

**Ref - 055**

**marinescotland**

[Personal data redacted]



---

14 September 2021

Dear Sir/Madam

**Firth of Clyde – Cod Spawning Closure - Spring 2022/23**

Since 2001, a specific area in the Firth of Clyde has been closed to fishing each year between 14 February and 30 April, in order to protect spawning cod. The Scottish Government has responsibility for the closure which is implemented on a biennial basis via a Scottish Statutory Instrument (SSI). Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers due to the low amounts of cod that they catch.

This letter seeks your views on continuation of the closure in 2022/23, including the exemptions previously provided.

All respondents should be aware of the guidance in Annex B and complete the Respondent Information Form (RIF) in Annex C.

Please see Annex B for details on how we will handle your response.

**The deadline for responses is Wednesday 13 October 2021.**

We look forward to hearing your views.

Yours faithfully

[Name redacted]  
Sea Fisheries  
Marine Scotland

## CLYDE COD SPAWNING CLOSURE SPRING 2022/23

### Objective of the consultation

1. The Scottish Government has made a Scottish Statutory Instrument (SSI) on a biennial basis from 2002-2021 to provide for the closure of a specified area of the Clyde to most types of fishing activity from 14 February to 30 April each year. The purpose of the closure, first established by the EU Fisheries Council in 2001, has been to protect spawning cod in the area. Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod they catch.
2. The Sea Fish (Prohibited Methods of Fishing) (Firth of Clyde) Order 2019 No. 419 provided for the closure regime in 2020/21 and is available online<sup>1</sup>.
3. This consultation seeks views on the continuation of the seasonal closure in 2022/23 including the exemptions previously available.

### Desired aims

4. This consultation document sets out the key issues that need to be considered in determining arrangements for 2022/23, subject to views received in response to this consultation.
5. The Scottish Government is requesting views on the continuation of the seasonal closure by means of an SSI. We are committed to supporting the recovery of cod stocks in Scottish waters and further afield. We wish to sustain appropriate measures that meet as far as possible the following aims:
  - a. to offer effective protection to the local spawning cod stock, as a contribution to the wider recovery of cod stocks; and,
  - b. to complement, as far as possible, other west of Scotland cod recovery or other stock management measures.

### Effectiveness: precautionary approach

6. There has been little sign of improvement in the state of the west of Scotland cod stocks in recent years.<sup>2</sup>
7. As with many area closures of this type, it is challenging to substantiate its precise biological effect. One school of thought is that, since the stock has yet to show significant signs of recovery, it is imperative that the protection offered by the closure, to date, is maintained or even strengthened, because the stock remains vulnerable; on the other hand, some have argued that the closure is not having a demonstrable effect and should therefore be amended or discontinued.
8. The proposed closure area in the Clyde is within ICES<sup>3</sup> Area 6a (West of Scotland)<sup>4</sup> which in 2021 has a bycatch total allowable catch (TAC) of 1279 tonnes for cod and a 2% bycatch limit. The latest scientific advice from ICES for cod in Area 6a states

---

<sup>1</sup> <https://www.legislation.gov.uk/ssi/2019/419>

<sup>2</sup> [cod.27.6a \(ices.dk\)](https://www.ices.dk/cod.27.6a)

<sup>3</sup> International Council for the Exploration of the Sea.

that recruitment of cod has been low since 2001 and that, when the maximum sustainable yield (MSY) approach is applied, there should be zero catches in each of the years 2021 and 2022.

9. In August 2015 a scientific paper entitled “Evaluating the effectiveness of a seasonal spawning area closure”<sup>4</sup> was published in the ICES Journal of Marine Science, focusing on this particular closure area. The results from the study was that whilst the rationale for the spawning closure was sensible, it had no detectable impact on wider cod numbers in the Clyde. The paper concluded that this was probably due to the poor state of the stock when the closure was implemented and the continuing sources of mortality.
10. This paper noted, based on earlier studies, that cod from the Clyde are reproductively isolated, having little detectable exchange with the northern spawning aggregations<sup>5,6</sup>. Genetic evidence also supports this finding, as Clyde cod were found to have a greater similarity to those from the Irish Sea than the cod from the northern aggregations<sup>7</sup>. Irish Sea cod (ICES Area 7a) is also in poor state, with ICES advising catches of no more than 74 tonnes under the precautionary approach. Given the evidence for reproductive isolation it is even more important to have specific management measures in place in the Clyde.
11. More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen’s Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.
12. Taking all of the available evidence into account, the Scottish Government remains of the view that the closure offers some necessary protection to spawning cod at a crucial stage in their life cycle. To remove closure provisions altogether would place cod stocks at unacceptable risk of further depletion, unless appropriate alternative measures were introduced in their place.

### **Ongoing and Future Fisheries Management**

13. The 2019 SSI make provision which achieves the particular requirements of the closure. These provisions provide a degree of legal protection to spawning cod at the correct time and place, whilst allowing for some fishing activities to continue. Furthermore the closure complements other similar closures in the region, including the Irish Sea closure which, since 2001, has taken place at the same time of year as the Clyde closure.
14. In January 2020 the Convenor of the Rural Environment and Connectivity Committee, acting upon representations from The Community of Arran Seabed

---

<sup>4</sup> <http://icesjms.oxfordjournals.org/content/early/2015/08/12/icesjms.fsv144.full.pdf+html>

<sup>5</sup> Wright, P. J., Galley, E., Gibb, I. M., and Neat, F. C. (2006) Fidelity of adult cod to spawning grounds in Scottish waters. *Fisheries Research*, 77: 148-158.

<sup>6</sup> Wright, P. J., Neat, F. C., Gibb, F. M., Gibb, I. M., and Thordarson, H. (2006) Evidence for metapopulation structuring in cod from the west of Scotland and North Sea. *Journal of Fish Biology*, 69: 181-199.

<sup>7</sup> Heath, M. R., Culling, M. A., Crozier, W. W., Fox, C. J., Gurney, W. S. C., Hutchinson, W. F., Nielsen, E. E., Wright, P. J., Calvalho, G. (2014). Combination of genetics and spatial modelling highlights the sensitivity of cod (*Gadus morhua*) population diversity in the North Sea to distributions of fishing. *ICES Journal of Marine Science*, 71: 794-807.

Trust (COAST), requested that the exemptions granted to *Nephrops* trawlers, creel and scallop dredgers were removed from the 2019 and any subsequent SSI providing for the Clyde Cod closure. In response to that request the then Cabinet Secretary committed "...to use the period before the next iteration of the Order (due in force in 2022) to consider the case for the exemptions more closely. Through further consultation with stakeholders, this will consider current science, cod bycatch levels, achieving consistency with conservation measures currently being introduced for cod in the North Sea, and other factors related to Clyde fisheries." EU Exit and the Covid-19 pandemic limited the team's ability to consider and respond to the Convenor's request in 2020; we had intended to consult on this matter in autumn 2021 in respect of the forthcoming SSI.

15. However, on 20 August 2021, the Scottish Government and the Scottish Green Party (SGP) published a shared draft policy programme, setting out areas of collaboration over the current parliamentary term. This document sets out a number of policy objectives which will affect inshore fisheries in Scotland including the Clyde, such as:

- Enhanced fisheries management measures for existing Marine Protected Areas (MPAs) and other key coastal biodiversity sites;
- Designating a suite of Highly Protected Marine Areas (HPMAs) covering at least 10% of Scotland's seas; and
- Additional specific evidence-based measures to protect the inshore seabed.

16. The Scottish Government and the SGP plan to consult as soon as practicable on these policy objectives. It is likely that such consultations will cover the area of the Clyde covered by the forthcoming Clyde cod closure SSI. In order not to forestall and to minimise any overlap with these wide-ranging consultations, this consultation only seeks views on the continuation of the Clyde cod closure measures already provided for, including the exemptions. It is important that there is no gap in these closures to ensure that spawning cod remain protected to prevent further decline to the stock. In the event that the planned Scottish Government and SGP consultations do not cover this area, we will act on the Convenor's request as part of the next biennial consultations.

17. In terms of other ongoing management initiatives, Scottish Ministers committed to a programme of research and practical measures called 'Clyde 2020' to contribute to restoration of the Clyde marine ecosystem. Following the recommendation by Clyde 2020, there are a number of ongoing research projects in the Clyde. As such the Clyde Marine Planning Partnership have been developing The Clyde Regional Marine Plan to ensure sustainable and co-ordinated management of the region. We understand that the regional Inshore Fisheries Group and CFA will input into the CMPP in respect of fishing interests. Further details can be found at the following link: <https://www.clydemarineplan.scot/>

18. Our Future Fisheries Management Strategy<sup>8</sup> makes a commitment to work with our stakeholders to deliver an ecosystem based approach to fisheries management, including considering additional protections for spawning and juvenile aggregation areas in Scottish waters.

## **Proposal for the closure in 2022/23**

---

<sup>8</sup> <https://www.gov.scot/publications/scotlands-future-fisheries-management-strategy-2020-2030/>

19. The proposal on which we are seeking views is to continue **all of the measures which applied in respect** of the 2020/21 closure in 2022/23. Therefore, as in previous years, the 2022/23 closure will provide for fishing restrictions in two areas in the Clyde from 14 February 2022 to 30 April 2022 and 14 February 2023 to 30 April 2023. (Annex A).
20. Area 1 is that part of ICES statistical rectangle 39E4 which lies to the east of the peninsula of Kintyre and to the north of a straight line between 55°18'18" north latitude, 05°38'50" west longitude, and 55°00'30" north latitude, 05°09'24" west longitude.
21. Area 2 is that part of ICES statistical rectangle 39E4 which lies to the north of a straight line between 55°17'57" north latitude, 05°47'54" west longitude and 55°00'00" north latitude, 05°21'00" west longitude and to the south of a straight line between 55°18'18" north latitude, 05°38'50" west longitude and 55°00'30" north latitude, 05°09'24" west longitude<sup>9</sup>.
22. The intention is to protect key spawning grounds (Areas 1 and 2) whilst leaving other areas such as the North Channel and remainder of the Firth of Clyde open with the aim of enabling fishermen to work elsewhere during the closure.

## Exemptions

23. The following exemptions have been provided in previous years:

Area 1: *Nephrops* trawlers, scallop dredgers and creel vessels;

Area 2: Scallop dredgers and creel vessels.

24. For the 2022/23 closure, the Scottish Government proposes to retain these exemptions.
25. The South Arran Marine Conservation Order 2015 No. 437 (MCO)<sup>10</sup> prohibits and regulates fishing activities in the South Arran Nature Conservation Marine Protected Area Order 2014 (MPA). Restrictions contained in the South Arran MCO which overlap with parts of the Clyde cod closure area, will continue to apply in addition to the measures which will be contained in the forthcoming Clyde cod closure SSI. Furthermore, consultations are due to take place regarding fisheries measures for the Clyde Sea Sill MPA in due course, having been delayed by the Covid-19 pandemic. Therefore, in future, should the Clyde cod closure exemptions remain in place, they may not apply in areas within the Clyde Sea Sill MPA where other fisheries management measures may yet be introduced. Finally, as noted above, the proposed continuation of the Clyde cod closure exemptions would be subject to the planned Scottish Government and the Scottish Green party consultations and subsequent policy changes.

---

<sup>9</sup> These are co-ordinates of latitude and longitude according to the World Geodetic System 1984 ("WGS 84"). WGS84 is defined at paragraph 2.1 of the United States National Imagery and Mapping Agency Technical Report TR8350.2, third edition, amendment 1 of 3rd January 2000 entitled "Department of Defense World Geodetic System 1984" (<http://earth-info.nga.mil/GandG/publications/tr8350.2/wgs84fin.pdf>). International Council for the Exploration of the Seas (ICES) standardise the division of sea areas for statistical analysis. Each ICES statistical rectangle is '30 min latitude by 1 degree longitude' in size.

<sup>10</sup> [The South Arran Marine Conservation Order 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

## **Conclusion**

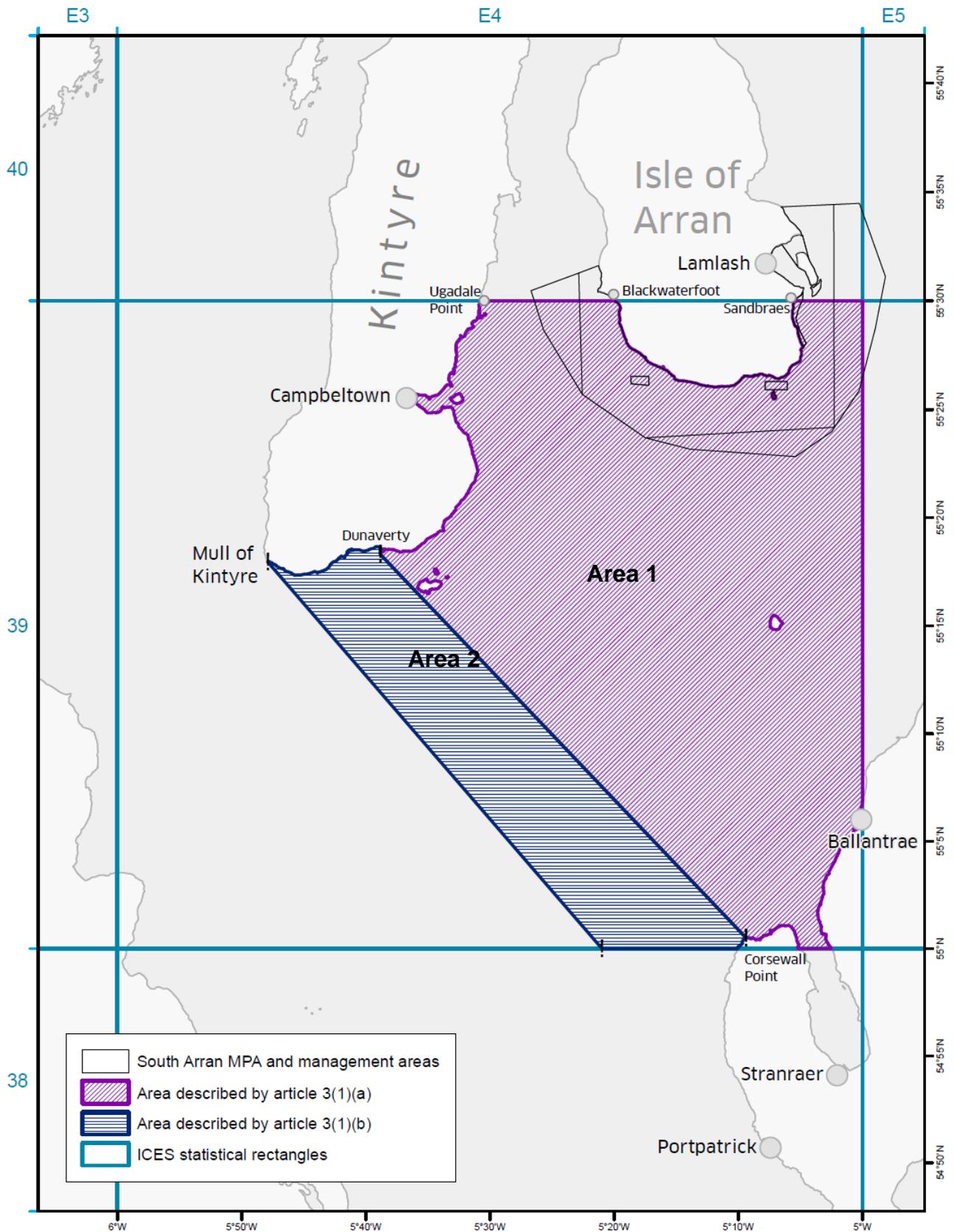
26. The Scottish Government proposes to renew the seasonal closure in the specified area in the Firth of Clyde (see map in Annex A) as in previous years for 2022/23.
27. Views are invited on all issues raised in this consultation paper and responses to the questions posed in Annex C. **We would ask for views to be received no later than 13 October 2021.**

### **What questions does the consultation seek to consider?**

1. Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?
2. Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?
3. Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

# Annex A

Illustrative map of the area.



## **Annex B**

### **Consultation period and responses to the consultation**

This **consultation will run for 4 weeks**, with a **closing date for responses of 13<sup>th</sup> October 2021**.

The consultation Respondent Information Form (RIF) (Annex C) should be completed and sent by email to [Name redacted] at: [Personal data redacted]

### **Handling your response**

We need to know how you wish your response to be handled. Please complete and return the Respondent Information Form which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately.

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review;
- inform the development of a particular policy;
- help decision to be made between alternative policy proposals; or,
- be used to finalise legislation before it is implemented.

Final decisions on the issues under consideration will, if appropriate, also take account of a range of other factors, including other available information. While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process; consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

### **Privacy**

Your responses, which will include personal information, are being processed as a public task. You have the right to object to this processing.

Your information will be held securely on the Scottish Government IT system and will only be accessible by authorised officials.

You have the right to ask for any personal information we hold about you.

We will only collect as much information about you as we need and will not share it with anyone outside of Scottish Government. If we share your responses, we will remove your personal details. We will only store your personal information for as long as we need it.

We will only contact you about your responses if you have given consent for us to do so. If you give consent for us to contact you then you have the right to withdraw that consent and you will no longer hear from us. We will continue to process your response information.

If you are unhappy about how your information is being handled then you can contact our data protection officer [dataprotectionofficer@gov.scot](mailto:dataprotectionofficer@gov.scot).

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (FOI) (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise. In the event of an FOI request, personal details would be redacted.

If you have any comments about how this consultation exercise has been conducted, please send them to the same address as for your response.

**Annex C  
Consultation on the Firth of Clyde Cod Spawning Closure  
2022/23**



**RESPONDENT INFORMATION FORM**

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

**1. Name/Organisation**

**Title** Mr  Ms  Mrs  Miss  Dr  **Please tick as appropriate**

**Surname**

**Forename**

**2. Postal Address**

<input type="text"/>		
<b>Postcode</b>	<b>Phone</b>	<b>Email</b>

**3. Privacy**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**  **Yes**  **No**

**CONSULTATION QUESTIONS**

**Question 1:** Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?

Comments:

**Question 2:** Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?

Comments:

**Question 3:** Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

Comments:

**Ref - 061**

**marinescotland**

[Name Redacted]



**The Scottish  
Government**  
Riaghaltas na h-Alba

14 September 2021

Dear Sir/Madam

**Firth of Clyde – Cod Spawning Closure - Spring 2022/23**

Since 2001, a specific area in the Firth of Clyde has been closed to fishing each year between 14 February and 30 April, in order to protect spawning cod. The Scottish Government has responsibility for the closure which is implemented on a biennial basis via a Scottish Statutory Instrument (SSI). Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers due to the low amounts of cod that they catch.

This letter seeks your views on continuation of the closure in 2022/23, including the exemptions previously provided.

All respondents should be aware of the guidance in Annex B and complete the Respondent Information Form (RIF) in Annex C.

Please see Annex B for details on how we will handle your response.

**The deadline for responses is Wednesday 13 October 2021.**

We look forward to hearing your views.

Yours faithfully

[Name Redacted]  
Sea Fisheries  
Marine Scotland

## CLYDE COD SPAWNING CLOSURE SPRING 2022/23

### Objective of the consultation

28. The Scottish Government has made a Scottish Statutory Instrument (SSI) on a biennial basis from 2002-2021 to provide for the closure of a specified area of the Clyde to most types of fishing activity from 14 February to 30 April each year. The purpose of the closure, first established by the EU Fisheries Council in 2001, has been to protect spawning cod in the area. Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod they catch.
29. The Sea Fish (Prohibited Methods of Fishing) (Firth of Clyde) Order 2019 No. 419 provided for the closure regime in 2020/21 and is available online<sup>11</sup>.
30. This consultation seeks views on the continuation of the seasonal closure in 2022/23 including the exemptions previously available.

### Desired aims

31. This consultation document sets out the key issues that need to be considered in determining arrangements for 2022/23, subject to views received in response to this consultation.
32. The Scottish Government is requesting views on the continuation of the seasonal closure by means of an SSI. We are committed to supporting the recovery of cod stocks in Scottish waters and further afield. We wish to sustain appropriate measures that meet as far as possible the following aims:
- c. to offer effective protection to the local spawning cod stock, as a contribution to the wider recovery of cod stocks; and,
  - d. to complement, as far as possible, other west of Scotland cod recovery or other stock management measures.

### Effectiveness: precautionary approach

33. There has been little sign of improvement in the state of the west of Scotland cod stocks in recent years.<sup>12</sup>
34. As with many area closures of this type, it is challenging to substantiate its precise biological effect. One school of thought is that, since the stock has yet to show significant signs of recovery, it is imperative that the protection offered by the closure, to date, is maintained or even strengthened, because the stock remains vulnerable; on the other hand, some have argued that the closure is not having a demonstrable effect and should therefore be amended or discontinued.
35. The proposed closure area in the Clyde is within ICES<sup>13</sup> Area 6a (West of Scotland)<sup>4</sup> which in 2021 has a bycatch total allowable catch (TAC) of 1279 tonnes for cod and a 2% bycatch limit. The latest scientific advice from ICES for cod in Area 6a states

---

<sup>11</sup> <https://www.legislation.gov.uk/ssi/2019/419>

<sup>12</sup> [cod.27.6a \(ices.dk\)](#)

<sup>13</sup> International Council for the Exploration of the Sea.

that recruitment of cod has been low since 2001 and that, when the maximum sustainable yield (MSY) approach is applied, there should be zero catches in each of the years 2021 and 2022.

36. In August 2015 a scientific paper entitled “Evaluating the effectiveness of a seasonal spawning area closure”<sup>14</sup> was published in the ICES Journal of Marine Science, focusing on this particular closure area. The results from the study was that whilst the rationale for the spawning closure was sensible, it had no detectable impact on wider cod numbers in the Clyde. The paper concluded that this was probably due to the poor state of the stock when the closure was implemented and the continuing sources of mortality.
37. This paper noted, based on earlier studies, that cod from the Clyde are reproductively isolated, having little detectable exchange with the northern spawning aggregations<sup>15, 16</sup>. Genetic evidence also supports this finding, as Clyde cod were found to have a greater similarity to those from the Irish Sea than the cod from the northern aggregations<sup>17</sup>. Irish Sea cod (ICES Area 7a) is also in poor state, with ICES advising catches of no more than 74 tonnes under the precautionary approach. Given the evidence for reproductive isolation it is even more important to have specific management measures in place in the Clyde.
38. More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen’s Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.
39. Taking all of the available evidence into account, the Scottish Government remains of the view that the closure offers some necessary protection to spawning cod at a crucial stage in their life cycle. To remove closure provisions altogether would place cod stocks at unacceptable risk of further depletion, unless appropriate alternative measures were introduced in their place.

## **Ongoing and Future Fisheries Management**

40. The 2019 SSI make provision which achieves the particular requirements of the closure. These provisions provide a degree of legal protection to spawning cod at the correct time and place, whilst allowing for some fishing activities to continue. Furthermore the closure complements other similar closures in the region, including the Irish Sea closure which, since 2001, has taken place at the same time of year as the Clyde closure.
41. In January 2020 the Convenor of the Rural Environment and Connectivity Committee, acting upon representations from The Community of Arran Seabed

---

<sup>14</sup> <http://icesjms.oxfordjournals.org/content/early/2015/08/12/icesjms.fsv144.full.pdf+html>

<sup>15</sup> Wright, P. J., Galley, E., Gibb, I. M., and Neat, F. C. (2006) Fidelity of adult cod to spawning grounds in Scottish waters. *Fisheries Research*, 77: 148-158.

<sup>16</sup> Wright, P. J., Neat, F. C., Gibb, F. M., Gibb, I. M., and Thordarson, H. (2006) Evidence for metapopulation structuring in cod from the west of Scotland and North Sea. *Journal of Fish Biology*, 69: 181-199.

<sup>17</sup> Heath, M. R., Culling, M. A., Crozier, W. W., Fox, C. J., Gurney, W. S. C., Hutchinson, W. F., Nielsen, E. E., Wright, P. J., Calvalho, G. (2014). Combination of genetics and spatial modelling highlights the sensitivity of cod (*Gadus morhua*) population diversity in the North Sea to distributions of fishing. *ICES Journal of Marine Science*, 71: 794-807.

Trust (COAST), requested that the exemptions granted to *Nephrops* trawlers, creel and scallop dredgers were removed from the 2019 and any subsequent SSI providing for the Clyde Cod closure. In response to that request the then Cabinet Secretary committed "...to use the period before the next iteration of the Order (due in force in 2022) to consider the case for the exemptions more closely. Through further consultation with stakeholders, this will consider current science, cod bycatch levels, achieving consistency with conservation measures currently being introduced for cod in the North Sea, and other factors related to Clyde fisheries." EU Exit and the Covid-19 pandemic limited the team's ability to consider and respond to the Convenor's request in 2020; we had intended to consult on this matter in autumn 2021 in respect of the forthcoming SSI.

42. However, on 20 August 2021, the Scottish Government and the Scottish Green Party (SGP) published a shared draft policy programme, setting out areas of collaboration over the current parliamentary term. This document sets out a number of policy objectives which will affect inshore fisheries in Scotland including the Clyde, such as:

- Enhanced fisheries management measures for existing Marine Protected Areas (MPAs) and other key coastal biodiversity sites;
- Designating a suite of Highly Protected Marine Areas (HPMAs) covering at least 10% of Scotland's seas; and
- Additional specific evidence-based measures to protect the inshore seabed.

43. The Scottish Government and the SGP plan to consult as soon as practicable on these policy objectives. It is likely that such consultations will cover the area of the Clyde covered by the forthcoming Clyde cod closure SSI. In order not to forestall and to minimise any overlap with these wide-ranging consultations, this consultation only seeks views on the continuation of the Clyde cod closure measures already provided for, including the exemptions. It is important that there is no gap in these closures to ensure that spawning cod remain protected to prevent further decline to the stock. In the event that the planned Scottish Government and SGP consultations do not cover this area, we will act on the Convenor's request as part of the next biennial consultations.

44. In terms of other ongoing management initiatives, Scottish Ministers committed to a programme of research and practical measures called 'Clyde 2020' to contribute to restoration of the Clyde marine ecosystem. Following the recommendation by Clyde 2020, there are a number of ongoing research projects in the Clyde. As such the Clyde Marine Planning Partnership have been developing The Clyde Regional Marine Plan to ensure sustainable and co-ordinated management of the region. We understand that the regional Inshore Fisheries Group and CFA will input into the CMPP in respect of fishing interests. Further details can be found at the following link: <https://www.clydemarineplan.scot/>

45. Our Future Fisheries Management Strategy<sup>18</sup> makes a commitment to work with our stakeholders to deliver an ecosystem based approach to fisheries management, including considering additional protections for spawning and juvenile aggregation areas in Scottish waters.

## **Proposal for the closure in 2022/23**

---

<sup>18</sup> <https://www.gov.scot/publications/scotlands-future-fisheries-management-strategy-2020-2030/>

46. The proposal on which we are seeking views is to continue **all of the measures which applied in respect** of the 2020/21 closure in 2022/23. Therefore, as in previous years, the 2022/23 closure will provide for fishing restrictions in two areas in the Clyde from 14 February 2022 to 30 April 2022 and 14 February 2023 to 30 April 2023. (Annex A).
47. Area 1 is that part of ICES statistical rectangle 39E4 which lies to the east of the peninsula of Kintyre and to the north of a straight line between 55°18'18" north latitude, 05°38'50" west longitude, and 55°00'30" north latitude, 05°09'24" west longitude.
48. Area 2 is that part of ICES statistical rectangle 39E4 which lies to the north of a straight line between 55°17'57" north latitude, 05°47'54" west longitude and 55°00'00" north latitude, 05°21'00" west longitude and to the south of a straight line between 55°18'18" north latitude, 05°38'50" west longitude and 55°00'30" north latitude, 05°09'24" west longitude<sup>19</sup>.
49. The intention is to protect key spawning grounds (Areas 1 and 2) whilst leaving other areas such as the North Channel and remainder of the Firth of Clyde open with the aim of enabling fishermen to work elsewhere during the closure.

## Exemptions

50. The following exemptions have been provided in previous years:

Area 1: *Nephrops* trawlers, scallop dredgers and creel vessels;

Area 2: Scallop dredgers and creel vessels.

51. For the 2022/23 closure, the Scottish Government proposes to retain these exemptions.
52. The South Arran Marine Conservation Order 2015 No. 437 (MCO)<sup>20</sup> prohibits and regulates fishing activities in the South Arran Nature Conservation Marine Protected Area Order 2014 (MPA). Restrictions contained in the South Arran MCO which overlap with parts of the Clyde cod closure area, will continue to apply in addition to the measures which will be contained in the forthcoming Clyde cod closure SSI. Furthermore, consultations are due to take place regarding fisheries measures for the Clyde Sea Sill MPA in due course, having been delayed by the Covid-19 pandemic. Therefore, in future, should the Clyde cod closure exemptions remain in place, they may not apply in areas within the Clyde Sea Sill MPA where other fisheries management measures may yet be introduced. Finally, as noted above, the proposed continuation of the Clyde cod closure exemptions would be subject to the planned Scottish Government and the Scottish Green party consultations and subsequent policy changes.

---

<sup>19</sup> These are co-ordinates of latitude and longitude according to the World Geodetic System 1984 ("WGS 84"). WGS84 is defined at paragraph 2.1 of the United States National Imagery and Mapping Agency Technical Report TR8350.2, third edition, amendment 1 of 3rd January 2000 entitled "Department of Defense World Geodetic System 1984" (<http://earth-info.nga.mil/GandG/publications/tr8350.2/wgs84fin.pdf>). International Council for the Exploration of the Seas (ICES) standardise the division of sea areas for statistical analysis. Each ICES statistical rectangle is '30 min latitude by 1 degree longitude' in size.

<sup>20</sup> [The South Arran Marine Conservation Order 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

## Conclusion

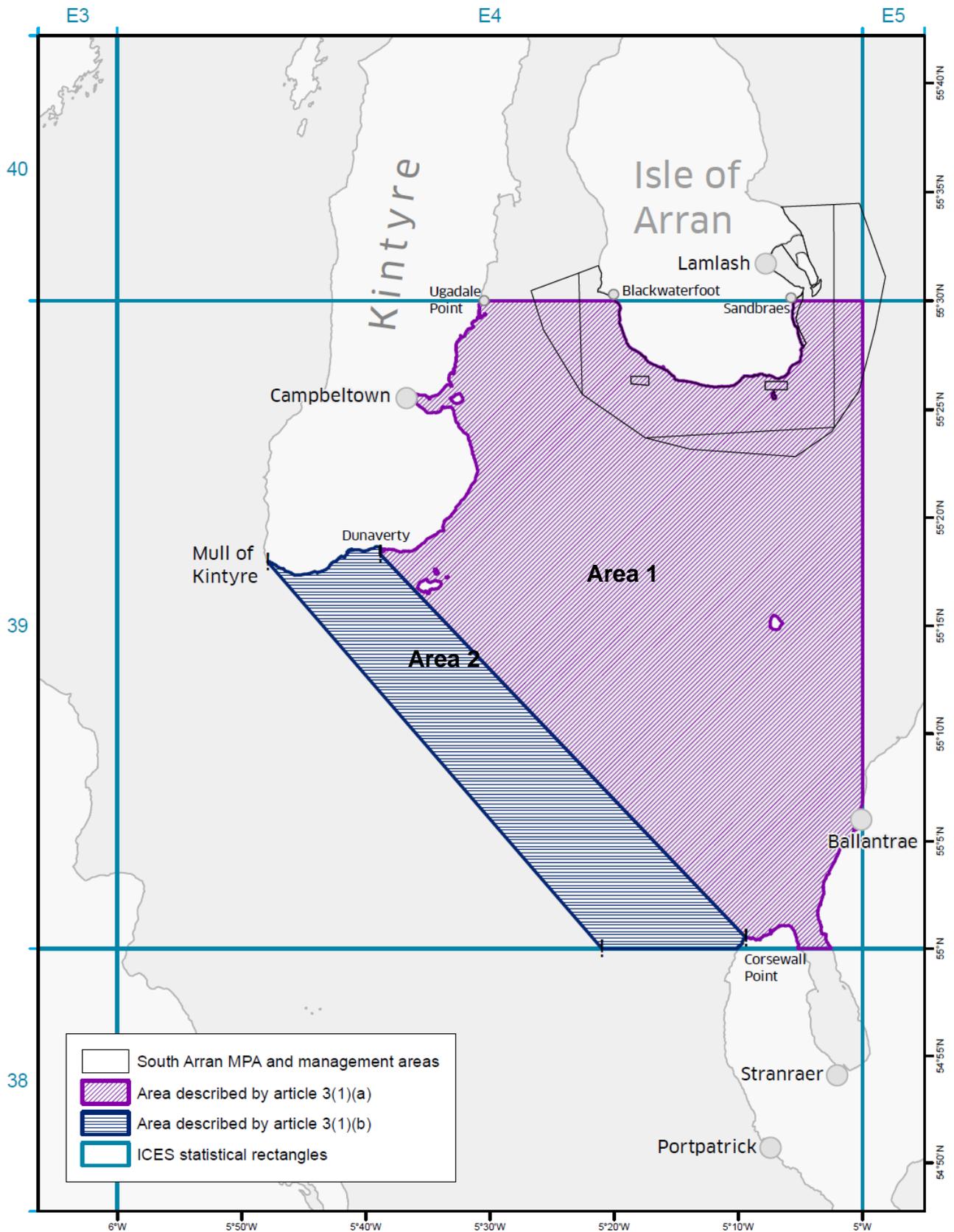
53. The Scottish Government proposes to renew the seasonal closure in the specified area in the Firth of Clyde (see map in Annex A) as in previous years for 2022/23.
54. Views are invited on all issues raised in this consultation paper and responses to the questions posed in Annex C. **We would ask for views to be received no later than 13 October 2021.**

### **What questions does the consultation seek to consider?**

4. Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?
5. Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?
6. Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

# Annex A

Illustrative map of the area.



## **Annex B**

### **Consultation period and responses to the consultation**

This **consultation will run for 4 weeks**, with a **closing date for responses of 13<sup>th</sup> October 2021**.

The consultation Respondent Information Form (RIF) (Annex C) should be completed and sent by email to [Name Redacted]

### **Handling your response**

We need to know how you wish your response to be handled. Please complete and return the Respondent Information Form which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately.

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review;
- inform the development of a particular policy;
- help decision to be made between alternative policy proposals; or,
- be used to finalise legislation before it is implemented.

Final decisions on the issues under consideration will, if appropriate, also take account of a range of other factors, including other available information. While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process; consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

### **Privacy**

Your responses, which will include personal information, are being processed as a public task. You have the right to object to this processing.

Your information will be held securely on the Scottish Government IT system and will only be accessible by authorised officials.

You have the right to ask for any personal information we hold about you.

We will only collect as much information about you as we need and will not share it with anyone outside of Scottish Government. If we share your responses, we will remove your personal details. We will only store your personal information for as long as we need it.

We will only contact you about your responses if you have given consent for us to do so. If you give consent for us to contact you then you have the right to withdraw that consent and you will no longer hear from us. We will continue to process your response information.

If you are unhappy about how your information is being handled then you can contact our data protection officer [dataprotectionofficer@gov.scot](mailto:dataprotectionofficer@gov.scot).

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (FOI) (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise. In the event of an FOI request, personal details would be redacted.

If you have any comments about how this consultation exercise has been conducted, please send them to the same address as for your response.

**Annex C  
Consultation on the Firth of Clyde Cod Spawning Closure  
2022/23**



**RESPONDENT INFORMATION FORM**

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

**1. Name/Organisation**

**Title** Mr  Ms  Mrs  Miss  Dr  **Please tick as appropriate**

**Surname**

**Forename**

**2. Postal Address**

<input type="text"/>		
<b>Postcode</b>	<b>Phone</b>	<b>Email</b>

**3. Privacy**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**  **Yes**  **No**

**CONSULTATION QUESTIONS**

**Question 1:** Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?

Comments:

**Question 2:** Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?

Comments:

**Question 3:** Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

Comments:

**Ref – 017**

**marinescotland**

[Personal data redacted]



Dear Sir/Madam

**Firth of Clyde – Cod Spawning Closure - Spring 2022/23**

Since 2001, a specific area in the Firth of Clyde has been closed to fishing each year between 14 February and 30 April, in order to protect spawning cod. The Scottish Government has responsibility for the closure which is implemented on a biennial basis via a Scottish Statutory Instrument (SSI). Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers due to the low amounts of cod that they catch.

This letter seeks your views on continuation of the closure in 2022/23, including the exemptions previously provided.

All respondents should be aware of the guidance in Annex B and complete the Respondent Information Form (RIF) in Annex C.

Please see Annex B for details on how we will handle your response.

**The deadline for responses is Wednesday 13 October 2021.**

We look forward to hearing your views.

Yours faithfully

[Name redacted]  
Sea Fisheries  
Marine Scotland

## CLYDE COD SPAWNING CLOSURE SPRING 2022/23

### Objective of the consultation

55. The Scottish Government has made a Scottish Statutory Instrument (SSI) on a biennial basis from 2002-2021 to provide for the closure of a specified area of the Clyde to most types of fishing activity from 14 February to 30 April each year. The purpose of the closure, first established by the EU Fisheries Council in 2001, has been to protect spawning cod in the area. Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod they catch.
56. The Sea Fish (Prohibited Methods of Fishing) (Firth of Clyde) Order 2019 No. 419 provided for the closure regime in 2020/21 and is available online<sup>21</sup>.
57. This consultation seeks views on the continuation of the seasonal closure in 2022/23 including the exemptions previously available.

### Desired aims

58. This consultation document sets out the key issues that need to be considered in determining arrangements for 2022/23, subject to views received in response to this consultation.
59. The Scottish Government is requesting views on the continuation of the seasonal closure by means of an SSI. We are committed to supporting the recovery of cod stocks in Scottish waters and further afield. We wish to sustain appropriate measures that meet as far as possible the following aims:
- e. to offer effective protection to the local spawning cod stock, as a contribution to the wider recovery of cod stocks; and,
  - f. to complement, as far as possible, other west of Scotland cod recovery or other stock management measures.

### Effectiveness: precautionary approach

60. There has been little sign of improvement in the state of the west of Scotland cod stocks in recent years.<sup>22</sup>
61. As with many area closures of this type, it is challenging to substantiate its precise biological effect. One school of thought is that, since the stock has yet to show significant signs of recovery, it is imperative that the protection offered by the closure, to date, is maintained or even strengthened, because the stock remains vulnerable; on the other hand, some have argued that the closure is not having a demonstrable effect and should therefore be amended or discontinued.
62. The proposed closure area in the Clyde is within ICES<sup>23</sup> Area 6a (West of Scotland)<sup>4</sup> which in 2021 has a bycatch total allowable catch (TAC) of 1279 tonnes for cod and a 2% bycatch limit. The latest scientific advice from ICES for cod in Area 6a states

---

<sup>21</sup> <https://www.legislation.gov.uk/ssi/2019/419>

<sup>22</sup> [cod.27.6a \(ices.dk\)](#)

<sup>23</sup> International Council for the Exploration of the Sea.

that recruitment of cod has been low since 2001 and that, when the maximum sustainable yield (MSY) approach is applied, there should be zero catches in each of the years 2021 and 2022.

63. In August 2015 a scientific paper entitled “Evaluating the effectiveness of a seasonal spawning area closure”<sup>24</sup> was published in the ICES Journal of Marine Science, focusing on this particular closure area. The results from the study was that whilst the rationale for the spawning closure was sensible, it had no detectable impact on wider cod numbers in the Clyde. The paper concluded that this was probably due to the poor state of the stock when the closure was implemented and the continuing sources of mortality.
64. This paper noted, based on earlier studies, that cod from the Clyde are reproductively isolated, having little detectable exchange with the northern spawning aggregations<sup>25, 26</sup>. Genetic evidence also supports this finding, as Clyde cod were found to have a greater similarity to those from the Irish Sea than the cod from the northern aggregations<sup>27</sup>. Irish Sea cod (ICES Area 7a) is also in poor state, with ICES advising catches of no more than 74 tonnes under the precautionary approach. Given the evidence for reproductive isolation it is even more important to have specific management measures in place in the Clyde.
65. More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen’s Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.
66. Taking all of the available evidence into account, the Scottish Government remains of the view that the closure offers some necessary protection to spawning cod at a crucial stage in their life cycle. To remove closure provisions altogether would place cod stocks at unacceptable risk of further depletion, unless appropriate alternative measures were introduced in their place.

## Ongoing and Future Fisheries Management

67. The 2019 SSI make provision which achieves the particular requirements of the closure. These provisions provide a degree of legal protection to spawning cod at the correct time and place, whilst allowing for some fishing activities to continue. Furthermore the closure complements other similar closures in the region, including the Irish Sea closure which, since 2001, has taken place at the same time of year as the Clyde closure.
68. In January 2020 the Convenor of the Rural Environment and Connectivity Committee, acting upon representations from The Community of Arran Seabed

---

<sup>24</sup> <http://icesjms.oxfordjournals.org/content/early/2015/08/12/icesjms.fsv144.full.pdf+html>

<sup>25</sup> Wright, P. J., Galley, E., Gibb, I. M., and Neat, F. C. (2006) Fidelity of adult cod to spawning grounds in Scottish waters. *Fisheries Research*, 77: 148-158.

<sup>26</sup> Wright, P. J., Neat, F. C., Gibb, F. M., Gibb, I. M., and Thordarson, H. (2006) Evidence for metapopulation structuring in cod from the west of Scotland and North Sea. *Journal of Fish Biology*, 69: 181-199.

<sup>27</sup> Heath, M. R., Culling, M. A., Crozier, W. W., Fox, C. J., Gurney, W. S. C., Hutchinson, W. F., Nielsen, E. E., Wright, P. J., Calvalho, G. (2014). Combination of genetics and spatial modelling highlights the sensitivity of cod (*Gadus morhua*) population diversity in the North Sea to distributions of fishing. *ICES Journal of Marine Science*, 71: 794-807.

Trust (COAST), requested that the exemptions granted to *Nephrops* trawlers, creel and scallop dredgers were removed from the 2019 and any subsequent SSI providing for the Clyde Cod closure. In response to that request the then Cabinet Secretary committed "...to use the period before the next iteration of the Order (due in force in 2022) to consider the case for the exemptions more closely. Through further consultation with stakeholders, this will consider current science, cod bycatch levels, achieving consistency with conservation measures currently being introduced for cod in the North Sea, and other factors related to Clyde fisheries." EU Exit and the Covid-19 pandemic limited the team's ability to consider and respond to the Convenor's request in 2020; we had intended to consult on this matter in autumn 2021 in respect of the forthcoming SSI.

69. However, on 20 August 2021, the Scottish Government and the Scottish Green Party (SGP) published a shared draft policy programme, setting out areas of collaboration over the current parliamentary term. This document sets out a number of policy objectives which will affect inshore fisheries in Scotland including the Clyde, such as:

- Enhanced fisheries management measures for existing Marine Protected Areas (MPAs) and other key coastal biodiversity sites;
- Designating a suite of Highly Protected Marine Areas (HPMAs) covering at least 10% of Scotland's seas; and
- Additional specific evidence-based measures to protect the inshore seabed.

70. The Scottish Government and the SGP plan to consult as soon as practicable on these policy objectives. It is likely that such consultations will cover the area of the Clyde covered by the forthcoming Clyde cod closure SSI. In order not to forestall and to minimise any overlap with these wide-ranging consultations, this consultation only seeks views on the continuation of the Clyde cod closure measures already provided for, including the exemptions. It is important that there is no gap in these closures to ensure that spawning cod remain protected to prevent further decline to the stock. In the event that the planned Scottish Government and SGP consultations do not cover this area, we will act on the Convenor's request as part of the next biennial consultations.

71. In terms of other ongoing management initiatives, Scottish Ministers committed to a programme of research and practical measures called 'Clyde 2020' to contribute to restoration of the Clyde marine ecosystem. Following the recommendation by Clyde 2020, there are a number of ongoing research projects in the Clyde. As such the Clyde Marine Planning Partnership have been developing The Clyde Regional Marine Plan to ensure sustainable and co-ordinated management of the region. We understand that the regional Inshore Fisheries Group and CFA will input into the CMPP in respect of fishing interests. Further details can be found at the following link: <https://www.clydemarineplan.scot/>

72. Our Future Fisheries Management Strategy<sup>28</sup> makes a commitment to work with our stakeholders to deliver an ecosystem based approach to fisheries management, including considering additional protections for spawning and juvenile aggregation areas in Scottish waters.

## **Proposal for the closure in 2022/23**

---

<sup>28</sup> <https://www.gov.scot/publications/scotlands-future-fisheries-management-strategy-2020-2030/>

73. The proposal on which we are seeking views is to continue **all of the measures which applied in respect** of the 2020/21 closure in 2022/23. Therefore, as in previous years, the 2022/23 closure will provide for fishing restrictions in two areas in the Clyde from 14 February 2022 to 30 April 2022 and 14 February 2023 to 30 April 2023. (Annex A).
74. Area 1 is that part of ICES statistical rectangle 39E4 which lies to the east of the peninsula of Kintyre and to the north of a straight line between 55°18'18" north latitude, 05°38'50" west longitude, and 55°00'30" north latitude, 05°09'24" west longitude.
75. Area 2 is that part of ICES statistical rectangle 39E4 which lies to the north of a straight line between 55°17'57" north latitude, 05°47'54" west longitude and 55°00'00" north latitude, 05°21'00" west longitude and to the south of a straight line between 55°18'18" north latitude, 05°38'50" west longitude and 55°00'30" north latitude, 05°09'24" west longitude<sup>29</sup>.
76. The intention is to protect key spawning grounds (Areas 1 and 2) whilst leaving other areas such as the North Channel and remainder of the Firth of Clyde open with the aim of enabling fishermen to work elsewhere during the closure.

## Exemptions

77. The following exemptions have been provided in previous years:

Area 1: *Nephrops* trawlers, scallop dredgers and creel vessels;

Area 2: Scallop dredgers and creel vessels.

78. For the 2022/23 closure, the Scottish Government proposes to retain these exemptions.
79. The South Arran Marine Conservation Order 2015 No. 437 (MCO)<sup>30</sup> prohibits and regulates fishing activities in the South Arran Nature Conservation Marine Protected Area Order 2014 (MPA). Restrictions contained in the South Arran MCO which overlap with parts of the Clyde cod closure area, will continue to apply in addition to the measures which will be contained in the forthcoming Clyde cod closure SSI. Furthermore, consultations are due to take place regarding fisheries measures for the Clyde Sea Sill MPA in due course, having been delayed by the Covid-19 pandemic. Therefore, in future, should the Clyde cod closure exemptions remain in place, they may not apply in areas within the Clyde Sea Sill MPA where other fisheries management measures may yet be introduced. Finally, as noted above, the proposed continuation of the Clyde cod closure exemptions would be subject to the planned Scottish Government and the Scottish Green party consultations and subsequent policy changes.

---

<sup>29</sup> These are co-ordinates of latitude and longitude according to the World Geodetic System 1984 ("WGS 84"). WGS84 is defined at paragraph 2.1 of the United States National Imagery and Mapping Agency Technical Report TR8350.2, third edition, amendment 1 of 3rd January 2000 entitled "Department of Defense World Geodetic System 1984" (<http://earth-info.nga.mil/GandG/publications/tr8350.2/wgs84fin.pdf>). International Council for the Exploration of the Seas (ICES) standardise the division of sea areas for statistical analysis. Each ICES statistical rectangle is '30 min latitude by 1 degree longitude' in size.

<sup>30</sup> [The South Arran Marine Conservation Order 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

## Conclusion

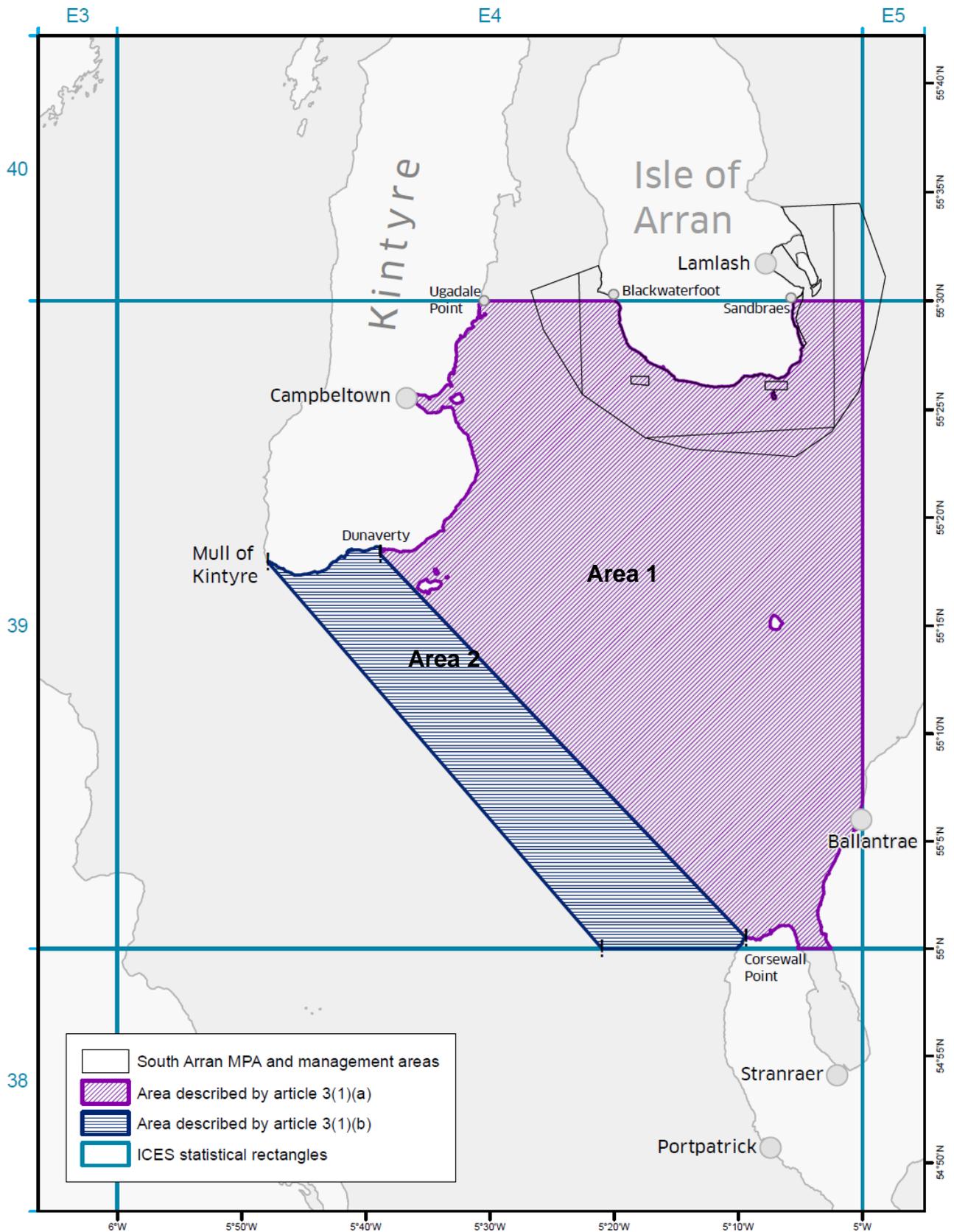
80. The Scottish Government proposes to renew the seasonal closure in the specified area in the Firth of Clyde (see map in Annex A) as in previous years for 2022/23.
81. Views are invited on all issues raised in this consultation paper and responses to the questions posed in Annex C. **We would ask for views to be received no later than 13 October 2021.**

### **What questions does the consultation seek to consider?**

7. Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?
8. Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?
9. Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

# Annex A

Illustrative map of the area.



## **Annex B**

### **Consultation period and responses to the consultation**

This **consultation will run for 4 weeks**, with a **closing date for responses of 13<sup>th</sup> October 2021**.

The consultation Respondent Information Form (RIF) (Annex C) should be completed and sent by email to [Name redacted] at: [Personal data redacted]

### **Handling your response**

We need to know how you wish your response to be handled. Please complete and return the Respondent Information Form which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately.

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review;
- inform the development of a particular policy;
- help decision to be made between alternative policy proposals; or,
- be used to finalise legislation before it is implemented.

Final decisions on the issues under consideration will, if appropriate, also take account of a range of other factors, including other available information. While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process; consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

### **Privacy**

Your responses, which will include personal information, are being processed as a public task. You have the right to object to this processing.

Your information will be held securely on the Scottish Government IT system and will only be accessible by authorised officials.

You have the right to ask for any personal information we hold about you.

We will only collect as much information about you as we need and will not share it with anyone outside of Scottish Government. If we share your responses, we will remove your personal details. We will only store your personal information for as long as we need it.

We will only contact you about your responses if you have given consent for us to do so. If you give consent for us to contact you then you have the right to withdraw that consent and you will no longer hear from us. We will continue to process your response information.

If you are unhappy about how your information is being handled then you can contact our data protection officer [dataprotectionofficer@gov.scot](mailto:dataprotectionofficer@gov.scot).

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (FOI) (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise. In the event of an FOI request, personal details would be redacted.

If you have any comments about how this consultation exercise has been conducted, please send them to the same address as for your response.

**Annex C  
Consultation on the Firth of Clyde Cod Spawning Closure  
2022/23**



**RESPONDENT INFORMATION FORM**

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

**1. Name/Organisation**

**Title** Mr  Ms  Mrs  Miss  Dr  **Please tick as appropriate**

**Surname**

**Forename**

**2. Postal Address**

<input type="text"/>		
<b>Postcode</b>	<b>Phone</b>	<b>Email</b>

**3. Privacy**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**  **Yes**  **No**

**CONSULTATION QUESTIONS**

**Question 1:** Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?

Comments:

**Question 2:** Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?

Comments:

**Question 3:** Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

Comments:

Ref – 073

# **Clyde Cod Spawning Closure 2022-23: Consultation**

**October 2021**



E: [Name Redacted]

15 September 2021

Dear Sir/Madam

1. Firth of Clyde – Cod Spawning Closure - Spring 2022/23

Since 2001, a specific area in the Firth of Clyde has been closed to fishing each year between 14 February and 30 April, in order to protect spawning cod. The Scottish Government has responsibility for the closure which is implemented on a biennial basis via a Scottish Statutory Instrument (SSI). Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers due to the low amounts of cod that they catch.

This letter seeks your views on continuation of the closure in 2022/23, including the exemptions previously provided.

All respondents should be aware of the guidance in Annex B and complete the Respondent Information Form (RIF) in Annex C.

Please see Annex B for details on how we will handle your response.

Our initial consultation focused on our existing list of stakeholders; we are now extending this consultation to enable members of the public to share their views.

The previous closing date was 13 October, however we have extended this to allow a further 2 week consultation to be carried out online.

We look forward to hearing your views.

Yours faithfully

**[Name Redacted]**  
Sea Fisheries  
Marine Scotland

## 2. Clyde Cod Spawning Closure Spring

### 2022/23 Objective of the Consultation

1. The Scottish Government has made a Scottish Statutory Instrument (SSI) on a biennial basis from 2002-2021 to provide for the closure of a specified area of the Clyde to most types of fishing activity from 14 February to 30 April each year. The purpose of the closure, first established by the EU Fisheries Council in 2001, has been to protect spawning cod in the area. Exemptions have always been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod they catch.
2. The Sea Fish (Prohibited Methods of Fishing) (Firth of Clyde) Order 2019 No. 419 provided for the closure regime in 2020/21 and is available online<sup>1</sup>.
3. This consultation seeks views on the continuation of the seasonal closure in 2022/23 including the exemptions previously available.

### 3. Desired Aims

4. This consultation document sets out the key issues that need to be considered in determining arrangements for 2022/23, subject to views received in response to this consultation.
5. The Scottish Government is requesting views on the continuation of the seasonal closure by means of an SSI. We are committed to supporting the recovery of cod stocks in Scottish waters and further afield. We wish to sustain appropriate measures that meet as far as possible the following aims:
  - a. to offer effective protection to the local spawning cod stock, as a contribution to the wider recovery of cod stocks; and,
  - b. to complement, as far as possible, other west of Scotland cod recovery or other stock management measures.

### 4. Effectiveness: Precautionary Approach

6. There has been little sign of improvement in the state of the west of Scotland cod stocks in recent years.<sup>2</sup>
7. As with many area closures of this type, it is challenging to substantiate its precise biological effect. One school of thought is that, since the stock has yet to show significant signs of recovery, it is imperative that the protection offered by the closure, to date, is maintained or even strengthened, because the stock remains vulnerable; on the other hand, some have argued that the closure is not having a demonstrable effect and should therefore be amended or discontinued.
8. The proposed closure area in the Clyde is within ICES<sup>3</sup> Area 6a (West of Scotland)<sup>4</sup> which in 2021 has a bycatch total allowable catch (TAC) of 1279 tonnes for cod and a 2% bycatch limit. The latest scientific advice from ICES for cod in Area 6a states that

---

<sup>1</sup> <https://www.legislation.gov.uk/ssi/2019/419>

<sup>2</sup> [cod.27.6a \(ices.dk\)](#)

<sup>3</sup> International Council for the Exploration of the Sea.

recruitment of cod has been low since 2001 and that, when the maximum sustainable yield (MSY) approach is applied, there should be zero catches in each of the years 2021 and 2022.

9. In August 2015 a scientific paper entitled “Evaluating the effectiveness of a seasonal spawning area closure”<sup>4</sup> was published in the ICES Journal of Marine Science, focusing on this particular closure area. The results from the study was that whilst the rationale for the spawning closure was sensible, it had no detectable impact on wider cod numbers in the Clyde. The paper concluded that this was probably due to the poor state of the stock when the closure was implemented and the continuing sources of mortality.
10. This paper noted, based on earlier studies, that cod from the Clyde are reproductively isolated, having little detectable exchange with the northern spawning aggregations<sup>5,6</sup>. Genetic evidence also supports this finding, as Clyde cod were found to have a greater similarity to those from the Irish Sea than the cod from the northern aggregations<sup>7</sup>. Irish Sea cod (ICES Area 7a) is also in poor state, with ICES advising catches of no more than 74 tonnes under the precautionary approach. Given the evidence for reproductive isolation it is even more important to have specific management measures in place in the Clyde.
11. More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen’s Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.
12. Taking all of the available evidence into account, the Scottish Government remains of the view that the closure offers some necessary protection to spawning cod at a crucial stage in their life cycle. To remove closure provisions altogether would place cod stocks at unacceptable risk of further depletion, unless appropriate alternative measures were introduced in their place.

## 5. Ongoing and Future Fisheries Management

13. The 2019 SSI make provision which achieves the particular requirements of the closure. These provisions provide a degree of legal protection to spawning cod at the correct time and place, whilst allowing for some fishing activities to continue. Furthermore the closure complements other similar closures in the region, including the Irish Sea closure which, since 2001, has taken place at the same time of year as the Clyde closure.
14. In January 2020 the Convenor of the Rural Environment and Connectivity Committee, acting upon representations from The Community of Arran Seabed Trust (COAST), requested that the exemptions granted to *Nephrops* trawlers, creel and scallop dredgers were removed from the 2019 and any subsequent SSI providing for the Clyde Cod

---

<sup>4</sup> <http://icesjms.oxfordjournals.org/content/early/2015/08/12/icesjms.fsv144.full.pdf+html>

<sup>5</sup> Wright, P. J., Galley, E., Gibb, I. M., and Neat, F. C. (2006) Fidelity of adult cod to spawning grounds in Scottish waters. Fisheries Research, 77: 148-158.

<sup>6</sup> Wright, P. J., Neat, F. C., Gibb, F. M., Gibb, I. M., and Thordarson, H. (2006) Evidence for metapopulation structuring in cod from the west of Scotland and North Sea. Journal of Fish Biology, 69: 181-199.

<sup>7</sup> Heath, M. R., Culling, M. A., Crozier, W. W., Fox, C. J., Gurney, W. S. C., Hutchinson, W. F., Nielsen, E. E., Wright, PJ, Calvalho, G. (2014). Combination of genetics and spatial modelling highlights the sensitivity of cod (*Gadus morhua*) population diversity in the North Sea to distributions of fishing. ICES Journal of Marine Science, 71: 794-807.

closure. In response to that request the then Cabinet Secretary committed "...to use the period before the next iteration of the Order (due in force in 2022) to consider the case for the exemptions more closely. Through further consultation with stakeholders, this will consider current science, cod bycatch levels, achieving consistency with conservation measures currently being introduced for cod in the North Sea, and other factors related to Clyde fisheries." EU Exit and the Covid-19 pandemic limited the team's ability to consider and respond to the Convenor's request in 2020; we had intended to consult on this matter in autumn 2021 in respect of the forthcoming SSI.

15. However, on 20 August 2021, the Scottish Government and the Scottish Green Party (SGP) published a shared draft policy programme, setting out areas of collaboration over the current parliamentary term. This document sets out a number of policy objectives which will affect inshore fisheries in Scotland including the Clyde, such as:
  - Enhanced fisheries management measures for existing Marine Protected Areas (MPAs) and other key coastal biodiversity sites;
  - Designating a suite of Highly Protected Marine Areas (HPMAs) covering at least 10% of Scotland's seas; and
  - Additional specific evidence-based measures to protect the inshore seabed.
16. The Scottish Government and the SGP plan to consult as soon as practicable on these policy objectives. It is likely that such consultations will cover the area of the Clyde covered by the forthcoming Clyde cod closure SSI. In order not to forestall and to minimise any overlap with these wide-ranging consultations, this consultation only seeks views on the continuation of the Clyde cod closure measures already provided for, including the exemptions. It is important that there is no gap in these closures to ensure that spawning cod remain protected to prevent further decline to the stock. In the event that the planned Scottish Government and SGP consultations do not cover this area, we will act on the Convenor's request as part of the next biennial consultations.
17. In terms of other ongoing management initiatives, Scottish Ministers committed to a programme of research and practical measures called 'Clyde 2020' to contribute to restoration of the Clyde marine ecosystem. Following the recommendation by Clyde 2020, there are a number of ongoing research projects in the Clyde. As such the Clyde Marine Planning Partnership have been developing The Clyde Regional Marine Plan to ensure sustainable and co-ordinated management of the region. We understand that the regional Inshore Fisheries Group and CFA will input into the CMPP in respect of fishing interests. Further details can be found at the following link: <https://www.clydemarineplan.scot/>
18. Our Future Fisheries Management Strategy<sup>8</sup> makes a commitment to work with our stakeholders to deliver an ecosystem based approach to fisheries management, including considering additional protections for spawning and juvenile aggregation areas in Scottish waters.

## 6. Proposal for the Closure in 2022/23

19. The proposal on which we are seeking views is to continue all of the measures which applied in respect of the 2020/21 closure in 2022/23. Therefore, as in previous years, the 2022/23 closure will provide for fishing restrictions in two areas in the Clyde from 14 February 2022 to 30 April 2022 and 14 February 2023 to 30 April 2023. (Annex A).

---

<sup>8</sup> <https://www.gov.scot/publications/scotlands-future-fisheries-management-strategy-2020-2030/>

20. Area 1 is that part of ICES statistical rectangle 39E4 which lies to the east of the peninsula of Kintyre and to the north of a straight line between 55°18'18" north latitude, 05°38'50" west longitude, and 55°00'30" north latitude, 05°09'24" west longitude.
21. Area 2 is that part of ICES statistical rectangle 39E4 which lies to the north of a straight line between 55°17'57" north latitude, 05°47'54" west longitude and 55°00'00" north latitude, 05°21'00" west longitude and to the south of a straight line between 55°18'18" north latitude, 05°38'50" west longitude and 55°00'30" north latitude, 05°09'24" west longitude<sup>9</sup>.
22. The intention is to protect key spawning grounds (Areas 1 and 2) whilst leaving other areas such as the North Channel and remainder of the Firth of Clyde open with the aim of enabling fishermen to work elsewhere during the closure.

## 7. Exemptions

23. The following exemptions have been provided in previous years:

Area 1: *Nephrops* trawlers, scallop dredgers and creel vessels;

Area 2: Scallop dredgers and creel vessels.

24. For the 2022/23 closure, the Scottish Government proposes to retain these exemptions.

25. The South Arran Marine Conservation Order 2015 No. 437 (MCO) <sup>10</sup> prohibits and regulates fishing activities in the South Arran Nature Conservation Marine Protected Area Order 2014(MPA). Restrictions contained in the South Arran MCO which overlap with parts of the Clyde cod closure area, will continue to apply in addition to the measures which will be contained in the forthcoming Clyde cod closure SSI. Furthermore, consultations are due to take place regarding fisheries measures for the Clyde Sea Sill MPA in due course, having been delayed by the Covid-19 pandemic. Therefore, in future, should the Clyde cod closure exemptions remain in place, they may not apply in areas within the Clyde Sea Sill MPA where other fisheries management measures may yet be introduced. Finally, as noted above, the proposed continuation of the Clyde cod closure exemptions would be subject to the planned Scottish Government and the Scottish Green party consultations and subsequent policy changes.

## 8. Conclusion

26. The Scottish Government proposes to renew the seasonal closure in the specified area in the Firth of Clyde (see map in Annex A) as in previous years for 2022/23.
27. Views are invited on all issues raised in this consultation paper and responses to the questions posed in Annex C.

---

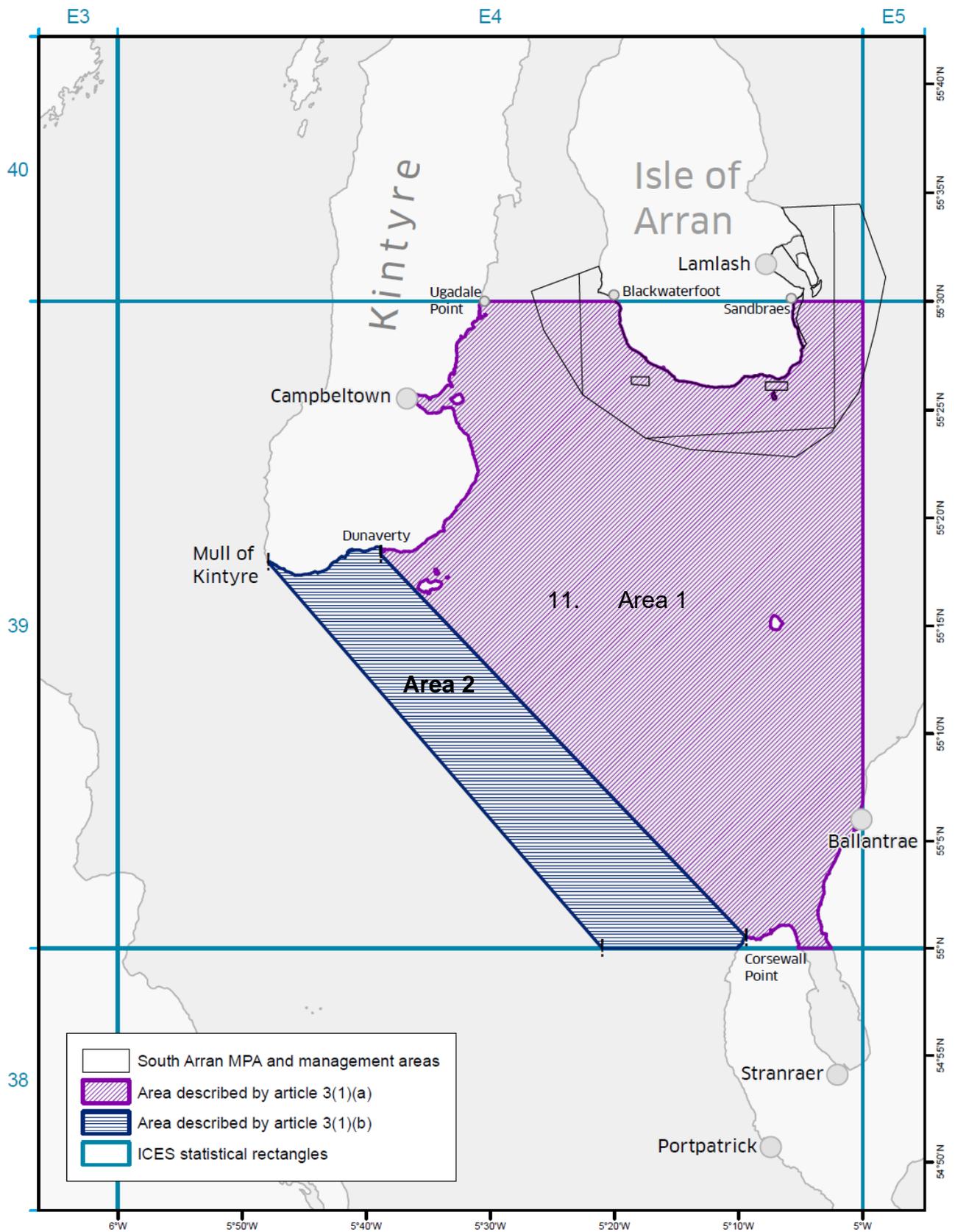
<sup>9</sup> These are co-ordinates of latitude and longitude according to the World Geodetic System 1984 ("WGS 84"). WGS84 is defined at paragraph 2.1 of the United States National Imagery and Mapping Agency Technical Report TR8350.2, third edition, amendment 1 of 3rd January 2000 entitled "Department of Defense World Geodetic System 1984" (<http://earth-info.nga.mil/GandG/publications/tr8350.2/wgs84fin.pdf>). International Council for the Exploration of the Seas (ICES) standardise the division of sea areas for statistical analysis. Each ICES statistical rectangle is '30 min latitude by 1 degree longitude' in size.

<sup>10</sup> [The South Arran Marine Conservation Order 2015 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

9. What questions does the consultation seek to consider?
1. Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?
  2. Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?
  3. Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

10. Annex A

Illustrative map of the area.



NOT FOR NAVIGATION. Created by Scottish Government (Marine Scotland) 2015. gj1069. © Crown Copyright. Contains data © ICES  
 Projection: Mercator. Datum: WGS 1984. Standard Parallel: 55°0'0.00"N

## Annex B

### Responding to this Consultation

We are inviting responses to this consultation by Thursday 4th November 2021.

Please respond to this consultation using the Scottish Government's consultation hub, Citizen Space (<http://consult.gov.scot>). Access and respond to this consultation online at <https://consult.gov.scot/marine-scotland/cod-spawning-closure/>. You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of Thursday 4th November 2021.

If you are unable to respond using our consultation hub, please complete the Respondent Information Form to:

Sea Fisheries – International Fisheries Demersal  
Scottish Government  
Area 1B-North  
Victoria Quay  
Edinburgh, EH6 6QQ

#### 12. Handling your response

If you respond using the consultation hub, you will be directed to the About You page before submitting your response. Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will regard it as confidential, and we will 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 would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document.

To find out how we handle your personal data, please see our privacy policy:  
<https://www.gov.scot/privacy/>

#### 13. 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 available to the public at <http://consult.gov.scot>. If you use the consultation hub to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us. Responses will be published where we have been given permission to do so. An analysis report will also be made available.

#### 14. Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to the contact address above or at **[Contact details redacted]**

## 15. Scottish Government consultation process

Consultation is an essential part of the policymaking process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations online: <http://consult.gov.scot>. Each consultation details the issues under consideration, as well as a way for you to give us your views, either online, by email or by post.

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

## 16. Annex C

**Consultation on the Firth of Clyde Cod Spawning Closure 2022/23****Respondent Information Form**

**Please Note** this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our privacy policy:

<https://www.gov.scot/privacy/>

Are you responding as an individual or an organisation?

- Individual  
 Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name  
 Publish response only (without name)  
 Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
- No

17. Consultation Questions

**Question 1:** Do you agree with the Scottish Government's view that it is appropriate to renew the seasonal closure in the Clyde, as in previous years, to protect spawning cod, for 2022/23?

Comments:

**Question 2:** Do you have any views on the proposed continuation of exemptions, which have previously applied, for fishing boats fishing with scallop dredges, creels or trawls used for fishing for Norway lobsters?

Comments:

**Question 3:** Do you have any views on alternative or complementary measures that could be considered for the protection of cod spawning in the Firth of Clyde for 2024 and beyond?

Comments:



© Crown copyright 2021

## **OGL**

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit **[nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)** or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: **[psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk)**.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at **[www.gov.scot](http://www.gov.scot)**

Any enquiries regarding this publication should be sent to us

at The Scottish Government  
St Andrew's House  
Edinb  
urgh  
EH1  
3DG

ISBN: 978-1-80201-513-3 (web only)

**Ref – 002**

[Personal data redacted]

30<sup>th</sup> August 2019

Dear Sir/Madam

**Firth of Clyde – Cod Spawning Closure - Spring 2020/21**

Since 2001, a specific area in the Firth of Clyde has been closed to fishing each year between 14<sup>th</sup> February and 30<sup>th</sup> April in order to protect spawning cod. The Scottish Government has responsibility for the closure which is implemented on a biennial basis via a Scottish Statutory Instrument (SSI). Exemptions have been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod that they catch.

This letter seeks your views on continuation of the closure in 2020/21 including the exemptions previously provided.

All respondents should be aware of the guidance in Annex B (which also explains how we will handle your response) and should complete the Respondent Information Form (RIF) at Annex C.

**The deadline for responses is 20<sup>th</sup> September 2019.**

We look forward to hearing your views.

Yours faithfully

[Name redacted]  
Sea Fisheries  
Marine Scotland  
30<sup>th</sup> August 2019

## CLYDE COD SPAWNING CLOSURE SPRING 2020/21

### Objective of the consultation

82. The Scottish Government has introduced a Scottish Statutory Instrument (SSI) each year from 2002-2019 to provide for the closure of a specified area of the Clyde to most types of fishing activity from 14 February to 30 April. The purpose of the closure, first introduced by the EU Fisheries Council in 2001, has been to protect spawning cod in the area. Exemptions have been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod they catch.

83. SSI 2017/450 providing for the current closure regime in 2018/19 is available online<sup>31</sup>.

84. This consultation seeks views on Scottish Government's proposal to continue the closure in 2020/21 including the exemptions previously provided.

### Desired aims

85. This document sets out the key issues that need to be considered in determining arrangements for 2020/21 and how the Scottish Government intends to proceed, subject to views received in response to this consultation.

86. The Scottish Government is requesting views on the continuation of a seasonal closure by means of an SSI. We are committed to supporting the recovery of cod stocks in Scottish waters and further afield. We wish to sustain appropriate measures that meet as far as possible the following aims:

g. to offer effective protection to the local spawning cod stock, as a contribution to the wider recovery of cod stocks; and,

h. to complement, as far as possible, other west of Scotland cod recovery or other stock management measures.

### Effectiveness: precautionary approach

87. There has been little sign of improvement in the state of cod stocks in the west of Scotland in recent years.

88. As for many area closures of this type, it is relatively difficult to substantiate its precise biological effect. Some argue that the fact that the stock has yet to show significant signs of recovery means that it is imperative that the protection offered by the closure is maintained, because the stock remains vulnerable; others argue that the closure is not having a demonstrable substantial effect and should therefore be amended or discontinued.

89. The proposed closure area in the Clyde is within ICES<sup>32</sup> area 6a (West of Scotland)<sup>33</sup> which in 2019 has a TAC of 1735 tonnes for cod and a 10% bycatch limit. The latest scientific advice from ICES for cod in area 6a states that recruitment of cod has been low since 2001

---

<sup>31</sup> [www.legislation.gov.uk/ssi/2017/450/made/data.pdf](http://www.legislation.gov.uk/ssi/2017/450/made/data.pdf)

<sup>32</sup> International Council for the Exploration of the Sea.

<sup>33</sup> <http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2019/2019/cod.27.6a.pdf>

and is considered impaired and - when the maximum sustainable yield (MSY) approach is applied - there should be zero catches in each of the years 2020 and 2021.

90. In August 2015 a scientific paper entitled "*Evaluating the effectiveness of a seasonal spawning area closure*"<sup>34</sup> was published. The message from the study was that whilst the rationale for the spawning closure was sensible, it had no detectable impact on wider cod numbers. The paper concluded that this was probably due to the poor state of the stock when the closure was implemented and the continuing sources of fishing mortality other than fishing, as well as an increase in predators and competitors.
91. However, it has also been found that cod from the Clyde are reproductively isolated, having little detectable exchange with the northern spawning aggregations<sup>35,36</sup>. Genetic evidence also supports this population structure as Clyde cod were found to have a greater similarity to those from the Irish Sea than the cod from the northern aggregations<sup>37</sup>.
92. More recently a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association during the spawning period with demersal and pelagic gears. Although still in draft format the report shows the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time. A programme of work has been agreed for the study to continue biannually for 5 years.
93. Taking all of the available evidence into account the Scottish Government remains of the view that the closure does offer some necessary protection to spawning fish at a crucial stage in their life cycle. To remove closure provisions altogether would place wider cod stocks at unacceptable risk of further depletion, unless appropriate alternative measures were introduced in its place.
94. Scottish Ministers have committed to a programme of research and practical measures called 'Clyde 2020' to contribute to restoration of the Clyde marine ecosystem. The work will be overseen by a sub-group of the Clyde Marine Planning Partnership. Clyde 2020 will implement a programme of work to enhance the Clyde marine ecosystem and as part of this work it will consider what further management may be needed.
95. The terms of the current SSI are tailored to the particular requirements of the closure. The terms aim to provide legal protection for spawning cod at the correct time and place, and allow for some fishing activities to continue. Furthermore the closure complements other such closures in the region, including the Irish Sea closure which has taken place at the same time of year as the Clyde closure since 2001.

---

<sup>34</sup> <http://icesjms.oxfordjournals.org/content/early/2015/08/12/icesjms.fsv144.full.pdf+html>

<sup>35</sup> Wright, P. J., Galley, E., Gibb, I. M., and Neat, F. C. (2006) Fidelity of adult cod to spawning grounds in Scottish waters. *Fisheries Research*, 77: 148-158.

<sup>36</sup> Wright, P. J., Neat, F. C., Gibb, F. M., Gibb, I. M., and Thordarson, H. (2006) Evidence for metapopulation structuring in cod from the west of Scotland and North Sea. *Journal of Fish Biology*, 69: 181-199.

<sup>37</sup> Heath, M. R., Culling, M. A., Crozier, W. W., Fox, C. J., Gurney, W. S. C., Hutchinson, W. F., Nielsen, E. E., Wright, P. J., Calvalho, G. (2014). Combination of genetics and spatial modelling highlights the sensitivity of cod (*Gadus morhua*) population diversity in the North Sea to distributions of fishing. *ICES Journal of Marine Science*, 71: 794-807.

## Spatial extent of the closure

96. The proposal on which we are seeking views is to continue all of the provisions of the 2018/19 closure into 2020/21. As in previous years, the 2020/21 closure will provide for restriction in two areas from 14 February to 30 April (Annex A).
97. Area 1 is that part of ICES statistical rectangle 39E4 which lies to the east of the peninsula of Kintyre and to the north of a straight line between 55°18'18" north latitude, 05°38'50" west longitude, and 55°00'30" north latitude, 05°09'24" west longitude.
98. Area 2 is that part of ICES statistical rectangle 39E4 which lies to the north of a straight line between 55°17'57" north latitude, 05°47'54" west longitude and 55°00'00" north latitude, 05°21'00" west longitude and to the south of a straight line between 55°18'18" north latitude, 05°38'50" west longitude and 55°00'30" north latitude, 05°09'24" west longitude<sup>38</sup>.
99. The intention is to protect key spawning grounds and aggregations whilst leaving other areas, such as the North Channel, open with the aim of enabling fishermen to work elsewhere during the closure.

## Exemptions

100. The following exemptions have been provided in previous years:
- Area 1: *Nephrops* trawlers, scallop dredgers and creel vessels;
- Area 2: Scallop dredgers and creel vessels.
101. For the 2020/21 closure, the Scottish Government proposes to retain these exemptions.
102. Note that exemptions do not apply in areas within the South Arran MPA where other fisheries management measures are in place<sup>39</sup>. Furthermore, consultations are due to take place in 2019 regarding fisheries measures for the Clyde Sea Sill MPA. In future, exemptions may therefore also not apply in areas within the Clyde Sea Sill MPA where other fisheries management measures may be introduced.

## Conclusion

103. The Scottish Government considers that it would be appropriate to continue the provisions for the closure in previous years into 2020/21.
104. Views are invited on all issues raised in this paper and responses to the questions posed in Annex C. **We would ask for views to be received no later than 20<sup>th</sup> September 2019.**

---

<sup>38</sup> These are co-ordinates of latitude and longitude according to the World Geodetic System 1984 ("WGS 84"). WGS84 is defined at paragraph 2.1 of the United States National Imagery and Mapping Agency Technical Report TR8350.2, third edition, amendment 1 of 3rd January 2000 entitled "Department of Defense World Geodetic System 1984" (<http://earth-info.nga.mil/GandG/publications/tr8350.2/wgs84fin.pdf>). International Council for the Exploration of the Seas (ICES) standardise the division of sea areas for statistical analysis. Each ICES statistical rectangle is '30 min latitude by 1 degree longitude' in size.

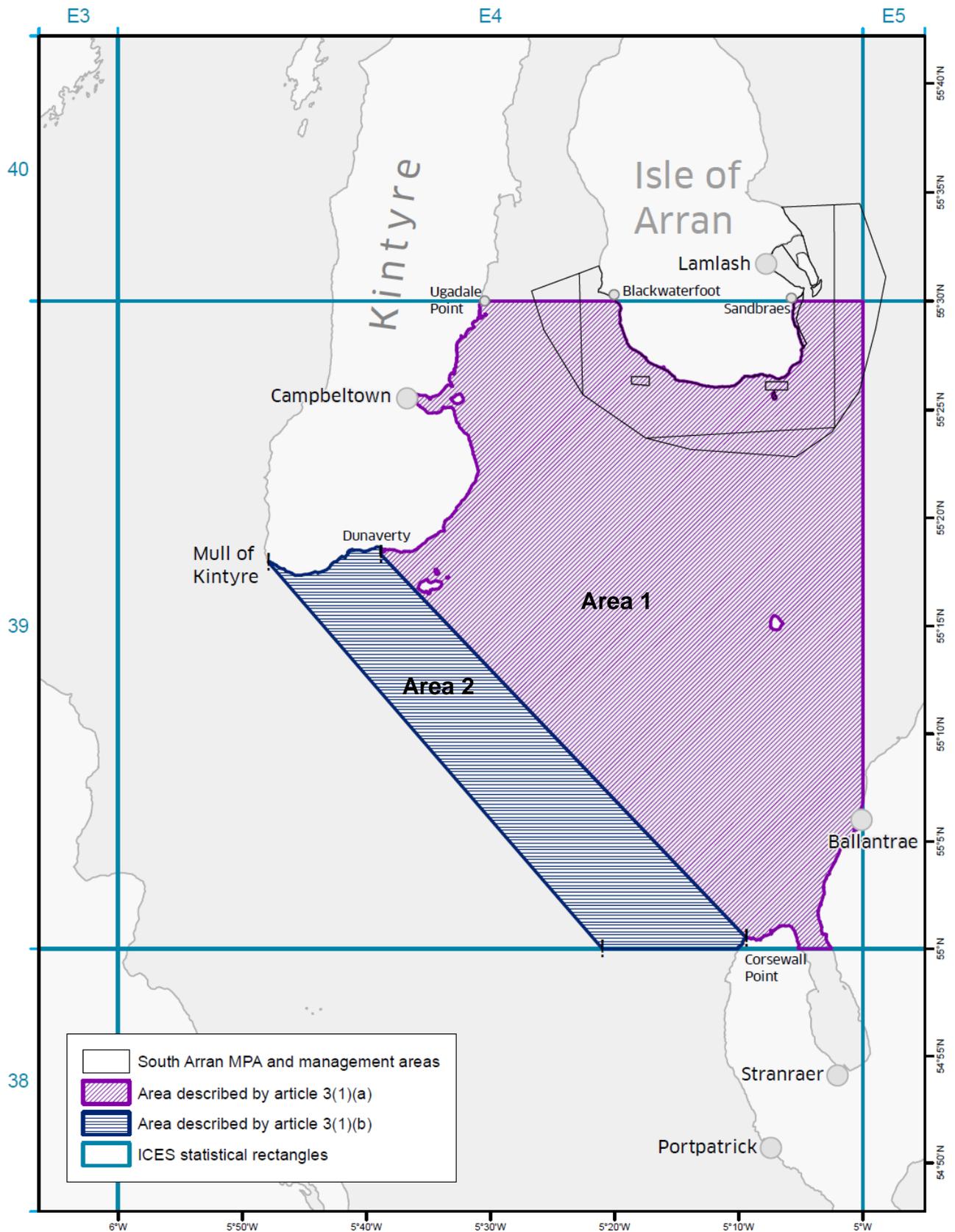
<sup>39</sup> South Arran MPA [fisheries management measures](#).

**What questions does the consultation seek to consider?**

10. Do you agree with the Scottish Government's view that it is appropriate to introduce a closure as in previous years for 2020/21?
11. Do you have any views on the exemptions applied?
12. Do you have any views on alternative or complementary measures that could be considered in the longer-term beyond 2020/21?

# Annex A

Illustrative map of the area.



NOT FOR NAVIGATION. Created by Scottish Government (Marine Scotland) 2015. gj1069. © Crown Copyright. Contains data © ICES  
 Projection: Mercator. Datum: WGS 1984. Standard Parallel: 55°0'0.00"N

## **Annex B**

### **Consultation period and responses to the consultation**

This **consultation will run for three weeks**, with a **closing date for responses of 20<sup>th</sup> September 2019**.

The consultation Respondent Information Form (RIF) (Annex C) should be completed and sent, by email if possible, to [Name redacted] at: [Personal data redacted]

Alternatively, write to: [Name redacted], Area 1B South, Victoria Quay, Edinburgh, EH6 6QQ

If you have any queries, please contact [Name redacted], [Position redacted] (tel: [redacted])

### **Handling your response**

We need to know how you wish your response to be handled. Please complete and return the Respondent Information Form which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately.

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review;
- inform the development of a particular policy;
- help decision to be made between alternative policy proposals; or,
- be used to finalise legislation before it is implemented.

Final decisions on the issues under consideration will, if appropriate, also take account of a range of other factors, including other available information. While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process; consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

### **Privacy**

Your responses, which will include personal information, are being processed as a public task. You have the right to object to this processing.

Your information will be held securely on the Scottish Government IT system and will only be accessible by authorised officials.

You have the right to ask for any personal information we hold about you.

We will only collect as much information about you as we need and will not share it with anyone outside of Scottish Government. If we share your responses, we will remove your personal details. We will only store your personal information for as long as we need it.

We will only contact you about your responses if you have given consent for us to do so. If you give consent for us to contact you then you have the right to withdraw that consent and you will no longer hear from us. We will continue to process your response information.

If you are unhappy about how your information is being handled then you can contact our data protection officer [dataprotectionofficer@gov.scot](mailto:dataprotectionofficer@gov.scot).

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (FOI) (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise. In the event of an FOI request, personal details would be redacted.

If you have any comments about how this consultation exercise has been conducted, please send them to the same address as for your response.

**Annex C  
Consultation on the Firth of Clyde Cod Spawning Closure  
2020/21**



**RESPONDENT INFORMATION FORM**

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

**1. Name/Organisation**

**Title** Mr  Ms  Mrs  Miss  Dr  **Please tick as appropriate**  
**Surname**

**Forename**

**2. Postal Address**

<input type="text"/>		
<b>Postcode</b>	<b>Phone</b>	<b>Email</b>

**3. Privacy**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**  **Yes**  **No**

**CONSULTATION QUESTIONS**

**Question 1:**

Do you agree with the Scottish Government's view that it is appropriate to introduce a closure as in previous years for 2020/2021?

Comments:

**Question 2:**

Do you have any views on the exemptions applied?

Comments:

**Question 3:**

Do you have any views on alternative or complementary measures that could be considered longer-term beyond 2020/21?

Comments:

**Ref – 005**

**marinescotland**

[Personal data redacted]



30<sup>th</sup> August 2019

Dear Sir/Madam

### **Firth of Clyde – Cod Spawning Closure - Spring 2020/21**

Since 2001, a specific area in the Firth of Clyde has been closed to fishing each year between 14<sup>th</sup> February and 30<sup>th</sup> April in order to protect spawning cod. The Scottish Government has responsibility for the closure which is implemented on a biennial basis via a Scottish Statutory Instrument (SSI). Exemptions have been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod that they catch.

This letter seeks your views on continuation of the closure in 2020/21 including the exemptions previously provided.

All respondents should be aware of the guidance in Annex B (which also explains how we will handle your response) and should complete the Respondent Information Form (RIF) at Annex C.

**The deadline for responses is 20<sup>th</sup> September 2019.**

We look forward to hearing your views.

Yours faithfully

[Name redacted]  
Sea Fisheries  
Marine Scotland  
30<sup>th</sup> August 2019

## CLYDE COD SPAWNING CLOSURE SPRING 2020/21

### Objective of the consultation

105. The Scottish Government has introduced a Scottish Statutory Instrument (SSI) each year from 2002-2019 to provide for the closure of a specified area of the Clyde to most types of fishing activity from 14 February to 30 April. The purpose of the closure, first introduced by the EU Fisheries Council in 2001, has been to protect spawning cod in the area. Exemptions have been provided for *Nephrops* trawlers, creels and scallop dredgers in the area due to the low amounts of cod they catch.
106. SSI 2017/450 providing for the current closure regime in 2018/19 is available online<sup>40</sup>.
107. This consultation seeks views on Scottish Government's proposal to continue the closure in 2020/21 including the exemptions previously provided.

### Desired aims

108. This document sets out the key issues that need to be considered in determining arrangements for 2020/21 and how the Scottish Government intends to proceed, subject to views received in response to this consultation.
109. The Scottish Government is requesting views on the continuation of a seasonal closure by means of an SSI. We are committed to supporting the recovery of cod stocks in Scottish waters and further afield. We wish to sustain appropriate measures that meet as far as possible the following aims:
- i. to offer effective protection to the local spawning cod stock, as a contribution to the wider recovery of cod stocks; and,
  - j. to complement, as far as possible, other west of Scotland cod recovery or other stock management measures.

### Effectiveness: precautionary approach

110. There has been little sign of improvement in the state of cod stocks in the west of Scotland in recent years.
111. As for many area closures of this type, it is relatively difficult to substantiate its precise biological effect. Some argue that the fact that the stock has yet to show significant signs of recovery means that it is imperative that the protection offered by the closure is maintained, because the stock remains vulnerable; others argue that the closure is not having a demonstrable substantial effect and should therefore be amended or discontinued.
112. The proposed closure area in the Clyde is within ICES<sup>41</sup> area 6a (West of Scotland)<sup>42</sup> which in 2019 has a TAC of 1735 tonnes for cod and a 10% bycatch limit. The latest scientific advice from ICES for cod in area 6a states that recruitment of cod has been low

---

<sup>40</sup> [www.legislation.gov.uk/ssi/2017/450/made/data.pdf](http://www.legislation.gov.uk/ssi/2017/450/made/data.pdf)

<sup>41</sup> International Council for the Exploration of the Sea.

<sup>42</sup> <http://www.ices.dk/sites/pub/Publication%20Reports/Advice/2019/2019/cod.27.6a.pdf>

since 2001 and is considered impaired and - when the maximum sustainable yield (MSY) approach is applied - there should be zero catches in each of the years 2020 and 2021.

113. In August 2015 a scientific paper entitled "*Evaluating the effectiveness of a seasonal spawning area closure*"<sup>43</sup> was published. The message from the study was that whilst the rationale for the spawning closure was sensible, it had no detectable impact on wider cod numbers. The paper concluded that this was probably due to the poor state of the stock when the closure was implemented and the continuing sources of fishing mortality other than fishing, as well as an increase in predators and competitors.
114. However, it has also been found that cod from the Clyde are reproductively isolated, having little detectable exchange with the northern spawning aggregations<sup>44,45</sup>. Genetic evidence also supports this population structure as Clyde cod were found to have a greater similarity to those from the Irish Sea than the cod from the northern aggregations<sup>46</sup>.
115. More recently a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association during the spawning period with demersal and pelagic gears. Although still in draft format the report shows the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time. A programme of work has been agreed for the study to continue biannually for 5 years.
116. Taking all of the available evidence into account the Scottish Government remains of the view that the closure does offer some necessary protection to spawning fish at a crucial stage in their life cycle. To remove closure provisions altogether would place wider cod stocks at unacceptable risk of further depletion, unless appropriate alternative measures were introduced in its place.
117. Scottish Ministers have committed to a programme of research and practical measures called 'Clyde 2020' to contribute to restoration of the Clyde marine ecosystem. The work will be overseen by a sub-group of the Clyde Marine Planning Partnership. Clyde 2020 will implement a programme of work to enhance the Clyde marine ecosystem and as part of this work it will consider what further management may be needed.
118. The terms of the current SSI are tailored to the particular requirements of the closure. The terms aim to provide legal protection for spawning cod at the correct time and place, and allow for some fishing activities to continue. Furthermore the closure complements other such closures in the region, including the Irish Sea closure which has taken place at the same time of year as the Clyde closure since 2001.

---

<sup>43</sup> <http://icesjms.oxfordjournals.org/content/early/2015/08/12/icesjms.fsv144.full.pdf+html>

<sup>44</sup> Wright, P. J., Galley, E., Gibb, I. M., and Neat, F. C. (2006) Fidelity of adult cod to spawning grounds in Scottish waters. *Fisheries Research*, 77: 148-158.

<sup>45</sup> Wright, P. J., Neat, F. C., Gibb, F. M., Gibb, I. M., and Thordarson, H. (2006) Evidence for metapopulation structuring in cod from the west of Scotland and North Sea. *Journal of Fish Biology*, 69: 181-199.

<sup>46</sup> Heath, M. R., Culling, M. A., Crozier, W. W., Fox, C. J., Gurney, W. S. C., Hutchinson, W. F., Nielsen, E. E., Wright, PJ, Calvalho, G. (2014). Combination of genetics and spatial modelling highlights the sensitivity of cod (*Gadus morhua*) population diversity in the North Sea to distributions of fishing. *ICES Journal of Marine Science*, 71: 794-807.

## Spatial extent of the closure

119. The proposal on which we are seeking views is to continue all of the provisions of the 2018/19 closure into 2020/21. As in previous years, the 2020/21 closure will provide for restriction in two areas from 14 February to 30 April (Annex A).
120. Area 1 is that part of ICES statistical rectangle 39E4 which lies to the east of the peninsula of Kintyre and to the north of a straight line between 55°18'18" north latitude, 05°38'50" west longitude, and 55°00'30" north latitude, 05°09'24" west longitude.
121. Area 2 is that part of ICES statistical rectangle 39E4 which lies to the north of a straight line between 55°17'57" north latitude, 05°47'54" west longitude and 55°00'00" north latitude, 05°21'00" west longitude and to the south of a straight line between 55°18'18" north latitude, 05°38'50" west longitude and 55°00'30" north latitude, 05°09'24" west longitude<sup>47</sup>.
122. The intention is to protect key spawning grounds and aggregations whilst leaving other areas, such as the North Channel, open with the aim of enabling fishermen to work elsewhere during the closure.

## Exemptions

123. The following exemptions have been provided in previous years:
- Area 1: *Nephrops* trawlers, scallop dredgers and creel vessels;
- Area 2: Scallop dredgers and creel vessels.
124. For the 2020/21 closure, the Scottish Government proposes to retain these exemptions.
125. Note that exemptions do not apply in areas within the South Arran MPA where other fisheries management measures are in place<sup>48</sup>. Furthermore, consultations are due to take place in 2019 regarding fisheries measures for the Clyde Sea Sill MPA. In future, exemptions may therefore also not apply in areas within the Clyde Sea Sill MPA where other fisheries management measures may be introduced.

## Conclusion

126. The Scottish Government considers that it would be appropriate to continue the provisions for the closure in previous years into 2020/21.
127. Views are invited on all issues raised in this paper and responses to the questions posed in Annex C. **We would ask for views to be received no later than 20<sup>th</sup> September 2019.**

---

<sup>47</sup> These are co-ordinates of latitude and longitude according to the World Geodetic System 1984 ("WGS 84"). WGS84 is defined at paragraph 2.1 of the United States National Imagery and Mapping Agency Technical Report TR8350.2, third edition, amendment 1 of 3rd January 2000 entitled "Department of Defense World Geodetic System 1984" (<http://earth-info.nga.mil/GandG/publications/tr8350.2/wgs84fin.pdf>). International Council for the Exploration of the Seas (ICES) standardise the division of sea areas for statistical analysis. Each ICES statistical rectangle is '30 min latitude by 1 degree longitude' in size.

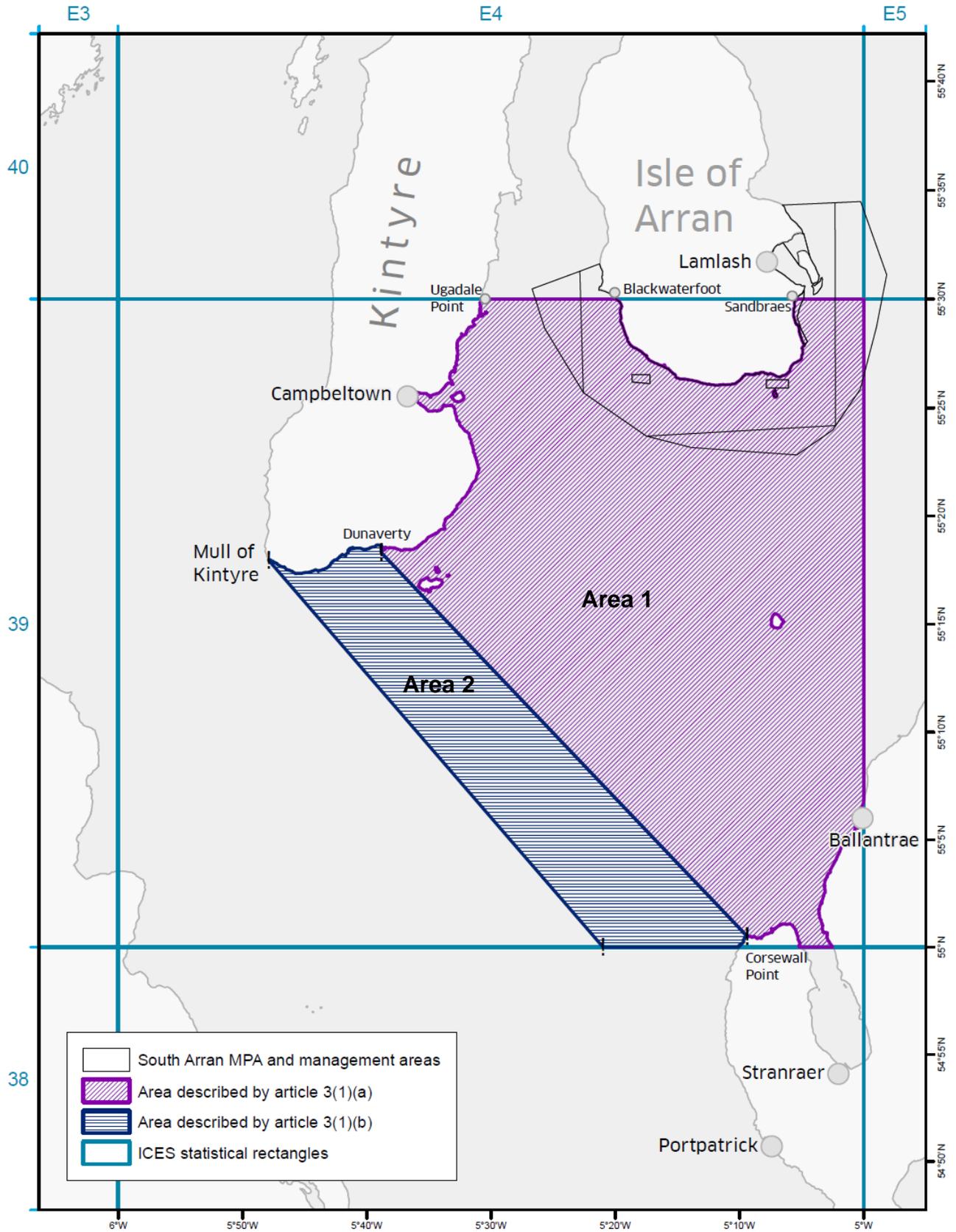
<sup>48</sup> South Arran MPA [fisheries management measures](#).

**What questions does the consultation seek to consider?**

13. Do you agree with the Scottish Government's view that it is appropriate to introduce a closure as in previous years for 2020/21?
14. Do you have any views on the exemptions applied?
15. Do you have any views on alternative or complementary measures that could be considered in the longer-term beyond 2020/21?

# Annex A

Illustrative map of the area.



NOT FOR NAVIGATION. Created by Scottish Government (Marine Scotland) 2015. gj1069. © Crown Copyright. Contains data © ICES  
 Projection: Mercator. Datum: WGS 1984. Standard Parallel: 55°0'0.00"N

## **Annex B**

### **Consultation period and responses to the consultation**

This **consultation will run for three weeks**, with a **closing date for responses of 20<sup>th</sup> September 2019**.

The consultation Respondent Information Form (RIF) (Annex C) should be completed and sent, by email if possible, to [Name redacted] at: [Personal information redacted]

Alternatively, write to: [Name redacted], Area 1B South, Victoria Quay, Edinburgh, EH6 6QQ

If you have any queries, please contact [Name redacted], [Position redacted] (tel: [redacted])

### **Handling your response**

We need to know how you wish your response to be handled. Please complete and return the Respondent Information Form which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately.

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review;
- inform the development of a particular policy;
- help decision to be made between alternative policy proposals; or,
- be used to finalise legislation before it is implemented.

Final decisions on the issues under consideration will, if appropriate, also take account of a range of other factors, including other available information. While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process; consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

### **Privacy**

Your responses, which will include personal information, are being processed as a public task. You have the right to object to this processing.

Your information will be held securely on the Scottish Government IT system and will only be accessible by authorised officials.

You have the right to ask for any personal information we hold about you.

We will only collect as much information about you as we need and will not share it with anyone outside of Scottish Government. If we share your responses, we will remove your personal details. We will only store your personal information for as long as we need it.

We will only contact you about your responses if you have given consent for us to do so. If you give consent for us to contact you then you have the right to withdraw that consent and you will no longer hear from us. We will continue to process your response information.

If you are unhappy about how your information is being handled then you can contact our data protection officer [dataprotectionofficer@gov.scot](mailto:dataprotectionofficer@gov.scot).

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (FOI) (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise. In the event of an FOI request, personal details would be redacted.

If you have any comments about how this consultation exercise has been conducted, please send them to the same address as for your response.

**Annex C  
Consultation on the Firth of Clyde Cod Spawning Closure  
2020/21**



**RESPONDENT INFORMATION FORM**

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately

**1. Name/Organisation**

**Title** Mr  Ms  Mrs  Miss  Dr  **Please tick as appropriate**  
**Surname**

**Forename**

**2. Postal Address**

<input type="text"/>		
<b>Postcode</b>	<b>Phone</b>	<b>Email</b>

**3. Privacy**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

**Please tick as appropriate**  **Yes**  **No**

**CONSULTATION QUESTIONS**

**Question 1:**

Do you agree with the Scottish Government's view that it is appropriate to introduce a closure as in previous years for 2020/2021?

Comments:

**Question 2:**

Do you have any views on the exemptions applied?

Comments:

**Question 3:**

Do you have any views on alternative or complementary measures that could be considered longer-term beyond 2020/21?

Comments:

[Attachment presented separately] 055

**From:** [Name redacted]  
**Sent:** 15 September 2021 08:51  
**To:** [Names redacted]  
**Subject:** FW: Clyde cod spawning consultation

Morning Both,

Would you please be able to send the email below and attached doc around the FMAC and IFMAC mailing lists please?

Thanks!

[Name redacted]

**From:** [Name redacted]  
**Sent:** 15 September 2021 08:48  
**To:** [Names redacted]  
**Subject:** Clyde cod spawning consultation

Dear All,

Please find attached a consultation letter seeking views on the continuation of the seasonal closure (14 February – 30 April) in the Firth of Clyde to protect spawning cod during 2022 and 2023.

If you have any comments, please forward them to me by **Wednesday 13 October 2021** using the respondent information form found within the letter.

Please feel free to share this letter with any other parties who may hold an interest.

Kind regards,

[Name redacted]  
[Name redacted]  
**[Position redacted]**  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 01 November 2021 11:45  
**To:** [Names redacted]  
**Cc:** [Names redacted]  
**Subject:** FW: Clyde Cod Surveys

Hi All,

We're still chasing round in circles on the Clyde cod reports. [Name redacted] still seems to think the previous reports have been published on our website. Does anyone have any recollection of this happening?

Also in terms of resource for a meeting to get the latest report finalised – what is required for this, and is this likely to be able to happen any time soon?

Many Thanks,

[Name redacted]

**From:** [Name redacted]

**Sent:** 01 November 2021 10:59

**To:** [Name redacted]

**Cc:** [Names redacted] ; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; [Names redacted]

**Subject:** Re: Clyde Cod Surveys

Hello All,

For clarity, what previously happened was [Names redacted] came on trials and wrote up findings. There would then be a meeting called where Marine Scotland would look over the results with CFA and St Andrews Scientists, any points would be picked up on the report or it was simply agreed, then a forward rough plan would be made and agreed for the next surveys. This would also be the point that any reports were published on the Marine Scotland website.

About 3 years ago there was an issue with funding and resourcing, not from the CFA side as we were keen to keep the work going and support it, but it was a lack of resource I believe at MS Labs and related to funding cycles. It was expected at the time to be a short term issue, and although no firm commitments were given there was good will to keep the work going if possible. It was noted at the time missing a year wouldn't impact the data too much in any case.

Of course this was followed by Covid, and Brexit issues. This has resulted in the normal meeting we would have had after the last trials not happening, although we have requested this a number of times we do appreciate Marine Scotland resources and time were limited to take a meeting forward. We do hope we can have one shortly to go over the last reports. Usually after the meeting the reports would be available online through the Marine Scotland website.

In addition there has been a collection of otoliths which have been maintained from the trials but not aged etc. That might be a piece of work we want to collectively consider going forward.

So really from our perspective we have passed the report from St Andrews on to Marine Scotland, and we would hope at some point soon to have a meeting to go over the report and consider any future work if possible. We would be happy for a date to be set and we can work around everyone's best availability.

We wouldn't have passed the report out until we had the trials wash up meeting collaboratively, and as previously we would expect it would then be available on the MS website.

Many thanks,

[Name redacted]

On Mon, 1 Nov 2021, 10:41 [Name redacted] wrote:

Hello [Name redacted]

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name redacted]

[Name redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name redacted], I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name redacted]

[Name redacted]

**[Position redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 14 October 2021 13:28  
**To:** [Name redacted]  
**Subject:** FW: Clyde Cod report

For awareness – you weren't on the distribution list...

**From:** [Name redacted]  
**Sent:** 14 October 2021 12:53  
**To:** [Name redacted]  
**Cc:** [Name redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; [Names redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name redacted]

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name redacted]

On Thu, 14 Oct 2021, 12:46 [Name redacted] wrote:

Hello [Name redacted]

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 11:54  
**To:** [Name redacted]  
**Subject:** FW: Clyde Cod report

**From:** [Name redacted]  
**Sent:** 26 October 2021 19:06

**To:** [Name redacted]

**Subject:** Re: Clyde Cod report

Hello [Name redacted]

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

[Name redacted]

On Tue, 26 Oct 2021, 18:49 [Name redacted] wrote:

Hi [Name redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

[Name redacted]

**From:** [Name redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name redacted]

**Cc:** [Name redacted]; [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); Copy: [Names redacted] **Subject:** Re: Clyde Cod report

Hello [Name redacted]

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name redacted]

On Thu, 14 Oct 2021, 12:46 [Name redacted] wrote:

Hello [Name redacted]

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 17:47  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** FW: Clyde Cod report

Hi [Name redacted]

Sorry, I know Clyde cod will be the last thing on your mind at the end of a long day of trilateral...

This all seems very odd but just following on from [Name redacted] email – I don't know why [Name redacted] doesn't have copies, why she hasn't produced them for us when asked in the past or why she hasn't signposted any of us to St Andrews Uni if she doesn't hold them. All feels like a very odd goose chase.

But anyway, if you're happy I can get in touch with [Name redacted] and ask for copies of any earlier reports, and pass on anything he sends to Open seas and SIFT? In hindsight wish I'd known to get in touch with him sooner...

Thanks  
[Name redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 17:00  
**To:** [Names redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name redacted]

I've asked around here – we think this refers to the St Andrews Uni Clyde cod surveys, and we don't recall an MS (or MSS) report on them. The survey was led by [Name redacted] so he might be able to help.

Cheers - [Name redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 16:14  
**To:** [Name redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Thanks [Name redacted]

I don't have the reports.

Can those of the copy list do a wee trawl. Would be good to try and put this to bed.

Thanks

[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 08:34  
**To:** [Name redacted]  
**Cc:** [Name redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name redacted]

[Name redacted] spoke to [Name redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name redacted] couldn't provide the older published versions.

Thanks

[Name redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 17:39  
**To:** [Names redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name redacted]

Just wondering if anyone is picking this up, in touch with [Name redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name redacted]

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

[Name redacted]

On Tue, 26 Oct 2021, 18:49 [Name redacted] wrote:

Hi [Name redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

[Name redacted]

**From:** [Name redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name redacted]

**Cc:** [\[Name redacted\]](#); [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); Copy: [Names redacted]

**Subject:** Re: Clyde Cod report

Hello [Name redacted]

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name redacted]

On Thu, 14 Oct 2021, 12:46 [Name redacted] wrote:

Hello [Name redacted]

I hope this finds you well.

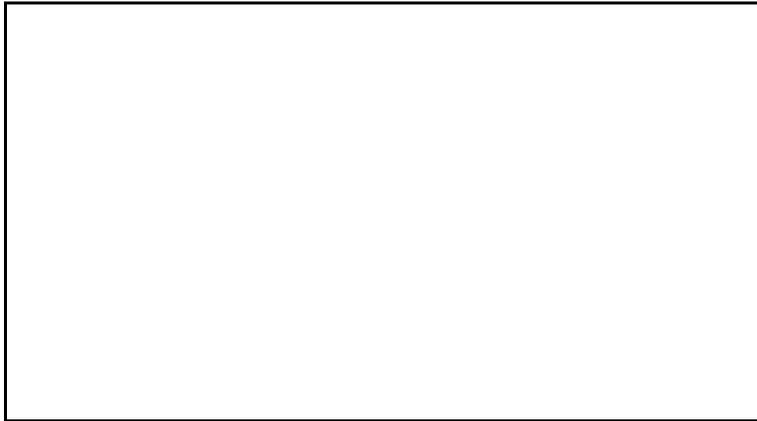
We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name redacted]



[Personal data redacted]

[A Scottish Charitable Incorporated Organisation SC045699](#) | [Sign up for our newsletter <<](#)

**From:** [Name redacted]  
**Sent:** 02 November 2021 11:10  
**To:** [Name redacted]  
**Cc:** [Name redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Apologies for the slow response. Let's wait until you are both back at your desks and you could perhaps suggest some potential meeting dates for us to consider?

In the meantime, please consider the below a request under the Freedom of Information Scotland Act 2002, including the Environmental Information (Scotland) Regulations 2004:

1. Please provide a copy of the study undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association referenced at paragraph 11 of the current Clyde Cod Spawning Closure Consultation ( available <https://www.gov.scot/publications/clyde-cod-spawning-closure-2022-23-consultation/documents/> );
2. All correspondence within Marine Scotland and between Marine Scotland and external parties with reference to this study, since 1<sup>st</sup> January 2019.

I would be grateful of an acknowledgement that this FOI has been lodged.

Kind regards

[Name redacted]  
[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 29 October 2021 15:20  
**To:** [Name redacted]

**Cc:** [Name redacted]; [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Allan and I will be in Norway next week, what is your availability Tuesday to have a MS Teams meeting? It might need to be evening for us to schedule around other meeting. Does that work for you?

Best regards, [Name redacted]

[Personal data redacted]

**From:** [Name redacted]

**Sent:** 28 October 2021 10:18

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thanks [Name redacted], yes happy to schedule a call with Allan about this. But in the meantime may I suggest once again that we would be very grateful for a copy of the report by over the course of the next few days, in time to allow it to be considered ahead of the consultation close, and to save us all going through the FOI process.

Kind regards

[Name redacted]

[Name redacted]

**[Personal data redacted]**

Get [Outlook for iOS](#)

---

**From:** [Name redacted]

**Sent:** Wednesday, October 27, 2021 12:05:41 PM

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Written concerns should be addressed to Allan Gibb ([allan.gibb@gov.scot](mailto:allan.gibb@gov.scot)), however if it would be helpful to discuss the issue first I can arrange for you to speak to [Name redacted] and Allan Gibb.

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 10:34

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

[Name redacted]

[Name redacted]

**[Personal data redacted]**

**From:** [Name redacted]

**Sent:** 27 October 2021 10:21

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 09:59

**To:** [Name redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

[Name redacted]

---

**From:** [Name redacted]

**Sent:** 19 October 2021 13:05

**To:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]

[Name redacted]

**[Personal data redacted]**

**From:** [Name redacted]

**Sent:** 13 October 2021 13:53

**To:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name redacted]

[Name redacted]

**[Position redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]



**From:** [Name redacted]

**Sent:** 13 October 2021 13:49

**To:** [Name redacted]

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name redacted]

[Name redacted]

**[Personal data redacted]**

**From: (Name Redacted)**

**Sent:** 19 October 2021 15:10

**To: (Name Redacted)**

**Cc: (Name Redacted)**

**Subject:** FINAL PDF - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

Great, thanks for confirming.

I have now attached the final PDF for your records. This has been sent to our Digital Media Team to upload and queue for tomorrows publication.

The HTML will follow as soon as possible.

I have attached a list of acronyms that have been automatically generated from your document. Can you please complete and amend where necessary. As these are required to complete the HTML conversion, it would be ideal if you could return this as soon as possible.

Please can you let me know what the letter should be titled in the HTML contents list?

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact  
Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



A dark blue banner for APS Group. On the left is the APS Group logo. To its right is the text 'MAKING MORE POSSIBLE FOR OUR CLIENTS FOR OVER 60 YEARS'. On the far right is a white button with the text 'FIND OUT MORE'.

**From: (Name Redacted)**

**Sent:** 19 October 2021 09:11

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: PDF VERSION - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

I have just completed the SG Web Registration Form. I have set the date as tomorrow (20<sup>th</sup>) and the time as 12:00 noon.

Thanks

**(Name Redacted)**

**From: (Name Redacted)**

**Sent:** 19 October 2021 08:55

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: PDF VERSION - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

Not a problem, we'll get that sorted.

If you could let me know once you have completed the SG Web Registration Form that would be great.

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**From: (Name Redacted)**

**Sent:** 19 October 2021 08:46

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: PDF VERSION - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

Thanks – sorry that I hadn't spotted that sooner! Please find attached a PDF with the change marked up.

Many thanks

**(Name Redacted)**

**From: (Name Redacted)**

**Sent:** 19 October 2021 08:41

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: PDF VERSION - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

No problem, we can make this change then send the files straight to our Digital Media Team to prepare for tomorrow's publication date.

Could you please provide a marked-up PDF detailing the change required? I will then ask our Studio to amend this ASAP.

I will also get the SG Web Registration Form over to you shortly to complete. This will enable you to schedule publication with SG.

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**From: (Name Redacted)**

**Sent:** 19 October 2021 08:39

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: PDF VERSION - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

We have reviewed the PDF and are happy with it. There's just one minor thing I've noticed that I let slip through – ideally the date on the top of the letter on page 1 should have been updated. If it's possible could this be updated to today's date? If not, it's not a big deal. Apart from that it all looks great.

Many thanks

**(Name Redacted)**

**From: (Name Redacted)**

**Sent:** 18 October 2021 16:47

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** PDF VERSION - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

I have attached the PDF version for your approval. In order to meet Wednesdays publication date we would ideally be looking sign-off on this version by 10am tomorrow if possible.

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



A dark blue banner for APS Group. On the left is the APS Group logo. In the center, the text reads 'MAKING MORE POSSIBLE FOR OUR CLIENTS FOR OVER 60 YEARS'. On the right is a white button with the text 'FIND OUT MORE'.

**From: (Name Redacted)**

**Sent:** 18 October 2021 09:17

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** ACCESSIBILITY REPORT - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

Our Content Quality & Accessibility Analysts have carried out an accessibility check on your document and have some comments, detailed in the attached report.

Please can you incorporate these changes into the document, in order to ensure that it complies with SG accessibility guidelines.

Once you get the revised document back to me, I will put this into our Studio for a PDF version as soon as possible.

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



MAKING MORE POSSIBLE FOR  
OUR CLIENTS FOR OVER 60 YEARS

FIND OUT MORE

**From: (Name Redacted)**

**Sent:** 18 October 2021 08:52

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** COST ESTIMATE - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi **(Name Redacted)**

I have attached an estimate for the web conversion of your forthcoming document and to assist you to raise a **purchase order number**. Please note this estimate is subject to change depending on the amount of work required.

Our estimate is based on PDF and HTML conversion of your supplied word document inclusive of brand check, addition of ISBN, and product code to conform with SG website guidelines.

I have passed your document to our Content Quality & Accessibility Analysts for an accessibility check and will get any comments back to you as soon as possible.

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**MAKING MORE POSSIBLE FOR  
OUR CLIENTS FOR OVER 60 YEARS**

[FIND OUT MORE](#)

**From: (Name Redacted)**

**Sent:** 18 October 2021 08:08

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: Consultation Query

Good Morning **(Name Redacted)**

Please find attached an updated version of the consultation document and the publishing form.

Kind regards,

**(Name Redacted)**

**From: (Name Redacted)**

**Sent:** 15 October 2021 16:47

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: Consultation Query

Hi **(Name Redacted)**

No problem, when you get the Publishing Form and final document over to me, I will put this in for an accessibility check ASAP on Monday.

Enjoy your weekend when it comes!

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street

Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**From: (Name Redacted)**

**Sent:** 15 October 2021 16:40

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: Consultation Query

Hi **(Name Redacted)**

Thanks for getting back to me. Apologies for the delay in getting back to you. I have been working on updating the consultation document and completing the publishing form, but am still waiting for clearance to send them back to you. We'll get them to you as soon as possible!

Kind regards,

**(Name Redacted)**

**From: (Name Redacted)**

**Sent:** 15 October 2021 13:32

**To: (Name Redacted)**

**cc: (Name Redacted)**

**Subject:** RE: Consultation Query

Hi **(Name Redacted)**

Thanks for getting this over to me. There are some accessibility issues within the publication, so I will pass your document to our Content Quality & Accessibility Analysts for an accessibility check and will get any comments back to you as soon as possible. In order to do this, please can you complete the Publishing Form attached and return as soon as possible. This will also allow me to provide you with an estimate.

In terms of timescales, this will largely depend on when you are able to sign-off on the PDF with no further changes.

I should be able to get the accessibility comments back to you by COP today. If you could make these amends and get the document back to me early on Monday we will be able to get a PDF version back to you by COP Monday.

Once you confirm that you are happy to proceed, I will get an SG Web Registration Form over to you to complete which is required to schedule publication. We typically request sign-off with no further changes by 10am the day prior to publication. The PDF can then publish with the HTML to follow as soon as possible – does this approach suit?

I note that the document doesn't contain the 'Responding to this consultation' text. Please can you insert that into this document. The [URL] in this can be obtained from the Digital Engagement Team **(Contact Details Redacted)** who you will need to flag this consultation with, if you have not done so already.

We would encourage that some text is added to the document just flagging that whilst previously the closing date was the 13<sup>th</sup>, this has now been extended to the new closing date.

Thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



A dark blue banner for APS Group. On the left is the APS Group logo. To its right is the text 'MAKING MORE POSSIBLE FOR OUR CLIENTS FOR OVER 60 YEARS'. On the far right is a white button with the text 'FIND OUT MORE'.

**From: (Name Redacted)**

**Sent:** 15 October 2021 13:07

**To: (Name Redacted)**

**Cc: (Name Redacted)**

**Subject:** RE: Consultation Query

Hi **(Name Redacted)**

Many thanks for getting back to me so quickly. I have attached the consultation document for you to have a look at.

Many thanks

**(Name Redacted)**

**From: (Name Redacted)**

**Sent:** 15 October 2021 12:05

**To: (Name Redacted)**

**Cc: (Name Redacted)**

**Subject:** RE: Consultation Query

Hi **(Name Redacted)**,

Thank you for your enquiry. As your consultation is for web only publication, your request has been passed to me to take forward.

Please find attached a copy of our Web Publishing Form for you to complete and return to assist APS to register, estimate and schedule publication.

Please can you supply us with the draft version of your document. We would then ask our Studio to take a look at this and run an accessibility report to make sure it complies with SG accessibility guidelines.

If no formatting/design work is required we would typically ask for 7-10 working days from when you provide the final document to the date of publication. However you have mentioned that this needs to be expedited, which we can do. Please can you provide the document so I can give a better indication of the time needed.

As your consultation will be published on the SG website, you should note the following important information, particularly notes 2, 3 and 4.

#### **Advisory information**

**1. Scottish Government Accessible Publications** – SG follow accessibility guidelines as endorsed by Scottish Accessible Information Forum (SAIF) and the Scottish Government Equality Unit and which are underpinned by legislation. To assist you to prepare your final document to conform, I have linked a copy of the **(Link Redacted)**

**2. SG Digital Engagement Team.** Due to recent changes affecting website hosting on Citizen Space of SG consultation documents, your consultation must be flagged to the team as early as possible. You can do this by emailing **(Contact Details Redacted)**

**3. Respondent Information Form (RIF)** – Consultations should always have an RIF. The latest version of this (word document) is attached.

**4. Responding to this consultation** – The Scottish Government has recently approved wording regarding how to respond to consultations, which I have attached. This must be incorporated within your document.

**5. Cover** – To comply with SG Web publishing guidelines, your report will be collated with a standard SG Web cover inclusive of Scottish Government copyright information, required ISBN and DPPAS Product Code.

**6. Acronyms** – If your document contains acronyms, these will be identified during our web conversion quality check and you will be sent a table listing them. APS may be able to populate some or all definitions from our acronym database, however, you will need to check and complete this table and return as quickly as possible to avoid any delay in publication.

**7. SG Web Registration** – After allocation of your publication’s ISBN we will be send you a link to an SG Web Publications online form which you must complete, confirming publication date and time, to allow publication.

In the meantime, please do not hesitate to email me should you require clarification.

Kind Regards,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**(Contact Details Redacted)**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**From:** (Name Redacted)

**Sent:** 15 October 2021 11:29

**To:** (Name Redacted)

**Cc:** (Name Redacted)

**Subject:** Consultation Query

**Importance:** High

Good Morning,

I'm just off the phone to you and popping this in an email as advised.

I'm looking for some advice on how quickly a consultation document could be put on the website? We have run it as an informal stakeholder consultation, but we have been challenged that it should have been made publically available online, and our

legal team have now recommended that we put it up online for a further 2 week period. Timings are becoming quite tight so we really need to get it online as soon as possible. I'm just wondering how quickly you would be able to turn this around?

I'd really appreciate it if someone could get back to me as soon as possible.

Many thanks,

**(Name Redacted)**

**(Name Redacted)**

**(Position Redacted)**

Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**(Contact details Redacted)** | W: [www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)



**From: (Name redacted)**

**Sent:** 27 October 2021 10:21

**To:(Name redacted)**

**cc: (Name redacted)**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **(Name redacted)**

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

**(Name redacted)**

**From: (Name redacted)**

**Sent:** 27 October 2021 09:59

**To: (Name redacted)**

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **(Name redacted)**

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

**(Name redacted)**

---

**From: (Name redacted)**

**Sent:** 19 October 2021 13:05

**To: (Name redacted)**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you **(Name redacted)**, I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

**(Name redacted)**

**(Position redacted)SIFT**

**(Contact details redacted)**

**From: (Name redacted)**

**Sent:** 13 October 2021 13:53

**To: (Name redacted)**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi **(Name redacted)**

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

**(Name redacted)**

**(Position redacted)**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**(Contact details redacted)**

W: [www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

**From:** (Name redacted)

**Sent:** 13 October 2021 13:49

**To:** (Name redacted)

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear (Name redacted)

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

(Name redacted)

(Position redacted)

SIFT

**Please note new email address:** (Name redacted)

(Contact details redacted)

**From:** [Name Redacted]

**Sent:** 01 November 2021 12:36

**To:** [Name Redacted]

**Cc:** [Name Redacted]

**Subject:** Clyde Cod Query

Hello [Name Redacted]

How are you? Hope all's good!

Just want to test your memory on Clyde cod...do you have any recollection of publishing any Clyde cod survey reports on our website? It would have been before my time if so. [Name Redacted] is insisting that they have been, but [Name Redacted] and [Name Redacted] have no recollection [Name Redacted] and searches haven't dredged anything up. I've only seen drafts of reports in eRDM – no final versions that could have been published. We're having a bit of a wild goose chase...

Thanks!

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact details Redacted] W: [www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

**From:** [Name Redacted]  
**Sent:** 19 July 2021 19:51  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** Re: Clyde Cod Report

Hello [Name Redacted]

Thank you for getting back to me so quickly. I have emailed to follow up on the writing up of the trials, I believe the team lead became longterm sick just before Covid-19, but the work should be concluded.

I'll be back in touch as soon as I have a copy.

Many thanks,

[Name Redacted]

- - - -

**W** [www.clydefish.com](http://www.clydefish.com)  
**E** [contact@clydefish.com](mailto:contact@clydefish.com)  
**T** [twitter.com/cfascot](https://twitter.com/cfascot)  
**F** [facebook.com/clydefishermen](https://facebook.com/clydefishermen)

**Learn more about Clyde Fishermen on our YouTube Channel** [https://www.youtube.com/watch?v=AOe\\_yUiWxqo](https://www.youtube.com/watch?v=AOe_yUiWxqo)

On Mon, Jul 19, 2021 at 1:29 PM [Name Redacted]:

Hi [Name Redacted]

I hope you are well. [Name Redacted] mentioned that she had a chat with you earlier and that she had mentioned we are looking at the Clyde Cod SSI renewal at the moment. Do you have any update on the study run by CFA and the Scottish Oceans Institute. I appreciate that there probably won't have been much done during the last year and a half, but I think I recall that you were awaiting the draft updated report last time we were consulting on this, in 2019. Could you please send this through to us, or any further updates since if you have them?

Many thanks

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact details redacted] | W: [www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)



**From:** [Name redacted]  
**Sent:** 28 October 2021 10:18  
**To:** [Names redacted]  
**Cc:** [Name redacted]  
**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thanks [Name redacted], yes happy to schedule a call with Allan about this. But in the meantime may I suggest once again that we would be very grateful for a copy of the report by over the course of the next few days, in time to allow it to be considered ahead of the consultation close, and to save us all going through the FOI process.

Kind regards

[Name redacted]  
[Name redacted]  
[Personal data redacted]

Get [Outlook for iOS](#)

---

**From:** [Name redacted]  
**Sent:** Wednesday, October 27, 2021 12:05:41 PM  
**To:** [Names redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Written concerns should be addressed to Allan Gibb ([allan.gibb@gov.scot](mailto:allan.gibb@gov.scot)), however if it would be helpful to discuss the issue first I can arrange for you to speak to [Name redacted] and Allan Gibb.

Kind regards,

[Name redacted]  
**From:** [Name redacted]  
**Sent:** 27 October 2021 10:34

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

[Name redacted]

[Name redacted]

[Personal data redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 10:21

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 09:59

**To:** [Name redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

[Name redacted]

---

**From:** [Name redacted]

**Sent:** 19 October 2021 13:05

**To:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]

[Name redacted]

[Personal data redacted]

**From:** [Name redacted]

**Sent:** 13 October 2021 13:53

**To:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name redacted]

[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal data redacted]



**From:** [Name redacted]  
**Sent:** 13 October 2021 13:49  
**To:** [Name redacted]  
**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name redacted]  
[Name redacted]  
[Personal data redacted]  
**From:** [Name redacted]  
**Sent:** 27 October 2021 10:34  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

[Name redacted]

[Name redacted]

[Personal data redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 10:21

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 09:59

**To:** [Name redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

[Name redacted]

---

**From:** [Name redacted]  
**Sent:** 19 October 2021 13:05  
**To:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]  
[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 13 October 2021 13:53  
**To:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name redacted]

[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal data redacted]



**From:** [Name redacted]  
**Sent:** 13 October 2021 13:49  
**To:** [Name redacted]  
**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name redacted]

[Name redacted]

**[Personal data redacted]**

**From:** [Name redacted]

**Sent:** 27 October 2021 10:05

**To:** [Names redacted]

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Morning,

Another email from SIFT below. Have you had a chance to review the draft response to their previous email that I sent you on Friday?

Thanks

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 09:59

**To:** [Name redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

[Name redacted]

---

**From:** [Name redacted]

**Sent:** 19 October 2021 13:05

**To:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]

[Name redacted]

**[Personal data redacted]**

**From:** [Name redacted]  
**Sent:** 13 October 2021 13:53  
**To:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name redacted]

[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal data redacted]



**From:** [Name redacted]  
**Sent:** 13 October 2021 13:49  
**To:** [Name redacted]  
**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name redacted]  
[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 12:06  
**To:** [Names redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Written concerns should be addressed to Allan Gibb ([allan.gibb@gov.scot](mailto:allan.gibb@gov.scot)), however if it would be helpful to discuss the issue first I can arrange for you to speak to [Name redacted] and Allan Gibb.

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 10:34

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

[Name redacted]

[Name redacted]

**[Personal data redacted]**

**From:** [Name redacted]

**Sent:** 27 October 2021 10:21

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 09:59

**To:** [Name redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

[Name redacted]

---

**From:** [Name redacted]

**Sent:** 19 October 2021 13:05

**To:** [Name redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]

[Name redacted]

[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 13 October 2021 13:53  
**To:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name redacted]

[Name redacted]  
**[Position redacted]**  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal details redacted]



**From:** [Name redacted]  
**Sent:** 13 October 2021 13:49  
**To:** [Name redacted]  
**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name redacted]  
[Name redacted]  
**[Personal data redacted]**

**From:** [Name Redacted]  
**Sent:** 27 October 2021 11:53  
**To:** [Name Redacted]  
**Subject:** FW: FW: Clyde cod spawning consultation

**From:** [Name Redacted]  
**Sent:** 27 October 2021 11:47  
**To:** [Name Redacted]  
**Cc:** [Names Redacted] >  
**Subject:** RE: FW: Clyde cod spawning consultation

Hello [Name Redacted],

All noted - thanks for explaining and we look forward to seeing the study in due course. Unfortunately, this does not allay our concern about transparency, ie that a public consultation is potentially being influenced by the inclusion of the Scottish Government's stated views (para 12 in the consultation document) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

Also, the Clyde Fishermen's Association have said that "previous reports" from Clyde cod surveys have been published on the Scottish Government's website. I have asked for links, but was referred to finding them via a Google search. I can find no trace of them online. Would you or MSS colleagues be able to share links to these previous reports?

Kind regards,

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 27 October 2021 10:28  
**To:** [Name Redacted]  
**Cc:** [Names Redacted]  
**Subject:** RE: FW: Clyde cod spawning consultation

Dear [Name Redacted],

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 14 October 2021 18:37  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: FW: Clyde cod spawning consultation

Hello [Name Redacted],

Just a quick follow up.

We note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

We have requested the document from the Clyde Fishermen's Association today, but one of their representatives has said it is unavailable at this time. You and Marine Scotland colleagues were cc'd into this correspondence.

However, this would seem to contradict the guidance in the Government's consultation document which indicates that the report would be made accessible to stakeholders on request.

Noting our concern that a public consultation is potentially being influenced by the inclusion of the government's stated views (para 12) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders, are you able to share the report?

Kind regards,

[Name Redacted]  
**From:** [Name Redacted]  
**Sent:** 12 October 2021 21:06  
**To:** [Names Redacted]  
**Subject:** Re: FW: Clyde cod spawning consultation

Dear [Name Redacted],

Many thanks for the opportunity to feed into this consultation, please find a consultation response from Open Seas attached.

Please let me know if anything is unclear or you would like any further information on any of the points raised.

With best wishes,

[Name Redacted]

Dear All,

Please find attached a consultation letter seeking views on the continuation of the seasonal closure (14 February – 30 April) in the Firth of Clyde to protect spawning cod during 2022 and 2023.

If you have any comments, please forward them to me by **Wednesday 13 October 2021** using the respondent information form found within the letter.

Please feel free to share this letter with any other parties who may hold an interest.

Kind regards,

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**[Contact Details Redacted]**

**From:** [Name redacted]

**Sent:** 27 October 2021 11:47

**To:** [Name redacted]

**Cc:** [Names redacted]

**Subject:** RE: FW: Clyde cod spawning consultation

Hello [Name redacted]

All noted - thanks for explaining and we look forward to seeing the study in due course. Unfortunately, this does not allay our concern about transparency, ie that a public consultation is potentially being influenced by the inclusion of the Scottish Government's stated views (para 12 in the consultation document) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

Also, the Clyde Fishermen's Association have said that "previous reports" from Clyde cod surveys have been published on the Scottish Government's website. I have asked for links, but was referred to finding them via a Google search. I can find no trace of them online. Would you or MSS colleagues be able to share links to these previous reports?

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 10:28  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** RE: FW: Clyde cod spawning consultation

Dear [Name redacted]

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 14 October 2021 18:37  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: FW: Clyde cod spawning consultation

Hello [Name redacted]

Just a quick follow up.

We note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of*

*spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

We have requested the document from the Clyde Fishermen’s Association today, but one of their representatives has said it is unavailable at this time. You and Marine Scotland colleagues were cc’d into this correspondence.

However, this would seem to contradict the guidance in the Government’s consultation document which indicates that the report would be made accessible to stakeholders on request.

Noting our concern that a public consultation is potentially being influenced by the inclusion of the government’s stated views (para 12) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders, are you able to share the report?

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 12 October 2021 21:06  
**To:** [Names redacted]  
**Subject:** Re: FW: Clyde cod spawning consultation

Dear [Name redacted]

Many thanks for the opportunity to feed into this consultation, please find a consultation response from Open Seas attached.

Please let me know if anything is unclear or you would like any further information on any of the points raised.

With best wishes,

[Name redacted]

Dear All,

Please find attached a consultation letter seeking views on the continuation of the seasonal closure (14 February – 30 April) in the Firth of Clyde to protect spawning cod during 2022 and 2023.

If you have any comments, please forward them to me by **Wednesday 13 October 2021** using the respondent information form found within the letter.

Please feel free to share this letter with any other parties who may hold an interest.

Kind regards,

[Name redacted]

[Name redacted]

**[Position redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]

**From: [Name Redacted]**

**Sent:** 14 October 2021 18:37

**To: [Name Redacted]**

**Cc: [Name Redacted]**

**Subject:** RE: FW: Clyde cod spawning consultation

Hello **[Name Redacted]**,

Just a quick follow up.

We note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

We have requested the document from the Clyde Fishermen's Association today, but one of their representatives has said it is unavailable at this time. You and Marine Scotland colleagues were cc'd into this correspondence.

However, this would seem to contradict the guidance in the Government's consultation document which indicates that the report would be made accessible to stakeholders on request.

Noting our concern that a public consultation is potentially being influenced by the inclusion of the government's stated views (para 12) based on the early results of a report that is

currently unpublished and inaccessible to other stakeholders, are you able to share the report?

Kind regards,

**[Name Redacted]**

**From: [Name Redacted]**

**Sent:** 12 October 2021 21:06

**To: [Names Redacted]**

**Subject:** Re: FW: Clyde cod spawning consultation

Dear **[Name Redacted]**,

Many thanks for the opportunity to feed into this consultation, please find a consultation response from Open Seas attached.

Please let me know if anything is unclear or you would like any further information on any of the points raised.

With best wishes,

**[Name Redacted]**

Dear All,

Please find attached a consultation letter seeking views on the continuation of the seasonal closure (14 February – 30 April) in the Firth of Clyde to protect spawning cod during 2022 and 2023.

If you have any comments, please forward them to me by **Wednesday 13 October 2021** using the respondent information form found within the letter.

Please feel free to share this letter with any other parties who may hold an interest.

Kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted] Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]

**From:** [Name redacted]  
**Sent:** 15 October 2021 07:26  
**To:** [Name redacted]  
**Subject:** FW: FW: Clyde cod spawning consultation

What a can of worms! Any thoughts on this please?

Ta,  
[Name redacted]

**From:** [Name redacted]  
**Sent:** 14 October 2021 18:37  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: FW: Clyde cod spawning consultation

Hello [Name redacted]

Just a quick follow up.

We note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

We have requested the document from the Clyde Fishermen's Association today, but one of their representatives has said it is unavailable at this time. You and Marine Scotland colleagues were cc'd into this correspondence.

However, this would seem to contradict the guidance in the Government's consultation document which indicates that the report would be made accessible to stakeholders on request.

Noting our concern that a public consultation is potentially being influenced by the inclusion of the government's stated views (para 12) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders, are you able to share the report?

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 12 October 2021 21:06

**To:** [Names redacted]

**Subject:** Re: FW: Clyde cod spawning consultation

Dear [Name redacted]

Many thanks for the opportunity to feed into this consultation, please find a consultation response from Open Seas attached.

Please let me know if anything is unclear or you would like any further information on any of the points raised.

With best wishes,

[Name redacted]

Dear All,

Please find attached a consultation letter seeking views on the continuation of the seasonal closure (14 February – 30 April) in the Firth of Clyde to protect spawning cod during 2022 and 2023.

If you have any comments, please forward them to me by **Wednesday 13 October 2021** using the respondent information form found within the letter.

Please feel free to share this letter with any other parties who may hold an interest.

Kind regards,

[Name redacted]

[Name redacted]

[Position redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 17:00  
**To:** [Names redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name redacted]

I've asked around here – we think this refers to the St Andrews Uni Clyde cod surveys, and we don't recall an MS (or MSS) report on them. The survey was led by [Name redacted] so he might be able to help.

Cheers - [Name redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 16:14  
**To:** [Names redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Thanks [Name redacted]

I don't have the reports.

Can those of the copy list do a wee trawl. Would be good to try and put this to bed.

Thanks

[Name redacted]

[Name redacted]

[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 08:34  
**To:** [Names redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name redacted]

[Name redacted] spoke to [Name redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name redacted] couldn't provide the older published versions.

Thanks

[Name redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 17:39  
**To:** [Names redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name redacted].

Just wondering if anyone is picking this up, in touch with [Name redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name redacted]

[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name redacted]

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

[Name redacted]

On Tue, 26 Oct 2021, 18:49 [Name redacted] wrote:

Hi [Name redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

[Name redacted]

**From:** [Name redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name redacted]

**Cc** [Name redacted]; [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); Copy: [Names redacted]

**Subject:** Re: Clyde Cod report

Hello [Name redacted]

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name redacted]

On Thu, 14 Oct 2021, 12:46 [Name redacted] wrote:

Hello [Name redacted]

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of*

*spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen’s Association be able to share the final version of the report?

Regards,

[Name redacted]



[Personal data redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

[Attachment included separately] - 061

**From:** [Name Redacted]  
**Sent:** 15 October 2021 13:07  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: Consultation Query

Hi [Name Redacted],

Many thanks for getting back to me so quickly. I have attached the consultation document for you to have a look at.

Many thanks

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 15 October 2021 12:05  
**To:** [Name Redacted]

**Cc: [Name Redacted]**

**Subject: RE: Consultation Query**

Hi **[Name Redacted]**,

Thank you for your enquiry. As your consultation is for web only publication, your request has been passed to me to take forward.

Please find attached a copy of our Web Publishing Form for you to complete and return to assist APS to register, estimate and schedule publication.

Please can you supply us with the draft version of your document. We would then ask our Studio to take a look at this and run an accessibility report to make sure it complies with SG accessibility guidelines.

If no formatting/design work is required we would typically ask for 7-10 working days from when you provide the final document to the date of publication. However you have mentioned that this needs to be expedited, which we can do. Please can you provide the document so I can give a better indication of the time needed.

As your consultation will be published on the SG website, you should note the following important information, particularly notes 2, 3 and 4.

#### **Advisory information**

- 1. Scottish Government Accessible Publications** – SG follow accessibility guidelines as endorsed by Scottish Accessible Information Forum (SAIF) and the Scottish Government Equality Unit and which are underpinned by legislation. To assist you to prepare your final document to conform, I have linked a copy of the [Scottish Government's Publishing Compliance Guidelines](#)
- 2. SG Digital Engagement Team.** Due to recent changes affecting website hosting on Citizen Space of SG consultation documents, your consultation must be flagged to the team as early as possible. You can do this by emailing [digitalengagement@gov.scot](mailto:digitalengagement@gov.scot)
- 3. Respondent Information Form (RIF)** – Consultations should always have an RIF. The latest version of this (word document) is attached.
- 4. Responding to this consultation** – The Scottish Government has recently approved wording regarding how to respond to consultations, which I have attached. This must be incorporated within your document.
- 5. Cover** – To comply with SG Web publishing guidelines, your report will be collated with a standard SG Web cover inclusive of Scottish Government copyright information, required ISBN and DPPAS Product Code.
- 6. Acronyms** – If your document contains acronyms, these will be identified during our web conversion quality check and you will be sent a table listing them. APS may be able to populate some or all definitions from our acronym database, however, you will need to check and complete this table and return as quickly as possible to avoid any delay in publication.

**7. SG Web Registration** – After allocation of your publication’s ISBN we will be send you a link to an SG Web Publications online form which you must complete, confirming publication date and time, to allow publication.

In the meantime, please do not hesitate to email me should you require clarification.

Kind Regards,  
**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**[Contact  
Details  
Redacted]**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**From:** **[Name Redacted]**  
**Sent:** 15 October 2021 11:29  
**To:** Scot Gov Enquiries <[ScotGovEnquiries@theapsgroup.com](mailto:ScotGovEnquiries@theapsgroup.com)>  
**Cc:** **[Name Redacted]**  
**Subject:** Consultation Query  
**Importance:** High

Good Morning,

I'm just off the phone to you and popping this in an email as advised.

I'm looking for some advice on how quickly a consultation document could be put on the website? We have run it as an informal stakeholder consultation, but we have been challenged that it should have been made publically available online, and our legal team have now recommended that we put it up online for a further 2 week period. Timings are becoming quite tight so we really need to get it online as soon as possible. I'm just wondering how quickly you would be able to turn this around?

I'd really appreciate it if someone could get back to me as soon as possible.

Many thanks,

[Name Redacted]

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]



**From:** [Name redacted]

**Sent:** 29 October 2021 15:20

**To:** [Name redacted]

**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Allan and I will be in Norway next week, what is your availability Tuesday to have a MS Teams meeting? It might need to be evening for us to schedule around other meeting. Does that work for you?

Best regards, [Name redacted]

[Name redacted]

**From:** [Name redacted]

**Sent:** 28 October 2021 10:18

**To:** [Names redacted]

**Cc:** [Name redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thanks [Name redacted], yes happy to schedule a call with Allan about this. But in the meantime may I suggest once again that we would be very grateful for a copy of the report by over the course of the next few days, in time to allow it to be considered ahead of the consultation close, and to save us all going through the FOI process.

Kind regards

[Name redacted]

[Name redacted]

[Personal data deleted]

Get [Outlook for iOS](#)

---

**From:** [Name redacted]  
**Sent:** Wednesday, October 27, 2021 12:05:41 PM  
**To:** [Names redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]  
Written concerns should be addressed to Allan Gibb ([allan.gibb@gov.scot](mailto:allan.gibb@gov.scot)), however if it would be helpful to discuss the issue first I can arrange for you to speak to [Name redacted] and Allan Gibb.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 10:34  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

[Name redacted]  
[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 10:21  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 09:59  
**To:** [Name redacted]  
**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

[Name redacted]

---

**From:** [Name redacted]  
**Sent:** 19 October 2021 13:05  
**To:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]  
[Name redacted]  
[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 13 October 2021 13:53  
**To:** [Name redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name redacted]

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name redacted]

[Name redacted]  
**[Position redacted]**  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal data redacted]



**From:** [Name redacted]  
**Sent:** 13 October 2021 13:49  
**To:** [Name redacted]  
**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name redacted]

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name redacted]  
[Name redacted]  
**[Personal data redacted]**  
**From:** [Name Redacted]  
**Sent:** 29 October 2021 09:41

**To:** [Names Redacted]  
**Cc:** [Names Redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Thanks [Name Redacted],

This is helpful – I'll try contacting [Name Redacted].

Cheers,

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 17:00  
**To:** [Names Redacted]  
**Cc:** [Names Redacted], Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted],

I've asked around here – we think this refers to the St Andrews Uni Clyde cod surveys, and we don't recall an MS (or MSS) report on them. The survey was led by [Name Redacted] so he might be able to help.

Cheers - [Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 16:14  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Thanks [Name Redacted],

I don't have the reports.

Can those of the copy list do a wee trawl. Would be good to try and put this to bed.

Thanks

[Name Redacted]

[Name Redacted]  
[marine.scotland](https://www.marine.scotland)  
[Position Redacted], Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Contact Details Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 08:34

**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted],

[Name Redacted] spoke to [Name Redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name Redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name Redacted] couldn't provide the older published versions.

Thanks

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 27 October 2021 17:39  
**To:** [Name Redacted]  
**Cc:** [Name Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name Redacted].

Just wondering if anyone is picking this up, in touch with [Name Redacted], or been engaging with OpenSeas re follow up work / publication of the research?

[Name Redacted]

[Name Redacted]  
[marine scotland](#)  
[Position Redacted], Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Contact Details Redacted]

**From:** [Name Redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name Redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe **[Name Redacted]** had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

**[Name Redacted]**

On Tue, 26 Oct 2021, 18:49 **[Name Redacted]** > wrote:

Hi **[Name Redacted]**

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name Redacted]

**Cc:** [Name Redacted] [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names Redacted]

**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 [Name Redacted] > wrote:

Hello [Name Redacted],

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name Redacted]



[Contact Details Redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name redacted]

**Sent:** 01 November 2021 10:59

**To:** [Name redacted]

**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; [Names redacted]

**Subject:** Re: Clyde Cod Surveys

Hello All,

For clarity, what previously happened was [Names redacted] came on trials and wrote up findings. There would then be a meeting called where Marine Scotland would look over the results with CFA and St Andrews Scientists, any points would be picked up on the report or it was simply agreed, then a forward rough plan would be made and agreed for the next surveys. This would also be the point that any reports were published on the Marine Scotland website.

About 3 years ago there was an issue with funding and resourcing, not from the CFA side as we were keen to keep the work going and support it, but it was a lack of resource I believe at MS Labs and

related to funding cycles. It was expected at the time to be a short term issue, and although no firm commitments were given there was good will to keep the work going if possible. It was noted at the time missing a year wouldn't impact the data too much in any case.

Of course this was followed by Covid, and Brexit issues. This has resulted in the normal meeting we would have had after the last trials not happening, although we have requested this a number of times we do appreciate Marine Scotland resources and time were limited to take a meeting forward. We do hope we can have one shortly to go over the last reports. Usually after the meeting the reports would be available online through the Marine Scotland website.

In addition there has been a collection of otoliths which have been maintained from the trials but not aged etc. That might be a piece of work we want to collectively consider going forward.

So really from our perspective we have passed the report from St Andrews on to Marine Scotland, and we would hope at some point soon to have a meeting to go over the report and consider any future work if possible. We would be happy for a date to be set and we can work around everyone's best availability.

We wouldn't have passed the report out until we had the trials wash up meeting collaboratively, and as previously we would expect it would then be available on the MS website.

Many thanks,

[Name redacted]

On Mon, 1 Nov 2021, 10:41 [Name redacted]wrote:

Hello [Name redacted]

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling

strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name redacted]

[Name redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name redacted], I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name redacted]

[Name redacted]

**[Position redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 10:16  
**To:** [Name redacted]  
**Subject:** RE: Clyde Cod - response to report complaints

Thanks!

**From:** [Name redacted]  
**Sent:** 27 October 2021 10:15  
**To:** [Names redacted]  
**Subject:** RE: Clyde Cod - response to report complaints

Your response is fine

**From:** [Name redacted]  
**Sent:** 22 October 2021 14:04  
**To:** [Names redacted]  
**Subject:** Clyde Cod - response to report complaints

Hi [Name redacted]

The two requests for the report are below in blue. Please see my suggested response in red.

## **SIFT**

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]

----

## **Open Seas**

Hello [Name redacted]

Just a quick follow up.

We note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version*

*of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

We have requested the document from the Clyde Fishermen’s Association today, but one of their representatives has said it is unavailable at this time. You and Marine Scotland colleagues were cc’d into this correspondence.

However, this would seem to contradict the guidance in the Government’s consultation document which indicates that the report would be made accessible to stakeholders on request.

Noting our concern that a public consultation is potentially being influenced by the inclusion of the government’s stated views (para 12) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders, are you able to share the report?

Kind regards,

[Name redacted]

---

Dear XXX

Thank you for your email regarding Clyde cod and the CFA survey results. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn’t yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn’t be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven’t already received it from the CFA.

Kind regards,

[Name redacted]

[Name redacted]

[Position redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]



**From:** [Name Redacted]

**Sent:** 02 November 2021 11:10

**To:** [Name Redacted]

**Cc:** [Names Redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name Redacted],

Apologies for the slow response. Let's wait until you are both back at your desks and you could perhaps suggest some potential meeting dates for us to consider?

In the meantime, please consider the below a request under the Freedom of Information Scotland Act 2002, including the Environmental Information (Scotland) Regulations 2004:

1. Please provide a copy of the study undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association referenced at paragraph 11 of the current Clyde Cod Spawning Closure Consultation ( available <https://www.gov.scot/publications/clyde-cod-spawning-closure-2022-23-consultation/documents/> );
2. All correspondence within Marine Scotland and between Marine Scotland and external parties with reference to this study, since 1<sup>st</sup> January 2019.

I would be grateful of an acknowledgement that this FOI has been lodged.

Kind regards

[Name Redacted]

[Name Redacted]

[Position Redacted]

SIFT

[Contact Details Redacted]

*Normal working hours, Mon-Fri 9am-3pm*

**From:** [Name Redacted]

**Sent:** 29 October 2021 15:20

**To:** [Name Redacted]

**Cc:** [Names Redacted] [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name Redacted],

Allan and I will be in Norway next week, what is your availability Tuesday to have a MS Teams meeting? It might need to be evening for us to schedule around other meeting. Does that work for you?

Best regards, [Name Redacted].

[Name Redacted], [Position Redacted], Sea Fisheries Division, Marine Scotland, Scottish Government - pronouns she/her - working from so call or email: [Contact Details Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 10:18  
**To:** [Names Redacted]  
**Cc:** [Name Redacted]  
**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thanks [Name Redacted], yes happy to schedule a call with Allan about this. But in the meantime may I suggest once again that we would be very grateful for a copy of the report by over the course of the next few days, in time to allow it to be considered ahead of the consultation close, and to save us all going through the FOI process.

Kind regards

[Name Redacted]

[Name Redacted]  
[Position Redacted]  
SIFT  
[Contact Details Redacted]  
*Normal working hours, Mon-Fri 9am-3pm*

Get [Outlook for iOS](#)

---

**From:** [Name Redacted]  
**Sent:** Wednesday, October 27, 2021 12:05:41 PM  
**To:** [Names Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Written concerns should be addressed to Allan Gibb ([allan.gibb@gov.scot](mailto:allan.gibb@gov.scot)), however if it would be helpful to discuss the issue first I can arrange for you to speak to [Name Redacted] and Allan Gibb.

Kind regards,

[Name Redacted]  
**From:** [Name Redacted]  
**Sent:** 27 October 2021 10:34  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

**SIFT**

**[Contact Details Redacted]**

**Normal working hours, Mon-Fri 9am-3pm**

**From: [Name Redacted]**

**Sent: 27 October 2021 10:21**

**To: [Name Redacted]**

**Cc: [Name Redacted]**

**Subject: RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response**

Dear **[Name Redacted]**,

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 27 October 2021 09:59

**To:** [Name Redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **[Name Redacted]**,

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

**[Name Redacted]**

---

**From:** [Name Redacted]

**Sent:** 19 October 2021 13:05

**To:** [Name Redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you Roseanne, I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

**SIFT**

**[Contact Details Redacted]**

*Normal working hours, Mon-Fri 9am-3pm*

**From:** [Name Redacted]

**Sent:** 13 October 2021 13:53

**To:** [Name Redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi **[Name Redacted]**,

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**[Contact Details Redacted]**



**From:** **[Name Redacted]**

**Sent:** 13 October 2021 13:49

**To:** **[Name Redacted]**

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **[Name Redacted]**,

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

**SIFT**

**[Contact Details Redacted]**

***Normal working hours, Mon-Fri 9am-3pm***

**From:** **[Name redacted]**

**Sent:** 22 October 2021 14:04

**To:** **[Names redacted]**

**Subject:** Clyde Cod - response to report complaints

Hi **[Name redacted]**

The two requests for the report are below in blue. Please see my suggested response in red.

**SIFT**

Thank you **[Name redacted]**, I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]

----

## Open Seas

Hello [Name redacted]

Just a quick follow up.

We note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen’s Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

We have requested the document from the Clyde Fishermen's Association today, but one of their representatives has said it is unavailable at this time. You and Marine Scotland colleagues were cc'd into this correspondence.

However, this would seem to contradict the guidance in the Government's consultation document which indicates that the report would be made accessible to stakeholders on request.

Noting our concern that a public consultation is potentially being influenced by the inclusion of the government's stated views (para 12) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders, are you able to share the report?

Kind regards,

[Name redacted]

---

Dear XXX

Thank you for your email regarding Clyde cod and the CFA survey results. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

[Name redacted]

**[Position redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]



**From: [Name Redacted]**

**Sent:** 19 October 2021 09:33

**To: [Names Redacted]**

**Cc: [Names Redacted]**

**Subject:** FW: Clyde Cod report

FYI – sorry should have copied you in...

**From: [Names Redacted]**

**Sent:** 19 October 2021 09:16

**To: [Names Redacted]**

**Cc: [Names Redacted]>**

**Subject:** FW: Clyde Cod report

FYI...Below is an extract of a WhatsApp message from **[Name Redacted]** last night on the back of the exchange below.

Just for awareness...

**[Name Redacted]**

Hello **[Name Redacted]**, I hope you are well? Just a very quick one. Re the Open Seas request for the science report, I wasn't in anyway passing the buck to MS. I just didn't want to pass out anything we hadn't had a meeting on yet or discussed in anyway as we normally would. Especially given the grilling I expect Open Seas will give it I thought it best we all consider it with the scientists first etc. Although I completely accept Brexit and Covid have slowed everything for quite some time.

**[Name Redacted]**

[marine scotland](#)

**[Position Redacted]**, Sea Fisheries Division

Scottish Government

Area 1 B South, Victoria Quay,

EDINBURGH, EH66QQ

**[Contact Details Redacted]**

**From:** [Name Redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name Redacted]

**Cc:** [Name Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; [Names Redacted]

**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name Redacted]

On Thu, 14 Oct 2021, 12:46 [Name Redacted]> wrote:

Hello [Name Redacted],

I hope this finds you well.

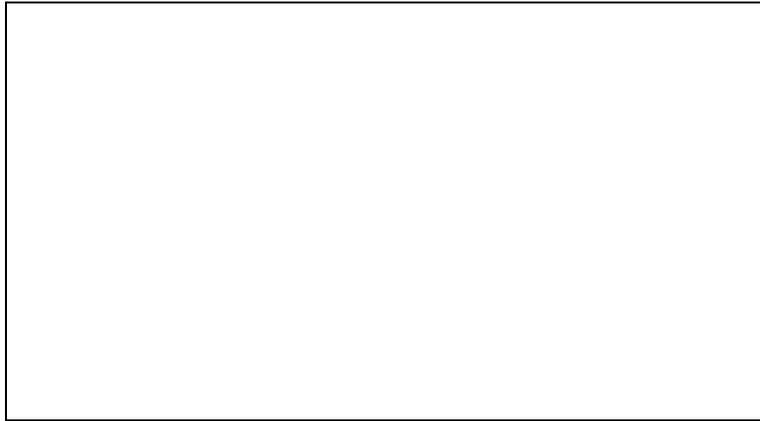
We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name Redacted]



[Contact Details Redacted]

[Attachment presented separately] - 017

**From:** [Name redacted]  
**Sent:** 15 September 2021 08:48  
**To:** [Name redacted]  
**Subject:** Clyde cod spawning consultation

Dear All,

Please find attached a consultation letter seeking views on the continuation of the seasonal closure (14 February – 30 April) in the Firth of Clyde to protect spawning cod during 2022 and 2023.

If you have any comments, please forward them to me by **Wednesday 13 October 2021** using the respondent information form found within the letter.

Please feel free to share this letter with any other parties who may hold an interest.

Kind regards,

[Name redacted]  
[Name redacted]  
**[Position redacted]**  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal data redacted]

[Attachment Removed]

**From:** [Name Redacted]  
**Sent:** 28 July 2021 17:55  
**To:** [Names Redacted]  
**Subject:** Fwd: survey

Hello [Names Redacted],

Please find attached the write up from the survey as requested. Feel free to get in touch with any questions.

Many thanks,

**[Name Redacted]**

**From: [Name Redacted]**

**Sent:** 19 October 2021 13:21

**To: [Name Redacted]**

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Another request for the CFA report...

**From: [Name Redacted]**

**Sent:** 19 October 2021 13:05

**To: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you **[Name Redacted]**, I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

**SIFT**

**[Contact Details Redacted]**

*Normal working hours, Mon-Fri 9am-3pm*

**From: [Name Redacted]**

**Sent:** 13 October 2021 13:53

**To: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi **[Name Redacted]**,

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**[Contact Details Redacted]**



**From:** [Name Redacted]

**Sent:** 13 October 2021 13:49

**To:** [Name Redacted]

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted]

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted]

SIFT

[Contact Details Redacted]

*Normal working hours, Mon-Fri 9am-3pm*

**From:** [Name Redacted]

**Sent:** 27 October 2021 09:59

**To:** [Name Redacted]

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

[Name Redacted]

---

**From:** [Name Redacted]

**Sent:** 19 October 2021 13:05

**To:** [Name Redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name Redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name Redacted]

[Name Redacted]

[Position Redacted]

SIFT

[Contact Details Redacted]

*Normal working hours, Mon-Fri 9am-3pm*

**From:** [Name Redacted]

**Sent:** 13 October 2021 13:53

**To:** [Name Redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name Redacted],

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

**From:** [Name Redacted]

**Sent:** 13 October 2021 13:49

**To:** [Name Redacted]

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted]

**SIFT**

**[Contact Details Redacted]**

**Normal working hours, Mon-Fri 9am-3pm**

**From:** [Name Redacted]

**Sent:** 19 October 2021 13:05

**To:** [Name Redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you [Name Redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name Redacted]

[Name Redacted]

[Position Redacted]

**SIFT**

**[Contact Details Redacted]**

**Normal working hours, Mon-Fri 9am-3pm**

**From:** [Name Redacted]

**Sent:** 13 October 2021 13:53

**To:** [Name Redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name Redacted],

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

**From:** [Name Redacted]  
**Sent:** 13 October 2021 13:49  
**To:** [Name Redacted]  
**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name Redacted]

[Name Redacted]  
[Position Redacted]

**SIFT**

[Contact Details Redacted]

**Normal working hours, Mon-Fri 9am-3pm**

**From:** [Name Redacted]

**Sent:** 27 October 2021 11:34

**To:** [Name Redacted]

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name Redacted]

Please see below.

Thanks

[Name Redacted]

**From:** [Name Redacted]

**Sent:** 27 October 2021 10:34

**To:** [Name Redacted]

**Cc:** [Name Redacted]

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would

suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

**SIFT**

**[Contact Details Redacted]**

***Normal working hours, Mon-Fri 9am-3pm***

**From: [Name Redacted]**

**Sent:** 27 October 2021 10:21

**To: [Name Redacted]**

**Cc: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **[Name Redacted]**,

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

**[Name Redacted]**

**From: [Name Redacted]**

**Sent:** 27 October 2021 09:59

**To: [Name Redacted]**

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **[Name Redacted]**,

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can

help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

**[Name Redacted]**

---

**From: [Name Redacted]**

**Sent:** 19 October 2021 13:05

**To: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you **[Name Redacted]**, I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

**SIFT**

**[Contact Details Redacted]**

*Normal working hours, Mon-Fri 9am-3pm*

**From: [Name Redacted]**

**Sent:** 13 October 2021 13:53

**To: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi **[Name Redacted]**,

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**[Contact Details Redacted]**

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

**From:** [Name Redacted]

**Sent:** 13 October 2021 13:49

**To:** [Name Redacted]

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted]

SIFT

[Contact Details Redacted] *Normal working hours, Mon-Fri 9am-3pm*

**From:** [Name Redacted]

**Sent:** 01 November 2021 18:25

**To:** [Name Redacted]

**Cc:** [Names Redacted]

**Subject:** RE: Clyde Cod Surveys

Hi [Name Redacted],

Thanks very much for getting back to me and for clarifying your role in the work. It sounds like there have been a few crossed wires but your email is very helpful in trying to untangle them!

I also attach a link below for the Clyde cod spawning closure consultation. Please note that this is due to close on Thursday.

[Clyde cod spawning closure consultation](#)

Kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

**From:** [Name Redacted]  
**Sent:** 01 November 2021 10:41  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: Clyde Cod Surveys

Hello [Name Redacted],

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name Redacted],

[Name Redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name Redacted], I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name Redacted]

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]



[Attachment presented separately] 073

**From:** [Name redacted]

**Sent:** 18 October 2021 16:47

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** PDF VERSION - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi [Name redacted],

I have attached the PDF version for your approval. In order to meet Wednesdays publication date we would ideally be looking sign-off on this version by 10am tomorrow if possible.

Thanks,

[Name redacted]

[Name redacted]

[Position redacted]

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

[Contact

Details

redacted]

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



MAKING MORE POSSIBLE FOR  
OUR CLIENTS FOR OVER 60 YEARS

FIND OUT MORE

**From:** [Name redacted]

**Sent:** 18 October 2021 09:17

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** ACCESSIBILITY REPORT - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi [Name redacted],

Our Content Quality & Accessibility Analysts have carried out an accessibility check on your document and have some comments, detailed in the attached report.

Please can you incorporate these changes into the document, in order to ensure that it complies with SG accessibility guidelines.

Once you get the revised document back to me, I will put this into our Studio for a PDF version as soon as possible.

Thanks,

[Name redacted]

[Name redacted]

[Position redacted]

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

[Contact Details  
redacted]

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



MAKING MORE POSSIBLE FOR  
OUR CLIENTS FOR OVER 60 YEARS

FIND OUT MORE

**From:** [Name redacted]

**Sent:** 18 October 2021 08:52

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** COST ESTIMATE - SCT1021567142 - Clyde Cod Spawning Closure 2022-23

Hi [Name redacted],

I have attached an estimate for the web conversion of your forthcoming document and to assist you to raise a **purchase order number**. Please note this estimate is subject to change depending on the amount of work required.

Our estimate is based on PDF and HTML conversion of your supplied word document inclusive of brand check, addition of ISBN, and product code to conform with SG website guidelines. I have passed your document to our Content Quality & Accessibility Analysts for an accessibility check and will get any comments back to you as soon as possible.

Thanks,  
**[Name redacted]**

**[Name redacted]**  
**[Position redacted]**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**[Contact  
Details  
redacted]**

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**From:** **[Name redacted]**  
**Sent:** 18 October 2021 08:08  
**To:** **[Name redacted]**  
**Cc:** **[Name redacted]**  
**Subject:** RE: Consultation Query

Good Morning **[Name redacted]**,

Please find attached an updated version of the consultation document and the publishing form.

Kind regards,

**[Name redacted]**

**From:** **[Name redacted]**  
**Sent:** 15 October 2021 16:47  
**To:** **[Name redacted]**  
**Cc:** **[Name redacted]**  
**Subject:** RE: Consultation Query

Hi [Name redacted],

No problem, when you get the Publishing Form and final document over to me, I will put this in for an accessibility check ASAP on Monday.

Enjoy your weekend when it comes!

Thanks,

[Name redacted]

[Name redacted]

[Position redacted]

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

[Contact Details  
redacted]

[www.theapsgroup.com](http://www.theapsgroup.com)

Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)



**From:** [Name redacted]**Sent:** 15 October 2021 16:40

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Consultation Query

Hi [Name redacted],

Thanks for getting back to me. Apologies for the delay in getting back to you. I have been working on updating the consultation document and completing the publishing form, but am still waiting for clearance to send them back to you. We'll get them to you as soon as possible!

Kind regards,

[Name redacted]

**From:** [Name redacted]

**Sent:** 15 October 2021 13:32

**To:** [Name redacted]

**Cc:** [Name redacted]

**Subject:** RE: Consultation Query

Hi **[Name redacted]**,

Thanks for getting this over to me. There are some accessibility issues within the publication, so I will pass your document to our Content Quality & Accessibility Analysts for an accessibility check and will get any comments back to you as soon as possible. In order to do this, please can you complete the Publishing Form attached and return as soon as possible. This will also allow me to provide you with an estimate.

In terms of timescales, this will largely depend on when you are able to sign-off on the PDF with no further changes.

I should be able to get the accessibility comments back to you by COP today. If you could make these amends and get the document back to me early on Monday we will be able to get a PDF version back to you by COP Monday.

Once you confirm that you are happy to proceed, I will get an SG Web Registration Form over to you to complete which is required to schedule publication. We typically request sign-off with no further changes by 10am the day prior to publication. The PDF can then publish with the HTML to follow as soon as possible – does this approach suit?

I note that the document doesn't contain the 'Responding to this consultation' text. Please can you insert that into this document. The [URL] in this can be obtained from the Digital Engagement Team ([digitalengagement@gov.scot](mailto:digitalengagement@gov.scot)), who you will need to flag this consultation with, if you have not done so already.

We would encourage that some text is added to the document just flagging that whilst previously the closing date was the 13<sup>th</sup>, this has now been extended to the new closing date.

Thanks,  
**[Name redacted]**

**[Name redacted]**  
**[Position redacted]**

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

**[Contact  
Details  
redacted]**

[www.theapsgroup.com](http://www.theapsgroup.com)  
Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)





MAKING MORE POSSIBLE FOR  
OUR CLIENTS FOR OVER 60 YEARS

[FIND OUT MORE](#)

**From:** [Name redacted]  
**Sent:** 15 October 2021 13:07  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Consultation Query

Hi [Name redacted]

Many thanks for getting back to me so quickly. I have attached the consultation document for you to have a look at.

Many thanks

[Name redacted]

**From:** [Name redacted]  
**Sent:** 15 October 2021 12:05  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** RE: Consultation Query

Hi [Name redacted],

Thank you for your enquiry. As your consultation is for web only publication, your request has been passed to me to take forward.

Please find attached a copy of our Web Publishing Form for you to complete and return to assist APS to register, estimate and schedule publication.

Please can you supply us with the draft version of your document. We would then ask our Studio to take a look at this and run an accessibility report to make sure it complies with SG accessibility guidelines.

If no formatting/design work is required we would typically ask for 7-10 working days from when you provide the final document to the date of publication. However you have mentioned that this needs to be expedited, which we can do. Please can you provide the document so I can give a better indication of the time needed.

As your consultation will be published on the SG website, you should note the following important information, particularly notes 2, 3 and 4.

**Advisory information**

- 1. Scottish Government Accessible Publications** – SG follow accessibility guidelines as endorsed by Scottish Accessible Information Forum (SAIF) and the Scottish Government Equality Unit and which are underpinned by legislation. To assist you to prepare your final document to conform, I have linked a copy of the [Scottish Government’s Publishing Compliance Guidelines](#)
- 2. SG Digital Engagement Team.** Due to recent changes affecting website hosting on Citizen Space of SG consultation documents, your consultation must be flagged to the team as early as possible. You can do this by emailing [digitalengagement@gov.scot](mailto:digitalengagement@gov.scot)
- 3. Respondent Information Form (RIF)** – Consultations should always have an RIF. The latest version of this (word document) is attached.
- 4. Responding to this consultation** – The Scottish Government has recently approved wording regarding how to respond to consultations, which I have attached. This must be incorporated within your document.
- 5. Cover** – To comply with SG Web publishing guidelines, your report will be collated with a standard SG Web cover inclusive of Scottish Government copyright information, required ISBN and DPPAS Product Code.
- 6. Acronyms** – If your document contains acronyms, these will be identified during our web conversion quality check and you will be sent a table listing them. APS may be able to populate some or all definitions from our acronym database, however, you will need to check and complete this table and return as quickly as possible to avoid any delay in publication.
- 7. SG Web Registration** – After allocation of your publication’s ISBN we will be send you a link to an SG Web Publications online form which you must complete, confirming publication date and time, to allow publication.

In the meantime, please do not hesitate to email me should you require clarification.

Kind Regards,  
[Name redacted]

[Name redacted]  
[Position redacted]

APS Group  
21 Tennant Street  
Edinburgh  
EH6 5NA

[Contact  
Details  
redacted]

[www.theapsgroup.com](http://www.theapsgroup.com)  
Follow us on: [Twitter](#) | [Instagram](#) | [LinkedIn](#)





MAKING MORE POSSIBLE FOR  
OUR CLIENTS FOR OVER 60 YEARS

FIND OUT MORE

**From:** [Name redacted]  
**Sent:** 15 October 2021 11:29  
**To:** Scot Gov Enquiries <[ScotGovEnquiries@theapsgroup.com](mailto:ScotGovEnquiries@theapsgroup.com)>  
**Cc:** [Name redacted]  
**Subject:** Consultation Query  
**Importance:** High

Good Morning,

I'm just off the phone to you and popping this in an email as advised.

I'm looking for some advice on how quickly a consultation document could be put on the website? We have run it as an informal stakeholder consultation, but we have been challenged that it should have been made publically available online, and our legal team have now recommended that we put it up online for a further 2 week period. Timings are becoming quite tight so we really need to get it online as soon as possible. I'm just wondering how quickly you would be able to turn this around?

I'd really appreciate it if someone could get back to me as soon as possible.

Many thanks,

[Name redacted]

[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Contact Details redacted]

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

**From:** [Name Redacted]  
**Sent:** 14 October 2021 12:53  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; [Names Redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 **[Name Redacted]**> wrote:

Hello **[Name Redacted]**,

I hope this finds you well.

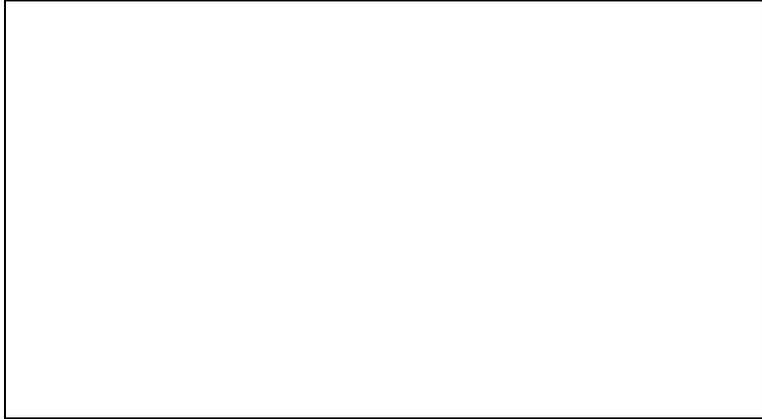
We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

**[Name Redacted]**



**[Contact Details Redacted]**

**From:** [Name Redacted]  
**Sent:** 27 October 2021 11:43  
**To:** [Name Redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Reply that any concerns should be addressed to Allan but if she wants to discuss in the meantime she can ring me.

**From:** [Name Redacted]  
**Sent:** 27 October 2021 11:34  
**To:** [Name Redacted]  
**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi [Name Redacted],

Please see below.

Thanks  
[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 27 October 2021 10:34  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Thank you for your response, however I'm afraid I find it rather curious that it isn't available- or indeed apparently agreed- and yet within the body of the consultation document you quote 'preliminary results' as follows..

*More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.*

This quote could significantly influence consultee perceptions on the effectiveness of the proposed closure. If the work isn't signed off then this statement is illegitimate and consequently, I would suggest that the consultation process is fundamentally flawed and should be repeated without reference to that study.

Please let me know to whom I should address these concerns and indeed to whom I should address an FOI on this matter.

Kind regards

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted] SIFT**

**[Contact Details Redacted]**

*Normal working hours, Mon-Fri 9am-3pm*

**From: [Name Redacted]**

**Sent:** 27 October 2021 10:21

**To: [Name Redacted]**

**Cc: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **[Name Redacted]**,

Thank you for your email regarding Clyde cod and the CFA survey results and apologies for my delayed response. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

**[Name Redacted]**

**From: [Name Redacted]**

**Sent:** 27 October 2021 09:59

**To: [Name Redacted]**

**Subject:** Re: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear **[Name Redacted]**,

Can I ask again please for the CFA report mentioned in the consultation response? I have contact with stakeholders who would like to view it ahead of the closing of the consultation. I hope you can

help by return, which would preclude the need for us to progress via a freedom of information request.

Regards

**[Name Redacted]**

---

**From: [Name Redacted]**

**Sent:** 19 October 2021 13:05

**To: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Thank you **[Name Redacted]**, I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

**[Name Redacted]**

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted] SIFT**

**[Contact Details Redacted]**

*Normal working hours, Mon-Fri 9am-3pm*

**From: [Name Redacted]**

**Sent:** 13 October 2021 13:53

**To: [Name Redacted]**

**Subject:** RE: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Hi **[Name Redacted]**

Many thanks for your response to the consultation. I can confirm that we have received it.

Kind regards,

**[Name Redacted]**

**[Name Redacted]**

**[Position Redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**[Contact Details Redacted]**



**From:** [Name Redacted]

**Sent:** 13 October 2021 13:49

**To:** [Name Redacted]

**Subject:** FW: Sustainable Inshore Fisheries Trust (SIFT) Clyde Cod Consultation Response

Dear [Name Redacted],

Please find attached SIFT's response to the recent Clyde Cod Closure consultation. Please can you confirm receipt of this email, by return.

Thank you and kind regards,

[Name Redacted]

[Name Redacted]

[Position Redacted]SIFT

[Contact Details Redacted]

*Normal working hours, Mon-Fri 9am-3pm*

**From:** [Name Redacted]

**Sent:** 27 October 2021 17:39

**To:** [Names Redacted]

**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name Redacted].

Just wondering if anyone is picking this up, in touch with [Name Redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name Redacted]

[Name Redacted]

marine scotland

[Position Redacted], Sea Fisheries Division

Scottish Government

Area 1 B South, Victoria Quay,

EDINBURGH, EH66QQ

[Contact Details Redacted]

**From:** [Name Redacted]

**Sent:** 26 October 2021 19:06

**To: [Name Redacted]**

**Subject:** Re: Clyde Cod report

Hello **[Name Redacted]**

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe **[Name Redacted]** had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

**[Name Redacted]**

On Tue, 26 Oct 2021, 18:49 **[Name Redacted]** wrote:

Hi **[Name Redacted]**

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name Redacted]

**Cc:** [Name Redacted]; [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names Redacted]

**Subject:** Re: Clyde Cod report

Hello [Name Redacted]

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 [Name Redacted] > wrote:

Hello [Name Redacted],

I hope this finds you well.

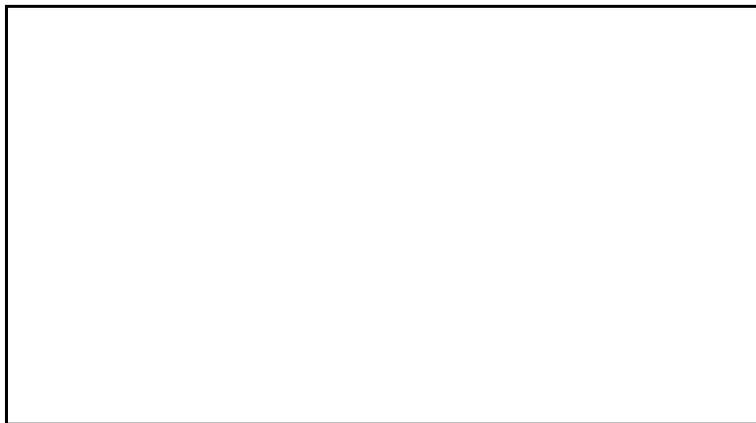
We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name Redacted]



[Contact Details Redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name redacted]

[Name redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name redacted] I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name redacted]

[Name redacted]

[Position redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]



**From:** [Name redacted]

**Sent:** 26 October 2021 19:06

**To:** [Name redacted]

**Subject:** Re: Clyde Cod report

Hello [Name redacted]

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

[Name redacted]

On Tue, 26 Oct 2021, 18:49 [Name redacted] wrote:

Hi [Name redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

[Name redacted]

**From:** [Name redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name redacted]

**Cc:** [Name redacted]; [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); Copy: [Names redacted] **Subject:** Re: Clyde Cod report

Hello [Name redacted]

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name redacted]

On Thu, 14 Oct 2021, 12:46 [Name redacted] wrote:

Hello [Name redacted]

I hope this finds you well.

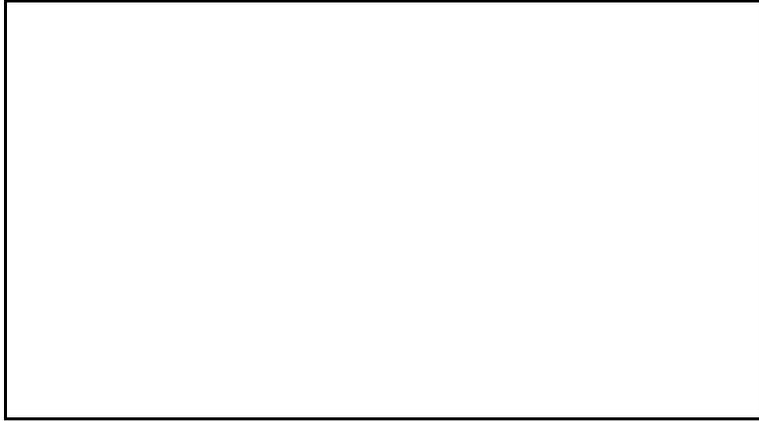
We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name redacted]



[Personal data redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name Redacted]  
**Sent:** 28 October 2021 08:34  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted],

[Name Redacted] spoke to [Name Redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name Redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name Redacted] couldn't provide the older published versions.

Thanks

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 27 October 2021 17:39  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name Redacted].

Just wondering if anyone is picking this up, in touch with [Name Redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name Redacted]

**[Name Redacted]**

marine scotland

**[Position Redacted]**, Sea Fisheries Division

Scottish Government

Area 1 B South, Victoria Quay,

EDINBURGH, EH66QQ

**[Contact Details Redacted]**

**From:** **[Name Redacted]**

**Sent:** 26 October 2021 19:06

**To:** **[Name Redacted]**

**Subject:** Re: Clyde Cod report

Hello **[Name Redacted]**

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe **[Name Redacted]** had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

**[Name Redacted]**

On Tue, 26 Oct 2021, 18:49 **[Name Redacted]** wrote:

Hi **[Name Redacted]**

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name Redacted]

**Cc:** [Name Redacted] [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names Redacted]

**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 **[Name Redacted]** > wrote:

Hello **[Name Redacted]**,

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

**[Name Redacted]**



**[Contact Details Redacted]**

**From:** [Name redacted]  
**Sent:** 25 September 2019 11:17  
**To:** [Names redacted]  
**Subject:** Re: FW: IFMAC - Clyde Cod Spawning Closure SSI 2020/21

Hello [Name redacted]

We just received the draft report a couple of weeks ago. The supervisor involved unfortunately was ill.

We need to have a meeting with Marine Scotland and the academics to review the information then the work will be made public.

Thanks,

[Name redacted]

On Wed, Sep 18, 2019 at 10:04 AM [Name redacted] > wrote:

Dear [Name redacted]

Can I request a copy of the draft report as discussed below? It would be very much appreciated, thanks in anticipation.

Regards

[Name redacted]

**From:** [Name redacted]  
**Sent:** 17 September 2019 13:54  
**To:** [Name redacted]  
**Subject:** RE: IFMAC - Clyde Cod Spawning Closure SSI 2020/21

Dear [Name redacted]

Thank you for your email. The draft report is available on request from the Clyde Fishermen's Association.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 13 September 2019 12:18  
**To:** [Name redacted]  
**Subject:** RE: IFMAC - Clyde Cod Spawning Closure SSI 2020/21

Dear [Name redacted]

Thank you for sending us this consultation. Can I ask, with regard to para 11 of the document, why the Oceans Institute report (which seems to me to form a very important part of the research needed to make an informed response) isn't being made available? I appreciate it is draft form but is there any way the researchers could provide an executive summary or something similar?

Thank you

[Name redacted]

***\*Please note: new working hours 9am to 3pm, Monday to Friday\****

[Name redacted]

***[Position redacted]***

***[Personal data redacted]***

**From:** [Name redacted]  
**Sent:** 30 August 2019 13:56  
**Subject:** IFMAC - Clyde Cod Spawning Closure SSI 2020/21

Dear All,

Please find attached a letter seeking views on the continuation of the seasonal closure (14<sup>th</sup> February to 30<sup>th</sup> April) in the Firth of Clyde to protect spawning cod for the period 2020/21.

If you have any comments please forward them to me by the **20<sup>th</sup> September 2019** using the respondent information form found in Annex C of the letter.

Please feel free to pass this letter on to any other interested parties.

Kind regards

[Name redacted]

[Name redacted]

**[Position redacted]**

Marine Scotland - Sea Fisheries

Area 1B-South, Victoria Quay, Edinburgh, EH6 6QQ

[Personal data redacted]



**From:** [Name Redacted]  
**Sent:** 28 October 2021 19:46  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: Clyde Cod report

Please do and I am going to reply to **[Name Redacted]** about a call to set up for next week.

**From:** **[Name Redacted]**  
**Sent:** 28 October 2021 17:47  
**To:** **[Name Redacted]**  
**Cc:** **[Name Redacted]**  
**Subject:** FW: Clyde Cod report

Hi **[Name Redacted]**,

Sorry, I know Clyde cod will be the last thing on your mind at the end of a long day of trilateral...

This all seems very odd but just following on from **[Name Redacted]** email – I don't know why **[Name Redacted]** doesn't have copies, why she hasn't produced them for us when asked in the past or why she hasn't signposted any of us to St Andrews Uni if she doesn't hold them. All feels like a very odd goose chase.

But anyway, if you're happy I can get in touch with **[Name Redacted]** and ask for copies of any earlier reports, and pass on anything he sends to Open seas and SIFT? In hindsight wish I'd known to get in touch with him sooner...

Thanks  
**[Name Redacted]**

**From:** **[Name Redacted]**  
**Sent:** 28 October 2021 17:00  
**To:** **[Names Redacted]****Cc:** **[Names Redacted]**>; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi **[Name Redacted]**,

I've asked around here – we think this refers to the St Andrews Uni Clyde cod surveys, and we don't recall an MS (or MSS) report on them. The survey was led by **[Name Redacted]** so he might be able to help.

Cheers - **[Name Redacted]**

**From:** **[Name Redacted]**  
**Sent:** 28 October 2021 16:14  
**To:** **[Names Redacted]**  
**Cc:** **[Names Redacted]** Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Thanks **[Name Redacted]**,

I don't have the reports.

Can those of the copy list do a wee trawl. Would be good to try and put this to bed.

Thanks

**[Name Redacted]**

**[Name Redacted]**

marine scotland

**[Position Redacted]**

Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

**[Contact Details Redacted]**

**From:** **[Name Redacted]**

**Sent:** 28 October 2021 08:34

**To:** **[Names Redacted]**

**Cc:** **[Names Redacted]** Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** RE: Clyde Cod report

Hi **[Name Redacted]**,

**[Name Redacted]** spoke to **[Name Redacted]** last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what **[Name Redacted]** has said. Has anyone else seen these/have links to them? I'm not sure why **[Name Redacted]** couldn't provide the older published versions.

Thanks

**[Name Redacted]**,

**From:** **[Name Redacted]**

**Sent:** 27 October 2021 17:39

**To:** **[Names Redacted]**

**Cc:** **[Names Redacted]** Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from **[Name Redacted]**.

Just wondering if anyone is picking this up, in touch with **[Name Redacted]**, or been engaging with Openseas re follow up work / publication of the research?

**[Name Redacted]**

**[Name Redacted]**

marine scotland

**[Position Redacted]**

Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

**[Contact Details Redacted]**

**From:** [Name Redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name Redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name Redacted]

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name Redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

**[Name Redacted]**

On Tue, 26 Oct 2021, 18:49 [Name Redacted]> wrote:

Hi [Name Redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name Redacted]>

**Cc:** [\[Name Redacted\]](#); [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names Redacted]

**Subject:** Re: Clyde Cod report

Hello **[Name Redacted]**

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 **[Name Redacted]**> wrote:

Hello **[Name Redacted]**,

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

**[Name Redacted]**



**[Contact Details Redacted]**

[Attachment presented separately] 002

**From:** [Name redacted]  
**Sent:** 30 August 2019 13:04  
**To:** [Names redacted]  
**Subject:** FW: Clyde Cod Spawning Closure SSI 2020/21

Hi Both,

Could you please forward this consultation on to the IFMAC and FMAC distribution lists?

Many thanks,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 30 August 2019 12:59  
**Cc:** [Name redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; Director of Marine Scotland Mailbox <[Directormarinescotland@gov.scot](mailto:Directormarinescotland@gov.scot)>; [Names redacted]  
**Subject:** Clyde Cod Spawning Closure SSI 2020/21

Dear All,

Please find attached a letter seeking views on the continuation of the seasonal closure (14<sup>th</sup> February to 30<sup>th</sup> April) in the Firth of Clyde to protect spawning cod for the period 2020/21.

If you have any comments please forward them to me by the **20<sup>th</sup> September 2019** using the respondent information form found in Annex C of the letter.

Please feel free to pass this letter on to any other interested parties.

Kind regards

[Name redacted]  
[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-South, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal information redacted]



**From:** [Name Redacted]  
**Sent:** 19 July 2021 13:30  
**To:** [Name Redacted]

**Cc:** [Name Redacted]

**Subject:** Clyde Cod Report

Hi [Name Redacted],

I hope you are well. [Name Redacted] mentioned that she had a chat with you earlier and that she had mentioned we are looking at the Clyde Cod SSI renewal at the moment. Do you have any update on the study run by CFA and the Scottish Oceans Institute. I appreciate that there probably won't have been much done during the last year and a half, but I think I recall that you were awaiting the draft updated report last time we were consulting on this, in 2019. Could you please send this through to us, or any further updates since if you have them?

Many thanks

[Name Redacted]

[Name Redacted]

[Position Redacted] Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot

[Attachment provided separately] 005

**From:** [Name redacted]

**Sent:** 30 August 2019 12:59

**Cc:** [Name redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; Director of Marine Scotland Mailbox <[Directormarinescotland@gov.scot](mailto:Directormarinescotland@gov.scot)>; [Names redacted]

**Subject:** Clyde Cod Spawning Closure SSI 2020/21

Dear All,

Please find attached a letter seeking views on the continuation of the seasonal closure (14<sup>th</sup> February to 30<sup>th</sup> April) in the Firth of Clyde to protect spawning cod for the period 2020/21.

If you have any comments please forward them to me by the **20<sup>th</sup> September 2019** using the respondent information form found in Annex C of the letter.

Please feel free to pass this letter on to any other interested parties.

Kind regards

[Name redacted]

[Name redacted]

[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-South, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal information redacted]



**From:** [Name Redacted]  
**Sent:** 01 November 2021 10:59  
**To:** [Name Redacted]  
**Cc:** [Names Redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; [Names Redacted]  
**Subject:** Re: Clyde Cod Surveys

Hello All,

For clarity, what previously happened was [Name Redacted] and his team came on trials and wrote up findings. There would then be a meeting called where Marine Scotland would look over the results with CFA and St Andrews Scientists, any points would be picked up on the report or it was simply agreed, then a forward rough plan would be made and agreed for the next surveys. This would also be the point that any reports were published on the Marine Scotland website.

About 3 years ago there was an issue with funding and resourcing, not from the CFA side as we were keen to keep the work going and support it, but it was a lack of resource I believe at MS Labs and related to funding cycles. It was expected at the time to be a short term issue, and although no firm commitments were given there was good will to keep the work going if possible. It was noted at the time missing a year wouldn't impact the data too much in any case.

Of course this was followed by Covid, and Brexit issues. This has resulted in the normal meeting we would have had after the last trials not happening, although we have requested this a number of times we do appreciate Marine Scotland resources and time were limited to take a meeting forward. We do hope we can have one shortly to go over the last reports. Usually after the meeting the reports would be available online through the Marine Scotland website.

In addition there has been a collection of otoliths which have been maintained from the trials but not aged etc. That might be a piece of work we want to collectively consider going forward.

So really from our perspective we have passed the report from St Andrews on to Marine Scotland, and we would hope at some point soon to have a meeting to go over the report and consider any future work if possible. We would be happy for a date to be set and we can work around everyone's best availability.

We wouldn't have passed the report out until we had the trials wash up meeting collaboratively, and as previously we would expect it would then be available on the MS website.

Many thanks,

[Name Redacted]

On Mon, 1 Nov 2021, 10:41 [Name Redacted]> wrote:

Hello [Name Redacted],

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name Redacted]>  
**Cc:** [Names Redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name Redacted],

[Name Redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name Redacted], I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name Redacted]

[Position Redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details Redacted]

**From:** [Name redacted]  
**Sent:** 19 July 2019 15:01  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** Clyde Cod Closure

Hi [Name redacted]

I have recently started working in the [Name redacted] team at Marine Scotland and am picking up the work on the Clyde cod spawning closure.

Before we set the consultation going for the 2020/2021 closure I wanted to check whether there are any updates from the study being undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association. Is this work still ongoing? I understand that you sent through a draft report to [Name redacted] in 2017 before the last consultation. Have there been any updates to this since?

Many thanks,

[Name redacted]  
[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries

Area 1B-South, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal information redacted]



**From:** [Name redacted]  
**Sent:** 01 August 2019 11:23  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** Clyde Cod Closure

Hi [Name redacted]

Following our phone conversation I have discussed your concerns regarding the timing of the consultation for the Clyde cod closure with [Name redacted]. Whilst we appreciate your concerns, we are restricted by the legal timelines in order to have the proposed legislation in place in time for the spawning period in February 2020. This process may take longer this year due to Brexit and therefore we need to progress with the consultation as soon as possible.

As discussed, if you can please keep me informed of the meeting planned for September, we may be able to feed any updated information into the consultation as it becomes available.

Kind regards,

[Name redacted]

[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-South, Victoria Quay, Edinburgh, EH6 6QQ  
[Personal information redacted]



[Attachment Redacted] 045

**From:** [Name Redacted]  
**Sent:** 01 November 2021 10:41  
**To:** [Name Redacted]  
**Cc:** [Names Redacted]  
**Subject:** RE: Clyde Cod Surveys

Hello [Name Redacted],

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and

haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 29 October 2021 17:32

**To:** [Name Redacted]

**Cc:** [Names Redacted]

**Subject:** Clyde Cod Surveys

Good Afternoon **[Name Redacted]**,

**[Name Redacted]** has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to **[Name Redacted]**, I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

**[Name Redacted]**

**[Position Redacted]**

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

**[Contact Details Redacted]**



**From:** [Name Redacted]  
**Sent:** 28 October 2021 10:01  
**To:** [Names Redacted]  
**Cc:** [Name Redacted]  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted]

I guess it's the St Andrews Clyde surveys...I don't recall seeing an MS report on them. Copying in [Name Redacted] in case he's aware of anything.

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 09:36  
**To:** [Names Redacted]>  
**Subject:** FW: Clyde Cod report

Morning folks,

Just passing this on to you in case you knew anything more about the status of the Clyde cod report?

Thanks - [Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 08:34  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted],

[Name Redacted] spoke to [Name Redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name Redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name Redacted] couldn't provide the older published versions.

Thanks

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 27 October 2021 17:39  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name Redacted].

Just wondering if anyone is picking this up, in touch with [Name Redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name Redacted]  
[marine scotland](#)  
[Position Redacted], Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Contact Details Redacted]

**From:** [Name Redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name Redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name Redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

[Name Redacted]

On Tue, 26 Oct 2021, 18:49 [Name Redacted] wrote:

Hi [Name Redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 14 October 2021 12:53  
**To:** [Name Redacted]  
**Cc:** [Name Redacted] [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names Redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 **[Name Redacted]**> wrote:

Hello **[Name Redacted]**,

I hope this finds you well.

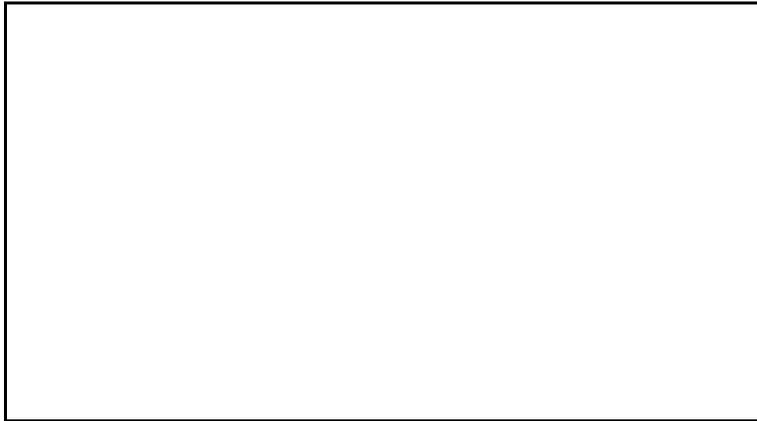
We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

**[Name Redacted]**



[Contact Details  
Redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name Redacted]  
**Sent:** 28 October 2021 11:30  
**To:** [Names Redacted]  
**Subject:** RE: Clyde Cod report

Hi,

Yes this refers to the survey that St Andrews undertakes with the CFA. I believe Allan Gibb provided some of the funding. However I have not seen any reports from St. Andrews for some years now. The survey was led by [Name Redacted] so he might be able to help.

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 10:01  
**To:** [Names Redacted]  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted]

I guess it's the St Andrews Clyde surveys...I don't recall seeing an MS report on them. Copying in [Name Redacted] in case he's aware of anything.

[Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 09:36  
**To:** [Names Redacted]  
**Subject:** FW: Clyde Cod report

Morning folks,

Just passing this on to you in case you knew anything more about the status of the Clyde cod report?

Thanks - [Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 08:34  
**To:** [Name Redacted]  
**Cc:** [Name Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted],

[Name Redacted] spoke to [Name Redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name Redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name Redacted] couldn't provide the older published versions.

Thanks

[Name Redacted]

**From:** [Name Redacted] **Sent:** 27 October 2021 17:39  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name Redacted].

Just wondering if anyone is picking this up, in touch with [Name Redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name Redacted]

[marine scotland](#)  
[Position Redacted], Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Contact Details Redacted]

**From:** [Name Redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name Redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name Redacted]

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe **[Name Redacted]** had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

**[Name Redacted]**

On Tue, 26 Oct 2021, 18:49 **[Name Redacted]** wrote:

Hi **[Name Redacted]**

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name Redacted]

**Cc:** [Name Redacted] [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names Redacted]

**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 [Name Redacted] > wrote:

Hello [Name Redacted],

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name Redacted]



[Contact Details Redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name Redacted]  
**Sent:** 28 October 2021 09:36  
**To:** [Names Redacted]  
**Subject:** FW: Clyde Cod report

Morning folks,

Just passing this on to you in case you knew anything more about the status of the Clyde cod report?

Thanks - [Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 08:34  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi **[Name Redacted]**,

**[Name Redacted]** spoke to **[Name Redacted]** last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what **[Name Redacted]** has said. Has anyone else seen these/have links to them? I'm not sure why **[Name Redacted]** couldn't provide the older published versions.

Thanks

**[Name Redacted]**

**From:** **[Name Redacted]**  
**Sent:** 27 October 2021 17:39  
**To:** **[Names Redacted]**  
**Cc:** **[Name Redacted]**; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from **[Name Redacted]**.

Just wondering if anyone is picking this up, in touch with **[Name Redacted]**, or been engaging with Openseas re follow up work / publication of the research?

**[Name Redacted]**

[marine scotland](#)  
**[Position Redacted]**, Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

**[Contact Details Redacted]**

**From:** **[Name Redacted]**  
**Sent:** 26 October 2021 19:06  
**To:** **[Name Redacted]**  
**Subject:** Re: Clyde Cod report

Hello **[Name Redacted]**,

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe **[Name Redacted]** had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

**[Name Redacted]**

On Tue, 26 Oct 2021, 18:49 **[Name Redacted]** > wrote:

Hi **[Name Redacted]**

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

**[Name Redacted]**

**From:** [Name Redacted]  
**Sent:** 14 October 2021 12:53  
**To:** [Name Redacted]  
**Cc:** [Name Redacted]; [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Name Redacted]

**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name Redacted]

On Thu, 14 Oct 2021, 12:46 [Name Redacted] > wrote:

Hello [Name Redacted],

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen’s Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

**[Name Redacted]**



**[Contact Details Redacted]**

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name Redacted]  
**Sent:** 28 October 2021 17:00  
**To:** [Names Redacted]  
**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name Redacted],

I've asked around here – we think this refers to the St Andrews Uni Clyde cod surveys, and we don't recall an MS (or MSS) report on them. The survey was led by [Name Redacted] so he might be able to help.

Cheers - [Name Redacted]

**From:** [Name Redacted]  
**Sent:** 28 October 2021 16:14  
**To:** [Names Redacted]

**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Thanks [Name Redacted],

I don't have the reports.

Can those of the copy list do a wee trawl. Would be good to try and put this to bed.

Thanks

[Name Redacted]

[Name Redacted]

[marine scotland](#)

[Position Redacted], Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Contact Details Redacted]

**From:** [Name Redacted]

**Sent:** 28 October 2021 08:34

**To:** [Names Redacted]

**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** RE: Clyde Cod report

Hi [Name Redacted],

[Name Redacted] spoke to [Name Redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name Redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name Redacted] couldn't provide the older published versions.

Thanks

[Name Redacted]

**From:** [Name Redacted]

**Sent:** 27 October 2021 17:39

**To:** [Names Redacted]

**Cc:** [Names Redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name Redacted].

Just wondering if anyone is picking this up, in touch with **[Name Redacted]**, or been engaging with Openseas re follow up work / publication of the research?

**[Name Redacted]**

**[Name Redacted]**

marine scotland

**[Position Redacted]**, Sea Fisheries Division

Scottish Government

Area 1 B South, Victoria Quay,

EDINBURGH, EH66QQ

**[Contact Details Redacted]**

**From:** **[Name Redacted]**

**Sent:** 26 October 2021 19:06

**To:** **[Name Redacted]**

**Subject:** Re: Clyde Cod report

Hello **[Name Redacted]**,

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe **[Name Redacted]** had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

**[Name Redacted]**

On Tue, 26 Oct 2021, 18:49 **[Name Redacted]** > wrote:

Hi **[Name Redacted]**

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

**[Name Redacted]**

**From:** [Name Redacted]

**Sent:** 14 October 2021 12:53

**To:** [Name Redacted]

**Cc:** [Name Redacted]; [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names Redacted]

**Subject:** Re: Clyde Cod report

Hello [Name Redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

**[Name Redacted]**

On Thu, 14 Oct 2021, 12:46 **[Name Redacted]** > wrote:

Hello **[Name Redacted]**,

I hope this finds you well.

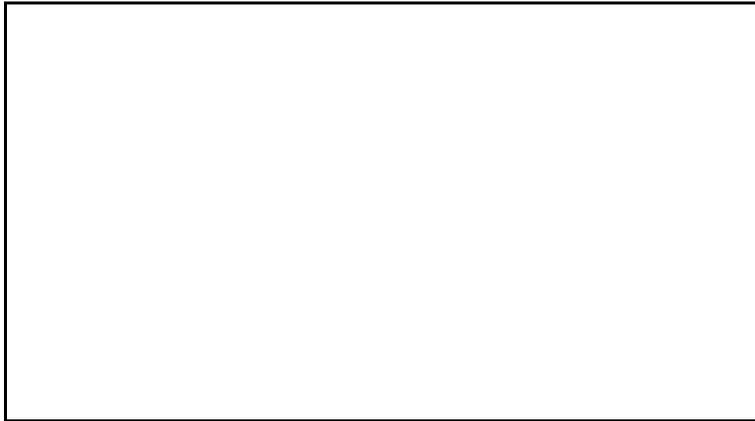
We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

**[Name Redacted]**



[Contact Details  
Redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name redacted]  
**Sent:** 01 November 2021 12:07  
**To:** [Names redacted]  
**Cc:** [Names redacted]  
**Subject:** RE: Clyde Cod Surveys

Hi [Name redacted],

I have no recollection of the reports being published by MS, I'm afraid, but I could be wrong. For meetings, I think the next month at least is going to be tricky with ongoing negotiations.

Just to note, I think [Name redacted] has now retired – I think he finished at the end of October, but [Name redacted], correct me if I'm wrong!

Cheers - [Name redacted]

**From:** [Name redacted]  
**Sent:** 01 November 2021 11:45  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** FW: Clyde Cod Surveys

Hi All,

We're still chasing round in circles on the Clyde cod reports. [Name redacted] still seems to think the previous reports have been published on our website. Does anyone have any recollection of this happening?

Also in terms of resource for a meeting to get the latest report finalised – what is required for this, and is this likely to be able to happen any time soon?

Many Thanks,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 01 November 2021 10:59  
**To:** [Names redacted]  
**Cc:** [Names redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>; [Names redacted]  
**Subject:** Re: Clyde Cod Surveys

Hello All,

For clarity, what previously happened was [Name redacted] and his team came on trials and wrote up findings. There would then be a meeting called where Marine Scotland would look over the results with CFA and St Andrews Scientists, any points would be picked up on the report or it was simply agreed, then a forward rough plan would be made and agreed for the next surveys. This would also be the point that any reports were published on the Marine Scotland website.

About 3 years ago there was an issue with funding and resourcing, not from the CFA side as we were keen to keep the work going and support it, but it was a lack of resource I believe at MS Labs and related to funding cycles. It was expected at the time to be a short term issue, and although no firm commitments were given there was good will to keep the work going if possible. It was noted at the time missing a year wouldn't impact the data too much in any case.

Of course this was followed by Covid, and Brexit issues. This has resulted in the normal meeting we would have had after the last trials not happening, although we have requested this a number of times we do appreciate Marine Scotland resources and time were limited to take a meeting forward. We do hope we can have one shortly to go over the last reports. Usually after the meeting the reports would be available online through the Marine Scotland website.

In addition there has been a collection of otoliths which have been maintained from the trials but not aged etc. That might be a piece of work we want to collectively consider going forward.

So really from our perspective we have passed the report from St Andrews on to Marine Scotland, and we would hope at some point soon to have a meeting to go over the report and consider any future work if possible. We would be happy for a date to be set and we can work around everyone's best availability.

We wouldn't have passed the report out until we had the trials wash up meeting collaboratively, and as previously we would expect it would then be available on the MS website.

Many thanks,

[Name redacted]

On Mon, 1 Nov 2021, 10:41 [Name redacted]wrote:

Hello [Name redacted],

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name redacted],

[Name redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name redacted], I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the

past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name redacted]

[Name redacted]

[Position redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details redacted]

[Attachment redacted] - 111

**From:** [Name redacted]

**Sent:** 01 November 2021 10:41

**To:** [Name redacted]

**Cc:** [Names redacted]

**Subject:** RE: Clyde Cod Surveys

Hello [Name redacted],

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name redacted]  
**Cc:** [Name redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name redacted],

[Name redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name redacted], I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name redacted]  
[Position redacted]  
Marine Scotland - Sea Fisheries  
Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ  
[Contact Details redacted]



**From:** [Name redacted]  
**Sent:** 28 October 2021 16:14  
**To:** [Names redacted]  
**Cc:** [Names redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Thanks [Name redacted]

I don't have the reports.

Can those of the copy list do a wee trawl. Would be good to try and put this to bed.

Thanks

[Name redacted]

[Name redacted]

[marine scotland](#)

[Position redacted], Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Personal information redacted]

**From:** [Name redacted]

**Sent:** 28 October 2021 08:34

**To:** [Names redacted]

**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** RE: Clyde Cod report

Hi [Name redacted],

[Name redacted] spoke to [Name redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name redacted] couldn't provide the older published versions.

Thanks

[Name redacted]

**From:** [Name redacted]

**Sent:** 27 October 2021 17:39

**To:** [Names redacted]

**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name redacted].

Just wondering if anyone is picking this up, in touch with [Name redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name redacted]

[Name redacted]

[marine scotland](#)

[Position redacted] Sea Fisheries Division

Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Personal info redacted]

**From:** [Name redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name redacted],

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

[Name redacted]

On Tue, 26 Oct 2021, 18:49 [Name redacted] > wrote:

Hi [Name redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 14 October 2021 12:53  
**To:** [Name redacted]  
**Cc:** [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot); [Names redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name redacted]

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name redacted]

On Thu, 14 Oct 2021, 12:46 [Name redacted] > wrote:

Hello [Name redacted]

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*"More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time."*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name redacted]



[Personal info redacted]

[A Scottish Charitable Incorporated Organisation SC045699 | Sign up for our newsletter <<](#)

**From:** [Name redacted]

**Sent:** 27 October 2021 10:15

**To:** [Names redacted]

**Subject:** RE: Clyde Cod - response to report complaints

Your response is fine

**From:** [Name redacted]

**Sent:** 22 October 2021 14:04

**To:** [Names redacted]

**Subject:** Clyde Cod - response to report complaints

Hi [Name redacted],

The two requests for the report are below in blue. Please see my suggested response in red.

## SIFT

Thank you [Name redacted], I wonder if you could provide by return the CFA report mentioned in the consultation response? When it is requested of CFA they reference that it is with you?

Kind regards

[Name redacted]

----

## Open Seas

Hello [Name redacted],

Just a quick follow up.

We note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

We have requested the document from the Clyde Fishermen's Association today, but one of their representatives has said it is unavailable at this time. You and Marine Scotland colleagues were cc'd into this correspondence.

However, this would seem to contradict the guidance in the Government's consultation document which indicates that the report would be made accessible to stakeholders on request.

Noting our concern that a public consultation is potentially being influenced by the inclusion of the government's stated views (para 12) based on the early results of a report that is currently unpublished and inaccessible to other stakeholders, are you able to share the report?

Kind regards,

[Name redacted]

---

Dear XXX

Thank you for your email regarding Clyde cod and the CFA survey results. Unfortunately, due to the pandemic there has been a delay in the CFA report being published. Whilst a draft has been produced, this is not yet ready to be shared as it hasn't yet been signed off by all the parties involved.

We apologise for this, but given the required time for getting a future SSI through the parliamentary process (should that be the outcome of the consultation) the consultation couldn't be delayed to wait for the report to be published.

Once we receive a copy of the final report we will of course be happy to share this with you, if you haven't already received it from the CFA.

Kind regards,

[Name redacted]

[Position redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Contact Details redacted]



**From:** [Name redacted]

**Sent:** 28 October 2021 16:14

**To:** [Names redacted]

**Cc:** [Names redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>

**Subject:** RE: Clyde Cod report

Thanks [Name redacted],

I don't have the reports.

Can those of the copy list do a wee trawl. Would be good to try and put this to bed.

Thanks

[Name redacted]

[Name redacted]

[marine scotland](#)

[Position redacted], Sea Fisheries Division

Scottish Government

Area 1 B South, Victoria Quay,

EDINBURGH, EH66QQ

[Personal Information redacted]

**From:** [Name redacted]  
**Sent:** 28 October 2021 08:34  
**To:** [Names redacted]  
**Cc:** [Names redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** RE: Clyde Cod report

Hi [Name redacted],

[Name redacted] spoke to [Name redacted] last week and touched on the report. We have responded to emails from both Open Seas and SIFT regarding the paper not being published as yet, but both are still unhappy about this. SIFT are threatening an FOI (though given the report is still in draft, I understand this would be exempt).

I've hunted in eRDM but we only seem to have drafts of previous reports so am not aware that we have the final versions published on our webpages though that's what [Name redacted] has said. Has anyone else seen these/have links to them? I'm not sure why [Name redacted] couldn't provide the older published versions.

Thanks

[Name redacted]

**From:** [Name redacted]  
**Sent:** 27 October 2021 17:39  
**To:** [Names redacted]  
**Cc:** [Names redacted] Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** FW: Clyde Cod report

I was blind copied into this last night, and no idea who is on the copy list from [Name redacted].

Just wondering if anyone is picking this up, in touch with [Name redacted], or been engaging with Openseas re follow up work / publication of the research?

[Name redacted]  
[marine scotland](#)  
[Position redacted], Sea Fisheries Division  
Scottish Government  
Area 1 B South, Victoria Quay,  
EDINBURGH, EH66QQ

[Contact Details Redacted]

**From:** [Name redacted]  
**Sent:** 26 October 2021 19:06  
**To:** [Name redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name redacted],

No problem at all.

We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.

However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.

The prior reports were on the Marine Scotland site when they were released, I believe [Name redacted] had referenced them previously so they have been circulating and should be available publically when google searched.

Thanks again,

[Name redacted]

On Tue, 26 Oct 2021, 18:49 [Name redacted] > wrote:

Hi [Name redacted]

Understood and thanks for your reply.

I've de-cc'd your colleagues and Marine Scotland officials to avoid clogging inboxes, but please obviously feel free to re-cc if you'd prefer.

Is there any project description about the study you can share in the interim prior to its publication, ie basic info about the objectives of the study and when the research was carried out?

We will touch base with Marine Scotland as future publishers of the research, as you suggest.

I've also tried to find previous reports on Marine Scotland website, but not sure which ones you mean. Could you point me to them?

Thanks,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 14 October 2021 12:53  
**To:** [Name redacted]  
**Cc:** [Name redacted] [Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot);

Copy: [Names redacted]  
**Subject:** Re: Clyde Cod report

Hello [Name redacted],

We don't have the final signed off version.

Normally the academics, Marine Scotland and the fishermen involved in the trials will meet to sign off on the report and plan potential next stages of research.

Due to covid and Brexit as far as I am aware there hasn't been an official sign off of the last report. The previous reports which have been approved are on the Marine Scotland website, but from our side we hope to have a meeting soon to consider the report and ways forward.

Hopefully then it will be published as the previous reports were.

Many thanks,

[Name redacted]

On Thu, 14 Oct 2021, 12:46 [Name redacted] > wrote:

Hello [Name redacted],

I hope this finds you well.

We have recently responded to the Scottish Government's consultation and request for views about the Clyde cod spawning closure 2022/2023. I note that the government's consultation letter states that:

*“More recently, a study was undertaken by the Scottish Oceans Institute and Clyde Fishermen's Association (CFA) during the spawning period with demersal and pelagic gears. A final version of the report can be requested from the CFA. Early results from the study show the presence of spawning cod in the closed area during the closure period, indicating that the closure is in the right place at the right time.”*

Would the Clyde Fishermen's Association be able to share the final version of the report?

Regards,

[Name redacted]



[Name redacted]

**Open Seas**

[Contact Details redacted]

**From:** [Name redacted]

**Sent:** 01 November 2021 12:17

**To:** [Names redacted]

**Cc:** [Names redacted]

**Subject:** RE: Clyde Cod Surveys

Hi [Name redacted]

Me neither, and I've no recollection of seeing anything 'in draft' either.

[Name redacted]

**From:** [Name redacted]  
**Sent:** 01 November 2021 12:07  
**To:** [Names redacted]  
**Cc:** [Names redacted]  
**Subject:** RE: Clyde Cod Surveys

Hi [Name redacted]

I have no recollection of the reports being published by MS, I'm afraid, but I could be wrong. For meetings, I think the next month at least is going to be tricky with ongoing negotiations.

Just to note, I think [Name redacted] has now retired – I think he finished at the end of October, but [Name redacted], correct me if I'm wrong!

Cheers - [Name redacted]

**From:** [Name redacted]  
**Sent:** 01 November 2021 11:45  
**To:** [Names redacted]  
**Cc:** [Names redacted]  
**Subject:** FW: Clyde Cod Surveys

Hi All,

We're still chasing round in circles on the Clyde cod reports. [Name redacted] still seems to think the previous reports have been published on our website. Does anyone have any recollection of this happening?

Also in terms of resource for a meeting to get the latest report finalised – what is required for this, and is this likely to be able to happen any time soon?

Many Thanks,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 01 November 2021 10:59  
**To:** [Name redacted]  
**Cc:** [Names redacted]; Gibb AG (Allan) <[Allan.Gibb@gov.scot](mailto:Allan.Gibb@gov.scot)>  
**Subject:** Re: Clyde Cod Surveys

Hello All,

For clarity, what previously happened was [Name redacted] and his team came on trials and wrote up findings. There would then be a meeting called where Marine Scotland would look over the results with CFA and St Andrews Scientists, any points would be picked up on the report or it was simply agreed, then a forward rough plan would be made and agreed for the next surveys. This would also be the point that any reports were published on the Marine Scotland website.

About 3 years ago there was an issue with funding and resourcing, not from the CFA side as we were keen to keep the work going and support it, but it was a lack of resource I believe at MS Labs and

related to funding cycles. It was expected at the time to be a short term issue, and although no firm commitments were given there was good will to keep the work going if possible. It was noted at the time missing a year wouldn't impact the data too much in any case.

Of course this was followed by Covid, and Brexit issues. This has resulted in the normal meeting we would have had after the last trials not happening, although we have requested this a number of times we do appreciate Marine Scotland resources and time were limited to take a meeting forward. We do hope we can have one shortly to go over the last reports. Usually after the meeting the reports would be available online through the Marine Scotland website.

In addition there has been a collection of otoliths which have been maintained from the trials but not aged etc. That might be a piece of work we want to collectively consider going forward.

So really from our perspective we have passed the report from St Andrews on to Marine Scotland, and we would hope at some point soon to have a meeting to go over the report and consider any future work if possible. We would be happy for a date to be set and we can work around everyone's best availability.

We wouldn't have passed the report out until we had the trials wash up meeting collaboratively, and as previously we would expect it would then be available on the MS website.

Many thanks,

[Name redacted]

On Mon, 1 Nov 2021, 10:41 [Name redacted] wrote:

Hello [Name redacted]

There may be some misunderstanding here. We have helped the CFA in a series of trawl surveys in Spring (and autumn) to quantify catch rates and length frequency distributions of cod whiting and haddock in the Clyde estuary. For each survey (or pair of annual surveys) we have written up a cruise report for the CFA, which they hold. The latest report was for 2018 (attached), and we have done no more in 2019, 20 or 21 mainly due shifting Brexit and Covid related priorities since then. Our attitude has been that these reports belong to the CFA and we have made no effort to publish them.

The latest (2018) cruise report I had understood had been sent to Marine Scotland and I think we expected there might be some feedback at some point. There was never a project of the type that a 'final report' might imply, simply an ongoing willingness to help the CFA in understanding more about their fish stocks. We had anticipated that as time went on, we would refine the sampling

strategy and provide a robust longer-term data set to enable the CFA to monitor changes in fish stocks.

If we have missed something in terms of our responsibilities, please let us know!

We would also be interested to see your Clyde cod spawning closure consultation.

Kind regards,

[Name redacted]

**From:** [Name redacted]  
**Sent:** 29 October 2021 17:32  
**To:** [Name redacted]  
**Cc:** [Names redacted]  
**Subject:** Clyde Cod Surveys

Good Afternoon [Name redacted]

[Name redacted] has pointed me in your direction and I'm hoping that you might be able to help me track down some reports from the Clyde cod surveys that were carried out between St Andrews University and Clyde Fishermen's Association in recent years? From speaking to [Name redacted], I understand that the final report is still in draft mode, however I wonder if any of the previous progress reports have been published? If so would you be able to provide links to them please? We only have draft versions that CFA have provided in the past. As we have referred to this study in our current Clyde cod spawning closure consultation, a number of people have requested a copy of such reports. We have advised them that the final version is still in draft and cannot be released yet, however we were hoping there may be some initial results that have been published that we can pass on.

Many thanks!

[Name redacted]

[Name redacted]

[Title redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal information redacted]

**From:** [Name redacted]

**Sent:** 15 June 2021 15:31

**To:** [Name redacted]

**Subject:** Clyde Cod

As promised...an updated version of the clyde cod doc incase you have chance for a look before we chat tomorrow. Feel like I've been staring at it for so long now so it would be good to have any feedback!



[Attachment redacted]

[Name redacted]

[Position redacted]

Marine Scotland - Sea Fisheries

Area 1B-North, Victoria Quay, Edinburgh, EH6 6QQ

[Personal contact detail redacted]

W: [www.gov.scot/marinescotland](http://www.gov.scot/marinescotland)

marine  
scotland



Scottish Government  
Riaghaltas na h-Alba  
gov.scot