



Ms Mairi Gougeon  
Cabinet Secretary for Rural Affairs, Land Reform and Islands  
The Scottish Government

October 9 2023

Dear Mairi Gougeon,

With reference to the ongoing consultation on proposals to close fisheries for sandeel in all Scottish waters, I am deeply concerned about the possible measures presented.

The fisheries for sandeel in Scottish waters is of great significance to the Danish fishers, and a possible ban will affect not only the Danish fisheries sector, but also the entire value chain with significant economic consequences to ensue.

Scotland and Denmark hold a longstanding tradition for a constructive bilateral cooperation through a relationship built on common interests and the mutual understanding of fisheries. Denmark has always appreciated this.

Denmark supports an approach whereby the sustainable management of fish stocks is based on the best scientific advice available. The independent scientific advice provided by the International Council for the Exploration of the Sea (ICES) follows an ecosystem-based approach, taking into account factors affecting the marine ecosystems when assessing the state of the fish stocks. This methodology ensures that the annual fishing opportunities for sandeel are sustainable.

Scientists from the Danish scientific institute DTU Aqua, state that there is neither evidence of long-term decline in sandeel in the assessed area in Scottish waters nor increased frequency of low recruitments. In this context, the considerations regarding a possible ban for sandeel fisheries in Scottish waters seem to be scientifically questionable and may very well be disproportionate.

I would refer to the joint request submitted by the UK and EU to ICES *“to provide further information on how ecosystem considerations, particularly predator-prey interactions and the rebuilding of sensitive higher trophic level species such as certain seabirds, and other ecosystems-based fisheries management aspects are factored in and applied in the provision of single stock advice for forage fish species”*.

I find it prudent to await the reply from ICES on this request prior to any decisions on the issue. As the sandeel season does not commence until April of next year, there is ample time for a comprehensive analysis of the scientific basis.

My ministry has sent a detailed reply 9 October 2023 to the public consultation based on a scientific analysis of the proposed advice on spatial management measures.

With this letter and the detailed reply from the ministry, I would urge you to reconsider the matter. Please do not hesitate to contact my services or me for clarifications or further discussions.

Yours sincerely,



Jacob Jensen