



National Marine Plan

Draft Consultation

Submission from the Scottish Sports Association

The Scottish Sports Association (SSA) thanks the Scottish Government for the opportunity to respond to this draft consultation. Should any queries result from our response, or if further engagement with the SSA or our members would be beneficial as this process develops, please do not hesitate to contact us.

The SSA is the independent and collective voice for Scottish Governing Bodies of sport. We represent their interests and currently have 52 full members and 21 associate members. The governing bodies of sport are responsible for the governance, development and delivery of their individual sports and provide a formal structure for the over 900,000 individuals in Scotland who are members of one of Scotland's 13,000 sports clubs. Most of these organisations are run on a not-for-profit basis and are managed by volunteers. They provide coaching, competition and youth participation development opportunities for their local communities and most of the 195,000 people who volunteer in sport do so within the club structure.

The SSA has compiled this response following consultation, as usual, with our member Scottish Governing Bodies (SGBs).

As part of the SSA's discussions with our members, in relation to Priority Marine Features, the SSA has compiled this response following consultation with our Outdoor Pursuits Group, which contains representatives from 20 of our member Scottish Governing Bodies (SGBs) involved in outdoor and adventurous activities.

These inputs in some cases involve clarification of terms and in others are directly linked to ensuring the discussed plans optimise and do not inhibit the practicing of sport in and around Scotland's marine areas and the substantial economic and social benefits that come from this.

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

Comments

General

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

Yes No

Having a single list is welcomed.

It is stated that 'The list will be used to support advice on marine biodiversity, guide future research priorities and help deliver marine planning and licensing systems set out in the Marine (Scotland) Act which delivered new powers to protect other habitats and species of national and international importance.'

Clarification of what this means in practice and what status of protection is afforded to those on the list would be welcomed.

Some of the Priority Marine Features (PMFs) may already be adequately protected (part of the discussion during the Marine Priority Areas process considered this – for example, seagrass beds were considered to be adequately protected under Natura 2000 designations); some are so rare at a European level that all occurrences are likely to be designated, however, others are more widespread.

Is it expected that if one of the PMFs occurs in an area for which a Marine Licence is being sought, then that by itself would prevent consent being given unless it could be demonstrated that the activity would do no damage to the feature (the Habitat Regulations Assessment test). Conversely, what is the status of biotopes and species that are not on the list?

Our members would appreciate clarity on this in order to be informed should they be involved in the Licencing process. Detailed guidance on the procedure for conducting Habitat Regulations Assessments is also requested.