



MarPAMM-Argyll MPA Management Plan Public Consultation

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 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. This consultation response was written by LINK's Marine Group.

Response

Guiding Principles

Five guiding principles were developed in order to support the development of MPA management in Argyll.

Five Guiding Principles

- 1 - Early engagement is essential
- 2 - Be transparent to build trust
- 3 - Establish and maintain good communications with clear, jargon free resources
- 4 - Be consistent but remain flexible
- 5 - Evaluate approach and celebrate success

To what extent do you agree or disagree with the guiding principles?



Strongly disagree Disagree **Neutral** Agree Strongly agree

Comments

Please add any additional comments you may have on the guiding principles

LINK members naturally agree with the guiding principles as stated above but note that they are so high level and all-encompassing as to be impossible to disagree with. Engagement of stakeholders, trust, transparency, and good communication are key guiding principles to our democratic processes and should go without saying. LINK members believe that wording of the guiding principle should be more precise and ambitious to meet the scale of the Climate and Nature emergencies. Addressing the twin climate and biodiversity emergencies should be mentioned as a guiding principle of developing MPA management measures.

1- Early engagement is essential

LINK members support meaningful participation of stakeholders in the early stages of the decision-making process and think more precise wording would be helpful. More details about how representation is captured is also needed. This principle needs to clearly reflect inclusivity and involvement that goes beyond standard consultation approaches in the decision-making processes. This should include demographics representative of civil society, including coastal communities of place, stakeholders with local marine livelihoods as well as young



people and communities of interest. Ideally the system should enable or empower community (of place and interest)-driven stewardship of MPAs and ensure that benefits are felt locally. A plan of engagement should be set out at the start of the process, and it should make clear how and when there are opportunities to input.

2- Be transparent and build trust

LINK members feel this would be more precisely worded. How does the process intend to ensure transparency? Transparency of information used in decision-making supports good governance and can help to avoid or address conflict (Archibald *et al.* 2021). Steps should be taken to build stakeholder trust in the MPA decision-making process to ensure that outcomes are agreeable and fair, while achieving primary ecological and climate-related objectives. This can and should include (but not be limited to):

- timely and open publication of science and evidence
- setting out clear expectations and intended outcomes
- frequent interaction and communication between decision-makers, scientists and stakeholders
- incorporating local knowledge and values

3 - Establish and maintain good communications with clear, jargon free resources

This is inseparable with principles 1 and 2. Jargon-free resources in addition to publication of technical assessments and background documents are important, particularly for under-represented voices such as young people and members of society not familiar with the detail of conservation decisions and processes. Good communication is an essential facet of engagement, transparency and building trust.

4 - Be consistent but remain flexible

This guidance would benefit from greater clarity. Does the consistency and flexibility refer to the approach to MPA management? This principle alludes to adaptive management, which is already an intention of management measures adopted within MPAs. This must not be used to over-ride the precautionary principles, a requirement of s.13 of the [UK Withdrawal from the European Union \(Continuity\) \(Scotland\) Act 2021 \(legislation.gov.uk\)](#). There must be consistency in terms of how the MPA is set up and managed (i.e. deliver on legal requirements, align with international standards and commitments) but there must be scope to incorporate new information, or changes to criteria and guidelines.

Does it mean for example being consistent with the MPA objectives of contributing to the protection and recovery of the marine environment, but flexible through the implementation of an adaptive management approach, e.g. responding to new evidence?

5 - Evaluate approach and celebrate success

How do you define success? How do you evaluate approach and success? Evaluation must consider environmental and socio-economic factors. There needs to be a clear understanding of what success looks like to manage expectations of stakeholders. For the recovery of some ecosystems and habitats, this may take many years, and often decades. There also needs to be consideration and agreement to the baseline this is defined against - e.g. to what level of ecosystem recovery do MPAs seek to contribute; how many jobs related to the MPA and ecosystem services are desired?

Evaluation and success relate back to transparency and trust - there should be a commitment to keeping stakeholders informed of progress and where things have not gone to plan, to ensure they remain engaged in the process.

References

D.W. Archibald, R. Mclver, R. Rangeley (2021) Untimely publications: Delayed Canadian fisheries science advice limits transparency of decision-making. *Marine Policy*, Volume 132, 104690
<https://doi.org/10.1016/j.marpol.2021.104690>.



Objectives and Recommendations Overview

Over the past three years we have been working with the MarPAMM-Argyll Steering Group (see [here](#) for a full list of members) and engaging with wider stakeholders to better understand the opportunities and challenges of Argyll's MPAs. Through these discussions a number of **objectives** and **recommendations** have been developed for Argyll's MPAs. The objectives and recommendations fall under four topics:

- Objective topic 1 – Biodiversity and Climate Change
- Objective topic 2 – Socioeconomics
- Objective topic 3 – Knowledge, Awareness and Collaboration
- Objective topic 4 – Governance and Management

Over the next 4 pages you will be asked:

- To what extent you agree or disagree with each objective;
- To rank the recommendations that have been put forward in order of priority;
- If you have any additional comments.

Objective Topic 1 - Biodiversity and Climate Change

Objective 1.1 Achieve the conservation objectives set for the MPAs in the Argyll Marine Region.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 1.1. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 Undertake a review of what pressures and impacts are being monitored within Argyll's MPAs, identify the gaps and where pressures might increase in the future.
- 2 Undertake studies to understand what the cumulative impacts are of activities taking place within Argyll's MPAs.
- 3 Develop guidance on how to assess cumulative impacts for all activities taking place within Argyll's MPAs.
- 4 Identify potential new citizen science projects.

Objective 1.2 Contribute towards Scotland achieving international commitments, conventions and agreements

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 1.2. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 Undertake a study to better understand how Argyll's MPAs contribute to net-zero objectives (e.g. blue carbon habitats).
- 2 Communicate how Conservation and Management Advice documents for MPAs help to deliver international commitments.

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3 Make data and reporting to international commitments more visible and accessible.

Objective 1.3 Maintain and enhance the biodiversity in Argyll's MPAs helping make its sea healthy and resilient to climate change whilst recognising that some species and habitats may adapt and species interactions may change.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 1.3. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1- Identify habitat enhancement/restoration priorities for Argyll.
- 2- Produce a list of features that will be at risk due to climate change and therefore what MPAs are most at risk (this should consider direct and indirect effects and carbon stores/carbon sequestration).
- 3- Undertake a study to understand how the features of Argyll's MPAs are linked/connected to other MPAs and the wider marine environment and how this might change in the future.
- 4- Undertake a study to better understand how Argyll's MPAs contribute towards Scotland's biodiversity.
- 5 - Prioritise regional marine planning in Argyll.
- 6- To have better integration with river basin and terrestrial planning.

Objective 1.4 Reduce direct environmental threats to biodiversity, prioritising the main pressures identified for Argyll in the Scottish Marine Assessment 2020.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 1.4. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1- Undertake studies to understand what the cumulative impacts are of activities taking place within Argyll's MPAs.
- 2- Develop guidance on how to assess cumulative impacts for all activities taking place within Argyll's MPAs.
- 3- Identify key partners to share information with, develop working arrangements on information flow and identify mechanisms to reach external marine users.
- 4- Encourage marine users to undertake relevant training or certifications (e.g. WiSE Scheme for tour operators)
- 5 - Disseminate information on threats and mitigation methods.
- 6- Undertake horizon scanning to identify future threats.



7 - Share mitigation success stories.

Objective 1.5 Support the restoration and enhancement of MPA features through community-led projects.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 1.5. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 Identify restoration and enhancement priorities for Argyll.
- 2 Encourage funding with realistic timescales for delivering restoration and enhancement projects.
- 3 Explore a licensing route for restoration and enhancement projects.
- 4- Assist community-led groups with linking with other marine users in order to collaborate.
- 5 Publicise the ecosystem services and associated benefits enabled by the projects.
- 6 Undertake a study to better understand the environmental history of the region to gain better insight on how it compares to today and the future evolution of the sites (e.g. through the Old Statistical Accounts).

Comments

LINK supports the objectives and recommendations under topic 1. An ecologically coherent network of properly protected Marine Protected Areas is a vital tool to help set our seas on a path of recovery, as part of the three-pillared approach to marine nature conservation in the Marine Nature Conservation Strategy, contributing to the intertwined climate and nature crises. We believe achieving conservation objectives should be the priority of MPA management. Putting our ocean on a path to recovery, will help achieve net-zero (cf. carbon capture by marine habitats and seabed). Its fundamental thinking must change, from simply protecting the pockets of less disturbed or damaged seabed habitat that are left, to using MPAs as tools to contribute to active recovery of Scotland's marine biodiversity.

We agree with the 1.1 objective and recommendation on understanding cumulative impacts of activities taking place within Argyll's MPAs and develop guidance on how to assess them. The protection of Scotland's inshore environment, and support for its valuable ecosystem services, is vital in the context of addressing the intertwined climate emergency and nature crisis and requires urgent, bold and transformative change. The implementation of an ecologically coherent network of MPAs which are well-managed under the OSPAR convention, aligning with the ecological principles of representativity, adequacy (size of site), viability, connectivity, replication, protection level and best available science, is therefore crucial, and a legal requirement under the Marine (Scotland) Act 2010.

We agree with the recommendations under objective 1.3 "undertaking a study to understand how the features of Argyll's MPAs are linked/connected to other MPAs and the wider marine environment". We see it as an opportunity to consider the whole site and ecosystem-based approach to the management of MPAs. Management of activities within and outside MPAs must enable the recovery of Scotland's seas through a holistic ecosystem-based approach for the protection and recovery of PMFs as part of the wider ecosystem, including all life history stages and ecological linkages. A greater understanding of the capacity of the marine



environment to accommodate current levels of human activities/industries is crucial to informing management measures going forwards. We referred to this specifically in the Future Fisheries Alliance-led response to the Future Catching Policy consultation:

<https://www.scotlink.org/wp-content/uploads/2022/06/FFA-response-to-Scotlands-FCP-Consultation-updated.pdf>

LINK members suggest adding “recover” to objective 1.3 so that it is “ Recover, Maintain and enhance the biodiversity in Argyll's MPAs helping make its sea healthy and resilient to climate change whilst recognising that some species and habitats may adapt and species interactions may change.”

We agree and support objective 1.4 and recommendation to reduce and mitigate direct environmental threats within the MPA. A collaborative approach with all stakeholders is therefore essential to achieving protected area objectives, to ensure that activities are sustainable and operate within environmental limits and to build support among stakeholders and wider society.

We agree with objective 1.5 to support restoration and enhancement projects. LINK members think, however, that there could be a risk by specifying projects are “community-led”. This could limit the development of restoration projects if the community does not have the capacity to “lead” the project. We suggest rewording the objective to “ensure there is community collaboration and support, and where possible leadership”. LINK members think that more details are needed for the recommendation “Assist community-led groups with linking with other marine users in order to collaborate”. Will any training or guidance be required or are community groups likely to have the skills and knowledge to deliver restoration and enhancement projects?

Objective Topic 2 – Socioeconomics

Objective 2.1: Understand how ecosystem services provided by the MPAs in Argyll can contribute to the socioeconomics of the region (e.g. carbon sequestration, storm damage, genetic resources, health and well-being etc.).

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 2.1. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 Map linkages between ecosystem services and socioeconomic benefits of sustainable marine activities (jobs, investment, supply chain etc.)
- 2 Undertake a study that quantifies the blue carbon habitats that exist within Argyll's MPAs.
- 3 Extract the key messages provided in the conservation and management advice documents on ecosystem services provided by each MPA in Argyll and make this information more visible.
- 4 Research UK and global examples that could be applied to Argyll.
- 5 Identify potential new citizen science projects.
- 6 Explore how seafood that is caught within Argyll's MPAs could obtain MSC blue label status.



Objective 2.2: Activities that take place within the MPAs in Argyll should be activities that are compatible with the conservation objectives and management advice set for the MPAs.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 2.2. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1- Undertake studies to understand what the cumulative impacts are of activities taking place within Argyll's MPAs.
- 2- Ensure management advice is up to date and accessible.
- 3- Undertake a study to evaluate the capacity of the MPAs in Argyll under different scenarios.
Flexible and proportionate regulatory systems that facilitate innovation (e.g. technology changes).
- 4- Horizon scanning for new activities to ensure they don't pose risk.
- 5- Develop guidance on how to assess cumulative impacts for all activities taking place within Argyll's MPAs.
- 6- Share success stories of sustainable development/activities.

Objective 2.3: Promote cooperation and provide support to businesses that are transitioning to environmentally sustainable activities that help to support the equitable use of a common resource and where the economics from such activities are maximised in Argyll.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 2.3. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1- Flexible and proportionate regulatory systems that facilitate innovation (e.g. technology changes).
- 2- Promote good examples

Comments

LINK supports objective 2.1. Well-managed MPAs can support and enhance ecosystem services that benefit regional economies and marine activities such as tourism and, due to the "spillover effect" if truly protected, sustainable fishing. Communicating on these benefits is therefore essential to build support among stakeholders and wider society. LINK recently published results of an opinion poll¹ gauging the views of Scots on the health of the marine environment. The results demonstrate wide support for stronger protection of Scottish MPAs and highlights the perceived or aspirational positive effects of well-managed MPAs on local economies.

¹ <https://www.scotlink.org/scots-support-strong-protection-for-their-seas/>



We strongly agree with objective 2.2. It is essential that marine activities occurring within MPAs are operating within environmental limits, are economically viable and that if there is any doubt the precautionary principle is applied and activities precluded unless and until they can be proven to be sustainable. As mentioned under topic 1, we welcome the recommendations to assess cumulative impacts for all activities taking place within Argyll's MPAs.

As stated in Future Fisheries Alliance and LINK response to the Future Catching Policy consultation², and LINK response to the FFM discussion paper³, we believe a comprehensive and transparent review should be undertaken of marine activities, and an assessment of whether activities are compatible with operating within environmental limits. It is crucial to ensure that only marine activities that enhance the marine environment operate within Argyll MPAs, or indeed the entirety of Scotland's MPA network.

We agree with objective 2.3 to support businesses that are transitioning to environmentally sustainable activities. If we are to meet the scale of the nature and climate crises, we urgently need to transform the way we manage and use our seas. We think the wording of objective 2.3. "*to support the equitable use of a common resource and where the economics from such activities are maximised in Argyll.*" could be clearer. Conservation objectives should be the absolute priority in the management of nature conservation MPAs. Activities should only operate within their environmental limits and if they are compatible with the conservation objectives. Similarly, we think more information is needed regarding the recommendation "*flexible and proportionate regulatory systems that facilitate innovation (e.g. technology changes).*" What does "flexible regulatory system that facilitate innovation" involve?

Objective Topic 3 - Knowledge, Awareness and Collaboration

Objective 3.1: Every person in Argyll and every visitor is aware of the MPA network, its purpose and the benefits of MPAs.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 3.1. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 - Develop an MPA awareness programme/campaign under two different streams (i) those that work within MPAs (ii) general public.
- 2- Provide Argyll and Bute Council with information on MPAs that can be added to their website.
- 3- Develop a communications and marketing strategy for MPAs to help disseminate information (including social media).
- 4- Make information on Argyll's MPAs clearer and more accessible through the consistent updating and promotion of the Experience Builder.
- 5- Create new information resources, e.g. interpretation boards at view points and on CalMac ferries.

² <https://www.scotlink.org/wp-content/uploads/2022/06/FFA-response-to-Scotlands-FCP-Consultation-updated.pdf>

³ https://www.scotlink.org/files/documents/SELINK_FFM_FINAL_120719-1.pdf



6- Develop a logo to make MPAs and the programme work more identifiable.

Objective 3.2: Help communities reconnect and celebrate their maritime and cultural heritage.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 3.2. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 - Identify existing resources that exist on maritime and cultural heritage.
- 2- Produce information materials and resources about maritime and cultural heritage and make available online, in shared spaces and in schools. The information should focus on both past and present activities.
- 3 - Encourage Gaelic language initiatives and cultures in resources.
- 4- Encourage traditional methods of boating (e.g. under sail and oar).
- 5- Encourage local groups to adopt Historic MPAs under the Nautical Archaeology Society's "Adopt A Wreck" scheme.

Objective 3.3: Increase awareness of marine issues particularly those raised in the Scottish Marine Assessment 2020 for Argyll.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 3.3. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1- Incorporate marine issues into MPA awareness programmes and communication/marketing strategy.
- 2- Produce summary materials on how activities are regulated.
- 3- Make information on appropriate reporting mechanisms more visible through the promotion of the experience builder and communication/marketing strategy.
- 4- Establish links with nationwide projects that tackle marine issues (e.g. marine invasive ID training, ghost fishing etc.) and identify any gaps that exist.
- 5 - Produce a regional biosecurity plan.

Objective 3.4: Build and maintain partnerships and collaboration across appropriate stakeholder groups.

To what extent do you agree or disagree with the above objective?

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Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 3.4. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1- Build on and maintain the governance structure established by MarPAMM-Argyll to form a permanent balanced working group (with terms of reference, bi-annual meetings and overview of membership benefits) that would help to establish a regional marine planning partnership.
- 2- Use of hybrid/online tools to maintain/increase engagement between local people and government.
- 3- Undertake a stakeholder mapping exercise on a yearly basis.
- 4- Establish links and good working relations with neighbouring regions to enable consistent management and data sharing.

Comments

Please add any additional comments you may have on the above objectives and recommendations. LINK members welcome topic 3 and recommendations to raise awareness on the MPA network and the marine environment. Enhancing stewardship and collaborative approaches are key to ensure wide support for MPA, foster a sense of ownership, and increase compliance with management measures.

On objective 3.3, we suggest increasing awareness of marine issues and marine ecosystem services, in order to celebrate and communicate the benefits the marine environment brings to our society and well-being.

Translation of awareness-raising materials into Gaelic is very important for Equality, Diversity and Inclusion (EDI).

Objective Topic 4 - Governance and Management

Objective 4.1 Clearly define: The framework for selecting, consulting, designating and managing MPAs; The MPA network, including what lies in and outwith the network and how they link; The roles of organisations in the management of MPAs.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 4.1. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 - Develop a framework that will set out the process for any new designations and how they will fit into the context of the current network (including HPMAAs).
- 2- Develop a communications and marketing strategy for MPAs to help disseminate information (including social media).
- 3- Develop a series of infographics that clearly outlines the above processes.



Objective 4.2: Ensure that governance arrangements are flexible, respectful and balanced so that stakeholders across the region are appropriately engaged and good working relationships are established and maintained across stakeholder groups.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 4.2. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

1- Build on and maintain the governance structure established by MarPAMM-Argyll to form a permanent balanced working group (with terms of reference, bi-annual meetings and benefits).

2- Establish a process that allows wider stakeholders to provide input and feedback.

Objective 4.3: Management should be reviewed on a regular basis to allow for timely reaction to new evidence.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 4.3. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

1- Establish an adaptive management framework that integrates outcomes from monitoring and stakeholder feedback to review management and report recommendations for adjustment where appropriate. The framework should set out clear timeframes and include considerations on socioeconomic impacts.

2- Establish a process for timely stakeholder engagement should management changes be imminent.

3 - Provide open access to marine licencing and coastal planning decisions impacting on the area.

Objective 4.4: To have effective compliance and adequate enforcement of management measures through a combination of resources, technology and local guardianship.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 4.4. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

1 - Increase resources within Marine Scotland Compliance to ensure there is sufficient resources to enforce management measures.

2- Work with companies to develop downloadable MPA maps of boundaries and restrictions so they can be viewed on navigational aids as well as publicise the existence of data available for fishing plotters by Kingfisher.



- 3 - Install marker boundaries for MPAs where appropriate and install/update signage with key information.
- 4 Organise an annual enforcement exercise to improve coordination between national and local resources.
- 5 Make information on appropriate reporting mechanisms and how to report concerns more visible through the promotion of the Experience Builder and communications/marketing strategy.
- 6 Establish better links to terrestrial planning and regulation of upstream activities.
- 7 Create a public webpage/portal that summarises compliance actions and outcomes.
- 8 Celebrate/promote good examples of management, compliance and outcomes.

Objective 4.5: Monitoring of MPAs that integrates both statutory and community based monitoring.

To what extent do you agree or disagree with the above objective?

Strongly disagree Disagree Neutral Agree Strongly agree

Recommendations

The below outlines the recommendations that could be put in place that would help to achieve objective 4.5. Please rank the recommendations in order of priority, with the highest priority being placed at the top (1).

- 1 Ensure adequate resources are available to Government agencies responsible for monitoring.
- 2 Develop a regional monitoring strategy that identifies (i) what monitoring is being undertaken, (ii) the strategic priorities, (iii) how the gaps could be filled (e.g. through community monitoring/citizen science projects) and (iv) timescales.
- 3 Develop a list of data already being collected by marine industries/users.
- 4 Scope how marine users (e.g. recreational boaters) could collect data and establish MOAs.
- 5 Develop Memorandum of Agreements (MOAs) between community groups and other marine users for monitoring projects.
- 6 Update Sitelink to include information on monitoring including dates of when monitoring has happened, when monitoring is next due to take place and any reports.

Comments

Link members broadly agree with topic 4 and recommendations of encouraging participation in decision-making for areas valued by communities. However, we would welcome greater clarity around the recommendations for establishing governance and management (in particular under objectives 4.1 and 4.3). There is an existing framework for selecting and designating MPAs in Scotland underpinned by conservation legislation (e.g. the Marine (Scotland) Act 2010). A framework for the implementation of HPMAs is also currently being developed. Does this topic recommend developing a new regional framework to replace or complement the national approach? Such a framework could be developed through a Regional Marine Planning approach (as part of which MPAs should be integrated anyway) and should align with existing and proposed policy implementation, including the cap on inshore fishing, committed to in the Bute House Agreement, and should support achievement of the outcomes of the Blue Economy Vision through the Blue Economy Action Plan.



LINK members agree that management of MPAs should be ecosystem-based and science-led, taking into account cumulative impacts within and outside the sites. MPAs must first and foremost support the enhancement of ecosystem service benefits and improve intrinsic biodiversity quality and value and ecosystem function. We must move beyond the anachronistic notion of MPAs as simply static spatial measures to protect the best examples of remnant features much diminished in range and extent compared to their historic status, to one where they are seen as tools, integrated with the wider fabric of marine management, that are fundamental to actively help drive the recovery in quality and extent of representative species and habitats and the ecosystem services that they support. This requires recognising that many of the designated features of the MPAs, and other features that can be provided consequential protection, support vital ecosystem service “stacked benefits” including, but not limited to, carbon sequestration and storage, provision of critical fish and shellfish habitat, coastal protection and contributing to ecosystem resilience.

A collaborative approach with all stakeholders is essential to achieving protected area objectives, ensuring that activities are sustainable and operate within environmental limits, and to building support among stakeholders and wider society. We agree that successful engagement must include improved stakeholder participation with clear expectations, wider strategy and support mechanisms for affected activities, use of best available science and independent scientific scrutiny of proposals. However, the legal requirements to protect the MPAs and ensure that they contribute to wider ecosystem recovery and enhancement must be the principle driver of purpose and management.

We agree with recommendations under objective 4.1. Developing a communication strategy is important to raise awareness of the ecosystem service benefits of properly protected MPAs, and encourage a sense of stewardship in wider society. Developing infographics that outline MPAs and the decision-making process would be useful.

We believe objective 4.2 needs to be clearer on what "flexible governance arrangements" mean and would look like in practice. We agree that the governance structure established by MarPAMM Argyll was a successful and balanced working group and support the recommendation to maintain and build on it for future governance of Argyll MPAs. Governance arrangements must be inclusive and representative of marine interests, communities of place and communities of interest.

LINK members welcome recommendations under objective 4.3 to regularly review the management process and measures. Adapting to the best available science and a quickly changing environment is crucial if we are to match the scale of the climate and nature emergencies. This relies on comprehensive ecological monitoring and reporting, transparent and timely publication of new scientific evidence, and improved monitoring of industries, such as through the roll out of REM with cameras across the entire Scottish fishing fleet.

However, we think that a recommendation about the integration of outcomes from scientific research and monitoring, not just stakeholders’ feedback and considerations on socio-economic impacts, would be useful. We strongly support objectives 4.4 and the related recommendation to increase resources within Marine Scotland Compliance. In the [Ocean Recovery Plan](#), LINK members ask for increasing the public budget for marine conservation, including long-term marine monitoring programmes and MPA management plans. The Ocean Recovery Plan also asks for robust enforcement such as fines for environmental damage to encourage best practice.

Further details would be needed on objective 4.5 on how both statutory and community-based monitoring would be integrated and the data collected assessed.

Additional questions

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During the process of setting a vision for Argyll's MPAs it was identified that some recommendations may help deliver a number of objectives.

To what extent do you agree or disagree with the following statements?

	Strongly disagree	Disagree	Neutral	Agree	Strongly agree
A dedicated officer that acted as a coordinator/contact point/ranger for the MPAs in Argyll could achieve a lot of the recommendations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assessing cumulative impacts is a top priority	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A series of working arrangements for information dissemination is required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A long term communication and marketing strategy and the production of materials for MPAs is required	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q1 :a dedicated officer : strongly agree

Q2 Assessing cumulative impact as top priority: strongly agree

Q3 Series of working arrangement for information dissemination: agree

Q4 Long term communication and marketing: agree

Is there anything you feel is missing or have anything further you would like to add?

LINK members would be interested in knowing how MarPAMM will engage with the forthcoming consultations on MPA management measures (offshore and inshore sites), and Highly Protected Marine Areas. Can the data collected from monitoring and assessment work contribute to these processes?

The Highly Protected Marine Areas selection process will allow third-party proposals. Could MarPAMM support third-party proposals in the Argyll area?

We would also welcome further information on how relevant agencies and authorities intend to take the MarPAMM project recommendations into account.



This response was compiled on behalf of the Marine Group and is supported by: Fidra; Marine Conservation Society; National Trust for Scotland; Whale and Dolphin Conservation; WWF Scotland

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Scottish Environment LINK the voice for Scotland's environment



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