

Forth Ports PLC

Re: Marine Scotland Consultation on Sea Haul-out Site Designations

Forth Ports PLC welcomes the opportunity to comment on this consultation. We have some general comments alongside answers to some of the questions posed in the consultation document.

General Comments

It is not clear what protection these designated sites actually afford to the seals or what actions need to be taken by affected parties (or indeed who would be affected). What constitutes harassment for example?

Reference is made to the existing 14 SACs designated for seals. What is the relationship between the designated haul out sites (outwith the SACs) and the sites within the SACs? Are specific sites within the SACs to be designated or is there now a blanket designation across all of the SAC intertidal areas? The latter is clearly unacceptable as it will apply to areas where it is known that seals do not haul out and will represent a further barrier to activities that would otherwise be perfectly legitimate had such a designation not been applied.

Answers to Specific Questions

Question 1: Do you consider that the overall number of seal haul out sites proposed at national/regional/local level represent a reasonable balance between seal conservation and other sustainable activities around the Scottish coastline?

There appear to be a significant number of individual sites. It is unclear how these will be marked to allow beach users (or any other stakeholder) to identify these sites.

Question 4: Do you agree that existing Special Areas of Conservation for seals should be added to the list of seal haul out sites being considered for possible designation?

As noted above, blanket designation of all intertidal areas within SAC areas is not an appropriate approach, as many of these SACs are designated for multiple interests. There are intertidal areas where seals do not haul out within existing SACs, and the presumption that the sites are haul out sites could stifle other legitimate uses.

We trust our comments are useful and are happy to provide further information if clarification is required.

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