



World Cetacean Alliance
Unit D, 132-34 Albion Street,
Southwick, Brighton, BN42 4DP,
UK

Registered charity: 1160484

2 May 2023

Dear [MP name],

Time to enforce UK legislation on bycatch

We are writing to urge you to take action regarding the hundreds of dolphins that are killed every year as the result of pelagic supertrawlers fishing in waters around the UK.

You may have already heard of 'supertrawlers': huge fishing vessels with nets up to a kilometre long. Dolphins and other marine wildlife are unable to escape these supersized nets and end up being needlessly and cruelly killed as bycatch.

More than 130,000 people share our concerns about supertrawler bycatch and have [signed our petition](#) calling for greater transparency and accountability to tackle the threat, including 105,378 signatures from the UK.

Sadly, we have seen first-hand evidence of this issue in Sussex. The World Cetacean Alliance's sister organisation, the Sussex Dolphin Project, recorded 17 dead cetaceans on local beaches in 2020, during the five-month period that supertrawlers were fishing in the channel off the Sussex coast. This is compared to just two for the rest of the year when there was no supertrawler activity. Since only 10% of bodies wash up on shore¹, we estimate the true figure to be closer to 170 bycatch-related deaths in Sussex alone. This is a trend that we have seen continue year on year.

Since November 2021, all vessels licensed to fish in UK waters are legally required to report marine mammal bycatch to the Marine Management Organisation (MMO). However, after submitting multiple Freedom Of Information requests asking for data on cetacean bycatch from supertrawlers in the UK's Exclusive Economic Zone (EEZ), we were told by the MMO that no such information exists. This means that the UK's legislation is not working, and nobody is being held to account while dolphins and other marine animals continue to lose their lives.

As confirmed recently, the vast majority of cetacean bycatch in the UK is underreported². Without proper enforcement, mandatory reporting for supertrawlers is no more effective than voluntary self-reporting and the true scale of the issue will continue to be hidden.

1: "10% of bycaught dolphins end up stranded", [source: IFAW](#).

2: 'UK fishing vessels 'underreporting' whale, dolphin and porpoise bycatch', [source: The Guardian](#).

How can we address this threat?

Under the objectives established by the Fisheries Act 2020, the UK has a legal duty to support a healthy marine environment, as well as minimising and (where possible) eliminating incidental catch of sensitive species³. Our view is that indiscriminate, destructive and poorly monitored supertrawler activity is in direct conflict with these objectives.

According to the Minister of State at the Department for Environment, Food and Rural Affairs (Defra), the government is currently considering their policies for supertrawlers⁴, providing a valuable opportunity to address this issue.

We are urging the government to hold supertrawlers to account, starting by requiring all fishing vessels over 95m in length, operating within the UK's EEZ, to use Remote Electronic Monitoring (REM) as part of licensing conditions for access to UK waters.

Remote Electronic Monitoring (REM)

Regulation (EU) 2019/1241⁵ provides the framework for technical measures (such as REM) to be used to help minimise and eliminate bycatch in UK waters.

REM is a reliable and cost-effective tool that is already used by many other nations to improve data collection, transparency, and fisheries management, and has been recommended as the best method for monitoring larger, pelagic vessels⁶.

In order to be effective as a bycatch reporting and mitigation tool, REM should be accessible to the MMO and include video monitoring of:

- the net mouth being opened (since large, bycaught animals often fall out of nets as they are hauled or are removed before the nets are landed); and
- the net and catch being brought on board.

3: Fisheries objectives, particularly the "ecosystem objective", [source: The Fisheries Act 2020](#).

4: Response to a parliamentary question on regulation of pelagic supertrawlers, [source: UK Parliament](#).

5: [Regulation \(EU\) 2019/1241](#) is retained EU legislation (amended by [the Common Fisheries Policy and Animals \(Amendment etc.\) \(EU Exit\) Regulations 2019/1312](#)) on the conservation of fisheries resources and the protection of marine ecosystems through technical measures.

6: *Monitoring Cetacean Bycatch: An Analysis of Different Methods Aboard Commercial Fishing Vessels - ASCOBANS Technical Series No.1*, [source: ASCOBANS report](#).



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The bigger picture

The data collected by REM will shine a much-needed light on this problem, which we believe should ultimately support a permanent ban on supertrawlers accessing UK waters (similar to that enacted by Australia in 2019⁷) to uphold the government's responsibility to protect the marine environment and mitigate bycatch.

What can you do to help?

As you will be aware, the protection of animals from suffering is a topic that many of your constituents care deeply about, and there will undoubtedly be strong public support for the prevention of the deadly problem of bycatch.

We are asking MPs to **table a written question in the House of Commons, requesting a response from Defra** on topics such as:

- how they are ensuring that supertrawlers fishing in UK waters are fulfilling their legal duty to report marine mammal bycatch to the MMO
- whether the government will introduce REM of bycatch as part of licensing conditions for supertrawlers to access UK waters.

Alternatively, we would encourage MPs to **write a letter to the Secretary of State for Environment, Food and Rural Affairs** to express concern about supertrawler bycatch and seek clarity on what monitoring requirements the MMO currently has in place, whether they are considering the introduction of REM as a licensing condition, etc.

We are happy to provide support in drafting content, so please get in touch at campaigns@worldcetaceanalliance.org if you would be willing to table a written question or send a letter to the Defra Secretary.

Yours sincerely,

Harry Eckman
CEO, World Cetacean Alliance

On behalf of:

The World Cetacean Alliance

Sussex Dolphin Project

⁷: 'Supertrawlers to be banned permanently from Australian waters', [source: The Guardian](#).



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