

[Does the Marine Spatial Plan achieve the correct balance between commercial activity, leisure activity, the Island's cultural heritage and the needs of the natural environment?](#)

No. Regarding the natural environment it seriously lacking protection and meaningful management, increasing the size of the MPA is rather meaningless, other than targeting a certain fishing practice, as many other extractive or disturbing activities continue within the MPA. Page 22 states "Will consider benefits for people, and for marine life in its own right" marine life seems to well down the order of protection, there does not appear to be any management plan to improve, or implement protection to the habitats or species.

MSP will consider the full life cycle of commercially valued species, yet there is no specific designated protected areas for juvenile, or mature breeding stocks, we would suggest a series of NTZ's be implemented, with buffer areas around them for low impact fisheries. The Portelet NTZ is already showing early results of a 100% improvement of ormer and lobster stocks, surely such fishery management of stocks is the way to go, both species are in decline and currently management measures are not stemming any decline. Page 31 states that some fishers would like to see nursery areas protected, not sure why this was then not implemented.

The MSP will be subject to review and monitoring, we would like this to be more than in house, and self-interest reviews, and should be done in an open, transparent, and prompt manner. Ramsar areas are currently examples of areas with habit degradation and species struggling or lost.

Minutes of the Ramsar Authority and the Marine Resources Panel are only become publicly available for some time after the meeting (circa 11 months at the moment), there is no reason for such delays, normal practice is it to approve minutes at the next meeting.

Page 24 "ensure Jersey's unique natural environment is protected for future generations" there is little in the way of meaningful plans to improve protection, regulation, and enforcement.

Page 25 "Logical and transparent" something that is sadly lacking in marine management. It is a public domain, yet decisions are often made behind closed doors with a group of selective members.

Page 50 work to reduce emissions, there is no duty or gst on aviation fuel, or marine fuel, not exactly working is it? Our comments on this were dismissed. Sail power is a more carbon friendly way. We have the French coming over to take advantage of fuel that is half the price of theirs due to environmental taxes.

Boaters seek out marine mammals, a more robust system of managing these activities need to be looked into, maybe part of commercial licences could have an environmental remit within them, for example giving seals a 100 meter distance clearance, not chasing cetaceans, let them come to the boat. Visitors dropped at offshore reefs are often let to roam and do as they please, sometimes causing disturbance to the wildlife.

[Do you have a view on its impact on any of those areas?](#)

It will just increase the misleading process and perception where the public think a large part of our waters are protected, when in reality little will change. For example Ramsar designation has seen an increase in issues and disturbance for a number of species, and habitat within the area, it is currently managed by those who have an interest in using the area for their own means and wishes, and little in the way of meaningful conservation measures for wildlife are in place.

We are currently flagging up the issue of upturned stones and illegal fishing activities, the management and enforcement of the current MPA's is lacking, some of it is down to logistics, but some of it is to do with the lack of regulations, or the lack of implementation of the regulations.

This week we observed fishing activity within the NTZ, for example buoyed fishing gear was well within the zone on a bright sunny day, pleased to say when reported it was acted on promptly.

[Do you have a view on whether the right decision was made by Government to reduce the size of the Marine Protected Areas designated in the Plan from the 27% of territorial waters proposed in the consultation to 23% in the final document](#)

We think a more proactive move would have been to have created 1% of our waters as NTZ, which the section has been advocating for over 15 years, which we think would have been beneficial to all parties.

Some of the tweaking of the zones is we feel a poor decision, in that allowing a small access area on a boundary, that could be easily enforced, as it was, is now more complicated. Why was this not resolved in the initial stages?

[Do you have a view on the Government's consultation and how the feedback it received has been assessed?](#)

We had the coastal strategy in 2008, and that has just fallen away, and now we have the MSP as the proposed solution to growing issues, we feel in reality little will change, has the current MPA designation improved fisheries? Has it improved the habitat? This is debatable.

The proposed solutions to many of the issues are to continue working with current regimes, there needs to be a change, the marine resources panel needs to have a better public engagement and involvement.

Can we have clarification as to what is happening with the Ramsar Panel? We hear different accounts of changes being made to the way it is managed.

[Do you have a view on the new fishing zone framework?](#)

Will the MPA proposals stop over fishing, and stock decline? No. An east coast NTZ should be implemented as we proposed, and other areas looked into that would be suitable, these could be part of the current proposed or existing MPA areas.

[Do you think that your company, organisation or the activity you do will be adversely or positively impacted by any aspects of the Marine Spatial Plan?](#)

We asked for a NTZ in the east, this was rejected. So we would have to say there will be little change.

The east coast NTZ would have been a valuable addition to our work and research, and the area lends itself well to being used for research and education purposes, with the possibility of facilities in the vicinity that could be used to assist that.

We have suggested management solutions, this was rejected and the MSP solution is a beach warden, which we think is not detailed enough to suggest any meaningful management, or enforcement change. There needs to be something more robust implemented

The Coastal strategy suggested improvements in marine research and study, this does not appear to have materialised for us, other than actions taken on our own initiative.

In your view, are there any further considerations/solutions that should be included in the Marine Spatial Plan?

Yes; an East coast NTZ as we proposed. And other areas looked into as NTZ's

More protection for marine birds and mammals, and areas set aside either on a seasonal or permanent basis, and monitoring of such areas improved

The creation of parishes having a designated honorary marine police officers, who could also undertake environmental, and education type activities as well as being enforcement officers. This could also be something adopted on land.

Better overseeing of the offshore reefs and the activities that take place there. Installation of cameras on nesting areas to monitor disturbance and predation, Alderney has webcams on bird nesting sites, so why not Jersey?

The Marine Resources Panel have more of a public representation on it, rather than a heavily commercial slant on it. Meetings in public, or available online.

The issue of turned stones is to be addressed according to the MSP by education, given that education has been the answer for the last 15 years, and the issue is increasing, it is obviously not working, there is a need to address this problem, and better regulations of low water fishers, some of whom create the problem. It is not an offence to turn and not replace a stone in a MPA, this is not wise use.

If so, could you provide further detail? → Are there any elements of the Marine Spatial Plan that raise concern for you? If so, could you provide further detail?

As above. It is good that so much work has gone into mapping the areas, and working out what activities happen where, but there does not seem the same enthusiasm to regulate and protect it.

To what extent do you think the Marine Spatial Plan will be successful in fulfilling its international obligations?

Little, it is not going to stop stock decline, habitat destruction, carbon neutral benefits. It may actually do more harm than good, with the public perception being that the work is being done to protect the area.

Do you have any information on whether Government has sufficient resources to implement and/or police any parts of the Marine Spatial Plan.

Yes, as above, issue of over turned stones, and illegal fishing, from our ormer tagging work and general observations there is evidence to show that it would appear there is out of season and undersize ormers being taken on a regular basis.

We support and are engaged with the Societe Jersiaise's comments on the wind farm which will follow.

Policing needs to improve, and be more robust, and act on infringements. We would propose French visitors to the offshore reefs apply for licences or permits to fish. This could be as part of an island scheme if the Jersey low water fishers would approve it.