

# Nick Underdown submission of 24 August 2022

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

The Scottish Government rules out a coastal limit on bottom-towed fishing by arguing it is a 'blanket approach'. Yet the current approach is a blanket approach, allowing bottom-towed fishing gear to operate across >95% of Scotland's inshore seabed (0-12nm). Government research forecasts economic benefits - environmental benefits are not factored in - by restricting bottom-towed fishing inshore: this research has been consistently ignored.

Globally it is accepted that public fisheries must secure a 'social license' to operate. There is no clear social license for widespread inshore bottom-trawling. Calls for reform have been sounding for decades. A Clyde petition in 2010 attracted several thousand signatures, backed by sea anglers deeply concerned by fish declines compromising their rights to fish. Now over 8,000 people have signed a [public petition](#) to reinstate an 'inshore limit'. This issue is not going away.

A former local reporter, I now work for a Scottish charity that promotes sustainable fisheries and environmental recovery, but this is a personal submission. During my adult life, principled accounts from active fishermen have deeply shaped my understanding and lead me to conclude this petition must be supported:

*'I will not put my head up, because if I do, I'll just get my gear towed and they'll make my life difficult. I can't afford that.'*

I've heard this statement from too many creel fishermen. The threat of what is euphemistically termed ['gear conflict'](#) constitutes constant low-level intimidation and suppresses local and national debate. Scottish Government's Gear Conflict Taskforce (2015) has failed to deliver many of its recommendations. Whilst there are a [few brave exceptions](#), it's unacceptable that people making a livelihood from the sea feel they cannot speak out, due to threats of economic or social harm. Politicians and government need to provide safe conditions for a mature dialogue and debate.

*'Where was the just transition in 1984?'*

This was spoken by a creel fisherman in the NW Highlands and strikes to the heart of the debate. Some commercial trawl interests are understandably defensive about calls to limit their access to the coastal zone. They use tactics to resist change, because they are likely fearful for their livelihoods, traditions within trawl fisheries and perhaps believe that spatial controls will be the 'thin end of a wedge'. Many people calling for change are sensitive to this and set out an open-hearted position; endorsing a just transition so those working in bottom-towed fisheries and related supply chains are given due notice and support to adjust to any spatial measures. However, it must be recognised that while strategies should be developed for existing commercial fisheries, there is already a generation of fishermen that has been affected by the UK Government's decision in 1984 to remove the three mile limit. Fish population declines resulting from overfishing inshore nursery grounds have had untold impacts on many families that left the fishing. This historical injustice must be righted.

*"I used to see 'waves' of maerl, a crust three to four feet deep covering the seabed, this has now gone, reduced to gravel by scallop dredging."*

The spatial footprint of scallop dredging (never restricted by the three mile limit) has expanded in recent decades and contributed to the decline and loss of biogenic habitats (such as maerl) that were once more widespread across our coastal seabed. We will never establish historical baseline condition of our seabed, but testimonies of divers are crucial. Some of today's productive scallop gravel beds are actually simplified habitats that can no longer provide important nursery and spawning grounds that would benefit other commercial fisheries. These voices need to be heard, alongside retired fishermen involved in the early days of scallop dredging and removal of the 'Three Mile Limit'. The skill and enterprise of those who pioneered and excelled in the scallop dredge fleet is clear, but I've spoken to former dredge skippers who privately lament the damage that was done: one told me they used to hate fishing in the west coast sea lochs 'because of all the rubbish' (ie habitat) that was towed up along with the scallops. To make our inshore

fisheries resilient, we must urgently recover a degraded environmental resource.

A basic inquiry will not resolve the complex cultural tensions within the industry. Parliament and Government need to invest significant time and attention to this issue. The risk is that if these tensions are not resolved, then our inshore fisheries will be mismanaged into further decline and existing operators, be they static or mobile, forced out of the industry. Larger, consolidated multinational companies will supplant SMEs and family businesses, and fully commodify and privatise what is currently a public fishery. As bigger companies focus more on profit margins than the local communities within which they operate, money will flow out of Scottish communities, even more than it does already.