

Marine Stewardship Council

## Thames up or thumbs down?

The certification of the Thames-Blackwater herring drift-net fishery of the UK by the Marine Stewardship Council has been far from rigorous

On 5 September 2000, the Marine Stewardship Council (MSC) certified the Alaska salmon fishery as sustainable and thus eligible to carry the MSC label. This is the third such certification, following those for Western Australian rock lobster and the Thames-Blackwater herring drift-net fishery in the UK.

This decision by the MSC piqued my curiosity, for, like many in the fisheries world, I had been watching developments with interest. I decided to look into one of these in more detail, choosing the herring fishery, as it is relatively small and close to where I live. On the MSC website ([www.msc.org](http://www.msc.org)), I found a document entitled *Fisheries Certification-Public Summary Report*, dated 1 July 1999.

The paper explains that the Thames-Blackwater herring is a small but unique stock of spring-spawning herring, which is fished in the Greater Thames Estuary. Following the decline of the North Sea herring stock, increased effort was exerted on the stock, with catches peaking at 606 tonnes in the 1972-73 season. The fishery had to be closed in the winter of 1979-80, but was reopened some time after 1981.

It is an extremely small fishery, with recent total allowable catches (TACs) of 131 tonnes (1998) and 128 tonnes (1999). The MSC certification is for the fish taken by small drift-nets, mostly less than 10 m, though the stock is also fished by Belgian- and French-flagged pair trawlers operating immediately to the south of the Drift-net Regulatory Area. Various controls, such as time and area closures, have been implemented.

As I read the rest of the report, discussing a series of other aspects of the fishery, a

few points struck me as noteworthy. The Public Summary Report states:

*During hauling it was observed that gilled fish were within a narrow range of sizes; specimens that were significantly larger or smaller than this narrow size-class range were dropped from the net and those alive swam away as the net was lifted from the water. The gear employed appears to be size-selective. [Section 2.1]*

*No documentation exists on by-catch and discards. For the operation that was observed, by-catch was limited to 12 fish for three fleets [about 1200 m] of drift-nets fished over the course of four hours, with a total of 80 stone [509 kg] of herring taken. Of these, eight were pouting, two were whiting and two were codling. All were discarded to sea. [Section 2.2]*

The anecdotal observations described above do not constitute a proper analysis of gear selectivity and discards—this would require a scientifically designed programme of observation of species composition, measurement of length frequencies, etc. The report does not even state what was the “narrow size-class range”, nor does it mention when the observations were made nor how many vessels were sampled; by-catch is known to vary widely from place to place and season to season. The scientific authority, CEFAS, does conduct sampling of length frequencies, but these seem not to have been used in the certification.

### No logbook

*Since most of the herring drift-netters are less than 10 m, they are not required to submit a formal logbook. However, they are required, as a drift-net licence condition, to submit simple catch forms to the local MAFF officer. The form provides details of the vessel and skipper, and an estimate of the landed catch of Thames*

*estuary and Southern North Sea herring. No cross-correlation of landings data is undertaken. All landings are estimates, since no physical weighing is conducted, and, in fact, the scales at West Mersea [ a major landing site] were inoperable at the time of visit. [Section 2.3]*

**R**eliable catch data are of fundamental importance to stock assessment and, therefore, fishery management. The approach described here is rather casual, with no verification of landings, so it is difficult to know how reliable are the data provided by the fishermen.

At present, the TAC consists of the total catch recommended for Thames herring plus a small amount of North Sea (Downs) herring. It is set solely to conserve the stock. No technical document was available of the stock assessment. Effort is not directly recorded, and by-catch and discards are not recorded at all. [Section 3.2]

With no technical document to explain the assessment, it is impossible to verify its reliability. This is compounded by the problem of the quality of landings data.

Although the stock assessment takes full account of all catches from the previous year of this stock, Thames Estuary herring caught outside the drift-net box, by the mid-water pair trawling fleet off the Kent coast, are not counted against the TAC as the season progresses. In the 1997/8 season, 50 per cent of the catch was taken outside the regulated area.

Once the TAC is met, the drift-net fishery is closed. However, because the TAC does not cover all the catch from this stock, the TAC alone cannot guarantee to limit fishing mortality to the required level. [Section 3.2]

The fact that all catches are not counted against the TAC is a very serious problem. Although the report notes that there is little demand for the fish at present, were demand to increase due to the MSC label, the situation as described here could result in double the TAC being taken before it is realized. As effort is neither controlled nor directly recorded, it is, at present, impossible to control the fishery by that

means either. Other sections of the report describe monitoring and control, social and environmental impacts of the fishery, ghost fishing and other aspects. The report then summarizes all of the above information and lists a series of strengths and weaknesses of the fishery.

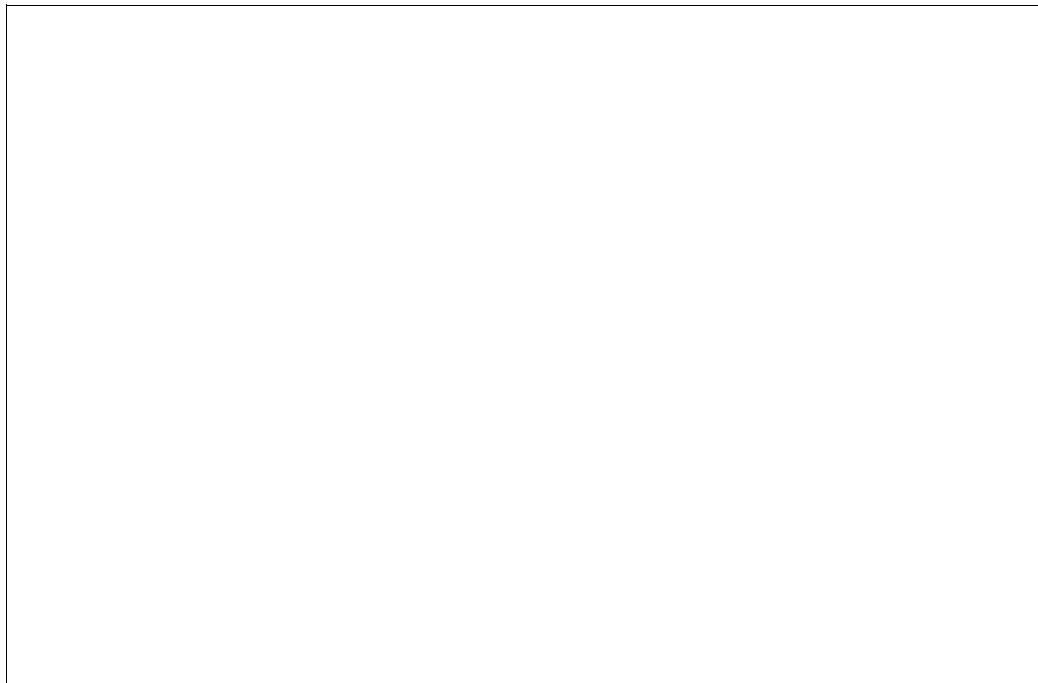
Among the aspects of the fishery which I have included in this note, the following are considered by the MSC to be strengths:

- the stock assessment is extensive, given the small size of the fishery, and the data appear to be good, even though dependent upon voluntary contribution by fishermen;
- the TAC is based securely on the scientific assessment and appears well-enforced;
- the fishing method appears highly selective, with small by-catch and discards;
- the Herring Management Committee provides an important forum for co-management.

Nonetheless, information contained in the report directly contradicts some of these perceived 'strengths', as I have shown above.

The weaknesses, according to the report, are as follows:

- the TAC does not cover catches of the stock outside the regulated area;
- the stock survey conducted for the assessment could be at the wrong time, adversely affecting its reliability;
- no cross-checking of data is conducted to verify landings;
- by-catch and discards are not recorded, and effort data are weak;
- the fishery is essentially open-access, as there is no legal limit to the number of vessels permitted to fish; and



- while the stock assessment is probably adequate, given the small size of the fishery, the lack of technical documentation is problematic.

The following were seen as “potential problems, but not currently a hurdle to certification:”

- the management and administration of the fishery is subsidized;
- no account is taken of the socioeconomic situation when the TAC is decided; and
- not all catches are properly recorded.

As a result of these weaknesses, six Minor Corrective Action Requests (CAR) were issued, which must be acted upon by 1 October 2001. One Major CAR was issued, relating to the inability of the Ministry of Agriculture, Fisheries and Food to effectively close the fishery when the TAC is reached, as catches by the pair trawlers outside the Driftnet Regulatory Area are not counted against the TAC during the season. The Kent and Essex Sea Fisheries Committee was then to develop a two-year programme to correct this, by 1 October 2001. The Report concludes that “*the outstanding Minor Corrective Action Requests do not preclude certification*” and

the fishery has been certified to carry the MSC logo for a period of five years from 3 March 2000.

The MSC considers this to be a well-managed fishery, which fulfills the Principles and Criteria for Sustainable Fishery (which can be downloaded from [www.msc.org](http://www.msc.org)). As I read through the documents that have been posted, I was, however, struck by a number of what I can only describe as shortcomings in the management of the fishery (unverified landing data, no by-catch data, no formal management plan, no technical report on the stock assessment, etc.). The report makes reference to further information available elsewhere, such as a technical description of the method used for the stock assessment (but not the stock assessment itself) or a fuller report of the MSC assessment. In the interests of transparency, though, any essential information on the fishery, and the reasons for the MSC accreditation, should be contained in the Public Summary Report posted on the web. Additional information could elaborate upon, but not fundamentally change, the MSC assessment.

#### **One of the first**

As the Thames-Blackwater herring fishery was one of the first to be certified by the MSC, I would have expected their examination to be extremely rigorous, so as to establish strict and commendable

precedents. This is especially so for such a small fishery which should be easier to manage.

**N**ow, though, other fisheries seeking certification can reasonably ask why they should produce verified landings data, a technical stock assessment report or information on by-catch and discards when one fishery without them has already been approved. Should further information on this fishery become publicly available, I would be only too pleased to consider it. ♣

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