

SEA CHANGE response to the 2014 consultation on the management of inshore Special Areas of Conservation and Marine Protected Areas.

Sea Change is a local community group based around the shores of the Wester Ross MPA which was set up to demand local management of our inshore waters /Marine Protected Area in order to:

- Demand an immediate ban on Scallop dredging, and reintroduction of a 3 Mile Limit as the simplest spatial measure to deal with the urgent need to protect inshore waters which have been in declining health since the ban was lifted in 1984. MPA proposals are currently inadequate.
- Restore biodiversity of species across the whole ecosystem and increase the numbers of mature breeding adults to promote recovery. Encourage Scientists and Fishermen to share knowledge and work together with the public towards creating a sustainable model of management.
- Support the socio-economic recovery of the area by banning damaging fishing practices that serve a minority and support sustainable fishing vital to our social fabric which generates benefits for a wider majority.
- Retain an independent voice and promote the public as the key stakeholder in our marine environment which has been undermined by regulatory capture by the Scottish Fishermens Federation and vested interests.
- Engage with the community in an inclusive way and promote greater public awareness through factual education, whilst joining with like minded groups along the coast to lobby Government.

SEA CHANGE In July 2014 the group released a public petition to gauge the level of support for a complete ban on dredging within the Wester Ross pMPA on the premise that the practice of dredging was destructive to the sea bed, and the conservation and recovery of marine species and habitats, and brings no benefit to the local community. Two key areas within the MPA ran paper petitions.

Coigach's electoral roll numbers about 200 people and the paper petition was signed by a total of 113 people. 93 were local residents and 19 were supporters from Scotland/UK. This amounts to around half the electoral roll in the area.

Our Ullapool areas' paper petition received 129 signatures of which 109 were local. In addition, an online petition gauging wider support within the area has so far around 1000 signatures. The majority are people from the area but also include visitors, and supporters connected to the area who share our frustration with the dramatic decline of the seas within just a few decades. Many local people observing the fate of commercial species, which once formed a thriving fishing industry, have seen stock after stock collapse.

Support further south along the coastline towards Gairloch and Loch Ewe is estimated to be as high as elsewhere given the number of conservation groups which have expressed dissatisfaction with current proposals. It is our belief that local support for sustainable seas and a change of attitude by the Scottish Government as outlined in this document is very high.

45. Do you support the preferred approach (number 2) for managing the protected area?

No, it needs to take the recent evidence on maerl presence into consideration.

46. If you answered no to Question 43, do you support the other approach?

No, approach 1 is far too minimal.

47. Should static gear fisheries be restricted in the areas essential to the recovery of maerl beds and flame shell beds?

Yes, in certain areas, however we are aware that exploitation of stocks through well-managed static gear fisheries can take place without negative impacts on the seabed.

48. Under either approach should the Summer Isles area be zoned by depth to enable scallop dredging to continue?

No. There should be no zoning by depth. We would like to see an end to all scallop dredging within the MPA.

49. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

No. Please refer to the pointers under the Socio-Economic Section of this response.

General Comments.

ECOLOGICAL & LEGAL OBLIGATIONS

- The Priority Marine Feature system lacks a holistic approach to the ecosystem required under Article 3 of the Common Fisheries policy; these are Marine Protected Areas and so the entire designated area should receive proper protection to ensure ecological recovery of the species and habitats within.
- The current scientific consensus outlined in an article in “Nature” (doi:10.1038/nature13022 **annex 1**) on “Global Conservation Outcomes Depend on Marine Protected Areas with Five Key Features” states the importance of MPAs being well enforced. Small islands of protected species which allow destructive practices to go on around them are difficult and costly to enforce. One violation could destroy maerl which can take up to 10 years to even begin to recover. Recovery of very badly damaged beds could take centuries. An MPA-wide ban on dredging and destructive fishing practices would simplify management and make it more enforceable, practical and offer much better protection.
- The research into MPAs in NATURE show that global conservation targets based on area alone will not optimise protection of marine biodiversity. More emphasis is needed on better MPA design, durable management and compliance to ensure that MPAs achieve their desired conservation value. If the MPAs are ‘paper parks’ or pseudo MPAs that give the illusion of protection, in the complete absence of it - there is a danger of an even greater negative impact.
- ‘New’ areas of maerl have been identified within this MPA area since designation (**see Map 1**), and without protection these maerl beds are very vulnerable to

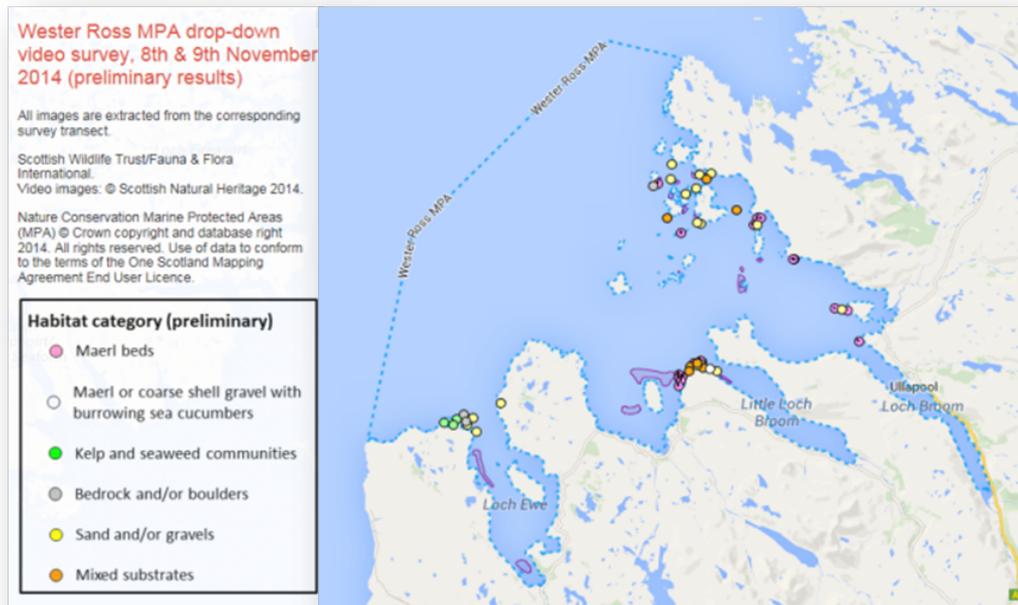
damage. Furthermore, the search for supplementary maerl sites was initiated by members of the community and undertaken after MPA management forums. The adequate surveying and monitoring of MPA sites should be undertaken as part of Marine Scotland's MPA search process.

- Wester Ross is one of the sites within the network with maerl beds. This marine feature has been assigned a conservation objective of 'recover'. Maerl is easily damaged by bottom-towed fishing gear. These beds support many species, including those that are commercially important to the local community, as well as juvenile fish, shellfish and other invertebrates. Flame shells also have a conservation objective to recover and are susceptible to smothering by stirred up sediment. Marine Scotland must now protect these additional areas by following a precautionary approach. Marine Scotland signed up to the precautionary principle and the approach is referred to in the Draft MPA Management Handbook. But it is our opinion that the surveys have not been comprehensive enough, and therefore Marine Scotland must apply the precautionary principle as part of a science-based management approach to un-surveyed areas with little research data. This is a legal requirement under Article 3 of the Common Fisheries Policy.
- MPA designations are driven by European obligations for Good Environmental Status through the Marine Strategy Framework Directive. Yet a meaningful, site specific and bottom-up approach is being neglected in place of a minimal 'tick-box' exercise.
- The Marine Strategy Framework Directive (amongst other international legislation) demands "Good environmental status by 2020" and "coherent and representative networks" of marine protected areas. The current proposals fall short of "coherent" and "representative". The MPA highlights just a few species for special protection in isolated islands. This is not good science and does not recognise the interconnections of species within an ecosystem.
- The exclusion of larger sea mammals and commercial species, amongst others, from the objectives mean the MPAs are not "representative."
- Stock after stock has collapsed since the 3 mile limit was lifted. (**annex 2** Thurstan and Roberts 2010) Added to that are the pressures to salmon and sea trout from farming. Recovery of fin fish species and their spawning/nursery grounds should be a top priority for an MPA - particularly herring, one of the keystone species of the area, a species whose life cycle is connected to that of maerl.
- Vulnerable seagrass beds such as in Gruinard Bay have not been included in the list of protected features. Seagrass (eel grass) beds should be included for ecological coherence of the MPA and the potential benefits for other species.

MPA management needs to account for shifting baselines – i.e what is considered 'normal' now is an environment that has been in decline for decades as outlined in Scotland's Marine Atlas. Divers who have operated within this area for years observe that maerl beds were once much more extensive. Maerl enhances the fertility of the whole ecosystem so protecting it across the whole of the MPA would help recovery from the depleted seas outlined above.

- Sea Change would like the MPA process to deliver tangible benefits to coastal communities to justify the lengthy process and the huge cost to the public purse. We would like it to fulfill the legal obligations above.

- New evidence proving extensive maerl sites: map 1



Map 1 above shows ‘new’ areas of Maerl found by camera drops carried out by SNH, supported by SWT and FFI, on 8th-9th November 2014, against the maerl beds previously mapped.

- Local knowledge initiated recent survey efforts to map previously unrecorded maerl within the MPA. These new areas, and the distinct possibility that other important features will be identified in the future, should be taken into consideration when looking at the proposed management approach for the site. With the precautionary principle in mind it is noted that trawlers frequently tow their gear close to the newly mapped maerl area i.e. the section of coast between Coigach and Isle Martin. This area is also important as a historic nursery ground, a herring spawning area, and an area where dolphin and porpoise are frequently spotted by tour boats.
- More survey work must be carried out to establish the full extent of important features within this MPA area, and local knowledge must be taken into account. Maerl is a very slow growing species so it is vital to monitor closely.

SOCIAL-ECONOMIC IMPACT

- Dredging offers no socio-economic benefits to the Wester Ross community: no local jobs are at stake if dredgers are banned. Dredging has a negative impact on creelers and divers and other stakeholders who are the vast majority. Many of the jobs on dredgers are foreign nationals [with conditions on board ethically questionable].
- The local economy is dependent on tourism and fishing and would be positively enhanced by the banning of dredgers. Small scale sustainable methods such as creeling and diving offer far more socio-economic (and environmental and cultural)

benefits. Fishing is key to the social fabric of our communities, in the community of Achiltibuie alone there are 10 households that creel or hand-dive for a living.

- After dredging, many undersize scallops which are damaged are subsequently killed by starfish. It is our view that the value of shellfish fisheries within shallow sheltered waters **will increase** if scallop dredgers are kept out. Consumers tend to pay more for sustainably caught, live produce as reflected in higher prices. There is growth potential in this market for local people. Scallop dredging makes no economic sense to vulnerable coastal communities that should be seeking the highest price possible for the few marine resources we have left.
- Banning dredgers would reduce gear conflict as an additional cost to creelers. Equally, damage done by dredgers to the scallop beds forced one local scallop diver to travel a long way outside of the area to continue business, whilst previously it was possible to sustain a living within the area.
- There will be positive impacts for juvenile cod, flatfish, skates and rays, lobsters and crabs, and many other species including sea trout as the habitat recovers in the absence of mobile gear.
- Other recreational activities may also increase as seas recover and the expansion of the marine recreational sector could thus create large numbers of jobs in these areas to compensate for losses elsewhere. Tourists are attracted by recreational diving, bird watching and observing sea mammals. The area formerly attracted many sea anglers, which has rapidly declined with the loss of species to catch. The availability of fresh sustainably caught seafood is a tourist attraction but supply has also fallen within a few decades. A proper and balanced assessment is urgently needed.

We believe the assessment of costs and benefits presented within the consultation document by Marine Scotland is biased towards the mobile fleet. No attempt has been made to quantify the potential economic and social benefits of restricting access to mobile fishing gear to our local creelers and scallop divers and other local fisheries, who are larger in number. This is a misleading document which appears to have been drafted by representatives of the mobile fishing gear industry.

- SFF purport to represent fishermen from this area when protesting against prospective closures to small areas. SFF must demonstrate how many, if any, local fishermen they represent. Over the years creelers and scallop divers voices have been suppressed, often in an atmosphere of intimidation or threats to gear. This is unacceptable in a modern democracy.

‘SEA CHANGE’ believe the MPA should offer adequate and robust management of trawling practices, including a ban on all nomadic trawling vessels. [Ideally we would like to see a phased out decommissioning of all local trawler vessels in a fair compensation scheme.] Local boats which are established and operating in the area should be offered support from Marine Scotland to help mitigate the financial impact of strict management.

NEGLECTED SPECIES AND HABITATS:

Seabird populations (including common and arctic terns, shags, fulmars, eiders, herons and common gulls) saw significant declines from 1981 to 1990 as a result of the loss of sand eels caused by commercial fisheries, and pollution. Despite reduction of pollution and direct persecution, these populations have not rebounded,

which is thought to be attributable to the destruction of marine ecosystems due to over-fishing and dredging.

As global ecosystems contract and decline in the face of increased human pressure, our local colonies – including the Storm Petrel colony on Priest Island, thought to be the largest in Scotland and with the highest European designation (SPA) - are therefore becoming more and more scientifically important.

- Sea trout are coastal explorers, and their numbers, along with wild salmon, have fallen markedly over the past few decades due to a number of factors. An improved habitat with less disturbance could increase their chances of recovery.
- This MPA is important as a burrowed mud habitat. The most economically important form of fishing for the local fishermen who operate within this MPA area is nephrops (prawn) creeling. Nephrops are reliant on a healthy burrowed mud environment, therefore this habitat should be protected as much as is possible within this area.
- Sea angling and angling competitions used to be a common occurrence within this area with the expectation of catching mature fully grown fish very high. Quoting from **“Sea Fishing In Scotland”** which describes the European Scottish Sea Angling Championships, held in Ullapool in 1965 it says *“ a fleet amassed to take afloat the 200 expert International Anglers who descended upon Ullapool, out to the famous Summer Isles grounds. It was very much a “Dunkirk” armada The fish returns were most encouraging. 10,750 lb of fish including skate to 160 lb.* These catches are no longer possible due to the dramatic decline of fin fish species. These are important cultural events and a recovery objective is essential. (Sea Fishing In Scotland - Robinson, Laurie 1970 - Adam & Charles Black, London. 182pp. ISBN 0 7136 1073 5 - **annex 3**)

A POSSIBLE SOLUTION & ALTERNATIVE MODEL?

The return of the 3 mile limit offer's the most immediate way to protect inshore waters urgently, however SEA CHANGE recognises other models can achieve the objectives of enhanced local fisheries and conservation and recovery too.

Sea change believes the Wester Ross MPA provides a unique opportunity to create a world class model of sustainable local management and reverse years of decline. The hope is to build relationships between fishermen and scientists, environment groups and representatives of the public to create a model of best practice which fits local needs - thus pioneering a modern approach which includes the ongoing education of the public. This encourages fishermen and scientists to work together with increased understanding in order to achieve common goals. This is inspired by the example of COAST & South Arran MPA's lead.

The exact model would require far greater local consultation with support from Marine Scotland but it would hope to find unique solutions that would enable recovery of the marine environment for future generations and be an asset to the whole of Scotland.

We recognise that this option will have short and mid-term impact for a small number of fishing boats that currently fish the area. This may require conflict resolution support to negotiate a fair and respectful deal with the mobile fleet. We think it is important that Marine Scotland support affected fishermen during the transition in

management. It is anticipated that a closure to bottom-towed fishing gear in this area will improve the wider ecological health of our seas and provide long-term, beyond-the-site benefits for commercial fishermen and others which will fully outweigh the costs.

The Marine (Scotland) Act 2010 already gives Scottish Ministers the power to introduce a permit system to regulate fishing within an MPA. This has recently been used to implement a Marine Conservation Order for the South Arran MPA - we call for similar measures in Wester Ross MPA.

The public has been disenfranchised for decades by the way in which the mobile sector has been given the status of key stakeholder. Current models of MPA's seem designed to maintain the status quo rather than to give better value to society as a whole and restore the ecosystem and collapsed stocks. Fish stocks in Scottish waters are a national resource and should be managed on behalf of all.