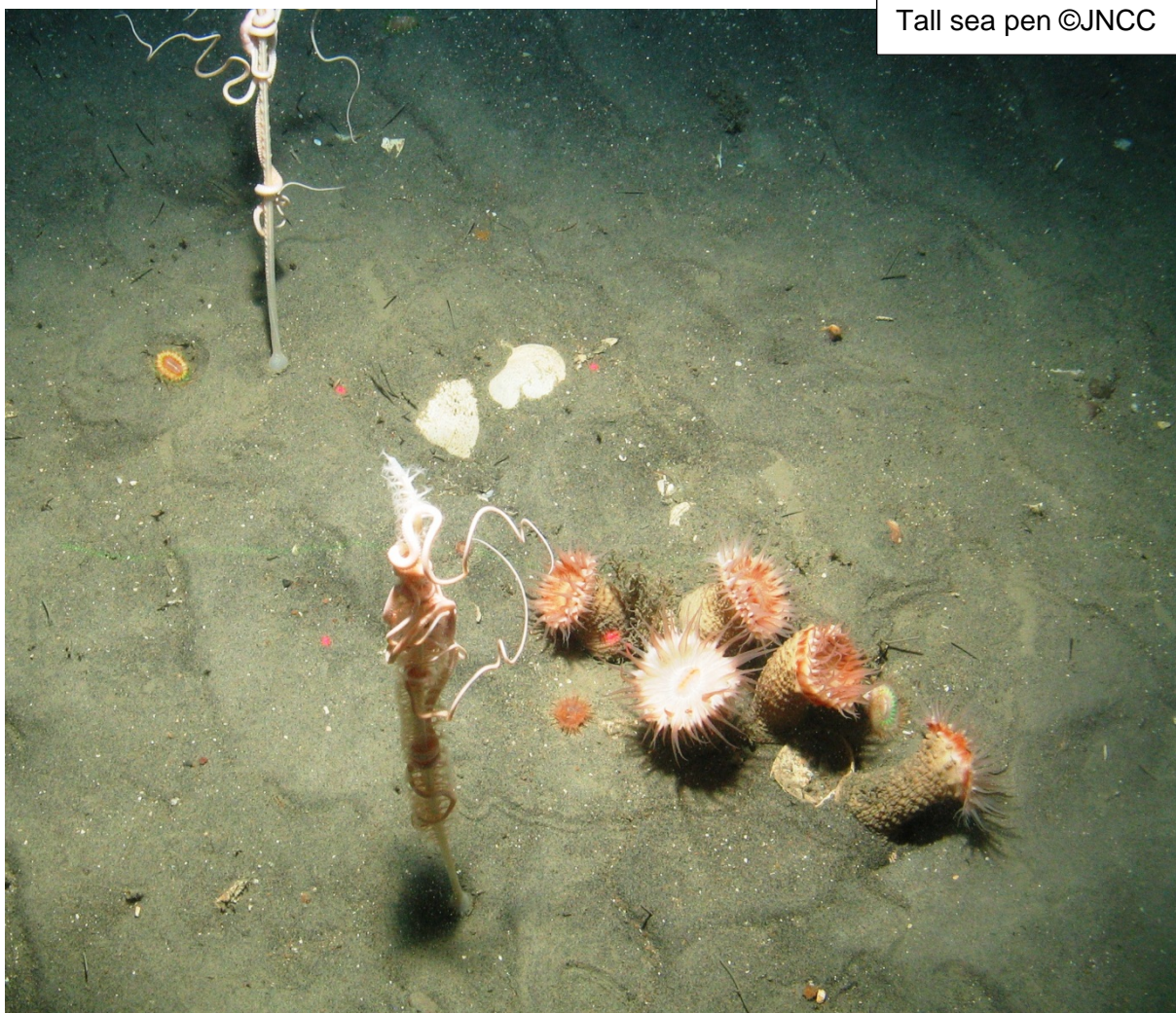


Copies of all the written responses received to a consultation exercise (except those where the individual or organisation requested confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH113XD, telephone 0131 244 4565).

All Scottish Government consultation papers and related publications (e.g. analysis of response reports) can be accessed at: Scottish Government consultations (<http://www.scotland.gov.uk/consultations>) The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. Depending on the nature of the consultation exercise the responses received may: indicate the need for policy development or review; inform the development of a particular policy; help decisions to be made between alternative policy proposals; be used to finalise legislation before it is implemented. Final decisions on the issues under consideration will also take account of a range of other factors, including other available information and research evidence.

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.



CONSULTATION QUESTIONS

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

Yes ✓ No

Comments I am an avid diver and am familiar with the diversity of life under the Scottish waters, having dived in many locations around the country for the last 14 years (approx. 500 dives in Scottish water). Although all my views are none scientific and from personal observation, I can truthfully say that I have seen the quantity and spread of the fauna, in general, reduce over the period of my diving experiences, especially in the areas where scallop/prawn dredging has been regularly undertaken. I am in favour of strong laws and policing that can stop this highly destructive fishing technique in areas where there is wonderful and fragile fauna such as the fireworks anemone, Icelandic cyprine (ocean quahog), sea pens, sea cucumbers etc. Non-destructive techniques (and sustainable I believe) such as creel fishing should be permitted in controlled numbers. I count myself as privileged to have seen so many wonderful and beautiful wild animals whilst diving around Scotland but fear that the opportunities for those younger than me to witness such wonder are diminishing. Protecting our waters without delay may be the only chance we have to save the fauna of our seas. I have felt for many years that out of sight is out of mind. No one would permit an equivalently destructive technique such as scallop/prawn dredging to occur on the land, so why in the sea? I am also in favour of limiting other commercial fishing in sheltered lochs and firths (such as trawling) but my personal experience of the effects of this is less as I am came to diving as, I believe, most of the stocks had been fished out. I hope that the scientists can come up with a way of controlling trawling in such NC MPAs that will allow recovery.

I will only reply below to my local area (Upper Loch Fyne) but please take it as read that overall I have support for the NC MPAs and for the strongest possible conservation methods in all of the suggested NC MPAs. I understand the need to consider the fishing communities but there comes a point where conservation must, sadly, come first. Government seems not to worry when whole communities are affected by factory closures or civil servant redundancies for the sake of lack of profit/money. However, governments seem to have been wholly reluctant over the years to administer similarly harsh news to commercial fishermen when it is clear that the sea's stocks and reducing and non-commercial species are being adversely affected as a result of some commercial fishing activities. I am hopeful that the new NC MPAs and associated MCOs etc may be the start of a change of heart and recognition of the damage that some of the commercial fleet is causing.

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

Comments

Management Options:

Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Management Options: 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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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 Aish* 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

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments

Management Options: Yes No

Comments

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

Comments The area suggested (Castleton to the head of the loch and Loch Goil) is appropriate and will capture the species that are recognised as requiring protection.

Management Options:

Yes ✓ No

Comments If NC MPA legislation by itself is not strong enough, then an MCO should be sought **without delay** to halt all commercial fishing activities in Upper Loch Fyne¹ that are indiscriminate (e.g. bottom dredging). Commercial creel fishing should be permitted (for Norway lobster) under arrangements that favour local creel fishermen up to a sustainable number (scientific evidence should be used to determine an appropriate maximum). Protected species are largely immobile (e.g. fireworks anemone) or slow moving and therefore the suggested management technique should be applied in perpetuity. Recreational line fishing, sustainable commercial/licensing hand-dived scallop fishing and water sports should be permitted. Net trawling should be considered for its impact on the designated species and included in the above measures if it is found to have even a small risk of detrimentally affecting them.

[¹ My comments on the NC MPA relate to my experiences of Upper Loch Fyne only as my knowledge and observation of Loch Goil is limited]

Socioeconomic Assessment:

Yes ✓ No

Comments Living on the shores of Loch Fyne in the suggested NC MPA, I can say that the dredgers from Tarbert/Campbeltown are active on a regular basis (may be an average of 2 or 3 boat-days/week) and with modern technology will often be seen to dredge close to the shore and fauna-covered walls (e.g. Kenmore and into Loch Shira). However, it is often the same boats that show themselves so this would suggest that the numbers using the area are small and hence the impact on the commercial fisherman should be small.

If the protected species begin to flourish once again to the levels I recall them to be several years ago, then the already popular diving destination of Upper Loch Fyne should become even more popular. It features regularly in diving magazines with articles promoting the destination. Divers are regularly seen in local establishments spending their money. Furthermore, there are 2 dive trip operators (based at Ardrishaig and Tarbert) who often use upper Loch Fyne for their operation. They introduce hundreds of divers every year to this area from around the UK. Without strong protection, the species cited are likely to continue the decline that I have observed over the

400 odd dives I have done in the loch over the last 14 years. This will not encourage the recreational diver and is highly likely to discourage this activity with an associated decrease in the benefits to the community.

All of the above:

Yes ✓ No

Comments My comments are based on my non-scientific observations over my extensive diving in the proposed NC MPA of Upper Loch Fyne. I have seen the fauna on the underwater walls smothered in silt following the activities of the dredgers. I understand that this is detrimental to the fauna. I have dived several hours after the area has been dredged for scallops or prawns. The water column (from almost the top of my dives down to the bottom depths) have sadly been full of what appears to be suspended animal matter and dense silt, easily recognisable from the usual, less obscuring and smaller suspended particles of silt/plankton. I can only assume that the burrowed fauna such as firework anemones, sea cucumbers etc had been mashed to a pulp. It was highly distressing to witness. The dredging had occurred at a depth that I could not get to so I could not view the results directly.

I can name areas of upper Loch Fyne that I have seen change a lot over the last 14 years in respect to the number of the species present (reduction) and the frequency/numbers spotted during dives. I can also state, although not with data, that I have observed a reduction in general biodiversity with the number of bottom dwelling fish such as scallops, various flat fish, lesser spotted catshark, gunard, scorpionfish, the little cuttle etc and other non-cited species observed during a dive becoming less, year on year. Although it is a non-scientific assumption, I would suggest that this is directly related to the bottom dredging activities apparent in the Loch that will indiscriminately affect these animals too.

Over the years I have observed a large increase in the number of dead (open) Icelandic cyprine shells (ocean quahog). Great if you are a shell collector but very, very sad for the biodiversity of the loch and this most special, long-living animal. I again make the unscientific assumption that this increase has been due to the more regular appearances of the dredging boats. In order to protect what we have left and hopefully let it have a chance to recover to what I knew 14 years ago, this destructive activity must be stopped in such low energy and delicate areas such as the NC MPA that I overlook and am so familiar with from my diving activities.

26. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *West Shetland Shelf (formerly Windssock)* 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

Comments

Management Options:

Yes No

Comments

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 No comment

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 No comment

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 No comment

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 See comments in question 1.

Thank You.