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Richard Lochhead
Cabinet Secretary for Rural Affairs and the Environment
St. Andrew's House
Regent Road
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13th June 2014

Dear Mr. Lochhead,

I am writing as Scottish Environment LINK's Marine Taskforce convenor following the publication of the Planning Scotland's Seas consultation analysis, and resultant advice from SNH and JNCC, and the recent LINK meeting with the Environment and Climate Change Minister. Prior to the summer's designation announcement, the Marine Taskforce request a meeting with you and Mr Wheelhouse to discuss our concerns about an apparent lack of Scottish Government ambition to meet its legal duty to enhance the health of Scotland's seas.

We were delighted to see overwhelming support for the proposed Nature Conservation Marine Protected Areas and urge the Scottish Government to take heed of public opinion and develop the network to deliver the protection and enhancement Scotland's seas urgently need. Notwithstanding the positive outcome of the consultation process, and our respect for the significant amount of effort invested in the process to date, we remain deeply concerned that the proposed MPAs as they stand will not deliver the necessary level of protection **and crucially enhancement** that is a legal requirement of the Marine (Scotland) Act 2010.

An independent scientific report¹ concluded that there are unlikely to be any pristine marine habitats on Scotland's continental shelf following a century and more of industrial activity, reinforced by the assessment of widespread decline and concern documented in Scotland's Marine Atlas. Yet, only 3 of the 33 proposed MPAs contain features for which there is a 'recover' conservation objective, and even then for only a tiny extent of rare, threatened and declining relict habitats. In light of this, we must very seriously question the ambition behind the network proposals. We ask for urgent formal clarification of how site conservation objectives will deliver the much-needed ecological recovery of individual sites and the wider marine environment.

The Scottish Government must seize this vital opportunity to set a high national and international standard in marine environmental protection and promote vital recovery of our seas. We look forward to meeting you to discuss these concerns urgently.

I look forward to hearing from you.

Yours sincerely,

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

¹ Hughes, D. & Nickell, T. (2009) Recovering Scotland's Marine Environment. Scottish Association for Marine Science Internal Report No.262



On behalf of:

Hebridean Whale and Dolphin Trust

Marine Conservation Society

National Trust for Scotland

RSPB Scotland

Scottish Ornithologists' Club

Scottish Wildlife Trust

Whale and Dolphin Conservation

WWF Scotland