CONSULTATION

Response Document



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Updated UK Marine Strategy Part Two: Marine Monitoring
(Department of Environment, Food and Rural Affairs)

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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 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led 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
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

We welcome the opportunity to participate in the consultation on the updated UK Marine Strategy. 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 with any queries.

This response was compiled by our Marine and Coastal Special Interest Group (SIG). Members of the Marine and Coastal SIG Committee volunteer their time to support members working in this sector through providing opportunities to network, share skills and provide a focus for engaging with and responding to marine policy consultations.

Comments from CIEEM

General Comments

We welcome the continued commitment to working at an international level and that the need for a robust monitoring programme, developed with experts in this area, is recognised.

We welcome the recognition that informal sources of data have a role to play in assessing the environmental status of UK waters, alongside official monitoring and survey programmes. As well as accessing a wider range of data, knowledge, and experience, this approach also opens up the whole process of achieving Good Environmental Status making it relevant to a wider range of participants. We are aware that some local initiatives are already collating significant amounts of information,

capturing and making accessible a wide range of local knowledge and expertise. The annual publication of the South-West Marine Ecosystems (SWME) report [1] is an example of a local approach to environmental assessment that can complement and inform national efforts. We highlight additional examples in relevant Descriptor comments.

In addition, much can be gained using data gathered for one purpose to inform other areas. For example, we understand that CEFAS carries out seabed surveys to assess *Nephrops* populations by counting burrows. This same footage can provide valuable information about the state of associated seabed habitats. Similarly, data collected to monitor the recovery of reef habitats in Lyme Bay carried out by the University of Plymouth, again using video surveys, was able to be re-analysed to assess recovery of seabed communities on sediment veneers [2]. There will be many more opportunities to apply the 'collect one, use many times' approach to marine survey and monitoring and this should be recognised through the Marine Strategy.

Consultation Questions

1) Are the proposed monitoring programmes sufficient to meet the requirements of the Marine Strategy Regulations 2010, bearing in mind our current knowledge base?

No comment.

2) Are the proposed monitoring programmes sufficient to provide the necessary data to assess progress towards the achievement of good environmental status (GES), and the related targets, as set out in the updated UK Marine Strategy Part One?

No - see details for relevant indicators below.

Cetaceans D1, D4

The suggestion to increase the frequency of large-scale cetacean surveys such as SCANS is welcomed, though we would prefer to see this suggestion included as specific proposals for change. We also welcome the recognition that other data sources might be used in species assessments. There are many cetacean recording schemes being carried out around the UK, most run on a voluntary basis. Volunteer programmes must ensure volunteers are suitably qualified and experiences to prevent inaccuracies in identification.

We acknowledge that not all the data gathered may be robust enough to detect trends and assess abundances but work to bring standards up to those of the best, e.g. through training and certification in identification, and to collate information from across all schemes, will significantly add to our understanding. The monitoring of seal colonies by a range of different groups, collated by SMRU, provides a model that could usefully be applied more widely.

Seals D1, D4

We welcome the suggestion that the Cetacean Strandings Investigation Programme (CSIP) programme is expanded to include stranded seals in England and Wales, allowing assessment around all UK coasts. This will allow better assessment of the level of human pressures on seal populations, especially in relation to the impact of marine litter, which we see as a particular problem. Similarly, increased gathering of information on fisheries bycatch through the UK Bycatch Monitoring Programme is to be welcomed.

Birds D1, D4

Monitoring and surveys of bird populations is well covered by a range of initiatives, most of which include input from voluntary organisations and schemes. These provide additional examples of how data collected by a wide range of groups can be incorporated into national reporting.

Fish D1, D4

We welcome the recognition that additional monitoring and survey for elasmobranch species is needed. The focus on fish species listed in various Annexes of the Habitats Directive, especially in terms of monitoring distributional range and supporting habitat condition, means that this important group has been overlooked to date. Again, we would like to see firm proposals for this gap to be filled, rather than simply identifying a need.

We are interested to read about issues surrounding the assessment of rare species in UK waters. Work in this area will help give indications of shifting distribution patterns in relation to climate change. The SWME report, mentioned previously, includes reports from a local initiative monitoring rare and unusual species as they pass through local fish markets. This could provide a useful model for similar work elsewhere.

Cephalopods D1, D4

We note that there is no separate discussion of survey and monitoring of cephalopod populations. And assume that data relating to these species are included in programmes for assessment of non-commercial and commercial fish species. Clarification of this would be welcome.

Reptiles D1, D4

We are disappointed that there is no discussion of monitoring and survey for turtle species. Although they may be considered non-resident, assessment of turtle species abundance in UK waters will feed into wider, international, initiatives relating to range and distribution. This is particularly important if they are at the edge of their natural range and showing signs of decline [3]. Feeding into such international initiatives would also align with the earlier commitment to continue an international approach.

Benthic habitats D1, D6

We welcome the new programme of monitoring benthic habitats developed since publication of the 2014 UK Marine Strategy Part Two document, particularly regarding an increased focus on offshore Marine Protected Areas (MPAs). We are, however, concerned that there are no programme addressing benthic habitats beyond MPAs. The monitoring of benthic habitats within MPAs is a vital part of the management process, allowing measures to be adapted in response to pressures and impacts. However, an assessment of GES in all UK waters must include monitoring of unprotected as well as protected sites. Otherwise results and assessments will be skewed, with a risk that signs of poor ecological status will be missed. This also allows clear indication of whether an area should be protected and whether measures within protected areas are working.

We do not underestimate the challenges of monitoring benthic habitats in UK waters, let alone expanding this to include the wider benthic environment. As has been mentioned previously, the use of a wider range of data sources will contribute, including data gathered during planning for offshore development and, in coastal and inshore areas, by local recording initiatives such as Seasearch [4] and Shoresearch [5]. Data should, however, be checked to ensure it is robust and to avoid any misidentification.

Finally, we welcome the increased use of vessel monitoring systems in the inshore fishing fleet, providing assessment of fishing pressure on benthic habitats at a higher resolution and with greater accuracy.

Commercial fish D3

The effective management of commercial fisheries relies on the collection of good quality data and, as a result, there are many survey and monitoring initiatives in place to assess both populations (stocks) and pressures (landings). We have two specific points to raise in respect of commercial fish species.

Firstly, landings data can only provide an accurate indication of fisheries pressure if all that is caught is landed and we welcome the ongoing commitment of the UK Government to ending the practice of discarding fish at sea.

Secondly, fisheries survey and monitoring programmes need to be able to react to development of new fisheries in a timely manner. The need for increased monitoring of fisheries for whelk and cuttlefish is highlighted as an issue. These are now well-established fisheries and it is disappointing that monitoring programmes and stock assessments are still to be developed.

We have no additional comments for other indicators.

3) Are any additional monitoring programmes needed in order to assess progress towards achieving GES and the related targets?

We welcome the many ideas raised in the 'Issues and Opportunities' discussion for each Descriptor. These will help fill gaps and improve understanding of the ecological status of UK waters. However, we are disappointed that many of these are put forward as possibilities or ambitions rather than concrete proposals for action. We would like to see as many as possible of these ideas turned into survey and monitoring programmes, as soon as possible. We have highlighted specific proposals in relevant Descriptor comments in question 2.

4) Are you aware of any additional marine monitoring currently being carried out that we have not covered which could contribute to our assessments and make them more effective?

One important potential source of data that has not been included is that being gathered by offshore developers. Information gathered will include surveys of benthic habitats and monitoring of marine species. In many cases, ongoing monitoring of species and habitats may be required as part of licensing conditions. While we acknowledge that there may be complexities in accessing data gathered for commercial purposes, many projects are in receipt of direct or indirect public subsidy, and it can be argued that the data collected should be used for public as well as private benefit.

References

[1] Hiscock, K., Earll, R. and White, R. (eds) 2020. *South-west Marine Ecosystems Report for 2019*. Marine Biological Association of the UK, Plymouth. DOI: 10.17031/a4k9-p258

[2] Sheehan, E.V., Sophie Cousens, S., Nancollas, S.J. and Strauss, C. **2013**. *Drawing lines at the sand: Evidence for functional vs. visual reef boundaries in temperate Marine Protected Areas*. Mar. Pollut. Bull., http://dx.doi.org/10.1016/j.marpolbul.2013.09.004

- [3] https://www.cambridge.org/core/journals/journal-of-the-marine-biological-association-of-the-united-kingdom/article/longterm-insights-into-marine-turtle-sightings-strandings-and-captures-around-the-uk-and-ireland-19102018/6F91AE37C8EAE5C0CB143ABC18CAF03D
- [4] http://www.seasearch.org.uk/
- [5] https://www.wildlifetrusts.org/get-involved/other-ways-get-involved/shoresearch