

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

To whom it may concern,

I am writing in response to the Scottish Government consultation on Possible Nature Conservation Marine Protected Areas. From Scotland's Marine Atlas it is clear that the seas around Scotland are in turmoil, with concerns and declines over most of the seabed, declines in common seals, seabirds and sharks, skates and rays, and ongoing concerns with fish stocks in many areas. Within a system that puts the marine environment at the centre of marine planning, I believe a network of well-managed Marine Protected Areas is essential to help reverse these historic declines and enhance the many important benefits the sea provides us all.

In answer to question 1, I firmly support the development of an MPA network in Scotland's seas. Of the 33 MPA proposals in the consultation, I want to see at least the 29 ecologically best choice sites designated as nature conservation Marine Protected Areas in line with scientific advice.

In answer to question 28, the Firth of Forth Banks MPA proposal must go forward to best represent offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the southern North Sea in line with JNCC advice. The other choices presented do not make the same contribution to wider North Sea ecosystem function, are not ecologically equivalent and therefore are not acceptable alternatives. Sandeels and seabirds should also be protected features at Firth of Forth Banks.

In answer to question 30, core Central Fladen must be protected in line with scientific advice and I support the 'Central Fladen pMPA only' option to be included in the network. This would be the most ecologically coherent option, providing scope for tall sea pen recovery beyond what may be a remnant population in 'core' Central Fladen.

In answer to question 34, I do have a comment on the Sustainability Appraisal. I believe the Sustainability Appraisal does not fully account for the socio-economic benefits that could arise from the proposed MPA network. For example, a recent study revealed that recreational diving and angling in 20 of the proposed MPAs in Scotland is valued at between £67 million and £117 million per year. In addition, divers and anglers questioned said they would make a one-off payment collectively worth between £142-£255 million to see these sites protected and damaging activities stopped. Similar studies are needed to demonstrate the benefits of the Scottish MPAs to other user groups.

In answer to question 35, even if the best 29 sites and the remaining four search locations become MPAs as I would like, I still do not view this to be an ecologically coherent network. Other species in need of MPA protection - such as spiny lobsters, heart cockle aggregations and burrowing anemones - must be added to future iterations of the network. Further MPAs

for common skate and nationally important MPAs for seabirds are also needed. I will only consider the network ecologically coherent when all species and habitats that can benefit from spatial protection are adequately represented and when robust science shows the network supports and enhances the ecological linkages between the different MPAs.

In answer to question 36, I do have further comments. The Scottish Government has a legal obligation to enhance Scotland's seas and, according to international recommendations, the MPA network must support the wider marine environment. For each MPA, effective management must therefore be in place so that species and habitat recovery is possible both within and beyond the boundaries of the site. Zonal management that protects only the remnant extent of marine species and habitats, particularly of vulnerable benthic features, is not enough given the context of ecological decline documented in Scotland's Marine Atlas.

North-west sea lochs and Summer Isles

This is an amazingly diverse site with significant diversity. There are three species of sea pens found in this area and one of which, the tall sea pen is rare. This is in addition to maerl beds and flame shell beds which make up this complex habitat and need protection.

I am replying as an individual and am happy for my response and name to be published on the Scottish Government website, but not my address.

I understand that my name and address are required to identify me as an individual, so that my response can be included in the consultation analysis.

I am content for the Scottish Government to contact me again in relation to this consultation exercise.

Yours faithfully



Elizabeth heaver

