

For the attention of : Lindsey Booth-Huggins, Marine Management Organisation.

Dear Lindsey,

I thank you for your email copy of your letter of 2nd August (attached), and your advice that you have also written to Marinet members, Pat Gowen and Mike King. They too have informed me of your correspondence. I note the near identical nature of your letter to each of us, and so assume that this is a general letter to people who have made submissions of evidence, rather than a personal response.

I should like to make clear to you, on behalf of Marinet, a couple of points with regard to our submissions and the nature of the process for the determination of licences.

Firstly, it is difficult for us not to conclude - and we have long experience in making submissions to the various agencies who have determined marine aggregate licence applications over the years - that there are two classes of evidence. One class ("first class") which is given credibility and preference by the licencing agency, and another class ("second class") which is politely acknowledged but essentially discounted.

In the first category ("first class") is all the evidence submitted by the aggregate companies, their paid "scientific" consultants and which is "peer-reviewed" by government agencies. This evidence is regarded by the licencing authority as unimpeachable and when the evidence asserts some "fact" or opinion that "fact" or opinion is considered to be undeniably correct.

In the second category ("second class") is all the evidence which is submitted by the public and non-commercial (non-aggregate) interests, and this evidence is treated as essentially "non-scientific", of dubious quality, and therefore of little legitimacy.

Let me say that I seriously hope that the Marine Management Organisation is not going to allow its duties and performance to fall foul of this profoundly unsound methodology of assessment. You will, without doubt and for proper professional reasons, robustly assert that this will not be allowed to be so. We will be greatly assured to receive this statement, but let us be clear that we will be looking for evidence of the truth of this statement when the MMO makes its decision. We judge matters on the evidence.

The second point Marinet wishes to make clear is that we have questioned the scientific methodology - in essence, we have questioned the rigour of the science - underlying the MAREA offshore wave model and its associated wave regime. We have drawn this matter to the specific attention of the Marine Management Organisation, and we have asked that your experts examine this matter in close detail. Therefore, when the MMO decision document appears, we expect to see clear documentation by the MMO of the method of analysis undertaken by the MMO's experts, and a clear record of their judgement of the rigour of the scientific data upon which the offshore wave model and its associated wave regime is based. If this is not evident in the MMO's decision document, then we will be asking the MMO further questions about this. The same also applies to the other questions that Marinet members have raised about the rigour of the science used by the licence applicants.

I appreciate that this is a fairly blunt letter in response to your kind advice and email of today's date. However, I do not want you to be under any illusion about how seriously Marinet members consider these licence applications to be, nor the length of experience they have of these matters, nor the determination and resolve which they give to the protection of our marine environment and coast.

Hence, as you consider the submissions by Marinet members, if there is additional help or clarification which we can offer, please do not hesitate to contact any of us.

Sincere regards,  
Stephen Eades.  
On behalf of Marinet.

cc. D. Levy, Marinet chair, Pat Gowen and Mike King.