



13th November 2013

The Wildlife Trusts response to Planning Scotland's Seas: 2013- Possible Nature Conservation Marine Protected Areas Consultation

There are 47 individual Wildlife Trusts across the UK including 37 Wildlife Trusts in England, six in Wales, the Scottish Wildlife Trust and Ulster Wildlife. Collectively, we have more than 800,000 members and our shared vision is to create A Living Landscape and secure Living Seas.

The Wildlife Trusts welcome the opportunity to respond to this consultation.

The Wildlife Trusts support the establishment of a UK wide, ecologically coherent and representative network of Marine Protected Areas (MPAs). We see the establishment of this network as at the heart of recovery of the UK's seas, critical to achieving our vision of Living Seas, where wildlife thrives, from the depths of the ocean to the coastal shallows. We strongly support the development of a network of Nature Conservation Marine Protected Areas in Scotland's seas- vital to the recovery and protection of Scotland's seas and to the coherence of the UK-wide network. We welcome the Scottish Government's commitment to achieving a well-managed network by 2016 and recognise the progress that these possible MPAs will make to achieving this aim. We also support the Scottish Government's commitment to a science-based approach to selection, designation and management of the MPA network.

Designation

In accordance with JNCC and Scottish Natural Heritage advice, we support the designation of at least 29 of the possible Nature Conservation MPAs in order to ensure that the network is as robust and resilient as possible and that future coherence can be achieved. We support the view that the designation of the Firth of Forth Banks Complex possible Nature Conservation MPA is essential to the coherence of the network. JNCC themselves have concluded that the *science based alternatives* proposed do not make equivalent contributions to the network to those made by the Firth of Forth Banks Complex. We therefore consider it essential that the Firth of Forth Banks Complex is designated as a Nature Conservation MPA.

Management

For the future network of Marine Protected Areas to be truly effective, and meet commitments under OSPAR and MSFD, appropriate management measures should be established for the entire network. This should include the management of existing European Marine Sites (EMS), many of which still lack appropriate management measures, in particular the management of damaging fishing activities. The UK Government, through Defra, the MMO and Inshore Fisheries and Conservation Authorities and in consultation with a wide range of stakeholders, are implementing an ambitious programme of reform to management of fishing activities within EMS to protect them from damaging activities and to ensure compliance with Article 6 of the Habitats Directive.

We would urge the Scottish Government to take similar action to ensure proper management of EMS within Scotland's waters.

Non-damaging or degrading activities should be allowed within MPAs and truly sustainable use of Scotland's seas should be encouraged. However, we are concerned that conservation objectives and management options presented will not allow recovery of sites and fully protect features and ecosystem function of the sites from damage and degradation. Considering that Scotland's Marine Atlas highlighted many areas of concern and deterioration in Scotland's seas, it is concerning that the conservation objectives of only a few individual features are set to recover. It would be more appropriate for a more precautionary approach to be taken, in particular where the condition of the feature is unknown. The population status of the species as a whole should also be considered when setting conservation objectives as opposed to consideration of the status of the feature solely within the proposed site.

Impact Assessments

We are concerned that the socio-economic data used to inform impacts of the designation of individual sites and the network as a whole focuses almost entirely on the impacts of designation and management on industries such as fisheries, oil and gas (indeed without management measures of individual sites being made entirely clear). The benefits of designation of these sites using an ecosystem goods and services approach, which also takes into account social benefits, would result in a more balanced impact assessment. Consideration should also be made of the risks and costs of a failure to designate.

Future

Although we recognise the considerable progress that designation of at least 29 of the possible Nature Conservation MPAs will make to the creation of an ecologically coherent network, further work is needed to ensure a truly coherent network is established. A further four MPA search locations still need assessment- and we urge that these are progressed as soon as possible. There is still a need to identify and locate MPAs for a further three MPA Search Features. Furthermore, we are concerned that the MPA and Priority Marine Feature assignment processes have failed to address the protection needs of migratory and highly mobile species including seabirds and cetaceans. Progress needs to be made in identifying sites to protect these species, including at-sea foraging areas for seabirds, before the network can be considered complete.

The Wildlife Trusts are also in support of the detailed comments submitted by Scottish Environment LINK in response to the specific consultation questions.