



Welsh Fisherman's Association  
Cymdeithas Pysgotwyr Cymru

The national voice of Welsh fishermen

---

Email to: [SeneddCCERA@assembly.wales](mailto:SeneddCCERA@assembly.wales)

29<sup>th</sup> September 2017

Dear Chairman

Re: **Turning the Tide**

Further to the recent publication of the Climate Change Environment & Rural Affairs Committee (CCERA) Report "Turning the Tide" summarising the Committee's inquiry into the Welsh governments approach to Marine Protected Area management, I am pressed to write on behalf of the Welsh Fisherman's Association-Cymdeithas Pysgotwyr Cymru (WFA-CPC) to express our concerns regarding our experience of the Inquiries engagement process and the reports content:

**ENGAGEMENT:**

- The WFA-CPC is the national representative body for Fishermen's Associations in Wales, our organisation is recognised as such by our Scottish, English and Northern Irish counterparts and importantly by Welsh Government. As Chief Executive, I have provided written and oral evidence to the former Environment and Sustainability Committee on numerous occasions. As such our organisational contact details are on record with the Assembly Researchers. However, neither the WFA-CPC nor any of our member associations were approached by the Committee's engagement/outreach to participate in this CCERA Inquiry into the management of MPA's, instead we learnt of Inquiry via 'Twitter' sometime after the formal launch in January 2017. In our view this was not transparent, equitable or inclusive and we believe fails to meet statutory obligations set through the Wellbeing & Future Generations Act 2015 and the Environment (Wales) Act 2016:
- Throughout the 'Turning the Tide' Report there is repeated reference to a Survey regarding the management of Welsh seas. The survey was conducted by the National Assembly Outreach Team but again the WFA-CPC were not invited to participate even though our contact details are held by the Assembly Researchers. In fact, we only learnt about the Survey in the Turning the Tide Report and by then it was too late to contribute. This also was not transparent, equitable or inclusive.
- According to the 'Turning the Tide' Report, 859 public responses were received to the Inquiry which were made to the Survey, however, no breakdown of Survey respondents have been supplied indicating who participated (Annex A & B only refer to written and oral evidence submitted). This is surprising given that the survey results may have influenced the Committee's recommendations and may influence readers of the Report. This is not transparent.
- The objectivity and balance of the Report is also questionable. A number of the contributors have a vested interest in marine protected areas and broadly represent a narrow segment of Welsh society. The views they express would largely be similar, however, smaller less prominent sections of society, such as fishing communities, if anything deserve a greater effort and balance to ensure their views are received and fully considered. For any process to be fair and reasonable it must fundamentally be objective, balanced and inclusive.

- Whilst in the main, contributors of written information generally remained within the consultation guidance of limiting answers to questions to 250 words there was an exception for one individual who was granted permission by Assembly staff to submit a 32 page response to the main Inquiry. From a stakeholder engagement point of view it would appear inconsistent and unequal to change guidance for one person whose views were well represented by their sectors contribution. This individual’s contribution is referenced 7 times within the Report whilst none of the written evidence submitted by other individuals was quoted at all. The particular individual concerned is a former EMSO who the report recommends should be funded again by Welsh Government. This was not a balanced and objective conclusion.
- The ‘Turning the Tide’ Report references quotes by contributors through each of the four chapters, the WFA-CPC are noticeably underrepresented in terms of inclusion and contribution to the Inquiry:

<b><u>SECTOR</u></b>	<b><u>NO. OF QUOTES USED:</u></b>	<b><u>%</u></b>
Environmental Groups	26	51%
Relevant Authorities Groups and EMSO’s	14	27%
Individual / One of Four?	7	14%
WFA-CPC	4	8%
	=====	
	<b><u>51</u></b>	<b><u>100%</u></b>

**General**

During my oral evidence to the Committee, with no prior notification I was asked questions about the Cabinet Secretary for Environment & Rural Affairs decision to proceed with newly proposed management measures to support a sustainable scallop fishery in Cardigan Bay. I was not prepared or expecting questions other than those published in the Inquiry. We subsequently provided additional written evidence as requested which has not appeared in the annexes or been considered within the Report.

**CHAPTER 02 – STRATGIC DIRECTION & LEADERSHIP:**

**14** – NRW’s recent evidence to this Inquiry stated that WG were providing a strong lead through the Marine & Fisheries Division, Marine Transition Programme and the MPA Steering Group etc. why would the Committee use misleading and old (2012) evidence by the former CCW within this section of the Report rather than NRW’s – New Evidence to this Inquiry?

**15/16** – Only reflects the opinions of others and does not include the views expressed by the WFA-CPC or the Statutory Nature conservation Advisors – NRW. This would appear to be selective use of contributions:

**STAFFING & RESOURCES:**

We would agree that the appropriate level of resource is critical given the additional responsibilities in the marine area resulting from cSAC designation and the ‘Wales Act’ and indeed the wider resource demands arising from the UK decision to exit the EU. We would advocate an immediate and ongoing review of resource/recruitment to ensure that policy objectives pre and post exit do not compromise, preparations for Wales’ ‘Day 1 Readiness’.

**For CCERA interest: Staff resources re Marine & Fisheries England:-**

DEFRA	400 -600
MMO	400
IFCA's	<u>150-200</u>
<b>Total</b>	<b>950 – 1750</b>

**Wales Marine & Fisheries Staff Total 63**

**25** - Refers to a disappointment from Environmental representatives that the WNMP will not take sufficient account of the impact of activities in MPA's. The regulatory framework already exists to manage activities within MPA's that is the purpose of the Nature Directives. It is not the purpose of the Marine Plan to duplicate and create confusion, the Marine Plan's purpose is to inform an evidence based plan led approach to assist consenting authorities in terms of future development within the Welsh marine plan area:

**28 & 30** - Preference for 7 management areas in Wales' seas each with a site officer approximate cost of £50,000 per site per year with additional funding for delivering projects:

*£50,000 x 7 = £350,000 per year x 6 years (statutory reporting period) = £2.1 million*

Given the recent move from core funding by NRW to project based activity this proposal would appear costly and regressive.

**GREATER PUBLIC UNDERSTANDING OF MPA'S**

**42, 43 & 45** - A number of EMSO have been in post for decades, if public awareness and understanding have not improved in that period, that presumably is one of the reasons why NRW have moved to a project led funding model. This approach follows the strategic work of the LIFE N2K Prioritised Improvement Project and would fund outputs rather than exclusively EMSO Posts

**CHAPTER 03. – THE NETWORK OF MPAs in WALES**

**58. Correction:-**

**Table 1:** Marine SAC's in Wales (not including SPA's) = 5,592km<sup>2</sup>  
Marine cSAC's in Wales (same level of protection) = 12,498km<sup>2</sup>  
Total EMS = 18,081km<sup>2</sup>  
The Welsh marine area overall total = 30,723km<sup>2</sup>  
(as depicted by blue boundary map Page 24) and thereby is in excess of 50%  
of Welsh seas:

**For information and contrast: -** Welsh land area = 20,782km<sup>2</sup>

Welsh land SAC's & SPA's = 1,478km<sup>2</sup> total:

**63, 64 & 65** – the selected sector contributions presented in these sections of the Report refer to favourable conservation status (FCS) as required by the EU Nature Directives with opinion being expressed in respect of marine SAC feature condition – the WFA submitted detailed evidence regarding the UK statutory reporting process to the EU in response to questions 3 & 10 of the Inquiry consultation. Within our written evidence we explain the misrepresentation of unfavourable condition at a Welsh marine level. Disappointingly the

WFA's evidence is not presented within the Chapter of the Report and therefore the Report fails to present a balanced and objective position and continues to support a misrepresented negative conclusion:

**68** – Several witnesses expressed opinion (supported by a 2012 UK joint statement), however Welsh Government requested the Joint Nature Conservation Committee (JNCC) to undertake an analysis of progress towards the development of an ecologically coherent network of MPA's in waters around Wales in 2016. JNCC summarised that “the MPA's in Welsh territorial waters make a substantial contribution towards the aim for an ecologically coherent network in the wider Irish Sea, Western Channel and Celtic Sea CP2 regions”. Highly protected sites or Reference Areas were not considered within the JNCC Report as a component or gap to achieving the Welsh contribution towards an ecologically coherent network.

Sites for mobile species have been approved by Welsh Ministers and Candidate SAC's for Harbour Porpoise which receive the same level of policy protection as a fully designated SAC. Furthermore, MCZ designations within the Welsh offshore will become the responsibility of Welsh Ministers in April 2018 through the Provision of Powers under the Wales Act.

In our considered opinion “Turning the Tide” is disappointing and unrepresentative of strategic direction and MPA progress within the Welsh marine area (acknowledged within WFA evidence submission). This raises further concern with regard to objectivity, inclusiveness, bias and equality.

#### **DATA & EVIDENCE**

**77** – Environmental organisations contributions, opinions only feature to support a presumed negative opinion regarding the progress of Assessing Welsh Fishing Activities. It is widely accepted that the high risk mobile fishing activities already assessed by the project are not historically or currently taking place on sensitive features. The project has established a transparent evidence base for WG to consider where necessary, management responses in consideration of constrained resources a risk based and evidence led approach has been applied by WG. As in preceding sections a one-sided opinion is repeatedly presented within the Committees Report – not transparent, inclusive or objective.

The WFA-CPC fully supports the sustainable management of natural resources and is a strong advocate for adaptive management within an ecosystem based approach underpinned by evidence led decision making, we believe that this is the best way to inform and engage all marine users equally, fairly and constructively.

In conclusion, the WFA-CPC lacks confidence in the CCERA Report which appears to be largely bias towards the views and opinions of a few individual organisations pursuing a narrow agenda. Given the time and effort necessary to prepare and submit formal evidence to Committee Inquiries we respectfully remain concerned as to the value of any further contribution by the WFA-CPC to future Marine & Fisheries related Committee Inquiries unless or until we are assured to the contrary.

Yours sincerely

Jim Evans

for and on behalf of

Welsh Fisherman's Association – Cymdeithas Pysgotwyr Cymru Cyf