

## **How to respond to the MPA consultation by post**

### **Responding to this consultation**

You are able to respond to this consultation by post by 13 November 2013 using the form overleaf.

**Please send your response with the completed Respondent Information Form (see 'Handling your Response' below) to:**

MPA Network Consultation  
Scottish Government  
Marine Planning and Policy Division  
Area 1-A South  
Victoria Quay  
Edinburgh  
EH66QQ

We would be grateful if you would use the consultation questionnaire as this will aid our analysis of the responses received. This consultation, and all other Scottish Government consultation exercises, can be viewed online on the consultation web pages of the Scottish Government website at <http://www.scotland.gov.uk/consultations>

### **Handling your response**

We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the **Respondent Information Form** which forms part of the consultation questionnaire as this will ensure that we treat your response appropriately. If you ask for your response not to be published we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government are subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

## MPA CONSULTATION QUESTIONS

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

Yes

The effective implementation of a MPA Network around Scotland can help to protect and recover marine habitats some of which we believe are of importance to valuable fin-fish species including Sea trout (sea-going brown trout), populations of which collapsed around Skye during the 1980s and 1990s.

Even after MPA network designation, there will still be much to do to recover more than a small proportion of the MPA search features and priority species that have been lost since the 'three mile limit' was removed in the mid 1980s.

### 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)?

INSERT RELEVANT MPA NAME(S) HERE    pSmall Isles MPA

Designation: Yes

We are focussing on this possible MPA for two reasons:

1. the islands of Rum and Eigg are within the area covered by the Skye Fisheries Trust. Rum has three rivers in which we believe sea trout are present.
2. we support calls by other organisations and individuals **that the Small Isles MPA should be extended to the coastline of Skye to include the sea lochs of southern Skye, i.e. lochs Scavaig, Slapin and Eishort and sea areas around the Isle of Soay**. In 2013 it became evident to the Skye Fisheries Trust that the sea lochs into which the Coruisk, Camasunarie, Strath Mor (by Torrin), Eishort, Ord, and Allt a' Ghlinne river systems drain represents one of the most important areas for sea trout around Skye. During the 1960's, the average annual rod catch of sea trout for the Camasunarie and Coruisk systems was over 500 fish and included fish of up to 18lb. Although catch figures for other rivers have not been obtained, based on areas of freshwater habitat available to sea trout in respective river systems, the combined rod catch of sea trout for the south Skye sea lochs area as a whole is likely to have exceeded 1,000 fish per year. In terms of importance to sea trout in Scotland, this area is therefore comparable to the more famous areas around the mainland of Scotland such as Loch Laxford (River Laxford System) and Loch Ewe (Loch Maree system). We recognise that for sea trout to survive and grow well at sea, inshore marine habitats need to be protected.

Following recent discoveries by members of SLEF [Skye and Lochalsh Environment Forum] and other information gathered from divers including

commercial scallop divers; it has become evident that this MPA would make a more valuable contribution to Scotland's MPA network if the boundary was extended at least as far as the coastline of Skye to include the sea areas around the Isle of Soay, Loch Scavaig, Loch Slapin and Loch Eishort.

This would enable inclusion of additional areas of MPA search features: Maerl beds, Seagrass beds (both habitats which believe to be of importance to the animals upon which sea trout feed on), Burrowed mud habitat, Blue mussel beds, Kelp and seaweed communities on sublittoral sediment, low or variable salinity habitats, Native Oysters, and other Scottish marine priority species, including Sea trout, and basking shark (for which the area remains a MPA Search Area)\*.

If it is considered inappropriate to consider adding on the south Skye sea lochs area to the possible Small Isles Nature Conservation MPA for reasons of rigid policy or lack of information at this late stage in the process, we would seek that a **Research & Demonstration MPA** is developed to adjoin the Small Isles MPA, which would enable a thorough ecological assessment of the south Skye sea lochs area prior to allowing any potentially damaging developments to proceed further within this area (e.g. large open-cage salmon farms). Skye Fisheries Trust would seek to develop an R&D MPA in collaboration with other local organisations and local fishermen, to record marine habitats and biodiversity and to review options for future development to ensure that they can be compatible with the recovery of valuable marine habitats, fish populations and other biota of economic importance.

\*see appendix 1

Management Options: Yes and No

With regard to the proposed extension to this MPA, we would seek to protect and recover Maerl beds, Seagrass beds and other sea weed habitats because of their value to sea trout and to other species of fisheries importance, and to protect all other MPA search features and priority species which occur within this area from further degradation (c. as proposed for the possible North West Sealochs and Summer Isles MPA).

Socioeconomic Assessment: Yes and No

Recovery of marine habitats would help valuable wild fish populations including sea trout, herring, cod, haddock, various flatfish and other species; and could help to support and regenerate a valuable angling tourism industry.

The area is also of importance for shellfish farming and scallop diving; local scallop divers report a collapse in the scallop populations due to unsustainable and very damaging scallop dredging of areas such as maerl beds and coarse sediment over the past 20+ years. If the seabed was better protected, shallow areas in these lochs would produce more scallops and provide more employment for scallop divers and other inshore fishermen than at present.

Extending the MPA designation would support and safeguard a growing wildlife tourism industry in the south Skye sea lochs area (e.g. tour boats from Elgol).

The south Skye sea lochs area has some of Scotland's finest and most iconic landscapes and seascapes; these could also be safeguarded in parallel with MPA development, further helping to attract recreational anglers to the area upon which

interest and funding for the management of sea trout fisheries depends.

All of the above:

Yes

A socio-economic assessment of extending the Small Isles MPA to include sea areas around the Isle of Soay, Loch Scavaig, Loch Slapin and Loch Eishort is required. We believe that an MPA extending to this area would be of overall benefit to local people, offering a wider range of opportunities for sustainable employment than at present.

### **Sustainability Appraisal**

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

No

### **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

To achieve ecological coherence, SNH needs to consider the role of finfish and shellfish species, traditionally regarded as only of importance to commercial fisheries (under Marine Scotland's remit) within marine ecosystems.

Fish species which can be of 'keystone' importance within 'natural' inshore marine ecosystems around Scotland include **herring** which spawn on the seabed (and which can be an important food for salmon and sea trout), sea trout, salmon and juvenile gadids. None of these were included on the list of MPA search features. Therefore, we do not believe that a 'natural' ecosystem approach has been followed.

Even after the proposed MPA network has been designated, larger areas of the sea will remain unprotected than protected. For this reason, it is possible that, for Scotland as a whole, there will be a continued net loss rather than a net recovery of assets such as maerl beds and eelgrass beds in Scottish waters; and continued losses of fishes which depend upon the careful management of marine habitats. Outwith designated MPAs (and other designated areas) our understanding is that marine nature will continue to be subject to damage and destruction?

**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

The MPA network is a step in the right direction following almost 30 years of unprecedented damage and destruction to inshore marine habitats and wildlife, including sea trout and stocks of other important species, following the removal of the '3 mile limit'.

To complement designation of a MPA network, additional measures will be required to safeguard and recover marine biodiversity and the productive value of inshore waters around Scotland.

Well done to the SNH and Marine Scotland teams for progressing the Scottish Government's MPA programme thus far. We recognise that much effort from many individuals has gone into developing the proposals. More work required!

## Appendix 1: Some records of MPA search features within the lochs Eishort, Slapin and Scavaig area

**From:** James Merryweather [<mailto:j.merryweather369@btinternet.com>]

**Sent:** 08 November 2013 17:34

**To:** Roger Cottis; CUNNINGHAM PETER; Eileen Armstrong; Arthur Sevestre; David Ashford

**Subject:** LOCH EISHORT RECORDS

Here, as promised, are my new records from Loch Eishort (including bits from Loch Slapin) for you to incorporate as seems fit in your Small Isles MPA response.

I haven't yet worked out what I'm going to do, but if you have any queries please contact me and ask.

Good luck, James.

Dr James Merryweather  
The Whins  
Auchtertyre  
by Kyle of Lochalsh  
IV40 8EG  
01599 566291

<b>Loch Eishort/Slapin Biology 2013</b>						
<i>N.B. Except rows 6, 13 &amp; 14, includes only sites that have been visited by the compiler:</i>						
James Merryweather, The Whins, Auchtertyre, Kyle of Lochalsh, IV40 8EG; 01599 566291 <a href="mailto:james@slf.org.uk">mailto:james@slf.org.uk</a>						
<b>Biodiversity Action Plan Priority Habitats</b>	<b>JNCC code</b>	<b>Present</b>	<b>Suspected</b>	<b>Location 1</b>	<b>Location 2</b>	<b>Location 3</b>
Circum littoral Muds with Sea Pens	SS.SMu.CFiMu.SpMnMeg	Y	-	NG5839516552	-	-
Maerl Beds ( <i>Phymatolithon calcareum</i> ) Live maerl	SS.SMp.Mrl	Y	-	NG6184514342	NG6204514132	-
Maerl Beds ( <i>Phymatolithon calcareum</i> ) Dead maerl on shore	-	Y	-	NG5543416842	-	-
Sea Grass Beds ( <i>Zostera marina</i> ) Live sea grass	LS.LMp.LSgr	Y	-	NG6184514342	NG6204514132	Reported: head of Loch Slapin
Sea Grass Beds ( <i>Zostera marina</i> ) Sea grass leaves washed up	-	Y	-	NG5760519752	-	-
Intertidal Under-Boulder Communities ( <i>Fucus serratus</i> zone)	LR.MLR.BF.Fser.Bo	Y	-	NG5809009612	NG6073512952	NG6205513962
Intertidal Under-Boulder Communities ( <i>Laminaria digitata</i> zone)	IR.MIR.KR.Ldig.Bo	Y	-	NG5809009612	NG6073512952	NG6205513962
File Shell Reefs ( <i>Limaria hians</i> )	SS.SMX.IMX.Lim	-	Y	-	-	-
Horse Mussel Reefs ( <i>Modiolus modiolus</i> )	SS.SBR.SMus.ModT/Mx/HAs/Cvar	-	Y	-	-	-
<b>Other Habitats</b>	-	-	-	-	-	-
Species-Rich Rocky Reefs from lower shore to sublittoral zone.	-	Y	-	NG5848515862	NG5940515502	-
<b>Species Name (seashore surveys)</b>	<b>Highland Status (ACFORN)</b>	<b>New Record</b>		<b>Location 1</b>	<b>Location 2</b>	<b>Location 3</b>
<i>Presence/Absence Reference: National Biodiversity Database (NBN) distribution maps.</i>				<i>not given if common</i>		
Maerl <i>Phymatolithon calcareum</i>	R	Y		NG6184514342	NG6204514132	-
Seagrass (Eelgrass) <i>Zostera marina</i>	R	Y		NG6184514342	NG6204514132	-
Long-legged Spider Crab <i>Macropodia rostrata</i>	F	Y		NG6205513962	NG6073512952	-
Broad-clawed Porcelain Crab <i>Porcellana platycheles</i>	O	Y		NG6205513962	NG6073512952	-
Long-clawed Porcelain Crab <i>Porcellana longicornis</i>	O	Y		NG6073512952	-	-
Shore Crab <i>Carcinus maenas</i>	A	N		Ubiquitous	-	-
Edible Crab <i>Cancer pagurus</i>	A	N		Ubiquitous	-	-
Hairy Crab <i>Pilumnus hirtellus</i>	R	Y		NG6205513962	NG5963511722	-
Montagu's Crab <i>Lophozozymus incisus</i>	R	Y		NG6205513962	NG6073512952	NG5942511542
Montagu's Crab <i>Lophozozymus incisus</i> (mottled form)	R	Y		NG6205513962	-	-
Risso's Crab <i>Xantho pilipes</i>	R	Y		NG6205513962	NG5942511542	-
Velvet Swimming Crab <i>Necora puber</i>	F	N		NG6205513962	NG6184514342	-
Harbour Swimming Crab <i>Liocarcinus depurator</i>	F	N		NG6184514342	-	-
Marbled Swimming Crab <i>Liocarcinus marmoreus</i>	R	suspected		-	-	-
Wrinkled Swimming Crab <i>Liocarcinus corrugatus</i>	R	Y		NG6178514372	-	-
Plumose anemone <i>Metridium senile</i>	F	Y		NG5759509552	-	-
Daisy anemone <i>Cereus pedunculatus</i>	R	Y		NG6178514372	-	-
Sea Potato <i>Echinocardium cordatum</i>	F	Y		NG5841508822	-	-
Purple Heart Urchin <i>Spatangus purpureus</i>	R	Y		NG6192514402	-	-
Peanut Worm <i>Golfingia vulgaris</i>	R	Y		NG6205513962	NG5810509612	-
Unidentified Sipunculid	?	?		NG5959511632	-	-
Thick Trough Shell <i>Spisula solida</i>	R	Y		NG6203514122	-	-
Sword Razor Clam <i>Ensis ensis</i>	O	Y		NG6203514122	-	-
Pullet Carpet Shell <i>Venerupis senegalensis</i>	F	Y		NG6203514122	-	-
Large Sunset Shell <i>Gari depressa</i>	R	Y		NG6203514122	-	-
Native oyster <i>Ostrea edulis</i>	O	Y		NG5942511542	NG6474115672	-
Variegated scallop <i>Chlamys varia</i>	O	Y		NG6474115672	-	-
Blue-rayed Limpet <i>Helcion pellucidum</i>	C	Y		NG6178514372	-	-
Pink Plates <i>Mesophyllum lichenoides</i>	R	Y		NG6205513962	NG5810509612	-
Butterfish <i>Pholis gunellus</i>	A	Y		Ubiquitous	-	-
Rock Goby <i>Gobius paganellus</i>	N (until this record)	Y		NG6073512952	-	-
	<b>Total New Records</b>	<b>25</b>				
<i>N.B. There are, of course, many other species to be found on these shores, not included in this list of mostly unusual and rare species.</i>						
Sites visited include shores at Tarskavaig Bay, Ob Gausgavaig (Tokavaig), shore west of Ord, shores north-east of Ord and 'Coral Beaches' adjacent to Rubha Dubh Aird, Heaste Island and reefs off Rubha Suinish.						

**From:** ALAN JOHNSON [<mailto:alan.johnson55@btinternet.com>]  
**Sent:** 10 November 2013 14:21  
**To:** [j.merryweather369@btinternet.com](mailto:j.merryweather369@btinternet.com); [info@wrft.org.uk](mailto:info@wrft.org.uk)  
**Subject:** Google Earth Image

Having read the list, here are a few more things on it, in case that is of any help,

Best wishes,

Alan

Google Earth streams the world over wired and wireless networks enabling users to virtually go anywhere on the planet and see places in photographic detail. This is not like any map you have ever seen. This is a 3D model of the real world, based on real satellite images combined with maps, guides to restaurants, hotels, entertainment, businesses and more. You can zoom from space to street level instantly and then pan or jump from place to place, city to city, even country to country.

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