



Response to the British Marine Consultation on Giant Strides: Scotland's Marine Tourism Strategy

by the Scottish Environment LINK Marine Group

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Summary

LINK recognises the potential benefits well managed, sustainable marine tourism can have on the environment through environmental stewardship, experiences that connect people and nature, and alternative employment to traditional extractive industries in remote rural communities.

LINK members welcome the opportunity to comment on this consultation and considers that Giant Strides provides an opportunity for the marine tourism industry to set out ambitious environmental aims, which are essential for Scotland to be a "world leader" in marine tourism, at a time of unprecedented global biodiversity loss and climate crisis.

The strategy should recognise and consider the biodiversity and climate crisis and include reference to management of marine wildlife watching.

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 the environment.

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 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.

Do you agree with the vision, mission and themes?

Giant Strides recognises the environment more than its predecessor 'Awakening the Giant' which is necessary and a welcome step forward.

LINK welcomes the addition of the 'our waters' theme as one of four themes as ultimately the success of the marine tourism industry depends on healthy Scottish seas. While we welcome this as a key theme, it fails to acknowledge the reality that our seas face unprecedented threats – from climate change to pollution and overfishing. Marine tourism both relies on, and can contribute to, waters being 'clean and blue' and there is an opportunity for the strategy to make a stronger connection between the two.

Is the balance in the themes correct?

LINK welcomes the inclusion of 'our waters' as a theme but question the decision to combine the natural environment with the development of infrastructure and facilities. LINK asserts that as the marine environment is fundamental to the marine tourism industry it warrants a dedicated strategic theme and action plan focused on protecting and improving the natural environment. In order for Scotland to be truly "world leading", and as the strategy itself states, marine tourism must play a "unique role as a custodian and champion of some of Scotland's most valuable natural capital".

Whilst LINK recognise that "developing sensitive and sustainable destinations" with appropriate consideration of the environmental impacts of infrastructure development is important, we question its relevance to the theme of "our waters". Addressing the impacts of dispersal and over-tourism through the development of destinations and contribution to rural regeneration is highly relevant to "our people and communities".

Are the connections to wider strategy clear?

Yes

Do you agree with the outcomes?

Our Waters

LINK members welcome the production of a 'sector net-zero plan' as a key outcome of this theme. Climate change and overfishing are the largest threats to the marine environment and with greater public awareness and focus on the climate crisis, ambitious action is essential for the industry to thrive in the future.

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Biodiversity loss, although appropriately included as a critical factor in how ‘tourism is changing’, is not reflected in the outcomes. The long-term effects of climate change on the environment and species distribution should also be considered; for example, with changing/warming sea conditions, breeding seasons and timings of migratory species may change (e.g. Salvadeo *et al.* 2013)¹, which may affect commercial and recreational wildlife tourism. Additionally, the focus on ‘natural capital’ throughout this section highlights nature primarily as a commodity to the industry which doesn’t appear to align with the stated values “we value, enjoy, protect and enhance our environment”. The outcomes and suggested actions should better reflect these values for example; promoting Scotland as an ethical, ‘clean seas’ tourism destination, set targets to eliminate single-use plastics, initiatives which minimise wildlife disturbance, recommendations and commitments to reduce vessel noise pollution, involvement in marine biological recording initiatives such as Whale Track, run by the Hebridean Whale and Dolphin Trust (HWDT).

Our People and Communities

LINK considers that the first outcome under ‘our people and communities’, which currently focuses on water sports, should be adapted to incorporate a broader range of activities including those that connect people with nature without getting on the water, such as wildlife watching/recording, coastal walking. There are a number of projects run by LINK partners which support this outcome including the Hebridean Whale Trail, established by HWDT, the Scottish Dolphin Centre and Shorewatch, run by Whale and Dolphin Conservation (WDC), Snorkel Trails run by Scottish Wildlife Trust and wildlife sightings and Beachwatch projects organised by the Marine Conservation Society.

Is there anything missing?

Marine wildlife is a noticeable omission from the strategy, which is a huge selling point for marine tourism to Scotland. Cetaceans in particular serve as charismatic flagship species underpinning many financially important ecotourism activities in the region. Whale watching generated an estimated £3.7 million in indirect revenue from an estimated 51,200 whale-watching passengers on vessels operating on Scotland’s west coast in 2015². Dolphin watching in the Moray Firth is estimated to generate a further £4 million per year for the local economy³. Marine wildlife should be included in the strategy, perhaps in the ‘our waters’ theme.

There are sustainable opportunities for whale and dolphin watching (on and off shore) and for Scotland to be a world-leader in this lucrative area, if managed within environmental limits. These opportunities may increase if the Scottish Government designate and appropriately manage nature conservation

¹ <https://cibnor.repositorioinstitucional.mx/jspui/bitstream/1001/1345/1/PUB-ARTICULO-2098.PDF>

² The value of tourism expenditure related to the east of Scotland bottlenose dolphin population: final report <https://www.researchgate.net/publication/317284576> The development and value of whale-watch tourism in the west of Scotland

³ The Value of Tourism Expenditure Related to the East of Scotland: <https://abdn.pure.elsevier.com/en/publications/the-value-of-tourism-expenditure-related-to-the-east-of-scotland->

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Marine Protected Areas (MPAs) in the Sea of Hebrides, North East Lewis and Southern Trench for cetaceans and basking sharks in 2020.

LINK members can advise on the development of a world-leading marine wildlife watching strategy. Our collective work can support such an outcome through programmes such as the Hebridean Whale Trail, and Whale Track led by HWDT; Shorewatch and the Scottish Dolphin Centre, run by WDC.

Best-practice guidelines on minimising issues around disturbance are published in the Scottish Marine Wildlife Watching Code (SMWWC) and the WiSe accreditation scheme provides a national standard, widely used in Scotland by the commercial wildlife-watching industry, which should be encouraged for recreational marine users and tourists. However, voluntary codes are not adequate as a measure in isolation because they provide no oversight on levels of activity. Therefore, options around a licensing system (local or national) should be explored. Implementing licensing would enable government to monitor and manage the number of commercial wildlife watching vessels, require training to ensure legislative requirements are understood by operators to prevent disturbance and would help to ensure Scotland upheld a “world class” and responsible industry. The SMWWC recommends the development of local management to address the cumulative impacts of repeated encounters with marine wildlife in hotspots of activity and sensitive areas such as MPAs.⁴

Do you have any comments on the section ‘strategy into action’?

LINK members have raised concerns in the past about rapid, unregulated growth of the commercial wildlife watching sector. We would welcome a Giant Strides action plan that recognises the pressures of growth ambitions on the natural environment and sets out actions to monitor and prevent impacts.

LINK members would welcome the opportunity to contribute to the future development of an ambitious action plan, particularly for the ‘our waters’ strategic theme, that maximises the benefits for the marine environment and Scotland’s marine wildlife.

It is also worth noting other policy processes may drive an increase in marine tourism, such as implementation of MPAs (e.g. Kenter *et al.* 2013⁵) and potential inshore fisheries restrictions (see the Scottish Government commissioned report ‘Management Of The Scottish Inshore Fisheries; Assessing The Options For Change’⁶).

⁴ A Guide to Best Practice for Watching Marine Wildlife:

<https://www.nature.scot/sites/default/files/2017-06/Publication%202017%20-%20A%20Guide%20to%20Best%20Practice%20for%20Watching%20Marine%20Wildlife%20SMWWC%20-%20Part%202%20-%20April%202017%20%28A2263517%29.pdf>

⁵

https://www.researchgate.net/profile/Jasper_Kenter/publication/259265454_The_value_of_potential_marine_protected_areas_in_the_UK_to_divers_and_sea_anglers_UK_National_Ecosystem_Assessment_interim_report/links/0a85e530c75dc6e25d000000/The-value-of-potential-marine-protected-areas-in-the-UK-to-divers-and-sea-anglers-UK-National-Ecosystem-Assessment-interim-report.pdf

⁶ <https://www.gov.scot/publications/management-scottish-inshore-fisheries-assessing-options-change/>

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What further information do you need to be able to support and invest?

LINK members seek clarification as to how the strategy will be implemented, which body/organisation holds the responsibility for its delivery, and what the role of the Scottish Government is in this strategy. How is the growth ambition and potential pressure on the marine environment and marine wildlife to be managed and regulated?

This response was compiled on behalf of LINK Marine Group and is supported by: Hebridean Whale and Dolphin Trust, Marine Conservation Society, Scottish Wildlife Trust and Whale and Dolphin Conservation.

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