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Your Ref:

6th June 2011

Scottish Fishermen's Federation

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Seal Haul Out Consultation
Scottish Government
Marine Planning and Policy
Area 1-A South
Victoria Quay
EDINBURGH
EH6 6QQ

Dear Sirs,

Consultation on Seal Haul Out Sites

The SFF as the body representing the nine main fishing organisations in Scotland is pleased to have the opportunity to respond to this consultation on the protection of seal haul-out sites.

The SFF believes it is very difficult to comment on these sites as the Act neither defines the offence of harassment or the management measures for the sites. It would be our contention that the wording of the act needs to very carefully interpreted to avoid creating a totally unfounded classification of harassment. A common sense approach would be to give a presumption in favour of any existing activity to continue rather than be denied access on some spurious notion of protecting seals from harassment.

Since time immemorial there has been interaction between fishermen and seals, but this has not been of a high impact or had a negative effect on the seals. The SFF would be inclined to describe the interaction generally as low impact and almost certainly more beneficial to the seals than the fishers.

There is no doubt in our minds that fishing, in common with many other marine users, such as tourism and sport can co-exist easily with seals as long as their population growth does not outstrip the rest of the ecosystem and their haul out areas start spreading further afield. The SFF would also expect that if there is scientific evidence of the seal population harming the eco-system, some form of management system would be introduced to stop that from continuing.

Members:

Anglo Scottish Fishermen's Association
Clyde Fishermen's Association
Fishsalesmen's Association (Scotland) Ltd

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Orkney Fisheries Association
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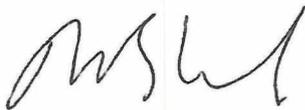
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The SFF would further contend that the aggregation of seals at these proposed haul out sites would be of itself a dis-incentive for many fishers to work in the area. Seals would certainly attack static gear and take the catches, and their voracious appetites would certainly give rise to the perception that fish would be scarce in their vicinity.

The SFF would urge proper use of science to decide when and where seals are in need of protection and clear recognition of the fishing industry's right to pursue its activities without any unnecessary, artificial restrictions being placed on them.

Yours faithfully,



Hansen Black
Chairman
SFF Inshore Sub-Committee