



National Marine Plan 2 Strategic Environmental Assessment (SEA) Scoping Report

October 2023

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 marine group.

1. Response

Question 1

Do you have any comments on either the environmental topic areas or assessment methodology proposed? The proposed scope, including the relevant environmental topic areas, and assessment methodology are set out in Section 3 of SEA Scoping Report.

LINK members are overall supportive of the proposed environmental topics to be considered in the SEA, and the inter-relationships between them. Considering a precautionary approach is in line with international directives and recommendations (e.g. SEA Directive, HELCOM-VASAB EBA guidelines). More clarity on how the precautionary approach will be applied in practice is necessary.

LINK members welcome the consideration of cumulative impacts and ecosystem-scale impacts.

LINK members believe the proposed methodology needs updating. The current proposal relies on the NMP1 SEA objectives, and does not reflect the drastic changes and impacts from climatic factors from 2015 and 2023. Additionally, the proposed approach for building the assessment framework lacks an iterative and transparent process involving stakeholders before final approval.

Question 2

What are your views on the broad policy framework and is there any further information that you feel should be considered?

The broad policy framework included in this Scoping Report identifies the broader policy context and environmental protection objectives relevant to the plan that is being assessed (Policy Framework – section 2). This will be used to inform the assessment process.



LINK members broadly agree with the policy framework. However, we recommend to include the Nature Conservation (Scotland) Act 2004 in the policy framework.

We also notice the omission of fisheries management measures for commercial fisheries. Commercial fisheries are a key stakeholder in the marine environment, and we believe management measures should be scoped into the policy framework.

Moreover, the policy framework should include the Scottish Government's commitment to keeping pace with EU environmental protection objectives, including the EU 2030 Biodiversity Strategy's objectives.

Question 3

Is there any further information or data that you feel should be considered as part of the environmental evidence base for the assessment?

The proposed evidence included in this Scoping Report will be used to inform the assessment process (Environmental Baseline – section 2).

LINK members agree with Scotland's Marine Assessment 2020 being used as primary evidence base for the SEA, but recommend the evidence base should be updated with best evidence available (e.g. State of Nature Report 2023).

Question 4

What are your views on the early work set out in the report to identify key environmental issues that will be used to inform the development of SEA Objectives for assessment (SEA Objectives - Section 3, Table 1)?

LINK members broadly agree with the key environmental issues listed. Under 'Soil (Marine geology, sediments, and coastal processes)' the first bullet point should aim to reduce the impact of bottom-contact activities with the potential to disturb the seabed and cause habitat loss, not simply limit current levels of damage.

Are there any additional environmental issues that should be considered in the assessment?

Chemical pollutants and other legacy pollutants like PCBs are not listed as environmental issues despite affecting Scotland's seas on many levels. For example, Lulu, one of the west coast community killer whales, had the highest burden of PCBs recorded in the species, 80 times higher than the accepted PCB toxicity threshold for marine mammals.

Similarly, pharmaceuticals are not mentioned as an environmental issue in the consultation documents. LINK members recommend considering them as a pressure in the SEA environmental issues. Pollution of marine and coastal ecosystems by pharmaceuticals can negatively affect aquatic life by impacting their growth, behaviour, reproduction and survival.

Bycatch, entanglement and underwater noise are also not mentioned, despite being an issue in Scottish waters, particularly for cetaceans. For example, the latest research from the Scottish Entanglement Alliance estimates that 6 humpback and 30 minke whales are becoming entangled each year in the Scottish creel fishery. For the west coast of Scotland the estimated fatal entanglement rate was 2.3% of a recent abundance estimate,



suggesting a risk of localised depletion. LINK members think these issues need to be listed as an environmental issue.

Question 5

What are your views on the SEA Objectives used to assess National Marine Plan (2015), (SEA Objectives – Section 3, Table 2)?

These objectives will be revisited as part of the development of methodology for the SEA for NMP2.

LINK broadly agrees with the SEA Objectives listed in the consultation document. However many of the terms in the objectives are subjective and there's a lack of clarity as to what definition is going to be used and how they will be measured. This needs clarifying in partnership with stakeholders prior to drafting policies. For example, how will the value or special qualities of landscape be defined, what activities at what levels would constitute a threat to the protection of these?

In order to tackle the intertwined climate and nature crises, LINK members believe that the restoration of marine ecosystems throughout Scotland's marine area, ensuring all human activities operate within environmental limits and are robustly monitored and appropriately regulated, should be at the core of NMP2. The new marine plan will need to drive ocean recovery, and the SEA objectives should reflect that.

On the topic "Biodiversity, Flora and Fauna", in the midst of an ocean emergency, the objectives must go beyond "safeguarding" the marine ecosystems and emphasise the need for greater ambition to enhance, recover and restore marine ecosystems.

Question 6

Do you have any further comments on the SEA scoping report?

No further comments

This response was compiled on behalf of the Marine Group and is supported by:

Marine Conservation Society, Hebridean Whale and Dolphin Trust, Scottish Wildlife Trust, Whale and Dolphin Trust, RSPB Scotland, National Trust Scotland

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