Marine Strategy Part One: UK updated assessment and Good Environmental Status Consultation

August 2025

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 organisations, 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

1a) To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of the state of UK seas? What else, if anything, would be valid to include?

The updated assessments provide only a partial and generalised reflection of the state of UK seas. While some descriptors are broadly correct in identifying environmental pressures, the report fails to reflect the distinct challenges faced in Scottish waters and does not adequately capture the condition of ecosystems at a regional scale. In Scotland, significant data gaps persist, particularly for non-quota shellfish stocks, benthic habitats, underwater noise, and chemical contaminants in finfish. These omissions severely limit the robustness of the assessment.

Major pressures such as the cumulative impacts of fishing and offshore energy development are not fully represented. To improve the accuracy of future assessments, a more regionally disaggregated approach should be taken, integrating data from Scotland's marine regions and considering community-based and citizen science monitoring efforts. The role of climate change in driving ecological change also requires much stronger emphasis, and the role of bycatch as a pressure on seabirds needs to be monitored and managed within future GES Assessments.

LINK member the Marine Conservation Society provides data for the beach litter indicator through a subset of the Beachwatch project. Beachwatch is a national citizen science survey that follows the OSPAR beach litter monitoring protocol. We would recommend an extension to the size of the subset

of beaches monitored for the beach litter indicator suitably supported through funding including at least one Scottish island.

1b) To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of progress toward Good Environmental Status? What else, if anything, would be valid to include?

The assessments broadly reflect the lack of progress toward achieving Good Environmental Status (GES), including within Scottish waters, where only two out of fifteen indicators have been met. However, they fall short of offering a clear account of the reasons for failure and do not include adequate timelines or action plans to recover lost ground. In Scotland, while some policies and plans are in place, such as Marine Protected Areas and the Fisheries Management Strategy 2020-2030, implementation remains slow and enforcement weak, particularly in relation to fishing pressures and marine litter. Critical pressures such a bycatch, which is one of the most significant human induced pressures on seabirds, remains unassessed in the UK Marine Strategy. Other pressures such as climate change, invasive mammal predation, HPAI, and benthic degradation are under assessed or inadequately managed. Data gaps, weak governance and insufficient resourcing limit recovering actions.

The report would benefit from greater transparency around missed legal targets, especially the 2020 GES deadline, and more explicit articulation of how existing and future policies will contribute to closing the gap. Without clearer recovery trajectories, the assessment lacks utility as a guide for action.

2) Do you agree with the revised overarching targets (also known as characteristics) we have set for GES? If not, what would you change?

While the revised overarching targets reflect a more refined and targeted framework for GES, they lack sufficient ambition and legal precision to drive meaningful action. In the Scottish context, targets must be explicitly aligned with legal obligations under the Marine (Scotland) Act 2010 and the commitments of the National Marine Plan. Several targets, particularly those related to fish and shellfish, rely too heavily on achieving maximum sustainable yield (MSY) rather than adopting a truly ecosystem-based approach. Targets on marine litter focus primarily on end-point outcomes (e.g. levels of beach litter) rather than addressing inputs and sources.

The revised targets largely omit resilience to climate change and the need to restore ecological functions. A stronger set of targets should reflect not only the ecological state of marine systems but also their role in climate mitigation, including through the protection of blue carbon habitats. Critically, all targets should be time-bound, measurable, and clearly enforceable, and with long-term dedicated funding for monitoring data gaps.

3a) To what extent are the proposed criteria to be used in the next assessment cycle sufficient to guide progress towards achievement of GES?

The proposed criteria are not yet sufficient to guide progress toward GES, particularly when viewed through the lens of Scotland's marine context. While the inclusion of certain biological and physical indicators is welcome, the current criteria do not fully integrate the interactions between different pressures and ecosystem components. For example, the impact of fishing on benthic habitats and food webs is not adequately captured across related descriptors.

The criteria do not explicitly account for climate change or ecosystem resilience, which are fundamental to long-term marine health. Cumulative effects, such as the combination of offshore development, fishing, and pollution, are also poorly represented. Without such integration, the criteria risk leading to siloed policy responses that fail to address the systemic nature of marine degradation. The next assessment cycle must fill monitoring and delivery gaps. Without effective monitoring, it is unknown the extent that management measures are helping achieve conservation goals. The proposed criteria must ensure it distinguishes between MPA designation and effective management and monitoring, as designation alone is not an effective measure of progress.

3b) To what extent are the proposed targets to be used in the next assessment cycle sufficient to guide progress towards achievement of GES?

The proposed targets for the next assessment cycle are not sufficient to drive meaningful progress toward GES. In Scotland, the current pace of policy delivery is too slow to meet the ambition required, and many targets are neither ambitious nor detailed enough to support effective implementation. For instance, the targets for commercial fish and shellfish stocks continue to be based on MSY principles, which do not adequately account for food web integrity or long-term ecosystem functioning. Bycatch reduction targets are vague and lack enforceable timeframes, despite the clear evidence of population-level impacts on species such as harbour porpoise.

Marine noise targets remain underdeveloped, and no thresholds have been adopted for impulsive or continuous sound. Furthermore, there is no clear mechanism to link the targets to Scotland's broader environmental frameworks, including the Biodiversity Strategy to 2045 and the Just Transition to Net Zero. Targets must be reformulated to include regional specificity, ecosystem resilience, and clearer obligations for implementation.

As mentioned above we would recommend extending the number of beaches funded to monitor for beach litter following the OSPAR protocol. The updating or creation of national marine litter strategies across the UK focussing on targets for prevention and support for clean up would be a welcome addition. We would also like to see a target to reduce microplastics in the environment from sediments to surface waters with improved monitoring introduced.

3c) To what extent are the proposed indicators to be used in the next assessment cycle sufficient to guide progress towards achievement of GES?

The proposed indicators are insufficient in their current form to reliably guide progress toward GES. While there have been some improvements, for example, in relation to marine mammal indicators, key areas remain neglected or poorly developed. In particular, indicators for underwater noise lack clear thresholds and do not reflect the full range of impacts from offshore wind, shipping, and construction. The indicators for non-indigenous species have been weakened compared to previous versions, despite ongoing biosecurity challenges in Scottish ports.

There are no indicators to capture the cumulative effects of human activities or to assess the resilience of ecosystems in the face of climate change. In Scotland, where ecosystem-based management is a statutory requirement, new indicators should be developed to assess the condition of carbon-rich habitats like seagrass beds and saltmarshes, the effectiveness of Marine Protected Areas, and the integration of nature-based solutions into offshore development planning. Without these additions, the indicator suite remains too narrow to support an ambitious and holistic approach to GES.

4a) Do you feel that there are any policy gaps? If so, please identify the gaps and explain how these could be filled.

There are several critical policy gaps that must be addressed to achieve GES, particularly in Scotland. We firmly disagree with the statement on page 17 of the consultation paper: "We have now completed our 'ecologically coherent network' of MPAs." While the network of Marine Protected Areas is well developed in terms of designation, there remains gaps in feature representation and replication (legally required of the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009) and effective management, monitoring, and enforcement, including regarding the regulation of bottom-towed fishing gear in sites with sensitive benthic features. Scotland has not yet fully implemented fisheries management measures in its offshore MPAs and many of its inshore sites.

Fisheries management policies also fail to adequately cover non-quota and data-limited stocks, which are ecologically significant and widely harvested in Scottish waters. We would also like to see anadromous fish, such as the endangered Atlantic salmon, taken into account.

Underwater noise regulation is effectively non-existent, with no thresholds or licensing conditions to manage noise in sensitive habitats such as marine mammal Special Areas of Conservation.

While Scotland has made progress on marine litter, source-based interventions (such as tackling abandoned fishing gear and microplastic pollution) remain limited.

The consultation offers no assessment, and no indicator data on bycatch - simply marking this status as not assessed. Bycatch is widely recognised as one of the most significant pressures facing seabirds and this lack of data and monitoring of bycatch represents a major gap in understanding the health of Scottish and UK seas for seabirds and other marine wildlife. The use of Remote Electronic Monitoring (REM) with cameras on all vessels is a vital step to address this significant pressure along with effective mitigation measures.

As many management powers are devolved, including environmental responsibilities and fisheries management, the UKMS must therefore be flexible enough to allow for regionally tailored indicators and delivery pathways, while maintaining a coherent UK-wide framework.

Finally, Scotland lacks strong policy frameworks to protect and restore blue carbon habitats, which are vital for both biodiversity and climate mitigation. These gaps must be closed through integrated marine planning and cross-sector policy alignment.

4b) Do you feel that there are any evidence gaps? If so, please identify the gaps and explain how these could be filled.

Yes, there are numerous evidence gaps that undermine the ability to assess and achieve GES, particularly in the Scottish context. Non-quota shellfish stocks, which are economically and ecologically important, are not adequately monitored, leading to uncertainty about their sustainability and the impacts of harvesting. The extent and impact of bycatch on seabirds, cetaceans, non-target fish such as wild salmon and seals remain under-documented, in part due to limited monitoring coverage, especially in small vessel fleets. Data on contaminants in finfish are incomplete, limiting assessments of food web health and human health risks.

Underwater noise exposure data are sparse, and there are no systematic assessments of cumulative noise exposure in high-risk areas.

Evidence on the condition of benthic habitats, particularly outside MPAs, is limited, as is information on the impacts of nutrient enrichment and climate-driven changes to pelagic ecosystems. These gaps can be addressed through a comprehensive Scottish marine monitoring programme, expanded remote electronic monitoring, investment in new technologies such as eDNA and autonomous surveys, and stronger coordination with international data-sharing platforms, including OSPAR and ICES.

Significant gaps in Scotland's MPA network must be addressed, including some benthic features (spiny lobster, heart cockle aggregations, the burrowing anemone *Arachnanthus sarsi* and replication of fan mussel aggregations) and for mobile species such as seabirds and marine mammals in particular, which remain inadequately protected. Seabirds are facing ongoing declines, with several species showing significant population losses, yet their critical foraging areas at sea are still underrepresented in the existing network. A marine sufficiency review is needed to assess whether existing MPAs (including SPAs and SACs) adequately protects marine mammal and seabird populations and their habitats, ensuring the MPA network supports the recovery and resilience of these species. This would highlight key areas needed to support seabird and cetacean survival, supporting more efficient and effective Marine Spatial Planning that avoids the areas of highest sensitivity for seabirds and cetaceans. However, this must not come at the expense of progressing and implementing effective management measures for existing sites, which remains an urgent priority.

This response was compiled on behalf of LINK Marine Group and is supported by: Atlantic Salmon Trust, Marine Conservation Society, Scottish Wildlife Trust, RSPB Scotland

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