

## Written submission from Scottish Environment LINK

Scottish Environment LINK's marine taskforce have previously expressed concerns about the absence of an Appropriate Assessment for the National Marine Plan. We believe such an assessment is required namely – but not exclusively - due to the inclusion of ambitious targets for the growth of farmed salmon production in the Plan (Section 7, Objective 2, pg55 of the Plan).

The circumstances in which an Appropriate Assessment (forming part of a Habitat Regulations Appraisal) is required are clear:

*“An appropriate assessment (AA) is part of the [Habitats Regulations Appraisal \(HRA\)](#) process. It is required when a plan or project potentially affecting a Natura site:*

- *Is not directly connected with, or necessary to the management of the site for nature conservation, and*
- *Is [likely to have a significant effect](#) on the site (either alone, or in combination with other plans or projects).”<sup>1</sup>*

Marine Scotland have advised that a “draft Habitats Regulations Appraisal has been undertaken and the results of the screening have shown that an appropriate assessment of this Plan will not be required.” (Para 1.8, pg2, of the Plan). LINK members have repeatedly requested to see this draft assessment, but the document has not been made available.

On the face of it, this is a procedural point, but the substantive issue which underlies it, is of significant concern. By its own admission, the Scottish Government recognises that salmon fin-fish farming has impacts on the benthos, wild salmon, seals, water quality and a range of other pressures. Increased production by 2020 is therefore considered likely to have significant effects on Natura sites. Without being privy to the justification for screening the Plan out of an Appropriate Assessment, LINK remain deeply concerned that in this instance the precautionary principle has not been adhered nor has best practice been followed. In other examples the Government has consulted on the detail of the HRA prior to Plan adoption in an effort to keep the process open and transparent.

Without adequate assessment the National Marine Plan risks embedding an expectation amongst future marine planners of the Scottish Marine Regions that they should deliver growth in the Aquaculture sector prior to the consequences of such activities on the marine environment being fully understood.

Scottish Environment LINK's marine taskforce response to the original public consultation on the National Marine Plan (in August-November 2013): <http://www.scotland.gov.uk/Resource/0044/00440859.pdf>

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<sup>1</sup> <http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/international-designations/natura-sites/hra-appropriate-assessment/>

Scottish Environment LINK's marine taskforce briefing on the latest iteration of the National Marine Plan (December 2014):

<http://www.scotlink.org/public-documents/the-national-marine-plan-an-opportunity-to-enhance-our-marine-environment/>