



IMG - January

Finlay Carson MSP
Convenor
RAI Committee
Scottish Parliament

Letter by email

14 February 2023

Dear Finlay,

Spatial management of Scotland's inshore waters

I watched your recent Committee session regarding Petition PE1951 with Alistair Bally Philp with great interest, and appreciated the time the Committee took to consider his very worthwhile evidence.

In particular I would like to endorse his comments that the Scottish Government is under a legal obligation to achieve Good Environmental Status, and that modern spatial management is the best approach to adopt to achieve that goal, while also supporting larger and more resilient fishing fleets.

Whilst we see the argument for keeping Mr Philp's petition open, the Committee's agreed approach – to consider a potential coastal limit on the use of mobile dredge and bottom-trawling fishing gears within the wider context of inshore fisheries management – is one we strongly welcome.

The purpose of marine spatial planning is to ensure that all legitimate stakeholders can operate sustainably alongside nature restoration; so your Committee's decision to look at the management of a modern inshore limit holistically is sensible. SIFT believes that this would enable a more considered response to the kind of 'spatial squeeze' issues which your Committee heard about from Mr Philp last week and from numerous stakeholders at the Committee's inshore evidence session held in October 2022. Many of the economic and environmental challenges in Scotland's inshore waters stem from decision-making happening in 'silos' which look at nature or specific economic activities out of context.

We also share the Committee's view, as we understand it, that making progress with inshore management will depend on the Scottish Government's ongoing workstreams. The prospects for rapid change are, we believe, uncertain. On one hand, there are positive commitments in the Bute House Agreement, including the prospect that Ministers may consider modern spatial management. Pending the Regional Marine Plans promised under the Marine (Scotland) Act 2010, it is SIFT's view that the best route for the core changes required would be a National Marine Plan 2 which is radically unlike its predecessor. On that front, as you may have seen, the Minister informed Paul McLennan MSP [last month](#) that consideration is being given to including detailed spatial plans within NMP2.

On the other hand, the [Future Fisheries Strategy Delivery Plan](#), published last September, is barely more than a restatement of the status quo, and contains little or no actual 'delivery'. The chaos around

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the Clyde cod spawning closures and the repeated rejection of a spatial management pilot in the Inner Sound both illustrate that progress has a history of being botched or blocked.

There are therefore two questions around that broader future work which we would urge you and your colleagues to consider, having closed petition PE1951.

First, what evidence might it be useful to hear from independent scientists and marine economists? As the round table showed, this can be contentious, but SIFT believes that where work is peer-reviewed such evidence can make an essential contribution. We would strongly recommend the Committee convene a session where evidence from scientists and economists with expertise on all inshore matters could inform the Committee of the challenges faced.

And second, what should the timescale be for your Committee to carry out that wider consideration? We are of course aware of the intense pressure on your work programme, but I would say our greatest concern here would be if your consideration of these issues only takes place as you review final draft proposals from the Scottish Government (most crucially re NMP2, but this applies to other policy strands too).

Your Committee is extremely well-placed to hear from all stakeholders at an earlier stage in the NMP2 process, and the other Scottish Government workstreams, and in a fairly concise way. Making early recommendations to Ministers would, we think, maximise Parliament's input and better inform the Scottish Government's processes. As the Clyde cod example in particular shows, policy which emerges fully formed from a black box process is rarely well thought-out. A Scottish Government consultation can be useful, but a short Committee inquiry could be much more transparent, inclusive and iterative, and give these issues the public space they deserve.

In any case, if we can be of any assistance whatsoever during your forthcoming work on the inshore, please do let me know.

Kind regards

Charles

Charles Millar
Executive Director
SIFT