

clyde-ro@gov.scot



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## Clyde Regulating Order application

The Scottish Wildlife Trust welcomes the opportunity to comment on the Clyde Regulating Order application made by the Sustainable Inshore Fisheries Trust (SIFT) under the Sea Fisheries (Shellfish) Act 1967.

It is the Scottish Wildlife Trust's firm view that all marine activities must consider and maintain the quality, health and biodiversity of the waters it occupies, avoiding significant, cumulative, long-term or irreversible damage to the environment. In line with the Scottish Wildlife Trust's 25 year vision for a *'network of healthy, resilient ecosystems supporting expanding communities of native species across large areas of Scotland's land, water and seas'*, all activities, including fishing, must be sited appropriately, within a strategic framework of spatial planning that identifies and promotes locations where significant impacts on biodiversity are avoided and opportunities for enhancement are taken.

The Trust welcomes the Clyde Regulating Order application as an important step in effective spatial management of the Clyde, and agrees that it has the potential to make a notable contribution to the long-term recovery of the Clyde ecosystem.

### *General comments*

The proposed RO will provide valuable spatial information on fishing activities and shellfish populations that should form an important component of the forthcoming Clyde Regional Marine Plan (RMP) – a broad spatial management framework for all marine activities within the Clyde Region – and also provide relevant, up-to-date information for the upcoming Clyde Regional Marine Atlas. It is, therefore, essential that the proposed RO management plan is cognisant of the operation and management of all marine activities within the Clyde region. For example, the RO maps only show fishing activities and fail to acknowledge the spatial patterns of other marine activities that may restrict, or be restricted by, fishing activity, either spatially or temporally (e.g. shipping lanes). To implement an ecosystem approach effectively, the spatial patterns of all marine activities (in particular conflicting activities) need to be acknowledged.

To better implement an ecosystem approach, we suggest that the proposed Clyde Shellfisheries Management Organisation (CSMO) should reserve a position on the board for a member of the Clyde Marine Planning Partnership (MPP) – and likewise a member of the CSMO should be included in the MPP Advisory Group. This could go some way to truly integrating the two

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management plans and facilitate an exchange of knowledge and data between them to assist with decision making. In Scotland's National Marine Plan (Sea Fisheries policies, Objective 5) it states:

*'Management of fisheries on a regional sea-basin ecosystem basis with appropriate stakeholders empowered in the decision making process and, where appropriate, ecosystem-based management of inshore fisheries at local level, on the basis of participative management with interested stakeholders and involving both Marine Planning Partnerships and Inshore Fisheries Groups.'*

As both the Clyde RO and RMP are in developing stages, there remains an opportunity to fully integrate shellfisheries management objectives into the broader, more holistic framework of the RMP and truly implement an ecosystem approach to marine management.

The establishment of the Clyde Scientific Trust (CST) would also be equally beneficial to the Clyde MPP as well as the CSMO. The data/research provided by the CST could inform the RMP with up-to-date information and aid decision making. Sharing research targets, data, and resources would be beneficial to both parties. This is of particular importance if the CST plan to establish a novel, 'bespoke' monitoring strategy. It is not clear from the RO why a 'bespoke' approach is required and our concern centres on the compatibility of the collected data with current (or past) monitoring programmes. To ensure the data collected would be of value to all stakeholders and marine planners, we recommend reconsidering the value of creating a bespoke monitoring strategy and instead look to improve and/or bolster current monitoring approaches.

We consider that the inclusion of an MPP member within the Advisory Group of the CST would be highly beneficial to both parties. For example, the MPP can highlight gaps in our wider knowledge of the Clyde environment, many of which the CST may be able to fill, thus providing a broader, multi-sector application of collected data.

#### *Presentation of information*

The colour coding used in the map of Nephrops trawling and scallop trawling activity (Figure 9, p.72) is highly misleading – traditionally red indicates high activity and blue/purple indicates low activity. The two activities should be presented in separate maps, as they have been in the appendix, to avoid any confusion over when certain fishing activities take place.

Yours faithfully,

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