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First Minister, Nicola Sturgeon MSP

cc: Roseanna Cunningham MSP, Fergus Ewing MSP, Mairi Gougeon MSP

First Minister of Scotland
Scottish Government,
St Andrew's House,
Edinburgh,
EH1 3DG

17th December 2018

The urgent need to recover our coastal waters

Dear First Minister,

For nearly 100 years our coastal waters were protected from bottom-trawling by the 'Three Mile Limit'. This was set up to protect fisheries such as herring and was a haven for fishing and marine life. Alongside significant commercial fisheries, a vibrant recreational fishery supported a large number of jobs for our coastal communities through boat charter, sea angling and tourism. In 1984, the law prohibiting bottom-trawling inside this coastal limit was repealed, resulting in the destruction of critically important seabed habitats, including fish spawning grounds and nurseries. This has fundamentally changed the ecological health of our seabed. The result has been a collapse in many inshore fisheries, and a loss of vital economic opportunities for coastal communities.

Scallop dredging has developed as an additional mobile fishing sector. In the mid-1970s the introduction of spring-tined Newhaven scallop dredges enabled vessels to dredge rougher and harder ground than before, damaging yet more areas of seabed. Despite these detrimental environmental impacts, scallop dredging has never been properly regulated in our inshore waters, except for a few small closures.

In recent years, in recognition of their ecological importance, 20% of Scottish coastal waters have been designated Marine Protected Areas (MPAs). But for the species and habitats impacted by dredging, this is protection on paper only, with less than 5% of the seabed in Scotland's inshore waters actually protected from destructive scallop dredging and 4% protected from bottom-trawling.

Even these small areas of protection are being flouted. Within the last two months, scallop dredgers have illegally ploughed up areas of seabed at Gairloch and in the Firth of Lorn protected areas, destroying critically important habitats which were showing remarkable signs of recovery.

Marine Scotland, the government body tasked with policing our seas, has been unable to stop this ongoing illegal activity. Were it not for the vigilant efforts of conservation groups, fishermen and committed individuals, illegal fishing inside protected areas would go largely unnoticed and unchecked.

This on-going pattern of damage is unsustainable and contrary to the interests of Scotland. The sea and the fisheries belong to all of us; they are a common resource, and their health are our collective concern. A healthy seabed is the cornerstone of sustainable, profitable inshore fisheries, and underpins the success of many other marine businesses and activities. It strengthens the moral footing of communities of place and promotes a shared awareness of the interconnection between people and the life in our sea. Policies that support the deepening of a community's investment in environmental sustainability promote wider social cohesion. This can and must include reaching out to those whose livelihoods may be impacted in the short-term as a result of any fisheries management reforms implemented for the long term good.

We, the undersigned, call on the Scottish Government to stop illegal fishing in Marine Protected Areas and to take urgent measures to protect our wider coastal waters to allow marine habitats, fish stocks, fisheries and the livelihoods of our coastal communities to recover and develop.

Specifically, we urge that you take the following action:

- The urgent statutory roll-out of robust, tamper-proof and accurate Vessel Monitoring Systems to all scallop dredge and bottom trawl vessels, regardless of size, and underpinned by an effectively resourced and empowered Marine Scotland Compliance unit;
- Reform the spatial management regime for inshore scallop dredging and bottom-trawling to enable broad-scale recovery of marine ecosystems. We urge the Scottish Government to give serious consideration to establishing a Three Mile Limit on bottom-towed fishing methods (on the West coast as priority) and to ensure an independent assessment of the benefits of such a management regime. This higher level assessment should be part of the current Priority Marine Feature review. Fishing activity affected by management reform should be supported during any transition;
- Scottish Government to give preference to non-destructive, sustainable fishing practices when deciding who fishes where. By sustainable we recognise the United Nation’s Brundtland Report definition: that which “meets the needs of the present without compromising the ability of future generations to meet their own needs.”

In addition to these requests we shall be asking for an examination by a parliamentary committee into the capacity of Marine Scotland to deliver the robust oversight needed to ensure our Scottish seas are adequately protected.

Signed,

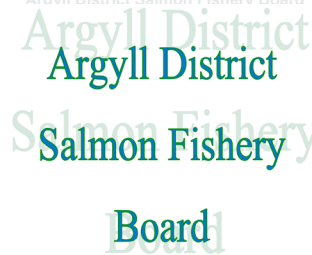
Angling Trust



Ayr Angling Club



Argyll District Salmon Fishery Board



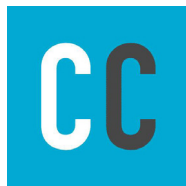
Blue Marine Foundation



Centre for Human Ecology



Coastal Connection



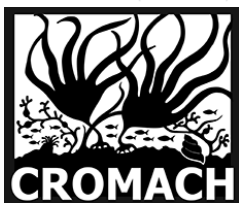
Community Association of Lochs and Sounds (CAOLAS)



Community of Arran Seabed Trust (COAST)



Craignish Restoration of Marine and Coastal Habitat (CROMACH)



Ethical Shellfish Company



Fairlie Coastal Trust



Fauna & Flora International



Fish Legal



Friends of the Sound of Jura



GalGael Trust



Inverness Sub Aqua Club



Knoydart Foundation Ranger Service



Loch Visions



Lochnell Oysters



Mull Charters



National Trust for Scotland



Skye Communities for Natural Heritage



Nourish Scotland



Oban Sea School



Open Seas



Orkney Skate Trust



Project Seagrass



Salmon Aquaculture Reform Network



Save Seil Sound



Scottish Creel Fishermen's Federation



Scottish Federation of Sea Anglers



Scottish Scallop Divers' Association



Scottish Sea Angling Conservation Network



Scottish Sub-Aqua Club



Sea Change



Sea Freedom Kayaks



Sealife Adventruess



Skye and Lochalsh Environment Forum



South Skye Seas initiative



Sustainable Inshore Fisheries Trust



Wester Ross Area Salmon Fishery Board



Scottish Salmon Think Tank

