



Inshore Fisheries Management Improvement Programme: Call for evidence

February 2025

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This response was written by LINK's Marine Group.

1. What is your role in relation to the commercial inshore fisheries sector in Scotland? Please select one:

Science & academia

Inshore commercial fisher

National fishers' representative

Regional fishers' representative

Seafood processing / other ancillary seafood sector

Coastal community group

Environmental Non-Governmental Organisation (eNGO)

Public sector

Other (For example, hobby fisher).

2. Of the six Regional Inshore Fisheries Groups, which one are you most closely associated with geographically?

South West Coast - Ardnamurchan Point to the national border with England in the Solway Firth, including Inner Hebrides south of Ardnamurchan.

North West Coast - Cape Wrath in the north to Ardnamurchan Point, including Inner Hebrides north of Ardnamurchan.

Outer Hebrides - from the baseline between the Butt of Lewis and Barra Head, as well as the sea out from St Kilda, the Flannan Isles, North Rona and Sula Sgeir.

North and East Coast - Durness on the north coast and all of the east coast down to Burnmouth close to the border with England.



Orkney - Orkney, extending out to 12 miles around the isles and the waters surrounding Sule Skerry to the west.

Shetland

None (i.e. a national body)

Part 2 - Current inshore fisheries management in Scotland

For the following questions, please supply evidence or information that supports your answers where possible.

3. What works well with the current national approach to inshore fisheries management in Scotland?

There is a relatively good foundation for fisheries and/or marine conservation legislation and policy provision to implement robust measures to improve the sustainability of fisheries and the marine environment, including:

- the UK Fisheries Act 2020, with clear objectives for enabling sustainability, an ecosystem-based approach to fisheries management, and national benefit to social and economic needs;
- the UK Marine Strategy Regulations to enable achievement of Good Environmental Status in UK seas, including for commercial fish and shellfish and for seafloor integrity, and which links directly to the ecosystem objective of the UK Fisheries Act 2020;
- The Marine and Coastal Access Act (2009) and the Marine (Scotland) Act 2010, which sets out key policy provisions for protection of Priority Marine Features and for the management of fishing activities.

The ambition of the Scottish Government on the progress towards improved sustainability is also positive, such as through Scotland's Fisheries Management Strategy. LINK members also support the Scottish Government's goals for developing co-management of fisheries, for sustainable blue foods and for thriving coastal communities and livelihoods¹. By 2030, LINK members want to see that:

- Scotland's seas are beyond Good Environmental Status (GES); ecological decline is halted, marine ecosystems are recovering, a climate and nature positive fishing framework is in place and seas and coasts are clean and pollution free.
- A clear and credible pathway for ocean recovery with at least 30% of Scotland's seas properly protected from extractive and destructive activities, and areas identified for strict protection with local community support to safeguard ecosystem services, boost marine life, and protect blue carbon stores.
- The National Marine Plan and 11 Regional Marine Plans drive the restoration of marine ecosystems throughout Scotland's marine area, ensuring all human activities operate within environmental limits and are robustly monitored.

¹ <https://www.gov.scot/publications/blue-economy-vision-scotland/pages/6/>





- Low impact, demonstrably by-catch free, high-value nature and climate positive fisheries, with healthy and resilient stocks, support sustainable fishing opportunities, coastal communities and a growing domestic seafood market.²

Good management of fishing activities in relation to the environment and communities is essential to achieving those targets.

LINK members recognise that the Scottish Government has taken positive steps to improve sustainability and respond to environmental and industry issues, such as:

- Some MPAs have fisheries management measures in place;
- Scottish waters have been closed to Sandeel fishing;
- REM is mandated on scallop dredging and pelagic fleets with acknowledgement of further roll out;
- Effective use of variations to licencing conditions, such as the recent ban on landing berried lobsters;

We also welcome the opportunity to engage in fisheries management and governance through stakeholder forums, such as Fisheries Management and Conservation Groups (FMAC). We support the recognition of these forums that fisheries management is a matter for multiple interests, and not just fisheries and management authorities.

However, it is the view of LINK members that the Scottish Government's implementation of existing commitments needs to be more comprehensive, with clearer timeframes for delivery, alongside stronger, more effective governance arrangements in order to achieve environmental, social and economic goals.

4. What does not work well with the current national approach to inshore fisheries management in Scotland and needs to be improved?

For many years, the Scottish Government has been promising to deliver a step change in fisheries management to facilitate environmental improvement, a sustainable fishing industry and thriving coastal communities. LINK members agree that while some measures and policies have been implemented well (see question 3), the system change that is needed to shift the management paradigm to one where a degraded environmental baseline is no longer accepted for future generations still needs to be effectively established. The health of Scotland's seas continues to decline. Scotland's Marine Assessment highlights "*Pressures associated with bottom-contacting and pelagic fishing continue to be the most geographically widespread, direct pressures across the majority of*

² https://www.scotlink.org/wp-content/uploads/2020/12/OceanRecoveryPlan_singlePages.pdf





Scottish Marine Regions and Offshore Marine Regions". Scientific and fisheries monitoring evidence shows that many mobile fishing sectors are not currently operating within environmental limits³⁴⁵.

We wrote to members of the Rural Affairs and Islands Committee when they convened on 5th February to hear evidence from Scottish Government officials on IFMI. In that letter we stated: "*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*".⁶

LINK members believe that much of the significant change needed to policy implementation and outcomes can be delivered through existing legislative and policy provisions, many of which are not being used to their full potential. Key benchmarks of ecological health, such as Good Environmental Status, have not been met, spotlighted recently by the Office of Environmental Protection (OEP) launching an investigation into the potential failure of DEFRA to deliver on GES for English seas by the deadline of 2020⁷. The recently published Programme of Measures was underwhelming, published 4 years on from the public consultation, and many of the measures and actions included since 2015 are still to be fully implemented, including the designation of new MPAs where fisheries management measures have not been established.

Vessel monitoring and tracking through Remote Electronic Monitoring (REM) across the Scottish fishing fleet was promised in both the previous and current Parliamentary Sessions and is still outstanding for many sectors. Although the full extent of compliance is unknown due to inadequate monitoring it is suspected that compliance in general is inadequate, with potential penalties that are not sufficient to deter illegal fishing activities. There is also a high expectation on local people who report infringements to provide the bulk of the evidence required for prosecution. The roll out of Remote Electronic Monitoring would improve monitoring, compliance and transparency of the fleet.

Fisheries management measures to protect PMFs within marine protected areas have been in development for the last 10 years and many still have not been adopted, leaving vulnerable PMFs

³ <https://nationalperformance.gov.scot/national-outcomes/explore-11-national-outcomes/environment/about-environment-national-indicators/sustainability-fish-stocks>

⁴ <https://doi.org/10.1371/journal.pclm.0000059>

⁵ <https://researchonline.gcu.ac.uk/files/79221434/63458251.pdf>

⁶ <https://www.parliament.scot/chamber-and-committees/committees/current-and-previous-committees/session-6-rural-affairs-and-islands-committee/business-items/inshore-fisheries>

⁷ <https://www.theoep.org.uk/news/oep-launches-investigation-suspected-failure-defra-take-necessary-measures-achieve-good>





exposed to high risk activities. Generally, the principles for establishing fisheries management measures in MPAs, in which a feature-led approach based on remnant “least damaged most natural” areas provide the bare minimum measures needed to reduce further decline of PMFs. 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 (as committed in the Future Fisheries Management Strategy 12-point action plan). 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.

Key fish stocks are still declining, such as Atlantic cod. The repeal of the West Shetland Shelf (“Windsock”) cod spawning area in 2019 was allowed to happen at a time when ICES issued advice for a Total Allowable Catch of zero cod on the west coast of Scotland. While we recognise the willingness of fishing industry members to adopt a voluntary approach to spatial management in its stead, the measures agreed were decided between industry and government representatives and is a much reduced restriction compared to the previous measures. The Sea Fish (Prohibition on Fishing) (Firth of Clyde) order for the protection of spawning cod remains challenging for many reasons. Despite removing exemptions for certain fishing activities in 2022, the Clyde cod populations are showing limited signs of recovery. Furthermore, during the Parliamentary scrutiny of the Order in early 2022, there was lack of transparency on the evidence being used to underpin the removal of exemptions. Cod is a PMF and an important predator. Evidence presented by Dr Ana Adao’s PhD research (Strathclyde University) shows that cod bycatch in the Clyde *Nephrops* trawl fishery is still too high to enable population recovery⁸, and therefore this issue must be properly addressed in addition to the spatial restriction during the spawning season. A more general point is that the recognition of the ecological role of fish (especially those identified as PMFs) and their assessment as commercial species is not well aligned in the national policy context. This case study highlights the challenges of implementing national policy for regional issues and supports the case for a more regional approach to fisheries management.

The current national approach to inshore fisheries management in Scotland does not effectively address bycatch and entanglement, despite clear scientific evidence and recommendations for mitigation. Species such as seabirds, marine mammals, and non-target fish continue to be impacted. A more proactive approach is needed, incorporating evidence-based solutions (such as sinking creel lines, a relatively simple and inexpensive gear adaptation), improved data collection, effective monitoring, and stronger regulations. The successful cross-sector partnership the Scottish Entanglement Alliance has undertaken and published extensive research into large animal entanglements in Scottish waters over the last 5 years, and has provided clear evidence that sinking creel lines significantly reduce the

⁸ <https://stax.strath.ac.uk/concern/theses/cz30pt38z>





risk of entanglement to the benefit of both large marine animals and local fishers⁹. There are also questions around the sustainability of gillnets given the impact that they have on target species across a range of taxa including marine mammals and seabirds. Alternatives for this gear type can and should be explored more effectively with a view to transitioning.

The UK Fisheries Act 2020 requires the Scottish Government to use quota allocation to incentivise behaviour change (section 25). This is not acknowledged in the 2024 Fishing Quota Management Rules although it is mentioned in relation to the consultation on allocation of additional quota. Allocation of quota and other management measures, such as licence conditions, should be underpinned by environmental good practice and efforts to improve sustainability.

Access to open fisheries and environmental data in Scotland remains limited, posing a significant challenge for transparent, evidence-based management of marine resources. Despite commitments to ecosystem-based fisheries management, data on fish stocks, fishing activity, and environmental baselines is often difficult to access, fragmented, or not regularly updated. This lack of openly available data reduces accountability, impedes stakeholder participation in decision-making, and weakens the ability to assess the long-term sustainability of Scotland's inshore fisheries. Data on seafloor habitats, fish population trends, and the effectiveness of MPAs is often patchy, and in many cases with long delays in reporting. This contrasts with models in other regions, such as the Norwegian Fisheries Directorate, which provides near real-time data on vessel activity and landings, improving transparency and stakeholder engagement¹⁰.

LINK members are concerned that when it comes to fisheries management the policy goalposts keep shifting. The current Call for Evidence has been launched in response largely to commitments that were not fulfilled as part of the dissolved Bute House Agreement, such as introducing a cap on inshore fishing activity (to three nautical miles) as a "ceiling from which activities that disrupt the seabed can be reduced", and does not follow on from the processes set out in the Future Fisheries Management consultation or the UK Fisheries Act 2020. 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. More recently measures for managing crab and lobster stocks, such as variations to licensing conditions to prevent landing of berried females, are welcome but they are limited in scope and impact to support wider reform in fisheries management. The Marine Conservation Society's Good Fish Guide currently assesses just one crab fishery as sustainable (Shetland) and there are examples of best practice from this fishery that can be emulated by fisheries management authorities.

⁹ <https://scottishentanglement.org/downloads/new-paper-successful-collaborative-trials-of-simple-gear-modifications-to-reduce-entanglement-of-whales-and-other-megafauna-in-scotland's-static-pot-creel-fisheries/>

¹⁰ <https://globalfishingwatch.org/norway/>





Whilst the delays to the development of the FMP's is disappointing, we recognise the challenging timelines and complexity of the task. The Scottish Government should use this opportunity to learn from strengths and weaknesses of the published English FMP's and develop strong robust policies. The FMPs must follow expert guidance and be aligned with the eight objectives of the Fisheries Act 2020. The Office for Environmental Protection (OEP) 'Progress in improving the natural environment in England 2023/2024' report¹¹ published in January 2025 states that "some objectives were completely missing from the five published [English] FMPs and the desired actions were often poorly defined without specific milestones and timelines." The OEP has called for:

- Clearer identification of the policies that fisheries must apply to restore or maintain relevant fish stocks at sustainable levels;
- Adoption of more prescriptive language;
- A more precautionary approach to fisheries management.

Spatial management of fishing continues to be avoided within national scale policy implementation. Scotland's National Marine Plan 2 will not address fisheries management, a decision with which LINK members do not agree. While the current National Marine Plan does not integrate fisheries management as fully as it should, its structure of Sea Fisheries objectives (creating sustainable economic opportunities for fishing) nested within General Policies (e.g. activities must not harm the national status of PMFs) is an important foundation. Fisheries is a siloed policy area in the Scottish Government and is not well integrated with other areas of marine policy, despite ambition to do so. Scotland's Fisheries Management Strategy 2020-2023¹² states under a section about 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."

Furthermore, there have been significant missed opportunities for implementing strategic spatial management of fisheries in the last decade. The 2014 consultation on New Controls in the Scottish King Scallop Fishery omitted spatial management options from the scope of the proposed measures, despite public appetite to explore this¹³. Similarly the review of potential policy options to reduce conflict

¹¹ <https://www.theoep.org.uk/index.php/report/government-has-chance-get-track-meet-legal-environmental-commitments-window-opportunity>

¹² <https://www.gov.scot/binaries/content/documents/govscot/publications/strategy-plan/2022/09/scotlands-fisheries-management-strategy-2020-2030-delivery-plan/documents/scotlands-fisheries-management-strategy-2020-2030-delivery-plan/scotlands-fisheries-management-strategy-2020-2030-delivery-plan/govscot%3Adocument/scotlands-fisheries-management-strategy-2020-2030-delivery-plan.pdf>

¹³ <https://www.gov.scot/publications/consultation-new-controls-scottish-king-scallop-fishery-2014-outcome-report/pages/5/>





between static and mobile fishing vessels was a missed opportunity for spatial management of gear types (such as areas for creeling and areas for trawling). Such an approach could deliver on both socio-economic and environmental goals by separating gear and allowing preferential access to lower impact fishing methods based on seabed resilience. There were also missed opportunities to test large-scale spatial management of fishing activities through the Inshore Fisheries Pilots programme launched in 2017. It is the view of LINK members that spatial management of fishing is a critical part of ecosystem-based management and of the wider ambition of managing marine activities for sustainable development.

Given the current timescale aims to consult on the inshore management measures at the end of 2025, an FMP for the environmentally high-risk king scallop dredge fishery should be prioritised as an interim measure. Under the current management regimes there are very few areas restricted to scallop dredging and we believe that characterising the scallop fishery footprint is an urgently needed step to prevent over exploitation and habitat damage. Using this footprint, specific areas should then be identified for scallop fishing, managed through consideration of a permitting or licensing scheme, like that in the NE IFCA district.

Physical disruption of the seabed through mechanical dredging and trawling is acknowledged as the main barrier to achieving GES for [Benthic Habitats Descriptor](#). Area closures for scallop dredgers will not only improve the stock sustainability by protected spawning stock and larval settlement but also provide wider protection for other marine species and habitats. Prohibiting scallop dredging outside of identified permitted areas will effectively 'freeze' the existing footprint and prevent the expansion of the fleet into other areas of concern. In addition to this we believe that transitioning towards a model that enables access to the fishery via fishing methods that protect benthic features of the MPA network is essential. Such measures would help toward achieving the sustainability and ecosystem objectives as well as creating a positive step forward to achieving GES. Well-managed lower impact fishing methods, such as creeling, are considered lower risk to benthic habitats than bottom towed gear, but we would support a system whereby creel effort is appropriately capped to prevent proliferation of creeling activity that might increase the risk of damage to the seabed.

There is an opportunity to develop proactive management that is in line with the precautionary approach and seeks to prevent unforeseen damage to sensitive habitats. The characterisation of the scallop footprint and a prohibition on bottom towed gear within MPAs designated for benthic features should be a priority. This could be achieved through designating permitted scallop fishing grounds, rather than just closing areas. The introduction of mandatory REM on the scallop dredging fleet is a positive step that could be further developed to allow access to the fishery and enable fishers to promote sustainable practice and improve access to market by providing transparency in the supply chain that will help deliver high levels of confidence in the sustainability of the fishery.

As set out in the LINK-supported Future Fisheries Alliance response to the 2022 Future Catching Policy consultation, in order to help deliver a just transition for fisheries in Scotland we would like to see:



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1. A mechanism to improve inshore fisheries governance and transition to a new spatial management regime, which includes a presumption against trawling and dredging in a significant part of Scotland's inshore waters
2. Binding targets to end overfishing and eliminate the bycatch and entanglement of non-target and protected species
3. A requirement for fully documented fisheries delivered through Remote Electronic Monitoring with cameras to improve data collection and help to end Illegal, Unreported and Unregulated (IUU) fishing
4. A new vessel licensing system that allocates fishing opportunities according to transparent and objective environmental, social and economic criteria to incentivise the most sustainable low impact fishing practices
5. Fisheries Management Plans developed for all commercially targeted stocks and species and which explicitly deliver on the Fisheries Objectives within the Fisheries Act 2020.
6. A comprehensive and transparent review undertaken of Scotland's fishing capacity, inshore and offshore, in relation to fishing opportunities.

LINK members believe that a step change in fisheries management in Scotland should be supported by new regional inshore fisheries governance bodies, akin to the Inshore Fisheries and Conservation Authorities in England. Currently, Scotland's Regional Inshore Fisheries Groups (RIFGs) are exclusive to fishing interests, have no clear responsibilities, and have limited resourcing and powers to meaningfully develop fisheries management measures. The RIFG areas are also not aligned with other regional management designation, such as the Scottish Marine Regions (2015). As regional fisheries management must be integrated with Regional Marine Planning, it makes sense to have consistency in a regional approach to policy. LINK members support ambition for co-management of fisheries, but this has not been clearly defined by the Scottish Government.

Part 3 – What does successful inshore fisheries management look like?

For the following questions, please supply evidence or information that supports your answers where possible.

5. What are the most important economic outcomes for inshore fisheries management, to you?

LINK members believe that the most important economic outcomes for inshore fisheries management should focus on long-term sustainability, resilience, and equitable benefits for coastal communities. A thriving inshore fishery depends on the health of fish and shellfish populations, which serve as the foundation of economic stability for the sector. Ensuring the recovery and maintenance of these stocks is essential, as depleted populations undermine both livelihoods and the marine environment. The Scottish Government's Future Fisheries Management Strategy (2020-2030) highlights the need for ecosystem-based management to support economic sustainability, reinforcing the importance of restoring fish stocks to create a more reliable and productive inshore economy.



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Expanding local, sustainable fishing opportunities is critical. A more equitable distribution of quota and access to fisheries can help address longstanding imbalances, ensuring that small-scale fishers and coastal communities benefit from Scotland's marine resources. The National Marine Plan emphasizes the need to manage fisheries to provide economic and social benefits while safeguarding marine ecosystems. Fisheries policy should enhance economic security for small-scale fishers while promoting sustainable practices.

Improving the efficiency and selectivity of fishing gear and techniques is another crucial economic priority. By investing in innovations that reduce bycatch and environmental impact, fishers can lower costs while increasing the long-term viability of their businesses. The Fisheries Act 2020 objectives aimed at improving sustainability and minimising waste align with the need to modernise inshore fisheries management. Reducing habitat damage through low-impact fishing methods also contributes to climate and biodiversity objectives ensuring that marine ecosystems continue to provide economic benefits for future generations.

Small-scale, low-impact fisheries play a vital role in Scotland's coastal economy, yet they often face disproportionate challenges in accessing resources and markets. Prioritising preferential access to inshore fishing grounds for these fleets can help sustain traditional fishing communities while reducing pressure from more industrialized practices. 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 sustainable¹⁴.

Strengthening local economies by improving supply chains and supporting high-quality, locally landed seafood will ensure that the economic benefits of fisheries are felt within coastal communities. Increasing direct sales opportunities, local processing, and better market access for sustainable seafood can help retain value in Scotland's coastal regions. The Scottish Government's Blue Economy Vision reinforces the importance of creating a resilient seafood sector that benefits local communities while enhancing environmental sustainability.

6. What are the most important environmental outcomes for inshore fisheries management, to you?

LINK members recognise the scientific evidence that demonstrates a thriving sustainable fishery must be underpinned by a healthy and ecologically diverse marine environment¹⁵¹⁶¹⁷. However, as

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[https://eprints.whiterose.ac.uk/105473/1/Beukers Stewart Beukers Stewart 2009 Scallop Fisheries Management.pdf](https://eprints.whiterose.ac.uk/105473/1/Beukers_Stewart_Beukers_Stewart_2009_Scallop_Fisheries_Management.pdf)

15 https://link.springer.com/content/pdf/10.1007/978-3-031-16277-0_20.pdf

16 <https://www.nature.com/articles/s41598-021-82847-4.pdf>

17 <https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2020.00076/full>



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previously mentioned, high impact fishing methods (such as those that disrupt the seabed or result in significant levels of bycatch) are one of the main pressures affecting the health of the marine environment. LINK members urgently want to see a just transition to a climate-smart, nature-friendly fishing fleet that operates within environmental limits and supports sustainable opportunities, coastal communities and domestic seafood supply chains.

The outcome we want to see for the environment is recovery and improved resilience of marine ecosystems, including an increase in seafloor integrity, increasing fish populations and essential fish habitats, recognition of the importance of, and action to protect, blue carbon habitats and species (which also includes fish in oceanic carbon cycling). Ecosystem-based fisheries management can support this outcome, but it also must be implemented in relation to the management of other sectors and industries through ecosystem-based marine planning. As we stated in our response to the Future Fisheries Management discussion in 2019: “Commercially targeted fish and shellfish species are biodiversity, an intrinsic component of marine natural heritage. The health of their stocks is therefore inextricably linked to the health of the wider marine ecosystem, particularly the seabed habitats that support critical life history stages such as breeding, spawning, nursery and feeding areas, the species upon which they prey and the species that prey on them. We would therefore support technical and spatial conservation measures that protect and recover critical fish and shellfish habitat, fish stock recovery areas (including use of No-Take Zones) and Vulnerable Marine Ecosystems (VMEs) and that eliminate bycatch.”

LINK members agree that a significant overhaul to inshore fisheries management is needed to achieve the environmental, economic and social outcomes needed for Scotland’s seas. As discussed under question 4, LINK members want to see a just transition to a modern, world-leading climate and nature friendly fishing industry in Scotland and believe the Scottish Government should prioritise:

- Implementation of existing legislative and policy requirements and provisions, including UK Marine Strategy Regulations (GES), UK Fisheries Act objectives and FMPs, adoption of fisheries management measures in MPAs and for PMFs outside MPAs;
- A review of Scotland’s fishing capacity and a full assessment of whether it is compatible with environmental limits;
- Spatial management: We have long advocated for spatial management of fishing, including an inshore low impact zone comprising No-Take Zones, static-gear only zones, low impact mobile-gear only zones (but only where this can be demonstrated) and areas for nature conservation.¹⁸
- Fully documented fisheries, through the urgent roll out of REM with cameras across the fleet;
- Reducing carbon footprint of fishing/improving efficiency;

¹⁸ <https://www.parliament.scot/-/media/files/committees/rural-affairs-islands-and-natural-environment-committee/pe1951-reinstate-inshore-coastal-limit-submission-by-marine-conservation-society.pdf>





- Eliminating bycatch of non-target species and entanglement of marine mammals, including priority roll out of scientific recommendations for creeling (sinking lines), a cap on creel numbers and removal of set nets from areas of high risk;
- Reform of regional fisheries and conservation governance (see responses below);
- Greater incentivisation and reward of good practice and lower impact activities, such as through spatial management and quota allocation. The Future Fisheries Management Strategy 2020-2030 states that: “We have continued to support opportunities to diversify inshore fisheries where possible, and, as part of our move towards a just transition, to provide additional fishing quota opportunities to inshore vessels to support diversification, for example to lower impact catching methods”. The just transition for Scottish fisheries must be a clear objective of the IFMI policy proposals and regional management model.

FMPs for all Scottish stocks must include clear binding targets and desirable management outcomes to 1) restore/maintain the target stocks at Maximum Sustainable Yield (MSY); 2) minimise bycatch; 3) avoid/minimise habitat impacts; 4) maximise economic and social benefit, and meet all 8 Fisheries Objectives as required by the UK Fisheries Act (2020) and the Joint Fisheries Statement (2022). There should also be a clear description or pathway on how the objectives of the FMP will implement an ecosystem-based approach to deliver the relevant Good Environmental Status (GES) Indicators under the UK Marine Strategy. The relevant GES Indicators include (C2): Seabed subject to high pressure from human activity; (C3): Diverse seas: status of marine mammals and marine birds; (C4): Diverse seas: condition seafloor habitats; (C5): Diverse seas: condition of pelagic habitats; (C6): Diverse seas: status of threatened and declining features; (C7): Healthy seas: fish and shellfish populations; (C8): Healthy seas: marine food webs functioning; (C9): Healthy seas: seafloor habitats functioning; (C10): Productive seas: fish and shellfish stocks fished sustainably; (C11): Productive seas: status of sensitive fish and shellfish stocks; (D7): Species supporting ecosystem functions; (E9): Percentage of our seafood coming from healthy ecosystems produced sustainably.

7. What are the most important social outcomes for inshore fisheries management, to you?

LINK members believe that inshore fisheries management must prioritise social outcomes that sustain and enhance the well-being of coastal communities, ensuring they can be vibrant and resilient for generations to come. Thriving coastal communities depend on a healthy marine environment supporting productive fisheries, which provide jobs, support local economies, and foster strong social connections. A well-managed inshore fishery can help sustain these communities by ensuring long-term, stable employment and economic security for fishers and those in related industries such as seafood processing, tourism, and marine services.

The retention of cultural heritage is another essential social outcome of effective fisheries management. Scotland’s fishing traditions are deeply embedded in the identity of coastal communities, shaping local customs, festivals, and ways of life. By safeguarding sustainable fishing practices and supporting small-scale, low-impact fisheries, this rich heritage can be preserved while adapting to



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modern challenges. Policies that promote locally-led fisheries management can help ensure that fishing remains an integral part of Scotland's coastal identity.

Future careers in sustainable fishing must be a priority to prevent generational decline in the industry. Young people in coastal communities need opportunities to enter the fishing sector with secure, viable livelihoods. This requires not only sustainable fish stocks but also funding and capacity for training, apprenticeships, and support for small-scale fishers. The Scottish Government's Future Fisheries Management Strategy (2020-2030) acknowledges the need to attract new entrants into the industry and provide the skills necessary for sustainable fisheries management.

Ensuring access to high-quality local seafood is a key social benefit of well-managed inshore fisheries. When fisheries are sustainably managed, they provide fresh, locally sourced seafood that supports healthier diets and strengthens the link between consumers and coastal communities. By improving local supply chains and encouraging direct sales, Scotland can enhance the availability of locally caught fish and shellfish, reducing reliance on imports while boosting local economies. Greater consumer confidence in sustainable seafood is an important aspect of this. When consumers trust that the seafood they purchase is sourced responsibly, they are more likely to support local fishers who use sustainable practices. Transparency in supply chains, labelling and certification schemes can reinforce this confidence. The Scottish Government's Blue Economy Vision highlights the importance of sustainability in maintaining public trust and ensuring that Scotland's seafood industry remains competitive in both domestic and international markets.

Part 4 – Regional inshore fisheries management

There are currently a number of methods of spatially delineating Scotland's coast when considering regional management models. For example:

- 5 Marine Directorate Coastal Operation Districts
- 18 Marine Directorate Fisheries Offices
- 6 Regional Inshore Fisheries Groups (RIFG)
- 11 Scottish Marine Regions proposed in the National Marine Plan (NMP)
- 9 Scotland Island Regions (not including mainland Scotland)
- Scientific stock assessment areas (differing per fishery)

For the following questions, please supply evidence or information that supports your answers where possible.

8. Do you favour or oppose a potential transition to a more regional model of inshore fisheries management in Scotland?

Strongly favour

Moderately favour



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Neutral
Moderately oppose
Strongly oppose

Please supply evidence or information that supports your answer where possible.

We support the principle that fisheries management should be decentralised to the lowest appropriate level, provided there remains national oversight and accountability. This aligns with the Convention on Biological Diversity's Ecosystem Approach, which states that "decentralized systems may lead to greater efficiency, effectiveness, and equity." Management should involve all stakeholders, balancing local interests with the wider public good, and ensuring both responsibility and ownership over environmental stewardship.

9. What should we be mindful of when considering the potential transition to regional inshore fisheries management in Scotland?

When considering the potential transition to regional inshore fisheries management in Scotland, it is essential to ensure that the process is inclusive and guided by ecosystem-based objectives. Effective management must take into account not just fisheries governance but also the broader system, including landings, business models, markets, and processing, for a just transition to a resilient and sustainable inshore sector.

A transition to regional management must also deliver inclusive and robust governance in line with the Aarhus Convention, ensuring transparency, accountability, and public participation. Co-management structures should embrace participative decision-making at the regional sea-basin level, incorporating effective stakeholder participation and integrating local knowledge with scientific evidence. Participation in regional governance must be fair and inclusive, ensuring that marginalised or under-represented voices are identified and brought in.

The UN Food and Agriculture Organisation (FAO) guidance¹⁹ on developing management plans for fisheries includes the following recommendations, which LINK members support as a minimum approach to transitioning to a regional fisheries governance system:

- Define the institutional arrangement for managing the fishery including the roles and responsibilities of mandatory authorities, non-mandatory organisations and key interested parties that will support the implementation of the regional fisheries management. A consistency of approach should be adopted across Scotland;
- Define the costs likely to be incurred in managing the fishery and/or region;
- A commitment for appropriate funding to ensure sufficient human and financial resources are allocated to implement the plan;

¹⁹ <https://www.fao.org/4/y3427e/y3427e0b.htm#TopOfPage>





- Should recognise fish stocks are public goods and that co-management of fisheries should address the interest of all stakeholders, not selected groups of stakeholders;
- Ensure consistent approach for an open, participatory, and fully transparent stakeholder engagement process. Opportunities for participating in advisory groups or relevant committees to support the development of FMPs and regional fisheries management should be publicly available to all stakeholders.

10. Could any of the existing coastline delineations (as outlined above) be used for regional inshore fisheries management or do we need a new/different approach/delineation?

The Scottish Marine Regions provide the most logical framework for regional inshore fisheries management, as they align with existing Regional Marine Planning structures, ensuring better integration between fisheries management and broader marine environmental and economic considerations. These delineations would support a more holistic, ecosystem-based approach to inshore management, addressing cross-cutting issues such as spatial planning, conservation, and economic resilience.

We support proposals to strengthen regional inshore fisheries management from current IFG arrangements, including extending their remit out to 12 nautical miles, which would improve their integration with regional marine planning. We also support the possibility of new regional fisheries authorities having fisheries management powers to make responsible and regionally appropriate fisheries management decisions, if the new group structure was representative and appropriately constituted. However, for this approach to be effective, regional inshore fisheries management groups must be adequately resourced and reformed to ensure broader stakeholder representation beyond just mobile and static commercial fishing interests. The English Inshore Fisheries and Conservation Authorities (IFCAs) offer a valuable model in this regard, with one study highlighting that 12 different stakeholder groups are represented on IFCA Committees or Boards, compared to only two in Scotland's current IFG structure. We were particularly alarmed by comments made during the Rural Affairs and Islands Committee session on 5th February, in which it was highlighted that Marine Directorate resourcing will constrain the ambition and level of reform possible for inshore fisheries. The purpose of the IFMI call for evidence should be to achieve the best approach possible to fisheries management and seek to secure the budget to deliver the best outcome.

A new local inshore fisheries management arrangement could also benefit from cost recovery mechanisms to ensure long-term financial sustainability.

11. Please explain why the delineation you suggested above would work better than others? What are potential benefits/strengths of this approach?

Aligning regional sectoral management with marine planning (which must incorporate the activities of all sectors) is simpler, more efficient and would make it easier to integrate in Regional Marine Plans.



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The current RIFG areas are geographically disproportionate to each other. For example the East Coast RIFG region has a huge geographic remit in comparison to others. The Scottish Marine Regions are delineated in a way that takes better account of the variation in geographic character around the Scottish sea area and coastline and comprise more manageable regional units.

12. What are potential challenges/weakness of the delineation you suggested above?

Lack of funding and capacity at a national and local authority level to complete the roll out of regional marine planning partnerships and integrate new regional fisheries bodies. Political will to facilitate the RMPP development is also lacking, with the Scottish Government's response to the former Environment Climate Change and Land Reform (ECCLR) committee's inquiry on RMPs stating that: "There are lessons to be learnt for the development of regional plans to date. The new NMP2 will also update the context for the long-term development of RMPs. Therefore, we believe that no further Marine Planning Partnerships should be established until after the adoption of the NMP2. In this way we can ensure policy alignment between future RMPs and NMP2."²⁰ LINK members note that with the NMP2 development already delayed and adoption of the new plan pushed back into the next Parliamentary session, the Scottish Government is effectively kicking the can down the road. Rather, we feel that regional approaches to management of marine activities should not be put on hold as such mechanisms offer a more ecosystem-based approach providing a greater chance of halting environmental decline by 2030.

Part 5 – Governance & Co-management

When we talk about governance, we are referring to the structures in place to advise, discuss and be accountable to Scottish Ministers in the process of making decisions.

When we talk about co-management, we are referring to strategic decision making and a shared responsibility for management and delivery whilst respecting the ultimate accountability of Scottish Ministers to the Scottish Parliament and the general public.

13. What stakeholder groups should be involved and how should each feed into development of inshore fisheries management measures?

Effective inshore fisheries management requires meaningful engagement from a broad range of stakeholders to ensure decisions are transparent, inclusive, and reflect the full range of interests in Scotland's marine environment. As noted in our response to question 3, the Fisheries Management and Conservation (FMAC) forum already recognises the need for multi-interest input into fisheries and conservation discussions, and we consider this model to be a minimum standard for stakeholder engagement.

²⁰ <https://www.parliament.scot/-/media/files/committees/net-zero-energy-and-transport-committee/correspondence/2023/regional-marine-plans-in-scotland-31-july-2023.pdf>





In our 2019 response to the Future Fisheries Management discussion paper²¹, we emphasised the need for high levels of accountability, visibility, and transparency in decision-making to ensure fisheries management complies with the Aarhus Convention. However, we acknowledge the challenge of balancing broader stakeholder engagement with the desire to simplify and streamline decision-making processes. Any restructuring must avoid excluding key voices and instead create mechanisms for wide engagement across civic society, ensuring that all who benefit from well-managed seas have an opportunity to contribute.

With growing interest from local communities, individuals, and young people²² in marine decision-making, it is particularly important that greater local community involvement is built into the process. Fisheries management should actively seek input from those who depend on healthy inshore waters for their livelihoods, cultural heritage, and recreation. This means incorporating perspectives from coastal communities, conservation groups, recreational fishers, marine tourism operators, scientists, and local businesses, alongside commercial fishing representatives.

14. What checks should be put in place to ensure transparency, fairness and accountability when appraising inshore fisheries management options?

Our suggestions for key checks and balances that will be needed when appraising inshore fisheries management options are included in our answers throughout this call for evidence. To summarise:

- Inshore fisheries management must be underpinned by an ecosystem approach and should align with the objectives of the UK Fisheries Act and duty to achieve Good Environmental Status. Nature conservation and fisheries policy should be better integrated, including through marine planning, to support recovery of fish and shellfish populations and essential fish habitats.
- Clear targets and measurable outcomes for inshore fishing are needed (including existing indicators, such as the descriptors for Good Environmental Status).
- Regional governance should establish clear responsibilities and accountability at all levels. Stakeholder and community participation should be more inclusive, with improved co-management frameworks.
- Fisheries and environmental data should be made more accessible and how data are used in decision-making should be clearer. REM with cameras must be fully implemented across the Scottish fleet and used dynamically to support improved management.
- Greater incentivisation of environmental sustainability, lower impact and good practice must be enabled through policy frameworks. Ecosystem-based spatial management is a key part of this.

²¹ https://www.scotlink.org/files/documents/SELINK_FFM_FINAL_120719-1.pdf

²² <https://doi.org/10.1016/j.marpol.2020.104312>





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