

## Implementation of the MSFD: results of an ESEC survey on NGO experiences

The Marine Strategy Framework Directive (MSFD) required Member States to conduct a public consultation on their Initial Assessment, the description of Good Environmental Status and associated Targets and Indicators by 15 July 2012. Between the 20<sup>th</sup> September and the 31<sup>st</sup> October 2012, the European Seas Environmental Cooperation (ESEC) conducted an online survey to take stock of NGO experiences with the national public consultations. In addition, the aim was to get an initial impression of the quality of the Member State reports.

The survey yielded **31 responses**, of which 30 from NGOs from **16 countries** (listed in annex) and one response from an international NGO. Below are the main findings; the annex includes a detailed overview of results.

### Consultation process

- **Participation:** eight out of the 31 respondents did not participate in the public consultation, either because the process had not started yet or was delayed (Italy, Malta, Ireland, Bulgaria), or because the NGO lacked human resources and time (Cyprus, Estonia, Greece, Romania).
- **Timing of the public consultation:** 59% of respondents indicated that their country involved stakeholders at the end of the reporting process, while 26% stated that stakeholders were involved from the start of the process. A Dutch NGO reported that the Dutch consultation took place during the entire process.
- **Length of the consultation period:** more than half (59%) of the NGOs considered the time given for the consultation was sufficient. 30% felt it was insufficient, while the rest pointed out that while time was sufficient, this was offset by the complexity of the reports
- **Promotion:** 52% of respondents felt that the public consultation was well publicized among the public and NGOs. 37% did not agree with this. In the opinion of the Dutch respondent the process was well known to NGOs and other stakeholders but not the general public.
- **Accessibility of the reports:** 56% felt the reports were written in a manner accessible to the general public, while 33% disagreed. Some pointed out that the reports were accessible to stakeholders but not the general public or that they were too complex.

### Initial Assessment, Good Environmental Status and Targets

- Half of the respondents considered the initial assessment sufficiently rigorous and accurate, reflecting all the relevant environmental aspects. The other half either found the reports lacking in quality or pointed to data gaps and gaps in knowledge
- On a scale from 1 (poor) to 5 (ambitious), 12 respondents (46%) rated the description of GES as 3 (average), 10 (38%) gave a below average rating and 4 (15%) evaluated it as good. No one gave the maximum rating.
- On target setting, 14 respondents (52%) found the targets poor or well below average, 8 (30%) considered them average and 5 (19%) good. None of the respondents evaluated the targets as ambitious.

### **What are your main concerns regarding the MSFD implementation process?**

- **Main concerns:** the fact that the MSFD does not provide for financial resources, the lack of awareness among NGOs and other stakeholders, the lack of concrete targets, the feeling that MSs will be relying on existing commitments (national and international) to deliver GES.
- **Additional concerns:** insufficient institutional capacity; delays in the process; complexity of the issue; lack of NGO capacity; predetermined priorities for maritime development; the process risks to be merely formal and not lead to concrete improvements; lack of information and awareness raising; lack in involvement of sectors other than the environment; vague timing; low levels of ambition shown for some MSs; lack of transparency; unclear basis of choices (political or scientific); low involvement of NGOs; lack of coherent approach between MSs sharing the same region or sub region.
- A concern expressed about the **Black Sea:** surrounded by two EU countries (Bulgaria, Romania) and four others that are not bound by EU legislation (Georgia, Russia, Turkey and Ukraine) there is a great uncertainty about the MSFD implementation. The EU is not party to any regional regulatory instrument.

### **What are the main gaps in information and knowledge in the reports?**

- **Common responses:** biodiversity and food web, non-commercial fish, energy/noise impact, lack of impact data and indicators, lack of data for certain descriptors.
- **Additional responses:** marine litter, contaminants and their effect on the ecosystem, sea floor destruction by minerals and sand extraction or shipping or gas and oil prospection.

### **What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)**

- **Main concerns:** the targets are too generic or qualitative instead of quantitative; there seems to be a mismatch between the targets and GES; the lack of data is used as the basis for not setting clear targets; action plans and targets are based on already existing action plans and international obligations (business as usual approach); international coordination among regions and sub-regions is unclear.
- **Additional concerns:** insufficient coordination between competent authorities, lack of political will, lack of precautionary approach, benefits of improving the environment are not assessed, initial assessment not providing sufficient information.

### **Contacts**

The European Seas Environmental Cooperation (ESEC) is an informal network between Seas At Risk (SAR), the Coalition Clean Baltic (CCB), the Mediterranean Information Office for Environment, Culture and Sustainable Development (MIO-ECSDE), and the Black Sea NGO Network (BSNN), which work for the protection of the marine environment in Europe's regional sea basins: the Baltic, Black and Mediterranean Seas and the North-East Atlantic Ocean.

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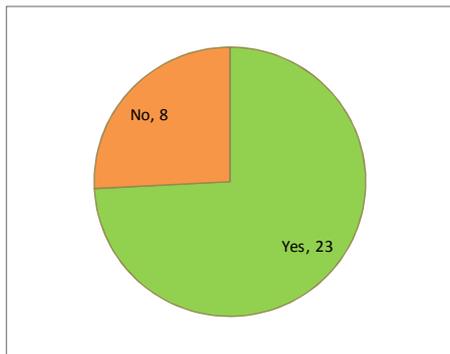
## Annex 1- Analysis of questionnaire results

### Total number of responses: 31

- 30 responses from NGOs from 16 countries, i.e. Bulgaria, Cyprus (3), Denmark, Estonia (3), Finland, France (4), Germany, Greece (2), Ireland, Italy, Malta, Netherlands (2), Portugal (2), Romania, Slovenia, Sweden, United Kingdom (4)
- 1 response from an international NGO (evaluation related to Celtic Seas + Channel, Atlantic, Mediterranean)

#### Did your organisation participate in the public consultation?

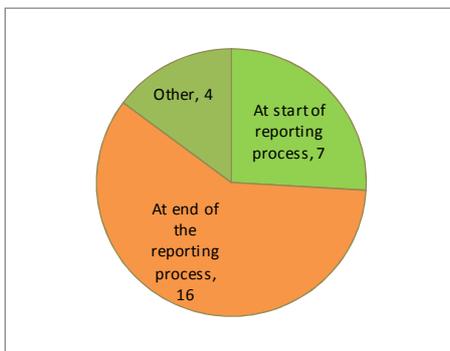
Responses 31



No	Why?
Bulgaria	The preparation process of the MSFD is delayed a lot and the first opportunity to discuss anything will be after May 2013 at the earliest. Initial assessment and GES and indicators and targets were commissioned only a month ago.
Greece	There was no information or prior notice on the timing of the online Greek consultation ( <a href="http://marinestrategy.opengov.gr">http://marinestrategy.opengov.gr</a> ), which would allow us to plan and make time for our participation. In addition to this, Greek consultation took place during the July-Sept: the most busy months for our NGO. Lacking human resources and available time, we were unable to make a contribution to the consultation.
Ireland	Not asked!
Italy	Because we haven't seen a public consultation on MSFD yet
Malta	Malta has fallen behind and has not completed any of the three tasks listed above as a result, public consultation has not yet commenced.
No answer	Romania, Cyprus, Estonia

#### At what stage in the process were NGOs and other stakeholders involved?

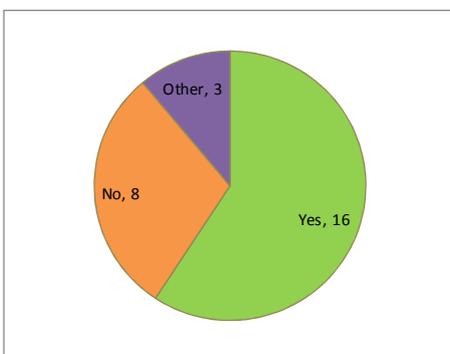
Responses 27



<b>At end of reporting process</b>	Portugal, Estonia, Portugal, Greece, UK, France, Greece, Denmark, Wales, Estonia, Slovenia, Romania, Finland, Germany, Cyprus, International NGO
<b>At start of reporting process</b>	UK, Netherlands, Cyprus, France, Sweden, Cyprus, UK
<b>Other</b>	
France	Middle of the process NGOs and stakeholders were informed at the beginning of the process, but the consultation really started when the reports were drafted
Malta	Public consultation has not yet commenced, and we suspect that it will commence once draft reports are prepared. The reports would then
Netherlands	During the entire process
<b>No answer</b>	Italy, Estonia, Ireland, Bulgaria

#### Was sufficient time given for the public consultation?

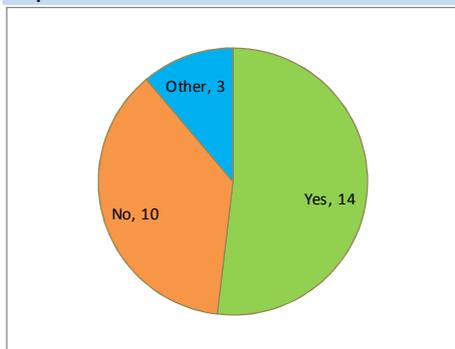
Responses 27



<b>No</b>	Estonia, Finland, Portugal, Wales, France, Sweden, France, Estonia
<b>Yes</b>	Cyprus, Denmark, Estonia, France, Germany, International NGO, Romania, Slovenia, UK, Cyprus, Cyprus, Netherlands, UK, UK, Netherlands, France
<b>Other</b>	
Greece	The on-line public consultation would have been considered as sufficient in terms of time, as it lasted 3 months (from 1 July to 30 September 2012). However, most of the reporting sheets were only made available to the public towards the end of consultation period. In our opinion, this did not allow adequate time for appropriate review, analysis and response.
Portugal	the time given for the consultation was a month. although the text was too long with no executive summary which made a very difficult task to
Greece	There was sufficient time, but see below

**Was the public consultation well publicised amongst the public/NGOs?**

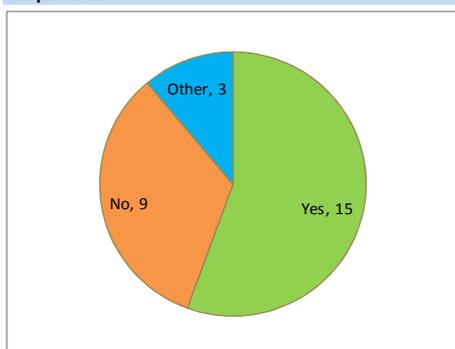
Responses 27



- Yes** Finland, Wales, Portugal, Cyprus, Denmark, France, Germany, International NGO, UK, Cyprus, Cyprus, Netherlands, UK, France
- No** Estonia, Portugal, France, Sweden, France, Estonia, Greece, Greece, Slovenia, UK
- Other**
  - Malta Consultation not yet commenced
  - Estonia could be better
  - Netherlands it was well known for ngos or stakeholders but difficult for a general public
- No answer** Ireland, Italy, Bulgaria, Romania

**Were the reports written in a manner accessible to the general public?**

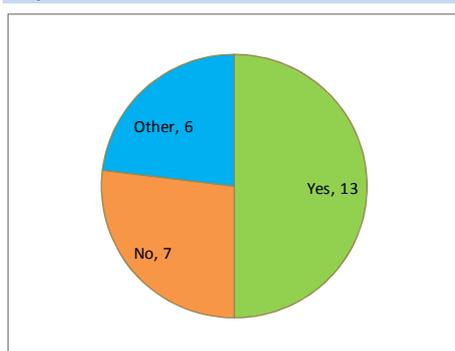
Responses 27



- Yes** Estonia, Netherlands, Estonia, Slovenia, Romania, Finland, ,Wales, Cyprus, France, Germany, International NGO, Cyprus, Netherlands, UK, France
- No** Portugal, France, Sweden, France, Greece, UK, Denmark, UK, Cyprus
- Other**
  - Greece Not for the general public; yes for involved stakeholders
  - Malta Reports not yet completed.
  - Portugal The report was very long and quite complex to follow
- No answer** Estonia, Ireland, Italy, Bulgaria

**Is the initial assessment rigorous and accurate, reflecting all the relevant environmental aspects (i.e. the criteria included in the MSFD and in the Commission’s Decision on criteria and methodological standards)?**

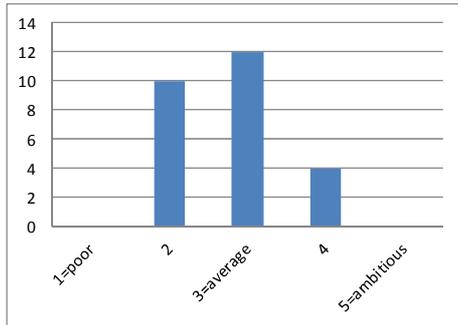
Responses 26



- Yes** Sweden, Estonia, Netherlands, Slovenia, Romania, Finland, Cyprus, France, Germany, International NGO, Cyprus, UK, France
- No** Portugal, Greece, Denmark, Italy, Greece, Wales, Netherlands
- Other**
  - Portugal For some descriptors, specifically for D4, D10 e D11, few data a biased indicators were used. the use of such indicators were justified with little or now information on the subject.
  - Estonia formally all the aspects have been taken into account
  - UK Generally accurate but misleading in its optimistic tone. No environmental data used since 2010 for the UK.
  - France The documents of the initial assessment are highly elaborated... but underline a lack of knowledge on many subjects
  - Very global
  - Malta This task is not yet complete.
- No answer** UK, Cyprus, Estonia, Ireland, Bulgaria

**Is the description of Good Environmental Status in your country's marine strategy sufficiently ambitious?**

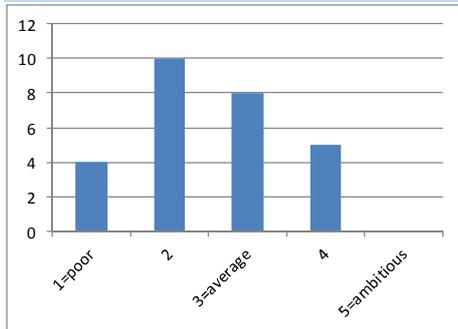
**Responses** 26



- 1
  - 2 Portugal, Portugal, Estonia, UK, Greece, Netherlands, Italy, Netherlands, France, UK, UK
  - 3 Greece, Denmark, Wales, France, Sweden, Estonia, Slovenia, Finland, Germany, Cyprus, Romania, Cyprus
  - 4 Cyprus, International NGO, UK, Estonia
  - 5
- No answer** Ireland, Bulgaria, Malta, France 2x

**Are the environmental targets set by your country's marine strategy sufficiently ambitious?**

**Responses** 27



- 1 Greece, Netherlands, France, UK
  - 2 Portugal, Estonia, UK, Portugal, Netherlands, Italy, Greece, Denmark, Romania, France
  - 3 Wales, Sweden, Estonia, Finland, Germany, Cyprus, International NGO, UK
  - 4 France, Slovenia, Cyprus, Cyprus, Estonia
  - 5
- No answer** Ireland, Bulgaria, Malta, France

NGO's country	What are your main concerns regarding the MSFD implementation process in your country?	What are the main gaps in information and knowledge in the reports?	What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)?
Bulgaria	Delays, insufficient institutional capacity, gaps in the information and knowledge database. The process in the only other EU member in the Black Sea region - Romania, is also delayed, but the initial assessment is already published on the site of the Grigore Antipa marine research institute. That was only recently and I am not certain if any steps toward public consultation have been made.		
Cyprus	Public participation is not a structured process. As mentioned above, my major concern is that MSFD will be implemented by competent authorities just to comply with the EU requirements and not for the real benefit of the country.		
Cyprus	It is a very complex issue needing much expertise which is hard to find in small countries	Mainly noise. There are also gaps in information on deep sea habitats and species	Targets and Indicators
Cyprus		none	targets are ambitious
Denmark	There is not sufficient and precise targets set for restauration of threatened species, for reduction of input of harmful substances or for reducing physical disturbance of the sea floor from primarily heavy fishing gear - all of which are the major threats to the marine ecosystem according to the status report. .	on species and nature type abundance and mapping, on harmful substances (sources and concentrations in water, bottom and biota) on noise and litter	get setting not ambitious enough - see above remarks.
Estonia	Lack of capacity in the NGO sector. The limited number of existing experienced NGO experts, still, are used in smaller scientific projects for planning protected marine areas. There is a predecided priority to develop port infrastructure and other large scale economic developments (in the government sector).	The experts say that there are enough studies done on the usage of the sea resources but studies on the ecosystem services and costs related to them are totally missing. Statistics on marine economic activities are not detailed enough and cannot be structured according to administrative units. Existing databases need to be interrelated in the next stages of the implementation process.	The action plan and collection of environmental targets is based on the already existing national sectoral action plans and development programs, international obligations and targets but it is still said to enable to integrate areas and fields that have not been covered so far.

NGO's country	What are your main concerns regarding the MSFD implementation process in your country?	What are the main gaps in information and knowledge in the reports?	What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)?
Estonia	Process is formal and will not lead to any added value in the protection of marine environment.		The documents are produced in a way that may formally look good but would not lead to any actual improvements.
Estonia	more informing/awareness raising needed how to involve also other sectors than environmental into implementation of MSFD lack of data for some descriptors	descriptors 7, 10, 11	quite general targets
Finland	It gives more power to earlier commitments like HELCOM BSAP, but not more. The biggest gap is that it does give more financial resources. The document is rather good description about status quo, but what is really going to happen?	Not many fish species, mainly sea trout. Some game animal chapters are irrelevant, you can see that e.g. seal and cormorant texts are written in the Ministry of Agriculture and Forestry.	It all refers to old commitments and the main target level is HELCOM BSAP. Of course, it gives more power to it, but it doesn't go beyond it. There is "nothing new" - you can't find new number targets! In addition, the paper is not practical enough. It is policy level paper, collection of best wishes.
France			In the Initial assessment, there is a lack of data and knowledge about many environmental issues. Targets and Indicators aren't sufficiently ambitious. In three of the french marine sub region, they only have general targets.
France	In our field of competence, we are interested by the sensibilisation of the public, the education to sustainable development	There is a lack of a concrete mobilization by all peoples concerned by environmental issues	Our Mediterranean sea is threatened. it is necessary to react very quickly and together, to provide the mean of an effective action at short time
France	The resources won't be committed to correctly implement the MSFD.		The targets are broad and not operational enough. The targets related to D8 are particularly not ambitious. There are no targets for pollution from land based sources.
France			
Germany	In our opinion the process was adequate: - 6 months for public consultation - German authorities met all deadlines - transparency of the public consultation process was given  Better: Involving NGOs from the start of the process	* Knowledge of biodiversity and foodweb in the EEZ especially outside the MPA is patchy * Not enough scientific data about non-commercial fish and their role in the foodweb * Weak database of litter in the EEZ and coastal waters * No concrete knowledge of containments (e.g.	1. GES and targets are ambitious but formulated imprecisely 2. No precise figures, data and deadlines to reach 3. Better harmonizing of the different activities in marine conservation concerning content and neighbouring countries without weakening the ambitious German approach 4. MSFD does not mention that/how the EU Common Agricultural Policy or Common Fishery Policy should be changed to fulfill the target of reaching the GES until 2020

NGO's country	What are your main concerns regarding the MSFD implementation process in your country?	What are the main gaps in information and knowledge in the reports?	What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)?
		<p>pharmaceuticals, pesticides, antifouling products, nano products) and its effects in marine ecosystems</p> <p>* Regarding many marine species there is no information about the harms of noise (esp. pile driving for off-shore wind energy plants)</p>	
Greece	<p>-Time plan of the implementation is extremely vague. Note that even on the DG's website the timing for the Greek consultation is still absent. -The object of the above-mentioned consultation was documents prepared by subcontractors, which as stated on the website "do not currently reflect the views of the Special Secretariat for Water and are not binding". This raises questions regarding how much importance the is attributed to the consultation process and the comments submitted.-The consultation process began just before the EC deadline and concluded after the deadline. This delay could be indicative of the general hasty and superficial implementation process in Greece. One Press Release to inform the public of the ongoing consultation was posted on the Ministry's website on August 13th (and not at the start of the consultation on July 1st). It should also be noted that no information day nor other informative events regarding the MSFD and the consultation were organised by the authorities despite its commitment to do so. The extremely low number of comments submitted is representative of an unsuccessful consultation.-The national Committee for the MSFD comprises only of the heads of Greek Ministry's and their relevant departments; the head of the committee can invite experts to these meetings. MEDASSET has not been invited as an NGO stakeholder. We are unaware which experts, scientists, NGOs etc have been consulted by the Committee or by the subcontractors (see above)</p>	<p>The review of the available scientific data for the Initial Assessment does not seem to have been thorough.</p>	<p>We fear that the targets and indicators are not ambitious, and are mostly qualitative instead of quantitative, or lack of data is used as the basis of not setting clear targets. There are also several inaccuracies and gaps in the technical report. Please also refer to the few comments submitted by other Greek NGOs regarding the documents on the consultation website</p>
Greece	<p>Continuation of the traditional top-down approach to decision-making/ lack of public awareness and participation, that will feed public mistrust and cynicism.</p>		<p>Critical gaps in knowledge, assessment and monitoring to detect significant trends over time and effectively assess the current status.</p> <p>Insufficient coordination and cooperation between and within competent authorities.</p> <p>Data collection is not comprehensive.</p> <p>Lack of strong political will to set ambitious targets.</p>

NGO's country	What are your main concerns regarding the MSFD implementation process in your country?	What are the main gaps in information and knowledge in the reports?	What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)?
Ireland	That there will be no stakeholder consultation		
Italy	I hope that the consultation will be started with contribution of the associations/NGOs interested in the MSFD. Their contribution is very important to ensure that the briefing will be usable.		Increasing the number of MPAs, and good process of teaching environmental skills to the population
Malta	<ul style="list-style-type: none"> <li>- Large data gaps</li> <li>- Ensuring the various competent authorities manage the process in an integrated manner</li> <li>- Ensuring sufficient resources are available or assigned towards effective implementation and management</li> </ul>	N/A	N/A
Netherlands	<ul style="list-style-type: none"> <li>- no concrete goals</li> <li>- lack of ambition</li> </ul>	- litter coming from rivers and other inland sources is completely missing	- goal marine litter: not concrete, only spoken of lowering trends.
Netherlands	process is difficult and not transparent. It is not clear what the basis for some choices is (e.g. science or political will).	on biodiversity factors (like food chain relations) underwater noise and litter	GES is not ambitious enough; targets and indicators have not been worked out well
Portugal	At this stage no news were given about the stage of the reports for Madeira and Azores.	<p>For this descriptors the reports is quite centred in the fisheries pressure and few considerations regarding other pressures as seafloor destruction by minerals and sand extraction or shipping or gas and oil prospecting are given.</p> <p>This seemed to be the easy way to getting on with it, because the data regarding fisheries is much more complete in several aspects and with longer time series, although it doesn't fulfill every descriptors and pressures identified.</p>	<p>We couldn't evaluate all the descriptors but in the several cases (D4, D10 e D11) we feel that should be used a more precautionary approach. In some cases the description of good environmental status is based on biased indicators and rely in very short time series, and probably they were very ambitious in setting the good environmental status.</p> <p>On the other hand, they should be more ambitious in setting targets and developing monitoring programs based in more accurate indicators than used right now.</p>

NGO's country	What are your main concerns regarding the MSFD implementation process in your country?	What are the main gaps in information and knowledge in the reports?	What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)?
Portugal	<p>- the whole process was rather late. Portugal did not attend most CIS or OSPAR meetings, changes in government and institutional reshuffling meant that the MSFD only became an issue around 1 year before the deadline.- the involvement of NGOs, to my knowledge, was almost non-existent. I don't know if other sectors were consulted. Only 1 month was given for the public consultation (which started on a Saturday... NGOs knew about it from a national newspaper).- after having read the report, and in light of the low level of detail and ambition, I don't expect the MSFD process to drive significant action in terms of programmes of measures in Portugal...</p>	<p>The really gawping gaps regard biodiversity (it was claimed that there was not enough information even about iconic species such as cetaceans), marine litter and energy/noise.</p>	<p>- the report about Continental Portugal is a mere gathering of information from various sources: technical files for the designation of MPAs, fisheries data etc. No work was done to try and gather information about less well known issues, such as marine litter and energy/noise. Most biological information is very much focused in the (very few and very coastal) MPAs.- the target setting appears very weak. Again, existing targets were gathered in a big table; a few specific targets were set for 5 commercial fish species (things like "reaching Fmsy by 2015 if possible, otherwise 2020" - even in instances where we are already very close to Fmsy); general targets regarding trends in marine litter were set, and it was indicated that after the 2014 monitoring programmes were in place these could be reviewed.- the assessment of the current status is overwhelmingly positive - GES has already been achieved in most instances. This is because, for example, for the fisheries indicators, anything that was considered by ICES to be "moderate" was considered by Portugal to be "Good".- it was very difficult to make an overall assessment of all the targets, indicators etc because Portugal only made available the (918 pages long) narrative report - they did not publish the reporting tables which they have to fill in for the Commission and which would have more easily understandable.</p>
Romania	<p>There are not too many information about impact of pressure in the Initial Assessment document. The impact is not quantified in space and time.</p>	<p>Dolphin evaluation stocks and noise descriptor are the main gaps.</p>	<p>There is much work to be done in order to understand and answer the MSFD requirements.</p>
Slovenia	<p>That we won't get enough support to achieve good environmental status in our country by the year 2020.</p>	<p>0</p>	<p>Our main concerns are:  - it would not be possible to achieve goals, that we have set about marine environment by the year 2020,  -maybe ngo(s) are not enough connected,  - that Strategy maybe does not include all indicators.</p>
Sweden	<p>It went too fast and the consultation documentation was not well prepared. Most indicators were still missing.</p>	<p>0</p>	<p>Insufficient number of indicators and unambitious targets.</p>

NGO's country	What are your main concerns regarding the MSFD implementation process in your country?	What are the main gaps in information and knowledge in the reports?	What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)?
UK	<p>1) The lack of ambition of government to define an ambitious level of GES and set targets which lead to an improvement of current environmental conditions.</p> <p>2) A reliance on existing policies and legislation to deliver GES and the assumption that these are all fully in place and effective.</p> <p>3) The lack of general awareness of the MSFD among many stakeholders and the entire general public in the UK, resulting in a lack of prominence of the MSFD as the central overarching environmental framework.</p> <p>4) The coherence between Member States sharing the same region or sub region.</p>	<p>There is a lack of information on aspects of marine noise and litter, food webs and ecosystem structure. However, evidence is available to make judgements on past states of biodiversity elements to set targets to improve the current environmental state.</p>	<p>1)The Initial Assessment painted an overly optimistic picture of the current state of the marine environment, and assumed that all existing policies and legislation, even those not yet introduced, will be fully and effectively implemented. This is not the case, for example, in delays in designating SPAs for seabirds or UK Marine Conservation Zones.</p> <p>2)The characteristics of GES are high level and are not matched by the underlying targets and baselines. The baselines are often used as current conditions, even where it is admitted that GES is not being achieved at the current time.</p> <p>3) There is no clear evidence of how the UK's proposals have been coordinated across their subregions, which is the scale at which GES will be assessed.</p> <p>3) Several targets simply call for the development of monitoring or indicators, rather than set targets to guide the monitoring.</p> <p>4) The massive benefits, environmental, social and economic of improving the environment are not identified, quantified or considered by the accompanying impact assessment.</p>
UK	<p>Fisheries targets might not be as ambitious as they might be regarding BMSY</p>		

NGO's country	What are your main concerns regarding the MSFD implementation process in your country?	What are the main gaps in information and knowledge in the reports?	What are your main concerns regarding the content of the marine strategy reports (Initial Assessment, Good Environmental Status, Targets and Indicators)?
UK		<p>We thought that the use of UK wide summary documents (Charting Progress 2) took precedence over Scottish Atlas and Northern Ireland State of Our Seas report in producing the overall assessment. We also thought that using summaries of summaries meant that a lot of finer scale detail was lost in relation to species and habitats and their states. We thought that 'data gaps' of which there were many in each indicator was used too often as an excuse to not develop targets or an assessment. The adoption of a precautionary approach would have been more suited in these cases. Particular broad categories where knowledge gaps were most evident were for cetaceans (indicator 1), fish biodiversity targets, food webs, noise.</p>	<p>We thought that the entire document was unwieldy, over complex, at times incomplete and confusing. We also didn't think that grouping indicators 1,4,6 together was the most effective way of presenting the issues. We thought that it would have been better had the UK Government looked at the impact of the pressure indicators on each of the biodiversity and hydrological criteria as per the German approach. In responding to the consultation we were most concerned about the initial assessment not providing sufficient information on all indicators. In particular, assessments of most cetacean species will only occur post 2015/2016, which will therefore mean that targets cannot be developed and implemented by 2020. Assessments of current state of many of the indicators was insufficient eg. noise, food webs, hydrographical conditions etc. We were also concerned about the lack of ambition demonstrated by the UK in the assumption that 'business as usual' would reach the targets of GES. There was little reference to the role of spatial protection measures in achieving targets. Furthermore, where two options of varying ambition were described, a greater preference appeared to be given to the least ambitious of the two. Noise targets were only for developing a noise register, without specific targets being developed (unlike Germany's approach). Marine Litter targets were particularly unambitious, given that it is an issue that has achievable outcomes.</p>
UK - Wales	<p>Tactics to achieve GES have been developed without sufficient stakeholder engagement. The proposed activities - mainly the establishment of Highly Protected Marine Conservation Zones (HPMCZ's) - do not take into account economic nor social impacts, nor are they designed to achieve the safeguarding of the marine environment. They have been determined by Countryside Council for Wales without consultation with those 'on the ground' - indeed the proposed sites for consideration have not even been visited by CCW in most cases.</p>		not clearly stated nor communicated
International NGO (Celtic Seas + Channel/ Atlantic / Mediterranean)	<p>General low level of ambition. Despite good and detailed initial assessment reports, the measures and indicators were either not defined appropriately to reach the environmental objectives. They are not specific enough, and it will be hard to assess progress against them.</p>	<p>in some cases, the absence of data, or area where conclusions are hard to take and further research is needed</p>	inappropriateness of indicators in relation to targets

