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Our Ref:SAH/ML2

Your Ref:

marine@wales.gsi.gov.uk

Marine Policy Branch
Welsh Assembly Government
Cathays Park
Cardiff
CF10 3NQ.

26th April 2011

Dear Colleagues

Consultation on Sustainable development for Welsh seas: Our approach to marine planning in Wales

Introduction

This letter is in response to your consultation above. It is made on behalf of Seafish following discussions with its Marine Environmental Legislation Expert Group. This group consists of cross sector industry representation, as well as country government departments and agencies.

Seafish is a non-departmental public body that provides support to all sectors of the seafood industry. It has no official mandate for involvement in resource or environmental management but has an obvious interest in the outcomes of the management processes. Seafish has a publicly stated commitment to “the sustainable and efficient harvesting of those resources on which the UK seafood industry depends, the protection of marine ecosystems, and the development of marine aquaculture based on sustainable resource utilisation and best environmental practice”.

We have provided answers to many of the questions asked in the consultation document in the second half of this response, but we would like to begin with some general comments.

General Comment

There are several points made in the document which we welcome;

- The intention to plan inshore and offshore areas together, thus ensuring continuity
- Having sustainable development as a key aim
- Recognising that the plans need to provide as much certainty as possible
- Stating an intention to take all reasonable steps to ensure compatibility with neighbouring plans
- Stating an intention to engage fully with industry
- Recognising the need to map activities so that they can be taken into account

In responses to previous consultations on marine planning we have stressed the importance of these things to the industry, and we are pleased to see that they have been included in the Welsh document.

There are however still some things which concern us.

- The intention to learn particularly from the terrestrial system of planning, which we feel will lead to plans being more one dimensional and spatially fixed than is appropriate to the sea
- The fact that there are still no policy priorities. It states in the marine policy statement that priorities will emerge more locally in the planning stages, and still as the process moves on there is no indication of priority. The document recognises the need to provide as much certainty as possible, but how can this be possible without priorities being set?
- The document states the intention for Wales to establish some highly protected marine areas in order to monitor the consequences of these. We feel that with the current lack of accurate scientific data regarding the seas and the difficulty of obtaining meaningful data, any such areas will be of questionable value at this stage.
- Also regarding these highly protected marine areas they appear to be proposed with the purpose of scientific study. If so, it is our opinion that they are not permitted under the Marine and Coastal Access Act
- We welcomed the intention above to engage fully with industry indeed the document states that the stakeholder group to influence the process has already been established. On closer inspection of its membership however we note that fishing has only a single representative (from Cardigan Bay), and aquaculture is not represented at all. We are surprised by this and suggest that this is not sufficient engagement bearing in mind the importance of these industries
- We also believe that planning fishing activity is something which can only be undertaken as a consequence of the rules of the Common Fisheries Policy, and as such, marine planners do not have the right to plan fishing

under the Marine and Coastal Access Act. That distinction has not been made clear in the document

Specific Questions

Question 1

Are there any other key features, resources or activities in Welsh seas that we need to take account of?

Activities of foreign fishing vessels which operate in both the inshore and offshore areas. There is also a need to recognise that sectors such as capture fisheries may need to diversify into other species, and that aquaculture should expand to help ensure food security for the UK.

Question 2

Are there other ways in which integration could be improved?

The UK marine policy statement states that the marine plan authorities should 'seek to embrace the significant opportunities for co-existence of aquaculture and other marine activities in developing Marine Plans'

In order to promote this and other co-existence opportunities we believe there is a need to better align the timescales for this planning process with other marine developments in Wales (eg offshore renewable and marine conservation zones). We believe the different timescales involved will make co-existence much more difficult.

Question 3

What sectors do you think need to be included in the governance arrangements?

Industry, specifically fishing and aquaculture, which includes inshore, offshore and foreign fishing interests.

Question 4: What other key Welsh documents do you think need to be taken into account and why?

The Wales Fisheries Strategy: Implementation Plan 2009 makes several relevant points which we believe ought to be given greater prominence within the current document.

The vision of the Wales Fisheries Strategy is to:

'Support the development of viable and sustainable fisheries in Wales as an integral part of coherent policies for safeguarding the environment'

With regard to aquaculture it recognises the excellent prospects for growth and it's ability to supply high quality protein locally. It also says it wants to sustainably increase shellfish cultivation.

For capture fisheries it stresses the need for a sustainably managed, safe productive and profitable fleet and suggests that it should increase production by diversifying into other species.

It also stresses the importance of the industry to the socio-economics of Wales, how it can contribute positively to the environment and to communities in Wales.

All these points are important and should be recognised within the Welsh marine planning strategy.

Question 5

Do you think that there are currently any significant information or data requirements that we need to have in order to plan for the Welsh marine area?

There is a need to have much more accurate sea-bed data, coupled with fishing spatial and temporal data.

The recent scallop dredging environmental impact assessment in Cardigan Bay SAC demonstrated what little information we have on the seabed habitats, even in SACs designated to protect particular habitats.

The University of Wales assessment of offshore habitats in Cardigan Bay SAC showed the western part was dominated by gravel habitats and the eastern part of the SAC dominated by sand, thus disputing the SAC reef feature boundary. The assessment also concluded 'that natural processes outweighed the negative effects associated with scallop dredging within this highly dynamic area'.

(Ref: Hinz, H., Scriberras, M., Murray, L.G. Benell J.D. & Kaiser, M.J. (2010) Assessment of offshore habitats in the Cardigan Bay SAC (June 2010 survey). Fisheries & Conservation report No. 14, Bangor University)

Apart from vessels over 15 m (which are equipped with VMS) the spatial and temporal activity of vessels under 15 m has not been accurately mapped. Some mapping has occurred inshore, for example by CCW. However, this data requires quality assurance.

There is also very little data from foreign vessels.

Question 6

Could you help fill them, and how?

Fishermen could provide information on seabed type and the spatial and temporal distribution of fishing. However, trust within the industry for such work is low for a number of reasons. Firstly, communication with fishermen on the MCZ work and marine planning has been poor thus far and principally confined to the odd conference and paper driven consultation. This is not an effective means of communicating with working fishermen. Secondly, the closure of traditional scallop dredging grounds based on data which was not sufficiently robust. Thirdly, fishermen would not want to lose their competitive advantage by revealing their fishing grounds and practices to others. Data collected in confidence, owned and controlled by the industry or a body on behalf of the industry would be more appealing to fishermen.

Question 7

Do you think we need to plan on a more sub-national level?

The plans need to be flexible to take the dynamic nature of fishing into account. The spatial and temporal nature of fishing, the introduction of new fishing gear and fishing intensity can depend on many factors from year to year, including:

- environmental conditions (the seasonal appearance of commercial species);
- regulations (closures, quotas);
- increase in the population size of target species (such as the rise in inshore scallop stocks);
- market demand;
- new markets (for new and existing species); and
- technological developments (eg electro-fishing in South Wales)

The Welsh inshore fishing fleet is renowned for its versatility, partly due to its limited fishing range and desire to remain operating from home ports and landing places. Inshore industries, such as merchants and processors rely on local supply which in turn supports local communities. The survival of local fisheries, onshore industry and coastal communities will depend on a flexible and well informed planning system.

Question 8

If you do, what approach would you like us to take to sub-national marine planning and why?

Question 9

Are there different approaches that we could take?

Question 10

Are there other countries or authorities that we need to have close or formal relationships with?

A formal working relationship needs to be established with all EU Member States whose vessels operate in the inshore zone (those with historical fishing rights; Belgium, France and Ireland) and offshore zone.

Question 11

Do you agree with this approach?

The marine planning timescale does not synchronise with the timescales for other activities and spatial designations, such as offshore wind farms and MPA networks. As mentioned under Question 2, finding ways for marine activities to co-exist, as encouraged under the UK MPS, will be made even more difficult with misaligned planning timescales for different marine uses.

Question 12

How do you think we can make best use of existing coastal partnerships?

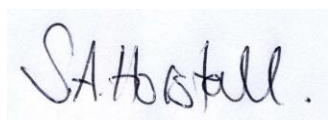
Fishermen's Associations are often overlooked and should be made more use of. In Wales, their members undertake a variety of mobile and static fishing operations which allows the associations to resolve spatial disputes.

Long term informal spatial agreements exist between static gear fishermen (often according to ports/landing places) and between static and mobile gear fishermen, especially inshore. Such spatial agreements need to be captured in the marine planning system to ensure fishermen and their communities are not unfairly disadvantaged.

As mentioned under Question 5, fishermen can supply data on fishing activity and seabed type required for effective marine planning. We recommend engaging and empowering the fishermen's associations in data collection, analysis and decision-making. The first task will be to improve communication.

I hope this response is useful, should you have any comments or queries, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink that reads "SA Hobbs". The signature is written in a cursive, slightly slanted style. The letters are connected, and there is a small dot at the end of the word "Hobbs".

S. A. Horsfall
Environmental Consultant