



Consultation on Scotland's Future Catching Policy

Response from Stop Climate Chaos Scotland June 2022

Introduction

[Stop Climate Chaos Scotland](#) ("SCCS") is a diverse coalition of over 60 civil society organisations in Scotland who campaign together on climate change. Our members include environment, faith and belief groups, international development organisations, trade and student unions and community groups. We believe that the Scottish Government should take bold action to tackle climate change, with Scotland delivering our fair share of action in response to the Paris Agreement and supporting climate justice around the world.

Speaking at the Blue Carbon Conference, in Edinburgh in November 2021, Cabinet Secretary for Rural Affairs, Mairi Gougeon MSP, said:

*"There is increasing recognition across the international community of the role of the carbon stored in our seas and ocean for enhancing action on climate change mitigation, adaptation and resilience."*¹

In the light of this recognition, we welcome the opportunity to respond to this consultation on Scotland's Future Catching Policy (FCP) by means of this written submission. As our comments are strategic, this submission takes the form of a written contribution, rather than seeking to answer the specific questions in the online consultation.

Climate context

Global warming of 1°C has already taken place since the pre-industrial period, almost entirely due to human emissions of greenhouse gases. The impacts are already being felt and further emissions make these increasingly worse. The Paris Agreement aims for countries to work to limit warming to well below 2°C and to aim for 1.5°C above pre-industrial levels. The UN's Intergovernmental Panel on Climate Change (IPCC)² states that restricting global warming to the 1.5°C level would require a 45% reduction in net human-caused emissions of CO₂ by 2030, global carbon net neutrality by mid-century, and then the removal of billions of tonnes of atmospheric carbon dioxide for the rest of the century. The IPCC also stated that there are fewer than 12 years to make the necessary changes; we must therefore act now.

In August 2021, the IPCC issued the starkest warning yet about human impact on the planet, including more intense heatwaves and more extreme weather events, with some changes now inevitable and irreversible³. The UN Secretary General branded the findings a "code red for humanity"⁴. The science is now overwhelming: without concerted action we're headed towards climate catastrophe; with the poorest communities and future generations suffering the most.

"As First Minister of Scotland, I am declaring that there is a climate emergency.
And Scotland will live up to our responsibility to tackle it."

Rt. Hon. Nicola Sturgeon MSP, 28 April 2019⁵.

¹ <https://www.gov.scot/news/blue-carbon-international-policy-challenge/>

² 'IPCC Special Report: Global Warming of 1.5°C', October 2018. <https://www.ipcc.ch/sr15/>

³ <https://www.ipcc.ch/report/sixth-assessment-report-working-group-i/>

⁴ <https://www.bbc.co.uk/news/science-environment-58130705>

⁵ <https://www.ukpol.co.uk/nicola-sturgeon-2019-speech-at-snp-conference/>



In April 2019, the First Minister 'formally' declared a climate emergency⁶. This language was subsequently central to Scottish Government policy and statements – for instance, the (then) Cabinet Secretary's statement in May 2019⁷ and the 2019-20 Programme for Government⁸. It remains a key element of policy with one of the six chapters within the Scottish Government – Scottish Green Party Shared Policy Programme entitled "Responding to the climate emergency"⁹. The co-operation agreement also creates a Cabinet Sub-Committee on the Climate Emergency "to provide cross-Government leadership and coordination of efforts to tackle climate change"¹⁰.

In May 2019, the UK Climate Change Committee (CCC) recommended that Scotland could reach a net zero target for greenhouse gases by 2045 (ahead of the UK, which could meet the same target by 2050)¹¹. The Scottish Government swiftly accepted these recommendations¹² and have now legislated to secure net zero emissions by 2045, with an interim target of a 75% reduction by 2030¹³.

As indicated by the Cabinet Secretary (see above), the role of carbon stored in our seas is crucial, and thus any cross-Government approach to meeting the challenges of the climate emergency must include policies in relation to the marine environment, including fisheries. In many ways, this is recognised, such as references to blue carbon and the "Blue Economy Action Plan" in the Climate Change Plan update¹⁴ (although it is also notable that the Parliamentary scrutiny of this plan called for more recognition of and action to address blue carbon issues¹⁵).

The Scottish Government's Future Fisheries Management Strategy for 2020-2030 suggests that it will:-

*"form one of the cornerstones of the Blue Economy Action Plan. It will seek to deliver the benefits of a Blue Economy approach to the fishing industry by encouraging learning and collaboration with other marine sectors in areas of shared interest, such as skills, science, innovation, infrastructure, regulation and **the climate emergency**." (emphasis added)¹⁶*

In addition, launched at COP26, the Scottish Government has undertaken a survey to inform a workshop on climate change and fisheries. Speaking about this, the Cabinet Secretary said:

"Scotland's fishing industry finds itself on the front line of climate change and facing serious challenges. We need to take action now to ensure that a sustainable fishing industry can survive into the future. The Scottish Government is committed to working with the fishing sector to respond to the climate emergency and to ensure a just transition."¹⁷

In launching the FCP consultation, the Cabinet Secretary said:

"Now, more than ever, the spotlight is on the twin crises of climate change and biodiversity loss, which require urgent action in order to deliver change on a significant and long-lasting scale. The signing of the Bute House Agreement last year underlined our commitment to

⁶ <https://www.bbc.co.uk/news/uk-scotland-scotland-politics-48077802>

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<https://www.gov.scot/publications/global-climate-emergency-scotlands-response-climate-change-secretary-roseana-cunninghams-statement/>

⁸ <https://www.gov.scot/news/protecting-scotlands-future/>

⁹ <https://www.gov.scot/publications/scottish-government-and-scottish-green-party-shared-policy-programme/>

¹⁰ <https://www.gov.scot/publications/scottish-government-and-scottish-green-party-cooperation-agreement/>

¹¹

<https://www.theccc.org.uk/wp-content/uploads/2019/05/Net-Zero-The-UKs-contribution-to-stopping-global-warming.pdf>

¹² <https://www.gov.scot/news/climate-change-action-1/>

¹³ <https://www.legislation.gov.uk/asp/2019/15/enacted>

¹⁴

<https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/>

¹⁵

https://archive2021.parliament.scot/S5_Environment/Reports/ECCLR_2021.03.04_OUT_CS_CCPu_Report.pdf (paras 181-193).

¹⁶ <https://www.gov.scot/publications/scotlands-future-fisheries-management-strategy-2020-2030/pages/2/>

¹⁷

<https://blogs.gov.scot/marine-scotland/2021/11/23/last-chance-to-take-part-in-our-fisheries-and-climate-change-survey/>



deliver the best outcomes for Scotland's marine environment, our seafood sector and coastal communities."¹⁸

In addition to blue carbon being essential in the fight to mitigate climate change, inevitable changes in climate and the environment will also have an impact on the fishing sector¹⁹. Fisheries policy should, therefore, also plan for the adaptation of fisheries.

Yet, despite the above context and the commitments/aspirations of Scottish Government policy documents and Ministerial statements, the consultation paper does not appear to address, to consider, or propose any measure to either ensure that fisheries contribute to climate mitigation or adapt to climate change. Indeed, a word search of the consultation indicates that the words "climate" and "carbon" do not occur – even in a context-setting section or the objectives, let alone in proposed measures.

This is both regrettable and negligent. Any strategy for a "new approach to managing sea fishing activities within Scottish waters" that does not set out the scientific and policy context of climate change – including the respective 75% and net zero targets – is not a coherent strategy.

Fisheries and climate change

Fisheries, and the ways that catching policy is applied, have a number of climate change related impacts. These have been summarised thus:

"Fisheries have significant impacts on climate change through gear contact with blue carbon stores, carbon extraction in the form of marine organisms and by indirectly adding to global GHG emissions through the burning of fossil fuels. The impacts of the industry on long-term carbon capture and storage of blue carbon are therefore an important consideration regarding the design of climate change mitigation strategies. Nevertheless, the fishing industry's impact on blue carbon is commonly missed from global assessments of GHGs, not considered in marine management or climate change mitigation and largely ignored during climate negotiations. The latest breakdown of global emissions by sector for example, only considers vessel fuel use of the global fishing industry in combination with agriculture (1.7% of total GHG emissions from industry) and is not calculated to a spatial resolution small enough to benefit local management decisions.

*"Furthermore, most research that combines climate change and fisheries to date has typically focused on the threats of climate change to fish stocks rather than the impacts of fisheries on climate change. Global fisheries in their current state present the challenge of both being threatened by the impacts of climate change whilst also contributing to anthropogenic climate change. Climate-smart approaches to fisheries management are therefore needed across the fishing industry to ensure that GHG emissions are reduced, and ecological sustainability is achieved. This would help to strengthen the resilience of fish stocks and blue carbon as an important climate change mitigation tool, whilst building food security on a global scale. Nevertheless, balancing these objectives in an environment already susceptible to additional climate change impacts is no easy task."*²⁰

The above analysis, produced for WWF, RSPB, and the Marine Conservation Society, led those organisations to recommend that all governments show global leadership and put fisheries on a sustainable footing by adopting a 'climate-smart' strategy. This included:

- *"Limiting bottom towed fishing gear to protect blue carbon within current MPAs and in key areas outside of MPAs.*
- *Working to decarbonise the UK fleet including removing fuel subsidies and eliminating inefficient fleet structures.*

¹⁸ <https://www.gov.scot/news/world-leading-fisheries-proposals/>

¹⁹ <https://marine.gov.scot/sma/assessment/fisheries>

²⁰

https://www.wwf.org.uk/sites/default/files/2021-08/Pact_Media_WWF_Climate_Smart_Fisheries_Report_2021_Aug_16_V2.pdf



- *Mandate Remote Electronic Monitoring (REM) with cameras and Vessel Monitoring Systems (VMS) across all vessels fishing in UK waters to deliver increased transparency and traceability across the fishing sector to improve stock health and increase biomass.*
- *Reduce pressure from heavy, towed bottom fisheries gear and review the impact of passive gear use and whether incentives for gear changes are appropriate.*
- *Strengthen overall marine policy frameworks, such as the Scottish Government's Future Fisheries Management Strategy, with a climate change lens that focusses on tackling the climate emergency.*
- *Increase research and knowledge on blue carbon habitats, stocks, and the fishing sectors GHG emissions and blue carbon impact.*
- *Adopting these recommendations will help future-proof fisheries across the UK by bringing about the recovery of the ocean's health and help meet the triple challenge of sustainably feeding a growing population, while staying on track to keep global warming below 1.5°C and reversing biodiversity loss.²¹*

SCCS is aware that the FCP forms only one of a range of mechanisms and policies, deployed by the Scottish Government, to manage the marine environment and in particular the fisheries sector. As such, we are conscious that not all the above recommendations/issues can be addressed by the FCP. However, it is also equally true that the proposals in **the FCP could, and should, be developed with a clear understanding of these climate change issues, and as appropriate include the relevant actions to contribute to a fully climate-smart fisheries sector. At present, this consultation fails to do either.** Such actions could include:-

- stock management which ends overfishing and recovers stocks as a means to yield maximum low emission seafood from the sea.
- technical and spatial measures which end the loss of blue carbon habitats, prevent further degradation of blue carbon stores and recover sequestering habitats.
- ending the wasteful practice of discarding.

SCCS is aware that many of our members, and stakeholders beyond our coalition, will be responding to the details of the consultation. As such, we do not intend to respond to the individual questions. Our primary concern is that the consultation (and the specific proposals therein) has failed to acknowledge the context of the climate emergency – or the need for the fisheries sector to both contribute to its mitigation and adapt to its impacts. As well as not describing that context, it also fails to demonstrate how the proposals have been developed to respond – or to reference other measures being taken to address these issues.

Conclusion

SCCS welcomes the opportunity to make this written submission to the public consultation on the Scottish Government's Future Catching Policy (FCP).

Our primary concerns are that **the policy must:**

- **set out the scientific and policy context of climate change – including the respective 75% and net zero targets; and**
- **set out how policies have been developed, and will be applied, to enable the fisheries sector to both contribute to climate change mitigation and adapt to its impacts. It should propose catching policies that advance these changes and/or reference other policy mechanisms, where appropriate, that will support.**

Stop Climate Chaos Scotland is a charity, registered in Scotland, no SC039643
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²¹ <https://www.wwf.org.uk/updates/scotland-key-role-play-creating-climate-smart-fisheries>

