



Marine Information Network
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7th July 2007.

For the attention of: Mr. Graham Singleton, East Channel Association, Cemex UK,
Baltic Wharf, Elm Street, Marine Parade, Southampton SO15 5JF.

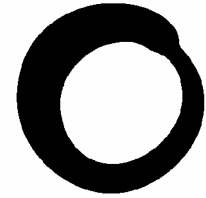
Dear Mr. Singleton, Eastern English Channel : Regional Monitoring Programme.

Thank you for your invitation to attend the East Channel Environmental Network (ECEN) meeting on 17th July at Baden Powell House, Kensington, London. MARINET will be represented at this meeting by myself and Mr. Bill Rigby.

As we wish to explore the effectiveness and adequacy of the 5 Year Monitoring Programme at this meeting, we felt it would be helpful if we set down for you some preliminary questions on the subjects we wish to examine. This will then give you a chance to collect together any necessary information you believe may be required in order to give a full reply to ECEN members.

These questions are:

1. Now that the Technical Working Group is established and operative, would it be possible for one or more ECEN members to attend the meetings of the Technical Working Group ? This would provide those ECEN members that are interested with valuable experience of the monitoring programme.
2. Presumably the meetings of the Technical Working Group are minuted. Therefore would it be possible for these minutes to be circulated to ECEN members ?
3. We are advised from the Regional Environmental Monitoring and Management Report (REMM), April 2007, that dredging is now active in Areas 461, 475, 473 East and 474 Central. Also, that positive Government Views (GV) have been given for Areas 473 West, 474 West, 474 East and 464/458, and that GVs are being presently sought for Areas 478 and 477. Could you please advise whether this statement is accurate for July 2007, and what changes you anticipate in new dredging activity and licensing during the next 12 months.



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4. In determining whether adverse impact is occurring due to dredging, any monitoring programme must have yardsticks by which it measures impact. These are generally formulated or encapsulated within the concept of “thresholds” i.e. a measure of impact, beyond which the impact is deemed to be potentially significant and/or adverse.

We have asked that these “thresholds” be identified before dredging commences. Our rationale is – if you are going to test a proposition, you decide before embarking on the test what evidence will prove or disprove the proposition, and then seek to collect the evidence.

So far, the Technical Working Group (TWG) and East Channel Association (ECA) have set no thresholds for any of the dredging – despite our request that these thresholds be set. We regard that such thresholds are essential because the precautionary principle/approach requires the setting of limits, even if the scientific evidence for an exact threshold is not yet evident.

All the TWG and ECA have said is that these thresholds will be determined in one to three years time. Please will the TWG and ECA explain to the East Channel Environmental Network how these thresholds will be set for:

- a/. The whole East Channel area.
- b/. The individual dredging sites.

Further, can the TWG please supply the ECEN with the definition of the term “adverse impact” which it will be using in its 5 Year Monitoring programme.

5. Area 461 and 475, where dredging has already commenced, is a very significant habitat for the brittlestar, *Ophiothrix fragilis*. Will the TWG and ECA please explain how the impact on this brittlestar colony and habitat is being assessed. And, will the TWG and ECA please explain their definition of “adverse impact” in this particular context.

6. Area 464/458, where a positive GV has been obtained, is a major site for the fish species *Trisopterus luscus*, known as Bib or Pouting. Will the TWG and ECA please explain how the potential impact on this species will be assessed, along with their particular definition of “adverse impact” in this context.

7. The whole East Channel dredging area is a major site/habitat for the shellfish species *Aequipecten opercularis*, known as Queen Scallop. Will the TWG and ECA please explain how the potential impact on this species will be assessed, along with their particular definition of “adverse impact” in this context.

8. Significant parts of the East Channel dredging area, particular where gravel substrate predominates, is a major traditional spawning and nursery ground for the fish species *Clupea harengus*, known as Herring. Will the TWG and ECA please explain how the potential impact on this species will be assessed, along with their particular definition of “adverse impact” in this context.

9. Significant parts of the East Channel dredging area constitute a protected habitat known as “sub littoral sand and gravels” under the United Nations Convention on Biodiversity i.e. the sandy and gravely character of the seabed support a protected marine habitat and a distinctive benthic (biological) community. This benthic community is sensitive to damage resulting from smothering by sediment i.e. should the dredging create a significant load of suspended sediment, either by the actual dredging on the seabed or, more likely, through the discharge from the dredger of unwanted

material (sediment plume), then the benthic community may experience smothering. Will the TWG and ECA please explain how this potential impact on the benthic community in the East Channel area will be assessed, along with their particular definition of “adverse impact” in this context.

10. In the Regional Environmental Assessment (REA), January 2003, prepared by the East Channel Association, Table 4.1 listed the following fish species (along with other species not listed here by us) as being the principal fish species in the Eastern Channel, along with their use of the area for spawning and as a nursery (Table 4.2).

<u>Species</u>		<u>ICES Area VIIId</u>		<u>ECR</u>	
		Spawning	Nursery	Spawning	Nursery
<i>Dicentrarchus labrax</i>	Bass	Yes	Yes	Yes	No
<i>Gadus morhua</i>	Cod	Yes	Yes	Yes	No
<i>Solea solea</i>	Common sole	No	No	No	No
<i>Clupea harengus</i>	Herring	Yes	Yes	Yes	Yes
<i>Trachurus trachurus</i>	Scad	No	No	No	No
<i>Sprattus sprattus</i>	Sprat	No	No	No	No
<i>Scophthalmus maximus</i>	Turbot	Yes	Yes	Yes	Yes
<i>Merlangius merlangus</i>	Whiting	Yes	Yes	Possible	No

In the Regional Environmental and Monitoring Report (REMM), April 2007, prepared by the ECA, Table 7 summarises the most frequently occurring species present in the 4m beam trawls. None of the above species identified as being principal fish species in the January 2003 REA appear in the summary of the “most frequently occurring species” in the 4m beam trawl in the REMM, April 2007. Accordingly, we wish to ask the Technical Working Group and the ECA whether their current monitoring programme for fish species in the Eastern Channel is sufficiently effective. Is it identifying the principal fish species and their abundance? And, if dredging were to have an adverse impact on these fish species and their populations, how will this potential impact be assessed, and what is the definition of “adverse impact” in this particular context?

We advise that we intend to ask the above list of ten questions, with supplementary questions dependent upon the answers received.

Yours sincerely

S. D. Eades
On behalf of
MARINET.