

Inshore fisheries

Letter from Sustainable Inshore Fisheries Trust

3 February 2025

Dear Rural Affairs & Islands Committee Clerk,

I refer to your Committee's forthcoming evidence and consideration sessions on Wednesday 5th February regarding the Inshore Fisheries Management Improvement Programme, and have pleasure in setting-out below a briefing regarding this issue.

The aim of the Scottish Government's Inshore Fisheries Management Improvement consultation is to "*consider a structure that enables a greater focus on strategic decision making both regionally and nationally*". The intention is "*to manage fishing activity within the space available*", and to share "*responsibility for management and delivery*" alongside democratic accountability, through a new structure "*based on the best available scientific data*". This represents a considerable opportunity for improvement given the lack of clarity and unscientific nature of many of Scotland's existing arrangements for inshore fisheries management.

Changes to the status quo need to be considered in the context of the most relevant Scottish and UK legislation - in particular the Sea Fisheries (Shellfish) Act 1967, the Inshore Fishing (Scotland) Act 1984, the Marine (Scotland) Act 2010, and the UK Fisheries Act 2020. Section 1 of the 2020 Act sets out a clear list of objectives which must shape fisheries management in Scotland's waters as well as across the UK, both directly and through the Joint Fisheries Statement which sits beneath it. However, any improvements also need to consider the non-statutory bodies, committees and groups with a locus on inshore fishery management which have been established over the devolution era. These bodies typically have limited powers or none, limited budget or none, constricted stakeholder participation, and overlapping and unclear remits. The most important of these are the Regional Inshore Fisheries Groups, Regional Marine Planning Partnerships, and the Fisheries Management and Conservation Group, plus the various subgroups associated with the last of these.

As the Scottish Government notes, evidence previously heard by the Committee "*reinforced that a more discrete, localised approach to fisheries management carries many benefits*", and SIFT strongly supports this, if properly legislated for, constituted, and funded.

IFMI is an important programme, and SIFT therefore recommends it be scrutinised with respect to the following issues we regard as key in order to deliver a stronger, more diversified and lower impact fleet alongside the ecological improvements such a fleet would require:

1. Scottish Ministers have explicitly committed to a transition to **low impact fisheries**. For example, the [Fisheries Management Strategy 2020-2030 Delivery Plan](#) states: "*We have continued to support opportunities to diversify inshore fisheries where possible, and, as part of our move towards a just transition, to provide additional fishing quota opportunities to inshore vessels to*

- support diversification, for example to lower impact catching methods*". Will this urgently-needed transition be one of the objectives of the IFMI process?
2. In theory, multiple non-statutory bodies have a role in setting local fisheries management policy, most notably **Regional Inshore Fisheries Groups**. However, in practice, these RIFGs have limited roles. Decisions are made by Marine Directorate and Scottish Ministers. Will Ministers commit to reforming the RIFGs, and give them the power to make byelaws alongside broadening their membership to include external stakeholders?
 3. The Marine Act 2010 set out how **Regional Marine Plans** would integrate with the National Marine Plan process, but, 15 years later, they have not been adopted. Will a date be set for when all of Scotland's waters will be covered by such Regional Plans? And will these RMPs include fisheries management?
 4. The international evidence is that **spatial management**, guided by science (for example, the characteristics of the seabed in any area) is essential for fish stock recovery and resilience. Will the IFMI process set out when spatial management will be adopted and how it will be implemented?
 5. To what extent should such spatial management only consider fisheries, or should one holistic planning process cover **all economic and environmental uses of our inshore waters**, such as marine renewables, seaweed aquaculture, etc?
 6. Which of the relevant descriptors for determining **Good Environmental Status** (as governed by the [Marine Strategy Regulations 2010](#)) will the IFMI process contribute to?
 7. Currently, Scottish Ministers can vary where and when fishing can take place by varying any vessel's licence conditions. What consideration is being given to the more extensive use of such **licence conditions** to better manage inshore fisheries?
 8. The Scottish Government committed to an Inshore Fisheries Bill almost a decade ago. Is consideration being given to addressing the current mix of non-statutory fishery management groups, with their overlapping and unclear remits, via **new primary legislation**?
 9. Fisheries management measures are often made on an opaque and ad hoc basis, and without a solid scientific basis. The example of the **Clyde Cod Box** is a case in point. Will local management measures of this sort continue to be implemented through statutory instruments, or might IFMI propose an alternative governance regime for them?
 10. Will IFMI set out how "*fisheries will play its part to **reduce emissions and help to create a low carbon economy***"? ([Fisheries Management Strategy 2020-2030, P10](#)).

Please do not hesitate to contact me if you would like any clarification or further information regarding the above.

With thanks

Yours sincerely

Charles Millar
Executive Director
Sustainable Inshore Fisheries Trust