

Annex B

Management Proposals of Inshore Fisheries Groups

Respondent Information Form

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Scottish Environment LINK Marine Task Force

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Forename

2. Postal Address

Scottish Environment LINK Marine Task Force

c/o Marine Conservation Society

11A Chester Street

Edinburgh

Postcode EH3 7RF

Phone 0131 226
6360

Email Scotland@mcsuk.org

3. Permissions – I am responding as...

Individual / Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes No

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

Are you content for your **response** to be made available?

Please tick as appropriate

Yes **No**

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate **Yes** **No**

4. Environmental Impact

What are your views on the possible environmental impacts of the management proposals put forward by Inshore Fisheries Groups?

Scottish Environment LINK's Marine Task Force welcomes the opportunity to comment on the SEA of the management proposals put forward by the Inshore Fisheries Groups.

We fully support the development of these management proposals, and the involvement of non-fishery stakeholders in the IFG Advisory Groups. This involvement of stakeholders with environmental expertise, including LINK member bodies, must continue as the proposals are implemented. Getting the IFGs to the stage of having management proposals is a great achievement, and a testament to the hard work of everyone involved.

We understand the difficulties and delays involved in developing these management proposals, and so appreciate that it was perhaps not possible to ensure early integration of SEA and habitats regulations appraisal (HRA) into the preparation of the management proposal. We urge that for future iterations of inshore management plans, environmental assessment is initiated at a much earlier stage of the process.

Overarching comments

Notwithstanding our support for the IFG process to date, we would like to see a significant improvement in the environmental requirements of the IFG proposals. It is disappointing that the plans propose far fewer measures meeting the environmental high level objective (of 'maintain and restoring the quality of inshore marine environment for fisheries and wildlife') than other objectives, ie that they may contribute to the conservation of target fish species but do not address wider ecosystem concerns.

Our concern is supported by the conclusion of the SEA: ***There are few measures proposed that would reduce damage to the seabed, and few resulting benefits for the seabed and its biodiversity***

The management proposals for each IFG must address wider pressures of fisheries on marine biodiversity within the IFG area. Without this, the IFGs will not contribute to Scotland meeting its many international commitments, and Scotland and the UK may risk future infraction for failing to meet Good Environmental Status for QD 6 sea floor integrity.

The conclusion of the SEA also states that ***some of the proposals may result in positive effects on fish stocks, depending on how they are implemented***. This highlights the importance of Marine Scotland, IFMAC and the IFG Advisory Groups' continued interaction with the IFGs to ensure all proposals are implemented in ways which conserve marine biodiversity and ecosystem functions.

A significant amount of resource has gone into the development of the IFG

proposals. To ensure that this resource has not been squandered, the Scottish Government must invest in data collection, and enforcement and compliance functions which are fit for purpose and which ensure that the IFG management plans can achieve Scotland's high level objectives for inshore fisheries.

Closed areas

- We support the NW IFG proposal for Closed Areas. This management measure should be considered strategically for all inshore fisheries. Respected studies show that such management measures can act as regeneration areas, benefiting local fisheries, particularly for shellfish, through the spillover effect.
- We believe that the development of an 'eco-dredge' does not supplant the need for more closed areas in the scallop fishery. An 'eco-dredge' is a welcome innovation to limit the impact of scallop dredging in areas where scallop dredging is environmentally appropriate. However, an 'eco-dredge' should not allow dredging in new or existing areas from which any form of scallop dredging ought to be excluded for environmental reasons. The results of the Scottish Government's environmental review of scallop dredging are urgently needed to help inform strategic, spatial and sustainable management of scallop dredging, which is known to be one of the most damaging forms of fishing for seabed ecosystems.

New fisheries

- All new fishery proposals must undergo full and comprehensive environmental assessment. Proposals to exploit species such as brown shrimp, *Palaemon* shrimp etc must be carefully assessed to ensure they are consistent with a sustainable harvest strategy and that we are not 'fishing down the food chain'.
- We would not support targeting of spiny lobster as these are a scarce and vulnerable species, and a search feature for Scotland's developing network on Marine Protected Areas.
- We would not support new fisheries for sprat unless there is strong scientific evidence that these could be pursued in a controlled and sustainable manner without disruption to the wider ecosystem, including transferring further pressure onto other fish and seabird species. Sprat is an essential prey species for many of Scotland's globally important seabird populations. This is particularly important where seabirds are experiencing significant declines due to lack of sandeels, and where the availability of sprat as alternative prey is proving to be a lifeline.

State of the Environment

- This section does not adequately reflect the concerns and declines clearly set out in Scotland's Marine Atlas. We are very concerned there **'are few measures proposed that would reduce damage to the seabed'** particularly in light of the inadequate recognition of the undesirable baseline of seabed health set out in Scotland's Marine Atlas (and elsewhere).

Comments on 5.0 Environmental Baseline

- The baseline for Biodiversity, Flora and Fauna is inadequately represented. Whilst 5.3 maps ecological status according to the Water Framework Directive, section 5.2 does not reflect the serious concerns about the environmental status of biodiversity, flora and fauna in Scotland's Marine Atlas. At a bare minimum, the SEA should include the map assessments from <http://www.scotland.gov.uk/Publications/2011/03/16182005/19>. At: http://www.scotlink.org/files/policy/ParliamentaryBriefings/LINKFilenote1_MPAOct11.pdf an illustrative map displays the habitat concerns from the Atlas more plainly and also summarises a selection of species and habitat declines.
- We are concerned that the SEA concludes '**5.6.2 Damage to benthic habitats, particularly from bottom trawling and dredging, is likely to continue, with or without the management proposals. There are likely to be some indirect benefits from proposed measures to continue to seek sustainable fisheries accreditation.**' This suggests the proposals being assessed will do nothing to halt and reverse declines in benthic biodiversity and ultimately seafloor integrity.
- An SEA on inshore fishing plans that seek to ensure a sustainable future, ecologically and therefore socio-economically, ought to at least conclude that damage to benthic habitats, particularly from bottom trawling and dredging, will continue, albeit in environmentally appropriate areas and at lower levels designed to allow natural regeneration and long-term sustainability, with the management proposals. Fisheries reforms that do not make any difference to the degree of inshore seabed damage will lead to continued declines in marine benthic biodiversity, ecosystem productivity and sea floor integrity.

Comments on 6.0 Results of the SEA

- 6.1.6 We welcome moves to control effort from the static sector. We support caps on the number of creels used by an individual vessel and a limit to the total number of creels that can be deployed in a given area. A requirement to record and report catch per unit effort should be essential in any management system.
- However, we believe that controls on creel fishing should form only part of an integrated system for management of the resource and that the key to achieving a truly sustainable fishery must rest with effective management of the trawl fishery.