



## **Scottish Seabird Conservation Action Plan**

March 2025

### **Introduction to Scottish Environment LINK**

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's marine group.

#### **1. Response**

##### **1. Do you support the implementation of the Scottish Seabird Conservation Action Plan?**

Yes

No

Unsure

##### **Please explain your answer:**

LINK members welcome and strongly support the implementation of the Scottish Seabird Conservation Action Plan. We have long been advocating for the adoption of a seabird conservation strategy, as stated in our Ocean Recovery Plan. We believe the Scottish Seabird Conservation Action Plan should provide a clear, accountable framework to ensure the recovery of nationally and internationally important seabird species.<sup>1</sup>

Scotland hosts over half of the UK's seabirds, and is home to many internationally significant breeding seabird colonies. As apex-predators, seabirds are a clear indicator of ocean health<sup>2</sup>. Yet these emblematic species face continuing and cumulative threats, including climate change, invasive predators, and food scarcity. The recent Highly Pathogenic Avian Influenza (HPAI) has also played a role in the decline by causing mass bird deaths<sup>3</sup>.

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<sup>1</sup> <https://www.rspb.org.uk/media-centre/scotlands-seabirds-face-bleak-future-without-urgent-action>

<sup>2</sup> <https://www.sciencedirect.com/science/article/abs/pii/S0308597X16000671>

<sup>3</sup> <https://www.seabird.org/threats/disease>



UK administrations collectively failed to achieve Good Environmental Status (GES) for 11 out of 15 indicators under the UK Marine Strategy, with seabird populations in particular continuing to decline. The recent Seabirds Count census paints a sobering picture, revealing that nearly two-thirds of Scotland's breeding seabird species have suffered population declines over the past two decades<sup>4</sup>. In 2024, five more seabird species were added to the UK Red list<sup>5</sup>.

The Scottish Seabird Conservation Action Plan is urgently needed to ensure the recovery of seabird populations and their resilience in the face of climate change. If implemented with urgency, effective funding and the additional asks above, this action plan can meet the key needs to bring our seabirds back from the brink of disaster.<sup>6</sup>

## 2. Do you agree that the key pressures to seabirds in Scotland are identified?

Yes

No

Unsure

### If no, please provide detail:

LINK members agree that most of the key pressures to seabirds in Scotland are identified in the Scottish Seabird Conservation Action Plan. We believe that renewable energies should be more directly identified as a key pressure for seabirds. The expansion of offshore wind is crucial in our fight against climate change, but it must be implemented in a way that considers its cumulative impact and supports nature restoration.

It is also crucial to remember that seabird populations face an unprecedented **accumulation of pressures**. Achieving Good Environmental Status (GES), and enabling the much-needed recovery of marine ecosystems therefore requires a holistic approach to marine management and wider sea measures. It has long been recognised that we need a three-pillared approach to nature conservation at sea which includes crucial wider seas measures such as marine planning. The updated National Marine Plan and relevant future regional marine plans must help foster holistic and ecosystem-based marine management by effectively addressing cumulative impacts and reducing pressure from anthropogenic activities overall. Such an integrated approach will help reduce the impact not only on seabirds but all marine species and habitats.

## 3. Have we captured the key actions needed to deliver the vision, aims and objectives?

Yes

No

Unsure

### If no, please provide detail:

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<sup>4</sup> <https://community.rspb.org.uk/ourwork/b/science/posts/publication-of-seabirds-count-2015-2021-census-results>

<sup>5</sup> <https://britishbirds.co.uk/seabird-bocc5a>

<sup>6</sup> RSPB e-action [https://action.rspb.org.uk/page/154240/action/1?ea.tracking.id=rspb\\_website](https://action.rspb.org.uk/page/154240/action/1?ea.tracking.id=rspb_website)





LINK members called for the Scottish Seabird Conservation Strategy to provide a clear, accountable framework to ensure the recovery of nationally and internationally important seabirds. We agree that the action plan captures some of the key actions needed to support the recovery of seabird species. We however, suggest further actions should be considered. Seabird populations face an unprecedented accumulation of pressures. Ensuring the recovery of seabirds therefore requires a holistic approach to marine management and wider sea measures.

The language used in some of the actions creates uncertainty that the actions will be fully delivered. The actions that only commit to exploring or considering further steps should be reworded to be stronger and more definite in what they will deliver. Simply exploring opportunities does not guarantee the delivery of them.

LINK members call for a precautionary approach to safeguard Scotland's marine ecosystems and ensure the recovery of seabird populations. We believe there needs to be a clear commitment to roll out the use of Remote Electronic Monitoring (REM) with cameras on all fishing vessels, with longliners as a priority, alongside effective bycatch mitigation to end seabird bycatch. REM is a robust, tried and tested, cost-effective means of delivering fully documented fisheries. The benefits of using REM are widespread and systems can be adapted to reflect policy or management objectives.

Language such as '*exploring*' the use of REM is ambiguous and overlooks the fact that this is a well-established technology, that is already successfully used in fisheries worldwide to monitor mitigation effectiveness and reduce seabird and other marine wildlife bycatch. There is a need for stronger language in the action plan regarding REM to ensure that it is implemented effectively as a standard monitoring tool. REM also enables fisheries to showcase their sustainable practices to the public and buyers, and processors in the seafood industry, and will generate robust data that will provide greater confidence in stock sustainability as well as evidence of the impact on wider marine species and habitats.

We also believe the action around bycatch should be expanded to include a commitment to increase research to better understand the issue, including further research into where birds caught are coming from.

In support of safe places for seabirds, in addition to capturing all the important sites for seabirds, it is imperative to complete the Scottish MPA network, implementing tailored fisheries management measures in all sites. An ecologically coherent and well-managed network of MPAs is essential to safeguard and support the recovery of marine ecosystems. LINK members believe a precautionary approach should be adopted. In addition to this, the protected site network must also be well-managed, and effectively monitored and enforced, with an up to date SPA sufficiency review that goes beyond the Scottish Marine SPA Network Assessment (2018), and incorporates findings from the recent HPAI outbreaks and the Seabirds Count Census (2023). We advocate for ensuring that all protected seabird sites are included in this, as on some seabird island SPAs, unregulated damaging activities are taking place.

This will allow us to understand where the gaps in the protected areas network are for seabirds, and to what extent the network provides for seabirds. We support the whole site approach for mobile demersal fishing restrictions in SPAs. This includes exclusion on hydraulic (suction) dredging for sandeel habitat protection. We also believe that non-invasive methods to monitor forage fish species within the site should be established. Due to by-catch risk, the use of gillnets should be prohibited within protected sites.



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The plan should also implement actions and measures to support carbon sequestration in protected areas. Safeguarding blue carbon habitats plays a crucial role in strengthening seabird populations by preserving and enhancing the marine ecosystems they rely on, supporting fish populations as a key food source, and contributes to climate resilience and stabilising the marine environment for future seabird populations.

The expansion of offshore wind is key in our fight against climate change, but it is essential that it is done in ways that also address its cumulative impact and help restore nature. LINK members call for a clear commitment that offshore wind will be progressed in a manner that delivers nature positive outcomes<sup>7</sup>. We recognise the value in ‘using the best evidence to assess potential impacts on seabird populations from marine renewables’ as an action but would like to see actions associated with this that facilitate investment for the mitigation of offshore wind impacts. This includes developing robust policies requiring strategic compensation and biodiversity enhancement.

Finally, we believe the plan should increase its scope and include two important Scottish seabird species – the Common Gull and Black-headed Gull. Both species have suffered major declines in Scotland<sup>8</sup>. The latest Seabirds Count census shows that common gull numbers have decreased by 53% since the last census in 2000, and the Black-headed gull population shrunk by 75%. Including them in the Scottish Seabird Conservation Action Plan would be a vital step to ensure adequate protection and recovery of these species at a healthy level.

Clear funding streams need to be identified. Scotland is currently on a path to strategic compensation for offshore wind. If fully realised, strategic compensation through the marine recovery fund could provide funding for some of these actions. However this stream will take time to come through and will come through in waves as plans for sites are developed. The actions need to be delivered urgently and to ensure the Plan is fully achieved a better understanding of funding and timescales is needed. Additionally, we emphasise the need for clear details on who will be responsible for delivering the actions in the plan, how the outcomes will be delivered effectively, and clear timeframes for each action. This will ensure transparency in who is held accountable and responsible for delivering actions.

#### **4. Do you have any views on what measures we should use to monitor progress and success?**

LINK members believe that the annual review of the Action Plan by the Seabird Conservation Delivery Partnership should be published to maintain focus on progress of the many urgent actions outlined and on what funding is being made available to deliver these. The actions should include commitments to when they are to be delivered as this would help guide both implementation and monitor progress.

As mentioned in previous questions, Remote Electronic Monitoring (REM) with cameras is vital to achieving Good Environmental Status (GES) and LINK members have long called for the roll-out of this effective monitoring tool. We believe there needs to be a clear commitment to roll out the use of Remote Electronic Monitoring (REM) with cameras on all fishing vessels, with longliners as a priority, alongside effective bycatch mitigation to end seabird bycatch.

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<sup>7</sup> <https://www.scotlink.org/wp-content/uploads/2024/01/powering-healthy-seas-report-rspb-august-2022.pdf>

<sup>8</sup> <https://www.nature.scot/new-guidance-protect-gull-populations-serious-decline>





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