PE2110/G: Protect wild wrasse stocks

Petitioner written submission, 27 June 2025

I refer to the open Petition, PE2110, calling for a Fisheries Management Plan for the wrasse fishery in Scotland's waters, and draw your attention to <u>the Scottish</u> <u>Government's Wrasse Fisheries Assessment</u> provided by Ministers to the Rural Affairs and Islands Committee on 6th June 2025.

I also refer to my initial response to this Assessment, which I sent to the RAI Committee Convener on 19th June 2025, which notes and welcomes the fact that the wrasse fishery is now closed in Special Areas of Conservation and some Nature Conservation Marine Protected Areas.

However, and with regard to Petition PE2110, it is important to note that the proposals in the Wrasse Fisheries Assessment do not represent a Fisheries Management Plan for the wrasse fishery. There is, inter alia, still no Total Allowable Catch, no stock assessment, and nothing relating to managing the fishery outwith Special Areas of Conservation (SACs) or Marine Protected Areas (MPAs).

In addition, I share with other stakeholders very substantial concerns about the evidence base that Marine Directorate has used to define the Scottish wrasse spawning season (and hence when the fishing season should be open). Specifically, the data used by Marine Directorate is sourced from <u>a 2025 study</u>, by the Centre for <u>Environment Fisheries and Aquaculture Science</u> (CEFAS), which focuses on the south coast of England. Analyses of the CEFAS dataset have shown that the relationship between month and GSI (gonadosomatic index an index for fish spawning) had **no statistical significance**. It is therefore alarming that the Wrasse Fisheries Assessment is using this dataset as evidence for seasonal trends in spawning. The analyses did however show that the length of the wrasse has a significant impact on GSI. This is important because many of the wrasse sampled as part of this study, particularly in the summer, were small and immature, and consequently had low GSI values because of their immaturity rather than the time of year they were sampled.

Additionally, while ballan wrasse make up the majority of landings in Scotland, the Wrasse Fisheries Assessment failed to consider any evidence for the spawning seasons of the four other species of wrasse (cuckoo, corkwing, goldsinny and rock cook) – which together make up 25% of landings.

While the RAI Committee has considered elements of the fishery through their aquaculture work, the specific question of a Fisheries Management Plan has yet to be considered – such an exercise would of course remain my hope – not least because such an FMP would cover the whole fishery, not just how it operates within MPAs and SACs.