

Department for Environment, Food and Rural Affairs

TRIENNIAL REVIEW OF THE MARINE MANAGEMENT ORGANISATION

STAKEHOLDER QUESTIONNAIRE

The Triennial Review of the Marine Management Organisation (MMO) launched on 10 September 2013. As an executive non-Departmental Public Body (NDPB), the MMO is required to undergo a Triennial Review to ensure that it is still needed as an individual NDPB and that it is operating in compliance with the principles of good corporate governance.

Defra is interested in receiving responses to this questionnaire from the MMO's customers, stakeholders and delivery partners. This is to help us to understand their views of the organisation's current performance, and the scope and benefits of any potential changes to existing practices.

Please return responses to us by email wherever possible, or by post, to:

- trt@defra.gsi.gov.uk
- Triennial Review Team, Defra, Area 6D Nobel House, 17 Smith Square, London, SW1P 3JR

The closing date for responses is **Friday 11th October 2013**. Responses received after that date will not be considered as part of the Review.

Please provide your response to each of the questions in the space provided. There are no restrictions on length, and all boxes can be expanded. While none of the questions are mandatory, we would be grateful if you could answer every question. We are happy to receive supplementary information to support your answers, which can be submitted alongside your completed form.

Please provide your contact details	
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<p>Your response to this document may be made publicly available in whole or in part at the Department's discretion. If you do not wish all or part of your response (including your identity) to be made public, please mark this box.</p> <p>Please note that if your computer automatically includes a confidentiality disclaimer, that will not count as a request for confidentiality. Owing to freedom of information legislation we cannot promise that we will always be able to keep the content of your response confidential, however personal information will be redacted under those circumstances.</p>	
<input type="checkbox"/>	

1. Are you responding on behalf of an organisation, or as a private individual? If an organisation, what type of organisation is this?				
Public sector	Private sector / business representative body	Charity or other civil society organisation	Private Individual	Other
<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>
If 'Other', what type of organisation do you represent?				
If you represent an organisation, roughly how many employees or members does that body have?		<p>Wildlife and Countryside Link (Link) brings together 42 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 750,000 hectares of land.</p> <p>This response is supported by the following members of Link:</p> <ul style="list-style-type: none"> • Humane Society International/UK • Marine Conservation Society • Royal Society for the Protection of Birds • Whale and Dolphin Conservation • Wildfowl & Wetlands Trust • The Wildlife Trusts • WWF – UK 		

2.	<p style="text-align: center;">3. Which areas of the Marine Management Organisation’s work do you engage with?</p> <p><i>Please tick all that apply. If you are unsure, please refer to the documents published with this questionnaire for an explanation of these functions.</i></p> <p><i>‘Support services’ refer to head office functions such as Communications, Finance, HR etc.</i></p>							
Marine Planning	Marine Licensing	Marine Nature Conservation	Coastal Operations	Marine Compliance	Statistics & Fisheries Management	Managing European Funding	Support Services	None
X	X	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

<p style="text-align: center;">4. In your view, how well is the Marine Management Organisation delivering these functions?</p> <p><i>Please choose one response per statement, to help us to understand your views better. If you do not work with the function, please leave it blank.</i></p>						
Statement	Strongly Agree	Agree	Neither Agree Nor Disagree	Disagree	Strongly Disagree	Don't know
The MMO is delivering its Marine Planning function effectively	<input type="checkbox"/>	<input type="checkbox"/>	X ¹	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The MMO is delivering its Marine Licensing function effectively	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The MMO is delivering its Marine Nature Conservation function effectively	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The MMO is delivering its Coastal Operations function effectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The MMO is delivering its Marine Compliance function effectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The MMO is delivering its Statistics and Fisheries Management function effectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The MMO is delivering its Managing European Funding function effectively	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The MMO is delivering its Support Services function effectively	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

¹ Please see separate responses from Link member organisations for their individual views on each of these statements.

5. For any functions where you think the Marine Management Organisation is delivering effectively, please describe any evidence supports this assessment and what factors you believe are driving that effective delivery?

- **Marine Planning:** The MMO has held a number of successful workshops for local stakeholders and has demonstrated its commitment to marine planning by pushing ahead with the East and South Marine Plans. We are pleased that the plans contain strategic objectives to support the development of an ecologically coherent and well-managed MPA network.
- **Nature Conservation:** We welcome the MMO's work to implement Article 6 of the Habitats Directive for European Marine Sites. We are also pleased that the MMO has taken active steps to work with stakeholders to make decisions on conservation challenges.
- **Support Services:** Some parts of the MMO are more effective at stakeholder engagement than others. The Marine Planning team has been effective in its work to engage with local stakeholders in England. In addition, Link believes that the MMO's Stakeholder Focus Group is an effective forum.

6. For any functions where you think the Marine Management Organisation is not delivering effectively, please state what evidence you see that supports this assessment and what factors are driving ineffective delivery?

- **Marine Planning:** Link is concerned that the MMO's marine planning process in England has increasingly started to move away from the commitments and support for the ecosystem approach expressed in early engagement with stakeholders, towards a heavily development-focussed viewpoint. The process has centred around offshore wind, port development and aggregates as drivers for economic growth, while fitting other concerns around this primary aim. In addition, the first marine plan is not as detailed, spatial or integrated as we had hoped and lacks the certainty we were looking for.
- **Marine Licensing:** We are concerned about the MMO's increasing use of licencing exemptions for some damaging activities. For example, the aggregates industry no longer requires a licence to undertake sampling activity on the seabed. We are also concerned that the MMO's licencing of other damaging marine activities will result in a failure to achieve good environmental status for the marine environment by 2020 according to the Marine Strategy Framework Directive.
- **Nature Conservation:** Although the MMO has significant responsibility to protect the marine environment, we are disappointed that nature conservation appears not be a high priority for the MMO. We believe that the MMO is not sufficiently experienced in or knowledgeable about marine nature conservation. In addition, the MMO can be slow to act to prevent activities which damage marine biodiversity.
- **Support Services:** Some teams within the MMO need to improve their stakeholder engagement.

7. Please describe any other ways in which you feel the MMO could deliver any

of the functions listed more effectively.

- **Marine Planning:** The website listing planning applications in a list format is not user friendly and could be improved. It would be helpful if there was a function to search by project name, location or application number. A weekly bulletin listing planning applications would also be helpful.
- **Marine Licencing:** Link can see advantages of the MMO taking on a coordinating and distribution role with respect to informing stakeholders about marine applications as is undertaken by Marine Scotland.
- **Nature Conservation:** The MMO needs to improve its ecological knowledge, expertise and experience.
- **Support Services:** The MMO needs to be clearer about who the main point of contact within the MMO should be on various issues. Increased engagement between regional licencing teams and NGOs based in regional offices would be beneficial to ensure the right environmental experts are being consulted.

8. In your view, is it important for the Marine Management Organisation to continue to operate at 'arm's length' from Government? What is the basis of your view?

Public bodies such as the MMO should only operate at arms' length from Government for the following reasons: if their functions are technical and require external expertise to deliver; if the body requires absolute political impartiality (e.g. for certain funding or regulatory decision); or if their functions need to be delivered independently of Ministers to establish facts or figures with integrity.

Yes, for all the reasons stated in the example above. Additionally the MMO needs to remain independent and at arms-length to enable it to take a long-term view on the future of the marine environment, and not become subject to political cycles and timetables. For example, the marine planning process will be delivered over a number of years and over a number of political terms. In addition, the marine planning process requires a careful balance to be struck between many interests that are often competing for space, and therefore needs to be able to work at arms-length. This will also ensure that the UK meets its legal obligations under various EU Directives.

9. In your view, are there more effective ways to deliver the MMO's functions than the present arrangement (through a Non-Departmental Public Body (NDPB))?

Would one of the following (or any other option) be more effective: bringing the functions within central Government, changing to the division of responsibilities with other bodies, splitting up the functions of the MMO, transforming part or the whole of the organisation into a private or voluntary body?

Link supports the MMO as an NDPB. The MMO is a new body, having only been in existence for 3 years. Although we have raised areas where we feel the MMO could be delivering better, we believe that there are also many areas where it is working well. We therefore believe that now is not the time for institutional change and we would like to see the MMO remain as an NDPB for the foreseeable future.

10. Do you have any further comments that you would like to make?

Link welcomes the creation of the MMO and is keen to support the organisation as it develops. It is important that the MMO is adequately funded to allow it to effectively fulfil its responsibilities, ensuring that development in the marine environment is truly sustainable and biodiversity is properly protected.

Thank you for providing your views. We would like to keep you informed about the Review. Please tick the box below if you do not wish to be contacted by Defra in future regarding this Review.