

The Scottish Sea Angling Conservation Network



Scottish Government
Marine Strategy Division
Area G-H 93
Victoria Quay
Edinburgh
EH6 6QQ

Date: 27 September 2008

Dear Sir,

'Sustainable Seas For All' - A consultation on Scotland's first Marine Bill

The Scottish Sea Angling Conservation Network (SSACN) is a Charity registered in Scotland. SSACN is a national conservation organisation with individual, corporate and family Memberships.

We were established to lead a unified, coordinated and comprehensive approach to international, national and local conservation issues which may affect recreational sea angling in Scotland.

Recreational sea angling is a selective, environmentally friendly and low-impact fishing activity; it is the # 1 coastal recreation activity in Scotland and with over 100,000 anglers regularly taking part in the sport is of great social and economic importance.

Scotland should be a major sea angling centre based around species that are not readily available elsewhere in the British Isles or Europe, but lack of stocks through inefficient and ineffective fisheries management has left many species virtually extinct and many areas barren and fishless.

We welcome the opportunity to put forward our thoughts for the Marine Bill consultation. We appreciate the bill is essential to meet up with the changing face of marine management, particularly now the Scottish Government is starting to understand the needs of the RSA sector.

Our response concentrates on the particular areas of interest to the SSACN - we do not address all questions in this submission.

A major concern for us is that we feel the current proposals are really too vague regarding the makeup, membership and powers of the SMRs which we believe should take into account and be representative of ALL local socio-economic activity and not just reflect the interests of the dominant commercial activities.

Hopefully the legislation within the Bill will have the flexibility to meet both the opportunities and challenges for recreational sea angling development in the future and SSACN looks forward to working with the Scottish Government and Marine Scotland to secure an integrated approach to the regeneration and management of Scotland's sea angling resources.

Should you wish to discuss any particular aspect of this response, please do not hesitate to contact us.

Yours faithfully,

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Response to 'Sustainable Seas For All'

Chapter 1 - Setting the Scene

Q1. Do you agree that change is needed to the management and legislative framework for managing Scotland's seas?

Yes, but not in isolation, consistency with the rest of the UK is essential.

Q2. For each of the following areas, do you agree that Scottish Ministers/ Scottish Parliament should put in place a new legislative & management framework to deliver:

a) a new system of marine planning for the sustainable use of Scotland's seas;

Yes

b) Improvements to marine nature conservation to safeguard and protect Scotland's marine assets;

Yes; as long as these are sensible, proportionate, underpinned by scientific assessment using an eco-based management system and take socio-economic aspects into account in their designation to benefit all stakeholders.

c) a streamlined and modernised marine licensing and consents system;

d) better stewardship backed up by robust science and data;

e) a new structure, Marine Scotland, to deliver sustainable seas for all?

Yes; as long as its remit ensures an equitable balance between conservation and socio-economic issues.

Q3. What difference would these changes make to your area of interest?

The marine bill needs to recognise that fish stocks are a shared resource, and should be managed in a way that takes into account the needs of ALL with an interest.

At the moment, other than some ad-hoc occasions, there is no mechanism for recreational or conservation bodies such as us to highlight our issues or contribute our views to assist the development of Government policy.

With a particular focus on inshore waters (within 3NM) we are particularly concerned that the full effects of damaging fishing techniques upon the local community and economy are not accounted for in the current system.

We would like to see greater democracy in the allocation and management of local fishery resources and a management framework that adequately reflects the needs of the valuable recreational sea angling sector.

Q4. Scottish Ministers believe there are strong practical reasons for further discussion with the UK Government on the allocation of responsibilities around the seas of Scotland. Do you agree with this approach?

Yes - we feel that Scotland must take greater control of its marine resources and that those resources must be managed for the long term benefit of all the Scottish people and not just for short term commercial interests.

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We are concerned that neither the Scottish Marine Bill proposals nor the UK draft Marine Bill have taken sufficient account of cross-boundary issues, either between national administrations or at the 12 nautical mile limit.

The Solway Firth provides a good cross border test for current proposals; effective and consistent management will require close collaboration between the Scottish and UK governments.

See also Q10.

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Chapter 2 - Creating Stability

Firstly, a general point on ICZM - SSACN believes that coastal waters out to 3NM require special focus consideration especially when it comes to recreational and conservation issues.

In the UK Marine Bill, their Sea Fisheries Committees (SFCs) have been replaced by Inshore Fisheries and Conservation Authorities (IFCAs), this has not been reflected in Scotland's implementation of Inshore Fisheries Groups (IFGs).

Given that in the past two decades a substantial number of fish species once common in Scottish waters have had their stocks depleted to the point where in many areas they may be considered locally extinct, we are particularly opposed to the formation of Inshore Fisheries Groups (IFGs).

In the Sustainable Seas Task Force workshops and during the consultation phases the Government has consistently demanded the further devolution of marine powers from Westminster.

The management of the commercial exploitation of a PUBLIC COMMON RESOURCE should be an open and transparent process yet the membership of IFGs is being restricted solely to the commercial operators with no form of process or platform for any other interests.

It is impossible to divorce commercial species exploitation from its broader commercial and conservation contexts without alienating those interests and the communities which depend on them.

To that end, a single government organisation should be identified to represent the needs of the recreational sector at the national level as soon as possible.

Q5 Do you agree with the overall 3-tier approach to marine planning in Scotland?

In principle yes, however, we feel much of the detail is ill-defined or un-confirmed.

Q6 Do you have any comments on the proposals for a National Marine Plan and the role of Marine Scotland in relation to planning at the Scotland level?

It will need to take into account the interests of local stakeholders and communities giving them a realistic opportunity to determine the usage of the local marine environment.

Q7 Do you have any comments on the approach to setting out the national objectives for marine planning?

There have been many consultation events held around Scotland but expectations have not been well managed.

For example, many people/groups now consider themselves to be stakeholders and integral to the approach - the process by which, if at all, they can continue to be involved has not been clearly or adequately articulated.

Q8 Do you agree with the overall approach to planning at the international level beyond Scotland? Do you have any further suggestions or comments to add to the proposed approach, in particular on the UK high level objectives?

Yes - but once again a priority would be to ensure a high level of consistency with the high level objectives for the whole of the UK's marine and coastal resources and that an effective process is put in place to address issues that cross regional or administrative boundaries.

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Q9 Should Scottish Ministers use the Marine Planning system to deliver Scotland's obligations under the Marine Strategy Framework Directive?

We feel we cannot effectively respond to this question because as far as we are aware the precise obligations of Scotland under the Marine Strategy Framework Directive have yet to be determined.

Q10 Do you agree with the overall approach and functions for Scottish Marine Regions? Do you have any other comments on the proposed approach to planning at a regional level?

We feel the current proposals are too vague for really meaningful comment.

However, we feel that consistency across regional boundaries will be a key issue especially in areas bordered by numerous regional authorities or across national boundaries.

The membership and the remit of each SMR will need to take account of and be representative of ALL local socio-economic activity and not just reflect the interests of the dominant commercial activities.

Q11 Do you agree that the Scottish Marine Regions should be responsible for Integrated Coastal Zone Management?

Yes - Scottish Marine Regions and all relevant Scottish public bodies should have a duty to deliver ICZM but they should also have a duty to ensure that all socio-economic interests are given equal opportunity to contribute; planning a common resource should not be limited to commercial interests.

Q12 Do you agree that Scottish Ministers should place a duty on Scottish Marine Regions to adopt the eight principles of Integrated Coastal Zone Management?

Yes.

Q13 Do you have any other comments on the delivery of Integrated Coastal Zone Management alongside marine planning?

ICZM needs to deliver for the common good and should reflect the wishes of the local population, in order that sight will not be lost of social and recreational needs and that it may be achieved in an open and transparent manner and we believe the coastal zone requires greater consideration in it's own right and that a vehicle is determined by which the voice of smaller bodies is not lost in the clamour.

We feel that by establishing IFG's the Scottish Government will itself be in breach of the 8 principles of ICZM unless the role of the IFGs is confined to regulating gear conflicts.

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Chapter 3 - Reducing the Burden

▪ Licensing & Enforcement

Q.14 Does licensing remain an effective method of delivering both certainty for investment purposes, and protection for the marine environment?

Any system of licensing should be both effective and proportionate to the circumstances involved.

Q.15 The existing licensing system covers most of the impacts on the seas from existing activities. One area of activity that has potentially large impacts and is not licensed is dredging. Scottish Ministers propose to license all new forms of dredging (i.e. those forms that agitate the sea bed). Do you agree? Are there other activities that should be licensed?

Q.16 Scottish Ministers intend to create powers to set out a list of licensable activities in regulations. Do you have any views on this approach?

Q.17 The proposed Marine Scotland should have general responsibility for the delivery of the marine licensing system. Do you agree?

There should be no licensing without representation.

All licences should be the subject of an environmental impact assessment with the burden of proof of minimal environmental impact resting on those commercially exploiting a resource.

Q.18 Scottish Ministers intend to reduce the numbers of marine licences that developers require to get before an activity can take place. There are two ways to reduce the numbers of licences; either by creating a single licence for all marine impacts or by creating a single licence for each activity. Which system do you prefer?

Q.19 Marine Scotland could undertake the licence work itself or operate as a front door co-ordinating the work of others. Do you have any views on these options?

Q.20 Do you agree with the proposed approach to consultation, involving local stakeholders? Do you have any further comments?

We would very much welcome further local accountability but once again question how that will work, if for example, local fisheries issues are to be restricted to IFGs which have no outside representation and no local accountability.

Q.21 Do you agree that the revised licensing system should incorporate the simplified CAR model throughout, to focus scrutiny on higher risk activities/impacts and reduce the regulatory burden?

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Q.22 Scottish Ministers intend to provide Marine Scotland with powers to insert conditions into licences. Do you agree with this approach? In particular, Scottish Ministers intend to create a standard condition in removal of redundant kit and installations: do you agree?

Yes, subject to those conditions being proportionate and justified by evidence

Q.23 Scottish Ministers believe an appeals procedure for those directly involved in the licence application would be a beneficial development. Do you agree?

Yes.

Q.24 To provide an easy and transparent system, do you agree that a scale of charges related to cost recovery is the most appropriate way to recover the costs of assessing, issuing, monitoring and enforcing licences?

There should be clear and transparent justification for any charges imposed and they should be based on detailed cost recovery without any additional revenue element.

Q.25 The Scottish Government proposes a review of existing licence monitoring and enforcement provisions relating to the marine environment and wishes to consolidate them into a single set of coherent powers and remedies. Marine Scotland should be tasked with ensuring compliance monitoring and enforcement activity is carried out consistently and efficiently. Do you agree?

Enforcement also needs to be carried out effectively which is not the situation right now, to facilitate this Marine Scotland will need to be granted the appropriate powers and functions by the Scottish Government along with an appropriate budget.

Q.26 Please provide any further comments you have on the licensing provisions in the consultation paper.



CHAPTER 4 - SECURING THE FUTURE: NATURE CONSERVATION

With specific regard to the species of interest to sea anglers :

Some species are valued equally by both the commercial and recreational sector, whilst others are of value to only one sector. Although the two values are difficult to compare the value placed on a single fish changes depending on whether it is being targeted commercially or recreationally.

Fisheries management decisions need to be based on the costs and benefits (environmental, social, and economic) but driven by conservation principles. The characteristics of each stock are, in part, dependent on how it is being targeted - the number, size and age of fish being removed.

Fisheries management decisions need to take account of all these factors, and more emphasis should be placed on socio-economic factors in management decisions. The ability to take account of socio-economic factors will therefore need to be built into the management framework.

Some traditionally "angler only" species like wrasse, conger and pollack are of more value to the recreational sector than commercial sector.

The value in reserving some species for recreational use only should be considered. Management plans need to be able to set specific measures to enhance the stock to maximise angling opportunities.

Q27 Do you agree that our system of marine nature conservation should be based on the three pillar approach?

Yes

Q28 Please provide your views or comments on the application of Marine Ecosystem Objectives for marine nature conservation.

We would like to see control areas introduced - these should be aimed at monitoring their development / regeneration rather than to address any specific flora and fauna.

Q29 Do you agree it would be worthwhile to have a biodiversity duty in the offshore area around Scotland?

Yes

Just as we have had to secure land-based conservation by means of nature reserves and national parks, we need to do the same in the marine environment and even more so because it is so much more interconnected within it.

Q30 Do you have any other suggestions for making improvements to Pillar I - wider seas measures?

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Q31 Do you agree with the proposals for a science-based review of whether new marine species need to be added to the existing list of protected species?

Yes but adding species to a list does little to protect them especially given Scotland's past and current record regarding the protection of species which have already been determined to be at risk. The bill must make a commitment to act on the science based review and offer immediate protection to those critically endangered marine species listed on the IUCN's red list and on Scotland's biodiversity strategy list.

The Scottish Biodiversity Strategy's first stated objective is "to halt the loss of biodiversity and continue to reverse previous losses through targeted action for species and habitats." Despite scientific advice no protection has been offered to these key species and particularly the elasmobranchs.

Q32 Do you have any further comments or suggestions for making improvements to Pillar II - species conservation?

Species conservation measures should not be limited to threatened or endangered species.

The sea angling sector should be involved in Scotland's plans to introduce Marine Protected Areas (MPAs), including the delivery of the Natura 2000 network and plans to introduce Marine Conservation Zones by 2012 to ensure that their interests are fully represented in the design and designation of these areas.

Depending on the management objectives for each MPA, there should be scope for some areas to become effectively 'angling only'. These might include sea lochs and bays, estuaries, wrecks or beach marks; these could be in key sensitive areas for the protection of endangered species.

Q33 Do you agree with the overall principle of the introduction of a power to select new types of site?

Yes, providing it incorporates an open and transparent process which puts the interests of the site before commercial concerns and where the goals and objectives are clearly stated - we do not support 'blanket bans' unless a specific goal or objective requires it.

Q34 Do you agree with the assessment of the three main types of requirements for site protection? Do you have any further comments on this?

Meaningful involvement for communities is essential for the acceptance of environmental protection and enforcement. It will also enable those communities to position themselves to achieve the maximum local benefit that may accrue.

Q35 Do you have any views on whether or not a "single approach" should be taken for marine historic and natural environment site protection?

Q36 Do you agree with the proposals on how a new flexible site protection power will be used? Do you have any other comments?

An acceptable process for dealing with applications for marine protection will need to be open and transparent; there will need to be readily identifiable officers to deal with the application, clear timescales for consultation and decision making and a suitable appeals process.

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Q37 Do you have any views or comments on whether a single integrated power should be used to deliver these proposals?

This cannot be answered without any definition of the processes involved.

Q38 Do you agree with the proposals for how sites will be managed, including the site by site approach and overall context of sustainable development?

Do you have any additional comments?

There is a need to go beyond sustainable and concentrate on regeneration - make Scotland's marine environment closer to the rich and diverse entity it was once before.

We need to start now to remove economic pressure from chosen areas of seabed which are known to be nursery or rich feeding sites to enable fish and shellfish to grow to maturity.

Q39 Please provide us with your views on the role that a wider planning system should have in the identification of Marine Protected Areas?

Whilst SSACN fully support MPA's, we believe the target goals should be specific and blanket bans should only be implemented to achieve specific targets.

We regard it as vital that in the identification and creation of new MPAs an open and inclusive process is followed to enable the broadest cross section of views including socio-economic issues to be taken into account with no single entity having any 'superior' claim.

MPA's though will not be the whole answer - pressure on fishing policies, practices, capacity and discriminatory gear will have to be stepped up with the introduction of more scientific processes to establish the REAL situation regarding stocks and the marine environment.

Q40 Do you have any other comments or suggestions for making improvements to Pillar III - site protection?

Pillar 3 is insufficiently defined at the moment for any meaningful response.

Q41 Would you agree with the principle that the offence against damage to Natura sites should apply to marine sites? What are your views on whether a similar offence should be introduced for damage to other Marine Protected Areas?

Agree

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Q42 How can we enhance the contribution which the wild marine environment makes to Scotland's economy?

As a result of inadequate fisheries policies and practices combined with ineffective fisheries management, many of our inshore species are now virtually extinct and the seabed in many areas, barren and fishless.

A healthy and diverse marine environment must be the main priority.

This can only be achieved by thinking outside the box of direct commercial exploitation and by including recreational and conservation representatives in the decision making and management processes and investing in their promotion.

More specifically with regard to recreational sea angling -

In the 1970s, following the efforts of the government departments we would now call SportScotland and VisitScotland, along with recreational sea angling bodies, Scotland became a key destination for Scottish, UK and European sea anglers.

This growth was predicated on the diversity and availability of the fish in our inshore waters, many of which were not readily accessible anywhere else in Europe.

Indeed, at one time, the Clyde area used to host many major fishing festivals, such as that at Lamlash on Arran and indeed both the World and the UK Cod Championships were once fished for in the Clyde.

Recreational sea angling is a key contributor to the economies of many local coastal communities, in fact for some; it is their principle source of employment and revenue.

Unfortunately, the contribution is in decline as a result of the state of fish stocks, for example, the Isle of Arran now loses £2 million + /yr due to the loss of that sector of the tourist industry, Scotland Plc perhaps £15 million +.

- Government, recreational and commercial fishermen and scientists need to work together towards conserving the many species of interest to anglers so that angling and all the industries and coastal communities associated with it can thrive.
- Increase awareness and understanding of Scottish recreational sea angling potential, both within and outside the sector, through improved communication, education and increased participation in fisheries management
- Realise the value placed on a single fish changes depending on whether it is being targeted commercially or recreationally. For many of the inshore species, there is a far greater potential for social and economic value if the management objectives were to be aligned to produce a 'product' that would benefit the development of the valuable recreational sea angling sector.
- Consider specific areas - Angling Regeneration Centres - with a view to limiting any destructive commercial activity or reserving them for angling use only.
- The Bill should allow for the provision of artificial reefs and similar fish aggregation areas. These are man-made underwater structures, typically built for the purpose of promoting marine life in areas of generally featureless bottom.
- Recognise that a totally different emphasis needs to be placed on recreational fisheries management; as commercial management, produces lots of marketable size fish whereas sea anglers require stocks that reflect a natural size range.
- As the Marine Directorate do not see recreational sea angling as within their remit, a single government organisation should be identified to represent the needs of the recreational sector.

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CHAPTER 5 - UNDERSTANDING OUR SEAS: SCIENCE AND DATA

Q44 Do you agree that Scottish Ministers should develop a marine science strategy to focus marine scientific effort, integrate socio-economic considerations and to create a framework for wider stakeholder input?

Yes and such a framework from a recreational sea angling point of view should:

- Promote best environmental practice across all groups.
- Enables the recreational sea angling sector to be directly involved in decision making.
- Consider the impact upon Recreational Sea Fisheries and contain an obligation to consider options which could enhance the Recreational Sea Fishery.
- Will need to recognise that a totally different emphasis needs to be placed on recreational fisheries management compared to commercial fisheries management

Q45 Do you have views on how to integrate scientific evidence with stakeholder and local knowledge?

There are in excess of 100,000 recreational sea anglers in Scotland; they can not only act as 'first points of awareness' for pollution and such like, but if suitably encouraged, could also provide regular data regarding the species being taken in inshore waters.

Typical of this is the evidence from many anglers which suggests that the Lochs Sunnart and Etive and surrounding waters have a unique resident breeding population which is in danger of collapsing due to overfishing in Scottish waters and which is in need of stronger conservation measures as they are exceptionally slow-growing and vulnerable.

SSACN are currently undertaking an initial Spurdog Tagging Programme to determine the nature of those stocks and an extended programme to build on this is being planned with the Government's marine scientists at the Fisheries Research Services (FRS) providing we can raise the necessary £25,000 to pay for tags and satellite time - funding which the Government is unable to commit.

SSACN believe the Scottish Government could provide real leadership by setting aside this area to provide a springboard for the regeneration of the species.

Q46 What do you think are the potential priorities for further work?

As stated elsewhere, over the last two decades, 20 species of fish which were once common in Scotland's inshore waters may now be considered locally extinct in many areas; additionally, due to destructive commercial exploitation methods, huge areas of the seabed are now vast featureless and fishless 'deserts'.

The absolute priority must therefore be the REGENERATION of inshore marine biodiversity.

This may require a combination of approaches with specific areas to be set aside to address specific species and/or a simple proportion of the marine environment being set aside; the latter obviating the need for time consuming detailed analysis as it could be set as a simple proportion of Scottish seas.

We would support a figure of 20% as recommended by the Royal Commission on Environmental Pollution in their report Turning the Tide.

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Q47 Scottish Ministers propose that the strategic role for the monitoring and assessment of Scotland's seas lies with Marine Scotland, do you agree?

Yes

Once again - all assessments and methodologies should be open, transparent and based on the best available scientific data and methods.

Q48 Scottish Ministers propose to instruct Marine Scotland to take forward the development of GIS as a matter of priority. Do you agree?

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Chapter 6 - Managing our Seas

▪ Marine Scotland

Q.49 Scottish Ministers propose to develop Marine Scotland to champion the seas and their use and to provide better integrated and streamlined delivery in the marine area. Do you agree?

Throughout the public consultation process the creation of Marine Scotland has been effectively a given with no alternative model proposed.

Q.50 Scottish Ministers propose that Marine Scotland delivers the marine planning proposals as set out in Chapter 2. What are your views on this proposal?

We believe that there is still substantial work required to identify the functions of Marine Scotland, its relationships with other local, regional and UK national bodies and the processes by which the input from local stakeholders may be heard.

As there is a substantial disconnect in the roles of the current respective agencies a single central function is necessary to ensure a consistency of approach..

Q.51 Do you agree with the approach set out for fisheries and aquaculture management? Do you have any further comments in connection with this approach?

It makes sense to incorporate fisheries management into a marine management organisation in the interests of integration and sustainable management of the resource.

However, there must be a platform or process by which the requirements and interests of the conservation and recreational sectors can be heard and given real consideration.

As previously mentioned, in the UK Marine Bill, their Sea Fisheries Committees (SFCs) have been replaced by Inshore Fisheries and Conservation Authorities (IFCAs), this has not been reflected in Scotland's implementation of Inshore Fisheries Groups (IFGs) and without any alternative national forum it gives rise to concerns how the views of conservation and recreational angling stakeholders will be adequately represented / considered?

Q.52 What are your views on the arguments relating to where control for aquaculture should lie?

We feel it essential that any control is managed by those with an understanding of the marine environment and that that body include local stakeholders.

Q.53 Do you have any views on the role that FRS should take?

We echo the comment of the Royal Yachting Association (RYA) - "it is advisable to separate regulatory activities from the provision of independent scientific evidence."

At present there are several fish species which have IUCN 'critically endangered' status but which are still commercially exploited in Scottish waters.

Q.54 What are your views on the creation of Marine Scotland and the proposed range of functions it should deliver?

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Q.55 Do you have any views on the development of Marine Scotland's functions over time?

At all times the functions of Marine Scotland should be open and transparent – any development should be based around a long-term clearly articulated strategy focussing on the regeneration and sustainable use of resources according to independent scientific criteria; equal access to any common resource; local inclusion in determining plans.

Q.56 Ministers believe Marine Scotland should form part of Scottish Government with appropriate safeguards for science and the appeals process. Do you have any views?

It is very difficult to respond to this question with no knowledge of what the 'appropriate safeguards' may be.

Our experiences to date when trying to get recreational sea angling issues addressed, especially those pertaining to conservation matters, have not been very rewarding - the Marine Directorate especially have shown us that they have no real interest outside the commercial sector.

We are concerned that Marine Scotland will follow a similar vein and that there will be no department, process, platform or forum in place to address and give equal consideration to the issues and concerns of the recreational and conservation sectors.

With that in mind we feel that Marine Scotland should be headed by a Minister with direct accountability and independent of 'user' ministries and government marine departments.

Q.57 Are there any other aspects of the proposals in this consultation document on which you wish to add your views?

We are very concerned about the lack of recognition of the true state of the seas around Scotland. 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 of course is untrue when one considers the state of our inshore waters.

Fish stocks around our coasts have collapsed and many environments have been reduced due to destructive forms of commercial exploitation. This continues even now in the Clyde where fishing down the food chain has resulted in shellfish being the only remaining viable fishery - unless there is immediate action, these stocks too will become depleted and there will be little left for either commercial or recreational fishermen.

Sustainable exploitation is NOT the answer, we need to REGENERATE the biodiversity our inshore waters, even at the cost of some short term pain to certain interests; after all, many of the tourism businesses and others dependent on the quality of our inshore marine environment have been feeling the pain for many years as a result of the continual decline.

This Bill can only be considered useful if it is to bring around a 'sea change' in the attitudes towards open and transparent management of the COMMON RESOURCE which is the marine environment combined with meaningful inclusion of all stakeholders and not just limited to those directly interested in exploiting it.

Without such a change, nothing will change, inshore biodiversity will continue to collapse and the statement 'the seas are generally healthy and biologically diverse' will only be true of the micro-organisms it contains.