

CONSULTATION QUESTIONS

Q1. Do you agree with the recommended list of Priority Marine Features as the basis for targeting future marine conservation action in Scotland's seas?

If your response includes a suggestion to amend the list, please indicate the specific species and habitats that your comments apply to and, where possible, provide or reference any evidence or data sources which have influenced your comments.

Yes No

Thank you for providing Marine Harvest (Scotland) Limited with the opportunity to comment on the proposed list of Priority Marine Features.

We wish to support the comments submitted by the Scottish Salmon Producers' Organisation, and provide additional comments regarding pPMF *Salmo salar*.

It is important that the science and judgements made are transparent before we are able to agree with the PMF list. Whilst the consultation document explains a detailed methodology we have not been able to locate the science on which some of the decisions have been made.

For example, having requested further information we have been advised that Atlantic Salmon are considered to be under decline or threat due to anthropogenic causes. Furthermore, Page 104 of Commissioned Report 388¹ makes claims regarding interactions between aquaculture and wild salmon. We are unable to locate any explanation or evidence in the consultation documents which support these conclusions.

It is important that decision makers clearly understand the science behind potential issues and appreciate the benefits of effective management at salmon farms before drawing conclusion on PMFs. At present, the documents provided do not prove this.

Marine Harvest also questions why the document fails to acknowledge other possible causes contributing to the decline in wild salmon. Has habitat decline, overfishing, poaching, climate change, or hydro schemes etc been considered? If not, why not? Equally if so, why does Page 104 of the Commission Report fail to acknowledge other possible causes?

We wish to reinforce the comments submitted by the SSPO relating to Grey Seals. Making the species a PMF provides an unnecessary additional statutory protection to existing statutory measures. Furthermore, the size of the existing population together with its impact on other species should be considered before inclusion in the final PMF list.

¹ Howson, C. M., Steel, L., Carruthers, M. & Gillham, K. (2012). Identification of Priority Marine Features in Scottish territorial waters. Scottish Natural Heritage Commissioned Report No. 388.

General

Q2. Are there other issues that have not been highlighted in this consultation that you would like to mention?

Yes No

Comments