

Western Isles Fishermens Association
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Andrew Kent
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Dear Mr Kent

SEAL HAUL-OUT SITES

Our Association has considered the consultation paper which identifies a total of 23 seal haul-out sites in the Western Isles area, plus the existing SACs for grey seals at the Monach Islands and North Rona.

The fishing industry is a major employer in the most fragile areas of the Western Isles, in particular, in the Uists and Barra where few alternative employment opportunities exist.

Shellfish taken from the inshore waters accounts for nearly all landings into the Western Isles by value. Those fisheries have co-existed with increasing grey seal numbers over many years and there has been no conflict between the inshore fisheries and seals.

We couldn't support any restrictions being imposed on the fishing industry in the vicinity of the sea haul-out sites and would request more information on the range the designation will extend to into the sea around the haul-out sites. Furthermore, innocent right of passage must be maintained through recognised navigational channels used by vessels when travelling from East of Uist to West of Uist to access their fishing grounds.

We would propose that Marine Scotland raise awareness of best practice guidance for minimising disturbance to seal haul-out sites, so that people who are unfamiliar with the area are made aware of site locations and are aware of some code of conduct when in close proximity to seal haul-out sites.

CONSULTATION QUESTIONS

General questions

Question 1: Do you consider that the overall number of seal haul out sites proposed at national/regional/local level represent a reasonable balance between seal conservation and other sustainable activities around the Scottish coastline?

WIFA is of the view that the sites proposed are reasonable. However, it must be made clear that designation of any sites should not impinge on future fishing activities in the vicinity of the seal haul out sites. A sensible balanced approach must be considered for the overall marine environment and the sustainability of fish stocks must be given priority. Large increases in predator numbers should be controlled to prevent over-exploitation of fish stocks in more inshore fishing grounds. White fish effort has been virtually closed due to catch composition rules due to West Coast emergency cod recovery measures at the time when seal populations have been increasing with no management in place to control numbers.

Question 2: Do you consider that additional sites should be included at national/regional/local level and, if so, why, how many additional sites and which sites?

No

Question 3: Do you consider that fewer sites should be included at national/regional/local level and, if so, why, how many fewer sites and which sites?

Haul out sites located within recognised navigational channels, used by fishing vessels to gain access to fishing grounds from East to West of Uist, should be excluded if any future restrictions are to be imposed on access for safe navigation passage to gain access to fishing grounds.

Question 4: Do you agree that existing Special Areas of Conservation for seals should be added to the list of seal haul out sites being considered for possible designation?

Yes. Providing that no restrictions are imposed on fishermen who live on the Monachs during their weekly fishing operations. They stay there rather than incur the additional expense of time and fuel in steaming home on a daily basis.

Question 5: Do you consider that particular national or regional level activities might represent a potential risk of harassment to seals on haul out sites in general?

No. The fishing industry and all its activities has co-existed in harmony with seals over generations.

Question 6: Do you consider that particular local activities might represent a potential risk of harassment to seals on particular haul out sites included on the list?

No.

Question 7: Do you have any views on whether the boundaries of particular haul out sites included on the list might be revised ?

We have already commented on sites located in navigational channels and right of innocent passage must be maintained at all times. We are not aware of any fishing activities that could present any problems in the vicinity of the haul out sites and fishing activities must remain unhindered in future around seal haul out sites.

Equality assessment

The Scottish Government must ensure that any policies that it implements do not unduly discriminate against persons defined by age, gender, disability, sexual orientation, race and religion and belief. We would welcome your views on whether you believe that any of the propositions set out in this consultation paper will unduly impact on any of these groups mentioned.

Not aware of any impact.

In conclusion, the inshore fishing industry has developed in harmony with seals in the marine environment and we see no merit in imposing any restrictions on inshore fishing vessels that all fish for shellfish with static gear in close proximity to sites that have been recognised as possible sea haul –out sites.

Please contact me if you require any additional information.

Yours sincerely

A handwritten signature in cursive script that reads "Duncan MacInnes". The signature is written in black ink and is positioned above the typed name.

Duncan MacInnes
Secretary