LINK's response to the Proposed West Coast of Scotland *Nephrops* and North Sea *Nephrops* Fisheries Management Plans (FMPs) consultation, June 2026

Plain English Version

Glossary of terms

Bycatch - any sea creature caught accidentally while fishing for a different species. It can include non-target fish or shellfish species, or animals such as whales, sharks or seabirds.
Cetacean - a scientific term for whales, dolphins and porpoises (marine mammals)
Creel - a type of cage or basket trap, baited and placed on the seabed to catch shellfish such as crabs, lobsters and langoustine.
Marine Protected Area (MPA) - designated regions of the ocean established to protect marine ecosystems, habitats, and species from damage caused by human activities.
Priority Marine Feature (PMF) - a categorised list of marine habitats and species identified as being of significant conservation importance in Scotland.
Trawling - a type of fishing that involves dragging a large net through the water or along the seabed to catch fish or shellfish.

Response

Scotland's *Nephrops* (langoustine or Dublin Bay Prawn) fisheries are economically vital to coastal communities, and the stocks are currently assessed as being fished at broadly sustainable levels. However, LINK's view is that the two draft Fisheries Management Plans (FMPs), which cover the North Sea and the West Coast of Scotland populations (or stocks) fall well short of what is needed. As they stand, the plans are largely descriptive, restating existing arrangements rather than driving genuine improvements underpinned by targets. The language throughout is too cautious and non-committal, relying on phrases like "consider" and "explore" instead of making firm commitments with clear timelines.

The main issue that isn't addressed relates to burrowed mud habitat. *Nephrops* live exclusively in burrowed mud, a nationally important Priority Marine Feature (PMF). This means the fishery cannot be managed sustainably without also protecting the habitat it depends on. LINK's key ask is that the FMPs treat burrowed mud condition as a management objective in its own right, not just a secondary concern alongside stock sustainability.

To effectively achieve this, spatial management (i.e. strategically protecting certain areas of the seabed from the activities that damage them the most) is the key. LINK believes the evidence already exists to introduce a framework that zones fishing activity. This framework should include a strategic mosaic of areas completely closed to trawling for nature recovery, marine protected areas (MPAs) and areas to protect sensitive habitats, zones where creels get preferential access over trawling because their impact is lower, and defined areas where trawling can continue but only where sustainable use can be demonstrated. The Scottish Nature Conservation Bodies (SNCBs), such as NatureScot, have already rated seafloor damage from trawling as high risk. The draft FMPs propose forming a working group to further examine the evidence. LINK does not believe another working group is the right response to this finding as the science already supports action now.

Another issue is bycatch (the accidental capture of non-target species), which needs stronger commitments. The plans should include mandatory Remote Electronic Monitoring or REM (tracking system with cameras on vessels) across the fleet, specific measures to reduce flapper skate bycatch in trawl fisheries, and targeted action on cetacean and basking shark entanglement in creel ropes, particularly on the West Coast, where creel fishing is most prevalent. The inshore geography, existing Marine Protected Area (MPA) network, and mix of trawl and creel activity on the West Coast makes it particularly well-suited for a coherent spatial management framework. LINK supports a transition towards greater use of creels in appropriate areas, provided this is accompanied by funded support for bycatch mitigation measures from the outset.

There are still some monitoring and evidence gaps that also need to be addressed. Indicators in the FMPs should go beyond fish stock quantity to include burrowed mud habitat condition, *Nephrops* population size structure, and progress on REM rollout, discarding and entanglement incidents. The ecological role of *Nephrops* as prey for depleted species like cod also needs to be factored into harvest decisions.