

Voluntary wrasse management measures - implications for Inquiry into Salmon Farming

Dear Mr Mountain, Convenor of REC Committee,

cc: Mr Dey, Convenor of ECCLR Committee,

We note the evidence gathering phase of your inquiry into salmon farming has effectively closed with the last evidence session taking place on Wednesday 9th May.

Open Seas did not submit evidence during that call, as our work focuses primarily on catalysing improvements in the sustainability of wild capture marine fisheries and the seafood harvested from them.

However, given our focus on wild-capture fisheries, we have kept a close eye on the emergence and poor regulation of the wrasse fishery, which has developed to meet the demand of the salmon aquaculture industry to tackle the considerable challenge of sea lice affecting salmon farms. Given the government has only this week (08/05/2018) announced voluntary measures, which it hopes will address this, we consider it appropriate to send this letter outside the call for evidence and noting the collaboration between your Committee and the ECCLR Committee.

As you will be aware, the wrasse fishery has boomed in recent years, such that Scottish salmon farm companies have resorted to sourcing wild wrasse from the south coast of England. However, given no real government oversight, the fishery has grown with no stock assessment, effort limitation or minimum landing sizes. In short, it has grown in an unregulated, non-precautionary and unsustainable way.

In response to these concerns, the Scottish Government and the salmon farm industry have recently attempted to resolve this worrying situation and published a suite of Voluntary Measures (attached) to address the potential over-exploitation of the stock. Whilst voluntary measures are better than no measures, we are concerned specifically by the apparent self-monitoring, lack of stock assessment or evidence base, and the handing of partial responsibility for a wild capture fishery to the salmon industry.

The following two points in the published voluntary measures raise particular concern.

5.2 A list of boats catching wrasse for supply to the salmon farming sector will be maintained by the SSPO

Wild fish are a public resource. The responsibility for management should fall to a public body and be subject to public scrutiny. This data should be gathered by or shared directly with Marine Scotland to ensure the Scottish Government has an understanding of the pressures on the stock to improve their regulatory oversight.

3.2. Supply information on numbers of under and over-sized fish returned, by species for the first 20 traps deployed each week

I.e. this requires that only partial catch data be provided.

6.2. As a minimum, [all fishermen catching wrasse need] to state the intention to meet the agreed voluntary measures

Meaning that vessels need only intend to meet the voluntary measures.

The requirement for an “intention to meet” these voluntary measures does not in our view provide a sufficiently robust regulatory framework to deliver confidence in the sustainability of this fishery. A voluntary and self-reporting approach does not tally with best practice in fishery management and we would be glad if you could note this concern as part of your inquiry or any other relevant scrutiny you may undertake in due course. We think Marine Scotland should be taking the lead role in the management of this fishery and managing it, sustainably, and for the best public good, like any other stock.

Kind regards,

Nick Underdown
Head of Communication and Campaigns, Open Seas