

Sea Change Wester Ross submission of 12 August 2022

PE1951/C: Reinstate inshore coastal limit on the use of dredge and trawl fishing gears

Sea Change Wester Ross began in 2014 as a community marine thinktank. It was set up in response to the decline of the fisheries and ecosystem in the Wester Ross area. Many of us are scientists, journalists, anglers, artists, academics, fishermen and ordinary members of the community who care passionately about our seas recovery. We looked at the evidence from scientists and economists and joined together to campaign for the return of something like the 3 Mile Limit. We believe this is the bare minimum needed.

We assessed the situation with clarity – we believe there was and still is an urgent need to stop dragging metal across the seabed and to protect our inshore nurseries and spawning areas from dredge and trawl.

We witness first-hand the impoverished marine environment. The area once was the herring capital, it had vast white fish fisheries, salmon and sea trout and hosted sea angling competitions - but now sea and river anglers can hardly catch a fish for supper. We could see for ourselves the main reason why. Dredgers dragged tonnes of metal over underwater sea forests and reefs, which were once as rich as the barrier reef, for a few scallops, and trawlers are 'farming' the prawn grounds whilst damaging the seabed and catching fin-fish as bycatch, whilst also destroying recovery of the former fin-fish fisheries – which had already collapsed. It was also damaging more sustainable fishing and leading to gear conflict and climate change. Our opinion comes from well documented scientific evidence, from economists and from first-hand experience. One of our members calculated the Government's own recorded statistics on bycatch over the decades and noted the dramatic decline in bycatch as our seas were emptied after the 3 Mile Limit was lifted. This can be supplied on request.

Landings from the former three mile limit area of commercial fin fish species such as Haddock, Whiting, Hake, Saithe, Plaice etc have declined by as much as 98% since the area was first opened up to trawling.

To summarise, it is our view, backed by evidence, that:

- 1- Lifting the 3 Mile Limit led to a collapse of fin fish fisheries, (and unrecorded blackfish) and the depletion of Scotland's once rich seas.
- 2- Recovery cannot happen when the very same dredge and trawl fishery - with high levels of bycatch continue to kill vast amounts of sea life, destroy habitats and waste food.
- 3- The damage to the seabed habitats - many of them keystone species - which are nursery and spawning grounds is reckless and often without knowledge of what is being destroyed. Many keystone habitats and spawning grounds and nurseries have been ground to dust.
- 4- In a climate emergency the carbon footprint of dredge and trawl is huge. It can be solved with political will and large gains made.
- 5- The Scottish Government has failed to act because it is stuck in a constant consultation process - being used to avoid change. It is dysfunctional because there is no holistic ecosystem perspective or agency responsible for seeing the bigger picture. In our view, Marine Scotland asks the industry doing the damage for its opinion and works with it to ensure change is minimal - rather than independently thinking for the sake of the nation. Leadership is acting on evidence on behalf of the nation and future generations. The Scottish Government's policies fail to meet the definition of sustainability.

The claim that 37% of our seas are marine protected areas and therefore protected is misleading. This is because little of what is inside the MPA network is, in reality, actually protected and, worse still, this hides the truth that there have been massive losses of habitats and species over the last decade since the Marine Protected Area Network was put in place. This is documented by the Scottish Government's own 2020 assessment of the state of our seas.

A just transition by decommissioning dredge and trawl, with a firm but respectful consultation with the industry, is required. Given the years of procrastination there are now no pain free options left. Change must happen and parliamentary leadership on this needs to be a cross-party process.

We wish to see a ban on trawl and dredge in the inshore - and it is only enforceable if it is a boundary line and not a complex patchwork of rules and regulations, which no one can understand or police with such limited resources. We believe the economic value of our seas when recovered far outweighs the cost of decommissioning these archaic and damaging industries. Low impact sustainable fishing such as creel and dive fisheries can produce so much more for the communities and manage fisheries according to habitat and sensitivity. The problem, as we see it, far outweighs the requirement of the return of something like the 3 mile limit, and will require a whole ecosystem approach.

We have no commercial interests. We speak as members of the public concerned for our future.