

## Marine Scotland – Inshore Fisheries Pilots – Proposal Form

### Please note:

- Proposals should be completed on the appropriate form in line with the accompanying guidelines with supporting information as may be required.
- The selected area must be within the Scottish Marine Regions (<http://www.gov.scot/Topics/marine/seamanagement/regional/Boundaries>).
- Please be aware that Marine Scotland would expect Proposal Forms submitted to be made publically available.
- Proposals should be submitted to Marine Scotland by 30 September 2017.

### Details

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## **Proposal Questions**

1. Who is the recognised lead on the proposals, i.e. who is the primary point of contact?

A new organisation formed for the purpose. TBA

The inner sound management group

2. Please provide a background on the group proposing this pilot?

This organisation is a management board formed from local static gear fishermen and local fisheries associations. And will be constituted with advice from Marine Scotland.

Participating associations are The North West Responsible Fishing Association (NWRFA), The Torridon and Applecross Fishermans associations and the Scottish Scallop Divers Association. The Scottish Creel Fisherman's Federation (SCFF) have also been invited to assist in informing this proposal.

The majority of those fishing static gears in the area of the pilot are represented by those associations, however there will be individual fishers/vessels especially those from other sectors, and not in the mentioned associations, whom have not as yet had the opportunity to input into the proposals.

We may qualify for funding and or assistance in forming an appropriate group to work on behalf of the local fishermen and to be a point of contact for marine Scotland.

This group would consist primarily of local fishermen, however other groups/individuals may be permitted to join and the purpose of the group is to facilitate the project on behalf of the fishermen and their communities. The group will be constituted in accordance with the requirements of Marine Scotland.

3. Please summarise your proposal, including other options that you have considered?

The key aim of the proposed pilot is to trial separating mobile and static gear, and trial distinct local management arrangements within the proposed area.

With a view to develop a more prosperous low-impact community fishery, and to reduce gear conflict.

The location of this pilot would be on the west coast of Scotland, in an area known as the 'Inner Sound', which is the body of water situated between the Isle of Skye, Raasay and Wester Ross. The Inner Sound is currently closed to mobile gear for 6 months of the year (October - April), and the proposal is to extend this closure to a full 12 months (i.e. complete year-round closure to mobile gear).

The pilot will help inform our understanding of community approaches to inshore fisheries management, and will be an opportunity to trial *the development of a more sustainable, profitable locally managed inshore fishery*.

A move from a seasonal closure to a full time closure would immediately resolve the long-standing issue of cross sectoral gear conflict that has plagued the area since the removal of the 3 mile limit in 1984

There is an abundance of evidence that suggests that the inner sound areas presently worked exclusively by static gears employs more fishermen and generates more revenue than the areas worked either in a mixed fishery or a trawl only fishery .

In order to measure the effectiveness or success of the pilot, a monitoring program could be established which assesses the changes in revenues and employment generated, changes in conflict patterns, environmental changes on the seabed (e.g. benthic biodiversity and habitat structure) and prevalence of nephrops, fish species, and priority marine features sensitive to benthic disturbance (e.g. Sea Pens).

The pilot also offers the potential opportunity to contrast with other local “control” areas such as the present Trawl only zone north of Torridon, the Creel only areas of the Torridon box, the 30 year old no take zone of the BUTEC range the newly created “no take zone” of the expanded BUTEC range and contrast that with the changes brought about by taking an intensively fished mixed fishery area and excluding mobile gears.

We believe the pilot will demonstrate a decrease in gear conflict in the area, an increase in revenues generated, a potential increase in employment as well as environmental benefits like decrease in benthic disturbance, bycatch and discard of non target species.

We believe other potential benefits “may” accrue and may be worth investigating, such as an increase in the abundance of flora and fauna normally sensitive to benthic disturbance. And or a potential increase of species normally associated with bycatch in trawl fisheries

Further benefits include an opportunity to investigate and potentially trial fisheries management measures only practical in an exclusively static gear fishery. Such as, escape panels, increased minimum landing size and restrictions of individual and overall fishing capacity (for example, restricting individual vessel gear allocation and capping the number of licensed static gear vessels operating within the proposed management area).

Other possible benefits are reducing pressure on adjacent MPA's from creel vessels being displaced each year when the pilot area is opened to the mobile sector. In addition, if this pilot is proven successful, then it could potentially be used as a model elsewhere, and may provide supporting evidence for the benefits of separating static and mobile gear fisheries over larger areas (for example, if the much sought after 3 mile limit were to be introduced).

Other options previously considered include:

1. The status quo. (significant gear conflict and a poorer return on the resource base than evidence suggests is possible, as well as environmental degradation associated with nephrops trawl).
2. A mixed “community fishery” where vessels from all sectors, but only with significant historical track record, continue to “share” the area and attempt to manage it for their exclusive use. This option undermines most, if not all, the potential benefits of piloting a fishery closed to mobile gear, and involves very complex issues associated with defining “local vessels and track record”. It also requires significant cross sectoral cooperation which thus far has not been achieved, despite several attempts at mediated negotiation .
3. A more extensive area that also included the Portree Sound has also been considered, however those creel vessels operating from Portree area, and up the North East of Skye, felt that so long as there was no consequent increase in gear conflict in their fishing areas that their area should NOT be included in the pilot study at this time.

4. Please indicate clearly the geographical area you wish to propose for consideration as a pilot area (please provide a chart/image clearly defining the area).

The pilot area being proposed is the Inner Sound, presently subject to the 6 month winter closure to bottom trawling and scallop dredging (see Figure 1 below).

It runs from Isleornsay in the south to the Torridon box in the north. We are proposing extending the seasonal closure to mobile gear within this area to a year-round closure (see Figure 2).

## CURRENT FISHING MANAGED AREAS AND MARINE PROTECTED AREAS

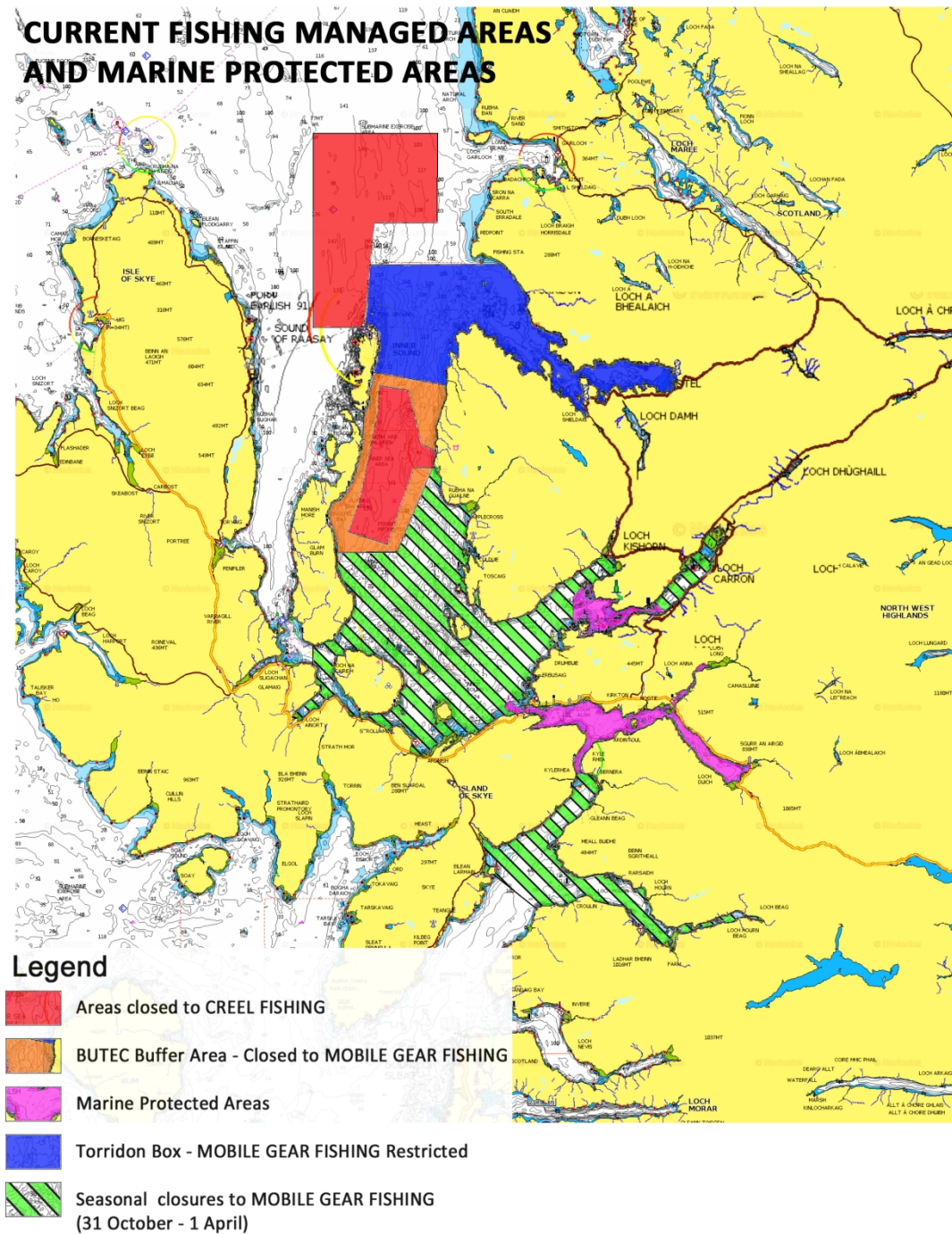
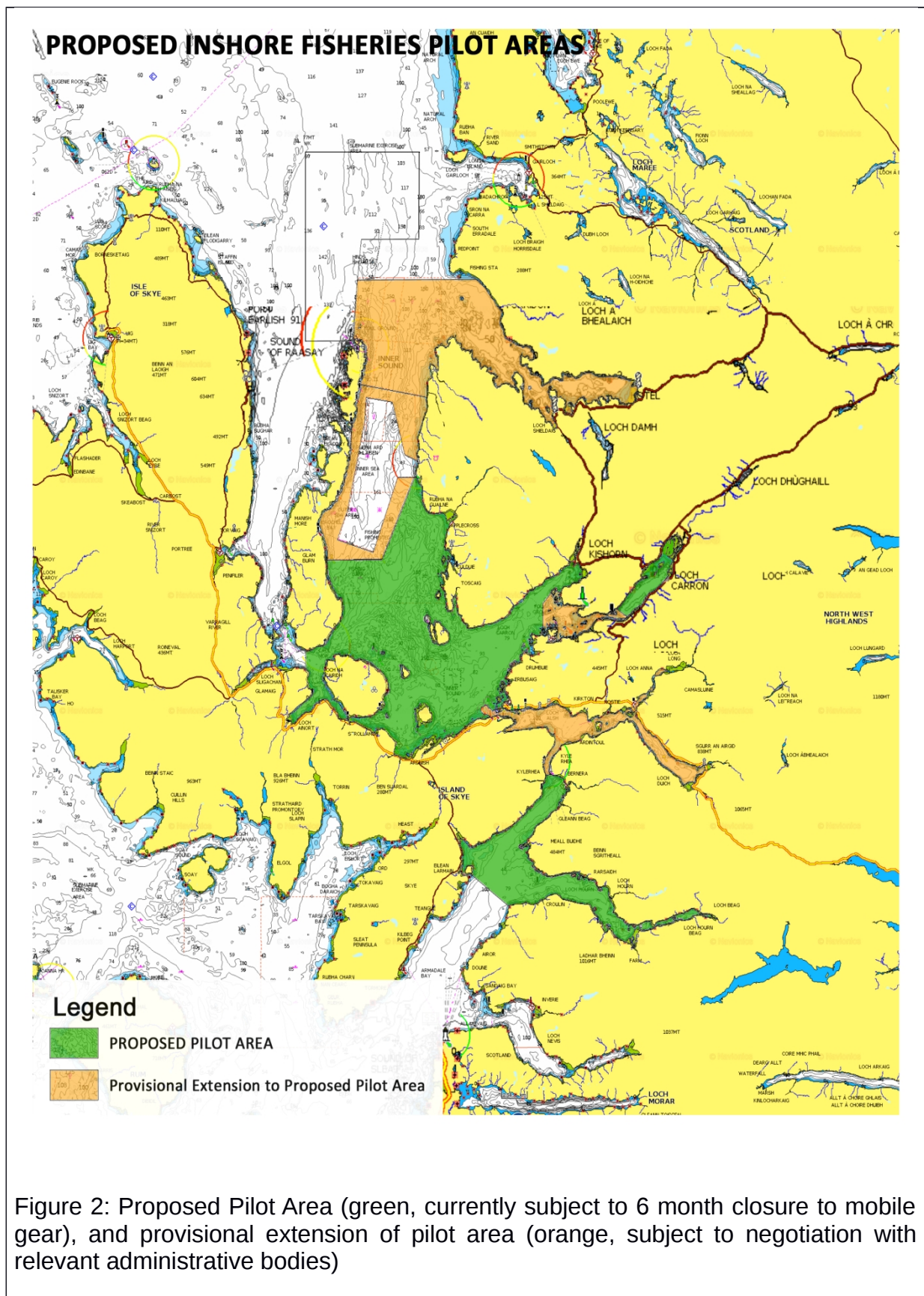


Figure 1: Map showing areas of current year-round and seasonal closures to mobile gear (bottom trawl and dredge), as well as Marine Protected Areas





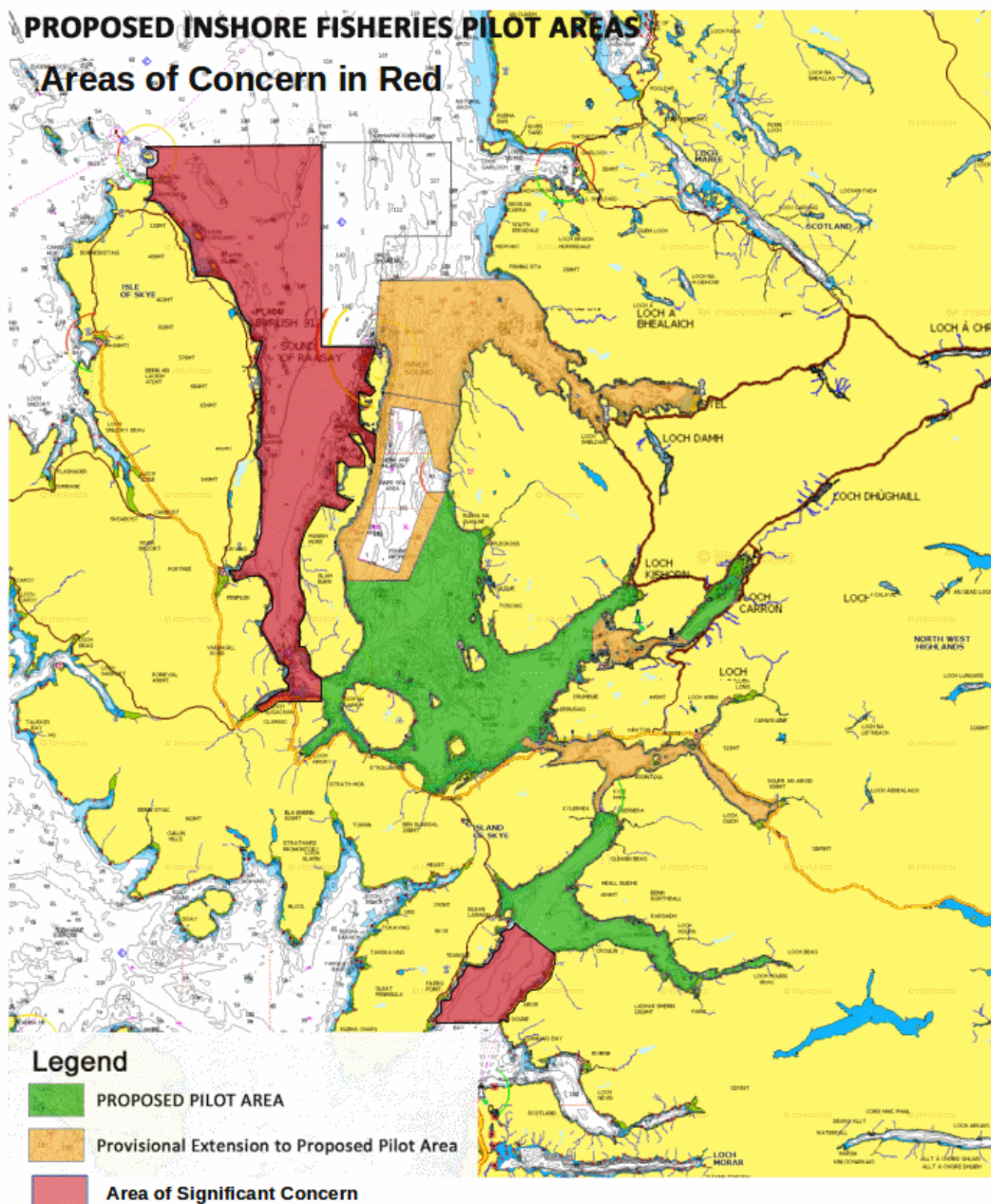


Figure 3: Pilot area and “areas of concern”. Areas marked in red are where concerns have been expressed by fishers that there is a high likelihood of increased gear conflict.

5. How would you categorise your proposal. If you feel that none of these options are applicable please select 'Other'.

Localised approach to fisheries management ☐yes

Separating different methods of fishing ☐yes

Other ☐

6. Are you aware of any statutory or voluntary arrangements already in place within your proposed pilot area?

See Figure 1 above. The proposed pilot area is presently subject to a 6 month winter closure to mobile/trawl fisheries.

There are two MPA's in the area, one the "Lochalsh, Duich and loch long MPA" and the other the recent "emergency MPA area of Lochcarron".

The area is bounded on the North by a Trawl only Zone.

The area is also home to the recently expanded BUTEC submarine testing range which includes an extensive no take zone, as well as a smaller "buffer" static gear only zone.

7. Please outline any interaction you have had with the relevant Regional Inshore Fisheries Group (rIFG) in the development of this proposal?

The West Coast regional IFG (which meet in Glasgow, 200 miles away) has been approached both on the present proposal and on a modified proposal of a local mixed fishery (as outlined above).

There is a sub-group of the WC - rIFG which was formed in winter 2015/2016 to address the expansion of the BUTEC facility, and which has met several times to discuss this proposal and variations of it. The sub-group made little progress in discussing this proposal due to animosity/lack of cooperation from the mobile sector.

The sub-group did make some progress in discussing the potential for a local only mixed fishery, however many complexities were identified that hindered progress, such as establishing and defining "local fishers" and appropriate mechanisms to establish track records.

Unfortunately the good-will associated with the previously proposed local mixed fishery has been lost. This is due to a substantial influx of 'new' (visiting) trawl vessels fishing the Inner Sound in 2017, which has escalated gear conflict and placed greater pressure on the nephrops resources. This has further been compounded by the displacement of vessels as a result of the expansion of the BUTEC facility in 2016. As such, agreeing a basis for "local vessels" and track record is now more difficult than ever.



The WC-rIFG did comment on the proposal calling for full-closure of the Inner Sound to mobile gear, and members of the rIFG were critical that any such proposal would potentially create a precedent that may facilitate more creel only areas being piloted around the coast. The WC-rIFG was not supportive of such a precedent being set and accordingly were not supportive of pilots involving static gear only zones.

The WC-rIFG did facilitate a series of meetings (in Kyle of Lochalsh, 2016) between local fishers and their associations via the local BUTEC sub-committee group and although most of these meetings were acrimonious and many were boycotted by the mobile sector, there was some success in developing a potential plan. However this outline plan was debated by the west coast regional IFG (quarterly meeting held in Glasgow) and more potential problems than solutions were identified. It is not felt that the mixed gear local boat only plan is capable of addressing all the problems identified, or of addressing all the same range of opportunities offered by piloting a complete closure.

It is evident that that the WC-RIFG will find it difficult to back any proposal where a precedent may be set that gives the perception of 'favouring' one sector over another, regardless on the soundness of that plan. This is mainly due it being a consensus based organisation, in which the static and mobile associations may battle to come to agreement on specific issues (such as spatial management). Accordingly it is proposed that further substantial input from the WC-RIFG will not be conducive to developing a local fisheries management plan for the inner sound and adjacent sea lochs.

For this reason we propose the principal players in developing the inner sound management plan are the 'Inner Sound Management Group', and those individual fishing businesses that derive a substantial part of their incomes from the area.

8. What engagement have you had with any other groups or fishers working in your proposed pilot area in developing this proposal?

We are presently discussing options and the formation of an Inner Sound Management Group with local fishing associations who have a substantial membership of static gear vessels operating in the area.

The principal associations representing the vast majority of fishers in the area are the Inshore Fishermen's Association for Torridon and Applecross, The Scottish Scallop Divers association and The North west responsible fishing association.

We have had extensive discussions with creel fishers, and their association representatives operating from the Portree area and working the North east of Skye (the waters bounding the pilot area to the north and west). Many of those Fishers do not currently support a closure to mobile gears in their area, however they have significant concerns about the possibility of increased gear conflict. Those fishers are looking for reassurances and safeguards against such a potential increase in gear conflict. For this reason we are proposing a "holding position" which would leave the area of the Portree Sound out of the gear separation trial in the interim but that could facilitate a series of safeguards, if need be, to mitigate any increases in gear conflict in the area.

There are other associations which represent the mobile visiting vessels, and discussions have been held with some of those associations previously via the Regional IFG BUTEC sub-committee group. Associations in attendance of the BUTEC Sub-Group meetings include. Mallaig and North west Fisherman's association and others?

It is not felt that the associations representing the mobile sector will be supportive of a static gear only pilot. Nor is it felt that in light of their lack of support for such a pilot that those associations will be able to offer much in the way of constructive input to creel-only management measures. However, if this pilot is accepted, the Inner Sound Management group (ISM) will strive to maximise community well-being, and minimise the hardship felt by any displaced vessels (e.g. Facilitate transfer from one sector to another, assist with training/apprenticeships if required). It will be challenging to find a win-win solution, however the ISM are open to finding solutions that progress community well-being as a whole.

Careful consideration will have to be given to 'nomadic' or 'visiting' vessels and the ISM are aware of the complications therein. Key to the success of this community-led pilot will be ensuring that large associations representing mobile sector (who's vessels mostly operate outside the proposed area) have minimal/limited impact on the decision making process, or that their input is weighted in accordance with the number of vessels they represent within the proposed area.

9. How many fishing vessels do you estimate currently work, both full and part time in the area proposed and how many will be involved in the pilot?

There are around 35 to 55 nephrops and scallop vessels fishing in the proposed pilot area with around 30+ of those being full-time creel boats who operate exclusively in the area. There are approximately another 5 creel vessels that operate partially in the pilot area, and partially outside.

There are about 5 to 6 part-time local trawl vessels (operating less than 5 months per year), which derive a significant part of their income from operating in the inner sound during the "open season", and a further 5 to 8 part-time trawl vessels that derive a component of their annual income from occasionally fishing in the inner sound.

There are two full time scallop dive vessels and several visiting scallop dive vessels, as well as occasional visiting scallop Dredgers.

This totals approximately 8 to 10 vessels that derive part of their income from scallop fisheries in the area

10. Please clearly set out the management controls you would wish to see for the pilot and the rationale for each control proposed.

Management Measure	Rationale / Possible Positive Consequences	Possible Negative Consequences
Extend present 6 month closure of the Inner Sound to Mobile gear (Oct - April) to full time closure	<p>Reduce gear conflict.</p> <p>Facilitate static gear only pilot.</p> <p>Evaluate environmental changes in discrete environment.</p> <p>Allow a trial of industry led localised fisheries management.</p> <p>Increase employment and revenue from the Nephrops fishery.</p>	<p>Restricted opportunities for mobile operators in the area.</p> <p>If successful may be subject to “Honeypot effect”</p> <p>May cause increased gear conflict outside the pilot area (especially Sound of Raasay (Portree Sound) and Sound of Sleat (northern part)</p>
Possibly restrict the numbers of creel vessels/ gear deployable in the area	<p>Ensures that stocks are not overfished by too many new vessels entering the fishery, or from an escalation in effort (“honeypot effect”).</p> <p>Will limit within-sector gear conflict and competition for space.</p> <p>Gives opportunity to trial management/monitoring/policing of gear restrictions in static fisheries</p>	<p>Requires careful design and flexibility to ensure achieves desired goals.</p> <p>May be hard to legislate and will require some policing mechanism.</p> <p>May require an upfront cost for purchasing an introducing creel tags and an appropriate form of vessel monitoring. Decision to be made whether this cost would be covered by the individual vessels, or if external funding could be sourced.</p>

Management Measure	Rationale / Possible Positive Consequences	Possible Negative Consequences
Consider an increase in minimum landing size for nephrops	<p>Potential to increase the health of the stocks (with the theory that if animals are left longer at sea then they are given more opportunities to reproduce)</p> <p>Potential to positively influence market value and income (larger prawns fetch a higher price)</p> <p>Mixed fisheries preclude trialling changes in minimum landing size, and any such trial requires a static only fishery and a discreet population of prawns to establish credibility.</p>	<p>Identifying which factors are affecting prawn stocks will be complex and it will be difficult to measure the effectiveness of this management measure due to multiple confounding variables. Independent scientific evaluation would be required to measure the effectiveness of this management measure, which may be costly.</p> <p>May be financially negative for those fishing in areas with an abundance of small prawns.</p> <p>May result in an over-abundance of small prawns on the grounds.</p>
Facilitate entry into the fishery from those local fishers with substantial track record within the trawl sector	Could offset potential negative impacts from prohibiting mobile fisheries especially for individuals deriving a significant component of their income from trawling in the inner sound	Could lead to an over subscription of the fishing opportunities and could be hard to establish the thresholds for entitlement.
Increase monitoring of gear conflict in Portree Sound and Sound of Sleat (northern part) and if required consider a Horsepower limit or restrictions in LOA or compulsory vessel monitoring systems or if required a full mobile gear closure.	Could help prevent, deter and if required mitigate increases in gear conflict in areas immediately adjacent to pilot. Can address and alleviate concerns from local creel vessels whilst facilitating continued static and mobile gear fisheries in those areas	<p>Could be seen as a way of extending the pilot area.</p> <p>May increase the work load on fisheries protection.</p>



11. If your proposal involves limiting the number of vessels able to fish in the pilot area. Please outline:

- a. On what basis vessels will be permitted access e.g. method of fishing, vessel size, historical activity in the area (if so what would track record be)?

Only vessels under 12m loa, working with static gears (including dive fisheries and line) will be permitted access to the fishery.

Only vessels agreeing to the Inner Sound Management plan would be allowed to fish within the Inner Sound Management area.

No vessel will be entitled to operate any more that 1600 creels/pots of any type.

Any management options contained within the management plan would be compulsory. ie. Individual gear allocations, minimum landing size etc.

It is possible that if the fishery becomes (in the view of the inner sound management group) or Marine Scotland, oversubscribed, then restrictions on new vessels entering the fishery will have to be put in place.

The fishery will be deemed 'oversubscribed' if the local shellfish stocks start to show a significant decline in relation to increasing effort, or if there is an escalation of gear conflict between creel fishermen. In the past it has not been possible to detect local changes in shellfish stocks using landings data submitted to the MS Fisheries Office (in logbooks or Fish1 forms) because it was/is compiled per ICES rectangle (35nm grids). However, The ISM group is aware that the new Fish 1 form (introduced July 2016) asks for the Lat/Long of the first hauling position and the port of departure, and would like Marine Scotland to demonstrate if this data alone would be sufficient for local based management. If it is not sufficient, then detecting local changes would involve establishing a monitoring program whereby landings per unit effort (LPUE), and possibly other fisheries data, are recorded at a locally relevant scale (e.g. 5x5nm squares), ideally working in partnership with an academic institution for processing/analysing the data (or Marine Scotland).

It is envisioned that fishing opportunities and gear allocation will be prioritised for incumbent vessels, those with the most substantial track record, and those deriving the most significant part of their income from the pilot area.

A 'substantial' track record will include providing evidence of fishing for several years or more within the Inner Sound Management area. This may be supplied in the form of landings records for the Inner Sound Management Area (logbook data), which can be supplemented by other data sources if available (e.g. record of having participated in the Scotmap Survey, provision of historical plotter data, or some form of vessel monitoring data if available).

If required it is possible to restrict access to the fishery by means of restricting gear allocation to new vessels or by not allowing new vessels into the management group.

Swapping one vessel for another will not be considered a new vessel entering the fishery, however any fisher adding additional vessels will be subject to the same criteria that any new incoming fisher would have to meet. Any gear restrictions and or if the fishery is over subscribed inability to join the fishery.

All vessels currently deriving a majority of their income from the area will be given priority to access the fishery in the first instance, followed by those who derive a significant element of their vessel earnings in order of highest percentage first. Until such a time as the fishery is fully subscribed.

- b. Please outline your rationale for the basis for restricting access as outlined in question 11 (a)?

The primary basis for restricting access to the fishery will be by fisheries method/gear type. This is required in order to evaluate a static gear only management pilot, non static gears must inherently be prohibited.

The use of mobile gear within the management area would undermine the effectiveness of certain management measures, for example trying to increase the minimum landing size of creel caught prawns in order to enhance stocks.

A secondary mechanism for restricting access to the fishery will be by adherence to the local management groups policies on gear allocation, gear type, minimum landing size etc. The rationale behind this is that all vessels fishing in the area should have a level playing field and not be prejudiced by having to fish to different rules to their neighbour and the whole principal of a pilot is that we establish an evidence base to a set of management options, this will be almost impossible if the management options are not applied to all vessels fishing in the area.

A third restriction will be in the overall amount of gear any vessel can deploy. This amount will be capped initially at 1600 creels. This gives us the opportunity to trial both appropriate amounts of gear per vessel and establish mechanisms for policing of such restrictions. This figure is provisionally locally agreed and is also the figure advocated by the Scottish Creel Fishermen's Federation as the amount that should be adopted as the national limit within 3 miles of land.

The last restriction of access to the fishery will be based on the potential for over subscription, be it because of perceived new opportunity, speculation, gear conflict, reduction in stocks in relation to increased effort (the honeypot effect) or another factor. There may come a time when local fishers/Marine Scotland or another agreed body conclude that the fishery is being exploited at its maximum sustainable potential and/or that any increase in effort would be detrimental to the project. If this scenario develops it will be necessary to prohibit new entrants to the fishery pilot area. This can be done by making a "0" gear allocation available.

- c. Would those entitled to fish in the pilot area be limited to fish there only? If the answer to this question is 'no' please outline why access to other areas is required and why the proposed pilot does not include these areas.

Some of the vessels presently operating in the pilot area only deploy a proportion of their gear in this area mainly due to historic fishing patterns and due to local geography. Obliging such vessels to fish all their gear in the pilot area could lead to substantial hardship and possibly serious danger for those vessels as well as increased effort within the pilot area. It is envisioned that access to the pilot area will be based on track record and that those fishing within the pilot area will be obliged to adhere to the management plan when fishing within the area.

In order to monitor and assess the pilot, those vessels working both inside and outside the pilot area may be required to log which elements of their catch derive from within and without the pilot area.

It is worth noting that it will be almost impossible to find a discrete area where there is no vessel working on both sides of the line. Even if the pilot was the whole of the 3 mile limit area this issue would persist, this gives us the opportunity to pilot how such arrangements can be made and what the issues are in regulating such a scenario and should be considered an opportunity to address this problem.

12. How do you propose oversight of this pilot project, should your application be successful? Do you envisage that a steering or monitoring group will be set up? How would this function?

The principle management group should be the local fishers and a new group will be formed for this purpose. However oversight and ultimate responsibility for the project and evaluation of its outcomes should rest with Marine Scotland especially when a significant component of the pilot is Informing future management considerations of inshore fishing.

The regional west coast IFG should be kept informed of progress and be entitled to offer advice and assistance when required and other appropriate organisations may be required to evaluate various components of the pilot, such as environmental and science related. The ISM group would also be open to Marine Scotland bringing in external expertise, when relevant, to support the pilot and development of their fisheries management plan (e.g. consultants that specialise in resource management, stakeholder engagement, stock assessment, conflict resolution, environmental economics etc). However, the ISM would not be able to cover the cost of such consulting work.

13. Please outline what you believe the direct and indirect benefits of your proposal will be?

The primary benefit may be that Marine Scotland and Scotland's fisheries industry will have an evidence base on which to base future inshore fisheries management decisions.

The direct benefits will be for our community and our local fishermen as well as the local environment. Though there will be wider national implications from a better understanding of the economic benefits of managing fisheries in a different way.

Those will include reduced gear conflict, increased revenues from the fishery and increased employment as well as the trailing of restrictions on static gears like overall allocation and methods of policing.

Other benefits will include less bycatch, discards and benthic disturbance within the pilot area.

14. Please outline any groups who you believe may be negatively impacted by your proposal and why?

The primary negative impacts will be felt by those vessels who utilise mobile gear and derive a significant part of their incomes from fishing in the area when it is seasonally open as they will either have to change their fisheries method to comply with the local management plan or derive that income from other areas.

Next would be those fishers within the pilot area whom presently work in excess of 1600 creels as they would be forfeiting the right to work those creels within the pilot area and may as a consequence not be able to work those creels at all.

The next most negatively impacted fisheries group would be either new static vessels or existing static vessels whom may be restricted in arriving/relocating to the pilot area, especially if the pilot area becomes over subscribed and no new vessels are given gear allocations.

The static vessels who work in the areas immediately adjacent to the proposed pilot area have significant concerns of a potential increase in gear conflict. Those areas are the Raasay Sound (area between the isles of Skye and Rassay/Rona) and the northern part of the Sound of Sleat. The local static fishers have been keen not to exclude mobile fishers from these areas, however there is no guarantee that such good will will be reciprocated. There is a significant danger of increased gear conflict deriving from both displaced trawl effort and from the "perception" that adjacent static vessels should have to work their gear in the pilot area. We propose a "holding position" to help address this potential problem from arising and to mitigate it if it does. Our proposal is that those areas be monitored closely for increases in gear conflict and that a series of measures be available to be put in place in the event of them being required. The measures we believe appropriate and able to mitigate gear conflict would be an introduction of a horse power limit, restrictions on vessel size able to work those areas and ultimately if the problems were to persist then a full closure to mobile gears would have to be considered. We would like to emphasise that the creel fishers in those areas are keen to keep those areas open to mobile fishers and are not seeking those areas to be closed as part of this pilot proposal, they however are looking for safeguards to stop them being penalised by increased gear conflict on account of the adjacent fisheries pilot's.



15. Please outline the costs of your proposals both in terms of financial costs and resource costs.

It is possible the pilot could be cost neutral or any potential costs could be met by fisheries/community/sustainability related funding.

The principal costs are those of facilitating meetings and then oversight of the project. As well as those costs incurred by marine Scotland in managing/policing any pilots.

Any science related costs could be externalised by inviting science based organisations to work and fund independently and share the data/outcomes. Fishermen from the Inner Sound area already have a track record of working in partnership with science, and have volunteered to gather data for the EFF project "Evidence Gathering For Sustainable Inshore Fisheries Project" (2014/15) , the "Scottish Inshore Integrated Data Systems Project" (SIFIDS, Dec 2016 and ongoing) and the SCFF Creel Mesh Size selectivity Project (2014)

It is possible to introduce a tag scheme to assist in regulating creel numbers and it is possible a at cost charge could be made for such tag's, however it is envisioned that Marine Scotland could facilitate policing via existing fisheries patrols and that there would be a significant element of "self policing".

The estimated costs of supplying the tag's per vessel are ??

16. Please outline any risks to the successful implementation of your proposals either in terms of the management or the overall return from fisheries impacted?

That there is loss of opportunity for some mobile and static vessels thus marginalising their businesses.

There is a significant concern that this pilot may trigger increased gear conflict in the immediately adjacent areas and although we have proposed a "holding position" which will hopefully go some way to address this issue, there is that possibility that successful implementation of this pilot will require some action outside the pilot area.

Another risk is over subscription either from existing vessels, mobile operators wishing to change gear type to creel or from new start-up creel vessels taking advantage of the newly created opportunity within the inner sound.

We can restrict the existing fleet from oversubscribing by introducing a gear cap and we can reduce the risk of over subscription by mobile sector transfer and or new creel vessels, by capping the overall effort within the sound and offering gear allocations on the basis of track record.

17. Do you envisage the pilot management controls outlined in this proposal having any impact (positive or negative) outside of the area detailed in question 2?

There are areas of significant concern outside the proposed pilot area (marked on Map above) Where the local creel fishers have elected not to close off grounds to mobile vessels and participate directly in the pilot but have concerns about the possibility of increases in gear conflict. Although not directly part of this pilot proposal those areas may see a significant increase in mobile activity and local fishers are very concerned about the potential for “bad feeling” between the nephrops creel and trawl sectors. To facilitate ongoing mobile access to those areas whilst attempting to mitigate this concern without directly including those areas in the pilot proposal, local fishers are keen to adopt a “holding position”. This would be that so long as there is no substantial increase in gear conflict, their areas should remain excluded from the pilot study. However in the event of gear conflict becoming a significant problem the local creel fishers are requesting that options should be made available as part of this application, to assist in addressing/mitigate any such conflict. (please see “management measures” above for detail.

In the longer run there may be a greater abundance of fish and other species within the pilot area and as such there should be some “overspill effect”.

18. Do you know of any evidence to help support your proposals? For example research documents, previous schemes, personal records or observations you may wish to provide?

Scotmap clearly shows that areas where static gears are worked exclusively generate higher revenues and employ more people than mixed fishery areas and trawl only areas.

There is a study on the potential benefits of increasing MLS in the area, <http://www.masts.ac.uk/media/35878/wp6-integrating-stock-management-considerations-with-market-opportunities-in-the-scottish-inshore-fisheries-sector-a-pilot-study.pdf>

Which shows that there are huge potential benefits from an increase in MLS within the static sector but only in discrete populations of prawns and static only fisheries and that such benefits cannot be realised in mixed fisheries.

There is the recent “assessing the options for change” document commissioned by the Scottish government, <http://www.nls.uk/scotgov/2015/9781785440427.pdf> Which shows that closing areas to mobile gears can have significant benefits in employment and revenues generated in the fishing industry.

There is the Scandinavian trial which demonstrates the life cycle costs associated with static and mobile nephrops fisheries.

[https://www.researchgate.net/publication/259678322\\_Environmental\\_life\\_cycle\\_assessment\\_of\\_Norway\\_lobster\\_Nephrops\\_norvegicus\\_caught\\_along\\_the\\_Swedish\\_west\\_coast\\_by\\_creels\\_and\\_conventional\\_trawls\\_LCA\\_methodology\\_with\\_case\\_study](https://www.researchgate.net/publication/259678322_Environmental_life_cycle_assessment_of_Norway_lobster_Nephrops_norvegicus_caught_along_the_Swedish_west_coast_by_creels_and_conventional_trawls_LCA_methodology_with_case_study)

There is the recent SCFF commissioned document which demonstrates the benefits for employment and revenues associated with creel fisheries which are being squandered in mixed fisheries.

<http://www.scottishcreelfishermensfederation.co.uk/report/CORRECTING>

There is the Clyde document which shows the decline in fin-fish since 3 mile limit was opened and the dangers of an oversimplified ecosystem.

<http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0011767>

There is the MPA's which have clearly acknowledged that creel fisheries are far more benign to the environment than mobile gears and can be tolerated within almost all areas of all MPA's

There is the IFG documents which were prepared for the purpose of demonstrating the value of existing fisheries within the inner sound (for the BUTEC proposal). Which clearly show the disproportionate value of creel fishing to the area.

There is the new economics foundation document that finds that for inshore waters the creel fishery offers better value to Scotland than trawl fisheries.  
<http://neweconomics.org/wp-content/uploads/2017/02/Griffin-Nephrops-latest.pdf>

There is the Gear conflict task force report which clearly identifies the area as a gear conflict "hotspot" and argues that present fisheries management options are insufficient to address the problem.  
<http://studylib.net/doc/7015974/final-version-report-of-the-task-force-on-gear-conflict>

19. Is there any additional information which you have not provided elsewhere in the form relevant to your proposal?

There are several areas of the Inner Sound that are presently subject to management measures that are compatible with this application but are not presently included because those areas require approval from the relevant management groups/authorities.

This application as it stands is only for those areas of the Inner Sound that are not subject to other management measures and that are presently seasonally opened to mobile fishing gears.

It is envisioned that subject to appropriate approval's the management measures proposed herein and in future those proposed by the Inner Sound Management Group would also include those areas of the Inner Sound that presently allow static gears all year and that presently have seasonal or permanent restrictions on mobile gears.

Those areas that we hope can be included in future are marked on the map's above in Figure 1. The Torridon box, the Buffer zone of the BUTEC underwater testing facility and the areas covered by the Lochalsh and Loch Carron MPA's.