

Seal Haul-Out Consultation
Scottish Government
Marine Planning and Policy
Area 1-A South
Victoria Quay
Edinburgh
EH6 6QQ

14/6/11

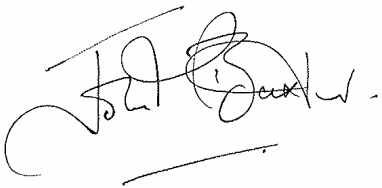
Dear Sir

Thank you for consulting SNH on the proposed seal haul out sites to be designated under the marine (Scotland) Act 2010.

We consider that the process that has been undertaken is a fair and reasonable one that has resulted in the identification of a set of sites, based on the best available information, that represent a good balance between delivering the necessary level of seal conservation whilst enabling other legitimate activities to continue to be practised in the Scottish marine environment.

I attach a copy of the Respondent Information Form as requested and trust you find our comments helpful. If you require any further clarification on any points please do not hesitate to contact me.

Yours sincerely



Dr John M Baxter

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?

We believe the method devised by the Sea Mammal Research Unit to identify the haul-outs to be appropriate and robust. Furthermore we consider that the haul-out sites proposed at the national, regional and local levels represent a reasonable balance between delivering seal conservation and enabling other activities in the Scottish marine environment.

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, not at this time.

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?

No.

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?

Yes.

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?

In our view the following activities have the potential to harass or disturb seals if carried out without consideration or mitigation:

- Seismic surveys;
- Cable or pipeline laying;
- Installation and operation of marine renewables devices;
- Filming or photography of seals;
- Seaweed harvesting;
- MOD exercises;
- Disembarkation of large numbers of passengers in remote locations e.g. from cruise ships;
- Water-borne recreation such as jet skiing.
- Aquaculture activities
- Fisheries activities
- Coastal developments
- Seal watching trips

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?

- Large numbers of visitors arriving at a haul-out together on foot particularly during the sensitive breeding and moulting periods.
- Large numbers of sea kayakers passing close by a haul-out.
- Water borne recreation such as jet skiing .

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

We consider the current boundaries to be appropriate.

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.

We do not believe that any of the propositions set out in this consultation paper will unduly discriminate against persons defined by age, gender, disability, sexual orientation, race, religion or belief.