

Sea-Changers response to the Scottish Governments MPA Consultation 2013

To Whom it May Concern

Sea-Changers is a registered charity (Reg Charity No (Scotland) SCO43922) which has a vision of creating a world where the seas and shores are clean and healthy, marine species are protected and where, far from damaging the oceans, those who use the sea for leisure pursuits contribute positively to the sustainability of the marine environment. We are, therefore, interested in the progress of the Marine Protected Areas designation process.

The Marine (Scotland) Act 2010 provides a great opportunity to improve the state of our seas and adapt to current international conventions regarding integrated marine management. (Q1) Sea-Changers fully support the designation of all of the 33 sites proposed by Scottish Natural Heritage and JNCC in 2013 and enforcement of appropriate management as soon as possible.

We hope that the sites will represent a network that will actively recover the habitats and species that make our seas so special rather than just safeguard a few isolated examples. Current estimates indicate there are around 6,500 animal and plant species in Scottish waters; however the MPA network considers only 43 species and habitats for protection and currently overlooks the need for vital protection for seabird feeding areas. MPA sites for whales and dolphins remain uncertain. We are concerned to note that these further 4 search areas remain and we would encourage the Scottish Government to research and designate these sites as soon as possible.

It is important these sites work together to maximise the benefits to our seas, so the design of the network needs, in our opinion, to:

- Replicate features in separate protected areas to safeguard against unexpected failures,
- Represent the full range of marine habitats and wildlife found in Scotland's seas,
- Allow connections between sites so they can link and support each other by taking advantage of ocean currents, migration routes and other natural ecological connections,
- Create sites which are a suitable size and shape to encompass ecological processes and the home ranges of protected features.

The estimated economic benefit of a network of Marine Protected Areas in Scottish waters over 20 years is £6.3 billion - £10 billion (Scotlink). With this in mind we welcome the increase in protection from 11% to 23% of Scotland's seas and would encourage the Scottish Government to see this as a starting point for sustainable management rather than the end of the road.

(Q35) We would consider the network ecologically coherent when all species and habitats that can benefit from protection are adequately represented and when robust science shows the network supports and enhances the ecological links between the different MPAs.

We applaud the Scottish Government's approach that designation does not mean a no-go or no-take zone but would encourage the firm adoption of a precautionary approach where activities allowed within the designated areas are closely monitored and reduced or removed if they are proven to have a negative effect. We realise that this is a resource intensive process and would highlight the

need for sustained monitoring effort and proactive management especially in the first round of designations. To allow fish stocks to fully recover, MPAs must be used in tandem with other measures such as marine planning and sustainable fisheries management.

(Q34) Seachangers is concerned that the Sustainability Appraisal does not fully account for the socio-economic benefits that could arise from the proposed MPA network. For example, a recent study revealed that recreational diving and angling in 20 of the proposed MPAs in Scotland is valued at between £67 million and £117 million per year. In addition, divers and anglers questioned said they would make a one-off payment collectively worth between £142-£255 million to see these sites protected and damaging activities stopped (Scotlink). Similar studies are needed to demonstrate the benefits of the Scottish MPAs to other user groups.

(Q36) It is made clear within the consultation document that management decisions will be made after designation. Whilst we understand this, it's important that these decisions will be made in close consultation with local communities. Sea- Changers works with and aims to engage those who use the sea for their leisure pursuits (divers, sailors, surfers etc.) in marine conservation fundraising and actions. We believe that MPA management represents an exciting opportunity to engage these and other members of the community in marine conservation issues. Such engagement will be central to the real and perceived success of MPA's.

We wish to see a confirmed and binding plan and timetable for future designation tranches, a plan that will sufficiently meet our international conservation commitments.

Yours sincerely,

Helen and Rachel

Co-Founders

Sea-Changers

Address: PO Box 9990 Leicester LE3 4FB~

Tel: 07909 897867

Email: Helen@sea-changers.org.uk