

COAST submission of 24 August 2022

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

The Community of Arran Seabed Trust (COAST) support the Scottish Creel Fishermen's Federation (SCFF) petition to reinstate an inshore limit restricting mobile dredge and bottom-trawling fishing gears.

COAST was established in response to the catastrophic decline in fish stocks, damaged seabed habitats and loss of marine life around Arran and the wider Clyde resulting from fisheries management that allowed continued over-fishing and, most crucially, the removal of the inshore limit previously preventing mobile bottom fishing in inshore waters. The latter resulted in trawling and dredging destroying previously healthy seabed habitats with resultant loss of essential fish habitats and marine life. There is ample evidence in the scientific literature of the impact of mobile bottom-towed fisheries on seabed habitat integrity and biodiversity that supports this view.

These impacts were felt through the Clyde and directly on Arran, locally evidenced by the collapse of the once lucrative fisheries and angling businesses throughout the Clyde (the loss of many millions of pounds). On Arran, the annual angling festivals stopped in the 1990's due to the lack of fish to catch. In the Clyde, as in much of Scottish inshore waters, fisheries are now just scraping the bottom of an impoverished food chain, with repeated trawling and dredging over large areas preventing habitat and ecosystem recovery, and continually damaging blue carbon habitats.

Establishment of spatial management areas for fisheries through the Lamlash Bay No Take Zone and South Arran Marine Protected Area (MPA) has provided an opportunity for seabed habitats and marine life to recover. Research shows that within the MPA, where static gear fishing and angling are permitted through most of the area, the total density of marine life has more than doubled. The abundance of king scallops has increased significantly, providing an important resource for scallop divers to benefit from, and there is evidence of spillover of lobsters from the No Take Zone with creel fisheries in the MPA able to benefit from recovering seabed productivity. This is clear evidence of how spatial measures are supporting seabed recovery with increased productivity and ecosystem function, as well as protecting important blue carbon

habitats. Local fishermen, residents, visitors and businesses are witnessing the benefits of a previous Scottish Government's decisions to protect parts of the inshore waters around Arran from trawling and dredging.

Overall, however, all indicators for the health of Scotland's inshore waters show continued decline. We are far from achieving Good Environmental Status and Scotland's 2020 Marine Assessment showed that biodiversity within our inshore waters is continuing to decline and seabed habitats are being lost and further degraded. Not only that, but fish stocks too are also continuing to decline.

Piecemeal measures will not stop this decline. The Government's response to the SCFF petition is ignoring the science and existing evidence about how removing the impacts of trawling and dredging supports improved seabed and ecosystem health and productivity. Some of the comments in the Government's response are frustratingly misleading and disingenuous:

- There is already a ban on bottom trawling in all areas deeper than 800m, so clearly implementing wider spatial management is possible and supported by existing Governmental action. So why not in the inshore? Such a limit used to exist around the Scottish coastline and the inshore marine environment was far better for it.
- Scotland's inshore waters are in an impoverished state as targets and indicators show. To ignore or underplay this is dangerous and negligent.
- Although 37% of Scotland's sea area is within MPAs, less than 5% is actually protected from trawl and dredge fisheries.
- Scottish Government is talking about making a step change in marine protection – this needs to be a joined-up spatial management approach.

Fisheries are a public resource and not the domain of one sector of the fishing industry. As a community-based organisation established by members of the public, we fully support the SCFF's call for a reinstatement of an inshore limit. It is time for urgent and informed decision making to reverse damage and losses in our inshore waters and enable more productive seas and sustainable use of them. How long do we have to restore marine ecosystem function and productivity?

We need to remember how the inshore waters around Scotland used to be: teeming with life, highly productive, abundant with white fish stocks, community engagement in fisheries (commercial and recreational).

Currently this is not the situation; but it could be, if the Scottish Government genuinely wants to see a recovered, healthy, and productive marine environment by making the far-sighted decision to reinstate an inshore limit on trawling and dredging and support sustainable lower impact fisheries within that.