

BORG response to the JNCC and Natural England Final Report to the Government, and issues relating to Eelgrass.

A. We believe Natural England has incorrectly assessed the risk levels to seagrass at various South Coast locations in the Final Report. In making these assessments they have used information which is out of date, and which subsequent reports have brought very clearly in to question.. We urge that the recent Seastar Survey results together with other reports which are shortly to be published, should be taken in to account before any conclusions are drawn about the status and COs of these areas.

B. We challenge the vulnerability assessment from the MB0102 sensitivity matrix (“highly sensitive to surface penetration / disturbance” with “high confidence”) in particular as applied to the Studland seagrass beds on the following grounds:

1. The seagrass beds in the MCZ areas along the South Coast, including those at Studland, The Solent, Torbay and Falmouth are composed of eelgrass, *Zostera Marina*, but the assessment was made for seagrass beds in general, and would include species which are known to be much more vulnerable to mechanical damage than eelgrass. It is therefore not an appropriate assessment for the eelgrass beds in these rMCZs

2. The assessment was made by “expert judgement” in a working party. There seems to be no documentation or evidence cited to support this judgement, and no record of the membership of the working party. This is not a transparent process.

3. The Seastar Survey of the Studland eelgrass beds clearly demonstrates that they are NOT “highly sensitive” to anchoring pressures, as no consistent statistically significant difference was found between anchored and non-anchored areas over two years.

4. The indisputable fact that significant anchoring has carried on in Studland Bay and Osborne Bay in the Solent for more than 50 years, yet the eelgrass beds are still present, healthy and probably increasing in extent, is a clear evidential proof that they are NOT “highly sensitive” to anchoring pressures. The same observation applies to other popular anchorage areas with Eelgrass species *Z Marina*. Evidence over-rides assessments in terms of confidence, especially subjective and undocumented assessments based on the wrong species!

5. Natural England has assured us they use the best available evidence to assess the sensitivity of the seagrass feature. They should do so.

C. We would like to draw attention to the cautionary note in the executive summary of the source document of the vulnerability assessment for the MB0102 sensitivity matrix (Tillin et al 2010, p.7):

“Care needs to be taken in using the information in the matrix, as it provides only initial broad-brush risk assessments for what are typically complex and site-specific considerations.....
....For many of the habitat FOCI and broadscale landscapes, the sensitivity of the feature varies depending on the specific biotopes within that habitat or landscape that are being assessed. In such circumstances, the MCZ/MPA regional projects may therefore need to obtain better information on the types of features being affected to support decision making.”

The comment on specific biotopes is particularly appropriate. Clearly the authors recognise that drawing firm conclusions from these “initial broad-brush risk assessments” may not be appropriate in many cases, and that is also our view in the present case.

We ask for an urgent review and revision of the COs and risk evaluations for all rMCZs in which species *Zostera Marina* is present.

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