

**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

Community of Arran Seabed Trust (COAST)

Title: Mr Ms Mrs Miss Dr Please tick as appropriate

Surname:

Chandler

Forename:

Paul

2. Postal Address

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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

harriet.wilson@gov.sc

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:

Yes.

All the available evidence in the consultation document and that which commonly is presented to us at the Clyde 2020 meetings from the Research Advisory Group are consistent with the view that the Clyde herring are in desperate need of further protection and given every chance to recover if possible.

The data presented in the supplied consultation document clearly present a collapsed herring fishery and most fisheries would surely have been closed with a zero TAC under these circumstances.

With the current landing obligation of 100% of bycatch of quota species it will be interesting to see if this returns any herring to the Marine Scotland records as landed bycatch in the Clyde. However, rather than zero, to ensure that the EU landing obligation for herring, even if less than 5% of the individual vessel bycatch, continues we suggest that a TAC of only a few tonnes (e.g. 3 tonnes) is set which makes them unattractive to any vessel to target them. Only when the acoustic and trawl surveys show consistent numbers returning and there is clear data which indicates a MSY should there be any tapered introduction of a TAC which makes it attractive for a small number of vessels to target for a limited time.

There is also increasing evidence that indicate that the large number open cage fish farms in the Clyde are acting as fish aggregation devices for shoals of juvenile fish which enter the nets attracted by food, faeces and submerged lights. This may be having an adverse effect on any potential recovery of the herring stocks if shoals of juvenile herring are passing through the nets and interacting with diseased salmon and their faeces or becoming trapped in the nets as they grow. This has clearly been to shown to happen to herring in North America and Canada.

