

## **Statement from the Clyde Fishermen's Association to The Ferret on 4 March 2022**

From the outset we would state that we are a mixed fishermen's association (static and mobile gear fishermen) and we strive to do our best in respect to sustainability. We were the first and only association in Scotland to agree to a No Take Zone, we helped to inform MPAs in the area and over 20 years ago our fishermen requested the cod box themselves. We have also led on issues such as the Sound of Jura Voluntary Closure and have proposed sustainable management papers and policies to the IFG which have covered topics from scallop management to minimum landing size work. We do our level best to be sustainable, we have perhaps tried to be more progressive than many other regions and we have a record of proof on this.

From the CFA perspective we had visited a number of Nordic countries and were very impressed by their reflexive ability of local fishing boats to work with scientists and government to create real time data which helped to inform sensible and sustainable policy. We were painfully aware that there was very little resource at a Marine Scotland level to conduct science in the area, and this is not a criticism it is merely a statement of fact, and we wanted to help. Indeed we needed to help, as we were also very aware that the lack of neutral science was leading to assumptions and campaign/PR led initiatives rather than a factual approach. For example please have a look at this clip released by SIFT/Revive the Clyde for details. [Revive The Clyde - YouTube](#) Clearly this is genuinely not factual, there was and still is fish in the Clyde, but a lack of data was creating a lack of understanding about what exactly is happening in the Clyde. We did however know that the biomass of fish has increased 4x in abundance to that of what it once was in the 1930's and 1949's based on Prof Heath's work from 13 years ago. We need more current overviews looking at temperature and species interaction/predation as well as fishing patterns. Indications from some of our boats are that bottom temperature in the Clyde is at 8 degrees at the moment (Feb), as Prof Mike Heath explained cod spawn/prefer 4 to 7 degrees.

Our fishermen had observed other patterns they wanted to explore. Of course they were aware fish are in the Clyde, but they were making every effort to work on selective gear (300sqm panels) to ensure they were avoiding catching fish, and this led to a very low observed bycatch in the Clyde of cod. However selectively avoiding catching fish also means that the landing data is very low or nil, this is not because fish are not present in the marine area region, it's because there is no quota to fish for these species generally, so fishermen avoid catching them. We have often witnessed groups use landing data to correlate to marine stock levels, when this is more about catching policy than stocks.

The fishermen were also aware that the new Arran MPA had been formed, and they were keen to provide some kind of data in advance of the roll out of this project, especially as we want to help provide a realistic and neutral picture which benefits all. If there had been no studies at all until a few years after the MPA was in place then the fact that fish were indeed present could have been considered as a direct result of the MPAs, when in reality a study of what was already in the area first could help to avoid any false positives. It may well be the case that the MPA has helped, but the only way we can really tell is to have at least some data in advance.

The fishermen were also aware that the behaviour of cod seemed to be changing in their opinion. For example that it seemed to them that cod in the Clyde were swimming higher in the water column than might have previously been expected. There are many theories as to why that could be the case, and its well known that this can vary from Fjord to Fjord in Norway.

As an association we were very aware of the campaigns ongoing in the Clyde and how contentious they can be, and although we could have pursued science ourselves, as many groups such as COAST have in the area, we were aware that it would have faced a critic of potentially being "partisan", so we agreed that we wouldn't pursue science projects without working with a neutral university and Marine Scotland. We approached a number of Universities and Marine Scotland and this led to an agreement on how the project would progress in partnership. The University, Marine Scotland and

CFA worked on issues such as arranging the correct gear, identifying random stations, arranging derogations etc.

Our key role as CFA was really to provide the vessels and fishing crew, all of the partners played a role in making this happen and resourcing the project in staff time and co-ordination. It was always understood that this was a very limited small scale exploratory project, I don't believe any of the partners considered that the limited work would answer all of the questions stakeholders may have on the stocks. It was entered into with good faith and good intentions on all sides. It was not designed with the objective of anything more than trying to work together to improve local data and establish working links in the field of research.

The project it was extremely useful as fishermen, scientists and government had the opportunity to constructively work together and understand each other. They spoke to each other about theories and issues, and how they might work on concerns going forward. It was very preliminary and explorative. As I said in Parliament, I personally believe we would really need more intensive data and longer time frames to start identifying patterns, but that really is a question for scientists as opposed to myself. This was a good start, a beginning. After the trials were done there would be a wash up meeting and the results discussed and text agreed, no partner released any data until these wash up meetings took place, which was sensible and fair. Going back to 2016/2017/2018 the links to the reports were then placed on the Marine Scotland website, but the website has since been rejigged. The CFA posted short films of the trials. There are 4 cruise reports in total. The last trial took place in 2018, the report was circulated to partners in draft in late 2019. The expectation was that there would be a meeting to discuss and sign off in the following weeks/months, however with Covid and Brexit hitting at the same time Marine Scotland understandably didn't have the resource to engage in further trials or meet to sign off the work. From our part we did continue to enquire about meeting on the Cod Trials regularly, but this wasn't possible at the time for Marine Scotland. We therefore stopped developing new trials as we wouldn't attempt to do them without the partners originally involved, to maintain neutrality. As explained we wouldn't publish anything without Marine Scotland and St Andrews

University first meeting and agreeing to the contents of the report. We actually never did publish the reports before, as I stated it was a link on the MS website originally. However this may change in going forward. I did pass copies of the signed off report out on request though, there was nothing to hide.

When Open Seas requested a copy of the last cruise report, CFA explained it hadn't been signed off yet. This was the response:

*Hello \*\*\*\*,*

*No problem at all.*

*We'll all just really have to wait until everyone involved gets together to review and the report is released. I'm not a representative of the neutral scientists involved, and I wouldn't be keen to say anything until its official from them and MS.*

*However what I can say is that we are doing our best to see this process advance, and that we do understand the delay for issues have been out with anyone's control. We obviously would like to see much more neutral science as well for an informed picture longterm.*

*The prior reports were on the Marine Scotland site when they were released, I believe Dr David Bailey had referenced them previously so they have been circulating and should be available publically when google searched.*

*Thanks again,*

*Elaine*

The CFA did write to MS that this correspondence wasn't an attempt to pass the buck, but we wouldn't send anything out until MS and St Andrews had the opportunity to follow process and meet up to discuss the report as we had all initially agreed at the start, and we believe this was shared for context with the MS team now engaging on the reports. We also acknowledged that reasonably

Covid and Brexit had slowed the whole process, we have no animosity regarding genuine resource restraints. Regarding the internal MS emails, that is for MS to comment on.

Regarding the comment from SIFT,

*"It turns out, incredibly, that Marine Scotland has been making policy on the back of documents that it doesn't possess. That applies not just to this year's fiasco: Marine Scotland have been referencing industry data they've apparently not even seen for years.*

*"These non-existent reports were also coming from a highly partisan source. Simply accepting the word of one group of stakeholders without effective diligence suggests Marine Scotland cannot be relied upon to make objective decisions about the long term management of Scotland's seas. The public, and quite possibly Ministers too, have been given a misleading picture of what is going on in the Clyde. Peoples' livelihoods and the fragile health of Scotland's marine environment are directly affected by these decisions."*

It's probably worth pointing out that some of the reports had been signed off years ago by scientists and MS. Not the last report for reasons explained (*delay due to Covid and Brexit*), but the earlier ones had been. However we can't speak for Marine Scotland in respect to the data/reports they used to make decisions.

We refute the claims that the reports come from a highly partisan source. The data collected came primarily from St Andrew's University/observers and was based on a trial station design agreed between the University and MS staff. The fishermen do not write the science, they provided the vessels and crew and the CFA helped with project co-ordination.

We believe that more current and frequent science is required to help inform decisions, and we believe that fishermen, scientists and Government should work together to feed into this work, as is

standard in countries like Norway. We are not criticising any partners involved in the process for it unavoidably taking longer than we might have all hoped, we all understand the pressures the last few years have brought globally. Constructive work is underway to ensure the final report can be released shortly.

We should also note that the revision of the closed area closure was based (*as we understand it*) on Marine Scotland's data and focused on sediment type, this would not be the same data as the CFA/St Andrew's/Marine Scotland report, however this should be checked with Marine Scotland.

We very much hope in moving forward more neutral science on the area can be conducted. We feel it is essential for making informed management decisions about the marine environment and fisheries. We feel there has been much misunderstanding from some parties about the scope and intention of this work.

We genuinely feel this was an example of a positive "first step". Many organisations conduct science in the Clyde, there are even citizen science projects which help to inform policy, and we are somewhat surprised at the attention some have focused on this positive but small, limited and now somewhat dated study. Similar attention has not been focused on the science conducted by organisations such as COAST, who have recently just received a government grant for a boat which will be used for surveys.

We want to be helpful and fair partners, and we want to work with government and neutral scientists to assist whenever we can, and we believe in good will that most partners will feel the same.