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An Tobar
Lerags
Oban
Argyll
PA34 4SE

9th April, 2008.

Richard Lochhead MSP
The Scottish Parliament
Edinburgh
EH99 1SP.

Dear Sir,

Lamlash Bay – Exclusion Zone Pecten Maximus (Scallops)

1.0 I am a commercial scallop Diver. I am dismayed by and object to the Proposals as they currently appear to us, to create a NO TAKE ZONE in Lamlash Bay and Holy Island, Arran.

I wish my objections to be formally minuted, having just found out the extent to which we will be excluded from this fishery. As a matter of courtesy we will copy this letter to our own MSP and to other scallop divers who have an interest in its subject matter.

2.0 Our own record of conservation.

At various times over the last ten years, I have been extensively quoted in the National Press (Glasgow Herald), Trade Press (Fishing News), recent private correspondence with Professor Michael Kaiser, advisor to the Scottish Parliament, and on Radio and T.V. on the vulnerable nature of both the species (Pecten Maximus) and its' habitat. I and most other scallop divers have long recognised that a need for some form of fisheries management was required to protect what remains of this vulnerable fishery. Everyone of us is committed to playing a positive role in such a management scheme.

However, total exclusion, such as that proposed at Lamlash does not take into account how vulnerable our small businesses are to being destroyed if account is not taken of the limited geographical areas we can safely fish in Loch Fyne, our traditional winter fishing ground.

- We operate from small vessels which required sheltered waters, particularly in the winter time.
- Lamlash Bay offers the only shelter from Northerly or North Westerly winds.
- For more than 10 years we have fished in Lamlash Bay for Scallops.
- We have done so in a way that is respectful of both the species and its' habitat.

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Our records show that this year we have fished at Holy Isle for approximately 56 days. This is typical of our winter work.

Had we been causing significant damage to the stocks at Holy Isle, which I have personally fished/dived for more than 20 years, those stocks would have fallen far below commercially viable levels many years ago. The areas we fish cannot be fished by scallop dredgers. There are 6 and 10 ton Admiralty mooring blocks scattered over the area, with 100 mm. (4 inch) mooring eyes attached to scrap 75 mm. (3 inch) wire. Presumably this is boom defence debris from World War 2. This debris keeps the dredgers at bay. We hand pick the larger clams from among the stock of other sizes of clams. Effectively, this area has been a conservation zone since 1945!

All the above statements are verifiable by written records.

- Our landing records will show that the vast majority of our clams are 12 mm. larger than the legal minimum, thus further conserving breeding stocks.
- The hand-picked diver method has little, if any, impact on the sub-sea environment or species habitat.
- Our clams are landed to a licenced buyer.
- A movement order is produced and filed for every landing.
- The daily launch and recovery of our boat is recorded and charged by Tarbert Harbour Authority.
- Every payment by the buyer is either by traceable cheque or Bank Transfer.
- Our diving operations are carried out constrained by the relevant H.S.E. Code of Practice.
- Our vessels are licenced to the required V.C.U.s
- Our vessels are equipped and maintained to the relevant M.C.A. Standard.

In short, we operate legitimate, albeit, small business.

As C.O.A.S.T.S proposals stand at Lamlash/Holy Island, those businesses will require to cease operating 5 months of the year.

Does the Scottish Parliament intend to compensate us adequately for the loss of this revenue stream.

If so – how?

Or, can the proposals not be modified to allow limited scallop diving operations on the shore of Holy Island for a set number of days, or for a set quota allowed to those diving firms who can prove a track record of having done so.

I would strongly suggest that the “Open” period be ONLY in the winter months October – March and that the minimum size allowed to be hand-picked is increased to 112mm. from the current 100 mm.

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Please be assured, this is not a case of “NIMBY”. We are as passionate about the sea, the coast, the underwater environment and our target species as any member of COAST. Otherwise we would not be in the job we are in, nor have invested in complying with every facet of regulation demanded by your department.

Yours faithfully,

Liam Griffin
Managing Director,
Hydrotask Ltd.

cc. Jim Mather, MSP
Prof. M. Kaiser
M. Tye
Dirk Campbell
Peter Guy
David Stead
Et al.

