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07 March 2008

Dear Morag

### **Scottish Environment LINK Marine Task Force response to Marine Biodiversity Implementation Plan**

As Convenor of the Scottish Environment LINK Marine Task Force, I am writing in response to the Scottish Biodiversity Strategy Marine Biodiversity Implementation Plan 2008-2010. Members of the Marine Task Force contributed to the drafting of the actions in the draft plan and are supportive of the broad direction of the plan.

Our members are keen to see a Scottish Marine Bill that delivers protection, restoration and enhancement of Scotland's coasts and seas, including a halt to biodiversity loss by 2010 and an ecologically coherent network of marine protected areas by 2012, in turn helping meet impending requirements under the EU Marine Strategy Directive to deliver Good Environmental Status of our seas by 2020. Further details of what we would like Scottish and UK Marine Bills to deliver can be found at [www.savescottishseas.org](http://www.savescottishseas.org).

In particular, we therefore support the following Targets in the plan that we believe are necessary in order to help fulfil the aspirations outlined above:

1.1 An 'ecologically coherent network' of marine protected areas around Scottish waters is in the process of being established

**LINK MTF comment:** We believe a new marine protected area site-designation tool is essential to meet international commitments, protect nationally important marine species and habitats, halt the loss of marine biodiversity by 2010 and meet Good Environmental Status by 2020.

1.2 Action taken to assist 6-10 species and habitats, selected by defined criteria.

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**LINK MTF comment:** We support this action but would urge that resources required should follow identification of the need for action to protect priority species and habitats rather than important action not being taken simply due to resources being unavailable. In short, resources should follow identified policy priorities for marine species and habitat protection and not *vice versa*.

1.3 An updated Scottish Biodiversity List is available to all officers of public bodies whose activities impact on marine biodiversity.

**LINK MTF comment:** We welcome this action to produce a definitive list to link to the Biodiversity Duty under the Nature Conservation (Scotland) Act. However, a list of species will not lead to their protection without the appropriate powers in place to be able to stop damaging activities. A Scottish Marine Bill must deliver the appropriate powers to public bodies and officeholders in order for the Biodiversity Duty to be applied at sea in a meaningful way.

## 2 People

**LINK MTF comment:** We recognise that people are the key to properly protecting marine biodiversity and support actions that will lead to raised awareness of marine biodiversity across a range of sectors.

3.1 A set of Marine Ecosystem Objectives (MEOs) is proposed for Scotland.

**LINK MTF comment:** In order to measure delivery of an 'ecosystem approach' and to deliver Good Environmental Status by 2020 under the EU Marine Strategy Directive, we believe that a suite of MEOs, designed to monitor the health and functioning of Scotland's marine ecosystems, is essential.

4.1 Guidance and information on biodiversity duty and MEOs to officeholders of public bodies

**LINK MTF comment:** We welcome clarification of the roles of public bodies and officeholders in order to help them meet their biodiversity duty. I would repeat the point made in relation to 1.3 above that the Scottish Marine Bill must provide public bodies and officeholders the powers necessary to enable them to meet their biodiversity duty at sea.

## 5 Knowledge

**LINK MTF comment:** We support actions that will lead to more co-ordinated marine monitoring and appropriate resources being made available to those agencies that have a role in surveying the marine environment. However, we do not see lack of data in some areas as a barrier to beginning work toward identifying a possible network of ecologically-coherent marine protected areas. Conversely, when

development pressure exceeds knowledge available for a particular marine area, we support the precautionary principle, where a proposal is assumed to be damaging until proven otherwise.

We are content where LINK has been identified as a potential partner in the draft plan.

I would be pleased to discuss any of the issues raised in this letter.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Calum Duncan'. The signature is fluid and cursive, with a large initial 'C' and 'D'.

Calum Duncan  
Scottish Conservation Manager, Marine Conservation Society  
Convenor, Scottish Environment LINK Marine Task Force

The following organisations are signatories to this letter:

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