



## Our big idea for the National Food Strategy

# Ban the sale of endangered fish in the UK

Our idea is to ban companies from selling fish for which the population is most critically depleted, and/or caught using methods that most seriously threaten our marine ecosystems. These are listed by the Marine Conservation Society as 'Fish to Avoid' or 'red-rated' in the *Good Fish Guide*<sup>1</sup>.

This idea would help to deliver the priorities of safe, affordable food by ensuring the UK's most depleted fish populations like Isle of Man scallops, Irish herring and North Sea nephrops (scampi) recover. This idea will improve the resilience of our fisheries in the face of future climate change and help tackle the biggest threat to our oceans - overfishing. Recovering very depleted fish stocks would create thousands of jobs in the fishing industry<sup>2</sup> and plough millions into fishing communities<sup>3</sup>. In fact doing so is vital to curb the loss of jobs in this sector over time.

### Why do we need this intervention?

Our fisheries management is failing. Whilst there are some great examples of sustainable fishing in the UK, as a whole the last few decades have seen the UK's fish populations (and consequently catches) incrementally decline, and with them jobs in fishing and fish processing<sup>4</sup>. The latest analysis of the impact of climate change on our oceans says that fish populations require greater protection than previously thought<sup>5</sup>.

Because of their very depleted status, some of our fisheries are failing to meet their economic potential. If allowed to recover:

- Scottish Nephrops could yield an extra 14,000 tonnes worth £70 million
- We could double cod catches generating £43 million
- An additional 142,000 tonnes of herring could be caught per year, worth £17 million<sup>6</sup>

The products sold in shops and restaurants should reflect the scientific consensus of safe to eat. Despite public awareness efforts, celebrity campaigns, voluntary supermarket and restaurant initiatives, and some businesses adopting robust sustainable fish policies, too many businesses are buying fish which is causing serious environmental destruction and there is not enough pressure for them to change.

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<sup>1</sup> The Good Fish Guide online tool, produced by the Marine Conservation Society is here: <https://www.mcsuk.org/goodfishguide/search>

<sup>2</sup> Jobs lost at sea - Overfishing and the jobs that never were – New Economics Foundation: [https://b.3cdn.net/nefoundation/e966d4ce355b7485c1\\_a7m6brn5t.pdf](https://b.3cdn.net/nefoundation/e966d4ce355b7485c1_a7m6brn5t.pdf)

<sup>3</sup> Oceana's Recipe for Fish Recovery - APRIL 2018 - [https://eu.oceana.org/sites/default/files/more\\_food\\_more\\_jobs\\_and\\_more\\_jobs\\_in\\_the\\_uk.pdf](https://eu.oceana.org/sites/default/files/more_food_more_jobs_and_more_jobs_in_the_uk.pdf)

<sup>4</sup> House of Commons Briefing Paper - UK Sea Fisheries Statistics By Elise Uberoi - Number 2788, 5 December 2017 <https://researchbriefings.files.parliament.uk/documents/SN02788/SN02788.pdf>

<sup>5</sup> IPCC - The Ocean and Cryosphere in a Changing Climate (Summary for Policymakers) September 2019 - [https://report.ipcc.ch/srocc/pdf/SROCC\\_FinalDraft\\_FullReport.pdf](https://report.ipcc.ch/srocc/pdf/SROCC_FinalDraft_FullReport.pdf)

<sup>6</sup> Oceana's Recipe for Fish Recovery - APRIL 2018 - [https://eu.oceana.org/sites/default/files/more\\_food\\_more\\_jobs\\_and\\_more\\_jobs\\_in\\_the\\_uk.pdf](https://eu.oceana.org/sites/default/files/more_food_more_jobs_and_more_jobs_in_the_uk.pdf)

At the moment the burden is on businesses and the consumer to check whether they are buying an endangered species when they buy fish. This is unacceptable given the crisis in our oceans and we believe it would make it easier for both if we simply stopped them from entering the supply chain.

### What impact would this policy have?

At the moment, a ban on selling red-rated fish would affect 15 of the main species caught in the UK (see table 1), but only those caught in certain areas, with certain fishing nets. Fishers already declare where and how their fish is caught, so this wouldn't add extra record keeping. If they declared their fish to be from an area which is red-rated, it would be illegal for the trader to buy it. Fishers' declarations would need to be backed up with GPS recording data. (GPS trackers will be mandatory from next year).

**Table 1 – Major UK fisheries on the red-rated list<sup>7</sup>**

Red-rated UK fish Species	Caught in which area?	By which method?	Roughly, what is the problem?
<b>Cod</b>	Some areas of the North Sea, Baltic Sea and Celtic Seas	All methods in these areas	Some populations are being overfished and stocks are at critically low levels
<b>Cuttlefish</b>	Cornwall	Beam trawl	A combination of low stocks, overfishing and damaging fishing method
<b>Eel (conger and European)</b>	All areas	All methods	Eel is listed in the IUCN Red List as a critically endangered species.
<b>Halibut</b>	All areas	All methods	Stock status is unknown. The IUCN list the species as 'Endangered' (but this was last assessed in 1996).
<b>Herring</b>	Some areas in the West of Scotland	All methods	Scientists advise zero catch as the stock is so depleted
<b>Nephrops (Scampi)</b>	Small areas in North Sea and Celtic Sea	Trawl	A combination of very depleted stocks and overfishing
<b>Red Mullet</b>	Some parts of North Sea and Channel	Trawl	Overfished
<b>Plaice</b>	West of Ireland	Trawl	Scientists advise zero catch as the stock is so depleted
<b>Ray species</b>	Most of UK	Trawl	Overfished and populations very depleted
<b>Scallops</b>	Some localised areas	Dredge	Damaging to marine habitats
<b>Shark</b>	All UK	All methods	Populations very low
<b>Skates</b>	All UK	All methods	Prohibited species as populations have declined over the latter half of the 20th century. Some listed as 'critically endangered'.
<b>Sturgeon</b>	All UK	All methods	The IUCN classifies 16 species as critically endangered
<b>Whiting</b>	Just the west of the UK	All methods	Very depleted and overfished

### Would this hurt fishers?

This idea would be a huge benefit to the fishing industry. Rebuilt stocks would deliver jobs and boost income remarkably quickly<sup>8</sup> but at the moment there is no significant recourse for those that are spoiling the oceans for everyone.

### What about red-rated fish caught accidentally?

<sup>7</sup>Data from the Good Fish Guide: <https://www.mcsuk.org/goodfishguide/search>

<sup>8</sup> The New Economics Foundation estimate that most stocks can recover completely within 5 years: No Catch Investment, Rupert Crilly and Aniol Esteban, September 2012 [https://neweconomics.org/uploads/files/46c2fb127533c643de\\_rvm6b40rz.pdf](https://neweconomics.org/uploads/files/46c2fb127533c643de_rvm6b40rz.pdf)

We don't think it makes sense to criminalise fishers for accidentally catching red-rated fish, but removing the market for it creates a very strong incentive not to. We have identified a risk that fishers may throw red-rated fish overboard if it is caught accidentally but doing so is illegal already under the UK's Landing Obligation<sup>9</sup>. We support improved implementation of the discard ban through improving nets to reduce accidental catches, and CCTV cameras on board.

## **What does this big idea need to succeed?**

### **Legislation**

We already have legislation to stop the sale of certain animal products through CITES<sup>10</sup> and this will be carried over after Brexit through the Withdrawal Act. This legislation could be enacted in law through secondary legislation, as an amendment to the Act that brings CITES into UK law.

### **Support for improvement projects**

This is absolutely vital. The aim of this idea is not to punish fishers but give them incentive to improve, and support in the run-up to the enactment of legislation. Fisheries can move off the red-rated list if they are officially engaged in a credible improvement project (these can be set up in around 6-9 months and normally have a timescale of 3 to 5 years. There are some excellent improvement projects happening in individual fisheries already (see Project UK Fishery Improvements<sup>11</sup>) and they are a great blueprint for how this could work across the UK.

It is vital that funds are available to support these improvements where necessary, just as farmers receive financial support for protecting habitats on land. The improvements required will vary depending on the boat and the area but could include changing to more sustainable nets, cutting catches in the short-term to let stocks recover, recording data and installing CCTV monitoring, or funding a formal stock assessment.

### **Lead-in time**

An appropriate lead-in time is needed to ensure that all UK fisheries have chance to improve sufficiently to be taken off the red-rated list. We suggest 3 years.

### **Support for rating fish**

The 'red-rated' list is compiled by the Marine Conservation Society. They may require a boost in resources to make sure the list is always accurate, up to date, and scientifically-sound.

## **Would this disproportionately affect UK producers?**

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<sup>9</sup> Webpage - Landing Obligation 2019 - Rules and regulations - January 2019.

<https://www.gov.uk/government/publications/landing-obligation-2019-rules-and-regulations>

<sup>10</sup> CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) is a [multi-country treaty](#) adopted in 1963. It aims to ensure that international trade in animals and plants does not threaten their survival, but it only really affects a few of the most critically endangered species.

<sup>11</sup> Project UK Fisheries Improvements: Website detailing a number of local improvement projects, with their gap-analysis and action plans – Seafish and the Marine Stewardship Council: <https://www.seafish.org/article/project-uk-fisheries-improvements>

No. There are lots of non-UK fish that is red-rated and placing the same ban on imported fish would make sure this is a level playing-field. This policy would actually be likely to make UK fish more attractive than overseas imports.

### **Is there any evidence of success?**

The UK would be the first country in the world to ban sales of the least sustainable fish, and it would be a ground-breaking approach. A number of countries have banned the sale of certain species on conservation grounds though:

- Last year, the UK banned the sale of ivory because demand was putting pressure on wild populations<sup>12</sup>
- China has banned citizens from eating certain species on conservation grounds<sup>13</sup>
- The EU has banned the importing of illegally-caught fish<sup>14</sup>

We also believe this intervention is within Government's intentions for our oceans. The Government has promised to be the 'Greenest government yet' and set a 'gold standard for sustainable fishing around the world'<sup>15</sup>.

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<sup>12</sup> Government confirms UK ban on ivory sales – Press release – 3 April 2018 <https://www.gov.uk/government/news/government-confirms-uk-ban-on-ivory-sales>

<sup>13</sup> News article - China toughens laws on eating endangered animals - Loulla-Mae Eleftheriou-Smith - Monday 11 July 2016 16:27  
<https://www.independent.co.uk/news/world/asia/china-toughens-laws-on-eating-endangered-animals-a7131266.html>

<sup>14</sup> EU COUNCIL REGULATION (EC) No 1005/2008 - 29 September 2008 - establishing a Community system to prevent, deter and eliminate illegal, unreported and unregulated fishing <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:286:0001:0032:EN:PDF>

<sup>15</sup> The Rt Hon Michael Gove MP – Forward on the publication of the White Paper on future fisheries policy, October 2018 - <https://www.gov.uk/government/consultations/fisheries-white-paper-sustainable-fisheries-for-future-generations/sustainable-fisheries-for-future-generations-consultation-document>