

## Scottish Sea Angling Conversation Network



31/10/2010

### SSACN response to the

#### **Renewal of the Tope Order (Prohibition of Fishing) Order 2008 SI Number 2008/691**

The Scottish Sea Angling Conservation Network is pleased to be offered the opportunity to comment on the review of the Tope Order (Prohibition of Fishing) Order 2008 SI Number 2008/691

We feel it is crucial that the SI is renewed in its present form as despite the order, anecdotal evidence from the charter fleet suggests tope numbers are diminishing in some areas and particularly Scotland, Ireland, Thames and around the channel Isles.

We would also like to see the UK pressing for more controls across the EU. A high number of our tag recaptures are by French and Spanish longliners in the Bay of Biscay and the Azores. Many of these landings are still listed as sharks so we find it impossible to get an accurate picture of the landings. This needs addressing immediately.

SSACN believes an Eu TAC on tope landings is crucial as we fear the tope could end up in a spurdog style recovery programme. We urge that the EU adopts the principles of the CPOA by adopting the precautionary approach to tope management.

The fisheries minister at the time of the SI, John Shaw wrote

*"I realise that this order is a unilateral measure and does not apply to other Member State's vessels. However I believe the European shark Plan of Action currently being drafted by the European commission will provide an opportunity to co-ordinate management measures such as these and research undertaken by Member States in order to protect vulnerable shark species and I will be working with my officials to ensure that it does so"*

Sadly this doesn't have appeared to have happened with the focus perhaps being placed on spurdog and porbeagle. We are aware that Ceefas are engaging in research on the spurs and porbeagles and suggest this should be extended to look at tope populations.

The Scottish Government carried out an economic study on the value of RSA. This shows that the recreational tope fishing is worth millions to the local economy of Dumfries and Galloway and there is no doubt if tope populations continue to decline then there will be job losses in the charter and tackle trade as well as accommodation/tourism. The numbers in Scotland have reduced by at least 75% in the last three years and SSACN would also like pressure applied to Scotland to match the English SI. As these fish migrate through English waters it is crucial the SI is renewed in its present form. It is difficult for us to campaign on a European level when Scotland has no intention of protecting the tope.

SSACN set up the Scottish Shark Tagging Programme last year and we have a volunteer army of over 200 anglers See [www.tagsharks.com](http://www.tagsharks.com) Our codes of practise have been adopted by many angler organisations and have recently been translated into Dutch

We believe by encouraging anglers to join the programme they will adhere to the codes of practice, rig design etc. which should ensure a successful return of the tope.

We thanked Defra at the time for their bold move in protecting the tope shark and hope the renewal will go through accordingly.

Ian Burrett

Projects director