

Planning Scotland's Seas Possible Nature Conservation Marine Protected Areas

Analysis of Consultation Responses

**PLANNING SCOTLAND'S SEAS:
POSSIBLE NATURE CONSERVATION
MARINE PROTECTED AREAS**

ANALYSIS OF CONSULTATION RESPONSES

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The views expressed in this report are those of the researcher and do not necessarily represent those of the Scottish Government or Scottish Ministers.

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EXECUTIVE SUMMARY

Background overview

Planning Scotland's Seas: Possible Nature Conservation Marine Protected Areas' was published for consultation in July 2013 setting out proposals for a number of new Marine Protected Areas (MPAs).

The consultation ran from 25th July 2013 until 13th November 2013; respondents were invited to submit their opinions and views about the development of the MPA network and on the specific planned MPAs.

Overview of respondents

The consultation attracted 14,703 responses. This included 332 standard consultation responses (216 from individuals and 116 from organisations) and 14,371 submissions from the 11 campaign texts promoted by various organisations, briefly:

- Three relating to protection for seabirds attracting 1,626 responses.
- Three relating to protection for whales and dolphins attracting 6,627 responses.
- Three in support of the MPA network attracting 4,803 responses.
- Two supporting the South Arran possible MPA attracting 1,315 responses.

Overview of analysis

The consultation posed a series of questions on the network as a whole, the Sustainability Appraisal and the individual possible Marine Protected Areas (pMPAs).

The standard 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.

Overview of responses

The following paragraphs highlight the main themes that emerged in responses to the consultation.

MPA Network

There was support for an MPA network from almost all respondents, both campaign and standard. Many respondents stressed the need for protection for the marine environment.

Many respondents wanted to see the network offer protection for more species. Seabirds, whales and dolphins were mentioned most often in this regard.

There were comments on the need for designations to be based on scientific advice and up to date data and that the network and individual MPAs would need to be supported by robust and effective management.

Small numbers of respondents expressed some concerns. These related primarily to:

- the need to ensure that any management options are consulted and agreed before designation;
- the need to ensure that management options do not cause any adverse socioeconomic effects on local communities;
- that management options should take account of the need for energy provision;
- that more of the objectives should be set to recover rather than conserve;
- that there should be more species added to the protected features;
- the need for more MPAs or for MPAs to cover a wider area; conversely there was a smaller concern from others that the pMPAs will cover too large an area;
- and the need for fish production to be allowed to continue and develop in appropriate areas.

Proposed MPAs

The individual pMPA sections of the consultation attracted varying responses in terms of numbers and depth.

The designation and management options for all of the pMPAs were supported by most of those who commented.

Clyde Sea Sill: There were requests to include the kelp forest and other seabird species. Several respondents pointed out that data used for species count is up to 15 years out of date and wanted to see this addressed. A few respondents, across various organisational groups, felt that designation would be beneficial to the area.

East Caithness Cliffs: There were requests to include the kelp forest and other seabird species. Several respondents pointed out that data used for species count is up to 15 years out of date and wanted to see this addressed. There was welcome for the alignment of this pMPA with the existing SPA in the same area.

East of Gannet and Montrose Fields: A small number of respondents commented on the importance of the ocean quahog and offshore deep sea mud and gravel communities.

Faroe-Shetland Sponge Belt: While there was support for designation and for the management options, a number of respondents would support a smaller area. There were differences in opinion between sectors (particularly environment and fishing) over restrictions on fishing in the area.

Fetlar to Haroldswick: There were requests to include other seabird species. There were calls for the objective for horse mussel beds, maerl beds, and kelp and seaweed communities to be recover rather than conserve. A small number commented that they would like to see those involved in fishing the area are consulted over the plans for reducing or limiting pressures from any fishing activity.

Hatton-Rockall Basin: A very small number commented and supported the designation and management options.

Loch Creran: There were few comments on this site. A small number of respondents would prefer the objective of recover rather than conserve for the flame shell beds.

Loch Sunart: Some respondents would prefer the objective for the features, and especially the serpulid aggregations, to be recover rather than conserve. There were differences in opinion between sectors over restrictions on fishing in the area. Some commented on the need to involve local communities and all other stakeholders in the management of the MPA.

Loch Sunart to the Sound of Jura: There were several suggestions for changes including extending the area, reducing the area and adding various seabird species to the protected features. There were some differences in opinion between sectors over restrictions on fishing in the area. There were comments suggesting insufficient data, especially in relation to the common skate.

Loch Sween: Several respondents felt the objectives for the maerl beds and native oyster should be recover rather than conserve. There were calls for a more realistic assessment of fishing levels in the area and clarity over the likely levels of fishing restrictions. A small number asked for recreational anchorages to be reviewed to ensure these are not in the vicinity of maerl beds.

Loch Duich, Long and Aish: Several of those who commented wanted to see the objective for burrowed mud set to recover rather than conserve. There were some calls to add fan mussels to the list of protected features, again set to recover.

Monach Isles: There were calls to include the kelp forests as a protected feature and a small number of comments that the designation would also benefit a range of other seabird species.

Mousa to Boddam: There were some suggestions that the boundary should change to include possible sandeel habitat beyond the proposed area. Some called for the objective for sandeels to be set as recover rather than conserve and for kelp forests to be protected. There were also calls for research into the impact of demersal dredge on sandeels.

North-east Faroe Shetland Channel: There were a number of comments on the importance of the area to the fishing industry with respondents asking for suitable monitoring and compliance of fishing activity as well as engagement with the industry. There was some concern that there are no management options to protect the continental slope.

North-west Orkney: Several of those who commented on this site called for the objective for sandeels to be set to recover rather than conserve. Most supported the proposal to limit any future sandeel fishery in the area.

North-west sea lochs and the Summer Isles: There were conflicting suggestions with some respondents wanting to see the area extended while others felt it should

be reduced. There were calls to add seagrass beds and sea trout to the protected features. Some suggested the area should be called Wester Ross to give a clear local identity, foster local interest and give a greater sense of local ownership.

Noss Head: There was broad support for the designation and the management options for this pMPA.

Papa Westray: There were requests to include the kelp forest and other seabird species. A small number commented on the importance of the site for seabird and wildlife tourism and for anglers and divers.

Rosemary Bank Seamount: A small number commented; most supported the designation and the management options for this pMPA.

Small Isles: There were requests to include various marine mammal, shellfish and seabird species. There were some suggestions to extend the boundary to the coastline of Skye and to include the sea lochs of southern Skye and the sea areas around the Isle of Soay. Most of those who commented supported the management options and there were suggestions that measures should be set jointly for the pMPA and the SPA that it overlaps.

South Arran: There were many requests to include protection for seabirds. Many respondents asked for the boundary to extend around Arran and for bottom trawling and dredging to be prohibited in the area. These suggestions were opposed by fishing interests. There were calls for the objectives for protected features in this and the other Clyde pMPAs to be set to recover rather than conserve. Fishing interests disputed the basis for designating the protected features.

The Barra Fan and Hebrides Terrace Seamount: This area was described by several respondents as important or significant due to the effect of the seamount on underwater currents. Some respondents wanted to see changes to the boundary, stressing the importance of the area for fishing interests.

Turbot Bank: Several of those who commented on this site wanted the objective for sandeels to be set as recover rather than conserve. Respondents, from the environment/conservation and static fishing groups, listed both economic and wellbeing benefits from designating this area.

Upper Loch Fyne and Loch Goil: There were several calls for additional protected features and for all protected features in this area as recover rather than conserve. There were many suggestions and some requests for clarification with regards the management options.

West Shetland Shelf: A very small number commented on this pMPA and the comments made by the largest number was support for the designation and management options.

Wyre and Rousay Sounds: A small number of respondents commented on the impact of or on existing and proposed finfish farms in the area. There were also several comments on the importance of the maerl beds.

Alternative choices

For certain features there are options and alternatives to represent them in the network and respondents were asked their opinion on three areas where alternatives were possible.

Offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds: There was a large support for the Firth of Forth Banks Complex. The main reason for this support was the importance of the area for sandeels. In addition, several respondents commented that the alternatives would not constitute an ecologically equivalent contribution to the network.

Burrowed mud feature in the Fladens: There was a large support for the Central Fladen only option. Respondents felt this would be the best way to protect the tall sea pen population.

Offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud: A very small number commented, most of whom supported the Geikie slide and Hebridean slope option.

Summary of key themes

The consultation attracted a large number of responses as well as a substantial number of campaign responses.

Overall, there was broad support for the possible Marine Protected Areas. At many of the pMPAs, however, respondents made suggestions for various changes to designation or management options.

There were a number of recurring themes including the following:

Many respondents felt that some species had been overlooked, mainly seabirds; whales; dolphins; and porpoises. There were comments that the proposed network would offer direct protection to only 39 of the 6,500 species and habitats in Scotland's seas. Some respondents considered this would mean that the network was not ecologically coherent and therefore not meet the duty under the Marine Act as well as failing to meet international commitments.

The feeling that the network should protect more species was the main reason given by those who said that the proposed network is not complete or ecologically coherent.

A number of respondents talked about the need to look at cumulative socioeconomic effects of the network as well as effects in each pMPA.

A few respondents expressed concerns over conflicts between Government targets for renewables and its goals for the marine environment. A small number asked for clarification and more certainty over the interaction of MPAs with existing and proposed installations and assets, for example pipelines and cables for oil and gas.

A small number voiced concern over economic impacts to international and national fishing fleets from the proposals and suggested alterations that would still meet environmental objectives. There were comments that any impact on mobile fishing

would have consequences for both individual concerns and on coastal communities as well as for food security.

While many respondents supported a ban on bottom dredging and trawling others commented that these methods have been in use for many years without evidence that it is damaging the environment.

A small number commented on the number of pMPAs and the size of the proposed areas and suggested smaller more localised areas would be more appropriate, targeting more specifically the habitats and species designated for protection.

Several respondents supported the designation of the Skye to Mull search.

There was a degree of concern over a perceived lack of regard to both legislative and policy frameworks which, some said, had led them to be unable to support many of the proposals. Respondents felt that these had not been adhered to in relation to network design, OSPAR obligations and replication in particular.

Several respondents commented on the need for more data and for all decisions to be science-led and based on up to date, verified data. Others requested that the quality and use of evidence to underpin the scientific recommendations be externally reviewed.

Robust management and involving all stakeholders, in particular local communities, in managing MPAs was seen as important.

1 INTRODUCTION

Background

- 1.1 In 2013, the Scottish Government consulted on a range of marine issues under the Planning Scotland's Seas consultations. Individual consultations looked at:
 - A draft National Marine Plan;
 - Draft plan options for Offshore Renewable Energy;
 - Priority Marine Features;
 - Integration between Marine and Terrestrial Planning; and
 - Marine Protected Areas network.
- 1.2 This report presents the findings from the responses to the consultation 'Possible Nature Conservation Marine Protected Areas'.
- 1.3 The Scottish Government's vision for our marine environment is for 'clean, healthy, safe, productive, biologically diverse marine and coastal environments, managed to meet the long-term needs of people and nature'.
- 1.4 Conserving and protecting Scotland's seas is important for many reasons. Our sea lochs, bays and estuaries and other water along our coastline, along with the offshore waters from shelf sea areas to deep ocean, provide habitats for around 6,500 species of plants and animals. They also provide widespread benefit through food and energy as well as recreation and tourism.
- 1.5 Marine Protected Areas (MPAs) are a tool which contribute to the vision for our marine environment and help to meet our international commitments on marine protection and conservation.
- 1.6 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.
- 1.7 Features in each possible Marine Protected Area (pMPA) are given one of two conservation objectives: conserve, where evidence exists that the feature is in good condition or there is limited evidence and so uncertainty about its condition; or recover, where evidence exists that the feature is declining and/or damaged.
- 1.8 MPAs sit alongside other tools such as: marine planning, legal protection for some species, Historic MPAs (marine cultural heritage); Special Protection Areas (for seabirds such as puffins and kittiwakes); Special Areas of Conservation (for features such as bottlenose dolphin, coral reefs and seals); and Sites of Specific Scientific Interest (protecting and conserving a range of features from seabirds and seals to sea caves and rocky shores). Fisheries management also contributes alongside this network of protective measures.

- 1.9 The Scottish Government has received advice from Scottish Natural Heritage and Joint Nature Conservation Committee on 33 possible MPAs which have been developed and a further 4 MPA search locations which are still being assessed.
- 1.10 The 'Possible Nature Conservation Marine Protected Areas' consultation sought views on whether the 33 areas should be considered as possible Marine Protected Areas (pMPAs) to supplement the existing protected areas and create a wider network of Marine Protected Areas.
- 1.11 For each pMPA a range of management options has been developed relating to potential risks to the protected features. The management options have been classed as: management to remove or avoid pressures; management to reduce or limit pressures; or no additional management required. Respondents were asked to comment on the management options for the pMPAs and the network as a whole. These related to a variety of areas including:
- renewables;
 - fishing activities – both static and mobile;
 - predators;
 - seismic and geophysical surveys;
 - licensed oil and gas activity;
 - telecommunications cables.
- 1.12 Respondents were also invited to comment on the socioeconomic factors collected for a Sustainability Appraisal of the proposed MPAs and the network.
- 1.13 In addition to the invitation to respond to this consultation, local residents and other interested parties had the opportunity to participate in the consultation through associated meetings and events.

The consultation

- 1.14 The Marine Protected Areas consultation contained 36 questions on the network as a whole, the proposed Marine Protected Areas (pMPAs) and further search locations, and on the Sustainability Appraisal. The consultation questions are listed in Appendix 1.
- 1.15 The consultation ran from 25th July 2013 until 13th November 2013.
- 1.16 Responses to this consultation will inform Scottish Ministers in the decisions on how best to represent features in the network. In addition to the invitation to respond to this consultation, interested parties also had the opportunity to participate through associated events. Reports from Scottish Government events are provided on the Scottish Government website.

Overview of responses

- 1.17 Responses were submitted using the consultation questionnaire, by email or in paper copy. Submissions were received from 14,703 individuals and organisations. This included 332 standard consultation responses.

- 1.18 Standard responses are either unique responses or responses where campaign text has been used as the basis of a response but with amended and/or additional text. The later type are referred to as ‘campaign plus’ responses in tables and commentary throughout this report.
- 1.19 There were some instances of small numbers of respondents submitting the same text; these are mentioned alongside, and included in, the analysis of the relevant questions, as are the campaign submissions.
- 1.20 There were also 14,371 submissions of campaign text; these are detailed in Chapter 2 of this report.
- 1.21 In the very small number of cases where respondents sent in more than one submission, these were merged to form one response. Where exact duplicate responses were received from the same respondent, only one was counted.
- 1.22 In a small number of cases, comments on issues related to the Marine Protected Area consultation were noticed in responses to one of the other Planning Scotland’s Seas consultations; in these cases the respondent and their relevant comments were included in the MPA consultation.

Respondent profile

- 1.23 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. The following table shows the numbers of responses in each group.

Table 1.1
Respondent groups

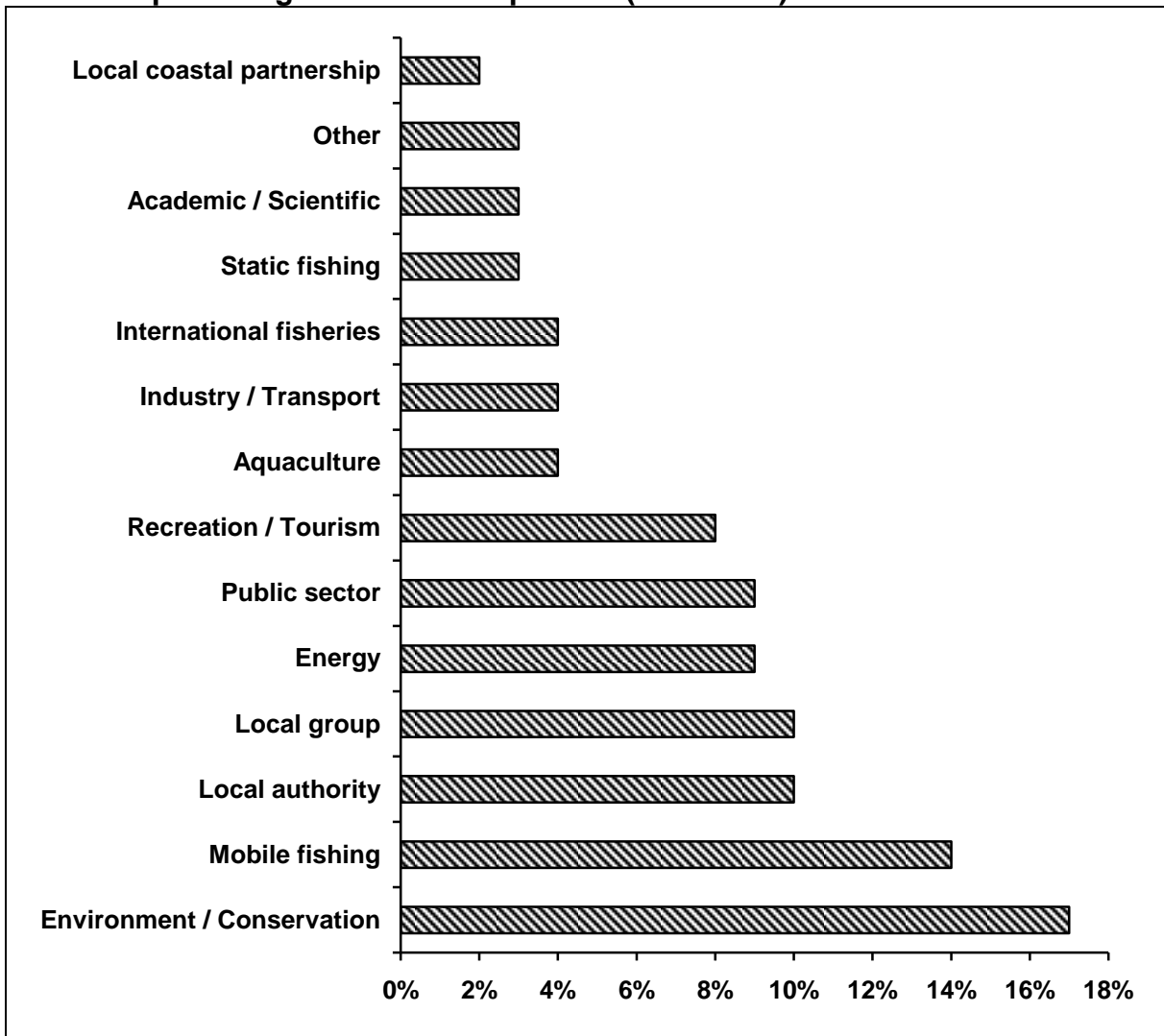
	Number
Total individuals	216
Organisations:	
Academic / Scientific	3
Aquaculture	5
Energy	10
Environment / Conservation	20
Industry / Transport	5
International fisheries	5
Local authority	12
Local coastal partnership	2
Local group	12
Mobile fishing	16
Public sector	10
Recreation / Tourism	9
Static fishing	3
Other	4
Total organisations	116
Total standard responses	332

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

1.25 The following chart shows the sectoral split of the organisational responses.

Chart 1.1

Sectoral split of organisational responses (Base: 116)



1.26 In addition to the 332 standard responses, there were 14,371 campaign submissions and these are described in the next chapter.

Analysis and reporting

1.27 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.

1.28 Where possible, we looked at whether respondents said they agreed or disagreed with the specific proposals; however as most questions did not specifically ask for this information, it was not possible to ascertain support or disagreement for every respondent; this should be borne in mind when reading any proportions mentioned in the reporting.

- 1.29 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.
- 1.30 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.
- 1.31 It should 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.
- 1.32 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.
- 1.33 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.
- 1.34 Appropriate verbatim comments, from those who gave permission for their responses to be made public, are used throughout the report to illustrate themes or to provide extra detail for some specific points.

2 NON-STANDARD RESPONSES

2.1 The consultation attracted a number of different response formats; where respondents used alternative questionnaires or submitted campaign text. In total 14,371 respondents submitted non-standard responses and these are outlined below.

Table 2.1
Non-standard responses (campaigns) overview

	Number
Protection for seabirds	1,626
Protection for whales and dolphins	6,627
Support for the MPA network	4,803
Support for the South Arran pMPA	1,315
Total	14,371

Campaigns relating to seabirds

2.2 There were three similar seabird campaigns resulting in a total of 1,626 submissions. The texts submitted by large numbers of respondents, in relation to seabirds, are set out below.

2.3 The following text was submitted by 1,611 respondents either by email or hard copy.

I fully support Marine Protected Areas (MPAs) for seabirds but I'm disappointed that the Scottish Government's proposed network of MPAs fails to include feeding areas for the majority of Scotland's iconic seabird species.

Seabird populations have dramatically declined over the past three decades. Currently seabirds are only protected on land – they need MPAs to protect them, and their feeding areas, at sea. At the moment seabirds only have a safe place to starve.

The Firth of Forth is the most important site on our coastline for sandeels, which are an essential source of food for Scotland's seabirds. This site must be protected and so should others like it.

I support the MPAs proposed for black guillemot, and believe all other seabird species should have similar protection. The Scottish Government must take action now and designate MPAs for seabird feeding areas to help stop these declines before our cliffs fall silent.

2.4 There were also smaller instances of similar campaign texts being submitted; five respondents submitted a fuller version of the text relating to a lack of protection for seabirds and support for the Firth of Forth Complex pMPA. Ten respondents submitted a shorter version of this text.

2.5 In addition, many individuals (48) submitted extended versions of one of these campaign texts supporting the protection of black guillemots. These campaign

plus responses¹ have been included in the count of standard consultation responses. These respondents commented that black guillemots are under threat and echoed the campaign text supporting the designation of the 6 pMPAs which include black guillemot: Clyde Sea Sill, East Caithness Cliffs, Fetlar-Haroldswick, Monach Isles, Papa Westray and the Small Isles. Many of these respondents also wanted to see protection for other seabirds in general. Some specified the species they would like to see protected and suggestions included common guillemot, gannet, puffin, razorbill, kittiwake, black-legged kittiwake, shearwater, skua, petrel and gulls.

Campaigns relating to whales and dolphins

2.6 Another subject that attracted campaign responses was protection for whales and dolphins. Submissions from 6,627 respondents included campaign text with a further 13 instances of campaign plus responses, responses based on the campaign text, calling for greater protection for whales, dolphins and porpoises.

2.7 The following text was submitted by 6,037 respondents.

Scotland's whales and dolphins need MPA protection!

I fully support a Scottish MPA network and what the government is proposing is a good first step. But a coherent MPA network must include sites for whales and dolphins.

Scotland has more whales and dolphins than anywhere else in northern Europe, but they haven't been included in the proposed MPA designations. WDC provided scientific evidence for whale and dolphin MPAs, with the support of more than 36,000 advocates.

Alongside those 29 MPAs proposed by the government's own nature conservation advisors, Scottish Natural Heritage (SNH) and Joint Nature Conservation Committee (JNCC), please designate MPAs for whales and dolphins without delay.

The MPA network must be built upon. More species and habitats must be protected by the network and clear evidence supports this need, including for harbour porpoises.

Thank you for developing an MPA network that we hope will be well managed and world-leading. I strongly advocate and support will spread and share the word on this so others may want to help support your positive support for the dolphin/whale habitat

2.8 There were 225 submissions of a proforma with the following text. In this case, respondents could add their own comments to the text and many included their support for MPAs or conservation for whales, dolphins and porpoises.

¹ Campaign plus responses are described in paragraph 1.18

I fully support a Scottish Marine Protected Area (MPA) network, and what the government is proposing is a good first step. But, a coherent MPA network must include sites for whales and dolphins.

Scotland has more whales and dolphins than anywhere else in northern Europe, but they haven't been included in the proposed MPA designations. WDC, Whale and Dolphin Conservation provided scientific evidence for whale and dolphin MPAs, with the support of more than 36,000 advocates.

Alongside those 29 MPAs proposed by the government's own nature conservation advisors, Scottish Natural Heritage (SNH) and Joint Nature Conservation Committee (JNCC), please designate MPAs for whales and dolphins without delay.

The MPA network must be built upon. More species and habitats must be protected by the network and clear evidence supports this need, including for harbour porpoises.

Thank you for developing an MPA network that we hope will be well managed and world-leading.

- 2.9 Another proforma on this subject also allowed respondents to add comments and many of the 365 who submitted this commented on their support for marine protected areas or conservation for wales, dolphins and porpoises.

Alongside those marine protected areas (MPAs) proposed by Scottish Natural Heritage there is good evidence to immediately include whales, dolphins and porpoises, please designate MPAs for whales and dolphins without delay.

The MPA network must be built upon. More species and habitats must be protected by the network and clear evidence supports this need, including for harbour porpoises.

Effective management should restrict damaging activities in each MPA so that adequate protection and recovery is possible within and beyond the boundaries of the site.

I fully support a Scottish MPA network and what the government is proposing is a good first step. Thank you for developing an MPA network that we hope will be well managed and world-leading.

Campaigns relating to the MPA network

- 2.10 There were also campaign responses in relation to the network; 4,803 respondents submitted one of the following.

- 2.11 There were 2,615 submissions of the following text.

To whom it may concern,

I am writing in response to the Scottish Government consultation on Possible Nature Conservation Marine Protected Areas. From Scotland's Marine Atlas it is clear that the seas around Scotland are in turmoil, with concerns and declines over most of the seabed, declines in common seals, seabirds and sharks, skates and rays, and ongoing concerns with fish stocks in many areas. Within a system that puts the marine environment at the centre of marine planning, I believe a network of well-managed Marine Protected Areas is essential to help reverse these historic declines and enhance the many important benefits the sea provides us all.

In answer to question 1, I firmly support the development of an MPA network in Scotland's seas. Of the 33 MPA proposals in the consultation, I want to see at least the 29 ecologically best choice sites designated as nature conservation Marine Protected Areas in line with scientific advice.

In answer to question 28, the Firth of Forth Banks MPA proposal must go forward to best represent offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the southern North Sea in line with JNCC advice. The other choices presented do not make the same contribution to wider North Sea ecosystem function, are not ecologically equivalent and therefore are not acceptable alternatives. Sandeels and seabirds should also be protected features at Firth of Forth Banks.

In answer to question 30, core Central Fladen must be protected in line with scientific advice and I support the 'Central Fladen pMPA only' option to be included in the network. This would be the most ecologically coherent option, providing scope for tall sea pen recovery beyond what may be a remnant population in 'core' Central Fladen.

In answer to question 34, I do have a comment on the Sustainability Appraisal. I believe the Sustainability Appraisal does not fully account for the socioeconomic benefits that could arise from the proposed MPA network. For example, a recent study revealed that recreational diving and angling in 20 of the proposed MPAs in Scotland is valued at between £67 million and £117 million per year. In addition, divers and anglers questioned said they would make a one-off payment collectively worth between £142-£255 million to see these sites protected and damaging activities stopped. Similar studies are needed to demonstrate the benefits of the Scottish MPAs to other user groups.

In answer to question 35, even if the best 29 sites and the remaining four search locations become MPAs as I would like, I still do not view this to be an ecologically coherent network. Other species in need of MPA protection - such as spiny lobsters, heart cockle aggregations and burrowing anemones - must be added to future iterations of the network. Further MPAs for common skate and nationally important MPAs for seabirds are also needed. I will only consider the network ecologically coherent when all species and habitats that can benefit from spatial protection are adequately represented and when robust science shows the network supports and enhances the ecological linkages between the different MPAs.

(continued)

In answer to question 36, I do have further comments. The Scottish Government has a legal obligation to enhance Scotland's seas and, according to international recommendations, the MPA network must support the wider marine environment. For each MPA, effective management must therefore be in place so that species and habitat recovery is possible both within and beyond the boundaries of the site. Zonal management that protects only the remnant extent of marine species and habitats, particularly of vulnerable benthic features, is not enough given the context of ecological decline documented in Scotland's Marine Atlas.

2.12 There were 662 submissions of the following text.

Recover our seas with Marine Protected Areas

In response to the Scottish Government's consultation on Marine Protected Areas questions 1, 28, 35 and 36:

I support the proposals for a network of Marine Protected Areas in Scotland's inshore and offshore waters, but believe more must be done to protect, connect and actively recover the health of our seas, which has suffered long-term decline over many generations.

Therefore, the Scottish Government must implement the ecologically best 29 Marine Protected Area proposals, as recommended by its own scientific advisors (Commissioned report no. 547 Advice to the Scottish Government on the selection of nature conservation Marine Protected Areas (MPAs) for the development of the Scottish MPA network - <http://www.snh.gov.uk/docs/A990246.pdf>). Evidence suggests that the features within the Firth of Forth Banks Complex are of functional significance to the overall health and diversity of Scotland's seas more widely. The Firth of Forth Banks MPA therefore must be designated, because it is JNCC's preferred proposal and the suggested alternatives to the site do not make equivalent contributions to the network.

I do not believe the proposed network to be ecologically coherent. I firmly urge the Scottish Government to extend the MPA proposals to protect vulnerable species excluded from the proposed network. There is already good evidence to support the immediate inclusion of whales, dolphins, basking sharks and nationally important populations of seabirds, such as puffins and kittiwakes. These - and those species already dropped from the proposals; spiny lobsters, heart cockle aggregations, burrowing anemones - must be added to the network. The network will only be ecologically coherent when all species and habitats that can benefit from spatial protection are adequately represented and when sound, properly-resourced science shows it to be based on the ecological linkages between the different MPAs.

International recommendations say a network of MPAs must interact and support the wider environment and the Scottish Government has a legal obligation to enhance Scotland's seas. For each MPA, the strongest and most effective management must be in place so that recovery is possible within and beyond the boundaries of the site. Zonal management that puts in place measures to protect only the remaining coverage of species and habitats is not enough, given the context of ecological decline documented by Scotland's Marine Atlas.

2.13 There were 1,526 submissions of the following text.

I care about the future of Scotland's seas and believe that the creation of a well-managed network of Marine Protected Areas (MPAs) is vital so that we can continue to enjoy the many benefits of healthy marine ecosystems.

Please find my response below to questions 1, 28 and 35 of the MPA consultation:

1. I support the development of a network of MPAs in Scotland's seas. I believe the proposed Nature Conservation MPAs must be designated in line with scientific advice, and be supported by effective management that ensures the conservation and recovery of marine ecosystems.

28. The Firth of Forth Banks is unique and must be designated as a Nature Conservation MPA. The scientific advice clearly recommends the designation of this site over the alternative proposal of Turbot Bank and Norwegian Sediment Plain.

35. The network of MPAs as consulted on is not complete and the Scottish Government must commit to creating additional MPAs as soon as possible to protect species including basking shark, minke whale, white-beaked dolphin, Risso's dolphin, common skate and sites for birds at sea.

Campaigns relating to the South Arran pMPA

2.14 The South Arran pMPA also attracted campaign responses. Submissions from 1,315 respondents included campaign text.

2.15 One version of the campaign text supporting the South Arran pMPA attracted 726 responses.

I agree with the location and designation of the proposed South Arran Marine Protected Area as part of an ecologically coherent network of Clyde and Scottish MPAs. The area proposed around the South of Arran is a positive step forward and will help the sea bed and sea life to recover, but will only be effective if bottom trawling and dredging is prohibited from the whole area. In my view the MPA should extend all around Arran and be linked to Clyde-wide spatial and effort control measures designed to recover the health and productivity of the Clyde Sea. Black guillemot should be included as marine priority feature of the Arran MPA.

I support COAST's proposed management options and disagree with Scottish Natural Heritage's management recommendations. All bottom towed trawls, dredgers and hydraulic gear should be excluded from the entire proposed MPA not just from a few areas as SNH propose. This is vital if we are to conserve and recover the nature conservation features throughout the proposed MPA. Properly managed creeling, shellfish diving, and angling should be allowed.

A healthy and productive Clyde Sea is essential to the economy of coastal communities around the Clyde and the West of Scotland. Increased biodiversity and productivity will benefit commercial fishermen, recreational sea anglers and also tourism, which is the most important economic driver in the Clyde.

The Scottish Government has a legal obligation to achieve good environmental status in Scottish waters by 2020 and must be able to demonstrate a well-managed network of MPAs are in place by the end of 2016. MPAs should be regarded as integral to the achievement of healthy and productive seas and effective ecosystems management. It is not good enough to view them as simply a way of protecting a few 'relic' species and habitats. The Government needs to show that it is managing our seas for the benefit of everyone in Scotland.

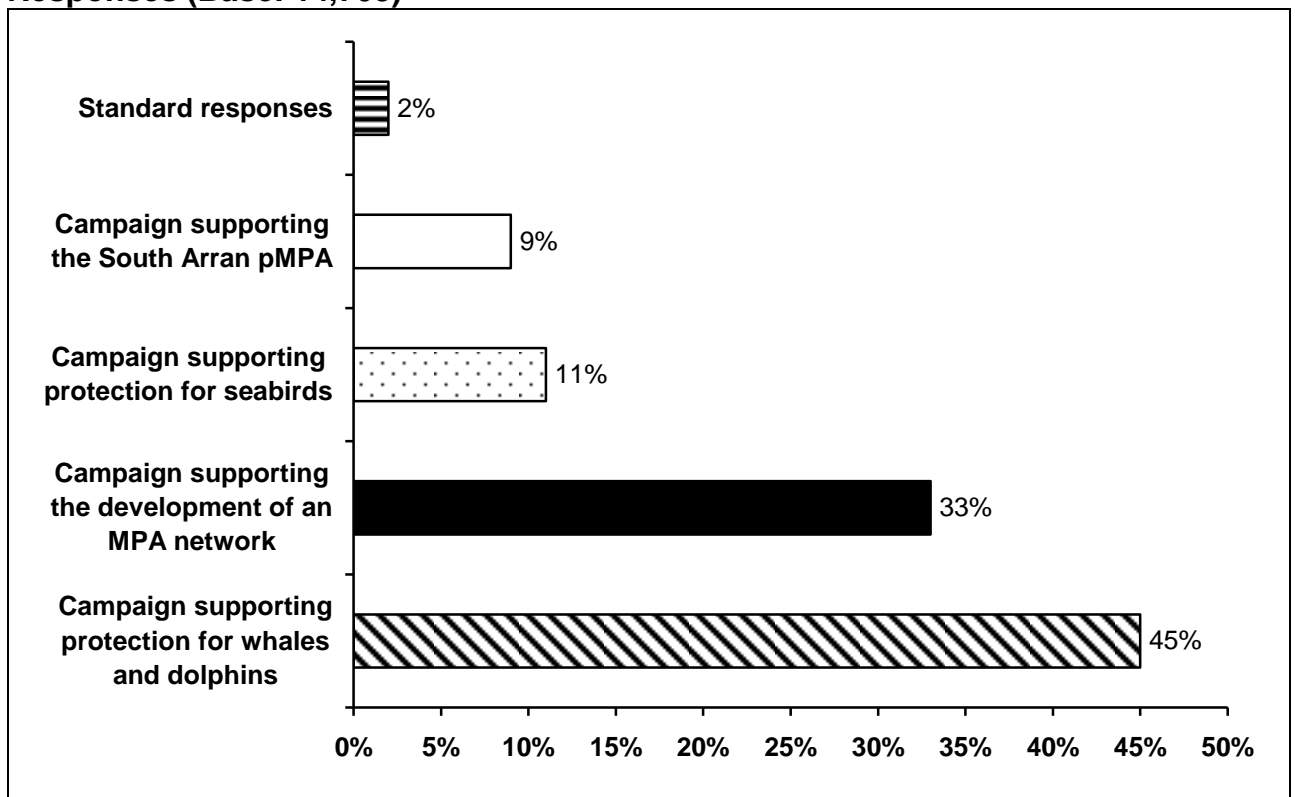
2.16 In addition, 44 individuals submitted campaign plus versions; an amended or extended version of this text; and these have been included in the analysis alongside the standard responses.

2.17 There were also 589 submissions of an alternative questionnaire focussed on the South Arran pMPA. Respondents answered the question 'Do you support the development of an MPA network in Scotland's Seas (with 3 MPAs in the Clyde)?' and commented on the South Arran pMPA designation, management options and socioeconomic assessment.

These respondents said yes to MPAs and to the South Arran pMPA, asked for a ban on fishing, said that MPAs would boost tourism and asked that the whole of Arran, rather than just the South, should be designated.

2.18 The following chart shows the origins of all responses to this consultation.

Chart 2.1
Responses (Base: 14,703)



3 THE MPA NETWORK

- 3.1 The marine environment of the North-East Atlantic is protected under the OSPAR Convention (The Convention for the Protection of the Marine Environment of the North-East Atlantic) which was signed by 15 countries and the European Union. The Convention covers the prevention and elimination of pollution and protection against adverse effects from human activities, although fisheries and shipping are not covered by OSPAR. Other international commitments include the World Summit on Sustainable Development, the Convention on Biological Diversity and the EU Marine Strategy Framework Directive.
- 3.2 Scotland's seas fall within three OSPAR Regions: Region II (Greater North Sea), Region III (Celtic Seas) and Region V (wider Atlantic).
- 3.3 At present Scotland's seas have 46 Special Areas of Conservation, 45 seabird colony Special Protected Areas, 61 Sites of Specific Scientific Interest in the marine environment, and 8 fisheries management areas.
- 3.4 The consultation looked at 33 possible MPAs (pMPA) some or all of which will along with the measures above, form an MPA Network giving protection to over 23% of Scotland's marine environment. In addition, four search locations are still being assessed. The proposed MPAs are listed in Appendix 3.

Support for an MPA network

- 3.5 The first question in the consultation asked 'Do you support the development of an MPA network in Scotland's Seas?' and Table 3.1 shows the responses.
- 3.6 A campaign questionnaire containing questions on the South Arran MPA also asked about support for an MPA network but was worded slightly differently: 'Do you support the development of an MPA network in Scotland's Seas with 3 MPAs in the Clyde?' A small number of respondents submitted campaign plus² responses based on this questionnaire and are included in the count of standard responses. Ten respondents in the 'yes' column in Table 3.1 (eight individuals, one recreation / tourism and one local group) answered this version of the question, as did one individual in the 'no' column.
- 3.7 In addition, not all respondents used the tick box form; some gave their answers in a more free-flowing format such as a letter. Where respondents did not tick a box but mentioned within their comments support for or opposition to an MPA network, these responses have been included in the 'yes' and 'no' counts below.
- 3.8 As can be seen in the following table, most respondents (257) supported the development of an MPA network in Scotland's seas. Few (12) said that they did not and these respondents came from the individual and mobile fishing groups.

² Campaign plus responses are described in paragraph 1.18

Table 3.1
Whether support the development of an MPA network in Scotland's Seas

	Yes	No	Other comments	No reply
Individuals (216)	184	10	18	4
Academic / Scientific (3)	3	-	-	-
Aquaculture (5)	1	-	4	-
Energy (10)	4	-	5	1
Environment / Conservation (20)	19	-	1	-
Industry / Transport (5)	3	-	-	2
International fisheries (5)	1	-	-	4
Local authority (12)	6	-	3	3
Local coastal partnership (2)	2	-	-	-
Local group (12)	11	-	-	1
Mobile fishing (16)	4	2	8	2
Public sector (10)	6	-	-	4
Recreation / Tourism (9)	8	-	1	-
Static fishing (3)	2	-	-	1
Other (4)	3	-	-	1
Total (332 standard responses)	257	12	40	23

3.9 The respondents counted in the 'other comments' column had a range of views. Instead of outright support, many of these respondents gave support with a proviso and their suggestions or concerns are discussed later in this chapter. In addition, several respondents commented that they support the principle of MPAs; these respondents came from the energy, marine fishing, aquaculture and local authority sub-groups. A small number of respondents implied their support or lack of support rather than stating it outright.

3.10 Finally, a small number simply commented without giving an indication of support or otherwise. These included some of the respondents who did not address the consultation questions directly; these responses are included in the 'no-reply' column in the table above and chart below.

3.11 The following charts shows support and opposition to the development of an MPA network from standard responses, both overall and by respondent type.

Chart 3.1

Whether respondents support the development of an MPA network in Scotland's Seas (Base: 332)

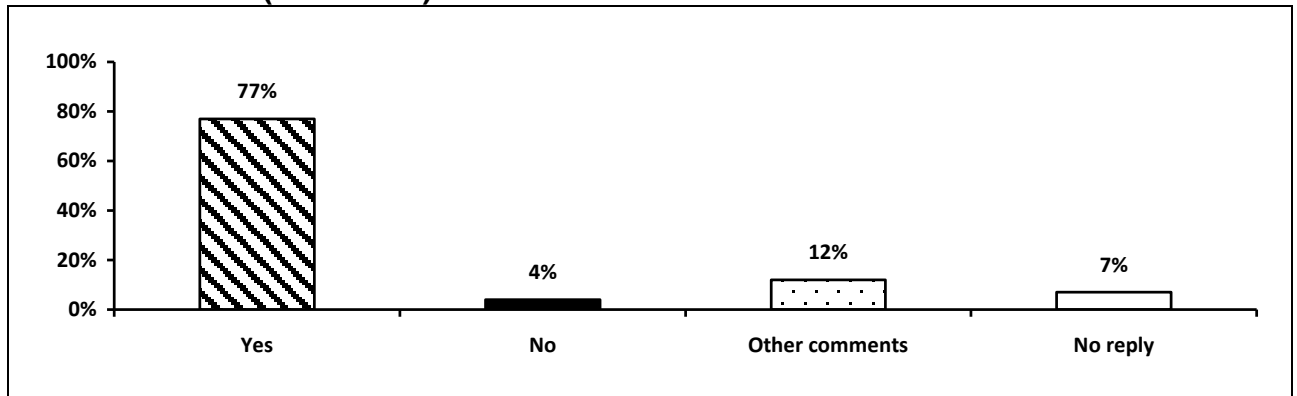
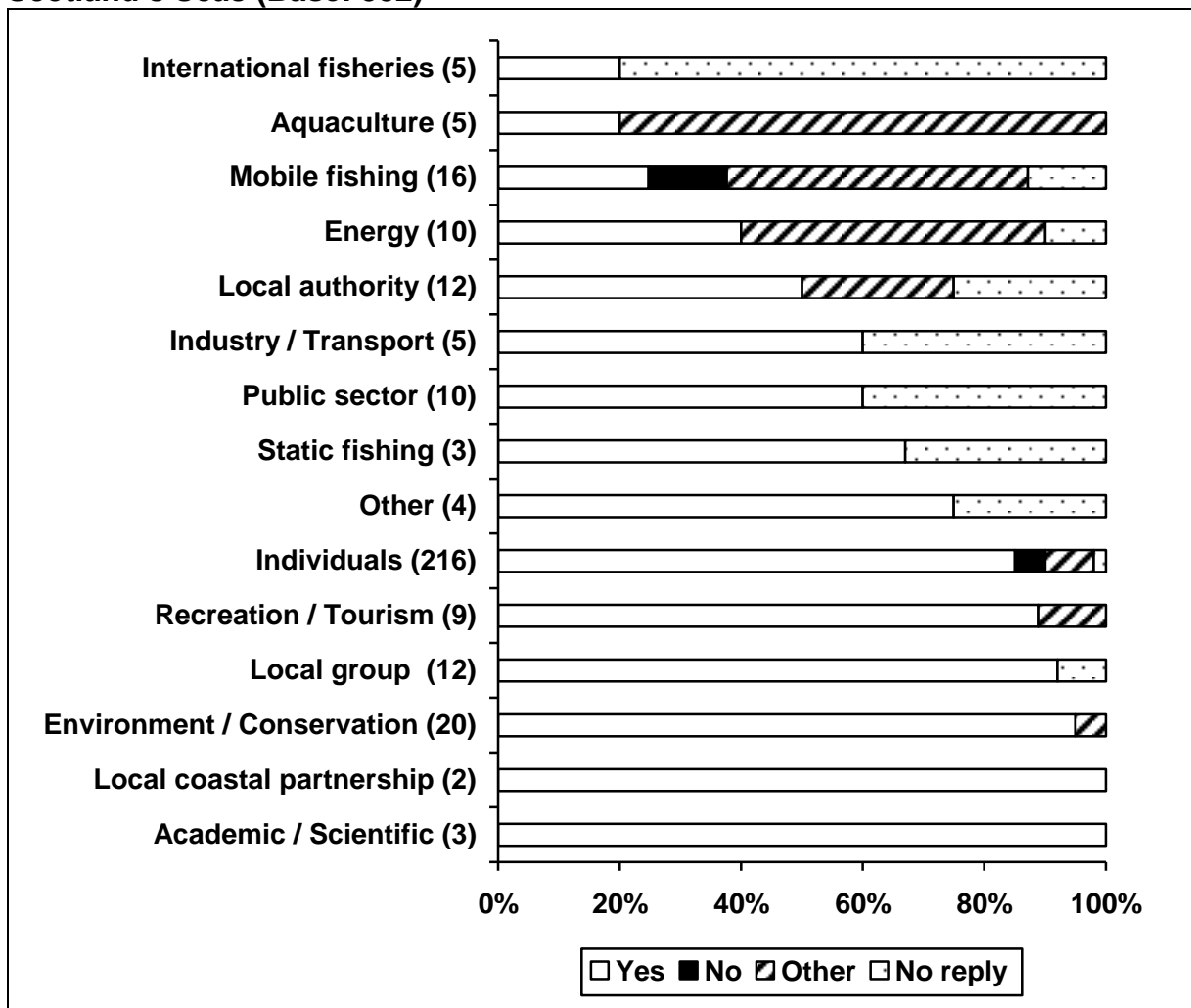


Chart 3.2

Whether respondents support the development of an MPA network in Scotland's Seas (Base: 332)



3.12 As detailed in Chapter 2, all of the campaign texts included some form of support for an MPA network.

Overall, of the 14,703 responses, over 99% supported an MPA network:

- a very small number (12) did not support an MPA network;
- almost all (14,628) supported an MPA network;
- a small number (63) did not comment on support or opposition;

3.13 Full details of support for a network are given in Table 3.2.

Table 3.2
Total support for an MPA network in Scotland's Seas

	Support
I fully support Marine Protected Areas (MPAs) for seabirds but I'm disappointed that the Scottish Government's proposed network of MPAs fails to include feeding areas for the majority of Scotland's iconic seabird species [and variations]. (seabird campaigns)	1,626
I fully support a Scottish MPA network and what the government is proposing is a good first step. But a coherent MPA network must include sites for whales and dolphins. (whales and dolphins campaign)	6,262
I fully support a Scottish MPA network and what the government is proposing is a good first step. Thank you for developing an MPA network that we hope will be well managed and world-leading. (whales and dolphins campaign)	365
I firmly support the development of an MPA network in Scotland's seas. Of the 33 MPA proposals in the consultation, I want to see at least the 29 ecologically best choice sites designated as nature conservation Marine Protected Areas in line with scientific advice. (network campaign)	2,615
I support the proposals for a network of Marine Protected Areas in Scotland's inshore and offshore waters, but believe more must be done to protect, connect and actively recover the health of our seas, which has suffered long-term decline over many generations (network campaign)	662
I support the development of a network of MPAs in Scotland's seas. I believe the proposed Nature Conservation MPAs must be designated in line with scientific advice, and be supported by effective management that ensures the conservation and recovery of marine ecosystems. (network campaign)	1,526
Yes to 'Do you support the development of an MPA network in Scotland's Seas' or 'Do you support the development of an MPA network in Scotland's Seas with 3 MPAs in the Clyde' (South Arran campaign)	589
I agree with the location and designation of the proposed South Arran Marine Protected Area as part of an ecologically coherent network of Clyde and Scottish MPAs. (South Arran campaign)	726
Support (standard responses)	257
Total	14,628

Key themes

3.14 The key themes that emerged from standard responses on an MPA network are outlined in the following paragraphs.

3.15 Many of the respondents who commented at this question stressed the need for protection for the marine environment. Many, especially individuals, used words such as vital and essential to describe their support for an MPA network.

3.16 Respondents commented that it this will protect the seas for generations to come; that it is welcomed but it has been a long time coming; and that it is welcome, as it will halt damage that has been done to the environment and fish stocks. Examples included:

“The protection of these sensitive and environmentally diverse areas is essential to the long-term health of the seas around Scotland.” (individual)

“[the respondent] asserts that the creation of this MPA network is the most important marine conservation measure in Scotland’s history.” (environment/conservation)

3.17 The importance of the network in improving biodiversity and recovering a sustainable inshore fishery was stressed. Many respondents also welcomed measures to protect against trawling and dredging which were seen as causing harm in many areas; although there were also several who opposed this view.

3.18 A small number felt that the proposed network was not as extensive as they would wish. Others, mainly from the fishing interests, felt the sites should only cover locations where the protected features exist, rather than a geographical area, and that more work on identifying these locations is required.

3.19 Protection for seabirds across the MPA network featured in campaign responses and in many responses from individual respondents at this question.

3.20 While many organisations commenting at this question supported an MPA network, again words such as essential were used, several (mainly from energy, aquaculture, mobile fishing and local authorities) said that while they support the principle, they have reservations about the proposals. These reservations included comments on designation, management options and socio-economic effects:

- The need to ensure a science-based approach to designation.
- The need for full data before designation.
- The need to consult on and agree management options before designation.
- The need to ensure management options do not cause any adverse socioeconomic effects on local communities.
- For management options to take account of the need for energy provision.
- The need for fish production to be allowed to continue and to develop in appropriate areas, including in MPAs, for example:

“It is important to make the point in this consultation that we have existed for many years, operating in a fully sustainable manner under the terms of existing regulations. Our company would like to ensure that we will be able to continue to operate and develop by ensuring we continue to be both economically viable and technologically up to date, while taking account of the species and features that are offered protection under the MPA scheme” (aquaculture).

Summary

Almost all of the 14,703 responses included support in some form for an MPA network. Specific protection was requested for seabirds and for whales and dolphins.

Many commented on the need to ensure a science-based approach to designation and many stressed the need for good management to ensure adequate protection for the environment and to prevent unnecessary impact on marine users.

4 KEY THEMES

- 4.1 Several key themes emerged from responses and these are outlined below:
- 4.2 There were some species that, many respondents felt, had been overlooked and these included: seabirds; whales; dolphins; and porpoises. Support for protecting these species came through a very large number of campaign responses as well as in standard consultation responses; particularly from individuals and the environment/conservation group. There were comments that the proposed network would offer protection to only 39 of the 6,500 species and habitats in Scotland's seas. This would mean that the network was not ecologically coherent and therefore not meet the duty under the Marine Act as well as failing to meet international commitments.
- 4.3 Seabirds were the focus of many responses and respondents commented on recent data predicting that some colonies could soon become extinct.
- 4.4 Increasing threats such as lack of food and climate change have affected a variety of species such as common guillemots, razorbills and puffins and respondents reported that other species such as in Arctic skua and black-legged kittiwake had seen significant declines in their populations. A large number supported the sites designated for the protection of black guillemot but many also commented that this is only one out of 24 species that could and should be protected. However, it was not clear from responses how Marine Protected Areas would directly protect seabirds from threats such as lack of food or climate change.
- 4.5 The feeling that the network should protect more species was the main reason given by those who said that the proposed network is not complete or ecologically coherent.
- 4.6 Several respondents talked about the need to look at cumulative effects as well as effects in each pMPA; for example, the need to look at the collective impacts and benefits from the three Clyde pMPAs, or from the network overall.
- 4.7 Environment/conservation respondents said that the management measures proposed support the status quo rather than making every effort to regenerate biodiversity across the proposed MPA network.
- 4.8 A number of respondents commented on existing protected areas such as SACs and SPAs and wanted to see effective management in these areas and, where there is an overlap or sites are close to a pMPA, for the management of the MPA to refer to, and align with, the objectives of the existing site.
- 4.9 There were concerns over conflicts between Government targets for renewables and its goals for the marine environment. Allied to this, respondents from the energy and public sector groups asked for clarification and more certainty over the interaction of MPAs with existing and proposed installations and assets, for example pipelines and cables for oil and gas, renewables, and telecommunications sectors. There was some concern that uncertainty over management measures would discourage investors.

- 4.10 The international fisheries respondents voiced concern over the economic impacts to their fleets from the proposals and suggested alterations that would still meet environmental objectives.
- 4.11 Responses from the Scottish fishing sector came from both static and mobile fishing interests.
- 4.12 The static fishing respondents wanted to see what they feel are non-damaging forms of fishing, such as creeling, shellfish diving, and angling allowed to continue within the pMPAs, but supported a ban on bottom dredging and trawling. Many individuals as well as some from the tourist/ recreation and environment/conservation groups also wanted to see methods such as bottom dredging and trawling removed from MPAs.
- 4.13 Mobile fishing respondents commented that their methods have been in use for many years without evidence of damaging the environment; many individuals said they believed the opposite to be true.
- 4.14 There was surprise, mainly from aquaculture and mobile fishing respondents, over the number of pMPAs and the size of the proposed areas; these respondents suggested smaller more localised areas would be more appropriate, targeting more specifically the habitats and species designated for protection. Respondents commented that a lack of knowledge about the extent or location of a species should not be used to create a larger area. There was also some disappointment that more alternative sites had not been identified.
- 4.15 A number of respondents wrote in support of the Skye to Mull search location being designated.
- 4.16 Mobile fishing respondents expressed concern over what they termed a lack of regard to both legislative and policy frameworks, which had led them to be unable to support many of the proposals. Respondents felt that these had not been adhered to in relation to network design, OSPAR obligations and replication in particular. This group felt that the resulting impact on mobile fishing would have disproportionate consequences for both individual concerns and on coastal communities as well as for food security.
- 4.17 Some of the mobile fishing respondents included a list highlighting the species and habitats that do not appear on the OSPAR Threatened/Declining List that they said should not, therefore, appear as a supporting item for MPA designation. These respondents mentioned the black guillemot, in particular, as not being on the OSPAR list of threatened species.
- 4.18 Several respondents commented on the need for more data and for all decisions to be science-led and based on up-to-date, verified data. Others also called for an external review of the quality and use of evidence used to underpin the pMPA recommendations.
- 4.19 Robust management and involving all stakeholders, in particular local communities, in managing MPAs was seen as important.

4.20 Many of the comments above were made in relation to one or more of the individual pMPAs. Respondents commented on particular species to include at each site or commented on the size or boundaries or the particular needs of those who live, work or visit the area.

4.21 Overall, there was broad support for the possible Marine Protected Areas.

5 POSSIBLE MARINE PROTECTED AREAS

- 5.1 While a large number overall responded to the consultation, individuals in particular commented on only one pMPA; ones that were close to their home or of interest to them. This means that at the questions on each of the pMPAs there are fairly small numbers responding. Details of comments on each individual site are given in the next chapter.
- 5.2 Through these site summaries, tables show the total numbers commenting; this includes standard, campaign plus and campaign responses.
- 5.3 The following table gives an indication of the location of individuals who submitted standard responses and those who submitted campaign plus responses³ on each of the sites, based on the postcodes supplied. Those in the 'lives near area' column live in the local authority areas closest to the pMPA.
- 5.4 As can be seen in the following table, Loch Creran attracted the fewest comments (one) while the Small Isles attracted the most (61).

Table 5.1
Location of individual respondents in relation to territorial pMPAs

pMPA	Standard responses			Campaign plus		
	Lives near area	Lives outwith area	No post-code	Lives near area	Lives outwith area	No post-code
Clyde Sea Sill	5	3	2	13	29	6
East Caithness Cliffs	-	5	1	5	38	5
Fetlar to Haroldswick	2	5	-	-	43	5
Loch Creran	-	1	-	-	1	-
Loch Sunart	1	3	-	-	1	-
Loch Sunart to the Sound of Jura	1	2	1	-	1	-
Loch Sween	1	2	-	-	1	-
Lochs Duich, Long and Alsh	2	1	-	-	1	-
Monach Isles	-	3	-	-	43	5
Mousa to Boddam	1	2	-	-	2	-
North-west Orkney	1	2	-	-	1	-
NW sea lochs and Summer Isles	12	4	2	-	1	-
Noss Head	-	2	-	-	1	-
Papa Westray	1	4	-	1	42	5
Small Isles	6	7	-	3	40	5
South Arran	4	4	1	28	17	1
Upper Loch Fyne and Loch Goil	5	3	2	1	1	-
Wyre and Rousay Sounds	-	3	-	-	-	-

- 5.5 As the following table shows, only a small number of individuals commented on offshore pMPAs.

³ Campaign plus responses are described in paragraph 1.18

Table 5.2**Location of individual standard respondents in relation to offshore pMPAs**

pMPA	Individuals responding
East of Gannet and Montrose Fields	3
Faroe-Shetland sponge belt	4
Hatton-Rockall Basin	2
North-east Faroe Shetland Channel	3
Rosemary Bank Seamount	2
The Barra Fan and Hebrides Terrace Seamount	2
Turbot Bank	2
West Shetland Shelf	4

5.1 CLYDE SEA SILL

5.1.1 The protected features that the Clyde Sea Sill pMPA will **conserve** are:

- Biodiversity: Black guillemot, fronts, and circalittoral sand and coarse sediment communities
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed

5.1.2 Respondents were asked: ‘Do you have any comments on the case for designation, management options and socioeconomic assessment for the Clyde Sea Sill possible Nature Conservation MPA?’ and 32 respondents commented; ten individuals and 22 organisations across organisation types. Many other individuals (48) submitted a campaign plus response, as described in Chapter 1, calling for the protection of black guillemots and for other seabirds to be protected in this area. The table below shows the total numbers commenting on this pMPA.

Table 5.3
Number commenting on the Clyde Sea Sill pMPA

	Number commenting
I support the MPAs proposed for black guillemot, and believe all other seabird species should have similar protection. The Scottish Government must take action now and designate MPAs for seabird feeding areas to help stop these declines before our cliffs fall silent [and variations]. (seabird campaigns)	1,626
Campaign plus responses	48
Standard responses	32
Total	1,706

Designation

5.1.3 This pMPA is one of three proposed in the Clyde area, along with Upper Loch Fyne and Loch Goil and South Arran; many comments on this pMPA relate to all three of these sites.

5.1.4 One environment/conservation respondent asked that their third-party proposal to extend the Sanda Island SSSI to protect razorbills be reconsidered and commented on the importance of the area for a range of seabird species.

5.1.5 A small number of respondents commented on the need to include protection for the kelp forests. Three environment/conservation respondents expanded on this issue asking that kelp habitats are added to the protected features as they support not only black guillemot but also the wider ecosystem. These respondents also commented on the importance of the front and suggested mobile species that benefit from the effects of the front “should be afforded protection where qualifying criteria dictate.”

5.1.6 Clarity on the descriptors of the front was requested as was work to understand the effects of the front in the area.

- 5.1.7 Another environment/conservation respondent felt that the 'conserve' status given to the protected features in the area should be changed to 'recover' although another from the same group supported the 'conserve' status.
- 5.1.8 There was also support for the other biodiversity protected features; circalittoral sand and coarse sediment communities, and fronts.
- 5.1.9 However, three of the mobile fishing respondents commented on this pMPA and said that the protected features are "Not noted as threatened features on the OSPAR list of Threatened/declining Species and Habitats" while an individual commented that the Black Guillemot was classified by Birdlife International as 'least concern'.
- 5.1.10 Several respondents pointed out that data used for species counts are 15 years out of date and wanted to see this addressed.
- 5.1.11 A small number of the organisations, recreation/ tourism, local authorities and public sector, simply noted the proposals for the Clyde Sea Sill or voiced their support for this pMPA.

Management options

- 5.1.12 In relation to the management options on renewables, one energy respondent commented that cables will pass through the area for a renewables projects and that this may cause a temporary impact on habitat and marine birds. Commenting on another proposed development, another energy respondent asked for the probable cable route through the Clyde Sea Sill area to be recognised within the management options.
- 5.1.13 Environment/conservation respondents however wanted to see the impacts of various installations in or proposed for the area assessed fully. One wanted to see monitoring work and mitigation of the impact of installations and cables on bottlenose dolphin, minke whales and basking shark and for site management to consider these species, along with the harbour porpoise.
- 5.1.14 The management options for static and mobile fishing gear were welcomed by some organisations, mainly from the environment/conservation group, as were the options against the introduction of predators.
- 5.1.15 In relation to reducing or limiting pressures from demersal mobile/active gear, one environment/conservation respondent commented that this would need to be "fully discussed with skippers in the area and other stakeholders (including environmental and wider community stakeholders)".
- 5.1.16 In relation to the three pMPAs in the Clyde, one environment/conservation respondent wanted to see a more holistic approach to fisheries management measures.
- 5.1.17 A small number of respondents noted and appreciated that anchorages are not considered capable of affecting the protected features.

Socioeconomic aspects

- 5.1.18 Respondents across various organisational groups felt that designation would be beneficial to the area in terms of the economy and well-being; some respondents cited studies around these subjects. Sea-bird and wildlife tourism is considered by respondents as already important and respondents felt designation would help ensure that this continues.
- 5.1.19 One local authority did not think there would be any negative impact from the designation on their area, although they said that this could not be confirmed until the management measures are confirmed. Another commented that they support the designation at present but any additional restrictions on mobile gear should be considered alongside other proposals for the Clyde as, cumulatively, they could have negative economic impacts on the area.
- 5.1.20 One environment/conservation respondent was concerned that analysis and assessment of socioeconomic impacts needed to be carried out in a more holistic way. They identified some gaps such as a lack of analysis of socioeconomic costs and economic impact which they felt would be harmful in the event of a pMPA not being designated.

Summary - Clyde Sea Sill

There was support for the designation of this MPA and for the protected features; there were requests to include the kelp forest and other seabird species.

Several respondents pointed out that data used for species counts are 15 years out of date and wanted to see this addressed.

The management options were welcomed.

Respondents, across various organisational groups, felt that designation would be beneficial to the area in terms of both the economy and well-being.

5.2 EAST CAITHNESS CLIFFS

5.2.1 The protected feature which the East Caithness Cliffs pMPA will conserve is:

- Biodiversity: Black guillemot

5.2.2 Respondents were asked for comments on the case for designation, management options and socioeconomic assessment for the East Caithness Cliffs pMPA and 22 respondents commented; six individuals and 16 organisations mainly from the public sector and environment/conservation groups.

5.2.3 Again, many individuals (48) submitted a campaign plus response, as described in Chapter 1, calling for the protection of black guillemots and for other seabirds to be protected in this area. The table below shows the total numbers commenting on this pMPA.

Table 5.4
Number commenting on the East Caithness Cliffs pMPA

	Number commenting
I support the MPAs proposed for black guillemot, and believe all other seabird species should have similar protection. The Scottish Government must take action now and designate MPAs for seabird feeding areas to help stop these declines before our cliffs fall silent [and variations]. (seabird campaigns)	1,626
Campaign plus responses	48
Standard responses	22
Total	1,696

Designation

5.2.4 The environmental/ conservation organisations commented on the importance of the area for seabirds such as razorbill, black-legged kittiwake, northern fulmar and common guillemot. Mobile fishing respondents, however, commented that black guillemot is not on the OSPAR list of threatened species.

5.2.5 Again, there were calls from individual and environmental/ conservation respondents for the kelp forests in the area to receive protection. Some felt that this pMPA should be considered in the draft seaweed consultation.

5.2.6 An energy respondent said that it is not clear what the effects of the designation would be on a wind farm proposed for the area.

5.2.7 Again, several respondents pointed out that data used for species count is 10 or 15 years out of date and wanted to see this addressed.

Management options

- 5.2.8 There was support for the management option to remove or avoid set nets and comments on the need to monitor this, from various respondent groups. Environment/conservation organisations wanted to see the EU's Action Plan for reducing incidental catches of seabirds in fishing gears if any fishing practices that cause seabird bycatch or mortality started in the area. These respondents commented that monitoring would be important.
- 5.2.9 There was also some comment that both set nets, scallop dredging and benthic trawling should be banned from the area. One local authority felt the management options may need to be reviewed if fishing areas are reviewed or if there are developments in finfish aquaculture such as cage top-nets. A static fishing respondent wanted to ensure that creel fishers would not lose any fishing opportunities in the MPA.
- 5.2.10 There was welcome for the alignment of this pMPA with the existing SPA in the same area.
- 5.2.11 Respondents also welcomed the management option measure to reduce or avoid the spread of mammalian predators and support for the development of biosecurity plans in relation to breeding habitat next to the area.
- 5.2.12 An energy organisation wanted the opportunity to discuss a transmissions project that may overlap with the area. One public sector respondent offered details of existing cables in the area; this respondent offered information on assets such as cables and pipelines across the pMPA areas.
- 5.2.13 A small number of individuals asked that the RSPB be involved in the management of the site.

Socioeconomic

- 5.2.14 A small number of individuals said that ecosystems are more important than any socioeconomic considerations as once they are gone they cannot be recovered.
- 5.2.15 Some of the environment/conservation respondents commented that "Costs have been identified in the BRIA which relate to port and harbour activities. However, management of these activities have not been proposed in the management options paper. The link between these is spurious and must be clarified if the estimates are to be used in ministerial decision making."
- 5.2.16 In relation to the Strategic Environmental Assessment, the need for at-sea feeding areas to be protected was mentioned by one environment/conservation respondent.
- 5.2.17 One local authority felt that deep mud habitats have only been under pressure since nephrops fishing started in inshore waters. They said that nephrops can be caught by creel fishing and added "Subject to measures to manage gear selectivity and fishing effort it is envisaged that such a fishery could present real economic benefit to local communities and the removal of gear conflicts between static and mobile gear could present advantages for Scotland's seas."

5.2.18 A respondent from the static fishing group also felt good management and a reduction in mobile gear would bring socioeconomic benefits.

Summary - East Caithness Cliffs

There was support for designation and for protected features in this pMPA and requests to include the kelp forest and other seabird species.

Some felt that this pMPA should be considered in the draft seaweed consultation

Several respondents pointed out that data used for species counts are 15 years out of date and wanted to see this addressed.

The management options were welcomed and there was welcome for the alignment of this pMPA with the existing SPA in the same area.

5.3 EAST OF GANNET AND MONTROSE FIELDS

- 5.3.1 The protected features that the East of Gannet and Montrose Fields pMPA will **conserve** are:
- Biodiversity: Ocean quahog aggregations (including sands and gravels as their supporting habitat) and offshore deep sea muds
- 5.3.2 There were comments in 15 responses on this pMPA; three from individuals and 12 from organisations, many of the organisations were from the environment/conservation group.

Designation

- 5.3.3 Most of those who replied simply said that they are supportive or noted the findings and proposals in respect of this pMPA. Respondents commented on its importance in respect of the ocean quahog and offshore deep sea mud and gravel communities and some, from the environment/conservation group, pointed out that “The southern part of the pMPA includes one of very few examples of deep sea mud on the continental shelf in the North Sea warranting this added protection.”
- 5.3.4 There were, however, comments from the public sector and energy groups that given the amount of oil and gas activity in the area this area does not represent a least damaged / most natural location.

Management options

- 5.3.5 There was support, from several respondent groups, for a large designated area prohibiting disturbance by bottom contact fishing gear and one environment/conservation respondent mentioned their support for the removal or avoidance of oil and gas activity while others commented on the ‘many concerns’ status, given within Scotland’s Marine Atlas, of shelf subtidal sediments in the area.
- 5.3.6 One public sector respondent, however, was concerned as the pMPA covers an area that is significantly important for oil and gas production with the potential for a significant increase in activity in the future. This respondent suggested a smaller or alternative area for the features identified. They also asked that the management options should say early contact with the ‘relevant’ regulator as this will not always be Marine Scotland and that ‘through the existing licensing process’ should be changed to ‘through the existing regulatory processes’. This comment was made in relation to many of the management options.
- 5.3.7 An energy respondent commented on the issue of oil and gas in the area and said: “The most likely management measure – minimising or avoiding the introduction of materials that alter the habitat type - might not be possible to comply with if maintenance is required on these pipelines.”
- 5.3.8 An energy respondent commented that the proposed route of a high voltage link between Norway and Britain will pass through the south-east of the pMPA. They said “however the footprint of the cable is very small in

comparison to the overall size of the proposed MPA. We therefore consider any impact on the proposed MPA as minor, and continue to liaise with Marine Scotland and the JNCC on the proposals.”

- 5.3.9 A public sector respondent offered details of existing assets, such as pipelines, in the area.

Socioeconomic

- 5.3.10 One environment/conservation respondent noted that the Business and Regulatory Impact Assessment (BRIA) indicates a moderate recovery for fish stocks; this was welcomed but, the respondent felt, would depend on the management options being applied. Others from this group commented that as the value of fish landed from this area is not substantial, it would represent a minimal impact to prohibit towed/active fishing gear in this area.
- 5.3.11 A public sector respondent said that the relevant Oil and Gas bodies do not feature in the consultation section of the BRIA and commented on technical issues around oil base mud cuttings mentioned in the BRIA. They also asked to be included in the development of any future management measures.
- 5.3.12 With regards the Strategic Environmental Assessment, one environment/conservation respondent wanted to see consideration given to the wider ecosystem in order to benefit other species such as fulmar and gannets which have been observed within the site.

Summary - East of Gannet and Montrose Fields

There was support for designation and for the management options. The importance of the ocean quahog and offshore deep sea mud and gravel communities was specifically noted. There were, however, concerns with regards to the economic importance of this area, especially with regards to Oil and Gas interests.

5.4 FAROE-SHETLAND SPONGE BELT

5.4.1 The protected features that the Faroe-Shetland Sponge Belt pMPA will **conserve** are:

- Biodiversity: Deep sea sponge aggregations, ocean quahog aggregations, offshore subtidal sands and gravels, and continental slope
- Geodiversity: Quaternary of Scotland - continental slope channels, iceberg ploughmark fields, prograding wedges, Submarine Mass Movement – slide deposits, Marine Geomorphology of the Scottish Deep Ocean Seabed – sand wave field, sediment wave field

5.4.2 Twenty-one respondents commented on the Faroe-Shetland Sponge Belt; this included four individuals and 17 organisations, mainly from the environment/conservation and international fisheries groups.

Designation

5.4.3 The individual respondents and some organisations simply welcomed the designation or commented on the features, importance or uniqueness of the area.

5.4.4 A local authority pointed out that many of the features also exist in the North-east Faroe Shetland Channel pMPA and suggested reducing the size of either that pMPA or the Faroe-Shetland Sponge Belt pMPA.

5.4.5 A public sector respondent commented that this area overlaps with oil and gas activity and there will be additional activity in the future and felt consideration should be given to the size and location of the Faroe-Shetland Sponge Belt pMPA.

Management Options

5.4.6 The size of the pMPA also featured in responses about the management options. A local authority felt that those who fish the area may find the remove/avoid option more acceptable if the size of the area was reduced; they also commented on the need for further discussion with the fishing sector.

5.4.7 Four of the French fisheries respondents submitted the same response asking for a minor modification in the area that, they felt, would still allow them to fish in the area. They submitted a map of the area showing the modification requested. A Spanish fisheries respondent commented that Spain also has fishing interests in part of the area.

5.4.8 Environment/conservation respondents supported the removal of bottom contact mobile and static gear from the area. This group of respondents also wanted the management plan to include consideration of potential benefits to seabirds and the wider marine environment; white-sided dolphin, sperm whale, long-finned pilot whale and fin whale were also mentioned. These respondents also commented that monitoring will be important.

5.4.9 One environment/conservation respondent said they supported the removal or avoidance of pressures associated with oil and gas activities and a case-by-case consideration of these activities. This respondent did not feel the remove/avoid pressure in relation to oil and gas activities could be achieved given the current and proposed level of activity in the area. They also felt some management measures may be unfeasible or not economically viable and gave micro-siting as an example. This respondent questioned the size of the area, as did an energy respondent who also said that it may not be feasible to comply with proposed management measures such as micro-siting and minimising or avoiding the introduction of materials.

Socioeconomic

5.4.10 Environment/conservation groups saw the benefits of conserving the deep sea biodiversity in the area as outweighing that of trawling in the area.

5.4.11 Several from this group voiced concern about “inappropriate assumptions made in the socioeconomic assessment when calculating the costs of designation”.

5.4.12 The French fisheries respondents provided details of their catch throughout the year along with its value. A Spanish fisheries respondent said that closing the area to trawlers would “entail financial loss for Spanish vessels active in this area.”

5.4.13 In relation to the oil and gas activity in the area, a public sector respondent commented on the potential impact on current and future activity and said that they did not agree with the assumptions for oil and gas cost impacts “especially the intermediate estimate which appears to be virtually identical to the lower estimate”.

5.4.14 An energy respondent said that the BRIA failed to recognise the costs involved in changing proposals such as finding alternative routes.

Summary - Faroe-Shetland Sponge Belt

There was support for designation and for the management options although a number of respondents would support a smaller area.

There were differences in opinion between sectors (particularly environment and fishing) over restrictions on fishing in the area.

5.5 FETLAR TO HAROLDSWICK

5.5.1 The protected features that the Fetlar to Haroldswick pMPA will **conserve** are:

- Biodiversity: Black guillemot, circalittoral sand and coarse sediment communities, horse mussel beds, kelp and seaweed communities on sublittoral sediments, maerl beds, and shallow tide-swept coarse sands with burrowing bivalves
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed

5.5.2 Respondents were asked for comments on the case for designation, management options and socioeconomic assessment for the Fetlar to Haroldswick pMPA and 23 respondents commented; seven individuals and 16 organisations, mainly from the public sector and environment/conservation groups. Again, many individuals (48) submitted campaign plus text, as described in Chapter 1, calling for the protection of black guillemots and for other seabirds to be protected in this area. The table below shows the total numbers commenting on this pMPA.

Table 5.5
Number commenting on the Fetlar to Haroldswick pMPA

	Number commenting
I support the MPAs proposed for black guillemot, and believe all other seabird species should have similar protection. The Scottish Government must take action now and designate MPAs for seabird feeding areas to help stop these declines before our cliffs fall silent [and variations]. (seabird campaigns)	1,626
Campaign plus responses	48
Standard responses	23
Total	1,697

Designation

5.5.3 Most respondents who commented simply voiced their support for the designation or highlighted the reasons for their support; this included the maerl beds and the high percentage of the British population of black guillemots found in this site. A respondent from the ‘other’ organisations group felt that there could also be wider benefits to Atlantic salmon and sea trout.

5.5.4 Several of the environment/conservation respondents commented that as the management options paper says ‘any impacts to the horse mussel beds, maerl beds, and kelp and seaweed communities on sublittoral sediment will have already occurred’, the objective for these features should be to recover rather than conserve.

5.5.5 An aquaculture respondent said that there have been shellfish sites in the location for many years and these “have been developed in a sustainable and considerate manner, which has contributed greatly to safeguarding and maintaining the biodiversity of the adjacent seas, upon which the sector

depends for its economic wellbeing and future prosperity”. This respondent wanted to see the sites continue, while ensuring the protected features are acknowledged.

Management options

- 5.5.6 Several respondents welcomed the management options suggested for this pMPA.
- 5.5.7 There was welcome for the inclusion of the Shetland Islands’ Marine Spatial Plan and for the recognition of management measures already in place via the Shetland Shellfish Management Organisation. The academic/ scientific respondent making these comments also reported that work they had undertaken had filled a gap in information, in relation to towed fisheries identified in the management options paper and they confirmed “that there are no towed fisheries in the Bluemull Sound area of the proposed MPA”.
- 5.5.8 There were calls, from aquaculture and the environment/conservation group to ensure those involved in fishing the area are consulted over the plans for reducing or limiting pressures from any fishing activity.
- 5.5.9 A recreation/ tourism respondent felt there would need to be monitoring of anchorage levels to ensure this does not cause damage, while an industry/ transport respondent requested information on the sensitivity of horse mussel beds to the Basta Voe anchorage.
- 5.5.10 Again, an environment/conservation respondent wanted to see consideration of seabird and the wider marine environment in the management plan. There were calls from several of the environment/conservation respondents to extend dredging restrictions across the area, extending anti-predator methods to a 5km radius from nest sites and relocating any farms causing damage.
- 5.5.11 These environment/conservation respondents also commented that in the absence of detailed information on the impacts of aquaculture, a precautionary approach should be taken, however a public sector respondent welcomed the risk-based approach. The public sector respondent asked for more information on whether assets such as pipelines had been considered under ‘Activities considered not capable of affecting the protected features’. A respondent from the recreation/ tourism group asked if recreational diving was to be restricted.

Socioeconomic

- 5.5.12 There was concern, from the aquaculture group, over potential impacts on the shellfish business, with consequent impacts for employment and other factors in the area; more information is needed on this issue. A local authority also wanted to see the methodology used to arrive at the conclusion that any impacts from management options will be low.
- 5.5.13 Environment/conservation respondents commented that the designation will allow seabird and wildlife tourism to continue to bring socioeconomic benefits to the area.

Summary - Fetlar to Haroldswick

There was support for designation and for protected features in this pMPA and requests to include other seabird species. There were calls for the objective for horse mussel beds, maerl beds, and kelp and seaweed communities to be recover rather than conserve.

The management options attracted broad support and there was welcome for the inclusion and recognition of existing measures.

Respondents wanted to ensure that those involved in fishing the area are consulted over the plans for reducing or limiting pressures from any fishing activity.

While there were some calls to extend dredging restrictions across the area, extend anti-predator methods to a 5km radius from nest sites and relocate any farms causing damage, there were also concerns over potential impacts on the shellfish business, with consequent impacts for employment and other factors in the area.

5.6 HATTON-ROCKALL BASIN

5.6.1 The protected features that the Hatton-Rockall Basin pMPA will **conserve** are:

- Biodiversity: Deep sea sponge aggregations and offshore deep sea muds
- Geodiversity: Marine Geomorphology of the Scottish Deep Ocean Seabed – sediment drifts, Polygonal fault systems

5.6.2 Eight respondents (two individuals, four environment/conservation respondents and a respondent from tourism/ recreation) commented on the Hatton-Rockall Basin pMPA.

Designation

5.6.3 Several of those who commented simply supported the designation or commented on the importance of the area. Some of the environmental/conservation respondents said that while there is good evidence of the presence of features, information is lacking on their distribution.

5.6.4 There were also calls for surveys to identify the full extent of deep sea sponge aggregations.

Management Options

5.6.5 The management options were supported by the environment/conservation respondents who also wanted to see monitoring of fishing activity and research on the type and extent of fishing activity in the area.

5.6.6 One respondent from this group asked that pilot whale and northern bottlenose whale be included in considerations. This group also commented on the need to rely on the North East Atlantic Fisheries Commission (NEAFC) as the area is outwith UK fishery limits for enforcement; they commented that “the reliability of this process remains to be tested.” Another of the environment/conservation respondents set out a list of regulation and management elements that they would like to see applied to deep-sea fishing in this pMPA.

Socioeconomic

5.6.7 Environment/conservation respondents commented that the relatively low cost of management options would be outweighed by ecological benefits.

Summary - Hatton-Rockall Basin

A small number commented and supported the designation and management options.

5.7 LOCH CRERAN

5.7.1 The protected features that the Loch Creran pMPA will **conserve** are:

- Biodiversity: Flame shell beds
- Geodiversity: Quaternary of Scotland

5.7.2 Comments on Loch Creran were noted in 19 responses; two individuals and 17 organisations across most groups.

Designation

5.7.3 Most respondents voiced support for the designation.

5.7.4 Several of the environment/conservation respondents commented: “This possible MPA (overlying the existing SAC for biogenic reefs) will be important to protect and enhance serpulid worm aggregations, flame shell beds and horse mussel beds. The area has already been declared a SAC and management will need to refer to, and align with, the objectives of the SAC. The congruence of the boundaries will simplify this.” This group would prefer the objective of recover rather than conserve for the flame shell beds.

Management Options

5.7.5 The management options were supported by the environment/conservation respondents; these respondents wanted to see more protection with regards to pollution from finfish farms across the area rather than limited to the areas where aquaculture takes place.

5.7.6 A local authority, who also supported the options, was surprised that no additional management was suggested for moorings, while a tourism/recreation respondent suggested a diver survey of the extent of the flame shell beds in case of any extension of the moorings at Creagan. Respondents from the recreation/ tourism group also suggested a diver code of conduct and monitoring of fishing and recreational anchoring.

5.7.7 One respondent from the industry/ transport group commented on the need to occasionally replace moorings for vessels serving a quarry; there are no roads to the site; when this occurs a diver survey is conducted and application for a new mooring is made. Another from this group noted that commercial shipping and anchorages are not anticipated to have an impact on the protected features in this pMPA.

5.7.8 A static fishing respondent was keen that no fishing opportunities for creel fishers would be lost in this area.

Socioeconomic

5.7.9 The area was described as hugely important for marine tourism and it was noted that management options are not expected to impact on existing activities.

5.7.10 One respondent from the industry/ transport group stressed the need for the importance of the loch for commercial shipping associated with the quarry to be recognised.

Summary - Loch Creran

There was broad support for the designation and management options.

Some would prefer the objective of recover rather than conserve for the flame shell beds.

5.8 LOCH SUNART

5.8.1 The protected features that the Loch Sunart pMPA will **conserve** are:

- Biodiversity: Flame shell beds, northern feather star aggregations on mixed substrata and serpulid aggregations

5.8.2 Twenty-four respondents commented on the Loch Sunart pMPA and this included five individuals and 19 organisations across groups.

Designation

5.8.3 The designation was supported by many who commented, although environment/conservation respondents and one from recreation/ tourism would prefer the objective for the features, and especially the serpulid aggregations, to be recover rather than conserve. There were comments on the importance of the area; as one individual commented: “This is a unique opportunity to preserve the potential building of a reef in its early stages”.

Management Options

5.8.4 Mobile fishing respondents also supported the designation; one commented that they support the principle if fishing measures and aquaculture sites are not affected. Environment/conservation respondents supported the management options to remove or avoid pressures from fishing and farms in the area for serpulid reefs and flame shell beds and said that: “Existing aquaculture ventures will need to ensure they are compliant with updated or revised Environmental Management Systems to ensure operations minimise local and diffuse cumulative impacts, particularly with respect to water quality, erosion, sedimentation and disease”.

5.8.5 However, a local authority felt that the management measures to restrict commercial fishing activities away from the features would be “virtually impossible to implement, or enforce.” This respondent, along with an individual, felt that all mobile gear should be excluded. They also suggested ‘go’ (as opposed to ‘no go’) areas where a limited number of local static fishing vessels would be allowed to fish.

5.8.6 An industry/ transport respondent asked for information on the interaction between the Loch Teacuis anchorage and the serpulid aggregations in order to assess any impacts from management measures. A public sector respondent commented that any restrictions on anchorage within Loch Teacuis would mainly affect the local community, given the low number of craft that enter.

5.8.7 Mobile fishing respondents stressed the need to involve local communities and all other stakeholders in the management of the pMPA. A static fishing respondent was keen that no fishing opportunities for creel fishers would be lost in this area.

Socioeconomic

5.8.8 Again, a relatively small cost associated with designation was seen as being outweighed by potential ecological benefits by environment/conservation respondents. There were calls for harbour porpoise to be considered in the

management options and also common eider, common tern, common gull and black guillemot.

- 5.8.9 A local authority queried the focus of the socioeconomic assessment and related timescales: “For example does the assessment consider the potential longer term economic benefits accruing from the short term loss in fisheries income. It might reasonably be speculated that exclusion of fishing activities from a particular area now may result in long term benefits in terms of the site becoming a nursery area from which mature fish can enter the fishery in the longer term, potentially providing greater benefits for future generations?”
- 5.8.10 A respondent from the mobile fishing group said it is important to consider all aspects of the socioeconomic assessment before designation.
- 5.8.11 A respondent from the mobile fishing group suggested that an area at the entrance to the loch should “be considered as a “scallop nursery” protected zone”.

Summary - Loch Sunart

There was broad support for the designation and management options.

Some would prefer the objective for the features, and especially the serpulid aggregations, to be recover rather than conserve.

There were differences in opinion between sectors over restrictions on fishing in the area.

Some commented on the need to involve local communities and all other stakeholders in the management of the pMPA.

5.9 LOCH SUNART TO THE SOUND OF JURA

5.9.1 The protected features that the Loch Sunart to the Sound of Jura pMPA will **conserve** are:

- Biodiversity: Common skate
- Geodiversity: Quaternary of Scotland

5.9.2 There were comments in twenty-nine responses on the Loch Sunart to the Sound of Jura pMPA. Five individuals and 24 organisations, across groups, commented.

Designation

5.9.3 There was broad support for this designation but also several suggestions for changes including:

- Extending the area by 5km to the south west in the Sound of Jura to include the razorbill foraging area
- Extending to the common seal SAC in southeast Islay and the north end of Lismore
- Adding black-legged kittiwake, common guillemot and razorbill as protected features

5.9.4 A local authority suggested that one MPA should cover the area rather than the two suggested (in relation to Loch Sunart pMPA).

5.9.5 One industry/ transport respondent asked that Tobermory Bay and the near approaches be excluded in line with other harbours such as Oban as there is no historic evidence of common skate in this area. They commented: "Managing the Port within an MPA would put a considerable burden on our community Management and Governance of the Port, especially as we have new and long- term infrastructure proposals for the Port which will bring benefits to other more remote communities up and down the west coast."

5.9.6 Another transport/ industry respondent commented on the importance of being able to anchor and moor in Loch Linnhe and asked that the importance of the Sound of Mull and Firth of Lorn as shipping routes be recognised. They also proposed an alternative boundary that does not bisect the Glensanda Harbour limits.

5.9.7 There were calls, from the environment/conservation group, to find another site in addition to this in order to further protect the common skate.

5.9.8 A local authority and respondents from the mobile fishing group commented on a lack of data in relation to the common skate, particularly the distribution of juvenile skate and nursery areas. The mobile fishing respondents commented that the site proposed is too large; one said that once more data is available it would be preferable to designate smaller areas. The site was described as "an important, safe, commercial fishing area and within sections of the proposal, used by all the main finfish farms".

5.9.9 There was a comment on the need to include harbour porpoise as the site overlaps with areas critical to them.

Management Options

5.9.10 Most respondents supported the management options for this site.

5.9.11 There were calls for the management plan to consider potential benefits to seabirds and the wider marine environment.

5.9.12 Respondents wanted to see further research on common skate nursery grounds to support decisions about the area. There were also requests for more research on the impact of aquaculture, mooring and anchoring on common skate eggs and on the interaction between towed/active fishing gear and the common skate.

5.9.13 The environment/conservation respondents supported the reduction or limitation of mobile gear in the area and the removal or avoidance of bottom set nets and long-lines. They commented on the need for full engagement with the fishing industry and other stakeholders.

5.9.14 However, there were also comments that current regulations mean common skate are not targeted and if landed as bycatch are returned to the sea alive. Rather than further limiting the use of mobile gear it may be better to focus on other ways of further reducing fishing-related mortality. A local authority “would wish to see measures relating to better handling of by-caught skate and gear modification considered prior to determination of whether spatial measures are required.”

5.9.15 A static fishing respondent did not want to see any limitations for mobile or static fishing without further scientific evidence while a local authority suggested keeping the site as a search location until additional research has been conducted. A respondent from the mobile fishing group commented that such a large area could have adverse effects on the mobile fishing industry.

5.9.16 There was a comment that if the wind development off Tiree goes ahead the cables will go through this area.

Socioeconomic

5.9.17 A small number commented on the economic contribution from sea angling in the area.

5.9.18 A local authority felt that the implementation of additional measures might have a greater economic impact than the recommended measures, for example measures to protect egg laying areas.

5.9.19 While an environment/conservation respondent said that management measures seem to protect the status quo rather than regenerating biodiversity, a mobile fishing respondent commented on the need for a socioeconomic assessment before designation and pointed out that this is an “important safe fishing area in winter months in particular”, an area that supports local communities that rely on fishing.

Summary - Loch Sunart to the Sound of Jura

There was broad support for this designation but also several suggestions for changes including extending the area, reducing the area and adding various seabird species to the protected features.

While there was broad support for the management options, again there were some differences in opinion between sectors over restrictions on fishing in the area.

There were comments on a lack of data, especially in relation to the common skate.

5.10 LOCH SWEEN

5.10.1 The protected features that the Loch Sween pMPA will **conserve** are:

- Biodiversity: Burrowed mud, maerl beds, native oysters, and sublittoral mud and mixed sediment communities

5.10.2 Twenty respondents commented and this included 16 organisations across groups and four individuals.

Designation

5.10.3 Respondents supported the designation with environment/conservation respondents suggesting that the maerl beds may be more extensive. Some of these respondents felt that the objectives for the maerl beds and native oyster should be recover rather than conserve as it is probable that fishing has impacted on these features. There was a comment that the habitats and species in the topography around the Macormaig Isles are not well described.

Management Options

5.10.4 Respondents commented on the need for a more realistic assessment of fishing levels in the area and clarity over the likely levels of restriction on mobile and static fishing gear. There were also comments that recreational anchorages should be reviewed to ensure these are not in the vicinity of maerl beds. A public body commented that the anchorage at Ashfield is recreational rather than commercial; restriction on anchorage should be limited as otherwise this may affect the number of visitors to the area.

5.10.5 Again, a static fishing respondent was keen that no fishing opportunities for creel fishers would be lost in this area.

Socioeconomic

5.10.6 There was a feeling that designating this site would contribute to the local economy through additional tourism.

Summary - Loch Sween

There was broad support for this designation and management options. Some respondents felt the objectives for the maerl beds and native oyster should be recover rather than conserve.

There were calls for a more realistic assessment of fishing levels in the area and clarity over the likely levels of fishing restrictions. Some asked for recreational anchorages to be reviewed to ensure these are not in the vicinity of maerl beds.

5.11 LOCHS DUICH, LONG AND ALSH

5.11.1 The protected features that the Lochs Duich, Long and Alsh pMPA will **conserve** are:

- Biodiversity: Burrowed mud and flame shell beds

5.11.2 Twenty-two respondents, including four individuals and 18 organisations across groups, commented on the Lochs Duich, Long and Alsh pMPA.

Designation

5.11.3 Respondents mainly supported the designation and commented on the importance of this area. Some environment/conservation respondents wanted to see the objective for burrowed mud set to recover rather than conserve. There were calls to add fan mussels to the list of protected features, again set to recover and one call for all features to be set to recover rather than conserve. A local group wanted to see Kyle Rhea included in the area.

5.11.4 Environment/conservation respondents also commented that this pMPA overlaps with an existing SAC and said “management will need to refer to, and align with, the objectives of this SAC”.

Management Options

5.11.5 Management options were agreed by respondents. A static fishing respondent wanted to ensure that no opportunities for creel fishers would be lost. A local authority respondent suggested that management would be more efficient if mobile fishing gear is excluded from the whole MPA and made a similar comment about diver collected horse mussels.

5.11.6 Environment/conservation respondents commented: “Existing aquaculture ventures will need to ensure they are compliant with updated or revised Environmental Management Systems to ensure operations minimise local, and diffuse cumulative, impacts, particularly with respect to water quality, erosion, sedimentation and disease.”

Socioeconomic

5.11.7 Respondents from the environment/conservation group felt displacement costs would be outweighed by ecological benefits.

5.11.8 One local authority felt that deep mud habitats have only been under pressure since nephrops fishing started in inshore waters. They said that nephrops can be caught by creel fishing and said this could present real economic benefit to local communities.

Summary - Loch Duich, Long and Alsh

There was broad support for this designation. Some respondents wanted to see the objective for burrowed mud set to recover rather than conserve. There were some calls to add fan mussels to the list of protected features; again set to recover.

There was also broad support for the management options.

5.12 MONACH ISLES

5.12.1 The protected features that the Monach Isles pMPA will **conserve** are:

- Biodiversity: Black guillemot
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed, and Quaternary of Scotland

5.12.2 Nineteen respondents commented on the Monach Isles pMPA (three individuals and 16 organisations across most of the groups). Again, many individuals (48) submitted a campaign plus response, as described in Chapter 1, calling for the protection of black guillemots and for other seabirds to be protected in this area.

5.12.3 The table below shows the total numbers commenting on this pMPA.

Table 5.6
Number commenting on the Monach Isles pMPA

	Number commenting
I support the MPAs proposed for black guillemot, and believe all other seabird species should have similar protection. The Scottish Government must take action now and designate MPAs for seabird feeding areas to help stop these declines before our cliffs fall silent [and variations]. (seabird campaigns)	1,626
Campaign plus responses	48
Standard responses	19
Total	1,693

Designation

5.12.4 The designation was supported by respondents; there were calls to include the kelp forests as a protected feature and for the MPA to be considered in the draft seaweed policy consultation. Respondents commented that the designation would also benefit a range of other seabird species.

Management Options

5.12.5 The management options were also supported; there was a call to ensure access for swimmers and divers and that creel fishers should not lose any opportunities through the designation.

Socioeconomic

5.12.6 Commenting on the BRIA, environment/conservation respondents said that it contains costs relating to port and harbour activities but that these have not been included in the management options.

5.12.7 A local authority asked that distinction be made between surface set nets and bottom set nets. Local accountability and control was seen as critically important as was consultation with local stakeholders on feature sensitivities and management proposals.

5.12.8 Mobile fishing respondents said the reference to set nets as a risk should say surface set nets as bottom set nets do not pose a threat to the guillemots.

5.12.9 There were a number of comments on the need to manage tangle net fishery if current prohibitions are lifted.

Summary - Monach Isles

There was support for designation and for protected features in this pMPA and requests to include other seabird species and for kelp forests to be protected. Some felt that this pMPA should be considered in the draft seaweed consultation

The management options were broadly supported.

5.13 MOUSA TO BODDAM

5.13.1 The protected features that the Mousa to Boddam pMPA will **conserve** are:

- Biodiversity: Sandeels.
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed

5.13.2 Nineteen respondents commented on the Mousa to Boddam pMPA (five individuals and 14 organisations across most organisation groups).

Designation

5.13.3 Respondents agreed with the designation of this site although there were some suggestions that the boundary should change to include possible sandeel habitat beyond the proposed area. There were calls to change the objective for sandeels from conserve to recover and for kelp forests to be protected.

Management Options

5.13.4 Respondents from the environment/conservation group asked that research be carried out into the impact of demersal dredge on sandeels.

5.13.5 There was a query from a public sector organisation as to whether assets such as pipelines and activities associated with the engagement of those assets have been considered.

5.13.6 While a recreation/ tourism respondent said there would be a need to monitor static fishing gear, a static fishing respondent was keen that no fishing opportunities for creel fishers would be lost in this area.

Socioeconomic

5.13.7 The importance of seabird tourism to the area was noted; the birds are reliant on fish stocks, which are in turn affected by any decrease in sandeel spawning stock biomass. Environment/conservation respondents commented that this “should be considered as part of the environmental baseline and a switch away from cannibalism should be considered as a benefit of designating this site”.

Summary - Mousa to Boddam

The designation was agreed although there were some suggestions that the boundary should change to include possible sandeel habitat beyond the proposed area.

Some called for the objective for sandeels to be set as recover rather than conserve and for kelp forests to be protected.

There were also calls for research into the impact of demersal dredge on sandeels.

5.14 NORTH-EAST FAROE SHETLAND CHANNEL

5.14.1 The protected features that the North-east Faroe Shetland Channel pMPA will **conserve** are:

- Biodiversity: Deep sea sponge aggregations, offshore deep sea muds, offshore subtidal sands and gravels, and continental slope
- Geodiversity: Quaternary of Scotland -prograding wedge; Submarine Mass Movement - slide deposits; Marine Geomorphology of the Scottish Deep Ocean Seabed - contourite sand/silt; Cenozoic Structures of the Atlantic Margin - mud diapirs

5.14.2 Eighteen respondents (three individuals and 15 organisations from many of the groups) commented on the North-east Faroe Shetland Channel pMPA.

Designation

5.14.3 Most respondents supported the designation.

5.14.4 Respondents from the international fisheries group acknowledged the importance of protecting the deep sea sponge habitat but, commenting on the importance of the area to the French fleet, proposed different boundaries which would still offer the conservation objective.

5.14.5 A local authority, energy respondent and public body commented on the size of the site and suggested that the area could be smaller.

Management Options

5.14.6 There was acknowledgement that the area is important to the fishing industry and respondents said that monitoring and compliance of fishing activity as well as engagement with the industry will be necessary.

5.14.7 Environment/conservation respondents were concerned that there are no management options to protect the continental slope in the pMPA from damaging activities. This group also said that oil and gas exploration should not be allowed in areas that overlap “the very limited extent of deep sea sponge aggregations, or where they are sufficiently in the vicinity of those aggregations to risk their conservation status from down or up-current events”.

5.14.8 Respondents from the international fisheries group proposed a new shape for the MPA “allowing the conservation objective for the habitats and a better alternative for the French fleet”.

Socioeconomic

5.14.9 There was some concern, from environment/conservation respondents, that inappropriate assumptions had been made in calculating the cost of designation, with comments that the benefits of conserving deep sea biodiversity outweigh the benefits of trawling. There were also comments that this pMPA is a critical habitat for white-sided dolphin, sperm whale, long-finned pilot whale and fin whale and that these should be included when looking at management options.

5.14.10 The international fisheries respondents submitted the annual value of their landings of mainly hake and saithe and commented that activity in this pMPA takes place all year round.

Summary - North-east Faroe Shetland Channel

Most respondents supported the designation but there was acknowledgement of the importance of the area to the fishing industry with respondents asking for monitoring and compliance of fishing activity as well as engagement with the industry.

There was some concern that there are no management options to protect the continental slope.

5.15 NORTH-WEST ORKNEY

5.15.1 The protected features that the North-west Orkney pMPA will **conserve** are:

- Biodiversity: Sandeels
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed – sand bank, sand wave field, and sediment wave fields

5.15.2 Eighteen respondents commented on the North-west Orkney pMPA; (four individuals and 14 organisations, including many from the environment/conservation group).

Designation

5.15.3 Respondents from the environment/conservation group supported the designation although some called for the objective for sandeels to be set to recover rather than conserve. Respondents noted that there has been no strategic monitoring of the sandeel population but using seabird health as a proxy it would seem that the sandeels in the area are in poor condition and undersized.

5.15.4 The importance of the spawning stock in the area was noted as was the contribution to the economy from seabird tourism in this area and the need to consider the seabird population.

5.15.5 A recreation/ tourism respondent felt that the designation did not fit with government targets for doubling farmed salmon production: “It is patently obvious to us that the requirement of at least 3 tonnes of wild oily fish (sandeels) caught to produce one tonne of farmed salmon is the very definition of unsustainable practise - without even touching on the sea lice issue”.

Management Options

5.15.6 An energy respondent wanted to discuss this pMPA as it overlaps with a transmissions project.

5.15.7 There was particular support for the proposal to limit any future sandeel fishery in the area.

5.15.8 Environment/conservation respondents felt that the suggestion for no additional management is contradictory to the ambition set out for the MPA and “fails to meet the duty in the Marine Act to protect and where appropriate enhance the health of the marine environment.”

5.15.9 A local authority respondent said they would be concerned if the pMPA significantly affected potential development of offshore renewables in the area.

Socioeconomic

5.15.10 The value of tourism from seabirds and wildlife was noted; respondents felt that the future of this industry depended on good management of the environment.

5.15.11 A respondent from the mobile fishing group pointed out that sandeels are protected elsewhere and that they do not appear on the OSPAR list of threatened or declining species; this respondent therefore questioned the legality of designating on this basis and expressed concern over any attempt to limit fishing in the area.

Summary - North-west Orkney

Most respondents supported the designation although some called for the objective for sandeels to be set to recover rather than conserve.

Most supported the proposal to limit any future sandeel fishery in the area.

5.16 NORTH-WEST SEA LOCHS AND THE SUMMER ISLES

5.16.1 The protected features that the North-west sea lochs and the Summer Isles pMPA will **recover** are:

- Biodiversity: Flame shell beds and maerl beds

5.16.2 The protected features that the North-west sea lochs and the Summer Isles pMPA will **conserve** are:

- Biodiversity: Burrowed mud, circalittoral muddy sand communities, kelp and seaweed communities on sublittoral sediments, maerl or coarse shell gravel with burrowing sea cucumbers, and northern feather star aggregations on mixed substrata
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed, Seabed Fluid and Gas Seep, Submarine Mass Movement, Quaternary of Scotland

5.16.3 Comments on the North-west sea lochs and the Summer Isles pMPA were noted in 47 responses; this included 19 individuals and 28 organisations across most groups.

Designation

5.16.4 Environment/conservation respondents supported the designation or called for it to be extended to cover “all maerl beds and other seabed habitats used as fish spawning grounds around Wester Ross”. In particular, most individuals wanted to see the area extended to include Loch Gairloch. Other respondents, including aquaculture, felt that the area is too large and suggested a reduction in size to focus on specific locations.

5.16.5 There were calls to add seagrass beds and sea trout to the protected features.

5.16.6 Some respondents suggested that the area should be the Wester Ross MPA to give a clear local identity, foster local interest and give a greater sense of local ownership.

5.16.7 Mobile fishing respondents voiced concern over the evidence given in support of the protected features.

Management Options

5.16.8 There was support from many respondents for the management options for this pMPA; however, a number of mobile fishing respondents voiced opposition or concerns.

5.16.9 An aquaculture respondent asked for more detail on developing finfish aquaculture in the area; they said: “as a small business which only operates in this proposed MPA, this has potentially significant effects on my business.” A mobile fishing respondent commented that too many areas are being closed to fisherman.

- 5.16.10 An energy respondent wanted to discuss this pMPA as it overlaps with a transmissions project.
- 5.16.11 Some individuals and one from the mobile fishing group called for the area to be managed by local fishermen. Respondents from this group also voiced concern over erosion of fishing rights. A static fishing respondent wanted to see robust management and added a caveat to their support for the pMPA that creel fishers should not lose any fishing opportunities.
- 5.16.12 A respondent from the other organisation group questioned whether the timeline set would be sufficient for the audit and review process.
- 5.16.13 Other respondents wanted to see research to investigate interactions between active/mobile gear and the protected features.
- 5.16.14 There were calls to consider porpoises within the management options.

Socioeconomic

- 5.16.15 An aquaculture respondent and several individuals felt that the costs of designation and displacement would potentially be much greater than detailed and that social costs had not been adequately accounted for.
- 5.16.16 Concern over potential loss of jobs was voiced by a small number of individuals and respondents from the mobile fishing group. These respondents pointed out that the area had been fished sustainably for at least 50 years using low horsepower vessels and light gear “and have avoided areas where the proposed features are located”. This group said: “Zoning of the areas currently fished by prawn trawlers and scallop dredgers should be identified to ensure that modern technology is used to avoid the designated features within the MPA”.
- 5.16.17 Environment/conservation respondents and also several other individuals felt that there would be economic benefits from continuing or increased tourism, diving and sea angling.
- 5.16.18 A local authority commented on costs to existing operations with the site and queried the figures presented for this pMPA: “The values quoted are an order of magnitude greater than those for other sites. This appears to be slightly incongruous and the Council would ask that the figures presented be reviewed.”

Summary - North-west sea lochs and the Summer Isles

While there was support for the designation there were also conflicting suggestions; some wanted to see the area extended while others felt it should be reduced.

There were calls to add seagrass beds and sea trout to the protected features.

Some suggested the area should be called Wester Ross to give a clear local identity, foster local interest and give a greater sense of local ownership.

There was support from most respondents for the management options

5.17 NOSS HEAD

5.17.1 The protected feature which the Noss Head pMPA will **conserve** is:

- Biodiversity: Horse mussel beds

5.17.2 There were comments on the Noss Head pMPA in 18 responses including 3 from individuals and 15 from organisations across various groups.

Designation

5.17.3 Many respondents simply said that they support the designation of the Noss Head pMPA.

Management Options

5.17.4 An energy respondent wanted to discuss this pMPA as it overlaps with a transmissions project.

5.17.5 Most of the others who commented voiced support for the management options for this site.

Socioeconomic

5.17.6 Several respondents from the environment/conservation group commented on the potential value to divers and anglers in terms of both economics and well-being.

Summary – Noss Head

There was broad support for the designation and the management options for this pMPA.

5.18 PAPA WESTRAY

5.18.1 The protected features that the Papa Westray pMPA will **conserve** are:

- Biodiversity: Black guillemot
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed

5.18.2 Nineteen respondents, five individuals and 14 organisations, commented on Papa Westray. In addition, many individuals (48) submitted a campaign plus response, as described in Chapter 1, calling for the protection of black guillemots and for other seabirds to be protected in this area. The table below shows the total numbers commenting on this pMPA.

Table 5.7
Number commenting on the Papa Westray pMPA

	Number commenting
I support the MPAs proposed for black guillemot, and believe all other seabird species should have similar protection. The Scottish Government must take action now and designate MPAs for seabird feeding areas to help stop these declines before our cliffs fall silent [and variations]. (seabird campaigns)	1,626
Campaign plus responses	48
Standard responses	19
Total	1,693

Designation

5.18.3 Respondents supported the designation of the Papa Westray site. There were calls for kelp habitats to be added to the list of protected features and a suggestion, from environment/conservation respondents “that this MPA is considered in the parallel draft seaweed policy statement consultation, and particularly with regards to guidance developed for the harvest of wild seaweed.”

5.18.4 Environment/conservation respondents pointed out that biosecurity on the islands would help safeguard seabirds breeding on Papa Westray including Arctic tern and Arctic skua.

Management Options

5.18.5 There was broad support for the management options. One local authority did voice concern that the pMPA may affect possible future development of offshore renewables in the area.

Socioeconomic

5.18.6 Respondents commented on the importance of the site for seabird and wildlife tourism and for anglers and divers; it was hoped that designation of the Papa Westray site would ensure this continues.

5.18.7 A local authority felt the socioeconomic assessment too high level to consider the impact on local communities and the local economy.

5.18.8 One mobile fishing respondents commented that the site overlaps Draft Plan Option TN3 for tidal and said that tidal arrays should be discouraged from this site to protect diving birds.

Summary - Papa Westray

There was support for designation and for protected features in this pMPA and requests to include the kelp forest and other seabird species.

Some felt that this pMPA should be considered in the draft seaweed consultation.

There was broad support for the management options.

5.19 ROSEMARY BANK SEAMOUNT

5.19.1 The protected features that the Rosemary Bank Seamount pMPA will **conserve** are:

- Biodiversity: Deep sea sponge aggregations, seamount communities and seamount features
- Geodiversity: Quaternary of Scotland- iceberg ploughmark field; Submarine Mass Movement - slide scars, Marine Geomorphology of the Scottish Deep Ocean Seabed - scour moats, sediment drifts, sediment wave fields, Cenozoic Structures of the Atlantic Margin - Rosemary Bank Seamount

5.19.2 Ten respondents, two individuals and eight organisations (mainly from the environment/conservation group) commented on the Rosemary Bank Seamount pMPA.

Designation

5.19.3 Most respondents who commented voiced support for the designation of this pMPA. There were calls for protection for whales and dolphins in this area.

Management Options

5.19.4 There was support for the management options on this pMPA although one recreation/ tourism respondent would rather see controls on aggressive fishing methods than a ban. A static fishing respondent was keen to ensure no loss of opportunity for creel fishers.

5.19.5 Comments on including the seamounts protected feature in the management options were noted in responses from the environment/conservation group: "Given that the site designation has been suggested based on the wider functional significance of the site, and in particular the seamount's significance as a spawning ground for blue ling and blue whiting, management options should be established in ways that maintain or enhance this overall function".

5.19.6 There was a request for clarity over the geographic extent of the measures for the removal or avoidance of pressures associated with mobile bottom contact gear, and of set netting from areas of deep sea sponge aggregations and of seamount communities.

Socioeconomic

5.19.7 Environment/conservation respondents wanted to see wider ecological benefits considered in management options and socioeconomic assessment. Some of these respondents saw displacement costs as modest when compared to ecological benefits. One from this group set out a list of regulation and management elements that they would like to see applied to deep sea fishing in this pMPA.

Summary - Rosemary Bank Seamount

A small number commented; most supported the designation and the management options for this pMPA.

5.20 SMALL ISLES

5.20.1 The protected features that the Small Isles pMPA will **conserve** are:

- Biodiversity: Black guillemot, burrowed mud, circalittoral sand and mud communities, fan mussel aggregations, horse mussel beds, northern feather star aggregations on mixed substrata, northern sea fan and sponge communities, shelf deeps, and white cluster anemones
- Geodiversity: Quaternary of Scotland

5.20.2 The Small Isles pMPA attracted comment from 34 respondents (13 individuals and 21 organisations including many from the environment/conservation group). Again, many individuals (48) submitted a campaign plus response, as described in Chapter 1, calling for the protection of black guillemots and for other seabirds to be protected in this area. The table below shows the total numbers commenting on this pMPA.

Table 5.8
Number commenting on the Small Isles pMPA

	Number commenting
I support the MPAs proposed for black guillemot, and believe all other seabird species should have similar protection. The Scottish Government must take action now and designate MPAs for seabird feeding areas to help stop these declines before our cliffs fall silent [and variations]. (seabird campaigns)	1,626
Campaign plus responses	48
Standard responses	34
Total	1,708

Designation

5.20.3 There was broad support for this pMPA however respondents made a number of suggestions and these included:

- That the designation should include basking shark, minke whale and harbour porpoise, and native oysters.
- That the objective for fan mussel aggregations and northern feather star aggregations should be recover rather than conserve.
- That the objective for all protected features in the area to be recover rather than conserve.
- That other seabirds and the Manx shearwater colony should be added as a protected feature.

5.20.4 There were comments, from environment/conservation organisations and individuals, that the boundary be extended to the coastline of Skye and should encompass the sea lochs of southern Skye and the sea areas around the Isle of Soay as these are important areas for sea trout. This would also mean that other features could be included such as maerl beds, seagrass beds, burrowed mud habitat, blue mussel beds, kelp and seaweed on sublittoral sediment, low or variable salinity habitats, native oysters and

basking shark. Should this not be possible then, respondents requested, a Research and Demonstration MPA should be developed. There were reports of voluntary survey work underway in the lochs and requests for the lochs to be surveyed properly.

Management Options

- 5.20.5 Respondents supported the management options; there were suggestions that measures should be set jointly for the pMPA and the SPA that it overlaps.
- 5.20.6 There was a request from the environment/conservation group that this pMPA is considered in the draft seaweed policy statement consultation, especially with regards guidance for harvesting wild seaweed.
- 5.20.7 While there was support for the management of bottom impacting gear in the Sound of Canna; some respondents felt the entire site should be protected in this way. Also in relation to the Sound of Canna, respondents from the environment/conservation group recommended that the licensed dredge spoil sites be rescinded.
- 5.20.8 A tourism/ recreation respondent commented that only bottom and fixed gear fishermen will be affected and asked for information on the cumulative effects of measures on this group across the network. Again, a static fishing respondent supported the pMPA but wanted to be sure that this would not have any negative impacts for creel fishers.
- 5.20.9 There were calls for rigorous assessment of any future aquaculture developments in the area.
- 5.20.10 A local authority noted that fishing activity does not have the same environmental scrutiny as aquaculture within this pMPA and gave as an example: "Loch Kishorn, this was previously designated by SNH as a Marine Conservation Area in order to afford some protection to the sea pen population. This meant additional scrutiny during the development of fish farming but had no bearing on fishing pressure to the extent that one of the few remaining locations that sea pens are found in significant numbers within the Loch are amongst the fish farm anchors."
- 5.20.11 A mobile fishing respondent commented that low horsepower prawn trawlers and scallop dredgers have been working in the area for nearly 50 years without evidence of impacting upon the protected features. They said that "Zoning of the mobile tows can be easily agreed with skippers so that they can avoid the features within the site and that would be a sensible management plan for that area". This respondent wanted a tonnage and horsepower cap to ensure large vessels do not fish the site. They also stressed the need to avoid displacement of current mobile gear activity "as that would simply divert effort onto other areas that are fully-exploited and possibly create additional gear conflict amongst static gear vessels".

Socioeconomic

5.20.12 Respondents commented on the importance of this area for seabird, angling and wildlife tourism and felt the MPA designation could promote this and therefore benefit the local economy further.

5.20.13 There were calls for further survey work to identify deep relic mud features in the peripheral deep basins adjacent to the Sound of Canna.

5.20.14 Environment/conservation respondents said: “As this is the best remaining area of deep burrowed mud in inshore waters it is essential to set up a monitoring programme that allows assessment of the expansion and recovery of the species and habitats in areas adjacent to the core zone”.

5.20.15 The importance of the area for shellfish farming and scallop diving was also mentioned; respondents felt this would benefit if the seabed is protected from dredging. Respondents from the environment/conservation and local authority groups felt that the displacement costs would be outweighed by ecological benefits.

5.20.16 Respondents commented that the pMPA has the support of local communities.

Summary – Small Isles

There was support for designation and for protected features in this pMPA and requests to include various marine mammal, shellfish and seabird species.

There were some suggestions to extend the boundary to the coastline of Skye and to include the sea lochs of southern Skye and the sea areas around the Isle of Soay.

Respondents supported the management options and there were suggestions that measures should be set jointly for the MPA and the SPA that it overlaps.

5.21 SOUTH ARRAN

5.21.1 The protected feature which the South Arran pMPA will **recover** is:

- Biodiversity: Maerl beds

5.21.2 The protected features that the South Arran pMPA will **conserve** are:

- Biodiversity: Burrowed mud, herring spawning grounds, kelp and seaweed communities on sublittoral sediments, maerl or coarse shell gravel with burrowing sea cucumbers, ocean quahog, seagrass beds, and shallow tide-swept coarse sands with burrowing bivalves

5.21.3 Forty-three respondents commented on the South Arran pMPA including nine individuals and 34 organisations across most groups. In addition, many other individuals (1,315) submitted campaign text, as mentioned in Chapter 2, calling for the area to extend around Arran and for a return to the 3 mile limit with no trawling or dredging until fish stocks have recovered. Others (46) submitted a campaign plus response, as described in Chapter 1, based on the campaign text. The table below shows the total numbers commenting on this pMPA.

Table 5.9
Number commenting on the South Arran pMPA

	Number commenting
<p>I agree with the location and designation of the proposed South Arran Marine Protected Area as part of an ecologically coherent network of Clyde and Scottish MPAs. The area proposed around the South of Arran is a positive step forward and will help the sea bed and sea life to recover, but will only be effective if bottom trawling and dredging is prohibited from the whole area. In my view the MPA should extend all around Arran and be linked to Clyde-wide spatial and effort control measures designed to recover the health and productivity of the Clyde Sea. Black guillemot should be included as marine priority feature of the Arran MPA.</p> <p>I support COAST's proposed management options and disagree with Scottish Natural Heritage's management recommendations. All bottom towed trawls, dredgers and hydraulic gear should be excluded from the entire proposed MPA not just from a few areas as SNH propose. This is vital if we are to conserve and recover the nature conservation features throughout the proposed MPA. Properly managed creeling, shellfish diving, and angling should be allowed.</p> <p>A healthy and productive Clyde Sea is essential to the economy of coastal communities around the Clyde and the West of Scotland. Increased biodiversity and productivity will benefit commercial fishermen, recreational sea anglers and also tourism, which is the most important economic driver in the Clyde [and variations]. (South Arran campaign)</p>	1,315
Campaign plus responses	46
Standard responses	43
Total	1,404

Designation

- 5.21.4 The proposal for this pMPA came partly from a 3rd party local environment group. This organisation both replied to the consultation and also produced an alternative questionnaire as described above. In their detailed response they described the reasons behind their proposal: that the area includes a diversity of habitats, some of which are important contributors to carbon sequestration and climate change mitigation and that there is widespread support in the area for a ban on dredgers and bottom trawlers. They also commented that “many residents on Arran, visitors to the island and respondents to the MPA consultation would prefer the MPA to extend all round the Isle of Arran.”
- 5.21.5 There was broad support from most respondents who commented for the designation, with particular support for the protection of the seagrass and maerl beds. This pMPA is one of three proposed in the Clyde and some respondents voiced support for all three. Respondents, from the environment/conservation group asked that the objectives for protected features in all three be set to recover rather than conserve as there is evidence of a decline in species richness. There was a call from individuals and a local group for seabirds to be protected within this pMPA.
- 5.21.6 Some of the environment/conservation respondents asked that the objective for seagrass beds should be set to recover rather than conserve as they may have been damaged by the anchorage in Whiting Bay. Respondents also asked that the other protected feature habitats in the area are set to recover “since the ecological status of the possible MPA is only ‘moderate’ as a result of morphological alteration from commercial fishing.”
- 5.21.7 There was a query from an aquaculture respondent who asked for clarification as to “why this location is considered a good example of burrowed mud within the network?” A local authority made a similar comment and also voiced concern over the evidence used to support the inclusion of some benthic features.
- 5.21.8 Respondents, mainly individuals but also from the environment/conservation group, wanted to see bottom trawling and dredging prohibited in the area.
- 5.21.9 In lengthy and detailed responses, mobile fishing respondents submitted views on the 3rd party proposal to draw the boundary for this pMPA at the old 3 mile limit. These respondents said no evidence had been produced, and erroneous assumptions made, in producing the proposal. They also commented on a lack of evidence for describing the introduction of scallop dredging following the abolition of the 3 mile limit as being responsible for the destruction of the seabed. These respondents pointed out that scalloping has always been legal in fishing areas in the Clyde. In addition, the mobile fishing respondents said there had been no corroboration of the evidence submitted to support the existence of maerl at the Iron Ledges.
- 5.21.10 The organisation that had made the 3rd party proposal said that their data was verified by an independent consultant and the application assessed by SNH, after which the size was increased to include a maerl bed north of Blackwaterfoot.

5.21.11 The mobile fishing respondents discussed the protected features and commented that Kelp and seaweed communities on sub littoral sediment and tide-swept algae communities and Maerl or coarse shell gravel with burrowing sea cucumbers, do not appear on the OSPAR list of threatened and/or declining species, and that seagrass beds are already protected. In relation to the maerl beds, these respondents said that while these appear on the Region 3 OSPAR list, they are already protected in the Lamlash Bay NTZ which is within the boundary of the pMPA. These respondents said “designation is for the purpose of contributing towards the OSPAR ECN only, there cannot be any designation which is not for that purpose”. They also wanted to see far less replication of protected features within the network. These respondents called for any evidence used to be corroborated and wanted management measures to be agreed before designation takes place. Supporting the MPA process and the intention to create a network, on OSPAR guidelines, these respondents said that in order to turn their support into assistance, “fishermen must be persuaded that the process being followed is fair and reasonable and that sacrifices which they will be asked to make are at the minimum needed to ensure compliance with the Law”. They concluded that this test is not being met “in relation to compliance with the Act, the UK Act and the OSPAR Convention.”

Management Options

5.21.12 Most of those who commented, particularly individuals and environment/conservation respondents, supported the management options for this site. One environment/conservation respondent, however, said that a more holistic approach to managing fishing activity across all three Clyde pMPAs should be adopted and that cumulative impact rather than case-by-case should be considered.

5.21.13 Respondents, a local authority and an organisation in the environment/conservation sector, said that the designation of this MPA will contribute to marine tourism and marine education.

5.21.14 An aquaculture respondent said that the management options should deal with pressures on a local rather than area-wide basis and that management will prove flexible and adaptable, for example in areas where a feature is predicted but is not actually present.

5.21.15 Commenting on anchorages, an industry/ transport respondent cautioned that removing anchorages would have significant impacts on safety; these anchorages are used by recreational rather than commercial vessels. On this subject a recreational/ tourism respondent said: “We welcome the commitment to explore further whether there might be an adverse effect of the anchorage in Whiting Bay. Any prohibition of anchoring would be likely to have a greater impact on the local community than on visiting recreational sailors.”

5.21.16 A respondent from the static fishing group said that further evidence is needed before any changes to fishing patterns, adding that “we believe that as this area has been fished sustainably over a number of years by local

fishing vessels and communities, there appears no logic to the recommendations.”

Socio-economic

5.21.17 Respondents commented on the benefits designation would bring, not only to the environment but also in relation to tourism in the area, and therefore the local economy. Increased biodiversity would also benefit commercial fishermen and contribute to the local economy through sea anglers, divers and other marine activities.

5.21.18 One local authority commented that figures indicate management measures closing parts of the area to mobile fishing gear would have a “not insignificant” economic impact.

5.21.19 A local authority wanted to see the economic impact of the planned Clyde MPAs to be assessed cumulatively as well as individually.

5.21.20 A respondent from the aquaculture group suggested that costs associated with planning applications should be considered at a local level as well as nationally.

Summary – South Arran

There was broad support for the designation in both campaign responses and other responses and there were also many requests to include protection for seabirds.

Many respondents asked for the boundary to extend around Arran and for bottom trawling and dredging to be prohibited in the area, these suggestions were opposed by fishing interests.

There were calls for the objectives for protected features in this and the other Clyde pMPAs to be set to recover rather than conserve.

Fishing interests disputed the basis for designating the protected features as well as the proposed management options.

Many respondents supported the management options for this site

5.22 THE BARRA FAN AND HEBRIDES TERRACE SEAMOUNT

5.22.1 The protected features that The Barra Fan and Hebrides Terrace Seamount pMPA will **conserve** are:

- Biodiversity: Burrowed mud and offshore deep sea muds, offshore subtidal sands and gravels, orange roughy, seamount communities, continental slope and the seamount
- Geodiversity: Quaternary of Scotland- iceberg ploughmark field, prograding wedges, Submarine Mass Movement - continental slope turbidite canyons, slide deposits, Marine Geomorphology of the Scottish Deep Ocean Seabed-scour moat, Cenozoic Structures of the Atlantic Margin - continental slope, Hebrides Terrace Seamount

5.22.2 Seventeen respondents commented on The Barra Fan and Hebrides Terrace Seamount pMPA; two individuals and 15 organisations, many from the environment/conservation and international fisheries groups.

Designation

5.22.3 Many voiced support for the designation of what several respondents described as an important area; the seamount was described, by environment/conservation respondents as “significant to the health of Scotland’s seas” due to its effect on underwater currents.

5.22.4 There was a concern that the area could be developed for oil and gas in the future.

Management Options

5.22.5 The management options were noted or agreed by many of those commenting on this pMPA.

5.22.6 Respondents commented that the area is located on the Irish / Scottish boundary and one environment/conservation respondent said that efforts should be made to ensure management is consistent across the boundary.

5.22.7 Other issues raised by the environment/conservation group included:

- A request for clarification on the features presented as point localities.
- Consideration of sperm whales within the management options.
- The need for a stringent consenting process for proposed licensed activities.
- Concern that there are no management options for the large-scale biodiversity search features seamounts and continental slope.
- Comments on ecological damage caused by bottom trawling, and large demersal netting on or near seamounts.

5.22.8 The international fisheries group commented on the importance of the area to the French and Spanish fleets, with the Spanish fisheries respondent commenting that the habitats covered by this pMPA are not listed as of special interest in the Habitat Directive and suggesting the designated area be limited to the seamount. The French fisheries respondents wanted only

the western part of the area to be designated to allow fishing to continue in the east saying in particular that the protection for orange roughy does not seem relevant for the eastern part of the area.

- 5.22.9 The need for robust management was stressed by a static fishing respondent who also wanted to ensure that creel fishers will not lose fishing opportunities in the designated area.

Socioeconomic

- 5.22.10 Many of the points made in relation to the management options were repeated here and in addition, many of the environment/conservation respondents commented on the socioeconomic impact data in the BRIA which, they felt, indicated modest displacement costs which would be outweighed by the ecological benefits. One from this group set out a list of regulation and management elements that they would like to see applied to deep-sea fishing in this pMPA.

- 5.22.11 The international fisheries reported that the options for this area would lead to financial losses for the French and Spanish fleet while a public sector body was concerned that there may be impacts on investment opportunities in relation to oil and gas activity in the area.

Summary – The Barra Fan and Hebrides Terrace Seamount

There was broad support for the designation and management options although some wanted to see changes to the boundary, stressing the importance of the area for fishing interests.

5.23 TURBOT BANK

5.23.1 The protected feature which the Turbot Bank pMPA will **conserve** is:

- Biodiversity: Sandeels

5.23.2 Thirteen respondents commented and this included two individuals and 11 organisations; many of the organisations were from the environment/conservation group and many voiced support for the designation of this pMPA.

Designation

5.23.3 There were comments, from the environment/conservation group, that the objective for sandeels should be recover rather than conserve and some commented that there has been no sandeel monitoring in the area, therefore its status is unknown. The environment/conservation group also commented that many seabirds from mainland colonies also use the area; this should be considered when deciding the management plan.

Management Options

5.23.4 The environment/conservation group did not want to see a targeted sandeel fishery in the Turbot Bank pMPA. This group also commented that there is no discussion of bottom impact on sandeels although dredging takes place on the site and that evidence is needed to show this does not impact on the sandeels. There were also calls to include offshore subtidal sands and gravels as a protected feature in this area.

5.23.5 There was again support for the pMPA from a static fishing respondent with the proviso that creel fishers will not lose any fishing opportunities.

Socioeconomic

5.23.6 Respondents, from the environment/conservation and static fishing groups, listed economic and wellbeing benefits from designating this area. The environment/conservation groups also said: "A decrease in sandeel spawning stock biomass induces a higher cannibalism for cod and whiting, leading in turn to a decrease in spawning stock biomass and yield for those predator species. This should be considered as part of the environmental baseline and a switch away from cannibalism should be considered as a benefit of designating this site."

5.23.7 Again, there were requests that the objective for sandeels change from conserve to recover so that the site may "benefit the wider North Sea through the provision of sandeel larvae, and contribute to attaining the obligations under the Birds Directive for the seabird colonies using the site for foraging."

Summary – Turbot Bank

There was broad support for the designation with some also calling for the objective for sandeels to be recover rather than conserve.

5.24 UPPER LOCH FYNE AND LOCH GOIL

5.24.1 The protected feature which the Upper Loch Fyne and Loch Goil pMPA will **recover** is:

- Biodiversity: Flame shell beds

5.24.2 The protected features that the Upper Loch Fyne and Loch Goil pMPA will **conserve** are:

- Biodiversity: Burrowed mud, horse mussel beds, ocean quahog, and sublittoral mud and mixed sediment communities

5.24.3 Comments on the Upper Loch Fyne and Loch Goil pMPA were noted in 38 responses including 12 from individuals and 26 from organisations; many of the organisations were from the environment/conservation group. This pMPA is one of three proposed in the Clyde area, along with Clyde Sea Sill and South Arran; many comments on this pMPA relate to all three of these sites.

Designation

5.24.4 Many respondents who commented voiced support for the designation of the Upper Loch Fyne and Loch Goil pMPA.

5.24.5 Environment/conservation respondents wanted to see fireworks anemones and the Arctic relic seasquirt *Styela gelatinosa* in Loch Goil added to the protected features as well as the sheltered rock reefs in both lochs. These respondents wanted to see objectives for all protected features in this area as recover rather than conserve.

5.24.6 An aquaculture respondent asked for clarification on the pressures that sublittoral mud and mixed sediment communities are sensitive to as, they commented, this feature is not considered in the Feature Activity Sensitivity Tool (FEAST matrix).

5.24.7 Individuals felt that whitefish stocks in the Clyde have been affected by overfishing, dredging and trawling. There were reports of serious gear conflicts and creels being lost and comments on the need for good management and good communication.

5.24.8 A local authority supported the designation but noted that there is uncertainty over the distribution of the protected features. This respondent pointed out inconsistency in different documentation between recover and conserve which needs to be corrected and clarified.

Management Options

5.24.9 An aquaculture respondent had several queries and requests for clarification on the management options such as what is meant by expansion in the 'reduce or limit pressures associated with expansion of existing finfish farms etc'.

- 5.24.10 An environment/conservation respondent made a large number of points. They wanted all objectives to be set as recover rather than conserve. This respondent cautioned that any shellfish farms should be sited away from finfish farms to avoid any contamination of farmed and wild shellfish. They saw finfish farms as incompatible with MPA objectives and wanted to see no further expansion and for existing farms to complete environmental impact assessments. Other comments included disagreement with SNH recommendations on trawling and dredging; this respondent saw the need for proper regulation of bottom trawlers and said that trawling and dredging should not take place within the Clyde MPAs. Creeling should also be managed to ensure sustainability and scallop diving should be kept under regular review.
- 5.24.11 Other environment/conservation respondents commented that management must consider the whole area and not just sites with aquaculture activity as some pressures such as pollution are not contained to these sites. As well as removing bottom mobile gear, these respondents also agreed that pressures associated with static gear should be removed from the flame shell and horse mussel beds but some also wanted to see it removed from ocean quahog areas and muds which may contain fireworks anemones.
- 5.24.12 One environment/conservation respondent said that a more holistic approach to managing fishing activity across all three Clyde pMPAs should be adopted and that cumulative impact rather than case by case should be considered.
- 5.24.13 Individuals were concerned that there had been overfishing in the past and some wanted to see trawling, dredging and creel fishing stopped in the area.
- 5.24.14 A static fishing respondent supported this pMPA with the proviso that creel fishers will not lose any fishing opportunities. Another from this group wanted to see more evidence before any changes to fishing patterns are implemented and also commented on the importance of this area to the Kintyre fleet in winter months.

Socioeconomic

- 5.24.15 A environment/conservation respondent said that: "The socioeconomic Sustainability Appraisal assumes that there will be no displacement of fishing effort and that there will be a net loss of income to fishermen. However the Strategic Environmental Assessment assumes that there will be displacement and this may have a detrimental impact on other areas." Another respondent noted an inconsistency between the BRIA and management options paper.
- 5.24.16 While some respondents from the environment/conservation group felt that displacement costs would be outweighed by ecological benefits, another from the same group was concerned "about the resultant socioeconomic losses where sustainable operations may be curbed or altered, particularly due to indirect effects of fishing activity displacement".

5.24.17 A local authority wanted to see “the economic impact of management measures for the three MPA proposals within the Firth of Clyde are considered cumulatively as well as individually”.

5.24.18 One aquaculture respondent wanted to see costs associated with new planning consent considered in the socioeconomic assessment.

Summary – Upper Loch Fyne and Loch Goil

There was broad support for the designation with some also calling for additional protected features and for all protected features in this area as recover rather than conserve.

There were many suggestions and some requests for clarification with regards the management options.

5.25 WEST SHETLAND SHELF

5.25.1 The protected feature which the West Shetland Shelf pMPA will **conserve** is:

- Biodiversity: Offshore subtidal sands and gravels

5.25.2 Twelve respondents commented on the West Shetland Shelf pMPA and this included four individuals and eight, mainly environment/conservation, organisations.

Designation

5.25.3 Most respondents who commented at this question supported the designation of this pMPA.

Management Options

5.25.4 Environment/conservation respondents welcomed the proposals to prohibit bottom-contact mobile fishing gear in this area, and welcomed this approach in the current Windsock Fisheries Area. These respondents suggested there should also be some designated zones prohibiting static gear “to ensure sizable proportions of marine fauna have reduced pressure from harvesting and have opportunity for future enhancement.” There were also comments on the need to regulate any licensed industry activities.

5.25.5 A public sector respondent offered details of existing assets, such as power cables, in the area.

5.25.6 The management options say that that no additional management is required in relation to bottom contacting mobile gear as no mobile gear fisheries currently take place in the area. There was concern, from a mobile fishing respondent, over this option as they felt that where there is no evidence of damage, there should be no management measures.

Socioeconomic

5.25.7 Respondents from the environment/conservation group saw the figures on displacement and cost of designation as relatively small when compared to potential ecological benefit.

Summary – West Shetland Shelf

A small number commented on this pMPA and supported the designation and management options.

5.26 WYRE AND ROUSAY SOUNDS

5.26.1 The protected features that the Wyre and Rousay Sounds pMPA will **conserve** are:

- Biodiversity: Kelp and seaweed communities on sublittoral sediment, and maerl beds.
- Geodiversity: Marine Geomorphology of the Scottish Shelf Seabed

5.26.2 Twenty respondents commented on the Wyre and Rousay Sounds pMPA; three individuals and 17 organisations (mainly public sector, recreation/ tourism and environment/conservation).

Designation

5.26.3 Most of the comments made by respondents supported the designation of the Wyre and Rousay Sounds pMPA although one local group wanted to see it extended around the south and east of Wyre. There were several comments on the importance of the maerl beds.

Management Options

5.26.4 The management options were supported by most of those who commented.

5.26.5 A public sector respondent questioned the description of the anchorage in the area as commercial; they saw it more as historical and would support its removal due to the proximity to power cables. An industry/ transport respondent, however, said that safety factors may have led to this anchorage and this should be taken into account in any proposal to relocate. There was a comment that the summary contradicts the text of the management options with regards recreational anchoring.

5.26.6 A recreation/ tourism respondent was concerned about the effect on maerl beds of a number of salmon farms in the area and an environment/conservation respondent said they would support relocation of any farms that are causing damage to protected features. A proposed finfish farm was noted; some respondents felt this would have a negative impact on the maerl beds; one mobile fishing respondent said that there had been flaws made in assumptions over pollutants in respect of this application. Other respondents noted their support for the proposed management option to limit development of new sites or expansion of current finfish farms. Respondents from various groups commented on the need to ensure no harmful chemical effects from salmon farming in the area.

5.26.7 Commenting on farms in the area, a local authority supported the acknowledgement there would not be any restriction or infringement on existing farms and wanted to see minimal disruption to their operations. This respondent also said they would oppose any measures to restrict the activity or growth at a crab, lobster and scallop fishery in the area.

5.26.8 There were comments from the environment/conservation group on the need to monitor any impact caused by static gear and hand-dived bivalve fishery. This group also commented on a lack of detailed information on the impacts

of aquaculture and said that precautionary management measures should be used.

- 5.26.9 A mobile fishing respondent queried a limit on hand-diving saying that “if conserving maerl is the objective of the designation then this management option would seem to be irrelevant.”
- 5.26.10 A public sector respondent offered details of existing assets, such as power cables, in the area.
- 5.26.11 Commenting on a potential tidal energy development in a nearby site, environment/conservation respondents said: “it is imperative that any possible impact on changes to the tidal regime affecting the excellent quality habitats in Wyre and Rousay Sound should be fully considered.”

Socioeconomic

- 5.26.12 Environment/conservation respondents commented that static gear and dived fisheries may benefit from a reduction in mobile gear in the area. These respondents also felt there would be positive benefits; both economic and in relation to emotional wellbeing; amongst divers and anglers.
- 5.26.13 There was a call for a “comprehensive socioeconomic study into the current and non-damaging nature of the fishing activity in the area” and for guarantees that current fishing activity would continue.

Summary – Wyre and Rousay Sounds

Respondents supported the designation and management options.

A number of respondents commented on the impact of or on existing and proposed finfish farms in the area.

5.27 SITE SUMMARIES

5.27.1 This Chapter presents summaries of responses, from both campaign and standard consultation responses, relating to the sites discussed in Chapters 5.1 to 5.26.

Summary - Clyde Sea Sill

5.27.2 There was support for the designation of this MPA and for the protected features; there were requests to include the kelp forest and other seabird species.

5.27.3 Several respondents pointed out that data used for species counts are 15 years out of date and wanted to see this addressed.

5.27.4 The management options were welcomed.

5.27.5 Respondents, across various organisational groups, felt that designation would be beneficial to the area in terms of both the economy and well-being.

Summary - East Caithness Cliffs

5.27.6 There was support for designation and for protected features in this pMPA and requests to include the kelp forest and other seabird species.

5.27.7 Some felt that this pMPA should be considered in the draft seaweed consultation

5.27.8 Several respondents pointed out that data used for species counts are 15 years out of date and wanted to see this addressed.

5.27.9 The management options were welcomed and there was welcome for the alignment of this pMPA with the existing SPA in the same area.

Summary - East of Gannet and Montrose Fields

5.27.10 There was support for designation and for the management options. The importance of the ocean quahog and offshore deep sea mud and gravel communities was specifically noted. There were, however, a small number of concerns with regards to the economic importance of this area, especially with regards to Oil and Gas interests.

Summary - Faroe-Shetland Sponge Belt

5.27.11 There was support for designation and for the management options although a number of respondents would support a smaller area.

5.27.12 There were differences in opinion between sectors (particularly environment and fishing) over restrictions on fishing in the area.

Summary - Fetlar to Haroldswick

5.27.13 There was support for designation and for protected features in this pMPA and requests to include other seabird species. There were calls for the objective for horse mussel beds, maerl beds, and kelp and seaweed communities to be recover rather than conserve.

5.27.14 The management options attracted broad support and there was welcome for the inclusion and recognition of existing measures.

5.27.15 A small number of respondents wanted to ensure that those involved in fishing the area are consulted over the plans for reducing or limiting pressures from any fishing activity.

5.27.16 While there were some calls to extend dredging restrictions across the area, extend anti-predator methods to a 5km radius from nest sites and relocate any farms causing damage, there were also concerns over potential impacts on the shellfish business, with consequent impacts for employment and other factors in the area.

Summary - Hatton-Rockall Basin

5.27.17 A small number commented and supported the designation and management options.

Summary - Loch Creran

5.27.18 There was broad support for the designation and management options.

5.27.19 Some would prefer the objective of recover rather than conserve for the flame shell beds.

Summary - Loch Sunart

5.27.20 There was broad support for the designation and management options.

5.27.21 Some would prefer the objective for the features, and especially the serpulid aggregations, to be recover rather than conserve.

5.27.22 There were differences in opinion between sectors over restrictions on fishing in the area.

5.27.23 Some commented on the need to involve local communities and all other stakeholders in the management of the pMPA.

Summary - Loch Sunart to the Sound of Jura

5.27.24 There was broad support for this designation but also several suggestions for changes including extending the area, reducing the area and adding various seabird species to the protected features.

5.27.25 While there was broad support for the management options, again there were some differences in opinion between sectors over restrictions on fishing in the area.

5.27.26 There were comments on a lack of data, especially in relation to the common skate.

Summary - Loch Sween

5.27.27 There was broad support for this designation and management options. Some respondents felt the objectives for the maerl beds and native oyster should be recover rather than conserve.

5.27.28 There were calls for a more realistic assessment of fishing levels in the area and clarity over the likely levels of fishing restrictions. Some asked for recreational anchorages to be reviewed to ensure these are not in the vicinity of maerl beds.

Summary - Loch Duich, Long and Alsh

5.27.29 There was broad support for this designation. Some respondents wanted to see the objective for burrowed mud set to recover rather than conserve. There were some calls to add fan mussels to the list of protected features; again set to recover.

5.27.30 There was also broad support for the management options.

Summary - Monach Isles

5.27.31 There was support for designation and for protected features in this pMPA and requests to include other seabird species and for kelp forests to be protected. Some felt that this pMPA should be considered in the draft seaweed consultation

5.27.32 The management options were broadly supported.

Summary - Mousa to Boddam

5.27.33 The designation was agreed although there were some suggestions that the boundary should change to include possible sandeel habitat beyond the proposed area.

5.27.34 Some called for the objective for sandeels to be set as recover rather than conserve and for kelp forests to be protected.

5.27.35 There were also calls for research into the impact of demersal dredge on sandeels.

Summary - North-east Faroe Shetland Channel

5.27.36 Most respondents supported the designation but there was acknowledgement of the importance of the area to the fishing industry with respondents asking for monitoring and compliance of fishing activity as well as engagement with the industry.

5.27.37 There was some concern that there are no management options to protect the continental slope.

Summary - North-west Orkney

5.27.38 Most respondents supported the designation although some called for the objective for sandeels to be set to recover rather than conserve.

5.27.39 Most supported the proposal to limit any future sandeel fishery in the area.

Summary - North-west sea lochs and the Summer Isles

5.27.40 While there was support for the designation there were also conflicting suggestions; some wanted to see the area extended while others felt it should be reduced.

5.27.41 There were calls to add seagrass beds and sea trout to the protected features.

5.27.42 Some suggested the area should be called Wester Ross to give a clear local identity, foster local interest and give a greater sense of local ownership.

5.27.43 There was support from most respondents for the management options.

Summary – Noss Head

5.27.44 There was broad support for the designation and the management options for this pMPA.

Summary - Papa Westray

5.27.45 There was support for designation and for protected features in this pMPA and requests to include the kelp forest and other seabird species.

5.27.46 Some felt that this pMPA should be considered in the draft seaweed consultation.

5.27.47 There was broad support for the management options.

Summary - Rosemary Bank Seamount

5.27.48 A small number commented; most supported the designation and the management options for this pMPA.

Summary – Small Isles

5.27.49 There was support for designation and for protected features in this pMPA and requests to include various marine mammal, shellfish and seabird species.

5.27.50 There were some suggestions to extend the boundary to the coastline of Skye and to include the sea lochs of southern Skye and the sea areas around the Isle of Soay.

5.27.51 Respondents supported the management options and there were suggestions that measures should be set jointly for the MPA and the SPA that it overlaps.

Summary – South Arran

5.27.52 There was broad support from both campaign and standard consultation respondents who commented for the designation along with requests to include protection for seabirds.

5.27.53 Many respondents asked for the boundary to extend around Arran and for bottom trawling and dredging to be prohibited in the area; these suggestions were opposed by fishing interests.

5.27.54 There were calls for the objectives for protected features in this and the other Clyde pMPAs to be set to recover rather than conserve.

5.27.55 Fishing interests disputed the basis for designating the protected features as well as the proposed management options.

5.27.56 Many respondents supported the management options for this site

Summary – The Barra Fan and Hebrides Terrace Seamount

5.27.57 There was broad support for the designation and management options although some wanted to see changes to the boundary, stressing the importance of the area for fishing interests.

Summary – Turbot Bank

5.27.58 A small number commented and most supported the designation with some also calling for the objective for sandeels to be recover rather than conserve.

Summary – Upper Loch Fyne and Loch Goil

5.27.59 There was broad support for the designation with some also calling for additional protected features and for all protected features in this area as recover rather than conserve.

5.27.60 There were many suggestions and some requests for clarification with regards the management options.

Summary – West Shetland Shelf

5.27.61 A small number commented on this pMPA and supported the designation and management options.

Summary – Wyre and Rousay Sounds

5.27.62 Respondents supported the designation and management options.

5.27.63 A small number of respondents commented on the impact of or on existing and proposed finfish farms in the area.

6 CHOICES

6.1 For certain features there are options and alternatives to represent them in the network. The consultation seeks views on choices for:

- Offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in OSPAR Region II
- Burrowed mud feature in the Fladens
- Offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V

Offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds

6.2 The choices as to the representation of the Offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in OSPAR Region II are:

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

6.3 Twenty-six respondents stated a preference (10 individuals and 16 organisations, mainly from the environment/conservation group). The majority of these standard responses (20 respondents) included support for the Firth of Forth Banks option. As described in Chapter 1, six campaign plus respondents also supported the Firth of Forth Banks Complex. In total 6,503 respondents included support for the Firth of Forth Banks Complex in their submission.

6.4 Three respondents supported an alternative; one recreation/ tourism and two energy respondents supported the Turbot bank and Norwegian Boundary Sedimentary Plain option.

6.5 Two individuals and an environment/conservation respondents supported the option of the Firth of Forth Banks Complex, Turbot bank and Norwegian Boundary Sedimentary Plain, although their subsequent comments indicated support for the Firth of Forth Banks Complex.

6.6 The table below shows the numbers supporting the Firth of Forth Banks Complex.

Table 6.1
Number supporting the Firth of Forth Banks Complex option

	Number supporting
The Firth of Forth is the most important site on our coastline for sandeels, which are an essential source of food for Scotland's seabirds. This site must be protected and so should others like it [and variations] (seabird campaigns)	1,626
The Firth of Forth Banks MPA proposal must go forward to best represent offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the southern North Sea in line with JNCC advice. The other choices presented do not make the same contribution to wider North Sea ecosystem function, are not ecologically equivalent and therefore are not acceptable alternatives. Sandeels and seabirds should also be protected features at Firth of Forth Banks. (network campaign)	2,615
Evidence suggests that the features within the Firth of Forth Banks Complex are of functional significance to the overall health and diversity of Scotland's seas more widely. The Firth of Forth Banks MPA therefore must be designated, because it is JNCC's preferred proposal and the suggested alternatives to the site do not make equivalent contributions to the network. (network campaign)	662
The Firth of Forth Banks is unique and must be designated as a Nature Conservation MPA. The scientific advice clearly recommends the designation of this site over the alternative proposal of Turbot Bank and Norwegian Sediment Plain. (network campaign)	1,526
Campaign plus responses	48
Standard responses	26
Total	6,503

- 6.7 The main reason for supporting the Firth of Forth Banks Complex was the importance of the area for sandeel habitats. There were calls for sandeels and seabirds to be added as protected features in this area. Several respondents commented that the alternatives would not constitute an ecologically equivalent contribution to the network. There were also several comments that it best represents offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds in the southern North Sea.
- 6.8 Comments on designation centred mainly around the need to protect seabirds and sandeels with a small number commenting on the importance of other suggested protected features for the area, including ocean quahog aggregations, offshore subtidal sands and gravels, harbour seals, minke whales, harbour porpoises and dolphins .
- 6.9 A small number of respondents voiced support for the conserve objective for all protected features in the Firth of Forth Banks Complex.
- 6.10 An energy respondent commented that designating the Norwegian Boundary Sedimentary Plain could lead to conflict with the oil and gas industry and a public sector respondent made a similar point. Respondents also mentioned a number of assets in this area including a telecoms cable, oil and gas pipelines and potential carbon storage sites.

- 6.11 The two energy respondents who favoured the Turbot Bank and Norwegian Boundary Sedimentary Plain option had concerns about an overlap of the Firth of Forth Banks with the Firth of Forth Round 3 Zone and the development of offshore wind capacity; one said they had made significant investment in “responsible development of projects in the Zone”.
- 6.12 Other comments on socioeconomic aspects included a small number commenting that while the Firth of Forth Banks Complex option has a higher displacement cost than the Turbot Bank and Norwegian Boundary Sediment Plain option, the Firth of Forth Banks Complex is of far greater ecological significance relative to the other two.
- 6.13 Energy respondents had concerns that “the evaluation of potential Offshore Wind projects, and the quantification of potential development cost impacts from designation of pMPAs, is inadequate and incomplete. A very specific value is given to the MPA network based on a very subjective assumption, whereas the value of renewables projects are described as uncertain.”

Summary – Offshore subtidal sands and gravels, ocean quahog and shelf banks and mounds

There was a large support for the Firth of Forth Banks Complex. The main reasons for this support were the importance of the area for sandeel habitats and that the alternatives would not constitute an ecologically equivalent contribution to the network.

Burrowed mud feature in the Fladens

6.14 The choices for representation of the burrowed mud feature in the Fladens are:

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

6.15 Eight respondents submitted a preference (five from environment/conservation and one each from energy, public sector and recreation/ tourism). Seven of these respondents supported the Central Fladen pMPA only option; the recreation/ tourism respondent favoured the Tall sea-pen component of Central Fladen, plus South-East Fladen and did not give a reason for this support.

**Table 6.2
Number supporting the Central Fladen pMPA only option**

	Number supporting
Core Central Fladen must be protected in line with scientific advice and I support the 'Central Fladen pMPA only' option to be included in the network. This would be the most ecologically coherent option, providing scope for tall sea pen recovery beyond what may be a remnant population in 'core' Central Fladen. (network campaign)	2,615
Campaign plus responses	6
Standard responses	7
Total	2,628

- 6.16 As described in Chapter 2, one campaign text included support for the Central Fladen pMPA only option; this text was submitted by 2,615 respondents while 6 standard respondents submitted a campaign plus⁴ response based on this text.
- 6.17 Respondents supported this option as they saw it as the best way to protect, and possibly expand, the tall sea pen population component of the burrowed mud MPA search feature. Most environment/conservation respondents who commented wanted to see the objective for this feature set as recover rather than conserve; one supported conserve.
- 6.18 A small number noted that the cost of managing damaging commercial fisheries and oil and gas sector activities is lower in this option than in the others.

Summary – Burrowed mud feature in the Fladens

There was a large support for the Central Fladen only option

Respondents felt this would be the best way to protect the tall sea pen population.

Offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud

- 6.19 The choices for representation of the offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud in OSPAR Regions III and V are:
- South-West Sula Sgeir and Hebridean slope
 - Geikie slide and Hebridean slope
- 6.20 Four environment/conservation respondents and one from recreation/ tourism stated a preference at this question. The environment/conservation respondents supported the Geikie slide and Hebridean slope option, while the recreation/ tourism respondent favoured the South-West Sula Sgeir and Hebridean slope option but did not give a reason.
- 6.21 The environment/conservation respondents gave similar reasons for the support of the Geikie slide and Hebridean slope option, saying that “it offers the most significant representation of northwest continental shelf slope species and communities, such as burrowed mud, offshore deep sea muds and offshore subtidal sands and gravels.” In addition, there were comments that this area has greater sighting records for whales and dolphins than the alternative area.
- 6.22 In terms of socioeconomic impacts, respondents commented that the costs of restricting damaging activities will be outweighed by ecological benefits.

Summary – Offshore subtidal sands and gravels, offshore deep sea mud, and burrowed mud

A very small number commented; most supported the Geikie slide and Hebridean slope option.

⁴ Campaign plus responses are described in paragraph 1.18

7 SUSTAINABILITY APPRAISAL

- 7.1 The consultation document explains that Nature Conservation MPAs are being identified using a science-led approach with provision for Scottish Ministers to have regard 'to any social or economic consequences of designation' during their considerations.
- 7.2 A Strategic Environmental Assessment and a Socioeconomic Assessment have been combined to form an overall Sustainability Appraisal. The Sustainability Appraisal informs the scientific recommendations with the social, economic and wider environmental considerations, while keeping sight of the overall benefits of the network.
- 7.3 The consultation set out potential costs for the sectors that may be affected: Aquaculture – finfish, Aquaculture – shellfish, Commercial fisheries, Energy generation, Military activities, Oil and gas, Port and harbours and Telecom cables.
- 7.4 Respondents were asked: 'Do you have any comments on the Sustainability Appraisal of the MPA network as a whole?' and 66 replied; this included 19 individuals and 47 organisations across most organisation groups.
- 7.5 In addition, one of the large campaigns included comment on the Sustainability Appraisal; 2,615 network campaign submissions included the following:

I do have a comment on the Sustainability Appraisal. I believe the Sustainability Appraisal does not fully account for the socioeconomic benefits that could arise from the proposed MPA network. For example, a recent study revealed that recreational diving and angling in 20 of the proposed MPAs in Scotland is valued at between £67 million and £117 million per year. In addition, divers and anglers questioned said they would make a one-off payment collectively worth between £142-£255 million to see these sites protected and damaging activities stopped. Similar studies are needed to demonstrate the benefits of the Scottish MPAs to other user groups.

- 7.6 Respondents from the mobile fishing group made a number of points. One main point was that the Sustainability Appraisal does not understand the specific circumstances of island communities. "The blunt measures of national economics do not reflect the sustainability of isles economies. The unsubsidised independent businesses of the numerous small scale fishermen that make up the fishery in Orkney survive against significant adverse conditions."
- 7.7 A small number commented that existing static gear and dive fishery activities have not harmed protected features in many of the proposed MPAs, for example around Orkney; they felt this should be established as a baseline.
- 7.8 A mobile fishing respondent wanted "a clear economic evaluation not just in terms of GVA but also in terms of the socioeconomic benefits it brings to local communities". A lack of alternative jobs for fishermen was mentioned with a

comment that “Sustainable communities are maintained by sustainable employment.”

- 7.9 A small number of aquaculture respondents said that only costs that could be quantified easily had been included and that even though other costs were difficult to quantify, such as delays or inability to expand or develop a site, they still existed and should be taken into consideration.
- 7.10 Similarly, a small number of energy respondents felt that not all costs had been included, for example deep water surveys that may be required to “underpin mitigation to deliver the management measures”.
- 7.11 The approach to displacement was seen as sensible, however, there was disappointment from the aquaculture sector that no alternative locations to the inshore or sea loch MPAs had been suggested “due to the overall number of proposed MPAs which affect the finfish aquaculture sector.” The benefits to the local economy from salmon or other fish farms were stressed as were other benefits to local communities.
- 7.12 Uncertainty, around designation, timescales and management plans, was seen as potentially damaging or negatively affecting the viability of an energy project. There was also concern that development of the network might deter investors, that there could be an impact on renewable energy and climate change targets.
- 7.13 An energy respondent asked how the Government will balance environmental goals with its goals for climate change mitigation and energy security.
- 7.14 Both mobile fishing and energy respondents commented that the Strategic Environmental Assessment assumes displacement will not occur; these respondents felt this to be unrealistic.
- 7.15 While some environment/conservation respondents said that this may not occur in many areas, others from this group commented that: “The potential effects of displacement of fishing activity have not been robustly considered within the Sustainability Appraisal and Strategic Environmental Assessment“. One said: “Perhaps more fundamentally, where fishing pressures are moved within an MPA (or indeed where exclusion of one form of fishing pressure allows a significant increase in a different fishing pressure), no explanation of how management measures would be implemented has been provided”. A local authority also commented on displacement saying that displacement to other areas may result in pressures on biodiversity in those areas; they said this effect is uncertain and unquantified; consultation with local stakeholders and additional information will be required.
- 7.16 Many of the environment/conservation respondents said that the Sustainability Appraisal was based on false assumptions and flawed information in relation to management costs. For example, upper estimates are based on complete closures of commercial fisheries but this option is seldom mentioned in management options papers. False assumptions on baselines were also a concern; the baseline referred to in documents was described as “neither accurate nor appropriate. In particular, it assumes that if no MPAs are

designated, the current situation would continue and, as such, there would be no cost to any activity”.

- 7.17 One environment/conservation respondent felt that the current proposals protect the status quo and are dependent on further discussion with the commercial fishing sector.
- 7.18 Another environment/conservation respondent, commenting on research into the value of recreational diving and angling in MPAs, asked if similar research had been undertaken with other user groups; this information is needed to account fully for the socioeconomic benefits from the proposed network.
- 7.19 Some environment/conservation respondents commented on a recent survey by Kenter et al (2013) saying that this is a useful starting point for evaluating the indirect and non-use value of MPAs and for illustrating the value of MPAs to diving and angling.
- 7.20 Respondents from this group, along with individuals, were concerned that only potential losses to the mobile fishing sector had been quantified and that the potential positive value in terms of tourism, static fishing, diving and sea angling had not been adequately quantified. A environment/conservation respondent said the Sustainability Appraisal “must therefore be understood as presenting a worst case scenario on the one hand (likely displacement of fishing activity is not included for instance) and a weak financial benefits case on the other.”
- 7.21 Many of the mobile fishing group commented that the potential for displacement must be considered prior to designation: “There is a reason why vessels fish where they do, that is where the most productive grounds are and displacement is likely to have cost implications for the fleet. Issues to be considered when moving to other areas are higher fuel costs, gear conflict, fishing ground may already be in use for another purpose, quota issues; vessels may not have quota available for what can be caught in the area they are displaced to, all of which have to be taken into consideration”.
- 7.22 Displacement for other activities was also addressed by a public sector respondent who commented on potential costs to operations. Again, uncertainty around management measures was not welcomed “Inconsistency in approach and unknown measures that may impact delivery of our project builds or services are of significant concern ... as our customers must bear the financial cost.”
- 7.23 There was a comment that the Sustainability Appraisal is incomplete as economic and environmental displacement effects need to be considered.
- 7.24 Environment/conservation respondents also commented that the value of marine wildlife tourism including seabird tourism has not been considered and that there have been limited efforts to value non-use benefits. Individuals and organisations from several groups said that the Sustainability Appraisal does not account fully for socioeconomic benefits that could arise from the network.
- 7.25 A local authority commented that there seems to be a focus on short term financial loss rather than long term economic and environmental benefits.

- 7.26 Differences in analysis methodology between the Sustainability Appraisal and Strategic Environmental Assessment were also mentioned with one environment/conservation respondent saying that this “does not provide a consistent knowledge base to fully inform the decision-making process”.
- 7.27 Comments from industry/ transport respondents included concern that potential costs of relocation for commercial anchorages have not been considered, although they allowed that most are likely to be minimal. There was also a concern in this sector over a possible loss of investor confidence from potential extra responsibilities, assessments, costs and delays that may result from the designation of a site. A public sector respondent was concerned that costs for additional work that will be required of for example, energy companies, had not been considered saying that “many factors contribute to the sanctioning of a project, including the consideration of development costs in other parts of the world. If development is hindered this could have serious economic impacts on Scotland and the UK”.
- 7.28 There were also comments that the drive to increase salmon farming conflicts with “maintaining a diverse ecosystem and that industry will destroy organisms that make up the biodiversity of the marine environment.”

Summary – Sustainability Appraisal

A large number of campaign respondents said that the Sustainability Appraisal does not fully account for the socioeconomic benefits that could arise from the proposed MPA network.

There were comments, from standard responses, that not all costs and benefits had been included. Some felt it had been based on false assumptions and flawed information in relation to management costs.

Some commented that the Sustainability Appraisal is based on closure or restrictions to fishing and the management options don't always propose such action.

Some commented that the Strategic Environmental Assessment assumes displacement will not occur; this was seen as unrealistic. Others said that the potential effects of displacement of fishing activity have not been robustly considered.

There were also comments that, in relation to the importance of the fishing industry and especially small scale fishing, the Sustainability Appraisal does not understand the specific circumstances of island communities.

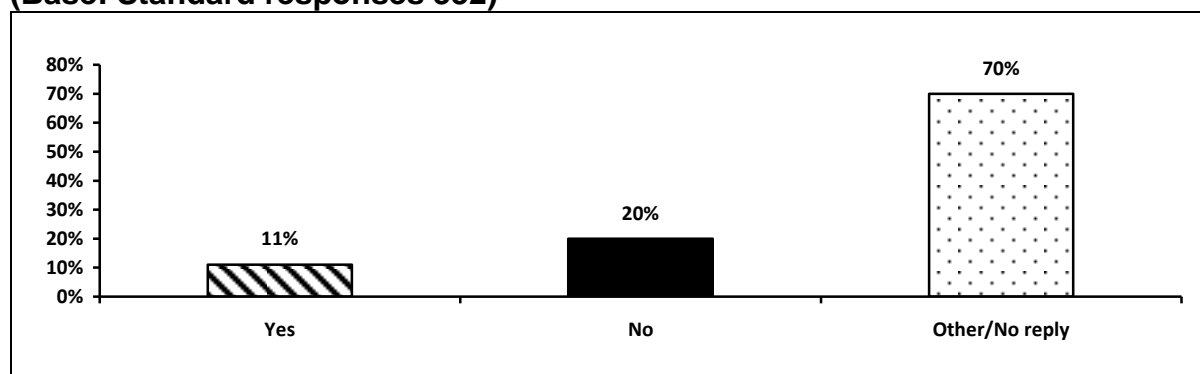
8 AN ECOLOGICALLY COHERENT NETWORK

- 8.1 Respondents were asked: ‘On the basis of your preferences on which pMPAs should be designated, do you view this to form a complete or ecologically coherent network, subject to the completion and recommendations of SNH’s further work on the 4 remaining search locations?’
- 8.2 One-hundred and one standard responses, across respondent groups, contained an answer to this question.
- 8.3 Sixty-six said no; this was made up mainly of individuals and environment/conservation respondents, although a small number from energy, local groups, mobile fishing and other organisations also said no. This figure also includes several of the campaign plus responses.
- 8.4 Thirty-five said yes; this included 18 individuals and organisation responses from a number of respondent groups; no environment/conservation respondents said yes.
- 8.5 It should be noted, however, that while respondents ticked ‘yes’ subsequent commentary indicated that some hold the opposite view; it appears that at least seven of these respondents hold the opposite view. This discrepancy may have been because of the questionnaire design; at previous questions respondents were given a ‘yes’ box to tick if they wished to comment on the question, rather than as a question in its own right
- 8.6 Four of the campaigns (5,529 submissions) included text saying no.

Chart 8.1

Whether forms a complete or ecologically coherent network

(Base: Standard responses 332)



- 8.7 As can be seen in the chart above, over three-quarters of standard respondents did not give an answer. The table below shows the numbers saying that the proposed network will not be ecologically coherent.

Table 8.1**Whether view this to form a complete or ecologically coherent network**

	Number saying No
Even if the best 29 sites and the remaining four search locations become MPAs as I would like, I still do not view this to be an ecologically coherent network. Other species in need of MPA protection - such as spiny lobsters, heart cockle aggregations and burrowing anemones - must be added to future iterations of the network. Further MPAs for common skate and nationally important MPAs for seabirds are also needed. I will only consider the network ecologically coherent when all species and habitats that can benefit from spatial protection are adequately represented and when robust science shows the network supports and enhances the ecological linkages between the different MPAs. (network campaign)	2,615
I do not believe the proposed network to be ecologically coherent. I firmly urge the Scottish Government to extend the MPA proposals to protect vulnerable species excluded from the proposed network. There is already good evidence to support the immediate inclusion of whales, dolphins, basking sharks and nationally important populations of seabirds, such as puffins and kittiwakes. These - and those species already dropped from the proposals; spiny lobsters, heart cockle aggregations, burrowing anemones - must be added to the network. The network will only be ecologically coherent when all species and habitats that can benefit from spatial protection are adequately represented and when sound, properly-resourced science shows it to be based on the ecological linkages between the different MPAs. International recommendations say a network of MPAs must interact and support the wider environment and the Scottish Government has a legal obligation to enhance Scotland's seas. For each MPA, the strongest and most effective management must be in place so that recovery is possible within and beyond the boundaries of the site. Zonal management that puts in place measures to protect only the remaining coverage of species and habitats is not enough, given the context of ecological decline documented by Scotland's Marine Atlas. (network campaign)	662
The network of MPAs as consulted on is not complete and the Scottish Government must commit to creating additional MPAs as soon as possible to protect species including basking shark, minke whale, white-beaked dolphin, Risso's dolphin, common skate and sites for birds at sea. (network campaign)	1,526
The Scottish Government has a legal obligation to achieve good environmental status in Scottish waters by 2020 and must be able to demonstrate a well-managed network of MPAs are in place by the end of 2016. MPAs should be regarded as integral to the achievement of healthy and productive seas and effective ecosystems management. It is not good enough to view them as simply a way of protecting a few 'relic' species and habitats. The Government needs to show that it is managing our seas for the benefit of everyone in Scotland. (South Arran campaign)	726
Standard responses	66
Total	5,595

- 8.8 Most of those who said 'no' commented further and a main theme raised in these responses was the need to protect far more species: "However, these proposed MPAs will only offer direct protection to 39 species and habitats, a tiny proportion of the 6,500 species and many important habitats found in

Scotland's seas. This runs entirely contrary to the OSPAR recommendations which ask that network areas include 'the range of species, habitats and ecological processes (for which MPAs are a suitable measure)''.

- 8.9 The need to include more seabirds featured in responses as did a call for "The inclusion within the network of the full representative range of Scottish marine species and habitats (e.g. addition of non-MPA search features)".
- 8.10 Respondents wanted to see the other four search areas designated as MPAs in addition to those included in this consultation; this would deliver protection for minke whale, white-beaked dolphin, Risso's dolphin and basking shark.
- 8.11 Some of the environment/conservation respondents gave lengthy replies to this question, in which they mentioned many of the points discussed above amongst many other detailed comments and suggestions. These respondents commented on issues around connectivity, size, management measures, additional features and representation amongst many others.
- 8.12 One from this group commented on the need to include finfish and shellfish "Fish species which can be of 'keystone' importance within 'natural' inshore marine ecosystems around Scotland include herring which spawn on the seabed (and which can be an important food for salmon and sea trout), sea trout, salmon and juvenile gadids. None of these were included on the list of MPA search features. Therefore, we do not believe that a 'natural' ecosystem approach has been followed".
- 8.13 There was concern, particularly from mobile fishing respondents, over the amount of replication across the network. These respondents felt that some features had been protected across several sites, or that some features had been designated even though they are not noted as threatened features on the OSPAR list of Threatened/declining Species and Habitats.
- 8.14 A small number of environment/conservation respondents asked whether there would be an opportunity to submit further third-party MPA proposals before the next review of the network in 2018.
- 8.15 Individuals commented on the need to widen protection to other species; many mentioned all seabirds abut others included finfish, whales, dolphins and porpoises.
- 8.16 Fourteen respondents included the answer "NO, because this consultation response form does not include the Skye to Mull search Area".
- 8.17 Several respondents called the proposals 'a step in the right direction'.
- 8.18 Only a small number of the 35 who said 'yes' commented. Some, from the aquaculture group, said they would prefer a reduction in the overall size "The current 'broad brush' approach is inappropriate and needs to be more targeted to ensure the species and features get the protection they need". Individuals and some from recreation/ tourism felt the network should be as large as possible. As mentioned above, commentary in a number of the 'yes' responses indicated that the respondents hold the opposite view.

Summary – Ecological coherence

A large number of campaign respondents said that the network will not be ecologically coherent.

Most were looking for better representation but fishing groups thought there was too much replication.

There was a difference of opinion amongst standard respondents, although a relatively small number commented.

A main concern was that the network should protect more species.

9 OTHER COMMENTS

- 9.1 The final consultation question asked ‘Do you have any other comments on the case for designation, management options, environmental or socioeconomic assessments of the pMPAs, or the network as a whole? ‘.
- 9.2 One hundred and eighteen respondents, including 44 individuals as well as 74 organisations across groups, submitted comments at this question or included letters, reports or other information with their submission; a further 75 individuals submitted a campaign plus response⁵ and 2,615 campaign submissions also included an answer to this question.

The Skye to Mull search area

- 9.3 Fourteen individuals, two local groups and one recreation/ tourism respondent submitted the same or very similar text voicing disappointment that a Skye to Mull MPA was not included in the consultation and asking that the Skye-Mull search area, including Tiree, be designated as a nature conservation Marine Protected Area.

Network campaign

- 9.4 Submissions from one of the large network campaigns (2,615 submissions) included the following text:

The Scottish Government has a legal obligation to enhance Scotland's seas and, according to international recommendations, the MPA network must support the wider marine environment. For each MPA, effective management must therefore be in place so that species and habitat recovery is possible both within and beyond the boundaries of the site. Zonal management that protects only the remnant extent of marine species and habitats, particularly of vulnerable benthic features, is not enough given the context of ecological decline documented in Scotland's Marine Atlas.

Other comments

- 9.5 Many respondents provided background information on their organisation or their involvement with MPA proposals. Several offered additional information or further advice or support. There was appreciation for the work already carried out towards the MPA network by the Scottish Government and its agencies and acknowledgement of the importance of marine conservation.
- 9.6 Many others restated points made at earlier question in relation to specific pMPAs.
- 9.7 Comments from a large number of the individuals related to the need to include seabirds. Many individuals commented on the importance of MPAs.

⁵ Campaign plus responses are described in paragraph 1.18

- 9.8 A wide range of other comments were included in responses and these are summarised below:
- 9.9 Several aquaculture respondents commented on the importance of management options as a starting point for the process of “establishing how current activities and protected species and features interact.”
- 9.10 An academic/ scientific respondent asked that socioeconomic assessments include “consideration of the marine historic environment.”
- 9.11 Energy respondents were concerned and uncertain over the quality and availability of data on the distribution of protected features and on the criteria which will be applied in determining ‘no significant risk’. They also had some concerns over the application of management measures. These respondents pointed out that should particular pMPAs be designated this would mean having to reapply for project consent leading to uncertainty for investors. Some commented “If the UK and Scottish Governments wish to meet the ambitious renewable energy targets this uncertainty requires to be addressed.”
- 9.12 These respondents challenged some of the general principles in the Management Handbook, specifically MPAs integrated with wider marine management and Possible MPA identification uses best scientific information. Respondents felt “‘best available evidence’ could disproportionately affect offshore renewable energy locations which often have higher quality data coverage than the wider marine area.”
- 9.13 These respondents also sought confirmation that existing licences will not be revoked or varied while another from this group asked “if an application is determined prior to MPA designation but construction does not commence until after MPA designation what impact will this have?”
- 9.14 Other comments from the energy group included:
- that it would be inappropriate and misleading to remove the SPA/ SAC/ SSSI/ NC MPA label and refer to all sites as an MPA as Nature Conservation MPAs are not SPAs or SACs and the distinction must be clear.
 - the need for “further analysis quantifying the potential socioeconomic costs of individual proposed designations and the proposed network as a whole specifically with regard to the potential effects on project delay, restrictions or failure to proceed.”
 - the need for guidance on how to assess potential impacts and on what style assessment will be expected.
- 9.15 Many of the environment/conservation respondents commented and the main themes covered by these responses were:
- The need to protect fish stocks in the Clyde.
 - That the MPA networks must be fully integrated with the National Marine Plan.
 - The need to designate MPAs for seabirds.

- The need to ensure decisions are made in close consultation with local communities.
 - The need to consider how undesignated geodiversity interests will be addressed and consideration of the management of geodiversity interests inshore.
 - The need for assessment of the costs of not designating an MPA.
 - A balanced socioeconomic assessment that includes the benefits of other sectors such as eco-tourism.
 - For overall population status to be considered when setting objectives.
 - That a precautionary approach should be taken when the condition of a feature is unknown.
 - That the conserve objective should only be used in cases where a protected feature is in a good condition.
 - Clarity on the progress of Research and Demonstration MPAs.
 - The need for collecting baseline data for various species and for better fisheries data to inform consultations with the various sectors in the fishing industry.
 - Some voiced support for MPA site management measures to be statutory.
 - The need for buffer zones.
 - That SACs should remain distinct from MPAs.
- 9.16 Respondents from industry and transport commented on the need to better understand how the network, including SPAs, SACs and SSSIs, and management measures will work in practice and how any changes will be consulted on.
- 9.17 A respondent from the international fisheries group said Scotland should follow the procedure adopted by Spain when dealing with EU community waters; proposing to the Commission that measures to protect the marine environment are taken up in the common fisheries regulations. This respondent also commented on possible effects on other areas should the Spanish fleet be displaced.
- 9.18 Local authority respondents raised the need for further consideration of local impacts and submitted a number of specific concerns about particular areas.
- 9.19 The respondents from the mobile fishing group submitted lengthy and detailed responses containing objections and concerns both over the proposals and the uncertainty caused by unknown consequences of the MPA proposals. One said: “It is unfair to ask any commercial organisation or business to agree and sign up to MPAs without first knowing definitively, how this will affect their activities”.
- 9.20 There were again comments that the data and scientific evidence used in the proposals is flawed; one of this group said “Until such time as credible, scientific, peer reviewed evidence is available it will be impossible to make such judgements.” There was also concern that evidence for designation of the MPAs has not been science-led.

- 9.21 There were requests for more details on what management measures will actually mean for the fishing vessels and who will make final decisions about what level of reduction will be required in each area.
- 9.22 Respondents stressed the need to include and involve local people in any discussions and decisions and there were again comments on the importance of the fishing industry to the island and other local communities.
- 9.23 A number of respondents commented that many of the features which will be protected by the various pMPAs are already protected by other legislation. There were also comments that many of the features do not qualify under the OSPAR threatened/declining definitions.
- 9.24 One respondent said they acknowledged that “designation of an MPA by itself does not affect fishing but the control measures which are being suggested by Scottish Natural Heritage and the Joint Nature Conservation Committee will substantially, and quite unnecessarily, reduce fishing in Scotland’s Seas endangering, at one and the same time, employment and well-being, in coastal Scotland and the Country’s food security.”
- 9.25 An academic respondent asked that socioeconomic assessments include consideration of the marine historic environment.
- 9.26 There was welcome for the opportunity to respond to the consultation from an ‘other’ organisation that commented on the importance of an ecologically coherent network of Marine Protected Area to enhance and protect the marine environment. This respondent was keen to see protection for some other species and commented on one in particular: “Whilst we recognise that none of the proposed MPAs will be specifically designated for Atlantic salmon or sea trout, we believe that there will be additional benefits to these species during the marine phase of their life cycle. We also believe that following designation, and where appropriate, consideration should be given to introducing management measures for these species (which are in themselves are Priority Marine Features)”. Another organisation from this group commented: “The value of protecting seabed habitats for fisheries management purposes needs to be better understood.”
- 9.27 Public bodies welcomed the consultation and said that decisions need to be made on the best available evidence. This group said that management options need to be practical, proportionate and should deliver their objectives “without overburdening current and future users of the marine environment”. There were calls for individual BRAs for each site and some specific points were made about work that has already been carried out in these areas that may need taken into account, for example in improvements to water quality.
- 9.28 There was comment on the need to continue to work with other countries where MPAs are near territorial borders.
- 9.29 There was a small amount of concern from the recreation/ tourism group, mostly that measures may limit some activities and therefore tourism, for example anchoring or mooring restrictions. This group commented on the importance of tourism to the fragile economies of rural and island communities.

9.30 Respondents from the static fishing group were optimistic about the success of the network; there was also a comment on the need for spatial limits for mobile fishing.

APPENDICES

APPENDIX 1: CONSULTATION QUESTIONS

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

Individual possible Nature Conservation MPAs

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

17. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **North-west sea lochs and Summer Isles** possible Nature Conservation MPA?
18. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **Noss Head** possible Nature Conservation MPA?
19. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **Papa Westray** possible Nature Conservation MPA?
20. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **Rosemary Bank Seamount** possible Nature Conservation MPA?
21. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **Small Isles** possible Nature Conservation MPA?
22. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **South Arran** possible Nature Conservation MPA?
23. Do you have any comments on the case for designation, management options and socioeconomic assessment for **The Barra Fan and Hebrides Terrace Seamount** possible Nature Conservation MPA?
24. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **Turbot Bank** possible Nature Conservation MPA?
25. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **Upper Loch Fyne and Loch Goil** possible Nature Conservation MPA?
26. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **West Shetland Shelf (formerly Windsock)** possible Nature Conservation MPA?
27. Do you have any comments on the case for designation, management options and socioeconomic assessment for the **Wyre and Rousay Sounds** possible Nature Conservation MPA?

Choices to represent features in the MPA Network

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

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

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

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

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

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

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

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

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

Sustainability Appraisal

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

Final Thoughts

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

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

APPENDIX 2: LIST OF ORGANISATIONS

Aberdeen Council City
Aberdeenshire Council
Aggregate Industries UK Ltd
Animal Concern
Argyll and Bute Council
Arran Natural History Society - Bird Recorder
Arran Natural History Society
Arran Trust
Arran Wild Walks
Association of Salmon Fishery Boards
Ayr Sea Angling Club
Banff and Macduff Community Council
Basking Shark Scotland
Beatrice Offshore Wind Ltd
British Ports Association
British Sub Aqua Club
City of Edinburgh Council
Clyde Fishermen's Association
CNPMEM (French National Committee for Marine Fisheries and Sea Farming)
COAST (Community of Arran Seabed Trust)
Comhairle nan Eilean Siar
Comite Regional des peches maritimes et des elevages marins de Bretagne
COSLA (Convention of Scottish Local Authorities)
DECC Offshore Oil & Gas Environmental Department.
Dumfries and Galloway Council
East Grampian Coastal Partnership
EDF Energy
EDPR-UK
Fair Isle Marine Environment & Tourism Initiative
Forth Estuary Forum
Forth Ports Limited
G.B.B. Estates Ltd
HIE (Highlands and Islands Enterprise)
Highland Holidays
Inshore Fisheries Groups (IFG) - National Liaison Officer
IfA (Institute for Archaeologists)
Isle of Man Government
John Muir Trust
Kintyre Waters Static Gear FA
Knoydart Foundation
Kyle Rhea Community
Les Pecheurs de Bretagne
Loch Lommond and Trossachs National Park
Mallaig & North West Fishermen's Association Ltd

Marine Concern
Marine Conservation Society
Marine Harvest (Scotland) Limited
Marine Spatial Planning Section, NAFC Marine Centre
Monk Castles Associates
Mull Aquaculture and Fisheries Association
Mull Fishermen's Association
National Grid
National Trust For Scotland
Natural Power
No Tiree Array
North Ayrshire Council
North Berwick Community Council
North West Scotland Inshore Fisheries Group
Northern Ireland Fish Producers Organisation
Northern Lighthouse Board
Oil & Gas UK
Orkney Fisheries Association
Orkney Islands Council
Orkney Trout Fishing Association
OHIFG (Outer Hebrides Inshore Fisheries Group)
Pentland Firth Yacht Club
Ross Sutherland Skye & Lochalsh Fishermen's Association
Royal Yachting Association Scotland
RSPB Scotland
Scottish Creel Fishermen's Federation
Scottish Enterprise
Scottish Environment Link
SEPA (Scottish Environment Protection Agency)
Scottish Fishermen's Federation
Scottish Geodiversity Forum
Scottish Power
Scottish Renewables
Scottish Salmon Producers' Organisation
SSDA (Scottish Scallop Divers Association)
Scottish Seabird Centre
Scottish Water
Scottish Wildlife Trust
Sea-changers
SeaFish Industry Authority
Seafood Shetland
Seagreen Wind Energy Limited
Secretaria General de Pesca Espana
Shetland Fishermen's Association
Shetland Islands Council
Skye Fisheries Trust
Sleat Community Council

South Ayrshire Council
South West Inshore Fisheries Group
SSE
SIFT (Sustainable Inshore Fisheries Trust)
SWFPA (Scottish White Fish Producers Association)
Tayside Biodiversity Partnership
The Crown Estate
The Highland Council
The Scottish Salmon Company
The Scottish Sea Angling Conservation Network
The Wildlife Trusts
Tobermory Harbour Association
UK Chamber of Shipping
UAPF (Union des Armateurs a la Peche de France)
University of Aberdeen MSc Applied Marine and Fisheries Science students
Wee Silverburn Holiday Cottage
Wester Ross Area Salmon Fishery Board
Wester Ross Fisheries Ltd.
Wester Ross Fisheries Trust
Western Isles Fishermen's Association
Whale and Dolphin Conservation
Whiting Bay & District Improvements Association
Wigtown Community Council
WSFPO (West of Scotland Fish Producers' Organisation)
Wyre Community Association

216 individuals

APPENDIX 3: POSSIBLE MARINE PROTECTED AREAS

OSPAR Region(s)	Possible MPA /MPA search location (asterisked)	Territorial / Offshore
I	Faroe-Shetland sponge belt	Offshore
I & II	North-east Faroe Shetland Channel	Offshore
II	Central Fladen	Offshore
	East Caithness Cliffs	Territorial
	East of Gannet and Montrose Fields	Offshore
	Fetlar to Haroldswick	Territorial
	Firth of Forth Banks Complex	Offshore
	Mousa to Boddam	Territorial
	North-west Orkney	Both
	Norwegian boundary sediment plain	Offshore
	Noss Head	Territorial
	Papa Westray	Territorial
	South-east Fladen	Offshore
	Southern Trench*	Territorial
	Turbot Bank	Offshore
	Western Fladen	Offshore
Wyre and Rousay Sounds	Territorial	
II & III	West Shetland Shelf (formerly Windsock)	Offshore
III	Clyde Sea Sill	Territorial
	Eye Peninsula to Butt of Lewis*	Territorial
	Loch Creran	Territorial
	Lochs Duich, Long and Alsh	Territorial
	Loch Sunart	Territorial
	Loch Sunart to the Sound of Jura	Territorial
	Loch Sween	Territorial
	Monach Isles	Territorial
	North-west sea lochs and Summer Isles	Territorial
	Shiant East Bank*	Territorial
	Skye to Mull*	Territorial
	Small Isles	Territorial
	South Arran	Territorial
Upper Loch Fyne and Loch Goil	Territorial	
III & V	Geike Slide and Hebridean Slope	Offshore
	South-west Sula Sgeir and Hebridean Slope	Offshore
	The Barra Fan and Hebrides Terrace Seamount	Offshore
V	Hatton-Rockall Basin	Offshore
	Rosemary Bank Seamount	Offshore



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