

8 November 2013.

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

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

Dear Sirs

While I am in general agreement with the proposals contained in the MPAs, I am concerned that seabirds have not been specifically included in them as Scotland's seabird colonies are declining at an alarming rate.

I would comment on the relevant questions as follows:-

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

MPAs are needed to protect Scotland's amazing marine wildlife, including seabirds. Reports from the British Trust for Ornithology and other independent scientists show the MPAs can and should benefit seabirds. The Scottish Government is legally required to create an "ecologically coherent" network of MPAs, but the network is not coherent unless protected areas for seabird feeding "hotspots" are included.

Q22 Clyde Sea Sill; Q3 East Caithness Cliffs; Q6 Fetlar--Haroldswick; Q13 Monach Isles; Q19 Papa Westray; Q21 Small Isles

All the sites listed above should be designated to protect black guillemot. Additionally, 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. It is also important that sandeels should be protected in the Firth of Forth MPA. Sandeels in this area are an important food source for seabirds and have a critical ecological function on which many other marine animals are dependent. Living in the Firth of Forth area, I am very concerned at the fall in the number of gannets and other seabirds which make this area their home. For years they have been part of the marine environment and it is essential that they are added to the list of designated features and be protected in this site.

Q35 Is the proposed network complete?

Without protection for seabirds the network cannot be considered complete. 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." MPAs are required to complement Special Protection Areas and offer seabirds the level of protection required to help stem the drastic and continued declines in their numbers over the last twenty years.

Yours faithfully