



Scottish Offshore Marine Protected Areas

Fisheries management proposals – public consultation, August-October 2024

What is public consultation? Why is it important?

A public consultation is an opportunity for members of the public to comment on plans or ideas which are being considered, and share experiences, knowledge or ideas that help inform decision-makers. This is one of the key tools you have, as advocate, to express your views and directly input on decisions. If you want to respond to a consultation, the most common way to do so is online through the Scottish Government's [consultation hub](#).

A brief recap on MPAs in Scotland

Scotland's marine protected area (MPA) network is made up of 233 sites which includes:

- Special Areas of Conservation, SACs (originally designated under European law)
- Special Protection Areas, SPAs (originally designated under European law)
- Nature Conservation MPAs, NCMPAs (designated under Scottish law (inshore, within 12nm) and UK law (offshore, beyond 12nm))
- Sites of Special Scientific Interest
- Ramsar Sites

Collectively they are known as 'marine protected areas'. The current consultation covers 20 offshore SACs and NCMPAs. The offshore area is between 12 and 200 nautical miles away from Scotland's coastline. For more information about MPAs, see LINK's [Frequently Asked Questions on MPAs](#).

In 2014, a suite of 30 new MPAs was designated. This suite included 13 offshore NCMPAs, which added to some of the offshore SACs already designated. In 2015, the Scottish Government began developing proposals for fisheries management measures in offshore MPAs and SACs in collaboration with marine stakeholders.

The measures would have been adopted through European law – the Common Fisheries Policy. The process to gain approval for the measures from European member states had begun in 2016. Then 'Brexit' happened, and the Scottish Government had to follow a different process to implement the offshore MPA fisheries management measures. We are now at the public consultation stage 8 years on from when it began. Public consultation is required for any new legal (statutory) tools to ensure Ministers are making decisions based on society's needs and wishes.



In 2020 the West of Scotland deep sea marine reserve was designated, which is a NCMPA but the entire site is off-limits to bottom towed mobile fishing (trawling and dredging) for the recovery of the many designated Priority Marine Features (PMFs) it protects.

What is being proposed in this consultation?

Fisheries activities – particularly involving bottom-towed gear, such as trawling – have been identified as a risk to the designated features the offshore MPAs are designed to protect. So, there needs to be restrictions on how they operate in these sites. There are two options broadly being presented in this consultation:

- A zonal approach, where fishing is restricted on areas where the designated feature(s) is found;
- A ‘whole-site’ approach, where bottom-towed and static fishing gear is restricted across the site to help the designated features recover and support the wider ecosystem.

Of the 20 sites, 15 have these two options, although there are some slight variations (e.g. seasonal restrictions or allowance for seine net fishing). For five of the MPAs, the ‘whole-site’ approach is the only option proposed. There are additional MPAs listed in this consultation where no further management is proposed, either because there are no current fishing activities in the area or because there is already management in place considered sufficient to achieve the conservation objectives of the site.

Examples:

- Northwest Orkney, Turbot Bank (national ban on sandeel fishing considered sufficient for sandeel protection)
- Hatton Bank/Hatton Rockall Basin (Northeast Atlantic measures in place)
- Darwin Mounds (no fishing)

A full list of the sites, their designated features, what condition they are currently in, and the objectives of the management measures are listed at the end of this document. Note, that 65% of the designated features across the 20 sites are in **unfavourable** condition, and management measures must enable their recovery.

Scottish Environment LINK’s position is that the whole-site approach should be adopted in all offshore MPAs where benthic (seabed-dwelling) species and habitats are a designated feature. We support the stronger management option (where this is proposed) and we consider that some management proposals do not go far enough (e.g. protection of sandeel habitat, not just removal of targeted fishing).



Image: Orange roughy (credit: unknown author, creative commons)

Why do we need the stronger fisheries management approach?

Climate change is significantly affecting Scotland's marine environments, with rising sea temperatures and ocean acidification threatening the very ecosystems that MPAs were established to protect. [Studies](#) have shown that healthier ecosystems are more resilient to the effects of climate change, making it essential to implement robust conservation measures.

[Scotland's Marine Assessment](#) (2020) highlights major concerns about seabed condition, showing sharp decline of biogenic (reef-forming) habitats. The [State of Nature report](#) provides compelling evidence of a significant decline in seabird populations (49% between 1986 and 2019) and seabed condition. Additionally, recent [seabird counts](#) reveal that almost two-thirds of Scotland's breeding seabird populations have declined over the past 20 years, indicating a severe loss of biodiversity. These declines are largely attributed to human activities, including unsustainable fishing practices.

The Blue Carbon Mapping Project, led by the [Scottish Association for Marine Science](#) (SAMS) on behalf of [WWF](#), The Wildlife Trusts and the [RSPB](#), just published a [detailed estimate of the amount of carbon captured and stored in UK seas](#), including Marine Protected Areas (MPAs).

The research shows that a total of 152 million tonnes of organic carbon are stored only in the top 10cm of seabed sediments in Scotland's seas. Scotland's seabed habitats could capture up to 9.5 million tonnes of organic carbon every year – **over four times the amount sequestered by Scottish forests.**



The report also reveals that the **20 offshore MPAs under consultation hold an estimated 60 million tons of organic carbon**, nearly 40% of the total organic carbon in Scotland's seas. These results add further evidence for the need to protect Scotland's seabed from physical disturbance such as bottom-towed fishing.

In this context, the zonal fisheries management proposals may not be sufficient to achieve wider ecosystem recovery and protect vulnerable offshore and deep-sea habitats. These proposals often focus on managing specific features within a site but may not adequately address the broader ecological needs of the entire ecosystem.

An 'ecosystem approach' to management is crucial to prevent collateral damage to sensitive habitats and maintain the health of deep-sea ecosystems. This approach recognises that marine ecosystems are interconnected, that humans are part of those ecosystems, and that protecting individual species or habitats is not sufficient to ensure overall ecosystem health. Cumulative impacts from various human activities, including fishing, oil and gas industries, shipping, and military exercises, can have a significant negative impact on marine ecosystems. These impacts must be considered when implementing fisheries management measures to ensure their effectiveness.

Note that trawling and dredging is already [banned below 800m depth](#) across Scotland's seas. This law was introduced in 2016. LINK's position is that this should be amended to 600m based on [scientific evidence](#).

How will these proposal impact Scotland's fishing industry?

The consultation provides a series of technical documents estimating the possible impacts, of the proposals, including potential impacts to the fishing industry and seafood supply chain. Some sites may have a greater negative impact on fishing than others. The assessments also provide the projected positive impacts to the environment of the proposals.

The Sustainability Appraisal (SA) provides valuable information on the potential costs and benefits of different fisheries management options. However, as LINK has highlighted in the past, the methods of assessment used in the SA has several limitations that hinder a full understanding of the positive and negative impacts:

- The SA does not provide information on the long-term costs to the environment, fishing industry, and wider society of **doing nothing**. The continued decline of marine ecosystems without effective management measures could result in even higher costs in the future.
- The SA fails to provide monetary values for the **estimated benefits** to fisheries, making it difficult to compare the management options effectively.



- The SA primarily focuses on the economic costs to the fishing industry, reinforcing the false notion that conservation measures equate to economic loss. In reality, **well-managed MPAs can generate long-term benefits** for both people and nature.
- The environmental benefits described in the SA are not presented in the same way as the economic costs, and are therefore **not directly comparable**.
- The SA presents the loss of fishing revenue to the Scottish economy in isolation, without considering the potential benefits that may result from wider ecosystem improvement. This can lead to biased views and a lack of understanding of the long-term impacts of MPA management.

LINK is calling for a more holistic view of the costs and benefits, considering both short-term and long-term impacts. We want to see recognition and quantification of the potential economic benefits of well-managed MPAs beyond the fishing industry. Recent research by [Costello \(2024\)](#) provides strong evidence that MPAs can have significant positive impacts on fisheries, including increased fish stocks, catch volumes, and catch per unit effort. Additionally, MPAs can generate benefits for sustainable tourism and local economies more broadly.

The Marine Conservation Society has recently published [an analysis](#) on the economic value banning bottom-contact fishing in UK offshore MPAs. The report shows that for Scotland:

- there is an overall socioeconomic benefit to society that begins once the bottom-towed fishing restrictions have been in place for 5 years;
- the net benefit of £888 million after 20 years, which shows that there is far more to be gained than lost in the mid- to long-term;
- the report concludes that “...it is within the interests of society and the UK economy to introduce a ban on bottom-contact fishing in the UK’s offshore benthic MPA network.”



Image: Lophelia pertusa (cold water coral) (credit: unknown author, creative commons)

Scottish Environment LINK consultation response
summary:
Fisheries Management Measures within Scottish
Offshore Marine Protected Areas (MPAs)



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Site	Site type	PMFs	Condition assessment	Objective
Anton Dohrn Seamount	SAC	Stony, bedrock and biogenic reefs	Unfavourable	Recover
Braemar Pockmarks	SAC	Submarine structures made by leaking gases	Unfavourable	Recover
Central Fladden	NCMPA	Burrowed mud	Unfavourable	Recover
Darwin Mounds	SAC	Stony, bedrock and biogenic reefs	Unfavourable	Recover
East of Gannet and Montrose Field	NCMPA	Offshore deep-sea muds	Unfavourable	Recover
		Ocean Quahog aggregations (including sands and gravels and their supporting habitat)	Unfavourable	Recover
East Rockall Bank	SAC	Stony, bedrock and biogenic reefs	Unfavourable	Recover
Faroe-Shetland Sponge Belt	NCMPA	Deep sea sponge aggregations	Unfavourable	Recover
		Offshore subtidal sands and gravels	Unfavourable	Recover
		Ocean Quahog aggregations	Unfavourable	Recover
Firth of Forth Banks Complex	NCMPA	Ocean Quahog aggregations	Unfavourable	Recover
		Offshore subtidal sands and gravels	Unfavourable	Recover
Geikie Slide and Hebridean Slope	NCMPA	Burrowed mud (seapens and burrowing megafauna)	Unfavourable	Recover
		Offshore subtidal sands and gravels	Unfavourable	Recover
		Offshore deep-sea muds	Unfavourable	Recover
Hatton Bank	SAC	Annex I Reef	Unfavourable	Recover
Hatton-Rockall Basin	NCMPA	Offshore deep-sea muds	Uncertain	Conserve or restore
		Deep-sea sponge aggregations		
North-East Faroe-Shetland Channel	NCMPA	Deep sea sponge aggregations	Favourable	Conserve
		Offshore sands and gravels	Favourable	Conserve
		Deep sea muds	Favourable	Recover
North West Orkney	NCMPA	Offshore subtidal sands and gravels Sandeel	Favourable	Conserve
North West Rockall Bank	SAC	Stony and biogenic reef	Unfavourable	Recover
Norwegian Boundary Sediment Plain	NCMPA	Ocean Quahog aggregations (including sands)	Unfavourable	Recover
Pobie Bank Reef	SAC	Bedrock and stony reef	Uncertain	Conserve or restore
Scanner Pockmark	SAC	Submarine structures made by leaking gases	Unfavourable	Maintain or restore
Solan Bank Reef	SAC	Bedrock and stony reef	Uncertain	Conserve or restore
Staton Banks	SAC	Bedrock and stony reef	Unfavourable	Recover
The Barra Fan and Hebrides Terrace Seamount	NCMPA	Burrowed Mud	Unfavourable	Recover
		Seamount communities	Unfavourable	Recover
		Offshore deep-sea muds	Unfavourable	Recover
		Offshore subtidal sands and gravels	Unfavourable	Recover
Turbot Bank	NCMPA	Sandeel	Favourable	Conserve
West of Scotland	NCMPA	Burrowed Mud (including sea pens)	Uncertain	Recover
		Coral gardens	Uncertain	Recover
		Cold-water coral reefs	Uncertain	Recover
		Deep-Sea Sponge aggregations	Uncertain	Recover
		Offshore deep sea muds	Uncertain	Recover
		Offshore subtidal sands and gravels	Uncertain	Recover
		Seamount communities	Uncertain	Recover
		Seamounts.	Uncertain	Recover
		Blue Ling	Favourable	Conserve
		Leafscale gulper shark	Unfavourable	Recover
		Orange Roughy	Unfavourable	Recover
		Portuguese dogfish	Unfavourable	Recover
		Roundnose grenadier.	Unfavourable	Recover
West Shetland Shelf	NCMPA	Offshore subtidal sands and gravels	Favourable	Conserve
Wyville-Thomson Ridge	SAC	Stony and bedrock reef	Unfavourable	Recover

A summary of the NCMPAs and SACs under consideration in the consultation Fisheries Management Measures within Scottish Offshore Marine Protected Areas (MPAs). The table shows the Priority Marine Features (PMFs) designated for protection within each site, what condition they are in and what the conservation objective is for each one.



Members, supporters and volunteers – what can you do?

Environmental management decisions can take many years to show positive effects, particularly in an environment such as the offshore and deep-sea area, where species and habitats are slow-growing and the conditions tend to be quite stable. The current generation of young people will live with the consequences of action (or lack of action) that is taken now.

- **Sign the LINK e-action:** <https://scotlink.eaction.online/deepseas> This calls for the **whole-site approach for fisheries management** to be adopted in all offshore MPAs and is delivered directly to the Scottish Government's consultation inbox, so will count directly towards the consultation outcomes. If you **add your personal message or comment** in the blank box provided, your response will receive greater weighting in the consultation outcomes. If you do not add your own comments, your response still counts but will be grouped with the others and receive a lesser weighting in the outcomes.
- **Submit a response to the consultation yourself:** You can use this document as guidance, or get in touch with us via the details below. Remember, you do not have to answer all the consultation questions to make your views known.
- **Share the e-action on social media or with your friends and family:** if more people respond, Scottish Ministers will see how important this topic is to our society.
- **Push back against misinformation:** over the last couple of years, debate about the once-proposed [Highly Protected Marine Areas \(HPMAs\)](#) in Scotland has continued. The measures proposed in this consultation are long standing proposals (initiated in 2015) and have been through extensive stakeholder participation. They are **not related to HPMAs proposals**, although some have recently falsely claimed that they are.

For more information, please contact LINK's Marine Policy and Engagement Officers:
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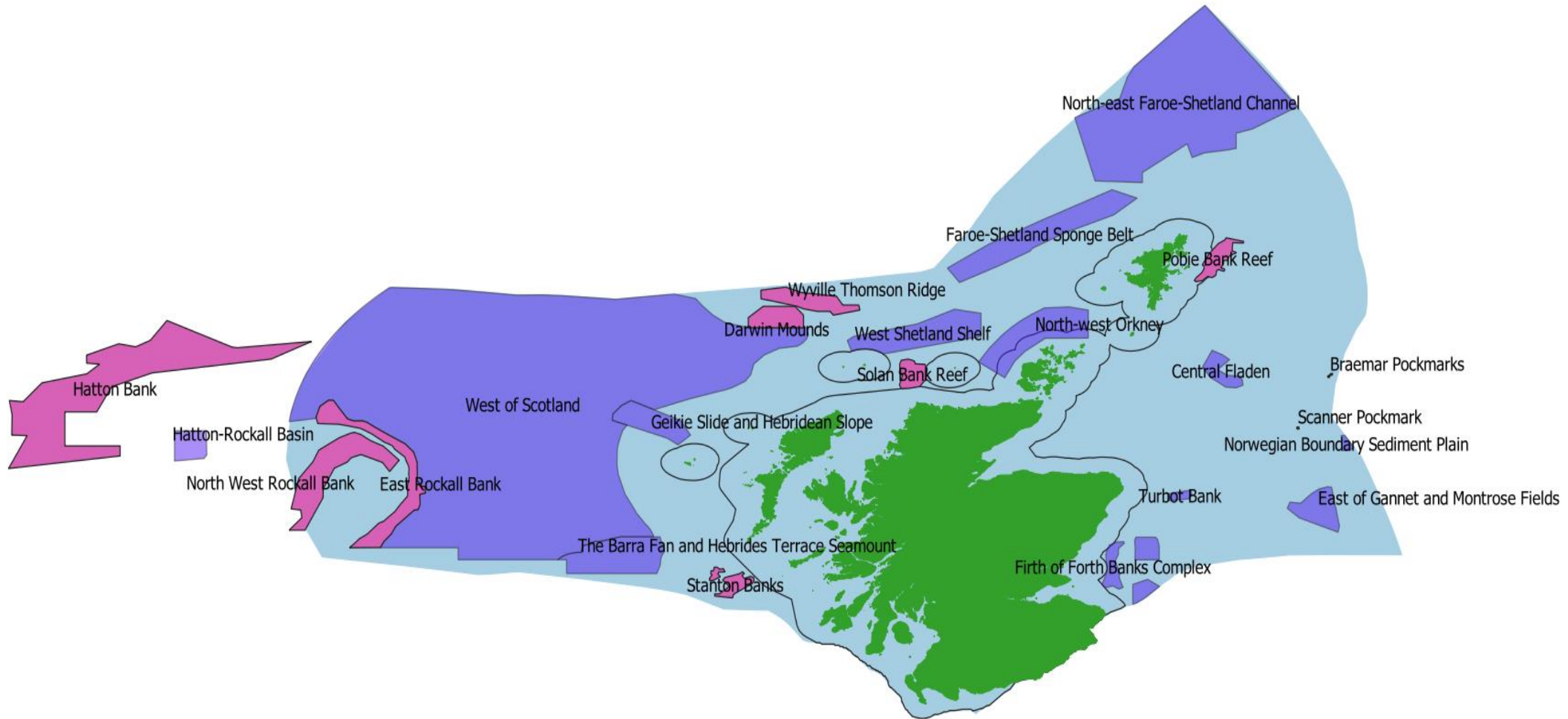


Image: Ocean quahog (credit: NatureScot on Flickr)

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A map of offshore MPAs and SACs in Scottish waters. The line around Scotland represents the 12 nautical mile boundary – beyond 12nm is considered the offshore area. The blue sites are NCMPAs. The pink sites are SACs.