



Cramond House
Kirk Cramond
Cramond Glebe Road
Edinburgh
EH4 6NS

lamlashbayconsultation@scotland.gsi.gov.uk

Daniel Brown
Sea Fisheries Management, Fishing Communities and Inshore Management team
Marine Directorate
DG Environment
Room 511
Pentland House
47 Robb's Loan
Edinburgh EH14 1TY

29 April 2008

Dear Sir

CONSULTATION ON PROPOSED MARINE RESERVE IN LAMLASH BAY:

The Scottish Wildlife Trust (SWT) has over 30,000 members and is a member of Scottish Environment LINK. SWT and LINK have actively supported COAST for several years, and have campaigned for several years for further marine protected areas in Scotland. SWT's 27 coastal reserves include some of Scotland's most important coasts and islands, Eigg, Handa, Lingaholm, Spey Bay and Montrose Basin.

Question 1: Do you *agree* or *disagree* with the proposal to establish a Marine Reserve in Lamlash Bay?

Scottish Wildlife Trust strongly agrees with the proposal.

Question 2: Do you think there would be any a) *positive* and b) *negative* implications should a Marine Reserve be established in Lamlash Bay?

SWT believes there would be a number of positive implications for marine life, for the community of Arran, for science, for commercial interests and for the wider Scottish public:

- **For Marine Life** - The Marine Reserve designation will, for the first time in Scotland, leave an area of sea to regenerate undisturbed, allowing what is known to have been a rich area for marine life to recover some of its previous diversity and abundance. Recent research has shown Scotland's seas

to be amongst the most degraded in the world¹, and there is good historical evidence to indicate that many fish species and other biodiversity have been lost in the Firth of Clyde area as a result of human disturbance, particularly commercial fishing. Less than 0.001% of UK waters is currently fully protected from human activities. Although the proposed Lamlash Marine Reserve is a tiny area of sea, its protection is a very significant and necessary move towards marine ecosystem recovery against this backdrop of widespread environmental deterioration.

- **For the community of Arran** - The Community of Arran Seabed Trust has worked extremely hard to achieve a great deal of local and national support for the proposed Marine Reserve, and has overcome many difficulties to bring their proposal to this consultation stage. The creation of a Marine Reserve sends a very positive message not only to the people of Arran, but to other marine-based communities in Scotland, that the Scottish Government is responsive to local community needs and priorities. It has long been recognised that environmental management is most effective where there is a sense of local 'ownership' for natural resources. This is very much the case on Arran, and Lamlash should provide an excellent demonstration of local natural resource management in action. We believe that the experiences of COAST and the length of time taken to reach this stage should prompt action to improve community access to local marine management tools through provisions in the forthcoming Scottish Marine Bill.
- **For science** - There are very few areas of UK sea that are fully protected from human activities, and therefore limited scope for research on ecosystem recovery. Lamlash will provide a useful site for such research.
- **For commercial interests** - Commercial fisheries in the Clyde area, as in the rest of Scotland, have suffered as a result of overfishing and fishing techniques that damage fish habitat. There is established evidence from elsewhere in the world that marine reserves can promote habitat and species recovery, including some commercial fish species^{2,3}. Closed areas to dredging and bottom trawling have proved extremely beneficial to scallop density inside the closed area as well as outside in the fished area both in the Isle of Man and at Georges Bank. Lamlash Marine Reserve will protect maerl and is believed likely to enhance queen scallop populations and act as a nursery area for young fish, with possible overspill of commercial species into surrounding areas⁴. We believe that, in addition to the Marine Reserve, the proposed marine protected area to the west of Holy Isle should become a permanent NO mobile gear fishery. This would be likely to benefit sustainable fisheries. We would suggest that is very much time that the Scottish scallop industry, both dredged and dived, began to use both permanent and seasonal closures more generally in order to improve the viability and sustainability of the fishery. There are a number of other commercial interests of increasing value to local communities that would be likely to benefit from a more diverse and abundant marine environment in this area, notably marine tourism and sea angling.

¹ Halpern, B.S. et al (2008), A Global map of human impacts on marine ecosystems, *Science*, 15 February 2008, Vol. 319. no. 5865, pp. 948 – 952

² Halpern, B.S. (2003). The impact of marine reserves: do reserves work and does reserve size matter? *Ecological Applications* **13**: S117-S137.

³ For example, Hall-Spencer, J. M. and Moore, P. G. (2000). Scallop dredging has profound, long-term impacts on maerl habitats. *ICES Journal of Marine Science* **57**, 1407-1415: Hill, A. S., Brand, A.R. Veale, L.O. & Hawkins, S.J., 1997. Assessment of the effects of scallop dredging on benthic communities. Report to MAFF, University of Liverpool: 112 pp. (Available at http://www2.defra.gov.uk/research/Project_Data/More.asp?I=MF0713&M=CFO&V=ULP)

⁴ See for example Kamenos, N.A., Moore, P.G. and Hall-Spencer, J.M. (2004). Nursery-area function of maerl grounds for juvenile queen scallops *Aequipecten opercularis* and other invertebrates. *Marine Ecology – Progress Series* 274, 183-189. Headquarters, Cramond House, Kirk Cramond, Cramond Glebe Road, Edinburgh, EH4 6NS
tel: 0131 312 7765 fax: 0131 312 8705 email: enquiries@swt.org.uk web: www.swt.org.uk

- **For the wider public interest** - It is in the wider public interest of Scotland to have a marine environment that is healthy, biodiverse and productive, serving the needs of the many whose livelihoods or amenity depend on healthy seas. This is not yet the case, particularly when one examines historical accounts, but the Marine Reserve at Lamlash is a positive step towards achieving this.

We do not believe there would be any significant negative implications from this proposal.

Question 3: Are there any *other points* which you would like to make in relation to the proposed Lamlash Bay Marine Reserve?

- Lamlash Bay is an extremely small area of Scotland's territorial waters. SWT believes that the Marine Reserve at Lamlash should be the first of many such areas designed to promote the recovery of diverse and productive marine ecosystems. We believe that the forthcoming Scottish Marine Bill should deliver a new network of Nationally Important Marine Areas and a community tool for the creation of local Marine Nature Reserves.
- We believe that the proposed marine protected area to the west of Holy Isle should become a permanent NO mobile gear fishery, with benefits for the sustainability of local fisheries.

Yours sincerely

Rebecca Boyd
Marine Policy Officer
Scottish Wildlife Trust

From: email: bboyd@swt.org.uk

Name: Rebecca Boyd

Address: Scottish Wildlife Trust, Cramond House, Cramond Glebe Road, Edinburgh

Post Code; EH4 4NS

ANNEX D

RESPONDER INFORMATION FORM

Consultation on a proposed Marine Reserve in Lamlash Bay

Postal Address: SWT, Cramond House, Cramond Glebe Road, Edinburgh, EH4 4NS

- **I am responding on behalf of a group/organisation.**
- **I am happy for the name and address of my organisation and my response to be made publicly available, and to be contacted by the Scottish Government in relation to this consultation.**

Please complete the details below and return it with your appropriate response. This will ensure we handle your response appropriately. Thank you for your help.

Name:

Postal Address:

1. Are you responding: (please tick one box)
- | | |
|--|-------------------------|
| (a) as an individual | go to Q2a/b and then Q4 |
| (b) on behalf of a group/organisation | go to Q3 and then Q4 |

INDIVIDUALS:

- 2a. Do you agree to your response being made available to the public (in Scottish Executive library and/or on the Scottish Executive website)?

Yes (go to 2b below)
No, not at all We will treat your response as confidential

- 2b. **Where confidentiality is not requested**, we will make your response available to the public on the following basis (please tick **one** of the following boxes)

Yes, make my response, name and address all available
Yes, make my response available, but not my name or address
Yes, make my response and name available, but not my address

ON BEHALF OF GROUPS OR ORGANISATIONS:

3. The name and the address of your organisation **will be** made available to the public (in the Scottish Executive library and/or on the Scottish Executive website). Are you content for your response to be made available?

Yes
No We will treat your response as confidential

SHARING RESPONSES/FUTURE ENGAGEMENT

- 4 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Government to contact you again in the future in relation to this consultation response?

Yes
No

