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29<sup>th</sup>. November 2013

Marine Planning  
Marine Scotland  
Area 1-A South  
Victoria Quay  
Edinburgh  
EF6 6QQ

Dear Sir or Madam,

### **Response to Planning Scotland's Seas National Marine Plan**

The National Federation of Fishermen's Organisations, NFFO, welcomes the opportunity to respond to the Marine Scotland's Consultation on Planning Scotland's Seas National Marine Plan and is glad to note the commitment to the sustainable use of marine resources. As you are doubtless aware, among the NFFO's members are fishermen who are active in Scottish waters (just as there are Scottish fishermen who are active in the waters of the Rest of the UK); it also counts a number of Scottish members among its members. The manner in which Scotland chooses to manage its marine resources is therefore a matter of legitimate concern and it is in this spirit that the NFFO would like to make the following comments of a general nature.

Firstly, the NFFO would like to highlight the currency of the fisheries statistics used – based on the Atlas which was printed in 2010 and therefore inevitably based on figures from 2008/9 which have now been superseded by more recent ICES publications. Surely, it would have been possible to update these figures particularly since there have been a number of important developments since the earlier period. There has been a general improvement in North East Atlantic fish stocks which is not reflected in the National Marine Plan, and this has been particularly true of the East Coast of Scotland. The divergent picture between the East and West coasts is not mentioned, which presents a false overall picture. In addition, the move towards fisheries management on a multispecies basis and the implications of this for fisheries mortality in an MSY management system is omitted. The possibility that natural mortality for fish stocks is now more

important than fisheries mortality for stocks in the North Sea<sup>1</sup> (and the implications this has for fisheries management) is not taken into account. As a result, the Objective for Biodiversity should be re-examined and policies adjusted accordingly – particularly the Priority Marine Features Annex A Table 3.

Secondly, the National Marine Plan does not enter into quantitative assessments, which are left to the Regional Marine plans at a later stage. Likewise the Sustainability Assessment is established on a qualitative basis. There is, however, some attempt at quantifying costs in the Renewable Sectoral Plans where there is a brief section on Socio-Economic Assessment. It would, however, be helpful to have some clarification as to who is included in the assessment. Throughout there is reference to “all users” or “marine users” but it is unclear whether this refers solely to Scottish users/fishermen, or whether other UK users who are active in Scottish waters are included or not (and the same is even more true of other European users who have historic rights and quotas to fish in Scottish waters). Some clarity on this point would be appreciated.

Thirdly, and following on from the previous point, whilst reference is made to Scottish and UK law as the basis for the National Marine Plan, it is noteworthy that no mention is made of the EU’s proposal for a Directive establishing a framework for maritime spatial planning and integrated coastal management which was published in March 2013. It is to be hoped that in the future, when the regional spatial plans (which will involve the resolution of real conflicts among users) are drawn up, that Scotland will implement the proposals relating to Common minimum requirements for maritime spatial plans and integrated coastal management strategies, Article 6, and Specific minimum requirements for maritime spatial plans, Article 7, and Public participation, Article 9. In this way, all stakeholders (including non-Scottish stakeholders) would be involved in the process from an early stage which would undoubtedly confer greater legitimacy on the decisions taken.

Fourthly, in the Sustainability Appraisal, Part D, of the sectoral plans for the Renewables Offshore industry it is noteworthy that commercial fishing, although listed in all other areas, is not listed as being among the cumulative issues to be of particular significance in the South West where Northern Irish vessels are active – which would tend to indicate that non-Scottish interests were not taken into account.

The NFFO appreciates that a National Marine Plan for Scotland should reflect Scottish interests and that as it stands the plan is concerned with setting high level objectives and policies and does not concern itself with the detailed processes for resolving conflicts among users.

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<sup>1</sup> ICES, Advice, June 2013, Book 6, Section 6.3.1, North Sea Multispecies considerations for the North Sea stocks.

Nonetheless, it is in the interest of both Scotland and the Rest of the UK to continue to work together to optimise our mutually beneficial use of marine resources.

Yours faithfully,

Elizabeth Bourke  
Policy Officer