**Marine Protected Areas Network Proposals Consultation**

**RESPONDENT INFORMATION FORM**

*Please Note* this form **must** be returned with your response to ensure that we handle your response appropriately.

1. **Name/Organisation**

   **Organisation Name**
   Scottish Environment Link

   **Title**
   - Mr  ✔
   - Ms  
   - Mrs  
   - Miss  
   - Dr  

   *Please tick as appropriate*

2. **Postal Address**

   Scottish Environment LINK
   2 Grosvenor House
   Shore Road
   Perth

   **Postcode**  PH2 8BD
   **Phone**
   **Email**  Robin.reid@rspb.org.uk

3. **Permissions**

   - **I am responding as…**
     - Individual  /  Group/Organisation  ✔

   (a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

   *Please tick as appropriate*  ✔ Yes  

   (b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

   *Please tick ONE of the following boxes*  
   - Yes, make my response, name and address all available
   - Yes, make my response available, but not my name and address
   - Yes, make my response and name available, but not my address

   (c) The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

   Are you content for your response to be made available?

   *Please tick as appropriate*  ✔ Yes  

   (d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so.

   Are you content for Scottish Government to contact you again in relation to this consultation exercise?
Response to Consultation on Fisheries Prohibitions in the Outer Hebrides.

Scottish Environment LINK Marine Group

Date: 18 January 2016

General Comments on the Consultation

Scottish Environment LINK’s Marine Group is grateful for and welcomes the opportunity to respond to the consultation on fisheries prohibitions in the Outer Hebrides. We acknowledge the need to improve fisheries management around the Outer Hebrides and support the Outer Hebrides Inshore Fisheries Group’s efforts to address this need.

We also support Scottish Government’s vision for "a more sustainable, profitable and well-managed inshore fisheries sector in Scotland" and note in particular the recommendation made by Marine Scotland funded research that biogenic reefs and beds should be protected from scallop dredging wherever they occur (Cappell et al., 2013).

Fisheries management measures should contribute to wider ecosystem health and deliver against Scottish Government’s obligations and aims, including

- The protection, and where appropriate enhancement of the health of the marine area, under the Marine (Scotland) Act 2010.
- Achieving Good Environmental Status, under the Marine Strategy Framework Directive
- To encourage fishermen to recognise the ecosystem approach to fisheries management and the protection of the natural environment

In the past 5 years we have regularly engaged in government and IFG discussion and consultation to assist in the delivery of these aims and obligations, particularly with a view to better spatial management of inshore fisheries, and particularly with regards to protecting sensitive

seabed habitats from potentially damaging activities including scallop dredging\textsuperscript{4,5,6}.

We would hope that any redrafted fisheries management measures proposed by the Outer Hebrides IFG would take account of recommendations of Cappel et al. and the earlier Beukers-Stewart report to the Statutory Nature Conservation Bodies\textsuperscript{7} and provide better protection to key scallop nursery and breeding areas resulting in a more productive and sustainable fisheries and a healthier benthic ecosystems. We regret that the proposals put forward here do not appear to deliver that.

This consultation response has been submitted by the following members of the Scottish Environment LINK Marine Group:

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

1. **Consultation Questions**

**Q1.** Do you support changing the prohibition period for static gear fishing in the Bragar to Dell area?

Yes ☐ No ☐

**Additional comments**

\[^{5}\text{http://www.gov.scot/Publications/2012/01/7927/0}\]
\[^{7}\text{http://arrancoast.com/website_pdf/beukers_stewart_scallop_proposed_management_inuk.pdf}\]
Q2. Do you support removing the prohibition on mobile gear fishing in the Sound of Harris area?

Yes ☐ No X ☐

**Additional comments**

We do not support removing what is effectively a seasonal prohibition on mobile gear fishing in the Sound of Harris area. We note the presence of Maerl records within SSI 276/2004 in the area inside Loch an Siar, in waters near Duigeir and Sodhaigh Mor, and within the Sound of Harris, in waters near Killegray. We note and support the recommendation from Cappell et al (2013)\(^8\) that all biogenic reefs and beds, including Maerl, should be protected from scallop dredging. Following this, these areas of Maerl should be protected from dredging pressure.

We acknowledge these areas of maerl may already be impacted by scallop dredging activity and other mobile gear outside of March – September. However, we recommend that the potential of damage to these features from additional scallop dredging pressure risks their deterioration.

We would support further restrictions – not fewer – on scallop dredging within the Sound of Harris to enable previously impacted maerl beds to recover and to contribute to the long-term protection of unimpacted maerl beds. As discussed in our preamble, protection of this habitat is in the long-term best interest of scallop fishery management around the Outer Hebrides since maerl beds are important nursery grounds for juvenile scallop.

Q3. Do you support expanding the seasonal prohibition that restricts scallop dredging in the Loch Maddy to Stuley Island area to include all methods of fishing for scallops?

Yes ☐ No X ☐

Additional comments

We do not consider the environmental consequences of expanding this prohibition to be significant.

Q4. Do you support extending southwards the prohibition on static gear fishing in the Northern Barra, South Uist, Benbecula, North Uist and Harris area?

Yes ☐  No ☐

Additional comments

Q5. Do you support introducing a seasonal prohibition on static gear fishing for shellfish in the Loch Roag area?

Yes ☐  No ☐

Additional comments