

# Consultation response

## Response to Scottish Seabird Conservation Action Plan



04 March 2025

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### 1. Do you support the implementation of the Scottish Seabird Conservation Action Plan?

Yes

No

Unsure

The Trust strongly supports the implementation of the Scottish Seabird Action plan recognising the importance of seabirds as an indicator species for wider ecosystem health. Scotland is a special place for seabirds, with 23 of the 25 species which breed in Britain and Ireland found here, amounting to 51% of the total population. There is no denying that iconic species such as the Atlantic puffin are also a huge part of Scotland's cultural heritage.

Sadly, we are at a critical juncture for seabirds with pressures such as climate change, lack of food and human activities putting further strain on species. This is in addition to ever increasing demands for space in the marine environment and the need to decarbonise and reach net zero.

The most recent [Seabirds Count census](#) published in November 2023 highlights the urgent need for greater action for seabirds, with 70% of seabird species currently in decline.

The [State of Nature \(Scotland\) report 2023](#) shows a similarly damning picture for Scotland's seabirds with the abundance of 11 seabird species falling by an average of 49% since 1986, notably these results pre-date the impacts of Highly Pathogenic Avian Influenza, first detected during the breeding season in 2021. The report also highlights that Good Environmental Status (GES) for seabirds has not been achieved.

### 2. Do you agree that the key pressures to seabirds in Scotland are identified?

Yes

No

Unsure

There are a myriad of pressures facing seabirds, from food scarcity to climate change and the increasing impacts of disease. These cumulative pressures are often interconnected, which is why the Trust believes actions to address the twin biodiversity and climate crisis are intrinsically linked.

In 2019 the IPBES (the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services) published the [Global Assessment for Biodiversity and Ecosystem Services](#). It identified 5 direct and 2 indirect drivers of global biodiversity loss:

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### DIRECT

- changing use of sea and land
- direct exploitation of organisms
- climate change
- pollution
- invasive non-native species

### INDIRECT

- peoples disconnect with nature
- the lack of value placed on the importance of nature

The Trust believes that there are some indirect pressures which may have been missed in the plan, such as a lack of knowledge of marine issues.

In terms of direct threats such as pollution, our reserves team experience on Handa Island, which is managed by the Trust, aligns with its identification as a key pressure. Plastic pollution including fishing nets, ropes and storm debris from aquaculture make up a large proportion of the rubbish that is removed from the islands beaches every year.

### **3. Have we captured the key actions needed to deliver the vision, aims and objectives?**

Yes

No

Unsure

While we welcome this action plan, the Trust feels that some of the actions are overly vague and without clear targets there is uncertainty around how they will be delivered. In order to address the pressures facing seabirds the actions required must be part of a multi-faceted, ecosystem-based approach with stronger commitments, clearly defined targets and timeframes for delivery.

It is imperative that funding is included as a key action in its own right. Funding streams must be clear and be addressed from the outset in order to deliver the vision of this plan. Given that actions for our seabirds need to be delivered at pace we must ensure there are funding streams identified and ready to use so that the other key actions are not delayed.

We would advocate for stronger wording in some instances, particularly in relation to actions including “exploring opportunities” to more active language. Given the current state of seabird populations and

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the mounting threats we must move past exploring opportunities and into targeted action as swiftly as possible.

We must not forget the importance of the ecosystem as a whole to support larger, apex species. Healthy benthic habitats are key areas for prey species as well as having a role in carbon sequestration. Therefore an ecosystem-based approach that recognises the interconnectedness of marine environments and fosters a holistic approach to marine management and ecosystem recovery will be of great importance for all species, including seabirds. It is imperative that the government keeps pace with their commitments to properly protect sites and species within the MPA network from damaging fishing practices.

The Trust welcomes the action to “adopt strategic site selection for future marine renewable leasing rounds to minimise impacts on seabirds” and would advocate for the importance of renewable energy developments being put in the right place, so we can benefit from clean energy without impacting on nature.

We also welcome the action on “Celebrating Scotland’s seabirds”, acknowledging that Scotland’s breeding colonies are iconic and a special experience for so many, that we do not want to lose. Connecting people with the marine environment is one of the key aspects of our recently launched [Sea the Connection](#) project. It focuses on increasing people’s confidence in the marine policy space through ocean literacy. Through this project we will also be looking at new ways to share knowledge and stories, particularly through arts and cultural activity streams. We therefore support the addition of awareness raising in the action plan to increase peoples understanding and involvement in seabird conservation.

#### **4. Do you have any views on what measures we should use to monitor progress and success?**

A similar model to the one used for the Wild Salmon Strategy could be used for the Seabird Action Plan, to provide regular update reports on implementation and progress on the key actions.

We would again reiterate the need for clear funding streams from the outset, along with timelines for delivery and strengthened commitments/targets to ensure accountability and success of the action plan.

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