Inshore Fisheries Management Improvement (IFMI)

Call for Evidence - Analysis Report

June 2025

Scottish Government
Riaghaltas na h-Alba

Contents

Executive Summary

The Scottish Government held a Call for Evidence from 26 November 2024 to 18 February 2025 to gather the expert input needed to inform development of the Inshore Fisheries Management Improvement (IFMI) Programme. This landmark policy seeks to transition inshore fisheries management to a more agile model with co-management at its heart. Our vision is that this framework will enable us to tailor a wider range of management tools to better manage inshore fisheries for the changing needs of our marine environment and fishers, based on the best available scientific data.

In total 100 responses were received from 52 individuals and 48 organisations. They represented views from around Scotland as well as from national respondents.

A number of key points came through during the course of analysing responses to this Call for Evidence:

- The majority of respondents supported a regional approach to inshore fisheries management in Scotland.

- The most common preferred delineation to be used for managing Scotland's inshore fisheries was the Scottish Marine Region.

- There was significant support for an improved model of co-management in Scotland, however views on what this should look like differed significantly between respondents.

- A range of views were received about our existing Regional Inshore Fisheries Group (RIFG) network; these mirrored responses already received during our recent review of the RIFG network which have subsequently been considered and acted upon.

- A number of respondents repeatedly outlined the value in best available data to inform decision making, the need for greater transparency, and the need for appropriate resource to support delivery of an improved inshore fisheries management model.

- The theme of creel limits, and a need for them in the future, was prevalent in responses to a number of the questions.

- Views were often polarised depending on the background of the respondent.

This report summarises views outlined within responses to the Call for Evidence, with a view to informing the development of a new framework for managing inshore fisheries in Scotland. It is not necessarily representative of the views of all with an interest in the management of Scotland's inshore fisheries, nor does it seek to respond to any of the views submitted.

Introduction – About the Call for Evidence

Background

The IFMI Programme was developed in 2024 partly in response to stock assessment advice and stakeholder concern, highlighting sustainability issues with Scotland's crab and lobster stocks. In addition, a number of our key stakeholders representing a range of views had voiced a desire to move away from the existing national approach to inshore fisheries management. The programme seeks to consider available management mechanisms to improve the sustainability of these and Scotland's other inshore fisheries.

A selection of interim management measures were developed to respond to pressure on these specific stocks following initial engagement with our Fisheries Management and Conservation (FMAC) Inshore Subgroup in 2024. The exercise to develop these however highlighted that most management options would benefit from some form of regional variation, something that the current management framework is not well placed to deliver.

Scotland's inshore fisheries are primarily managed through the UK Fishing Licence framework alongside other mechanisms to deliver a suite of technical measures such as Minimum Landing Size, gear restrictions, and quota allocations. However, structures to develop, implement and enforce regional variation in measures are currently somewhat limited.

A regional approach to management has also been called for in evidence given by stakeholders to the Rural Affairs and Islands (RAI) Committee in the Scottish Parliament during recent committee sessions[1][2][3]. The RAI Committee evidence reinforced that a more discrete, localised approach to fisheries management carries many benefits. The Scottish Government is therefore keen to explore how a new framework for inshore fisheries management would support the delivery of Scotland's Fisheries Management Strategy along with wider objectives and commitments. Stakeholders have expressed their support for this approach.

Parallel to this Call for Evidence, we have been reviewing other work streams related to inshore fisheries management. This has included a recent review of our Regional Inshore Fisheries Group (RIFG) network[4], as well as FMAC and the FMAC Inshore Subgroup. These reviews have now been published and alterations have subsequently been made to each of these stakeholder engagement channels to improve their effectiveness. They will be further considered alongside wider objectives, priorities and requirements of the Scottish Government (e.g. Scottish Government's Programme for Government 2024-25, National Marine Plan including Regional Marine Planning, The Fisheries Act 2020, etc.) as we develop a new

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[1] Rural Affairs, Islands and Natural Environment Committee 27th Meeting, 2022 | Scottish Parliament Website

[2] Rural Affairs and Islands Committee 20th Meeting, 2024 | Scottish Parliament Website

[3] Rural Affairs and Islands Committee 27th Meeting, 2024 | Scottish Parliament Website

[4] 2024 review - Regional Inshore Fisheries Group: evaluation - gov.scot

framework for managing our inshore fisheries to ensure structures are complementary and appropriate connections made. We also brought in Interim Measures for crab and lobster on 12 May 2024 to provide some relief for these fisheries whilst wider work is underway to develop a new inshore management framework. These have recently been reviewed and amended to ensure they achieve the right balance of environmental and economic factors and are consistent with our obligations under the UK Fisheries Act 2020.

Our Fisheries Management Strategy outlines our commitment to working with stakeholders, and this framework offers an opportunity to strengthen existing arrangements. The IFMI programme will consider a structure that enables a greater focus on strategic decision making both regionally and nationally, in a way that enables each to complement the other. It will help us to manage fishing activity within the space available, and consider how responsibility for management and delivery can be shared whilst respecting the ultimate accountability of Scottish Ministers to the Scottish Parliament and the general public.

Aims of the Call for Evidence

The aim of this Call for Evidence was to gather the necessary expertise to inform the development of an improved inshore fisheries management framework in Scotland.

Discussions with our FMAC Inshore Subgroup and network of Regional Inshore Fisheries Groups (RIFGs), as well as broader engagement, highlighted the complexity and diversity of views relating to future inshore fisheries management. It was recognised that this diversity of views could not be gathered through FMAC and the RIFGs alone; we therefore sought to facilitate input from other relevant experts in the topic. Issues raised by the FMAC inshore subgroup informed the drafting of this Call for Evidence, which sought input from people with expert knowledge of inshore fisheries in Scotland (e.g. academics, fishers, national and regional fisheries representatives, eNGOs, seafood processors, coastal communities). We anticipated input to range from papers and data to relaying of personal experience and expert opinion to inform development of this policy.

Our vision is that this framework will enable us to tailor a wider range of fisheries management tools to the changing needs of our marine environment and fishers, on a regional basis, using the best available scientific data.

Details of the Call for Evidence

The Call for Evidence was open for a twelve-week period, from 26 November 2024 to 18 February 2025. Respondents were invited to answer 14 questions, which were broken down as follows:

- Part 1 - You and Your Business (questions 1 & 2)
- Part 2 - Current inshore fisheries management in Scotland (questions 3 & 4)

- Part 3: What Does Successful Inshore Fisheries Management Look Like? (questions 5, 6 & 7)
- Part 4 – Regional inshore fisheries management (questions 8, 9, 10, 11 & 12)
- Part 5 – Governance & Co-management (questions 13 & 14)

The majority of the questions were open questions to give us the qualitative information that we require to develop this framework, however questions 1, 2 and 8 were closed. Questions one and two were multiple choice, and 8 offered a Likert scale (a scale from strongly favour to strongly oppose that allows respondents to express their level of agreement with a statement) to gauge support for a regional approach to Scotland's inshore fisheries management. Question 10 combined multiple choice with an open text opportunity enabling respondents to explain their answer.

A number of acronyms have been used throughout the drafting of this report. For ease of reading, these can be found within Annex A which provides a Glossary of terms.

In some cases, respondents submitted data and other evidence sources to support their response. These have not been described within this report which specifically seeks to report on the responses to the Call for Evidence. They will however be considered in parallel to this report as the IFMI framework is developed.

Analysis methodology

This report provides a thematic analysis of responses to the Call for Evidence, where each question was reviewed in turn, with every response read and then key themes within these responses identified. The analysis and reporting was done in house by analysts from the Marine Analytical Unit in Marine Directorate and followed social research standards and protocols ensuring objectivity, impartiality and robust analysis. Due to the number of respondents, and volume of information provided, it is not practical for every response to every question to be detailed in this report. Some respondents provided very detailed responses, which were considered in this analysis, but individual responses are not detailed in full in this report. Full responses to the Call for Evidence, where publication permission was granted, can be found on [Citizen Space](#).

Where appropriate, quotes from respondents are included in the report to illustrate key points or provide examples. Only quotes from respondents who agreed to have their responses published are included in this report. Effort has been made to ensure that quotes represent balance across a range of stakeholder groups and views, and no more than two quotes are provided from individual respondents.

As described previously, most of the data collected in this Call for Evidence was qualitative. Qualitative analysis of open-ended questions such as many were in this Call for Evidence does not permit the quantification of findings. However, to aid the reader when interpreting the findings, a methodology is used to convey the frequency of which themes were identified in the written responses:

A majority of respondents refers to more than 51 respondents.

A common theme is raised by 25 or more respondents.

Several respondents refers to 15 to 24 respondents.

Some respondents refers to 6 to 14 respondents.

A small number of respondents refers to 2 to 5 respondents.

One respondent refers to the response of 1 respondent.

This approach is only used to present the prevalence of themes within responses to the Call for Evidence. It does not necessarily represent the importance of a theme.

The themes which were identified most frequently for each research question are presented in this report allowing a range of views to be detailed. Themes with four or more responses are detailed in text and often broken down into sub-themes. These sub-themes are sometimes only raised by singular respondents, but are mentioned due to the prevalence of the wider theme. Themes with two or three responses are presented in an 'other' section, and themes mentioned by only one respondent were not included in this summary report. This use of this approach was slightly different for the analysis of questions 8, 10, 11 and 12, where a smaller number of explanations meant that themes with two or three responses were detailed to offer some insight to views. For these questions, the approach used is detailed at the beginning of the summary of responses for each research question.

Quantitative analysis is provided for questions 8 and 10, where response options were provided to the respondents.

We ask readers to keep in mind the below considerations when reading this report:

- A Call for Evidence openly invites anyone with 'expert knowledge' of inshore fisheries in Scotland to submit a response. Therefore, individuals and organisations who are more interested or knowledgeable in the topic are more likely to have responded than those who do not have this interest or knowledge. Respondents are self-selecting and therefore this analysis does not necessarily represent the views of the entire population of Scotland, or of everyone with an interest in this topic.

- In some cases responses were received to one question but aligned better with a different question; these responses were considered when reviewing the most relevant question based on the analyst's best judgement.

- All responses are given an equal weighting throughout this report. This means that we recognise that a response of an individual has the same weight as a response from an organisation which may represent many members.

- The number of respondents for each question may not match the total number of respondents to the Call for Evidence. This is because not every respondent responded to every question.

Part 1: You and Your Business

In total, 100 written responses were received to the Call for Evidence. Most responses were submitted to Citizen Space, the Scottish Government's online platform for public consultation, although some responses were also received via email. These responses were reviewed by the research team and uploaded to Citizen Space.

Of those who responded to the Call for Evidence, 52 individuals and 48 organisations submitted responses. Eight respondents submitted their response as part of a campaign, although respondents were able to edit their response and consequently these responses are analysed as any other individual respondent.

Question 1: What is your role in relation to the commercial inshore fisheries sector in Scotland?

Respondents were given the choice of options outlined within Table 1 when answering this question. Please note that some respondents stated that they held more than one role, hence the total number of respondents in Table 1 being more than the 100 respondents who responded to the Call for Evidence.

Table 1. Respondents' role in the commercial inshore fisheries sector

Role	Number of respondents	Percent %
Science & academia	7	6.25
Inshore commercial fisher	27	24.11
National fishers' representative	5	4.46
Regional fishers' representative	8	7.14
Seafood processing / other ancillary seafood sector	5	4.46
Coastal community group	11	9.82
Environmental Non-Governmental Organisation (eNGO)	13	11.61
Public sector	5	4.46
Other (For example, hobby fisher)	34	30.36
TOTAL	**115**	**100**

Question 2: Of the six Regional Inshore Fisheries Groups, which one are you most closely associated with geographically?

Respondents were given the choice of options outlined within Table 2 when answering this question. Respondents also provided information on which Regional Inshore Fisheries Group they were most closely associated with geographically (table 2). Of those who responded, 26 (over a quarter of respondents) were not associated with a geographic region (e.g. they were a national body). The region

with the highest number of respondents was the South West Coast (23), with the lowest number of respondents from Shetland (3) and Orkney (5).

Table 2. Geographic area in relation to Regional Inshore Fisheries Groups.

Region	Number of respondents
None (i.e. a national body)	26
Shetland	3
Outer Hebrides - from the baseline between the Butt of Lewis and Barra Head, as well as the sea out from St Kilda, the Flannan Isles, North Rona and Sula Sgeir.	11
North West Coast - Cape Wrath in the north to Ardnamurchan Point, including the Inner Hebrides north of Ardnamurchan.	16
South West Coast - Ardnamurchan Point to the national border with England in the Solway Firth, including Inner Hebrides south of Ardnamurchan.	23
North and East Coast - Durness on the north coast and all of the east coast down to Burnmouth close to the border with England.	16
Orkney - Orkney, extending out to 12 miles around the isles and the waters surrounding Sule Skerry to the west.	5
Total	**100**

Part 2: Current Inshore Fisheries Management in Scotland

Question 3: What works well with the current national approach to inshore fisheries management in Scotland?

88 respondents provided details of what they think is working well with the current national approach to inshore fisheries management in Scotland. Some respondents stated outright that they believed that the national approach to inshore fisheries management works well within their answers, alongside supplementary information about what specifically works well. Where respondents provided context on what is not working well within this question, this is instead analysed as part of question 2. Fisheries management measures are discussed first, followed by stakeholder engagement mechanisms and then topics focussed on a broader context.

Fisheries management measures

Vessel monitoring technology

A common theme raised by respondents was the introduction of vessel monitoring technology, often referring to remote electronic monitoring (REM) of scallop dredgers. Some respondents felt that scallop REM has resulted in increased compliance and much fewer instances of illegal fishing. One respondent thought that this is helping to improve transparency whilst another commented that data should be used to support stock assessments. A small number of respondents felt that expanding vessel monitoring technology to the pelagic fleet or the under 12m fleet is a positive step to improving sustainability. One respondent felt this should be rolled out further, with another commenting that future roll out is expected.

Sandeel Fishery Ban

Some respondents were positive about the sandeel fishery ban as a measure which has worked well, with some remarking that it is a significant step forward. A small number of respondents reflected than the ban was helping to protect seabirds whilst one respondent felt that it safeguards fisheries and delivers on ecosystem objectives.

Ban on Berried Crab and Lobster Hens

Some respondents thought that the ban on berried crab and lobster hens has worked well. One respondent thought that this was an agile and long overdue measure, with one respondent stating they have noticed an increase in hen size as a result.

Outer Hebrides Creel Limitation Pilot

Some respondents were positive about the Outer Hebrides Creel Limitation Pilot, stating that it worked well and respondents have seen benefits from it. A small number of respondents felt that it resulted in improved catch per effort, financial gains and less gear conflict. A small number of respondents mentioned the tracking

device used to monitor the pilot, with a small number of respondents stating that it provides an example of positive co-management. A small number of respondents stated that they wanted the Pilot to be reintroduced permanently. One respondent thought that this approach worked because it was a local approach to an issue. A small number of respondents thought that the scheme should be expanded across the west coast/ Scotland. One respondent summarised the positives of this Pilot:

> "The introduction of a pot limitation scheme, again with fishers' support, is another example of positive co-management of fishery assets. Fishers also worked with St. Andrews University to produce a cheap tracking device which has surpassed all expectations. The reduction in pot numbers also appears to have improved catch per unit effort and enhanced the size and quality of Nephrops caught."

Minimum Landing Sizes

Some respondents felt that increases in Minimum Landing Sizes is an example of what has worked well with a national approach to inshore fisheries management. A small number of respondents felt they have noticed fish stocks improve and one respondent remarked on noticing an increase in the number of juveniles.

Electrofishing for razor clams scientific trial

A small number of respondents raised the razor clam scientific trial as being a good example of successful fisheries management. A small number of respondents felt that it requires fishers to commit to their legal responsibilities and felt it was positive that there is no scope for breaching of permits. A small number of respondents felt the tracking system used as a good example of work, and a small number felt it was positive that stock assessment work is required of participants. One respondent was supportive of the range of permissions needed to catch and sell razor clams.

Management in the Shetland Islands

A small number of respondents were supportive of the work that has been undertaken in Shetland, through the Shetland Islands Regulating Order and the Shetland Shellfish Management Organisations (SSMO). A small number of respondents thought that the system has had a positive impact and is working well. According to a small number of respondents, scallop, brown crab, lobster and whelk populations are doing well in the area, in some instances in better condition than elsewhere in Scotland. One respondent was supportive of the ability of the SSMO to commission additional data collection, which they felt helps support stock evaluations and certification. One respondent thought that the Shetland system should not be changed.

Stakeholder engagement mechanisms

Stakeholder engagement

Some respondents felt that stakeholder engagement and consultation is working well. A small number of respondents felt that there has recently been more effort to consult with a wide range of stakeholders, including coastal communities. A small number of respondents felt that this Call for Evidence displays an example of good

communication and consultation regarding inshore management. One respondent felt that there is success when the fishing industry is engaged, with another highlighting that cross-sectoral discussions are beneficial. One respondent felt that public consultations are working well whilst another welcomed the opportunities presented to them to have face-to-face discussions.

RIFGs

Some respondents provided positive comments about RIFGs. A small number of respondents felt that RIFGs are useful for helping to discuss and identify local issues, which can then inform the Marine Directorate of the Scottish Government. A small number of respondents felt that RIFGs help to bring fishers together and leads to greater collaboration. One respondent felt positively about the Marine Directorate's management of RIFGs with another praising the Shetland RIFG. One respondent felt that RIFGs enable fishers to have a direct point of contact with the Marine Directorate or with other fishers. One respondent felt that RIFGs have good potential.

FMAC & FMAC Inshore Subgroup

Some respondents provided positive comments about the Inshore Fisheries Management And Conservation (IFMAC) Group, now known as the FMAC Inshore Subgroup. A small number of respondents raised the view that it is a positive thing to have a forum such as the FMAC Inshore Subgroup where stakeholders are brought together for focussed co-management, with a small number of respondents highlighting that these forums are good places to discuss challenges and opportunities. One respondent raised the view that FMAC works well when it is based on fisheries topics, whilst another felt that FMAC does a good job of recognising that there are more interests than just those based on fisheries. One respondent positively noted the range of stakeholders involved in FMAC and another felt that FMAC enables engagement.

Broader context

Marine Protected Areas (MPAs)

A common theme raised by participants was comments related to Marine Protected Areas (MPAs), with positive comments made regarding MPAs that have fisheries management measures in place (e.g. restrictions on bottom towed fishing gear). Several respondents felt that there have been signs of recovery in places where MPA management measures are in place, with increased biodiversity and abundance. A small number of respondents felt the benefits that MPA measures give to low impact fishing. Some specific examples of areas where marine protection is successfully occurring were mentioned by a small number of respondents included the South Arran MPA and the Wester Ross MPA. A small number of respondents mentioned economic benefits that can result from MPAs with fisheries management measures in place, like more jobs, increased value of fish landings, supporting ports and providing benefits to the community. One respondent felt that the development of fisheries management measures for offshore MPAs is a positive thing, with one

respondent highlighting that the introduction of MPAs is positive as it shows action is being taken to protect the environment.

Licensing

Some respondents were supportive of the use of vessel licensing in inshore fisheries management. A small number of respondents felt that licensing works well, with a small number mentioning that the ability of licenses to be enacted and varied at pace has been effective. One respondent felt that licensing has great potential for managing fisheries.

Future Fisheries Management Strategy

Some respondents identified the Future Fisheries Management Strategy as something that works well in inshore fisheries management. A small number of respondents felt that the Strategy provides a useful framework for fisheries management with others stating that it shows ambition. One respondent outlined support for the stakeholder participation and co-development approach to creating the Strategy, with another supporting the ecosystem-based approach of the plan and its alignment with the Blue Economy Vision.

National approach to enforcement

A small number of respondents thought that approaching inshore fisheries management nationally allows for rules to be kept fair for all fishers. One respondent felt that it is easier to enforce rules when they are the same nationally. One respondent thought that a national approach is better for boats that move between areas.

Scottish Government and Scottish Parliament

Some respondents made positive comments about Scottish Government and Scottish Parliament staff, with a small number of respondents specifically praising Marine Directorate staff (including policy, science and local fishery office staff) for always being willing to meet and praising their effort. A small number of respondents were positive about the Scottish Parliament for running events such as the Our Seas Coalition event in January 2025.

Legislation and frameworks

A small number of respondents recognised that the legislation and frameworks already in place to support inshore fisheries management can enact positive change and lead to a sustainable future. The UK Fisheries Act 2020; Marine and Coastal Access Act (2009); Marine (Scotland) Act 2010 and UK Marine Strategy Regulations were examples given of positive legislation and frameworks by a small number of respondents.

Resources

A small number of respondents reflected that some areas of resourcing for inshore fisheries management are working well. A small number of respondents thought that the amount of resource used for staffing (e.g. policy teams, scientists and local fisheries officers) are benefitting inshore fisheries management. A small number of

respondents also thought that the support fishers received during the COVID-19 pandemic was helpful, and that other funding schemes have worked well.

Other

A variety of other areas that work well were identified by a small number of respondents. These include the emergency measure to protect flapper skate; maximum scallop dredge bar length; management of the wrasse fishery; running of pilot projects; introduction of seasonal closures; use of interim measures; recognising the importance of fishing communities; and fair treatment of fishers.

Question 4: What does not work well with the current national approach to inshore fisheries management in Scotland and needs to be improved?

A total of 97 respondents provided details of what they think is not working well with the national approach to inshore fisheries management in Scotland. Some respondents outlined that they felt nothing works well with current approach. In some cases they, and others, provided more detailed feedback on what they feel doesn't work well. These have been described under some broad headings for ease; wider marine environment, fisheries management measures, stakeholder engagement mechanisms and then topics focussed on a wider context. A number of the themes mirror those outlined in the previous question; sometimes due to opposing views, and sometimes highlighting a slightly different aspect of that theme that respondents felt were not working well.

Wider marine environment

Impacts of trawling and dredging

A common theme mentioned by respondents was that management of trawling and dredging is not working well in the national approach to inshore fisheries management in Scotland. A common theme mentioned by participants was that trawling and dredging is damaging the environment, damaging the seabed, impacting marine biodiversity and harming habitats, with current trawling and dredging activity not within environmental limits. One respondent stated:

> "It is alarming that scientific and fisheries monitoring evidence shows that trawl and dredge fishing are not currently operating within environmental limits. This must be urgently addressed to prevent further harm to marine ecosystems."

Some respondents felt that management of the marine environment is biased towards the benefit of commercial trawling interests, rather than for national, environmental and social interests. One respondent stated:

> "Scotland's inshore is a public asset that should be managed in a way that is transparently in the national interest, which is not the

same as the interests of the commercial trawl industry. We critique the 'current national approach' on the basis that it appears to be primarily driven by the demands of the commercial trawl sector rather than the national interest."

Some respondents raised the view that areas should have greater protection from trawling and dredging, including that MPAs should be better protected from trawling activity. A small number of respondents raised their view that there is limited monitoring or regulation of trawl and dredge activity even where it is banned in MPAs. Additionally, some respondents felt that inshore trawling and dredging should be banned, and that the 3 nautical mile limit should be reintroduced. One respondent stated:

"The extent of damage caused by bottom towed gear to seabed habitats means that there is an urgent imperative for the introduction of a ban on the use of all bottom towed gear in all Scottish MPAs (inshore and offshore) and in all waters within 3 nautical miles of the coast where nature and low-impact fishers should take precedent. Bottom trawling and dredging are simply not compatible with effective marine protection."

A small number of respondents raised specific concerns about bycatch associated with trawl and dredge, highlighting that this can stop populations of marine species from developing, and can lead to the destruction of spawning sites. A small number of respondents raised the view that damage to the seabed releases carbon dioxide into the atmosphere, damaging blue carbon stocks. A small number of respondents raised the view that by allowing trawling and dredging, environmental policy and legal commitments are not being met. A small number of respondents felt that trawling and dredging are leading to economic loss. One respondent raised the view that there has been a failure to distinguish between fishing methods and their impacts, whilst another raised the view that there has been a failure to abolish dredging and other destructive fishing techniques.

Management within Marine Protected Areas

Although support for Scotland's MPA network was a common theme within the previous question, criticism of the management of Scotland's MPAs was a common theme within question four. Several respondents raised the view that there have been significant delays to the introduction of fisheries management measures in most MPAs, and felt that these are still not in place in most MPAs. Some respondents raised the view that MPAs are not being adequately protected, with either no protections in place or protections not going far enough and therefore activities that damage the marine area are still being allowed. A small number of respondents also raised the view that MPA management measures are not sufficiently policed, with reported poor compliance and enforcement. One respondent held the view that there are:

"Very poor levels of compliance of commercial fishing vessels in or around MPAs where there are management measures in place… [redacted] members have noted VMS systems being turned off on

> scallop dredge fishing boats as they approach MPAs where dredging is banned."

One respondent felt that there are too few MPAs and that they are too small, leading to a patchwork of management. One respondent raised the view that current seasonal controls are not working. Another raised the view that the term 'Marine Protected Area' risks losing its meaning, because of the perceived lack of protection being provided to these areas.

Bycatch and entanglement

Some respondents raised concerns about the management of bycatch and entanglement. A small number of respondents felt that the Scottish Government is not effectively addressing bycatch and entanglement, including in MPAs. A small number of respondents felt that this is negatively affecting seabirds, marine mammals and non-target fish. A small number of respondents felt that Scotland is not meeting or making progress towards the bycatch regulations under the UK Fisheries Act 2020. One respondent felt that the Scottish Government needs to be more proactive in managing bycatch and entanglement.

Ecosystem approach

A small number of respondents raised the view that there has been a lack of ecosystem approach to managing inshore fisheries, with fisheries considered in isolation without consideration of other marine sectors or the environment. One respondent thought that the focus should be on protecting ecosystems rather than priority marine features as is the case at the moment.

Fisheries management measures

Vessel monitoring technology

Although support for the introduction of vessel monitoring technology was a common theme within question three, some respondents critiqued the rollout of vessel monitoring systems in response to question four, with the rollout of REM considered by some respondents to be inadequate and delayed. A small number of respondents felt that REM does not cover the whole fishing fleet, isn't used efficiently and doesn't go far enough. A small number of respondents felt that more needs to be done to maximise the use of REM to support enforcement and improve compliance.

A small number of respondents critiqued the data collected by tracking systems, with one respondent remarking that the resolution of VMS data is not good enough and one stating that there is overall a lack of spatial data. One respondent thought that all dredgers should have tracking on them and another thought that more should be done to use data to inform fisheries management. One respondent believed there has been an over-focus on using REM to support enforcement activities.

Creel numbers

Some respondents raised concerns about the number of creels being worked in the inshore area, with respondents highlighting that the quantity of creels used by individual fishers is increasing. Concerns raised by a small number of respondents

include this negatively impacting the creel fleet and being "out of control", with one respondent raising that this is leading to a lot of buoys in the sea and potential overfishing. One respondent also raised the view that the number of pots being discussed for pot limit schemes are too high.

Ban on Berried Crab and Lobster Hens

Despite some respondents stating that the ban on berried crab and lobster hens is working well in response to question three, other respondents have criticised it when responding to question four. A small number of respondents raised concerns about engagement and changing of rules, perceived to be without evidence, particularly related to the sudden exemption of the Solway Firth from the ban. Other concerns raised by singular respondents include: impacts of the ban on smaller vessels; unintended impacts on stock assessments; questions over what happens to female hens that berry in storage; different rules in different areas being unfair; and a perception that a national approach is not appropriate when stocks vary regionally.

Stakeholder engagement mechanisms

Engagement

Although some respondents felt that stakeholder engagement and consultation is working well in response to question three, a common theme raised by respondents in response to question four was that approaches to engagement are not going well in the current national approach to inshore fisheries management. Several respondents raised the view that a wider range of interests should be involved in discussions about inshore fisheries management, with several respondents raising that local communities (along with environmental interests, tourism and recreation) do not get a seat at the table, with too much of a weight on commercial fishers views. Some respondents thought that fishers themselves are not listened to, with some respondents raising that it is only the large-scale commercial sector who has a seat at the table. Some respondents feel that the large-scale mobile sector have their interests prioritised. A small number of respondents thought that voices representing fisheries interests should be given priority as they felt it was more important that fishers views are considered in fisheries management decisions over the views of others.

Some respondents felt that although there has been some effort to bring disparate voices of stakeholders together, such as through FMAC, that this has led to a lack of consensus and increased entrenchment of views. They felt this has led to delays and lack of progress.

A small number of respondents perceived consultations to be a waste of time and not an accurate reflection of stakeholders' views. They felt that they are either not acted on or led by pre-conceived ideas. A small number of respondents commented that consultations are often promised and then do not occur, or are not published (e.g. inshore MPAs). A small number of respondents thought that there are not enough face-to-face discussions with stakeholders. One respondent commented that a national approach to fisheries management makes engaging locally challenging. One respondent thought that there is a lack of feedback loop once views are

considered. One respondent felt that stakeholder feedback is not acted upon, with another commenting on poor stakeholder communication within the current model.

RIFGs

Whilst some respondents provided positive comments about RIFGs in question three, several respondents raised criticisms of RIFGs in response to question four. Some respondents outlined their perceived weaknesses of RIFGs, including poor chairing, a lack of balance and range of stakeholders, bias towards commercial mobile fishing, and a lack of transparency. One respondent felt that RIFGs lack knowledge whilst another thought they were a waste of time and money. Some respondents raised the view that RIFGs lack power or authority, and are seen to have no impact on national policy. Some felt they are not an example of successful co-management. A small number of respondents felt that RIFGs have failed to deliver regional management plans. A small number of respondents raised the view that RIFGs lack resourcing. One respondent raised concerns that the work of RIFGs often overlaps with that of associations, and another respondent felt that they thought the RIFG areas are too large.

Wider context

Environmental damage and decline

A common theme raised as something that is not working well with our current national approach shifting environmental baselines and decline in the condition of the environment and in the fishing industry. Several respondents raised the view that the health of marine ecosystems is in decline. Several respondents felt that biodiversity is declining (in the sea, and in seabirds), the health of the seabed and therefore carbon stocks is declining and that habitats (including benthic habitats) are damaged.

Some respondents raised the view that fish stocks are in decline, with many different species mentioned by participants, including Atlantic salmon, herring and commercial fish species in general. Some respondents explained the associated declines these are causing in the fishing industry. One respondent raised:

> "One creel fisherman recalled how he would barely get past Ulva lighthouse from Mull when he would need to turn back due to a full catch, whereas now productive creeling is difficult due to the sparse population."

Another felt:

> "The commercial fishery in the Clyde has seen an unprecedented collapse, with fishing boat numbers plummeting by approximately 80% in most harbours—and in some cases, by 100%. For example, in 2006, Girvan was home to 16+ local boats, the majority of them trawlers. By 2024, that number has dropped to zero."

Furthermore, some respondents felt the negative impact these declines are having on coastal communities and towns:

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> "All assessments highlight the losses and impacts occurring in the inshore marine environment. Aside from the losses to the commercial fishing industry, these impacts have affected many other people reliant on the health and productivity of the marine environment for business and recreation, e.g. loss of the once widespread and economically important recreational fishing activity in the Clyde marine region."

A small number of respondents felt that declines have led to shifting baselines, where people are no longer aware what a healthy marine ecosystem should look like, with a consequent need to look further back than 10-20 years ago to see what damage has been caused.

Delays to implementation

A common theme raised by respondents as something that is not working well in the management of inshore fisheries in Scotland is a lack of action as well as delays to policy implementation. Several respondents felt that various Acts, laws, policies and frameworks (e.g. Fisheries Act 2020; National Marine Plan; Marine (Scotland) Act 2010; Future Fisheries Management Strategy) are already in place and could aid inshore fisheries management in Scotland, but have failed to be implemented, are not being followed, or require clearer implementation plans and governance. One respondent felt:

> "Our inshore fisheries are not managed consistent with law and policy be that the Marine Strategy, the Sustainable Development Goals, the Marine Scotland Act."

Some respondents raised the view that policy goalposts are created but are often not fulfilled, or are delayed or postponed. One respondent felt:

> "Constantly disappointed by failed commitments - Ministers continually say they will do one thing, and then when the deadline comes, push it back two or even five years"

Some respondents listed commitments which they claim have yet to be achieved or implemented. These included Good Environmental Status; MPA management measures; reviving the Clyde; implementation of the National Marine Plan; widespread REM; regional marine planning; and assessment of wrasse populations. A small number of respondents felt that too much time is spent talking, and that change is not enacted urgently. Individual respondents felt that: there have been missed opportunities; research has not been acted upon; vessel license conditions have not been enacted with speed; decision-making conflicts with existing commitments; and that it appears the Scottish Government waits for a judicial review before action is taken.

Compliance and enforcement

Several respondents raised the view that compliance and enforcement of illegal fishing activity in inshore fisheries is not working well in Scotland. Some respondents raised the view that the penalties used are not a deterrent to illegal activity, that the

prosecution system is long-winded with loopholes, and that enforcement is not done effectively, potentially due to a lack of resourcing. Some respondents raised the view that there is inadequate monitoring and enforcement of fishing activities on sea and land, and that illegal fishing activities are not being caught or stopped, with monitoring (by staff on shore or at sea) often predictable and outdated. One respondent felt:

> "the fisheries patrol vessels are easy to identify and the trawler fishermen's network very quickly spreads the word about where the vessel e.g. the Minna usually is."

A small number of respondents raised the view that they believed compliance with fishing regulations is not good, numbers of fish can be falsified and gave examples of where they perceived illegal fishing to be occurring. Specifically referring to MPAs, a small number of respondents raised inadequate policing as a concern and thought there is poor compliance. A small number of respondents raised concerns about a lack of data and monitoring surrounding compliance. A small number of respondents raised issues with the regulations themselves, highlighting where some are unenforceable. A small number of respondents raised the view that enforcement is not occurring sufficiently to stop businesses (such as hotels and restaurants) buying illegally caught fish.

Lack of regional/local approach

Several respondents felt that the current national model does not work and in turn felt that a more regional approach is needed. Some respondents raised the view that the national approach is not working as fisheries are not suited to a 'one size fits all approach' and that regulations do not suit every area due to regional variations in the environment, fish species and fishing methods. A small number of respondents raised the view that national concerns are listened to over local or regional issues, leading to them being ignored. A small number of respondents raised the view that decisions are made by people who are distanced from the sea, and not aware of what is happening locally. A small number of respondents thought that there needs to be a greater devolution of power to local interests. One respondent thought that having a national approach stops local measures from being developed. One respondent felt that a national approach is not conducive to the objectives of recreational sea angling.

Data

Several respondents raised concerns that data and science are not working well to inform inshore fisheries management in Scotland. Several respondents felt there was a lack of data available to support decision-making and fisheries management, including data not being collected often enough, gaps in understanding, poor stock assessments, assessments occurring at the wrong time, lack of information about fishing activity, inadequate resourcing and delays in publication of findings. Some respondents were of the view that there is an overall lack of confidence in the data collected, with concerns about accuracy and neutrality reducing accountability. Some respondents raised the view that there should be better connections between fishers and data collection, with greater cooperation and use of fisher resource to improve

the data available. A small number of respondents raised concerns that decisions are not being informed by data, and that data is being collected and not used.

A small number of respondents raised the view that there is lack of transparency regarding data, and often a lack of access available to it. One respondent felt that there has been a lack of work into emerging fisheries and fish stocks, whilst another perceived that academics and universities are not used enough to support data collection and use.

Marine Spatial Planning

Several respondents raised the view that they do not believe marine spatial planning is working well in Scotland. Several respondents raised concerns about fishing being dealt with in isolation and without alignment to other sectors (and the wider ecosystem) that use the marine space, with particular concerns raised about the apparent exclusion of fisheries management from the National Marine Plan 2. Some respondents raised concerns about spatial management of fishing being avoided generally, with it felt by some respondents that there is an unwillingness to put in place an inshore limit. A small number of respondents raised concerns about the lack of progress towards regional marine plans. One respondent felt that overall we have not succeeded to spatially manage the seas.

Central management

Although some respondents had made positive remarks about the Scottish Government within their response to question three, some respondents outlined areas where they felt the Scottish Government would benefit from improvements in their responses to question four. Some respondents felt that leadership could be improved within the Marine Directorate. A small number of respondents felt that the Marine Directorate would benefit from increased resources, with one respondent feeling that allocation of resources could be improved. A small number of respondents felt that the Marine Directorate must improve on delivery of policy commitments and seek to remove any legislative loopholes. One respondent outlined multiple perceived issues affecting the Marine Directorate including the current decision making processes and how this incorporates stakeholder feedback and best available evidence. One respondent felt the Marine Directorate would benefit from improving stakeholder communication.

Licensing and quota system

Whilst some respondents had outlined their support for the use of vessel licensing in inshore fisheries management in response to question three, some respondents outlined issues with our existing vessel licensing and quota system in their responses to question four. A small number flagged concerns about non-licensed vessels operating commercially, and/or felt that the lack of control on unlicensed "hobby" fishers undermines efforts of the licensed fishing fleet. One respondent felt that a reform of the current vessel licensing system is needed, as they felt that monetisation of them has been detrimental to the inshore fleet and makes it difficult for new entrants to access industry. Another felt that the allocation of quota and other management measures, such as licence conditions, should be underpinned by environmental good practice and efforts to improve sustainability and incentivise

behaviour. On a similar theme, one respondent felt that a move to smaller boats with smaller and equal quotas would bring environmental benefits, placing more of the responsibility of protection on fishers from coastal communities. Finally, it was the view of one respondent that quotas are mismanaged across Scotland, with some fishers declaring landings across more vessels than are used to fish in a day.

Legislation

Whilst a small number of respondents recognised the positive change enacted by our existing legislation and frameworks within their responses to question three, a small number of participants cited issues with legislation when responding to question four. A small number of respondents felt issues relating to effort, partially that existing legislation does not provide effort control for creels. A small number of respondents felt that there are loopholes in legislation which makes it less effective for managing fisheries. Another felt that existing legislation to regulate effort by unlicensed "hobby" fishers is not being enforced. Finally one believed there is no legislation to require a minimum landing size for prawns. More widely on the theme of legislation, one respondent listed a number of legislative commitments that they do not feel are currently being met under the existing national model. Another felt that much more could be achieved using existing laws and policies, which they felt are currently underutilised.

Environmental organisations

A small number of respondents felt that the current nationwide model didn't work due to input from environmentalists. A small number felt that they have slowed progress on fisheries management issues due to their high volume of Freedom of Information/Environmental Information Requests, and court challenges. One respondent felt that existing fisheries management in MPAs was brought in place to appease the "green lobby". They felt that they were not justified by existing evidence and technology, and caused fishers to lose faith in the MPA engagement process. Another felt that their lobbying had resulted in a number of impractical proposals from the Scottish Government. One respondent felt that environmentalists use unsubstantiated anti-fishing industry information without validated scientific evidence to support their claims. Finally one respondent felt that inclusion of certain stakeholders within wider fisheries management prevents frank and honest conversations.

Resources

A small number of respondents mentioned resourcing issues in their answer. A small number raised concerns around Scottish Government resourcing and achievement of policy objectives. A small number felt that the Scottish Government don't currently make good use of non-financial resources such as research support from industry, and that improved collaboration going forward could make better use of resourcing opportunities. One respondent felt that that resource for science is currently weighted towards the offshore area, resulting in more kneejerk reactions to inshore issues, slower science and a weaker basis for making management decisions. Another felt that a lack of resource is the biggest challenge facing the inshore sector, feeling that there is insufficient resource to adequately monitor, assess and manage

the regional complexities of Scotland's inshore fisheries. One respondent stressed that increased resource is necessary for good science, monitoring and compliance. A similar theme was noted by another respondent who felt that additional resource is needed to support an effective scientific framework to better understand of non-quota stocks.

Issues with large vessels

A small number of respondents felt that boats with a bigger tonnage cause disproportionate damage to fishing grounds due to the size and weight of their gear as well as high frequency of fishing activity. It was the view of one respondent that there is not enough incentivisation of smaller, more sustainable fisheries. Another felt the move to larger vessels had resulted in fewer individuals benefiting from our commercial inshore fisheries.

Recreation

A small number of respondents felt that the current format fails to consider recreational fishers. Within these, a small number felt that recreational sea angling has not been represented within inshore marine management, feeling that fisheries management has prioritised damaging fishing methods over protection of marine ecosystem including recreational finfish fisheries. One respondent felt that Scotland no longer has a thriving sea angling industry due to poor catches, and another felt that the current lack of controls on unlicensed "hobby" fishers undermines efforts of the licensed fishing fleet.

Balance of interests

A small number of respondents felt that the current national structure failed to balance different stakeholder interests. A small number felt that the current model focuses too much on addressing the demands of commercial fishing industry and not enough on wider stakeholder interests. One respondent felt that the current model has allowed inshore fisheries to become dominated by bottom contact fisheries. Finally another felt that the current model enables some policies or consultations to become overtly politicised by some organisations.

Competition in the shared marine space

A small number of respondents outlined issues with high levels of competition within the shared marine space, whereby they felt fishing grounds are being reduced to accommodate other marine industries. One flagged that this is most significant in the inshore area where fishers are less able to fish elsewhere, with another stating that this is increasing incidences of gear entanglement. One respondent felt that the impacts of spatial squeeze on fishing grounds must be assessed, with another feeling that the impacts of the squeeze on the fishing industry needs to be mitigated in light of other expanding marine industries.

Other

A selection of other topics where things are not working well were identified by a small number of respondents. These include: impacts on blue carbon; aquaculture impacts; impacts on the Clyde; gear conflict; the electrofishing for razor clams

scientific trial; lack of three mile limit; lack of co-management; FMAC Inshore Subgroup and FMAC; Highly Protected Marine Areas (HPMAs); levels of uncertainty; difficulties in diversification; and pollution.

Part 3: What Does Successful Inshore Fisheries Management Look Like?

Question 5: What are the most important <u>economic</u> outcomes for inshore fisheries management, to you?

92 respondents provided details of economic outcomes they believed are important for inshore fisheries management. For ease, these are divided into fishing-related outcomes and broader outcomes.

Fishing-related outcomes

Lower impact, more sustainable fishing

A common theme raised by respondents was that more fishing should be low impact and sustainable as an economic outcome of inshore fisheries management, presumably to protect the fishery for future prosperity. Several respondents felt that fishing methods should be more local, with some respondents feeling that there should be more focus on small-scale local fishing boats to support the local economy. Some respondents felt that lower impact fishing methods (such as creeling or diving) can help to generate greater financial returns, employment and economic benefits than more intensive fishing methods. Some respondents also felt there is a need to use lower impact fishing methods to limit potential negative impacts, including on fish stocks and the environment.

It was the view of a small number of respondents that lower impact fishing methods should be given greater preference, with a small number of respondents also feeling that lower impact methods should be incentivised or rewarded. A small number of respondents thought that more research and effort should go into developing more low impact fishing gears, and that methods should result in less waste and be more selective. A small number of respondents criticised the use of dredging and trawling and called for high impact fishing methods to be restricted. One respondent also felt that static gear use should be regulated.

Healthy fish stocks

Similar to the previous theme, a common theme raised as an important economic outcome by respondents was healthy fish populations. Several respondents felt that the economic success of inshore fisheries depends on healthy fish stocks, and as a result these should be supported. Some respondents felt that unsustainable fishing effort, inadequate management and declining stocks has meant that fishing has declined in some areas.

Some respondents outlined an overall ambition of having improved and well managed fishery stocks, with others feeling that these stocks could provide a range of benefits to coastal communities (that are not just from fishing). A small number of respondents felt that improved fish stocks should lead to a strong fishery for the future.

Economically viable fishing businesses

Several respondents raised viability of fishing businesses as an important economic outcome of inshore fisheries management. Several respondents raised the view that fishing businesses should be economically viable, healthy, sustainable, secure, profitable and able to thrive and grow. A small number of respondents felt that fishers should be able to make a good living without harming the environment, or equally without fishers feeling the need to put themselves in danger to fish available grounds (e.g. during periods of inclement weather). A small number of respondents felt that fishers should be able to make a good living from working hard.

Access to markets

It was the view of some respondents that access to markets is an important economic outcome of inshore fisheries management. A small number of respondents felt that new, secure, and strong markets need to be established locally, nationally and internationally. One respondent felt that:

> "Market development is critical to building consumer confidence in eating beyond farmed salmon, cod, haddock and tinned tuna"

It was the view of a small number of respondents that prices, especially for shellfish, are very low and lagging behind rising costs. One respondent felt that producer organisations are driving low prices, whilst another thought that markets seem to be controlled by the low prices in French and Spanish markets. A small number of respondents felt that access to markets needed to be improved, with one respondent highlighting the importance of there being enough catch to support the infrastructure that enables for fishers to access markets (especially from islands). One respondent outlined that they felt there is a need for diverse employment so that coastal communities are resilient to market changes.

Equitable benefits

It was the view of some respondents that a more equitable share of benefits of the marine environment is an important economic outcome of inshore fisheries management. A small number of respondents felt that quotas should be distributed more equitably, which would help benefit the small-scale sector and lead to a fairer distribution of benefits for local businesses and families. A small number of respondents felt that a fairer distribution of access and benefits of the sea across coastal communities is needed, with benefits of marine spaces not just available for fishers.

Funding and incentives

A small number of respondents felt that funding and incentives to fish sustainably would be an important economic outcome of inshore fisheries management. It was the view of a small number of respondents that incentives could reward businesses that act sustainably, with one respondent highlighting:

> "Learning from agriculture we contend that rewarding those businesses which act most sustainably will create a ratcheting of improvements in inshore fisheries, leading to a positive economic return for the entire industry."

A small number of respondents felt that greater investment is needed to encourage new entrants to the fishing sector (e.g. through grant funding) whilst one respondent felt that funding should be available to help fishers move towards more sustainable fishing gear. Another suggested funding could help improve local fishing infrastructure.

Creel limits

It was the view of a small number of respondents that there is a need for creel limits, feeling that increased control on creel fishing effort would lead to greater economic sustainability.

Broader outcomes

Local economy and communities

A common theme raised by respondents was that an important economic outcome of inshore fisheries management would be a boost to the local economy and local communities. A common theme respondents identified was the outcome of having thriving local communities, who benefit economically and socially from inshore fisheries management, as such communities are often fragile. Some respondents felt that fishing can add value to local economies. One respondent felt that:

> "Well managed fisheries and fish stocks are intimately linked to the viability of our coastal communities"

Whilst another felt:

> "Much of this income percolates through some of the smallest, most remote... communities in Scotland, helping keep them sustainable and vibrant."

It was the view of some respondents that inshore fisheries management can boost local infrastructure and benefit local industries. Some respondents also felt that non-fishing industries such as tourism and recreational sea angling could benefit the local economy and this could be an important economic outcome of inshore fisheries management. One respondent felt that coexistence of different economic interests is good for the economy. A small number of respondents felt that an important economic outcome of inshore fisheries management would be to build community wealth, in line with the Scottish Government's Community Wealth Building agenda.

Employment

A common theme raised by respondents an economic outcome of inshore fisheries management was provision of employment opportunities. Some respondents felt that fishing should be able to support local jobs, which locals want to fulfil. Some respondents felt that fishing jobs should be of good quality and secure. Some respondents also mentioned that jobs specifically should be available for local new entrants and young people. Some respondents also suggested that fishing should support downstream jobs, e.g. in restaurants, processing, or boat service providers in local communities. A small number of respondents felt that there are not many other jobs available in island and coastal communities, and that fishing should be

able to provide employment in such areas. It was the view of a small number of respondents that non-fishing related employment should also be available in coastal communities and that this should be considered an important economic outcome.

Healthy marine environment

Several respondents felt that economic outcomes are inextricably linked to the health of the marine environment. It was the view of some respondents that the economic success of inshore fisheries and wealth of coastal communities depends on the health of fish populations, which are dependent on the health and wellbeing of the marine environment. It was therefore felt that the economy and environment need to be considered together. A small number of respondents felt that ecosystem services and natural capital in themselves provide economic benefits outside of fisheries. A small number of respondents felt that greater biodiversity arising from a healthier marine environment could benefit non-fishing businesses such as tourism operators.

Tourism and recreation

Several respondents raised the view that they think an important economic outcome of inshore fisheries management is the availability of recreational and tourism activities. The increased availability of recreational sea angling opportunities was raised by a small number of respondents, with a small number highlighting how these opportunities have declined as fish populations have reduced. It was their view that these used to provide considerable income to Scotland and local coastal economies. One respondent wished to see a recreational sea angling strategy to be created.

Some respondents felt that an important economic outcome of inshore fisheries management could be the provision of tourism opportunities, which could bring money into local economies. One respondent felt that some island communities are reliant on tourist income. One respondent felt that MPAs can attract tourists, with another highlighting that access to the marine environment for leisure needs to be ensured. One respondent felt that the coexistence of fishing and tourism would be an important economic outcome.

Seafood

Some respondents outlined economic outcomes relating to the provision of food. Some respondents felt that there should be local supply chains for seafood, with local sales and consumption locally leading to shorter routes to market and lower food miles. A small number of respondents felt that this would lead to increased food production and greater local food security. A small number of participants mentioned there should be campaigning to promote Scottish fish and encourage Scottish people to eat a greater range of fish. A small number of respondents felt that the production of good quality and sustainable seafood was an important economic outcome.

Spatial management

Some respondents felt a need for spatial management methods, such as marine protected areas or zonal management, to be put in place in order to limit types or extents of fishing in some areas.

Local decision-making

It was the view of some respondents that local decision-making and management of inshore fisheries was an important economic outcome. One respondent thought that decision-making should be devolved to local RIFGs, with another highlighting that local communities should get to make decisions.

Data

A small number of respondents outlined that they would like decision making to be informed by a greater volume of up-to-date and high quality data.

Other

A variety of other economic outcomes were identified by a small number of respondents. These include: improved fishing facilities and infrastructure; spatial management of fishing; all costs (including environmental and opportunity costs) being accounted for economically; ecosystem services; diversification options; all stakeholders having a say; labelling or accreditation of fish for consumers; fisher prominence in decision-making; seal control and confidence to invest.

Question 6: What are the most important <u>environmental</u> outcomes for inshore fisheries management, to you?

98 respondents identified what they consider to be the most important environmental outcomes of inshore fisheries management. For ease of understanding, these environmental outcomes identified are summarised under the following headings: wider environmental benefits; sustainable fisheries; decision-making, and wider pressures.

Wider ecosystem/environmental benefits

A healthy and recovered marine environment

A common theme raised by respondents as an important environmental outcome of inshore fisheries management was protection and recovery of the health of the marine environment. Having a marine environment and/or ecosystem that is healthy, restored, protected, resilient and thriving, with degradation reversed, was a common theme mentioned by respondents. An additional common theme raised was the environmental outcome of having a marine environment with greater biodiversity, including healthier fish populations, more diverse fish and shellfish, more seabirds and more marine mammals. Additionally, several respondents raised the view that they wanted habitats to be restored, regenerated and recovered, to support biodiversity. Recovery and protection of the seabed, benthic habitats, was also raised by several respondents. It was the view of a small number of respondents that ensuring marine waters are clean and healthy is an important environmental outcome. One respondent felt that respect for the marine environment should be ensured, whilst another felt that "protecting the marine environment is fundamental for survival of humanity."

Ecosystem-based approach

Several respondents felt that an important environmental outcome is to ensure an ecosystem-based approach is used when managing the marine environment. Some respondents raised the importance of ensuring that ecosystems are healthier, recovered and resilient. Some outlined their views around the importance of considering the intertwining effects of human activity and the environment. In particular they outlined impacts on fishing and different marine species, benefits and impacts, and broadly felt that consideration of the whole ecosystem is necessary. Some respondents felt specifically that fishing is part of an ecosystem, and that fisheries management should be ecosystem based. One respondent outlined how they feel an ecosystem approach is already being achieved in some work:

> "As an example of applying an ecosystem-based approach to management, we would note collaborative work NatureScot has undertaken with Marine Directorate SEDD in conjunction with Napier University in relation to herring spawning grounds. This work looks at the relationship of sustainable management of the species, the fishery and essential fish habitat within the context of the Marine Protected Area network and wider seas."

A small number of respondents felt that the seabed is an important foundation of marine ecosystems and therefore needs protection. One respondent raised a need for there to be ecosystem-based marine planning.

Waste, litter and pollution

A variety of topics related to waste, litter and pollution were brought up by several respondents. Some respondents felt that bycatch (of non-target or undersized fish, shellfish, bird, mammal species) should be minimised or eliminated altogether. A small number of respondents detailed approaches which could help achieve this, including sinking lines for creels, rope free potting, stopping trawl and dredging, using more selective gear, removing set nets and capping creel numbers. One respondent detailed that:

> "Ending ecosystem and food waste caused by bycatch and discarding. Demersal gears such as bottom trawls and dredges are considered to have a very high risk of bycatch and discarding. Bottom trawling has been found to have the highest level of bycatch of any form of fishing. The RAINE Committee heard that Nephrops trawlers catch approximately 100 tonnes of cod in bycatch in the Clyde. This equates to 2 million fish and a large proportion of the already depleted cod population in the Clyde. Scallop dredges also bycatch and fatally damage a range of non-target species and undersized. It has been estimated that for every scallop caught, four other species are killed or collected as bycatch"

A small number of respondents felt that marine pollution needs to be tackled, with litter from fishing and pollution from aquaculture both mentioned. One respondent referred to a need to reduce ghost fishing, with another highlighting a need to ensure

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better water quality. One respondent felt that the plastic used in fishing should be reduced, and if possible, a fishing plastic recycling scheme should be put in place.

Marine Protected Areas and spatial planning

Marine Protected Areas (MPAs) and the use of other spatial planning measures were raised by some respondents as an important environmental outcome of inshore fisheries management. A small number of respondents felt that stronger fisheries management measures within MPAs are needed, with some stating that trawling and dredging should be stopped entirely within MPAs. The use of marine spatial planning or zonal measures to identify areas for protection or to dedicate to fishing was outlined by a small number of respondents. A small number also raised examples of where MPAs or bans on fishing particular species in particular areas have been useful, including Lyme Bay, the South Arran Marine Protected Area and the Sand Eel ban on Wee Bankie. One respondent felt that HPMAs should be put in place, with another highlighting that putting more measures in MPAs in place could help Scotland meet the 30x30 target. One respondent felt that any spatial measures need to be properly justified, administered and agreed with fishers. Another respondent felt that the impacts of spatial planning should be considered on neighbouring areas.

Meeting legal obligations

It was the view of some respondents that Scotland meeting its national and international legal obligations – including the Nature Conservation (Scotland) Act 2004; OSPAR; Convention on Biological Diversity; UN Sustainability Goals; Good Environmental Status; UK Fisheries Act (2020); the Joint Fisheries Statement (2022) and the UK Marine Strategy – is an important environmental outcome of inshore fisheries management, with some not feeling that Scotland is currently meeting these obligations. A small number of respondents felt it was necessary for a clear pathway forward towards Good Environmental Status to be outlined.

Blue carbon

It was the view of some respondents that limiting release and destruction of blue carbon is an important environmental outcome of inshore fisheries management. A small number of respondents felt the need to ensure and encourage the storage of blue carbon by protecting important blue carbon habitats (e.g. the seabed/ seagrass) and enabling a healthy marine environment. A small number of respondents also outlined views that trawling releases blue carbon through damage to the seabed, and that this needs to be stopped.

Climate change

It was the view of some respondents that factors associated with climate change should be an important consideration of inshore fisheries management. A small number of respondents highlighted the need to adapt and be resilient to climate change, for instance due to changing fish stocks, and outlined that this may require flexibility. A small number of respondents felt that baselines have adjusted due to a changing climate, and that these should be considered when managing the environment. It was the view of one respondent that the oceans are fundamental when thinking about a changing climate.

Sustainable fisheries

Fish stocks

Maintaining and improving fish stocks was a common theme highlighted by respondents as an important environmental outcome of inshore fisheries management. Several respondents outlined the need to manage inshore fisheries sustainably to ensure that there are fish stocks available and a suitably managed marine environment for the long-term, for future generations. Some respondents outlined the importance of fish stocks recovering and being restored to historic healthy levels (beyond 10 years ago), with one respondent highlighting that they felt there is a need for policy to encourage recovery. A small number of respondents felt that fish stocks are declining and, in some instances, have been overfished. A small number of respondents outlined that they felt spawning and nursery habitats should be protected to support future fish stocks. One respondent felt that fish stocks should be managed appropriately. A selection of specific outcomes related to healthy fish stocks were outlined by one or two respondents, including: no areas being bare of stocks; stocks providing an economically sustainable harvest; more fish being caught with less effort; there being variety of stocks as well as numbers; and that fish stocks could support sea angling. One respondent felt the need to have clear definitions of sustainability.

Bottom trawling and dredging

Although this theme mirrors some of the comments raised in the previous section, it was common for respondents to specifically outline views about the need to minimise the negative impacts that trawling and dredging have on the marine environment. Several respondents felt that trawling and dredging are damaging and degrading to the marine environment, fish stocks (including impacts on spawning and fish nursery grounds and through bycatch), the seabed, and blue carbon. Some respondents felt that there should be spatial management of trawl and dredging activities, with reefs or nurseries/ spawning sites, sensitive or biodiverse areas, or MPAs protected from these activities.

Some respondents felt that there should be an overall ban of trawling and dredging, or all mobile gear, with some highlighting that trawling and dredging should be banned in inshore areas. One respondent felt that trawling and dredging should be banned within 3 miles of the coast. A small number of respondents specifically felt that not enough marine space is protected from trawling and dredging. A small number of respondents felt that trawling stops the recovery of fish stocks, with one respondent highlighting that:

> "…even during the short time in 2020-2021 that the Nephrops trawl fleets was tied up in the Firth of Clyde that there was an increase in the typical size of Clyde cod."

A small number of respondents thought there should be better management measures and enforcement of trawl and dredging, with one respondent feeling that trawling stops Scotland from meeting Good Environmental Status.

Balance in fisheries management

The need for balance in fisheries management was felt to be an important environmental outcome by some respondents. Some felt that there needs to be a balance between protecting the environment and maximising socio-economic benefits/ fisheries opportunities. One respondent felt:

> "Environmental outcomes must be balanced with economic and social outcomes. They must complement each other [rather] than one have more strength than the other. A balanced approach ensures that inshore fisheries can continue over the longer term without depleting fish stocks or harming the marine environment. When a balance is achieved it will produce livelihoods for generations."

A small number of respondents felt the need to have a balance of gear used in areas, with a small number of respondents also highlighting the need for a balanced approach to area closures:

> "Blanket closures on areas for the sake of the environment are simply not the answer, with areas suffering and becoming starfish deserts - Broad bay in Lewis being the prime example."

Low impact gear

Some respondents felt the need for more low impact fishing gear (such as diving/ creeling) to be used to enable sustainable fishing as an environmental outcome of inshore fisheries management. A small number of respondents felt that prioritising low impact fishing approaches (such as creeling) could lead to environmental and economic outcomes for local communities. One respondent felt that bycatch can be returned to the sea from creels, with another highlighting that we need to manage the impact of fishing gear to enable nature to recover. One other respondent felt that the Scottish Government should be doing more to support fishers to use low impact gear.

Lower carbon footprint of fishing boats

It was the view of a small number of respondents that a reduction in the carbon footprint of fishing was an important environmental outcome, with them feeling that more work is needed to explore low impact boats and gear, and different fuels used.

Pot limits

A small number of respondents felt that the introduction of a pot/ creel limits could help to aid the sustainability of fish stocks for the future, where currently high effort is perceived to be damaging stocks. One respondent felt that more research is needed to understand how to make a pot limiting system feasible.

Decision-making

Use of science and evidence

It was the view of some respondents that the use of science and evidence in decision-making as an important environmental outcome of inshore fisheries management. Some respondents felt that there is generally a need for more science in order to benefit fishing and the environment e.g. investigations into other commercial species; impacts of environmental changes; clearer plans; better monitoring/ data collection; faster publication; more habitat and biodiversity data; technology to map economic value; regular surveys. Some respondents also felt that it is important that decision-making is grounded in evidence, with a small number of respondents also highlighting that data needs to be robust, rigorous and up-to-date. A small number of respondents thought that science that uses fishers' knowledge should be collected, or that fishers should be involved in data collection. One respondent felt that Inshore Fisheries and Conservation Authorities (IFCAs) were a good example of how multiple different data sources can be used to evidence their decisions. IFCAs are the main mechanism of inshore co-management in England.

People as part of the environment

Some respondents felt an important environmental outcome would be the involvement and careful engagement of coastal communities and impacted stakeholders (including fishers) in management. A small number of respondents felt that people are part of the ecosystem, and any management of the environment would have an impact on coastal communities and they should therefore considered. One respondent felt that coastal communities can act as guardians to protect the marine environment.

Influence of environmental lobby

A small number of respondents raised concerns about the influence of environmental lobbying groups on decision-making. One respondent felt concern about the Scottish Government prioritising environmental concerns over socio-economic impacts.

Local approach

A small number of respondents felt there is a need to manage inshore fisheries with a local approach, including local voices, which can help to reflect the local marine context, and that this would itself be an important environmental outcome.

Wider pressures

Impacts of Offshore Renewable Developments

A small number of respondents felt that offshore wind farm developments can negatively impact fish habitats and species, and cause environmental changes that impact fishing, with a small number of respondents highlighting uncertainty and contradictory opinions on the long-term environmental impacts of renewables developments on marine spaces.

Other

A variety of other environmental outcomes were brought up by a small number of respondents. These include impacts of aquaculture, salmon/ trout management, an inshore limit, positive impacts of trawling, enforcement, extreme weather, seal management, working together and displacement.

Question 7: What are the most important <u>social</u> outcomes for inshore fisheries management, to you?

93 respondents provided answers to this question. For ease of understanding, these are divided into social outcomes on fishing and broader social outcomes.

Social outcomes on fishing

Sustainable fishing practices
A common theme mentioned by respondents was that they felt that fishing sustainably and using low impact methods was an important social outcome. Several respondents felt that it is socially important that fishing is sustainable for the future of the environment and of fish stocks long term. Several respondents also raised the need for fishing to be sustainable in order to support people, jobs and wider coastal communities. Several respondents felt that fishing needs to be low impact, using more static gear, smaller boats, encouraging individual harvesting and more sustainable fishing methods generally with less bycatch. One respondent felt that there should be more money spent by the Scottish Government to encourage sustainable fishing practices. One other respondent felt that the use of more sustainable practices may help to improve consumer confidence in fishing, feeling this was an important social outcome.

The fishing sector surviving and thriving
An important social outcome of managing inshore fisheries felt by several respondents was the importance of the fishing industry being able to survive and thrive. Some respondents felt that it is important that fishing can provide secure and stable jobs, which are of high quality. Some respondents felt that an important social outcome would be for fishers to be able to make a good living, with easier, safer and fairer working conditions, which could lead to improved fisher mental health and wellbeing of coastal communities. A small number of respondents wished for positive perceptions of the industry, wanting to be proud, confident in the industry and have increased morale in the sector. A small number of respondents felt that they want businesses to be growing with the industry flourishing. It was felt by a small number that the fishing industry is suffering at the moment, with one respondent feeling that this is due to fluctuations in policy.

Local management
Local management of inshore fisheries was outlined as an important social outcome by some respondents. Some felt that local management should provide local opportunities, where local people, including coastal communities and local fishers

can feel heard, leading to greater inclusion and representation, and outlined this as an important social outcome. A small number of respondents raised the importance of using local people with local knowledge of the local environment and industry to make decisions related to local areas. A small number of felt that inshore fisheries should not be managed from cities, where individuals are distanced from fisheries.

New entrants

Ensuring new entrants can and want to enter the fishing industry was raised by some respondents as an important social outcome of inshore fisheries management. A small number of respondents felt it was important that fishing is seen as an attractive job to new entrants with good fish stocks. Similarly, a small number of respondents felt that an important social outcome is that young people are encouraged to consider fishing as a career (e.g. through careers guidance) and provided with sufficient training and skills to join the industry. One respondent felt it is important that newer boats are made accessible to younger generations by moving vessel licenses from old to new boats. One felt that an important social outcome is that a range of jobs related to fishing are available for young people e.g. in restaurants and in fishmongers. One outlined that ensuring young people are attracted to the industry can help to ensure the future viability of coastal communities.

Generational fishing

Some respondents felt that an important social outcome is ensuring fishing can continue to be passed through generations, with a small number outlining the need to be proud of the fishing opportunities left for future generations. One respondent outlined this more broadly, feeling that it was an important social outcome that coastal communities are vibrant for future generations.

Resilience

A small number of respondents felt that fishing can create economic, social and food resilience in rural and coastal communities, and outlined this as an important social outcome. A small number outlined the importance of resilience in fishing employment, providing diversity of jobs and fair work. Additionally, one respondent raised the importance of resilience of ecosystem services and one other respondent raised the importance of resilience in light of a changing climate and marine environment, each as important social outcomes for inshore fisheries management.

Diversification

A small number of respondents felt that it was socially important for fishers to be able to diversify into more sustainable fishing methods. One respondent specified the need for diversification in the face of changes to fish stocks and the climate.

Broader social outcomes

Coastal community wellbeing and resilience

A majority of respondents outlined coastal community wellbeing and resilience as an important social outcome of inshore fisheries management. A common view held was the need to ensure that a secure and stable future is provided for coastal communities, which can help local people to thrive and provide long term economic

stability and a better future. Several respondents raised the importance of stopping rural depopulation and loss of jobs, and instead growing and/or protecting coastal communities and increasing their resilience. Several respondents felt that supporting remote and rural areas, which often have minimal employment options, is an important social outcome of inshore fisheries management. Some respondents outlined a link between fishing and coastal community wellbeing, with fishing perceived to support local communities and also providing an important part of the local identity. One respondent felt that if this does not currently occur:

> "On the west coast in particular once the fishing jobs are gone there are no new jobs coming in people in turn then leave. It leads to a loss of identity and small communities."

And one other respondent felt that:

> "In many cases the overall health of communities depend on the existence of fishing i.e. keeping local shops open and adding to the school roll."

Some respondents felt that local employment in often low-impact small-scale fisheries can benefit local communities, as resources directly re-enter the local economy. The importance of maintaining social cohesion and a sense of community in coastal communities was noted by some respondents, along with the impact this can have on community wellbeing. Some respondents also felt an important social outcome was that local communities are involved in decisions that affect them. One respondent outlined the need to ensure that coastal communities are resilient to a changing climate.

Employment and boosting the local economy

A common theme outlined by respondents as an important social outcome was increased employment and jobs as a result of inshore fisheries management, with several respondents outlining the value in boosting the local economy. Several respondents felt a successful social outcome would be the provision of a diverse range of jobs (including tourism, fishing, seafood processing, marine services) in local coastal areas, as a result of improvements to the local environment and better managed fisheries. Some respondents outlined the importance of jobs for fishers, on and offshore, with some outlining how fishing can support a variety of jobs indirectly but still related to the industry. One respondent stated:

> "Smaller boats with local crews put their money back directly in local economies. They buy their paint at local shops, rather than having the boat slipped at a major port, often overseas. The handling of their catch creates a base level of transport which can sustain other businesses. Local hotels and restaurants can supply locally caught fish which is an attraction to visitors, as well as being healthier for locals than brought-in processed food."

Some respondents mentioned the importance of jobs being of high quality and stable. A small number of respondents explicitly referred to the need for local employment for local people, with a small number of respondents outlining how local

fishing and local fish processing could support the local economy. A small number of respondents also felt the Scottish Government should try to boost local economies and support local businesses.

Tourism and recreation

Several respondents felt that improved recreational and leisure activities was an important social outcome of inshore fisheries management. The most frequently mentioned recreational activity referred to was sea angling, with some respondents feeling that improved fish stocks should help to improve recreational sea angling, hobby fishing for sustenance, and diving opportunities. Additionally, some respondents felt improved marine biodiversity would in turn enable wildlife and environmental tourism, with snorkelling and photography mentioned in particular. A small number of respondents felt that it was an important social outcome to ensure that tourism and recreational opportunities are not negatively impacted by commercial interests, with one respondent feeling that the Marine Directorate should do more to support tourism and recreational activities. A small number of respondents outlined the impact that they felt tourism and recreation can have on the local economy, due to tourists spending money in the area and using local facilities.

Participation

Some respondents felt it was an important social outcome to ensure that a diverse range of stakeholders are involved in inshore fisheries management, including the Scottish Government, NGOs, scientists, coastal communities, other stakeholders and diverse fishing interests. A small number of respondents outlined the importance of cooperation, working together and communicating, whilst one felt it important that stakeholders compromise in order to reach agreement. A small number of respondents felt that fairness in participation was an important social outcome, with one respondent highlighting that there should be "local management with representation from all users of the coastal environment with equal access, influence and voice at the discussion table". A small number outlined the need to engage fishers in decision-making at an early stage, with one respondent highlighting that this may be achieved more easily with regional management.

Culture

Several respondents felt that it is socially important to protect the cultural heritage of coastal communities. Some respondents specifically outlined views regarding the importance of protecting historical fishing villages and communities, where fishing traditions are often embedded and integral to local identity. One respondent felt that "for a lot of areas their whole history and identity is built on the back of the fishing industry", and suggesting the preservation of this is an important social outcome of fisheries management. A small number of respondents echoed similar feelings, outlining deep cultural ties to fishing. The importance of protecting West Coast fishing heritage was felt by two respondents: "Small fishing communities are at risk of being wiped out on [the] West coast of Scotland and deserve particular attention and investment as they underpin Scottish maritime heritage and culture."

A small number of respondents outlined views regarding the importance of protecting traditional ways of life, local customs and festivals. A small number of respondents

also raised the need to consider the role of small-scale fishing in local culture, and the importance of respecting local cultural needs in decision-making.

Provision of local food

Some respondents felt the provision of local seafood is an important social outcome of inshore fisheries management. Some respondents raised the importance of making sure fish and seafood supply chains are local (e.g. direct to consumers/to hospitality), leading to the sale of local fish and local consumption of this food source and consequently fewer imports and more sustainable food systems. A small number of respondents raised the social importance of consumer confidence in buying local seafood, trusting that it is sustainably sourced, of high quality, and the marine environment is healthy. A small number of respondents also felt that increased provision of local fish could result in healthier diets for local people, feeling this is an important social outcome of fisheries management.

One respondent summarised the above findings:

> "When fisheries are sustainably managed, they provide fresh, locally sourced seafood that supports healthier diets and strengthens the link between consumers and coastal communities. By improving local supply chains and encouraging direct sales, Scotland can enhance the availability of locally caught fish and shellfish, reducing reliance on imports while boosting local economies. Greater consumer confidence in sustainable seafood is an important aspect of this. When consumers trust that the seafood they purchase is sourced responsibly, they are more likely to support local fishers who use sustainable practices."

Sustainable jobs

Some respondents felt that an important social outcome is the creation/preservation of diverse and sustainable jobs. A small number of respondents felt that these should not be limited to fishing and also includes tourism, restoration and research. A small number of respondents felt that sustainable jobs should not have adverse impacts on the environment or on other people. Similarly, a small number of respondents felt a healthy marine environment can help to support coastal communities, including helping to provide jobs.

Public wellbeing

Some respondents outlined a view that a healthy marine environment is important social outcome for inshore fisheries management. A small number of respondents felt that knowing the marine environment is being looked after and is healthy can result in public wellbeing. A small number felt the enjoyment the public can get from the marine environment is a socially important outcome. A small number of respondents also felt that all people should have access to the marine environment.

Education

A small number of respondents outlined the social importance of education about fishing and its benefits, or more broadly about the marine environment and potential impacts on it.

Other

Other topics mentioned by a small number of respondents include: shared ownership of Scotland's seas; quota allocations; enforcement; compensation; investment; diverse jobs; reputation; and well managed fisheries.

Part 4: Regional Inshore Fisheries Management

Question 8: Do you favour or oppose a potential transition to a more regional model of inshore fisheries management in Scotland?

96 respondents provided an answer to this question (see table 3). A majority of respondents (76) favoured or moderately favoured a more regional model of inshore fisheries management in Scotland. Some respondents (10) opposed a more regional model.

Table 3. Responses outlining whether respondents favour or oppose a potential transition to a more regional model of inshore fisheries management in Scotland.

	Number of respondents
Strongly favour	61
Moderately favour	15
Neutral	10
Moderately oppose	7
Strongly oppose	3
Not answered	4
Total	**100**

68 respondents provided an explanation for their opinion, of which 7 had responded neutrally, 8 had opposed a more regional model and 53 favoured a more regional model. Due to the low number of respondents who selected that they opposed or were neutral towards a regional model, responses are detailed in the text where three or more respondents detailed a theme, to enable greater explanation of these views. Views have been described under the headings of favour, oppose and neutral for ease of reading.

Favour

Local approach
A common theme across respondents was the view that a more local approach would generally result in more successful outcomes. Several respondents felt that local approaches would be better tailored to suit local needs, with a small number highlighting that this would increase transparency and policing of local management, as well as making it more responsive to changing circumstances. In addition, a small number of people felt that a local approach would help to increase a sense of ownership and responsibility for fisheries. Some felt that a more local approach would increase accountability to ensure that management is fit for purpose locally whilst helping to meets wider national objectives. Finally, a small number of respondents felt that a local structure would support research at a local level, helping to develop a local evidence base that can better inform management.

One respondent felt that currently priority is given to areas with more fishing vessels and bigger ports, and felt that a regional approach would be beneficial for all ports and in particular smaller fishing communities to ensure all fishers are heard. Another felt that a more regional approach would benefit from development of local strategies to underpin management decisions. One felt that a small area would enable a local representative to be more readily available to support local management.

Stakeholder engagement

Among those who favoured a regional approach to inshore fisheries management, there were some conflicting views regarding stakeholder engagement at the local scale. A small number of people felt that management should be led by local fishers within the given region, whereas some felt that a much wider group of stakeholders who have an interest in the local marine management should be involved in fisheries management discussions.

Some respondents felt that regional management would be beneficial because it would allow local communities and industry to have a voice in fisheries management, with some highlighting that it would be important to allow representation from all with relevant interests. A small number expressed views that management must be inclusive and fair/balanced across stakeholder interests. One respondent felt that a regional approach might improve communication by making it easier to make contact the appropriate representatives.

Diverse industry

Some respondents felt that a regional approach to fisheries management would enable better management due to the diversity of the industry across Scotland. A small number felt that this would enable a more tailored approach more appropriate to each region, with some flagging the different environments, fisheries and priorities around Scotland's coast. A small number also felt that this would enable adaptive management that is more responsive to change. One respondent simply felt that the industry was too diverse to be managed at a national scale.

National framework

Some respondents, whilst supportive of a regional model, outlined the need for regions to operate under a national framework to ensure consistency and accountability. In particular, a small number flagged the need for a national component to the model to ensure accountability against national and internation biodiversity commitments. One respondent felt the a national framework/plan should be a subset of the National Marine Plan. Another felt that there should be a national group with oversight that should mirror the regional groups in order to support understanding of the system by all.

IFCAs

Some respondents identified IFCAs in England as an example of regional management that is perceived to be working more effectively than current management practices in Scotland (e.g. allowing regions to tailor their fisheries approaches to local areas; clear aims and objectives), and felt that potential regional

management in Scotland should be guided by the IFCA model. One respondent felt that:

> "The argument that such a system is unaffordable…is simply not credible. While a consultation is welcome, excluding this proven and effective management model from consideration is unacceptable."

In addition, a small number of respondents felt that a regional model akin to that of the IFCAs could be beneficial to enable collection of locally important data.

RIFG criticism

Some respondents favoured a regional approach but cited criticism of the RIFG networks. A small number of respondents felt that the area covered by each RIFG is too large and they do not properly represent people at a local scale. Finally, a small number of respondents felt that the lack of statutory footing underpinning the RIFGs has limited their ability to make a difference or resulted in their inability to deliver local management, and felt they should be held accountable to deliver on clear objectives.

Resource

A small number of respondents were supportive of a regionalised model but flagged that it must be properly resourced and should enable sufficient resource for science. One respondent suggested using resources currently used to maintain Marine Directorate's coastal Fishery Offices to instead support an IFCA-like entity.

Improved management

A small number of respondents felt that local decisions would be more effective so long as it is properly set up, enabling it to be more transparent and increasing how easily resulting management can be enforced. One respondent cited an example where local management was felt to have resulted in improved fisheries management.

Technology/ data

A small number of respondents who favoured a regional approach mentioned technology. One felt that encouraging fishers to adopt new technologies such as REM would lead to improvements in fishing efficiency. They also felt this would increasing a sense of ownership/responsibility as fishers become more connected to the data that informs decision making. Others felt a need to data to be gathered locally and that it should be sufficiently accessible to enable it to effectively inform local fisheries management.

Considerations for implementation and subsequent management

Although this question sought input to inform the development of a new management model, some respondents provided comments relating to implementation and specific management tools.

Some respondents were supportive of regionality and felt that the Scottish Government should apply an ecosystem approach when developing a new framework, focussing on the needs of the ecosystem when determining regionality to

ensure that local, national and international environmental commitments are met. One respondent felt their support for alignment with the Convention of Biological Diversity's Ecosystem Approach which supports decentralized systems.

A small number of respondents took the opportunity to suggest specific localised management tools that they felt could be used under a new management framework, in particular some sort of regional permit/licence system. One suggested this would enable all permitted fishers in a given region to be consulted in an open and fair way on management decisions; another felt that a committee made up of local fishers and Fishery Offices should be responsible for administering such a system.

Other

Other responses provided by respondents included criticism of centralised decision-making; criticism of the current model; marine spatial planning; examples from the Shetland model and the Mull creel limit pilot project; and a need for strict enforcement.

Oppose

Responsibility

A small number of respondents felt that there was insufficient detail available about where responsibilities within a regional management system would lie to support it, flagging that we need to be clear about this if we proceed with a regional model.

License/ permits

A small number of respondents flagged issues that they felt would come about if some sort of regional licence/permit system were brought in. One felt that regional variation would result in the dilution of licence conditions and subsequently make it more difficult to buy and sell vessels. Another felt that existing examples of local management schemes with discrete permits have resulted in expensive permits and that it had not benefited the local fleet.

Would not work

A small number of respondents felt that a regional approach would not work well. One felt that too much variation of control may impact on supply changes. Another felt that boundaries could cause displacement and overfishing in specific areas. One felt a regional system would make it harder to take account of legitimate interests from users who live outside of the area.

Fishing in many areas

A small number of respondents felt that some fishers in Scotland require flexibility to fish in a number of areas ("nomadically"), and that a national approach is therefore preferable. One felt that boundaries could cause displacement of fisheries, leading to overfishing in specific areas (though they were supportive of larger scale regional control with geographical boundaries).

Other

A range of other topics were raised by a small number of respondents who were opposed to a regional approach. These included; the Shetland Regulatory Order, negative impacts of creating division, and issues with resourcing.

Neutral

National plan

A small number of respondents did not have issues with a regional model but felt that a national plan was necessary; both to ensure clarity of strategy and accountability, and to ensure fairness across the board.

Other

A range of other topics were raised by a small number of respondents. These included; the Shetland Regulatory Order, an ecosystem based approach, and local decision making.

Question 9: What should we be mindful of when considering the potential transition to regional inshore fisheries management in Scotland?

79 respondents raised themes that they thought we should be mindful of when considering a potential transition to regional inshore fisheries management in Scotland. Answers can be summarised into five themes: governance; stakeholder engagement; fishing differences; environmental considerations and speed of delivery. Each theme will be detailed in turn, with sub-topics within these themes discussed in order depending on how frequently they were mentioned by respondents.

Governance

National level governance

Several respondents raised the view that any move towards regional management will need to be mindful of national obligations and will require national level structure. Some respondents raised the view that any regional management will need to be integrated consistently with national planning and policy and help to deliver on national and international commitments (e.g. National Marine Plan; Good Environmental Status; Marine Strategy Framework Directive; OSPAR). Mirroring comments made in response to question eight, it was felt by some respondents that there is a need for an overarching national strategy, national standards and that the Scottish Government will need to define what regional management will look like (e.g. legislative instruments; how decisions will be made; consultation; rules; how obligations will be met; objectives; what will be decided nationally vs regionally). A small number felt there is a need for national level oversight, with strong management (perhaps through Steering Groups, or skilled facilitators) and a clear framework. Some respondents felt that integrating regional inshore fisheries

management into regional spatial planning could be a key way to ensure fisheries are not dealt with in isolation, and could provide a good framework for action.

Resources

Several respondents raised a need to be mindful of resources when considering a potential transition to regional inshore fisheries management. It was raised by some respondents that it was necessary for the Scottish Government to commit to adequate funding of local management at an early stage, which should be sustainable long term and ongoing, to enable effective regional management. A small number of respondents felt that local management will be ineffective without appropriate resource, and resources will constrict how effective management is. It was felt by one respondent that a move to a regional model will be a net cost, and a small number of respondents raised the need for use of funds to change to support this approach. Some respondents raised a range of additional areas which require further funding, including supporting participation in regional management, funding science and monitoring, education, employment, enforcement and enabling fishers to diversify. However, a small number of respondents simply felt that the Scottish Government has limited resources with one highlighting that there are not enough funds to support regional management.

Data

The importance and quality of data collection and analysis was reported by some respondents. It was felt by a small number of respondents that there is a need to gather quality scientific data to inform decision-making for regional inshore fisheries management. A small number felt that data collection and analysis could occur both nationally and regionally, and that it could be shared between industry and scientists. One respondent felt the importance of defining a structure for how data will be collected and used. A small number of respondents felt the need for a national depository of data and sharing between regions, with a small number highlighting the importance of data being accessible. A small number of respondents felt new technologies could improve data being collected, with one respondent highlighting the need for scientists to keep up to date with Artificial Intelligence (AI) tools to assist with analysis. It was highlighted by one respondent that any data collection will require resources, with another respondent highlighting that data collection could be improved.

Enforcement

Some respondents felt that we need to be mindful of enforcement when considering the transition to regional inshore fisheries management. It was the view of a small number of respondents that there needs to be a regional/ local ability to enforce compliance with fishing rules. A small number felt that modern technology could help to improve enforcement. Additionally, one respondent felt that it could be difficult to ensure enforcement when rules vary regionally. Another highlight that resources are needed for enforcement, whilst one respondent suggested that license points or disqualification could be suitable methods of penalty to deter non-compliance.

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IFCAs

As echoed in some responses to question eight, some respondents responded to this question with their view that we should look to the English IFCA model to learn about how regional inshore fisheries management could be facilitated. Successes of the IFCA model were outlined by a small number of respondents, these included: the power to make byelaws; remit to protect the environment and fisheries interests; resources for monitoring, implementation and local enforcement; heterogeneous membership; integration with national policy; and the involvement of local authorities. A small number of participants outlined perceived issues with the IFCA model, with concerns about reliance on local authorities, inadequate funding, and relationships between IFCAs cited.

Local authorities

A small number of respondents felt it important that strong links are created between local authorities and any regional inshore fisheries management groups. It was raised by a small number of respondents that this could help increase democratic accountability of inshore fisheries management.

Stakeholder engagement

Balance of stakeholders

A common theme raised by respondents was the importance of being mindful of balancing interests of stakeholders and ensuring inclusive engagement in making decisions for regional inshore fisheries management. It was felt by some respondents that involvement in regional inshore fisheries management needs to be well balanced in the participation of stakeholders. Balance was raised by several respondents in reference to including a full range of different fishing interests (all different forms of fishing, non-fishing interests, communities, viewpoints) as well as including a range of non-fishing stakeholders, including local interest groups, businesses, local communities, environmental groups, and recreational groups. It was felt by one respondent that:

> "participation in regional governance must be fair and inclusive, ensuring that marginalised or under-represented voices are identified and brought in"

It was the view of a small number of respondents that any engagement should be inclusive of voices that might not otherwise be heard. They felt that all stakeholders should be truly listened to and not drowned out, with not all ideas coming from the Scottish Government. A small number of participants felt the importance of ensuring the right people are involved in decision-making to ensure unbiased priority setting. It was raised by a small number of participants that engagement needs to be planned in advance, with processes well defined, including potentially supporting involvement through financial assistance (e.g. of small-scale fishers). It was the view of a small number of respondents that management should involve a balance of interests - *"in balance with available stocks and having a healthy marine environment"*. One respondent outlined their view that it was important that managers have connections to the local area, but also recognised it would be challenging to ensure these

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individuals do not have a financial interest in coastal areas, which they felt would bias their inputs.

Involving local communities

Some respondents outlined the importance of being mindful of local communities when considering a transition to regional inshore fisheries management. A small number of respondents felt a need to work closely with local communities, genuinely listen to local communities, hear their concerns and gain their support. One respondent felt that "local stakeholders must feel that their opinions count". A small number of respondents outlined the importance of enabling local communities to get involved in fishing/ fishing management, and the importance of giving agency to local communities.

Fishing differences

Variation in the industry

Some respondents felt that we should be mindful of regional differences associated with fishing (including traditions), and the varying forms of diversity within the fishing industry (e.g. different gears, target species, views of fishers and sizes of effort) when considering a transition to regional inshore fisheries management. One respondent felt that every area is different and that there *is* "not a one size fits all approach", with another highlighting that regional management allows "custom approaches to fisheries management".

Different rules in different areas

Some respondents raised concerns about potential adverse impacts of regional inshore fisheries management due to there being different rules for fishers in different areas. Some respondents felt that fishers might be displaced between areas to avoid local rules which could impact local areas, with a small number of respondents raising concern about regions needing to work together to ensure that management in one area is not negatively impacting other areas. A small number outlined the view that some fishers are nomadic and regularly move their effort between different areas. A small number of respondents felt that fishers might find it difficult to be aware of varying rules in each area, may end up overfishing areas and it may also be harder to enforce rules that vary per region. A small number of respondents felt that regional management could result in different solutions to the same issue. One respondent felt that "harmonisation of fisheries management measures across boundaries should be considered".

Protecting fishing

A small number of respondents raised the view that fishing should not be negatively impacted by a transition to regional inshore fisheries management. For instance, they felt that it should not adversely impact the movement of boats allowed, should ensure fish stocks are protected, that the industry is profitable, and should be well managed to make it a viable career option for young fishers. One respondent felt it would be beneficial to focus on the economics of the fishing fleet.

Local management

A small number of respondents outlined the importance of local management when considering a transition to regional inshore fisheries management. Similarly, a small number specified views around the importance of those managing inshore fisheries having local knowledge of the marine environment and fisheries, and connections to local communities. A small number of respondents felt it important to involve local fishers from the grassroots in decision-making.

Environmental considerations

Environmental impacts

Some respondents felt it important to be mindful of environment impacts and protecting the environment when considering a transition to regional inshore fisheries management. One respondent outlined the need to consider changing fishing practices in response to climate change and other marine conditions. One respondent highlighted the importance of ensuring that "economic interests must not take precedence over environmental protection".

Just transition

Some respondents felt that it is important to be mindful of ensuring a just transition (for fisheries/ the environment/ communities) when considering the transition to regional inshore fisheries management. A small number of respondents highlighted the importance of ensuring stakeholders are listened to in order to enable a just transition.

Speed of delivery

Change takes time

It was the view of a small number of respondents that it will take time for a move to regional management to occur, with one respondent highlighting the importance of the process being completed gradually.

Other

A range of other topics were raised by a small number of respondents. These include: monitoring and evaluation; fisher input; acting with haste; ecosystem-based management; including local knowledge; flexibility in management; set objectives; licensing and well considered management.

Question 10: Could any of the existing coastline delineations (as outlined above) be used for regional inshore fisheries management or do we need a new/different approach/delineation?

54 respondents provided details of coastline delineations that they thought could be used for regional inshore fisheries management (see table 4). Some respondents provided more than one answer. The most frequently mentioned delineation was

Scottish Marine Regions, of which 20 respondents suggested a preference for this option. 12 respondents felt that Regional Inshore Fisheries Groups should be used (7) or inshore fisheries management should use the delineations already used (5) whilst eight respondents thought that a new approach is needed, and eight respondents detailed other options. Five respondents referenced specific geographic areas and five respondents thought that small areas are better. One respondent thought that Coastal Operations Districts should be used, whilst no respondents thought Fisheries Offices, Scotland Island Regions or Scientific Stock Assessment Areas should be used.

Table 4. Respondent's suggested coastal delineations for a regional management model.

Delineation	Number of respondents
Scottish Marine Regions*	20
Regional Inshore Fisheries Groups*/ keep how it is	12
Coastal Operations Districts*	1
Marine Directorate Fisheries Offices*	0
Scotland Island Regions*	0
Scientific Stock Assessment Areas*	0
New approach needed	8
Smaller areas are better	5
Reference to specific geographic areas (e.g. The Hebrides/ Firth of Clyde)	5
Other	8

*these delineations were listed as examples within the Call for Evidence text.

35 respondents gave details of why they selected their delineation, however there was very little consensus amongst respondents. Due to the low number of respondents who selected different delineations, responses are detailed in the text where 2 or more respondents detailed a theme, to enable greater explanation of these views. The only delineations with any consensus (more than 1 respondent) in their explanation was for 'Scottish Marine Regions' and for a 'new approach needed'. For Scottish Marine Regions, a small number of respondents thought they should be used to align with marine spatial planning, with small numbers of respondents also stating that: RIFGs are too big, new delineations would delay action and that management should be up to 12 nautical miles. For a 'new approach needed' a small number of respondents simply thought that the current system and existing delineations are not working.

Question 11: Please explain why the delineation you suggested above would work better than others? What are potential benefits/strengths of this approach?

48 respondents provided explanations as to why they thought the delineation they selected for regional inshore fisheries management would be better than others. Due

to the low number of respondents who selected different delineations, responses are detailed in the text where 2 or more respondents detailed a theme, to enable greater explanation of these views. Explanations are first detailed for specific delineations, with some general comments which were present for multiple delineations detailed subsequently.

11 Scottish Marine Regions

Align with marine spatial planning

Some respondents felt that Scottish Marine Regions should be selected as a delineation for regional inshore fisheries management because they would align with the delineations already used for marine spatial planning. Some respondents felt that the use of Scottish Marine Regions would make it easier for regional inshore fisheries management to be integrated with marine spatial planning, which could be beneficial. A small number of respondents thought that regional inshore fisheries management should be delivered through marine spatial planning. A small number of respondents thought that tis delineation should be used as it is already clear and legally defined and would be simple to use and reduce overlap. One respondent believed that aligning with marine spatial planning could lead to better stakeholder management.

Areas are of a manageable size but make ecological sense

Some respondents felt that using Scottish Marine Regions to manage regional inshore fisheries would result in areas that are of more geographical sense than currently used. A small number of respondents felt that this would result in areas being used that are of a large enough size to be significant, but small enough to be ecologically relevant. A small number of respondents felt that division by Scottish Marine Regions would be more consistent with geographical features and better represent geographical differences than the current division into RIFGs.

Better than defining new areas

A small number of respondents felt that defining new areas would be unnecessary, potentially complicated and confusing and could lead to delays in management, and so felt it better to use the already established Scottish Marine Regions.

Need to be local

A small number of respondents thought that Scottish Marine Regions would be appropriate for managing regional inshore fisheries as they are in some cases smaller and more local than current delineations. A small number of respondents thought this could help to encourage local engagement and could lead to decisions being more tailored to local areas. One respondent highlighted concerns that larger areas may not be fully accountable to local concerns, with another calling for a larger number of small management units to be used.

RIFGs are too large

A small number of respondents outlined that Scottish Marine Regions should be used as they felt current RIFGs are often too large and not local enough.

Areas smaller than Scottish Marine Regions would be too small

A small number of respondents felt that delineations smaller than Scottish Marine Regions would be too small to manage. One respondent felt that this could lead to micromanagement with another highlighting that this could lead to the need to manage areas with very little fishing effort.

6 Regional Inshore Fisheries Groups (RIFGs)

Divisions make sense

A small number of respondents felt that RIFGs are already well divided into areas which make geographical sense, so should continue being used.

RIFGs enable local management

A small number of respondents felt that RIFG delineations allow for local management, with one respondent highlighting that they group local fishers, and another stating that they enable local management and enforcement.

National discussions

A small number of respondents felt that national discussions still need to take place even with RIFG delineation, with one respondent highlighting the role of FMAC or national RIFG meetings, and another highlighting that national fora need to be aware of what is occurring regionally.

New approach needed

Existing delineations do not work

A small number of respondents felt that a new delineation approach is needed for regional inshore fisheries management, with one respondent highlighting that current delineations are "dysfunctional" and another stating the system as a whole does not work.

Smaller areas are better

Increase benefits to local areas

A small number of respondents felt that smaller areas than those currently used would be beneficial future delineations for regional inshore fisheries management, so that benefits to local areas can be increased, with more relevant management. One respondent thought that smaller management areas have been successful in certain areas.

Reference to specific geographic areas

The Hebrides/ Outer Hebrides

A small number of respondents felt that the Outer Hebrides is an already defined management unit that has been successful. A small number of respondents felt that the fishing stocks of interest in this area, shellfish, tends to be localised and therefore easier to manage locally than more transient species such as white fish.

General comments

A few overriding themes were provided as explanations for the selection of a number of delineations. These were the importance of areas being local; using existing defined areas; and topics of scale.

Local

Several respondents mentioned the importance of management being local. Some respondents felt that management should involve local people, with local interest and knowledge making decisions about how the local area is managed. A small number of people raised the view that most fishers fish locally, with management of their local stocks therefore important. One respondent felt that it would be easier for fisheries managers to focus efforts on a smaller local area.

Existing defined areas

Some respondents felt that using areas which have already been defined would be better than defining new areas altogether. Some respondents felt that where delineations are already working or in place, it would be unnecessary to create new delineations. A small number of respondents felt that creating new delineations could be a waste of effort, lead to confusion or result in delays.

Geography and scale

Some respondents outlined the importance of geography and scale when discussing delineations. A small number of respondents felt that divisions should be based on geographical features, with a small number highlighting that the scale selected needs to be ecologically significant. A small number of respondents felt that existing areas are too large, whilst conversely a small number of other respondents felt that areas are too small, with one commenting that the size of RIFGs varies too much. A balance of sized spaces are needed that are both local and large enough to manage according to a small number of respondents. One respondent felt that the geography is not the most important factor.

Question 12: What are potential challenges/weakness of the delineation you suggested above?

46 respondents provided potential challenges or weaknesses that they thought the delineation they selected for regional inshore fisheries management would have. Due to the low number of respondents who selected different delineations, responses are detailed in the text where 2 or more respondents detailed a theme, to enable greater explanation of these views. Explanations are first detailed for specific delineations, with some general comments which were present for multiple delineations detailed subsequently.11 Scottish Marine Regions

Resource constraints

A small number of respondents raised the view that they thought resource constraints may act as a challenge towards using Scottish Marine Regions as delineations for regional inshore fisheries management. A small number of

respondents felt that moving from RIFGs to Scottish Marine Regions might require increasing levels of resources. One respondent felt that it would be challenging to implement regional inshore fisheries management unless adequate funding was made available.

Local authority involvement

A small number of respondents raised local authority involvement as a potential challenge to using the Scottish Marine Region delineation. A small number of respondents raised the view that several local authorities may need to be involved or work together under this delineation. A small number of respondents raised the view that to ensure democratic governance and accountability management should be under local authority/ joint local authority control.

Political will

A small number of respondents raised concerns about political will for regional inshore fisheries management, with one respondent highlighting that there has been a lack of political will when it comes to regional marine planning.

Nomadic fishers

A small number of respondents raised concerns about nomadic fishers if moving to smaller Scottish Marine Regions, with one respondent highlighting that it will be important that fishers can move between different areas and another highlighting concerns about having different rules across boundaries.

6 Regional Inshore Fisheries Groups

Resource constraints

A small number of respondents raised concerns about resource constraints, with one respondent raising concerns about potential different levels of resources between different regional groups.

New approach needed

Resource constraints

A small number of respondents raised concerns about resource constraints, with one respondent concerned that any change to inshore fisheries management will require resources which the Scottish Government lacks.

Other approach – combining council areas into larger areas

Resource constraints

A small number of respondents raised concerns about resource constraints, with one respondent believing this approach would be more expensive than using RIFGs and another raising concerns about a lack of suitable trained staff resources.

Did not select a delineation

Involving the right stakeholders

A small number of respondents raised concerns about getting the right stakeholders involved. A small number of respondents felt the need for anybody involved in managing the system to be there for the greater good, rather than for personal benefit. One respondent raised the view that those involved should reflect the interests of all people from coastal areas.

General comments

Resource constraints

Some respondents raised concerns about resource constraints and delineations of regional inshore fisheries management. A small number of respondents raised the view that changing delineations, especially into smaller areas, might be more expensive than the current RIFG model. A small number of respondents felt that resources are already stretched, with a small number of respondents highlighting the difficulty in ensuring the right people with right skills are involved. One respondent felt it necessary that funding is ring fenced whilst another raised concerns about different levels of funding for different regions.

Nomadic fishers

Some respondents raised concerns about delineations in regional inshore fisheries management affecting nomadic fishers. A small number of respondents felt it important that fishing vessels could regularly move between different management areas, with one respondent stating that "it should be possible for fishers to migrate between different areas with minimum bureaucratic resistance". A small number of respondents demonstrated concerns about the impacts of vessels being displaced as a result of varying local rules. A small number of respondents raised concerns about the difficulties that different rules may cause for people working over boundaries of management areas.

Enforcement

A small number of respondents highlighted concerns about enforcing regulations which might vary between regions.

Oversight

A small number of respondents felt there should be oversight of regional inshore fisheries management at a national level.

Part 5: Governance and Co-Management

Question 13: What stakeholder groups should be involved and how should each feed into development of inshore fisheries management measures?

90 respondents responded to this question and listed organisation(s) whom they feel should, or should not, be engaged in the development of inshore fisheries management measures. These stakeholders fall under a number of key groups which are listed below. Names of specific organisations have not been included in this report, but will be considered in full as this policy is further developed. Where provided by respondents, stakeholder groups are only listed where two or more respondents detailed their involvement.

Table 5 below outlines the stakeholder groups suggested by respondents. The fishing industry or fishing industry representatives were the most common stakeholder identified for participation, shortly followed by environmental groups, the public/ community and 'all stakeholders' who were also commonly mentioned. Other stakeholders were also mentioned by some or a small number of stakeholders

Table 5: Stakeholder groups suggested by respondents for inclusion within new management framework

Stakeholder category	Number of respondents
Fishing industry/ fishing industry representatives	50
Environmental groups	30
The public/ community	28
All stakeholders	26
Other commercial operators	14
Recreation	12
Academics and scientists	11
Marine Directorate	10
Young people	10
Tourist providers	9
Industries reliant on fishing	6
NatureScot	5
IFGs/ RIFGs	5
Local authorities	4
Aquaculture	3
Community councillors	2
Renewable developers	2
Highland and Island enterprise	2

Respondents provided some explanation as to how they believed different stakeholders should feed into inshore fisheries management. Key themes identified are discussed below in turn. Where entire models of stakeholder participation were

provided by respondents, these are not included in this Call for Evidence report but will be used to inform decision-making.

In addition to describing those who they felt should be included within inshore fisheries management, a small number of respondents also outlined a preference to exclude environmental groups from the development of inshore fisheries management measures.

Themes

Fair representation

Some respondents raised the view that stakeholder representation in inshore fisheries management should be fair. Some respondents felt that all stakeholders with an interest in the management of inshore fisheries should have their views fairly considered, with some respondents highlighting that the interests of the inshore area should be fairly represented. A small number of respondents mentioned that it should be ensured that no one group dominates discussions and that management is unbiased.

Co-management

Some respondents raised themes related to putting co-management in place. Some respondents felt that effective co-management needs to involve the inclusion of all relevant stakeholders in decision-making. A small number of respondents felt that co-management needs to be evidence based. A small number of respondents also raised the view that interested stakeholders should be able to self-nominate themselves to be involved on topics of interest. A small number of respondents felt that co-management should empower local communities and provide them with a meaningful voice. A small number of respondents felt that co-management so far has not been achieved, with one respondent stating it has been skewed towards the large-scale trawling sector. A small number of respondents felt that co-management should result in the sharing of power and responsibility for inshore fisheries management. One respondent felt that co-management needs strong leadership, and another asked whether co-management is really what the Scottish Government intends to put in place.

IFCAs

Echoing responses to earlier questions, some respondents outlined their view here that inshore fisheries co-management in Scotland should operate more like IFCAs in England. A small number of respondents detailed strengths of the IFCA model, including that it has a greater balance and diversity of stakeholders, is evidence based and constitutes effective stakeholder management.

Youth representation

Some respondents felt that there should be a stronger youth voice involved in inshore fisheries management, and that formal youth representatives should be included in decision-making.

Transparency

A small number of respondents felt that inshore fisheries management should be more transparent. A small number felt that all decision making for inshore fisheries management should be transparent, whilst a small number of respondents raised the importance of transparency surrounding who organisations involved in inshore fisheries management represent.

Conflicting views impacting on progress

Some respondents felt that having too many conflicting views involved in decision-making can result in a lack of progress for inshore fisheries management. A small number of respondents felt that having people with polarised opinions or conflict in the same discussion can block progress made by the Scottish Government, leading to potential paralysis in decision-making. A small number of respondents believed there should be separate opportunities for different groups of stakeholders to be involved with discussions with the Scottish Government. A small number of respondents believed there should be a distinction between stakeholders/ direct stakeholders and opinion-holders/ indirect stakeholders in decision-making.

Fairer inclusion of all fishers

A small number of respondents raised concerns about how and who out of fishing interests are involved in inshore fisheries management. A small number of respondents raised the view that there has historically been an overweighting of large-scale trawl and dredge interests involved in decision-making/ in RIFGs, which is weighted greater than the proportion of the industry they make up. One respondent felt that all fishers should be represented equally, and highlighted that fishing organisations do not represent all fishers given that not all fishers are members.

Greater involvement of fishers

A small number of respondents raised the view that fishers should have greater involvement in decision-making about inshore fisheries management than other stakeholders. One respondent raised the view that this is because decisions will affect fishers' livelihoods, and other stakeholders have less interest in fishing.

Need to sift and weight stakeholder groups

Similarly, a small number of respondents thought that there should be a sifting and weighting process to define those involved with inshore fisheries management decisions.

Managed in the public interest

A small number of respondents felt that fisheries are a public asset and should be managed in the public interest. A small number of respondents raised the view that inshore fisheries have not been managed in the public interest, with the large-scale sector being favoured.

Other

A range of other topics were mentioned by a small number of respondents. These included reflections on FMAC Inshore Subgroup; increased powers to regional

groups; integration with Regional Planning Partnerships; inclusion of diverse views; a need for collaboration; for stakeholders to be defined; that the current system does not work; and a reflection that the stakeholders involved may need to differ locally.

Question 14: What checks should be put in place to ensure transparency, fairness and accountability when appraising inshore fisheries management options?

A total of 69 respondents submitted answers to this question. The main themes identified in these responses were consultation and engagement; the importance of clear and defined structures; use of data; transparency; legislation and policy; monitoring and evaluation; balanced participation; enforcement; and, independent review.

Consultation and engagement

Several respondents highlighted topics related to consultation and engagement as important for ensuring transparency, fairness and accountability in inshore fisheries management. Some respondents felt the need for open consultation which enables meaningful participation, where people are listened to. Some stakeholders felt that all relevant stakeholders should be included in consultation and engagement to ensure all groups are adequately and equitably included in decision-making. A small number of respondents felt it important that the fishing industry is consulted when decisions are made e.g. to understand impacts on jobs. One respondent outlined the need for consultations to be clear, neutral and have defined timescales.

Clear and defined structures

Several respondents felt a need for there to be clear and defined structures for groups involved in inshore fisheries management. This included clearly defined and transparent membership, with one respondent highlighting "ongoing issues with west coast RIFGs about who are members and what defines membership… since day 1".

Various rules were suggested by a small number of respondents surrounding defining membership. These included:

- Membership should only include representative organisations (rather than individual interests);

- Members eligibility to join should be scrutinised;

- Members should detail who they represent and how they are funded;

- Members should detail how they make decisions;

- Conflicts of interest should be checked (including funding and governance);

- All interest groups should be represented fairly;

- Members should not just be opinion-holders, but actively involved in management or policy.

More broadly than membership, it was outlined by a small number of respondents that inshore fisheries management groups should have clearly defined decision-making processes, have clear powers, defined rules, that meetings should be well chaired and that a clear complaints and appeals procedure should be evident. According to a small number of respondents, this should enable groups to have clear responsibilities and accountability, increasing transparency and fairness. A small number of respondents felt this could be achieved by formalising RIFGs as constituted bodies with formal constitutions to hold them to account.

Use of data

Several respondents provided comments about the data used to support inshore fisheries management. A small number of respondents thought that data should inform decision-making, and that how it has informed decision-making should be clearly evident. It was felt by a small number of respondents that it is important that data used to determine management activities should be up to date and regular monitoring should occur. A small number of respondents also felt factors relating to the quality of data, including that it should be independent, neutral, and checked before it is included in decision-making. One respondent suggested that stakeholders could provide data.

A small number of respondents raised the importance of also publishing correspondence, membership lists, the outcomes of surveys and consultations, details of vessel monitoring, performance evaluations, details of termination of membership and data about populations of species. One respondent raised the view that this would potentially reduce the number of FOIs received.

Transparency

Several respondents raised the need for minutes or associated paperwork to be published publicly when deciding how to manage Scotland's inshore fisheries, as this could help to improve transparency and accountability of the decision-making process. Some respondents further detailed a need for transparent decision making, including providing information on the reasons why decisions are made, who made them, which groups were represented, what evidence was used, and who was consulted. A small number of respondents specified parts of the process which they believed should be transparent, including governance arrangements, engagement and consultation, objective setting, meeting minutes, fisheries management plans, and performance evaluations. Similarly, some respondents felt that data should be accessible and publicly available (e.g. vessel compliance and enforcement, landings, population levels) to enable transparency. One respondent felt that minutes should be published in a timely manner.

Legislation and policy

Several respondents raised the need to ensure that work in inshore fisheries management is in line with national, international and regional policy priorities. It was felt by some respondents that any work to improve inshore fisheries management needs to be accompanied by impact assessments (environmental and socio-economic), and any objectives should be in line with policy and legislation, including national and regional marine plans, the Joint Fisheries Statement, the UK Fisheries

Act and work towards Good Environmental Status and other targets. A small number of respondents specified the need for legislation to be updated to align with modern management practices and governance.

National Level Oversight

Some respondents highlighted a need for national level oversight for inshore fisheries management, with one respondent highlighting a need for "genuine determination on the part of the Scottish Government to make it happen". A small number of respondents felt that overall accountability will be down to the Scottish Government, and that the Scottish Government need to ensure transparency and fairness of inshore fisheries management. A small number of respondents highlighted the importance of having national plans and aims for fisheries management which should be set by the Scottish Government, with regional groups aligning to these. However, a small number of respondents perceived that some parts of inshore fisheries do need to be managed at a national level and not regionally, for instance licensing and to manage species which move over extensive areas.

Monitoring and evaluation

Some respondents felt that there should be regular monitoring and evaluation of any decisions made or measures implemented in inshore fisheries management, to understand whether objectives and national obligations are being achieved.

Balanced participation

Some respondents felt that inshore fisheries management should involve a balance of participants representing a range of different interests who would be impacted by decisions affecting the management of inshore fisheries. One respondent felt that there should be *"a broad spectre of people with even numbers. Not all fishing related or all environmentally minded people"*. A small number of respondents felt the need for all relevant stakeholders, with a mix of backgrounds, including other interested sectors, and a balance within fishing interests (e.g. large scale and small scale sector, not just those affiliated with associations), to be included and represented in decision-making. One respondent felt the need to limit *"'doubling up' of representation at meetings"* to ensure representative decision-making.

Enforcement

Some respondents raised concerns about enforcement of compliance of fishers with fishing regulations, calling for improved enforcement to encourage compliance. Examples given were: more visibility at sea, less obvious, more targeted, greater powers. One respondent raised concerns about enforcement more generally, including the need to enforce legislation to meet environmental targets.

Independent Review

Some respondents felt there is a need for external independent review of inshore fisheries management in Scotland, especially of regional management bodies, with a small number of participants highlighting that audits or review of decisions should take place. Respondents outlined a range of reasons that they thought that this might be beneficial e.g. to help to improve trust in the management process,

transparency, accountability, increase the equity of management decisions and to ensure decisions are consistent with relevant legislation and guidance. One respondent suggested that an independent third-party body should oversee the work of the Marine Directorate, to provide "reassurance that management decisions can be held to account".

Other

A range of other topics were mentioned by a small number of respondents. These included the involvement of local planning authorities in inshore fisheries management; learning from the IFCA model; meetings open to the public; advanced warning of meetings and decisions; communicating through the press; better use of fishery officers; increased power to RIFGs; embracing the principles of environmental economics; and, ensuring decision-making is fair.

Next steps

This report intends to represent views received within the IFMI Call for Evidence. It is not necessarily representative of the views of all with an interest in the management of Scotland's inshore fisheries, nor does it seek to respond to any of the views submitted.

This report will inform the next phase of IFMI policy development, and will be considered in addition to the individual responses, any links or attachments shared alongside these, and wider evidence available to the Marine Directorate of the Scottish Government.

Going forward, we intend to develop proposals for a new model of inshore fisheries management in Scotland. We will engage with stakeholders through our FMAC Inshore Subgroups during summer 2025 to inform the structure, including how different substructures should interact, and how we can ensure transparency and accountability throughout. We intend to bring proposals alongside the necessary assessments to public consultation in early 2026, with the intent to begin implementation in late 2026.

Appendix A: Glossary of terms

AI – Artificial Intelligence

EIR – Environmental Information Regulations (request)

FMAC Group – Fisheries Management And Conservation Group

FOI – Freedom of Information (request)

HPMA – Highly Protected Marine Area

IFCA – Inshore Fisheries Conservation Authority (used in English waters)

IFG – Inshore Fisheries Group, predecessor of current RIFG

IFMAC – Inshore Fisheries Management And Conservation Group, predecessor of current FMAC Inshore Subgroup

IFMI Programme - Inshore Fisheries Management Improvement Programme

MPA – Marine Protected Area

NGO – Non-Government Organisation

OSPAR – Convention for the Protection of the Marine Environment of the North-East Atlantic

RAI Committee – Regional Affairs & Islands Parliamentary Committee

RAINE Committee – Regional Affairs, Islands and Natural Environment Parliamentary Committee (predecessor to RAI Committee)

RIFG – Regional Inshore Fisheries Group

SEDD – Science, Evidence, Data and Digital (portfolio within Marine Directorate of the Scottish Government)

SFPA – Scottish Fisheries Protection Agency

SSMO – Shetland Shellfish Management Organisation

UN – United Nations