



## Community of Arran Seabed Trust response to the Consultation on New Controls in the Scottish King Scallop Fishery 2014

### General comments

COAST welcomes Marine Scotland's recognition of the environmental issues facing the scallop dredging industry and the need to bring new regulations into force. We note that the damaging impacts of this industry are recognised as being a threat to the industry itself. We also appreciate the difficulty which Marine Scotland faces in trying to reign-in what is in effect a free-for-all backed up by vested interests and a powerful fishing lobby.

We have included our comments to the consultation questions below but like to make the following general points.

- I. While we welcome attempts to make the industry more sustainable scallop dredging must be recognised as one of the most damaging fishing methods deployed in European waters. In our view it is inherently unsustainable, causing extensive and often irreversible damage to a wide range of habitats for the sake of relatively modest return. Spatial controls are urgently required as well as the proposed effort controls.
- II. Environmental impact assessments should be mandatory for all scallop dredge operators given the risk of damage to the benthos.
- III. The Scallop dredging industry contributes almost nothing in terms of food security and a healthy well-balanced and affordable diet for the Scottish populace. Most of the catch is exported or is too expensive for ordinary families. Further, by damaging breeding and nursery grounds for demersal and pelagic fish species it can be argued that the industry actually has a negative impact on food security. Poor diet and the lack of availability of nutritional and healthy food choices are a key underlying factor in low life expectancy in socially disadvantaged areas of central Scotland. Our inshore waters should be managed in a way that helps to address this issue by encouraging the recovery of white fish stocks.
- IV. The recently published Grid Economics report shows that there would be a net economic benefits to the Scottish economy from closing inshore areas to bottom active gear and that the use of this gear is likely constraining economic development in much of Scotland's coastal waters.

- V. Marine Scotland's approach to this issue is out of sync with public opinion across Scotland and the views of many coastal communities. The public does not want its coastal marine habitats degraded by scallop dredgers.
- VI. The proposed new regulations will still mean that Scotland has one of the weakest regulatory regimes for scallop dredging. Considering Scotland has one of the most extensive and potentially bio diverse coastal seas in Europe this must be regarded as a national embarrassment.
- VII. Countries such as Wales, and many Scandinavian countries all recognise the benefits of stronger effort and spatial controls. Fishing representatives from Scandinavia attending MPA workshops were astonished to learn that we allow dredging in our inshore waters. Scotland should be seeking to follow or set best practice. Instead we are only tinkering with the current regulatory regime.
- VIII. The new regulations will make very little contribution to the achievement of GES under the WFD or the MSFD. Currently nearly all of the coastal water bodies within the Clyde are failing to meet GES due to the damaging impacts of bottom towed gear. This is reflected in the infaunal quality index (IQI) for coastal waters bodies around Arran which are not meeting 'good' status.
- IX. The proposals draw further attention to the Scottish Government's poor management of its inshore waters. As a public resource our waters must be managed for everyone's benefit. This implies that activities that only benefit a few individuals but damage the environment that others depend on should be heavily regulated spatially and in terms of effort. The current proposed changes do very little to address this.
- X. The management of scallop dredging must be within the context of wider ecosystems management. Regulations cannot be simply a way of improving the sustainability of the industry itself. That is not an ecosystems based approach.
- XI. Finally we note that very little consideration has been given to scallop diving and the potential for this more sustainable fishing method to be increased in the <30m zone and to replace dredging activity with a higher value product (as is the situation in Norway). We would also like to point out that despite COAST consistently attempting to engage with the scallop dredging industry and to improve scallop stocks through the creation of the Lamlash No Take Zone, dredgers in the Clyde have failed to engage in the NTZ project. In fact rather than engaging they withdrew from the Lamlash Bay NTZ Implementation Group and have made no positive contribution to management of the area.
- XII. Further The Clyde IFG (now part of the SW IFG) has not been able to provide any leadership on this issue. Communities around Scotland whether fishing communities or otherwise have very little confidence in the IFGs. In our opinion these groups should be disbanded and replaced with partnerships that include all stakeholders including sea anglers, scallop divers and conservation groups.

# Consultation on new controls in the Scottish King Scallop Fishery 2014



## RESPONDENT INFORMATION FORM

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

#### Organisation Name

Community of Arran Seabed Trust

**Title** Mr Please tick as appropriate

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### 3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

**(a)** Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate

Yes  No

**(c)** The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

**(b)** Where confidentiality is not requested, we will make your responses available to the public on the following basis

**Please tick ONE of the following boxes**

Are you content for your **response** to be made available?

**Please tick as appropriate**  
 Yes  No

Yes, make my response, name and address all available

**or**

Yes, make my response available, but not my name and address

**or**

Yes, make my response and name available, but not my address

**(d)** We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**  Yes  No

#### **4.1 Do you support increasing the MLS of scallops?**

COAST supports spatial management measures for dredging activities We would support an increase in the MLS to 110mm within the context of a ban on all scallop dredging within 3nm of the shore. This should be reviewed every two years and local IFGs or partnerships should have the power to increase this limit but not reduce it.

#### **4.2 On what basis should the MLS be increased?**

##### **(a) 105 around the Scottish coast**

IFGs (see comment above) should only be allowed to increase the limit from the national standard. The national standard should not be set to the least ambitious of the IFG areas (Hebrides) as appears to be the case here.

##### **(b) Should be increased in line with IFG requests**

As above IFGs or local planning partnerships should only be able to increase MLS above a new national limit of 110mm

**5.1 Do you support restricting the upsizing of vessels currently involved in the scallop fishery?**

Yes, vessels tonnage and engine sizes should be capped.

**6.1 Do you support the introduction of a single bar length restriction within 12 nautical miles capable of carrying 8 dredges per side?**

No. This proposal is in effect only regulating for the status quo. It highlights Marine Scotland's unwillingness to tackle the damaging effects of scallop dredging in inshore waters. All scallop dredging and other bottom active gear should be banned from inshore waters out to 3nm as is the case in many Scandinavian countries (the activity is often banned out to 6nm in these countries) and in Wales (out to 1nm). Eight dredges per side will mean that Scotland still has one of the most lax regimes in the UK.

Further, dredging in inshore waters is inconsistent with the achievement of GES under both the WFD and MSFD. The waters around Arran for example are already failing to meet GES due to the impact of bottom active gear.

The recent Grid Economics report illustrates that there are considerable economic benefits from instituting a 1nm or 3nm ban on mobile gear within many inshore coastal waters. Further, in the medium to longer term we believe a ban on scallop dredging in inshore waters will bring real environmental benefits to all Scottish coastal communities.

**6.2 Do you support the lifting of dredge number restrictions outside 12 nautical miles?**

No. The focus of any new regulations must be on decreasing the impact of scallop dredging on our marine environment. It is frankly outrageous to consider lifting restrictions on areas outside 12nm to 'compensate' vessel operators. When are scallop dredger owners going to compensate local communities for the massive damage they have done to our marine environment?

**7.1 Do you think that the length of time that scallop vessels spend at sea should be restricted?**

Yes

**7.2 Should any restriction be introduced on the basis of:  
(a) An overnight restriction?**

Overnight and days at sea restrictions should be implemented.

### 7.3 A day at sea regime?

Overnight and days at sea restrictions should be implemented.

Andrew Binnie  
Executive Director  
**Community of Arran Seabed Trust**  
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COAST winner of the 2008 Observer Ethical Conservation Project of the Year