MPAW 06

Ymateb gan: Gweithgor Morol Cyswllt Amgylchedd Cymru Evidence from: Wales Environment Link Marine Working Group

Consultation questions

Question 1

Has the management of Welsh seas received sufficient resource and strategic direction to enable sustainable management that supports the well-being of current and future generations? (250 words)

Welsh Government is committed to achieving 'clean, healthy, safe, productive and biologically diverse seas'. Only once we have achieved this are we able to fully realise the substantial economic, societal and wellbeing benefits of our MPAs².

It is our view that Welsh seas do not currently benefit fully from sustainable management, in part this is due to insufficient resource for the delivery of policy implementation, enforcement and monitoring. Failure in this regard is confirmed in the State of Natural Resources Report (SoNaRR) highlighting data deficiency: "The limited available information about our seas continues to pose a challenge to the sustainable management of marine resources" and declines in marine species and habitats⁴. Seven in every eight hectares of Natura 2000 sites in Wales are marine⁵. These sites are designated for specific features, and management objectives and decisions affecting the sites (principally determining what activities should be permitted, and how they should be managed) are typically very focused around these features. Critically, it has been estimated that 50% of European Marine Site (EMS) features are in unfavourable condition⁶.

Natural Resources Wales (NRW), who is responsible for environmental management, has also been affected by cuts equating to a 15% budget reduction in the last two years, as well as the loss of expertise through voluntary redundancy schemes.

Independent European Marine Sites (EMSs, also known as Natura 2000 sites) officers, who are responsible for aspects of EMS management, have lacked secure investment. Funding is often 'piecemeal' in nature, with ramifications for the scope of conservation measures and long term monitoring.

We argue there is a need for greater strategic direction from the Welsh Government. Policy initiatives that should result in better management of MPAs has been delayed, and slow to progress (e.g. "Assessing Welsh Fishing Activities" project⁸) as has strategic vision as to how to reduce cumulative and in-combination pressures on the Welsh MPA network with the available tools (e.g. the Wales National Marine Plan –[hereafter WNMP]).

The MPA Management Steering Group, chaired by the Welsh Government was established in 2014 to remediate this, following a recommendation from a 2012 Countryside Council for Wales (CCW) review⁹. There has been little

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69322/pb3654-marine-policy-statement-110316.pdf

² See page 16 for links with wellbeing: http://www.bbowt.org.uk/sites/default/files/files/Securing_The_Benefits.pdf

³ State of Natural Resources Report (SoNaRR), Chapter 6, p.31:

https://naturalresources.wales/media/679414/chapter-6-assessing-sm-achievement-final-for-publication.pdf ⁴ For example for sub-tidal habitats in SoNaRR, Chapter 3, p. 74:

https://natural resources.wales/media/679417/chapter-3-state-and-trends-final-for-publication.pdf

⁵Synthesis of Key Findings from the UK National Ecosystem Assessment, 2011: http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx

⁶ M. Hatton-Ellis, L. Kay, K. Lindenbaum, G. Wyn, M. Lewis, M. Camplin, A. Winterton, A. Bunker, S. Howard, G. Barter & J. Jones, 2012. MPA Management in Wales 1: Overview of current MPA management in Wales and a summary of new MPA management tools. CCW Marine Science Report 12/06/01, 56pp, CCW, Bangor

⁷ 2nd November, 2016: http://www.bbc.co.uk/news/uk-wales-politics-37847080

⁸ http://gov.wales/topics/environmentcountryside/marineandfisheries/marine-conservation-and-biodiversity/marine-protected-areas/AssessingtheimpactsoffishingactivitiesonMarineProtectedAreas/?lang=en ⁹ "Vision for the group: To secure effective management of MPAs in Wales that ultimately improves condition of our MPAs by safeguarding marine biodiversity, the wider ecosystem and the socio-economic benefits for Wales."

communication from this group, including for example, any official decision relating to the proposed 'spatial management approach', 10.

Ouestion 2

How should Area Statements, to be developed by Natural Resources Wales, cover Welsh seas? (For example should the sea adjoining each welsh Local Authority be included in its Area Statement, or should the marine environment be considered separately in one or more marine Area Statements?) (250 words)

Under the Environment (Wales) Act 2016¹¹, Area Statements (AS) should be developed in a way that addresses the priorities, risks and opportunities to ecosystem resilience in order to achieve Sustainable Management of Natural Resources (SMNR).

The Marine Plan has been identified as a key tool for achieving SMNR in the marine environment. Threats to the marine environment as identified in SoNaRR include broad pressures (e.g. climate change, 'Blue Growth' and overexploitation) and local pressures (e.g. agricultural run-off, litter and disturbance).

A national marine AS would provide an evidence base to better understand and mitigate the impacts of 'Blue Growth' (growth of marine development, which will be supported through the marine plan) through addressing cumulative pressures, identifying areas for ecosystem recovery and enhancement, and safeguarding areas of multiple benefits.

Conversely, sub-regional AS that intersect across the land-sea interface would help mitigate the impacts of terrestrial activities on the marine environment and foster improved engagement in marine management from those involved in terrestrial ASs such as Public Service Boards and NRW. There may also be value in identifying further sub-national areas that would benefit from application of the ecosystem approach through AS, such as areas important for multiple activities that are not fully addressed by the marine planning process, like fisheries and recreation.

As such, we consider that for AS to deliver on SMNR in the marine and coastal environment there should be a single national marine AS that overlaps with multiple sub-regional ASs that intersect the land-sea interface . Overlapping AS at different scales would also support co-management between stakeholders that is essential to sustainable management.

Question 3

How well are Wales' MPAs currently being managed?

(This can include aspects such as the condition of sites, staffing to deliver management, surveillance and enforcement activities and the data on the extent of activities taking place in MPAs) (250 words)

http://gov.wales/docs/drah/publications/151118-marine-protected-areas-management-steering-group-terms-of-reference-en.pdf

¹⁰ Consulted on in 2015

 $^{^{11}\} Hereafter\ referred\ to\ as\ the\ Environment\ Act:\ http://www.legislation.gov.uk/anaw/2016/3/contents/enacted$

Welsh MPAs are not currently well managed. In 2012, a CCW report highlighted that 47% of species and 54% of habitat features of Natura 2000 sites were in unfavourable condition. Of greater concern 100% of these species and 79% of these habitats were not under a secure management regime that could maintain or improve their condition ¹². In the five years since the publication of that report, addressing the causes of this should have been a key priority to ensure the long-term continuity of protected features.

Further evaluation from CCW¹³ identified key management issues across Wales, including:

- 1) A lack of supporting information to underpin site management: Data deficiency was highlighted again in 2016³ and is an ongoing barrier to assessing ecological trends and the effectiveness of management interventions¹⁴.
- 2) Site management processes and partnerships: including the lack of locally based site officers and gaps in communication e.g. between Regulating Authority Groups (RAGs) and some competent authorities
- 3) The lack of awareness and understanding from stakeholders: of note, public engagement is a substantive work area for EMS officers where they are in place
- 4) Legislative and policy framework: including the need for a better understanding of how biodiversity policy is compatible with wider policy drivers¹⁵
- 5) Resources¹⁶

Since 2012, there have been a number of initiatives around Wales (e.g. LIFE N2K project, EMS site restoration projects) but it is unknown to what extent this has altered the conservation status of features, as reporting is now at site rather than feature level making long term evaluation difficult.

Question 4

What are the key issues affecting the effective management of multi-use MPAs? (250 words)



¹² Please see reference note 4; these results are from the 2007, Article 17 reporting round.

¹³ M. Hatton-Ellis, L. Kay, M. Lewis, K. Lindenbaum, G. Wyn, A. Winterton, A. Bunker, S. Howard, G. Barter, M. Camplin & J. Jones, 2012. MPA Management Report 2: Assessment of current MPA management in Wales. CCW Marine Science Series No: 12/06/03, 78pp, CCW, Bangor

¹⁴ Acknowledging that monitoring in the marine environment is difficult e.g. trends for 68% of marine species and habitat Natura 2000 site features in the 2013 UK wide reporting to the EU were unknown: http://incc.defra.gov.uk/page-6565

¹⁵ See question 6 for more detail

¹⁶ See question 1 for more detail

Assess conservation status: Put in place assessment and monitoring practices that will enable us to determine the conservation status of the sites / habitats / species in order to measure progress towards favourable conservation status and Sustainable Natural Resource Management (SNRM) and prioritise management actions.

Restoration and enhancement: Allowing features to recover to a non-degraded state should be a priority if MPAs are to deliver towards a healthy and resilient marine environment that could sustainably support 'Blue Growth'.

Inclusive and transparent decision making: People who use the sea need a clear and authoritative voice in its management. Stakeholder engagement in MPA management in Wales is patchy, frustrating and ineffective.

Manage activities: The EU Nature Directives¹⁷ put in place a robust consenting process to determine what plans and projects can take place within MPAs. In doing so they provide a litmus test for sustainable development, as the consenting authority should only consent activities once they have ascertained that they are able to proceed without causing adverse effects on protected species and habitats. The level of activity (or use) within an MPA should thus be determined (and would vary between sites) in accordance with the needs of the site's features. We are concerned that the Welsh Government are not doing enough to regulate activities taking place within MPAs nor have a clear understanding of the growing cumulative pressure of multiple activities on protected sites in Welsh waters. This lack of clarity and commitment to regulate activity is damaging both for fishing operations, developers and the conservation objectives of MPAs¹⁸. For example, it remains unclear when the Welsh Government intends to prioritise the resources to manage fishing practices that have been identified as potentially damaging to features⁶, despite the possible ramifications for site integrity and conservation objectives.

Understand environmental limits: With regards to the Welsh Government's 'Blue Growth' agenda, the WNMP has not yet demonstrated whether strategically 'optimising the opportunities for sustainable growth' in four 'key' sectors¹⁹ can realistically be met whilst also achieving favourable conservation status of MPA features and more widely SMNR.

Question 5

Do existing Welsh MPAs currently provide the right protection for the conservation of Welsh marine biodiversity? (250 words)

¹⁷ The collective term for the EU Birds (http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN) and Habitats Directives (http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN)

This in addition to previous concerns around resourcing and a lack of strategic direction

19 The strategic direction of the WNMP is currently being determined. It is anticipated that the Plan will seek to support the growth of four key sectors (ports and shipping, aquaculture, tourism, and renewable energy) in Welsh waters through developing associated sector growth policies and by identifying spatially where the resource is to support these ambitions.

The majority of Welsh MPAs are designated under the EU Nature Directives¹⁸. As recently demonstrated²⁰, these Directives are fit for purpose, but must be properly implemented to achieve their objectives²¹. Where evidence is inconclusive, for instance, the Precautionary approach must be applied to MPA management decisions, – i.e. the competent authority must *ascertain* that a plan or project will not have an adverse impact on the integrity of the site. We have concerns that this approach is not always being applied.

There is some evidence that MPAs are not conceived as 'special'; e.g. one study found they are not avoided by Government and industry for damaging activities more than unprotected areas, with legal action or public campaigns required to achieve the protection the sites should have in the first place. MPAs must be seen as protected by all sectors²².

Marine habitats should be managed to achieve or maintain a certain type of condition for a specific species or habitat, to achieve this most marine conservation objectives rely on management measures being applied to activities to avoid impacts. Of these, spatial protection measures put in place to protect and restore species, habitats and ecological processes, underpin most of Wales' nature conservation targets²³. Many of these targets also identify the need to designate an ecologically coherent network of MPAs, that is greater than the sum of its parts, in delivering effective nature conservation²⁴ and resilient ecosystems. It is worth highlighting that all MPAs in Wales are "multi-use", i.e. there are no 'highly protected' or 'reference' sites, where all forms of abstraction (removal) or deposition (introduction) are prohibited. However, the existing legislation should allow such restrictions to be put in place if required to achieve conservation objectives.

The Welsh contribution to a UK wide MPA network is currently incomplete²⁵ with some species gaps, as well as a lack of sites across depth ranges and some offshore sub-littoral habitats. There is also insufficient protection for mobile species within the network as a whole. Designation of Marine Conservation Zones (MCZs) under the UK Marine and Coastal Access Act must be considered to protect nationally important species and habitats as part of the development of Wales' network.

Species and habitat protection measures outside of protected sites must also be effectively resourced to support an ecosystem approach and the coherence of the MPA network²⁶, as well as a greater understanding of how MPAs can be enhanced through wider marine management, including the Marine Plan, the Marine Strategy Framework Directive etc. A range of management measures are needed to support mobile species²⁷ (e.g. increasing the selectivity of fishing gears and reducing pressures from underwater noise), and further investment towards understanding how multiple benefits can be derived from 'Blue Growth' initiatives (e.g. aquaculture) to support areas of sea outside of MPAs. This reflects the need to consider ecosystem health and resilience, and the importance of SMNR in the marine environment.

Question 6

What lessons can be learnt from current MPA management activity in Wales (including designation, implementation and enforcement)? (250 words)

²⁰ http://ec.europa.eu/environment/nature/legislation/fitness_check/index_en.htm

²¹ Please refer to answers 1, 3 and 4

²² Simmonds M, Green M, James V, Eisfield S and Lott R. 2012 Towards an evaluation of the effectiveness of MPAs for cetacean conservation in Wales. IWC Scientific Committee paper SC/64/E6

²³ These include targets under the Convention on Biological Diversity; OSPAR; the EU Nature Directives and the Marine and Coastal Access Act

²⁴ http://www.ospar.org/work-areas/bdc/marine-protected-areas

²⁵ http://jncc.defra.gov.uk/pdf/JNCC_NetworkProgressWelshWaters_Final.pdf

²⁶ Recognising that some threats cannot be mitigated through site management alone

²⁷ Green M. Cadell R, Eisfield S, Dolman S and Simmonds M. 2012. Looking forward to 'Strict Protection': A critical review of the current legal regime for cetaceans in UK waters. WDCS Chippenham

Despite a large area of inshore waters being included within MPAs²⁸, the marine environment around Wales continues to decline, indicating that designation without investment in proper implementation and enforcement is failing in the delivery of conservation objectives.

Reports from Skomer MCZ highlight the extent of resources required to implement effective management and monitoring, where there is long-term data available for ca. 30 different variables²⁹. Consistent monitoring; a strong and specialised volunteer base; full time staff; all working in partnership have all benefitted this site, along with investment in new technologies that can aid in monitoring and data gathering³⁰.

European Marine Site Officers, though chronically under-resourced, have delivered a huge number of initiatives spanning feature restoration work, facilitation of partnership working, education and awareness raising. The latter has resulted in area specific Voluntary Codes of Conduct, which in the absence of national guidelines has helped mitigate negative impacts on the marine environment from, for example, recreational use³¹.

Case-studies of MPA management, published in 2008, identify mis-understandings around; policy, lack and/or mis-communication, and low aspirations in preventing damage to features, as causes for failures in management³². There is little indication that these issues have since been remediated³³. In addition, the statutory process required for management of activities is often lengthy³⁴. Addressing these concerns requires strong leadership, better communication and more reactive management.

Wales already has a large amount of expertise and best practice; small networks of people mean that this can be easily transferred. However continuity in both people and practice is essential and progress can be impeded by uncertainty. Success even on a large scale is achievable but requires clear and decisive actions from competent authorities, willingness to work with the legislation to achieve the conservation objectives and more reactive marine management. The Welsh Government and NRW also have to work with other UK administrations to ensure that cross border sites are co-operatively managed.

Question 7

Are there MPA examples or practices elsewhere that Wales can learn from? (250 words)

²⁸ Please note that protection is only conferred to the features and not the site as a whole

²⁹ https://naturalresources.wales/media/678021/project-status-report-2015_16-screen.pdf

³⁰ Electronic Monitoring in Fisheries Management, 2015, WWF-UK

³¹ Please see Prior, S (2011) *Investigating the use of voluntary marine management in the protection of UK marine biodiversity*. Report to Wales Environment Link for a critique of the use of voluntary management measures: http://www.pembrokeshiremarinecode.org.uk/wp-content/uploads/2011/12/WEL-Voluntary-Marine-Management-2011.pdf

³² Jackson E.L., Langmead O., Evans J., Ellis R. & Tyler-Walters H. 2-008. Protecting nationally important marine Biodiversity in Wales. *Report to the Wales Environment Link from the Marine life Information Network (MarLIN)*. Plymouth: Marine Biological Association of the UK

³³ These concerns were also flagged in the 2012 CCW review of MPA management, see question 3

³⁴ Example of Whelk fishery, which is currently being fished unsustainable: The Welsh Government could not invoke emergency fisheries orders and thus management could only be put in place through a statutory instrument. This takes time, during which the fishery has continued with less appropriate management (pers. Comms. Welsh Government Fisheries team)

Context varies and there is no single best example of site management that will fit all²⁸. MPAs do not exist in isolation and should be integrated into and bolstered by wider marine management. In Wales, the Environment and Wellbeing of Future Generation (Wales) Acts³⁵ also provide the legislative drivers for a bespoke and forward thinking approach, in combination with the existing legislation behind MPAs and wider marine management. That said lessons can be learnt from the following case-studies: the Community of Arran Seabed Trust (COAST) and Lundy MCZ.

COAST³⁶ is a community group and demonstrates how a local initiative can develop examples of good practice. At its core a sense of ownership over a common resource. The group aims to reverse the visible decline in Arran's marine habitats and has actively sought to protect their marine environment through; establishing a No Take Zone (NTZ); bringing about legal enforcement measures within the MPA; building strong research partnerships; driving forward sustainable fisheries initiatives; developing and delivering awareness raising programmes; providing a voice for the community and the marine environment in campaigning for wider change; and supporting local employment and income opportunities.

In Lundy, we find an example some elements of good practice though there is room for improvement. Strong partnership working has helped deliver targeted results for conservation. This includes, for example, the successful eradication of rats on the island that has allowed seabird populations to start recovering at their nesting site (further protection is needed for them at sea)³⁷, as well as the clear zonation of activity within the MCZ. This zonation incorporates a mutually agreed upon NTZ that was instated through fisheries bylaws. Management is conducted in partnership with meetings occurring between statutory groups, stakeholders and users of the MCZ bi-annually. These meetings provide a forum to discuss the management of the MCZ as well as an occasion for issues and concerns to be addressed directly³⁸. External research has also highlighted the economic benefits of the MPA, and additional benefit from the NTZ.³⁹

These are just a few examples of how the issues identified in Welsh MPA management have been avoided and/or addressed elsewhere.

Question 8

The majority of Wales' MPAs are designated under the EU Habitats Directive. How should the Welsh Government's approach to MPA management take account of the UK's decision to leave the European Union? (250 words)

³⁵ Please see reference 11; Wellbeing of Future Generations (Wales) Act 2015, hereafter referred to as the Wellbeing of Future Generations Act: http://www.legislation.gov.uk/anaw/2015/2/pdfs/anaw_20150002_en.pdf; Environment (Wales) Act 2016: http://www.legislation.gov.uk/anaw/2016/3/contents/enacted

³⁶ http://www.arrancoast.com/

http://www.rspb.org.uk/community/ourwork/b/martinharper/archive/2016/07/29/friday-success-puffins-bounce-back-on-lundy.aspx

³⁸ http://www.lundymcz.org.uk/conserve/conservation-management

³⁹ Char D.R., Wattage P. & Pascoe S., 2012. Recreational benefits from a marine protected area: A travel cost analysis of Lundy. *Tourism Management* 33, 971-977

As noted above, with the exception of Skomer and coastal/intertidal SSSIs, all of Wales' MPAs are Natura 2000 sites – designated under the EU Habitats and Birds Directives, transposed into domestic law via Regulations. It is imperative that these Regulations – supporting site designation and management, are not lost with the UK's exit from the EU. It is important to note that, unlike the majority of terrestrial Natura 2000 sites which are underpinned by SSSIs, European Marine Sites are not underpinned by any domestic designation.

The how and why behind effective management of MPAs did not change on the 24th of June⁴⁰. However, in leaving the EU, Wales will almost certainly lose the European Commission and European Court of Justice as powerful tools in accountability and in driving forward the implementation of EU laws. There must be a replacement, affordable way of access to justice to enforce protection. The UK will still be subject to the Aarhus convention on access to environmental justice. The need to restore and enhance the environment and not downgrade on current levels of protection must be central to the negotiating process.

Cross-border collaboration around the UK for the establishment of an ecologically coherent network of MPAs remains critical. WWF's report⁴¹ shows that significant gaps exist in the Celtic Seas MPA network, particularly in the offshore area, highlighting the need for Governments across the UK, Ireland and France to work together to coordinate their work to deliver an ecologically coherent network.

Wales, and the UK, is also likely to lose access to an evolving knowledge base and guidance in monitoring and enforcement processes, as developed under the MSFD, as well as financial support for wider marine management e.g. the eventual loss of European Marine Fisheries Fund (EMFF). For example, the EU commission will draw up plans to improve implementation and increased investment, following the Nature Directives fitness check²⁰. Proper implementation of what we have, targets for consistent and effective MPA management, as well as transparent partnership working with industry, NGOs and other stakeholders to fulfil monitoring and enforcement needs, will be important moving forward.

As well as shoring up current levels of protection conferred by European legislation, Wales must fully utilise domestic legislation and the Marine Conservation Zones designations, whilst still driving for stronger, better standards. Current predictions indicate that the 2020 Aichi Biodiversity targets⁴² globally won't be met and Wales has already missed the OSPAR 2016 deadline of a well-managed ecologically coherent network of MPAs⁴³. However research has demonstrated that if provided with good management, MPAs can bring economic, social and environmental benefits⁴⁴

Ouestion 9

If you had to make one recommendation to the Welsh Government from all the points you have made, what would that recommendation be? (250 words)

 $^{^{40}}$ http://www.waleslink.org/publications/by-work-area/11

⁴¹ Rees, S., Foster, N., Langmead, O., Griffiths, C. (2015). Assessment of the Ecological Coherence of the MPA Network in the Celtic Seas: A report for WWF-UK by the Marine Institute, Plymouth University and The Marine Biological Association of the United Kingdom. pp 165.

⁴² http://www.birdlife.org/campaign/national-commitments-fall-short-action-needed-safeguard-nature
⁴³ Given that the JNCC assessment of Wales' network of MPAs was published in December 2016, Wales has also missed the OSPAR target for designating as ecologically coherent network of MPAs by 2012 and to ensure it is well-managed by 2016.

⁴⁴ http://www.piscoweb.org/publications/outreach-materials/science-of-marine-reserves

We recommend that the Welsh Government prioritise resourcing as a matter of urgency in order to effectively manage MPAs around Wales. The Welsh Government must put the health of the marine environment over short term economic gain and where needed work with any affected groups to build understanding, resilience and adaptability. As discussed in previous examples, good management does not preclude all activity but it ensures the longer-term health of species, habitats and ecological processes that underpin many of the wider benefits that are derived from a functioning ecosystem. The ramifications of mis-management are and will continue to be felt across Wales into the long-term. It must be recognised that protected area management in the marine environment is about regulating human activities so that ecosystems can recover and be resilient.

Measures include the resourcing of independent site officers who are distinct from NRW, the Welsh Government, NGOs, industry and wider political processes. This independence is essential in mediating between wide varieties of groups, whilst remaining focussed on management objectives.

In addition there must be an emphasis on clear enforcement at the licensing stage and at sea. This should be incorporated into a wider communication strategy to build understanding with marine users as to the value and benefits of MPAs.

Finally, a greater understanding of ecological processes and the relative success or failure of management of MPAs in relation to their conservation objectives is essential. Recognising that this is an expensive and difficult barrier to working in the marine environment, solutions must be found and adapted over the short, medium and long-term.

Question 10

Do you have any other comments or issues you wish to raise that have not been covered by the specific questions? (250 words)

Many of the concerns and issues discussed in this evidence have been identified in the past. Independent of political time frames, the links between legislation, policy and action at site and ecosystem level must be consolidated to ensure effective marine management.

It is by ensuring wider ecosystem health and resilience that MPAs can support the delivery of "economic, social, environmental and cultural benefits" more widely. Attempting to maximise only the benefits we receive from MPAs, without regard to the fundamental delivery mechanism, would result in long term depleted natural resources, biodiversity loss and an ecosystem that cannot adapt to future challenges.

Building on previous points in this evidence on the need to prioritise long-term benefits over short term gain: the 2016-2021 Programme for Government⁴⁵ is ambitious in setting growth targets, which is reflected in the Marine Plan, for example for tourism⁴⁶, aquaculture⁴⁷ and renewables⁴⁸ in the marine environment. The Environment Act and the Wellbeing of Future Generations Act establish in domestic legislation the need for the Welsh Government to consider opportunities for sustainable management of natural resources in order to achieve resilient ecosystems and secure long-term benefits for future generations. This means that the sustainable growth of maritime industries must happen in the context of environmental limits; a focus on achieving SMNR (noting that the marine environment has already been established as having issues with resilience⁴⁹) is necessary to ensure these limits are recognised. Though it requires bolder action, achieving and future proofing effective and sustainable marine management (within that, MPAs that deliver on their objectives) is essential to secure a healthy marine environment and the associated long lasting benefits.

⁴⁵ http://gov.wales/docs/strategies/160920-taking-wales-forward-en.pdf

 ⁴⁶ Growth of tourism by 10% by 2020 is an aspiration in the Welsh Governments 'Partnership for Growth: Strategy for Tourism 2013-2020'. http://gov.wales/docs/drah/publications/131127-marine-and-fisheries-strategic-action-plan-en.pdf
 47 http://gov.wales/docs/drah/publications/131127-marine-and-fisheries-strategic-action-plan-en.pdf

http://www.marineenergypembrokeshire.co.uk/welsh-government-launch-new-energy-strategy-and-lead-the-drive-to-develop-a-competitive-marine-energy-sector-in-wales/

⁴⁹ State of Natural Resources Report, Chapter 4, p 25. https://naturalresources.wales/media/679405/chapter-4-resilience-final-for-publication.pdf

