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4th August 2026

Mark Ruskell, MSP
Convenor, Rural Affairs Committee
Scottish Parliament

Dear Mr Ruskell,

Scottish Environment LINK's Marine Group members wish to welcome you to your role as convenor of the Rural Affairs Committee and look forward to working with you and fellow committee members on key areas of marine policy. The group members were keen to highlight areas which they believe are high priority, and in particular those that require early attention and scrutiny by the members of the RA Committee.

Scotland's sea area covers almost two-thirds of the UK's, and is home to many marine species and habitats, some of which are unique to Scottish seas. The UK Marine Strategy Assessment Part 1 in 2025 showed an overall decline in the health of UK seas, with 13 of 15 indicators not achieving Good Environmental Status (GES), despite a Programme of Measures to address it. We are also seeing an unprecedented increase in the development of offshore renewables. We support offshore renewables to provide much-needed clean energy across Scotland and beyond, but the policy frameworks and consent process to avoid unintentional negative impacts on the marine environment and other sectors are lagging behind.

LINK members are keen to draw your attention to the following key priorities for the RA Committee's attention:

Public consultation on fisheries management measures for inshore Marine Protected Areas (MPAs) and the protection of Priority Marine Features

This process is now unacceptably overdue, with repeated legislative deadlines and Scottish Government commitments not met. The MPA network was designated in 2014, with fisheries management for some inshore sites adopted in 2016 and for offshore sites in 2025. However, the remaining inshore MPAs, in addition to a number of Special Protection Areas (SPAs) for seabirds, many species of which have seen unprecedented population declines in the recent years, urgently require management measures for fishing activities that risk their conservation objectives. For example, numbers of fulmars, kittiwakes, guillemots, and razorbills on St Kilda (which are all



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qualifying features of the St Kilda SPA) declined massively between 1999 and 2023, with fulmar numbers declining by 69%, kittiwakes by 84%, and guillemots and razorbills by 35%¹.

Without management measures, MPAs do not meet the criteria required to contribute to the Convention on Biological Diversity target to protect at least 30% of our seas by 2030. Furthermore, the [recent report](#) by Environmental Standards Scotland detailing the Scottish Government's failure to put in place sufficient measures to achieve Good Environmental Status for seafloor integrity, despite existing MPA protections, shows that there is still a long way to go. We would like to see the RA committee:

- support prioritisation of this process within the Scottish Parliament, and;
- scrutinise in detail the proposed management measures and consultation outcomes, once it has been completed.

Environmental Standards Scotland report on GES and seafloor integrity

The [report](#), mentioned in the point above, is the outcome of an investigation by ESS on whether current measures are sufficient to achieve GES for seafloor integrity in Scottish seas. Seafloor integrity is an indication of the condition of the seabed, its biodiversity and its role in ocean processes, with bottom towed fishing methods as one of the most widespread activities that can undermine it. The report shows that the Programme of Measures is not sufficient to achieve GES in Scotland, and LINK members are keen to see a strong response by the Scottish Government to these findings, which we believe the insight and experience of the RA Committee should support. LINK members agree that large scale spatial management of fishing, particularly in the inshore areas, stands out as the more powerful tool available to address this, yet it is persistently overlooked in fisheries management and marine planning, where trade-offs between socio-economic concerns and piecemeal policy approaches are often given primacy. We recommend the RA Committee:

- Scrutinises the findings of the ESS report and consider the gaps in policy that have led to the deficiencies for achieving GES in Scottish Seas;
- Scrutinise the Scottish Government's response to the report findings, and;
- Provides recommendations to the Scottish Government for how these findings should be responded to in a meaningful way.

Marine Spatial Plans

In Session 5, the Environment, Climate Change and Land Reform Committee led an inquiry into the progress of Regional Marine Plans in Scotland, publishing their findings in 2020. The Scottish Government's response to this report, two years on, did not fully address all the recommendations of the Committee, even going as far as to put on hold development of new Regional Marine Plans until a new National Marine Plan has been adopted. The NMP2 process is delayed now until at least 2027 and RMPs continue to be stalled, and yet offshore renewable infrastructure is still being developed at pace without these integrated frameworks to ensure this takes place within current environmental limits. We are concerned about the mismatch in pace and scale of marine activities and environmental protection that should be guided by these marine spatial plans. We would therefore like to see the RA Committee follow up on the previous ECCLR Committee's inquiry to

¹ <https://www.nts.org.uk/stories/significant-seabird-census-completed-at-st-kilda>



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assess progress made against their recommendations and provide further guidance and expectations to the Scottish Government.

With only four years remaining until 2030, the continued decline in marine environmental health means that impacts on nature and coastal communities will only intensify unless significant attention and priority are given to more holistic and ambitious implementation of marine policy. We hope that you and the RAI Committee will include these priority marine areas in your work plan.

We would be very keen to discuss further; in the past we have found it beneficial to do so in a roundtable format alongside other environment and coastal community interests and potentially in collaboration with overlapping portfolios, such as the Climate Action Committee.

Yours sincerely,



Jessica Jones

Acting convenor of Scottish Environment LINK's Marine Group
Marine Policy Manager, Scottish Wildlife Trust



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