

## **Scottish Seabird Conservation: Action Plan Consultation**

Our Response – March 2025

### **1. Do you support the implementation of the Scottish Seabird Conservation Action Plan?**

**Yes**

The Scottish Seabird Centre (SSC) welcomes the publication of the Action Plan and the ambition and vision that the Plan shows. Delivery is urgent given the context of serious declines in recent decades and growing pressures, particularly as a result of avian flu and the growing offshore renewables sector. We are concerned, however that successful implementation requires urgent progress on the following:

1. SMART targets - The priority actions in the Plan are often vague and lack a timescale. This makes implementation difficult to monitor and undermines our ability to have confidence in the plan and the Scottish Government's ability to deliver on the vision and objectives. SMART targets would drive implementation, build confidence and clarify direction.
2. Clear governance and responsibilities – Successful delivery will depend on cross-government collaboration and clearly embedding the aims and actions set out in the plan across the relevant parts of government. We would like to see a clear governance structure for the plan, including a designated lead next to each action (e.g. Marine Directorate, NatureScot, etc).
3. Funding – Delivery of the plan would require significant investment in Scottish Government capacity and in nature conservation delivery. A clear short and long-term funding and investment plan is required to show how this will be delivered.
4. Managing conflict – restoring and protecting Scotland's seabird populations will have many co-benefits for communities and fisheries, helping deliver broader Scottish Government environmental and social goals. However, delivery of some measures will require buy-in and compromise from other sectors, particularly the energy and fishery sectors. The Scottish Government needs to develop a clear plan to maximise the co-benefits and identify and manage any conflicts.

### **2. Do you agree that the key pressures to seabirds in Scotland are identified?**

**Yes**

The key pressures to seabirds in Scotland are identified in the Plan, however the potential impact of offshore wind is not given the weight and recognition it merits. For example, the proposed Berwick Bank offshore wind farm in combination with other North Sea windfarms is expected to lead to a reduction in the puffin population in the Forth Islands SPA of 7.4-12%. This is against a backdrop of a population already in decline and forecast to continue to decline in range and abundance within Scotland as a result of climate change. The Action Plan should seek to directly and fairly set out the risks posed by marine renewables to seabird populations and the comprehensive response that is required to mitigate them, including both addressing existing proposals and planning for future consent rounds.

### **3. Have we captured the key actions needed to deliver the vision, aims and objectives?**

**No**

#### *Ensuring Plentiful food supplies*

The SSC warmly welcomed the closure of fishing for sandeel in Scottish waters. This was an unsustainable fishery and its closure will have a direct and positive impact on those seabird populations that rely on sandeel. The four further actions proposed in this section are all welcome, however further specificity is required in terms of what will be delivered, where and by when.

Robust and fit for purpose management measures are urgently required for all MPAs. From a seabird conservation perspective, this should include implementation of management measures for all dredging and trawling activity in MPAs rather than specifically hydraulic dredging.

Restoring and enhancing fish spawning and juvenile congregation areas is essential. However, “exploring opportunities” to do this is inadequate. We would propose that the Scottish Government commits to putting in place adequate protection and management measures for these areas as soon as possible.

The recognition of the link between restoration of benthic habitats and building thriving and resilient seabird populations is welcome, however a more specific and proactive commitment from the Scottish Government is required than simply exploring opportunities. There is already considerable activity led by the third sector around Scotland that is identifying opportunities for restoration and delivering restoration, including Restoration Forth, which the SSC is a delivery partner for. The Scottish Government should focus on accelerating the growth of this activity and catalysing the development of further proposals by ensuring funding for restoration project development and delivery is readily available, and that the Marine Directorate and NatureScot are actively facilitating projects.

Rather than committing to “contributing to international discussions on effective accounting for forage fish seabird consumption when setting total allowable catches to ensure sustainable fisheries.”, we would suggest that the action plan includes a clear commitment to playing a leadership role within international discussions.

#### *Restoring and improving seabird habitats*

We welcome the progress that has been made in recent years to develop biosecurity plans and put in place biosecurity measures, and to eradicate non-native species on some islands. The SSC is responsible for managing and monitoring three major seabird islands in the Forth, and we look forward to continuing to collaborate with the Scottish Government, the Biosecurity for LIFE project, and others to maintain effective invasive species management, biosecurity monitoring and incursion response protocols in this area.

We welcome the actions proposed to restore and improve seabird habitats, however a strengthened commitment on eradicating non-native mammalian predators is needed. We believe that the Scottish Government should be driving forward plans to eradicate non-native mammalian predators from all seabird islands for which this is practicable by facilitating the

development of projects and the flow of public and private finance to them, and setting a target date by when this will be achieved.

### *Maximising resilience and survival*

[Scottish Government](#) and [JNCC](#) research has highlighted the high rates of bycatch in longline fisheries for northern fulmar in particular, and concerns remain over bycatch associated with the use of gillnets. While we welcome the actions proposed, we believe that the precautionary principle should apply and more urgent and specific action be taken. As a minimum, this should include a prohibition on the use of gillnets within protected areas and making remote electronic monitoring mandatory for any vessel equipped with gear known to be associated with high bycatch risk, including gillnets and longline.

Discarded and lost fishing gear is also a cause of seabird mortality and the Seabird Action Plan should therefore include actions to progress commitments on addressing this issue. While we welcome the Scottish Government's support for global ghost gear initiative, further progress is required to support and encourage better fishing gear management to minimise loss and discarding. This should include incentives and action to make it easier for fishers to responsibly dispose of gear at the end of their life.

We are concerned that the potential impact of offshore wind on seabirds has not been given due weight in the action plan. While we welcome a commitment to strategic site selection to minimise impacts on seabirds, this will only affect future developments. There are already 6GW operations, under construction or consented and a further 39GW of sites being progressed that would be unaffected by this commitment. The cumulative impact of these developments is potentially catastrophic for a broad suite of seabird species. The Scottish Government should (i) ensure that the most damaging existing proposals are not consented; (ii) require that all individual projects are nature positive, investing in enhancement in addition to any compensation that may be required; and (iii) ensure an ambitious and effective strategic compensation framework is developed that channels significant funding into seabird conservation and restoration projects.

In addition to ensuring data from post-consent monitoring of renewables is available in the public domain, we believe that the Scottish government should be playing a role in supporting innovation in technical and management measures to mitigate disturbance, displacement and mortality, and ensuring best practice evolves as our understanding grows.

We welcome the commitment to ensure the seabird site protection network captures the most important areas for seabirds, and suggest that an initial review of the network from a seabird perspective is completed by the end of 2026 to allow consideration of any recommendations early on in the next parliamentary session.

Greater urgency and priority needs to be given to reducing sources of litter that impact the coastal and marine environment. While we welcomed the Scottish Marine Litter Strategy, we are concerned that progress that has had a demonstrable impact on marine litter simply has not been made.

### *Building the Evidence*

We welcome the priority actions proposed, and look forward to engaging with many of them. It would be helpful for the Action Plan to also recognise the invaluable contribution that volunteers and citizen science make to seabird monitoring and research. Examples include

the British Trust for Ornithology's Seabird Monitoring Programme, SeabirdWatch (via the online citizen science platform Zooniverse) and local groups like the Forth Seabird Group (who have been monitoring seabirds in the Firth of Forth since 1959). We work in partnership with the Forth Seabird Group and our own volunteers to carry out puffin burrow counts on the islands of Craigleith, The Lamb, and Fidra. These essential surveys and the vital data that they provide would not be possible without the expertise and dedication of volunteers. Additional funding for citizen science and other volunteer and engagement programmes is needed to ensure their continued success and ability to contribute to scientific understanding.

#### *Seabird species covered by the Action Plan*

Along with other LINK members, we believe that the scope of the Action Plan should be expanded to include Common Gull and Black-headed Gull. Both species have suffered significant declines in Scotland, with the latest Seabirds Count census showing population decreases of 53% and 75% respectively since 2000. Urgent action is needed to reverse these declines and safeguard these species in Scotland.

#### *Celebrating Scotland's Seabirds*

We welcome the recognition in the Action Plan of the importance of celebrating our seabirds. Scotland is fortunate to host these internationally important wildlife populations, and we are keen to work with others to build understanding and inspire people to value them and be proud of our natural heritage. The proposed actions are very positive, and we look forward to supporting their delivery.

#### *Making a global contribution*

It is important that the Action Plan recognises that as Scotland supports globally important seabird colonies and it has a global responsibility to their stewardship. Unless this responsibility is met, we do not have credibility on biodiversity issues at an international level, and we certainly cannot make claim to leadership. Reversing the declines of seabirds and putting in place good stewardship of the colonies, as this action plan seeks to do, is arguably the single biggest contribution that Scotland can make to tackling the global nature crisis and preventing extinctions. In addition, we would welcome additional language in this section that commits the Scottish Government to playing a leadership role on seabird conservation in all relevant international, including fisheries, marine, climate and nature fora.

#### **4. Do you have any views on what measures we should use to monitor progress and success?**

##### **Yes**

We and other Link members believe that the Scottish Government should publish an annual review of the Action Plan that monitors progress in the delivery of actions and towards the overall vision and aims.

In terms of monitoring success, we would like to see the actions proposed in the Plan developed into SMART commitments. This is essential for us to both have confidence in delivery and to monitor progress. We also believe that seabird relation targets and outcomes should be integrated into broader Scottish government initiatives, including the delivery of

the Scottish Biodiversity Plan, the Biodiversity Investment Plan, and the development of statutory targets following the passage of the proposed Natural Environment Bill.