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Members of the Rural Affairs and Islands Committee,
Scottish Parliament.

4th February 2025

Dear Members of the Rural Affairs and Islands Committee,

Scottish Environment LINK welcomes the Committee's consideration of the Scottish Government's **call for evidence on [Inshore Fisheries Management Improvement](#)** on 5th February and would like to offer our perspective ahead of that session. LINK members agree that the scope of the call for evidence is limited and does not acknowledge some of the wider issues affecting the sustainability of Scotland's inshore fisheries. We believe the call for evidence represents a backward step for progress on sustainable inshore fisheries management. The commitment in the former Bute House Agreement to cap inshore fishing activity was at least a clear proposal that could have made a positive contribution to sustainable management of the inshore. However, this commitment has been withdrawn with the collapse of the Agreement, and the call for evidence lacks any alternative specific proposals.

The importance of sustainable fishing to help enhance the marine environment

The Scottish Government recognises that [Scotland's Marine Assessment \(2020\)](#) underlines the many concerns regarding the ecological health of Scotland's inshore waters and that, through the following documents, acknowledged that there is a need to reduce pressure from fishing on marine ecosystems to help enable their recovery: the Scottish Biodiversity Strategy, the [Future Fisheries Management Strategy](#) (and the [process](#) that informed it) and in the former Bute House Agreement commitment to implement "*a cap to fishing activity in inshore waters...that will limit activity to current levels and set a ceiling from which activities that disrupt the seabed can be reduced in the light of evidence as it becomes available...to protect inshore marine habitats*". The concern regarding the environmental status of Scotland's seas and the importance of sustainably managing fishing to contribute to ocean recovery has been well documented elsewhere, including in our response to the [Future Fisheries Management discussion](#).

As our members stated in response to a Scottish Government consultation on [Future Catching Policy](#) "We believe a comprehensive and transparent review should be undertaken of Scotland's fishing capacity in relation to fishing opportunities. As required under the sustainability objective of the Fisheries Act fleet capacity must be such that it is economically viable but does not overexploit marine stocks. This is a vital consideration - if the fleet is not capable of operating within



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environmental limits it will fundamentally undermine the ability to deliver sustainable management.”

Fisheries governance reform

The IFMI call for evidence focuses on the governance of fisheries management and potential options for transitioning to a regional governance structure. LINK members are supportive of such an approach, as set out in our [Ocean Recovery Plan](#), and a new governance structure should be representative of all fishing sectors, marine interests and communities. The Convention of Biological Diversity [principles on the Ecosystem Approach](#) state that: “Decentralised systems may lead to greater efficiency, effectiveness and equity. Management should involve all stakeholders and balance local interests with the wider public interest. The closer management is to the ecosystem, the greater the responsibility, ownership, accountability, participation, and use of local knowledge”. Future governance must be ecosystem-based and address the existing gaps between Inshore Fisheries Groups (IFGs) and regional marine planning.

The Scottish Government must listen to all stakeholders to inform local fisheries management decisions. Communities must be meaningfully involved in shaping the future of inshore fisheries management, ensuring a governance framework that is both effective and inclusive. In the Future Fisheries Management Strategy’s 12-point plan, point 11 emphasises working with stakeholders to deliver an ecosystem-based approach to management. Any governance reforms must deliver on this commitment, and we would encourage the committee to look at the governance arrangements for Inshore Fisheries and Conservation Authorities (IFCAs) in England.

As we said in response to the [Future Fisheries Management consultation](#), “We support proposals for strengthening IFGs, including extending to 12nm which would improve integration with regional marine planning, provided they are adequately resourced and there is improved representation for all stakeholders. The English IFCAs are a valuable model, fulfilling many aims of the co-management agenda, with one study highlighting that 12 stakeholder groups were members of IFCA Committees or Boards compared to only two (mobile and static commercial fishing) for Scotland’s IFGs. A new local inshore fisheries management arrangement could at least be partly funded through cost recovery programmes or mechanisms.”

Spatial management

One of the key issues that remains unresolved in the IFMI call for evidence, and more generally in marine policy, is spatial management. It would be helpful to understand the rationale behind excluding spatial management from the IMFI call for evidence, as this is a fundamental aspect of fisheries management.

With persistent delays to establishing essential marine protected area (MPA) fisheries management measures now extending beyond eight years, progress on spatial measures to meet MPA site objectives and improve protection for vulnerable Priority Marine Features (PMFs) outside the MPA network is slow. The Future Fisheries Management Strategy 12 point action plan also states that “WE WILL work with our stakeholders to deliver an ecosystem-based approach to management, including considering additional protections for spawning and juvenile congregation areas and restricting



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fishing activity or prohibiting fishing for species which are integral components of the marine food web, such as sandeels.” We welcome the Scottish Government proposal to ban sandeel fishing in Scottish waters, but a spatial approach to managing fishing is urgently needed to protect important “spawning and juvenile” aggregations for other commercial fish and shellfish species. Studies have shown that vulnerable marine habitats are also important areas for commercial species, with maerl and maerl gravel being important for king scallop and juvenile cod and burrowed mud communities for langoustine and whiting for example. Our current inshore fisheries management regime does not accurately recognise nor reflect this, to the detriment of both habitats and commercial species.

The Future Fisheries Management Strategy states that: *“Our fisheries management also sits within the broad framework of Scotland's National Marine Plan which sets out the Scottish Government's approach to managing Scotland's seas, including the interactions between different sectors, their combined impact on the marine environment and the factors which influence our decision making”* and, in relation to the National Marine Plan: *“We recognise the need for a clear policy framework that reflects our new shared priorities and commitments and helps guide decision-making in cases where there may be conflict between different interests.”* Yet, the Cabinet Secretary Gillian Martin MSP recently stated on Parliamentary record that fisheries management is not a matter for marine planning in her response to written question [S6W-32232](#). LINK members believe it is critical fisheries is addressed in NMP2 and would like to know the reasons behind this decision.

Section 12(3) of The Marine (Scotland) Act 2010 requires representation from environmental, recreational and commercial representatives on any established Regional Marine Planning Partnerships. If fisheries is not a matter for marine planning, a view which we disagree with, a critical question for the committee then arises: how will inshore fisheries management in Scotland adequately consider the views of local environmental and recreational organisations.

Reform of inshore fisheries management must help deliver an inshore low impact zone, comprising no-take zones, static only zones, MPAs, and where higher risk activities like scallop dredging are only allowed and derogations applied in those areas, for example deeper and more mobile habitats, if carrying out the activity there can be proven to be sustainable, in line with longstanding recommendations to all UK administrations on managing the scallop industry. [Scientific recommendations](#) in relation to scallop dredging recommend that 3 nautical miles would be reasonable for such a low impact zone.

LINK members would appreciate understanding why the Scottish Government think Scotland is struggling to meet national and international commitments, including on delivering an ecologically coherent network of MPAs, securing sustainable fisheries and meeting Good Environmental Status. Ecosystem-based spatial management must be addressed in Scottish inshore fisheries and delivered by properly constituted regional fisheries authorities to safeguard inshore marine ecosystems and the services they provide, upon which coastal economies depend. As part of an ecosystem-based approach, Fisheries Management Plans (FMPs) must be developed that account for all commercial stocks, including scallops for which there is currently no Scottish Government commitment to develop a FMP, the inshore fleet must be fully documented using Remote Electronic Monitoring (REM) with cameras, and low impact, sustainable practice should be incentivised to support a just



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transition to a sustainable, climate-smart and nature-friendly fishing fleet. Some of our members are involved in work exploring what a just transition would involve and would be happy to discuss with committee members.

Please do not hesitate to contact me if you would like to discuss these matters further.

Yours sincerely,



Calum Duncan

Convenor, Scottish Environment LINK Marine Group
Head of Policy and Advocacy, Marine Conservation Society

This letter is supported by:
Marine Conservation Society
National Trust for Scotland
RSPB Scotland
Scottish Seabird Centre
Scottish Wildlife Trust
Whale and Dolphin Conservation
Young Sea Changers Scotland

For further information, please contact:

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