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Submitted to Firth of Clyde cod spawning closure for 2024/25
Submitted on 2023-09-22 15:48:38

Questions

1 Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in 2022 and 2023, to protect spawning cod, for 2024/25?

Yes

2 Please give reasons for your answer to question 1

Please provide your reasons:

The Community of Arran Seabed Trust (COAST) considers that measures are urgently needed to protect and promote recovery of cod stocks. A seasonal closure is a necessary and important measure to protect spawning cod. However, on its own and as it is currently proposed, this is not sufficient to protect and promote recovery of cod stocks in the Clyde. Additional measures urgently need to be implemented, and these need to address the following points:

- Evidence indicates that there are other areas of suitable cod spawning habitat elsewhere in the Clyde, for example further along the Ayrshire coast where there have been reports from fishermen catching spawning females in the past. A precautionary approach requires that all suitable spawning habitat in the Clyde is protected from fishing gears most likely to disturb cod (trawls and dredges).

- The significance of cod bycatch in the Nephrops trawl fishery. The repeated comments in the consultation document about the low amounts of cod caught in the Nephrops trawl fishery misrepresent the significance of cod bycatch in the Clyde. Evidence from research by the University of Stratchclyde in conjunction with Marine Scotland indicates that mortality resulting from the Nephrops fishery is likely to be a significant factor in the lack of recovery of the whitefish stocks, including cod, in the Firth of Clyde. Bycatch occurs throughout the year not just over the spawning period.

The lack of any recovery of the Clyde cod stock clearly indicates that current management approaches are failing. There are clear, additional measures that Scottish Government could and need to pursue to provide much improved opportunities to protect and promote recovery of cod in the Clyde.

3 Do you agree with the continued removal of previous exemptions?

No

4 If no, which exemptions should continue?

Creels, Other exemption (please give details)

5 Please give reasons for your answer to question 4

Please provide your reasons:

Other exemption should be for hand diving for scallops.

COAST supports removal of the exemptions that were applied to the Clyde spawning cod closure up to and including 2021. However, we do not support a blanket ban approach to the removal of the exemptions and do not consider that this is proportionate or evidence-based using on objective assessment of the relative impacts of different fisheries.

Towed bottom fisheries (trawls and dredges) inflict a much higher degree of disturbance than passive and lower impact fisheries on spawning. Many studies have documented the adverse impact of bottom trawling and dredging on seabed habitats and consequently marine ecosystems and, in relation to the Nephrops trawl fishery, there is the notable issue of bycatch as well.

The basis for the removal of exemptions for creeling and scallop diving is not sufficiently robust to be justified.

6 Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

Yes

7 If yes, please give details.

text box:

Research is showing the crucial role of seabed habitat in supporting early life stages of fish such as cod, and that diversity of seabed marine life affects the abundance and growth of juvenile demersal fish. For example, Elliot et. al. 2017 (Juvenile gadoid habitat and ontogentic shift observations using stereo-baited cameras. Marine Ecology Progress Series 568: 123-135), found that an increase in growth of juvenile cod was correlated with an increase in

epibenthic and demersal fauna diversity, indicating that more diverse areas represented high quality habitats for this species in its early life stage.

While the fisheries management measures of the South Arran MPA were not specifically introduced for fisheries purposes, in practice they provide a direct benefit to fisheries by supporting biodiversity recovery and improving the effectiveness of habitats within the MPA to support different life stages of commercially important fish and shellfish. Spatial management measures, with an ecosystem-based approach to protect essential habitats, need to have much greater prominence in the overall approach to fisheries management, including the recovery of Clyde cod.

An appropriate system of monitoring needs to be implemented and sustained in order to measure change in cod stocks and the effectiveness of management measures.

A further comment we wish to make is that we are concerned about information in section 19 of the consultation document concerning C2020 and CMPP. It is not clear what this is trying to say. It is Scottish Government and Marine Directorate that need to provide a lead and momentum for ecosystem-based fisheries management in the Clyde; they need to demonstrate, through their actions, meaningful support for C2020 and CMPP so these initiatives can be effective in their contribution to help deliver an ecosystem-based management approach for the Clyde. To date, such support from Scottish Government and Marine Directorate in this area has been woefully lacking and we are still a long way from an ecosystem-based approach to recover fisheries and the supporting marine ecosystems.

About you

What is your name?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Community of Arran Seabed Trust (COAST)

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

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?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: