



Mr Patrick Cotter
Defra
Area 2D Nobel House
17 Smith Square
London, SW1P 3JR

21 December 2007

Dear Sir

Defra consultation on measures to protect marine biodiversity in Lyme Bay from the impact of fishing with dredges and other towed gear.

Biodiversity South West is a partnership of 20 public, private, statutory, commercial, advisory and non-profit organisations which have a shared interest in safeguarding the region's natural environment, wildlife and habitats. Our vision is to have landscapes and water bodies, coasts and seas, towns and cities where wild species and habitats are part of healthy functioning ecosystems; where we nurture, treasure and enhance our biodiversity, and where biodiversity is a natural consideration of policies and decisions, and in society as a whole.

Biodiversity SW welcomes the current consultation and strongly supports Option C as the only viable measure which provides adequate protection for the very special biodiversity interests of the Lyme Bay Reefs.

The biological importance of Lyme Bay Reefs cannot be overstated, and the biodiversity that they support is of certainly of national and probably international importance. The area scored highly in a recent scientific assessment of marine biodiversity 'hot-spots' around the UK¹ rating amongst the top 4 in English waters. Natural England are currently carrying out an assessment of Lyme Bay against European nature conservation criteria and it is highly likely that the Lyme Bay Reefs will be included in new areas recommended for SAC designation.

The biodiversity value of Lyme Bay Reefs does not rest solely with the high profile species such as pink sea fan and other corals. Other organisms, for example the erect branching sponges, are of equal, if not greater, biological importance and recent survey work has found areas of live maerl – a UK BAP habitat – around the reefs. Many of the species and habitats of importance on Lyme Bay Reefs appear on the revised list of priority BAP species published earlier this year.

It is clear from the results of many scientific studies around the world that biological communities like those found on Lyme Bay Reefs will be impacted by methods of fishing that involve gear towed across the seabed. Scallop dredging is a particular cause for concern as a result of the additional damage it causes to habitats, degrading the cobble/boulder and soft mudstone areas of Lyme Bay

¹ Marine Biodiversity Hotspots in the UK: a report identifying and protecting areas for marine biodiversity, Hiscock, K and Breckels, M. Marine Biological Association, Plymouth, UK (2007)

The South West supports a high proportion of some of the UK's rarest and most endangered habitats and species. Nearly a tenth of the region's land area is designated as nationally and internationally important wildlife sites. It has the highest ratio of coastline to land area of any region making the maritime environment particularly significant.

The South West Regional Biodiversity Partnership aims to promote and enable the delivery of the UK Biodiversity Action Plan through regional and local biodiversity action in line with the England Biodiversity Strategy. The South West Regional Biodiversity Partnership includes Association of Local Government Ecologists, Countryside Agency, Natural England, Environment Agency, Forestry Commission, Government Office for the South West, Local BAPs, Local Record Centres, National Trust, RSPB, South West Protected Landscapes Forum, South West Water, South West Wildlife Trusts, Wessex Water and Woodland Trust

Reefs. We believe that restrictions should apply to all bottom towed gear, though recent data from Devon Sea Fisheries Committee suggests that scallop dredging is by far the major fishery using towed gear on the Lyme Bay Reefs.

Options A and B do not provide sufficient protection for the biodiversity interests of the Lyme Bay Reefs, leaving substantial areas of reef with high biodiversity unprotected. Biodiversity SW therefore strongly support Option C as the only one that provides adequate protection for the very special biodiversity interests of Lyme Bay Reefs. Option C will provide a sustainable future for the area's biodiversity interests, preventing further habitat damage and allowing recovery and regeneration of important biological communities. It will also provide a sustainable future for other economic activities in the area, which the Homarus report estimates as having around twice the value of scallop dredging.

However, the case for protecting the Lyme Bay Reefs rests with the biological argument, not the economic. The best way to protect the biodiversity interests of Lyme Bay Reefs – the stated aim of the consultation – is to implement option C. That there may be a positive economic outcome is an added benefit.

Yours faithfully

Roger Covey
Chair
Marine & Coastal Group
Biodiversity South West

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