

In August the Scottish government published a Consultation on Fisheries Management in Luce Bay Special Area of Conservation(SAC).

See: [www.scotland.gov.uk/Publications/2011/08/12083719/2](http://www.scotland.gov.uk/Publications/2011/08/12083719/2)

It is of great concern to COAST that ecosystem restoration for long term strategic improvement in the seabed appears unimportant in the type of questions asked. COAST's response to the Consultation Questions follows:

## CONSULTATION QUESTIONS

### 5. Main Consultation Questions

**5.1 Based on advice from SNH, the Scottish Government is proposing to prohibit mobile gear fishing in the most sensitive areas in Luce Bay SAC (see Annex B) to protect the features which the site has been designated and to maintain its favourable condition. Do you have any views on this proposal?**

Totally support this proposal. No mobile fishing gear at all. Severe penalties, including loss of licence, if illegally fishing

**5.2 Based on advice from SNH, the Scottish Government is proposing to prohibit or possibly restrict (see 6.1- 6.5 below) mobile gear fishing in the moderately sensitive areas in Luce Bay (see Annex B) and the remainder of the site. Do you have any views on this proposal?**

Prohibit mobiles gear fishing completely for regeneration over time of the sensitive areas. Research is showing this is vital for restorative ecosystem management

### 6. Possible Fisheries Management Measures in Luce Bay moderately sensitive areas.

**6.1 Do you have any views on the implementation of a 6 scallop dredges per side limit as a fisheries management measure in Luce Bay SAC?**

Cease all mobiles including scallop dredging completely and instigate licensed static gear only. 6 scallop dredges per side do as much damage as any number; just do more turnarounds. Ceasing scallop dredging and other bottom trawling mobiles completely is the only good strategic management measure to prevent further deterioration and risk to site integrity.

**6.2 Do you have any views on the implementation of a week-end ban on mobile gear fishing as a fisheries management measure in Luce Bay SAC?**

Preventing overfishing, damage to seabed and benthic ecosystems is vital for the long term management of fisheries. Every vessel of whatever size must be licensed and have a transponder for MS Compliance to monitor. Closing for the weekend is totally inadequate for fisheries management.

**6.3 Do you have any views on a night time curfew on mobile gear fishing as a fisheries management measure in Luce Bay SAC?**

Excellent idea, but how will MS Compliance prevent night time mobiles entering Luce Bay? In Lamlash Bay we have evidenced examples of illegal mobile and creel fishing, often at dusk or later and not one has been prosecuted in 3 years.

**6.4 Do you have any views on a track record based access restriction for mobile gear fishing in Luce Bay?**

This implies continued mobile access and destructive impact within the SAC which we are opposed to. It also assumes it will be possible to assess past track records and monitor future activity, both costly and time consuming processes which will do nothing for the protection of Luce Bay.

**6.5 Are there any views you wish to express or points you wish to make not covered by the questions at 5.1 - 5.2 and 6.1- 6.4 above?**

All research into dredging indicates that the benthic fauna and flora require years for regeneration. If the Scottish Government is to avoid being taken to court under the EC Habitats Directive for failing to meet its international obligations, it has no option but to close Luce Bay to mobile scallop dredging. Closing for the weekend or a few months is a totally inadequate response.