

2nd December 2024

For the joint attention of:

European Commission

UK Government Department of Environment, Food and Rural Affairs

UK EU Spurdog Position Paper

North-east Atlantic Spurdog – a missed opportunity

The context

Following a closure of over 15 years, the Northeast Atlantic spurdog stock has grown to a large size and “can support a significant level of landings” from 2023 onwards.¹

The opening of spurdog landings in 2023 failed to create social and economic value whilst causing high levels of dead discarding.

The UK and EU fishing industry highlights the unrealised opportunity that this fishery presents to:

- create a market contributing to food security and the increased uptake of healthy, low-carbon, locally produced food.
- provide alternative income for fishers in multiple fisheries at both larger and smaller scales, particularly those in seasonal fisheries.
- increase collaboration on data gathering to inform stock assessments
- increase uptake of 15% in 2024 in light of a proposed TAC increase of 25% in 2025²
- enhance average price, currently around 40p or 60c per kilo due to the landing of only small individuals under 1 metre being permitted.

The current management measure of the 100cm maximum size is leading to issues such as:

- Large scale dead discarding
- Compulsory landing of individuals unsuitable for the human consumption market, despite good survivability meaning that many of these individuals could have been successfully released.
- Imports of the same species products from outside the EU resulting in high carbon emissions

The Opportunity

¹ [Spurdog guidance 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/spurdog-guidance-2023)

² [Spurdog advice ICES 2024](#)

In the Northeast of the US there is an MSC certified sustainable fishery for spurdog, *Squalus acanthias* (the same species). Gillnets, longline and trawl are all certified as sustainable³. The management involves quotas and catch limits but no size restrictions. They are enjoying market benefits for their certified sustainable fishery.

In Europe, the maximum landing size rules, low value of small fish, and large catch limits means that economically viable fishing entails landing large numbers of small fish. A better alternative would be to permit fewer individuals of a marketable size to be landed, providing greater income from a smaller catch. Based on the proposed 25% increase in TAC for 2025, the maximum landing size should now be revisited, to allow greater social and economic benefit to be derived from the stock. We believe that larger fish can be landed without endangering stock recovery. As they are more valuable, catch limits could be reduced without reducing income – indeed, we believe that income from this fishery would be increased.

The fishing industry is ready to work with the UK and EU administrations on enhanced data reporting to compliment improved fishing opportunities with high quality data that will inform future management in a positive feedback loop.

Proposal

We propose that landing spurdog above 100cm in length should be permitted, but the advised TAC increase from ICES should not be taken up, instead a precautionary TAC level should be set. The larger size could be done on a trial basis of six months to allow us to gather data on the volume of landings created from the change. The fishing industry would provide increased levels of data.

The high survivability of discarded fish should also mean that spurdog are exempted from the landing obligation.

The increased marketability of the catch would generate more income for decreased fishing mortality.

Given the opportunities outlined above, the UK and EU fishing industry requests the inclusion of a statement within the written record that a review of spurdog fishery management will be completed, along with implementing management measures by the end of 2025.

Yours sincerely,

³ [MSC spurdog certification report](#)

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