

## CONSULTATION QUESTIONS

### General questions

Question 1: Do you consider that the overall number of seal haul out sites proposed at national/regional/local level represent a reasonable balance between seal conservation and other sustainable activities around the Scottish coastline?

The sites proposed are too few and far between

Question 2: Do you consider that additional sites should be included at national/regional/local level and, if so, why, how many additional sites and which sites?

I know many places in my area where seals haul out and none of these are included

Question 3: Do you consider that fewer sites should be included at national/regional/local level and, if so, why, how many fewer sites and which sites?

No, there are too few sites included. It should be considered from a seal's point of view. For young seals I would suspect the proposed sites are too far apart. The terrestrial analogy is the lack of 'corridors' to permit continuity of wildlife populations.

Question 4: Do you agree that existing Special Areas of Conservation for seals should be added to the list of seal haul out sites being considered for possible designation?

Yes.

Question 5: Do you consider that particular national or regional level activities might represent a potential risk of harassment to seals on haul out sites in general?

Yes

Question 6: Do you consider that particular local activities might represent a potential risk of harassment to seals on particular haul out sites included on the list?

Yes, especially disturbance frequency.

Question 7: Do you have any views on whether the boundaries of particular haul out sites included on the list might be revised ?

Cannot comment – do not have time to examine boundaries.

### Equality assessment

The Scottish Government must ensure that any policies that it implements do not unduly discriminate against persons defined by age, gender, disability, sexual orientation, race and religion and belief. We would welcome your views on whether

General comment:

There is a risk that designation of some sites will, by default, imply the remaining sites are "free for all" in terms of human-origin development or disturbance. Therefore, there is an argument for including all known haulout sites.

A second reason why all haulout sites should be recognised is that they form a vital part of a seal's habitat. If only the well separated larger haulout sites are protected and, over time, intermediate sites be compromised (from a seal's point of view) it may lead to a situation where seal habitat is further degraded and populations may become relatively isolated. The analogy is that of fragmented terrestrial habitats where it is now recognised that wildlife corridors are vital to maintaining genetic diversity between populations.

The rocky islets listed below are those known to me as haulouts not only for adults but for also for pupping. It may well be that frequent safe haulout opportunities are necessary when pups are young and taking to the water for the first time so that a network of smaller sites is just as important as the larger sites.

Although the smaller islets have historically tended not to be at risk from human intervention there are many more of them, they are more easily compromised and in the present, with Scottish aquaculture expanding, they could easily be degraded in a slow process of attrition.

The proposal rationale of designating the larger seal haulout sites to encompass 50% of the populations reminds me of the native American Indian tribes being forced into smaller and smaller reservations.

Haulout sites:

Sgeir a' Bhodaich, SE of Cuan Sound, Luing

OS X (Eastings) 175375  
OS Y (Northings) 713155  
Nearest Post Code PA34 4TU  
Lat (WGS84) N56:15:27 (56.257616)  
Long (WGS84) W5:37:41 (-5.628167)  
LR NM753131

An Cleiteadh, SE Cuan Sound, Luing

OS X (Eastings) 175375  
OS Y (Northings) 713155  
Nearest Post Code PA34 4TU  
Lat (WGS84) N56:15:27 (56.257616)  
Long (WGS84) W5:37:41 (-5.628167)  
LR NM753131

Sgeir Criaraidh, E shore, Luing

OS X (Eastings) 175767  
OS Y (Northings) 710792  
Nearest Post Code PA34 4UD  
Lat (WGS84) N56:14:12 (56.236613)  
Long (WGS84) W5:37:11 (-5.619850)  
LR NM757107

Sgeir (no name), Port a' Chreagain, N of Toberonochy, Luing

[NOTE this islet is omitted from more recent OS maps]

OS X (Eastings) 175152  
OS Y (Northings) 709194  
Nearest Post Code PA34 4UF  
Lat (WGS84) N56:13:19 (56.221995)  
Long (WGS84) W5:37:42 (-5.628395)  
LR NM751091

**Sgeir na Cusha, Cullipool, Luing**

OS X (Eastings) 172881  
OS Y (Northings) 710674  
Nearest Post Code PA34 4TY  
Lat (WGS84) N56:14:03 (56.234186)  
Long (WGS84) W5:39:58 (-5.666210)

**Sgeirean a' Mhaoil, E Scarba**

[NOTE there are 2 rocky islets here, sometimes shown as 1 islet on OS maps. I counted 55 seals here once]

OS X (Eastings) 171952  
OS Y (Northings) 705046  
Nearest Post Code PA34 4TZ  
Lat (WGS84) N56:10:60 (56.183281)  
Long (WGS84) W5:40:35 (-5.676327)  
LR NM719050

## Racu O (Oana)

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**From:** Peter Lamont [REDACTED]  
**Sent:** 20 June 2011 11:55  
**To:** Seal Haul-Out Consultation mailbox  
**Subject:** individual response - Seal haul-out consultation

Dear Sirs,

I have posted a response today by first class mail (20th June) but am concerned it may not be delivered in time and therefore repeat my submission here.

Thank you for your attention.

Peter Lamont  
BSc.(Hons.) Zoology

Individual response  
Lamont, Peter

Email: [REDACTED]

I agree to my response being made publicly available.

Name public but not address.

I am happy to be contacted by policy team if required.

Q1. no.

Q2. yes, the presumption should be for all sites to be included unless no detriment (to seals) for excluding a particular site can be proven.

Q3. no

Q4. yes

Q5. yes

Q6. no knowledge re. any particular designated site

Q7. no knowledge re. any particular designated site

Equality assessment. no knowledge of any impact

General comment:

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Peter Lamont

[REDACTED]

or

[REDACTED]

<http://www.sams.ac.uk>

Scottish Association for Marine Science (SAMS)

Scottish Marine Institute

Oban, Argyll,

PA37 1QA

Scotland

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