

MPA CONSULTATION QUESTIONS

1. Do you support the development of an MPA network in Scotland's Seas?

Yes

We welcome the designation of a NC MPA network in Scotland as an important step towards the improved protection of marine habitats and species of importance to wild salmon and sea trout fisheries.

Even after MPA network designation, there will still be much to do to recover more than a small proportion of the MPA search features and priority species that have been lost since the 'three mile limit' was removed in the mid 1980s.

Individual possible Nature Conservation MPAs

2. Do you have any comments on the case for designation, management options and socioeconomic assessment for the possible Nature Conservation MPA(s)?

INSERT RELEVANT pMPA NAME(S) HERE Northwest Sea Lochs and Summer Isles

Designation:

Yes

We strongly support this designation for protecting and restoring a diversity of seabed habitats and species.

We believe that improved protection particularly of shallow water seabed habitats within the Loch Ewe, Gruinard Bay, Little Loch Broom and Loch Broom area will help wild salmon and sea trout and many other fish species.

Some of the habitats to be given greater protection are of importance to the small fish upon which sea trout feed; including herring, a 'keystone' species for the area. Herring formerly spawned on maerl beds within and just outside the proposed MPA boundary.

Therefore the MPA should be extended to ensure that all maerl beds and other seabed habitats used as fish spawning grounds around Wester Ross are protected as they were until 1985 (see below).

Sea grass beds within the possible MPA (e.g. in Loch Ewe and Gruinard Bay) should not be omitted from the list of features to be protected and recovered.

Management Options:

Yes

We support the proposed involvement of local people and stakeholder groups with site management. WRFT would seek to actively participate.

For sea trout, the shallow water habitats including maerl beds, seaweed communities on sub-littoral sediment, and sea grass beds are of particular importance as they represent habitats considered to be important for feeding. Many of these habits have been damaged particularly by dredging for scallops since 1985.

Therefore, we believe that towed and active fishing gears should be excluded from all shallow areas, especially in areas where alternative less-damaging harvesting methods including creeling and scallop diving can provide comparable or higher

economic return per unit seabed area.

Operation of any towed and active fishing gear within the possible MPA should be subject to Environment Impact Assessment.

We support the recommended management options for finfish aquaculture. As discharges from salmon farms can damage maerl beds beyond the Allowable Zone of Effect, we therefore would seek that fin-fish aquaculture discharges are monitored and regulated to protect maerl beds and other sensitive habitats within the proposed MPA area.

Socioeconomic Assessment:

Yes

Fisheries for sea trout and salmon are a part of an important wildlife tourism industry in Wester Ross which also includes marine wildlife watching (including snorkelling and diving) and sea angling. Successful development of the MPA should benefit all of the above.

We recognise that the commercial inshore fisheries of the area are also of socio-economic importance for the local area. There is much potential for the restoration of fish and shellfish populations associated with the recovery of seabed habitats within the area.

We believe that the successful development of the MPA will benefit the majority of local fishing business by helping to promote harvesting methods and management that can secure the long-term sustainability of fisheries resources of the area.

All of the above:

Yes

The possible Northwest Sealochs and Summer Isles MPA could be called the **'Wester Ross' Marine Protected Area**, to provide clearer local identity and foster local interest and a greater sense of local ownership; this may help to foster active local support for developing and managing the area to maximum benefit.

Further surveys should be carried out to record the occurrence and condition of MPA search features within the MPA area and neighbouring areas.

Surveys should be carried out to learn more about the occurrence and utilisation of seabed habitats in the area by fish species, particularly those which may spawn within the possible MPA (e.g. skate and herring).

Sustainability Appraisal

3. Do you have any comments on the Sustainability Appraisal of the MPA network as a whole?

Yes

For the MPA network to be most effective, it is necessary to develop site-specific community-based opportunities for participation in natural resource management. For the network to succeed it must be clearly relevant to the lives and livelihoods of the Scottish people particularly those who will be most directly affected by it.

Final Thoughts

4. On the basis of your preferences on which pMPAs should be designated, do you view this to form a complete or ecologically coherent network, subject to the completion and recommendations of SNH's further work on the 4 remaining search locations?

No

To achieve ecological coherence, the Scottish Government needs to consider the role of finfish and shellfish species, traditionally regarded as only of importance to commercial fisheries (under Marine Scotland's remit) within marine ecosystems.

Fish species which can be of 'keystone' importance within 'natural' inshore marine ecosystems around Scotland include **herring** which spawn on the seabed (and which can be an important food for salmon and sea trout), sea trout, salmon and juvenile gadids. None of these were included on the list of MPA search features. Therefore, we do not believe that a 'natural' ecosystem approach has been followed.

Our forbearers established a 3-mile 'marine protected area' in the 19th Century to protect habitats for spawning herring and other economically important fish populations within inshore waters. The collapse of many coastal fish populations since 1985 lends support to their earlier more precautionary approach to fisheries management and marine protection.

The proposed 21st century MPA network provides a level of marine protection much less than that which was afforded by the 3-mile limit to mobile fishing gear. Following the removal of the 3 mile limit in 1985, seabed habitats around Scotland have been subject to much damage and destruction; and many wild fish populations and coastal fisheries (e.g. for whitefish, herring, sea trout) have collapsed.

There is much to do to better protect and manage our inshore marine environment in order to restore healthier fish populations and sustain more prosperous coastal communities around Scotland; the current network remains inadequate unless other measures can be put in place to provide better protection for fragile marine habitats and priority species outwith possible MPAs that remain threatened.

5. Do you have any other comments on the case for designation, management options, environmental or socioeconomic assessments of the pMPAs, or the network as a whole?

Yes

Objectives for nature conservation need to be better meshed together with objectives for fisheries management.

The value of protecting seabed habitats for fisheries management purposes needs to be better understood.

However, the proposed MPA network represents progress. We recognise that a huge amount of work has been carried out by SNH staff and colleagues within the Scottish Government in progressing the Scottish MPA project thus far. Well done to all.

Thank You.