

SSACN welcome the opportunity to pass comment on the December proposals for the Sound of Jura to Loch Sunart MPA.

SSACN, as the original proposer of the MPA, was concerned that the proposals in the February public consultation would fail to meet the conservation objectives of protecting the skate and their habitats. After discussions with Marine Scotland, a new proposal was discussed which would protect the deep areas and the connecting corridors. The fisheries management measures published in June reflected the discussions and provided a fair basis for which to achieve the conservation objectives.

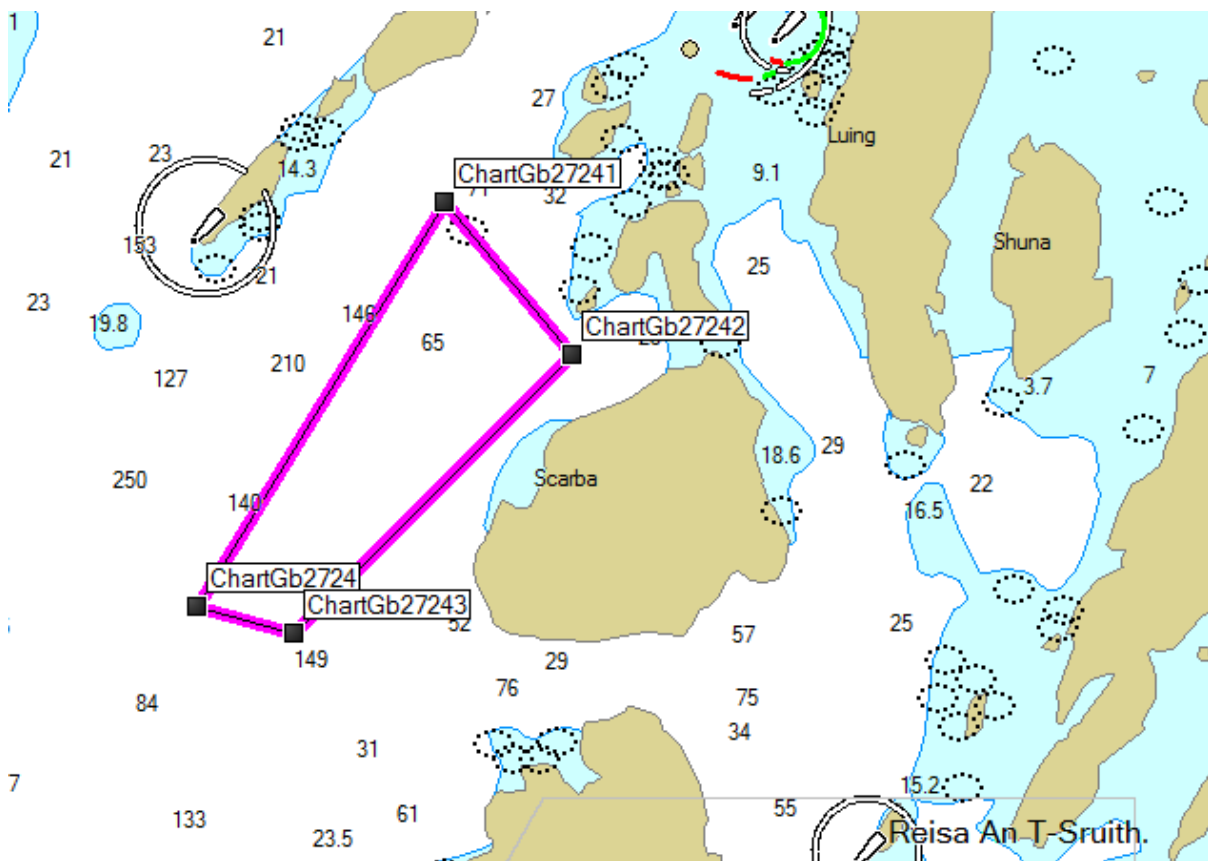
SSACN believe the December 2015 proposal is a backward and unacceptable step. The SSTP has tagging data on 59 skate that show they migrate between the four areas within the MPA. Many of these are move backwards and forward between the Firth of Lorne and the sound of Jura

We believe the additional boxes will be impossible to police but have particular concerns over two of the new boxes outlined in the December proposals.

WEST OF SCARBA

The area depicted in Fig. 1 is in the migratory path for skate and there is a strong likelihood of skate being trawled.

Fig 1

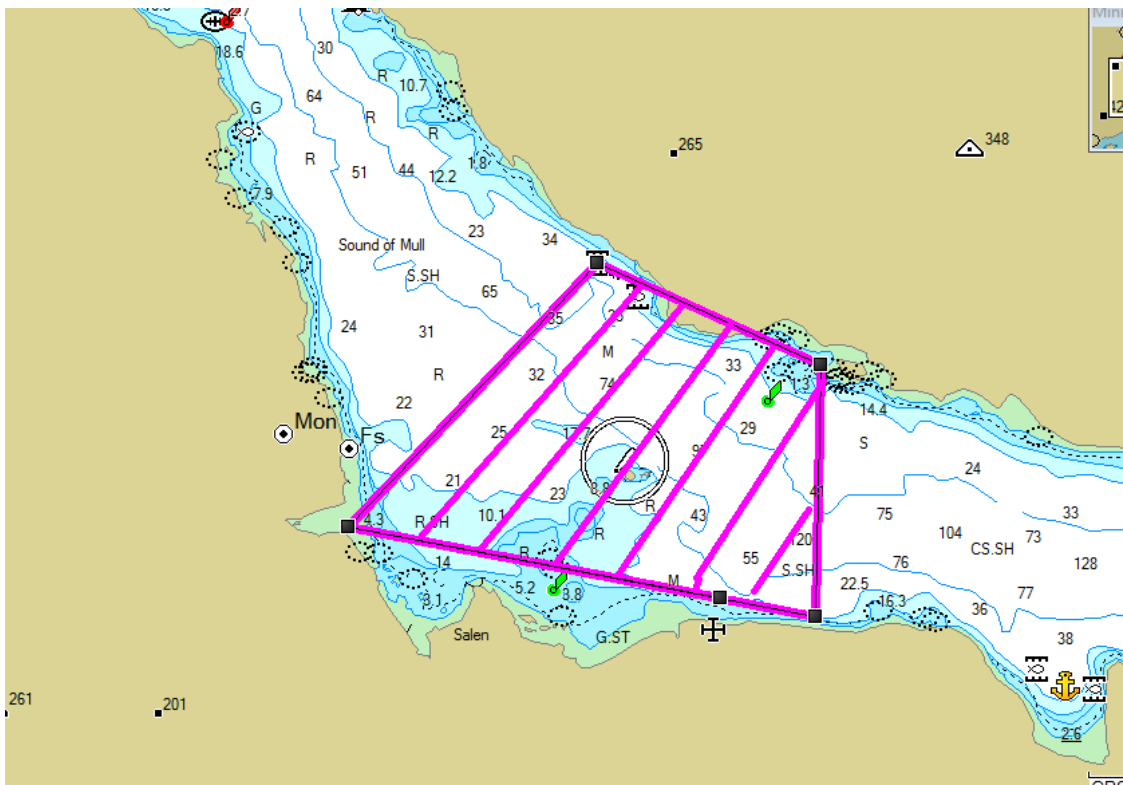


The proposal for this box goes against the Scottish Government's own science. The Marine Scotland skate paper "Site fidelity, survival and conservation options for the threatened flapper skate" (*Dipturus cf. intermedia*) suggest that flapper skate prefer the deep trenches, but range throughout the available 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.

EAST OF TOBERMORY – SOUND OF MULL

The proposed extension to the area East of Tobermory in Fig 2 in the Sound of Mull has a deep channel running through it. The SSTP tagging data shows not only strong site fidelity, but that skate also use the channel as a corridor to the Firth of Lorne. We believe this extended area will put skate populations at risk.

Fig 2



SSACN felt that the Scottish Government's June proposals had made a bold move to ensure the objectives of the skate MPA would be met. We appreciate that these proposals face fierce opposition from the Industry, but urge that the government not to back down from its conservation duties and act upon the science outlined in the MSS skate paper.