Q1 WHAT IS THE KEY OUTCOME FROM THE NEGOTIATIONS THAT WOULD BEST SECURE THE SUSTAINABILITY OF FISHERIES?

The key sustainability outcome of the negotiations should be a co-ordinated fisheries management regime covering both EU and UK waters that is underpinned by best scientific advice. Such advice should be provided by an independent scientific body, such as the International Council for the Exploration of the Sea (ICES). The scientific advice should determine agreements on catch limits and quotas across all EEZs.

This outcome would place Maximum Sustainable Yield at the core of fisheries management and enable a continuation of recent progress with reducing overfishing across the North Sea and NE Atlantic. Without such an approach there is a possibility of overfishing by EU and UK fleets as they compete to catch stocks in line with their own unilaterally determined catch limits. This would be counterproductive and harmful to the fishing industry in the medium to longer term. The recent experience of the NE Atlantic mackerel fishery is a case in point: the EU, Norway and Iceland unilaterally increased quota and as a result the stock was overfished.

Q2 CONSIDERING THAT TRADE-OFFS MAY NEED TO BE MADE BETWEEN TARIFF-FREE ACCESS TO MARKETS AND UK PREFERENCES FOR ACCESS AND QUOTA ARRANGEMENTS, WHAT IS THE MOST IMPORTANT OUTCOME TO SECURE FOR SCOTTISH FISHERIES?

Tariff-free access (and absence of non-tariff barriers) would be more important than access and quota arrangements. This is because Scotland’s fishing fleet is dominated by its inshore shellfisheries. 74% (1557) of Scotland’s 2096 fishing boats are ‘Under 10s’ (less than 10m long).

These vessels almost exclusively target shellfish – principally prawns (aka Nephrops, langoustine or scampi) and scallops within the ‘inshore’ territorial zone up to 12NM from the coast. Of Scotland’s remaining 539 vessels, 346 also target shellfish but are over 10m in length - and also substantially operate in the territorial waters. In contrast Scotland’s over 10m demersal fishing fleet consists of 174 vessels and its pelagic fleet consists of just 19, albeit substantially larger, vessels.i With a 2019 landings value of £193m, shellfisheries are also of greater value than either demersal (£187m) or pelagic fisheries (£183m)ii.

Non-UK vessels will continue to be excluded from waters within Scotland’s 12NM limit after Brexit. So the inshore fleet will be largely unaffected by the outcome of any EU:UK negotiations regarding access arrangements. Similarly, quota arrangements are not the most important outcome to the inshore fleet: the two primary target shellfish species are prawns and scallops, and prawn quota is typically not fully utilised (56% uptake on West of Scotland in 2019)iii, whilst scallops are a non-quota species.
In contrast, the EU is the largest market for Scottish inshore fisheries. Accordingly, for this vital sector of the Scottish fishing industry, frictionless trade in the form of tariff-free access (and an absence of non-tariff barriers) is of greater importance than access and quota arrangements. It is clear that there is no universal panacea. What is good for offshore demersal and pelagic fishers with large quota holdings is often least good for small scale inshore shellfishers who lack such quota. Any resolution of this tension needs to take into account wider issues regarding socio-economic and environmental objectives of fisheries policy: SIFT believes that fisheries policy should include the objective of supporting sustainable employment and environmental recovery in coastal regions. Such aims can be achieved through domestic policy making – for example through the adoption of socio-economic and environmental criteria for allocating any additional quota arising from Brexit to the inshore fleet.

Q3 WHAT IS YOUR VIEW ON THE USEFULNESS OF ZONAL ATTACHMENT AS A PRINCIPLE FOR DIVIDING FISHING OPPORTUNITIES, ESPECIALLY FOR SCOTTISH FISHERIES?

Zonal attachment is not as useful a mechanism for allocating fishing opportunities as it might initially appear. It does not resolve questions regarding access to fish-stocks which straddle EEZs: approximately 100 species of fish are shared between EU and UK waters. These will require complex and co-operative management measures. Zonal Attachment is also vulnerable to changes in the distribution of stocks as a result of climate change or fishing pressure, so to function effectively it will in practice require regular re-basing.

It is also argued that zonal attachment may disproportionately benefit existing quota holders who already target quota species. These typically larger scale fishers, who have historically been less likely than small-scale fishers to land their catches into smaller coastal ports or to employ UK crew, would then be likely to benefit most from raised fishing revenues, profits, and wages. The corollary is that small scale boats (which across the UK make up 77% of the fishing fleet but hold only 1.5% of quota) that frequently target non-quota species (e.g. lobster, scallops) will benefit least from a zonal attachment approach to allocating fishing opportunities. Nevertheless, zonal attachment may have a part to play in the blend of principles that will be required to allocate fishing opportunities.

Q4 WHAT WOULD BE THE IMPACT OF NO AGREEMENT ON FISHERIES BETWEEN THE UK AND THE EU?

No agreement would result in an increase in tariff and non-tariff barriers. This would inevitably reduce revenues within the inshore fishery sector and pose significant threats to local coastal communities with high fisheries dependency. Although the fisheries catching sector never exceeds 3% of employment in any Scottish region (the three island regions are the most dependent), there are numerous individual coastal communities where the catching sector has materially greater employment significance.
SIFT is particularly concerned that the adverse impact of no agreement would be greatest on the static gear sector (which comprises 1337 of Scotland’s Under 10m fleet). This is because the static gear fishery sells live shellfish to EU markets. This makes this fishery most vulnerable to time-consuming delays at EU entry points – (because, inter alia, the shellfish will typically not survive lengthy delays in transit whilst waiting to enter the EU, and those that do survive would have a shorter shelf life and achieve lower prices as a consequence).

Furthermore, as static gear fisheries - unlike mobile gear fisheries - have essentially zero bycatch, lower carbon emissions (because they do not drag heavy nets or trawls) and cause minimal damage to the seabed ecosystem they are the most sustainable of Scottish fisheries, so they have the fewest adverse impacts on other marine users. Hence no agreement would not only adversely impact inshore fisheries, but would also adversely impact other stakeholders, including the valuable Scottish marine tourism sector.

No agreement would also potentially have an adverse impact on the seafood processing sector. This sector, which supports some 8900 FTEs in Scotland (roughly double the 4886 employed directly in the fish catching sector) would be at risk of severe disruption if it was unable to access a European workforce, given that in 2018, 59% of those employed in the sector in Scotland were from non-UK EEA countries.

---

i Provisional 2019 Sea Fisheries Statistics, Scottish Government, 2020
ii Ibid
iii Ibid