

## **Scottish Environment LINK Marine Tourism Strategy Consultation Response**

**by the Scottish Environment LINK Marine Taskforce**

**January 2015**



### **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 organizations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for this community in communications with decision-makers in Government and its agencies, Parliaments, the civic sector, the media and with the public.

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 Taskforces – 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.

### **Does this document capture the ambitions and priorities for the marine tourism in Scotland?**

No, the protection and enhancement of the marine environment should play a more prominent role in the strategy.

The Marine (Scotland) Act 2010 put in place a number of measures to help Scotland “*enhance the health of the Scottish marine area*”, a natural resource of considerable value to the marine tourism sector. 86% of visitors to Scotland said that “*breathtaking scenery and landscapes*” were the key attributes of Scotland as a destination<sup>1</sup>. Given that such a high percentage of tourists in Scotland cite nature as an attraction which draws them to Scotland, the tourism industry must have a role in the protection and conservation of the marine environment, including valued land and seascapes for their intrinsic value and to ensure the long term sustainability of the industry and this natural and cultural resource.

A marine tourism industry that contributes to achieving a healthy marine environment and operates within its environmental limits should be a key part of the vision, as outlined in the Strategic Framework. A healthy marine environment underpins the ability of industry to successfully operate within marine areas, therefore its protection and enhancement should be a vision clearly set out in the Strategy. It is

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<sup>1</sup> <http://www.visitscotland.org/pdf/Insights%20UK%20Consumer%20Behaviour%202013%20final.pdf>

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therefore remiss to only include mention of the environment under the 'sustainability' heading of the 'capability' section of the strategic framework. 'Sustainability' is used almost exclusively in economic terms but environmental sustainability must be given more prominence in the strategy.

### **Do you recognise and relate to the definition of marine tourism presented in the draft strategy?**

Scottish Environment LINK (hereafter 'LINK') would advocate for the amalgamation of the definitions of 'marine tourism' and 'coastal tourism'. Cetacean, seal, basking shark and bird watchers who visit the coast and watch from headlands and islands and those who come to enjoy Scotland's spectacular marine and coastal scenery are marine tourists and generate income for the marine tourism industry.

### **Have we identified the priority growth opportunities for the industry in terms of the key themes and actions?**

No comment on priority growth opportunities.

However, viewing marine wildlife (including seabirds, seals, basking sharks, whales and dolphins) is the main driver for over one million trips to Scotland every year, with nature based tourism contributing £1.4 billion per year to Scotland's economy (direct economic impact), and 39,000 (FTE) jobs are reliant on nature based tourism<sup>2</sup>. We cannot comment on the potential for growth, but hope that the strategy could better reflect the important role marine wildlife tourism has within the industry and the importance that any expansion is done strategically and sustainably.

### **What are the main actions you would wish to see the marine tourism industry achieve under the three main strategic themes listed in the draft strategy?**

The marine tourism industry has a role to play in the conservation and enhancement of the marine environment, a role which covers all three themes. This can manifest itself in a number of ways, for example, tourists or boat users may contribute to our understanding of the marine environment through citizen science (such as collecting wildlife sightings during trips), in turn helping identify areas of natural importance or indeed degraded areas, and wildlife watching businesses can provide positive interpretation of the marine environment, the benefits it provides and the threats it faces to raise awareness among those visitors. Industry bodies may wish to work in partnership with conservation groups to advocate for protection of important wildlife and scenic areas, or help develop best practice guidelines to ensure wildlife is not disturbed. This short list is far from exhaustive, but highlights some of the important ways that the environment has a place in the strategic themes. LINK is happy to help develop a strategy for marine wildlife tourism best practice guidelines, and we believe this should include a centralised database of all marine tourism operators.

### **What can you do to help deliver the strategy and make a significant improvement/step change to marine tourism in Scotland?**

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<sup>2</sup> <http://www.snh.gov.uk/docs/B720765.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.

Registered HQ office: 2 Grosvenor House, Shore Road, Perth PH2 8BD tel 01738 630804 email [enquiries@scotlink.org](mailto:enquiries@scotlink.org)  
Parliamentary office: 3rd Floor, Gladstone's Land, 483 Lawnmarket, Edinburgh EH1 2NT tel 0131 225 4345 email [parliamentary@scotlink.org](mailto:parliamentary@scotlink.org)

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LINK is made up of over 35 environmental organisations with a range of expertise in marine matters. LINK is committed to working in partnership with the Scottish Government and industry to ensure that changes in how Scotland's marine space is used, including economic and industrial activity, occurs within environmental limits in order to avoid significant harm to species, habitats and valued land/seascapes and, where possible, to enhance the health of the marine environment. LINK would like to engage and advise on how best marine tourism can grow within environmental limits and help contribute to the protection, enhancement and understanding of Scotland's marine environment.

Many members of LINK also run wildlife tourism centres all around Scotland's coastline and so have long-standing expertise of interpretation and conservation within the tourism sector. The cost of providing interpretation and education with regards to natural history is usually borne by charities and trusts, yet these organisations have little mention in the strategy.

### **Additional Comments**

The Marine Tourism Strategy should seek to integrate with other plans and strategies, such as Tourism Scotland 2020, the National Marine Plan, Regional Marine Plans (as they are developed), Scotland's Biodiversity Strategy and the UK Marine Policy Statement. In particular, LINK recommends that the Marine Tourism Strategy must reference the Scottish Marine Wildlife Watching Code, currently being updated by SNH. Various legislative procedures exist to protect wild animals, and the tourism industry has a responsibility to ensure this legislation is adhered to and that tourists enjoy Scotland's wildlife in a way that avoids disturbance and harm. This applies as much to coastal (land-based) wildlife watching as it does to (*in situ*) marine wildlife watching.

Of particular interest are seal haul-out sites, as noted in The Protection of Seals (Designation of Haul Out Sites) (Scotland) Order 2014. Guidance on the appropriate behaviour around all sites designated for seals, including seal haul-out sites and Special Areas of Conservation, should be advocated for through the Marine Tourism Strategy and promoted through tourism industry channels.

As the numbers of people using Scotland's marine area grows, there is great potential for the tourism and recreation sector, marine and coastal recreational users and marine and coastal visitors to contribute to our understanding of Scotland's marine and coastal wildlife. Formal and informal recording of wildlife sightings is one such example, where modern technology has a great potential role to play. A mobile phone application or monitoring website could be developed to help collate this information and disseminate it to interested parties. This has mutual benefits for environmental organisations and the tourism industry, and is an excellent example of partnership working.

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Rural and remote communities were identified in the strategy as potential beneficiaries from increased marine tourism but there is no mention of engaging with communities in the strategy. They are likely to be key stakeholders in delivering the strategy in many places and should perhaps be included.

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

Hebridean Whale and Dolphin Trust  
Marine Conservation Society  
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RSPB Scotland  
Scottish Ornithologists Club  
Scottish Wildlife Trust  
Whale and Dolphin Conservation  
WWF Scotland

### **For more information contact:**

Calum Duncan  
(Scotland Programme Manager, Marine Conservation Society; Convener, LINK Marine Taskforce)  
E-mail: [Calum.Duncan@mcsuk.org](mailto:Calum.Duncan@mcsuk.org)

or the LINK Marine Policy Officer, Esther Brooker  
via email on [esther@scotlink.org](mailto:esther@scotlink.org)  
[www.scotlink.org](http://www.scotlink.org)

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