

# South West Inshore Fisheries Group

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Marine Scotland  
The Scottish Government  
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Dear Sirs

## **SCOTLAND'S SEAS CONSULTATIONS**

The inaugural meeting of South West Inshore Fisheries Group (SWIFG) took place in November and given the deadline for responses to the above consultations members agreed to consider the proposals in principle rather than provide a detailed response on each specific site proposal/designation.

Marine Planning, Marine Protection Areas and Renewables were considered and key points are presented below.

### **Marine Planning**

This strategic level development proposes three Marine Planning Partnerships (MPPs) within SWIFG's area. Members expect the IFG to be fully involved in these partnerships from the outset and believe they have a place for managing and developing Marine Protected Areas and renewable proposals. It is unfortunate that the planning partnerships are not up and running in advance of proposals for Marine Protected Areas and renewables but instead, are being considered alongside these proposals.

It is important that MPPs are given appropriate allocation of resources to fulfil their roles and that they take account of existing coastal businesses. The fishing industry, as an existing food producing sector organisation, must be included in the MPP as fisheries need protection from proposed developments and in some instances potential exclusion from some of these proposals.

### **Marine Protected Areas (including pMPAs)**

Members recognise the importance of the MPA process and a need to ensure that Scotland's waters, their biodiversity and geodiversity are protected to promote longer term sustainability. Indeed, if designated and subsequently managed properly, such measures have the potential to improve inshore fisheries opportunities among other environmental benefits. However, the proposed MPAs in the west coast cover sizeable areas and a number of aspects of the guiding principles raise concerns.

The statement within proposed MPAs that 'there will be an assumption of multiple-use of a site' is welcomed; it is also understood why 'where activities are not compatible with the conservation objectives of a site they will be restricted'. However, there are serious concerns that in the case of the latter, activities could be restricted where there is a perception of a threat to the proposed conservation measures even when there is a lack of sound scientific evidence to support this as per paragraph 2.5 G. Indeed, the IFG consider that in general the identification of the proposed MPA designations has been done without adequate supporting scientific information. In particular it is believed that third party sources, perhaps with their own vested interests, have provided data on which designations are being proposed. The IFG questions the value of this approach and would expect all data gathered to be done by properly accredited scientific and/or professional bodies. All data must be accurately peer reviewed to ensure its collection and analysis meets current academic and professional standards. Otherwise, people will have no confidence in the data or in the Government's competence to designate sites on the basis of this information. It is the view of members that any proposed site which is currently being considered on the basis of unaccredited scientific data should be withdrawn from the consultation process until robust information becomes available. There is also a belief that sites, once designated, could become subject to controls as scientific evidence accrues though at the time of designation this information will not be available. Again, it is considered that it would be more sensible to acquire scientific details and subsequently designate areas based on sound robust science.

If sites are designated members believe there is an issue with respect to displacement that has not been explored via the consultation and should be done as part of the process. If fishing interests should be denied access to designated areas because of perceived impacts that their historical activities may have there is the potential that this will put environmental pressures on other areas currently not under stress and could have adverse economic outcomes. Potential costs of displacement have not been explored via the consultation process and more details are needed on the socio-economic impacts on the location of MPAs. By way of an

example, the proposed Loch Sunart to Sound of Jura designation includes waters that are a safe haven for fishing, particularly in the winter months, and the full socio-economic implications of any designation and subsequent denial of access to the sizeable fishing grounds by the industry should be completed. The fishing industry has to be seen in light of its food production status and be exempted from exclusions where appropriate.

A further area of concern is the issue of safety as defined under the EU Habitats Directive and how this has a role in terms of the management of MPAs. The safety of people working in areas which become designated resulting in displacement, for example, could have implications but it is unclear how the issue as defined under the above Directive relates to MPAs.

Clarity is required on the matter of burrow mud and the comment in the consultation that these habitats are to be found in only four or five of the sites. IFG members believe burrow muds exist in all of the proposed west coast sites.

Members question the competence of the Scottish Government to legislate for MPAs in light of the OPSAR guidelines across the UK, an issue Northern Ireland is believed to have had to address.

The IFG believes that where MPAs are designated their management should be done in conjunction with other marine planning matters though currently it is unclear how this would be conducted. Given that Marine Planning Partnerships will not be fully functional before MPA designations are made there may have to be ad hoc committees established to ensure the inclusion of interests such as fisheries in the management and development of designated sites. Notwithstanding these points, the IFG would wish to participate fully in the management of MPAs as a partner thus ensuring that inshore fisheries interests are properly considered and their needs represented in future developments.

## **Renewables**

A number of proposals for wind, wave, or tidal energy power generation are outlined in SWIFG's area extending from west of Tiree southwards to the Solway Firth. From a fisheries perspective it is believed that these proposals would prevent access to further areas utilised by IFG members and hence reduce fishing opportunities.

Members are concerned that the potential impacts on fishing and the environment in general have not been adequately appraised by government and that plans are heavily skewed towards the development companies. Before any site is approved for renewables the potential impacts of the generators whether wind, wave or tidal on the local fishing industry must be fully assessed by including input from interested parties such as the IFG. Assessments must take account of historic fisheries and how these may be affected as well as the socio-economic impacts on local coastal communities/businesses. The issue of displacement, mentioned under MPAs, is equally applicable in terms of renewables.

In the Solway Firth extensive wind generation facilities currently exist and fisheries interests believe that it would be undesirable to see any further sites adopted for power generation be these wind, wave or tidal. There are concerns that insufficient scientific studies have been done to obtain details on the impacts that existing wind generators have had on the environment of the Solway and its fisheries status. For example, it is believed that there are changes in sand/silt deposits in and around the structures which may have altered the bathymetry and ecology in parts of the Firth. Moreover, access for fishing in the vicinity of the existing generators has been reduced both as a result of the facility as well as the safety zone; fishing opportunities have effectively been lost. The group does not believe that the impact of the existing energy generation facilities in the Solway Firth was examined in detail as part of the scoping exercises such as the SAE, referred to in the consultation documentation. Therefore, such information should be gathered and assessed before any further proposed developments, wind or tidal, are considered. IFG members would prefer that the Solway Firth, as with other areas proposed on the west coast, are not developed as sites for further energy generation in the absence of adequate scientific data. Instead, a detailed study should be conducted to examine the impact that existing energy generating facilities are having on the Solway Firth in and around the site. Such a study could be used to inform future developments not only in the Solway but wider afield too.

The IFG would welcome input to any study in either the Solway or other sites in the group's area and would assist with such accordingly. Similarly, if through this consultation, sites are designated anywhere in SWIFG's for potential renewable developments, the IFG would wish to be fully involved in further consultations/studies it believes would have to ensue before licences were granted to fully develop energy production facilities.

In conclusion, South West IFG has serious concerns about proposed MPA and renewables developments and the impact they could have on the fishing industry. Large areas within the South West IFG could be deemed out of bounds to fishing as a result of these proposals in both the short and longer terms. It is believed that presently, there is inadequate scientific information to support these proposals and nor has the longer term socio-economic impacts of the proposed developments been fully explored. The establishment of Marine Planning Areas will provide an opportunity for local partnerships including fisheries representatives to explore MPA and renewable developments in future. However, as Marine Planning is being considered in tandem with MPAs and renewables the opportunity to plan these current proposals has been lost. South West IFG believes that the consultations on MPAs and the renewables should be withdrawn until robust scientific data is available and the process of local planning has become operational.

Yours faithfully

Chair SWIFG