



Scottish Fishermen's Federation

24 Rubislaw Terrace
Aberdeen AB10 1XE
Scotland UK

T: +44 (0) 1224 646944

F: +44 (0) 1224 647058

E: sff@sff.co.uk

www.sff.co.uk

Our Ref: MM/fi/L01-011

Your Ref: PE1386

27th January 2011

The Public Petitions Committee
TG01
The Scottish Parliament
EDINBURGH
EH99 1SP

Dear Sirs,

Reference: Petition PE1386

The Scottish Fishermen's Federation (SFF) consists of 9 Associations with membership covering Scotland from Eyemouth to Shetland and Kinlochbervie to the Clyde. As the largest representative group of fishermen, we welcome the opportunity to respond to this petition but are compelled to register our concerns about the poor distribution of the consultation letter and the lack of time available to formulate a cohesive response. This is further compounded by the statement in the letter that "the petitioner must be given the same length of time to prepare their response as you". We have been allocated a week to respond, while the petitioner will have 20 days to spare.

This is not the democratic way to conduct such important business, especially given that our Inshore and Sustainable Fisheries Committees are not scheduled to meet until 8th March and this is exactly the sort of matter which they would in normal run of things deal with.

Notwithstanding our disquiet at the timescale imposed on us, we are also concerned that Marine Scotland Science is not on the distribution list.

This concern stems from our belief that any proposal for a management scheme should be scientifically based, time-bound and measurable, and the petition fails to meet any of these criteria. Given the problems that the current Statutory Instrument has brought to light, we feel that the petition would only serve to export these problems to a wider area.

It is the position of the SFF that we have been working co-operatively with Marine Scotland (and its fore-bearers) to institute a democratically accountable national system to enhance and protect the Inshore Fisheries of Scotland. This has been done via the medium of the Inshore Fisheries Groups which we consider to be the method which best allows for stakeholder input and agreement on management measures.

Members:

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

Mallaig & North-West Fishermen's Association
Orkney Fisheries Association
Scallop Association

Scottish Pelagic Fishermen's Association Ltd
Scottish Whitefish Producers' Association Ltd
Shetland Fishermen's Association

VAT Reg. No: 605 096 748

The SFF has also been working vigorously within the sphere of the Scottish Fisheries Council sub-groups, to promote proper species, method and spatial management, which has been a fully documented, stakeholder led workstream and it would be wrong to ignore this significant body of work on the best ideas for inshore fisheries at the behest of any one group who choose to use the petition committee to further their own aims at the expense of others.

The Torndon grouping as can be seen from its own petition has been fully involved in the ongoing development of inshore policy in Scotland and while we can appreciate their frustration we are strongly of the opinion that the process, including imminent arrival of a creel spatial management policy from Marine Scotland should be the correct way forward.

The SFF would oppose statement such as “creel fishing benign impact on the seabed more damaging trawling” with the proposition that certain science would say that creels take a disproportionate amount of females, and the very reason for suspension of the Torndon MSC accreditations is a demonstration of the impact of a large number of creel vessels can have on an area with no trawlers active. There is also a recent report from the Sea Mammal Research Unit (CR/2007/49) to the Scottish Government which shows that there is an increasing incidence of entanglement of Minke whales in Scottish waters due to creel ropes.

There is an MSC accredited Nephrops Trawl fishery in Stornoway that has not highlighted any of the problems experienced by the Torndon group. This fishery has had its annual audit recently, resulting in a recommendation for continued accreditation with no further conditions attached.

It is also our understanding that the Scottish Licence Review Working Group will shortly be issuing a consultation paper on how licensing can be restricted to prevent more vessels from entering the under 10m nephrops fishery.

To put it into one concise paragraph, we understand the Torndon position, but do not think that attempting a quick fix to suit themselves, while undermining the national work going on is a good way to do business. We are in essence opposed to this petition.

Yours faithfully,

Signed on Original

Bertie Armstrong
Chief Executive
Scottish Fishermen's Federation