



Marine Strategy Framework Directive: Programme of Measures consultation

Response coordinator:

Dr Jennifer Riley (Jennifer.riley@noc.ac.uk)

Input:

Mr Steve Hall (sph@noc.ac.uk)

Professor Ian Wright (Ian.Wright@noc.ac.uk)

Dr Brian Bett (bjb@noc.ac.uk)

About us:

The National Oceanography Centre www.noc.ac.uk was formed on 1 April 2010 by bringing together into a single institution the Natural Environment Research Council's activity at the National Oceanography Centre, Southampton (NOCS) and the Proudman Oceanographic Laboratory (POL) in Liverpool. The NOC works in close partnership with the wider marine science community to create an integrated research capability. NOC is the focus for UK oceanography

Declaration of interests:

NOC welcomes the opportunity to respond to the DEFRA Consultation on the Marine Strategy Framework Directive: Proposals for UK Marine Monitoring Programmes. The National Oceanography Centre (NOC) and our parent body, the Natural Environment Research Council (NERC), have a long-standing of close scientific collaboration with DEFRA, especially through co funding of scientific programmes. We have discussed this consultation with colleagues and experts in NOC (listed above) and the views expressed here are our own and do not necessarily reflect those of our parent body NERC. NERC has been apprised of this consultation response.

Date of Submission:

24th April 2015

Consultation Questions:

Question 1: Are the proposed measures for the Descriptor sufficient to meet the requirements of the Directive, bearing in mind the current limitations in our knowledge base?

- [1] For all of the descriptors, **the proposed measures appear sufficient to meet the requirements of the MSFD**. As clearly stated there are some significant limitations particularly for marine litter and underwater noise. In these cases good baseline data is needed to be able to measure any change and determine the ultimate achievement of GES. In order to develop such a baseline close work with the scientific research community is essential.
- [2] It is **important that deep-sea habitats are appropriately studied and monitored** by either existing or new programmes. Reference to deep-sea habitats throughout the consultation document focuses almost exclusively on deep-sea fisheries. Although economically important there are other aspects of the deep-sea that also warrants monitoring and has potential economic implications for society, including habitat mapping, benthic species biogeography, biodiversity and taxonomy, ecosystem function, carbon and elemental cycling, climate change impacts and natural resource extent/availability (e.g. rare earth elements for deep-sea mining activities).



- [3] The designation of 27 MPA's around the UK as discussed in the consultation document will facilitate the achievement of GES for multiple descriptors. The second tranche of MPA's (currently under consultation) will work to further achieve GES. Within this second tranche of MPA designations it will be important to **learn from the processes previously undertaken** in the first round. In particular with the designation of the second tranche there should be **better equivalency over how data is judged** between sites, **representation of stakeholder communities** and **impartial scientific advice** in the future designation rounds.
- [4] The scrutiny the science underwent in the first round was very strict. Such scrutiny is essential to ensure that underpinning data is robust. However, in some cases scrutiny was taken to the extreme with one point from the commercial sector resulting in a non-designation of an MPA, without **consideration of its overarching long-term benefits**.
- [5] **Balancing economic and scientific evidence** in the designation of MPA's is essential as it provides a holistic view of the designation being considered, as well as the impacts on both society and the environment. Furthermore indirect costs such as carbon sequestration should also be considered as part of a holistic, scientific and economic analysis of the impact of MPA's on the environment.

Question 2: Are there any additional existing or planned measures for this Descriptor we have not identified that might also contribute to the achievement of the relevant environmental targets and the achievement or maintenance of GES?

- [6] In general we support the listed programme of measures identified. The list is fairly comprehensive across each of the descriptors. However, throughout the document there was a persistent **lack of reference to organisational structures**, which bring communities together to discuss cross-sectorial issues relating to the achievement of GES.
- [7] Descriptor 11, underwater noise clearly lacks the baseline data against which monitoring to achieve GES can be undertaken. As clearly set out in the consultation document more work is needed to monitor the environment. In order to undertake this work and ensure that a balanced view of the issues pertaining to underwater noise is understood, the UK Marine Science Coordination Committee (MSCC) has an Underwater Sound Forum. This forum is unique in bringing together a diverse community and providing a platform to facilitate knowledge exchange and ensure the different sectors (industry, government and academia) work together to help achieve GES. As such this forum should be included in the list of measures to help achieve GES, especially for this descriptor, which is currently poorly understood.
- [8] The consultation did make reference to the work of the Productive Seas Evidence Group (PSEG), which is part of the MSCC organisation within Descriptor 7 Hydrographical Conditions. However the work of the MSCC evidence groups, not just PSEG cuts across many of the MSFD descriptors (e.g. 1, 4 and 6 Pelagic Habitats, 1 and 6 Benthic Habitats). As such **reference should also be made to other groups and forums within MSCC**¹ (e.g. Marine Industries Liaison Group (MILG), Ocean Processes and Evidence Group (OPEG) and Healthy Biologically Diverse Seas Evidence Group (HBDSEG)) as they promote discussion of the key science policy issues related to MSFD as well as bringing different science and stakeholder groups to the same forum to discuss cross cutting issues underpinning the achievement of GES.
- [9] Furthermore throughout the document there was a **lack of reference to funded science programmes**, which contribute to the MSFD targets. For example Defra has invested in the **UK-Integrated Marine Observing Network (UK-IMON)**², which is in the final stages of development. Its aim is to provide coordination of operational oceanography monitoring around the UK and as such will provide cross cutting monitoring support for many of the MSFD descriptors. Such monitoring will help to tie the long-term scientific data from both industry and academia to MSFD targets and goals.

¹ www.gov.uk/government/groups/marine-science-co-ordination-committee

² www.uk-imon.info/



- [10] Similarly NERC has invested (along with Defra) in the **Shelf Seas Biogeochemistry (SSB) research programme (2011 – 2017)**³. This is a £10.5 million programme, which aims to reduce the uncertainty in the understanding of nutrient and carbon cycling within the shelf seas, and of their role in global biogeochemical cycles. The results generated in the SSB programme will also provide effective policy advice to the MSFD process in the UK.
- [11] Programmes such as SSB are in their nature short term. However, the work undertaken and the data collected can still contribute as part of a long-term assessment of UK waters within the MSFD process. As such reference could be made to the **on going contribution of short term research programmes**, the importance of the data generated within them and the role they play in helping to define baselines for GES and understand processes within the UK waters.
- [12] Increasing emphasis is being placed on scientists to show the relevance and impact of their work in order to win grants from funders such as NERC. As such many research projects although funded on the short term (3 – 5 years) are focussed on **delivering an impact to society**. For example the Shelf Seas Biogeochemistry NERC research programme has a series of research cruises around the UK to help better understand baseline conditions for pelagic habitats, nutrients and hydrographical conditions. **Data collected from science programmes should also be listed as a measure**, which the MSFD utilises to better understand baseline and prevailing conditions in UK waters.
- [13] For descriptor 10, Marine Litter, reference could also be made to the **European Marine LitterWatch**⁴ citizen science programme, which aims to collect data on marine litter on beaches relevant with the help of interested citizens and communities. It also allows the collection of data from non-official initiatives such as clean-ups. This is a citizen science programme that the UK could also utilise to help better understand its baseline data.

Question 3: Are there any new measures that are needed? If so please provide details and evidence to show how they would contribute towards the achievement or maintenance of GES or the environmental targets as set out in the Marine Strategy Part One.

- [14] For some descriptors there are multiple levels of pre-existing legislation in place, which will be used to achieve GES. For example Descriptor 1 and 4: Fish, which utilises over 14 different sets of legislations and bylaws including:
- The reformed Common Fisheries Policy (implemented nationally through the devolved administrations via the Conservation Credits Scheme in Scotland and the Inshore Fisheries Conservation Authorities Byelaws in England)
 - Marine Protected Areas
 - Habitats Directive
 - Birds Directive
 - Water Framework Directive
 - Conservation of Habitats
 - Species Regulations 2010
 - Offshore Marine Regulations
 - Wildlife and Countryside Act
 - Shark Action Plans
 - EC regulations on:
 - the removal of shark fins on board vessels
 - establishing measures for the recovery of European Eel stocks
 - Convention on migratory species
 - North Atlantic Salmon Conservation Organisation recommendation/guidance
 - National and local bylaws for the regulation of salmon, sea trout and eel stocks

³ www.uk-ssb.org/

⁴ www.eea.europa.eu/themes/coast_sea/marine-litterwatch/at-a-glance/european-citizens-to-help-tackle



- [15] Of the listed pre-existing legislation in place only the WFD and the Eel Management are noted as being coordinated at a national level. Given the complexity of the pre-existing legislation there is a need to ensure that it is **managed coherently within the scope of the MSFD in the UK**. Regular review and assessment of activities via a forum or platform similar to the Marine Science Coordination Committee (MSCC) Underwater Sound Forum⁵ could be established. This would help to facilitate to better coordination of activities as well as share ideas and knowledge nationally.

Question 4: Are there any measures proposed that you think are not justified or that will not contribute towards the achievement or maintenance of GES or the environmental targets set out in the Marine Strategy Part One?

- [16] No, we agree with all of the proposed measures and feel that they are adequate as a minimum to achieve and maintain GES.

Question 5: Do you agree with the justifications provided for the use of exceptions under Article 14?

- [17] Yes.

Question 6: Are there any significant human activity-related pressures that are not addressed by the proposed measures?

- [18] No.

⁵ www.oceannet.org/underwater_sound_forum/index.html