

CONSULTATION QUESTIONS

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

Yes ✓ No

Comments

Individual possible Nature Conservation MPAs

2. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Clyde Sea Sill* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes ✓ No

Comments

3. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East Caithness Cliffs* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

4. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *East of Gannet and Montrose Fields* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

5. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Faroe-Shetland sponge belt* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

6. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Fetlar to Haroldswick* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

7. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Hatton-Rockall Basin* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

8. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Creran* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

9. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

10. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sunart to the Sound of Jura* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

11. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Loch Sween* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

12. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Lochs Duich, Long and Aish* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

13. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Monach Isles* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

14. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Mousa to Boddam* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

15. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-east Faroe Shetland Channel* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

16. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west Orkney* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

17. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *North-west sea lochs and Summer Isles* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

18. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Noss Head* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

19. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Papa Westray* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

20. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Rosemary Bank Seamount* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

21. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Small Isles* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

22. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *South Arran* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

23. Do you have any comments on the case for designation, management options and socioeconomic assessment for *The Barra Fan and Hebrides Terrace Seamount* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

24. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Turbot Bank* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

25. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Upper Loch Fyne and Loch Goil* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

26. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *West Shetland Shelf (formerly Windsock)* possible Nature Conservation MPA?

Designation: Yes No

Comments

Management Options: Yes No

Comments

Socioeconomic Assessment: Yes No

Comments

All of the above: Yes No

Comments

27. Do you have any comments on the case for designation, management options and socioeconomic assessment for the *Wyre and Rousay Sounds* possible Nature Conservation MPA?

Designation:

Yes No

Comments

Management Options:

Yes No

Comments

Socioeconomic Assessment:

Yes No

Comments

All of the above:

Yes No

Comments

Choices to represent features in the MPA Network

28. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea, do you have a preference or comments on the following combinations to represent these features, bearing in mind Turbot Bank will need to be designated to represent sandeel in this region:

- Firth of Forth Banks Complex
- Turbot bank and Norwegian Boundary Sedimentary Plain
- Or Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain

Comments

29. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the Southern North Sea?

Yes No

Comments

30. Recognising the scientific advice from JNCC included alternatives for representing the burrowed mud feature in the Fladens, do you have a preference or comments on the following combinations to represent these features, bearing in mind the part of Central Fladen (known as Central Fladen (Core)) containing tall seapen (*Funiculina quadrangularis*) will need to be designated to represent tall seapen in this region:

- Central Fladen pMPA only
- The tall sea-pen component of Central Fladen, plus Western Fladen
- Or the tall sea-pen component of Central Fladen, plus South-East Fladen.

Comments

31. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing the burrowed mud feature in the Fladens?

Yes No

Comments

32. Recognising the scientific advice from JNCC included alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V, do you have a preference or comments on the following combinations to represent these features:

South-West Sula Sgeir and Hebridean slope
Or Geikie slide and Hebridean slope

Comments

33. Do you have any comments on the case for designation, management options and socioeconomic assessments for the preference you have indicated in the question above, regarding alternatives for representing offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V?

Yes No

Comments

Sustainability Appraisal

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

Yes No

Final Thoughts

35. 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?

Yes ✓ No

The Sustainable Inshore Fisheries Trust (SIFT) wishes to make further comment on the inshore pMPAs and the proposed Network as follows:

The National MPA Network

In general terms SIFT supports the designation of a National Marine Protected Area Network within Scottish waters. In particular, SIFT urges the Scottish Government to fully commit to a science-based approach to monitoring and management of the network with a particular emphasis on ecosystems-based management strategies. SIFT believes the current management options are insufficient to achieve adequate protection of the Priority Marine Features they are designed to protect. SIFT also believes that the management options' failure to adopt an ecosystem based approach will ensure that they fail to materially assist the protection of sensitive marine features. SIFT also believes that the management options are also likely to have a impacts on other marine sectors – and these have not been taken into account. However SIFT's overarching view remains that the management options need to be stricter to ensure a coherent network is developed that will lead to a richer and more diverse ecosystem.

SIFT is concerned that of the 33 pMPAs only three have conservation objectives set to recover (with the remainder set to conserve). SIFT considers this lack of

intention to enhance outcomes to be a missed opportunity for both conservation objectives and socio-economic improvement of Scotland's seas. Scottish Government must be cognisant of its duty under OSPAR convention and the Marine Strategy Framework Directive to create a coherent network which is fully integrated into marine planning over the coming years and SIFT is not convinced that the current conservation objectives and management proposals will allow Scottish Government to meet its international obligations.

The proposed Clyde-based MPAs

General Comments

SIFT strongly supports the designation of all three of the Clyde-based pMPAs. Given the acknowledged degradation of the Clyde fisheries and marine habitat (Clyde Ecosystem Review, Marine Scotland) SIFT believes, these 3 designations can help address these problems – as long as appropriate management measures are implemented. Notwithstanding our comments below, it is hoped the designations of all 3 Clyde pMPAs would also help deliver the commitment of Scottish Government to the Clyde 2020 initiative.

The three Clyde-based pMPAs have all been set conservation objectives to 'conserve' rather than 'recover'. SIFT believes this to be an inadequate approach to management in areas where unequivocal scientific advice has indicated material declines in species richness - particularly to commercial fish species populations and biomass. SIFT is also concerned about the resultant socio-economic losses where sustainable operations may be curbed or altered, particularly due to indirect effects of fishing activity displacement. Furthermore SIFT believes there are crucial gaps in the socio-economic analysis and that designation and management can only be robustly designed after a holistic analysis of such impacts has been undertaken. For example, no analysis of potential socio-economic costs has been provided for each pMPA where designation does NOT occur: in other words the economic impacts (likely to be deleterious) need to be assessed if strict management is not implemented and further degradation of the marine environment ensues.

Clyde pMPA Management Options

SIFT strongly disagrees with the suggested management options for all fishing activity within the three Clyde-based pMPAs. SIFT strongly believes that the proposed fisheries management measures should be based on a more holistic basis than that suggested within the management options (for example the piece-meal approach suggested with regard to dredging and trawling).

In general, SIFT does not believe each fishing activity can be considered on a case-by-case basis; management of fishing activities must be considered with regard to their cumulative impacts on any geographical area not on an individual basis.

The Sustainability Appraisal

The Sustainability Appraisal has not adequately quantified the potential benefits to any users other than the mobile sector of the fishing industry. SIFT would expect the designation process to include a full ecosystem goods and services analysis with regard to assessing the socio-economic benefits.

The potential effects of displacement of fishing activity have not been robustly considered within the Sustainability Appraisal and Strategic Environmental Assessment. Traditionally, displacement results in increased fishing pressure outwith the areas of designation. Where this occurs the resultant impacts are both environmental and economic and these potential impacts have not been fully developed within the assessments. Perhaps more fundamentally, where fishing pressures are moved within an MPA (or indeed where exclusion of one form of fishing pressure allows a significant increase in a different fishing pressure), no explanation of how management measures would be implemented has been provided.

The differences in analyses methodology (for example the differing assumptions surrounding the displacement of activities) between the Sustainability Appraisal and Strategic Environmental Assessment does not provide a consistent knowledge base to fully inform the decision-making process.

Inshore Fisheries Management Implications

It is noted that Marine Scotland will lead on the implementation of those management options which impact fishing activities. In order to do so effectively,

SIFT expects Marine Scotland to fully consult with all sectors of the fishing industry on a detailed site-by-site basis. SIFT would also expect all stakeholders to be actively encouraged by Marine Scotland to engage in such consultations. Clearly, better fisheries data (both stock assessment and fishing activity) should be obtained in order to inform these consultations. Indirect impacts on the fishing industry (such as where renewable sites may be situated outwith pMPAs and on traditional fishing grounds) should also be included within any analysis.

SIFT believes that the Inshore Fisheries Groups (IFGs) have the potential to be the best means of enabling effective engagement by the fishing industry with Marine Scotland. However to fulfil this role, SIFT expects the IFGs to be adequately supported by Marine Scotland, and to become representative of all stakeholders in the fishing industry including Recreational Sea Angling. This will allow pMPA management measures to be developed with the full engagement of all sectors of the fishing industry. Similarly were the IFGs fairly constituted, these bodies could be utilised to implement data gathering initiatives within their management plans.

36. 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 No

Comments