



Our Ref: MM/BA/dr: 17-39

Your Ref:

23 August 2017

By email:

Cabinet Secretary Ewing - CabSecREC@gov.scot
Cabinet Secretary Cunningham – CabSecECCLF@gov.scot

Scottish Fishermen's Federation
24 Rubislaw Terrace
Aberdeen, AB10 1XE
Scotland UK

T: +44 (0) 1224 646944
F: +44 (0) 1224 647058
E: sff@sff.co.uk

www.sff.co.uk

Dear Cabinet Secretary Ewing and Cabinet Secretary Cunningham,

Alternative employment for Fishing Vessels

As Scotland enters a new phase of offshore development with the expansion of the offshore renewables industry and cabling, it seems a good time to compare and contrast the emergent new relationships with those built between the fishing and Oil & Gas industries (O&G), and to make a point to you about cooperation.

Happily, from the outset, fishing and O&G have managed to maintain, more or less, a co-operative rather than confrontational connection. The fishing industry recognised that oil and gas extraction would inescapably impact operations but saw opportunities to work together and mitigate those influences.

Since 1986 the SFF has provided O&G with vessels and personnel for appropriate work in the UK sector and occasionally beyond. This co-operation was beneficial to both parties but from our side, it helped many of the fleet to remain in business during the difficult period where fishing was necessarily restrained to allow stocks to rebuild. This co-operation has been of long term benefit to the Scottish fishing fleet.

With this long history in mind we have, from the first consultations with wind farm developers, striven to achieve the same co-operative co-existence. The focus of our negotiations has been on mitigation rather than compensation and we have always taken the view that working together with renewables companies was better for all concerned than seeking compensation for the displacement of already established sustainable marine activity.

Members:

Anglo Scottish Fishermen's Association • Clyde Fishermen's Association • Fife Fishermen's Association • Fishing Vessel Agents & Owners Association (Scotland) Ltd •
Mallaig & North-West Fishermen's Association Ltd • Orkney Fisheries Association • Scallop Association • Scottish Pelagic Fishermen's Association Ltd •
The Scottish White Fish Producers' Association Ltd • Shetland Fishermen's Association

VAT Reg. No: 605 096 748

This is particularly relevant as it is the rather lop-sided standard practice for any marine project to compensate static gear vessels for lost opportunity, but not vessels using mobile gear.

The first generation of offshore wind farms are being developed in prime fishing grounds. We therefore see it as important, as with O&G before, and since the work needs to be done anyway, to move towards the scenario where developers employ fishing vessels in appropriate circumstances to mitigate the loss of grounds. It is particularly helpful to use where possible the actual displaced vessels, who will bring *inter alia* local knowledge to the projects.

At the beginning we believed that this was understood by developers, and that they would seek to employ locally registered and crewed fishing vessels.

Unfortunately, the Marine Scotland (Licencing Operations Team) find themselves prevented from using the definition "local" in their licence consent conditions, being able to specify only "guard vessels."

Nevertheless, some developments have been amenable to using appropriately accredited local fishing vessels. However, others have used the licensing condition loophole to employ vessels from elsewhere. In one instance this has given work in the Moray Firth to former fishing vessels owned by Irish companies and destined for the scrapyard, ahead of active local Scottish vessels.

The SFF would therefore seek the Cabinet Secretaries' support in pursuit with Marine Scotland officers of an equitable solution to this problem. To be blunt the present processes are taking potential diversified employment opportunities away from the indigenous Scottish fleet and allowing Irish, Dutch and English vessels to profit from the same work.

Yours sincerely

Bertie Armstrong
Chief Executive
Scottish Fishermen's Federation