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Submitted to Scotland's Future Catching Policy consultation
Submitted on 2022-06-07 15:26:20

Future Catching Policy Questions

1 Do you agree that the current rules around the landing obligation need to be adjusted, taking into account regional and sectoral variances with a focus on the landing of marketable fish and avoidance of unwanted catch (in particular, juvenile fish) through various spatial and technical measures?

No

Please set out the adjustments that you think need to be made.:

It is clear that there need to be improvements to reduce fisheries bycatch. However, the proposals in the consultation document appear to be focussed more on addressing issues for the fishing industry (e.g. reducing the burden of discards on fisheries), rather than fundamentally addressing the sustainability of fisheries.

The existing rules banning discarding are necessary, based on sound reasoning and need to be retained.

The proposals in the consultation document to essentially legalise the throwing away of young, juvenile fish are unbelievably short-sighted and a negligent waste of a public resource. They are also contrary to EU laws designed to prevent overfishing and other impacts.

There needs to be much greater focus and action to reduce fisheries bycatch within Scotland's fisheries. One way to do this within the overall strategy for fisheries is to prioritise and incentivise those fisheries that have far lower bycatch, such as creel fisheries, particularly in areas such as the inshore where bycatch rates of juvenile fish are high. Such an approach could be delivered through spatial management measures that ban bottom-trawling and dredging in inshore waters.

Given the promise of spatial measures within the Future Fisheries Strategy action plan, it is incredibly disappointing to see so little progress on this matter in this supposedly "world leading' Future Catching Policy.

2 Do you agree that the FCP should address issues with unwanted catches of fish and accidental bycatch other species, e.g. cetaceans, seals and seabirds where appropriate?

Yes

Additional comments::

If the Future Catching Policy is to represent "a step change in the way in which unsustainable fishing practices are tackled" it is obvious that it should address (reduce and eliminate) unwanted catches of all target and non-target species. This is required to deliver on other obligations (enshrined in other legislation and policy) on the Scottish Government to manage fisheries using an ecosystem-based approach.

The Future Catching Policy should also address the impact of fisheries on seabed habitats and ecosystem function, but currently it is sadly lacking in these matters.

Fleet Segments: General

3 Do the broad fleet segment categories identified within this section appear correct?

No

If not, please say why::

There are important sectors that are missing: diver collection (e.g. scallops); handlines; electrofishing.

There seems to be no future proofing within the policy for new and novel fisheries that may develop and how these will be dealt with.

4 Are there any specific geographical differences of the sea which you think we should take account of within the FCP?

Yes

If so, please specify::

There needs to be differentiation between inshore and offshore areas. Many inshore areas provide essential spawning and nursery areas for fisheries species and should be subject to necessary management measures to protect, recover and nurture them. Effective spatial management is urgently required for inshore areas to remove heavily impacting bottom fishing gear.

5 Do you think that the proposed actions for each fleet segment sound appropriate?

No

If not, please say why. :

There are no actions addressing the wider ecosystem impacts of the different fleet segments. This is essential if the FCP is to address unsustainable fishing practices.

Consideration of wider-ecosystem impacts and sustainability criteria must underpin the FCP proposals. At the moment this is sorely lacking. Scotland's National Marine Plan promotes an ecosystem-based approach to managing Scotland's seas, putting the health of the marine environment at the heart of marine planning and decision making. This is not the reality of current marine and fisheries management which continues to fail to make progress to address serious environmental problems such as loss of fish stocks and damage to marine habitats and wildlife. The FCP purports to address this requirement but provides no specific proposals or measures to do so.

Limitations on gear, e.g. creel numbers, need to be considered within the context of spatial separation for fishing sectors and an ecosystem-based approach to fisheries management overall.

We are also very concerned about the lack of a proposal for mandatory remote electronic monitoring across all fleets as an integral part of the Future Catching Policy. There is much evidence that demonstrates the effectiveness of remote electronic monitoring (REM) measures to support more sustainable fishing. The consultation fails to explain how the proposed policy measures will deliver the Bute House Agreement commitment to "ensure more effective compliance by extending the requirement for Vessel Tracking and Monitoring Systems across the whole commercial fishing fleet by the end of the current parliamentary session and increasing capacity and capability in marine monitoring and protection." Specific measures to deliver these commitments must be an integral part of the policy, including setting out how robust and tamper proof tracking and monitoring will be delivered.

6 Given the restrictions relating to available marine space and the need to manage displacement issues, do you think a restriction on gear soak time (the length of time static gear can be left in the water to fish) should be set?

Not Answered

If so, for which fleet segments and in what way? :

Fleet Segments: Pots and Creels

7 Do you think there should be restrictions on the number of creels that can be deployed by a fishing vessel?

Not Answered

Additional comments::

8 Do you think creel limits should be set according to geographical area, for example according to regional Inshore Fisheries Group (rIFG) area?

Not Answered

If so, tell us how you think an area should be defined.:

9 Do you think creel limits should be dictated by:

If "another metric", please specify::

Additional comments::

10 Do you think a restriction on string length should be set for the Pots and Creels Segment?

Not Answered

Additional comments::

11 Are there any other additional management measures, such as escape panels soak time restrictions or measures to reduce entanglement of marine species, that we should be considering as part of a package of measures to improve management of the creel sector?

Please let us know below::

Fleet Segments: Gillnets and Longlines

12 Do you agree that we need to develop measures with regards to gillnets and longlines in order to ease the pressure on shared marine space and avoid conflict?

Not Answered

If so, what measures do you propose?:

13 Do you think we should set minimum separation distances between sets of nets or longlines in order to create corridors for mobile vessels to move through?

Not Answered

If so, what should this minimum distance be?:

14 Should we adjust the depth at which gillnets can be set (minimum and maximum) in order to further utilise the marine space and avoid gear conflict?

Not Answered

If so, to what? :

Additional comments::

15a Do you see any need to restrict the numbers of gillnet and longline vessels operating in Scottish waters at any one time?

Not Answered

Additional comments::

15b On the same basis should similar restrictions apply to vessels using mobile gear?

Not Answered

Additional comments::

15c In consideration of questions Q15a and Q15b should these measures apply generically or in a specific geographical area?

Not Answered

Additional comments::

16 Are there additional measures that we should be considering, for example to help prevent entanglements in the gillnet and longline fishery?

Not Answered

If yes, please specify::

Additional Selectivity for Directed Fisheries

17 Of the options provided in this section, which option (or combination of options) do you think should be introduced, and why?

Why?:

18 Do you foresee any unintended consequences of any of the options described within this section, particularly those intended to increase minimum mesh sizes and adjust the Square Mesh Panel requirements?

Not Answered

Specify::

19 Do you consider there should be an exception for low powered vessels working in inshore waters?

Not Answered

Additional comments::

Discard Exemptions

20 Do you foresee any significant issues or unintended consequences of accounting for discards in this way?

Not Answered

Please specify::

Stakeholder Engagement Process

21 Do you agree that this process is the best way to make management decisions in a cooperative manner?

No

If not, what would you propose?:

The full range of relevant marine stakeholders are not included. There are no opportunities for communities or the wider public to have a say in how fisheries (a public resource) are managed. The proposed process is not equitable.

The proposed process does not recognise the differences between inshore and offshore sectors. The proposal for FMAC to have a leading role in the management decision process provides an offshore bias in the decision making.

Current governance structures need significant change if co-management is to be at the heart of decision making. Fisheries need to be managed as the public resource that they are, with a joined-up and properly resourced approach. Decision making processes need to provide a locally focussed delivery structure with a remit and responsibilities that include wider marine environment and biodiversity protection and enhancement as part of a joined-up, ecosystem-based approach.

Improved management decision-making could be achieved via reform of the existing Regional Inshore Fisheries Groups (RIFGs) to cover smaller geographic areas and for the governance structure to involve the full spectrum of relevant stakeholders (including community groups, environmental interests, consumer groups and local authorities).

Greater integration with marine planning on a regional-seas basis would help ensure that high level principles and strategic goals are reflected at an operational level and help deliver requirements in the National Marine Plan. Locally based approaches to fisheries management for the inshore fisheries fleet should be developed and supported through the regional marine plans.

22 Do you foresee any unintended consequences to making decisions this way?

Yes

Please specify::

The exclusion of key marine stakeholders from decision-making will undermine stakeholder relationships and will fail to ensure that the decision-making meets the requirement of wider legal and policy objectives.

Additional Comments

23 Do you have any additional comments to make regarding the Future Catching Policy?

Yes

23:

Scotland's Future Fisheries Management Strategy included a commitment to deliver a robust catching policy which would introduce a range of technical and spatial improvements for fisheries vessels, reduce waste, and encourage compliance with legislation.

The current Future Catching Policy as outlined in the consultation document falls very far short of this. Most seriously it fails to address key issues of unsustainable fishing practices including over-fishing and seabed (and marine ecosystem) impacts and the proposals fail to provide plans to recover the health of our seas and populations of commercially important fish and shellfish.

We are extremely disappointed by the lack of any proposals to further spatial management for fisheries. We consider that this is a major lost opportunity to take steps towards spatial management of fisheries, particular in the inshore area. There is wealth of evidence that identifies the social, economic and environmental benefits that could be realised by removing bottom trawl and dredge fisheries in inshore waters and supporting a transition to lower impact fisheries and the associated recovery and protection of marine habitats and ecosystem function that could be achieved.

While we support the aims of Scottish Government and Marine Scotland to be world-leading, unfortunately the proposals seem to have learnt very little from the past 3+ decades of poor management with a declining fishing industry and jobs. To be world-leading Scotland would benefit by learning from the experiences of other countries that have been far more far sighted in terms of spatial management measures; as one example, Norway, a close neighbour country, where its use of spatial management in inshore waters acts both as nursery grounds and more importantly allows a more balanced ecosystem, benefiting everyone including the economy.

24 Taking in to account the Business Regulatory Impact Assessment (BRIA) supplementing this consultation, do you have any comments or views which you would like to put forward?

Please note this is a draft partial BRIA at this stage. Given the measures aren't set in stone yet, this partial BRIA is setting the foundation for a full assessment which will take form as the measures do. :

About you

What is your name?

Name:
Lucy Kay

What is your email address?

Email:
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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 with 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?:
Very dissatisfied

Please enter comments here.:

Our dissatisfaction lies with the content of the FCP proposals which fall far short of what is required to provide world-leading fisheries catching policy.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:
Neither satisfied nor dissatisfied

Please enter comments here.: