

David Dawson  
Director of Marine and Fisheries  
Department of Environment, Food and Rural Affairs  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

6 July 2010

Dear David

**Re: Consideration of socio-economics in the MCZ Regional Stakeholder Projects**

As raised with you, your Defra colleagues, Natural England and JNCC on a number of occasions, we are extremely concerned regarding how and when the MCZ regional stakeholder projects are considering socio-economics in determining the MCZ network. We are writing to you now as our concerns were confirmed last week in a presentation at Bob Earl's Marine Planning Conference, 1<sup>st</sup> July 2010 in London to a large UK-wide audience from the Finding Sanctuary Project. Our concerns refer to two specific points about how the regional projects are reading/interpreting the various guidance and other documents on MCZs which lack clarity.

1. The first step the regional projects are taking in determining the MCZ network is excluding the high density fishing areas from the area of search for MCZs. This directly contravenes the many verbal and written assurances we, as well as MPs and Peers, were given when the Marine & Coastal Access Bill was in Parliament. These assurances (in Hansard, and the letter to Link, shared with MPs and in the House Library, 22 October 2009, as well as in meetings with Defra, Natural England and JNCC either collectively or separately) clarified that the first and primary consideration when designating MCZs would be science, and that socio-economic factors were optional, secondary considerations, to be used in the case where the scientific information showed that there were alternative sites of equal ecological quality. The screening out of certain areas from consideration for designation due to their use at the very beginning of the process conflicts with the many assurances we have received on the spirit and interpretation of s.117(7) of the Marine & Coastal Access Act.
2. Related to the above point, in response to a question from SFF (Scottish Fishermen's Federation), the speaker 'confirmed' that the English Regional Projects have a "requirement to minimise the socio-economic impacts" of designation, and that this requirement goes "well-beyond" the letter to Link from Huw Irranca-Davies in October (i.e. the letter in the House Library). When questioned further, the Finding Sanctuary representative stated that there was clear policy direction on this point, as both the Ministerial Statement and the Project Delivery Guidance (PDG) were "very specific" about the consideration of socio-economics. These statements clearly demonstrate our fear that the Regional Projects feel compelled by documents such as the Project Delivery



Wildlife and Countryside Link  
89 Albert Embankment  
London  
SE1 7TP

T: 020 7820 8600  
F: 020 7820 8620  
E: [enquiry@wcl.org.uk](mailto:enquiry@wcl.org.uk)  
W: [www.wcl.org.uk](http://www.wcl.org.uk)

"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Paul de Zylva, Director: Jodie Bettis

A company limited by guarantee in England & Wales  
Company No. 3889519 Registered Charity No. 1107460

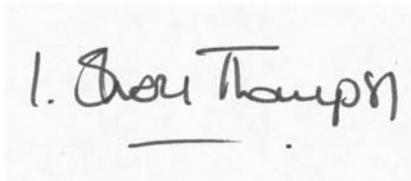
Guidance, the Ministerial Statement, and Defra's MPAs Strategy to prioritise minimising the socio-economic impacts of the MCZ network - even where this is at the possible expense of the achievement of an ecologically coherent network overall.

We raise these points again as concrete examples of the concerns we have highlighted on numerous occasions in the past now happening in practice. This is despite and in direct contradiction to the many verbal assurances we have had from Defra, Natural England and JNCC, that the Ministerial Statement and the PDG are clear about when and how socio-economic factors should be considered, and that there definitely isn't any rolling back on the assurances we (and MPs and Peers) were given that science and conservation would be the primary factors in site designation and that socio-economics would be secondary and would not impact on the achievement of an ecologically coherent network.

We now demand, as a matter of urgency, that clear guidance (in the re-drafted PDG) is given to the regional projects and all stakeholders to tell them when and how socio-economic factors should be considered.

If Defra, Natural England and JNCC want the continued support of NGOs for, and in, the regional projects, then the minimum we expect from you is to honour the assurances that we were given during the passage of the Bill.

Yours sincerely,

A handwritten signature in black ink that reads "I. Sharon Thompson". The signature is written in a cursive style and is positioned above a horizontal line.

Dr. Sharon Thompson  
Vice Chair, Link Marine Legislation Working Group

This letter is supported by the following Link members who were present at the Planning Conference on 1<sup>st</sup> July 2010 and/or who are involved in the MCZ Regional Projects:

- Marine Conservation Society
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- WWF – UK

Cc. Alison Reeves (Defra)  
Simon Crabbe (Defra)  
James Marsden (Natural England)  
Jamie Davies (Natural England)  
Chris Davis (Natural England)  
Beth Stoker (JNCC)