

Correspondence from Petitioner to Committee, 20 December 2012

Dear Sian,

Many thanks for your e-mail.

The only comment I wish to make regarding the Minister's letter to the Committee is that it disregards - or overlooks - the 7500 signature petition in favour of designating the current Skomer MNR as a highly protected MCZ which was presented to Jane Davidson on the passing of the Marine and Coastal Access Act in 2009, and which I resubmitted to John Griffiths in July 2012 (see attached letter). I do not resubmit the petition at this time as the Marine Branch doubtless has two copies on file but I am happy to do so if necessary.

I also take this opportunity of forwarding a further letter to the Minister, copied to William Powell as Chair of the Petitions Committee, concerning the Welsh Fishermen's Association report 'Striking the Balance' submitted as an alternative approach to the Government's highly protected MCZ proposals. This report was referred to by the Welsh Fishermen's Association in their evidence to the Environment and Sustainability Committee's Marine Policy Inquiry where it was discussed by members. I was compelled to write to the Minister as it is fundamentally flawed in several respects and misleading in others but appeared, and still appears, to be taken seriously and accepted without question or evidence for its claims.

I would be grateful if you would forward my comments and copies of the two attached documents to members of the Petitions Committee and would welcome the opportunity to provide any further information that I am able.

Regards,

Blaise Bullimore

John Griffiths
Minister for Environment and Sustainable Development
Welsh Government
5th Floor
Ty Hywel
Pierhead Street
Cardiff Bay CF99-1NA

30 July 2012

Dear Minister,

I have responded to the Welsh Government's consultation on potential site options for Welsh Waters consultation. Nonetheless, I also write to you to express my strong support for the government's policy to designate highly protected Marine Conservation Zones.

The planet's seas, including the Welsh marine environment, are under great pressure and are widely degraded. We are so familiar with the way things are now that we fail to recognise this and unless we explore the historical evidence we don't know what we have lost, or how less healthy our seas are now than they used to be.

Although 36% of Wales's sea is designated as European Marine Sites, these are multiple use areas that are not well enough managed and need far better protection. There is nowhere in Welsh waters that has been ever been fully protected from direct human impacts; even the protection offered by Skomer Marine Nature Reserve, Wales's only MNR, is strictly limited.

We need highly protected MCZs:

- to give marine wildlife at least a few places it can exist and thrive unmolested by people - we do so on land, there shouldn't be a lower standard for the sea;
- to allow parts of the marine environment to recover to a near natural state and to increase its resilience;
- to protect the marine ecosystem for the goods and services it gives us which we cannot exist without;
- to help us understand the effects of human pressures on the marine environment.

Evidence from round the world tells us that highly protected MPAs have disproportionately greater benefit than partial protection. However, we will never be in a position to show this in our own seas without actually designating and appropriately managing some.

It is with genuine regret that I have to complain that the first stage consultation process has been badly misjudged and mishandled. The inaccessible and ambiguous consultation document both unnecessarily alarmed and alienated many people and the government's public

engagement in support of the consultation failed to adequately clarify confusion or clearly answer questions, reconfirmed public suspicions and distrust, and allowed disinformation to thrive.

Having worked for over twenty-five years towards one day seeing the achievement of what are now to be known as HPMCZs I was delighted by the Welsh Government's proposals for MCZs in *Protecting Welsh Seas*. I am therefore devastated that the groundswell of opposition so unnecessarily generated by the misjudged and mishandled process has badly compromised the HPMCZ process.

I particularly welcome Skomer MNR being included in the list of potential sites, though it is unjust that Skomer is considered in the same way as the other potential sites since it has been a statutory Marine Nature Reserve for 22 years. During this time it has been well managed and monitored by a team of professional marine scientists, which I led from 1990 to 2005, and it has been remarkably well safeguarded in spite of the limited legal protection it enjoys.

I am aware that the Milford Haven Port Authority have objected to the Skomer designation on the false premise that it would risk preventing the Port's use of the currently licensed dredge spoil disposal sites, despite the Welsh Government's clear intent to avoid conflict with key government policies and constraints, the explicit identification of Skomer as not presenting any constraints, and in spite of the demonstration by comprehensive tracer studies funded by MHPA of no significant spoil deposition in the Skomer MNR from the current offshore disposal sites.

Wales needs better marine protection and highly protected MCZs need to be one of the key tools. I urge you not to allow the largely misinformed objections to divert you away from your government's policy. To do so, or to do nothing would be an unacceptable option risking increased damage to our marine environment. Instead, I urge government to learn from the errors of this first stage consultation and attempt to rebuild trust and understanding for the promised next stage.

Contrary to comments by the MHPA and others, designating HPMCZs would send a very positive message to business and the public, that Wales cares about its marine environment and is determined to look after and improve it for its intergenerational importance.

I particularly urge that you ensure that Skomer MNR becomes one of the sites to be designated as an HP MCZ and to that end I enclose a copy on CD-ROM of a 7,500 signature petition in support of the Skomer MNR which was first submitted to Jane Davidson in November 2009 at an event to celebrate the passage of the Marine and Coastal Access Act.

Yours sincerely,

Blaise Bullimore

John Griffiths
Minister for Environment and Sustainable Development
Welsh Government
5th Floor
Tŷ Hywel
Cardiff Bay
CF99 1NA

By e-mail to Correspondence.John.Griffiths@Wales.gsi.gov.uk

25 October 2012

Dear Minister,

Marine Conservation Zones – “Striking the Balance”

I strongly support the Government’s Highly Protected Marine Conservation Zone (HPMCZ) policy. However, I am becoming increasingly concerned about the risk it will be abandoned or emasculated in an attempt to appease the fishing industry by over-accommodation of fundamentally flawed proposals detailed in the Welsh Fishermen’s Association response to the MCZ consultation, *Striking the Balance*.

Striking the Balance does contain a number of positive messages and good points, but it is also extremely naïve, appears not to recognize the significant impacts that fishing has had on the marine environment and is unlikely to convince anyone with any real understanding of the Welsh marine environment or the pressures it faces. It is also difficult to take the positives at face value given the fishing industry’s years of resistance to engage with environmental conservation initiatives. Furthermore, there is a question how long the implied promises would be kept if the "threat" of HPMCZs were to go away; such previous experiences as the failed Lyme Bay voluntary co-management initiative suggests they might not last long.

Whilst this is not the place for a detailed critique of the document, I draw your attention to four of the document’s critical failings.

1) *It is predicated on a belief system rather than empirical evidence.* The phrase “WFA believe(s) ...” is used 17 times in the document without substantiation or evidence. Ironically the belief-based proposals are a stark contradiction to the fishing industry’s routine rejection of the empirical scientific evidence for conservation action and MCZs and its demands for ever more conclusive evidence for “proof”.

2) *It is an attempt to reinvent the wheel.* The management approach for the existing Marine Protected Area (MPA) network is already an integrated, multiple-use and ecosystem-based model; an approach required to meet, not least, the requirements of the EC Habitats Directive and the UK Habitat Regulations. HPMCZs are an essential part of the toolbox to deliver this, as is made clear in the recent CCW MPA management review.

The basic marine management model the document proposes and implies as novel is not new; not least it has been a sound principle at the heart of Wales’ European Marine Site management approach for over a decade. Certainly implementation has been a struggle, for many reasons, but in part because the fishing industry has opted to have minimal engagement with it and to argue against management for ecosystem protection.

3) *It is misleading.* Additional to the foregoing, the document misleads by implication. Two examples: the unsubstantiated claims of “serious economic, social and cultural impacts” on fishermen despite the likelihood of medium to longer term fisheries benefits; the systematic use of the term “low impact” in terms of fishing gears is unsubstantiated by evidence yet gives the impression that the gears mentioned, though not specified, are genuinely low impact rather than relatively lower impact than the most destructive fishing techniques.

4) *It promotes putting the fox in charge of the henhouse.* Whilst fishermen should indeed be involved in marine management, so should all users of and stakeholders in the sea. Fishermen should be accorded a role proportionate to the value of their industry, their track records, the impacts of their activities and their expertise. Taking these in turn:

Despite what seems to be a popular belief in the importance of Welsh fisheries, its value is vanishingly small compared to other marine sectors, not least tourism, as is borne out by the figures in the appended e-mail extracts from your Government’s Statistics Unit. Decisions should take this relative level of importance into account, particularly in context of the environmental impacts of fishing.

The track record of the fishing industry in terms of honesty, collaboration, compliance with regulation and forward-looking ecosystem management is, being very generous, questionable; from scallop and cockle fishing infringements and prosecutions to failures to observe voluntary measures in the Skomer Marine Nature Reserve the past performance of the industry is lamentable and does not inspire confidence in its capacity for self-control. Self regulation is demonstrably not a viable option; statutory regulation and enforcement is necessary to ensure compliance by both indigenous and foreign vessels.

There is no evidence that fishermen have either the necessary appropriate environmental management experience or expertise beyond their narrow field of interest, or the awareness of the marine science base. According them a lead position in MPA management would substantially risk further compromising the health of the marine environment and discrimination against other stakeholders.

The marine environment is far more than simply a resource for fishermen. A healthy marine environment is the planet’s life support system which we all have an intergenerational obligation to protect. HPM CZs are needed to begin to make a better contribution to delivering that obligation. I implore you not to allow yourself to be swayed into compromising essential long-term goals, now largely codified by the Marine Strategy Framework Directive, that will benefit all of society just to placate the immediate self-interests of a single small sector.

Yours sincerely,



Blaise Bullimore

cc Dafydd Ellis-Thomas AM, Chair Environment & Sustainability Committee Marine Policy Inquiry
William Powell, AM, Chair Petitions Committee
Paul Davies, AM, Preseli Pembrokeshire

Sent: 02 May 2012 15:02

To: Blaise Bullimore

Subject: RE: Sea fisheries statistics query

Hi Blaise,

There have been changes to the industrial classification system used since I last provided you with those statistics meaning that there has been some loss of detail (and some gains) - importantly fishing GVA is no longer available separately from regional accounts (the official GVA source).

Employment is still available (see table 5 here and it is division 3) - shows that employment in Wales in 2010 was around 400. <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-230519>

GVA, however, is available via the Annual Business Survey - note that it is 'approximate' GVA as it isn't exactly the same as GVA, these figures show that approximate GVA for fishing in Wales in 2008 was £13m and £11m in 2009 (so the numbers look similar to the old regional accounts data). The data are here: <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-249334>

Regards

John

Sent: 20 October 2010 08:51

To: Blaise Bullimore

Subject: RE: Sea fisheries statistics enquiry

Blaise,

We have data on the fishing sector for GVA. The latest data shows that in 2007 fishing contributed £13m to Wales'

GVA. <http://www.statswales.wales.gov.uk/TableViewer/tableView.aspx?ReportId=262>

We don't have any data that is published for employment in the fishing sector (as it is often grouped together with agriculture). I have had a look at the underlying data for this table on workplace

employment (<http://www.statswales.wales.gov.uk/TableViewer/tableView.aspx?ReportId=10928>) which shows that of the 42,000 in agriculture and fishing, around 500 jobs were in fishing in 2008.

Regards

John.