

Evidence to the Environment and Sustainability Committee inquiry into marine policy in Wales

September 2012

Wildlife Trusts Wales (WTW) is the umbrella organisation for the six Wildlife Trusts in Wales – Brecknock, Gwent, Montgomeryshire, North Wales, Radnorshire and South and West Wales working together in partnership to achieve a common aim. The Wildlife Trusts collectively have more than 28,000 members and manage over 200 nature reserves (of which 32 are coastal), covering more than 6,000 hectares of Wales' prime wildlife habitat, from rugged coastline to urban wildlife havens.

The Wildlife Trusts are working towards our vision of Living Seas, where marine wildlife thrives from the coastal shallows to the depths of the sea. We believe it is possible to achieve Living Seas around the UK within 20 years – a single generation – but only if the opportunities are seized now to make radical changes over the next five years.

WTW welcomes this opportunity to present evidence to the Environment and Sustainability Committee inquiry into marine policy in Wales. We have contributed to the written evidence provided by Wales Environment Link and Wales Coastal and Maritime Partnership, of which we are members. As such, we have focused our comments to focus on WTWs current areas of work, providing response to questions 2, 5, 6 and 7.

Summary

- Sustainable management of Welsh seas should be given greater prioritisation by decision makers in recognition of our reliance on the numerous ecosystem goods and services the marine environment provides. This should be supported with an assurance that there will be adequate financial and staff resources within Welsh Government and the new single body to meet existing legislative and policy objectives.
- The management of existing Marine Protected Areas must be significantly improved, and supported by effective enforcement, monitoring and resourcing to enable these sites to reach favourable conservation status.
- All bottom trawling and dredging should be prohibited from within the boundaries of all Marine Protected Areas.
- Momentum in the MCZ Project Wales should be maintained and Welsh Government should provide an announcement on the future of the project as soon as possible.
- There should be greater coordination at cross border locations to ensure a consistent UK approach to marine management, to fulfill commitments under the Marine Strategy Framework Directive and contribute to an Ecologically Coherent Network of MPAs.
- Engagement of stakeholders needs to be improved to promote support for all areas of marine policy.



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General response

For over a decade, the Wildlife Trusts have campaigned with other environmental organisations for new laws to provide better protection for the marine environment. We welcomed the introduction of the Marine and Coastal Access Act 2009 for providing Welsh Government with the tools needed to revolutionise the way we manage the sea in Wales. However, we have since been concerned about slippages in the implementation of the Act, with considerable delays evident in projects including MCZs, marine planning and sustainable fisheries management.

At over 15,000km², Welsh territorial waters almost double the size of Wales and provide numerous ecosystem goods and services, on which Wales is heavily reliant. However, we do not believe that the marine environment has been given sufficient prioritisation or resourcing to ensure delivery of sustainable management. WTW has raised these concerns in response to Government consultations on their emerging legislative framework, including 'Sustaining a Living Wales' and the formation of the Single Body. We also believe there needs to be greater integration between emerging and existing legislation to avoid any potential confusion that could emerge, for example, between the marine planning and National Resource Management Plan processes.

Question 2: Current status of marine protected areas in Wales and the role new marine conservation zones have in this network of protected areas

The Wildlife Trusts regard Marine Protected Areas (MPAs) as essential for the sustainable management of the Welsh marine area and at the heart of marine nature conservation. Along with sustainable fisheries management and marine planning, a well-managed network of MPAs will be critical to achieving Welsh Governments commitment to the UK Governments vision for '*clean, healthy, safe, productive and biologically diverse seas*¹'. Furthermore, a network of MPAs, made up of both existing sites and new Marine Conservation Zones (MCZs) will play an instrumental role in achieving Good Environmental Status under the Marine Strategy Framework Directive².

Existing Marine Protected Areas

At over 36% of Welsh waters, the Wildlife Trusts recognise that Wales is leading the UK in the area of our territorial waters designated as MPAs. Whilst these sites present considerable potential to contribute to the protection of the marine environment, designation without appropriate management does not constitute protection. At the last reporting round on the condition of our existing MPAs in 2007, over 50% of features were found to not meet favourable conservation status. To address this, there needs to be a significant improvement in the management, enforcement and monitoring of these sites to improve the level of protection and ensure they are able to meet their objectives. These factors will need to be met with an increase in resourcing available to support these sites. The next reporting round in 2013 will provide a key opportunity to assess any changes in management and the success of sites in currently meeting their objectives.

By 31st December this year, Welsh Ministers are due to report to the National Assembly for Wales on the extent to which a network of MPAs has been achieved in Welsh waters, and any further steps that will be needed to reach their objectives. This, along with the current

¹ Defra: 'Our Seas - A shared resource' 2009

² The Marine Strategy Framework Directive establishes a framework for the development of strategies designed to achieve Good Environmental Status in the marine environment by 2020. A network of MPAs is integral to this process.

review on MPA management in Wales should form an integral component of decision making regarding MPAs, and should be incorporated into the Marine Protected Area Strategy, which has remained in draft status since 2009, to provide a framework for Welsh Governments vision for Welsh seas.

Marine Conservation Zones

Furthermore, we welcome Welsh Governments intention to introduce greater protection for Welsh seas through the MCZ Project Wales. We recognise the value of Marine Conservation Zones; where carefully chosen, we believe that such sites can contribute considerable benefits to the protection of Welsh seas. We urge Welsh Government to maintain momentum in the project to ensure that MCZs are introduced; however, we believe there needs to be further consideration of the definition of highly protected and would favour the consideration of management of a site by site basis. We urge Welsh Government to make an announcement on the future of the project as soon as possible, and to make a strong commitment to all MPAs in the long term.

The Wildlife Trusts continue to call for all highly damaging activities, such as scallop dredging and bottom trawling to be prohibited from within the boundaries of all MPAs. We also call for highly damaging activities to be prohibited in areas where habitats and/or species are proven to be sensitive or at risk from activities such as bottom trawling, dredging, aggregate extraction, renewable and non-renewable energy developments. We support the sustainable use of marine resources; however, we believe there needs to be greater consideration of what can be deemed sustainable in the marine environment, and see the Living Wales program as an opportunity to start exploring this issue.

Question 5: Whether there is sufficient cooperation and coordination between the Welsh Government and its neighbouring administrations in relation to the management of its seas?

With 6 Wildlife Trusts in Wales, our localness ensures that we have been able to engage with communities around the coast at a local scale, whilst national officers have been able to engage with policy at a national level. In discussion with our colleagues around the UK, it is evident that whilst there has been dialogue between the various administrations on some policy streams, we would support a greater degree of cross-border cooperation to support the sustainable management of our seas. This will be crucial in the future to support greater integration of the designation and management of Marine Protected Areas at cross-border areas, and will be crucial in determining the level of success in achieving an ecologically coherent network of sites. Furthermore, it will be imperative that Welsh Government works closely with our neighbouring administrations in order to fulfil commitments to achieving Good Environmental Status under the Marine Strategy Framework Directive.

Question 6: Whether the Welsh Government has sufficient financial and staff resource to deliver on its marine policy and legislation objectives?

At 15,000km², the Welsh marine environment almost doubles the size of Wales, and contributes £2.5 billion to the Welsh economy through marine industry, of which £700 million is from coastal tourism. The marine environment contributes numerous ecosystem goods and services, all of which are reliant on our marine biodiversity and depend on a healthy marine environment. However, despite the importance of ensuring sustainable management of our sea, there is a lack of resourcing to fulfil existing legislation and policy and we feel that this needs to be addressed.

Whilst we are mindful of current constraints in public spending, we have concerns over the allocation of capacity and resources for Welsh Government's Marine Branch and Fisheries Unit to fully deliver their powers and duties under the Marine Act in Wales. To deliver comparable functions, albeit on a larger scale, in England (and UK offshore areas), the Marine Management Organisation has been established with 250 staff; and set-up costs of an English marine planning system estimated at around £40m, with running costs of £1m per annum³

Question 7: Whether stakeholders have been sufficiently involved in the shaping of new policies and the development of legislation?

Evidence from around the world suggests that effective stakeholder engagement is fundamental to the success of marine policy, fostering support for decisions and promoting compliance and self-ownership. Particularly regarding MPAs, experience shows that where stakeholders have been given the opportunity to effectively engage and have their opinions and needs represented and considered, they are more likely to accept the outcomes, and consequently, the MPA network will have more chance of success.

It has been evident from the significant number of responses to the MCZ Project Wales that sea users feel passionately about their local marine area and wish to have the opportunity to engage in the decision making process regarding how it is managed. As such, WTW support the provision of opportunities for sea users to engage in the MCZ project, and wider marine policy streams as they progress. However, we believe there should be greater streamlining of groups to input to the parallel processes underway as part of the MCZs, marine planning and fisheries discussions, to prevent stakeholder fatigue and duplication. Furthermore, we urge Welsh Government to maintain current momentum in the implementation of the various components of the Marine Act, whilst ensuring effective and meaningful opportunities for sea users to engage.

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³ Defra (2010) *Consultation on a marine planning system for England*. July 2010.