



Please find attached the Scottish Sea Angling Conservation's response to the 2014 Consultation on the management of inshore Special Areas of Conservation and Marine Protected Areas.

SSACN fully supports the designation and effective management of Nature Conservation Marine Protected Areas (ncMPAs) and Special Areas of Conservation (SACs) in Scottish seas and will also support those fisheries management measures which ensure an equal balance between commercial and recreational interests when addressing conservation objectives.

Apart from the Response and Respondent forms themselves we have also attached a number of documents which expand on our response, these are:

- SSACN Loch Sunart to Sound of Jura MPA response - presenting additional information for that MPA
- SSACN Luce Bay SAC Response.docx - presenting additional information for that MPA
- SNH advice to Marine Scotland on Management of fishing in Luce Bay and Sands SAC 10 June 2011 - presenting additional information for the Luce Bay MPA

In addition we would like to reiterate a few key points:

- We are extremely concerned at the level of transparency in the process as there were significant changes made to the eventual consultation document which were not openly and clearly articulated during the various workshops prior to its release and whilst yet little support and/or advice was given to the general public regarding the issues around the MPAs/SACs, officials were meeting with the mobile sector up to the 30th of January 2015.
- The management **proposals for the Loch Sunart to Sound of Jura MPA fall short** of what are required as common skate and spurdog are regularly caught by towed commercial actives out with deep water trenches.
- **Luce Bay Option 1 is fully supported by SSACN**, is the only means by which the viability of the SAC, the integrity of the Scottish Government's inshore fisheries management ensured and an equal balance between commercial and recreational interests can be achieved.
- The SAC definition for Luce Bay makes reference to the size of the Luce Bay SAC as being important to ecosystem integrity, therefore if the SAC is to be more than a symbolic gesture, the government must ensure the site is properly managed, yet by promoting Option 2 for the Luce Bay SAC, the Scottish Government appears to be ignoring all scientific advice such as that given in the SNH document attached.
- There seems to be a great discontinuity in evaluating activities within the MPAs & SACs - whilst EU environmental law says socio-economic interests should not be prioritised above compliance with EU environmental law, the Scottish Government appears to be doing that for the mobile commercial sector whilst at the same time ignoring the implications to and contributions of, the various recreational sectors.
- Over the years SSACN volunteers have consistently attended and contributed to the MPA process as we believe the sea is a shared resource; as such it is essential that its management should be inclusive ie. undertaken for the benefit of all and not based purely on the demands of the commercial sector.

- Where data is lacking and/or confidence is low, some of the proposed approaches are not sufficiently precautionary and may in some cases lead to management measures which could undermine site integrity

Overall we are concerned that the interests of many stakeholders are being ignored by some of the proposed management measures leaving the Scottish Government flying in the face of it's own evidence, common sense, scientific judgement and once more demonstrating 'lessons have not been learnt' !

If you would like any further information / clarification, then please contact us via this email address and someone will get back to you as soon as possible.

Best Regards

Steve Bastiman

For and behalf of the Trustees of SSACN.

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The Scottish Sea Angling Conservation Network

www.ssacn.org - Fish for the future.

A registered Scottish charity RegNo. SC039015

Websites - <http://www.ssacn.org> , <http://www.tagsharks.com>

Social Media - <http://facebook.com/scottishsharktaggingprogramme>
https://twitter.com/Scot_Tag_Sharks

Contact email - contact@ssacn.org

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It is recognised that a healthy marine environment makes a significant and direct contribution to four of the Scottish Government's strategic objectives – Wealthier and fairer, Smarter, Healthier, Greener and links directly to their National Outcome 12: “we value and enjoy our built and natural environment and protect it and enhance it for future generations.” SSACN's work contributes directly to these.