



The Scottish Sea Angling Conservation Network (SSACN) welcomes the opportunity to pass comment on the Clyde Regulating Order (RO) Application.

SSACN suggests the proposed measures, while not perfect, are an important step forward in delivering a healthy, biodiverse Clyde supporting a diversity of marine jobs rather than a vulnerable monoculture benefiting only a few.

Without regulated management, we believe there is little future for the Clyde unless all stakeholders are involved in working together towards the EU Marine Strategy Framework Directive (MSFD), which calls for Good Environmental Status by 2020 and insists governments protect the resource base upon which marine-related economic and social activities depend.

The RO reflects Cabinet Secretary Lochhead's statement that 'Scotland's seas are not owned by any one individual or vested interest. Clearly, the Clyde hasn't been managed for the benefit of all stakeholders.

The Clyde was once considered the Mecca of European Sea angling with competitions attracting 2000 entries with many from overseas. An almost century long trawling ban was lifted in 1984 and the stocks depleted so quickly that the last major angling festival ceased in 1988 due to lack of fish.

1000's of jobs were lost as over 100 charter boats went out of business, tackle shops closed and allied service industries such as accommodation, food, etc. were hit equally hard – all this in turn had a major impact on the fragile economies of Clyde coastal communities.

The RO should allow a more mixed fishery to develop and in the longer term, enable the Clyde to regain its former status as one of Scotland's most productive sea angling waters. Taking into account the outcomes of a number of economic studies relating to the Clyde, which have been undertaken in recent years, we would expect the additional expenditure from sea angling activities to generate an additional £8.2 million (Scot Gov's "Economic impact of RSA") of annual household income in under 10 years with single digit increases thereafter.

This level of increased expenditure will be sufficient to support an additional 160 jobs (rounded) in the leisure and tourism sectors in the same period and with proportional increases thereafter.

MANAGEMENT

Whilst SSACN wholeheartedly agrees a fairly represented board can put local interests at the heart of its decision making and therefor encourage the best stewardship of the fishery; we fail to agree with the suggested make up off the CSMO board.

We support the idea that management decisions should be made in the interests of local communities but how can this be possible when leisure activities and particularly sea angling interests are not represented.



We would like to see the management board made up on similar lines to the Inshore Fisheries and Conservation Authorities (IFCA's) which are tasked with the sustainable management of inshore sea fisheries resources in their local area.

They are made up of representatives from across the different sectors that use, or are knowledgeable about the inshore marine area, such as commercial and recreational anglers, environmental groups and marine researchers, who offer their time voluntarily. It is a system that works well.

DISCARD BAN

With the recent EU, discard ban it is even more important to regulate the Clyde fisheries. The effect on the diversity of fish stocks by Nephrop/Langoustine fishing within the Clyde is well documented. A well balanced ecosystem with many species has been reduced to just a few species. Only time will tell what the effect of the discard ban will be in the Clyde, but only a regulated fishery will be able to monitor the effect and take any appropriate steps to halt any further loss of biodiversity.

GRID REPORT

We started this document by saying we believe the RO proposal is a step in the right direction. The GRID report; "Management of The Scottish Inshore Fisheries; Assessing The Options for Change" outlines that the economic benefits derived from the leisure industries would far exceed the benefits from restricting mobile gear to 0- 1 nautical miles (NM) and 0-3 NM from the high water mark..

We urge Marine Scotland to consider the costs and the benefits to all sectors when it carries out an economic study on the effects of the RO unlike the biased economic case in the Luce Bay SAC consultation which only considered the interests of the dredgers as it:

- a) Assumed that the scallopers will not go elsewhere
- b) Ignored the likelihood of take up by creelers and divers
- c) Ignored the evidence of general recovery resulting from protected areas
- d) Ignored benefits to Sea Anglers and Divers
- e) Ignored the wishes of the public in general.

Because of the findings of the GRID report and other economic studies, SSACN believe all mobile gear in the Clyde should be restricted to 3 NM from the high water mark.

THE NEED FOR CHANGE

The present management policy for the Clyde is clearly a failed policy. The number of working boats, the biodiversity and the wider Clyde ecosystem are in a state of decline.

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The evidence is strong that overfishing has altered the mix of species in the Clyde, leading to the decline in fish landings (McIntyre et al, 2012) and the excessive use of heavy fishing gear, particularly on complex areas of the seabed has exacerbated this decline (Bergmann et al, 2002).

We are aware that the industry has made some unsubstantiated claims about the effects the RO would have on their livelihoods but we ask that the real interests of Scottish coastal communities are considered.

SSACN appreciate the opportunity to provide preliminary comments on the Clyde Regulating Order proposals at this stage. However, SSACN expects Marine Scotland will put the proposals out to full and formal public consultation so that all parties can provide more comprehensive comments on the proposals. It would be hoped that, like SSACN, other interested parties would be prepared to engage positively and collaboratively in such a formal consultative process. At the time of writing, the Regulating Order proposal is the only coherent plan proposed for the Clyde fisheries, and as such, it would be unsatisfactory if the proposal was not allowed to continue to the next stage.