



Scottish Natural Heritage Dualchas Nàdair na h-Alba

All of nature for all of Scotland
Nàdar air fad airson Alba air fad

Mr Ben Dipper
Marine Scotland
Sea Fisheries
Victoria Quay
Edinburgh
EH6 6QQ

Date: 21st June 2018

Our ref: NAT/MAR/MFSH/BP/MF-CA-18/19

Dear Mr Dipper,

CLYDE HERRING DELEGATED TAC 2018 CONSULTATION

Thank you for your consultation regarding the 2018 TAC and Quota Regulation (TQR) (Council Regulation 2018/120) to determine the Total Allowable Catch (TAC) for Clyde herring in 2018.

The consultation proposes that the 2018 TAC should be set at 583 tonnes (rollover) on the clear understanding that if this year's survey shows no improvement in the condition of the stock a precautionary reduction will need to be considered in the 2019 consultation.

Summary

In our view, it is unlikely that the proposal will have a significant effect on any qualifying natural heritage interests either directly or indirectly. An appropriate assessment is therefore not required. We would, however, support a reduction in TAC next year if evidence shows no improvement in the condition of the stock.

Advice

This proposal raises natural heritage issues of international and national importance and we offer the following advice:

Ailsa Craig Special Protection Area (SPA): qualifying interests – Gannet, Guillemot, Herring gull, Kittiwake, Lesser black-backed gull, Seabird assemblage.

This SPA sits within the consultation area, and has connectivity with the proposed herring TAC as diving birds such as gannet and guillemot feed on herring. However, the proposed TAC is a relatively small quantity, and guillemot and gannet have a large foraging range beyond the footprint of the Clyde. Gannets feed on a wide range of species include mackerel and sprats decreasing their dependence on finding herring. Gannets and guillemots at Ailsa

Scottish Natural Heritage, Battleby, Redgorton, Perth, PH1 3EW.
Tel: 01738 444177, Fax: 01738458611 www.nature.scot

Dualchas Nàdair na h-Alba, Battleby, Ràth a' Ghoirtein, Peairt, PH1 3EW ,
Fòn: 01738 444177 Facs: 01738 458611 www.nature.scot

Craig SAC have been assessed as being in favourable maintained condition suggesting that having the same TAC in previous years is not affecting bird counts in the area. We therefore consider there will be no likely significant effect (LSE) on the SPA.

Nature Conservation Marine Protected Areas (NCMPA)

Clyde Sea Sill NC MPA: features

- Black guillemot
- Marine geomorphology of the Scottish Shelf Seabed
- Circalittoral and offshore sand and coarse sediment communities
- Fronts

South Arran NC MPA: features

- Burrowed mud
- Kelp and seaweed communities on sublittoral sediment
- Maerl beds
- Maerl or coarse shell gravel with burrowing sea cucumbers
- Seagrass beds
- Shallow tide-swept coarse sands with burrowing bivalves
- Ocean quahog aggregations

Upper Loch Fyne and Loch Goil NC MPA : features

- Burrowed mud
- Flame shell beds
- Horse mussel beds
- Sublittoral mud and specific mixed sediment
- Ocean quahog aggregation

These NC MPAs are within the Clyde herring TAC consultation area and therefore consideration should be given to the natural heritage impacts on the features listed. There are no predator prey relationships with black guillemot and herring, that tend to feed on benthic species like butterfish and scorpion fish associated with kelp beds or rocky seabeds. There are no interactions with the benthic features of these NC MPAs as herring are a pelagic species and fishing activities take place in the water column rather than touching the seabed. This site may, however have a positive connection with herring by providing a spawning and/or nursery habitat as they are known to lay eggs on sand and gravel and use complex habitats as nursery grounds. We therefore conclude that there are likely to be no potential impact pathways for these NC MPA features.

In relation to national interests

We have considered the consultation and potential impacts against the qualifying feature of the Ailsa Craig and Sanda Islands Site of Special Scientific Interest (SSSI). Consideration of

interactions upon the bird species and their supporting habitats may be considered to be addressed in the advice given for Ailsa Craig SPA. We therefore advise there will not be any adverse impacts on the Ailsa Craig and Sanda Islands SSSI.

We hope these comments are helpful. If further information or advice is required please contact me in the first instance kirstie.dearing@snh.gov.uk.

Yours faithfully

Dr Kirstie Dearing
Policy and Advice Officer – Fisheries and Energy