



Finlay Carson MSP
Convener
Rural Affairs & Islands Committee

19th December 2025

Dear Convener,

Clyde Seasonal Closure

The Scottish Government's consultation on the Clyde seasonal closure ended on 25th September, at which point SIFT raised serious concerns in the [media](#) about the consultation process and about the misrepresentation of science within it.

It is our view that none of the options proposed in the consultation align with the science. That science is now clearer even than it was when your Committee considered the [previous statutory instrument on this subject](#), which came into effect on 14th February last year.

The ideal outcome now would be for Ministers to recognise that this process is fatally flawed and to return with a new consultation which accurately reflects the science. This would require the inclusion of technical measures for the Nephrops fishery year-round to reduce bycatch, as well as year-round spatial management, as per the Dr David Bailey paper cited by [Marine Directorate](#).

The next best outcome, should Ministers bring forward any of the options proposed in the consultation, would be for the Committee to reject them and explain why. All the options are incapable of recovering cod stocks, even as they are also detrimental to the low impact fishing sector.

The shortcomings of Marine Directorate's science on this subject were known in outline terms when the excellent SPICe blogposts on the subject were written in September last year ([part 1](#), [part 2](#)). However, as discussed above, we now know much more.

The PhD by Ana Adao, discussed by you and your colleagues in 2023, and in the second of those SPICe blogs, has now been completed, and it is entirely damning of Marine Directorate's approach. In line with the commentary from SPICe last year on bycatch, the paper says:

"A number of technical measures to reduce bycatch have been already implemented in the Clyde Nephrops fishery, and these might explain to some extent the decreases of bycatch quantities of whiting and haddock between 2002 and 2019. However, current mortality on cod and whiting is still too high and needs to decrease on these stocks for any chance of recovery to happen, so other bycatch mitigation strategies could be explored further."

The prospects of success associated with repeating the same mistakes are also evident in the Adao PhD:

"Overall, at current levels of fishing mortality from the Nephrops fishery operating in the Clyde, the chances of recovery for the whiting and cod stocks are minimal."



Sustainable Inshore Fisheries Trust

We share the view of the Scottish Creel Fishermen's Federation, as reported by media, that the use of a version of this seasonal closure since 2002 represents over 20 years of failure. The case for Marine Directorate's seasonal closure proposals last time was weak at best: now it is indefensible.

The Clyde can and should be more than just a shell-fishery, although it could and should be a more successful shell-fishery. Recovery of cod stocks, the ostensible aim of these measures, is worthwhile, although it would be slow and require a change of direction. A continuation of the same failed measures is getting us no closer to a more diverse and robust Clyde fleet.

It is telling that the initial Marine Directorate consultation included inaccurate summaries of the relevant science, including both the paper co-authored with Dr David Bailey and Ana Adao PhD, summaries on which the proposed measures in theory rested. When those summaries were corrected, the measures proposed were not changed, even though the evidence was clear: they have not worked and they will not work. The changes mid-consultation are set out in an annex below.

This letter is also in part a follow-up to the letter I sent to you and your Committee colleagues in early 2024 on the subject of the Clyde cod box.

I am aware that the Committee has an intense workload in the run-up to dissolution, and there may not be time for a full panel on the forthcoming statutory instrument on this topic. However, if at all possible, I would recommend at least hearing from the scientists discussed above, and/or Dr Robin Cook, who was the chief scientific advisor at the Scottish Government's Marine Laboratory and who supervised Ana Adao's work. If there is anything else I can do to help the Committee with this process, please do let me know.

Yours sincerely

Charles Millar
Executive Director
Sustainable Inshore Fisheries Trust

ANNEX

The discrepancies between the two versions of this Scottish Government document are set out below. Both PDFs are available on request.

Paragraph 10 was:

In August 2015 a scientific paper entitled Evaluating the effectiveness of a seasonal spawning area closure³ was published in the ICES Journal of Marine Science. ~~This paper found little evidence of exchange between Clyde cod and northern stocks, instead revealing closer genetic similarity with cod in the Irish Sea. This separation implies that the Clyde cod population has limited reproductive capacity compared to larger, more connected populations, making it vulnerable to environmental changes and fishing pressure. While ICES advice states that Clyde Cod is likely to be a distinct stock, the current availability of data is insufficient for it to be treated as such for assessment purposes.~~

Paragraph 10 then became:

In August 2015 a scientific paper entitled Evaluating the effectiveness of a seasonal spawning area closure was published in the ICES Journal of Marine Science. **This paper concludes that there had been no recovery in terms of stock size or reduced morality after more than 10 years of the previous closure, and suggests that this could have been due to factors such as bycatch in the Nephrops fleet and/or increased predation by whiting. It further suggests that spawning area closures may be insufficient when the stock size is too low to withstand environmental fluctuations and additional sources of morality.**

(note: “morality” in both instances is as published, and should read “mortality”)

Paragraph 11 gained an additional final sentence:

Cod in the Firth of Clyde are subject to quota management as part of the ICES Area 6.a management unit. Following a benchmarking exercise which concluded in February 2023, the previously separate assessment units for area 4 (North Sea) and area 6a (West of Scotland) cod were combined into a single Northern Shelf cod assessment unit. The newly defined stock includes three substocks: northwestern, Viking and southern. The northwestern sub stock covers the principal Scottish fishing waters of areas 4 and 6.a, including the Clyde region. **While ICES advice states that Clyde Cod is likely to be a distinct stock, the current availability of data is insufficient for it to be treated as such for assessment purposes.**

Paragraph 15 was:

A PhD thesis by Ana Adao on ‘The Role of Discarding in the Dynamics of the Demersal Fish Community in the Firth of Clyde’ provides a useful assessment model for Clyde cod. This thesis set out to ~~[investigate how cod populations are distributed and structured in the Clyde and whether current fisheries management boundaries reflect the biological reality of these stocks. This research found that cod populations in the Clyde are now concentrated in fewer, more limited locations than in the past, indicating a decline in the area they occupy. Using detailed catch data from commercial Nephrops trawlers, this study further showed that cod are not genetically distinct across current stock boundaries, indicating a level of movement or connectivity between separated populations].~~ This thesis also highlights that Nephrops trawl fisheries regularly catch cod as bycatch, ~~which may be contributing to localised declines.~~

Paragraph 15 is now:

A PhD thesis by Ana Adao on ‘The Role of Discarding in the Dynamics of the Demersal Fish Community in the Firth of Clyde’ provides *potentially* useful assessment models for Clyde cod, ***haddock and whiting. This thesis set out to a) develop estimates of discards of these species from Nephrops trawl fisheries; b) incorporate these estimates into new stock assessment models; and c) use these models***



Sustainable Inshore Fisheries Trust

in simulations of future stock developments under different hypothesised mortality and recruitment scenarios. This thesis highlights that Nephrops trawl fisheries regularly catch cod as bycatch, and concludes that cod are unlikely to recover under current levels of fishing mortality.