

Petition PE1951: Reinstate inshore coastal limit on the use of dredge and trawl fishing gears

Submission from the Sustainable Inshore Fisheries Trust (SIFT)

Introduction

The Sustainable Inshore Fisheries Trust (SIFT) is a Scottish charity (SCO 42334) promoting the sustainable management of Scotland's inshore waters so that they provide the maximum long term socio-economic and environmental benefits to all Scotland's coastal communities. This submission sets out SIFT's position on the advantages of spatial management in the inshore.

There is clear evidence that spatial management (i.e., managing activity based on location) is an important component of effective fishery management. Indeed, the Bute House Agreement refers to measures which "could potentially include spatial management", which if properly implemented have the potential to turn around the 40-year decline in our inshore fleet and mitigate many of the pressures currently experienced by the sector.

Spatial management is often used in concert with other measures, such as seasonal closures, restrictions on the type of fishing gear, or landing size limits. Scientific data in support of this approach is supplemented by the experience of those directly working in fisheries.

It was the latter's experience that underpinned the introduction of Scotland's historic 3 Mile Limit, when almost all fishing with mobile gears was banned within 3 nautical miles of the shore. This measure protected inshore nursery areas for young fish which, on maturity, 'spilled over' the boundary of the limit into open fishing grounds and supported a sustainable finfish fishing industry. The 3 Mile Limit was fully lifted in 1984 and SIFT believes that this was central to the subsequent decline of the inshore fisheries, and the inshore's biodiversity.

Given the above, proposals to reinstate a modern equivalent of the 3 Mile Limit are appealing. So SIFT supports the petitioner's call for the reintroduction of a modern inshore limit which incorporates a fisheries management regime which is ecosystem-based, i.e. takes into account scientific evidence of the interactions between organisms and their environment. We set out, below, our case for why a new inshore limit must incorporate the ecosystem-based approach.

The potential limitations of an Inshore Limit determined solely by distance from the shore.

Fishery management in Scotland must adhere to the ecosystems approach (a defining principle of the 1995 UN Code of Conduct on Responsible Fisheries, the 1992 (OSPAR) Convention on the Protection of the Marine Environment in the North-East Atlantic).

SIFT's concern about the simple former 3 Mile Limit, in essence, is that there are habitats beyond 3nm which need protection and, conversely, there are habitats within 3 miles of the coast (e.g. muddy or sandy sea beds) which can be sustainably trawled or dredged for shellfish. In 2015, [SIFT submitted an application for a Regulating Order for the Firth of Clyde](#). In that application, we set out several key design considerations to be taken into account:

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- Multiple habitat types must be protected in order to support marine biological diversity and the sustainable use of these habitats. Arbitrarily defining a protected area (whether it be a 3 Mile Limit or proposals for a limit nearer the shore) is not an effective way to ensure all representative habitats are protected;
- Complex and important substrates (as well as habitats) must be protected in order to aid dispersal of fish stocks around a protected area. The area within a 3 Mile Limit may not include all such substrates, and may also unduly close areas which could be opened;
- Spatial protection must promote connectivity, i.e., ensuring populations in different geographical parts of a species range are linked by the movement of eggs, larvae, juvenile or adults. Maximising connectivity also gives additional ecosystem benefits, such as the transfer of nutrients and energy. There will be places where that connectivity would not be delivered by a 3 Mile Limit, but could be achieved without increasing the overall area protected, simply by drawing a boundary lines which more accurately reflect the ecosystem;
- The length of perimeter of protected zones should be high in relation to their area, as this will increase the potential for spill-over benefits for the fishing industry. A 3 Mile Limit would typically generate boundaries with a lower ratio than one based on the seabed characteristics and would therefore be likely to provide fewer sustainable fishing opportunities.

SIFT believes that a modern inshore limit can be designed with these considerations in mind. This would ensure the inshore waters support sustainable fisheries employment alongside a recovering environment - which would bring further benefits to fisheries and other users.

Conclusion

SIFT believes that Scottish inshore waters should be subject to a spatial management regime that establishes a modern equivalent of the former 3 mile limit for dredge and seabed trawl fishing gears. In contrast to the former 3 mile limit, this

should take into account an ecosystem-based approach to fisheries management, so that specific exceptions to the hard boundary of the 3 mile limit could be made – dependent upon the substrates, species and habitats on the seabed – along with specific socio-economic justifications and not simply with reference to distance from the shore.