

Submitted to Proposal to designate Loch Carron as a nature conservation Marine Protected Area (MPA), with an associated Marine Conservation Order (MCO) Submitted on 2018-06-13 16:39:06

Questions

1 Do you support the designation of the Loch Carron Marine Protected Area?

Yes

2 Do you agree that the scientific evidence presented for the Loch Carron Marine Protected Area supports and justifies the case for its designation?

Yes

3 Do you have any comments on any aspect of the Loch Carron Marine Protected Area proposal?

Comments: FFI applauds the Scottish government for responding swiftly to the need to protect the Loch Carron flameshell and maerl habitats, and indeed more broadly in its work in rolling out a suite of MPAs within Scotland's inshore waters. A network of MPAs provide a valuable and necessary first step in protecting the country's unique and important marine habitats. However, the loss of a proportion of the flameshell bed habitat in Loch Carron in 2017 acted as a stark reminder that much more could be done to ensure effective and sustainable marine management in Scotland. This is something that many coastal community groups, conservationists and scientists have already highlighted to government.

The multiple Loch Carron flame shell beds constitute 41% of the known extent of the habitat in the UK, with the Strome Narrows considered a high quality example of the habitat with dense flame shells and complex associated communities, and numerous maerl beds also present within the site (SNH, 2018). In light of this, and considering the overwhelming community support in the area for the MPA, it would seem sensible to designate the entire loch system as a Marine Protected Area rather than a small nearshore segment. We have the opportunity currently to be ambitious with our MPAs, to give a leading example and maximise protection of Scotland's inshore waters to allow them to recover and restore to their full potential.

Recently the IUCN published details on the essential characteristics of MPAs. These were described as needing to be/have: - conservation focussed with nature as the priority - defined goals and objectives which reflect these values - suitable size, location and design that will enable conservation of values - defined and fairly agreed boundary - management plan or equivalent, which addresses the needs for conservation of the site's major values and achievement of its social and economic goals and objectives - resources and capacity to implement

FFI encourages the Scottish Government to consider the robustness of the MPA network set against these essential characteristics – there is a critical need to ensure all MPAs are adaptively managed with continuous improvement across all elements of management, and adequate and ongoing survey effort to monitor recovery.

4 Do you have any comments on the Conservation Objectives and Management Advice for the Loch Carron Marine Protected Area?

Comments: The Loch Carron MPA encompasses two proposed protected features (flame shell beds and maerl beds). Both features are considered to be under threat and declining in Scottish waters, the carbon storage capacity of maerl and flameshell beds is also significant, with Scotland's sea lochs generally having a relatively large sequestration capacity for blue carbon. FFI strongly supports the

protection afforded within this MPA and the addition of maerl as a second PMF for this site with the boundary extension south to incorporate multiple, rich maerl beds present along the coast between Plockton and Loch Alsh.

We support the conservation objectives to recover flameshell habitat and conserve maerl habitat and the related management advice to restrict demersal mobile fishing activity within the site. As per above, we would query the size of the site and encourage a more ambitious approach, considering the high biodiversity importance and strong community support for the MPA. At the very least we would encourage continued and regular surveying and monitoring of the site. Prior to 2017 the most extensive survey was the 1985 study by Smith and Hiscock (1985) and this highlights the ongoing need for adequate survey effort.

We are aware that the incident in 2017 which ruined part of the flameshell reef triggered the Cabinet Secretary to open a wider national review of eleven Priority Marine Features (PMFs), considered particularly sensitive to pressures associated with demersal fishing activities, to identify where else fisheries management is needed to ensure there is no significant impact on the most sensitive seabed habitats in Scottish waters. We support the Cabinet Secretary in this decision however draw attention to the destruction of the Loch Carron site being initially brought to the attention of officials through the activity of local divers, without which this environmental damage may not have been reported. There is a large number of community groups around Scotland's coast who hold valuable knowledge of sensitive and important habitats; we urge adequate investment into collecting this information and delivering the necessary protection to Scotland's inshore waters, before unnecessary damage occurs.

5 Do you have any comments on the draft Marine Conservation Order?

Comments: A range of fishing activities may indeed impact flameshell beds, but the damage already caused by dredgers to this habitat indicates the need for ongoing exclusion of mobile demersal gear across Scotland's sensitive inshore waters, to avoid any further destruction of this Priority Feature Habitat. FFI also considers that numerous other Marine Conservation Orders across Scotland's MPAs have been put in place over the past several years to exclude or limit the activity of mobile demersal fishing activity, we support the fisheries management delivered through this approach however do draw attention to the need to match this effort with effective compliance including upgrading of VMS and investment into enforcement resources.

6 Do you have any comments on the Business and Regulatory Impact Assessments (BRIAs)?

Comments:

7 Do you wish to submit any documentation to support your response?

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