

Inquiry into the management of marine protected areas in Wales - Consultation submission form

Your contact details

Name:	
Are you responding as an individual or on behalf of an organisation?	On behalf of Marinet Limited, an organisation campaigning to protect the marine environment. This is a supplementary response to that also made by our Chairman, David Levy.
Organisation (and role if applicable):	Marinet Limited (Reg. No. 9241919), Marinet Directors
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Would you like to be added to the Committee's contacts database for future inquiries?	Yes

Disclosure of information

The Assembly's [policy on disclosure of information](#) is available, please ensure that you have considered these details carefully before submitting information to the Committee. This policy can be requested in other formats by contacting the Committee Clerk.

Submitting evidence

If you wish to submit evidence, please send an electronic copy of your submission form to SeneddCCERA@assembly.wales.

Alternatively, you send it to: Committee Clerk, Climate Change, Environment and Rural Affairs Committee, National Assembly for Wales Cardiff Bay, CF99 1NA.



Background

Marine Protected Area (MPA) is the collective term for all forms of protected nature conservation sites in the marine and coastal environment. Sites can be designated under domestic, European and international legislation. MPAs can have different levels of restriction, for example, No Take Zones where many activities are prohibited, through to multi-use MPAs where lots of activities can be allowed if they do not have an adverse impact on the wildlife and habitats for which the site has been designated. Wales does not at have any No Take Zones, only multi-use MPAs. MPAs are the primary tool to conserve biodiversity whilst balancing the multi-use nature of the marine environment through the sustainable management of activities and natural resources.

The seas around Wales make up over half the area of Wales. There are 128 MPAs covering over 5500 square miles, or 35% of the Welsh seas and 75% of the coastline. This includes sites such as Skomer Marine Conservation Zone in Pembrokeshire that has been an MPA in some form for over 25 years.

In its inquiry into marine policy in Wales, the Fourth Assembly's Environment and Sustainability Committee expressed concern about the level of priority given to the marine environment by the Welsh Government. Amongst its recommendations, the management of Marine Protected Areas was highlighted as a priority area for improvement.

The Climate Change, Environment and Rural Affairs Committee is calling for evidence to support its inquiry into the management of marine protected areas in Wales.



Objectives

- To assess the management of Welsh marine protected areas with a view to identifying opportunities to maximise the economic, social, environmental and cultural benefits that can be derived from them.
- To understand what the implications of leaving the European Union will be for marine protected areas and to identify any issues that will need to be addressed during the exit process.

Submissions should focus on the terms of objectives and address the following questions.



We ask that respondents limit their answers to each question to no more than **250 words**.

Consultation questions

Question 1

Has the management of Welsh seas received sufficient resource and strategic direction to enable sustainable management that supports the well-being of current and future generations? (250 words)

No.

There appears to be little or no management, nor a strategic plan, nor enforcement thereof for most MPAs.

Prior to designation, comprehensive baseline monitoring should be undertaken of each MPA as a whole and not just its “protected features”; and, a management plan should be drawn up which highlights deficiencies in the ecosystem and sets targets and timetables for bringing the area back to its prime potential as a healthy ecosystem.

Protection of fish nursery areas, and the flora and fauna which support them, should override any short-term economic arguments.

No Take Zones should be designated for all fish nursery areas or other areas where disturbance would degrade the ecosystem. These measures are essential to allow fish stocks and ecosystems to recover from their commonly agreed degraded condition – see Charting Progress 2*

This would benefit fishermen in the long term, even if it is perceived as causing hardship in the short to medium term. Regular monitoring is also essential, with stringent enforcement of any necessary measures.

Fish generically are a key structure in the marine ecosystem, with both higher and lower orders of marine animals and birds heavily dependent for their own well-being on the prosperity of fish. A primary focus on fish and their ecological status and condition is therefore a strategic need of sustainable marine management.



* chartingprogress.defra.gov.uk/

(219 words)

Question 2

How should Area Statements, to be developed by Natural Resources Wales, cover Welsh seas? *(For example should the sea adjoining each welsh Local Authority be included in its Area Statement, or should the marine environment be considered separately in one or more marine Area Statements?)* (250 words)

The Marine environment is fundamentally different from the land environment, so the marine environment should be considered separately in Marine Area Statements.

As the marine environment contains many migratory species, these species rely on finding good ecosystems in all the areas that they pass through. Hence Marine Area Statements need to cover large marine areas and need to be established at Governmental level. Local Authorities will have the opportunity to take part in the development of these Area Statements, as consultees.

(81 words)



Question 3

How well are Wales' MPAs currently being managed?

(This can include aspects such as the condition of sites, staffing to deliver management, surveillance and enforcement activities and the data on the extent of activities taking place in MPAs) (250 words)

Poorly, see our response to Question 1.

Until such time as the marine ecosystem as a whole, and specifically maintenance of its integrity, are recognised as the fundamental principle for the management of human activity and its impact, then the function and performance of government will have failed and, as a consequence, MPA management also

It has to be recognised that the focus and purpose of marine management and conservation relates to human activity, not to marine species or physical/chemical features. These natural features (animate and inanimate) are governed by their own processes and when damaged remedy is made by not seeking to interfere or regulate these natural features but rather by, and this is of fundamental importance, regulating the human activities which have caused this damage.

Marine management is, first and foremost, about human management. (136 words)

Question 4

What are the key issues affecting the effective management of multi-use MPAs? (250 words)



The key human issues are insufficient money, staffing levels, compromises between the competing stakeholders, and expertise.

The protection of the ecosystem as a whole should be the top priority, with no compromise allowed.

A management plan should be drawn up before designation of the MPA, and this should be accompanied by baseline monitoring, then stringent enforcement of the identified conditions associated with the MPA designation.

This needs to be supplemented by regular monitoring to ensure that the ecosystem remains healthy. The management plan should be reviewed at regular intervals (every three – five years max) as a check to see whether the plan is adequate to protect the ecosystem in the whole of the MPA.

(114 words)

Question 5

Do existing Welsh MPAs currently provide the right protection for the conservation of Welsh marine biodiversity? (250 words)

No.

It is pointless to designate a MPA with specific “protected features” unless this designation is accompanied by an adequate management plan, with strong enforcement measures and regular monitoring of the state of these areas, in order to protect the ecosystem as whole within each MPA. The “protected features” do not exist in isolation, but are integrated within and dependent upon the whole ecosystem of the MPA.

Currently none of the Welsh MPAs is designated as a No Take Zone (NTZ).

Although the large area designated as MPAs around the Welsh coast means it would be impractical to denote the whole of every MPA as a NTZ, we believe that all Marine Conservation Zones



(MCZs) and all fish nurseries within MPAs should be designated as NTZs. Any other fragile ecosystems within MPAs which would suffer disturbance from fishing should also become NTZs.

The key question regarding human activity within a MPA is: does the activity adversely affect the ecosystem as a whole? If it does, then the human activity needs to be restrained, should be subject to conditions, and should be required to be re-licensed on a regular basis.

(190 words)

Question 6

What lessons can be learnt from current MPA management activity in Wales (including designation, implementation and enforcement)? (250 words)

The system is not functioning as it could, and as it should.

For it to do so, MCZs and MPAs should be ecologically coherent in structure and practice i.e. each supporting one another in order to provide full health for the overall marine ecosystem within the government's jurisdiction. Presently this coherence is absent, and not clearly set out in a comprehensive form to be achieved by a specific date.

For this to occur, government in Wales needs to establish an arm of administration with specific responsibility for marine affairs. This will provide accountability. This arm of government would formulate policy, administer policy, assess the performance of policy, and enforce policy. In short, it would have the sound and healthy functioning of the marine ecosystem as a singular focus. Upon this yardstick it would be accountable.

Until this occurs, the present performance of government and MPAs will fall short of what is necessary and, importantly, achievable.

(155 words)



Question 7

Are there MPA examples or practices elsewhere that Wales can learn from? (250 words)

Wales can look elsewhere to see how these matters are tackled.

However, this is not really the issue. That issue is that Wales understands the principles upon sound management of human activity is based, and seeks to implement this based on its own initiative.

Sound management is a democratic process, as much as it is a scientific, financial, and administrative one. Management requires consent and ownership by those people who derive their livelihood from the sea. It must therefore be built on this basis so that people derive the benefits from sound management.

If people respect their environment, if people see that the quality of the environment depends on their behaviour and responds to their behaviour, and people are made accountable for their behaviour, then a genuine management system will have been designed and it will succeed.

From this, the present degraded ecosystem will respond, and restore itself.



(148 words)

Question 8

The majority of Wales' MPAs are designated under the EU Habitats Directive. How should the Welsh Government's approach to MPA management take account of the UK's decision to leave the European Union? (250 words)



The Welsh Government should retain all the existing provisions and designations established under EU law.

From that point onward, it needs to establish a system of management of human activity so that this activity, licensed wherever necessary (licensing provides finance and accountability), respects the integrity of the ecosystem of the sea as a whole under Welsh jurisdiction.

This is the route to maximum economic benefit from the seas.

This is the route by which the natural systems operating in the overall system can function properly and thus restore the overall health of the sea.

This is the route whereby the seas have democratic ownership, by both the users of the sea and society as a whole.

(116 words)



Question 9

If you had to make one recommendation to the Welsh Government from all the points you have made, what would that recommendation be? (250 words)

Management plans should be set up before designation of each MPA, and this management (of human activity) should be based on the preservation of the ecosystem both within the MPA and with regard to the MPA's place in the sea as a whole, with stringent baseline monitoring, regularly repeated, and strong enforcement of the required protections necessary to preserve or enhance the ecosystem.

Question 10

Do you have any other comments or issues you wish to raise that have not been covered by the specific questions? (250 words)

If you want to see a marine ecosystem functioning as near as presently possible in accordance with “natural conditions” in UK seas, then read the recent account provided by George Monbiot, see

<http://www.marinet.org.uk/george-monbiot-presents-the-case-for-marine-reserves-with-no-fishing.html>

If you want to see an enlargement of Marinet's thinking regarding the matters being considered by the Welsh Government (MPA management), then see our recent evidence to the Environmental Audit Committee of the Westminster Parliament, see <http://www.marinet.org.uk/campaign-article/marinet-evidence-to-environment-audit-committees-inquiry-into-uk-delivery-of-mpas>

