

GREENPEACE



**PROTECT
THE OCEANS**



BRIGHT BLUE SEAS:

**THE NEED TO PROPERLY PROTECT OUR
OFFSHORE MARINE PROTECTED AREAS**

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FOREWORD AND EXECUTIVE SUMMARY

The UK's network of Marine Protected Areas (MPAs) are our government's much lauded symbol of the UK's 'world-leading' marine protection standards. On paper, the network appears impressive. More than 25% of our territorial waters are covered by Marine Protected Areas, allegedly safeguarding important ecosystems like reefs and kelp forests, and protecting iconic species like porpoises and dolphins. Over half are thought to contain habitats vital for the UK's future climate resilience.

However, there's a catch... because a deeper look into the state of the UK's offshore Marine Protected Areas, the areas we will have new powers to protect after leaving the EU Common Fisheries Policy (CFP), reveals an alarming reality completely at odds with the rhetoric used by our government. Only five of the 73 UK offshore MPAs 'may be' progressing towards conservation targets, and only two out of 73 offshore MPAs have any long-term site condition monitoring available.

Worse, highly destructive industrial fishing continues on a vast scale inside supposedly protected parts of UK waters. Supertrawlers (huge trawlers over 100 metres in length) collectively spend thousands of hours each year fishing in UK Marine Protected Areas, including in MPAs established specifically to protect porpoises, a species potentially threatened by this activity.

Our government has repeatedly stated that leaving the European Union will provide us with a historic opportunity to implement better protection for our oceans. Defra Minister, Rebecca Pow, in response to a parliamentary question on supertrawler activity in MPAs, said: "the Common Fisheries Policy has restricted our ability to implement fisheries management measures within offshore Marine Protected Areas. The Fisheries Bill proposes a new power to allow the introduction of measures for conservation purposes, both within our MPAs and more widely across English waters."¹

The former Environment Secretary Michael Gove also said in 2017 that through Brexit we can: "ensure that we can have sustainable fish stocks for the future... I think it's important that we recognise that leaving the European Union is going to help the environment."²



As Brexit negotiations continue in spite of the COVID-19 pandemic, the deadline for a post-Brexit fisheries agreement with the EU looms large. Our government now has a chance to set the record straight and fix our broken network of offshore Marine Protected Areas, which are no more than lines drawn on a map with little meaningful protection.

If they don't seize this chance, then the government should not continue to posture as a leader in ocean protection on the world stage, whilst it fails to properly protect important marine areas on its own doorstep.

Brexit, regardless of your opinion on the matter, is a real opportunity to create positive change for the seas around the UK. The question now is whether our government will live up to its rhetoric, and do what is necessary to properly cherish our oceans.

Chris Packham

SUMMARY OF FINDINGS:

- The UK's 73 offshore MPAs were analysed for the purposes of this report. The UK government will have new powers to protect these MPAs at the end of the transition period for leaving the EU on 31 December 2020.
- Of these 73 offshore MPAs, only five 'may be' progressing towards their conservation targets, and only one of those five has the adequate long-term site condition monitoring required to assess progress towards conservation targets with confidence. This is according to the Joint Nature Conservation Committee's MPA listings.
- Just two of these 73 offshore MPAs have long-term site condition monitoring available.
- In total, supertrawlers (none of which are UK owned) spent 2,963 hours fishing across 39 different UK MPAs in 2019. This is the equivalent of 123 days of continuous fishing activity in UK MPAs in a single year.
- EU flagged supertrawlers spent 1,120 hours fishing in UK MPAs in 2019. The EU boats that spent the most time fishing in MPAs in 2019 were: Willem van der Zwan (437 hours), Maartje Theodora (169 hours), Annelies Ilena (142 hours) and Margiris (98 hours). These are the 4 largest supertrawlers in the world.
- Non-EU flagged supertrawlers spent 1,843 hours (that's more than 76 days) fishing in UK MPAs in 2019.
- Supertrawlers spent 82 hours fishing in two conservation areas established specifically to protect dolphins and harbour porpoises.
- In the first six months of 2020, supertrawlers spent 5,590 hours fishing in UK Marine Protected Areas, almost double the number of fishing hours compared to the whole of 2019.
- Other destructive fishing vessels operate in offshore MPAs, including sand eel trawlers and boats equipped with electric pulse gear.
- Greenpeace UK is calling on the UK government to ban destructive fishing, beginning with supertrawlers, in all UK MPAs once the UK leaves the EU's Common Fisheries Policy.
- Greenpeace UK is also calling on the UK government to implement stricter regulations for all UK offshore MPAs, and to step up and fight for 30% of the world's oceans to be fully protected by 2030.



CHAPTER 1

UK OFFSHORE MPAS

UK MPAS IN CONTEXT

Marine Protected Area (MPA)³ is the umbrella term for places at sea which are supposed to be managed and protected from certain types of environmentally damaging activities, with the aim of protecting marine life, habitats and ecosystems.

The UK has a few different types of MPAs, which form a network of protected areas in the UK's waters. Each devolved nation in the UK has the power to create MPAs to protect ecologically important marine areas. In England, Wales and Northern Ireland, these areas are called Marine Conservation Zones (MCZs). In Scotland, they are called Marine Protected Areas.

There are also European Marine Sites, designed to protect wildlife and habitats deemed important at a pan-European level. There are two types of these: Special Protection Areas protect birds and their essential habitats, and Special Areas of Conservation protect other wildlife and habitats. Together, these form a Europe-wide network of protected areas on land and at sea (the 'Natura 2000' network), designed to safeguard wildlife most at risk.

For simplicity, this report will use the blanket term Marine Protected Area (MPA), when referring to areas of the ocean that have been designated as protected.

There are 355 MPAs in UK waters, covering more than 25% of the country's waters.⁴ Of these MPAs, 73 are

Map of all 73 UK Offshore MPAs



entirely or partially in offshore UK waters. Offshore waters are those more than 12 nautical miles from the coast, while inshore waters are less than 12 nautical miles from the coastline.

Members of the European Union, under the Common Fisheries Policy (CFP), cannot impose restrictions on fishing activity within offshore MPAs without agreement from other member states, making it difficult to implement stronger environmental regulation, particularly regarding fisheries. Recent legal research highlights the tension between the CFP and EU nature conservation law; fishing is treated differently to other offshore activities, which are only subject to license if environmental obligations are fulfilled.⁵

When the UK leaves the Common Fisheries Policy, implementing stronger fisheries restrictions will become more viable, as the UK government will have new powers to regulate fishing activity in offshore waters up to 200 nautical miles from the UK's coast, including inside MPAs. This research focuses specifically on the status of these offshore MPAs, in which the UK government will soon have a historic chance to strengthen protections.

THE UK GOVERNMENT'S RHETORIC

The UK government has repeatedly acknowledged that leaving the European Union and CFP will allow it to

better manage fishing in protected areas. For example, in response to a BBC Reality Check article about fishing quota,⁶ a spokesperson for the Department for Environment, Food and Rural Affairs said: "after the transition period we will have the right to decide who fishes in our waters and on what terms.

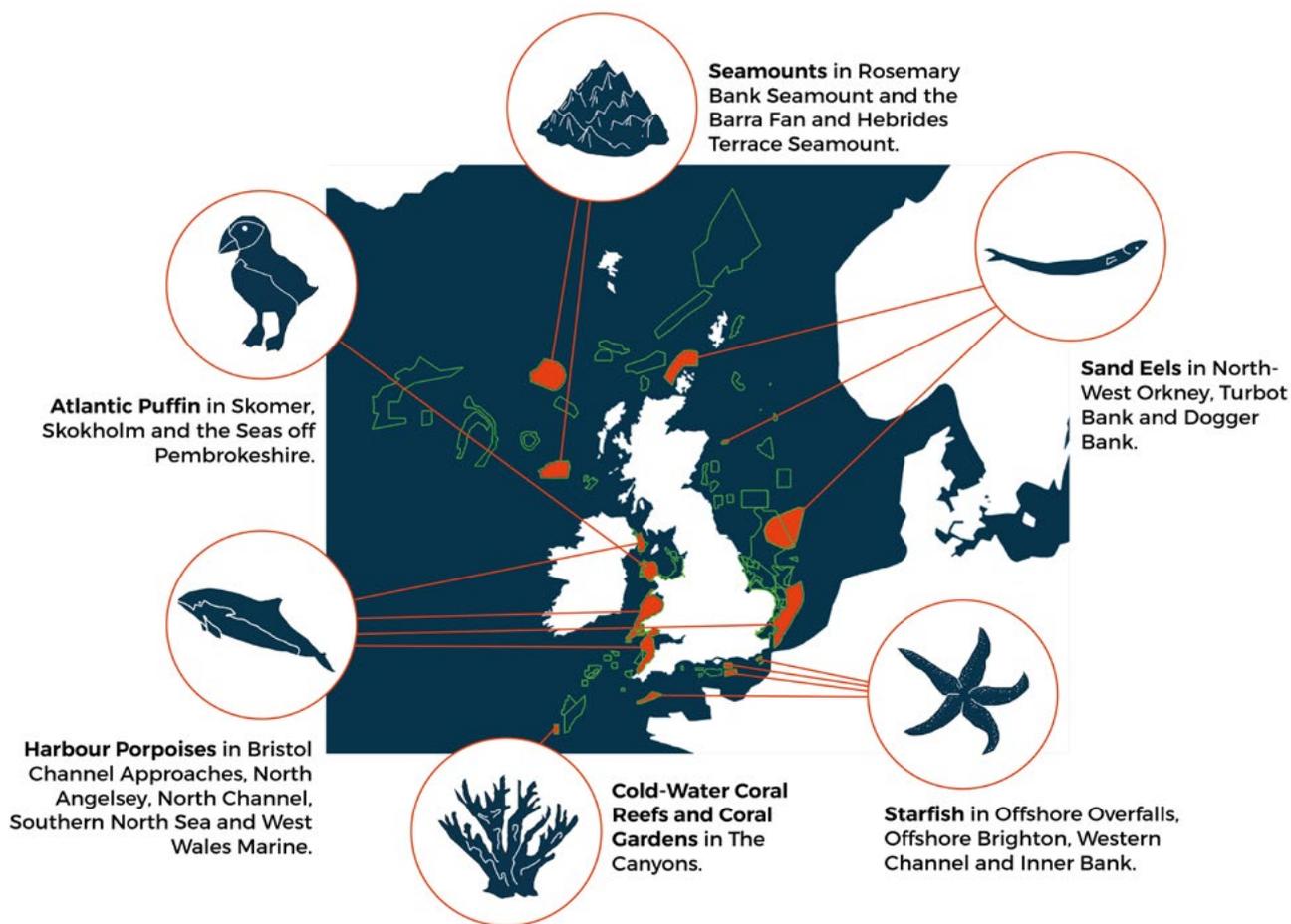
"Any decisions about giving access to fish for vessels from the EU, or any other coastal states will be a matter for the UK to decide. During the transition period, we will abide by the existing rules.

"As a responsible independent coastal state, we want our fisheries managed in a way that the rest of the world will want to follow – one that protects our precious marine and coastal areas while enabling our seafood sector to thrive."

The UK government has consistently praised its own work in creating the UK's MPA network. Michael Gove, when he was Environment Secretary, boasted when announcing the final tranche of MPAs in 2019: "The UK is already leading the rest of the world by protecting over 30% of our ocean."⁸

The UK government presents itself as a global leader in ocean protection,⁹ citing aspirations to create a 'gold standard' for sustainable fishing.¹⁰ It has also admirably spearheaded the Global Ocean Alliance, bringing together countries from around the world to call for 30% of the world's oceans to be protected by 2030.





When announcing the alliance, then Environment Secretary Theresa Villiers¹¹ said: “The UK is taking a world-leading approach to marine conservation and is on track to safeguard nearly 50 per cent¹² of our precious marine habitats. But we are determined to go further”, echoing Michael Gove’s rhetoric that the UK’s MPA network symbolises the UK’s world leading marine protection standards.

METHODOLOGY

To assess the condition of the UK’s offshore MPA network, Greenpeace UK collated assessments of each offshore MPA’s ‘progress towards conservation targets’ as listed on the Joint Nature Conservation Committee’s (JNCC) MPA listings, which hold the most up to date public information on each MPA.¹³ The JNCC, funded by Defra, is an executive, non-departmental public body, and the statutory adviser to the government and to devolved UK administrations on matters of UK and international nature conservation.

These assessments of ‘progress towards conservation status’, which also include information on site condition monitoring, were compiled to provide an overview of the offshore MPA network’s progress.

The offshore MPAs’ conservation targets listed by the JNCC were originally set based on initial condition monitoring for each site, which assessed the condition of each protected feature before the MPAs were officially

designated. Where condition monitoring data was not available, targets were set based on ‘vulnerability assessments’, a ‘much lower confidence’ method of estimating site condition based on the likely exposure of protected features to human pressures.¹⁴

If a protected feature was deemed to be in ‘favourable’ condition at the time of condition monitoring / vulnerability assessment, the conservation objective would be to ‘maintain’ the feature in this favourable state. Where the protected feature was in ‘unfavourable’ condition, the conservation target is for the feature to be ‘restored’ or ‘recovered’. The results of the condition monitoring and vulnerability assessments for MPAs designated in England before 2019 are listed in the *Marine Protected Areas Network Report 2012-2018*.¹⁵

Most ‘progress towards conservation targets’ assessments are based on whether the site’s protected features were judged to be in favourable or unfavourable condition at the time of the condition monitoring / vulnerability assessment. Where they were in favourable condition at designation, it is generally assumed that they are progressing towards or already meeting their conservation targets (though this assessment is often made without long-term site condition monitoring following designation). Where the protected features were deemed in ‘unfavourable’ condition at designation, the government assumes they are ‘unlikely to be progressing’ towards conservation targets, again without long-term site condition monitoring.

A 2019 JNCC report¹⁶ on the current conservation status for UK offshore reefs, a commonly protected feature in offshore MPAs, states: “the results of the extent of physical damage... suggest that reefs are highly disturbed as a result of widespread fishing”. It concludes: ‘it is likely that the condition of reefs has deteriorated over the last 12 years’.

The JNCC came to a similar conclusion on the conservation status for offshore sandbanks, another commonly protected feature in offshore MPAs.¹⁷ A 2019 JNCC report states: “sandbanks are highly disturbed because of widespread fishing. Therefore it is likely that the condition of sandbanks would have declined over the last 12 years”.

Both of these examples imply that the assumption that MPAs which were in ‘favourable condition’ at the time of their original vulnerability assessments may be ‘moving towards conservation targets’ is flawed.

ANALYSIS OF FINDINGS

The following information was taken from the JNCC website’s MPA listings, and is accurate as of 8 July 2020.

According to the JNCC’s MPA listings, out of the 73 UK MPAs which are entirely or partially in offshore UK

waters, just five ‘may be’ moving towards or achieving their conservation targets based on the condition of the protected features at the time of initial vulnerability assessments or initial site condition monitoring. Of these five MPAs, just one (North-West Orkney) has long-term site condition monitoring available to make this assessment with confidence.

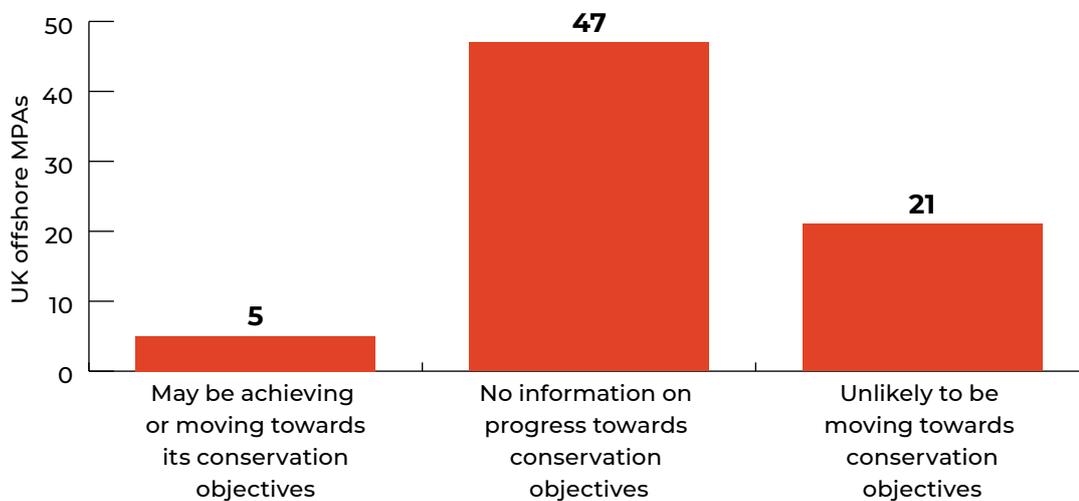
The five offshore MPAs which ‘may be’ moving towards or achieving their conservation targets are: Fulmar, North-East of Farnes Deep, North-West Orkney, Pisces Reef Complex and Swallow Sand.

21 of the UK’s offshore MPAs are ‘unlikely to be moving towards conservation targets’. There is no long-term site condition monitoring available for any of these 21 MPAs.

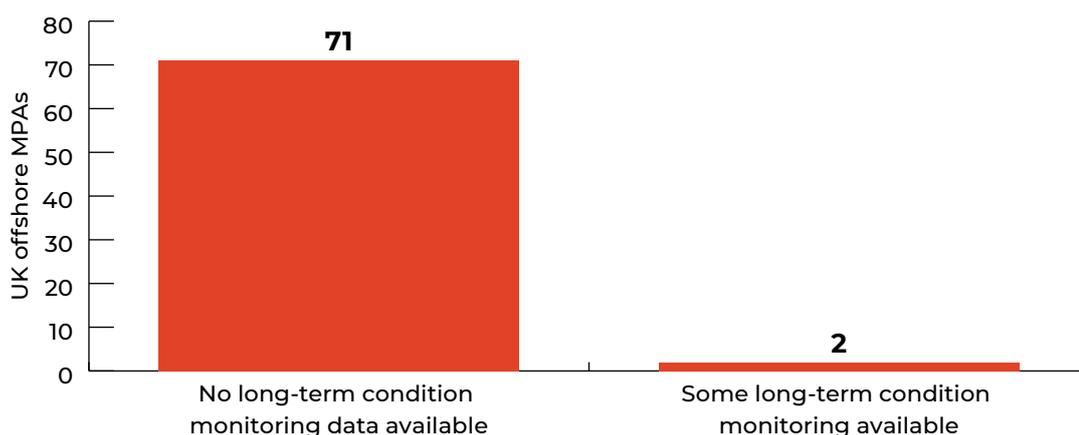
Of the remaining 47 offshore MPAs, there is no information on progress towards their conservation target listed by the JNCC.

Only two of the 73 offshore MPAs have long-term site condition monitoring available. These are: Skomer, Skokholm and the Seas off Pembrokeshire, and North-West Orkney. Without sufficient monitoring, the UK government cannot assess progress towards conservation targets for the remaining 71 MPAs with confidence.

Conservation Status of UK Offshore MPAs



Long-term site condition monitoring available in UK Offshore MPAs



In the North-West Orkney MPA, sand eels are the protected feature. Evidence from regular larval surveys undertaken between the 1950s and 2005 indicates that this MPA may already be achieving its conservation objectives.¹⁸ In the Skomer, Skokholm and the Seas off Pembrokeshire MPA, monitoring surveys were undertaken between 1999 and 2002, and in 2006 in order to assess the health of the seabird population, the protected feature of this MPA.¹⁹ Despite these monitoring surveys, there is no information available on progress towards conservation objectives for the site.

This analysis is reflective of a wider trend, both on land and at sea. Under Article 17 of the EU Habitats Directive, all EU member states are required to report on the implementation of this directive. In the 2019 report by the JNCC, covering all terrestrial and marine habitats,

the JNCC found that 62 out of 77 habitats were in 'bad condition', with just six in 'favourable condition'. With regard to protected species, 16 out of 93 species were found to be in 'bad condition'.²⁰

This study echoes a 2018 stocktake of England's MPA network, which concluded that the government, through lack of ambition and leadership, has failed to set up truly effective mechanisms to provide ecosystem based management of our seas.²¹

This investigation shows that the UK's offshore Marine Protected Areas are a collection of paper parks²², lines drawn on a map and announced with much fanfare, but with little management or regular site condition monitoring to ensure they are progressing towards their conservation targets.

Summary of UK Conservation Status and Trends in 2019

Overall Conservation Status and Trend	Species	Species Total	Habitats	Habitat Totals
Favourable-improving	11	33	2	6
Favourable-stable	19		4	
Favourable-deteriorating	0		0	
Favourable-unknown	3		0	
Inadequate-improving	1	24	2	8
Inadequate-stable	7		5	
Inadequate-deteriorating	9		0	
Inadequate-unknown	7		1	
Bad-improving	3	16	13	62
Bad-stable	3		26	
Bad-deteriorating	7		18	
Bad-unknown	3		5	
Unknown	20	20	1	1
Total	93	93	77	77

Summary of the conclusions and qualifiers reached for each habitat and species included in the Fourth UK Habitats Directive Report.²³

CHAPTER 2

DESTRUCTIVE FISHING IN OFFSHORE MPAS

Scientific studies consistently demonstrate²⁴ that fully protected MPAs, otherwise known as no-take zones, are in greater ecological health than those with only partial protection.²⁵ Stronger levels of protection and minimal human pressures can help boost species abundance, biomass and diversity.²⁶ This, in turn, improves overall ecosystem health, as well as providing fishing benefits to coastal communities.

The UK's offshore MPA network does not currently restrict fishing methods. This is in part due to the difficulty of imposing such regulations while part of the CFP. Consequently, a range of destructive fishing practices freely and legally take place within our MPAs. In Scotland, for example, government scientists recently concluded that trawling and dredging within the nation's MPAs are so prevalent, claims that they provide protection were described as 'misleading'.²⁷

We outline here three types of environmentally damaging fishing known to occur in UK offshore MPAs.

SAND EEL FISHERIES

The Dogger Bank MPA, situated in the North Sea, is the largest sandbank in UK waters.²⁸ This MPA was established to protect the sandbanks. There is no monitoring available to assess whether the site is progressing towards its conservation targets. It is home to a variety of species living on and within the sandy seabed sediment, including clams, hermit crabs, flatfish and sand eels. The area supports a high density of sand eels, which are a vital food source for breeding seabirds such as kittiwakes, various fish and harbour porpoises,²⁹ which for the later, the overlapping Southern North Sea MPA was set up to protect.³⁰

The majority of vessels fishing for sand eels are Danish. 84 boats were flagged to Denmark in 2009, and a further 33 to Norway.³¹ The current number of trawlers is now likely to be smaller due to fishing efficiency improvements, however. Some of these vessels comprise the Dogger Bank sand eel fishery. Scientists have discovered that this fishery, the most intensive in the North Sea, has harmed seabird populations by catching, and therefore depleting, a vital source of food for the birds.³² The fishery may also impact harbour porpoises.³³

Danish boats control 94% of quota for sand eels caught in UK waters, with most of their catch crushed into fishmeal for salmon, mink and livestock farms.³⁴



©Greenpeace/Cleizes

The Royal Society for the Protection of Birds (RSPB) highlights a study suggesting that increased sand eel fishing intensity leads to lower numbers of kittiwake chicks being produced.³⁵

Analysis following the closure of a sand eel fishery off the coast of eastern Scotland in 2000 suggests that closure both increased sand eel abundance and the breeding success of kittiwakes.³⁶ Despite the evident threat to seabirds, 2020 quotas for the Danish sand eel fleet were doubled,³⁷ allowing them to fish sand eels in greater volumes, including within the Dogger Bank MPA.

ELECTRIC PULSE FISHING

Dogger Bank's MPA status has also failed to protect it from electric pulse trawling.³⁸ The technique involves pulling an electrode loaded net through the water, producing an electric current that shocks fish from the seafloor and into the trawler net. Flat fish such sole and plaice can be caught in this way.

Studies demonstrate the highly destructive nature of this fishing method, causing fractured spines in non-target fish, weakening the immune systems of worms and shrimp³⁹ and reducing hatching rates of cod eggs.⁴⁰ Though little is known about the long term impacts of ecosystems following a period of electric pulse trawling, British fishers have compared the North Sea to a 'graveyard'⁴¹ in areas recently pulse trawled.

Technically, this method has been prohibited in Europe for many years, but increasing numbers of vessels have been granted electric pulse trawling licenses for scientific research purposes. Of the 84 vessels operating in European waters between 2015 and 2018, eight were allegedly observed fishing in the Dogger Bank MPA.⁴² Last year, the European Parliament agreed to ban the practice by mid-2021, allowing member states to immediately restrict pulse trawling within coastal waters.⁴³ The UK government has committed to prohibiting pulse trawling in UK waters post-Brexit.⁴⁴

PAIR TRAWLING

Pair trawling involves two boats dragging a net between them, enabling the use of much larger nets. These nets can span up to a quarter mile wide and a quarter mile long.⁴⁵ Pelagic fish, like seabass, mackerel and pollack are amongst those targeted.

Pair trawling is associated with high levels of bycatch. This is the incidental capture of non-target species such as dolphins, turtles or seabirds, which are often discarded overboard while dying or dead.⁴⁶ All fishing involves some degree of bycatch.

Due to bycatch, the UK government banned pair trawling for seabass within twelve nautical miles of the British coast in 2005.⁴⁷ However, since the ban, French vessels (approximately 30 in 2011) have continued to legally pair trawl for seabass in offshore areas of the Channel.⁴⁸ Marine Traffic vessel tracking data demonstrates that some of these vessels fish within UK MPAs. For example, La Perouse, a French vessel known to have pair trawling gear, has legally fished extensively within the South West Deeps (East) MPA over the past year.⁴⁹



CHAPTER 3

CASE STUDY: SUPERTRAWLERS IN OFFSHORE MPAS

SUPERTRAWLERS: A DEFINITION

In one of the most egregious examples of industrial fishing taking place in protected areas, Greenpeace has regularly observed supertrawlers fishing in MPAs.

Supertrawlers are large fishing ships, typically with freezing and processing facilities on board, allowing

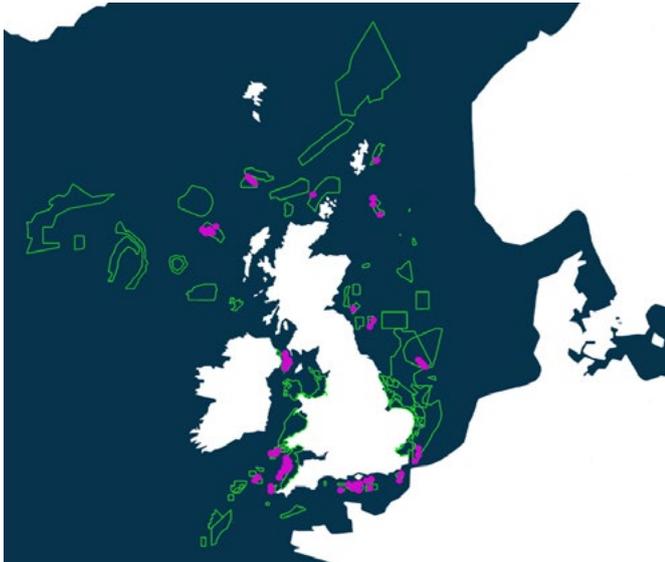
them to catch huge volumes of fish and to remain at sea for long periods. While there is no universal definition of a supertrawler, this report defines supertrawlers as being over 100m in length, a definition commonly used in the UK media.⁵⁰



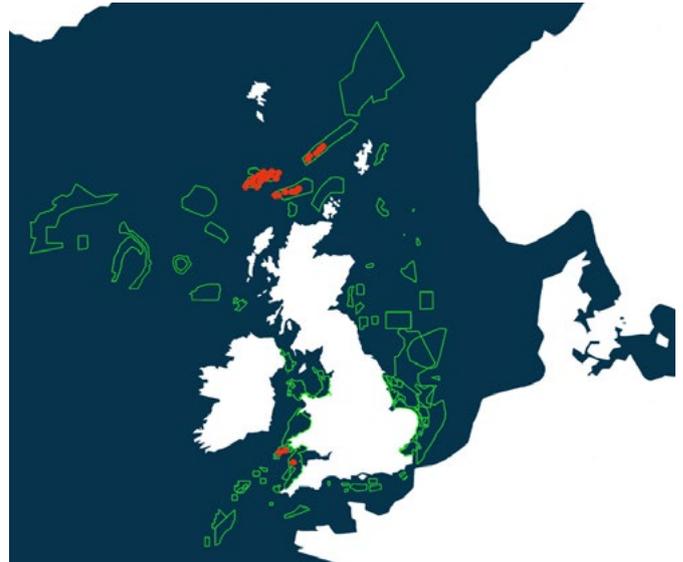


Name	Length	Gross Tonnage (deadweight)	Flag	Beneficial Ownership
Annelies Ilena	144.6m	14,055t (11500)	Poland	Atlantex Spolkas ZOO (Parlevliet & van der Plas managed)
Margiris	142.7m	9,449t (6200)	Lithuania	Parlevliet & van der Plas
Willem van der Zwan	142.3m	9375t (8720)	Netherlands	Willem van der Zwan en Zonen
Maartje Theadora	140.8m	9,082t (9138)	Germany	Parlevliet & Van Der Plas
Afrika	126.0m	7,005t (6400)	Netherlands	Cornelis Vrolijk Holding B.V
Carolien	125.0m	6,910t (6450)	Netherlands	Cornelis Vrolijk Holding B.V
Arctica	120.7m	7,765t (3372)	Russia	Arkhangelsk Trawl Fleet
Yantarnyy	120.7m	7,765t (4067)	Russia	Murmansk Trawl Fleet Joint Stock Company
Karelia	120.7m	7,765t (4102)	Russia	Arkhangelsk Trawl Fleet
Baltiyskaya Kosa	120.4m	7,765t (3372)	Russia	Kaichuang Deep Sea Fisheries
Kurskaya Kosa	120.4m	7,765t (3372)	Russia	Sea Star Company Limited
Lira	120.4m	7,765t (3372)	Russia	Sea Star Company Limited
Pavel Kutakhov	120.4m	7,765t (3933)	Russia	Murmansk Trawl Fleet Joint Stock Company
Frank Bonefaas	119.0m	6,512t (5750)	UK	Cornelis Vrolijk Holding B.V
Helen Mary	116.7m	7,278t (7000)	Germany	Parlevliet & Van Der Plas
Mekhanik Sergey Agapov	114.9m	8,210t (7641)	Russia	Robinzon Limited
Zeeland	113.97m	6,128t (5162)	Netherlands	Cornelis Vrolijk Holding B.V
Kapitan Demidenko	105.0m	7,682t (5460)	Russia	Murmansk Trawl Fleet Joint Stock Company
Kapitan Nazin	105.0m	7,665t (5455)	Russia	Murmansk Trawl Fleet Joint Stock Company
Kapitan Sulimov	104.5m	4,407t (1810)	Russia	Kapitan Joint Stock Company
Lazurnyy	104.5m	4,407t (1810)	Russia	Zao Westrybflot Joint Stock Company
Valeriy Dzhaparidze	104.5m	4,407t (1810)	Russia	For Group
Zamoskvorechye	104.5m	4,407t (1810)	Russia	Zao Westrybflot Joint Stock Company
Naeraberg	103.9m	5,099t (3400)	Faroe Islands	Parlevliet & Van Der Plas

All instances of the supertrawler *Afrika* fishing in UK offshore MPAs in 2019 (Approx. 93 hours total)



All instances of the supertrawler *Annelies Ilena* fishing in UK offshore MPAs in 2019 (Approx. 142 hours total)



CHARTING THE SUPERTRAWLERS

Greenpeace analysed the AIS (Automatic Identification System) tracking data for all 25 supertrawlers fishing in UK waters in 2019. Sourced from Lloyd's List Maritime Intelligence, these tracks were laid across the UK's MPA network in order to find out when, and for how long, these ships were operating in UK offshore MPAs.

Greenpeace then assessed how often these boats were in offshore MPAs and underway at under four knots, a speed which strongly implies fishing activity. This was cross-checked with instances where the navigation status was broadcast as 'engaged in fishing'.

There were 25 supertrawlers active in UK waters in 2019, collectively spending 2,963 hours fishing in UK MPAs. This amounts to 123 days of continuous fishing activity. Fishing activity increased from 1,388 hours in 2018.

In 2019, the nine EU flagged supertrawlers operating in UK waters spent a total of 1,120 hours fishing in UK MPAs. The sixteen non-EU flagged supertrawlers active in UK waters spent 1,843 hours fishing in UK MPAs in 2019. Fifteen of these non-EU flagged supertrawlers are Russian flagged and owned, while the remaining vessel is Faroe Islands flagged and under Dutch ownership. These supertrawlers have access to EU quota through agreements between the European Union and the Russian Federation, and between the European Union and the Faroe Islands, respectively. None of the supertrawlers that operate in UK waters are UK owned. One is UK flagged (the *Frank Bonefaas*), but under Dutch ownership.

In 2019, supertrawlers were observed fishing in 39 of the UK's 73 offshore MPAs. The MPA worst affected by supertrawlers in 2019 was the Wyville Thomson Ridge (west of Shetland and south of the Faroe Islands). The area was designated an MPA in 2017 to protect a reef. According to the JNCC, this MPA is unlikely to be progressing towards its conservation targets, and it

All instances of the supertrawler *Margiris* fishing in UK offshore MPAs in 2019 (Approx. 98 hours total)



All instances of the supertrawler *Willem Van Der Zwan* fishing in UK offshore MPAs in 2019 (Approx. 437 hours total)



lacks long-term site condition monitoring. This was by far the most heavily fished MPA by supertrawlers because of the concentration of Russian supertrawler activity inside and around it.

Russian supertrawlers are legitimately operating in the MPA with the authority of the Faroese government. Dr Jean-Luc Solandt, a biologist at the Marine Conservation Society, stated in 2020 that their presence 'highlights the uselessness of our offshore marine protected areas whether for recovery of fish, seabed habitats, or to help restore carbon'.⁵¹

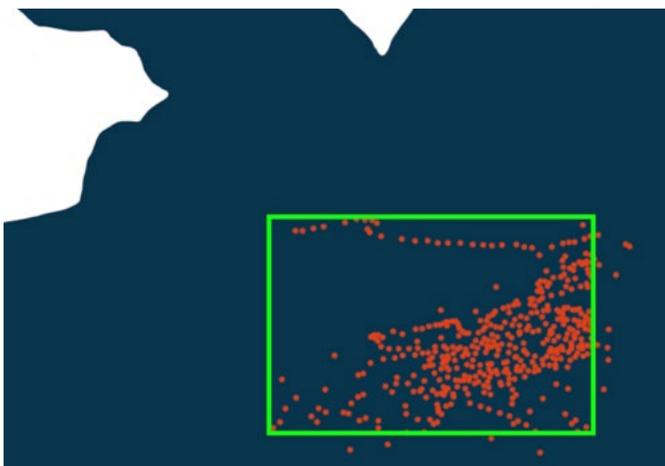
The Geikie Slide & Hebridean Slope and Offshore Overfalls MPAs were the next most severely affected. Both protect ecologically important features of the seabed. The Margiris supertrawler is the world's second largest, and was previously banned from operating in Australian waters for two years when sailing under the name Abel Tasman. The majority of fishing hours observed in the Offshore Overfalls MPA, situated in the English Channel, are attributed to this supertrawler.⁵²

The Southern North Sea MPA, established to protect harbour porpoises, was also significantly affected. Porpoises hunt for similar species to those caught by pelagic fishing vessels, including supertrawlers. As such, porpoises can be caught as bycatch: 1,105 porpoises died in fishing nets of various gear types in 2019.⁵³ According to *The Article 17 Habitats Directive Report 2019*, between 2000 and 2017, bycatch was the second most common killer of harbour porpoises, at 17%.⁵⁴ Supertrawlers have also been recorded fishing in the Bristol Channel Approaches MPA, which was specifically designated to protect this species.

WHY SUPERTRAWLERS ARE BAD FOR THE MARINE ENVIRONMENT

The supertrawlers observed fishing in UK offshore MPAs are all pelagic midwater trawlers, which target and catch pelagic species like herring, blue whiting and mackerel. Pelagic fish inhabit the 'pelagic zone': the water column of the open ocean between the coast and ocean floor.⁵⁵ The net is towed through this zone for a considerable

All instances of supertrawlers fishing in the Offshore Overfalls MPA in 2019 (off the south coast)



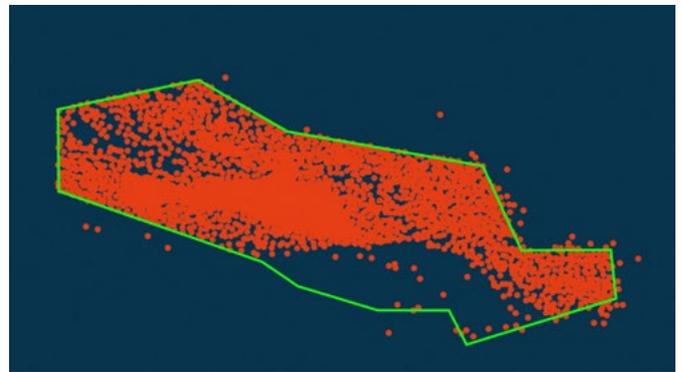
distance until it's full of fish. Instead of hauling the nets in, the sheer quantities of fish caught mean the catch has to be pumped on board.⁵⁶

Supertrawlers use gigantic trawl nets, up to 600m long. This enables them to catch huge quantities of fish to be frozen on board; several of the vessels in this study are capable of storing close to 6,000 tonnes of frozen fish.⁵⁷ Boats with such huge catch capacity drive the over-exploitation of fish stocks.

Despite the legal obligation under the CFP to end overfishing by 2020, the European Union continues to set Total Allowable Catches (TACs) above the limits recommended by scientists.⁵⁸ The 2020 TACs for North East Atlantic herring and whiting, which are among stocks targeted by supertrawlers, were set in excess of scientific advice for a number of International Council for the Exploration of the Sea (ICES) fishing areas, including some areas that overlap with UK coastal waters.⁵⁹

The New Economics Foundation calculated that capping catches to comply with scientific advice could increase landings by 45%.⁶⁰ This would support an additional 2,400 full-time equivalent jobs across the UK coast. Setting catch quotas at an even more precautionary level could still yield significant employment benefits. Restricting supertrawler activity in MPAs would amount to a significant first step towards compliance,

All instances of supertrawlers fishing in the Wyville Thomson Ridge MPA in 2019 (west of Shetland and south of the Faroe Islands)



All instances of supertrawlers fishing in the Southern North MPA in 2019 (off the east coast)



providing vulnerable fish populations with a protected environment in which to recover.

It's concerning that vessels which have overfished around the world are freely and legally operating in areas intended to protect vulnerable marine ecosystems. The Frank Bonefaas was convicted in 2015 for illegally catching 632,000 kilos of mackerel from the 'Mackerel Box':⁶¹ a large protected area off the South West coast of England, established to reduce fishing of young mackerel stocks.⁶² Yet the supertrawler continues to fish within UK MPAs.

Defenders of supertrawlers in MPAs argue that because they are pelagic (operating in midwater), they do not damage the protected features of most of the MPAs they operate in, particularly those established to conserve seabed ecosystems. It is true that supertrawlers' gear type does not directly affect the seabed, but this defence ignores the scientifically demonstrated benefits of fully vs partially protected marine areas.⁶³ Ecosystems, by definition, comprise a number of interconnected parts. It is inconceivable that a disturbance to one aspect, such as an industrial midwater trawler catching large volumes of fish, won't impact other parts.

All fishing involves some degree of bycatch. Even though pelagic fisheries tend to have less bycatch than higher impact fishing, such as bottom-trawling, some environmental groups have gathered anecdotal accounts directly linking marine mammal strandings to supertrawlers.⁶⁴ Furthermore, small scale fishers have blamed dolphin deaths on supertrawlers.⁶⁵

Supertrawler companies claim their bycatch is minimal due to the mitigation measures they undertake. However, a 2016 Australian Senate Committee Report, which considered the risks of allowing supertrawlers access to pelagic fisheries, concluded:

The use of excluder devices and other mitigation techniques cannot address the fundamental problem; namely, that the massive net towed [...] means the vessel cannot target its quota species selectively. Avoiding mortalities of protected species and the bycatch of other species, including species highly valued by other fishing interests, is impossible.⁶⁶

With industrial fishing at this scale, even a very low percentage of bycatch amounts to a wealth of sea life being unnecessarily caught. Jeremy Percy, Director of the New Under 10s Fisherman's Association, said of the risks of supertrawlers:

"Whilst not all big is bad nor all small beautiful, the immense fishing power of the modern fleet of supertrawlers has the capacity to do immense damage to the marine environment in a very short time..."

"Like any other sector, fishermen are generally law abiding but there will always be some that push the line too far. If you are over 400 feet long and have a 10,000 horsepower main engine and nets the size of football



© Greenpeace/Aslund

fields you can very easily have a devastating effect on species and habitats."

These risks appear more serious when considering a recent government paper on offshore MPA management, where the JNCC notes that there is uncertainty around the impact of fishing activity on habitats, particularly those offshore, where issues of 'availability of evidence are most acute'.⁶⁷ When facing such levels of uncertainty, and with the health of fragile ecosystems at stake, it is vital that the precautionary principle is applied. Potentially damaging activities, such as industrial fishing, must be banned from MPAs.

Industrial boats pose threats to the wider ecosystem beyond their fishing methods. According to Lloyd's List Maritime Intelligence data, the supertrawlers assessed in this report have been recorded as suffering various mechanical failures at sea, including: lost or tangled fishing gear, explosions, fires and collisions. For example, in 2018, the Pavel Kutakhov supertrawler suffered a fire, causing casualties. For data from 2015-2020, see annexe 5.

WHY SUPERTRAWLERS ARE BAD FOR COASTAL COMMUNITIES

Despite catching huge volumes of fish, supertrawlers don't land their catch in the UK. As such, they provide little to no economic benefit to the UK's coastal communities. This contrasts sharply with the lower impact under 10 metre fleet. These vessels land 99% of their catch in UK ports.⁶⁸ 77% of the UK fleet are vessels under ten metres, yet they control less than 4% of the fishing quota.⁶⁹ This demonstrably inequitable quota system not only disadvantages small scale fishers, but also has wider implications for the UK food system.

The UK's under 10 metre fleet holds minimal quota for species that are popular domestically, meaning local livelihoods largely rely on supplying foreign markets. Astonishingly, 70% of the seafood consumed in the UK is imported, while 80% of the UK catch is exported to the EU, Asia and the USA.⁷⁰ Such an overreliance upon global markets makes UK fishers more vulnerable to supply chain disruption, as highlighted by the severe impact of the COVID-19 pandemic upon them,⁷¹ thus making the UK less food secure.

CHAPTER 4

RECOMMENDATIONS

Greenpeace envisions a future where at least a third of the world's oceans are fully protected by 2030, with the rest sustainably managed. Scientific research states that this is the minimum required to restore our oceans back to health and safeguard them from future threats. The UK must play a world-leading role in efforts to achieve this.

IMPLEMENT 30X30 DOMESTICALLY

As this report has established, the designation of MPA status alone does not protect our marine ecosystems from destructive fishing practices. Currently, our offshore MPAs amount to little more than a network of paper parks, that are just lines on a map. It's little wonder that only a small minority of them are making progress towards meeting their conservation objectives.

Industrial fishing vessels inside protected areas are a threat to fragile ecosystems and hinder the recovery of fish populations, to the detriment of the livelihoods of local fishers and their coastal communities.

The UK government must put a stop to this damaging practice **by banning destructive fishing, beginning with supertrawlers from MPAs.**

Post-Brexit, the UK will have renewed powers to do this as an independent coastal state. As a minimum, the government will have to fulfil any ongoing obligations under the EU Habitats Directive, which will be possible to enforce in offshore MPAs once free of the Common Fisheries Policy⁷². But the government must go further by ensuring that powers to strengthen environmental protections are retained during Brexit talks, and put them to immediate good use by banning supertrawlers and other high impact fishing from MPAs, while still allowing other countries to access UK waters.

Banning supertrawlers from offshore MPAs would be an important first step towards properly protecting our marine ecosystems. But we must go further still, and **designate a network of fully or highly protected MPAs, which are off limits to all extractive activity, across at least 30% of our waters.** The remainder must



be sustainably managed. Defra recently published a review of Highly Protected Marine Areas (HPMAs), recommending that the government introduce HPMAs into the existing MPA network, beginning with initial pilot sites.⁷³ While this is to be welcomed, it is important that these recommendations not only become a reality, but grow in ambition to make at least 30% of UK waters fully or highly protected by 2030.

ADVOCATE FOR 30X30 ON THE WORLD STAGE

The UK government cites aspirations to see 30% of the world's oceans protected by 2030, yet is currently failing to properly protect our waters at home. This gap between rhetoric and action damages the UK's credibility on the world stage, and undermines contributions to international negotiations.

The UK backs this international target, and has convened the Global Ocean Alliance of countries that also support it. Governments have the opportunity to agree on the 30x30 target at the fifteenth meeting of the conference of parties to the UN Convention of Biological Diversity (CBD), but will only do so if supportive countries can work together to collectively raise ambition.

The 30x30 global target can only be met if countries can also **agree on a new Global Ocean Treaty at the UN. A strong treaty will fix the broken system of international ocean governance and provide the mechanism for placing at least 30% of the global oceans off-limits to human activity.** But like the CBD, an ambitious agreement will only be reached if supportive countries can collaborate to overcome those seeking to dampen ambition.

By implementing stronger protections in UK waters, the UK government can better advocate for increased global ocean protection, and play a key role in the final round of Global Ocean Treaty negotiations and the CBD.

REDISTRIBUTE QUOTA MORE FAIRLY AND SUSTAINABLY

As well as Brexit providing new powers over our offshore MPAs, the UK will also assert further control over fishing opportunities in its domestic waters.

The current distribution of UK fishing opportunities is inequitable, and does not prioritise environmental, social or local economic factors. Current quotas are based on historical catch levels. This significantly favours larger boats over small scale fishers, which make up the majority of the UK fleet.

Once the UK leaves the CFP, fishing will be regulated by the new Fisheries Bill. **The Fisheries Bill is a once-in-a-generation opportunity to enshrine a fairer and more sustainable quota system, based on environmental, social and local economic criteria.** This can be delivered



Minister for the Environment, Rebecca Pow, speaking about the importance of ocean protection at a Greenpeace Protect the Oceans event in January 2020

by the UK government and devolved administrations regardless of the outcome of Brexit negotiations. Such criteria, developed through stakeholder consultation, would incentivise more sustainable behaviour across all fishing fleets and could include:

- Ecosystem damage, including, but not limited to, direct seabed impacts (damage to seabed species, food chain disruption and impacts on top predators), sediment coating and seabird population impacts
- Selectivity of target and non-target species (bycatch, including material)
- Greenhouse gas emissions: CO₂/kg landed weight
- Bycatch
- Provision of jobs both direct and indirect: jobs/kg landed weight
- Influence on local tourism
- Maintaining culture, traditions and communities
- Encouraging investment in infrastructure (benefiting communities as well as fishers)
- Provision of food to local consumers

The high court, in dismissing a legal challenge to quota reallocation, has acknowledged that fish are a “public resource”⁷⁴ Now the Government must act decisively to secure this public benefit for generations.

CHAPTER 5

CONCLUSION

The UK government has laudable aims to deliver world-leading marine protections.

In a statement on 16 May 2020, Defra noted: 'As a responsible independent coastal state, we want our fisheries managed in a way that the rest of the world will want to follow - one that protects our precious marine and coastal areas while enabling our seafood sector to thrive'.⁷⁵

But this investigation demonstrates that the UK network of offshore marine protected areas is failing to deliver. The majority of offshore MPAs aren't progressing towards their conservation targets, while supertrawlers and other destructive fishing vessels can freely operate within them. This is far from the world-class standards the

government aspires to, nor is it how a 'public resource'⁷⁶ should be managed for the benefit of everyone.

Brexit (irrespective of one's views), and repatriated powers from leaving the European Union and Common Fisheries Policy, present a historic opportunity to turn things around. If the government places sustainability and environmental protection at the heart of a post-Brexit agreement, it will be possible to improve standards across the offshore MPA network. If not, then the broken system of paper parks is likely to continue, leaving vulnerable ocean ecosystems under threat and undermining the government's international efforts to advocate for increased ocean protection. The coming months are crucial to the future health of the UK and the world's marine environment. The government must act now.



ANNEXES

ANNEXE 1 – CONSERVATION STATUS AND CONDITION MONITORING OF UK OFFSHORE MPAS

Site name	Conservation Status	Ongoing Site Monitoring
Anton Dohrn Seamount	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Bassurelle Sandbank	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Braemar Pockmarks	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Bristol Channel Approaches / Dynesfeydd Môr Hafren	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Cape Bank	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Central Fladen	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Croker Carbonate Slabs	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Darwin Mounds	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Dogger Bank	No information on progress towards conservation objectives	No long-term condition monitoring data is available
East of Gannet and Montrose Fields	No information on progress towards conservation objectives	No long-term condition monitoring data is available
East of Haig Fras	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
East of Start Point	No information on progress towards conservation objectives	No long-term condition monitoring data is available
East Rockall Bank	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Farnes East	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Faroe-Shetland Sponge Belt	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Firth of Forth Banks Complex	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Fulmar	May be achieving or moving towards its conservation objectives	No long-term condition monitoring data is available
Geikie Slide and Hebridean Slope	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Greater Haig Fras	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Greater Wash	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Haig Fras	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Haisborough, Hammond and Winterton	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Hatton Bank	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available

Site name	Conservation Status	Ongoing Site Monitoring
Hatton-Rockall Basin	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Holderness Offshore	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Inner Bank	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Inner Dowsing, Race Bank and North Ridge	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Irish Sea Front	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Kentish Knock East	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Liverpool Bay / Bae Lerpwl	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Markham's Triangle	No information on progress towards conservation objectives	No long-term condition monitoring data is available
North Anglesey Marine / Gogledd Môn Forol	No information on progress towards conservation objectives	No long-term condition monitoring data is available
North Channel	No information on progress towards conservation objectives	No long-term condition monitoring data is available
North East of Farnes Deep	May be achieving or moving towards its conservation objectives	No long-term condition monitoring data is available
North Norfolk Sandbanks and Saturn Reef	No information on progress towards conservation objectives	No long-term condition monitoring data is available
North West Rockall Bank	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
North-east Faroe-Shetland Channel	No information on progress towards conservation objectives	No long-term condition monitoring data is available
North-East of Haig Fras	No information on progress towards conservation objectives	No long-term condition monitoring data is available
North-West of Jones Bank	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
North-west Orkney	May be achieving or moving towards its conservation objectives	Some long-term condition monitoring available
Norwegian Boundary Sediment Plain	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Offshore Brighton	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Offshore Overfalls	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Orford Inshore	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Outer Thames Estuary	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Pisces Reef Complex	May be achieving or moving towards its conservation objectives	No long-term condition monitoring data is available
Pobie Bank Reef	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Queenie Corner	No information on progress towards conservation objectives	No long-term condition monitoring data is available

Site name	Conservation Status	Ongoing Site Monitoring
Rosemary Bank Seamount	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Scanner Pockmark	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro	No information on progress towards conservation objectives	Some long-term condition monitoring available
Solan Bank Reef	No information on progress towards conservation objectives	No long-term condition monitoring data is available
South Dorset	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
South of Celtic Deep	No information on progress towards conservation objectives	No long-term condition monitoring data is available
South of the Isles of Scilly	No information on progress towards conservation objectives	No long-term condition monitoring data is available
South Rigg	No information on progress towards conservation objectives	No long-term condition monitoring data is available
South West Approaches to the Bristol Channel	No information on progress towards conservation objectives	No long-term condition monitoring data is available
South West Deeps (East)	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Southern North Sea	No information on progress towards conservation objectives	No long-term condition monitoring data is available
South-West Deeps (West)	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Stanton Banks	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Swallow Sand	May be achieving or moving towards its conservation objectives	No long-term condition monitoring data is available
The Barra Fan and Hebrides Terrace Seamount	No information on progress towards conservation objectives	No long-term condition monitoring data is available
The Canyons	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Turbot Bank	No information on progress towards conservation objectives	No long-term condition monitoring data is available
West of Copeland	No information on progress towards conservation objectives	No long-term condition monitoring data is available
West of Walney	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
West of Wight-Barfleur	No information on progress towards conservation objectives	No long-term condition monitoring data is available
West Shetland Shelf	No information on progress towards conservation objectives	No long-term condition monitoring data is available
West Wales Marine / Gorllewin Cymru Forol	No information on progress towards conservation objectives	No long-term condition monitoring data is available
Western Channel	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Wight-Barfleur Reef	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available
Wyville Thomson Ridge	Unlikely to be moving towards its conservation objectives	No long-term condition monitoring data is available

ANNEXE 2 - EU SUPERTRAWLERS TIME SPENT FISHING IN UK OFFSHORE MPAS IN 2019

Vessel & MPA	Sum of time fishing (hours, minutes, seconds)
Afrika	93:05:53
Bristol Channel Approaches / Dynesfeydd Mîç½r Hafren	9:02:24
Cape Bank	1:04:10
Central Fladen	14:08:03
Darwin Mounds	3:41:19
Dogger Bank	0:51:30
East of Haig Fras	0:10:07
Firth of Forth Banks Complex	0:14:09
Geikie Slide and Hebridean Slope	29:09:51
Inner Bank	0:30:20
North Channel	3:34:42
North East of Farnes Deep	3:55:07
Offshore Brighton	0:30:36
Offshore Overfalls	2:32:05
Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro	8:04:36
South West Approaches to the Bristol Channel	8:44:57
Southern North Sea	1:41:59
West of Wight-Barfleur	0:43:20
Wight-Barfleur Reef	4:26:38
Anneliesllena	142:39:21
Bristol Channel Approaches / Dynesfeydd Mîç½r Hafren	0:11:42
Darwin Mounds	54:31:02
Faroe-Shetland Sponge Belt	26:52:45
Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro	1:43:01
Wyville Thomson Ridge	59:20:51
Carolien	36:59:58
Bristol Channel Approaches / Dynesfeydd Mîç½r Hafren	1:23:00
Central Fladen	1:03:25
North East of Farnes Deep	8:15:23
Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro	0:21:41
Southern North Sea	2:01:11
The Canyons	1:49:29
Wyville Thomson Ridge	22:05:49

Vessel & MPA	Sum of time fishing (hours, minutes, seconds)
Frank Bonefaas	21:03:03
Central Fladen	4:55:15
Farnes East	3:18:14
Offshore Overfalls	5:52:48
Wyville Thomson Ridge	6:56:46
Helen Mary	57:56:56
Central Fladen	4:09:07
Geikie Slide and Hebridean Slope	43:58:45
North-west Orkney	0:00:11
The Barra Fan and Hebrides Terrace Seamount	0:37:19
West Shetland Shelf	3:31:22
Wyville Thomson Ridge	5:40:12
Maartje Theodora	169:46:18
Central Fladen	1:16:59
Farnes East	2:42:10
Faroe-Shetland Sponge Belt	13:18:09
Geikie Slide and Hebridean Slope	33:28:47
North East of Farnes Deep	37:23:35
North-east Faroe-Shetland Channel	4:22:49
Pobie Bank Reef	0:50:04
Southern North Sea	16:44:30
West Shetland Shelf	15:39:56
Wyville Thomson Ridge	43:59:19
Margiris	98:48:04
Bassurelle Sandbank	0:10:10
Inner Bank	1:00:31
Offshore Brighton	6:06:37
Offshore Overfalls	69:38:56
South Dorset	6:53:02
Wight-Barfleur Reef	14:58:48
Willem Van Der Zwan	437:39:47
Bassurelle Sandbank	0:02:27
Bristol Channel Approaches / Dynesfeydd Mîz ¹ / ₂ r Hafren	10:23:37
Cape Bank	0:50:50
Central Fladen	4:29:00
Darwin Mounds	4:00:02
Faroe-Shetland Sponge Belt	27:27:14
Geikie Slide and Hebridean Slope	120:34:57
Greater Haig Frs	0:03:00
Inner Bank	1:48:01

Vessel & MPA	Sum of time fishing (hours, minutes, seconds)
North East of Farnes Deep	1:45:00
North Norfolk Sandbanks and Saturn Reef	1:09:00
North-east Faroe-Shetland Channel	14:53:55
Offshore Brighton	7:55:44
Offshore Overfalls	28:03:05
Rosemary Bank Seamount	5:18:16
Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro	4:39:14
South West Approaches to the Bristol Channel	0:31:00
South West Deep (East)	0:27:00
Southern North Sea	30:45:17
South-West Deep (West)	3:12:00
Swallow Sand	9:38:26
The Barra Fan and Hebrides Terrace Seamount	12:18:01
Turbot Bank	0:27:02
West of Wight-Barfleur	0:30:02
West Shetland Shelf	8:36:07
West Wales Marine / Gorllewin Cymru Forol	0:07:51
Wight-Barfleur Reef	3:55:01
Wyville Thomson Ridge	133:48:38
Zeeland	62:11:52
Geikie Slide and Hebridean Slope	42:26:12
North East of Farnes Deep	3:45:30
Offshore Overfalls	0:36:23
Southern North Sea	8:22:08
The Barra Fan and Hebrides Terrace Seamount	1:38:01
Wyville Thomson Ridge	5:23:38
Grand Total	1120:11:12

ANNEXE 3 - NON-EU SUPERTRAWLERS TIME SPENT FISHING IN UK OFFSHORE MPAS IN 2019

Vessel & MPA	Sum of time fishing (hours, minutes, seconds)
Arctica	45:44:02
Wyville Thomson Ridge	45:44:02
Baltiyskaya Kosa	157:17:13
East Rockall Bank	0:30:02
Wyville Thomson Ridge	156:47:11
Bratya Stoyanov	134:59:10
Wyville Thomson Ridge	134:59:10
Kapitan Demidenko	140:48:13
East Rockall Bank	0:12:04
North West Rockall Bank	2:33:00
Wyville Thomson Ridge	138:03:09
Kapitan Nazin	96:15:37
North West Rockall Bank	1:51:00
Wyville Thomson Ridge	94:24:37
Kapitan Sulimov	29:24:24
Wyville Thomson Ridge	29:24:24
Karelia	11:43:16
East Rockall Bank	1:33:05
Wyville Thomson Ridge	10:10:11
Kurskaya Kosa	139:20:48
East Rockall Bank	0:49:56
Wyville Thomson Ridge	138:30:52
Lazurnyy	264:37:21
North West Rockall Bank	0:39:39
Wyville Thomson Ridge	263:57:42
Lira	115:27:38
Wyville Thomson Ridge	115:27:38
Mekhanik Sergey Agapov	21:03:03
Central Fladen	4:55:15
Farnes East	3:18:14
Offshore Overfalls	5:52:48
Wyville Thomson Ridge	6:56:46
Naeraberg	38:14:59
Darwin Mounds	0:40:10
Wyville Thomson Ridge	37:34:49

Vessel & MPA	Sum of time fishing (hours, minutes, seconds)
Pavel Kutakhov	24:38:46
Wyville Thomson Ridge	24:38:46
Valeriy Dzhaparidze	173:47:50
Wyville Thomson Ridge	173:47:50
Yantarnyy	144:21:47
Darwin Mounds	4:09:21
Wyville Thomson Ridge	140:12:26
Zamoskvoreche	305:56:40
Wyville Thomson Ridge	305:56:40
Grand Total	1843:40:47

ANNEXE 4 - TOTAL FISHING TIME BY SUPERTRAWLERS IN EACH OFFSHORE MPA IN 2019

MPA	Sum of time fishing (hours, minutes, seconds)
Wyville Thomson Ridge	2093:51:26
Geikie Slide and Hebridean Slope	269:38:12
Offshore Overfalls	112:36:05
Faroe-Shetland Sponge Belt	67:38:08
Darwin Mounds	67:01:54
Southern North Sea	59:35:05
North East of Farnes Deep	55:04:35
Central Fladen	34:57:04
West Shetland Shelf	27:47:25
Wight-Barfleur Reef	23:20:27
Bristol Channel Approaches / Dynesfeydd Mîl ½r Hafren	21:00:43
North-east Faroe-Shetland Channel	19:16:44
Skomer, Skokholm and the Seas off Pembrokeshire / Sgomer, Sgogwm a Moroedd Penfro	14:48:32
The Barra Fan and Hebrides Terrace Seamount	14:33:21
Offshore Brighton	14:32:57
Swallow Sand	9:38:26
Farnes East	9:18:38
South West Approaches to the Bristol Channel	9:15:57
South Dorset	6:53:02
Rosemary Bank Seamount	5:18:16
North West Rockall Bank	5:03:39
North Channel	3:34:42
Inner Bank	3:18:52
South-West Deeps (West)	3:12:00
East Rockall Bank	3:05:07
Cape Bank	1:55:00
The Canyons	1:49:29
West of Wight-Barfleur	1:13:22
North Norfolk Sandbanks and Saturn Reef	1:09:00
Dogger Bank	0:51:30
Pobie Bank Reef	0:50:04
Turbot Bank	0:27:02
South West Deeps (East)	0:27:00
Firth of Forth Banks Complex	0:14:09
Bassurelle Sandbank	0:12:37
East of Haig Fras	0:10:07
West Wales Marine / Gorllewin Cymru Forol	0:07:51

MPA	Sum of time fishing (hours, minutes, seconds)
Greater Haig Fras	0:03:00
North-west Orkney	0:00:11
Grand Total	2963:51:59

ANNEXE 5 - INCIDENTS ON SUPERTRAWLERS (DATA TAKEN FROM LLOYDS REGISTER - 2015 ONWARDS) (DATA TAKEN FROM LLOYDS REGISTER)

Vessel name	Incident date	Incident type	Incident location	Cause of Incident	Beneficial owner
Willem van der Zwan	09 Mar 2016	Casualties	British Isles, North Sea, English Channel, Bay of Biscay	Machinery damage/failure (e.g. lost rudder, fouled propellor)	W. Van der Zwan Zonen Visserij Maatschappij B.V.
Zeeland	11 Feb 2020	Casualties	British Isles, North Sea, English Channel, Bay of Biscay	Collision (involving vessels)	Scheepvaart-bedrijf Zeeland
Zeeland	29 Jun 2017	Casualties	British Isles, North Sea, English Channel, Bay of Biscay	Machinery damage/failure (e.g. lost rudder, fouled propellor)	Defensie Materieel Organisatie
Alida	28 Nov 2018	Casualties	British Isles, North Sea, English Channel, Bay of Biscay	Machinery damage/failure (e.g. lost rudder, fouled propellor)	W. Van der Zwan Zonen Visserij Maatschappij B.V.
Kapitan Nazin	07 Feb 2019	Casualties	British Isles, North Sea, English Channel, Bay of Biscay	Machinery damage/failure (e.g. lost rudder, fouled propellor)	Murmanskiy Trawl Fleet Joint Stock Company
Kapitan Sulimov	13 Jul 2017	Casualties	Iceland and Northern Norway	Miscellaneous	Kapitan Joint Stock Company
Pavel Kutakhov	24 Aug 2018	Casualties	Iceland and Northern Norway	Fire/explosion	Murmanskiy Trawl Fleet Joint Stock Company

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