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Environment  
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24<sup>th</sup> June, 2025

Gillian Martin, MSP,  
Cabinet Secretary for Climate Action and Energy.

Dear Cabinet Secretary,

Thank you for your considered response of 1<sup>st</sup> May to our letter of April 1st, and for outlining the ongoing work to complete fisheries management measures within Scotland's inshore Marine Protected Areas (MPAs), as well as efforts to safeguard Priority Marine Features (PMFs) outside MPAs. We recognise the Scottish Government's commitment to stakeholder engagement and to undertaking the required statutory processes in the development of these measures.

However, we respectfully disagree with the language you used in your letter suggesting that Scotland has already achieved the global 30x30 biodiversity target simply by *designating* 37% of our seas as MPAs: "37% of our seas are now designated as MPAs, exceeding the global biodiversity target to achieve MPA coverage of 30% of global seas by 2030". While the extent of spatial designation is important, it requires implementation of management measures to enable conservation objectives to be achieved. Area-based targets such as 30x30 are fundamentally about ensuring *effective* protection and *ecological recovery*, not just achieving coverage on paper<sup>1</sup>. Under the Marine (Scotland) Act 2010, the Marine and Coastal Access Act 2009, the UK Marine Policy Statement, and international commitments such as OSPAR, the Scottish Government has a legal and policy obligation not only to designate but to ensure that Scotland's contribution to the UK MPA network is well-managed and ecologically coherent, which requires effective regulation of damaging activities and demonstrable progress toward conservation objectives.

A network of MPAs can only deliver on its conservation objectives if harmful activities, such as bottom-towed fishing gear use on sensitive habitats, are managed in line with ecosystem-based principles. We acknowledge your comments regarding the remaining fisheries management measures still required across many sites in the MPA network, including the work underway to finalise proposals for inshore areas and the progress following the 2024 consultation on offshore MPA management. The analysis of responses and your commitment to implementing offshore measures in 2025 are important steps forward. However, while necessary, these steps alone are not sufficient to demonstrate the full delivery of a well-managed and ecologically coherent MPA network. Effective management is essential, and must include regulation of harmful activities, ecological connectivity across inshore and offshore environments, and integration with broader spatial planning objectives.

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<sup>1</sup> <https://iucn.org/sites/default/files/2023-09/30x30-target-framework.pdf>

These elements are critical if Scotland is to claim credible progress toward the 30x30 target under the Global Biodiversity Framework.

The Global Biodiversity Framework makes clear that effective, inclusive, and equitable management, alongside ecological principles like connectivity and representativeness, are essential for area-based measures to count toward this goal. These conditions are not yet fully met in Scotland's MPA network meaning the real protection achieved in Scotland is significantly less than 37%; the majority of Scotland's MPAs score 0 on the World Database of Protected Area's "management effectiveness evaluations".

The designation of MPAs is *the starting point, not the end goal*. While the implementation of fisheries management measures in the most vulnerable sites in 2016 was a necessary first step, the completion of the remaining management measures for inshore MPAs and high-risk PMF areas is long overdue. Management measures for inshore MPAs and PMFs must be developed to tackle direct threats from fisheries and pressures from other sources if these designations are to achieve their intended outcomes. For instance, an [estimated 30 minke whales](#) die each year due to entanglement in the Scottish creel fishery. Off the west coast, this level of mortality puts minke whales at risk of localised depletion.

In keeping with the three-pillared approach to marine nature conservation, these measures must also be integrated within a broader, adaptive, and ecosystem-based approach to marine management. The measures must actively link conservation objectives with the Inshore Fisheries Management Improvement process, Blue Carbon Action Plan, the Scottish Biodiversity Strategy, and be embedded within National and Regional Marine Plans and Scotland's contribution to the Programme of Measures to achieve Good Environmental Status. The Global Biodiversity Framework makes clear that such policy integration is a necessary condition for area-based measures to qualify as contributing to the 30x30 target. We also note the UK Government's recent announcement at the 2025 UN Ocean Conference consulting to further prohibit bottom trawling in 42 MPAs in English offshore waters. We would welcome clarity on the Scottish Government's position in relation to this commitment, and whether a similar approach will be taken for Scotland's offshore MPAs.

Well-managed MPAs must also be understood as a cornerstone of a just transition to a more sustainable and equitable fishing industry. There is sufficient evidence that healthy marine ecosystems support more stable, resilient and profitable fisheries in the long term, safeguarding livelihoods and food security for future generations. A well-managed marine environment is not a barrier to economic opportunity, but rather it is its foundation. This requires a paradigm shift in how we manage our seas, moving away from short-term exploitation and the acceptance of a degraded baseline, and instead embracing policies that actively restore ecological function while supporting coastal communities. We believe there is still significant progress needed to embed these principles into Scottish marine conservation and management policies.

In light of these concerns, and to support the credibility and effectiveness of Scotland's marine conservation efforts, we believe there are two important steps the Scottish Government should take to demonstrate clear and accountable progress towards a well-managed MPA network and delivery of the 30x30 target. First, we respectfully ask that the Scottish Government is more transparent in communicating progress towards a well-

managed network of MPAs and avoids conflating the extent of designation alone with the achievement of the 30x30 target. Second, to support clarity and accountability, it would be helpful for the Government to publish its interpretation of the 30x30 target in the marine context, including the specific criteria and indicators it will use to assess whether area-based measures at sea genuinely contribute to this commitment under the Global Biodiversity Framework.

We trust these reflections are received in the spirit intended, that of constructive engagement, and we would welcome any opportunity to support further dialogue on achieving shared goals for Scotland's seas. We look forward to the offshore MPA measures and publication of inshore MPA and PMF fisheries management proposals.

Yours sincerely,

**Scottish Environment LINK's Marine Group and the Our Seas coalition**

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