

CONSULTATION QUESTIONS

1. Do you support the development of an MPA network in Scotland's Seas?

Yes No

It is almost impossible **presently** to answer this question, where responding on behalf of such a wide ranging section of the inshore fleet.

The NW IFG members range from small creel vessels of approximately 20ft to mobile gear vessels three times that size. Further nomadic vessels occasionally either landing or fishing in the NW IFG area can escalate that range to the largest white fish or purse seine vessel.

At MPA consultation meetings, and from reaction at IFG meetings and talking informally to fishermen, it would appear that fishermen are as polarised in their view against, as those of an environmental interest are for, the proposed Marine Protected Areas.

Generally the view of fishermen in regard to MPAs is negative whether talking to mobile or static gear operators.

The view of mobile operators toward any expansion of presently protected areas (SACs, SPAs and SSSIs) would be considered as seriously detrimental to their fishing opportunity.

In these waters many fishermen often express the view that the very fact marine biologists and scientists, who contribute to the MPA initiative, cannot claim on the one hand to have discovered an abundance of previously unknown species within these waters, but on the other hand claim that without protective barriers placed around significant areas of seabed, drastic destruction of these species and their habitat is imminent.

One fisherman summed it up in this way. "There is far more seabed I cannot fish on, than the ground I can"

In the static gear sector of the NW IFG, the view of the majority tends to be that if the three mile limit were restored there would be no need for MPAs since a large part of the inshore would be protected. They believe that creel fisheries cause insignificant seabed damage so any MPA restriction within that zone would be pointless.

However an added problem within that protected system was that static gear fishing took place in some areas outwith the three mile zone, and this caused conflict with mobile operators who were denied access to the inner areas.

One solution the NWIFG suggests should be progressed, over a two or possibly three year period, is a scientifically-based recording system by which the inshore fishing industry can demonstrate sustainable targeting of fish and shellfish stocks. By that means a proper examination of the proposals could be evaluated.

From an Inshore Fisheries perspective, the MPA process may, although hardly welcome in its present form, at least encourage moves throughout industry to consider setting up management systems which could produce substantive evidence to challenge the assessments of other groups claiming an interest in the inshore marine environment.

Individual possible Nature Conservation MPAs

The NW IFG will restrict comment meantime to those pMPA which lie within its area but comment is in the main centred on the Northwest Sea Lochs and Summer Isles pMPA which is the largest proposed throughout the NW IFG.

pMPA Public meetings in Ullapool were lively and from comment in other areas better attended than many.

There was a strong exchange of discussion between MS, SNH, and JNCC personnel and fishermen (Both Mobile and Static gear operators)

There was, it has to be said, serious concern raised by both fishing sectors that fishermen's right to fish was being further eroded. Protection of species and habitats, it was suggested, were more important than fisherman, their livelihood and the families they support.

Similar concern is raised in regard to the MPA proposals for Loch Alsh, Duich and Long, The Small Isles, and areas around Loch Sunart and the Sound of Mull.

The general feeling was that, once again, other agencies of whatever persuasion are "ganging up" on the fishing industry.

The message from SNH and JNCC that the pMPAs would, in the longer term through protection of seabed habitat, enhance fisheries as they would give protection to juvenile fish and shellfish, is reluctantly given some credence.

To remain viable under pressure of shrinking stock quotas, reduced days at sea and presently a downturn in demand from traditional continental markets, in the main fails to convince fishermen of the possible future value from this initiative.

Fishermen will point to the other pressures which affect them and these continue to grow. e.g. Fish farming (both finfish and shellfish), and the use of medicines in finfish aquaculture is a serious concern.

There are "new" pressures arising, for example the gradual escalation in marine energy production, and from the effect of cables from installations to land based substations.

It is the view of the NW IFG that proposed Marine Protected Area designations are being forced ahead too quickly from a fishing industry perspective.

While it is evident that environmental bodies have received long term

government funding to evaluate their work, little support has been given to research based on fishermen's knowledge or interest.

It is a cause of some alarm then that when Scottish Government has seen fit to encourage fresh thinking on management practice in the inshore fisheries **by** fishermen, that hardly have these Inshore Fisheries Groups had time to publish their proposed management plans, far less bring them into practice, than they are now faced with a plethora of areas both inshore and offshore which could further disenfranchise their fishing opportunity.

There is therefore a requirement that time is given to IFGs to consider their own management mechanisms, and to explore more thoroughly data collection systems which will help to evaluate the stocks they wish to sustainably target.

One thing is clear. It is now time for those representing **all** with an interest in the marine environment to be given **equal opportunity** and **time** to produce and evaluate relevant information, and which hopefully can displace suspicion and mistrust and open the way to constructive and sensible solutions across all aspects of this precious asset.

NOTE

As Chair of the North West Inshore Fisheries Group, I feel it would be inappropriate to make specific comment on species or habitats at this time, given that we are a relatively recent body developing local fisheries management. We are presently investigating with members how we might progress data-gathering systems to inform and support future submissions. We look forward to the IFGs being included directly in future discussions on MPAs and other management proposals affecting the inshore area.

Thank you.

Richard Greene