

Response to Defra's consultation on Marine Strategy Part One: UK updated assessment and Good Environmental Status

20 June 2019

About Energy UK

Energy UK is the trade association for the GB energy industry with a membership of over 100 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas for domestic and business consumers. Our membership covers over 90% of both UK power generation and the energy supply market for UK homes. We represent the diverse nature of the UK's energy industry – from established FTSE 100 companies right through to new, growing suppliers and generators, who now make up over half of our membership.

Our members turn energy sources into electricity for over 27 million homes and every business in Britain. Over 680,000 people in every corner of the country rely on the sector for their jobs, with many of our members providing long-term employment as well as quality apprenticeships and training for those starting their careers. The energy industry invests over £12.5bn annually, delivers around £84bn in economic activity through its supply chain and interaction with other sectors, and pays £6bn in tax to HM Treasury.

Energy UK welcomes the opportunity to comment on the updated UK Marine Strategy and Defra's acknowledgement of the significant increase in economic productivity from the offshore renewable sector, and associated social benefit that this brings. The Government's Offshore Wind Sector Deal highlights the Government's ambition for this to continue to increase, which we believe will bring economic, social and environmental benefits for the UK's marine waters.

We would also like to highlight the impact that climate change is having, and will continue to have upon biodiversity. It is important that both the positive and negative impacts of activities in the marine environment have upon biodiversity are taken into account in setting targets. We therefore suggest that biodiversity targets also include a reference to climate change to highlight the positive impact that developments such as offshore wind farms have on populations by contributing to the UK's efforts to reduce CO₂ emissions and thereby mitigate climate change.

Response to Consultation Questions

Question 1. Does the UK Marine Strategy Part One provide an accurate reflection of the state of UK marine waters and the economic and social uses of those waters?

Energy UK welcomes Defra's acknowledgement in the UK Marine Strategy of the significant increase in economic productivity from the offshore renewable sector, and associated social benefit that this brings. The Government's Offshore Wind Sector Deal highlights the Government's ambition for this to continue to increase, which we believe will bring economic, social and environmental benefits for the UK's marine waters.

We would like to highlight the fact that, whilst there has been a significant decrease in the total Gross Value Added (GVA) of the marine economy, the Renewable Energy sector has seen a significant increase in productivity over recent years. The fact that the energy industry tends to create jobs that are higher skilled in nature ensures that the local economy sees the benefits of this productivity.

With the support and input of Energy UK, the Seabed User Development Group (SUDG) has recently completed its own assessment of the socio-economic benefits of marine industry and, unsurprisingly,

this comes up with some different figures. This will largely be because different methods of assessing values were used and because different aspects of industry may have been studied. There is no defined route for establishing these figures. Consequently, while the Part One report gives a good overview of marine industry, it would be very useful to discuss the SUDG report and see if this changes some of the figures used in the current assessment. It is important to emphasise though that any discrepancies between the two sets of figures are not desirable.

The report provides a good summary of the state of UK marine waters with evidence from a wide range of sources. Importantly, the report makes clear that there are aspects where we understand the pressures, but are not so clear about the potential impacts. This is particularly the case with noise where it is important that we do not apply measures which unnecessarily constrain activities without a clear understanding of the beneficial impacts of the measures. Clearly more work needs to be done in these areas to assess impacts and to use that information to identify measures that are clearly beneficial.

Question 2. To what extent are the proposed new criteria and associated targets sufficient to guide progress towards achievement of GES?

By and large we support the criteria and associated targets, which appear to be good guides towards the achievement of GES. Some of the targets are related to monitoring trends rather than seeing strict controls and Energy UK supports this as a means of ensuring that we have more objective information on which to make decisions about future activity. The importance of such an approach, though, needs careful consideration of the precautionary principle to ensure that unnecessary measures are not put in place which may damage development opportunities without necessarily securing any environmental benefit.

We like to see appropriate resourcing of monitoring and the key Regulatory and Statutory bodies to support the work to enable implementation.

Energy UK is currently working on the principle of net gain along with Defra and others. We consider that there must be strong opportunities to link the targets for Marine Strategy Framework Directive with activities associated with net gain as well as ensuring the mitigation hierarchy is met. This could apply to both monitoring targets and clear environmental actions.

We agree that the reduction or elimination of bycatch, particularly of birds, cetaceans and seals should be a focus for Defra for these species. It is important that the most impactful policy interventions (such as eliminating or reducing bycatch) are prioritised; other interventions should certainly be pursued, but not in place of these priority ones.

Question 3. To what extent are the proposed operational targets sufficient to achieve GES?

The proposed operational targets appear to help to develop the knowledge base necessary to more accurately assess the UK's seas' progress towards GES; however, once the status of this progress is known, it is likely that more specific targets will need to be developed in order to deliver GES in areas which have not already achieved this. Where more targets are developed, we believe that these should be Specific, Measurable, Relevant and Timely (given that Defra is committed to achieving GES, targets would by definition be considered to be Achievable).

We would also like to highlight the impact that climate change is having, and will continue to have upon biodiversity. It is important that both the positive and negative impacts of activities in the marine environment have upon biodiversity are taken into account in setting targets. We therefore suggest that biodiversity targets should also include a reference to climate change to highlight the positive impact that developments such as offshore wind farms have on populations by contributing to the UK's efforts to reduce its CO₂ emissions and thereby mitigate climate change.

Question 4. Where gaps have been identified do you have suggestions on how these could be filled?

As discussed in our response to Q3, we suggest that reference should be made to the impact that climate change has on biodiversity. As Greenhouse Gas (GHG) emission reductions targets are set elsewhere in Government, we do not suggest that specific targets are set in this strategy; however, we suggest that when assessing the impact that activities are having on biodiversity, the indirect impact on biodiversity through GHG emissions and the reduction of GHG emissions should be considered.

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