MBA written submission supplied to support oral evidence being given to the Joint Committee on the Draft Marine Bill on the 19th June 2008.

The MBA has three specific areas associated with its area of expertise that it wishes to urgently address:

1. **Strong links to the research community.**
   
   - The MBA is pleased that the MMO will seek to utilise research in seeking to carry out its function (Clause 23 (1) & (2), p49). We would recommend that there are strong mechanisms for ensuring that marine scientific research and advice from experienced marine scientists is considered in *the first instance* by the MMO when carrying out its functions. i.e. it has to be seen that marine plans, MCZs etc are being built on a good foundation of scientific evidence – it is not good enough just to assess the science once a lot of decisions have been made. For example DELOS/PRIMARE. It is still unclear what the mechanisms are for making sure the relevant research is taken into account? i.e. will there ‘in house’ marine experts? How will input from NERC and other research centres be taken into account?

   - The issue of MMO activities being based on scientific evidence is also important in ensuring that the best available conservation science is used to make decisions about protection of species and habitats and that nature conservation, as one of the duties of the Marine Management Organisation (MMO), is supported by conservation scientists within that organisation (and/or a Conservation Advisory Committee could be considered).

   - There is some concern over the statement “*a combination of formal town and planning qualifications, and experience of strategic project management and policy development…….. we think that these skills are applicable and transferable to planning in the marine environment*” (policy statement 3.46). Although there is then a further statement that marine expertise advice will be given, we would wish for some reassurance that evidence on environmental change from scientific research (which will be relevant to
planners) e.g. work being undertaken on the impact of renewable energy devices or DELOS type work – this was an excellent example of planners, engineers and scientists working together to plan for the coastal environment. will be included in any evidence gathering for marine spatial planning. It is not adequate to let terrestrial planners (driven largely by economic and political considerations) to be the main force in developing marine spatial plans where there should be a primary emphasis on marine environmental protection.

2. Coordination of monitoring

- One of the remits of the MMO is to "improve coordination of enforcement and related monitoring activities and make best use of information and data" (Impact statement, p9). It would be useful to have a more explicit mention, therefore, of the role the MMO is expected to play in coordinating monitoring such as that required to ensure conservation objectives are reached for Marine Conservation Zones (MCZs) (See policy statement 3.86). For example, will the coordination activities of the United Kingdom Marine Monitoring and Assessment Strategy (UKMMAS) now come under the remit of the MMO? This relates to point 1 as the UKMMAS is also seeking a way to ensure that marine scientific research is being utilised for making assessments and supporting policy aims such as establishing baselines for ‘Good Environmental Status’.


- There are several points in the Marine Bill and supporting material where "important" features for biodiversity conservation are mentioned or are relevant (for instance, Policy Paper 3.78; Bill Part 4, clause 106 (2)). We have noted, however, that there is no reference to the list of Nationally Important Marine Features (NIMF) for species and habitats that were developed as a part of the Review of Marine Nature Conservation. Although the candidate NIMF list is long and needs ‘rationalisation’ (what that rationalisation should include has been itemised to Defra and JNCC), it would be an important tool for environmental assessments and for MCZ selection and management.

- We drew attention (Point 6) in response to the Marine Bill White paper on 6 June 2007 to the importance of addressing biosecurity in relation to the import and movement of non-native species. Such activities should be a function of the MMO and mentioned in Annex F. Indeed, we note that the Bill does not mention shellfisheries or mariculture in general which seems a major omission. The import of non-native species deliberately for mariculture and the accidental import and movement of ‘hitch-hiking’ non-natives on them is a major cause for concern as many become pest species. Measures could also be taken with regard to vessels entering UK waters or moving around within UK waters that are fouled and likely to
introduce non-native species to new areas. All-in-all, non-native species are a major threat to native biodiversity and it is remarkable that there is no mention of measures to prevent or monitor their importation or subsequent movement around the coast or at least to make it a responsibility of the MMO to develop measures.

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