

Clyde Fishermen's Association

Secretary

Archie McFarlane

4 Maol Bhuie

Ardbeg

Isle of Islay

Argyll

PA42 7ED

Tel 01496 302 401

Mobile 07740 865 191

e-mail amf@clydefish.org

Planning Scotland's Seas

National Marine Plan

Response of the Clyde Fishermen's Association

1. The Clyde Fishermen's Association (CFA) supports and agrees with the response to this consultation submitted by the Scottish Fishermen's Federation (SFF). This CFA response should be considered additional to the SFF response.
2. The Scottish Government would claim to protect and support the Fishing Industry and the small fragile communities that rely heavily on the employment and financial investment that fishing brings to the fringes of Scotland. It is alarming to realize that the same Scottish government would devise a National Marine Plan (NMP) which seeks to remove that protection and support. The plan favours "Sustainable Development" over the long established fishing industry, and would intend to displace fishing activity from its place of operation. This displacement of economic activity would cause an outcry if attempted on land.
3. The "Sustainable Development" that the plan gives priority, is not required to prove its sustainability. The very real questions of economic sustainability are being ignored and an assumption is apparently being made by planners that the cost of that development will somehow magically be made to work in the future. There is a very real public fear that the developments will prove not to be economically sustainable but will require constant government funding to survive.
4. It would be a great irony if the fishing industry, as tax payers, would find the revenue collected from that industry is being used to fund the developments which will displace and possibly ultimately destroy that fishing industry.

5. Government would claim that developments will create investment and employment in the fragile communities currently reliant on fishing. There is no guarantee that any investment or employment will benefit those communities, that investment may bypass the fragile communities entirely and be mainland based.
6. Marine Planning in recent years has allowed the consultations with the fishing industry to be entirely ignored. Two separate consultations on consents have led to the issuing of those consents before the fishing industry response was even received. Subsequent complaints have had little effect. It is believed planners are failing in their duty to follow the Marine Policy Statement (MPS).
7. The MPS does not give priority to any particular economic activity at sea and is seen to have a balanced approach to competing activities. The NMP is not balanced or fair, to give a presumption in favour of development over existing activities is extremely dangerous especially where that development is economically unproven.
8. Development at sea is a consequence of the difficulties experienced by those developers on land. Acceptance by the public of renewable energy development on land has become increasingly difficult, that development has now been forced to find other locations. The locations at sea chosen for development have not been based on sound principles of minimum investment for greatest energy gained. The offshore developments are being forced into the most hostile and expensive development environment. Those developers have shown their inexperience of that hostile environment, this causes great concern that projects will fail at the point soon after they have displaced and destroyed the fishing industry.
9. The fishing industry is faced with a NMP devised by planners inexperienced in the offshore environment. Those inexperienced planners seek to give priority to inexperienced offshore developers.
10. The CFA has great concern that Regional Marine Planners will attempt to interfere with fisheries management. Marine Scotland manage fisheries in Scotland implementing EU, UK and Scottish regulation. Regional Marine Planners will have little experience or knowledge to enable fisheries management and should not be allowed to attempt to do so.
11. Given that the NMP is neither fair or balanced, the CFA would agree and support the SFF call for an investigation by an independent person into the proposals contained in the draft and to report on them.