



Marine Biological Association written submission supplied for Defra Consultation on the Marine Strategy Part 1: UK Updated Assessment and Good Environmental Status. Updated assessment of progress towards achieving Good Environmental Status (GES) and proposals for new objectives, targets and indicators for the next 6 years, June 2019.

Written evidence submitted by Dr Matthew Frost, on behalf of the Marine Biological Association.

General comments

1. The Marine Biological Association (MBA) is a Learned Society established in 1884 and incorporated by Royal Charter in 2013. The MBA has about 1700 members (including international members) and runs The Laboratory in Plymouth where approximately 90 scientific staff work. MBA members have been at the forefront of providing scientific information to support marine environment protection, management and education and a great amount of scientific information that underpins decision-making about environmental protection has come from work undertaken at the Laboratory.
2. The MBA membership is made up of professional marine biologists and others who work in or have an interest in the marine environment. The members are regularly invited to provide input to consultations and on marine issues in general. The MBA therefore provides a 'clear independent voice to government' on behalf of the marine biological community. The following evidence follows this pattern in providing evidence submitted by MBA members on a number of the issues raised by this consultation.
3. The MBA has been involved in supporting much of the work including providing the lead author / editor for the HBDSEG Charting Progress 2 report that formed the basis of the biological elements of the initial assessment of GES in 2012. We have also led on the development and / or contributed key research to a number of the GES indicators. This response is therefore fairly brief and high-level as the MBA has had extensive opportunity to feed into this process over a number of years.

General

4. The MBA welcomes the intention of UK Government to continue to be “a strong and influential partner on the international stage and through OSPAR” in order “to further protect and conserve the marine environment of the North-East Atlantic”. This commitment will become particularly important when we leave the EU.
5. The MBA welcomes the ambition of UK government to continue providing assessments and updates on progress towards achieving ‘Good Environmental Status’. The MBA

Questions

Question 1: Does the UK Marine Strategy Part One provide an accurate reflection of the state of UK marine waters and the economic and social uses of those waters?

1. We are pleased to see the assessment state that for a range of descriptors (eutrophication, hydrographical conditions, contaminants and contaminants in seafood) GES has been ‘largely achieved’. It would be good however to see the assessments placed in context of other assessments (e.g. by NGOs such as the ‘State of Nature’ reports) and other scientific findings. Having been involved in being a lead on previous Charting Progress assessments, it was always disconcerting to see these ‘official assessments’ sometimes contradicted by others who used different methodologies or approaches to come to different conclusions. There are also those reports produced or funded by other government departments and DAs and which also contain statements on marine environmental status, which are also not always easy to integrate with findings in these assessments (e.g. the Go Office, Future of the Seas” Foresight project). It would be good therefore to:
 - a. better explain the context including temporal and spatial scales of reporting and how the assessments might complement or differ from other national reports or scientific findings (which often receive far more media coverage).
 - b. The “continuing policy commitment to collaborate at UK, OSPAR and at International level” explains how the GES assessments will integrate with, for example, Ospar Intermediate Assessments. Some comment is required however on how GES assessments should be read in light of other international assessments (e.g. WOA, IPCC, IUCN) as these are usually produced using separate methodologies and information and data sources.

- c. define what is meant by 'accurate reflection' and to better explain the processes in place to ensure these assessments are based on robust independent science. The Marine On-line Assessment Tool is a useful link and shows some of the useful scientific thinking and research behind the assessments.
2. The infrequent nature of the progress updates also means that the commitment to 'remain vigilant' is particularly important. The MBA would want to see a mechanism in place to provide updates on some of the assessments on an interim basis (e.g. through regular national and / or regional assessments). This will need to be considered when leaving the EU as there may be opportunities to better coordinate the various assessment reporting cycles.
3. Overall the mixed picture reflected including progress in some areas (certain marine mammals), uncertainty around other aspects (e.g. plankton, noise) and failure to achieve GES for others (e.g. benthic habitats and for most bird populations) seems a fairly accurate reflection of the state of UK waters according to our current knowledge and evidence.
4. Although this consultation is not focusing on monitoring or programmes of measures, the MBA welcomes the commitment to continuation of monitoring progress and to "implement measures to reduce the human impacts" on benthic habitats.
- ***Question 2: To what extent are the proposed new criteria and associated targets sufficient to guide progress towards achievement of GES?***
5. The MBA would agree on the predominant human pressures preventing GES being achieved as being; commercial fishing; marine litter; climate change and NIS. There is concern however that "natural phenomena such as species competition and predation" are included in this list of pressures preventing achievement of GES. Indicators and associated targets should be designed in a way that 'natural variation' and wider contextual changes (prevailing conditions) not caused by anthropogenic pressures (e.g. Climate change) should not affect GES but should result in adjustments of targets or indicator methodology. This is admittedly challenging from a scientific point of view but ultimately necessary.
6. The MBA has been involved in the process of setting targets for a number of descriptors and ecosystem components and, as such, recognises the major challenges associated with this. A general point is that it will always be difficult to set quantitative targets where; there is currently insufficient data; where more intensive data collection will continue to be prohibitively expensive. The criteria

and targets set now for components that rely on population monitoring / sampling (e.g. cetaceans, seals, fish, birds) are helpful but may not be appropriate if resources for feeding data into the indicators are no longer available. Targets currently set such as halting population declines may therefore become less useful in future so targets to achieve GES may have to be adjusted (see 7 below).

7. In the long run therefore a pressures / activity based assessment supported by the precautionary principle is likely to be more feasible and effective for many descriptors / ecosystem components.
 - ***Question 3: To what extent are the proposed operational targets sufficient to achieve GES?***
8. The operational targets are broadly helpful but it is not clear how they will be assessed.
9. The biggest weakness in operational targets is that a number of them are extremely vague. For example, the Operational Target for fish (D1, D4) states “We will work together with other countries in OSPAR to establish appropriate threshold values where this is feasible”. This is so non-committal as to be in effect, no target at all.
10. It would also be worth having further information on how the operational targets are expected to achieve GES. For example, the Operational Target for Benthic Habitats includes the statement that “We will complete a well-managed ecologically coherent MPA network”. Without specific management measures in relation to key pressures such as fishing however, there is no certainty that this target will help at all to achieve GES.
 - ***Question 4: Where gaps have been identified do you have suggestions on how these could be filled?***

No comment.