

Citizen Participation and Public Petitions Committee  
Wednesday 30 October 2024  
16th Meeting, 2024 (Session 6)

## PE2110: Protect wild wrasse stocks

### Introduction

**Petitioner** Charles Millar

**Petition summary** Calling on the Scottish Parliament to urge the Scottish Government to develop and introduce a statutory Fisheries Management Plan focussed on protecting wild wrasse stocks in Scottish waters, beginning with a data-collection exercise and introduction of precautionary fishery management measures ahead of the next fishing season commencing in May 2025.

**Webpage** <https://petitions.parliament.scot/petitions/PE2110>

1. This is a new petition that was lodged on 25 June 2024.
2. A full summary of this petition and its aims can be found at **Annexe A**.
3. A SPICe briefing has been prepared to inform the Committee's consideration of the petition and can be found at **Annexe B**.
4. Every petition can collect signatures while it remains under consideration. At the time of writing, 511 signatures have been received on this petition.
5. The Committee seeks views from the Scottish Government on all new petitions before they are formally considered.
6. The Committee has received submissions from the Scottish Government, the Petitioner, and the Cabinet Secretary for Rural Affairs, Land Reform and Islands, which are set out in **Annexe C** of this paper.
7. Members may wish to note that [the Rural Affairs and Islands Committee intends to take evidence in early November from the Cabinet Secretary for Rural Affairs, Land Reform and Islands](#) on amendments to the Joint Fisheries Statement, which includes issues related to the development of Fisheries Management Plans.

### Action

8. The Committee is invited to consider what action it wishes to take on this petition.

**Clerks to the Committee**  
**October 2024**

## **Annexe A: Summary of petition**

### **PE2110: Protect wild wrasse stocks**

#### **Petitioner**

Charles Millar

#### **Date Lodged**

25 June 2024

#### **Petition summary**

Calling on the Scottish Parliament to urge the Scottish Government to develop and introduce a statutory Fisheries Management Plan focused on protecting wild wrasse stocks in Scottish waters, beginning with a data-collection exercise and introduction of precautionary fishery management measures ahead of the next fishing season commencing in May 2025.

#### **Background information**

Wild-caught wrasse are used as cleaner fish to tackle lice in aquaculture facilities. They are caught in creels and landed or sold directly to salmon farms. Data is available for those landed, showing peaks and declines consistent with local extirpation.

Wrasse are associated with rocky reefs and other Priority Marine Features under the Habitats Directive Annex 1, creating a requirement to properly manage the wrasse fishery in or near these sites.

Wrasse are long-lived and territorial predators, with unusual reproductive patterns. This makes them vulnerable to over-catching, and opening a fishery for them without baseline data and a fisheries management plan is inappropriate and against the terms of the 2020 Fisheries Act. Local extirpations affect other wild fish species, both target and non-target. Action was promised to better protect wild wrasse beyond the limited 2021 measures, perhaps in line with better practice in English waters, but nothing has been forthcoming.

## Annexe B: SPICe briefing on petition PE2110



### Background

Wrasse are a family of fish species which feed upon crustacea and molluscs and play an important role in the wild in controlling parasites which predate upon other fish (including commercial species) or on habitat-forming flora such as kelp.

They are used as 'cleaner fish' in the Scottish finfish aquaculture industry to control parasitic sea lice which predate on farmed finfish, often to reduce or eliminate the need for anti-parasitic chemical treatments which can have adverse impacts on the marine environment.

The petitioner expresses concern regarding the vulnerability of wild wrasse stocks to over-catching due to their biological and reproductive characteristics. The petition calls for the introduction of a statutory Fisheries Management Plan focussed on protecting wild wrasse stocks in Scottish waters.

### Wild wrasse fisheries

Wrasse are largely wild caught in fisheries. [A 2021/22 report on the Scottish wild wrasse fishery](#) (published in July 2024) explains that the fishery for wrasse has developed since the late 1980's.

Total landings were 68.0 tonnes in 2021 and 78.6 tonnes in 2022. Ballan wrasse is typically the most common species of wrasse landed and accounted for 73.0% of the reported landings (by weight) in 2021 and 80.6% in 2022.

The wrasse fishery season runs from 1st May - 30th November each year. There is currently no Total Allowable Catch (TAC) applied to commercial wrasse fishing which means that there is no limit to the number of wrasse above a certain size limit (see section below on Scottish Government Action) which can be fished during the fishing season.

### Vulnerability of wrasse to over-exploitation

[A briefing on the petitioner's organisation's website](#) provides the following reasons why wild wrasse are vulnerable to over-exploitation which can cause localised depletion ('extirpation').

- Their limited home range can lead to localised extirpation because, when wrasse are removed from an area, other individuals do not readily recolonise it;

- Wrasse are long-lived and slow growing, so the removal of mature specimens can adversely affect the reproductive potential of localised populations;
- Wrasse have unusual reproductive biology, with the males of several species behaving territorially to protect their eggs. The loss of adult males from a population may therefore adversely impact on stock recruitment; and
- Some wrasse are hermaphroditic with smaller individuals starting life female but becoming male on reaching a larger size. As a result, fisheries which remove larger sized fish may pose a risk to the sex ratio, which presents a further risk to reproductive success.

## Scottish Government Action

In 2018 the Scottish Government and Salmon Scotland introduced voluntary management measures to the previously unregulated fishery. Following consultation in 2020, the measures were made mandatory in 2021 by introduction of a licence condition prohibiting all Scottish vessels from fishing for wrasse unless they successfully apply on an annual basis for a Letter of Derogation from Scottish Ministers.

Mandatory measures include:

- Restrictions on creel (fishing pots and traps) numbers and minimum and maximum landing sizes of caught fish.
- The requirement to submit weekly scientific data return forms to the Marine Directorate

[Further details on the mandatory measures are provided in the Scottish Government's wild wrasse fishery report \(see page 2\).](#)

## Scottish Parliament Action

[In November 2018, the Scottish Parliament Rural Economy and Connectivity Committee \(RECC\) published its inquiry report on salmon farming in Scotland.](#) The report included consideration of the use of cleaner fish in the salmon farming industry. The report concluded:

“The Committee acknowledges the benefits that cleaner fish may have for the salmon industry. However, it recognises that these benefits can only be achieved through careful management of the environmental implications and sustainable use of cleaner fish stocks.”

The report made the following recommendations:

- **RECOMMENDATION 26** It endorses the ECCLR [Environment, Climate Change and Land Reform Committee] recommendations on cleaner fish and agrees that there is an urgent need for an assessment of future demand as well as all associated environmental implications of the farming, fishing and use of cleaner fish.

- **RECOMMENDATION 27** The Committee welcomes the Scottish Government's commitment to "assess whether management measures are appropriate and proportionate to the current and anticipated future levels of sustainable wild wrasse fishing in Scotland" as part of its Fish Health Framework. It would urge the Scottish Government to complete this assessment as a matter of urgency.
- **RECOMMENDATION 28** The Committee strongly recommends that the Scottish Government consider the need for regulation of cleaner fish fishing to preserve wild stocks and avoid negative knock-on impact in local ecosystems.

[The Rural Affairs and Islands Committee are currently taking evidence to inform its follow-up inquiry to the RECC inquiry.](#)

There are numerous Parliamentary questions which have been lodged regarding the management of wrasse fisheries in recent years. These can be viewed in the link below:

[Parliamentary Questions - Wrasse](#)

**Damon Davies**

**Researcher, Environment, Constitution, Rural and International Relations,  
SPICe**

22/08/2024

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## Annexe C: Written submissions

### Scottish Government written submission, 22 July 2024

#### PE2110/A: Protect wild wrasse stocks

Wrasse are an important cleaner fish for many aquaculture companies in Scotland and the fishery for wrasse has developed since the late 1980s. In 2018 the Scottish Government and Salmon Scotland introduced voluntary management measures to the previously unregulated fishery. Following consultation in 2020, the measures were made mandatory in 2021 by introduction of a licence condition prohibiting all Scottish vessels from fishing for wrasse unless they successfully apply on an annual basis for a Letter of Derogation from Scottish Ministers.

The mandatory measures include restrictions on creel numbers and minimum and maximum landing sizes for each species of wrasse, as well as the use of otter exclusion devices. One of the mandatory measures is part of a data-collection exercise which requires fishers to submit weekly scientific data return forms (in addition to the statutory FISH1's and paper logs) to the Marine Directorate, reporting the number of wrasse landed by species for all pots deployed and more detailed information on the catches from the first 20 pots hauled for each fishing trip, including number of wrasse (by species) retained within the permitted landing size and the number returned to the sea, both within and outwith the permitted size range per ICES statistical rectangle. The report summarising the results from the data collected for 2021/22 fishing season is published online (<https://www.gov.scot/publications/wild-wrasse-fishery-2021-22-report/>) and the data collected over 2023 fishing season is currently being analysed.

The UK Fisheries Act and UK Joint Fisheries Statement contain a statutory commitment for the production of 43 Fisheries Management Plans (FMPs), of which the Scottish Government is the lead coordinating authority for 22. We are unable to confirm or commit to the production of additional FMPs beyond those currently in development, however, we will keep this under review and where appropriate and necessary will consider the need for additional FMPs in the future. We have also commissioned the Sea Fish Industry Authority to undertake some initial scoping work to help inform our approach to non-quota species (which includes Wrasse) FMPs in Scotland.

The Scottish Government keep the management measures introduced in 2021 under review and will introduce additional measures if the evidence suggests this is necessary. We continue to work with NatureScot, Scottish Ministers' independent statutory advisors, to ensure due process is being followed.

In addition to the data already being collected, the Scottish Government has recently consulted on inshore tracking and monitoring for the inshore fleet, which wrasse fishers are a part of. The consultation responses are currently being analysed and depending on the outcome, this could present a good opportunity to gather additional data from the fishery. We have also committed to consulting on a broad package of proposals to improve inshore fisheries management, informed by the Fisheries Management and Conservation (FMAC) Inshore sub-group, supporting our co-

management approach. Whilst these measures are not specifically directed towards the wrasse fishery we do envision them to have a positive impact.

## **Petitioner written submission, 7 August 2024**

### **PE2110/B: Protect wild wrasse stocks**

We write in response to the Scottish Government submission of 22 July 2024.

SIFT (Sustainable Inshore Fisheries Trust) welcomes that the wrasse fishery was eventually brought into the licencing regime in 2021. However, the mandatory measures that were introduced are insufficient to ensure the sustainability of the fishery: they are simply the inadequate [previous voluntary measures put on a statutory footing](#).

Restricting creel numbers per vessel, as the Government has done, does not restrict fishing effort if there are inadequate limits on the number of vessels. The Government has not imposed a limit on the number of vessels, instead, it essentially determines numbers by whether wrasse licence applicants have a contract to supply wrasse to salmon farms. So, **the quantity of wrasse trapped is largely determined by how many contracts the salmon farming industry chooses to issue**, rather than by the stock of wrasse. This falls short of an evidence-based Total Allowable Catch (the recognised way of limiting the exploitation of a wild fish stock).

SIFT welcomed the introduction of mandatory minimum and maximum landing sizes in the wrasse fishery. However, the size limits are unchanged from when the salmon farming industry oversaw the fishery. It is notable that Scottish size limits are lower than in other jurisdictions. For example, [the Cornish IFCA set a minimum size for Ballan wrasse of 16cm](#), compared to 12cm in Scotland. The Scottish Government recognised in its wrasse consultation that the Scottish size limits are lower than elsewhere, and that concerns were raised that larger Ballan wrasse survive better in the salmon cages but **has not provided evidence to explain its lower landing sizes**.

Temporal management measures are also inadequate: the Scottish fishery is closed until 1st May - **before** the Ballan wrasse spawning and nest-guarding seasons end. Furthermore, there is evidence that other wrasse species' breeding seasons continue even later into the summer. Whereas [several wrasse fisheries managed by the Cornish IFCA are closed to the end of June](#), and [Devon and Severn closed all wrasse fisheries until the end of July](#). **SIFT believes the Scottish fishing season is determined by the aquaculture industry which seeks wrasse in May and June when sea lice in salmon farms are problematic**.

SIFT welcomes the belated introduction of mandatory data collection into the wrasse fishery. However, this data only raises our concern about the fishery's sustainability.

The data only provides partial information on wrasse landings. However, using total tonnages and the average weight of individual wrasse landed in 2021 and 2022, we estimate that **over 3.5 million wrasse were landed from 2017 to 2022**. Given their longevity, territoriality, breeding patterns and important ecosystem functions, this is extremely concerning. Furthermore, managing a fishery that removes millions of fish

without knowledge of stock size **is inconsistent with the Scottish Government's obligation to meet the following UK Fisheries Act 2020 Objectives:**

- Sustainability: fish and aquaculture activities are environmentally sustainable [and] do not overexploit marine stocks;
- Precautionary: exploitation of marine stocks restores and maintains populations of harvested species above biomass levels capable of producing maximum sustainable yield;
- Ecosystem: fish and aquaculture activities are managed ... so as to ensure that their negative impacts on marine ecosystems are minimised;
- Scientific evidence: the management of fish and aquaculture activities is based on the best available scientific advice.

SIFT believes the Government's monitoring and analysis is insufficient to allow it to make any assertions about the fishery's sustainability. Additionally, it is vital to note that the relatively stable levels of wrasse being landed over recent years could be misinterpreted as indicating the fishery is sustainable: **stable landings are not an indicator of a sustainability** - catches can remain high while fish abundance declines. The Government cannot rely on the metrics it currently uses to show that the wrasse fishery is sustainable.

**The Government's failure to produce a Scottish Wrasse Fishery Management Plan (FMP) contrasts poorly with [DEFRA's forthcoming Wrasse FMP for English waters, which is being produced because of the "fishing industry and other key marine stakeholders ... concern relating to potential ecosystem impacts"](#)**. Given the 'potential ecosystem impacts' are analogous in Scottish waters, the Government's failure to commit to produce a Scottish Wrasse FMP raises further questions about its willingness to sustainably manage the fishery.

In addition to the Government's duties to manage wrasse for fisheries purposes, it has duties to manage wrasse because they form an integral part of protected Special Area of Conservation features. These duties stem from a requirement on regulatory authorities to achieve and maintain Favourable Conservation Status of Features listed in Annex 1 of the Habitats Directive, including "reefs". As part of this duty, the "typical species" of the protected features must be identified. A report commissioned - and accepted in March 2020 - by NatureScot but unpublished (albeit available following a FoI request) concluded that wrasse species should be considered typical species of reefs. Nature Scot's own Conservation Advice for the reef features of the Firth of Lorn SAC concurred with this.

Under the Conservation of Habitats and Species Regulations 2017, the relevant authority has a duty to assess the condition of Features, as informed by the status of their Typical Species every six years. This would include taking measures to restore wrasse populations where they have been depleted. These steps have not been taken.

SIFT is unconvinced by the Government's assertion that it "will introduce additional measures if the evidence suggests this is necessary". [The latest wrasse report](#)

[illustrates that the Government does not gather sufficient evidence to enable effective decisions on management measures](#). We question what evidence, metrics and threshold values the Scottish Government will use to determine additional management measures.

SIFT also notes the Government's non-committal comments regarding inshore vessel tracking. SIFT is a member of the FMAC Inshore sub-group and has repeatedly sought assurance from the Government that the consultation "on a broad package of proposals" will include wrasse management. Given the nonspecific responses to our questions, we are unconvinced there will be any improvements to the wrasse fishery in the foreseeable future.

## **Cabinet Secretary for Rural Affairs, Land Reform and Islands written submission, 24 October 2024**

### **PE2110/C: Protect wild wrasse stocks**

I am writing to provide you with an update to the wrasse fishery with regards to Parliamentary Petition PE2110.

In addition to the measures outlined in the Scottish Government written submission of 22 July, I would like to inform you we are now in receipt of a report titled "Assessing the implications of wrasse fishing for marine sites and features", which brings new evidence of potential wrasse fishing interactions with Special Areas of Conservation (SAC)'s and Marine Protected Area (MPA)'s. In light of this evidence, we now intend to undertake an appropriate assessment, under the Habitats Regulations, for the wrasse fishery ahead of the next season opening in May 2025.

As you're aware, no appropriate assessments have been carried out previously as wrasse are not specifically included as protected features in any of Scotland's Special Areas of Conservation and there was no evidence that showed wrasse fishing have a significant impact on rocky reefs.

In addition to the wrasse specific fisheries assessment noted above, as part of implementing fisheries management measures for the inshore region, fisheries assessments are being undertaken for all the Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and the Nature Conservation Marine Protected Areas (NCMPAs) where these measures are required in line with Management Advice (CMA) provided by NatureScot. Whilst wrasse is not a protected feature of any designated sites, these assessments will highlight if fisheries management measures are appropriate and that the measures put in place ensure that fishing activities do not negatively impact the conservation objectives and protected features of designated sites.

I hope this information is helpful.

Yours sincerely,

**MAIRI GOUGEON**