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Consultation on the Proposed Introduction of New Statutory Scallop Fishing Management Measures.

Introduction

The Scottish Wildlife Trust is pleased to have the opportunity to comment on the proposals in the above consultation. This response should be read in conjunction with that of Scottish Environment LINK, which we fully endorse. In particular we would like to reiterate the call for a strategic management plan for scallop fisheries in Scottish waters to help ensure the fishery plays its part in halting and reversing the observed decline in broadscale marine habitats.

The Scottish Wildlife Trust believes that the adoption of management measures that deliver both healthy ecosystems and productive fisheries is achievable. Such management should utilise a range of measures such as minimum landing sizes, gear modifications, effort restrictions and area closures to achieve true sustainability. With this in mind, beyond the technical measures in the proposed Order, we await with interest any proposals to establish a strategic, ecosystem-based approach to the management of the Scottish scallop fishery. We would welcome any opportunity to participate in the development of such a strategy, which we believe must be well-informed, with decisions based on best available evidence and must be fully integrated with the Scottish Government's objectives for marine conservation.

Consultation

We can see just two aims of the proposals: to safeguard scallop stocks and to align Scottish measures with those in England. We are disappointed that the consultation fails to include in its aims any reference to improving the sustainability of scallop dredging or addressing the widely accepted position that scallop dredging can reduce biodiversity and habitat complexity in fishing grounds. We believe that fisheries management proposals must include consideration of environmental protection objectives and we would like to see greater evidence of a joined up approach between the respective work areas *within* the Scottish Government in these and any future proposals. As above, we believe there is an urgent need for a strategic management framework for the sector involving the full range of interested parties.

It is critically important that any new measures are underpinned by sound evidence. However, the consultation document fails to provide any sufficient justification or evidence to show that the proposals will meet either the stated aims or the protection and enhancement of the wider environment. We would welcome the publication of any further information regarding these proposals.

Do you support the introduction of a flat rate 8 per side limit on dredges within the 12 nautical mile zone?

We support the 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 is 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 would welcome the publication of further information on this point.

Protecting Scotland's wildlife for the future

Do you support the removal of restrictions on dredges outside 12 nautical miles of the Scottish coast?

No, it is difficult to see how lifting these restrictions can be justified when considering environmental protection.

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 the UK and EU, 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 the Scottish Government should uphold its position on the dredge per side limit outside the 12nm limit rather than conceding to remove the restriction altogether, which would undoubtedly prove to have negative environmental consequences.

Do you support exempting from regulation, attachments to dredges whose purpose is to increase the safety and speed with which dredges can be handled?

While we can fully support this technical measure to make clear that attachments for the purposes of safety are not prohibited, we would be concerned about any unintended consequences where the exemption is used to either reduce the selectivity of the dredge or add weight to the dredge placing pressure on the seabed and benthic fish stocks. Therefore, we would expect such a measure to be clearly defined and strongly enforced.

Would you support the introduction of a phased increase in the minimum landing size for scallops from 100mm to 105mm and then to 110mm?

We support an increase in the minimum landing size (MLS) of scallops from 100mm to 110mm. However, if the ultimate aim is for an increase to 110mm we see no reason, and no rationale is presented, for the phased approach that would see an interim 105mm MLS. We would like to see the publication of the basis and consequences of the phased approach before we could support such a move.

Do you agree that all scallops landed into Scotland and carried within the Scottish zone must comply with the Scottish minimum landing size?

Yes, we agree this would be a pragmatic approach to ensure effective enforcement.

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.