

Meeting with Cabinet Secretaries to discuss the submission for inshore MPAs

25 November 2025 by Teams

Present: Ms Martin, Ms Gougeon, **[Redacted under reg 11(2)]**

MD Officials: Caro Cowan, **[Redacted under reg 11(2)]**

MD officials gave a presentation setting out

- documents we were asking them to approve and sign
- sites which may be contentious with various stakeholders
- technical issues to delivery that may delay the consultation launch date
- risks of delaying the consultation launch – with increasing policy **[Redacted under reg 10(4)(e)]** risk with a longer delay

Ms Martin expressed concern around

- The available ornithology resource to complete the fisheries assessments for SPAs within the time frame required
- Sufficient resource to deliver the maps for the publications and the online consultation portal
- Capacity of MD to deliver all documents required alongside the amendments to the Natural Environment Bill
- Going out to consultation if we are not fully prepared as this could undermine confidence in the process

Ms Martin highlighted she had concerns about launching the consultation if it was not ready, it must be robust and there must be confidence in it from all stakeholders. She also highlighted because of the complexity of the consultation it should not be shortened from the 16 weeks, which had already been committed to publicly.

Ms Gougeon had similar concerns but also

- There was a significant number of consultations in Q3 and Q4 before the end of Parliament which could overwhelm stakeholder capacity to respond.
- She also wanted time to review the ICIA in detail and questioned whether there should be a full ICIA rather than a partial one.
- **Redacted under reg 10(4)(e)]**

Ms Martin requested a further SITREP on the issues around capacity and mapping in order to enable her to take a robust decision.

**ACTION:** Officials agreed to urgently provide the SITREP.

From: **[Redacted under reg 11(2)]@gov.scot** On Behalf Of Cabinet Secretary for Climate Action and Energy

Sent: 04 November 2025 16:49

To: **[Redacted under reg 11(2)]@gov.scot**; Cabinet Secretary for Climate Action and Energy <CabSecforCAE@gov.scot>; Cabinet Secretary for Rural Affairs, Land Reform & Islands 2024 <CabSecforRALRI@gov.scot>

Cc: Director of Marine <directormarine@gov.scot>; Director of Offshore Wind <DirectorOSW@gov.scot>; Caroline Cowan <Caroline.Cowan@gov.scot>; Nuala Gormley <Nuala.Gormley@gov.scot>; Elisabeth Campbell <Elisabeth.Campbell@gov.scot>; Malcolm Pentland <Malcolm.Pentland@gov.scot>; Mike Palmer <Mike.Palmer@gov.scot>; Rebecca Hackett <Rebecca.Hackett2@gov.scot>; Lucy Law <Lucy.Law@gov.scot>; Annabel Turpie <Annabel.Turpie@gov.scot>; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**

Subject: RE: Update on reprioritisation of ornithology resource and implications for the Inshore MPA consultation, MD LOT Consenting and Offshore Wind

This email is for the official record and confirms a Ministerial Decision. This email must be placed in the official record (eRDM) by your team in line with SG records management policy.

Thanks v much **[Redacted under reg 11(2)]** Cab Sec has noted.

**[Redacted under reg 11(2)]** (she/her)

Private Secretary to the Cabinet Secretary for Climate Action and Energy – Gillian Martin MSP

Scottish Government | St Andrews House Edinburgh EH1 3DG | **[Redacted under reg 11(2)]** | CabSecforCAE@gov.scot

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From: **[Redacted under reg 11(2)]@gov.scot**

Sent: 30 October 2025 17:48

To: Cabinet Secretary for Climate Action and Energy <CabSecforCAE@gov.scot>; Cabinet Secretary for Rural Affairs, Land Reform & Islands 2024 <CabSecforRALRI@gov.scot>

Cc: Director of Marine <directormarine@gov.scot>; Director of Offshore Wind <DirectorOSW@gov.scot>; Caroline Cowan <Caroline.Cowan@gov.scot>; Nuala Gormley <Nuala.Gormley@gov.scot>; Elisabeth Campbell <Elisabeth.Campbell@gov.scot>; Malcolm Pentland <Malcolm.Pentland@gov.scot>;

Mike Palmer <Mike.Palmer@gov.scot>; Rebecca Hackett <Rebecca.Hackett2@gov.scot>; Lucy Law <Lucy.Law@gov.scot>; Annabel Turpie <Annabel.Turpie@gov.scot>; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**; **[Redacted under reg 11(2)]@gov.scot**

Subject: Update on reprioritisation of ornithology resource and implications for the Inshore MPA consultation, MD LOT Consenting and Offshore Wind

Dear Cab Secs/POs

On the 9 October 2025 we submitted an urgent note on the reprioritisation of ornithology resource following a significant delivery issue from an external contractor providing the inshore MPAs fisheries assessments. In that note we committed to giving regular updates on the ongoing impact on other work areas, including consenting by MD-LOT and OWD workstreams including the Sectoral Marine Plan (SMP); sourcing of additional external ornithology resources and the ongoing timeline for the Inshore MPA and PMF consultation.

Sourcing of external ornithology resource

As highlighted to Ms Martin on the 21 October 2025 (meeting with Offshore Wind Director and Head of MD-LOT) Marine Directorate has been successful in securing 2 ornithologists from the Joint Nature Conservation Committee (JNCC) (3 days a week for 6 weeks) to support the finalisation of the Fisheries Assessment for Special Protection Areas (SPA) for Seabirds. They started working immediately, as they are already familiar with the HRA process, and this has reduced the overall requirement for support from internal Marine Directorate ornithologists. In terms of prioritising internal and external resources we are currently focussing completing the fisheries assessments, as quickly as possible, with a current likely completion date of the week ending 14 November 2025, so internal resource (currently 2 x B2 and 1 x B3) can then be freed up for other priorities. However, this will be reassessed if other priority issues are identified requiring urgent input within this timeframe.

Impact on other work areas

**[Redacted – Out of Scope]**

Timeline for the launch of the Inshore MPA and PMF public consultation

Whilst we have yet to set a date for the launch of the public consultation on inshore MPA and PMF fisheries management measures the Cabinet Secretary has publicly committed to launching it before the end of November with a 16 week duration. With the delays caused by contractor delivery issues it is currently unlikely that we will be able to launch the consultation before the end of November, however all efforts are being made to avoid further slippage. The current proposal, which has been discussed with Spads, would be to launch before the 12 December, whilst

maintaining at 16 week consultation and front loading the public engagement sessions into January and February to avoid the pre-election period. Whilst the end of the consultation would overlap with start of the pre-election period it would be compliant with current guidance, as long as no public events were held during this time. It would also avoid shortening the consultation period which stakeholder have specifically asked to be extended to 16 weeks. A full submission is currently being drafted seeking approval to consult and this will include an update on the specific launch date.

Best regards,

**[Redacted under reg 11(2)]**

**[Redacted under reg 11(2)]**, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

M: **[Redacted under reg 11(2)]**

E: **[Redacted under reg 11(2)]**@gov.scot

# Delivery of the Inshore MPA and PMF Fisheries Management Measures Public Consultation – Situation Update

Wednesday 26 November 2025

At the meeting to discuss the Submission on the public consultation for Inshore MPAs and PMFs fisheries management measures, on 25 November 2025, Ms Martin asked for an update on the current delivery situation and the potential implications, this is outlined below.

## **Delivery Issues**

### 1) Mapping

We are behind schedule in delivering the final publication level fisheries measures options maps due to capacity issues within the MD GIS team and complexity of the maps to address overlapping sites. These are needed for both the High-level Site Summary document, Fisheries Assessments, Site Proposal document and Citizenspace online consultation portal. A significant proportion of the maps have already been produced with the remaining expected to be provided by this Friday 28 Nov. It is expected it will take a further week to update the remaining documents and online portal and a further week for quality assurance checks and finalisation. The High-level site summary document will be prioritised so a complete version can be available for Ministers as soon as possible. We have high confidence in this timeline.

### 2) Fisheries Assessments

For Nature Conservation MPAs (NCMPAs) and Special areas of Conservation (SACs) the fisheries assessments are substantially complete and require the addition of finalised measures options maps and quality assurance checks. For Special Protection Areas for Seabirds (SPAs) these assessments are still being finalised and need additional specialist input. We expect the technical ornithology input to be completed by early next week. A further two weeks will be needed to finalise the policy input and for quality assurance checks so we would expect to finish this work by the 15th Dec. Due to quality of the work provided by the consultants and the ongoing technical work we only have moderate confidence in this timeline.

## **Overall Timeline**

The outcome of these delivery issues is we can no longer meet the proposed public consultation launch date of Wednesday 10 December 2025, as set out in the submission from the 18<sup>th</sup> November. The new proposed launch date would be Wednesday 17 December 2025. This means that the 16 week consultation would end on Wednesday 8 April 2026, overlapping the pre-election period by approximately 2 weeks.

Any further delays to the timeline would require the public consultation to be delayed beyond the festive period meaning it would not be possible to undertake a 16 week consultation before the pre-election period.

## **Risks associated with the delayed launch date**

With a consultation launch date of Wednesday 17 December, the main risk is that the public consultation period overlaps further into pre-election period. Also any further delays would require the consultation to be shortened to 12 weeks to avoid pre-election period, incurring significant negative stakeholder reaction. It would also have an impact on team wellbeing as

they have put a significant effort into preparing the consultation documents, for what is a large and complex consultation, and there would only have a limited break before going into an intensive public consultation. Particularly as public events would need to be undertaken in January and February to avoid the pre-election period.

Any longer delay in the consultation launch would incur significant negative stakeholder reaction from eNGOs and would likely result in requests to release the draft fisheries management measures through EIR/FOI, as we had from PMF fisheries management measures. Implementing the inshore MPA measures as soon as possible is also part of our response to ESS in relation to their investigation into benthic habitats and the UK Marine Strategy.

**[Redacted under Reg 10(4)(e)]**

### **Stakeholder Communications**

As you have previously publicly stated that the aim was to launch the public consultation before the end of November all stakeholders are expecting the consultation to be launched imminently. We have already been questioned in various fora in relation to the expected launch date. Our current response is that we are working as quickly as possible but that it is large and complex project. However, we would expect to receive ministerial correspondence and parliamentary questions if we do not provide an update shortly.

From: **[Redacted under reg 11(2)]@gov.scot**  
Sent: 10 October 2025 17:07  
To: Cabinet Secretary for Climate Action and Energy <CabSecforCAE@gov.scot>;  
Cabinet Secretary for Rural Affairs, Land Reform & Islands 2024  
<CabSecforRALRI@gov.scot>  
Cc: Deputy First Minister and Cabinet Secretary for Economy & Gaelic  
<DFMCSEG@gov.scot>; Director of Marine <directormarine@gov.scot>; Director of  
Offshore Wind <DirectorOSW@gov.scot>; Caroline Cowan  
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**[Redacted under reg 11(2)]@gov.scot**  
Subject: RE: Urgent note on reprioritisation of ornithology resource and implications  
for the Inshore MPA consultation, MD LOT Consenting and Offshore Wind

Hi **[Redacted under reg 11(2)]**,

In answer to the Cab Secs questions below:

We have tried to be as creative as possible to avoid internal reprioritising of resources. Given the short timeframe we need people with both ornithology skills and Habitats Regulations Assessment (HRA) skills who can start working immediately. Hence why we have sought support from our statutory nature advisors, where there is no conflict of interest. Academics would be unlikely to have the skill sets needed and would need training, taking time away from delivery in the short term. We are also still exploring with JNCC if they can give us more support, which would free up internal resource.

**[Redacted under reg 10(4)(e)]**. Continuing efforts have been made to get them back on track, including Iain Wallace and myself meeting with their Managing Directors, but we are still having quality and delivery issues. However we will be reviewing the procurement process following the closure of the contract to see if there are any lessons to be learned.

Also as consenting is within Marine Directorate Iain Wallace would be happy to also attend a meeting with the Cab Sec and Director of Offshore Wind as proposed.

Cheers

**[Redacted under reg 11(2)]**

From: **[Redacted under reg 11(2)]@gov.scot** On Behalf Of Cabinet Secretary for  
Climate Action and Energy  
Sent: 10 October 2025 12:40

To: **[Redacted under reg 11(2)]@gov.scot**>; Cabinet Secretary for Climate Action and Energy <CabSecforCAE@gov.scot>; Cabinet Secretary for Rural Affairs, Land Reform & Islands 2024 <CabSecforRALRI@gov.scot>  
Cc: Deputy First Minister and Cabinet Secretary for Economy & Gaelic <DFMCSEG@gov.scot>; Director of Marine <directormarine@gov.scot>; Director of Offshore Wind <DirectorOSW@gov.scot>; Caroline Cowan <Caroline.Cowan@gov.scot>; Nuala Gormley <Nuala.Gormley@gov.scot>; Elisabeth Campbell <Elisabeth.Campbell@gov.scot>; Malcolm Pentland <Malcolm.Pentland@gov.scot>; Mike Palmer <Mike.Palmer@gov.scot>; Rebecca Hackett <Rebecca.Hackett2@gov.scot>; Lucy Law <Lucy.Law@gov.scot>; Annabel Turpie <Annabel.Turpie@gov.scot>; **[Redacted under reg 11(2)]@gov.scot**>; **[Redacted under reg 11(2)]@gov.scot**>; **[Redacted under reg 11(2)]@gov.scot**>; **[Redacted under reg 11(2)]@gov.scot**>; **[Redacted under reg 11(2)]@gov.scot**>; **[Redacted under reg 11(2)]@gov.scot**>; **[Redacted under reg 11(2)]@gov.scot**>; **[Redacted under reg 11(2)]@gov.scot**>  
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Thanks v much **[Redacted under reg 11(2)]**. **[Redacted – Out of Scope]**. She notes she appreciates the work being done to bring in personnel from other areas of government and wonders if there's a temporary solution in seconding from our academic institutions to assist? She asks we think creatively here.

Going forward she would like to know what we are planning to contract in more reliable services in this area.

Thanks v much

**[Redacted under reg 11(2)]**

Private Secretary to the Cabinet Secretary for Climate Action and Energy – Gillian Martin MSP

Scottish Government | St Andrews House Edinburgh EH1 3DG | **[Redacted under reg 11(2)]** | CabSecforCAE@gov.scot

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From: **[Redacted under reg 11(2)]@gov.scot**>

Sent: 09 October 2025 15:12

To: Cabinet Secretary for Climate Action and Energy <CabSecforCAE@gov.scot>;  
Cabinet Secretary for Rural Affairs, Land Reform & Islands 2024  
<CabSecforRALRI@gov.scot>

Cc: Deputy First Minister and Cabinet Secretary for Economy & Gaelic  
<DFMCSEG@gov.scot>; Director of Marine <directormarine@gov.scot>; Director of  
Offshore Wind <DirectorOSW@gov.scot>; Caroline Cowan  
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**[Redacted under reg 11(2)]@gov.scot**

Subject: Urgent note on reprioritisation of ornithology resource and implications for  
the Inshore MPA consultation, MD LOT Consenting and Offshore Wind

Dear Cabinet Secretaries,

Please find attached an urgent note outlining a significant reprioritisation issue  
regarding ornithology resource within the Marine Directorate. This has direct  
implications for delivery across inshore MPAs, the Sectoral Marine Plan for Offshore  
Wind, and MD LOT consenting work.

Due to the failure of an external contractor to deliver inshore MPA fisheries  
assessments of sufficient quality in the contractually agreed timeframe, we are  
proposing reallocating internal ornithology resource to support inshore MPAs. This  
will have knock-on impacts on offshore wind work including Consenting and the  
Sectoral Marine Plan.

We are seeking your confirmation that you are content to proceed as outlined in the  
attached note, and will continue to keep you updated on progress and further  
mitigations.

Best regards,

**[Redacted under reg 11(2)]**

**[Redacted under reg 11(2)]**, Marine Directorate

Scottish Government, Victoria Quay, Edinburgh EH6 6QQ

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E: **[Redacted under reg 11(2)]@gov.scot**