

# **Pre-budget scrutiny 2025 to 2026**

## **Submission from Clyde Fishermen's Association, 29 August 2024**

To Whom It May Concern,

With apologies, we have collated this response in a short timeframe and so its unlikely to be as in depth as we would have wished but we hope it offers some indication of our thoughts

Following the request to attend this Committee on the 21<sup>st</sup> of August we submitted a Freedom of Information request on aspects of the Marine Directorate budget and resources just to provide us with some greater clarity on allocations, however it is unlikely we will receive a response before this committee on the 4<sup>th</sup> of September 2024, but we would be happy to follow up with RAINE when any responses are received. We will add that we prefer not to use the FOI system whenever possible, and have sparingly used the process over the years, we will always attempt to speak with officials we have contact with in the first instance if this is possible/practical.

In terms of the budget priorities the 4 national outcomes of environment, communities, economy and fair work and business are our main focus.

In terms of secondary priorities we also are concerned with Human Rights, Culture and Health

### **Budget**

### **Science**

As a local regional community based small scale fishing organisation our fishing communities have long been concerned about the absence of up to date practical science, and consequently the use of best available science to form policy in the event that more current reflective data is not available.

The lack of up to date practical data can often lead to calls for precautionary closures and management measures which may not reflect a balanced approach for the reality of the small scale local fisheries.

We would support an increase in budget for baseline science with Government working with fishermen and scientists. We feel actual science would help to take a lot of the uncertainty and ideological combativeness away, and start to build baselines built on partnerships.

We completely understand governmental budgetary restraints on completing all of the “wish list” science work that fishermen would like to see, but we feel that with real co-operation we could start to develop sensible baselines on stocks at a lower cost which would help all parties. In Norway the Government work with fishermen across the sectoral scales in a reference fleet style model, we have trialled these types of schemes in the Clyde and they were starting to be very effective in building sectoral understanding between scientists, government and fishermen for a low cost, and they had also started to provide some preliminary practical science. It was a very early stage and so difficult to draw any long term conclusions on stocks, but it was the start of a much needed baseline and good partnership working. We were very disappointed this positive, fairly low cost and informative collaboration ended. We also feel this policy area became unnecessarily controversial and resource intensive following the ceasing of the science trials, had they continued that may not have been the case.

We can see that spend is being directed on projects based on computer modelling of habitat/stocks or innovation projects which all have a useful place, but when baseline practical surveys are often lacking it is a worry. We feel the baseline practical data has to be the priority and will be the most reliable measure of stocks and habitats. It's unfortunate that some science we do have can be reactionary and almost just in response to campaigns or controversial policy lobbying, and therefore it can be quite hastily planned or limited in spec/partnership or even conducted in an area which might not be a first priority.

We would like to see consistent baselines developed with trust working with local fishermen and scientists in partnership around the coast. Innovation is an excellent aspiration in science, but we need to get adequate baselines in place, and that should be the priority. Even on issues such as water temperature and its impact on stocks and habitat, some fishing boats take temperature already but it would be sensible and fairly cost effective for fishermen to work with government to feed temperature back to help inform science. These could be cheap and easy wins with boats already on the water.

We note that the absence of “neutral” governmental science can also lead to a controversial and resource intensive policy stakeholder environment, as without the adequate data, assumptions, ideologies and opinions rather than facts can start to shape the policy and PR direction of travel.

We also note that NatureScot has a budget for science and science/research projects and Marine Directorate have a budget, it may be sensible to review the scope of both, particularly in these tougher economic times.

## **Policy/FOIs/Campaigns/Legal Costs/Consultations**

I have been in post for almost 10 years, in this time I have witnessed the core role of those in fishing policy change greatly, and I worry personally this is negatively impacting sensible progress. I do not feel the changes have been positive unfortunately.

Marine Directorate have seen a reduction in the civil service staff fishermen have contact in fisheries policy over the last years, with the change in portfolios even the term “fisheries” was dropped, and some from fishing communities considered this significant. There are some excellent staff who could without doubt work with fishing communities to deliver even better outcomes, however the time now dedicated to dealing with FOIs, EIRs, Information Commissioner and legal issues with small teams means this time is not spent functionally on fisheries management or policy in a day to day sense. One Marine Directorate post with a distinct function noted they had spent a total of around 2.5 years full time work in answering requests for information. This resource is significant and when this pulled away from core implementation time on fisheries it must be assumed this has a negative impact on possible positive delivery.

Without the figures it is difficult to estimate how much resource frequent consultations, enquiries, committees, legal costs and campaigns have cost the Marine Directorate, but it can be assumed it is a significant resource. Certainly such activities have taken a great deal of resource and effort away from fishing communities and impacted their ability to engage with government. There is a fatigue in some fishing communities with the regular controversial policy areas, campaigns and consultations and the requirements on their ability to continually engage. Whilst some stakeholders may be on a wage to develop such work, fishing communities and small family businesses already have a sustainable job on top of the ever growing policies areas for engagement. There is a feeling with some fishing communities that the focus on supporting sustainable fishing and the socio-economic wellbeing of the communities who depend on it is seriously falling behind and is now diluted in comparison to the resources expended on other policy areas.

Again in Norway we are seeing positive investment in fishing from local and central government:

[New Norwegian fisheries training vessel SKULEBAS is christened \(thefishingdaily.com\)](http://thefishingdaily.com)

Meanwhile in some areas of Scotland seeing a serious reduction in fishing vessel numbers, infrastructure and trained crew. We note that a number of responders have suggested landing levies etc. It would be worth considering with the increasing costs associated with fishing from Seafish levies to additional crew and MCA costs, how reduced the ability to pay for such a scheme would be to small inshore fishing boats who are already struggling in many cases.

We do need to be careful that many fishing communities do not feel legislated out of business. We would recommend that more resource is allocated in the civil service to linking conservation policy with catching and marketing policy and business and social stability alongside environmental sustainability. We would argue that in some cases policy is operating to a degree in silos, and we have certainly seen this impact on the viability of local fishing communities, with a resulting loss of local boats. There needs to be a stronger understanding of socio-economic impacts as well as environmental impacts, and in some cases it should be understood sustainable growth of a fishery might be possible.

More Marine Directorate resource dedicated to competitiveness and sustainable business development in fisheries would be very helpful in creating positive opportunities around fishing, and not just policies many fishing communities may view as restrictive or negative.

We frequently reference how important the Highlands and Islands Development Board was in securing a future for generations of fishermen, and such a scheme would be valued now.

## **Marine Planning**

We would be interested to see the total resources dedicated to regional marine planning and the outcomes to date.

## **Monitoring**

We would be interested to see the resourcing dedicated to monitoring the Clyde fishery in comparison with other regional areas/number of boats in the area fishing, especially in comparison to the budget on science for the area. Many of our member boats feel a great deal of resource is dedicated particularly to the Clyde in relation to the size of its fishery. It would be interesting to understand how many FOIs/EIRs and reports to compliance are reported specifically for this area and how much resource this constitutes. Without this data we can't be sure how proportionate monitoring actually is.

Yours Sincerely,

Elaine Whyte, MPhil, B.A. (Joint Hons).

Executive Secretary of the Clyde Fishermen's Association