

LINK Consultation Response

Proposals to close fishing for sandeel in all Scottish waters
October 2023



Scottish
Environment
LINK

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Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK Marine Group

1. Response

Question 1: Do you support the preferred option to close fishing for sandeel in all Scottish waters?

Yes

Comments:

Scottish Environment LINK Marine Group members support the proposal to close fishing for sandeel in all Scottish waters. Given the urgent need to build resilience in marine ecosystems, we support the proposal that the closure should commence 'from the 2024 fishing season onwards'.

The response to RSPB Scotland's e-action shows overwhelming public backing with more than 10,500 RSPB Scotland and Scottish Seabird Centre supporters believing a full closure is the only option that can achieve the Scottish Government's aim of managing industrial sandeel fishing activity to aid 'the long-term sustainability and resilience of the marine environment'

Question 2: If your answer is no to question 1. do you have any views on alternative or complementary measures that could be considered in the longer-term for the protection of sandeel in Scottish waters (please see the SEA Environmental Report for alternatives)?

To achieve the Scottish Government's aims, a full closure of Scottish waters is the only suitable option commensurate with addressing the scale of the threats facing Scotland's sandeel and sandeel dependent-predator populations. Any alternative measures should be rejected as being fundamentally incompatible with achieving the desired aim to increase the resilience of sandeel stocks, predator populations and the wider marine ecosystem.

Question 3: Is there any further evidence that should be considered in terms of the potential benefits or value of the preferred option that could be considered?



Comments:

The strong policy and scientific rationale for a full closure of Scottish waters to industrial sandeel fishing is clearly shown in the RSPB's sandeel report and preceding call for evidence as well as in the UK Marine Strategy Assessment, OSPAR Quality Status Report and other published scientific literature.

Sandeels are a keystone species for the wider marine ecosystem as a vital component of the food web with seabirds, seals, cetaceans and other fish relying on them as a food source. Given the size and status of Scotland's internationally important sandeel-dependent populations appropriately ambitious measures must be taken in response to protect them. Numbers of Kittiwakes, for which sandeels are a key prey species, have halved since the 1960s and, at St Abb's Head NNR, which is one of the largest colonies of Kittiwakes on the East Coast of Scotland, numbers have decreased by 74% between 1989 and 2020. Eliminating fishing pressure on sandeels is a key measure to help increase resilience in sandeel populations and dependent predators, including kittiwakes.

Sandeels are also a Priority Marine Feature (PMF) and therefore General Policy 9(B) of the National Marine Plan requires that "Development and use of the marine environment must...not result in significant impact on [their] national status". It has also been determined that sandeel PMFs would benefit from area-based protection and as such they are therefore also designated features within Scotland's Marine Protected Area (MPA) network. Given sandeels ecological importance it is a welcome step to end fishing of this species.

Ending this fishery should be seen as a vital first step in support of ecosystem resilience, with further action required to protect other forage fish from human impacts. This is especially important when you consider the added pressures on marine species such as climate change, renewable energy expansion, the avian flu outbreaks and reduced prey availability for seabirds during winter months. Within the Greater North Sea, we have not yet achieved Good Environmental Status for seabirds in the most recent UK Marine Strategy assessment. The recent OSPAR Quality Status Report further highlighted the worrying state of many sea basins, including the Greater North Sea and Celtic Seas. With 'widespread and alarming' results for seabirds, with clear links to issues with prey availability being cited, including the worrying report that 'feeding conditions not improved much' from the last assessment in 2017, clearly emphasising the need for urgent action including an industrial sandeel fishing closure in Scottish waters.

It is recognised that climate change is the biggest impact affecting sandeels, with fishing pressure exacerbating this and as such it is clear that reducing this additional pressure will go some way to allowing resilience to be built by sand eel populations to the myriad other environmental threats marine ecosystems are currently facing. Again, this must be a first step towards holistic ecosystem-based management as there is still much more that must be done urgently to tackle the twin nature and climate crises. NatureScot's Feature Activity Sensitivity Tool (FeAST) identifies changing temperatures as a significant threat to sandeels affecting their metabolic, reproduction and mortality rates. We know that Scotland's globally important seabird populations in particular are already struggling due to lack of available prey within foraging grounds due to rising sea temperatures affecting the distribution and abundance of prey species. This summer, Scottish seas experienced an extreme marine heat wave which put further stress on our already struggling marine environment. Therefore, other initiatives such as protecting blue carbon across our seas, including as part of the recently announced Blue Carbon Action Plan, must be taken forward in addition to fishery closures so they can play a vital role in climate mitigation and help build resilience in marine food webs.

As outlined in the consultation and supporting documents, a sandeel fishing closure is key to providing potential benefits to the wider marine ecosystem, including building resilience in Scotland's internationally important wildlife populations. However, such benefits can only accrue if a sandeel fisheries closure is not associated in any way with the development of marine renewable energy projects in Scottish (or wider UK) waters, as compensation (strategic or otherwise). Sandeel fisheries management is a prerequisite (as required to deliver on



a suite of environmental and fisheries commitments outlined in the consultation) for building resilience against existing threats and pressures in order to strengthen the environmental baseline, and should be framed as a discrete, standalone measure rather than offsetting (or compensating for) new, additional pressures, such as offshore renewable energy.

Question 4: Is there any further evidence that should be considered to demonstrate any impact on island communities?

Comments:

The BRIA does highlight impacts corresponding to the sandeel landings in UK ports. However as pointed out, sandeels only contribute to 1.1% of the total UK catch and quota has not been allocated since 2021 and therefore, little benefits will have been reaped by the Scottish economy in recent years from this fishery. The identified impacts must be weighed against the significant, positive environmental impacts of closing the sandeel fishery and the risks of not taking appropriately ambitious measures to protect this species which plays a critical role in marine food webs in Scottish waters.

Question 5: Do you have any comments on the assumptions made in the partial Business and Regulatory Impact Assessments (BRIA) concerning the costs and benefits of the option?

Comments:

No

Question 6: Do you have any comments on the SEA Environmental Report

Comments:

We strongly agree with the rejection of the 4 alternative management strategies and concur with the justifications for rejecting each.

We strongly agree that the 'no action' option would carry the risk of potential detrimental effects and displacement into Scottish waters given the UK Government's preferred option of a sandeel fishing closure in English North Sea waters. This urges the need for precaution and the implementation of a closure in Scottish waters before the next sandeel fishing season in 2024 to eliminate the risk of displacement.

This response was compiled on behalf of the Marine Group and is supported by: Marine Conservation Society, National Trust Scotland, Scottish Wildlife Trust, Whale and Dolphin Conservation, The Scottish Seabird Centre, RSPB Scotland.

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Scottish Environment LINK the voice for Scotland's environment

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