



# Association of Salmon Fishery Boards

## Comments on the Consultation on Possible Nature Conservation Marine Protected Areas November 2013

### Introduction

The Association of Salmon Fishery Boards is the representative body for Scotland's 41 District Salmon Fishery Boards (DSFBs) including the River Tweed Commission (RTC), which have a statutory responsibility to protect and improve salmon and sea trout fisheries. The Association and Boards work to create the environment in which sustainable fisheries for salmon and sea trout can be enjoyed. Conservation of fish stocks, and the habitats on which they depend, is essential and many DSFB's operate riparian habitat enhancement schemes and have voluntarily adopted 'catch and release' practices, which in some cases are made mandatory by the introduction of Salmon Conservation Regulations. ASFB creates policies that seek where possible to protect wider biodiversity and our environment as well as enhancing the economic benefits for our rural economy that result from angling. An analysis completed in 2004 demonstrated that freshwater angling in Scotland results in the Scottish economy producing over £100 million worth of annual output, which supports around 2,800 jobs and generates nearly £50million in wages and self-employment into Scottish households, most of which are in rural areas.

### General comments

We welcome the opportunity to comment on this consultation. ASFB believe that an ecologically coherent network of Marine Protected Areas with an aim of protecting and enhancing Scotland's marine environment is extremely important. Whilst we recognise that none of the proposed MPAs will be specifically designated for Atlantic salmon or sea trout, we believe that there will be additional benefits to these species during the marine phase of their life cycle. We also believe that following designation, and where appropriate, consideration should be given to introducing management measures for these species (which are in themselves are Priority Marine Features) as well as some of the other PMFs for which specific area based protection is not envisaged.

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

Yes  No

ASFB support the development of such a network as we believe that both Atlantic salmon and sea trout (which are Priority Marine Features) would benefit from such areas (if appropriately managed). Several of the proposed MPAs are in areas we would expect to be important migration routes for Atlantic salmon or the species to be protected are likely to provide important habitat for sea trout during their marine phases.

### 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  No

As this MPA straddles the migration route for all Atlantic salmon originating from the rivers in the Firth of Clyde and any sea trout leaving the firth, we believe that there are likely to be additional benefits to these species. This is likely to be the case if the PMFs in question are managed appropriately. We support the designation of the Clyde Sea Sill possible NC MPA

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: reduce or avoid pressure from new or expanded renewable developments; Reduce or limit pressures associated with use of demersal mobile/ active gear; exclusion of pressures associated with static gear (set nets e.g. fyke, gill, trammel or tangle); and removal of mink.

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**3. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East Caithness Cliffs* possible Nature Conservation MPA?**

Designation: Yes  No

This MPA covers an area which is likely to be a key migration route for Atlantic salmon and may be used as a marine feeding area for sea trout. We believe that there are likely to be additional benefits to these species. This is likely to be the case if the PMFs in question are managed appropriately. We support the designation of the East Caithness Cliffs possible NC MPA.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options for: exclusion of pressures associated with static gear (set nets e.g. fyke, gill, trammel or tangle); and removal of mink.

Socioeconomic Assessment: Yes  No

Comments

All of the above:

Yes  No

Comments

**4. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East of Gannet and Montrose Fields* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**5. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Faroe-Shetland sponge belt* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**6. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Fetlar to Haroldswick* possible Nature Conservation MPA?**

Designation:

Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options:

Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options for: Reduction or limitation of pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing finfish farms in areas where they would be likely to impact on maerl beds and horse mussel beds; the exclusion of towed/active gear from areas of maerl beds and horse mussel beds; measures to reduce or limit the intensity of towed/active gears from areas of kelp and seaweed communities on sublittoral sediment, shallow tide-swept coarse sands and circalittoral sand and coarse sediment communities; exclusion of pressures associated with static gear (set nets e.g. fyke, gill, trammel or tangle); and removal of mink.

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**7. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Hatton-Rockall Basin* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

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

Designation: Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove or avoid pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing fish farms in areas where they would be likely to impact on flame shell beds; exclude mobile/active gears (i.e. trawls, dredges and hydraulic methods) from the flame shell beds; and reduce or limit physical disturbance of flame shell beds by static fishing gear.

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

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

Designation: Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: exclude mobile/active fishing gears from areas of flame shell beds and serpulid aggregations; introduce management measures to limit or reduce the intensity of towed / active gears in areas of northern feather star aggregations on mixed substrata; and remove or avoid pressures associated with finfish farming from areas of flame shell beds, northern feather star aggregations and serpulid aggregations.

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**10. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart to the Sound of Jura* possible Nature Conservation MPA?**

Designation: Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

See our comments above. We support the management options of: limiting the use of mobile/towed active gear spatially and/or temporally.

Socioeconomic Assessment: Yes  No

Comments

All of the above:

Yes  No

Comments

**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  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options:

Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove or avoid pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing fish farms in areas where they would be likely to impact on maerl bed; reduce or limit pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing fish farms in areas where they would be likely to impact on burrowed mud (particularly the burrowing megafauna and mud volcano worm habitat) or sublittoral mud and mixed sediments communities; exclude mobile/active gears (i.e. trawls, dredges and hydraulic methods) from areas within Loch Sween where maerl beds and native oysters occur; and introduce management measures to reduce the intensity of towed / active gear in areas where burrowed mud and sublittoral mud and mixed sediment communities occur (particularly where there are aggregations of epibenthic species such as the mud volcano worm).

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**12. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Lochs Duich, Long and Alsh* possible Nature Conservation MPA?**

Designation:

Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove/avoid pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing fish farms in areas where they would be likely to impact on flame shell beds; reduce/limit pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing fish farms in areas where they would be likely to impact on expansion of existing finfish farms or proposed new developments in areas where there would be likely to impacts on burrowed mud (particularly in areas with fireworks anemones); exclude mobile/active fishing gears from the area within the site where flame shell bed occurs; and introduce management measures to reduce or limit mobile/active fishing on areas within the site where burrowed mud occurs.

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**13. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Monach Isles* possible Nature Conservation MPA?**

Designation: Yes  No

Comments

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments



All of the above: Yes  No

Comments

**14. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Mousa to Boddam* possible Nature Conservation MPA?**

Designation: Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove or avoid pressures associated with targeted sandeel fishing; and remove or avoid pressures associated with the use of demersal hydraulic gears.

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**15. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-east Faroe Shetland Channel* possible Nature Conservation MPA?**

Designation: Yes  No

Comments

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above:

Yes  No

Comments

**16. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west Orkney* possible Nature Conservation MPA?**

Designation:

Yes  No

This MPA covers an area which is likely to be a key migration route for Atlantic salmon and may be used as a marine feeding area for sea trout. We believe that there are likely to be additional benefits to these species. This is likely to be the case if the PMFs in question are managed appropriately. We support the designation of the North-west Orkney possible NC MPA.

Management Options:

Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to limit any future sand eel fishery in the area.

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**17. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west sea lochs and Summer Isles* possible Nature Conservation MPA?**

Designation:

Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options:

Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove or avoid pressures associated with marine disposal sites; introduce management measures to reduce or limit mobile/active fishing on burrowed mud habitats; remove or avoid pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing fish farms in areas where they would be likely to impact on flame shell beds, maerl beds, maerl or coarse shell gravel with burrowing sea cucumbers and northern feather star aggregations on mixed substrata; reduce or limit pressures associated with expansion of existing finfish farms or proposed new developments from areas of burrowed mud (particularly with tall sea pens) and circalittoral muddy sand communities. We particularly welcome reference to the on-going audit and review process. However, we understand that this process will be largely complete by April 2014 – does this timeline allow such factors to be taken into account?

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**18. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Noss Head* possible Nature Conservation MPA?**

Designation:

Yes  No

This MPA covers an area which is likely to be a key migration route for Atlantic salmon and may be used as a marine feeding area for sea trout. We believe that there are likely to be additional benefits to these species. This is likely to be the case if the PMFs in question are managed appropriately. We support the designation of the Noss Head possible NC MPA.

Management Options:

Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove or avoid pressures associated with marine disposal of dredged material in areas where they would be likely to impact on the horse mussel bed; exclude mobile/active gears (i.e. trawls, dredges and hydraulic methods); and remove or avoid pressures associated with further cable infrastructure in areas where there would be likely to be cumulative impacts on horse mussel beds.

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**19. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Papa Westray* possible Nature Conservation MPA?**

Designation:

Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options:

Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: exclude pressures associated with set nets (e.g. fyke, gill, trammel or tangle).

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

**20. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Rosemary Bank Seamount* possible Nature Conservation MPA?**

Designation:

Yes  No

Comments

Management Options:

Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**21. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Small Isles* possible Nature Conservation MPA?**

Designation: Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove or avoid pressures associated with dredge disposal sites from areas of fan mussel aggregations and horse mussel beds; reduce/limit pressures associated with new finfish farms in areas where they would be likely to impact on burrowed mud (particularly in areas with large epibenthic species including tall sea pen); exclude mobile/active gears from the areas within the site where horse mussel beds and fan mussel aggregations occur; and introduce management measures to reduce or limit the intensity of towed/active gears on burrowed mud, (particularly where there are aggregations of large, epibenthic species including tall sea pens).

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**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  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: exclude towed/active gear (including trawls, dredges and hydraulic methods) from areas of maerl beds, maerl or coarse shell gravel with burrowing sea cucumbers and seagrass beds; reduce or limit mobile/active gear from areas with burrowed mud; reduce or limit hydraulic dredging in areas with shallow tide-swept coarse sand with burrowing bivalves and ocean quahog; and seasonal restriction on the use of mobile/active gear on herring spawning grounds.

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**23. Do you have any comments on the case for designation, management options and socioeconomic assessment for *The Barra Fan and Hebrides Terrace Seamount* possible Nature Conservation MPA?**

Designation: Yes  No

Comments

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**24. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Turbot Bank* possible Nature Conservation MPA?**

Designation: Yes  No

Comments

Management Options: Yes  No

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  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.

Management Options: Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: remove or avoid pressures associated with new finfish farms and undeveloped consents as well as the expansion or relocation of existing finfish farms in areas where they would be likely to impact on flame shell beds, horse mussel beds and ocean quahog; reduce or limit pressures associated with expansion of existing finfish farms or proposed new developments in areas where there would likely be impacts on burrowed mud and sublittoral mud and mixed sediment communities; exclude mobile/active gears from the areas within the site where flame shell beds and horse mussel beds occur; exclude hydraulic dredging for burrowing bivalves from areas within the site where ocean quahog

occurs; and introduce management measures to reduce or limit the intensity of mobile/active fishing on sublittoral mud and mixed sediment communities and burrowed mud habitats.

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

Comments

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: Yes  No

Comments

**27. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Wyre and Rousay Sounds* possible Nature Conservation MPA?**

Designation: Yes  No

Protection of the highlighted features in this area, could also present wider benefits to Atlantic salmon and sea trout during their marine phase. On that basis we support the protection these features and the designation of this site.



Management Options:

Yes  No

We support the management options suggested in the management options paper. We are particularly supportive of the recommended management options to: limit development of new sites or expansion of current finfish farms; remove/avoid pressures associated with extraction of maerl; and exclusion of mobile/active gears (i.e. trawls, dredges and hydraulic methods).

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

Yes  No

Comments

### **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

**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.

Comments

**31. 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 the burrowed mud feature in the Fladens?**

Yes  No

Comments

**32. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V, do you have a preference or comments on the following combinations to represent these features:**

- South-West Sula Sgeir and Hebridean slope
- Or Geikie slide and Hebridean slope

Comments

**33. 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, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V?**

Yes  No

Comments

**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?**

Yes  No

Comments

**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  No

Comments