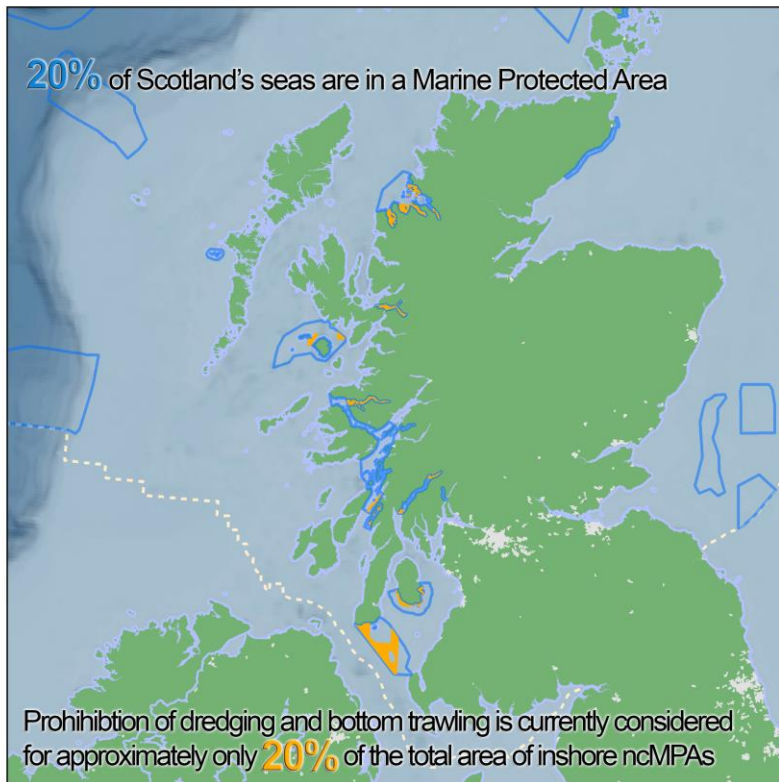


Scottish Environment LINK members note and welcome the RACCE committee's interest on the subject of **management and enforcement** within the Marine Protected Area (MPA) network, as discussed during the stakeholder evidence session held at the Scottish Parliament on 13th August 2014. The following information has been prepared by the LINK Marine Taskforce as supplementary evidence to complement our [earlier submission](#).

We hope it will provide further context to the committee's scrutiny of the development of the Scottish MPA network and focusses on three issues:

1. Management of MPAs:



- Designated nature conservation MPAs
- Proposed zones of management (fisheries displacement study)

To date, formal indications of how the MPA network will be managed suggest that current levels of fishing activity will continue without additional management in most MPAs. As part of a fisheries displacement assessment, Marine Scotland have outlined [potential management zones](#) in nine inshore MPAs, where only small patches of features will be afforded protection.

No statutory fisheries management has yet been established. Since designation of the MPAs, the Scottish Fishermen's Federation have established voluntary measures for their members within three MPAs for smaller patches of sensitive features than those outlined by Marine Scotland.

LINK members note that planned regional management discussions (starting in October) will take forward fisheries management of certain MPAs, but have concerns about the emerging MPA management regime, namely:

- sensitive key features, which require urgent protection, have not been fully included within the voluntary closures or the target areas for statutory management within the sites;
- the Marine (Scotland) Act 2010 requires that conservation objectives are met at a **site level**; managing disparate patches across a site, each with their own objectives, is less likely to contribute to the improvement in wider ecosystem health required by the Act;
- some of the measures within target MPA management zones still allow bottom-towed mobile fishing gear to be used on features which are in need of a permanent rest from impacts in order that they do not decline further and are given scope for recovery

LINK members highlight two MPAs - Small Isles ([Appendix 1.1](#)) and Wester Ross ([Appendix 1.2](#)) as case studies to illustrate the stark differences between the features needing protection and current management approach.

[Appendix 1.1](#)

[Appendix 1.2](#)

2. Public expectations of MPAs:

LINK members remain supportive of a scientific approach to identifying and managing MPAs, but it is crucial that management measures reflect the urgent need to protect and recover our seas as highlighted in Scotland's Marine Atlas and the fact that many MPA sites are acknowledged as having been modified by human activity. If designation does not lead to management measures that actively protect and recover the ecological health of these MPAs and wider seas, communities of place and interest risk being disenfranchised and disillusioned by the entire process. LINK members have received feedback from within their own memberships expressing concern that the new MPAs are simply 'paper parks,' given that some damaging activities have been allowed to continue in newly-designated MPAs. There has already been disappointment amongst coastal community groups that scallop dredging will continue within areas of sites now designated for protection, as evidenced by a written petition circulating around the Wester Ross area ([online version](#)) and concerns [consistently expressed](#) by the community-led organisation (and 3rd party proposer of the South Arran MPA) Community of Arran Seabed Trust. The view of Marine Protected Areas being inadequately protected from the most damaging activities in sensitive inshore areas has the potential to damage public confidence in a process that many people expected to deliver change in the management of the marine environment.

3. Enforcement of MPAs:

During the stakeholder evidence session (13th August) the RACCE Committee discussed the issue of resourcing available to effectively enforce a complex network of MPAs. The enforceability of management is crucial and it is essential that any measures put in place to prevent fishing in marine Special Areas of Conservation or nature conservation MPAs are not hamstrung by the problems embedded in almost all of the other Fisheries Closed Areas around the UK.

LINK members highlight the weaknesses of current approaches to enforcement, by documenting a history of squid fishing within the St Abbs Voluntary Marine Reserve including two incident case-studies. Appendix 2



Scottish Environment LINK's Marine Taskforce collectively represents over **480,000 memberships** and comprises of eight organisations: Hebridean Whale & Dolphin Trust; Marine Conservation Society; National Trust for Scotland; RSPB Scotland; Scottish Ornithologists' Club; Scottish Wildlife Trust; Whale & Dolphin Conservation; WWF Scotland;