



**WWF** *for a living planet*

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**PE1386/F**

The Public Petitions Committee  
TG.01  
The Scottish Parliament  
Edinburgh  
EH99 1SP

2 February 2011

**Reference:** Petition PE1386

Dear Committee Members,

Thank you for giving WWF Scotland the opportunity to respond to the above-mentioned petition.

WWF is the world's leading independent environmental organisation that works in over 90 countries. It is a charity that has over 5 million supporters and which works with people and businesses to find solutions to a broad range of pressing environmental problems. WWF action in Scotland is undertaken by a small dedicated team that works closely with stakeholders throughout the nation.

Given the place and importance of the Scottish fishing industry, WWF Scotland has been taking an active part in the common endeavour to deliver best practice in the management of our fisheries. Ensuring that all Scottish fisheries, whatever the scale, are sustainable is the best way of securing long-term stability for coastal communities and economies.

WWF Scotland is a member of a number of consultative and management bodies that enable the organisation to promote policies and measures aimed at reducing by-catch and discards, preventing overfishing and minimising the impact of fishing on the marine environment. One of the instruments that help on all those fronts is the granting of the "sustainable fishery" certification. The world's leading certification and eco-labelling programme that delivers the most coveted label is the Marine Stewardship Council (MSC). The MSC was set up as an independent non-profit organisation to promote solutions to the problem of overfishing, following a joint WWF/Unilever initiative.

MSC certification is only granted if a number of biological, environmental and fisheries management criteria are met and regular checks are carried out to ensure that all the conditions attached to certification continue to be fulfilled. WWF Scotland, therefore, sees MSC certification as a strong driver towards restoring the health of depleted fish stocks and the protection of marine ecosystems while encouraging and enabling consumers to choose labelled products over non-labelled ones. For several years, the Scottish Government has been strongly encouraging fleets to go through MSC certification. WWF Scotland is calling on all political parties involved in the Holyrood election to include a commitment to working towards achieving certification for all Scottish fisheries by 2015.



President: HRH Princess Alexandra,  
the Hon Lady Ogilvy KG, GCVO  
Chair: Ed Smith  
Chief Executive: David Nussbaum  
Director: Dr Richard Dixon

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It is in this spirit that WWF supported the certification of the Torridon Creel fishery for Nephrops from the start.

This fishery operates in the wider context of the regulatory regime applicable to Scottish inshore fisheries. Much work has been done by successive Administrations to increase the participation of inshore players so as to bring management of inshore fisheries closer to those involved. Indeed, work is continuing in this direction and WWF welcomes moves that can allow the adoption of the best adapted measures for the fisheries concerned regardless of scale.

However, the concept of scale, whatever the fishing gear used, is crucial as it may determine the level of representation that a fishery may achieve, including in a decentralised consultative and/or management structure. This situation may well be as a result of unintended consequences in the set up of interest representation or in the way authority is delegated or retained at central level. However, the outcome will be the same in that the small-scale fishery concerned risks to have its interests overlooked and, as a result, be powerless to ensure that the benefits that, in the case of MSC certification, a certification scheme brings can be preserved from free-riders.

The case of the Torridon creel fishery illustrates such a danger whereby the environmental, economic and social benefits accrued from the measures taken under the certification scheme, are being undermined by the inability of the Torridon Nephrops Management Group to put a cap on access or to make it subject to the constraints attached to the MSC certification. It is imperative therefore that this situation be urgently addressed so that the stakeholders who are encouraged - by public authorities and NGOs alike - to seek MSC certification, be empowered to ensure that such label can be preserved and retained. If nothing is done, stakeholders involved in localised fisheries will be discouraged from seeking certification in the future in the knowledge that they will not be able to exclude free riders from undermining their efforts or those who still have the drive to go ahead regardless will always be at risk of seeing their efforts ruined. In either case, the sustainability of Scottish fisheries and coastal communities will be the losers.

WWF Scotland therefore calls on the Scottish Government to ensure that groups of stakeholders, who have obtained MSC certification for a given fishery, be in a position to require that potential entrants to the scheme abide by the conditions attached to the certification. Such a move is essential to the success of current and future certified fisheries in Scotland.

Yours faithfully,

Dr Richard Dixon  
Director  
WWF Scotland