



Clyde Cod Seasonal Closure

September 2025

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

1. The Clyde Seasonal Closure should remain in place for 2026 and 2027 in the same location and during the same time period as in 2025

Strongly agree

LINK members strongly support the continuation of the 2025 closure area and timing for 2026-27. The available evidence shows extremely low numbers of cod in surveys and important gaps in stock knowledge. Withdrawing protection while the evidence base remains weak risks further loss of spawning biomass and habitat disturbance. Maintaining the closure not only protects spawning habitat while additional targeted monitoring is undertaken, it avoids a precautionary policy reversal that could worsen stock status.

The 2024 Scottish Government consultation summary noted that Clyde cod are reproductively isolated from other cod populations - a genetically unique stock - which highlights the importance of precautionary and Clyde-specific conservation measures, rather than relying on broader efforts¹

¹ <https://www.gov.scot/publications/consultation-clyde-cod-spawning-closure-spring-2024-25/>



Dr Ana Adao's recently completed PhD research quantified significant discard levels in the Clyde, particularly from the Nephrops fishery, and modeled that cod recovery projects require substantial reductions in fishing mortality to be successful²

2. The current timing and location of the Clyde Seasonal Closure are appropriate for protecting spawning cod

Agree.

The timing of the seasonal closure aligns with long-standing protection and comparable measures elsewhere, such as in the Baltic Sea ³and the North Sea⁴. The 2022 refinement to focus on harder seabed preferred by cod is a sensible, targeted approach. However, given limited survey detections both inside and outside the closure, we recommend the timing and spatial footprint be reviewed in light of results from the proposed Targeted Scientific Programme (TSP) and any additional seasonal survey data. Until that evidence is available, the timing and location should be retained.

3. What is your opinion of the option to carry out a three-year targeted Scientific Programme (TSP) to improve the evidence base about Clyde cod

Agree.

We strongly support a well-designed 3-year TSP to fill critical knowledge gaps on local abundance of cod, spawning distribution, stock structure (residency vs migrant dynamics) and bycatch/discardings across fishing gears (including creels). Current data show spawning cod occur both inside and outside the closure nearly equally, emphasising the need for better spatial and habitat mapping. This also suggests that the current closure area may not be fully encompassing all the cod spawning locations.

However, the TSP should be conditional on retaining protection for cod and should include independent scientific review, transparent monitoring protocols, requirements for data reporting, fisher engagement and pre-defined decision points (e.g. early triggers for real-time protection spawning aggregations are located outwith the Clyde cod closure). The TSP must be adequately resourced and transparent so its outputs can inform management decisions quickly and flexibly.

² <https://pureportal.strath.ac.uk/en/studentTheses/the-role-of-discarding-in-the-dynamics-of-the-demersal-fish-commu>

³ <https://doi.org/10.1016/j.fishres.2023.106853>

⁴ https://assets.publishing.service.gov.uk/media/678f8ffc1784b7a1338e9db0/UK_National_Cod_Avoidance_Plan.pdf



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4. Should we lay an SSI that continues until the end of the TSP (2028)?

Strongly agree.

Yes – an SSI that maintains the closure through the duration of the TSP should be in place to prevent a management gap while evidence is gathered to support future decision-making. Temporarily listing protection while scientific studies are in progress risks undermining any recovery and invalidating the TSPs conclusions. The precautionary principle and the acknowledged data deficiencies set out in the consultation support maintaining statutory protection during evidence gathering.

5. The Scottish Government should work collaboratively with local fishers during the TSP to maximise data collection and improve scientific understanding

Strongly agree

Collaborative working with local fishers is essential to incorporate local ecological knowledge and increasing sampling effort to support the evidence base for cod protection measures. Collaboration must be structured and accountable - fisher participation should include mandatory reporting, agreed protocols and a requirement that any fishing activity within the closure during surveys is solely for scientific purposes and controlled (e.g. conditional on use of REM with cameras to evidence findings and support real-time reporting). Participation should not create loopholes for commercial fishing during spawning and independent scientific validation and transparent data sharing are essential.

6. What is your opinion on the Scottish Government returning the Clyde Seasonal Closure to the area, duration and exemptions that were utilised from 2002 until 2022

Disagree.

We do not support a blanket return to the pre-2022 arrangement with exemptions for certain gears. The consultation paper highlights evidence that any activity within approximately 10 metres of the seabed could disturb cod spawning activities, supported by the recent scientific advice that disturbance and bycatch are potential drivers of lack of recovery⁵. Reintroducing exemptions at this point risks undermining the protection of spawning cod and any potential positive effect the measures might have had since 2022. The area of the closure was reduced to partially compensate for the removal of exemptions.

⁵ <https://doi.org/10.1016/j.ocecoaman.2022.106154>



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If exemptions are considered, they must be evidence-led, carefully defined and based on rigorous quantification of risks (e.g. disturbance, bycatch rates - including for creeling), which is currently lacking. Until robust evidence demonstrates negligible impact from certain fishing gears, exemptions should not be reintroduced.

7. Do you have any further views on alternative or complementary management measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2026 and beyond?

LINK members agree that complementary measures alongside a retained closure for spawning cod in the Clyde are essential and should be implemented in combination with, not instead of, the closure. The 2015 study (Clarke, Bailey and Wright, 2015) showed no evidence of cod stock recovery more than a decade after the Clyde seasonal spawning closure was implemented. This is largely because the stock was already depleted and still subject to high bycatch mortality from Nephrops trawling, but it is essential to gather more data so the drivers of cod decline and reduced recovery rates can be more confidently identified. The closure alone may be insufficient to recover Clyde cod stock unless paired with broader measures and better scientific evidence. As shown in Adao's PhD research (2025), substantial reductions in bycatch and fishing mortality are also needed to support recovery of the Clyde cod population. Quantification of discarding in both creels and trawls must be included in any potential TSP and mitigation trials.

LINK members propose that other measures that should be considered include:

- Mandatory use of REM with cameras on vessels operating around the closure (during closed season) and within the closure outwith closed season, and on vessels engaged in sampling for the TSP. This will improve the evidence base and support transparency.
- Real-time or fine-scale management, such as if the TSP or fishers locate spawning aggregations of cod. Real-time temporary changes to the closure, or new closures, could be enabled to provide further protection and maximise spawning potential for the Clyde cod population.
- Bycatch mitigation measures/trials, such as through gear modification (escape panels, etc)
- Ensure alignment with the forthcoming Fisheries Management Plan (FMP) for cod, the National Cod Avoidance Plan (NCAP) review and the Firth of Clyde Sill MPA fisheries management proposals, so spawning protections are complementary and not duplicative, and take into account all aspects of cod ecology.
- Access to support and positive incentives for affected or displaced fisheries vessels, such as support to adapt gear.



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The proposed TSP should be a priority alongside retention of the spawning closure, and implementation of complementary measures, in order to refine future measures for the benefit of both fish populations and local fishing opportunities. Research priorities include:

- Further quantification of bycatch in Nephrops trawl and creel fleets, incorporating discard mortality estimates and updating recent modeling, building on Adao's PhD research.
- Fine-scale seabed habitat mapping (particularly for coarse sand/gravel distribution) to refine the footprint of the protected spawning area.

8. With reference to management of Clyde cod, do you have views on the balance between environmental protection and the socio-economic benefits provided by our fishing industry?

LINK members' position is that long-term ecological recovery is a prerequisite for sustainable socio-economic benefits for and from fisheries. Any short-term gains from fishing access during cod spawning longer-term ecological and socio-economic harm. Cod is a Priority Marine Feature and an important component of Scotland's marine ecosystems in their own right as a predator and ecological regulator.

The evidence - including data gaps and low observed cod abundance - demands a more conservative management approach until recovery is evident, in line with the precautionary principle. Long-term thinking must be embedded into marine management measures. Measures that support and enable the recovery of fish populations will deliver more reliable stock and consistent fishing opportunities for coastal communities in the future - intergenerational sustainability should be prioritised over transient gains. LINK members support the burden of short-term economic impacts of measures to protect spawning cod being mitigated fairly, but mitigation should not undermine conservation efforts.



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