The Scottish Government
Riaghaltas na h-Alba

Marine Scotland

2014 Consultation on the management of inshore Special Areas of Conservation and Marine Protected Areas

Consultation Report

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2014 Consultation on the management of inshore Special Areas of Conservation and Marine Protected Areas

Consultation Report

The Scottish Government, Edinburgh 2015

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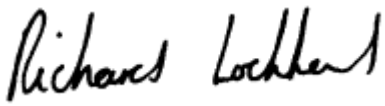
1. Ministerial Foreword

Less than a year on from designation of inshore Marine Protected Areas I am announcing the way forward with management measures for 11 of the sites. Alongside this, I am also announcing the way forward with management of 9 Special Areas of Conservation. This represents another milestone in the management of Scotland's Seas. The intended measures not only further the conservation objectives of the protected areas but also have the potential to improve the health of our seas.

There has been another excellent response to the consultation and I am grateful to everyone who responded. Also to the stakeholders who participated in the pre-consultation management forums. The key themes from the consultation that are reflected in the intended measures are;

- The need for measures to be as simple and understandable as possible.
- That the measures should be more ambitious.
- The measures should remain as proportionate as possible.

The work on completing and managing the MPA network does not end here. There will be a second management consultation beginning in early July 2015. In addition I anticipate a further public consultation on the case for designation of new Marine Protected Areas, Special Protection Areas, and Special Areas of Conservation later in the summer. I hope that you all continue to engage in the journey to a well-managed network by the end of 2016.



RICHARD LOCHHEAD

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Sunnyside Primary School for allowing the art work provided by pupils to be published in this report.

3. Executive Summary

3.1. Background overview

3.1.1. The consultation on the Management of Inshore Special Areas of Conservation (SACs) and Marine Protected Areas (MPAs) and associated documents set out proposals for new management measures for protected areas in Scottish Territorial Waters.

3.1.2. The consultation ran from 11th November 2014 until 2nd February 2015; respondents were invited to submit their opinions and views on the proposed statutory management measures, including those preferred by the Scottish Government, for a selection of inshore MPAs and SACs.

3.2. Overview of Respondents

3.2.1. The consultation attracted 4,974 responses. This included:

- 52 standard responses;
- 144 single area responses (where respondents commented mainly on one MPA or SAC);
- 4,758 submissions of a campaign text promoted by Scottish Environment LINK; and
- 20 submissions of a campaign from Sunnyside Ocean Defenders.

3.3. Overview of Analysis

3.3.1. The consultation posed a series of questions on proposed approaches to management in nine SACs and 11 MPAs.

3.3.2. The standard, and single area, consultation responses were examined and key themes, which are similar issues raised in a number of responses, were identified at each question. Sub-themes; including reasons for opinions, supporting arguments, alternative suggestions or other related comments; were also noted. The key themes were then examined to identify whether any particular theme was specific to any particular respondent group or groups; for example was the theme more prominent in responses from individuals or from any organisational sub-group.

3.3.3. The SE link campaign has been addressed through analysis of standard responses. The member organisations of SE link articulated the reasoning for the campaign text in their responses. Alternative text has also been identified.

3.3.4. The responses from the Sunnyside Ocean Defenders has provided a pictorial reminder of why our protected areas and our seas need to be well-managed.

3.4. Overview of Responses & Government Position

3.4.1. The following paragraphs outline the answers given to the set consultation questions and the subsequent government responses.

3.4.2. East Mingulay SAC

3.4.2.1. We asked if you supported management approaches 1 or 2 and if you agreed with the economic, social, and environmental assessments.

3.4.2.2. You said:

- Approach 1, prohibiting the use of any demersal fishing gear on a zonal basis along with a vessel capacity restriction, was supported by 11 respondents.
- Approach 2, prohibiting the use of demersal mobile gears throughout the SAC, and any demersal static fishing gear on a zonal basis, was supported by 18 respondents.
- Opinion was divided over the economic, social, and environmental assessments with slightly more respondents disagreeing.

3.4.2.3. We intend to implement a revised version of Approach 2.

3.4.3. Loch Creran MPA /SAC

3.4.3.1. We asked if you supported management approaches 1 or 2 and if you agreed with the economic, social, and environmental assessments.

3.4.3.2. You said:

- Approach 1, prohibiting the use of suction dredges (boat or diver operated) throughout the MPA /SAC along with a spatial measure prohibiting trawling in an area containing flame shell bed (in addition to the existing management measures), was supported by ten respondents.
- Approach 2, which would prohibit the use of trawls and suction dredges (boat or diver operated) throughout the MPA / SAC (in addition to the existing management measures) was supported by 15 respondents.
- Opinions were mixed regarding the economic, social, and environmental assessments.

3.4.3.3. We intend to implement measures based on approach 2 with adjustments to the creel fishing areas within the Loch.

3.4.4. Loch Laxford SAC

3.4.4.1. We asked if you supported the management approach and if you agreed with the economic, social, and environmental assessments.

3.4.4.2. You said:

- The management approach which would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the SAC was supported by 22 respondents.
- Opinion was divided over the economic, social, and environmental assessments with slightly more respondents agreeing.

3.4.4.3. We intend to implement measures as per the consultation.

3.4.5. Loch Sunart to Sound of Jura MPA (incorporating Loch Sunart MPA / SAC)

3.4.5.1. We asked if you supported management approaches 1 or 2 and if you agreed with the economic, social, and environmental assessments.

3.4.5.2. You said:

- Approach 1 would provide a site-wide prohibition of suction dredges (boat or diver operated), long lines, bottom set nets and trawl tickler chains. In addition mobile gear would be prohibited from the deep areas where mature common skate tend to reside. Three respondents supported this approach.
- Approach 2 built on Approach 1, adjoining three of the deep areas to include shallower waters and provide connective protection for transient common skate. This was supported by ten respondents.
- Most respondents disagreed with both approaches and with the economic, social, and environmental assessments of the impact of the management approaches.

3.4.5.3. We intend to implement more ambitious measures incorporating revised management of the Firth of Lorn SAC.

3.4.6. Loch Sween MPA

3.4.6.1. We asked if you supported management approaches 1 or 2 and if you agreed with the economic, social, and environmental assessments. We stated that further management consideration would be required for burrowed mud and sublittoral mud and mixed sediment communities under approach 1.

3.4.6.2. You said:

- Approach 1 would prohibit suction dredging (boat or diver operated) throughout the MPA and restrict mechanical dredge, demersal trawl, and hand gathering on a zonal basis. There was no support for this approach.
- Approach 2, had an increased level of zonal protection over the alternative that was also presented. The preferred approach also introduces a curfew on mechanical dredging in the outer part of the MPA to limit pressure on the habitats there. This was supported by ten respondents.
- 17 respondents said they did not support either approach.
- Opinion was divided over the economic, social, and environmental assessments with more disagreeing.

3.4.6.3. We intend to implement an enhanced version of approach 2.

3.4.7. Lochs Duich Long & Alsh MPA /SAC

3.4.7.1. We asked if you supported the management approach and if you agreed with the economic, social, and environmental assessments.

3.4.7.2. You said:

- The management approach presented would replace the licence condition that currently protects the reefs, in addition to the existing seasonal closure to mobile gear. More respondents (17) said they did not support this approach than said that they supported it (11).
- Opinion was again divided over the economic, social, and environmental assessments with more disagreeing.

3.4.7.3. We intend to re-designate the SAC with a revised boundary, and exclude all demersal mobile fishing methods to protect all the reef habitat that occurs in the combined MPA/SAC.

3.4.8. Luce Bay SAC

3.4.8.1. We asked if you supported management approaches 1,2 or 3 and if you agreed with the economic, social, and environmental assessments.

3.4.8.2. You said:

- Approach 1 would prohibit the use of demersal trawls, mechanical dredges, or suction dredges (boat or diver operated) throughout the SAC was supported by 39 respondents.
- Approach 2 would be the same as Approach 1 but with a derogation to allow mechanical dredging on a seasonal basis in the inner part of the bay. Eight respondents supported this approach and 49 did not.
- Approach 3 would prohibit the use of demersal trawls, or suction dredges (boat or diver operated) throughout the SAC. Mechanical dredging would be managed on a zonal basis. This approach would require industry participation in a monitoring programme. While there was no support for this option, those respondents that indicated they supported none of the approaches felt Approach 3 is the nearest to their preferred approach but without the imposition of a 'curfew'.
- Opinion was divided over the economic, social, and environmental assessments of the impact with more disagreeing.

3.4.8.3. We intend to hold a one day stakeholder workshop to develop a final management proposal.

3.4.9. Noss Head MPA

3.4.9.1. We asked if you supported the management approach and if you agreed with the economic, social, and environmental assessments.

3.4.9.2. You said:

- The management approach would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the MPA. This approach was supported by 27 respondents, one respondent did not support it.
- Opinion was more divided over the economic, social, and environmental assessments.

3.4.9.3. We intend to implement measures as per the consultation.

3.4.10. Sanday SAC

3.4.10.1. We asked if you supported the management approach and if you agreed with the economic, social, and environmental assessments.

3.4.10.2. You said:

- The management approach would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the SAC. This approach was supported by 29 respondents, one respondent did not support it.
- Opinion was divided over the economic, social, and environmental assessments.

3.4.10.3. We intend to implement measures as per the consultation, enhancing them to include set nets on the list of prohibited activities.

3.4.11. Small Isles MPA

3.4.11.1. We asked if you supported management approaches 1 or 2 and if you agreed with the economic, social, and environmental assessments. We also stated that further measures would be required for black guillemot, northern sea fan and sponge communities, and possibly burrowed mud.

3.4.11.2. You said:

- Approach 1 would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) within a defined area. One respondent supported this approach while 24 did not.
- Approach 2 does the same but is based on a more complex polygon to minimise the inclusion of fishing grounds. This polygon would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated). Ten respondents supported this approach, 55 did not.
- A majority of respondents did not support either approach, preferring an alternative which would extend the area of burrowed mud being protected while also allowing scallop and prawn fishing to continue.
- Opinion was divided over the economic, social, and environmental assessments.

3.4.11.3. We intend to implement more ambitious measures that deliver all of the fisheries management for this MPA in one step. This is in contrast to the 2 step approach advocated in the consultation.

3.4.12. South Arran MPA

3.4.12.1. We asked if you supported management approaches 1,2 or 3 and if you agreed with the economic, social, and environmental assessments. We also stated that under approach 1 further measures would be required for burrowed mud.

3.4.12.2. You said:

- Approach 1 would prohibit the use of suction dredges throughout the MPA and prohibit the use of demersal trawls or mechanical dredges within ½ NM of land. Four respondents voiced support for this approach.
- Approach 2 would prohibit the use of suction dredges throughout the MPA and create scallop permit areas with a strict management scheme for mechanical dredging. In addition designated fishing areas for trawlers under 100 Gross Registered Tonnage would be created. There was no support for this approach.
- Approach 3 would prohibit the use of suction dredges throughout the MPA and have the same trawl management as Approach 2. For mechanical dredging a designated fishing area would be created that would be the subject of additional controls. The approach was supported by seven respondents. 102 said they did not support it.
- A large majority of those who commented on this area did not support any of the management approaches put forward and instead wanted to see a complete ban on dredging and trawling across the MPA.
- More respondents said they did not agree with the economic, social, and environmental assessments than agreed.

3.4.12.3. We intend to implement measures based on a much simpler and more ambitious zonal approach. This includes a prohibition on mechanical dredging from the whole MPA to further the recovery of the maerl beds.

3.4.13. St Kilda MPA

3.4.13.1. We asked if you supported the management approach and if you agreed with the economic, social, and environmental assessments.

3.4.13.2. You said:

- The management approach would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the SAC. Twenty-nine respondents supported the management option proposed for this SAC, one did not.
- More respondents said they agree with the economic, social, and environmental assessments than did not.

3.4.13.3. We intend to implement measures as per the consultation and also include a prohibition of set nets.

3.4.14. Treshnish Isles SAC

3.4.14.1. We asked if you supported management approaches 1 or 2 and if you agreed with the economic, social, and environmental assessments.

3.4.14.2. You said:

- Approach 1, which would prohibit the use of suction dredges, demersal trawls and mechanical dredges throughout the site was supported by twenty-four respondents.
- Approach 2 which would allow limited demersal trawling and mechanical dredging on a zonal basis was supported by four respondents.
- Opinion was somewhat divided over the economic, social, and environmental assessments although more respondents agreed than disagreed.

3.4.14.3. We intend to implement management approach 1 and also include a prohibition of set nets.

3.4.15. Upper Loch Fyne & Loch Goil MPA

3.4.15.1. We asked if management approaches 1a or 1b for the flame shell beds and 2a or 2b for other habitat types were supported and if you agreed with the economic, social, and environmental assessments. All approaches would prohibit the use of suction dredges (boat or diver operated) and there would be a vessel capacity restriction of 75 Gross Registered Tonnage.

3.4.15.2. You said:

- Approach 1a (flame shell bed) proposes that no fishing should take place or the deployment or removal of anything onto/ from the seabed within the recovery area. More respondents (18) did not support this approach than did support it (11).
- Approach 1b (flame shell bed) provides the same protection but with a different spatial extent. More respondents (12) said they did not support this approach than did support it (6).
- Approach 2a (rest of habitats) would prohibit the use of demersal trawls or mechanical dredges on a zonal basis. More respondents (23) did not support this approach. Seven said they did support it.
- Approach 2b (rest of habitats) would create designated fishing areas for the use of demersal trawls or mechanical dredges. Eighteen respondents did not support this approach, five said they did support it.
- Opinion was divided over the economic, social, and environmental assessments.

3.4.15.3. We intend to implement a completely revised zonal management approach. This includes a prohibition on mechanical dredging from the whole MPA to further the recovery of the flame shell beds.

3.4.16. Wester Ross MPA

3.4.16.1. We asked if you supported management approaches 1 or 2 and if you agreed with the economic, social, and environmental assessments. We stated that further measures would be required for burrowed mud and circalittoral muddy sand communities under approach 1.

3.4.16.2. You said:

- Approach 1 would deliver a site wide prohibition of suction dredges, a capacity restriction of 150 gross registered tonnage, and zonal management prohibiting the use of demersal trawls or mechanical dredges. Five respondents supported this approach.
- Approach 2 would deliver a site wide prohibition of suction dredges, a capacity restriction of 150 gross registered tonnage, and prohibit the use of demersal trawls or mechanical dredges on a zonal basis for all habitats. Eleven respondents supported this approach while 29 did not.
- While a minority of respondents supported the preferred management option for this MPA, a larger number supported an alternative approach to those put forward in the consultation document.
- Opinion was divided over the economic, social, and environmental assessments.

3.4.16.3. We intend to implement a completely revised zonal management approach. This includes a prohibition on mechanical dredging from the whole MPA to further the recovery of the maerl beds and flame shell beds.

3.4.17. Wyre & Rousay Sounds MPA

3.4.17.1. We asked if you supported the management approach and if you agreed with the economic, social, and environmental assessments.

3.4.17.2. Respondents said:

- The management approach would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the MPA. Twenty-five respondents supported the management option proposed for this MPA, one did not.
- Opinion was divided over the economic, social, and environmental assessments.

3.4.17.3. We intend to implement measures as per the consultation.

4. Introduction

4.1. The Consultation

4.1.1. The 2014 Consultation on the Management of Inshore Special Areas of Conservation and Marine Protected Areas contained 51 questions, covering nine Special Areas of Conservation (SACs) and 11 Marine Protected Areas (MPAs) in Scottish Territorial Waters. These asked for views on proposed management approaches for each MPA or SAC and on the economic, social, and environmental assessments of the impact of these.

4.1.2. The proposed management approaches contained in the consultation were designed to meet the statutory requirements to protect each of the sites. These approaches were accompanied by ecological, economic, and intensity assessment information which informed the design of the approaches.

4.1.3. Where the Consultation document (along with its associated Approaches and Maps documents) outlined more than one potential approach, respondents were also asked for their views on the preferred approach. In some MPAs/SACs respondents were also asked about specific protected features.

4.1.4. The consultation questions are listed in Appendix 1.

4.1.5. The consultation ran from 11th November 2014 to 2nd February 2015.

4.1.6. Responses to this consultation have informed the proposed management measures for each MPA or SAC.

4.2. Background

4.2.1. In July 2014, Scottish Ministers designated 30 MPAs; 17 were in Scottish Territorial Waters (inshore) and 13 in offshore waters. The consultation contained management proposals for 11 of the inshore MPAs. These were prioritised according to the presence of the most sensitive seabed habitats.

4.2.2. Nature conservation MPAs are designed to conserve biodiversity (species and habitats) and geodiversity (the marine landscape and the processes that form these landscapes); these features have been identified for protection either because they are rare, threatened or declining, representative or because our waters hold a significant number of the overall population or total area of the habitat.

4.2.3. SACs are protected sites designated under the EC Habitats Directive for habitats and species that are considered most in need of conservation at a European level (excluding birds which are protected by the EU Wild Birds Directive). Examples of features covered by the EU Habitats Directive include reefs, subtidal sandbanks, and bottlenose dolphin.

4.2.4. Consideration of how the EU Habitats Directive is implemented in the marine environment in Scotland concluded that provisions regarding the assessment of plans and projects should also apply to fishing. A subsequent review of existing arrangements resulted in management proposals for nine SACs, mainly for locations with the most sensitive habitats.

4.3. Responses

4.3.1. Submissions were received from 4,974 respondents. This included 52 standard responses, 144 single area responses (where respondents commented mainly on one MPA or SAC) and 4,778 non-standard responses.

4.3.2. Most of the single area responses related to: Luce Bay; South Arran; and the Small Isles and /or Wester Ross.

4.3.3. Non-standard responses are those where individuals submitted campaign text supplied by a central organisation or group, in this case Scottish Environment LINK and Sunnyside Ocean Defenders. These responses are detailed in Chapter 5 of this report.

4.4. Respondent Profile

4.4.1. For analysis purposes, responses from organisations were assigned to sub-groups. This enabled analysis of whether differences, or commonalities, appeared across the various different types of organisations that responded. Table 4.1 shows the numbers of standard and single area responses in each group.

Table 4.1: Respondent groups (standard and single area responses)

		Standard Responses	Single Area Responses	Total Responses
Total individuals		**11**	**122**	**133**
Organisations:				
	Environment / Conservation	15	2	17
	Inshore Fisheries Group (IFG)	2	1	3
	Industry / Transport	-	6	6
	Mobile fishing	7	1	8
	Local authority	3	-	3
	Local group	2	5	7
	Recreation / Tourism	7	6	13
	Static fishing	4	-	4
	Other	1	1	2
Total organisations		**41**	**22**	**63**
Total Responses		**52**	**144**	**196**

4.4.2. As shown in the table above, 63 organisations responded, either to the whole consultation (41) or in respect of a single area (22). In addition, 133 individuals responded (11 to the whole consultation and 122 in respect of a single area).

4.4.3. A list of all those organisations who submitted a standard response to the consultation is included in Appendix 2.

4.5. Analysis and Reporting

4.5.1. Responses to the yes /no questions were quantified and many results are presented in table format. Where a respondent did not use the consultation questionnaire but gave, within their comments, a clear indication of their support or otherwise for one of the approaches then this information was used to populate the relevant tick boxes.

4.5.2. Comments given at each open question were examined and key themes, similar issues raised or comments made in a number of responses, were identified. In addition, we looked for sub-themes such as reasons for opinions, specific examples or explanations, alternative suggestions or other related comments.

4.5.3. The key themes were looked at in relation to individuals and organisation groupings to ascertain whether any particular theme was specific to one particular group, or whether it appeared in responses across groups.

4.5.4. When looking at sub-group differences, it must be also borne in mind that where a specific opinion has been identified in relation to a particular group or groups, this does not indicate that other groups agree or disagree with this opinion, but rather that they have simply not commented on that particular point.

4.5.5. It should also be borne in mind that in the analysis of responses to a consultation, those in favour of a proposal generally give shorter answers than those opposed. This was found to be the case at many of the questions in this consultation and is reflected in the reporting.

4.5.6. This exercise was a consultation and not a survey. While the consultation gave all those who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to a wider population.

4.5.7. The following chapters document the substance of the analysis and present the main issues and views expressed in responses. These chapters follow the ordering of questions in the consultation document, followed by an analysis of other comments received.

4.5.8. It should be noted that while a large number overall responded to the consultation, there were many single area responses where respondents commented on only one MPA or SAC. Usually ones that were close to their home or of interest to them as well as a substantial number of non-standard (campaign) responses. This means that at the questions on many of the individual sites there are fairly small numbers responding.

4.5.9. Anonymised verbatim comments are used throughout the report to illustrate themes or to provide extra detail for some specific points.

5. Non-Standard Responses

Non-standard responses were received from 4,778 respondents and these are described below.

5.1. Scottish Environment LINK

5.1.1. In total 4,758 responses were submitted via Scottish Environment LINK's campaign page using the text set out below:

Title of letter: Don't Take the P out of MPAs!

I am very concerned that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling. These nature conservation Marine Protected Areas (ncMPAs) and Special Areas of Conservation (SACs) should be managed to help protect AND recover our damaged seas. Scientists are discovering new remnant areas of fragile habitats with every passing year – we should not risk leaving these areas unprotected.

Following the same scientifically precautionary approach, it is important to protect the wider ecosystem in each MPA to support the recovery of those few species and habitats that are explicitly listed as protected features. Many of the proposed management areas are too complex in shape because the boundaries have been drawn so close to protected features – this will both severely constrain the scope for ecosystem recovery and stymie the culture of compliance needed for successful MPAs.

I therefore support the proposals for site-wide prohibition of bottom-towed, mobile fishing gear from the following MPAs:

Treshnish Isles SAC (option 1)
Loch Creran ncMPA /SAC (option 2)
Luce Bay SAC (option 1)
East Mingulay SAC (option 2)
Loch Laxford SAC (option 1 - only option)
St. Kilda SAC (option 1 - only option)
Noss Head ncMPA (option 1 - only option)
Wyre and Rousay ncMPA (option 1 - only option)
Sanday SAC (option 1 - only option)

None of the proposed management approaches in the five sites below will

adequately support the conservation and recovery of the species and habitats to be protected, and so I think there should instead be a site-wide prohibition of bottom-towed, mobile fishing gear in these MPAs:

Loch Sween ncMPA
South Arran ncMPA
Upper Loch Fyne and Loch Goil ncMPA
Lochs Duich, Long and Alsh SAC and ncMPA

None of the proposed management approaches in the five sites below will adequately support the conservation and recovery of the species and habitats to be protected, and so I think there should be a greater reduction of bottom-towed, mobile fishing gear than any of the options presented for these MPAs:

Loch Sunart to the Sound of Jura ncMPA (including Loch Sunart ncMPA and Loch Sunart SAC)
Small Isles ncMPA
Wester Ross ncMPA

I strongly support marine protected areas (MPAs) in Scottish seas. It's an historic opportunity to help reverse the declining health of our marine environment and make a real change for coastal communities and Scotland as a whole. MPAs existing and new need proper protection to ensure responsible stewardship of our shared resources.

Please Don't Take the P out of MPAs.

5.1.2. The majority of respondents that submitted a response in this way were individuals:

- 4,611 were individuals.
- 43 said they were responding on behalf of an organisation or group.
- 104 did not specify.

5.1.3. Looking at the location of the respondents shows:

- 2,092 respondents came from Scotland.
- 2,443 respondents came from other parts of the UK.
- 206 respondents came from outwith the UK.
- 17 respondents did not give an address.

5.1.4. The precise text, as set out above, was submitted by 4,591 of the 4,758 respondents.

5.1.5. A further 122 respondents made small amendments such as changing the title or other words or phrases in order to emphasise a point; others added a small amount of additional information such as background information on their work or hobbies, field of study, or experiences.

5.1.6. Thirty-four respondents who submitted the campaign text included lengthier additional text and nine respondents replaced the campaign text completely with alternative text. The main points made by these respondents included:

- Personal accounts from divers of damage caused by dredging or bottom trawling.
- The need to safeguard the biodiversity of Scottish seas.
- The benefits of marine wildlife tourism and potential negative effect on this if species are affected.
- The need to safeguard the marine environment for future generations.
- The need to protect rare or endangered species.
- That good management now will benefit the fishing industry in the long term.
- The need for stronger management measures in order to comply with EU regulations.
- Examples of positive outcomes from marine management in other countries.

5.1.7. Two respondents altered the campaign text to reflect their views of a need for management options that will help to reverse a decline in the fishing industry.

5.1.8. Alternative text from these respondents, where permission has been given to publish the response, is included in Appendix 3.

5.1.9. In addition a map showing the distribution of these responses is also shown in Appendix 3.

5.2. Sunnyside Ocean Defenders

5.2.1. Twenty responses were received from pupils at a Glasgow Primary School. These responses consisted of a picture and the following text. The pictures are included in Appendix 4.

> We think it's a disgrace that less than 1% of our seas will be protected from fishing. We dread the dredgers. If the oceans die we die. Our Scottish seas can recover but we need to leave them alone and let nature take its place. We are Sunnyside Ocean Defenders and we want to defend our oceans. We want to see more cetaceans and fish swimming free. We're standing for our Scottish seas. Will you?

5.2.2. One young person also quoted Chief Seattle: "What is man without the beasts? If all the beast were gone, man would die of loneliness of the spirit. For whatever happens to the beasts, soon happens to man. All things are connected".

6. Broad Issues

6.1. Article 6 of The EU Habitats Directive

6.1.1. You Said

6.1.1.1. A number of environmentally focused responders stated for each Special Area of Conservation(SAC) that an appropriate Assessment of the management measures must be carried out. Their view was that this was a legal necessity conferred by Article 6(3) of the EU Habitats Directive.

6.1.1.2. The “Sweetman” ruling from the European Court of Justice (ECJ) was also quoted. In the view of responders this ruling stipulated that site integrity of an SAC involves;

'the lasting preservation of the constitutive characteristics of the site concerned that are connected to the presence of a natural habitat type whose preservation was the objective justifying the designation of that site...'.

“In other words, characteristics of the site connected to the designated features, and not just the designated features themselves, should also be preserved. Or, in short, the ecological importance of a site, whilst designated for specific features, is greater as a functioning whole than as merely the sum of its parts.”

6.1.2. We Did

6.1.2.1. The text of Article 6(3) is very clear;

“Any plan or project **not directly connected with or necessary to the management of the site** but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.” (emphasis added)

6.1.2.2. It is the Scottish Government’s view that these proposals are “directly connected with or necessary to the management of the site”. Therefore Article 6(3) does not apply to the proposed prohibitive management measures.

6.1.2.3. The ECJ ruled in Sweetman that;

"it should be inferred that in order for the integrity of a site as a natural habitat not to be adversely affected for the purposes of the second sentence of Article 6(3) of the Habitats Directive the site needs to be preserved at a favourable conservation status; this entails, as the Advocate General has observed in points 54 to 56 of her Opinion, the lasting preservation of the constitutive characteristics of the site concerned that are connected to the presence of a natural habitat type whose preservation was the objective justifying the designation of that site in the list of the SCIs, in accordance with the directive."

In those paragraphs of her Opinion the Advocate General examined the meaning of the expression "integrity" of the site. She stated that "it is the essential unity of the site that is relevant. To put it another way, the notion of 'integrity' must be understood as referring to the continued wholeness and soundness of the constitutive characteristics of the site concerned…..It follows that the constitutive characteristics of the site that will be relevant are those in respect of which the site was designated and their associated conservation objectives."

As the Advocate General noted, at point 57, the effect on the integrity of the site must be 'adverse'. The Appropriate Assessment may determine that the effect of a plan or project on the site will be neutral, or even beneficial.

"Article 6(3) of the Habitats Directive must be interpreted as meaning that a plan or project not directly connected with or necessary to the management of a site will adversely affect the integrity of that site if it is liable to prevent **the lasting preservation** of the constitutive characteristics of the site that are connected to the presence of a priority natural habitat whose conservation was the objective justifying the designation of the site in the list of sites of Community importance, in accordance with the directive. The precautionary principle should be applied for the purposes of that appraisal. (emphasis added)

Temporary loss of amenity capable of being fully undone would be allowed; permanent destruction of part of habitat in relation to whose existence the site was designated is not allowed";

6.1.2.4. The Sweetman ruling relates to the meaning of "site integrity". It is clear from the judgment that adverse effect on site integrity is directly related to the nature of the impact; any permanent loss/ impact upon priority natural habitats would be an adverse effect on the integrity of a site. However temporary effects are acceptable. The test of site integrity applies under article 6(3) of the EU Habitats Directive. We have concluded that article 6(3) does not apply in this case of implementing new management measures. However, it would apply to other fisheries related decisions.

6.2. Section 83 of The Marine (Scotland) Act 2010

6.2.1. You Said

6.2.1.1. Some responders said they had concerns about the rationale for feature- rather than site-led protection. They stated that;

"Paragraph 83(b)(iv) of the Marine (Scotland) Act 2010 requires any public authority to make management decisions based on:

'any ecological…process on which the conservation of any protected feature in a Nature Conservation MPA…is (wholly or in part) dependent'.

Paragraph 83(10) also states that:

'…"damage" includes the prevention of an improvement.

Whilst the primary legal consideration under Paragraph 83(b)(iv) is for the designated ncMPAs to meet their conservation objectives, these provisions should be fundamental and prominent considerations when designing appropriate management measures for the conservation and recovery of features within a site. Article 83(10) signifies a legal requirement to ensure that protected features have the scope to increase in population numbers, extent and/or overall ecological health, which is clearly pertinent to sites with a conservation objective of 'recover'. Furthermore we think this requirement also applies to sites where the conservation objective is 'conserve' or where features are deemed to be of poor conservation status (as assessed by authorities such as the IUCN Red List, the OSPAR list of Threatened and Declining Species and Habitats, or in peer reviewed literature) as, even where this is the case, there still needs to be the possibility of improvement."

6.2.2. We Did

6.2.2.1. Section 83 of the Marine (Scotland) Act 2010 places duties on public authorities where they have the function of determining an application for the doing of an act. These management proposals are prohibiting activities.

6.2.2.2. In s83(10) some terms are given definitions for use in s83 of the Marine (Scotland) Act 2010 only. These include "damage". The interpretation given can only be applied where the word "damage" has been used in s83. The word "damage" is used twice – in s83(4)(b)(ii) and (iii). These only come into play where a public authority intends to grant authorisation for an act which has a significant risk of hindering the achievement of the conservation objectives. This would be used to ensure that the public benefit of the act outweighed the risk of "damage". It would also be used to ensure that the mitigation measures were of equivalent environmental benefit to the "damage".

6.2.2.3. It is also the view of the Scottish Government that the management proposals do provide scope for improvement of all the protected habitats and species. This is irrespective of the conservation objectives.

6.3. The Environmental Report

6.3.1. You Said

6.3.1.1. A recurring theme in comments across multiple sites was regarding the late publication of the environmental report. Responders repeatedly stated that they had not had enough time to consider it.

6.3.2. We Did

6.3.2.1. The Scottish Government acknowledges that the Environmental Report was not published on the day the consultation launched. If fact it did not publish until 2 weeks later. However we are of the view that 10 weeks provided sufficient time for it to be considered.

6.4. Creel Fishing

6.4.1. You Said

6.4.1.1. A wide range of comments were made regarding creel fishing spanning many of the protected areas. A number of themes were identified;

- The economic importance of creel fishing in some of the protected areas.
- The need for further research into the effects of creeling.
- Some wanted to see pre-emptive creel management measures for protected areas.
- Others raised concerns about the number of creels in use overall.

6.4.2. We Did

6.4.2.1. All of these themes are noted. The Scottish Government intends to only implement creel management measures in discrete parts of 4 of the protected areas at this time. This is generally for the most sensitive habitats. We don't accept the need for pre-emptive measures.

6.4.2.2. We acknowledge the need for further research into the effects of creel fishing. We will seek opportunities to undertake this in future, as well considering the results of research being undertaken elsewhere.

6.4.2.3. We would also like to consider with stakeholders what is perceived to be a sensible level of creel fishing in given areas. This would be used to inform future management plan consideration. To begin this dialogue we have chosen 3 protected areas for differing reasons;

Sanday SAC – Some of the consultation responses made it clear how vital the creel fishery was to the local communities there. We would like to work with those communities to ensure that the vital economic importance of that fishery is maintained.

South Arran MPA - There is a lot of local interest in community participation in management planning. Management measures for this site will create an area of burrowed mud that is mobile gear free seven days per week. We would like to work with stakeholders to ensure that if a nephrops creel fishery is established it is developed in a sustainable manner.

Wester Ross MPA – There is also a lot of local interest in community participation in management planning. There has also been concern raised by stakeholders about the number of creels in this area.

6.5. Benefits

6.5.1. You said

6.5.1.1. There were a number of themes relating to benefits of the management measures which were expressed. These were made by a broad range of stakeholders covering many of the sites. These themes were;

- That the consultation document did not contain any information about the economic benefits of the measures.
- That the consultation document was too focused on the potential economic costs to the fishing industry.
- That the "Assessing Options for Change" report made it imperative to ban all mobile gear from Marine Protected Areas.

6.5.2. We Did

6.5.2.1. We acknowledge that there was no value attached to the benefits in the consultation document. These can be difficult to quantify. However the Business and Regulatory Impact Assessments that will accompany the Statutory Instruments will attempt some quantifications.

6.5.2.2. The reason information relating to fishing was included was to estimate the hours / days of displaced effort that could occur. In doing so cost estimates were also produced and therefore included in the documentation. The amount of fishing effort that would be displaced is the primary concern because that activity is likely to be undertaken elsewhere. This can lead to negative environmental effects. However if the activity is displaced then the economic impact will not be as high as estimated. This is because the displaced activity takes place elsewhere and an economic return realised.

6.5.2.3. The methodology used in the “Assessing Options for Change” report has predicted considerable economic benefit from having a 1 mile or 3 mile limit. These benefits were in the long term with the fishing industry bearing the costs in the short term. However there has been no Strategic Environmental Assessment of this to ascertain environmental effects of implementing such a limit. The Environmental Report undertaken for the management measures in this consultation cautioned against 100% displacement from some of the protected areas. Nevertheless the management measures we intend to implement should facilitate some limited scale proofing of the outputs of the “Assessing Options for Change” report to begin.

7. East Mingulay SAC

7.1. Introduction

7.1.1. This area was designated as a SAC for its reefs. The consultation presented two possible management approaches:

- Approach 1 would prohibit the use of any demersal fishing gear on a zonal basis, and apply a vessel capacity restriction of 100 Gross Registered Tonnage (GRT) for access to the SAC. This is, at present, the Scottish Government's preferred approach because it would put in place the necessary management measures to protect the reefs but still allow the relatively low amount of fishing to continue between them.
- Approach 2 would prohibit the use of demersal mobile gears throughout the SAC, and any demersal static fishing gear on a zonal basis.

7.2. We Asked

7.2.1. The consultation asked: 'Do you support the preferred approach (number 1) for managing this protected area?' If you didn't a follow-up question asked if you supported the other approach.

7.2.2. The consultation also asked: 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

7.3. You Said

7.3.1. Nearly twice as many respondents answered 'no' as answered 'yes' with respect to supporting the preferred approach. Table 7.1 summarises the responses received.

7.3.2. Opposition came from a number of respondent groupings and, in particular, from environment /conservation and static fishing respondents.

Table 7.1: East Mingulay SAC - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	3	5	-	125
Environment / Conservation (17)	1	8	1	7
Inshore Fisheries Group (IFG) (3)	1	-	-	2
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	4	-	-	4
Local authority (3)	1	-	-	2
Local group (7)	-	2	-	5
Recreation / Tourism (13)	1	2	-	10
Static fishing (4)	-	3	1	-
Other (2)	-	1	-	1
Total (196)	**11**	**21**	**2**	**162**

7.3.3. An environment /conservation organisation and a static fishing respondent commented without giving an indication of support or otherwise and these are counted in the 'other comments' column in the table above. The static fishing respondent simply stated: "we support proportionate conservation measures with minimum impact on commercial fisheries".

7.3.4. Nine respondents who answered 'no' went on to make additional comments; six of these were environment /conservation organisations who predominantly commented on the need for a more precautionary approach, as did one individual and one static fishing respondent.

7.3.5. The environment /conservation organisation that commented without explicitly answering 'yes' or 'no' felt that "Approach 1 may be the minimum level of management required to meet the conservation objectives of this site". This respondent added that "more research is required to better understand the effects of suspended sediment caused by mobile demersal gear on the qualifying feature and, depending on that information, management approaches be altered accordingly." In addition, the respondent expressed concern that the implementation of zonal management could lead to an increase in fishing activity in the parts of the SAC where mobile demersal gear is permitted. They also noted: "It is important for the integrity of the SAC, and a legal obligation, that an Appropriate Assessment (AA) be completed to assess the impacts of fishing activity on the reef. We have been unable to find any record of an AA being carried out in any of the documents relating to East Mingulay on SNH's website".

7.3.6. The ninth respondent that answered ‘no’ was a local group that expressed outright opposition for the designation of East Mingulay SAC for a variety of reasons. These included damage to the local economy due to fishing restrictions, imposition on the management of local resources by conservation organisations, a perception of an undemocratic and unaccountable process and that this site was not required in order to satisfy a 2004 EU shortfall in SAC’s designated for reefs. The respondent added that “the Mingulay cold water coral’s importance was misleadingly described as being unique in “inshore” or “territorial” waters. EU requirements for marine SAC’s make no distinction between sites found in offshore or inshore waters”.

7.3.7. Other specific points made in the additional commentary from those who answered ‘no’ included:

- Concern regarding potential secondary effects of trawling around the reef and potential accidental damage by gear snagging.
- Concern regarding what might be deemed bias in favour of the commercial fishing sector.

7.3.8. Seven respondents who answered ‘yes’ offered additional comments, predominantly supporting the use of zonal activity for mobile fishing in order to balance conservation and socio-economic needs and impacts. One mobile fishing respondent questioned why a 100GRT limit was proposed rather than 150GRT, which the respondent felt would better reflect the economic needs of the fishing fleet in the area. Two other mobile fishing respondents questioned the need for any upper limit.

7.3.9. Those who did not support the preferred option were asked: ‘Do you support the other approach?’ and 18 of the 21 respondents who had not supported Approach 1 answered ‘yes’ they supported the alternative approach. Many of these went on to comment that they preferred an outright ban on all mobile fishing in the interests of greater protection.

7.3.10. The three respondents that answered ‘no’ and did not support either approach were an individual who offered no additional comment. A local group whose key objections are detailed at para 4.6 above, and an environment /conservation respondent suggesting a third option of ‘no take’ throughout the SAC.

7.3.11. Finally, eleven respondents answered ‘no’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches and nine respondents answered ‘yes’.

7.3.12. The eleven respondents that answered ‘no’ comprised six environment /conservation organisations, two individuals, one mobile and one static fishing respondent and one local group.

7.3.13. The main theme in additional comments from those who answered ‘no’, and particularly from environment /conservation organisations, was that the assessment has failed to consider fully the benefits that the proposed measures may bring. A local group however commented to the contrary, suggesting that too much emphasis was placed on counting intangible benefits and not enough on the direct local economic and employment impacts.

7.3.14. A mobile fishing respondent who answered ‘no’, as well as two others who commented without giving a ‘yes’ or ‘no’ answer, referred to a lack of time to consider the environmental report. Two of these respondents added that they reserve judgement on the economic and social assessments due to their recall of discussions during stakeholder engagement regarding the relevance and completeness of data provided.

7.3.15. The nine respondents who answered ‘yes’ comprised four individuals, one local group, one local authority, one IFG, one mobile fishing and one static fishing respondent. Those who commented further generally reiterated their agreement with the economic, social and environmental assessments of the impact of the management approaches.

7.3.16. An academic /scientific respondent made comments without specifically answering either ‘yes’ or ‘no’ and emphasised the importance of monitoring and research on an ongoing basis, adding “The general adaptive management approach being taken, of zonal controls within protected areas and minimal buffer zones around protected habitats, will require extensive monitoring to be effective”. The same respondent commented:

> “The Business and Regulatory Impact Assessments (BRIA) concentrates on the economic impact of lost fishing activity, producing a worst case scenario where all restricted activity is lost rather than displaced. The environmental assessment focusses on the possible impact on surrounding areas of displaced fishing activity. There is no assessment of the levels of risk of impact on the reef habitat associated with the different levels of protection under approaches 1 and 2. It is important to carry out the work recommended on suspended particulates and buffer zones, particularly if approach number 1 is chosen. The additional financial costs involved in providing adequate monitoring and assessment of buffer zones for approach number 1 could easily outweigh the potential savings of reducing displaced fishing activity, but this discussion is absent from the economic assessment.”

7.3.17. An environmental /conservation organisation that answered neither ‘yes’ nor ‘no’ highlighted concerns about the secondary effects of trawling on and around the reef and potential accidental damage by gear snagging. This respondent referenced research suggesting the Mingulay reefs present an important shallow water refuge from acidification, potentially making them the most valuable Lophelia reefs in the EU. The respondent also quoted from an SNH commissioned designation report that identified a need for more work regarding the effectiveness of the buffer zone in “preventing fine grained sediments re-suspended by trawling from smothering living reef habitat”. This respondent reiterated their support for Approach 2 and added that there should be careful regulation to ensure that creeling is carried out at sustainable levels within the designated zones. They also identified an opportunity for further research on the impacts of creels on seabed habitats within the fishing zones to ensure action can be taken if damage by creels to the reef is observed.

7.3.18. A static fishing respondent who answered ‘no’ and an individual who answered ‘yes’ both made comments in support of creeling activity.

7.4. We Did

7.4.1. Concerns about Appropriate Assessments and creel fishing have been addressed in the broad issues section.

7.4.2. The Scottish Government has concluded that the ecological value of the East Mingulay SAC needs to be maintained. To achieve this the risk to the Lophelia Pertusa reefs from demersal mobile fishing gear needs to be minimised. The main risk is direct impact from fishing gear but there are also secondary risks from sedimentation.

7.4.3. Therefore we have concluded that exclusion of demersal mobile fishing gear from the whole SAC is the best way to minimise those risks.

7.4.4. We intend to implement the following measures, by an Order under the Inshore Fishing (Scotland) Act 1984;

- A site wide prohibition on the use of suction dredge, mechanical dredge, demersal trawl, and beam trawl.
- In addition, the contiguous area around the Lophelia reefs will also prohibit the use of any demersal static fishing gears.

7.4.5. The measures and their ecological value are shown in appendix 7.

8. Loch Creran MPA /SAC

8.1. Introduction

8.1.1. Loch Creran MPA was designated to protect the flame shell beds while Loch Creran was designated as a SAC for its reefs.

8.1.2. The consultation presented two possible management approaches for this area. These are in addition to the existing restrictions on trawl, scallop dredge, and creel activity already in place for the protection of the serpulid aggregations and horse mussel beds. The proposed approaches were:

- Approach 1 would prohibit the use of suction dredges (boat or diver operated) throughout the MPA /SAC. A new spatial measure would prohibit trawling at Eriska Narrows where there is a flame shell bed.
- Approach 2 would prohibit the use of trawls and suction dredges (boat or diver operated) throughout the MPA /SAC.

8.2. We Asked

8.2.1. The consultation asked: 'Do you support the preferred approach (number 1) for managing this protected area?' Follow up questions were asked, including whether the alternate approach would be supported.

8.2.2. The consultation also asked whether there should be a permit scheme to maintain trawl effort at current levels under approach 1.

8.2.3. The consultation also asked: 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

8.3. You Said

8.3.1. Opinions were extremely mixed in relation to the support of the proposed approaches.

8.3.2. With respect to support for the preferred approach ten respondents answered 'yes', including the three mobile fishing respondents; 19 respondents answered 'no' including the three static fishing respondents who specified a response. Opinions were divided amongst environment /conservation organisations although only two supported Approach 1, compared with eight who did not. A full summary of the responses can be found in Table 8.1.

Table 8.1: Loch Creran MPA/SAC - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	3	5	-	125
Environment / Conservation (17)	2	8	-	7
Inshore Fisheries Group (IFG) (3)	-		-	3
Industry / Transport (6)	-		-	6
Mobile fishing (8)	3		-	5
Local authority (3)	1		-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	-	2	-	11
Static fishing (4)	-	3	1	-
Other (2)	-		-	2
Total (196)	**10**	**19**	**1**	**166**

8.3.3. One static fishing respondent commented without giving an indication of support or otherwise and this response is shown in the 'other comments' column in the table above. The respondent simply stated: "we support proportionate conservation measures with minimum impact on commercial fisheries".

8.3.4. Fifteen respondents went on to make further comments, seven of those who supported the preferred approach and eight - comprising seven environment /conservation organisations and an individual - who opposed it.

8.3.5. The main themes from the seven environment /conservation organisations and the individual respondent who did not support Approach 1 related to concerns over potential damage from trawling activity throughout the site and a belief that Approach 1 is not sufficiently precautionary. Further, an environment /conservation respondent that answered 'yes' commented that Approach 1 provided the lowest level of management required to meet the conservation objectives of the MPA /SAC. The respondent stressed the importance of monitoring activity if this approach is chosen and added: "This is particularly important in this MPA/SAC as this part of the west coast of Scotland has other protected areas from which displaced fishing effort could impact upon Loch Creran MPA /SAC".

8.3.6. One environment /conservation respondent commented that "all" potential fishing impacts on the site should be prevented and another that they would prefer a 'no take' throughout the SAC. The latter added that "any attempt to open this SAC will be subject to Hebridean Partnership advising the EC".

8.3.7. Another environment /conservation respondent noted support for continuation of creeling "providing it is operated at environmentally sustainable levels and an appropriate assessment is carried out to determine its potential impacts on the features".

8.3.8. The key theme in comments from the seven respondents supporting Approach 1 related to the balance it affords between sustainable commercial fishing interests and maintaining conservation objectives for protected features.

8.3.9. Two environment /conservation organisations added: “additional restrictions as proposed under Approach 2 are unnecessary as it is evident that the features requiring additional protection are effectively self-protecting due to the nature of the habitat. While recognising that the costs involved are relatively small, opportunities here are important for those involved”.

8.3.10. A local authority additionally commented: “There are however no management proposals to restrict or prohibit the commercial collection of horse mussels from Loch Creran which is a gap in management of the SAC which was identified by the Argyll SAC Management Forum a number of years ago”.

8.3.11. Respondents were also asked: ‘Under the preferred approach should there be a permit scheme to maintain trawl effort at current levels?’ Sixteen respondents answered ‘no’ whilst five answered ‘yes’. Fourteen respondents, 11 who answered ‘no’ and three who answered ‘yes’ added further comments

8.3.12. Two individuals, two environment /conservation organisations and a tourism /recreation respondent that answered ‘no’ commented to the effect that no trawling /dredging should be permitted whatsoever. Two of these also commented that there should be compensation and/or alternative work found for the single boat that would be affected.

8.3.13. A further two environment /conservation respondents that answered ‘no’, and a third that answered nether ‘yes’ nor ‘no’, commented that appropriate assessment of impact should be undertaken before a permit scheme is considered. Another environment /conservation respondent that answered ‘yes’ expressed a similar view that an assessment is needed.

8.3.14. Three mobile fishing respondents that answered ‘no’ expressed concern that a permit system could impose future restrictions on the current low-level activity.

8.3.15. One individual respondent suggested that a non-transferrable permit should be issued to protect the livelihood of the fisherman who works there.

8.3.16. A local authority expressed support for a permit scheme if it was necessary but noted “that there is already a restriction in the size of trawling vessel which can fish in the loch i.e. greater than 10m vessels are prohibited”.

8.3.17. Those who did not support the preferred option were asked: ‘Do you support the other approach?’ and fifteen respondents answered ‘yes’ whilst four answered ‘no’.

8.3.18. Ten respondents who supported the alternative approach made additional comments, as did two respondents who answered ‘no’. The comments made by those who supported Approach 2 largely served to reiterate and reinforce reasons given for being opposed to Approach 1. Additional comments included:

- The suggestion of an ecological case to be made for the MPA boundary to be extended to Appin narrows.
- A suggestion as to ways of re-employing the fishing boat currently using the site, either as a patrol vessel or through grants to develop alternative fisheries.
- A suggestion that greater consideration should be given to the interests of creel fishermen.
- Support for sustainable /non-damaging levels of creeling, subject to Appropriate Assessment and monitoring of its impacts.

8.3.19. The respondents who did not support the alternative approach were an individual who commented they would support Approach 2 if scallop dredging was also prohibited and an environment /conservation organisation that cited a potential bias in favour of commercial fishing and suggested consideration of ‘no take’ throughout the SAC.

8.3.20. Finally, eight respondents, comprising three individuals, two static fishing, one environment /conservation, one local authority and one local group answered ‘yes’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches. Ten respondents, comprising five environment /conservation organisations, two individuals, a recreation /tourism organisation, a local group and a mobile fishing respondent answered ‘no’.

8.3.21. Ten respondents made further comments at this question.

8.3.22. Three environment /conservation respondents that answered ‘no’ commented that that the assessment has failed to consider the benefits that the proposed measures may bring, whether economic, social, health and/or environmental. A fourth suggested that: “consideration of economic benefit under Approach 2 does not assess the potential economic benefit for the single trawler of switching exclusively to creels, for which there is the potential for that skipper to be the only one licensed to creel in the sea loch system”.

8.3.23. Two respondents in the mobile fishing group that did not answer ‘yes’ or ‘no’ commented on lack of time to review the environmental report. Both respondents added that they reserve judgement on the economic and social assessments due to their recall of discussions during stakeholder engagement regarding the relevance and completeness of data provided.

8.3.24. An individual that answered ‘yes’ commented: “The balance between complete closure and economic impact to a small community is a fine one, so compliance to zoning and other management options will be important. A non-transferrable licence scheme would be possible here, either under Inshore Fishing Act or Marine Conservation Order. Control of recreational creelers will be important in such a sensitive habitat”. Another individual respondent simply felt there was “too little information”.

8.3.25. A local authority agreed that there is unlikely to be any significant financial impact on activities or displacement of fishing activity from the proposed measures in Approach 1. A tourism /recreation organisation observed that there are successful existing measures in place to manage anchoring and mooring at this site, which the respondent felt should be acknowledged as part of the assessment.

8.4. We Did

8.4.1. As a SAC for Serpulid reefs and horse mussel reefs, and a MPA for flame shell beds Loch Creran can be considered to be a biogenic reef hotspot. The Scottish Government would like it to remain so, and therefore propose measures to minimise risk to these wonderful habitats. The Scottish government does not consider the habitats of Loch Creran as self-protecting.

8.4.2. The case for extension of this site (or indeed any others) will be part of the network review process that will take place in 2018. The calls for Appropriate Assessment have been addressed in the broad issues section.

8.4.3. Scallop dredging is already prohibited by the existing measures which is why it wasn’t explicitly covered in Approach 2.

8.4.4. The lack of economic data for Loch Creran is driven by no overlap from the SCOTMAP process with trawl data.

8.4.5. The original preferred approach was an enhancement of the existing management measures that are in place.. However through the consultation it has been identifies that this may not be sufficient to allow maintenance or enhancement of these habitats. The one vessel which would be affected already has creel fishing capability which means there is a low impact.

8.4.6. To minimise the risks associated with static gears the areas within the loch were creeling can take place need refinement to provide greater protection to the biogenic reef habitats. This is to enable enhancement rather than prevent deterioration. This new spatial constraint negates the need of any other form of creel fishing control or limitation.

8.4.7. The existing The Inshore Fishing (Prohibited Methods of Fishing) (Loch Creran) Order 2007 (SSI 2007/185) will be revoked and replaced by the new measures.

8.4.8. We intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- The following activities will be prohibited throughout the Loch Creran SAC /MPA – suction dredging, mechanical dredging, beam trawl, all other forms of trawling / seining (including pelagic), set nets, long lining, and creeling.
- By way of derogation creeling will be permitted in 2 specified zones.
- The removal of horse mussels will also be prohibited.

8.4.9. The measures and their ecological value are shown in appendix 8.

9. Loch Laxford SAC

9.1. Introduction

9.1.1. Loch Laxford SAC was designated for the constituent habitats of its "large shallow inlet and bay". The consultation presented one management approach for Loch Laxford SAC:

- The use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) would be prohibited throughout the SAC.

9.2. We Asked

9.2.1. The consultation asked: 'Do you support the management approach for this protected area?'

9.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

9.3. You Said

9.3.1. Only 26 respondents gave direct answers and a very large majority of these supported the preferred approach. Table 9.1 summarises all the responses received.

Table 9.1: Loch Laxford SAC - Support for management approach

	Yes	No	Other comments	No reply
Individuals (133)	6	1	-	126
Environment / Conservation (17)	8	1	-	8
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	3	-	-	5
Local authority (3)	-	1	-	2
Local group (7)	-	1	-	6
Recreation / Tourism (13)	2	-	-	11
Static fishing (4)	3	-	1	-
Other (2)	-	-	-	2
Total (196)	**22**	**4**	**1**	**169**

9.3.2. One static fishing respondent commented without giving an indication of support or otherwise and this response is shown in the 'other comments' column in the table above. The respondent simply stated: "we support proportionate conservation measures with minimum impact on commercial fisheries".

9.3.3. Nineteen of the respondents who answered ‘yes’ or ‘no’ went on to add comments. The main theme in these comments was outright support for prohibiting the use of demersal trawls, mechanical dredge, or suction dredges throughout the SAC.

9.3.4. A sub-theme from six respondents (three who answered ‘no’ and three who answered ‘yes’) related to static fishing or creeling specifically.

9.3.5. A local authority, an individual and an environment /conservation organisation who answered ‘no’, together with another environment /conservation respondent who answered ‘yes’, felt that static fishing should be prohibited or at least limited. Conversely, an individual and a static fishing respondent, both of whom answered ‘yes’, expressed support for the approach because it would not impact on creeling or other static fishing.

9.3.6. Other comments included:

- Support for further investigation into the use of static gear and potential interactions with sensitive features within the loch, with a view to establishing safeguards against any future increase in effort or scale of static gear use in the site.
- Concern that the extent of existing static gear activity is underestimated and that creel fishing pressure may already be greater than currently recorded.
- The need for monitoring to determine the impacts of the designation and management on the area.

9.3.7. Eleven respondents (five individuals, three environment /conservation, two static fishing and one recreation /tourism) answered ‘yes’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches. Only two of these respondents went on to make further comment. An environment /conservation respondent suggested an assessment of mussel farming activity in Loch Laxford SAC and an individual commented on the need to regulate nomads and unlicensed recreational creeling vessels to avoid damage and over fishing.

9.3.8. Six respondents answered ‘no’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches and additional comments from five of these respondents included:

- Three environment /conservation respondents commented that the assessment has failed to consider the benefits that the proposed measures may bring, whether economic, social, health and/or environmental.
- A local authority suggested a need for pre-emptive measure relating to potential negative effects from static gear rather than making provision should a future need be identified.

- A mobile fishing respondent noted that the environmental report on management measures was not available at the beginning of the public consultation.

9.3.9. Two other respondents in the mobile fishing group did not answer 'yes' or 'no' and commented on lack of time to review the environmental report.

9.4. We Did

9.4.1. Please see broad issues section regarding creel fishing and the environmental report.

9.4.2. Loch Laxford is already subject of a seasonal closure to mobile gear. It is rarely used during the rest of the year by mobile gear vessels. Therefore a change in mobile gear management is unlikely to cause any change in creel fishing. Therefore the Scottish Government sees no need to restrict creel fishing in Loch Laxford SAC at this time.

9.4.3. Comments relating to mussel farming have been passed to the relevant authorities.

9.4.4. The current seasonal closure will be revoked and replaced with all year round measures. The reason for revocation is that the existing closed area line is slightly different from the SAC boundary.

9.4.5. We intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing gears – suction dredge, mechanical dredge, beam trawl, and demersal trawl – throughout the SAC.

9.4.6. The measures and their ecological value are shown in appendix 9.

10. Loch Sunart to Sound Of Jura MPA

10.1. Introduction

10.1.1. The Loch Sunart to the Sound of Jura MPA was designated to protect a resident population of common skate. The Loch Sunart MPA was designated to protect small clusters of serpulid and extensive flame shell beds and northern feather star aggregations. The area was designated as a SAC for its reefs and otters. The SAC includes both Loch Sunart and Loch Teacuis.

10.1.2. The consultation presented two possible management approaches for this area. In both approaches the use of suction dredges (boat or diver operated), long lines, bottom set nets and trawl tickler chains would be prohibited and demersal trawling and mechanical dredging would be prohibited in part of the area. In addition, the deployment of creels along with anchoring would be prohibited in Loch Teacuis.

- Approach 1 also provides spatial protection for the various habitats and the deep areas where mature common skate tend to reside.
- Approach 2 builds on the first by adjoining three of the deep areas to include shallower waters and provide connective protection for transient common skate. This is, at present, the Scottish Government's preferred approach because it would protect the common skate whilst in the deep areas that they are known to inhabit. It also gives protection to the shallower waters that connect the three areas together which should help protect transients.

10.2. We Asked

10.2.1. The consultation asked: 'Do you support the preferred approach (number 2) for managing this protected area?' A follow up question asking about support for the alternate approach was also asked.

10.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

10.3. You Said

10.3.1. Ten respondents answered 'yes' whilst 31 respondent answered 'no' in response to whether they support the preferred management approach. Table 10.1 summarises the responses received.

10.3.2. There was no respondent grouping where a majority of those answering supported Approach 2. Opposition was particularly evident from environment /conservation and recreation /tourism respondents.

10.3.3. Mobile fishing and static fishing respondents were divided in their views, as were individual respondents.

10.3.4. Neither of the local authorities that answered the question supported the preferred approach.

Table 10.1: Loch Sunart to Sound of Jura MPA - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	5	6	-	122
Environment / Conservation (17)	1	11	-	5
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	1	5
Mobile fishing (8)	2	2	-	4
Local authority (3)	-	2	-	1
Local group (7)	1	2	-	4
Recreation / Tourism (13)	-	6	-	7
Static fishing (4)	1	2	1	-
Other (2)	-	-	-	2
Total (196)	**10**	**31**	**2**	**153**

10.3.5. One static fishing respondent and one industry /transport organisation commented without giving an indication of support or otherwise and these are counted in the 'other comments' column in the table above. The static fishing respondent commented here, as in other areas, that they "support proportionate conservation measures with minimum impact on commercial fisheries".

10.3.6. The industry /transport respondent expressed the view that an anchoring ban in 'inner' Loch Teacuis is not justified based on available information, although the respondent expressed a willingness to reconsider should a diver survey reveal the presence of protected species in the area. A similar view was put forward by a recreation /tourism organisation that did not support the proposed approach.

10.3.7. In total, 23 respondents that answered 'no' made further comments and the key themes emerging from the comments of those opposed to the proposed approach were that dredging and trawling should be prohibited throughout the whole of the MPA and that the proposals provide inadequate protection, particularly with regard to skate. Four environment /conservation respondents also added a suggestion that trawling, in addition to dredging, should be excluded within the Firth of Lorn SAC., one said: "Any attempt to open the Firth of Lorn SAC will be subject to Hebridean Partnership advising the EC".

10.3.8. Other comments from respondents that answered ‘no’ included:

- That policing of the area by the public will be difficult if the ban on demersal fishing is only in certain selected spots (individual); a recreation /tourism organisation also felt that not enough consideration has been given to vessel policing measures.
- That there is a perceived bias in favour of the commercial fishing sectors (environment /conservation); a recreation /tourism organisation also commented that undue attention is placed on the interests of the mobile fishing fleet.
- That the preferred approach undermines the scientific approach at the heart of the wider process (environment /conservation).
- That monitoring of protected areas before and after management approaches are implemented is essential (environment /conservation).
- That the area closed to fishing is “poorly defined” (local authority).
- A request for clarification as to how moorings and a shellfish farm with consent in Loch Teacuis have been assessed with regards to fisheries impacts (environment /conservation).
- That there is a lack of evidence to support closing additional areas to mobile fishing (local authority supporting the alternative approach) and that further consideration of the socio-economic impacts is needed (two mobile fishing respondents supporting the alternative approach).

10.3.9. Eight of the ten respondents who supported the proposed approach made additional comments. The main themes emerging from their comments related to greater protection for the marine environment, particularly for skate, and that skate move between shallow and deep waters. One respondent, a mobile fishing organisation, noted the benefits to the coastal communities and the economy of keeping some areas open to trawling and fishing.

10.3.10. Those who did not support the preferred option were asked: ‘Do you support the other approach?’ and only three respondents, a local authority and two mobile fishing respondents as referenced above, answered ‘yes’. They commented again that there was insufficient evidence to support the need for Approach 2.

10.3.11. Twenty-eight respondents answered ‘no’, supporting neither Approach 1 nor Approach 2.

10.3.12. Twenty-four of the respondents who answered ‘no’ added comments. The key themes were predominantly reiterations of concerns already expressed regarding Approach 2, particularly that there is insufficient protection for skate and that a total ban on demersal trawling and dredging is required throughout the MPA.

10.3.13. In short, many respondents that commented were of the view that if Approach 2 provided inadequate protection then Approach 1 would be worse still. As one environment /conservation respondent expressed it: “Being less ambitious than Approach 2, Approach 1 is certainly unsuitable to ensure the site achieves its conservation objectives, which themselves fall short of helping underpin the population recovery of this critically endangered species that is needed”. The respondent added: “We contend that the conservation objective for common skate should be 'recover' at this site”.

10.3.14. There were additional comments on the challenges in policing small areas and preventing illegal dredging, as well as some doubts expressed as to whether either approach will meet the Scottish Government’s obligation to achieve ‘good environmental status’ by 2020.

10.3.15. One local group noted that complete prohibition of mobile demersal gear might impact on some vessels in the short term and expressed the view that it would be important that Marine Scotland supports affected fishermen during the transition.

10.3.16. One individual respondent that supported neither approach felt that commercial fishing should be allowed to continue at current levels but expressed concern that the current tagging regime may be causing some mortality amongst common skate.

10.3.17. Finally, in this section, eight respondents answered ’yes’ and 20 respondents answered ‘no’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches.

10.3.18. Twenty-six respondents added comments, comprising five who answered neither ‘yes’ nor ‘no’, 18 that answered ‘no’ and three that answered ‘yes’.

10.3.19. The main theme, predominantly from respondents that answered ‘no’, was that the potential value and benefits that might be realised from a ban on mobile fishing are underestimated.

10.3.20. Respondents from a variety of groupings commented on the potential value of the recreational sector that might be realised through prohibiting mobile fishing. A local authority, a recreation /tourism organisation, an individual and an environment /conservation respondent also cited the potential to expand scallop diving if mobile gear is prohibited.

10.3.21. Two environment /conservation respondents commented that the assessment has failed to consider other additional benefits that the proposed measures may bring such as social, health or environmental.

10.3.22. Several environment /conservation respondents also commented that more radical measures are needed to protect common skate and that any level of bycatch is concerning. One of these respondents added that it is important to clarify whether the proposals are for one or both of two variant species of the common skate, the flapper skate (Dipturus intermedia) and the blue skate (D. flossada). The respondent also commented that "the list of PMFs must also be updated to clarify any differences in conservation priorities that may apply to the two species."

10.3.23. Two mobile fishing respondents referred to a lack of time to consider the environmental report and added that they reserve judgement on the economic and social assessments due to their recall of discussions during stakeholder engagement regarding the relevance and completeness of data provided.

10.3.24. Other comments included:

- That compliance is more of an issue than the economic impacts per se (individual respondent answering 'yes').
- That there is a need to consider the effects of creel fishing in relation to limitations on fishing and leisure activity (mobile fishing respondent answering neither 'yes' nor 'no).
- An observation that an electricity cable to be laid this summer crosses the area and this could be an additional consideration (mobile fishing respondent answering neither 'yes' nor 'no).
- That "there appears to be contradictory information in the fact that the estimated costs for both approaches is given as being equal yet scallop dredge activity is estimated as being in the medium to high range" (mobile fishing respondent answering neither 'yes' nor 'no).
- That a ban on anchoring in the Inner Basin of Loch Teacuis will adversely affect recreational sailors and that there is no evidence as to why a voluntary approach would not be viable. This respondent also commented that criteria for moorings should be established (recreation /tourism respondent answering 'no').

10.4. We Did

10.4.1. Comments relating to the environmental report and benefits have been addressed in the broad issues section

10.4.2. The Scottish Government accepts that common skate are a globally endangered species. While Scotland can't achieve global recovery alone we can make a contribution. However we remain of the view that the site level conservation objective should be "conserve".

10.4.3. The PMF list published on 24 July 2014 specifically states that common skate applies to both *D. flossada*, and *D. intermedia*. Even if it was one or the other the proposed measures would bring conservation benefit to all components of the Dipturus family. Marine Scotland does not consider there to be any difference in the conservation priority for these species for fisheries management purposes.

10.4.4. It is also accepted that management of the Firth of Lorn SAC should be normalised in line with proposed measures for other reef SACs. We also accept that we need to do more for protection of common skate, but do not think a complete prohibition of mobile gear is a proportionate response.

10.4.5. It is also accepted that control of anchoring in Loch Teacuis can be achieved without statutory measures though the management plan. Marine Scotland intends to work with the Royal Yachting Association, other stakeholders, and Scottish Natural Heritage to deliver this.

10.4.6. For Loch Sunart MPA / SAC we intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, demersal trawl, long lines, bottom set nets, and creel fishing - throughout the MPA / SAC.
- By way of derogation creel fishing will be permitted everywhere except Loch Teacuis.
- The removal of horse mussels will also be prohibited.

10.4.7. For Loch Sunart to Sound of Jura MPA (minus Loch Sunart) and the Firth of Lorn SAC we intend to implement the following measures using a Marine Conservation Order under the Marine (Scotland) Act 2010;

- To prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, demersal trawl, long lines, and bottom set nets - throughout the MPA / SAC with a small extension bridging the gap between the 2 sites that incorporates a deep water area known to be utilised by common skate.
- By way of derogation mechanical dredge and demersal trawl (subject to a no tickler chain technical measure) will be permitted in specified areas.
- The existing prohibition on scallop dredging - The Inshore Fishing (Prohibited Methods of Fishing) (Firth of Lorn) (No. 2) Order 2007 (SSI 2007 / 240) - will be revoked and replaced by these measures.

10.4.8. The measures and their ecological value are shown in appendix 10.

11. Loch Sween MPA

11.1. Introduction

11.1.1. Loch Sween MPA was designated to protect its burrowed mud, maerl beds, native oysters, sublittoral mud and mixed sediment communities.

11.1.2. The consultation presented two possible management approaches for this area:

- Approach 1 would prohibit suction dredging (boat or diver operated) throughout the MPA and restrict activities on a zonal basis. Further consideration would be required in respect of sublittoral mud and mixed sediment communities.
- Approach 2 builds on the first by increasing the level of zonal protection. In addition a curfew on mechanical dredging would be implemented in the outer part of the MPA to limit pressure on the habitats there.

11.2. We Asked

11.2.1. The consultation asked: 'Do you support the preferred approach (number 2) for managing this protected area? A follow up question asking about support for the alternate approach was also asked.

11.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

11.3. You Said

11.3.1. Ten respondents answered 'yes' in support of the preferred approach, whilst 17 respondents answered 'no'. Environment /conservation organisations accounted for nine of the 17 respondents that did not support the preferred approach and only one environment /conservation respondent answered in the affirmative. Table 11.1 summarises the responses received.

Table 11.1: Loch Sween MPA - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	4	3	-	126
Environment / Conservation (17)	1	9	-	7
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	2	-	1	5
Local authority (3)	1	-	-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	1	2	-	10
Static fishing (4)	-	2	1	1
Other (2)	-	-	-	2
Total (196)	**10**	**17**	**2**	**167**

11.3.2. Two respondents commented without giving an indication of unqualified support or otherwise and these are counted in the 'other comments' column in the table above. A mobile fishing respondent answered that they "partially" supported the preferred approach and a static fishing respondent stated "we support proportionate conservation measures with minimum impact on commercial fisheries".

11.3.3. Nineteen respondents, eight that answered 'yes', nine that answered 'no' and two others, made further comments.

11.3.4. The major theme in comments from those that did not support the preferred approach was that mechanical dredging /trawling should be removed from the entire area. Two environment /conservation organisations commented that the zone of no demersal trawl or mechanical dredge should potentially be extended to better protect Maerl outside of the Loch boundary.

11.3.5. Another environment /conservation respondent specifically recommended the prohibition of hand gathering in Loch Sween in order to eliminate any possibility of native oyster being removed when fishing for other shellfish species.

11.3.6. Two mobile fishing organisations, one that fully supported and one that partially supported the preferred approach, commented that Approach 2 with a 6 month winter closure would be a fair proposal. Two others commented that they supported the approach because they had been advised that it would negate the need to revisit management measures, specifically for burrowed-mud.

11.3.7. A local authority and a mobile fishing respondent both noted that the measures under Approach 2 may necessitate consideration of the extent of creel fishing in the area.

11.3.8. The other themes in comments from those supporting the preferred approach focused on the need for conservation and protection.

11.3.9. Those who did not support the preferred option were asked: ‘Do you support the other approach?’ and all seventeen answered ‘no’.

11.3.10. The predominant theme from 15 respondents that made additional comments was that Approach 1 provided even less protection and conservation than the preferred approach and that all trawling /dredging should be excluded. One environment /conservation respondent suggested consideration to ‘no take’ in the area.

11.3.11. Three respondents made comment that temporal restrictions are ineffective and quoted examples of the disturbance impacts that would be likely.

11.3.12. Six respondents answered ‘yes’ and 13, including six environment /conservation organisations, answered ‘no’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches.

11.3.13. Seventeen respondents, 11 who answered ‘no’, two that answered ‘yes’ and four others, made comments regarding the economic, social, and environmental assessments of the impact of the management approaches.

11.3.14. Three respondents commented on economic and employment advantages associated with closing inshore areas to mobile gear, and cited evidence from the Isle of Man that “closed areas benefit the fishing industry by reseeding fished areas”.

11.3.15. Conversely, two mobile fishing respondents commented that economic considerations needed to be taken into account; one added: “a 6 month closure is a sufficient enough to respect environmental considerations”. Two other mobile fishing respondents referred to a lack of time to consider the environmental report and added that they reserve judgement on the economic and social assessments due to their recall of discussions during stakeholder engagement regarding the relevance and completeness of data provided.

11.3.16. Three environment /conservation respondents commented that prohibition on the use of mobile demersal gear should be extended throughout the entire MPA in order to meet the conservation objectives. Respondents referred to information, which they said had been provided at the stakeholder workshops, which suggested that maerl beds had been severely damaged throughout the site.

11.3.17. A further two environment /conservation respondents commented that the assessment has failed to consider the benefits that the proposed measures may bring, whether economic, social, health and/or environmental.

11.3.18. Other comments included:

- A suggested assessment of static gear use in the site and consideration of precautionary safeguards against any future increase in effort or scale of static gear.
- An observation that the static gear assessment shows low activity, perhaps as a result of mobile gear activity.
- A suggestion that the figures given for the income from shellfish fishing are overestimated.
- A suggested need for compliance and management approaches to minimise honey-potting, nomads and recreational creelers and divers.
- Agreement from a local authority that the proposed measures present an appropriate balance between environmental protection and socio-economic impact on activities.

11.4. We Did

11.4.1. Comments relating to creel fishing and benefits have been addressed in the broad issues section.

11.4.2. The Scottish Government accepts that the maerl records at the mouth of the loch should be protected from mobile gear fisheries. However the statements made by some respondents relating to discussions at the October management forum are incorrect. At no time did anyone from Scottish Government or Scottish Natural Heritage say that damage to maerl beds had been caused by fishing activity. The truth is nobody knows what has happened but it's known that the records stated that the maerl bed was "sparse" as far back as 1984.

11.4.3. The Scottish Government does not accept that a seasonal closure within the body of Loch Sween to enable a summer trawl fishery is suitable. There would be a risk of not furthering the conservation objectives.

11.4.4. The Scottish Government does not accept that there is a need to prohibit mobile gear from the whole MPA to achieve the conservation objectives. It appears that some respondents appear to have misinterpreted the SNH management options paper. Furthermore a seasonal closure within the body of Loch Sween to enable a summer trawl fishery would not provide any certainty that the conservation objectives can be furthered.

11.4.5. The use of temporal and capacity restrictions will limit the potential amount of mobile gear fishing. Along with the spatial restrictions this is considered to be a good package of measures to further the conservation objectives of all the features. Examples of the full range of biotopes within the sedimentary habitats are included in the spatial measures.

11.4.6. We intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, demersal trawl, and hand gathering throughout the MPA.
- By way of derogation mechanical dredge, demersal trawl, and hand gathering will be permitted in a specified zone. In addition a capacity restriction of 75 gross tonnes will apply to any vessel operating under this derogation. Furthermore the use of mechanical dredge will be restricted to the hours of 0700 – 2100 Monday to Friday each week.
- The existing restriction on suction dredging will be replaced and extended by these measures.

11.4.7. The measures and their ecological value are shown in appendix 11.

12. Lochs Duich, Long & Alsh MPA /SAC

12.1. Introduction

12.1.1. Lochs Duich, Long and Alsh MPA was designated to protect its burrowed mud and flame shell beds. Lochs Duich, Long and Alsh was designated as a SAC for its reefs and horse mussel beds.

12.1.2. The consultation presented one management approach that would replace the licence condition that currently protects the reefs of Lochs Duich Long & Alsh. There is also currently a mobile gear seasonal closure and a restriction on trawling where only vessels under 12m registered length using a single trawl can operate. These measures would continue to be in place.

12.2. We Asked

12.2.1. The consultation asked: 'Do you support the management approach for this protected area?'

12.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

12.3. You Said

12.3.1. In relation to whether respondents supported the preferred approach, 11 answered 'yes' and 17 answered 'no'. Nine out of the ten environment /conservation organisations that answered did not support the approach, whereas the three mobile fishing respondents that answered were all in agreement. Table 12.1 summarises the responses received.

Table 12.1: Lochs Duich, Long and Alsh MPA / SAC - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	4	3	-	126
Environment / Conservation (17)	1	9	-	7
Inshore Fisheries Group (IFG) (3)	-	-	1	2
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	3	-	-	5
Local authority (3)	-	1	-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	-	2	-	11
Static fishing (4)	2	1	1	-
Other (2)	-	-	-	2
Total (196)	**11**	**17**	**2**	**166**

12.3.2. An inshore fisheries group and a static fishing respondent commented without giving an indication of support or otherwise and these are counted in the 'other comments' column in the table above.

12.3.3. The inshore fisheries group requested a review with regard to an area of scallop ground to the north of the mouth of Kyle Rhea, commenting that closure of this area would affect smaller vessels most dependent on sheltered water. The respondent suggested that possible size restriction and 'no operation outwith daylight hours' might be appropriate for the affected area. The static fishing respondent stated here as for other areas: "we support proportionate conservation measures with minimum impact on commercial fisheries".

12.3.4. Six respondents who supported the approach and 16 of those who did not support the approach made additional comments.

12.3.5. The main theme in additional comments was that mobile gear should be prohibited throughout the year. Whilst this was the predominant theme amongst those who did not support the preferred approach, one individual who had answered 'yes' also added: "the mobile gear summer derogation should not apply".

12.3.6. Some respondents added further explanation of the reasoning behind their preference for a year round ban on mobile gear and comments included:

- to achieve the conservation objectives for the site /improve protection of marine habitats.
- to develop a better understanding of the effects of creeling on reef and burrowed mud habitats.
- to mitigate concerns about the indirect effects of trawling and dredging, such as "smothering of features due to increased suspended sediment, especially given the proximity of the western boundary of the fishing zone to the flame shell beds".
- to address perceptions of a potential bias towards the commercial fishing sector /the mobile sector.

12.3.7. An environment /conservation organisation commented: "It is vital that research, compliance, monitoring and additional funding be made available to ensure that the effect of marine activities within and outwith marine protected areas can be fully assessed". An individual respondent also observed "an area suitable for research effort over time to look at effects on habitat of creeling".

12.3.8. A local authority suggested that creel fishing effort within the site could be managed under a permit scheme, adding that this would prevent "honeypot" effects resulting from displacement of vessels, changing economics, or increased pressure. The same respondent cited awareness of possible adverse impacts on Horse Mussel beds within the SAC as a result of their removal by non -licenced divers and suggested that measures should be taken to prohibit and prevent this.

12.3.9. The three mobile fishing respondents that supported the approach commented variously on maintaining the status quo and balancing the interests of a fishery with protecting the listed features. The single environment /conservation organisation that supported the approach felt that management of non-selective fishing practices would preserve the integrity of key habitats.

12.3.10. Five respondents, comprising two individuals, two static fishing respondents and one local group answered 'yes' in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches.

12.3.11. Twelve respondents, comprising six environment /conservation organisations, a local authority, a local group, a mobile fishing respondent, an IFG, a recreation /tourism organisation and an individual answered 'no', disagreeing with the economic, social, and environmental assessments of the impact of the management approach.

12.3.12. Six respondents who had answered, together with three others who had not specified whether they agreed or otherwise, added comments at this question.

12.3.13. Three mobile fishing respondents noted that the environmental report on management measures was not available at the beginning of the public consultation.

12.3.14. Three environment /conservation respondents commented that the assessment has failed to consider the benefits that the proposed measures may bring, whether economic, social, health and/or environmental.

12.3.15. Two environment /conservation organisations noted that they agreed with the advice to remove/avoid pressure from flame shell beds and reef features but did not agree with the management advice to reduce/limit pressure on the burrowed mud features. Specifically, they commented that "any of the component species of burrowed mud, particularly fireworks anemones and tall sea pens, are highly sensitive to disturbance by mobile demersal fishing gear such as trawling". They added that a site-wide prohibition on mobile demersal gear would allow research on the environmental impacts of creel fishing on burrowed mud and Annex 1 reef features to be conducted and highlighted a lack of available research on this subject.

12.3.16. One other environment /conservation respondent reiterated concern that any use of mobile gear would pose an unacceptable level of risk to designated features.

12.3.17. A local authority commented that account had not been taken of potential positive economic benefits accruing from the complete closure of the MPA to mobile fishing gear, “which would allow for the expansion of locally based, scallop diving and recreational diving operations as well as reducing the likelihood of gear conflicts with static gear fishermen in the area”. The respondent also felt that there had not been efforts to quantify the potential for areas outwith the MPA to benefit from ecological improvements that might result from a reduction in mobile gear pressure throughout the site.

12.4. We Did

12.4.1. Comments relating to the environmental report and creel fishing have been addressed in the broad issues section.

12.4.2. The management proposal that was consulted on was designed to make the current licence condition into a permanent measure. The existing SAC boundary is unique insofar as it follows a complicated pattern around the peripheries of the 3 lochs. The most recent survey data has identified reef habitat in the basin of Loch Alsh outwith the existing SAC boundary.

12.4.3. The Scottish Government has asked Scottish Natural Heritage to prepare a case for re-designation of the SAC. The aim is to simplify the boundary and incorporate the reef habitat that currently lies outside. This will be undertaken with the view to the site being re-designated before the 2018 review of the network. In order to ensure that these habitats do not deteriorate in the intervening period we intend to implement precautionary management measures now.

12.4.4. The Scottish Government does not think that there is a risk of a creel “honeypot” at this site. The static gear fishery is already well established and currently has 6 months of exclusive use. We also do not agree that the management advice for certain components of burrowed mud should be stricter than it currently is. In any event the original proposal would have removed all pressure from the best examples of these found in Loch Duich.

12.4.5. We intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing methods - suction dredge, mechanical dredge, beam trawl, and demersal trawl - throughout the MPA / SAC.
- The removal of horse mussels will also be prohibited.
- The current licence condition will be removed after implementation of the new measures.

12.4.6. The measures and their ecological value are shown in appendix 12.

13. Luce Bay SAC

13.1. Introduction

13.1.1. Luce Bay was designated as a SAC for its large shallow inlet and bay and its dunes. The consultation presented three possible management approaches for the Luce Bay SAC:

- Approach 1 would prohibit the use of demersal trawls, mechanical dredges, or suction dredges (boat or diver operated) throughout the SAC.
- Approach 2 would be the same as Approach 1 but with a derogation to allow mechanical dredging on a seasonal basis in the inner part of the bay.
- Approach 3 would prohibit the use of demersal trawls, or suction dredges (boat or diver operated) throughout the SAC. Mechanical dredging would be managed on a zonal basis. This approach would require industry participation in a monitoring programme.

13.2. We Asked

13.2.1. The consultation asked: 'Do you support the preferred approach (number 2) for managing this protected area?' A follow up question asking about support for the alternate approaches were also asked.

13.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

13.3. You Said

13.3.1. In answer to whether respondents supported the preferred management approach eight answered 'yes' and 49 answered 'no'. Table 13.1 summarises the responses received.

13.3.2. Twenty-five of the respondents that answered this question, 24 that answered 'no' and one who answered 'yes', commented only on Luce Bay and no other areas discussed within the consultation. Twenty of the 25 were individual respondents and the remainder were three recreation /tourism, one local group and an inshore fisheries group.

13.3.3. All recreation /tourism organisations, mobile fishing respondents and local groups that answered were opposed to the proposed approach, together with the one Inshore Fisheries Group that answered. Views were more mixed amongst environment /conservation organisations, static fishing respondents and individuals, although more opposed than supported Approach 2.

Table 13.1: Luce Bay SAC - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	5	23	-	105
Environment / Conservation (17)	2	8	1	6
Inshore Fisheries Group (IFG) (3)	-	1	-	2
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	-	3	-	5
Local authority (3)	-	-	-	3
Local group (7)	-	3	1	3
Recreation / Tourism (13)	-	8	-	5
Static fishing (4)	1	3	-	-
Other (2)	-	-	-	2
Total (196)	**8**	**49**	**2**	**137**

13.3.4. Two respondents, a local group and an environment /conservation respondent, commented without giving an indication of support or otherwise and these are counted in the 'other comments' column in the table above.

13.3.5. A total of twenty-one respondents added comments, five of those who supported the approach, the two respondents who answered neither 'yes' nor 'no' and 14 who did not support Approach 2.

13.3.6. A key theme emerging from additional comments related to scallop dredging; distinct and conflicting views were expressed. Some environment /conservation and recreation /tourism organisations as well as a local group expressed serious concerns regarding Approach 2, including:

- that it will fail to meet conservation objectives, undermine site integrity and will potentially result in a breach of duties set out in the Habitats Directive.
- that mechanical dredging in the inner bay may disturb Greenland white-fronted geese.
- that Approach 2 appears to differ dramatically from the approach proposed in 2014 workshops and that some stakeholders expected to go forward with only minor changes.
- that an assessment of two potential Annex 1 habitats is required.
- that insufficient attention and weight is given to the potential value that might be realised in the recreational sector as a trade off against potential losses in mobile fishing.

13.3.7. In contrast, some individuals as well as static and mobile fishing respondents and a local group expressed concern that Approach 2 impacts on the viability of scallop fishing in the area.

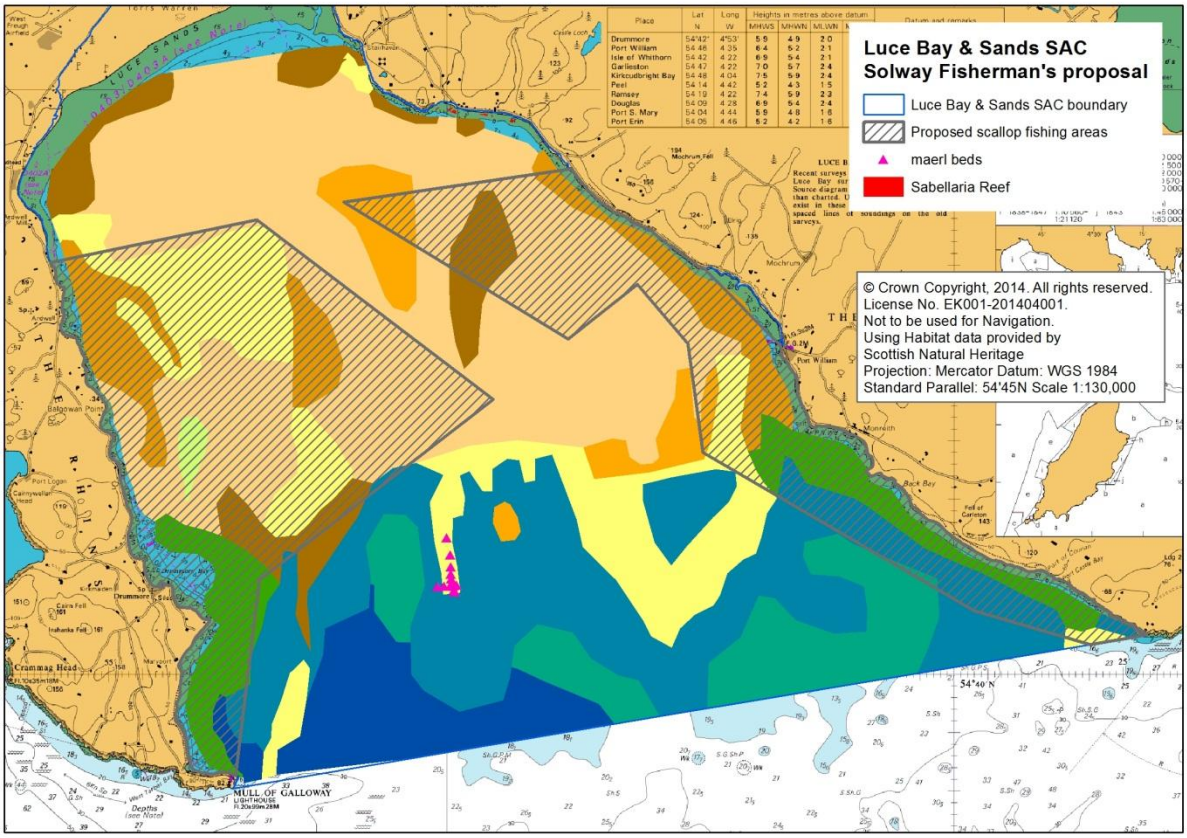
13.3.8. Those who did not support Approach 2 were asked: 'Do you support one of the other approaches?' and 39 respondents indicated that they supported Approach 1, whilst ten answered 'no' suggesting they supported none of the approaches outlined in the consultation. The environment /conservation respondent who had commented on the proposed approach, without indicating definitive support or otherwise, answered here that they preferred Approach 1.

13.3.9. The key recurring theme in additional comments made by respondents supporting Approach 1 was that all mobile activity and/or scallop dredging specifically should be totally prohibited throughout the SAC.

13.3.10. The recurring theme from those respondents that indicated they supported none of the approaches was that Approach 3 is the nearest to their preferred approach but without the imposition of a 'curfew'.

13.3.11. Five respondents referred to a recent meeting between stakeholders and Marine Scotland and a subsequent proposed alternative map (Figure 13.1) of restricted areas 'without a curfew' as a potential solution. The map referenced in these comments is reproduced overleaf for reference.

Figure 13.1: Alternate proposal from fishermen for Luce Bay SAC



13.3.12. Eight respondents, comprising four individuals, two local groups and two static fishing respondents answered ‘yes’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches ; 18 respondents from across a wide range of groupings answered ‘no’.

13.3.13. Twenty-two respondents made further comments, including four that had answered neither ‘yes’ nor ‘no’.

13.3.14. The main theme from those that commented related to economic impacts on local businesses; two different views emerged.

13.3.15. Four recreation /tourism respondents commented that declining fish stocks are resulting in diminishing visitor numbers and that loss of business from sea anglers and other tourists is adversely affecting revenue and viability. An environment /conservation respondent also commented more broadly on the potential value of the recreational sector and another noted the importance of good environmental condition of the bay for tourism.

13.3.16. Conversely, one recreation /tourism respondent, a static fishing organisation and three individuals commented on the business derived locally from expenditure by scallop fishing crews during winter months. The static fishing respondent also noted the employment created locally in scallop processing and the manufacture of fishing gear.

13.3.17. Three environment /conservation respondents expressed concerns again at this question regarding potential breach of the Habitats Directive and commented on the need for an appropriate assessment within the site.

13.3.18. Two mobile fishing respondents referred to a lack of time to consider the environmental report and reservations regarding the relevance and completeness of data provided in economic and social assessments.

13.3.19. As seen in other areas, three environment /conservation respondents commented that the assessment fails to take account of wider benefits that some of the proposals would bring.

13.4. We Did

13.4.1. Broad and conflicting views have been expressed by responders to the consultation. In light of this the Scottish Government has not reached a conclusion on what the proposed measures should be.

13.4.2. To assist the completion of those deliberations a one day stakeholder workshop will be held on 26 June 2015. Further details can be found in Appendix 13.

13.4.3. After this additional process is completed an addendum to this report will be published detailing the Scottish Government's conclusion. Luce Bay SAC has pre-existing management measures which in effect mean that there will be no scallop dredging permitted until 01 November 2015. It is therefore our current intention to ensure that any new measures are implemented on that date.

14. Noss Head MPA

14.1. Introduction

14.1.1. Noss Head was designated to protect its horse mussel beds. One management approach was presented; this would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the MPA.

14.2. We Asked

14.2.1. The consultation asked: 'Do you support the management approach for this protected area?'

14.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

14.3. You Said

14.3.1. Table 14.1 summarises the responses received.

14.3.2. Twenty-seven out of 28 respondents giving a direct answer supported the management approach. One local group answered 'no' and did not make any additional comments. One static fishing respondent simply stated "we support proportionate conservation measures with minimum impact on commercial fisheries" without answering either 'yes' or 'no' and this response is shown in the 'other comments' column in the table below.

Table 14.1: Noss Head MPA - Support for management approach

	Yes	No	Other comments	No reply
Individuals (133)	7	-	-	126
Environment / Conservation (17)	10	-	-	7
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	3	-	-	5
Local authority (3)	1	-	-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	2	-	-	11
Static fishing (4)	3	-	1	-
Other (2)	-	-	-	2
Total (196)	**27**	**1**	**1**	**167**

14.3.3. Fifteen of the respondents who answered ‘yes’ went on to add comments. The main theme in these comments was outright support for prohibiting the use of demersal trawls, mechanical dredge, or suction dredges throughout the MPA.

14.3.4. Other comments included:

- That the approach meets the conservation objectives of the MPA.
- A static fishing respondent commented that the interests of creel fishermen, commercial divers, and the communities from where they operate should be given full consideration and that allowing mobile activity would be too far in favour of the mobile sector.
- A local authority commented that that there is currently limited fishing pressure in this area and that “this sets a useful precedent for management of other areas where the approach has been to say that there is currently little fishing pressure so restrictions are not necessary”.
- An individual suggested that compliance “will be the issue”.

14.3.5. Eight respondents from the local authority, environment /conservation, mobile fishing, static fishing and individuals groups answered ‘yes’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches.

14.3.6. One environment /conservation respondent that answered in the affirmative added: “However, we are concerned about the dredge disposal site located to the south west side of the MPA and seek assurance that the boundary of the MPA has been demarcated with a sufficient buffer between the disposal site and the horse mussel bed, or that the disposal site could be moved further away. Additionally we are concerned about the impacts of the submarine power cable, which runs through the MPA and was consented prior to its designation. We seek clarification as to how any potential impacts from the cable or maintenance activities will be mitigated to protect the horse mussel bed.” Another environment /conservation respondent that answered neither ‘yes’ or ‘no’ expressed similar concerns.

14.3.7. Three environment /conservation respondents, two local groups and a mobile fishing respondent answered ‘no’. Two of the environment /conservation respondents went on to comment that the assessment has failed to consider the benefits that the proposed measures may bring to the area over time. Another suggested a need to assess use of static gear in the site and consider precautionary safeguards against any increase in effort or scale of static gear use in future.

14.3.8. The mobile fishing respondent that answered ‘no’ noted that the environmental report on management measures was not available at the beginning of the public consultation. Two other respondents in the mobile fishing group that had not answered ‘yes’ or ‘no’ also commented on lack of time to review the environmental report as well as referring to queries raised over the relevance and completeness of data provided in the economic and social assessments.

14.4. We Did

14.4.1. Please see broad issues section regarding the environmental report.

14.4.2. The Scottish Government welcomes the broad support for the proposed measures. Matters relating to marine licensing issues have been passed to the relevant authorities.

14.4.3. The current Sinclair Bay mobile gear closure, which the MPA partially overlaps, will be revoked and replaced. The new area will include the Sinclair Bay closure and the remaining part of the MPA that lies outwith.

14.4.4. We intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing gears – suction dredge, mechanical dredge, beam trawl, and demersal trawl.

14.4.5. The measures and their ecological value are shown in appendix 14.

15. Sanday SAC

15.1. Introduction

15.1.1. Sanday was designated as a SAC for its reefs and other habitats. A large population of common seals are also protected by the SAC. One management approach was presented which would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the SAC.

15.2. We Asked

15.2.1. The consultation asked: 'Do you support the management approach for this protected area?'

15.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

15.3. You Said

15.3.1. In reply to whether respondents supported the management approach, 29 respondents answered 'yes' and only one local group answered 'no' without making further comment. Table 15.1 summarises the responses received.

Table 15.1: Sanday SAC - Support for management approach

	Yes	No	Other comments	No reply
Individuals (133)	7	-	-	126
Environment / Conservation (17)	12	-	-	5
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	4	-	-	4
Local authority (3)	-	-	-	3
Local group (7)	1	1	-	5
Recreation / Tourism (13)	2	-	-	11
Static fishing (4)	3	-	1	-
Other (2)	-	-	-	2
Total (196)	**29**	**1**	**1**	**168**

15.3.2. One static fishing respondent commented without giving an indication of support or otherwise and this response is shown in the 'other comments' column in the table above. The respondent simply stated: "we support proportionate conservation measures with minimum impact on commercial fisheries".

15.3.3. The main theme in the additional comments from those answering ‘yes’ was outright support for prohibiting the use of demersal trawls, mechanical dredge, or suction dredges throughout the SAC and some specific comment that this meets the conservation objectives.

15.3.4. An environment /conservation respondent and two mobile fishing respondent both commented that creels as a potential pressure should be removed from the table of risks given that creel use has not compromised the features to date.

15.3.5. Another environment /conservation respondent commented: “We also request the Common Skate (Flapper Skate) *Dipturus intermedia* (previously *D.batis*) be included in this MPA [sic] as a key species. We have records of this IUCN critically endangered fish including egg case in situ from this area and this should be included in your outline.”

15.3.6. Seven respondents answered ‘no’ and nine respondents answered ‘yes’ in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approach.

15.3.7. Four environment /conservation respondents, a local group and two mobile fishing respondent answered ‘no’. Three of the environment /conservation respondents and one of the mobile fishing respondents went on to comment that the assessment has failed to consider the benefits that the proposed measures may bring to the area over time.

15.3.8. One of the environment /conservation respondents added: “The dependence of the north isles of Orkney on fishing as a primary source income stream is fundamental to islands resilience, self-sufficiency and food security which cannot be measured by data analysis created for larger land masses or the mainland of the UK.”

15.3.9. Another environment /conservation respondent suggested a need to assess use of static gear in the site and consider precautionary safeguards against any increase in effort or scale of static gear use in future.

15.3.10. The second mobile fishing respondent that answered ‘no’ noted that the environmental report on management measures was not available at the beginning of the public consultation. Two other respondents in the mobile fishing group that had not answered ‘yes’ or ‘no’ also commented on lack of time to review the environmental report as well as referring to queries raised over the relevance and completeness of data provided in the economic and social assessments.

15.3.11. An environment /conservation respondent that answered neither 'yes' nor 'no' commented "we support the continuation of hand diving for scallops, a successful and sustainable industry in and around Orkney, and static fishing by creeling, provided that it is operated at environmentally sustainable levels and is closely monitored for physical environmental impacts". The same respondent added "We note that harbour seals (Phoca vitulina) are also a qualifying Annex II feature of the Sanday SAC (and a Priority Marine Feature) and we suggest that this species should also be considered as part of the management for this site." The respondent suggested a need for further research to investigate the foraging range of seals around colonies or haul out sites and the impacts of static gear on seals in their foraging areas.

15.4. We Did

15.4.1. Please see broad issues section regarding the environmental report, creel fishing, and benefits.

15.4.2. The Scottish Government welcomes the support for the proposed measures. The vital importance of creel fishing to the surrounding communities has been noted.

15.4.3. It wouldn't be possible to add common skate to the designation of this site directly because they are not a qualifying interest under the EU Habitats Directive. The MPA network only has one common skate site at present and therefore in the future at least one replicate site would be desirable. Double badging an existing SAC could be an option subject to there being a suitable evidence base. In the meantime these measures will assist in their conservation.

15.4.4. This SAC also protects common seals. Rather than revisiting management of this site at a later date we intend to include a precautionary prohibition of set nets in the SAC.

15.4.5. We intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing gears – suction dredge, mechanical dredge, beam trawl, demersal trawl, and set nets – throughout the SAC.

15.4.6. The measures and their ecological value are shown in appendix 15.

16. Small Isles MPA

16.1. Introduction

16.1.1. The Small Isles MPA was designated to protect its diverse seabed habitats. This MPA is home to the only known aggregation of fan mussels in UK waters. The Small Isles MPA overlaps the Rum, Canna and Sanday SPAs designated in part for their breeding seabirds.

16.1.2. The consultation presented two possible management approaches for the Small Isles MPA. In both approaches, additional measures would be required for black guillemot, northern seafan and sponge communities, and burrowed mud. Again, for both approaches, the use of suction dredges (boat or diver operated) would be prohibited throughout the MPA and there would be a vessel capacity restriction of 150 Gross Registered Tonnage (GRT).

- Approach 1 would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) within a defined area.
- Approach 2 does the same but draws a more complex polygon to minimise the inclusion of fishing grounds. This polygon would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated).

16.2. We Asked

16.2.1. The consultation asked: 'Do you support the preferred approach (number 2) for managing this protected area?' A follow up question asking about support for the alternate approach was also asked.

16.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

16.3. You Said

16.3.1. In reply to whether respondent supported the preferred management approach, 55 said 'no', ten said 'yes' and one static fishing respondent did not specify but gave another comment. Table 16.1 summarises the responses received.

16.3.2. Thirty-five respondents, mainly from the individual and industry /transport groups, commented only on the Small Isles and Wester Ross MPAs. These respondents did not support either of the management approaches proposed for the Small Isles but, instead, supported an alternative approach (Figure 16.1 and Figure 16.2). This is described more fully below alongside comments from other respondents on the proposed management approaches.

Table 16.1: Small Isles MPA - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	2	30	-	101
Environment / Conservation (17)	1	9	-	7
Inshore Fisheries Group (IFG) (3)	1	1	-	1
Industry / Transport (6)	-	5	-	1
Mobile fishing (8)	3	3	-	2
Local authority (3)	1	1	-	1
Local group (7)	1	2	-	4
Recreation / Tourism (13)	-	2	-	11
Static fishing (4)	1	2	1	-
Other (2)	-	-	-	2
Total (196)	**10**	**55**	**1**	**130**

16.3.3. Seven of those who said 'yes', they agree with the proposed approach, commented further.

16.3.4. A respondent from the inshore fisheries group along with one from the mobile fishing group felt that this approach "is considered by the fishing industry to be the best approach to zonal management of the site to protect the features and ensure future economic returns to the fishing fleet".

16.3.5. Another two mobile fishing respondents were generally supportive of this proposed approach. One of these, however, acknowledged concerns from some groups over the boundary for restricting trawling and dredging and "supports any dialogue that helps refine the management measures in such a way that allows sustainable activity while not posing a threat to achieving the conservation objectives".

16.3.6. A local authority commented that this approach allows fishing to continue without damage to the protected features.

16.3.7. A local group felt fishing boats will need some form of positional data logging.

16.3.8. Forty-seven respondents who did not agree with the proposed management approach also commented and this included four environment /conservation respondents who said they felt Approach 2 insufficient to ensure conservation of the protected features in the area.

16.3.9. Two other environment /conservation respondents said they did not support either of the proposed approaches. One said the proposals favour the commercial sector and wanted to see a 'no take' zone across the MPA. In addition, two static fishing, one recreation /tourism and one local authority respondent wanted a ban on mechanical dredging and trawling across the MPA.

16.3.10. Another static fishing respondent, representing a large membership, voiced concern that more consideration had not been given to the promotion of sustainable fishing methods. This respondent wanted to see reinstatement of the 3-mile limit on the West coast.

Figure 16.1: Alternative proposal for trawling in the Small Isles MPA

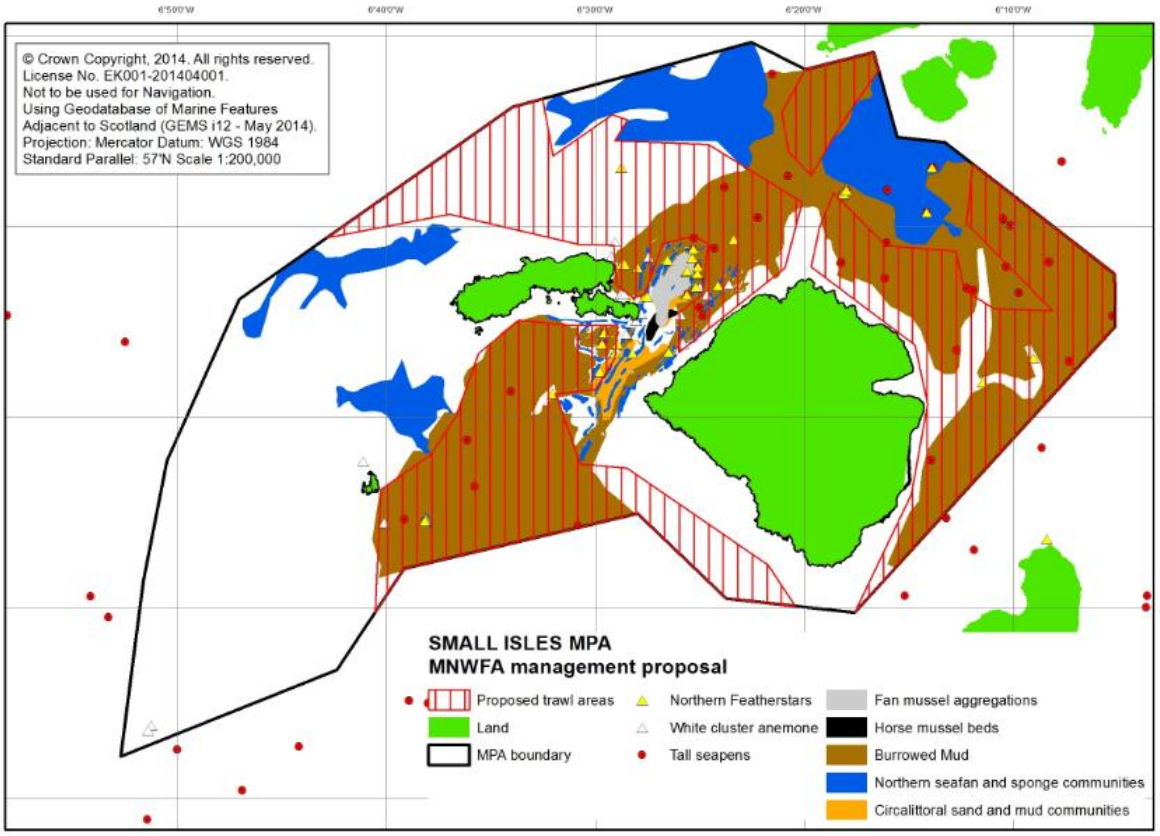
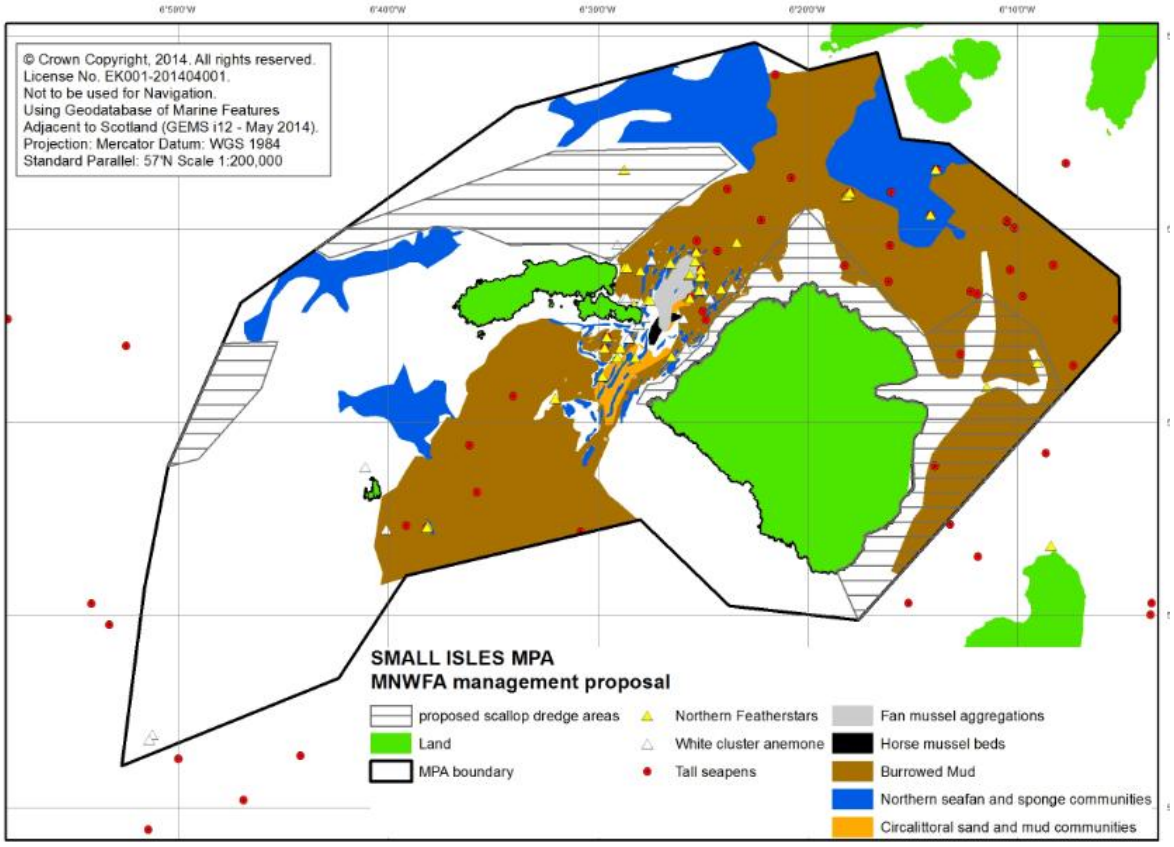


Figure 16.2: Alternative proposal for dredging in the Small Isles MPA



16.3.11. An environment /conservation respondent said they did not support either approach as these only provide protection in the Sound of Canna. This respondent said this goes against "Marine Scotland's management guidance and advice from SNH and leaving it highly likely that the conservation objectives will fail for this site".

16.3.12. Another, from the same group, wanted to see "much more ambitious protection" across the MPA, as did a recreation /tourism respondent and an individual.

16.3.13. Commenting on the need to further reduce mobile effort in the area, another individual suggested that "There is clearly a need for more research data and surveys. Rare anemone Amaranthus is near the harbour and the Northern sea fan is also in this area" and cautioned against taking a short-term view.

16.3.14. One inshore fisheries respondent said that "The proposed closure and gross tonnage limit of 150 tonnes was not proportionate and would have significant socio-economic impacts and reduce valuable catches". This view was echoed by a mobile fishing respondent.

16.3.15. The majority of those that commented at this question (including a large majority of individual and industry /transport respondents) did not support either of the approaches proposed for the MPA in the consultation document. Instead, they supported alternative measures agreed between the MNWFA and Marine Scotland on January 16th 2015, outlined in the following maps, as a compromise. These would extend the area of burrowed mud being protected while also allowing scallop and prawn fishing to continue. Many of the individuals who commented fished in the area.

16.3.16. Reasons given for support for alternative measures included:

- That the alternative proposals would both protect burrowed mud and allow for a viable fishing industry.
- That many inshore areas provide small vessels with protection from the weather and heavy swells. That small vessels have few alternatives, especially in bad weather.
- The need to encourage young people into the fishing industry by ensuring there are safe, accessible fishing areas.
- The need for a secure future for fishermen and the local economy.
- That this is an important and busy area for prawn fishing and any restrictions will cause displacement; this will cause extra fuel to be burned with the resulting carbon emissions.
- Concern that 'the goal-posts' keep changing leading to great uncertainty.
- That there has been fishing in the area for many years yet the features still remain.
- That the fishing fleet supports many local businesses.

- A query as to why the proposals include “the same GT cap for scallop boats as you would for nephrops trawlers since dredgers do not have shelter decks” (mobile fishing).
- That the regulation of creels should also be considered.

16.3.17. A respondent from the static fishing group who did not give a yes /no answer said that they support “proportionate conservation measures with minimum impact on commercial fisheries”.

16.3.18. Those who did not support the preferred option were asked: ‘Do you support the other approach?’ One individual said ‘yes’ and did not give a reason. Twenty-four respondents, from a range of respondent groups, said ‘no’ and 16 gave their reasons. Many of these reasons were similar to those already discussed at the question above. These included environment /conservation and individual respondents who said:

- That Approach 1 in particular does not offer sufficient protection. In particular, the need to extend the no-trawl zone to the north in order to protect the fan mussels as “Fan mussels are extremely rare and this site is the only known aggregation remaining in Scottish waters. It is imperative that sufficient room is given around the edges of the remaining colony to allow it to recover” (environment /conservation)
- That neither approach offers sufficient protection.
- The need for greater restrictions, or a complete ban, on mobile fishing in the area.
- That the proposals would be impossible to enforce.

16.3.19. Comments from mobile fishing respondents who did not support either proposal included:

- That the measures proposed would damage the fishing fleet.
- The importance of the fishing grounds in this area.
- The importance of the fishing industry to the local economy.
- That the fishing industry has worked hard to co-operate and engage in the consultation process and are concerned that the ‘goal posts’ keep changing.
- A request for a full enquiry into the designation of the Small Isles and for the Minister to explain, in person, “the reasons for his decisions to the fishermen affected”.
- The need to pay attention to data provided by the industry as this shows “that almost all of the tows avoided the most sensitive areas”.
- That voluntary rather than statutory measures should be considered.
- Support for an alternative approach as agreed between the MNWFA and Marine Scotland (and outlined in the figure 16.1 and 16.2).

16.3.20. Nine (including four individuals and once each form the static fishing, mobile fishing, local group, local authority and IFG groups) said they agreed with the economic, social, and environmental assessments of the impact of the management approaches.

16.3.21. Ten (including five environment /conservation respondents and one each from the static fishing, mobile fishing, local group, local authority and IFG groups) said they did not agree with the economic, social, and environmental assessments of the impact of the management approaches.

16.3.22. Four mobile fishing and one environment /conservation respondents made other comments.

16.3.23. Looking first at those who agreed with the economic, social, and environmental assessments of the impact of the management approaches, four commented further. Three, from the inshore fisheries, mobile fishing and local authority groups, restated their agreement.

16.3.24. An individual felt that while there would be a loss to trawls, the need to provide protection was “imperative”.

16.3.25. Seven, mainly from the environment /conservation group, who said they did not agree commented on their reasons and these are described below.

16.3.26. One environment /conservation respondent said: “The Northern Featherstars and tall seapens are also important features of this site and are similarly vulnerable to trawling. The objective for these should be changed to "remove/avoid" pressure from mobile gear”.

16.3.27. Another environment /conservation respondent, who did not state their agreement or disagreement, said that while they agree with the management advice to remove or avoid pressure from fan mussel aggregations, horse mussel beds, northern seafan and sponge communities and white cluster anemones, nevertheless the approaches do not go far enough. This respondent wanted to see the restricted zone extended include more of the burrowed mud habitat and an objective of recover rather than conserve in respect of the fan mussel aggregation. This respondent also advocated a precautionary approach as there may be burrowing sea anemone aggregations in the area. In addition they said that while they recognise the short and mid-term impacts on fishing boats, the restrictions “will improve the wider ecological health of our seas and provide long-term, beyond-the-site benefits for commercial fishermen”. They also wanted to see the prohibition of set nets in order to protect seabird colonies, in particular the Black Guillemot.

16.3.28. One environment /conservation respondent said that the assessment has failed to consider the benefits that the proposed measures may bring to the area over time. Another said it failed to consider other benefits such as well-being. This respondent added that the assessment had not considered the benefits of a ‘no take’ zone.

16.3.29. Another from this group wanted to see “consideration of precautionary safeguards against any future - potentially damaging - increase in effort or scale of static gear use in the site”. One other environment /conservation respondent again mentioned the need to increase the restricted zone in order to protect fan mussels.

16.3.30. A local authority commented that “The assessments seem to consider only the negative impacts of displacement of vessels rather than any positive ecosystem, or socioeconomic benefits that may arise from the designation of the site”.

16.3.31. A mobile fishing respondent said: “assessment of displacement does not consider the implications for sustainable fisheries management of the wider nephrops functional unit”.

16.3.32. Four other, from the mobile fishing group, did not state agreement or disagreement but instead made other comments, as follow.

16.3.33. Three mobile fishing respondents reserved judgement, noting that that the environmental report on management measures was not available at the beginning of the public consultation.

16.3.34. One mobile fishing respondent said they agree “with the protection of marine features as long as it is proportionate and factors in the economic viability of the local fishing communities that are under threat from MPAs”.

16.4. We Did

16.4.1. Marine Scotland welcomes the manner in which Mallaig and Northwest Fisherman’s Association (MNWFA) has engaged in this process. They have been at the forefront of providing unprecedented access to members knowledge and data. The late in the day change of nature conservation advice for northern seafan and sponge communities left everyone on the back foot.

16.4.2. The proposals made by MNWFA have been considered by both Marine Scotland and Scottish Natural Heritage. The conclusion reached was that there would be a significant risk of hindering the conservation objectives for the fan mussel aggregations, northern seafan and sponge communities, and burrowed mud. With this being the only example of fan mussels in the network, its conservation is of greater importance.

16.4.3. Therefore the Scottish Government has concluded that a greater margin needs to be left around this habitat. We also agree that the measures should prohibit set nets to protect black guillemot and the SPA seabird colonies

16.4.4. The Scottish Government does not agree with the view expressed by some respondents that the site needs to be a no take or no mobile gear MPA. Nor do we agree that there needs to be any change to conservation objectives or management advice for the protected features of this site.

16.4.5. We agree that the capacity restriction is unlikely to affect any scallop dredgers. However these vessels already have a gear restriction of 8-a-side. The use of the capacity restriction for both trawling and dredging vessels keeps things simple.

16.4.6. We intend to implement the following measures to protect all the habitat and species of the Small Isles MPA using a Marine Conservation Order under the Marine (Scotland) Act 2010;

- To prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, demersal trawl, and set nets - throughout the MPA.
- By way of derogation mechanical dredge and demersal trawl will be permitted in specified areas by vessels of less than 150 registered gross tonnes.

16.4.7. The measures and their ecological value are shown in appendix 16.

17. South Arran MPA

17.1. Introduction

17.1.1. South Arran MPA was designated to protect its diversity of animal and plant-life including maerl beds, kelp and seaweed communities and a large seagrass bed. The consultation presented three management approaches for this MPA, all of which would prohibit the use of suction dredges (boat or diver operated) throughout the MPA.

- Approach 1 would prohibit the use of demersal trawls or mechanical dredges within ½ nautical miles (NM) of land. This approach would not deliver management of burrowed mud which would require further consideration.
- Approach 2 would create scallop permit areas with a strict management scheme for mechanical dredging. In addition designated fishing areas for trawlers under 100 Gross Registered Tonnage (GRT) would be created. This would meet all the conservation requirements
- Approach 3 would have the same trawl management as Approach 2. For mechanical dredging a designated fishing area would be created which would be the subject of additional controls. This would meet all the conservation requirements. It would further the conservation objectives of the maerl beds by removing the risk of physical disturbance. It would also reduce the risk of any sedimentation effect.

17.2. We Asked

17.2.1. The consultation asked: 'Do you support the proposed high level of protection for recovery of the maerl beds, and conservation of the seagrass beds?'

17.2.2. The consultation then asked: 'Should there be a permit scheme for creel vessels to work within these recovery areas for maerl beds, and moorings adjacent to the seagrass beds?'

17.2.3. The consultation also asked: 'Do you support the preferred approach (number 3) for managing this protected area?' A follow up question asking about support for the alternate approaches was also asked.

17.2.4. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

17.3. You Said

17.3.1. Seventy-eight respondents, mainly individuals, commented only on the South Arran MPA, almost all of these single area responses were opposed to any dredging or trawling in the area; reasons given are outlined below alongside comments from other respondents on the proposed management approaches.

17.3.2. The consultation asked: 'Do you support the proposed high level of protection for recovery of the maerl beds, and conservation of the seagrass beds?'

17.3.3. Twenty-four of the 34 respondents, across respondent groups, who answered this question said that they do support the proposed high level of protection. Seven, mainly individuals and environment /conservation respondents said they did not. Three others, from the static and mobile fishing and environment /conservation groups made other comments.

17.3.4. Nineteen respondents commented further on this question. The main points made by those who answered 'yes' included:

- The sensitive nature of maerl and seagrass beds.
- The importance of these habitats, particularly as nursery habitats.
- That the habitats are listed Priority Marine Features.
- That the areas proposed for closure area similar to the areas agreed for voluntary closure.

17.3.5. Three respondents who said they did not support the proposed high level of protection commented:

- That the options are too limited; an environment /conservation respondent felt that the proposal does not allow for "proper spatial planning" and therefore a 'no take' zone should operate across the area. An individual wanted to see a ban on scallop dredging and bottom-trawling across the area.
- Another individual felt the proposals discriminate against small local fisherman and hobby fisherman and wanted to see more restrictions on commercial mobile fishing vessels.

17.3.6. Other comments included one environment /conservation respondents who did not support "the proposed creation of 'islands' of opportunity for the mobile commercial sector - such a proposal would be unworkable and can only be recognised as an attempt to maintain the status quo".

17.3.7. A mobile fishing respondent put forward alternative proposals "to help support environmental concerns and also balance with the needs of social and economic needs of the area in relation to fishing".

17.3.8. A static fishing respondent again said they support "proportionate conservation measures with minimum impact on commercial fisheries".

17.3.9. The consultation then asked: 'Should there be a permit scheme for creel vessels to work within these recovery areas for maerl beds, and moorings adjacent to the seagrass beds?'

17.3.10. Fifteen, from various respondent groups, said 'yes'; 13 (predominantly environment /conservation respondents) said no; five individuals made other comments; mainly that creeling, hand-diving and angling should be permitted.

17.3.11. Nine of those who said 'yes' commented further. The main points made were: general reiteration of support; comments that dredging must be excluded; and comments on the need for protection as creel vessels may damage maerl beds. More specific comments included:

- The need for strict criteria and monitoring for permits.
- That permits should be restricted to commercial vessels and should be affordable.
- The need for some fixed moorings in order to encourage tourism.
- The need to assess any applications for new moorings on a case by case basis; however these should not be allowed within the seagrass beds.
- That creel fishing should not be allowed within maerl beds or seagrass beds but "provision could be made for low intensity creel activity elsewhere within the recovery areas." This local authority also commented on moorings: "Rather than a permit scheme for moorings adjacent to seagrass beds, this habitat could be adequately protected through appropriate diver survey when applying for a moorings licence from Marine Scotland, as implemented in Loch Creran SAC."

17.3.12. Ten of those who said there should not be a permit scheme for creel vessels also commented. Environment /conservation respondents said they did not support the use of static fishing gear within maerl recovery areas nor moorings near seagrass beds.

17.3.13. Reasons included the slow growth and recovery of maerl the need to remove any pressure from the maerl beds to allow full recovery. One pointed out that the Approaches consultation document states 'It is proposed that no static gear be used in the areas essential to the recovery of maerl beds. However, given the long-term recovery period for this habitat is (sic) may be possible for there to be a limited creel fishery by permit within these recovery areas'. They said that "This is counterintuitive and ignores scientific advice about how best to recover this feature".

17.3.14. One of the environment /conservation respondent supported a 'no take' zone throughout the area.

17.3.15. Comments on a potential permit scheme included that there would need to be an environmental impact assessment in order to gauge the capacity for creels and that there would also need to be monitoring to ensure no illegal or 'ghost' creeling.

17.3.16. These respondents also commented on moorings with many asking for clarification of the meaning of 'adjacent'.

17.3.17. Although one environment /conservation respondent answered 'no' they said that they would support a "locally-limited permit scheme for creel vessels" but queried the location of the proposed moorings and said they could not support moorings on the edge of the seagrass beds.

17.3.18. Two mobile fishing respondents made the same comment:

> ".. the original restrictions imposed through the South Arran Marine Conservation Order 2014 were required to ensure the conservation objective for maerl beds could be achieved (and indeed were informed by Marine Scotland that this was essential). The introduction of a permit scheme to permit creel activity in these areas is very much at odds with the legal duty to ensure that fishing in a Marine Protected Area is managed so that the conservation objective (of "restore") can be achieved."

17.3.19. In relation to the approaches put forward for the South Arran MPA, respondents were asked: 'Do you support the preferred approach (number 3) for managing the protected area?' and, as can be seen in Table 17.1, 102 out of the 110 who answered said no. Seven said 'yes' and one mobile fishing respondent commented but did not specify a yes /no answer.

17.3.20. In addition, one hundred respondents said that they do not support any of the proposed management approaches for this MPA.

Table 17.1: South Arran MPA - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	5	78	-	50
Environment / Conservation (17)	-	12	-	5
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	-	4	1	3
Local authority (3)	1	-	-	2
Local group (7)	-	3	-	4
Recreation / Tourism (13)	-	3	-	10
Static fishing (4)	1	2	-	1
Other (2)	-	-	-	2
Total (196)	**7**	**102**	**1**	**86**

17.3.21. Three of those who supported the preferred approach (Approach 3) commented. One individual said they supported this approach on condition that hand creeling scallop diving angling and anchoring are allowed. They also commented that a complete ban on trawling or dredging would be a more simple solution. Another individual commented that there will need to be tight control on vessel size and gear and action taken where non-compliance is observed.

17.3.22. A local authority respondent said that while this approach gives the greatest level of protection it will also have an economic impact on mobile gear fishing. They said: “It is therefore important that the overall impact of management measures for other MPAs in the Firth of Clyde are considered cumulatively to ensure that significant detrimental economic impacts to do not occur in coastal communities which rely heavily on the fishing industry, such as Campbeltown, Carradale and Tarbert”. This respondent also commented: “The consultation document does not detail how fishing opportunities will be allocated through the permit scheme, however the Council would expect that local vessels with a history of fishing within the MPA would be given priority”.

17.3.23. Seventy-eight of those who answered ‘no’ commented only on the South Arran MPA. These respondents, mainly individuals, did not support any of the proposed approaches for this MPA and the key theme from these responses was support for a complete ban on any dredging or trawling in the area.

17.3.24. This view was shared by other respondents from the environment /conservation, recreation /tourism and static fishing groups, who also said they did not support this or any of the other proposed approaches for the South Arran MPA.

17.3.25. The main reasons given by these respondents included:

- That the proposals do not offer a high enough level of protection.
- That there should be a 3-mile limit to allow recovery and protect future stocks, and that this would be more easily enforced.
- That re-introduction of a 3-mile limit would be a small reduction in the available commercial fishing zones.
- That a 3-mile limit would lead to economic growth: respondents quoted the Scottish Government report: ‘Management Of The Scottish Inshore Fisheries; Assessing The Options For Change’ which stated that “Scotland could create more jobs and generate an excess of economic benefits over costs by imposing a 0-3 NM restriction on the use of mobile gear”.
- Comments on the Lamlash Bay No Take Zone which respondents feel proves that a ‘no take’ zone is the best approach.
- That the proposed zones, described as “patchwork” or “a jigsaw” are confusing for fishermen and will be impossible to enforce.
- That the proposals overlook the wishes of a great many respondents to a previous consultation for trawling and dredging be banned from the area.
- The need to give further consideration to approaches that promote sustainable fishing methods such as creel fishermen and commercial diving.

- Queries as to how the proposals will lead to Good Environmental Status by 2015 under the Water Framework Directive if bottom trawling on burrowed mud is allowed.
- Queries as to how the MPA will be able to contribute to the Scottish Government's plans for a revived Clyde, under the Clyde 2020 initiative, if dredging and trawling are permitted.

17.3.26. Other comments from environment /conservation respondents included the need for buffer zones as the areas proposed overlap or are close to sensitive areas. One of these respondents pointed out that "Vessels could remain outwith the protected zones but the gear they tow could easily cut across the protected zones as the vessels turn".

17.3.27. Another commented: "The South Arran MPA is another example where management approaches have used an interpretation of scientific evidence provided to develop inadequate management approaches which will fail to meet the conservation objectives, and therefore legal obligations of the MPA. Scientific evidence must inform management decisions and protect species and habitats where they occur within the MPA. This is in addition to wider seas measure for PMF species outwith the MPA. It is essential for the integrity of marine protected areas in Scotland that a scientific approach be consistently applied and that decisions about management consider the overarching reasons for the inception of marine protection in Scotland."

17.3.28. A further environment /conservation respondent submitted a detailed response relating to seagrasses and other habitats. They voiced concern that proposals will not "adequately protect marine habitats and species from damaging fishing activities, such as Seagrass Meadows (Zostera marina)". This respondent commented on the critical role seagrasses play in supporting Atlantic Cod and said that the boundaries of many management areas are too close to protected features. They wanted to see use of bottom-towed and mobile fishing gear prohibited in all protected areas.

17.3.29. Four respondents from the mobile fishing group also said that they do not support the preferred management approach. Two felt that the "boundaries for the designated scallop dredge area are more restrictive than is necessary to meet the conservation objectives". One of these respondents also commented that "On the basis of the cost summaries provided, this option represents a very significant increase in loss to the scallop sector".

17.3.30. Another from this group queried why trawlers above 100GRT are excluded from the MPA and commented that "The consultation makes no mention of exploring voluntary management options". This respondent felt that seasonal derogations could be available for nephrops trawlers in order to avowing displacement of effort. The fourth mobile fishing respondent pointed out that the area provides a fishing area in bad weather and felt that this economic aspect should be taken into account.

17.3.31. A further mobile fishing respondent, who did not give a ‘yes’ or ‘no’ response, commented that they have “worked with Marine Scotland representatives in order to reimagine possible approaches which protect the burrowed mud and allow fair access. This area offers shelter to many fishing vessels in poor weather and as such requires careful consideration”.

17.3.32. Those respondents who did not support the preferred option were asked: ‘Do you support one of the other approaches?’:

- Four (two individuals, a local group and a mobile fishing respondent) favoured Approach 1; none gave reasons for this view.
- As described at the previous question, one hundred said ‘no’ (almost all of these respondents wanted to see a complete ban on trawling and dredging in the area).

17.3.33. Four respondents from the mobile fishing group had an alternative reason for saying ‘no’.

17.3.34. Two commented that information has indicated that there is no maerl in much of the area classified as maerl beds and felt that there was “scope for amendments that allow a degree of access to said areas”. One also asked that the views of local associations are considered in relation to a permit scheme and any refinement to fisheries management measures.

17.3.35. Two others proposed an alternative approach that they described as “a fair and balanced compromise combining features of several of the suggested approaches”. This approach would apply the same rules to dredging as to trawling with the area extended to the South West of the Island. In addition, the scallop dredging boundary would be reconsidered and amended.

17.3.36. The maps submitted by these respondents are produced in Figure 17. 1 and Figure 17.2 for reference.

Figure 17. 1: Alternative proposal for dredging in the South Arran MPA

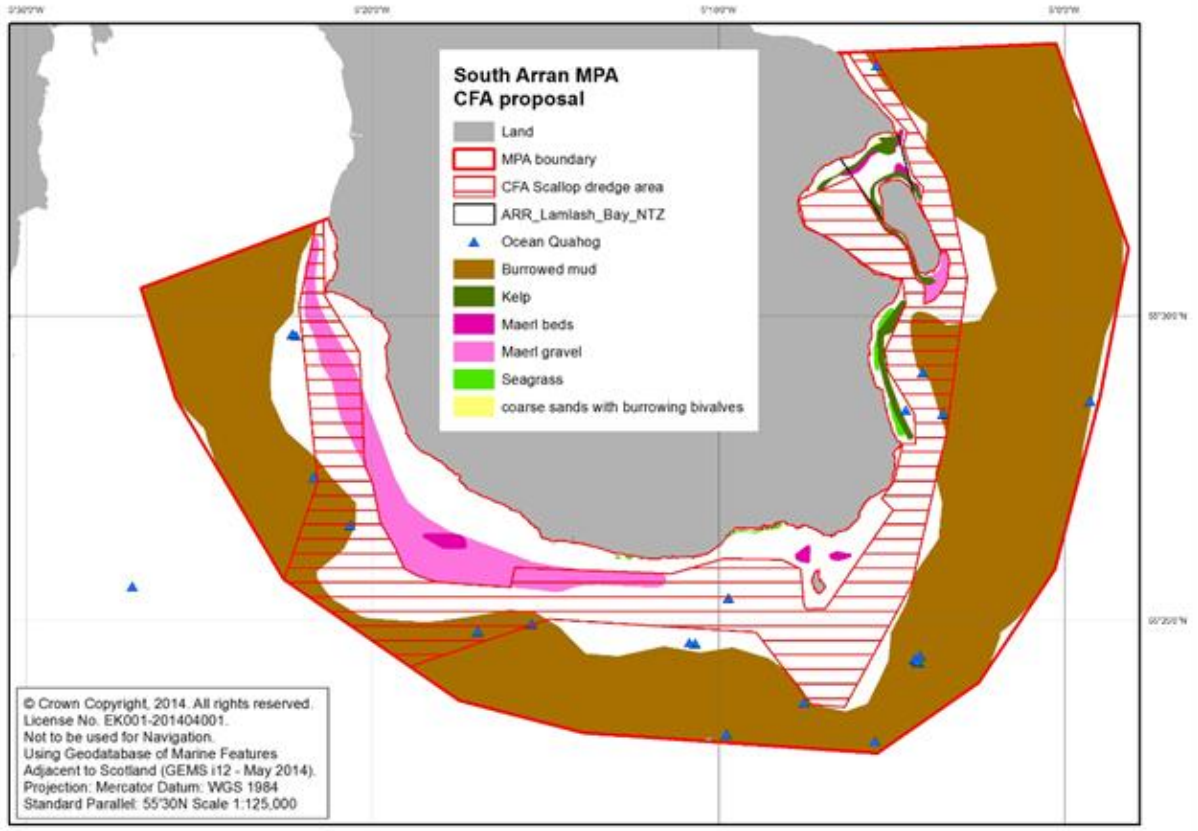
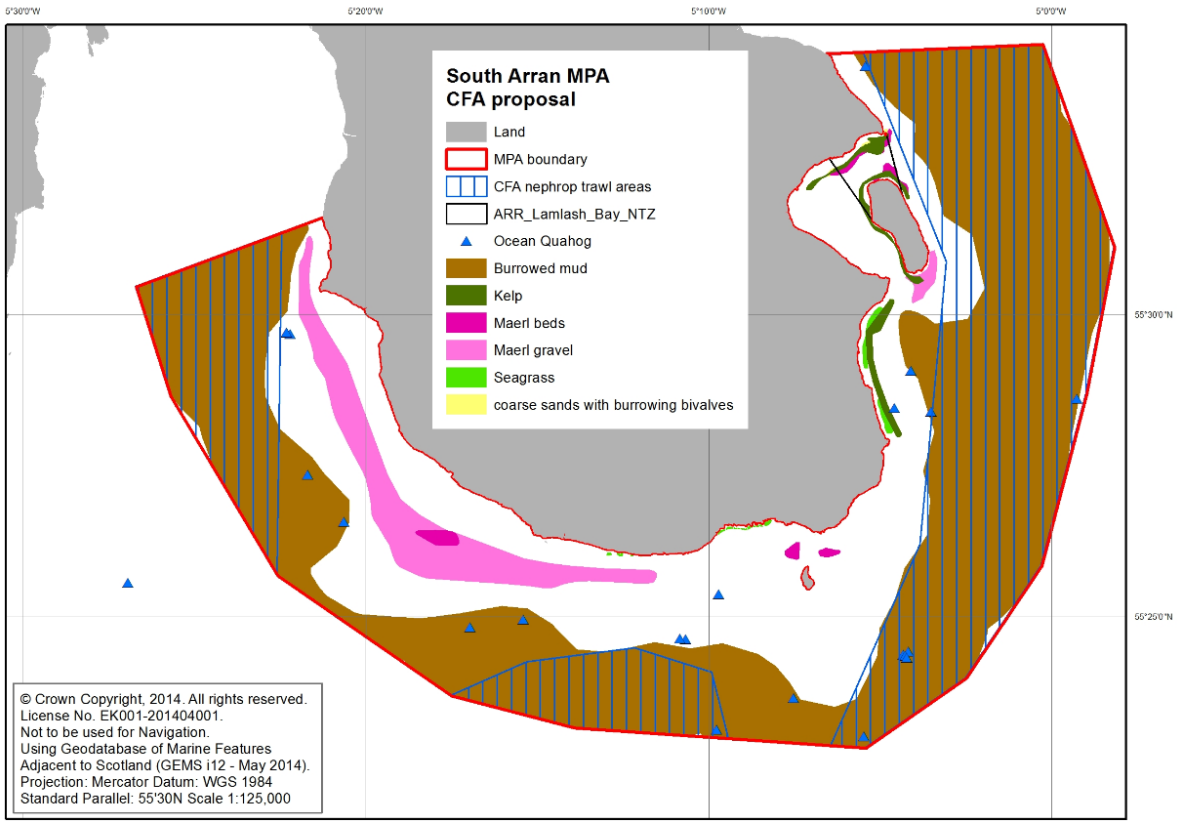


Figure 17.2: Alternative Proposal for trawling in the South Arran Area



17.3.37. In relation to permits these respondents “agreed that in open areas with addition of permits under license there should be:

- 6 month winter fishing from October to March.
- A weekend ban (as is currently the case).
- A curfew from 7am to 9pm could be imposed.
- Towbars set at 6 aside.
- 75GRT (Scallops) and 120 (Trawlers).
- Minimum landing of 105 for the first two years increased to 110 in the third year (phased).”

17.3.38. These respondents also asked that consideration be given to:

- People who have recently purchased a fishing vessel.
- Grandfather rights or 10 years fishing experience.
- The number of Irish vessels in the area.
- A limit of 120GRT for the whole Clyde area.
- A query as to whether a permit would rest with the skipper or the vessel.
- Suggestions for other conditions for permits such as stability clauses or time conditions or curfews.

17.3.39. Finally, in this section, seven respondents, including five individuals and one each from the local authority and static fishing groups, said ‘yes’ they do agree with the economic, social, and environmental assessments of the impact of the management approaches. Seventeen said ‘no’; these respondents came mainly from the environment /conservation, individual local groups and recreation /tourism groups of respondents. Seven, mostly mobile fishing, respondents made other comments.

17.3.40. Two of those who said they agree, an individual and a local authority, commented further. The individual felt that the proposed measures will, in the short term, create difficulties for those who trawl in the area. However, in the longer term the measures “may well deliver increased opportunities for low impact fisheries in the Clyde, increase in sea angling once again and a more diverse ecosystem”. The local authority commented on the need to consider the cumulative, as well as individual, economic impact of measures across all MPAs within the Clyde.

17.3.41. Thirteen of those, mainly from the environment /conservation group, who said they do not agree with the economic, social, and environmental assessments of the impact of the management approaches, also commented. The main points raised by these respondents are outlined below.

17.3.42. An environment /conservation respondent commented on the need for year-round protection for burrowing organisms saying: “The proposed measures are overly complex and enforcement will be virtually impossible for vessels without VMS”. Another, from the same group, commented that given the ecological status of the Clyde, the proposed management measures are inadequate to achieve the conservation objective of recover for maerl and conserve for all other protected features here”.

17.3.43. Others, from the environment /conservation, individual and recreation /tourism groups, felt that closing the area to mobile gear would result in economic and employment benefits to the area and the fishing industry.

17.3.44. Other environment /conservation respondents felt that the assessments have failed to consider benefits that the proposed measures may bring to the area over time and that nor have other benefits such as well-being.

17.3.45. There was a comment, from a mobile fishing respondent, that “the economics of the fleet should be paramount” while an individual said that measures restricting fishing, creeling and anchorage would have “a detrimental effect on an already fragile economy”.

17.3.46. A respondent from the recreation /tourism group commented on anchorages saying “the proposals to ban anchoring are disproportionate and inconsistent with views expressed early in the MPA project that bans would only be considered where voluntary measures were not considered appropriate”. Their reasons include: that SNH advice states seagrass beds have adequate protection; that the anchorage in question is used infrequently; that the anchorage has been in use for more than 90 years; that no case has been made linking anchoring with damage to seagrass beds; that there may be problems with implementation as “as it is unlikely that the UKHO will mark MPA boundaries or the measures for their protection (including no anchor zones) on their charts “; that a Code of Practice would be a more suitable measure.

17.3.47. Seven others, who did not specify agreement or disagreement with the economic, social, and environmental assessments of the impact of the management approaches, commented as follows:

- An environment /conservation respondent again commented on the need for a total ban on mobile gear in the area.
- Another from the same group felt that the measures proposed focussed only on the needs of the commercial sector.
- Another from this group commented that "assessment of displacement does not consider the implications for sustainable fisheries management of the wider nephrops functional unit".
- A further mobile fishing respondent said that while they agree with the environmental concerns, "at all times a fair balance with the social and economic benefits which fishing brings to the area should at all times be carefully factored".
- An individual felt that limited sea angling and creeling is only acceptable where this protects local interests.

17.4. We Did

17.4.1. Please see broad issues section regarding the environmental report, creel fishing, benefits, and the "assessing options for change" report.

17.4.2. The Scottish Government accepts that to a non-fishing audience varying zones for differing gear types may appear confusing. These have been simplified accordingly to address this.

17.4.3. The approach advocated by the Clyde Fisherman's Association has positive elements particularly in relation to effort control of the scallop fishery. However we are of the view that the spatial measures proposed would not be sufficient. There would be a significant risk of hindering the achievement of the conservation objectives for maerl beds, maerl and coarse shell gravel with burrowing sea cucumbers, and burrowed mud.

17.4.4. The environmental report of the management measures concluded that 100% displacement of all demersal trawl fishing from the site could be detrimental elsewhere. As this fishing effort is likely to remain in the Firth of Clyde then such an action could be detrimental to the Clyde 2020 initiative. Therefore in the absence of a fully prepared Clyde 2020 programme of measures the Scottish Government has concluded that a zonal management approach for trawling remains both proportionate and appropriate.

17.4.5. The use of a capacity restriction is to limit pressure overall. The spatial element reduces pressure by removing it from a proportion of habitats such as burrowed mud.

17.4.6. To minimise the risk of impact on the recovery of the maerl beds within the South Arran MPA the use of mechanical dredges will be prohibited throughout.

17.4.7. We note the concerns expressed from an economic perspective relating to fisheries. However given the resources of the wider Clyde it is anticipated that any vessels affected will still have sufficient fishing opportunities. We also see the South Arran MPA as a very small part of the nephrops functional unit. This means that there is still plenty of opportunity for nephrops quota to be taken.

17.4.8. The Scottish Government accepts the view that issues relating to moorings can be addressed through the marine licensing system. Furthermore issues relating to anchoring can be addressed through the management plan in conjunction with local stakeholders, sailing interests, and Scottish Natural Heritage.

17.4.9. As the restrictions proposed for mobile gear fisheries are more ambitious the spatial requirement for static gear restrictions has been reduced. Therefore smaller zones for no static gear are proposed. This negates the need for permit schemes which makes things easier, particularly for recreational fishers.

17.4.10. We intend to implement measures to protect all the habitat and species of the South Arran MPA using a Marine Conservation Order under the Marine (Scotland) Act 2010. These measures will;

- Prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, demersal trawl - throughout the MPA.
- By way of derogation demersal trawl will be permitted in specified areas by vessels of less than 120 registered gross tonnes.
- In addition all static gear will be prohibited from 4 small zones – three for recovery of maerl beds, and one for conservation of seagrass beds.
- There will be no change to the current level of protection in the area known as the Lamlash Bay No Take Zone. The existing measures - The Inshore Fishing (Prohibition on Fishing) (Lamlash Bay) (Scotland) Order 2008 (SSI 2008/317) – will be revoked and replaced as part of this process.

17.4.11. The measures and their ecological value are shown in appendix 17.

18. St Kilda SAC

18.1. Introduction

18.1.1. St Kilda was designated as a SAC for its reefs and submerged sea caves as well as for its sea cliffs which support the largest seabird colony in the north-east Atlantic. St Kilda is also a UNESCO World heritage Site, Special Protection Area, Site of Specific Scientific Interest, and National Nature Reserve.

18.1.2. One management approach was presented which would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the SAC.

18.2. We Asked

18.2.1. The consultation asked: 'Do you support the management approach for this protected area?

18.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

18.3. You Said

18.3.1. Twenty-nine out of the 31 respondents who commented on this area agreed with the proposed management approach. One disagreed, without giving a reason for this view. Another, from the static fishing group, did not specify an answer but instead said that they support proportionate conservation measures. A full summary of the responses can be seen in Table 18.1.

Table 18.1: St Kilda SAC - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	7	-	-	126
Environment / Conservation (17)	10	-	-	7
Inshore Fisheries Group (IFG) (3)	1	-	-	2
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	4	-	-	4
Local authority (3)	1	-	-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	2	-	-	11
Static fishing (4)	3	-	1	-
Other (2)	-	-	-	2
Total (196)	**29**	**1**	**1**	**165**

18.3.2. Fourteen of the 29 respondents who voiced support for the approach commented further. The main themes to emerge from these responses were:

- Reiteration of support for the proposed approach for a variety of reasons including the protection of species and underwater scenery (10 respondents).
- The need to monitor the impact of creel fishing (environment /conservation).
- The need to monitor the impact of management and designation (environment /conservation).
- A request for an immediate ban on set nets "to prevent the risk to diving seabirds breeding within the SPA" (environment /conservation).
- That proposals do not go far enough (static fishing).

18.3.3. Eleven respondents said 'yes' that they agreed with the economic, social, and environmental assessments of the impact of the management approach; only one of these, an individual, commented further saying St Kilda showcases good management.

18.3.4. Six respondents, mainly from the environment /conservation group, said 'no'. The main reasons given for this view were that the assessments do not take into consideration the full range of benefits that may arise from the protection of the area. One example given was that of well-being.

18.3.5. One environment /conservation respondent wanted to see creeling brought under management measures to ensure no negative effects: "A pre-emptive cap could be placed on creel activity for the site, such as limiting activity to a certain number of creels to be set and only by licensed operator/s determined following an assessment of current activity."

18.3.6. A mobile fishing respondent commented that the environmental report was not available at the beginning of the consultation, as did two other respondents from this group who did not specify a yes /no answer. These respondents also questioned the relevance and completeness of the data provided.

18.3.7. An environment /conservation respondent, who did not give a yes /no answer, wanted to see the use of static gear monitored "to ensure that this practice is conducted sustainably and without causing damage to the reef structure or its typical species".

18.4. We Did

18.4.1. Please see broad issues section regarding creel fishing.

18.4.2. The Scottish Government welcomes the broad support for the proposed measures. We have also accepted the suggestion to prohibit the use of set nets to protect the seabird colony populations.

18.4.3. We intend to implement the following measures for St Kilda SAC by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, demersal trawl, and set nets - throughout the SAC.

18.4.4. The measures and their ecological value are shown in appendix 18.

19. Treshnish Isles SAC

19.1. Introduction

19.1.1. The Treshnish Isles were designated a SAC for their colony of grey seals and its reef habitat. The consultation presented two management approaches for this SAC, both of which would prohibit the use of suction dredges (boat or diver operated) throughout the SAC.

- Approach 1 would also prohibit the use of demersal trawls or mechanical dredges throughout the SAC.
- Approach 2 would prohibit the use of demersal trawls or mechanical dredges on a zonal basis.

19.2. We Asked

19.2.1. The consultation asked: 'Do you support the preferred approach (number 1) for managing this protected area?' A follow up question asking about support for the alternate approach was also asked.

19.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

19.3. You Said

19.3.1. Many more respondents supported the preferred management approach for the site than did not. A full summary can be found in Table 19.1.

Table 19.1: Treshnish Isles SAC - Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	9	-	-	124
Environment / Conservation (17)	9	1	-	7
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	-	3	-	5
Local authority (3)	-	1	-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	2	-	-	11
Static fishing (4)	3	-	1	-
Other (2)	-	-	-	2
Total (196)	**24**	**6**	**1**	**165**

19.3.2. One static fishing respondent commented without giving an indication of support or otherwise and this response is shown in the 'other comments' column in the table above. The respondent simply stated: "we support proportionate conservation measures with minimum impact on commercial fisheries".

19.3.3. Twenty of the respondents who answered 'yes' and three of those that answered 'no' went on to add comments. The key theme in comments from those supporting the approach was that it is appropriate to prohibit the use of mobile demersal fishing gear throughout the site. Several respondents added that this provides greater protection or facilitates recovery for marine habitats and/or meets the conservation objective.

19.3.4. One static fishing respondent added that they were pleased to see 'non-damaging' methods being allowed to continue and an individual respondent commented: "there should be management measures to ensure all creelers, even those under 12m and 10m have logbooks, VMS or other technology to chart their working areas. This might be an ideal area for research into reef rehabilitation, and also research on the impact of creels in one area over time, since mobile fisheries appear to believe creels do as much abrasion damage through impact as dredges and bottom trawling".

19.3.5. An environment /conservation organisation also commented on the importance of monitoring activity going forward in order to assess the impact of the management and the designation on species, habitats and marine users.

19.3.6. Two of the mobile fishing respondents that did not support the approach commented that whilst they recognised the need for management measures in an SAC to be more restrictive than for an MPA they felt this option was not in line with stated aims that allows for MPAs to be managed using the principle of sustainable use. Both commented that sustainable activity should continue to be permitted on non-qualifying feature habitat wherever possible.

19.3.7. The third respondent that did not support the approach and added further comment was an environment /conservation organisation. This respondent commented here, as in other areas, that they found options far too limited and felt this could be viewed as a bias in favour of the commercial fishing sector. The respondent suggested a 'no take' option which they recognised as unhelpful to local non-damaging fishing methods, but felt the current plan "does not allow for proper spatial planning".

19.3.8. Those who did not support the preferred option were asked: 'Do you support the other approach?' Four respondents, comprising three mobile fishing respondents and a local authority answered 'yes' whilst the remaining two respondents (a local group and an environment /conservation organisation) answered 'no'. Four respondents that had already indicated support for the preferred approach also took the opportunity to note that they did not support the alternative.

19.3.9. Two mobile fishing respondents who supported the alternative approach commented that Approach 2 allows sustainable activity to continue while still achieving the conservation objectives for the qualifying features within the SAC. In addition, these respondents noted that Approach 2 affords additional protection to non-qualifying features, namely seagrass and maerl beds, within the SAC and believed this to be beneficial to the network as a whole.

19.3.10. A third mobile fishing respondent that supported Approach 2 caveated their support with the comment that they had "supplied scallop plotter details of the area and would urge Marine Scotland to take note of these details to see if any more of the grounds can be opened up if features are shown to be unlikely to be damaged by fishing effort".

19.3.11. The final respondent supporting Approach 2, a local authority, commented: "Approach 2 is a more flexible approach to management and seeks to allow some small areas of non-reef habitat to continue to be fished. It is however noted that the economic impact of Approach 1 is not significantly greater and that this approach is likely to be easier to implement and enforce".

19.3.12. Only one of the two respondents who did not support either the preferred approach or Approach 2 added comment at this question and they reiterated points made in their rejection of Approach 1.

19.3.13. Finally, in this section, ten respondents answered 'yes' and six respondents answered 'no' in response to whether they agreed with the economic, social, and environmental assessments of the impact of the management approaches.

19.3.14. Five of the respondents that answered 'no' added further comments at this question. One of these, an environment /conservation organisation, despite answering 'no' commented that: "The risk of direct damage to the protected reef features from heavy towed gear and to their smothering from sediment suspended by trawling and dredging, far outweighs any very marginal short-term socio-economic gain".

19.3.15. Two environment /conservation respondents commented that the assessment has failed to consider the broader benefits that the proposed measures may bring, whether economic, social, health and/or environmental.

19.3.16. Another environment /conservation organisation noted the assessment that the static gear activity is currently "moderate" and that there is no proposal to introduce a limit to the static fishery to ensure this situation is maintained. The respondent commented that they "would welcome further consideration of precautionary safeguards against any future - potentially damaging - increase in effort or scale of static gear use in the site". A second respondent in the same grouping that answered neither 'yes' nor 'no' also suggested a need to monitor the use of static gear,

19.3.17. One mobile fishing respondent noted that the environmental report was not available at the outset of the consultation.

19.4. We Did

19.4.1. Please see broad issues section regarding creel fishing and the environmental report.

19.4.2. The Scottish Government welcomes the support for the preferred approach. We remain of the view the view that this approach is the most practical solution. Implementation of a zonal approach would result in tiny zones virtually impossible to monitor from a compliance perspective.

19.4.3. This SAC also protects grey seals. Rather than revisiting management of this site at a later date we intend to include a precautionary prohibition of set nets in the SAC.

19.4.4. We intend to implement the following measures for Treshnish Isles SAC by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, demersal trawl, and set nets - throughout the SAC.

19.4.5. The measures and their ecological value are shown in appendix 19.

20. Upper Loch Fyne & Loch Goil MPA

20.1. Introduction

20.1.1. Upper Loch Fyne & Loch Goil MPA was designated to protect a range of seabed habitats and species.

20.1.2. The consultation presented two management approaches for the recovery of the flame shell bed and two approaches for the rest of the habitats. All approaches would prohibit the use of suction dredges (boat or diver operated) and there would be a vessel capacity restriction of 75 Gross Registered Tonnage (GRT). In addition:

- Approach 1a (flame shell bed) proposed that no fishing should take place or the deployment of anything onto the seabed, or removal of anything from the seabed with the recovery area based on the existing voluntary fisheries management arrangement.
- Approach 1b (flame shell bed) has the same proposals as Approach 1a but based on the potential extent of the flame shell bed.
- Approach 2a (rest of habitats) would prohibit the use of demersal trawls or mechanical dredges on a zonal basis.
- Approach 2b (rest of habitats) would create designated fishing areas for the use of demersal trawls or mechanical dredges.

20.2. We Asked

20.2.1. The consultation asked: 'Do you support the proposed high level of protection for the recovery of the flame shell bed?' If supported a further question relating to the possible permitting of activities.

20.2.2. The consultation asked: Do you support the preferred spatial approach for flameshell bed recovery (number 1a) and preferred approach for the rest of the area (number 2a) for managing this protected area? A follow up question asking about support for the alternate approaches was also asked.

20.2.3. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

20.3. You Said

20.3.1. In response to the proposed high level of protection for the recovery of the flame shell bed, 17 respondents said that they supported it, seven said they didn't' and two made other comments. This responses are summarised in Table 20.1.

Table 20.1: Upper Loch Fyne and Loch Goil MPA - Support for high level of protection for the recovery of the flame shell bed

	Yes	No	Other comments	No reply
Individuals (133)	4	2	-	127
Environment / Conservation (17)	6	2	-	9
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	3	-	1	4
Local authority (3)	1	-	-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	-	2	-	11
Static fishing (4)	2	-	1	1
Other (2)	-	-	-	2
Total (196)	**17**	**7**	**2**	**170**

20.3.2. Sixteen respondents commented further. This included nine of those who said 'yes', they support the proposed high level of protection for the recovery of the flame shell bed. The main themes to emerge from this group of respondents included:

- Three respondents reiterated their support for the proposed high level of protection.
- Two mobile fishing respondents commented that voluntary measures are already in place to restrict fishing in an agreed area.
- One local authority asked that care is taken in drawing the boundary to ensure no unnecessary impact on "the existing anchorage at Port Ann; anchorage and moorings at Otter Ferry; and the existing intertidal and subtidal oyster farm at Ballimore, by restricting activity and small scale development at locations where flameshell beds may not occur and/or are unlikely to recover". This respondent also commented that clarity is needed as to what exactly is being prohibited.
- An individual said that management measures must be enforceable and also suggested that Upper Loch Fyne be closed to all mobile gear.
- Two environment /conservation respondents commented on the importance of flame shell beds.

20.3.3. Five respondents who did not support the proposed high level of protection for the recovery of the flame shell bed commented. These respondents wanted to see greater restrictions than those proposed for this area, most said all of Loch Goil and Upper Loch Fyne should be closed to mobile fishing gear.

20.3.4. Two other respondents commented; a static fishing respondent said they "support proportionate conservation measures with minimum impact on commercial fisheries". A mobile fishing respondent supported "protection in a balanced and fair way".

20.3.5. Respondents were also asked: 'If you support a high level of protection for the flame shell bed should provision be made to permit certain activities under specific circumstances?' All seventeen who had supported the proposed high level of protection for the recovery of the flame shell bed answered, as did six others.

20.3.6. Eight respondents said 'yes' provision should be made to permit certain activities under specific circumstances. Fourteen said 'no' and one said 'yes and no'.

20.3.7. Seventeen of these respondents added comments. This included four who said provision should be made to permit certain activities under specific circumstances and one who had answered 'yes and no':

- One mobile fishing respondent reiterated their support for a high level of protection.
- One individual wanted to see mobile gear banned while another wanted to see "Creeling only in Upper Loch Fyne, with maximum number of creels, possibly local permits". A static fishing respondent said dredging or trawling should be prohibited but static fishing allowed.

20.3.8. A local authority commented again on the need to ensure the boundary does not impact on "the anchorage at Port Ann, moorings and anchorage at Otter Ferry, or the oyster farm at Ballimore". Failing this, they commented, there will be a need for provision for anchoring in designated areas. This respondent also suggested provision "to allow shellfish diving and/or low level creel fishing to occur within the wider recovery area but outwith the current extent of the flame shell bed".

20.3.9. Twelve respondents who did not support provision to permit certain activities under specific circumstances commented. The main themes from these responses were:

- That there should be no mobile fishing allowed in the area (four respondents).
- That there should be no creeling or static fishing in the area (five environment /conservation respondents).
- Another environment /conservation respondent commented that management approaches should support, not hinder, a conservation objective of 'recover'.
- Support for recreational sea angling and recreational SCUBA diving (two environment /conservation respondents).
- Two mobile fishing respondents commented that while the fishing industry has agreed voluntary measures other activity such as the laying of a submarine cable has been allowed. They asked for "a balanced and equal approach to all marine sectors" and commented "given the need for high level protection it is vitally important that all marine sectors are treated equitably".

20.3.10. Respondents were then asked: 'Do you support the preferred spatial approach (number 1a) for managing recovery of the flame shell bed?' and, as can be seen in the Table 20.2, 11 said 'yes' and 18 said 'no'. One, from the static fishing group, commented that Approach 1a was not outlined in the consultation document.

Table 20.2: Upper Loch Fyne and Loch Goil MPA – Support for preferred management approach for the flame shell bed

	Yes	No	Other comments	No reply
Individuals (133)	1	6	-	126
Environment / Conservation (17)	7	4	-	6
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	-	4	-	4
Local authority (3)	1	-	-	2
Local group (7)	1	1	-	5
Recreation / Tourism (13)	-	2	-	11
Static fishing (4)	1	1	1	1
Other (2)	-	-	-	2
Total (196)	**11**	**18**	**1**	**166**

20.3.11. Sixteen provided comments with their answers and this included seven of those who answered 'yes'; most of these respondents simply reiterated support for this option. A local authority qualified their support, asking again for "amendment to the proposed recovery area to allow use of the anchorage at Port Ann, anchorage and moorings at Otter Ferry and oyster farm at Balliemore".

20.3.12. Nine of those who said 'no' they do not support the preferred spatial approach (number 1a) for managing recovery of the flame shell bed, gave their reasons.

20.3.13. This included four mobile fishing respondents; two of whom commented that "the evidence and information available on resettlement of flame shells is based on modelling work which is unproven".

20.3.14. Two individuals and an environment /conservation respondent wanted to see mobile gear prohibited while a recreation /tourism respondent wanted a greater reduction in mobile gear.

20.3.15. Those who did not support the preferred option were asked: 'Do you support the other approach for managing recovery of the flame shell bed?' Six (from the individual and mobile fishing groups) said 'yes', 12 (mainly from the environment /conservation, individual and recreation /tourism groups) said 'no'.

20.3.16. Fifteen commented further including four who said 'yes' they support the other approach. Comments from these four respondents, all from the mobile fishing group, included:

- Reiteration of support for Approach 1b.
- Two respondents commenting that this approach is nearer to the existing voluntary agreement but saying they are "unconvinced on the case put for extending the area already agreed upon for voluntary measures and would expect that a monitoring programme should be put in place to determine if the restrictions imposed actually do enhance restoration".
- One who said "fishermen have to be aware of the new systems and that Marine Scotland should develop a mechanism to assist in informing fishermen of the changes". They also wanted to see improved legislation relating to creeling.

20.3.17. Eleven of the respondents who said 'no' they did not support the other approach also commented. Points raised by these respondents included:

- Four environment /conservation respondents said that the area is too small.
- Two environment /conservation respondents and one from the static fishing group felt the option will not allow recovery of the features.
- Four respondents felt there should be a total exclusion of bottom towed mobile gear and one wanted a greater reduction that that proposed.
- One individual felt "the 3 'green areas' should be joined to make one demersal free zone".

20.3.18. In respect of the other habitats, the consultation asked: 'Do you support the preferred approach (number 2a) for managing the rest of the protected area?' and, as can be seen in Table 20.3 most, 23 respondents, said 'no' while seven said 'yes'.

Table 20.3: Upper Loch Fyne and Loch Goil MPA – Support for preferred management approach for rest of the habitats

	Yes	No	Other comments	No reply
Individuals (133)	2	5	-	126
Environment / Conservation (17)	1	10	-	6
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	2	2	-	4
Local authority (3)	1	-	-	2
Local group (7)	-	2	-	5
Recreation / Tourism (13)	-	2	-	11
Static fishing (4)	1	2	-	1
Other (2)	-	-	-	2
Total (196)	**7**	**23**	**-**	**166**

20.3.19. Sixteen commented further and this included four of those who said 'yes' they support the preferred approach (number 2a) for managing the rest of the protected area. Two of these respondents, from the mobile fishing group, felt that this option would be simpler to manage. The others felt that this option includes the better management of mobile fishing.

20.3.20. Twelve respondents who did not support Approach 2a also commented and this included:

- Eight, many from the environment /conservation group, who wanted to see all dredging and trawling further reduced or prohibited.
- Two mobile fishing respondents said this approach would affect fishing patterns or activities.
- Two simply said they did not support Approach 2a.
- One individual felt the areas should be joined rather than separate.
- One environment /conservation respondents commented on the need for monitoring to understand the impact of measures on the protected features and on the need for "research, compliance, monitoring and additional funding be made available to ensure that the effect of marine activities within and outwith marine protected areas can be fully assessed". They added "as well as considering the high level of protection of these areas, the three pillar approach of species, sites and wider-seas measures must be applied throughout".

20.3.21. Those who did not support the preferred option were asked: 'Do you support the other approach for managing the rest of the protected area?' Five said 'yes' while 18 (mainly from the environment /conservation and individuals groups, said 'no'.

20.3.22. Four of those who said 'yes' commented further. Two of these respondents wanted mobile gear prohibited with no derogation.

20.3.23. Two, from the mobile fishing group, pointed out "that this area is heavily fished currently and has been for the last 70 years, and if quahogs are still present Marine Scotland should consider that the fishing can't be harming them as they are still there". They also felt that this option could affect semi pelagic white fishing in the three mile limit and that it will cause displacement that will affect adjacent areas. One noted that some data for upper Loch Fyne is not accurate.

20.3.24. Twelve respondents who said 'no' they did not support the other approach commented:

- Seven wanted to see mobile gear completely prohibited.
- Three felt the proposal too complicated
- Two simply said they did not support Approach 2b.

20.3.25. Two mobile fishing respondents who said 'yes' to Approach 2a were concerned that the other approach is overcomplicated and unnecessary.

20.3.26. Finally, in this section, eight respondents, mainly individuals, said 'yes' that they agreed with the economic, social, and environmental assessments of the impact of the management approaches. Two commented further; a local authority asked that "the economic impact of management measures for the three MPA proposals within the Firth of Clyde are considered cumulatively by Marine Scotland as well as individually". An individual commented: "Loch Fyne is suffering from not only trawling but an immense number of finfish farms". They also said there will need to be clear management plans and objectives in place for creeling licences.

20.3.27. Nine respondents, mainly from the environment /conservation group, said 'no' and five of these respondents added their reasons:

20.3.28. One commented that the assessments do not take into account future cost benefits while one said they do not take into account the well-being benefits that may accrue. There was also a comment that the assessments have not considered the full range of benefits that will occur. These respondents were all from the environment /conservation group.

20.3.29. Others, from the same group, felt that the measures proposed are not sufficient "to protect the burrowed mud or associated features"; these respondents wanted a more precautionary approach.

20.3.30. Six respondents made other comments; these were mainly from the mobile fishing and environment /conservation groups:

- A recreation/tourism respondents commented that the flame shell beds are not in an area that would be used for anchorage as there are more appropriate anchorages in the area.
- Two respondents from the mobile fishing group did not specify an answer, instead reserving judgement as they have not had time to evaluate the Environmental Report that was not available at the start of the consultation. Another from this group commented: “a fair balance with the social and economic benefits which fishing brings to the area should at all times be carefully factored”.
- Two environment /conversation respondents commented that more protection is needed in this area and that this would bring additional benefits.

20.4. We Did

20.4.1. Please see broad issues section regarding creel fishing and the environmental report.

20.4.2. The Scottish Government accepts the view that non-fishing issues be addressed through the marine licensing system where appropriate. Furthermore issues relating to anchoring can be addressed through the management plan in conjunction with local stakeholders, sailing interests, and Scottish Natural Heritage. This combination will address non-fishing issues in relation to recovery of the flame shell bed.

20.4.3. On fisheries issues the Scottish Government has noted the general lack of support for any of the management approaches. For some stakeholders this is from an environmental perspective and for other it is economic issues.

20.4.4. The Scottish Government has concluded that a simplified management solution is appropriate. This retains limited access to both lochs for demersal trawling. This is a balanced approach that furthers the conservation objectives without unnecessary potential short term socio-economic impact.

20.4.5. To minimise the risk of impact on the recovery of the flame shell beds within the Upper Loch Fyne and Loch Goil MPA the use of mechanical dredges will be prohibited throughout.

20.4.6. We intend to implement the following measures for Upper Loch Fyne & Loch Goil MPA by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, and demersal trawl - throughout the MPA.
- By way of derogation demersal trawl will be permitted in specified areas by vessels of less than 75 registered gross tonnes.
- In addition all static gear would be prohibited in the area identified for recovery of the flame shell bed.

20.4.7. The measures and their ecological value are shown in appendix 20.

21. Wester Ross MPA

21.1. Introduction

21.1.1. Wester Ross MPA was designated to protect a wide range of seabed habitats and geodiversity. The consultation presented two management approaches for this MPA, both of which would prohibit the use of suction dredges (boat or diver operated) and introduce a vessel capacity restriction of 150 Gross Registered Tonnage (GRT). We also stated that additional measures would be required for burrowed mud and circalittoral muddy sand communities under approach 1.

- Approach 1 would deliver zonal management for the protection of the maerl beds and flame shell beds through prohibiting the use of demersal trawls or mechanical dredges.
- Approach 2 would prohibit the use of demersal trawls or mechanical dredges on a zonal basis for all habitats.

21.2. We Asked

21.2.1. The consultation asked: 'Do you support the preferred approach (number 2) for managing this protected area?' A follow up question asking about support for the alternate approach was also asked.

21.2.2. The consultation asked: 'Should static gear fisheries be restricted in the areas essential to the recovery of maerl beds and flame shell beds?' and 'Under either approach should the Summer Isles area be zoned by depth to enable scallop dredging to continue?'

21.2.3. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

21.3. You Said

21.3.1. In response to whether respondents supported the preferred management approach 11 respondent answered 'yes' and 29 answered 'no'. All mobile fishing respondents and local authorities that answered were opposed to the preferred approach, whilst opinions were mixed across other respondent groupings. Table 21.1 summarises all responses received.

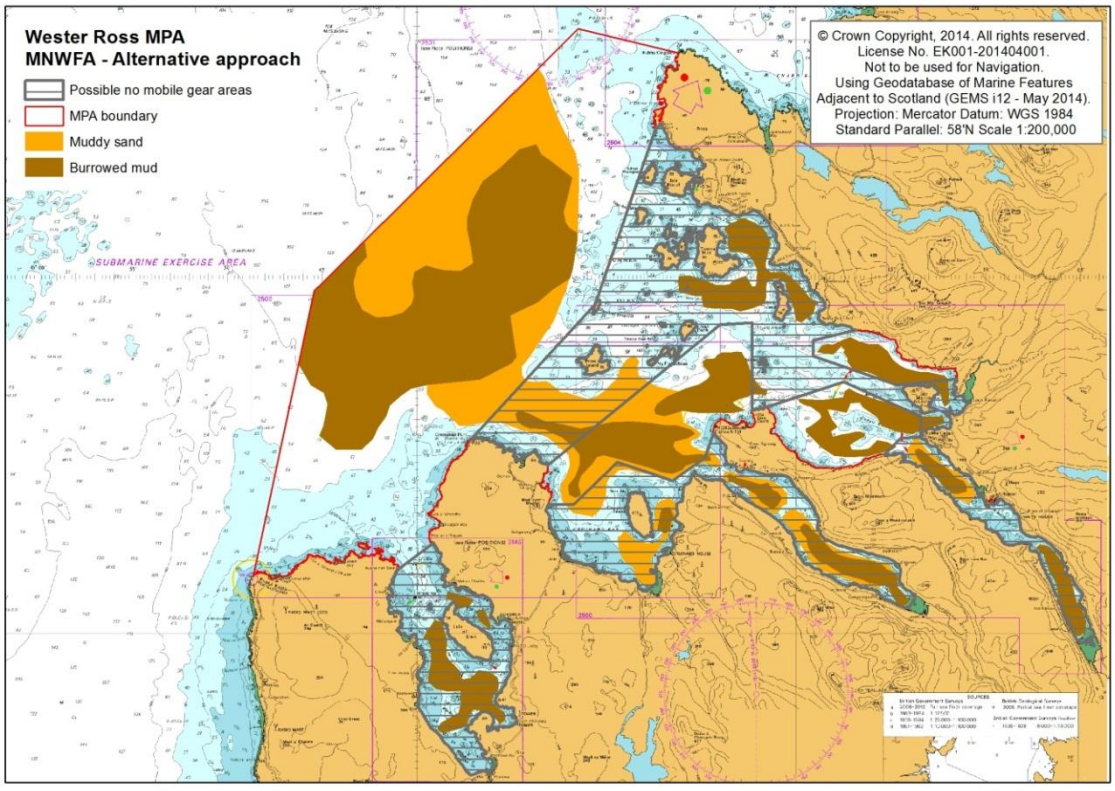
21.3.2. Six of the respondents that answered this question, five that answered 'no' and one that answered 'yes', commented only on the Small Isles and Wester Ross and no other areas discussed within the consultation. Four of the six were individual respondents and the other two were environment /conservation organisations.

Table 21.1: Wester Ross MPA – Support for preferred management approach

	Yes	No	Other comments	No reply
Individuals (133)	4	7	22	100
Environment / Conservation (17)	3	10	-	4
Inshore Fisheries Group (IFG) (3)	1	1	-	1
Industry / Transport (6)	-	-	4	2
Mobile fishing (8)	-	5	-	3
Local authority (3)	-	2	-	1
Local group (7)	1	1	1	4
Recreation / Tourism (13)	1	1	-	11
Static fishing (4)	1	2	1	-
Other (2)	-	-	-	2
Total (196)	**11**	**29**	**28**	**128**

21.3.3. Twenty-eight respondents commented without giving an indication of support or otherwise and these are counted in the 'other comments' column in the table above. Twenty-seven of these 28 respondents commented only on the Small Isles and Wester Ross and no other areas discussed within the consultation. Twenty-four of them expressed support for a possible agreement on the area that had been made between MNWFA and Marine Scotland on January 30th 2015. The map referenced in these comments is reproduced in Figure 21.1 for reference.

Figure 21.1: Alternative management proposal for the Wester Ross MPA



21.3.4. Six respondents that supported Approach 2 as presented in the consultation added comments. One of these, an inshore fisheries group, noted: “any further reduction in mobile effort within the proposed MPA would cause serious problems for smaller mobile vessels in inclement weather”. A mobile fishing and an individual respondent that answered ‘no’ also expressed concerns regarding safety linked to closure to mobile vessels, whilst nevertheless expressing slightly reluctant acceptance of the idea of bringing in the extended burrowed mud grounds of Wester Ross.

21.3.5. The main theme from those that answered ‘yes’ was that a more precautionary approach with zonal management applied to all habitats is preferable.

21.3.6. Some environment /conservation organisations that answered ‘yes’ noted that further areas of maerl had been located in a recent survey and the respondents commented that they would expect the controlled zones to be extended to include these. Suggestions were included for these revisions. In addition, several respondents that answered ‘no’, particularly environment /conservation organisations, also commented on newly located areas of maerl as a reason for not supporting Approach 2 as described in the consultation.

21.3.7. Another theme in comments, from those that did not support Approach 2 as detailed, related to the need to balance the interests and socio-economic impacts of commercial fishing with environmental needs. In contrast, a small number of respondents favoured prohibition of all dredging and trawling throughout the MPA.

21.3.8. Two mobile fishing respondents commented that the proposal to implement a capacity restriction of 150GRT across the MPA is unnecessary and imposes a restriction on vessels that currently operate on the western boundary of the MPA.

21.3.9. Those who did not support the preferred option were asked: ‘Do you support the other approach?’ and five respondents answered ‘yes’ whilst 23 respondents answered ‘no’. Those that answered ‘no’ and added comments predominantly indicated that they felt the approach offered inadequate protection or that they advocated total exclusion of dredging and trawling.

21.3.10. The respondents that supported Approach 1 comprised two mobile fishing respondents, an inshore fisheries group, a local authority and an individual. Three of these respondents added comment here that a depth zoning approach should be used under this approach.

21.3.11. Respondents were also asked: ‘Should static gear fisheries be restricted in the areas essential to the recovery of maerl beds and flame shell beds?’ Twenty respondents answered ‘yes’ and seven respondents answered ‘no’.

21.3.12. Only three of those who answered ‘no’ made further comment. A static fishing organisation commented that this would not be necessary if dredging and trawling were prohibited and an individual commented: “static gear protects areas from damage such as bottom trawling”. Another individual respondent commented that static gear is less impactful on the habitats but added: “gear conflict with mobiles may well cause damage by hauling the creels along the bed/reef or flame shell beds”. The respondent felt this emphasised the need for mobile gear to be zoned away from these features.

21.3.13. Three main themes emerged in comments from those that answered ‘yes’ that static gear fisheries should be restricted in the areas essential to the recovery of maerl beds and flame shell beds.

21.3.14. The first, most commonly evident in responses from environment /conservation organisations, was that this would give the best likelihood of the long-term recovery of these features the MPA.

21.3.15. The second theme was that more research should be undertaken and / or made available regarding the impact of static gear on these features; this could then inform decisions regarding restrictions.

21.3.16. The third theme, sometimes directly linked to the second, was that an appropriate permit scheme should be developed in order to balance the interests of the static fishing sector and the recovery of these features.

21.3.17. A mobile fishing respondent commented: “there must always be a balanced and equal approach to all marine sectors when determining appropriate management measures”.

21.3.18. The consultation then asked: ‘Under either approach should the Summer Isles area be zoned by depth to enable scallop dredging to continue?’ Twenty-four respondents, predominantly individuals, answered ‘yes’ and 20 respondents answered ‘no’.

21.3.19. Twenty-two of those that answered ‘yes’ added comments, mostly indicating that this seemed to represent an acceptable /agreeable proposal and /or would keep scallop fishing viable in the area. Three individual respondents also felt that a total ban in this area would result in displacement of activity to other locations.

21.3.20. Three mobile fishing respondents and an inshore fisheries group commented that zoning by depth would ensure no impact on protected features; two commented further on the use of underwater cameras in this respect.

21.3.21. The twenty respondents that answered ‘no’ comprised seven environment /conservation organisations, six individuals, two local groups, two static fishing organisations, a local authority and two recreation /tourism respondents. The major theme from those that commented was that there should be no scallop dredging in the area.

21.3.22. Three respondents commented that depth zoning is difficult to enforce and /or that they believe there are examples of instances where scallop dredgers have not adhered to depth limitations.

21.3.23. Finally, in this section, respondents were asked: 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?' Twelve answered 'yes' and ten answered 'no'.

21.3.24. Only two of the respondents that answered 'yes' added comments. A recreation / tourism organisation commented that the area is popular with recreational divers and expressed the view that protection of the marine environment is essential to the continued attraction of divers and the economic benefits they bring to the region. An individual commented: "some valuable inshore fishery data from local, small scale fishermen in under 14m or even under 10m vessels would have added extra weight of evidence for the local communities".

21.3.25. Eight of the respondents that answered 'no' commented. The key theme in these comments was that greater emphasis is placed on costs to the mobile fishing sector than on potential economic and social benefits that might be accrued as a result of restricting mobile fishing.

21.3.26. One respondent that answered 'no' commented that the environmental report was not available at the start of the consultation and another that they support an approach submitted by Scottish environment LINK that takes account of additional records of listed features.

21.3.27. Five respondents made comments without giving a definitive 'yes' or 'no' answer. Their comments included:

- A perception that the opinions of creelers and scallop divers have at times been supressed in the interests of other fishing sectors.
- A view that recreational anchoring "on the east side of Tanera More, Acairsaid Driseach on the west side, and places between Tanera Beg and Eilean Fada Mor" would not compromise the conservation objectives of the MPA .
- References to a lack of time to consider the environmental report and reservations regarding the relevance and completeness of data provided in economic and social assessments.
- A suggestion that the proposed management approach be revised to include more of the known occurrences of tall sea pens and sea pens.

21.4. We Did

21.4.1. Please see broad issues section regarding creel fishing, benefits, and the environmental report.

21.4.2. The Scottish Government welcomes the discovery of additional maerl beds within the MPA. We also note the request that potential maerl habitat is protected on a precautionary basis. These have been taken into account in the proposed measures.

21.4.3. The proposal from the Mallaig & Northwest Fisherman's Association is also welcomed. This provides the foundation of the revised Scottish Government demersal trawlmanagement proposal.

21.4.4. A significant number of stakeholders supported depth zonation of the scallop fishery at the Summer Isles. However the Scottish Government is of the view that in order to stimulate recovery of the maerl bed habitat there needs to be a considerable margin around them. We recognise the effort the fishing industry put into agreeing voluntary measures. These were designed to prevent any physical disturbance of the maerl beds. They were not designed to protect them from secondary effects such as sedimentation which can also have a profound effect. Therefore in order to recover the maerl bed habitat there will be no zonation by depth proposed at the Summer Isles.

21.4.5. To minimise the risk of impact on the recovery of the flame shell beds and maerl beds within the Wester Ross MPA the use of mechanical dredges will be prohibited throughout.

21.4.6. It is noted that there is some support for creel restrictions for recovery of maerl beds and flame shell beds. Whilst we haven't as yet proposed any measures, Marine Scotland would like to work with local stakeholders to consider what they should be.

21.4.7. The Scottish Government agrees that known recreational anchorages pose no threat to achieving the conservation objectives. Promoting the use of these known anchorages will be a feature of the management plan.

21.4.8. We propose to implement the following measures to protect all the habitat and species of the Wester Ross MPA using a Marine Conservation Order under the Marine (Scotland) Act 2010;

- Prohibit the use of the following fishing methods – suction dredge, mechanical dredge, beam trawl, and demersal trawl - throughout the MPA.
- By way of derogation demersal trawl will be permitted in specified areas by vessels of less than 150 registered gross tonnes.
- The existing seasonal mobile gear closure for Little Loch Broom and Gruinard Bay will be revoked as part of this process.

21.4.9. The measures and their ecological value are shown in appendix 21.

22. Wyre & Rousay Sounds MPA

22.1. Introduction

22.1.1. Wyre and Rousay Sounds MPA was designated to protect its maerl beds and kelp and seaweed communities.

22.1.2. One management approach was presented; this would prohibit the use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout the MPA.

22.2. We Asked

22.2.1. The consultation asked: 'Do you support the management approach for this protected area?'

22.2.2. The consultation also asked 'Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?'

22.3. You Said

22.3.1. Almost all of the respondents who commented on this area said that they supported the management approach (25 out of 27). A full breakdown of the responses can be seen in Table 22.1.

Table 22.1: Wyre and Rousay Sounds MPA – Support for management approach

	Yes	No	Other comments	No reply
Individuals (133)	5	-	-	128
Environment / Conservation (17)	11	-	-	6
Inshore Fisheries Group (IFG) (3)	-	-	-	3
Industry / Transport (6)	-	-	-	6
Mobile fishing (8)	4	-	-	4
Local authority (3)	-	-	-	3
Local group (7)	1	1	-	5
Recreation / Tourism (13)	1	-	-	12
Static fishing (4)	3	-	1	-
Other (2)	-	-	-	2
Total (196)	**25**	**1**	**1**	**169**

22.3.2. Sixteen respondents commented further:

- Twelve respondents reiterated their support for the approach in this MPA or for prohibiting demersal trawl, mechanical and suction dredging in all MPAs.
- Four voiced support for the approach purely due to the fact that demersal trawl, mechanical and suction dredging are not, in any case, used in the area.

22.3.3. Other comments from these respondents included:

- A request for common skate to be "included in this MPA as a key species" (environment /conservation).
- The need for further research into the impact from any salmon farm developments close to the site. This respondent, from the mobile fishing group, added: "We believe that development adjacent to the MPA and affecting the connectivity of the biological ecosystem outwith the MPA should be included as a management measure and we would highlight the recent planning application granting a salmon farm site close to the boundary of the MPA at Stromness Taing as an example. This area is a highly productive juvenile commercial scallop site but is unprotected. Our view is that a management 'buffer' zone at this site should be established to further protect the communities which will enjoy the protection of the maerl."
- An environment /conservation respondents commented on the need for ongoing monitoring to determine the impact that the designation and management has had on the area.
- A request, from a mobile fishing organisation, for weight to be given to any comments from fishermen working in the area.

22.3.4. Only one, a local group, said they did not support the approach; this respondent felt that management should be in the hands of the local community. One other respondent, from the static fishing group, again said they support "proportionate conservation measures with minimum impact on commercial fisheries" without giving an indication as to whether they consider this proposed approach to be proportionate.

22.3.5. Finally, in this section seven respondents, from the individual, environment /conservation, static fishing and local groups, said 'yes' that they agreed with the economic, social, and environmental assessments of the impact of the management approach. Only one commented; an environment /conservation respondent said that they support the continuation of the use of static fishing gear provided it is subject to an environmental impact assessment and is also then closely monitored; should it become apparent that damage is being caused they would wish to see static gear prohibited.

22.3.6. Six, including four from the environment /conservation group along with a mobile fishing and local group respondent, said 'no'. Five of these respondents commented further. The main theme to emerge was that respondents felt the assessments do not take into account the economic, social, health and/or environmental benefits that will accrue over time; in particular those that are not easily converted into measurable data.

22.3.7. One environment /conservation respondent was concerned that the assessment does not include information on the current levels of static fishing in the area. They felt that safeguards to ensure these methods do not cause any future damage should be considered. Another environment /conservation respondent who did not specify a yes /no response made similar comments.

22.3.8. Three respondents from the mobile fishing group did not specify an answer, instead reserving judgement as they have not had time to evaluate the Environmental Report which was not available at the start of the consultation. In addition, there were queries over the relevance and completeness of some data included in the social and economic assessments.

22.4. We Did

22.4.1. Please see broad issues section regarding the environmental report, creel fishing, and benefits.

22.4.2. The Scottish Government welcomes the support for the proposed measures. The vital importance of creel fishing to the surrounding communities has been noted. We do not agree that there is any need for restrictions on creel activity in this MPA. The excellent condition of the maerl beds are testament to the sustainable fishing undertaken by the local communities.

22.4.3. Concerns about aquaculture development in the vicinity of the MPA have been passed to the relevant authorities.

22.4.4. It may be possible to add common skate to the designation at a later date The MPA network only has one common skate site at present and therefore in the future a replicate would be desirable. Re-designating an existing MPA could be an option subject to their being a suitable evidence base. In the meantime these measures will assist in their conservation.

22.4.5. We intend to implement the following measures by an Order under the Inshore Fishing (Scotland) Act 1984;

- To prohibit the use of the following fishing gears – suction dredge, mechanical dredge, beam trawl, and demersal trawl – throughout the MPA.

22.4.6. The measures and their ecological value are shown in appendix 22.

23. Other Comments

23.1. General Comments

23.1.1. You Said

23.1.1.1. Several respondents included comments not directly related to the consultation questions. While these mainly related to background information on the organisation or individual, other points from these responses included specific issues or issues that apply to all of the areas under consultation.

23.1.1.2. Many respondents also restated or summarised points made at the various questions through the consultation.

23.1.1.3. Comments from environment / conservation respondents included:

- Support for MPAs.
- Disappointment with measures proposed as these are seen as being insufficient to provide the protection needed in the MPAs and SACs.
- That the proposals are not fit for purpose.
- The need for re-appraisal of some objectives and also of some protected features in order to ensure their conservation.
- Concern that proposals will not deliver site integrity.
- Support for environmentally sustainable fisheries.
- Support for precautionary approaches.
- Support for ecosystem approaches.
- The need to ensure an ecologically-coherent network.
- The need to consider cumulative impacts.
- The need for strategic planning and monitoring.
- That management approaches must be guided by scientific evidence and advice.
- The need for up to date, accurate data and economic, impact, cumulative and appropriate assessments.
- That 30% of Scottish seas should be ‘no take’ zones.
- That there is public support, especially on Arran, for the prohibition of dredging and bottom trawling within a 3-mile limit.
- The need for protection for particular species and habitats, particularly maerl, seagrass and the Common Skate.

23.1.1.4. A static fishing respondent commented that they had been excluded from workshops. This respondent felt that the proposed measures did not go far enough in order to “facilitate recovery of our inshore waters and the special features contained therein. The ‘Band Aid’ approach we believe is unlikely to produce any meaningful recovery of the marine environment”. They also wanted to see re-instatement of the 3 mile limit on the West coast.

23.1.1.5. An inshore fisheries group wanted to see the review period for fisheries management measures set at no more than three years.

23.1.1.6. Comments from individuals included concern over the consultation process, described variously as: complicated; difficult to engage with; designed to discourage engagement; confusing; containing too many documents and that these were difficult to access and to interpret; badly publicised; forms that were not user-friendly; and badly conducted meetings. In addition there was concern that SNH had not attended one key meeting.

23.1.1.7. One individual outlined concerns over Atlantic salmon farms in some of the areas. This respondent saw these as negatively affecting the marine environment and questioned why they would be allowed near protected areas.

23.1.1.8. A public sector organisation said that any measures "must be underpinned by sound science and evidence to ensure that appropriate measures provide a clear environmental benefit" and asked that any measures required of them be "clearly evidenced and included in a future regulatory investment programme".

23.1.1.9. A recreation /tourism association commented:

- on the contribution made by boat owners to the economy;
- on the need to ensure freedom to anchor is not unduly limited;
- that numbers of leisure craft using anchorages is small and is, mainly, seasonally restricted;
- that some have no choice but to anchor due to weather and tides; and
- that the 'footprint' of cruising yachts is extremely light.

23.1.1.10. Several respondents thanked Marine Scotland for the chance to participate in the consultation and others looked forward to on-going engagement with Marine Scotland over the proposed management measures.

23.1.2. We Did

23.1.2.1. Marine Scotland have noted the concerns raised regarding the consultation process, and that most of these were generated from a single location.

23.1.2.2. It is unfortunate that no-one used the "comments and complaints" process set out in the Overview document. Had this been done we could have made changes during the consultation.

23.1.2.3. We acknowledge that the official publications should have had links between them, and back to the consultation hub page to make navigation for stakeholders easier.

23.1.2.4. For another consultation we have been trialling the use of “Citizen Space” which has been designed to improve the responder experience. The second management consultation will use this new platform and the normal routes in tandem. This gives responders a greater choice in how to respond. We will also publish the second consultation in a singular document.

23.1.2.5. The consultation public drop-in sessions were held at 14 locations throughout Scotland. The purpose of these sessions was to raise awareness of the public consultation and the proposed management measures. These sessions were advertised locally via radio and newspaper adverts and nationally in the ‘Fishing News’ paper.

23.1.2.6. Marine Scotland would welcome stakeholder views on how to improve public awareness of future consultation and related events.

23.1.2.7. The meeting that Scottish Natural Heritage did not attend was held in Mallaig on 16 January 2015. The weather was adverse and they were unable to travel from Perth and Inverness because of the conditions. These circumstances were outwith their control. Although Marine Scotland did make it we had a 7 hour journey home which is a good indication of the adverse conditions.

Appendix 1: Consultation Questions

2014 Consultation on the management of inshore Special Areas of Conservation and Marine Protected Areas

Consultation Questions

East Mingulay SAC

1. Do you support the preferred approach (number 1) for managing this protected area?

2. If you answered no to question 1, do you support the other approach?

3. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Loch Creran SAC / MPA

4. Do you support the preferred approach (number 1) for managing this protected area?

5. Under the preferred approach should there be a permit scheme to maintain trawl effort at current levels?

6. If you answered no to question 4, do you support the other approach?

7. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Loch Laxford SAC

8. Do you support the management approach for this protected area?

9. Do you agree with the economic, social, and environmental assessments of the impact of the management approach?

Loch Sunart to Sound of Jura MPA
(Incorporating Loch Sunart MPA and Loch Sunart SAC)

10. Do you support the preferred approach (number 2) for managing this protected area?

11. If you answered no to question 10, do you support the other approach?

12. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Loch Sween MPA

13. Do you support the preferred approach (number 2) for managing this protected area?

14. If you answered no to question 13, do you support the other approach?

15. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Lochs Duich Long & Alsh SAC / MPA

16. Do you support the management approach for this protected area?

17. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Luce Bay SAC

18. Do you support the preferred approach (number 2) for managing this protected area?

19. If you answered no to Question 18, do you support one of the other approaches?

20. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Noss Head MPA

21. Do you support the management approach for this protected area?

22. Do you agree with the economic, social, and environmental assessments of the impact of the management approach?

Sanday SAC

23. Do you support the management approach for this protected area?

24. Do you agree with the economic, social, and environmental assessments of the impact of the management approach?

Small Isles MPA

25. Do you support the preferred approach (number 2) for managing this protected area?

26. If you answered no to Question 25, do you support the other approach?

27. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

South Arran MPA

28. Do you support the proposed high level of protection for recovery of the maerl beds, and conservation of the seagrass beds?

29. Should there be a permit scheme for creel vessels to work within these recovery areas for maerl beds, and moorings adjacent to the seagrass beds?

30. Do you support the preferred approach (number 3) for managing the protected area?

31. If you answered no to Question 30, do you support one of the other approaches?

32. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

St Kilda SAC

33. Do you support the management approach for this protected area?

34. Do you agree with the economic, social, and environmental assessments of the impact of the management approach?

Treshnish Isles SAC

35. Do you support the preferred approach (number 1) for managing this protected area?

36. If you answered no to Question 35, do you support the other approach?

37. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Upper Loch Fyne & Loch Goil MPA

38. Do you support the proposed high level of protection for the recovery of the flame shell bed?

39. If you support a high level of protection for the flame shell bed should provision be made to permit certain activities under specific circumstances?

40. Do you support the preferred spatial approach (number 1a) for managing recovery of the flame shell bed?

41. If you answered no to Question 40, do you support the other approach for managing recovery of the flame shell bed?

42. Do you support the preferred approach (number 2a) for managing the rest of the protected area?

43. If you answered no to Question 42, do you support the other approach for managing the rest of the protected area?

44. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Wester Ross MPA

45. Do you support the preferred approach (number 2) for managing the protected area?

46. If you answered no to Question 43, do you support the other approach?

47. Should static gear fisheries be restricted in the areas essential to the recovery of maerl beds and flame shell beds?

48. Under either approach should the Summer Isles area be zoned by depth to enable scallop dredging to continue?

49. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Wyre & Rousay Sounds MPA

50. Do you support the management approach for this protected area?

51. Do you agree with the economic, social, and environmental assessments of the impact of the management approach?

Appendix 2: List of Organisations

ORGANISATION NAME
Andy Race Fishmerchants Ltd
Ardtornish Estate Company
Argyll and Bute Council
Arran Natural History Society
Ayr Sea Angling Club
British Sub-Aqua Club
Centre for Marine Biodiversity and Biotechnology, Heriot-Watt University
Clashwhannon caravan park
COAST
Comhairle nan Eilean Siar
Cruising Association
Denholms Fishselling Ltd
Fauna & Flora International
Galloway Angling Centre
Galloway Static Gear Fishermens Association
Kirkmaiden Community Council
Mallaig & North West Fishermen's Association
Mallaig Boatyard
Mallaig Community Council
Mallaig Harbour Authority
Marine Concern
Marine Conservation Society
National Federation of Fishermen’s Organisations
Nor-Sea foods ltd
North Minch Shellfish Association
North West IFG Secretariat (c/o Moray Firth Partnership)
Ocean Breeze RIB tours
Onyer Marks Sea Fishing Charters
Orkney Fisheries Association
Orkney Skate Trust
Orkney Sustainable Fisheries Ltd
Outer Hebrides Inshore Fisheries Group
Project Seagrass
Royal Highland Yacht Club
RYA Scotland
Scottish Creelers and Divers
Scottish Environment LINK
Scottish Scallop Divers Association
Scottish Water
Scottish Wildlife Trust
Scottish Wildlife Trust Argyll & Lochaber Group

ORGANISATION NAME
Sea Change
Sealife Adventures
South West Inshore Fisheries Group
Southern Hebrides Against Marine Environmental Designations
Steampacket Hotel
Sustainable Inshore Fisheries Trust
Swimmers Against Plastic
The Clyde Fishermens Association
The Highland Council
The Loch Sunart & Sound of Mull Marine Community Initiative
The National Trust for Scotland
The Royal Burgh of Kirkcudbright and District Community Council
The Royal Society for the Protection of Birds (RSPB) Scotland
The Scottish Fishermen’s Federation
The Scottish Sea Angling Conservation Network
The Scottish White Fish Producers Association
The Shark Trust
Tigh Na Mara Hotel & Restaurant
West Highland Anchorages and Moorings Association
Wester Ross Fisheries Trust
Western Isles Fishermen's Association
WSFPO Ltd
133 individuals

Appendix 3: The SE LINK Campaign

Figure A3.1 – Distribution of responses

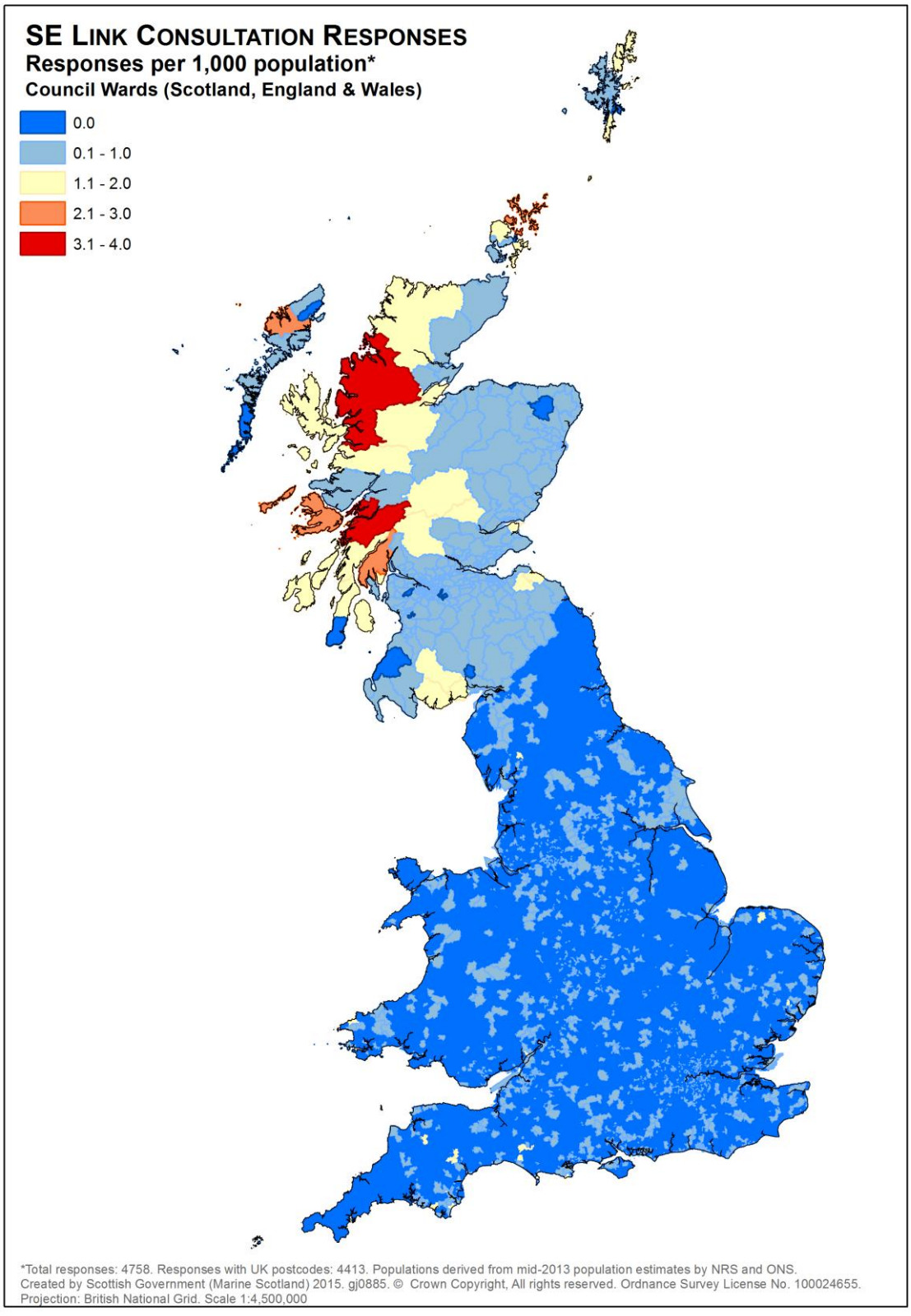


Table A3.1 - Additional or amended text submitted in responses

Marine Protection The seas around the British Isles are in dire need of rejuvenation if we are ever to claim back a healthy ecosystem. People are up in arms about the coral reefs of Australia, but the seas around our island are little thought about, except as a fishing reserve. If we are to fish from our seas for years t come it is vitally important that we nurture areas of diversity, where sea animals of all kinds can breed and thrive. Please protect all of these such areas for the generations to come and add to the areas protected.
As someone who lived in Scotland for several years and took part in the ringing and monitoring of sea birds off the west coast of Scotland, I know how important the seas are to the wildlife and people of Scotland. They need to be protected and nursed back to health so that both the wildlife and the local fishing communities can thrive.
Scallop dredging and bottom trawling are the 2 most damaging things one can do to the sea bed. Removing the filtration mechanism from any water system is barmy.
I grew up in a fish-trading family, earned my first pay packet as a fish packer and now live between the two important fishing ports of Fraserburgh and Peterhead, so the future of the fishing industry is very close to my heart. Because of this I thoroughly support the idea of MPAs, to provide for recovery and sustainability of stocks as well as the overall beauty and appeal of our marine environment, which we are so lucky to enjoy. – we should not risk leaving these areas unprotected. I therefore support the site-wide prohibition of bottom-towed, mobile fishing gear from all MPAs and the creation and/or extension of more generous and clearly defined protected areas. I strongly support marine protected areas (MPAs) in Scottish seas. You in the Scottish Government are being given a historic opportunity to help reverse the declining health of our marine environment and make a real change for coastal communities and Scotland as a whole.
Protect our seabeds. To have come so far and spent so much time and money on consultations and surveys it would be an absolute travesty if the chosen MPAs were not protected adequately. At the very least mobile bottom gear should be banned, the fact that scallop dredging hasn't already been banned within MPA areas with sea bed features that have been deemed worthy of protection beggars belief. For the Wester Ross MPA it would be easier to manage and police what type of fishing was going on within the MPA if there was a blanket ban on mobile bottom gear, and not these tiny dispersed patches that make it hard for any one to remember who is meant to be fishing where. Please take steps to move us forward from the absolute disaster that is currently Scottish Fisheries 'Management'
I have been a marine biologist for 15 years
I am very concerned that the Scottish government may be caving in to demands from the fishing industry to allow such damaging practices as scallop dredging in Marine Protected Areas.

strongly support marine protected areas (MPAs) in Scottish seas and believe over time these should encompass our countries coastline and extent outwards to allow ecosystems to flurish.
DO NOT Take the P out of MPAs! PROTECT OUR WATERS! NOBODY ELSE IS GOING TO!
I fully support the "Don't Take the P out of the MPA's!" campaign and frankly think that the government and Marine Scotland are very much "taking the P". The management options are ridiculous and not what was demanded in the public consultation that was already conducted for the MPA designation. There should be a total exclusion of destructive fishing methods such as trawling and dredging within Marine Protected Areas across Scotland and in particular in the South Arran MPA. The management does not fulfill the governments legal obligation with regards to the Water framework directive or the marine framework directive. This patchwork management does not give any level of meaningful protection. I think the government and marine Scotland need to take notice of the public mandate to protect the public right to fish. The management so far has been geared only towards the mobile fishing industry with no regards to the countless other stakeholders. There are huge economic benefits to the limitation of mobile fishing gear that are not being recognised due to Marine Scotlands relationship with the CFA and SFF. It is time for the seas to be managed properly for all stakeholders and not the minority of mobile fishermen.
Protected Areas Need to be Larger and with Full Protection . Scientists are discovering new remnant areas of fragile habitats (unsurveyed and undiscovered until now) with every passing year – we should not risk leaving these areas unprotected. Following a reasonable approach, it is important to protect the wider ecosystem in each MPA d as protected features (and many important others indirectly). – this will both severely constrain the scope for ecosystem recovery and the accurate compliance needed for successful MPAs. strongly support marine protected areas (MPAs) in Scottish seas. It's a critically important opportunity to help reverse the declining health of our marine environment and make a real change for coastal communities and Scotland as a whole. These measures also relate to a myriad of other linked economic goals such as increase tourism and sustainable fishing both angling and commercial. MPAs existing and new need proper protection to ensure responsible stewardship of our resources. Please properly protect Scotlands Seas
The proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling. . *** THATS THE WHOLE POINT ***

Preserve MPAs! Think of our children's futures! . It beggars belief that we are considering reducing the level of protection - we MUST increase protection. It we take New Zealand as an example, it has been proven that protected areas allow species to recover by acting as "nurseries". There MUST be total exclusion of ALL activities of every sort in these areas to allow these species - many of them in serious decline - to breed unhindered. They will then naturally migrate into areas outside of these protected areas where they can then be harvested. We need as many protected areas as possible that include every sort of habitat. Surely as an island with a maritime history we really should be setting an example and protecting our inshore seas for future generations?
Please make the Marine Protected Area's properly Protected
Husbandry not Rape! It's 2015! We should be learning how to farm the sea, and increase fish stocks. Instead we are doing the equivalent of running into the woods in our underwear with a brick shouting "Unga Bunga!!", and wondering why all the animals have vacated. strongly support marine protected areas (MPAs) in seas worldwide.
Remarkable - the single most damaging activity is to be permitted in "protected" areas. Is this a joke? Evidently not.I am indeed very concerned that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling.
Like many other people, I am very concerned that proposals put forward for consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling. - part of Scotland's own natural heritage that is already under incredible pressure.

I am a diver and marine biologist. I helped survey the shallow seabed around the coast of Northern Ireland in the 1980's and the Republic of Ireland in the 1990's. Rocky areas are in general not heavily impacted by man's activities, though they are degraded now everywhere by increased siltation compared with 40 years ago. Lobster and crab populations everywhere are badly impacted by fishing and probably this has resulted in changes to the natural state which we cannot detect because of a lack of fully protected areas. The main reason everywhere is degraded is primarily due to stirring up of bottom sediments and removal of the natural populations of hydroids, bryozoans and sponges which characterise these areas before fishing with bottom scraping gear begins. I have only rarely seen areas of flat seabed in this pristine state in the UK. In 1975 I started work with the Ulster Museum in Belfast and saw parts of the bottom of Strangford Lough. Large areas were mud, covered with a carpet of horse mussels. On top of the horse mussels were sponges, hydroids, variable scallops, and bryozoans. Between the mussels were thousands of worms and small molluscs. In the late 1980's these mussel beds were trawled by a fleet of scallop trawlers, taking Queen Scallops by the sackful. This went on for several months. In the aftermath I dived some of these areas and helped make a short film for the National Trust, called "scraping the bottom". (Now on Youtube).Fisheries scientists at the time claimed that the scallop populations would recover quickly as Queen Scallops reach maturity in 4-5 years. However this assumes that the natural fauna of the seabed allows safe settlement and initial growth of the scallops. It is now 27 years after the trawling and there has been no recovery and the remaining small areas of horse mussels have largely disappeared. The dead shells are colonised annually by sea squirts, but there is no recovery of the complex ecosystem which was there in the early 1980's (and probably since the ice sheets retreated and the climate stabilised thousands of years ago).The Northern Ireland government has spent several million pounds trying to restore this ecosystem as it is in breach of a European directive to protect this very habitat. , Long and Alsh SAC and ncMPA Loch Sunart to the Sound of Jura ncMPA (including Loch Sunart ncMPA and Loch Sunart SAC)Small Isles ncMPAWester Ross ncMPAI The point has been made many times, and proven conclusively in New Zealand, that fully protected areas actually benefit fishing by acting as recruitment grounds for many species, which then spill out of the protected areas and replenish the stocks in much larger areas. It is only common sense to take the same approach in the sea as a farmer would take if he wanted Pheasants, that is to provide habitat for the birds to breed by leaving pockets of woodland instead of converting everywhere to green, empty fields.
****I would like to add that I am pro-fishing on the whole, but efforts must be made to minimise the impact of destructive fishing practices - good management is a balance between supporting the industry and protecting the environment - please make an effort to do both!
Please use the Precautionary Principle which is meant to govern these kind of decisions. There is little evidence of this being used here.

Having been a diver for many years I have seen firsthand the terrible damage that bottom trawling and scallop dredging do to marine life and its ecosystem. Descending to a seabed that has been dredged on finds what looks like a graded road cut through the bottom filled with smashed shells. These scars on the seabed take a long time to heal and whilst they are, a huge range of other marine life is impacted by the loss of habitat. Experiments in the Isle of Mann and Lyme bay have shown the huge benefits o all fisheries that can be accrued by banning dredging.
PROTECT THEM NOW!
strongly support marine protected areas (MPAs) in Scottish seas. I have also written to several MSP's on this matter on behalf of the RSPB.
I have over 35 years and over 9000 dives thought the west coast of Scotland Scallop dredging has irreversibly damaged thousands of acres of the the sea bed and marine habitat also I have seen two low lying bolder reefs towed away and totally destroyed And coterie to popular belief scallop dredgers do tow over reefs I can show or provide government scientists information to support my statement hence I whish to state that.
If the SNP are going to vote for English matters (NHS England) as they say it affects Scotland, well so does protection of Scottish waters affect England and the rest of the world!
As a recreational diver living in the North of England, I make frequent trips to Scotland to dive in Scottish seas.
Thank you for listening,
Although I am not a resident of Scotland, I am still a resident of this island and damage to any part of our island environment affects us all. Many years ago I saw a practical demonstration on a beach, using a mock-up of the seabed, a trawl net and a tractor, as to the incredibly damaging effects of bottom trawling on the sea floor ecosystem. That demonstration still lives with me and brought home the callous disregard of the bottom-trawling, fishing industry (both inshore and deep-sea, the latter mainly by French and Spanish trawlers) to the damage they do. It also demonstrated the urgent need to protect sufficient areas in order to provide a sustainable seed-bed for species recovery to replenish the rest of the ecosystem.
The MPAs are such a tiny part of our marine environment that what we have should be protected strongly.
Don't Take the P out of MPAs! Proper protection for our sea life.
I can't believe that you'd perpetuate this destructive methos of fishing.
Don't Take the P out of MPAs! - lead by example To whom it may concern within the Scottish Government,
I lived in Scotland for 33 years, and still care!!

Unlike my friends, I couldn't join any party that doesn't pay proper attention to issues like this.
Please listen. I am only 17 years old and I don't want to grow up with marine life being unnecessarily destroyed.
Lack of Protection in MPAs The consultation takes a very half-hearted approach to restoring years of damaging activity. By only trying to prevent further damage, the inevitable result will actually be further decline and a gradual reduction in the opportunity to have a sustainable fishing industry. This is without considering the moral imperative to try and undo the damage the human activity has done to wildlife and the impoverished legacy we will leave to succeeding generations. The Scottish Government needs to take a much more ambitious approach to protecting and promoting its natural heritage. Future generations will not thank the current Government for only leaving them museum specimens and images of what they have lost. Longer-term thinking is imperative, as is a less parochial attitude to the Government's international responsibilities. The seas belong to everyone.
I am extremely concerned and upset that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling.
It is clear we need strong regulation to ensure a sustainable future for our seas and coastal areas. Otherwise, there will eventually be little to base a fishing industry on, not to mention the knock-on effects of a depleted marine environment. I am very concerned to hear that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling.
As a diver with personal knowledge and experience diving in Scotland, I therefore support the proposals for site-wide prohibition of bottom-towed, mobile fishing gear from the following MPAs: Treshnish Isles SAC (option 1)Loch Creran ncMPA/SAC (option 2) [I know this loch very well underwater and can vouch that it is a rare, delicate, beautiful and unique ecosystem that must be protected. Luce Bay SAC (option 1), and so I think there should instead be a site-wide prohibition of bottom-towed, mobile fishing gear in these MPAs: Loch Sween ncMPA South Arran ncMPA Upper Loch Fyne and Loch Goil ncMPA [Loch Fyne is a famous and remarkable dive site with very special and beautiful ecosystems]Lochs Duich

SCALLOP DREDGING MUST BE CURTAILED IN OUR COASTAL WATERS!! As a group of concerned divers engaged in citizen science, we have seen, first hand, the damage caused by scallop dredgers. As you must know, dredgers destroy everything in their path and also generate countless tonnes of silt and mud that chokes marine life in the surrounding area. This insane practice is destroying our coastal waters and you will be held responsible, in the not too distant future, when they cease to support a resource for the fishing communities around our coastline and the industry in general. This type of fishing activity is not sustainable. Scallop dredging is fundamentally not compatible with our coastal waters which act as a nursery for countless species that contribute to Scotland's rich and unique biodiversity. This is particularly true of our west coast sea lochs which contain many species not found anywhere else in our coastal waters. Our sea lochs are extremely fragile and vulnerable. As stated by the Save Scottish Seas project we are very concerned that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling.
I live in the South but care deeply about all our marine habitats that I believe sadly need protecting because of our human ignorance and greed.
As a diver I have had personal visual experience of the effect of stopping Scallop Dredging in the Firth of Lorne where after seven years a previously drab reef was vibrant with life. The bottom had been damaged as is known but this was in relative mid water where the generated silt plume had settled on the reef and killed many organisms.
Please do the right thing!
I am a scuba diver who has visited Scotland many times purely for the purposes of diving in areas that are vibrant with sealife. I have seen first hand the effect of scallop dredging and bottom trawling on the ocean floor, and the intense damage it does to all natural life there.
Don't Take the P out of MPAs! Think of the future! Please protect the Scottish waters from intensive fishing. I live on the coast in England and care deeply that all the UK waters are carefully managed. Think long term - do not damage the future.
I am a PhD student in Biology.

The Scottish Sub Aqua Club is the governing body for recreational diving in Scotland. Formed in 1953 we have seventy branches throughout Scotland. Our members dive around our coast on a regular basis. Divers are unique in that they are the only people who see first hand the devastation caused by scallop dredging and bottom trawling. As an organisation we have supported the Scottish Governments proposals to set up MPA's and our members have expressed that support through submissions to past consultations. However we are deeply concerned that the Scottish Government may allow these extremely destructive activities to continue within proposed MPA's. Our members have seen how quickly the seabed recovered when scallop dredging was banned in The Firth of Lorne SAC. Whilst it is important to protect the habitat of rare and protected species we would also point out that protecting areas from damaging activities allows those areas to become seed beds and breeding grounds for commercial species. It is well documented that everywhere around the world where areas have been protected fishermen have seen increased catches around these zones. We would therefore urge the Scottish government to implement fully the protection our seas need to recover from years of damaging activities. By banning scallop dredging and bottom trawling we will soon see a healthy ecosystem, one that will lead to a more sustainable and prosperous fishing industry.
Please Don't Take the 'Protection' out of MPAs! I am a scuba diver and very fmailiar with the marine environment around Scotland which I visit regularly, I have seen first hand the damage casued by invasive fishing methods such as scallop dregding. I fully agree with the MCS's concerns as follows.
Below is the standard wording that is being circulated for people to add their names to. I wholeheartedly agree with what it says and am concerned that the proposals do NOT adequately protect our marine environment and urge you to consult further with those who have the protection of these areas at heart and not just the fisherman, as seems to be the case here. Don't let Labour score points by giving them the opportunity to claim a u-turn, but an exercise in public consultation.
As a keen Diver / boat owner I have personally witnessed the destruction of scallop fishing on the sea bed ,

Marine "protected" Areas? Really? What protection? Don't Take the P out of MPAs! I should initially point out that I am not a resident of Scotland. However, I am an enthusiastic amateur scuba diver have holidayed in Scotland on more than a dozen occasions to enjoy the rich diversity of habitats and marine life that Scottish waters have historically offered. The reduction in the diversity and density of marine life has been obvious to even the most casual observers under the water. The environmental devastation brought about by scallop dredging and bottom trawling in particular has so reduced the attraction of the marine environment that I now have great difficulty getting a group of divers together and consequently it looks unlikely that I or any of my friends will visit Scotland this year. It is blindingly obvious that proposals made in this consultation are wholly inadequate to protect marine habitats and species from destructive forms of fishing, such as scallop dredging and bottom trawling. These nature conservation Marine Protected Areas (ncMPAs) and Special Areas of Conservation (SACs) are desperately needed to help protect our damaged seas and allow them to recover. – we cannot sensibly risk leaving these areas unprotected.
This response is my endorsement of the response of the Marine Conservation Society of which I have been a member for many years and whose work I admire and trust.
I am currently living in Germany after having lived for 15 years in Scotland!
As a Scotsman and a lover of the marine environment
Please protect the seas around Britain. Dredging is wrecking the seabed
I am a restaurateur and want to ensure that we have fish and shelfish for future generations.
I am passionate about the sea. Bottom trawling and scallop dredging are the activities that do most damage and must not be allowed to continue in sensitive and rich areas.
Protection is vital I could send you the copied letter that many others will. However, I know you won't read it and I hope with all my soul that you will read and think about the reasons behind why so many people are getting het up about the MPAs. These are vital to the continuing health of our seas. New Zealand has already proved how these can work and benefit everyone as they act as nurseries for marine life. With the surrounding areas flourishing in only a few short years once PROPER protection takes place. It makes sense! You don't go raiding the newly grown crops in a field or vegetable patch! You let them mature and prolifigate. Look at the data from New Zealand it is sound and I have been over there and seen for myself. I have also seen the devastation done by bottom trawling and dredgers. Please, look at the data, look at the science.
MPA consultation please save our seas. Dredging affects puffin food etc. Please safeguard MPAs.

Protection is the Operative Word Bottom trawling and scallop dredging have been show to be highly damaging to the sea bed ecosystem, leading to loss of species diversity, productivity and total biomass. The existing and proposed MPAs will only be truly protected if these activities are totally prohibited from being conducted within them. I support the Marine Conservation Society in its campaign to ensure genuine protection of the existing and proposed MPAs including an outright ban on the use of mobile fishing gear. I also believe that making the designated areas larger and with simpler, less convoluted boundaries will make their protection easier and less likely to be breached.
I ask you to take the strongest stance possible at this time to ensure that the Marine Protected Areas are given the clout to fulfill the promise of their creation to give real and substantial protection and meet some of our obligations under EC law.d as protected features.
Please make every effort to ensure that the MPAs are created with the strongest possible bite to ensure their long-lasting effectiveness.
strongly support marine protected areas, (MPAs) in Scottish seas. Although this was largely pre-written I have read it carefully and agree with it in total
Please re-think Marine Protected Area Proposals I am very concerned that proposals put forward in the MPA consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling. Marine Protected Areas and Special Areas of Conservation must be managed properly to enable the recovery of our inshore waters that have been so badly damaged by short-term-profit fishing methods. If this is not put in place as soon as possible, the catches these methods produce will not be possible in the long-term since the species will die out as their environment is destroyed. This is not fair to generations to come or to the marine life itself. Please listen to the points made by all the environmental agencies, who are warning against these proposals, and re-think the scoping and management of these precious marine areas.
Unsustainable use of MPAs
A chance to show you can do better than England.
Please Protect Scottish MPAs. Marine Protected Areas (MPAs) should do as stated - protect the marine habitat and ecology. I am therefore concerned about proposals put forward in the public consultation that could allow for the continuation of scallop dredging and bottom trawling - both damaging activities to our marine environment. MPAs are necessary because our seas need to recover form the practices of industrial fishing, to allow their recovery and a long-term sustainable fishing industry.
To quote German theologian Dietrich Bonhoeffer, "The ultimate test of a moral society is the kind of world it leaves to its children." A fundamental and radical change in our core values, that puts planetary health – and therefore our own – at the centre of political discourse, is absolutely essential if we are to have any hope of stepping back from a very uncertain and miserable future.

As an Overseas Scot, I beg you,
I am concerned that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling. I feel it is somewhat counter-intuitive to reduce the protection given to sites which are currently labelled as in need of conservation or protection.
. Whilst I would need to review the key characteristics of each MPA separately to be specific in my conclusions, MPAs are only worth having if they protect, and that means management measures, regulation and enforcement of those measures. See my book 'Marine Biodiversity Conservation: A Practical Approach' published this year by Routledge for evidence. I strongly support marine protected areas (MPAs) in Scottish seas. They provide a historic opportunity to protect rare, threatened and high diversity habitats that include fragile and/or declining species to the benefit of coastal communities and Scotland as a whole.
Dredging and bottom trawling are highly destructive and have no place in a protected area. Protection should mean just that.
Let's take responsibility for our oceans. With these MPAs Scotland has the opportunity to be a shining example of how to manage oceans successfully and sustainably. Scotland needs to avoid bureaucracy involved in our fishing industry and look beyond the short term and to our sustained future of fishing. If someone is reading this comment, I am writing this as an appeal to your morally responsible side that I know we all have. This is about our future and our children's future. It is not about the next 4 years and how much the government is showing to help our economy or jobs, this is about the bigger picture and realizing that with no fish there is no fishing industry. Everyone can see that we can continue exploiting our oceans in the way that we are so lets use this chance we have to change things.
I therefore support the proposals for site-wide prohibition of bottom-towed, mobile fishing gear from the following MPAs: Loch Sunart to Sound of Jura MPA, designated for its critically endangered Common Skate which under the EU habitats directive and the Convention of Biological Diversity, you are obliged to protect completely. Meaning no trawling, dredging that could endanger the breeding grounds of this rare and iconic species. You alluding the public with the promise of protection when really, the Scottish Government are making paper parks to look good in front of the EU. This is not good enough and unfortunately for you, more people care about OUR Scottish seas than you know.
I feel incredibly strongly about the need to support marine protected areas (MPAs) in Scottish seas.
Although not a Scottish resident, I frequently holiday there and it's the wildlife that attracts me. Without this protection the biodiversity of the seas will demonise along with all those species that depend directly and indirectly on them -making Scotland a less attractive tourist destination as well as less fulfilling to live in.
Damage to our marine wildlife.

What do you think the whole point of these areas is for? We demand full protection NOW!
"& CURRENT & FUTURE MASS ENERGY PROPOSALS".
Please don't ignore this because it's a format letter
As a Scuba diver I am very concerned with the proposals put forward. If we want to continue to fish from the seas and oceans surrounding the plant we must look after them and take into consideration that they are not a limitless supply. We must all recognise that the limits are very real and we get closer and closer to them every day. Please reconsider this is a vital decision for the seas and oceans future.
Ensure Meaningful Conservation - Don't Take the P out of MPAs! I saw the establishment of Scotland's MPAs as a good step forward in reversing the decline and damage suffered by the our seas' ecosystem. This I observed from many years as a sports diver around our coasts, in particular in the MPA areas of Loch Duich, Wester Ross and Sunart. I strongly support the following views, jointly expressed by many.
Please think long term, and think about jobs for the future as well as for now!
Please protect our marine environment. Though resident in N England, I am Scots born (Banff), return regularly, and retain a deep concern for my homeland and its surrounding seas. The trashing of our fishing grounds has been a major worry to me for years. We have to stop it.
Having grown up on the west coast as the son of a Scottish Fisherman I
SHORT TERM GAIN IS NOT IN THE LONG TERM INTEREST OF HUMANITY.SUSTAINABILITY MUST BE THE FUTURE.
Don't Take the P out of MPAs! - Wildlife Tourism brings in more money than fishing for Scotland! My Bit - Wildlife tourism brings in more money than fishing to the Scotland economy, without our seas in good order most of the wildlife doesn't exist as much of it relies on the sea for shelter and food. Wildlife tourism is much more profitable and not kept afloat only through grants and benefits the way fishing is.
Protect the Marine environment Please! I do think it really is very important that we protect our seas and the marine creatures that inhabit them. I enjoy eating fish but I don't want to eat it knowing that the way in which they have been caught has been damaging to the marine environment. I would much rather have fish occasionally and give species a chance to recover. The best way to do this is by the following which I completely support.
Please ensure MPAs are properly protected Please ensure that MPAs do what the names says and truly protect marine life. Scotland has an amazing natural heritage which is part of its great attraction for tourism. Please do the right thing and safeguard the biodiversity of Scottish seas for the creatures in them and those who live sustainably from them and those who come to see and enjoy them. Thank you.

MPAs! Please act accordingly.
It is very worrying that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling.Thank you for reading this.
Do not allow scallop dredging and bottom trawling The Scottish Parliament has done a lot of positive things but this is not one of them; it is philistine and unforgivable. I have dived area which have been dredged or trawled. They were not scenic dives as there was no life to see and everything was covered with a suffocating layer of silt. A lot of damage for a small harvest when there are much better ways to harvest scallops.
This really is the bare minimum. Please try not to take practically the complete P out of MPAs. History will think of you extremely poorly if you do
I am writing this as a diver of 50 years experience, who has enjoyed and marvelled at the underwater environment. I have also seen the lasting damage done to the environment and the associated marine life by scallop dredging. Thus
Mobile bottom fishing is an unacceptible form of fishing. If it was performed above land, there would be outrage at the swath of destruction.
I am writing as part of this campaign as I feel that protecting our biodiversity and habitats is of vital importance not only in its own right, but for our health and the health of our planet.
Careful consideration for correct long term results. Please reconsider carefully.
As a keen Scuba diver, and a member of seasearch who has been collecting data for these sites, I agree that It is the saddest site in the world, diving down on to a known flame shell bed and only witnessing a ploughed field, because a trawler has illegally been through, just to get the last few scallops in Loch Fyne.
I am not a constituant, but I am a regular visitor to Scotland, coming almost invariably for the scuba diving. While diving we get to see what dredging does to the environment. Bloody wrecks it. There's no joy to be had diving were the dredgers have been through. While they support your economy in one way, so do I and the thousands like me. Driving us away may provide a short term gain, but it will be less than you expect.
I studied marine biology and ecology in Scotland, I am now a professional applied marine ecologist, I have worked with Scottish Natural Heritage for some years and I have personally dived on sites dredged by scallop dredgers. The damage done is very real, not so different to taking a plough through a rich woodland and is in no imagination compatable with any form of Marine Protected Area.
Marine Conservation are an economic asset

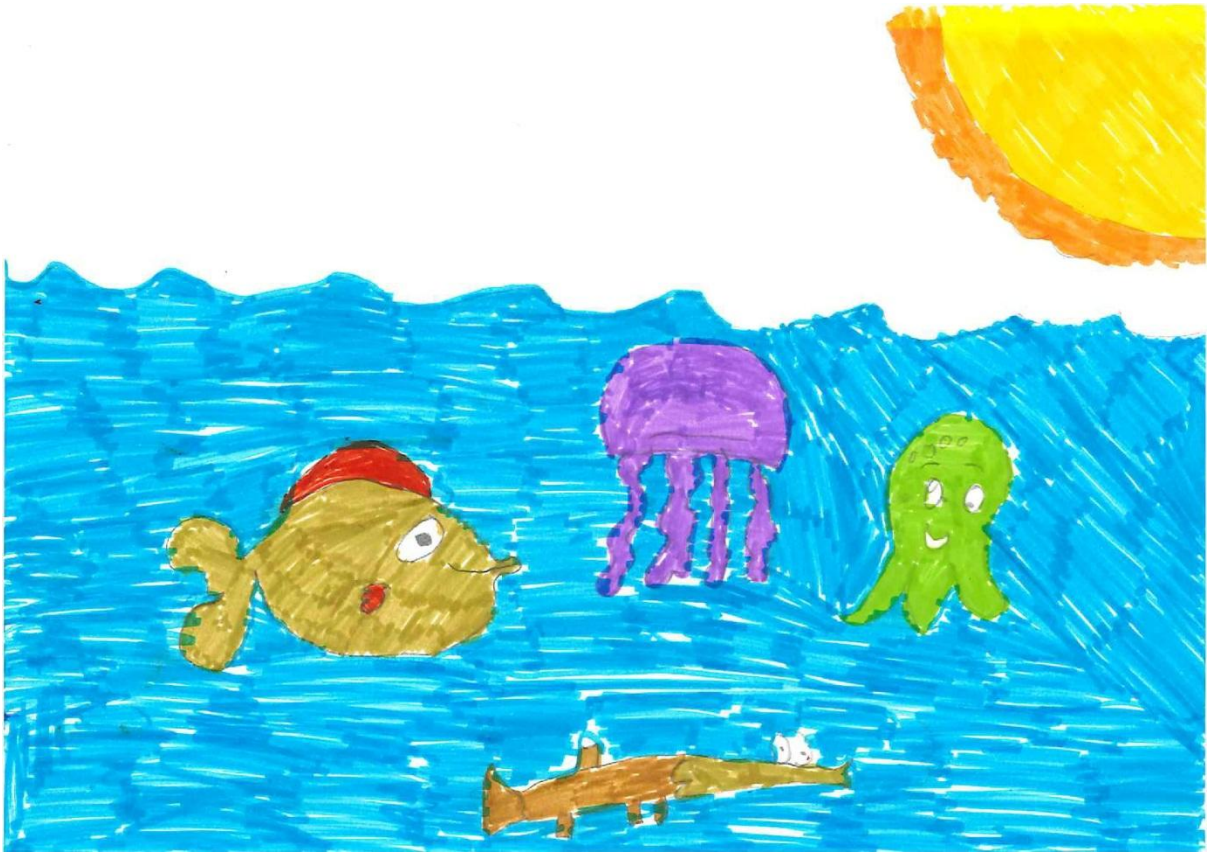
I am not qualified to comment on specific areas, but I have seen the effect of scallop dredging and believe that far greater protection is required than in the current proposals. My wife and I have an interest as visitors to Argyll, especially Mull and Islay, where we contribute to the environmental tourism £ on every visit.
I am concerned that proposals put forward in the consultation on marine protected areas will not protect marine habitats and species from damaging fishing activities such as scallop dredging and bottom trawling.
Don't Take the P out of MPAs! I care about this and so should you!! Have you ever seen the damage caused by bottom dredging and scallop dredging to our seabed? I have and ..
Principled approach needed for MPA The conceptual model used in determine the protection regime for MPAs is flawed. The current socioeconomic arrangements are balanced against the environmental benefits of protection as if a simple trade-off can be made. Furthermore, the displacement effects of protection are factored into the decision-making, which seems illogical. If an area merits protection, it merits protection: if the consequences of that are that other areas become in need of protection then MPAs will need to be extended.It is important for Scotland to think long-term in the way it implements its Marine Plan: both the intrinsic value of its marine environment and in the longer term the tourism, recreational and repetitional value of protecting this environment outweigh the short-term costs. And these costs are easier to identify and compensate than the costs of continuing to degrade our marine heritage.
Whilst it's not for us south of the border to dictate what the Scottish Parliament should or shouldn't do, we can encourage by example, and in my own locality the nearest MPA's will benefit the marine environment well beyond their boundaries. This will be to the advantage of everyone who harvests or uses our seas.
The areas need to be protected and not damaged.
For Pities sake look at the reality of your proposals. Seabed destruction is your responsibility! You are not entitled to encourage destruction...it is your job to prevent it. You must know that or why are you doing the job you are doing?
Designating such areas as "Marine Protected Areas" yet permitting damaging activities seems to be a very peculiar form of protection.Please ensure that the protection afforded in these areas is worthy of the term.
Scotland has a much higher marine biodiversity than Germany has, so protection against bottom trawling is crucial and more effective in Scotland.
Those of us in England deeply concerned by the Westminster Government's shockingly irresponsible failure to give our seas anything remotely like that which they desperately need had hoped that they would be shamed into action by Scotland's mature and responsible plan to protect its share of the coastal waters.Do not betray our trust and let us down!

I have seen the damage, first hand, that this type of fishing does to benthic organism and to the seabed, therefore I support the proposals for site-wide prohibition of bottom-towed, mobile fishing gear
Thank you for reading and taking this issue seriously. It's your planet too.
I dive Scottish waters regularly and have witnessed the destructiveness of this form of fishing. I urge you to ensure that a protected area is what it says .... protected.
DO NOT BEHAVE LIKE TORIES!
I have dived in areas of Scotland where scallop dredging and beam trawling have created havoc with the marine life on the sea bed. In consequence
And why can't we look a bit more long term? Preserving these creatures will support ecological tourism in our beautiful country.
The Governments of England, Wales and Scotland need to approve and implement the setting up as many MPAs as possible round the coast of the UK, to protect existing fish and sea life and allow the marine environment to recover.
strongly support marine protected areas (MPAs) in Scottish seas, just the same as in English seas. In Dorset where I live conservationists successfully campaigned for a Marine Conservation Zone in Studland Bay, and benefits are already being observed. I therefore support the set up of effective MPAs in Scottish seas too.
I am a diver and regularly dive all round Scotland and see first hand the devastation caused by dredging and bottom trawling. Both these activities totally destroy the sea bed and all the marine life in the area regardless of the target species of the fishing activity. These approaches to fishing are nothing more than vandalism to the marine environment and should not be allowed as they kill everything and leave a barren area devoid of life. If this occurred on land where the public could see the wanton destruction there would be huge public protest but as it takes place under the sea hidden form public gaze the authorities ignore it. I believe that targeted approaches such as hand diving for scallops where only the target species (and legal size) is taken should be encouraged and dredging and bottom trawling should be actively restricted.
As a diver, I have seen the devastation of the seabed caused by scallop dredging and am very concerned that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling. Just because the damage to the environment caused by these activities is not visible to most, does not mean it does not exist.
Why wouldn't you take this one significant decision to put the environment front and centre. Lets face it, without it we and, crucially, our children are to be left a dead planet.

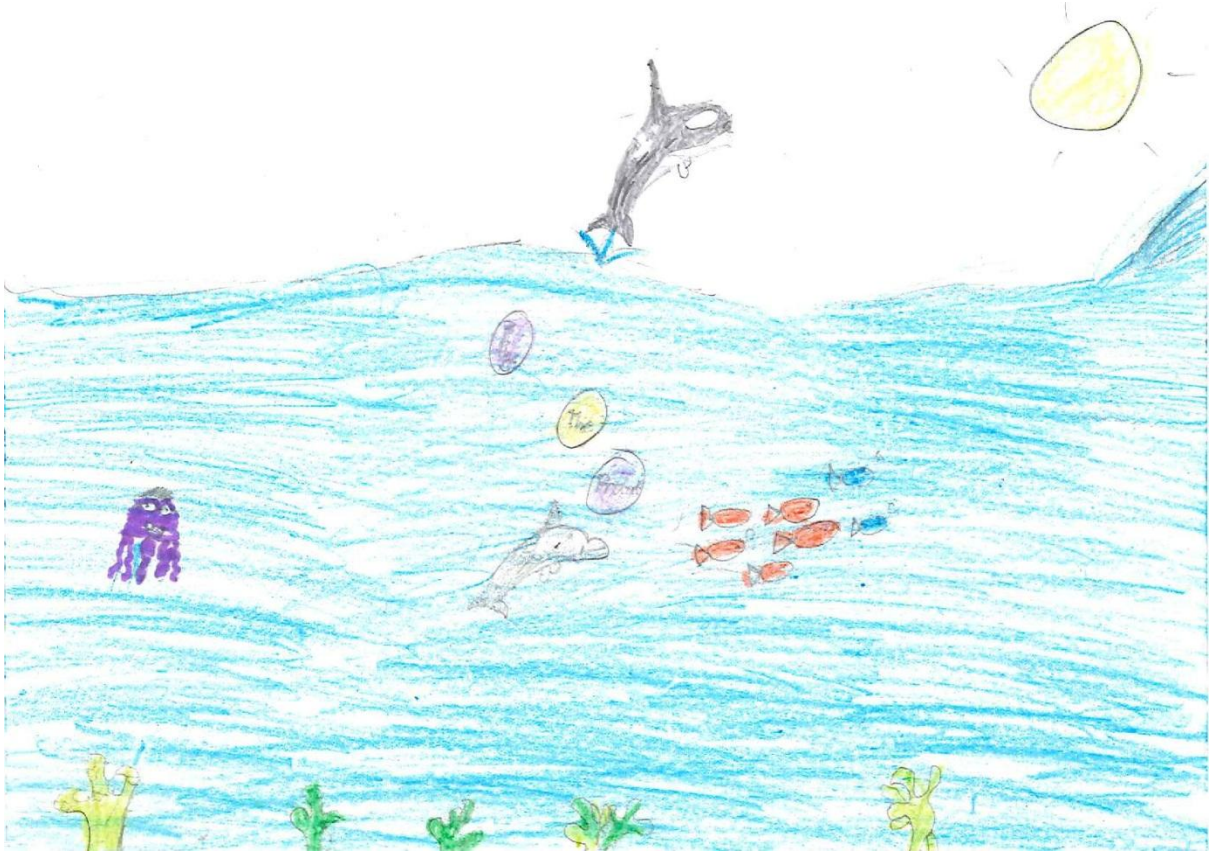
I have read the response to the public consultation drafted by Save Scottish Seas and I endorse it.
I am not a Scot myself, but I and my family frequently visit the western Highlands on holiday. When we stayed at Culduie on the Applecross Peninsula, we were massively impressed by the abundance of marine life to be found even in the shallow waters of a nearby beach; these waters are so much more alive than the ones I am used to off the east coast of England. This is something very special that needs to be protected. The rest of my letter is in the terms suggested by the Marine Conservation Society.
As a Scuba Diver, I have frequently witnessed first hand the terrible damage bottom trawling can wreak on the seabed where everything in it's path gets destroyed, decimating many species in the food chain.
Conservation seems to mean management in Scotland - not protection. Seal conservation areas are a joke only making quotas for seals to be shot to be managed by area. I am very concerned that proposals put forward in this **current** consultation will not adequately protect marine habitats and species from damaging fishing activities, such as scallop dredging and bottom trawling.
Although most of this is a 'form letter', I regard it as well researched and representing my views well. I grew up as the daughter of a marine zoologist who taught me well the damage that is done to the sea bed by dredging and similar methods of fishing. A protected area should be just that - protected. Our industrial fisheries must shrink, and the environment allowed to recover. The alternative is we have nothing living on the sea bottom to catch at all in future.
Thank you for reading this.
PS. My Father is buried next to some of the Piper Alpha lads, near Carnoustie, and he wouldn't like it either.
As a Research Biologist
I am very concerned that proposals put forward in this consultation will not adequately protect marine habitats and species from damaging fishing activities. I wish to close MPA's to all damaging dredging and bottom trawling in the hope it may lead a proper recovery and be managed in the public interest, not just for a few.
What is the point of marking an area as an MPA when you allow bottom trawling to destroy the habitat? If you are to be independent of the UK then show that you are strong enough to withstand the cries of the fishermen. The fishermen will benefit from these MPAs when they become calm, safe breeding grounds. Please listen to the scientists and Don't Take the P out of MPAs.
Better still, MPAs can be efficient in the area they take up for the regeneration they bring about. In turn, the wider economic benefit to coastal communities is huge for relatively little cost.No brainer, really.

Please do not miss this opportunity to keep our Scottish seas and Lochs protected for us and for future generations.
LEAVE WELL ALONE! We don't want our fishing stocks ravaged, as happened off the Grand Banks (Newfoundland)
Don't destroy fishermen livelihoods. Keep the sea free for every body. Don't listen to miss informed students.
I am very concerned that proposals put forward in this consultation will not adequately protect existing and long used fishing grounds and the human species from damaging NGO activities, such as politicised science and misrepresentation of the realities around our shores. These nature conservation Marine Protected Areas (ncMPAs) and Special Areas of Conservation (SACs) should be managed to help protect AND recover our damaged fishing industry. Scientists are discovering a new working relationship with the industry with every passing year – we should not risk loosing this. Following the same scientifically precautionary approach, it is important to protect the wider human aspects in each MPA to support the recovery of the Scottish fleet. Many of the proposed management areas are too complex in shape because the boundaries have been drawn so close to ancient fishing grounds – this will both severely constrain the scope for our fragile coastal communities so reliant on the fishing industry.I therefore can not support the proposals for site-wide prohibition of bottom-towed, mobile fishing gear from the following MPAs: Treshnish Isles SAC (option 1)Loch Creran ncMPA/SAC (option 2)Luce Bay SAC (option 1)Sanday SAC (option 1 - only option)None of the proposed management approaches in the sites below adequately assess the existing level of effort in these areas. Indeed one refers to a method of fishing that is not even used in the area. If recovery of the species to be protected is the goal then I think there should be a greater reduction on the targeted fishery that does take place there. ie Angling for common skate Loch Sunart to the Sound of Jura ncMPA (including Loch Sunart ncMPA and Loch Sunart SAC).I strongly support marine protected areas (MPAs) in Scottish seas. It’s an historic opportunity to help reverse the declining health of our fishing industry and make a real change for coastal communities and Scotland as a whole, if properly managed. MPAs existing and new need proper protection to ensure responsible stewardship of our shared resources by remaining shared between all stakeholders.

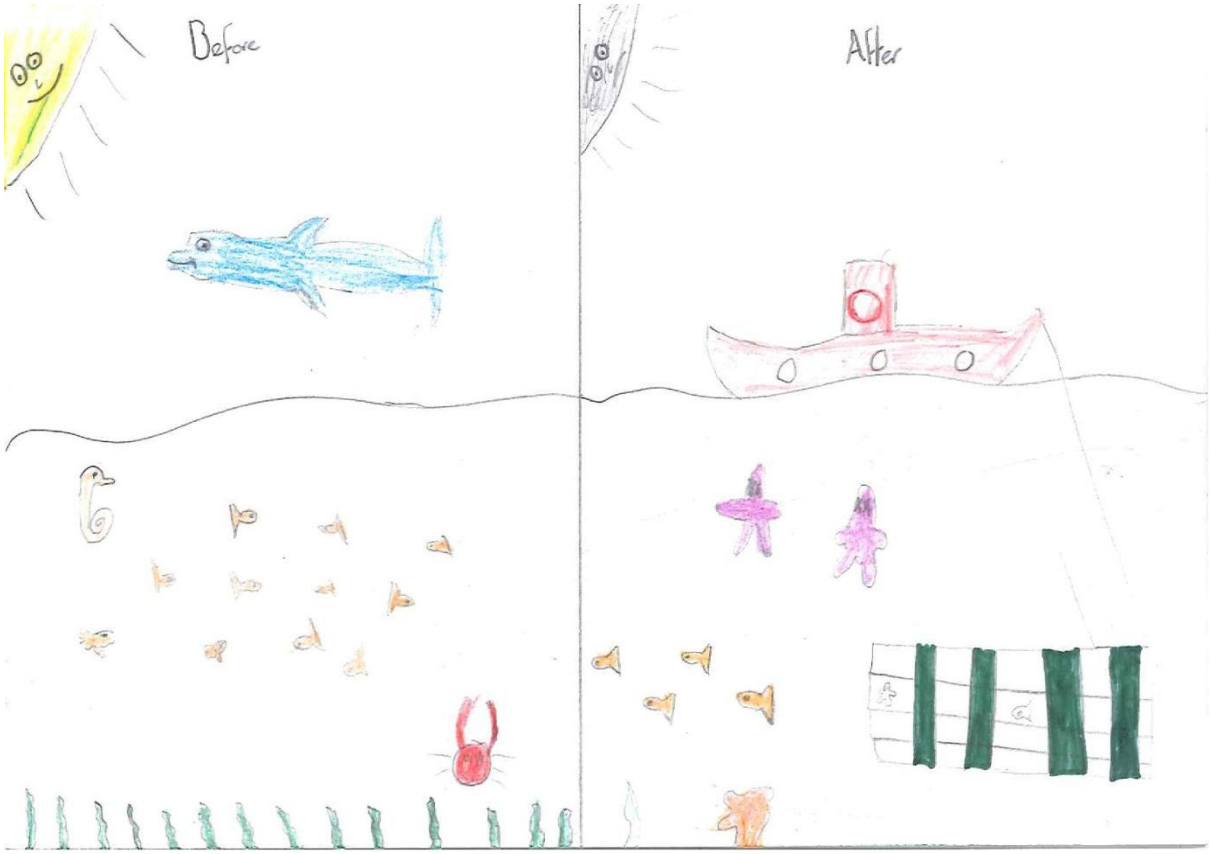
Appendix 4: Sunnyside Ocean Defenders



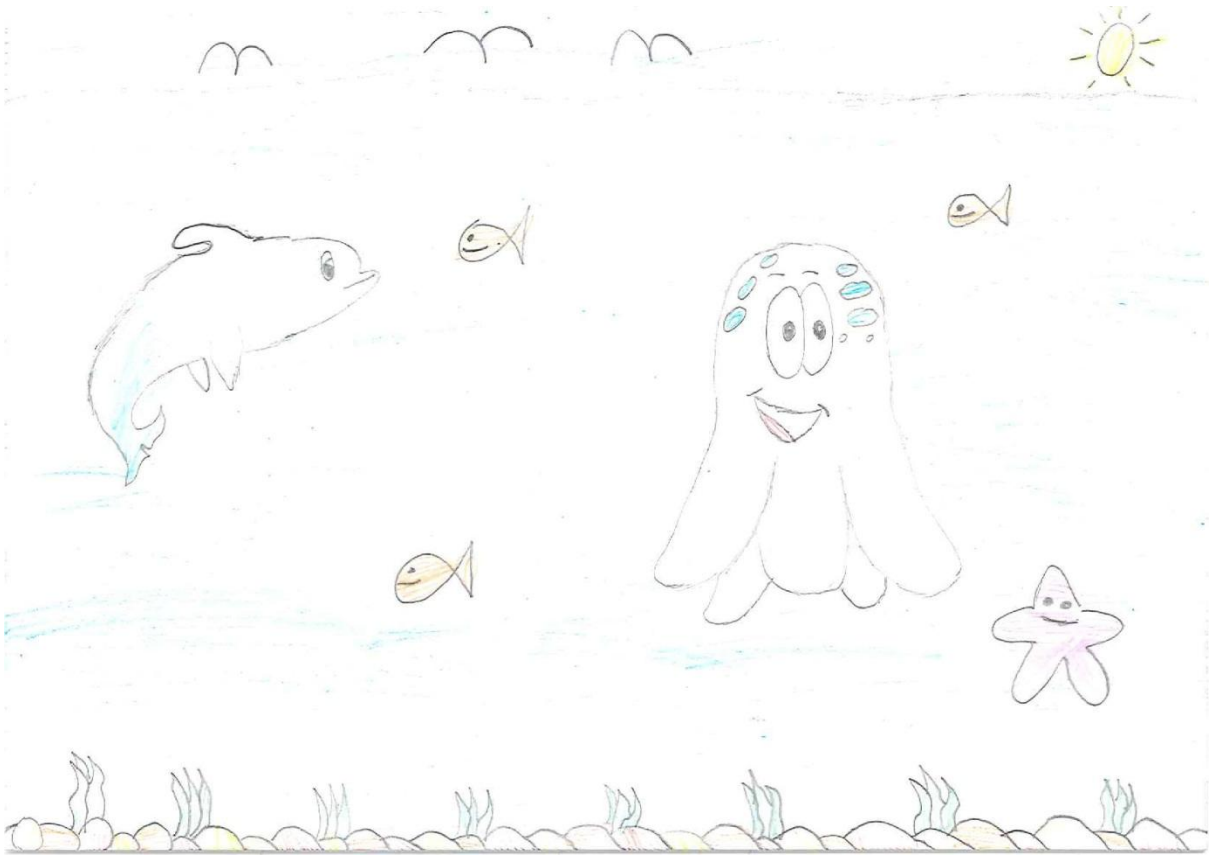

this is what it will look like if you
leave nature alone

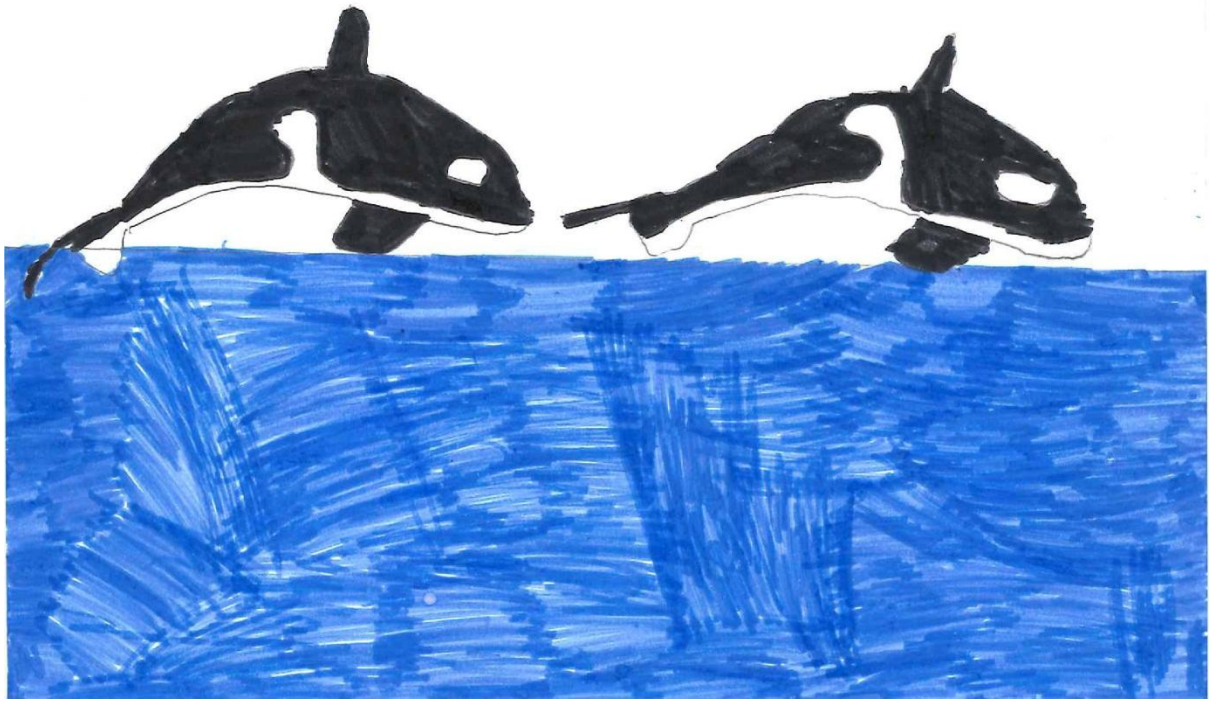



BRING OUR
SEAS BACK

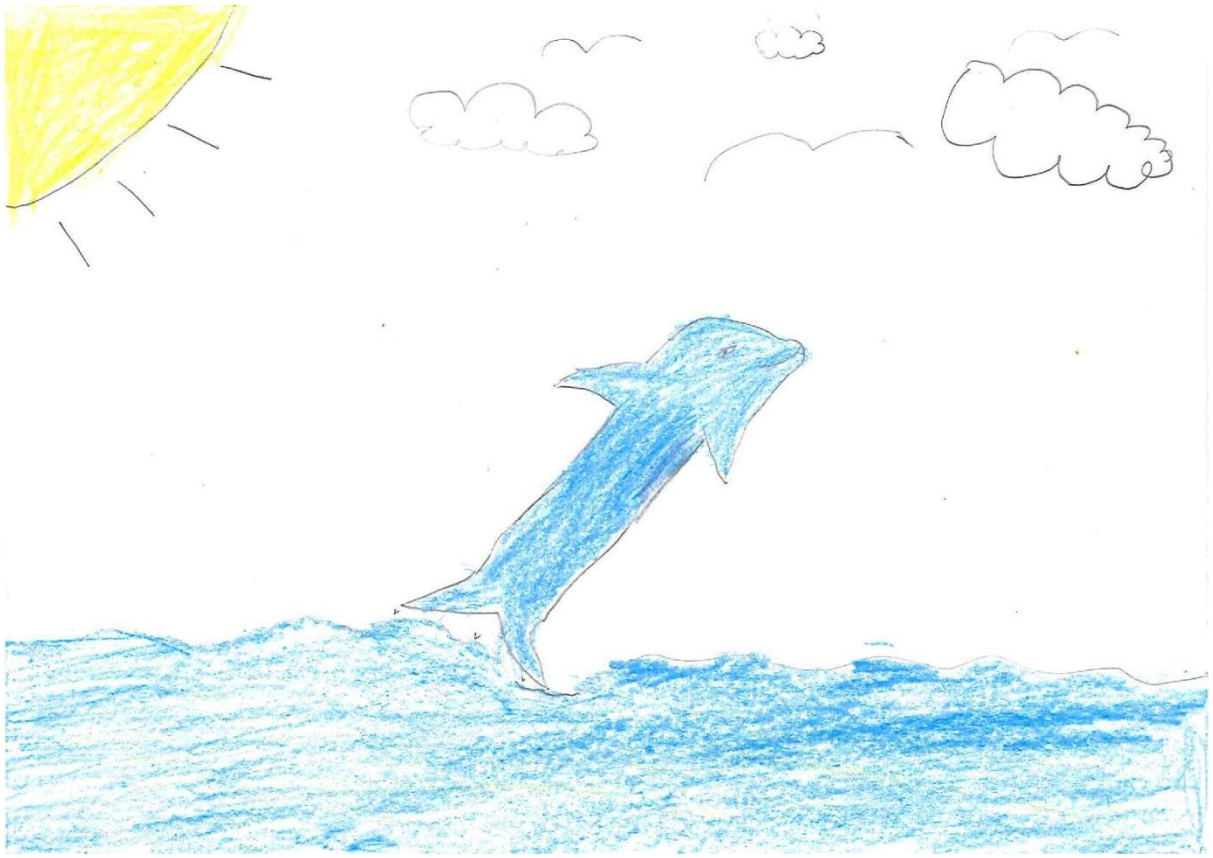

Before
After

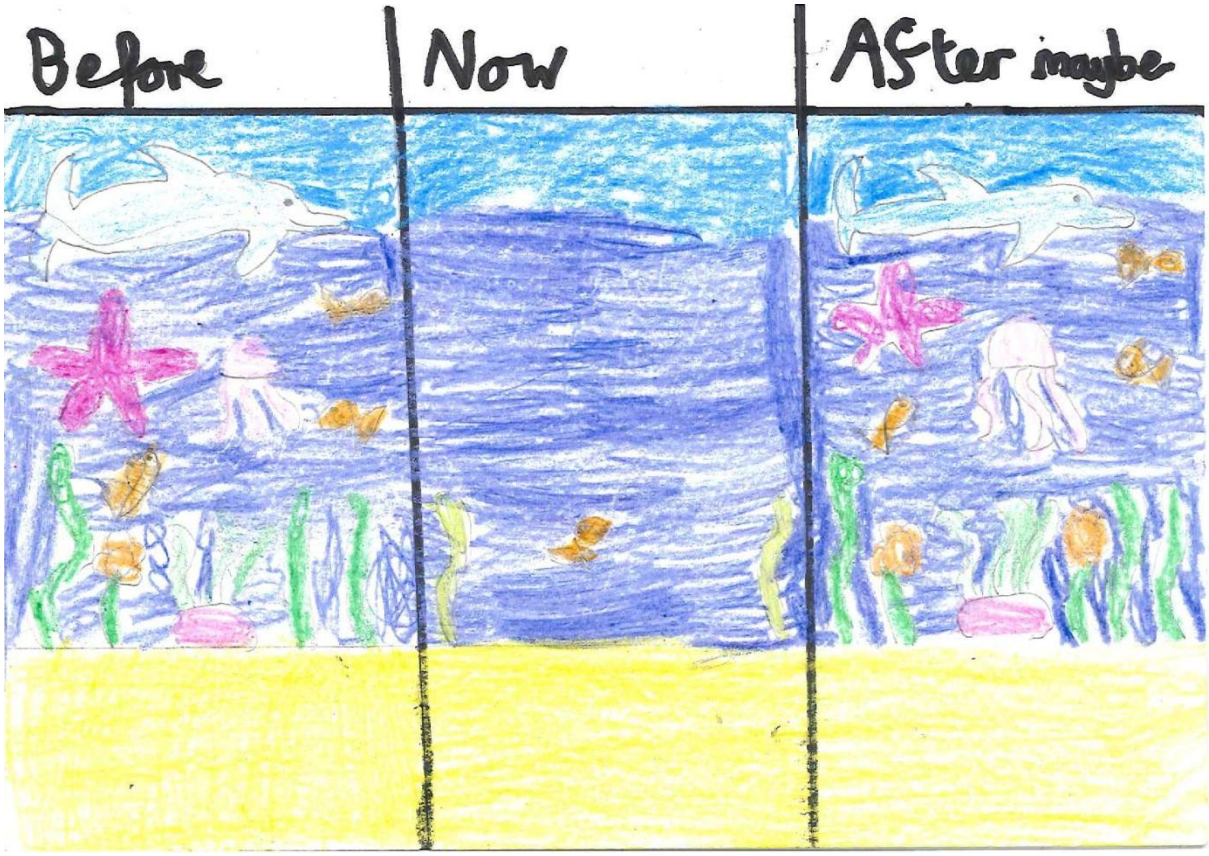

SAVE THE
OCEANS



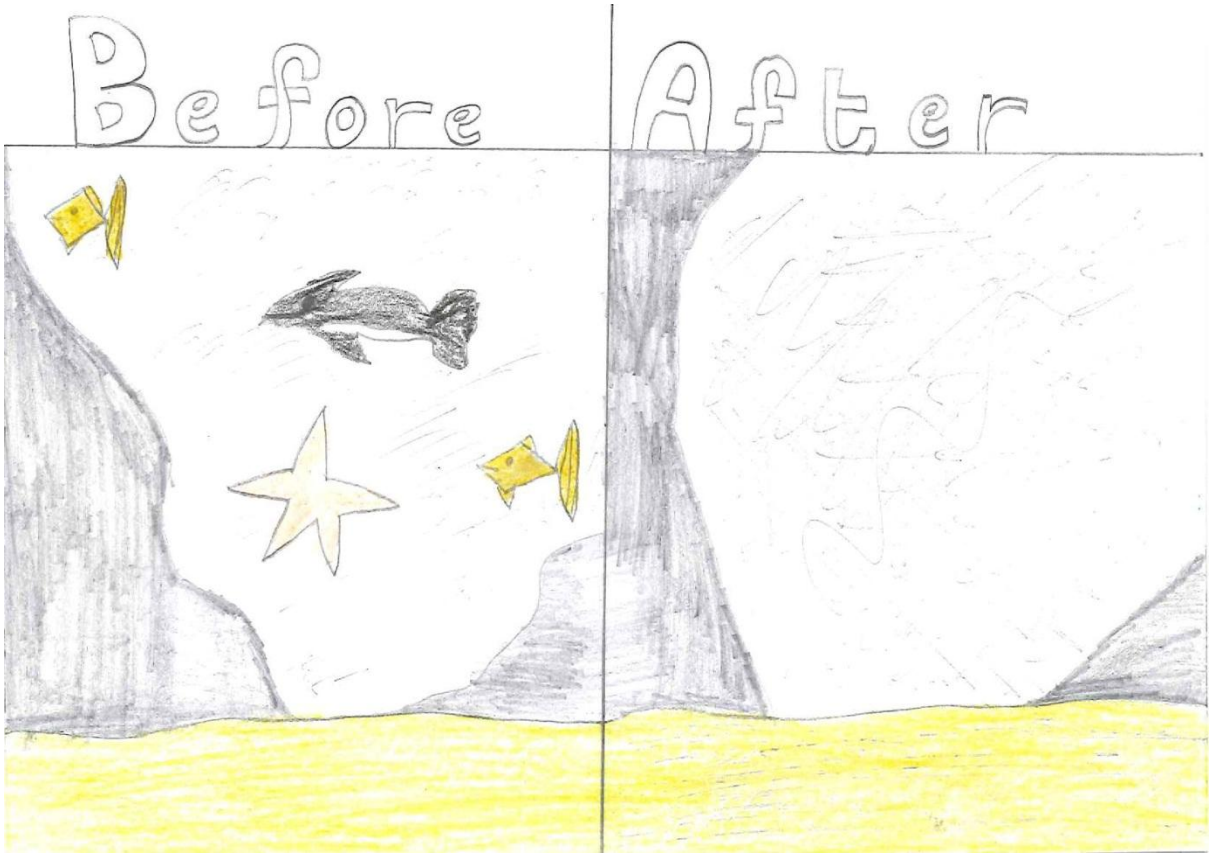



Before
After




Before
Now
After maybe


BRING
THEM BACK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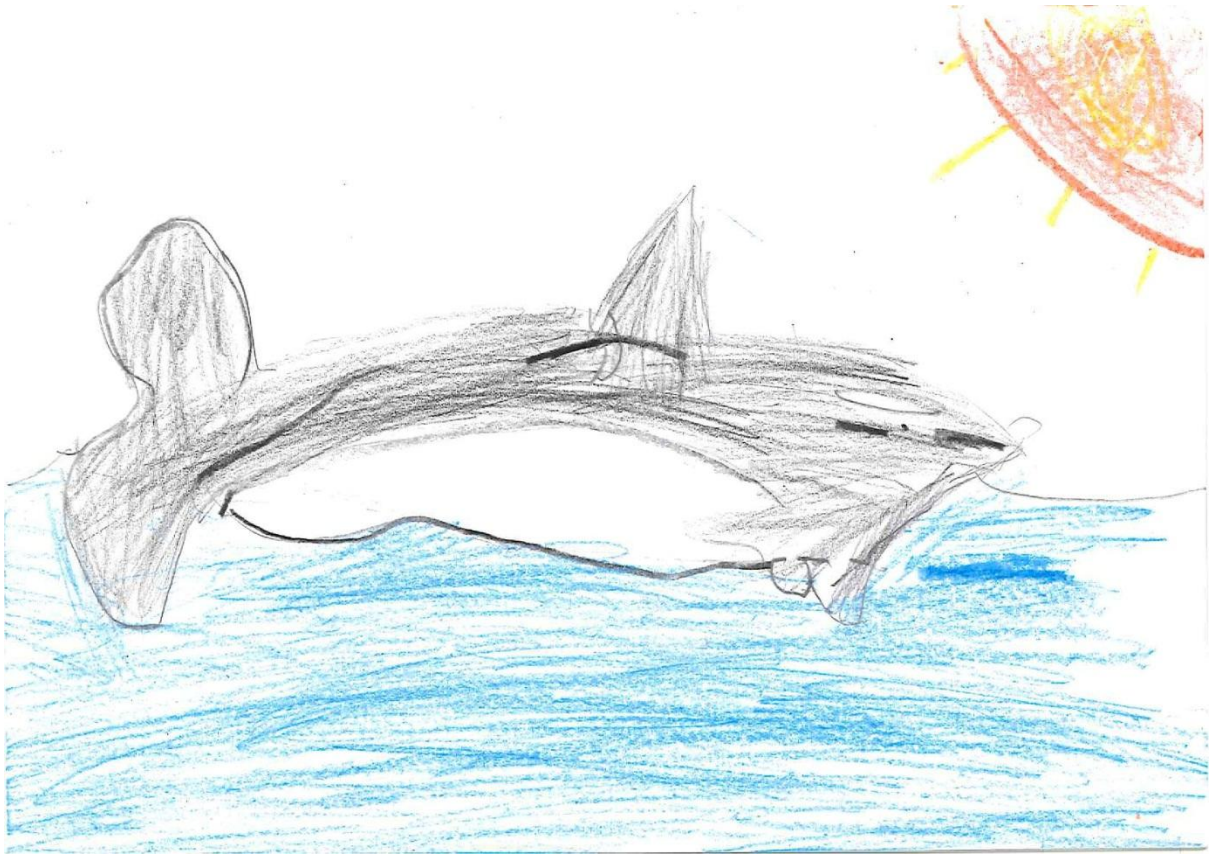


Appendix 5: Report of the Consultation Events

During the consultation a series of drop-in information events were held in various locations throughout Scotland to allow members of the public to meet with Marine Scotland and Scottish Natural Heritage.

A table showing the event locations, dates and estimated number of attendees is included below:

LOCATION	DATE OF MEETING	ESTIMATED ATTENDEES
Wick	18/11/2014 (Tue)	10
Ullapool	19/11/2014 (Wed)	40
Kyleakin	20/11/2014 (Thur)	20
Mallaig	21/11/2014 (Fri)	15
Arran	25/11/2014 (Tue)	35
Ardrossan	26/11/2014 (Wed)	5
Stranraer	27/11/2014 (Thur)	20
Campbeltown	02/12/2014 (Tue)	20
Inveraray	03/12/2014 (Wed)	15
Barra	04/12/2014 (Thur)	3
Oban	10/12/2014 (Wed)	10
Kirkwall	12/11/2014 (Wed)	5
Stornoway	13/11/2014 (Thur)	12
Tobermory	27/01/2015 (Tues)	20

The Tobermory event was cancelled twice due to poor weather conditions before finally taking place on the 27th January 2015.

All of the main points raised at each meeting were recorded and have been compiled in this document. Please note that comments conveyed were made by members of the public who attended the events. Similar views may have been expressed by multiple attendees.

The comments in this appendix do not represent the views of Scottish Minsters, Marine Scotland or Scottish Natural Heritage.

EVENT NOTES

WICK 18/11/2014

- Noss Head management will not affect fishermen as nobody is fishing there at moment anyway with exception of creelers who would not be affected.
- However <10m vessels in the inshore managed areas for trawls and dredgers will be impossible to police and enforce because the pings are only every 2 hours; in between pings they enter protected areas then go out again before the next ping. Small scallopers do not need to keep their AIS on and often turn it off to avoid it being known where they are.
- Only way to police/enforce MPA/SACs is with continuous tracking, every minute.
- They consider small boats to be main danger for marine environment as there are boats continuously going over the same area.
- Boundary should be further out to the 3 degree line to include an important sandbank that supports vast numbers of razorbills and guillemots. There are currently boats from all over Scotland as well as Isle of Man fishing that area for scallops.
- Consider protected areas to be only thing stopping fish from running out and big boats like protected areas as they can fish the edges.
- No electro-fishing in this area.

ULLAPOOL 19/11/2014

WESTER ROSS MPA

- Very strong support for the MPA and wanting to see it well managed.
- Scallop dredging brings no benefit to the local communities. Whereas scallop diving and eco-tourism does.
- Changing the seasonal closure (Gruinard Bay and Little Loch Broom) to a permanent measure may impact on creel fishermen who benefit from fishing in what would be the space between the 2 lines in winter.
- The area around the summer isles, Eilean dubh and Bottle Island should be amalgamated into one.
- Strong support of the Approach 2 measures in the sea lochs (Loch Ewe, Little loch Broom, and Loch Broom)
- A lot of local interest in Loch Ewe, support from all sectors for a full closure to facilitate shellfish and fish stock regeneration.

- Enquiries about impacts of a planned offshore wind farm cable which would run through Little Loch Broom. A feeling that this would offer further protection to the areas adjacent to the cable.
- Comments about the negative impact on the environment of fish farms in the area.
- Scallop dredgers have been sighted fishing in areas with a voluntary agreement in place. No evidence however so no further action can be taken.
- Keen to see Several Orders retained,
- Support for static gear only area opposite Achultibuie.
- Possible Scottish Parliament petition.
- Concern that MPAs would not cover trout and salmon.

LOCHS DUICH, LONG & ALSH MPA

- Length restriction should be applied to dredging to make it the same as the 12m trawling restriction.
- Historic seaweed fishery in this area should perhaps be taken into consideration for further management to prevent this industry restarting.

KYLEAKIN 20/11/2014

LOCHS DUICH LONG & ALSH MPA

- Good support throughout local community for the MPAs. A feeling that the monitoring needs to be collaborative (with local community) and frequent to be effective and to allow for continuing growth of knowledge.
- Interest locally in applying to designate the area around the South Skye islands as a demonstration & research MPA for salmon and sea trout.
- Concern about the detrimental effects fish farms have on the environment.
- Queries about mobile species MPAs.
- In the proposed seasonal fishery area in Loch Alsh it is mostly visiting scallop dredgers within the 1st few weeks of the area opening. They fish very close to the boundary and so monitoring can be difficult.
- The existing licence condition has had a disproportionate effect on smaller vessels who dredged on the shallower edges which are no longer available.
- Concern about insufficient resources for monitoring.

WESTER ROSS MPA

- The measures will affect smaller dredgers most. May be forced to upsize vessel from one operating 4-a-side to a vessel capable of 8-a-side.

SMALL ISLES MPA

- Displacing scallop dredging from here may result in sensitive habitats near Skye coming under increased pressure.
- A number of tows would be affected by the Sound of Canna measures under both approaches. These are used most by smaller vessels.
- Potential for increased gear conflict, creel proliferation and increased unlicensed fishing.

GENERAL COMMENT

- It looks like the measures have been designed to stop scallop dredging.

MALLAIG 21/11/2014

- Fishing industry unhappy about the proposed closures around the small isles as previously agreed closed area only covered the fan mussel beds.
- Interest from local fish farm owners as to the impact upon their business.
- For future events MS should consider dropping flyers in key businesses such as grocers, chandlery, fuel depot etc., as few people read the local newspapers.
- Concerns amongst trawlermen as there more <12m boats fishing in Sound of Canna than the Scotmap data suggests.
- Fishermen would like to see SNH consider allowing fishing in areas between the sea fans in the proposed closed area in the Sound. Their concern is that previous Management Options Paper had no management for northern sea fan and feather star but now there is to maintain consistency with SAC reef habitat management. Their concern is that this is widening the area requiring management. Alternatively to keep the fan and horse mussel beds in Sound of Canna only and look elsewhere in the MPA for other areas to manage the MPA for northern sea fan and feather star.

ARRAN 25/11/2014

SOUTH ARRAN MPA

- Want to see no mobile gear fishing in whole MPA.
- MCO areas should be highly protected but drawn much closer to the actual maerl beds. A buffer of 100m should be acceptable to local static gear fishers.
- Fish stocks, particularly cod, will not recover with such a high intensity of nephrops trawling.
- Approach 3 may deliver spatial management but gives no real control over the amount of effort in the area where mobile fishing would continue.
- The whole Clyde would benefit from at least a half mile limit where no mobile gear fishing takes place.
- Concern that mobile gear management may create a honeypot effect for creel fishing.
- Want to see proper compliance monitoring and enforcement action / prosecution if there are offences committed.
- Would like to see the 3 NM limit reintroduced not only around Arran but around the whole coastline of Scotland. A feeling that the removal of this in the 1980's contributed greatly to declining fish stocks.
- Would like to see a wider variety of commercial fish.
- Would like to see greater opportunities for angling.
- Closures/restrictions need to be measures so that the difference made is clear.
- Concerns about the ability to ensure compliance.
- Desire to see the proposed MPA closed completely to mobile gear fishing.

ARDROSSAN 26/11/2014

- Ecotourism could improve in rural areas with healthy marine environment. Could have increased kayaking, diving, snorkelling, angling etc.
- People retire on Arran and like things not to change and want idyllic setting. They can be upset by fishing vessels close to shore not realising that this has happened for many years.
- Hunterston lagoon is important for terns and population increasing. Speculation that sandeels are more plentiful in the Clyde than in previous years.
- Fish stocks were overfished and fishing methods were too efficient.

STRANRAER 27/11/2014

LUCE BAY SAC

- Recreational sailors pleased that the management will not affect them. Supportive of Scotland's seas being well managed.
- Creel fishermen work in partnership with local scallop industry.
- Ensuring that the local economy thrives is the primary consideration, not protection of the marine environment.
- Something like Approach 3 would probably be best for fishermen but would require some modification. The proposed daily curfew will affect vessels that are covered by Western waters effort regime, but not others. This would be an unfair solution. Some form of permit scheme may be better.
- Scallops tend to reach a high abundance on a 7-10 year cycle; a few years ago there were a lot more scallops and at moment there is a bit of a dip in numbers.
- Luce Bay is never the 1st fishing ground of choice for scallop fishermen. They only operate there when they are unable to access other grounds due to prevailing conditions.
- Areas of kelp and cobble reef in Luce Bay have been flattened buy dredgers. This has caused a decline in fish numbers where were found in the reef areas. This has caused less anglers to visit the area.
- Species such as Tope much rarer these days. Speculation that electro-fishing for razorfish is affecting them.
- Razorfish fishermen are being threatening towards others which is creating a lot of concern in the area.
- Fishermen feel angry at what they consider to be lies being told by the environmental NGOs about the impact of dredging and other fishing on the environment.

LOCH SUNART TO SOUND OF JURA MPA

- Sea anglers believe skate need safe areas in the shallows for them at night so should ensure no boats towing at night in shallows.

OTHER

- Concerns over an effluent pipeline that is going into Loch Ryan from a creamery could damage the native oyster population. Concern that there has not been contact from SEPA regarding this and concern over what may be going into the lobsters and whether it remains safe to eat.

CAMPBELTOWN 02/12/2014

SOUTH ARRAN MPA

- Lots of complaints about the likelihood of prawn ground being lost. Concern that up to 70% of income would be lost. Concern also that the non-affiliated vessels would be hardest hit. The proposed Designated Fishing Areas for trawling are very important to local trawlers. Welcome the proposed 100 GRT restriction for these areas.
- The seabed around South Arran changes all the time and changes from mud to sand and sandy mud. Certain closed areas around S. Arran may be difficult to navigate and may cause boats to be blown into some the closed areas.
- Extra data reported around NTZ in Arran that makes the VMS data seem more concentrated than it is.
- Fishermen think SG want to close whole of Clyde eventually!
- South Arran proposals will not make too much impact on fishing in general, but will hit a few individuals quite hard.
- West coast vessels would like a reduction of large boats in same way as there is a reduction of them on east coast.

UPPER LOCH FYNE AND LOCH GOIL MPA

- The upper section of Upper Loch Fyne has an area where the navy have dummy mines. Therefore no trawling takes place which makes the 2b approach designated trawl area worthless to trawlers. With some adjustments approach 2a could work well.
- The closed part in the middle of Upper Loch Fyne may not be right for fireworks anemone as fishermen think it is too deep.
- Upper Loch Fyne - Possibility that the logbooks may be off slightly as close to edge of the ICES rectangle. Some may have been logging where their catch against the other rectangle that they spend more time in over the year.

GENERAL

- A number of complaints about the approach taken by SSE to the mainland Jura cable.
- Concerns that the minimum landing size for prawns wasn't being adhered to. Concerns that compliance wasn't picking this up. Assertion that vessels had large numbers of Pilipino crew men who spending all of their time tailing undersized prawns.
- Prawn fishing effort by vessels from out with the Clyde had increased fishery may only last a few more years if undersized landings are not stopped.
- Should be minimum landing size increased to be same as everyone else for nephrops as everyone wants it – should not be taking all the small prawns out of the sea. Also would help the fishermen make a better living.
- The trend for bigger vessels fishing in the Clyde is causing significant concern. The gear is bigger and heavier. Therefore covering far more ground in one tow. Query as to where the ICES 6a effort is coming from.
- Feeling that the 70ft length restriction is now outdated and needs to include a power limit. This would help the smaller vessels who are feeling squeezed out of their traditional grounds.
- Lack of protection for local Clyde fishing communities
- Concerns from fishermen regarding run-off from fishfarms; fish farms end up with a lot of dead fish that pollute the environment.
- At moment there is the most marine life fishermen have ever seen in Clyde. Seal numbers are increasing who are eating all the fish! So the Clyde cannot be as devoid as life as some groups say if seals are increasing.
- Licence to shoot seals is only for fish farmers and river basin managers. Question over what is a sustainable seal population.
- Campbeltown relies on windfarms, farming and fishing.

INVERARAY 03/12/2014

UPPER LOCH FYNE & LOCH GOIL MPA

- Upper Loch Fyne would be better with lesser spatial measures and greater general restrictions such as winter only trawling, no twin rig, and restricted to even smaller vessels than 75 tonnes. This would recognise its importance to the smaller vessels in bad weather.
- There are too many creels in the water and there should be a balance in limitations on trawling and creeling. Creel vessels often see better catches after some trawling has taken place.
- People say there are no fish in the loch for anglers. The trouble is they come in summer when the fish aren't present. During winter they are there and this was recently proven by an angling party who recently caught significant quantities of cod in the loch.
- Would like to see whole of Loch Fyne and Loch Goil closed to mobile gear. Loch Goil has fish with concave bellies as no food for them after trawls.
- MPAs need governance; they cannot be self-governed or voluntary– important to make sure policing done properly.
- Juvenile fish getting caught in fish farms
- Loch Long and Fyne have lots of sandeel and sprat, but sometimes get jellyfish swarms and anglers think jellyfish are eating leftover food from fish farms.
- High numbers of sea-stars but less juvenile fish

GENERAL

- Anglers have seen collapse in numbers of fish, which is driving people away and has seen loss in number of fishing shops. Luce Bay for example is empty of fish for anglers
- MPAs should provide full protection not just in certain areas for individual features.
- Would like to see 3 mile limit come back or even 1 mile limit
- Predators are feeding on jellyfish not fish as cod etc are not eating jellyfish – increase in dog whelks too that are eating fish farm effluent and food.
- Concern that SEPA and MS Compliance not doing enough.

BARRA 04/12/2014

- One local creel boat working within East Mingulay SAC, this is the main area for working in the first half of the year.
- Works about 500 creels, 500 elsewhere. Doesn't fish on the reef but can be close to the buffer boundary.
- A bigger nomadic creel boat fishes in the area occasionally.
- Safe to put creels down here as very little or no mobile gear boats working in this area.
- It is unclear why fishing at such low levels at East Mingulay could even have a risk of likely significant effect.
- It would appear that the change in policy regarding application of Article 6 of the Habitats Directive to fishing is a direct result of pressure applied to DEFRA by the Marine Conservation Society and ClientEarth.

OBAN 10/12/2014

- Creelers happy with what is being proposed for Loch Sunart and Sound of Jura.
- Recreational boaters concerned as to whether there will be restrictions for anchorages, though there is very little of concern for anchorages with exception of Whiting Bay.
- Enquiries about the process to designate Loch Etive as an MPA.
- Small Isles MPA proposals likely to hit smallest boats in the South Minch hardest. They depend on being able to fish in the shelter of the islands and move around according to the prevailing conditions.
- Fishermen disappointed with the change in SNH advice regarding Northern Seafan and Sponge Communities having engaged in the displacement study and other meetings

KIRKWALL 17/12/2014

- Scallop dredgers do not fish in either the MPA or SAC and support the management proposed so long as there is no creep out from the site boundary.
- Fishermen would like definitive maps of where they can / cannot fish once measures are in place so that they can stay compliant.
- The myriad of fisheries regulations and "paperwork" has become too complex and would benefit from simplification.

STORNOWAY 18/12/2014

- Concern that the existing fisheries management of Broad Bay was going to be revoked.
- Concern that the existing fisheries measures in Broad Bay were not achieving its aim, and should be revoked.
- The Dorney Sound at Wester Ross MPA is important to Western Isles scallop dredgers
- The zonal management proposal for East Mingulay is a pragmatic solution, and should be an exemplar of what can be done when fishers knowledge is incorporated.
- Western Isles fishermen have become more relaxed about MPAs over the last 18 months due to being engaged in various meetings in that period.
- Interest in the next steps with community-led management of Sound of Barra.
- A number of questions about the landings obligation, about which separate contact would be made
- Question about whether the Halibut fish farm was still operational.

TOBERMORY 27/01/2015

- Concern that Marine Scotland would allow mobile gear fishing in Marine Protected Areas. Assertion that, by definition, such sites should be fully protected. Mobile gear fishing in some areas within a MPA boundary would not constitute protection.
- Concerns about how scallop diving might be treated.
- Concerns also about moorings and whether they would still be accessible after designation.
- Concern about the impact of fish farms. The waste and chemicals were harmful to the environment. The fish farms were Norwegian owned. Fish farms also caused problems for salmon and sea trout.
- The Firth of Lorn was full of scallops. Could spat or mature scallops be transferred/ relocated to adjacent areas. Scallop spat transfer, in particular, had been mooted for some time. Suitable seabed habitat and water temperature may be relevant.
- Concerns about illegal fishing and whether MPAs would help to deter.
- Fishing interests unlikely to comply with MPA management. Likely therefore that more stringent would be required.

Appendix 6: Process for Implementation of Measures

1. Marine Conservation Orders

1.1. Scottish Ministers have the power to make Marine Conservation Orders (MCOs) to further the stated conservation objectives of Marine Protected Areas (MPAs). Where there is an overlapping or adjoining Special Area of Conservation (SAC) then the order can also protect this site.

1.2. When intending to make a MCO the Scottish Ministers must serve notice of their proposal. A draft of the Order must be made available for inspection. Scottish Ministers may also invite representations from any interested person.

1.3. In order to implement the proposed management measures the Scottish Ministers intend to make four Marine Conservation Orders. They are for the following sites;

- Loch Sunart to Sound of Jura MPA (This includes the Firth of Lorn SAC but not the Loch Sunart MPA /SAC).
- Small Isles MPA
- South Arran MPA
- Wester Ross MPA

1.4. Drafts of these orders have been published, and Scottish Ministers now invite written representations to be made. These representations should be made no later than 23:59 hours on 12 July 2015. Please see www.gov.scot/Topics/marine/marine-environment/mpanetwork/MPAMGT/protectedareasmgt/conservationorders for further details.

1.5. The intention is for these 4 orders to be laid before the Scottish Parliament in late August so that they take effect from 01 October 2015.

1.6. Each of these Orders will be accompanied by a Business and Regulatory Impact Assessment (BRIA) which will address the points made in consultation responses regarding costs and benefits associated with each site.

2. Order(s) under the Inshore Fishing (Scotland) Act 1984

2.1. Scottish Ministers have the power to use the provisions of the Inshore (Fishing) Scotland Act 1984 to manage fishing activity to protect the marine environment. Scottish Ministers intend to deliver the rest of the measures using these powers.

2.2. The number of orders is to be determined but they will cover the following sites;

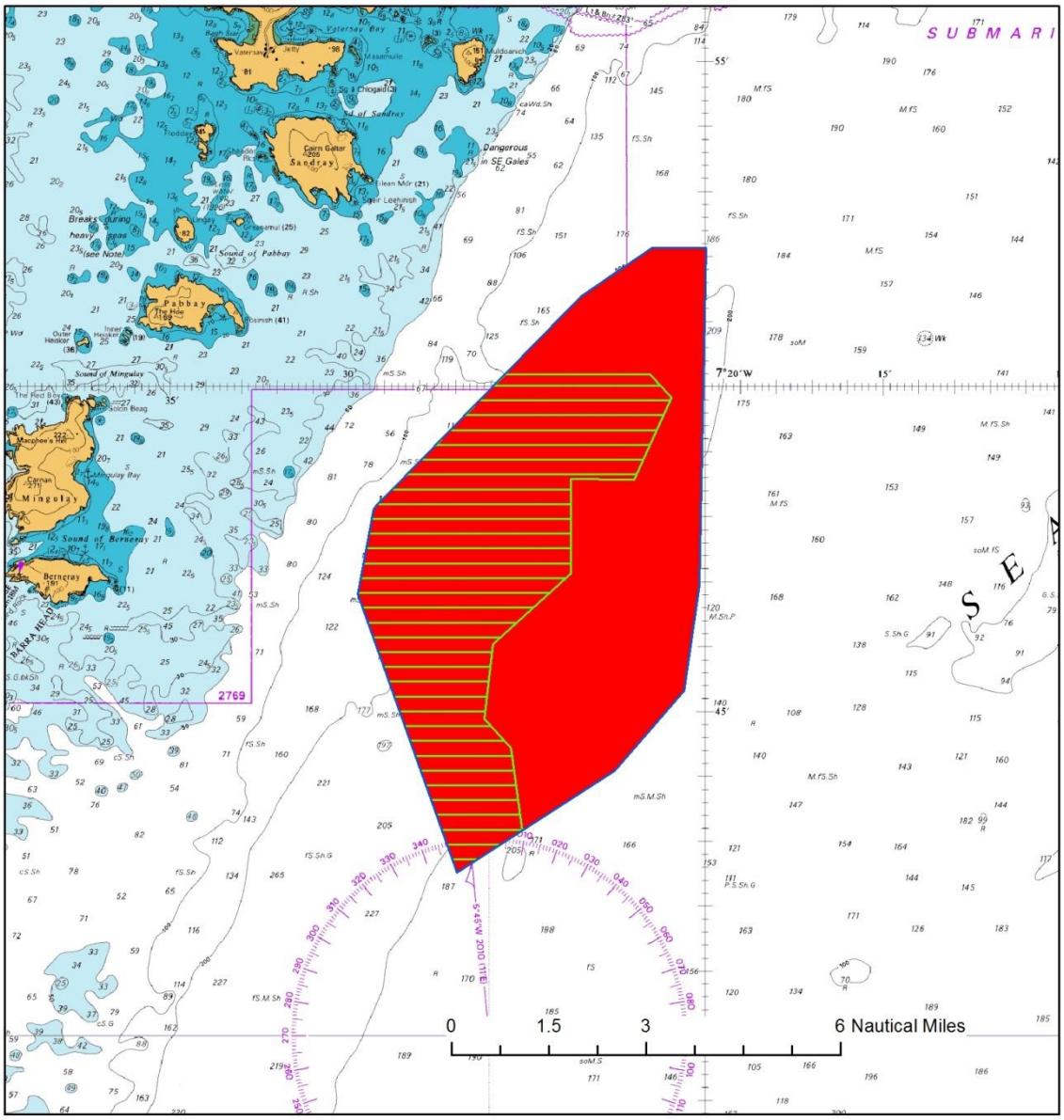
- East Mingulay SAC
- Loch Creran MPA / SAC
- Loch Laxford SAC
- Loch Sunart MPA / SAC
- Lochs Duich Long & Alsh MPA / SAC
- Luce Bay SAC
- Noss Head MPA
- Sanday SAC
- St Kilda SAC
- Treshnish Isles SAC
- Upper Loch Fyne & Loch Goil MPA
- Wyre & Rousay Sounds MPA

2.3. With the exception of Luce Bay SAC the intention is for any orders to be laid before the Scottish Parliament in late August so that they take effect from 01 October 2015. For Luce Bay SAC the intention is to lay an Order in mid-September to take effect from 01 November 2015.

2.4. Each of these Orders will be accompanied by a Business and Regulatory Impact Assessment (BRIA) which will address the points made in consultation responses regarding costs and benefits associated with each site.

Appendix 7: East Mingulay SAC Management Measures

Figure A7.1 – Map of proposed measures



East Mingulay SAC

- SAC Boundary
- No demersal static gear
- Management area

Within the red area no suction dredging, mechanical dredging, beam trawling, demersal trawling, or seine netting is permitted.

Within the green hatched area no creels, set nets, or long lines are permitted.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.75'N Scale 1:150,000

Table A7.1 – Site level assessment of measures[1]

East Mingulay SAC	Area (KM^2)	As %
Site	114.89	
Protected from creels, set nets and long lines	57.72	50%
Protected from mechanical dredge, suction dredge, beam trawls, and demersal trawls	114.89	100%

Table A7.2 – Qualifying feature assessment[2] - Protected from creels, set nets and long lines

SAC Qualifying Feature	Feature Records		Records Included	% Included
Lophelia pertusa reefs	Area (km^2)	3.61	3.61	100%
	Count	6	6	100%
Stony Reefs	Area (km^2)	11.78	6.19	53%

Table A7.3 – Qualifying feature assessment - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

SAC Qualifying Feature	Feature Records		Records Included	% Included
Lophelia pertusa reefs	Area (km^2)	3.61	3.61	100%
	Count	6	6	100%
Stony reefs	Area (km^2)	11.78	11.78	100%

[1] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum

[2] Qualifying feature assessment uses habitat data provided by Scottish Natural Heritage

Table A7.4 – Priority Marine Feature Added Value Assessment - Protected from creels, set nets and long lines

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud (Fireworks anemone)	Count	12	5	41.7%
Burrowed mud (Tall seapen)	Count	5	2	40%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	2	0	0%
Northern feather star	Count	7	2	28.6%
Northern sea fan and sponge communities	Area (km^2)	7.02	7.02	100%
	Count	3	2	66.7%
White cluster anemone	Count	12	9	75%

Table A7.5 – Priority Marine Feature Added Value Assessment - Protected from mechanical dredge, suction dredge, beam trawls, and demersal trawl

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud (Fireworks anemone)	Count	12	12	100%
Burrowed mud (Tall seapen)	Count	5	5	100%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	2	2	100%
Northern feather star	Count	7	7	100%
Northern sea fan and sponge communities	Count	3	3	100%
	Area (km^2)	7.02	7.02	100%
White cluster anemone	Count	12	12	100%

Table A7.6 – Other Marine Habitat Added Value Assessment[3] - Protected from creels, set nets and long lines

Other Habitats	Feature Records		Records Included	% Included
Offshore circalittoral mixed sediment communities	Count	5	3	60%
Offshore circalittoral mud communities	Count	3	1	33%

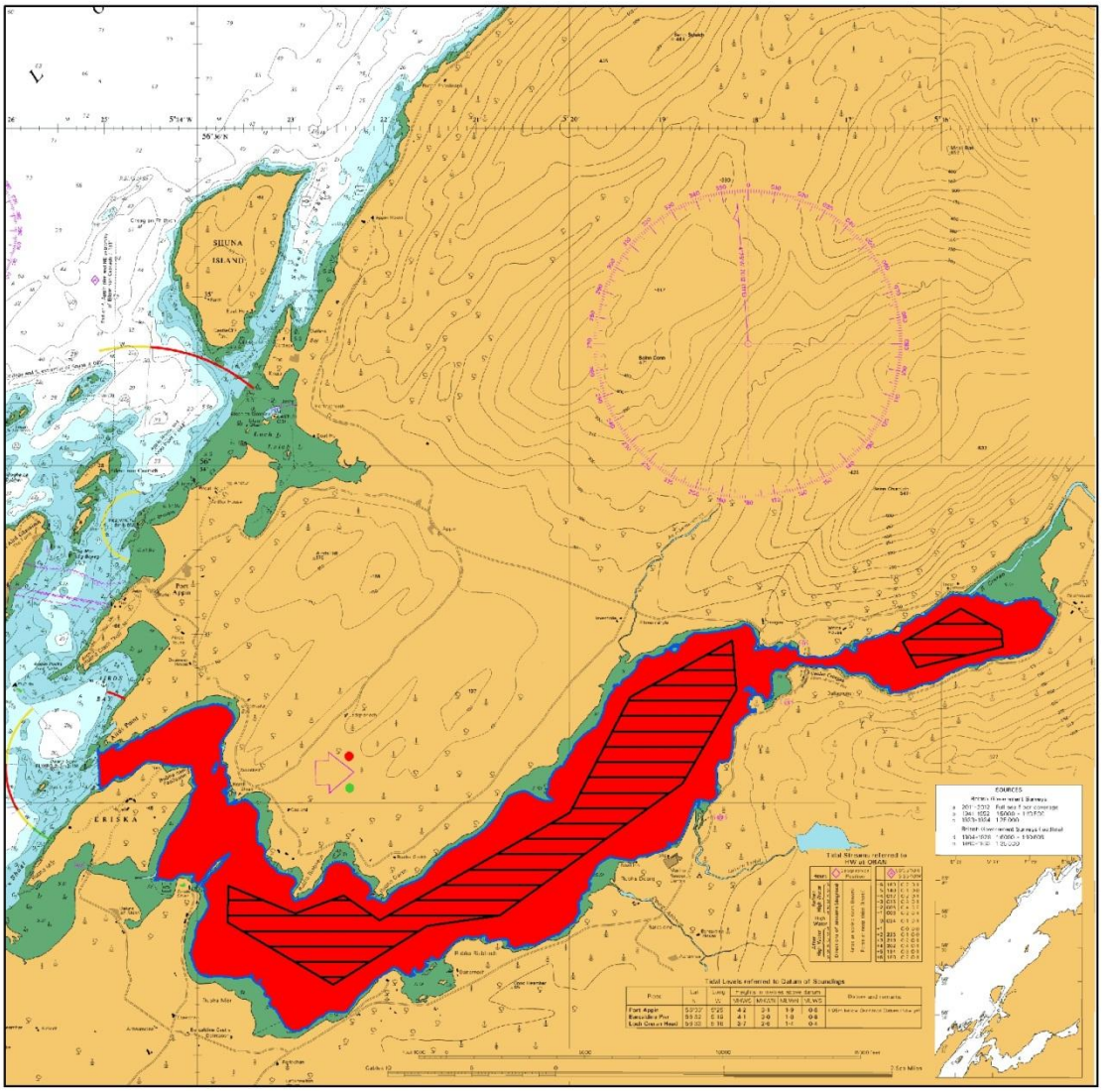
Table A7.7 – Other Marine Habitat Added Value Assessment - Protected from mechanical dredge, suction dredge, beam trawls, and demersal trawls

Other Habitats	Feature Records		Records Included	% Included
Offshore circalittoral mixed sediment communities	Count	5	5	100%
Offshore circalittoral mud communities	Count	3	3	100%

[3] Priority Marine Feature and other marine habitat value added assessments used data extracted from Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 8: Loch Creran MPA/SAC Management Measures

Figure A8.1 – Map of proposed measures



Loch Creran MPA/SAC

- MPA / SAC boundary
- derogated creel area
- management area

Within the red area there will be no fishing by any method other than rod and line.
By way of derogation creel fishing will be permitted in the black hatched areas.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.5'N Scale 1:60,000

Table A8.1 – Site level assessment of measures[4]

Loch Creran MPA / SAC	Area (KM^2)	As %
Site	12.26	
Protected from creels	7.77	63.4%
Protected from demersal trawls, mechanical dredge, long lines, set nets, suction dredge and beam trawls	12.26	100%

Table A8.2 – Qualifying / protected feature assessment[5] - Protected from set nets, long lines, suction dredge, beam trawl, mechanical dredge, and demersal trawl

MPA Protected Feature / SAC Qualifying Features	Feature Records		Records Included	% Included
Flame shell beds	Area (km^2):	0.19	0.19	100%
	Count	78	78	100%
Horse mussel reefs	Area (km^2):	0.13	0.13	100%
	Count	21	21	100%
Serpulid reefs	Area (km^2):	0.93	0.93	100%
	Count	3612	3612	100%
Stony Reefs	Area (km^2):	1.18	1.18	100%

Table A8.3 – Qualifying / protected feature assessment - Protected from creels

MPA Protected Feature / SAC Qualifying Features	Feature Records		Records Included	% Included
Flame shell beds	Area (km^2):	0.19	0.19	100%
	Count	78	78	100%
Horse mussel reefs	Area (km^2):	0.13	0.13	100%
	Count	21	21	100%
Serpulid reefs	Area (km^2):	0.93	0.93	100%
	Count	3612	3612	100%
Stony Reefs	Area (km^2):	1.18	1.175	99.6%

[4] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum

[5] Uses additional habitat data provided by Scottish Natural Heritage and Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A8.4 – Priority Marine Feature Added Value Assessment[6] - Protected from set nets, long lines, suction dredge, beam trawl, mechanical dredge, and demersal trawl

Other PMFs	Feature Records		Records Included	% Included
Blue mussel beds	Area (km^2):	5	5	100%
Burrowed mud	Count	1	1	100%
Burrowed mud (Fireworks anemone)	Count	4	4	100%
Burrowed mud (Mud volcano worms)	Count	1	1	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	19	19	100%
Kelp and seaweed communities on sublittoral sediment	Count	5	5	100%
Low or variable salinity habitats	Count	8	8	100%
Native oysters	Count	1	1	100%
Ocean quahog	Count	5	5	100%
Seagrass beds	Area (km^2):	0.93	0.93	100%
Tide-swept algal communities	Count	1	1	100%

Table A8.5 – Priority Marine Feature Added Value Assessment[6] - Protected from creels

Other PMFs	Feature Records		Records Included	% Included
Blue mussel beds	Area (km^2):	5	5	100%
Burrowed mud	Count	1	1	100%
Burrowed mud (Fireworks anemone)	Count	4	2	50%
Burrowed mud (Mud volcano worms)	Count	1	1	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	19	12	63.2%
Kelp and seaweed communities on sublittoral sediment	Count	5	5	100%
Low or variable salinity habitats	Count	8	7	87.5%
Native oysters	Count	1	1	100%
Ocean quahog	Count	5	5	100%
Seagrass beds	Area (km^2):	0.93	0.93	100%
Tide-swept algal communities	Count	1	1	100%

[6] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A8.6 – Other Marine Habitat Added Value Assessment[7] - Protected from set nets, long lines, suction dredge, beam trawl, mechanical dredge, and demersal trawl

Other Habitats	Feature Records		Records Included	% Included
Mudflat / Sandflat communities	Count	6	6	100%
Sandbank communities	Count	6	6	100%
Circalittoral sandy mud communities	Count	7	7	100%
Infralittoral fine mud communities	Count	14	14	100%
Littoral mixed sediment communities	Count	1	1	100%
Sublittoral mud communities in variable salinity	Count	1	1	100%
Circalittoral mixed sediment communities	Count	9	9	100%
Infralittoral mixed sediment communities	Count	1	1	100%

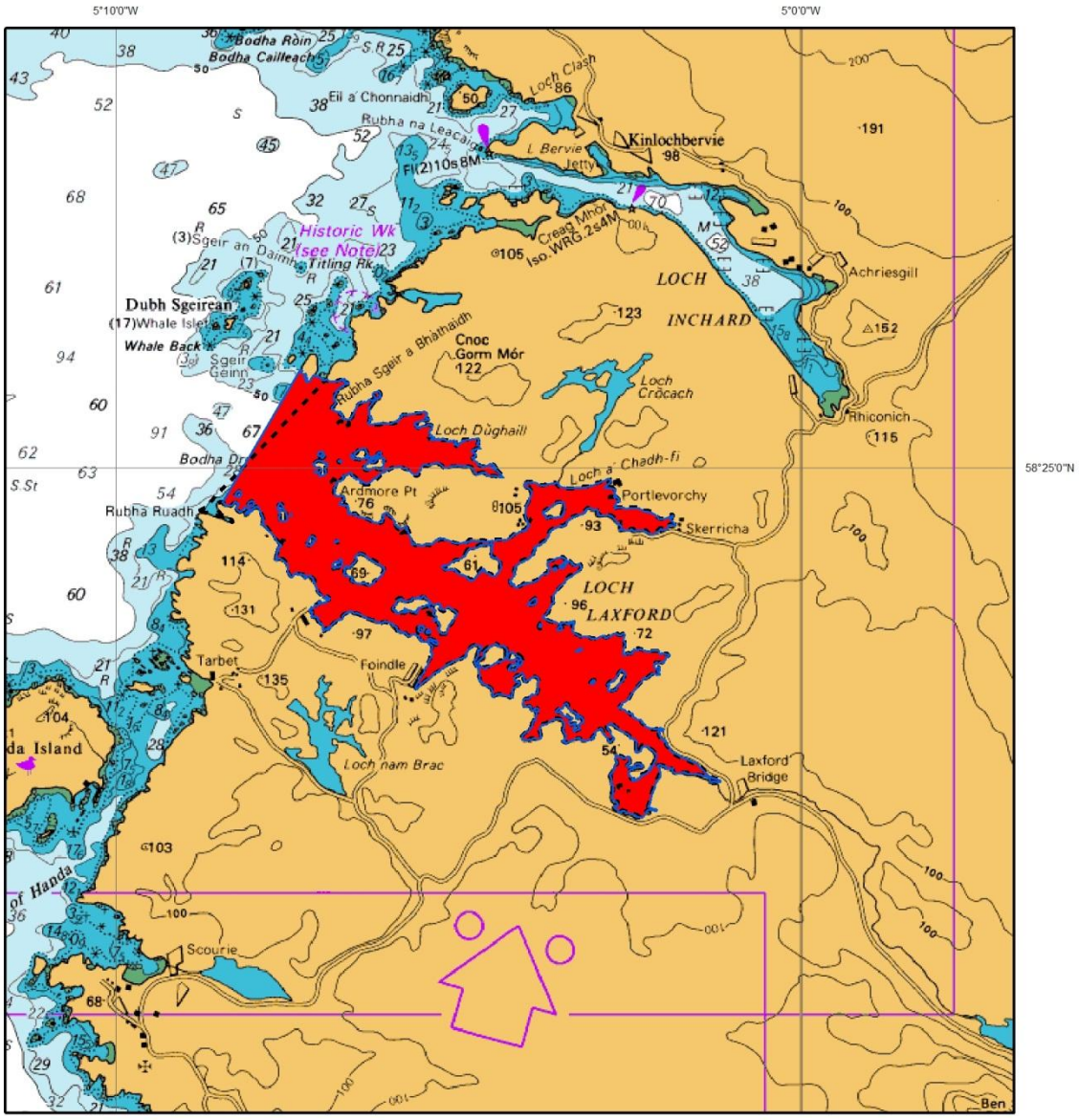
Table A8.7 – Other Marine Habitat Added Value Assessment[7] - Protected from creels

Other Habitats	Feature records		Records included	% included
Mudflat / Sandflat communities	Count	6	6	100%
Sandbank communities	Count	6	6	100%
Circalittoral sandy mud communities	Count	7	7	100%
Infralittoral fine mud communities	Count	14	13	93%
Littoral mixed sediment communities	Count	1	1	100%
Sublittoral mud communities in variable salinity	Count	1	1	100%
Circalittoral mixed sediment communities	Count	9	8	89%
Infralittoral mixed sediment communities	Count	1	1	100%

[7] using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 9: Loch Laxford SAC Management Measures

Figure A9.1 – Map of proposed measures



Loch Laxford SAC

SAC Boundary

existing seasonal closure

management area

Existing seasonal closure to be revoked

Within the red area no suction dredging, mechanical dredging, beam trawling, or demersal trawling is permitted.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 58.4'N Scale 1:75,000

Table A9.1 – Site level assessment of measures[8]

Loch Laxford SAC	Area (KM^2)	As %
Site	12.21	
Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls	12.21	100%

Table A9.2 – Qualifying feature assessment[9] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

SAC Qualifying Feature	Feature Records		Records Included	% Included
Blue mussel beds	Area (km^2):	0.01	0.01	100%
	Count	1	1	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	36	36	100%
Burrowed mud (Tall seapen)	Count	1	1	100%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	5	5	100%
European spiny lobster	Count	1	1	100%
Horse mussel beds	Count	1	1	100%
Inshore deep mud with burrowing heart urchins	Count	2	2	100%
Intertidal mudflats	Count	1	1	100%
Kelp and seaweed communities on sublittoral sediment	Count	46	46	100%
Kelp beds	Count	48	48	100%
Low or variable salinity habitats	Count	2	2	100%
Maerl beds	Area (km^2):	0.02	0.02	100%
	Count	18	18	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	1	1	100%
Northern feather star	Count	1	1	100%
Northern sea fan and sponge communities	Count	5	5	100%
Ocean quahog	Count	7	7	100%
Sea loch egg wrack beds	Count	3	3	100%
Stony Reefs	Area (km^2):	3.85	3.85	100%
Tide-swept algal communities	Count	4	4	100%
Tide-swept algal communities and Kelp beds	Count	1	1	100%

[8] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum

[9] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 10: Loch Sunart to Sound of Jura MPA Management Measures

Figure A10.1 – Map of proposed measures – Loch Sunart MPA / SAC

Loch Sunart MPA / SAC

derogated area

Management area

Within the red area no suction dredge, mechanical dredge, beam trawl, demersal trawl, bottom set nets, long lining, or creel fishing is permitted.

By way of derogation creel fishing is permitted in the area with black hatching.
This is the whole Loch except Loch Teacuis.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.7'N Scale 1:150,000

Table A10.1 – Site level assessment of measures[10]

Loch Sunart MPA / SAC	Area (KM^2)	As %
Site	48.8	
Protected from creels	1	2%
Protected from demersal trawls, mechanical dredge, long lines, set nets, suction dredge and beam trawls	48.8	100%

Table A10.2 – Qualifying / Protected feature assessment[11] - Protected from set nets, long lines, demersal trawls, mechanical dredge, suction dredge and beam trawls

MPA Protected Feature / SAC Qualifying Feature	Feature Records		Records Included	% Included
Common skate	Count	2	2	100%
Flame shell beds	Area (km^2)	0.85	0.85	100%
	Count	43	43	100%
Northern feather star	Area (km^2)	0.46	0.46	100%
	Count	86	86	100%
Serpulid aggregations	Area (km^2)	0.17	0.17	100%
	Count	89	89	100%
Stony Reef	Area (km^2)	19.55	19.55	100%

Table A10.3 – Qualifying / Protected feature assessment[11] - Protected from creels

MPA Protected Feature / SAC Qualifying Feature	Feature Records		Records Included	% Included
Serpulid aggregations	Area (km^2)	0.17	0.17	100%
	Count	89	89	100%

[10] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum

[11] Qualifying feature assessment uses habitat data provided by Scottish Natural Heritage and Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A10.4 – Priority Marine Feature Added Value Assessment[12] - Protected from set nets, long lines, demersal trawls, mechanical dredge, suction dredge and beam trawls

Other PMFs	Feature Records		Records Included	% Included
Blue mussel beds	Count	2	2	100%
Burrowed mud (Fireworks anemone)	Count	16	16	100%
Burrowed mud (Mud burrowing amphipod)	Count	1	1	100%
Burrowed mud (Mud volcano worms)	Count	3	3	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	13	13	100%
Burrowed mud (Tall seapen)	Count	48	48	100%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	39	39	100%
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	3	3	100%
European spiny lobster	Count	4	4	100%
Horse mussel beds	Count	8	8	100%
Kelp and seaweed communities on sublittoral sediment	Count	54	54	100%
Kelp beds	Count	20	20	100%
Low or variable salinity habitats	Count	32	32	100%
Maerl beds	Count	1	1	100%
Native oysters	Count	1	1	100%
Northern sea fan and sponge communities	Count	29	29	100%
Northern sea fan and sponge communities	Count	38	38	100%
Ocean quahog	Count	7	7	100%
Sea loch egg wrack beds	Count	4	4	100%
Seagrass beds	Count	2	2	100%
Tide-swept algal communities	Count	6	6	100%
Tide-swept algal communities and Kelp beds	Count	2	2	100%
White cluster anemone	Count	15	15	100%

[12] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A10.5 – Priority Marine Feature Added Value Assessment[13] - Protected from creels

Other PMFs	Feature Records		Records Included	% Included
Blue mussel beds	Count	2	0	0%
Burrowed mud (Fireworks anemone)	Count	16	2	12.5%
Burrowed mud (Mud burrowing amphipod)	Count	1	0	0%
Burrowed mud (Mud volcano worms)	Count	3	0	0%
Burrowed mud (Seapens and burrowing megafauna)	Count	13	0	0%
Burrowed mud (Tall seapen)	Count	48	1	2.1%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	39	1	2.5%
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	3	0	0%
European spiny lobster	Count	4	0	0%
Horse mussel beds	Count	8	1	12.5%
Kelp and seaweed communities on sublittoral sediment	Count	54	8	14.8%
Kelp beds	Count	20	0	0%
Low or variable salinity habitats	Count	32	1	3.1%
Maerl beds	Count	1	0	0%
Native oysters	Count	1	0	0%
Northern sea fan and sponge communities	Count	29	0	0%
Northern sea fan and sponge communities	Count	38	0	0%
Ocean quahog	Count	7	0	0%
Sea loch egg wrack beds	Count	4	0	0%
Seagrass beds	Count	2	0	0%
Tide-swept algal communities	Count	6	1	16.7%
Tide-swept algal communities and Kelp beds	Count	2	0	0%
White cluster anemone	Count	15	0	0%

[13] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A10.6 – Other Marine Habitat Added Value Assessment[14] - Protected from set nets, long lines, demersal trawls, mechanical dredge, suction dredge and beam trawls

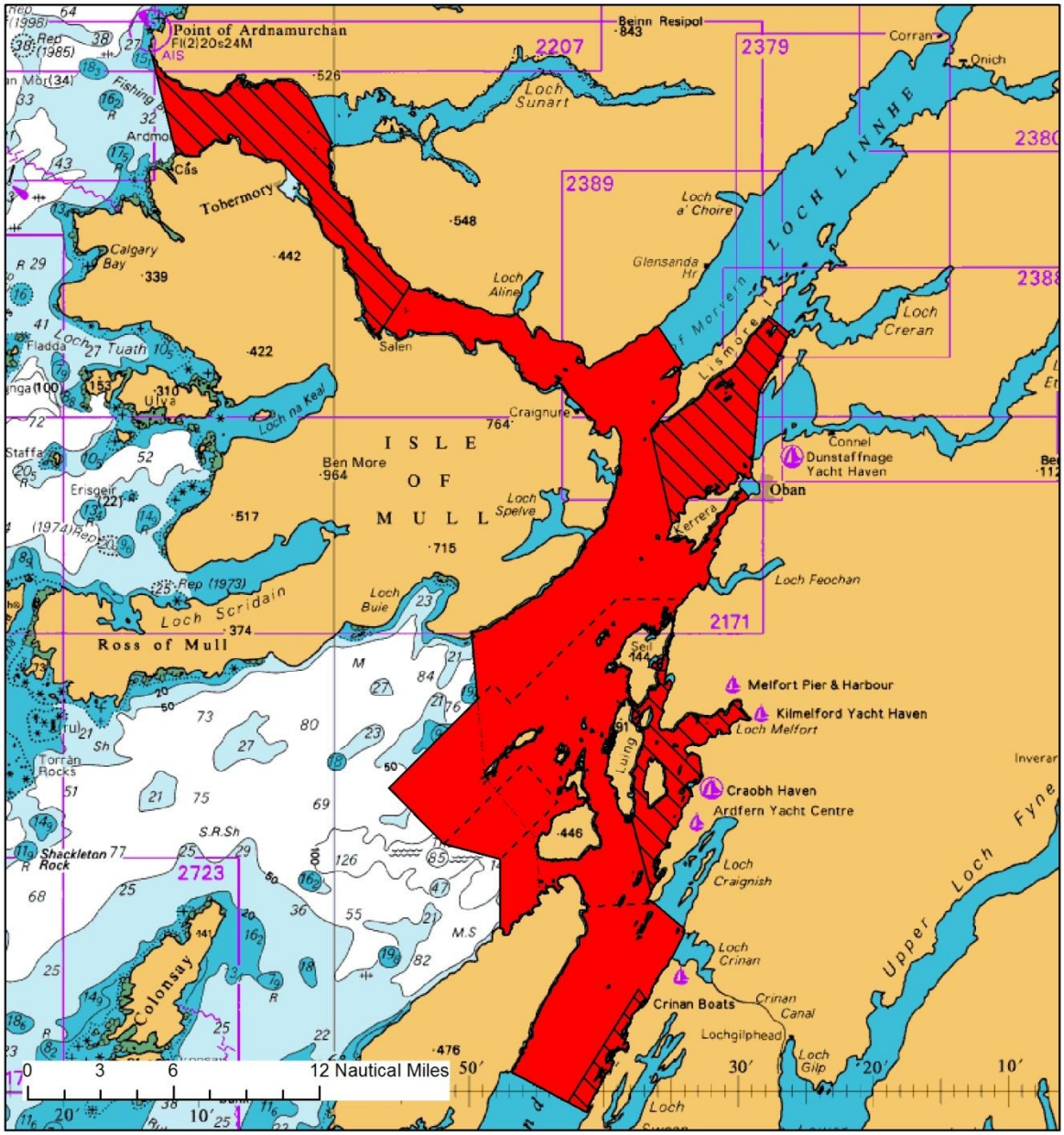
Other Habitats	Feature Records		Records Included	% Included
Mudflat / Sandflat communities	Count	9	9	100%
Sandbank communities	Count	6	6	100%
Circalittoral sandy mud communities	Count	45	45	100%
Circalittoral mixed sediment communities	Count	59	59	100%
Infralittoral mixed sediment communities	Count	19	19	100%
Infralittoral fine mud communities	Count	18	18	100%
Infralittoral sandy mud communities	Count	2	2	100%

Table A10.7 – Other Marine Habitat Added Value Assessment[14] - Protected from creels

Other Habitats	Feature Records		Records Included	% Included
Mudflat / Sandflat communities	Count	9	7	78%
Sandbank communities	Count	6	6	67%
Circalittoral sandy mud communities	Count	45	9	20%
Circalittoral mixed sediment communities	Count	59	4	7%
Infralittoral mixed sediment communities	Count	19	10	53%
Infralittoral fine mud communities	Count	18	12	67%
Infralittoral sandy mud communities	Count	2	0	0%

[14] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Figure A10.2 – Map of proposed measures – Loch Sunart to Sound of Jura MPA and Firth of Lorn SAC



Loch Sunart to Sound of Jura MPA
incorporating Firth of Lorn SAC but excluding Loch Sunart MPA / SAC

- Combined protected area boundary
- Firth of Lorn SAC
- Loch Sunart to Sound of Jura MPA
- management area
- Derogated areas

Within the red area no suction dredge, mechanical dredge, beam trawl, demersal trawl, bottom set nets, or long lining is permitted. By way of derogation mechanical dredge and demersal trawl (without tickler chains) is permitted in the 4 areas that have black hatching.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.4'N Scale 1:400,000

Table A10.8 – Site level assessment of measures[15]

Loch Sunart to Sound of Jura MPA (including Firth of Lorn SAC but not Loch Sunart MPA / SAC)	Area (KM^2)	As %
Site	770.18	
Protected from demersal trawls and mechanical dredge	549	71.3%
Protected from long lines, set nets, suction dredge and beam trawls	770.18	100%

Table A10.9 – Qualifying feature assessment[16] - Protected from suction dredge, beam trawls, long lines, and set nets

MPA Protected Feature / SAC Qualifying Feature	Feature Records		Records Included	% Included
Common Skate[17]	Count	4	4	100%
Bedrock and stony reef[18]	Area (Km^2)	113	113	100%

Table A10.10 – Qualifying feature assessment - Protected from demersal trawls and mechanical dredge

MPA Protected Feature / SAC Qualifying Feature	Feature Records		Records Included	% Included
Common Skate[17]	Count	4	2	50%
Bedrock and stony reef[18]	Area (Km^2)	113	113	100%

[15] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[16] Using habitat data provided by Scottish Natural Heritage and Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)
[17] This figure does not include commercially sensitive catch and release data – see figure A10.3
[18] This figure only reflects reef habitat found within the Firth of Lorn SAC.

Table A10.11 – Priority Marine Feature Added Value Assessment[19] – Protected from suction dredge, beam trawls, long lines, and set nets

Other PMFs	Feature Records		Records Included	% Included
Black guillemot	Count	15	15	100%
Burrowed mud (Fireworks anemone)	Count	4	4	100%
Burrowed mud (Mud volcano worms)	Count	1	1	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	41	41	100%
Burrowed mud (Tall seapen)	Count	36	36	100%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	36	36	100%
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	3	3	100%
Burrowing sea anemone	Count	3	3	100%
European spiny lobster	Count	26	25	100%
Fan mussel	Count	2	2	100%
Flame shell beds	Count	1	1	100%
Inshore deep mud with burrowing heart urchins	Count	2	2	100%
Kelp and seaweed communities on sublittoral sediment	Count	35	35	100%
Kelp beds	Count	119	119	100%
Maerl beds	Count	1	1	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	3	3	100%
Northern feather star	Count	65	65	100%
Northern sea fan and sponge communities (habitat)	Count	53	53	100%
Northern sea fan and sponge communities (species)	Count	61	61	100%
Ocean quahog	Count	9	9	100%
Offshore deep sea muds	Count	1	1	100%
Pink sea fingers	Count	2	2	100%
Seagrass beds	Count	1	1	100%
Tide-swept algal communities	Count	2	2	100%
Tide-swept algal communities and Kelp beds	Count	10	10	100%
White cluster anemone	Count	30	30	100%

[19] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A10.12 – Priority Marine Feature Added Value Assessment[20] - Protected from demersal trawls and mechanical dredge

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud (Fireworks anemone)	Count	4	3	75%
Burrowed mud (Mud volcano worms)	Count	1	0	0%
Burrowed mud (Seapens and burrowing megafauna)	Count	41	17	41.5%
Burrowed mud (Tall seapen)	Count	36	11	30.6%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	36	11	30.6%
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	3	1	33.3%
Burrowing sea anemone	Count	3	2	66.7%
European spiny lobster	Count	26	25	96.2%
Fan mussel	Count	2	0	0%
Flame shell beds	Count	1	1	100%
Inshore deep mud with burrowing heart urchins	Count	2	0	0%
Kelp and seaweed communities on sublittoral sediment	Count	35	30	85.7%
Kelp beds	Count	119	100	84%
Maerl beds	Count	1	1	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	3	2	66.7%
Northern feather star	Count	65	54	83.1%
Northern sea fan and sponge communities (habitat)	Count	53	51	96.2%
Northern sea fan and sponge communities (species)	Count	61	55	90.2%
Ocean quahog	Count	9	3	33.3%
Offshore deep sea muds	Count	1	1	100%
Pink sea fingers	Count	2	2	100%
Seagrass beds	Count	1	0	0%
Tide-swept algal communities	Count	2	1	50%
Tide-swept algal communities and Kelp beds	Count	10	10	100%
White cluster anemone	Count	30	25	83.3%

[20] Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A10.13 – Other Marine Habitat Added Value Assessment[21] - Protected from suction dredge, beam trawls, long lines, and set nets

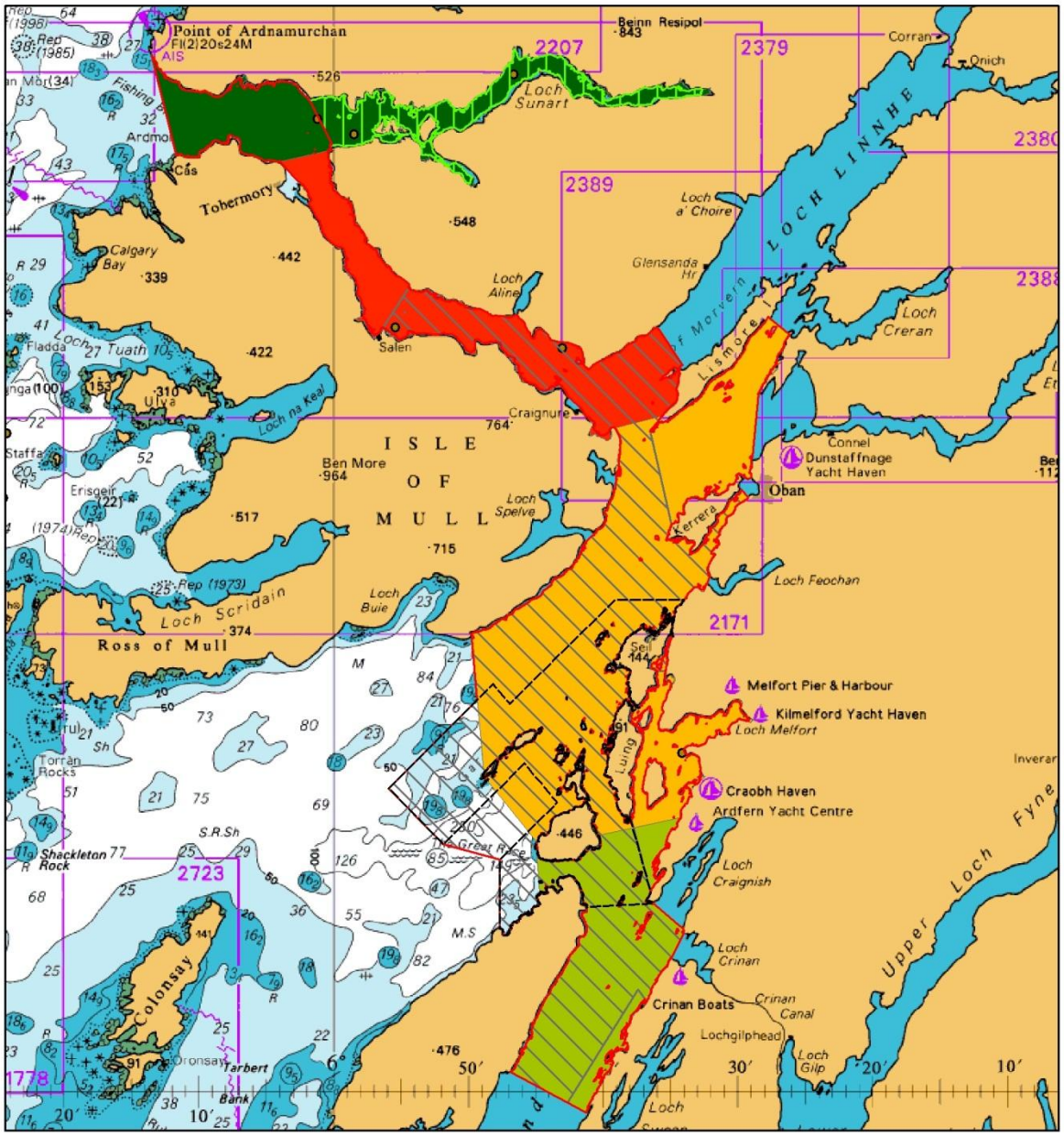
Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	590	590	100%
Sandbank communities	Count	61	61	100%
Infralittoral fine mud communities	Count	13	13	100%
Circalittoral mixed sediment communities	Count	256	256	100%
Circalittoral sandy mud communities	Count	94	94	100%
Infralittoral muddy sand communities	Count	1	1	100%
Infralittoral mixed sediment communities	Count	14	14	100%
Mudflat / Sandflat communities	Count	4	4	100%

Table A10.14 – Other Marine Habitat Added Value Assessment[21] - Protected from demersal trawls and mechanical dredge

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	590	474	80%
Sandbank communities	Count	61	54	89%
Infralittoral fine mud communities	Count	13	1	8%
Circalittoral mixed sediment communities	Count	256	170	66%
Circalittoral sandy mud communities	Count	94	43	46%
Infralittoral muddy sand communities	Count	1	1	100%
Infralittoral mixed sediment communities	Count	14	0	0%
Mudflat / Sandflat communities	Count	4	0	0%

[21] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Figure A10.3 – Cumulative map of common skate catch and release records



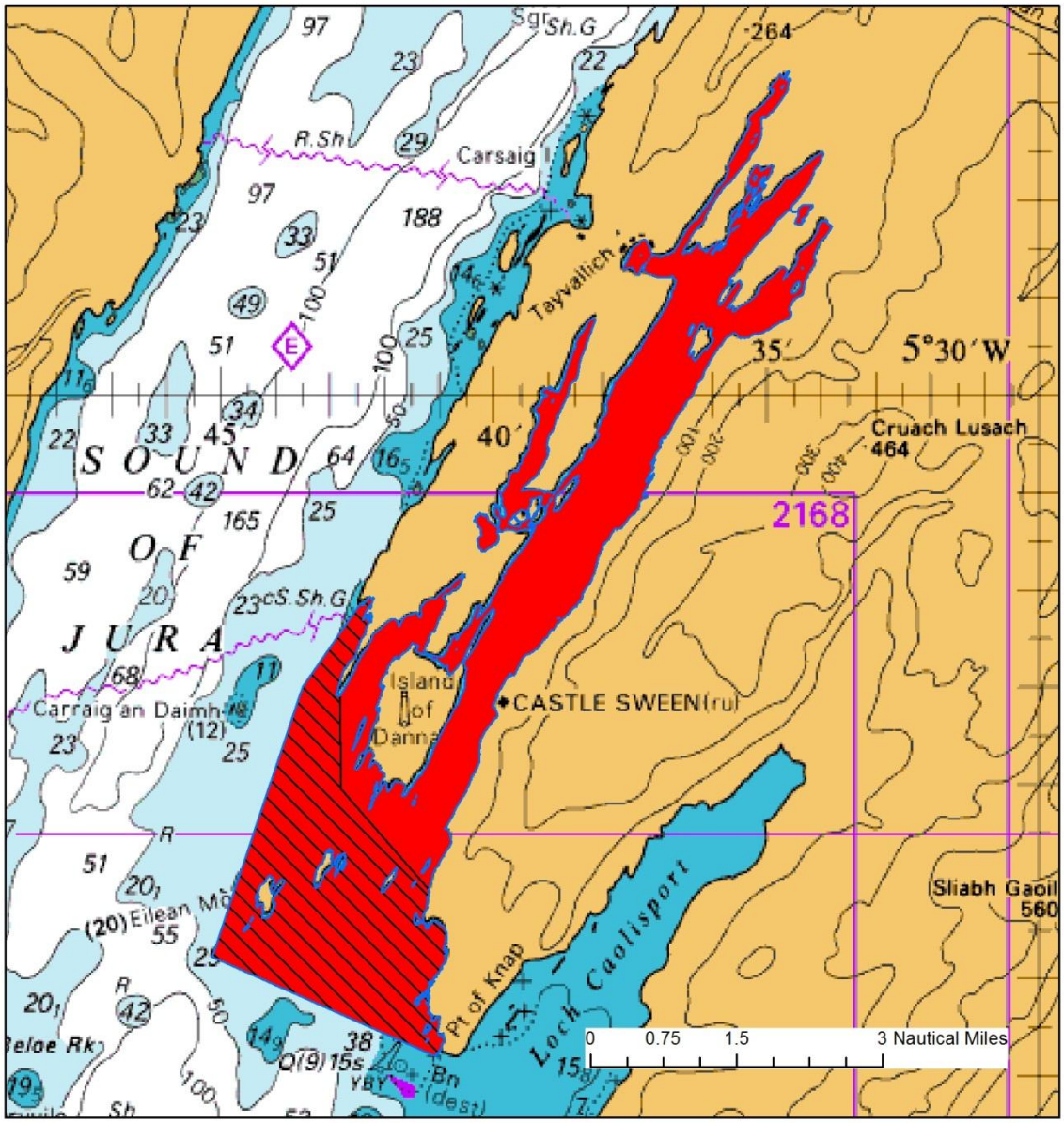
Loch Sunart to Sound of Jura MPA
incorporating Loch Sunart MPA / SAC and Firth of Lorn SAC

Firth of Lorn SAC	**Cumulative count of tag and release**	
Combined Sound of Mull / Firth of Lorn / Sound of Jura area		82
No mobile gear area		337
Loch Sunart No mobile gear area		534
Common skate		829

Using Geodatabase of Marine Features Adjacent to Scotland (GEMS i15 - March 2015).
Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.4'N Scale 1:400,000
Common skate records shown as cumulative counts in defined areas to keep specific capture locations in confidence

Appendix 11: Loch Sween MPA Management Measures

Figure A11.1 – Map of proposed measures



Loch Sween MPA

- MPA boundary
- derogated area
- management area

Within the red area there will be no suction dredge, mechanical dredge, beam trawl, demersal trawl, or hand gathering.
By way of derogation mechanical dredge, demersal trawl, and hand gathering will be permitted in the black hatched areas by vessels of less than 75 gross tonnes. Mechanical dredge further restricted to deploying gear only between the hours of 0700 - 2100 Monday to Friday

Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.0'N Scale 1:100,000

Table A11.1 – Site level assessment of measures[22]

Loch Sween MPA	Area (KM^2)	As %
Site	40.65	
Protected from hand gathering, demersal trawls, and mechanical dredge	24.13	59.3%
Protected from suction dredge, and beam trawls	40.65	100%
Protected by capacity and temporal restrictions on mechanical dredge vessels and capacity restriction on demersal trawl vessels	16.52	40.7%

Table A11.2 – Protected feature assessment[23] - Protected from suction dredge, and beam trawls

MPA Feature	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	7.46	7.46	100%
Burrowed mud (Fireworks anemone)	Count	1	1	100%
Burrowed mud (Mud volcano worms)	Count	103	103	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	57	57	100%
Burrowed mud (Tall seapen)	Count	1	1	100%
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	21	21	100%
Maerl beds	Area (km^2)	0.06	0.06	100%
	Count	122	122	100%
Native oysters (habitat)	Count	9	9	100%
Native oysters (species)	Count	56	56	100%
Sublittoral mud and mixed sediment communities	Area (km^2)	15.71	15.71	100%
	Count	148	148	100%

[22] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[23] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A11.3 – Protected feature assessment[24] - Protected from hand gathering, demersal trawls, and mechanical dredge

MPA Feature	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	7.46	7.46	100%
Burrowed mud (Fireworks anemone)	Count	1	1	100%
Burrowed mud (Mud volcano worms)	Count	103	103	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	57	57	100%
Burrowed mud (Tall seapen)	Count	1	1	100%
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	21	21	100%
Maerl beds	Area (km^2)	0.06	0.06	100%
	Count	122	122	100%
Native oysters (habitat)	Count	9	9	100%
Native oysters (species)	Count	56	56	100%
Sublittoral mud and mixed sediment communities	Area (km^2)	15.71	5.52	35.2%
	Count	148	126	85.1%

[24] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A11.4 – Priority Marine Feature Added Value Assessment[25] - Protected from suction dredge, and beam trawls

Other PMFs	Feature Records		Records Included	% Included
Blue mussel beds	Count	4	4	100%
Blue mussel beds & Low or variable salinity habitats	Count	1	1	100%
Flame shell beds	Count	2	2	100%
Inshore deep mud with burrowing heart urchins	Count	1	1	100%
Intertidal mudflats	Count	3	3	100%
Kelp and seaweed communities on sublittoral sediment	Count	41	41	100%
Kelp beds	Count	18	18	100%
Low or variable salinity habitats	Count	28	28	100%
Northern sea fan and sponge communities	Count	1	1	100%
Ocean quahog	Count	10	10	100%
Sea loch egg wrack beds	Count	3	3	100%
Seagrass beds	Count	44	44	100%
Serpulid aggregations	Count	5	5	100%
Tide-swept algal communities	Count	48	48	100%

[25] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A11.5 – Priority Marine Feature Added Value Assessment[26] - Protected from hand gathering, demersal trawls, and mechanical dredge

Other PMFs	Feature Records		Records Included	% Included
Blue mussel beds	Count	4	4	100%
Blue mussel beds & Low or variable salinity habitats	Count	1	1	100%
Flame shell beds	Count	2	0	0%
Inshore deep mud with burrowing heart urchins	Count	1	1	100%
Intertidal mudflats	Count	3	3	100%
Kelp and seaweed communities on sublittoral sediment	Count	41	40	97.6%
Kelp beds	Count	18	14	77.8%
Low or variable salinity habitats	Count	28	28	100%
Northern sea fan and sponge communities	Count	1	1	100%
Ocean quahog	Count	10	7	70%
Sea loch egg wrack beds	Count	3	3	100%
Seagrass beds	Count	44	44	100%
Serpulid aggregations	Count	5	5	100%
Tide-swept algal communities	Count	48	48	100%

[26] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A11.6 – Other Marine Habitat Added Value Assessment[26] - Protected from suction dredge, demersal trawls, mechanical dredge and beam trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	410	410	100%
Sandbank communities	Count	23	23	100%
Mudflat / Sandflat communities	Count	30	30	100%
Saltmarsh	Count	1	1	100%
Littoral mixed sediment communities	Count	1	1	100%
Infralittoral mixed sediment communities	Count	7	7	100%
Circalittoral sandy mud communities	Count	27	27	100%

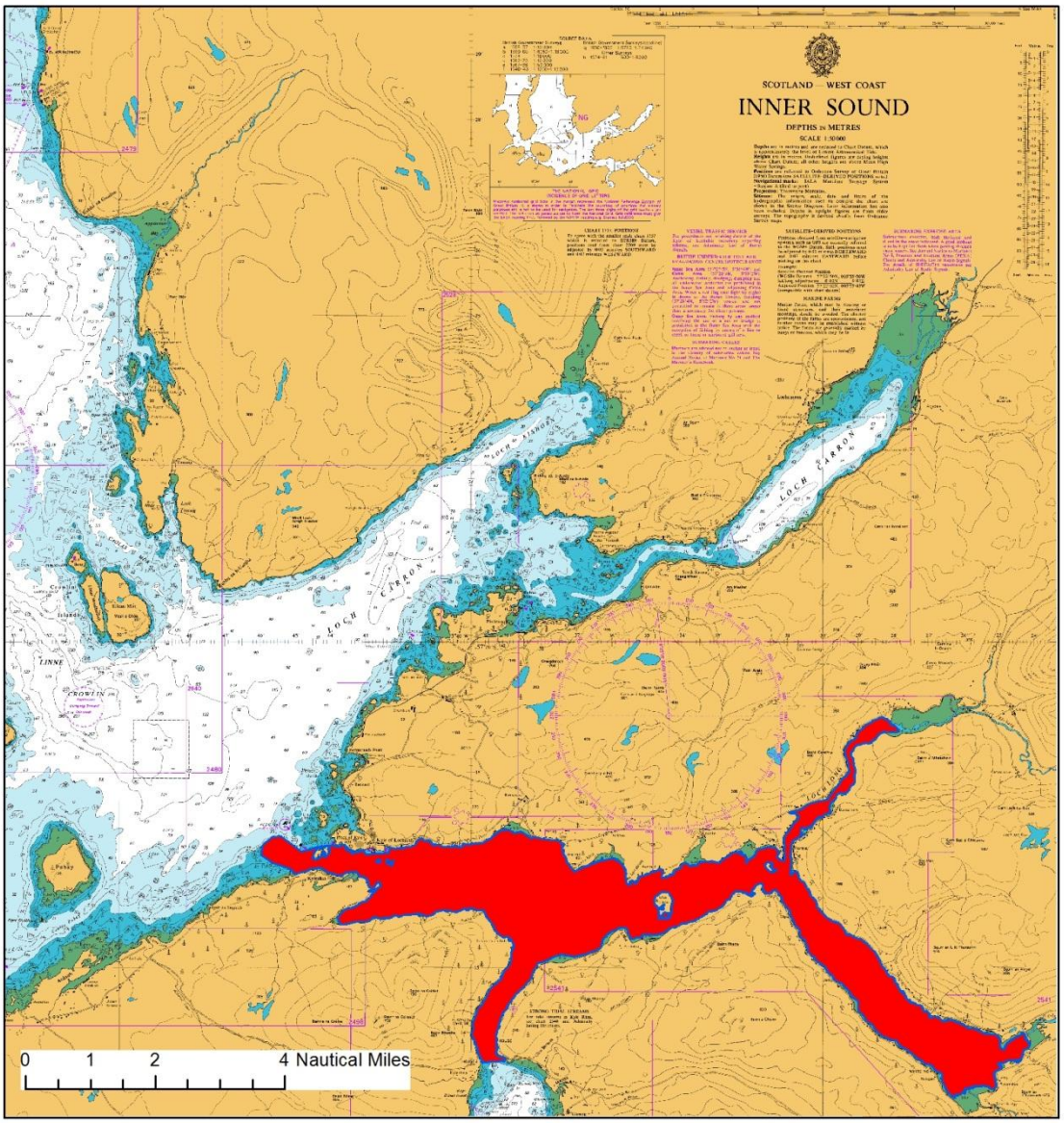
Table A11.7 – Other Marine Habitat Added Value Assessment[27] - Protected from hand gathering,

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	410	385	94%
Sandbank communities	Count	23	18	78%
Mudflat / Sandflat communities	Count	30	30	100%
Saltmarsh	Count	1	1	100%
Littoral mixed sediment communities	Count	1	1	100%
Infralittoral mixed sediment communities	Count	7	7	100%
Circalittoral sandy mud communities	Count	27	24	89%

[27] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 12: Lochs Duich, Long & Alsh MPA/SAC Management Measures

Figure A12.1 – Map of proposed measures



Lochs Duich Long & Alsh MPA/SAC

Combined MPA / SAC boundary

management area

Within the red area no suction dredging, mechanical dredging, beam trawling, or demersal trawling is permitted.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 57.25'N Scale 1:150,000

Table A12.1 – Site level assessment of measures[28]

Lochs Duich Long & Alsh MPA / SAC	Area (KM^2)	As %
Site	40.93	
Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls	40.93	100%

Table A12.2 – Qualifying / protected feature assessment[29] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

MPA Protected Feature / SAC Qualifying Feature	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	11.92	11.92	100%
Burrowed mud (Fireworks anemone)	Count	33	33	100%
Burrowed mud (Mud volcano worms)	Count	3	3	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	11	11	100%
Burrowed mud (Tall seapen)	Count	59	59	100%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	53	53	100%
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	2	2	100%
Flame shell beds	Area (km^2)	0.94	0.94	100%
	Count	70	70	100%
Horse mussel reefs	Count	34	34	100%
Stony Reefs	Area (km^2)	15.37	15.37	100%

[28] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum

[29] Using habitat data provided by Scottish Natural Heritage and Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A12.3 – Priority Marine Feature Added Value Assessment[30] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

Other PMFs	Feature Records		Records Included	% Included
Blue mussel beds	Count	3	3	100%
Blue mussel beds & Low or variable salinity habitats	Count	1	1	100%
Inshore deep mud with burrowing heart urchins	Count	3	3	100%
Kelp and seaweed communities on sublittoral sediment	Count	6	6	100%
Kelp beds	Count	17	17	100%
Low or variable salinity habitats	Count	13	13	100%
Maerl beds	Count	4	4	100%
Northern feather star	Count	6	6	100%
Northern sea fan and sponge communities	Count	1	1	100%
Ocean quahog	Count	4	4	100%
Sea loch egg wrack beds	Count	6	6	100%
Tide-swept algal communities	Count	25	25	100%
Tide-swept algal communities and Kelp beds	Count	2	2	100%

Table A12.4 – Other Marine Habitat Added Value Assessment[30] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

Other Habitats	Feature Records		Records Included	% Included
Mudflat / Sandflat communities	Count	9	9	100%
Sandbank communities	Count	7	7	100%
Saltmarsh	Count	27	27	100%
Infralittoral mixed sediment communities	Count	5	5	100%
Circalittoral sandy mud communities	Count	13	13	100%
Infralittoral fine mud communities	Count	5	5	100%
Circalittoral mixed sediment communities	Count	61	61	100%

[30] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 13: Luce Bay SAC Management Measures

A one day stakeholder workshop will be held on Friday 26 June 2015 to reconcile the remaining issues in relation to management of Luce Bay SAC.

The venue will be;

Easterbrook Hall Hotel, Bankhead Road, Dumfries, DG1 4TA

If you would like to attend this workshop please send an email to marine_conservation@scotland.gsi.gov.uk

Anyone is welcome to request a place at this workshop. If the event is oversubscribed then places will be assigned in the following order;

1. Local stakeholders who submitted a response on Luce Bay and completed a Respondent Information Form

2. Other stakeholders who submitted a response on Luce Bay and completed a Respondent Information Form

3. Other local stakeholders

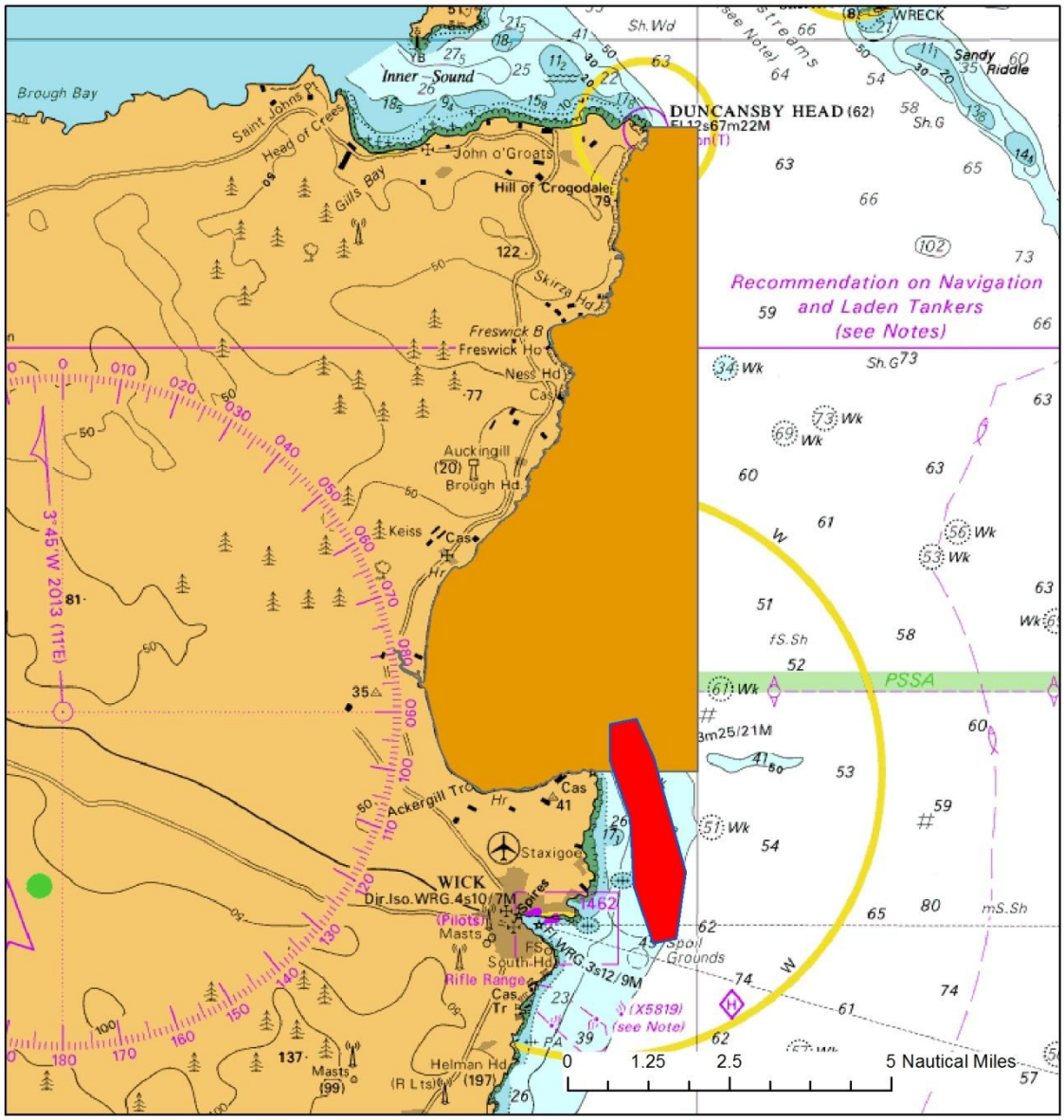
4. Other stakeholders

Requests for a place should be submitted by 16 June 2015.

Further details will be communicated to attendees on 19 June 2015.

Appendix 14: Noss Head MPA Management Measures

Figure A14.1 – Map of proposed measures



Noss Head MPA

- MPA boundary
- management area
- existing Sinclair Bay closed area

Within the combined red and brown areas no suction dredging, mechanical dredging, beam trawling, or demersal trawling is permitted

Projection: Mercator Datum: WGS 1984 Standard Parallel: 59'N Scale 1:150,000

Table A14.1 – Site level assessment of measures[31,32]

Noss Head MPA	Area (KM^2)	As %
Site	7.54	
Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls	7.54	100%

Table A14.2 – Protected feature assessment[33] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

MPA Protected Feature	Feature Records		Records Included	% Included
Horse mussel beds	Area (km^2)	4.11	4.11	100%
	Count	110	110	100%

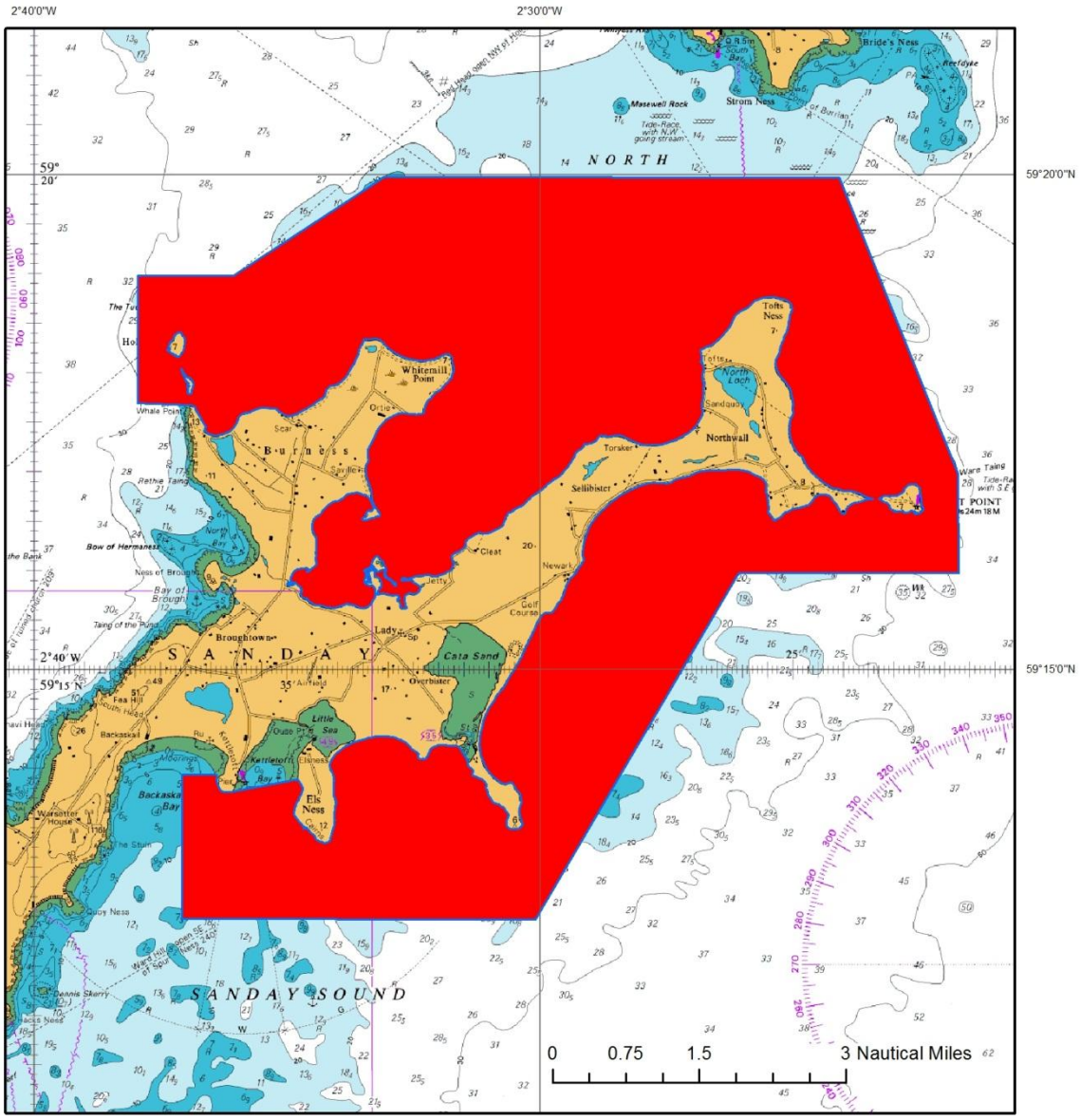
Table A14.3 – Other Marine Habitat Added Value Assessment[33] – Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	5	5	100%
Sandbank communities	Count	5	5	100%
Circalittoral mixed sediment communities	Count	10	10	100%

[31] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[32] None of these tables contain values relating to the existing Sinclair Bay fisheries management area
[33] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 15: Sanday SAC Management Measures

Figure A15.1 – Map of proposed measures



SANDAY SAC

SAC boundary

Management area

Management proposal

Within the red area no suction dredging, mechanical dredging, beam trawling, demersal trawling, or set netting is permitted

Projection: Mercator Datum: WGS 1984 Standard Parallel: 59'N Scale 1:100,000

Table A15.1 – Site level assessment of measures[34]

Sanday SAC	Area (KM^2)	As %
Site	109.8	
Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets	109.8	100%

Table A15.2 – Qualifying feature assessment[35] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

SAC Qualifying Feature	Feature Records		Records Included	% Included
Intertidal mudflats	Count	1	1	100%
Intertidal mudflats and sands	Area (km^2):	6.87	6.87	100%
Low or variable salinity habitats	Count	7	7	100%
Seagrass beds	Count	5	5	100%
Stony Reefs	Area (km^2):	179.38	179.38	100%
Subtidal sandbanks	Area (km^2):	20.23	20.23	100%

Table A15.3 – Priority Marine Feature Added Value Assessment[36] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls and set nets

Other PMFs	Feature Records		Records Included	% Included
Black guillemot	Count	3	3	100%
Horse mussel beds	Count	3	3	100%
Kelp and seaweed communities on sublittoral sediment	Count	11	11	100%
Kelp beds	Count	110	110	100%
Tide-swept algal communities	Count	2	2	100%
Tide-swept algal communities and Kelp beds	Count	21	21	100%

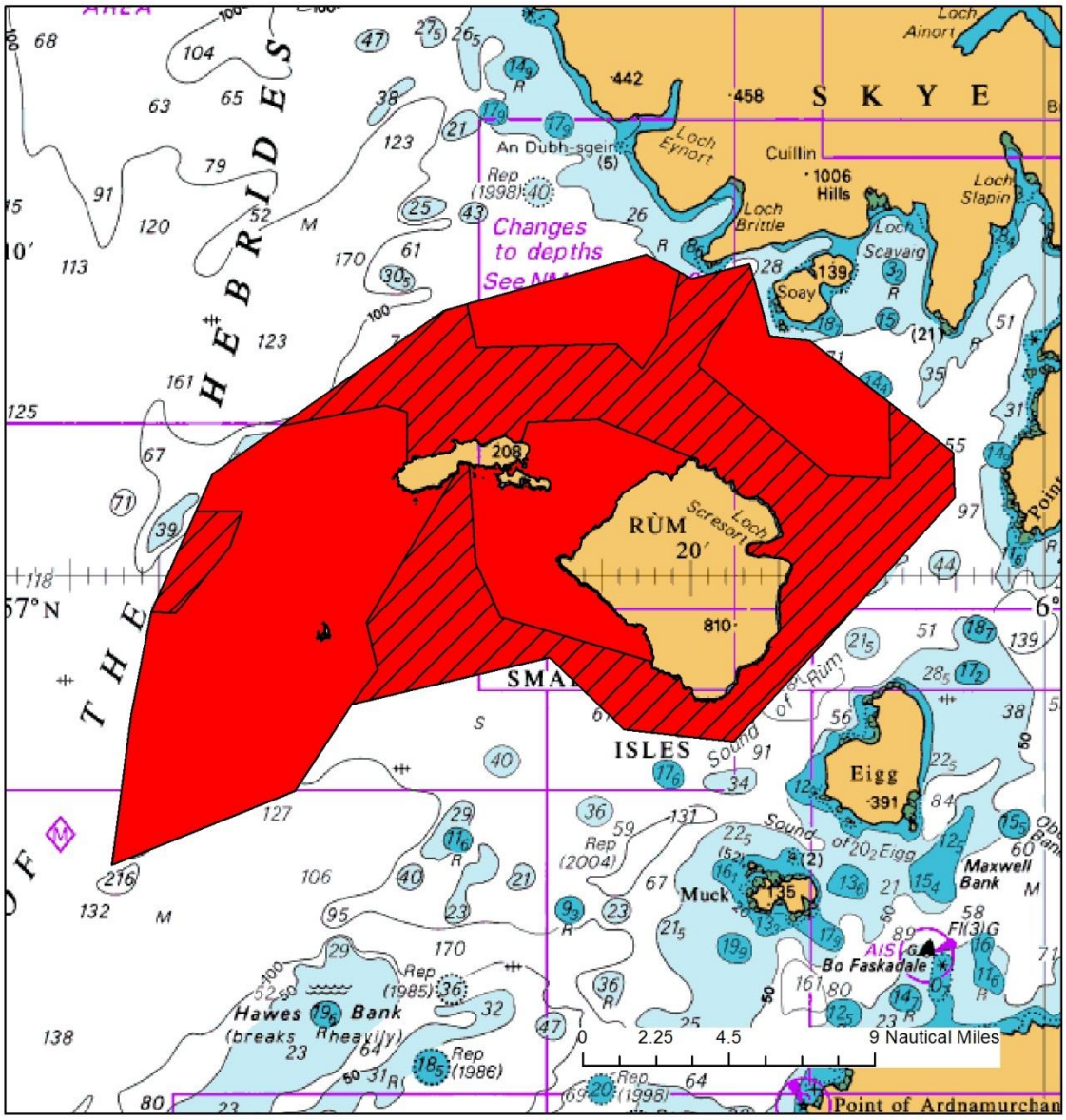
[34] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[35] Using habitat data provided by Scottish Natural Heritage and Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)
[36] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A15.4 – Other Marine Habitat Added Value Assessment[36] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

Other Habitats	Feature Records		Records Included	% Included
Saltmarsh	Count	1	1	100%
Infralittoral mixed sediment communities	Count	4	4	100%
Circalittoral mixed sediment communities	Count	3	3	100%
Infralittoral fine mud communities	Count	1	1	100%

Appendix 16: Small Isles MPA Management Measures

Figure A16.1 – Map of proposed measures



Small Isles MPA

derogated areas

MPA boundary

management area

Within the red area no suction dredging, mechanical dredging, beam trawling, demersal trawling, or set netting is permitted

By way of derogation mechanical dedging and demersal trawling is permitted by vessels of less than 150 gross tonnes within the black hatched areas.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 57'N Scale 1:300,000

Table A16.1 – Site level assessment of measures[37]

Small Isles MPA	Area (KM^2)	As %
Site	803.25	
Protected from demersal trawls	456.74	56.9%
Protected from set nets, suction dredge, and beam trawls	803.25	100%
Protected by capacity restriction on demersal trawl and mechanical dredge vessels	346.51	43.1%

Table A16.2 – Protected feature assessment[38] - Protected from suction dredge, beam trawls, and set nets

MPA Protected Feature	Feature Records		Records Included	% Included
Black guillemot	Area (km^2)	159.01	159.01	100%
	Count	79	79	100%
Burrowed mud	Area (km^2)	260.73	260.73	100%
Burrowed mud (Fireworks anemone)	Count	4	3	100%
Burrowed mud (Mud volcano worms)	Count	30	30	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	14	14	100%
Burrowed mud (Tall seapen)	Count	37	37	100%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	29	29	100%
Circalittoral sand and mud communities	Area (km^2)	17.75	17.75	100%
	Count	16	16	100%
Fan mussel aggregations	Area (km^2)	3.92	3.92	100%
	Count	119	119	100%
Horse mussel beds	Area (km^2)	0.98	0.98	100%
	Count	8	8	100%
Northern feather star	Count	42	42	100%
Northern sea fan and sponge communities (species)	Count	31	31	100%
Northern sea fan and sponge communities (habitats)	Area (km^2)	86.46	86.46	100%
	Count	29	29	100%
White cluster anemone	Count	27	27	100%

[37] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum

[38] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A16.3 – Protected feature assessment[39] - Protected from demersal trawls and mechanical dredge

MPA Protected Feature	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	260.73	81.14	31.12%
Burrowed mud (Fireworks anemone)	Count	4	3	75.00%
Burrowed mud (Mud volcano worms)	Count	30	30	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	14	7	50.00%
Burrowed mud (Tall seapen)	Count	37	23	62.16%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	29	20	68.97%
Circalittoral sand and mud communities	Area (km^2)	17.75	7.84	44.18%
	Count	16	16	100%
Fan mussel aggregations	Area (km^2)	3.92	3.92	100%
	Count	119	119	100%
Horse mussel beds	Area (km^2)	0.98	0.98	100%
	Count	8	8	100%
Northern feather star	Count	42	34	80.95%
Northern sea fan and sponge communities (species)	Count	31	30	96.77%
Northern sea fan and sponge communities (habitats)	Area (km^2)	86.46	86.44	99.98%
	Count	29	28	96.55%
White cluster anemone	Count	27	27	100%

[39] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A16.4 – Priority Marine Feature Added Value Assessment[40] – Protected from suction dredge, beam trawls, and set nets

Other PMFs	Feature Records		Records Included	% Included
Burrowing sea anemone	Count	2	2	100%
European spiny lobster	Count	2	2	100%
Flame shell beds	Count	2	2	100%
Kelp and seaweed communities on sublittoral sediment	Count	16	16	100%
Kelp beds	Count	44	44	100%
Maerl beds	Count	9	9	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	1	1	100%
Ocean quahog	Count	5	5	100%
Offshore subtidal sands and gravels	Count	14	14	100%
Seagrass beds	Count	7	7	100%

Table A16.5 – Priority Marine Feature Added Value Assessment[40] - Protected from demersal trawls and mechanical dredge

Other PMFs	Feature Records		Records Included	% Included
Burrowing sea anemone	Count	2	2	100%
European spiny lobster	Count	2	2	100%
Flame shell beds	Count	2	2	100%
Kelp and seaweed communities on sublittoral sediment	Count	16	15	93.75%
Kelp beds	Count	44	42	95.45%
Maerl beds	Count	9	9	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	1	1	100%
Ocean quahog	Count	5	5	100%
Offshore subtidal sands and gravels	Count	14	11	78.57%
Seagrass beds	Count	7	7	100%

[40] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A16.6 – Other Marine Habitat Added Value Assessment[41] – Protected from suction dredge, beam trawls, and set nets

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	188	188	100%
Mudflat / Sandflat communities	Count	3	3	100%
Sandbank communities	Count	59	59	100%
Circalittoral sandy mud communities	Count	18	18	100%
Infralittoral sandy mud communities	Count	1	1	100%
Circalittoral mixed sediment communities	Count	57	57	100%

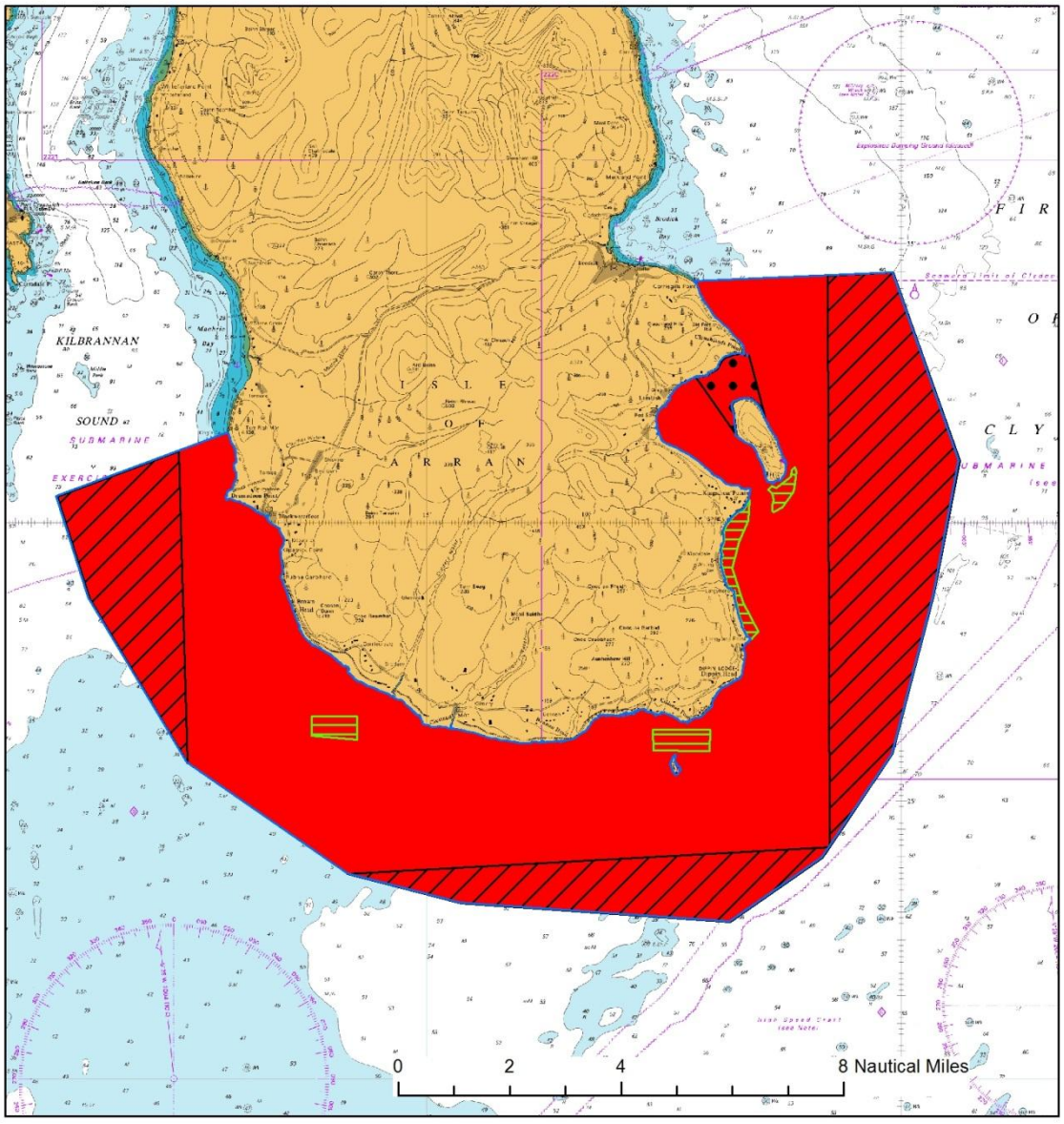
Table A16.7 – Other Marine Habitat Added Value Assessment[41] - Protected from demersal trawls, and mechanical dredge

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	188	158	84%
Mudflat / Sandflat communities	Count	3	3	100%
Sandbank communities	Count	59	54	92%
Circalittoral sandy mud communities	Count	18	17	94%
Infralittoral sandy mud communities	Count	1	1	100%
Circalittoral mixed sediment communities	Count	57	50	88%

[41] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 17: South Arran MPA Management Measures

Figure A17.1 – Map of proposed measures



South Arran MPA

- MPA boundary
- Lamlash Bay No Take Zone
- no static gear
- derogated area
- management area

Within the red area no suction dredge, mechanical dredge, beam trawl, or demersal trawl (including seine net) is permitted.
By way of derogation demersal trawl will be permitted in the black hatched areas by vessels smaller than 120 gross tonnes.
No static gear (creels, bottom set nets, or long lines) permitted in the green hatched areas.
No fishing of any kind in the Lamlash Bay No Take Zone

Projection: Mercator Datum: WGS 1984 Standard Parallel: 55.5'N Scale 1:175,000

Table A17.1 – Site level assessment of measures[42]

South Arran MPA	Area (KM^2)	As %
Site	279.87	
Protected from creels, set nets and long lines	7.35	2.6%
Protected from demersal trawls	177.72	63.5%
Protected from suction dredge, mechanical dredge, and beam trawls	279.87	100%
Protected by capacity restriction on demersal trawl vessels	102.15	36.5%

Table A17.2 – Protected feature assessment[43] - Protected from suction dredge, mechanical dredge, and beam trawls

MPA Protected Features	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	159.53	159.63	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	53	53	100%
Kelp and seaweed communities on sublittoral sediment	Area (km^2)	2.25	2.25	100%
	Count	36	36	100%
Maerl beds	Area (km^2)	1.40	1.40	100%
	Count	39	39	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Area (km^2)	14.59	14.59	100%
	Count	10	10	100%
Ocean quahog	Count	21	21	100%
Seagrass beds	Area (km^2)	0.81	0.81	100%
	Count	14	14	100%
Tide-swept coarse sands with burrowing bivalves	Area (km^2)	0.30	0.30	100%
	Count	28	28	100%

[42] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[43] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A17.3 – Protected feature assessment[44] - Protected from demersal trawls

MPA Protected Features	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	159.53	61.68	38.6%
Burrowed mud (Seapens and burrowing megafauna)	Count	53	17	32.1%
Kelp and seaweed communities on sublittoral sediment	Area (km^2)	2.25	2.25	100%
	Count	36	36	100%
Maerl beds	Area (km^2)	2.43	2.43	100%
	Count	39	39	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Area (km^2)	14.59	14.59	100%
	Count	10	10	100%
Ocean quahog	Count	21	18	85.7%
Seagrass beds	Area (km^2)	0.81	0.81	100%
	Count	14	14	100%
Tide-swept coarse sands with burrowing bivalves	Area (km^2)	0.30	0.30	100%
	Count	28	28	100%

Table A17.4 – Protected feature assessment[45] - Protected from creels, set nets and long lines

MPA Protected Features	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	159.53	0	0%
Burrowed mud (Seapens and burrowing megafauna)	Count	53	0	0%
Kelp and seaweed communities on sublittoral sediment	Area (km^2)	2.25	0.5	22.3%
	Count	36	6	16.7%
Maerl beds	Area (km^2)	2.43	1.1	45.3%
	Count	39	12	30.8%
Maerl or coarse shell gravel with burrowing sea cucumbers	Area (km^2)	14.59	1.02	7%
	Count	10	2	20%
Ocean quahog	Count	21	0	0%
Seagrass beds	Area (km^2)	0.81	0.6	74%
	Count	14	12	85.7%
Tide-swept coarse sands with burrowing bivalves	Area (km^2)	0.30	0	0%
	Count	28	3	10.7%

[44] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A17.5 – Priority Marine Feature Added Value Assessment[46] - Protected from suction dredge, mechanical dredge, and beam trawls

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	4	4	100%
Fan mussel	Count	1	1	100%
Kelp beds	Count	8	8	100%
Native oysters	Count	1	1	100%

Table A17.6 – Priority Marine Feature Added Value Assessment[45] - Protected from demersal trawls

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	4	1	100%
Fan mussel	Count	1	1	100%
Kelp beds	Count	8	8	100%
Native oysters	Count	1	1	100%

Table A17.7 – Other Marine Habitat Added Value Assessment[46] - Protected from suction dredge, mechanical dredge, and beam trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	31	31	100%
Sandbank communities	Count	54	54	100%
Infralittoral mixed sediment communities	Count	16	16	100%
Circalittoral sandy mud communities	Count	39	39	100%
Infralittoral fine mud communities	Count	1	1	100%
Infralittoral sandy mud communities	Count	1	1	100%
Circalittoral mixed sediment communities	Count	66	66	100%
Infralittoral mixed sediment communities	Count	16	16	100%

[45] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

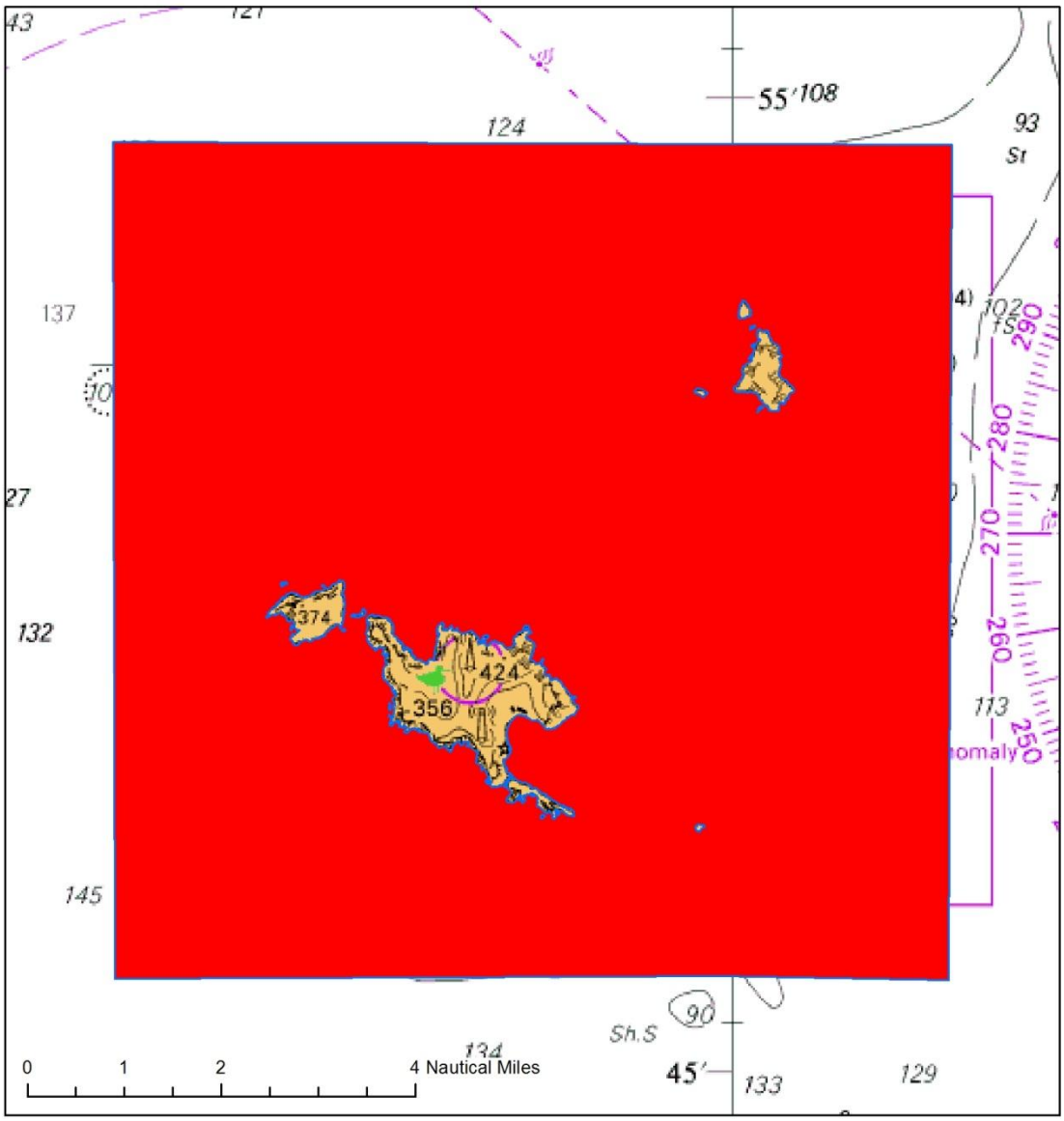
Table A17.8 – Other Marine Habitat Added Value Assessment[46] - Protected from demersal trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	31	31	100%
Sandbank communities	Count	54	54	100%
Infralittoral mixed sediment communities	Count	16	16	100%
Circalittoral sandy mud communities	Count	39	37	95%
Infralittoral fine mud communities	Count	1	1	100%
Infralittoral sandy mud communities	Count	1	1	100%
Circalittoral mixed sediment communities	Count	66	66	100%
Infralittoral mixed sediment communities	Count	16	16	100%

[46] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 18: St Kilda SAC Management Measures

Figure A18.1 – Map of proposed measures



St Kilda SAC

SAC boundary

management area

Within the red area no suction dredging, mechanical dredging, beam trawling, demersal trawling, or set netting is permitted

Projection: Mercator Datum: WGS 1984 Standard Parallel: 57.8'N Scale 1:100,000

Table A18.1 – Site level assessment of measures[47]

St Kilda SAC	Area (KM^2)	As %
Site	245.35	
Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets	245.35	100%

Table A18.2 – Qualifying feature assessment[48] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

SAC Qualifying Feature	Feature Records		Records Included	% Included
Stony Reef	Area (km^2)	168.46	168.46	100%

Table A18.3– Priority Marine Feature Added Value Assessment[49] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

Other PMFs	Feature Records		Records Included	% Included
Burrowing sea anemone	Count	1	1	100%
European spiny lobster	Count	5	5	100%
Kelp and seaweed communities on sublittoral sediment	Count	1	1	100%
Kelp beds	Count	38	38	100%
Northern feather star	Count	5	5	100%
Northern sea fan and sponge communities	Count	1	1	100%
Ocean quahog	Count	1	1	100%
Pink sea fingers	Count	1	1	100%
White cluster anemone	Count	5	5	100%

[47] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[48] Qualifying feature assessment uses habitat data provided by Scottish Natural Heritage
[49] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

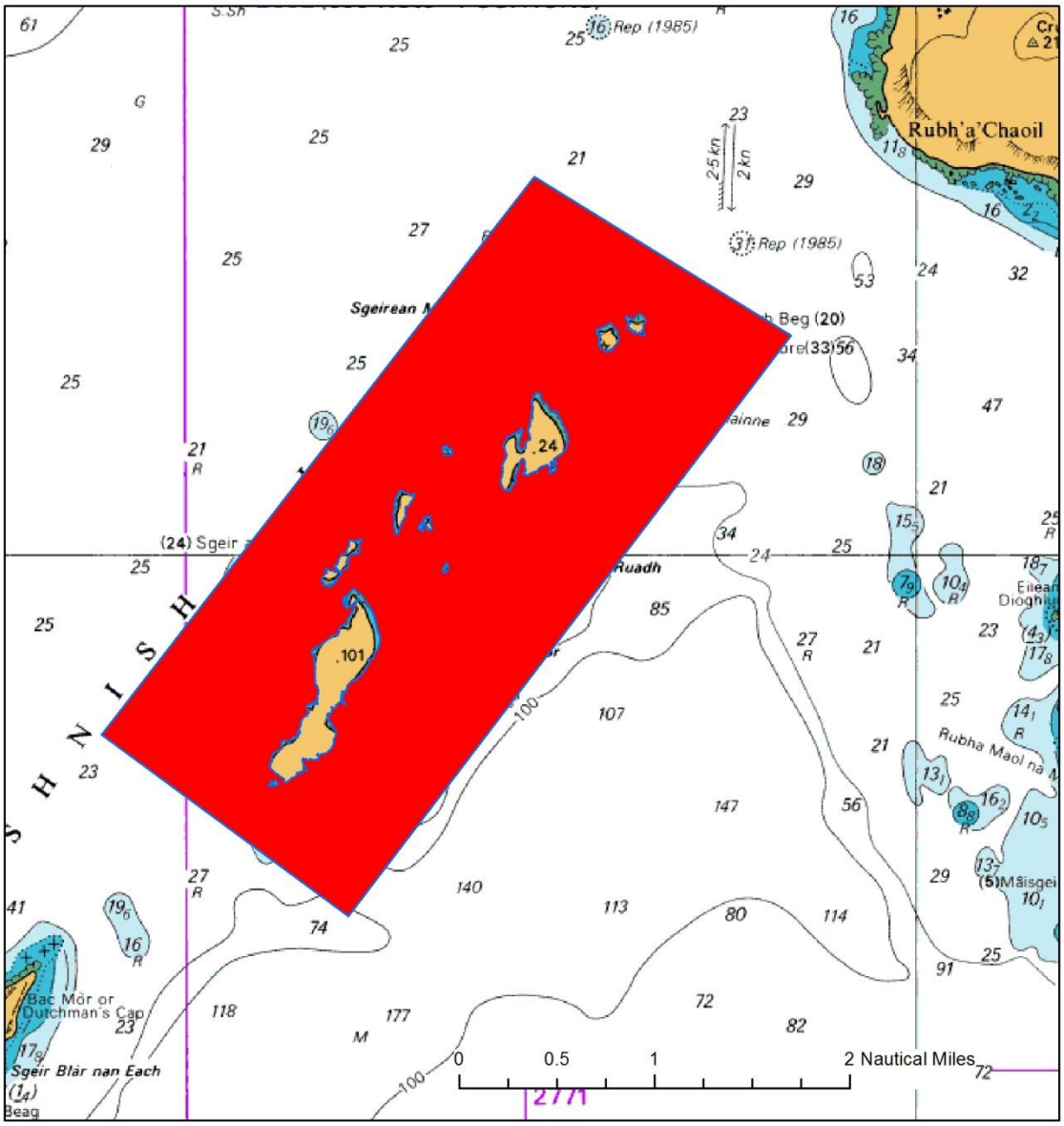
Table A18.4 – Other Marine Habitat Added Value Assessment[50] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

Other Habitats	Feature Records		Records Included	% Included
Sandbank communities	Count	16	16	100%
Circalittoral mixed sediment communities	Count	4	4	100%

[50] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 19: Treshnish Isles SAC Management Measures

Figure A19.1 – Map of proposed measures



Treshnish Isles SAC

- SAC boundary
- Management area
- SAC boundary

Within the red area there will be no suction dredging, mechanical dredging, beam trawling, demersal trawling, or set netting.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.5'N Scale 1:50,000

Table A19.1 – Site level assessment of measures[51]

Treshnish Isles SAC	Area (KM^2)	As %
Site	18.55	
Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets	18.55	100%

Table A19.2 – Qualifying feature assessment[52] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

SAC Qualifying Feature	Feature Records		Records Included	% Included
Stony Reef	Area (km^2)	10.5	10.5	100%

Table A19.3 – Priority Marine Feature Added Value Assessment[53] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

Other PMFs	Feature Records		Records Included	% Included
Black guillemot	Count	6	6	100%
Kelp beds	Count	70	70	100%
Maerl beds	Area (km^2)	0.76	0.76	100%
	Count	12	12	100%
Seagrass beds	Area (km^2)	0.04	0.04	100%
	Count	2	2	100%
Tide-swept algal communities and Kelp beds	Count	3	3	100%

[51] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[52] Using habitat data provided by Scottish Natural Heritage
[53] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

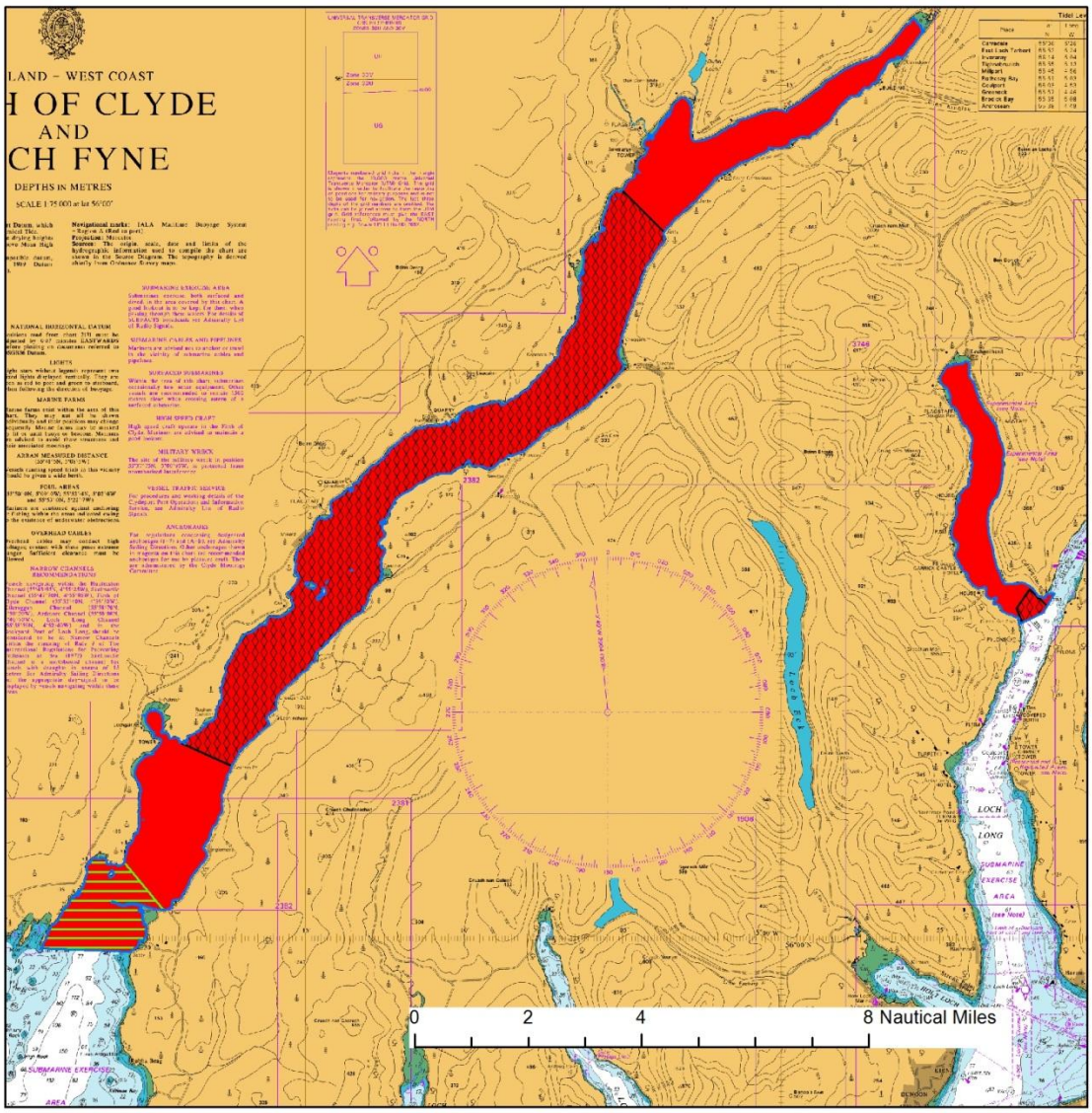
Table A19.4 – Other Marine Habitat Added Value Assessment[54] - Protected from demersal trawls, mechanical dredge, suction dredge, beam trawls, and set nets

Other Habitats	Feature Records		Records Included	% Included
Sandbank communities	Count	38	38	100%
Circalittoral mixed sediment communities	Count	34	34	100%

[54] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 20: Upper Loch Fyne & Loch Goil MPA Management Measures

Figure A20.1 – Map of proposed measures



Upper Loch Fyne & Loch Goil MPA

- MPA boundary
- No static gear area
- derogated areas
- Management area

Within the red area no suction dredge, mechanical dredge,beam trawl or demersal trawl is permitted.
By way of derogation demersal trawl is permitted in the black hatched areas by vessels of less than 75 gross tonnes.
With the green hatched area no static gear (creels, bottom set nets, or long lining) is permitted.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 56.0'N Scale 1:175,000

Table A20.1 – Site level assessment of measures[55]

Upper Loch Fyne and Loch Goil MPA	Area (KM^2)	As %
Site	87.65	
Protected from creels, long lines, and set nets	7.11	8.1%
Protected from demersal trawls	43.1	49.2%
Protected from suction dredge, mechanical dredge, and beam trawls	87.65	100%
Protected by capacity restriction on demersal trawl	44.55	50.8%

Table A20.2 – Protected feature assessment[56] - Protected from suction dredge, mechanical dredge, and beam trawls

MPA Feature	Feature Records		Records Included	% Included
Sublittoral mud communities[57]	Area (km^2)	77.77	77.77	100%
Burrowed mud (Fireworks anemone)	Count	117	117	100%
Burrowed mud (Mud volcano worms)	Count	50	50	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	201	201	100%
Flame shell beds	Area (km^2)	0.50	0.50	100%
	Count	17	17	100%
Horse mussel beds	Count	23	23	100%
Ocean quahog	Count	7	7	100%
Sublittoral mud and specific mixed sediment communities	Count	153	153	100%

[55] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[56] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)
[57] This new habitat descriptor represents a merging of the polygons for burrowed mud and sublittoral mud and specific mixed sediment communities.

Table A20.3 – Protected feature assessment[58] - Protected from demersal trawls

MPA Feature	Feature Records		Records Included	% Included
Sublittoral mud communities[59]	Area (km^2)	77.77	41.5	53.4%
Burrowed mud (Fireworks anemone)	Count	117	103	88%
Burrowed mud (Mud volcano worms)	Count	50	21	42%
Burrowed mud (Seapens and burrowing megafauna)	Count	201	111	55.2%
Flame shell beds	Area (km^2)	0.50	0.50	100%
	Count	17	17	100%
Horse mussel beds	Count	23	22	95.6%
Ocean quahog	Count	7	6	85.7%
Sublittoral mud and specific mixed sediment communities	Count	153	127	83%

Table A20.4 – Protected feature assessment[59] - Protected from creels, long lines, and set nets

MPA Feature	Feature Records		Records Included	% Included
Sublittoral mud communities[60]	Area (km^2)	77.77	4.19	5.4%
Burrowed mud (Fireworks anemone)	Count	117	0	0%
Burrowed mud (Mud volcano worms)	Count	50	0	0%
Burrowed mud (Seapens and burrowing megafauna)	Count	201	0	0%
Flame shell beds	Area (km^2)	0.50	0.50	100%
	Count	17	17	100%
Horse mussel beds	Count	23	5	21.7%
Ocean quahog	Count	7	0	0%
Sublittoral mud and specific mixed sediment communities	Count	153	1	0.7%

[58] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)
[59] This new habitat descriptor represents a merging of the polygons for burrowed mud and sublittoral mud and specific mixed sediment communities.

Table A20.5 – Priority Marine Feature Added Value Assessment[60] – Protected from suction dredge, mechanical dredge, and beam trawls

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	75	75	100%
Fan mussel	Count	1	1	100%
Kelp and seaweed communities on sublittoral sediment	Count	83	83	100%
Low or variable salinity habitats	Count	8	8	100%
Maerl beds	Count	9	9	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	1	1	100%

Table A20.6 – Priority Marine Feature Added Value Assessment[63] – Protected from demersal trawls

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	75	71	94.7%
Fan mussel	Count	1	1	100%
Kelp and seaweed communities on sublittoral sediment	Count	83	60	72.3%
Low or variable salinity habitats	Count	8	8	100%
Maerl beds	Count	9	9	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	1	0	0%

[60] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A20.7 – Priority Marine Feature Added Value Assessment[61] - Protected from creels, long lines, and set nets

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	75	0	0%
Fan mussel	Count	1	1	100%
Kelp and seaweed communities on sublittoral sediment	Count	83	43	51.8%
Low or variable salinity habitats	Count	8	0	100%
Maerl beds	Count	9	9	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	1	0	0%

Table A20.8 – Other Marine Habitat Added Value Assessment[63] - Protected from suction dredge, mechanical dredge, and beam trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	170	170	100%
Mudflat / Sandflat communities	Count	4	4	100%
Sandbank communities	Count	98	98	100%
Infralittoral fine mud communities	Count	9	9	100%
Infralittoral sandy mud communities	Count	1	1	100%
Circalittoral mixed sediment communities	Count	323	323	100%

[61] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A20.9 – Other Marine Habitat Added Value Assessment[62] – Protected from demersal trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	170	94	55%
Mudflat / Sandflat communities	Count	4	4	100%
Sandbank communities	Count	98	53	54%
Infralittoral fine mud communities	Count	9	9	100%
Infralittoral sandy mud communities	Count	1	1	100%
Circalittoral mixed sediment communities	Count	323	220	68%

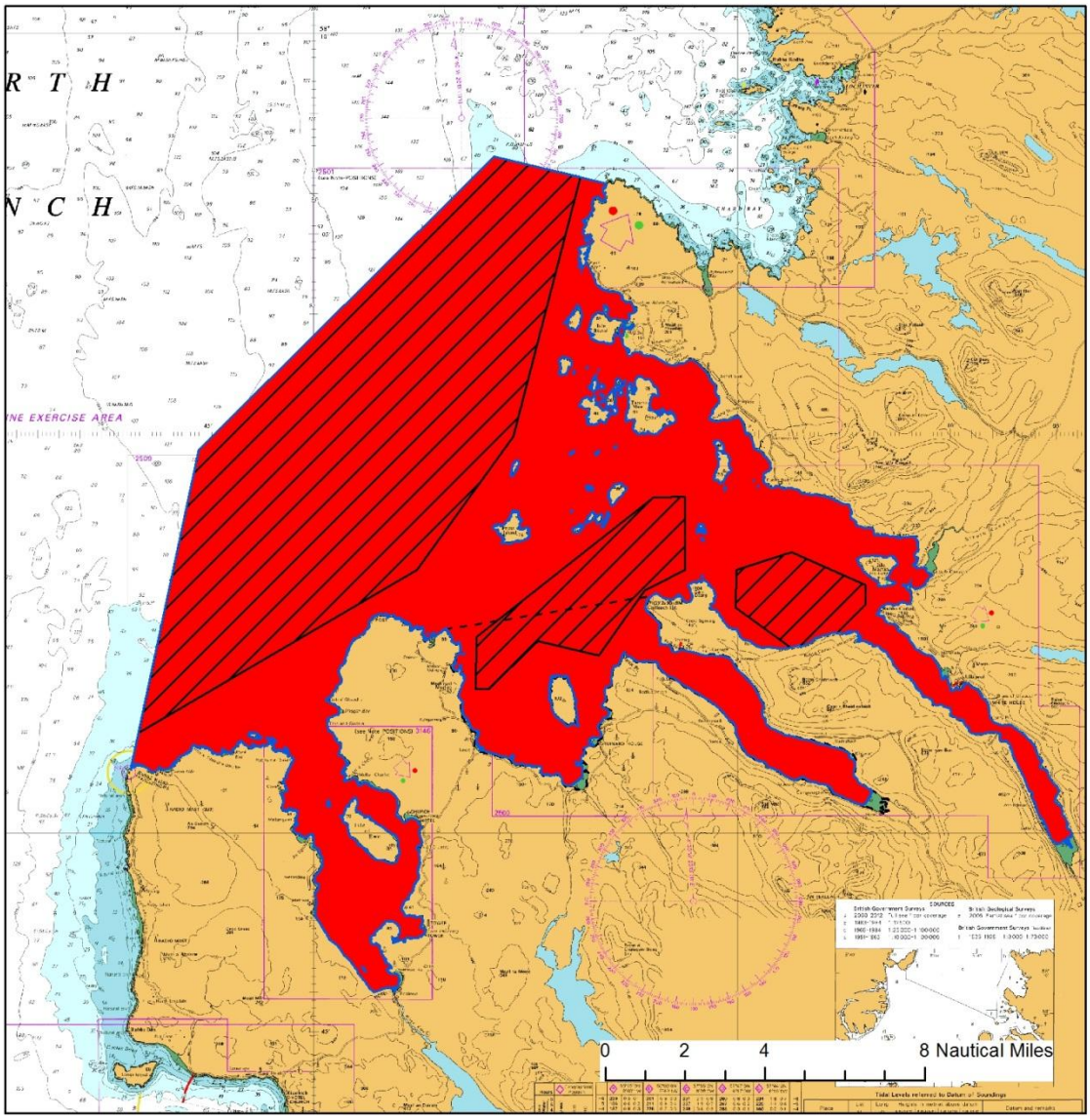
Table A20.10 – Other Marine Habitat Added Value Assessment[64] - Protected from creels, long lines, and set nets

Feature	Feature records		Records included	% included
Rocky reef communities	Count	170	24	14%
Mudflat / Sandflat communities	Count	4	1	25%
Sandbank communities	Count	98	31	32%
Infralittoral fine mud communities	Count	9	0	0%
Infralittoral sandy mud communities	Count	1	0	0%
Circalittoral mixed sediment communities	Count	323	116	36%

[62] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Appendix 21: Wester Ross MPA Management Measures

Figure A21.1 – Map of proposed measures



Wester Ross MPA

MPA boundary

Little Loch Broom and Gruinard Bay seasonal mobile gear closure

derogated areas

management area

Within the red area no suction dredging, mechanical dredging, beam trawling, or demersal trawling is permitted.

By way of derogation demersal trawling by vessels of less than150 gross tonnes is permitted in the black hatched areas.

Projection: Mercator Datum: WGS 1984 Standard Parallel: 58'N Scale 1:250,000

Table A21.1 – Site level assessment of measures[63]

Wester Ross MPA	Area (KM^2)	As %
Site	599.19	
Protected from demersal trawls	306.25	51.1%
Protected from suction dredge, mechanical dredge, and beam trawls	599.19	100%
Protected by capacity restriction on demersal trawl vessels	292.94	48.9%

Table A21.2 – Protected feature assessment[64] - Protected from mechanical dredge, suction dredge and beam trawls

MPA Protected Feature	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	179.81	179.81	100%
Burrowed mud (Seapens and burrowing megafauna)	Count	69	69	100%
Burrowed mud (Tall seapen)	Count	53	53	100%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	39	39	100%
Circalittoral muddy sand communities	Area (km^2)	101.27	101.27	100%
	Count	14	14	100%
Flame shell beds	Area (km^2)	0.07	0.07	100%
	Count	9	9	100%
Kelp and seaweed communities on sublittoral sediment	Area (km^2)	18.92	18.92	100%
	Count	69	69	100%
Maerl beds	Area (km^2)	6.10	6.10	100%
	Count	73	73	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	7	7	100%
Northern feather star (habitat)	Area (km^2)	0.02	0.02	100%
Northern feather star (species)	Count	21	20	100%

[63] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[64] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A21.3 – Protected feature assessment[65] - Protected from demersal trawls

MPA Protected Feature	Feature Records		Records Included	% Included
Burrowed mud	Area (km^2)	179.81	50.02	27.8%
Burrowed mud (Seapens and burrowing megafauna)	Count	69	60	87%
Burrowed mud (Tall seapen)	Count	53	39	73.6%
Burrowed mud (Tall seapens and burrowing megafauna)	Count	39	30	76.9%
Circalittoral muddy sand communities	Area (km^2)	101.27	30.86	30.5%
	Count	14	13	92.9%
Flame shell beds	Area (km^2)	0.07	0.07	100%
	Count	9	9	100%
Kelp and seaweed communities on sublittoral sediment	Area (km^2)	18.92	18.92	100%
	Count	69	69	100%
Maerl beds	Area (km^2)	6.10	6.10	100%
	Count	73	73	100%
Maerl or coarse shell gravel with burrowing sea cucumbers	Count	7	7	100%
Northern feather star (habitat)	Area (km^2)	0.02	0.02	100%
Northern feather star (species)	Count	21	20	95.2%

[65] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A21.4 – Priority Marine Feature Added Value Assessment[66] - Protected from mechanical dredge, suction dredge and beam trawls

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	5	5	100%
European spiny lobster	Count	2	2	100%
Fan mussel	Count	1	1	100%
Heart cockle	Count	1	1	100%
Horse mussel beds	Count	4	4	100%
Inshore deep mud with burrowing heart urchins	Count	1	1	100%
Kelp beds	Count	84	84	100%
Low or variable salinity habitats	Count	1	1	100%
Native oysters	Count	2	2	100%
Northern sea fan and sponge communities	Count	1	1	100%
Ocean quahog	Count	29	29	100%
Seagrass beds	Count	10	10	100%
Tide-swept algal communities and Kelp beds	Count	1	1	100%

[66] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A21.5 – Priority Marine Feature Added Value Assessment[67] - Protected from demersal trawls

Other PMFs	Feature Records		Records Included	% Included
Burrowed mud or Inshore deep mud with burrowing heart urchins	Count	5	3	60%
European spiny lobster	Count	2	2	100%
Fan mussel	Count	1	0	0%
Heart cockle	Count	1	1	100%
Horse mussel beds	Count	4	4	100%
Inshore deep mud with burrowing heart urchins	Count	1	1	100%
Kelp beds	Count	84	81	96.4%
Low or variable salinity habitats	Count	1	1	100%
Native oysters	Count	2	2	100%
Northern sea fan and sponge communities	Count	1	1	100%
Ocean quahog	Count	29	29	100%
Seagrass beds	Count	10	10	100%
Tide-swept algal communities and Kelp beds	Count	1	1	100%

[67] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

Table A21.6 – Other Marine Habitat Added Value Assessment[67] - Protected from mechanical dredge, suction dredge and beam trawls

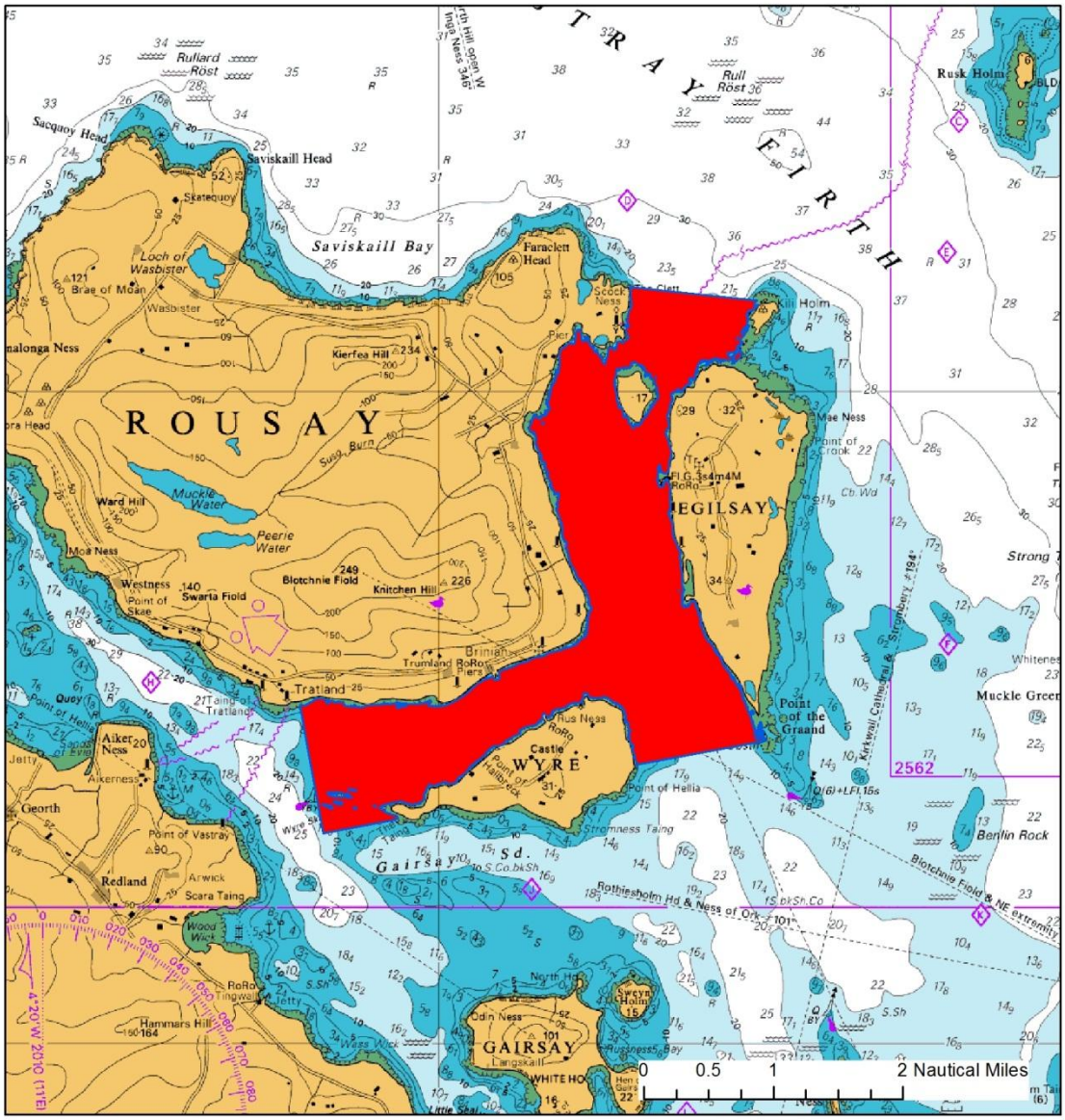
Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	210	210	100%
Mudflat / Sandflat communities	Count	23	23	100%
Sandbank communities	Count	90	90	100%
Infralittoral mixed sediment communities	Count	24	24	100%
Circalittoral sandy mud communities	Count	43	43	100%
Infralittoral fine mud communities	Count	4	4	100%
Circalittoral mixed sediment communities	Count	87	87	100%

Table A21.7 – Other Marine Habitat Added Value Assessment[67] - Protected from demersal trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	210	206	98%
Mudflat / Sandflat communities	Count	23	23	100%
Sandbank communities	Count	90	88	98%
Infralittoral mixed sediment communities	Count	24	24	100%
Circalittoral sandy mud communities	Count	43	43	100%
Infralittoral fine mud communities	Count	4	4	100%
Circalittoral mixed sediment communities	Count	87	87	100%

Appendix 22: Wyre & Rousay Sounds MPA Management Measures

Figure A22.1 – Map of proposed measures



Within the red area no suction dredging, mechanical dredging, beam trawling, or demersal trawling is permitted

Projection: Mercator Datum: WGS 1984 Standard Parallel: 59'N Scale 1:75,000

Table A22.1 – Site level assessment of measures[68]

Wyre and Rousay Sounds MPA	Area (KM^2)	As %
Site	16.2	
Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls	16.2	100%

Table A22.2 – Protected feature assessment[69] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

MPA Protected Feature	Feature Records		Records Included	% Included
Kelp and seaweed communities on sublittoral sediment	Area (km^2)	1.97	1.97	100%
	Count	22	22	100%
Maerl beds	Area (km^2)	6.30	6.30	100%
	Count	46	46	100%

Table A22.3 – Priority Marine Feature Added Value Assessment[69] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

Other PMFs	Feature Records		Records Included	% Included
Kelp beds	Count	3	3	100%
Tide-swept algal communities	Count	1	1	100%

Table A22.4 – Other Marine Habitat Added Value Assessment[69] - Protected from demersal trawls, mechanical dredge, suction dredge and beam trawls

Other Habitats	Feature Records		Records Included	% Included
Rocky reef communities	Count	15	15	100%
Sandbank communities	Count	20	20	100%

[68] All calculations have been done using the Lambert Azimuthal Equal Area projection and ETRS1989 datum
[69] Using Geodatabase for Marine Habitats and Species in Scotland (GeMS i15)

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