Consultation Response from the British Sub-Aqua Club

Introduction

1. The British Sub-Aqua Club (BSAC) is the National Governing Body for the sport of scuba diving in the UK. There are over 200,000 scuba divers in the UK, and those divers witness at first-hand the impact of over-fishing and pollution in our seas. As well as appreciating the underwater environment, divers are a valuable source of sustainable income to many coastal economies in the UK.

2. It is in this context that we are responding, and so rather than respond to each site and feature specifically (Questions 1 to 7), we would like to respond more generally about marine conservation in the UK in reply to question 11. In particular, we agree with the proposed site and feature designations and welcomes the proposal to increase the number of Marine Conservation Zones (MCZs). However BSAC believes that this does not go far enough in discharging our duty to protect the underwater environment, and would like Government to go further in this area.

The need for genuine no-take zones

3. In particular, we remain concerned that the majority of current Marine Protected Areas (MPAs), including currently designated MCZs, still allow fishing activity to take place, including the most damaging of fishing practices – scallop dredging. **BSAC therefore calls on Government to establish genuine no-take zones where all fishing and scallop dredging is prohibited.**

4. The UK already has one no-take zone in Lundy, in the Bristol Channel. While this has had some positive impact, it is tiny – just 3.3 square kilometres – and as such does not demonstrate the full benefits of a no-take zone[1].

5. As such, to maximise their effectiveness, the new no-take zones need to be significant in size[2]. They should be rigorously enforced, as even one breach can cause severe damage[3]. They should also cover a wide range of different habitats, in line with our objective of maintaining and encouraging biodiversity[4]. **BSAC calls on Government to introduce several no-take zones protecting at least 180 km (1%) of our coastline.**

6. BSAC recognises that not everyone is as convinced of the benefits of no-take zones as we are, and even protecting just 1% of our coastline will receive some resistance. While we are convinced that all marine users, including the commercial fishing fleet and recreational divers, would benefit no-

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1 Hoskin, M., Coleman, R. & Carlshausen, L.V. (2009) Ecological effects of the Lundy No-take Zone : The first five years.

[2] Roberts, C.M., Hawkins, J.P., Fletcher, J., Hands, S., Raab, K. & Ward, S. (2010) Guidance on the size and spacing of Marine Protected Areas in England. Natural England Commissioned Report NECR037.

[3] Cook R, Fariñas-Franco JM, Gell FR, Holt RHF, Holt T, Lindenbaum C, et al. (2013) The Substantial First Impact of Bottom Fishing on Rare Biodiversity Hotspots: A Dilemma for Evidence-Based Conservation. PLoS ONE 8(8): e69904. https://doi.org/10.1371/journal.pone.0069904

[4] Ballantine, W.J. & Langlois, T.J. (2008) Marine reserves: the need for systems. Hydrobiologia, 606, 35- 44.

take zones all around the coastline, we are realistic and realise that this view is not shared by all stakeholders.

7. We can take some steps to overcome this resistance, for example by siting no-take zones in areas where fishing is already restricted. For example, offshore windfarms already have restrictions on bottom trawling to protect the electricity cables that connect the individual turbines. However, **BSAC would like the Government to implement an initial large-scale genuine no-take zone as a pilot area.** We are convinced that such a pilot would prove the benefits of a no-take zone to all marine stakeholders, including the commercial fishing industry.

8. To demonstrate the value of this approach, BSAC would like Government to consider the benefits of a large-scale trial no-take zone extending 10 miles along the coast, and 10 miles out to sea. (Consultation question 12) We would like to see such a pilot in a popular diving area which encompasses a range of marine habitats and features listed for protection in the wider MPA network, such as Bigbury Bay near Plymouth, or perhaps just off the World Heritage Jurassic Coast near Portland, protecting the environment above and below the water. In this zone all fishing, trawling, and scallop dredging would be prohibited. Such a zone would have some short-term disadvantages to the commercial and recreational fishing industry but we believe in the long-benefits would greatly outweigh these, as outlined below.

No-take zones benefit the fishing industry

9. As divers, we witness at first hand the damage and destruction caused by destructive practices such as scallop dredging – a barren wasteland of silt and sand that is devoid of life. As divers we can directly contrast this with the teeming life on nearby areas which are protected through natural geography, such as a series of rocky outcrops that make trawling and dredging impossible. While current MPAs have some benefits to marine life conservation, much of these benefits are negated by allowing fishing and dredging to continue in these areas, albeit at a lower scale.[5,6]

10. BSAC is firmly convinced that the evidence shows that complete no-take zones both increase the amount of marine life both in the no-take zone but also in the surrounding seas.[4,7,8,9] As well as being attractive to recreational divers, genuine no-take zones are also good for the commercial fishing industry.[10, 11, 12]

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[5] Denny, C. (2003) Do partial marine reserves protect reef fish assemblages? Biological Conservation, 116, 119-129.

[6] Lester, S.E. & Halpern, B.S. (2008) Biological responses in marine no-take reserves versus partially protected areas. Mar Ecol Prog Ser, 367, 49-56.

[7] Roberts, C. & Hawkins, J.P. (2000) Fully-protected marine reserves: a guide. WWF.
[8] Halpern, B. (2003) The Impact of Marine Reserves: Do Reserves Work and Does Reserve Size Matter? Ecological Applications, 13.
[9] Langlois, T.J. & Ballantine, W.J. (2005) Marine Ecological Research in New Zealand: Developing Predictive Models through the Study of No-Take Marine Reserves. Conservation Biology, 19, 1763-1770.
[10] Gell, F. R. & Roberts, C. M., 2003. Benefits beyond boundaries: the fishery effects of marine reserves. *Trends in Ecology & Evolution,* 18(9), pp. 448-455.

No-take zones bring economic benefits from tourism

11. Marine reserves also have significant economic benefits to the tourism industry that must be considered, and there are several no-take zones around the world which demonstrate this. Many people are aware of the "Green Zones" in Australia's Great Barrier Reef, where fishing and similar activities are completely banned. These areas are a world-renowned attraction, attracting thousands of tourists every year.

12. But it is not just warm-water destinations that attract tourists. Despite conditions and water temperatures similar to those in the UK, the Poor Knights marine reserve in New Zealand is another internationally renowned tourist destination, especially for divers. As well as supporting a large number of local divers and the associated local economy, the Poor Knights reserve also attracts divers from all around the world, including BSAC divers.

13. The UK already has a world-class diving attraction – the scuttled German fleet in Scapa Flow is an internationally renowned dive site, and attracts divers from all over the world. As well as providing direct support to many dive boats, local businesses benefit from supplying food, accommodation, and other things required by diving tourists. This can extend the tourist season far beyond the traditional summer months that tourists mainly visit our coastal areas.

Summary

14. In conclusion, BSAC urges the Government to implement genuine no-take zones where all fishing, dredging, and similar activities are prohibited. These areas need to be large in size, and rigorously enforced. As a first step to achieving the goal of protecting 1% of our coastline, BSAC calls on Government to create a pilot marine reserve in a popular diving area, extending 10 miles along the coastline and 10 miles out to sea.

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[11] Roberts, C., Bohnsack, J., Gell, F. & Hawkins, J., R. (2001) Effects of Marine Reserves on Adjacent Fisheries. *Science*.

[12] Beukers-Stewart, B.D., Vause, B.J., Mosley, M.W.J., Rossetti, H.L. & Brand, A.R. (2005) Benefits of closed area protection for a population of scallops. Mar Ecol Prog Ser, 298, 189-204.