

CONSULTATION QUESTIONS

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

Yes No

Wester Ross Fisheries Ltd. supports the principle of the development of a network of MPAs which will protect and safeguard specific species and features which are important to maintaining the biodiversity of Scotland's seas. The existing network of Natura 2000 areas (including SPAs and SACs) will be enhanced by the proposed MPAs leading to a coherent network of protected areas. Our support for the proposed areas is qualified by the essential requirement that aquaculture industry is permitted to continue to develop in appropriate locations which may include areas which are proposed MPAs.

As other fish farms do, we operate in inshore sea lochs which are proposed to be included as a MPA area (North-west sea lochs and Summer Isles MPA). It is important to make the point in this consultation that we have existed for many years, operating in a fully sustainable manner under the terms of existing regulations. Our company would like to ensure that we will be able to continue to operate and develop by ensuring we continue to be both economically viable and technologically up to date, while taking account of the species and features which are offered protection under the MPA scheme.

The scale of some of the MPAs is also of some concern to us since it seems the areas relate more to geographically convenient lines drawn on a map rather than to the specific locations of species to be protected.

The lack of knowledge on locations of specific features or species should not be used to increase the size of an area to the detriment of the economic activities carried out in that area. A proportionate balance must be reached to meet the MPA objectives whilst not damaging established and important economic activities.

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:

Yes 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: Yes 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 No

Comments

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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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 No

Comments

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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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 No

Comments

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

The size and the scale of the designated area to be protected is considerable. The distribution and scale of the species and features to be protected is diversely spread across this wide area. The designated area relates more to geographically convenient lines drawn on a map rather than to the specific locations of species to be protected. The area should be reduced to focus measures on specific locations where features can be protected.

Management Options:

Yes No

The management options produced for the NW sea lochs area describe the broad terms of dealing with MPA designation but do not answer the fine detail or questions around the practicalities of developing finfish aquaculture in this area. The make-up of any stakeholder group which may decide on future management measures and will determine the future of my business and ability to adapt to changes in the future. As a small business which only operates in this proposed MPA, this has potentially significant effects on my business.

Socioeconomic Assessment:

Yes No

The socioeconomic assessment only details the actual costs associated with additional surveying and applications for licences. In reality the costs are potentially much greater, with restrictions on potential new developments, improving efficiencies and safety. Future investment may be at greater risk and there is a possible displacement of any new sites to locations which are more costly to operate. The social costs are not really detailed to any great extent. Our company employs local people in rural locations, supporting fragile areas in the rural economies. If MPA designation restricted or risked the future of our business activities, this could have a negative effect on the social sustainability of the rural areas we operate in.

All of the above:

Yes No

The quality of the environment in which we farm is vitally important to our business and its future success. Our activities are low impact and sustainable and we take great pride in looking after the environment in which we grow our fish. The protection of our environment is important and we support the concept of protecting the marine environment on which we rely on. There does need to be a balance between the scale of protection and the activities which use this environment. Thought needs to be given to the scale of protection to ensure important species get the protection they need whilst allowing activities the flexibility to develop sensibly and considerately.

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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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: Yes 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
- Turbot bank and Norwegian Boundary Sedimentary Plain
- Or Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain

Comments

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

Comments

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?

Yes 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?

Yes No

Comments

Sustainability Appraisal

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

Yes No

Due to the nature of the socio-economic assessment and the way it was required to be carried out, only the costs associated with extra monitoring and regulation could be included. These are costs which can be quantified easily. The potential costs incurred by the finfish aquaculture sector include the risk to future investment, delays in obtaining permission to create new sites and the inability to expand or develop a site to make it more efficient. These costs are difficult to quantify and verify and are therefore not included in the analysis. This does not mean they do not exist and this should be taken into consideration.

The approach to displacement within the proposed MPAs is a sensible one. This is based around the requirement that any changes / new sites are not situated where they have a significant effect on the protected features / species. There may be indirect displacement where companies decide that applications for new sites in a proposed MPA do not merit the additional costs and uncertainty which are either the direct costs of monitoring or potential costs as described above. The statement explaining that existing consents will not be reviewed is welcomed by the industry. A sensible approach to changes in existing consents should be taken where they do not adversely impact the protected feature / species.

There have been no alternative locations suggested for the proposed inshore / sea loch MPAs and this is disappointing due to the overall number of proposed MPAs which affect the finfish aquaculture sector.

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?

Yes No

As a company we do not have any specific preference, but as a whole network the proposed areas cover a very significant geographical area. It would be our preference to reduce the overall size of the areas to best protect the species and features in question. The current 'broad brush' approach is inappropriate and needs to be more targeted to ensure the species and features get the protection they need.

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 No

The Management Options will be a crucial part in establishing how current activities and protected species and features interact. The management options papers provide a useful start for this process. However, it is only once the stakeholder groups are set up that any meaningful management decisions will be made. It is important for any stakeholder group to clearly represent the industries and activities which occur in the area, this approach would help in all parties understanding the legitimate expectations of the companies involved in regard to their business competitiveness. There is a risk that single issue pressure groups could hijack meetings and discussions for their own aims rather than for the benefit of the MPA.

Management options and the effect on future opportunities for existing water body users and industry stakeholders:

A number of the proposed MPAs are located in areas that have existing salmon farming activities, with a wide range of licensed and consented sites and facilities. It is the industries understanding that there would be no likelihood of changes being sought with regard to existing operations and consents. Whilst that position is to be acknowledged, it is necessary to seek some clarity about the flexibility measures within any future designated MPA. Industry will continue to upgrade both site and production facilities as it strives to improve performance and output. There is a rolling plan to implement the latest technological developments on an area or site basis. In order to achieve this in any designated MPA it will be necessary to have scope for site expansion or variation. This could, for instance, take the form of an increase or consolidation of production in one or more sites, whilst corresponding site capacity in other sites in that area could be reduced so as maintain the same overall 'footprint'.

The social benefits of the finfish aquaculture sector have not been taken into consideration in the socio-economic assessment. The number of well-paid jobs provided in remote and rural locations has a significant effect on both the rural economy and the social sustainability of these areas. If the proposed MPAs restrict the areas available for future development, this could have significant effects.

Displacement:

In the Strategic Environmental Assessment Report (August 2013) the issue of displacement of aquaculture sites is detailed (page 59). A clarification is required since the final sentence details "*There is no policy to review existing consents.*" The consents which this statement applies to are not detailed. It could be viewed that the consents in question relate to planning permission, CAR licence, Crown Estate lease and business authorisation, however it is not clear that Marine Scotland would have the competence to review these consents either in future MPAs or outwith MPAs.