

Response to the Scottish Government Consultation

Small Isles Marine Protected Area (MPA) Marine Conservation Order consultation 2016

by the Scottish Environment LINK Marine Group

October 2016



Scottish
Environment

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Summary

- LINK members support the Scottish Government's process to establish a network of **well-managed marine protected areas** and develop adequate management of anthropogenic activities within the sites to ensure they **contribute to the protection and enhancement of the marine environment**.
- LINK members are broadly supportive of the **amended derogations for the Marine Conservation Orders (MCOs)** for the Small Isles MPA.
- LINK members **are concerned that** the proposed no-trawling zone excludes the part of the Sound of Canna lying immediately to the east of Canna and north of Sanday which **will reduce the likelihood of conservation objectives being met** (by leaving protected features vulnerable).
- The **proportion of Burrowed mud habitat protected from trawling is insufficient**.

Introduction

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment.

Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland. LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. LINK members welcome the opportunity to comment on this consultation.

Small Isles MPA Consultation

LINK Marine Group welcome the proposed measures for conservation of the identified Priority Marine Features within the Small Isles MPA with two main exceptions: i) the proposed no-trawling zone excludes the part of the Sound of Canna lying immediately to the east of Canna and north of Sanday; and ii) the area of burrowed mud within the zone protected from trawling is insufficient.

1. Area Lying East of Canna

The Sound of Canna contains the most diverse assemblage of features within the MPA, including horse mussel beds, northern featherstar aggregations, northern sea fan and sponge communities and, most notably, the fan mussel aggregations, the only one known in the UK. Fan mussels are

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primarily threatened by the use of mobile fishing gear and its current, relict distribution is believed to be largely confined to zones that are naturally protected from trawling by virtue of their topography¹. The Sound of Canna is one such zone. VMS data confirm that the remaining fan mussel aggregation has been subject to very low trawling pressure from 2007-2013 although the zones all around it have been subject to medium to high pressure.

While the proposed no-trawl zone includes the relict fan mussel aggregation, it does little other than duplicate the protection already afforded by the topographic features in the Sound of Canna that have allowed fan mussels to persist. Crucially, the continuation of trawling pressure around the proposed no-trawl zone allows only limited expansion for the fan mussel population beyond its current distribution. In common with many other sedentary benthic invertebrates, fan mussels have a planktonic larval stage, which, amongst other benefits, ensures larval dispersal, population expansion and, most importantly, population stability. The Sound of Canna represents the only known viable source population of fan mussels in Scottish waters², which makes it highly vulnerable to disturbance and environmental change. It is for this reason that, in response to the 2013 Possible Nature Conservation Marine Protected Area consultation, we stated our support for 'conserve' objectives for all features *other* than the fan mussel (and indeed northern feather star) aggregations, for which we stated 'recover' objectives be set, a position we stand by.³ It is, therefore, essential that the amount of protected habitat suitable for fan mussels is increased within the Small Isles MPA to ensure population expansion and persistence. The nearby areas of sublittoral mud are the most suitable habitat for fan mussel recruitment and are therefore essential for the expansion and enhancement of the remaining population. For the Small Isles MPA to be effective in restoring the health of its fan mussel population, the proposed no-trawl zone should be expanded upon to include more of these important habitats.

The zone to the east of Canna also contains known records of the extremely rare burrowing anemone *Arachnanthus sarsi* - an MPA Search Feature for which no suitable sites were identified - as well as other PMFs, most notably northern feather star, northern sea fan and mud volcano worms, all of which will be threatened by trawling within this zone. To repeat our response to the 2014/15 consultation⁴;

"A rare example of the burrowing sea anemone (*Arachnanthus sarsi*) has been identified in the muddy seabed off the north east of Canna. This species is considered to be of international importance in Scottish waters as a result of declines in UK populations. It is likely that more may inhabit this area, as yet undocumented, and we think that as much of this area as possible should be closed to mobile demersal fishing activities as a precaution to ensure that this key habitat, and the biodiversity it hosts, is conserved."

2. Burrowed Mud

LINK members are concerned that the proportion of burrowed mud habitat protected from trawling within the MPA is insufficient. The proposal indicates that only 19% of the sublittoral mud

¹ Stirling, D.A, Boulcott, P., Scotland, B. E., and Wright, P.J. Using verified species distribution models to inform the conservation of a rare marine species, Marine Scotland Science

² <http://www.snh.gov.uk/docs/A978513.pdf>

³ <http://www.scotlink.org/files/policy/ConsultationResponses/LINKMPAResponseNov2013.pdf>

⁴ http://www.scotlink.org/wp/files/documents/ScotLINK_MPA_management_consultation_response_0202151.pdf

LINK is a Scottish Charity (SC000296) and a Scottish Company Limited by guarantee (SC250899). LINK is core funded by Membership Subscriptions and by grants from Scottish Natural Heritage, Scottish Government and Charitable Trusts.

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community and 55% of the recorded tall sea pens are protected from trawling. LINK members suggest that the proposed measures should do more to consider the wider ecosystem that relies on interaction with the burrowed mud habitat. "For example a large amount of recorded tall sea pen (*Funiculina quadrangularis*) habitat will remain open to trawling and dredging under the revised proposals, a species more sensitive to damage and less able to recover than other sea pen species⁵." In addition to the importance of this habitat as a nursery zone for fan mussels, the overall protection of this feature in Scottish waters is insufficient. Given the stark difference between the abundance and diversity of benthic species in the Sound of Canna compared to the rest of the MPA, LINK members highlight the clear need to remove pressure from mobile demersal fishing gear across more of the soft sediment habitats to improve the benthic biodiversity.

Additional Comments

The Small Isles MPA exists within a newly designated Special Area of Conservation for harbour porpoise and within the proposed ncMPA for minke whales and basking sharks. Increased fishing effort using static gear and unintentional 'edge effects' resulting from the shifting of gear use along MPA or MCO boundaries, created by gear displacement, might be detrimental to these species. We therefore encourage a joined-up approach to MCOs and MPA management procedures, as well as wider measures to include the scope of the proposed Inshore Fisheries Bill, and seek assurance from the Scottish Government that measures to protect features in one MPA are compatible and complementary with those of adjacent or overlapping MPAs.

This response was compiled on behalf of LINK Marine Group and is supported by:

Marine Conservation Society
National Trust for Scotland
RSPB Scotland

Scottish Wildlife Trust
Whale and Dolphin Conservation
WWF Scotland

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⁵ Greathead, C. F., Donnan, D. W., Mair, J. M., & Saunders, G. R. (2007). The sea pens *Virgularia mirabilis*, *Pennatula phosphorea* and *Funiculina quadrangularis*: distribution and conservation issues in Scottish waters. *Journal of the Marine Biological Association of the United Kingdom*, 87(05), 1095-1103.

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