

**Colin Leask  
Vaarhjem  
Symbister  
Whalsay  
Shetland Isles  
ZE2 9AQ**

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**Dear Prime Minister**

**Boris where's your Russian Sanctions? and Why are you allowing Faroe to give away Fish from UK Waters?**

75,000 tonnes of Blue Whiting are being fished west of Shetland by Russian Factory Ships, in UK Waters, how is this allowed?

Right now, just 100 nautical miles due west of Shetland, inside UK Waters, there are 11 huge Russian Factory Ships fishing Blue Whiting.

Not only are these Factory Ships freely towing their nets inside UK Waters whilst under so-called "Sanctions" against Russia, these giant industrial vessels are somehow fishing on a ridiculously inflated quota of 75,000 tonnes, which was granted to Russia by the Faroese Government, somehow allowing the Russians a loophole to then fish inside UK Waters !

So there's two questions here.

Firstly the most important in regards to this current war torn climate. With Russia still carrying out horrific atrocities against the Ukrainian people on a daily basis, and with the EU and UK supposedly having strict Sanctions set in place against Russia, how are 11 Russian Factory Ships allowed to openly fish in UK Waters???

Secondly, regarding Fishing access and quota distribution, how can the Faroese Government be in a position to grant Russia, an allocation of 75,000 tonnes of Blue Whiting quota to be fished within UK Waters???

This 75,000 tonnes allocated from Faroe to Russia, is actually 28.5% more than the allocated quota given to the entire UK pelagic fleet, for fishing within our own Waters. With the total UK Blue Whiting quota for 2022 only being 58,939 tonnes, how is a third party Country allowed to be allocated more quota within our Waters than our own UK vessels?

We catch our whole year's Blue Whiting quota in just two landings, which is only two to three weeks for the whole year, which is the average for nearly all the UK pelagic boats that have allocation to fish Blue Whiting. There's also UK pelagic boats with so little quota allocation of Blue Whiting, due to lack of a suitable track record, and a low overall TAC (total allowable catch) set by the EU Commission, that it's not viable for them to fish the Blue Whiting.

Yet there's 75,000 tonnes being freely given away to third party countries like Russia, instead of creating more employment within the UK fishing Industry, this is very hard to comprehend !

We're currently carrying out a Fishery Science trip, undertaking a Mackerel Egg Survey in UK Waters. The survey covers the west side of the North Sea, from north of Ireland up past the Western Isles of Scotland and finally finishing northeast then east of the Shetland Islands, all within UK Waters.

As we were carrying out tows 100 nautical miles due west of Shetland, we came on the fleet of huge Russian Factory Ships towing south of the UK - Faroe border, within the UK sector. Obviously we were concerned on both the questions already asked above, why and how were these mammoth Russian floating factories towing inside UK waters.

So why are they here when the imposed UK/EU Sanctions are supposedly in place against Russia? and how are they fishing in UK Waters when they have no allocation of UK quota?

Even with the Russian Sanctions being in place by the UK Government, Russian vessels are being allowed to come and go as they please, without any form of resistance from our Navy or the SFPA Fishery Protection vessels. This is beyond belief, especially while the war in the Ukraine is still as horrific now as it was two months ago.

Besides the Sanctions in place, Russian Factory Ships have no fishing entitlement within UK Waters, so have no legal right to be allowed to fish here, yet their being allocated more Blue Whiting to fish in UK waters than our own UK fishermen.

After a lot of searching on the internet trying to understand why and how these Russian Freezer Trawlers are towing beside us in our Waters, I managed to find a bilateral agreement called the Forty Fifth Joint Faroese - Russian Fisheries Commission agreement. This agreement was signed on the 26th November 2021.

Within this agreement there was a mutual quota allocation set in place for the 2022 Fishery. With Faroe authorities permitting Russia the access into their Waters, including a special Shared Zone between Faroe and the UK, which is south of the Faroese border line but within the UK sector. (How can this be an equally Shared Zone when 100% of the Zone is inside the UK Waters ?).

The Fish quotas that Faroe allocated Russia as their part of the agreed exchange of marketable species, was 75,000 tonnes of Blue Whiting, 13,300 tonnes of Mackerel and 7,000 tonnes of Herring.

In return Russia granted the allocation of the following Fish quotas over to Faroe, which could be caught within the Exclusive Economic Zone of the Russian Federation in the Barent Sea,

15,356 tonnes of Cod, 1,343 tonnes of Haddock, 900 tonnes of Flatfish, and 2500 tonnes of Shrimp.

This is all fair enough, it's an agreed bilateral agreement, but what I don't understand is how can Faroe allocate all these quotas of Pelagic species to be fished in a defined special Shared Zone which is equally shared with the UK? Why would the UK Government allow this to take place?

Allowing this 75,000 tonnes to be fished by Russian vessels inside this Shared Zone within UK Waters, allows the Russian vessels the potential of catching 28.5% more Blue Whiting

than the whole UK's own quota, nevermind how much the Icelandic vessels have also been allocated from Faroe?

Regarding future stocks and also quotas being set for Blue Whiting in UK Waters, this unilateral and irresponsible allocation of quota by Faroe in the long term will be devastating for the UK pelagic sector. With Russia's allocation of 75,000 tonnes alone, nevermind Iceland's share from Faroe, being fished inside UK Waters, will totally skew all the hard work from the Marine Fishery Scientists, with their continual stock assessments within UK waters along with ICES (International Council for the Exploration of the Sea) with their final calculations on stock biomass and important advice on stock sustainability.

This final figures and advice is presented to the Fishery Commissions for setting future TAC quotas, for ensuring all stocks are kept sustainable. But with an additional 75,000 tonnes-Plus, potentially being fished from UK Waters which wasn't taken into the findings or calculations at ICES, this TAC figures will be skewed and in return show the Blue Whiting stocks to be unsustainable if being fished at this current level they are.

Knowing this now raises another question for the UK Government. Why does the UK still allow Faroe to equally use, and fish, within this special Shared Zone?

Knowing fine well that Faroe are allocating third party countries with no fishing entitlements within UK Waters, giving the likes of Russian and Icelandic vessels a legal loophole to gain access to fish freely in this shared Zone within UK Waters, not knowing what fish is actually being legitimately caught, as there are no Scottish Fishery Protection Agency (SFPA) vessels regularly policing that area west of Shetland.

Yet another very worrying reason our Government should rethink this equal access with Faroe, is knowing the repeated irresponsible and draconian actions in which Faroe carried out with their Mackerel quotas in 2010 and 2011. Where they unilaterally raised their quota from 25,000 tonnes to 85,000 tonnes then to a staggering 150,000 tonnes, totally against all ICES science and all Fishery Commissioners advice, which in return then lost the whole Atlantic Mackerel Fishery its MSC certification of sustainability.

Then in 2014 with Russia's annexation of Crimea, resulting in Sanctions again being enforced against Russia. Moscow then retaliated by imposing a series of restrictions on the import of food, which included fish, from the EU, Norway, Iceland, USA and Canada.

As a result of this, it played straight into the Faroe Island's hands, becoming the only source of imports for Russia of herring, mackerel and farmed salmon, as they weren't part of the EU.

Which in return increased Faroe's income from fish exports to Russia, from \$112 million to \$334 million. So now Russia is the single most important export destination for the Faroe Islands.

Then just last year in 2021 Faroe once more unilaterally raised their Blue Whiting quota from 82,000 tonnes to another staggering figure of 267,413 tonnes, and again against all recommendations from the ICES scientists.

So effectively, this ridiculous unilateral increase in quota of the Faroese Blue Whiting in which they are using as a marketable commodity, and swapping for Russian Barent Sea Cod, is basically just Faroe printing themselves new money, like the 75,000 tonnes of Blue

Whiting worth £16.5 million, and in return now get to catch and sell 15,356 tonnes for £60 million.

Faroe is very much heavily reliant on the UK for export, especially in regards to Whitefish and Salmon Fish Feed, where the UK has minimal export needs to Faroe.

In 2019, the UK and Faroe made a Free Trade Agreement (FTA), governing the trade relationship between the two countries post-Brexit.

But this so called deal is so far Skewed its laughable. In 2021 Faroe exported forty two times more goods and services in value to the UK, than the UK exported to the Faroe Islands. So hows that a fair even deal?

Since the FTA deal was set in 2019 the trade between both countries has increased dramatically. According to the Department of International Trade in 2021 the UK imported £901 million worth of goods and services from Faroe, of which £695 million was Services (Oil related), £159 million was Fish/Seafood and £44 million was Salmon Feed. But only exporting £21 million to the Faroe Islands, where only £1 million was for Services, and £20 million for Goods/Food, of which was £7 million for Animal Feed, but £0 million for Fish. While this trade deal is important for both countries' economies, the Faroe Islands are much more disproportionately reliant on the UK as an export destination than the UK is for Faroe. In 2021 the UK was Faroe's third largest trading partner, behind only Russia and Denmark. With UK imports from Faroe being UK's 80th largest trading partner, accounting only to 0.1% of the UK trade.

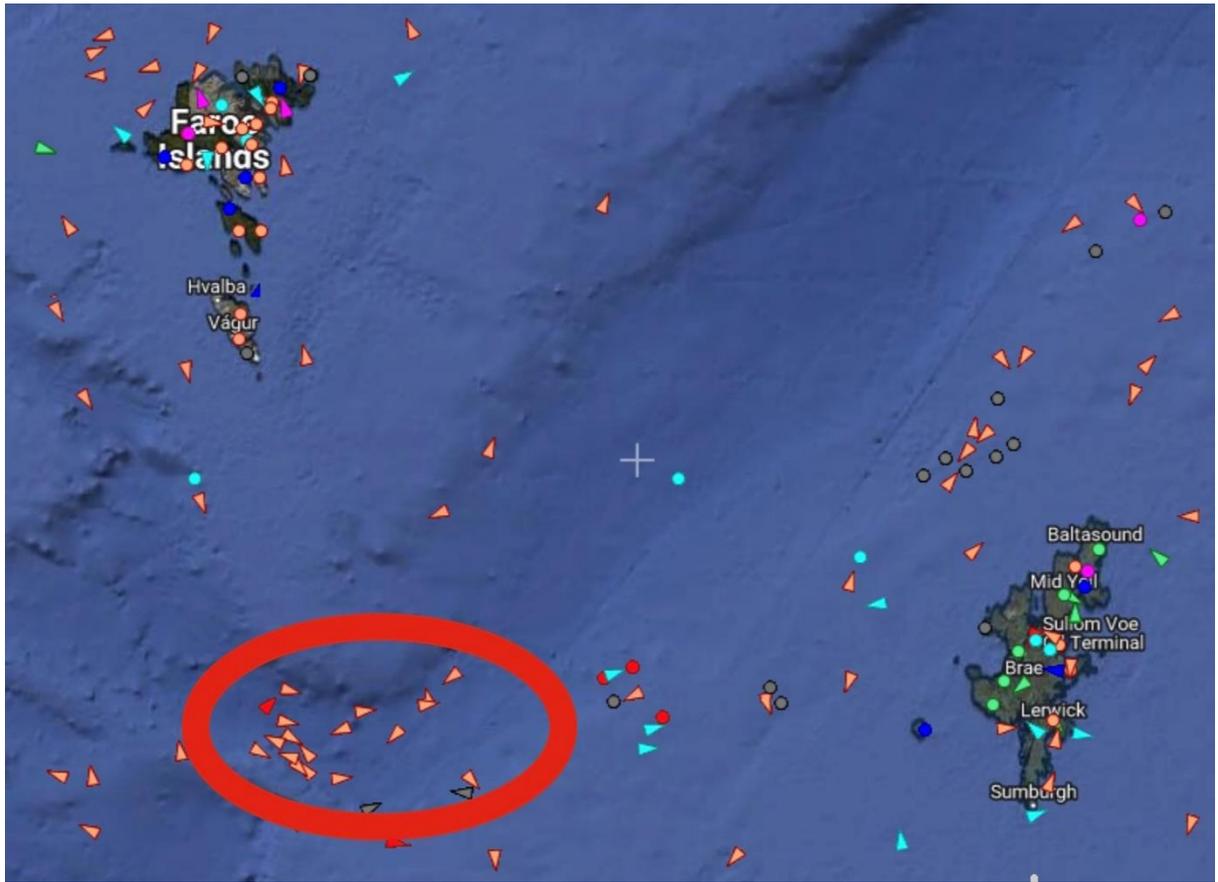
In a nut shell the UK import £159 million of Fish/Seafood where Faroe import £0 million of UK Fish/Seafood. Which a large percentage of this £159 million of Fish is caught inside our UK Waters. But UK are importing £695 million of "Services" from Faroe, compared to just £1 million of Services from the UK.

So please explain why the UK Government doesn't abolish this loophole of a Shared Zone with Faroe? Is it purely used as a bargaining chip to trade for Faroese so-called "Services", rather as a fair bilateral Fishing Agreement?

Really all its doing is allowing the Faroese to print money, and allowing Third Party Countries like Russia and Iceland to catch large quantities of pelagic species within UK waters, of which our own Industry would much more benefit from, both financially for our fishing Ports economy, and the creation new employment within our fishing communities.

Regards,

Colin Leask  
Altaire LK429.





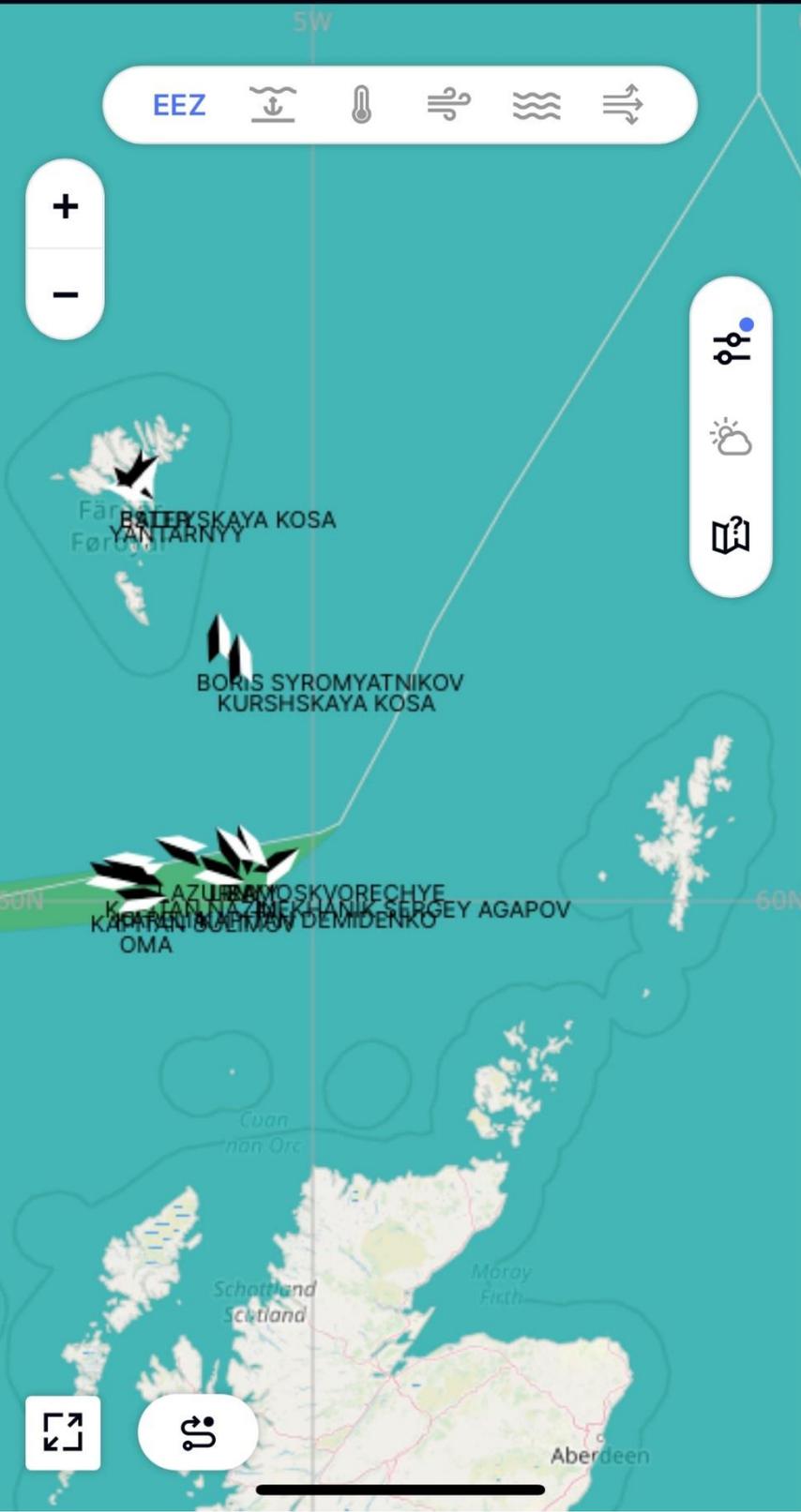
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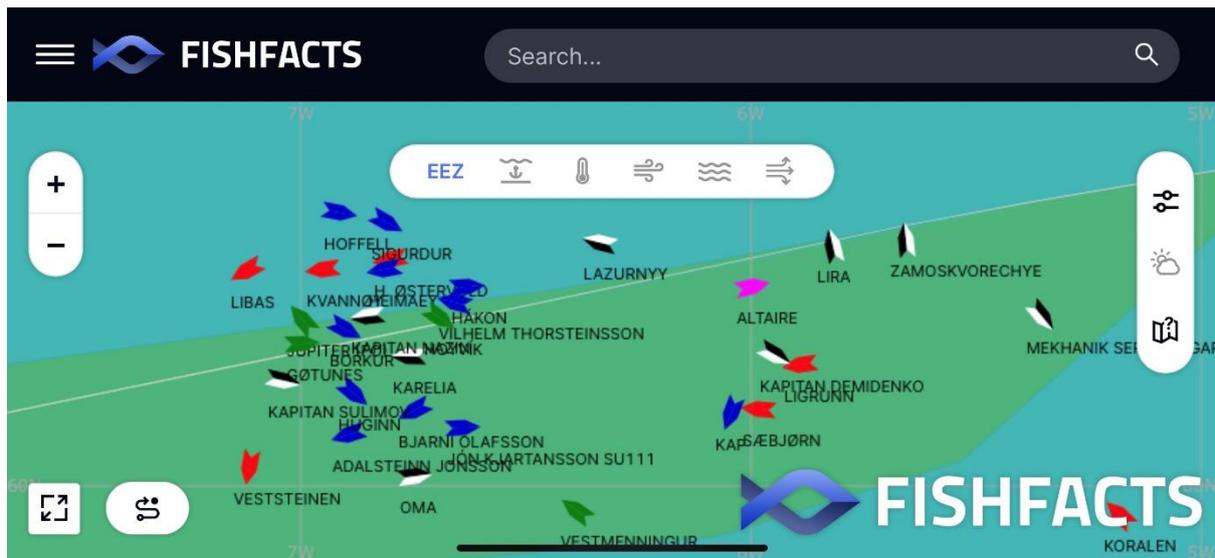


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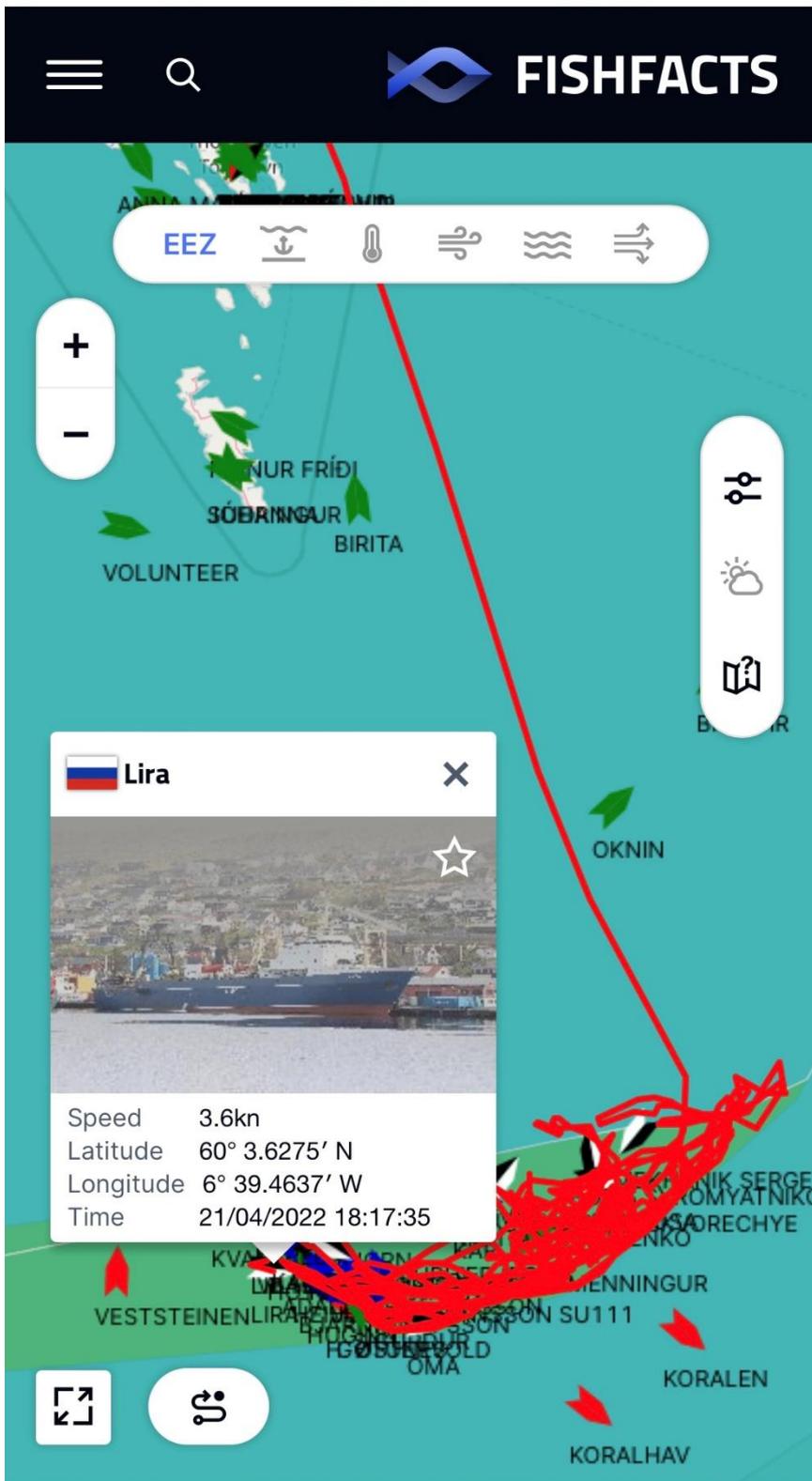
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All Russian Vessels are shown here on the Fish Facts AIS system as Black/White vessels. The white line running from west to east above the vessels, then up into the northeast is the UK/Faroe EEZ line, so all vessels are clearly within UK Waters. The Green area is the Shared Zone between UK and Faroe, which is all inside the UK sector.

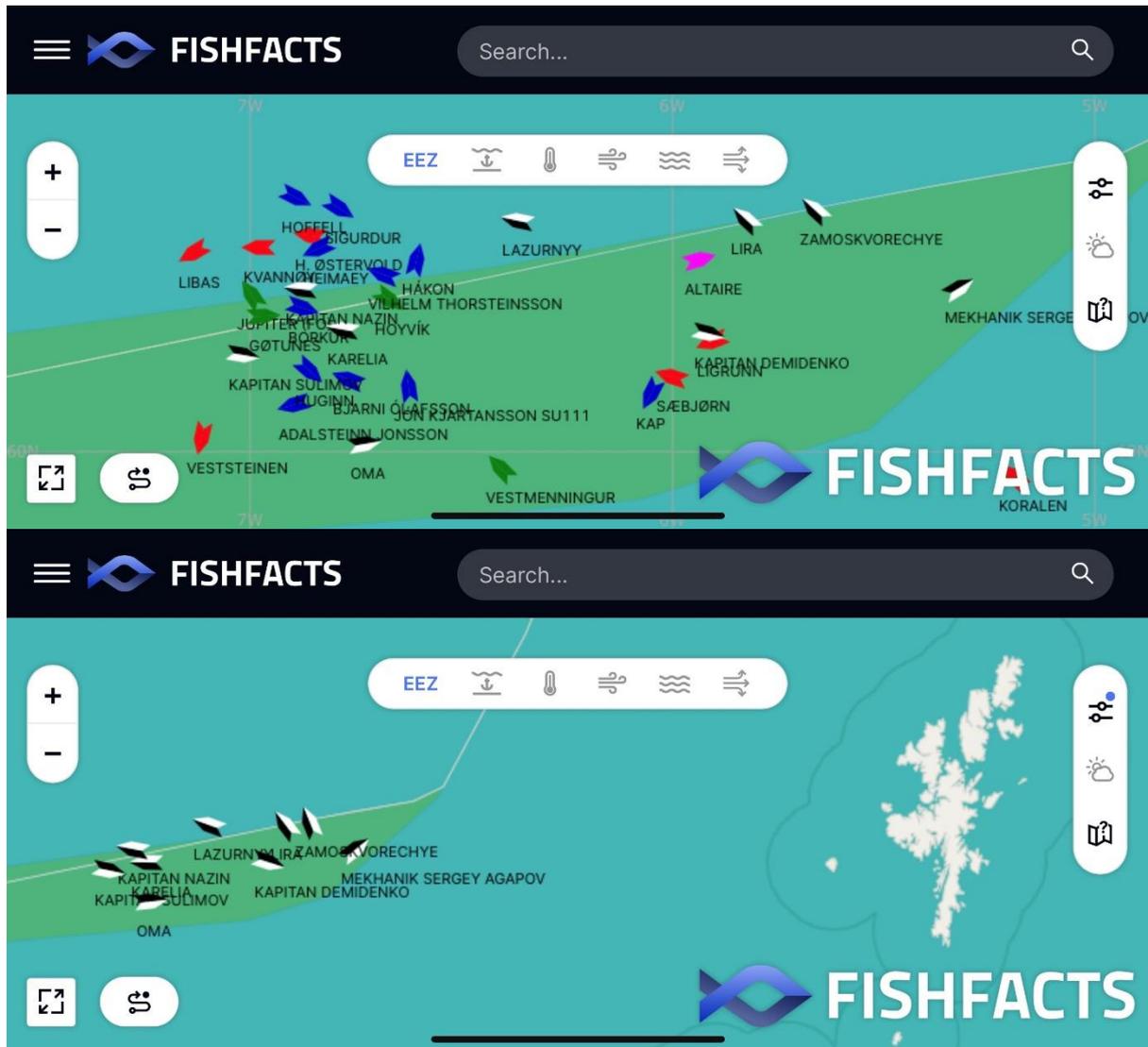


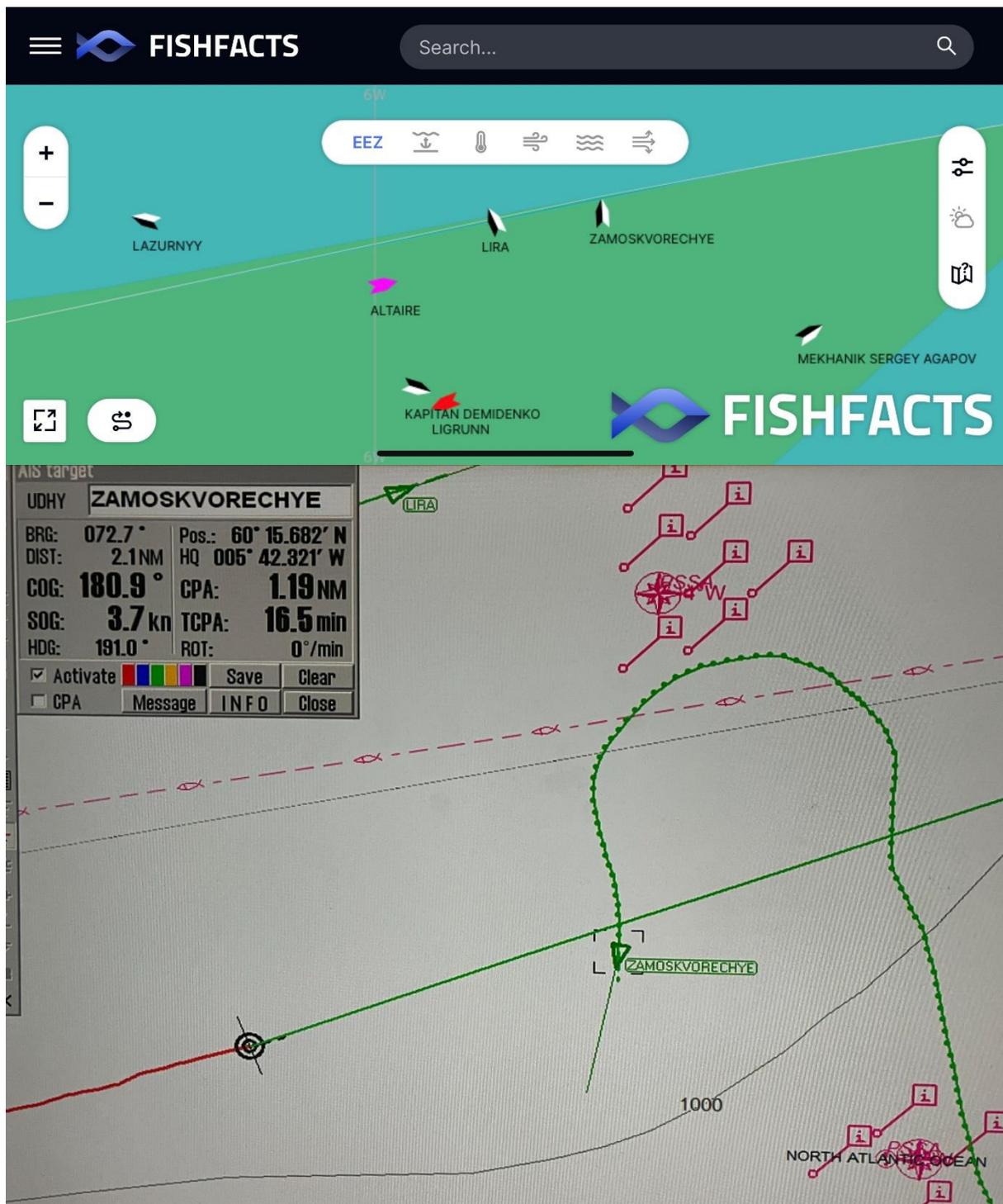
The coloured vessel icons each signify the country from which each fishing vessel is registered, they are as follows- UK - Pink , Russia - Black/White , Iceland - Blue , Faroe - Green , Norway - Red .



Here shows the

past towing track of the Russian Factory Ship 'Lira', towing constantly within the Shared Zone inside UK Waters, then steaming to Faroe to refuel and potentially land some of their catch into a Faroese Fish Meal Plant.





You can see clearly the Russian Factory Ship towing in front of us south of the UK-Faroe EEZ line inside the UK sector.



Not my photo , its taken from Marine Traffic , showing the Factory Ship "MEKHANIK SERGEY AGAPOV".

Regards,

Colin Leask  
Altaire LK429.