



Scottish
Environment
LINK

5 Atholl Place
Perth

PH1 5NE

T: 01738 630804

E: enquiries@scotlink.org

W: www.scotlink.org

John Swinney, MSP

First Minister for Scotland

Scottish Parliament

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

15th January, 2026

Dear First Minister,

Marine Protected Areas fisheries management needed early in the next Parliament.

We are writing to express our deep concerns and immense frustration about the latest delay to the long-promised public consultation on fisheries management measures for inshore marine protected areas (MPAs) and for the protection of Priority Marine Features (PMFs) outside MPAs. This delay comes at a critical moment for Scotland's marine environment in the context of the global climate and nature crises, and raises fundamental questions about the transparency, robustness and credibility of the MPA process.

Marine protected areas, when properly implemented and managed effectively, are scientifically proven tools to improve biodiversity and provide numerous economic and social benefits to communities and sustainable fisheries that depend on a healthy marine environment. Marine ecosystems face intense pressures from destructive fishing practices, climate change impacts, poorly planned developments and habitat loss, and many Scottish marine species are in decline or failing to recover. Scotland's inshore waters are especially vulnerable: they include essential spawning and nursery grounds for commercially and ecologically important species, yet only a tiny fraction is protected from bottom-towed fishing gear, putting sensitive habitats like flame shell beds and seagrass meadows at risk. Without urgent, effective fisheries management in these inshore MPAs and strong protection for habitats and species more widely, we risk further degradation, failing both Scotland's international commitments on marine biodiversity and the aspirations of coastal communities who depend on healthy seas.

The timing of this latest delay is especially troubling given Scotland's commitment to protect at least 30% of its seas by 2030 ("30x30"). With fewer than 5 years remaining, further slippage in the management of MPAs significantly reduces the likelihood of achieving this target in any meaningful sense. Even where sites are designated and management measures are introduced promptly, ecological recovery takes time. The 30x30 commitment requires



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evidence not only of spatial coverage, but of ecological improvement, effective protection and a participatory approach to decision making. Continued delays therefore compound the risk that Scotland will fall short, in addition to its other international and domestic obligations, such as achieving Good Environmental Status.

We are also deeply concerned by the lack of clarity surrounding the reasons for the delay. It is unclear why any issues were not identified, addressed and communicated publicly at an earlier stage, considering the length of time over which this work has been developed and the repeated emphasis placed on the importance of scientific rigour and evidence-based decision making. The absence of a transparent explanation risks undermining confidence in the process among stakeholders.

More broadly, this latest setback highlights longstanding concerns about the way in which the MPA process in Scotland has unfolded over more than a decade. A well-managed network of MPAs was required under the OSPAR Convention by 2016, and by 2020 under the Aichi Targets adopted by Parties to the Convention on Biological Diversity. The Scottish Government has publicly committed to several deadlines for delivering a well-managed MPA network over the last decade, none of which have been met which, along with an increasingly politicised approach, erodes trust and creates uncertainty for all involved. The consequences are felt not only by the marine environment, but also by businesses and communities that depend upon healthy, productive seas. Local industries, such as fishing, require stability and clarity to plan for the future - for example, whether they should invest in their vessels or gear without knowing when MPA restrictions will be coming into play. Recent experience with offshore MPA management measures, which in several cases did not align with conservation advice from JNCC, further compounds our concerns that ecological objectives are being compromised as the process goes on.

Scottish Environment LINK remains committed to working constructively with the Scottish Government to deliver urgently needed, coherent and science-led approaches to marine protection. However, this will require greater transparency about decision making processes, a commitment to a clear and credible timeline for the consultation and renewed assurance that conservation advice, scientific evidence and the precautionary principle will be properly reflected in the management decisions. After so many years of delay to the MPA process, it is critical to emphasise that this is still just the first step to establishing a functional network of effective protected areas for Scotland's precious marine nature and safeguarding the benefits they provide to society. The MPA network must be embedded within an ecosystem-based marine planning system and align with wider fisheries management and the expanding offshore renewable energy sector to ensure a healthy marine environment that supports a sustainable blue economy and thriving coastal communities.

We urge you to **openly reaffirm the Scottish Government's commitment to delivering a robust and effective MPA network by committing to launching the consultation within the first 100 days of Session 7**, should the Scottish National Party be re-elected to government.



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Yours sincerely,

Alison Lomax, Director, Hebridean Whale & Dolphin Trust

Sandy Luk, Chief Executive Officer, Marine Conservation Society

Philip Long OBE FRSE, Chief Executive Officer, National Trust for Scotland

Anne McCall, Director, RSPB Scotland

Deborah Long, Chief Officer, Scottish Environment LINK

Harry Huyton, Chief Executive Officer, Scottish Seabird Centre

Jo Pike, Chief Executive Officer, Scottish Wildlife Trust

Chris Butler-Stroud, Chief Executive Officer, Whale and Dolphin Conservation

Lang Banks, Director, WWF Scotland

Alan Munro, Director, Young Sea Changers Scotland



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