Response ID ANON-26KX-9CEE-H

Submitted to Proposals to close fishing for sandeel in all Scottish waters: consultation
Submitted on 2023-10-13 12:35:09

Questions

1 Do you support the preferred option to close fishing for sandeel throughout all of Scottish waters?

Yes

2 If your answer is "no" or "unsure" to question 1, do you have any views on alternative or complementary measures that could be considered in the longer-term for the protection of sandeel in Scottish waters (please see the SEA Environmental Report for alternatives)?

Comments::

Sandeels are a vital source of food for many key predators in marine food webs, as acknowledged in the consultation. We do not believe any other measure will achieve as positive an outcome for Scotland's marine ecosystems.

3 Is there any further evidence that should be considered in terms of the potential benefits or value of the preferred option that could be considered?

Comment::

Sandeels are at the bottom of many of Scotland's food webs, providing a key source of prey for marine mammals, predatory fish and seabirds, therefore their protection is key for the benefit of the wider marine ecosystem.

Some species of seabirds are known to primarily live on a diet of sandeels, with poor breeding performance of Kittiwakes directly linked to lack of sandeel abundance. By closing fishing for sandeel in all Scottish waters, the opportunity is opened for the abundance of these species to increase – therefore providing a greater abundance of food for seabirds. This would, in turn, decrease the risk the predators face whilst foraging for food as they could do so closer to their nests.

As well as the benefits to seabirds, closure of the sandeel fisheries will benefit other predatory species through increased prey abundance and reduced bycatch of valuable fish stocks such as haddock, whiting and mackerel.

The extraction of sandeels for fishmeal and electricity is highly unsustainable; 238,000 tonnes of sandeel fished in 2020 were mulched for fish meal or burned in industrial burners for generating electricity. By closing the sandeel fishery, this practice would end.

The current practice of sandeel fishing is in direct contradiction to the vision outlined in the Scottish Government's Vision for Sustainable Aquaculture 2023, whereby it is stated that by "using 100% responsibly sourced marine and vegetable ingredients in finfish feeds, identifying opportunities to use a greater quantity of novel ingredients, trimmings and other by-products" aquaculture will contribute to Scotland's zero emission, zero waste and circular economy goals.

4 Is there any further evidence that should be considered to demonstrate any impact on island communities?

Comments::

No.

5 Do you have any comments on the assumptions made in the partial Business and Regulatory Impact Assessments (BRIA) concerning the costs and benefits of the option?

Comments::

Corresponding economic impacts outlined in the BRIA must be assessed against the high environmental benefit closure of the fishery will bring, which is essential to ensure the health of Scotland's marine ecosystem, resilience of our seabirds and achievement of GES for seabirds. Only 1.1% of total catch landed in UK ports is comprised of sandeel, and as no Scottish (or UK) boats fish for this species, there will be no direct impact which makes the proposal economically palatable.

Any environment can benefit from better protection, and every community has the right to a better environment – we believe that all marine decisions should be taken through discussions with coastal communities. Ultimately the success of marine conservation comes from community engagement, strong science and political will.

6 Do you have any comments on the SEA Environmental Report?

Comments::

No.

About you

What is your name?

Name:
Jenny Crockett

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Community of Arran Seabed Trust

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

Publish response only (without name)

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

No

What is your email address?

Email:
email@arrancoast.com

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 satisfied

Please enter comments here.:

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

Please enter comments here.: