Written submission from Sea Change Wester Ross

Re: Support for South Arran MPA and the prompt ratification of all MPAs.

I am writing to appeal to you again.

The MPA network is a turning point and even the greatest historic opportunity for Scotland’s Seas for generations. Yet Sea Change Wester Ross is concerned that the RACCE committee process may be in danger of being used by a minority commercial interest to attempt to annul South Arran MPA and derail the wider MPA process, purely to further a small group’s ‘big business’ ends.

This is clearly not in the wider public interest or for future generations. It is also clear the mobile sector, in this case Clyde Fishermen’s Association backed by the Scottish Fishermens Federation are trying to push the MPA process into the long grass by utilising the Committee process to delay and deny the democratic process that has already had a full consultation period. (See the process outlined below of the democratic process already undertaken in full at vast public expense.)

We recognise the mobile sector has a right to be heard, valued, and respected - yet they should not be the tail that wags the dog and they have had years of consultation already.

The majority of coastal people and the public are best served by the current MCOs for the MPA network being ratified as soon as possible without delay.

The seas are under threat from climate change, acidification, species extinction, micro plastics, chemicals and over-fishing by mobile gear causing biodiversity loss and ecosystem damage that further impact our health and economic stability. The MPAs offer hope.

- The MPA network offers great socio-economic benefits to a wider group of stakeholders, communities and fisheries, which in turn serves the wider public.

- There is widespread public support for MPAs as well as better managed fisheries for all. (The Mobile sector do not act for the wider public interest and should not be allowed to control the process or outcome.

- Wester Ross MPA has had three MPA consultations within the last 12 months. (A full account of the long process is below) The last two management consultations have been driven by demands from the Mobile Sector - a well resourced body with disproportionate political and financial influence. Furthermore the RACCE committee took further evidence in the Autumn and explored their issues then. In an analysis of their economic arguments their evidence was considered to be so misleading it was not fit to be used for making political decisions. Why are they allowed to continue delaying the process?

- Now just after the completion of a final consultation (done on their request) the Clyde Fishermen’s Association and SFF want to use the RACCE committee to further their minority commercial self interest again.
- History shows clearly what happens to fisheries and ecosystems when a minority commercial interest is allowed to determine policy.

The greater public interest needs to be served as well as the requirements of the Marine Strategy Framework Directive. I would also like you to note that community groups are volunteers seeking to represent the wider public interest which has for far too long been ignored. Long uncertain processes do great harm. We urgently need stability and certainty after a consultation that has dragged on for 5 years – putting the community groups and fishermen under great strain. The mobile gear sector does not own the seas and they should not be allowed to disenfranchise the public or the vast majority of other fisheries who stand to gain from MPAs.

Future generations will look back at this time as either a turning point or as a catastrophic failure of Government and a missed opportunity. Scotland could be proud of the Marine Protected Areas in decades to come as greater prosperity to a much wider group of stakeholders is felt.

**The future of our coastal communities depend on you ensuring this process is not delayed by further ‘tactics’**.

Yours sincerely,

Sara Nason

Member of Sea Change Wester Ross

**TIMELINE OF CONSULTATIONS**

The consultation process for designations and management orders has taken 5 years. Designations were based on scientific evidence supplied by SNH and JNCC.

Marine Consultations held so far:

5 National workshops (2011 and 2012)

9 management options events (April – July 2013)

56 Planning Scotland’s Seas events (August – October 2013)

11 Displacement events (February - March 2014)

3 Phase 1 regional management forum events (October 2014)

14 Management consultation events (November 2014 to January 2015)

3 Phase 2 regional management forum events (May 2015)

This does not include full consultations of 12 week + held before designations and in advance of management decisions.
Three of the inshore MPA’s including Wester Ross have had 3 management consultations in a year - driven by the mobile gear lobby’s demands for more consultation. Feb 2015, August 2015, Jan 2016.

The SFF has an annual turnover of £6 million + and have had 5 years to present strong economic or scientific evidence. Their economic report was called “a very poor piece of work” and “if taken seriously, would significantly mislead decision makers.”

Coastal groups are made up largely of volunteers who voice a diverse group which wants change and reflects local opinion in the area that wants well managed MPAs.