



A STRATEGY FOR MARINE NATURE CONSERVATION IN SCOTLAND DRAFT MARCH 2010

Response from COAST (Community of Arran Seabed Trust) to the consultation on the Draft Report

COAST is pleased that a Strategy for Marine Nature Conservation in Scotland is being established. A critical reading and discussion of the draft document has highlighted some concerns, which are illustrated in the response below. COAST wishes to contribute to a future that safeguards the marine diversity and indeed protects areas which have been decimated in the last 20 years by overfishing and the rush to aquaculture. What is of vital importance is the inclusion of all sectors- from communities, sea anglers, static fishermen, divers, yachtsmen and other minority marine activities in this strategy discussion, and not just the major power brokers.

12. page 7 Domestic Legislation. Biodiversity action plans require Domestic Legislation to have a much wider focus on nursery beds- such as maerl and eel grass which afford protection and nutrients to many juvenile fish species and invertebrates. Too little attention has been given to these nursery beds, often degraded by dredging, leaving such beds decimated of all life.

14. page 8 Natura Sites The need for additional Natura Sites for inshore waters habitat conservation is an important issue, if Scotland is to actively manage the sustainability and rejuvenation of exploited marine environments.

15. page 8. Nature Conservation MPAs. Whilst this section appears promising, it could be interpreted that it will only be Natura sites which are changed in name to MPAs. This would be totally inadequate for Scotland.

16. page 8 Demonstration/Research MPAs. Clearly a sound strategy, although the language implies it is only a possibility, since the language is conditional. This needs to become a definite part of the overall strategy. This would be an ideal classification for an MPA in Lamlash Bay, to enable over several years demonstration and research of changes in the biodiversity as the result of protection of the wider bay in addition to the No Take Zone already designated under fisheries legislation in 2008.

Figure 2. page 10. Notable absence of designated MPAs in the Firth of Clyde with the exception of Ailsa Craig (existing SPA). Further nowhere in the document is Lamlash Bay No Take Zone illustrated or discussed. What will be the strategy for the formation of No Take Zones in the future?

Page 11. Objectives. Good overarching objectives, although there are concerns that certain measures suggested here will just delay **indefinitely** proper protection of sensitive sites, even though research elsewhere has clearly indicated the need for protection. A particular example:

**vii. To reduce reliance on the precautionary principle by improving the science
And data on which we depend when taking decisions.**

19. page 12. Good Environmental Status. Under EU Directive, this is due to be defined for marine waters by 2012. There is a lack of information about how this will be defined for Scottish waters.

20. page 13. Initial processes that marine Scotland will undertake

• Identification of priority features in Scottish waters by summer 2010

Will this involve community marine stakeholders, such as COAST, sea anglers, static fishermen as well as the major power brokers?

Local Level

35. page 17.

-The powers in the Marine (Scotland) Act could also be used for designation of sites for demonstration and research purposes and to recognise sites nominated by third parties, including those considered to be of biodiversity importance.

Do community marine stakeholders such as COAST, sea anglers, wild salmon interests, static fishermen count as third parties? The language of this paragraph suggests that other higher order "priorities" can always be used to overrule designations.

37.

-The list of species that receive legal protection are subject to regular review on a five-yearly basis and SNH and JNCC are currently undertaking a review of whether any further species merit additional protection.

It is clear that whilst widespread research is not always available local communities have historic and visual evidence of the importance of nursery beds. Will this be considered?

38. page 18. Priority Marine Features

SNH and JNCC are reviewing the marine features on these and related lists of habitats in order to develop a list of priority marine features

It is clear that whilst widespread research is not always available local communities have historic and visual evidence of the importance of certain marine features in their localities. Will this be considered?

44. page 19. The precautionary principle

This codified principle in a number of the EU directives is extremely important in protecting sensitive areas and species, before any research is completed. It would be extremely detrimental to the Scottish marine environment if this principle is downgraded in any way, or is viewed as "regressive to economic progress". The environmental services of inshore waters is only just being realised and has yet to be judged in modern social and economic value considerations. Downgrading of the importance of the precautionary principle would be retrograde for Scotland.

49. page 20. The Scottish Government is also funding research on the value of our marine ecosystems and the scale and importance of wildlife tourism.

COAST and the Isle of Arran is able to supply considerable research in this area. The Clyde sea angling community recently showed the value in jobs and money that sea angling brought to the Clyde prior to the collapse of the fisheries due to unsustainable fishing practices.

50. page 20. Marine conservation MPAs

ix. To involve relevant stakeholders at an early stage in the development of proposals and increase opportunities for public engagement and understanding of our marine ecosystems

This is a vital component of the introduction of any MPA or other conservation measure.

54. page 21. Marine Scotland recognises the tourism opportunities that flow from our marine biodiversity and their economic importance to coastal communities.

COAST would welcome such initiatives on Arran, linking the No Take Zone, a Demonstration and Research MPA in Lamlash Bay, the North Ayrshire new Outdoor Centre, Arran Schools, SNH, NTS and tourism.

58. page 21. For example, we believe that we should encourage the co-existence of MPAs and social and economic activities where they are mutually compatible as this exemplifies the key spirit of sustainable development.

This is an important consideration. It needs to include tourism, sea angling, wild salmon interests and wildlife tourism associated with the marine environment, and not just mobile fisheries or aquaculture, which in the past and present have a firm hold on government policies.

60. page 22. The Scottish Government is clear that once designated, effective management is essential to ensure the delivery of the conservation objectives of a MPA and thereby ensuring the site's contribution to the MPA network.

This is essential and also involves clear policies on dealing with infringements. Additional legislation on forfeiture of nets etc and loss of licence needs to be clear to all concerned. Marine Scotland Compliance must be proactive, and willing to prosecute offending infringers of the law. Monitoring recovery in areas which have been unsustainably fished or otherwise damaged is a vital part of a coherent network of MPAs.

69. page 25. Scotland is very fortunate in that it has a number of interested and motivated organisations and individuals with an interest in Scotland's marine environment.

The Marine and Coastal Ecosystems Group is highlighted. **The Group is made up of regulatory bodies and non-governmental organisations, as well as representatives from SNH, SEPA and Marine Scotland. Other organisations and stakeholders are also making a valuable contribution through the sustainable practices they follow.**

It would be interesting to know exactly how this group is composed and whether marine community stakeholders, sea anglers, wild salmon interests and static fishermen are represented or even consulted.

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