



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

4 November 2013

Dear Sir or Madam,

I am writing in response to the Scottish Government consultation on Possible Nature Conservation Marine Protected Areas. You may guess from my name that I come from a Scottish family, though I now live in England. I do however return several times a year to Scotland to fish for sea-trout and salmon, primarily on the Annan.

How eagerly I looked at your map in the hope of seeing that the sea-life of the Solway would receive much-needed protection and how disappointed I was that there is nothing - nothing whatsoever.

This estuary and indeed the Irish Sea as a whole, has fish stocks that are indisputably a small fraction of what they once were and the major cause of that has been and remains egregious overfishing by commercial fishing boats. Specifically the rivers of this area once had much higher numbers of sea trout and salmon as well as of other anadromous species that are even more threatened, but which still hang on in the Solway, such as sparring, allis shad, twaite shad, and brook, river and sea lampreys. One of the threats to all these species is being caught deliberately or as by-catch in commercial fishing operations and the degradation of their marine and river habitats.

A significant sized fully protected (no take) marine reserve is more than justified in the Solway to help rebuild populations of these threatened species as well as other species, and to allow natural ecosystems to restore themselves in at least a proportion of the estuary. Fully protected marine reserves are proven to benefit biodiversity and are best practice as part of a comprehensive biodiversity conservation plan (see Partnership for Interdisciplinary Studies of Coastal oceans). Whilst a significant sized fully protected marine reserve would certainly only be part of the solution and other conservation measures are required as well, the failure in your plan to provide any protected area in the Solway (not even a semi-protected area) shows callous indifference to the plight of these threatened species and marine and coastal biodiversity in general.



It is also ironic perhaps that the Anna river Board has recently suggested a no take policy be adopted for sea trout fishing on this river. Are you going to argue that a no-take marine reserve would not benefit biodiversity in the Solway, whereas a no-take policy on the river Annan would? In fact I would argue you probably need both and other measures too for the conservation of these fish and of other species too. However specifically in terms of this consultation, I find the lack of any fully protected area in the Solway means that the proposal you are consulting on is wholly inadequate at least as far as this area of Scotland is concerned.

Yours faithfully,

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Alistair Gammell

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