

# CONSULTATION

## Response Document



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### **Marine Strategy Part One: UK Updated Assessment and Good Environmental Status**

**(DEFRA, DAERA, Welsh Government and Scottish  
Government)**

20 June 2019

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute leads the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme, and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network

# Comments from CIEEM

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## Introduction

We welcome the opportunity to participate in the consultation on the updated UK Marine Strategy (part one). We would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

## General Comments

We are pleased to see the commitment to international collaboration throughout the document, particularly in reference to continuing collaboration after the UK leaves the European Union.

There is a disconnect between “human impacts” and climate change in the draft UK Marine Strategy (part one), despite these being intrinsically linked. Climate change will have major impacts on UK marine habitats in coming years, as is referenced in the document. However, targets fail to include reference to climate change mitigation, other climate change policy and efforts towards limiting climate change. This needs to be addressed in the updated strategy.

The removal of ‘biodiversity’ as a descriptor of Good Ecological Status should be reversed to include a target of maintaining and enhancing biodiversity.

### **1) Does the UK Marine Strategy Part One provide an accurate reflection of the state of UK marine waters and the economic and social uses of those waters?**

No comment.

### **2) To what extent are the proposed new criteria and associated targets sufficient to guide progress towards achievement of GES?**

The targets for Food Webs (D4) are not as strong as in part one of the previous UK Marine Strategy. There should be a commitment to no significant adverse change in the function of different trophic levels in marine food webs as a result of human activities, including as a result of by-catch and discards.

The target for breeding seabirds which states “widespread lack of breeding success in marine birds caused by human activities should occur in no more than three years in six” suggests that this level of impact is acceptable, when human impacts on population demographic characteristics should be minimised and if possible, eliminated.

Climate change is likely to be the greatest pressure on UK marine waters in coming years. This is referenced in the consultation document in relation to increases in surface water temperatures, ocean acidification, sea level rise, turbidity and reduced oxygen levels. Table 4 indicates that ‘rising sea surface temperatures will continue through the 21st Century, with increases of 2°C - 3°C

expected for UK waters.’ This would result in significant adverse impacts to marine waters and potentially change the marine communities which reside in them.<sup>1,2</sup>

The high-level objective for GES of ‘D7 Hydrographical Conditions’ is “the nature and scale of any permanent changes to hydrographical conditions resulting from anthropogenic activities do not have significant long-term impacts on UK habitats and species”. The criterion is “permanent alteration of hydrographical conditions”. This appears to indicate that the UK Marine Strategy Part One will take action to prevent climate change having major impacts on UK habitats and species.

However, the target for ‘D7 Hydrographical conditions’ only includes the effects of significant marine infrastructure developments. This target is inadequate to prevent climate change resulting in major impacts on UK habitats and species because:

- 1) Licensing conditions do not require sufficient reductions in greenhouse gas emissions by marine infrastructure developments.
- 2) The target does not include land-based infrastructure and other sectors that emit greenhouse gases.
- 3) The target does not specifically mention climate change or greenhouse gas emissions.
- 4) No linkage is made to wider UK legislation and targets relating to climate change.
- 5) The target regresses from the previous target of “all developments must comply with the existing regulatory regime and guidance should be followed to ensure that regulatory assessments are undertaken in a way that ensures the full consideration of any potential impacts, including cumulative effects at the most appropriate spatial scales to ensure that GES is not compromised.”

### **3) To what extent are the proposed operational targets sufficient to achieve GES?**

Our response to Question 2 is also applicable here. The target for ‘D7 Hydrographical Conditions’ should include specific reference to including the effects of climate change and/or greenhouse gas emissions.

While we welcome the target to continue research into the impacts of anthropogenic noise, the operational targets for ‘D11 Underwater Noise’ do not include the provision of guidance on how to assess impacts of these sounds against the threshold level. This will create great difficulties in assessing progress towards GES for marine planning as assessments could differ and therefore not be comparable.

The operational target for ‘D1, D4 Birds’ includes “...applying Environmental Impact Regulations for inshore and offshore activities”. This is welcome, however an operational target of applying Environmental Impact Assessment, along with use of the mitigation hierarchy<sup>3</sup>, for marine planning should be applied to more than just this area of the strategy. For example, ‘D7 Hydrographical Conditions’ refers to assessing the cumulative impacts of major developments and Marine Plans. In

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<sup>1</sup> Kroeker K.J., Kordas R.L., Crim R.N. & Singh G.G. (2010) Meta-analysis reveals negative yet variable effects of ocean acidification on marine organisms, *Ecology Letters*, 13(11), 1419–1434

<sup>2</sup> Hoegh-Guldberg O. & Bruno J.F. (2010) The Impact of Climate Change on the World’s Marine Ecosystems, *Science*, 328(5985), 1523-1528.

<sup>3</sup> Ministry of Housing, Communities & Local Government (2019) National Planning Policy Framework, London: The Stationary Office, Paragraph 175.

this case, applying Environmental Impact Assessment should be included in operational targets for measuring progress towards GES and in Marine Plans.

#### **4) Where gaps have been identified do you have suggestions on how these could be filled?**

The target for D7: 'All significant marine infrastructure developments must meet licensing conditions to ensure they do not adversely affect the marine ecosystem', should be amended to include:

- 1) ambitious targeted reductions in greenhouse gas emissions for significant marine infrastructure developments.
- 2) Links to wider UK legislation and targets covering the wider UK economy, both marine and land based.
- 3) Specifically mention climate change and greenhouse gas emissions.
- 4) Provide a date for meeting the target which should be as soon as reasonably possible.

The operational target 'We will further develop our approach to assessing the cumulative effects of major developments' should be amended to:

- 1) Include ambitious targeted cumulative reductions in greenhouse gas emissions for developments.
- 2) Link in with wider UK legislation and targets covering the wider UK economy.
- 3) Specifically mention climate change and greenhouse gas emissions.
- 4) Provide a date for meeting the target which should be as soon as reasonably possible.
- 5) Include the application of Environmental Impact Assessments and the mitigation hierarchy for infrastructure projects.

The operational target for 'D11 Underwater Noise' should include provision of guidance on the assessment of the impacts of anthropogenic noise and how this relates to the threshold level.

There should be a target to maintain and enhance biodiversity as in the previous UK Marine Strategy. The quality and occurrence of habitats and the distribution and abundance of species should be in line with prevailing physiographic and geographic conditions.

In order to meet GES targets, targets for each descriptor must be ambitious and not regress from the previous strategy.