Cynulliad Cenedlaethol Cymru | National Assembly for Wales
Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig | Climate Change, Environment and Rural Affairs Committee
Gwaith dilynol ar reoli Ardaloedd Morol Gwarchodedig yng Nghymru | Follow up work on Marine Protected Area management in Wales
Ymateb gan : Cyfoeth Naturiol Cymru
Evidence from : Natural Resources Wales

Assessing the progress made by the Welsh Government in taking forward the recommendations in the *Turning the Tide Report,* and in delivering MPA Network Management Action Plan 2018-19.

Thank you for allowing Natural Resources Wales (NRW) the opportunity to submit written evidence for your assessment on how Welsh Government are taking forward the recommendation in your Turning the tide Report and how they are delivering the MPA Network Management Action Plan 2018-19.

The statutory purpose of NRW is set out under the Environment (Wales) Act 2016. In the exercise of its functions under the Environment (Wales) Act 2016, NRW must pursue sustainable management of natural resources in relation to all of its work in Wales and apply the principles of sustainable management of natural resources in so far as that is consistent with the proper exercise of its functions. NRW's duty (in common with the other public bodies covered by the Well-Being of Future Generation (Wales) Act 2015) is to carry out sustainable development. This means, in general terms, looking after air, land, water, wildlife, plants, and soil to improve Wales' well-being, and provide a better future for everyone. NRW are also advisors to the Welsh Government on the natural heritage and resources of Wales and its coastal waters.

NRW is a Statutory Nature Conservation Body (SNCB) under the Conservation of Habitats and Species Regulations 2010 (as amended), as further amended by paragraph 189 of the Natural Resources Body for Wales (Functions) Order 2013. NRW's comments are therefore provided in the context of NRWs statutory purpose, functions, powers and duties.

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Introduction

The overall purpose of marine protected area (MPA) management is to achieve and sustain favourable condition of the features of MPAs. A well-managed network of MPAs has a positive impact on the health, functioning and overall resilience of the whole marine environment.

No single organisation has responsibility for management of MPAs in Wales. Management is a shared responsibility with the management of the different types of MPAs directly influenced by their associated legislative frameworks. Amongst MPA management authorities NRW does, however, have a particularly significant role due to:

- our remit to pursue the sustainable management of natural resources in relation to all our work,
- being the statutory nature conservation advisor to Government, and
- having a wide variety of relevant functions, including, for example: statutory advice (local and national), evidence, regulation, flood risk management and incident response.

As a result of our remit, NRW's work in MPA management is central in relation to evidence and advice on both the condition of MPAs, assessment of and advice on effective management, and delivery through a variety of advisory and regulatory functions. We therefore often lead work with other management authorities to advise on, support and deliver MPA management.

Although not always visible "on the ground", much of the management of protected sites is carried out through addressing the potential impacts of activities through both planning and regulatory processes.

Strategic planning processes such as the Welsh National Marine Plan, due for adoption this year, and various sectoral planning processes (e.g. The Crown Estate's planning processes for aggregates and renewable energy) set the context for the type of activity that is suitable and sustainable in Welsh waters and in different areas. The marine Area Statement also takes a whole-system approach and will identify the evidence and key opportunities for improving the management of natural resources across all of Welsh seas, including MPAs.

Activities that require permission to take place are regulated and assessed through various processes, including: Habitats Regulation Assessment (HRA), Environmental Impact Assessment (EIA), marine licencing, and a number of other consenting and decision-making processes. There are, however, activities that may impact on MPAs that are not normally regulated for which other management approaches are needed.

There are various challenges in detecting causal change in the marine environment, including the fact that is takes a significant amount of time for the result of any activity to be evidenced in a change to feature condition. Effective planning and assessment processes are therefore vital to ensure appropriate decision making up-front. There are also a number of processes underway to improve our understanding of condition over time, through monitoring and assessment.

NRW is committed to pursuing the sustainable management of marine natural resources (SMNR). Given the scale of the network, effective management of Welsh MPAs is a fundamental part of delivering SMNR for our coasts and sea. Addressed strategically at a network level, with clear prioritisation of activity and resources across the network, and fully integrated with whole-seas processes such as the marine area statement and WNMP, is, in NRW's view, the most effective way to secure sustained improvement in the management and condition of MPAs, and hence in the health and resilience of the wider marine environment.

(Please note: our response to question 1a is provided at the end of our comments, because our response to question 1a is in effect a summary of content across the other questions.)

1. Since the CCERA inquiry into Marine Protected Areas, and report to the Welsh Government in August 2017:
1b. Has the management of Welsh seas received sufficient resource and strategic direction?

Strategic direction
The overall strategic framework for MPA management is derived from the wider policy and legislative framework for sustainable management of the sea at an international, UK and Welsh level. This includes, for example, the Marine and Coastal Access Act (2009), the UK Marine Policy Statement, Wales National Marine Plan (WNMP), Oslo and Paris Convention (OSPAR), Marine Strategy Regulations (2010), the Environment (Wales) Act (2016) and the Well-being of Future Generations (Wales) Act (2015). Together this framework provides the requirements and drivers to:

- create an ecologically coherent and well-managed network of MPA,
- consider MPA site and network management in the planning and licensing process;
- apply an ecosystem-scale approach to considering pressures on and state of the marine environment; and
- consider MPA management in the context of the delivery of sustainable management of marine resources and wellbeing.

Within this framework, strategic direction on MPA management in Wales continues to be provided by Welsh Government. A central strategic message has been the focus on the *network* of MPAs and improving management in areas that can have the greatest impact on condition across the network.

A key vehicle for developing strategic direction for MPA management authorities is the Welsh Government run MPA Management Steering Group. It is important that authorities with statutory responsibilities in relation to the management of MPAs have a forum where they can collectively understand their respective statutory roles and responsibilities, and where they can begin to develop their understanding of these, at an MPA network scale.

The Steering Group has renewed its purpose and direction through the joint production of the MPA Network Management Framework and MPA Network Management Action Plan, building on the shared vision and objectives for the MPA network. The MPA Network Management Framework and particularly the Action Plan has provided a clear focus and stimulus for delivering effective management of our MPAs at the network scale. The annual action plan review and refresh cycle will continue this momentum.

Collaboration
The MPA Network Management Framework and Action Plan clearly articulates the key priorities for improving the management of the overall network to the wider community of stakeholders. Now that the Steering Group is established and has begun to fulfil part of the original intention of management authorities collectively improving their understanding of their roles and responsibilities, NRW, and other management authorities, recognise that there is a need to develop wider collaboration with stakeholders on MPA network management.

NRW and WG have identified the need to develop a vehicle for shared stakeholder liaison, to provide the opportunity to work collaboratively across the range of interrelated marine ecosystem resilience work areas, including:

- MPA network development and management,
- addressing marine ecosystem resilience through the marine Area Statement and other Environment Act requirements, and
- opportunities in Wales in relation to the Marine Strategy Framework Directive (MSFD) framework.

We will discuss with stakeholders, via the Wales Marine Advisory Action Group (WMAAG), how they wish to see this working in the coming months with a view to commencing in early summer. Initial discussions will be held at the WMAAG meeting in May.

Resources

Resources are always challenging especially in a climate of constraint across all parts of the public sector in Wales. Of critical importance, therefore, is the need to work in collaboration with Welsh Government and other partners to inform decisions on prioritisation of both work programmes and allocation of resources. For NRW, improving the condition of the network of MPAs through effective management continues to be a key priority in our marine programme and we are still committed to working with Welsh Government and partners to achieve this aim.

The production of the MPA Management Action Plan has facilitated the creation of a ring-fenced WG fund to support delivery of priority actions. For example, NRW has received additional funding for actions contained within the 2018/19 action plan, at a time when the evidence base to inform appropriate MPA management is one of the critical challenges in Wales and an area where NRW has a particular role and expertise.

NRW has also received funding from the Welsh Government-managed European Marine and Fisheries Fund (EMFF) for three projects linked to MPA management and marine biodiversity:

- Improving marine site level feature condition assessment reporting in Wales (£65,000)
- Biosecurity Planning for Pen Llyn a’r Sarnau SAC (£188,000)
- Native oyster restoration project (£144,000)

Although the funds are European, the selection of projects were judged against Welsh Government priorities, including those for MPAs.

At a strategic level WG has also been providing dedicated support to NRW since 2015 for capacity to help deliver a variety of priority work areas across the wider programme of marine work in Wales. This includes 2 posts that, amongst other areas of marine programme work, deliver MPA management evidence and action projects.

NRW is also going through a process of organisation design, part of which includes the creation of an Operational Marine Service, supported by, and working with, a strategic marine evidence and advice team. These changes will focus marine capacity creating a more flexible, adaptive and efficient service. The changes will help support MPA network management and also deliver an area focus with four

lead area advice officers providing local and operational advice for all MPAs in four areas that together cover all Welsh coasts and seas. As a result, NRW is delivering an area-based approach with the necessary strategic direction, support and advice. It is important to reiterate that MPA management is a shared responsibility and multiple funding streams and staff capacity in different organisations are utilised for MPA management in different forms. In Wales, best use of available resources is being made in relation to MPA management and more resources have been made available recently, as identified, above. Enhanced resourcing, if and as available, through various avenues, would allow more action across a wider range of areas, including against the investigative work still needed before correct action can be identified.

1. Since the CCERA inquiry into Marine Protected Areas, and report to the Welsh Government in August 2017:
1c. How has the condition of Wales' MPA's have changed?

There has been a significant positive development in the assessment of the features of MPAs in Wales with the publication of the indicative condition assessments for all features of European marine sites in January 2018. This involved the assessment of 128 individual features across 22 sites in Wales. The results of the indicative condition assessments can be seen in Annex 1 and summarised in Table 1

Table 1: Summary of indicative condition assessments

Condition	Confidence	Number	Percentage
Favourable	High	39	30%
Favourable	Medium	13	10%
Favourable	Low	7	5%
Unfavourable	High	32	25%
Unfavourable	Medium	15	12%
Unfavourable	Low	10	8%
Unknown	N/A	12	9%
Total		**128**	

There are various challenges in detecting causal change in the marine environment, and a number of processes underway to improve our understanding through monitoring and assessment, these are set out below.

Challenge of detecting causal change in the marine environment
As discussed with the Committee during the 2017 inquiry, it takes a significant amount of time for the result of any activity to be evidenced in a change to feature condition. As such, it is too early to say definitively whether any action in the MPA management action plan has led to improved condition – even major changes in activities can take many years to show a change in condition due to the time needed to show change and the difficulty of monitoring change. Ongoing monitoring is vital to detect change over these timescales.

Even when appropriate management has been put in place in the marine environment it takes time for positive effects to be recorded. For example, significant,

measures[1] have been put in place to control mercury inputs into the environment across the UK. However, many Water Framework Directive (WFD) waterbodies are still failing for mercury[2] due to its persistent nature and may do so for a number of years before the impact of the management measures are reflected in monitoring results. This delay in response time between management and positive impact on condition is reflected in the absence of a time limit in the Habitats Directive for achieving favourable conservation status.

Recovery rates can also be very variable for example in the Pen Llyn a'r Sarnau horse mussel reef results from monitoring show physical damage to the reef persisting for many years after the damage has occurred.

Whilst a number of management actions have been put in place to address the issues identified within the MPAs, the scale of the features, combined with the time lag between implementation of an action and it manifesting clear positive results and the nature of the monitoring in place (which due to the size and nature of the features entails a sampling approach only) can make it difficult to demonstrate the direct links between action and condition. Overall, therefore, despite some good examples of positive results where there is more intensive and directed monitoring (see box 1), we are still amassing the evidence on the effectiveness of management measures on site and network condition. As a result, we are focussing effort in many areas, and in the current MPA Network Action Plan, on work to better understand the impact of certain activities and where and what management may, or as importantly, may not, be needed.

Box 1: Skomer MCZ

Skomer is Wales' only Marine Conservation Zone (MCZ) at present. The MCZ is monitored and managed by a small team of people, whose local liaison and regular patrolling ensures that byelaws are upheld. The removal of King scallops by any means has been prohibited within the MCZ since 1990. Regular monitoring has shown the average density of King scallops has increased from around 1-1.2/100m^2 pre-designation (1984) to 35/100m^2 in 2016. There has been good recruitment into the population, especially since 2012. These results suggest that the management of scallops within the MCZ, consisting of the byelaws and the enforcement of these through patrols, has been effective.

Despite the challenges identified above, we can, through regulatory processes and associated advice, identify development that has been designed to avoid impacts on MPA condition, and hence has helped to safeguard the condition of features or prevent deterioration; this is a very significant aspect of effective MPA management.

There are also a number of monitoring and reporting processes that will together over time continue to improve our understanding of changes in the marine environment and changes in condition of MPAs. These are set out below.

[1] For example, the EU has banned the use of mercury in most products over the last ten years (http://ec.europa.eu/environment/chemicals/mercury/pdf/tackling_mercury_pollution_EU_and_worldwide_IR15_en.pdf)

[2] WFD Waterbody assessments 2015

UK marine biodiversity monitoring programme
The difficulty in monitoring change is one of the reasons why the JNCC and the Country Nature Conservation Bodies (CNCBs), including NRW, have been asked by the UK and devolved Governments to provide advice on options for a joint UK marine biodiversity monitoring programme. The objective of this programme is to fulfil nature conservation obligations for monitoring in a more coordinated, cost-effective manner, taking a risk-based approach to programme design, so that robust evidence for marine management purposes can be provided. The programme will monitor within and outside of protected sites.

Costed options for benthic monitoring in Wales are in the final stages of development. Once signed off, a costed plan for the final option preference will then be built into the business case being developed for all components at a UK scale (e.g. also including mammals, fish, birds, plankton and deep-sea habitats). These will then be presented through appropriate route(s) for ministerial approval; we await confirmation of the process and timescales at both UK and Wales levels. In the meantime, NRW continues to deliver out current marine monitoring programme, which contributes to various advice and assessment processes.

Developing the approach to site condition reporting
NRW will repeat site level condition assessments at a timescale that will, ideally, allow detection of some degree of change. The EMFF project *Improving marine site level feature condition assessment reporting in Wales* aims to develop indicators and a process for reporting on condition of features protected in Wales' network of MPAs.

The main activities of the project will be:

- The development of a series of reporting indicators, to allow the more efficient assessment and reporting of the condition of MPA features;
- The development of agreed guidance describing how site condition assessments will be carried out on all our MPAs; and
- The trial of the new methodology on a European marine site (EMS) in Wales.

The main achievement of the project will be:

- The ability to carry out site level condition assessments leading to a better understanding of the condition of our MPAs in Wales.

On completion of the project NRW would be happy to bring the results of this EMFF project to the Committee as well as details of how it will be implemented within NRW reporting duties.

Article 17 reporting

Since the MPA Management inquiry the UK has completed the country level assessments for Article 17 reporting. This reporting is based on Annex I and Annex II habitats and species across their range not just within sites and it may (and often does) give a different picture from site level feature condition assessments.

This round of Article 17 reporting has not been published or submitted to Europe yet and the assessments are not completed at the country level. However, after the Article 17 reports are submitted it is anticipated, depending on resources, that Wales

will produce some country level reports to aid understanding of the state of Annex I and Annex II habitats and species in Welsh waters. These can be made available to the Committee.

OSPAR MPA management effectiveness assessment
In 2018 the second OSPAR MPA management effectiveness assessment of Welsh EMS was carried out. This is part of a very high-level assessment of the management of MPAs across the whole of the OSPAR network. All Welsh sites were again assessed at a level of 'partial' in the overall assessment, which reflects the fact that some management mechanisms are in place but there is still progress to be made variably across the network. However, the prior completion of indicative feature condition assessments meant that we were able to give a more up to date response on whether the sites are in favourable condition. The "partial" result was in line with other sites across the UK and has fed into an OSPAR wide report.

State of Natural Resources Reporting
The second State of Natural Resources Report, due in December 2020, will provide an assessment of the extent to which the sustainable management of natural resources is being achieved. The marine component of SoNaRR 2 will incorporate information on MPA management and the feature condition into a wider assessment of ecosystem resilience and impacts on well-being.

2. Last year the Welsh Government's approach to the MPA Network Management was published. This included the 2018-2023 Framework and 2018-2019 Action Plan. Do these:
2a. Address the key issues of effective management of multi-use MPAs?

All MPAs in Wales are multi-use sites with activities assessed against the specific features of the sites. The MPA management framework is a useful summary of how our MPAs are currently managed and how the management authorities responsible for their management wish to manage them in the future. The framework highlights the types of activities that constitute MPA management and it allows the management principles developed by the Steering Group to be more widely disseminated.

Planning and regulation
The framework acknowledges the very significant but often undervalued role that planning and regulation play in the management of our sites.

Strategic planning processes such as the Welsh National Marine Plan, due for adoption this year, and various sectoral planning processes (e.g. The Crown Estate's planning processes for aggregates and renewable energy) set the context for the type of activity that is suitable and sustainable in Welsh waters and in different areas, including MPAs.

Assessment processes help modify activity and avoid impacts, for example, Strategic Environmental Assessment (SEA), Habitats Regulation Assessment (HRA) and Environmental Impact Assessment (EIA). This is an area of work with defined statutory advisory and regulatory roles, and it is not therefore something that wider stakeholders play a significant role in; hence it can be easy to overlook the significance for MPA management.

For activities within or adjacent to a European marine site (SAC or SPA) that require a permission (for example, planning application, marine licence or other consent), the consenting authority must carry out a HRA, to consider the effect the development or activity has on the features of the site(s) and the effect on the integrity of a site. As such, HRA is a very significant piece of regulatory assessment and one of the most important tools we have in the MPA management tool kit that also enshrines the precautionary principal in law. There are similar assessment requirements for MCZs, which will be equally relevant as Wales addresses the overall coherence of the network.

Priority actions

The MPA management framework also captures our previous advice to the CCERA Committee inquiry on work carried out as a result of NRW's LIFE N2K project for European marine sites (EMS) to prioritise the most important issues for these sites. As a consequence of this project work, five priority areas have been identified where it is recommended effort should be focused for maximum impact on the condition of the network. The five priority areas are:

- Access and Recreation – e.g. damage to habitats or disturbance of species;
- Water management and issues – e.g. coastal squeeze, flood and coastal erosion risk management;
- Pollution and waste – e.g. marine litter and diffuse water pollution;
- Marine fisheries – e.g. potting and dredging activities; and
- Invasive species – e.g. marine non-native species.

The MPA Network Management Action Plan was not designed to capture all actions that *could* be implemented across the network but instead focusses on those that address the priority network pressures, including across the above five themes. While this may appear to some as if there are gaps, it is important to target resources at actions where we have the evidence that they will make the most difference to the network. Some examples of action are provided in Boxes 2-5.

The management framework and action plan were designed to capture the actions that Welsh management authorities can address in Welsh waters. The action plan was not designed to capture the wide-ranging or global scale issues that need a UK, European or global response such as climate change or ocean acidification. The Action Plan does, however, include actions that Welsh management authorities can take that relate to wider global issues, where there is effective action that Welsh management authorities can take; for example, responding to coastal squeeze in Welsh waters – an impact that is a consequence of the combination of climate change and coastal protection. Also, under the planning and regulatory action, NRW advises on, and makes marine licensing decisions on, activities that are a response to climate change, such as renewable energy development. We therefore need to understand and address these global challenges and associated opportunities in order to take account of them and the wider global context in MPA management decisions.

The framework and action plan also recognise that sometimes actions need to be taken to gather evidence or to trial management approaches before the actual management measure to improve condition can be implemented. For example, we are in the process of investigating the distribution of a variety of non-licensable activities in order to understand the location of activities and the sensitivity of the

habitats to activities before on the ground management measures can be prioritised in the most important areas. Without this systematic, strategic evidence gathering we risk investing significant resource into management measures that may not be needed or may not be effective.

The actions chosen to be included in the action plan underwent a rigorous prioritisation protocol developed by the MPA Management Steering Group. Only actions which scored above an agreed threshold were included although other actions out-with those prioritised for the action plan can be included in the MPA Management Annual Report. A call for actions/projects which have improved management on sites has already been issued by the Steering Group to relevant stakeholders to allow for the inclusion of these project in the annual plan to be published in June 2019.

Site level actions
Although site level actions were not included in the main table of the MPA Management Network Action Plan, as they did not meet the network criteria, they were prominently included in an annex and the results of these actions will be included in the annual report. A number of the site level projects included were grant funded by NRW; for example, a project to establish recreational activity carrying capacity of the coast within MPAs and another project to increase nitrate and phosphate monitoring data using citizen-led science for the Milford Haven waterway to aid pollution reporting and help inform management (The SWEPT (Surveying the Waterway for Environmental Pollution Threats) project).

This approach acknowledges the significant impact that some site level actions can have locally, whilst recognising that at a network scale there may be wider priorities.

2. Last year the Welsh Government's approach to the MPA Network Management was published. This included the 2018-2023 Framework and 2018-2019 Action Plan. Do these:
2b. Support the management of Welsh MPAs to conserve Welsh marine biodiversity?

The Welsh MPA network is a key tool for delivering conservation of Welsh marine biodiversity alongside the new biodiversity duty in the Environment (Wales) Act, and the MPA Network Management Framework and Action Plan are, in NRW's view, key tools for facilitating improved management of Welsh MPAs.

Recent work has assessed how well the MPA network protects the range of marine biodiversity in Wales; to achieve this Welsh Government commissioned JNCC, with technical support from NRW, to undertake an analysis of the ecological coherence of the network of Welsh MPAs[3]. The analysis found that Welsh MPAs make a substantial contribution towards an ecologically coherent network and hence makes a significant contribution to the conservation of marine biodiversity in Welsh waters and wider biogeographic seas.
Beyond MPAs, mechanisms to support the wider conservation and sustainable management of marine biodiversity exist through the Marine Strategy Framework Directive, Welsh National Marine Plan (in draft) and Environment (Wales) Act,

[3] http://jncc.defra.gov.uk/pdf/JNCC_NetworkProgressWelshWaters_Final.pdf

including Area Statements. NRW's State of Natural Resources report (SoNaRR) published in 2016 also identifies pressures and opportunities for the sustainable management of all-natural resources. Key opportunities identified for sustainable management of marine natural resources include managed realignment at the coast, and a plan led integrated approach to management of marine activities with specific opportunities for sustainable growth in certain sectors in particular via the Welsh National Marine Plan.

We refer the Committee to our response to question 2a, above for details on priorities for management within MPAs. Some of the actions underway as a result of the action plan also cover the wider Welsh seas and the projects focussed on both management improvements as well as developing the evidence base to allow us to identify the priority actions to help improve condition across the network. Some of the projects carried out in this category are highlighted in the following case studies in Boxes 2- 5.

Box 2: The Non-licensable Activities Project

The overarching project aim focusses on the non-licenced activities of greatest concern at the network scale. It seeks to develop the evidence base on the spatial and temporal distribution, intensity and impacts of these activities on features protected in the network and will involve working with appropriate stakeholders to identify and implement feasible and effective management interventions (e.g. regulation, financial incentives, behavioural change, etc.), where required, to mitigate impacts.

The priority activities and associated actions at present are:

Anchoring, mooring and launching (recreational): Develop the evidence base for the location and intensity of this activity.

Recreational Sea Angling: Increase NRW's level of understanding of the impacts of this activity and how it links to MPA features.

Bait digging / collection of living resources: Develop NRW's understanding of the location and intensity of this activity in Wales and the potential for this activity to interact with 'sensitive' habitats.

Foot Access: Develop our understanding of the methods which could be used to estimate foot access intensity and behaviour on the intertidal areas of Wales and also gather improved data on sensitive areas for certain features of the MPA network.

Work on these activities took place from May 2018 to March 2019 and all are now complete. This work has developed our evidence base for high priority activities and will provide the future focus for investigation and / or the prioritisation and implementation of future management if it is considered necessary.

Box 3: The Marine Area Statement

The marine Area Statement (one of 7 being developed by NRW) is identified as an action in the MPA Network Management Action Plan, due to the potential for the process to support the sustainable management of MPAs and wider marine biodiversity. The purpose of Area Statements is to facilitate the implementation of Welsh Governments Natural Resources Policy (NRP), identifying opportunities and risks in that area for the sustainable management of natural resources, taking a place-based approach. As part of the process, emerging themes have been developed for each area.

The Marine Area Supporting Statement Emerging Themes are:

- Nature based solutions and adaptation in the coastal zone
- Implementation of marine planning
- Building the resilience of the marine environment

The themes all relate to the management of MPAs and the conservation of Welsh marine biodiversity.

Box 4: The Pen Llŷn a'r Sarnau Biosecurity Project

The Pen Llyn a'r Sarnau SAC biosecurity plan project, although based within a large SAC in North Wales, focusses on – biosecurity, to prevent the introduction and spread of invasive species. This will benefit the wider biodiversity of Welsh waters not just that within sites.

Project background and summary

Marine Invasive Non-Native Species (INNS) are a significant threat to global biodiversity and can have detrimental socio-economic impacts on activities such as fishing, shipping and aquaculture. Biosecurity measures can prevent the introduction and spread of INNS and limit the likelihood of a species entering an area in the first place; such measures are particularly important for marine ecosystems, where eradication and control techniques have been shown to be less effective.

This EMFF project will develop a biosecurity plan for the PLAS SAC and inform the longer-term implementation of effective biosecurity planning for Wales' network of marine protected areas. A crucial aspect of the project is to engage with key stakeholders such as local fishermen and the SAC Liaison Group. The project will be delivered in 3 work packages which will;

1) Gather evidence to underpin biosecurity planning for PLAS:

   - Assess and map the extent of INNS in the site
   - Assess potential impacts of INNS on features and fisheries
   - Investigate pathways of introduction and spread
   - Work with fishermen to review outputs from the evidence gathered

2) Develop a biosecurity plan for PLAS to minimise new anthropogenic introductions and reduce the spread of existing marine INNS to include:

   - Action plans for high-risk pathways of introduction and spread
   - Species Action Plans
   - Monitoring, management and awareness raising actions

3) Implement the biosecurity plan and monitor its effectiveness:

   - Workshops to promote the biosecurity plan
   - Work with Local Authorities to embed the plan through local planning policies and licences.
   - Lessons learnt exercise

Box 5: Assessing Welsh Fishing Activities project
Welsh Government and NRW are undertaking a comprehensive project to assess the impacts of all marine fisheries activities from licensed and registered fishing vessels on protected features of European Marine Sites in Wales.
There are 525 assessments to undertake which have been prioritised based on risk. NRW is leadings on the production of these fishing gear assessments. These assessment form part of the evidence base to support effective MPA management. To date all the highest priority assessments have been concluded.
Welsh Government will use the assessments to consider any management which may be required to address potential impacts on a site-by-site or all-Wales basis. The project's outputs will be used to support the aims of The Habitats Directives/Habitats Regulations, The Environment Act and The Wellbeing of Future Generations Act.

2. Last year the Welsh Government's approach to the MPA Network Management was published. This included the 2018-2023 Framework and 2018-2019 Action Plan. Do these:
2c. Take account of lessons learned from current MPA management activity in Wales (including designation, implementation and enforcement)?

As we communicated in our original response to the Committee there are a number of lessons to be learnt from the last ten years of MPA designation and management activity. In summary the key messages are that:

- management activity needs to be at the appropriate scale;
- stakeholders and management authorities need to be actively engaged; and
- available resources need to be prioritised to areas of greatest need / impact.

The MPA management framework and action plan have taken on these messages and tried to address them by:

- Recognising the fundamental importance of **engaging management authorities** in relation to their roles and responsivities, as a critical part of addressing effective MPA management
- Recognising the need for **good public engagement and involvement**, both locally and nationally for effective MPA management, with strong clear transparent messages though the framework and action plan highlighting the developed management principles as well as the network level objectives and vision.
- Identifying priority action at the **appropriate scale**. The Framework and Action plan recognises that local problems should be dealt with at the local level, whilst cross-site issues should be dealt with across the network allowing for efficiency of scale and also consistency of approach for national organisations engaged in using or manging multiple sites.
- With diminishing resources across the public sector, a difficult lesson has been that it is not possible to pursue all management action that could improve site condition. **Prioritisation of action** has been undertaken through the framework and action plan to ensure we can **focus available resources** and have a positive impact on issues that have the greatest impact on the condition of our MPAs.

- The Steering Group has also recognised the need to do more to **work collaboratively** and **engage wider stakeholders**. Minutes of the group are therefore available online, and now that the work has reached an appropriate stage, NRW and WG are in the process of establishing a shared stakeholder liaison mechanism, to provide the opportunity to liaise over a wide variety of interrelated marine ecosystem resilience work areas, including MPA management.
- Enabling MPA management to evolve and learn from previous work through a process of **adaptive management**. For example, one of the network level objectives set by the Group is on adaptive management:
  Objective V. Adaptive management Objective: *Management of the network is adaptive, incorporating change as new information becomes available. Environmental, social, cultural and economic information is used to support management, and is regularly updated and used for effective decision-making.*

Enforcement is challenging and costly in the marine environment. There are a variety of types of enforcement from formal enforcement or regulation (such as marine licenses and fisheries orders) to more informal local management. There is a specific fisheries enforcement action for Welsh Government (Action 9: Operate a risk-based approach to fisheries enforcement). Enforcement by other management authorities is also included in the general action on statutory responsibilities (Action 2: Deliver MPA management through regulatory consenting processes); this would include, for example, any enforcement that NRW carries out as it relates to our two cockle fisheries that NRW manages.

A number of activities that have the potential to impact on the condition of MPAs are unregulated and hence there is no formal associated enforcement; for these more adaptive local measures are needed and the non-licensable activities project is designed to identify where these are not in place but may be needed (see box 2).

2d. Take account of the implications of the UK 's decision to leave the European Union

The MPA Management Framework and Action Plan remains relevant in its current form pre and post EU Exit as it builds on and utilises powers and responsibilities that will be retained in their current form post EU exit. It is therefore a valid and key mechanism for securing improvement management of the network of MPAs in Wales post EU exit and the annual review cycle will allow new opportunities and issues to be addressed as they arise. Some wider consideration of the legislative framework for MPA management and EU exit is provided below.

The current legislative framework for MPAs provides the necessary tools for securing an ecologically coherent and well manged network. Various challenges around implementation of these measures remain but broadly the existing framework is fit for purpose. In exiting the European Union (EU), consistency and certainty will be important to ensure continued progress towards effective management of the network of MPAs as well as securing the network of sites that are predominantly created via EU Directives. Allied to this, exiting the EU should not result in any lowering of environmental standards/quality. The MPA Management Network Framework for Wales and its action plan assumes that this will be the case.

In Wales we benefit from strong domestic legislation that supports sustainable management of MPAs, including the Marine and Coastal Access Act, Environment (Wales) Act and WBFG Act. The WBFG ways of working, the primary purpose of sustainable management of natural resources (SMNR), and the new integrated management frameworks provided by the WNMP and Area Statements, collectively provide a key opportunity to enhance the sustainable management of MPAs and the wider marine environment. Legislative change post EU should maximise the opportunities the above legislation offers.

Exiting the EU will clearly present challenges for the management of MPAs given the predominance of EU derived legislation currently underpinning the management regime for MPAs. A statutory instrument the *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*[4] has, however, been made in order to affect the necessary amendments to existing statutory instruments which transpose the Nature Directives to ensure that they remain operable post European exit. There is also an opportunity, if carefully planned, to allow even further integration of existing management regimes together with the key domestic legislation referred to above, to create a stronger regime for the sustainable management of MPAs and marine natural resources.

There are still some concerns about gaps in governance. The Welsh Government are currently consulting on[5]:

- gaps in environmental principles and governance that may open up in Wales as a result of the UK's exit from the EU and
- how we provide a coherent and effective governance framework for the long-term improvement of our environment in line with our Wellbeing of Future Generations and Environment Act.

3. Do you have any other comments or issues you wish to raise that have not been covered by the specific questions?

Our response is as above.

[4] http://www.legislation.gov.uk/id/ukdsi/2019/9780111179512
[5] https://gov.wales/environmental-principles-and-governance-wales-post-european-union-exit

1. **Since the CCERA inquiry into Marine Protected Areas, and report to the Welsh Government in August 2017:**
    a. **What progress has been made by the Welsh Government against the recommendations in the Committee's report?**

CCERA Recommendation	Progress made
1. For Wales to realise the benefits of its MPAs, sites must be managed effectively. The Welsh Government must provide leadership on this matter by developing, as a matter of urgency, an MPA strategy and ensuring that all management authorities, including the Welsh Government, are actively engaged in MPA management and fulfilling their duties and responsibilities.	The MPA Network Management Framework and Action Plan provides the MPA strategy. This has been developed by the Wales MPA Management Steering Group which consists of representatives of MPA management authorities, led and Chaired by WG. The Framework and Action Plan: • provides a strategic steer to MPA management authorises; • makes it clear to management authorities what their duties are, as they relate to MPA management; • sets out what constitutes MPA management together with MPA management principles to follow in Wales; • identifies priority actions. For further details, please see the answer to 1b above.
2a. MPAs cannot be managed effectively without the appropriate level of resources, including funding and staffing. The Welsh Government must: a) ensure it has sufficient staffing to deliver its marine conservation responsibilities;	Welsh Government staffing and their internal resources are a matter for WG to respond to. In relation to wider resourcing for MPA management, please see the response to question 1b, under "resources".
2b. The Welsh Government must: b) bring forward proposals for funding an area-based approach, with each management area having a dedicated officer; and	This approach was considered and rejected by the MPA Management Steering Group due partly to funding issues, and partly due to the need to focus resources on work areas and projects that had the greatest potential to improve management and condition of features across the network, rather than a focus on management *structures*.

CCERA Recommendation	Progress made
	NRW is currently going through a process of organisation design, part of which includes the creation of an Operational Marine Service, supported by, and working with, a strategic marine evidence and advice team. These changes will focus marine capacity creating a more flexible, adaptive and efficient service. The changes will help support MPA network management and also deliver an area focus with four lead area advice officers providing local and operational advice for all MPAs in four areas that together cover all Welsh coasts and seas. As a result, NRW is delivering an area-based approach with the necessary strategic direction, support and advice.
2c. The Welsh Government must: c) ensure that Natural Resources Wales has sufficient resources to undertake its responsibilities for MPA management and improvements to the condition of the Wales Natura 2000 Network.	Resources are always challenging especially in a climate of constraint across all parts of the public sector in Wales. Of critical importance, therefore, is the need to work in collaboration with Welsh Government and other partners to inform decisions on prioritisation of both work programmes and allocation of resources. For NRW, improving the condition of the network of MPAs through effective management continues to be a key priority in our marine programme and we remain committed to working with Welsh Government and partners to achieve this aim. In terms of NRW's recent resources: • There have been some additional funding resources for MPA management activity recently which have supported NRW's MPA management work. • At a strategic level WG has also been providing support to NRW for 2 posts that, amongst other areas of wider of marine programme work, deliver MPA management evidence and action projects. • NRW is also going through a process of re-design and this will provide local advisory support for MPA management in four areas that cover the whole of Welsh coasts and inshore seas. Further details are in the response to question 1b and 2a.

CCERA Recommendation	Progress made
3. The Welsh Government must increase public awareness of MPAs and improve its engagement with stakeholders and the public. It must also operate in a more transparent and efficient way, publishing information about the activities of the specialist groups it leads and ensuring stakeholders are fully engaged in the development of the MPA strategy.	In this first phase of developing and delivering the MPA Network Management Framework and Action Plan the focus has been on improving the understanding of management authorities of their responsibilities, and galvanising collective action. During this process, WG have published the minutes and a summary of meetings for the MPA Management Steering group and presented progress to WMAAG. The management framework and Action Plan were published online and circulated by the secretary of state to the relevant management authorities across Wales. The MPA Network Management Framework and Action Plan clearly articulates the key priorities for improving the management of the overall network to the wider community of stakeholders. A variety of stakeholders are also involved in direct delivery of MPA management action, both nationally and locally. Now that the Steering Group is established and has begun to fulfil part of the original intention, NRW, WG, and other management authorities, recognise that there is a need to develop wider collaboration with stakeholders on MPA network management. NRW and WG have identified the need to develop a vehicle for shared stakeholder liaison, to provide the opportunity to work collaboratively across the range of interrelated marine ecosystem resilience work areas, including: • MPA network development and management, • addressing marine ecosystem resilience through the marine Area Statement and other Environment Act requirements, and • opportunities in Wales in relation to the Marine Strategy Framework Directive (MSFD) framework. We will discuss with stakeholders, via the Wales Marine Advisory Action Group (WMAAG), how they wish to see this working in the coming months with a view to commencing in early summer. Initial discussions will be held at the WMAAG meeting in May.

CCERA Recommendation	Progress made
4. The Welsh Government should develop an enforcement strategy, based on risks, which addresses all pressures on MPAs - including water quality; litter; recreational pressures; fisheries and unregulated marine resource gathering - and should move quickly to implement management measures in MPAs where there are known risks.	Enforcement is challenging and costly in the marine environment. There are a variety of types of enforcement from formal enforcement or regulation (such as marine licenses and fisheries orders) to more informal local management. The MPA network management action plan has a number of actions to help address these issues. Please see our response in 2a and 2b above and information on the non-licensable activities project in box 2.
5. The availability of data, evidence and research is central to MPA policy development and management. The Welsh Government should establish a Wales marine science partnership to bring together industry, academia and stakeholders. The Welsh Government must also ensure it has in place effective data and research for MPA management, including monitoring and surveillance.	The MPA management action plan has a number of actions relating to improving the collection and processing of marine data as it pertains to MPA management. For more information please see our response to 1c above.
6. When designating MPAs in the future, the Welsh Government should set out the resources necessary for the associated management, monitoring, surveillance and enforcement that site(s) will require and how such resources will be provided.	Welsh Government are working on an approach for the designation of MCZs in Wales, more information will be available on this approach as it progresses.
7. The Welsh Government should define its understanding of an Ecologically Coherent Network of MPAs in Welsh waters and work with stakeholders to address gaps in the network.	A recent report by JNCC and NRW, commissioned by WG, has found that Welsh MPAs make a substantial contribution towards an ecologically coherent network and hence make a significant contribution to the conservation of marine biodiversity in Welsh waters and wider biogeographic seas. This report sets out criteria that define an ecologically coherent network of MPAs. Please see our answer in 2b for more information.
8. A cornerstone of MPA management is recourse and access to justice. The Welsh Government must ensure that future	The Welsh Government are currently consulting on: • gaps in environmental principles and governance that may open up in Wales as a result of the UK's exit from the EU; and

CCERA Recommendation	Progress made
arrangements in are in line with the Aarhus Convention and not prohibitively expensive for applicants.	• how they can provide a coherent and effective governance framework for the long-term improvement of Wales environment in line with the Wellbeing of Future Generations and Environment (Wales) Act. Please see our response to 2d for more information.
9. The Welsh Government must assess the likely impact of exiting the European Union on Welsh MPAs, including whether designation and management can be harmonised, and commit to no loss of protection under future arrangements. It must also seek agreement with the UK Government about how marine environmental protections will be managed coherently in cross-border marine areas.	Exiting the EU will clearly present challenges for the management of MPAs given the predominance of EU derived legislation currently underpinning the management regime for MPAs. A statutory instrument the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 has, however, been made in order to affect the necessary amendments to existing statutory instruments which transpose the Nature Directives to ensure that they remain operable post European exit. Please see our response to 2d for more information.
10. The Welsh Government should ensure that reporting of Welsh MPA site condition and status currently required under European legislation is undertaken regularly after the UK exits the European Union, with reports published and provided to management authorities in a timely manner.	A point of clarification, there is no requirement to report on site condition under European legislation. There is a requirement to report on the status of habitats and species in Annex I and Annex II of the Habitats Directive, this is for the habitat or species across its range in the member state it does not consider site level condition. However, there is a new duty in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, Regulation 6a which calls for the publication for a report on the implementation of the measures for the conservation of the natural habitat types listed in Annex I to the Habitats Directive and species listed in Annex II to that Directive. This report must be published every six years from exit day. Under 6a (4) The report, must be submitted in draft to the devolved administrations for verification. NRW published a full suite of site condition reports in 2018 and is actively working on an ongoing process.

CCERA Recommendation	Progress made
	See response to question 1c for more details.
11. The Welsh Government should work with the UK Government to ensure Wales' fisheries resources and the interests of the Welsh fleet are fully protected in Brexit negotiations. Future Welsh fisheries management arrangements should take into account the Wales National Marine Plan and a Welsh MPA strategy.	NRW is committed to working collaboratively with, supporting and advising the Welsh Government to ensure that Wales' fisheries resources and the marine environment are sustainably managed for both present and future generations. Of particular relevance to MPA management is NRW's role in delivering assessments of potential impacts from fishing gear types on MPA features as part of the Assessing Welsh Fishing Activity project (See Box 5 for more details). NRW is engaged in dialogue with the Welsh Government in relation its anticipated Brexit and Ours Seas consultation, in acknowledgement of the role that the consultation is anticipated to play in shaping future Welsh Fishing policy in a post-Brexit context.
12. The Welsh Government must explain how it intends to address the potential shortfall in funding for MPA work that is currently met by EU funds, such as the European Maritime and Fisheries Fund and LIFE-Nature.	WG is best placed to respond to this recommendation. NRW has been assured that the current EU-funded projects that NRW is involved in will continue to be funded post EU exit until their completion date; this includes a number of MPA management related projects.

Annex 1: Results of indicative condition assessments by site and feature

No.	Site	Feature	Overall Indicative Assessment	Overall Confidence Level
1	Dee SAC	Mudflats and sandflats not covered by seawater at low tide	Favourable	Low
2	Dee SAC	*Salicornia* and other annuals colonising mud and sand	Favourable	Medium
3	Dee SAC	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Favourable	Medium
4	Dee SAC	Estuaries	Unfavourable	Low
5	Dee SAC	River lamprey (*Lampetra fluviatilis*)	Unfavourable	High
6	Dee SAC	Sea lamprey (Petromyzon marinus)	Unfavourable	High
7	Menai Strait & Conwy Bay SAC	Mudflats and sandflats not covered by seawater at low tide	Favourable	Medium
8	Menai Strait & Conwy Bay SAC	Reefs	Favourable	Medium
9	Menai Strait & Conwy Bay SAC	Sandbanks which are slightly covered by seawater all the time	Favourable	Low
10	Menai Strait & Conwy Bay SAC	Large shallow inlets and bays	Unfavourable	Medium
11	Menai Strait & Conwy Bay SAC	Submerged or partially submerged sea caves	Unknown	Not Applicable
12	Anglesey coast: Saltmarsh	*Salicornia* and other annuals colonising mud and sand	Favourable	Medium
13	Anglesey coast: Saltmarsh	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Unfavourable	Medium
14	Anglesey coast: Saltmarsh	Estuaries	Favourable	Low
15	Anglesey coast: Saltmarsh	Mudflats and sandflats not covered by seawater at low tide	Favourable	Low
16	Pen Llyn a’r Sarnau SAC	Reefs	Unfavourable	Low
17	Pen Llyn a’r Sarnau SAC	Large shallow inlets and bays	Favourable	Low

No.	Site	Feature	Overall Indicative Assessment	Overall Confidence Level
18	Pen Llyn a'r Sarnau SAC	Sandbanks which are slightly covered by seawater all the time	Unfavourable	Low
19	Pen Llyn a'r Sarnau SAC	Estuaries	Unfavourable	Medium
20	Pen Llyn a'r Sarnau SAC	Coastal lagoons	Unfavourable	High
21	Pen Llyn a'r Sarnau SAC	Mudflats and sandflats not covered by seawater at low tide	Unfavourable	Low
22	Pen Llyn a'r Sarnau SAC	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Unfavourable	High
23	Pen Llyn a'r Sarnau SAC	*Salicornia* and other annuals colonising mud and sand	Unfavourable	High
24	Pen Llyn a'r Sarnau SAC	Submerged or partially submerged sea caves	Unknown	Not Applicable
25	Pen Llyn a'r Sarnau SAC	Grey seal (*Halichoerus grypus*)	Favourable	Medium
26	Pen Llyn a'r Sarnau SAC	Bottlenose dolphin (*Tursiops truncatus*)	Favourable	Medium
27	Pen Llyn a'r Sarnau SAC	Otter (*Lutra lutra*)	Favourable	Medium
28	Cardigan Bay SAC	Bottlenose dolphin (*Tursiops truncatus*)	Favourable	Medium
29	Cardigan Bay SAC	Grey seal (*Halichoerus grypus*)	Favourable	Low
30	Cardigan Bay SAC	Reefs	Favourable	Medium
31	Cardigan Bay SAC	Submerged or partially submerged sea caves	Unknown	Not applicable
32	Cardigan Bay SAC	Sandbanks which are slightly covered by seawater all the time	Unfavourable	Low
33	Cardigan Bay SAC	River lamprey (*Lampetra fluviatilis*)	Favourable	High
34	Cardigan Bay SAC	Sea lamprey (*Petromyzon marinus*)	Unknown	Not applicable
35	Limestone coast of SW Wales	Submerged or partially submerged sea caves	Unknown	Not Applicable
36	Pembrokeshire Marine SAC	Large shallow inlets and bays	Unfavourable	Medium

No.	Site	Feature	Overall Indicative Assessment	Overall Confidence Level
37	Pembrokeshire Marine SAC	Estuaries	Unfavourable	High
38	Pembrokeshire Marine SAC	Reefs	Unfavourable	Medium
39	Pembrokeshire Marine SAC	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Unfavourable	Medium
40	Pembrokeshire Marine SAC	Mudflats and sandflats not covered by seawater at low tide	Unfavourable	High
41	Pembrokeshire Marine SAC	Coastal lagoons	Unfavourable	High
42	Pembrokeshire Marine SAC	Submerged or partially submerged sea caves	Unknown	Not Applicable
43	Pembrokeshire Marine SAC	Sandbanks which are slightly covered by seawater all the time	Unfavourable	Low
44	Pembrokeshire Marine SAC	Grey seal (*Halichoerus grypus*)	Favourable	Medium
45	Pembrokeshire Marine SAC	Otter (*Lutra lutra*)	Favourable	High
46	Pembrokeshire Marine SAC	Shoredock (*Rumex rupestris*)	Favourable	High
47	Pembrokeshire Marine SAC	Allis shad (*Alosa alosa*)	Favourable	High
48	Pembrokeshire Marine SAC	Twaite shad (*Alosa fallax*)	Favourable	High
49	Pembrokeshire Marine SAC	River lamprey (*Lampetra fluviatilis*)	Unfavourable	Medium
50	Pembrokeshire Marine SAC	Sea lamprey (*Petromyzon marinus*)	Unfavourable	Medium
51	Kenfig	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Unfavourable	Medium
52	Cemlyn	Coastal lagoons	Favourable	High
53	Carmarthen Bay & Estuaries SAC	Estuaries	Unfavourable	Medium
54	Carmarthen Bay & Estuaries SAC	Mudflats and sandflats not covered by seawater at low tide	Unfavourable	Medium

No.	Site	Feature	Overall Indicative Assessment	Overall Confidence Level
55	Carmarthen Bay & Estuaries SAC	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Unfavourable	High
56	Carmarthen Bay & Estuaries SAC	*Salicornia* and other annuals colonising mud and sand	Favourable	Medium
57	Carmarthen Bay & Estuaries SAC	Large shallow inlets and bays	Unfavourable	Medium
58	Carmarthen Bay & Estuaries SAC	Sandbanks which are slightly covered by seawater all the time	Unfavourable	Low
59	Carmarthen Bay & Estuaries SAC	Otter (*Lutra lutra*)	Favourable	Medium
60	Carmarthen Bay & Estuaries SAC	Allis shad (*Alosa alosa*)	Unfavourable	Low
61	Carmarthen Bay & Estuaries SAC	Twaite shad (Alosa fallax)	Unfavourable	Low
62	Carmarthen Bay & Estuaries SAC	River lamprey (*Lampetra fluviatilis*)	Unfavourable	High
63	Carmarthen Bay & Estuaries SAC	Sea lamprey (*Petromyzon marinus*)	Unfavourable	High
64	Severn SAC	Sea lamprey (*Petromyzon marinus*)	Unfavourable	High
65	Severn SAC	River lamprey (*Lampetra fluviatilis*)	Unfavourable	High
66	Severn SAC	Twaite shad (*Alosa fallax*)	Unfavourable	Low
67	Severn SAC	Estuaries	Unfavourable	Medium
68	Severn SAC	Mudflats and sandflats not covered by seawater at low tide	Unfavourable	Medium
69	Severn SAC	Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*)	Unfavourable	Medium
70	Severn SAC	Reefs	Unknown	Low
71	Severn SAC	Sandbanks which are slightly covered by seawater all the time	Favourable	Low
72	Dee Estuary	Sandwich tern (passage)	Favourable	High
73	Dee Estuary	Little tern (breeding)	Favourable	High
74	Dee Estuary	Common tern (breeding)	Unfavourable	High
75	Dee Estuary	Bar- tailed godwit	Unfavourable	High
76	Dee Estuary	Redshank (passage)	Favourable	High
77	Dee Estuary	Shelduck (wintering)	Unfavourable	High

No.	Site	Feature	Overall Indicative Assessment	Overall Confidence Level
78	Dee Estuary	Teal (wintering)	Unfavourable	High
79	Dee Estuary	Pintail (wintering)	Unfavourable	High
80	Dee Estuary	Oystercatcher (wintering)	Favourable	High
81	Dee Estuary	Grey Plover (wintering)	Unfavourable	High
82	Dee Estuary	Knot (wintering)	Favourable	High
83	Dee Estuary	Dunlin (wintering)	Unfavourable	High
84	Dee Estuary	Black-tailed godwit (wintering)	Favourable	High
85	Dee Estuary	Curlew (wintering)	Favourable	High
86	Dee Estuary	Redshank (wintering)	Favourable	High
87	Dee Estuary	Assemblage	Favourable	High
88	Liverpool Bay	Red-throated diver	Favourable	High
89	Liverpool Bay	Common scoter	Favourable	High
90	Liverpool Bay	Assemblage	Unknown	High
91	Traeth Lafan	Oystercatcher (wintering)	Favourable	High
92	Traeth Lafan	Curlew (wintering)	Favourable	High
93	Traeth Lafan	Great-crested Grebe (wintering)	Unfavourable	High
94	Traeth Lafan	Red breasted merganser	Unknown	High
95	Traeth Lafan	Redshank	Favourable	High
96	Anglesey terns	Arctic Tern	Favourable	High
97	Anglesey terns	Common Tern	Favourable	High
98	Anglesey terns	Roseate Tern	Unfavourable	High
99	Anglesey terns	Sandwich Tern	Favourable	High
100	Aberdaron Coast and Bardsey Island	Manx shearwater	Favourable	High
101	Northern Cardigan Bay	Red throated diver (wintering	Unknown	Not applicable
102	Skomer Skokholm and the seas off Pembrokeshire	Storm petrel	Unknown	Not applicable
103	Skomer Skokholm and the seas off Pembrokeshire	Lesser black-backed gull	Unfavourable	High
104	Skomer Skokholm and the seas off Pembrokeshire	Manx shearwater	Favourable	High
105	Skomer Skokholm and the seas off Pembrokeshire	Puffin	Favourable	High
106	Skomer Skokholm and the seas off Pembrokeshire	Assemblage	Favourable	High

No.	Site	Feature	Overall Indicative Assessment	Overall Confidence Level
107	Grassholm	Gannet	Favourable	High
108	Burry Inlet	Oystercatcher	Unfavourable	High
109	Burry Inlet	Knot	Favourable	High
110	Burry Inlet	Pintail	Favourable	High
111	Burry Inlet	Shoveler	Unfavourable	High
112	Burry Inlet	Teal	Favourable	High
113	Burry Inlet	Wigeon	Unfavourable	High
114	Burry Inlet	Turnstone	Unknown	High
115	Burry Inlet	Dunlin	Favourable	High
116	Burry Inlet	Curlew	Unfavourable	High
117	Burry Inlet	Grey Plover	Favourable	High
118	Burry Inlet	Redshank	Favourable	High
119	Burry Inlet	Shelduck	Unfavourable	High
120	Burry Inlet	Assemblage	Favourable	High
121	Carmarthen Bay	Common scoter	Favourable	High
122	Severn Estuary	Bewick swan	Unfavourable	High
123	Severn Estuary	European White-fronted goose	Unfavourable	High
124	Severn Estuary	Dunlin	Unfavourable	High
125	Severn Estuary	Redshank	Favourable	High
126	Severn Estuary	Shelduck	Favourable	High
127	Severn Estuary	Gadwall	Unfavourable	High
128	Severn Estuary	Assemblage	Favourable	High