



MPA Network Consultation
Scottish Government
Marine Planning & Policy Division
Area 1-A South
Victoria Quay
Edinburgh
EH66 6QQ

Dear Sirs

Marine Protected Areas for Scottish specialities and the decline of Scotland's seabird colonies

This is an individual response to the "Planning Scotland's Seas MPA Consultation".

We are writing to express our dismay that the Scottish Government still proposes to exclude the protection of seabirds from the criteria for establishing MPAs.

We live in Orkney, where the wonderful diversity of birdlife is a continuing delight, but we are witnessing a terrible decline in the numbers of some species around our shores. The reasons for this are doubtless highly complex, as most ecological issues usually are, but it seems to us grotesque in the extreme that the Scottish Government – our government, in our land – could reject such an opportunity to help stem the approach to local extinction of some of our bird populations. We are well aware that national administrators are obliged to balance many competing interests when enacting legislation, but we cannot imagine that any enlightened Western government in the twenty-first century would wish to be seen internationally as complicit in the obliteration of its natural heritage.

Turning now to some specific questions:

Q1. Do you support the development of an MPA network in Scotland's seas?

Yes, unequivocally, for the benefit of all marine ecological systems and organisms. The Scottish Government is legally obliged to create an "ecologically coherent" network of MPAs, but the exclusion of the protection of seabirds is wholly inconsistent with this requirement.

**Q2 Clyde Sea Sill; Q3 East Caithness Cliffs; Q6 Fetlar – Haroldswick;
Q13 Monach Isles; Q19 Papa Westray; Q21 Small Isles**

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

Q28 & Q29 Firth of Forth proposed MPA

The proposed Firth of Forth Banks Complex MPA must be designated, as recommended by the Joint Nature Conservancy Council and Scottish Natural Heritage. Sandeels in this area are a vital food source for seabirds and other creatures, and should be protected. Seabirds must be added to the list of designated features and protected in this site.

Q35 Is the proposed network complete?

Without protection for seabirds the network cannot be considered complete. We have noted above the absurdity of claiming that an MPA network could make any claims to ecological coherence when seabird protection is excluded. MPAs are required to complement Special Protection Areas and, via an inclusive ecological approach, offer seabirds the level of protection required now to help arrest the desperately sad decline in their numbers over recent years.

Yours faithfully

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