

Response to the Scottish Government Consultation on the Loch Carron nature conservation Marine Protected Area

by the Scottish Environment LINK Marine Group

Date: 8th June 2018



1. Do you support the designation of the Loch Carron Marine Protected Area?

Yes

2. Do you agree that the scientific evidence presented for the Loch Carron Marine Protected Area supports and justifies the case for its designation?

Yes

3. Do you have any comments on any aspect of the Loch Carron Marine Protected Area proposal?

LINK Marine Group fully support the designation of the Loch Carron MPA as a permanent addition to Scotland's developing MPA network, and the draft Marine Conservation Order. We welcome the proposal to extend the boundary of the Loch Carron Marine Protected Area (MPA) to include the full extent of the recorded flame shell beds and maerl beds. The designation of this site will contribute to the protection, enhancement and health of Scotland's marine area, and contribute to Scotland's marine biodiversity and seafloor integrity.

Flame shell beds are considered rare in the UK, and we recognise the significance of this site at UK, European and International level as the largest known flame shell bed in the world, and a potentially valuable source of larvae to areas outside the proposed MPA boundary. The boundary also encompasses a good example of maerl beds, which have a restricted distribution in north-east Atlantic waters and are identified as declining on the OSPAR threatened and/or declining habitats list. Flame shell beds and maerl beds provide complex habitats, supporting a high diversity of plants and animals, including commercially important species such as scallops. Both flame shell beds and maerl beds are also recognised as 'blue carbon' habitats, helping to mitigate the onset and impact of climate change through carbon sequestration. Providing protection to these habitats will be important in maintaining their on-going role in capturing and storing carbon, and also prevent damage that could lead to its release back into the atmosphere.

LINK Marine Group acknowledges and applauds the quick action of local divers, including those trained in Seasearch, to document the initial damage to the flame shell beds, highlighting the importance of citizen science project data to the development of Scotland's MPA network. We also welcome the thorough action taken by Scottish Natural Heritage, Marine Scotland and Heriot Watt University to corroborate these early reports and survey the full extent of the damage. We note that this survey work resulted in discovering that the flame shell bed in Loch Carron is part of the largest known flame shell bed in the world. This incredible discovery indicates that there are likely other Priority Marine Features (PMFs) in Scottish inshore waters that we do not yet have on record. It highlights the fact that a range of PMFs outside MPAs risk suffering irreversible damage from destructive fishing practices and the importance of the current and welcome proposals to improve the protection given to PMFs outside MPAs. It demands adopting a precautionary and ecosystem based approach to management, as well as expanding monitoring effort to improve our knowledge

of the distribution and function of our marine ecosystems. Monitoring will also allow us to rapidly detect changes in marine ecosystems (e.g. recovery) or changes associated with a changing climate that require further action.

We strongly welcome the Cabinet Secretary's rapid response and support for the recovery of the damaged flame shell beds last April, in line with General Policy 9(b) in Scotland's National Marine Plan, leading to the designation of the site as an emergency MPA. We look forward to engaging in the Scottish Government's proposals to improve the protection provided to 11 other PMFs within Scotland's inshore waters, in the hope to avoid a repeat occurrence.

4. Do you have any comments on the Conservation Objectives and Management Advice for the Loch Carron Marine Protected Area?

LINK Marine Group support the objective of 'recover' for the flame shell bed feature, given the damage sustained to one of the beds last year. We note that there is no indication of the condition of the maerl beds within the report, either to suggest a damaged or healthy status. Maerl is a slow growing feature, taking decades or more to form substantial beds (Hall-Spencer et al., 2003). Accordingly, we would prefer a 'recover' objective for the maerl bed feature, on a precautionary basis.

Reference:

Hall-Spencer, J. M., Grall, J., Moore, P. G., & Atkinson, R. J. A. (2003). Bivalve fishing and maerl-bed conservation in France and the UK—retrospect and prospect. *Aquatic Conservation: Marine and Freshwater Ecosystems*, 13(S1).

5. Do you have any comments on the draft Marine Conservation Order?

LINK Marine Group agree with the proposals in the Marine Conservation Order to prohibit mobile demersal gear from the proposed MPA for the protection and recovery of flame shell and maerl beds.

We query the lack of management measures for static gear, given that static gear is prohibited for the flame shell bed feature in the Upper Loch Fyne and Loch Goil MPA, where the conservation objective is also set to 'recover' for this feature. We acknowledge that static gear is considered to have a lower impact on seabed habitats than mobile fishing gear, and support sustainable static gear fishing activities within the site where appropriate. However, we note that FeAST indicates that surface abrasion is a high risk for both maerl and flame shell beds, and that damage may be caused to the delicate habitat structure by creels. Based on this, and given the precedent set in Upper Loch Fyne, we consider that it might be appropriate to include some regulation of static gear, such as a zonal approach.

We note that there is an aquaculture site whose 1km buffer overlaps the boundary of the proposed MPA. Recent evidence has highlighted the potentially significant negative impact of aquaculture activities on seabed habitats and surrounding ecosystems. Management should ensure no new finfish and shellfish aquaculture sites are developed within the MPA and, where there is risk of damage to protected features, existing facilities should be relocated. Previous advice indicated that strong tidal flows on maerl beds were assumed to flush away organic waste, but surveys around fish

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farms located near maerl beds found significant reductions in live maerl cover and faunal biodiversity at some considerable distance from the cages, while toxic chemicals were found to affect populations of crustaceans throughout entire sea loch systems. The impacts are the result of organic enrichments and toxic chemicals in fish feed used to combat sealice (Hall-Spencer 2006, 2007; SARF, 2016). There is an urgent need to review the impact of existing fish farms on a range of PMFs both within MPAs and beyond their boundaries.

References:

Hall-Spencer et al. (2006) Impact of fish farms on maerl beds in strongly tidal areas. *Marine Ecology Progress Series*, 326:1-9.

Hall-Spencer and Bamber (2007) Effects of salmon farming on benthic Crustacea. *Ciencias Marinas*, 33:353–366.

SARF (2016). SARF098: Towards Understanding of the Environmental Impact of a Sea Lice Medicine – the PAMP Suite

6. Do you have any comments on the Business and Regulatory Impact Assessments (BRIAs)?

We support the statement that there are multiple benefits to designating the MPA beyond economics, including societal benefits, and use values, such as recreational use (i.e. diving), and non-use values, where people place a value on the marine environment without seeing it. We also support the statement that “... *it should be noted that the societal cost of not designating Loch Carron an MPA could be both large and irreversible... the option to not designate holds the potential to undermine the overall ecological coherence of the Scottish MPA network*” (BRIA, p.8).

7. Do you wish to submit any documentation to support your response?

No.

This response was compiled on behalf of LINK Marine Group and is supported by: Marine Conservation Society, National Trust for Scotland, RSPB Scotland, RZSS, Scottish Wildlife Trust, Whale and Dolphin Conservation, WWF Scotland.

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