

No	Consultee ID	Topic	Comment	Response
1	ANON-MWZN-Q8QZ-Z	Fishing activity	<p>The Area proposed for North side of St Kilda, encompasses one of the best haddock / Whiting areas, during the months Feb / March & April.</p> <p>What compensation is to be paid to those boat owners who have worked those grounds for generations, with no adverse impact on the species you claim you are seeking to protect</p>	<p>The classification of the pSPAs alone will not affect existing unregulated activities e.g. fishing. It is the manner in which the sites are managed to ensure that the conservation objectives for the qualifying features are achieved that has the potential to result in displacement of fishing activities. However, at present the range and scale of management measures that may or may not be implemented at each pSPA is not known and therefore it is not possible to determine with any level of certainty how future activities might be affected. Should any specific management measures be subsequently required to meet the objectives of the pSPAs, these will be subject to further consideration in a separate SEA.</p>
2	Shetland Islands Council	Reasonable alternatives	<p>Reasonable alternatives</p> <p>This states, at P41, "Three alternative scenarios (high, medium and low), which vary the inclusion of species as qualifying features at each pSPA, have been assessed." However, the Council is unable to find it described in the document, or in the accompanying network or species assessments what these scenarios are, what they refer to or what they mean. Simply stating that these scenarios are variations of numbers of species to be included is insufficient, bordering on arbitrary,</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>

			without adequate explanation. Is this variation based upon the network assessment where it discusses the categories used to set a minimum level of representation for each relative value derived from the conservation status attributes? Or something else?	
3	Shetland Islands Council	Reasonable alternatives	<p>Furthermore with respect to reasonable alternatives, in the Marine Proposed Special Protection Areas SEA Screening and Scoping Report, March 2018, other reasonable alternatives were discussed that do not feature here, namely:</p> <p>"The pSPAs are a means of designation to meet these conservation objectives, however, it is recognised that there may be other special conservation measures that could achieve the same outcomes. This could include the designation of marine habitats and species of conservation importance as Priority Marine Features. Currently there are 81 Priority Marine Features, many of which relate to the marine environment. Another reasonable</p>	A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.

		<p>alternative to meeting the Directive could be the development of an overarching conservation plan or action strategy, for example, a Seabird Action Plan."</p> <p>This SEA should (1) explain the scenarios, identify the chosen scenario and state why the others are alternatives to the course of action proposed. This is particularly important given that in the (low) scenario, the Bluemull and Colgrave Sounds pSPA would not be taken forward for classification. There would therefore no longer be EU Birds Directive protection afforded to this site and a potential for adverse impacts compared to the baseline. This SEA should also (2) address the possible alternative courses of action that were mentioned at the scoping stage.</p>	
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4	Shetland Islands Council	Reasonable alternatives	<p>Assessment of medium and low scenarios (Page 77)</p> <p>Under the "low" scenario (see my comments above) the qualifying feature (Red-throated Diver, RTD) would be removed from Bluemull and Colgrave Sounds pSPA and, as this is the only qualifying feature, this site would not be taken forward for classification. Is this scenario based upon the idea of distributing the minimum number of pSPAs to support each feature throughout the range of Scotland's Seas? If so, deletion of this pSPA could potentially leave the foraging range of the second largest population of Scotland's (and GB's) RTD with a lower level of protection from adverse development than other, significantly smaller populations, appearing to favour arbitrary distribution of pSPAs across Scotland's seas over size of populations in each area. The Northern Isles population of RTD, at 32% of Scotland's total should be the primary consideration here. Having said all this, I reiterate that I'm unclear as to what the scenarios actually mean or which one would be, or has been, chosen.</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>
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5	Shetland Islands Council	Reasonable alternatives	Finally, the SEA doesn't explicitly consider impacts of the scenarios on terrestrial populations - this is particularly the case for Bluemull & Colgrave Sounds in terms of the low scenario.	Noted. Consideration has been given to the potential for adverse effects of the new reasonable alternatives on terrestrial populations of birds in the updated Environmental Report.
6	Mark Carter	Fishing activity	A start in the right direction, however they appear not to include any 'No-Take-Zones', for a meaningful future for us, our kids and the environment we need 30% No-Take-Zones as recommended by the Royal Commission's Turning the Tide Report. Vast vitally important areas along Scotland's west coast have been committed a gross oversight and some would argue in appeasement to the commercial industrial scale industries. A sad reflection of today's greed over all else, when will government wake up, this is YOUR watch! How will you explain this travesty, potentially an ecosystem-wide destruction of Scotland's unique coastline and species biodiversity.	This consultation is on the classification of pSPAs and not the manner in which they might be managed in the future to meet the site's conservation objectives. Possible management advice options that may be applied at sites in the future include reducing/avoiding/prohibiting certain fishing activities as described in Table 2. The range and scale of any management measures that might be implemented are not currently known and therefore it is not possible to assess the significance of any environmental changes with any level of certainty. Should any specific management measures be subsequently required to meet the objectives of the pSPAs, these will be subject to further consideration under the Environmental Assessment (Scotland) Act 2005.

7	The Scottish Fishermen's Federation	Fishing activity	<p>The Scottish Fishermen's Federation (SFF) is pleased to respond to this consultation on behalf of the 400 plus fishing vessels in membership of its constituent Associations, The Anglo Scottish Fishermen's Association, Fife Fishermen's Association, Fishing Vessel Agents and Owners Association, Mallaig & North West Fishermen's Association, Orkney Fisheries Association, Scottish Pelagic Fishermen's Association, the Scottish White Fish Producer's Association and Shetland Fishermen's Association.</p> <p>SFF supports the principle of protecting seabirds' populations within the boundaries of the pSPAs.</p> <p>Nevertheless, we oppose any future management measures which could cause displacement of fishing activities if not provided by strong and sound scientific evidences and which would deviate from the original and unique goal of protecting the birds species.</p>	<p>Any future management measures that might be developed at the sites will be subject to consideration under the Environmental Assessment (Scotland) Act 2005. SFF will be consulted as part of any process to develop fisheries management measures and will be given the opportunity to provide feedback on any proposed measures and their potential to cause displacement of fishing activities.</p>
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			<p>For these reasons, we would welcome and recommend our involvement in the process of developing the related management measures.</p> <p>Furthermore, we advise that any attempt of opportunistic exploitation of this process, to benefit a sector over another or to pursue any other reasons not in its original scope, needs to be avoided.</p>	
8	The Scottish Fishermen's Federation	Fishing activity	<p>We also would like to draw attention on the fact that the status of the stocks and their management should be kept separate from the process of measures definition and proposal for the SPAs. Other mechanisms are in place to make sure that the stocks are exploited in a sustainable way.</p>	Noted.

9	RSPB Scotland	Reasonable alternatives	<p>RSPB Scotland are very supportive of the process to identify and classify marine SPAs for marine birds. We have engaged in this process for many years and would like to acknowledge the enormous amount of work that has been put into getting these sites to this point. We appreciate it has been a challenging process but we now need urgent progress to classify these SPAs by the end of the year. Notwithstanding this, it has been difficult to follow some of the decision-making process and we believe this has been hampered by the fact that the consultation reports for the pSPA consultations in 2016/17 have not been published. Comments on the SEA 1. There is no clarity on why the three reasonable alternatives where chosen and what they represent. These are not explained in the SEA or, explicitly, in the Network Assessment.</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>
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10	RSPB Scotland	Reasonable alternatives	<p>2. In our view the reasonable alternatives would have been more representative of the Network Assessment and the Advisory Panels advice as stated in the Network Assessment if the current High Scenario became the Medium Scenario and the current Medium the Low and a new High Scenario included a commitment to identifying and designating SPAs for those species that are under or un-represented by spatial protection. As it stands the features that would be removed under a Medium scenario are identified as 'species-seasons (that) could be considered for removal as qualifying features from their respective proposed SPAs' however the Advisory Panel fully supports the inclusion of the features that would be lost from a Low scenario.</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>
11	RSPB Scotland	Reasonable alternatives	<p>3. In Table 10 it states for some sites where species may be removed under a Medium or Low scenario that "the recommended management advice options remain the same'. However, it is not clear to us how this judgement was made? The management of these sites has yet to be determined, so it is premature to say the omission of a species will have no impact.</p>	<p>We agree that it is not possible to be certain if and how the recommended management advice options might be implemented under each of the reasonable alternatives. This is now reflected in the updated assessment of reasonable alternatives in the updated Environmental Report.</p>

12	RSPB Scotland	Mitigation	<p>4. The SEA claims to 'identify measures that are required to avoid or minimise any significant adverse effects and to highlight opportunities for enhancements of beneficial effects'. This is mentioned multiple times and is addressed in section 5.3. where it is stated that "No significant adverse environmental effects have been identified by the SEA" thus no measures are proposed. However, under the heading "What are the likely significant effects of the SPAs" one of the results of the SEA is that "Potential adverse environmental effects on areas outwith the pSPAs resulting from the displacement of activities and the intensification of activities in areas where they already occur". Yet there are no mitigations proposed to address this or information on how this might be assessed and addressed. Also, there are no 'opportunities for enhancement' highlighted.</p>	<p>No significant adverse effects have been identified by the SEA and therefore there are no mitigation measures proposed. Further clarification of the monitoring is provided in the updated Environmental Report (Section 5.5).</p>
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13	RSPB Scotland	Restoration	<p>5. Currently any reference to restoration is omitted from the SEA objectives for Biodiversity, Flora and Fauna and for Soils, which is a significant omission that needs to be addressed. This is despite the claim that SEA 'highlights opportunities for enhancements of beneficial effects'. Whilst sites have been identified as important for a range of marine birds, this does not mean that the habitat is in optimal condition; is not degraded; or that prey species are doing well in these areas. Therefore, it is necessary to include consideration of the restoration requirements for these sites, without which their long-term objectives to 'maintain' (or restore) seabird numbers may not be achievable.</p>	<p>The SEA objectives were presented in the Screening and Scoping Report and accepted by the Consultation Authorities apart from a minor amendment to the SEA objective for Soil. They are based on the SEA objectives used in the SEA of the Nature Conservation MPAs and amended to reflect the proposed scope and environmental protection objectives relevant to the present assessment.</p>
14	RSPB Scotland	pSPAs	<p>6. The SEA claims that there is 'local geographic replication' between East Mainland Coast, Shetland and the Orkney sites for red-throated diver (b), long-tailed duck (nb) and red-breasted merganser (nb). There is no definition of local geographic replication other than to say sites are in the "vicinity" of one another. We do not think it is correct to say that sites in Shetland</p>	<p>The SEA does not refer to local geographic replication of these sites. This comment is referring to the Network Assessment.</p>

			are in the “vicinity” to sites in Orkney where the respective pSPAs are well over a 100kms from one another.	
15	RSPB Scotland	pSPAs	It is our opinion that Scapa Flow and North Orkney pSPAs should be amalgamated into a single SPA as they contain a very similar suite of features and are ecologically connected. Amalgamating these sites into one could also simplify management consideration of development proposals and public understanding.	A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.
16	William M. Oswald	pSPAs	Are the 15 areas big enough and do we need more areas to be protected?	A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.

17	ANON-MWZN-Q8BR-9	Offshore renewables	<p>The purpose of SEA is to integrate overarching environmental objectives into plans and policies. One of these objectives should be tackling climate change through the reduction of carbon emissions. We are pleased to see that the introduction of the SEA recognises the impact that climate change is having on important bird species. However offshore wind is only referenced in terms a negative impact on species when it is a major contributor to the reduction in greenhouse gas emissions associated with climate change. The SEA correctly scopes in climate factors as an SEA topic however this topic is then viewed too narrowly. The focus is on biological carbon sinks such as seagrass beds and kelp forests and ignores the contribution that renewable energy can make to carbon emissions reduction which is arguably more important.</p>	<p>The purpose of the SEA is to assess the likely environmental effects that may arise from the proposals/plans such as the classification of the pSPAs, taking account of the nature and scale of changes, feature sensitivities, the baseline environment and expert judgement. The SEA therefore includes a review of the existing baseline environment and also a review of trends and pressures from activities (including offshore renewables) to give an indication of how the baseline environment might evolve in the absence of the proposals/plans (future baseline). The proposals/plans will not affect the contribution that renewable energy can make to carbon emissions reduction and therefore this has not been included in the scope of the SEA.</p>
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18	ANON-MWZN-Q8BR-9	Offshore renewables	<p>The SEA identifies in table 2 possible management measures including reducing collision and displacement pressures associated with offshore renewables. However it fails to address or recognise the overall environmental objectives of offshore renewable development which is a high priority EU environmental objective. We understand the potential conflict between having impacts on bird species and the benefits associated with renewable energy however this SEA does not deal with this at all which we feel is a significant weakness.</p>	<p>It is not the purpose of this SEA to specifically assess the impacts of offshore renewables on the environment. A new sectoral marine plan for offshore wind energy is being developed by Marine Scotland and the SEA for this plan is in the process of being undertaken which will consider these issues in detail (see https://consult.gov.scot/marine-scotland/offshore-wind-scoping/).</p>
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19	Scottish White Fish Producer's Association	Fishing activity	<p>This response is on behalf of the Scottish White Fish Producer's Association (SWFPA). SWFPA is a trade organisation representing approximately 230 vessels and 1400 crew members. SWFPA vessels operate across a range of sectors (whitefish, nephrops, squid, scallop, crabs and lobsters) with a total turnover of approximately €200M. SWFPA supports the principle of protecting seabird populations within the boundaries of the pSPAs. SWFPA notes the comment that "range and scale of management measures for fishing activities that might be implemented are not currently known and therefore it is not possible to assess the significance of any environmental changes with any level of certainty". With this in mind, SWFPA would be opposed to fisheries management restrictions that may be applied for any reason other than the protection of the specifically identified feature (seabird) within the pSPAs (in order to meet the obligations of the Birds Directive). Furthermore, it is vital that potential displacement of fishing activity through management measures is fully evaluated when measures are being considered so as</p>	<p>Any future management measures that might be developed at the sites will be subject to a separate SEA under the 2005 Act. SWFPA will be consulted as part of any process to develop fisheries management measures and will be given the opportunity to provide feedback on any proposed measures and their potential to cause displacement of fishing activities.</p>
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			<p>not to have detrimental environmental impact in other areas. SWFPA would welcome the opportunity to engage in the process of developing fisheries management measures, ensuring that any decisions taken are evidence based and do not take account of opportunistic attempts to impose restrictions which are not related to the protection of the identified features under the Birds Directive.</p>	
20	Scottish White Fish Producer's Association	Fishing activity	<p>While SWFPA is generally supportive of possible management advice options that may be applied at sites we note comments suggesting that "removal of target species may also decrease the availability of prey species, leading to decline in populations of other species".</p>	<p>Agreed, the wording in Box 1 of the SEA could be altered to "Removal of target species may also alter the availability of prey species, leading to changes in populations of other species (e.g. birds)".</p>

			SWFPA would reflect that the opposite is also true, in that "removal of target species is more likely to increase the availability of prey species, leading to increases in populations of other species (eg. protected bird species).	
21	Scottish White Fish Producer's Association	Fishing activity	Finally, mechanisms are in place to ensure that commercial stocks are exploited in a sustainable way and recent developments since 2011 (as highlighted in the SEA) demonstrate that this is proving effective. It would not be appropriate to add further layers of restrictions on the commercial species referred to in the SEA. Similarly, protection of key prey species is also managed under the CFP and any consideration of additional measures must be based on evidence.	Noted. The SWFPA will be consulted should any management measures for the pSPAs be proposed.

22	Mallaig & North-West Fishermen's Association	Fishing activity	<p>This response is submitted on behalf of Mallaig & North-West Fishermen's Association Limited (MNWFA). MNWFA was founded in 1947 to allow fishermen of Mallaig and the North West Coast to make contact with other fishermen and Fisheries Boards and to have a voice in the affairs of the industry. MNWFA represent a wide range of vessels operating across a range of sectors but the mainstay of their activities relate to Inshore fishing opportunities. Science support to MNWFA is currently provided by the Science Policy Officer of Scottish White Fish Producer's Association. MNWFA supports the principle of protecting seabird populations within the boundaries of the pSPAs. MNWFA would welcome the future opportunity to engage in the process of developing fisheries management measures, ensuring that any decisions taken are supported by strong and sound evidence and do not take account of opportunistic attempts to impose restrictions which are not related to the protection of the identified features under the Birds Directive. MNWFA notes the comment that "range and scale of management measures for fishing activities that</p>	<p>Any future management measures that might be developed at the sites will be subject to a separate SEA under the 2005 Act. MNWFA will be consulted as part of any process to develop fisheries management measures and will be given the opportunity to provide feedback on any proposed measures and their potential to cause displacement of fishing activities.</p>
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		<p>might be implemented are not currently known and therefore it is not possible to assess the significance of any environmental changes with any level of certainty". With this in mind, MNWFA would be opposed to fisheries management restrictions that may be applied for any reason other than the protection of the specifically identified feature (seabird) within the pSPAs (in order to meet the obligations of the Birds Directive). Furthermore, it is vital that potential displacement of fishing activity through management measures is fully evaluated when measures are being considered so as not to have detrimental environmental impact in other areas. MNWFA stress the need to take account of fisheries management measures that, already exist, and those that will be implemented within the Scottish MPA Network so that the impact on our members is minimized. While MNWFA is generally supportive of possible management advice options that may be applied at sites we note comments suggesting that "removal of target species may also decrease the availability of prey species, leading to decline in populations of other</p>	
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		<p>species". MNWFA would reflect that the opposite is also true, in that "removal of target species is more likely to increase the availability of prey species, leading to increases in populations of other species (eg. protected bird species). Finally, mechanisms are in place to ensure that commercial stocks are exploited in a sustainable way and recent developments since 2011 (as highlighted in the SEA) demonstrate that this is proving effective. It would not be appropriate to add further layers of restrictions on the commercial species referred to in the SEA. Similarly, protection of key prey species such as sandeel and sprat are also managed under the CFP and UK legislation and any consideration of additional measures must be based on evidence.</p>	
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23	Mallaig & North-Wes Fishermen's Association	Fishing activity	<p>While MNWFA is generally supportive of possible management advice options that may be applied at sites we note comments suggesting that "removal of target species may also decrease the availability of prey species, leading to decline in populations of other species". MNWFA would reflect that the opposite is also true, in that "removal of target species is more likely to increase the availability of prey species, leading to increases in populations of other species (eg. protected bird species).</p> <p>Finally, mechanisms are in place to ensure that commercial stocks are exploited in a sustainable way and recent developments since 2011 (as highlighted in the SEA) demonstrate that this is proving effective. It would not be appropriate to add further layers of restrictions on the commercial species referred to in the SEA.</p> <p>Similarly, protection of key prey</p>	<p>Agreed, the wording in Box 1 of the SEA could be altered to "Removal of target species may also alter the availability of prey species, leading to changes in populations of other species (e.g. birds)".</p>
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			<p>species such as sandeel and sprat are also managed under the CFP and UK legislation and any consideration of additional measures must be based on evidence.</p>	
24	Mallaig & North-Wes Fishermen's Association	Fishing activity	<p>Finally, mechanisms are in place to ensure that commercial stocks are exploited in a sustainable way and recent developments since 2011 (as highlighted in the SEA) demonstrate that this is proving effective. It would not be appropriate to add further layers of restrictions on the commercial species referred to in the SEA. Similarly, protection of key prey species such as sandeel and sprat are also managed under the CFP and UK legislation and any consideration of additional measures must be based on evidence.</p>	<p>Noted. MNWFA will be consulted should any management measures for the pSPAs be proposed.</p>

25	EDF Energy	Screening	<p>EDF Energy welcomes the opportunity to comment on Marine Scotland's Strategic Environmental Assessment (SEA) of Marine proposed Special Protection Areas (pSPAs). However, it is unclear why an SEA has been prepared for the pSPAs, as the programme does not appear to meet the qualifying descriptions in Section 5 of the Environmental Assessment (Scotland) Act 2005, or any of those listed in Schedule 1; furthermore, plans or programmes that have no effect or little effect on the environment are exempt. A screening assessment can determine whether a plan or programme is exempt if it is unlikely to have 'significant environmental affects'. It is unclear where the significant environmental effects from designating marine SPAs will arise, and we believe that Marine Scotland should explain why an SEA was required for these pSPAs.</p>	<p>A screening and scoping exercise on the classification of marine pSPAs was undertaken by Marine Scotland, in accordance with the requirements of the 2005 Act. A combined Screening and Scoping Report was published in March 2018. This included a review of the environmental effects that are likely to result from the designation of additional pSPAs in Scotland's marine environment in Table A1, Appendix A. The outcome of the screening exercise and the consultation responses from the Consultation Authorities confirmed the need for an SEA due to the likelihood for significant environmental effects to arise.</p>
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26	EDF Energy	Assessment outcome	<p>EDF Energy is concerned by the statement in paragraph 5.1.4 of the consultation document that “developers may look to avoid progressing consented developments that have not been built and locating regulated activities within pSPAs as they require further assessment and the consideration of appropriate mitigation measures”. This is a speculative assumption which is not based on evidence. A clear legal process already exists and this should be followed by developers:</p> <ul style="list-style-type: none"> Once a site becomes designated the consent of any development that was consented prior to the site being designated will be subject to a review in the form of an HRA under the Habitats Regulations. The HRA will be undertaken by the Competent Authority and will determine whether the project will have likely significant or adverse effects. Potential mitigation measures, including those mentioned in Paragraph 5.1.4, will depend on the conclusions of the HRA and they 	<p>Agreed, this assessment outcome is based on an assumption about the possible future decisions that developers will make in siting projects. This is based on an understanding of the existing decision-making processes involved in siting projects e.g. spatial constraints analysis, cost-benefit analysis. Should developers decide to progress a project that could have a likely significant effect on a site or its interest features, this will require an HRA under the Habitats Regulations and the obligations that fall under that legal process, which can be onerous and costly and therefore may look to be avoided.</p>
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			should not be considered within this SEA.	
27	EDF Energy	Management options	With reference to the points raised in paragraph 5.1.5 of the consultation, the assessment undertaken to provide management options (if required) at sites within an SPA where an activity is taking place is risk based. It is recognised within the 'Advice to Support Management' documents referenced in the consultation that future assessments should take into account the intensity and frequency of activities within the site and condition of the qualifying species. As these assessments have not yet been undertaken, risk management options are either still under development or have yet to be developed, meaning that it is not yet possible to determine	As noted in SEPA's response to the Screening and Scoping Report, although the potential requirement for future management measures will be subject to consideration under the Environmental Assessment (Scotland) Act 2005, it can be helpful for the current assessment to draw out the key issues which any future assessment(s) should consider. This is therefore what has been done in this SEA in order to provide some general direction to any future SEA.

		<p>whether or not they will be required at any particular site within a pSPA.</p> <p>Consequently, it is inappropriate to assume that the 'possible management advice options that may be applied at sites' presented in Table 2 will need to be implemented in practice, and inappropriate to base the conclusions of the SEA on this assumption. Potential impacts from current and future plans, programmes or projects on a pSPA will be addressed either in their own SEA or at the time applications are made.</p>	
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28	EDF Energy	Management options	<p>EDF Energy supports the comments made within the 'Advice to Support Management' document for the Outer Firth of Forth & St Andrews Bay Complex which describe the management options as providing "a starting point for discussing any management that might be required" adding that "management options for the site will be agreed with stakeholders following classification of the SPA". EDF Energy also supports the commitment in the same document for Marine Scotland and/or the relevant authority to consult with stakeholders before finalising its recommendations. "Before any firm recommendations are made, discussions should be held with stakeholders to ensure that there is a good understanding of the features and the likely interactions with activities". However, as a stakeholder in this particular pSPA, we are not aware of such discussion or consultation on management options having taken place, so assume that the recommendations in Table 2 of the SEA are not finalised and illustrative only, at least as far as this pSPA is concerned. We would appreciate</p>	<p>We can confirm that the management options are not finalised and are only included in this SEA to illustrate the range of management measures that might potentially be developed in the future following the classification of the pSPAs.</p>
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		confirmation from Marine Scotland that this is the case.	
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29	EDF Energy	Management options	<p>As a general principle, it is not appropriate to claim that there will be environmental benefits from a set of generic management options, such as the list in Table 2, when there has not yet been any discussion of the management options that are to be applied in practice within a pSPA. It is very important that documents such as this consultation clearly explain the status of any management options that are presented. This is to avoid any possible misunderstanding over what has been agreed - and what has yet to be agreed - within individual pSPAs for management options for particular activities. A general consultation cannot pre-empt the detailed development of management options through discussion with stakeholders.</p> <p>Equally, an assumption of environmental benefit made within an SEA, based on an assumption that management options will be applied, does not in any way require that such management options must be taken forward in practice. The management options that are ultimately required will</p>	<p>Noted. A high level review of the potential effects that might result from the implementation of management options has been included to draw out the key issues that any future SEA will need to consider should any management measures be proposed.</p>
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			depend on the detailed development of these.	
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30	Wildfowl and Wetlands Trust	Reasonable alternatives	<p>WWT welcome the creation of 15 Special Protection Areas (SPAs) and the list of qualifying species and note that this fills a number of gaps in the UK network that previously existed. In general we support the findings of the Strategic Environmental Assessment (SEA) of the positive environmental benefits of the 15 proposed SPAs. We have the following comments on the process:</p> <p>Alternative options</p> <p>We propose that the alternative options should have included an additional higher level option as some proposals from the 3rd SPA review (Stroud, D.A. et al. (2016) The status of UK SPAs in the 2000s: the Third Network Review, JNCC) are still missing from the proposed sites. As such an alternative option should have included all sites proposed in the 3rd SPA review. For example, there is no provision for Greater Black Backed Gull (non-breeding) despite a relatively small population size and clear concentrations in Caithness, Orkney and Shetland. The 3rd SPA review recommended that “appropriate SPA provision is needed [for Greater Black Backed Gull] in the inshore/terrestrial environment”. There are currently no SPAs in the UK for this species in the</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>
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			<p>non-breeding season. If this remains the case alternative measures must be implemented promptly (see comments under following question on network assessment).</p>	
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31	Wildfowl and Wetlands Trust	Management options	<p>Management measures</p> <p>Although the SEA mentions proposed management measures, it states:</p> <p>“the manner in which fishing activities within the sites are managed in the future to ensure that the conservation objectives for the qualifying features are achieved also has the potential to result in significant environmental changes. However, the range and scale of management measures for fishing activities that might be implemented are not currently known and therefore it is not possible to assess the significance of any environmental changes with any level of certainty.”</p> <p>We acknowledge that the SEA notes that specific management measures will be subject to separate SEA, however, we are disappointed that the current SEA did not make any recommendations regarding</p>	<p>This consultation is on the classification of pSPAs and not the manner in which they might be managed in the future to meet the site's conservation objectives. Possible management advice options that may be applied at sites in the future include reducing/avoiding/prohibiting certain fishing activities. The range and scale of any management measures that might be implemented are not currently known and therefore it is not possible to assess the significance of any environmental changes with any level of certainty. A high level review of the potential effects that might result from the implementation of management options has been included to draw out the key issues that any future SEA will need to consider should any management measures be proposed. Should any specific management measures be subsequently required to meet the objectives of the pSPAs, these will be subject to consideration under the Environmental Assessment (Scotland) Act 2005.</p>
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		<p>potentially damaging management or alternatively optimising beneficial management measures.</p> <p>The gain in benefits is dependent on the management of the sites. Halting activities, like the use of bottom-towed fishing gear and including protection of spawning and nursery grounds of prey species can have significant benefits in some areas. Such management measures should be identified and considered.</p> <p>Protected areas need to be well managed and monitored in order to enhance the site and protect the qualifying species. As such, advice covering management needs to take a more precautionary and ambitious approach than it currently does.</p>	
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32	Wildfowl and Wetlands Trust	Monitoring	<p>Monitoring</p> <p>We disagree with the SEA conclusion that no monitoring measures are proposed. There is a substantial need for better monitoring of SPA sites to ensure conservation objectives are met. There is also a need to monitor the success of the SPA network as a whole and to better identify cumulative impacts. We recommend a marine monitoring programme that adequately addresses the needs of site management and flyway-scale population monitoring.</p>	<p>No significant adverse effects have been identified by the SEA and therefore there are no mitigation measures proposed in that regard. It is acknowledged that monitoring of the SPA network is a requirement. SNH and JNCC, as statutory advisors to government, lead on the development of advice in relation to monitoring requirements. Further clarification is provided in the updated Environmental Report, Section 5.5.</p>
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33	Comhairle nan Eilean Siar	pSPAs	<p>The Outer Hebrides and surrounding area already makes a significant contribution towards Scotland's overall commitment to safeguarding the natural environment. We presently contribute through several environmental designations including international RAMSAR designations; European NATURA Habitats and Birds Directives; Special Protection Areas (SPA); Special Area of Conservation (SAC) and national designations such as SSSI's and National Scenic Areas. Indeed it makes a significantly greater contribution to environmental designation than any other part of Scotland and the Comhairle is strongly of the opinion that there is a direct correlation between the inappropriately high level of environmental designation and a lower level of economic performance.</p> <p>The Comhairle opposes any further environmental designations which may have a negative impact on economic opportunities or future development prospects. The proposed designations have the potential to</p>	<p>Noted. The scientific case for site selection for each pSPA is summarised in its respective Site Selection Document . In addition, details on the data, analysis methods, and general species ecology and behaviour that underpin the selection process are provided by the JNCC Reports series while JNCC generic documents provide non-technical supplementary advice .</p>
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			<p>impact on many current or future activities in the Outer Hebrides including aquaculture, commercial fisheries, energy generation, grid connectivity, oil and gas exploration and production and the emerging space exploration and satellite launching sectors. Environmental designations cannot be allowed to hinder these valuable development opportunities.</p> <p>The Comhairle registers its disappointment that despite representation and opposition from the community and the Comhairle against the continued imposition of environmental designations in the area local views are continually ignored.</p>	
34	Comhairle nan Eilean Siar	Social and economic effects	<p>In general the Strategic Environmental Assessment topics which have been scoped into the assessment are appropriate. The topic of Population and Human Health has been scoped out which may be relevant at an individual designation level but no regard is taken of the cumulative impact of several designations on</p>	<p>The purpose of the SEA is to assess the likely environmental effects that may arise from the classification of the pSPAs. Social and economic effects that may result from the classification of the pSPAs, including those on other users of the marine environment, have been previously assessed in a Socio-Economic Impact Assessment (SEIA) and Business and</p>

			Population impact. Several layers of designations and associated management measures will impact on population through limiting economic opportunities i.e. loss of jobs from traditional marine sectors.	Regulatory Impact Assessments (BRIAs) which are reported on separately to the SEA.
35	Comhairle nan Eilean Siar	Cultural heritage	Similarly the impact on Cultural Heritage at an individual designation level may be limited but any cumulative effect from several designations is ignored.	At the time of scoping, the Consultation Authority, Historic Environment Scotland, recognised that indirect benefits on the historic environment could result from the new designations but that these were not considered to be significant in nature and therefore agreed that this SEA topic should be scoped out of the assessment.
36	Comhairle nan Eilean Siar	Management options	Of the topics scoped in to the SEA, commercial fishing is identified as one pressure on marine biodiversity, flora and fauna. This is debatable and consequently any proposed management measures to address this should be appropriate, reasonable and proportionate with the risk associated with the feature i.e. seasonal gear restriction aimed specifically at discrete areas where the feature is most likely present; minimum depth of fishing operations; use of AIS and winch sensor technology to zone exactly where and when fishing activity is taking place.	This consultation is on the classification of pSPAs and not the manner in which they might be managed in the future to meet the site's conservation objectives. Possible management advice options that may be applied at sites in the future include reducing/avoiding/prohibiting certain fishing activities as described in Table 2. The range and scale of any management measures that might be implemented are not currently known and therefore it is not possible to assess the significance of any environmental changes with any level of certainty. A high level review of the potential effects that might result from the implementation of management options has been included to draw out the key issues that any future SEA will need to consider should any management measures be proposed. Should any specific management

				measures be subsequently required to meet the objectives of the pSPAs, these will be subject to further consideration under the Environmental Assessment (Scotland) Act 2005.
37	Comhairle nan Eilean Siar	Social and economic effects	With Population and Human Health and Cultural Heritage scoped out of the SEA the assessment notes that for West Coast Outer Hebrides and Seas off St Kilda 'the recommended management advice options remain the same therefore there is potential for beneficial impacts.' It can be argued that those management measures may also have a detrimental impact of Population and Cultural Heritage through loss of traditional sectors and associated employment impact although this is not assessed.	The purpose of the SEA is to assess the likely environmental effects that may arise from the classification of the pSPAs. Social and economic effects that may result from the classification of the pSPAs, including those on other users of the marine environment, have been previously assessed in a Socio-Economic Impact Assessment (SEIA) and Business and Regulatory Impact Assessments (BRIAs) which are reported on separately to the SEA.

38	Port of Inverness	Social and economic effects	<p>The Port of Inverness welcomes the opportunity to consult further on the proposal for 15 new Special Protected areas. With specific regard to the Strategic Environmental Assessment (SEA), the Port of Inverness broadly agrees with findings of the assessment, and has no substantive comment regarding the current contents of the report. However, we do object to the scope of the assessment since socio-economic impacts were scoped out of the SEA, on the basis that a Socio-Economic Impact Assessment (SEIA), and associated Business Regulatory Impact Assessments (BRIA) have previously been provided. As such, the only aspect of the pSPA Network, where negative impacts may have been identified, has been excluded from the SEA. This means that the SEA could only ever reach a positive conclusion, which we find rather defeats the purpose of conducting such an assessment.</p> <p>A SEA should provide a holistic overview of all potential impacts on the receptors detailed in Schedule 3 of</p>	<p>Noted. The purpose of the SEA is to assess the likely environmental effects that may arise from the classification of the pSPAs in accordance with the 2005 Act. Social and economic impacts have been assessed separately in the SEIA and BRIs.</p>
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		<p>the Environmental Assessment (Scotland) Act 2005. Specifically, potential impacts on 'Population' should be assessed, which include socio-economic aspects. Since there is the potential for impacts on Population resulting from the socio-economic implications of the pSPA network, it is inappropriate to scope this topic out of the assessment, regardless of the previous assessments conducted. Instead the SEA should refer out to the finds of the SEIA and associated BRIAs, summarising the potential impacts identified by these assessments. This would result in a single Strategic document, providing a comprehensive overview of the potential impacts of the pSPA network, thus allowing the consultees to make an informed decision on the pros and cons of the proposal, based on a single document. Currently, the assessment has been salami-sliced, resulting in a SEA which could only result in a positive conclusion, which means consultees are required to review multiple assessments, in order to ascertain a balanced appraisal of the overall impacts of the proposal.</p>	
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		<p>The point is exacerbated by the fact that serious concerns were raised by ourselves, and numerous other stakeholders, regarding the findings of the SEIA and associated BRIs due to the inaccurate assumptions made to underpin these assessments. These concerns have never been addressed, and as such the socio-economic impacts of the pSPA network have still not been adequately assessed, which we find to be a significant oversight.</p>	
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39	Orkney Islands Council	Reasonable alternatives	<p>THE SEA DOES NOT MEET STATUTORY REQUIREMENTS</p> <p>The Council is of the view that the SEA is not sufficiently robust to support designation due to a failure to comply with SEA statutory requirements on the following basis:-</p> <p>The Environmental Assessment (Scotland) Act 2005 (the Act) requires, at section 14, that the report must "identify, describe and evaluate the likely significant effects on the environment of implementing – (a) the plan or programme; and (b) reasonable alternatives to the plan or programme, taking into account the objectives and geographical scope of the plan or programme." Section 14 also states that "the report shall include such of the information specified in Schedule 3 as may reasonably be required". Schedule 3 goes on to state, at paragraph 8, that the SEA report shall include "An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken...". The Scottish Government's proposal/plan is to designate as SPAs the 15 areas described in the 2016 Marine Birds pSPA Consultation. An alternative to this proposal/plan was not suitably</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report. Based on the outcomes of the network assessment, altering the size or location of the pSPAs would not meet the UK SPA Selection Guidelines and the objectives for the protection of these birds. As stated in the SEA Environmental Report, the status quo or 'do nothing' scenario is also not considered a reasonable alternative given that there is a need to classify these sites to meet the obligations of the Birds Directive.</p>
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		<p>assessed in the 2016 Marine Birds pSPA Consultation. An alternative to this proposal/plan has not been identified, described or evaluated in the SEA. To meet the statutory requirement we would expect to see an assessment of alternative site locations which may offer equivalent protection. Without such an assessment it is not possible to know if there are any such sites.</p>	
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40	Orkney Islands Council	Reasonable alternatives	<p>Orkney Islands Council maintain their previous objection made in 2016 to the designation of the Scapa Flow and North Orkney proposed SPAs (the Orkney sites). It is the Council's view that the Scottish Government cannot reasonably proceed to designate the Orkney sites as SPAs and a decision to do so would fail to comply with both European and Scottish law, and with the JNCC SPA Selection Guidelines.</p> <p>Orkney Islands Council's comments on the Strategic Environmental Assessment (SEA) for the 15 proposed Special Protection Areas are not to be interpreted as being an indication that the Council's opposition to the designation of the Orkney sites has in any way relaxed or diminished. The Council makes the following comments notwithstanding this position, and indeed it is the Council's view that the SEA does not make the Scottish Government's case for designation of the Orkney sites any stronger due to deficiencies in complying with statutory requirements.</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report. Based on the outcomes of the network assessment, altering the size or location of the pSPAs would not meet the UK SPA Selection Guidelines and the objectives for the protection of these birds. As stated in the SEA Environmental Report, the status quo or 'do nothing' scenario is also not considered a reasonable alternative given that there is a need to classify these sites to meet the obligations of the Birds Directive.</p>
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		<p>Regarding the SEA the Council is of the view that the SEA is not sufficiently robust to comply with SEA statutory requirements. This is based on the following:-</p> <p>1. The SEA does not consider reasonable alternatives to the proposal. The Environmental Assessment (Scotland) Act 2005 (the Act) requires (at section 14) that the report must "identify, describe and evaluate the likely significant effects on the environment of implementing – (a) the plan or programme; and (b) reasonable alternatives to the plan or programme". The proposal/plan is to designate as SPAs the 15 areas described in the 2016 Consultation. An alternative to this proposal has not been identified, described or evaluated in the SEA. The three alternative scenarios stated in the SEA are not alternatives to the proposal/plan they are options within the proposal/plan. To meet the statutory requirement we would expect to see an assessment of alternative site locations which may</p>	
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		<p>offer equivalent protection. Without such as assessment it is not possible to know if there are any such sites.</p>	
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41		Future baseline	2. The likely evolution of the baseline environment has not been considered fully in the SEA. While trends and pressures on the SEA topics have been described there is no description of their likely evolution without implementation of the proposal/plan.	The review of trends and pressures for each of the scoped in SEA topics give an understanding of the factors that influence the distribution of features and therefore provide an indication of the likely evolution of the baseline environment in absence of the proposals. A detailed review of the future baseline is not possible given the complex nature of the marine environment and difficulties in predicting how it might evolve with climate change and other human pressures. The assessment is considered to be proportionate. This has now been more clearly sign-posted in the updated Environmental Report to help address this comment.
42	Orkney Islands Council	Cumulative effects	3. Consideration of secondary effects is required by the Act. Renewable energy projects or aquaculture developments are referred to as potentially being displaced to other areas which puts such projects at risk given their locational specifications. This should have been considered properly.	future renewable energy projects or aquaculture sites may not necessarily be displaced as a result of the classification of the pSPAs. The assessment requirements of regulated activities would increase under the Habitats Regulations where they have a potential to result in a likely significant effect on the SPA or associated interest features but this would not necessarily preclude development from taking place within the SPAs and therefore these activities may not necessarily be displaced. Developers may choose to avoid these sites to avoid having to undertake additional assessment and mitigation and the potential environmental effects of any displacement of activities has been identified in the SEA. However, this has not been assessed in any more detail as it is not possible to predict at this

				stage the scale/magnitude of any displacement of future activities.
43	Orkney Islands Council	SEA topic	4. There is confusion over the assessment of effects on 'Soil' and 'Geodiversity'. The SEA refers to 'soil' as a 'SEA topic' but then under 'Environmental Baseline' 'geodiversity' is described. Then, in the assessment of effects, 'soil' is assessment with no mention of 'geodiversity'.	The SEA topic that has been scoped in under the overarching heading Biodiversity, Flora and Fauna is Soil and this is specifically in relation to geodiversity (which could be considered a sub-topic). Hence the baseline section included a review of the Geodiversity but the assessment referred to the SEA topic.
44	Orkney Islands Council	Cross-border impacts	5. There is no need to consider cross-border components for the Solway Firth pSPA as the UK is the member state. We have set out our full response in a letter dated 9th November 2018 which is being sent direct to MS and is to be considered to be part of Orkney Islands Council's consultation response.	It is understood that both Scotland and England form part of the UK and therefore are the same Member State. The SEA has simply clarified that consideration has been given to impacts within and outside of Scottish territorial waters where relevant (i.e. offshore waters and English waters).

45	Orkney Islands Council	Reasonable alternatives	<p>The SEA states that “three alternative scenarios (high, medium and low), which vary the inclusion of species as qualifying features at each pSPA, have been assessed”. These scenarios do not satisfy the requirements of the Act for the following reasons:-</p> <p>the three alternative scenarios have been considered as reasonable alternatives for the network of Marine pSPAs however no description of the three scenarios appears to be provided;</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>
46	Orkney Islands Council	Reasonable alternatives	<p>the scenarios which are assessed are variations on a single programme and are not alternatives to the proposal/plan and the SEA is not the forum to consider such variations; and there is no assessment of the proposal/plan against a reasonable alternative.</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>

47	Orkney Islands Council	Reasonable alternatives	<p>The OIC response to the SEA Screening and Scoping Report prepared by Aquatera in 2015 at section 3.5 provides specific feedback on how the reasonable alternatives should be assessed including:-</p> <ul style="list-style-type: none"> (a) No designation (b) Designation of smaller, targeted areas of highest importance (c) Designation of separate areas for wintering and breeding season interests (d) The cumulative effects of designating two extensive dSPAs in Orkney waters. Are both required to achieve an ecologically coherent network? (e) Justifications for the extent of each of the dSPA boundaries (f) When assessing reasonable alternatives, it is valuable to consider the extent of existing protection afforded to breeding seabird species from the existing suite of SPAs <p>The Council provided a detailed appraisal of how an assessment of reasonable alternatives should be carried out for the SEA which appear to have been ignored.</p>	<p>A new set of reasonable alternatives have been developed by Marine Scotland in response to comments received on the Environmental Report that was published for consultation in 2018. These reasonable alternatives are set out and assessed in the updated Environmental Report.</p>
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48	Orkney Islands Council	Future baseline	<p>The likely evolution of the baseline environment has not been considered fully. While trends and pressures on the SEA topics have been described there is no description of their likely evolution without implementation of the proposal/plan as is required by Schedule 3 of the Act.</p>	<p>The review of trends and pressures for each of the scoped in SEA topics give an understanding of the factors that influence the distribution of features and therefore provide an indication of the likely evolution of the baseline environment in absence of the proposals. A detailed review of the future baseline is not possible given the complex nature of the marine environment and difficulties in predicting how it might evolve with climate change and other human pressures. The assessment is considered to be proportionate. This has now been more clearly sign-posted in the updated Environmental Report to help address this comment.</p>
49	Orkney Islands Council	Cumulative effects	<p>The section of the SEA on Cumulative effects highlights potential for activities such as renewable energy or aquaculture developments, currently occurring in the pSPAs, to be displaced to other areas. The development of renewable energy technology has very specific locational requirements and, if suitable alternative locations were to prove unavailable, it is possible that certain developments would not go ahead. This issue should have been explored further as a secondary effect, in line with Schedule 3 of the Act.</p>	<p>future renewable energy projects or aquaculture sites may not necessarily be displaced as a result of the classification of the pSPAs. The assessment requirements of regulated activities would increase under the Habitats Regulations where they have a potential to result in a likely significant effect on the SPA or associated interest features but this would not necessarily preclude development from taking place within the SPAs and therefore these activities may not necessarily be displaced. Developers may choose to avoid these sites to avoid having to undertake additional assessment and mitigation and the potential environmental effects of any displacement of activities has been identified in the SEA. However, this has not been assessed in any more detail as it is not possible to predict at this</p>

				stage the scale/magnitude of any displacement of future activities.
50	Orkney Islands Council	SEA topic	<p>SEA TOPICS</p> <p>There is confusion over how effects on benthic sediments are assessed. Paragraph 3.2.2 states that an initial review of the environmental topics suggests that potentially significant environmental effects would be focused on: Biodiversity, Flora and Fauna; Soil; Water and Climatic factors. The screening and scoping report had proposed that these topics should all be considered under the topic Biodiversity, Flora and Fauna. At this stage Geodiversity is not mentioned. The Environmental Baseline then describes the seabed in terms of its Geodiversity, although no SEA objective is identified for Geodiversity. Finally, section 5 'Results of SEA' describes the effects on Soil, but fails to mention Geodiversity.</p>	The SEA topic that has been scoped in under the overarching heading Biodiversity, Flora and Fauna is Soil and this is specifically in relation to geodiversity (which could be considered a sub-topic). Hence the baseline section included a review of the Geodiversity but the assessment referred to the SEA topic.

51	Orkney Islands Council	Cross-border impacts	Paragraph 3.3.6 highlights cross-border components with England in the Solway Firth pSPA. However, as Scotland and England constitute parts of the UK and the UK is the member state of Europe, there should be no need to consider this as a cross border issue.	It is understood that both Scotland and England form part of the UK and therefore are the same Member State. The pSPAs are therefore not anticipated to have transboundary implications (i.e environmental effects on other EU Member States). However, there is potential for impacts to arise outside of Scottish territorial waters (i.e. cross-border impacts). As there is the potential for cross-border impacts to arise, the SEA has been undertaken in accordance with both the requirements of the 2005 Act and the Environmental Assessment of Plans and Programmes Regulations 2004 (the '2004 Regulations').
52	Orkney Islands Council	pSPAs	OTHER COMMENTS ON THE SEA Table 7 appears to consider Pentland Firth and Scapa Flow as one site although this is no longer the case and the Pentland Firth pSPA has been removed from the Consultation.	We can confirm that Pentland Firth pSPA was included in the consultation as a separate site to Scapa Flow pSPA. In the new consultation on an updated Environmental Report the Pentland Firth pSPA is not included as the update is based upon SNH's Final Advice which recommends excluding this possible site from the network.
53	Orkney Islands Council	Error/omission	Paragraph 4.2.14 mistakenly identifies seals as European Protected Species.	Agreed, seals are not European Protected Species. Grey seal and common seal are listed on Annex II of the Habitats Directive for which SACs may be designated.
54	Orkney Islands Council	Error/omission	Box 1 lists pressures on marine biodiversity, flora and fauna and highlights potential impacts on wild salmon through transmission of sea lice. Wild sea trout are also vulnerable to transmission of sea lice, so it would	Agreed.

			have been more accurate to refer to wild salmonids.	
55	Orkney Islands Council	Error/omission	Paragraph 4.5.3 identifies horse mussel, flame shell and blue mussel as Priority Marine Features (PMFs). It should be noted that the PMFs are in fact horse mussel beds; flame shell beds and blue mussel beds.	Noted, however, this paragraph is referring to habitats that can be termed 'blue carbon sinks' not PMFs.