

Call for Evidence for Scotland's Inshore Fisheries Management Improvement (IFMI) Programme

November 2024

Foreword

This Call for Evidence seeks input from people with expert knowledge of inshore fisheries in Scotland (e.g. academics, fishers, national and regional fisheries representatives, eNGOs, seafood processors, coastal communities). We anticipate input to range from papers and data to relaying of personal experience and expert opinion to inform development of this policy.

The Scottish Government's Marine Directorate has an Inshore Fisheries Management Improvement (IFMI) Programme that presents an opportunity to develop a new framework for agile inshore fisheries management. Our vision is that this framework will enable us to tailor a wider range of fisheries management tools to the changing needs of our marine environment and fishers, based on the best available scientific data. Our [Fisheries Management Strategy](#) outlines our commitment to working with stakeholders, and this framework offers an opportunity to strengthen existing arrangements. The IFMI programme will consider a structure that enables a greater focus on strategic decision making both regionally and nationally. It will help us to manage fishing activity within the space available, and consider how responsibility for management and delivery can be shared whilst respecting the ultimate accountability of Scottish Ministers to the Scottish Parliament and the general public.

Following this Call for Evidence, Scottish Ministers have committed to consulting on the IFMI framework in late 2025. Through this call for evidence your experience of Scotland's inshore fisheries will inform the development of the IFMI policy proposal ahead of this consultation.

Wherever possible, please submit evidence to support your answer.

Why

Scotland's inshore fisheries are primarily managed through the UK Fishing Licence framework alongside other mechanisms to deliver a suite of technical measures such as Minimum Landing Size, gear restrictions, quota allocations, etc. However, structures to enable stakeholder input and development of regional variation are currently somewhat limited.

The IFMI Programme was developed in 2024 partly in response to stock assessment advice and stakeholder concern highlighting sustainability issues with our crab and lobster stocks. The programme seeks to consider available management mechanisms to improve the sustainability of these fisheries. Following engagement with our Fisheries Management and Conservation (FMAC) Inshore Subgroup, a selection of interim management measures were implemented to respond to pressure on stocks. This exercise highlighted that additional management options would benefit from some form of regional variation however the framework for developing and delivering them is currently lacking. This has also been echoed by

evidence given to the Rural Affairs and Islands (RAI) Committee in the Scottish Parliament during recent committee sessions¹²³. The RAI Committee evidence reinforced that a more discrete, localised approach to fisheries management carries many benefits. The Scottish Government is therefore keen to explore how a new framework for inshore fisheries management would support the delivery of Scotland's Fisheries Management Strategy along with wider objectives and commitments. Stakeholders have expressed their support for this approach.

Discussions with our FMAC Inshore Subgroup and network of Regional Inshore Fisheries Groups, as well as broader engagement, have highlighted the complexity and diversity of views relating to future inshore fisheries management. We are therefore keen to broaden these discussions to facilitate input from other relevant experts in the topic. Issues raised by the subgroup members have been considered and reflected in the drafting of this Call for Evidence, to ensure we receive the evidence and expert input necessary to inform development of this framework.

Parallel to this Call for Evidence, we are currently reviewing other work streams related to inshore fisheries management, including reviews of the existing stakeholder engagement channels (FMAC, RIFG), our May 2024 Interim Measures, and our Operations activity. The outcomes from these reviews will be published prior to the IFMI consultation in 2025 and will form part of our wider evidence base when developing the IFMI framework. They will be considered together alongside wider objectives, priorities and requirements of the Scottish Government (e.g. Scottish Government's Programme for Government 2024-25, National Marine Plan including Regional Marine Planning, The Fisheries Act 2020, etc.)

What happens next?

This Call for Evidence is open for a **12 week** period. The responses received will be instrumental in enabling us to develop a framework more fully based on the received evidence after it closes. We will engage with stakeholders to refine the proposal and consider implementation and monitoring before bringing it to **public consultation in late 2025** to receive views on a final proposal. Following consideration of consultation responses, we expect to begin implementation in late 2026.

¹ [Rural Affairs, Islands and Natural Environment Committee 27th Meeting, 2022 | Scottish Parliament Website](#)

² [Rural Affairs and Islands Committee 20th Meeting, 2024 | Scottish Parliament Website](#)

³ [Rural Affairs and Islands Committee 27th Meeting, 2024 | Scottish Parliament Website](#)

Responding to this call for evidence

This Call for Evidence will be open from 26 November 2024 and closes on 18 February 2025. Please respond to this call for evidence using the Scottish Government's consultation hub: "Citizen Space". You can access and provide your evidence [here](#).

You can save and return to your response while the Call for Evidence remains open. Please try to answer all the questions. If you are unable to answer any particular question, please feel free to move on to the next. Please note that you will be asked to explain the reasons for your answers with regards to some of the questions on the Citizen Space hub.

How to make an enquiry about this Call for Evidence

If you have any queries about this consultation please contact the Scottish Government's Inshore Fisheries Team at: inshore@gov.scot.

Handling your response

If you respond using the Citizen Space hub, you will be directed to the 'About You' page before submitting your response. Please indicate on the 'Respondent Information Form' how you wish your response to be handled and, in particular, whether you are happy for your response to be published. If you ask for your response not to be published, we will regard it as confidential and treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and your responses might be subject to Freedom of Information requests.

To find out how we handle your personal data, please see our [Privacy Policy](#).

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made publicly available at [Scottish Government Consultations](#). If you use the Citizen Space hub to respond, you will receive a copy of your response via email.

When the Call for Evidence closes all responses will be analysed and considered along with any other available evidence to help to decide whether and how to progress the IFMI proposal. A Call for Evidence summary report will also be published that will include an anonymised analysis of the responses received and set out the next steps.

Part 1 - You and Your Business

We are keen to understand how views differ between sectors as well as geographically.

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

In order to understand the requirements of a new framework it is important that we understand the strength and weaknesses of our existing national approach, including our existing management tools (e.g. vessel licencing) to inshore fisheries management in Scotland.

Questions

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

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

With our stakeholders, we have a shared vision for sustainable management of our inshore fisheries, as outlined in our [Fisheries Management Strategy](#). Linked directly to delivery of key Scottish Government priorities, this outlines our commitment to sustainable fisheries and includes actions to secure resilience of the fishing industry, support the delivery of a strong relationship between the fishing industry and local communities, and to strengthen our co-management processes. However, what this actually looks like to individuals differs depending on their perspective and position within the sector. To develop a successful model of fisheries management, we therefore need to better understand what success looks like for different stakeholders. We are keen to understand your desired outcomes for our inshore fisheries in the context of a range of themes: economic, environmental and social success.

Questions

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

Part 4 – Regional inshore fisheries management

Priorities for inshore fisheries management differ around Scotland's coast and vary depending on the available fisheries in an area as well as other factors affecting the shared marine space. Although we recognise that some aspects of fisheries management may benefit from a national approach, having a framework that supports regional variation will help enable more flexible management of inshore fisheries in the future.

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)

This Call for Evidence is keen to explore to what extent regional inshore fisheries management could be used in Scotland, whether it could use existing coastline delineations, as well as potential benefits and challenges of various approaches.

Questions

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
 - Neutral
 - Moderately oppose
 - Strongly oppose
9. What should we be mindful of when considering the potential transition to regional inshore fisheries management in Scotland?
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?
11. Please explain why the delineation you suggested above would work better than others? What are potential benefits/strengths of this approach?
12. What are potential challenges/weakness of the delineation you suggested above?

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.

Scottish Ministers are responsible for fisheries management in Scotland. Evidence shows that stakeholder-driven solutions can improve inshore fisheries management, and this Call for Evidence would like to explore how co-management principles could be incorporated into the heart of inshore fisheries governance. We recognise there are a lot of voices in the inshore fisheries landscape, each bringing different expertise, technical knowledge and experience. We are therefore interested to hear how these different voices should play a role in fisheries management at both a national and regional level.

Questions

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

13. What stakeholder groups should be involved and how should each feed into development of inshore fisheries management measures?
14. What checks should be put in place to ensure transparency, fairness and accountability when appraising inshore fisheries management options?



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