To whom it may concern:

PRE-CONSULTATION ON THE DRAFT UK MARINE POLICY STATEMENT

1. The Marine Biological Association (MBA) is a Learned Society established in 1884. The MBA has about 1000 members and runs The Laboratory in Plymouth where 60 staff work. MBA members have been at the forefront of providing scientific information to support marine environment protection, management and education and much of the scientific information that underpins decision-making about environmental protection has come from work undertaken at the Laboratory.

2. The MBA is a founder member of the Plymouth Marine Sciences Partnership, a federation of seven partners based in Plymouth all of whom tackle different aspects of marine science and technology research and training in a complementary way.

General Comments on Chapter 1.

3. In general, we found that the draft MPS adequately and accurately covers the necessary guidance. However, there are some misrepresentations of science and conservation issues which we address below.

4. In the preamble (1.3), the statement is made that an aim of the MPS is to “Encourage a sustainable marine environment including protection of our most valuable marine habitats, species and most important heritage assets” An obvious starting point to achieving such an aim is to understand what ‘assets’ the UK holds and where they are. We are aware of very large gaps in our understanding of the character and biological composition of seabed habitats within the UK seas and that the maps of seabed types are often inaccurate. Without accurate information of what is where, measures such as the identification of representative Marine Conservation Zones (and of other measures in devolved administrations) including for protection of sensitive features is bound to be incomplete. Filling those gaps and improving accuracy is an important step. Attention might need to be given to Section 2.7 to allow for adjustments to the ‘network’ of MPAs after 2012.

5. Section 1.4 mentions integration with terrestrial planning. That integration is important where terrestrial infrastructure (coastal defence, outfalls, harbour developments) impinge on the sea, which should perhaps be made clear.

6. We particularly welcome (1.9) the stated intention to co-ordinate across boundaries as, of course, the sea and its biogeographic provinces takes no notice of political
boundaries. However, there is no detail on how such co-ordination might occur so that common standards are applied to environmental assessment, identification of protected areas etc.

7. In the footnote to 1.10 and more fully in point 1.13, it is explained that the IPC in reaching its decisions “must have regard to the Marine Policy Statement but subject to certain exceptions must decide in accordance with the relevant NPS.” There is still concern that this major activities in UK seas such as port development and large offshore energy developments are outside the scope of the MPS. It is not clear what will happen in the event of conflict – does the MPS take precedence over other National Policy Statements. This also highlights the need for joined up cross-departmental thinking in developing the MPS.

**Does the document contain a clear statement of policy objectives applicable at the UK level for the marine environment? Are there any policy objectives that should be added, for clarity?**

8. In 2.2 the vision for “clean, healthy, safe, productive and biologically diverse oceans and seas” is referred to. Information from, or at least a reference to Charting Progress 2010 should be provided as it contains a useful background to the development of this vision. More importantly, some definition of the words in the vision is also provided in CP2. This is important as “productive”, for example, is used here in a very specific sense and not used in the way most scientists would use it. As this vision is the driver for the MPS and there will be a wide audience for the eventual formal consultation this would be very useful information to include.

9. The statements in Figure 1 are welcome. We observe a typographical error in “Our oceans support viable populations of representative, rate, vulnerable, and valued species.” “rate” should be “rare”. Also, “representative” in relation to species does not make sense. We feel that the point should include habitats and therefore read: “Our oceans support viable populations of rare, vulnerable, and valued species and of representative, rare, vulnerable and valued habitats.”

**Is any further information required at the UK level to support marine planning?**

10. In 2.5 it is stated that the UK administrations “are committed to halting the decline in biodiversity and the loss of habitats” and “are also committed to allowing damaged ecosystems to recover”. Accepted that 2.6 makes reference to baseline targets such as GES, the language in 2.5 does not reflect a positive approach on behalf of the administrations to achieving the vision for UK seas (healthy, biologically diverse etc). It would be good to mention that the goal of marine conservation is not just damage limitation but to achieve the UK vision (which will be informed by the legislation in 2.6).

11. It is not clear why a reference to policy objectives for coastal / flood defence are not included in detail in this chapter.

12. Reference should be made somewhere to Research and Development and education. This may not be covered by specific marine policy objectives but is a key
activity which needs to be considered as underpinning and contributing to many of the other sectors as well as being an activity in itself.

13. Section 2.43 on tourism is weak – this is a key sector for consideration in the marine and coastal environment and this paragraph does not reflect its importance. The same criticism can be made of sections 4.70 – 4.72.

• Does Chapter 3 set out the key high-level considerations that need to be taken into account when developing marine plans? Are the most significant impacts and pressures identified?

14. Under ‘Marine ecology and conservation’ (sections 3.18 – 3.29) we would expect to see some guidance that all plans and projects should seek to minimize adverse effects on biodiversity and especially to protect features (species and habitats) that are rare, scarce in decline or threatened with decline (sensitive to the activity being considered) whether or not in a marine protected area.

15. Section 3.40 includes ocean acidification as a part of climate change which it is not. Ocean acidification should be referred to separately as another effect of rising CO2 levels. The reference to “Adaptation including of the marine environment” is poorly worded and unclear.

16. Section 3.42. The reference to “increased storminess” needs explaining – if this means more storms then this is incorrect based on latest evidence.

17. Section 3.44 needs to be more carefully written as climate change is used too ‘loosely’ – it is some of the results of climate change such as rising sea level and changes in storm intensity that will cause problems.

18. A major gap in the list of activities in ‘Coastal change’ (sections 3.44 – 3.46) is the construction of causeways linking islands (an activity especially in Scotland). Causeways without adequate culverts or bridge sections block the natural flow of waters and significantly alter habitats, often to the detriment of valued species. Causeways should be mentioned.

• Does Chapter 4 set out the appropriate considerations for decision making for the marine area? Does it provide guidance on the factors to consider for specific activities in reaching decisions?

19. In Section 4.1, the bullet point “Be sensitive to any potential impacts on sites of particular significance – including sites designated in relation to environmental protection or marine heritage assets, otherwise significant in terms of environmental concerns, or of particular socioeconomic interest” needs to be more clearly written to address the point made in relation to Sections 3.18 to 3.29. There will be important (from the point-of-view of biodiversity) features in areas that are not protected. Perhaps just change ‘concerns’ to ‘sensitivity’.

20. Section 4.36 refers to ‘Issues for consideration’ in relation to shipping. Whilst the potential for shipping to introduce non-native species is acknowledged, there is
nothing in ‘Issues for consideration’. Non-native species that are introduced may become pest species adversely affecting fisheries and displacing native species or introducing disease. Consideration should be given to improving biosecurity measures and that should be mentioned in the MPS.

21. Section 4.67. The impacts from fishing are wide ranging and linked to extensive habitat degradation and severe impacts on fish communities. The wording in this section implies the possibility of impacts on vulnerable/rare fish and habitats but does not stress the more extensive nature of the impacts.

• Does the document provide an appropriate overarching framework for the development of marine plans and decision-making in the UK marine area?

22. Subject to the comments above we believe the document provides a useful overarching framework.

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