

CONSULTATION ON MPA NETWORK IN SCOTLAND'S SEAS

CONSULTATION QUESTIONS:

1. Do you support the development of an MPA network in Scotland's Seas?

I fully support the designation of the 33 proposals as a first step in a coherent network of sites in Scotland. However, I am unclear about the connectivity of the sites if the marine environment is to return to a species-rich ecosystem throughout Scotland. As an adjunct I would also propose that some sites, known to have had their rich biodiversity destroyed particularly by destructive fishing practices, be added as research controls to explore over 10 years the ecological changes that occur to bring the sites back into productivity.

I attended many of the workshops in Edinburgh designed to establish the relative merits regarding the proposed sites, and the science behind each proposal was discussed. The work done by SNH, JNCC and MS is impressive and the literature is extensive and well prepared. The holistic approach to marine ecosystems, habitats and geodiversity is mostly good. So based on the science presented I agree with all 33 recommendations.

However, in my view the recommendations do not go far enough. Although we have SACs, SPAs, SSSIs and Ramsar sites around the Scottish coast, the true connectivity for species distribution and restoration appears incomplete, so I hope that further MPAs will be designated promptly. It is clear from Scotland's Marine Atlas that many other species are in decline and need protection, from seabirds to sharks, fish stocks to basking sharks, seals to sandeels. The seabed has been harmed in many areas by destructive trawling, dredging and overfishing so also needs protection to recover. So whilst the science does not now support an MPA, it may be simply because of destructive activities over time. It can be done, as has been shown in Lamlash Bay No Take Zone, which after 5 years shows very encouraging indications of recovery. So to encourage connectivity in Scottish waters, larger areas for recovery also need to be designated. Examples might be former well-known fishery nursery beds.

The four areas to be further considered are Skye to Mull, Southern Trench, Eye Peninsula to Butt of Lewis and Shiant East Bank. These search locations need to be progressed quickly. It sometimes appears that since Coll, Colonsay, Lewis and the Shiant are further off shore and the small populations less vociferous in the media, further from the centres of power and therefore less in touch with the Scottish Government, so there is a danger that less effort is given to those features and species in those areas. Certainly these areas may be at risk from overfishing or over creeling if other areas are confirmed for protection. Further, the big push by the Scottish Government for larger salmon fin fish farms to meet output expectations may damage some of these areas beyond immediate repair. The latest consultation on seaweed aquaculture is another threat to sensitive areas, yet nothing on either of these possibly conflicting developments is mentioned in this consultation. That is disingenuous since both will affect ecosystems and indeed tourism in the affected areas on the west coast. There needs to be much more use of

independently sourced environmental impact assessment of large scale development proposals to ensure spatially protected areas are not damaged by unrestrained growth in these sectors

For example in the area from Skye to Mull there are populations of iconic basking sharks, superb underwater reefs awaiting more research. Underwater pictures taken by Lothian sub-aqua club members during their recreational diving off the northeastern coast of Coll for example show wonderful marine geological features and marine species. Clearly the biodiversity and ecosystems create ideal conditions for basking sharks, dolphins, soft corals, seal haul out areas and seabirds including black guillemots. The planktonic life is clearly of vital importance to the basking sharks, and this planktonic bloom in time also supports the fish eaters. So in support of the network overall, it is hoped Marine Scotland, SNH and JNCC are continuing the work to further evaluate the importance of these pMPAs as soon as possible.

It appears to me that a coherent network is extremely important if sustainability is to be maintained. It is well known that overspill from MPAs greatly assists in the improvement of stocks of marine species. Baseline and continuing studies over several years are essential to monitor progress in MPAs. The appearance of one species once is hardly a measure of progress, just as seeing a black guillemot is not an indication of a breeding population!

In addition there needs to be a more in-depth study of the socio-economic case for designation, especially on the west coast. For example in many of the pMPA areas, tourism provides the key to their main income, linked to diving, recreational angling, yachting, B&Bs, food outlets etc as well as observing basking sharks, dolphins, haul out sites for seals, birds and other features associated with SPAs, SACs, SSSIs. Creeling is also important and is often linked to local food supply. What could be disastrous for the west coast communities would be displacement of destructive commercial bottom trawling and dredging activity from pMPAs that would then disproportionately damage other marine environments, both features and species. Another possibility is that restrictions in use of mobile gear leads to a massive increase in creeling, so jeopardising the sustainability of protected areas. Effort control will be required. The appropriate management by relevant authorities and communities of pMPAs and surrounding areas is critical for the success over all of Scotland's seas in the longer term. Dialogue and collaboration will be keys to success.

I am hopeful that after such an effort by all concerned to arrive at this point the political will at Holyrood will enable all the sites to be confirmed including those still under consideration and indeed the Demonstration and Research site of Fair Isle. There is some scepticism about the consultation following the problems seen in England and Wales. Is it really being agreed on the science or will political expediency and the power of the lobby play a greater part? Where will that leave the smaller communities and offshore pMPAs?

My knowledge of many of the areas is insufficient to comment on various aspects so I am limiting my comments to the Clyde area.

Individual possible Nature Conservation MPAs

1. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Clyde Sea Sill* possible Nature Conservation MPA?

Designation: YES

The physical features of the Clyde Sill associated with mixing waters, plankton blooms, salinity features and upwellings make this an excellent candidate. Associated with a range of ecosystems and close to an SSSI for breeding seabirds including black guillemots (at almost their southern range). It is also the margin that separates the Clyde Sea from the North Channel. This is a unique combination of features on the west coast of Scotland.

Management of the designation could be problematic since mobile fishermen are active in this area. What could be a problem is the change from mobile to creeling activity and therefore unsustainable number of creels in inshore waters. The balance of trawling will need to be considered.

11. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sween* possible Nature Conservation MPA?

Designation: YES

The sheer diversity of features and biodiversity makes this a unique sea loch, plus the tide swept Sound of Jura. Considerable research data has been collected here over the years the interpretation of which provides sound reasons for its inclusion.

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22. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *South Arran* possible Nature Conservation MPA?

Designation: YES

The recent No Take Zone in Lamlash Bay is showing signs of recovery after 5 years, so it is reasonable to assume the various species features in the South Arran MPA will increase in occurrence with MPA protection. This is an area of the Clyde, which was once rich in white fish and with fishery nursery grounds. Many of the priority features meriting MPA designation are present.

Management may be problematic as this area of the Clyde is regularly bottomed trawled for prawns and dredged for scallops, so a good working relationship will need to be developed between the Clyde IFG, the Scottish Creel Fishermen's Federation, the Arran community and Marine Scotland Compliance with understanding on all sides. Gear conflicts have recently been a feature around Arran.

25. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Upper Loch Fyne and Loch Goil* possible Nature Conservation MPA?

Designation: YES

There was lengthy discussion at the workshops over this designation, especially by mobile fishermen's representative who wished Loch Long to be substituted for Loch Goil. Hopefully this designation of Loch Goil and Upper Loch Fyne will be retained, even under pressure, as the two areas are understood to be rich in features and ecosystems.

Management of mobile fishing activity will be a feature for all the Clyde MPAs. Over the past few years there have been serious gear conflicts and many creels have been lost in the Clyde area. Better management options and good communication will need to be instigated.

Sustainability Appraisal

34. Do you have any comments on the Sustainability Appraisal of the MPA network as a whole?

This word has many meanings and too often it appears to mean “as good as possible given the circumstances and narrow definition”. Fish farming on the scale of salmon farming on the west coast is no more sustainable than the worse type of chicken farming. Yet it continues to get approval. Both SEPA and SNH as statutory consultees see no problems with large amounts of faeces and food waste entering the pristine waters of western Scotland. Food pellets sourced in major part from the south Atlantic are unsustainable. This combined with the dilute and disperse environmental practice which was essentially proscribed on land between 1975-1980 as the only way to achieve river water quality and ecology management; the use of toxic chemicals, ever stronger, especially for lice containment potentially damaging other crustacean life cycles adds up to gross negligence. The resultant severe local damage to the seabed with faeces, lack of oxygen, and concentration of chemicals appears acceptable to Marine Scotland in order to meet the strategic aim of increasing salmon production by 50% by 2020. Now the move to more open water will disperse the chemical and faeces even further. The carbon footprint of the salmon, sold to China, is hardly sustainable either. I wonder why the criteria for MPAs are so strict in stark contrast to approval for these large salmon farms. The newest thrust driven no doubt by strong commercial interests appears to be seaweed farming and it is suggested to be on the threshold of taking off, with an estimate that seaweed farms covering 15,000 sq km of UK water could be in operation by 2050. Is this combination Good Environment Status?

I in company with others have concern that the appraisal has not taken into account the real value of benefits, which will arise from the MPA network. Many small businesses and employment opportunities depend on tourism in its widest sense- from recreational angling, diving, yachting, B&Bs, food outlets, inshore tourist boating, even ferry services. Examples in other countries, the most notably New Zealand, have shown huge financial benefits to tourism over time related to marine conservation. Insufficient work has been done on this, since these groups often do not work through major stakeholder paid lobbyists, as is the case with the Scottish Fishermen’s Federation or multinational aquaculture companies. However, one study on marine recreation shows recreational diving and angling is worth between £67M and £117M per year in 20 of the proposed MPAs.

Marine ecosystem services are vitally important to us all. Protecting those must be an important part of any marine strategy in marine planning going forwards.

Final Thoughts

35. On the basis of your preferences on which pMPAs should be designated, do you view this to form as complete or ecologically coherent network, subject to the completion and recommendations of SNH's further work on the 4 remaining locations?

Looking at the marine map of Scotland it is clear there are large gaps in the pMPA network. The list of species considered is inadequate and whilst some seabirds are designated under SPAs, seabird MPAs must be considered in addition to black guillemots around the inshore waters. Spatial protection of many species continues to be an issue, so research at the four sites still under consideration, including Skye to Mull, needs to be completed quickly. Further the Demonstration and Research MPAs, especially Fair Isle, must also be progressed quickly. Fair Isle with its integrated social, economic, community and marine environments is a role model of an integrated ecosystem of the holistic sort. There will only be an ecologically coherent network when protection around Scotland's coast provides for all species and habitats with spatial protection. Future research outcomes and monitoring will continue to reinforce the fact that clearly there are ecological linkages between all parts of the marine system.

36. Do you have any comments on the case for designation, management options, environmental and socioeconomic assessments of pMPAs, or the network as a whole?

Under European Legislation, Scotland has a legal obligation to enhance Scotland's seas. Good Environment Status by 2020 and the Marine Strategy Framework Directive are essential parts of that enhancement. The designated MPAs will create the conditions for species and habitat recovery. Critically, management of the sites must be effective. The pressure for continued trawling and dredging will pose problems for management. For example, how does Marine Scotland intend to keep some of the Northern Irish boats out of protected waters up the NW coast and in the greater Clyde area? How will IFGs, which must reflect all fishing sectors, be involved in the management of inshore waters? Clearly there will need to be flexibility in approach and even within MPA areas. However MPAs without management teeth are purely paper reserves. That will not be good for recovery of ecosystems.

I am an individual and willing for this response and my name to be published on the Scottish Government website, but not my address.
If the Scottish Government wishes to contact me again in relation to this consultation exercise, I am willing to be contacted.

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