



WWF *for a living planet*

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Parliamentary briefing: Fisheries

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Introduction

In his closing comments in the parliamentary debate on sea fisheries in November 2008, Richard Lochhead stated “The five most valuable stocks in Scotland are all being fished sustainably in Scotland or are on the road to recovery”. This is great news, but it must be placed in context. This is only a fraction of the 25 or so stocks that are exploited commercially in Scottish waters. Many of these are at levels evaluated by scientists as “*below safe biological limits*”, and even stocks such as the North Sea cod, that are showing signs of recovery still have a long way to go to be able to be classified as being exploited sustainably. Furthermore the recovery of North Sea cod remains based on the growth of a single strong year class, that of 2005, rather than a greater abundance of fish. This highlights the need to maintain precautionary exploitation levels, to ensure this year class can mature, spawn and contribute to the future of the stock.

Scotland has already taken a leading role in fisheries conservation by setting up and implementing the Conservation Credits Scheme. This ground-breaking scheme brings together decision makers (government), end users (the fishing industry) and other stakeholders (including scientists and NGOs) to decide on acceptable means of implementing challenging conservation measures to ensure the future sustainability of the Scottish demersal fleets. In the December Fisheries Council in 2008 many of the measures already in place in Scotland under the Conservation Credits Scheme were transposed into the revised European Cod Recovery Plan, a plan that has been assessed as being consistent with the precautionary approach by ICES “*if implemented and enforced adequately*”¹. WWF Scotland fully supports the measures being rolled out under the Conservation Credits Scheme: this scheme must continue to be a priority in the future, enabling cod and other commercially important stocks to continue to recover. The measures set out in the Cod Recovery Plan must be adhered to; renegotiation is not an option if cod recovery is to continue. Not only would renegotiation of the plan undermine the leadership role Scotland presently holds in European waters as one of the most forward looking dynamic fishing industries in terms of the long term sustainability of stocks, and therefore of the fleet, it would also undermine the future sustainability of the fishing fleet.

In support of taking this long term approach a recent study by WWF² shows that if cod stocks are allowed to recover, there are both economic benefits and reduced economic uncertainty. It is therefore essential to temper harvesting at the first sign of recovery in favour of longer term targets. In last year’s debate Richard Lochhead stated that it is the government’s objective to ensure the livelihood of “not only today’s fishermen, but future generations”. The long term livelihood of fishing communities can only be realised based on a healthy ecosystem.

Discards remain a huge problem in Scottish waters and means of reducing them must be forthcoming. Although initial data from 2009 are encouraging for some stocks, for other stocks the situation continues to be worrying³. The reduction in cod discards seen in the North Sea is a direct result of the conservation measures implemented under the Conservation Credits Scheme, including spatial closures, technical

¹ ICES WGNSSK REPORT 2009 available at <http://www.ices.dk>

² Banking on cod - Exploring economic incentives for recovering Grand Banks and North Sea cod fisheries available at <http://www.panda.org/?uNewsID=167161>

³ Pers. comm. Nick Bailey, Marine Scotland Science



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conservation measures and onboard observers. This proves the measures work, but need to be extended to protect further stocks or areas.

- Spatial and temporal closures - WWF Scotland commends the work done by Scotland on real time (RTC) and seasonal closures, and believes these measures should be extended to other species (in particular haddock and whiting on the West Coast of Scotland), and collaboration with other countries under the Cod Recovery Plan must continue.
- Technical conservation measures - In Scottish waters many vessels are already using selective gear and considerable work has been done trialling new more locally acceptable options. It is now time to move forward from trials towards the wide spread adoption of selective gears, which should be made mandatory in all boats which catch cod (as a target or bycatch species). This is particularly relevant given that now, as vessels reach close to 90% of their cod quota, rather than adopting selective gear, they are reportedly increasing discard levels.
- Independent on-board observers/CCTV - WWF Scotland has long advocated the use of onboard observers as an important tool in fisheries management⁴. Fully documenting fishing trips helps combat data deficiency and provides records of total catch and levels of discards, all of which contribute to improved scientific advice. Observer coverage should be adequate to provide information on all segments of the fleet. New technology makes the deployment of observers, in the form of onboard cameras, easier and more economically viable. WWF Scotland welcomes the initial trials started this year and hopes that this technology will be adopted widely by the Scottish fleet in 2010.
- TACs and quotas - At present the uptake of TACs is measured only by landed catch, paying little attention to the levels of fish actually caught and the fraction discarded. WWF Scotland believes quotas should set limits on the total amount of the species or population that can be removed, whether that catch is subsequently landed or discarded. WWF Scotland therefore welcomes the Aalborg declaration, signed by Scotland, the UK, Denmark and Germany in October⁵ and believes this approach of catch quotas must be adopted across the EU. Absolute catches can only be recorded in a fully documented fishery, highlighting the importance of observer data.

All of these measures are included in the recommendations laid out by Seafish in their report on “Profitable Futures for Fishing”⁶, reinforcing our belief that a healthy ecosystem is the only basis for a profitable fishery. Fisheries resources are a valuable commodity, and optimising market opportunities for fisheries products is essential. In 2009 prices for several species dropped leading to hardship in many sectors of the fishing fleet. However, WWF Scotland does not believe the solution to this problem is to increase landings, but rather maximum returns must be ensured for landings. Public perception is increasingly important in access to markets, and fish from stocks in a poor state, that are not exploited sustainably will suffer from reduced markets. Sustainably caught fish command a greater price than fish from stocks that are in a poor state. Exploiting stocks sustainably and reducing discards benefits not only the stocks themselves, but fishermen’s profits too.

Common Fisheries Policy Reform

The reform of the Common Fisheries Policy has been high on everyone’s agenda in 2009, This reform is timely, not only because the 2002 reform has done little to alleviate overfishing and its wider ecological footprint, but also because of the Marine Strategy Framework Directive (MSFD), which sets a challenging new context for fisheries management and requires that Europe’s seas achieve Good Environmental Status (GES) by 2020 at the latest. The CFP must not impede the delivery of GES, and

⁴ WWF Scotland . November 2006. Best practice and funding options for Observer Programmes around the world. - .available at http://assets.wwf.org.uk/downloads/observer_report01.pdf

⁵ Joint statement available at

http://www.fvm.dk/Admin/Public/DWSDownload.aspx?File=%2fFiles%2fFiler%2fEnglish%2fFisheries%2fJoint_statement_okt2009.pdf

⁶ Seafish..August 2009..Report on Profitable Futures for Fishing available at: <http://www.scotland.gov.uk/Topics/Fisheries/Sea-Fisheries/ScottishFisheriesCouncil/ProfitableFuturesforFishi>

'must take account of the environmental impacts of fishing'. Therefore, the ecological and conservation goals of the CFP must be prioritised in this reform.

WWF Scotland is working with the rest of the European WWF network, whose three priorities for CFP reform are: eliminating overcapacity, managing fisheries on an ecosystem basis and improving governance.

- **Overcapacity** - It is vital that a balance is achieved between fisheries resources and fleet capacity. Achieving this balance should form one of the mandatory targets in a formal Long Term Management Plan (LTMP). Each LTMP must have the requirement to assess capacity as part of the overall descriptor of the fishery, and where overcapacity is identified a capacity reduction strategy must be developed.
- **Ecosystem-based management** - Application of the precautionary principle and the need for an ecosystem-based approach to be at the core of the CFP must be strengthened. The reformed CFP must require all fishing activity to follow such an approach. This approach must be defined in an operational way. The CFP should outline and formalise the processes required at a regional sea level to deliver such an approach. This will encompass and extend the current Recovery Plans and LTMPs for stocks that set an explicit timetable and targets for recovery and/or management, including catch, effort and gear requirements as necessary.
- **Improved governance** - Decision making at the Council level must concentrate on setting overarching policy rather than micro-management. Decisions must be consistent with scientific advice, with priority given to assuring ecosystem health. In this framework, regional governance of fisheries must evolve to be accountable, transparent, representative and professional.

The Scottish government has already done considerable work on their response to the Green Paper, both through the Inquiry into the Future of Fisheries Management⁷, and through workshops and meetings with stakeholders. WWF Scotland hopes that this will translate into a clear commitment to an ecosystem-based approach in the reform, which will be implemented effectively. Harvesting of valuable marketable fish must be conducted with minimal impact on juvenile and spawning fish, non-target species, and marine habitats. Only by achieving sustainable management of Scotland's fish stocks will the secure future for the marine environment and the fishing industry be guaranteed.

Conclusions

The Scottish Government has already taken significant steps, working with industry and other stakeholders, to address the problems of sustainability in their fisheries. Nevertheless discarding remains high, so increased effort must be made to overcome this problem, most particularly with fleet-wide adoption of selective gears for all fisheries and the widespread adoption of onboard observers to fully document catches.

Each year at the EU December Fisheries Council a sustainable settlement for the UK and Scottish fleets is negotiated. What is often forgotten is that the mandate of all delegates is also to negotiate a sustainable settlement on behalf of the fish stocks themselves. Scientific advice is not a starting point to be negotiated down, it is there to inform decision-making. Setting quotas, on average, 48% higher than advised cannot be considered sustainable. The aims of ecological sustainability and socio-economic sustainability are not mutually exclusive. Ecological sustainability is a pre-condition for economic and social sustainability.

Finally, the Scottish government has already taken commendable steps, but must continue to build on these to inform CFP reform in order to deliver healthy fish stocks that will support a sustainable and profitable industry far into the future.

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⁷ Report available at <http://www.scotland.gov.uk/Topics/Fisheries/Sea-Fisheries/17681/common-fisheries-policy/future-fisheries-manageme>