



Stop Climate Chaos Scotland

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Inshore Fisheries Management Team,
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(Sent by email to: inshore@gov.scot)

Dear Inshore Fisheries Management Team,

SCCS response to “Inshore Fisheries Management Improvement Programme: Call for evidence”

Stop Climate Chaos Scotland (SCCS) is Scotland's climate coalition, with over 70 diverse civil society organisations campaigning together for climate action and justice in Scotland. SCCS believes the Scottish and UK Governments must take fast, fair action to address the climate emergency, delivering our fair share of action to limit global temperature rises to 1.5 degrees, championing international climate justice and inspiring others to take action.

SCCS is pleased to respond to [this call for evidence](#) on the Inshore Fisheries Management Improvement Programme. SCCS's interest in this issue arises from the climate crisis, caused by anthropogenic emissions of greenhouse gases – and **the need to (a) protect and enhance carbon stores in the marine environment and (b) decarbonise the human activities that take place at sea** (with the same rigour as is applied to terrestrial activities). However, the need to encourage [a transition to lower carbon diets](#) also means that a marine environment that supports the sustainable production of low-carbon seafood should also be a key policy objective. The climate and policy context is outlined in the box below and it is against this background that we offer the observations that follow.

Climate context

From devastating droughts to catastrophic floods, the impact of the spiralling climate crisis could not be clearer, and those with the least responsibility for causing rising global temperatures are facing the most severe - and deadly - consequences.

Scotland has been a global climate leader. When our 2009 Climate Change Act first set targets for emissions' reductions, they were “world-leading” – and this was sustained by the 2019 Act's amendments, which set rightly ambitious targets, based on our historic responsibility, the science, and public mandate. However, on 18 April 2024, [the Cabinet Secretary responded](#) to the Climate Change Committee's latest advice, announcing a proposal to revise the targets framework and seeking to reinvigorate action. Our [analysis of the measures](#) announced indicates that they lack ambition and much additional effort is needed to get anywhere near to delivering the emission reductions needed.

Then, on 18 June 2024, [official statistics for emissions in 2022](#) revealed that the annual target for reductions was missed again – meaning that **Scotland has now missed its targets in nine of the**

[past thirteen years](#). On the following day, the [Cabinet Secretary's statement](#) confirmed that the Government's "legislative proposals on a new emissions reduction framework will include establishing five-yearly carbon budgets"; and that "the bill is introduced as soon as possible after recess". This bill has now been introduced, considered, passed and is now the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024.

The 18 April statement listed a number of welcome achievements, contributing to the 50% reduction in emissions since 1990, and reiterated the commitment to achieve Net Zero by 2045. However, it was disappointingly light on new proposals for meaningful action to ensure that emissions reductions get back on track and that the future budgets and 2045 target can be achieved. The latest [CCC Report to Parliament on Progress in Reducing Emissions in Scotland](#) sets out the current situation very well and highlights that:

- **Current overall policies and plans in Scotland fall far short of what is needed to achieve the legal targets under the Scottish Climate Change Act.** The CCC identifies risks in all devolved policy areas - transport, buildings, agriculture, land use and waste. The CCC did, however, welcome policy actions and proposals related to heating but sought a clearer timeline for the Heat in Buildings Bill.
- **The Scottish Government has delayed its draft Climate Change Plan.** A draft CCP was, previously, expected in November 2023 but has been delayed. Scotland is therefore lacking a comprehensive strategy that outlines the actions and policies required to achieve the 2030 target.
- **Most key indicators of delivery progress are off track**, with tree planting and peatland restoration rates, heat pump installations and community energy, electric van sales and recycling rates significantly so.

With the Climate Change (Emissions Reduction Targets) (Scotland) Act 2024 now passed, attention now turns to the setting of the first carbon budgets, and the production of a Climate Change Plan to meet that budget. As indicated above, there is an urgent need for faster and bolder action to deliver emissions reductions, both immediate and to be set out in the forthcoming plan.

The importance of the marine environment and maritime activities

The climate crisis has been caused by a wide range of human activities. Many crucial sectors that must be decarbonised are wholly or mainly on land (e.g. heat in buildings, land use and agriculture, much of the transport sector). However, the marine environment and maritime activities are also of importance and, notwithstanding issues related to the current inventory, must also form part of cross-government policy action to address the climate emergency.

Blue carbon

Despite the positive rhetoric and recognition of the importance of blue carbon, government plans to protect and restore blue carbon stores have repeatedly been delayed, with very little meaningful action.

In September 2022, SCCS published the briefing [Action for Blue Carbon: Protecting the marine environment to support action on climate change](#). This highlighted that Scotland's blue carbon environments [were then estimated to] store 9,636 MtCO₂-eq and sequester 28.4 MtCO₂-eq per year. This store is roughly equivalent to the total carbon stored in Scotland's land-based ecosystems and the sequestration rate is three times greater than the annual carbon sequestration of Scottish forestry. Adding emissions related to activities at sea, the wider 'marine carbon' balance is, therefore, vital to efforts to address climate change.

The briefing recommended that:

- The new Climate Change Plan (CCP) should not only refer to blue carbon and ongoing research but also include clear and specific actions to protect such carbon stores, and environmental improvements that will increase sequestration rates.
- In addition to a substantial marine section in the new CCP, we also recommend that the Scottish Government ensures more investment in appropriate research and monitoring. It should also implement a range of 'no regret' actions to protect and enhance blue carbon,

including fishing policy reform, improved management of MPAs/HPMAs and coastal management and seaweed protection/cultivation.

While the above was directed at the CCP (originally being prepared then, but now delayed to this year), **these recommendations are also appropriate for sectoral policies related to the marine environment** (which should be consistent with the CCP, and vice versa).

Of course, since the above briefing, further scientific work has added to our knowledge of this issue. This work includes the Blue Carbon Mapping Project undertaken by SCCS members, RSPB Scotland, WWF Scotland and the Scottish Wildlife Trust working with the Scottish Association of Marine Sciences. This report estimated that 244 million tonnes of organic carbon are stored within the top 10 cm of blue carbon habitats around the UK and Isle of Man (of which 152 million tonnes are in Scottish waters) and has led to [further recommendations for action](#). In addition, Scottish and the UK Blue Carbon Forums have undertaken, co-ordinated or published further research, such as that [on Fjords](#).

Given recent developments, SCCS is currently reviewing its 2022 briefing and an updated version will shortly be published. Meanwhile, it is understood that the Marine Directorate of the Scottish Government is working on the Blue Carbon Action Plan, promised by [the 2023/24 Programme for Government](#), to “improve the management, protection and enhancement of Scotland’s critical blue carbon environments”. As yet, there are no publicly stated plans for consultation or publication date for this action plan.

Maritime sectors

Various marine sectors generate greenhouse gas emissions, either from their own operations, the use of their products or by their impact on the blue carbon resource (or its sequestration potential). The key sectors include oil and gas, shipping and fishing.

In some cases, policy efforts are already in place or proposed to drive the decarbonisation of these sectors (e.g. [the expansion of the UK ETS to the maritime sector](#)). In other cases, policy is, as yet, unclear (e.g. on [a genuine, managed transition from oil and gas](#), with the Scottish Government’s final energy strategy still unpublished) or non-existent. In relation to this consultation, it must be noted that the fishing industry’s contribution to climate change relates not only to its operation (emissions from vessels, the processing/distribution of catch, etc) but also from its impact on the marine environment – particularly the blue carbon resource.

In particular, in the absence of a definitive Blue Carbon Action Plan, setting out actions to “improve the management, protection and enhancement” of this crucial resource, there are no policies in place to ensure that the activities of these marine sectors do not adversely impact on the blue carbon resource (or its sequestration potential).

The Scottish Government’s Future Fisheries Management Strategy

The foreword to the current consultation refers to this strategy, and to the proposed framework offering “*an opportunity to strengthen existing arrangements*”. In the light of this, we comment below on some climate-related concerns with the strategy, as currently stands, and hope that the proposed framework will be developed to address (and thus ‘strengthen’) these matters.

The “Strategic Context and Outcomes” section of the Scottish Government’s [Future Fisheries Management Strategy](#) quotes the same Government’s Environment Strategy’s commitment that:

“We play our full role in tackling the global climate emergency and limiting temperature rise to 1.5°C”.

It also refers to the Blue Economy Action Plan, indicating that:

*“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.**”*

Yet, despite this, the principles and outcomes of the strategy include no reference to the climate crisis or to blue carbon (and the fishing industry's impacts on that resource). While there is a welcome "overarching principle of sustainability" and two environmental outcomes, these do not acknowledge or address the protection and enhancement of blue carbon, or the need to reduce emissions from the industry.

Nevertheless, while there remains a need (for internal consistency sake) to address these principles and outcomes, it is welcome that the strategy includes a section on "tackling the climate emergency" and includes the commitment to:

"With that in mind, we will urgently work with our partners and our scientists to secure a robust evidence base and develop a firm plan to set out direct actions, including" [a number of actions limited to essentially to evidence gathering, process and fuel efficiency].

While welcome, this action must be viewed as a first step, and needs to be widened/deepened, so that the actions include proposals that will deliver real change – including those that will strengthen the protection and increase the enhancement of blue carbon.

In addition, there is serious concern at the priority accorded to this issue. Climate matters are listed as 12th in the list of 12 priority actions and are focused entirely on vessel emissions and waste issues.

These issues and concerns were also raised in [SCCS's response](#) to Marine Scotland's consultation on Scotland's Future Catching Policy in 2022.

Thus, a key part of the proposed framework must be 'strengthening the existing arrangements' in relation to action to tackle the impact of fisheries on climate – and to ensure this is focused on action to reduce emissions and to protect and enhance blue carbon.

Current consultation on an Inshore Fisheries Management Improvement Programme

The current consultation asks a number of questions related to the proposed programme and forthcoming 'framework'. We address a few specific questions below; however, our overarching response is that the programme must address the general issues described above. In doing so, it must demonstrate how implementation of the proposed framework will fulfil the relevant statutory duties related to climate change and the marine environment (see below).

Statutory duties related to climate change and the marine environment

Section 4 of the Marine (Scotland) Act 2010 states:

In exercising any function that affects the Scottish marine area under this Act, the Climate Change (Scotland) Act 2009 (asp 12), or any other enactment—

- (a) the Scottish Ministers, and
- (b) public authorities,

must act in the way best calculated to mitigate, and adapt to, climate change so far as is consistent with the purpose of the function concerned.

Section 44(1) of the Climate Change (Scotland) Act 2009, as amended, states:

A public body* must, in exercising its functions, act [*inter alia*]—

- (a) in the way best calculated to contribute to the delivery of the targets set in or under Part 1 of this Act.

(* this is defined in a manner that includes the Scottish Ministers, and hence Marine Scotland).

Inshore Fisheries Management Improvement Programme consultation: response to specific questions

4. What does not work well with the current national approach to inshore fisheries management in Scotland and needs to be improved?

Our response to this question is set out in our general observations above. Fisheries management remains poorly aligned with climate mitigation and adaptation goals and commitments made by the Scottish Government.

6. What are the most important environmental outcomes for inshore fisheries management, to you?

It should demonstrably contribute to the tackling of the climate crisis, both by the reduction of emissions from and associated with the sector as well as by the protection and enhancement of blue carbon.

8. Do you favour or oppose a potential transition to a more regional model of inshore fisheries management in Scotland?

SCCS is neutral or moderately in favour of such a model. Our support relates to the benefits of genuine stakeholder engagement, including appropriate local and regional decision-making. However, such devolution of decision-making must be accompanied by a clear, strategic framework that the regional bodies are required to work within to deliver nationally agreed outcomes, such as climate mitigation and compliance with e.g. the statutory duties referenced above.

In addition, any revised model for inshore fisheries management must require compliance with the National Marine Plan. This means that any “approval, confirmation, consent, licence, permission or other authorisation” related to fisheries must, by virtue of s.15 of the Marine (Scotland) Act 2010, generally be in accordance with the National Marine Plan. The current Plan is, of course, under review and a consultation underway on work to prepare/approve a National Marine Plan 2; this comment should, therefore, be read alongside [our response to that consultation](#).

13. What stakeholder groups should be involved and how should each feed into development of inshore fisheries management measures?

All those concerned with matters related to all of the existing and proposed outcomes are stakeholders that should be involved. As such, all relevant eNGOs should be included and, in particular, those with an interest and expertise in climate change, and tackling the crisis, should be involved.

Thank you again for the opportunity to respond to this consultation and I hope the general, and section-specific, comments above are useful – and can be taken into account as the Scottish Government develops its framework for inshore fisheries management. SCCS would, of course, be pleased to discuss these issues with Ministers and/or officials if that would be useful.

Yours faithfully,



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Stop Climate Chaos Scotland