

# Dennis Archer submission of 22 August 2022

## PE1951/L Reinstate inshore coastal limit on the use of dredge and trawl fishing gears

Did the Thatcher government have any scientific evidence when it abolished the 3 mile limit in the 1980s? Yes, they did, but the word 'sustainable' had hardly been invented and we had no idea there was a biodiversity crisis. They had some excuse for prioritising economic growth and probably little idea that they were about to commit environmental vandalism. In any case, contemporary evidence suggests that scrapping the limit was supposed to be only the first step in replacing it with something more selective and effective. Sadly, 40 years later, this step has still not been taken.

In the 2020s, the Scottish Government has no excuse for perpetuating this devastating Tory policy and should know better.

It has to be said that the submissions by the SCFF read as though written by people who know what they are talking about. The response by the Scottish Government reads to me like a catalogue of excuses, desperate to continue permitting practices that they know are indefensible. So much talk of strategies, step changes and policies which seem to be a cover for inaction and ineffective management over a long period.

Dredging the seabed is a damaging and destructive business. Doing it in inshore coastal waters inevitably maximises the potential damage, given the key nature of these areas for ecosystems and biodiversity. Anyone who has ever seen a bulldozer at work and who has a basic understanding of marine biology, should have little difficulty in imagining the effect dredging has on the seabed. I would suggest that even the people using this method are aware of the damage it causes.

If we are to look for evidence, the SCFF have provided plenty of compelling evidence in [their response to](#) the Scottish Government's submission. The Scottish Government have provided little or nothing to refute this. The graph showing historical catch data for various species over the period 1960-2010 is compelling evidence of a serious decline in biodiversity.

The attitude of the Government to evidence is hypocritical. Consider the behaviour of Marine Scotland over the recent Judicial Review and

Appeal against it, which they eventually won. This can hardly be interpreted as anything other than a desperate attempt to prevent evidence which might make their position difficult to defend from being collected.

Consider the evidence provided by the ecosystem recovery achieved around the No-Take Zone off Arran – to the benefit of everybody. The message here is obvious – the more nature is left to its own devices, the better recovery will be.

Consider the evidence of Marine Scotland's failure to achieve results over the past decade. Their failure to achieve promises over vessel tracking, their failure to introduce any system of spatial management and their failure to achieve proper protection for the current MPA network. The SCFF are correct. All the evidence suggests that Marine Scotland are not successfully managing the seas, have no plan for doing so in a reasonable timescale and should adopt an entirely different approach or at least a more vigorous one.

Let's be clear. The SCFF are not advocating a blanket 3-mile inshore limit to be reimposed. They are pleading for some urgent, effective spatial management. This may be a difficult task to achieve in a hurry with any degree of precision, but it cannot be doubted that to return to a starting point where bottom scraping methods were prevented in a 3-mile area on the west coast would lead to a huge improvement in the state of our seas, but obviously at some cost to the destructive fishermen. This latter point would give the Scottish Government some incentive to relax restrictions just as soon as evidence could be provided in specific areas.

At the moment, as the SCFF correctly say, we have a blanket 'dredge anywhere' policy. No blanket policy is desirable, but the one we have is disastrous. If we cannot immediately be more fine-grained and subtle, then far better to start from the opposite position and relax from that. Better for everyone in the end, as stocks recover.

Let's not pretend that Highly Protected Marine Areas (HMPAs) are a solution. They are problematical and will arrive painfully slowly if past performance of the Scottish Government is anything to go by. They will also exacerbate some problems, as the SCFF correctly point out, particularly competing claims over reduced space.

Also, let us not pretend that the SCFF are a lone voice in their request for some urgent action. As they point out, there are 130 organisations supporting them via the Our Seas initiative. I imagine that support for the

status quo extends no further than the Scottish Government, Marine Scotland and those who engage in destructive fishing methods.

The stubborn refusal of those in authority to see that the status quo is not an option is only comprehensible because one knows their comparable approach to aquaculture since the [Rural Economy and Connectivity Committee Report](#) of 2018. It fits a patten.

Truly, a balance needs to be achieved between environmental protection and economic exploitation. What we have at the moment is a complete imbalance and an indefensible bias towards short term economic development. In the long run it will probably lead to great economic loss to everyone.