

Secretariat to the Sustainable Seafood Coalition  
ClientEarth, Fieldworks  
274 Richmond Road  
London  
E8 3QW

8<sup>th</sup> September 2020

Dear Rt Hon George Eustice,

**Subject: Seafood industry stakeholders comment on the Fisheries Bill**

We, the undersigned members of the Sustainable Seafood Coalition (SSC)<sup>1</sup>, write to you to ask for vital changes to be made to the Fisheries Bill. Legislating for effective fisheries management following the end of the transition period between the UK and the EU presents a once-in-a-generation opportunity to develop a world-leading sustainable fisheries management regime. It is in everyone's interest to get it right, and as major buyers of seafood in the UK we have particular concerns.

Simply put, ineffective management of our fisheries limits the ability of UK fishing communities to sell to responsible UK businesses. Conversely, a legislative framework for fisheries management that adheres to the sourcing requirements of some of the UK's biggest seafood buyers would increase the capacity for domestic fisheries to provide responsibly sourced seafood to UK consumers and reduce our reliance on imports.

We recognise that the Bill is a piece of framework legislation, providing tools for fisheries management rather than setting out detailed policies. However, as currently framed, it has a number of weaknesses that could undermine the effectiveness of these tools and seriously damage the sustainability of UK fisheries.

As seafood businesses, we have collectively written, and made a commitment to upholding, the SSC Codes of Conduct. These Codes underpin our values of responsible sourcing, and in order to continue sourcing from UK fisheries we will be looking at how these fisheries are managed.

As such, we ask that you address the following issues in the Fisheries Bill. We note that these issues have also been raised<sup>2</sup> by Greener UK, a coalition of 13 environmental organisations.

**1. Sustainable fishing limits**

The Common Fisheries Policy (CFP) sets out (a) an *objective* to restore fish stocks above biomass levels capable of producing maximum sustainable yield (MSY) and (b) a *legal commitment* to fish in line with MSY by 2020 in order to achieve that objective.

However, the Fisheries Bill constitutes a regression in environmental standards from these existing commitments. It does not transpose the legal commitment set out in (b) that would ensure that all stocks are fished in line with MSY. Instead it relies merely on aspirational objectives and as-yet-undrafted fisheries management plans.

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<sup>1</sup> The SSC is a group of businesses which sell seafood in the UK. We are committed to the shared vision that all fish and seafood sold in the UK comes from sustainable sources. More information is available here:

<https://www.sustainableseafoodcoalition.org/>

<sup>2</sup> [https://greeneruk.org/sites/default/files/download/2020-02/GreenerUK\\_briefing\\_Lords\\_second\\_reading\\_Withdrawal\\_Agreement\\_Bill.pdf](https://greeneruk.org/sites/default/files/download/2020-02/GreenerUK_briefing_Lords_second_reading_Withdrawal_Agreement_Bill.pdf)

Authorities have complete discretion as to whether they want to put in place a management plan for a particular stock. In addition, the plans can be disregarded if they have a negative economic impact on the fishing industry. There is therefore a real danger that authorities will be able to avoid following scientific advice (including cutting catch limits or closing a particular fishery in the event of imminent stock collapse) and risk overfishing.

The Fisheries Bill should commit the Secretary of State and fisheries authorities to set fishing limits at or below MSY, in line with international best practice. This is vital to protect against short-term political pressure to set catch limits higher than scientific advice, which would lead to overfishing.

## 2. Robust monitoring and enforcement

In order to avoid illegal fishing in UK waters, it is vitally important that the UK is able to achieve full and verifiable documentation of catches, including catch certificates. We need accurate scientific data and a true picture of what is being removed from the sea.

As set out in an amendment passed by the House of Lords during Report Stage of the Fisheries Bill, remote electronic monitoring (REM) should be rolled out on all vessels fishing in the UK EEZ. This should include vessel monitoring systems on all vessels regardless of size, together with the introduction of cameras on boats for (a) the over-10m fleet within 3 years and (b) the under-10m fleet on a phased basis according to environmental and social criteria and subject to public consultation. This would enhance accountability, assist with data on removal rates and bycatch of all marine life, and improve enforcement. Indeed, a recent report<sup>3</sup> by the Lords EU Energy & Environment Sub-Committee highlighted the lack of monitoring and enforcement and recommended that the Government and Devolved Administrations “urgently take steps to put robust mechanisms in place to monitor and enforce compliance” and stated the view that “REM is the only way to monitor compliance with the landing obligation”.

An appropriate sanctioning system should also be put in place in accordance with international law obligations on illegal, unreported and unregulated fishing to ensure that the provisions of the Fisheries Bill are effectively enforced. Eradicating illegality in the supply chain is of utmost importance for UK businesses as part of basic due diligence.

## 3. Management of shared stocks

The Fisheries Bill does not make any firm commitment as to how shared stocks will be managed. Setting an objective for the Secretary of State to consider clear sustainability criteria in relation to negotiations with the EU and other countries, including a commitment to agree catch limits that are in line with scientific advice, would help avoid another “mackerel wars” scenario where continuing disagreements between the EU, Norway, Iceland and the Faroe Islands on the size of catches and quotas led to catches set at 35% above the levels recommended by scientists.

The Fisheries Bill should therefore commit the Secretary of State to engage with other coastal states with a view to ensuring that shared stocks are co-managed in accordance with the UK’s international law obligations and in line with scientific advice.

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<sup>3</sup> <https://publications.parliament.uk/pa/ld201719/ldselect/ldeucom/395/39506.htm>

We would welcome a meeting between yourself and representatives of some SSC member businesses to discuss our concerns around the Fisheries Bill further, and would be grateful if you could make contact via the SSC Secretariat (details below) to arrange this.

Yours sincerely,

The undersigned members of the Sustainable Seafood Coalition



**22 Signatories:** Tesco, Waitrose & Partners, The Co-op, Marks & Spencer, Sainsbury's, Morrisons, Lidl GB, Whitby Seafoods, Lyons Seafoods, Bidfood, Hilton Seafood UK, Direct Seafoods, Young's, New England Seafood International, The National Federation of Fish Friers, The Big Prawn Co., World Wise Foods, Seafresh Group, Joseph Robertson Ltd, The Happy Prawn Co., Lynx Purchasing, Meridian Sea.

**SSC Secretariat:** Oliver Tanqueray, [otanqueray@clientearth.org](mailto:otanqueray@clientearth.org)