

Q1. Does the NMP appropriately guide management of Scotland's marine resources?

Comments

Q2. Does the NMP appropriately set out the requirement for integration between marine planning and land use planning systems?

Comments

Q3. Does the NMP appropriately guide development of regional marine planning? What, if any, further guidance is required for regional marine planners in terms of implementation and how to interpret the NMP?

Comments

Q4. The Marine Regional Boundaries Consultation proposed that in addition to regional marine planning, further integrated management of key marine areas would be achieved by designating the Pentland Firth; the Minches and the mouth of the Clyde as Strategic Sea Areas.

Should the NMP set out specific marine planning policies for Strategic Sea Areas?

Comments

Q5. Are the objectives and policies in the NMP appropriate to ensure they further the achievement of sustainable development, including protection and, where appropriate, enhancement of the health of the sea?

Comments

Q6. Chapter 3 sets out strategic objectives for the National Marine Plan and Chapters 6 – 16 sets out sector specific marine objectives.

Is this the best approach to setting economic, social and marine ecosystem objectives and objectives relating to the mitigation of and, adaptation to climate change?

Comments

Q7. Do you have any other comments on Chapters 1 – 3?

Comments

General Planning Policies

Q8. Are the general policies in Chapter 4 appropriate to ensure an approach of sustainable development and use of the marine area? Are there alternative policies that you think should be included? Are the policies on integration with other planning systems appropriate? A draft circular on the integration with terrestrial planning has also been published - would further guidance be useful?

Comments

Q9. Is the marine planning policy for landscape and seascape an appropriate approach?

Comments

Q10. Are there alternative general policies that you think should be included in Chapter 4?

Comments

Guide to Sector Chapters

Q11. Do you have any comments on Chapter 5?

Are there other sectors which you think should be covered by the National Marine Plan?

Comments

Sea Fisheries

Q12. Do you have any comments on Sea Fisheries, Chapter 6?

Comments

Q13. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Aquaculture

Q14. Does Chapter 7 appropriately set out the relationship between terrestrial and marine planning for Aquaculture? Are there any planning changes which might be included to optimise the future sustainable development of aquaculture?

Comments

Q15. Do you have any comments on Aquaculture, Chapter 7?

Comments

Q16. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Wild Salmon and Migratory Fish

Q17. Do you have any comments on Wild Salmon and Migratory Fish, Chapter 8?

Comments

Q18. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Oil & Gas

Q19. Do you have any comments on Oil and Gas, Chapter 9?

Comments

Q20. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Carbon Capture & Storage (CCS)

Q21. Do you have any comments on Carbon Capture and Storage, Chapter 10?

Comments

Q22. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Offshore Renewable Energy

Q23. Should the NMP incorporate spatial information for Sectoral Marine Plans?

Comments

Q24. Do you have any comments on Offshore Renewable Energy, Chapter 11?

Comments

Q25. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Recreation and Tourism

Q26. Do you have any comments on Recreation and Tourism, Chapter 12?

Comments

Q27. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Transport (Shipping, Ports, Harbours & Ferries)

Q28. Should the NMP specifically designate national significant ports/harbours as described in Chapter 13: Marine Planning Policy Transport 2?

Comments

Q29. Do you have any comments on Transport, Chapter 13?

Comments

Q30. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Telecommunication Cables

Q31. Do you have any comments on telecommunications, Chapter 14?

Comments

Q32. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Defence

Q33. Do you have any comments on Defence, Chapter 15?

Comments

Q34. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Aggregates

Q35. Do you have any comments on Aggregates, Chapter 16?

Comments

Q36. Are there alternative planning policies that you think should be included in this Chapter?

Comments

Business and Regulatory

Q37. Please tell us about any potential economic or regulatory impacts, either positive or negative, that you think any or all of the proposals in this consultation may have.

Comments

Equality

Q38. Do you believe that the creation of a Scottish National Marine Plan discriminates disproportionately between persons defined by age, disability, sexual orientation, gender, race and religion and belief?

Yes No

Q39. If you answered yes to question 23 in what way do you believe that the creation of a Scottish National Marine Plan is discriminatory?

Comments

Sustainability Appraisal

Q40. Do have any views/comments on the Sustainability Appraisal carried out for the NMP?

Comments

West of Scotland Fish Producers Organisation,

Response to

Planning Scotland's Seas

This response to the consultation by Marine Scotland will not be as detailed as responses by larger organisations, as we do not have the manpower to dedicate the time needed for such a response, to what is a substantive document. However, as all three consultations will have a huge impact on fishing down the line, we feel it is important that we comment on them. For the Marine National Plan and the Sectoral Plans for offshore wind, wave and tidal energy in Scottish waters, we will only comment on the general principles as we see them affect the fishing industry, however we will look at the Possible MPA areas in a little more detail.

Marine National Plan

Fishing in Scotland is already heavily regulated, European policy in the form of the Common Fisheries Policy and other national policies, already makes the fishing industry one of the most heavily regulated industries in the country. Upon this, further control will be required as a consequence of the implementation of the MPA network and other directives being handed down from the EU. There can be no advantage to the fishing industry to add further layers of bureaucracy as a result of the introduction of the Marine Plan. It is our view that powers to control and manage fisheries should remain central and under the control of Marine Scotland, and not be delegated to regional planners.

The Scottish Government continually talks up the importance of the fishing industry, both to the communities supported by it and to the wider economy through the quality and value of the product it provides on a worldwide basis, however when this is measured against other Scottish Government priorities, the fishing industry tends to drop down the list. It is our opinion that Fishing and by extension fishing grounds should be accorded the same rights in the marine planning process as agriculture is in the terrestrial planning process. It is worrying that the document predisposes a presumption in favour of sustainable development, presumably against existing activity. This in our opinion leaves fishing with very little protection against any future developments as long as they are bracketed as sustainable. The inclusion of fisheries legislation, both current and forthcoming as part of the plan seems odd, should the EU choose to revise its legislation, will this lead to revisions of the plan.

Sectoral Marine Plans for Offshore Wind, Wave and Tidal Energy in Scottish Waters

Like many other fishing organisations, WSFPO has been nervous about the installation of offshore renewable energy sources ever since they were first suggested. It is inevitable that such installations will affect fishing activities. It is clear from this plan as well as the Marine Plan that renewable energy installations development will take precedence over existing fishing activity. From our perspective this is deeply disappointing, again we have the Scottish Government purporting to support our industry, only, as long as it does not interfere with other policy objectives.

Proposed MPAs

While maybe not the intention of the Scottish Government, WSFPO feels that some groups have used this process to further their own aims and environmental beliefs that where possible, fishing, and in particular bottom contact gears should be banned. It is against that background that WSFPO will make its response. While we do not oppose the MPA project, and indeed have where possible engaged with the process in the hope that solutions can be found to allow fishing to move forward with as little impact as possible, but at the same time allowing the Scottish Government to meet the various international commitments that this process is attached to.

It is acknowledged that MPAs themselves do not affect fishing; however, the introduction of potential management measures has the ability to do irrevocable damage, through reduction in fishing grounds, to what has become an industry continually on the brink.

The MPA project is guided by the principles of the OSPAR convention, and using this principle, we believe that the MPA network will be considered on a UK basis. Therefore, we question whether the amount MPAs proposed in Scotland is necessary and whether this will lead to the unnecessary duplication of features. There are further questions on whether the scale of the Scottish Seas within the wider context of the legislation will be big enough to determine whether they are considered to be conserving or recovering features. In this context we feel that the Scottish Government is being presumptuous in its approach to the MPA network, as only when the coherent network that has filled the necessary gaps as determined by the OSPAR convention is available will it be possible to determine MPAs. It is a pity that there is no description mentioned in the report of what and where these gaps are in the OSPAR Network. From this, we believe that only when the UK has determined what sites will form part of the OSPAR regional network, can ministers then propose which Scottish MPAs will form part of this network. WSFPO understands that within the OSPAR network replication of sites is required, however we would suggest that replication is more than one, i.e. two. However, we find that within Scottish waters of OSPAR Regions, Burrowed Mud has seven sites proposed.

The report states the Nature conservation MPAs and their selection will be based in scientific evidence. We are concerned about the quality and review of this evidence contained within the Report. At the meeting to discuss the Small Isles MPA, there were questions asked about the science underpinning the selection of the Horse and Fan mussels with this proposed MPA. The answer was scant; stating that they had only been discovered within the last six years, however to no attempt has been made to find out what the scientific history is of these features within the MPA area.

We also find it unacceptable that in a project as important as this the Scottish Government are willing to accept SNH as judge and jury of the evidence; we feel that a proper peer review of all the evidence should have taken place.

There are other issues within individual areas that we have concerns with, for example in the South Arran, pMPA, one of the reasons for protection proposed is herring spawning grounds. We were under the impression that the purpose of this project is to protect marine features and bio diversity; surely, if the spawning herring require protection, this should be done through fisheries management channels. There are other species mentioned in each of the search areas, that on closer inspection are included in other directives or are not eligible to be included as part of the MPA network.

It is clear from the evidence produced that the fishing industry is likely to be the hardest hit by the MPA proposals, adding this to the pressure on fishing grounds from both the renewable energy

sector and aquaculture, there is the potential for a dramatic loss in available fishing ground. There is mention of displacement within the reports but no attempt at this stage has been made to quantify this. The issues surrounding displacement are complex with several factors needing to be taken into account. While, for some displacement means that all fishermen have to do is lift their nets and move to another area, the reality is different. There is a reason why vessels fish where they do, that is where the most productive grounds are and displacement is likely to have cost implications for the fleet. Issues to be considered when moving to other areas are higher fuel costs, gear conflict, fishing ground may already be in use for another purpose, quota issues; vessels may not have quota available for what can be caught in the area they are displaced to, all of which have to be taken into consideration. As well as this pressure on fish stocks within these areas is likely to increase, with no guarantees that as some suggest reduced fishing pressure in MPAs will lead to increased stock abundances in these areas resulting in overspill out of the MPA.

In the management options for many of the areas, the option is to reduce or limit fishing pressure, we would have liked more detail for each area as to what exactly this would entail and who will make the decision as to what level of fishing pressure is sufficient to protect the feature?

In the Small Isles MPA search area, it is suggested that protection should be accorded on the fan and horse mussel aggregations, while not disputing this issue, SNH have yet, despite being asked to provide evidence of exactly where the aggregations occur. At the workshop, they attended for this area; the scale of the map used was insufficient for those attending to determine whether any protection would interfere with fishing operations. Fishermen requested exact co-ordinates, so they could assist SNH in determining the area to be protected, however no information has to date been forthcoming.

As suggested at the outset, we believe that this project has been used by some to further their own environmental aims to the prejudice of the fishing industry. We accept that Scottish Government has international commitments to adhere to; however, these commitments must be met by keeping to the terms of any such agreements and not be used as an excuse to create an environmental utopia around our coastline at the expense of legitimate business.

Therefore at this stage and until the concerns noted above are addressed, WSFPO are opposed to the sites being proposed being put forward as MPAs.

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