

# Open Seas submission of 24 August 2022

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

Thank you for your consideration of this important matter and an opportunity to input.

Open Seas is a marine conservation charity set up in 2016 in response to the loss of marine biodiversity and fish stocks in inshore areas. We support SCFF's petition because the evidence indicates restricting the extent of scallop dredging and bottom trawling in inshore waters would have environmental, economic and social benefits over continuing to allow them to operate as at present.

The removal of the three mile limit is widely understood (in scientific literature and more informally within fishing and coastal communities) to have led to a significant loss of marine biodiversity and fish stock status due to the damage caused by scallop dredging and bottom trawling in these vital inshore areas. We ask that the petitions committee find time to explore these issues with stakeholders, including those with lived experience of these declines – in our view this issue has been side-lined for too long and deserves public scrutiny.

Open Seas conducts extensive field work and seabed survey work and we have witnessed this damage throughout Scotland's waters. Scallop dredging has shrunk the extent of many sensitive inshore habitats to a small fraction of their historic range such that they now exist in only a few areas, most of which are only there because underwater topography makes dredging impossible. Sadly these losses continue to this day, the Scottish Government themselves recorded ongoing losses between 2010 and 2020, despite the designation of Marine Protected Areas (<https://marine.gov.scot/sma/assessment/biogenic-habitats>), and we ourselves we recorded maerl bed losses as recently as June 2022.

The losses of fish stocks over the past 50 years is also well documented, particularly on the west coast (ICES area VI) and shown clearly in the this graph <https://www.openseas.org.uk/wp/wp-content/uploads/2022/09/image010.png> made using Marine Scotland data, with the removal of three-mile limit marked with a dashed line (note

that the y-axis of each graph is different meaning that the increase in shellfish landings did not offset the losses of whitefish).

The fish stock declines preceded job losses, and the number of fishing jobs in Scotland remains in decline even in the latest 2021 fisheries figures. <https://www.openseas.org.uk/wp/wp-content/uploads/2022/09/image011.png>

Marine Scotland appear to be ideologically against the proposal put forward by SCFF for a reinstatement of this ban and it is unclear why this is the case given work they themselves have commissioned has recommended it as providing significant benefits - notably, the [2015 Marine Scotland Technical Options for Change report](#) found that

*"using the illustrative assumptions as described throughout the report Scotland could create more jobs and generate an excess of economic benefits over costs by imposing a 0-3 NM restriction on the use of mobile gear."*

Similar research commissioned by Marine Scotland in 2020 found that

*"redistributing access to fishing grounds [between trawlers and creelers] to maximise employment could increase employment by around 10%... [or] £14 million of gross value added (GVA)".*

The flaws in this ideological position are illustrated well by the Scottish Government's response to this petition which states "*Just because theoretically there is a more optimum scenario, that doesn't mean that is what the policy should be*" which appears to be suggesting that optimum scenarios should not be delivered by policy. This would appear to be inconsistent with the Scottish Government's duties under the UK Fisheries Act (the post-Brexit fisheries legislation, in lieu of a Scottish Fisheries Act) which mandates that governments deliver a suite of objectives including the 'ecosystem objective' and the 'national benefit objective'.

Whilst we note that they also argue "*The Scottish Government has been consistent in resisting calls for arbitrary blanket restrictions, and instead pursuing a more tailored approach to the separation of mobile and static fishing gear, within our existing strategies and commitments noted above.*" we would also note that this is misleading given the Scottish Government actively promoted the [deep sea access ban](#), which bans

bottom trawling (and scallop dredging, though this is unlikely to ever take place there) in all waters deeper than 800m. Scottish Government progressed this blanket approach yet further, by also designating it a ['Deep Sea Reserve'](#).

The argument from Marine Scotland is that *"We wish to build on the work undertaken under our Inshore Pilots Initiative - learning from these pilots is already helping inform delivery of our national strategy"* yet the pilot [they selected in 2018 to explore spatial management of trawl and dredge fisheries \(i.e. "Zonal fishing management in the waters off Arbroath and Montrose"\)](#) has yet to even begin and no results except two brief anecdotal quotes from the Western Isles have been provided from any of the others either. Therefore, the suggestion that proposals, such as SCFF's, should wait until these pilots have concluded before being progressed is not appropriate.

In summary, we welcome the petition and see significant merit in the proposal based on the extensive literature available on the issue, the impacts we have seen ourselves, the data showing losses over time and the modelling which all predicts significant benefits. We contend that issues regarding inshore fisheries have been under scrutinised by Scottish Parliament and therefore ask that the committee make time within the parliamentary schedule to explore these proposals and a way forward for them.

With very best regards and thank you again for the opportunity to feed into this process.