

Submission to Scottish Government Consultations on Planning Scotland's Seas – Scotland's National Marine Plan Consultation. Please note our response form is a footnote to this e-mail. I would appreciate an acknowledgement of safe receipt of this submission.

I write as Secretary of the charities Animal Concern Advice Line and Save Our Seals Fund and of the pressure group Animal Concern. These organisations can trace their roots back to 1876 and today continue the campaign to protect animals in Scotland and to conserve the natural resources and habitats our wild animals rely on for their very survival.

I personally have been campaigning on marine issues since getting involved in the campaign against seal culling in the 1970s. In 1970 I witnessed a whiting of 3lb in weight (a Scottish shore caught record had it been killed and confirmed) being landed at Rhu Narrows on the Clyde. Around the same time it was common to see 30 to 40lb cod landed off the Gantocks in the Clyde by anglers who, for decades, travelled from all over the UK to fish in the Clyde Estuary. Also in the 70s and early 80s I watched as increasing numbers of trawlers fished the waters of the inner Clyde Estuary and swept away populations of fish which had taken millennia to establish themselves in the Clyde.

Today the few local anglers who fish the lower Clyde are lucky to land the occasional small saithe or flounder and have to make do with the seasonal visit by mackerel which arrive in much smaller shoals of much smaller fish than just twenty years ago.

Rather than go over the various consultation proposals paragraph by paragraph I wish to make a general submission on what I believe is urgently needed to protect our marine habitats and the creatures which inhabit them.

The first thing which is required is a genuine commitment by the Scottish Government to protect our marine habitats and the creatures which inhabit them. For many years Government policy has been extremely biased towards those who use, exploit and abuse our marine environment for profit. This has most obviously been seen in the make-up of bodies appointed by Government to advise them in pre-consultation discussions and in the way Government Ministers, including the First Minister and Ministers specifically appointed to protect our environment, have acted to defend and promote industries which are causing extreme damage to our marine habitat and marine species.

For example the Seals Forum appointed to advise on how to deal with the issue of "managing" seals was hand-picked by the Government and was three to one weighted in favour of those who supported or were actively involved in the killing of seals. Despite several requests I was refused permission to join the Seals Forum.

Following consultations with the Seals Forum new legislation was brought in to license the shooting of seals by fishery and aquacultural industries. There is no legal requirement for fish farmers to use predator exclusion nets before resorting to shooting and no effort is made to police the situation to ascertain if limits on the numbers of seals shot are being observed.

Despite several very serious concerns over the adverse effects salmon farming is having on the Scottish marine environment our Government Ministers have, on numerous occasions, acted as international salesmen to promote the sale of Scottish salmon on international markets. This is especially true of the Chinese market. The irony of this is that our Government Ministers are selling salmon produced by Norwegian owned farms which get round a Chinese political ban on buying salmon from Norway by sending tens of millions of salmon ova from Norway to be grown on in Scotland and then sold to China. As these farms work hard to meet Chinese demand for their tartan-

tinted salmon they import chilled salmon from Norway to make up for the shortfall in supplies to retailers in the U.K.

Alex Salmond and his Ministers are acting as middle men and money launderers. They allow Chinese yuan to be changed into pounds sterling and then to Norwegian krone. While helping Norwegians avoid the Chinese ban on importing salmon direct from Norway the Scottish Government allows Scottish seals to be shot and wild Scottish salmon to be killed by infestations of sea lice from salmon farms. The Scottish tourist trade is damaged and our sea lochs polluted while Norway reaps most of the profit.

The Scottish Government does not only favour industrial scale foreign-owned floating factory fish farms over protection of Scotland's environment. They also support a commercial fishing industry with a long track record of over exploitation of the seas around our coast. Last year, while skippers of Scottish trawlers were in court being prosecuted for their part in two huge black-fishing conspiracies which illegally killed many millions of tonnes of fish, Scottish Ministers were in Brussels trying to get increased catch quotas for the disgraced Scottish fishing fleet.

If the proposed Scottish strategies on protection of the Marine Environment are not to be a total waste of public money then they must take drastic action to protect and conserve the marine ecosystem.

I suggest a few basic steps be taken as a matter of urgency.

- 1: A total moratorium on the expansion of marine salmon farming.
- 2: A ban on the shooting of seals in Scottish waters.
- 3: Compulsory use of high-strength, high-tension predator exclusion nets at all marine fin-fish farms.
- 4: A five year plan to relocate all marine fin-fish farms to on-shore tank based systems.
- 5: A ban on commercial trawling within three miles of the Scottish coast and islands.
- 6: A commitment to reduce all fishing quotas throughout the EU fleets.
- 7: A ban on all estuary netting of salmon and seatrout.

These steps would make a real difference and just might save our marine ecosystem from total degradation.

If the Scottish Government continues to pay lip service to conservation and environmental protection while encouraging and promoting industries and practises which are causing serious environmental damage, we will, within another generation, have nothing left to conserve and protect.

John F. Robins, Secretary to Animal Concern Advice Line, Save Our Seals Fund and Animal Concern
13th November 2013.

SCOTTISH EXECUTIVE CONSULTATIONS RESPONDEE FORM

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