

## **CONSULTATION QUESTIONS**

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

**Yes**

It is vitally important that MPA sites in Scottish waters are designated in line with the scientific advice provided by JNCC, which has recommended that at least 29 of the 33 proposed MPAs are designated.

Scotland must designate a range of MPAs that provide protection for as large a range of species as possible. More must be done to harness public support for the network and we must look to other nations who are well ahead of us in the conservation of their waters.

The Scottish Government's Scottish Biodiversity Strategy 2020 Challenge document, published mid-2013, states that "Scotland's seas and coasts provide rich natural harvests and varied ecosystem services, including climate control, coastal protection, nutrient recycling, health benefits and leisure opportunities, as well as supporting a diverse biodiversity that adds value to local tourist economies." And continues: "An ecologically coherent network of Marine Protected Areas will protect the best of Scotland's marine nature, promote sustainable use and aid recovery of commercially valuable fish and shellfish. An innovative system of marine planning will include all those with an interest in the marine environment to ensure the sustainable management of our seas, coasts and islands." As a regional east-coast biodiversity partnership we fully endorse these statements and will be incorporating the relevant sections of the Scottish Biodiversity Strategy within the 2<sup>nd</sup> Edition Tayside Biodiversity Action Plan to be published in 2014.

### **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

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above:

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

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

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**

The ocean quahog, discovered during surveys undertaken by the oil and gas industry is a mollusc that can live to be around 400 years old. It is, however, in decline because of its vulnerability to trawling and dredging. It is important to designate this site to ensure the correct conservation management of this species. The site is also important for offshore deep sea mud and sand and gravel communities which need to be safeguarded.

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:

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

Management Options:

Yes  No

Comments

Socioeconomic Assessment:

Yes  No

Comments

All of the above:

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:

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:

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:

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

The proposed 'Loch Sunart to the Sound of Jura' MPA, if extended slightly, would protect an important seabird foraging area at the Gulf of Corryvreckan. RSPB's seabird tracking data from around Scotland show that seabirds do aggregate and that important areas can be identified and protected. This MPA has been highlighted by this research and it is important that it is conserved, based on this

evidence which shows that seabirds are feeding in the area.

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:

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: 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

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: 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: 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: 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

North-west Orkney holds a spawning stock important to much of the North Sea ecosystem. Protection of sandeels – a prey species heavily relied upon by seabirds and other species- must be designated and managed effectively.



The RSPB estimate that, in 2000, £1.3 million of tourism spending could be attributed to Orkney's birds making it very important to the local economy, something that is mirrored in many areas of Scotland. The Scottish Government's own figures show marine wildlife tourism contributes £63million to the Scottish economy annually. This has the potential to be developed further.

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: 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: 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

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: 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: 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

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: 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

Management Options: Yes  No

Comments

Socioeconomic Assessment: Yes  No

Comments

All of the above: 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: 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: 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: 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: 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: 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  | <input type="checkbox"/>            |
| Turbot bank and Norwegian Boundary Sedimentary Plain                                  | <input type="checkbox"/>            |
| Or Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain | <input checked="" type="checkbox"/> |

Research by JNCC the government agency JNCC shows that from assessment of the evidence that substituting the Forth Banks Complex for two alternatives does not make equivalent contributions to the network to that made by the Firth of Forth Banks Complex which is a unique ecosystem rich in wildlife. Its banks of sands and gravels support populations of Sandeel, which in turn support larger fish, seabirds and marine mammals. This Complex is considered to be of vital importance to the ecological health of Scotland's seas according to government advice and protection is urgently needed.

The two alternative proposals do not meet the guidelines for consideration as Nature Conservation MPAs. The lack of diversity indicated on the basis of predictive data at the two alternative sites highlights that they are of lower biodiversity and geodiversity conservation value than the Firth of Forth Banks Complex MPA proposal. Would failure to designate the Firth of Forth Banks Complex as an MPA in favour of the alternatives proposed be contrary to the government's own advice and guidelines?

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 as this area is one of the most important sandeel areas on the Scottish east coast.

**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

**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 X
- The tall sea-pen component of Central Fladen, plus Western Fladen
- Or the tall sea-pen component of Central Fladen, plus South-East Fladen.

Core Central Fladen must be protected in line with scientific advice and the 'Central Fladen pMPA only' option seems most suitable 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.

**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?**

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?**

No



Comments

## **Sustainability Appraisal**

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

**Yes**

Does the Sustainability Appraisal fully account for the socio-economic benefits that could arise from the proposed MPA network? Research has shown that recreational diving and angling in 20 of the proposed MPAs in Scotland is valued at between £67 million and £117 million per year. Many users of sites would perhaps even pay to see their sites of interest protected and damaging activities stopped. Have similar studies demonstrating the benefits of the Scottish MPAs to other user groups been carried out?

## **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?**

**No**

The Scottish MPA network will only be ecologically coherent when all species and habitats that can benefit from spatial protection are adequately represented. The four remaining locations referred to by JNCC which, we are led to believe, will result in MPA proposals in 2014 will hopefully protect Basking shark, cetaceans such as Minke whale, Risso's dolphin, White-beaked dolphin, and less visible but very important Northern sea fan and sponge communities, shelf banks and mounds.

We feel that Scotland's internationally important seabirds require protected sites at sea and that seabird species should be used as indicator species to prioritise conservation measures and maintain long-term monitoring. As the Black guillemot population is not in decline, few management proposals have been mooted. However, we gather RSPB Scotland proposes precautionary restrictions to 'set net' fishing in the areas to safeguard against entanglement, and to ensure biosecurity is undertaken to prevent invasive species causing serious problems, for instance rats populating islands on which there are ground-nesting birds.

We agree with the RSPB that if the best 29 sites and the remaining four locations become MPAs this still may not be an ecologically coherent network.

The Scottish Government has the power to create MPAs for seabirds now. MPAs can help seabirds build resilience to climate change and food shortages, and will protect them against badly sited developments at sea. The current proposals only include protection for Black guillemot – the Scottish population of which is stable and therefore not an urgent priority.

A network which protects one species of seabird (and only 39 species and habitats in total) is not ecologically coherent - a duty under the Marine (Scotland) Act 2010. Nor should just seabird species be included in the species list – offshore turbines can cause issues with migrating birds (some of which are particularly badly affected as they fly quite high), as well as wildfowl and bat species. Water-based turbines may affect cetacean routes and feeding areas and all these must also be included in the Species List.

**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**

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.

Management of MPAs must achieve the protection and, where appropriate, enhancement of the health of Scotland's seas as is a duty in the Marine (Scotland) Act 2010. The current management proposals protect the *status quo* in most areas. We support strong management throughout MPA sites.

What are the attempts to assess the socio-economic costs of the MPAs proposals based on? What do we know about the potential benefits of having a well managed marine environment? Locally and nationally income generated by a healthy marine ecosystem can be extensive: "in 2000, £1.3 million of tourism spending could be attributed to Orkney's birds. The Scottish Government's own figures show marine wildlife tourism contributes £63million to the Scottish economy annually" (RSPB, 2013). There is still enormous potential to increase a Scottish tourism and eco-tourism focus on coastal and marine areas without over-exploiting the wildlife it highlights and to be world leaders in setting Codes of Practice for marine craft, as well as industrial fishing and aggregate ships. Overall, what could the economic benefits be in all sectors throughout the country?