

Marine Scotland – Inshore Fisheries Pilots – Proposal Form

Please note:

- **Proposals should be completed on the appropriate form in line with the accompanying guidelines with supporting information as may be required.**
- **The selected area must be within the Scottish Marine Regions (<http://www.gov.scot/Topics/marine/seamanagement/regional/Boundaries>).**
- **Please be aware that Marine Scotland would expect Proposal Forms submitted to be made publically available.**
- **Proposals should be submitted to Marine Scotland by 30 September 2017.**

Details

Group/organisation name	WCRIFG Mull Project Work Group (Management Group)
Principal contact name	Alastair McNeill
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Postcode	
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Proposal Questions

1. Who is the recognised lead on the proposals, i.e. who is the primary point of contact?

Alastair McNeill on behalf of the group in 2 below

2. Please provide a background on the group proposing this pilot?

A work group of the WCRIFG Mull & Argyll Subcommittee comprising fishing representatives from the static and mobile sectors, Argyll & Bute Council, SNH and Marine Scotland

3. Please summarise your proposal, including other options that you have considered?

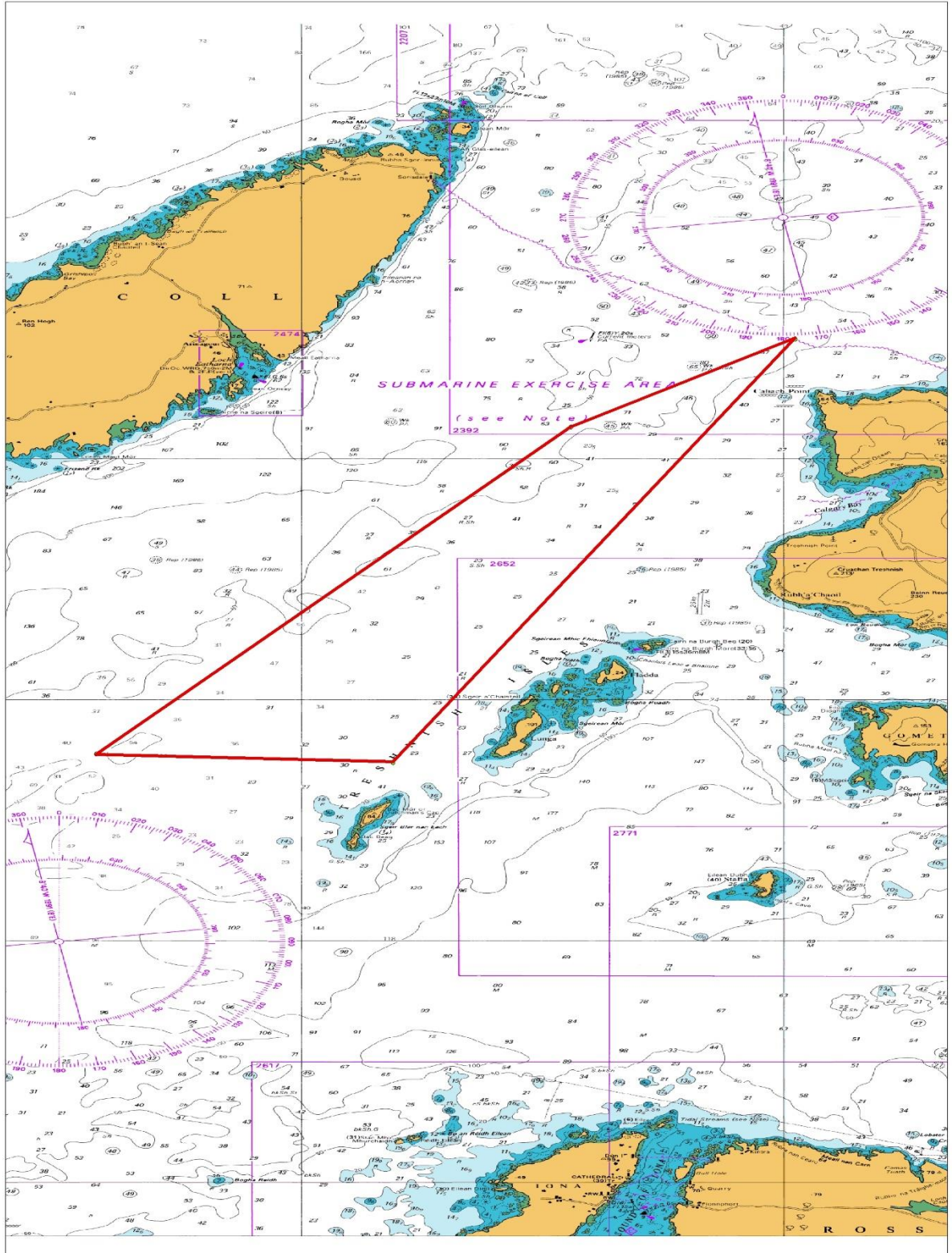
The proposals seek to identify and manage an area hereinafter referred to as a crabbing zone for the purposes of ensuring that, a) it is fished sustainably for brown crab by limiting/controlling static gear effort and, b) protected from other commercial fishing activities during the period of year when the habitat of the zone is colonised by brown crabs to ensure the longer-term sustainability of static sector fishing. The proposals shall apply for a four months period annually from the 1 October until the 31 January. The proposals have taken cognisance of a suggestion that no static gears should be deployed for up to 2.5 miles in waters surrounding the crabbing zone during the above four months period namely the 1 October – 31 January. However, applying the 2.5 miles condition would have serious negative adverse impacts on static gear fishing activities in small but important areas close to the shore where mobile sector vessels historically do not visit and nor has gear conflict ever been an issue. The crabbing zone proposals were included as a 'crabbing box' in the WCRIFG report for Measures in Waters West of Mull submitted to Marine Scotland in April 2017 before the pilot project process was introduced. After the pilot project process was announced, there was further discussion within the WCRIFG work group which concluded that the crabbing proposals should be submitted as a pilot project in the belief that they 'fit' the criteria defined by Marine Scotland whereas the scallop management measures of the WCRIFG Report (April 2017) could be implemented if agreed appropriate by Marine Scotland without making a pilot project application as they are similar to the Scallop Management Proposals reported in August to Marine Scotland for waters south of Mull. Therefore, the scallop management measures comprising part of a strategy for this species in west coast waters, will be resubmitted to Marine Scotland in a separate report and not included as part of this pilot project application which relates solely to the crabbing zone.

4. Please indicate clearly the geographical area you wish to propose for consideration as a pilot area (please provide a chart/image clearly defining the area).

The Crabbing zone lies west to north west of the Treshnish Isles and the co-ordinates for the proposed area are as follows:

	Degrees Decimal Minutes (WGS84)	Decimal degrees (WGS84)	XY (OSGB)
NE corner	56 37.46N 6 19.83W	56.624 -6.331	134444 756408
NW corner	56 35.62N 6 24.50W	56.594 -6.408	129510 753374
SE corner	56 28.68N 6 28.17W	56.478 -6.470	124866 740724
SW corner	56 28.85N 6 34.33W	56.481 -6.572	118613 741471

Please see map below



WGS84

0 1.25 2.5 5 Nautical Miles



N



5. How would you categorise your proposal. If you feel that none of these options are applicable please select 'Other'.

Localised approach to fisheries management

Separating different methods of fishing

Other

6. Are you aware of any statutory or voluntary arrangements already in place within your proposed pilot area?

No statutory measures insofar as the proposals are concerned though voluntary gear conflict measures have been attempted previously but concerns remain in this regard and there are fears that the crabbing grounds could be permanently lost.

7. Please outline any interaction you have had with the relevant Regional Inshore Fisheries Group (rIFG) in the development of this proposal?

The proposal was developed via the WCRIFG by way of subcommittee meetings, a workshop followed by work group meetings. Verbal reports to the full WCRIFG and a final written report to the full WCRIFG inviting comments and which also included scallop management measures was done. Subsequently in April 2017 a WCRIFG report was submitted to Marine Scotland who in turn responded to said report by letter dated 26 June 2017. The proposals are contained within an objective in the WCRIFG Fisheries Management Plan approved on the 19 April 2017. A further WCRIFG Work Group meeting took place on the 1 September 2017 when the discussion focused on the crabbing zone. After further consideration by RIFG members following the meeting, it was decided to proceed with a pilot project application for the crabbing proposals and to also resubmit separately the original WCRIFG report for scallop management proposals minus the details pertaining to the crabbing box.

8. What engagement have you had with any other groups or fishers working in your proposed pilot area in developing this proposal?

The proposals were originally included in the report 'Management Proposals in Waters West of Mull' submitted to Marine Scotland last April. Every member of the WCRIFG had the chance to comment on the report and any feedback received was appended to the report. Because Marine Scotland introduced the pilot project application process a further meeting of the WCRIFG Work Group took place on the 1 September 2017 by which time the pilot project criteria were known. The purpose of the meeting was to review the original report together with feedback from other RIFG members. The meeting focused on the crabbing zone as well as the measures

that might be taken and the event included a representative of SWFPA. Suggestions made at the meeting and not included in the original report were discussed and given further consideration post the event. The suggestion was that the proposals may be more acceptable to those that might oppose them if there was no deployment of static gear in waters around the crabbing zone for 2.5 miles during the four months period that static gear fishermen have free access to said crabbing zone. However, applying this condition would prevent static gears from being deployed close to small areas of shores separate from the crabbing zone but that are important creeling grounds and, these areas have never been subject to gear conflict. The 2.5 miles suggestion was seen as being an unnecessary complication that would not add positively to the proposals. Moreover, during the four months period that the crabbing zone will be closed to mobile gears, mobile sector vessels will be able to continue to deploy gears within the 2.5 miles of waters surrounding the zone as this represents areas where no conflicts have previously occurred. Coll and Tiree based fishermen have been kept informed of the proposals by the WCRIFG Chair and fishing colleagues based on Mull.

9. How many fishing vessels do you estimate currently work, both full and part time in the area proposed and how many will be involved in the pilot?

Four creeling vessels currently fish the crabbing zone and the proposals would enable up to a maximum of six static gear vessels to fish the zone. The number of mobile sector vessels fishing the area is not known as it varies each year but because of actions elsewhere it is becoming increasingly targeted by nomadic vessels. Island based mobile sector representatives agree and support the proposals. The crabbing zone is relatively small (10km x 2 km approx.) in terms of the overall surrounding waters available to the nomadic fleet. Other smaller areas where mobile gears are deployed within 2.5 miles of the crabbing zone are generally close to shore and do not clash with mobile sector activities. As a result, no historical problems such as gear conflict have ever occurred in these other areas. Nomadic fishermen argue that they have lost access to a lot of west coast waters due to MPA designations and if they are excluded from the crabbing zone (approximately 10 km x 2km) if it was closed to them for four months each year will add further to the loss of fishing grounds. Island based mobile sector vessels do not perceive the proposals as an issue recognising that the zone will be accessible to them for the other eight months each year.

10. Please clearly set out the management controls you would wish to see for the pilot and the rationale for each control proposed.

Management Measure	Rationale / Possible Positive Consequences	Possible Negative Consequences
<p>Dedication of a zone (a crabbing zone) to manage the sustainable fishing of brown crab during the four months period each year from 1 October until 31 January and to ensure that other commercial fishing activities during this period do not adversely impact the crab fishery or the interests of the small number of static gear fishermen who depend upon the crab resource for a significant part of their annual incomes.</p>	<p>Will allow measures to be established for a time limited period where restrictions applied can be monitored and assessed. The aim of the measures is to limit effort and segregate gear activity in a specified zone with the primary aim of conserving brown crab in order that fishing for this species is sustained for the creelers who traditionally fish the area and largely depend upon it each winter to earn a considerable portion of their annual incomes. The findings will help to inform future fisheries management by demonstrating if the measures implemented in the pilot have the outcomes anticipated or if alternative actions are necessary.</p>	<p>May be seen as 'protectionism' and an attempt to exclude parties from the area. Outcomes may demonstrate that fisheries management by groups comprising industry representatives et al is not a viable management solution. If the project does not proceed there is a very high risk that the crabbing area will be inundated by scallopers resulting in gear conflict and probably the loss of fishing grounds to static vessels, health & safety issues and the loss of the crab resource leading to creel fishermen leaving the industry and adjacent island communities.</p>
<p>Close the crab zone to mobile gears (scallopers) each year from the 1 October to the 31 January</p>	<p>Reduce gear conflict, improve management and health & safety, protect and conserve stocks and ensure the viability of creel fishermen who target the crab population so they are able to continue to seasonally fish stocks that contribute significantly to annual incomes.</p>	<p>As above. Some may object to any exclusion believing that the right to roam is being eroded and amounts to further loss of fishing areas available to the nomadic fleet in addition to those that they believe have been lost through environmental designations.</p>

<p>Limit the numbers of vessels deploying creels for crabs in the crabbing zone to a maximum of six vessels*</p>	<p>Sustainable management and conservation of crabs by preventing saturation by static sector vessels</p>	<p>May be seen as attempting to exclude people who might wish to fish alternative waters despite there being no evidence of 'visitors' seeking to deploy static gears in recent years. See * below but selection will be based on historical fishing of the waters by crabbers</p>
<p>Limit creel numbers per boat (crabbers) within the crabbing box to a maximum of 300 pots per vessel</p>	<p>Effort control to support sustainability and conservation of brown crabs. These measures will be informed during the period of the project by data collected as part of the trials which will give details on the crab population colonising the zone</p>	<p>May mean that some fishermen are restricted in terms of the numbers of creels they currently deploy or could be limited further if information collected during the project indicates over fishing for the species</p>
<p>Open the crabbing zone to mobile gears each year from the 1 February until the 30 September to allow scallopers free uninhibited access</p>	<p>Reduce gear conflict, improve management and health & safety</p>	<p>Loss of potential fishing grounds to static gear fishermen during an eight months period and at least for part of the time (months on either side of the four months period) when crabs remain present in the zone or other species e.g. lobster are caught</p>
<p>Data collection to monitor and determine impacts of the actions</p>	<p>To assess/determine the impacts of the above measures to show the effects they have had particularly in relation to crab fisheries management and protection. Potentially link to ongoing SIFIDS project packages and complement some of this research.</p>	<p>May reveal that some or all measures do not impact as anticipated.</p>

Crab Tagging	Improve understanding of migration habits and help to ensure sustainability of stocks	
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*Note: The proposals should allow for new entrants which based on recent historical local knowledge is unlikely to be significant in terms of numbers.

11. If your proposal involves limiting the number of vessels able to fish in the pilot area. Please outline:

- a. On what basis vessels will be permitted access e.g. method of fishing, vessel size, historical activity in the area (if so what would track record be)?

The zone proposed is fished each year by a small number of boats (four) deploying creels for the purpose of catching crabs. The zone is also targeted by mobile sector vessels for scallops. Members of the work group proposing this project know the crabbers (all are members of the WCRIFG work group) but have also advised colleagues from Coll and Tiree who might potentially fish with static gears for other species within 2.5 miles of the zone. The aim is to ensure that the only vessels able to access the crabbing zone during the four months period are the static gear vessels which have historically fished the grounds for crab in recent years with the exception of allowing a couple of new entrants to participate in the area should any enter the industry during the life time of the project. Static gear vessels will be limited to deploying a maximum number of 300 creels per vessel. Because of the location of the crabbing zone only static gear boats from the surrounding islands have traditionally visited the site. The reason for a total of a maximum of six boats included in the project is to cater for potential new entrants particularly as those people who currently fish the zone for crabs each year are mostly in the younger age group of people in the industry. The aim is to exclude scalloping vessels from the crabbing zone for the four months period that the area is most productive in terms of crabs and contributes to a significant part of the crabbers annual incomes. It is not known why crabs colonise the habitat of the zone during the winter but the congregation of animals supports the small number of people currently fishing the resource and is key to some of them remaining in the industry. Other than the four months period that the crabbers would have free access to the zone, mobile sector boats would have free access for the remaining eight months.

- b. Please outline your rationale for the basis for restricting access as outlined in question 11 (a)?

The rationale for the proposals is to, a) ensure that the small number of static gear fishermen who depend on the zone for a significant part of their annual incomes and who contribute to the fragile economies of the islands are able to continue to fish the grounds when the habitat is heavily colonised by brown crab, b) implement measures to restrict and limit the number of static gear vessels visiting the zone and limiting numbers of creels that can be deployed to ensure sustainability of the crabs, c) to remove gear conflict from the crabbing area and improve health & safety during the period (1 October – 31 January) and, d) preclude mobile gears from being deployed in the crabbing zone for the period 1 October – 31 January to ensure a, b, and c above are achieved. Restricting access to the crabbing area to only a small number of static gear vessels (6 in total) each limited to a maximum creel number (300 each vessel) will help to ensure that the crab fishery remains sustainable. Between the 1 February until the 30 September none of the aforementioned conditions will apply.

- c. Would those entitled to fish in the pilot area be limited to fish there only? If the answer to this question is 'no' please outline why access to other areas is required and why the proposed pilot does not include these areas.

During the four months period from 1 October – 31 January those entitled to fish the pilot project crabbing zone for the purpose of collecting crabs would have access to other though much smaller static gear fishing grounds within 2.5 miles of the zone. These areas are close to shores and there have traditionally been no issues with respect to conflict as mobile sector vessels do not fish these sites. With the exception of these small shoreline areas where static gears are deployed, mobile sector boats would have free uninhibited access to the vaster proportion of the waters comprising the 2.5 miles surrounding the crabbing zone as done presently. Mobile sector vessels (scallopers) would be excluded from deploying gears in the crabbing zone during the four months from 1 October – 31 January but outwith this period would have uninhibited access to the crabbing zone for the remaining eight months of the year. Consequently, mobile sector vessels will continue to be able to deploy gears in the 2.5 miles of waters surrounding the crab zone in areas where which have traditionally been free of gear conflict due to static gears being placed close to the shore as previously mentioned. There may be environmental designations within 2.5 miles of the crabbing zone as the result of MPAs for example, and restrictions imposed on commercial fishing activities by these are already in place and will not be affected further by this pilot project application.

12. How do you propose oversight of this pilot project, should your application be successful? Do you envisage that a steering or monitoring group will be set up? How would this function?

The WCRIFG Work Group which developed the project would become the pilot management committee and would oversee implementation, management and monitoring of the proposals. The group would meet under the chairmanship of the WCRIFG to review progress, monitoring and assessment etc and would wish Marine Scotland, SNH and the local authority to be represented on the group

13. Please outline what you believe the direct and indirect benefits of your proposal will be?

The direct benefits should be a more sustainably managed crab fishery with improved health & safety as well as better security of the resource for those prosecuting the fishery for crabs. The current crab fishermen who are generally in the younger age brackets of those within the industry fear that the crabbing resource they are seeking to manage, which accounts for a significant portion of their annual

income, has become increasingly targeted during the crabbing season by mobile sector vessels. Whilst it is acknowledged that most mobile vessels that traditionally fish these waters honour the presence of static sector boats, incidents have occurred and as recently as two years ago at least one of the static gear fishermen almost ceased fishing because of problems. There are concerns that greater numbers of nomadic vessels are encroaching upon the waters resulting in the crabbing zone becoming more heavily targeted making it difficult, if not impossible, for static gears to be successfully deployed. The increased fishing activity could result in the diminution of the crab population, even though not the target species of the mobile sector, ultimately leading to the loss of the important crabbing grounds defined herein as the crabbing zone. Hence the proposed project has the potential to ensure that these foregoing concerns are prevented from taking place. Other direct and indirect effects will also be an outcome of these proposals. It is known that the crab population congregates in the habitat of the crabbing zone during the autumn/winter period but in the late spring/summer the crabs migrate to other currently unknown habitats. If the winter crabbing areas were lost, static sector fishermen have indicated that there are few alternative options for them to move elsewhere and certainly not one that is as lucrative as the crabbing zone. Given the crabbing zone resource contributes significantly to annual earnings, the sustainability of creel fishing will be in question if it is subject to other commercial fishing activities during the winter period and its longer-term sustainability could be seriously put in jeopardy. The other creeling areas that are mentioned in this application as being within 2.5 miles of the crab zone are in themselves insufficient to sustain the current number of static vessels operating in these waters but rather they are seen as an additional resources to the crab zone as opposed to substitutes for it. The Mull economic report demonstrated the financial benefits of fishing to the Island's economy and though this included fishing by all sectors, the loss of crabbing grounds would negatively impact the static fisheries sector and affect several families who depend upon creeling for their living. If these proposals proceed as a pilot project they will not only help to ensure that younger static gear fishermen remain in employment and remain on the islands but might also help inform aspects of the development of forthcoming Scottish fisheries legislation. Data gathered as part of the proposals will add to current scientific knowledge regarding crabs and may complement works being undertaken by some of the SIFIDS project packages.

14. Please outline any groups who you believe may be negatively impacted by your proposal and why?

Mobile sector vessels will be negatively impacted by being excluded from the crabbing areas for the 4 months period proposed. However, with the exception of small shore line reaches, waters for 2.5 miles around the crabbing zone will be free of static gears. Static gear vessels will lose access to the crabbing zone for eight months which will include some periods when crabs continue to colonise the area or when people may seek to catch lobsters, for example. Crabbers will be restricted in terms of the numbers of creels they may set from each vessel.

15. Please outline the costs of your proposals both in terms of financial costs and resource costs.

If the proposals are accepted there will be a need to hold periodic meetings to review success but as the zone will operate only for a four months period in terms of the primary aim of protecting crab stocks etc this should not incur significant time resources. Detailed records of crab catches by the static gear fishermen involved in the pilot as a means of monitoring will be required. The proposal offers the opportunity to capture information in relation to the crabs such as size, sex, numbers etc. Details collected could complement some of the SIFIDS projects outcomes and potential links to SIFIDS (WPs 2, 3 4 & 5) will be explored if the crabbing project proceeds. The assessment of data accrued from the crabbing area will help to inform current and future management of the site as well as indicating if fishing effort as imposed during the pilot are indeed sustainable. Crab tagging to determine where the crabs migrate when they move from the zone during summer will also be undertaken. Total costs would be £20, 000.

16. Please outline any risks to the successful implementation of your proposals either in terms of the management or the overall return from fisheries impacted?

Other than a natural incident such as crabs failing to recolonise the zone the greatest risk to success might be attempts to breach the proposals by parties not wishing to see the project proceed or potentially demonstrate success. There are fears that the crabbing zone may be seriously negatively impacted during the 2017/18 season before the pilot is up and running if it was ultimately successfully accepted as a project.

17. Do you envisage the pilot management controls outlined in this proposal having any impact (positive or negative) outside of the area detailed in question 2?

The pilot project has the potential to demonstrate alternative management measures with regards to crab fisheries as well as other shellfish species particularly where sectoral conflict occurs, resources are not finite or there are competing demands on geographic areas. Outcomes could define good fisheries management practice and help to inform future fisheries legislation developments as proposed by the Scottish Government by the end of the current parliament. The proposals will incur four months exclusion of mobile gears from the zone but given its relatively small size it is not believed that this will lead to serious displacement issues particularly in comparison to other actions taken elsewhere which are considerably more likely to be the causes of displacement.

18. Do you know of any evidence to help support your proposals? For example research documents, previous schemes, personal records or observations you may wish to provide?

The Mull socio-economic report referred to above showed the value of commercial fishing to the community but otherwise it is not known if any similar project has been undertaken elsewhere though the belief is that this is not the case.

19. Is there any additional information which you have not provided elsewhere in the form relevant to your proposal?

At the meeting of the Mull Work group on the 1 September the chair stated at the outset that as the Mull Report (April 2017), already submitted to Marine Scotland, had been through WCRIFG procedures of consulting all members its contents could be transferred to the pilot project application and resubmitted to Marine Scotland without having to be placed before the full WCRIFG committee for agreement or otherwise again. In any event there was insufficient time to undertake such an action but if Marine Scotland decide that the proposal might proceed it would subject to a consultation process at that stage. It was made clear that the purpose of the WCRIFG Mull and Argyll Subcommittee meeting was to determine if the proposals concur with Marine Scotland criteria for a pilot project and to allow the group to take cognisance of feedback from WCRIFG members to the original report in order to try to address any concerns where possible. During the meeting, the conversation focused on the above crabbing proposals while the scallop management measures were not debated. Following the meeting the crabbers wanted to revisit the proposals and indicated they would advise the WCRIFG Chair if they wished to proceed, which they subsequently did. Accordingly, it is believed that the crabbing proposals meet the criteria of a pilot project as outlined in this application form. Having reviewed the proposals of the original Mull report following the Work Group meeting it is clear that the scallop management measures are very similar to those proposed in the Scallop Management report submitted in August 2017 by WCRIFG for waters south of Mull. Given that it is believed that scallop management proposals could be implemented under current legislation if Marine Scotland agreed they were valid the Mull report will be modified and resubmitted to Marine Scotland. The report will not include the crabbing proposals of this pilot project application.