

14<sup>th</sup> November 2019

To whom it may concern,

**The Coastal Communities Network “Seabed Reform” sub-group statement on illegal scallop dredging in MPAs.**

The [Coastal Communities Network](#) (CCN) is a collaboration of locally-focused community groups, guided by the belief that coastal communities across Scotland are well placed to harness long-term solutions to ensure healthy, thriving and well-managed seas. CCN facilitates a [Seabed Reform](#) sub-group of Network members, who are actively involved in the #OurSeas coalition across Scotland. #OurSeas currently consists of 45 organisations who have submitted a collective statement to the First Minister calling on the Scottish Government to take urgent action to reform Scottish inshore fisheries management measures.

With reported illegal infringements into Scotland’s [MPAs numbering into the hundreds](#), and mounting evidence of continued [illegal dredge damage](#), e.g. on the seabed in [the Firth of Lorn SAC](#) and the [Wester Ross MPA](#) in June and July this year, there is an urgent need to take action to recover Scotland’s degrading seabed. This is not only to recover Scotland’s natural biodiversity but also to ensure a just transition to a more sustainable management of Scottish fisheries, in order to safeguard the long-term health and vitality of both our seas and coastal communities.

Further to the ongoing work of [#OurSeas](#), the CCN Seabed Reform sub-group would like to emphasise here the perspective of concerned coastal communities and to demonstrate solidarity across local communities on this issue - who are continually impacted by illegal fishing activity within Scotland’s MPAs. Of course, there is a diversity of perspectives and interests across all coastal communities, however coastal communities are becoming increasingly aware of, and frustrated by, the environmental damage that can be inflicted by unregulated fishing activity.

This critical degradation and loss of biodiversity will not only affect the continued health and vitality of Scotland’s ecosystems and natural resources, it will also have wide-spread and severe socio-economic implications. The damage done to MPAs directly impacts our livelihoods, which includes commercial and recreational fishing. Many residents of coastal communities around Scotland also operate tourist businesses that depend on a thriving marine environment, and reducing biodiversity reduces the experience and enjoyment of tourist groups.

As local custodians and stakeholders, we have worked hard and tirelessly to campaign for a ban against scallop dredging in MPAs, as bottom-contacting fishing gear such as trawling and dredging can drastically set back the recovery of the seabed and fish stocks within an MPA, which in turn jeopardises the income of countless coastal communities.

We know only too little about what is in our seas, yet responses to our previous letters suggest that protecting our endangered seas remains a low priority for the Scottish Government. We therefore implore Scottish Ministers to take the appropriate measures to ensure the continued health of our seas by adopting the Precautionary Principle, e.g. when drafting Marine Conservation Orders – particularly in areas with Priority Marine Features (PMFs) and other protected species.

If Marine Scotland Compliance cannot ensure comprehensive patrolling of Scotland’s coastal waters, coastal communities will be forced to take action to safe-guard our local economies and the recovery

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of our coastal seas, which we have fought hard to achieve. While we are happy to support Marine Scotland Compliance, the Scottish Government cannot rely upon public volunteers to police Scotland's MPAs. Out of necessity, we are already working hard to:

- 1) launch our own surveys to map and monitor biodiversity in order to protect it,
- 2) set up neighbourhood watch schemes to police our seas, e.g. by using [K.I.P.P.E.R. guides](#),
- 3) collect evidence of illegal dredge incidents and other damage,
- 4) build awareness and campaign for change, and
- 5) protect our local fisheries, sea angling and tourism economies from the 'theft' of illegal fishing.

Our seas are part of the commons, and as such they belong to all members of society. Preserving the vitality and productivity of Scotland's seas is thus a public interest and a moral obligation towards future generations. As Aldo Leopold famously declared: "A thing is right when it tends to preserve the integrity, stability and beauty of the biotic community. It is wrong when it tends otherwise".

Sincerely,

Sara Nason

On behalf of the CCN Seabed Reform sub-group:

**Community Association of Lochs and Sounds (CAOLAS)**

**Community of Arran Seabed Trust (COAST)**

**Craignish Restoration of Marine and Coastal Habitat (CROMACH)**

**Eigg Environmental Action Group**

**Fairlie Coastal Trust**

**Friends of the Sound of Jura**

**Knoydart Foundation Ranger Service**

**Orkney Skate Trust**

**Save Seil Sound**

**Sea Change, Wester Ross**

**Skye Communities for Natural Heritage**

**South Skye Seas initiative**

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