

Below is a response to the Scottish Government's consultation on proposals for a network of Marine Protected Areas - sent via Scottish Environment LINK's campaign page (www.savescottishseas.org/support-mpas-action)

Title of letter Recover our seas with Marine Protected Areas

Consultation response: In response to the Scottish Government's consultation on Marine Protected Areas questions 1, 28, 35 and 36:

I support the proposals for a network of Marine Protected Areas in Scotland's inshore and offshore waters, but believe more must be done to protect, connect and actively recover the health of our seas, which has suffered long-term decline over many generations.

Therefore, the Scottish Government must implement the ecologically best 29 Marine Protected Area proposals, as recommended by its own scientific advisors (Commissioned report no. 547 Advice to the Scottish Government on the selection of nature conservation Marine Protected Areas (MPAs) for the development of the Scottish MPA network - <http://www.snh.gov.uk/docs/A990246.pdf>). Evidence suggests that the features within the Firth of Forth Banks Complex are of functional significance to the overall health and diversity of Scotland's seas more widely. The Firth of Forth Banks MPA therefore must be designated, because it is JNCC's preferred proposal and the suggested alternatives to the site do not make equivalent contributions to the network.

I do not believe the proposed network to be ecologically coherent. I firmly urge the Scottish Government to extend the MPA proposals to protect vulnerable species excluded from the proposed network. There is already good evidence to support the immediate inclusion of whales, dolphins, basking sharks and nationally important populations of seabirds, such as puffins and kittiwakes. These - and those species already dropped from the proposals; spiny lobsters, heart cockle aggregations, burrowing anemones - must be added to the network. The network will only be ecologically coherent when all species and habitats that can benefit from spatial protection are adequately represented and when sound, properly-resourced science shows it to be based on the ecological linkages between the different MPAs.

International recommendations say a network of MPAs must interact and support the wider environment and the Scottish Government has a legal obligation to enhance Scotland's seas. For each MPA, the strongest and most effective management must be in place so that recovery is possible within and beyond the boundaries of the site. Zonal management that puts in place measures to protect only the remaining coverage of species and habitats is not enough, given the context of ecological decline documented by Scotland's Marine Atlas.