



In response to the DEFRA **Consultation on Managing Quota in 2023 and Beyond**

The above organisations namely, the UK Bluefin Tuna Association, The Angling Trust, the Shark Angling Club of Great Britain, the Sportfishing Club of the British Isles, Angling Cymru, the Professional Boatman's Association, and Marine Conservation Northern Ireland submit this note in support of the summary responses provided in the online consultation platform.

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## **Summary.**

The organisations highlighted above have been working alongside DEFRA, CEFAS, MMO, IFCA Natural England and a range of Devolved Administration authorities for several years now developing thinking around policy and management strategy for Atlantic bluefin tuna in UK waters following their seasonal presence that began in 2015/2016 after an absence of around sixty years.

The UKBFTA, AT, PBA, SACGB and SCBI were the primary instigators of and contributors to the design and establishment of the highly successful English CHART programme in 2021. Subsequently Angling Cymru and representatives from MCNI have worked with the UKBFTA to deliver CHART programmes in both Wales and Northern Ireland for 2022.

We are collectively of the view that the arguments for the establishment of a recreational catch and release fishery for Atlantic bluefin tuna in UK waters are extremely compelling. Such fisheries operate in 13 other quota holding member states of the International Commission for the Conservation of Atlantic Tunas, (ICCAT), and with a world class fishery on our doorstep we see no reason why a licensed, sustainable, economically and scientifically valuable fishery should not be established here.

Such a fishery requires an allocation of part of the UK's existing 48.4t Total Allowable Catch (TAC) of Atlantic bluefin tuna. Such fisheries have been shown to generate significant socio-economic benefits that are multiples that of the commercial use of that quota on a per tonne basis. Those benefits are spread widely across coastal communities, much of that outside of the regular 'tourist season'.

As per the requirements of ICCAT, access to such a fishery would be managed by a

licensing system, and subject to monitoring and reporting obligations. We believe such a fishery could easily meet ICCAT requirements as well as objectives set out in the Fisheries Act such as sustainability, along with ensuring optimal use of a natural capital asset.

We are of the view that the future management strategy for Atlantic bluefin tuna in UK waters from 2023 onwards should incorporate a world class Catch and Release Recreational Fishery, (CRRF).

We will detail further below our arguments for the use of Quota to establish such a fishery.

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## **Sustainability:**

### **Stocks:**

By the early 2000s multiple indicators highlighted a dramatic decline in the Stock Spawning Biomass (SSB) of Atlantic bluefin over the previous 20-30 years. In 2007 ICCAT instigated a 15 year recovery plan for 'Eastern Atlantic bluefin tuna', (E-BFT). The result has been one of the greatest conservation success stories of this century.

Whilst there is some uncertainty regarding the precise extent of the recovery in stocks, that uncertainty effectively amounts to whether stocks have multiplied by a factor of 3, 4 or 5 from the lows of the early 2000s. This was highlighted in the latest (2020) ICCAT stock assessment<sup>i</sup> and continues a trend seen in the 2014, and 2017 assessments.

The recovery is irrefutable and has been acknowledged by various Conservation bodies including the WWF and Pew Charitable Trust.

The TAC for E-BFT has been increased from c11,000t in 2011 to 36,000t in 2020 in response to this recovery. After expressing concern in 2017 re the proposed increase in E-BFT TAC from 24,000 to 36,000t between 2018 and 2020, those two bodies did not object to the maintenance of the 36,000t level for 2021 and 2022.

### **Status:**

In 2011, following several decades of sharp declines in their SSB, the International Union for the Conservation of Nature, (IUCN) declared Atlantic bluefin, on a Global level to be 'Endangered', the mid point in their three 'threatened' categories of 'Critically Endangered', 'Endangered' and 'Vulnerable'.

The stock improvement following the recovery plan was acknowledged by the IUCN in 2015 when upon review they declared the 'European' stock, (over 80%, possibly over 90% of the global stock), to be 'Near Threatened',<sup>ii</sup> below the three 'threatened categories'.

In 2021 the IUCN acknowledged the extent of the further recovery in revising the global status by three steps from 'Endangered', to 'Least Concern'<sup>iii</sup>. 'Least Concern' is the lowest level ranking the IUCN apply when data are available.

### **Catch and Release Mortality:**

ICCAT require that Incidental Mortalities associated with such fisheries are recorded and set aside against that member's allocated quota.

The English CHART programme in 2021, along with other studies and fisheries have illustrated that such fisheries, when well designed and managed can achieve very low mortality rates, both incidental and post release.

Canada incorporates a 3.6% mortality rate into Catch and Release fishery estimates, and Denmark incorporated a 4.35% estimate in its recent study of the 2018-2020 research fishery. The Incidental Mortality rate experienced in the 2021 English CHART programme was substantially lower than both of these estimates.

### **Scale of the fishery:**

Whilst we should strive for the best mortality rates in any recreational fishery, we would point out that the absolute scale of any UK C+R fishery would be miniscule in its impact upon the status of the stock.

Should such a fishery fully utilise the 20t of UK TAC we believe it should have allocated to it, that 20t represents just 0.056 of a percent of the E-BFT 36,000 TAC. It is less than a rounding error in terms of its impact upon the global stocks of Atlantic bluefin tuna.

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### **Socio-Economic benefits.**

Atlantic bluefin tuna represent not only an iconic species, but to use the UK Government's terminology, a valuable 'Natural Capital Asset'.

The UK's 48.4t Total Allowable Catch (TAC) should be utilised in a way that provides the optimal economic return whilst meeting the UK's objectives to operate sustainable, world class fisheries.

There are a number of studies that illustrate the absolute economic potential of such fisheries, and the relative value versus the Commercial use of that asset in a catch and kill fishery.

#### **Canada:**

The 2014 Ecology Action Centre study, 'Reeling in Revenue'<sup>iv</sup> suggested that their recreational catch and release bluefin fishery generated at least six times per tonne that of their commercial fishery, brought a 'tourism dividend' to the ports operating the fishery, and spread benefits widely across the community.

#### **Hatteras, North Carolina, United States:**

A study<sup>v</sup> undertaken in 1997, just several years after a recreational winter bluefin fishery emerged off that coastline highlighted the extent of the revenue it generated and just how widely it was spread across communities.

#### **Denmark:**

A study published only last month by the Danish technical University<sup>vi</sup> into their own 'research fishery' for bluefin operated between 2018-2020 found values being ascribed per tonne that were once again multiples of what a commercial fishery could generate, in their case claiming a value per tonne of TAC of around Eur1.6 million.

#### **England:**

The socio-economic survey of anglers in the English CHART 2021<sup>vii</sup> programme indicated a total economic impact from the small scale (15 vessel) programme of £889,000. Given the TAC utilisation (from incidental mortality) of around 1.3t this equates to almost

£700,000/tonne, or £89,000 for each of the ten bluefin mortalities incurred, and also indicated that over 80% of that revenue generation was directly and exclusively attributable to the programme.

(Note that the English CHART figures quoted do not include the expenditure of charter vessels equipping for the programme, their mooring fees etc which may be one factor in explaining the numbers being lower than that recorded in the Danish programme).

CHART 2021 showed that demand for such fishing exists, with the number of trips undertaken exceeding the estimates of programme designers by a factor of two.

It is our considered view that since 2015/16 the UK hosts in its waters what is potentially one of the top recreational bluefin tuna fishery destinations in the world. The abundance of fish and extended season, (up to six months of the year) suggest it is reasonable to assume that demand from both UK and international anglers would be substantial in a fully fledged catch and release fishery that could invest and plan ahead unlike the expensive to operate, limited year to year CHART programmes.

That such recreational catch and release bluefin fisheries can generate substantial economic benefits across wide sections of coastal communities outside of the 'tourist season' is irrefutable.

The establishment and development of such a fishery is consistent with various government policy objectives, including;

Improving the economic prospects for coastal communities<sup>viii</sup>,

DCMS 'Tourism Recovery Plan June 2021'<sup>ix</sup>,

Enabling a Natural Capital Approach<sup>x</sup>

Levelling up the United Kingdom<sup>xi</sup>

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### **Scientifically valuable.**

The operation of a licensed, monitored bluefin CRRF would require participants to collect data on captures, (including date, location and size), as well as report mortality levels. Such reporting would provide insight into the temporal and spatial distribution of bluefin across the UK's waters, and over time insights into the evolution of the health of stocks.

The use of such a fishing platform for additional, voluntary scientific research could contribute further not just to our understanding of the bluefin themselves, but also the habitat they occupy and species they interact with.

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### **Regulatory control and oversight.**

A recreational bluefin fishery would be required under ICCAT regulations to control access to the fishery, (typically via a form of licensing), and to monitor and report on the operation of that fishery. It would be the antithesis of the 'free for all' that some fear.

Such a fishery would allow stakeholders to feel they had a genuine stake in the future of that fishery and could mitigate unauthorised fishing and contribute to a greater understanding of and commitment to a sustainable future for bluefin, and the health of the marine environment more generally.

Equitable access argues for a fishery that allows access to both professional charter vessels as well as private recreational vessels. The Danish/Swedish research programmes (and the DtU study on economic benefits) have highlighted the additional value that can be generated by the inclusion of private recreational vessels in a licensed, managed fishery.

It would also be consistent with multiple objectives of the Fisheries Act including the recognition of recreational anglers as legitimate stakeholders in fisheries and fisheries management

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## **In Conclusion.**

The UK has a blank sheet of paper when it comes to the management of Atlantic bluefin tuna.

We have an opportunity to show that there is a different model to predominantly commercial exploitation of these stocks. A model that is sustainable, economically and scientifically valuable, and sets a new benchmark in the management of this iconic species.

A world class catch and release recreational fishery would fulfil all of those objectives.

The allocation of circa 20t of the UK's ABFT TAC would permit the operation of that fishery and should be a priority in the utilisation of the UK's TAC in any management strategy adopted for 2023 and beyond.

Yours faithfully

The UK Bluefin Tuna Association  
The Angling Trust  
The Shark Angling Club of Great Britain  
The Sportfishing Club of the British Isles  
Angling Cymru  
The Professional Boatman's Association  
Marine Conservation Northern Ireland

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<sup>i</sup> ICCAT '2020 SCRS advice to the Commission', 'SCRS\_2020\_Advice\_Eng.pdf'

<sup>ii</sup> <https://www.iucnredlist.org/species/21860/97778482>

<sup>iii</sup> <https://www.iucnredlist.org/species/21860/46913402>

<sup>iv</sup> <https://ecologyaction.ca/issue-area/reeling-revenue>

<sup>v</sup> <https://orbit.dtu.dk/en/publications/economic-expenditures-by-recreational-anglers-in-a-recovering-atl>

<sup>vi</sup> This data has yet to be published by DEFRA/CEFAS but has been presented to the 'CHART Steering Group' and cleared for inclusion in this submission.

<sup>vii</sup> 'The Economic Impacts of the Recreational Bluefin Tuna Fishery in Hatteras, North Carolina'

<sup>viii</sup> <https://www.gov.uk/government/collections/coastal-communities>

<sup>ix</sup> Department for Digital, Culture, Media and Sport: 'The Tourism Recovery Plan', June 2021.

<sup>x</sup> <https://www.gov.uk/government/publications/enabling-a-natural-capital-approach-enca-guidance/enabling-a-natural-capital-approach-guidance>

<sup>xi</sup> <https://www.gov.uk/government/publications/levelling-up-the-united-kingdom>