

SSMEI DRAFT FIRTH OF CLYDE MARINE SPATIAL PLAN

RESPONSE BY THE COMMUNITY OF ARRAN SEABED TRUST

26 June 2009

Foreword

COAST is an island community organisation formed to address the degradation of the marine environment and the total collapse of Clyde fish stock. It is comprised of over 1800 members and has a very large number of supporters in the Clyde area. COAST would very much like to welcome this draft plan which we had hoped would help in reversing the over exploitation of a public resource and the poor governmental management of the marine environment over the past 50 years.

COAST has probably more experience than anyone of campaigning, from the community perspective, for an end to the widespread wasteful practices which have characterised man's interaction with Scotland's waters.

We have many reservations. Firstly we ask whether there is really a need such a wide ranging Marine Spatial Plan that encompasses all users, many of which like shipping, ferries harbours etc are already, we feel, managed adequately. It is COAST's belief that we need to look at what has been detrimental to the Clyde, then we need to address these issues. In our, and most scientific, opinion the largest problem in the Clyde is the collapse of fisheries and the un-sustainability of fin fish aquaculture.

In our opinion the Government's remit to the Clyde SSMEI has been far too wide in most areas, but then missed the most important remit "consult with the People & Communities" We feel the Government have wasted many years with this project while the health and biodiversity of the Clyde continues on its rapid decline.

An interesting comparison running alongside the SSMEI project is a project that has been running in South –West England called Finding Sanctuary. <http://www.finding-sanctuary.org/> Again it has been using marine planning but with an emphasis on moving forward to fulfil UK commitments to set up a coherent network of MPA's by 2010-12. It has an excellent website and a steering group with an open invitation for members to join. In contrast the Clyde SSMEI ignored the most legitimate stakeholders the public and coastal communities, Finding Sanctuary has spent a lot of time convening meetings over a much larger area, than the Clyde, consulting with ALL stakeholders. Thereby making the project a much more open and transparent project.

COAST feels that there was a lack of transparency during the 3 years of the Clyde SSMEI.

COAST believe that the Scottish Government has a commitment to promote the recovery of the marine environment as a whole, as enshrined in various international and national agreements, including the Convention on Biological Diversity, the Water Framework Directive, the Marine Strategy Framework Directive and the UK High Level

Marine Objectives document. Some of these, particularly the EU obligations, are legally binding on the Scottish Government, and we are in little doubt that the European Commission will take action against the Scottish Government if it persists in ignoring its wider conservation obligations.

The main concern of COAST is the complete lack of consultation with any person or body based on the Isle of Arran. An Island that geographically and physically dominates the Clyde. The absence of any consultation in the preparation of this draft has not only left the document with many errors but has left it biased toward some members of the SSMEI Clyde pilot steering group. In the introductory letter by the Chair it is stated that "This policy framework is based on the aspirations of Stakeholders and regulators within the Clyde" - not as far as the population of Arran is concerned. In fact, as far as we can ascertain, no community with the exception of fishing communities based around the Clyde have been consulted before the draft was launched. This COAST feels breaks the Aarhus Convention on consulting people and organisations that will be affected by the proposed document.

COAST feel that the decision to use the same group of bodies used by the Clyde Forum to form the steering group, was a major mistake at the very beginning of the project and this is highlighted when you read page 44 of the draft plan. As the organisation which began campaigning for marine protection in Lamlash Bay over 14 years ago we do know the exact facts. When our members read this page they could not believe what they were reading. This was made very clear to me on the evening of the 1st June 2009 in Brodick when Arran was finally given a presentation of the Draft Plan. The project officer told me how the Lamlash Bay No Take Zone came into being; "It was the gift of the retiring secretary for the Clyde Fishermen's Association". Clearly the project officer had believed what he was told by a member of the steering group!

Specific Comments on the Draft:

Page 5. Agree with vision (except it should be 10 not 20 years) but if you don't consult with Communities it is not possible to get a representative vision.

Page 8. Arran geographically dominates the Clyde yet during 4 years of SSMEI project not one person or body based on the island was consulted until the draft was completed. Hardly a model of community consultation.

Page 9. Section 3 incorrect. Complete lack of consultation with important stakeholders.

Section 5 not based on the aspirations of all stakeholders.

Page 11 Section 15 Prawns are the only commercial species left as whitefish stock has completely collapsed.

Page 17 Ecosystem approach

The SSMEI struggles to understand the meaning of an ecosystem approach. Are they happy to exploit the current degraded fishery for prawns or is anyone in power willing to have some ambition to reverse the decline of the past decades? First of all you have to

acknowledge the real current state of the seas; unfortunately it appears to us that the government just produce glossy spin and dreams of what it will be like in 15-20 years. To really make a difference there has to be agreement on working towards rebuilding an ecosystem baseline of at least 20 – 30 years ago and that is not going to happen voluntarily. Only strong government willingness to confront the issues will improve Scotland's natural marine environment and the sustainable use and enjoyment of it for generations to come. Integrating and managing the existing situation is unlikely to deliver any improvement in the Clyde.

Page 19 Section 39 FoCF has learnt nothing if it leaves out important stakeholders.

Page 27 Arran Local Plan not taken into consideration regarding Lamlash Bay.

Page 32 Section 77 Unlikely. COAST view the recently established IFG as being illegally set up, as fishermen are left to manage a common resource. Rather like leaving the fox in charge of the chicken coup.

Page 35. Section 87.08 Disagree. There is currently sufficient knowledge of important habitats and species to make a start to protect it.

Page 37 Section 89 Communities mentioned many times in report but unfortunately they were not consulted with!!

Page 38 Section 92 Fan Mussel?? We doubt this very much.

Page 40 Section 97 Improved information and knowledge about the marine environment will always be needed. However this should not be an excuse for inaction. "More research first" is being used now as in the past to continue with the status quo.

Page 41 Sections 105-107 Missing as indicator species is the most obvious species of -white fish, cod, haddock, whiting etc.

Page 43 Section 111 Skirting around the issue as usual. i.e. Destructive scallop dredging & bottom trawling.

Page 43 Section 112 Natura site. There are no Marine Natura sites in the Clyde. Due to past lobbying from fishing industry! So this section is irrelevant.

Page 44. Voluntary approaches have proven not to work with the fishing industry, as a result of the public right to fish which allows fishermen from far afield to fish in areas where there might be a local voluntary agreement. Consequently, ruining the aims of the initial voluntary agreement.

Page 44 Section 116 COAST strongly object and take exception to the wording of this section. We insist on it being rewritten with our agreement before the next draft in order to avoid a totally false reflection of the situation.

Page 47 Section 132 Again voluntary is unworkable. It is probably too late to save much of the marine biodiversity of the Clyde; voluntary agreements will not save anything.

Page 48 Policy COM 2 Getting local communities to re-engage is not the problem on Arran. It is getting government and reports like this to engage with local communities and to listen and respond, that seems to be beyond them.

Page 50 Section 141-145. Most important. Historical wrecks have unfortunately already been destroyed by scallop dredging and bottom trawling.

Page 56 Section 160. Sea Angling. Just 2 sentences on what used to be, up until 15 years ago, a large and important industry in the Clyde. This is an injustice to sea angling, which provides crucial income to the tourism and recreation sectors.

Page 57. Diagram 17 Public moorings in Brodick, Lamlash and Whiting Bay are all missing.

Page 69. Diagram 20 Timber barge route Brodick to Troon missing. (Lack of consultation on Arran)

Page 71 Timber barge on Arran missing.

Page 76 Section 217 Mariculture

An increase in salmon farming, in the long term, is not feasible to meet increased global consumption. As wild fish stocks decline, where are you going to get fish to make into feed pellets. 5 kilo wild fish to produce 1 kilo carnivorous fish (Salmon)!!

Page 76 Section 218 Mussel farm in Lamlash missing in text but is on diagram 21.

Page 78 Section 223 This is utter rubbish. To state that salmon farming has minimal effects is incorrect as keeping farmed salmon fed is unsustainable and pollution around farms is unacceptable. It is leading to the end of west coast wild salmon and sea trout. SEPA has this week 12th June 09 turned down an application by Lighthouse Caledonia for an increase in biomass at the existing Lamlash fish farm due to poor water quality at present.

Page 79 Section 224 If SSMEI had consulted with the community on Arran instead of an organisation like Lighthouse Caledonia you would have found out that there is no potential for mariculture growth around Arran. This section is completely outrageous for a project that calls itself SSMEI.

Page 79 Section 228. SSMEI need to research this much better. This is nonsense and is contrary to common scientific knowledge.

Page 80 Section 231 This is not our experience on Arran. Multinational fish farms have a poor record of open consultations with community. Arran's experience is that advice from the community was constantly ignored. Indeed advice from SNH regards the Clachlands site was ignored for over 2 years.

Page 82 Section 240 Fishing

COAST agree but not until Government and the Fishing Industry decide to allow regeneration of fish stocks by reducing the impact of fishing methods.

Page 83 Section 243 "perceived" must be deleted. There is plenty of scientific proof regarding damage done by trawling and dredging.

Page 87. Section 252-253 Not true: there is plenty of scientific evidence regarding the damaging impact on the seabed. There is no need to further scientific evidence to prove this.

Page 87 Section 254 Insert “members of the steering group perceive this”: in reality this is just not true.

Page 88 Section 257 Again voluntary closures and restrictions have been proven over time not to work in the fishing industry.

Page 95 Section 276 Disagree. FoCFCG does not contain representatives of all stakeholder bodies within the Clyde.

FoCSCG contains many bodies that are responsible for the dire state of the Clyde.

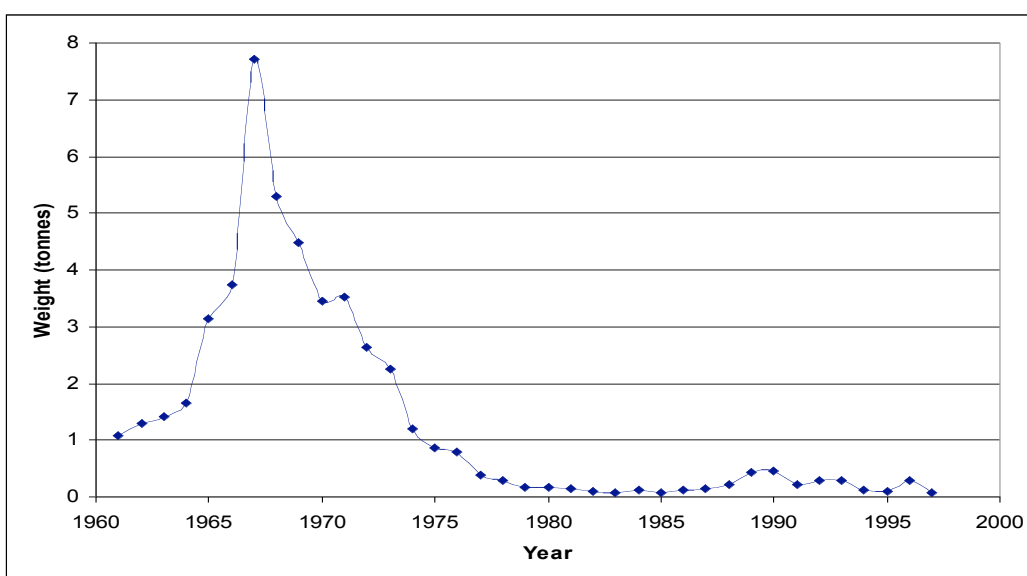
State of the Clyde report.

While this contains a lot of interesting information, the sections of interest to COAST are mainly taken from the Clyde Environment and Fisheries review. Mistakes like: “Carradale fishermen are said to fish round the Arran coast, including in Lamlash Bay, for razor fish.” are perpetuated. There is no commercial fishing for razor fish in Lamlash Bay.

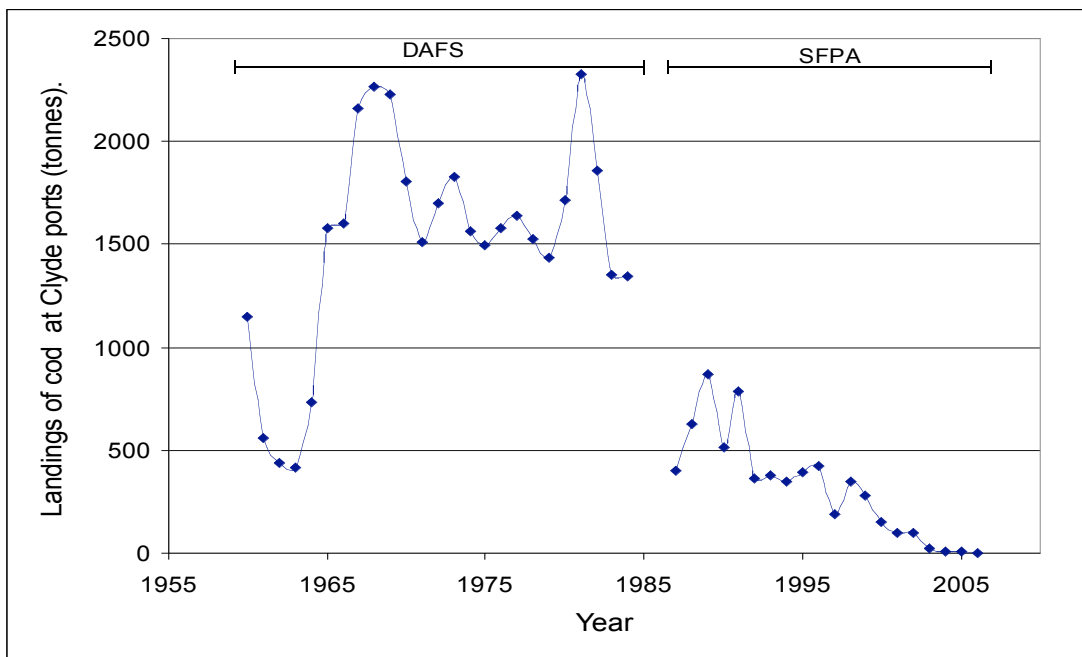
The only graph showing fish numbers on page 60 Figure 37 shows the cumulative number of species recorded in the Clyde Estuary since 1979 and shows a continuous upward trend, no doubt true, but very misleading.

Then it reads “decline in pelagic fish stocks” with lack of up to date data. Nothing else!!! Selection of data to support a false premise.

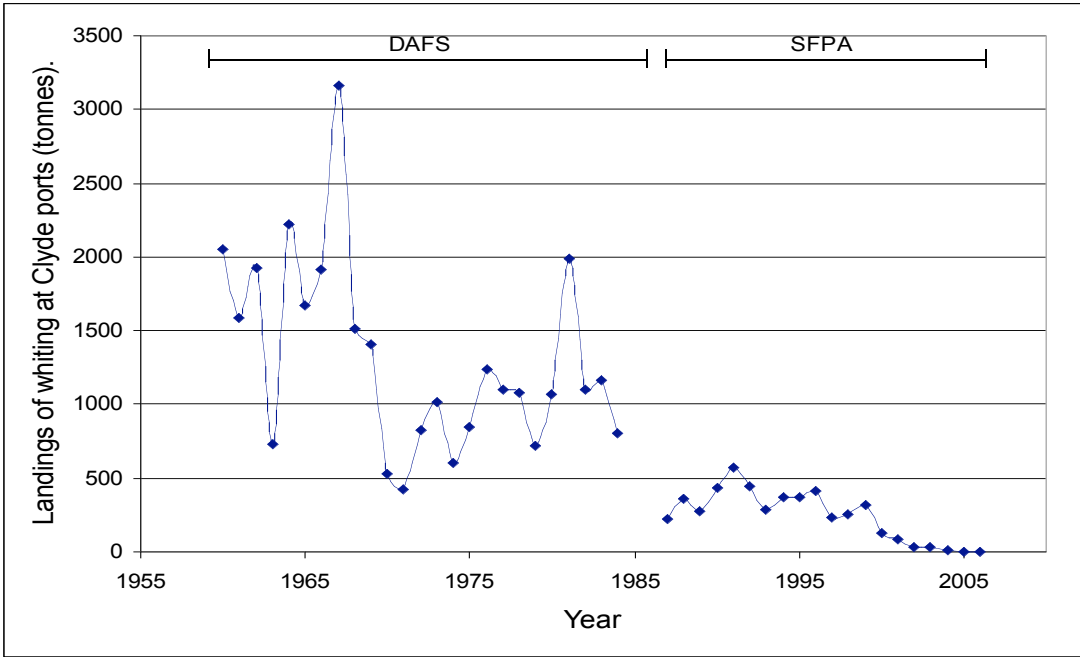
Below is detailed plenty of freely available data up to 2005. Therefore when you add ICES scientific data of no return of pelagic fish stocks due to bycatch of prawn trawling, that will bring it very much more up to date. In December 2008 it is still **ZERO**.



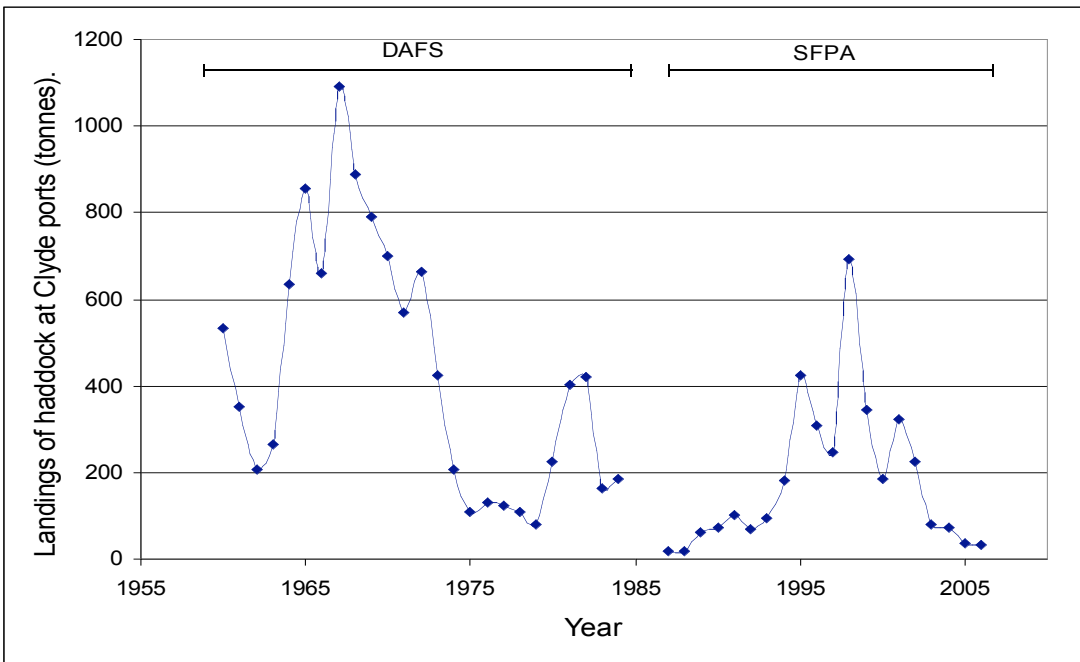
Tonnes of fish landed at the Lamlash Festival. Source: COAST.



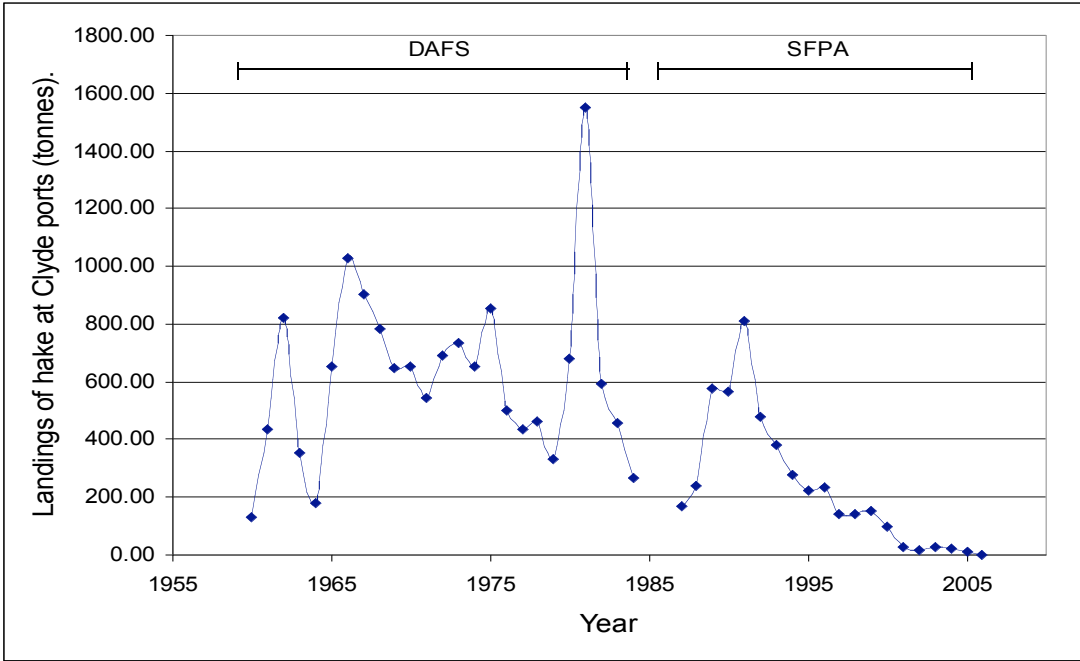
Landings of cod from Firth of Clyde 1960-2006. Source: Department of Agriculture and Fisheries for Scotland (DAFS) and Scottish Fisheries Protection Agency (SFPA).



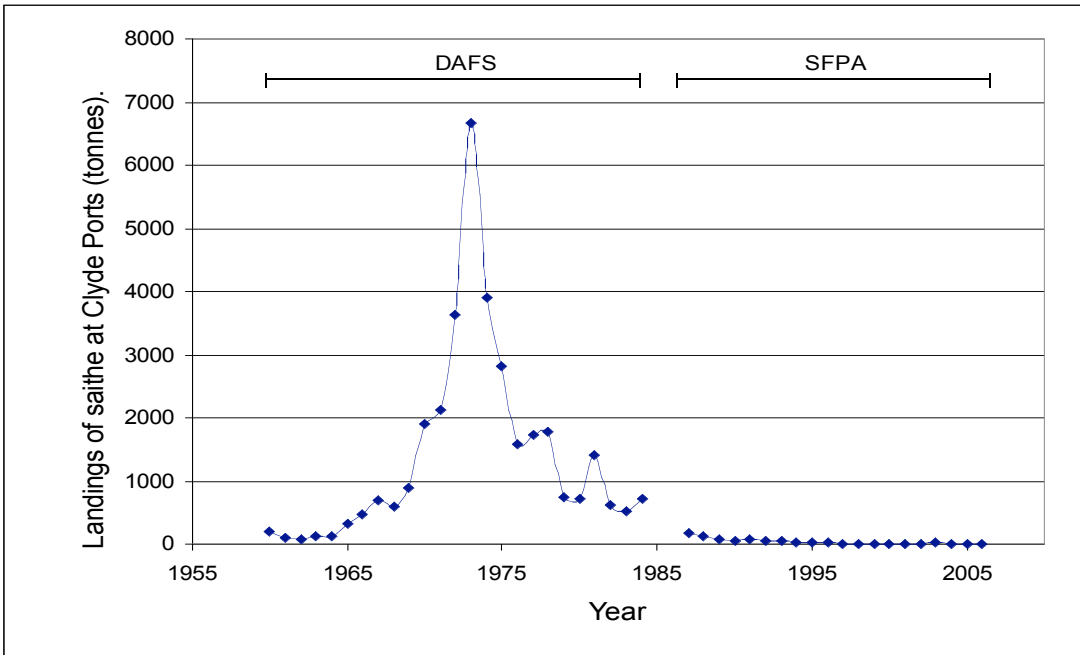
Landings of whiting from Firth of Clyde 1960-2006. Source: DAFS and SFPA.



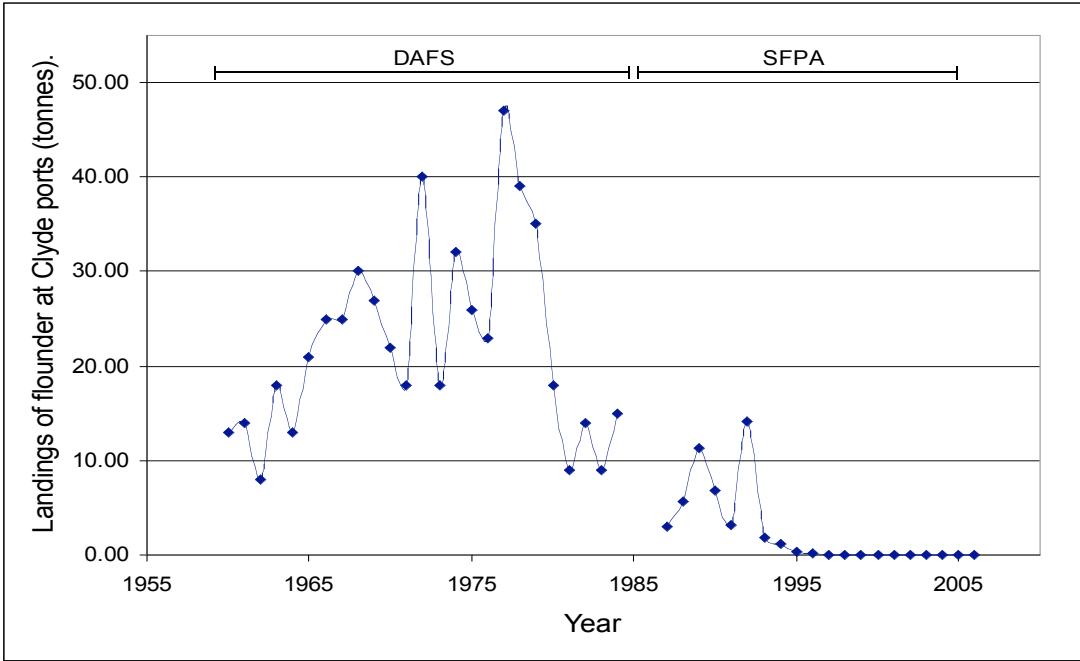
Landings of haddock from Firth of Clyde 1960-2006. Source: DAFS and SFPA.



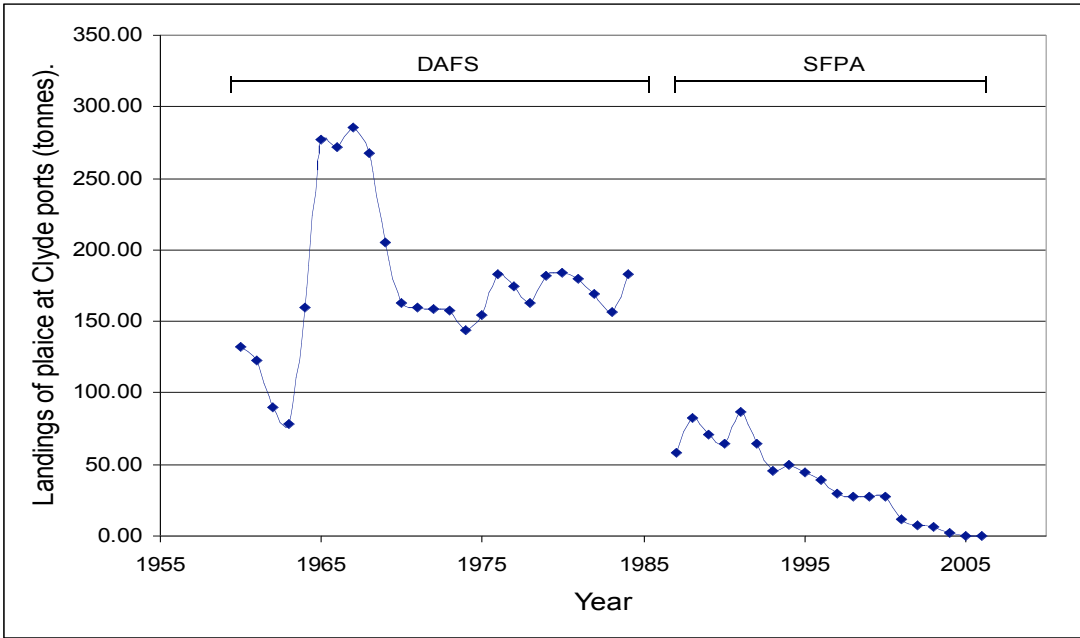
Landings of hake from Firth of Clyde 1960-2006. Source: DAFS and SFPA.



Landings of saithe from Firth of Clyde 1960-2006. Source: DAFS and SFPA.



Landings of flounder from Firth of Clyde 1960-2006. Source: DAFS and SFPA.



Landings of plaice from Firth of Clyde 1960-2006. Source: DAFS and SFPA.

Comment

COAST feels that throughout both documents the true state of the marine environment has been glossed over and the dire state of the resource has not been acknowledged. We feel

that there is a complete lack of ambition throughout the whole document to reverse the devastating decline in both fish stocks and the marine environment over the past 30 years.

COAST feels that the language throughout both documents has been altered due to the main constituents of the SSMEI steering group. For example, the constant use of “Voluntary” in reference to anything needed to be done by the mobile fishing industry. **Whitefish have largely collapsed**. Since there have been zero legal white fish landings by the commercial fleet since 2004, a better phrase would be **totally collapsed**.

The draft document repeatedly states there is either not enough scientific evidence or none at all and therefore we need to commission more research before changing the fishing and aquaculture industries unsustainable ways. This is the usual response from organisations keen to continue with the status quo.

If this was the case, why did ICES scientist recommend to the European commission a total ban on mobile prawn trawling last December?

While COAST appreciate the amount of work that went into producing the draft documents, we feel without major surgery we would not welcome it as a Clyde Marine Spatial Plan with the possibility of it being used after the Marine Bill in more than a voluntary way.

COAST’s overriding comment is that there was a complete lack of consultation with important stakeholders in the Clyde, namely coastal communities.

That:

The principle of People and Community participation in decision making, embodied in the Aarhus convention points clearly to this requirement. We feel these documents failed in this major respect.

Howard Wood

Chairman

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