



A New Approach to Discards in Scotland

Policy Paper 1

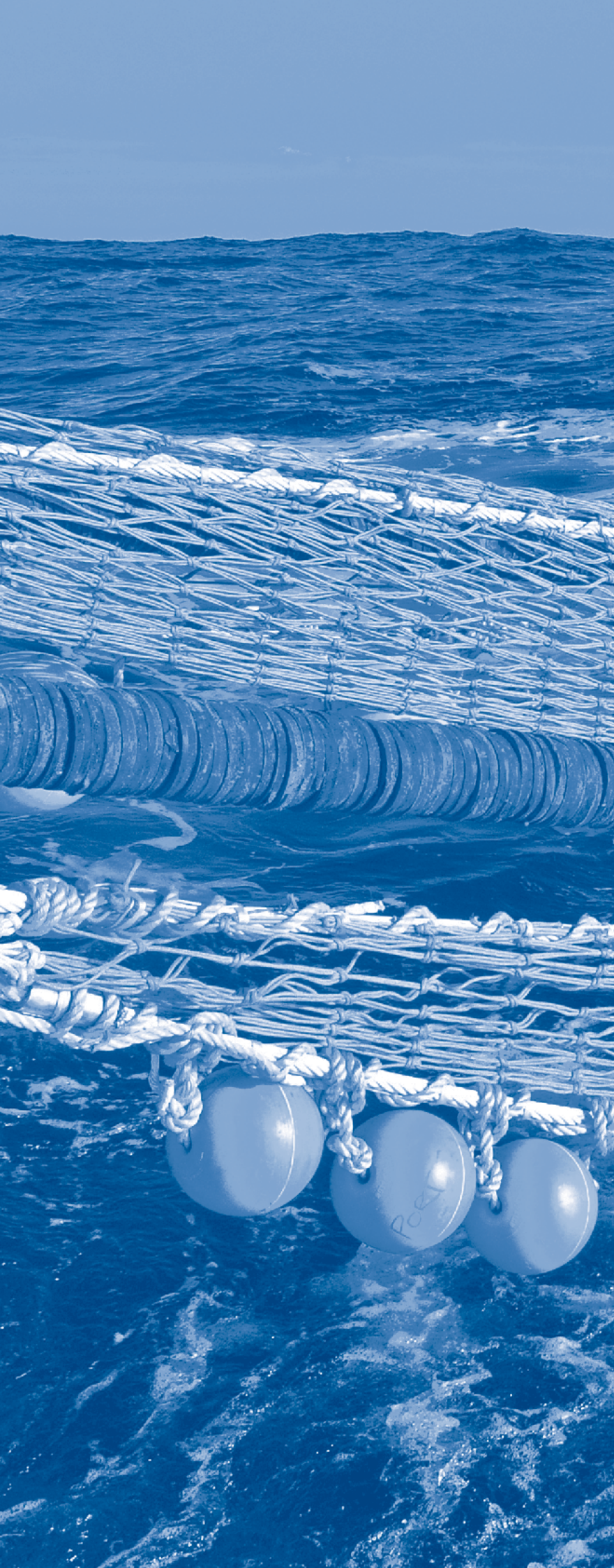
Summary

- **The current discard ban is part of the EU's Common Fisheries Policy (CFP). It is completely impractical in most Scottish fisheries. Strictly enforcing it would have serious impacts on the fishing industry and fishing communities.**
- **EU Member States with fishing industries are in the same position. This is because the discard ban attempts to prohibit the symptoms of wider problems with the CFP and does not address the causes of those problems.**
- **When the UK leaves the CFP, Scotland will have an opportunity to focus on reducing discards to the minimum practical level through appropriate management measures developed in collaboration with fishermen. This needs to be combined with effective monitoring of any residual discarding.**

The Problem with the Discard Ban

The so-called 'discard ban' implemented under the EU's Common Fisheries Policy was a naïve attempt to address a problem that had been well known to Scottish fishermen for many years. Unfortunately, instead of addressing the shortcomings of the CFP that caused (in many cases forced) fishermen to discard fish, the European Union simply sought to outlaw a symptom of those shortcomings.

The discard ban was based on an assumption that fishermen can easily choose which fish (and which sizes of fish) to catch and which not to catch. That ignores the reality that most Scottish fisheries are mixed fisheries, where several different species of fish are caught together in the same place at the same time with the same fishing gear. A Scottish fishing boat can easily catch a dozen or more different species of fish, of all shapes and sizes, in the same haul of its nets. Despite decades of research and practical trials, there is no completely reliable and effective way to select which species are caught or not caught.



Q | What are discards?

A | Discards are the unwanted fish that are inevitably caught in most fishing operations. Fish may be unwanted because the fisherman has no quota to land them or because there is no viable market for them.

Q | What is a mixed fishery?

A | Most Scottish fisheries are 'mixed', meaning that several different species are caught together, in the same place, at the same time, with the same fishing gear.

Q | What is wrong with banning discards?

A | Discards are a symptom of problems with the CFP and banning them does not address those problems. Banning discards is like trying to eliminate a disease by banning the symptoms. In practice you can only eliminate a disease by understanding and eliminating the factors that cause it.

The biggest problem is that each fishing boat has a separate quota for each species of fish, and it is highly unlikely that the amount of each species that a boat catches will exactly match what it is allowed to land. Under the discard ban a boat would have to stop fishing as soon as any one of its quotas has run out, leaving it unable to catch the rest of the fish to which it is entitled. And given that the sizes of some quotas are grossly out of line with the abundance of fish in Scottish waters, that could occur only a few months into the year. The resulting loss of income would bankrupt most fishing boats with obvious consequences for Scotland's fishing industry and fishing communities. This is often referred to as the 'choke species' problem.

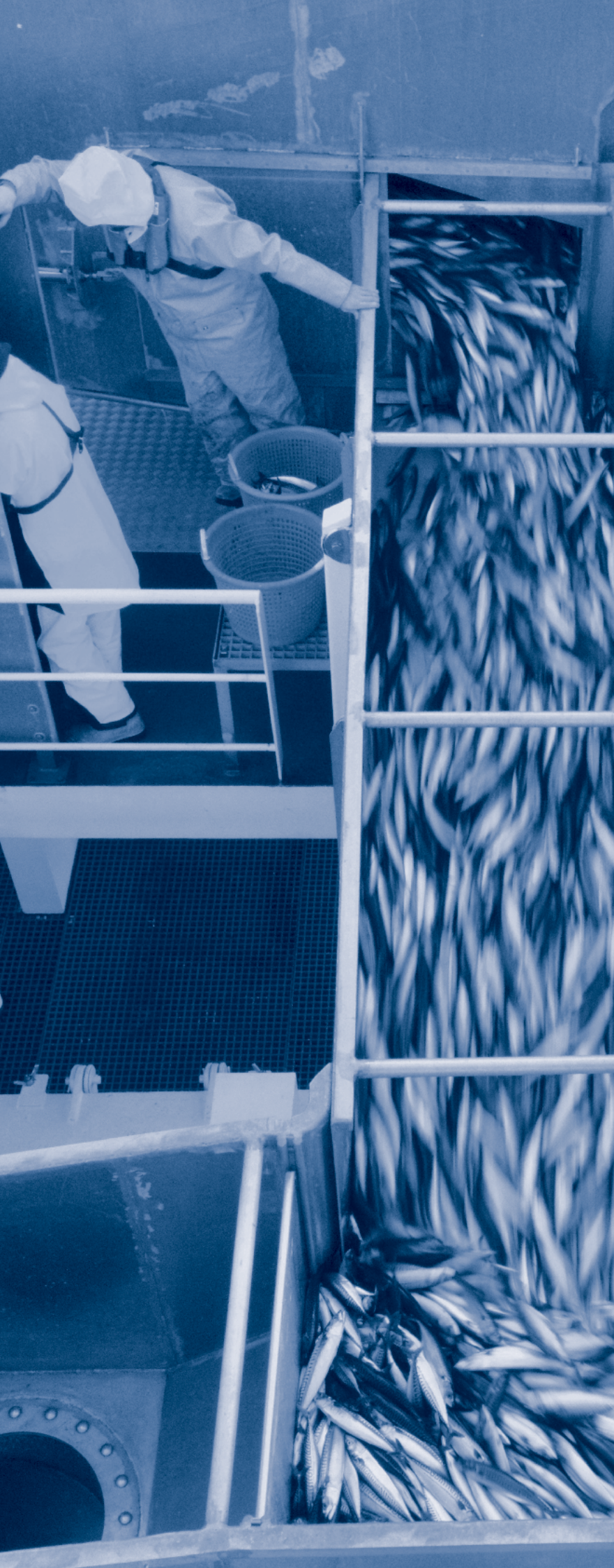
A New Approach to Discards

Shetland's fishermen believe that a new approach to discards based on common sense, cooperation and accountability is both necessary and possible once we leave the CFP. This would recognise that, realistically, some level of discarding is inevitable in Scottish mixed fisheries. The priorities would therefore be the **reduction** of discarding to the minimum practical level and **accounting** for any discarding that does occur.

Discard Reduction

We believe that discarding can be substantially reduced through appropriate packages of management measures, developed through collaboration between fishermen, government and other stakeholders. A key objective would be to reduce or eliminate the factors that currently cause fish to be discarded, and the management measures would be tailored to the circumstances of individual fisheries.

Crucially, this approach shifts the task of compliance from one of attempting to enforce an unworkable and potentially damaging discard ban to one of enforcing a package of discard reduction measures that all parties, including fishermen, have agreed to. We foresee a flexible and iterative approach where agreed management measures are monitored, reviewed and modified as necessary to increase their effectiveness and to address any problems that may arise. A key element would be that the agreed management measures would apply to all fishermen participating in the fishery, regardless of their nationality.



Q | Doesn't Norway have a discard ban?

A | Norway's 'discard ban' is shorthand for a sophisticated approach that we should seek to emulate, adapting it to conditions in our waters. According to the Norwegian government, Norway's discard ban *"is only part of a larger, comprehensive package of policies by which Norway tries, in a pragmatic way, if not to totally eliminate the discard problem, then at least to minimise it."*¹

Q | Aren't discards wasted?

A | It depends what is meant by waste. Some discarded fish will survive if they are returned to the sea, and those that don't will be eaten by other marine animals, including seabirds and whales – effectively natural recycling. If fishermen are compelled to bring unwanted fish ashore then none of them will survive, and dumping them in a landfill site is truly wasteful.

¹ Norwegian fisheries management, our approach on discarding of fish. Norwegian Ministry of Fisheries and Coastal Affairs. www.regjeringen.no/globalassets/upload/fkd/brosjyre-og-veiledninger/fact_sheet_discard.pdf

Accountability

Provided they are recorded and accounted for in scientific assessments of fish stocks, discards are not in themselves a threat to sustainable fishing. That threat only arises if the quantities of fish being discarded are not known. It is better to acknowledge that some discarding is inevitable and ensure that those discards are recorded than to pretend that discarding has been banned and have no idea how much fish might really be being discarded.

Having considered various options, we believe that observers on fishing boats are the most credible and effective means of recording discards, and are preferable to other options such as cameras. Amongst other things, observers can provide intelligent feedback on the circumstances under which discarding does occur, which can help to improve the package of discard reduction measures, and can 'do science', collecting additional data on the fish that are caught. Improved science is something that the industry has long argued for.

We envisage a programme under which industry-funded observers are placed on a representative sample of the Scottish fishing fleet to collect discards and other information.

A New Approach to Fisheries Management

A key element of the proposed new approach to discards is that it transforms fisheries management from an adversarial model where rules are devised and enforced on fishermen in a top-down manner, to a new cooperative model where fishermen are active partners in fisheries management and can use their knowledge and experience to help develop management measures that are practical and effective.

This approach extends well beyond discards. It is essential to the long-term sustainability of fishing communities and fish stocks alike.



Q | Doesn't discarding threaten sustainability?

A | Not necessarily. Provided that scientists are able to include the amount of fish discarded in their stock assessment models, as they have been doing for years, then discarding does not threaten the sustainability of fish stocks. However, unrecorded discards – as may occur under an unworkable discard ban – are a threat.

Q | What about cameras?

A | CCTV cameras on board fishing boats have been hyped as a means of eliminating discards. But they are proposed as a means of enforcing impractical discard rules and do nothing to address the causes of discarding. None of our neighbouring, non-EU, fishing nations – Norway, Iceland or Faroe – relies on cameras to reduce discards in their major fisheries.



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