

**To:** 1. Julia Williams JD2614/10  
2. Minister for Environment, CC:P/S Minister for Rural Affairs  
Sustainability and Housing Graham Rees

**From:** Louise George Stuart Evans  
Marine Branch  
Nature, Access and Marine Unit

Ext 1258

**Date:** 20 December 2010

### **Marine Conservation Zone Project Wales – Site Selection Guidance**

1. You have received a letter from Dr Stephen Lockwood, Chair of the MPA Fishing Coalition in response to the MCZ Site Selection Guidance that has recently been subject to a period of public comment which closed on 26 November.
2. In his letter Dr Lockwood explains the purpose of the MPA Fishing Coalition; a UK-wide coalition which seeks engagement with the UK Government, devolved administrations and conservation agencies on matters concerning marine protected areas (MPAs).

#### **Decision to establish highly protected sites (no-take zones)**

3. The Coalition's concerns are that the new MCZs in Wales are to be designated as highly protected marine conservation zones in which no fishing will be allowed i.e: 'No Take Zones.' Dr Lockwood states that no legislation requires the designations of highly protected sites and neither is there scientific evidence that particular habitats and species require such a high level of protection in Welsh waters. He has asked you to reconsider proceeding with highly protected sites in Wales in the absence of a clear scientific case for doing so.
4. Officials are aware of the Coalition's concerns which were raised at a meeting with officials earlier this year and in correspondence with Elin Jones the Minister for Rural Affairs Minister – which was copied to you under reference EJ633/10.
5. Our position remains that the decision to designate highly protected MCZs in Wales as areas where there can be no damage to or removal or deposition of flora or fauna of any kind (commercial or otherwise) is based on the fact that such areas in Wales will be recognised as important for ecosystem function, recovery and resilience. We recognise that there is as yet limited empirical evidence of the benefits of highly protected sites in waters similar to Wales'. However the strong scientific opinion both internationally and domestically (including our statutory advisers CCW) is that highly protected sites are an important part of any MPA network because of the role they play in terms of supporting recovery, enhancing resilience and improving our understanding of the marine environment. This was the approach set out in the Welsh Assembly Government's consultation paper entitled 'Protecting Welsh Seas' which we issued in September 2009 and is the basis on which the MCZ Site Selection Guidance has been developed.
6. When developing the Guidance it was recognised that given the developmental nature of highly protected sites it would be difficult to justify with some key sectors such as fishing and energy interests, an approach that was aiming for the stars without first gaining a better understanding in practice of the ecosystem benefits of these sites. For this reason it was decided that until we know more about how these

sites really respond to a high level of protection and understand more about the true benefits for healthy functioning, robust and resilient ecosystems, to limit the number of HPMCZ designations initially to 3 to 4 sites. Early analysis of responses to the Site Selection Guidance does however indicate that environment NGOs and many with a conservation interest are unhappy with this approach as not going far enough. Officials are considering all comments received with a view to finalising the Site Selection Guidance in the New Year.

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**Louise George**  
**Marine Branch**