



MPA Network Consultation,
Scottish Government,
Marine Planning and Policy Division,
Area 1-A South,
Victoria Quay
Edinburgh,
EH6 6QQ

20 December 2013

Dear Sir/Madam,

Marine Protected Areas in Scotland

I am delighted that the Government has proposed the introduction of 33 MPA's around Scottish shores with all of the advantages that these will bring. However I would like to point out that my particular interest is in the preservation and improvement in the conditions available to our hard-pressed seabird population and it would appear that these have been almost entirely omitted. Specifically I would make the following observations

Q1.

MPA's are needed not only to protect marine wildlife but also seabirds. It has been scientifically proven that MPA's can and will benefit seabirds and this opportunity must be seized. In addition the Government is legally obliged to create an "ecologically coherent" network of MPA's, clearly in order for this network to be described as such it must include the seabird population and this will require the inclusion of protected areas for seabird feeding 'hotspots'.

Q2; Q3; Q6; Q13; Q19; Q21

All of the above indicated sites must be designated to protect black guillemot. Additionally, other seabird species must be protected in these sites and should be added to the list of designated features.

Q28; Q29.

The proposed Firth of Forth Banks Complex MPA must be designated, as recommended by the Joint Nature Conservancy Council and SNH. It is also important that sandeels should be

protected in this MPA as these are an important food source for seabirds and will have a critical ecological function on which many other marine wildlife are dependent. In addition seabirds must be added to the list of designated features and be protected in this site.

Q35.

The Scottish Government has committed to an international agreement to create an 'ecologically coherent' network which is 'representative' of nationally important species and "particularly important for highly mobile species, such as certain birds".

Unless protection for seabirds is included this network cannot be considered complete. The drastic declines seen in the numbers of our seabirds over recent years can only be stemmed by their inclusion within the protection offered by MPA'S and Special Protection Areas.

The Scottish Government have argued that seabirds are already adequately protected but this is not the case. We have seen great declines in many seabird populations over the past ten years and it has been predicted that we could see seabirds go extinct from some parts of our coastline within the next ten years. We need MPA'S that protect areas of national importance for our own iconic seabirds, not just areas of European importance, which is currently the case.

Please note that this is an individual response to the Planning Scotland's Seas MPA consultation.

Yours faithfully

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