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## **COAST's response to Scottish Government consultation 2023 about Highly Protected Marine Areas (HPMAs)**

### **Questions about the HPMA Draft Policy Framework**

**Question 1. What is your view of the aims and purpose of Highly Protected Marine Areas as set out in sections 2 and 3 of the draft Policy Framework?**

- Support

**Please explain your answer**

From our experience with the Lamlash Bay No Take Zone (NTZ) at Arran, together with the fisheries management measures introduced to the South Arran Marine Protected Area (MPA), the Community of Arran Seabed Trust (COAST) recognises the importance and benefits that marine protection can deliver for the environment, people and the economy.

We welcome the recognition that action is urgently needed to address biodiversity loss and the degraded state of Scotland's seas. COAST recognises the role of HPMAs to help enable marine ecosystems to recover and regenerate, and we support, in principle, the designation of HPMAs in Scottish seas. However, we are very concerned that if the designation of HPMAs is undertaken in isolation it is likely to be particularly divisive and have unintended consequences for both the marine environment and coastal communities.

In order to be effective we consider that HPMAs need to be developed as part of an integrated approach to managing Scotland's seas so that the selection and siting of HPMAs can be developed in conjunction with other marine management measures (such as for fisheries). This would provide a joined-up approach to support ecosystem recovery and enhancement, protect blue carbon and essential fish habitats and deliver an ecosystem-based approach for marine management. Failure to do so will severely limit the contribution that HPMAs can make to achieve the desired aims and will result in continuation of the piecemeal and disjointed management of Scotland's seas.

Presenting HPMAs as a nature conservation measure, as is stated in the consultation document, is unhelpful as it perpetuates that somehow nature, and nature recovery, exist in isolation from human activities and the economy. It also perpetuates the incorrect view that these protected areas (MPAs and HPMAs) are, on their own, going to be able to deliver ecosystem recovery for Scotland's seas. HPMAs are one form of spatial management that can be applied to help recover and sustain marine biodiversity and marine ecosystems. However, they cannot deliver the desired aims on their own or if only considered within the context of other MPAs. Scotland's inshore waters require a comprehensive ecosystem-based

spatial management approach that can deliver urgently needed marine biodiversity and marine ecosystem recovery and support truly sustainable activities.

From our experiences with the marine protected areas at Arran, backed up by results of research in the Lamlash NTZ and South Arran MPA, we consider that it is essential that HPMA in Scotland's inshore waters are developed alongside other spatial measures, such as low impact buffer zones around HPMA, favouring lower impact activities including less-impacting fisheries such as creels and hand diving.

The tiered spatial zoning provided by Arran's NTZ and MPA provides an example of how such an approach can be developed and operate in practice. The marine protected areas on Arran were developed with strong community involvement and there is considerable support for the protection that they provide. In Scotland's inshore area there are opportunities to develop proposals for HPMA in a much more holistic way and with greater community involvement and collaboration. A more locally involved process provides opportunities to explore the options for HPMA alongside other marine management measures within more localised geographic areas.

In relation to the objectives of HPMA we consider that the overarching objective should be 'facilitate ecosystem recovery and enhancement' with other aims and ecosystem functions nested beneath this. We consider that 'biodiversity recovery and enhancement' should be explicitly identified as an aim; this is currently missing from the aims, but it is integral to achieving ecosystem recovery and enhancement and, as such, should be explicitly stated.

The degraded state of, and loss of biodiversity from, Scotland's seas needs to be understood more widely within Scotland. While the consultation documents refer to this and the climate change crisis, more information should be provided to explain the loss and degradation in more detail and set this within the context of national and international targets and obligations we are failing to meet. As the HPMA programme develops it would be helpful for this information to be provided at more localised, regional scale.

There need to be clear and relevant criteria and targets for ecosystem recovery and enhancement, informed by our knowledge of past biodiversity loss and marine ecosystem degradation. Without this, the concept of ecosystem recovery is undefined and nebulous. These criteria and targets need to be applied more broadly to other areas of marine management, such as for fisheries, as well as HPMA, to provide a more coherent approach and support ecosystem-based management.

The consultation document identifies relevant IUCN protected area categories and how these relate to Scottish HPMA, which is helpful. However, while we would expect some HPMA to safeguard less impacted or 'pristine' areas, we consider that there needs to be scope to include some examples of more impacted/degraded areas as well to facilitate recovery of habitats and species.

HPMA can provide important opportunities to support non-damaging activities that deliver societal and economic benefits. We support the proposal that HPMA provide core, highly protected, no take areas, but would want them to allow for access and recreational activities compatible with their conservation objectives so the benefits of HPMA to support public awareness, education and research can be realised.

**Question 2. What is your view of the effectiveness of the approaches to manage the activities listed below, as set out in section 6 of the draft Policy Framework, in order to achieve the aims and purpose of HPMA's?**

*Refer to section 6 of the draft policy framework to see the approaches proposed for each type of activity*

Commercial fishing of any kind: Strongly support

Recreational fishing of any kind: Strongly support

All other recreational activities: Support

Finfish aquaculture: Strongly support

Shellfish aquaculture: Strongly support

Seaweed harvesting: Strongly support

Oil and gas sector: Strongly support

Renewable energy sector: Support

Carbon capture, utilisation and storage: Strongly support

Subsea cables: Support

Aggregate extraction: Strongly support

Ports and harbours: Support

Shipping and ferries: Support

Military and defence: Neutral

Hydrogen production: Support

Space ports: Strongly support

**Please explain your answer in the text box and if you think we have missed any activities, please suggest them here**

**Overall approach**

Please see our response to Qu 1 where we explain our concerns that pursuing HPMA's in isolation from other marine management measures is likely to be divisive and to have unintended consequences, and also severely limit the contribution of HPMA's to achieve the ecosystem recovery and enhancement aims.

A joined-up approach to marine policy and management is required with HPMA's as one of the spatial measures used to achieve the Government's vision for Scottish seas. This requires all marine sectors to be managed to contribute to achieving the targets for ecosystem recovery and enhancement. There are considerable opportunities to improve the condition of the marine environment through effective use of a range of spatial measures.

HPMA's have the potential to result in displacement of restricted activities which is likely to result in increased pressures elsewhere in the marine environment. This would have negative consequences for ecosystem health and is why there needs to be a coherent plan for ecosystem recovery and enhancement of which HPMA's are a part.

As we note in our response to Qu 1, the tiered spatial zones that exist within Arran's marine protected areas (the Lamlash Bay NTZ and the South Arran MPA) provide an existing and useful example of how spatial management can be applied to provide a strictly protected core area within a much larger low impact

zone. It just so happens that at Arran these arrangements are provided through designated marine protected areas, but other options, such as spatial fisheries management areas could be used to establish low impact buffer areas. Such measures need to be identified in discussion with local communities and marine users to explore options and define what such buffer areas in conjunction with HPMA's aim to deliver, and how such measures can contribute to coastal social and economic resilience and stability. This approach could support Scottish Government's obligations to deliver Good Environmental Status and also deliver requirements under the Fisheries Act to support low impact fisheries.

Management needs to identify and address all pressures on HPMA's, including off-site activities where impact pathways have implications for an HPMA, e.g. runoff and pollution from onshore and offshore activities and noise pollution. The development of buffer zone areas in conjunction with HPMA's would allow for indirect impacts on HPMA's to be addressed to some degree (e.g. discharges from outside of an HPMA but which are carried by tidal flow into an HPMA).

### **Proposed measures for activities**

We support the proposal that HPMA's provide core, highly protected, no take areas. As well as contributing to ecosystem recovery, areas where human impact is minimised as far as possible will help us start to understand how marine habitats, communities, and ecosystems respond in the absence (as far as possible) of human influence so that this learning can be applied to how we can better manage protection and use of the marine environment in the future.

As we commented in response to Qu 1, we think it is important that access and recreational activities compatible with the conservation objectives of a HPMA are allowed so that the benefits of HPMA's to support public awareness, education and research can be realised.

### **Removal of marine species**

The HPMA measures need to cover all forms of removal of marine fauna, flora or other natural material (sand/gravel etc) from HPMA's. This is covered under 'recreational activities' but not addressed in terms of commercial activity. Many marine species would not be legally recognised as fish or shellfish and therefore would not be protected by fisheries measures alone.

### **Boats / vessels**

It would have been helpful in the consultation document to have incorporated information in section 8 into the text covering specific activities in section 6. Although mentioned in section 8, anchoring is not specifically referenced in section 6 in relation to any vessel.

Prohibition of discharges from vessels is only included in relation to shipping and ferries (section 6.11). We consider that this should apply more widely to other vessels as well.

The implications of different sorts of craft need to be assessed on a case-by-case basis.

### **Question 3. What is your view of the proposed additional powers set out in section 8.3.2 of the draft Policy Framework: "Allow for activities to be prohibited from the point of designation to afford high levels of protection."**

- Strongly support

### **Please explain your answer**

We consider that highly protected marine areas have an important contribution to make to ecosystem recovery and enhancement as one form of spatial measure nested within a framework of broader spatial management for the whole of Scotland's inshore waters.

We suggested that ‘the collection of any non-biological material, e.g. rock, sand gravel etc.’ should be added to the second bullet point in section 8.3.2.

Penalties for offences need to act as a deterrent to further infringements. There need to be provisions that allow a requirement for restoration or additional compensation payment towards restoration or addressing the impacts of damage from illegal activities. We comment in more detail on enforcement matters in our response to Qu 7.

The information in section 8.3.2 fails to address how new activities that do not fall within an existing consenting regime will be picked up and addressed promptly. There need to be provisions that address this.

**Question 4. What is your view of the proposed additional powers set out in section 8.3.3 of the draft Policy Framework: “Establish processes to permit certain limited activities within a HPMA on a case-by-case basis for specified reasons.”**

- Support

**Please explain your answer**

Allowing otherwise prohibited activities within an HPMA should be a last resort after all other reasonable alternatives have been considered. There needs to be a particularly rigorous assessment process, open to public scrutiny associated with the permitting of any otherwise prohibited activities. The provisions should require identification of any remediation / compensation actions (including monetary, habitat restoration or others) for impacts from the permitted activity as an integral part of the assessment process to allow an otherwise prohibited activity. In this way there would be up front recognition of the implications of these activities being licenced and assessment of the likely and actual impacts and measures required to address them.

**Question 5. What is your view of the proposed additional powers set out in section 8.3.4 of the draft Policy Framework: “Activities which are not permitted in a HPMA but are justified in specified cases of emergency or force majeure.”**

- Support

**Please explain your answer**

It needs to be clear who would be the responsible authority in such situations.

There need to be provisions that require assessment of the impacts of such interventions and measures as soon possible and that enable the application or remedial / compensatory measures (including monetary compensation) if damage has occurred.

**Question 6. What is your view of the proposed additional powers set out in section 8.3.5 of the draft Policy Framework: “Measures for activities allowed and carefully managed in HPMA’s.”**

- Support

**Please explain your answer**

There needs to be consideration of the implications of activities when possible HPMA sites are identified and an understanding of the potential impacts from these and the environmental carrying capacity of an area.

HPMA management will need to include a degree of activity monitoring alongside ecological monitoring and periodic assessment to determine if any changes to site management are required.

We support the proposal for provisions for introducing a permit system for activities. This is an approach used in other countries and can help generate revenue if permits are charged for and the money fed back into management of the area.

It is important to have flexibility within any permitting system to enable a prompt response to changes in levels of use or impacts. Scope exists for delegation of some management responsibilities in some HPMAs to relatively local bodies and we would like to see these opportunities being explored further; this could include management of permits providing more localised management.

**Question 7. Do you have any further comments on the draft Policy Framework, which have not been covered by your answers to the previous question.**

## **Section 7 Monitoring and Compliance**

### **Ecological monitoring**

There needs to be an effective and coherent programme of monitoring across the HPMA/MPA network and within any associated buffer areas or other inshore spatial measures. It will be essential to establish a baseline condition for sites and other spatial areas and maintain long-term monitoring to maximise learning for future management decisions.

It is essential that conservation objectives relate to quantified improvements in ecosystem health amongst other things (reflecting a contribution to over-arching criteria and targets for ecosystem recovery and enhancement). Given the overall aims for HPMAs, their objectives should not just be conservation objectives but should contribute to broader social and economic and ecosystem objectives as well. As commented earlier, there need to be clear and relevant criteria and targets to quantify ecosystem health against which the effectiveness of HPMAs and other management measures such as MPAs and fisheries management can be assessed.

### **Compliance monitoring and enforcement**

The example of the Lamlash No Take Zone demonstrates that a high degree of local buy-in for a highly protected area can assist compliance monitoring. The framework for compliance reporting and enforcement needs to embrace this opportunity and consider how local communities can contribute most effectively to compliance monitoring, with a publicly available compliance and enforcement strategy for HPMAs/MPAs and associated buffer areas/spatial zones.

We are concerned with the suggestion that enforcement powers and penalty system for HPMAs will mirror those which currently exist for MPAs, as those currently in place are ineffective and they do not act as a deterrent to illegal activities. There needs to be a more effective enforcement and penalty system for illegal activity within HPMAs (and MPAs). Penalty levels need to reflect the implications of any ecological damage that occurs (which isn't currently the case), and there need to be provisions that require compensation in the event of environmental damage to assist restoration / recovery actions.

### **Section 8.3.1**

In relation to the purposes for which a HPMA is designate we think it is necessary for this to be expanded to make it explicit that an HPMA is contributing to something wider than just an individual site. We suggest wording along the lines "...contributing to overall recovery and enhancement of Scotland's marine ecosystems" is added after "...recover and thrive;"

We are concerned about the proposal (para 4, 8.3.1) that HPMAs will form part of the network of conservation sites as defined under section 79 of the Marine Scotland Act 2010. The wording of S79, covering the conditions for the network of MPAs, is narrowly defined, and there is no specific reference to contributing to ecosystem recovery and enhancement. We consider that there need to be amendments to

widen the objectives of the network to specifically encompass the aims of HPMA as set out in the draft policy framework, with ecosystem recovery and enhancement as an overarching aim.

Para 5, 8.3.1 refers to providing powers to Scottish Ministers to revoke existing HPMA designation orders. There needs to be a clear set of criteria guiding when this step could be taken and the process that needs to be followed to avoid weakening the contribution of HPMA to ecosystem recovery and enhancement.

### **Engaging local communities**

COAST wants to see a recovered, healthy and productive marine environment that enables sustainable marine-based activities and supports community-based enterprise and well-being. While in principle we support the proposal for HPMA, as a community-based organisation, we are concerned that HPMA proposals could be highly divisive within local communities with long-term repercussions. We consider that:

- It is essential that the HPMA process involves local sea users and the wider community from the start and enables open discussion to explore available evidence, options and opportunities with those who will be most directly affected by the proposals.
- HPMA can help support sustainable fisheries; site selection needs to directly involve local fishermen and consider how proposals can best provide fishery benefits and support an associated just transition to low impact fisheries (which is a requirement on the Scottish Government under the Fisheries Act).
- Whilst complete agreement for individual HPMA proposals is highly unlikely, developing sites with greater community and other stakeholder support will deliver a more sustainable network of sites
- Opportunities for co-management of HPMA (and any associated buffer areas) with local communities and organisations should be considered wherever possible.

### **Realising benefits from HPMA**

To deliver the greatest benefits from HPMA, the selection of HPMA needs to:

- make best use of existing science to optimise site selection and maximise ecosystem recovery and socio-economic benefits in conjunction with other spatial measures (including MPAs, other marine spatial management (such as a limit on bottom-contact fishing), and coastal terrestrial initiatives).
- deliver protection and recovery of essential fish and shellfish habitats and blue carbon habitats.
- contribute to delivering sustainable fisheries and other maritime activities.
- consider how designation can support existing environmental and socio-economic policies and initiatives, including for adjacent terrestrial areas. This includes opportunities for science and education.
- make an ecologically coherent contribution in both inshore and offshore areas, ensuring an equitable proportion of HPMA are designated in both regions.

## **Questions about the HPMA Draft Site Selection Guidelines**

**Question 8. What is your view of the proposal that HPMA site identification should be based upon the “functions and resources of significance to Scotland’s seas,” as set out in Annex B of the draft Site Selection Guidelines?**

Blue Carbon: Support

Essential Fish Habitats: Strongly support

Strengthening the Scottish MPA network: Support

Protection from storms and sea level rise: Neutral

Research and education: Strongly support

Enjoyment and appreciation: Support

Other important ecosystem services: Strongly support

### **Please explain your answer**

The listed functions and resources are very human-centric, ecosystem-services. COAST considers that the overarching function for HPMA site identification should be ‘ecosystem protection, recovery and enhancement’ with other functions and resources nested under this. Ecosystem services are the intrinsic benefits that flow from well-functioning ecosystems, biodiversity and habitats.

We consider that ‘biodiversity recovery and enhancement’ and ‘habitat diversity and integrity’ should be specifically identified as additional functions/resources of significance to Scotland’s seas that are used to inform site identification.

There need to be clear criteria and targets for the functions and resources to guide the site selection process. Evidence of past biodiversity loss and ecosystem degradation and targets for national and international environmental obligations (such as Good Environmental Status and Sustainable Development Goals) should form part of the evidence that informs the identification of criteria and targets.

**Question 9. What is your view of the general principles that are intended to inform the approach to HPMA selection, as listed below and set out in section 4.1 of the draft Site Selection Guidelines?**

Use of a robust evidence base: Strongly support

HPMA scale and the use of functional ecosystem units: Support

Ensuring added value: Support

Delivering ecosystem recovery: Strongly support

### **Please explain your answer**

HPMAs are one particular form of spatial management that can be established to contribute towards achieving ecosystem recovery and enhancement. Whilst we consider that HPMAs have an important role in helping deliver ecosystem recovery and enhancement, if they are developed in isolation, or only as part of the existing MPA network, this will severely limit what they can be expected to achieve.

There needs to be a coherent, joined-up approach to achieve ecosystem protection, recovery and enhancement in Scotland’s seas. Such an approach needs to establish an ecosystem-based approach with coherent spatial measures that (i) addresses the reasons for past biodiversity loss and degradation of the marine environment, (ii) implements change to address that and (iii) has a clear view of the outcomes that define success in terms of biodiversity and ecosystem recovery.



There need to be clear and relevant criteria and targets that define the Scottish Government's vision for Scotland's marine environment (i.e. 'clean, healthy, safe, productive and diverse, and managed to meet the long-term needs of nature and people') that are applied to management of all sectors as well as site selection for HPMA. Without this clarity, 'ecosystem recovery and enhancement' is a nebulous and undefined concept and begs the question of how will we know if we have achieved it.

Without a more comprehensive framework to achieve ecosystem recovery and enhancement and sustainable use of Scotland's seas, we will continue to fail to achieve national and international obligations and fail to deliver to future generations a marine environment that is as healthy and resilient as possible.

We support the use of biogeographic areas to assist the site selection process within an over-arching Scotland-wide framework. Targets for ecosystem recovery could be established for biogeographic areas (within an over-arching national approach) enabling regional issues of biodiversity loss and habitat and ecosystem degradation to be specifically addressed.

### **Draft general principles**

In relation to the draft guiding principles we have the following comments:

- delivering ecosystem recovery should carry most weight as a general principle
- 'biodiversity and habitat recovery' should additionally be identified as a general principle as this underpins delivery of ecosystem recovery.
- the general principles should include the need for HPMA to be integrated within a broader spatial management approach to deliver biodiversity and ecosystem recovery and enhancement. The exploration of other spatial measures, such as low impact zones, in conjunction with HPMA site selection, is necessary to ensure that HPMA are developed as part of a coherent approach to addressing biodiversity loss and ecosystem degradation and protecting blue carbon habitats. Evidence from the marine protected areas at the Isle of Arran (Lamlash Bay No Take Zone and the South Arran Marine Protected Area) demonstrate the benefits of a tiered spatial management approach with a more strictly protected area within a much larger low impact zone where things such as lower impact fishing (creeling and hand diving) can occur but more damaging activities such as bottom towed trawl and dredge fisheries are prohibited or confined to specific areas.

We are pleased to see reference to the inclusion of knowledge exchange between scientists and sea users to contribute to the evidence base used for HPMA site selection. It would be helpful to have more clarity on how this is intended to happen and whether there are opportunities within subsequent steps of the HPMA process for additional data capture and inclusion.

Whilst we support the principle of HPMA adding value, there needs to be greater clarity about what the 'ensuring added value' principle is intended to cover and what the criteria are for assessing it.

**Question 10. What is your view of the proposed five-stage site selection process, found in sections 4.2 and 4.3 as well as Figure 2 and Annex A of the draft Site Selection Guidelines?**

*No option selected*

### **Please explain your answer**

We consider that there are omissions in the proposed five-stage site selection process:

1. The degraded state of, and loss of biodiversity from Scotland's seas needs to be understood more widely within Scotland as this is at the heart of why biodiversity, habitat and ecosystem recovery are required. The problem of shifting baselines means that we come to accept the state of the environment as it is today as 'normal'. Whilst many within Scotland are aware that there is a biodiversity crisis, we do not think that

there is a good understanding of what this actually looks like, particularly in relation to the marine environment.

While the consultation documents refer to the biodiversity and the climate change crises, more information should be provided to explain clearly the loss and degradation in more detail and set this within the context of national and international targets and obligations we are failing to meet. It would be helpful for this information to be provided at more localised, regional scale, as well as nationally. For example, there is already a significant body of evidence for the Clyde marine region documenting the demise of the fin fish fishery primarily as a result of the poorly managed fisheries and widespread habitat damage depriving species of essential habitat areas for breeding, feeding etc. Achieving ecosystem recovery needs to address past biodiversity loss and habitat damage.

2. To establish criteria and targets for biodiversity, habitat and ecosystem recovery and enhancement. While we recognise that it might not be possible at this time to quantify fully what ecosystem recovery and enhancement should look, we think it is essential to establish targets so that the potential contribution of areas towards these can be assessed at site selection and then subsequently as part of future monitoring. We recognise that improving our understanding about what recovered ecosystems look like is likely to require revisions to targets in the future.

3. As we have responded to earlier questions, we consider that in order to be effective, HPMAs need to be integrated with other marine management measures as part of a coherent ecosystem-based approach to achieve biodiversity and ecosystem recovery. We consider that this should be an integral part of the site selection process, at least in the inshore area, to be looking at how HPMAs in conjunction with low impact buffer areas could be introduced. This would have the added benefit of helping address potential issues of displacement of activities as well as enabling Scottish Government to deliver on other obligations. In relation to fisheries, for example, this approach would support the Scottish Government's obligations to establish an ecosystem-based approach to fisheries management and support transition to lower impact fisheries (which would contribute to achievement of Good Environmental Status). The tiered spatial management provided by the marine protected areas at Arran provides an example of how this sort of approach could be applied in practice.

4. We are particularly concerned about the potential conflicts that could arise within communities and between sea users around HPMA proposals. In addition to the points made above, we consider that it is essential that the site selection process includes meaningful engagement with communities to discuss any HPMA proposals and explore options as to how HPMAs, along with other measures such as low impact zones, could be introduced to help mitigate potential impacts on certain sea users, realise social and economic benefits and at the same time contribute to biodiversity and ecosystem recovery.

The HPMA process needs to involve local sea users and the wider community from the start and enable open discussion to explore available evidence, options, and opportunities with those who will be most directly affected by the proposals. We recognise the urgency for marine ecosystem recovery, so this should not be a reason for stalling action to bring in marine protection, but our experience on Arran shows the importance of meaningful engagement with the community. Whilst complete agreement for individual HPMA proposals is highly unlikely, developing sites with greater community and other stakeholder support will deliver a more sustainable network of sites.

**Question 11. Do you have any further comments on the draft Site Selection Guidelines, which have not been covered by your answers to the previous questions?**

Why is the landward limit mean low water spring tides? It isn't clear why intertidal areas are being omitted from the process.

We would like to see conservation objectives for individual sites acknowledge and define that site's contribution to wider ecosystem recovery and enhancement.

If HPMA's are to successfully achieve their aims, they cannot exist in isolation from an integrated approach to marine management that delivers defined ecosystem recovery and climate change mitigation targets, and embraces the use of spatial measures. There needs to be a clear statement as to where we are currently in terms of the state of Scotland's marine environment, recognition that poor management of the inshore areas has led to habitat loss, biodiversity decline and degraded ecosystems, and clarity over what we are aiming for in terms of marine recovery. There is the opportunity to implement spatial management in inshore waters that integrates highly protected marine areas alongside other spatial measures to support sustainable use as well as deliver biodiversity and ecosystem recovery and social and economic benefits.

The network level assessment should also consider the connectivity of HPMA's and MPAs with other marine resource management initiatives to provide the greatest gains for ecosystem recovery and enhancement in Scotland's seas overall.

*COAST did not response to questions 12 - 19*

