

Clyde Cod: Issues and Omissions in the Consultation Outcome Report

Note from the Scottish Creel Fishermen's Federation

Question Set A – For Government, Officials & Scientific Advisers

(Scrutiny of decision-making, evidence use, and competence)

Directed at representatives of the **Scottish Government** and **Marine Directorate**.

A1. Evidence and Proportionality

1. **What evidence shows that creel fishing makes a meaningful contribution to the failure of cod recovery in the Clyde?**
 - If there is little or no such evidence, why was creel fishing excluded alongside trawling?
 2. **Was any attempt made to compare the scale of disturbance caused by creel fishing and trawl fishing?**
 - If not, why were they treated as equivalent risks?
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A2. Known Mortality vs Uncertainty

3. **It is widely accepted that trawl fisheries account for most cod mortality in the Clyde. Why has action on this known source of mortality been delayed?**
 4. **Why is uncertainty about smaller or hypothetical impacts (such as creel bycatch or disturbance) treated as a barrier to action, when the main source of harm is already well evidenced?**
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A3. Use of the Precautionary Principle

5. **How has the precautionary principle been applied in practice across different fishing methods in the Clyde?**
 6. **Why has precaution been used to justify excluding low-impact fishing, but not to justify further restrictions on high-impact fishing where evidence of harm is clear?**
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A4. Alternatives and Options

7. **Were alternatives such as spatial limits on trawling, reduced trawl footprint, or stronger selectivity requirements formally assessed?**
 - If so, where is that assessment set out?
 8. **Why were low-impact fishing priority areas or preferential access for creel fisheries not trialled as part of the response?**
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A5. Three-Year Science Programme

9. **What specific management decision is the proposed three-year scientific programme intended to inform, given that the dominant source of cod mortality is already known?**
 10. **How does delaying further action on trawling for several years align with precautionary and ecosystem-based management objectives?**
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A6. Transparency and Accountability

11. **Can the Committee see the analysis showing how different management options were compared and rejected?**
 - If not, why has this analysis not been published?
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Question Set B – For Academics, ENGOs & Industry Witnesses

(Expert judgement, solutions, and what “good management” would look like)

These questions avoid assigning responsibility, and instead invite **professional opinion and solutions**.

B1. Effectiveness of Current Measures

1. **Based on the available evidence, do you believe the current measures are likely to deliver recovery of Clyde cod?**
 - If not, why not?
 2. **Do the current measures address the main source of cod mortality in the Clyde?**
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B2. Low-Impact Fisheries as Part of the Solution

3. **Do you consider creel fisheries to be a low-impact activity in the Clyde relative to trawling?**

4. **Would you support creel fisheries playing a positive role in cod recovery, for example through preferential access or low-impact fishing zones?**
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B3. Selectivity and Gear Measures

5. **Would you support the use of proven selectivity devices in trawl fisheries, such as grids designed to reduce cod bycatch?**
 6. **Do you believe such measures could materially reduce cod mortality while allowing some level of trawl activity to continue?**
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B4. Spatial Management

7. **Would you support reducing the spatial footprint of trawling in the Clyde as a way to protect cod while maintaining fishing activity elsewhere?**
 8. **From an ecological perspective, do low-impact fishing priority areas represent a credible management tool in the Clyde?**
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B5. Assessment of Government Approach

9. **Do you feel the Scottish Government has adequately explored the full range of available management options to address cod decline in the Clyde?**
 10. **If not, what additional or alternative measures would you consider more appropriate or more likely to succeed?**
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How the Question Sets Are Intended to Assist Scrutiny

- **Set A** tests **whether decisions were competently and proportionately made.**
- **Set B** helps establish **what credible alternatives exist** and whether expert witnesses believe the current approach is fit for purpose.

Together, they allow the Committee to assess not just *what* was done, but **whether better options were reasonably available and ignored.**

SCFF's core concerns

There is no credible evidence that creel fishing meaningfully affects cod spawning or recovery in the Clyde. What evidence does exist points overwhelmingly toward mobile gears as the primary source of disturbance and mortality. The Scottish Government are not proposing any measures that address the mortality issue or that are otherwise capable of achieving the strategic objective of reviving Clyde cod populations.

The current approach appears disproportionate, inconsistent, lacking in transparency, and unlikely to achieve the stated objectives of protecting or reviving Clyde cod populations.