



Comments on Clyde Inshore Fisheries Group: Draft Management Plan July 2011

Arran is one of the largest and most accessible islands off the west of Scotland. The community campaigned long and hard to protect the maerl beds in Lamlash Bay from destructive mobile bottom trawling for *Nephrops* and dredging for scallops so the bay would have a chance to return to a healthy benthic ecosystem, which would benefit the whole marine environment. The 67 mile coastline of Arran is an important recreational tourism asset. Arran attracts people from all over the UK and abroad, and there is certainly potential to increase visits to the island through conservation of the marine environment. Sea angling, a shadow of its former popularity and income generator in the 1980s, could return along with regenerated biodiversity, sustainable bottom ecosystems and white fishery stock.

In reviewing the Draft Management Plan, COAST has considered three main areas:

1. How the Plan fits with the public resource nature of fisheries
2. How the Plan looks at the potential for restorative processes of the benthic and biodiversity of the Clyde, especially with respect to white fish stocks and sea bed ecosystems
3. How the IFG under its constitution will be accountable to the public

1. How the Plan fits with the public resource nature of fisheries

3.1.1. There are no Clyde based creeler representations on the IFG Executive. Further there is no democratic mandate on the IFG Executive and yet the fishery is a public resource.

3.2.1. It is unclear what role the advisory group had in drawing up the draft management plan. It is clear that the IFACA in England have a much more representative executive committee of interested parties and a model on which to build consensus.

3.3. COAST objected at the outset of the IFG process to the narrow constituency as defined by the constitution of the Clyde IFG. How can the Clyde IFG produce a feasible management plan when anglers and local community interests are not represented on the Executive? Further both Clyde based creeler organisations resigned approx. one year after the Clyde IFG was instigated in January 2009. How can high level objectives and local objectives be made in isolation of community stakeholders?

2. How the Plan looks at the restorative process of the benthic condition and biodiversity of the Clyde, especially with respect to white fish stocks and sea bed ecosystems

2.3 There is no reference to the widely acknowledged collapse of white fish stocks in the Clyde, and therefore, not surprisingly any long term vision presented for Clyde fisheries.

4.1. Why are there no white fish stocks? There is no discussion about the likely cause of the collapse of this important fishery.

5.2.4. It is stated here that ‘Wider seas and biodiversity conservation and/or ecosystem function “**may be vulnerable to fisheries impact**” ‘. There is sufficient research from across the globe, and indeed from Scotland, that shows the seas are vulnerable to fisheries impact and this must be considered in any management plan.

It is a dereliction of responsibility to propose no restorative management measures.

6.2 page 63 High Level Objectives include:

BIOLOGICAL: to conserve, enhance and restore¹ commercial stocks in its inshore and its supporting ecosystem.

ENVIRONMENTAL: to maintain and restore¹ the quality of the inshore marine environment for fisheries and for wildlife.

However, the caveat is stated as: ¹ **CLYDE IFG REQUEST THAT THE USE OF THE TERM “RESTORE” IS REMOVED FROM THE SIFAG HIGH LEVEL OBJECTIVES. FAILING THIS, THE TERM MUST BE QUALIFIED BY SIFAG.**

6.2. Why is the Clyde IFG not able to advance a plan for the restoration of fish stocks? An objective which must be in its longer term interest.

6.3.3. The Clyde IFG proposals seem to be based on only using the Clyde as a *Nephrops* / crustacean / shellfish fishery. There is no mention of the potential for the return of white fish by improved fishery management of the Clyde which would be of far greater benefit to the population and marine communities surrounding the Clyde. It is likely that the public would support plans for such improved fishery management.

No consideration is given to the impact of bottom dredging and trawling on the benthic community and fish nursery areas.

As stated previously, there is no long term vision for Clyde fisheries

New fisheries are mentioned, which could drive further ecosystem decline making matters worse in the longer term

4.1.1. The *Nephrops* trawl fishery is now showing signs of overfishing, as are many of the other fisheries around Scotland, with the exception of the creel fishery.

4.1.2. The Clyde nephrops fishery is currently beyond maximum sustainable yield (MSY). Why has this been allowed to continue? It may well be judged illegal under the United Nations Convention of the Law of the Sea to set limits beyond MSY.

3. How the IFG constitution will be accountable to the public

4.2.3. On page 45 there is a list of ports noted, but the IFG Executive Committee of the Clyde IFG is drawing its membership from a far broader area. Why is this? What have organisations such as Isle of Man Fisherman’s Association, Mallaig and North West Fishermen’s Association, Northern Ireland Fishermen’s Federation, Scallop Association, Scottish White Fish Producers Association Ltd and The Scottish Pelagic Association have to do with the Clyde? Especially since Clyde creelers and sea anglers are not part the Executive. The area of the Clyde has, without consultation, been increased from the agreed Mull of Kintyre to Corsewall Point (see SSMEI report) to include a larger area further south. Why is this?

4.2.3. Sea angling has been ignored. What reason can have influenced this decision? There is no mention of ports which used to be dependent on fishing but because of overfishing can no longer support the industry. Arran is not mentioned and yet marine tourism bodies have a legitimate voice in the public fishery opportunities.

5.1. What is the Clyde IFG's view on the public nature of the right to fish in Scotland?

What is their view on the re-introduction of a 3 mile limit to bottom trawling?

COAST notes that the Arran No Take Zone is not included on the legislation list. Why is that?

What other Clyde fisheries restrictions are in place via restrictions of vessel licences?

7. The management measures proposed seem to apply to everyone but the members of the Executive. What measures proposed actually affect the members of the Executive Committee?

Management measures are set out for statics and unlicensed / casual fishermen.

COAST wishes to know who actually drafted the IFG constitution. What relationship has this constitution to showing public accountability in the proposals for the management of the resource?

In conclusion the main failures of the Clyde IFG Draft Plan are as follows:

- No consideration given to the well established impact of bottom dredging and trawling on the benthic community/fish nursery areas
- No restorative measures considered to any level of ecosystem biodiversity
- No spatial management proposals or zonation proposed
- No consideration of MPAs or Scotland's commitment to the WFD and MSFD. It is not compliant
- No consideration of the impacts of fin and shell fish farm development
- No serious compliance monitoring measures suggested such a GPS tracking for all craft

COAST deplores the two wasted years and money spent on developing this Management Plan that seems to favour the status quo of overfishing without regard for the marine ecosystem. The Plan is without any clear proposals to protect and restore the damaged inshore marine ecosystem and completely disregards those marine stakeholders who are not mobile fishermen. The Cabinet Secretary for Rural Affairs and the Environment has ultimate responsibility for the care of Scotland's inshore waters. His department must demonstrate leadership in rescuing this Clyde IFG Draft Management Plan from its moribund status as a licence to change nothing.

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