



FISHY

FALSEHOODS

A series of papers debunking myths about our industry

08



Would restricting fishing achieve Good Environmental Status?

The Claim

The fact that the United Kingdom is not meeting 11 out of 15 of its indicators of Good Environmental Status (or Ecosystem Objectives) has been widely cited as justification for the Scottish Government's plans to restrict or prohibit fishing and other maritime industries (including its currently shelved proposal to ban fishing and aquaculture in at least 10% of Scotland's seas).

"I will be clear about why this Government believes that change is required. The latest assessment under the United Kingdom marine strategy indicated that we have failed to achieve 11 of the 15 indicators of good environmental status in our seas ... The case for enhanced marine protection is therefore clear"

Mairi McAllan MSP, Minister for Environment and Land Reform¹

FACT

The "11 out of 15" figure is derived from the last UK-wide marine assessment which was carried out in 2018.

FACT

The assessment reflects the situation across all the United Kingdom's seas prior to 2018, not just in the seas around Scotland.

FACT

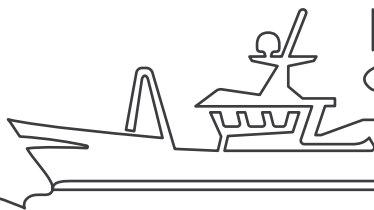
Only six of the 15 indicators were "not achieved" in 2018 (five others were "partially achieved"). In many cases the failure to achieve an indicator was due to uncertainties in the available information rather than to specific evidence of failure.

FACT

For 10 of the 11 indicators the situation was stable or improving.

FACT

Restricting or prohibiting fishing in parts of Scotland's seas is unlikely to make any significant contribution to the UK's progress towards achieving these indicators.



¹ Mairi McAllan MSP, Minister for Environment and Land Reform. Scottish Parliament, 29 June 2023. https://www.parliament.scot/chamber-and-committees/official-report/search-what-was-said-in-parliament/meeting-of-parliament-29-06-2023?meeting=15402&iob=131410#orscontributions_M16190E445P781C2509676









Good Environmental Status

The indicators of Good Environmental Status (also sometimes referred to as ecosystem-objectives) were defined in the UK Marine Strategy in 2012.² That strategy identified 15 targets and indicators of Good Environmental Status for UK seas and provided a quantitative scale for assessing the UK's progress towards Good Environmental Status. The definition of targets and indicators of Good Environmental Status was a requirement of the EU Marine Strategy Framework Directive.

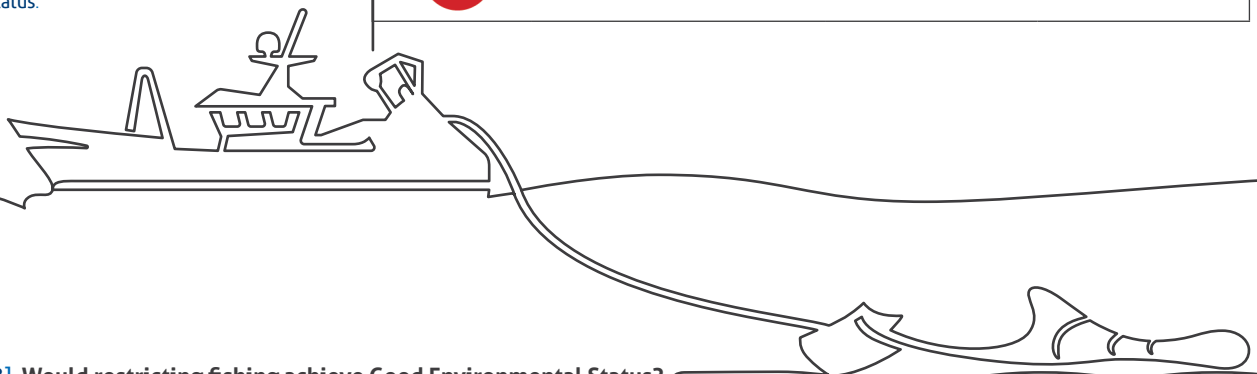
The Indicators










The UK Marine Strategy defined 15 indicators of Good Environmental Status. The table below summarises their status as of the last UK Marine Assessment in 2018. For each indicator this shows whether the target has been wholly or partially achieved and how the status had changed during the period from the first assessment in 2012 to 2018.³

	Indicator	Indicator Achieved?	Change in Situation
	Cetaceans <i>(Whales & dolphins)</i>	Partially	Stable
	Seals	Partially	Improving
	Birds	No	Declining
	Fish	No	Improving
	Pelagic Habitats <i>(Plankton)</i>	Partially	Stable
	Benthic Habitats	No	Stable

² Marine Strategy Part One: UK Initial Assessment and Good Environmental Status. December 2012. <https://www.gov.uk/government/publications/marine-strategy-part-one-uk-initial-assessment-and-good-environmental-status>.

³ This summary information is taken from the United Kingdom Marine Monitoring and Assessment Strategy's "Summary of Progress Towards Good Environmental Status" (2018): <https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status>.

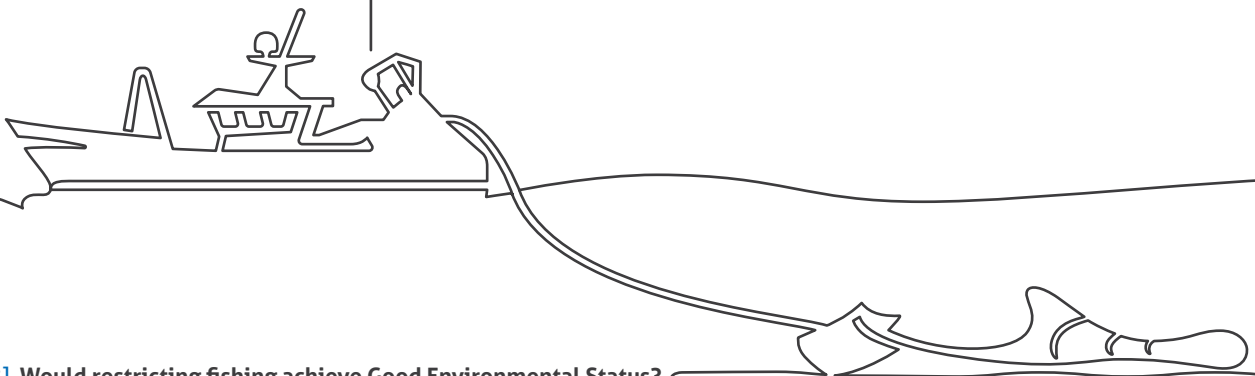


	Indicator	Indicator Achieved?	Change in Situation
	Invasive Species	No	Stable
	Commercial Fish	No	Improving
	Food Webs	Partially	Improving
	Eutrophication <i>(Nutrient Pollution)</i>	Achieved	Stable
	Hydrographical Conditions	Achieved	Stable
	Contaminants	Achieved	Stable
	Contaminants in Seafood	Achieved	Improving
	Litter	No	Stable
	Man-Made Sound	Partially	Stable

In summary, of the United Kingdom's 15 indicators of Good Environmental Status:

- ❖ Four had been achieved in 2018.
- ❖ Five had been partially achieved.
- ❖ Six had not been achieved.

For almost all the indicators that had not been achieved (10 out of 11) the situation in 2018 was 'stable' or 'improving'. There was only one indicator for which the situation was declining (birds).



Why have the UK's indicators of Good Environmental Status not been achieved?

The indicators of Good Environmental Status provide a very broad snapshot of the situation across the entirety of the United Kingdom's seas in 2018.

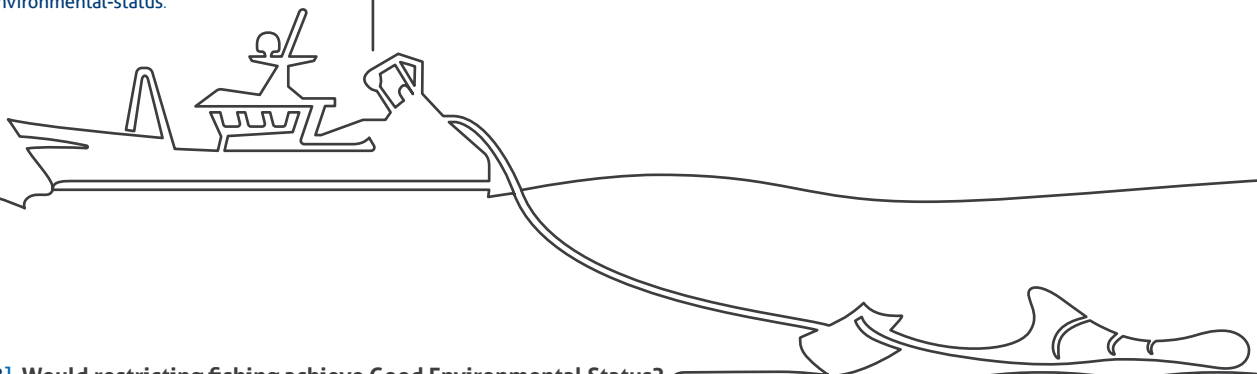
The assessment carried out in 2018 of progress against the United Kingdom's indicators of Good Environmental Status was based on the analysis of large amounts of information applying to many different species or parameters across a very large geographical area (from the Celtic Sea and English Channel to north of Scotland, and from Rockall to the North Sea).⁴

For several of the indicators, **uncertainty** is a key reason why Good Environmental Status could not be shown to have been achieved. That is, there was no actual evidence that Good Environmental Status had **not** been achieved; there just wasn't enough information to show that it had.

In other cases, Good Environmental Status was known to have been achieved for some species or measures but was unknown for others. In still other cases, Good Environmental Status was known to have been achieved in some parts of the UK's seas but is not in other areas.

For almost all the indicators the reasons **why** Good Environmental Status had not been achieved were not clear. Although human activities may have been a contributory factor in some cases other factors, such as environmental change, were also thought to be important.

⁴ For full details of the assessment of each indicator follow the 'More detail about this assessment' links on the Summary of Progress page: <https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status>.



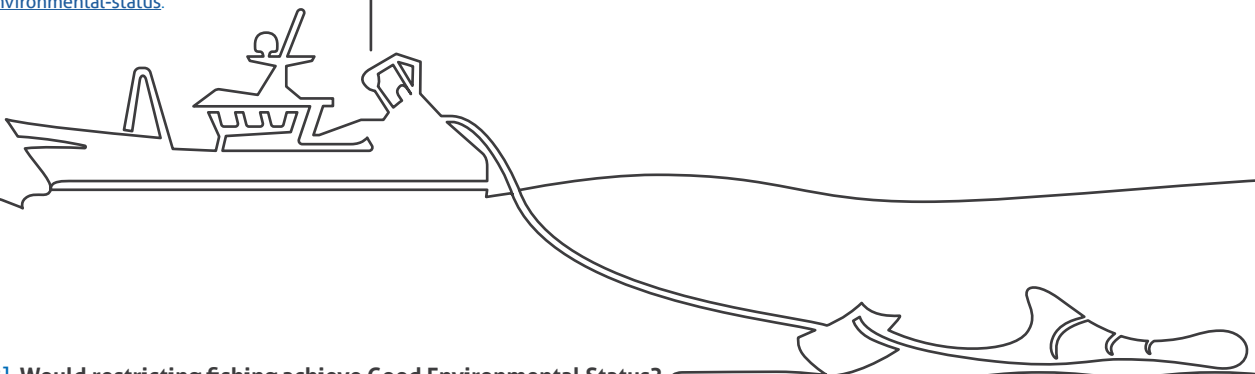
Would restricting fishing in Scotland help the UK achieve its indicators of Good Environmental Status?

The indicators of Good Environmental Status defined in the UK Marine Strategy reflect the state of the marine environment across the entirety of the United Kingdom's seas (as it was in 2018). In many cases the failure to achieve Good Environmental Status was not a result of human activities. In many cases that failure simply reflected uncertainty and lack of information, or a failure to achieve Good Environmental Status across **ALL** of the UK's seas.

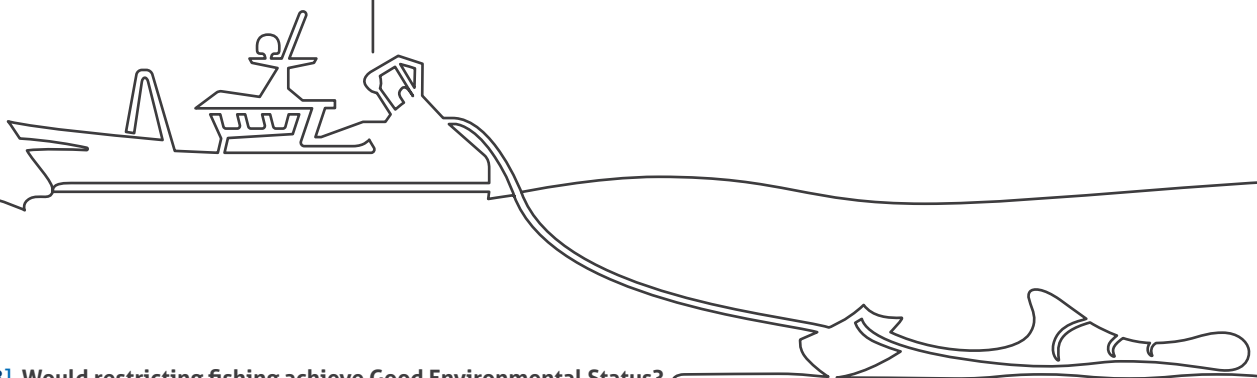
For several reasons, it is unlikely that restricting or prohibiting fishing or other maritime industries in marine protected areas in Scotland's seas would make any significant contribution to the achievement of the United Kingdom's indicators of Good Environmental Status:

- ❖ In some cases, the human activities that may have contributed to the failure to achieve Good Environmental Status would not be prohibited or constrained. For example, shipping, which contributes to man-made noise in the marine environment.
- ❖ In some cases, the ranges of the species or the areas of the processes that were assessed as indicators of Good Environmental Status are much larger than could be encompassed in any Scottish marine protected area. For example, most species of fish have large ranges, are highly mobile, and will not recognise the boundaries of protected areas.

⁴ For full details of the assessment of each indicator follow the 'More detail about this assessment' links on the Summary of Progress page: <https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status>.



- ❖ In some cases, human activities were not thought to be contributing significantly to the failure to achieve the indicators of Good Environmental Status. For example, changes in planktonic communities (pelagic habitats) are most likely driven by prevailing environmental conditions. Prohibiting or restricting human activities (such as fishing) will not, therefore, help achieve these indicators.
- ❖ It is not enough to achieve an indicator of Good Environmental Status in only part of the UK's seas, for example, within a protected area within the Scottish part of the UK's seas. These indicators reflect environmental status across **ALL** of the UK's seas. Indeed, in many cases where an indicator has not been achieved it has been achieved in some areas but not in others.



Conclusions

The fact that 11 out of 15 of the UK's indicators of Good Environmental Status are not being met may provide dramatic headlines but that doesn't necessarily justify restricting or banning activities such as fishing and aquaculture in Scotland's seas.

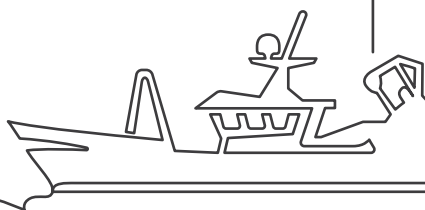
These indicators of Good Environmental Status (defined in the United Kingdom's Marine Strategy) provide a very broad snapshot of the situation across ALL of the United Kingdom's seas. They cannot be assumed to reflect the state of Scotland's seas which have not been subject to a specific assessment to determine their own environmental status.

Further, they provide a snapshot of the situation in the UK's seas at the time the last assessment of the UK's progress towards Good Environmental Status was carried out. That was in 2018, which was five years ago, and much of the information used in that assessment would have been older still. So, these indicators do not reflect the current state of Scotland's (or the UK's seas).

Given that at least six of the indicators were classed as improving in 2018 it is perhaps not unreasonable to think that the situation now may be better than it was five or more years ago. And given that only one of the 15 indicators was declining in 2018 it seems unlikely that the situation is significantly worse now than it was then.

Overall, it seems unlikely that restricting or banning fishing or other maritime industries in marine protected areas in Scottish waters would make any significant contribution to the achievement of the United Kingdom's indicators of Good Environmental Status. Either because relevant human activities would not be restricted; because human activities are not responsible for the failure to achieve Good Environmental Status; because protected areas would be too small in relation to the relevant species or habitat ranges; or because Good Environmental Status reflects conditions across the entirety of the United Kingdom's seas, not just in selected areas of Scotland's seas.

Above all, those claiming that the indicators of the UK's progress towards Good Environmental Status (ecosystem objectives) justify restricting or banning fishing or aquaculture have not shown **how** prohibiting these important industries would contribute to the UK achieving Good Environmental Status for its seas.



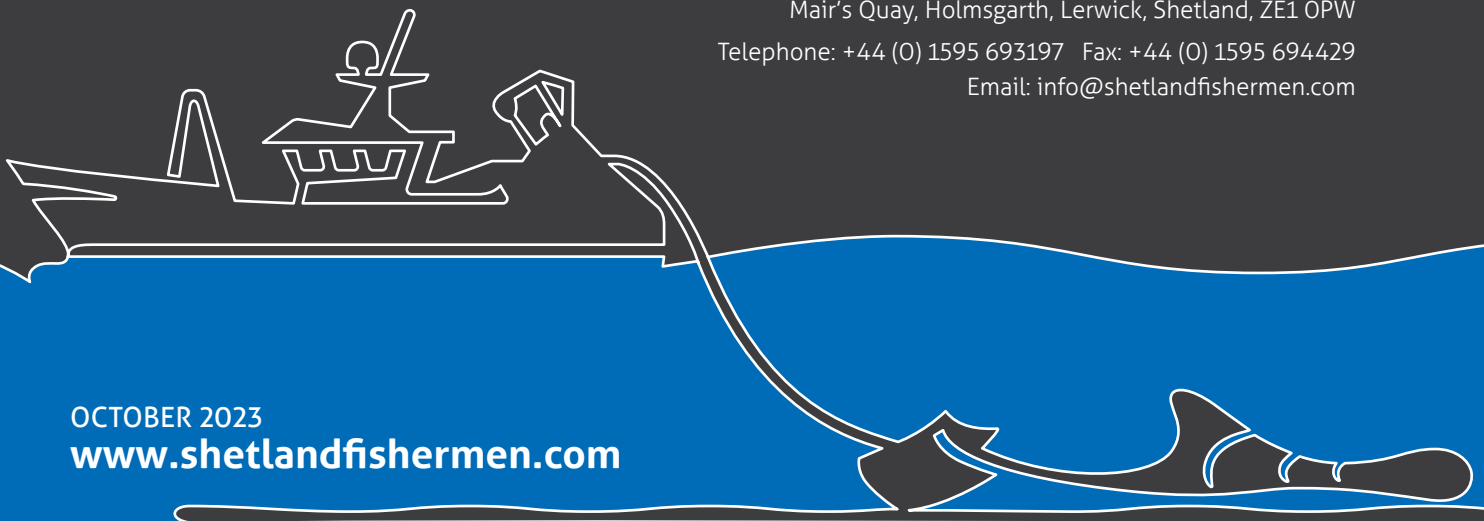


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