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**From:** Seaprobe Atlantis <seaprobe@msn.com>  
**Sent:** 20 June 2011 07:41  
**To:** Seal Haul-Out Consultation mailbox  
**Subject:** seal haul out sites.

Dear Sir / Madam

With reference to the current consultation on seal haul out sites.

I operate a wildlife watching business from Kyle of Lochalsh. My business was established in 1998, we operate trips throughout the day 214 days each year. We do approximately 1,500 trips each year to see the local seal populations. In total we have spent around 18,000 hours observing seals daily over the past 14 years.

With reference our local seal haul out sites. There are four main areas used by the Lochalsh seals on a daily basis from April - October depending on wind direction and weather conditions. two of these areas one on the East side of the Skye bridge and one on the West side of the Skye bridge are used for pupping.

The pups born on these sites use these sites to haul out on after they are weened and continue to use them as they grow eventually having their own pups on the same site. The seals we observe in Kyle are the descendants of a long line of seals that have been using the same haul out going back generations.

Back in 1990, on Skye near Broadford, Highland Fish Farmers shot every seal on a haul out site, adjacent to their farm, to this day that haul out has remained empty.

If seals are shot in one area, seals don't come in from other areas to fill the space.

They are familiar with their local surroundings and stick with what they know.

The main haul out site in Kyle, is favoured for pupping as it has a smooth rock surface, with a nice gentle gradient making it easier for pups to get in and out of the water, should the need arise.

This site is not included for protection, but due to it's proximity to a salmon farm has been subject to several incidents of mass shooting. And in recent years has experienced regular disturbance from Sea Kayaks.

On May 31st this year, a seal had a pup. Unfortunatley this coincided with 3 kayaks paddling through the haul out area, after the seals had stampeded into the water, they went off and did not return for the rest of the day, this is normal behaviour. On this occassion the new born pup was abandoned and the mother did not return, as the day progressed the greater black backed gulls attacked the pup, by the end of the day it was dead. The 3 kayakers paddled on oblivious to the destruction left behind them. Kayaking in Lochalsh is becoming more prevelant and instances of disturbance are becoming daily occurances. These sites are the sites that seals use to pup, they can't just conjure up another more remote rock to sit on!

Left undisturbed seals will sit for 16 hours a day, the Lochalsh seals only hunt at night. The only time they go ithe water is when they are disturbed or when it is pouring with rain.

The Lochalsh sites should be afforded protection because they are at the most risk of harrassment and of being shot. A site chosen for protection not to far from Lochalsh, is in a remote area with little risk of harrassment and doesn't actually need any protection. The logic does not make a lot of sense to me.

I understand that virtuallky all the sites on the west coast that lie near salmon farms are left off the list, these are the sites under most threat, surly these are the sits that need protecting.

# Consultation on Seal Haul-Out Sites



## RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

### 1. Name/Organisation

Organisation Name

Seaprobe Atlantis

Title Mr  Ms  Mrs  Miss  Dr  *Please tick as appropriate*

Surname

Smith

Forename

Nigel

### 2. Postal Address

4 upper breakish

Isle of Skye

IV42 8PY

Phone 01471822716

Email seaprobe@msn.com

### 3. Permissions - I am responding as...

Individual

/ Group/Organisation

*Please tick as appropriate*

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

*Please tick as appropriate*  Yes  No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

*Please tick ONE of the following boxes*

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

*Please tick as appropriate* xxx  Yes  No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

*Please tick as appropriate* xxx  Yes  No

## CONSULTATION QUESTIONS

### General questions

Question 1: Do you consider that the overall number of seal haul out sites proposed at national/regional/local level represent a reasonable balance between seal conservation and other sustainable activities around the Scottish coastline?

Comments No, a large number of sites not included are in the areas most affected by disturbance. In my local area – Lochalsh, none of the important sites are included.

Question 2:

Do you consider that additional sites should be included at national/regional/local level and, if so, why, how many additional sites and which sites?

Comments yes, the most threatened sites are those closest to salmon farms, all these sites should be included. In Kyle of Lochalsh, the main haul out site is 1.25 miles from a salmon farm, 20% of these seals were shot in 2004, a number were shot in 2008, two were shot 2010. This site is also subject to harassment from Kayaks, one pup separated from its mother due to kayaks paddling up to the haul out this summer, was abandoned & subsequently died. This site is the main pupping area in Lochalsh, it's not included but should be.

Question 3: Do you consider that fewer

sites should be included at national/ regional/local level and, if so, why, how many fewer sites and which sites?

Comments. no

Question 4:

Do you agree that existing Special Areas of Conservation for seals should be added to the list of seal haul out sites being considered for possible designation?

Comments yes

Question 5:

Do you consider that particular national or regional level activities might represent a potential risk of harassment to seals on haul out sites in general?

Comments. yes

Question 6:

Do you consider that particular local activities might represent a potential risk of harassment to seals on particular haul out sites included on the list?

Comments. Yes,

Question 7:

Do you have any views on whether the boundaries of particular haul out sites included on the list might be revised ?

Comments. All haul out sites should be protected

Equality

assessment

The Scottish Government must ensure that any policies that it implements do not unduly discriminate against persons defined by age, gender, disability, sexual orientation, race and religion and belief. We would welcome your views on whether you believe that any of the propositions set out in this consultation paper will unduly impact on any of these groups mentioned.

Comments. ?