CPPP/S6/25/13/5

Citizen Participation and Public Petitions Committee
Wednesday 10 September 2025
13th Meeting, 2025 (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. The Committee last considered this petition at its meeting on 30 October 2024. At that meeting, the Committee agreed to write to the Scottish Government.

2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.

3. The Committee has received new written submissions from the Scottish Government and the petitioner, which are set out in **Annexe C**.

4. Written submissions received prior to the Committee's last consideration can be found on the petition's webpage.

5. Further background information about this petition can be found in the SPICe briefing for this petition.

6. The Scottish Government gave its initial response to the petition on 22 July 2024.

7. Every petition collects signatures while it remains under consideration. At the time of writing, 553 signatures have been received on this petition.

Action

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

Clerks to the Committee
September 2025

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 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.

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: Extract from Official Report of last consideration of PE2110 on 30 October 2024

The Convener: The first new petition is PE2110, which was lodged by Charles Millar. It calls on the Scottish Parliament to urge the Scottish Government to develop and introduce a statutory fisheries management plan that is 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, which commences in May 2025.

The petitioner tells us that wrasse are used as a cleaner fish to tackle lice in aquaculture facilities, and that their unusual reproductive patterns make them vulnerable to overcatching. The SPICe briefing notes that there

“is currently no Total Allowable Catch ... applied to commercial wrasse fishing”.

That means that

“there is no limit to the number of wrasse above a certain size limit ... which can be fished during the fishing season”,

which runs between 1 May and 30 November each year.

In its response to the petition, the Scottish Government highlights the mandatory management measures that were introduced in 2021. Those require Scottish vessels to successfully apply, on an annual basis, for a letter of derogation from the Scottish ministers in order to fish for wrasse. The response also refers to the UK joint fisheries statement, which contains

“a statutory commitment for the production of 43 Fisheries Management Plans”.

The Scottish Government indicates that it is

“unable to confirm or commit to the production of additional”

fisheries management plans

“beyond those that are currently in development”.

We have also received a submission from the petitioner expressing concern that

“the mandatory measures ... are insufficient to ensure the sustainability of”

the wrasse fishery. The submission also highlights the development of a wrasse fisheries management plan for England.

Ahead of today’s meeting, we have received an update from the Cabinet Secretary for Rural Affairs, Land Reform and Islands indicating that the Government will be undertaking “an appropriate assessment” of wrasse fishing interactions, along with assessments of special areas of conservation and marine protected areas, ahead of the next fishing season opening in May 2025.

The cabinet secretary’s update prompted a late submission from the petitioner, which has been circulated to members. It raises concerns that the Scottish

Government received a report that was mentioned in the cabinet secretary's submission in 2020, but has failed to act on it until now.

Members will also have noted that the Rural Affairs and Islands Committee is exploring issues relating to wrasse fishing as part of its consideration of amendments to the joint fisheries statement and its follow-up inquiry on the salmon farming industry.

Therefore, the Government will—however belatedly—do something in respect of the monitoring of all this. I wonder whether colleagues feel that that leads us in a particular direction.

David Torrance: I am going to surprise you, convener. I want to keep the petition open, so that I can get information from the Scottish Government on what consideration it has given to the total allowable catch limits on commercial wrasse fishing and what discussions it has had with the UK Government on the development of its wrasse complex fisheries management plan. Specifically, I want to know what consideration has been given to developing similar measures in Scottish waters.

The Convener: In an unexpected further burst of interventionist action, Mr Torrance has come forward with a proposal that we keep the petition open and try to track down a bit more detail. Are colleagues content that we do so?

Members *indicated agreement.*

The Convener: We will keep the petition open and pursue it on that basis.

Annexe C: Written submissions

Scottish Government written submission, 4 December 2024

PE2110/E: Protect wild wrasse stocks

I am writing in response to the two questions asked in your letter of 8 November with regards to Parliamentary Petition PE2110: Protect wild wrasse stocks.

What considerations has the Scottish Government given to applying Total Allowable Catch limits to commercial wrasse fishing?

The Scottish Government has no current plans to introduce a Total Allowable Catch (TAC) limit for each of the five constituent species of wrasse. However, the Scottish Government is co-funding a PhD research studentship investigating appropriate principles of possible catch rules for wrasse species. This PhD work has been submitted for publication.

There are inherent challenges in developing a biological TAC (Total Allowable Catch) based on quantitative stock assessments for each wrasse stock that takes account of the sustainability of that stock. We are not aware of any measures currently in place in the UK, EU or further afield. These difficulties arise because wrasse are landed live for use as cleaner fish in salmon farms, and are indeed the only fin fish in Scotland that are landed live in this way. The data required to undertake a stock assessment to inform the setting of a biological TAC limit would require handling and measuring live fish, and unlike traditional consumption fisheries it is not possible to extract biological material for establishing age-length estimates critical for undertaking stock assessments.

There are further practical difficulties in gathering information about the wrasse fishery, due to the characteristics of the fleet and onboard operations. The captured fish do not go to traditional consumption fisheries market, removing the possibility of high volume sampling of landings at markets. Gathering biological data would mean extended handling of live fish, potentially causing damage and distress to the fish, and resulting in less marketable fish or increased fatalities. Alternatively, the required data may be obtained from sampling of landed (deceased) fish from fisheries independent surveys to obtain biological parameters. However, any new work in this area would need to be considered alongside other priorities.

Considerations have been made for sampling wrasse after they have been used in salmon farms. However, this would not be suitable because the fish would have been maintained in artificial conditions having been fed, sheltered from predation and medicated, and so would not be indicative of the wild populations.

Catch limits are applied in Norway, based on landings in preceding years prior to the limits were introduced. These limits are carried forward and have remained the same since being introduced in 2017. The issue with this approach is it is static (based on a fixed point in time) and is therefore not a valid measure of sustainability. It assumes constant productivity over time, and does not account for fishing or environmental changes, but most importantly presumes that historical landings

reflect current abundance, and does not distinguish between availability and abundance.

It is also important to note that the stock structure for each wrasse species is unknown. Each wrasse species may be highly localised (for example such as crab and lobsters which have twelve separate assessment areas in Scotland), or it may be distributed across the North Atlantic (such Northeast Atlantic mackerel). If localised, individual assessments and limits would need to be applied in each area for each species. If on a wider, e.g. UK or European level, coordinated data sampling would be required across the stock distribution, and the catch of fish in Scotland could be inconsequential to that of the stock across its distribution. Setting an arbitrary stock boundary, which neither fish or sea currents recognise, does not in itself support a sustainable fishery.

Evidence from Norway points to suboptimal consequences of establishing a catch limit for wrasse stocks. Catch limits imposed there have resulted in an Olympic fishery, whereby fishers seek to maximise effort and land as many fish as possible before the overall limit has been reached. This resulted in the fishery closing part way through the season, which can be problematic as landed wrasse are a live fish and to be most effective should be available when sea lice are found on salmon farms (which can be later in the season).

In Scotland, our preferred approach is to use a combination of management measures to protect wrasse species, such as limiting fishing gear, minimum/maximum landing sizes and an open/closed season. These management measures are based on the best available evidence and kept under review by the Scottish Government. The controls are administered via licence conditions which ensures that if they need to be amended based on emerging evidence, this can be done so swiftly it can be done swiftly.

What discussions has the Scottish Government had with the UK Government on the development of its Wrasses Complex Fisheries Management Plan, specifically what consideration has been given to developing similar measures for Scottish waters?

As the Cabinet Secretary for Rural Affairs, Land Reform and Islands noted at the RAI Committee meeting of 6 November[1], the Scottish Government has set out the selection criteria used for the first Fisheries Management Plans (FMPs) within the Joint Fisheries Statement (JFS). Our resources are focussed on delivering the 43 FMPs in partnership with the four UK partnership fisheries policy authorities, with Scotland leading on a significant number of those FMPs.

While wrasse is not a species included on the list of UK-wide FMPs in the JFS, we have commissioned the Sea Fish Industry Authority (Seafish) to undertake some initial scoping work to help inform our approach to non-quota species (which includes wrasse) FMPs in Scotland. The Scottish Government and Seafish are engaged with DEFRA on the work they are undertaking.

In Scotland, we continue to improve the evidence base and management of the wild wrasse fishery; have invested in research to continue to inform our decision making to protect the stocks; including development of a Productivity Sustainability

Assessment; are alive to developments in academic literature; have a flexible management structure in place to ensure we can respond to such developments; and are undertaking a fisheries assessment ahead of the 2025 fishery opening. A FMP is not required to progress any of this work.

Finally, I would like to take this opportunity to clarify that we received a copy of the unpublished Glasgow University report in 2024, and not in 2020, as the petitioner said in their submission of 28 October, hence why an appropriate assessment is being undertaken prior to the 2025 wild wrasse fishery opening. It is not the responsibility of the Scottish Government to publish the report that was commissioned by NatureScot.

I hope this information is helpful.

Yours sincerely,

Marine Directorate, Scottish Government

Petitioner written submission, 17 December 2024

PE2110/E: Protect wild wrasse stocks

I write in response to the Scottish Government's submission ('the submission'), dated 4 December 2024, which addressed two questions in the Committee's letter of 8 November 2024.

Total Allowable Catch Limits (TAC)

In the submission, the Scottish Government stated there are inherent difficulties in setting TAC because wrasse are landed live, and hence require handling, as well as "practical difficulties … due to the characteristics of the fleet and onboard operations". SIFT does not accept these difficulties are sufficient to justify the absence of a TAC.

Gathering information from fishers is standard practice; key information includes the number of boats licensed, the effort (e.g. the number of traps) and an analysis of all fish trapped. This data could readily be gathered in the wrasse fishery. However, the Scottish Government only requires fishers to report the total number of wrasse, by species and per ICES rectangle (at 30 Nautical Miles square, a large area for a fishery of this nature), landed (but not 'trapped') for each trip in each week and to sample only the first 20 traps deployed each week - (a fisher may deploy up to 250 traps at a time). Unsurprisingly, there is no guarantee that the first 20 traps hauled are representative of the full catch. Furthermore, full data on effort is not gathered (there is no requirement to record the number of traps deployed). So, even if there were comprehensive catch data, it would be worthless for setting TAC in the absence of full effort data.

The Scottish Government also stated that "stock structure for each wrasse species is unknown… [and]... localised, individual assessments and limits would need to be applied in each area for each species." This claim is only correct if population units

are small and local. If population units are large, then localised individual assessments are inappropriate. In other words, it is necessary to understand the population structure in order to properly assess stock. The fact that the stock structure of wrasse species is unknown (as the Government acknowledges) is precisely why there should be additional assessments undertaken. If these assessments incur a cost, then this could be borne by the commercial organisations which choose to exploit this publicly owned resource.

Furthermore, the mandatory installation and use of Remote Electronic Monitoring and Vessel Monitoring Systems to provide fishery managers with more comprehensive data on the nature, time and location of fishing activity should be required. It is unclear why fishery managers do not do so given they have that power in wrasse fishery licence conditions and do so in other fisheries (e.g. razor clams).

Lastly, the Scottish Government stated that there are “suboptimal consequences of establishing a catch limit for wrasse stocks. Catch limits imposed there [Norway] have resulted in …. fishers seek[ing] to maximise effort and land as many fish as possible before the overall limit has been reached. This resulted in the fishery closing part way through the season which can be problematic as landed wrasse are a live fish and to be most effective should be available when sea lice are found on salmon farms”.

We do not accept this response, because firstly: a daily or weekly catch limit could be set to prevent all the fishing effort taking place at the start of the fishing season. Secondly, aquaculture facilities can keep trapped wrasse alive until needed. Importantly, the statement also demonstrates how the demands of the salmon farming industry dictate the timing of the wrasse fishing season (i.e. the season is more influenced by when sea lice infestations are worst, rather than when the breeding season occurs). The failure to take adequate account of wrasse life cycles appears to conflict with the Fisheries Objectives of the UK Fisheries Act 2020.

Discussions between Scottish and UK Governments on Fisheries Management Plans

We note the submission did not provide substantive information on any discussions between the Scottish and UK Governments regarding a wrasse Fisheries Management Plan (FMP). We infer from this that no material discussions have occurred.

Furthermore, we question the Scottish Government’s claim to be “alive to developments in academic literature” given its failure (over four years) to take into account the research by Glasgow University, conducted for NatureScot, which underpinned Ministers’ obligation to undertake Habitat Regulations Assessments for wrasse fisheries within Special Areas of Conservation (see below).

Finally, the submission states that the unpublished Glasgow University report was received by Scottish Government in 2024, and not in 2020, as per my 28 October submission. I understood the report had been received by Scottish Government in 2020, because that is when it was received by NatureScot, a Scottish non-departmental public body (NDPB). I apologise for any confusion this caused but note that information of the importance in the report, when held by an NDPB, should

surely be made available to, and utilised by, Marine Directorate when making relevant policy and licensing decisions. Furthermore, and importantly, I draw the Committee's attention to PQ S6W-12866 from Rachael Hamilton MSP, answered in 2022, which asked "… the Scottish Government, in the light of recently released evidence from NatureScot showing that wrasse is a typical species of rocky reef habitats, …" The evidence referred to in this PQ is the report that the Minister stated that she did not receive until 2024. SIFT believes it is implausible for Ministers to answer a question referring to a specific piece of evidence and subsequently claim they did not know of the evidence or its implications.

In summary, SIFT believes that the submission highlights the omissions in the existing management of the wrasse fishery regarding data gathering, TAC setting, dependence upon scientific literature and the need for an FMP. This clearly shows the need for a comprehensive Fishery Management Plan for wrasse species to ensure that further management failures are avoided, the sustainability of sensitive ecosystems and the fishery ensured, and that the fishery is finally brought into compliance with the Sustainability, Precautionary, Ecosystem and Scientific Evidence objectives of the UK Fisheries Act 2020.

Petitioner written submission, 27 June 2025

PE2110/G: Protect wild wrasse stocks

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 the Scottish Government's Wrasse Fisheries Assessment 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 a 2025 study, by the Centre for Environment Fisheries and Aquaculture Science (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.