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Consultation – summary of responses

Marine Conservation Zones (MCZs)

Potential Site Options for Welsh Waters

June 2013

MARINE CONSERVATION ZONES – POTENTIAL SITE OPTIONS FOR WELSH WATERS

SUMMARY OF CONSULTATION RESPONSES

INTRODUCTION

The Marine Conservation Zones – Potential Options for Welsh Waters consultation was launched on 19 April 2012 and closed on 31 July 2012. The consultation presented the science behind 10 potential highly protected site options. No decisions had been made on whether any of the options should go forward for designation, or what their size or boundaries might be. The key aim of the consultation was to gather more information and views from people about each of the 10 options. Six questions were asked about each potential site.

The consultation responses provided a wealth of information about the social, cultural and economic make up of coastal communities across Wales, and the potential implications for them of highly protected sites. The consultation generated strong and contrasting views about how best to take forward MCZs in Wales.

OVERVIEW OF RESPONSES

6,712 responses were received during the consultation period.

There were 557 responses from organisations and 6155 from private individuals. A breakdown of the responses is provided below (Table 1.) A list of the organisations that responded to the consultation is provided at Annex A.

Table 1 - Number of Responses by Category

Category of respondent	Number of responses
Private individuals	6155
Business and/or representative	199
Recreational interest and/or representative	247
Local government and/or representative	43
Third sector/other ¹	32
Environmental/conservation body	19
National government and/or representative	11
Public sector	6

Campaign responses

The majority of consultation responses were prompted by four major campaigns, resulting in submission of a generic response from each campaign supporter – 79% of all responses were of this nature. They can be summarised as follows:

- 75% stated support for the designation of highly protected sites in Welsh waters, but expressed concern that current MPAs were failing due to a lack of effective management and enforcement.
- 12% stated support for highly protected sites and for all 10 site options to be designated, but expressed concern about a lack of commitment towards a coherent network and adequate resources for the marine environment.
- 8% supported highly protected sites as a step towards a coherent network of sites, providing they were placed appropriately. These responses expressed concern about a lack of action to complete the network (in particular the lack of sites for resting and foraging seabirds) and ineffective management.
- 5% opposed all 10 site options in the consultation, questioning the need for highly protected sites and evidence of their ecological benefits.

¹ “Other” includes academic institutions, unions and community groups

Use of the proforma

Only 4% of all respondents used the proforma provided. As the responses did not cover all the consultation questions, they were logged individually by theme and key messages rather than by analysis of each question.

Petitions

During the course of the consultation the following petitions were submitted to the Welsh Government and the National Assembly for Wales Petitions Committee:

- A petition of 6,501 signatures opposing all 6 MCZ site options in North Wales.
- A petition of 586 signatures urging the Welsh Government not to include the three proposed sites in Pembrokeshire.
- A petition of 298 signatures endorsing the Welsh Government's policy to designate highly protected MCZs and supporting Skomer Marine Nature Reserve, as Wales's only marine reserve, being given a higher level of protection.
- A petition of 1,179 signatures opposing the current Welsh Government proposals for highly protected MCZs.

THE KEY THEMES

The responses were grouped into key themes and are summarised below:

1. The need for highly protected sites
2. The impact on local communities
3. The process to date
4. Priorities and affordability

1. The need for highly protected sites

Although secondary to the purpose of the consultation, the Welsh Government's decision to implement a high level of protection on any designated site was the most contentious area of the proposals.

70% of all responses stated support for the highly protected approach; of these, 98% were campaign responses from private individuals. Views and comments included with these responses were that:

- It is necessary to allow the marine environment the opportunity to recover from direct human exploitation;
- HPMCZs are needed to protect and conserve Wales' most precious and fragile marine habitats;
- HPMCZs are an important part of the network providing they are in the right location and for the right reasons; and
- Although there was general support for the approach, there were concerns that the focus on HP is detracting from the bigger issue of effective marine management in Wales.

13%² of responses stated opposition to the highly protected approach – 28% of these were generic campaign responses. Views and comments included with these responses were that:

² The remaining 17% of responses fell into two further categories: no view stated, and support for conservation measures but not the highly protected approach. Most of these latter responses suggested alternative methods for protecting the marine environment.

- There is no justification for introducing a blanket approach to protection, rather than site-by-site risk based/ feature based approach;
- There is a lack of evidence to suggest sites would foster an increase in biodiversity and justify the socio-economic costs; and
- There is a lack of evidence to justify banning sustainable activities.

An overview of general views relating to the highly protected approach by category of respondent/sector is provided at Table 2.

Table 2 - An overview of support or opposition to the highly protected approach by sector

Category	Support	Opposition	Not Stated	Total
Private Individual	4647	556	952	6155
Business and/or Representative	3	141	55	199
Recreation and/or representative	4	153	90	247
Local Government and/or representative	2	17	24	43
Third Sector/ other	4	14	14	32
Environment or conservation body	4	1	14	19
National government and/ or representative	3	3	5	11
Public Sector	0	1	5	6

2. The impact on local communities

Many respondents raised concerns about the impact the sites would have on local economies because of access restrictions and no longer being able to use the areas to make a living. The consultation responses highlighted that opportunities for alternative employment within small coastal communities are scarce. The potential

negative impact on the inshore fishery in Wales and associated businesses was a common concern, with concern that the loss of fishing grounds could lead to a poorer understanding of the marine environment in coastal communities. It was felt by many respondents that there would be an associated loss of historic and cultural links.

Residents of communities reliant on the tourism and marine leisure industries raised concerns that their communities would be seen as no-go areas and, as such, that tourists would decide to go elsewhere³. Some claimed that the impacts on local communities would be unacceptable for the sake of an ecological experiment.

There was criticism of the Welsh Government for not highlighting the benefits to society of highly protected areas, and therefore failing to present a good case.

Some respondents felt that a disproportionate weighting had been given to socio-economics at the first filter for site selection, which resulted in some important marine areas being avoided in favour of large industries. Others stated that the socio-economic impacts should have been considered from the beginning, alongside the ecological information.

3. The process to date

Many respondents, both in support of and against HPMCZs, criticised the consultation process. Views and comments included that:

- There was doubt regarding the ecosystem benefits from the potential sites, as they had been selected for being biologically healthy and resilient;
- There was confusion over the need to further protect healthy sites;
- There was confusion over the need to manage/restrict activities that had been coexisting within the sites without any deterioration in habitat quality;

³ This in part was based on a misunderstanding about the activities that would be restricted. For example, some thought the high level of protection would result in beach closures and navigation of vessels being prohibited.

- Some respondents were critical of using heterogeneity to select sites, as it had skewed selection towards the coastal areas and areas of conflict with human activity;
- Sites were being set up to fail – a small number of small sites being unlikely to deliver any meaningful ecosystem benefits;
- There was a lack of engagement with stakeholders and local communities from an early stage;
- The consultation document was too long, too detailed and too complex;
- The lack of bilingual documentation and hard copies was criticised, as was the delay in publishing frequently asked questions; and
- The lack of clarity on what constituted damaging and disturbing activities increased uncertainty for communities, and resulted in confusion about the activities affected.

4. Priorities and affordability

Many respondents questioned the Welsh Government's priorities, arguing that before proposing new sites it should focus limited resources and effort on effectively managing and enforcing its existing suite of marine protected areas.

Concerns were raised about the Welsh Government's ability to enforce and resource these new sites, with examples given of illegal fishing activity going on without consequence – even when reported. There was some criticism that the enforcement costs for any new sites had not yet been calculated.

There was criticism towards the lack of resource for management of the marine environment, compared to the terrestrial system.

NEXT STEPS

On 5 November 2012 the Minister for Environment and Sustainable Development announced a period of additional work to reflect on and fully explore all the information received, to inform how we move ahead with MCZs in Wales. A Task and Finish Team, supported by a stakeholder group, was established to do this work and it reported with its recommendations in April 2013. The final report is available from the Welsh Government's website via the address below.

www.wales.gov.uk/marine

ANNEX A - LIST OF ORGANISATIONS

Please note that some organisations and correspondents submitted more than one response.

Businesses and Representative Bodies

ABC Powermarine

Abersoch Moorings Ltd.

Abersoch Sailing School

AM Seafoods Ltd.

Anglesey Sea Zoo

Blue Thunder Charters

Boathouse Café

Boatshed North Wales

BPA/UKMPG

British Holiday & Home Parks Association - Gwynedd & Ynys Môn Branch

Calgo Publications

Celtic Array Ltd.

Celtic Cruising & Snowdonia Sailing School

Celtic Diving

Chamber of Shipping

Coastal Spirit

Cragen Llŷn a Môn

Croeso Criccieth

Dale Sailing Company Ltd.

David Lea Architects

Ecclesiastical Insurance

Endurance UK

Federation of Small Businesses

Firmhelm Ltd.

Green Enterprise Cymru

Gwynedd Economic Partnership

Gwynedd Market Traders Association

Hardey's Recovery Ltd.

Hastings & Co.
Haulfryn Group Ltd.
Haven Waterway Enterprise Zone
Integrated Business Support Ltd.
JKA Sailmakers
John Lamb Associates
Kinetic Business Solutions
Llŷn Fishermens Association
Marine and Charter Solutions
Marine Charter Sea School
Max Walker Yacht Delivery
Milford Haven Port Authority
Moel y Berth Caravan Site
MPA Fishing Coalition
Murco Petroleum Ltd.
National Federation of Fishermen's Organisations
National Grid
North Wales Fishing Charter
Pant Gwyn Caravan Park
Pembrokeshire Craft Makers Ltd.
Pembrokeshire Cruising
Pembrokeshire Tourism
Penrallt Coastal Campsite
Pisces Environmental & Fisheries Consultancy
Preseli Venture Eco Lodge & Adventures
Pwllheli Chamber of Commerce
Pwllheli Marine Traders Association
Pwllheli Partnership
Renewable UK-Cymru
RWE NPower
S&G Response
Saundersfoot Harbour Commission
Seafish
Selective Seafoods

Shaw Austin Accountants
Shearwater Safaris Charter
South and West Wales Marine Leisure Federation
South Hook Terminal Company Ltd.
Starida Sea Services
The Clockhouse B&B
The Crown Estate
The Griffin Inn, Dale
Valero Energy Ltd.
Welsh Fishermen's Association
Wern Fawr Manor Farm
West Wales Dive Company
West Wales Shellfishermen's Association
William Partington Marine Ltd.
World Sea Fishing Ltd.

Recreational interest and/or representative

Abercastle Boatowner's Association
Angling Cymru
Bargoed Sea Anglers
Blackwater Wildfowling Association
British Association for Shooting and Conservation
British Sub Aqua Club
CA Cruising Association
Coastal Local History
Dale Yacht Club
European Federation of Sea Anglers – Welsh Section
Flintshire Sub Aqua Club
Heavy Metal Sea Dangers
International Game Fish Association
Llanbedr & Pensarn Yacht Club
Llanreath Divers
Lough Foyle Wildfowling Association

Merioneth Yacht Club
Monmouth Sub Aqua Club
North Wales Pilgrims Way
North West Venturers Yacht Club
Pembrokeshire Performance Sailing
Pembrokeshire Wildfowlers Association
Port Dinorwic Sailing Club
Porthmadog Sailing Club
Pwllheli Mooring and Berth Holders Association
Pwllheli Sailing Club
Recreational Sea Anglers
Red Dragon Divers
Rhondda Sub Aqua Club
Royal Welsh Yacht Club
Royal Yachting Association
Saundersfoot Sea Angling Club
South Caernarvonshire Yacht Club
Stratford-upon-Avon Sub Aqua Club
Tenby and District Angling Club
The Historical Search Society (Mold)
Walton-on-Naze District Wildfowlers Association
Welsh Association of Sub Aqua Clubs
Welsh Federation of Sea Anglers
Weymouth and District Wildfowlers Association

Local government and/or representative

Aberdaron Community Council
Beaumaris Town Council
Botwnnog Community Council
Buan Community Council
Cllr Jamie Adams
Cllr Ellen ap Gwynn
Cllr Lewis Davies

Cllr Dyfed Edwards
Cllr Aled Lloyd Evans
Cllr Penri Jones
Cllr Michael Owen
Cllr Bryan Owen
Cllr Vivien Stoddart
Cllr Hywel Williams
Cllr Wyn Williams
Conwy Town Council
Criccieth Town Council
Dale Community Council
Fishguard & Goodwick Town Council
Gwynedd County Council
Llanbedrog Community Council
Llanengan Community Council
Llangoes & Penmon Community Council
Llannor Community Council
Marloes & St Brides Community Council
Milford Haven Town Council
One Voice Wales
Pembrokeshire County Council
Pwllheli Town Council
Tenby Town Council
Tudweiliog Community Council
Ynys Môn County Council

Third sector/other

Aberdaron Tourist Link
Bardsey Island Trust
Caernarfon Harbour Trust
Cilgwyn Community Group
Criccieth Lifeboat
Diocese of Lichfield

Llais Gwynedd
National Farmers Union
Pembrokeshire Coast National Park Authority
Pen Llŷn Communities First Partnership & Cymydmaen cyf.
Porthdinllaen Tenants Association
RNLI
Sustainable Abersoch Cynaliadwy
The University of Western Australia
Trinity House

Environmental/conservation body

Bardsey Bird and Field Observatory
Bywyd Cymru
Campaign for the Protection of Rural Wales
Cardigan Bay SAC Relevant Authorities Group
Countryside Alliance
Dale Environmental Group
Field Studies Council
Friends of Pembrokeshire National Park
Marine Conservation Society
Montgomeryshire Wildlife Trust
National Trust
Natur
North Wales Wildlife Trust
Pen Llŷn a'r Sarnau SAC Liaison Group
Radnorshire Wildlife Trust
RSPB
Sea Trust
Skomer Marine Reserve Advisory Committee
The Wildlife Trust of South and West Wales
Wales Environment Link
Wildlife Trust Wales
WWF Cymru

National government and/or representative

Albert Owen MP

Antoinette Sandbach AM

Dafydd Elis-Thomas AM

David T C Davies MP

Elfyn Llwyd MP

Ieuan Wyn Jones AM

Janet Finch-Saunders AM

Kenneth Skates AM

Paul Davies AM

Stephen Crabb MP

Public sector

Food Standards Agency

Maritime & Coastguard Agency Navigation Safety Branch

Royal Commission on Ancient and Historic Monuments Wales

Ysgol Gynradd Llanbedrog

Ysgol Pentreuchaf