

www.defra.gov.uk

Summary of responses to the public consultation on the draft Marine Bill from 3 April 2008 – 26 June 2008

September 2008

Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR
Telephone 020 7238 6000
Website: www.defra.gov.uk

© Crown copyright 2007
Copyright in the typographical arrangement and design rests with the Crown.

This publication (excluding the royal arms and departmental logos) may be re-used free of charge in any format or medium provided that it is re-used accurately and not used in a misleading context. The material must be acknowledged as crown copyright and the title of the publication specified.

Information about this publication and further copies are available from:

Marine Bill Team
Defra
Area 2C
Nobel House
17 Smith Square
London, SW1P 3JR

Tel: 08459 335577

Email: helpline@defra.gsi.gov.uk

This document is available on the Defra website:
<http://www.defra.gov.uk/corporate/consult/marinebill/summary-responses.pdf>

Published by the Department for Environment, Food and Rural Affairs

Contents

1. Executive summary (pp 4-8)

Introduction and background

Analysis methodology

Number and composition of consultation respondents

2. Key conclusions

A. Overarching themes (pp 9-12)

Clarity

Co-ordination across the land-sea interface

Devolution

Duties

Roles and responsibilities

Stakeholder engagement

Accountability

B. Key conclusions by policy area (pp 13-36)

Marine Management Organisation (pp 13-15)

Marine planning (pp 16-17)

Marine licensing (pp 18-19)

Marine nature conservation (pp 20-22)

Marine fisheries management (pp 23-25)

Migratory and freshwater fish (pp 26-27)

Enforcement (pp 28-29)

Coastal access (pp 30-33)

Data (pp 34-35)

Impact Assessment (pp 36)

Annexes

Annex A- Glossary of terms (pp 37-38)

Annex B- List of Consultees (pp 39-47)

Executive summary

Introduction and background

UK waters present a rich and valuable resource. The Marine Bill introduces a framework for the management of the marine environment, integrating conservation and socio-economic objectives to provide maximum benefit for all marine users whilst protecting marine resources.

The Bill was published in draft on 3 April 2008 and opened up to full public consultation via the Defra website, in order that interested parties might contribute their opinions to the development of the Bill. Consultees were asked for their views on whether the proposals set out in the draft Bill would deliver the outcomes that the Government would hope to see. Public consultation closed on 26 June 2008.

An interim summary of consultation responses was conducted, focusing on the responses of 32 key organisations to provide an overview of reactions to the draft Bill. This summary builds on that interim study to analyse all of the responses to the public consultation.

Analysis methodology

The methodology broadly comprised the following activities:

- Collection and collation of the responses
- In-depth analysis of each response.

Responses to the consultation were received in a variety of different formats. In order to conduct a thorough and consistent analysis, these responses were collected in a central, electronic database as well as being printed and organised into a supplementary hard copy database. Responses were then categorised by the policy area (or areas) within the Bill that were commented upon. This information was recorded in an electronic spreadsheet.

Once all the responses had been collected and organised in this way, an in-depth analysis was conducted of the responses.

Responses were first assessed to gauge the attitude to the proposals of each policy area; this was used to build up a snapshot of the overall level of support among respondents. In order to explore the attitude towards legislation in greater detail, a thematic content analysis was conducted. This involved assessing each response in-depth and assigning 'key statements' that reflected the most common statements made or positions taken by respondents. Statistical analysis was then conducted to build up an overall picture of how many respondents identified with a certain key statement, thus identifying the strongest themes.

Responses were then subject to further consideration and incorporated into ongoing policy development in the form of the command paper entitled 'Taking forward the Marine Bill: The Government response to pre-legislative scrutiny and public consultation.' This paper sets out how the proposals of the draft Bill will be taken forward in light of the responses received to the public consultation, as well as the recommendations received through pre-legislative scrutiny.

Number and composition of consultation respondents

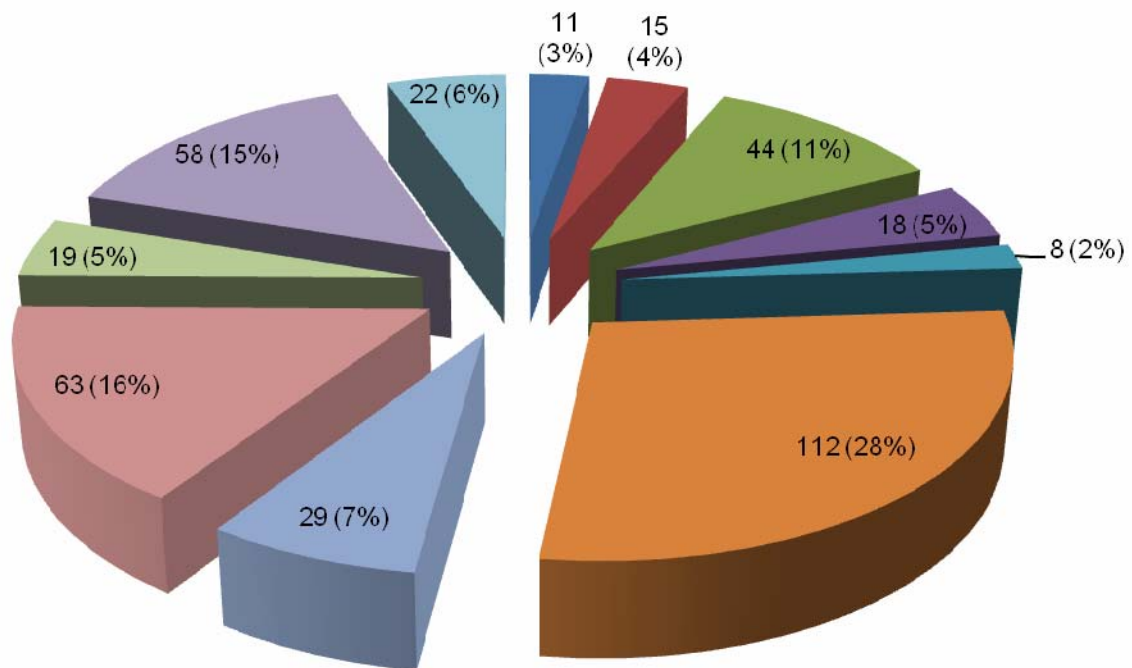
In total there were 3,899 consultation responses; these comprised 3,500 campaign-based responses and 399 non-campaign responses^A. Campaign responses were almost identical in content as respondents had been provided with a standard template by the organising campaign, whereas non-campaign responses were not identical to any other response.

Although campaign responses represented the majority of the overall sample, they were near identical in nature. The focus of this analysis is therefore primarily on the non-campaign responses received.

^A These figures differ to those included in the interim summary as in-depth analysis necessitated changes to the categorisation of some responses.

Number of non-campaign responses received by sector

The following pie chart shows the number of non-campaign responses received, categorised by sector^B:



Total- 399

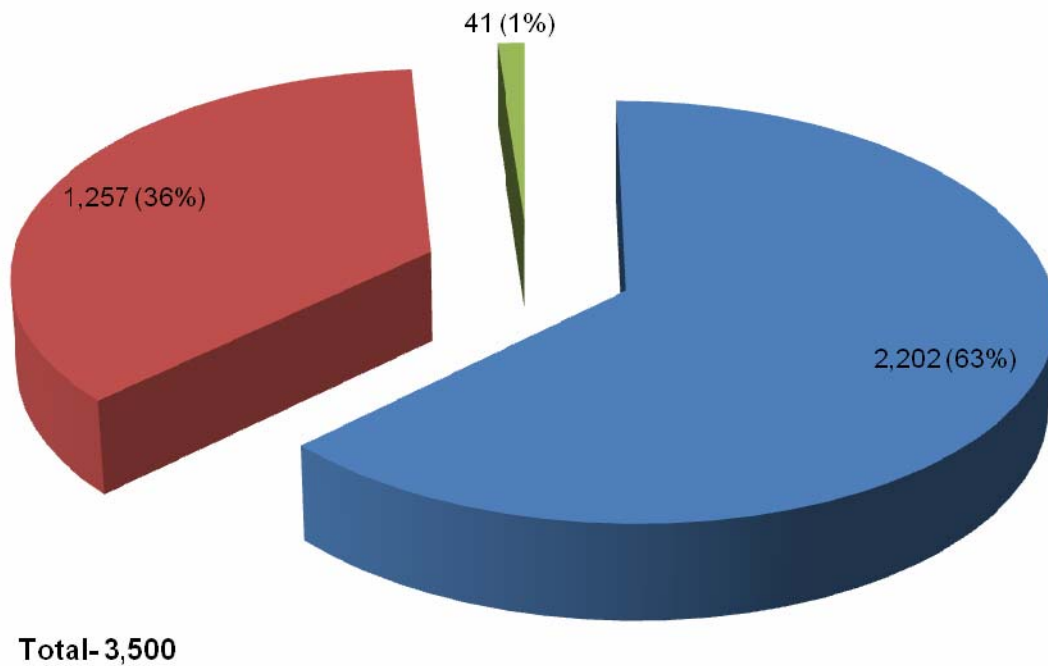
- Academic / research
- Energy supply industry
- Environmental
- Fishing
- Heritage
- Individual
- Local government
- Other non-governmental organisations (NGO)
- Ports & shipping
- Public bodies
- Recreational

For the purposes of this summary, a non-governmental organisation is defined as an organisation 'not belonging to or associated with any government' (Concise Oxford English Dictionary, Tenth Edition, 2002). The other non-governmental organisations sector includes bodies of this type not belonging to other sectors. Where relevant, and where one type of NGO was predominant among a sample of 'other NGOs,' the type of NGO represented (such as a private estate or coastal partnership) has been named in the following summary.

^B The figures presented here differ to those included in the interim summary as in-depth analysis necessitated changes to the sector categories and categorisation of some responses.

Number of campaign responses received by campaign

The following pie chart shows the number of campaign responses received, categorised by campaign,^C excluding around 11,000 postcards received from the Rambler's Association supporting the coastal access provisions in the draft Marine Bill.



■ Royal Society for the Protection of Birds (RSPB) ■ International Fund for Animal Welfare (IFAW)

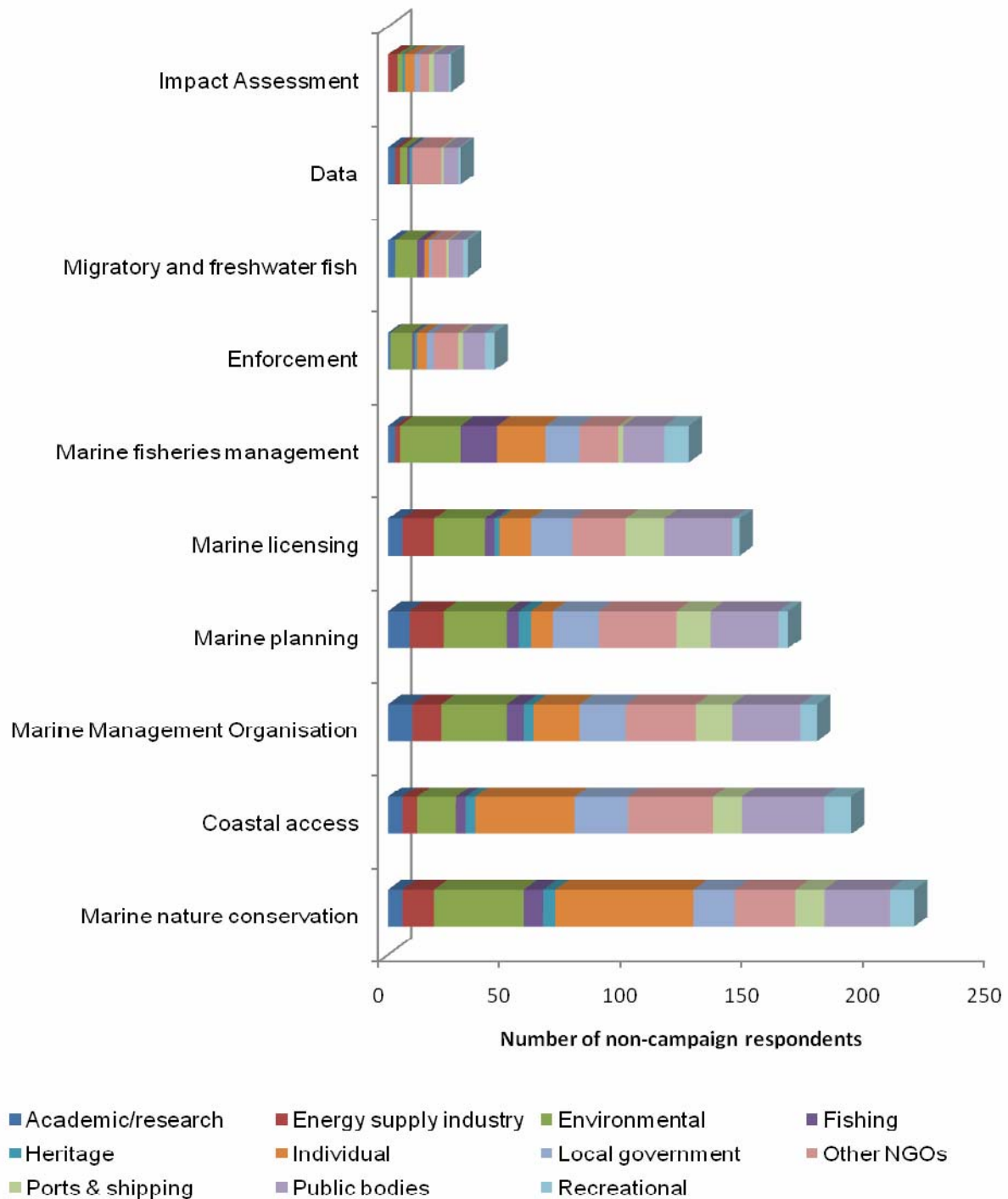
■ Friends of the Earth

The Friends of the Earth campaign ('No Plaice to Hide') took the form of postcards sent to the respondents' local MPs. 41 submissions were received from MPs. Of these, 7 noted that multiple postcards had been received, but did not include the total number of postcards received.

^C The figures shown here differ from those included in the interim summary as in-depth analysis necessitated changes to the campaign categorisation of some responses.

Number of non-campaign responses to each policy area

The following bar chart shows the number of non-campaign responses that addressed each of the policy areas within the Marine Bill, categorised by sector^D. Most responses addressed more than one area, so the total number of respondents shown here is larger than the total number of non-campaign responses received.



^D The figures shown here differ to those included in the interim summary as in-depth analysis necessitated changes to the categorisation by policy area of some responses.

Key Conclusions

Overarching themes

Respondents were generally supportive of the proposals of the draft Bill. Whilst respondents tended to address specific points of legislation, a number of overarching themes can be identified from their comments. The most common of these are discussed below.

Further details on specific comments, including statistics, can be found within the key conclusions by policy area (pp 12-34).

Clarity

Respondents sought clarification on proposals and approaches across the range of policy areas; requesting further details on aspects of the Bill as well as raising points that had not been included in legislation. Respondents also requested further clarification of the definitions and terminology used within legislation.

Comments focused on areas such as the timescale and procedure of transitional periods, particularly in relation to the establishment of the Marine Management Organisation (MMO) and new marine planning and licensing arrangements. Also addressed was funding, with respondents requesting clarification on the responsibility and provisions for funding the MMO, Inshore Fisheries and Conservation Authorities (IFCAs), increased coastal access and the live fish movement scheme included in the migratory and freshwater fish proposals.

Clarity was also sought in regard to the relationship between the draft Bill and other domestic and European legislation.

The request for clarity was a central thread running through responses, arising in the following further overarching themes.

Co-ordination across the land-sea interface

Respondents emphasised the importance of marine processes being consistent and co-ordinated with terrestrial processes in enabling the holistic management of resources on both land and sea.

Clarity was sought on the relationship between marine and terrestrial legislation as well as between bodies and the mechanisms to be used. This included the relationship between the Marine Plans and National Policy Statements (NPSs), as well as between the MMO and the Infrastructure Planning Commission (IPC).

Respondents focused particularly upon coastal areas, where the overlap of jurisdictions between marine and terrestrial bodies would be concentrated. Respondents questioned how this overlap would be negotiated, recommending the forging of strong working relationships as well as the common approach of Integrated Coastal Zone Management (ICZM).

Proposals in the draft Bill were also compared to existing terrestrial standards, with respondents proposing, for example, that the criteria for designating Marine Conservation Zones (MCZs) co-ordinate with those for identifying land-based Sites of Special Scientific Interest (SSSIs).

Devolution

Devolution was a central concern for respondents across the range of policy areas.

Respondents sought clarity on the form that legislation and implementation would take for the UK Government and Devolved Administrations respectively, and how this would affect the efficacy of the Bill across the UK.

Concerns were raised as to the degree of consistency and co-ordination between administrations, which was felt to be a crucial factor in the effective implementation of the proposals in the Bill. Respondents called for robust working relationships between new marine bodies and processes established by the UK Government, such as the MMO and marine planning, and any that may be established by the Devolved Administrations.

It was further emphasised that certain issues should override political boundaries and jurisdictions, including marine planning and the collection of marine data. Respondents proposed that planning areas be identified by ecological limits, rather than political ones, allowing for a consistent approach in cross-border areas. It was also suggested that the MMO act as a central body for data management, co-ordinating marine data across the UK.

Several respondents also requested further detail on the implementation of the draft Bill in the UK Overseas Territories and Crown Dependencies.

Duties

Respondents addressed the issue of duties in relation to actions to be completed, but also in terms of consultation and commitment to ideals.

In certain policy areas, it was proposed that powers be replaced with duties. In relation to marine nature conservation, respondents called for a duty on the relevant authorities to designate MCZs. In marine planning, an obligation to prepare and adopt marine plans was suggested. Several respondents urged that these duties should be associated with timescales for implementation.

The duty to consult was another important proposal, with respondents seeking modification of existing duties as well as the introduction of new duties. For example, in marine licensing, statutory consultees to decision making were called for.

It was also proposed that the duty on public authorities to consult Statutory Nature Conservation Bodies (SNCBs) in relation to activities that could affect MCZs be made stronger.

It was further suggested that the MMO and the IPC (as well as other bodies that the MMO may work closely with) have a duty to co-operate with one another so that the full potential of the legislation could be realised.

Duties were also addressed in relation to the underlying principles of the draft Bill, with respondents urging that the Environment Agency's duty in relation to migratory and freshwater fish be modified to include maintaining biodiversity and promoting the socio-economic value of fishing.

Roles and responsibilities

The roles and responsibilities of bodies across the legislation were commented upon, with clarification and modification sought in some cases.

Clarification was sought by respondents on the roles of bodies referred to in the draft Bill, as well as the interaction of those roles. In relation to the MMO, further details were requested on the responsibilities given to this body as well as to other bodies working in the same field, such as the IPC, the Environment Agency, local government and SNCBs. It was also suggested that the respective responsibilities of the MMO and the IPC be adjusted, with many respondents in favour of the MMO managing all marine projects irrespective of size.

Respondents urged that bodies working in the same field recognise the inter-dependence of their roles, and develop strong working relationships accordingly.

Also suggested was the introduction of certain roles. Noting that no one body had been given responsibility for the everyday management of MCZs, respondents asked that a body be tasked accordingly.

Stakeholder engagement

Stakeholder engagement was another area that was highlighted as crucial to the success of the draft Bill's proposals.

Engagement was interpreted in a number of different ways: through direct involvement and partnerships, as well as through consultation and communication with stakeholders.

Respondents championed the direct involvement of their organisation or sector, for example, in calling for a place on the MMO Board or in the advisory and consultative groups for marine planning.

The importance of extensive consultation and effective communication with stakeholders and the general public was emphasised in responses throughout the range of policy areas, particularly in relation to marine planning, coastal access, marine licensing and MCZs. Engagement and communication were presented as twin routes to the effective implementation of legislation and the negation of conflict, and thus to the long-term success of the Bill's proposals.

Accountability

Respondents called for new marine mechanisms to be open to stakeholders and the general public not only for engagement but also for scrutiny, to ensure the accountability of new bodies and proposals.

Accountability was identified as a central priority across the range of policy areas. Some respondents urged that the membership and working of bodies such as the MMO and IFCA be transparent and accountable, and that mechanisms be put in place to monitor their performance and make adjustments where necessary.

Respondents were keen that robust mechanisms for public scrutiny be established. In relation to marine planning it was proposed that provisions for public scrutiny follow those for terrestrial planning, including clear consultation and a public examination.

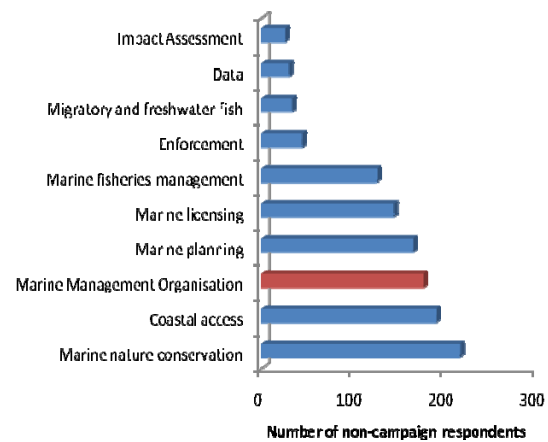
Ensuring accountability was another motivating factor in the clarification sought by respondents in relation to roles and responsibilities. Respondents requested that where roles had not been tasked to a single body (as in the case of management of MCZs) that this be swiftly arranged so that it was clear where responsibility, and thus accountability, lay.

Key Conclusions by policy area

Marine Management Organisation

The Marine Management Organisation (MMO) was addressed by 177 respondents. The majority of respondents supported the creation of the MMO and its planned role as a 'one-stop shop' for marine planning and licensing.

Many qualified their support by stating a number of concerns that they felt could prevent the MMO from fulfilling this role. These concerns addressed the following issues.



Resources

Respondents emphasised that the resources (both financial and human) allocated to the MMO must be adequate to fulfil the wide range of responsibilities the body is to be tasked with.

Sixteen respondents (9%) felt the creation of 40 new posts to staff the MMO would be inadequate for the proposed functions of the body. The reliance on existing personnel from the Marine and Fisheries Agency (MFA) was also questioned. The majority of these respondents were drawn from the local government and other non-governmental organisations (NGOs) sectors.

Respondents addressed not only the number but also the quality of personnel allocated, urging that staff should have experience and knowledge of a wide range of fields.

Scientific research and data was another area commented upon by respondents as one in which the MMO must be adequately resourced. More detailed comments on this topic can be found in the data section (pp 33).

Responsibilities

Respondents sought further clarification on the responsibilities and functions that would be tasked to the MMO.

There was concern regarding the split of responsibilities between the Infrastructure Planning Commission (IPC) and the MMO, particularly among respondents from the environmental and individual sectors. Thirty respondents (17%), supported by the 2,202 RSPB campaign respondents, called for the MMO to deal with all marine projects, irrespective of size. The RSPB campaign (2,202 responses) explained: "As the MMO will be an expert planning and licensing body for the marine environment, it is logical for it to license marine projects irrespective of size."

Conversely, six respondents (3%) proposed that the remit of the IPC should be extended (for example to cover all marine projects over 50 Megawatts), or that the IPC deal with all marine projects from 1 Megawatt (MW) upwards. Predominant among these respondents was the energy supply industry. This reflected the wider call from respondents in this sector for consistency in the approach to marine licensing, particularly in relation to offshore planning applications.

Relationships with other bodies

Respondents emphasised that the MMO should foster strong relationships with other bodies in the same field.

Twenty-five respondents (14%) proposed that their sector be represented on the MMO Board. These comments came from a wide range of sectors, but particularly well-represented were ports and shipping, as well as the energy supply industry, environmental groups and other NGOs.

Respondents also questioned the relationship between the MMO and other public bodies. Sixty-nine respondents (39%) sought clarification on the relationships between the MMO and the IPC, as well as with those bodies listed in paragraphs 3.10-3.13 of the Policy Paper^E.

Predominant among those respondents were bodies that may be involved in such relationships with the MMO: local government, public bodies and other NGOs. The 'other NGOs' mainly comprised coastal and estuarine partnerships and forums.

Respondents sought clarification on the duties that would be performed by the MMO and these external bodies respectively, particularly in areas of overlapping interest or jurisdiction. It was proposed that these duties be explicitly outlined, and seven respondents (4%) called for the MMO and external bodies (particularly the IPC) to be required to consult one another in carrying out their respective functions. Predominant among these seven respondents were the public bodies.

Other issues

In addition to the key issues identified above, respondents addressed the following themes:

- *Sustainable development* - 28 respondents (16%) commented upon the MMO's commitment to 'contribute to the achievement of sustainable development.'

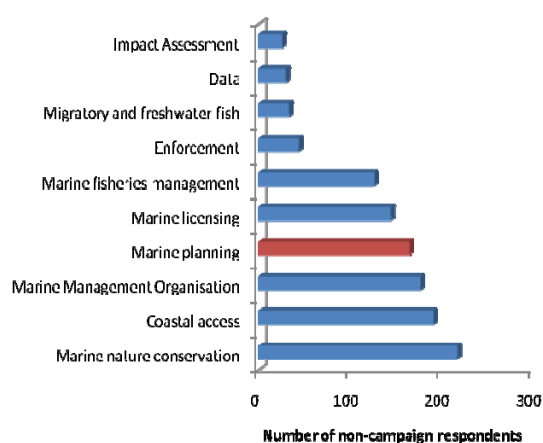
^E Bodies listed in paragraphs 3.10-3.13 of the Policy Paper include: the Marine and Fisheries Agency (MFA), Inshore Fisheries and Conservation Authorities (IFCAs), Natural England, the Joint Nature Conservation Committee, the Environment Agency, the Maritime and Coastguard Agency and 'other bodies with similar interests,' as well as local authorities and coastal stakeholders. Also listed are Government Departments such as: Department for the Environment, Food and Rural Affairs (Defra), the Department for Transport (DfT), Department for Business, Enterprise and Regulatory Reform (BERR), Department for Communities and Local Government (CLG), Ministry of Defence (MoD) and Department for Culture, Media and Sport (DCMS).

Well-represented among these respondents were environmental groups, other non-governmental organisations and public bodies. Further clarification on this commitment was sought by nine respondents (5%), who asked that 'sustainable development' be defined with clear objectives or that a certain aspect (such as marine historical conservation) be included. Fourteen respondents (8%) felt that the commitment should be strengthened and the MMO take on a more proactive role in this area. It was suggested that the wording be changed to reflect this, giving the MMO a commitment to 'furthering' sustainable development. Well-represented among these fourteen respondents were environmental organisation and public bodies.

- *Accountability* - 23 respondents (13%) emphasised that the functioning of the MMO should be transparent and accountable. Further clarification was sought on how accountability would be ensured both at national and local level. The local government, environmental and public bodies sectors were well-represented among respondents addressing this issue.
- *Location* – 11 respondents (6%) proposed a location for the MMO headquarters. Well-represented were other NGOs; primarily coastal and estuarine forums.

Marine Planning

Marine Planning attracted comments from 165 respondents. Responses were largely positive, praising the aim of introducing a marine planning process, but also identified areas of concern within the legislation.



Marine Policy Statement

Thirty-three respondents (20%) addressed the proposed content of the Marine Policy Statement (MPS). Responses were wide-ranging but mainly focused on the need for the MPS to be concise, robust, and deliver clear objectives both for marine planning and for balancing diverse marine interests. Twelve respondents (7%) called for the commitment to sustainable development in the MPS to be made stronger and more detailed. Well-represented among these twelve respondents were the environmental and other non-governmental organisations (NGOs) sectors.

Respondents also urged that the MPS be co-ordinated with legislation in other fields (such as climate change), as well as with the National Policy Statements (NPSs) prepared as a result of the Planning Bill, to avoid conflict between marine and terrestrial planning. Eighteen respondents (11%) requested further details on the relationship between marine planning and NPSs, as well as with the new Infrastructure Planning Commission (IPC). The largest sector groups among these respondents were other NGOs and the energy supply industry.

Duties

Concern was expressed by 20 respondents (12%), primarily public bodies and environmental groups, that planning bodies were not under any obligation to plan and urged that a duty be put on these bodies accordingly. Eighteen of those respondents (11%) proposed that a clear timescale be included in this duty. The RSPB campaign (2,202 responses) echoed this call, asking that there be a requirement for plans to be drawn up within a defined timetable.

Relationships

Clarification was sought by 36 respondents (22%) on the relationship between marine and terrestrial planning legislation and mechanisms, which they felt had not been addressed in adequate detail in the draft Bill. Respondents were drawn from a wide range of sectors, with public bodies, local governments and other NGOs well-represented.

Of particular concern were coastal areas, where the overlap between marine and terrestrial authorities would be greatest and where human activity (such as development and recreation) is concentrated. Further details were requested by 41 respondents (25%) on how marine planning would proceed at the coast, and how it would be integrated with other planning processes in these areas.

In particular respondents proposed that marine plan authorities should have regard to the Water Framework Directive (WFD) and River Basin Management Plans.

A number of respondents emphasised that Integrated Coastal Zone Management (ICZM) should be an approach that is integral to planning at the coast. It was suggested that local authorities and coastal partnerships, as experienced coastal managers, be consulted on delivering ICZM.

Public Participation

Respondents also addressed the relationship between planning bodies and relevant stakeholders. Sixty-three respondents (38%) highlighted the importance of adequate stakeholder involvement to the success of marine planning. Predominant among these respondents were other NGOs; primarily coastal and estuarine forums and partnerships. Also well-represented were local authorities and public bodies.

The provisions for advisory and consultative groups were welcomed, but respondents sought further clarification on the structure (particularly in terms of sector representation) and responsibilities of such groups.

Other Issues

In addition to the key issues identified above, respondents addressed the following themes:

- *Accountability* - 20 respondents (12%) commented on the provisions for the scrutiny and accountability of Marine Plans. Well-represented among these respondents were other NGOs and public bodies. Respondents sought clarification of the format that public scrutiny of plans would take. It was proposed that a similar procedure to that applied to terrestrial plans should be adopted, including clear consultation and a public examination.
- *Transitional arrangements* - 13 respondents (8%), particularly those from the energy supply industry, sought further details on the provisions for the transitional period before Marine Plans could be established. Respondents urged that these provisions be made clear, either in the Bill or in secondary legislation, so that there would be no confusion to hinder development during the transitional period. It was urged that these arrangements be widely communicated to stakeholders.
- *Review of plans* - Nine respondents (5%), predominantly from public bodies and other NGOs, emphasised the importance of regularly reviewing plans. It was urged that reviews take into consideration factors such as climate change and new scientific data.

Marine Licensing

There were comments from 145 respondents on Marine Licensing. The majority of respondents were in favour of the proposals to streamline licensing bodies and procedures. However, they also raised concerns relating to the following issues.

Remit

Respondents addressed the remit of licensing bodies in two main areas: dredging and oil and gas regulation.

There was support from 13 respondents (9%) for inclusion of all forms of dredging within the licensing regime as this would bring consistency to the regulation of dredging. Well-represented among these respondents were public bodies and environmental groups.

Conversely, eight respondents (5%), particularly those from ports and shipping groups, requested an exemption from licensing for maintenance dredging.

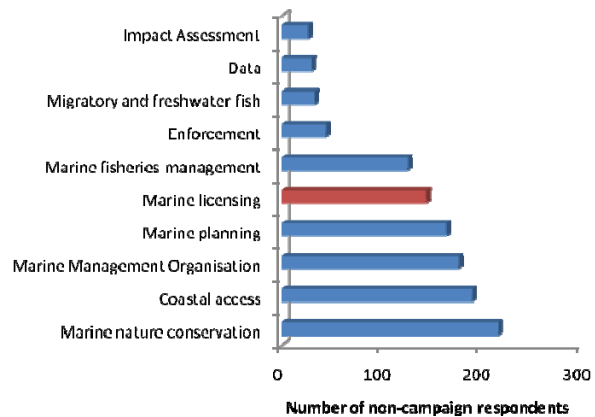
Twelve respondents (8%) questioned the exclusion of oil and gas licensing from the licensing section of the Bill and asked that this be brought into scope. These respondents were drawn from a wide range of sectors, with local authorities and the energy supply industry well-represented. Conversely, one respondent from the energy supply industry supported this exclusion but sought further clarification on the relationship between oil and gas licensing and the marine management processes established by the Bill.

Relationships

Respondents commented upon the relationships between marine licensing authorities, as well as with stakeholders and terrestrial licensing bodies.

Seventeen respondents (12%) proposed that there be statutory consultees to the licensing process. Statutory Nature Conservation Bodies (SNCBs) were the primary consultees proposed, but also suggested were: English Heritage, the Environment Agency, the Inshore Fisheries and Conservation Authorities (IFCAs) and Local Government. The largest sector among these respondents was environmental. Also well-represented were public bodies and other NGOs.

The importance of stakeholder engagement in marine licensing was emphasised by twenty-one respondents (14%). Respondents sought clarification on the process of stakeholder involvement, particularly at the local level. Five respondents (3%) supported the establishment of a mechanism for appeals against licensing decisions. These five respondents were drawn from the following sectors: the energy supply industry, other NGOs, environmental and recreational.



There were comments on the issue of licensing across the sea-land interface from twenty-five respondents (17%). Twelve respondents (8%), predominately public bodies, called for clear and robust working relationships between marine and terrestrial licensing authorities, particularly in coastal areas.

This comment should be considered in conjunction with the Marine Management Organisation section (pp 12-14), where respondents addressed the relationship between the MMO and the Infrastructure Planning Committee (IPC).

Other Issues

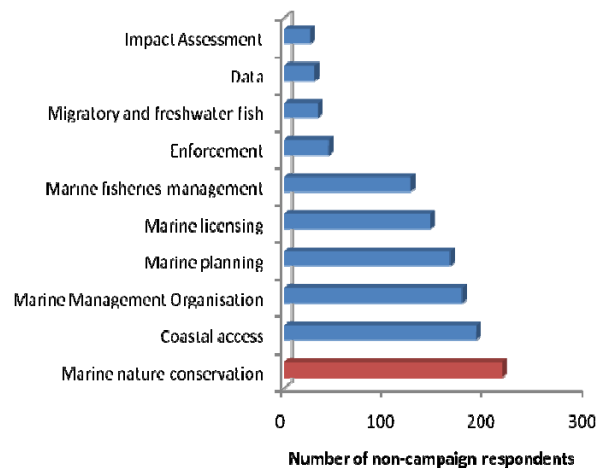
In addition to the key issues identified above, respondents addressed the following themes:

- *Exemptions* - 19 respondents (13%) commented on activities that may be exempted from licensing. Eight respondents (5%) sought clarification on whether a particular activity would require a licence, or whether it could be exempt from this requirement. These respondents were drawn from a wide range of sectors, including: public bodies, academic/research, other NGOs, ports and shipping and recreational. Six respondents (4%), as well as the RSPB campaign (2,202 respondents), proposed that the licensing body should be informed when exempted activities were carried out, and that these activities should be listed in the proposed register of licensed activities. Predominant amongst the six non-campaign respondents was the environmental sector.
- *Transitional arrangements* - 12 respondents (8%) sought clarification on the details and timescale of interim arrangements that would operate before the new marine licensing procedures were established. Well-represented among these respondents was the energy supply industry. Respondents urged that these details be published, either in the Bill or in secondary legislation, to avoid uncertainty amongst stakeholders and delays in development during the transitional period.
- *Environmental safeguards* - 11 respondents (7%), primarily from environmental groups, expressed the belief that the environmental safeguards in marine licensing should be strengthened. The 2,202 respondents who commented via the RSPB campaign said: "I am disappointed that the draft Marine Bill is not proposing stronger environmental safeguards within the criteria for granting licences for activities at sea, in some cases the proposed text weakens current safeguards."

Marine Nature Conservation

Marine nature conservation attracted comments from 217 respondents. These responses were primarily concerned with the Marine Conservation Zones (MCZs), so analysis has focused on this area.

The majority of respondents were broadly in favour of the creation of MCZs, but this support was conditional upon the following concerns being addressed.



Duty to designate

Respondents were concerned that there was no statutory requirement for designation. Sixty-one respondents (28%) proposed that there be a duty upon the relevant authority to designate MCZs, while 34 respondents (16%) called for a more concrete timescale to be included, co-ordinated with the development of the marine plans as well as the UK's wider environmental targets. Well-represented among both sets of respondents were environmental groups and public bodies.

The importance of a network of sites being established, in order to provide for species movement and thus better preserve biodiversity, was stressed by 48 respondents (22%). The RSPB (2,197 responses) and the IFAW campaigns (1,257 responses) echoed this call, and urged that designation be solely on the basis of scientific criteria. The Friends of the Earth campaign (41 responses^F) called for a duty on the Secretary of State to establish a network of Highly Protected Marine Reserves, covering at least 30% of UK seas out to 200 nautical miles (nm).

Designation criteria

Over half of respondents on this policy area -118 respondents (54%) -addressed the criteria that would be used to designate MCZs. Many sought further clarification on these criteria and asked that they be made explicit in the Bill. Others commented on what those criteria should be. Respondents were unified in urging that stakeholders be fully consulted during designation.

Forty-eight respondents (22%) emphasised that sites should be identified by robust scientific criteria, as in the case of terrestrial Sites of Special Scientific Interest (SSSIs). Twenty-two respondents (10%) urged that socio-economic factors be considered secondarily to scientific evidence. Well-represented among both sets of respondents were environmental groups and individuals.

^F This campaign ('No Place to Hide') took the form of postcards sent to local MPs. 41 submissions were received from MPs. Of these, 7 noted that multiple postcards had been received, but did not include the total number of postcards received.

Conversely, 20 respondents (9%) called for a stronger commitment to consider socio-economic factors in designation. It was suggested that the language of the Bill be modified to reflect this; so that where it is stated that the appropriate authority “may have regard to” economic or social consequences of designation, ‘may’ should be changed to ‘must.’ The largest group among these respondents was the energy supply industry.

Four respondents (2%), predominantly from public bodies and heritage groups, proposed that sites of marine archaeological and historical significance be considered for designation.

Management

Clarification was sought on the everyday management of MCZs by 50 respondents (23%). Concern was raised that no one body was given responsibility for everyday management in the draft Bill. It was proposed that this body should have a duty to monitor and report regularly on the condition of the sites, so that management could be adapted to changing circumstances. It was suggested that reporting should be tied to the conservation aims of sites so that the performance of each site could be gauged. Respondents urged that adequate resources be made available for maintenance and monitoring.

Other issues

In addition to the key issues identified above, respondents addressed the following themes:

- *Permitted activities* - 42 respondents (19%) sought further clarification of the activities that would be permitted within MCZs. The majority of respondents opposed uniform restrictions upon certain activities across all sites, and supported a case-by-case approach with the level of restriction proportional to the impact of each activity upon a site. Well-represented among these respondents were environmental bodies, the energy supply industry, individuals and recreational groups. Conversely, the Friends of the Earth Campaign (41 respondents) called for a ban on all human activities, including fishing, within protected reserves.
- *Duty of public authorities* - 30 respondents (14%) requested clarification on the general duty of public authorities towards the MCZs. Such comments came predominantly from public bodies, environmental groups and other NGOs. It was felt that the wording of the draft Bill in relation to this duty was unclear, particularly on the procedure for authorising activities that may affect an MCZ. Some respondents called for public authorities to have a more positive commitment to further the aims of the MCZs, in line with the duty placed upon IFCAs in relation to these sites. In particular it was felt by 13 respondents (6%), primarily from environmental groups and public bodies, that the requirement on public authorities to notify or consult the Statutory Nature Conservation Bodies (SNCBs) in relation to activities that could potentially damage MCZs should be strengthened.

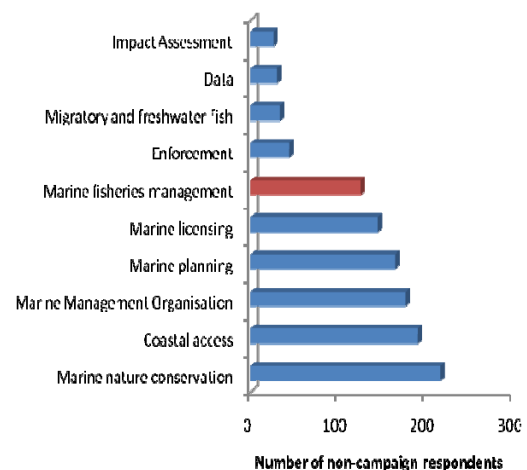
- *Sanctions* - Eight respondents (4%), predominantly from environmental groups, called for the establishment of a general offence for damaging, destroying or disturbing the features for which a MCZ was designated. It was felt that this offence would serve as a useful deterrent and, where necessary, target damage that could not be dealt with by conservation orders.

The International Fund for Animal Welfare campaign (1,257 responses) raised the concern that underwater noise had not been recognised in the draft Bill as a pollutant and a threat to marine life. IFAW urged that ocean noise be regulated in order to mitigate its harmful effect on marine animals.

Marine Fisheries Management

The Marine Fisheries proposals in the draft Bill were referred to by 126 respondents, with 96 respondents commenting on proposals to reform inshore fisheries management through the creation of Inshore Fisheries and Conservation Authorities (IFCAs). Given this focus among responses, analysis has concentrated on IFCAs^G.

The majority of respondents supported the replacement of Sea Fisheries Committees (SFCs) with IFCAs and welcomed their new purpose to manage the exploitation of sea fisheries resources in a sustainable way, with greater consideration of the wider impacts of fishing activity on the marine environment. However, for many respondents this support was conditional upon the following concerns being addressed.



Guiding principles

The majority of respondents welcomed the creation of IFCAs and supported their increased responsibility to protect and conserve the marine environment. Twenty-six respondents (27%) felt that this commitment should be strengthened; particularly the environmental sector where respondents called for the newly created IFCAs to take on a “comprehensive marine stewardship role.” The RSPB campaign (2,197 responses) echoed this proposal, calling for a shift in their core focus. Respondents felt that in order for IFCAs to be effective managers of the marine environment, it is essential for this culture change to take place.

Structure

Clarification on the structure of IFCAs was sought by 26 respondents (27%), particularly on the number and geographic location of these bodies. The central concern was that without an adequate number of IFCAs both efficacy and accountability at the local level would be compromised. This concern was voiced primarily by local authorities.

Respondents across a range of sectors expressed concern about what the composition of IFCAs would look like in terms of personnel and expertise. They urged a wide representation of membership with experience in a range of matters concerning the marine environment. Eight respondents (8%) proposed that their particular sector be represented on the newly created IFCAs. Well-represented among these respondents were recreational groups.

^G For this reason, all percentages that follow are related to the 96 respondents who addressed IFCAs, rather than the 126 who commented on Marine Fisheries Management.

Responsibilities

Respondents were generally supportive of the range of new functions proposed for IFCA's. However, there was a widespread call for greater clarification of these functions, particularly on issues of jurisdiction, including duties and geographic responsibility.

Five respondents (5%), predominantly from environmental and fishing groups, proposed that there be a stronger commitment by government to extend IFCA's remit out to 12 nautical miles (nm) from the shore.

Further clarification on the relationship between IFCA's and other organisations was sought by 21 respondents (22%), particularly where there are overlapping duties. Of primary concern was the division of duties between IFCA's, the MMO and the Environment Agency. Regional Planning Authorities and coastal partnerships were also considered. Well-represented among these respondents were public bodies as well as fishing and other non-governmental organisations.

More specifically, respondents asked for greater detail on the relationship between IFCA's and the Environment Agency, particularly in areas of overlapping jurisdiction such as estuaries. It was also proposed that IFCA's co-operate with the Environment Agency to further the aims of the Water Framework Directive.

Respondents from the fishing, environmental and recreational sectors also stressed that co-ordination between individual IFCA's is essential, with 3 respondents (3%) proposing that the MMO should have an over-arching role to ensure IFCA's co-operate on cross-border issues.

Other Issues

In addition to the key issues identified above, respondents addressed the following themes:

- *Funding* - 14 respondents (14%), primarily from local government and other NGOs, commented on funding for IFCA's. While respondents welcomed the new funding commitment made by central government for funding at a local level, they stressed the importance of ensuring that IFCA's are properly funded so that they can effectively fulfil their new purpose and duties. Respondents further sought reassurance that the funding allocation would be regularly reviewed and adjusted if necessary.
- *Accountability* - Eight respondents (8%) addressed the accountability of IFCA's and proposed regular scrutiny of their performance so that poor performance could be dealt with appropriately. Of primary concern was ensuring mechanisms are put in place to promote IFCA accountability and performance. Well-represented among these respondents was the environmental and recreational sectors.

- *Byelaws* - There was broad support for proposals to improve and update the current byelaw-making process and respondents welcomed the ability of IFCA's to introduce byelaws to further the conservation objectives of MCZs and to introduce emergency byelaws at short notice. Six respondents (6%), primarily from the environmental and fishing sectors, sought clarification on permits and wondered whether IFCA's would have sufficient powers to limit the number of permits issued.

Migratory and Freshwater Fish

Migratory and freshwater fish measures were commented on by 33 respondents. A number of respondents addressed peripheral concerns (for example relating to the Environment Agency's powers to introduce byelaws in order to protect features of Marine Conservation Zones in Welsh waters).

Among those who specifically addressed the proposals for migratory and freshwater fish, there was majority support for the inclusion of this area within the Bill as well as for the content of proposals.

One respondent qualified their support by stating that separate legislation for this area would have been preferable. This was supported by another respondent, who opposed the inclusion of migratory and freshwater fish legislation in the marine Bill for this reason. The former respondent was from the environmental sector, the latter from the fishing sector.

Responses mainly addressed the live fish movement scheme and particularly the enforcement of this scheme.

Live fish movement scheme

Eight respondents (24%) explicitly welcomed the inclusion of the live fish movement scheme in the marine Bill. Public bodies were well-represented on this position.

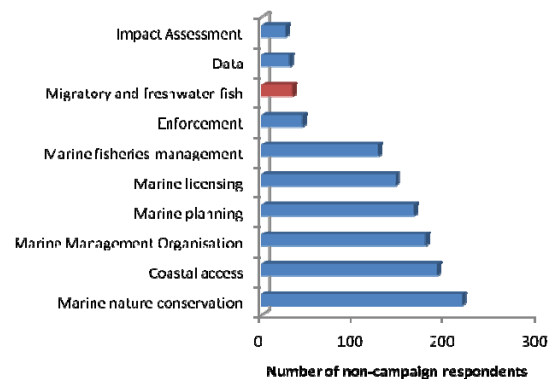
This inclusion was opposed by one respondent (3%) from the fishing sector, who stated that the current legislation was sufficient and should continue to be enforced by the Centre for Environment, Fisheries and Aquaculture Science (CEFAS).

Four respondents (12%), predominantly from fishing groups, commented on the provisions for the enforcement of the scheme. Respondents sought clarification on these provisions and asked that further details be included in legislation.

Other issues

In addition to the key issues identified above, respondents addressed the following themes:

- *Relationship with marine fisheries regulations* - Seven respondents (21%) stressed the need for migratory and freshwater fish and marine fisheries measures to be consistent. To this end, respondents urged regulatory bodies (particularly the Environment Agency and the Inshore Fisheries and Conservation Authorities) to establish strong working relationships. Well-represented among these respondents were public bodies.

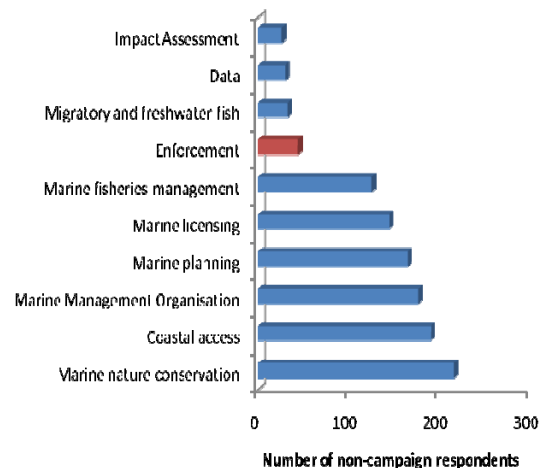


- *Environment Agency Responsibility* - Four respondents (12%) proposed amendments to the Environment Agency's statutory duties concerning migratory and freshwater fish. These respondents emphasised that this duty should include maintaining biodiversity and furthering the socio-economic value of fishing, in line with the recommendations of the Salmon & Freshwater Fisheries Review. Recreational groups were well-represented on this position.
- *Compensation* - Six respondents (18%) called for the repeal of current legislation which provides for compensation to be paid to fishery owners when their interests have been adversely affected by the introduction of a byelaw. It was argued that this obligation to pay compensation has, at times, discouraged the Environment Agency from proposing byelaws needed to conserve fish stocks. These respondents were equally spread across the public bodies, individual, fishing and recreational sectors.

Enforcement

Enforcement issues were addressed by 44 respondents. In many cases these comments should be read in conjunction with remarks on the enforcement of specific sections of the Bill, such as licensing (pp 17-18), marine nature conservation (pp19-21) and MMO operations (pp 12-14).

There was general support for enforcement provisions, though concerns were raised on the following issues.



Relationships

Eighteen respondents (41%) commented on the relationships between organisations with enforcement responsibilities in the marine area. Well-represented among these respondents were other NGOs, environmental groups and public bodies.

A number of respondents emphasised that there was a need for greater clarity on how enforcement authorities in the same area would work together. More detail was sought on responsibilities and powers, and whether Marine Enforcement Officers (MEOs) should be cross-warranted. Responses referred to the Marine Management Organisation (MMO), the Environment Agency and Inshore Fisheries and Conservation Authorities (IFCAs) primarily, but also extended to other bodies such as the Maritime and Coastguard Agency (MCA).

Local accountability and byelaws were also addressed, as well as the role of voluntary wardens, local authorities and coastal partnerships. Some respondents suggested that the contribution other bodies could make to the efforts of enforcement officers was important and should be formally recognised.

Resources

The importance of adequate resources to the efficacy of enforcement measures was emphasised by 19 respondents (43%). This was highlighted as an issue as enforcement in a marine environment was felt to be more complicated and costly than on land. Respondents on this point were from a wide range of sectors, with public bodies particularly well-represented.

It was generally agreed by respondents that without adequate resourcing, both for the MMO and more widely, it would not be possible to monitor, enforce or prosecute effectively. Concerns were also raised about the cost of prosecution, and liability cover for enforcement officers to recompense ship owners for mistaken or erroneous detention.

Penalties and civil sanctions

Sixteen respondents (38%) welcomed civil sanctions as flexible and proportionate way of addressing offences.

However, some had reservations in relation to fisheries and Marine Conservation Zones (MCZs), and with regard to the standard of evidence required. These comments came from a range of sectors, with environmental groups and other NGOs well-represented.

A couple of responses were concerned that civil sanctions may not be a sufficient deterrent, for example if the size of fines imposed was too low, which could undermine the intent of the Bill. It was also suggested that the threat of prosecution would help to send a clear message about the environmental importance of marine conservation.

There was concern that the application of the law should not endanger life at sea when considering strict liability offences. Some respondents felt that offences should be authorised by Parliament and that any judgement or punishment must be handled via the courts. In a similar vein, some respondents felt that navigation rights and the right of innocent passage in UK waters should be protected.

A detailed point was made on the method of measurement of underwater sound and use in evidence by enforcement officers.

Enforcement officers

Respondents also sought clarification on the accountability, legal powers and responsibilities of enforcement officers. There were requests for clarity on entry to premises used for more than one purpose, jurisdiction boundaries and enforcement responsibilities between the 6 and 12 nm limits. There were also questions relating to international maritime law, including the behaviour of international shipping passing UK shores.

Seven respondents (16%) commented that the appointment, training and regulation of enforcement officers need to be clearly set out in legislation. Well-represented among these respondents were public bodies and other NGOs. There were also comments on inter-agency working and resourcing, particularly with regard to accountability surrounding the appointment and operations of enforcement officers.

Specific concerns were raised in relation to the power an enforcement officer has to detain a vessel to the nearest convenient port, and about the role of police officers in nature conservation enforcement.

Other issues

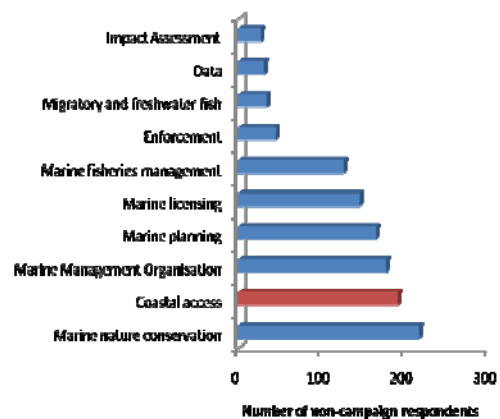
In addition to the issues identified above, respondents addressed a number of other concerns. Issues varied greatly, with only the following one attracting more than one response.

- *Remediation and stop notices* - Two respondents (4%) suggested that the provision for remediation and stop notices for licensing enforcement should not be limited to “serious” harm to human health, which could be difficult to establish.

Coastal Access

The topic of coastal access was addressed by 191 respondents.

Support was expressed by 96 respondents (50%) for the proposals to increase access to the coast, who welcomed the consideration of local opinion and nature conservation in provisions for planning the coastal route. Respondents also identified some areas of concern or where further clarification was sought. These respondents were drawn from a wide range of sectors, but particularly well-represented were local authorities, environmental groups, public bodies and recreation groups.



In addition over 11,000 postcards were received through the Ramblers' Association campaign, supporting the proposals in the draft Bill for coastal access.

Forty-four respondents (23%) did not welcome the legislation (to varying degrees); highlighting possible disruption to agriculture and other businesses, and impacts on wildlife and private landowners. Respondents proposed that the focus of action be upon improving existing access rather than creating new access routes, or that voluntary action rather than legislation should be used to increase access. Individuals, many of them coastal landowners, represented the largest group among those who did not welcome proposals.

The remaining respondents did not express clear support or opposition to the legislation. Following are the issues raised by respondents.

Funding

Respondents identified concerns about funding for implementation and long-term maintenance of the new access measures.

Natural England's estimated expenditure of £50m over 10 years was a concern for 21 respondents (11%) who suggested that it would not prove adequate to deliver the improvements required.

Fifty respondents (26%) sought clarification on the funding and responsibility for long-term maintenance of the coastal route. Respondents noted that there were currently no such details in the draft Bill, and urged that these be included. Predominant among these respondents were local authorities, public bodies and other non-governmental organisations (NGOs).

Respondents also highlighted the need to provide funding for roll-back of access where coastal erosion would have a significant impact.

Higher rights

The issue of which users would be allowed access to the coastal path, and under what circumstances, was addressed by 35 respondents (18%). Views were mixed on the inclusion of rights for users such as horse riders or cyclists.

Nine respondents (5%) supported the focus in the draft legislation on access for pedestrian users, highlighting the increased costs and environmental damage that may ensue from extending access to other users.

The inclusion of rights for other non-motorised users (including cyclists and horse riders) where local circumstances allowed was supported by 27 respondents (14%). They emphasised that this represented the best value use of access land. Some respondents also highlighted the need to provide access for those with restricted mobility.

Parks and gardens

Respondents also commented on the categories of land to be excepted from coastal access.

Fifteen respondents (8%) supported the draft Bill's provisions for parks and gardens to be excepted land, as they are under the Countryside and Rights of Way Act (CROW) Act of 2000. Respondents focused primarily on gardens, emphasising that excepting this land was important in maintaining the privacy of private landowners. Well-represented among these respondents were individuals and other NGOs, predominantly private estates.

There was opposition to the uniform designation of parks and gardens as excepted land from five respondents (3%). They argued that this would compromise the vision of a continuous coastal route and that it may be reasonable to provide a route through in some exceptional circumstances. The largest group among these respondents was the recreational sector.

Appeals

The provision of a mechanism of appeals to an independent body was called for by 19 respondents (10%). This would allow coastal owners and occupiers to appeal on the location of the route and spreading room, against decisions by Natural England not to allow restrictions on access, or in relation to impacts on business or property. Well-represented among these respondents were public bodies and other NGOs (primarily private estates).

Two respondents (1%) from recreational groups did not see any need for an independent appeals mechanism, commenting that appeals could prove both time-consuming and expensive. These respondents reasoned that thorough local consultation prior to implementation would resolve conflict and thus negate the need for appeals.

Compensation

Forty-four respondents (23%) proposed that procedures be established for compensating coastal property owners or businesses, where a significant loss could be proven. Respondents expressed concern that increased coastal access could result in loss in terms of disruption to agriculture or other businesses or reduced property values.

Conversely, three respondents (2%) opposed the provision of compensation, emphasising that local consultation during the implementation of increased access would avoid such losses. One respondent noted that coastal businesses could benefit from an upswing in tourism as a result of increased coastal access.

Other issues

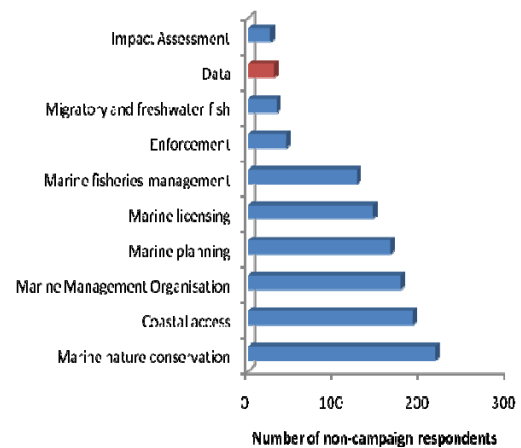
- *Nature conservation* - 31 respondents (16%) commented on the need to protect vulnerable habitats and species from the impact of increased coastal access. Respondents supported the proposal that some sites be closed to access during sensitive seasons (for example during bird nesting seasons). Some respondents called for vulnerable areas such as Natura 2000 sites to be excluded altogether. It was also suggested that archaeological and historical sites be given similar consideration. Well-represented among these respondents were environmental and heritage groups, other NGOs and local authorities. Ten respondents (5%) proposed that details of how environmental improvements will be achieved should be included, either directly in the Bill or through Natural England's Scheme.
- *Spreading room* - 20 respondents (10%) sought further clarification on the designation of land for 'spreading room,' and the activities which might be permitted within these areas. Predominant among these respondents were public bodies and other NGOs (private estates)
- *Dog control* - 20 respondents (10%) expressed concern about reduction in dog control provisions from the level of restrictions in the CROW Act (2000). Respondents called for a more exact definition of the requirement to keep dogs under 'close control,' which was felt to be open to wide interpretation and thus difficult to enforce. Respondents felt that this requirement should be strengthened and owners required to keep their dogs on the lead in the presence of livestock and to protect wildlife such as ground nesting birds. Conversely, one response (on behalf of seven NGOs), supported the dog control provisions in the draft Bill, calling for controls varying by local circumstance rather than general restrictions.
- *Estuaries* - 20 respondents (10%) sought greater clarification on the treatment of estuaries within the coastal access legislation. Respondents welcomed provisions for access to be restricted where necessary for wildlife protection, but requested further details on the approach to the management of access in estuaries. Respondents emphasised that estuaries represented fragile habitats and thus raised concerns about the potential effects of increased access in these areas. Well-represented among these respondents were other NGOs, as well as local authorities and environmental groups.

- *Future Development* - 17 respondents (9%) addressed the issue of future development on the coast. They welcomed the exception from the right of access of developed land and land covered by works for the purposes of a statutory undertaking, and the recognition that it will usually be necessary to avoid ports and other industrial areas. However, they urged that this should be extended to cover land held for future development, and stressed that coastal access should not hinder the projected future growth in ports and port traffic. The majority of these responses came from the ports and shipping sector. Also represented was the energy supply industry.

Data

Thirty respondents commented on the provisions in the draft Bill for data capture and use. Respondents were supportive of the emphasis placed in the Bill on the importance of adequate data collection and management, but raised concerns regarding some of the mechanisms by which this would be achieved.

Concerns centred on the Marine Management Organisation (MMO) as well as wider funding for research and data management.



Addressing the existing marine data situation, 10 respondents (33%) identified a need for more marine data and for greater co-ordination in its acquisition. Well-represented among these respondents were other NGOs.

Marine Management Organisation

Respondents commented upon the MMO's role both as a user and a provider of scientific data, and the importance of maintaining strong links with the wider research community to fulfil this role. These comments should be read in conjunction with the Marine Management Organisation section (pp 12-14), where concerns relating to the resourcing of the MMO are also addressed.

Six respondents (20%) emphasised that the MMO would need to be able to call upon a robust base of scientific evidence, as well as undertake a programme of data acquisition, in order to carry out its duties. The largest sector among these respondents was other NGOs; predominantly coastal and estuary partnerships.

Further, eight respondents (27%) proposed that the MMO should act as a central point for the collection and release of data. To this end, two of those respondents (7%) urged that legislation be amended to give the MMO a more proactive role in data management, with one suggesting that the MMO have a statutory duty to develop a marine database and facilitate access to it. Both of these respondents were drawn from the energy supply industry.

The importance of the MMO working with external bodies involved in data capture and management was highlighted by seven respondents (23%), primarily other NGOs. Four of those respondents (13%) offered the services of their group or sector. The largest sector among these four respondents was other NGOs, but recreational groups and public bodies were also represented.

Funding

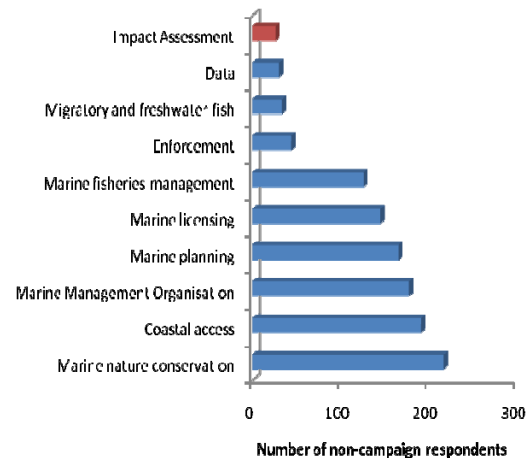
Ten respondents (33%) felt that it was not clear that the funding needed to support the required data acquisition has been properly identified or would be made available.

Reference was made to the lack of detail on this issue in the Impact Assessment, particularly in relation to the budget for the MMO to commission and access research. Well-represented among these respondents were the academic/research and other NGOs sectors. The 'other NGOs' were primarily professional bodies representing groups involved in research.

Impact Assessment

There were comments from 26 respondents on the Impact Assessment. However, the vast majority focused on issues relating to specific policy areas, rather than the methodology of the impact assessment. Among those that addressed methodology there were no common themes.

Respondents addressed the impact assessment in relation to the following policy areas.



Marine Management Organisation

Four respondents (15%) expressed the opinion that the funding needed for the Marine Management Organisation (MMO) to carry out its responsibilities had been underestimated. The largest sector amongst these respondents was public bodies.

Further concerns regarding the resourcing of the MMO are discussed in the MMO (pp 12-14) and Data (pp 33) sections.

Marine Nature Conservation

Three respondents (12%) did not consider the projected benefits from Marine Conservation Zones (MCZs) to be realistic, and called for impact assessments used to designate sites to employ more robust evaluation methodologies. These respondents were equally spread across ports and shipping groups, the energy supply industry and other NGOs.

Conversely, three respondents (12%), primarily from environmental groups, felt that the projected benefits from the nature conservation elements of the draft Bill had been underestimated.

Licensing Enforcement

Three respondents (12%) pointed out that the cost implications of 'stop' notices had not been identified within the Impact Assessment. 2 of these respondents (8%) added that the cost implications of remediation notices had also been excluded. These respondents represented the energy supply industry, ports and shipping groups and other NGOs.

Annex A

Glossary of terms

Acronym	Definition
CEFAS	Centre for Environment, Fisheries & Aquaculture Science
CROW Act	Countryside and Rights of Way Act (2000)
EH	English Heritage
IA	Impact Assessment
ICZM	Integrated Coastal Zone Management
IFAW	International Fund for Animal Welfare
IFCA	Inshore Fisheries and Conservation Authority
IPC	Infrastructure Planning Commission
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone
MEO	Marine Enforcement Officer
MFA	Marine and Fisheries Agency
MMO	Marine Management Organisation
MPS	Marine Policy Statement
MW	Megawatts
NE	Natural England
NGO	Non-Governmental Organisation (see pp 6 for a full definition)
nm	Nautical miles
NPS	National Policy Statement
RSPB	Royal society for the Protection of birds
SFC	Sea Fisheries Committee
SNCB	Statutory Nature Conservation Body

SSSI	Site of Special Scientific Interest
WFD	Water Framework Directive

Annex B

List of Consultees

- A private individual
- Adams, G
- Appleby, T
- Associated British Ports
- Association for Geographic Information
- Association of Chief Police Officers
- Association of Electricity Producers
- Association of Local Government Archaeological Officers
- Atlantic Salmon Trust
- Bamford, D
- Barber, I
- Barclay, S
- Baynes, T
- Beaulieu Estate
- Behrens, P
- Beringer, G
- Biscay Dolphin Research Programme
- Brandes, S
- Brent , C
- Brett, L
- Brett Group
- Bridport Environment Group
- Bridport Local Area Partnership
- British Cave Research Association
- British Caving Association
- British Ecological Society
- British Energy
- British Horse Society
- British Marine Aggregate Producers Association
- British Marine Federation
- British Mountaineering Council
- British Ports Association
- British Spearfishing Association
- British Sub Aqua Club
- British Trout Association
- British Waterways
- Buckingham, T
- Bullimore, B
- BWEA and Scottish Renewables
- Byways and Bridleways Trust
- Cabot Divers
- Campaign for National Parks
- Cardiff Council

- Cardiff Harbour Authority
- CCPR
- Cefas Regulatory Assessment Team
- Centrica Energy
- Chadwick, M
- Chamber of Shipping
- Cheshire and Warrington Local Access Forum
- Chichester Harbour Conservancy
- Christchurch Borough Council
- ClientEarth & eppac
- Clinton-Jones, G B
- Clyde Fishermen's Association
- Coarse Fish Traders Association
- CoastWise North Devon
- Comhairle nan Eilean Siar
- Community and Regional Planning Services
- Confederation of British Industry
- Constance, C
- Cooks, A
- Cornwall Countryside Access Forum
- Cornwall County Council
- Cornwall Seal Group
- Council for British Archaeology
- Council for Nature Conservation and the Countryside (NI)
- Councillor B Quinn
- Councillor G Marsh
- Country Land and Business Association Ltd
- Countryside Access Forum for West Sussex
- Countryside Alliance
- Countryside Council for Wales
- Cox, S
- Cumbria Countryside Access Partnership Board
- Dawson Pell, F
- DBA - The Barge Association
- Dee Estuary Conservation Group
- Department of Agriculture & Rural Development (NI)
- Devon Conservation Forum
- Devon Countryside Access Forum
- Devon County Council
- Devon Maritime Forum
- Disability Action
- Dorset County Council
- Dorset Local Access Forum
- Drysdale, H
- Drysdale, M
- Durham Heritage Coast Partnership
- E.ON UK

- East Riding of Yorkshire and Kingston upon Hull JLAF
- EDF Energy
- Eldred, J
- English Heritage
- English National Park Authorities Association
- Environment Agency
- Environment Research Funders' Forum Secretariat
- Essex County Council
- Essex Local Access Forum
- Essex Wildlife Trust
- Europarc Atlantic Isles
- Evans, R
- Exbury Estate and Exbury Gardens
- Fallon, R
- Filey Against Dredging
- Fisher, M
- Flux, T
- Food Standards Agency
- Forbes, C
- Forth Ports PLC
- Freeman, T
- Friends of the Earth
- Gadsdon, G
- Gammage, H
- Galloway Static Gear Fisherman's Association
- Genge, R
- Glamorgan-Gwent Archaeological Trust
- Gloucester Harbour Trustees
- Gloucestershire County Council
- Hackman, J
- Hampshire & Isle of Wight Wildlife Trust
- Hampshire County Council
- Hampshire Economic Partnership's Marine Policy Group
- Hann, D R
- Harbour Committee of Torbay Council
- Harwood, T
- Heath, V
- Historic Houses Association
- Hobson, M
- Hoe Estate Company Limited
- van der Hoff, P
- Holden, M K
- Honeyman, H
- Hook, N
- Hooper, N
- Hull City Council
- Hutchison Ports (UK) Limited

- Institute of Ecology and Environmental Management
- Institute of Field Archaeologists
- Institute of Marine Engineering Science and Technology TAC
- Institution of Civil Engineers
- Inter-Agency Committee on Marine Science and Technology
- International Fund for Animal Welfare
- Jeanes, M
- Jessop, H
- Joint Advisory Committees of the North West Region
- Joint Local Access Forum for Bath & North East Somerset, Bristol City and South Gloucestershire
- Joint Nature Conservation Committee
- Jones, D W
- Jones, J
- Jones, P S
- Jordan, M
- Judge, A
- Kennel Club et al
- Kent & Essex Sea Fisheries Committee
- Kent Countryside Access Forum
- Kent County Council
- Kerrier District Council
- Kinghorn, P
- Kingston Seymour Parish Council
- Knipe, I
- Lake District National Park Authority
- Lane, G M
- Lascelles, G
- Latimer, R
- Lawfield, M
- Lawless, E
- Lewes District Council
- Lincolnshire County Council
- Little, J
- Living Coasts
- Llyn Fishermen's Association
- Local Government Association SIG
- London Aggregates Working Party
- Lord Teynham
- Luddington, T
- Lulworth Estate
- Maersk Line
- Manor of Cadland
- Marina Projects Limited
- Marine and Coastal Environment Research Group, Cardiff University
- Marine and Fisheries Agency
- Marine Biological Association of the United Kingdom

- Marine Conservation Society
- Marine Current Turbines Limited
- MARINET
- Maritime Plymouth
- Maritime UK
- Marsh, C
- Martin, A J
- Martin, B J D
- McLaren, P A
- Merseyside Environmental Advisory Service
- Met Office
- Miller, D
- Moran Committee
- Morris, K
- Moss, D
- National Caravan Council
- National Farmers' Union
- National Federation of Fishermen's Organisations
- National Federation of Sea Anglers
- National Grid
- National Marine Aquarium
- National Mullet Club
- National Oceanography Centre, Southampton
- Natural England
- Natural Environment Research Council
- Natural Living Assets
- Naylor, P
- Naylor, T
- Network Rail
- New Forest Access Forum
- New Forest National Park Authority
- Newry and Mourne District Council
- Newton, I
- Norman, F E
- Norman Court & Sowley Farms Ltd
- North Devon Area of Outstanding Natural Beauty
- North East Assembly
- North Norfolk District Council
- North Somerset Council
- North West Coastal Forum
- North West Regional Assembly
- North York Moors Local Access Forum
- North York Moors National Park Authority
- North Yorkshire and Cleveland Coastal Forum
- Northern Federation of Sea Angling Societies
- Northern Ireland Judicial Appointments Commission
- Northern Ireland Marine Task Force

- O'Donnell, S
- O'Leary, R
- Oil & Gas UK
- Ordnance Survey
- Orkney Fisheries Association
- PADI & Project AWARE Foundation (International)
- Parrish, E
- Passenger Shipping Association
- PCS Marine and Fisheries Agency National Branch
- Pearson, R
- Peel Ports Group
- Penwith District Council
- Penzance Town Council
- Phillipot, G
- Plymouth Local Access Forum
- Plymouth Marine Laboratory
- Plymouth Marine Sciences Partnership
- Polley, P J
- Poole Harbour Commissioners
- Port of London Authority
- Portland Harbour Authority Limited
- Poupard, C
- Purbeck Heritage Committee
- Ratcliff, J
- Reed, J
- Regional Development Agencies
- Regional Flood Defence Committee Chairmen
- Renewable Energy Association
- River Eden and District Fisheries Association
- Robertson, R
- Rout, H
- Rowe, J
- Royal Haskoning
- Royal Institution of Chartered Surveyors
- Royal National Lifeboat Institution
- Royal Society for the Protection of Birds
- Royal Town Planning Institute
- Royal Yachting Association
- RSPB Cymru
- Rushmer, P
- RWE npower and RWE Innogy
- Salmon & Trout Association
- Saunders, S
- Save our Seabirds Network
- Scolt Head and District Common Rightholders' Association
- Scottish and Southern Energy
- Scottish Association for Marine Science

- Scottish Coastal Forum
- Scottish Council for National Parks
- Scottish Environment LINK's Marine Task Force
- Scottish Fishermen's Federation
- Scottish Natural Heritage
- Scottish White Fish Producers Association Limited
- Scottish Wildlife Trust
- ScottishPower
- Sea Anglers' Conservation Network
- Seabed User & Development Group
- Seafish Industry Authority
- SeaZone
- Severn Estuary Partnership
- Seymour, C
- Shell UK Limited
- Shepway District Council
- Shetland Islands Council
- Showering, F
- Showering, W
- Sir Alister Hardy Foundation for Ocean Science
- Slatter, J
- Smith, M
- Smith, T
- Solent Forum
- Solent Protection Society
- Solent Waterfront Strategy Steering Group
- Solway Firth Partnership
- Somerset County Council
- South Coast Fishermen's Council
- South Devon & Channel Fishermen
- South Dorset Conservative Association
- South Downs Joint Committee
- South Downs Society
- South East England Regional Aggregates Working Party
- South West Maritime History Society
- South West Regional Aggregates Working Party
- South West Regional Assembly
- South West Regional Development Agency
- South West Rivers Association
- South West Tourism
- South Western Fish Producer Organisation Ltd.
- Southampton City Council
- Stancliffe, C
- Stanswood Bay Oystermen Limited
- Steane, E
- Stratton D
- Strickland, P

- Sub Sea Turbines Ltd.
- Suffolk Coastal District Council
- Suffolk County Council
- Sussex Seasearch
- Tamar Estuaries Consultative Forum
- Taussik, J
- Taw Torridge Estuary Forum
- Tees Valley Local Access Forum
- Templeman, M L
- Thames Estuary Partnership
- Thanet Coast Project
- The Air That We Breathe Group
- The Association of Sea Fisheries Committees of England and Wales
- The British Association for Shooting and Conservation
- The Crown Estate
- The Fishmongers' Company
- The Hayle Harbour Management Company
- The Highland Council
- The Marquis Group
- The Mersey Docks and Harbour Company
- The National Trust
- The National Trust for Scotland
- The Open Spaces Society
- The Planning Inspectorate
- The Ramblers' Association
- The Ramblers' Association (Gloucestershire Area)
- The RFDC, REPAC & RFERAC of Southern Region of the EA
- The Royal Society for the Prevention of Accidents
- The Royal Society of Edinburgh
- The Shellfish Association of Great Britain
- The Shellfish Network
- The West Cornwall Footpaths Conservation Society
- The Wildlife Trusts
- The Yacht Harbour Association
- Theobald, P
- Toms, A
- Torbay Local Access Forum
- Townson, H
- Trinity House
- Tyndall Centre for Climate Change Research
- Tyne and Wear Joint Local Access Forum
- UK Coastal Partnerships Working Group
- UK Environmental Law Association
- UK Major Ports Group
- UK Overseas Territories Conservation Forum
- Ulster Wildlife Trust
- United Kingdom Cable Protection Committee

- Vegetarian Economy & Green Agriculture
- Wales Coastal and Maritime Partnership
- Wales Environment Link
- Walthew, R
- Ward, L
- Warren, L M
- Water UK
- Watford Friends of the Earth
- Webb, B
- Welsh Association of National Park Authorities
- Welsh Federation of Sea Anglers
- Wembury Amenity Society
- Wessex Archaeology
- Wessex Constitutional Convention
- West Cornwall Lugger Industry Trust Ltd
- West Sussex County Council
- Whale and Dolphin Conservation Society
- Wildlife and Countryside Link
- Wildlife Trusts Wales
- Wilks, A
- Wilson, R J M
- Wirral Wildlife
- Witty, J
- Worham, P
- Wright, B
- Wright, J
- WWF-UK
- Yorkshire Forward