



10/02/2026

The draft Sea Fish (Prohibition on Fishing) (Firth of Clyde) Order 2026 – proposed targeted scientific programme – CFA Correspondence.

Dear Convener and Committee Members,

We write in respect to the Clyde Cod Box Closure SSI 2026.

Firstly thank you for permitting the Clyde Fishermen's Association to give evidence in Parliament on the 28th of January 2026.

We also appreciate the Committee staff took on board our request to permit two local fishermen to also attend after viewing the initial attendee list. The local inshore fishermen, both static and mobile, are often best places to advise on the real-life impacts of the Clyde Cod Box. They observe science every day and indeed endure the socio-economic impacts as a result of policies. I personally believe they brought helpful balance and practical insight to the Committee.

In numerous forums over the years, we have noted the Clyde Cod Box Closure was primarily a political decision, and we have many concerns about the process from the start, including the initial rerunning of a completed consultation. So much controversy has happened in the last few years over this issue, it has now become difficult to keep up with every aspect. Perhaps it is also unhelpful to do so if a sensible way forward is to be found.

The Clyde is not an exceptional area, trends common to this area will be similar in areas around the coast. The fact the local sustainable fishermen suggested implementing a voluntary seasonal closure two decades ago has led progressively to the current less than ideal situation. The initial purpose of the Cod Box has been changed and at times

forgotten. We fear without sensible remedy the issue will continue to unjustly remain a source of unhelpful media campaigning and politicking rather than reaching sensible solutions. When the future of people is at stake, we cannot support that.

Strathclyde University Model and Observer Data

We wanted to stress a few pointers from the discussion on the 28th of January. There was much reference to the model developed initially by a PhD student at Strathclyde University. It was noted there had been historic data gaps and data gaps over the last 5 years. However the data gaps start at 2019, meaning its closer to 7 years of a data gap.

The gaps have been a result of a reduction in scientific observers aboard fishing boats, and this was primarily related to Covid (which stopped and reduced observers) and a freeze on Observer recruitment at the time. It is not due to our local fishing boats being unwilling to take part in science or host observers. Indeed, our members wished to continue with observers and the extra trials we ran from 2016 to 2018. It should be noted though it can be more challenging to find local boats to take observers purely down to the fact that there are less boats operating in the area. However there is no will not to take out observers, quite the opposite in most cases.

As noted at the RAINE Committee we feel a number of issues in addition to fishing need to be factored into considerations regarding cod such as: natural predation, plankton/feed levels and changes in types of plankton, temperature changes, other sectoral influences (*eg under seabed cabling, spatial squeeze*) and the general change in composition of stocks in the ecosystem. All of these factors have a part to play, but there has been a significant focus on wild fishing.

Fleet Composition Changes and Effort

We want to stress in recent times our fleet has reduced by around 2/3rds, this has been a relatively large drop in a relatively short time scale, particularly since the implementation of the MPAs. The boat numbers and consequently the fishing effort have been much reduced and this needs to be recognised. The fleet and gear have changed even since 2019.

Selectivity – Changes and Restrictions in Gear

An important factor which wasn't really touched on heavily was the improvement in selectivity in gears over the years. The local static fishermen implemented a voluntary creel limitation scheme, one of only two in the country at the time. The mobile sector has a range of restrictions from weekend bans on fishing to MPAs.

In addition, in 2019 the West Coast inshore fleet were required to alter their gear to 300 square mesh panels to satisfy conditions from the EU. At the time a bycatch allocation for the area had been fished, but it must be stressed not by the local West Coast inshore mobile fleet themselves. However, it was the inshore fleet who altered their

selectivity further to remain at sea, and this should have assisted in minimising bycatch of cod even further since 2019. The observer data pre 2019 won't have captured these new changes in square mesh panels or their impacts. However again we stress the SFF bycatch studies in the Clyde prior to 2019 and before these additional changes were demonstrating around 1% bycatch of cod in the nephrops fisheries, which is very low. In the Committee it was noted "1% of what". All of the detail is publicly available on the reports produced.

Current Clyde Fishermen's Association Perspective on the Proposed Clyde Cod Box SSI 2026.

We recognise none of this situation is ideal, we would have preferred to return to the cod box situation which had been in place initially before 2022 and work on data gaps and management in a more measured way.

We also acknowledge if the current proposals are to be rejected there is a risk the area will continue to be used as the focus of a contentious media campaigns. Perhaps even more destabilising for local stakeholders, some parties may seek to pursue management outcomes by litigation. We believe both outcomes would be very negative to a fragile coastal and rural economy, which is already feeling the socio-economic impacts of the current Cod Box closure and its resource intensive processes.

We do feel a sensible way forward must be found to offer stability to the local small scale fishing communities. We also feel if there is an opportunity to increase scientific knowledge working with local fishermen, trusted scientists and Government, then this is an option which could be explored through a well-managed TSP. We are willing to work proactively with government and trusted scientific bodies to improve the data in the area, we always have been.

We regret the situation has come about as it has, however if suitable mutual conditions were adhered too between government and local fishermen, we would agree to a sensible TSP as opposed to uncertainty. Our small inshore fleet needs stability and with limited workable options we need to be willing to find a way forward.

Should the current proposal be rejected by the Committee we would remain willing to work with Scottish Government and trusted scientists towards data collection and management going forward. We stress though again the Clyde should not be managed as an exceptional case, national standards and parity across the board should be applied.

Correspondence

We would have been unlikely to have returned further correspondence, but we have noted the RAINE Committee has recently received further letters from other parties and felt we should perhaps also follow up with our perspectives.

As Clyde Fishermen's Association we have static gear and mobile gear fishermen as members who will aim to engage productively with the Government directly. Our static and mobile fishermen work together and are from the same communities, our aim is to help both to coexist in their own shared communities. We do not want to stoke any false divisions on gear types. We support both gears, and both work side by side and both have the right to fish fairly with sensible management in place. The framework of processing and exporting in the area rely on the structure of our mixed fleet, both gear types help to support the community and the markets.

We are happy to disclose our membership details to Government, especially those who are fishing in the Clyde Cod Box and directly impacted by the policies in the region.

We note another fishing organisation, the SCFF, is regularly corresponding on the Clyde Cod Box. We would suggest that any other fishing organisations commenting significantly on the policy also share their regionally impacted member boat details with Marine Directorate. We hope this would help establish if they have local members and to help ensure their member interests are transparently represented in any future management plans for the area through process. We understand they may wish to keep members details from the public, but we hope they will be able to share details confidentially with Government as CFA does. We feel it's important genuine local concerns and impacts are front and centre of any future processes, and equally that those not primarily operating in an area do not hold a more prominent position over local active fishermen.