

## Have your say on the Arran MPA!

### South Arran Marine Protected Area Proposal

Please complete this 2 page form and hand it in to the Brodick Tourist Information Office (or post to Marine Scotland at the address below). The questions are based on Marine Scotland's public consultation response form ([www.scotland.gov.uk/Publications/2013/07/2072/downloads](http://www.scotland.gov.uk/Publications/2013/07/2072/downloads)). You can also complete the response form online and find out more about the Arran MPA at [www.arrancoast.com](http://www.arrancoast.com). The public consultation ends on 13 November 2013.

**Do you support the development of an MPA network in Scotland's Seas with 3 MPAs in the Clyde?** Yes  No

**Do you have any comments on the case for *designation, management options and socioeconomic assessment* for the *South Arran* possible Nature Conservation MPA?**

Designation:

Comments I agree to the location of the South Arran MPA. It covers many important habitats, most of which I have intimate knowledge of and many of which have, over the last 40 years, been increasingly degraded by scallop dredging. Every year I witness further attempts to dredge into shallower rocky, and cobbly areas. If Richard Lohead & Marine Scotland are to have any chance of succeeding in their Clyde 2020 project, all the Clyde MPAs proposed at present will not suffice, as they will not cover a sufficient area to enable the seabed regeneration needed for gadoid nursery areas. The Government will also need to urgently put in place proper spatial & effective effort control management throughout the entire Clyde. This is something the Clyde IFGs proposed management plan fails to even attempt in its proposals. I do not believe that the 3 MPAs proposed for the Clyde cover a wide enough area to attain GES (needed for the whole Clyde not just MPAs) under MSFD and they will certainly not allow the Clyde to fulfil the Government's commitments to the WFD by 2015.

It must be remembered by the Scottish Government that the present MPA consultation is the second similar consultation for Arran waters. In 2008 a Government consultation showed 99.3% of respondents in favour of the Lamlash No Take Zone. 67.8% of respondents were also in favour of a MPA in the remainder of Lamlash Bay. The Government choose to ignore the majority of those respondents and instead favoured a veto of the MPA in the Arran communities' proposals, by 2 scallop dredgers.

Management Options:

Comments COAST's management options are the only practical and workable management option if the Cabinet Secretary is sincere in his commitment, made on 24th May 2012 at Holyrood, that the Scottish government will put in place the necessary management measures to resurrect the Clyde. What I and the majority of respondents to the consultation want (the exclusion of mobile bottom towed gear from MPAs) is looked upon by our Scandinavian neighbours as basically a birth

right for its population. They all exclude Scallop dredging from their entire inshore waters. Should the Scottish government not ask itself why? If the Scottish Government really wants to emulate Norway it needs to start managing our inshore waters for the benefit of all Scotland's people not just a few favoured dredgers. COASTs management recommendations are the bare minimum for all our inshore waters. They are really just a basic foundation towards overall better Clyde management, which will lead to an improved environment and resurrection of a potentially sustainable local Clyde based fishing industry.

The enforcement of both future MPAs & Clyde fishery management requires the necessary compliance vessels. In my opinion, at present, the Scottish Government are in dereliction of its duty under EC statute to adequately patrol our inshore waters. Whereas English IFCA's have **40 vessels** at their disposal, dedicated to its inshore waters, Scotland with **DOUBLE** the coastline has just **ONE** dedicated inshore patrol vessel plus the occasional RIB in summer. The IFCA vessels can also be used for scientific research & monitoring on a local basis but this does not happen in Scotland. Evidence points to the Scottish Government wasting funds on subsidising unsustainable mobile fishing practices rather than spending public funds where they are most needed, which is on local fishery management, compliance and science.

## Socioeconomic Assessment:

**Comments** A well managed creel & shellfish dive fishery within the proposed MPA will have more than double the present economic value of the present scallop dredging within the area. Healthier nursery areas for juvenile gadoids & the eventual return of Sea Angling means the decision on the south Arran MPA should be a no brainer for the Cabinet Secretary.

The small Lamlash No Take Zone (NTZ) has resulted in the island benefiting by hundreds of thousands of pounds over the last 5 years from locally based research. Tourism on Arran has also benefited from Scotland's only NTZ being sited on Arran, with vastly increased visitor interest. Furthermore, the dozens of hours of primetime TV & radio programmes reporting on the Lamlash Bay Community Reserve, not just in the UK but across Europe & recently right across the USA., results in advertising for Arran tourism that is literally priceless.

The Economic report by ABPmer commissioned by Marine Scotland was in the opinion of esteemed economists, who I spoke to in Scotland and Brussels, woefully inadequate and biased. The report did not take into account the downward economic trend of Clyde and west coast mobile commercial fisheries but predicted a flat line of continuing economic activity by the mobile sector. It failed to recognise the economic loss to local communities over the last 15-20 years due to the demise of recreational fishing caused by poor government management which allowed and encouraged commercial overfishing way past the Maximum Sustainable Yield. Something that was predicted by the Peida report in 1988. These are just 2 of the many points made to ABPmer which were ignored in the final report. The Cabinet secretary cannot rationally reject the designation of the South Arran MPA based upon the ABPmer economic impact assessment.

## Any other comments

I have dived in the Clyde since 1973 and had over 4500 dives. Since 2003 I have taken part in and organised varied scientific marine research around Arran. I have spent the majority of my life since 1995 volunteering with both COAST & now SIFT. With my experience I sincerely believe that we can improve the Clyde marine environment, which will lead to a better economic future for all Clyde marine stakeholders.

Marine protected areas are an essential and long overdue part of managing our inshore waters back towards a healthier state. They should be looked upon as the basic necessary foundations and should be accompanied with much improved inshore fishery management, which uses both spatial and improved effort control management to eliminate gadoid bycatch. At present in my opinion this will not happen due to the reasons below and until these issues are addressed no progress will be made.

1. There is a lack of political will to make any decisions on inshore fisheries that are based on the public good rather than short term economics. This favours just one sector and has been happening for at least 30 years regardless of which administration is in government.
2. The Scottish Government has failed in its legal obligations to manage our inshore waters as a public resource.
3. The Scottish Government continues to be part of a serious case of regulator capture by sections of the fishing industry. It has to take its legal responsibilities seriously and manage our waters for the public good as a public resource.
4. The Scottish Government continues with its failed initiatives such as the Inshore Fisheries Groups, which exclude every legitimate stakeholder except commercial fishing. Until the public have confidence that our fisheries are being managed for the common good and as a public resource IFGs will continue to fail.
5. It is important that fishermen are at the centre of local management but they cannot be allowed to continually veto improved management. Surely experience now tells the Scottish Government that it is just as important that any local management bodies are balanced with other stakeholders and public representatives. This needs to be similar to the representation on the English IFCAs.
6. Due to the above reasons, the government have basically allowed specific sectors of commercial fishing an effective veto over any new progressive management. Thereby allowing just 1 or 2 individual skippers to scupper any improved management for reasons of their personal short term gain. This leads to poor management accepting the lowest common denominator.

In my opinion until the government accept & confront the above issues, the Clyde will continue to be known worldwide as the most denuded fishery in UK waters.

Half hearted measures will not resurrect the Clyde. I propose the Cabinet Secretary finds some political will from somewhere.