



Wester Ross Fisheries Trust

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Marine Conservation
The Scottish Government
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Victoria Quay
Edinburgh
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18th January 2016

Dear Sir / Madam,

Thank you for the opportunity to comment on the following:

The Wester Ross Marine Conservation Order 2016: Consultation Draft – 17th December 2015. <http://www.gov.scot/Resource/0049/00491345.pdf>

Our views are as follows:

(1) We fully support the ban on dredging and beam trawling throughout the whole Wester Ross MPA in support of the conservation objectives for listed habitats and features within the MPA. This ban will foster gradual recovery of maerl and other firm ground biogenic habitats of high value for biodiversity and as potential breeding and nursery grounds for finfish (e.g. herring) and shellfish species of commercial importance.

(2) We accept, as a compromise, the intention to continue to provide access for smaller demersal trawlers within the areas described under Schedule 1 and Schedule 2, despite our view that this is likely to continue to adversely affect the 'burrowed mud' habitat and the prospects of finfish recovery within the area.

We accept this measure as a means of providing continued access for smaller Wester Ross based trawlers to continue to fish for nephrops within the area.

However, this measure is likely to affect the prospects of recovery of cod, haddock, whiting, ling, plaice, turbot, halibut, skate, thornback ray and other finfish species which we would like to see recover within the area. This is because these species, some of which are believed to breed within the area (e.g. skate), can be caught as bycatch, or if there is partial recovery of some stocks, they may in future be targeted and depleted by demersal trawlers within the MPA.

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We would like to see a recovery of these species within the MPA to the high levels (prior to revocation of 3-mile limit in 1986) where a line fishery, including sea angling for large fish, could again be sustained within the area. This would be of greatest value to the local economy and more broadly. Our aim is the recovery of a healthy and productive ecosystem and fisheries of higher overall value to the local area and to Scotland.

Therefore, providing continued access for demersal trawlers, especially to the inshore fishing areas described in Schedule 2 Articles 2 and 4(4)(c), is not, in our view, in the best long-term conservation interests of the MPA, nor the fisheries and the economy of communities around the local area.

We would recommend that access by demersal trawlers to these inshore areas is time-limited and reviewed after a period of 5 years or sooner.

Demersal trawlers which have not fished in these areas in the past should not be given access to these areas in the future; this could be achieved via a permit system.

We would recommend that measures are put in place to ensure that trawlers fishing within the MPA record all finfish bycatch to enable monitoring. Finfish species which are likely to survive capture should be released (e.g. skate and rays). Bycatch should be reviewed on an annual basis and the information made available to interested parties.

As a condition of access for all commercial fishing boats (creel, trawl, diver, line) we would recommend that all boats are fitted with a GPS tracking device which is switched on at all times in order to be able to record and monitor fishing effort within the MPA.

Please let me know if you have any questions or comments relating to this response.

Many thanks,

Yours sincerely,

Peter Cunningham

Biologist