



Scottish
Environment

LINK

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Thérèse Coffey MP,
Parliamentary Under Secretary of State for
the Environment and Rural Life Opportunities
Defra
Nobel House
17 Smith Square
London
SW1P 3JR

7 September 2016

Dear Dr Coffey,

Marine Special Protection Areas

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations, with over 35 member bodies representing a range of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Alongside affiliated bodies throughout the UK we have been advocating for the protection of marine wildlife for decades. Protected areas are a key response to global biodiversity loss and although recent progress has been made in UK seas, the protection of important sites at sea for seabirds remains a significant gap in the emerging network of marine protected areas. Indeed, as a result of the failure of successive governments to make progress on this issue, the classification of marine Special Protection Areas (SPAs) under the Birds Directive is now 35 years overdue. Within this time period populations of breeding seabirds have shown sustained declines, particularly in the Northern Isles where some black-legged kittiwake colonies have declined by over 90%.

We therefore warmly welcomed the launch of a public consultation on ten marine SPAs in Scottish Territorial Waters by the Scottish Government in July. These sites, if well managed, will help improve the prospects of some of Europe's most rare and vulnerable birds.

However, we were highly concerned that five sites with offshore (beyond 12nm) or cross-border components had been held back from the consultation package pending agreement of the UK Government as required under the Marine & Coastal Access Act 2009.

The delayed sites include the seas off St Kilda, the remote archipelago which is a UNESCO World Heritage Site and home to the largest seabird colony in Europe. Together with the Outer Firth of Forth and St Andrews Bay draft SPA it will provide much needed protection at sea for the Atlantic puffin, which has experienced rapid declines across its European range and is now classified as Endangered on the IUCN European Red List.

Our members have spent many years supporting Scottish Natural Heritage and JNCC data collection and analysis to identify areas that meet the UK SPA selection criteria and we are confident in the



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scientific case that has been made.

There is considerable public support for measures designed to safeguard nature for future generations, most recently demonstrated by the unprecedented response to a European Commission consultation that saw over 100,000 voices from the UK speak up in defence of the Nature Directives. In light of this, together with the UK Government's legal obligations and commitment to global conservation goals we urge you to agree to the Scottish Government proceeding with formal public consultation on these five SPAs without further delay.

This request is part of a wider call from environment non-government organisations across Scotland, England, Wales and Northern Ireland for urgent action to put in place an ecologically coherent network of well-managed Marine Protected Areas as soon as possible. Our joint position on what must be considered in developing and managing the network is [here](#).

We look forward to a swift resolution of this matter.

Yours sincerely,



Calum Duncan

Convenor, Scottish Environment LINK Marine Group
www.scotlink.org/workareas/marine/

On behalf of:

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

Cc. Roseanna Cunningham MSP, Cabinet Secretary for Environment, Climate Change and Land Reform

