

Scottish Pelagic Sustainability Group

Sustainable and Environmental Policy

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1. Introduction

The Scottish Pelagic Sustainability Group (SPSG) was established in 2007 following a strategic review of the Scottish pelagic sector. Representing all parts of the industry; from fishing through to processing and marketing; the SPSG assumed responsibility for driving the industry's sustainable and environmental development. Since its formation, the Group has delivered a wide range of initiatives, including sustainable certification, scientific research programmes, and enhanced data collection.

The UK Refrigerated Sea Water (RSW) pelagic fleet is centred in North-East Scotland and Shetland. The fleet fishes with modern, target specific, technologically advanced vessels which supply a progressive, well-equipped and highly efficient processing sector. The industry harvests and processes some of the most abundant pelagic fish stocks in the Northeast Atlantic and North Sea, including mackerel, blue whiting, and several herring stocks.

Today it is expected that the world's fisheries resources are harvested from demonstrably sustainable sources. This document sets out the sustainable ambitions and commitments of the Scottish pelagic industry in response to that expectation.

2. Background

Pelagic fisheries in the Northeast Atlantic represent a significant economic and strategic resource for the seafood industries of participating nations. These fisheries supply large volumes of high-quality, oil-rich fish that are in strong global demand. This success has been underpinned by sustained investment in modern fishing vessels and advanced processing facilities. However, the scale and transboundary nature of these fisheries necessitate careful and often complex regulation to ensure they are harvested responsibly and sustainably.

During the post-war period of the twentieth century, global fisheries experienced rapid development driven by market demand. Coastal States invested heavily in expanding and modernising fishing fleets to capitalise on growing consumption of fish and fishery products. By the 1980s, however, it became clear that fisheries resources could not sustain uncontrolled increases in exploitation. In particular, concerns emerged regarding unregulated fishing on the high seas, including fisheries targeting straddling and highly migratory stocks occurring both within and beyond Exclusive Economic Zones (EEZs).

These challenges prompted the recognition of a need for a new approach to fisheries management that incorporated conservation and environmental considerations. In response, the Food and Agriculture Organization (FAO) Governing Bodies recommended the development of a global Code of Conduct for Responsible Fisheries. Adopted in 1995, the Code established principles and standards for the conservation, management, and development of fisheries and remains a cornerstone of national and international efforts to ensure the sustainable exploitation of aquatic living resources.

Scottish pelagic fisheries are regulated under the UK Fisheries Act 2020, which became law following Royal Assent on 23 November 2020. The Act took full effect following the UK's

departure from the European Union on 1 January 2021, returning full control of UK fishing waters for the first time since 1973.

The Fisheries Act sets out eight statutory fisheries objectives and places a legal requirement on the UK's four national fisheries policy authorities—Marine Management Organisation (MMO), Scottish Ministers, Welsh Ministers, and the Northern Ireland Department to collaboratively produce a Joint Fisheries Statement (JFS)¹. Published in November 2022, the JFS establishes the policy framework for achieving the objectives of the Act and enables the development of fisheries management plans to deliver the UK's ambition for sustainable fisheries.

3. Concepts and definitions of sustainability

In this policy document, it is important to clarify what is meant by sustainability.

Within marine ecosystems, sustainability refers to the management of resources in a way that ensures natural capital stocks do not decline over time, while maintaining production opportunities for the future.² In fisheries, however, the term sustainability is often used more specifically to describe the long-term exploitation objectives for a given stock.

Sustainable fishing activities are those that do not cause, or lead to, undesirable changes in the biological and economic productivity, biological diversity, or ecosystem structure and functioning from one human generation to the next.³ In terms of catch or yield from a defined stock, sustainable yield is the amount of biomass, or number of individuals, that can be harvested without compromising the ability of the population or ecosystem to regenerate itself.⁴

There has been a growing consensus that fish stocks should be managed to achieve Maximum Sustainable Yield (MSY). This approach aims to catch the maximum quantity that can be safely removed from a stock while maintaining its capacity to produce sustainable yields in the long term. This reflects commitments made at the World Summit on Sustainable Development (WSSD) in Johannesburg in 2002, where participants agreed to work towards MSY in global fisheries.⁵

4. The Sustainable Policy of the Scottish pelagic industry

The Scottish pelagic industry is committed to achieve the principle of sustainability in all fisheries in which it operates and regards this policy as an essential tool in pursuit of this goal.

To underpin this policy the Scottish pelagic sector supports the following principles:

- The industry will take all appropriate and necessary measures to ensure that the pelagic fisheries in which it operates are fished and managed responsibly to preserve the sustainable use of all marine resources and their habitats for current and future generations.
- The industry recognises that pelagic fisheries are a shared resource at national and international level; and as such will cooperate with all industry stakeholders and regulatory authorities in their sustainable management.
- The industry supports the equitable implementation of the UK Fisheries Act 2020 and Scotland's Future Fisheries Management Strategy 2020-2030.
- The industry recognises International Council for the Exploration of the Sea (ICES) Advice as the basis of best available scientific advice which supports management measures governing pelagic fisheries and actively contributes scientific input to ICES.
- The industry is committed to the maximization of product quality. This is achieved through the application of best practice in all fishing activities; from the methods of fishing; bringing the catch aboard; onboard storage of the fish through to the discharging of the catch once in port. It is also committed to encouraging training of personnel to achieve these objectives.

Scottish pelagic processing factories are located in the North-East of Scotland and Shetland near to the main fishing grounds. These modern plants are equipped with the latest machinery for receiving, grading, filleting, packing, and freezing herring mackerel and blue whiting. They are specifically designed to handle high volumes of pelagic fish and can ensure the highest quality is maintained throughout the process.

The industry is further committed to minimise the carbon footprint of pelagic fish production and has supported analysis and benchmarking studies^{6,7} of the carbon footprint of Scottish pelagic fisheries and will use findings to deliver continuous improvement to reduce these impacts.

5. Operational management

The sustainability of the Scottish pelagic industry operates to ensure the socio-economic viability of the businesses and communities it supports and will do so, whilst operating to the highest standards of maritime and employment safety.

The Scottish pelagic industry fully supports the implementation of new legislation to deliver improved standards at sea for fishermen through the International Labour Organisation's Work In Fishing Convention (ILO 188). This builds on existing standards to provide safer and fairer working, living and employment conditions for all fishermen.

The Scottish pelagic industry will:

- Operate vessels and carry out fishing activity to the highest possible standards of maritime safety. Ensuring that all fishing gear and vessel equipment conforms to safety requirements, that regular inspection and scheduled maintenance are carried out in addition to statutory inspections, paying particular regard to engines, lifting and safety equipment.
- Always provide a safe working environment for all members of crew and any third parties, whilst promoting a fair and amicable working environment which seeks to encourage strong teamwork.
- Ensure that all training needs of fishermen are met in terms of the statutory minimum MCA requirements, and furthermore; will strive to provide the best training, education, and awareness programmes to the benefit of all members.
- Practice a reasonable and mutually respectful attitude to all sea vessels and other users towards the exploited resource and the marine environment. Where competition for sea space arises whilst working on fishing grounds, amicable agreement or compromise will be sought with other fishing parties to avoid conflicts of interest.
- Be aware of, and so far as possible adopt the Global Ghost Gear Initiative Principles of Best Practice for fishers and vessel operators to prevent, mitigate and recover abandoned, lost, or discarded fishing gear (ALDFG).⁸

Maximising the quality and marketing opportunities of Scottish pelagic fish is the basis for success of the industry. All stakeholders of the pelagic industry will:

- Maintain the highest possible standards of hygiene onboard vessels and throughout the process chain.
- Optimise the fishing, handling, storage, and processing of fish to maintain the highest quality, market value and nutritional integrity.

- Provide advanced landing information concerning quality, size, volume and traceability of the catch in order to maximise processing potential and improve the efficiency of landing activities.
- Operate all processing plants with defined Quality Management Systems and meet strict hygiene and food safety standards which are monitored by both local Environmental Health Departments and by the standards of their customers.

6. Commitment to a Sustainable Development Programme

The Scottish pelagic industry is committed to sustainable fisheries. The SPSG was established in 2007 to deliver this commitment aiming to acquire independent certification for the main pelagic fisheries in which it operates. The group was initially successful in gaining Marine Stewardship Council (MSC) certification for North Sea herring and Western mackerel fisheries.

Since formation, the SPSG has evolved and developed a wider approach in its activity to support sustainable development of pelagic fisheries. The group is not only responsible for sustainable certification, but it also promotes and supports data collection in factories, supports scientific research and actively employs scientific staff to take forward projects to enhance species knowledge and stock management (see section 11).

The SPSG remains committed to the principles of sustainable certification, currently North Sea herring holds MSC certification. Due to complex international management issues impacting all pelagic coastal States beyond the control of the SPSG, the group is at present unable to meet the criteria required to maintain certification across all Scottish pelagic stocks.

The SPSG is an active member of the Executive Committee of the Association of Sustainable Fisheries (ASF). Within ASF the SPSG offers its experience and provides input to the forum assisting in sustainable policy development at an international level.

The SPSG continues to explore the potential benefit of any programmes or projects which promote and enhance the marine ecosystem and environment, thus reducing the environmental impact and footprint the fleet may have during fishing operations.

In particular pelagic vessels will:

- Follow practices that minimise the emissions of dangerous substances during all fishing activities. As an absolute minimum, vessels will meet national standards but will endeavour to operate at a level promoting best practice.
- Explore new and innovative technologies to minimise fuel consumption and other practices to save energy.^{6,7}
- Follow good fishing practices which minimise gear loss and make every effort to follow procedures/protocols to mark and report lost gear. Wherever possible vessels will make every effort to retrieve lost gear.

- Ensure end of life gear is taken ashore and disposed of through a safe and recognised route. Many Scottish pelagic vessels now recycle their end-of-life gear through a voluntary scheme which donates monies generated to support charitable foundations working across Africa.
- Operate mandatory waste management plans on-board and will communicate and implement the plan during all operations.

Whilst marine litter is not frequently encountered in pelagic fishing, the SPSG fleet are committed to retain and dispose of any marine litter caught through the KIMO Fishing for Litter programme.

7. Responsible fishing

Corporate Social Responsibility (CSR) has become a fundamental business model supporting a social 'license to operate' for the business, it's stakeholders, customers, and the general public. CSR programmes can focus on environmental, ethical, philanthropic and financial responsibilities. Fishing vessel operators are considered the same as any other business, and therefore vessel owners and operators should be aware of the these demands from their supply chains and apply standards to meet these requirements.

The Scottish pelagic fleet supports CSR practices to help the sector mitigate risk and to enhance the brand recognition of Scottish pelagic fish. The Scottish pelagic industry was an early adopter and active participant to the Seafish Responsible Fishing Scheme (RFS), supporting it to provide reassurance to the supply chain, customers, and society in general of their responsible approach to good operational practice.

The Scottish pelagic industry now supports the Responsible Fishing Vessel Standard (RFVS) which has replaced the RFS. Scottish pelagic vessels were actively involved in piloting the RFVS during the final stages of development. Several vessels in the Scottish pelagic fleet have achieved certification to this global standard: demonstrating ongoing commitment to operational best practice in line with internationally agreed protocols and guidelines.

8. Management regimes and Coastal State/bilateral agreements

Blue whiting, Atlanto-Scandian herring and mackerel fisheries are managed by Coastal States and ratified through NEAFC agreements. North Sea herring is jointly managed by the UK, European Union and Norway. The West of Scotland herring, North Sea horse mackerel and western horse mackerel are jointly managed by the UK and the European Union.

The SPSG closely follows the management process and keeps wider stakeholders up to date with new developments in the management of these stocks.

9. Long Term Management Strategies

Long Term Management Strategies (LTMS) are in place to manage the blue whiting, North Sea herring and Atlanto-Scandian herring fisheries. A LTMS for NE Atlantic mackerel is foreseen to be developed in 2026.

Given there has been consistent overshoot of the recommended TAC for the Atlanto-Scandian herring and blue whiting fisheries; implementation of current LTMS may no longer be precautionary.

10. Sustainability principles

To realise the goals of the sustainable policy as described in section 4, members acknowledge that they must operate in a manner which clearly demonstrates these principles. Pelagic stocks are an international resource which migrate through UK, third country and international waters throughout different seasons of the year.

The Scottish pelagic industry demonstrates its commitment to sustainability by:

- Supporting protocols which promote international cooperation between the UK, and third countries of this multi-national industry who are involved in the exploitation of pelagic fisheries.
- Engaging with other industry client groups who work to realise sustainable certification of NE Atlantic pelagic stocks.
- Accepting that to have a well-managed and fairly allocated share of fishing opportunity for all pelagic species; fish stocks must be estimated using the most reliable, mathematical, and scientific assessment models available. The quality of such data is paramount to the accurate process of determining Total Allowable Catches (TACs).
- Accepting that to prevent overfishing and ensure sustainability, the methods required to support such TAC's need to be effectively monitored and regulated. This entails accurate registration of catches; and may include the use of technical measures in permitted gear.
- Actively supports and assists in gathering and sharing scientific data on the state of pelagic fish stocks; thus, securing the most detailed information available for use in the assessments necessary for sustainable fisheries management.
- Encouraging coastal States to agree management strategies for NE Atlantic pelagic stocks, which includes a comprehensive quota sharing mechanism.

The SPSG supports the work of the North Atlantic Pelagic Advocacy group, a supply chain collective formed in response to the dispute between Coastal States over international quota allocation of pelagic species in the North East Atlantic. The group has a common aim to source sustainable and certified seafood to supply a growing demand for traceable, eco-labelled fish products. NAPA uses its supply chain advocacy to call for secure and robustly managed pelagic stocks.

11. Scientific support

Successful and responsible fisheries management requires sound scientific advice and data. All fisheries stakeholders should ensure sufficient resources and facilities are available to provide a comprehensive foundation in order that necessary scientific research can be carried out. The Scottish pelagic industry fully supports scientific study to maintain and strengthen the future sustainability of the pelagic fisheries.

The Scottish pelagic industry focusses on two key actions to underpin data collection. To establish pelagic vessels as scientific research vessels and to work with onshore processing factories to promote the collection of scientific and biological data. Through the Scottish Pelagic Fishermen's Association, the SPSG employ a chief scientific officer and supports research to deliver these goals.

The industry actively cooperates and assists in this scientific vision to deliver the following objectives:

- Establish pelagic fishing vessels as research platforms, mapping changes in the abundance and distribution of pelagic fish in the areas they operate. Equip and train fishers in relevant methods to achieve this. The SPSG fleet undertake a programme of continuous self-sampling on all catches across all fisheries in which they operate.
 - E.g. Self-sampling, Co-sampling, Acoustic monitoring programmes, and the mackerel egg production survey.
- Work with fish factories and the supply chain to promote the collection of scientific biological data on pelagic fish.
 - E.g. Mackerel tagging, Fish fats as ecosystem indicators, Catch to batch project.
- Actively contribute to European and international developments of the science agenda influencing approaches to management of pelagic stocks.
 - E.g. ICES,
- Strengthen and promote collaborative science partnerships involving industry government and academia.
 - E.g. Guidelines for industry science, Training – Fishing into the Future

- Build awareness and understanding of the science concepts and issues relevant to the pelagic industry through engaging and informative media.
 - E.g. various communication channels
- Uphold scientific standards and always maintain scientific reputation.

This approach has built a close working relationship with the Science Division of the Scottish Marine Directorate on various projects and may lead to future studies with government, management and scientific programmes with international institutes. It has initiated projects with other co-funding partners including Fisheries Innovation and Sustainability, Shetland UHI and several other Scottish universities. The industry has Memorandums of Understanding established with both Cefas, Marine Directorate and Shetland UHI to deliver working science partnerships

Furthermore, the SPSG fleet undertakes to record any interactions during fishing activities and fishing trips with endangered threatened and protected (ETP) species. Concerns have been raised in some pelagic fisheries of interactions between cetaceans and fishing gear, the SPSG fleet has co-operated fully with cetacean observer programmes over many years with no observed bycatch incidents. It is currently supporting a new Sea Mammal Research Unit (SMRU) observer programme led by St Andrew's University,

As an additional measure of best practice vessels undertake to record any interactions, should they occur. Species included in this reporting scheme include whales, dolphins, porpoises, seabirds, and turtles. This approach will help support the CIBBRiNA EU project¹⁰, some objectives of this initiative is to greatly improve the reliability of bycatch estimates and further develop, test, and implement effective mitigation measures for the incidental bycatch of marine mammals, birds, turtles.

12. Monitoring and compliance

Stakeholder compliance with national and international management regimes is fundamental to the sustainable policy of the Scottish pelagic industry. The industry recognises that pelagic fisheries are most effectively managed through Total Allowable Catches (TACs) and quota systems and firmly believes that quotas must be respected to ensure the long-term health of pelagic stocks.

Effective monitoring of fishing activity is a core component of sustainable fisheries management. The primary objectives of any monitoring programme typically include:

- The collection of accurate data on catch, bycatch, protected species interactions, discards, and wider environmental indicators to inform management and stock assessment processes.
- Monitoring compliance with regulations governing the fishery; and
- Monitoring fishing activity and effort to improve understanding of how fisheries operate in practice.

Effective monitoring programmes support robust fisheries management and help to demonstrate that fishing activity is sustainable, responsible, and accountable. From March 2026, Scottish fisheries legislation mandates the use of Remote Electronic Monitoring (REM) technology on all pelagic vessels operating in Scottish waters, and this requirement also applies to Scottish pelagic vessels fishing in any waters. All SPSG vessels are fitted with fully operational REM systems that meet the specified technical standards and comply fully with the requirements of this legislation.

At-sea observers provide one means of collecting independent data and may contribute to reducing stakeholder conflicts, addressing concerns around over-exploitation, and improving understanding of fisheries operations. Where deployed, observer programmes should deliver outputs that contribute to the development of effective international management measures, promote good fishing practices, and support both stock and fishery sustainability. The Scottish pelagic industry supports the appropriate use of at-sea observers and will work collaboratively with scientific agencies and industry bodies to facilitate such programmes where deemed suitable.

The Scottish pelagic fleet has well-established working relationships with the Marine Directorate, the SMRU and the Scottish Fishermen's Federation. These partnerships support the delivery of agreed monitoring programmes under clearly defined protocols, ensuring that monitoring objectives are met effectively.

In Scotland, vessels may only land catches to buyers registered under the compliance regulations established by the Scottish Government. Registered buyers are required to maintain accurate records and must be available for inspection by Marine Scotland Compliance at any time. This framework, alongside existing controls on the catching sector, extends compliance measures throughout the supply chain. The Scottish pelagic industry considers this an essential mechanism for delivering comprehensive and consistent compliance with fisheries management regulations, while emphasising the importance of parity across all nations fishing pelagic stocks in the North-East Atlantic.

A pelagic inspection protocol governing inspection and monitoring procedures for pelagic processing facilities has been agreed between the Marine Directorate Compliance Division and the pelagic processing industry. This protocol is essential to ensuring confidence and transparency in the pelagic monitoring and compliance regime.

In addition, the Scottish pelagic fleet works closely with Food Standards Scotland and local authorities to ensure compliance with all applicable hygiene legislation.

13. Optimising selectivity to promote conservation

Pelagic fishing targets mid-water single species shoals so bycatch of non-target species is generally insignificant, and given fishing takes place in mid-water there is very little impact on the seabed.

Cetacean bycatch has not been an issue within Scottish pelagic fisheries. This has been verified by studies carried out by SMRU, initially under a voluntary agreement, and now covered under regulation. Within the framework of Scottish pelagic fisheries, the methods of fishing, the natural habitat and characteristics of the target species mean that incidental bycatch of other non-target marine species is extremely rare.⁹

The Scottish pelagic industry has, and will continue to consider, how best to operate a total catch policy to mitigate discarding issues through fleet-wide measures.

The SPSG fleet make every effort to prevent catches of mixed species, or poor size composition by undertaking accurate shoal identification. SPSG vessels operate a communication and move on policy in the event that they do encounter commercially undesirable shoals of fish. In this event communications are to be made to any Scottish or international vessels fishing in the area.

14. Conclusion

This *Sustainable Policy of the Scottish Pelagic Industry* sets out the current collective position of the industry and provides a clear statement of intent, outlining the overarching policy framework and standards of conduct. The Scottish pelagic industry is committed to ensuring that this policy is fully implemented across all direct and indirect activities related to the fishing, processing, and commercial use of Scottish pelagic resources.

The Scottish Pelagic Sustainability Group (SPSG) will review this policy at regular intervals and will ensure it remains fully accessible and transparent to industry stakeholders and wider society.

The SPSG welcomes feedback and constructive comment on the policy and will give due consideration to any relevant suggestions received. Amendments arising from such feedback will be incorporated and published as part of subsequent policy reviews.

To submit comments for review, please contact:

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