



EU TAC and Quota Regulation for 2012: setting the level of TAC for Clyde herring.

(a) be consistent with the principles and rules of the CFP, in particular the principle of sustainable exploitation of the stock

(b) result:

(i) if analytical assessments are available, is the exploitation of the stock consistent with maximum yield from 2015 onwards, with as high as probability as possible

- There is uncertainty surrounding the herring stock structure and the state of the stock is uncertain
- Little idea at present of what MSY of the stock would be
- In 2011 a total of only 6 samples from one vessel operating in the Clyde. So very limited sampling
- It is unclear where the declared Clyde fish were caught
- It is unknown whether there is still resident spring spawning population
- Data is too sparse to conclude anything about stock size
- Marine Scotland stated that *“the value of the fishery is low, disproportionate resources would be required to conduct detailed assessments”*

(ii) if analytical assessments are unavailable or incomplete, is the exploitation of the stock consistent with the precautionary approach to fisheries management

- Clyde herring is a very data poor stock. Rolling over of the TAC of 720 tonnes as in the last two years is unsatisfactory especially since landings severely declined in 2011 to 80 tonnes.
- Insufficient research has been attempted to look at the relationship between the Clyde herring and the Western stock complex. Looking at the figures for the Clyde fishery, it has been of great historical importance. The late 1950s and early 1960 saw catches of spring and autumn spawners combined of up to 14,848 tonnes, and since then, except for 1969 there has been a steady decline to 80 tonnes in 2011. Figure 3 clearly shows the dramatic decline.
- Detailed assessment needs to be carried out, on spawning areas and the relationship of decline in young stock to mobile methods of inshore bottom trawling and dredging in the Clyde.
- Clearly the principle of sustainable exploitation of the stock is not being adhered to, whether due to overfishing of herring or destruction of spawning grounds and young stock by bottom trawling and dredging in nursery grounds.
- Scientific evidence is beyond any doubt that the Brown Head and Ballentrae Banks are known as important spawning grounds. Whilst the Ballentrae Banks received a short spring closure to bottom trawl and scallop dredge, Brown Head has never received any such closures. Our conclusions from reading of herring spawning habits are that the size and quality of the substrate is of the **utmost importance**. We think the Scottish Government would be in dereliction of its duties under the EC directive 2008/56/EC Marine Strategy Framework Directive if both these areas are not permanently closed all the year round to all mobile bottom towed gear.
- In view of this, the precautionary approach to the management of the herring fishery in the Clyde is essential. The TAC level must indicate the precarious nature of the fishery so a zero TAC for 2012 is appropriate. Further this should stay in place until research by Marine Scotland fulfils the obligation to properly assess the herring fishery in the Clyde, including the spawning grounds, and Spring and Autumn spawners.

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- The government can no longer continue to make important decisions on TACs only on the short term economics of a specific fishery. We are in no doubt that scallop dredging & bottom trawling of important known spawning areas has played a large part in the decline of Clyde herring. In these areas it is absolutely imperative that the precautionary principle should be used.

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