



Written evidence submitted by the Sustainable Fish Cities campaign, part of the organisation Sustain: The Alliance for Better Food and Farming (FISH10)

Executive Summary

Sustainable Fish Cities is part of a movement that is making the market for sustainable fish grow ten times faster than for conventional fish. The basis of our concern regarding the Fisheries Bill is that the proposals fail to allow UK fisheries to capitalise on these growing markets, in fact they may mean that some UK fish continues to be 'blocked' from some menus because it isn't considered sustainable.

We provide evidence that the best way to gain the best markets for UK fish, as well as rebuild fishing communities and increase jobs and catches is to change the Fisheries Bill to make the sustainability, transparency and data collection elements stronger, specifically:

- **A set of duties upon public authorities**, to ensure commitments to sustainable fishing are truly world-leading and give certainty
- **Quota reallocation**: Identify a set of criteria that define environmentally and socially responsible fishing, then switch a meaningful portion of the UK quota to the new system over time. This would make the system fairer, better for jobs and coastal economies, and make sustainability initiatives more successful
- **Publish an annual statement** on the biological, environmental and economic status of all commercial fisheries in the UK, to help communicate the UK's sustainable fisheries and identify areas for improvement
- **Data deficiency**: Ensure all commercially-fished species in the UK have the necessary data to establish sustainable catch limits, through more stock assessments, fully recorded catches, and Vessel Monitoring System (VMS) on all vessels, including CCTV. This will ensure fisheries don't miss out on being considered sustainable through lack of data.
- **By 2020, set fishing mortality at scientifically recommended sustainable levels**, to help long term increase in catches by 45%, create 2,400 full time jobs, meet our international commitments, as well as boosting coastal wildlife tourism.

Introduction - What is Sustainable Fish Cities?

1. *About Sustain: The Alliance for Better Food and Farming*

Sustain advocates food and agriculture policies and practices that enhance the health and welfare of people and animals, improve the working and living environment, enrich society and culture and promote equity. We represent around 100 national public interest organisations working at international, national, regional and local level. Sustain coordinates a number of other food and farming initiatives, see <https://www.sustainweb.org/projectsandcampaigns/>.

2. [Sustainable Fish Cities](#) is a national project run by Sustain, working to transform the market for sustainable fish in the UK foodservice (out of home) sector. Our ambition is that only verifiably sustainable fish is on UK menus.
3. Through our project, fish-serving businesses are invited to commit to an achievable but ambitious pledge to adopt a fully sustainable fish buying policy. The standards that businesses sign up to reflect the recommendations of the Sustainable Fish Cities working party, which is made up of the main marine organisations in the UK (see

Relevant sections of the Bill:
Section 1 pages 1-2

https://www.sustainweb.org/sustainablefishcity/about/#working_group). The standards have also been adopted by UK Government for public sector procurement. They ask businesses to:

- **Remove fish which is considered ‘Fish to Avoid’** by the Marine Conservation Society (MCS) (Red-rated, indicating significant environmental impact or depleted status – more info on page 4 below)
 - **Promote fish which is considered ‘Fish to Eat’ by the MCS or verifiably sustainable** according to a credible, independent certification scheme including the Marine Stewardship Council (for wild-caught fish), or the Aquaculture Stewardship Council, Organic, GlobalGAP, RSPCA Assured or BAP for farmed fish (for farmed fish).
 - **Improve the sources of fish considered ‘OK to eat occasionally’** (amber-rated) by the MCS, and take steps to serve less well-loved and underutilized fish from the UK coast.
4. To date, businesses serving [well over 0.8 billion meals per year](#) have committed to buying fish according to these standards, including:
 - All central government procurement, Whitehall, prisons and defence catering, and the NHS in England and Wales.
 - Eight of the ten largest contract catering companies in the UK for thousands of workplaces, stadia, schools and conference and leisure venues
 - Brakes - the largest foodservice wholesaler with roughly 20% market share have switched all their own-brand fish products to demonstrably sustainable options.
 - 30+ UK Universities, covering about 25% of all the students in UK
 5. These business commitments are creating a significant and growing market for sustainable fish in the UK. Unfortunately, at the moment a large amount of the fish landed in the UK *isn't* caught sustainably (see Table 2), doesn't meet the criteria above, and is therefore not able to be served. In fact we have evidence that [UK fisheries are missing out on markets worth £62 million](#) from the contract catering sector alone as business import fish to fulfil their sustainability policies, rather than buying locally. Tragically, much of the fish caught in the UK doesn't meet high enough standards of sustainability to be served in our own prisons, hospitals and Whitehall departments, or on the menus in many workplaces, pub chains and restaurants.

We therefore recommend a number of revisions to this Bill, and provide evidence for each recommendation separately:

6. **DUTIES, NOT JUST OBJECTIVES:** The first issue is that the clauses around **sustainable fishing aren't legally-binding**. The bill sets out a number of *objectives* for future policy, including sustainability, an ecosystem approach, scientific objective and discards objective (page 1). However, without a *duty* for public authorities to act, the objectives are

unenforceable. There is a risk that medium-term sustainability objectives will be sacrificed under political pressure to allow overfishing in the short term. Evidence to support a change:

Relevant sections of the Bill:
Section 20 Distribution of fishing opportunities (*page 11*)

7. **A) Marine Stewardship Council certificates are at risk if sustainability commitments are uncertain or unenforceable.** The UK has a number of [Marine Stewardship Council certified fisheries](#), including:
- a. North East Atlantic Mackerel
 - b. Cornish Hake
 - c. Cornish Sardine
 - d. North Sea Plaice and sole
 - e. Irish Sea Herring
 - f. North Sea Herring
 - g. North Sea Cod
 - h. Rockall Haddock
 - i. North Scottish Whiting, Hake, Plaice and Saithe
 - j. North Sea Saithe
8. These fisheries can use the blue ecolabel on products as an assurance of sustainability, a valuable marketing boost and an opportunity to secure access to some of the best markets in the UK and abroad (including those listed in paragraph xxx above). The MSC certification criteria includes a requirement that sustainable fishing objectives must be ‘clear, explicit and required by’ the relevant management authorities (PI 3.1.3). North Sea cod has become an iconic example of how stocks can be rebuilt through good management and reap the benefits of being recognised as sustainable, having achieved MSC certification in 2017. Its [certification report](#) explicitly cites the benefits of the EU Cod recovery plan as [emphasis added] ‘important because laying down the Total Allowable Catch rule *in a regulation* prevented managers from setting values driven by short-term political expediency’.
9. Moving away from explicit, enforceable targets could jeopardise sustainability certifications and affect UK boats’ market for goods.

10. Recommendations: Change the Bill (or add a clause) to outline a set of *duties* upon public authorities. A new section; ‘duties’ would fit just after ‘Objectives’ on page 2.

These should include, but not be limited to:

- A duty to set Total Allowable Catches (TACs) for the UK at Maximum Sustainable Yield by 2020
- Respect the TACs agreed through multilateral agreement with the EU and other states
- Fully implement the ban on discarding fish
- Ensure all fisheries management is designed according to the ecosystem approach

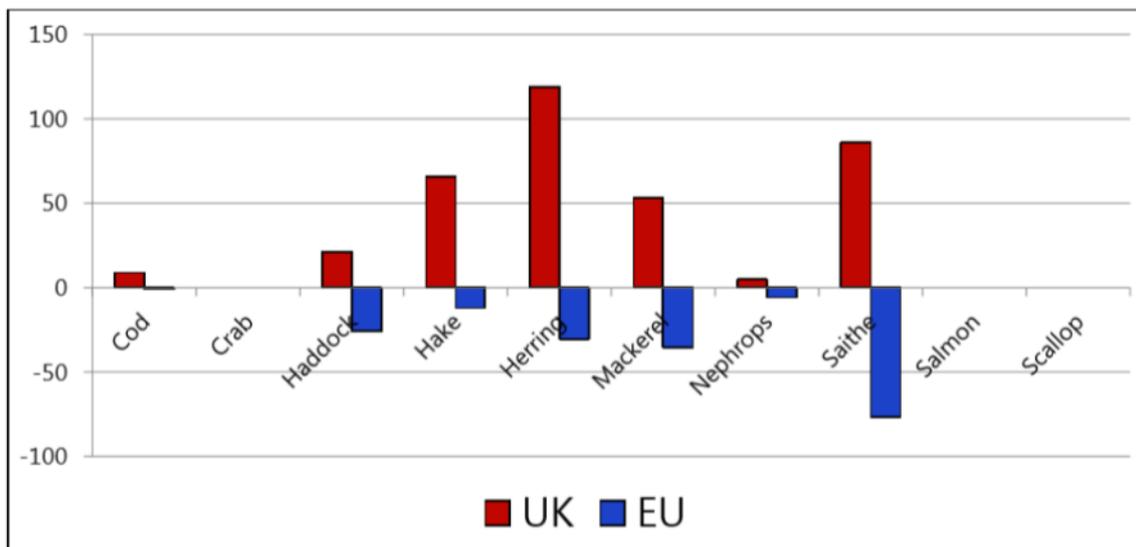
11. **REDESIGN THE SYSTEM FOR ALLOCATION OF UK FISHING QUOTA** (not just any that may be ‘won’ through negotiations). A new system of allocating quota would help to achieve a number of the aims of the Bill. Not doing so would – we believe – make it difficult to create the incentive and reward system necessary for the Bill to be implemented successfully, and require costly enforcement measures such as on-board observers or patrol vessels.

12. *Table 1 – how a new system of quota allocation would help to achieve the aims of the Fisheries Bill*

The stated objectives of the Fisheries Bill, (see schedule 1 page 1)	How quota reallocation helps to meet these aims	Risks if the allocation system stays as it is now
<p>(a) the sustainability objective</p> <p>(b) the precautionary objective</p> <p>(c) the ecosystem objective</p>	<p>Extra quota could be allocated to recognise and reward sustainable fishing practices, for example:</p> <ul style="list-style-type: none"> -Avoiding bycatch with high-tech fishing net technology such as SafetyNet -Avoiding protected areas (there is growing evidence of illegal fishing in protected areas) 	<p>There is a risk of a lack of incentive to switch to sustainable fishing and thus fulfil the sustainability objective and ecosystem objective.</p> <p>If not a revised quota system, a new form of incentive or regulation will be required. This could be:</p> <ul style="list-style-type: none"> -Funding changes directly (at the moment the European Maritime and Fisheries Fund fulfils this role to some extent) -Strengthening the enforcement regime for example boosting the patrol fleet – which is likely to be much more costly for government.
(d) the scientific evidence objective	<p>Extra quota could be awarded to boats for taking part in scientific data collection activities, including:</p> <ul style="list-style-type: none"> -Installing Vessel Monitoring Systems including CCTV, complying with regulations around vessel monitoring and keeping the system in good repair and switched on. -Fully recording catches 	<p>There is a risk that data collection will be seen as a burden for fishers and implementation and compliance is likely to be slower, and/or lower without a genuine incentive to implement.</p>
(e) the discards objective	<p>Quota could be allocated more flexibly to help prevent boats being ‘grounded’ due to the discard ban. For example at the moment, in mixed fisheries, the quota for one species can be exhausted quickly meaning boats can’t fish at all. A fairer allocation system could see such boats getting a greater share of the quota, having access to a quota ‘pool’ or sharing between boats, as long as these boats are fishing sustainably.</p>	<p>It is very difficult to see how the discard ban will be implemented in January 2019, as per the legislation carried over from the EU in the Withdrawal Bill, without some flexibility in quota allocation.</p>
Achieving economic, social and employment benefits (see p1)	<p>Small scale fleets across the north Atlantic employ five times as many people per tonne of fish caught than large scale vessels.</p> <p>Over 99% of fish caught by under 10 metre boats is landed into UK ports. Giving a greater share to smaller-scale fleets would bring more of the associated transport, processing and storage activity to coastal UK communities</p>	

13. Just reallocating the quota that is ‘won’ from Brexit *won’t satisfy the aims of this Bill* because the species for which the UK may receive an increased share are not those normally targeted by the small scale or inshore fleet:

Figure 1: Assumed % change in quotas, based on a study by the University of Aberdeen and the Scottish Fisherman’s Federation, for areas IV and VI.



14. Recommendations: The Bill should commit to identifying a set of criteria to define environmentally and socially responsible fishing, which should include social benefits (jobs and connection to UK coastal communities) and environmental sustainability. Then, the UK should switch a meaningful portion of the UK TAC over to the new system over time, encouraging community quota-sharing schemes and greater control for fishing communities.

This text could be added to section 20, (page 11), which already discusses powers to allocate UK quota between boats.

15. **GATHER BETTER DATA:** Improving our fisheries data would allow management policies like closed areas to be more precise and effective, improve how the UK can market our fish as sustainable, and ensure that the UK is a leader in the development and use of on-board technology and scientific equipment. In this evidence, we focus on the business benefits of improving fisheries data:

16. At present some UK fisheries – from smaller fleets in particular - are missing out on being able to market their fish as sustainable because there isn't enough data to prove sustainability. Only 12% of the stocks targeted by the inshore fleet in England have the data necessary to achieve sustainability certification, the rest were determined ineligible in a [2013 study](#). By comparison, for the large stocks targeted by larger boats, [80% have a stock assessment](#) – 80% is still not enough, but significantly more than for stocks targeted by the small scale fleet.

Relevant sections of the Bill:
Section 1 'Objectives' (page 2)

Section 28 *Grants and Charges*
(Page 16)

Section 31 *Powers to make further provision* (page 18)

17. How data-deficient fleets are missing out: *The Marine Conservation Society's 'Good Fish Guide' rating scheme*

The [Good Fish Guide](#) is the UK's most widely used and respected seafood sustainability rating scheme, and Sustainable Fish Cities (along with all the businesses that have signed up to our pledge) use these ratings to define whether a fish is sustainable. It is science-led and consultative, and rates fish on a scale of 1-5 (1 being considered 'best choice', 5 being 'fish to avoid').

The [rating methodology](#) considers the health of the target stock, impact of fishing on the marine environment, and the effectiveness of management. Where this data isn't available a precautionary approach is used, which must assume the worst to ensure unsustainable fish isn't inadvertently promoted.

18. At present, a worrying amount of the UK's catch is rated 4-5 and therefore avoided by fish cities' pledge signatories (including public sector institutions). In Table 1, we illustrate how big a factor data deficiency is for some of the UK's most important commercial fish species.

Table 1 – Summary of data deficiency issues for the 11 most commercially-important fish species caught by UK boats

Species and landings value in 2016	Marine Conservation Society rating for UK-landed stocks	Sustainability challenges related to data deficiency
Mackerel £188 million		The information and management of mackerel is good and most of the UK catch has Marine Stewardship Council certification
Nephrops (Scampi) £104 million	 Scampi caught in parts of North Sea is red-rated	Stock status in some areas is unknown. Not all boats are monitored and catches recorded, so it isn't possible to determine the extent of overfishing or what needs to be done to prevent it in the North Sea and eastern Scotland areas.
Scallops £75 million	 Scallops from Isle of Man & dredged from Scottish inshore areas are red-rated	Stock status is unknown across most of the UK, and without this data, it isn't possible to tell if stocks are overfished or set effective catch limits.
Monkfish or Anglerfish £60 million		Data deficiency for south west Monkfish stocks, others stocks are better understood
Herring £56 million	 Herring caught in west of Scotland & West of Ireland are red-rated	Stock data for herring is generally good throughout the UK. In some areas though (Celtic Sea, Irish Sea, Western Baltic, West of Scotland and West of Ireland) fishing pressure exceeds scientific advice and the stocks are depleted, and consequently these areas are considered 'Fish to Avoid'
Cod £53 million	 Cod caught in the Celtic Sea, areas of the English channel, west of Scotland and Cornwall is red-rated.	In most areas cod populations are well understood and this has led to very positive stock recovery in some areas. The low sustainability ratings for some stocks are a result of long term overfishing

Crabs £53 million		Velvet and spider crab stocks poorly understood throughout the UK so it isn't possible to be sure at what level fishing becomes unsustainable
Haddock £45 million		In most areas haddock populations are well understood and the sustainable fisheries in Scotland have been awarded Marine Stewardship Council certification. The low sustainability ratings for some stocks are a result of overfishing
Lobsters £40 million		Data deficiency is a serious problem for UK lobster fishing. In some cases, there isn't sufficient data on landings to be sure that overfishing isn't happening,
Hake £33 million		Following stock decline in the 1980s, a recovery plan was introduced based on scientific advice from ICES (The International Council on the Exploration of the Sea). The data has informed management ever since, and all stocks now considered sustainable
Plaice £28 million	 Plaice caught in west and SW Ireland, and pulse-trawled fish in North Sea is red-rated	Data deficiency is a serious problem for this species – there is missing data on abundance, exploitation & discards for the West of Ireland area, northern Ireland, Bristol Channel, and Baltic Sea. As such, many sources aren't considered sustainable.

19. Solving the problem:

In a report to be published imminently, we have calculated that based on similar costs in the USA, full assessments for the data deficient fisheries targeted by the English inshore fleet and the main UK commercial species would cost around £140 million¹. To maintain and update these assessments would cost around £19 million² annually, based on similar stock assessments for the EU. This is moderate a fraction of the €243.1m that has been spent on fisheries between 2014 and 2020 by the EMFF (European Fisheries and Maritime Fund).

20. The business benefits of better data

- The market for sustainable fish growing [ten times faster than for conventional fish](#). In a [recent report](#), we found that the UK fisheries that aren't verifiably sustainable are losing out on millions of pounds of business because companies are looking abroad for fish that meets their sustainable buying policies. The small-scale fleet in particular are therefore having their current and future market opportunities narrowed because lack of data is meaning a lower Marine Conservation Rating than perhaps they deserve.

¹ In the USA, NOAA carry out stock assessments for, costing \$215million for about 121 assessments,\$1.7million per assessment Initial cost is high but to update and maintain assessment much less expensive https://www.npfmc.org/wp-content/PDFdocuments/CM/2016/102016/NOAA_FisheriesCostofStockAssessments.pdf

² In the EU, ICES carry out assessments on 194 stocks with a budget for this work of around £32.7 million, so £168k per stock. To assess 113 stocks is therefore estimated to be around £19million

21. Recommendations: Set a target to end data deficiency by 2025:

- Analyse where data deficiency exists (this was done in 2012 for the English inshore fleet as part of [Project Inshore](#) – meaning that much of this work has been done)

- Provide the resources and incentives to fill the data gaps – in many cases this will involve fully recording catches, CCTV coverage, and in some cases carrying out stock assessments.

For the Bill, the following three changes will give the necessary statutory power:

1. In a new section; ‘duties’ – (this would fit just after ‘Objectives’ on page 2).

The Scientific Duty:

Fisheries policy authorities must:

- Base all fisheries management decisions on the best available scientific advice
- Ensure that there is sufficient scientific data to accurately determine the levels of exploitation that will produce maximum sustainable yield for all harvested species, as per schedule 1, paragraph (3) (b)

2. Amend *Grants and Charges* section (Page 16) – insert after line 25

28: Financial assistance: powers of Secretary of State

The Secretary of State may give financial assistance, or arrange for financial assistance to be given, to any person for any of the following purposes—

(aa) the gathering of scientific data relating to fishing, including but not limited to carrying out stock assessments, vessel monitoring and recording fishing catches.

3. Amend *Powers to make further provision* (page 18) – insert after line 24

31: Power to make provision about fisheries, aquaculture etc

(2) “A conservation purpose” means any of the following—

(d) The gathering of scientific data to inform management of fish stocks

22. TRANSPARENT REPORTING: Despite [proposals in the White Paper](#) to release an ‘annual statement’ on the sustainability status of UK stocks, this has been missed out of the Bill. Better reporting would benefit the fishing industry and sustainability – as per the aims of this Bill:

- a. A public statement would help fish buyers to make sustainable choices, give confidence to businesses when considering buying UK fish, and improve our ability to market our as sustainable, here and abroad.
- b. Publicly-available data is a basic tenet of a world-leading fisheries management regime. Australia – considered a world-leader on many aspects of fishing management - publishes [such a statement](#) on their website.
- c. The Government has promised to create ‘[a gold standard for sustainable fishing](#)’. Without transparent information, we can’t evaluate the success or failure of this promise, or hold this and future governments to account.

Relevant sections of the Bill:

None yet – proposal to add new text in section 8

23. Recommendations: I believe this could be addressed simply by adding the following text within the first section *Fisheries objectives and fisheries statements*

7 Annual Statement

The Secretary of State will publish an annual statement on the status of fish stocks in the UK. The statement shall-

- Provide an independent evaluation of the biological, environmental and economic status of all commercial fisheries in the UK
- Contain information on UK fisheries according to the objectives of the fishing Bill, ie -
 - (a) the sustainability objective
 - (b) the precautionary objective
 - (c) the ecosystem objective
 - (d) the scientific evidence objective
 - (e) the discards objective, and
 - (f) the equal access objective.
- Be available to the public and published on the Defra website

24. IMPROVE SUSTAINABILITY TARGETS TO MEET INTERNATIONAL

OBLIGATIONS AND REBUILD THE FISHING INDUSTRY: Fishing quotas must be set at a level which will produce Maximum Sustainable Yield (MSY) by 2020. The Bill does not contain a target date to achieve this level of fishing effort. We provide the following evidence to explain why it is crucial to change this:

25. Firstly, the Government have promised to use the opportunity offered by Brexit to rebuild the UK fishing industry. Nearly half of the key UK industrial stocks have been overfished beyond their economic optimum so could support higher catches if they were allowed to recover. Doing so requires setting catch limits at levels which will lead to Maximum Sustainable Yield (MSY). Our fisheries could yield 45% higher landings, an additional Gross Value Added of approximately £150 million and an additional 2,400 full-time equivalent (FTE) jobs, if all stocks reached MSY. Any delay is reducing the potential earnings of the fishing industry.
26. Secondly, through the European Union, the UK is signed up to a commitment to fishing at MSY (FMSY) by 2020. Removing a time-bound target (and essentially allowing stocks to be overfished for longer), represents a weakening of environmental policy. The Government have repeatedly stated that their 'green' Brexit will not result in a lowering of environmental standards.
27. The UN Sustainable Development Goals were agreed by world leaders in 2015. Goal 14 explicitly requires states to; 'By 2020, effectively regulate harvesting and end overfishing...to restore fish stocks in the shortest time feasible, at least to levels that can produce maximum sustainable yield' This proposal therefore threatens the UK's progress towards these goals.

Relevant sections of the Bill:
Section 1 pages 1-2

Tourism and other cultural benefits for better protecting the marine environment:

28. Small-scale fishing industries and tourism are unique assets that have been identified as key opportunities to help to reverse deprivation and rising unemployment in coastal communities. Accessible, wildlife-rich seafronts, and healthy marine environments have been key to increasing tourism in coastal areas such as the Moray Firth, where visitors who

make their trip primarily to view wildlife at the coast or in the marine environment spend [£163 million per year](#).

29. The UK has enjoyed an increase in sightings of whales and dolphins in recent years, [linked with an overall increase in their global population](#). A new [Whale Trail](#) is proposed in Scotland, and the [Wildlife Trust proposes](#) that with better marine protection, numbers could increase. Across the world, communities appreciate the inherent value of an artisanal fishing heritage – in Iceland, [Dalvik's Great Fish Day](#) attracts thousands of visitors to appreciate the fishing culture. Hastings' recently-regenerated fishing quarter (through EU EMFF funding in two rounds worth nearly £2 million) includes a gallery, café, 'classroom on the coast' and community kitchen, and hosts [two seafood festivals](#) annually – including [one to celebrate locally-caught herring](#). As a result of boosting the identity of the fishing fleet, restaurants, hotels and retailers are [more likely to source locally and employ local people](#).

30. Recommendations: Simply change Section 1; Fisheries objectives, to add a date, as follows (see page 2)

(3) The "precautionary objective" is—

(a) to apply the precautionary approach to fisheries management, and

(b) to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above biomass levels capable of producing maximum sustainable yield. By 2020, fishing mortality to be set at scientifically recommended sustainable levels.

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