CLYDE HERRING DELEGATED TAC 2021
RESPONDENT INFORMATION FORM

This form **must** be returned with your response to ensure that we handle your response appropriately

The Scottish Government
Riaghaltas na h-Alba

1. Name/Organisation

Community of Arran Seabed Trust (COAST)

Title: Mr ☐ Ms ☐ Mrs ☑ Miss ☐ Dr ☐ **Please tick as appropriate**

Surname:

Kay

Forename:

Lucy

2. Postal Address

Old Pavilion		
Lamlash		
Isle of Arran		
Postcode KA27 8LS	**Phone** 01770 600656	**Email** email@arrancoast.com

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

☐ ☑ **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**

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CONSULTATION QUESTION:

Do you have any views on the Scottish Government's proposal to set the 2021 Clyde Herring TAC at 583 tonnes?

Comments:

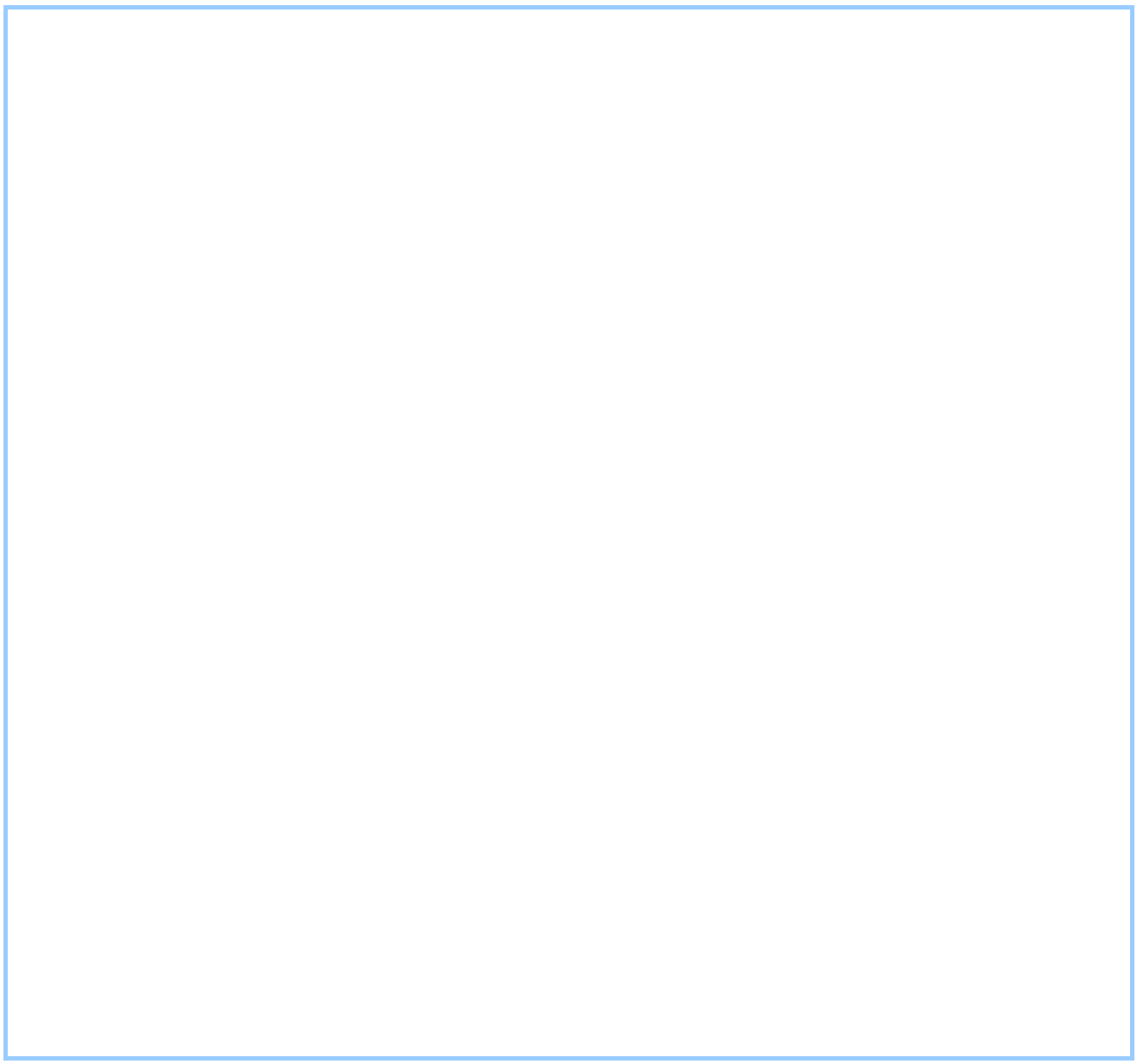
Yes.

All the available evidence, both in the consultation document and that which has been previously 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 consultation document supplied with this consultation clearly presents a picture of a collapsed herring fishery. Most fisheries would surely have been closed with a zero TAC under these circumstances?

There has been no recorded landing of herring since 2013 and knowledge of the stock indicates that it is a poor state with the young fish that are present not reaching the minimum landing size. This is not an indication of a healthy stock. We consider that there is very clear evidence that the TAC should be reduced, until such time that there is robust scientific data that herring numbers of fishable size have recovered to support a carefully managed, limited fishery with a precautionary TAC set as part of the management measures.

We do not agree that the 2021 TAC for Clyde herring should be set at 583 tonnes as a rollover from previous years and do not agree with the statement in the consultation document that there is no evidence to suggest that the TAC should be reduced. On the basis of zero landings for the past 7 years coupled with survey information about the herring stocks, there is a strong case for a zero TAC for herring in the Clyde. With the potential for bycatch of this species and consideration of landings obligations for bycatch of quota species, there is a case that could be made for a TAC of only a few tonnes (e.g. 3 tonnes) to be set, which would support any bycatch landings but restricts interest in a targeted fishery for this species until a time that the herring stock can be shown to have recovered sufficiently to support this.



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