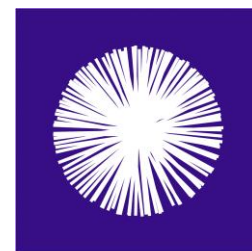


## Comment on JNCC updated conservation advice for the East of Gannet and Montrose Fields offshore nature conservation MPA by the Scottish Environment LINK Marine Group

Date: 24th January 2018



Scottish  
Environment



### 1. Do you think the updated draft advice is an improvement on the existing formal advice in the Designation Order for East of Gannet and Montrose Fields NCMPA?

#### General comments:

Scottish Environment LINK Marine Group welcome JNCC's approach to updating its conservation advice for offshore nature conservation MPAs. LINK believe that the updated draft advice is an overall improvement on the existing advice in the Designation order, providing up to date and site relevant information. In particular, LINK welcome the inclusion of recent survey work (O'Connor, 2016) in the area to inform protected feature condition 'favourable – more information needed' to 'unfavourable', requiring measures to support feature recovery. However, we have remaining concerns about elements of the conservation advice package that we highlight in the following comment.

We welcome plans to update JNCC's Interactive MPA Mapper to include data from the 2015 survey of the site in relation to the extent and distribution of features.

### 2. Do you find the draft conservation advice readily accessible? (Is it easy to understand and easy to find what you're looking for?)

When read together the draft documents form a more comprehensive guide to understanding the principal aim of the MPA and inform management decisions. However, LINK consider that the advice is at times lengthy and confusing, and does not clearly summarise the advice in one document.

#### Conservation objectives and Supporting Advice on Conservation Objectives (SACO)

LINK welcomes the explanation of conservation objectives in relation to each protected feature within the 'Conservation Objectives' document, as well as the inclusion of information relating to feature attributes (structure and function; extent and distribution; supporting services). To avoid confusion between the two documents, we suggest that the overall conservation objective (i.e. recover or conserve) for each protected feature, and the rationale for this should be clearly stated in the Conservation Objectives document. This would be relevant in the case of Ocean Quahog aggregations, where the protected feature is considered to be in 'unfavourable' status within the site suggesting action is required to restore the feature to favourable condition, yet the conservation objectives for the respective feature attributes are set to 'conserve'. Additionally, we would suggest that information on the condition, and suggested management for each feature attribute be included in the 'summary' boxes within the SACO.

#### *Response to advice on Ocean Quahog Aggregations*

We acknowledge the inclusion of 'quality and quantity of its habitat and the composition of its population in terms of number, age and sex ratio to ensure the population is maintained in numbers which enable it to thrive' within the conservation advice for Ocean quahog aggregations (including supporting services). Additionally, we would question the suitability of the following statement: 'any temporary reduction of numbers is to be disregarded if the population is sufficiently thriving and resilient to enable its recovery', and seek clarification from JNCC to define what is meant by 'temporary'. ICES (2014) indicates recovery from perturbation should be considered within life histories of species and natural rates of change, and where this would take multiple decades or more, management should avoid perturbation.

## LINK Consultation Response

Given the slow-growing nature of Ocean Quahog (Thompson et al., 1980), susceptibility of juveniles to disturbance, and long-lived nature (Brix, 2013), recovery of Ocean Quahog aggregations is likely to take several decades or longer. This suggests that a 'temporary' reduction, by the commonly accepted definition, would not allow a 'rapid' recovery for this species, nor be in line with the objective to maintain populations.

We also note that JNCC SACO advises a 'conserve' objective for each of the three feature attributes for Ocean Quahog aggregations, on the basis that 'it is unclear if human intervention within the site is capable of ensuring recovery of the feature due to the influence of wider environmental parameters, such as climate change', and that 'recovery of a population within a site is likely to be reliant on an infrequent supply of recruits from elsewhere'. However, given the reported widespread declines in abundance of this species throughout the North Sea (Rumohr et al., 1998), the low average density recorded across the site in 2015 (O'Connor, 2016), and their vulnerability to physical disturbance particularly juveniles (Witbaard and Bergman, 2003), LINK consider that measures are required to support the highest possible chances of recruitment success, and would support a recovery objective for Ocean Quahog attributes.

We recognise JNCC draft advice is to 'minimise, as far as is practicable, disturbance to individuals that may result in a change to the extent and distribution of Ocean quahog aggregations within the site', and support advice that 'activities must look to avoid, as far as is practicable.... change in the extent and distribution'. We suggest that this should include avoiding all activity known to disrupt Ocean Quahog aggregations, such as bottom towed fishing activity (Bergman and Van Santbrink, 2000). Furthermore, given the difficulty in recording these species by drop down video footage, and grab sampling and the suitability of the habitat for ocean quahog aggregations extends throughout the majority (>99%) of the seabed habitats within the site, it is possible that Ocean quahog aggregations could extend beyond the confirmed sightings. We would therefore suggest that precautionary measures should be adopted throughout the site.

LINK strongly support long-term monitoring of the site to further inform protected feature condition within the site, and inform management measures. In particular to determine the long-term population trends of Ocean Quahog aggregations and the nature of scale and impact of activities taking place that are capable of affecting extent and distribution, and structure and function of Ocean Quahog attributes is required.

### **Draft East of Gannet and Montrose Advice on operations output**

LINK welcome the Advice on operations output that considers fishing activity in relation to feature sensitivity to these pressures, including demersal seine, demersal trawl, pelagic fishing, anchored nets and lines as well as electrofishing. Although information on offshore infrastructure (oil and gas developments and decommissioning, cabling, renewables) is provided in the Advice on operations output document, they are primarily considered in relation to the PMFs within the SACO.

At present the SACO provides information on some of the potential pressures on feature attributes, primarily offshore infrastructure, directing the reader to the Advice on operations output for additional advice. We consider that it would be beneficial to provide summary information on the potential impact of all activities on feature attributes within the SACO. Additionally, we would support the inclusion of information on feature sensitivity in relation to all activities within the same document (i.e. Advice on operations output).

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Registered office: 13 Marshall Place, Perth PH2 8AH, T. 01738 630804, [information@scotlink.org](mailto:information@scotlink.org)  
Advocacy office: Dolphin House, Hunter Square, Edinburgh, EH1 1QW, T. 0131 225 4345, [advocacy@scotlink.org](mailto:advocacy@scotlink.org)

**3. Does the draft conservation advice clearly set out what evidence has been used and how we have used it?**

Yes, the draft conservation advice clearly outlines what scientific information has been used and how this has been used to inform JNCC conservation advice.

**4. Do you have any further information about East of Gannet and Montrose Fields NCMPA which you feel we should consider in our conservation advice going forward?**

LINK strongly supports long-term monitoring of the site is required to inform:

- A greater understanding of the significance of the role which burrowing species, play in maintaining the function and health of deep-sea mud habitats.
- An understanding of contaminant levels within the site, and a better understanding of the hydrodynamic regime within the site.
- Confidence in setting a conserve objective for ocean Quahog aggregation attributes
- A view on the nature of scale and impact of activities taking place that are capable of affecting extent and distribution, and structure and function of Ocean quahog aggregations.

References:

Bergman, M.J.N. and Van Santbrink, J.W. (2000) Mortality in megafaunal benthic populations caused by trawl fisheries on the Dutch continental shelf in the North Sea in 1994. ICES Journal of Marine Science, 57: 1321-1331.

Brix, L. (2013). New records: World's oldest animal is 507 years old.

ICES (2014) EU request to ICES for review of the Marine Strategy Framework Directive: Descriptor 6 – Seafloor integrity. ICES Advice 2014, Book 11:1–20.

Thompson, I., Jones, D.S and Ropes, J.W. (1980). Advanced age for sexual maturity in the ocean quahog *Arctica islandica* (Mollusca: Bivalvia). Marine Biology, 57: 35-39.

Rumohr, H., Ehrlich, S., Knust, R., Kujawsik, T., Philippart, C.J.M and Schroder, A. (1998). Long-term trends in demersal fish and benthic invertebrates. In: Lindeboom, H.J. and de Groot, S.J. (1998). The effects of different types of fisheries on the North Sea and Irish Sea benthic ecosystems.

O'Connor, J. 2016 Cruise report 1515S: Monitoring survey of East of Gannet and Montrose Fields and Norwegian Boundary Sediment Plain Scottish Nature Conservation Marine Protected Areas, JNCC Report 580.

Witbaard, R. and Bergman, M.J.N. (2003). The distribution and population structure of the bivalve *Arctica islandica* L. in the North Sea: what possible factors are involved? Journal of Sea Research, 50: 11-25.

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

**For more information contact:**

Emilie Devenport, Marine Policy and Engagement Officer, Scottish Environment LINK:

[emilie@scotlink.org](mailto:emilie@scotlink.org), [www.scotlink.org](http://www.scotlink.org), [www.savescottishseas.org](http://www.savescottishseas.org)

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