

## CONSULTATION QUESTIONS

### General 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?

No, we consider the number of sites proposed is excessive.

Question 2: Do you consider that additional sites should be included at national/regional/local level and, if so, why, how many additional sites and which sites?

No, we do not consider additional sites necessary, particularly given the large increase in the grey seal population over the last 10 years.

Question 3: Do you consider that fewer sites should be included at national/regional/local level and, if so, why, how many fewer sites and which sites?

Yes, we believe fewer sites should be designated at a National level. Current SACs that are in place offer protection at specific locations important for the two seal species found in Scotland. Designating a further 146 seal haul out sites brings into question the reasons for the designations and how they relate to the protected areas already in place under current legislation (Habitats directive).

The grey seal population in particular has increased massively over the last 10 years. Seals prey on wild fish such as juvenile white fish, sea trout and salmon. Designating 50% of the grey seal haul outs is not going to help protect wild salmon, a species also designated as requiring protection under legislation.

Little is understood about the true interactions between the grey and common seals. Seals in general range far and wide in pursuit of fish and there is a view that the growth in the grey seal population has impacted negatively on common seals at least in some areas.

Seals are known to prey on farmed salmon. Designated haul out sites near to salmon farms (which have existed for many years and often pre-dating seal haul out sites), may negatively impact the welfare of farmed salmon. Farmers have a legal responsibility to protect the welfare of their stock.

We would question the need to designate multiple sites in a small area, such as around Ulva (Mull) where the proposal is to designate 5 haul out sites (010, 012, 017, 018, 023). A similar situation arises in Orkney where there are SACs for each species, but 32 sites proposed as designated haul out 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?

The existing network of SACs should be the starting point for any designation of seal haul out locations. The sites have been recognised, designated and protected due to their importance for common and grey seals and have been studied extensively. The SACs should not be used 'in addition' to, but as a fundamental part of this haul out designation.

Question 5: Do you consider that particular national or regional level activities might represent a potential risk of harassment to seals on haul out sites in general?

There are many different activities which may be perceived as a potential risk of harassment of seals at their haul out sites. These include: inshore leisure activities, tourism and fishing. The level of harassment would depend on the proximity and intensity of the activity and whether it is carried out routinely or occasionally. However it would be difficult to quantify harassment in each location and rank the impact of activities accordingly.

Question 6: Do you consider that particular local activities might represent a potential risk of harassment to seals on particular haul out sites included on the list?

Question 7: Do you have any views on whether the boundaries of particular haul out sites included on the list might be revised?

No

### Equality assessment

The Scottish Government must ensure that any policies that it implements do not unduly discriminate against persons defined by age, gender, disability, sexual orientation, race and religion and belief. We would welcome your views on whether you believe that any of the propositions set out in this consultation paper will unduly impact on any of these groups mentioned.

No