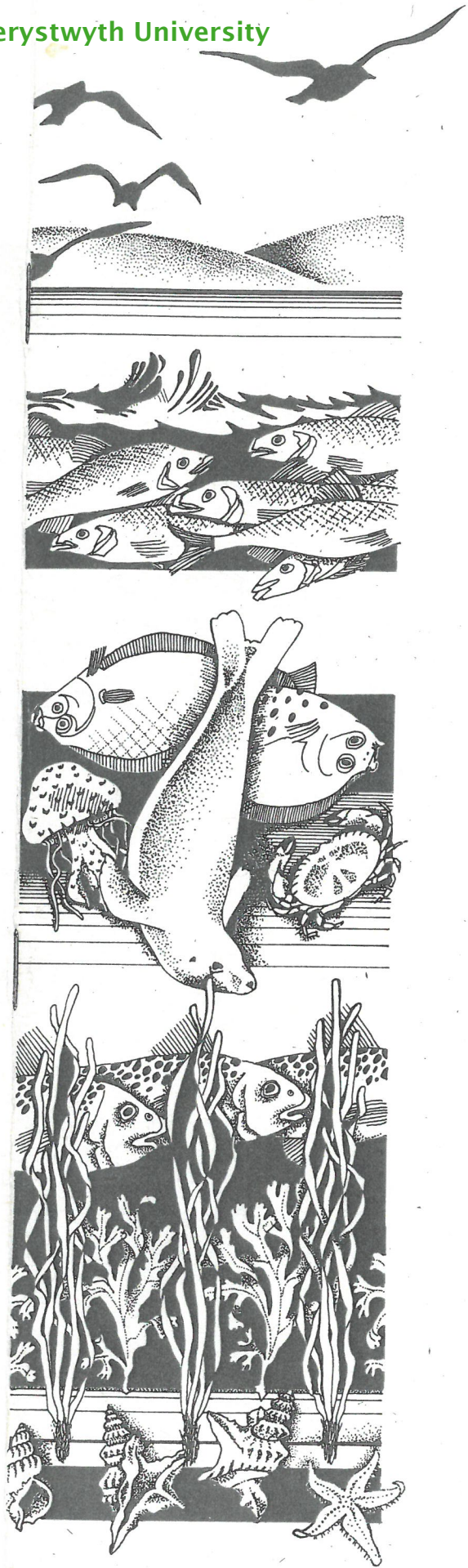


Cynulliad Cenedlaethol Cymru | National Assembly for Wales
 Y Pwyllgor Newid Hinsawdd, Amgylchedd a Materion Gwledig | Climate Change, Environment and Rural Affairs Committee
 Ymchwiliad i reoli ardaloedd morol gwarchoddedig yng Nghymru | Inquiry into the management of marine protected areas in Wales
 MPAW 04
 Ymateb gan Lynda Warren, Prifysgol Aberystwyth | Evidence from Lynda Warren Aberystwyth University



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MARINE
**MARINE
 PROTECTED
 AREAS:**
 A DISCUSSION DOCUMENT



MARINE PROTECTED AREAS

PREFACE

This policy paper contains a proposed framework for a system of Marine Protected Areas, providing integrated, comprehensive management for the conservation of marine resources for a wide variety of objectives. It is intended to be used as basis for further discussion and in support of more specific policies on particular issues of marine conservation adopted by individual conservation bodies.

The paper has been prepared by a group of conservation organisations who were becoming increasingly dissatisfied with existing measures for protecting areas of marine nature conservation importance. Our terms of reference were to propose a legislative framework for Marine Protected Areas in the U.K. that would be sufficiently flexible to meet the full range of marine conservation needs¹, including the U.K.'s international obligations for conservation and, at the same time, sufficiently robust to provide strict protection where necessary. The ideas outlined in this paper can, therefore, be used for the conservation of seascapes, geological, physiographical and archaeological features, as well as marine habitats and wildlife, and can be used for the benefit of different uses of the sea such as commercial fisheries and recreation. The proposals are not restricted to the territorial sea but are applicable to any part of the seas under U.K. jurisdiction².

The marine nature reserve (MNR) provisions in the Wildlife & Countryside Act 1981³ have proved unsatisfactory⁴. Only two small reserves have been declared and the original, ambitious proposals for a first round of seven reserves have had to be abandoned. Both of the statutory marine reserves were already voluntary reserves and yet proposals for statutory designation led to considerable opposition and years of difficult negotiations. The end results are far from ideal in that compromises have had to be made which weaken the intended legal controls⁵. At two sites, the Isles of Scilly and St Abbs, there was such general antagonism to the idea that proposals for designation were dropped. Marine Consultation Areas, which are informal designations made by the Nature Conservancy Council to draw the attention of the Crown Estate Commissioners, who are responsible for issuing sea bed leases for fish farms and other activities, to sites of particular environmental quality and sensitivity, have also failed in their objectives. The designation of a Marine Consultation Area appears to make no difference to the likelihood of an objection to fish farming proposals on marine conservation grounds being upheld⁶.

¹ apart, of course, from more general pollution measures.

² i.e. within British fishing limits, which extend for 200 miles from territorial sea baselines, or on the continental shelf. The territorial sea baseline is generally low water line as marked on official charts although straight baselines may be used where the coast is deeply indented or fringed with islands (as on the west coast of Scotland) or across certain bays.

³ Sections 36 and 37, and Schedule 12

⁴ see Warren, L.M. 1989 *Statutory Marine Nature Reserves in Great Britain. A Progress Report.* WWF, Godalming, 41 pp. for a review of the workings of this legislation.

⁵ For example, in the Lundy MNR the main trawling ground is excluded from the byelaw prohibiting trawlings and, in the Skomer and Marloes Peninsula MNR proposed controls on access have been replaced with voluntary codes of conduct.

⁶ Only 21% of applications for leases for sites in Marine Consultation Areas that were opposed by the Nature Conservancy Council have been refused, compared with 32% of all applications opposed by them. (House of Commons Agriculture Committee 4th Report Session 1989-90 vol II p 91).

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The great value of the approach adopted in this paper is that it brings conservation of wildlife, seascape, commercial species and archaeological features under a simple unified system. The existing legal regime does not provide adequate protection for some of these interests and completely fails to address the question of integration. We have decided, therefore, that it would be better to seek new primary legislation rather than to attempt merely to amend the existing law. The Nature Conservancy Council⁷ list 88 Acts of direct relevance to marine conservation and this is an under-estimate. Amending these Acts satisfactorily would be a difficult, time-consuming task and would produce an end result less satisfactory than new-tailor made legislation because there would be no opportunity of introducing a central conservation theme.

It should be noted that Marine Protected Areas are but one of a number of mechanisms which can be used for the protection of habitats and wildlife in the marine environment. The voluntary approach to site protection, for example, is a useful way to complement statutory options and there are also statutory measures at both national and international level that indirectly promote conservation by addressing related issues such as pollution control⁸. The paper does not deal with the conservation of the wider marine environment but the legislative options it proposes should ideally operate within a system of integrated coastal zone and sea use management based on the need to maintain environmental quality and genetic diversity.

This paper is the result of wide ranging discussions between members of conservation organisations with particular expertise or interest in marine affairs with advice from other organisations and individuals. A full list of those participating in meetings or commenting on previous drafts, is given in the appendix.

⁷ Nature Conservancy Council 1989 *Legislative Responsibilities in the Marine Environment. A Review.* Nature Conservancy Council, Peterborough, 44 pp.

⁸ The Water Act 1989, for example, contains provisions on marine pollution. Internationally, Traffic Separation Schemes, approved by the International Maritime Organisation, reduce the chances of shipping accidents and Special Areas, designated under the MARPOL 73/78 Convention, provide stricter controls over ship borne pollution than apply elsewhere under the convention.

1. INTRODUCTION

There has been a marked increase in public awareness of environmental problems concerning the seas around the U.K. in recent years. This has been reflected to some extent by Government initiatives to tackle these problems⁹, however, one sector which has not been advanced significantly is that of Marine Protected Areas.

The Wildlife & Countryside Act 1981, and the Nature Conservation & Amenity Lands (Northern Ireland) Order 1985, made provision for the introduction of Marine Nature Reserves into U.K. legislation. These were to be established for the purposes of:

- (a) conserving marine flora or fauna or geological or physiographical features of special interest in the area;
- or
- (b) providing, under suitable conditions and control, special opportunities for the study of, and research into, matters relating to marine flora and fauna and the physical conditions in which they live, or for the study of geological and physiographical features of special interest in the area.¹⁰

The idea of site protection in the marine environment was welcomed by conservation organisations who had been calling for such measures to be introduced during early discussions about the legislation.

Following the introduction of the Wildlife & Countryside Act seven sites were identified by the Nature Conservancy Council as potential Marine Nature Reserves (MNRs) for Great Britain. In Northern Ireland the Department of the Environment (NI) have confirmed that one site, Strangford Lough, is on their list of proposed MNRs. Progress in designating these sites as MNRs has been slow and unsatisfactory. The waters around Lundy Island (Devon) were given MNR status in 1986 and an area around Skomer Island and the Marloes Peninsula (Dyfed) became an MNR in 1990.

Despite the slow progress in designating these reserves, there have been no attempts to improve the situation by modifying the legislation or procedures relating to MNRs even though there have been regular debates in Parliament on the shortcomings of the legislation, with relevant amendments to the Wildlife & Countryside Act 1981 and the Environmental Protection Act 1990 being proposed. This is in spite of the fact that the present legislation does not enable the United Kingdom to fulfil its international obligations under the Ramsar Convention¹¹ and the EC Birds Directive¹² both of which require states to use domestic legislation to protect selected sites. Most subtidal sites are given no protection at all because

9 Notably, participation in the International Conferences on the Protection of the North Sea held at Bremen (1984), London (1987) and the Hague (1990).

10 Wildlife and Countryside Act 1981 s36(1) and Nature Conservation & Amenity Lands (Northern Ireland) Order 1985 S.I. No 1985/170 (N.I. 1) article 20.

11 The Convention on Wetlands of International Importance Especially as Waterfowl Habitat 1971.

12 79/409/EEC.

the Site of Special Scientific Interest procedure cannot be used below low water mark¹³ and marine nature reserves are too difficult to designate. Furthermore, there has been no interest on the Government's part in considering the benefits of a unifying, comprehensive system of Marine Protected Areas as part of a general policy to improve the environmental quality of the sea.

This paper develops the concept of Marine Protected Areas for U.K. waters in order to make progress with their establishment and the protection that they might provide. The system is based on the following key points:

1. The primary objective must be the maintenance of the ecological character of the Marine Protected Area. For effective protection at all levels, use should be based on the "precautionary principle".¹⁴
2. Site designation is a valuable tool for protecting habitats and wildlife in the marine environment.
3. There should be a unified and coherent system for site protection in the marine environment rather than the current situation with different types of protected area, proposed on an *ad hoc* basis, independent of each other.
4. A legislative framework is necessary for effective Marine Protected Areas both for the protection of the areas themselves and for the wider marine environment.
5. Marine Protected Areas need to provide a variety of levels and types of protection. All areas will be managed to safeguard the integrity of the marine environment. In some cases the level of interest will necessitate strict protection.
6. Marine Protected Areas benefit many interests. They should not just be considered as conservation areas for habitats and wildlife. They are just as valuable for the conservation of aesthetic features such as seascapes and archaeological remains; for the protection of living marine resources; and for the provision of recreational, research and educational opportunities. Indeed, their most valuable feature is that they provide for regulation in a way that can allow room for traditional uses.

13 This is because of the necessity to notify local planning authorities, the jurisdiction of which ends at low water mark in most cases.

14 The precautionary principle was endorsed by the Second International Conference on the Protection of the North Sea in relation to pollution by substances that are persistent, toxic and liable to bioaccumulate. The principle of safeguarding the North Sea by reducing emissions of such pollutants was held to apply "especially when there is reason to assume that certain damage or harmful effects on the living resources of the sea are likely to be caused by such substances, even where there is no scientific evidence to prove a causal link between emissions and effects". This principle should be applied to all activities.

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7. Marine Protected Areas legislation needs to be relevant to the variety of wildlife (mobile and sedentary) and habitats in U.K. waters. In the past the application of inappropriate¹⁵ or badly drafted legislation¹⁶ in a marine context has led to confusion and has been ineffective in achieving the desired objectives.

8. Marine Protected Areas legislation must allow us to implement both our national and international conservation responsibilities.

Although this paper is specifically concerned with Marine Protected Areas it is also important to note that:

- Marine Protected Areas are only one of a number of measures which are needed for effective marine conservation.
- and
- The success of Marine Protected Areas is dependent on sensitive use of all marine areas and maintaining the quality of the marine environment as a whole.

2. A SYSTEM OF MARINE PROTECTED AREAS FOR THE U.K.

The suggestions for Marine Protected Areas legislation which are outlined below are proposed as a coherent, co-ordinated system and one which will encompass existing national and international responsibilities of the U.K. towards marine site protection.

Existing legislation covers some aspects of the proposals but would need significant amendment. As one of the problems is the use of legislation drafted for different purposes to deal with previously unconsidered marine issues¹⁷, such an approach would probably add to the confusion. A much better way would be to start afresh and enact new primary legislation.

2.1 General Proposals

The proposals are for a two-tier system of site protection consisting of a category providing strict protection for conservation purposes and a more general category in which management of activities is geared towards conservation needs. For the purposes of this document they are simply referred to as "Type 1" and "Type 2" areas. This is because

¹⁵ For example, an attempt was made by the Nature Conservancy Council to use the marine nature reserve provisions of the Wildlife & Countryside Act 1981 to protect sea birds nesting on cliffs on Skomer on the grounds that they formed part of the marine fauna.

¹⁶ For example, The Sea Fisheries (Shellfish) Act 1967 defines the sea shore as extending 6 miles out to sea from the territorial seas baselines. The definition of the intertidal zone in legal terms is confusing in other contexts as well. Thus in Scotland the foreshore is land between ordinary high and low water spring tide levels whereas in England, Wales and Northern Ireland medium tide levels are used.

¹⁷ For example, under the Conservation of Seals Act 1970, seals may be killed without licence under certain circumstances to prevent damage to a "fishing net" or "fishing tackle" and licences may be issued to prevent damage to "fisheries". Application of this Act to fish farms has led to confusion because it is uncertain whether fish farms come within the definitions.

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existing terms in common usage, such as Marine Nature Reserves or Marine Consultation Areas, do not provide an adequate description. They are also associated with preconceived ideas rather than encouraging the "clean slate" approach which marked the thinking behind these proposals.

1. The purpose of the proposed legislation is to provide for the conservation of marine geological, physiographical, seascape and archaeological features as well as flora and fauna (benthic, planktonic and mobile marine species, including commercially exploited species and animals such as birds, spending only part of their lives at sea) through a system of site protection. The areas would also be used for research and as an educational resource to promote knowledge and enjoyment of the marine environment.

2. The designations will apply to any intertidal or subtidal area at least to the limits of territorial waters and, if appropriate, beyond. The precise limits must clearly be the subject of further discussion but they must encompass enough of the coastal fringe to prevent artificial boundaries.¹⁸

3. The boundaries of Type 1 and Type 2 areas will be recorded on Admiralty Charts.

4. Proposals for both Type 1 and Type 2 MPAs will be made by an "Authority". There are several options for the constitution of the Authority but, whatever its form, it will require adequate and substantial resources. It could, for example, be a statutory authority; it could be a sub-department within a government department with its own minister; or it could form part of a new department altogether. This is a matter for further discussion and is not considered further in this paper. It is essential, however, that, whatever form the Authority takes, it has adequate funding and clear responsibilities to designate and manage MPAs.

5. The Authority shall advertise proposals publicly and shall notify parties specially affected. There will be a short (about 6 months) public consultation stage following which an interim management plan will be drawn up by the Authority, in the light of public comments. This plan will be based on a list of potentially damaging activities (PDAs) which cannot take place without prior consultation with, and agreement of, the Authority. The legislation will enable the Secretary of State to impose a Stop Order requiring any activity to cease. The ultimate decision to proceed with formal designation will rest with the Secretary of State who will be required to make a decision within a few months (up to 6 months) of the publication of the interim management plan. If a decision to proceed is made, a formal management plan for the MPA will be prepared by a Management Committee for the area set up by the Authority for each proposed MPA. The Committee will be required to consult widely before finalising the plan which must be completed within two years. This formal management plan will then supersede the interim measures. The Committee will also be responsible for the detailed management of the MPA and implementation and review of the agreed plan but will be answerable to the Authority.

¹⁸ The MNR legislation refers to land covered continuously or intermittently by tidal waters and the landward limit has been interpreted as being highest astronomical tide level. In ecological terms this is an artificial boundary and could lead to parts of a valuable habitat being protected while the neighbouring land falls outside the boundary.

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6. Where land adjacent to a proposed Type 1 or Type 2 MPA is subject to a landscape or conservation designation the management plan should be developed to support the objectives of the land designation wherever possible.

7. In cases where Marine Protected Areas (MPAs) are designated by neighbouring states, the U.K. Government will enter into negotiations with the appropriate governments or bodies to consider whether the establishment of any Marine Protected Areas in U.K. waters could assist in achieving the conservation objectives of such designations. In the same vein the Government should support initiatives which advance the idea of Marine Protected Areas in other states.

2.2 "Type 1" Areas

1. Objectives

To provide for the regulated use of clearly defined areas of sea for the purposes of conserving special features of biological, geological, physiographical, archaeological, commercial, or aesthetic interest or of providing opportunities for research. Type 1 MPAs will be sites given strict protection where the presumption is against any activities unless licensed. All activities within the MPA will require permits¹⁹. Because of the necessity of strict control these areas will probably be restricted to territorial waters.

2. Designation

Designation will be in accordance with the procedures outlined above. Type 1 MPAs will generally be smaller than Type 2 MPAs and will often be designated within Type 2 MPAs, where they will provide additional protection to certain parts of the Type 2 MPA and/or where the Type 2 MPA acts as a buffer zone. A Type 1 MPA may also be designated outside the boundaries of a Type 2 MPA if its objectives can be met in such situations.

3. Management

Type 1 MPAs will generally be permanent, although some of the controls may operate on a seasonal basis, but there may be occasions when a designation is desirable for a limited period only, for example, to protect scientific research from interference, or to protect archaeological sites during excavation.

The management framework will be laid down in regulations made at the time of designation and subsequently by secondary legislation made by the Authority which will have powers to delegate detailed management functions to an approved body such as the Management Committee for a Type 2 MPA (see below), the Nature Conservancy Council, a sea fisheries committee, or a Management Committee set up specifically to manage the site.

2.3. "Type 2" Areas

1. Objectives

To provide for the regulated use of large areas of sea (eg sea loch systems, large bays) in a manner favourable to conservation. There will be a legal regime permitting unrestricted use

¹⁹ In the case of rights exercised under international law, such as freedom of navigation, support from the appropriate international organisation will be needed to fulfil this objective.

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of the area with the exception of activities expressly prohibited or regulated. Such areas need not be restricted to territorial waters but could extend to all waters under national control. The legislation would need to provide a mechanism for designation of such areas and their management. The regulation of activities within the area would be best achieved using subordinate legislation but the primary legislation would need to specify the form this should take.

2. Designation

Designation will be in accordance with the procedures outlined above. The options for the protection of Type 2 MPAs will be outlined in a set of Guidance Notes to be prepared by the Authority. These may include zoning, seasonal closures, the introduction of byelaws, voluntary initiatives and Type 1 MPAs.

3. Management

The formal management plan will be prepared for each Type 2 MPA by a Management Committee, made up of representatives of relevant interest groups, set up by the Authority, and will be subject to approval by the Authority. The management plan will cover all the activities which may take place in the area and specify how they are to be carried out without detriment to the conservation importance of the area.

Where existing bodies have statutory responsibilities for the control of activities that might impinge on the management of the area they shall be under an obligation to notify these to the Management Committee. A list of such bodies shall be included in a Schedule to the management plans. Any proposed change in, or intensification of such activities must be notified to the Management Committee who will have powers to alter the management plan accordingly. If the proposals are unacceptable to the Management Committee, the proposals must be referred to the Authority who will seek to resolve the conflict. Ultimate responsibility for deciding whether the proposals can go ahead will lie with the Authority.

New activities, which are not covered by the management plan when drafted, should be notified to the Management Committee who will be required to make recommendations on the appropriateness of such an activity in a Type 2 MPA. If the Authority decide that the said activity may be introduced, the Management Committee will provide guidelines and/or the Authority may make appropriate secondary legislation to ensure that the activity is carried out without affecting the objectives of the Type 2 MPA.

If any body listed in the Schedule fails to agree to a management plan before the designation of a Type 2 MPA that body shall comply with an interim management plan drawn up by the Authority for the period from the date of its publication until agreement is reached or a decision has been made not to proceed with formal designation. In the absence of such an agreement the interim management plan shall continue to have effect.²⁰

²⁰ The main purpose of this requirement is to prevent the quality of a site from deteriorating while negotiations proceed. In Strangford Lough, for example, the continuance of scallop dredging within the proposed reserve is destroying important communities, thereby lowering the conservation value of the site. The interim management plan, with its list of PDAs and the recourse to a Stop Order, would help to maintain the conservation status of the proposed site prior to formal agreement being concluded.

Implementation of the management plan for Type 2 MPAs will require the involvement and co-operation of all government departments and agencies with an interest in the area. There are also many activities with no specific legal controls. It will be the direct responsibility of the Management Committee to monitor such activities (mainly recreational). National Councils of sporting organisations will be invited to participate in the management of the MPA in order to ensure that these interest groups are fully represented on the Management Committee and are adequately consulted during the preparatory stages. They do not, however, have any legal responsibility for the actions of their members and not all recreational users of the sea belong to such organisations. Where recreational activity needs to be regulated, therefore, a permit system should be used, with general licences being issued where convenient.

The management of the MPA must include a monitoring programme, the object of which is to assess the amount of activity carried out within the MPA and to enforce the regulations. The development of a monitoring programme for an established MPA and the publication of results will be the responsibility of the Management Committee. Prior to designation, the Authority will be responsible for monitoring the proposed MPA site as part of the process of determining the nature and level of activities.

Management will be the responsibility of the Management Committee, which should be given wide powers of control over its areas in the same way that harbour authorities have under their enabling Acts. Input from other interested parties would be assured by legislating for the establishment of these Management Committees to be made up of representatives of relevant interest groups for the area. The primary legislation would also need to provide that other authorities must exercise any functions within the MPAs in accordance with the management plan.

3. HOW THE PROPOSALS RELATE TO EXISTING DESIGNATIONS

The variety of statutory and non-statutory conservation designations which are already used in the U.K. can be catered for using the approach outlined above. The suggested options simplify the current system as well as introducing stronger and more widely applicable site protection measures for the marine environment. The MPA scheme could be used to meet European and international conservation obligations such as Special Protection Areas²¹, Ramsar sites, Biosphere Reserves²² and World Heritage Sites²³. Traffic Separation Schemes²⁴, Prohibited Areas²⁵, Special Areas²⁶ and other shipping regulations could also be

21 Under the EC Birds Directive 79/409/EEC

22 Part of the "Man and the Biosphere" programme of UNESCO

23 Made under the Convention Concerning the Protection of the World Cultural and Natural Heritage 1972.

24 The main purpose of these is to prevent collisions in heavily used sea areas.

25 Properly known as "Areas to be Avoided by specified classes of ships", this is an IMO designation designed to reduce the risk of stranding.

26 Under the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78).

accommodated within the framework as could fisheries exclusion areas. The ability to encompass designations with such a wide range of purposes is one of the greatest strengths of the scheme in that it draws all sea uses together within an integrated framework while, at the same time, extending the concept of conservation to cover all aspects of marine exploitation. Use of these other designations is also of value in strengthening the case for an MPA designation. Other useful mechanisms for promoting the conservation objectives and implementing the management plans for MPAs include water quality zoning and fisheries byelaws. Thus legislation and procedures from sectors other than nature conservation can and should be used to further the aims of Type 1 and Type 2 MPAs. Simple amendment of relevant legislation in other fields could ensure that the conservation considerations of MPAs are accorded due importance²⁷.

On a national front, the introduction of the MPA scheme would remove the need for marine nature reserves and could be used to give greater strength to designations that presently work on a voluntary basis only. It would also enable a level of protection analogous to that of Sites of Special Scientific Interest on land to be introduced for the marine environment. This designation, as operated at present, is not really suitable for marine sites because of legal and practical difficulties in implementation²⁸. The scheme would also provide a unified framework for protection of archaeological features, including wrecks and military remains, as well as fisheries designations such as shellfish waters.

There are already several designations that apply to coastal lands, such as National and Local Nature Reserves, National Parks and Heritage Coasts. The MPA scheme is sufficiently flexible to accommodate the needs of any of these designations where designated sites adjoin an MPA and, indeed, can be used to further the objectives of the terrestrial designation offshore.

There are no terrestrial designations that precisely parallel the two MPA designations. National Nature Reserves meet some of the objectives of the Type 1 MPA but only private ownership, not available at sea, provides the full measure of control. Type 2 MPAs show similarities with National Parks, where most activities are allowed, subject to certain restrictions, but are more flexible and can be used to promote a variety of conservation purposes.

4. CONCLUSION

We believe that the proposals put forward in this document are an essential part of the management requirements for the protection of the seas around the U.K. Clearly there are many details that need to be considered, for example, the nature of the Authority and the landward limit of MPAs, but we have attempted to present a framework covering the essential ingredients of any MPA scheme. We hope that our proposals will give rise to informed debate on the best way to proceed.

27 For example, by giving byelaw-making authorities express powers to make byelaws for conservation purposes.

28 See Gubbay, S. 1989 Using Sites of Special Scientific Interest to Conserve Seashores for their Marine Biological Interest. WWF, Godalming, 29 pp. for a discussion of the implementation of this designation to conserve intertidal sites.

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The benefits of an integrated MPA management scheme are enormous, not only in terms of conservation interest, but also in financial terms, for example, in the field of fisheries and in pollution control. The North Sea Ministerial Conferences show that governments do have the political will to give higher status to the protection of the marine environment. The proposals in this document would simply carry the movement one stage further.

Appendix

The following people attended meetings of the working group on MPAs and/or commented on previous drafts of this paper. This list is intended as an acknowledgement of their help and should not be taken to imply that they necessarily endorse the final paper.

Swantje Brodie-Cooper, *The Marine Forum*

Bob Earll, *Marine Conservation Society*

Sarah Fowler, *The Nature Conservation Bureau*

Peter Fox, *British Association for Shooting and Conservation*

Alison Gale, *Isle of Wight County Archaeological Centre*

Robert Galvin, *Greenpeace*

John Gibson, *Cardiff Law School*

Susan Gubbay, *Marine Conservation Society*

Nancy Harrison, *Royal Society for the Protection of Birds*

Madeleine Havard, *World Wide Fund for Nature*

Penny Kemp, *Wildlife Link*

Isobel Macrae, *Greenpeace*

Peter Melchett, *Greenpeace*

Roger Mitchell, *Nature Conservancy Council*

Simon Pepper, *World Wide Fund for Nature*

Philip Rothwell, *Royal Society for the Protection of Birds*

Caroline Steel, *Royal Society for Nature Conservation*

Chris Tydeman, *World Wide Fund for Nature*

Lynda Warren, *Cardiff Law School*