



## Shetland Fishermen's Association

Shetland Fishermen's Association  
Shetland Seafood Centre  
Stewart Building  
Lerwick  
Shetland  
ZE1 0LL

Telephone: 01595 693 197  
Fax: 01595 694 429  
Email: [info@shetlandfishermen.com](mailto:info@shetlandfishermen.com)

**PE1431/A**

Stuart Todd  
Assistant Clerk to the Public Petitions Committee  
The Scottish Parliament  
Edinburgh EH99 1SP

2<sup>nd</sup> July 2012

Dear Mr Todd,

### **Petition PE1431 (Designation of Fair Isle Waters as an MPA)**

I write on behalf of the Shetland Fishermen's Association (SFA) in reply to your letter of 28<sup>th</sup> June, in which you seek the Association's views of the above petition.

At the outset, I must stress that the SFA respects the ambitions and aspirations of the Fair Isle community, and in general would wish to offer them our support. However, the SFA is not in favour of management measures that may limit or prevent access by Shetland fishing vessels to traditionally fished areas.

However, the SFA has a number of reservations about the proposed designation of a marine protected area in the waters around Fair Isle proposal, including:

- ◆ Despite being - we would believe - one of the main stakeholders in the waters around Fair Isle, the SFA has not been involved in the development of the proposal (contrary to the statement made to the Petitions Committee by the proposal's backers). Although the proposal may have been mentioned at meetings at which the SFA was represented, the Association has never been formally invited to contribute to, or comment on, the proposal.
- ◆ The SFA is concerned by the lack of detail and basic information in the proposal. For example, it is not clear what area the proposed MPA would actually cover. Also, no information is given about how the proposed MPA would operate, about what sort of management measures might be tested,

about how trials might be carried out, or about how the results would be evaluated and utilised.

- ◆ Similarly, no information is given about how the proposed MPA, and the associated demonstration and research programme, would be managed. If the proposed MPA should be established we strongly believe that appropriate management mechanisms, including representation of relevant experts and interested parties, should be established. We do not believe it would be appropriate for the Fair Isle community to assume sole control over management measures that have the potential to affect parties from outside the island.
- ◆ We do not feel that the Fair Isle community has the appropriate resources or expertise to design, execute or evaluate the sort of trials that would be required to meaningfully test different management measures (which would require, amongst other things, catch sampling and monitoring, sea-bed monitoring, etc.).
- ◆ Overall, we feel that the proposed Fair Isle MPA lacks any clear purpose, other than the desire to have an MPA, and has no specific objectives (such as the protection of particular habitats or species). We feel that the proposal to create a 'Demonstration and Research MPA' is motivated more by the desire to secure an MPA than by a real desire to carry out meaningful research or demonstration trials. We would question, therefore, whether a Demonstration and Research MPA is an appropriate mechanism to pursue.
- ◆ We feel that many of the statements made regarding fishing in the waters around Fair Isle, and its possible effects, are unsubstantiated and do not reflect modern fishing practices.
- ◆ We believe that management measures implemented within any Fair Isle MPA would be very unlikely to have any significant effects on fish stocks - either in the waters around Fair Isle or in a wider area - given their highly mobile nature.

In more general terms, it is the Association's view that the proposal to designate the waters around Fair Isle as a marine protected area cannot be viewed in isolation, but as part of a wider series of current and proposed management measures, and other restrictions, that we fear could restrict fishing activity in significant areas around Shetland. These include Real-Time Closures (under the Cod Recovery Plan), proposals for other marine protected areas (several others have been, or may be, proposed around Shetland), and loss of access as a result of developments such as pipelines, sub-sea cables, renewable energy projects, etc. These come on top of a raft of other management measures, such as quotas and limits on days at sea, that continually restrict the fishing opportunities for local fishermen.

While the effect of any one of these, such as the proposed Fair Isle MPA, may not appear very significant when taken in isolation, the cumulative effects of some or all of these management measures and restrictions may become so.

In conclusion, for the reasons outlined above the Shetland Fishermen's Association feels that it has no option but to oppose the proposed designation of the waters around Fair Isle as an MPA.

Please do not hesitate to contact me again if you should have any queries or require any further information regarding this response.

Yours Sincerely,

Leslie Tait,  
Chairman - Shetland Fishermen's Association.