

Seawilding submission of 23 August 2022

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

I am writing, on behalf of [Seawilding](#), in response to the Scottish Government's response, dated 4th August, to the SCFF petition.

All at Seawilding support the reinstatement of an inshore limit on trawling and dredging. It is the responsibility of the Scottish Government to listen to, *and act upon*, the concerns of all sectors. The language used in the Government response is akin to the rhetoric used by some supporters of the mobile sector to 'other' or dismiss the view of the many that do not financially benefit from trawling and dredging.

The Scottish Government response states; *'These continued calls are an unhelpful distraction from delivering on these commitments.'* These 'continued calls' are valid, they are coming from a wide variety of sectors, what alternative action to recover fisheries are they distracting Government from?

The Government response also states; *'Scotland's inshore fisheries are a most valued asset, making a significant contribution to the economic and cultural fabric of our coastal communities.'* Current fisheries bear no relation to those that built Scottish towns. We are aware of an episode of the programme *Cearcall*, broadcast on BBC Alba earlier this year, which included a report of creelers lamenting how the proliferation of trawling has cost them their livelihoods.

Where it says that Government *'Encourage the Scottish Creel Fishermen's Federation to work in partnership through established groups'* Do they mean Regional Inshore Fisheries Groups (RIFGs)? Each of their management plans (10 years old now) requested spatial management. Where is it?

The response states; *"We also 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"* Is it referring to the "Zonal fishing management in the waters off Arbroath and Montrose" pilot? What lessons have been learned?

The SCFF submission acknowledges that different approaches are needed in different areas, yet the Government's response says it is

'blanket' and 'broad brush', stating that the petition 'Ignores complex habitats as well as the distributions and behaviours of marine species within Scotland's inshore area'. Dredgers and trawlers have legal access to over 95% of our inshore waters, including within MPAs. You do not get much more 'broad brush' than that, and in no way has 'a balance been struck' as the Scottish Government claim. Repeated claims are made that 37% of our inshore waters are protected by MPAs, they are not, they are merely designated, to assert otherwise is false. Could the Scottish Government please provide detail on the 'more tailored approach to the separation of mobile and static fishing gear' that they are pursuing instead of spatial management?

The Scottish Government states it has a *'world leading commitment'* to fisheries management; this is merely a statement of intent. To date the Scottish Government's track record in fisheries management is, in our view, a litany of failures;

- **Vessel tracking** – Roll out has been delayed from 2019 to 2026.
- **The Scottish Marine Assessment 2020** – Failure to 'protect and recover our remaining priority marine features', PMFs that Marine Scotland have enough data for are 'unknown' or in serious decline, some to a catastrophic extent.
- **The 2015 landings obligation/Discard ban from the Common Fisheries Policy** - Industry has not complied, Marine Scotland have not enforced.
- **Herring** - Commercially extinct on our west coast. Failure to protect spawning grounds such as those off Gairloch, despite International Council for the Exploration of the Sea (ICES) stating: *"Activities that have a negative impact on the spawning habitat of herring should not occur."*(ICES, 2003, 2015b)."
- **Cod** - Commercially extinct on the west coast. This iconic fish has now been designated a *'choke species'*. ICES have issued zero TAC (Total Allowable Catch), yet the Scottish Government continue to issue quotas to facilitate inshore nephrops trawling. In an evidence session to the [RAINE committee in March](#) this year Professor Michael Heath said of Clyde cod; *'A hundred tonnes of cod are caught as bycatch. There is not much argument about that.'*

The monoculture of small whiting in the Clyde is neither normal, nor desirable, and cannot, in our view, be considered a positive change to the ecosystem.

We are aware of the pressures that are impacting fishermen, we are all under increasing pressure as climate change and biodiversity loss impacts our lives and mental health. The Scottish Government must take urgent and decisive steps to protect our inshore seabed from bottom dragged fishing gear, prioritise low impact fisheries, and allow biodiversity to recover, for all our sakes.