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Mr David Nairn

Your ref:
Our ref: 2019/0025376
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Dear Mr Nairn

Thank you for the letter of 22nd August 2019 to the First Minister, in which you raise concerns about alleged illegal fishing in Scotland's Marine Protected Areas (MPAs). I have been asked to respond on her behalf.

My colleagues in Marine Scotland Policy have already outlined our commitment to safeguarding our shared marine resource in previous correspondence, and so I will not labour that point further. However, I would be pleased to address the concerns of you and your signatories.

I am glad that you were able to attend the compliance seminar in Oban on the 29th August. I know that our Compliance team took a great deal from this event and look forward to continuing dialogue with those who attended. I hope that you and your fellow attendees recognise the high evidential standards that require to be met when taking cases of suspected infringements forward and the lengths that Marine Scotland Compliance go to in this capacity. I would encourage you to report any evidence of illegal activity to Marine Scotland.

Our response to you of 21st January 2019 reflects Mr Ewing's commitment to deliver appropriate vessel tracking in line with the 2015 Inshore Fisheries Strategy. This vital

programme has not slipped as a Scottish Government priority and is on track. However, you will appreciate that this is a highly complex body of work that, in order for us to deliver effectively, must be compliant, provide public value, and be carried out with the buy-in of our stakeholders.

The Modernisation of Scotland's inshore Fleet programme recognises the importance of prioritising our scallop dredgers and presents an opportunity to achieve better monitoring and governance of those vessels fishing close to sensitive areas such as MPAs. On course to realising this, our invitation to tender document outlining a framework agreement for supply and installation of appropriate technology has now been published on Public Contracts Scotland. Additionally we have created a scallop industry working group aimed at ensuring engagement and buy-in throughout the project life cycle.

Regarding the subsidiary point in your communication of 17th December 2018, referencing the Priority Marine Feature (PMF) review, this too remains a key commitment for Marine Scotland. We are currently undertaking a sustainability appraisal and will be holding a stakeholder workshop on 1st October 2019, which we anticipate will lead to a public consultation on proposed measures by the end of November.

I disagree with your assertion that important habitats and species are being ignored in this process, as is made clear in our published documentation that we intend to consider the 11 most vulnerable first. Once the current process is completed we will consider again whether the process needs to be repeated for any other PMFs.

I appreciate the acknowledgement in your correspondence of the First Minister's TED talk on GDP. The fishing quota system that Scotland has in place serves to ensure that the pitfalls of obtaining a short-term economic boost at the cost of the long term sustainability of a fish stock are avoided. Marine Scotland respects the scientific advice that we receive on fishing levels that keep us within maximum sustainable limits and manages our fisheries to ensure that we do not exceed quota limits. The importance of taking a longer term view in relation to both GDP and our fisheries themselves is evident through the continued development of Scotland's natural capital - as illustrated in the recently published Scottish Natural Capital: Ecosystem Service Accounts 2019.

Should you wish to meet and discuss current programmes, integral to our mutual desire to protect the marine environment and establish a world class model of fisheries management, I would be very happy to do so. Please contact Vanessa Brown on 0131 244 0017 or Vanessa.Brown@gov.scot to arrange a time that would be suitable for you.

Yours sincerely



Diane Buchanan
Head of Inshore Fisheries and Coastal Communities