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Mairi Gougeon
Minister for Rural Affairs and the Natural Environment
The Scottish Parliament
Edinburgh
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19th March 2019

Dear Minister

Follow up on meeting of 5th February 2019

On behalf of Scottish Environment LINK's Marine Group, I would like to thank you for taking the time to meet with us on 5th February to introduce the Marine Group and to discuss concerns about marine wildlife-watching activities, as outlined in our letter of [28th June 2018](#).

As mentioned in our meeting, work has been carried out by staff and students from Napier University in collaboration with the National Trust for Scotland to assess the disturbance to seabirds by recreational users at St Abbs National Nature Reserve. Preliminary results indicate that cliff-top pedestrian visitors have little impact on the breeding birds, but that boat-based tourism may be causing significant reduction in kittiwake breeding success and disturbance to guillemots using the rocks and ledges nearer sea level. Further work is planned in the coming summer to confirm these preliminary conclusions (see attached summary).

We are pleased to hear from you and your officials that Marine Scotland are engaging with tour operators and exploring further options to support the responsible development of this industry in the Moray Firth. With conservation aspirations for the rest of Scottish waters, including the four proposed marine protected areas (MPAs) for mobile species being designated, we urge that now is the time to act pre-emptively to ensure that disturbance of all protected species is understood, managed and minimised. Our recommendations to the Scottish Government are:

- To develop and maintain a central database of Scotland wide commercial marine wildlife-watching tour operators to enable oversight of the industry and monitor growth;
- To introduce a licencing scheme that will allow conditions to be added, including monitoring, to ensure a level playing field and ecosystem-based management within environmental limits;
- A requirement for mandatory training for all operators (e.g. WiSe scheme) and consistent use of a robust code of conduct across the industry.

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As discussed in our meeting, members of the Marine Group would be very happy to host you at their various coastal locations to show you the key areas and species that need progressive protection. We extend invitations to a number of projects, including Whale and Dolphin Conservation (WDC) Scottish Dolphin Centre, Spey Bay, Moray Firth, and WDC's field study site for Risso's dolphin boat research, Stornoway, Isle of Lewis. Hebridean Whale and Dolphin Trust invite you to their Discovery Centre in Tobermory and their Mull/Morven Hebridean Whale Trail locations. The Marine Conservation Society (MCS) is a proud partner in the ground-breaking Dornoch Environmental Enhancement Project (DEEP) with the Glenmorangie Company and University of Heriot-Watt who are restoring a native oyster reef in the Dornoch Firth. Glenmorangie host an MCS seasonal role at their distillery in Tain and would be delighted to welcome you to the distillery to find out more about the project.

Furthermore, as promised at our meeting, we have attached a copy of the letter sent on behalf of the Marine Group to Cabinet Secretary Fergus Ewing detailing our concerns and recommendations for management of inshore fishing activity in light of recent reported scallop dredging incursions into protected areas. Since we sent this letter we have heard of a further report of scallop dredging within part of the Loch Sunart to the Sound of Jura MPA currently restricted to such activity. We trust that the Scottish Government takes these reports very seriously and would be very happy to discuss any aspect of this further with yourself and the Cabinet Secretary.

Yours sincerely



Sarah Dolman
Deputy Convenor, Scottish Environment LINK's Marine Group