

The Highland Council

Planning, Development and Infrastructure Committee

18 February 2014

Agenda Item	22
Report No	PDI 19/15

Marine Scotland - 2014 Consultation on the Management of Inshore Special Areas of Conservation and Marine Protected Areas

Report by Director of Development and Infrastructure

Summary

This report provides details of the above consultation, and sets out the proposed Highland Council response to Marine Scotland for homologation at **Appendix 1**. It details, for the Highland area, the relevant Marine Protected Areas and Special Areas of Conservation included in the consultation, and summarises the management measures proposed by Marine Scotland. A summary of the draft Council response is included in Section 2 of this report, with the full version provided at **Appendix 1**.

Recommendation:

- that the Committee notes the content of the consultation documents and the preferred management measures for MPAs / SACs put forward in the consultation and summarised within the report; and
- that the Committee homologate the response submitted to Marine Scotland subject to any additional comments that members may agree to add.

1. Background

- 1.1 At its meeting of 6th November 2013 the Planning, Environment and Development Committee considered a response to the Scottish Government / Marine Scotland Consultation on Planning Scotland's Seas. Within this consultation were the details of proposals for a network of Marine Protected Areas covering a small proportion of Scotland's Inshore and Offshore waters. The Committee agreed to recommend that all of the proposed MPAs in Highland be designated. Scottish Government confirmed the designation of all nature conservation MPAs on 24th July 2014.
- 1.2 In responding to the 2013 consultation the Council expressed the view that there should be significant areas of the Highland coastline that were closed to mobile fishing gear and therefore protected from damage. It was felt that this would provide additional opportunities for coastal communities to take part in appropriately managed, and lower impact forms of fishing, for example prawn creeling, or scallop diving. The management measures proposed at the time closed small sub areas of the MPA's in order to specifically protect the

features of interest. The Council expressed the view that in some cases this did not go far enough.

- 1.3 Since August, Marine Scotland has been refining its approach to management of these Nature Conservation MPAs. In addition it has been looking at the existing network of Marine Special Areas of Conservation (SACs) with a view to increased management, where necessary, in relation to fisheries impacts. As part of this process officers from the Development and Infrastructure service attended a series of workshops during October 2014.
- 1.3 Marine Scotland, on behalf of Scottish Government, has recently undertaken public consultation on its preferred management options for some of the designated areas. The consultation looked at nine SACs and eleven MPAs covering inshore waters across the whole of Scotland. The views of stakeholders including the Council have been requested to help shape the final statutory measures to be taken forward to Parliamentary processes.
- 1.4 The Consultation closed on 2 February 2015. Marine Scotland has agreed to an extension in timescale for the response from Highland Council in order to allow this item to be considered by Committee. In the meantime, a draft response has been requested, and will be submitted to Marine Scotland by Friday 6 February 2015. Details of the full consultation and supporting documents can currently be viewed at <http://www.scotland.gov.uk/Topics/marine/marine-environment/mpanetwork/MPAMGT/consultation2014>

2. Highland Council response to the Consultation

- 2.1 The full draft response to the consultation on behalf of the Council is included at **Appendix 1**, and comments on the proposed management measures and the economic assessment. In some cases the response puts forward the view that the proposed measures do not go far enough, and that greater protection should be afforded to the features of interest.
- 2.2 The Consultation considers six sites in the Highlands: Loch Laxford SAC, Loch Sunart to the Sound of Jura MPA, Lochs Duich, Long & Aish SAC / MPA, Noss Head MPA, Small Isles MPA and Wester Ross MPA. The Council response has been limited to these sites.
- 2.3 Full details, including site descriptions and maps for each site, are provided in the consultation documents available on the above web link, and information on each site is summarised in Table 1 at paragraph 2.9 below. For some sites there is more than one proposed management option being consulted on. In these cases the preferred option put forward by Marine Scotland is included in the summary table.
- 2.4 The draft management options, presented in the current consultation, have been determined following studies of the potential for displacement of fishing activity within and outwith the MPA, and the likely loss of earnings of

commercial fishing interests resulting from loss of grounds for conservation purposes. They have also been informed by discussions at the workshop meetings held late last year.

- 2.5 The designation of MPAs had the potential to provide a major leap forward in terms of the conservation of our marine ecosystems, and the preservation of species and habitats. Unfortunately the management measures now proposed seem to limit the “protected” ecosystems to small isolated outposts surrounded by fishing activity, rather than a continuous network as originally proposed.
- 2.6 It is generally disappointing that the potential economic benefit to coastal communities that may occur as a result of removing fishing pressure within the MPAs, does not appear to have been considered when setting out the management options. For example, in some of our sea lochs there is the potential for increased recreational tourism, based on the attraction of fully diverse and functioning ecosystems.
- 2.7 In this regard it is worth noting that the network of MPAs and SACs represent a very small proportion of the nation’s waters. Within the Highlands only one small section, in Loch Teacuis, is proposed as a no-take zone for commercial fisheries. This further highlights the need for more stringent management measures to provide meaningful protection of the marine environment.
- 2.8 It is considered that the general thrust of the response, on behalf of the Council, is that the measures proposed do not appear to be sufficiently robust to protect species and habitats as originally intended. The draft response proposes additional measures for most of the MPA and SAC sites. The response is summarised in Table 1 below.

Table 1 – Summary of Highland MPA/SACs sites consulted on and proposed response.

Site Name and designated features	Marine Scotland Preferred Management Approach	Proposed Highland Council Response to Consultation
<p><u>Loch Laxford SAC</u></p> <p>Large Shallow Inlets and Bays, Rocky and Stony Reefs, Maerl Beds</p>	<p>Prohibit use of demersal trawls, mechanical dredge, or suction dredges (boat or diver operated) throughout SAC</p>	<p>Welcome the proposed management approach in relation to the listed mobile gears.</p> <p>Recommend that further consideration be given to putting in place measures to limit potential future fishing pressure resulting from Creel fishing. For example, close whole loch to all commercial fishing and then allow creel fishing by limited entry permit. Current low fishing</p>

Site Name and designated features	Marine Scotland Preferred Management Approach	Proposed Highland Council Response to Consultation
		pressure does not mean that fishing pressure will remain low in the face of economic changes.
<p><u>Loch Sunart to Sound of Jura MPA (Incorporating Loch Sunart MPA and Loch Sunart SAC)</u></p> <p>Common Skate, Flame Shell Beds Northern Featherstars Serpulid Aggregations Reefs</p>	<p>Prohibit use of suction dredges (boat or diver operated), long lines and bottom set nets throughout.</p> <p>Prohibit use of tickler chains on trawls.</p> <p>Prohibit demersal mobile gear (trawling/mechanical dredging) in Loch Sunart except for an identified area at the mouth.</p> <p>In Loch Teacuis, prohibit bottom contact implements including creels and anchoring. Local moorings by permit.</p> <p>Prohibit demersal trawling and mechanical dredging in two identified deep areas (one extending into shallow waters).</p>	<p>Recognise that the management measures proposed will help restrict by catch of Skate in prawn trawls.</p> <p>Recommend further restrictions in order to also conserve Skate habitat by suggesting that the opportunity be taken to extend the prohibited areas within the MPA along the Highland shore, and remove the area available to fishing within the mouth of Loch Sunart.</p> <p>Recommend that the opportunity be taken to rationalise / simplify the boundaries of closed areas to encompass a minimum number of straight lines.</p> <p>Welcome the provisions for what is in effect a “No commercial fishing zone” in Loch Teacuis in order to protect Serpulid aggregations.</p> <p>Recommend that further consideration be given to putting in place measures to limit potential future fishing pressure resulting from Creel fishing. For example close whole loch to all commercial fishing and then allow creel fishing by limited entry permit. Current low fishing pressure does not mean that fishing pressure will remain low in the face of economic changes.</p>

Site Name and designated features	Marine Scotland Preferred Management Approach	Proposed Highland Council Response to Consultation
<p><u>Lochs Duich, Long and Aish MPA/SAC</u></p> <p>Burrowed mud</p> <p>Flame shell beds</p> <p>Reefs (Biogenic, Bedrock, Stony)</p>	<p>Existing measures in place: Licence condition (implemented April 2014) Seasonal closure: Trawling/dredging may only take place between 1 April-30 September each year trawling restricted to vessels <12m using a single trawl.</p> <p>Prohibit use of suction dredges (boat or diver operated) throughout MPA/SAC.</p> <p>Prohibit demersal trawling/mechanical dredging throughout apart from derogated activities.</p> <p>Derogation: continue existing seasonal closure between 1 April-30 September</p> <p>Trawling restricted to vessels<12m using a single trawl within identified fishing area between 1 April-30 September.</p> <p>Mechanical dredging within identified fishing area.</p>	<p>Welcome provisions for the prohibition in use of suction dredges</p> <p>Recommend that the provisions for the restrictions in mobile gear should be extended to a full year closure throughout the site.</p> <p>Recommend that further consideration be given to putting in place measures to limit potential future fishing pressure resulting from Creel fishing. For example close whole loch to all commercial fishing and then allow creel fishing by limited entry permit. Current low fishing pressure does not mean that fishing pressure will remain low in the face of economic changes.</p>
<p><u>Noss Head MPA</u></p> <p>Horse Mussel Beds</p>	<p>Prohibit use of demersal trawls, mechanical dredges or suction dredges (boat or diver operated) throughout MPA.</p>	<p>Accept the measures proposed, agree to the economic assessment.</p>
<p><u>Small Isles MPA</u></p> <p>Fan mussel aggregations</p> <p>Horse mussel beds</p>	<p>Prohibit use of suction dredges (boat or diver operated) throughout MPA.</p> <p>Vessel capacity restricted to 150 GRT.</p>	<p>Welcome the proposed restrictions but highlight that the areas defined for closures are not simple shapes and that despite assurances that modern technology means that vessels</p>

Site Name and designated features	Marine Scotland Preferred Management Approach	Proposed Highland Council Response to Consultation
<p>Black guillemot Burrowed mud</p> <p>Circolittoral sand and mud communities</p> <p>northern seafan and sponge communities</p> <p>Northern featherstar aggregations</p> <p>White cluster anemone</p>	<p>Prohibit use of demersal trawls and mechanical dredges specific area (in the Sound of Canna).</p> <p>2nd phase: measures for black guillemot, northern seafan and sponge communities; possibly burrowed mud.</p>	<p>can be monitored remotely there are limitations in the recording periods which mean that vessels could potentially fish in a closed area for some time before moving out and yet remain undetected.</p>
<p><u>Wester Ross MPA</u></p> <p>Maerl beds</p> <p>Flame shell beds</p> <p>Maerl or coarse shell gravel with burrowing sea cucumbers</p> <p>Burrowed mud</p> <p>Circolittoral muddy sand communities</p> <p>Kelp and seaweed communities on sublittoral sediment</p> <p>Northern feather star aggregations on mixed substrata</p>	<p>Existing voluntary fisheries measures including no mobile gear in agreed areas around the Summer Isles in order to protect Maerl Beds.</p> <p>Seasonal closure in Little Loch Broom and Gruinard Bay (October to March each year).</p> <p>Prohibit use of suction dredges (boat or diver operated) throughout MPA.</p> <p>Vessel capacity restricted to 150 GRT.</p> <p>Little Loch Broom and Gruinard Bay seasonal closure amended to become an annual closure with different boundary.</p> <p>Prohibit use of demersal trawls or mechanical dredges within defined zones.</p>	<p>Welcome the proposed restrictions but highlight that the areas defined for closures are not simple shapes and that despite assurances that modern technology means that vessels can be monitored remotely there are limitations in the recording periods. Ultimately, vessels could potentially fish in a closed area for some time before moving out and yet remain undetected.</p> <p>Highlight a preference for larger closed areas and a year round restriction on fishing activities across a wider area of the MPA.</p> <p>Reject proposals for Scallop dredging areas to be defined by depth.</p> <p>Recommend that further consideration be given to putting in place measures to limit potential future fishing pressure resulting from Creel fishing. For example close whole loch to all</p>

Site Name and designated features	Marine Scotland Preferred Management Approach	Proposed Highland Council Response to Consultation
	No need for 2nd phase measures.	commercial fishing and then allow creel fishing by limited entry permit. Current low fishing pressure does not mean that fishing pressure will remain low in the face of economic changes.

3. Implications

3.1 Resource

The response on behalf of the Council is unlikely to have any additional resource implications for the Council.

3.2 Legal

We are not aware of any legal implications that would result from the response on behalf of the Council.

3.3 Equalities

We are not aware of any equalities implications that would result from the response on behalf of the Council.

3.4 Climate Change / Carbon Clever

The response on behalf of the Council will not have any impact positive or negative on the Climate Change or Carbon Clever targets resulting from Council operations.

3.5 Gaelic and Rural implications

The response on behalf of the Council is unlikely to have an impact on smaller inshore fishing vessels currently actively fishing within MPAs. Across Scotland as a whole, the areas designated represent such a small proportion of Scottish Coastal waters that there is unlikely to be significant adverse economic impact for the region as a whole. The possible positive rural implications resulting from the designations have not been assessed by Marine Scotland.

Recommendation

It is recommended that the Committee:

- notes the content of the consultation documents and the preferred management measures for MPAs / SACs put forward in the consultation and summarised within the report; and
- homologates the response submitted to Marine Scotland subject to any additional comments that members may agree to add.

Designation: Director of Development and Infrastructure

Date: 4 February 2015

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Background Papers: Consultation documents can be found on the following link
<http://www.scotland.gov.uk/Topics/marine/marine-environment/mpanetwork/MPAMGT/consultation2014>

2014 Consultation on the management of inshore Special Areas of Conservation and Marine Protected Areas

Consultation Questions

Loch Laxford SAC

8. Do you support the management approach for this protected area?

Yes No

The site features and conservation objectives for the Loch Laxford SAC are to maintain both the large shallow inlet and bay, and the bedrock and stony reefs features of interest. Two habitats are identified as being subject to pressure from fishing activities, these are Maerl beds and Reef and the management advice is the same for both of these habitat types. The advice sets out that pressure from towed fishing gear should be avoided, that pressure from static gear should be reduced or limited and that pressure from other fishing gears such as diver operated suction dredge should also be avoided.

The Council is supportive of the proposed measure to prohibit the use of demersal trawl, mechanical dredge or suction dredging (boat and diver operated) throughout the SAC. The Council recognises the benefit of ensuring that these activities will not prevent the achievement of conservation objectives.

The Council is uncomfortable that the opportunity is not being taken to limit creel fishing effort as advised in the management measures. Whilst it is accepted that at present static gear activity is low within the Loch Laxford SAC this is based on Scotmap data. This data is caveated with the advice that not all vessels participated in Scotmap meaning that the values are an under estimate of total fleet activity. It may therefore be the case that creel fishing pressure is already greater than currently recorded.

In addition the Council is aware that there are a number of areas within the loch that are currently less accessible to static gear than they might be due to the significant aquaculture presence within the Loch. In the event that the opportunity arises to rationalise aquaculture developments within the SAC this may potentially open up additional areas to, and increase pressures from, static gear. The Council is of the view that additional management measures should be included at this stage to restrict static gear effort in Loch Laxford in the future. Consideration could be given to closing the SAC completely to commercial fishing operations and then having a permit scheme for creel fishing which would enable fishing pressure to be timeously controlled.

9. Do you agree with the economic, social, and environmental assessments of the impact of the management approach?

Yes No

The fishery assessment in relation to static gear is based on a current low creel fishing effort which seems to be based on data from only 2010 – 2013. There is no indication whether this low level of effort is a short term trough (during a recession)

or whether there is likely to be a trend of increasing pressure within the creel fishing sector operating within this SAC. Because pressure is currently low does not necessarily mean that pressure will remain low going forward. Whilst the Council notes the provision for addressing negative effects of static gear in the event that any are found, we consider it more prudent that measures are put in place to manage adverse effects prior to them occurring rather than having to wait for damage to be caused.

Loch Sunart to Sound of Jura MPA (Incorporating Loch Sunart MPA and Loch Sunart SAC)

10. Do you support the preferred approach (number 2) for managing this protected area?

Yes No

Measures for the restriction in anchoring and mooring in Loch Teacuis in order to conserve Serpulid aggregations are welcomed. The prohibition on using long lines and bottom set nets along with the technical measure to prevent the use of tickler chains aimed at reducing the risk of accidental by-catch of common skate is also welcomed. However, whilst the Council notes the intention for a prohibition on trawling or mechanical dredging in the deep area in the Sound of Jura and the adjoined deep areas in the Sound of Mull the Council is concerned that the extent of this area closed to fishing is both unambitious, and poorly defined.

One of the key aims of this MPA is to conserve skate. Whilst preventing the use of tickler chains within the site will assist in reducing the incidence of skate becoming a by-catch it also implies that skate are present in the areas being fished. The Council is concerned that by continuing to permit the use of bottom trawls and scallop dredges within the area habitat will continue to be lost or will not have time to recover.

The Council notes that few, if any, conservation initiatives that concentrate purely on a single species work. It is widely recognised that the habitat and ecosystems within which such species dwell must also be conserved. With this in mind we would recommend that at the very least the whole of the Sound of Mull adjacent to the Highland shoreline and within the MPA be closed to all forms of mobile gear in addition to the specified forms of static gear. This would, it is considered, be justifiable in order to conserve the habitat used by the skate. From the fisheries assessments provided in support of the consultation the Council concludes that this will have a limited effect on the vessels currently using the area. Such a measure will guard against an increase in effort in this area in the future and is consistent with the approach that has been taken towards suction dredging which is not currently known to occur in the area. It is considered that given the thriving interest in diving tourism within the Sound of Mull that there will be wider economic advantages of this approach, for example avoiding damage to wrecks as a result of fishing activities.

Notwithstanding the comments above we also note that the closed area proposed is a relatively convoluted shape. At the meetings in relation to management

measures it was stated that areas could be any shape because vessel monitoring was sufficient to allow the position of any vessel relative to the line to be monitored. It is however noted both from the present consultation and the recent consultation on gear conflict that the Vessel Monitoring Systems only provide position data every 2 hours and that this may allow for vessels to fish the wrong side of a line during this period before moving back out of an area. The Council would therefore recommend that further consideration be given to preparing clearly defined boundaries easily visible from coastal landmarks in order to define closed areas. For example, in this case bay closing lines at either end of the Sound of Mull could be used.

11. If you answered no to question 10, do you support the other approach?

Yes No

As discussed above the Council is of the view that option 2 does not go far enough and this provides a greater closed area than option 1.

12. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Yes No

The Council is of the view that there are potentially greater benefits to residents and businesses connected to the Sound of Mull than have been considered within the various assessment documents.

No account has been taken of potential positive economic benefits accruing from the complete closure of the MPA to mobile fishing gear. Removal of mobile gear from the area would allow for the expansion of locally based, scallop diving and recreational diving operations as well as reducing the likelihood of gear conflicts with static gear fishermen in the area. The Council considers that there are potential benefits to the local economy which may result from the MPA designation that are not being realised by the proposed management approach. In addition there does not appear to have been any attempt made to quantify the potential for areas outwith the MPA to benefit from ecological improvements that will result from a reduction in mobile gear pressure throughout the site.

Lochs Duich Long & Aish SAC / MPA

16. Do you support the management approach for this protected area?

Yes No

The management approach for this SAC/MPA consist of prohibiting Demersal Trawling, Mechanical Dredging and Suction Dredging though out the site but there would be a derogation between 01 April and 30th September each year to allow demersal trawling by vessels less than 12m registered length using a single net or

mechanical dredging. These activities would only be permitted in the existing fishing area.

The Council supports the prohibition in the use of mobile gear throughout the site but it is unclear why the derogation allowing seasonal fishing within the fishing area should remain. In comparison with the overall size of the loch the area in which fishing is permitted is relatively small and the Council would prefer to see a full year closure covering the whole of the site. This would remove the potential for any damage to any of the designated habitats being caused by mobile fishing activities.

Again the Council is concerned that the management measures proposed are unambitious and do not provide sufficient protection for the features on the site as a whole.

In addition the Council is of the view that measures should be put in place to provide for the closure of the site to mobile fishing gear. Creel fishing effort within the site could then be managed under a permit scheme. This would serve to prevent “honeypot” effects resulting from displacement of vessels, changing economics, or increased pressure.

The Council is aware from previous involvement with the Loch Duichs, Long and Alsh SAC that adverse impacts on Horse Mussel beds within the SAC may have occurred as a result of their removal by non licenced divers. Measures should be included within the management of the site to prohibit such activity.

17. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Yes No

No account has been taken of potential positive economic benefits accruing from the complete closure of the MPA to mobile fishing gear. Removal of mobile gear from the area would allow for the expansion of locally based, scallop diving and recreational diving operations as well as reducing the likelihood of gear conflicts with static gear fishermen in the area. The Council considers that there are potential benefits to the local economy which may result from the MPA designation that are not being realised by the proposed management approach. In addition there does not appear to have been any attempt made to quantify the potential for areas outwith the MPA to benefit from ecological improvements that will result from a reduction in mobile gear pressure throughout the site.

Noss Head MPA

21. Do you support the management approach for this protected area?

Yes No

The Council recognises the importance of prohibiting the use of mobile gear within this Marine Protected Area. It also notes that there is currently limited fishing pressure in this area in any case. The Council feels that this sets a useful precedent for management of other areas where the approach has been to say that there is currently little fishing pressure so restrictions are not necessary.

22. Do you agree with the economic, social, and environmental assessments of the impact of the management approach?

Yes No

No additional comments in relation to this aspect.

Small Isles MPA

45. Do you support the preferred approach (number 2) for managing this protected area?

Yes No

The preferred approach for management of this MPA would be to prohibit the use of suction dredges, and restrict the size of vessel that can fish within the MPA to 150 Gross Registered Tonnage. In addition other forms of mobile gear would be prohibited within the yellow zone shown in in figure K4 of the maps book.

The Council is of the view that the management measures proposed are acceptable but that the area closed to mobile fishing gear is wholly unambitious, and should be significantly larger in order afford additional protection to the designated features of the site as a whole. The comment in the approaches document that further closed areas to the north of the Sound of Canna would increase the level of displacement of vessels onto the burrowed mud habitat elsewhere in the site is of significant cause for concern. Displacement of vessels increasing pressure on fishing ground within a site wouldn't be an issue if the whole of the site was to be closed to mobile gear in order to protect the extent of the burrowed mud habitat. As per its response to other MPAs the Council is also of the view that the boundaries of the closed area should be simplified in order to avoid any potential confusion with regard to the position of vessels and their proximity to closed areas.

46. If you answered no to Question 25, do you support the other approach?

Yes No

It is not entirely clear from the two approaches which provides the greater level of protection for all the designated habitats within the MPA. It appears as if approach 2 provides for a slightly greater level of protection, however the Council is of the view that this does not offer sufficient protection for the features of the site.

47. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Yes No

The assessments seem to consider only the negative impacts of displacement of vessels rather than any positive ecosystem, or socioeconomic benefits that may arise from the designation of the site.

Wester Ross MPA

48. Do you support the preferred approach (number 2) for managing the protected area?

Yes No

The preferred approach for managing the protected area is to have a capacity restriction of 150 Gross Registered Tonnage throughout the MPA, and a prohibition in suction dredging throughout the MPA. These measures are supported by the Council. Additional spatial measures which remove seasonal closures in Gruinard Bay and Little Loch Broom and replace them with year round closures but for a reduced area are welcomed in part. The Council is of the view that the year round closure area in Gruinard Bay should maintain the same bay closing line boundary as the original seasonal closure in order to simplify the boundary and aid in management.

The intention to close Loch Ewe and Loch Broom to mobile gear is welcomed as are the closed areas around the Summer Isles which seek to protect the mearl habitat but also encompass burrowed mud habitat to the west of the Summer Isles. The Council is of the view that again the way in which the boundaries have been defined is overly complicated and will be difficult to manage and would prefer to see a single, more ambitious larger area extending from the Coigach shoreline to beyond the westernmost extent of the closed area as currently drawn. All fishing within the MPA should be undertaken in accordance with a permit scheme in order to control fishing pressure of all types within the MPA and reduce the potential for a "honeypot" effect for creel fishing leading to increased pressure on this area.

49. If you answered no to Question 43, do you support the other approach?

Yes No

Proposed closed area not extensive enough and would require additional measures in the future.

50. Should static gear fisheries be restricted in the areas essential to the recovery of maerl beds and flame shell beds?

Yes No

Yes, provision should be made to limit effort via a permit scheme throughout this MPA in order to afford protection to all of the features of interest.

51. Under either approach should the Summer Isles area be zoned by depth to enable scallop dredging to continue?

Yes No

We are aware of several examples over recent years where Scallop dredgers have not adhered to depth limitations, for example in relation to the boundaries of the Sound of Arisaig SAC. The sea bed surrounding the Summer Isles area is already heavily damaged by Scallop dredging activities, and needs to be given the opportunity to recover. In our view, zoning by depth would not provide adequate protection for habitat features.

Scallop dredging is of limited economic benefit to the communities in the locale of the MPA. The local communities have considerably more to gain from the immediate, meaningful protection of the area as a whole. In many of these areas Scallop stocks can be fished in a less damaging manner by appropriately licenced shellfish divers. Excluding Scallop dredgers from the Summers Isles altogether would reduce the potential for conflict between scallop dredgers from outwith the immediate MPA area and enterprises having direct benefit to the local economy.

52. Do you agree with the economic, social, and environmental assessments of the impact of the management approaches?

Yes No

No account has been taken of potential positive economic benefits accruing from the closure of a significant proportion of the MPA to mobile gear fishing. Removal of mobile gear from the area would allow for the expansion of locally based, scallop diving and recreational diving operations as well as reducing the likelihood of gear conflicts with static gear fishermen in the area. The Council considers that there are potential benefits to the local economy which may result from the MPA designation that are not being realised by the proposed management approach. In addition there does not appear to have been any attempt made to quantify the potential for areas outwith the MPA to benefit from ecological improvements that will result from a reduction in mobile gear pressure throughout the site.