

## MARINE STEWARDSHIP REPORT - "SEAS OF CHANGE" CONSULTATION - SUMMARY RECORD OF RESPONSES

### 2.15 (1) The Government invites views on whether the components, principles, activities and mechanisms identified above are sufficient for the delivery of an ecosystem-based approach

ORGANISATION	KEY POINTS	ADDITIONAL COMMENTS
Advisory Committee On the Protection of the Sea	Broadly sufficient to deliver the approach. Calls for greater use of environmental & socio-economic assessment, full stakeholder involvement, would welcome an explicit commitment to the precautionary & prevention principles. Concerned with limited number of operational targets & milestones. A new & explicit framework for MPAs & CCAs is needed (current system too confusing). Endorse the need for an integrated approach to information gathering & subsequent assessment. Call for greater attention to be focussed on mechanisms for enforcement of regulations.	Broadly supportive of the concept & substance. Report understates current problems & proposes solutions that are insufficient. Need to address the problem that any initiatives the UK may take engage effectively with matters within EU competence or addressed in regional/international agreements/conventions. Need to improve coupling between agricultural planning and environmental protection. Question how MSR will engage with EU Thematic Strategy. Also concern that the CFP will prevent MSs from effective protection of the marine environment.
Association of British Ports	Supports development of ecosystem approach through the setting of clear objectives by which progress can be monitored. But feel delivery is unlikely without introducing new primary legislation.	Strongly support the development of a more strategic approach to marine management and better use of scientific knowledge in policy making.
British Marine Aggregate Producers Association	Welcome an ecosystem-based approach to management. Need to strategically manage the interaction between the needs of society and those of the environment.	Fully supportive of aims & objectives. Content with general direction of consultation. However, the size of the task should not be underestimated.
British Maritime Law Association		No constructive comments but have concerns about pollution from ship based sources.
British Ports Association	Support recognition that economic, social and cultural interest have an effect on marine resources but believe wording should be stronger. Reserve judgement on many policies until we can see what these mean in practice.	Agree that primary legislation should, in general, be avoided. Co-operative approach footed regionally has been shown to be more beneficial.
Council for British Archaeology	Welcome the vision of conservation and sustainable development and, in principle, the commitment to strategic management. Not sufficient for the delivery of a properly integrated approach to marine conservation as they do not incorporate the marine historic environment. Very concerned at lack of recognition of the importance of maritime cultural heritage in the main thrust of the document.	Wish to draw attention to UK's international obligations under the Council of Europe's Valletta Convention & the UNESCO Convention (not yet ratified) and the requirements for strategic environmental assessment which came into force in 2004. More holistic approach needed to fulfil SEA requirements. Must be properly investigated before it is used as the basis for it is used as the basis for applying EU EIA and SEA Directives.

<p>Council for Nature Conservation &amp; the Countryside (CNCC)</p>	<p>Precautionary approach should be employed in certain circumstances, should also be clarified and written into legislation.</p> <p>Development of RACs should go hand in hand with development of scientific systems for monitoring of marine ecosystems by ICCS.</p>	<p>CNCC welcomes HMG initiatives such as</p> <ul style="list-style-type: none"> <li>- the Irish Sea Pilot Scheme (ISPS)</li> <li>- the possibility of setting up Regional Advisory Councils (RACs)</li> </ul> <p>and the ecosystem-based approach to conservation and sustainable development.</p>
<p>Countryside Council for Wales</p>	<p>Fully endorse the key elements for delivery of an ecosystem-based approach. Essential that a more equitable balance is achieved between conservation and exploitation of the marine environment.</p>	<p>Bullet 2 - urgent need to improve monitoring and reporting aspects of SEA to ensure better use of scientific knowledge.</p> <p>Bullet 3 - Strongly support this key element. Essential need for better integration between sectoral SEAs on a regional basis &amp; to build sufficient time &amp; resources to use SEAs as a strategic planning tool. Unacceptable that activities such as fisheries and port development are exempt for the SEA Directive.</p> <p>Bullet 4 - We strongly support this but consider a clearer consents process is required.</p>
<p>CADW Welsh Historic Monuments</p>	<p>Pleased to note that a holistic approach to marine conservation is seen as important.</p> <p>A lack of survey and awareness of the richness of our historic environment off shore is a matter of real concern and inhibits effective protection.</p>	
<p>CERA (Centre for Environment &amp; Rural Affairs)</p>	<p>Agree with the principle set out in the paper. Some statements could benefit from greater clarity. Should be national overarching environmental objectives but there should also be more local objectives based and reflecting on local conditions.</p>	<p>Welcomes the publication which sets out a truly national vision. Recognises Defra has taken the agenda ahead in a positive way.</p>
<p>Chartered Institution of Water &amp; Environmental Management</p>		<p>Suggest close links with SMPs &amp; Coastline Management</p> <p>Groups that develops SMPs.</p>
<p>Cleveland Potash Limited</p>	<p>Welcomes the principle of Marine Stewardship. Ecosystem approach is broadly acceptable but the precautionary approach is too proscriptive. Would prefer to see the precautionary approach applies where it can be justified &amp; not to used as an instrument for preventing development &amp; change.</p>	
<p>Dart Estuary Environmental Management</p>	<p>Whole heartedly support the approach, components identified broadly cover the issues relevant. approach. Further work is required to define infrastructure for the delivery &amp; the scale at which this will operate. The ecosystem-based approach is "long term objective" it will be necessary to underwrite the infrastructure and "guarantee" its stability.</p>	
<p>Devon County</p>	<p>These key principles are seen as fundamental but should include</p>	<p>Pleased to see a co-ordinated approach from the Government.</p>

Council	earth science features & cultural artefacts. Should seek to establish long-term stability for the Governments vision.	Focus must not be lost in the on the transition area from marine to terrestrial environment where so much influential activity takes place.
Dorset Coast Forum	Tools & process identified are needed to deliver this approach. Limitations in lack of resources, integration and practical measures.	Action is needed now, consultation does not do enough to take forward the issues identified in the MSR.
English Heritage	Needs to be made clear that when the marine environment is referred to that it includes the marine historic environment.	Co-ordination with Agencies and Departments involved in ownership and management of marine historic environment. Regard needs to be given to international importance of UK marine heritage.
English Nature (EN)	Committed to the Stewardship process, however, consider the sum of proposed actions is insufficient and the processes are too confined to provide proper stewardship of our coasts and seas. There should be more integration and more measures to safeguard/allow recovery of biodiversity in frameworks for fisheries, renewable energy and in consent processes.  There is insufficient protection and management to deliver sustainable use and the economic benefits that accrue from exploitation must be within the viable limits of the ecosystem. Lack of urgency in taking proactive steps. The process is failing to put sufficient practical measures in place and EN remained concerned that appropriate balance between conservation and exploitation has not been achieved. Need to put in place explicit programmes to deliver exciting obligations and commitments. Concern over the length of time it is taking to discuss and trial solutions.	EN attach great importance to the development of understanding among sectoral policy/decision makers of the urgency/scale of challenges in the marine environment. New approaches have to be adopted otherwise current degraded state of our seas will continue, biodiversity will not recover and HMG's vision will not be achieved. Suggest 4 levels of ecosystem focus and principle focus' for each. Also suggest management goals, gaps in the current framework and development priorities.
Environment Agency	Fully endorses the ecosystem-biased approach & is supportive of the components, principles, activities & mechanisms identified to apply it. Anticipate new primary legislation will be needed to simplify current complexities.	To deliver the approach, environmental objectives must firstly be clearly identified & fully integrated into any development proposals consistent with the requirements of strategic environmental assessment & impact assessment.
Environmental Campaigns (ENCAMS)	It applauds the adoption of an ecosystem-based approach to the management of the marine environment and fully endorses the bullet points and goals as set out.	Approach to management must be integrated and systematic. Needs to engage stakeholder at a local level and management plans need to reflect all potential users in a sustainable way.
Environment & Heritage Services NI	Of the opinion that it will be difficult to deliver on aspirations without a change in legislation.  Concerned some strategy instruments are now outdated making it difficult to provide adequate protection in the existing frame-	Bullet 3 - amended to "more strategic management of our activities in the marine environment & land based

	work. Fundamental omission in the paper is the failure to make links with the EC WFD.	activities which impinge on the marine environment".
<b>The Federation of Scottish Aquaculture Producers</b>	Content that an ecosystem-based approach is the way to proceed.	
<b>Hartlepool Borough Council on behalf of the Association of Local Government Archaeological Officers (ALGAO)</b>	<p>Welcome this consultation paper.</p> <p>Draw particular attention to the need to ensure full integration of the marine historic environment into these procedures.</p> <p>No mention of the need to protect marine archaeological sites.</p>	<p>We welcome this document and the approach to the marine environment which permeates it, however we are concerned that the marine historic environment is not fully dealt with as a key component of marine stewardship and look to this being rectified in the future.</p>
<b>Institute of Environmental Sciences</b>		<p>Welcome the strategy &amp; consider that it is comprehensive &amp; should be, if followed through by action, of considerable benefit to the marine environment. We are particularly supportive of proposals for marine nature conservation &amp; integration with the principles of sustainable development.</p>
<b>Institute of Field Archaeologists (Marine) (IFAM)</b>	<p>IFAM welcomes vision of conservation and sustainable development of the marine environment. Pleased to see the commitment to strategic resource management based on robust knowledge and stakeholder involvement.</p>	<p>Concerned that the marine historic environment may not benefit from a move away from sectoral approach. Urgent need to increase our understanding and ability to manage the marine historic environment in line with other historic and marine environments.</p>
<b>JNCC</b>	<p>The ecosystem-based approach is a series of principles.</p> <p>Strategic goals are essential and will need to be delivered by various mechanisms which, in turn, should employ the ecosystem-based approach.</p> <p>The strategic goals for Marine Nature Conservation produced by the RMNC should form the basis for the final version of Strategic Goals for the Marine Environment. The RMNC goals have all been agreed by the Government in fora such as the 5th NSC. The delivery of an ecosystem-based approach requires a detailed understanding of how the pressures of anthropogenic activities impact on the marine environment - meaning, their cumulative effect impact on the main components of each ecosystem.</p> <p>Suggestions to amend <b>2.11 BPs</b>:</p> <ul style="list-style-type: none"> <li>-<b>BP2</b>: should include a valuation of the intrinsic elements of an ecosystem (not just economic).</li> <li>-<b>BP3</b>: including stakeholder involvement in environmental</li> </ul>	<p>Believe that the key elements identified as needed for an eco-system based approach should be treated as governments level strategic goals. The current strategic goals could then stand as the proposed approach to achieving them.</p> <p>This should be added to the definition of "ecosystem-based approach".</p>

management at a regional or local level where appropriate.

-**BP4**: "take account of" is not sufficiently robust; Policy decisions and management actions must ensure that ecosystem structures and functions, including biological diversity, are maintained/enhanced whilst accepting there should be a balance between conservation and sustainable use.

-**BP5**: and applying the precautionary principle when formulating/taking policy and management decisions when data or understanding are incomplete.

Suggestions to amend **2.12 BPs**:

-**BP3**: Assess the value of the resource as well as its status and incorporate economic incentives to stakeholders.

-**BP4**: integrated spatial planning should be a priority.

-**BP5**: there should be a strategy to address gaps in knowledge etc.

-**Additional BP**: the identification of timescales for management corresponding to the temporal scales for ecosystem processes.

Tools to assess the status of the entire ecosystem, are not presently available. An operational framework must develop ecosystem reporting tools to assess the success of management.

---

Joint Nautical  
Archaeology  
Policy Committee

The management of marine historic environment should not be limited to territorial waters.

The ecosystem-based approach should also include the effect on the 'marine historic environment' and refer to human occupation .

All proposals for integrated marine mapping should include the mapping of marine historic environment.

---

LGA Coastal  
Interest Group

Supports the ecosystem-based approach in principle & recommends the work of the RMNC & Irish Sea Pilot.

---

Marine Biological Asscn  
(MBA)

MBA welcomes the initiatives and emphasis on good stewardship. Marine ecosystems are showing significant signs of stress, mainly due to human activity.

MBA considers the *Irish Sea Pilot Project* to be thorough and imaginative.

Are keen to promote a more focussed and integrated framework for research and monitoring based on an understanding of natural processes. More research needed to identify natural changes from global anthropogenic change and generalised and localised impact.

---

Marine Conservation  
Society (MCS)

MCS generally supports the key elements/goals of the stated ecosystem approach, however, do not feel that they go far enough to properly deliver it. SEAs and EIA must focus on ecological impact. Proper funding of initiatives needs to be maintained to prevent them closing down. Marine environment has suffered for years of inadequate funding. Still not enough consideration being given to resources.

Believe the time frame to be realistic and are supportive of long term commitments rather than short term approach. No mention of education of the public, not acceptable for Government to say they have no role or policy in this aspect.

---

Marine Information  
Network (MIN)

Generally welcomes HMG's approach. Agrees that there must be a clear and concise and accepted understanding of what the ecosystem-based approach means. Not convinced that the current definition achieves this. Agree

with fundamental principle but do not consider that the listed key elements answer the question of what an ecosystem approach means in practise.

In order to implement an ecosystem-based approach the ecosystem itself must be fully understood and to achieve this HMG policy must:

- establish the means and resources to record and research the principal habitats and species;

- produce dynamic models of inter-relationships and effects for each principle marine area;

thus producing a working definition of marine ecosystems whereby human economic activity in the marine environment can be properly assessed by SEAs and EIAs.

---

**Marine Stewardship Council (MSC)**

Supports HMG's initiatives.

---

**Maritime & Coastguard Agency**

It is essential that advice is given on impact on viability of sea borne trade, which could have a detrimental effect on the environment, at an early development stage of environment.

MCA fully support the proposals made.

---

**Ministry of Defence**

There appears to be little general application of the principles listed.

It would be helpful to have some agreed clear definitions and/or advice on the practical application of the principles e.g. the use of the precautionary principle approach in the UK context.

Supports all the key elements listed for an ecosystem-based approach. However, it is important to have a clear definition of "full stakeholder involvement"

, so that all parties understand what is meant to ensure that expectations are not raised, which it might/would not be feasible to meet.

Already applying the principles of adaptive management through our conduct of environmental appraisals and environmental impact assessments. Also taking forward the requirement for wider-ranging appraisals, which address the integrated elements of sustainable development.

Regarding the development of an operational framework, the mechanisms for decisions making have potential significant implications.

---

**National Federation of Fishermen's Organisation**

General consensus that principles and objectives listed provide sound basis for future policy towards marine environment. Fully endorse the principle of the convention of a biodiversity approach;

- decentralisation of resource management

- involvement of stakeholders, notably the fishing industry

- the need to understand and manage the ecosystem in an economic context which is compatible with conservation and

sustainable development.

---

**Natural Environmental Research Council (NERC)** Welcomes identification of Defra as the lead department for marine environment issues and expects this to be beneficial in co-ordination the work of other departments and the agencies. The general components listed should be sufficient for an ecosystem-based approach although there needs to be a greater "contextual information" e.g. to define the ecosystem in question and its natural variability.

---

**Northumberland Sea Fisheries Committee (NSFC)** Are concerned that the elements listed for an ecosystem-based approach do not give enough weight to users of the marine environment, particularly fisheries. Considerable fear in the industry that their interests will be insufficiently considered.

---

**Pembrokeshire Coastal Forum (PCF)** Welcomes the emphasis that is now being given to the marine environment and the adoption of the ecosystem-based approach. However, integrating, rather than balancing activities with the needs of the marine environment should be the main aim. There should also be integration between terrestrial and marine in the regulation and management of activities.

---

**Pembrokeshire Coast National Park (on behalf of the National Park Authority)** Welcomes and supports the report, as evidence of the Governments commitment to delivering better more sustainable management of resources in the marine environment, and to full stakeholder involvement in the process.

Strongly support development for a ecosystem-based approach and concept of spatial planning. General principles and potential mechanisms appear solid but suggest it is too early for detailed comments pending the outcome of the Irish Sea Pilot Study.

---

**Port of Larne** Agree with comments made by BPA.

Commercial & economic interests must be properly taken in-  
to account when considering environmental issues.

---

**QinetiQ** Strongly supports the Governments proposed approach & would urge the Government to take a proactive lead by ensuring that the supporting scientific programme & system thinking is fully developed.

We would caution against legislation & enforcement instruments that transfer public good responsibilities to individual stakeholders who may not be ideally placed to balance them against their own economic interest & who may be expensive to administer.

---

**Some members of the former RICS Marine Resource Management and Inland Waterways Panel**

- Government's vision is laudable, but must link with existing strategic economic goals:
- Ecosystem-based approach seem appropriate but will only viable if a "clear workable environmental impact assessment methodology", goes with it. Also has to clearly relate to action integrated development policy . Also has to clearly relate to a integrated development policy. Repeat does not address the issues of UNLCOS agreements, IMO resolutions, freedom to navigate etc. or explain how implementation is to be policed;

Agree with key elements but needs to tackle appropriate training. Feels that the report is biased towards fisheries and this needs

- Governments approach is still sectorised rather than integrated, as it should be;

to be changed to include environmental sustainable employment and technology.

---

Colin Reid

Pressing need to improve relationship between the fishing industry and the scientific advisers contributing to fisheries policy. Lack of trust and confidence between the two groups who should be working together.  
Improving this relationship is at least as important as improving the scientific data itself.

---

Royal Town Planning Institute (RTPI)

MSR and consultation process is welcomed.  
Concern that the framework is not geared to a more integrated approach to the effects of offshore development or to regulating or mitigating its environmental impacts. Rapid and large-scale development of oil/gas infrastructure, ports, fish farming. If targets for renewable energy are to be met, then, without strict planning/management, the marine and coastal environments could be significantly damaged.  
Elements and framework suggested for an ecosystem approach offer some prospect of control but this must be expanded and a farseeing framework must be developed.

---

RSPB (UK/HQ)

Agrees with the implementation of an ecosystem-based approach but it is important to establish clear and accepted terminology be used.  
It agrees with the key elements and goals listed.  
Believes that an ecosystem-based approach will include:  
- setting environmental objectives and targets;  
- setting environmental indicators;  
- adopting a precautionary approach with EIAs and SEAs;  
- protecting food webs;  
protecting critical habitats;  
- building a robust scientific base through research of eco-systems and the affect of anthropological activities on them;  
- introducing multi-species management;  
- conserving biodiversity;  
Not clear whether devolved administrations have given the same commitment to consider possible new legislation, as has been made by the English Administration.

This supports the view that HMG initiatives should be integrated!  
Current approach to marine conservation is not proactive enough. Some of the drives are also moving too slowly e.g. MEHRAs still not in place 10 years after the Braer incident.  
Disappointed that many of the commitments made are not new initiatives.  
Would like to see more new targets with timetables with "ring-fenced" resources.  
Agrees that current legislation, if properly enforced, would alleviate many problems; but does see new legislation being necessary:  
- to implement marine spatial planning,  
- to provide sufficient resource for SFCs to carry out their environmental obligations to ensure  
- all decision makers have a duty of care for the marine environment; control off shore renewable  
- development beyond 12 nautical miles, and  
- for nationally important marine wildlife sites  
- Want to see greater commitment to integrated management of the marine environment through devolved administrations  
and also across departments.

Scottish Coastal Forum

SOC outlines the basis but needs to establish the details and hierarchy of objectives. Robust criteria needed for terms such as

Welcome the MSR initiative & is particularly pleased that the initial MSR has been followed up with SoC.

"greater and better" "use".

There is an element of starting the process & reviewing the component principles, activities & mechanisms in light of experience. Fundamental to success will be defining "sustainable development" in a marine context.

Agree that a clear and concise understanding of what it means in practise is critical . Also need to establish the relationship between marine stewardship concept and ICZM.

---

Scottish Environment LINK Publication of MSR was welcomed, however,

Marine Task Force

disappointed that little new action was proposed.

(SEL/MTF)

Welcome ecosystem-based approach and generally agree with bullet points and what has already initiated. Spatial planning needs further consideration for the comprehensive management of the marine environment on a regional scale. Work should build on that already undertaken by the Irish Sea Pilot. Agrees that precautionary approach is necessary. Believer that this should be described in legislation to allow a standardised approach.

**ALSO SUBMITTED BY RSPB Scotland**

Think that the elements for an ecosystem approach should include a specific mention of establishing links with stakeholders to make use of their local knowledge, expertise and working practices.

---

Scottish Environment Protection Agency

(SEPA)

Fully supports a sustainable and holistic approach to the management of (Scotland's) coasts and the promotion of ICZM. SEPA welcomes the Marine Stewardship programme and supports the ecosystem-based approach.

Agrees that a clear understanding of what marine stewardship means in reality is critical, especially for those expecting to deliver it.

---

Scottish Natural Heritage

(SNH)

SNH welcomes: the marine stewardship process, the production of strategic goals; and clarification of an "ecosystem-based approach" to their delivery. However ,considers that the consultation confuses the relationship between the production of strategic goals and ecosystem-based principles and the difference between principles and practice The ecosystem-based approach describes the scientific principles which should underpin delivery of strategic goals for the marine environment. Also need to clarify whether coastal waters are counted as marine areas. The Msr vision refers to oceans and seas' whilst the current review of development refer to 'coastal and marine waters'. Most of what is as key elements and ecosystem approach framework is about delivery rather than key principles and where the lists do contain principles they relate to strategic objectives rather than to an ecosystem-based approach. Strategic principles should set out the parameters for constraining or facilitating the achievement of strategic goals.

Key Principles could be:

- The biological productivity of ecosystems has natural limits:  
*"Harvesting of wild populations needs to take place within their natural capacity. Fisheries have to be managed with long term objectives which acknowledge biological limit points"*
- The ability of ecosystems to break down organic and inorganic materials also has natural limits.  
*"The amount and location of waste discharged to the marine environment needs to take account of rates of natural break-down, as well as impacts upon human health, ecosystem services and other valued species"*
- Ecosystems consist of different species living in close proximity.  
*"Wild harvesting has to be managed in ways which take account of incidental bycatch and effects upon non-target species and habitats"*
- Ecosystems consist of populations and communities linked through predator-prey and other ecological interactions:

*"Activities affecting one component of an ecosystem affects*

*others in turn"*

- Certain locations with a species range are of greater significance than others, either as essential habitat or for

particular parts of the life cycle:

*"Special areas require appropriate protection and management"*

- Species normally occur within a natural range:  
*"Movement of a species beyond its natural range should only be permitted following an assessment of the ecological risks"*

---

Solway Firth

The proposals do not directly take into account non-marine forces upon the ecosystem, neither is it stated how the ecosystem approach will deal with local authority & national boundaries. Agree there is a need to define what the ecosystem approach "means in practice". Without a commitment to developing a framework for marine management which includes discussion on governance, how can the ecosystem approach be implemented at a local level. Needs to identify a lead authority who is empowered to undertake the necessary data gathering, research, analysis & policy development. This authority will also need to have a firm legal status in terms of spatial planning & policing marine & coastal activities.

Partnership

Can an ecosystem approach this realistically be achieved through the segregation of terrestrial, marine & coastal management?

---

Strangford Lough (SLMC)

SLMC broadly welcomes the proposals contained in the *Seas of Change*.  
Should now address issues/problems rather than just identify them. There is a need for positive action.

Need to ensure that terms such as " sustainable development" are clearly understood. Bottom line has to be that the fundamental resource is protected. Must not be seen as a trade of between economic gain and the environment with the result that the environment will gradually be depleted.

---

Trinity House Lighthouse Service (THLS)

UK has gone a long way in clearing up coastal waters but adjoining countries could do more. Need to be able to maintain the authority to make hazard, wrecks and navigation channels to minimise the risk of shipping casualties and the possible devastating effects this could have on the marine environment. Need to be able to continue this work even in environmentally sensitive areas as it is a statutory obligation.

---

UK Climate Impacts Programme (UKCIP)

Considers the implementation of an ecosystem-based approach to be particularly valuable in reconciling conservation goals with the full range of demands made on the marine environment to meet economic, social and cultural needs. Feels that for this approach to be successful it must acknowledge the potential impacts of climate change in order to support adaptive management and planning.

Support, acknowledgement of ecosystem process being non-linear and that outcomes may display time lay.

---

Wash Estuary Strategy

MSR is a excellent initiative and fully support the Governments

If new legislation is necessary and this results in new duties for

<b>Group (WESG)</b>	<p>vision. Agrees that a national strategy working towards a cleaner, healthier, safer, productive and diverse sea backed by Central Government is essential.</p> <p>Primary legislation should not be pushed through until and unless the complexities of the marine and coastal environments are better understood, but if seen to be necessary, then enactment should be swift:</p> <p>Precautionary approach should be adopted throughout the marine environment including legislation associates with the renewable energy industry.</p> <p>Wholeheartedly agrees with the ecosystem-based approach and sees the general principles set out as adequate</p>	<p>local authorities/relevant bodies, Government should ensure that support and resources are available to carry them out.</p>
---------------------	--	--

---

<b>Wildlife &amp; Countryside LINK Marine Task Force (WCL/MTF) &amp; Wildlife Trusts &amp; WWF (WT&amp;WWF)</b>	<p>WCL/MTF welcome ecosystem-based approach and generally agree with bullet points and what HMG has already initiated:-</p> <ul style="list-style-type: none"> <li>- the Irish Sea Pilot Scheme (ISPS)</li> <li>- the possibility of setting up Regional Advisory Councils (RACs)</li> <li>- the extension of the Habitats &amp; Birds Directives (H&amp;BDs)</li> <li>- consultation on: <ul style="list-style-type: none"> <li>Offshore Renewable Energy (ORE)</li> <li>EU Strategic Environmental Assessment Directive (EAD)</li> <li>Review of Development in Coastal and Marine waters (RofD)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- impact limited by time and funding!</li> <li>- This will not help conserve the Darwin Mounds!</li> </ul>
---	---	---

---

**2.15 (2) The Government invites views on how these might be further developed and applied in practice to quickly translate an ecosystem-based approach to marine management into an operational process**

<b>Advisory Committee On the Protection of the Sea</b>	<p>Call for a much stronger framework of policy, legislation &amp; institutions. Do not believe the approach outlined in the MSR will deliver sustainable development in the UK's coasts &amp; seas.</p>	<p>Calls for a radical rethinking of the whole framework for the management of the marine environment. Consider primary legislation as inevitable if the current deficiencies are to be tackled in a sustainable manner.</p>
--	--	--

---

<b>Associated British Ports</b>	<p>Necessary to develop clear objectives supported by quantified targets against which progress can be measured.</p>	
---------------------------------	--	--

---

<b>British Marine Aggregate Producers Association</b>	<p>Number of elements that could assist are: A dedicated office with sufficient funding &amp; expertise; targeted yet comprehensive stakeholder involvement &amp; a very clear Government policy lead.</p>	<p>Important that the integrated approach works for all stakeholders.</p>
---	--	---

---

<b>British Ports Association</b>	<p>Lack of data has created major problem problems and resulted in precautionary principle being over used. Incomplete knowledge and understanding of nature of ecosystems deserves more attention and greater investment in research.</p>	
----------------------------------	--	--

---

<b>CADW Welsh Historic Monuments</b>	<p>Would welcome further recognition of the need for co-operative survey ventures and research programmes with nature conservation , so that historic environment conservation can be seen as a full partner in the processes.</p>	
--	--	--

---

Cardiff University	The development of a regional management approach will be critical in linking overall sea use management to an ecosystem approach, especially in the crucial area of fisheries management (2.6 & 2.15).	
CERA (Centre for Environment & Rural Affairs)	Need to ensure that sufficient cognisance of issues are integrated into the policies, plans etc. Within 12 mile limit management needs to be more closely aligned with regional and local economics, spatial & environmental planning.	Insufficient links between those stakeholders with a social and economic focus and those where focus is environmental.
Chartered Institution of Water & Environmental Management	Important that adequate weight is given to social & economic aspects of sustainable development as well as the environmental aspects & flood & coastal defence are vital parts of this.	
Council for British Archaeology	Clear identification of Ministers in devolved administrations with responsibility for the marine environment and a duty on all government bodies to protect the marine environment and human health whilst promoting good stewardship of marine resources.	
Council for Nature Conservation & the Countryside (CNCC)	CNCC considers the Irish Sea Pilot too short to deliver a full set of solutions but should highlight future necessary action; recommends EQOs for both estuarine and inshore as these impact upon marine environment.	Planning process for both inshore and offshore development must be seen to be inclusive and must allow the primary of an ecosystem approach and the development of spatial planning. Overarching framework urgently needed to restructure and streamline current sectoral approach to marine management. All sectors and all developments should be covered under one piece of new UK primary legislation that sets out the framework for ecosystem-based management. This should be over seen
Countryside Council Wales	UK should build upon principles developing as part of the EU marine strategy initiative. Must involve the management & regulation of fishing. Strongly support the development of an operational framework and an ecosystem-based approach to fisheries on a regional basis. Proactive approach needed to enforcing conditions attached to consents/licences and setting thresholds for action.	Welcome the urgency that is assigned to this process better learning from EIAs & monitoring & making better use of this decision making will be important for delivering key elements.
Dart Estuary Environmental Management	Consideration should be given to the establishment of cross sectoral mechanisms of governance. Scale of resources that been available to marine policy are disappointing	
Devon County Council	The basic pathway identified is supported. The framework will need to function at a variety of scales and will need to be monitored.	Fundamental will be a transparent process of consensus building followed by empowerment of the target body. Need to ensure that existing knowledge is available and missing information can be obtained.

<b>English Heritage</b>	<p>Recommends that there is a clear identification of Ministers in each of the DA with responsibility for the marine environment.</p>	<p>There should be a duty on all Government bodies to protect &amp; promote the good stewardship of the marine resources. Need robust guidelines to protect the marine historic environment from competing needs and uses. Systems of regulations and consents procedures are made more transparent in regard to licence applications.</p>
<b>English Nature (EN)</b>	<p>Needs to reflect the outcomes of the EU Marine Thematic strategy in the Stewardship process, as part of developing an overall practical and fully integrated cross-sectoral framework against which to plan a UK strategy. Introduce as a priority specific work programmes, currently missing, which are integral to an ecosystem-based approach and which are currently missing.</p>	<p>EN's response refers to an attachment being a draft of a paper intended to be tables at RMNC.</p>
<b>Environment Agency</b>	<p>Pragmatic approach needed. Application of the Water Framework Directive should make a significant contribution.</p> <p>A clear process is required to ensure that the recommendations of EIA/SEA are implemented. Working groups need to be set up to assess current state, established targets and develop a management regime and a mechanism is needed to translate this into a work programme.</p>	<p>The resourcing of monitoring programmes and any corrective actions will be important implementing the strategy. Suggest trail implementation to turn strategy into practice at both regional and local scales using existing studies/plans as a base.</p>
<b>Environment &amp; Heritage Services NI</b>	<p>EcoQOs need to be developed further. Seems to be lack of awareness of substantive work that is currently being undertaken in this area.</p>	<p>MPMMG are in the forefront of developing further indicators of ecological quality to meet WFD requirements. This type of work needs support from DEFRA &amp; Agencies involved.</p>
<b>Environmental Campaigns (ENCAMS)</b>	<p>Clear need for further dialogue between tourist industry, conservationists and beach managers at national, regional and local level.</p>	
<b>The Federation of Scottish Aquaculture Producers</b>	<p>Future development of these activities must include: a commitment to efficiency and consistency across the initiative, in order to make the best use of stakeholders resources; it must contain a firm science-based approach to measure socio-economic benefits in relation to environmental footprint.</p>	
<b>ForeSight Marine Panel (FSMP)</b>	<p>We suggest that consideration be given to establishing within each coastal zone a hub or single point of contact for all issues concerned with the marine environment regardless of topic (see response for details).</p> <p>The National Park concept is currently being extended to new areas of UK to raise the profile of environmental management and protection in the local government of these areas. There is</p>	

scope for an equivalent concept in the coastal zones of the UK and in many ways the fragile environment makes the need more pressing. Put forward consideration the idea of one or more Marine National Parks.

---

Institute of Field Archaeologists (Marine) (IFAM)

IFAM proposes:

- undertaking studies aimed at increasing strategic understanding of the marine historic environment and the threats to it.
- the increase of archaeological input into the management of the marine zone;
- sufficient people with the technical skills and knowledge to undertake the tasks to ensure the proper management of the MHE;
- recognition of the international importance of the UK MHE

---

JNCC

JNCC considers the components in 2.12 to be a good starting point, the list of delivery approaches needs to be amalgamated with the proposed strategic goals and developed further.

---

Supports the suggestions made by Scottish Natural Heritage in their response.

---

Joint Nautical Archaeology Policy Committee

Need better funding for nautical archaeology and improved legislation. Urgent that extensive underwater surveys are conducted to discover the extent of the UKs under water heritage.

---

Marine Biological Asscn (MBA)

Support for development of the UK National Biodiversity Network information resource should continue. More effort needed in accessing and interpreting marine data and for information gap-fill through targeted surveys to provide valid data. The application of assessment criteria for marine natural heritage importance needs clear quantitative guidance. Consideration should be given to strengthen the provisions of the 1981 *Wildlife & Countryside Act* rather than introduce new legislation (Marine Nature Reserves).

---

Need to monitor health of the environment to establish cause and effect relationships. A lot of valuable baseline information is already in place and support is needed to continue collection of key reference sites. A system of 'stop-orders' is needed to protect new industry developments while legislation is being considered. No new industry or technique should be allowed to comment before impacts have been considered.

---

Marine Conservation Society (MCS)

- development of spatial planning and management for the marine environment.

Considers more funding needed specially for surveys and research to fill the current gaps in legislation. Detailed habitat mapping and species' surveys and assessment of long term dependencies required to underpin ecosystem approach.

Consideration should be given to whether Marine Agency and a Marine Act are needed, as well as dedicated Ministers in each Devolved Administration responsible for the marine environment.

---

Strategic management needs closure integration of government departments and an acceptance by those with primarily economic interests that a healthy marine environment also a value.

Marine Spatial Planning is a key tool for delivery of an integrated and long term approach provided the plan covers all sectors and users.

Issue of enforcement will also be key to delivery of some objectives. Currently penalties are not sufficient to reflect the severity of the offence.

More funds needed for marine biological science,

Fully supports the application of SEAs to all marine projects, plans, and policies. Should include cumulative and combined in parts from different sectors. Need to address the fundamental problem of the fisheries sector being exempt from this process.

- need the identification of boundaries of marine ecosystems from regional seas to estuaries.

closure of  
NERC is believed to have been a serious mistake. Long term research programme needed, which should include mapping and monitoring of marine biodiversity and dissemination of information. Results of research need to be more easily accessible to those who need it.  
- ODPM's interpretation of the land use planning SEA should not be considered as a guide for marine SEAs. Separate and specific guidance for marine SEAs is essential;  
- need for HMG to seriously consider impact of policies on the environment before adoption.

**Marine Information Network (MIN)**

Defra should establish a Marine Conservancy Council charged with the specific duty of delivering an ecosystem -based approach as a working tool for marine management.

Principal areas of economic activity in the marine environment must be identified and the nature of the activities clearly defined to properly assess impact to enable a proper plan for sustainable development to be drawn up. Perpetrators should be held legally accountable for adverse impact of activity on the marine environment. A policy of zero emissions of toxic materials should be established for UK waters.

A range of indicators must be established to monitor/measure the health of the marine environment.

A comprehensive system of marine conservation areas must be established whose criteria is based on good science of both habitat and species.

**Ministry of Defence**

It is imperative that any policy, legislation, strategy or initiative arising from the consultation takes account of disparities between England and the devolved administrations and can apply, in effect, across all areas of the UK. Legislation and/or initiatives should be the same throughout the administration in order for it to be applied practicably, in particular where such legislation or initiatives may have an impact on MOD.

It is difficult to see how much spatial planning could be applied and implemented in practice. MOD's view is that further wide-ranging assessment and discussion of the implications of the spatial planning to the marine environment is required.

**National Federation of Fishermen's Organisation**

"Urgent need to underpin conservation initiatives with short term government finance for the fishing industry during the recovery period. Principle should be to rebuild stocks and then

apply measures that will protect them from unsustainable exploitation. Short term financial support is a pre-condition for the practical realisation for this".

---

**Natural Environmental Research Council (NERC)** Need to place greater emphasis on the development of tools of implementation. Ecosystem-based management is a major departure from past practice and the management tools used previously cannot be expected to be sufficient for this new approach. New tools need to be developed if the approach is not to be seriously undermined.

Key policy principles of an ecosystem-based approach are: the sustainable development, an integrated management approach, robust science plus tools that reveal how processes interact and provide an holistic picture, precautionary principle and stakeholder involvement.

As there are few who combine socio-economic and science new types of training should be devised to span these disciplines.

A serious issue that needs to be addressed is the problem of taking research activities into a operational phase. Data streams required from global and regional observing systems can only be provided by large investments in infrastructure but the findings of marine observing is very problematic.

These principles must be supported by the new management tools and should be backed up by state of the art modelling capability.

The approach also implies an operational means of data collection to deliver systematic streams of data over sustainable periods. The availability of data is also a issue and the audience of marine data collection at public expense should be encouraged to ensure benefits of investment are maximised.

Social economic aspects must be balanced by science and that science must be of good quality, research is need to determine this e.g. we may not know enough about the science of ecosystem function to be able to apply the precautionary principle effectively.

Spatial planning and integrated mapping are useful for the ecosystem based approach but should not be used in isolation as they can only provide a static picture and could lead to misjudged management decisions

---

**Pembrokeshire Coastal Forum (PCF)** Needs to be integration between terrestrial and marine particularly with the advent.

---

**Pembrokeshire Coast National Park** Encourage the development of spatial planning to be fully integrated with emerging national, regional and local ICZM strategies. Coherent linkages between land use planning in the coastal environment and hinterland and marine resource management will be an important key to developing and implementing ICZM policies and strategies.

Examples of best practice elsewhere in the world, and changes should be considered not limited to "tweaking" the sectoral, ad-hoc approach that currently pertains. Should be willing to consider the merits of some of the bolder, innovative approaches to the management and conservation of marine resources that have been adopted elsewhere.

---

**QinetiQ** One area not fully explored in SoC relates to vulnerability of the marine environment to intentional threats, such as those relating to terrorism.

Would be useful, in the current geopolitical climate, to include a statement on how marine environmental concerns will (or should) be included in the development of the UK strategy relating to Critical Infrastructures.

Harmonisation, co-operation, collaboration and

consensus is needed at an international level. This should extent to highly focussed joint research which should be undertaken as public good activity.

---

**Colin Reid** Having more scientists on fishing vessels or speaking to skippers as they unload may not be the most efficient way of gathering data, but if such steps build mutual respect between the two groups, then the benefits of that will far outweigh the costs of any inefficiency.

---

**Some members of the former RICS Marine Resource Management and Inland Waterways Panel** Better skills are needed when communicating with the business sector. People need to be developed to deliver to a range of stakeholders at all levels. Economic modelling of local economics that are dependant on marine resources should be taken into account when deciding ecosystem boundaries.

---

Incorporation of spatial planning mechanisms needs to be fully considered given current problems in recruiting professionals with an appropriate skill base.

**Royal Town Planning Institute (RTPI)** Major deficiency is the need for a adequate mechanism for the planning and regulation of offshore development. This is limited under the Town and Country Planning Acts which legislates to low water mark and not beyond.

---

October 2002 raised concern over lack of effective spatial planning framework with SERAD for the marine environment. Concerns are still valid. While voluntary guidelines have been drawn up in some areas there is a lack of statutory provisions for integrated spatial planning.

---

**RSPB (UK/HQ)** Changes to governance that would facilitate and support an ecosystem-based approach include:

- stakeholder management;
- integrated management;
- management on an appropriate scale - regional+coastal zone;
- long term management commitment;

incentives (including financial) to encourage ecosystem-based management practices.

The priority is an Action Plan to research, develop and implement an ecosystem-based approach. The ideal basis is marine spatial planning together with reformed duties and powers for competent authorities which would provide a coherent planning and consenting framework. Special measures needed as part of this, including:

- wider seas measures to cater for dispersed species;
- implementation of marine protected areas;
- strictly protected nationally important marine wildlife areas.

Targets need to be set but the example of EcoQOs at OSPAR show the need to avoid these becoming bogged down in discussion.

---

**Scottish Coastal Forum** Appreciate need to clarify the difference between Marine Stewardship and ICZM when so many of the broad goals and actions appear to be the same.

---

Scottish Envmt LINK  
Marine Task Force  
(SEL/MTF)

Considers that Government should identify/appoint a Minister in each of the devolved administrations with responsibility for the Marine Environment: Consider where a Marine Agency/Department is needed to deliver management and conservation policies. New, overarching legislation should be encompassed in a Marine Act: Establish Marine Spatial Planning and management of developments, users and conservation for each regional sea or other appropriate ecosystem.

**ALSO SUBMITTED BY RSPB Scotland**

Scottish Environment  
Protection Agency  
(SEPA)

Legislation to consolidate marine development regulations should be considered. The initiatives presently under way may throw a better view on the areas where legislative change would be the most effective solution.

Scottish Natural Heritage  
(SNH)

Believe that the delivery of the eco-system approach is done through delivery of strategic goals. Important to complement these goals through specific targeted objectives and activities that set out the mechanisms for delivery within clearly defined timescales and responsibilities. Some of this will be achieved through ICZM but there is a need to draw initiatives together. Current document does not clarify how the next steps will take place or how stakeholders will be engaged.

**Next Steps' will probably include:**

- Quality and quantity assessments of marine natural resource;
- Information gathering on functioning and dynamics for each ecosystem;
- Identification of carrying capacities, limits of change, areas of uncertainty, and thresholds for the application of the precautionary principle and the defining of areas where recovery measures are required;
- Developing aims and integrated management objectives for each ecosystem involving multi-sectoral stakeholders;
- Agreeing and implementing:
  - legislation/policy changes
  - appropriating required technical skills
  - enforcement measures
  - spatial planning systems
  - emergency contingency plans
  - stakeholder involvement/awareness measures
  - monitoring with pressure and state indicators with feedback to management.

Solway Firth  
Partnership

The Government appears to be confusing marine management & ICZM. The Government has not indicated how the two separate issues of the MSR process & ICZM national strategy are to be combined, in terms of practical delivery at the local, regional & national levels.

There is little mention of coastal zone management in the discussion of the ecosystem approach or in the strategic goals.

Strangford Lough  
(SLMC)

Little evidence of integrated management on the ground. Would be helpful if implementation could be progressed as part of ICZM.

UK Climate Impacts  
Programme (UKCIP)

A more robust approach would include consideration of potential climate change adaptation measures and incorporate these into marine management and planning.

**Wash Estuary Strategy Group (WESG)** Data being gathered or already held in SEAs and EIA should be collated into a single database to aid understanding of spatial and temporal distribution of natural resources. This could further the identification of areas of high environmental sensitivity. The creation of a dedicated task force between Govt.Depts. may speed up the process and would ensure that all Depts. were equally informed and would provide a single point for information for those outside Government.

---

**Wildlife & Countryside LINK Marine Task Force (WCL/MTF) & Wildlife Trusts & WWF** WCL/MTF considers that HMG should identify/appoint a Minister in each of the devolved administrations with responsibility for the Marine Environment; whether delivery of integrated planning management and conservation should be the province of a new Marine Agency or even a Marine Department; there should be new, overarching legislation encompassed in a Marine Act; there should be Marine Spatial Planning and management of developments, users and conservation for each regional sea or other appropriate ecosystem. WCL/MTF requirements include:-

- the ISPS highlighting future necessary action;
- RACs should be set up with authority to "manage";
- extension of H&BDs is overdue and urgently needed;
- use emergency measures under Common Fisheries Policy for environmental protection;
- to implement article 12.4 of the Habitats Directive (to fulfil commitment to reduce "bycatch" levels);
- to legislate to protect environment from effects of ORE and introduce comprehensive planning regulations;
- expedite the establishment of MEHRAs.

---

## 2.20 (3) The Government invites views on these strategic goals for the marine environment

<b>Advisory Committee On the Protection of the Sea</b>	Goals are generic & encompass an appropriate overall vision.	Suggest modification of goal 4 to include reference to social and economic development to link it to a wider issue of sustainable development in the country.
<b>ARUN District Council</b>	Benefits are inherently contradictory. Should say "replace environmentally unsustainable employment with environmentally sustainable employment".	Suggests additional goals to include prevention of further deterioration of the marine environment and maintaining marine environment as a high priority on the Government's agendas.
<b>Associated British Ports</b>	Support the overall goals. Feel "environmentally sensitive" should be removed from point 2 & "environmentally" from point 3, feels that sustainable development already encompasses environmental aspects.	
<b>British Marine Aggregate Producers Association</b>	Essential that the strategic goals encompass a much wider field than just nature conservation.	Care needs to be taken to ensure duplication of work is avoided.

<b>British Ports Association</b>	Very much support these strategic goals.	
<b>CADW Welsh Historic Monuments</b>	Welcome the inclusion of the cultural marine heritage within parameters of RMNC Working Group and the increase understanding of our cultural marine heritage as one of it's goals.	
<b>CERA (Centre for Environment &amp; Rural Affairs)</b>	Welcomes these goals. Concerns on the interpretation of words, need for meaning to be unambiguous	
<b>Cleveland Potash Limited</b>	The strategic goals are admirable and need to be implemented in a meaningful way.	
<b>Council for British Archaeology</b>	Welcome the strategic goals but these need to be extended to include the marine historic environment.	Should include: the use of marine historic environment in a sustainable and archaeologically sensitive manner. Increase our understanding of and foster the education and social benefits to be gained from the marine historic environment.
<b>Council for Nature Conservation &amp; the Countryside (CNCC)</b>	CNCC agrees with these strategic goals and preamble CNCC would prefer <b>goal 2</b> to read "To use marine resources in a sustainable and ecologically sensitive manner in order to retain natural ecosystems whilst achieving environmental, social and economic benefit from the marine environment".	
<b>Countryside Council Wales</b>	Agree that strategic goals fro MNC must be clearly & fully integrated into the broader strategic goals for the marine environment aimed at achieving sustainable development.	Detailed comments on bullet 1- this could be built upon to include reference to an ultimate goal e.g. natural state of the marine environment. Bullet 5 - strongly support the goal to promote awareness, understanding & appreciation of the marine environment, however, a major initiative & funding is needed.
<b>Dart Estuary Environmental Management</b>	Additional gaol for consideration would be to encompass the concept of "safe oceans" expressed as a "reduction of risk".	This would include the development of risk assessment methodology.
<b>Devon County Council</b>	All goals are supported with the exception of the second. Consideration should be given to adding a goal to halt & turn around the decline in diversity & integrity of marine habitats, natural communities & species.	2nd goal could benefit from some rewording to make it clear that exploitation should not be to the detriment of the natural environment. Goals should also make reference to the use of the precautionary principle.
<b>Dorset Coast Forum</b>	Goals are cleared and focussed but there is no indication of how these will be carried forward or any clear time frame.	
<b>English Heritage</b>	Welcomes the inclusion of the cultural marine heritage in the strategic goals. There is a great need for strategic research frameworks to be developed for the UK.	More information needed if we are to manage our marine heritage effectively.

English Nature (EN)	There is a need to adopt a single set of principles on which goals for the marine environment/conservation can be implemented. These are outlined in the output from the EU Marine Strategy in Denmark. Further iteration is now needed to produce a final integrated set of goals and supporting measures.	EN refer to their paper tabled at RMNC on strategic goals.
Environment Agency	Endorse these high level strategic goals.	Goal 4 could include 'to understand the pressure on the environment & the interaction between them.
Environmental Campaigns (ENCAMS)	ENCAMS is able to contribute to the achievement of the strategic goals outlined.	
Environment & Heritage Services NI	Suggest a further strategic goal "To understand the land - sea interactions within catchment & wider sea areas to further inform management decisions on a catchment based approach".	
Federation of Scottish Aquaculture Producers	Strategic goals are good.	
Hartlepool Borough Council on behalf of the Association of Local Government Archaeological Officers (ALGAO)	The absence of references to the marine historic environment continues throughout the document and is not clear if this is being considered. Specific mention of the need to develop archaeological approaches should be included in the strategic goals.	
Institute of Field Archaeologists (Marine) (IFAM)	IFAM understands HMG's desire to move from sector-based approach to marine management to one of cross-cutting issues, but feels that UK's cultural marine heritage has not been fully understood or managed and may be harmed by this approach. UK waters are rich in marine history and is unique but least managed being under constant threat and degradation from natural and human activity.	UK marine historic environment is under funded and lack of research means lack of info upon which decisions should be based.
JNCC	The Strategic Goals need to be more prominent and numbered for ease of reference. The balance of goals tends towards exploitation rather than restoration and conservation and this should be redressed.  Generally applauds the presentation of the Strategic Goals but considers they should be closer to those presented to the RMNC.	If the goals remain more or less as stated then recommends the following changes: <b>BP1:</b> "To conserve and <b>restore to a desired state</b> the overall quality of our seas". "Conserve and enhance" suggests there if nothing wrong with the <i>status quo</i> . <b>BP2:</b> Insert "environmentally" before "sustainable" and "long term" after "maximum". Also <b>BP2</b> should be split into <i>renewable</i> and <i>non-renewable</i> resources as the latter cannot be sustainably exploited but need to be used in a <i>wise and environmentally sensitive manner</i> . <b>BP3</b> could be worded: "To promote environmentally sustainable

use of natural marine resources to ensure long term economic benefits and employment". To avoid confusion over use of terms  
BP4: recommend rewording as follows:  
"understanding of the  
**full economic value** of the marine environment processes and our cultural marine....."

---

**Joint Nautical Archaeology Policy Committee (JNAPC)** Pleased to see that the importance of cultural marine heritage has been recognised in the strategic goals.  
However disappointed that this was practically the only reference in the report. It is very important that the marine historic environment is explicitly included at an early stage as it is a non-renewable resource and once destroyed it will have gone for ever.

---

**Marine Biological Asscn (MBA)** **2.19**  
- **BP3**: Agreed, but precautionary approach to ensure proper regulation is in place prior to "take off". "Stop orders" should be before a new industry or technique commences.

---

**Marine Conservation Society (MCS)** MCS supports further development of these strategic goals.  
There is a need for rewording for some;

Should not imply it has an objective to "enhance the marine environment"  
**bp1** could read "To conserve or restore natural processes and marine diversity, and improve the overall quality of our seas"  
**bp2** should not imply that it will always be possible to derive maximum benefits from continued use but should read:  
"To use marine resources in a sustainable and ecologically sensitive manner in order to retain natural ecosystems whilst achieving environmental, social and economic benefit from the marine environment."

---

**Marine Information Network (MIN)** see response to Q1

---

**Marine Stewardship Council (MSC)** Solutions in the form of market incentives should be highlighted as one of the means by which the goal of sustainable use of marine resources can be achieved.

---

**Ministry of Defence** Supports the strategic goals and statement of the approach listed.

---

**Natural Environmental Research Council (NERC)** The goals are appropriate. "Fostering a joined up approach to marine policy within Government" should be an explicit goal.

---

**Pembrokeshire Coastal Forum (PCF)** Specific mention of integration between marine and terrestrial could be made.

---

Pembrokeshire Coast National Park	Support the five goals for the marine environment, although it is difficult (at this early stage) to envisage how they will be achieved without substantial reform. Need to develop clear and transparent mechanisms for assessing and conflict resolution between different sectoral interests and demands, which should be done within clearly defined parameters of ecological and economic sustainability. More work required on the interactions between human activities and natural process in the marine environment, and their consequences and risks to the marine environment.	
Some members of the former RICS Marine Resource Management and Inland Waterways Panel	Strategic goals appear to be based on "common sense".	- the goals should be linked/referred to other/existing strategies;
RSPB (UK/HQ)	Suggests that the following goals should be added: - "To establish an integrated and ecosystem-based approach to marine management and regulation", as there is currently no specific reference to this in the strategic goals listed. - "To create a unifying marine planning system to manage the demands of existing and proposed activities in the marine environment". This would provide a base for much of the actions taken. Need to make it clear that Economic Strategic goals are only goals if they are compatible with a healthy marine environment.	
Scottish Coastal Forum	Appropriateness of goals and actions will be determined by the process of future review of their implementation. Clear indicators will be needed, especially for the actions to access progress. To aid this clear definitions are needed. The indicators in use here could make a good basis for an annual report of progress.	
Scottish Envmt LINK Marine Task Force (SEL/MTF)	Suggest that bullet point about use of marine resources is changed to "To use more resources in a sustainable and ecologically sensitive manner in order to retain natural ecosystems whilst achieving environmental, social and economic benefit from the marine environment".	
Scottish Environment Protection Agency (SEPA)	Hard to fault goals and actions but are very general in nature. Is possible to see where current statutory remits might have a part to play or may be affected by change in policy that are necessary to achieve these goals.	
Scottish Natural Heritage (SNH)	Strategic goals should be listed before the ecosystem principles as they comprise the overall vision. Good to mention the need to safeguard the 'health' of the natural environment. Can see the advantage of explicit reference to the life-support role of the sea and the 'environmental services' it	

delivers.

Welcome "multiple benefits" message. But the idea of "harvesting renewable resources within their carrying capacity" should have been explicit. Would have preferred "environmentally" rather than "ecologically" and "optimum" rather than "maximum".

"To promote goal regarding economic benefits should be rewritten to say sustainable use of marine resources so that economic benefits can be obtained through environmentally sustainable employment"

Maybe aspirational to say "seek active public participation in development of new policies" but no harm in its inclusion, although "valuing" would be better than "appreciating".

Would be useful to clarify that traditional methods of marine management have been too narrow in focus. The intention of integrated management means "decisions about development need to co-ordinate delivery of different objectives and involve a range of stakeholders".

**Significantly** there is no goal on how *non*-renewable resources should be used wisely, sparingly and efficiently.

---

**Solway Firth Partnership** 1) To develop an appropriate framework for managing the marine & coastal environments which rationalises & simplifies existing mechanism & brings marine & coastal management in line with management practices. 2) To integrate the ecosystem approach of the marine & coastal environment with similar approaches to terrestrial management.

---

**United Kingdom Hydrographic Office (UKHO)** Unless Government commits to a sensible programme of hydrographic survey of UK seas, then much of the work defined in the MSR could be rendered meaningless. Further goal: "Government sponsored survey programme to cover national waters and that benefits all. Current programme based on SOLAS and Defence will take over 2000 years to complete.

---

**Wash Estuary Strategy Group (WESG)** Agree with strategic goals set out in paper they are already incorporated into WESG management plan (WEMP). This plan is now undergoing a wide ranging review to bring the full range of stakeholder into the process.

Achieving strategic goals would be made more efficient and effective were Government to provide some core support via technical training and financial support.

---

**Wildlife & Countryside LINK Marine Task Force (WCL/MTF) & Wildlife Trusts & WWF** WCL/MTF agrees with these strategic goals and preamble

WCL/MTF would prefer:  
- **goal 2** to read "To achieve environmental, social and economic benefits from marine resources in a sustainable and ecologically sensitive manner, operating within the carrying capacity of natural ecosystems and ensuring that habitats and species are protected. Where marine habitats and species have been

---

depleted or lost due to man's activities and/or poor management in the past, all efforts should be made to enhance and restore them."

---

## 2.22 (4) The Government invites views on this supporting approach to its proposed strategic goals and objectives for the marine environment

<b>Advisory Committee On the Protection of the Sea</b>	Principles are generic & logical, if not comprehensive.	Serious reservations on bullet points 6 & 7. Suggest adding reference to the precautionary principle to bullet 6 and a reference to interdisciplinary expertise in bullet 7. Also suggest an additional statement in support of targeting research to existing uncertainties that inhibit scientifically informed decision making.
<b>Arun District Council</b>	Reference to precautionary principle needed to bullet on basing decisions on a clear understanding of natural processes.	
<b>Associated British Ports</b>	Supports the approach.	
<b>British Marine Aggregate Producers Association</b>	Co-ordinating approach by the Government would be greatly appreciated. Cautionary note on the 6th bullet point - huge knowledge known of own subjects but an overall & co-ordinated understanding is lacking.	Extreme application of the precautionary principle would be detrimental to stated objective.
<b>British Ports Association</b>	Welcome reconciliation but statements such as "competing needs & uses of the environment" beg many questions.	
<b>CADW Welsh Historic Monuments</b>	Document appears to pay little real regard to historic environment conservation.	
<b>Cardiff University</b>	The need to improve our expertise & capabilities in ocean-related biological & management science, technology & engineering should be underlined.	
<b>CERA (Centre for Environment &amp; Rural Affairs)</b>	Agree need to link regional & local Agencies into process.	Innovative approaches needed to public participation, needed to recognise the role of incentives as well as regulations and voluntary action.
<b>Council for British Archaeology</b>	Framework currently far too narrow in outlook to achieve the overall integrated approach. Feel Defra should revisit the whole issue to consider how fully multi-disciplinary approach can be developed.	Need to ensure that cultural marine heritage is given the appropriate weight and is properly protected and co-ordinated through all relevant agencies and Departments.
<b>Council for Nature Conservation &amp; the Countryside (CNCC)</b>	Suggest an alternative set of objectives including: -make regulatory systems more transparent and reduce failures in implementation. -ensure a fair and effective balance between regulation and voluntary initiatives.	

-Ensure all government Departments and other stakeholders base their decisions on a clear understanding of natural processes in the marine and coastal environment.  
 -reconcile and accommodate competing needs and uses.  
 Also claim there is an urgent need for legislation and management to cover the UKEEZ.

Countryside Council for Wales	The approach must also be based upon the precautionary principle including risk assessment as a tool for managing uncertainty. Central to delivery of strategic goals will be the development of targeted and clear objectives with clearly defined timescales. No detail as to how there are to be produced and agreed upon.	Welcome the development of a clear statement & the approach being adopted by the Government. Bullet 6 - this principle should also refer to the marine environment so that it complements the 4th proposed strategic goal.
Devon County Council	Agrees with the supporting approach being taken.	6th point should be accompanied by a commitment to base decisions on a clear understanding of the ecosystem.
Dorset Coast Forum	Need for better integration between the general goals & specific MNC goals.	
English Heritage	Welcomes the co-ordination of the Governments activities with it's agencies to enable streamlined mechanisms for regulation.	
Environment Agency	Supporting framework is comprehensive.	A transparent and understood mechanism for the policy process and regulatory system is entitled to balance the requirements of different stakeholders.
Environment & Heritage Service NI	Support the approach & point out this is inline with WFD obligations.	Considerable amount of resource required to co-ordinate agencies & DAs - lack of resources is where some of the difficulties lie at present.
Federation of Scottish Aquaculture Producers	Acknowledges the supporting approach which the Government can take.	Encouraged to see an acceptance of a fair balance between regulatory & voluntary initiatives. Good industry codes can achieve the same delivery in a much more effective way.
Institute of Field Archaeologists (Marine) (IFAM)	no specific comment	
JNCC	A clear Government statement is welcomed. Integrated Strategic Goals, beneath the high level goals, need to be developed by involving stakeholders and relevant sectors, these would be followed by objectives, indicators, targets and limits, then the tools and outcomes necessary to achieve the objectives. Caution that decisions relating to management of the marine	Bullets need to include mention of the precautionary principle, co-ordination and improvement of marine data availability, development of more targeted and integrated goals and objectives for all sectors (e.g. from EIAs and exploratory and monitoring studies carried out by individual organisations etc).

environment should not wait until there is a "clear understanding of natural processes". A precautionary approach must be advocated.

---

**Joint Nautical Archaeology Policy Committee** The RMNC Working Group should coordinate its activities with English Heritage and the heritage agencies of the devolved administrations, and MoD (2.23).

---

**Marine Conservation Society (MCS)** MCS supports the further development of targeted goals and these could be taken forward to the next phase by RMNC Working Group and that objectives for marine nature conservation should incorporate goals for marine management But in from other Government Departments and stakeholder needs to be sought at an early stage in order to develop the next level of goals.

---

**Marine Information Network (MIN)** see response to Q1

---

**Marine Stewardship Council (MSC)** Government should encourage market-based incentives alongside regulations allowing consumers to influence both fisheries and regulators. Suggest an additional statement is supported of the strategic goals along lines of: "Encouraging and supporting the use of market-based incentives, such as eco-labelling that encourage the pursuit of sustainable development of marine resources".

Food and Agricultural Organisation has acknowledged that certification programmes and the benefits they bring using market incentives such as eco-labels.

---

**Ministry of Defence** How will need for new or consolidated legislation be addressed in developing the practical application for the ecosystem-based approach? How can this be reconciled and/or unified to ensure that any legislation developed and introduced in support of the ecosystem approach is not limited in it's effectiveness?

---

**Natural Environmental Research Council (NERC)** **2.21: BP7** This might usefully address:  
- Closer alignment of strategic and research policy priorities  
- there should be closer collaboration between CEFAS and other institutions (NERC) to improve quality and accelerate research in some fields.

---

**Pembrokeshire Coastal Forum (PCF)** Broadly welcome supporting approach, particularly the involvement of stakeholders.  
The words "reconcile" and "accommodate" are used, but essentially these mean "integration". Would be clearer and more positive if their term were used.

---

**Some members of the former RICS Marine Resource Management and Inland Waterways** Agrees that using a supporting approach is beneficial.  
Full consideration should be given to alternative sources of knowledge. Will take great effort to ensure transparency and need to identify a single point of contact for information

Panel communication . Will also apply to co-ordination with agencies and devolved administrations.

---

RSPB (UK/HQ) Welcomes the strategic goals the challenge is in ensuring they lead by action. Would like to see specific actions identified to state how objectives will be delivered. Indicators needed to measure success. Current list is a starting point for a more detailed plan of action. No commitment, timeframe or process currently identified to actually develop actions.

Need to make clear that goals should not be detrimental to the needs of a healthy marine environment.

Would like to see a commitment that if voluntary initiatives are seen to have failed or not to work, then regulation must be applied. Would also like to see a specific statement that if a clear understanding of natural processes does not exist, then the precautionary approach must be used.

---

Scottish Envmt LINK  
Marine Task Force  
(SEL/MTF)

Would replace suggested bullets with:  
Government should consider who could provide a actual focus and take a lead for:

- co-ordination of marine and coastal activities
- reconciling competing needs and uses
- making systems more transparent and reducing failures in implementation
- involving stakeholders in development of new proposals
- ensuring balance between regulation and voluntary initiatives
- ensuring all Government Departments base decisions on clear understanding of natural processes
- improving Government expertise and capacities in science technicality and engineering
- ensuring all Government Departments have regard to international importance of marine environment and related legal obligation.

Believe a new Agency/department is required to achieve this.

Urgent need for Government to provide comprehensive legislation and management of UK EEZ.

**ALSO SUBMITTED BY RSPB Scotland**

Scottish Environment  
Protection Agency  
(SEPA)

Agrees with the supporting approach but, again, very general in nature.

---

Scottish Natural Heritage  
(SNH)

Delivery should involve a wide range of policy approaches and should be integrated with the delivery of the ecosystem approach. Policy approaches should include:

- Integrated approaches to policy should be adopted to put the environment at their centre and co-ordinate the activities between Government, agencies and the devolved administrations to deliver this.
- More efficient use should be made of marine resources and adopt spatial management and prevent habitat damage.

This involves using best-available technologies and the

Support public education on how individual purchasing decisions affect the marine environment.

protection of essential habitats (spawning, nursery and feeding); use technical conservation measures more extensively to increase selective use of fishing gear to limit bycatch, reduce of damage to seabed and non-target species. Unavoidable non-target bycatch should be used not discarded.

- Move towards regulation regimes which promote compliance and reward and foster the values of good stewardship.
- Redirect fisheries' incentives towards sustainability; promote the restoration of fish stocks to levels of optimum yield; support responsible fishing in sensitive marine areas; reduce bycatch; increase understanding ecosystem functioning; and promote participative management.
- Safeguard ecosystem integrity; build on scientific base and modelling and develop more focused and co-ordinated research and monitoring framework; understanding of ecosystem functioning including interlinkages, interdependencies, dynamism and biological limits.
- Seek effective involvement of stakeholders; bring decision making closer to affected areas and involve local stakeholders.
- Make more effective use of environmental, socio-economic and sustainability assessments.
- '- Apply precautionary principle where there appears to be high risk or where impact of activity cannot be properly assessed and adopt adaptive management.

There should be a logical sequence and hierarchy for the process to ensure that the limits of the ecosystem are those which define the bounds of human activities.

---

**Wash Estuary Strategy Group (WESG)** Agrees with the approach adopted. Would like to emphasise the request for core funding and a dedicated marine task force within Government.

---

**Wildlife & Countryside LINK Marine Task Force (WCL/MTF) & Wildlife Trusts & WWF** WCL/MTF see the need for:-

- an integrated approach to necessary legislation and the provision of a structure for future regulatory requirements;
- an "overarching framework" for management of the marine environment;
- more "consultations/workshops/discussions" with HMG;
- consideration to be given for a central focus group to lead on the attainment of the goals (a Marine Authority?)
- need for spatial planning and regional management (RACs);
- "precautionary approach" is necessary, but should be clearly defined in legislation
- more HMG resources/finance;
- provide comprehensive legislation and management for UK's Exclusive Economic Zone

---

### **3.8 (5) The Government invites views on whether stakeholders feel that they are fully consulted and kept up-to-date on developments in coastal and marine policy**

<b>Advisory Committee On the Protection of the Sea</b>	Currently difficult to focus attention on development due to the number of groups & mechanisms.	High level of public concern for the state of marine environment but poor communication of developments, especially in EU policy.
<b>Associated British Ports</b>	Co-ordination needs to be improved to avoid 'consultation fatigue'.	Consultation must be seen to lead somewhere.
<b>British Marine Aggregate Producers Association</b>	Feels kept reasonably well informed. Concern not all correct stakeholders are involved. Database of key stakeholders & areas of interest would be helpful.	
<b>CADW Welsh Historic Monuments</b>	Welcomes the stated intention to involve agencies and stakeholders within regulation processes affecting marine environment. Promotion of public awareness of such issues is also to be welcomed, as is the intention to achieve a balance between competing interests.	Important that those concerned with the protection of the historic environment should have a proper voice during development of regulations.
<b>CERA (Centre for Environment &amp; Rural Affairs)</b>	Concern some stakeholders not engaged need to work with stakeholders to address this issue. Defra are making rapid progress in informing & consulting with those involved.	
<b>Cleveland Potash Limited</b>	Feel current consultation circles are too restrictive & would benefit from wider involvement from industry with a coastal impact/interest. Significant stakeholders have been ignored.	Urges stakeholder involvement to include this company as an active member of any new stakeholder group or part in any other consultation process. Output of research projects funded by government money should be made more publicly available.
<b>Council for British Archaeology</b>	Overall believe there is thorough stakeholder involvement on matters concerning the underwater cultural heritage.	Would like to see a more concerted effort to develop much better integration of natural & cultural conservation.
<b>Council for Nature Conservation &amp; the Countryside (CNCC)</b>	Welcomes Government efforts to involve stakeholders. Government should give stakeholders every encouragement to share responsibility for management of the natural resources of the seas and coasts.	Links should be established with stakeholders to tap local knowledge, expertise and practices, which can contribute to the delivery of objectives and recovery of ecosystems.
<b>Countryside Council for Wales</b>	Suggest that certain marine & coastal stakeholders such as those with cultural & tourism interests could be better engaged. A website maybe a suitable tool to keep stakeholders up to date with developments.	So many different initiatives that it is difficult to maintain an overview of relevant information relating to the marine environment. Suggest the marine stewardship initiative is well placed to consolidate such information into a single source.
<b>Dart Estuary Environmental Management</b>	Consultation on coastal development has, historically, been weak and has been far removed from participatory governance. Present indicators are of an improvement in consultation.	

Devon County Council	A much wider participative process is needed to ensure success. Need to ensure that "consultation" does not replace "participation".	
Dorset Coast Forum	Not really. Better approach may be to hold coastal forums around the country with regional representatives feeding back to Government.	
English Heritage	Feels it is kept up to date on developments in coastal & marine policy.	
English Nature (EN)	Developments in the stewardship process, have seen improvement in co-ordination and the involvement of stakeholders but further improvement should be considered. Stakeholders currently find difficulty in achieving a comprehensive overview of developments in coastal and marine policy. Need for a central dissemination point within Government to provide information and focus stakeholder involvement. Could be achieved by a UK Marine Stewardship website which would also cover work of RMNC and devolved administration.	
Environment Agency	Generally well informed of policy developments in coastal waters relating to its regulatory interest but not so well informed about wide marine policies where is not formally consulted.	
Environment & Heritage Service NI	Welcomes the proposed mechanisms for consultation.	It is our experience stakeholders are best informed through local forums.
Environmental Campaigns (ENCAMS)	Happy that there has been dialogue with stakeholders and communication with a whole range of beach users. Clearly a need to support this with a public awareness campaign and market research.	
The Federation of Scottish Aquaculture Producers		Request that it's details are forwarded to the responsible parties for all the initiatives which are described, so that industry can be reassured that it is being fully consulted & briefed.
ForeSight Marine Panel (FSMP)	Welcomes the MSR and the consultation document. The large number of bodies being consulted underlines the fragmentation in responsibilities and interests throughout the UK's marine environment. The challenge is to co-ordinate these responsibilities to achieve value from future information and issues, and to provide guidance for the development of capabilities and initiatives in the future - can access to information be simplified?	
Institute of Environmental Sciences	Insufficient time to respond properly as a result of Defra lists not being comprehensive.	

JNCC	JNCC welcomes full stakeholder participation. Supports the MSR reports and initiatives as useful in consolidating information from disparate sources. A UK Marine Stewardship website containing summary initiatives and timescales with extensive links to other sources of information would be valuable and be an efficient way of raising stakeholder awareness. Fishing Groups should be added to the list of consultees and there should be a forum with the goal of addressing the effects of the entire fishing industry on the marine ecosystem.	
Joint Nautical Archaeology Policy Committee	We do not feel that we have properly consulted. The apparent lack of emphasis on the marine historic environment in the consultation paper indicates that there could be more contact with archaeological bodies in future.	Should clearly be recognition of the work carried out by the JNAPC.
Marine Biological Asscn (MBA)	More effort needs to be put into accessing and making available all sources of marine survey information. Would support development of the UK National Biodiversity Network. Basic need for more support for libraries willing to use as data repositories where storage, cataloguing and care require funding.	
Marine Conservation Society (MCS)	MCS welcomes efforts to involve stakeholders but would suggest the most effective method of communicating events would be by way of a Newsletter by e-mail. Is becoming increasingly difficult for 'smaller business to keep track of the large number of initiatives, meetings and consultations.	
Marine Information Network (MIN)	MIN has only recently been established and cannot comment constructively on past consultations.	
Marine Stewardship Council (MSC)	Generally supports approach outlined and agrees that stakeholder consultation should be held regularly and in "face-to-face" meetings if possible to encourage feedback.	
Ministry of Defence	MOD acknowledges and welcomes that it has been fully consulted and kept informed regarding developments in marine and coastal policy - and wishes to remain so.	
Natural Environmental Research Council (NERC)	Generally feel up to date with developments in marine policy. NERC consider the MSR as a major step forward and would wish this to continue.	<b><u>ANNEX 1 OF THE RESPONSE IS CONFIDENTIAL</u></b>
Northumberland Sea Fisheries Committee (NSFC)	Stakeholders are not sufficiently involved, and even if their views are invited, little regard is paid to them.	
Pembrokeshire Coastal Forum (PCF)	Welcome prominence given to stakeholder involvement.	
Pembrokeshire Coast	Acknowledges Governments commitment.	

## National Park

---

<b>QinetiQ</b>	<p>If stakeholders are to fully understand the information available then improvements may be needed in the way complex data &amp; diverse concepts are assimilated &amp; presented while maintaining clarity of relevance to published objectives.</p>	
<b>Some members of the former RICS Marine Resource Management and Inland Waterways Panel</b>	<p>Welcome the philosophy and efforts made in consultation but do not consider full consultation to be taking place yet. New approach needed since level of interest across communities as a whole remains low. More consideration needed on how to engage outside of NGOs. Also need to consider how NGO views are formed and who they're really representing.</p>	<p>Need to consider whether landowners, apart from the Crown Estate, are actively involved. Also need for greater transparency to landowners &amp; businesses and must widen industry involvement.</p>
<b>RSPB (UK/HQ)</b>	<p>Broadly happy with level of consultation. Would like to see more demonstration of how consultees' view have/have not been acted upon and publication of the reasoning behind decisions. To date this process has not been transparent. Minutes of all IDGs should be on the internet and their availability should be publicised.</p>	
<b>Scottish Coastal Forum</b>	<p>The concept of "partnership working" is endorsed through stakeholder involvement but the document is silent on how this type of process will be resourced. This will be a major issue as the ICZM Recommendation is implemented. Use of term "full stakeholder engagement" can raise expectations. Detailed and reasoned decisions will be required to maintain stakeholder dialogue and confidence.</p>	<p>Important that organisations feel recognised as stakeholders, for this a comprehensive list of consultees at the end of a consultation paper is important. SoC consultee list is particularly short of Scottish stakeholders.</p>
<b>Scottish Envmt LINK Marine Task Force (SEL/MTF)</b>	<p>Welcome efforts to involve stakeholders. Government should give every encouragement to stakeholders to join in development of a vision and encourage wide ownerships and sharing of responsibility for management of our coasts and seas.</p>	
<b>Scottish Natural Heritage (SNH)</b>	<p>Decision-making in the marine environment needs a better process for engagement with coastal communities and other marine users. There is a need for regular reports and updates. It can be more readily achieved through websites. Policy changes should be open for comment. Conferences are useful for a general update but the format is not conducive to debate or stakeholder engagement.</p>	<p>At present consultations tend to involve just the 'usual suspects'. Forthcoming reports and subsequent proposed policy changes must be open to comment.</p>
<b>Solway Firth Partnership</b>	<p>The current level of engagement has been adequate. The Government should be making a commitment towards actively engaging local fora directly.</p>	<p>There is no need to organise all of the events in London, particularly considering the financial status of many local fora.</p>

Strangford Lough (SLMC)	<p>Omissions from stakeholders/consultees list:</p> <ul style="list-style-type: none"> <li>- SLMC</li> <li>- NI Department of Agriculture and Rural Development</li> <li>- NI Fish Producers Association</li> <li>- Maritime Coastguard Agency</li> <li>- Ulster Farmers Union</li> <li>- NI Agricultural Producers Organisation</li> <li>- Council for Nature Conservation &amp; the Countryside</li> <li>- Commissioners for Irish Lights and</li> <li>- the Lough Agency.</li> </ul>	<p>Notes that to date no main workshops or conferences have taken place in Northern Ireland. Suggests that a major ICM event is held there in 2004/5 to raise the profile and facilitate NI involvement in their process.</p> <p>CNCC have responded</p>
----------------------------	---	--

UK Climate Impacts Programme (UKCIP)	<p>Feels that it has been kept up-to-date on developments in coastal and marine policy and has been able to contribute views.</p>	
--------------------------------------	---	--

Wash Estuary Strategy Group (WESG)	<p>Hard to see how local bodies would find out about consultations without certain stakeholder passing news on to them. Local Authorities' Heads of Planning and Development should be copied in on all consultations that impact on their duties. Suggest it may improve efficiency and effectiveness to send more than one copy of each consultation to large stakeholder partnerships. Consultations should also include glossaries to aid non-expert respondees. Core findings and resourcing of partnerships would also help to ability to respond.</p>	
------------------------------------	--	--

Wildlife & Countryside LINK Marine Task Force (WCL/MTF) & Wildlife Trusts & WWF	<p>WCL/MTF welcome HMG's efforts to involve stakeholders.</p>	<p><b>Para2.12 - Bullet Point 5:</b> links should be established with stakeholders to tap local knowledge, expertise and practices for delivery and recovery</p>
---	---	--

### 3.13 (6) The Government invites views on its proposal to replace the English Coastal Forum with a new expert group to provide advice on the development of the national strategy for ICZM in England

Advisory Committee On the Protection of the Sea	<p>Agree that the time has come to replace the group but oppose to the traditional concept of "Blue Ribbon" expert groups appointed centrally.</p>	<p>Stakeholders and Government should agree membership in unison. Size should not exceed 10 participants.</p>
---	--	---

ARUN District Council	<p>A positive way forward but a sound reporting process for dissemination of information by Defra is essential.</p>	
-----------------------	---	--

Associated British Ports	<p>Further consideration needs to be given to how this fits into the Water Framework Directive re: RBMPs &amp; ICZM to avoid overlap.</p>	
--------------------------	---	--

British Marine Aggregate Producers Association	<p>Overarching need for policy style group to advise on ICZM. Group should possess sufficient expertise to integrate needs.</p>	<p>Sectoral interests should not fall by the wayside.</p>
--	---	---

British Ports Association	<p>Support in principle the setting up of a replacement Coastal</p>	<p>Need a better balance between environmental interests and</p>
---------------------------	---	--

	<p>Forum with a small number of recognised ICZM practitioners. Support is conditional on the balance within the group being fair and proportionate.</p>	<p>other interests. Should not duplicate work of RMNC and activities should be given reviewed every 2 years.</p>
<p><b>CERA</b> (Centre for Environment &amp; Rural Affairs)</p>	<p>Supports the establishment of a new expert group but are concerned about balance of the group, need to ensure that economic and community/social issues are properly represented.</p>	
<p><b>Chartered Institution of Water &amp; Environmental Management</b></p>	<p>Concerned about how the composition of the new informal group to replace ECF would be determined.</p>	<p>Important that adequate weight is given to social and economic aspects of sustainable development, food and coastal defence are vital to this.</p>
<p><b>Council for British Archaeology</b></p>	<p>New expert group must include representation from DCMS, EH, &amp; NGOs with expertise in &amp; responsibilities for the marine cultural heritage through JNAPC.</p>	<p>Accept a single UK body would be cumbersome but suggest that the desirability for such to be established to advise the devolved administrations should be considered.</p>
<p><b>Council for Nature Conservation &amp; the Countryside (CNCC)</b></p>	<p>An "Expert Group" should be set up along the lines achieved by ICZM to allow easy access by stakeholders to a wide range of expertise.</p>	<p>Should also be a network of formal regional coastal groups that can advise on regional development and conservation matter.</p>
<p><b>Dart Estuary Environmental Management</b></p>	<p>Not recommended that ECF is scrapped or totally abandoned failures have often been a result of a lack of defined roles and absence of a properly funded secretariat. It is however, neither an appropriate or effective mechanism for the development of a national strategy for ICZM in England and therefore support a new expert group but not as a replacement to ECF.</p>	<p>ICZM expert group should number no more than 12 members and should operate as an ad-hoc committee to address a specific need (a natural strategy). Size of English coast requires a proportionately larger participative mechanism than a small panel of experts.</p>
<p><b>Devon County Council</b></p>	<p>Concept of replacing the Forum is of concern.</p>	<p>There is a danger that the constitution of any new group could skew its recommendations. Possible that a number of regional forums could contribute to an agglomerated forum for the English coast.</p>
<p><b>Dorset Coast Forum</b></p>	<p>Need to ask why ECF had no clear focus &amp; ensure this is not repeated. Membership of the new group will need to cover a range of specialist areas.</p>	
<p><b>English Nature (EN)</b></p>	<p>This can only be successful if it has a clear role and has long-term commitment and support from Government. It is hoped that such a group will address governance issues under the marine Stewardship process as part of its work on ICZM and review its remit against the overall framework to implement the ecosystem-based approach.</p>	
<p><b>Environment Agency</b></p>	<p>Agrees that EFC should not be retained. New expert group is supported but selection of experts &amp; balance should be</p>	<p>Needs to have a clear mechanism for communication from this group to all stakeholder interests to avoid duplication . Should</p>

	carefully considered. Should be kept as small as practicable.	be task orientated, finite in timescale and have specific goals.
<b>Environment &amp; Heritage Services NI</b>	Would prefer to see a network of local forums under a nationally co-ordinated remit rather than an informal expert group.	Stakeholders need to feel they have taken part in the decision making process.
<b>Environmental Campaigns (ENCAMS)</b>	Happy to sit on any expert group if appropriate.	
<b>Hartlepool Borough Council on behalf of the Association of Local Government Archaeological Officers (ALGAO)</b>	Regard it essential there is appropriate heritage representation on any new expert group, perhaps through English Heritage.	
<b>JNCC</b>	JNCC supports UK co-ordination of ICZM strategy developed by a Defra-led Steering Group. Consideration should be given to the reason for the demise of the English Coastal Forum and the possibility of reviving it using the Scottish and Welsh versions as models.	
<b>Joint Nautical Archaeology Policy Committee</b>	We recommend that the sounding board (3.11) should include representatives of the heritage agencies and MoD.	
<b>LGA Coastal Interest Group</b>	Considers there may be a role for English Coastal Forum in the future.	Any expert group should be independently chaired and able to set it's own agenda and provide truly independent advice.
<b>Marine Conservation Society (MCS)</b>	Regional Coastal Fora need to be established in England and a national coastal forum is needed in NI to complement the Scottish and Welsh bodies.	<p>Accept there may be a need for a new expert group but local and key stakeholders must still be consulted. Regional Coastal For a are essential to consider issue and information policy makers of the impact of their decisions will have on coastal ecosystems.</p> <p><b>CZM initiatives:</b></p> <ul style="list-style-type: none"> <li>- concerned no national support for local estuary partnerships and CZM initiatives; decisions on how to fund/support these must be made now before they are forced to close down due to lack of funds.</li> <li>- development of sub-regional marine plans;</li> <li>- extension of LA authority from LWM to "bay enclosing line";</li> <li>- making CZM strategies statutory by adoption within Local Development Frameworks</li> </ul> <p>- importance of the skills base</p>
<b>Marine Information Network (MIN)</b>	As the new expert group, if formed, would have no decision-making role in implementing policy, consultation on a wide but	

focussed basis is essential to delivering advice etc. It should be broadly based and inclusive to ensure that the views of all pertinent bodies are properly represented.

---

**Maritime and Coastguard Agency** All stakeholder groups should have representation from the maritime sector to ensure a rounded view is obtained.

---

**Ministry of Defence** MOD agrees with the proposal to replace English Coastal Forum with a new expert group. However, the establishment of such a group must not detract from wider consultations, so that specific stakeholders, including MOD, have the opportunity to discuss their position/opinions and are fully represented on policy development and all relevant issues.

Committed to, and will continue to develop, consultation and stakeholder involvement in MOD activities. However, it must also be borne in mind that there are many MOD activities where consultation is unlikely to be conducted.

---

**Natural Environmental Research Council (NERC)** NERC has no strong view on this proposal but the coastal fora in Scotland and Wales have been more successful than their english counterpart. NERC is willing to participate in the work of any expert group as it is UK wide and has considerable expertise.

---

**Pembrokeshire Coastal Forum (PCF)** Find this proposal unfortunate as Wales and Scotland have Coastal Fora. The groups from the 4 UK countries could together provide UK view from stakeholders, which could "feed issues up through the system".

---

**Some members of the former RICS Marine Resource Management and Inland Waterways Panel** UoP are not convinced that a new expert group will be sufficiently populated by a diverse range of representatives outside the usual NGO groups; Concerned about non-elected advisory group; and how the term expert is defined.

Given these concerns would also like to know how these experts will be appointed and how objectively will be maintained. Acknowledge that representing all stakeholders is difficult but feel that certain groups with interest or expertise are rarely involved.

---

**RSPB (UK/HQ)** Agrees that ECF has "run out of steam". Does need to be replaced by something but calling it an experts group may give out the wrong signal. New group should be open and transparent; membership should be small and have direct influence on policy and legislature. Should act as an sounding board for government initiatives. Membership should be by appointment and should include all major stakeholder groups. May also need to be a number of regional fora to link into other new initiatives, regional governance, RACs/CFP and implementation of ICZM.

---

**Scottish Envmt LINK Marine Task Force (SEL/MTF)** An "Expert Group" should be set up for ICZM Need to ensure that stakeholders have a gateway into this group so that it can benefit from their local expertise and examples.

**ALSO SUBMITTED BY RSPB Scotland** Expert group should have suitable mechanisms for disseminating information to wider stakeholders who have been kept informed by English Forum.

---

<b>Scottish Natural Heritage (SNH)</b>	Does not disagree to formation of an expert group on ICZM. Even with an expert group there may be a need for a wider group of stakeholders. Given the existence of Scottish and Welsh For a it would be unfortunate to have no equivalent English body.	
<b>Solway Firth Partnership</b>	If the ECF is to be replaced then there needs to be an alternative mechanism for engaging with local for a & providing a central focus point. The most appropriate option in terms of effective engagement would be to support regional coastal fora and co-ordinate these through an ECF. This would give the local fora relevant platform for discussing local issues and a link into national strategy. An expert group will not provide the same function as a national forum. It is not the best option for ICZM & developing national policies which reflect local priorities, this will require a much more independent & transparent organisation which is based upon the same principles as the local fora.	
<b>Strangford Lough (SLMC)</b>	DOENI is committed to establishing NI Coastal Forum in 2003/4. When established need to be fully involved in future work.	
<b>United Kingdom Hydrographic Office (UKHO)</b>	Existing Marine Geospatial Data Working Group comprising BGS, JNCC, EA, DNSOM and Crown Estates, should be broadened and given a formal role under the MSR initiative.	
<b>Wash Estuary Strategy Group (WESG)</b>	Support an expert ICZM group but not at the expense of excluding stakeholders. If group is in association with written consultations and workshops, and the Government takes on board what is said in these as well as by the group itself, then it seems acceptable.  There should be a probationary period to see if system works/ and a preliminary list of experts should be circulated to all stakeholders for comment/agreement.	
<b>Wildlife &amp; Countryside LINK Marine Task Force (WCL/MTF) &amp; Wildlife Trusts &amp; WWF</b>	an "Expert Group" should be set up along the lines achieved by ICZM to allow easy access by stakeholders to a wide range of expertise.	WCL/MTF imply that the English Coastal Forum should not be replaced, but should continue and act as an interface between the Stakeholders, the Expert Group and HMG.

### **3.13 (7) The Government invites views on its proposal that there should not be a new wider, overarching stakeholder body**

<b>Advisory Committee On the Protection of the Sea</b>	Disagree with the Governments proposal but advocate a tiered strategy enabling stakeholder involvement at all levels.	
<b>Associated British Ports</b>	Co-ordination needs to be improved rather than establishing another group.	

<b>British Marine Aggregate Producers Association</b>	If Government feels that achieve the objectives through targeted stakeholder consultation then approach is welcomed. Broader stakeholder body should not be ruled out entirely unless Government can clearly identify each stakeholders' areas of interest on a cross sectoral basis.	
<b>Cardiff University</b>	Support proposals outlined in 3.11 & 3.12.	Overall UK group may not be necessary. High level of co-ordination with devolved administration is needed.
<b>Council for British Archaeology</b>	Do not accept the existing fora are adequate for dealing with all current issues.	
<b>CERA (Centre for Environment &amp; Rural Affairs)</b>	UK stakeholder group not needed but should be established at regional level to integrate with local/regional government agencies.	Still a role for annual national stakeholder events to share experiences and good practice.
<b>Dart Estuary Environmental Management</b>	No need for a overarching group but there is a role for a revitalised EFC.	
<b>Environment Agency</b>	Agree an overarching stakeholder body is not required but there is a need for a clear process for resolving conflicts at the national scale.	More effective communication needs to be fostered at all levels to ensure sufficient stakeholder engagement.
<b>Environment &amp; Heritage Service NI</b>	Wider overarching group is not appropriate.	Stakeholders more concerned about local issues.
<b>The Federation of Scottish Aquaculture Producers</b>	Opposed to a pan-UK stakeholder body. This would add more cost & would be counter-productive.	Delivery of objectives is being met in a focussed way, by devolved and regional means.
<b>JNCC</b>	JNCC supports this. The Marine Forum could be given greater prominence and fulfil the role of a UK stakeholder body on all marine and coastal issues.	
<b>Marine Conservation Society (MCS)</b>	Wider, overarching stakeholder body may be inappropriate, but would support the formation of a Steering Group to bring together relevant marine and coastal policy development; the Inter-Departmental Working Group does not fulfil this function but it could form the basis of the membership of the Steering Group.	Steering group would develop full set of targeted goals and actions to deliver Defra's vision. A body to provide on going direction and advice is vital to maintain momentum and avoid duplication or loss of communication between different sectors. Membership should include all relevant Government Departments and should represent the range of stakeholder interests.
<b>Marine Stewardship Council (MSC)</b>	Does not see the need for a larger body as the views of stakeholders can be taken into account in more focussed smaller groups where everyone's view points can be heard.	
<b>Natural Environmental Research Council (NERC)</b>	A wider overarching stakeholder body might make a real impact in the co-ordination of marine affairs, if it were kept focussed.	

The establishment of several for a indicates that there is a need for greater co-ordination.

---

**Northumberland Sea Fisheries Committee (NSFC)** Consider this to be a good idea in principle but are sceptical about how this body will deal with the individual views of stakeholders. Need to ensure that stakeholders at all levels are properly communicated with to ensure they feel involved.

---

**Pembrokeshire Coastal Forum (PCF)** Consider it unfortunate that this is being dismissed for England.

---

**Pembrokeshire Coast National Park** Endorse view that a new, overarching stakeholder body is not needed. Government should recognise and support local and regional fora which will play a crucial role in achieving full stakeholder involvement. Government is also encouraged to consider a series of regionally based MSR workshops for stakeholders, perhaps on a Regional seas basis.

---

**Some members of the former RICS Marine Resource Management and Inland Waterways Panel** Will be partly determined by the outcome of the eventual structure".

---

**Colin Reid** There is a danger of proliferation of groups, fora, partnerships etc. These do have an important role to play but must be effective. This requires resources for administration and to follow through decisions, as there is only so much busy individuals can do. Project officer or appropriate administrative/secretarial support is needed to drive forward the agenda and follow up on ideas. Such support must be provided on a secure medium-term basis in order to avoid the disruption and loss of momentum through the diversion of effort into constant recruitment that features in short-term funding.

---

**RSPB (UK/HQ)** Strength of existing regional bodies should not preclude an overarching UK wide body. A wide body would be able to look at non-coastal marine issues that are currently out of the scope of existing 'coastal' fora. Increase in active industries beyond the coastal zone and obligation for offshore MPAs is making paper management increasingly important. Another option is for a group to be established to examine the concept of marine spatial planning on a UK wide basis.

---

**Scottish Envmt LINK Marine Task Force (SEL/MTF)** Believes that regional coastal groups in England are needed to advise on regional development and conservation and that this needs to be established in a formal network to ensure all regions work at the same level of commitment. This network would also need strong formal links with the Scottish forum and Welsh partnership. **ALSO SUBMITTED BY RSPB Scotland**

---

**Scottish Natural Heritage (SNH)** Given current levels of marine policy development there may be scope to revive the English forum with a clearer remit and tighter membership. In order to achieve real engagement there may be need for a wider stakeholder group, even if not heavily involved in the detail of developing strategy. There is a need for better co-ordination to avoid consultation "fatigue".

---

**Trinity House Lighthouse Service (THLS)** The interests of stakeholders are so diverse that it would be difficult to envisage an overarching body being able to gain consensus. A more manageable and workable solution would be the small central of expert group which could advise on recommendations on policy and be open to specialists groups of stakeholders in order to receive expert advice and knowledge as required.

---

**Wash Estuary Strategy Group (WESG)** Seems reasonable if comments from stakeholders through consultation and workshops are taken into account. This would be ensured were a dedicated Government Marine Task Force created.

---

**Wildlife & Countryside LINK Marine Task Force (WCL/MTF) & Wildlife Trusts & WWF** no specific answer given

---

#### **4.4 (8) The Government invites views on its proposal that the second Marine Stewardship Report should be a UK State of Our Seas report, produced in late 2004 and on its proposals for the report's content**

<b>Advisory Committee On the Protection of the Sea</b>	Concerned by the tendency to understate some of the key problems affecting the UK's marine environment. Feel that status reporting & a presentation of Government positions & proposals are two functions and should be separated. A peer reviewed status report would be a useful part of an adaptive management strategy.	Should be written and presented in a style that facilitates public understanding. Some focus on issues such as level of compliance with EcoQOs and management indicators.
--	---	---

---

**Associated British Ports** Report should review progress against the objectives and targets established by Defra.

---

**British Marine Aggregate Producers Association** Supportive. A baseline is essential if a workable integrated system is to be put in place.

---

**Cardiff University** Agree the next report should be in 2004.

---

**CERA (Centre for Environment & Rural Affairs)** Supports both timing & content proposed.

---

**Council for British** Not happy that future MSRs will be adequate.

## Archaeology

---

**Council for Nature Conservation & the Countryside (CNCC)** CNCC welcomes series of MSR reports; socio-economic trends and impact on the natural environment should be included

---

**Countryside Council for Wales** Recommend limited resources would be better directed at action rather than at further reporting. Strongly suggest that report focus on reporting of the current state of the marine environment as measured by indicators & then be used as a baseline to measure progress.

Accept that there will be a need for regular reporting of ecosystem state.

---

**Dart Estuary Environmental Management** Should adopt the format of a progress report. Should not duplicate contents of the original report.

---

**Dorset Coast Forum** Agrees would be better placed writing and implementing actions. Do not see necessity of another report.

---

**English Heritage** Agrees 2nd report should be a UK State of Our Seas produced in late 2004.

Would like to raise the potential of a relationship between 2nd MSR & recently published the State of the Historic Environment (SHER) document.

---

**English Nature (EN)** The 2004 MSR should report on delivery against obligations and commitments in the form of practical work programmes which aim to deliver measurable benefits for marine biodiversity without the need for further lengthy trialing.

---

**Environment Agency** Agrees that 2nd report should be a State of Seas report, this will provide the baseline for production of future reports. Report should cover strategic goals, current status & achievement of ecological quality objectives.

Defra should publish the intended scope for the report so that the necessary monitoring and assessment can be identified and implemented.

---

**Environment & Heritage Service NI** Supports production of SoS style report.

Ambitious target needs proper resourcing and co-operation.

---

**Hartlepool Borough Council on behalf of the Association of Local Government Archaeological Officers (ALGAO)** Endorse a proposal for a 2004 report. Emphasis that this must contain information on progress in documenting and preserving the marine historic environment.

---

**JNCC** JNCC welcomes the proposal for a Report in 2004. The Report should be a technical document providing clear, independent, scientific advice on the state of the marine environment. The scientific advice should be used to develop policy that is supplemented by clear, targeted and time-bound management actions to tackle problems identified by the report.

---

<p>Marine Conservation Society (MCS)</p>	<p>Welcomes the intention to maintain momentum, however, feels that the second Report should be "a Marine Stewardship Action Plan with concrete targets.....and identification of Government Departments and other stakeholders to work towards those targets". There should be a clear timetable for action.</p> <p>MCS would prefer the next report to be in two parts: one on the State of our Seas; the second incorporating the targeted goals and operational objectives, which should be available from RMNC by March 2004.</p> <p>Initiatives progressed since MSR2002 should be reported on and incorporated in the second report and should identify actions to be taken and bodies responsible for each action, within a realistic work programme.</p> <p>The State of our Seas Report should include a section dealing with knowledge gaps and proposal for rectification</p>	<p>Vital to identify gaps in knowledge and identify how these will be overcome.</p> <p>- MCS suggests an outline long-term research programme to deliver on biological distributions, natural processes and ecosystem functioning.</p>
<p>Marine Stewardship Council (MSC)</p>	<p>The next MSR should give more detail as to how the goals and objectives can be put into action together with details of specific initiatives undertaken and their progress in achieving these.</p>	
<p>Ministry of Defence</p>	<p>It is important that the impetus for this activity should not be lost. MOD supports the proposal for a UK state of Our Seas Report in 2004.</p>	
<p>Natural Environmental Research Council (NERC)</p>	<p>The second report should focus on the state of our seas. It should also chart progress to operational observing systems (including real-time delivery) as an additional topic.</p>	
<p>Some members of the former RICS Marine Resource Management and Inland Waterways Panel</p>	<p>That the concept is good, but the 2nd MSR needs to be related to other strategic issues; it should not be an isolated strategy.</p> <p>Land based issues, resource extraction issues and transport issues all need to be dealt with in one report.</p>	<p>Having identified that action needs to take place an option review should be undertaken as soon as possible. Important next steps should also include setting out how ecosystems will be policed and the implications of this under international law and for all stakeholders.</p>
<p>RSPB (UK/HQ)</p>	<p>The 2nd MSR should be much more than "just another" report. It should include targets/actions/timescales for taking objectives forward - sadly lacking in the current MSR.</p> <p>RMNC is due to report in 2004. The 2nd MSR should include the RMNC findings (on specific strategic goals for marine nature conservation), analysis of recommendations and list targeted actions for implementation.</p>	
<p>Scottish Coastal Forum</p>	<p>Promise of future reports is welcomed.</p> <p>Next years report would be a good time to start the evolutionary process of developing indicators for ICZM in addition to other indicators mentioned.</p>	

Scottish Envmt LINK  
Marine Task Force  
(SEL/MTF)

The credibility of future MSRs will depend on whether (new) specific actions are introduced with timescales and naming responsible bodies.  
Supports the aim of maintaining momentum and need to reflect the intensity of different pressures on the marine environment. progress in environmental management and development of environmental indicators should be included in the report.  
Trends in socia-economic usage of the of the marine and coastal environment should also be reported on as this should be linked to the state of the environment and lead to suggestions on how the Government's vision can be declined.

**ALSO SUBMITTED BY RSPB Scotland**

Scottish Environment  
Protection Agency  
(SEPA)

SEPA is supportive of the development and periodic publication of indicators to identify progress on the Marine Stewardship programme and welcomes the proposed publication of further MSRs. Where possible these should be streamlined with existing indicator programmes.

Scottish Natural Heritage  
(SNH)

Suggestions seem sensible. The report should look at the marine resource as well as the pressures acting on it from human and other impacts. It should also evaluate available information for characterisation and assessment of ecosystems and for existing research and monitoring programmes, including indicators to support the ecosystem-based approach.  
Such a report should also incorporate relevant findings from the ICZM Stocktaking Project and build on EN's "State of Maritime Nature".

Solway Firth  
Partnership

The Government should ensure that future reports do not duplicate reports produced by other national organisations.

This could provide an opportunity to produce fewer more informed reports through combining the resources from a number of reporting organisations.

United Kingdom Hydro-  
graphic Office (UKHO)

Future reports need to make Geospatial data available and interoperable.

Wash Estuary Strategy  
Group (WESG)

Timing seems reasonable but would appear to be logical to publish after the Dt's *Future Offshore* for mass expansion of the offshore wind industry as this will impact on, a number of sites.

Wildlife & Countryside  
LINK Marine Task Force  
(WCL/MTF) &  
Wildlife Trusts &  
WWF

WCL/MTF agree with HMGs proposed content for future reports but is of the opinion that trends in socio-economic usage of the marine and coastal environments should be included and that these trends should be linked with those of the natural environment.

WCL/MTF see value in HMG taking the lead on how these trends, lessons learned from the ISPS, OSPAR's ecosystem approach and new ideas and initiatives can deliver its vision.

#### **4.6 (9) The Government invites on its proposal for adopting a holistic-based approach for all Marine Stewardship Reports post 2004 akin to the structure followed in *Safeguarding our Seas***

<b>Advisory Committee On the Protection of the Sea</b>	Appreciate holistic approach but feel report should include reference to operational targets & indicators following the concept of adaptive management. The report will necessarily include a blend of holistic & thematic elements & should be illustrated with reference to case studies.	
<b>British Marine Aggregate Producers Association</b>	Possibly the only way to enable reasonable coverage. This should not rule out the production of sub reports on sector/issue basis. To early to set in stone the type of report.	
<b>Cardiff University</b>	Co-ordination with devolved administration can be achieved through joint publication of future reports. Priorities for content will vary with time and key sectoral developments should not be discounted actively.	
<b>CERA (Centre for Environment &amp; Rural Affairs)</b>	Applauds proposal for future reports. Need for reports to demonstrate a co-ordinated approach to management.	
<b>Council for British Archaeology</b>	Welcome approach that reports should be holistic but not convinced that this is genuinely envisaged with regard to integrating the marine cultural heritage.	
<b>Council for Nature Conservation &amp; the Countryside (CNCC)</b>	CNCC agree that report should be holistic in its approach. Should also progress the over-arching strategies and HMG's an ecosystem approach to management, governance of regional seas and the replacement or streamlining of current sectoral and legislative measures.	
<b>Countryside Council for Wales</b>	Agree in principle to holistic based approach.	
<b>Dart Estuary Environmental Management</b>	Holistic approach supported.	
<b>English Heritage</b>	Welcomes the holistic based approach.	
<b>English Nature (EN)</b>	EN expresses concerns on the proposed focus of the next report planned for 2004. Agree that holistic approach is required in 2004 and beyond with the detail of implementation more clearly set out in an overall framework.	
<b>Environment Agency</b>	Agree future reports should build on the format of the 2004 report. Should include a review of the Water Framework Directive provisional status definition for transitional & coastal waters.	Future reports should focus on the impact of human activities& indicators of impacts of climate change.
<b>Environment &amp; Heritage Services NI</b>	Supports holistic based approach, would also be linked to other international reporting requirements.	

The Federation of Scottish Aquaculture Producers	Holistic based approach with same style and structure and focusing on delivery seems to be the way forward.	
JNCC	Cross cutting holistic report are in harmony with the ecosystem approach. Future reports should be short and succinct, reporting progress against targets developed to achieve the Strategic Goals. Developed targets should be reported. Holistic reporting requires adequate ecosystem-reporting tools and should be supplemented by more focussed, cross-cutting reports on specific contemporary issues.	Ecosystem-reporting tools currently do not exist and need to be developed and tested if the Government wishes to adopt its own approach.
Marine Biological Asscn (MBA)	SACs are vulnerable to contaminants and updates together with a disturbance study could coincide with the publication of MSR2 in 2004 and in subsequent MSRs at 3yr intervals.	
Marine Conservation Society (MCS)	Combining State of Our Seas type report with a review of progress could be unwieldy and confusing. May be better to have supporting reports focusing on a particular aspect.	
Marine Information Network	The regular publication of MSRs is welcomed. This needs, initially to be on an annual basis to actively report on initiatives and progress towards achieving goals and keep relevant bodies informed. This is essential to keep the momentum going. Agrees a holistic-based approach is essential. Report needs to consider the needs of human activity in relation to the marine environment and also the needs of the marine environment in response to the demands which human activity placed upon it.	
Ministry of Defence	While agree that such a report, should be holistic in approach, it should remain flexible to take a themed approach if necessary.	
Natural Environmental Research Council (NERC)	A holistic approach to all Marine Stewardship Reports would be strongly welcomed.	
Some members of the former RICS Marine Resource Management and Inland Waterways Panel	Needs to be related to other strategic issues. Issues concerning commerce, property development, conservation, recreation, defence, erosion and transport all need some form of overall vision.	
RSPB (UK/HQ)	Could be too early to make a decision on coverage of future MSRs as the content of the 2nd MSR will be influential. 2nd MSR should make recommendations on scope, coverage, content and timing of future MSRs.	
Scottish Coastal Forum	A holistic based approach to future reports seems appropriate provided that all cross-cutting themes are addressed. Stakeholder involvement in marine/coastal matters is expected to increase, an assessment of its effectiveness should be	The value of the MSR was the ability to deliver an overview in a single document.

carried out in due course.

---

Scottish Envmt LINK  
Marine Task Force  
(SEL/MTF)

Agree with holistic approach. Should also progress the over-arching strategies on management and how Government will deliver:

- an ecosystem approach to management of UK seas and marine resources
- governance of regional seas (not just conservation)
- streamlining or replacing complicated sectoral and legislative measures.

**ALSO SUBMITTED BY RSPB Scotland**

---

Scottish Natural Heritage  
(SNH)

Holistic approach is agreed. There may be need to focus on specific issue(s) in detail. There must be further development of objectives and actions towards achieving strategic goals. There will be a need for ongoing reports on research and monitoring and feedback into policy development and management.

---

Solway Firth  
Partnership

There is certainly value in producing holistic reports which focus on all of the issues across the different sectors. However there is also a need for specific reports on the state of both the coastal & marine environment.

---

Wash Estuary Strategy  
Group (WESG)

Agree with the adoption of a completely holistic approach as The Wash and adjacent waters are subjected to the combined impact of the complete set of anthropogenic activities.

---

Wildlife & Countryside  
LINK Marine Task Force  
(WCL/MTF) &  
Wildlife Trusts &  
WWF

WCL/MTF agree, but see the holistic approach as a vehicle for progressing the over-arching strategies on management and HMG's proposals to deliver:

- an ecosystem approach to management of UK seas and marine resources including EEZ
- governance of regional seas holistically and x-boundary
- how current sectoral and legislative measures can be stream-lined or replaced.

---

#### **4.9 (10) The Government invites views on how frequently Marine Stewardship Reports should be published assuming that the second Report is published in late 2004**

Advisory Committee On  
the Protection of the Sea

Agree to publish every 3 years.

---

ARUN District Council

Publication of report should be on an ad hoc basis with a maximum time limit of 4 years.

---

British Marine Aggregate  
Producers Association

Reasonable to publish every 3 years. The need to produce subject/sector specific information on ad hoc basis.

---

British Ports Association

No strong views on publication but hope future reports are brief & concentrate on strategic direction.

---

Cardiff University

Agree reports should be published at 3 year intervals.

---

<b>CERA</b> (Centre for Environment & Rural Affairs)	Agree for publication every 3 years but feel that information would be updated more regularly on a knowledge bank on which reports could be updated, as they become available. Should establish links with other historic environment reporting mechanisms.
<b>Council for British Archaeology</b>	Feel the reports should be more frequent than once every 4 years.
<b>Council for Nature Conservation &amp; the Countryside (CNCC)</b>	3-4 years appropriate for MSR publication but would welcome more regular information on UK marine and coastal projects and initiatives to be disseminated electronically.
<b>Countryside Council for Wales</b>	Further publications should be done on an ad-hoc basis. Should dovetail, where possible with other reporting commitments
<b>Dart Estuary Environmental Management</b>	Should be produced on an "as required basis". A further report in 2006 could be justified by the ICZM reporting deadline.
<b>Dorset Coast Forum</b>	Ad hoc basis & should only be produced when there is new information or a review of actions is needed.
<b>English Heritage</b>	Recommends that an annual report be published which would complement the State of the Historic Environment (SHER) annual report.
<b>Environment Agency</b>	Five year intervals would seem appropriate. Timing of reports should be co-ordinated with other European & UK reporting requirements, where they complement each other.
<b>Environment &amp; Heritage Service NI</b>	MSR should be produced fairly frequently (every 2 years), which will require further development of marine indicators.
<b>The Federation of Scottish Aquaculture Producers</b>	Only justified if material developments to report. Would seem unproductive to produce reports with any more frequency than 3 years.
<b>JNCC</b>	JNCC supports report publication at approx 3 yr intervals and advocates the inclusion of targets for action agreed in other.
<b>Marine Biological Asscn (MBA)</b>	MSRs at three year intervals sounds about right could also include updates on all UK marine SACs whether designated under the Habitats Directive or not.
<b>Marine Stewardship Council (MSC)</b>	Should be produced annually.
<b>Ministry of Defence</b>	Supports the proposal that reports should be on ad hoc basis, rather than be produced at regular intervals.

<p>Natural Environmental Research Council (NERC)</p>	<p>An interval between reports of 3 years seen appropriate. However it would be a shame not to have more frequent holistic updates. There is a case for considering a newsletter which could be disseminated regularly during the interval between reports - say annually, which would keep the holistic approach to the fore.</p>	
<p>Northumberland Sea Fisheries Committee (NSFC)</p>	<p>Feel that publication every third year would lead to stakeholder not feeling involved and having no idea what is actually going on. If communication is to be meaningful the report needs to be annual.</p>	
<p>RSPB (UK/HQ)</p>	<p>Important that the reporting process does not become a continuous paper exercise. Vital that current reporting cycles are built into any reporting framework.</p>	
<p>Scottish Coastal Forum</p>	<p>Regular updates of progress are needed but other media could be used for this e.g. end of year progress chart in <i>wavelength</i> or an ongoing table to the Defra website.</p>	
<p>Scottish Envmt LINK Marine Task Force (SEL/MTF)</p>	<p>Regular MSRs at less than 4 year intervals are needed. These reports should evaluate Government's commitment to deliver its vision etc. Stakeholders need regular inform action on projects and initiatives - similar in format to <i>Wavelength</i> or the Scottish Coastal Forum electronic newsletter.</p>	<p><b>ALSO SUBMITTED BY RSPB Scotland</b></p>
<p>Scottish Natural Heritage (SNH)</p>	<p>SNH agrees with the suggested time interval provided that interim related reports are released for consultation according to schedules rather than delayed to tie in with the MSR.</p>	
<p>Wash Estuary Strategy Group (WESG)</p>	<p>A rolling, ad hoc programme of reports with a maximum period of three years between any two adjacent reports is acceptable.</p>	
<p>Wildlife &amp; Countryside LINK Marine Task Force (WCL/MTF) &amp; Wildlife Trusts &amp; WWF</p>	<p>WCL/MTF agree that regular MSRs at less than 4 year intervals is welcomed. These reports should evaluate HMG's commitment to deliver its vision etc. Stakeholders need to be kept informed of projects and initiatives - similar in format to <i>Wavelength</i> or the Scottish Coastal Forum newsletter.</p>	