Response ID ANON-KK9W-TWP4-N

Submitted to Herring in the Firth of Clyde - setting the total allowable catch for 2023
Submitted on 2023-06-08 16:54:07

Introduction

Proposed TAC

1 What is your view on the proposed TAC level for Clyde herring in 2023?

Please give your views on the proposed TAC in the text box below:

COAST welcomes the opportunity to respond to the TAC level for herring in the Firth of Clyde.

The information in the consultation document and available data present a picture of a herring stock that is in a very poor state, with dominance by young fish under the minimum landing size. There is no resilience within the herring stock and, as such, a precautionary approach to setting a TAC should be taken.

There is certainly no justification to increase the TAC for 2023. The consultation document clearly states that “Current knowledge of the stock is uncertain, and insufficient to be able to quantify a scientific basis for a TAC.”

Rather, on the basis of the available (lack of) evidence and what this shows, we consider that there is a very strong case for reducing the TAC, 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.

Given the uncertainty about the status of the stock and the lack of landings over the past 10 years we consider that there should be a substantial reduction in the TAC for 2023.

In 2022, a proposed precautionary buffer of a 20% reduction on the 2021 TAC (equating to a TAC in 2022 of 466 tonnes) was proposed and subsequently implemented. Based on the information presented in the consultation document we do not see any justification to increase the TAC in 2023 back to a TAC of 583 tonnes.

At the very least the 2023 TAC should remain at 466 tonnes, since there is no evidence presented that justifies an increase to this. The consultation document notes that setting a precautionary buffer, as was the case in 2022, mirrors the approach taken by ICES for some category 3-6 stocks, when the stock status is unknown.

However, given the poor state of the stock over recent years, the virtual absence of landings over the past 10 years, and significant uncertainty as to the state of the stock, there is a strong case for a much further reduced TAC, or zero TAC to be set for 2023. The fact that the state of other west of British Isles herring stocks are also in a poor state as reported in the consultation document, provides more weight to the rationale for setting a much more precautionary TAC.

With the potential for bycatch of this species and consideration of landings obligations for bycatch of quota species, there is a case that can 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.

We note the lack of any recent information about the amount of discards and that the view of these being at a low level is not supported by any available data.

It is essential that appropriate and sufficient scientific sampling along with sampling of fishing vessels is implemented and sustained in the long term to support future management decisions.

A much more integrated, ecosystem-based approach to herring management (Clyde and wider west coast) is required, that also addresses the protection and restoration of essential herring spawning, nursery and feeding grounds and ensures that these are incorporated within fisheries management plans and marine spatial management measures.

Data collection

About you

2 What is your name?

Name:
Lucy Kay

3 What is your email address?

Email:
email@arrancoast.com

4 Are you responding as an individual or an organisation?

Organisation

5 What is your organisation?

Organisation:
Community of Arran Seabed Trust (COAST)

6 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

7 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?

Yes

8 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

9 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: