

Dear Committee Member,

I am writing ahead of the forthcoming evidence session on the proposed Clyde Cod Order to briefly set out the Scottish Creel Fishermen's Federation's current position and the solution we believe offers the most pragmatic way forward.

You may already be aware that Robert Younger, Director of SCFF, previously wrote to a number of Committee members outlining concerns about the proposed Order and its alignment with the precautionary principle, alongside a note on the relevant legal context.

Building on that earlier correspondence, SCFF has **today written to the Cabinet Secretary** to set out what we believe is a constructive and precaution-compliant alternative approach. While we have not yet had the opportunity to discuss this proposal directly with Ministers or officials, we wanted Committee members to be aware that this option has now been formally put to Government.

In summary, we have suggested:

- a **time-limited, one-year precautionary Order**, framed explicitly as an emergency holding measure;
- a **proportionate approach to interim restrictions**, informed by best available evidence and risk, rather than a blanket deferral of effective measures; and
- the creation of a **structured, time-limited and outcome-focused forum**, bringing together scientists, fishers (mobile and static), regulators and environmental organisations, to identify options capable of materially reducing cod mortality and to report within a defined timetable.

We see this as the least-bad option in a difficult situation: one that avoids a further three years of effective stasis, preserves confidence that cod protection is being taken seriously, and creates the space for a genuinely solutions-focused process that many feel should already be underway.

While SCFF has not been invited to give oral evidence, we would be grateful if Committee members were able, where appropriate, to reflect this pragmatic framing during the evidence session—either by engaging with the Cabinet Secretary on the proposal we have put forward, by exploring similar options through the Committee process, or by emphasising the importance of a clear, time-limited decision-pathway and robust terms of reference for any future forum.

If it would be helpful, I would of course be very happy to discuss this further or provide any clarification in advance of the session.

Kind regards,
Bally Philp
National Co-ordinator
Scottish Creel Fishermen's Federation