

Gillian Martin MSP
Convenor
Environment Climate Change and Land Reform Committee
Scottish Parliament

cc: John Scott MSP

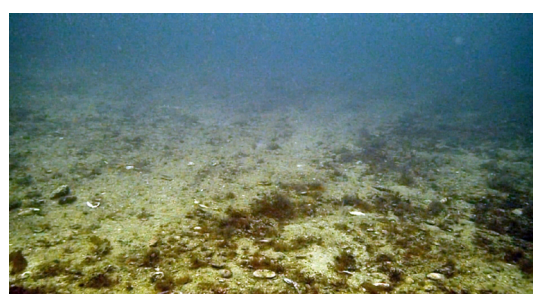
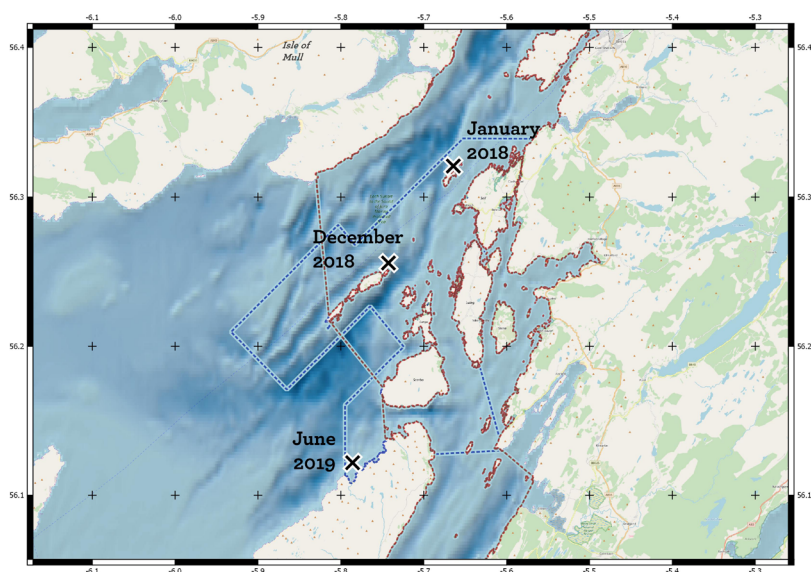
22nd August 2019

Continued degradation of the coastal marine environment

Dear Convenor

We wrote to you on 18 December 2019 to request that the Committee considers examination of the capacity of Marine Scotland to deliver the robust oversight needed to ensure our Scottish seas are adequately protected. On 6 Feb 2019 we received a response from Pauline McIntyre for which we are grateful. Unfortunately, now, six months later we find ourselves needing to write again following yet more evidence emerging of the damage caused to Marine Protected Areas by illegal scallop dredging.

In late June we became aware of the discovery of the distinctive damage to the seabed observed on the North west coast of Jura, inside the Firth of Lorn SAC and adjacent to the Loch Sunart to Sound of Jura MPA. This is the same site where illegal dredging has been reported in 2017, 2018 and in spring of 2019. Dredging is banned throughout the SAC and through part of the MPA yet, through a Open Seas Freedom of Information request, we have learned that there have been 29 reports of suspected illegal dredging and trawling in this MPA alone since 2015. Divers visited the site in early July and recorded footage of damage. Please see the map and imagery below. The boundary between dredged and non-dredged ground is clear.



Above: Map of locations of recent dredge damage recorded in Firth of Lorn SAC (boundary of SAC marked blue, MPA marked red).

Top and bottom right: Recent dredge damage recorded in to the North West of Jura, inside the protected area, June 2019.

In mid July we also became aware of a scallop dredge boat witnessed near the Summer Isles, around five miles inside the boundary of the MPA, which is entirely closed to dredging. In late July divers again took to the water to search for evidence of damage. Again they found devastation on the seabed, in shallow waters around Eilean Dubh.

Such ongoing damage is undermining Scotland's protected areas and any strategy for recovery of our seas more generally. Despite commitments from Scottish Government (in the 2015 Inshore Fisheries Strategy, Government committed to roll out vessel tracking by 2020), Scottish Ministers (in October 2018 Fergus Ewing committed to support the roll out with £1.5m) and votes from Scottish Parliament (in December 2018 Parliament "call[ed] for the use of robust vessel tracking and monitoring technology on all Scottish fishing vessels"), these incidents are neither being properly enforced or deterred.

In your April 2019 response you stated “We are also hoping to do some work in the near future on marine issues. Whilst the Committee’s exact approach and has yet to be agreed, it is likely that this will take place in March or April of this year.” We appreciate your correspondence with Ms Cunningham regarding this issue, but remain of the view that this is urgent and of such importance that the committee examines it in more detail and with some urgency.

The Marine (Scotland) Act 2010 requires that public authorities exercise their functions in ways that best further the stated conservation objectives of an MPA. Ensuring compliance with the Firth of Lorn Inshore Fishing Order and Wester Ross Marine Conservation Order is clearly a function which Marine Scotland should exercise effectively to best further the objectives of the MPA. However, we conclude this duty is being failed to the serious detriment of Scotland’s marine environment and the health of our fisheries. We ask that you urgently consider this issue.

The signatories to this letter stand united in their support for urgent action such that our marine environment can recover and our inshore fisheries flourish once more for the long-term benefit of Scotland and its people. We would welcome the opportunity to discuss these issues with you further or provide additional evidence in support of our concerns.

Signed by,



Angling Trust



Argyll District Salmon Fishery Board



Ayr Angling Club



Blue Marine Foundation



Blue Planet Society



Centre for Human Ecology



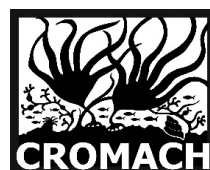
Coastal Connection



Community Association of Lochs and Sounds (CAOLAS)



Community of Arran Seabed Trust (COAST)



Craignish Restoration of Marine and Coastal Habitat (CROMACH)



Eigg Environmental Action Group



Ethical Shellfish Company



Fairlie Coastal Trust



Fauna & Flora International



58°North Scottish Seaweed



Fish Legal



Friends of the Sound of Jura



GalGael Trust



Keltic Seafare



Knoydart Foundation Ranger Service



Loch Visions



Lochnell Oysters



Mull Charters



National Trust for Scotland



Nourish Scotland



Oban Sea School



Ockran Oysters



Open Seas



Orkney Skate Trust



Project Seagrass



Salmon Aquaculture Reform Network Scotland



Save Seil Sound



Scottish Creel Fishermen's Federation



Scottish Federation of Sea Anglers



Scottish Scallop Divers' Association



Scottish Sea Angling Conservation Network



Scottish Sub Aqua Club



Sea Change



Sea Freedom Kayaks



Sealife Adventures



Skye and Lochalsh Environment Forum



Skye Communities for Natural Heritage



South Skye Seas initiative



SubSeaTV



Sustainable Inshore Fisheries Trust



WRASFB - Wester Ross Area Salmon Fishery Board