **What are the impacts on consumers?**

Demersal FMPs are unlikely to have any impact on consumers.

### **Is it likely that harm will be experienced by consumers as a result of this proposal?**

Consumers are unlikely to be harmed as a result of demersal FMPs.

### **What alternative proposals are there than can improve outcomes for consumers and/or reduce harm to consumers?**

Not applicable.

### **How do these alternative proposals compare to the original proposal?**

Not applicable.

## **Section 4: Additional implementation considerations**

### **Enforcement/ compliance**

The UK fisheries authorities have a range of powers in place to enable them to effectively enforce relevant fisheries legislation. Many of the actions contained within the FMPs relate to well-established and existing regulatory and management practices, which are enforced using a robust regulatory framework and utilising a range of compliance assets.

Where new measures are proposed, or are in the process of being implemented, for example fisheries management measures in MPAs, or additional gear technical measures, the development of these specific policies will consider what, if any, additional regulatory or compliance action is needed in order to support successful implementation of the policy.

# **UK, EU and International Regulatory Alignment and Obligations**

## **Internal Market/ Intra-UK Trade**

There is no expected impact on intra-UK trade. The FMPs will apply across relevant UK waters, and will be applied to UK (and non-UK) fishing vessels operating in these areas. Any measures that are implemented as a result of the FMPs will be applied on a level playing field basis, however, as noted elsewhere in this document, the FMPs themselves will not implement new measures. As such, the FMPs should not have any effect on downstream purchases or sales. FMPs have also been developed jointly with other UK fisheries administrations which have jointly agreed the policies and actions contained in these plans.

## **International Trade Implications**

There will be no impact on international trade into and out of Scotland from the implementation of Demersal FMPs. Domestic and foreign businesses will be impacted in the same way within Scottish waters.

Foreign vessel catches from UK waters which fall under a demersal FMP are highlighted in Table 2, with the total landings valued at £10.1 million. In 2024, these foreign vessels included vessels from France (£7.9 million), Spain (£2.0 million), Germany, Ireland, and the Faroe Islands. While these landings do (roughly) count as imports into the UK, we do not foresee these FMPs having disproportionate impacts on foreign vessel landings into the UK.

## **EU Alignment consideration**

Demersal FMPs are unlikely to impact on the Scottish Government's policy to maintain alignment with the EU. We have undertaken engagement and consultation with the EU on these FMPs and the EU are also invited to comment on public consultation.

The FMPs recognise and value the work we do with the EU and other Coastal States and place any action within the context of the international management framework that we have. Where relevant, the policies and actions contained within the FMPs reflect the context already in place under the EU's Multi-Annual Plans (MAPs). There is a strong emphasis on partnership working with Coastal States partners under bilateral and trilateral arrangements and also a recognition of the importance of development Long Term Management Plans.

The UK will continue to work in collaboration with the EU and other Coastal States to ensure they are involved throughout the process and that the policies and actions contained within the FMPs reflect the shared outcomes that we have.

## **Legal Aid**

Implementation of the demersal FMPs is unlikely to have any legal aid implications.

However, in most cases further policy development work will be needed for any new actions, which could include further evidence gathering or public consultation, along with the completion of appropriate impact assessments. Many of the actions are already underway and part of multi-year delivery programmes, and their development has also been subject to public consultation and appropriate impact assessments (such as BRIA).

## **Digital impact**

Implementation of the demersal FMPs is unlikely to have any digital impacts.

Any new actions contained within the FMPs will be taken forward following their publication and will be subject to further policy development work, including further evidence gathering or public consultation, along with the completion of appropriate impact assessments. Many of the actions are already underway and part of multi-year delivery programmes, and their development has also been subject to appropriate impact assessments (such as BRIA).

## **Business forms**

Implementation of the demersal FMPs is unlikely to bring any new forms for business to complete.

However, in most cases further policy development work will be needed for any new actions, which could include further evidence gathering or public consultation, along with the completion of appropriate impact assessments. Many of the actions are already underway and part of multi-year delivery programmes, and their development has also been subject to public consultation and appropriate impact assessments. (such as BRIA).

# **Section 5: Next steps and implementation**

## **Recommendations/ preferred options**

Based on the analysis, Option 1 - Publication of Demersal FMPs – is recommended.

## **Implementation considerations/ plan**

Subject to the consultation, it is proposed to publish the 11 Demersal FMP. This complies with the statutory obligation in the 2020 Act to prepare and publish the FMPs (the FMPs having been included in the JFS which was published in November 2022 and amended in December 2024).

The actions contained within the FMPs will be taken forward following their publication and will be subject to further policy development work, including further evidence gathering or public consultation, along with the completion of appropriate impact assessments. However, it is important to remember that many of the actions are already underway and part of multi-year delivery programmes.

Impact assessments will be completed by the relevant national fisheries authority, in line with each authority's individual assessment processes. Requirements for Scotland, Northern Ireland, Wales and England are set out below.

## **Scotland**

When developing policies the Scottish Government looks at impact assessments, assesses which ones are relevant to the policy and plans how to complete them as part of the process.

Any new management interventions will be screened and, where necessary, an appropriate assessment will be completed to ensure any actions or measures take before being implemented.

Some of the assessments which may require to be completed include:

- Strategic Environmental Assessment
- Business and regulatory impact assessment
- Data Protection Impact Assessment
- Equality Impact Assessment
- Islands Communities Impact Assessment
- Child Rights and Wellbeing Impact Assessment (CRWIA)

## **Northern Ireland**

The Rural Needs Act (Northern Ireland) 2016 was established to ensure that rural communities are fairly considered in the planning and delivery of public services and policies.

It imposes a legal duty on public authorities to actively account for rural needs when designing, revising, or implementing new policies.

This includes conducting Rural Needs Impact Assessments (RNIAs), integrating rural considerations into business cases and consultation documents, and publishing annual reports that demonstrate compliance.

## **Wales**

The Well-being of Future Generations (Wales) Act 2015 provides a framework for Welsh Governments approach to impact assessments within the seven Well-being Goals and five ways of working.

Welsh Government will carry out any necessary impact assessments before any measures are implemented. An Integrated Impact Assessment (IIA) will be developed to help Welsh Government undertake a comprehensive assessment of

the impact of a proposed action, with a view to maximising economic, social, cultural and environmental well-being, not just now, but for the long term. The Environment (Wales) Act 2016 also sets out national priorities which must be considered as part of the IIA process when setting new policy.

If new measures result in the introduction of subordinate legislation, Welsh Government will ensure compliance with requirements of the Welsh Ministers' Regulatory Impact Assessment Code for Subordinate Legislation when they are implemented.

## **England**

When producing policy and determining the need for impact assessments, the Better Regulation Framework guidance is taken into consideration. Where policies require a regulatory provision such as legislation, an options assessment or final stage impact assessment is undertaken and submitted to the Regulatory Policy Committee (RPC) for independent scrutiny. Such scrutiny will be in advance of introducing any secondary legislation for measures that are above the £10 million per annum threshold for net costs to business. This analysis is not required for measures below the £10 million equivalent annual net direct costs to business (EANDCB) threshold. For measures below this threshold Defra will, if appropriate, produce de-minimis assessments.

## **Post implementation review**

FMPs contain a number of policies and actions intended to ensure that stocks covered by the FMPs are fished sustainably with respect to an MSY approach and also to support improvements in the overall management approach.

ICES stock assessments assess how fish populations have changed over time and the effect fishing pressure is having on stocks. Key biological indicators are provided as reference points, which give indication towards their MSY, fishing pressure and spawning stock biomass. Fisheries policy authorities undertake a review of ICES stock assessments on an annual basis, to determine how stocks are performing against these reference points, and any other reference points provided within the advice.

The health of the stock will continue to be reviewed in this way as part of the ongoing negotiations cycle, utilising the ICES stock assessment process, and will also be reviewed on a more in-depth basis as part of the ICES benchmark process (which varies from stock to stock). The health of the stock will be the indicator used to monitor the effectiveness of the FMPs in managing the demersal stocks sustainably.

For some stocks for which there is insufficient evidence to determine MSY or a proxy for MSY, such as Atlantic cod and Northern Shelf ling, an increase in the available evidence to define and measure stock status will be an indicator of the effectiveness of the plan for the stock.

The policies and actions within each FMP will be reviewed as part of the three year review cycle for the JFS. In addition, as set out within the 2020 Act and the JFS,

FMPs will be reviewed at least every six years. An earlier review may be triggered in light of a change to relevant evidence, international obligations, or wider events. The decision to review earlier will be taken by the fisheries policy authorities. The review of the FMPs will include a report on individual policies and actions and whether they have been a) implemented and b) any known interactions between the actions and health of the stock.

# Declaration

## Sign-off for Partial BRIAs:

I have read the Business and Regulatory Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options. I am satisfied that business impact has been assessed with the support of businesses in Scotland.

I am also satisfied that officials have considered the impact on consumers as required by the [Consumer Scotland Act 2020](#) in completion of the Consumer Duty section of this BRIA.

Signed: Cabinet Secretary for Rural Affairs, Land Reform and Islands, Mairi Gougeon MSP

Date: 9 October 2025

Minister's name: Mairi Gougeon

Minister's title: Cabinet Secretary for Rural Affairs, Land Reform and Islands

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