

Alasdair Firth
Chair, CAOLAS
Cobblers Cottage
Driminin
Morvern
By Oban
Argyll
PA80 5XZ

Gillian Martin MSP
Convenor
Environment Climate Change and Land Reform Committee
Scottish Parliament

cc: John Scott MSP

18th December 2018

The urgent need to recover our coastal waters

Dear Convener,

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 created an coastal fringe of largely undisturbed marine life. In 1984, the law prohibiting bottom-trawling inside this coastal limit was repealed, resulting in the destruction of critically important seabed habitats, including fish spawning grounds and nurseries.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 a significant fishing sector since WW2, and in the mid-1970s the introduction of spring-tined Newhaven scallop dredges enabled vessels to dredge even more of our seabed. Despite its detrimental environmental impact, scallop dredging has never been properly regulated in our inshore waters, and is allowed in all but a few small closures. This contrasts with the approach taken elsewhere in the UK, where it is banned within 1nm from shore in Wales, within 3nm from shore in Sussex and the North-east of England, and internationally, in countries such as Norway, where hand-diving only is allowed.

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.

Regrettably, over the past year we have become increasingly aware that even these small areas are being flouted. Within the last two months, evidence has emerged of scallop dredge damage inside the Gairloch protected area (the only known herring spawning ground on the west of Scotland) and in the Firth of Lorn protected area. Evidence of such illegal activity was also uncovered in the Firth of Lorn in January this year. Reports indicate that illegal dredging there may have occurred during each of the past three winters. In answer to Parliamentary written questions, Government disclosed that they have been made aware of 11 reports of suspected illegal scallop dredging in the past year alone.

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 fishermen, committed individuals and communities and conservation groups, illegal fishing inside protected areas would go largely unnoticed and unchecked. It is clear that even with this support that Marine Scotland have been unable to stop persistent offenders, with warning letters and unsubstantial spot fines.

We the undersigned are therefore writing to request that the Committee considers examination of the capacity of Marine Scotland to deliver the robust oversight needed to ensure our Scottish seas are adequately protected.

We will gladly discuss this, our concerns, and suggestions for action with you in more detail.

Alasdair Firth

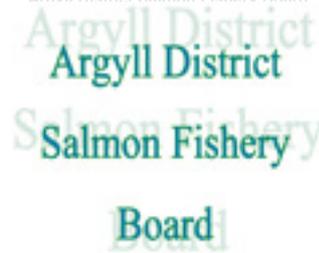
Chair, Community Association of Lochs and Sounds (CAOLAS)

on behalf of the following signatories:

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 Adventrures



Skye and Lochalsh Environment Forum



South Skye Seas Initiative



Sustainable Inshore Fisheries Trust



Wester Ross Area Salmon Fishery Board



Scottish Salmon Think Tank

