

**CLYDE HERRING DELEGATED TAC 2019
RESPONDENT INFORMATION FORM**

This form **must** be returned with your response to ensure that we handle your response appropriately



1. Name/Organisation

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3. Permissions - I am responding as...

Individual

/ Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate

Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

CONSULTATION QUESTION:

Do you have any views on the Scottish Government's proposal to set the 2019 Clyde Herring TAC at 583 tonnes?

Comments:

SIFT welcomes the opportunity to respond to the consultation on Clyde Herring delegated TAC for 2019.

SIFT does **not** agree that the Clyde Herring TAC for 2019 should be set at 583 tonnes (rollover). SIFT recommends that the TAC should theoretically be set at zero. However, in practice- to allow the Clyde fleet to abide by the requirements of the EU Landing Obligation- a small 'bycatch allowance' should be set for each vessel wishing to operate in the Clyde herring stock maritime area. We set out our reasoning below:

- **Clyde herring biomass estimates are incomplete:**

The associated documentation provided alongside this respondent form concisely sets out the obligations on Scottish Government with regard to the Quota Regulation (TQR) (Council Regulation 2019/1241), which states:

'Article 6 of the TQR requires that the TAC determined by the UK shall: (a) be consistent with the principles and rules of the Common Fisheries Policy, in particular the principle of sustainable exploitation of the stock; and

(b) result;

(i) if analytical assessments are available, in the exploitation of the stock consistent with maximum sustainable yield from 2019 onwards, with as high a probability as possible;

(ii) if analytical assessments are unavailable or incomplete, in the exploitation of the stock consistent with the precautionary approach to fisheries management."

[Emphasis SIFT's].

SIFT does not believe that the Scottish Government's proposal to set a TAC of 583 tonnes is consistent with Article 6 (b) (ii), given that biomass estimates are incomplete for 2018 (as noted in the consultation document). Analytical assessments for 2018 are particularly imperative when setting a TAC for 2019, given that, as is typical of many pelagic species, the Clyde herring fishery is largely dependent on one year class at a time¹.

- **Clyde herring biomass remains predominantly composed of young immature individuals:**

The consultation documentation is very clear that a significant proportion of the Clyde herring biomass is composed of young, immature individuals and that it is not known if these juvenile herring are spawning within or outwith the Clyde. Consequently, the minority adult proportion of Clyde herring stock must be protected in 2019 to allow any chance for recovery of stock in future years.

¹ Thurstan RH, Roberts CM (2010) Ecological Meltdown in the Firth of Clyde, Scotland: Two Centuries of Change in a Coastal Marine Ecosystem. PLoS ONE 5(7): e11767. doi:10.1371/journal.pone.0011767

- **Landings have been zero for the years 2015-2019 inclusively:**

It is very concerning that despite a TAC of 583 being set for 2015-2018 inclusively, there were no recorded landings of Clyde herring over that four year period. As noted in the consultation documentation, wider drivers may be at play. Further research on the potential causes of poor recruitment to the fishery should be undertaken prior to any opening of the fishery. Additionally, SIFT has concerns that vessels may be targeting the Clyde herring fishery but misreporting the area from which the fish have been taken.

SIFT would like to make the following additional comments regarding the management of the Clyde herring fishery:

1. Research suggests that the Clyde herring stock is composed of two discrete populations; one of which spawns within the Clyde sea area (in the spring) and a second which spawns in autumn, outwith the Clyde sea. Given that fishing effort cannot discriminate between these two populations it is imperative that Scottish Government take into account the health of both stocks when considering the suitability or otherwise of opening the fishery in any one year. Scottish Government must take account of the Precautionary Principle in the absence of a fuller understanding of these stocks;
2. Historically, the Clyde herring fishery provided significant economic benefit to the Clyde fishing industry. Scottish Government should be developing and implementing management measures to improve the state of the stocks. In particular, consideration must be given to measures which would protect habitats vital to herring, particularly those which have been shown to act as nursery grounds.² For example, as noted by Corten *et. al* (1999)³ ;

'Herring abandon and repopulate spawning grounds; absence of spawning in any particular year does not mean that the spawning ground is not required to maintain a resilient herring population.'

Habitat protection and where possible, restoration, is a key prerequisite for healthy finfish stocks and Scottish Government must ensure that the Clyde Marine Region Plan includes objectives and policies which address this issue and in doing so adheres to the Scottish National Marine Plan's Objective 5 which states *'Management of sea-fisheries [should be] on a regional sea-basin ecosystem basis with ...where appropriate ecosystem-based management of inshore fisheries'*.⁴

SIFT notes that Scottish Government consider the existing control measures on the fishery are sufficient to justify reopening the fishery this year. Notwithstanding our comments above, if the fishery is to open in 2019, an additional condition of licence should include remote electronic monitoring when participating vessels are within the Clyde herring sea area. Such a control measure would bring the fishery in line with the

² Thurstan RH, Roberts CM (2010) Ecological Meltdown in the Firth of Clyde, Scotland: Two Centuries of Change in a Coastal Marine Ecosystem. PLoS ONE 5(7): e11767. doi:10.1371/journal.pone.0011767

³ From <http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2014/2014/her-vian.pdf> (accessed 05/07/2019)

⁴ <https://www.gov.scot/publications/scotlands-national-marine-plan/> (accessed 04/07/2019)

commitment in the Scottish National Marine Plan⁵ to move *'towards a system of monitoring total removals from the sea, reducing unwanted catches and minimising discards, [which] will be key priorities for fisheries management over coming years. These may lead to changes in spatial fishing patterns and entail significant developments in the scientific evidence base for managing fisheries'*.

In the Clyde herring fishery, SIFT recommends full video monitoring of the catch, which would not only ensure a high level of compliance but would also provide invaluable fishery-dependent data to improve understanding of the Clyde herring populations.

⁵ <https://www.gov.scot/publications/scotlands-national-marine-plan/> (accessed 04/07/2019)