

[REDACTED]
[REDACTED]

William Powell, AM
Chair, Petitions Committee
National Assembly for Wales
Cardiff Bay CF99 1NA

By e-mail *via* Petitions Committee secretariat

30 September 2013

Dear Mr Powell,

Petition P-04-415 Marine Conservation Zones

Thank you for agreeing to reconsider my petition at your next meeting following the very late arrival prior to your last meeting on 24 September - for which I apologise - of copies of my two recent articles in *Natur Cymru*.

Whilst I am well aware of the Ministers announcement on MCZs and the withdrawal of the list of proposed highly protected MCZs, the issue has not gone away. His announcement included:

- a statement that he wants to understand more about the wide range of marine habitats and species that are already “protected”;
- a commitment to an assessment of current MPAs to identify if there are any gaps;
- a statement that he is aware of elements that may need strengthening;
- and recognition that existing sites need to be well-managed to achieve their conservation objectives.

To avoid unnecessary repetition, I refer you to reiterate the points I made in my letters to you and members of your Committee in my letters of 19 October 23012 and 29 January 2013. The points made therein describing the need for hpMCZs, criticising the process undertaken to date and providing some pre-emptive answers to the bullets above still stand.

Nevertheless I again stress that much of the argument presented in opposition to the MCZ proposals is based on false premises. What is perhaps worse, is that the Ministerial Task and Finish Group appeared not to take into account a great deal of the considerable volume information and evidence that already exists about our marine environment and the benefits of highly protected MPAs. In addition to leading to poorly informed recommendations this has apparently misled the Minister into understanding that far less is known about these issues than actually is.

Of course there will never be enough evidence to satisfy objectors or those who demand absolute proof before taking action. And, unless the capacity to document and understand the pressures and threats to designated features outpaces society's capacity for their exploitation, which is improbable, it will be always necessary for managers to make decisions on the best knowledge available despite its limitations and for users to accept that precautionary management may be necessary in circumstances where risk is probable albeit not demonstrated.

Addressing the second of the bullet points above, I ask you to note that this work has been done already by the Countryside Council for Wales and reported to Welsh Government. Commissioning yet another review smacks of simply kicking the issue into the long grass to avoid making what is expected to be a decision that is unpopular with one sectoral interest or another

If the Minister is indeed aware that measures need strengthening and really would welcome more evidence of payback from good management, he needs to bite the bullet and actually designate an hpMCZ adequately resourced to document the changes that occur with protection. The Skomer MNR is the only viable candidate since it comes with over two decades of monitoring and surveillance already in the bag.

I have commented previously on the naïve unquestioning welcome accorded to the Welsh Fishermens' Association report *Striking the Balance*. I will not rehearse all my criticisms of that document again now, but do reiterate that the positive proposals it makes are not new. An ecosystem approach, adaptive management and collaborative engagement with stakeholders have been fundamental to the approach adopted for well over a decade in the management of Wales' European Marine Sites – albeit with very limited success (Hatton Ellis et al 2012).

Ecosystem approach and adaptive management are both commendable goals and appear conceptually straightforward, but bring their own problems (e.g. UNEP 2011). Not only are the concepts not commonly understood, risking being misused, there seems limited agreement on how to implement them and they require a great deal of knowledge (e.g. Allen & Stankey, 2009; Arkema *et al.* 2006; Leslie & McLeod 2007; Tallis *et al.* 2010).

Ecosystem-based management requires precise knowledge and understanding of the spatial and temporal distribution of all the species, habitats and human interventions in the area of interest and how they all interact; such precision is rarely achievable. Likewise, it is easy to throw the phrase adaptive management into the mix because it sounds good and makes perfect sense, but it is very hard to achieve in the real world and without possibly prohibitive financial resources.

Ecosystem-based management must also take account of 'shifting baselines' - the tendency to continually consider increasingly degraded ecosystems long impacted by human activity as normal thereby gradually lowering expectations of what constitutes a healthy ecosystem (Dayton *et al.* 1998). Limited knowledge and understanding of historical ecosystem condition and human effects upon the ecosystem naturally makes it difficult to identify appropriate ecosystem objectives.

Wales still needs better protection for its marine environment and highly protected MCZs still need to be one of the key tools. Not to improve marine protection measures is an unacceptable option risking further and increased damage to our marine environment. Furthermore, designating hpMCZs would send a very positive message to business and the public: Wales cares about its marine environment and is determined to look after and improve it for its intergenerational importance.

Yours sincerely,

A handwritten signature in black ink that reads "Blaise Bullimore". The signature is written in a cursive style with a large initial 'B'.

Blaise Bullimore

Once again, I request that my address and other contact details are redacted before this letter is placed on the WG website. Thank you.

References

- Allen, C., Stankey, G.H., 2009. Adaptive Environmental Management: A Practitioner's Guide. CSIRO Publishing. ISBN: 978-90-481-2710-8 (Print) 978-1-4020-9632-7 (Online), pp 3-9.
- Arkema, K.K., Abramson, S.C., Dewsbury, B.M, 2006. Marine ecosystem-based management: from characterization to implementation. *Front Ecol Environ*, 4(10): 525–532.
- Dayton, P.K, Tegner, M.J, Edwards, P.B. and Riser, K.L. (1998) Sliding baselines, ghosts, and reduced expectations in kelp forest communities. *Ecological Applications*, 8(2): 309-322.
- Hatton-Ellis, M, Kay, L., Lewis, M., Lindenbaum, C., Wyn, G., Winterton, A., Bunker, A., Howard, S., Barter, G., Camplin M. & Jones, J., 2012 MPA Management Report 2: Evaluation of current MPA management in Wales. `report to Welsh Government from the Countryside Council for Wales.
- Leslie, H.M., McLeod, K.L., 2007. Confronting the challenges of implementing marine-ecosystem-based management. *The Ecological Society of America*, 5: 540-548.
- Tallis, H., Levin, P.S., Ruckelshaus, M., Lester, S.E., McLeod, K.L., Fluharty, D.L. and Halpern, B.S. 2010. The many faces of ecosystem-based management: Making the process work today in real places. *Marine Policy*, 34: 340-348.
- UNEP (2011): Taking Steps toward Marine and Coastal Ecosystem-Based Management - An Introductory Guide. UNEP Regional Seas Reports and Studies No. 189