

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

22nd August 2019

The urgent need to recover of our coastal waters

Dear First Minister,

On the 17th December 2018 and the 27th February 2019 we wrote to you asking you to take urgent action to tackle the problem of illegal fishing in Scotland's Marine Protected Areas, and improve inshore fisheries management to limit the impact of damaging fisheries.

As we stated in our letter on 27th February, we were disappointed not to receive a response from yourself or one of your Ministers, and were further disappointed that the same was true of our second letter.

Sadly, this disappointment has now turned to frustration, with evidence of yet more illegal dredge damage being observed on the seafloor in the Firth of Lorn SAC and the Wester Ross MPA in June and July this year. The Scottish Government has sadly failed to deter this illegality since the inception of the MPAs and we are now questioning Ministers' ability to deliver legal commitments under the Marine (Scotland) Act 2010, including duties to protect MPAs and their designated features.

We welcome the response we received from Mr Brownlie, received 18 March 2019, offering to provide a 'compliance seminar', and those undersigned who are able to attend will engage positively in the meeting now scheduled for late August. We warmly invite your Ministers to attend this seminar to help share first-hand the issues being faced by our coastal communities, businesses and commercial fishermen.

We also welcome Mr Watson's email, of 21 January 2019, restating Mr Ewing's October 2018 commitment to deliver vessel tracking - something also required under your Manifesto commitment to deliver in the 2015 Inshore Fisheries Strategy, and by the Scottish Parliament's motion of 11 December 2018.

However, it is nearly a year since Mr Ewing's announced £1.5m funding, and there has been no sign of progress. We are therefore deeply concerned that it has slipped as a Scottish Government priority. Moreover, as stated in Mr Brownlie's letter of 18 March, "location and speed as taken from [tracking devices] do not prove what the vessel has been doing", there is a need to ensure that the tracking deployed is delivered in a robust and meaningful way and rolled out across the whole fleet. As commercial fishermen, coastal communities, businesses and organisations working around our shores, we have views on this and would again welcome a meeting with yourself or one of your Ministers to discuss this issue.

Finally, the secondary point raised in our previous correspondence, regarding the need to better manage the way inshore fisheries operate in coastal seas, remains unaddressed. The Scottish Government has committed to a review of the damaging impacts of bottom-trawling and scallop dredging on seabed habitats across Scotland's inshore waters – the Priority Marine Feature (PMF) Review. However, we note it has been over a year since Ms Gougeon wrote to the Scottish Parliament (ECCLR Committee) stating that "new management measures [associated with the PMF review] will be subject of public consultation around the end of 2018... and implementation of any measures is planned to take place during 2019". The first of these deadlines has now been missed, and it appears unlikely that the second will be delivered in the next four months.

We note that Marine Scotland have recently reported on 2018's 'Scoping' Consultation for the PMF review and welcome the Scottish Government's willingness to now consider whether a coastal limit on these damaging fisheries is an appropriate way to protect the marine environment. However, important seabed habitats and species are still being ignored in this process, and we remain concerned that the preferred approach - protecting just a few, limited "specific zones" - will be insufficient to recover the true potential of Scotland's seas.

We remain advocates of a low impact zone extending to three miles from shore, akin to the 'Three Mile Limit' which was in place until 1984, and are surprised and dismayed that this has been ruled out from being a potential approach on the grounds that it would be a "step change in fisheries management". We need a step change in fisheries management, and there is strong evidence to support one on ecological and economic grounds.

In your recent TED talk you spoke eloquently of the pitfalls of GDP, a measurement which “values activity in the short term that boosts the economy even if that activity is hugely damaging to the sustainability of our planet in the longer term”. Damaging fisheries may yield short-term profits, but they undermine the value of Scotland’s natural wealth.

The signatories to this letter, which includes a still-growing list of organisations, stand united in their support for urgent action, such that our marine environment can recover and inshore fisheries flourish once more for the long-term benefit of Scotland and its people. We look forward to your response.

Signed by,



Angling Trust



Argyll District Salmon Fishery Board



Ayr Angling Club



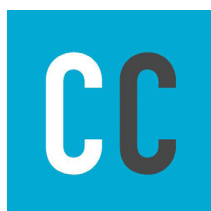
Blue Marine Foundation



Blue Planet Society



Centre for Human Ecology



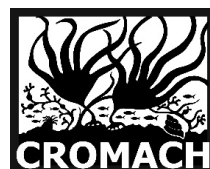
Coastal Connection



Community Association of Lochs and Sounds (CAOLAS)



Community of Arran Seabed Trust (COAST)



Craignish Restoration of Marine and Coastal Habitat (CROMACH)



Eigg Environmental Action Group



Ethical Shellfish Company



Fairlie Coastal Trust



Fauna & Flora International



58°North Scottish Seaweed



Fish Legal



Friends of the Sound of Jura



GalGael Trust



Knoydart Foundation Ranger Service



Loch Visions



Lochneil Oysters



Mull Charters



National Trust for Scotland



Nourish Scotland



Oban Sea School



Ockran Oysters



Open Seas



Orkney Skate Trust



Project Seagrass



Salmon Aquaculture Reform Network Scotland



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 Adventures



Skye and Lochalsh
Environment Forum



Skye Communities
for Natural Heritage



South Skye Seas
initiative



SubSeaTV



Sustainable Inshore
Fisheries Trust



WRASFB - Wester
Ross Area Salmon
Fishery Board