

CONSULTATION QUESTIONS

Q1. Do you agree with the recommended list of Priority Marine Features as the basis for targeting future marine conservation action in Scotland's seas?

If your response includes a suggestion to amend the list, please indicate the specific species and habitats that your comments apply to and, where possible, provide or reference any evidence or data sources which have influenced your comments.

Yes No

Mallaig and North-West Fishermen's Association Limited (MNWFA) are pleased to be able to respond to this consultation.

As a member of the Scottish Fishermen's Federation (SFF), MNWFA have participated in the development of a joint response on behalf of the constituent members of SFF. This response will be delivered by SFF.

MNWFA do not agree with the recommended list of Priority Marine Features as the basis for targeting future Marine Conservation action in Scotland's Seas. We recommend that the list be amended to exclude the commercially important species listed below;

- Anglerfish
- Atlantic halibut
- Atlantic herring
- Atlantic mackerel
- Black Scabbardfish
- Blue Ling
- Blue Whiting
- Cod
- Greenland halibut
- Horse Mackerel
- Ling
- Norway Pout
- Round-nose grenadier
- Saithe
- Sandeels
- Sandy ray
- Whiting

It is our belief that the inclusion of these species does not meet with the guidelines listed in the background paper "Planning Scotland Seas – Priority Marine Features". In addition to this we also object on the basis that the management of these commercially important species falls within the remit of the European Commission (EC) based on the scientific advice of the International Council for the Exploration of the Seas (ICES) and that an additional level of management or bureaucracy is not necessary or desirable.

In addition to this, the Marine Strategy Framework Directive is aimed at providing the relevant mechanism (regulation and direction) for managing these stocks to Good Environmental Status (GES). Within the factsheet provided by UK Administrations (Marine Strategy Framework Directive Fact Sheet 4) we strongly believe the following statements support our view that an additional level of bureaucracy is not required;

- In relation to fisheries management measures, existing policies and mechanisms will be used to achieve the proposed targets, which are consistent with the UK's position on reform of the CFP.
- These targets are entirely consistent with the Government and Devolved Administrations' existing approach to fisheries management, where we have already committed to achieving sustainable fisheries with stocks fished within a species' Maximum Sustainable Yield.

MNWFA confirm that the views expressed in the SFF response to the consultation on Priority Marine Features should be regarded as the views of MNWFA. With this statement in mind, MNWFA ask that that response be taken into account in addressing any further questions in this consultation.

General

Q2. Are there other issues that have not been highlighted in this consultation that you would like to mention?

Yes No

MNWFA refer to the SFF response on Priority Marine Features.