

Wild Wrasse Harvesting: Consultation on Proposed new Mandatory Fishing Measures

Consultation Response Guide - April 2020

This document is aimed at stakeholders who wish to respond to the Wrasse Harvesting Consultation. It provides background information on the Scottish wrasse fishery and possible responses for respondents to consider for each of the consultation questions.

Overview

Live wrasse have been increasingly sought by Scottish salmon farms to act as 'cleaner fish' for the removal of sea-lice as a biological alternative to anti-parasitic chemical treatments. This has led to a rapid rise in their wild capture. The fishery is currently managed under voluntary measures. SIFT considers these measures to be inadequate, and has campaigned to introduce tighter management measures, which should be mandatory.

Key information on the consultation

- **The Scottish Government launched *Wild Wrasse Harvesting: Consultation on Proposed new Mandatory Fishing Measures* on 13th March, 2020.**
- Consultation responses should be made via The Scottish Government's consultation hub, available here [Wrasse Management Consultation](#)
- **The deadline for responses to the consultation has been extended to Sunday 10th May 2020 (originally it was Friday 10th April, a date which, confusingly, continues to be stated on some pages of the Marine Scotland website).**
- Before responding, stakeholders should read Marine Scotland's [consultation paper](#) which sets out The Scottish Government's rationale for its proposed new management measures, and also includes a full extract of the voluntary fishery management measures which have been in place since May 2018.
- The format of the consultation form does not provide for comments to be included for Question 1. One free-form box is available at Question 2 of the consultation (which asks for views on wrasse fishing permit eligibility). **This Question 2 comment box may be used to accommodate your response to ALL of the consultation questions.**
- **Marine Scotland will also accept additional comments that cannot be accommodated in the consultation form, on an email to the [inshore mailbox \(Inshore@gov.scot\)](mailto:inshore@gov.scot)**
- **IF YOU HAVE ALREADY RESPONDED BECAUSE YOU UNDERSTOOD THE RESPONSE DEADLINE WAS 10TH APRIL, BUT WISH TO ADD FURTHER COMMENTS YOU CAN STILL SUBMIT AN EMAIL WITH ADDITIONAL COMMENTS TO THE INSHORE MAILBOX**
- If you have any questions, please email SIFT at info@sift-uk.org.

Background

Wrasse are a family (*Labridae*) of sea fish species which inhabit rocky reefs and kelp bedsⁱ in Scotland's coastal waters. They are widely held to be keystone species in these ecosystems. They feed upon crustacea and molluscs and play a vital role in controlling parasites which predate upon other fish, including commercial species, or habitat-forming flora such as kelp. In addition to their important ecological function, wrasse are of high socio-economic importance particularly to recreational divers and sea anglers on account of their striking visual appearance.

Cuckoo Wrasse



The Scottish wrasse fishery

Historically, wrasse species were not targeted by Scottish fishermen on a commercial scale. In recent years however, effort in the wrasse fishery has increased dramatically, in order to fulfil the growing demand from the salmon aquaculture industry.

Since the beginning of the wrasse-fishing season in May 2018, management has been implemented via a system of **Voluntary Measures**ⁱⁱ. The Voluntary Measures were developed by Marine Scotland, working closely with the Scottish Salmon Producers Organisation.

In November 2018, Scottish Parliament's Rural Economy and Connectivity Committee recommended in its report on Scottish Salmon Aquacultureⁱⁱⁱ that the Scottish Government consider the need for regulation of cleaner fish fishing to preserve wild stocks and avoid negative impacts in local ecosystems.

In November 2019, following calls for the implementation of more stringent management measures by a range of stakeholders (including SIFT), Fergus Ewing MSP - the Cabinet Secretary for Rural Economy and Connectivity - announced an internal review (within Marine Scotland) of the voluntary measures. This current consultation is in response to that internal review.

SIFT's position: an overview

Since the introduction of the Voluntary Measures in May 2018, SIFT has advocated the introduction of tighter, evidence-based and mandatory wrasse fishery management measures. Such measures have been introduced in the south west of England, where wrasse are also caught to supply the Scottish salmon farming industry. These English measures (which include species-specific Minimum and Maximum Landing Sizes, spatial closures to protect vulnerable habitats, and temporal closures which ensure the fishery does not occur in the wrasse breeding season), were partly drawn from data from Scandinavia and Ireland.

SIFT believes that these examples of good fishery management should be adopted in Scotland, and that the present Marine Scotland consultation should provide an opportunity for stakeholders to make this case. This is especially important given that the recent internal review of management measures failed to engage with stakeholders other than the salmon farming industry and wrasse fishermen.

Further information from SIFT on the wrasse fishery is available at <https://www.sift-uk.org/wp-content/uploads/2019/02/SIFT-Wrasse-MSP-Briefing.pdf>

This consultation

In this consultation, Marine Scotland proposes to introduce mandatory controls covering the reporting and practice of wild wrasse harvesting. Under proposed new arrangements, MS will issue to eligible wrasse fishermen a new permit which will set conditions for participating in the fishery. **SIFT agrees that mandatory controls should be implemented.**

However SIFT is extremely concerned that there are no proposals to tighten the existing inadequate management measures relating in particular to Minimum and Maximum Landing Sizes, Spatial Management and Temporal Management (i.e. the fishing season).

RESPONDING TO THE CONSULTATION

The format of the consultation makes it difficult for respondents to convey the meaning of their answers especially in respect of the 'yes/no' questions on the online respondents' form at Question 1. SIFT believes it is important that respondents' reasons for their answers are made clear, and therefore encourages respondents to explain their responses in additional comments.

We therefore recommend respondents undertake the following two-step process:

STEP 1 Answer 'yes/no' options in questions 1 & 2 online

We set out below SIFT's recommendations for responses to the online consultation questions

1. Do you agree that the mandatory fishing controls set out below should be introduced for wild wrasse harvesting?

	Yes	No
Season closing dates, 1 December to 1 May	<input type="radio"/>	<input checked="" type="radio"/>
Minimum and Maximum landing sizes.	<input checked="" type="radio"/>	<input type="radio"/>
Only traps specifically designed to target and catch live wrasse and ensure their welfare will be used.	<input checked="" type="radio"/>	<input type="radio"/>

Otter exclusion devices, such as a fixed-eye aperture, will be used at the entrance to the trap and traps must feature escape hatches



Traps to be lifted at a maximum rate of 6 metres per minute



Traps should not be deployed / lifted when the water temperature is >17°C.



A maximum of 250 traps per vessel may be deployed



Requirement to accept observers if requested



Requirement to have REM or other appropriate inshore vessel monitoring if requested



2. Do you agree the eligibility criteria for permit applications as set out above?

► Eligibility criteria for new permit applications

- Yes
 No

Please explain your answer.

(set out your explanation for your answer within your additional comments email)

STEP 2 Explain your answers on a separate document which can be emailed to Marine Scotland

Assuming you have responded to the online questions as above, the Table below provides supporting statements and additional comments that you may wish to consider in your response – **either in the ‘open box’ in Question 2 or by an additional email to the inshore mailbox Inshore@gov.scot** .

	Proposed Measure	Supporting Statements/ Additional Comments
Question 1: Mandatory fishing controls:	Season closing dates, 1 December to 1 May	<p>SIFT does not agree that the season should run as proposed because:</p> <ul style="list-style-type: none"> • Commencing the fishing season on 1st May risks wrasse being caught during their breeding season. • There is evidence that the breeding season extends to at least the end of May. • Wrasse go into a state of hibernation in winter months when the water is colder, so are unlikely to be readily caught, or to be of significant use to the salmon farming industry during winter months. • These temporal measures (i.e. length of the fishing season) appear to be determined by the demands of the salmon farming industry, rather than the eco-system approach to fishery management to which the Scottish Government is committed. • The fishing season should start on 1 June and close on 1 December.
	Minimum and Maximum landing sizes.	<p>SIFT agrees that there should be Minimum and Maximum Landing Sizes but:</p> <ul style="list-style-type: none"> • The minimum landing size for Ballan wrasse should be increased to 15cm, as some salmon farmers report extremely high mortality (within salmon cages) of Ballan wrasse at lengths of below 15cm. • Wrasse species’ have high vulnerability to size related exploitation due to the fact that they are protogynous hermaphrodites (i.e. smaller individuals are female that become male when at a sufficiently large size). As a result, size-based exploitation poses a risk to the sex ratio and presents a further risk to reproductive success.
	Only traps specifically designed to target and catch live wrasse and ensure their welfare will be used.	<p>SIFT agrees that only specifically designed traps should be used, but:</p> <ul style="list-style-type: none"> • How will this be enforced? • What sanctions will there be on fishers who are found to use inappropriate traps?
	Otter exclusion devices, such as a fixed-eye aperture, will be used at the entrance to the trap and traps must feature escape hatches	<p>SIFT agrees that otter exclusion/escape devices should be required, but:</p> <ul style="list-style-type: none"> • How will this be enforced? • What sanctions will there be on fishers who are found to use inappropriate traps?
	Traps to be lifted at a maximum rate of 6 metres per minute	<p>SIFT agrees that there should be a maximum lift rate of 6 m/m, but:</p> <ul style="list-style-type: none"> • How will this be enforced?

		<ul style="list-style-type: none"> What sanctions will there be on fishers who exceed the maximum lift rate?
	Traps should not be deployed / lifted when the water temperature is >17°C.	<p>SIFT agrees that traps should not be deployed above 17°C, but:</p> <ul style="list-style-type: none"> How will this be enforced? What sanctions will there be on fishers who do not meet this requirement?
	A maximum of 250 traps per vessel may be deployed	<p>SIFT agrees that there should be mandatory effort control measures in place, but:</p> <ul style="list-style-type: none"> A limit is also needed on the number of vessels which participate in the fishery Furthermore, some fishers are understood to lift traps on more than one occasion per day, which undermines the value of the trap number limit. So Mandatory Measures should also cover the frequency that traps are lifted. How will this be enforced? What sanctions will there be on fishers who do not meet this requirement?
	Requirement to accept observers if requested	<p>SIFT agrees that there should be increased monitoring of the fishery, through the use of observers, but:</p> <ul style="list-style-type: none"> What plans does Marine Scotland have to request observers?
	Requirement to have Remote Electronic Monitoring (REM) or other appropriate inshore vessel monitoring if requested	<p>SIFT believes that REM should be:</p> <ul style="list-style-type: none"> A mandatory requirement on all fishing vessels. There is no adequate baseline data for the wrasse fishery, for example no stock assessment has been undertaken. REM would assist the fishery to become evidence-based, in line with best practice. The Scottish Government announced in February 2020 that the inshore scallop dredge fleet will be equipped with REM systems. The wrasse fishery should also be required to install REM.
Question 2: Eligibility	Proven track record of wrasse harvesting and submitting returns over the last 2 years Evidence of having an appropriate contract with a salmon farm operator to supply wrasse. (All fishermen currently supplying wrasse must be under contract with a farm and the contract binds them to the voluntary measures).	<ul style="list-style-type: none"> It is vital that Marine Scotland tightly controls the number of wrasse-fishing permits it issues. However, under the current voluntary arrangements, Marine Scotland cannot accurately determine the number of fishers with a proven track record. So Marine Scotland should set a maximum number of permits for each fishing season. It is desirable that fishers have an appropriate contract with a salmon farm operator. SIFT understands that under the current Voluntary Measures transfers of wrasse from fishing vessels directly to salmon farms are not being recorded as 'landings'. It is vital that the reporting of such fishing vessel to salmon farm transfers be included in landings data.
	Marine Scotland may also consider additional permits for new entrants to the fishery.	Analysis of growing salmon farm demand for cleaner fish (both wrasse and lumpfish) projects that by 2020 up to 10 million cleaner fish per year will be needed ^{iv} by the salmon farming industry in Scotland. Wrasse fishing is lucrative, and fishers from other sectors may be

		<p>attracted to the fishery. So, in conjunction with an upper limit on permit numbers:</p> <ul style="list-style-type: none"> • New entrants should only be admitted when existing permit holders forfeit entitlement.
Additional comments	<p>If you wish to make additional comments, you may wish to consider the following issues:</p> <p>The Consultation fails to conform to Scottish Government Consultation Guidelines The Scottish Government's consultation guidelines state that: "each closed question should also have an 'other' box" Question 1 of the consultation fails to do this.</p> <p>The Consultation has pre-empted the publication of relevant research by SNH Scottish Natural Heritage reported to the REC Committee in May 2018 that it is undertaking research into 'interactions between the wrasse fishery and protected sites/species' http://www.parliament.scot/S5_Rural/General%20Documents/SNH_written_evidence_to_REC_on_salmon_farming_in_Scotland_-_May_2018.pdf. SIFT understands that this research is due to be published imminently, and that it would have been vital to informing responses to the consultation. Respondents to this consultation should clearly have had access to this information prior to completing their responses.</p> <p>Spatial Management in designated habitats Wrasse are important species for protected marine habitats, specifically, rocky reefs protected in Special Areas of Conservation (SACs) and kelp beds in Nature Conservation MPAs, and so require protection in law. In particular:</p> <ul style="list-style-type: none"> • The association between wrasse and protected habitats within SACS means the fishery may breach Article 6 of the Habitats Directive, which requires Ministers to take '<i>the necessary conservation measures involving ... appropriate statutory, administrative or contractual measures which correspond to the ecological requirements of the natural habitat types</i>' in the context of '<i>the long-term survival of its typical species</i>'. [SIFT underlining] • Section 82 of the Marine (Scotland) Act 2010 may also require action to manage wrasse living in kelp forests within Nature Conservation MPAs, via the obligation on a public authority to exercise functions '<i>in the manner which it considers best furthers ... the stated conservation objectives for the ... MPA</i>', which, via regulation, includes ensuring '<i>its structures and functions, its quality, and the composition of its characteristic biological communities are ... in a condition which is healthy and not deteriorating</i>' [SIFT underlining] <p>Accordingly, SIFT believes that as a minimum, the wrasse fishery should not be permitted in SACs where rocky reefs are protected or qualifying features, and in Nature Conservation MPAs in which kelp and seaweed communities are designated Priority Marine Features.</p>	

ⁱ Dipper, F., 2001. *British sea fishes* (2nd edn). Teddington: Underwater World Publications Ltd.

ⁱⁱ Marine Scotland, Voluntary control measures for the live capture of Scottish wild wrasse for salmon farms, May 2018 <https://www2.gov.scot/Resource/0053/00535142.pdf>

ⁱⁱⁱ <https://digitalpublications.parliament.scot/Committees/Report/REC/2018/11/27/Salmon-farming-in-Scotland> (accessed 02/04/2020)

^{iv} Powell, A; Tresurer, J; Pooley, C; Keay, A; Lloyd, R; Imsland, A; Garcia de Leaniz, C. 2017 Use of lumpfish for sea lice control in salmon farming: challenges and opportunities. *Reviews in Aquaculture*. (2017) pp, 1-20.