Inshore Marine Protected Area and Priority Marine Features Consultation

Response Guide and Evidence Brief

11/11/2026

Response guide

The best and most simple way to complete the consultation, in line with Our Seas positioning, calling for at least 30% of inshore waters to be protected from bottom trawling and dredging, uses three important steps.

Step 1: Download the response form from the Our Seas website

Step 2: Answer all the relevant questions using Our Seas messaging and providing personal anecdotes where possible

Step 3: Email your response form to marine_biodiversity@gov.scot

The form may look daunting, but we have narrowed it down to just the questions relevant to protecting the seabed.

Each site/area has three questions (unless stated otherwise due to one option being proposed):

- Do you support the fisheries management measures proposed for *** under Option 1 or Option 2?
- Do you have any comments about Option 1?
- Do you have any comments about Option 2?

Consultation Questions

You must fill in the personal questionnaire first.

Q1 - 4 are general questions about which option you support.

Then, the questions are asked on a site by site basis.

In order to protect all of our seabed from bottom trawling and dredging, you need to respond to the questions for sites and areas designated to protect a seabed feature. We have already seperated these out in the form you can download in step 1, but below we have also outlined them by marine region. Feel free to only choose those you have an interst in, or even better, all the question numbers on this page.

Argyll Region:

Sites: Q44 -45
PMF Areas: Q65-105

Clyde Region:

Sites: Q107 -109
PMF Areas: Q115-146

Forth and Tay Region:

Sites: Q148 -156
No PMF areas

Moray Firth Region:

Sites: Q167 - 169, 174 - 176
No PMF areas

North Coast Region:

No sites with a seabed feature
PMF Areas: Q194 - 195

Orkney Islands Region:

No sites with a seabed feature
PMF Areas: Q249 - 281

Outer Hebrides Region:

Sites: Q287 - 302
PMF Areas: Q331 - 390

Shetland Isles Region:

Sites: Q392 - 406
PMF Areas: Q446 - 479

West Highlands Region:

Sites: Q485 - 487, 496 - 498
PMF Areas: Q511 - 617

Our Seas Coalition's Position:

MPAs

Protect all seabed MPAs from bottom trawling and dredging to support healthy marine ecosystems, coastal communities and sustainable livelihoods.

Why...

Because the sedbed should be protected. Bottom trawling and dredging physically disturb the seabed, damaging species and reducing the abundance and diversity of marine life. Closing seabed MPAs to bottom-towed fishing allows seabed habitats to recover and provides the **strongest protection** for the features the MPAs were designated to conserve.

PMFs

Neither of the proposed PMF options will provide sufficient protections; they do not go far enough to help restore the seabed, allow marine ecosystems to recover or to support sustainable fisheries. We believe at least 30% of Scotland's inshore should be protected from more damaging fishing activities like bottom trawling and dredging, in line with the coalition's ask of a modern inshore limit adapted to the needs of each Scottish Marine Region.

Why...

Both proposed options are not adequate because:

- The areas are **not large enough** to provide real protection that is truly enforceable.
- Many populations of the 11 PMFs are **found outwith the proposed areas and therefore have no protection.**

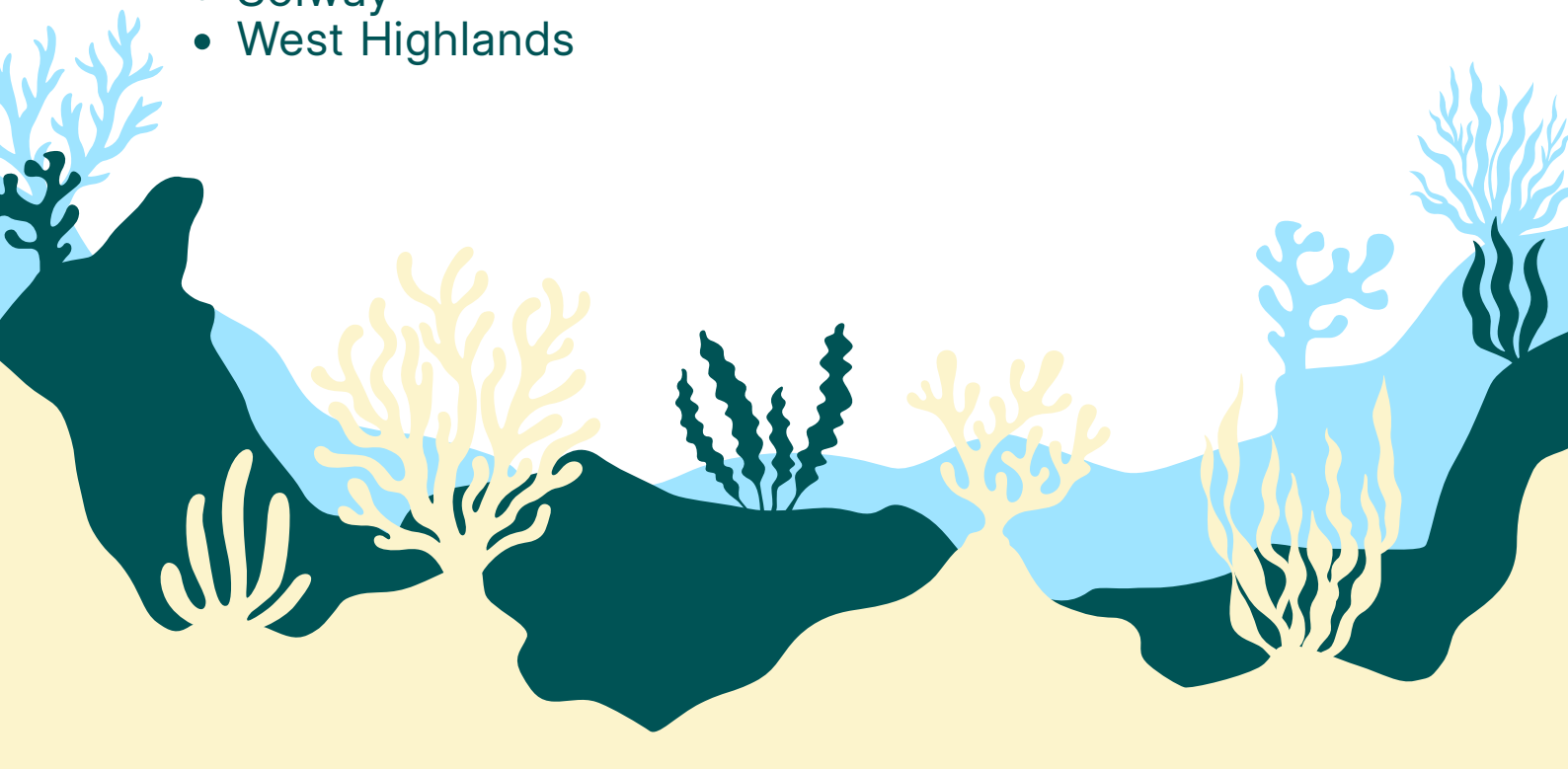
How to respond

If you agree with the Our Seas position, we will guide how on how best to respond!

It is important that, in your own consultation response, you provide personal reasonings and any evidence you may have. This is an itereative document and we will update it as we gather more evidence.

We have made regional briefings which outline all the sites designated to protect the seabed within the consultation. These can all be viewed in our resource hub.

- Argyll
- Clyde
- Forth and Tay
- Moray Firth
- North Coast
- North East
- Orkney Islands
- Outer Hebrides
- Shetland Islands
- Solway
- West Highlands



How to respond Qs 1 - 4

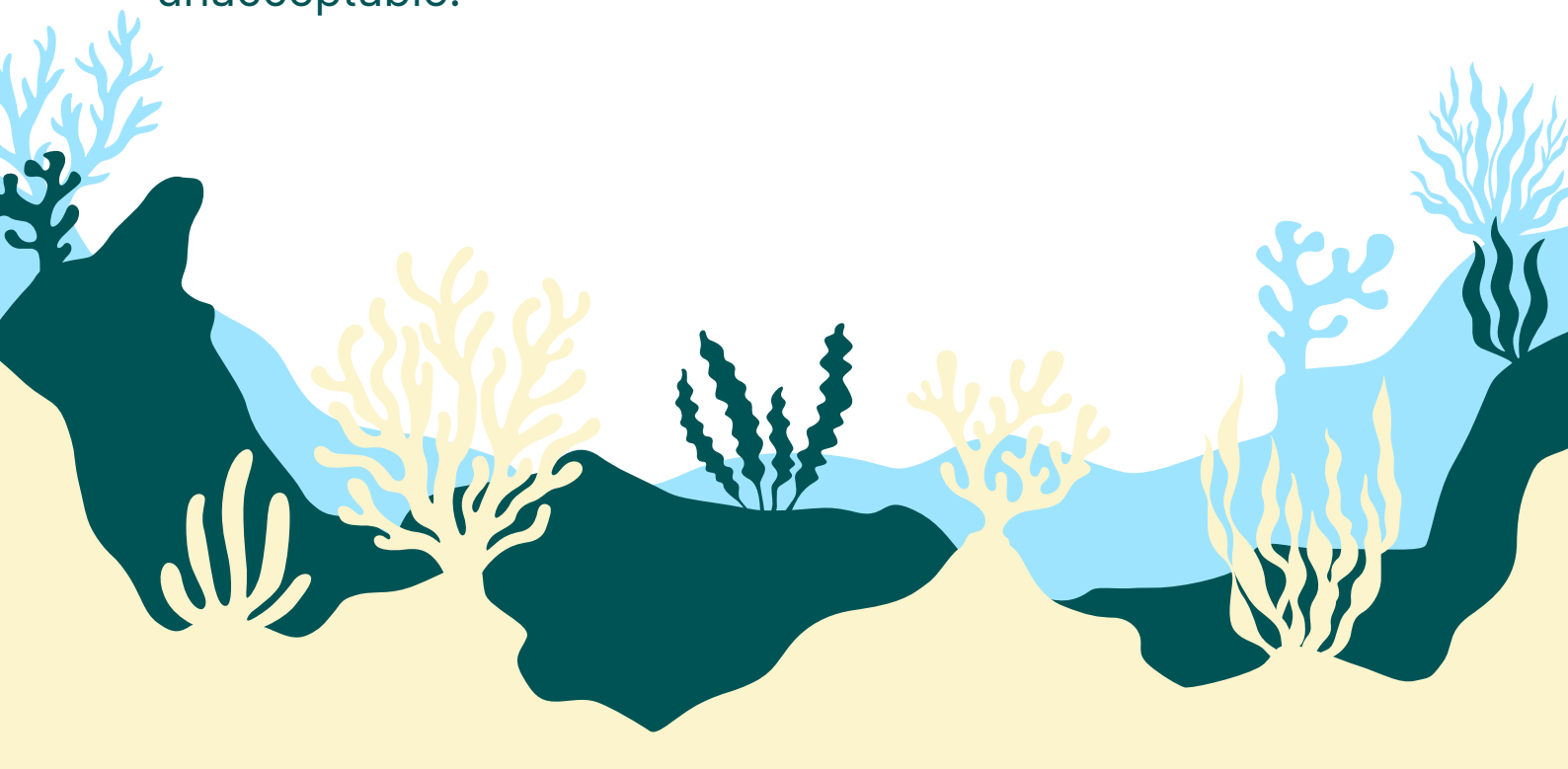
The first four questions are general questions about which option you support and why.

Q1. *Do you support or oppose the proposed Option 1 fisheries management measures for inshore MPAs and proposed PMF management areas?*

Our Seas suggest you **oppose** this option.

Why?
In most cases, Option 1 leaves large areas within Marine Protected Areas exposed to bottom trawling and dredging. This means, even though many of these sites were set up because they're home to important seabed habitats and species, many will still be exposed to damage under Option 1. We don't think this is acceptable.

Option 1 for Priority Marine Features (Scotland's most important species and habitats) would still leave large areas where these species and habitats have been recorded exposed to trawling and dredging. This is unacceptable.

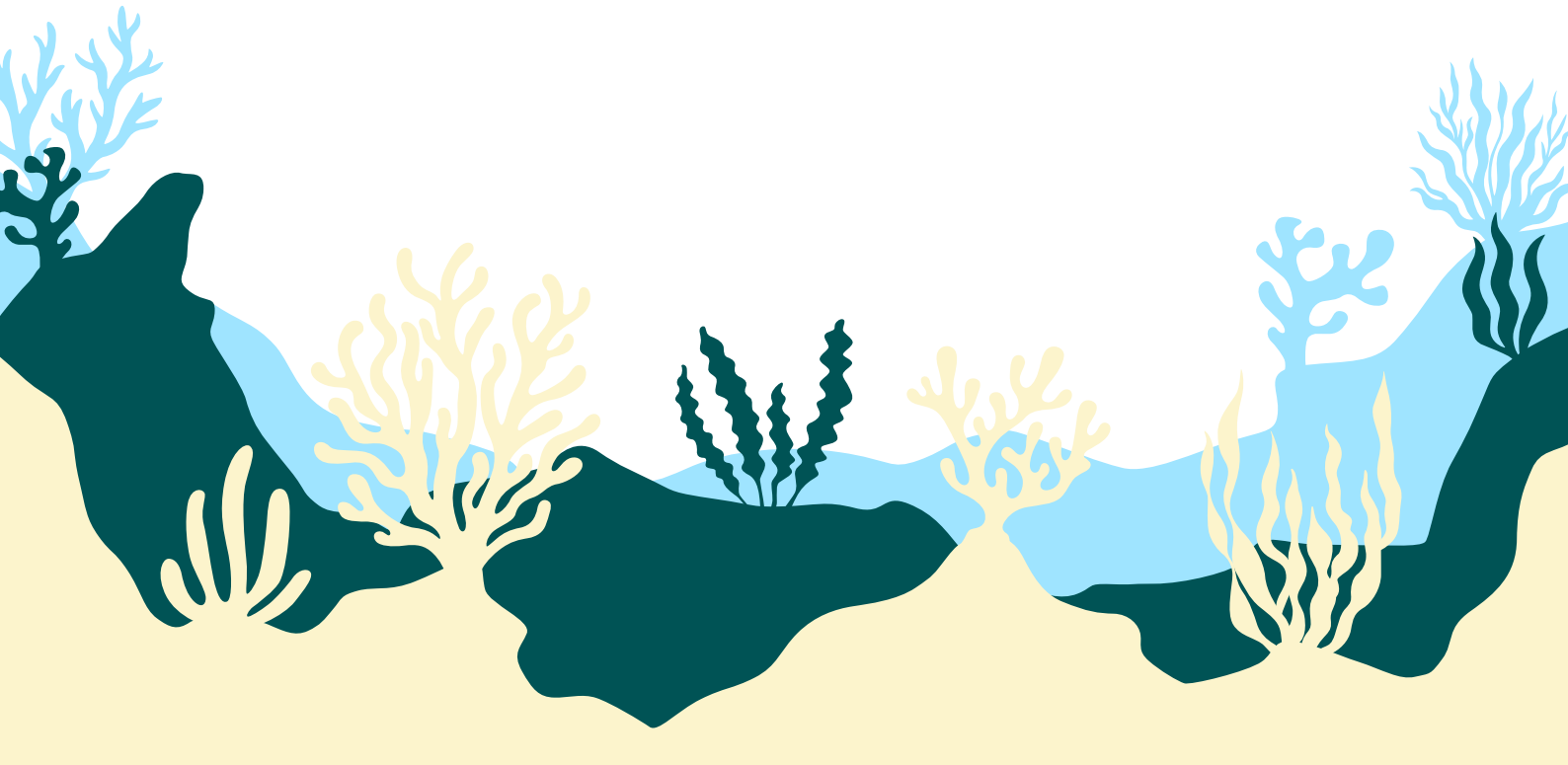


How to respond Qs 1 - 4

Q2. Do you have any comments on the proposed Option 1 zonal fisheries management measures?

*I*n your words, your response to Q2 might refer to any or all of the following issues:

- A personal anecdote about why you care about nature decline
- When a protected area has been designed because of its important seabed habitats, the whole site needs to be protected from trawling and dredging
- The loss of habitat and nationally important species, if only a fraction of the site is protected
- The need to leave nature alone to allow for recovery, benefiting marine life, coastal communities and sustainable businesses
- Option 1 fails to meet even the government's own commitments and marine plan
- Proposed areas for Scotland's most important habitats and species (PMFs) are too small (less than 1.05% on the inshore), with no 'buffer' between these important habitats and fishing activity
- Option 1 proposals are practically unenforceable.



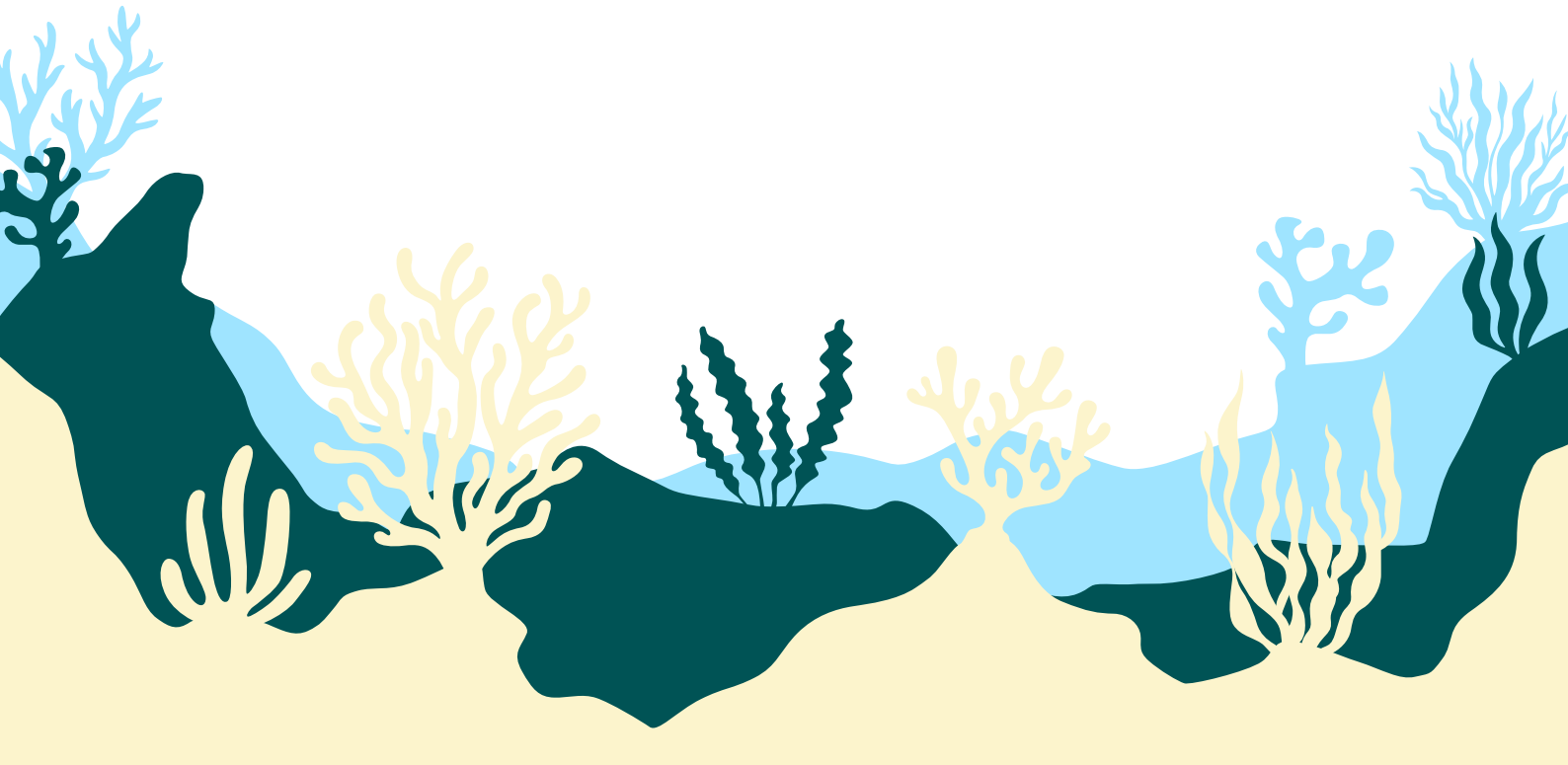
How to respond Qs 1 - 4

Q3. Do you support or oppose the proposed Option 2 fisheries management measures for inshore MPAs and proposed PMF management areas?

Our Seas suggest you **support** this option, with some caveats.

Why?
Our Seas support Option 2 proposals which close entire MPAs to trawling and dredging (e.g. Fetlar). But we cannot support Option 2 proposals for protected areas if some forms of more destructive fishing are still allowed (e.g. Clyde Sea Sill).

For Priority Marine Features, Option 2 protects slightly bigger areas than Option 1, but critically it still leaves out many of the most important, yet fragile habitats and species. While we would prefer Option 2 to no protection at all, it still doesn't go far enough.

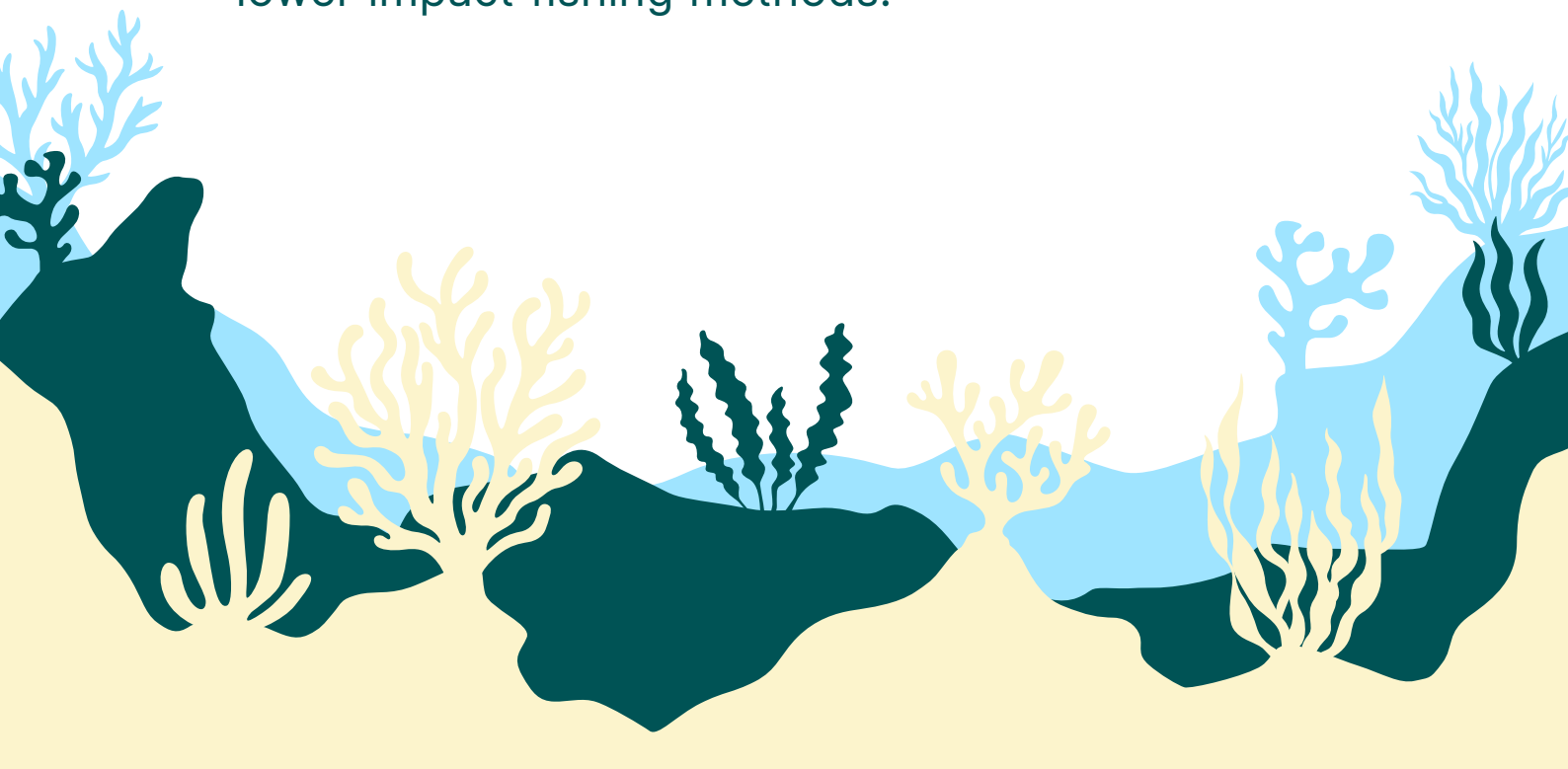


How to respond Qs 1 - 4

Q4. Do you have any comments on the proposed Option 2 full site fisheries management measures?

In your own words, your response to Q4 might refer to any or all of the following issues:

- When a protected area has been designed because of its important seabed habitats, the whole site needs to be protected from trawling and dredging.
- The seabed supports the wider marine ecosystem - by providing shelter, spawning/nursery grounds and food for a range of species (including those we eat!)
- At least 30% of the seas need to be protected.
- Share how you or your wider community might be impacted by a lack of meaningful protection (e.g. how will nature loss impact your business or your connection to the natural world?)
- Option 2 only provides the minimum level of management needed for meaningful seabed recovery, but we think the Scottish Government could go further
- Impacted fishermen need to be supported, either through compensation or support to transition to lower impact fishing methods.



How to respond - MPAs

The questions then move on to be site specific.

If you agree with the Our Seas position, we suggest you respond as follows for MPA sites...

Support the single proposed measures under Option 1 for:

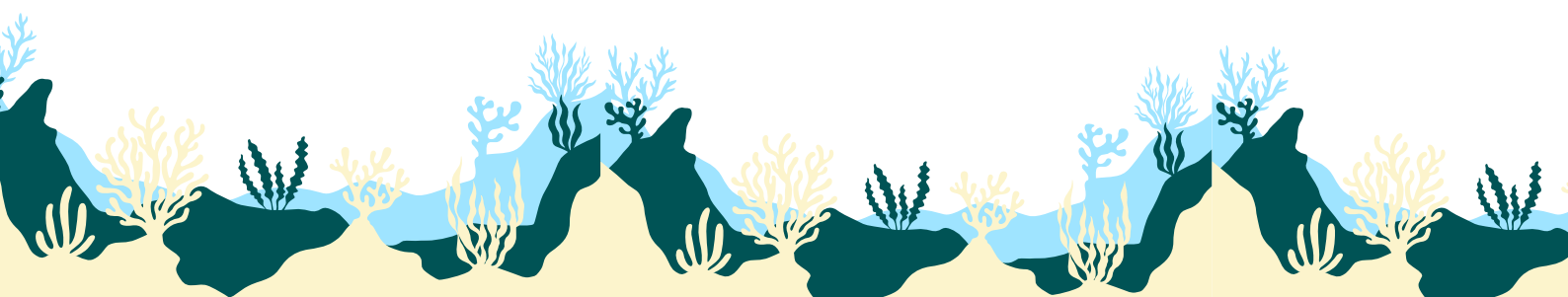
- Firth of Tay and Eden Estuary SAC,
- Isle of May SAC,
- North Rona SAC and Sound of Barra SAC

Support Option 2 for the following MPAs:

- Fetlar to Haroldswick NCMPA
- Shiant East Bank NCMPA
- Small Isles NCMPA
- Southern Trench NCMPA
- Berwickshire and North Northumberland Coast SAC
- Dornoch Firth and Morrich More SAC
- Loch nam Madadh SAC
- Moray Firth SAC
- Mousa SAC
- Papa Stour SAC
- Sound of Arisaig SAC
- Sullom Voe SAC

Reject option 1 and option 2 and propose a full site closure to all bottom towed gear for the following MPAs:

- Clyde Sea Sill NCMPA
- Moine Mhor SAC
- North East Lewis NCMPA



How to respond - PMFs

If you agree with the Our Seas position, we suggest you respond as follows for PMF sites...

For every PMF management area you should:

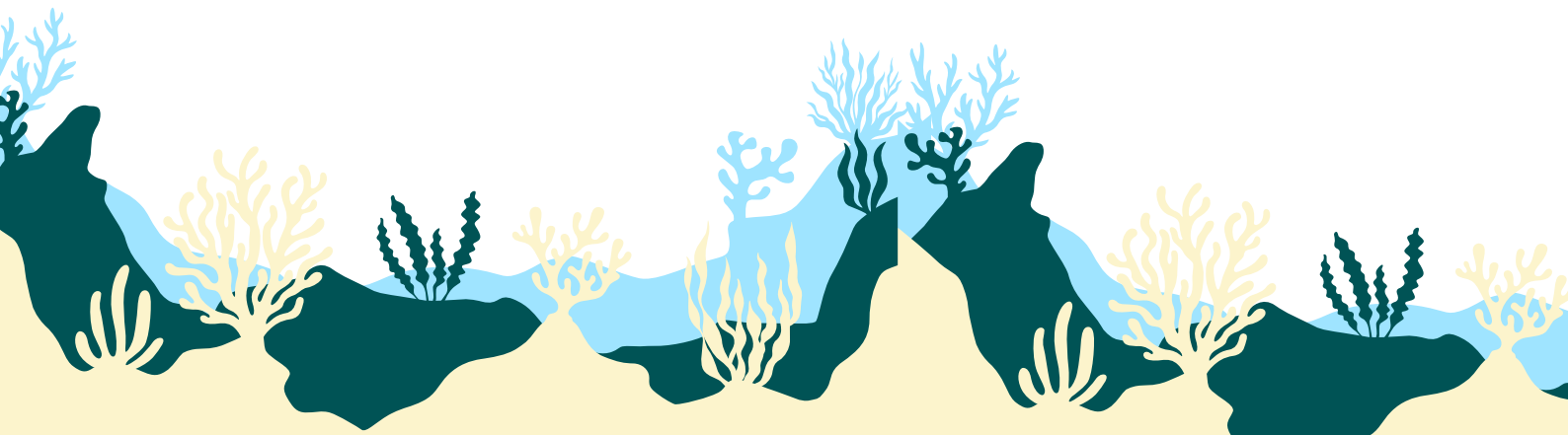
Support Option 2 at a minimum

In the comments box you should then state...

You support option 2 at a minimum. We then **strongly** encourage you to **also ask for at least 30% of** Scotland's inshore waters to be **protected** from the more damaging fishing activities like bottom trawling and dredging, in line with the coalition's ask of a **modern inshore limit adapted to the needs of each Scottish Marine Region.**

If you want to go into more detail, Our Seas suggests this could look like:

- **In the West Highlands Marine Region no dredging or trawling within 3 nautical miles of shore.**
- **In the Outer Hebrides Marine Region no dredging or trawling within 1 nautical mile of shore.**
- **As Shetland has it's own Regulatory Order, leave it to to resolve it's own protection.**
- **Throughout the rest of the Scottish Marine Regions, no dredging or trawling within 1 nautical mile or waters shallower than 45/50m.**

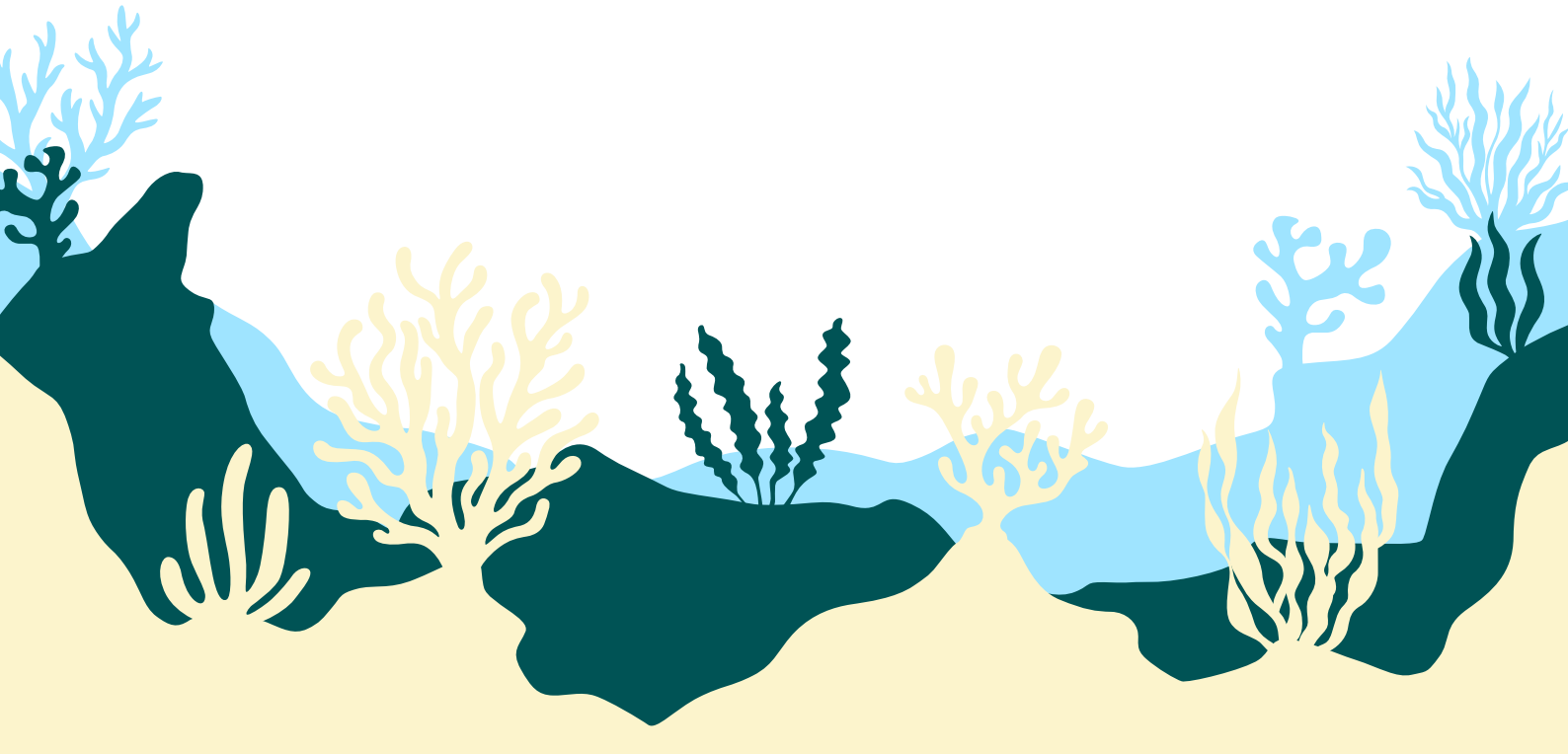


How to respond - PMFs

A modern verision of the inshore limit which is tailored to the community and ecological needs of each Scottish Marine region, is a viable option to suggest. It **would provide far stronger protection** than the proposed PMF management areas which are simply not adequate.

The areas proposed in this consultation will not be able to be properly enforced.

However, a variable limit surrounding Scotland's coastline would **contribute to at least 30% of Scotland's inshore waters being protected from more damaging fishing practises** and provide our coastline with the space for recovery it so desperately needs.



Evidence - What protection can look like...

On the Isle of Arran, Scotland's only No Take Zone and wider South Arran MPA show how effective marine protection can be, with bottom trawling and dredging restrictions helping to protect and restore the seabed.

Research has found increases in king scallop and lobster numbers, greater marine biodiversity and healthier habitats, while supporting local communities through activities such as diving, snorkelling and commercial scallop diving. Go to COAST's website to read more.



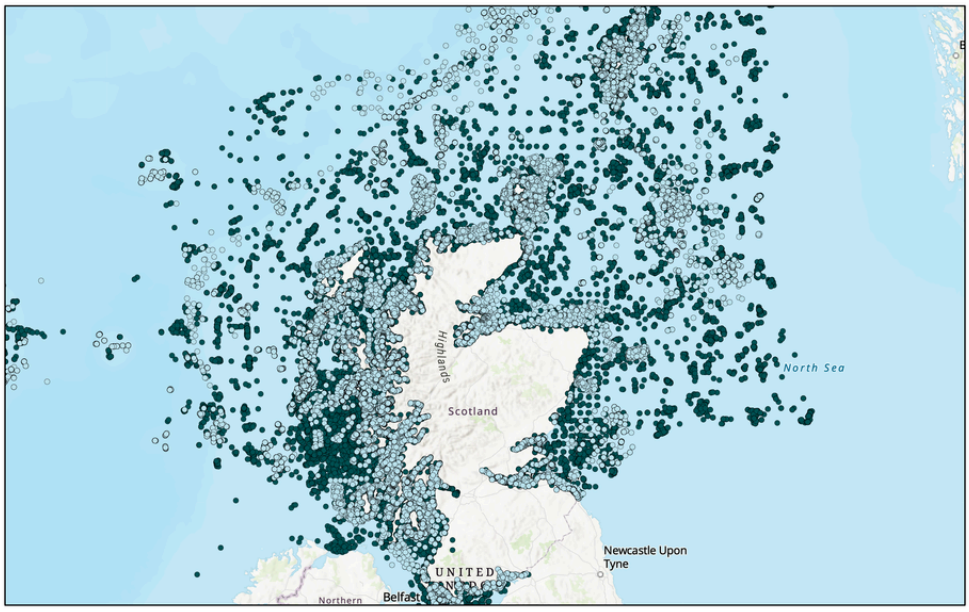
📷*Howard Wood - COAST: A before and after of the seabed once protection came into place*

Evidence:

81 versus 11 PMFs

To start with, the government designated 81 priority marine features back in 2014. Within this consultation, they are focusing on 11 and have currently made no commitment to look at the remaining 70.

PMFs in Scotland



10/21/2026

- Gems habitat point dataset
- Gems species point dataset

World_Hillshade

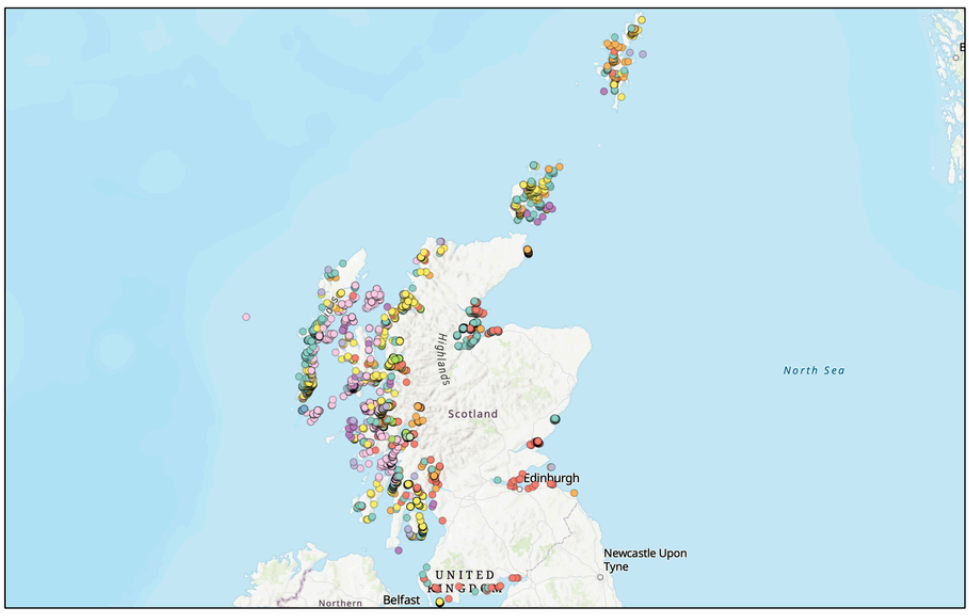
1:8,216,198

0 37.5 75 150 mi

0 60 120 240 km

Records consented for re-use under terms associated with either an Open Government Licence (http://www.nationalarchives.gov.uk/doc/open-

PMFs included in this consultation



10/21/2026

Priority Marine Features (10)_shp (1)

- Blue mussel beds
- Cold-water coral reefs
- Flame shell beds
- Fan mussel
- Horse mussel beds
- Maerl beds
- Maerl or coarse shell gravel with burrowing sea cucumbers
- Northern sea fan and sponge communities
- Seagrass beds
- Serpulid aggregations

World_Hillshade

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0 60 120 240 km

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, USGS

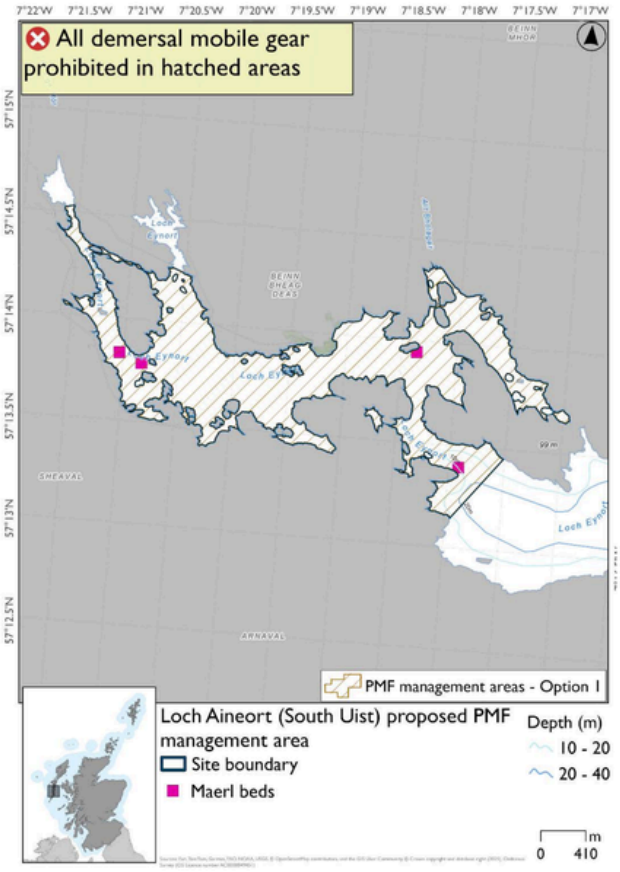
PMFs: Option 1 versus Option 2

As we stated earlier, Option 1 covers a **smaller** protected area around a PMF while Option 2 covers a **larger** area around a PMF.

However, we have found instances where Option 2 actually includes PMFs simply ignored in Option 1. Our Seas do not think this is okay.

For example, take a look below at Option 1 for Loch Aineort proposed PMF management area designated to protect maerl beds.

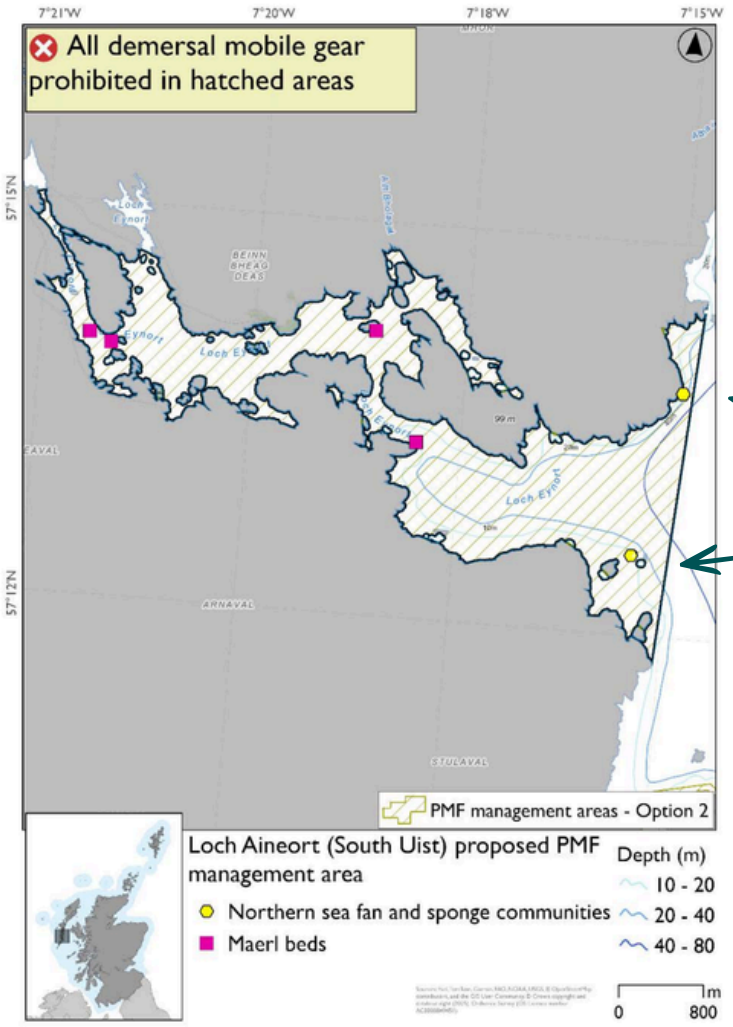
Figure 141. Map of measures proposed under option 1:



However, watch what changes when you look at Option 2 on the next page.

Option 2: This boundary covers a larger footprint that includes the outer mouth of Loch Aineort and two northern sea fan and sponge communities records which are not the primary focus for this area selection.

Figure 142. Map of measures proposed under option 2:



Ignored in option 1

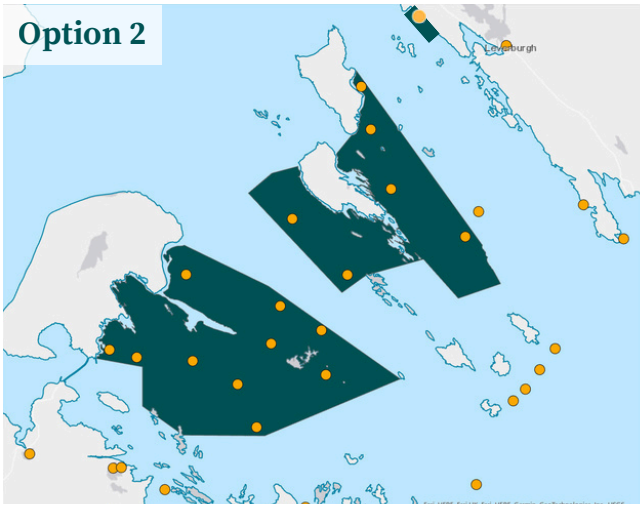
Option 2, covering a larger area, now includes an additional 2 populations of PMFs- 2 Northern Sea Fan and Sponge communities.

These were not included as they were not “the primary focus for this area selection”.

But shouldn’t we be protecting all Priority Marine Features??

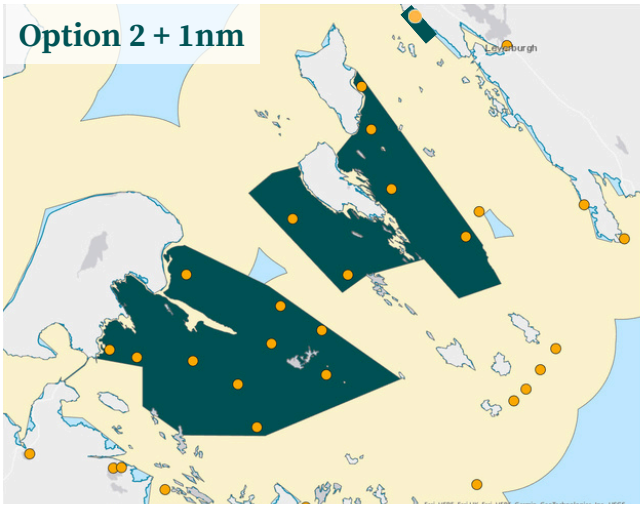
Then we have cases where the proposed PMF options do not even cover populations of the 11 PMFs included in this consultation.

Sound of Harris - 3 PMF areas



Under the proposed option

You can clearly see in the Sound of Harris there are dots that are simply not protected.



Under Our Seas Coalition's suggestion of a 1 nautical mile limit:

All PMFs in this area are protected from more damaging fishing practises such as bottom trawling and dredging.

Legend

- Priority Marine Features (PMFs)
- PMF site proposal areas
- 1 nautical mile inshore limit

Wider Failures - ESS

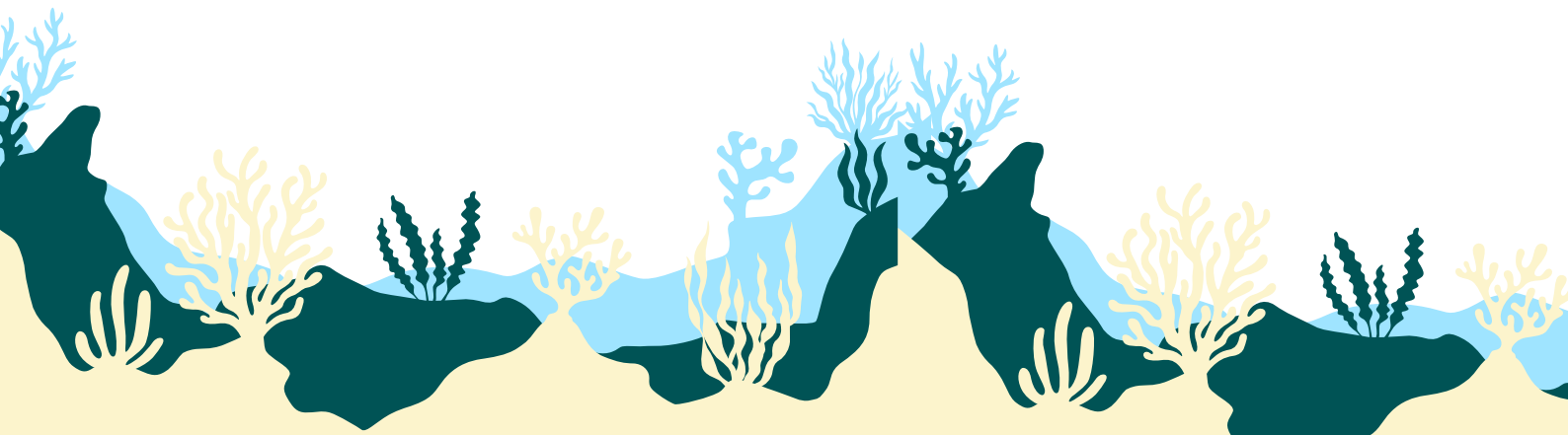
In June 2026, **Environmental Standards Scotland (ESS)**- an independent body set up to ensure Scotland's environmental laws are complied with- published a significant report into how the Scottish Government has implemented its legal duties to protect Scotland's seafloor.

Its conclusion was clear: the **Scottish Government failed its legal duty to protect the seabed**. In legal terms, it failed to achieve "Good Environmental Status" for the health of its seabed, despite a deadline of 2020 established by the Marine Strategy Regulations, replicated within the National Marine Plan, Biodiversity Strategy and elsewhere, and at the core of the post-Brexit 2020 Fisheries Act.

Perhaps more importantly, ESS concludes that this is not simply because marine recovery is difficult or takes time. It finds that Scottish Ministers have failed to effectively implement the things they said they would.

The ESS report identified 3 key failures;

- Scottish Government has failed to develop a good enough "Programme of Measures" (essentially an 'Action Plan') that demonstrates how Scotland will actually protect its seabed and help it recover;
- Scotland is failing to properly monitor the condition of its seas, meaning there is simply not enough information to assess if legal targets are being met;
- Inadequacies in Scottish Government's governance arrangements have led to repeated delays of the implementation of measures.



The Our Seas Coalition

The Our Seas coalition represents over 170 organisations, each with its own voice for the sea. We are united by a shared vision of greater protection for Scotland's inshore environment, however, individual members bring their own regional knowledge, priorities and perspectives on what that protection should look like. Consequently, our members will have their own individual views on the options presented within the consultation.

Our Seas encourage you to reach out to members in your area to learn more about their individual position.



Regional list

Aberdeenshire
- Ellon Sub Aqua Club
- OpenRoad Ltd
- Project Media
- Saltwater Life
- Shark and Skate Scotland

Angus
- Esk Rivers and Fisheries Trust

Argyll & Bute
- Argyll District Salmon Fishery Board
- Argyll Fisheries Trust
- Carna Coast and Communities
- Coastal Connection
- Community Association of Lochs and Sounds (CAOLAS)
- Conor Ryan Photography
- Craignish Restoration of Marine and Coastal Habitat (CROMACH)
- Eda Frandsen Sailing Ltd.
- Friends of the Sound of Jura
- Heart of Argyll Wildlife
- Kilchoan Estate
- Kyles Coastal Community
- Loch Visions
- Lochaber Sub Aqua Club
- Lochnell Oysters
- Majestic Line
- Mull Charters
- Oban Sea School
- Ocean Gives
- Puffin Divers
- Save Kintyre Seas
- Sea Freedom Kayaks
- Sea Kayak Argyll and Bute
- SeaTrek Scotland
- SeaWilding
- Sealife Adventures
- Tighnabruaich Sailing School
- Wild Argyll
- Wreckspeditions

Arran and Ayrshire
- Arran Eco Savvy
- Ayr Sea Angling Club
- Clyde Porpoise
- Community of Arran Seabed Trust (COAST)
- Fairlie Coastal Trust
- Kilmarnock Sub Aqua Club
- Mara Deli and Fish Restaurant
- Nature Library
- River Eachaig Syndicate
- Scottish Sea Angling Conservation Network
- Terra Mare

Berwickshire
- Berwickshire Marine Reserve
- Firth of Forth Lobster Hatchery
- Sea The Change
- Snorkel Wild
- The Scottish Coastal Cleanup

East Lothian
- Coast to Coast Surf School
- Lawson Wood Photography
- Ocean Vertical

Edinburgh
- Black House Water Sports
- Blue Marine Foundation
- Cycle For The Seas
- Earth in Common
- Fauna & Flora
- Fish Legal
- National Trust for Scotland
- Nourish Scotland
- Open Seas
- Pam van de Brug
- Project Seagrass
- Scotland The Big Picture
- Scottish Sub Aqua Club
- Staunch Industries
- Sustainable Inshore Fisheries Trust
- Young Sea Changers Scotland

Fife
- East Neuk Seaweed
- Scottish Federation of Sea Anglers

Glasgow & Inverclyde
- Centre for Human Ecology
- Click Book Stay
- Clyde Charters
- Ecodrama
- Ethical Seafood Research
- Friends of Dumbarton Foreshore
- GalGael Trust
- Loch Lomond Angling Improvement Association
- Sunny Side Ocean Defenders
- That's Yer Dinner

Inverness
- Beauly District Fisheries Board
- Heavy Metal Munchies
- Highlands and Islands Environment Foundation
- Keltic Seafare
- Lochaber Environment Group
- Old Town Fish & Chips
- Sauna Ostara
- Wild Rose Escapes
- WildFish

Moray
- Burghead Sub Aqua Club
- Findhorn District Salmon Fisheries Board
- Findhorn Nairn and Lossie Fisheries Trust
- Gordon Castle
- Spey Fishery Board

Orkney
- Kraken Diving
- Orkney Skate Trust

Outer Hebrides
- MARA
- Outer Hebrides Fisheries Trust
- Wild Harris

Perth
- Morven Stewart

Skye and Lochalsh
- All Things Cuillin
- Cast Away with Katie Tunn
- Dive and Sea the Hebrides
- Hayley Wolcott Art
- Islandeering
- Knoydart Foundation Ranger Service
- Raasay House
- Scottish Creel Fishermen's Federation
- Skye and Lochalsh Environment Forum
- Skye and Lochalsh Rivers Trust
- Skye Communities for Natural Heritage
- Skye Scallop Divers
- Skye Seas Survey Initiative
- Skye to Sea

Stirling
- Argaty Red Kites
- Freedom Diving

Wester Ross
- 58° North Seaweeds
- Ali Mac Candles
- Applecross Sea Rangers
- Atlantic Diving Services
- Isle Martin Trust
- James Curley Fly Fishing
- Johnston and Loftus Boat Builders
- Kayak Summer Isles
- Little Loch Broom Marine Life
- Loch Laxford Shellfish
- Mikytin Ltd
- Ockran Oysters
- Plastic at Bay
- Seaful
- Sea Change
- Shellfish Safaris
- Ullapool Charters
- Ullapool Outdoors
- Ullapool Sea Savers
- West Sutherland Fisheries Trust
- Wester Ross Area Salmon Fishery Board

Outside Scotland

England
- Angling Trust
- Blue Ventures
- ClientEarth
- Frogfish Photography
- Maryport Coast Aquarium
- Oceana UK
- Patagonia
- Project Baseline
- Sea-Changers
- Shark Guardian
- Source to Sea
- SubSeaTV
- Transform Bottom Trawling Coalition
- Wilderness Foundation

Northern Ireland
- Belfast Lough Sea Angling and Conservation Club
- Marine Conservation Northern Ireland
- Northern Ireland Federation of Sea Anglers
- Northern Ireland Fly Fishing Association

International
- Aquatic Life Institute
- Blue Planet Society
- Captain Paul Watson Foundation UK
- Clean Sailors
- Low Impact Fishers of Europe

