



The Scottish Parliament
Pàrlamaid na h-Alba

Rural Affairs and Islands Committee

Mairi Gougeon
Cabinet Secretary for Rural Affairs,
Land Reform and Islands

29 January 2026

Dear Cabinet Secretary,

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

In advance of you appearing before the Committee on 11 February to discuss the above draft order, the Committee took evidence from a range of stakeholders at its meeting yesterday.

A number of issues were raised which it would be helpful to have further information on ahead of 11 February.

The Scottish Government's consultation analysis for the draft order states that the TSP will "operate year-round across the entire Firth of Clyde area for three years" and will "help identify critical habitats and enable an adaptive management approach (such as real-time closures) when aggregations of juvenile or spawning cod are encountered." The consultation analysis also outlines the following key priorities:

- Maximising use of available data, including creel bycatch and historical catch records.
- Monitoring cod bycatch across all fishing sectors.
- Investigating discard dynamics across all fishing sectors.
- Conducting spatial surveys to support stock assessment and identify critical habitats throughout the Firth of Clyde.

1. **Given the key priorities for the TSP are not aimed at evaluating the effectiveness of measures to protect spawning cod, why does the Scottish Government consider it necessary to continue and extend the closure for the duration of the TSP to 2028?**

Contact: Rural Affairs and Islands Committee, The Scottish Parliament, Edinburgh, EH99 1SP.

Email: rural.committee@parliament.scot. We welcome calls through Relay UK and in BSL through Contact Scotland BSL.

Additionally, there was consensus among stakeholders attending the Committee's roundtable that there was a lack of detail provided about the aims of the TSP and how it will operate.

The Committee requests further information on the following:

- 2. the specific research questions and hypotheses the TSP will seek to address (if identified);**
- 3. an indicative timescale for each phase of the TSP (research design/stakeholder engagement, data collection, analysis, reporting and implementation);**
- 4. details of funding, staff and resources that will be allocated to ensure the Marine Directorate has capacity to implement the TSP effectively;**
- 5. details of how stakeholders will be involved in the design and implementation of the TSP;**
- 6. details of support (financial, technical or operational) that will be made available to fishers in designing, trialling and delivering the TSP and how industry knowledge will be meaningfully incorporated into the programme.**

Regarding the University of Strathclyde stock assessment research, the Scottish Government's consultation analysis states (page 74) "we consider that the bycatch data incorporated into this modelling work is the best available evidence on this issue and we have committed to working with relevant academics to help fill the current data gaps and improve the model" and "does not include potential bycatch in crab and lobster creels, and includes only very limited data on bycatch in Nephrops creels". At the Committee's roundtable session on 28 January, Dr Robin Cook said that more data will improve the accuracy of the stock assessment but it will not change the overall conclusion that cod bycatch in the Nephrops fleet is the main pressure preventing recovery of the Clyde cod stock.

- 7. Given that the Marine Directorate/Strathclyde assessment is considered the best available evidence, and indicates that Nephrops trawl bycatch is the main barrier to cod recovery, why does the Scottish Government consider that measures to reduce Nephrops bycatch are contingent on first improving understanding of creel bycatch?**
- 8. How does the proposed SSI address the best available evidence that the principal threat to cod recovery is excessive fishing mortality from bycatch, be it from trawls or creels?**
- 9. What research is Marine Directorate doing to improve selectivity in prawn fisheries? Will this be part of the TSP?**
- 10. Stakeholders at the Committee's roundtable spoke of challenges in ensuring adequate observer time on vessels. How will the Marine Directorate ensure that the TSP will be capable of monitoring cod bycatch to determine discard rates across all fishing sectors?**

The Scottish Government's consultation analysis states (page 74) "we consider that the best available evidence regarding the role of creel fishing in cod by catch is held by scientists in the Marine Directorate of the Scottish Government, including anecdotal and independently verified, qualitative data collected from a number of areas around Scotland".

11. Was this evidence provided to Marine Directorate and University of Strathclyde scientists during development of the Clyde cod stock assessment? If not, why was it not made available?

It would be helpful if you could provide this information by close of play on Wednesday 4 February in order to be included in the Committee's papers for your evidence session the following week.

Yours sincerely,



**Finlay Carson MSP
Convener**