

## **RESPONSE TO CONSULTATION ON ENVIRONMENT AGENCY SUB-STRATEGY ON BIODIVERSITY**

The comments on this sub-strategy should be read in conjunction with the comments on the overall draft Corporate Strategy

This draft suffers from a poor structure, is overlong and repetitive, rendering it difficult to read or see the 'big picture'. It would benefit greatly from a Vision which would then inform the sub-strategy. It would also benefit from a summary of the key legislative drivers of the Agency's role in this area.

Detailed comments are made on the draft as track changes (qv). Our main high level comments are:

1. A serious lack of reference to the marine environment. The current Agency work on WFD demonstrates its past lack of attention to this area which is of vital environmental and economic importance to an island nation. It cannot deliver as Competent Authority without a strategic determination to reverse this failure and nothing in this draft suggests a serious intent to do so. This concern is exacerbated by the lack of any reference to the Marine Strategy Framework Directive
2. There is over-emphasis on past and present performance and insufficient on new, firm objectives and the changes needed to deliver them.
3. The critical importance of monitoring to assess current status, identify actions for improvement, and monitor achievement is missing. This is especially concerning given the current shortfall in data for high confidence in WFD assessments and the Agency's planned 20% reduction in monitoring.
4. The summary table has 27 actions/targets of which only four are quantified. The rest are just fine words against which delivery cannot be tested.
5. There is no clear intent to reallocate resources towards delivery of the strategy, including reversal of the drift towards production of policies and away from delivery.

Unless there is a major revision of the current draft to address these concerns SWRA/AT has no confidence that the sub-strategy will do anything to reverse the deterioration in the Agency's performance in both delivering its statutory fisheries duty and improving the environment on which those fisheries depend.