

Dear Convener and Members of the Rural Affairs and Islands Committee,

Following today's first evidence session on the Clyde Cod SSI, we wanted to offer a brief synthesis of what we heard from witnesses, and to highlight what we believe are the key issues for scrutiny ahead of the Committee's forthcoming session with the Scottish Government.

Across academic, fishing (static and mobile) and conservation witnesses, there was striking consensus on several core points:

- **The status of Clyde cod is critical and constitutes an emergency.** Professor Michael Heath described biomass levels as being so low that urgent action is required.
- **The problem is not confined to cod alone**, but reflects wider ecosystem degradation in the Clyde, reinforcing the need for action now rather than further delay.
- **As currently proposed, the Government's measures are not fit for purpose** and were widely regarded as incapable of delivering cod recovery.
- While there was debate about the precision of elements of the science, there was clear agreement—particularly from academic and conservation witnesses—that **there is more than sufficient evidence to act immediately to reduce cod mortality**.
- In that context, Professor Heath stated that the case for “disturbance” being a material driver of poor cod recruitment, particularly as a justification for excluding creel fishing, was “*spectacularly weak*”.

There was also broad agreement that:

- **Cod mortality, not disturbance, is the central problem**, with the evidence consistently pointing towards bycatch in the Nephrops trawl fishery as the dominant source.
- The current proposals impose **disproportionate impacts on the static fleet**, despite general agreement that creel fishing is among the least impactful gears in terms of cod recruitment.
- **Area closures without wider management measures simply displace effort elsewhere**, failing both conservation and socio-economic objectives.

In light of this, we would strongly encourage the Committee to ask the Marine Directorate to return with a **clear set of alternative or additional measures** capable of materially reducing cod mortality, so that these can be properly assessed.

At a minimum, two well-established options warrant serious consideration:

1. **Mandatory selectivity devices in Nephrops trawls**, which are already known to reduce cod and other demersal finfish bycatch by 80% or more without materially affecting Nephrops catch.
2. **Low-impact fishing priority areas** (for example creel-only or static-gear zones) on productive muddy Nephrops grounds, which can reduce bycatch and disturbance while maintaining employment, increasing jobs per unit of

resource, and lowering the environmental footprint of the fishery.

Both options are consistent with an ecosystem-based approach and address mortality directly—the issue witnesses repeatedly identified as the core problem.

Finally, we note that immediately prior to this evidence session, the Scottish Government opposed amendments on low-impact fishing priority areas during Stage 3 of the Natural Environment Bill, arguing that such mechanisms already exist under the Marine (Scotland) Act 2010 and the UK Fisheries Act 2020. If that is indeed the case, a legitimate question arises as to **why these powers have not been used** in the Clyde to date, and why they have not formed part of the current SSI proposals. We hope this short note is helpful as the Committee prepares for its next evidence session, and we would be very happy to provide any further clarification if useful.

Kind regards,
Alistair Bally Philp
SCFF Coordinator