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**Richard Lochhead,  
Cabinet Secretary for Rural Affairs and the Environment,  
St. Andrew's House,  
Regent Road,  
Edinburgh. EH1 3DG**

**3<sup>rd</sup> April 2014**

Dear Mr Lochhead

As convenor, I am writing on behalf of Scottish Environment LINK's Marine Taskforce following recent correspondence surrounding our concerns about scallop dredging and other mobile fishing gear, identified using Vessel Monitoring System (VMS) data, taking place over fragile, protected reef features in the Lochs Duich, Long and Alsh marine SAC. We understand that to ensure protection of the listed features within the site, Marine Scotland is planning to prohibit fishing by dredge and bottom trawl methods in certain areas of the sea loch system. On behalf of all members of the taskforce, we welcome measures to prohibit these damaging fishing activities from the protected features and would urge that they are implemented as soon as possible.

The situation in Loch Alsh cannot but raise the question as to what damaging fishing activity is happening in other Scottish inshore and offshore Scottish marine SACs that may be compromising site integrity and risking those sites achieving Favourable Conservation status. Information readily available from the VMS clearly indicates that fishing is also taking place in Loch Sunart<sup>1</sup>, Firth of Lorn, Papa Stour, Mousa<sup>2</sup> and possibly many other SACs. We understand following the risk-based approach to managing fisheries currently being undertaken for English European Marine Sites, that a similar more streamlined review has been underway for some months in Scotland. As also indicated to your Minister in a recent LINK meeting and correspondence, we welcome such a review, believing it urgent and fundamental in order to comply with the Habitats Directive and ensure the protected features of Scottish European Marine Sites meet Favourable Conservation Status.

In summary, we welcome proposals to prohibit damaging fishing activities from the Lochs Duich, Long and Alsh marine SAC and look forward to earliest engagement with the ongoing risk-based review of fishing taking place for all of Scotland's European Marine Sites. In order to secure the long-term functioning of Scotland's marine ecosystems and the goods and services they provide, adequate protection and, where appropriate, recovery of the

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most important areas of our sea is crucial. This applies as much to forthcoming nature conservation MPAs as it does to existing European Marine Sites.

We look forward to Lochs Duich, Long and Alsh SAC receiving the protection the reef features merit and engaging with the wider review of the SAC network.

Yours sincerely,



**Calum Duncan**

Convenor, Scottish Environment LINK Marine Task Force  
(Scotland Programme Manager, Marine Conservation Society)

On behalf of:

Hebridean Whale and Dolphin Trust	Scottish Ornithologists' Club
Marine Conservation Society	Scottish Wildlife Trust
National Trust for Scotland	Whale and Dolphin Conservation
RSPB Scotland	WWF Scotland

<sup>1</sup> <http://www.scotland.gov.uk/Resource/0044/00442921.pdf>

<sup>2</sup> <http://www.nafc.uhi.ac.uk/study-at-nafc/marine-science-and-technology/strategy/SMSP%20Nov%202013.pdf>