

Shona Marshall submission of 23 August 2022

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

I would like to support the call for spatial management within the inshore area. While agreeing that one size doesn't fit all, there appears to be a lack of any management and enforcement proposals for this area, or discussion of these, and the establishment of an inshore limit to trawling for at least part of the coast would help to start this.

I'm disappointed, but not surprised, that the Scottish Government knows only the vessel membership of CIFA and SFF but has failed to look at other sectors or find out about them. There is recognition in the text of marine areas being a valued asset together with the economic and cultural fabric of the coast. The Scottish Government response, however, does not appear to consider the many non-trawling users and cultural activities within the coastal zone.

There's much lauding of the Marine Protected Area's (MPAs) covering 37% of the coast, although protection is questionable. From Scotland's Marine Assessment 2020, MPA's are failing, with a decline recorded in the priority species monitored. The lack of management to date has resulted in this. The proposed 10% Highly Protected Marine Areas (HPMAs) are, in my view, inadequate to address the decline, and highly likely to fail without proper enforcement. Marine areas need actual protection, not more discussion. Enhanced vessel tracking, due to have been introduced by 2019, would have helped with enforcement, but the implementation of suitable spatial management would enable Scotland to meet its obligations.

Sea fish cannot be described as 'low carbon'. A [recent study](#) shows that the west coast has the most vulnerable habitat to bottom trawling. A prime candidate for the introduction of a trawl limit to reduce the carbon footprint of the industry while protecting the environment and other users?

Recognising the need for co-management, who will be involved and what are the plans for directing the management? Co-management can

work but the results will be weakened without robust guidance and follow up legislation. With the need to improve Good Environmental Status (GES), the clear benefits to the environment and industry shown by the Lymes Bay and Arran coast initiatives and the studies demonstrating the importance of certain inshore habitats to blue carbon, a clear steer from the Scottish Government, albeit in discussion with stakeholders, will deliver a more robust management.

It's disappointing to read that fishing activity will be capped at current levels. The deterioration of marine features would suggest that this is insufficient to fully protect the environment and, while stating this is a 'ceiling from which it can be reduced considering further evidence', I must ask how much evidence is required? I was out on monitoring vessels in the 1990s, and there have been numerous studies quantifying impacts of different gear and fishing intensity on a range of habitats. Calls for further evidence, monitoring or research throughout the Scottish Government's response before action is, to me, indicative of a delaying strategy.

I would suggest that we are beyond 'considering' protection of spawning and juvenile fish if there are any hopes for a sustainable fishing industry. There should be action, based on sound advice, to fully protect these areas and remove all detrimental activities. Unfortunately, scientific advice has been ignored or reduced for decades with regards to fish stocks and catch quotas.

I would agree that the Clyde is not an ecological desert but would argue that the decimation of the inshore ecosystem and fish populations is shown within this response. A change in the size range and species composition of the community following the introduction of intensive fishing clearly demonstrates the adverse impacts of intensive fishing and the loss of a once thriving ecosystem. That this ecosystem has been replaced by another doesn't detract from the decimation of the original. Not to mention the impact on the commercial fishery itself. What other protected species have been impacted by this change in composition and to what extent?

I'm surprised that the optimum strategy isn't to be followed. While there are a number of factors to be considered within that strategy – environmental, economic and social – the consideration of these factors helps to devise the optimal strategy. Politics should not have a defining role, nor should one voice take dominance. It has been seen here, and

in other discussions, that greater weight is placed on the views of a few. This is the time to put the environment first, to its benefit and that of the economy and social factors.

I believe there is a need for spatial management within the inshore waters to protect priority features, commercial fisheries, and other users, as well as addressing climate change. This will require a step change in the thinking of users, managers and politicians but also requires an urgency not shown in the various agreements, strategies or talks to date.