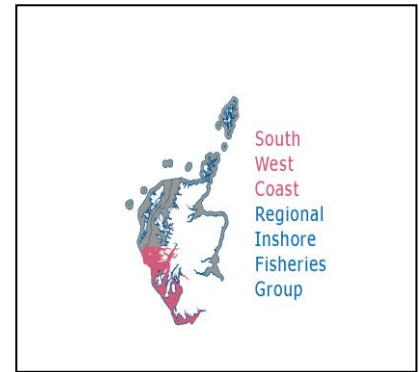


Jim Watson, Head of Inshore Fisheries,
Marine Directorate,
Victoria Quay,
Leith
Edinburgh



9th April 2025

Dear Jim,

Thank you for the opportunity to have our views on your Review of Interim Measures included in your process.

This RIFG has solicited skippers views via a National Creel Boat Survey, the results of which were presented to you on 5th March at your event in Edinburgh.

The comments in this letter refer to the South West Coast RIFG area with the exception of the Solway Firth where you are currently undertaking separate stock assessment work.

At your meeting of 24th October 2023 you were presented with what then was the most up to date stock assessment data on crab and lobster stocks. Notes from that meeting confirm that the primary concern was for crab stocks, with lobster stocks being in a less critical position. While I welcome the desire to protect vulnerable crab stocks, in the south west your Interim Measures appear to have disproportionately affected healthy lobster fisheries, raising questions about whether they are achieving their desired outcomes.

The industry here would welcome a separation of regulations affecting each species, therefore allowing for a more targeted and proportionate approach.

The restrictions placed on the largest creel boats have been welcomed as there is appreciation of the protection given to smaller vessels. Keeping larger vessels outside 6nm results in inshore fishing areas that cannot be emptied by the intensive methods used by "supercrabbers." These measures, however, are not effective. Visiting vessels and newly built vessels seem able to flout these restrictions. We would welcome a revision to the definition of the vessels to which that restriction applies in order to preserve inshore stocks.

At your seminar on 5th March 2025 you heard in detail evidence of the commercial impact of the interim measures on the lobster fishery here. They are affecting the economic and financial viability of fishing businesses and contributing to potential business failures and/or an accelerated contraction in the size of the fleet.

The anecdotal evidence that you heard on 5th March is not out of step with the views expressed in the National Creel Boat Survey. These confirm that, while landings remain stable, the effort put in to achieve these landings has risen. As discards increase it is incumbent on fishing businesses to deploy more gear and put in longer hours to achieve the same landings. A consequence of that is increased effort- reflecting in a higher cost per unit landed. There is a corresponding reduction in margins and viability in small enterprises that are already stretched by external forces.

These outcomes are at odds with your National Marine Plan and other policy documents which make reference to supporting the marine economy especially in an area such as the south west which is characterised by fragile rural coastal communities from Whithorn to Tobermory.

The industry here, in a spirit of -co-operation, would like to work with you, bringing to the table an industry perspective that may assist you to refine these measures, while side stepping any unintended commercial consequences. The Clyde is one of only two areas in Scotland to have introduced a voluntary pilot creel limitation scheme. This scheme closes in September 2025. It's continuation, after revision, would provide an opportunity to retain or introduce local measures targeted at any areas of concern highlighted by your Science function. It is also a scheme that has dealt directly with the issue about which most skippers are concerned- the number of creels in the sea.

Here in the south west we would seek to move away from a system characterised by a blanket ban, replacing it with an introduction of targeted, species-specific measures, phased in over time. Such an approach would allow skippers time and advance knowledge to adapt their business model to known future changes in the regulatory environment. This would help them plan future investment and consider diversification options in a measured way as opposed to reacting to sudden changes in regulations.

Once again, on behalf of the industry here in the south west, I thank you for the opportunity to have our voiced heard on this matter.

Kind regards,

Yours sincerely,



Alastair Hamilton, Chair