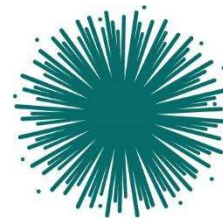


LINK Consultation Response

The Sea Fisheries (Remote Electronic Monitoring and Regulation of Scallop Fishing) (Scotland) Regulations 2024
April 2024



Scottish
Environment
LINK

The Sea Fisheries (Remote Electronic Monitoring and Regulation of Scallop Fishing) (Scotland) Regulations 2024

Consultation response, April 2024

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 organisations, 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's Marine Group

1. Response

Scottish Environment LINK welcomes the laying of legislation to require Remote Electronic Monitoring with cameras (REM) as a key tool with which to underpin sustainable fisheries management.

LINK have long advocated the roll out of REM across Scottish fisheries as it is a robust, tried and tested, cost-effective means of delivering fully documented fisheries¹. The benefits of using REM are widespread and systems can be adapted to reflect the objectives of policy or management objectives. Data from REM systems can be used not only for essential monitoring, enforcement and improved stock assessment but also the ability to pro actively evidence compliance and best practice, and provide transparency in the supply chain that will help deliver high levels of confidence in the sustainability of the fishery.

Using an REM system will, through winch sensors and GPS, provide information on *where* and *when* fishing is occurring. However what is needed in order to understand *what* is being fished – both target and non-target – is the inclusion of cameras which provide the physical evidence of what is going on at sea. It is for this reason that the technical specifications of the REM system will be critical as will the way in which any potential exemptions in the legislation are applied.

In terms of application, we support the proposed scope of REM to cover Scottish vessels wherever they fish, and to non Scottish vessels fishing in the Scottish zone. This supports our view that fishing in Scottish, and UK waters, should operate a level playing field requiring that any REM regulations should apply to all vessels fishing in our waters.

Many Scottish registered fishing vessels fish outwith the Scottish zone and it follows therefore that Scottish vessels should be required to use REM wherever they operate in order to manage fishing for Scottish caught produce. With respect to non Scottish vessels we recognise that such a requirement may mean that these vessels fishing in the Scottish zone would have more monitoring technology than their equivalents operating outwith the Scottish zone. However, we believe that such a requirement in Scottish waters could mean the

¹ FFA and LINK response to consultation on REM <https://www.scotlink.org/publication/consultation-response-remote-electronic-monitoring/>



Scottish Government play an important leadership role in bringing about the acceptance of REM by other nation's fleets. Mandating REM with cameras for vessels fishing within the Scottish zone (and for Scottish vessels fishing outwith) could encourage and accelerate the adoption of REM across the waters of non UK nations and other UK fisheries administrations.

As noted there are clear science and compliance benefits of REM where cameras are a key element of the system, such as improved stock assessments and for quota species greater certainty that what is being caught is being landed, as well as the benefits around demonstrating sustainability and improved marketability of Scottish fisheries. However, the benefits of REM go further and can be used to positive effect by the catching sector in order to increase confidence in the supply chain, gain access to market and to ground truthing claims at sea. It will be important to understand how the results of the monitoring programmes can be made available for public scrutiny in order to improve levels of understanding of fisheries operations.

For more detail please see [TransparentSea](#), produced by the Future Fisheries Alliance.

LINK believes that Remote Electronic Monitoring with cameras is a vital tool with which to underpin sustainable fisheries especially if we are to understand the true impact of our fisheries not only on the target species but on the non-target species that are impacted. We, therefore, commend the leadership being shown by the Scottish government in legislating REM for scallop dredge and large pelagic vessels as a vital first step on a journey for fully documented Scottish fisheries that will deliver great benefits to the fleet, supply chain and the marine environment.

This response was compiled on behalf of LINK INSERT Group and is supported by:
RSPB Scotland, Marine Conservation Society, WWF Scotland, Scottish Seabird Centre, National Trust Scotland,
Scottish Wildlife Trust

For further information contact:

Calum Duncan (Calum.Duncan@mcsuk.org)

Esther Brooker (esther@scotlink.org)



Scottish Environment LINK the voice for Scotland's environment



Registered office: 5 Atholl Place, Perth, PH1 5NE. A Scottish Charity No. SC000296

Scottish Environment LINK is a Scottish Company Limited by Guarantee and without a share capital under Company no. SC250899