

## **CONSULTATION QUESTIONS**

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

Yes  No

### Comments

I think such a network is of critical importance, given the diversity of marine wildlife around our shores. It is, however, essential to include Scotland's seabirds and their feeding hotspots. Without doing so our seabird population will continue to decline.

## **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

In addition to your references to Black Guillemot which appear to be your favoured bird for protection, I would like to bring to your attention the Common Guillemot and Black-legged Kittiwake, sandeel feeders, whose numbers are also in decline. As a south-west coaster used to seeing kittiwakes on the nest as a child, I am greatly saddened by the loss of such a sight. To imagine the further loss of familiar species is heartbreaking.

Management Options:

Yes  No

### Comments

Since the decline in numbers of these birds is largely due to starvation of chicks in the nest, there has to be consideration given to supporting sandeel populations close to breeding sites.

Socioeconomic Assessment:

Yes  No

Comments  
Restrictions on sandeel fishing required.

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

I draw your attention to the variable breeding success of European Shag, declining numbers of Black-legged Kittiwake, Arctic Tern, Common Guillemot in this area, all being sandeel feeders.

Management Options:

Yes  No

Comments

Regulation of sandeel fishing.

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

In addition to Black Guillemot, European Shag, Arctic Skua, Arctic Tern (all inshore sandeel feeders), Black-legged Kittiwake, Common Guillemot (both offshore sandeel feeders).

Management Options:

Yes  No

Comments

Regulation of sandeel fishing

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

In addition to Black Guillemot, the continuing decline of European Shag, Black-legged Kittiwake, Common Tern (an inshore sandeel feeder), Common Guillemot must be addressed.

Management Options:

Yes  No

Comments

Regulation of sandeel fishing

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  
Common, as well as Black Guillemot, Arctic Tern, Black-legged Kittiwake, Arctic Skua, once again all sandeel specialists, are in decline here.

Management Options: Yes  No

Comments  
Preservation of sandeel stocks in known feeding areas

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

Black-legged Kittiwake, European Shag are of concern here.

Management Options:

Yes  No

Comments

Protection of known feeding grounds

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

With marine lifeforms recovering in the protected zone of Lamlash Bay, I would welcome an extension of this to the south of the island.

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

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

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

I urge you to designate the Firth of Forth Banks Complex as recommended by the Joint Nature Conservancy Council and Scottish National Heritage.

**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

Sandeels play such a key role in the survival of many marine life-forms in this area, not least the seabird population which require much greater consideration in the list of designated features for protection in this site. Seabird feeding grounds need to be given higher priority, particularly where the feeding of chicks is concerned. In addition to sandeel fishing regulation, I would also ask that, in this respect, more sensitivity is given to the siting of offshore windfarms and other marine energy generators.

**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

I quote from your own document "With the exception of black guillemot, seabirds have not been included in the list of MPA search features in Annex 3. However seabirds are recognised as an intrinsic and valuable part of Scotland's marine ecosystem and the list of MPA search features includes features which help to support seabird life stages."

I am deeply concerned that you have restricted your proposed protection for seabirds to Black Guillemots when their populations appear to be more stable than the others I have mentioned in Questions 2,3,6,13,19,21. I cannot concede therefore that you have adhered to the international agreement to create a complete or ecologically coherent network. Since a common factor in the decline of the species mentioned appears to be starvation of chicks on the nest due to parent birds' inability to reach their preferred foodsource (sandeels) with sufficient regularity their foodsource, and since I can find no mention of this species among marine lifeforms in Annexe 3, I fear that you have overlooked a key element in the marine ecosystem.

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