



11 Proposed Joint UK Fisheries Management Plans for Demersal Fish Stocks

March 2026

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Marine Group.

Response

26. Do you have any other additional comments on the 11 proposed demersal FMPs?

The 11 proposed demersal FMPs represent a significant opportunity to move from high-level policy intent to practical, ecosystem-based fisheries management. However, it is LINK's view that in their current form, these FMPs would not achieve that, and a number of common issues arise across the suite of draft plans that limit their effectiveness. As such, these comments apply to all 11 draft FMPs in this consultation.

Across the demersal FMPs, there is a consistent tension between whether these documents are intended to drive change or simply signpost existing or parallel processes. LINK's view is that FMPs must clearly dictate the actions required to deliver against the UK Fisheries Act (2020) objectives, rather than primarily describe work that is already underway or deferred to other policy mechanisms. Many of the proposed actions also rely on further research, future consideration or alignment with parallel processes, rather than setting out clear, measurable, enforceable measures that will be delivered through these FMPs.

LINK welcomes the inclusion of policies within the FMPs that recognise environmental impacts beyond stock sustainability, particularly those relating to bycatch, seabed impacts, marine protected areas (MPAs), monitoring and climate change. However, our primary concern is that ecosystem-based management is clearly not embedded as the overarching framework through which these policies are designed and delivered. Policies are presented largely as discrete themes, rather than as components



of an integrated ecosystem approach that explicitly considers cumulative pressures, ecosystem structure and function, and environmental limits.

While policies acknowledge seabed impacts, species interactions and marine protected area (MPA) objectives to an extent, they do not collectively articulate how fishing pressure will be kept within environmental thresholds consistent with achieving Good Environmental Status (GES) under the UK Marine Strategy Regulations. The policies do not clearly link individual objectives to GES descriptors (particularly D1, D3, D4, D6 and D10). While the draft FMPs broadly acknowledge that fisheries using mobile demersal gear pose risks to seafloor integrity and Priority Marine Features (PMFs), the proposed actions largely focus on improving evidence and understanding, rather than committing to spatial or effort-based measures to reduce seabed abrasion. They also push much of the accountability for spatial management back to MPA fisheries measures, many of which are still not being delivered with the consultation for inshore MPA management recently delayed again, and the recently adopted offshore MPA fisheries management measures do not all meet the conservation advice provided by JNCC.

In their current form, the draft FMPs rely on weak or non-committal language (e.g. “consider”, “support”, “encourage”), which does not provide assurance that outcomes will be delivered. Without clearer commitments, FMPs are more descriptive than actual operational tools to deliver the objectives of the UK Fisheries Act and enable recovery of declining fish populations. This is particularly frustrating in the draft FMPs for highly depleted stocks, such as cod. The Atlantic (Rockall) Cod FMP Policy 1 (“Continue to manage the Rockall cod stock using existing tools to maintain stock levels”) does not go far enough. ICES advice for the Northern Shelf stock indicates that even with current measures the stock is not recovering, necessitating additional management measures to tackle the pressures preventing population increase. There is clearly a need to recover (rather than maintain) cod population levels across all stocks, both as commercial stocks and as ecosystem components. Cod is a PMF and an important mesopredator, and there is significant evidence around how removal of cod from different areas in the Northeast Atlantic, including the Clyde, has contributed to a shifting trophic system and negative knock-on ecosystem effects.

LINK members note that the draft FMPs do not adequately account for species’ life history characteristics, such as long-lived, slow-growing demersal species that are particularly vulnerable to over-exploitation. For example, Northern Shelf Anglerfish have such a life history, not reaching sexual maturity until around 70cm in length, meaning populations are inherently less resilient to fishing pressure and slow to recover from depletion. Fisheries management and wider policy frameworks (such as the UK Marine Strategy Regulations) require management to reflect species’ biological limits and support long-term ecosystem resilience. We would expect the final FMPs to explicitly demonstrate how life-history information is used to inform precautionary harvest strategies, size-based protections and recovery measures for species with these traits, in order to ensure coherence with the Fisheries Act objectives (namely the Sustainability, Precautionary, Ecosystem and Scientific evidence objectives) and avoid undermining long-term stock sustainability. This issue loops back to the previous comments on indicators of GES (e.g. seafloor integrity) and protection of PMF habitats, as different life history



Scottish Environment LINK the voice for Scotland's environment



Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899



stages require protection of critical habitats (e.g. spawning habitat, refuge areas for juvenile fish), many of which may also be regionally or locally specific (e.g. site fidelity to spawning areas).

LINK members recognise that fisheries policy operates within a complex governance and international context. However, the absence of any indicative timelines or sequencing across the demersal FMPs creates uncertainty and weakens accountability. LINK members would like to see FMPs:

- Set out clear implementation pathways;
- Distinguish between short, medium and longer term actions;
- Clarify which actions are pre-requisites for others (e.g. monitoring before spatial management).

This is particularly important for actions relating to bycatch reduction, mitigation of seabed impact and improvements in monitoring and compliance. There seems to be a lack of urgency on these aspects, despite known environmental risks. Crucially, Remote Electronic Monitoring systems (with cameras) should be rolled out across the Scottish fishing fleet as a priority to ensure transparent and robust monitoring.

Across the draft demersal FMPs language relating to TAC-setting, MSY and sustainability outcomes is ambiguous. While alignment with MSY is frequently stated, there is insufficient clarity on:

- How and when management will demonstrably move stocks towards or maintain them at or above MSY;
- How environmental considerations beyond stock biomass are incorporated into TAC advice;
- How progress will be measured over time.

A consistent theme across the draft demersal FMPs is the gap recognising ecosystem impacts and committing to measures to reduce them. While bycatch, seabed damage and impacts on sensitive species and habitats are acknowledged, actions are often framed around further evidence gathering rather than management intervention.

To deliver GES for seabed integrity and biodiversity, and to be consistent with the Fisheries Act objectives, FMPs need:

- Clear pathways to reduce seabed abrasion from mobile demersal gear;
- Time bound plans for addressing bycatch risks;
- Explicit links to UK Marine Strategy descriptors and environmental thresholds.

Clarity on these elements is needed to ensure that environmental pressures are meaningfully reduced rather than simply monitored. LINK members acknowledge that the parallel process for establishing fisheries management measures in inshore MPAs and for PMFs outside MPAs is intended to help fill these gaps, but additional targeted measures will be needed for fish species PMFs and the essential fish habitats on which they rely.

Actions for all the draft FMPs should go beyond data collection and explicitly commit to:



Scottish Environment LINK the voice for Scotland's environment



Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899



- Spatial management measures in ecologically sensitive areas, including MPAs and areas supporting PMFs;
- Clear threshold or caps on benthic pressure linked to environmental objectives.

Where identified as a risk, the draft FMPs recognise bycatch risks to non-target fish, seabirds, and marine mammals, but lacks quantified bycatch limits, species-specific mitigation pathways or clear timelines for implementation. Actions such as “exploring gear options” or “supporting trials” do not provide sufficient assurance that risks will be reduced at the scale or pace required.

To be clear, LINK’s position is:

- Bycatch mitigation actions should be specific, time bound and measurable
- Monitoring tools such as REM should be mandated on all vessels, rather than optional, so ensure credible data on bycatch and discards.
- Gear selectivity should be required where available and identified as high bycatch risk (e.g. Whiting taken in Nephrops trawl fisheries can have high discard rates (up to 80%, Marine Conservation Society Good Fish Guide)).

The proposed actions on monitoring and data collection are welcome in principle but repeat the key weakness that is the absence of clear compliance mechanisms or legal underpinning for tools such as REM and spatial monitoring. Without mandatory update and transparent reporting, improvements in environmental performance cannot be assured.

Climate change is recognised as a pressure in the draft FMPs, but is not embedded across policies as a cross-cutting driver of management decisions. The policies and actions in the draft FMPs should be clear on how consideration of climate change impacts are operationalised, specifically around how climate-driven changes in stock distribution, ecosystem interactions or cumulative pressures will be incorporated into harvest strategies or spatial management decisions.

Several of the draft FMPs refer to actions such as “consider enhancing socio-economic data”. LINK members support improved socio-economic understanding, but again this language is weak and non-committal. Socio-economic evidence should be clearly linked to how it will inform management decisions and how it delivers the relevant Fisheries Act Objectives. There needs to be clarity on how management actions and improved environmental health will translate to socio-economic benefits for sustainable fishing businesses, and a clear pathway for a just transition for the fleet.





This response was compiled on behalf of LINK Marine Group and is supported by: Marine Conservation Society, National Trust for Scotland, Scottish Seabird Centre, Scottish Wildlife Trust, Young Sea Changers Scotland.

For further information contact:

Esther Brooker, Senior Marine Advocacy Officer

esther@scotlink.org



Scottish Environment LINK the voice for Scotland's environment

Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899

