

# Sustainable Inshore Fisheries Trust submission of 24 August 2022

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

The Sustainable Inshore Fisheries Trust (SIFT) supports Petition PE1951 submitted by the Scottish Creel Fishermen's Federation (SCFF) which calls for the Scottish Government to 'Reinstate inshore coastal limit on the use of dredge and trawl fishing gears'.

Scotland's inshore waters (out to 12 Nautical Miles from the coast) are a model of marine mismanagement. Since the former ('3 Mile') coastal limit on mobile gear use was rescinded under the 1984 Inshore Fishing (Scotland) Act, there have been continued severe declines in species diversity and abundance in the area. This has harmed the ecosystem and the inshore economy.

It has been recognised for at least two decades that the primary cause of these ongoing declines is the inappropriate use of bottom-contacting mobile fishing gears – which not only scour the seabed and remove habitat vital for fish stock recovery (*Source: Ecological meltdown in the Firth of Clyde, Scotland: two centuries of change in a coastal marine ecosystem Thurstan, R.H. and Roberts, C. 2010*), but also because of the level of finfish by-catch in Nephrops trawling gear (*Source: Discard composition of the Nephrops fishery in the Clyde Sea area, Scotland. Fisheries Research Bergmann et al., 2002*).

These declines have transformed the resilient and diversified Scottish west coast fishery. Within ICES Area V1a (essentially west of Scotland waters) there has been a shift from a mix of whitefish, bottomfish and shellfish, to essentially a shellfish monoculture. (*Source: Investigating the Trends in Scottish West Coast Fisheries Over the Past 50 Years and the Introduction of the 1984 Repeal. MacFadden, E. 2018 [Unpublished]*).

Remaining fish stocks are now dominated by small whitefish, overwhelmingly below Minimum Landing Size, and therefore of minimal commercial value. This situation is unlikely to change whilst bottom-contacting mobile fishing gears continue to damage the seabed and be responsible for substantial quantities of by-catch.

In the light of these events, the call by the SCFF in PE1951 to reinstate some form of spatial management which will put limits on the ability of the bottom-contacting mobile fishing gear fleet to operate across the great bulk of Scotland's inshore waters, must be supported.

SIFT also notes that the failure to implement effective spatial management of bottom-contacting mobile fishing gears plays a central role in a wide range of policy failures, including:

- **Ecosystem-based approach.** The [Blue Economy Vision for Scotland \(www.gov.scot\)](https://www.gov.scot) includes an environment focussed outcome that '*Pressures on habitats and marine nature are managed using an ecosystem-based approach to minimise negative impacts and, where possible, reverse historic impacts*'. It is difficult to see how an ecosystem-based approach will be effective whilst there are inadequate spatial limits on bottom-contacting mobile gears.
- **Good Environmental Status.** The Scottish Government has a duty to achieve Good Environmental Status (GES). 11 of the 15 GES marine indicators failed in 2020. Furthermore, every one of Scotland's inshore marine regions failed the seabed health indicator for GES. Again, spatial controls on bottom-contacting mobile gears would materially redress this failing.
- **Commitment to protect 30% of Scotland's seas.** Claims that 37% are protected through Marine Protected Areas are a fallacy as there are little or no management measures in place to afford the great bulk of this area any additional protection over the rest of the waters. The most effective mechanism for ensuring that MPAs do indeed 'protect' is to place some form of spatial limit on the use of the most destructive and widely-used fishing gears – namely bottom-contacting mobile fishing gears.

It is notable that in its response to PE1951, The Scottish Government asserted that '*under our Inshore Pilots Initiative - learning from these pilots is already helping inform delivery of our national strategy*'. However, none of the Scottish Government's 'Inshore Pilots' have provided evidence to support its policy of continuing to allow trawling and dredging to operate across the bulk of the inshore waters. It is now urgently needed that, *de minimis*, large scale spatial management of bottom-contacting mobile fishing gears are trialled.

The core of the problem with fishery management in inshore waters is the **Scottish Government's continuing reluctance to recognise that different fishing gears have different adverse impacts, and that accordingly there should be greater restrictions on more damaging gears than there are on less damaging gears** (especially static gears like creels). Given that the inshore waters, and the wild stocks of fish and shellfish that inhabit these waters are public assets, it is now urgently necessary for them to be managed for the public benefit, rather than for the benefit of the small minority of commercial fishers who operate trawl and dredge gears.