

Scottish Environment LINK response to the Scottish Government's preliminary consultation on a Regulating Order for the Clyde

by the Scottish Environment LINK Marine Taskforce

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Scottish Environment LINK's Marine Taskforce welcomes the proposal of a Regulating Order (RO) for *Nephrops* and Scallops in the Firth of Clyde, and supports the opening of a formal consultation to discuss the content and structure of this mechanism.

Although we consider some aspects in need of further finessing, the proposal put forward by the Sustainable Inshore Fisheries Trust (SIFT) provides a compelling model for improved management of those practices which are currently used for *Nephrops* and scallop fishing in the Clyde. We therefore would value further opportunity to consult on the proposals and help shape their structure and plan.

Landings data summarised by Heath and Spiers (2011)¹ clearly show that fisheries in the Firth of Clyde have changed from mixed finfish to two separate monocultures of scallop and *Nephrops* fishing. McIntyre *et al* (2012)² attribute this change to poorly managed fisheries, including damage to the seabed, causing a decline in the abundance and size classes of finfish in the Firth, leading them to be unviable stocks. Although we recognise that these two fisheries may be being fished within set quota limits (i.e. noting that ICES advice might be for an increase in TAC for *Nephrops* on the West Coast), we do not consider each to be managed in a way that is ecosystem-based or providing true sustainability to the Clyde. In particular we are concerned that the seabed remains in poor health and the ecosystem services it provides, for example through provision of foraging habitat to seabirds, is denuded.

We have already engaged at length in discussions about MPAs and their management in the Clyde³, which will begin to address some of the above concerns. However, noting that the

¹ Heath, M. R., & Speirs, D. C. (2011). Changes in species diversity and size composition in the Firth of Clyde demersal fish community (1927–2009). *Proceedings of the Royal Society of London B: Biological Sciences*, rspb20111015.

² McIntyre, F., Fernandes, P. G., & Turrell, W. R. (2012). Clyde ecosystem review. Scottish Marine and Freshwater Science Report, Marine Scotland Science, Edinburgh.

³ ScotLINK consultation response (August 2015) <http://www.scotlink.org/public-documents/response-to-proposed-marine-conservation-orders-for-fisheries-management-in-inshore-mpas/>

ScotLINK consultation response (February 2015) <http://www.scotlink.org/public-documents/response-to-scottish-government-consultation-on-management-of-inshore-special-areas-of-conservation-and-marine-protected-areas/>

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MPAs are designated to protect and recover particular examples of priority species and habitats in the Clyde and are not for fisheries *stock* management purposes, we welcome the RO proposal for managing the *Nephrops* and scallop fisheries across the entire Clyde ecosystem as being geographically and ecologically integrated – something we believe is needed to meet Good Environmental Status.

As indicated in the “Management of The Scottish Inshore Fisheries; Assessing the Options for Change” commissioned by Marine Scotland⁴ and the economic study undertaken by Environmental Defence Fund for SIFT⁵, there are economic benefits to better managing inshore fishing, including the use of spatial measures. This is particularly the case if management also addresses gear conflict issues, as recently highlighted in the Sea Fish Industry Authority-commissioned Pilot study: “Integrating stock management considerations with market opportunities in the Scottish inshore fisheries sector”⁶.

Regulating Orders can be an effective mechanism for ensuring that fishermen can take control of their local fishery and have a say in who has access to it, thus giving fishers a real stake in its future and securing its sustainability for future generations.

We are further supportive of the Regulating Order as a mechanism for management of inshore fishing in a way that is properly representative. The proposed Regulatory Order states that one seat would be allocated to environmental NGO representatives and one to independent scientific advice, as part of an 11 person board. This is notable given the proposed forthcoming changes to the structure of Inshore Fisheries Groups (IFGs) in Scotland.⁷ It is essential that the right governance arrangements are developed for IFGs, and their relationship to emerging regional marine planning including the Clyde established, to ensure a representative and equitable structure for the management of all of Scotland’s inshore fishing.

This response was compiled on behalf of LINK Marine Taskforce and is supported by:

Marine Conservation Society

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RSPB Scotland

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Scottish Ornithologists’ Club

Scottish Wildlife Trust

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⁴ <http://www.gov.scot/Resource/0046/00467217.pdf>

⁵ <http://www.sift-uk.org/media/file/Economic%20Impact%20of%20a%20Proposed%20Fisheries%20Regulating%20Order%20for%20the%20Clyde%20Sea%20BE.pdf>

⁶ http://www.masts.ac.uk/media/35514/wp6_output_summary_final.pdf

⁷ http://ifgs.org.uk/index.php/download_file/view/502/295/

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