



The Fishmongers' Company

SUSTAINABLE FISH

A View From The Fishmongers' Company



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Sustainable Fish

A View From The Fishmongers' Company

Introduction

The Fishmongers' Company has been closely involved with the fish industry for more than 700 years. It aims to promote a healthy, prosperous and sustainable fish and fisheries sector for the long-term benefit of the United Kingdom. The Company's Fish & Fisheries objectives are summarised on page 16.

The Company welcomes the current public debate on sustainable fisheries and hopes to contribute to the debate in a way which will help enlarge common ground and lead to positive results. It attaches particular importance to finding approaches soundly based on science. This note is a summary of the Company's understanding of the main current issues.

The problem

For many years the world's oceans and rivers were considered to be a bottomless well, which would provide a bountiful harvest for ever. In 1883 the great biologist, Thomas Huxley, wrote "Probably all the great sea fisheries are inexhaustible, that is to say that nothing we do seriously affects the number of fish".

However the increasing global demand for seafood and the modern boats and modern fishing techniques developed to meet the demand have changed all that. Many seas and rivers and many species of fish are already fully exploited or over-exploited, and there is increasing interest both among suppliers and buyers, as well as among the general public, in sustainability.

The latest global survey (2002) by the UN's Food and Agriculture Organisation (FAO) covered some 600 fish stocks and stock items and concluded that:

- 28% of stocks were over-fished, depleted or recovering;
- 47% of stocks were fully fished;
- 25% of stocks were moderately fished with some room for expansion.

The vast majority of stocks were not assessed, so the conclusions must be treated with caution, but it is clear that we need to reduce the proportion of over-fished stocks.

Definitions

Sustainability is a very general concept which can be defined and addressed in different ways.

In 1987 the Brundlandt Commission defined "sustainable development" as:

"development that meets the needs of the present generation without compromising the ability of future generations to meet their own needs".

In 1995 the FAO published a Code of Conduct for Responsible Fisheries in which it states that:

"the right to fish carries with it the obligation to do so in a responsible manner so as to ensure effective conservation and the management of the living aquatic resource"; and

"the best scientific advice available must be taken into account in order to evaluate the current state of the fisheries resource and the possible impact of the proposed measures on the resource".

Debate about what exactly is meant by **sustainable fisheries** has identified three main aspects:

- **Stock-size sustainability:** This is probably the aspect most discussed, with a well-known example being the over-fishing of cod over many years in the North Sea. Although there are great difficulties about auditing fish stocks, not least because the harvest is essentially a "wild" one, and about calculating re-population rates in different environmental conditions, it has

been considered possible to reach some scientific conclusions about the proportion of the fishery which can safely be taken from the stock each season – the Maximum Sustainable Yield (MSY). This is typically about 30% of stock, though the evidence needs to be considered for each species (in the case of orange roughy, 30% proved to be a severe over-estimate, as the species does not mature and breed for many years). Such a harvest plus natural mortality equals or is less than the stock's recruitment in the following season. (However there is current debate about the pertinence of the MSY approach from new research.)

- **Ecosystem sustainability:** However it may also be argued that sustainable fisheries need to consider not just individual stocks but the wider impacts of each fishery, in particular:

- whether the fishery's bycatch damages other species (as the nets used for scampi and langoustine fishing in the North Sea have had a highly detrimental impact on stocks of juvenile cod in some areas); and
- whether the fishery damages the marine habitat (as dredging for scallops has done to the seabed and associated flora and fauna eg sea fans, in some areas).

- **Life-cycle sustainability:** There is also increasing concern about the whole life-cycle of seafood, as of other products: the "carbon footprint", transport to the end-user ("food miles"), packaging, waste implications etc. (But seafood should of course be seen in context: there are sustainability issues about most large-scale food production in the developed world.)

In addition those engaged in the fish industry need to consider the **economic or business sustainability** of their operations, short and long term. There are also **social sustainability** issues: the fisheries and aquaculture sectors are a direct or indirect source of livelihood for over 500 million people and a vital factor in global food security.

The Fishmongers' Company provides practical support for marine science in a number of ways and strongly encourages a rational, science-based approach to the sustainability debate.



Responsible fisheries

Some commentators use the term “responsible fisheries” differently from the FAO Code, intending this as an intermediary step to the more demanding sustainability criteria. On this view fisheries can be categorised along the following spectrum:

- illegal/unreported/unregulated
- legal
- responsible
- sustainable

Within the UK in 2006 the Seafish Industry Authority launched a Responsible Fishing Scheme that is receiving widespread support from UK fishermen. The Scheme aims to promote “best practice” harvesting and handling techniques, training of fishermen, including health and safety measures, avoiding littering at sea and improving the quality of landed seafood. More information is available at: www.seafish.org



Fish Lists and Certification

Over recent years, a number of organisations have tried to provide sustainability guidance to producers and consumers by producing lists of endangered fish stocks or by certifying fish caught from stock-size sustainable fisheries.

The Marine Conservation Society (MCS: www.mcsuk.org) is at the forefront of work on fish lists in the UK. It produces lists of “Fish to Eat” and “Fish to Avoid” and a “Pocket Good Fish Guide”. It runs the website www.fishonline.org, a database which consumers can search at either “simple” or “advanced” level to obtain information on the status of particular species and fisheries, rating them on a scale of 1 (good) to 5 (bad) for sustainability.

The Marine Conservation Society also works with

- the Marine Stewardship Council (MSC: www.msc.org),
- SeaWeb’s Seafood Choices Alliance (www.seafoodchoices.org), and
- Sustain (www.sustainweb.org)

in the **Good Catch** initiative, aiming to help food-service professionals find out the facts on sustainable fisheries, including by publication of a “Good Catch Manual” and a monthly e-bulletin, “Fish Flash”. More information is available at www.goodcatch.org.uk.

Seafish (www.seafish.org) have recently produced a series of Responsible Sourcing Guides, in addition to their general guide to Fish Sustainability.

Greenpeace (www.greenpeace.org.uk) also produce a “red list” of fish to avoid. And Charles Clover’s www.fish2fork.com website is a new initiative aimed at giving consumers advice on restaurants’ sustainability policies.

Some other organisations also produce fish lists. The methodology and quality of such lists varies, however, and they need regular review if they are to remain up to date. Nonetheless, and despite some discrepancies, the lists are generally aligned and are a valuable tool for the public. A major issue remains that accurate harvesting data (where and how fish have been caught etc) need to be passed down the supply chain enabling consumers to use the guides effectively. For example tinned tuna rarely specifies on the tin which species of tuna is used (though in fact most is sustainable skipjack). And few fish and chip shops tell their customers what is the origin of the plaice or haddock they sell, though there is both sustainable and unsustainable fishing of both species within UK waters.

In December 2009 a major report on fish sustainability information schemes, commissioned by the Seafish-supported Fish Sustainability Information Group, was published by the Marine Resources Assessment Group (MRAG: www.mrga.co.uk).

The **Marine Stewardship Council** (www.msc.org) has since 1999 been operating an independent certification and labelling programme for wild-caught fisheries which it judges to be

sustainable and environmentally well-managed. By November 2010 it had certified 98 fisheries. Many of the multiple retailers now try to source MSC-certified seafood when it is available. The MSC scheme is the only global scheme fully compliant with the FAO Code of Conduct. It should be noted, however, that not all sustainable fisheries are certified by the MSC. Some small scale fisheries cannot afford the cost of certification by a third party or are data-deficient. It may also be argued that certain fisheries notably those in Iceland and Norway, are so well-managed by the national authorities that producers there may consider individual external certification unnecessary.

The **Aquaculture Stewardship Council** (www.ascworldwide.org) was established by WWF and a Dutch NGO in 2009 to operate a global certification and labelling programme for farmed seafood – an aquaculture version of the MSC.



Supermarkets

Most supermarket chains have adapted their sourcing approach to give considerable emphasis to sustainability. Some require all seafood sold to be “responsibly-certified” and/or have set target dates for requiring all seafood sold by them to be MSC-certified. Information on the approach taken by some of the major players can be found at the following weblinks:

Asda

- <http://your.asda.com/sustainability-policies>

Morrisons

- <http://www.morrisons.co.uk/Our-fresh-food/Producing-our-food/Morrisons-certified-sustainable-fish/>

Tesco

- http://www.tesco.com/greenerliving/greener_tesco/what_tesco_is_doing/sustainable_living.page

Sainsburys

- http://www2.sainsburys.co.uk/food/foodandfeatures/safety_quality/articles/fish.htm

Waitrose

- <http://www.waitrose.com/food/foodissuesandpolicies/sustainablefishing.aspx>

Marks and Spencer

- http://corporate.marksandspencer.com/howwedobusiness/our_policies/sustainable_raw_materials/sustainable_processes

Aquaculture

Aquaculture can make an important contribution to sustainability of fisheries, provided that:

(a) any feed used is sustainable. (Often small fish such as anchoveta are used, but fishmeal is increasingly being produced in ways which do not rely on wild-caught fish, including use of the waste products of the fish industry. In the past aquaculture has used disproportionate amounts of feed relative to amount of farmed fish production, but modern husbandry techniques can achieve conversion rates of 1.7: 1 or even lower, a much higher “efficiency” than for wild fish. Moreover some aquaculture products are herbivorous, ie there is no reliance on fishmeal.); and

(b) farms are managed in ways which are environmentally sound. Problems associated with finfish aquaculture typically include:

- Containment problems resulting in the possibility of compromise of adjacent wild stocks, many of which may be highly genetically adapted, through genetic introgression;

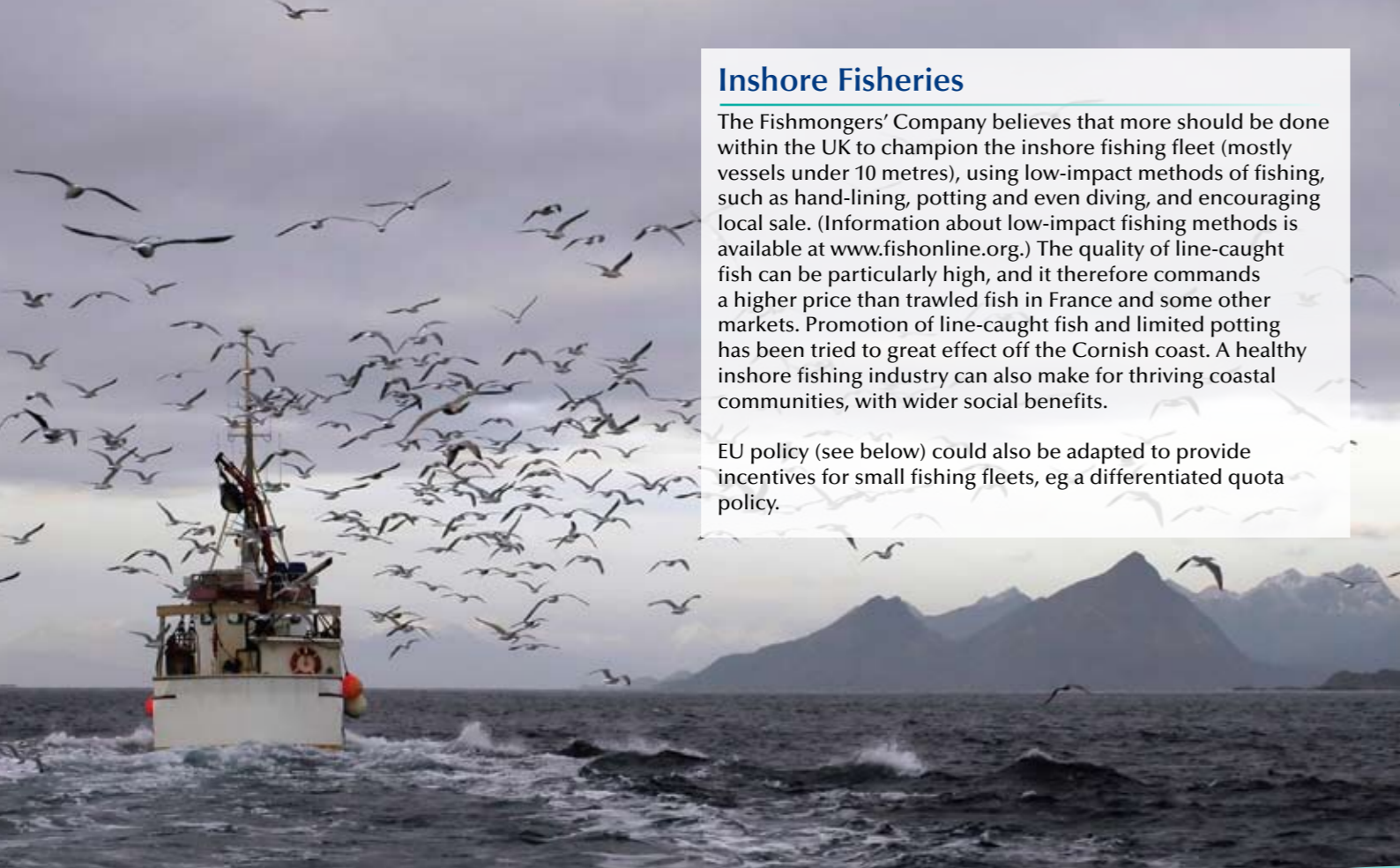
- Incubation of fish diseases and parasites at well above natural background levels as a result of the intensive nature of the process which can have corresponding impacts on adjacent populations of wild fish;

- Impacts on water quality - either local or regional - as a result of accumulations of food/waste products or treatments.

Shellfish aquaculture, especially for filter-feeding molluscs, generally has little impact, using no added food inputs. Because they are feeding at the base of the marine food chain, the available plankton resource is vast and the human impact is proportionately less than with species higher up the food web.

(The Fishmongers’ Company is currently preparing a fuller statement of its views on UK finfish aquaculture, particularly salmon farming.)





Inshore Fisheries

The Fishmongers' Company believes that more should be done within the UK to champion the inshore fishing fleet (mostly vessels under 10 metres), using low-impact methods of fishing, such as hand-lining, potting and even diving, and encouraging local sale. (Information about low-impact fishing methods is available at www.fishonline.org.) The quality of line-caught fish can be particularly high, and it therefore commands a higher price than trawled fish in France and some other markets. Promotion of line-caught fish and limited potting has been tried to great effect off the Cornish coast. A healthy inshore fishing industry can also make for thriving coastal communities, with wider social benefits.

EU policy (see below) could also be adapted to provide incentives for small fishing fleets, eg a differentiated quota policy.

European Common Fisheries Policy

The Fishmongers' Company strongly agrees with the assessment in the European Commission's Green Paper of April 2009 that the Common Fisheries Policy has failed to meet its objectives, including in the area of sustainable fisheries, partly because decisions are often taken in the Council of Ministers on short-term, political grounds, and that in future ecological sustainability should be a basic premise for the future of European fisheries. The Company also agrees that European fisheries control has been weak and with patchy and inconsistent enforcement.

The EU management system for fish covered by quotas is based on Total Allowable Catches of fish landed on the quayside rather than all fish landed on the boat. One result is that in the EU many fish (both under-size or low value target species and non-target species) are discarded at sea rather than landed on shore. This makes it difficult, if not impossible, for scientists to obtain the accurate biological reference points to determine the status of a particular stock. The scientists can only give a "best guess" estimate as to how much is thrown away compared to how much is landed and this has led to problems with many stocks.

The Fishmongers' Company favours a reform of the CFP to include a requirement that discarding at sea should be stopped by an early deadline and that all caught fish should be landed and counted against quotas, with an enforcement mechanism on similar lines to that which has proved itself effective in Norway.

The management of the 6-12 nautical mile zone is also problematic. At present under a derogation from the CFP valid until end-2012 national authorities are responsible for the 0-6 mile zone but in the 6-12 mile zone where fishing by vessels from some other EU member states have traditional access rights they are not subject to UK standards (eg higher minimum landing sizes for some species including bass, crab and lobster).

The Fishmongers' Company believes that if inshore fisheries are to be managed sustainably both the derogation must be made permanent or continued long-term and national legislation and regulations must be made applicable to all vessels out to 12 nautical miles.



Shellfish

Shellfisheries, wild-caught and cultivated, are, with few exceptions low-impact methods of production. A report produced for the Shellfish Association of Great Britain has shown that the catch of many UK shellfisheries can be sustainably increased and all shellfish cultivation can sustainably expand. Greater consumption of domestic shellfish would be a good way to increase seafood consumption in the UK, with all the associated health benefits, without having an impact on sustainability.

However high-impact fisheries, such as scallop dredging, can have an adverse impact in sensitive habitats. The Shellfish Association of Great Britain, supported by the Fishmongers' Company, is working for an agreed approach within the industry to address these issues effectively.

Some individual species

Detailed advice is available from the MCS publications mentioned above, but the Annex to this note includes short notes on some of the most popular species

Diversification

Many UK consumers are conservative on their choice of fish species, relying on familiar names and cooking methods. The sustainability and health benefits of more diversification have already been mentioned above under the section on UK shellfish heading, but they apply too to underutilised finfish species, provided they are managed appropriately.

Fishmongers' Hall

The Fishmongers' Company has adopted a policy of serving at functions in its Hall:

“only responsibly-sourced fish and shellfish, fished in sustainable ways, including responsible aquaculture”.

It is intended to make this commitment clear on menus and also to make available to members of the Company and guests information sheets specifying where fish and shellfish served were landed or produced and how they were fished.

The Company's Fisheries Inspectors will maintain regular contact with the Company's suppliers about Company policy and sustainability issues in general.

The Company is also discussing sustainability issues with other City Livery Companies and the Corporation.

Conclusion

It would be disastrous if either excessive exploitation of the oceans and rivers or exaggerated worries about sustainability deprived consumers of the benefits and pleasures of eating fish and shellfish. There are many well-managed fisheries and cultivation operations, providing excellent quality fish and shellfish from responsible sources. There is no room for complacency but, with good management and close cooperation between scientists on the one hand, and the fishing industry and regulators on the other, global seafood consumption can still be increased in a sustainable way.

The Fishmongers' Company believes that close, rational and science-based attention to fisheries sustainability is to the long-term benefit of fish and shellfish stocks, the consumer and the entire UK fisheries industry. Both the quality and the value of UK products could be enhanced by establishing even stronger sustainability and other best practice credentials through accreditation of fisheries and certification of products.

The Company particularly supports efforts to ensure that fish and shellfish harvesting data is passed along the entire supply chain, from sea to plate, to make it easier for all to make well-informed decisions about the products which they buy and eat.

Annex: Some Individual Species

Cod

Cod stocks in the North Sea and other UK waters remain at historical low levels, far below the minimum precautionary level, and, despite efforts to rebuild stocks, which are showing some promising signs, the level of fishing pressure on them (including as bycatch) remains far too high. The quota, reviewed annually, is just over 20,000 tons per annum. This represents about one tenth of the cod consumed in the UK.

By far the two largest cod fisheries are the Icelandic and Barents Sea (shared between Russia and Norway).

The Icelandic cod quota is the second largest in the world and is set at around 200,000 tons per annum. It is a well managed fishery and is extremely important to the Icelandic economy. The Icelandic scientists monitor the situation very closely and make recommendations to the Icelandic Government on the quota levels which are immediately acted upon. There is much excellent quality Icelandic cod sold in the UK, with the very best being line caught in Iceland and then flown into the UK.

The Barents Sea has the largest stock of cod in the world with a biomass estimated to be in the region of 2.5 million tons, with the quota for 2010 being set at 577,500 tons. The fishery is currently undergoing assessment by the Marine Stewardship Council as being a sustainable fishery. In Norway the catches are constantly checked by the scientists and as soon as more than 4% of the catch is shown to be juvenile the fishery is

closed until further notice. Many fish and chip shops in the UK serve excellent quality frozen-at-sea cod that originates from the Barents sea.

Baltic cod stocks are believed to be on the road to recovery, having steadily increased since 2005 and now reportedly at their highest level during the past 10 years.

Quantities of Pacific cod are also being imported into the UK, much coming from MSC-certified fisheries.

Most of the cod sold in the UK is imported from well-managed sustainable sources (although there may be “life-cycle sustainability” issues about such imports). But consumers may wish to check the source with their supplier.

Salmon *(wild and farmed)*

There are two main categories of salmon: Atlantic and Pacific

The Pacific salmon is sub-divided into several different species of which the 5 most important from a commercial point of view are:-

- Chinook (king)
- Sockeye (red)
- Coho (silver)
- Pink (humpback)
- Chum (dog)

The main sources of supply for these fish are in Alaska and Canada, with smaller quantities from other parts of the USA.

The Alaskan salmon fishery is the largest of the fisheries producing around 300,000 tons per annum and encompasses all 5 of the main species. This fishery is also accredited by the MSC as being sustainable.

The British Columbian fishery for pink, chum and sockeye is currently under assessment by the MSC along with the Californian Chinook fishery. The total production from these fisheries is relatively small compared with the Alaskan. However, there are also large quantities of wild Pacific salmon available from Canada which are not presently undergoing certification but may be considered sustainable.

The Atlantic salmon is available both wild and farmed, with the farmed being available as traditional or organic.

Wild commercial fisheries are restricted to the remaining net fisheries in the UK. In Scotland these fisheries report less than 20,000 fish per annum. The sale of rod-caught fish is now illegal within England, Scotland and Wales. Wild Atlantic salmon catches in the UK are at an historically low level (though this is distorted by the active buy out of net stations for conservation purposes), and the season is quite limited. Given this severe pressure wild salmon is listed as an endangered species on most advisory sites, ie on the red list of fish to be avoided.

The main driver for salmon abundance appears to be marine survival rates, which have reduced from a possibly unnaturally high level in excess of 30% to around 5% today. It appears that marine survival has stabilised at this low level and is still sufficiently high to enable significant salmon stock recoveries eg urban rivers – Tyne / Clyde / S.Wales rivers.

By contrast the farmed Atlantic salmon is the third most globally produced fish from aquaculture. Most salmon produced for the table in the UK is sourced from the Scottish and Norwegian salmon farming industry. Norway is the largest producer in the world, with around 700,000 tons per annum, followed by Chile and then Scotland which produces 170,000 tons per annum. Chile was at one point challenging Norway for supremacy in terms of annual output, but disease problems have seriously compromised their production over the past couple of years.

As an alternative to traditional farmed salmon there are growing quantities of organic fish available. Environmentally these are far less contentious than their traditionally farmed cousins but organic farming is much more expensive and therefore the fish will cost a lot more to purchase. In terms of eating quality there is very little difference between the two and the health benefits derived from fish produced by the two different methods of farming will be equally as good.

Sea Bass

Two forms of sea bass are available: wild and farmed

The wild sea bass is a non-quota species and as such can be caught by any fisherman. However, in order to protect the wild bass there are minimum landing sizes imposed by the EU, making it illegal to land a bass that is less than 36cm from the tip of its snout to the end of the tail. The object of the minimum size is to allow the fish to breed before they can be caught. Most of the bass fishing in the UK is along the south coast where the bass are caught by small inshore boats on baited longlines, which is a sustainable method of fishing. Further out in the Channel the French catch bass using pair trawling, a method that utilises a net strung out between two fishing boats. This is a very destructive (though efficient) form of fishing and should not be encouraged.

One small bass fishery on the North East coast of England has been certified as sustainable by the MSC, and the Bristol Channel bass is currently undergoing assessment by the MSC.

The vast majority of bass sold in the UK now comes from farmed sources either Greece or Turkey, where the fish are farmed in both the Mediterranean or Aegean seas. There is also bass farming elsewhere in Europe, including organic farming in Southern France and also in the UK. The fish farming in Europe is very well managed and the farmed product is of a very high quality.

Retail product should be labelled as wild or farmed, and if farmed the Country of origin.

Prawns

There are two main categories of prawns: cold water and warm water.

The cold water prawn is caught around the North Atlantic belt from Canada through Greenland, Iceland, Russia and Norway, and is the prawn that has always traditionally been consumed in the UK for salads, sandwiches and prawn cocktails. This prawn makes up around 10% of the world's production. The gear used in the North Atlantic fishery creates very little bycatch, less than 1%. Stocks of these prawns seem healthier than ever. The Canadian inshore fishery is certified as sustainable by the MSC

The warm water prawn accounts for 90% of world production, around 50% of this coming from the wild and 50% from farming. Annually the production from aquaculture is increasing globally. There are numerous varieties of warm water prawns, but the three main varieties sold in the UK are the giant tiger prawn and two forms of white prawn. Most sold in the UK will come from aquaculture and are brought in from all around the globe. Although there have been serious issues concerning farmed warm water prawns, notably the destruction of natural habitats and the conditions of the workers, the vast majority of prawns brought into the UK come from environmentally and ethically approved sources. As well as monitoring by the competent authorities in the countries of origin, they are usually audited to a higher standard by the UK importers to ensure that only product produced to the highest possible standards is brought into the UK.

Crab

There are many different varieties of crab but the one most commonly consumed in the UK is the European Brown Crab, *Cancer pagurus*. Crabs are generally caught in an environmentally friendly and sustainable manner using either baited inkwell pots or more commonly baited creels. This method of capture means that the animals are brought up alive which allows the fishermen to safely return the immature specimens to the sea undamaged.

Historically, the crab fishery around the UK has produced a bountiful resource with the largest specimens coming from either the West Country or the Channel Islands, and slightly smaller specimens being caught along the North Norfolk coast. The relative size of the crabs from the different areas is reflected in the local minimum landing sizes (MLS). There is an EU minimum landing size for these crabs of 115mm across the broadest part of the back off North Norfolk, while the Central North Sea (IVb) and Irish Sea (VIIa) has an MLS of 130mm. Everywhere else the MLS is 140mm. However, the local sea fisheries committees are allowed to establish local by-laws to control the stocks in the inshore waters out to 6nm and many have opted for much larger landing sizes than the EU. This has been done locally to ensure the crabs are not landed before they have had the chance to reach maturity and reproduce.

The main concern for the long term well-being of crab stocks is that due to problems with lack of quota many traditional fishermen have converted their boats to crabbers. This means that there is a greater fishing effort on the stocks than ever before. Unless action is taken to control entry into the fishery this could result in long term problems. The Fishmongers' Company and the Shellfish Association of Great Britain have been lobbying for the introduction of pot limitations for the fishermen, ie restricting the amount of pots a fisherman can lay down.



The Fishmongers' Company & Fish And Fisheries



Taking account of the Company's original long history as an association of fishmongers; its right under Royal Charters to inspect fish sold in London and to see whether or not they are "wholesome for man's body"; and its powers under the Salmon and Freshwaters Fisheries Act 1975 and other legislation; the Fishmongers' Company continues to see work on fish and fisheries as central to its purposes.

Its aim in this regard is:

to promote a healthy, prosperous and sustainable fish and fisheries sector for the long-term benefit of the United Kingdom.

The Company seeks to advance this objective in various ways, including:

- encouraging the development of a thriving retail fish sector, with special focus on the key role of supermarkets, notably through the educational work mentioned below, and seeking to identify ways of generating revenue to support the Company's work in the sector;
- helping to stimulate consumer demand for fish by educational and promotional activities, including promulgation of information about the benefits to health of eating seafood;
- helping to promote a rational, science-based debate about sustainable fisheries, both marine and freshwater, and aquaculture, encouraging fishermen, suppliers and consumers to take a responsible approach and recognising the achievements of those who have contributed to the sustainability of fisheries and the conservation of rivers and the marine habitat;

- conducting inspections at Billingsgate Market, condemning poor quality fish and providing advice and support to merchants, customers and the port and local authorities' environmental health inspectors;
- supporting certain charities or other organisations making valuable contributions in the fish and fisheries sector, including the Shellfish Association of Great Britain, the Salmon & Trout Association, the Atlantic Salmon Trust, the Rivers and Fisheries Trusts (Scotland), the Association of Salmon and Fisheries Boards (Scotland) and the Billingsgate Seafood Training School while encouraging them to move towards self-reliance, especially for core costs;
- influencing Government policy in a non-political way, notably by contributing independent expertise to government consultation exercises regarding the sector, including on matters concerning the European Union's Common Fisheries Policy, acting in partnership with other bodies where appropriate and effective; and contributing to industry initiatives and coordination, eg Seafish Advisory Working Groups;
- supporting academic institutions and postgraduate students working on valuable fish and fisheries-related research;
- acting as a facilitator for rational debate, providing a forum for such debate aimed at overcoming differences of view on matters affecting the sector and where possible drawing together disparate organisations in pursuit of common objectives.

