

Ms Barbara Anning
Head, Marine Management Organisation Team
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

12 February 2010

Dear Ms Anning

RE: The revised statutory guidance to the Marine Management Organisation on its sustainable development objective

While the organisations that comprise the Wildlife and Countryside Link (Link) coalition welcome the publication of the revised draft guidance on sustainable development for the MMO, and the opportunity to comment on this, we do not think that there have been significant revisions or improvements on the previous version. In particular, we still believe that the document needs to be more specific and not rely entirely on the MPS to provide all the detail. We reiterate the key point that: the MPS will not be adopted for two years but the MMO will be required to make decisions and guide development from April 2010. It is therefore vital that the guidance is detailed enough to allow the MMO to fulfil its role in the absence of the MPS. The language used in this guidance should be strengthened to provide a more robust and effective framework for the MMO to operate within.

In essence, Link is unsure how this guidance is actually meant to practically help the MMO deliver sustainable development. It is our view that the document does not clearly set out guidance on what should be considered in individual decisions and it does not fully explain what types of evidence or considerations may be relevant for taking into account each of the five principles of sustainable development. It is our view that the MMO would benefit from more detailed and practical guidance.

Link still stands by all the comments raised after seeing the previous draft guidance but highlights some of our specific concerns again below:



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(1) **Sustainable Development:** the revised document again includes the following statement:

“The five principles have been adopted as the High Level Marine Objectives, published by the UK administrations in 2009. These are:

- **achieving a sustainable marine economy;**
- **ensuring a strong, healthy and just society;**
- **living within environmental limits;**
- **promoting good governance; and**
- **using sound science responsibly.”**

We would like to again point out that listing the five principles in this way does not reflect the emphasis of the statement in the UK Sustainable Development Strategy, which puts environmental limits and a just society at the forefront as the key objectives and suggests that the other principles will be used to deliver them. Link still suggests that this needs to be changed to reflect what the UK Sustainable Development Strategy actually says.

(2) **Consistent and co-ordinated approach:** Link welcomes the additional sentence (pg 8, paragraph 2): “Again, this will be particularly important in cross-border areas where the MMO will need to conclude working-level arrangements with devolved authorities to ensure a joined-up, co-ordinated and cohesive approach”. However, Link still believes that more explanation is required and reference should be made in the guidance to the MoUs that will exist between devolved administrations and their content or timetable for delivery.

(3) **Biodiversity:** there is still little reference to meeting biodiversity targets and the need to employ the ecosystem approach early on in the document. Link believes the document needs to contain more detail on how the MMO will contribute towards the UK’s biodiversity and conservation obligations and that this should be included in the main part of the document (‘Role of the Marine Management Organisation’) and not referred to under ‘Other relevant principles’.

(4) **Adaptation to climate change:** there is still no explicit reference to the need to mitigate and adapt to climate change impacts. Although Defra have confirmed that climate change mitigation and adaptation principles will be in the MPS, Link firmly believes that this also needs to be firmly embedded in the MMO guidance.

(5) **The role of the MMO:** the role of the MMO is still not defined explicitly within the revised document and, as mentioned above, still depends heavily on the MPS. There is still no explanation of how the MMO is accountable or to whom the MMO should report and how.

(6) **Working in partnership – Infrastructure Planning Commission:** It is still not made explicitly clear what the MMO’s role will be under the Planning Act. Link is still concerned with the following: Under **evidence based decision making** it is stated that “The evidence to which the MMO should have regard when making decisions includes socio-economic information, monitoring data, predictive modelling studies and other research material”. This statement needs to be consistent with the MMO’s general objective in the Marine & Coastal Access Act, which states that evidence should be social, economic and environmental.

- (7) **Prioritisation and accountability:** We are concerned that this section has been removed from the revised guidance and it is unclear where this information is otherwise contained. If it is in the Marine & Coastal Access Act or contained in other documents then this needs to be referenced and made clear as we believe it is an important part of the MMO guidance.

Link welcomes the chance to see and comment on the revised draft guidance for the MMO and we are eager to be involved with the development of the MMO as it starts its work in April.

Yours sincerely



Joan Edwards

Chair, Wildlife and Countryside Link's Marine Legislation Working Group

On behalf of the following organisations:

- Buglife – The Invertebrate Conservation Trust
- International Fund for Animal Welfare
- Marine Conservation Society
- Royal Society for the Protection of Birds
- Whale and Dolphin Conservation Society
- The Wildlife Trusts
- WWF – UK
- Zoological Society of London