

Q1 Do you support the development of an MPA network in Scotland's seas?

I support the development of an MPA network in Scotland's seas and the science-based process of MPA designation.

However, I am saddened by the lack of provision in the proposals for Scotland's nationally and internationally important seabird populations. I understand that, with the exception of *black guillemot*, seabirds were excluded from the selection process, based on the idea that they receive sufficient protection from Special Protection Areas (SPAs) under the EC Birds Directive. This legislation has been in place for over 30 years and yet, over that time and particularly over the last ten years, we have seen serious and rapid declines in the population of many species protected under the EC Birds Directive. In some areas of Orkney *kittiwake* populations have decreased by over 90%.

Having excluded all except one seabird species from the MPA process, will the Scottish Government now commit to putting in place effective, properly managed protection for our seabirds, and particularly for their feeding areas, under the EC Birds Directive?

I am also very concerned that there appears to be little detail, in either the management handbook or the individual site proposals, about monitoring the performance of the MPAs. A detailed programme of monitoring, both within and outwith the MPAs, is required. Without it, appropriate management is impossible and the Scottish Government will fail in its duty to protect and recover the health of Scotland's seas.

Q2 Clyde Sea Sill; Q3 East Caithness Cliffs; Q6 Fetlar - Haroldswick; Q13 Monarch Isles; Q19 Papa Westray; Q21 Small Isles; sites proposed for the protection of *black guillemot*.

I support the MPAs proposed for *black guillemot*, a wonderful, charismatic seabird. Watching tysties in the harbour while waiting for a ferry is a highlight of many trips to the islands. I encourage the Scottish Government to make sure that the management measures for the kelp forests, which form the *black guillemot's* main feeding grounds, are fit for purpose. Those proposed appear minimal, with no attempt made to anticipate future risks. A detailed survey of *black guillemot* populations is required as a matter of urgency, as the most recent detailed survey is 15 years old.

Q28 & Q29 Firth of Forth proposed MPA

It is important that the Firth of Forth Banks complex MPA is included in the network. The Scottish Government's scientific advice from JNCC and SNH makes it clear that the suggested alternatives do not constitute an ecologically equivalent contribution to the network. Selecting the alternatives would seriously undermine the completeness of the network and the science-based process of selection and designation.

The Firth of Forth Banks is also one of the most important sites on our coast for *sandeels*, an essential food source for Scotland's seabirds. This site must be designated and *sandeels* added to the list of features protected throughout the site.

Q35 Is the proposed network complete?

Without effective protection for seabirds at sea the network cannot be considered complete.