

## **CRAGEN Llŷn a Môn**

17, Tros yr Afon  
Llangoed  
Beaumaris  
Ynys Môn  
LL58 8AT

21st September 2012

Mr Alun Davidson,  
Committee Clerk  
Environment and Sustainability Committee  
National Assembly for Wales  
Cardiff Bay  
CF99 1NA

Dear Mr Davidson,

### **National Assembly for Wales Environment and Sustainability Committee Inquiry into Marine Policy in Wales.**

#### **Response from Cragen Llŷn a Môn.**

Cragen Llŷn a Môn is a recently formed environmental organisation composed of people local to North West Wales who have come together in the face of the Welsh Highly Protected Marine Conservation Zone (HPMCZ) project. Many of us have felt for some time that native and local people have had insufficient representation with regard to conservation and planning legislation, and that their needs and indeed their potential to make valuable contributions to these matters have been ignored or disregarded by government and their agencies for too long.

The aim of Cragen Llŷn a Môn is to "protect the social ecology of the coastal and rural communities of North West Wales and their natural environments". In practice this means the representation of local environmentally responsible industries including fishing, farming and tourism and the promotion of proportionate conservation and sustainable resource use. In time we hope to develop an educational role, disseminating information to inhabitants and visiting users of our coast and landscapes, and a role in scrutinising new legislation and developments which could affect our environment and people.

In a Wales where there are dozens of organisations lobbying for the protection of specific groups of wildlife, specific groups of people or single issues, we are attempting to represent the integrated systems of nature, human populations and industrial and recreational activities which are the realistic future for our rural areas. We believe that to plot sustainable courses for the future, we must keep one eye on the past.

**Cragen Llŷn a Môn.**

Chair: Ms Claire Russell Griffiths (claire.gareth@btinternet.com). Vice Chair: Dr Philip Hollington (phil.hollington@btinternet.com). Secretary: Mr Colin Evans (colin6evans@btinternet.com)

We thank the Welsh Government for the opportunity to contribute to the current enquiry and hope that they may find our contribution constructive. We also confirm our willingness to give evidence in person to the Committee if required.

The purpose of the inquiry is to assess progress made by the Welsh Government in relation to implementation of the Marine Act 2009 with particular regard to the marine conservation and the marine spatial planning powers of the Act; and to assess progress made by the Welsh Government towards the achievement of its European obligations in this field with particular regard to the Marine Strategy Framework Directive, the Birds Directive, the Habitats Directive, the Bathing Water Quality Directive and the Water Framework Directive. We wish to comment only on certain aspects of this:

1. Progress in relation to the development of marine spatial plans for Wales.
2. The current status of marine protected areas in Wales and what role the new marine conservation zones should have in this network of protected areas.
3. The development of the Welsh Government's functions in relation to marine licensing and fisheries and whether this has been effective.
4. Whether the Welsh Government has sufficient financial and staff resource to deliver on its marine policy and legislation objectives?
5. Whether stakeholders have been sufficiently involved in the shaping of new policies and the development of legislation?

At present, the Welsh Government is a relatively new institution. Many, particularly in the north, feel that it has not grasped the reality of the situation relating to environmental matters, most notably regarding marine issues including fisheries. Some of this may be due to the lack of a cohesive representation of fisheries and local community groups, some simply due to the relatively recent formation of those branches of WG which deal with fisheries and the marine environment, but we feel that there has also been some imbalance in representations made to WG by lobbying NGOs, and worryingly also by members of Government agencies charged with advising on marine policy.

For the reasons outlined below, we strongly feel that the Welsh Government needs to ensure that Marine Policy

- is driven by the latest scientific thinking, not that of ten years ago,
- takes account of local ecological knowledge, and of all available evidence, not just that which corresponds to a particular agenda driven by certain individuals and lobby groups, and
- ensures full stakeholder involvement from the beginning of any process.

### **1. What progress has been made in relation to the development of marine spatial plans for Wales?**

The integrated nature of fisheries, marine conservation, coastal and marine industry and coastal communities should be reflected in Welsh marine spatial planning policy to a far greater extent than it seems to be at the moment, and it is becoming clear (e.g. Rees *et al.*, 2012) that even where there is sound ecological knowledge of a

particular area, a reliance on traditional economic valuation for marine spatial planning can obscure other issues, particularly when an ecosystem approach is preferred. The same would be the case if the planning was solely on the basis of environmental factors. Low impact fishing methods such as are practiced by the majority of Welsh vessels are largely compatible with the aims of marine conservation (see for example Blyth *et al.*, 2002, 2004 from work in similar coastal communities in the south west of England; Jenkins & Garrison, 2012), although there is room for Highly Protected zones where the ecological risk justifies their use; i.e. when specific fragile features are shown to be under threat from current use or proposed developments, but only under such circumstances. We suggest that where fishing methods are incompatible with WG's statement on sustainable development they should be managed in a proportionate manner with due regard for the socio-economic aspect. This could take the form of gradually imposed restrictions so to protect environmental features while minimising the effect on fishing and associated businesses.

Although it is perhaps outside the remit of the new Natural Resources Body for Wales to actively protect them, the body should at least be constitutionally committed to avoid harming natural human resources such as traditional communities, Welsh language and rural/coastal culture in the way that the proposed HPM CZ project would.

Additional desirables for future success in sustainable marine management are, in our opinion:

- Integrated, adaptive co-management of marine and coastal resources
- Use of evidence based approaches to policy.
- Use of all available data, including Traditional Ecological Knowledge.
- Recognition of the heritage value of fishing and coastal communities for tourism, and Welsh identity.
- An economically realistic view; we need industries; they must be economically and environmentally sustainable and self-sustaining. There will have to be trade-offs.
- Acceptance of the reality of Wales and the UK's energy requirements. There is no opting out of a commitment to renewable which, if properly managed, could generate a considerable upside for the Welsh economy.

These are all in accord with good practice for Sustainable Development, the flagship policy of the Welsh Government.

## **2. What is the current status of marine protected areas in Wales and what role should the new marine conservation zones have in this network of protected areas?**

European Marine Sites (EMS) cover around 30% of Welsh Territorial Seas, and the maintenance of their structural and functional integrity is a key objective of the Habitats Directive (Dernie *et al*, 2006). We note that WG is currently undertaking a review into the current status of Welsh MPA including EMS. We also note with

concern that most (around 60%) are currently considered to be in unfavourable condition. A significant reason for this classification is the fact that illegal fishing (towed gear) continues to be practiced within these sites, with no effective protection.

Improved management of our European Marine Sites must be an essential component of Marine Policy. The establishment of MCZs of whatever form can only be a meaningful contribution to an Ecologically Cohesive Network of marine sites if all those sites are properly managed, and thus the priority for WG must be to ensure that EMS including the SACs and Special Protection Areas are strengthened to more fully regulate damaging activities. We understand that there are provisions within the Marine and Countryside Access Act 2009 to facilitate this.

There are substantial inconsistencies in the approach to the Marine and Coastal Access Act (MACA) 2009 between the devolved administrations of the UK, with Wales alone choosing to use a universal Highly Protected (HP) approach to the Marine Conservation Zones (MCZ) facilitated by the Act. There have also been differences in the way local communities have been engaged in the process of bringing the MCZ projects forward, with the highest level of stakeholder engagement in Scotland and the lowest in Wales.

In Wales it is reasonable to believe, in fact it is likely, that these zones as planned will be so prescriptive in their management as to unnecessarily prohibit many low-impact leisure and culturally important activities outside of commercial fishing. This has alarmed and angered people in coastal areas who are not directly involved with the commercial fisheries, and has galvanised them into action.

#### ***Advocacy and Promotion of the Highly Protected Approach.***

There is a longstanding and unfortunate lack of communication and trust between the Countryside Council for Wales (CCW) and the fishing communities of Llŷn and Anglesey. Much commitment has been put in on both sides over the last several years to reduce this breach, but all this has recently been undone by the current HPMCZ project.

There is evidence that the HP approach to MCZs was strongly advocated within CCW from an early stage, and despite individual staff strongly denying responsibility once the strength of feeling against the concept manifested itself, the project has reinforced many people's feelings that the Government's statutory advisor is largely dismissive of local culture and native ways of life. This is despite its statutory duty to "to have regard to the social and economic interests of rural areas".

Promotion of the HP concept continued throughout the consultation period, with the widespread distribution by CCW of "*The Science of Marine Reserves*", a document by the western-USA based Partnership for Interdisciplinary Studies of Coastal Oceans (PISCO) that details both the truly positive and the ostensibly positive results of HPMPA worldwide, without reference to the substantial body of scientific evidence that indicates ambiguous or negative results. Tellingly, neither this document nor any the promotional material by CCW or WG Marine Branch reference the systematic review of evidence on whether MCZ are effective tools for sustainable fisheries management (Stewart *et al.*, 2008) which concludes that the

jury is still out on several aspects of their value. Systematic reviews are widely used by governments as the “gold standard” in the provision of evidence in many fields of science.

Much of the work cited in favour of the HP approach has been carried out in Australia. However, Kearney *et al.* (2012a) argue that a disproportionate focus there on banning all fishing, in the absence of clearly-identified threats from most forms of fishing and without assessment of how best to manage those threats that have been identified, has prevented adequate protection against the full range of threats to marine environments. Further, they convincingly argue (Kearney *et al.*, 2012b) that the uncritical transposition of terrestrial management paradigms to the marine environment have led to improper management for effective conservation, and has biased public perceptions of the effectiveness of HPMCZ, concluding that “good fisheries governance by traditional management techniques.....when used correctly, negates the need for widespread, non-specific no-take zones for conservation purposes”.

Dr Mary Lewis and other CCW staff attended a meeting to discuss HPMCZs in Caernarfon on 03 July 2012 where Dr Lewis spoke on the benefits of HPMPA in European waters. She stated that there were 74 in European waters, but we note from the PISCO document that all but 18 of them were in the Mediterranean or around the Canary Islands and Azores. This could be construed as a deliberate attempt to mislead the uninformed as to the benefits, whereas in fact very few were directly relevant. It will be seen that the benefits in UK waters are not unambiguous, in terms of either socio-economic or ecological factors. There is an increasing body of evidence that highly protected MCZs are unlikely to be anywhere near as effective in tidal, temperate seas as they are in the warm tropical reefs where most of the work has been done (discussed in Caveen *et al.*, 2012a). Differences result from, for example, the extensive seasonal movement of fish in temperate seas compared to the more sedentary nature of reef species, and extended larval duration and mobility in higher latitudes. At the same time, there has been an increasing realisation of the importance of a thorough understanding of the impacts of HPMCZ upon local communities and culture, evidenced by a recent (2011) international conference in London entitled “*It’s not just about the fish: social and cultural perspectives of sustainable marine fisheries,*” the papers from which are available in the prestigious journal *Marine Policy*. Neither of these aspects were taken account of by WG Marine Branch in the documentation for the recent consultation.

CCW have provided the Marine Conservation Society (MCS) with £40,000 to promote the HP concept in Wales. We cannot see how this is a justifiable use of public money, when a) the benefits to the Welsh marine environment are so unquantifiable so as to render the whole project effectively an experiment; b) when the effect of designating sites would have such serious consequences in terms of economic and cultural cost that the project becomes very controversial; and c) when there was no equal contribution to any other group to either oppose the HP concept, or look into any other alternative. In addition, CCW funded Seasearch to the tune of over £134,000 to collect data on habitats and species.

## *Natur*

We note that Natur, a professional institute for those working within conservation in Wales, has responded to the HPM CZ consultation in favour of the HP approach. Natur was established to "raise the profile of the countryside and conservation management profession...(and) to stimulate and develop the skills which are necessary to manage the living and cultural environment of land and sea.." Cragen are glad to note that Natur has committed to some degree of respect for local interests, point number seven (of eleven) of their Professional Responsibilities for Members being to "as far as possible" include local people in the decision making process. Unfortunately consideration of the benefits of Traditional Ecological Knowledge (TEK) to help inform the scientific decision making process is not mentioned.

There is a substantial link between Natur and CCW, with many high level CCW employees being members, and the body providing a substantial amount of funding for Natur.

While it is entirely laudable that Natur exists to represent, and promote the skills of, those charged with management of our natural resources, when it attempts to influence government policy through lobbying there exist potential conflicts of interest. Where a body provides advice on government policy, as it is CCW's statutory remit to do, and there is then subsequent promotion of the selfsame advice by the selfsame employees through their membership of what can be considered a lobbying group, this may be unfair. This may be the case especially where the implementation of the promoted policy may result in furtherance of individual careers.

### ***The science behind the Highly Protected approach for Wales***

There is evidence that the case for HPMPA has been overstated to the people of Wales, and presumably also to WG at the beginning of the process. As noted above, it is very possible that the perceived benefits that have been observed in other climatic regions would not be reflected here in Wales.

HP sites can be very effective in protecting threatened features from specific threats, but these threats which in Wales largely derive from bottom fishing with towed gear, seabed development in terms of renewables and associated infrastructure, coastal realignment or coastal building projects, can be mitigated in other ways that are less prescriptive in their effects on low impact activities. Many of these threats are already subject to regulation from more than one source, though there is a lack of enforcement of these regulations in some cases, for example scallop dredging in EMS. Proportionality in matching the ecological risk to the appropriate level of regulation is absent from the HP approach.

Highly Protected sites are by no means the only means of ensuring adequate protection for the features found within the marine environment of Wales, but the authorship of documentation behind the Welsh project is dominated by advocates of the HP approach such as Prof. Callum Roberts and Dr Susan Gubbay, a former senior conservation officer at the MCS who is now a member of CCW's council. The documentation is notable for its omission of evidence countering the prevailing

orthodoxy on HPMCZ. Much of this documentation was presumably commissioned by CCW and put out to a tendering process. We suggest that this process should be scrutinised to ensure that the tender documentation was written in such a way as to ensure the very best methods of protecting the Welsh marine environment were considered, and that the HP approach was not the only one. A recent paper (Caveen *et al.*, 2012b) has highlighted the fact that the topic of HPMCZ was so emotive that some scientists were allowing their own pre-conceptions and prejudices to influence their thinking, rather than acting objectively on the evidence.

There is doubt about the quality of data used in selecting the proposed sites, and the way it has been processed. Much of the data on habitats is predictive, using HABMAP computer modelling to apply point survey data to unsurveyed areas. Other data derives from Seasearch. There is doubt about the quality of this data as the degree to which Seasearch operatives were trained is variable, and whilst we understand that there has been some grading of operatives and a subsequent weighting of the data provided by individuals, the data quality likely to be variable. In saying this we do not mean to denigrate the efforts made by divers collecting data for monitoring purposes; it's a logical, altruistic and useful way of them using their hobby to help marine conservation. The sites have been selected by analysis of the collected data by the Australian developed Marxan marine zone planning computer program, which has known limitations, in particular in regard to stakeholder involvement, but is free to use.

***Lack of stakeholder engagement*** (Please also see section 5 below).

To their credit, CCW have often admitted that HPMPA need stakeholder and local community support to be successful. Indeed, the few HP sites already designated in the UK are seen either to have local support (for example Lyme Bay, Isle of Arran), or are where the local communities are not dependent on them to the same degree as those proposed for Wales (for example Lundy Island has no resident fishing community). CCW staff have repeatedly stated that they wished to take account of socio-economic considerations earlier in the process, but were prevented from doing so by WG. This situation has most regrettably undermined CCW's position among affected communities as it appears to confirm many local people's perception of CCW as unsympathetic to, and dismissive of, their interests.

The fact that stakeholders were left out of the process for so long has engendered anger and mistrust along the coast. Some NGOs such as WWF and MCS seem to feel that that this has been the only problem with the HP approach, and that if the process had been more open from the beginning there would not have been such a reaction against the concept. From where we stand amongst the grass roots of the affected communities, this is not entirely correct. The clearance of traditional fishing and other activities from areas fished or otherwise used by many generations of the same family, and the imposition of an alienating piece of legislation, remains however long the consultation process.

***The role of lobbying Non Government Organisations***

We would like to take this opportunity to highlight the behaviour of NGOs in attempting to influence WG Marine Policy. We are aware that they have been very active in lobbying for various marine issues, and the HPMCZ project is no exception.

Whilst there is undoubtedly a commitment to the marine environment on the part of bodies like MCS, one must question their philosophy when they call for all ten proposed HPMCZ sites in Wales to be designated, when they often have little knowledge of the individual areas concerned or the potentially negative ecological results of designation such as displacement of user effort, long term changes in species ecology or their effects on practices that sustain other ecosystems, such as the National Nature Reserve on Bardsey Island.

It must be remembered that NGOs are often very reliant on funds from public donations to sustain them. In this respect they could be considered as businesses, the service they provide being to make the representations their funders think appropriate. As the message they provide to the general public is often necessarily overblown or simplistic, so it follows that the representations they make to government can be likewise, and government should be cautious when considering them.

### **3. The development of the Welsh Government's functions in relation to marine licensing and fisheries.**

#### ***The nature of the Welsh fishery.***

The Welsh fleet generally consists of under 10 metre vessels day working from ports or open beaches using in most cases low impact static gear, targeting shellfish such as lobster and crab. Whilst many areas are fished in very ecologically responsible ways, there is some room for the larger Welsh fleet to improve in terms of sustainability and we would be keen to see the static gear shellfish fleet undertaking effort restrictions, which would be likely to show some ecological benefits outside of those directly benefiting target species.

#### ***Welsh Government's Fisheries Unit.***

The Fisheries Unit at WG has had a hard act to follow. The North Western and North Wales Sea Fisheries Committee (NWNWSFC) had the support of industry and was generally felt to be a force for good. It was an example of a co-management system, with scientists, local councillors and fishermen themselves involved. Although a greater level of patrol and enforcement was necessary even then, the fishery patrol vessel "Aegis" was a regular sight along the coastline, and the fishery officers were well respected and had a good relationship with fishers; unfortunately not always the case with their counterparts at the Marine Fisheries Agency. Many in the industry were saddened and concerned when responsibility for Welsh fisheries was transferred to WG.

It is understandable that there would be a period of adjustment and upheaval following the transfer of responsibility for fisheries to WG, but the level of patrol and enforcement seems to have been steadily falling and Welsh fisheries administration seems to have been in crisis.

We are particularly concerned at the extensive deployment of towed gear in the Cardigan Bay scallop fishery. Apart from the damage caused by scallop dredges to sensitive parts of the seabed, much of this activity appears to be illegal, understood to be taking place within the Special Area of Conservation. Local fishermen and other



citizens have consistently reported this apparently illegal activity to WG with little response and no obvious consequences.

Regarding the Special Areas of Conservation, their predecessor authority NWNWSFC were a Relevant Authority for the SAC. We understand that WG's Fisheries department are not part of the Relevant Authorities group. We consider that because sea fisheries represent a major user activity within the SACs that there appears to be a lack of cohesion in regard to this.

***Welsh fishers have not organised sufficient representation.***

It seems that Welsh fishers have suffered from a lack of representation at government level, partly due to a lack of organisation on their part. The Welsh Federation of Fishermens Associations was not felt locally to be successful at providing the link between grass-roots fishers and policymakers in Cardiff. For whatever reason, the successor Welsh Fishermen's Association (WFA) seems to be making more progress and is felt to be more representative of the industry. From Cragen's point of view the WFA has shown itself to have a responsible regard for environmental matters and its response to the Highly Protected Marine Conservation Zone (HPMCZ) project evidences this. Events such as the HPMCZ project and their work on lessening the environmental impact of the Welsh scallop industry continue to strengthen the WFA, and it is to be hoped that its environmentally responsible approach and its strengthening relationship with WG may be helpful in informing future proportionate marine policy.

**4. Has the Welsh Government sufficient financial and staff resource to deliver on its marine policy and legislation objectives?**

It appears not, given the situation regarding the lack of enforcement of EMS regulations and fishery policy. An example is the regular trashing by a JCB of the beach at Lleiniog within the Menai SAC – despite this being regularly reported to the Environment Agency it continues every year. Other examples include the illegal netting within the Menai Strait, and the illegal scallop dredging off the coast of Pen Llŷn. While EAW enforcement staff do the best they can, there are not enough of them, and they are not resourced well enough, to be able to deal with these and other sometimes potentially dangerous situations.

**5. Have stakeholders have been sufficiently involved in the shaping of new policies and the development of legislation?**

As a recently formed organisation, Cragen Llŷn a Môn feels unqualified to comment on policies or legislation predating those currently in consultation. However with regard to the HPMCZ process, we would like to comment that the early stages of that process appear to have been seriously deficient in that a) local stakeholders were not sufficiently aware of the existence or the effects of this legislation; b) that those who attended the early meetings appear to have been presented with a 'done deal', the alternatives to HP not having been properly presented; c) that local stakeholders were insufficiently represented on the Stakeholder and Citizens Engagement Group (SCEG); and that d) the process of consultation begun in April 2012 used documentation that was difficult to interpret, misleading and simplistically assumptive of significant benefits of the HP concept with no real

evidence provided to back this up. A fundamental weakness of the SCEG was that its ToR made clear it was not to act as a stakeholder forum *per se*, but to be an intermediary between the TAG and individual stakeholders. Given the restricted make-up of the group, particularly in the early days of the HPMCZ process, this was never going to happen.

Some fishermen and local stakeholders attended a workshop in Llandudno in 2008, where workshops were undertaken to launch the HP approach in Wales. This meeting was facilitated by Prof. Callum Roberts, a well known international advocate of Highly Protected Marine Protected Areas (HPMPA). This was the first opportunity for local interests to comment on the approach, and a number of concerns were raised which were not properly addressed either at the workshop or subsequently. We do not believe that facilitation by an advocate of the process was appropriate in leading to an objective outcome, and this was reinforced in that a number of the fishers and others who furnished critical responses at the meeting were not contacted subsequently, despite a commitment from the organisers to do so. These local interests then did not have an opportunity to attend SCEG meetings, and the first many in the fishing community knew of the proposed sites was when the consultation was published in April 2012, by which time the process appeared to be a done deal.

This disregard for stakeholder views and for local ecological knowledge flies in the face of an increasing realization amongst the scientific community of the importance of both. The European Commission itself has recognized lack of stakeholder involvement as a major weakness of the Common Fisheries Policy (Pita *et al.*, 2010). Gopnik *et al.* (2012) have recently reaffirmed the value of bringing *all* stakeholders together at the planning stage of a process. Bundy & Davis (2012) also noted the strengths, as well as the limitations, of spatially-explicit local knowledge as a contribution to ecosystem approaches to fisheries management.

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We trust this response will be helpful to the Committee in its enquiry, and reiterate our willingness to attend to give evidence in person should that be required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'PA Hollington', written in a cursive style.

Dr Philip Hollington  
Vice-Chair, Cragen Llyn a Môn