

## Seafood Scotland Briefing Paper

### Review of the EU-UK Trade and Cooperation Agreement – March 2024

#### The Scottish Parliament – Constitution, Europe, External Affairs and Culture Committee

[Seafood Scotland](#) is the national trade and marketing body for the Scottish seafood industry.

The export value of the Scottish seafood sector in **2022** was **£1.041 billion**, with Scottish vessels landing **429,000 tonnes** of fish and shellfish and **4,117** fishers working on Scottish vessels. In the same year, there were some 113 fish processors operating in Scotland with some **7,630** employees. Meanwhile, more than **2,500** people were directly employed in salmon farming throughout Scotland, with **10,000** jobs across the UK dependent on the sector.

Scottish salmon was the UK's top food export in **2023**, with overseas sales of £581 million. Annual sales of salmon in the UK in 2023, meanwhile, were around £1.25 billion.

In January **2024**, Scotland accounted for 84.6% of the UK value and 86.8% of the tonnage of fish landed for the month. Peterhead is by far the busiest fishing port in the UK, accounting for 67% of the total Scottish value and 57% of the total UK value in January, with tonnage shares of 66% of the Scottish total and 57% of the UK.

#### Trade with the EU

Access to EU markets is critical to the seafood industry in Scotland. Seven out of the top ten export markets for Scottish seafood are EU member states, accounting for 70% of Scottish seafood exports (by value).

Customs and SPS checks, required under the TCA, are matters of considerable concern given their potential to cause delays at ports/borders/points of entry to the EU market. Delays can be very damaging, leading to goods being delivered late to customers and/or spoiling of fresh/live products.

Given the nature of seafood, freshness is key to seafood's appeal to consumers and therefore it must be delivered to market in as pristine a condition as possible, as swiftly as possible. There is a diminution in achievable market price as each day of this shelf life passes. Delays, therefore, can ultimately undermine the profitability (and, in some cases, viability) of the aquaculture, fisheries and fish processing sectors in the UK, particularly in Scotland, which has a higher proportion of its economy centred on seafood than other parts of the UK.

Scottish seafood enters the EU27 market via a number of routes. However, a very considerable proportion arrives via the Channel Tunnel and this volume of produce needs to be cleared for free circulation within the EU by undergoing checks and formalities at the Border Control Post (BCP) at Boulogne-sur-Mer in France.

As well as operating as a BCP, the seafood markets and distribution hubs at Boulogne-sur-Mer are some of the largest in continental Europe and supply much of the continent with Scottish seafood. They are critical to the exporting success of the Scottish seafood sector. The market in Boulogne closes

at midday and missed connections in the haulage process can mean that any delivery cannot happen until the following day, if at all. There are, therefore, very tight timescales to work within once

seafood consignments are dispatched from the UK. This is particularly so the further the relative point of dispatch is from the point of destination, as is the case for most Scottish seafood within the context of UK/GB geography.

### **Post-Brexit trade under the TCA**

Trade in seafood between the EU and UK is manageable but sub-optimal at present. There are a number of additional trade barriers as a result of EU exit which hampered trade significantly in the early stages and which still represent costs and challenges for the sector, albeit these have reduced over time.

Additional processes, certification and documentation, mainly to ensure compliance with customs rules of origin and SPS requirements under the TCA and to meet EU official controls for third countries, have added a considerable time and cost burden for Scottish seafood traders. The Scottish seafood sector has worked very hard to adapt to the new post-EU exit trading relationship but, in many ways, this effort has been directed to merely “standing still” as regards EU trade, and maintaining trade flows and relationships with EU businesses and customers, rather than growing or improving them from the position prior to EU exit.

Any UK-EU agreements to further reduce trade-related bureaucracy would be welcomed, as would efforts and initiatives on the UK side to bring forward programmes to digitise and streamline trade/border systems and processes (eg the Single Trade Window and eEHCs).

There is certainly also an interest in developing the UK-EU trading relationship further through an agreement on SPS measures, whether that be based on existing agreements the EU has with other third countries (eg Switzerland, New Zealand) or a bespoke UK-EU agreement which reflects our unique trade relationship.

Measures such as greater sharing of information, cooperation and close working between officials across jurisdictions, as well as more alignment and integration between IT systems used to manage trade between jurisdictions could, in our view, be applied at UK-EU level to support simpler and easier trade. The adoption of “light touch” and risk-based surveillance, inspection and enforcement, as well as reduced certification requirements, would also help to minimise costs and challenges for traders from the rest of the UK if the terms and principles of the Windsor Framework, applicable to Northern Ireland, were extended to the wider UK-EU relationship.

It should also be noted that, of particular importance to the Scottish seafood sector, the TCA provides for the gradual transfer of quota shares to the UK up to **30 June 2026**. We will continue to monitor and, where appropriate, seek to influence these and other fisheries stocks arrangements alongside our monitoring of the operations of the trade-related aspects of the TCA up to and beyond the first review date.