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31st August 2009.

For the attention of: Stuart Lowe, East Channel Association, MarineSpace Ltd.,
P.O. Box 6687, Wimborne, Dorset BH21 9DR.

Dear Stuart, East Channel Environmental Network : Follow-up Comments.

At the East Channel Environmental Network (ECEN) meeting on 16th July it was agreed that members attending the meeting could submit to you supplementary comments and thoughts regarding the matters which were discussed at the meeting, and that you would circulate these to ECEN members and place them on the East Channel Association (ECA) website.

I have consulted with my colleagues David Levy and Bill Rigby who attended that meeting, and David Levy has advised me of a number of points that he would like to bring to the attention of ECEN members. These are recorded below.

At the meeting on 16th July MARINET also offered some thoughts to ECEN members on how the monitoring programme might be improved. I have therefore included these in this letter, following David Levy's comments. We would be grateful if these thoughts on the monitoring programme could be similarly submitted to ECEN members by you for their further consideration.

Comments of David Levy.

Dear Colleagues

The Marine and Coastal Access Bill is scheduled for completion as an Act of Parliament by October/ November 2009. Central to this Act will be the role of the Marine Management Organisation (MMO) and the role of sound science overseeing their deliberations. It is with this understanding that we would like to make some observations about the research work you have undertaken over the past four years.

The presentations made at our last meeting of the East Channel Association at the Baden Powell House demonstrated the cutting edge research work you are involved in and this work opens up a vista on the reality of the effects of dredging and plume activity on the seas around identified sites of dredging activity. Of course those conclusions being drawn up by this research are only operating at 23% site capacity, so :

Question One

What formula do you use for establishing the impact on the environment of 100% site extraction activity ?

During the meeting I flagged to you and likewise to the MMO the need for environmental impact assessments of smaller grain sizes and ultrafine silt particles on the biodiversity affected by the plume.

This brings into question how far you should be monitoring the plume as the finer silt particles will travel much further. Taking on board the point made by Professor Mike Cowling from the Crown Estates that these are not like man-made particles but naturally occurring grain particles, I would have to say we are both right. The larger grain particles which you are concentrating on will fulfil Mike Cowling's position, but it is within the silt that potential toxicity will exist. It is to be noted that toxic materials released into the marine environment tend to be reconcentrated in silt.

Question Two

Has the current monitoring on dredging ships included chemical analysis of the discharge that makes up the plume with a programme that can exclude this as an issue ?

Question Three

Has the research considered widening the scope of where the plume grounds, and has the Association made contact with university and academic research bodies on the effects of silt on marine and fish life ?

This link may surprise some of your Association but the levels of toxicity within fish is of concern. Currently some fish can only be consumed once a week according to government advice. Contact with academic authorities will open doors to awareness and this will make this research programme fuller and with a validation that Cefas currently don't appear to be offering. I would have seen them as being the body to raise these issues especially prior to the design of a research programme.

Although the tonnage was not calculated, Prof Mike Cowling congratulated the Association on the larger grain size discharge that was reported to have been falling direct to the sea bed. It would be sound science to have that discharge tonnage figure.

Question Four

How do we know it falls straight down ? I would have expected to see mounds of the grain discharge showing up on the reconnaissance imaging of the sea bed. It showed a wreck clearly,

therefore it should have shown evidence of your statement. This monitoring should provide empirical evidence.

I would like to thank the ECA for the opportunity to engage with the dredging industry and in helping with our understanding of the dynamics that make up our seas, and what impacts positively and negatively upon them. Much of the current evidence is very reassuring. I would wish to be equally reassured about the issues I have raised with you all. My colleagues have other issues too and we look forward to open discussions and engagement in the arena of openness and transparency.

Cordially.

David Levy
MARINET

Additional MARINET comments on the Monitoring Programme.

Dear ECEN Members,

We greatly value the work being undertaken by the ECA and its consultant, Stuart Lowe, and we would like to thank the ECA and Stuart for their presentations on 16th July and for the receptive manner in which questions were taken. These additional thoughts are designed to improve the nature of the monitoring programme, some of which were flagged up at the meeting.

1. The Herring survey needs to indicate the importance of the herring breeding sites within the ECA area relative to the full range of herring breeding sites in the East Channel as a whole. Thus, if sites are lost within the ECA area, we are able to assess the extent of significance.
2. There is now extensive data as to the biological and physical character of the licensed dredging sites and the reference sites. The similarity between the reference sites and the dredging sites now needs to be portrayed, side by side so to speak, so that this similarity is evident. With this evidence base, it will then be possible to determine whether there is any change within the reference sites themselves, and whether there is any change in the dredging sites relative to the reference sites. Thus, we will have a measurement of change.
3. Cefas, Natural England and JNCC (and possibly others) are providing the independent verification of the monitoring procedures and conclusions from dredging in the ECA area. Those stakeholders, such as ourselves, who are not part of this independent verification process would welcome an annual report from these independent monitors (Cefas, NE and JNCC) of their assessment of the monitoring and conclusions being provided by the East Channel Association.
4. The extent of change, and the significance of the change, are key issues in deciding whether aggregate dredging in the ECA area is acceptable or not. Central to the assessment of significance is the question of whether thresholds are being exceeded. Prof. Mike Cowling has advised that the term threshold means the predictions of change set out in the original REA. It would therefore be helpful to restate this full range of predictions, both in order to know precisely what these predictions are, and to see whether the range of predictions is adequate (i.e. full and comprehensive or whether additional parameters ought, upon reflection, to now be added).

5. The ECA should elect to become a member of the MCZ East Channel Regional Project (identifying the marine conservation zone required by the Marine and Coastal Access Act), and should recommend that one or more of the ECA area reference sites should be MCZ sites identified by the East Channel MCZ Regional Project.

Sincere regards,

Stephen Eades.
On behalf of MARINET.