



## **The Scottish Sea Angling Conservation Network**

### **Response to the Rural Affairs and Environment Committee**

#### **Call for Evidence**

#### **Committee Stage 1 of the Marine Scotland Bill**

June 2009

*Convener,*

The Scottish Sea Angling Conservation Network (SSACN) welcomes the opportunity to attend the meeting of the Committee at Stage 1 of the Marine (Scotland) Bill, especially as we believe that the interests of the Scottish recreational sea angling sector have received less than satisfactory consideration in the past.

We are also grateful for the opportunity to make this written submission. Though we shall make some general comments relating to the Bill, we shall take this opportunity to highlight concerns and issues we have specifically relating to the impact the Bill may have on recreational sea angling.

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

*Ian Burrett – Vice Chairman SSACN*

*The Scottish Sea Angling Conservation Network.*

## ***Background***

Recreational sea angling (RSA) 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.

Scotland was once a major European sea angling centre based around species that were not readily available elsewhere in the British Isles or Europe, unfortunately many stocks have been depleted to the point where this is no longer true.

However, over 100000 anglers still regularly take part in the sport and contribute £150+ million/yr to the Scottish economy, a high percentage of which is associated with tourism.

We believe that if the relevant stocks and habitats were to be regenerated, Scotland could once again become a premier sea angling destination; this in turn would facilitate the regeneration of some of the thousands of jobs which have been lost in dependent businesses and communities.

## **Summary**

Our response is focussed primarily on Parts 2 and 4 – Marine Planning and Marine Protection and Enhancement and how consistent they are with the Government's overall strategic objectives, especially in the areas of 'Wealthier and Fairer' and 'Greener'.

Our primary concerns following discussions during the Sustainable Seas Task Force, 'roadshow' consultation meetings and the various documents are :

- That any operational frameworks are sensible, proportionate, underpinned by scientific assessment and to the benefit all stakeholders; they should be open, inclusive and structured to meet the demands of today.
- There needs to greater clarity in the make-up, membership and powers of the Scottish Marine Regions (SMRs) and a greater focus on ensuring the interests of local communities and recreational users of the marine environment are taken into account.
- Commercial, recreational, conservation, tourism bodies and communities interested in fishery resources are essentially all looking for stocks which are readily available at safe biological levels – yet all but the former are denied input to fisheries management.
- In the UK Marine Bill, their Sea Fisheries Committees have been replaced by Inshore Fisheries and Conservation Authorities with mandated membership for conservation and sea angling bodies. This should be reflected in Scotland's Marine Bill.
- The Government is missing the chance to increase the revenues which underpin the economic foundations of many coastal communities by not recognising and including the needs of the marine recreational and tourism sectors.
- The Bill 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.
- As the marine ecosystem is severely degraded in many places, Angling Regeneration Centres would offer an opportunity to combine local management, conservation and regeneration to protect and enhance biodiversity whilst increasing economic activity.
- There can be no justification for management which is not open, transparent and inclusive.

**This will require a 'sea change' to the current attitudes and practices.**

## **Part 2 - National and regional marine plans**

According to the Policy Memorandum, the Bill will provide powers for Ministers to create Scottish Marine Regions (SMR) and at a local level, implement marine planning through a partnership comprising local stakeholders or a public authority – thus increasing local transparency and accountability.

One of the major difficulties in responding to this section is that in the various presentations regarding the Marine Bill we have attended, no one has been able to clearly articulate :

- How the boundaries of SMRs will be determined.
- The specific roles of a SMR.
- The proposed relationships and legislative responsibilities between the SMRs and the many bodies / functions involved in the marine environment – Integrated Coastal Zone Management (ICZM), Scottish Sustainable Marine Environment (SSMEI), Inshore Fisheries Groups (IFGs), The Crown Estate, SNH, Local, Regional and National governments etc.

These will need to be clarified and well documented, but if the above goals are to be achieved :

- The Marine Bill should not seek to exploit our seas purely for commercial gain, it should deliver management structures which ensure its conservation and where necessary, its regeneration.
- The membership of an SMR must be representative of ALL local socio-economic activity rather than just reflecting the interests of dominant commercial activities.
- Overall 'Best Value' should be the objective.
- There will be a need for consistency, especially in areas bordered by many regional authorities and/or across national boundaries e.g.: The Clyde and The Solway.
- There should be no 'Presumption of use' in any plans, the planning system should determine what and where activities can occur taking into account all the different interests.
- There should be a mechanism to appeal on the competence of the plan itself rather than just decisions made on the basis of the plan.

All plans should be targeted at conserving / regenerating a healthy marine environment, therefore their objectives should be overarching and SMART (specific, measurable, achievable, realistic and timely) to ensure meaningful measurement of their progress.

Our experiences to date when trying to get recreational sea angling issues addressed, especially those pertaining to conservation matters, have not been very rewarding – provisions within the Bill need to ensure the SMRs take a broader view of the wider recreational, tourism, conservation and local community issues.

As expressed in the policy memorandum, Scotland has a strong coastal community, with approximately a fifth of the Scottish population living within one kilometre of the sea.

The importance of the marine environment to ALL these communities and the need to involve them in marine decision making, must be paramount; especially in our specific case, for the thousands of sea anglers as well as the businesses and communities which depend on them.

## Part 4 – Marine protection and enhancement

When considered specifically from a conservation and recreational sea angling point of view, this is the area which causes us most concern, especially as in its response to the UK Marine Bill, the Scottish Government stated:

- ‘The environmental status of most seas around Scotland is currently good or excellent’ and in this consultation it claims ‘the seas are generally healthy and biologically diverse’

This cannot be the case when three of the qualitative descriptors for determining good environmental status are :

- Biological diversity is maintained.
- Populations of all commercially exploited fish and shellfish are within safe biological limits, exhibiting a population age and size distribution that is indicative of a healthy stock.
- All elements of the marine food webs occur at normal abundance and diversity and levels capable of ensuring the long-term abundance and full reproductive capacity of the species.

and the near-shore fish stocks around our coasts have collapsed to the point where in the last two decades twenty species of fish once common in the waters around Scotland are now considered locally extinct in many areas. Protecting key habitats and species will play a vital role in improving the health of the marine environment, with this in mind the Bill should :

- Unequivocally offer protection to all critically endangered marine species on the IUCN red list and Scotland’s biodiversity strategy list.
- Propose a complete a complete science-based review of all threatened stocks every five years and an annual review of whether new marine species need to be added.

Marine Protected Areas (MPAs) can play a significant part in try to help ensure the biodiversity of our waters, but we are concerned that :

- An MPA must be science driven and have a specific purpose eg: protecting an exceptionally biologically diverse area; protecting the feeding, spawning, mating and migration sites for mobile species; protecting nationally important marine areas etc.
- The determination of an MPA should follow an open and transparent process with meaningful involvement for all communities affected in order to enable the broadest cross section of views and issues are taken into account.
- Management decisions should be based on the REAL costs and benefits (environmental, social, and economic) but be driven by conservation principles.
- The goals and objectives of an MPA must be clearly stated.
- ‘Blanket bans’ should not be introduced unless a specific goal or objective requires it.

Throughout the whole process, sustainable exploitation has seemed to be the end goal, this should not be the answer, we need to REGENERATE the biodiversity our inshore waters, this will require a ‘sea change’ in the current attitudes and approaches to the management of the COMMON RESOURCE which is the marine environment.

## **Part 4 cont'd - An Angling Regeneration MPA**

Section 58 of the Bill enables Scottish Ministers to designate MPAs on the basis of nature conservation, demonstration and research, or historic marine protected area.

One additional area which could provide a major opportunity would be to make provision for the creation of Angling Regeneration MPAs – areas where recreationally important species require protection from excessive exploitation and where the emphasis is on the regeneration of stocks through conservation and education.

An Angling Regeneration MPA would be set aside for sea angling, artisanal fishing methods and non-destructive commercial fishing practices. This would provide a safe haven for juvenile fish stocks in particular and would allow the habitats, benthic communities and fauna to recover.

Depleted fish stocks typically regenerate by two to three times within three years of protection.

The designation of this kind of MPA could be very flexible eg: it could consist of several areas within a coastal feature such as a Firth, or it could encompass the entire feature itself. It could also be part of a bigger MPA.

## **In Conclusion**

In recent years there has been a consistent demand for a change in the management of Scotland's seas that will :

- Be open, transparent, inclusive and accessible.
- Deliver better stewardship.
- Provide increased opportunities for economic growth.
- Focus on regeneration and not just sustainable exploitation
- Preserve the marine environment for future generations.

This was initially highlighted by the The Environment and Rural Development Committee (ERDC) of the Scottish Parliament following its inquiry into the Marine Environment in 2007 which identified the need for a new system of marine planning, a more integrated regulatory system for marine activities, the need for marine protected areas, further research and for a marine management organisation to simplify governance and not add to bureaucracy.

SSACN, along with other marine stakeholders, has expended a substantial amount of effort and energy in the Advisory Group on Marine and Coastal Strategy (AGMACS) and Sustainable Seas Task Force, groups which were formed to provide advice to Ministers on taking those recommendations forward.

The Government has also made a very serious investment in communicating the outcomes of those initiatives to a very broad spectrum of stakeholders.

**There is now a very high expectation amongst the 100,000+ sea anglers and a very broad range of other recreational, tourism and conservation related groups, as well as many of their dependent communities, that change will happen and that the old 'closed shop' style of marine management will be replaced by one that is more open, transparent and inclusive.**