



ANIMAL CONCERN

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Monday, 08 January 2007

Ms Nikki Milne,
SEERAD,
Marine Management Division,
G-H93,
Victoria Quay,
Edinburgh EH6 6QQ

Coastal and Marine National Park Consultation

Dear Ms Milne,

I write on behalf of the pressure group Animal Concern and the charity Save Our Seals Fund to make a joint submission to the above consultation.

It is a great pity that previous administrations have not taken the protection of our marine environment seriously. Had they done so the marine aquaculture industry would not have been allowed to expand without control causing severe damage to the seabed, pollution of coastal waters with chemicals, faeces and sea lice and the widespread destruction of marine mammals and birds which predate on the fish and shellfish reared on a commercial scale. Had this industry been controlled we would not have fish farms situated at the mouths of rivers with important migratory salmon and sea trout populations or close to known seal haul-outs and breeding grounds. We would not have mussel farms in lochs which have, or at least had, populations of diving duck which feed on mussels.

If there was political will to protect our wildlife and environment our aquaculture industry would be legally compelled to use existing non-lethal predator control methods instead of cheaper, lethal means.

Had politicians cared for our marine heritage they would not have allowed trawlers to dredge through our fragile coral reefs turning them into underwater deserts. They would have controlled and limited commercial fishing efforts before it was too late for most fish stocks in the North Sea. They would have realised that allowing unlimited catches of deep sea fish off our west coast was a recipe for disaster especially as some of the species targeted take twenty years or more to reach spawning age.

If the Scottish Executive truly takes the environment seriously they would create a fully resourced Ministry for the Environment instead of coupling the post with that of Rural Development and making Scotland look ludicrous by having our Minister for the Environment lobbying for better catch quotas for fishermen instead of supporting calls for real protection for fish stocks which are close to extinction.

It is wrong to try and identify one or two areas of special significance and give them added protection when the whole of our marine environment is under threat. Our entire coastal environment, from the uppermost tidal reaches of our rivers and sea lochs to the limit of our legal jurisdiction, deserves to be given proper protection.

If you give one area special status what is to stop damaging industries moving a few miles up the coast to avoid any restrictions? If it is wrong to damage the seabed by dredge trawling for scallops off the coast of say Islay then it is just as wrong and damaging to allow such trawlers to damage the seabed off Orkney. If you tell a salmon farmer that he or she cannot site cages near the mouth of an Argyll salmon river is it less damaging for the lice infested cages to be moored near a sea trout run in Lewis?

Marine energy production, aquaculture, ecotourism, commercial fishing and other industries such as harvesting of seaweed, shellfish and angling baits all have the potential to cause damage no matter where they occur.

We should treat all of our coastline as environmentally sensitive and ensure that all industries work in sustainable harmony with the ecosystem. Having uniform standards for planning permission and environmental protection around all our coast would make it easier to protect our ecological heritage.

Animal Concern and the Save Our Seals Fund believe the establishment of a delineated Coastal and Marine National Park would be ineffective and inadequate in protecting our fragile marine environment and the wildlife which inhabits it. Instead we urge the Executive to implement measures to protect Scotland's entire coastal and marine habitat from pollution and unsustainable exploitation.

Yours sincerely,



John F. Robins,
Campaigns Consultant to Animal Concern & Secretary of Save Our Seals Fund