

## Response ID ANON-FB69-QX1W-8

Submitted to Scottish Highly Protected Marine Areas (HPMAs)  
Submitted on 2023-04-17 15:57:17

### 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 in the text box:

It seems like common sense to create HPMAs to restore biodiversity and fish stocks. But it would have been helpful to see more published evidence (what size do they need to be, what sort of species relevant to Scotland would benefit most, what timescale they need to be in place to show benefits, how far out do benefits seem to extend, is there benefit in buffer zones with slightly less strict protection). Also some justification for the 10% figure: and if that relates to 10% of each type of fishery/ecosystem or just 10% of the sea overall

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 HPMAs?

Management approaches to activities - Commercial fishing (of any kind):  
Strongly support

Management approaches to activities - Recreational fishing (of any kind):  
Oppose

Management approaches to activities - All other recreational activities:

Management approaches to activities - Finfish aquaculture:

Management approaches to activities - Shellfish aquaculture:

Management approaches to activities - Seaweed harvesting:

Management approaches to activities - Oil and gas sector:

Management approaches to activities - Renewable energy:

Management approaches to activities - Carbon capture, utilisation and storage:

Management approaches to activities - Subsea cables:

Management approaches to activities - Aggregate extraction:

Management approaches to activities - Ports and harbours:

Management approaches to activities - Shipping and ferries:

Management approaches to activities - Military and defence:

Management approaches to activities - Hydrogen production:

Management approaches to activities - Space Ports:

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

This is a bit confusing. I don't know how effective the approaches to manage the activities will be, but the regulatory intent should be to exclude everything except recreation in terms of active use. So undisturbed cables fine but drilling for any purpose not.

It's hard to understand the ban on recreational 'catch and release' fishing. While there may be objections to this on animal welfare grounds it's hard to see how it's a problem for fish stock recovery. And it sends a message that the Government doesn't trust people to put the fish back. But without trust it's going to be much more difficult to monitor and enforce these zones

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."

Neutral

Please explain your answer in the text box:

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."

Neutral

Please explain your answer in the text box.:

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."

Neutral

Please explain your answer in the text box.:

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."

Neutral

Please explain your answer in the text box.:

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

Please add your response in the text box:

While the overall intention is good, the communication of that intention is poor. The goal is 'more fish (and other species) in the sea' - as well as more green jobs around our coasts. But it comes across as 'what we are going to stop you doing' - which is why the consultation has managed to unite disparate voices against it.

It would be helpful for government to be less prescriptive with the timetable. Getting it right in 2027 is much better than getting it wrong in 2026.

The NMP2 process seems much more engaging, yet the two processes seem to be separate

## Our Commitment

Question 19 Do you have any further thoughts on the Scottish Government's commitment to introduce HPMA's to at least 10% of Scottish waters?

Please add your response in the text box:

As stated above, the overall intention is good (though it's not clear if 10% is too much, too little or about right in relation to delivering the goals (which are not clearly quantified))

It's a real pity that the issue has been polarised, as there's a broad consensus on the principle of HPMA's

The invitation to submit third party proposals is helpful. It would be good to give this longer, and to hold off top down site selection and assessment for now. Perhaps communities/smaller organisations could apply for funds/get independent support to develop their proposals. Also in other contexts like this there is typically some form of compensation/just transition when people's rights or traditional practices are being changed. Those most likely to be affected for better or worse are also best placed to make this work - but there's work to be done to get the body of the Kirk back onside.

## About you

What is your name?

Name:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Nourish Scotland

Sector and origin

Environmental Non-Governmental Organisation

If you selected 'other' please describe your sector in the text box:

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

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 Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent