

# Marine Protected Areas Network Proposals Consultation



## 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

Title Mr  Ms  Mrs  Miss  Dr  Please tick as appropriate

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### 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

- (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

- (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).

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?

appropriate

Please

Yes

tick

No

as

## Response to Consultation on Fisheries Prohibitions in the Outer Hebrides.

Scottish Environment LINK Marine Group

Date: 18 January 2016



### General Comments on the Consultation

Scottish Environment LINK's Marine Group is grateful for and welcomes the opportunity to respond to the consultation on fisheries prohibitions in the Outer Hebrides. We acknowledge the need to improve fisheries management around the Outer Hebrides and support the Outer Hebrides Inshore Fisheries Group's efforts to address this need.

We also support Scottish Government's vision for "*a more sustainable, profitable and well-managed inshore fisheries sector in Scotland*"<sup>1</sup> and note in particular the recommendation made by Marine Scotland funded research that biogenic reefs and beds should be protected from scallop dredging wherever they occur (Cappell et al., 2013)<sup>2</sup>.

Fisheries management measures should contribute to wider ecosystem health and deliver against Scottish Government's obligations and aims, including

- The protection, and where appropriate enhancement of the health of the marine area, under the Marine (Scotland) Act 2010.
- Achieving Good Environmental Status, under the Marine Strategy Framework Directive
- To encourage fishermen to recognise the ecosystem approach to fisheries management and the protection of the natural environment<sup>3</sup>

In the past 5 years we have regularly engaged in government and IFG discussion and consultation to assist in the delivery of these aims and obligations, particularly with a view to better spatial management of inshore fisheries, and particularly with regards to protecting sensitive

<sup>1</sup> <http://www.gov.scot/Topics/marine/Sea-Fisheries/InshoreFisheries/InshoreFisheriesStrategy>

<sup>2</sup> <http://www.gov.scot/Resource/0045/00450683.pdf>

<sup>3</sup> [http://ifgs.org.uk/index.php/download\\_file/view/502/295/](http://ifgs.org.uk/index.php/download_file/view/502/295/)

seabed habitats from potentially damaging activities including scallop dredging<sup>4,5,6</sup>.

We would hope that any redrafted fisheries management measures proposed by the Outer Hebrides IFG would take account of recommendations of Cappel et al. and the earlier Beukers-Stewart report to the Statutory Nature Conservation Bodies<sup>7</sup> and provide better protection to key scallop nursery and breeding areas resulting in a more productive and sustainable fisheries and a healthier benthic ecosystems. We regret that the proposals put forward here do not appear to deliver that.

This consultation response has been submitted by the following members of the Scottish Environment LINK Marine Group:

Marine Conservation Society  
National Trust for Scotland  
RSPB Scotland  
Scottish Wildlife Trust  
Whale & Dolphin Conservation  
WWF Scotland

## 1. Consultation Questions

**Q1.** Do you support changing the prohibition period for static gear fishing in the Bragar to Dell area?

Yes  No

### Additional comments

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4

[http://www.scotlink.org/wp/files/documents/ScotLINK\\_Marine\\_Taskforce\\_King\\_Scallop\\_Consultation\\_Jan2015.pdf](http://www.scotlink.org/wp/files/documents/ScotLINK_Marine_Taskforce_King_Scallop_Consultation_Jan2015.pdf)

<sup>5</sup> <http://www.gov.scot/Publications/2012/01/7927/0>

<sup>6</sup> <http://www.scotlink.org/public-documents/response-to-the-consultation-on-management-proposals-of-inshore-fisheries-groups/>

<sup>7</sup> [http://arrancoast.com/website\\_pdf/beukers\\_stewart\\_scallop\\_proposed\\_management\\_inuk.pdf](http://arrancoast.com/website_pdf/beukers_stewart_scallop_proposed_management_inuk.pdf)

**Q2.** Do you support removing the prohibition on mobile gear fishing in the Sound of Harris area?

Yes  No X

**Additional comments**

We do not support removing what is effectively a seasonal prohibition on mobile gear fishing in the Sound of Harris area. We note the presence of Maerl records within SSI 276/2004 in the area inside Loch an Siar, in waters near Duigeir and Sodhaigh Mor, and within the Sound of Harris, in waters near Killegray. We note and support the recommendation from Cappell et al (2013)<sup>8</sup> that all biogenic reefs and beds, including Maerl, should be protected from scallop dredging. Following this, these areas of Maerl should be protected from dredging pressure.

We acknowledge these areas of maerl may already be impacted by scallop dredging activity and other mobile gear outside of March – September. However, we recommend that the potential of damage to these features from additional scallop dredging pressure risks their deterioration.

We would support further restrictions – not fewer – on scallop dredging within the Sound of Harris to enable previously impacted maerl beds to recover and to contribute to the long-term protection of unimpacted maerl beds. As discussed in our preamble, protection of this habitat is in the long-term best interest of scallop fishery management around the Outer Hebrides since maerl beds are important nursery grounds for juvenile scallop.

**Q3.** Do you support expanding the seasonal prohibition that restricts scallop dredging in the Loch Maddy to Stuley Island area to include all methods of fishing for scallops?

Yes  No X

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<sup>8</sup> <http://www.gov.scot/Resource/0045/00450683.pdf>

**Additional comments**

We do not consider the environmental consequences of expanding this prohibition to be significant.

**Q4.** Do you support extending southwards the prohibition on static gear fishing in the Northern Barra, South Uist, Benbecula, North Uist and Harris area?

Yes  No

**Additional comments**

**Q5.** Do you support introducing a seasonal prohibition on static gear fishing for shellfish in the Loch Roag area?

Yes  No

**Additional comments**