

25<sup>th</sup> Jan 2015



## **Consultation on new controls in the Scottish King Scallop Fishery 2014**

The Scottish Wildlife Trust was disappointed at the lack of progress on making any of the legal changes consulted on in 2012. However, we welcome the comprehensive and informative report to Marine Scotland from Poseidon Ltd and consider there to be clear rationale for new controls.

We reiterate our view that these proposed measures must be part of a holistic strategy to ensure the long-term environmental sustainability of the scallop dredging sector. In particular the management of the fishery must play its part in halting and reversing the decline in broadscale marine seabed habitats. With this in mind we would like to see the implementation of the Poseidon review recommendations for spatial management that excludes dredge fishing from any areas that contain biogenic reef or bed habitats and the mandatory introduction of VMS for all scallop dredgers.

For further information please contact:

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### **About the Scottish Wildlife Trust**

The Scottish Wildlife Trust was founded in 1964 to take all appropriate measures to conserve the fauna, flora and all objects of natural history in trust throughout Scotland. With over 35,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages over 120 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

## **CONSULTATION QUESTIONS**

### **1. Do you support increasing the MLS of scallops?**

Yes. We support an immediate increase in the minimum landing size (MLS) of scallops to 110mm and do not believe that a phased approach is necessary.

### **2. On what basis should the MLS be increased?**

**(a) 105 around the Scottish coast**

No we support an immediate increase to 110mm

**(b) Should be increased in line with IFG requests**

No a national level of 110mm should be set.

**3. Do you support restricting the upsizing of vessels currently involved in the scallop fishery?**

Yes. The case for a cap on the upsizing of vessels and the removal of latent capacity is clear, and both measures should be implemented without delay.

**4. Do you support the introduction of a single bar length restriction within 12 nautical miles capable of carrying 8 dredges per side?**

We support a reduction of the dredge per side limit in the 6-12nm zone, creating a standard limit within the 0-12nm zone. However, the basis for maintaining the level at 8 per side remains unclear in the absence of any supporting evidence or any indication on whether the existing limit in the 0-6nm zone has delivered any discernible environmental or stock benefit.

We are concerned that this proposal would still result in Scotland having the least restrictive limits in UK and Manx waters - although 8 per side may be the national limit in England, many IFCAs have established more restrictive limits by way of byelaws.

**5. Do you support the lifting of dredge number restrictions outside 12 nautical miles?**

No. It is difficult to see how lifting these restrictions can be justified when considering protection and potential recovery of the natural environment.

We understand that this proposal would serve to limit the displacement of larger vessels into English waters where currently the fewest restrictions apply; a situation exacerbated by restrictions in Welsh, Northern Irish and Isle of Man waters. While the proposal would deliver equality of treatment within UK and Manx waters, consideration must first be given to whether the level of restriction elsewhere is adequate and should instead be raised to the Scottish level.

We strongly believe that the Scottish Government should uphold its position on the dredge per side limit outside the 12nm limit and work with neighbouring jurisdictions to consider limits holistically in UK and adjacent waters rather than conceding to remove the restriction altogether, which would result in increased effort in this zone and thus greater environmental impact and fishing mortality.

**6. Do you think that the length of time that scallop vessels spend at sea should be restricted?**

Yes. There is a clear need to implement effective and enforceable temporal restrictions given that effort has expanded to unsustainable levels and goes hand in hand with the overall cap suggested in question 3, and must also go hand in hand with spatial restrictions as recommended by the Poseidon review.

**7. Should any restriction be introduced on the basis of:**

**(a) An overnight restriction?**

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**(b) A day at sea regime?**

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