

Petitioner submission of 23 August 2022

PE1951/F: Reinstate inshore coastal limit on the use of dredge and trawl fishing gears

Scottish Creel Fishermen's Federation (SCFF) agree that 'calls for arbitrary blanket restrictions' should not be supported, which is why we are calling for a [change](#) from the current blanket 'trawl and dredge anywhere you like' policy.

A variation of the historic inshore limit, as set out in [3 mile limit – A case for Sustainable Fishery](#), does not have to be a blunt or blanket approach. The approach can be varied to accommodate practical requirements.

We would, however, highlight that there is an urgent requirement, as well as an international commitment, to 'protect' 30% of our seas from damaging activity.

We also feel the Scottish Government's claim that 37% of our seas are already protected is inaccurate.

The re-introduction of limits on where dredge and trawl can take place inshore can be as blunt or sharp an instrument as the Government wish to make it.

Scotland have signed up to the UN Sustainable Development Goals, including:

- **SDG 14:** *Conserve and sustainably use the oceans, seas and marine resources for sustainable development;* and
 - **Target 14.b:** *Provide access for small-scale artisanal fishers to marine resources and markets.*

SCFF are not asking for the old three-mile limit, but rather a variation of that limit i.e. something different but on a similar scale. The appropriate spatial management for each region should reflect that area's habitats and fishing patterns. E.g. 90% of all creels deployed in the west coast inshore would be encapsulated by a three-mile limit, this is not true of the east coast where much of the creel sector work further offshore.

Accordingly, the type of spatial management that would optimise the jobs and maximise ecosystem recovery on our east coast would most likely be a

series of large static gear zones or 'boxes' reaching to in excess of 12 miles from shore. Each of Scotland's regions and island groups should have spatial management plans that reflect their specific circumstances.

We believe that current Inshore Fisheries management is not fit for purpose, a view similarly expressed by [Open Seas](#).

- Despite the use of Marine Protected Areas (MPAs), trawling and dredging are restricted in less than 5% of our inshore waters!
- Government proposals to designate 10% of our inshore waters as No Take Zones (Highly Protected Marine Areas HMPAs) will, in our view, displace existing fishing effort, compounding current problems elsewhere.
- Comprehensive vessel tracking was meant to be completed by 2019, '*limited*' roll out is now proposed for 2026.
- Information included in Scotland's 2020 Marine Assessment demonstrates a failure to meet a previous commitment to '*protect and recover our remaining priority marine features*'.
- The landings obligation/discard ban, which was the cornerstone of the 2015 reformed common fisheries policy, has in our experience, effectively had zero compliance by industry and or enforcement by Marine Scotland.

The Government say "*references to the 'decimation' of inshore ecosystems and fish populations are not accurate*". We question which of the following facts they challenge the accuracy of:

- **Herring** (once the most prolific fish caught in Scotland's seas) are now effectively commercially extinct on our west coast.
- **Cod** are effectively commercially extinct on the west coast, now considered a 'choke' species with the International Council for the Exploration of the Seas (ICES) issuing a zero Total Allowable Catch. Despite this, the Government continue to issue quotas.
- **ALL** previously targeted commercial fin fish species, once prolific in Scotland's inshore waters, such as **Haddock, Whiting, Hake, Saithe, Plaice** etc have [seen landings decline by as much as 98% since the area was opened up to trawling](#).

We can see [no signs of recovery](#) or government proposals to facilitate a recovery.

This not only relates to commercial species. Much of the flora and fauna which supports commercial species throughout their life-cycles, and which perform other essential ecosystem services, have seen equally dramatic declines.

As our petition notes, Scotland's Marine Assessment 2020 found that in the decade preceding 2020, Scotland 'lost' [significant areas of our biogenic reefs](#).

The vast [majority of our remaining priority marine features](#) are contained within the historically closed area. Proposals to protect this area from further damage, which would in turn facilitate the protection and recovery of those essential habitats, are by no means arbitrary.

The Government say inshore limits are not supported by fishing associations, given they represent a substantial portion of Scotland's trawl fleet this is unsurprising.

Nevertheless, in each of the Inshore Fisheries Groups management plans, which were drafted a decade ago, the inshore fishing industry requested spatial management, however, Marine Scotland have thus far failed to introduce spatial management or even develop proposals for such in our inshore.

Marine Scotland claim to be *"pursuing a more tailored approach to the separation of mobile and static fishing gear"*.

SCFF are not aware of any extensive spatial management proposals, however, if the Government could provide information on this approach, or plans showing extensive inshore spatial management, on a scale which equates to or offers similar protections for Scotland's remaining inshore fisheries and ecosystems as can be achieved by introducing a variation of the historic inshore limit, we would be open to withdrawing this petition.

SCFF are unaware of the basis or foundation of Marine Scotland's claim and as such we question its veracity.

If Parliament do not consider the [evidence](#) compelling, perhaps a board or commission of enquiry could be convened to report back on exactly how much is actually protected, [at risk](#), or on the road to recovery, and what

evidence is available to back the Government's claim to be '*pursuing a more tailored approach to the separation of mobile and static fishing gear*'.

Additional evidence the Committee may find useful:

- [Paper on the condition of the Clyde and the requirements for extensive restrictions on mobile demersal fishing gear](#)
- [Assessing the potential vulnerability of sedimentary carbon stores to bottom trawling disturbance](#)
- [Briefing on Blue carbon and the locations of our remaining Priority Marine Features \(PMFs\)](#)
- [Our Seas FAQ](#)