

SUBJECT :

22/10/13

PLANNING SCOTLAND'S SEAS

MPA CONSULTATION

19/10/2013

Dear Sir / Madam

Please find enclosed my individual response to the Marine Protected Areas Network Proposal Consultation.

I have filled in and returned with the letter only those parts of the form where I have made comments or where necessary details are requested.

I do hope the comments are useful, but please do let me know if any clarification is needed.

Many thanks for having the opportunity to comment on the MPA proposals

Yours sincerely

MPA 10044

- (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes ✓

CONSULTATION QUESTIONS

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

Yes ✓

Comments

It is vital that MPA's be established to help protect Scotland's marine resources and ecosystems. This initiative is therefore to be warmly welcomed. Hopefully more MPA's will be created or designated as time goes on. However, the proposals need to go further at this formative stage. It is essential that seabirds are included among the species and groups receiving recognition and protection. Many species of seabird have been experiencing drastic decline in recent years, and some could even undergo area and regional extinction at the present rate, unless swift and decisive action is taken, the suspicion being that the problems being experienced at many colonies are in part at least due to human activities such as overfishing.

Individual possible Nature Conservation MPAs

2. 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 ✓

Comments As one who has all his sixty-nine years in the Firth of Clyde area, I have witnessed a dramatic decline in fish stocks over that period, and so MPA designation in my opinion is vital. The decline is well illustrated by the comprehensive falling-away in the numbers of sea anglers frequenting the area, this being especially the case since the 1970's. The presence of these people, who were often seeking to catch bottom-living species like cod and haddock, must have provided a substantial boost to local economies. For example, quite a few boat-hirers were still in business until around the 1970's. Apart from the presence of mackerel in the summer months, the suspicion is that lack of other fish has driven most anglers away.

Protection of sea areas would hopefully allow fish stocks and natural ecosystems to recover. As well as benefiting the natural environment, the hope is that this would in the longer term allow more sustainable commercial, as well as sport fishing, to experience a revival.

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

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

Comments The comments I made under "Clyde Sea Sill" would also apply to all the Clyde sea lochs, including Loch Fyne and Loch Goil.

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

26. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *West Shetland Shelf (formerly Windsock)* possible Nature Conservation MPA?

Designation:

Yes No

Choices to represent features in the MPA Network

28. **Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea, do you have a preference or comments on the following combinations to represent these features, bearing in mind Turbot Bank will need to be designated to represent sandeel in this region:**

Firth of Forth Banks Complex

Turbot bank and Norwegian Boundary Sedimentary Plain

Or Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain

Comments I would say that it is absolutely vital that sandeels are protected. A number of seabird species, including various auks, depend heavily on sandeels, especially during the breeding season, and there is a strong suspicion that one of the main reasons for the serious decline that has been taking place in many of our seabird colonies in recent years is linked to a decline in sandeel stocks. I would extend my comments here to apply to other areas where sandeels also form an important part of the marine ecosystem.

29. **Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea?**

Yes No

Comments

30. **Recognising the scientific advice from JNCC included alternatives for representing the burrowed mud feature in the Fladens, do you have a preference or comments on the following combinations to represent these features, bearing in mind the part of Central Fladen (known as Central Fladen (Core)) containing tall seapen (*Funiculina quadrangularis*) will need to be designated to represent tall seapen in this region:**

Central Fladen pMPA only

The tall sea-pen component of Central Fladen, plus Western Fladen

Or the tall sea-pen component of Central Fladen, plus South-East Fladen.

Sustainability Appraisal

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

Yes No

Comments

Final Thoughts

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

No

Comments While half-a-loaf is better than no loaf at all, and while I acknowledge that the proposed network of MPA's does represent a potentially great opportunity, I would like to think that other areas might be promoted as MPA's in the not too distant future. For example, I should have thought that Loch Etive, with its uniquely brackish waters, might be worthy of consideration. I remember once catching a perch there off Glen Noe- I don't think you'll find that circumstance in many of our sea lochs! Loch Etive may also be relevant in that I believe it may be under threat from over-development on the part of fish-farms, while the tidal regime could ultimately be at risk from alteration should any major tidal power schemes ever be implemented at Falls of Lora.

I'm not sure if Loch Long is included in the Clyde^{SEA SILL} designation. It's extremely popular with sport divers, especially in the upper reaches, which might suggest a richness in ecological/ natural features is one of the attractions, though I confess to having no in-depth knowledge. I have certainly noticed a richness of flora and fauna appearing on the tideline south of Coulport, on the Rosneath Peninsula, after winter storms, including the bivalve *Arctica Islandica*.

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

Yes

Comments Please see my comments under the above box. I would add that in my opinion, the setting up of MPA's cannot come quickly enough. In order that the system should succeed, it goes without stating that monitoring and control must be robust. I would also suggest that some patience will be a virtue- I don't think you can expect to see overnight results, which some might expect in to-day's frenetic world. For example, to the best of my knowledge, the once-famous Grand Banks fishery off Newfoundland has still not recovered after the collapse of commercial fishing there some years ago.

Many thanks for having the opportunity to make a few comments.