

28/10/13

MPA 10001

MPA Network Consultation
Scottish Government
Marine Planning and Policy Division
Area 1-A South
Victoria Quay
Edinburgh
EH6 6QQ

23 October 2013

Dear Sirs

I write as an individual responder, and as one of the editors of The Birds of Scotland (Scottish Ornithologists' Club, 2007), to express my concerns about the inadequacy of the current proposals to create Marine Protected Areas in Scotland.

I would like to emphasise at the outset that Scotland is home to 45% of Europe's breeding seabirds; we therefore have an international responsibility to ensure their long term future. But I must also refer to SNH's recent report that the number of breeding seabirds in Scotland has decreased by 46% since 1986. SNH acknowledges that a number of factors contribute to this continuing decline, including weather conditions, predation, and rising sea temperature caused by climate change, but food shortages are a major contributory factor.

Whilst many of these birds' breeding sites on shore are protected under a variety of legislative measures, their feeding areas are not protected at all, and recent research has shown that many species are having to travel further and further in search of food. I therefore believe that important feeding areas for seabirds must be given much more prominence in designating MPAs.

In response to certain of your questions:

Question 1:

I fully support the development of an MPA network in Scotland's seas. MPAs are needed to protect all our marine wildlife, but the network will be inadequate unless we include protected areas for seabirds to feed. They need quite as much protection on their feeding grounds as they do at their breeding sites.

Questions 2,3, 6, 13, 19 and 21:

All seabird species must be protected in these areas. Black Guillemots must be included as protected species in these areas.

Questions 28 and 29:

The proposed Firth of Forth Banks Complex MPA must be designated, as was recommended by JNCC and SNH. Sandeels in this area are a vital food source for seabirds, and are already known to be getting smaller and fewer (research by Centre for Ecology and Hydrology), possibly as a result of ocean warming, yet they have a vital ecological function on which other marine animals, and seabirds, are heavily dependent. Seabirds must be added to the list of designated features and must be protected at this vital site.

Question 35:

The network cannot be complete unless seabirds are protected on their feeding grounds. The Scottish Government is committed to an international agreement to create an ecologically coherent network which is 'representative' of nationally important species. The Government's commitment also refers to areas which are 'particularly important for highly mobile species, such as certain birds.'

I repeat my earlier point that Scotland has an international as well as a national responsibility. Much has been done over past years to protect the areas where these birds breed, now it is vital that MPAs be introduced to protect the areas where they feed. Whilst acknowledging the many other factors that influence successful breeding, insufficient food results in mature birds being so out-of-condition that they fail to breed at all, or in young birds failing to fledge. We need to take every possible action now to stem the declines so recently confirmed by SNH.

Yours faithfully



Mr M W Betts CBE