

Lynn Fardon
Domestic Fisheries Reform
Area3D
Nobel House
17 Smith Square

By Email

Annwyl/Dear Lynn,

Consultation on the Strategic Environmental Assessment of the European Maritime and Fisheries Fund (EMFF) Operational Programme – Environmental Report

Thank you for consulting the Natural Resources Body for Wales (Natural Resources Wales) on the above document. The purpose of the Natural Resources Wales (NRW) is to ensure that the environment and natural resources of Wales are sustainably maintained, sustainably enhanced and sustainably used now and in the future. Our comments are therefore provided in the context of this remit and our role as a consultation body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004, as further amended by paragraph 189 of the Natural Resources Body for Wales (Functions) Order 2013, and as advisers to Welsh Government on the natural heritage and resources of Wales and its coastal waters.

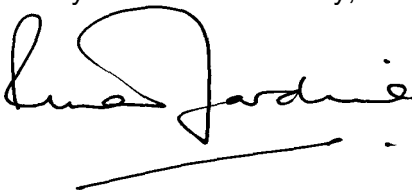
Natural Resources Wales welcomes and supports the strategic assessment of the European Maritime and Fisheries Fund Operational Programme. We consider that a robust strategic assessment of the environmental issues associated with the Programme is necessary to reduce risks and uncertainties of impacts to the environment from future funded projects. However Natural Resources Wales has been unable to provide a comprehensive response due to the limited 4 week consultation time period.

In the following Annex we have provided limited comments on the scope and details of the SEA.

If you have any questions regarding this response please contact our Marine Fisheries Advisor Colin Charman (Colin.Charman@cyfoethnaturiolcymru.gov.uk or 03000 654965)

Please note that any future SEA consultations should also be sent to the NRW strategic assessment gateway at: strategic.assessment@cyfoethnaturiolcymru.gov.uk

Yn Gywir / Yours sincerely,



Rhian Jardine
Head of Sustainable Communities / Pennaeth Cymunidae

Annex 1

Biodiversity, Flora and Fauna

1. The Biodiversity Flora and Fauna Section does not include protected species or habitats outside of Marine Protected Areas, with the exception of Habitats Directive Annex II species.
2. Biodiversity Action Plan habitats and species and OSPAR threatened and declining habitats and species have not been considered within the SEA.
3. Non natives are not mentioned in Section 4.1, although they are in other parts of the document.
4. It is not clear why MSFD is included under the Water Section but not in the Biodiversity Flora and Fauna Section. If it were included then the descriptors for biodiversity, non native species and food webs would need to be added to the 'Biodiversity Flora and Fauna' section.
5. Objective 4 Article 43 the development of infrastructure could have direct environmental impacts if done in a manner that isn't sensitive to the environment and could also have indirect impacts if it led to the expansion of fishing in the area. Similarly there are risks with expansion of aquaculture and introductions of non natives that aren't adequately reflected in the tables.
6. Section 9, Monitoring. In most cases we think project level monitoring will be more useful than plan level monitoring and should be a requirement of project level funding if there is potential to impact protected features.

Seascapes

7. P10 Table F – fostering marketing and processing. There is potential for some positive impact on 9 (Cultural heritage) and 10 (landscape) through promotion of place based products
8. P15 Table 1 item 10 'to maintain and where feasible enhance seascape and landscape character and visual amenity' – add indicators:
 - Number of existing or new activities using place (i.e. the landscape or seascape) to promote or market the product to customers and
 - Number of aquaculture facilities supported with open water enclosures
9. Section 4.7.1 some non statutory designations would also be relevant here, namely "Heritage Coast" (England, Wales, Northern Ireland) and "Wild Land" (Scotland).

10. P60 Fig 7.5 and objectives 9 and 10 – There is potential for some positive impact on 9 (Cultural heritage) and 10 (landscape) through promotion of place based products
11. P68 last table row (seascape/landscape) – There is potential for significant cumulative seascape and visual effects where the fund stimulates new or expanded fish farms with open water cages.
12. P71 Table 9.1 item 10 – wrong measure. The issue would not be represented by the indicator proposed. Also there are no ‘designated seascapes’. A more sensitive measure would be “Number of fisheries or aquaculture activities with open water cages in or adjacent to designated landscapes”.
13. UP1.4_Art42 matrix – Landscape/seascape – amend - potential positive impact where place-based marketing used to promote products to customers
14. UP1.4_Art47 matrix – Landscape/seascape – amend – wrong to assume no impact on the assumption that others will mitigate (planning control). Potentially significant negative impacts – of aquaculture development with open water cages. Reality is planning control does not prevent this type of development and in parts of UK aquaculture developments have been allowed and already have significant impacts on landscape/seascape.
15. UP1.4_Art66 matrix – Landscape/seascape – amend – potential for positive impact where marketing uses place (i.e. landscape / seascape) as selling point (Tay Salmon, Craster Kippers, etc)
16. UP1.4_Art68 matrix – Landscape/seascape – amend - potential for positive impact where marketing uses place (i.e. landscape / seascape) as selling point (Tay Salmon, Craster Kippers, etc)

Water

17. Section 4.3.1 when quoting status and number of water bodies need to provide source and year of classification.
18. Last sentence under WFD 4.3.1.1 ‘Objectives have been set through the relevant River Basin Management Plan for all water bodies that are not currently at Moderate status or worse in order to bring them up to Good status, within a prescribed timeframe.’ Reads poorly and not entirely true. If the water body is good or better then objective is no deterioration. If water body is moderate or worse then it is no deterioration and good status.
19. In box: ‘A trend analysis of nitrogen and phosphorus inputs from UK rivers and atmospheric deposition showed that over time, inputs of nutrients to the marine environment are generally decreasing.’ A reference is needed for this information, this does not reflect the expected situation in Wales.