

Chapter 3: Key Objectives & Approach to Policies

This Chapter is difficult to comprehend; it is not ‘an easy read’. There is a plethora of references to different policy levels. This may be unavoidable, however, further thought could be given to improve the layout of the chapter so that a clearer understanding might be achieved.

Under Strategic Objective, *Achieving a sustainable marine economy*, lists a goal ‘*Marine businesses are acting in a way which respects environmental limits and is (sic) socially responsible. This is rewarded in the marketplace.*’ There appears to be nothing in the Plan to expand on how this might be achieved. Is this an appropriate goal for marine planning?

The goal under the second Strategic Objective about ‘*equitable access*’ in relation to island and peripheral communities is an important one. Indeed, the Marine National Plan should go further, and explicitly support measures to redress the current imbalance between the fishing resources of the West Coast and the fishing capacity of businesses on the East Coast. There is a risk, otherwise, that the Plan will reinforce this imbalance.

This Chapter refers to the Marine Atlas. Unfortunately, the assessment in the Atlas does not sufficiently analyse economic activity in the fisheries and communities around the Scottish coasts. A proper assessment should identify:-

- a) the location (home port) of fishing capacity in the Scottish pelagic, demersal and shellfish fleets, categorised by size the vessel and crew numbers.
- b) the average landings by location, with destination markets identified and quantified.
- c) employment levels by location in fishing (active fishing and processing). These should be described in relation to overall employment in these locations.

Such an assessment should be updated and published regularly to help determine trends, and test how marine planning policy at national and regional levels is impacting upon the fishing activity taking place. It would assist, for example, in providing a clearer picture of the imbalance between fish resources and activity/value that besets communities on Scotland’s West Coast, where nominal employment numbers can mask their true significance and impact on places with scarce job opportunities.

Chapter 6: Fisheries.

Some of the stated Objectives for fisheries are concerning.

“Ensure fish stocks are harvested sustainably leading to exploitation of Scotland’s commercial fish stocks at maximum sustainable yield and with increased long term stability”.

It is not clear from the Plan how one determines whether fish stocks are being harvested in a sustainable manner. How is sustainability to be measured? Is sustainability to be assessed by reference to environmental and commercial measures? The Plan must clarify this explicitly. For example, it could be that fishing activity is being carried out sustainably in environmental terms, but by a fleet concentrated in a few large businesses with few, if any ties to the communities around which they access fish. Would this be sustainable according to the Plan?

“Tackle discarding through the elimination of unwanted catches.”

It would be pleasing to achieve such elimination, but this is surely unrealistic. It is not good practice to set out objectives that are not achievable.

"Management of fisheries on a regional sea-basin basis with the whole sector empowered in the decision making process."

This is an important Objective. However, it is not reflected in the Fisheries Policies listed in this Chapter. There is reference in Part 4 The Future that "...*spatial management in future years will become part of regional marine planning.....*" Why leave this important issue to some indeterminate 'future'? (And why limit such management to "*the inshore sector*", as Part 4 does?)

The establishment of sound regional management should be part of current policy.

“Help sustain vibrant coastal communities where fishing is a viable career option and value is added throughout the supply chain maximising the contribution fisheries make to Scotland.”

Why direct policy to sustain ‘*vibrant*’ communities only? Surely an aspirational policy should address all coastal communities. The loss of a job in a fragile community is proportionally more important than in a vibrant one in terms of the future health of that community.

“Have a fishing fleet which is a leader in global fishing practices and is able to secure a long term income from the available sustainable fishing opportunities across all sectors.”

The observations under the first Objective above are relevant to this Objective. In addition, what is a fishing business that is ‘*leader in global fishing practices*’ – the biggest, most capital-intensive and most technologically advanced? Or, is it

the most environmentally responsible? The Objective is woolly and superfluous and should be deleted.

Rather than comment on the detail of the proposed Fisheries Policies 1-8, here are some pertinent observations.

A major gulf exists between the current state of fisheries in Scotland and the belief that *"Scotland's sea fisheries have a healthy and vibrant future..."*

The Common Fishery Policy and concept of 'open access' have had huge adverse effects on Scottish fishing interests. UK governments have regularly failed to adequately defend these interests. We have the negative effects of transferable quotas; quota held by parties with no interest in Scotland other than its fish resources; an unhealthy concentration of quota in the Scottish East Coast fleets; a licensing system which permits a market in transfers at fantasy prices, involving speculation and leading to increasing concentration of fishing capacity in fewer hands; and an inability to counter the adverse impact of new technology, which leads to fishing opportunity more and more in the hands of the few businesses with access to sufficient capital.

There is also the vexed question, which has stalked the fishing industry for many decades...how to balance an ever increasing catch-capability against the need to protect and maintain healthy stocks of fish into the future. Who's to say that in years to come we will not be pondering the fate of the scallop in the same way as the passenger pigeon?

Unfortunately, unless there is political will to tackle these issues, marine planning, no matter how well it is formulated and implemented, can only improve matters at the margins.