

**Scottish government consultation on MPA proposals for  
designation in 2013**

**Response of the French fishing industry**



**Comité National des  
Pêches Maritimes et des  
Elevages Marins**



**Union des Armateurs à la  
Pêche de France**



**CRPMEM du Nord-Pas-de  
Calais/Picardie**



**Producers Organisation  
"FROM Nord"**



**Armement  
EURONOR**



**CRPMEM de Bretagne**



**Producers Organisation  
"Les Pêcheurs de Bretagne"**

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## **Preliminary comments**

The process of designing and managing British MPAs will have very important consequences for French fisheries. Indeed, there will be many sites in the future on the British side (Natura 2000, future MCZs, Scottish MPAs) but also in the waters of other Member States.

The socio-economic impact assessment doesn't take into account the cumulative effects on fishing industry of the several MPAs, but also offshore windfarms projects etc. in the same geographical area. Impacts are looked at site by site but many vessels are concerned by the different areas. These « cumulative » designations will limit the possibility to report the vessels' activities if some additional regulations are implemented on the sites. If the dependence to each area could seem small, several vessels could be obliged to stop their activity because of the regulation adopted in the different sites and because of the cost for adapting their fishing strategy (increase of fishing time and/or transit time, adaptation of the gear or vessel) or unavailability of catch and effort quotas.

Therefore it is essential to conduct a comprehensive study at the scale of all European sites where fishing management measures could be implemented. If the impacts of the measures proposed in this consultation may seem trivial, it can become dramatic once added to those that would be implemented in other MPAs.

It is also very important to take into account impacts not only on the activities of fishing vessels but also on coastal areas and the whole sector: these impacts have not been quantified: in France, it is estimated that one job on sea results in 4 onshore jobs. Furthermore, stopping the activity of a number of vessels could lead to a total deconstruction of coastal areas mainly based on fishing activities. The overall industry concerned by fishing (suppliers, buyers, processors, port services) is very important for the socio-economy of those regions.

## **CONSULTATION QUESTIONS**

**1. Do you support the development of an MPA network in Scotland's Seas?**

Yes  No

Comments

## **Individual possible Nature Conservation MPAs**

### **5. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Faroe-Shetland sponge belt* possible Nature Conservation MPA?**

Designation: Yes X No

The management option paper provides environmental information necessary for the analysis of this area. Thus, we'll examine this document to consider specifically the environmental objectives of this area.

In two parts "management option" and "socioeconomic assessment," we'll analyse the vessels' activity according to environmental objectives.

These different information allow to propose a change in the scope in this area.

Management Options: Yes X No

The French activity within the possible MPA "Faroe Shetland Sponge Belt" is developed in the paragraph "socio-economic assessment"

This possible MPA is fished by vessels from Brittany and Boulogne-sur-Mer. The activity of Breton trawlers is localized on the southern limit of the area, mainly between April and September, and the activity of EURONOR's trawlers (from Boulogne-sur-Mer) is more on the northern part of the area.

Conservation objectives for the trawling activity are dispersed throughout the so dense area. However, only "Deep sea sponge aggregations" points must be protected by measures such as closing area for any activity throughout the year. These points are organized into aggregations in the area and are mostly localized on the north-western half of the area, only 3 "Deep sea sponge aggregations" points are present in the area where an activity of Breton's trawlers is raised.

Trawlers fish on a small part of this MPA. Thus the protection of the habitat « Offshore subtidal sands and gravels » by a partial closure of the area will allow to achieve the conservation objectives.

We would like a modification in the definition of the perimeter of the area. Actually a minor modification of the layout of the area would allow to achieve protection objectives while safeguarding the fishing activity.

The change requested by the representatives of French fishermen is the following.

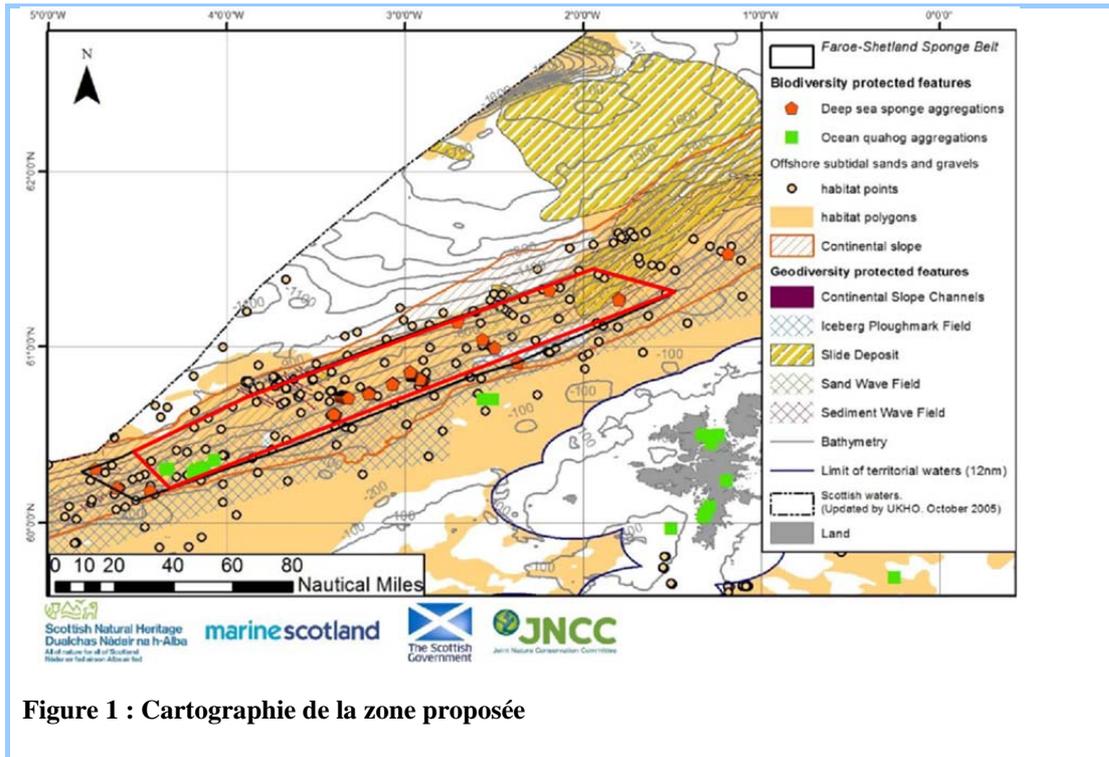


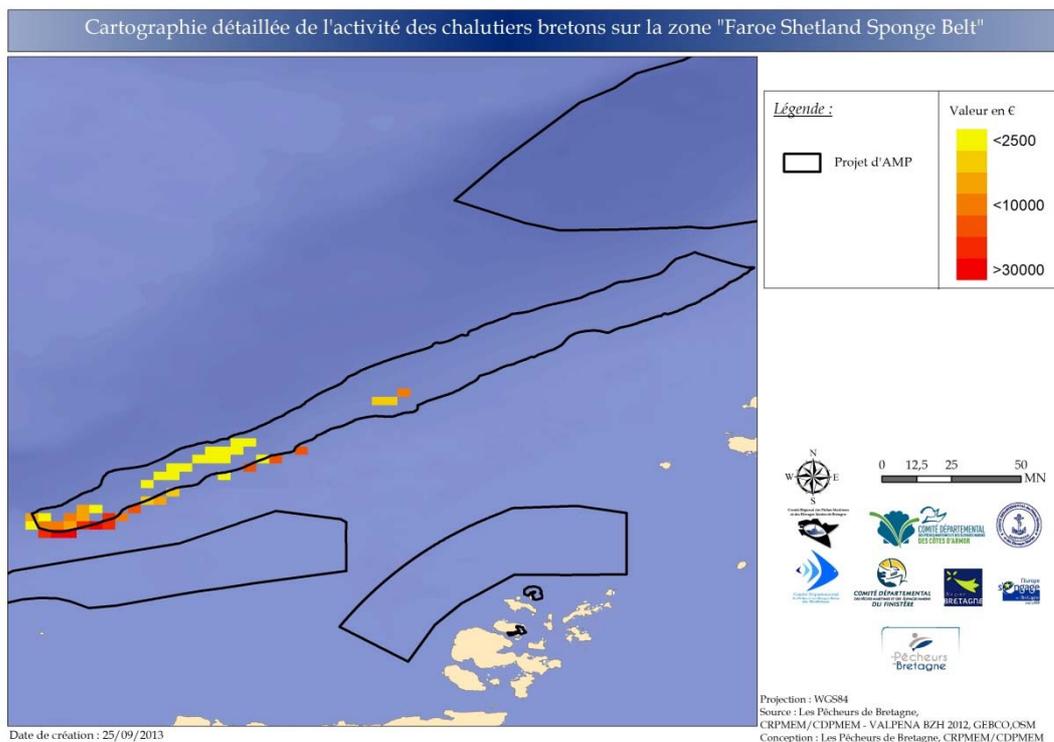
Figure 1 : Cartographie de la zone proposée

Socioeconomic Assessment:

Yes  No

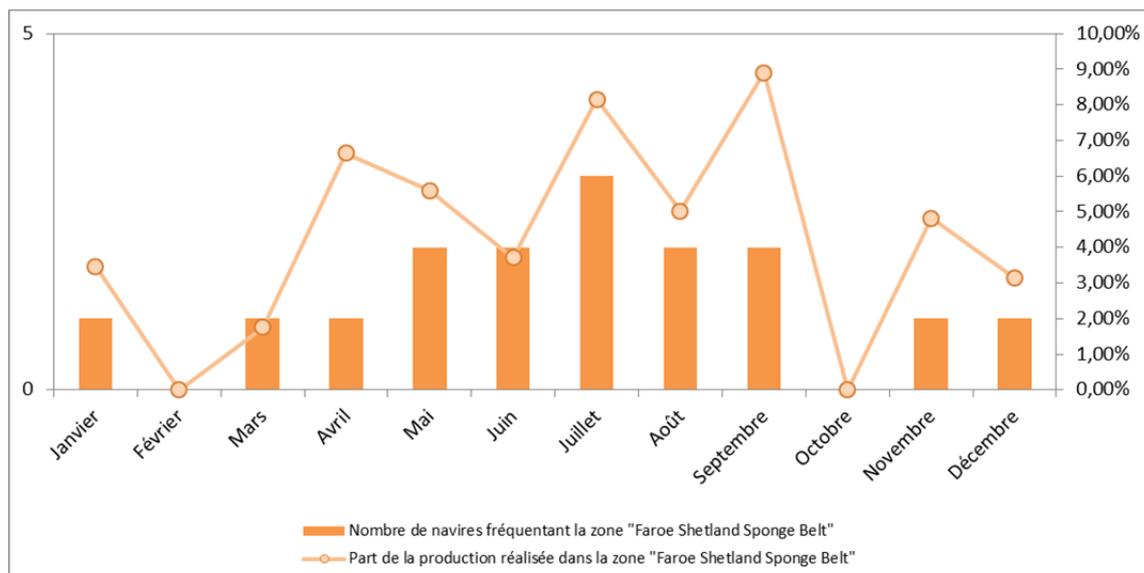
## Presentation of French fishing activity

According to the figure 2, in the “Faroe Shetland Sponge Belt” area, the activity of Breton’s trawlers is localized on the southern limit of the area (Fig. 2).



**Figure 2: Cartographie de l'activité des chalutiers bretons dans la zone "Faroe Shetland Sponge Belt"**

This Breton activity is seasonal with a significant activity of trawlers on the area from May to September (figure 3).



**Figure 3: Nombre de navires bretons et part de la production réalisée dans "Faroe Shetland Sponge Belt"**

Figure 4 represents the mean part in value of each species caught by Breton vessels. In this zone, the main species caught is cutlassfish. During winter, the production is mainly composed of cutlassfish (sabre noir) and hake (merlu). Summer activity is more diversified with saithe (lieu noir) and blue ling (lingue bleue) in addition to other species.

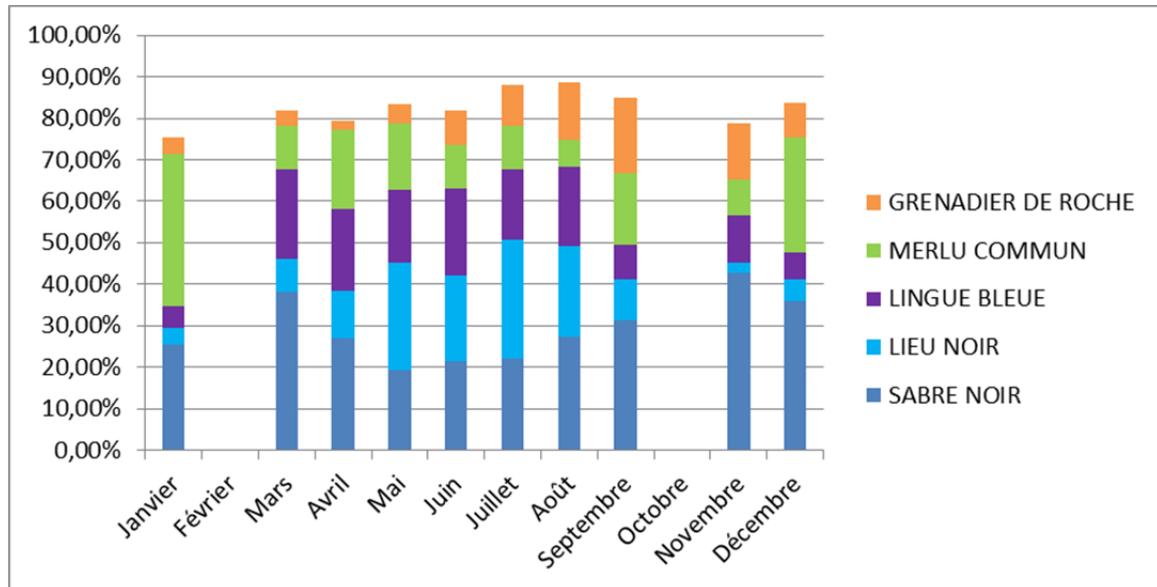


Figure 4: Proportion des différentes espèces de poissons pêchées dans le projet d'AMP "Faroe Shetland Sponge Belt"

The FROM NORD (producers' organisation from the North of France) vessels activity is also seasonal, with a predominance of the otter trawls from the shipping company EURONOR (mainly saithe and hake) (Figure 5). The value for the EURONOR otter trawls is 930 897 €in 2011 and 102 223 €for the other fleets of the FROM NORD.

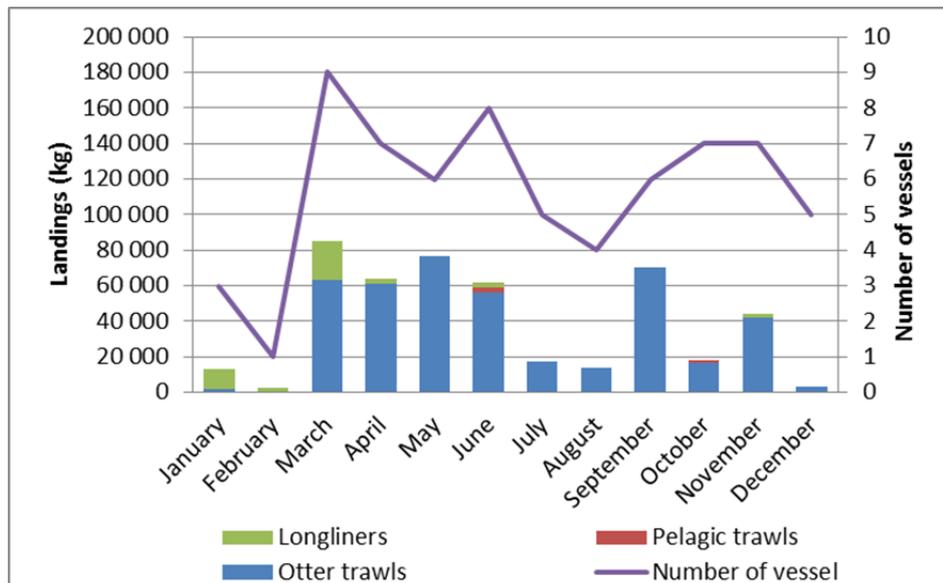


Figure 5: Number of vessels and landings (kg) of the FROM NORD vessels (FROM NORD data, 2011)

All of the above:

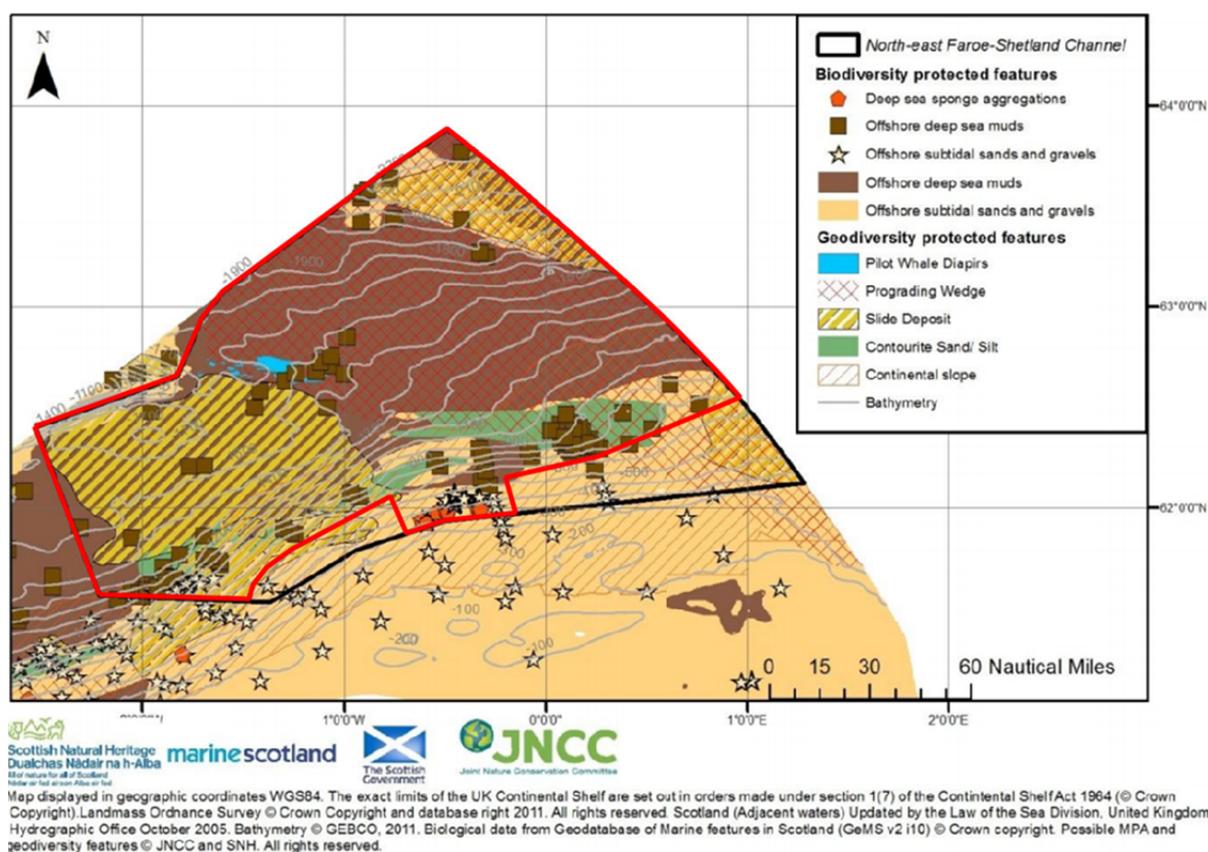
Yes  No

Comments

**15. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-east Faroe Shetland Channel* possible Nature Conservation MPA?**

Designation: Yes X No

According to the Management options paper (July 2013), we understand that a closure to all bottom contact fishing practices is the only way to protect the habitat “Deep-sea sponge aggregations”. Considering the importance of this area for the French fishing activity, and taking into account the habitat “Deep-sea sponge aggregations”, we propose news boundaries for this possible MPA, still allowing to reach the conservation objective for the habitats (figure 6).



**Figure 6: Proposed modification of the boundaries (red line)**

Management Options: Yes X No

Within this possible MPA, the French fishing activity is mainly the one of otter trawls from EURONOR (Boulogne-sur-Mer), on the southern limit of the area. It’s a small part of the possible MPA but represents a very important area for the otter trawls (see socioeconomic assessment).

To “remove/avoid pressures” is the only option that would allow the conservation

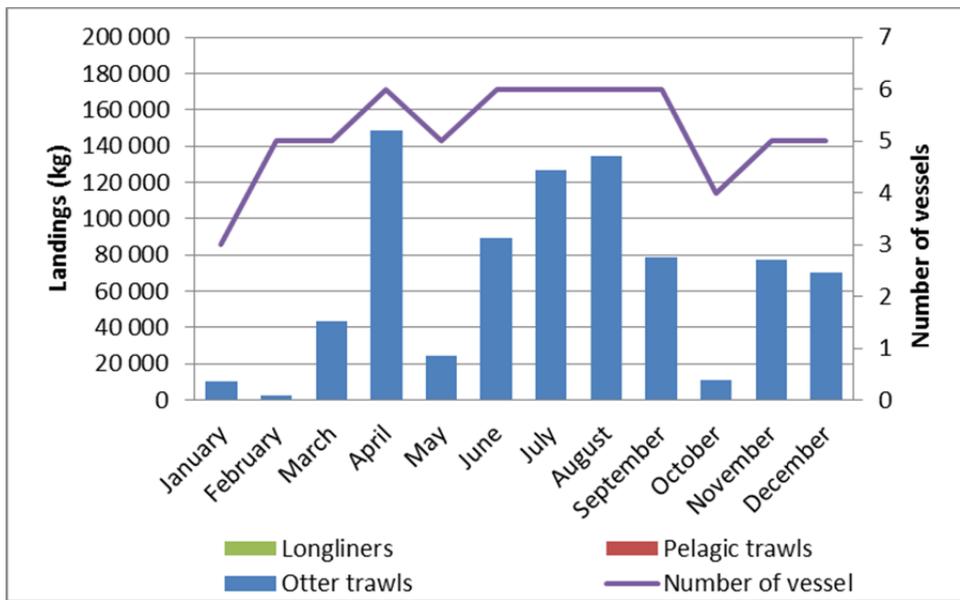
objective to be achieved for “deep-sea sponge aggregations” and would reduce the risk of not achieving the conservation objectives for “offshore deep-sea muds” and “offshore subtidal sands and gravels”

We propose a new shape of the MPA, allowing the conservation objective for the habitats and a better alternative for the French fleet (cf. figure 6).

Socioeconomic Assessment:

Yes  No

The French activity within this MPA is taking place all year long (Figure 7). This activity is carried by the EURONOR fleet, fishing mainly hake and saithe. The annual value of landings in 2011 is 1 791 327 €



**Figure 7: Number of vessels and landings (kg) of the FROM NORD vessels (FOM NORD data, 2011)**

All of the above:

Yes  No

Comments

**23. Do you have any comments on the case for designation, management options and socioeconomic assessment for *The Barra Fan and Hebrides Terrace Seamount* possible Nature Conservation MPA?**

Designation:

Yes X No

The management option paper provides environmental information necessary for the analysis of this area. Thus we examine this document to consider particularly the environmental objectives of this area.

In two parts "management option" and "socioeconomic assessment," we analyze the activity of boats according to environmental objectives.

These different information allow to propose a change in the scope in this area.

Management Options:

Yes X No

The part (in value) of the activity of Breton's trawlers made in the The Barra Fan and Hebrides Terrace Seamount area is important as it represents about 16% during some months.

Fishing activities in the project area are highly concentrated geographically, on the eastern part of the area, especially on a narrow strip of fifteen nautical miles around.

Protection objectives in this area are very specific and the major entity that is subject of the establishment of the zone is the entity "Seamounts".

This geological formation is localized, according to the maps provided by BIM, in the extreme west of the Barra Fan and Hebrides Terrace Seamount area.

Therefore, we wish that a reflexion could be conducted to close only partially this area. Looking at the difference of localisation between the main protected features and areas of activities of fishing vessels, we want to propose to close only the western part of the area and to keep fishing activities allowed on the east side of the area.

Given the above, the change requested by the representatives of French fishermen is the following. The first proposal (green one) is preferred by French fishermen.



### Presentation of Breton fishing activity

According to Figure 9, the number of vessels fishing in the zone is relatively constant throughout the year (between 4 and 6 vessels). The estimated part of the production in value in this zone is important (between 6 and 16% depending on the month).

10 months per year, these vessels are dependant of this zone for 10% of their production.

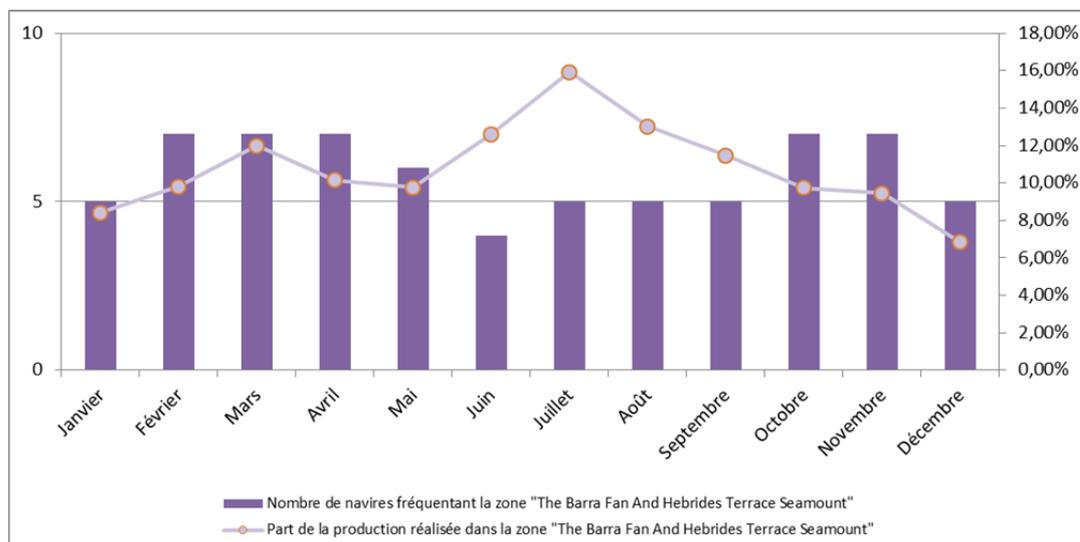


Figure 9: Nombre de navires bretons et part de la production réalisée dans "The Barra Fan and Hebrides Terrace Seamount"

The part of production in value realised by trawlers in "The Barra Fan and Hebrides Terrace Seamount" area is the second largest of all MPA projects in the West of Scotland. The vessel activity in the area is constant throughout the year (fig.10). We can observe a clear seasonality of the type of fishing activity. From December to June, the fishing activity focuses mainly on the species monkfish. Summer and fall activity is focused on round nose grenadier, saithe, cutlassfish.

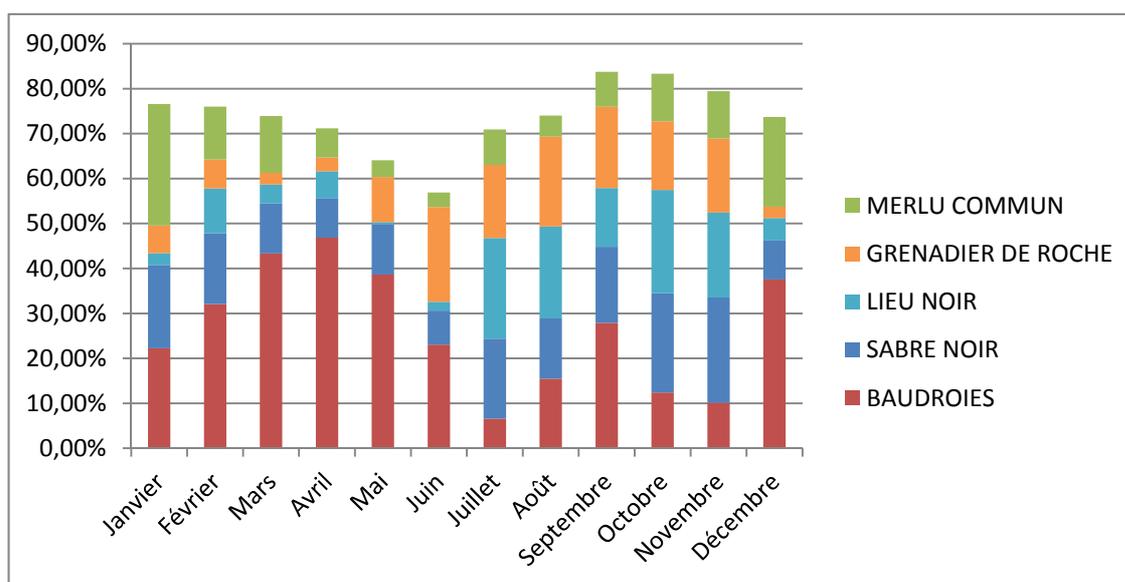
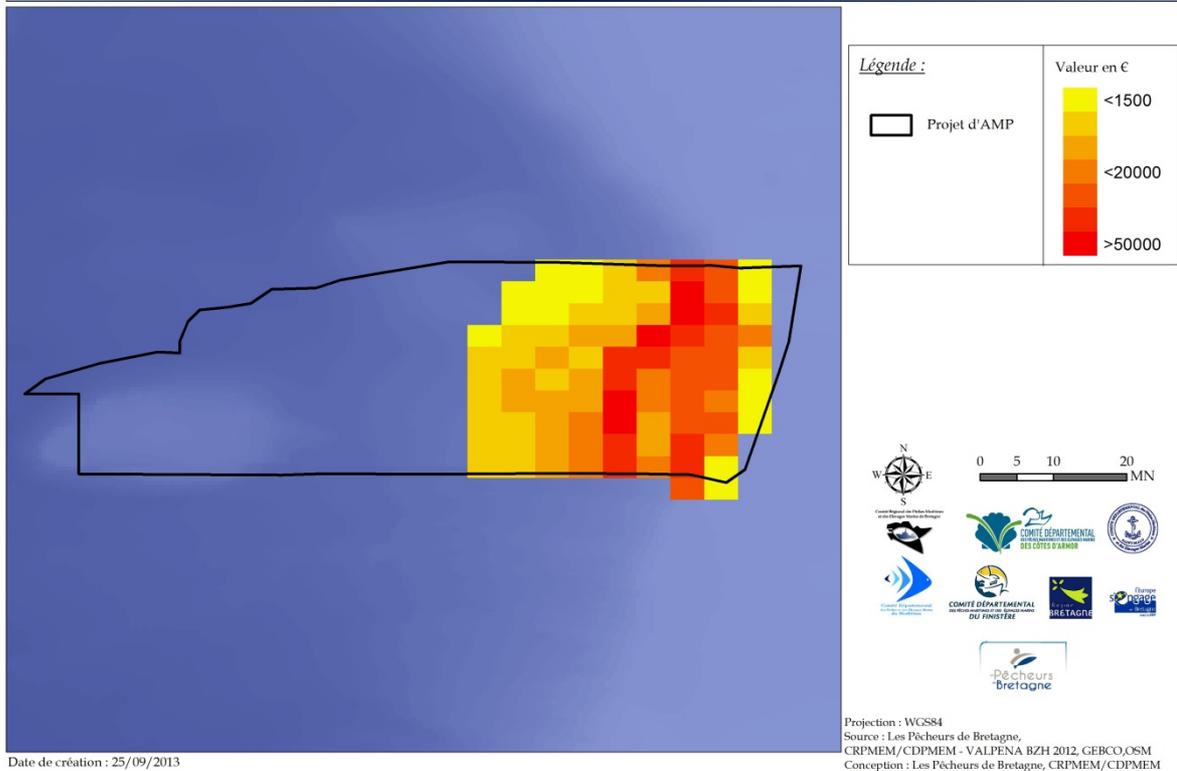


Figure 10: Proportion des différentes espèces de poissons pêchées par les navires bretons dans le projet d'AMP "The Barra Fan and Hebrides Terrace Seamount"

The map 11 represents the production in value close to “The Barra Fan and Hebrides Terrace Seamount. This activity is located in the east of the zone, called in France: “zone des accores”.

Cartographie détaillée de l'activité des chalutiers bretons sur la zone "Barra Fan and Hebrides Terrace Seamount"



**Figure 11: Cartographie de l'activité des chalutiers Pêcheurs De Bretagne dans la zone "The Barra Fan and Hebrides Terrace Seamount"**

Two habitats are present on the fishing activity zone: “deep sea mud” and “continental slope”. It is important to notice that the protection objectives of this last feature are described as not being affected by the usage of trawlers.

The representatives of Breton fishermen wish to point out that potential habitat orange of roughly reported in the eastern part of the area do not seem relevant to them under the protection of this species. Indeed, before the application of a zero TAC, ships encountered individuals of this species in the western part of the area, only on habitat "Seamount".

All of the above:

Yes  No

Comments

## **Choices to represent features in the MPA Network**

**32. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V, do you have a preference or comments on the following combinations to represent these features:**

South-West Sula Sgeir and Hebridean slope

Or Geikie slide and Hebridean slope

These two areas have the same habitat protection objectives, so management paper option specifies that a single area will be sufficient to achieve the objectives of protection. We focus our discussion on this choice.

### *French fishing activity in Geikie slide and Hebridean slope area*

Presentation of French fishing activity is detailed in the next question.

The area Geikie slide and Hebridean slope is mainly fished by Breton's trawlers, but some vessels from the FROM NORD fish there too. The activity is characterized by a large share of the production of these vessels made in the area.

The production value of the Breton's vessels in this area, reached an annual average of nearly 10%.

Fishing activity is present throughout the year with a succession of different activities during the year (hake, monkfish, cutlassfish). The activity realized in the area is important all year long. However the activity does not affect the totality of this area but the western half.

### *French fishing activity in South-West Sula Sgeir and Hebridean slope area*

The activity of the Breton's fleet in the South-West Sula Sgeir and Hebridean slope zone is less important considering the turnover. Actually, the fish production from this zone never reaches 5% of the total value of the boat production. The presentation of French fishing activity is detailed in the next question.

The different type of activities carried during the year in this zone is the same as those observed in Geikie Slide: a constant activity during the year.

As the two zones are proposed for the same goal, the designation of both areas is not necessary.

Looking at the social-economic issues for the West Scotland fleet, it seems obvious that the Geikie Slide zone cannot be totally closed to fishing activities. This zone presents the majority of habitat points from offshore deep sea mud and burrowed mud zones. However, the main fishing activity is situated in the east half of the zone.

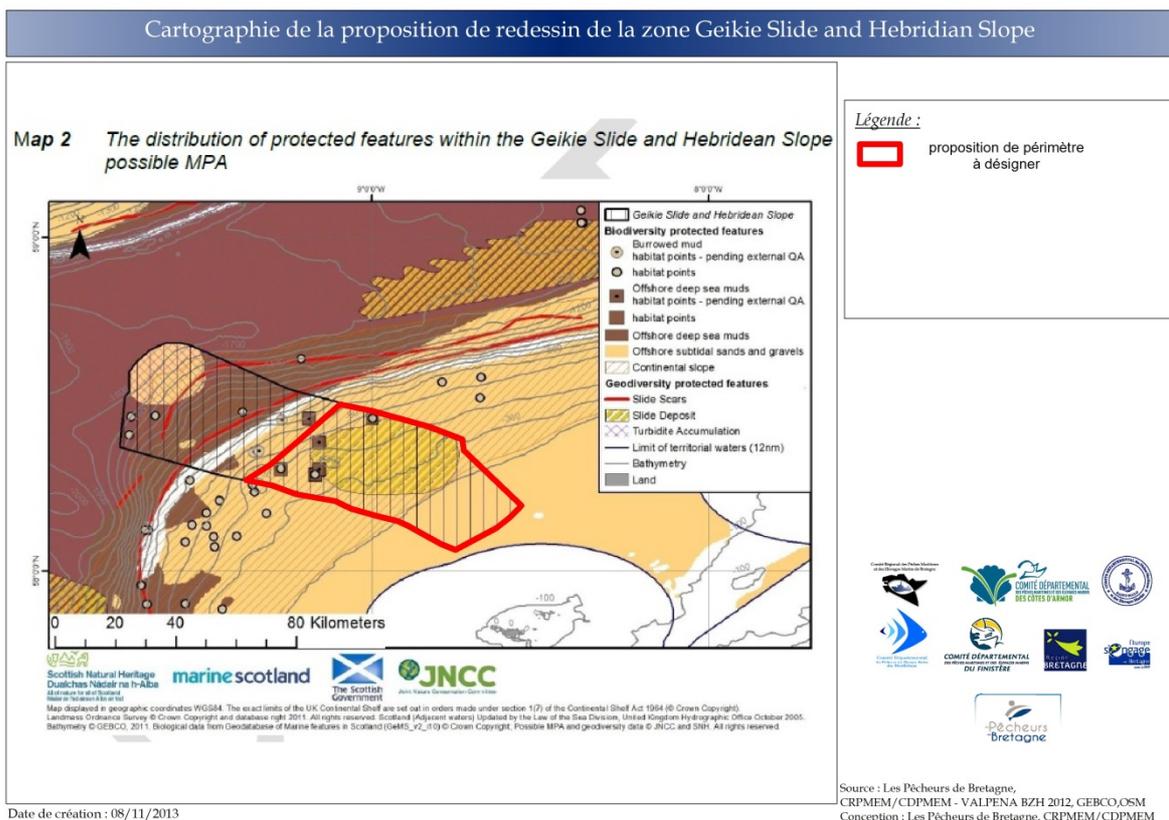
The « South-West Sula Sgeir and Hebridean slope » zone shows a high density of habitat points with protection criteria in the east part of the zone. Moreover, we want to underline the fact that in the « South-West Sula Sgeir and Hebridean slope » zone, the activity from the trawling Brittany fleet is realized on a narrow zone, west side from the zone with Continental Slope habitat. Objective protections for this habitat are described as being not impacted by trawling activities.

Even if three habitat points called « deep sea mud » are located in the trawling activity zone, they are not located in a zone where the activity is important.

French fishermen are aware that the Scottish government is taking as far as possible into account the social and economic issues during the designation of these two important zones regarding the fishing activity.

For this reason, we want to submit the proposal for designing both zones with a modification of the two perimeters, in order to maintain the fishing activity in this maritime space.

Looking at the fishing activity localization in the two zones, it looks interesting to study a partial designation in each zone. Thus you'll find our proposal for modifying the two perimeters on the figures below:



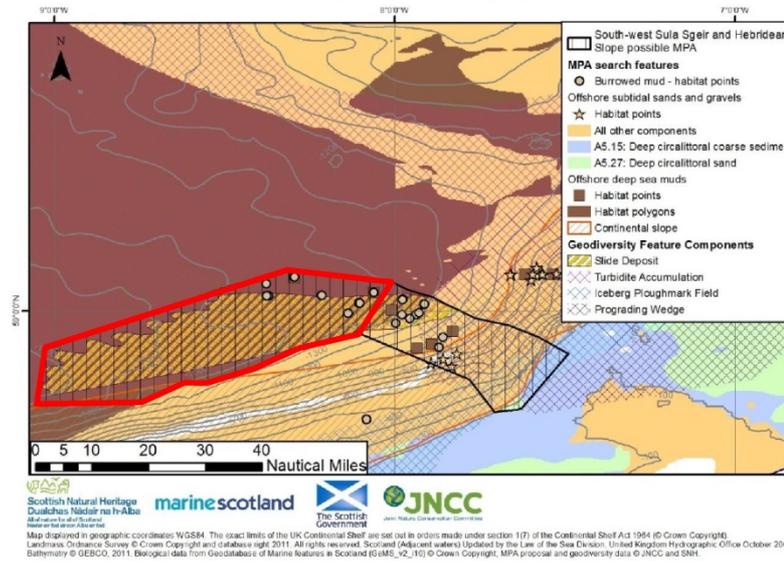
**Figure 12: Proposed modification of the boundaries (red line)**

But if only one designation must be done, it's necessary to maintain the French fishing activity in the « South-West Sula Sgeir and Hebridean slope » zone, with different management measures in the east and in the west side.

This proposal will maintain the protection level required in the management option paper. Looking at this option, closing the west part of the zone could be possible with the opportunity to fish in the east part.

Cartographie de la proposition de redessin de la zone South-West Sula Sgeir and Hebridean slope

**Map 2** The distribution of protected features within the South-West Sula Sgeir and Hebridean Slope possible MPA



**Légende :**  
 Proposition de périmètre à désigner



Date de création : 08/11/2013

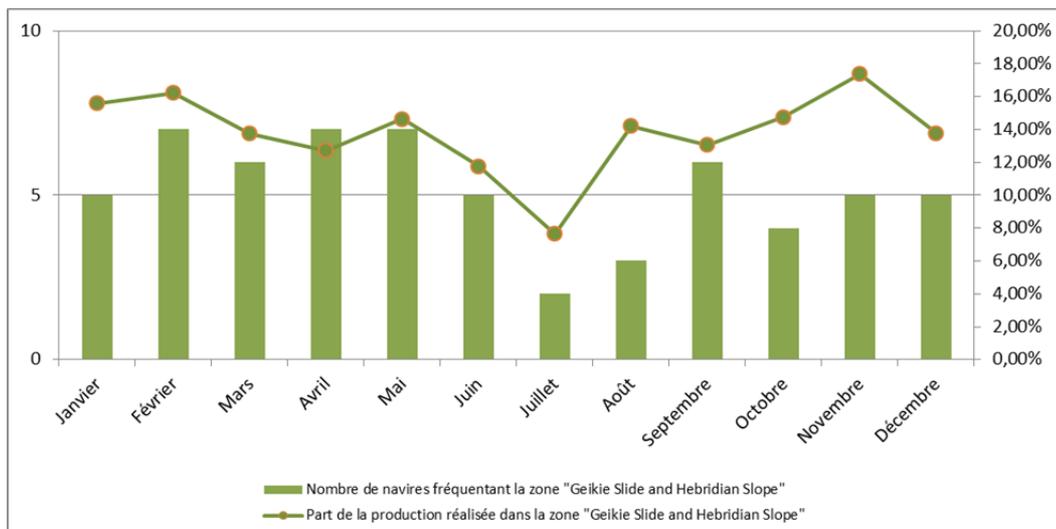
Source : Les Pêcheurs de Bretagne, CRPME/CDPME - VALPENA BZH 2012, GEBCO, OSM  
 Conception : Les Pêcheurs de Bretagne, CRPME/CDPME

**Figure 13: Proposed modification of the boundaries (red line)**

**33. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V?**

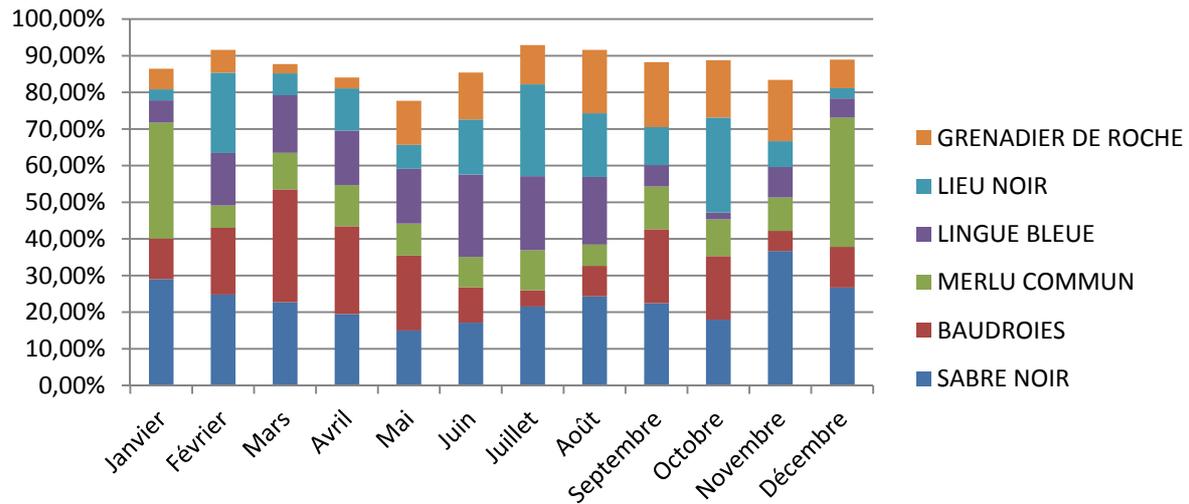
*Presentation of French fishing activity in "Geikie Slide and Hebridian Slope" area:*

Trawlers fish all the year in this zone. The part of the production in value is the most important of all projects of MPA in West Scotland: 15% of value is produced in this zone. Trawlers are very dependent on the activity realized in this zone (figure 14). We observe a seasonal activity.



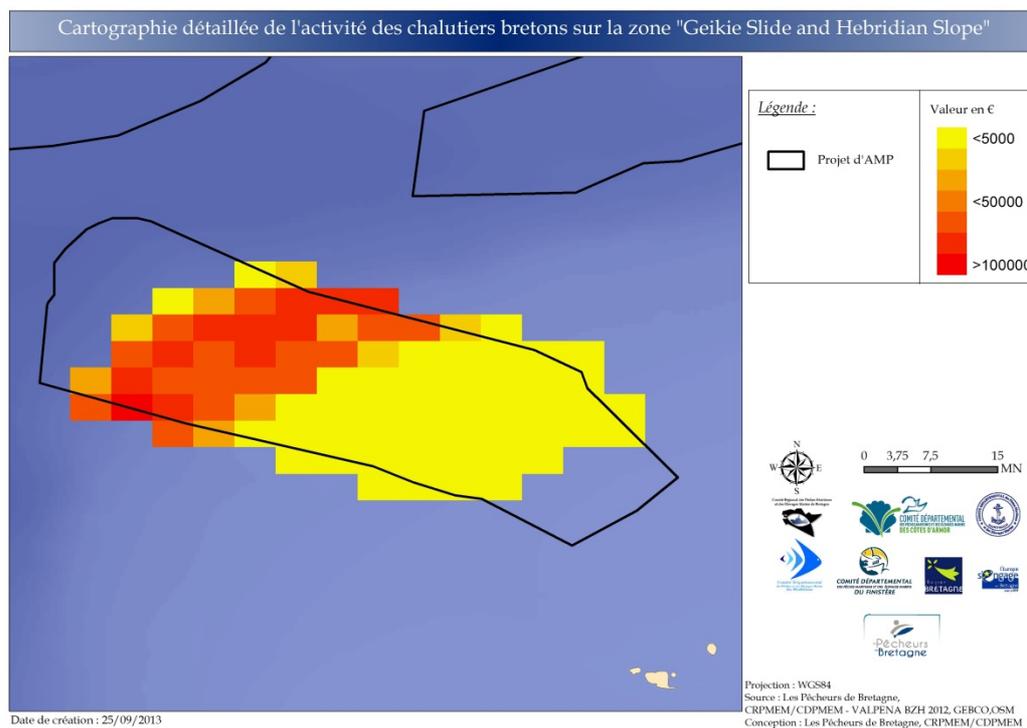
**Figure 14 : Nombre de navires et part de la production réalisée dans la zone "Geikie Slide and Hebridian Slope"**

During winter months, the cutlassfish (Sabre Noir) is the species whose estimated value is the highest in the zone. This species represents a very high percentage of the value produced in the area. During Spring, monkfish is a very important part of the value produced by the vessels, from 20 to 30% of the value produced in the area values. During Summer, the activity is focus on the saithe (Lieu Noir) (about 20% of turnover)(figure 15).



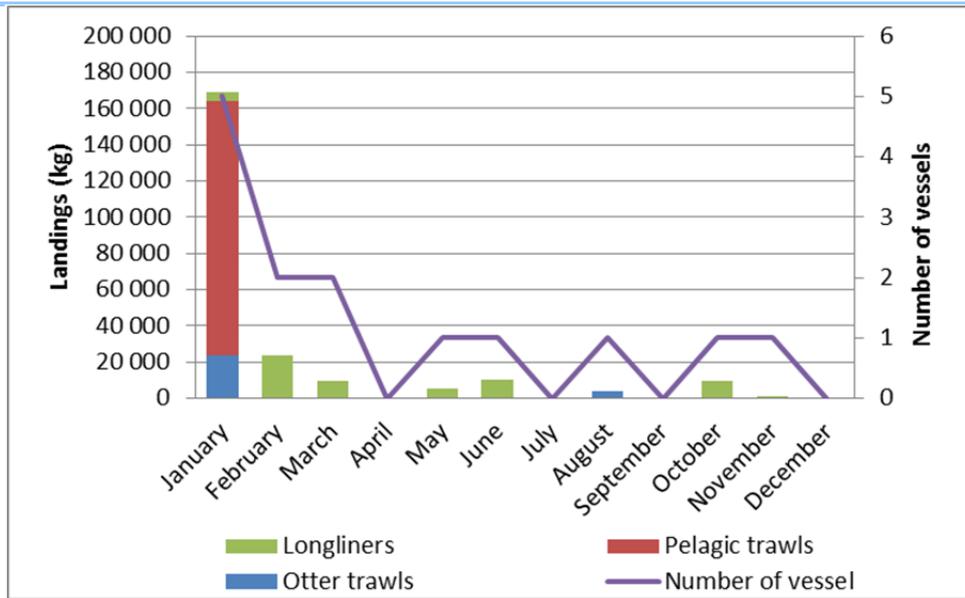
**Figure 15: Proportion des différentes espèces de poissons pêchées par les navires bretons dans le projet d'AMP "Geikie Slide and Hebridian Slope"**

Figure 16 presents the activity of trawlers (members of the Producers' organisation Pêcheurs de Bretagne). The fishing activity is mainly localized in the eastern half of the area, corresponding to the edge of continental shelf.



**Figure 16 : Cartographie de l'activité des chalutiers Pêcheurs de Bretagne dans la zone "Geikie Slide and Hebridian Slope"**

The FROM NORD vessels activity is mainly pelagic trawling activity in January, which not affects the sea bed (Figure 17). The value for the FROM NORD fleet is 370 148 €in 2011.



**Figure 17: Number of vessels and landings (kg) of the FROM NORD vessels (2011)**

Entities that are concerned by protection management project and by fishing activity are mainly Deep sea mud with only one important point looking at biodiversity.

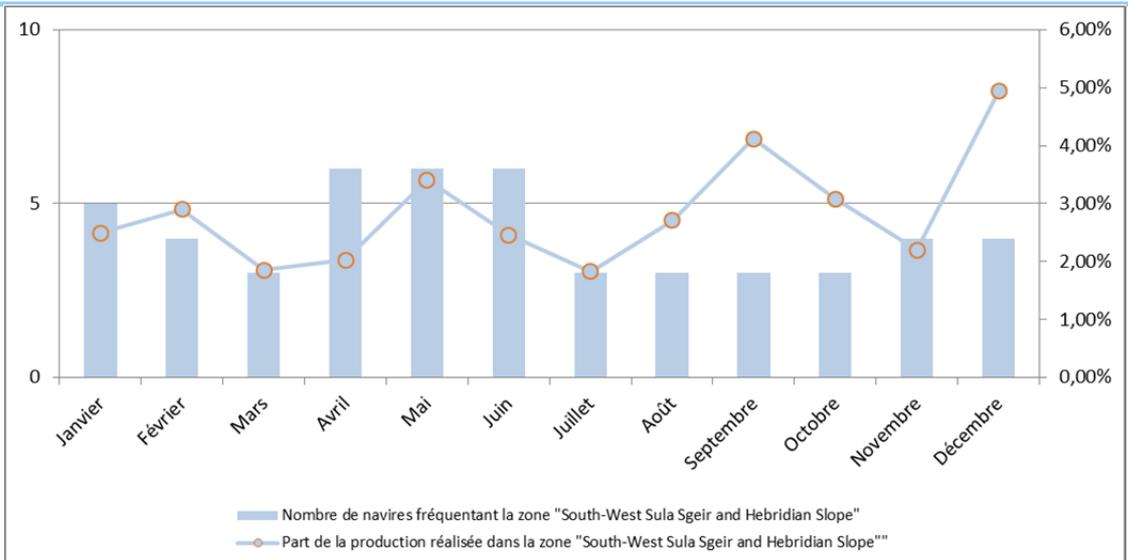
The MPA Geikie Slide is a major zone for the fleet which goes there the whole year, as for the other fishing activities that are carried on this site. Closing this zone will cause strong damage for different fishing activities of the fleet. Looking at the caught variability during the different seasons in the MPA, reporting the activity is not possible without big changes.

***Presentation of French fishing activity in “South-West Sula Sgeir and Hebridian Slope” area :***

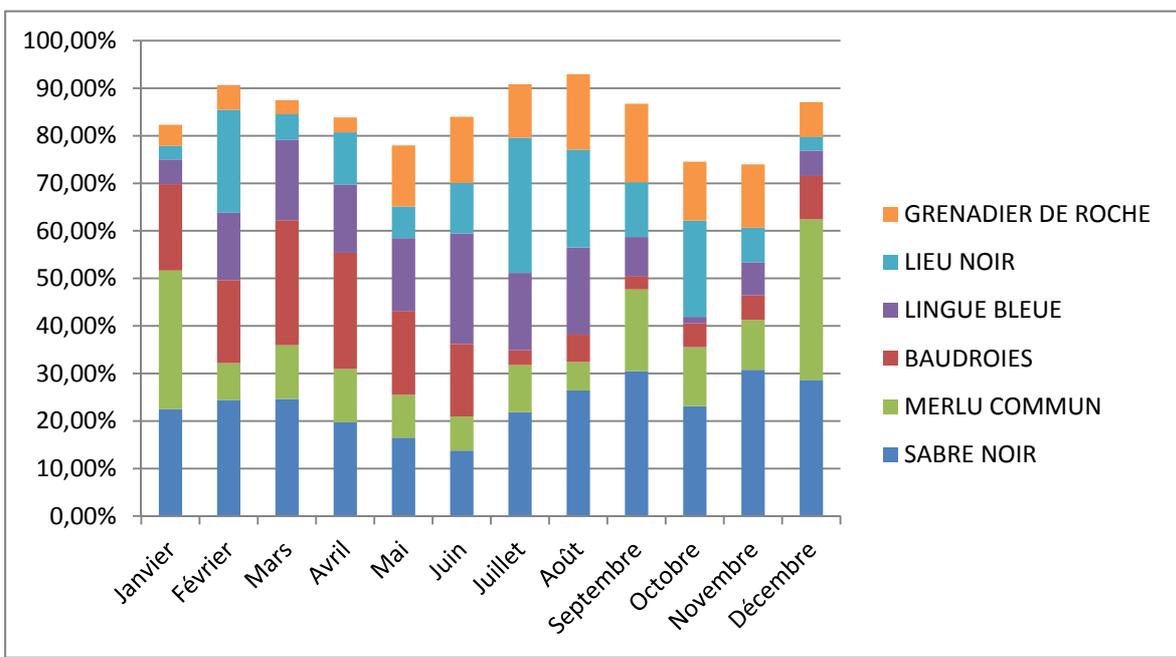
Figure 18 et Figure 19 present the activity of fishing vessel throughout the year.

As in the zone “Geikie slide and hebridian slope”, fishing vessel are present all the year with a different fishing activity (cutlassfish and hake, then monkfish, then saithe and round nose grenadier).

The part of the production in value realized in this zone is between 2 and 5%.



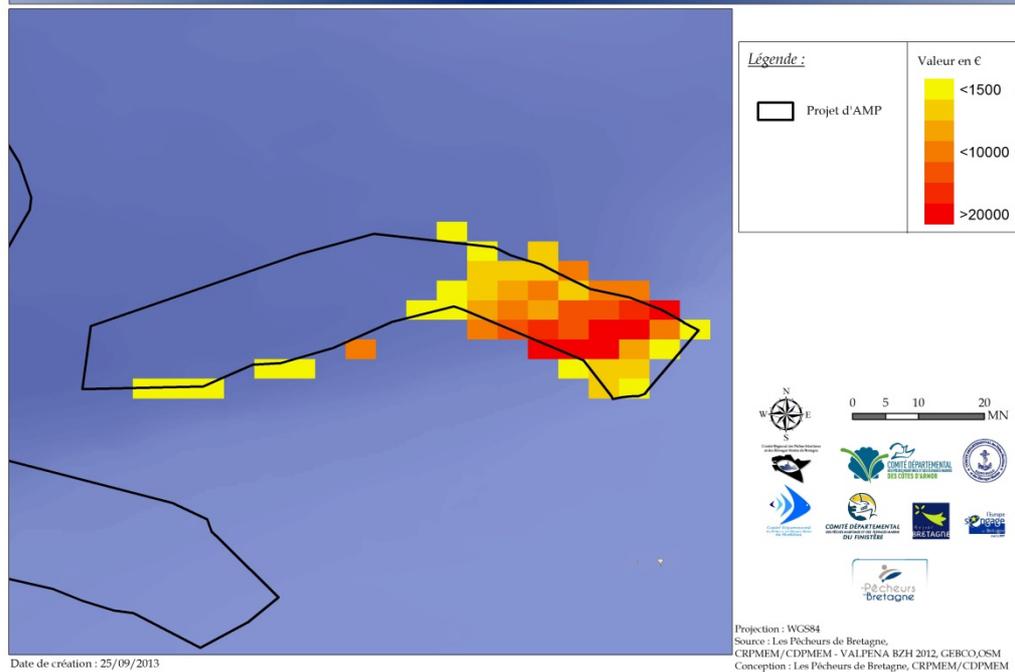
**Figure 18 : Nombre de navires et part de la production réalisée par les navires bretons dans la zone "South-West Sula Sgeir and Hebridian Slope"**



**Figure 19 : Proportion des différentes espèces de poissons pêchées par les navires bretons dans le projet d'AMP "South-West Sula Sgeir and Hebridian Slope"**

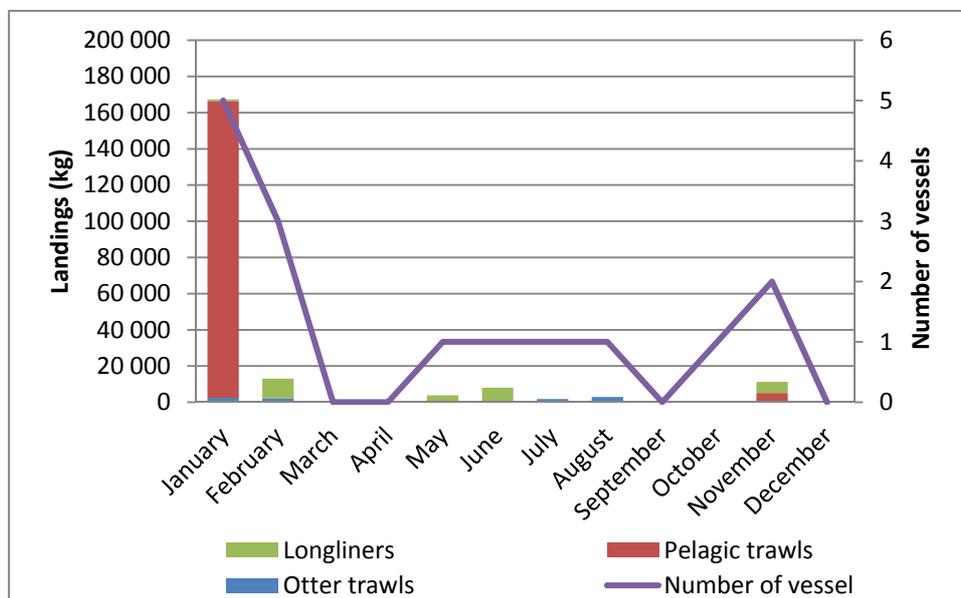
In "South-West Sula Sgeir and Hebridian Slope" area, we observe an activity in western part of this area (figure 21), on the edge of continental shelf.

Cartographie détaillée de l'activité des chalutiers bretons sur la zone "South-West Sula Sgeir and Hebridian Slope"



**Figure 20 : Cartographie de l'activité des chalutiers Pêcheurs De Bretagne dans la zone "South-West Sula Sgeir and Hebridian Slope"**

The activity of the FROM NORD vessels is mainly pelagic trawling in January (figure 22), which not affect the seabed. The value for the FROM NORD fleet is 270 200 € in 2011.



**Figure 21: Number of vessels and landings (kg) of the FROM NORD vessels (2011)**

The type of activity realized in the “South-West Sula Sgeir and Hebridian Slope” area is the same that the activity in “Geikie slide and hebridian slope” area.

The economic importance is lower but it is necessary that fishing vessels continue to work in the eastern part.

## **Final Thoughts**

**35. On the basis of your preferences on which pMPAs should be designated, do you view this to form a complete or ecologically coherent network, subject to the completion and recommendations of SNH's further work on the 4 remaining search locations?**

Yes  No

Comments

**36. Do you have any other comments on the case for designation, management options, environmental or socioeconomic assessments of the pMPAs, or the network as a whole?**

Yes X No

We'd like to reiterate here the preliminary comments made at the beginning of this answer.

The process of designing and managing British MPAs will have very important consequences for French fisheries. Indeed, there will be many sites in the future on the British side (Natura 2000, future MCZs, Scottish MPAs) but also in the waters of other Member States.

The socio-economic impact assessment doesn't take into account the cumulative effects on fishing industry of the several MPAs, but also offshore windfarms projects etc. in the same geographical area. Impacts are looked at site by site but many vessels are concerned by the different areas. These « cumulative » designations will limit the possibility to report the vessels' activities if some additional regulations are implemented on the sites. If the dependence to each area could seem small, several vessels could be obliged to stop their activity because of the regulation adopted in the different sites and because of the cost for adapting their fishing strategy (increase of fishing time and/or transit time, adaptation of the gear or vessel) or unavailability of catch and effort quotas.

Therefore it is essential to conduct a comprehensive study at the scale of all European sites where fishing management measures could be implemented. If the impacts of the measures proposed in this consultation may seem trivial, it can become dramatic once added to those that would be implemented in other MPAs.

It is also very important to take into account impacts not only on the activities of fishing vessels but also on coastal areas and the whole sector: these impacts have not been quantified: in France, it is estimated that one job on sea results in 4 onshore jobs. Furthermore, stopping the activity of a number of vessels could lead to a total deconstruction of coastal areas mainly based on fishing activities. The overall industry concerned by fishing (suppliers, buyers, processors, port services) is very important for the socio-economy of those regions.