1. The National Oceanography Centre, Southampton www.noc.soton.ac.uk is the UK’s premier centre for ocean science and is jointly operated by the Natural Environment Research Council and the University of Southampton. As a major marine stakeholder and data provider NOCS welcomes the opportunity to comment on ‘Delivering Marine Conservation and Zones and European Marine Sites - A draft strategy for marine protected areas April 2009’.

2. We very much support the page 5 stated aim of policy as being ‘to recover and protect the richness of our marine environment and wildlife through the development of a strong, ecologically coherent and well managed network of marine protected areas, that is well understood and supported by all sea users, by 2012’

3. We note that 2012 is an ambitious timescale to achieve the development of a network of marine protected areas. We welcome the ambition but are concerned that there are currently inadequate resources in terms of expertise, in-situ data and high quality mapping to deliver on this aim in the projected timescale.

4. We agree that it is essential that UK and Devolved Administrations are committed to working together to deliver an ecologically coherent network of Marine Protected Areas (MPA’s).
4.1 How will the process of working together be coordinated? Is it possible to measure success?
4.2 Which body has oversight? Is this a role for JNCC, or the Marine Science Coordinating Committee, or the Marine Management Organisation? It isn’t clear who has the authority to ensure cooperation takes place.

5. Natura 2000 sites require a degree of joined-up planning that is currently not in place. For example is Defra working with DECC on compensatory habitat policy with regard to major public projects as would exist if the Severn Barrage proposal is initiated?

6. We welcome the statement on page 21 and restated on page 30 that management of MPA’s will be based on best available scientific and socio-
economic evidence. Funding for the requisite evidence gathering does not appear to be available within the 2012 timeframe for designation of sites.

7. We note that regional stakeholder for a are proposed. At the time of writing (July 2009) we are not aware at NOCS corporate level of any members of our expert staff forming part of the stakeholder panels. Is the selection process open and transparent, and who is choosing the members? If it is JNCC we aren’t clear how they are going about the process

8. Page 43 mentions the international dimension to Marine Protected Areas. We are concerned that the Common Fisheries Policy remains in force as a deeply flawed policy that could utterly negate many of the advances made by the provision of marine spatial planning laws in the UK. As a matter of urgency fisheries must be brought into the marine spatial planning system, or badly-needed protection will not be possible to achieve.

9. Final points – Can a MPA be de-designated or moved a few kilometres once it is in place? Given that so little is known about the UK’s marine habitats it is likely that future knowledge will enable us to re-examine if our initial decisions were correct. It may be the case that the MPA needs to be moved a few kilometres, or the MPA could turn not to need as much protection as was first feared.
   On a similar line will there be an appeal process against designation as a MPA? We can envisage situations where stakeholders may feel that a decision was not based on best available scientific evidence, and could contest the designation.

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