

Conservative manifesto for conservation

Written evidence from Wildlife and Countryside Link Marine and Whales Groups

November 2018

Wildlife and Countryside Link (Link) is the largest environment and wildlife coalition in England, bringing together 49 organisations to use their strong joint voice for the protection of nature. Our members campaign to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

The following Link members support this evidence:

- Humane Society International
- International Fund for Animal Welfare
- Institute of Fisheries Management
- ORCA
- MARINELife
- Marine Conservation Society
- RSPB
- The Wildlife Trusts
- Whale and Dolphin Conservation
- WWF

1. What are the biggest immediate and longer-term threats to marine ecosystems?

Climate change: The most systemic and existential threat, manifested in a range of disruptive impacts (see answer to Q2 for details).

Pollution: Our seas are becoming a toxic soup of plastic waste and chemical pollutants. For more information on impacts of plastic waste, see our answer to question 5. Chemical pollutants such as Polychlorinated Biphenyls (PCBs), despite being banned, are widely associated with [long-term population decline](#) in whales, dolphins and seals and a [recent report](#) estimated 50% of the global orca population could collapse due to PCBs.

Bycatch: Despite actions taken by international, regional, and national regulatory bodies, bycatch in fishing gear remains one of the foremost threats to marine wildlife. Recent estimates of the annual UK fisheries toll include over [1,500 small cetaceans](#). There are also seabird bycatch hotspots but due to a lack of adequate monitoring, bycatch mortality estimates for seabird species are [unknown](#). (See also Q6.)

Whaling – Though the UK is a leading advocate for the abolition of commercial whaling, other nations continue to hunt fin, sei and minke whales. Whales play a vital role in the functioning of marine ecosystems yet if commercial whaling is allowed to expand we risk the extinction of some populations.

Noise pollution: Underwater noise, from [shipping](#), [pile driving](#) or [seismic surveys](#) can lead to direct injury or mortality, permanent or temporary hearing loss and behavioural disturbance of marine wildlife. At a population level, this disturbance or displacement from key habitats can have [significant impacts](#) upon animals’ ability to feed and reproduce successfully.

Marine Invasive Species: The introduction and spread of invasive non-native species (INNS) are one of the greatest threats to the world’s oceans and their islands. Once established, INNS are difficult to control and eradicate, particularly in the marine environment. Therefore, it is essential that effective and robust preventative measures (‘biosecurity’) are in place, as well as procedures for early detection and rapid response to combat new arrivals.

Overfishing and ecosystem impacts: See this [Greener UK briefing](#) on sustainable fisheries for more detail.

The greatest threat of all is the cumulative impact of these issues and lack of monitoring and resourcing to tackle these through systematic change.

2. How does climate change impact upon marine ecosystems?

The most pervasive and immediate impact is through sea warming which is demonstrably altering the composition and lowering the biomass of zooplankton (~70% reduction since the 1960s) in the North Atlantic. In turn, this reduces the abundance and productivity of a keystone fish species (sandeel) and

sandeel-dependent seabird species, potentially also to the detriment of other commercial fish and marine mammals. The increasing incidence of extreme Atlantic storms, especially in winter, adds to seabird mortality. Around a quarter of carbon dioxide released due to human activities (from fossil fuel burning, cement manufacture and land use changes) has been absorbed by the ocean resulting in a decrease in carbonate ion concentration with a decrease in pH of 0.11. These changes increase the risk of eutrophication (compounding the impact of land-based run-off) and difficulties for calcifying organisms, such as plankton, coral and shellfish, to make their shells and skeletons. The impacts of ocean acidification extend up the food chain and will impact fisheries and aquaculture. Sea level rise will affect tourism and threaten shorelines and coastal waters.

3. What are the key policies which the Government should introduce to better protect marine environments?

- Deliver an ambitious Environment Act for England that ensures a fully independent, well-financed green watchdog with powers to enforce environmental legislation. It must enshrine in law a comprehensive set of environmental principles and a duty on Government and all public bodies to maintain, recover and restore the environment through legally binding targets.
- Introduce an effective Fisheries Act that delivers sustainability objectives and integrates marine and fisheries conservation management. For more information on the key requirements for such an act please refer to the Greener UK and Wildlife and Countryside Link [briefing](#) for the second reading of the Fisheries Bill.
- An ambitious UK wide Marine Strategy – The UK Government has committed to maintain the UK Marine Strategy Regulations after leaving the European Union (EU) but to provide an effective framework, the revisions must include targets that are more ambitious. This is vital to [ensure effective delivery of the 25 Year Environment Plan](#). Since the environment is a devolved matter, a revised UK Marine Strategy must be co-developed and mutually agreed by all UK administrations.
- Long term resourcing for monitoring and management - The public authorities tasked with management and monitoring are not properly resourced, either financially or in terms of human resources and expertise. Without proper investment, environmental protections in the law will not be fully realised.
- A coherent, well-managed network of marine protected areas (MPAs) - The MPAs and legal frameworks introduced via the [EU Birds and Habitats Directives](#) must be fully retained and the species and habitats protected by these sites must be brought to Favourable Conservation Status through ensuring effective management across the network after the UK's departure from the EU. Domestic MPAs in England and further designations in Wales and Northern Ireland, should be reviewed to identify gaps and a process for extending these sites or including new ones should be outlined. Again, appropriate management measures must be put in place across these sites
- A cross-taxa bycatch strategy – should be developed setting a clear target to minimise and ultimately eliminate cross-taxa bycatch. To be delivered effectively this strategy should be legally underpinned within clear timeframes, and should include a scientifically robust and accountable monitoring system and an effective implementation programme.
- Legally binding targets to reduce negative impacts of ocean pollution on species and habitats. This should include phasing out single use plastic items and targets to reduce all forms of banned or emerging chemicals of concern. This will reduce threats such as eutrophication or impacts of [PCBs on orca populations](#). This should also include operational and technical measures to reduce emitted anthropogenic underwater noise.

- Effective and complete Marine Plans that take an ecosystem based approach, meaning they recognise the importance of conserving the health of our marine environment by accommodating the needs of wildlife, including seabirds, waterbirds and marine mammals, alongside development needs.

4. How successful has the UK's Blue Belt policy been, and how could it be improved?

The UK's Overseas Territories Blue Belt programme has helped raise the profile of ocean conservation around the world. However, there is also a need to take action in our own seas closer to home. The Government's domestic Blue Belt policy has been a welcome first step in developing an ecologically coherent well-managed network (ECN) of MPAs. However, we do not believe the domestic sites currently designated or pending designation sufficiently complete the ECN, nor that the existing suite of sites is effectively managed and monitored to achieve the conservation objectives of the Blue Belt. To improve this, Government should designate further sites for highly mobile species, swiftly complete the designation of sites identified under the recent SPA sufficiency review, and develop and implement coherent and effective management plans for all marine sites. Link also want to see Highly Protected Marine Areas (HMPAs) designated, alongside other existing and proposed MPA designations. We believe that genuinely well-managed HMPAs should inform the bar against which the rest of the network is judged and are important as reference points for other processes including marine planning. If designated, managed and monitored appropriately, HPMAs offer a way of testing the assumptions made in managing the whole MPA network, in addition to providing space for nature in themselves.

For more information read our [response](#) to the MCZ tranche 3 consultation.

5. How much of a problem is UK-generated plastic pollution in UK waters and how could the Government reduce it?

The UK is forecast to produce [6.3 million tonnes of plastic waste in 2030](#) and packaging accounts for [67% of this](#). Alongside packaging, an issue of concern is lost fishing nets, a key focus of the [Global Ghost Gear initiative](#).

To reduce plastic waste and its impact on the marine environment, Government need to phase out single-use plastics (SUPs). Firstly, they need to commit to the proposed ban of plastics straws, stirrers and cotton buds and extend this to match the [EU ban](#) by including sachets, cutlery and balloon sticks. The Government must then prioritise reduction by introducing item specific reduction targets and a tax on virgin plastics. This would incentivise reduction, more sustainable design, the use of recycled material and encourage a shift to reusable alternatives. An example of this in practice could be a tax on the use of single-use cups, similar to the [plastic bag charge](#).

However, the onus should not be on the consumer to pay the price for our plastic addiction. The Government need to reform our producer responsibility system so producers pay the life costs for the material they produce, with more difficult to recycle plastics costing more.

For more information on our key proposals for tackling the plastic problem please see Link's response to the [Chinese Waste Import Ban inquiry](#), [Disposable Packaging inquiry](#), [The Treasury's consultation on tackling the plastic problem](#) and [Link's Autumn Budget briefing](#).



6. How does the fishing industry impact upon marine environments and how could negative impacts be mitigated?

Certain fishing gear has a severe impact on the marine environment. For example, bottom towed fishing nets drag along the sea floor, destroying habitats and nurseries for fish, shellfish and other populations of marine wildlife. In UK waters, thousands of endangered, threatened and protected species, including cetaceans, seals, seabirds, turtles and elasmobranchs die every year, because of incidental capture and drowning in fishing gear. Currently, adequate bycatch obligations are not included in existing EU regulations, nor in EU law. As a result, the UK cannot rely on adequate measures for addressing bycatch being carried across into UK law upon exiting the EU. Therefore, UK Governments should include a requirement in primary legislation to establish and adhere to a cross-taxa bycatch strategy. The technical details of the strategy itself should then be brought through in secondary legislation. It is important for the initiative to have a legislative footing to ensure it is enforceable and to provide permanence and certainty. The specifics of monitoring and mitigation should be laid out in the bycatch strategy, determined on a fishery- and species-specific basis and reviewed on a five year basis. Read our technical [briefing](#) for information on what a UK cross-taxa Bycatch strategy should include. As well as the direct impacts of gear, abandoned, lost and discarded fishing gear, typically now made of plastic, also impacts the marine environment by entangling and killing marine animals. We welcome the Government's recent commitment to the [Global Ghost Gear Initiative](#), and encourage further support of solution projects to both reduce gear losses and remove ghost gear.

As stated above under Q2, warming seas have reduced the abundance of sandeels and, in turn, the populations of UK seabirds such as kittiwake – a situation exacerbated by Danish-dominated sandeel fishing in wildlife-rich areas of the North Sea. Further curbs on sandeel fishing would help shore up our dwindling seabird populations, bolster the fortunes of cetaceans and other marine mammals, and underscore the UK's ambition to be a world leader among environmentally progressive fishing nations.

We also note our concerns about the culling of seals in the name of fisheries protection and our hope that this practice will soon be ended.

These impacts show there is a clear need for more effective management of fisheries, especially in Marine Protected Areas. One way to improve management would be to provide more resource to the Inshore Fisheries Conduct Authorities (IFCAs). If more sufficiently resourced they would be able to more effectively manage inshore waters and protect against some of these impacts.

EU Exit provides an opportunity for the Government to implement an ambitious Fisheries Act with sustainability at its heart. This would help mitigate the impacts of the fishing industry on the marine environment and could establish the UK as a world leader in sustainable fisheries. Further information on the key requirements we would like to see in the Act are detailed in the Greener UK and Wildlife and Countryside Link [key asks briefing](#) and the Fisheries Bill second reading [briefing](#).