Scottish Wildlife Trust Consultation Response
Planning Scotland's Seas -
Consultation on Priority Marine Species
November 2013

Scottish Wildlife Trust

CONSULTATION QUESTIONS

Q1. Do you agree with the recommended list of Priority Marine Features as the basis for targeting future marine conservation action in Scotland's seas?

If your response includes a suggestion to amend the list, please indicate the specific species and habitats that your comments apply to and, where possible, provide or reference any evidence or data sources which have influenced your comments.

Yes ☐ No ☒

The Scottish Wildlife Trust supports the identification of PMFs for targeted marine conservation in Scotland's seas. However, we cannot support the recommended list of PMFs due to the absence of seabird species from the selection process. We request that this position is re-considered before a final list is adopted.

We fully support the process of selection and peer review, and welcome the breadth of marine species and habitats represented (NB see additions below). However, we find it counterintuitive that seabirds were excluded from the outset and were thus never considered against the selection criteria.

It would have been beneficial for all stakeholders if this consultation exercise provided an explanation for this decision. We understand from SNH's response to external peer review that the principle reason was the range of protection initiatives already underway. However, the same case could be made for a number of the proposed PMFs (e.g. those listed under the Habitats Directive) and therefore the purpose of the omission remains unclear.

Based on the rationale for creating the PMF list we can see no logical reason to exclude seabirds. Indeed, to a layman excluding seabirds from a prioritised list for marine conservation might suggest that they are not considered priority. While we understand that action on seabird conservation is well developed, including seabirds in the PMF selection process would in our view compliment, not undermine existing initiatives. Unless reconsidered there will effectively be two lists to consider alongside each other rather than the single rationalised list the exercise is aimed at

creating.

Additions

We are concerned that kelp on infralittoral rock is underrepresented on the recommended list. These habitats play an important role in coastal protection, supporting biological communities and carbon fixing. There is currently considerable interest and activity for commercial seaweed harvesting in Scotland which could place kelp communities at risk. Interactions with marine energy devices could also raise conservation concern. Consideration should be given to:

- Sediment-affected or disturbed kelp and seaweed communities IR.HIR.KSed
- Kelp with cushion fauna and/or foliose red seaweeds IR.HIR.KFaR
- Kelp and red seaweeds (moderate energy infralittoral rock) IR.MIR.KR

General

Q2. Are there other issues that have not been highlighted in this consultation that you would like to mention?

Yes ☐ No ☒