

The Scottish Sea Angling Conservation Network

Response to the

Draft Firth of Clyde Marine Spatial Plan

June 2009

To the Chair,

The Scottish Sea Angling Conservation Network (SSACN) welcomes the opportunity to respond to the Draft Firth Of Clyde Marine Spatial Plan. Our response is primarily focussed around the needs and interests of the recreational sea angling sector though it does touch other areas where we feel there is confusion and/or we have valid input.

We are quite happy for this document to be made publicly available.

Denis Kelly - Secretary SSACN

The Scottish Sea Angling Conservation Network.

www.ssacn.org

Summary

The general impression is that there has been a tremendous amount of effort involved in putting together the many and varied documents, however, to facilitate the understanding by people less intimately involved with the various processes, it is felt that a much simplified 'Executive Summary' could have been made available for many of the documents, and especially for The Plan itself.

It is felt that having the membership of the Steering Group consist of the Firth of Clyde Forum Core Group has resulted in other interests, especially that of the recreational sector, having not been given equal attention.

There is real concern that the Proposed Action Plan whilst considering a strategy for sailing which would involve identifying / delivering the infrastructure and facilities required to enhance the sailing experience, it does not consider putting in place a similar strategy for the development of sea angling, even though sea angling contributes around £25 million/yr to the Clyde economy.

There is also tremendous concern that more focus needs to be given to plans targeted at conserving / regenerating the marine environment and that objectives of such plans should be SMART (specific, measurable, achievable, realistic and timely) to ensure meaningful measurement of their progress.

Fish stocks in the Clyde have collapsed and though not biologically extinct they are now commercially and ecologically extinct and no longer perform functional roles in the Firth of Clyde ecosystem thus making the environment less biologically complex and less resilient to environmental fluctuations.

It was felt by many that the current time-scales are insufficiently aggressive, and that by the time it is understood what should have been done, it will then be too late to do it.

From the sea anglers point of view, it is difficult to see what the SSMEI will do to address the well understood stock / infrastructure / development issues, many of which were identified as far back as 1988 in the Scottish Tourist Board initiated Clyde Sea Angling Study.

Planning

Overall we find the planning element to be the most confusing. The Plan itself envisages a more integrated approach between the many jurisdictions and aims to

- provide a means of better informing public bodies who have responsibilities for marine and coastal planning
- inform decision making and guide priorities
- seek to achieve a balance between national and local interests

Yet the Scottish Marine Bill proposes to introduce Scottish Marine Regions (SMR) and implement marine planning through a partnership comprising local stakeholders or a public authority. In order to avoid confusion and overlap there needs to be a better definition of the proposed relationships between the SMRs / SSMEI and the many bodies / functions involved in the marine environment – Integrated Coastal Zone Management (ICZM), Inshore Fisheries Groups (IFGs), The Crown Estate, SNH, Local, Regional and National governments etc., and where the legislative responsibilities lie.

We feel this is essential as the boundaries between many of them are totally different and overlapping is common, for example the boundaries of the Clyde SSMEI and IFGs are different.

If the overall goal is to increase local transparency and accountability but the above will need to be clarified, documented and communicated if that goal is to be achieved.

Key Issues.

Our members were canvassed for their opinions; the following are their key issues, gathered into logical groups, they identified when asked for feedback on The Plan :

- I cannot see anything concrete in The Plan to address the continual decline of the biodiversity, especially fish, in the Clyde.
- Within the policy context The Plan is portrayed as being at the hub of all plans, programmes and strategies, yet it is unclear how this will be achieved and where responsibility for communication to the 'outside world' will be.
- It is unclear what The Plan will bring to the area from a planning perspective given that :
 - The proposed Scottish Marine Bill appears to separate land and marine planning.
 - As a Marine Spatial Plan it has no statutory basis and contains localised plans in the form of ICZMs which again are non-statutory.
 - The planning interdependencies, interrelationships and precedences between The Plan and the plans created by other bodies such as the Clyde IFG, upcoming Scottish Marine Regions, EU directives etc have not been clearly articulated.
- It appears that in the socio-economic review the value of the recreation/tourism sector has been grossly underestimated and its overall contribution undervalued. Sea angling alone in the region is worth around £25 million/yr.
- Openness and transparency are still a major issue – ongoing communication has been poor.
- The Strategic vision for 20 years includes a 'healthy marine and coastal environment, rich in biodiversity and natural resources' but we cannot find a road map as to how the existing state will be regenerated to achieve this.
- The Plan appears to focus on sustainability and not consider regeneration
- Too much focus on the needs of the mobile nephrops sector.
- A lack of inclusion of sea angling interest as 'Potential Partners' in many of the Proposed Action Plans.
- A total lack of recognition of the true state of fish stocks in drawing up the 'State of the Clyde' – fig 38 implies a continual growth in the number of species in the Clyde ie : increasingly diverse biodiversity, it does not take account of those that have been lost. This is seen by many as a deliberate attempt to hide the true situation.
- Any operational frameworks need to be sensible, proportionate, underpinned by scientific assessment and to the benefit all stakeholders; they should also be open, inclusive and structured to meet the demands of today.
- The Plan is missing the chance to increase the revenues which underpin the economic foundations of many coastal communities by not fully recognising the needs of the marine recreational and tourism sectors.
- The Plan needs to focus more on regeneration rather than sustainable exploitation - twenty species of fish once common in Scottish waters have become so depleted in the last two decades that many are now considered locally extinct in several areas.

Background to sea angling in the Clyde

Sea angling is a selective, environmentally friendly and low-impact activity; it is the # 1 coastal recreation activity in Scotland and is of great social and economic importance - according to an economic study performed by SSACN in 2006, sea angling in the Clyde generates somewhere around **£25 million/yr in revenue** to the area.

The Clyde at one time hosted the European, UK and Scottish cod championships; the record rod caught cod was taken off the Gantocks in 1970 – that record still stands. The Clyde also used to hold the most diverse range of species in Scottish waters, with many Scottish record fish being taken from it.

Unfortunately, this all changed in 1984 when the rules regarding trawling were relaxed. Four years later its impact on sea angling had really hit and in 1988, the Scottish Tourist Board initiated the Clyde Sea Angling Study, amongst it's key findings were :

- There had been a sharp decline in demersal stocks.
- It's affect on the commercial sector was mitigated by nephrops
- There had been a sharp decline in sea angling activity
- If stocks were to be improved there would need to be a reduction / revision of commercial activity.
- The sea angling sector had a greater interest in measures which would increase stock levels and sizes than the commercial sector as measures to improve stocks could have an adverse impact on nephrops landings (a view that is current to this day with certain elements of the commercial sector)
- Employment in the sea angling sector could be enhanced with minimum impact on the commercial sector.

In the end very little was done, over 100 sea angling charter and boats for hire went out of business, a substantial number of tackle shops closed, five major festivals and many sea angling competitions and all their attendant revenues, probably in the region of £10 million/yr, were lost to the area, along with a substantial number of jobs.

It seems somewhat ironic that although sea angling delivers so much socio-economic value to the Scottish and Clyde economies, it receives so little recognition, consideration and support; especially as unlike many other sectors, sea anglers themselves make no money out of their activity

Many other countries, from Eire to Australia, have now recognised the value of sea angling and have put in place proactive measures to ensure the regeneration of depleted stocks and create the kind of infrastructure modern day anglers and their families require eg : slipways ,safe anchorages, fishing piers, camping site facilities, barbecue /picnic areas , educational events etc.

With a suitable regeneration programme the Clyde, although it may never be what it once was, could once again become a major attraction for anglers without any significant impact on stocks or general marine biodiversity.

Unless the SSMEI takes sea angling more seriously then it will fail to deliver anything for sea angling and show once again that the views and demands of the dominant commercial interests take preference over the socio-economic value delivered by an activity enjoyed by 100,000+ anglers nationally and 25,000+ anglers within a 30 mile drive of the Clyde SSMEI.