

Ross, Sutherland, Skye & Lochalsh Fisherman's Association

19 Windsor Crescent, Portree, Ilse of Skye IV51 9EA.

jamescori@msn.com

Strategy for the sustainable development of north-west Highland coastal fisheries and associated dependent communities.

Introduction

The Ross, Sutherland, Skye & Lochalsh Fisherman's Association (RSSLA) comprise owners, skippers and crew of smaller licensed commercial fishing vessels, predominantly from within the mobile sector, harvesting the inshore waters between Cape Wrath and Islay and landing their catch on a daily basis. Our memberships' driving ambition is to grow and maintain their current, future generations, and the wider coastal community's livelihoods within a thriving and sustainable local commercial mixed-gear fishery. To best achieve this goal we recognise the need to open a constructive and progressive dialogue with all interested and supportive parties; specifically, Marine Scotland, Local Authorities, scientifically principled conservation bodies, marine 'renewables' exploitation businesses, and competing commercial fishing practices and practitioners.

Tourism aside, the commercial fishing sector is the major economic driver within our north-west Highland coastal communities and the significance of its current and future health cannot be overemphasised in the sustainable prosperity and socio-economic viability of this fragile region. The Marine (Scotland) Act 2010 laudably recognised the need for a visionary and strategic approach upon all matters relating to Scotland's seas and coastal waters whilst championing the importance of transparent and collective dialogue from all marine stakeholders: eight years have elapsed during which time Scotland's inshore fisheries have seen little more than localised 'tinkering' and bickering with blatant self-interest proposals between bodies and sectors seeking localised dominance in the use of this collective national asset.

RSSLA members wish to reinvigorate the ambition outlined within the Marine (Scotland) Act with immediate focus upon the north-west Highlands. Our members firmly believe that only by engaging with all potential users and beneficiaries can the necessary strategic thread be successfully woven throughout these diverse interests, and that only a truly visionary and co-operative approach will encourage the investments required to enhance current and future participants, and their communities, sustainable viability. The current climate of haphazard and directionally blurred inshore fisheries policymaking foments uncertainty, which in turn curtails investment. We contend this must cease, and be replaced with the visionary leadership needed to embed proportional, appropriate, and balanced fishery policy within these wider 'user' frameworks. We also propose greater understanding of each other's specific ambitions and priorities coupled to enhanced but flexible and relevant scientific evaluation. We aim to articulate our views in the hope of encouraging all interested parties to respond in a manner that will motivate collective purpose in the socio-economic advancement of all north-west Highland coastal communities.

To grasp this vision it's important we understand commercial fishing's recent past.

Brief history

Since the removal of the 'three-mile limit' in the mid-1980s these inshore waters have witnessed many changes to both fishing practices and catches landed. Gone are the days of a more varied harvest from demersal and pelagic species by a dominant mobile sector. Current market forces determine that shellfish, predominantly prawns, are the focus of the vast majority of local commercial fishing interests; with these sustainable stocks being targeted by a diminishing but stringently regulated local mobile fleet and a disproportionately large and expanding unregulated creel fishery. A plethora of local commercial fishing inhibitions and prohibitions have been implemented either through the introduction of MPAs or more historic stock conservation and evaluation Statutory Instruments (SI). Many of the SIs are no longer scientifically relevant, or have never been evaluated within their stipulated time-compliant control period and could therefore arguably be deemed lapsed and no longer enforceable. Localised seasonal closures upon mobile sector fishing result in spikes of itinerant vessel activity annually from April to October; additional spatial pressures come from the Inner Sound M.O.D. restrictions, a burgeoning aquaculture industry and more recently from the marine renewables business.

The last thirty years has seen a steady decline in infrastructure investment with some local harbours falling to such disrepair they are no longer of use. Similarly, with the decline of the mobile fleet boat-building and boat repair yards have largely ceased to exist in all but the major ports; with a similar decline in allied engineering and general chandlery business investment. Similarly, there has been a steady decline in local catch processing with resulting employment and economic consequences. Currently, a myriad of east-coast processors vehicles travel daily to preordained landing sites, adding value to that economy to the detriment of our own.

Markets remain the pivotal force in all north-west Highland commercial fishing. Prawn harvesting in these waters became viable in the early 1970's, with the vast majority of creel produce destined for export and the trawled catch divided between export and UK 'scampi' processors. Little has changed over time with around 90% of creel produce still heading to the premium priced 'live' markets within Europe; however, trawled catches have recently enjoyed a more diverse market expansion with whole fresh and frozen prawns more widely available within UK supermarkets.

CFP regulations upon zonal and species harvesting coupled to catch quota 'markets' have strangled catch diversity opportunities for RSSLA members with allocated pelagic quotas too small for market viability given the dearth of local processing investment. It remains incongruous that members are permitted to land squid as by-catch but are prohibited from targeting such a locally abundant, sustainable, and lucrative species.

Moving forward...

Spatial management and sustainable stock evaluation proposal

Our members fully support and wish to maintain a thriving mixed fishery within these waters.

Current inhibitions and restrictions upon commercial fishing across all catch methods and sectors within the inshore waters of the north-west Highlands need to be immediately re-assessed with any future impositions agreed with underpinning scientific evidence and appropriate timely evaluation criteria. Our members also believe the unfettered increase in unregulated creel fishing must be curtailed, and then controlled with similar rigorous monitoring as now applies to the mobile sector for the enhanced protection of sustainable prawn stocks. No reasonable forward looking fishery policy should entertain any continuance of the *status quo* without the settlement of these two fundamental issues. Discussions upon restricting creel numbers per vessel, standardising mesh size, mandatory use of escape panelled creels, creel tagging and numbering coupled to local permit-licensing schemes that accommodate new young fishermen has been going on for most of the last decade in various regional Inshore Fisheries Groups and national fisheries forums – enough is enough – legislation must be enacted for the safeguarding of sustainable stocks.

A balanced mixed fishery within this region best serves and exploits current markets. Creel caught prawns enjoy rich markets in Europe, particularly Mediterranean European and long may they continue to do so. However, fisheries policy must take heed of potential market volatility within this area that may ensue from tariff impositions and disruption to the logistics network (dead prawns won't command sufficient revenue to support the creel fishermen) surrounding Brexit. Whereas mobile caught prawns enjoy successful and profitable demand within the mixed (and growing) home and European markets, thus offering a much greater surety of sustainable wealth creation within the entire north-west Highland fishing community. Indeed, recent growth in the sale of whole fresh dead produce within Italy – albeit to the detriment of live creel caught sales - reinforce this self-evident need to promote our mixed fishery within all future inshore fisheries policy.

Greater understanding of market forces and opportunities should influence future fisheries policy with greater emphasis and support being directed to local entrepreneurial activities. Our members have been enthusiastic supporters and donors of produce to amongst others; Seafood in Schools initiatives, Highland Seafood Markets, the Seafood-See Here campaign; and would welcome greater interaction and involvement with all Scotland's Food and Drink initiatives.

This area has been fraught with spatial management issues, mostly aforementioned, but in the last twenty-five years solely exacerbated by the exponential increase of creel boat numbers and their need to fish ever greater numbers of creels per vessel to counter the slump in yield per unit fished; predominantly in the creel fishermen's "honey pot" areas adjacent to the major centres of population abutting the coastal waters of both Loch's Broom, Lochalsh, the Inner Sound, and Loch Linnhe. Out with these "honey pot" areas the mixed fishery thrives with few instances of adverse 'gear interaction' being reported. This same period has seen a halving of indigenous mobile activity. Alarming, the creel fishermen's naïve submissions that spatial conflict can only be resolved by ring-fencing fishing grounds exclusively for their use, not only seeks to repeat the failed Torridon Box experiment, but risks the regions certain collapse of sustainable prawn stocks. The certainty that all existing mobile vessels would immediately transfer to creel fishing (which their licenses permit), and with ever greater numbers of similarly re-equipped vessels thus being attracted to a completely unregulated but protected fishery, is absolute. Equally certain would be the price destructive over-supply of a produce to a potentially already volatile market. Result – economic implosion and a hitherto sustainable prawn stock decimated. This utterly destructive scenario is both predictable and eminently avoidable.

Any single species fishery, which these waters effectively are, needs constant scientific evidence based monitoring of stocks. Our members submit that to date such 'marine science' activity has been haphazard in the extreme with little more than simplistic and fanciful burrow counting within very small boundaries and we urgently ask for and support greater interaction with Marine Scotland to address this fundamental issue. To underscore our commitment to responsible stock management we propose a minimum three week period annually, say around April and May, when there is a total ban on prawn fishing by mobile and creel boats alike within these waters, with all nets and creels removed from the sea. We believe this would significantly protect and enhance prawn stocks with the additional benefits of allowing both an unhindered period for scientific evaluation, and to allow compliance officers the opportunity to examine and certify all nets and creels whilst ashore. Markets at this time of year are generally quiet and product shortfall could be made up from other Scottish fisheries. Marine Scotland may wish to consider such an approach nationally within inshore waters over a rolling period to limit undue market pressures. We believe this to be a thoroughly responsible approach.

Further easing of pressure on the prawn stocks could be achieved by encouraging greater choice of harvest opportunities; specifically, from within the plentiful pelagic crops of herring and mackerel if sanctioned for all under 12 metre vessels. Whilst the north-west Highlands has an allocated pelagic quota at present it is too low to encourage sustained processor and market interest to be a seasonally viable fishery. Squid too offer plentiful opportunities but for the ridiculous anomaly that they cannot be targeted "west of four" with the appropriate net mesh size approved elsewhere in Scotland's inshore waters. We similarly seek Marine Scotland's assistance in this matter's resolution.

RSSLA are convinced that the evidence of history will prove that the reintroduction of greater species harvest opportunities for our members, coupled to a rolling local prohibition of prawn fishing with all gear removed from the water will greatly enhance the economic health of our socio-economically fragile coastal fishing communities: we believe this to be balanced, proportional, and appropriate.

Aquaculture expansion and marine renewables integration

Our members are fully supportive of all maritime employment and wealth generation opportunities within our north-west Highland coastal communities. However, fish-farming due to technological advances, is no longer offering the employment opportunities of a decade ago but continues to expand its presence within our lochs and sheltered coastal areas, often at the expense of traditionally lucrative fishing grounds. We seek a more balanced and controlled approach, especially from within the local planning application authorities. Our brethren in the creel community are particularly blighted by the common practice of multiple planning applications submitted by a range of aquaculture producers, simultaneously over a small area of coastal waters. This 'scatter-gun' approach is cynically favoured by aquaculture companies in the belief that not all will be either vigorously opposed, nor declined by the local authority – bluntly, that some will slip through whether they be economically appropriate for our traditional fishing communities or not. Infuriatingly, even should an application be dismissed at the planning stage from applicant A, it is not uncommon for a repeat application for the same site to be submitted by applicant B within a very short space of time. This concern has been raised historically within the Inshore Fisheries Group framework with the suggestion that a moratorium be placed upon applicants applying to previously rejected sites, both with a timeframe and site proximity restriction attached, with no constructive outcome. We ask that Marine Scotland and local authorities revisit this issue.

Additionally, and more alarmingly, our members continuously find that the fish-farm 'foot print' awarded and registered for planning (and all subsequent mapping) is breached by unlawful over-reached anchoring. This not only causes damage to mobile and creel gear alike but may also have catastrophic implications to vessel and crew safety when vessels become 'fast' upon such illegal obstructions. RSSLA urgently request that Marine Scotland, in conjunction with local authorities and the Crown Estate (from whom the 'foot print' is nominally leased) to implement a protocol of monitoring and compliance in this matter. Might we also propose that a standing body, possibly under the remit of Marine Scotland Compliance, be constituted to arbitrate upon and redress such contraventions?

RSSLA members have no desire to inhibit the growth of aquaculture, but we do seek that all such expansion is balanced, proportional, and appropriate.

Marine renewables' development requires a similarly well-judged and visionary approach when viewed in conjunction to its potential impact upon traditional commercial fishing revenues. We call upon the Scottish Government in conjunction with Marine Scotland to rigorously examine some balanced method of levy whereby commercial fishing interests and their adjacent coastal communities are recompensed for fishing grounds ceded to marine renewable exploitation, say upon a kilowatt extraction basis. We believe it probably too late for such recompense to be applied retroactively within the aquaculture industry, but see no reason for it not to be pursued within the fledgling but burgeoning marine renewables sector.

Infrastructure and economic amenities development

The vast majority of piers and harbour facilities used by commercial fishermen within the north-west Highlands are local authority owned and run, with a similar proportion in urgent need of update and repair, and with a few in such a state of disrepair they are no longer safely fit for purpose. Our members are acutely aware there is little money available to

address this unfortunate state of affairs; however, we do believe that with constructive local authority interaction what little investment in infrastructure that is possible could be better apportioned. We propose that all current and future maritime infrastructure development funding, whether it be Calmac, local authority, EMFF, M.O.D., or private, be overseen in its application to include where appropriate commercial fishing interests and the local fishing community's entrepreneurial ambitions. Recent infrastructure development has been haphazard and single project led with no vision as to how its introduction might impact upon providing enhanced economic amenity for the local business environment. Greater strategic thought needs to be applied and we propose this vision be written in to the process at the outline planning stages within all local authorities statutory obligations remit.

Our members are aware that a small number of highly beneficial infrastructure and amenity developments have been provided through a plethora of European funding and extraneous grant initiatives; but these have been predominantly instigated through strong local community based leadership with little wider technical or administrative support and guidance. We believe so much more might be achieved from these limited funding opportunities if a more regional commercial fishing interest might be interacted with on an on-going basis. We propose that Marine Scotland seek to construct and oversee such a duly constituted regional body to vigorously identify appropriate funding bodies and coordinate expertise and effort to enhance the commercial fisheries infrastructure and economic amenities development opportunities so desperately needed.

The mobile commercial fishing activity in this area provides the overwhelming majority of need for local marine engineering businesses, boatyard facilities, fishing gear manufacturers, and associated chandlery outlets. These businesses in turn need adequate infrastructure and amenities to supply this demand. A more coordinated and priority driven investment in the basics of adequate lighting, fresh water, storage, sanitary, and refuse disposal facilities would be a welcome start.

It frustrates our members when they see their north-west Highland caught and landed prawns being immediately transported, either abroad or to the east coast for even the most basic of processing, without there being any added value to the immediate local economy. We firmly believe that a priority of all future infrastructure and amenities development must look to enhance local employment and added-value allied local fisheries communities' wealth creation.

Summary and conclusion

RSSLA members have generations of experience and commercial mixed fisheries investment to draw upon. Within our proposal entitled **Strategy for the sustainable development of north-west Highland coastal fisheries and associated dependent communities** we have sought to bring this wisdom to bear in an attempt to move away from the currently pervading monologue of self-righteous single agenda (be it blatant self-interest or naive and disingenuous self-styled 'fishery' interest linked to fanciful and fashionable conservationism) towards an enlightened and progressive interaction between all interested and contributing stakeholders. Any and all controlling and influencing science within our fishery must be evidence based, continuously monitored and assessed, and above all balanced, proportional and appropriate to the enhancement of both fishery stock and the wider fisheries communities sustainability. We seek to re-examine all current inhibitions and local and seasonal prohibitions with that primary focus and not for mobile sector territorial advantage. We also recognise that commercial fishing interests are not as pre-eminent as they once were and that compromise and support is needed to encourage additional much needed economic stimulus to the employment and wealth generating opportunities within our area; we simply seek to propose a range of governance and compliance measures that will enhance the well-being, vessel safety, and business ambitions of all competing stakeholders. Our members also recommend a more enlightened and interwoven approach to much needed infrastructure repair and development – an approach that will benefit the entire maritime community. Above all we seek to include and interact as opposed to exclude and ring-fence. We are unashamedly ambitious for the enhancement of opportunity and wellbeing that a thriving mixed fishery will provide for us and future generations and submit our proposal accordingly and in this spirit.

Our membership is in equal measure tired and frustrated by the wasted energy and time expended upon factional bickering within commercial fisheries and the suspicion and mistrust fostered through the ignorance of each other's priorities and objectives; similarly with other stakeholders, policymakers and perceived inhibiting factions. We must have foreseeable business stability and catch opportunity to make the vital investment decisions needed for our businesses to thrive. This fishery is in urgent need of reinvigoration.

The Marine (Scotland) Act 2010 outlined a pathway of opportunity and transparency of purpose contained within a range of competing marine and maritime sectoral stakeholder interests. The Act outlined an ambitious strategy of localised but regionally overseen forums and agencies fostering cooperation and mutual sectoral interest and development. Our members urgently seek a return to the ethos of the Act, and encourage Marine Scotland and all interested and involved agencies to embrace our member's drive and enthusiasm towards the enhanced prosperity of all north-west Highland fishing communities.

RSSLA invites the considered and constructive response of all stakeholders.