

Science Advisory Panel Feedback – 2nd Progress Report

OVERVIEW

The Science Advisory Panel provided feedback on the 2nd Progress Report in November 2010, in which the considerable work of the Balanced Seas Regional Stakeholder Group is acknowledged.

The document is structured in three parts: a summary of how well the emerging network fulfils the Ecological Network Guidance can be found under [Assessment of performance against principles](#), followed by [Detailed comments specific to Balanced Seas](#) and then [General comments relevant to all the Regional Projects](#).

In brief, the feedback directed to the Balanced Seas RSG includes the following advice (the relevant paragraph is noted in brackets for reference):

- Complete **Conservation Aims** for dMCZs and existing MPAs (1.4)
- Take **biogeographic variation** into account when meeting replication targets (1.7)
- Identify **Candidate Reference Areas** by the 3rd iteration (1.10)
- Consider **geological and geomorphological features** during the 3rd iteration (1.14)
- Examine **benthic and water column protection in the Southern North Sea subregion** (1.16)
- Discuss **cross-boundary MCZs** with other regional projects (1.17)
- Consider **co-location with wind farms** on a site by site basis (1.20)
- Increase use of **Sea Fishery knowledge on spawning grounds** (1.24)
- Take care in considering **mobile species records for offshore sites** (1.25)
- Consider **Water Framework Directive targets** (with Environment Agency) (1.26)
- Take care when considering **single records of species** (2.2)

Please refer to the full feedback document to read the additional advice and feedback.

N.B. SAP feedback on the First Progress Report and the Balanced Seas response to it (submitted with the 2nd Progress Report) can both be found on the RSG Resources page at www.balancedseas.org.

**Response by the MPA Science Advisory Panel
to the 2nd iteration proposals made by Balanced Seas**

Assessment of performance against principles**Summary**

Representativity: Progress made, with the inclusion of intertidal BSH and FOCI, and inclusion of existing MPAs. 100% of habitat FOCI and Broad Scale Habitats are contained in the network of BAI + MPAs. The remaining 11% of species FOCI still need to be included. Network not yet developed to level of *draft* or *provisional* MCZ.

Replication: making good progress, but not yet at 100%. Replication does not accommodate the two biogeographic zones of this RP area (E. Channel, S. North Sea).

Adequacy: BAI plus existing MPA areas exceed minimum targets for many broad areas and habitats. A stable GAP analysis needed to confirm this, and details to be provided.

Viability: Good progress – viability data should be provided for features in the finalised descriptions for each MCZ and MPA.

Connectivity: Generally well-spaced BAI. Work to be done to demonstrate connectivity for each habitat and FOCI, not at level of BAI. RP is working to 40 km radius criteria (this precautionary approach is applauded).

Levels of Protection: beginning to be addressed – very draft conservation aims for some BAI.

Best Available Evidence: Yes. Incorporation of more recent data sets and regionally provided data. The SAP encourages further use of appropriate data.

Areas of Additional Ecological Importance: Good development since 1st iterations. Various AAEI Data layers and Marxan analysis now available.

1. Detailed comments specific to Balanced Seas

- 1.1. The 2nd iteration takes forward the model of working that generated the first iteration. Within the three sections, considered by different working groups, 26 Broad Areas of Interest (BAIs) have been identified across the three regions. Some of the BAI in the 1st iteration have been merged, and additional BAI identified. There are also some areas still being discussed, related to particular BAI. The SAP note that the BAI are not yet identified as either draft or provisional MCZ, and therefore may be subject to change in the 3rd iteration.
- 1.2. Progress has been made by the project team and the working groups towards identifying potential Marine Conservation Zones. The SAP is pleased to see that the RP have identified necessary activities to complete the 3rd iteration, and has confidence in the working practices of the RP. The thoughtful response to the SAP 1st iteration response is acknowledged and appreciated.
- 1.3. BAI have been assigned a level of stakeholder support: high, medium and not discussed. These levels are logical, and the SAP notes that this is “work in progress”, but also notes the concerns raised in the comments of individual



members of the RSG. A considerable effort is still required to obtain support for the BAIs yet to be discussed.

- 1.4. The SAP welcomes the drafting of conservation aims for the individual BAIs as an important step forward in the development of conservation objectives, as suggested in its response to the 1st iteration. It regrets that much work remains to be completed in drafting both aims and objectives and securing stakeholder support for them. It is concerned that progress elsewhere will be held up until the task is completed. Advice on the content and style of dossiers containing these aims and the essential characteristics of the eventual MCZs is offered in paragraph 2.3. This is intended to increase their utility not simply their appearance. In a similar vein, the data tables contained in the Annexes are an excellent way of characterising the Regional network. It will be helpful if these are numbered and given appropriately descriptive headings.
- 1.5. The BAIs achieve the **Representativity**, **Replication**, and **Adequacy** numerical targets for all the 21 BSH occurring in the region. The **Adequacy** targets exceed the maximum criterion for 11 habitats. These figures are likely to change when the level of protection afforded by existing MPAs is finalised and the network of MCZs is defined in the 3rd iteration.
- 1.6. Where no numerical targets for Adequacy are given in the ENG, a description of how the relevant FOCI or BSH meet the guidelines for replication, viability and connectivity should be provided.
- 1.7. ENG **Replication** targets are claimed to have been met for 93% of habitat FOCI and 73% of species FOCI. For many FOCI, between 3 to 5 occurrences within BAIs have been achieved. Intertidal data have now been included, as well as better integration of data from existing MPAs and BAIs. Balanced Seas is reminded that biogeographic variation should be taken into account when meeting replication targets, which should be met for all features whose distribution allows this. Paragraph 2.7 is relevant.
- 1.8. It is disappointing that the MPA reporting tool is not assessing **Viability** correctly. Assuming that this can be corrected the SAP encourages its further use. It is not entirely clear how **Connectivity** is being assessed by Balanced Seas, beyond noting that the lower limit of 40Km is being used. It may be appropriate to remind those concerned that the measurement should be made between boundaries of MPAs of similar habitat.
- 1.9. The SAP is concerned to understand whether the presented network of BAIs has been driven by the new ecological data that have been made available, or moulded around the basic framework laid out in the 1st iteration. (And whether this is due to convenience rather than the primacy of identifying an ecologically coherent network). The SAP notes a number of individual RSG comments in the report highlighting this issue, that no new additional areas of ecological importance were identified and reflected in the choice of BAI (at least) by the

later analysis. The inherent flexibility which is provided by working with BAIs should allow refinement of the prospective network as new information emerges. The SAP notes the comments in Appendix 6 of the report concerning the interpretation of AAEl and encourages the panel to seek further guidance from the SNCBs if this is likely assist the RSG. The SAP does expect AAEl information to be used to the full to prioritise the selection of MCZs, as required by Guidelines 20 & 21.

- 1.10. No candidate Reference areas have been identified. This must be done for the 3rd iteration.
- 1.11. It is clear that some additional regional data sets have been made available to the Balanced Seas team. This is very welcome. The SAP notes that data from the IoW, Sussex and Kent Wildlife Trusts were included. Though the formal deadline for data submission has passed, data from Essex Wildlife Trust should be secured to ensure an equal treatment of the different geographic areas within the RP area.
- 1.12. The SAP has commented on the use of single records of FOCI In paragraph 2.2.
- 1.13. The SAP believes that Marxan runs based on the distribution of features such as FOCI, and all indicators of areas of ecological importance can provide useful guidance on the siting of MCZs. The use of Marxan to assess the significance of single FOCI records has been recommended in paragraph 2.2.
- 1.14. The SAP welcome the statement that geology and geomorphology information will be incorporated when developing the network for the 3rd iteration but regret that this was not possible in this iteration.
- 1.15. Broad areas of interest in the Thames Estuary and Essex/Suffolk are still very estuary-focussed, but with a large zone between the Colne-Blackwater and Rouch-Crouch estuaries, argued as a “whole ecological unit”. Careful definition of such statements is required, given that for example, this BAI excluded the Maplin sands region of the Essex Estuaries SAC (if this is a whole ecological unit, then why is this region excluded?).
- 1.16. No BAI or areas of additional ecological importance have been identified in the offshore sections of the southern North Sea sub-region. The rationale for this given by the Balanced Seas team in the 1st iteration was that there is a large area of pSAC covering these offshore habitats. These SAC are now designated (as is the SPA). A detailed GAP analysis should assess the actual level of protection to benthic and water column habitats such designations provide.
- 1.17. Consultation with adjacent RP should take place before the 3rd iteration to see if MCZ on the boundaries can be joined in a coherent fashion, complying with ENG guidelines on shape and size.

- 1.18. There is still uncertainty about the levels of protection existing MPAs provide, and whether they protect the range of habitats within their areas. Indeed, it seems very unlikely that they do especially given the narrow range of habitats for which they were established. This is a very important problem, which needs to be resolved as a matter of urgency. SAP views on this subject are recorded in paragraph 2.1.
- 1.19. The SAP notes that the concerns about the equivalence of MCZs and existing MPAs are also raised by a number of RSG members. There are some broad scale features, habitat FOCI which might not meet ENG targets if existing MPA protection is insufficient. E.g. A2.2, A2.3, A2.4, A5.2, and Seagrass, sheltered muddy gravels, native oyster beds, intertidal under boulder and mud habitats in deep water.
- 1.20. It appears that co-location with designated wind farm sites is being avoided. The SAP advice is that the merits and demerits of co-location should be considered on a site-by-site basis, and will depend on the activities that will take place on the site and the conservation objectives of the prospective MCZ, based on the features present – see paragraph 2.15. The use of the new tools (PRISM etc.) will be helpful in considering these issues further, as conservation objective are developed.
- 1.21. Some regional SE England special features / species of interest have been identified by the RSG and used to support decisions. The SAP welcomes this regional approach and supports extending the “lists of species / habitats” where there are good conservation grounds (e.g. rarity in region, fragility of features/environment, long lived, slow growing taxa or known level of threat) and RSG support.
- 1.22. The SAP’s earlier concerns that well-described and important sites in the Solent and estuarine areas of the western sub area were not currently BAI have been partly addressed by new BAI identified in this area. Further GAP analysis of the Hampshire portions of the Solent and Southampton Water is necessary.
- 1.23. The offshore region in the English Channel and in the Straits of Dover is well covered by some large offshore BAIs. Work has been done following SAP advice about when and where incorporation of major shipping channels into BAI would be appropriate.
- 1.24. Given the paucity of the CEFAS spawning areas data layer, greater use of Sea Fishery knowledge on spawning grounds should be used. The SAP notes that Balanced Seas has done this in certain areas; the Black Bream site in the English Channel, and acknowledgement of the location of Herring Spawning Grounds. The Blackwater Herring subspecies spawns on the Eagle Bank. This is well known and recorded (Fox and Aldridge 2000, *JMBA UK* **80**: 921-928). CEFAS have also published studies on Sea Bass breeding locations in the Greater Thames Estuary (Pickett *et al.* 2004. *Fisheries Research* **68**: 329 – 342). It is not clear to the SAP

why this peer-reviewed and public-domain information is not included in the data layers provided.

- 1.25. Some of the data on mobile fish (for example for Eels and Rays) are of little value for BAI identification. Eels are marked as occurring everywhere. Though the SAP acknowledge that Eel populations in W. Europe have fallen dramatically and that Eels are a species of conservation concern, the suggested causes of this decline will not be addressed by BAI or a network of MCZs. The SAP view is that there is no point in attempting to protect eels offshore by this means and their presence there should be disregarded unless there is local knowledge of aggregations. Attention is drawn to Box 1 on page 75 and the discussion on page 55 of the ENG which suggest where aggregations of mobile species are likely to occur.
- 1.26. The SAP wishes to encourage further engagement with the Environment Agency (Eastern Region and Thames and Southern Region – the latter two are to be merged in the current reorganisation process) with respect to the coastal zones of the RP area. It notes that this engagement remains on Balanced Seas list of work to do. As mentioned previously, there are plans underway for all of the Thames/Essex estuaries under the Water Framework Directive and there is a need for greater liaison with them on how to maximise the benefits of MCZ designation. The Environment Agency has responsibility for fisheries in the Thames region. The Environment Agency has also obtained the endorsement of relevant local authorities for the shoreline Essex and South Suffolk Shoreline Management Plan. It is understood that some coastal realignment is suggested in sites within BAI that host important intertidal and lagoon species. The SAP encourages the RP and the RSG to take into account these parallel processes and to maximise any gains where possible. The advice given by the SAP on this subject in the response to the 1st iteration is still relevant.
- 1.27. Clarification of the types of sites included in the data layer labelled “marine sites of nature conservation importance mSNCI” is requested, and why these are only identified in the English Channel.
- 1.28. The BAI contain some factual errors:
 - 1.28.1. **BAI 3**. Blackwater, Crouch and Roach Estuaries. The title should include the Colne; this is a separate system to the Blackwater.
 - 1.28.2. **BAI 12**. The Bassurelle. There is an error in the Table which suggests that coastal saltmarshes/saline reedbeds are present at the site.

Overall summary

The SAP acknowledges the progress made in the 2nd iteration, in particular in the form of the more detailed assessment of the characteristics of the BAIs and the features within them. FOCI are beginning to be considered but this work appears to be stalled because of the continuing uncertainty over the protection afforded by existing MPAs.

Data layers have been assembled to help identify areas of additional ecological importance but these do not appear to be influencing the choice of BBs. It is hoped that the just-released biodiversity data layers will help progress to be made. There is an urgent need to select Reference Areas to meet the criteria in the ENG and the important step of defining actual MCZs has to be taken. Completion of the assessment of those BAIs which do not yet have stakeholder support will be crucial. Conservation objectives should be directing these choices but they remain to be agreed.

This represents a substantial workload to be completed before the submission of the 3rd iteration in early 2011. The SAP understands that stakeholders have continuing concerns about the definition of management measures that will be necessary to achieve the conservation objectives. It is hoped that the creation and use of the activities - features matrix and tools such as PRISM and PISA will help to overcome these concerns.

2. General comments relevant to all the Regional Projects

- 2.1. The SAP is very disappointed that data sets which define the protection provided by the existing and proposed MPA network of SACs, SPAs, SSSIs, and Ramsar sites – the so called Gap Analysis - are still under development. The ENG makes it quite clear (p24) that the first step in the process to be pursued by the Regional Projects should be to assess the protection provided by existing MPAs and the absence of a stable statement on this matter, being provided by the SNCBs, is a serious, constraining deficiency that is regretted by the SAP. Concern does not arise simply because absence prevents assessment against criteria, but the SAP believes that delay and fluctuation in the provision of advice casts doubt on the reliability of assumed protection being provided by the existing MPAs. If there are shortcomings in that protection, they need to be exposed so that corrective action can be taken in designing the MCZ contribution to the overall MPA network.

- 2.2. The SAP notes that single occurrences of many of the FOCI species are found in a serendipitous way (for instance seahorses, sea fan anemone, stalked jellyfish, gooseneck barnacle, crawfish, fan -mussel). They are probably more widely distributed than indicated and also may be 'gone' next time a particular location is sampled. Similarly, if another location is surveyed, they may well turn-up there. In the process of assessing options for MCZs, it is likely to be helpful if Marxan runs are performed to identify areas of general ecological importance with a down-weighting of single records. Such outputs should be compared with the full Marxan outputs to allow comparison by stakeholders. However, it is emphasised that single records of species should only be used **to justify creation of a MCZ** if they are a persistent feature at that location. Records should only be accepted for consideration as part of the case for a MCZ if the populations are established, can be reliably found at the location on separate visits and numbers are significant (the species would be described as occasional or higher abundance) at a location. Historical records that suggest the location was previously occupied by a resident

or regularly occurring population of that FOCl species can also be used, bearing in mind that MCZs are expected to aid recovery.

- 2.3. The report from Balanced Seas and Net Gain included information on d/pMCZs which was laid-out almost in a dossier style. Other Regional Projects have also included descriptive information on d/pMCZs. A house-style for these documents needs to be agreed to ensure a consistent approach and that all of the relevant information/evidence is included **for each MCZ and the MPAs that are being relied upon to deliver against the ENG targets**. Dossiers are not full management plans but include a clear boundary map on a chart backdrop and a catalogue that explains what are the features that make the area important including the broad scale habitats, the FOCl, 'Additional ecological importance' and 'Other' features, the geophysical and geomorphological interest, and the conservation objectives. The SAP is willing to suggest what categories of information are desirable in a dossier, if that would be helpful.

- 2.4. Science/conservation stakeholders in Balanced Seas had identified additional (to FOCl) species as of particular interest in the certain areas. This 'interest' may be because the species is in fact scarce or threatened (but did not have the necessary quantitative data to pass BAP tests) or may be because, although it is widespread, it is rarely seen in the relevant biogeographic area. Whilst such information may be considered 'supplementary' (it would be a major effort to map, identify hotspots etc.), those 'designated taxa' that didn't make it to BAP or OSPAR may 'make the case' for the importance of a site. Identification of such species was encouraged by the SAP in its comments on the 1st iteration, specifically mentioning "Important Plant Areas for marine algae, species that are rare or threatened and locations of scientific interest and to list the evidence relating to that site."). The SAP continues to encourage this approach and suggests that these species be included in the dossier of information on a MCZ. The check list is the spreadsheet of 'Designated taxa'.

- 2.5. Bearing in mind the points made about assembling all of the biological information that is relevant to a proposed MCZ, the SAP encourages specific workshops of experienced and knowledgeable marine biologists to populate the suggested dossiers.

- 2.6. The SAP is seeing maps of whole RP areas with the BBs or BAIs shown. Zooming-in leads to a very coarse base layer making discrimination of boundaries and enclosed feature very difficult. The next iteration should show each MCZ as a detailed map with layers that inform bathymetry, location and occurrence/extent of FOCl features as part of the dossiers.

- 2.7. There may be some misunderstanding of reference to “biogeographic areas” or to an imperative to recognize biogeographic variation. The SAP has a responsibility to advise on how MCZ proposals can best incorporate biogeographic variation and may have to propose adjustments to MCZ locations to achieve that goal. There are significant local differences in the biotopes that constitute each EUNIS Level 3 biotope and, indeed, the component species of a fine-scale biotope even at, say, level 5. Thus, for instance, circalittoral rock in North Devon will have a different species composition to the same biotope off south Devon. Therefore large single pMCZ which can account for a very high proportion of any one BSH should be discouraged as in all likelihood they will contain very similar biotopes when what is needed is greater representation of the range of biotopes within any one L3 habitat. It is acknowledged that L3 does not give sufficient species detail to infer biogeographic variation; this requires further marine biological information. The need to capture and use such information provides part of the rationale for the advice in paragraph 2.5. Where available such information should be retained in the dossiers. So, when biogeographic variation is mentioned, there should be a description of what is being represented in as much detail as possible.
- 2.8. Consideration of inshore and offshore or sub-regions apparently continues to result in boundaries of d/pMCZs or BBs that follow those artificial boundaries. The boundaries between Regional Projects are another source of artificiality. Within the limitations imposed by national boundaries, the RPs should (continue to) ensure that the area occupied by an interest feature is represented regardless of project or sub-group boundaries.
- 2.9. Wrecks are being cited as features deserving of protection by Balanced Seas both because of the increased biodiversity they create (in otherwise sedimentary areas) and because of their archaeological/historical importance. Naturalness is greatly valued in nature conservation and it is not clear that protection should be afforded to wrecks, or any other sea bed installation on these grounds. The SAP discussed this point and concluded that wrecks are not themselves a natural feature and the relevant authorities (English Heritage) have their own process for designating important wreck sites. Also, (although not necessarily what was intended) designating wrecks is not a part of the agreed MCZ process. The SAP believes that occurrence may be considered as part of the case for a MCZ, if FOCI species or important ‘other features’ occur on artificial substrata, but not otherwise. This advice is pertinent when assessing the merits or otherwise of offshore wind-farms and other artificial structures.
- 2.10. The data workshop held in Peterborough on 4 November further outlined the problems that exist in having confidence in mapped seabed types in at least some areas. It seems that UKSeaMap has very poor confidence when considered **as a whole** but the SAP has been advised that the low confidence scores are not

relevant to the data being used. So, without further investigation being possible in the time available, our advice to the RPs is to use both UKSeaMap and MESH with caution, to use better information where obtainable and to seek advice from JNCC on interpretation where there is any doubt and where stakeholders do not have relevant knowledge.

- 2.11. The SAP appreciates that the definition of some FOCI Habitats is unclear and RPs have had some difficulty identifying the parameters to map. The SAP is willing to help further if asked by the SNCB's BAP Steering Group and has forwarded suggestions to them with a request that the definitions be clarified as soon as possible.
- 2.12. Unless more precise data on the location of spawning areas on the open coast can be obtained soon, the RPs will be unable to incorporate that feature into their plans.
- 2.13. The SAP discussed issues that had been raised by the RPs regarding component habitats within **estuaries** and specifically:
- (a) Whether MCZs should be added to existing designations;
 - (b) whether whole or only (high biodiversity interest) parts of estuaries should be identified as MCZs, and
 - (c) whether dredged and developed areas of estuaries should be included in pMCZs.

Our advice is that:

- (a) Each estuary needs to be considered on a case-by-case specific basis, beginning with the conservation objectives, then identifying activities that need to be controlled to achieve them, and then whether existing measures are adequate. The conservation objectives may be to achieve reference conditions, maintain existing high biodiversity habitats or to ensure recovery of previously damaged habitats. The activities to be controlled may be outside the estuary, in the freshwater or fully marine areas.
- (b) An MCZ is needed when protection is required beyond that afforded by existing measures. Because of the nature of an estuary and the way the habitats are interlinked then, unless there are good reasons otherwise, the whole estuary should be the appropriate size for an MCZ. (A non MCZ designated estuary can still be part of the ecological network if that is appropriate.)
- (c) The boundaries of the MCZ should include the area that encompasses the FOCI and other identified features (such as spawning and nursery areas) deserving of protection, including intertidal areas. The FOCI will contain diadromous species and juvenile fish migrating into nursery areas hence the boundaries are upstream or at sea: because of this, connectivity becomes a dominant feature (perhaps more than in the open sea).

- (d) Although it would be preferable to designate the whole ecological unit (usually the whole estuary unless there are physical barriers that limit exchanges) and control potentially damaging and disruptive activities, if necessary and if possible, an estuarine MCZ can be divided (areas excluded), BUT it is important to recognise the nature of estuaries as a functioning unit and therefore the possible consequences of activities in a non-designated portion on the rest of the estuarine MCZ.
- (e) In considering the activities that need to be controlled, bear in mind the prevailing natural conditions and the intensity and scope of potentially damaging activities. For example, a turbid estuary carrying a large amount of sediment may require frequent dredging to maintain the navigation channel for a port, but the natural ecology will have developed to thrive in that turbidity and additional sediment re-suspended by the dredging may have little damaging (or even detectable) effect. Alternatively capital dredging, that disturbs pristine [previously undisturbed] areas of the estuary which contain the FOCI or nursery/spawning locations would have to be controlled. Fishing may need to have periodic controls, and methods that damage the FOCI would be precluded.

All such considerations follow from the conservation objectives, which is why their articulation provides the starting point.

2.14. The ENG makes it clear that each broad-scale habitat type and habitat and species FOCI, where they occur, should have at least one viable **reference area** within each of the four regional project areas. Viability is determined by the size and shape of the reference area and guidelines are provided for these characteristics (ENG sections 4.5.3 and 7.10). Reference areas may be part of or an entire MCZ. The guidance on Reference Areas released recently by JNCC and NE provides further definitions of the terms used, and guidance on what activities will be restricted, or require mitigation, within reference areas. This is very similar to the advice on the subject provided by the SAP in response to the 1st iteration but expands upon it. The SAP will respond to specific requests for further guidance on the scientific rationale and its implications for the design of reference areas, where it is able to do so.

2.15. Guidance on planning for MCZs where socio-economic activities occur or are planned has been provided by the SNCBs¹. From a scientific viewpoint, co-location with energy developments (renewables / oil and gas) can only be considered on a site by site basis and the conservation objectives and the particular activities are the material issue. Different structures (wave, tidal, offshore wind and oil & gas platforms) will have very different effects on the water column structure and benthos (i.e. the level of mixing, types of turbulence, scouring), introduction of hard substratum including anti-scour measures, the location of amphidromic points, the amount of noise, the type of potential pollutants accidentally and intentionally released (i.e. anti-fouling) and the need for fishing / shipping activity

¹ http://www.naturalengland.org.uk/Images/MCZdata_tcm6-22504.pdf

restrictions. Thus, as an example, if the conservation objective is to simply provide adequate representation of a specific L3 habitat (e.g. A5.1-4) in a favourable condition and the construction of a windfarm does not significantly affect the integrity of those habitat features, co-location may be possible. However if the conservation of the site was based on A5.6 and FOCI, it would not be sensible to assume co-location could occur.

2.16. Having taken account of the ecological, geological and geomorphological considerations listed in the ENG and as they begin to firm up their MCZ network proposals, Regional Projects are reminded that they should bear in mind the practical considerations defined in sections 6.2 and 6.3 of the ENG. These latter require assessment of the scientific value of prospective MCZs and should take account of the Guidelines 25-28 on boundary definition. Attention is drawn in particular to the possible use of habitats to delineate sites where there is a clear functional link between habitat and species' distribution. Section 5.3 of the ENG provides useful guidance on prioritisation between degraded and less impacted sites.

30th November 2010