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To: Tom McCormack
Head of Marine Conservation
Marine Management Organisation
Lancaster House
Newcastle upon Tyne
NE4 7YH

Sent by email to: Conservation@marinemanagement.org.uk

Dear Mr McCormack,

We write to you in relation to the MMO's recent [Call for Evidence](#) on its Stage 2 assessment of the impacts of fishing using bottom towed gear in Marine Protected Areas (MPAs).

At the outset we wish to express our strong support for the MMO's ongoing efforts to meet government's commitment that appropriate fisheries management measures are in place for all offshore MPAs in English waters by the end of 2024. Starting with the byelaws confirmed at Stage 1, this work will not only promote the long-term viability of the fishing sector, but also broader targets to achieve good environmental status in marine waters.

After undertaking an initial assessment of the Call for Evidence, we note reference to high-level management options which, in our view, have the potential to risk a failure of compliance with environmental law. Specifically, we refer to options 1 (no fisheries restrictions) and 2 (no statutory restrictions). We do not consider these options would be sufficiently precautionary to discharge the MMO's duty to ensure that appropriate steps are taken to avoid the disturbance or deterioration of habitats and species for which sites have been designated.

Noting that the MMO is still reviewing all the available evidence and will not announce a final decision on management measures to be adopted until 2023, we will await the outcome of this exercise. However, we wish to keep you fully informed of both our interest in the marine environment and our concerns about the options set out in the Call for Evidence. Given that, as you may be aware, part of the OEP's role is to investigate potential failures to comply with environmental law.

If you have any questions relating to the information above, please do contact me using the contact details provided below.

Yours sincerely



Helen Venn
Chief Regulatory Officer
Office for Environmental Protection



[Website](#)

