



Consideration of the current arrangements in respect of wrasse fishing activities on protected areas and species in Scotland

IESS.24.029

July 2025

Case Summary Report

For further background information on this case, please see the previous case summary report by Environmental Standards Scotland (ESS) on our [website](#).

What was the issue?	ESS received a representation alleging that the Scottish Government's Marine Directorate ('Directorate') had failed to carry out an appropriate assessment under the Habitats Regulations ¹ before allowing commercial fishing of wrasse.
What did ESS do?	<p>ESS accepted the case for pre-investigation, made enquiries of the Directorate and NatureScot and concluded that the Directorate had not fulfilled its legal obligations under the Habitats Regulations.</p> <p>The Directorate committed to undertake an appropriate assessment prior to the commencement of the 2025 fishing season. ESS noted that it would monitor progress and consider what further action, if any, was required once the assessment was available for consideration.</p>
What outcome was achieved?	<p>The Directorate has now completed an assessment, consulted NatureScot and published the findings on its website.</p> <p>ESS is now considering the assessment to determine what further action, if any, is required.</p>

¹ [The Conservation \(Natural Habitats, &c.\) Regulations 1994](#) (the Habitats Regulations) provide the legal framework for protected sites and species requiring strict protection. Regulation 48 requires an 'appropriate assessment' to be undertaken for any plan or project likely to have a significant effect on a protected site. For a project or development to proceed, the appropriate assessment must demonstrate that the site integrity will not be adversely affected. Where potential adverse effects are identified, mitigation measures can be implemented to prevent or reduce them to an acceptable level.

Background

Wrasse have been used in aquaculture since the late 1980s as cleaner fish to manage sea lice. However, wrasse are also ecologically important in rocky reef systems. Concerns have increased about declining populations, and the wider ecosystem impacts caused by their removal.

The representation asserted that the Directorate had not undertaken an appropriate assessment to consider the potential wider ecological impacts to reefs and protected species prior to allowing wrasse fishing to occur and that it was potentially harming protected features and species.

ESS' consideration

Considering the information provided in the representation, evidence collated and relevant environmental law, ESS made enquiries of the Directorate.

The Directorate confirmed that an appropriate assessment under the Habitats Regulations had not been conducted. The Directorate justified this position by setting out that wrasse are not a protected feature and there was no evidence of significant impacts occurring on protected features.

Recent evidence² assessed by ESS highlighted the key role of wrasse in rocky reef ecosystems and emphasised that their removal could harm the condition and conservation status of these habitats. Consequently, ESS determined that the Directorate's failure to undertake an appropriate assessment was not compliant with the Habitats Regulations.

ESS engaged with the Directorate to resolve the issue through informal resolution. The Directorate agreed to:

- undertake an appropriate assessment before the 2025 fishing season
- consult NatureScot during the process
- publish the assessment and NatureScot's advice

² [NatureScot Research Report 1207 - Assessing the implications of wrasse fishing for marine sites and features | NatureScot](#)

Outcome achieved and next steps

On 13 June 2025, the Directorate published a document entitled 'Inshore waters - regulated commercial use of traps/pots to catch wrasse: fisheries assessment,' together with advice provided by NatureScot.

ESS is currently considering this assessment, and related information, to determine what further action, if any, is required.

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