

# Marine Concern and Seal Scotland submission of 23 August 2022

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

The Scottish government would have you believe that 37% of Scottish waters are already “protected”. The reality is far from the truth, furthermore, we are actively engaged, via MSPs to question the responses from the Minister for Environment, Màiri McAllan MSP, both following a video conferencing call with the Minister, the Minister’s follow-up letter and email via a third-party MSP.

We have made a submission to the Rural Affairs Committee and a letter is currently lodged with Cabinet Secretary, Mairi Gougeon MSP, concerning the current lack of protection and little by way of forthcoming evidence to substantiate the claims of the Scottish government being; - *“World leading”* and *“The Scottish Government manages sites within the MPA network to achieve the conservation objectives”*, along with many other contested claims by the Minister.

Much of Scotland’s seas are in dire straits, this includes, damaged ecosystems and a loss of commercially targeted fishes. As we continue to fish down the food-chain with increasingly advanced electronic equipment, leaving few undisturbed fish stocks, powerful vessels utilising more advanced gear that can extend into areas not previously fished the ecological damage is unrelenting; this has an adverse effect on replenishing and even the very survival of important species and that includes keystone species on which much of the Scottish marine ecosystem depends.

The Scottish Government is a signatory of the Precautionary Principle through the UK’s engagement at the Rio (Earth) Summit in 1992, however, it is not used anywhere near enough. Scotland does not require new legislation to provide for the protection needed.

Marine Concern and Seal Scotland support methods that ensure protection for the marine environment, which of course includes the

species that maintain it and additional industries that rely upon what was once Scotland's rich biodiversity and pristine waters.

A reintroduction of the Three Mile Limit is one way of enabling protection to vital seabed communities that support fish reproduction and a more robust, resilient ecosystem which is in desperate need of assistance during these climate changing times. The Royal Commission on Environmental Pollution stated that 30% should be no-take, nearly twenty years ago, currently little has been done, even the current measures with Cod Closure in the Clyde have failed over twenty years, so strong is the current pressure from the mobile sector that the area was actually reduced in 2022; no scientific evidence has been exhibited to support such a move.

It has been said that, "It is cheaper to allow the current system to collapse, rather than try to fix it"; what this statement does not state, is the emerging 'system', may not include humans! Under the current GDP and eternal growth scenario, leaders must place a value of marine ecosystems on those that support the extractive commercial processes or **there will be no commercial fishing left!**

Marine Concern and Seal Scotland support this petition, however, we would go further and call for 30% of Scottish waters to be No-Take-Zones, this would include No-Put as well.