

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

WDC welcomes the opportunity to comment on the contents of this list of Priority Marine Features. We have also welcomed involvement in the stakeholder process which led to the compilation of the list.

However, WDC do not agree with the recommended list of Priority Marine Features, as it is currently incomplete.

WDC supports the idea of a list of Scottish PMFs, filtering the many national and international lists for those species and habitats which are important in Scotland and which it is thought that conservation measures could be successful. However, we believe that the current PMF list and the resulting subset used as MPA search features, could potentially harm conservation efforts for Natura 2000 species through their omission.

We are very pleased to see the range of marine mammals on the PMF list, including both grey and harbour seals. We would again draw your attention to our concerns regarding the distinction between features suitable for protection within nature conservation MPAs and those on the wider PMF list.

The PMF list should be expanded to include a wider range of cetacean species offshore. Blue and humpback whales should be included in the list. Whilst the typically offshore distribution of these species makes them difficult to study, regardless they are populations that could benefit from conservation efforts.

General

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

Yes No

WDC are concerned that the PMF list is not also used to focus research and monitoring in the marine environment as well as conservation action. The selection criteria relied on the idea that this was a list of species and habitats that could

respond positively to conservation efforts. Nationally important species that were threatened or declining due to climate change or environmental decline did not necessarily make it on to the final list. It is important such species are not excluded from research and monitoring effort.

Clarity around the purpose and intention of the list is required.

Finally, each feature is identified as being Offshore, Inshore or Both. We recognise that the term for each feature is provided as a general guide to their usual distribution. It should be made clear that any protection, planning or strategies that relate to the listed features should occur throughout their range and not just for those areas listed.