NATIONAL MARINE PLAN REVIEW – CALL FOR VIEWS

SUBMISSION BY THE COMMUNITY OF ARRAN SEABED TRUST (COAST)

28/05/21

The Community of Arran Seabed Trust (COAST) is based in Lamlash Bay, on the Isle of Arran, North Ayrshire. We are a 25 year old, community-led charity with the aim of restoring an abundant and productive marine environment around the Isle of Arran and the wider Clyde region, for the socio-economic benefit of all. COAST have been successful in establishing the first No Take Zone (NTZ) in Scotland's seas (the first community-led NTZ in the UK) and achieving the statutory designation of the South Arran Marine Protected Area.

1. Have we considered the right set of "relevant matters"? Is there anything we have missed?

The relevant matters focus heavily on economic factors of one sort or another and, as such, the public attitude and concern for marine environmental and ecological matters are inadequately represented in considerations.

It is not just public attitudes and concerns that need to be more strongly expressed in policy documents. Biodiversity Loss and the impact of Climate Change are two major threats to the wellbeing, and ultimately survival, not only of people in Scotland, but to humanity and other species across the globe. While this might sound overly dramatic and potentially be seen as scaremongering, the trends of both these issues are going consistently in the wrong direction. These matters have rightly come to the top of environment agendas in the last few years but now need far stronger representation in policy documents. The fate of social and economic factors ultimately rests on ensuring we have a planet that supports our future survival; the rate of climate warming and continued loss of biodiversity highlight the increasingly urgent requirement for us to respond to these issues, and addressing them needs to be at the forefront of national policy frameworks, marine or otherwise.

Climate change

Blue carbon habitats (such as carbon storage hotspots in marine sediment and carbon uptake by other marine habitats) should be given strong consideration within the NMP; protecting these habitats will provide substantial benefits to both the environment, economy and society.

Work must be done to address the conflicting policy priorities and objectives, in particular with regards to oil and gas which are clearly incompatible with the net-zero goals of the Scottish Government.

Blue Economy Action Plan

Defined as "*Sustainable use of ocean resources for economic growth, improved livelihoods and jobs, and ocean ecosystem health*", the blue economy needs to be linked to addressing the current biodiversity crisis. Biodiversity loss is key policy issue, with the urgent need to address this reflected in Scotland's Marine Assessment 2020. COAST consider that the Scottish Government needs to give serious consideration to the benefits of No Take Marine Reserves and other proactive spatial management measures to protect seabed habitats in future revisions of the NMP, given their proven record in increasing biodiversity, improving ecosystem and ocean health and supporting coastal community livelihoods.

Anything missed?
Biodiversity loss should be specifically identified as a relevant matter.

COAST believe that global developments in technology, particularly on the topic of Aquaculture and within the seaweed industry, warrant careful and close consideration in a revision of the NMP.

Throughout the plan there is a clear lack of hierarchy between most objectives and lack of consideration for cumulative impacts which need to be addressed. As we have already commented, the all-encompassing impacts on society, economy and environment from the climate crisis and biodiversity loss make these matters of the utmost importance to Scotland as a whole. If we don't address these, Scotland's marine environment will not be in a fit state to deliver a blue economy action plan or to support post Covid recovery. The Scottish Marine Assessment 2020, while not intended to be an assessment of the NMP specifically, clearly shows there are still many serious environmental matters to be addressed.

2. Do you agree that these matters and their impact on the management of co-existing activities in the marine environment point to the need to begin work to replace the NMP?

COAST consider that there is work that needs to be undertaken to revise the current National Marine Plan. This should be a refresh of the plan, not a complete redrafting of the plan, and needs to focus on addressing the identified shortcomings of the current plan. It is necessary that this refresh is completed promptly rather than waiting for a full replacement of the plan or another three-year review. The focus should be on renewing the plan in light of the climate change and nature crises and to support a greater ambition for ocean recovery that will ultimately support the economic and social aspirations of the NMP.

This said, work to revise the NMP must not be used as an excuse for inaction to carry forward the current commitment to the Priority Marine Feature (PMF) review and establishing effective spatial management of damaging inshore fisheries; reference: General Policy 9(b) "*Development and use of the marine environment must not result in significant impact on the national status of Priority Marine Features*". the long-awaited 'Improving protection given to Priority Marine Features outside the Marine Protected Area network' project needs to be taken forward without any more delay, with assurances of a full, open consultative process that takes into account the views of all stakeholders.

Additional Comments
The National Marine Plan Review 2021 states that "*The Scottish MPA network covers approximately 37% of our seas*" Given that a significant proportion of these MPAs do not have effective and enforceable management regimes in place, COAST contend that this should read "*The Scottish MPA network covers approximately 37% of our seas* ***on paper***". Only 5% of Scotland's coastal waters are protected from bottom-trawling and scallop dredging and the Government's own studies show that MPAs have reduced the footprint of bottom-towed fisheries by only 1%. Such failure to protect inshore habitats actively works against protecting natural climate change mitigation and exacerbates biodiversity loss. This serves as a clear example as to why the NMP needs to be refreshed so that it provides the constructive framework and policy leadership required to recover Scotland's seas and enable the societal and blue economy aspirations to be realised.

Community of Arran Seabed Trust
28 May 2021