



National Marine Plan Review 2021

Scottish Environment LINK comments.

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.

Scottish Environment LINK members welcome this opportunity to provide feedback on the 2021 review of the National Marine Plan. In the context of the intertwined climate and nature crises, the urgent need for a green recovery from the Coronavirus pandemic and the concerns and declines in species and seabed status set out in Scotland's Marine Assessment 2020, LINK members believe that transformative change is urgently needed in how we manage activities on, under and surrounding Scotland's marine environment. A renewed National Marine Plan must drive urgent ocean recovery and restoration at scale, providing an excellent opportunity for Scotland to lead the world.

Have we considered the right set of “relevant matters”?

Broadly yes, recognising the major impact of climate change, Covid-19 pandemic and EU exit and the importance of integrating with the Blue Economy Action Plan and the Future Fisheries Management strategy.

Is there anything we have missed?

We welcome the aspiration to “Improve Marine Biodiversity and Environment” in the Blue Economy Action Plan and the need to adopt the principles of ecosystem-based fisheries management in Scotland's Future Fisheries Management strategy. The recovery of marine habitats and species across their range, and enhancement of the ecosystem services they provide, must be at the core of both strategies within the framework of a renewed NMP that improves the ecological health of Scotland's seas. This will require transformational change in MPA network management, nature and climate positive fisheries management, improved protection for Priority Marine Features across their range, increased investment in ocean restoration and establishing legally binding targets for the recovery of nature on land and sea.

Crucially, further to the post-2020 biodiversity framework set to be agreed at CBD COP15 later this year, **a replacement NMP should therefore incorporate actions arising from the EU Biodiversity Strategy for 2030, noting in particular proposals for legally binding nature restoration targets across land and sea and the commitment to “strictly protect” at least one-third of protected areas (10% of land and 10% of sea).** We interpret strictly protected to be akin to the IUCN definition of “fully” protected, whereby no extractive or destructive activities are allowed, and all impacts are minimised¹.

The replacement NMP should also establish the framework for identifying and implementing marine nature-based solutions (NbS) to the climate emergency, defined by the IUCN as “actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously providing human well-being and biodiversity benefits”. LINK members are contributing to identifying solutions. For example, the Scottish Wildlife Trust's “Oceans of Value” project in Orkney has begun

¹ The IUCN MPA guide. Available at https://wdpa.s3.amazonaws.com/MPA_guide/MPAs_English_4pp.pdf



investigating the potential of NbS; the Marine Conservation Society is co-founder of the award-winning Dornoch Environmental Enhancement Project (DEEP) returning native oysters to the Dornoch Firth and has published with Rewilding Britain a report recommending a co-ordinated blue carbon strategy²; RSPB Scotland has pioneered managed realignment in Nigg Bay and holistic coastal management in Inner Forth Landscape Initiative and LINK Marine Group members have collectively set out a detailed Ocean Recovery Plan.

Scotland is of global importance for blue carbon³. A significant and exciting opportunity to pioneer blue carbon protection and enhancement, driven by a renewed NMP, integrating with Blue Economy Action Plan, Future Fisheries Management Strategy and future Climate Change Plans for Scotland should therefore be embraced. To enhance marine biodiversity, seafood provision and blue carbon status and extent, a minimum 10% of the sea being strictly/fully protected⁴, as part of a wider 30% of the sea area that must be highly protected⁵, is an absolute cornerstone of ocean recovery. Within this approach, it is important to ensure that strong management and protection of the environment is considered throughout the remaining 70% of sea area in keeping with the three-pillared approach to marine nature conservation. We note the importance of General Policy 9 which could be further strengthened among other policies.

Do you agree that these matters and their impact on the management of coexisting activities in the marine environment point to the need to begin work to replace the NMP?

Yes. We recommend an ambitious timetable for a replacement NMP that reflects the urgency of the nature and climate emergency. Aiming for adoption by end of 2022 would maximise the chances of being able to implement the transformative changes required to achieve time-bound nature recovery and net-zero targets.

² [BlueCarbon_Report.pdf \(mcsuk.org\)](#)

³ [Protecting the global ocean for biodiversity, food and climate | Nature](#)

⁴ Interpreted using the IUCN of “Fully Protected”, whereby “no extractive or destructive activities are allowed, and all impacts are minimised”, see also the IUCN MPA guide. Available at https://wdpa.s3.amazonaws.com/MPA_guide/MPAs_English_4pp.pdf

⁵ Defined by the IUCN as, “only light extractive activities are allowed, and other impacts are minimised to the extent possible”, see also the IUCN MPA guide. Available at https://wdpa.s3.amazonaws.com/MPA_guide/MPAs_English_4pp.pdf

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- Whale and Dolphin Conservation
- WWF Scotland

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