

SCOTTISH TOURISM ALLIANCE RESPONSE:

SCOTTISH GOVERNMENT CONSULTATION ON SCOTTISH HIGHLY PROTECTED MARINE AREAS

The Scottish Tourism Alliance (STA) is the overarching trade body for the tourism and hospitality industry in Scotland. It comprises of over 250 trade associations, businesses, destination groups and other organisations with an interest in tourism. Its membership is spread across all regions and destinations.

The organisation is governed by a Board with wide-ranging representation from Scotland's tourism industry and supply sectors, who together with STA's Council and Destination Forum shape the organisation's policy agenda for the Scottish Government, UK Government and other key stakeholders.

The STA led and co-ordinated the development and launch of Scotland's national tourism strategy, [Scotland Outlook 2030](#), in collaboration with the Scottish Government and its agencies. The trade body remains driven by this strategy, growing the value and positively enhancing the benefits of tourism in Scotland by delivering the very best for visitors, businesses, people, communities and environment.

INTRODUCTION

The Scottish Tourism Alliance (STA) is grateful for the opportunity to provide a collective response to the Scottish Government's consultation on Scottish Highly Protected Marine Areas (HPMAs) on behalf of the tourism industry.

We have limited our response to Question 7: **'Do you have any further comment on the draft Policy Framework, which have not been covered by your answers to the previous questions?'**

The tourism industry values the importance of protecting our marine environments, their biodiversity, and the coastal environment that underpins the value of the recreational activities that attract responsible tourists to our coastlines. Protecting and safeguarding our marine areas helps to ensure one of our greatest natural tourism assets continues to be enjoyed by future generations, alongside guaranteeing that we can continue to offer world-renowned Scottish seafood. At the same time, coastal and marine environments should continue to offer non-damaging opportunities for recreational activities for locals and visitors to enjoy.

Care of the environment and the responsible, sustainable enjoyment of our waters is a core theme within the Giant Strides 2020-2025 Marine Tourism Strategy, and is one of the 5 pillars of the British Marine National Agenda, which we wholeheartedly support.

We welcome the conclusion that recreational water activities at non-damaging levels should be permitted in HPMAs. However, our response also sets out the challenges associated with HPMAs, which may indirectly impact coastal and island communities. It is imperative these are overcome through the introduction of an evidence-based, robust and proportionate policy framework which will benefit the marine environment while also minimising potential adverse impacts. We cannot stress enough the importance of close consultation with tourism destinations in island and coastal areas.

KEY TOURISM STATISTICS AND POLICY CONTEXT

The following statistics provide valuable background to the discussion:

- The tourism sector contributes around £6 billion of GDP to Scotland's economy, employing 207,000 people, accounting for one in every 12 jobs ¹. In 2016 spending by tourists in Scotland generated around £11 billion of economic activity in the wider Scottish supply chain.²
- The tourism sector is an important part of the Scottish economy, supporting business activity and employment opportunities across the whole of Scotland. In 2017, 96% of tourism enterprises were small businesses (0-49 employees), accounting for 51% of employment in the sector. ³
- In 2019, UK residents made 14.1 million overnight stays in Scotland, accounting for 80% of all stays in that year.⁴
- International visitors made almost 3.5 million visits to Scotland in 2019, staying for approximately 27.4 million nights and spending around £2.538 million – 43% of the total overnight spend in Scotland.⁵

BENEFITS OF MARINE TOURISM TO SCOTLAND

Marine tourism provides numerous benefits, including:

1. **Economic benefits:** Marine tourism contributes to local economies through revenue generated from visitor spend, job creation, and business development. It can stimulate economic growth in coastal communities, supporting local businesses such as accommodation providers, restaurants, kayak/paddle board hire, boat charters, and other marine-related services.
2. **Conservation and environmental benefits:** Marine tourism can contribute to conservation efforts by raising awareness about marine ecosystems, wildlife, and conservation issues. Through educational programmes and interpretive activities, marine tourism can help foster a sense of stewardship among visitors, encouraging them to become advocates for marine conservation and support conservation initiatives.
3. **Socio-cultural benefits:** Marine tourism can provide opportunities for cultural exchange, promote understanding and appreciation of marine-based cultures, and provide economic opportunities for local communities. It can also help to preserve traditional practices and knowledge related to marine resources, enhancing cultural heritage and promoting cultural sustainability. Marine tourism in coastal areas is very often a key driver for young people to be able to continue to live and work in rural communities.
4. **Recreational and health benefits:** Marine tourism offers recreational opportunities such as diving, boating, kayaking, and other water-based activities, which can promote physical activity, relaxation, and mental well-being. Spending time in natural marine environments has been shown to have positive effects on mental health and well-being, including reducing stress and promoting relaxation.

¹ <https://scottishtourismalliance.co.uk/wp-content/uploads/2019/06/Tourism-Economic-Narrative.pdf>

² <https://www.gov.scot/publications/tourism-scotland-economic-contribution-sector/pages/5/>

³ <https://scottishtourismalliance.co.uk/wp-content/uploads/2019/06/Tourism-Economic-Narrative.pdf>

⁴ <https://www.visitscotland.org/research-insights/about-our-industry/statistics>

⁵ <https://www.visitscotland.org/research-insights/about-our-visitors/international/annual-performance-report>

5. **Scientific and educational benefits:** Marine tourism can support scientific research and monitoring efforts, providing opportunities for data collection, observation, and engagement with researchers. It can also facilitate environmental education and interpretation, fostering a better understanding of marine ecosystems, species, and conservation challenges.
6. **Community engagement and empowerment:** Marine tourism can involve local communities in decision-making processes, allowing them to have a voice in tourism planning, development, and management. This can empower local communities, foster community engagement, and create a sense of ownership and pride in marine resources.

At the same time, it is important to note that marine tourism should be managed sustainably to minimise potential negative impacts on marine environments, wildlife, and local communities.

Responsible tourism practices, such as adhering to regulations, minimising waste and pollution, respecting and protecting marine wildlife, and supporting local conservation efforts, are crucial to ensure that marine tourism delivers long-term benefits while minimising its environmental and socio-cultural impacts.

SCOTLAND OUTLOOK 2030

Scotland's national tourism strategy, '**Scotland Outlook 2030: Responsible Tourism for a Sustainable Future**⁶', was launched in March 2020 with a bold new vision to be 'the world leader in 21st century tourism'. The strategy was developed through an equal partnership between the STA, Scottish Government, VisitScotland, Scottish Enterprise, Highlands and Islands Enterprise and Skills Development Scotland.

It has been guided by the Strategy Steering Group with representatives from industry, public bodies and the partner organisations. Scotland Outlook 2030 has been informed by a robust evidence base gathered from all partners, with over 2,500 tourism leaders and stakeholders from Scotland's tourism industry contributing to its development. This included a breadth of organisations from local authorities and Destination Management Organisations to business owners, operators and social enterprises. Our commitment is to work as one – our government, industry, private and public sector and our communities – to deliver our 21st century vision through a set of measurable commitments.

The strategy, launched on 4th March 2020, is reflective of the changing world we live in, our new mindset and approach to how we live and work and represents the beginning of a bold new approach putting our communities, our people, our visitors, our businesses and our environment at the heart of everything we do. The underpinning mission is that **'Together we will grow the value and positively enhance the benefits of tourism across Scotland by delivering the very best for our visitors, our businesses, our people, our communities and our environment'**. The four principal priorities are our passionate people, our thriving places, our diverse businesses, and our memorable experiences'.

The underpinning strapline of the strategy is **'Responsible Tourism for a Sustainable Future'**, and the tourism industry remains committed to ensuring that all future planning is seen through a socio, environmental and economic sustainable lens.

⁶ <https://scottishtourismalliance.co.uk/wp-content/uploads/2020/03/Scotland-Outlook-2030.pdf>

Outlook 2030 identifies that future success will only be achieved through partnership, strong leadership and acknowledgement of the six conditions identified as being vital for success, which includes having the right policy and regulatory landscape in place.

GIANT STRIDES

Scotland's Second Marine Tourism Strategy, 'Giant Strides 2020-2025'⁷, supports communities, the environment and economic growth around Scotland's coasts, lochs and waterways, and also represents the next evolution of the successful 'Awakening the Giant' strategy.

Giant Strides takes a much broader view of marine tourism, its role within coastal and island communities and the significant benefits marine tourism can deliver for communities, the environment and the economy of Scotland. It is intended to be a strategy of influence and takes a partnership approach to strategic development. The five-year plan aims to boost Scotland's reputation as a world-class sustainable marine tourism destination by meeting changing consumer, workforce, community and environmental needs and grow the industry's economic contribution to over £500 million by 2025.

The development of Giant Strides sought to ensure alignment with key strategies that influence our sector. Of particular note are the deliberate and close alignment to the **National Tourism Strategy Scotland Outlook 2030** and to **The Environment Strategy for Scotland**.⁸ Tourism does not stop at our borders and also noting our biggest market is UK domestic, its sought to align with and complement UK activity and in particular **British Marine's National Agenda**.⁹

The Giant Strides strategy deliberately seeks to draw sport, recreation and tourism together to identify wider synergies and increase the benefit for individuals, communities, businesses and government from engaging resident populations and visiting tourists in activities that are both sports and contributors to marine tourism.

In doing so, it demonstrates how marine tourism creates enhanced opportunities for more people to be more active and stay active, contributing more demonstrably to the health and wellbeing, connectedness, physical confidence and competence of local communities, as well as being a direct driver for education, employability and lifelong learning in remote and coastal communities. Sport and recreation also play a significant part in creating long term demand for marine tourism services and feeder communities for other marine tourism activities.

The vision is for Scotland to be a world leader in 21st century sustainable marine tourism. The Mission is to ensure Scottish marine tourism is sustainable and meets changing consumer, workforce, community and environmental needs and expectations, whilst growing the industry's overall economic contribution to over £500 million by 2025.

This will be achieved by focusing on four strategic themes:

1. **Our waters: clean and blue** – To be stewards of the natural environment we access; investing in natural capital, supporting wildlife and addressing our waste and emissions.

⁷ https://scottishtourismalliance.co.uk/wp-content/uploads/2020/08/FINAL-Strategy-Document_Giant-Strides-2020-2025.pdf

⁸ <https://www.gov.scot/publications/environment-strategy-scotland-vision-outcomes/>

⁹ <https://britishmarine.co.uk/Services/Representation-and-Promotion/Our-National-Agenda>

2. **Our experiences: authentic and seamless** – To provide authentic seamless experiences that create special lasting memories.
3. **Our people and our communities: valued and healthy** – To establish marine tourism as a career of first choice, as a force for good across the communities we are part of and to inspire more people to engage in our activities.
4. **Our businesses: profitable and sustainable** – To support our businesses to be more sustainable, more profitable and more ambitious.

STA POSITION ON HPMAs

The STA and its members generally support the Bute House Agreement aim that HPMAs “provide protection from all extractive, destructive and depositional activities, including all fisheries, aquaculture and other infrastructure developments, while allowing other activities, such as tourism or recreational water activities, at non-damaging levels.” Furthermore, we support the commitment to ensure that “our marine ecosystems continue to provide economic, social and wider benefits for people, industry and society.”

However, we must note that some of our Destination Forum Members in island and coastal areas emphasise that this support does not mean an endorsement of a complete ban on all of these kinds of activities, as they provide important benefits to marine tourism and their local areas (see previous section on BENEFITS OF MARINE TOURISM TO SCOTLAND).

As part of the next consultation stage, we strongly recommend that the Scottish Government engages with the wider tourism community and destination groups in island and coastal areas, particularly concerning the decision-making process around identification of specific HPMA locations. The STA is happy to support the facilitation of a roundtable event with Destination Management Organisations (DMOs) and Scottish Government officials as part of this engagement. DMOs are responsible for managing, supporting and developing tourism in their local area.

The tourism industry welcomes recognition of the role of marine tourism, including recreational boating and swimming in relation to socio economic aspects of the management of our seas. The marine tourism sector is a significant generator of vital employment and revenue generation for coastal communities, many of which are remote, island and/or rural.

This is evidenced by the recent report Crown Estate Scotland’s Private Moorings and Moorings Associations Socio-Economic Assessment¹⁰ report, which demonstrates the substantial contribution of marine tourism to Scotland’s economy. The recently published Economic Value of Boating Tourism in Scotland Survey 2022¹¹, found that sailing and boating is estimated to contribute £84 million in Gross Value Added and 3,100 Full Time Equivalent jobs – many in remote and rural communities.

We welcome the assurance that activities including recreational boating and watersports will be allowed within HPMAs. Appreciating that restrictions may be introduced, we would strongly recommend that any restriction is evidence based, but moreover that best practice is encouraged rather than any prohibition which may materially damage responsible marine tourism.

We support British Marine Scotland’s caution against measures which will increase costs/delays for leisure marine businesses. For example, introduction of permits may increase costs for small

¹⁰ <https://www.crownestatescotland.com/resources/documents/moorings-socio-economic-assessment>

¹¹ <https://britishmarine.co.uk/News/2023/April/Marine-tourism-plays-a-key-role-in-boosting-Scotlands-economy>

businesses or limit industry growth potential. The British Marine Scotland Workforce Skills and Training Survey (2022)¹² highlights that the leisure marine sector in Scotland is dominated by micro businesses, many of which are family businesses or community groups and many of which are facing increasing operating costs at present.

Moreover, we support British Marine Scotland and RYA's best practice joint initiative, The Green Blue¹³, which promotes environmentally responsible practices for marine business operators.

We support the Wild Scotland Best Practice Guidelines¹⁴ as a recognised standard in the sector, providing clear guidance to commercial operators on how to behave in nature and whilst in the vicinity of wildlife.

OPPORTUNITIES OF HPMAs

The tourism industry recognises the opportunities that HPMAs can serve as sites for education, outreach, and public awareness programmes, helping to raise awareness regarding the importance of marine conservation, promote sustainable eco-tourism practices, and engage local communities, stakeholders, and visitors in conservation efforts.

HPMAs can also offer opportunities for sustainable marine tourism and recreation, providing recreational activities such as diving, kayaking, paddleboarding, wild swimming and wildlife experiences that are compatible with conservation goals. This can contribute to local economies through tourism revenue, job creation, and supporting local businesses, while also promoting awareness and appreciation of the marine environment.

The tourism sector welcomes the opportunity to be enablers of education, and protectors of our natural environment, whilst ensuring environmental, social and economical sustainability for our communities.

CHALLENGES OF HPMAs

The primary focus of HPMAs is on conservation and management of marine environments and their associated biodiversity, rather than directly impacting coastal and island communities. However, there can be indirect impacts on communities, the wider tourism sector and supply chain, which may include:

1. **Prohibiting recreational activities can impact recreational opportunities** for local communities, tourists, and other stakeholders who may have been engaging in activities such as boating, fishing, or diving in the area. This may result in reduced access to recreational opportunities and potential loss of enjoyment and satisfaction for those who value these activities.
2. **Fisheries and livelihoods:** If fishing activities are restricted or prohibited in HPMAs, it can have an impact on local fishing communities that depend on those areas for their livelihoods. This can include loss of access to traditional fishing grounds or reduced fishing opportunities, which may affect the income, livelihoods, and cultural practices of local communities that rely on marine resources for their sustenance.

¹² <https://mymembership.britishmarine.co.uk/media/y1apcxuy/scotland-s-marine-industry-labour-market-2022.pdf>

¹³ <https://thegreenblue.org.uk>

¹⁴ <https://industry.wild-scotland.co.uk/delivering-best-practice/best-practice-guidelines>

3. **Economic impacts:** Prohibiting recreational activities in an HPMA can have economic implications for local businesses and communities that rely on recreational tourism. Businesses such as dive operators, boat charters, and recreational fishing guides may experience reduced revenue and potential job losses, which can impact local economies and livelihoods.
4. **Social and cultural impacts:** Prohibiting recreational activities in an HPMA may also have social and cultural impacts, particularly for local communities that have traditionally engaged in recreational activities in the area. It may disrupt cultural practices, traditions, and recreational traditions that have cultural significance for local communities.
5. **Compliance and enforcement challenges:** Prohibiting recreational activities in an HPMA may present challenges in terms of compliance and enforcement. It may require adequate resources, monitoring, and enforcement efforts to ensure that the prohibition is effectively implemented, and that recreational activities are prevented within the designated area.
6. **Management and governance:** The establishment and management of HPMA's will involve governance arrangements, regulations, and decision-making processes that can affect local communities, including their ability to participate in decision-making, access benefits, or have a say in the management of marine resources. This can have implications for the rights, interests, and participation of island and coastal communities in the governance of marine protected areas.

It is critical that any unintended consequences for waterside business operators, whether they are micro businesses or part of a diversified tourism offering, are mitigated – protecting livelihoods and fragile community economies. Time challenging or cost prohibitive licensing of activities should be avoided. HPMA's must be sustainably maintained on shore and not prohibit responsible economic activity.

Balancing the protection of the marine environment, whilst maintaining the local economic benefits from marine tourism and the benefits to health and wellbeing of enjoying water-based activities, is essential.

Where HPMA designated sites are proposed, with potential for recreational tourism activities to be restricted, a full local Business Regulatory Impact Assessment (BRIA) involving all potentially impacted sectors, alongside a robust, meaningful community consultation will be essential. Any decision making must be transparent throughout the process and supported by the local community, through engagement with local communities and DMO's.

Any restrictions should be proportionate, justifiable and reasonably enforced. How HPMA's are monitored, managed and enforced, including adequate resourcing, should be clear, consistent and effective, with results and unintended consequences reviewed on a regular basis to ensure the success of the policy. This methodology should be established at the time of site designation.

LEGISLATIVE FRAMEWORK

It is critical that the policy framework is evidence driven, proportionate and justifiable, underpinned by a robust legislative framework that is fit for purpose. Considerations must be made for issues that may be impacted by reserved matters as well as devolved powers.

The complexities of a combination of devolved and reserved legislative frameworks must be clearly identified and overcome before any further detailed work is undertaken. It is imperative that despite competence of Scottish Ministers to introduce powers through primary legislation within the Marine

(Scotland) Act 2010 for the Scottish inshore region (up to 12 nautical miles from the coast), the Scottish Government seeks confirmation that the UK Government will transfer powers to the Scottish Government for the Scottish offshore region (beyond 12 nautical miles out to the outer limits of the UK continental shelf). If that explicit agreement is not achieved, HPMA's will be restricted to inshore regions only.

Appreciating that HPMA sites will be designated based on scientific evidence, ecological importance, and conservation objectives, it is critical that the impact to onshore businesses and communities is also taken into account.

The implementation of the draft Policy Framework and Site Selection Guidelines will have financial, regulatory and resource implications on a wide variety of businesses and organisation and these must be fully understood prior to any legislative decisions being taken.

A robust BRIA and Island Communities Impact Assessment (ICIA) will be critical to the success of the legislative process and to mitigate against unintended consequences. These should be developed following consultation and in partnership with all sectors that may be affected, including DMOs and sector associations such as STA, Wild Scotland and Sail Scotland.

It is critical that this policy framework is correct before site selection guidelines are drawn up. Where new regulations are to be implemented, adequate transitional timing is critical to support changes to a new regime and business operation.

It will be fundamental that a clear management and enforcement regime is in place, and that management eco-system identifies where relevant Scottish authorities, such as Marine Scotland, in collaboration with stakeholders and local communities have a part to play.

Careful planning, stakeholder engagement, and adaptive management are critical to ensure that HPMA's achieve their conservation objectives and deliver benefits for the marine environment and local communities.

Following implementation, clear, consistent, nationally recognisable, positive messaging will be critical for visitors to understand the locations and HPMA's and any restrictions to activity once a site is designated. Failing to do so could compromise the visitor perception and experience.

CONCLUSION

The STA welcomes measures to protect and improve the marine environment, which is one of Scotland's key tourism assets and a vital source of our unique visitor food offer. There is the opportunity to both protect the environment will increase the enjoyment of those who enjoy water-based activities.

However, we caution that this must be done so with an understanding of the consequences on the many small businesses reliant on the water, which are vital to rural, remote and coastal communities.

The establishment and management of HPMA's should involve careful planning, meaningful stakeholder engagement, and consideration of local socio-economic and cultural contexts to minimise potential negative impacts on island and coastal communities, including wider parts of the tourism sector such as accommodation and hospitality providers.

Effective engagement with local communities and DMOs, incorporation of traditional ecological knowledge, and equitable benefit-sharing arrangements can help to mitigate any adverse impacts and ensure that HPMAs are designed and implemented in a way that is economically, socially and culturally appropriate, and supports the conservation and sustainable use of our valuable marine assets.

Marc Crothall MBE
Chief Executive
Scottish Tourism Alliance
17th April 2023

STA's response has been created in consultation with our Member Council and Executive Board.

STA Member Council:

1. Association of Leading Visitor Attractions
2. Association of Scottish Self-Caterers
3. Association of Scottish Visitor Attractions
4. British Amusement Catering Trade Association
5. British Holiday & Home Parks Association
6. Camping & Caravanning Club
7. Caravan and Motorhome Club
8. Confederation for Passenger Transport
9. Federation of Small Businesses
10. Green Tourism
11. Hostelling Scotland
12. National Outdoor Events Association
13. Sail Scotland
14. Scottish Agritourism
15. Scottish B&B Association
16. Scottish Beer & Pub Association
17. Scottish Country Sports Tourism Group
18. Scottish Destination Management Association
19. Scottish Golf Tourism Development Group
20. Scottish Incoming Golf Tour Operators Association
21. Scottish Independent Tour Operators Association
22. Scottish Licensed Trade Association
23. Scottish Tourist Guides Association
24. Scottish Wedding Industry Alliance
25. UK Hospitality (Scotland)
26. UKInbound
27. Wild Scotland