

Marine Planning
Marine Scotland
Area 1-A South
Victoria Quay
Edinburgh
EH6 6QQ
12 November 2013



1st Floor
30 Park Street
London
SE1 9EQ

Telephone: 020 7260 1785

Email: richardbird@ukmajorports.org.uk

Dear Sir/Madam

www.ukmajorports.org.uk

SCOTTISH MARINE PLAN

The UK Major Ports Group welcomes the opportunity to respond to this consultation.

UKMPG represents the 9 groups listed below who operate 42 ports throughout the UK. UKMPG ports handle some 70% of the UK's international trade by volume which makes us major players in the UK's economic performance and international competitiveness. Our members invest upward of £300m in new and improved port facilities annually and contribute substantially to UK employment and GDP. 3 of our members are based in Scotland ie Forth Ports, Peel Ports and ABP between them operating 9 ports which account for over 40% of tonnage handled by all ports in Scotland.

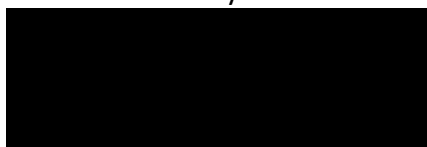
In general we are pleased with the approach taken in the Scottish Marine Plan and we have no significant issues to raise. We note that this is a high level document with relatively little specific detail. However we are pleased to see that the document recognises the important role that ports play and several of the proposed marine policies are to do with safeguarding essential port operations. The Plan is also clearly presented.

We do however share 2 concerns which we understand that ABP will be raising with you ie

- The reference to the IMO's Ballast Water Convention which the UK has not yet signed. We agree with ABP that it would not be appropriate for the Scottish Marine Plan to mandate the Convention's provisions in advance of its signature and ratification;
- The need for the Plan to provide for the mapping and future safeguarding of key shipping routes

We hope these issues will be addressed in the final version of the Plan.

Yours sincerely



RICHARD BIRD
UKMPG Executive Director

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