

MPA CONSULTATION QUESTIONS

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

Yes

Whilst it is recognised the Scottish Government are promoting further expansion of fish farming sites, the MPA network must acknowledge the potential damage this could cause to priority habitats such as maerl, seagrass etc. This equally applies to dredging. It is very much hoped some regulation be proposed to protect and thereby gain maximum benefit from having MPA's. This is an opportunity we must take to safeguard our seas.

Individual possible Nature Conservation MPAs

2. Do you have any comments on the case for designation, management options and socioeconomic assessment for the possible Nature Conservation MPA(s)?

SMALL ISLES MPA

Designation:

Yes

This is a request to extend the boundary of the Small Isles MPA to include Lochs Scavaig, Slapin and Eishort in South Skye. These three lochs comprise the only sea loch system on Skye with no active fish farm activity although there are currently aquaculture expansion plans for this area (failed attempt by Marine Harvest in January 2013 and currently screening and scoping for three large fish farms in Lochs Slapin and Eishort by Hjaltland). The community were recently alerted to the rich seashore biodiversity by work undertaken voluntarily by Dr James Merryweather with 26 new records confirmed. We know there are three maerl beds in Loch Slapin and Eishort (ref: Ospar Background Document for Maerl Beds 2010) but do not know exact locations and extent of the beds. There are also seagrass beds, circumlittoral muds with sea pens, intertidal under-boulder communities, kelp and seaweed communities on sublittoral sediment and oyster beds. Given the extent of flame shell beds in the local area, there is the possibility these also exist.

Recognition is being given to this rich biodiversity and over recent months divers have started surveying the seabed but as this is being done on a totally voluntary basis when time and weather allow, the results are random. Evidence of dredging damage has been found along with healthy maerl and seagrass beds and we recognise this area might be classed as 'recovering' post fish farming and dredging.

Orcas, minke whales, dolphins and basking sharks use these lochs and given the basking shark project around Canna, it is likely these lochs play a part in this success story.

From recent surveys, I understand the sea trout numbers are now increasing which further adds to the case to protect this area.

Given all of this, I would request these lochs be properly surveyed to identify and

protect habitat and species applying the 'precautionary approach' as agreed at the Rio Declaration on Environment and Development in 1992.

I realise this request is rather late but hope, if it is not possible to add this area to the Small Isles MPA, perhaps a Research & Demonstration MPA be developed.

Management Options:

Yes

I believe the local community would welcome the opportunity to manage and preserve the priority habitats and species and encourage recovery of the maerl beds as their importance is recognised as nursery beds for scallops, prawns etc bringing an element of sustainability to these waters.

Socioeconomic Assessment:

Yes

Employment in South Skye is limited and extending the Small Isles MPA designation would support and safeguard the following:

- small fishermen, creels and small net fishing
- scallop divers
- two existing mussel farms (Loch Slapin and Loch Eishort)
- wildlife tourism boats which operate from Elgol
- possible development of angling tourism if marine fish populations are allowed to recover
- sea kayak routes

In addition, the iconic scenery around these lochs attract tourists and I understand SNH's wild land designation potentially includes the Cuillen hills which could partner an MPA in this area.

All of the above:

Yes

If Lochs Scavaig, Slapin and Eishort were designated an MPA, this would provide an opportunity to preserve an area rich in biodiversity and allow benthic damage to recover. This would go hand in hand with safeguarding local businesses and possible tourism development as well as the obvious environmental benefits.

Sustainability Appraisal

- 3. Do you have any comments on the Sustainability Appraisal of the MPA network as a whole?**

No

Insert comments

Final Thoughts

- 4. 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?**

No

All MPA search features found in any given MPA should be protected and not just one or two habitats or species. If they are designated as requiring protection then they should be protected.

- 5. 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

It is very encouraging the Scottish Government are developing an MPA network, however, it is giving out mixed messages in that various government bodies' mission statements to protect habitats and species back this but the Government's own objectives to increase farmed salmon production counteracts. There should be a common strategy to gain public support and belief in protecting Scotland's seas. Perhaps recommendation to use closed-container tanks (either on land or sea) could be investigated.

Thank You.