



SSACN – RACCE Briefing for the Loch Sunart to Sound of Jura MPA

The Scottish Sea Angling Conservation Network (SSACN) is very supportive of the Scottish MPA process and congratulates the Scottish Government on many of the bold management measures placed on the MPA Network.

We have however, grave concerns over the latest management measures for the Loch Sunart to Sound of Jura MPA which appear to give priority to short term socio-economic interests over the long term conservation goals.

We believe the proposed MCOs for Loch Sunart to the Sound of Jura conservation MPA should be adopted with one crucial change and after a thorough monitoring programme, we would hope the Scottish Government would respond quickly if additional derogated areas were found to impact on common skate.

SSACN originally proposed the Loch Sunart to Sound of Jura MPA because our extensive voluntary tagging programme indicated a population of the critically endangered common skate within the boundaries of the MPA. These were considered as the last refuge population of a species that was so named because it literally was common to all European waters.

The MCO ignores Scottish Government Science

Further analysis of our data and subsequent research between Marine Scotland Science and ourselves in the paper “Site fidelity, survival and conservation options for the threatened flapper skate” (*Dipturus cf. intermedia*) suggest *that flapper skate prefer the deep trenches, but range throughout the available depth habitat and thus management should consider both deep and shallow areas. ; and that resident fish may become temporarily transient, consequently any conservation strategy should extend to neighbouring deep trenches in the Firth of Lorn, Sound of Mull and Loch Sunart where the species is known to be present.*

The introduction of the derogation area West of Scarba is of concern because it lies directly in the path of a deep water migratory route between the Firth of Lorne and the Sound of Mull. **This derogation ignores the advice in the above paper and SSACN has no doubts that bottom trawling this area will have a direct effect on the mortality of skate. The MPAs aims are to protect the common skate not kill them.**

CONCLUSION

SSACN believe removing the west of Scarba derogation would help towards the MPA achieving its conservation objectives but urge that a commitment must be made for an ongoing research programme to ascertain effects of bottom trawling in the shallow derogated waters, known to be important skate egg laying and nursery habitats.

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On behalf of the SSACN Trustees

