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From: jfrobins <john@jfrobins.force9.co.uk>
Sent: 29 March 2011 01:32
To: [REDACTED]
Subject: Consultation on seal haul-outs.

E-MAIL FROM: John F. Robins, Campaigns Consultant, Animal Concern, Post Office Box 5178, Dumbarton G82 5YJ. Tel: 01389-841-639, Mobile: 07721-605521. Fax: 0870-7060327. *Animal Concern incorporates the Scottish Anti-Vivisection Society which has been Campaigning for animals since 1876* E-MAIL: animals@jfrobins.force9.co.uk website: <http://www.animalconcern.com/>

Dear Mr. Kent,

I write on behalf of the pressure group Animal Concern and the charities Save Our Seals Fund and the Animal Concern Advice Line.

On the subject of seal haul-out sites the above organisations submit the request that no specific areas be designated as protected places for seals to haul-out but that all hauled-out seals be protected from harassment or persecution.

Seals are at their most vulnerable when on land whether they are hauled-out to moult, breed or simply bask in the sun. When hauled-out, seals are not a risk to fish farmers, salmon netsmen or other fishery interests.

The areas where seals haul-out change. In recent years many haul-out sites have been lost due to encroachment and disturbance from new fish farms. Weather conditions, coastal erosion and other factors can cause changes in haul-out patterns. Seals can also use different haul-out sites at different times of year.

It would be extremely expensive and difficult if not impossible to identify all the major seal-haul out sites, and, even if that was achieved, they could change within months. If the Scottish Government does decide to follow this route the designated seal haul-out sites list would have to be reviewed and amended on at least an annual basis – an extremely expensive and time consuming process.

We ask that this part of the Marine (Scotland) Act be reviewed with a view to making it an offence to harass any hauled-out seal no matter where it is hauled-out and remove the requirement to identify and designate specific seal-haul out locations.

John F. Robins,
Secretary to Animal Concern, Animal Concern Advice Line and the Save Our Seals Fund.

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