



Jersey Marine Spatial Plan Public Consultation Response Summary

July 2024



Marine Resources Department

Ministerial Foreword

The first Marine Spatial Plan for Jersey will be a pivotal step in the management of our marine environment. Marine Spatial Planning is not a new concept, with many other jurisdictions already having a plan, or ambitions of creating a plan, to enable coherent and equitable management of their marine resources.

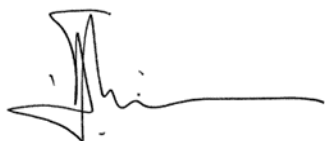
Following initial calls for a Marine Park, the previous government announced in 2022 that the Government of Jersey would produce a Jersey Marine Spatial Plan (JMSP). This JMSP was required to cover all topics concerning human use and biodiversity conservation of our marine space. In particular, the JMSP was required through the Bridging Island Plan, to recommend a network of Marine Protected Areas (MPAs).

The timing of the Jersey Marine Spatial Plan (JMSP) is key to informing the next iteration of the Island Plan. Previously, the Island Plan has only made decisions concerning the high-water mark and up. Going forward, the marine space can now be included within the Island Plan.

Initial in-person stakeholder workshops were held in March 2023 before the draft JMSP had been written. This was to allow for the JMSP to be shaped by those most connected to the sea. Following the release of the draft JMSP in October 2023, public consultation was carried out for 14 weeks to allow both local residents and also neighbouring jurisdictions to comment on the plan and raise any concerns, either online or in person.

I would like to thank all of the Islanders and our neighbours who took part in the consultation process. As you will see in this document and the JMSP, your views have helped to shape this plan into something that will guide our future relationship with the sea and benefit the island as a whole.

Overall, there was a great deal of support for the priorities and actions laid out in the plan, but there were also many adjustments or additions to consider and concerns to address. Every comment has been responded to and, in the interests of transparency, the survey responses have been published at the end of this report. I look forward to the States debate and I hope that the JMSP will be a positive step towards securing a thriving marine environment that will benefit all islanders, be they feathered, finned or footed.

A handwritten signature in black ink, appearing to read 'Steve Luce', with a stylized flourish at the end.

Deputy Steve Luce

Minister for the Environment

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Executive summary

A public consultation on the draft of the first Jersey Marine Spatial Plan (JMSP) ran from 24th October 2023 to 28th January 2024. The aim of this consultation was to gather views on the JMSP in terms of content and the priorities listed.

154 people responded in total, with 120 responding via the online portal and 35 via email. Comments were received on all topic chapters from both individuals and organisations. These responses were collated and split into various topics to inform the re-draft of the JMSP. This document summarises the key concerns and issues raised during the consultation process and details what has changed in the re-draft. The edited JMSP will be lodged for States Debate in late 2024.

The key changes resulting from the consultation process are:

- The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. See sections 8.6.8 and 9.4.3 of the JMSP and priorities NB6 and FA1.
- In addition to the above, a mobile gear Business Impact Assessment has been carried out on these boundaries. The need for this is highlighted in sections 8.6.8 and 9.4.3 (referred to as an Economic Impact Assessment) of the JMSP and action point NB5d.
- There were numerous concerns expressed by the angling community that commercial gear placed close to angling hotspots is problematic for them and this has resulted in a new action to review commercial potting and netting in these areas. See section 9.5 of the JMSP and action FA2e.
- Multiple concerns over beach and offshore reef management has resulted in an action for a beach warden and for increased awareness schemes. See section 11.5.3 of the JMSP and priority RT6.
- Following on from the above, a visitor centre has also been proposed following multiple comments about a need to improve education regarding the marine environment. See the new section 8.8 of the JMSP and priority NB7.

This report summarises the main themes identified by the public as concerns or opportunities for the JMSP and where these comments have led to a change in the text or priorities.

Introduction

A public consultation on Jersey's first Marine Spatial Plan ran for 14 weeks from 24th October 2023 to 28th January 2024. The Jersey Marine Spatial Plan (JMSP) concerns all uses of the marine environment and the ecological functions that support human activities, businesses and well-being.

The aim of the consultation was to gather views on the draft Marine Spatial Plan which was written following stakeholder workshops in March 2023 (please see the JMSP for more detail on these workshops). This report describes the consultation process and summarises the responses received including key themes and issues raised by respondents. It also identifies which priorities and actions within the plan have been amended or added in response to public comments.

The responses to the consultation have helped inform the redraft of the JMSP which is due to go to States Debate in late 2024. This report has been written to accompany the final draft of the JMSP to document what has been changed and why.

Hearing the views of children and young people

The opinions of children are valued by the Government of Jersey. Efforts were made to involve them in the consultation. Jersey, as a State Party, is accountable for upholding children's rights, as stated in Article 4 of the United Nations Convention on the Rights of the Child. This involves creating systems and laws to safeguard these rights. The JMSP could affect rights outlined in the United Nations Convention on the Rights of the Child. Details of how the JMSP may affect children's rights can be found in a separate Child Rights Impact Assessment.

Vote of no confidence

Towards the end of the consultation period there was a vote of no confidence in the Chief Minister which led to the selection of a new Chief Minister and Council of Ministers. During the transition period, the consultation continued but promotion of the consultation was halted. Following the appointment of a new Minister for Environment, the JMSP remained a delivery priority for the Marine Resources team. Only a short delay was incurred as a result of this change in government.

Consultation process

The Jersey Marine Spatial Plan (JMSP) public consultation ran from the 24th October 2023 to 28th January 2024. Islanders were asked to participate by reading the draft JMSP and filling out an online survey or by emailing comments to the MSP team. A dedicated email address (mshp@gov.je) was set up to receive these emails. There were a series of public drop-in sessions held at various Parish halls to make officers and information more accessible. These were held at:

- St Helier Parish Hall (16th November)
- St Brelade Parish hall (23rd November)
- St Helier Yacht Club (30th November)
- St Martin's Parish Hall (14th December)

The drop-in sessions were well attended and provided an opportunity for Islanders to ask questions or raise concerns about the plan following a short presentation by Marine Resources Officers. There were also two further workshops, one in St Malo, France (November 2023) and one in St Peter Port, Guernsey (January 2024), to inform them of the progress made on the JMSP and to invite their feedback.

The online survey and the parish hall drop-in sessions were promoted through social media channels (Facebook and Instagram) and on the government website on a dedicated Marine Spatial Plan page. There were a number of leaflets distributed and posters/banners erected around the island with the help of parish halls and local businesses to promote the consultation. There were also general media notifications, including a press release from the Minister of the Environment.

In addition to the online survey and the drop-in sessions, there were several smaller sessions with key groups or individuals where issues had been raised. These were primarily with the fishing industry who raised concerns about the business impact of the proposed Marine Protected Area network on their livelihoods. The Jersey Fishermen's Association were consulted specifically on this issue to identify ways of reducing this impact. There were also sessions within Government and with collaborative organisations such as Ports of Jersey and Jersey Heritage to help address the comments received by the public.

The online survey did not ask for identifying information from respondents but did include an option to provide an email. This was only to allow for officers to respond to a respondent if necessary. Email addresses or any identifying information shared in the comment section have not been included in this report and will not be shared outside of the core government officers that are working on the JMSP. Please see our privacy policy for more information ([Marine Spatial Plan \(MSP\) privacy policy \(gov.je\)](#)).

All comments submitted to the Marine Spatial Plan during the public consultation can be found at the end of this report. Comments that spanned multiple topics have been split into multiple rows with the same ID number. This was done in order for comments around similar topics to be considered together and to show which comments have resulted in a change to the text and/or priorities and actions with the JMSP. Some comments addressed multiple topics but could not be separated without losing the context of the comment, in this case the overarching topic has been selected. There is an action column and a justification column for each comment. A 'Yes' in the action column means something has been changed in the JMSP in response to the comment, whereas 'No' means there has not been a change. The justification column explains why there has or hasn't been a change. Where a comment identified an individual, the text has been redacted to remove the identifying information.

There were many comments that asked for the priorities and actions to go further and be further developed but it is not possible to provide this level of detail in the JMSP as each individual action will need further consideration as to how it will be implemented. For example, there were many comments relating to the management of the offshore reefs, with suggestions of how a permit system could work or how the role of a reef warden should be specified. While the JMSP team thanks everyone who gave this level of detail in their response, it is not possible to make these decisions in the JMSP. However, these comments will prove invaluable for future work on each priority and action point when it becomes its own stream of work with the relevant authorities and organisations.

Responses have been split into two main sections:

- Individual responses
- Organisation responses

The individual responses are anonymous and are listed in order of ID number, whereas the organisation responses are listed in alphabetical order. In some cases, a report was submitted alongside an organisational response to the MSP. In this instance, the report has been split into individual topic comments and included in the table. The full report has been included in the appendix where graphs and references were included as these could not be transcribed into the table.

Summary of responses

In total, 155 responses were submitted from both individuals and organisations and these were broken down into 376 separate comments relating to various elements of the plan. Each comment was assigned to both a broad and a specific theme, e.g. comments relating to dogs on beaches were assigned to a broad category of 'Disturbance' and then a specific category of 'Dogs'. This meant that many comments relating to the same topic could then be considered together before deciding on an action. The following section highlights the key themes, topics raised and decisions made. These are set out in the same chapter order as the JMSP, with a general comments section at the end. All responses to the JMSP can be read in full in the table at the end of this report.

Chapters 1 to 6 (introductory chapters)

There were only a handful of comments relating to the introductory chapters, one of which related to terminology used to define kelp habitat, and another highlighted the need to consider cross-border cooperation and collaboration. It is general practice with marine management matters to consult France and the other Channel Islands, all of which have participated in the public consultation. However, to include suggestions or priorities related to international cooperation on specific matters such as cross-border marine protection was considered outside of the scope of the JMSP but could be considered for future iterations. One other comment suggested the non-statutory nature of the JMSP should be made clearer in the introductory chapters; this has now been added to each introductory chapter for clarity. A section has also been added to explain how the JMSP priorities and actions will be put into practice despite the non-statutory basis of the document.

Chapter 7 (Seascapes)

There were only two specific comments received in relation to Jersey's seascapes and both were in favour of maintaining Jersey's natural identity and views both from land and sea. There have been no major changes to this chapter, only an addition to priority SC1 to maintain the special character of the coastal landscape as viewed from the sea as well as from land.

Chapter 8 (Natural Environment and Biodiversity)

There were 55 comments on this section (excluding the MPA network comments (n=90) which are detailed below). Multiple comments were in general support of increased marine protection that were unspecific to the MPA network (n=22), relating to various species and habitats, such as birds, marine mammals and seagrass, all of which are already covered under their own priorities. Other points raised that were already covered by a priority or action were:

- Disturbance to wildlife was raised multiple times, with calls for stricter regulations regarding jet ski use and dogs on beaches. Priorities RT5 and 6 already address this.
- There were some concerns about the environmental impact of nets and ghost-fishing; this is addressed by action FA2c.
- Increased protection for seagrass, this will be addressed by NB6.
- Improved management of Ramsar sites, many of these comments are addressed by priorities RT7 (offshore reef management plans) and NB5 (MPA network) which encompass all Ramsar areas, bar a small section of the paternosters Ramsar site. Priority FA2 to review netting regulations within the proposed MPA areas will address comments relating to netting within the Ramsar sites.
- There was strong agreement that more should be done to protect and enhance seagrass beds, this is covered under priority NB6. There was also agreement that eco-friendly mooring buoys should be incentivised where possible but not made a requirement due to a concern of associated costs.

Comments that were raised that resulted in changes or additions to priorities/actions/text:

- Several comments related to litter and pollution on beaches and in the water, this also came up in the recreation chapter. As a result of these comments, an action for a beach warden was added to RT6a.
- Offshore reef residents were concerned that ASPs (Areas of Special Protection) will impact on their ability to visit their properties. Priority NB4a has been expanded to recommend residents are consulted during ASP designations.
- Terminology was brought up a few times in this chapter. There was a question regarding the definition of kelp habitat, and whether it related to kelp forest or kelp park (which depends on the density of kelp). For the most part, the subtidal data is not detailed enough to accurately define this, so the definition of kelp has been clarified to include both types of kelp habitat classification and to highlight the need for more research to refine the habitat map where kelp is concerned. The text has been amended in section 8.6.3 and Action NB5c includes '*gaining a greater understanding of the distribution of migratory fish species and sensitive habitats*' which will include kelp.
- A comment was made about ensuring collaborative work is encouraged where marine survey work is concerned, as currently marine research is carried out by Government, NGOs, universities and through citizen science, but this is not always communicated across the groups. The new action in NB5f highlights the need for collaborative working between relevant organisations.

Some topics that could not be addressed were:

- Climate change mitigation measures; those relating to mitigation through supporting biodiversity are addressed through other priorities but comments relating to polluter pays taxes and duty on marine fuel are outside of the scope of the JMSP.
- Issues relating to upturned stones in the intertidal zone are a fisheries management issue but is difficult to address without recreation permits with conditions relating to matters such as returning stones to their original position.
- Increased monitoring and management of blue carbon habitats. This is already being addressed by policy EN5 of the Carbon Neutral Roadmap which is referenced in the text of the JMSP in section 4.4.4.
- Transboundary protections and migratory corridors for certain species. International cooperation is required to address these matters, and it is not possible to have specific priorities for transboundary protections within the JMSP.

Chapter 8/9 (Marine Protected Area network, proposed fishing zones)

A large number of comments submitted to the JMSP related to the proposed Marine Protected Area (MPA) network and the related fishing restrictions. The MPA network and the fishing zones are strongly linked as the MPA boundary is the same as fishing Zone B (seabed protection zone) which excludes mobile gear (trawling and dredging). It is for this reason that these comments have been reported on in their own section.

In this instance it is more appropriate to report on the number of individuals/organisations that were for or against the MPA network, as the break-down of responses into their individual comments resulted in multiple for or against comments from the same individual. The number of individuals/organisations in favour of the MPA network as it was recommended in the public consultation draft of the JMSP was 47, with a further 19 in favour of increasing the area. Reasons

given were due to interests in sustainability, improved biodiversity and fish stocks, a love for the marine environment, and reduced conflict with other marine users.

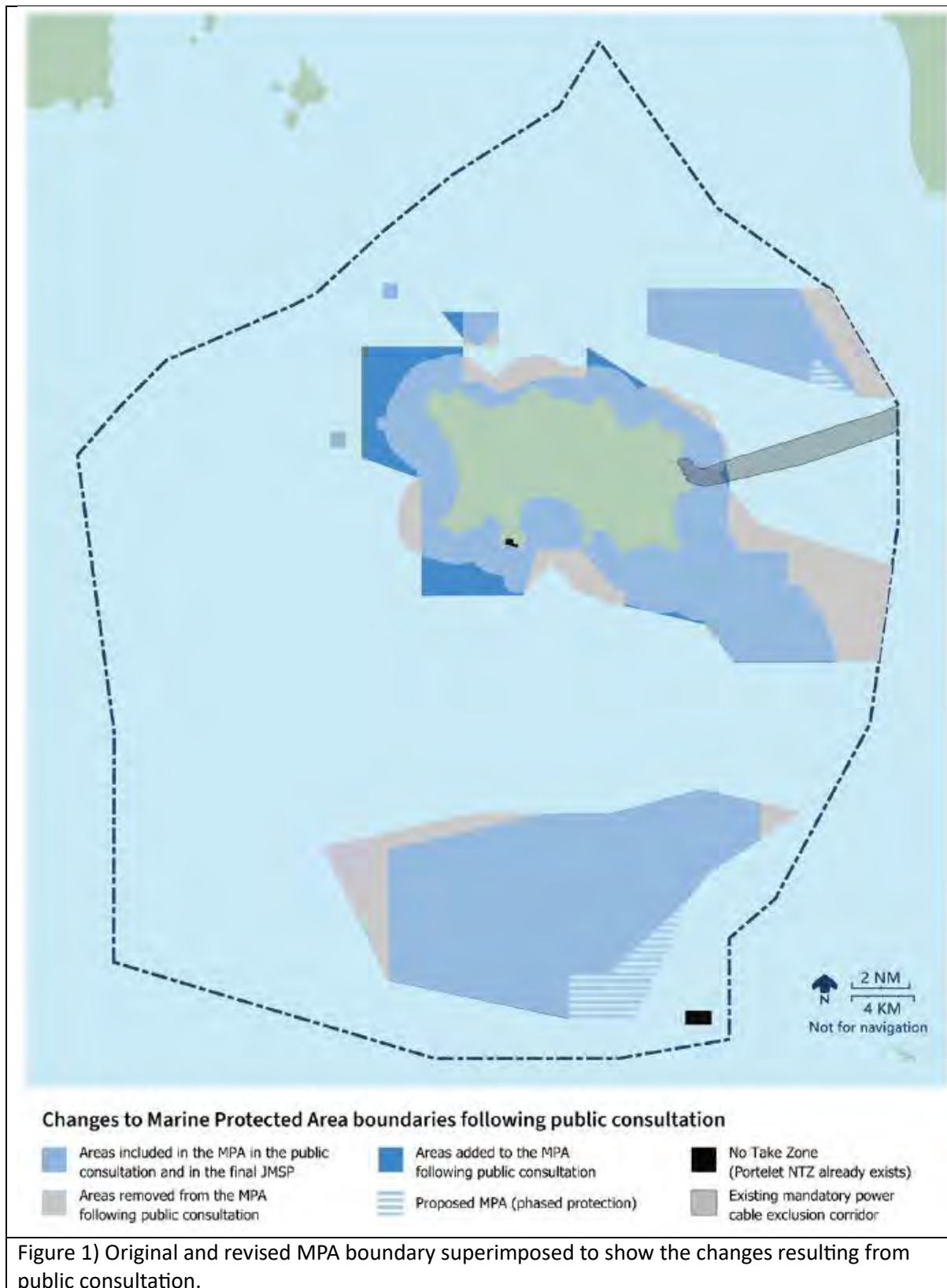
There were 24 individuals/organisations in disagreement with the MPA network, with the majority of comments received from the fishing communities in Jersey and France, highlighting the potential business impact on their livelihoods and a need for a business impact assessment to be carried out on affected boats. Several comments provided information on where the MPA network would have the greatest impact and requested to scale it back in some areas in return for expanding it in others. Other comments related to the predicted difficulty of navigating the MPA, with suggestions of straightening out the lines. Therefore, the new MPA boundary is much more angular than the original as many of the points are based from navigational marks or reference points.

Further consultation was carried out with the local fishing community to understand which areas were of greatest importance and a revised boundary has been included in the plan (Fig 1). This new boundary consists of multiple zones:

- MPA
- Phased protection areas,
- Further survey work areas and
- Seasonal access areas.

The MPA is the area where mobile gear would be excluded at the earliest possible opportunity, whereas the phased protection areas would be designated at a later date due to the high economic importance of these areas. This phased approach is suggested to follow a timeline of five years or to close the areas to mobile gear by 2030, whichever comes first. The survey areas require more work to refine the boundary, with further towed video surveys and benthic grab samples to determine hotspots and the overall distribution of sensitive habitat. The final areas of seasonal access do not count towards the MPA area as they do not have continuous protection from mobile gears and therefore cannot be considered protected. These areas were highlighted as being important winter fishery areas inshore around Jersey. Their original inclusion in the plan was for a) their shallow depth (identifying them as productive seabed) and b) for their proximity to the coast and therefore their increased conflict with other marine users (as the majority of coastal activities occur within 1 nautical mile of the coast). As coastal marine use is minimal in the winter (compared to summer), it was agreed that winter access would not conflict with the social use of these areas, and the benthic habitats were comparatively less sensitive to mobile gears than others as they are predominantly mobile sands which is thought to be tolerant to infrequent pressure from trawling. Further, trawling typically puts less pressure on the seabed than dredging (dredges consist of chain ring bags with metal teeth at the front, whereas trawls have rollers and a net/rope bag which drags over the surface of the seabed).

The No Take Zone (NTZs) recommendation at Les Sauvages (southeast of the Minquiers), while unpopular with some respondents, was on the whole supported (five against, four in support and six in favour of larger NTZs). No scientific evidence was submitted to the contrary of a No Take Zone at Les Sauvages and so the recommendation has remained the same. There were two comments suggesting that Catch and Release fisheries should be allowed in the NTZs but this is considered to be incompatible with the objectives of NTZs and also complicates the enforcement of NTZs.



The original MPA network boundary resulted in 27% of Jersey territorial waters protected from mobile gear, which would bring Jersey close to the IUCN recommendation of 30% protection by 2030. The new revised MPA boundary equates to 21.27 % of Jersey waters, with the phased areas adding an extra 1.06 % and the cable exclusion area an extra 0.91%. The NTZ at les Sauvages is 0.06

%. Combined, these zones equate to 23.3 % proposed as MPA area that is protected from mobile gear. The survey areas, if protected in their entirety, would add another 3.66 % and bring the total to 26.96%. The seasonal access areas (3.81%) are not considered to contribute to the MPA area but are shown on this chart to show the progress made during the consultation with the fishing industry. The seasonal access zones are shown in the fishing chapter but not the biodiversity chapter as they no longer form part of the MPA network proposal. The proposed MPA area in Chapter 8 (Natural Environment and Biodiversity) corresponds to Fishing Zone B in Chapter 9 (Fishing and Aquaculture) but with one discrepancy.

There was concern that anchoring in the current Portelet No Take Zone is negatively impacting the seabed in the bay and that there should be more thought given to this. There is now a recommendation to review anchoring impacts in Portelet under Action NB1a.

Other comments relating to the proposed MPA network were:

- There were a number of concerns around data quality, particularly in relation to the habitat map and the fishing activity maps. There are many datasets, reports and spatial layers (over 170) that have fed into the JMSP, some of which have been collected for many years or decades, others are standalone studies or reports carried out in collaboration with universities or by Government, many of which have been through a peer review process. The datasets used for the JMSP are deemed to be of an appropriate standard for a marine spatial planning process. All spatial layers will be available at the end of the JMSP process and can be investigated on an online platform.
- There were a number of responses from divers about the perceived benefit of MPA areas on scallop stocks.
- There were questions over how the MPA will be financed, both in terms of monitoring and management but also in terms of helping the fishing fleet transition to more sustainable fishing methods. Financing of monitoring is not determined at this stage but NB5d highlights a need to support the fleet.

There were multiple comments relating to the business impact of the proposed MPA network from both the local and French mobile fishing fleets. The proposed MPA boundary has been adjusted to reduce the impact on both the Jersey and French fishing fleets where possible and a business impact study will be carried out on all affected boats before the final version of the MSP is lodged for States Debate. A new action (NB5d) has been added to highlight the need to investigate alternative income streams or compensatory measures to help the fleet diversify away from mobile fishing.

There were a number of comments suggesting that the proposed MPA network was in breach of the Trade and Cooperation Agreement (2021). This is not the case as the suggested MPA network excludes mobile gear activities of all vessels, irrespective of nationality and also is in line with Article 494 parts a) applying the precautionary approach to fisheries management; b) promoting the long-term sustainability (environmental, social and economic) and optimum utilisation of shared stocks; and e) taking due account of and minimising harmful impacts of fishing on the marine ecosystem and taking due account of the need to preserve marine biological diversity. Part e of Article 494 in particular commits parties to ensuring fishing impacts are minimised on the marine environment and the wealth of evidence in relation to the negative impact of mobile fishing gears on seabed biodiversity cannot be discounted. However, the MPA boundary has been amended in some places to take economic concerns from both Jersey and French vessels into account (see section 8.7.3 in Chapter 8 and section 9.4.3 in Chapter 9).

Chapter 9 (Commercial Fishing and Aquaculture)

There were 52 comments on this section (excluding the MPA network comments which are detailed above). This chapter primarily received comments from the fishing industry, both from Jersey and France. The key concerns related to the MPA network which are detailed above. However, there were several other comments made separate to this concerning the future of the fishing fleet.

Points raised that were already covered by a priority were:

- Improved infrastructure and facilities to support sustainable fishing and to improve product value, such as ice machines and chiller units were suggested. Priority FA5b was deemed to address the need to support sustainable fishing through the provision of onshore facilities.
- Interest in promoting new aquaculture and phytoculture was highlighted a few times, which was already covered under FA3 and FA4.
- Ghost fishing (lost fishing gear that continues to fish) and pollution from lost fishing equipment was raised several times and is covered by FA2.

Comments that were raised that resulted in changes or additions to priorities/actions/text:

- Some comments related to concerns over the future of static fishing based on priority FA2 to promote safe and responsible use of potting and netting. The recommendation originally was created in response to workshop discussions about wildlife and human safety in relation to nets (concerns of entrapment for recreational swimmers and for diving birds), and therefore should not have had any measurable impact on static fishers other than potentially clearer marking of equipment for swimmers and, where birds are concerned, not setting nets in daylight hours (this is already practiced by most static net fishers). However, this topic received more attention during the public consultation with many respondents unhappy about the close proximity of nets and pots close to shore, particularly where they are in conflict with popular angling spots and so a new action has now been added which takes into account the concerns of the recreational angling community (FA2e).
- A need to support or compensate the fishing industry (both fishers and merchants) to mitigate any losses experienced as a result of an MPA network excluding mobile gear and to facilitate the move to more sustainable fishing methods. There was always a plan to carry out a business impact assessment on affected vessels following the decision on the final MPA boundary proposal, this has been made clearer in the text. And priority NB5d has been added in chapter 8 to highlight the need for industry support following any MPA designations to support this transition.
- A lack of understanding about where harbour limits are and therefore where illegal potting and netting may be occurring. This comment was made both in terms of an individual wanting to know where to fish and by several others in relation to knowing if someone is fishing illegally. A new action (FA2f) has been added to address this which highlights the need for increased signage in harbours.
- Several comments highlighted concerns with the terminology around the Fishing Zones which were previously, *Fishing Zone A Lightly Regulated Fishing Area*, *Fishing Zone B Seabed Protection Area* and *Fishing Zone C No Take Zone*. Lightly regulated was deemed to sound as though there was minimal regulation of fishing in this area, when it is actually just business

as usual which involves multiple layers of fisheries regulations and various fishing zones. Zone A has been changed to Regulated Fishing Zone to clear up any confusion.

Some topics that could not be addressed were:

- Addressing supply chains and food security; comments were raised about the quantity of imported fish and the amount that is also exported, making it hard to find locally caught fish in supermarkets.
- Fisheries specific initiatives, such as v-notching lobsters and extending the bass closed season, which will be addressed through fisheries management.
- Comments relating to the time frame of the JMSP being too short were initially addressed through extending the consultation period to 14 weeks (longer than the Island Plan public consultation). This allowed both Jersey and French fishing industries more time to submit responses and to highlight areas of the plan that concerned them the most. These comments have been taken on board and the JMSP amended where possible. In terms of the overall timeline for the JMSP, it is not considered too short a time frame for the work required and it is vital to have the JMSP ready in time to inform the next Island Plan.
- Multiple respondents were of the opinion that mobile fishing (dredging and trawling on the seabed) did not have a negative impact on the biodiversity or that it enhanced the health of the seabed. These claims are at odds with current accepted scientific knowledge, as represented in both local and international literature, that report on the damage caused by using mobile gears on sensitive habitats. While there are some habitats that can tolerate mobile fishing, such as mobile and coarse sands, the areas within the recommended MPA network are primarily recognised sensitive habitats such as maerl, seagrass, kelp, sandmason worm habitat and species rich sediments. Therefore, these comments have not been accepted in the adjustment of the MPA boundaries.
- An additional Fishing Zone D was suggested for sustainable and innovative aquaculture and phytoculture, but new aquaculture/phytoculture ventures will need to be considered on a case by case basis, with the location changing depending on the species and so cannot be defined on a map.

Chapter 10 (Cultural Heritage)

Cultural heritage received the small number of responses (n=7), with the majority coming from Jersey Heritage, who have been a key stakeholder throughout the writing of this chapter, the National Trust and the Societe Jersiaise. All comments were in support for maintaining Jersey's marine cultural heritage and a small number of amendments were made:

- There was a comment relating to a site of archaeological interest in the intertidal areas of the Dirouilles reef system (west of the Ecrehous). Photographic evidence was submitted so the suggested area has been included in figure 10c. The current priority CH4 already covers all intertidal areas of archaeological potential.
- Specific conventions relating to cultural heritage were mentioned in responses and these have been added to the text in section 10.1.3.
- There were also comments relating to military sites that were not covered in this chapter so these have now been added in section 10.3.1.
- A suggested amendment to priority CH5 to survey submerged landscapes has been updated to recommend that it should follow the MBES methods which are internationally recognised standards.

There were several indirect comments relating to cultural identity, primarily regarding Jersey historical fishing culture and the need to support the fishing industry to preserve this part of Jersey's identity. This is primarily covered by priority FA5 in the fishing chapter to support sustainable fishing. Additional text has been added to sections 9.4.2 and 9.4.3 to highlight the importance of fishing in Jersey's cultural history, and the need to provide support through the Marine Economic Development Framework to continue this into the future, with an emphasis on sustainable practices.

Chapter 11 (Recreation and Tourism)

Comments submitted relating to Recreation and Tourism were generally in favour of the priorities in this chapter but many felt they did not go far enough, which has resulted in some new priorities being added. Some suggestions were outside of the scope of the JMSP, these are detailed below.

One sector in particular, the recreational angling community, felt under-represented in the plan. While there was already mention of this sector and referenced maps of the distribution of angling around the coast, it did not highlight the importance of angling in Jersey's recreational and cultural identity. Extra text has now been added to highlight the importance and size of this community. There were also comments made about the lack of information available on recreational fishing, in terms of where anglers are fishing, when and what species are being caught. All forms of recreational fishing, except for scallop diving, are unpermitted and therefore numbers of recreational fishers are unknown, the same goes for general recreational users of the marine environment (swimmers, jet skis etc). A new action has been added in RT2d to recommend targeted studies are carried out to determine the frequency and location of recreational activities.

Points raised that were already covered by a priority were:

- Lockers/storage for watersports equipment was asked for by multiple respondents, this is already covered under actions CH2b and RT3c.
- Dog restrictions on beaches, either to reduce conflict with other users of the beaches or to reduce disturbance to wildlife, were raised multiple times but are already covered under RT5a.
- Comments relating to sea lettuce build up in St. Aubin's are already covered under current management.
- Concerns about over-use and increasing numbers of visitors to the offshore reefs are already covered under priority RT7 to create a management plan for the offshore reefs.

Comments that were raised that resulted in changes or additions to priorities/actions/text:

- Concerns were raised about access to slipways and this has been addressed with a new priority in RT4b to review parking on slipways to ensure access for all legitimate user groups. Further to this, there were comments about access in general and that the current priorities were insufficient and so extra priorities have been added in RT3d and RT3e to recommend improved coastal facilities and to increase slipway maintenance, especially in high recreational use areas such as St. Catherine's.
- As mentioned earlier in Chapter 8, there were several comments related to litter and pollution on beaches and in the water. As a result of these comments, a priority for a beach warden was added to RT6a.
- There were further comments relating to the conduct of powered craft such as jetskis, and safety of other marine users, such as swimmers, in the same area. This was already partially covered under RT1 and RT2 but due to the strong concerns raised about safety, a further priority to permit jet skis and ribs has been suggested in RT1b.

- Management of recreational fishing came up several times and in particular there was a comment suggesting a code of conduct for best practice. There was already a priority to create a 'Seaside Code' for marine users to encourage respectful use of the marine space. This has been expanded to include recreational and low water fishing.

There were multiple comments suggesting that improved education around the marine environment would aid in better public stewardship/marine citizenship. While education is not a spatial matter, recommendations for a marine hub that would provide the space for a combination of marine research and education have been included in priority IT9.

Some topics that could not be addressed were:

- Multiple comments relating to funding for watersports could not be addressed within the scope of JMSP.
- Support for cafes and hotels on seafronts to encourage tourism is outside of the scope of the JMSP, but maintaining access to beaches and maintaining them in a good state (potentially through a beach warden scheme, but also through continued monitoring of water quality) will ultimately benefit tourism.
- There were some respondents that were concerned they would lose access to the marine environment, particularly for recreational low water fishing. There are no recommendations within the plan to restrict low water fishing. This is only prohibited in Portelet Bay No Take Zone which is already established. The Sauvages NTZ recommendation is offshore and will not affect low water fishing. However, with an increasing population and increasing interest in low water fishing, some conservation measures are needed to ensure future generations of local fishers can benefit from the same fishing spots as today. Currently this is managed through bag limits (the number of each species that can be retained) per day of recreational fishing.
- Comments on an increased closed season for seabass also came up in relation to recreational fishing, in addition to increased size limits for seabass. There was also a suggestion that wrasse should be a catch and release only fishery due to the slow growth and long-life spans of these species. There was one further comment asking for bluefin tuna be opened up to recreational catch and release fishing. These are all outside of the scope of the JMSP but will be addressed through fisheries management.

Chapter 12 (Energy, Infrastructure and Transport)

This chapter received multiple comments relating to the windfarm that were outside of the scope of the JMSP. A separate windfarm scoping consultation ran at the same time as the Marine Spatial Plan consultation. The windfarm consultation was a very high level in principle consultation to determine if there was public appetite for a windfarm in Jersey (proposition P82-2023). It was not possible to share windfarm responses submitted to the JMSP with the windfarm consultation team as there was a risk of double counting responses from those that had responded to both consultations. The proposition P82-2023 has now been approved but there are still many steps to go through and at this stage no details about the windfarm have been decided. Following the debate on the JMSP, all of the responses will be shared with the windfarm team to inform their ongoing investigation.

The comments have still been considered as part of the JMSP consultation process. Several of the comments were detailed and related to a number of concerns and suggestions including, but not limited to, the size, position, connectivity to shore, impacts on wildlife and access for fishing. The Marine Spatial Plan only highlights the priority of investigating renewable energies and has identified an area of seabed that would be most suitable for offshore wind. The JMSP cannot address the

concerns and suggestions raised by the public but the priority relating to the windfarm (IT4) has been simplified to “An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced”.

Outside of the windfarm, there were 10 comments on this chapter, with most providing support for various priorities. There was support for the maritime hub in priority IT9, continued water quality monitoring, protection of the cable routes in IT1b and the recommendations to investigate renewable energy (IT3 and IT4).

Some of the priorities have been changed in order to help with the flow of this chapter but their content remains the same (IT3 relating to FEPA has moved to IT5 and IT4 and 5 have been moved up to IT3 and 4. There were only a small number of actionable changes in this chapter:

- Amendment to priority IT1b regarding protection of the Jersey-Guernsey power and telecommunications cable from mobile fishing gear. This has had significant push back from the fishing community for various reasons, but a sticking point being that it is not protected in Guernsey waters. The new recommendation is that vulnerable sections of the cable should be protected rather than the full length of the cable, but dialogue is needed with Guernsey to discuss future management of this cable.
- Priority IT1e for cable maintenance has been amended slightly to ensure that best environmental practice is used.
- One new priority in IT1f is related to ensuring that provision will be made for new cables that connect renewable energy installations to the land and that these must be subject to environmental safeguards.
- Priority IT3 (previously IT4) has been simplified but carries the same meaning with regards to offshore renewable energy development.
- Priority IT4 (previously IT5) to investigate tidal power has been expanded to ensure this is carried out subject to appropriate Environmental Impact Assessments.
- Priority IT7 regarding the retention of safe boat passages has been expanded to make it clear that this includes boat passages to and from neighbouring jurisdictions.

Some topics that could not be addressed were:

- Public dissemination of information regarding water quality – this is outside of the scope of the JMSP but will be picked up within departmental workstreams as making data more visible is a current aim within Natural Environment.
- Concerns around the impact of FEPA deposition grounds, should more be designated, have not been given a priority as these would already be subject to planning permission and Environmental Impact Assessments.

Other comments

There were several comments relating to climate change, with the general consensus that the plan does not address climate change enough. Some comments related to a duty on marine fuel or incentives for greener marine travel (i.e. sail power), other related to a lack of future proofing for both biodiversity and fisheries in terms of changing species distributions. These were all deemed to be outside of the scope the JMSP but a recommendations have been made where appropriate to allow for adaptive change/management and to review the JMSP periodically in light of new evidence to mitigate against climate change.

Many comments were made about the need for cooperative and collaborative working with neighbouring jurisdictions to ensure management is coordinated across boundaries and to ensure

good relations with the French fishing industry that have access rights to Jersey waters. There were also comments from French stakeholders that expressed their dissatisfaction with not being included in the initial workshops in March 2023. These workshops were an initial scoping exercise with the local Jersey community before the any of the draft plan was written. French stakeholders were invited to comment at a later stage during the public consultation phase, in addition to meetings with a number of French counterparts (government equivalents) at this stage which is deemed the appropriate way to engage with neighbouring jurisdictions. A similar approach was taken with Guernsey and also follows a similar process to Jersey's involvement in Frances most recent JMSP.

Other comments related to the need to have joined up MPAs and management across boundaries to ensure adequate protection of habitats and species. This isn't something that can be addressed by the JMSP as it can only set out spatial plans to be implemented in Jersey waters (it has no weighting in other jurisdictions). However, text has been added to ensure continued dialogue with neighbouring jurisdictions to work towards collaborative management of our shared fishing areas.

Some wording has been changed in the redraft to improve clarity. Comments relating to the priorities asking for the terminology to be changed from should to will could not be actioned as this document is not statutory and therefore advisory wording has to be used.

Appendix A. Public consultation comments

All comments submitted during the JMSP consultation are included in the following two tables.

Individual responses

Individual responses are listed in order of ID number.

Case ID	Topic	Comment	Action	Justification
JMSP-557875982	Renewable energy	I do not want to see our sea scape environment ruined by wind turbines and an industrial landscape as has been accomplished in Eastern England	No	Outside of scope of the JMSP - the JMSP does not go into the detail of a windfarm as Jersey is only in the early stages of investigating a windfarm following the approval of the proposal to the States (P82-2023). Local stakeholder and neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."
JMSP-557933909	Seabed protection	Protecting and enhancing the seabed ecosystems seems an important goal from the viewpoint to biodiversity, fishing, leisure, and blue carbon. Replacing damaging mooring chains seems an easy win.	No	General comment of support.
JMSP-557933909	Water quality	Let's please not forget to thoroughly clean the fresh water entering our sea from the island - land runoff free from fertiliser and pesticide residue, waste water free from residues of medicines and contraceptives , cleaning and toiletry products, and no plastic or microplastic pollution from homes and rainwater drains.	No	This will be addressed by priority IT2

JMSP-558391804	Disturbance	RT5;- As a person who is frightened of dogs, a regular swimmer and as a grandparent of small children I would like to see the exercise of dogs on the beaches better regulated. For instance having "family" beaches dog-free all year round (e.g. Green Island, Long Beach). Also people who are in the business of dog-walking more than one dog at a time should have those dogs on a lead at all times and muzzled. I have had my towels and clothes and my grandchildren's sand-castles urinated on by dogs that are clearly not under the direct control of the owner/walker. I feel threatened and am frightened by large dogs. This seems to have become much worse recently as dog-ownership has increased since Covid. There is also an increased risk in pollution from urination and faeces; across France, dogs are completely banned from tourist beaches in the summer.	No	This will be addressed by action RT5a.
JMSP-558452481	Renewable energy	Page 208. Renewable energy: wind power. State ownership of wind power generation would allow greater security for the Island and enable the islanders to benefit from excess production in terms of further reduced bills or ongoing public funding. Private ownership of this key infrastructure is better than it not being completed but would still seem like a major missed opportunity.	No	Outside of scope of the JMSP - the JMSP does not go into the detail of a windfarm as Jersey is only in the early stages of investigating a windfarm following the approval of the proposal to the States (P82-2023). Local stakeholder and neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."

JMSP-559078798	Access	<p>There is much made about improving access to the marine environment for islanders, I feel you have not really grasped the issue. Many people are in competition for the same resource, notably the slipways and car parks surrounding them, most activities require some equipment, and your plan says consideration must be given to building storage and reducing the equipment stored on beaches. This is all well and good, but we know that clubs and associations have scant funds to build new facilities, even if planning would give consideration. I feel realistic solutions to congestion should be sought. Improving facilities for swimmers at St Catherines, whilst simultaneously banning parking on the slipway would go a long way to easing tensions between swimmers, commercial operations, commercial fishermen, and the sailing club. Maybe a sensible way forward would be to refurbish the Turbot farm into lockers for swimmers to use, rather than seeking a new tenant, who will undoubtedly add to the burden on the site, rather than reduce it? On the subject of access again, the car park in Greve de Lecq has been closed for some time. Seemingly a perfect opportunity for a visitor centre with parking to be built, with facilities to improve access, storage for the dive club, and the commercial coastguarding operations could be fitted and the rest of the site made a multipurpose space for other recreational activities, and yet no such plans exist, other than a vague notion that the government may buy the site. On another note, many of the access points are not maintained properly, at a low water < 3m the end of St Cats slipway is uncovered, and the small boat launching ladder is in a dangerous state for swimmers and boat users, thought was given to replacing it, but this did not happen.</p> <p>The gold standard would have been to add steps for swimmers at the same time. In short the actions are about encouraging and supporting, rather than building and maintaining.</p>	Yes	<p>The lockers idea is already addressed by actions CH2b and RT3c. A new action (RT4b) has been added regarding parking on slipways. A new section (8.8) has also been added with a priority (NB7) for a visitor and education centre.</p>
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JMSP-559449584	MSP	This is all wrong,it's our heritage for us to use our coast as we like .This is all getting out of had	No	General comment of discontent with marine management. Everyone wishes to use the coast in a different way and it is therefore necessary to manage this to ensure there is a balance between different users.
JMSP-559582697	MSP	This is a brilliant initiative - Rest of the UK should take your inspirational lead- congratulations Jersey for proising this	No	General comments of support.
JMSP-559592332	Imports	to my dismay it is a challenge to find local non farmed fish for retail. Farmed fish has been proven to have very unhealthy toxicity which leads to health issues. It is vital that Islanders have healthy food thereby reducing amount of health issues which drain our health service plus people want to be in good health. I would like to see the Government of Jersey prioritising Islanders by supporting our local fisher people in giving them priority above any other country to ethically fish whilst reducing the amount/& species that France is currently permitted. In additio n to this; provision for an Island fish processing centre whereby Jersey could profit from excess catch which isnt sold. Or in theory if EC laws dont permit, fishing for a calculated island supply whilst preserving future fish stocks. Jersey has the potential to be self reliant in term of healthy less toxic or non toxic food. It would make sense to benefit our Islanders first & foremost whilst reducing over reliance on overseas imports which thereby makes for better food security & reducing environment damage through transportant & extra packing.	No	Outside of scope of the JMSP - this falls under current fisheries mangement
JMSP-560643081	MSP	The link doesn't work so all of it. It's a sledgehammer to crack a nut driven by people who don't have the interests of the Island at heart, who are not prepared to answer questions in public, who will use Jersey and move on once their political points are scored.	No	Sincere apologies for issues experienced with accessing the JMSP. The JSMP has sought information and advice from many different sectors and has been shaped by people who live and work in Jersey. It is designed to balance the needs of the variety of users in the marine environment.

JMSP-560787609	Fisheries Management	<p>Ramsar site - a very popular angling area shore and boat. Is there plans for restrictions? Is catch and release considered for any restrictions?</p> <p>Fisheries - shallow water netting, dropping nets low water area and leaving for a tide to trap all fish out west, splashing and banging boats in less than 4ft water in the south east. Frustrating for an angler particularly on low water treks and wading out west, south and south east of the island where you have to walk a long way. How will this project impact Fisheries abilities to monitor this ? Is there more resource in place, technology can't resolve this one and it's the main area of concern in fishing. They were on a good path, improving bass stocks through size limits, net mesh changes but now seem nowhere to be seen. I am still waiting to see improved quotas and size limits on gilthead bream/white bream/ thin lipped mullet which have been taken in mass in nets and impacted future stocks over the last few yrs. if they can't manage these things now, with likely more desk time to come, how will these areas be improved? Fish swim after all and my guess is this MSP has impacted their time to manage the fishery properly as they were in agreement that measures need to come in. But it's already too late as these species have thinned out in numbers. Would like to see a good plan for fisheries to manage the fishery back to standards of a couple of yrs ago when they had good momentum.</p>	No	<p>These points will largely be addressed by priority FA2. Ramsar site catch and release has not been considered at this stage.</p>
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JMSP-560787609	Harbours	Comments towards Ports of Jersey - not very nice comments in my opinion or deserved. The heritage at the harbour is being lost and rebuilt and the community is pulling together. No further restrictions please. It's managed well and they do act. Speed limits make a difference as do guidance signs in place. Users of the harbour understand and the community pulls together and respects other users. Leave it alone MSP, the island needs more solutions around storage, parking etc...in my opinion. The balance of users and safety is very good and these type of comments do not reflect well on the MSP attitude towards islanders.	No	Chapters involving the Ports of Jersey were written in close consultation with Ports and there was no intentional ill meaning towards the Ports of Jersey.
JMSP-560787609	Access	Coastal access - this isn't that great for proper coastal users that are heading down the rocks and cliffs yr round. The road tracks are poor, not maintained or improved, parishes don't look after them. Ronez and back of reclamation reefs (dogs nest) remain out of bounds to anglers. Ronez is some of the deepest waters on island which offers different species of fish. Dogsnest reef offers good bass, wrasse, mullet and conger fishing but has been out of bounds short term for about ten yrs! Will we get access to these venues soon? How will coastal access be improved to these venues, because I'm just seeing words without substance? What are the actions here? And over the yrs no one ever answers these questions or even cover them properly, so are all comments even read, considered, analysed? Does this project understand the coastal access shortfalls now? I'm not sure it does.	No	This will be addressed by under action RT3a that states the need to maintain and improve access where necessary.
JMSP-560787609	Seabed protection	No take zones - portelet an area that offers shelter, with pre closure having many anglers on either side of the bay on rocks down the cliffs. Was a nice safe venue in conger competitions (where fish are now all released) Can a no take zone and any in future please keep catch and release fishing available. Anglers have been doing good things for a long time and you are penalising us. Understand that we care because it feels like you	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. Catch and release will not be considered in

		<p>don't get that. We are ahead of the game for many yrs and have been an example in uk parliament. It's a joke adding restrictions when we have been doing a great job for a long time and a poor reflection on your thoughts towards the island community.</p> <p>The waters are protected and unprotected by the weather conditions, swells, massive tidal range. Is this taken into account? Seaweed gets ripped off every autumn winter, sand banks shift, fish and wildlife impacted etc... Feels like a text book job. 30% for 100% and anything else is a bonus that will make us look better on paper.</p> <p>The marine environment is likely already protected for more than 30% of the time, particularly taking into account many areas are not utilised.</p>		No Take Zones as it is not possible to enforce. Catch and release is also a highly stressful event for the fish that are caught and is therefore not conducive to an area that is a sanctuary for marine life.
JMSP-560787609	Fishing restrictions	<p>Local knowledge - just adding this in. Fishing fleet is depleted, those left understand. Let them harvest scallops, it's like turning the soil in farming and it helps our economy and helps produce new scallops. it is sustainable. Just don't let it happen in new areas. I'm currently exploring bait sales for scallop frill to reduce waste too and in turn reduce use of imported baits. I'm also 7yrs into running catch and release bass fishing competitions and my format is utilised overseas. I'm also just one person and have had other islanders support.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-560787609	MSP	<p>The MSP document is very long. Can you produce better summarised documents and updates?</p> <p>the attitude and undermining towards knowledgeable islanders/industries is not good. More dictators to impact on heritage is not what we need.</p> <p>MSP has some good intentions but I hope feedback is taken seriously as the island has been doing good things for many yrs and it feels like a telling off at times and an over the top forceful attitude from people not understanding islanders values, heritage and practices.</p>	No	The JSMP has sought information and advice from many different sectors and has been shaped by people who live and work in Jersey. It is designed to balance the needs of the variety of users in the marine environment.

JMSP-561260201	Renewable energy	Please build a windfarm. The majority of islanders do not care about the fact they might be an eye sore, 12 miles out they'll look like toothpicks anyway. We need to be a self sufficient island.	No	Outside of scope of the JMSP - the JMSP does not go into the detail of a windfarm as Jersey is only in the early stages of investigating a windfarm following the approval of the proposal to the States (P82-2023). Local stakeholder and neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."
JMSP-561496290	Seabed protection	I feel we need to protect the environment, particularly the marine environment. I do not agree with the talked of Wind Farm, why not look at tidal energy? I also think this is too complicated with action points etc etc. I'm a pensioner, I don't have documents to upload, just my opinion.	No	This will be addressed by priority IT5.
JMSP-561533274	Brexit	I don't understand when we had the opportunity to protect our waters after Brexit and only allow local boats within 6 miles, we did not take this opportunity. We need to protect our seas and our fisherman equally.	No	Outside of scope of the JMSP
JMSP-562567770	Conservation	I support the marine spatial plan in its aim to protect and nurture the marine life in our surrounding seas to encourage a healthy diversity and try to redress the balance of damage done over the last few decades.	No	General comment of support.

JMSP-562590364	Seabed protection	I would agree to more coastal areas to be a non fishing ie At Portlet bay , Bouley bay & the hand dived scallops . A total ban on mobile fishing gear .	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-562629729	MSP	How much will Blue Marine be paid by Government of Jersey as this is Blue Marines main objective?	No	The JMSP has had input from many different sectors, none of which have been paid to do so.
JMSP-562649831	Conservation	Those who cry that we "must protect our fisherman" need a lesson in ecology. Fishermen aren't going to save the planet, nor can any method they use to kill marine life save the planet. I understand it might be a sad ending for those in the industry, but in changing times it's about time we changed. There is a long line of industries which have faced out and been replaced by novel ideas, and fishing (amongst others) is one of them. There is no such thing as sustainable fishing, like there's no such thing as sustainable deforestation. Every part of our water should become marine protected zones for wildlife and plantlife. Like the deteriorating business of dairy farming, fishermen should be supported to change the industry to adapt	No	This will primarily be addressed through Marine Economic Framework work and through a business Impact Assessment that will accompany the final JMSP. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>to newer interests, namely the plant-based revolution which (ignoring heavily processed foods, which are also accompanied in animal products) is better for human health and ecology. It's also morally better. And so with any public consultations in regard to betterment of the planet/ocean (in turn, the betterment of biodiversity and humans) the consultation is a moral one.</p> <p>Fishermen should be supported to slowly(ish) but surely transform their work where once they took things from the ocean and one day, instead, they give back to it. The government should continue to be courageous and ignore the cries of ignorant and furious Facebook scrolled, and they should put in place evidence-based change. It's already making progress with transport infrastructure, despite those who cry for speeds to be unrestricted, and for roads and paths in town to be vehicle-dominated. The government should multiply this ethos into other areas, such as agriculture and biodiversity.</p>		
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JMSP-562663109	Seabed protection	Your plan is to implement a protective zone around the island, but all are inshore coastal. Majority of the fish species that thrive in our waters are migratory species. What use is protecting the inshore waters if the species that would thrive there would never get there in the first place. There are little to no protective sea beds offshore to allow a safe route for migrating species to reach out shores.	Yes	The MPA boundaries that have been recommended are primarily to protect sensitive and/or biodiverse habitat that, if maintained in a good state, will be beneficial to many species, including migratory species. Migratory routes of marine species are not well understood and we currently are unable to suggest locations for protection corridors. An action has been added (NB5c) to highlight the need to better understand migratory patterns of fish.
JMSP-562681429	Conservation	I opened this plan with some trepidation after watching the recent campaigns by Blue Marine and the Societe Jersiaise to push for the most extreme restrictions in some of the islands bays. Instead I am pleasantly surprised to find the report is balanced and supported by substantive evidence in all aspects. Thank you for presenting these factual recommendations with clear data backing the proposals.	No	General comment of support.
JMSP-562969701	Conservation	If this is really for true protection of our marine environment than I support it wholeheartedly I hope it goes far enough! Also that you have involved the people that need to be involved!	No	General comment of support.

JMSP-563019619	Commercial fishing	you must stop focal point netting of the gutters. the marine gutters act as high way for fish to come into out of bays or areas.. Netting across these gutter is done by commercial fisherman until they catch drops to 0.... these gutters should not be used as focal point fishing which the commercials know that is where the fish travel through.. one year in st Ouens commercials netted focal point for 2 weeks straight. All the birds left and no one caught a fish from beach, SUP, Sit on Top or boat for 4 months..Please stop the commercials from focal point netting of the gutters	Yes	An additional sentence has been added in 9.5.2. and priority FA2 already covers this as the 'gutters' are in Marine Protected Areas.
JMSP-563142399	Conservation	Stop large boats dredging up our sea bed and destroying the habitat. Had diving is better for scallops! Do not penalize small recreational fishing boats, people or our fishing fleet unless the are dredging as the dead bicatch will Be dumped! AIS engines and policing	No	This will be addressed by priorities NB4 and FA5 to promote more sustainable fishing methods.
JMSP-563594217	Conservation	I think this is a great initiative and Jersey should be doing everything they can to promote sustainable practices, in particular, sustainable fishing. Being an island, with definitive boundaries for our waters, we should be doing as much as possible to protect it. I would also like to see greater protection on land which would directly effect our waters and marine life. For example, more secure bins in coastal areas (during summer there are some areas with overflowing bins which leads to rubbish making its way onto beaches and into the water) and greater measures taken in harbours and ports to collect rubbish (using devices like the "Seabin" in harbours around St Helier). Although it doesn't strictly fall into the Spatial Plan, I think Jersey needs to consider factors like banning sun creams that contain harmful chemicals to marine life. This has been done in many areas of the world already where marine life is profoundly suffering. Jersey could add themselves to this list of nations and along with the Marine Spatial Plan we could put ourselves on the map as a sustainable island making big environment changes.	No	General comment of support. The JMSP does not go into specific methods of reducing rubbish in marine areas but the Seaside code and beach warden recommended in action RT6a is designed to improve awareness and respect for the marine environment. Suncream pollution is outside of scope of the JMSP and is to be guided by the UK.

JMSP-563908323	Conservation	Protection of the marine life is a great way to proceed , e.g. fences to protect the puffins. This and other schemes could put Jersey in a good position environmentally globally. Sustainable fishing. Educating the public. Sone sort of bin to collecting floating rubbish in, say, town harbours.	No	General comment of support and mostly addressed by various priorities and actions in the JMSP. The JMSP does not go into specific methods of reducing rubbish in marine areas but the Seaside code and beach warden recommended in action RT6a is designed to improve awareness and respect for the marine environment.
JMSP-563997417	Seabed protection	Pleased to see that the consideration of new NTZs at Anne Port and Archirondel takes into account both the species present and the impact of existing fishing activities rather than succumbing to social media pressure. When future NTZs are proposed I think Catch and Release should also be considered as a potential alternative to a full NTZ	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. Catch and release will not be considered in No Take Zones as it is not possible to enforce. Catch and release is also a highly stressful event for the fish that are caught and is therefore not conducive to an area that is a sanctuary for marine life.
JMSP-564000982	Fisheries Management	Its not mentioned as a policy in the plan but think it would be great to see the v-notch program for lobsters and berried hens extended to Jersey to help protect and increase the lobster population	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.

JMSP-564005111	Seabed protection	Large pleasure cruisers dropping anchor at portelet must surely be causing damage to the seabed in the NTZ? Should anchoring here be restricted or seabed friendly moorings introduced to help the situation?	Yes	Action NB1a has been amended to include reference to monitoring the effects of anchors, and to make recommendations to reduce damage if necessary. Further, the priority RT2 to review multi-use bays and consider the segregation of water activities could be used as a vehicle to affect a change in the way boats visit this bay.
JMSP-564504373	Seabed protection	I think it needs to be ambitious. Now is the time to hit the 30 by 2030 framework. An incredible amount of work has clearly gone into the MSP and I think it should cover a minimum of 30% of the waters. Also I think the NTZ proposal of 0.08% is embarrassing and should be far greater. Although the fishing community will be impacted this is only in the short term, as the long term benefits will be great to them, it will also provide huge benefits to tourism, biodiversity, well being etc. I think we should be aiming at 5% for NTZ (p.138-139).	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.
JMSP-564504373	Beach management	I think there should be much more regulation on jet skis and they should not be permitted in many of our coastal areas especially ones that are popular for swimmers and children. They are enjoyed by a few but have a serious risk to many, plus the environmental damage. I am also in favour of more protection of measures that reduce the use of motorised vehicles in our waters, such as polluter pays taxes, with the taxes fed back to the CNR or the MSP. This is particularly for recreational ones that have increased in use recently and have a negative effect on biodiversity.	No	Jet skis fall under actions RT1a and RT2b which both aim to improve safety for water users. Investigating a polluter pays tax is outside of the scope of the JMSP.
JMSP-564504373	Conservation	Finally, I think we should be doing more to protect and grow our seagrass meadows. Thank you for doing this and good luck. Tom.	No	Protection of seagrass meadows falls under priority NB6.
JMSP-564793605	Seabed protection	I fully support the MPA proposal of 27% and target of 30%. Destructive fishing practices need to be prevented these areas	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

JMSP-565083160	Conservation	Keeping the natural environment safe and combatting climate change	No	There are multiple priorities relating to the protection of the marine environment, namely priorities NB1 to NB6.
JMSP-565287923	Conservation	Very supportive of the initiative	No	General comment of support.
JMSP-566862189	Conservation	With oceans warming and biodiversity shrinking we need to protect our waters	No	There are multiple priorities relating to the protection of the marine environment, namely priorities NB1 to NB6.
JMSP-567209427	Seabed protection	Following the experience of the negotiations of the granville bay treaty I'm afraid the MSP becomes an option to stop the french fishermen fishing in those shared fishing waters. For example the NTZ (chapter 6, page 24, 26) is not identified in position.	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.
JMSP-567492977	Seabed protection	92% of mpa allow mobile fission jerseys, proposing to have it all banned	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-567507896	Seabed protection	With reference to the extension of non mobile gear zones. I believe the concept is understandable but the time frame and extent are not fair to the commercial sector that have invested time and money into mobile gears. I understand that they can consider complying but only if the time frame or other devices were considered. What indeed is the rush. In many parts of the world similar issues arise and workable solutions which include a longer time frame and assistance to re	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>equip, a historic rights system allowing existing fishers to continue with no increase in effort until retirement but allow no others in , or simply the government buying out the mobile gear licences. All these devices are used elsewhere and if both parties are able to be flexible then aims of both maybe achieved but over a longer time frame.</p> <p>It is worth noting that I think scallop stocks may have increased substantially since the 1980s when very little local catches were made . Many stocks are cyclical often due to factors other than fishing pressure, scallops, cuttlefish, spidercrab and tuna are interesting examples where stocks have developed, Whelks , octopus,lobster are species where the reverse maybe true.</p>		
JMSP-567642497	Disturbance	<p>Tighter restrictions for walking your dog within the South-east coast ramsar site. Uncontrolled dogs being the main issue that chase birds.</p> <p>Perhaps designating certain beaches where dogs can be walked or dogs can be walked specifically off-lead.</p> <p>Also kite surfing/electric surfboarding in the south-east coast ramsar area close to the shoreline. This disturbs feeding shorebirds at low, rising and falling tides.</p>	No	This will be addressed by action RT5a.
JMSP-568271464	Seabed protection	Value and protect our marine environment much more carefully than you have previously- as our government it is your responsibility	No	This will be addressed by priorities NB1 to NB6

JMSP-568735565	Seabed protection	Chapter 8.6 and chapters 9.4 in huge support of the following chapters to support the marine life and ensure the waters around our islands are protected appropriately.	No	General comment of support.
JMSP-568852099	International Relations	The most important thing is to keep a constructive consultation with France in order to keep an environmentally friendly activity for the entire artisanal flotilla of Granville Bay (including the Jerseys)	No	Jersey will continue to work with neighbouring jurisdictions.
JMSP-569102502	Compensation	I have read the full consultation document. I think it is a very good document, well researched, well set out and well balanced. I fully support its aims and ambitions and wish to see it acted upon in its entirety. It is a very good starting point from which to further expand and develop in the future.	No	General comment of support.
JMSP-569102502	Seabed protection	In the longer term, I would wish to see a complete ban on trawling and dredging within Jersey's territorial waters, which would require a period of financial and other support for the fishers who would be impacted. However, as has been shown elsewhere, I believe this would ultimately be to their advantage in terms of catch quality and therefore value.	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-569141192	Seabed protection	I agree with that bottom trawling should be reduced for the purpose of seabed protection. I would urge you to go further and look at phasing bottom trawling out completely.	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-569241625	MSP	I have read the entire report cover to cover. On the whole I am in favour provided the report is kept to and the goalposts aren't moved. We all need to give a little to protect both the environment we lock and the nature that inhabits it.	No	General comment of support.

JMSP-569328080	Watersports	<p>I am a boat owner and have been using boats on the sea all my life. My concern is that the existing speed limits are not enforced adequately. Speed boats and Jet skis in St Aubins harbour and close to shore are a problem but this has now spread to the outer reefs and i see it a lot at the minquiers sand bank main pool. as i understand there is no speed limit other than around the main island. i think the 5knt limit needs to be extended to the sand banks for the safety of people and protection of wildlife.</p>	No	This will be addressed by priorities RT1 and RT2
JMSP-569835547	Seabed protection	<p>Bottom trawling is one of the most damaging practices that humans inflict on our oceans, destroying seabed ecosystems, overfishing and indiscriminately killing everything to harvest one particular species.</p> <p>Bottom trawling has an enormous climate impact too. Dragging nets along the seabed uses more fuel and produces four times more emissions than other types of fishing. It disturbs carbon-absorbing sediment and eradicates the marine plants and animals that take in carbon from the atmosphere.</p> <p>Oceans absorb a quarter of all the carbon dioxide that we produce, yet the practice of bottom trawling threatens to destroy this precious resource.</p> <p>Bottom trawling is rife in the most vulnerable places. Marine Protected Areas (MPAs), established to protect ocean diversity, are no longer refuges where fish can reproduce and thrive.</p> <p>Near coastlines, bottom trawling dramatically reduces available catch for small-scale fishers, using alternative, lower-impact gear. These smaller vessels make up the majority of Europe's fleet (almost 80%) and account for half the people employed in the fishing sector, but they just can't compete.</p> <p>Our leaders have committed to halting the climate and biodiversity crises by 2030 and set us on a path to net-zero and</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>nature recovery.</p> <p>As an islander I call upon our government to make good on these commitments by enforcing existing environmental laws, supporting those who will be impacted and protecting the ocean.</p>		
JMSP-569868057	Seabed protection	Sounds highly valuable for marine protection and human action management	No	General comment of support.
JMSP-569915322	Fishing restrictions	On top we need to have a method for avoid or remove ghost nets.	Yes	This will be addressed through action FA2c.
JMSP-569960826	Conservation	The environment needs to be protected and blue marine are amazing for actually making change rather than just talking about it	No	There are multiple priorities relating to the protection of the marine environment, namely priorities NB1 to NB6.

JMSP-570613861	Education	I also think that Jersey would benefit from higher levels of ocean literacy integrated into our education system, via comms campaigns & our tourism sector. It would be interesting to understand how ocean literate our community is - as it seems that although most islanders gain much enjoyment from our beaches & ocean activities, there is a general lack of understanding in terms of our influence on the ocean and the oceans influence on us. Our work with Plastic Free Jersey & Climate Conversations showed us a disconnect between ocean health & climate change. I've attached Pamela Buchan's report on Marine Citizenship.	Yes	A new priority (NB7) has been added regarding a Marine Environment Visitor Centre. Priority RT6 also addresses marine awareness.
JMSP-570765833	Seabed protection	Please stop all dredging. It is way too destructive.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-570767494	Watersports	Boats should not be allowed into Portlet bay. The supposed safe snorkling is unsafe due to ribs etc tearing in at pace. They should not be there at all. Paddleboards, Kayaks and canoes are OK as they can see a snorkel being near the water and slow. An accident is waiting to happen. Ribs are as bad as jetskies for noise, danger, and disruption. They are also very polluting. I would like to see an outright ban on them. If not keep them away from our hopefully peaceful beaches and coastline please. They are the show off motorbikes of the sea.	No	This will be addressed by priorities RT1 and RT2

JMSP-570771888	Water quality	<p>I am very concerned that a toxic waste dump has been allowed pretty well within the supposedly protected Ramsar Site. Those who agreed to protect the site have not created much noise against the dump although they signed up to protect it from toxic waste!</p> <p>I would be grateful to know why they have allowed it to happen?</p>	No	Outside of scope of the JMSP
JMSP-571438799	Seabed protection	Fishing is my sport i want to see the maximim amount of protected areas i belive these sites should be high marine protected areas we must preserve our oceans	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.
JMSP-571620004	Economic development	<p>I attended two of the pubic meetings and it's clear that care needs to be taken to ensure that members of the commercial fishing fleet receive the same support and respect as members of the agricultural community. If Government fails to do this, negative press and public sentiment could derail what are otherwise very sensible and achievable goals. I believe there are three aspects to this. First, make it clear that the January 2024 end of the "consultation" period isn't the end of dialogue. It should be made clear to the wider public that the commercial fishing fleet continues to be engaged in discussions and data gathering in the Government's evidenced based strategy and planning. On that last point, the MSP in my view should be taken forward in conjunction with the Strategy for Sustainable Economic Development, also published by Government in October of 2023. Our "small island economy" has huge potential to be a pioneer in the development of sustainable fishing techniques and practices, invention and trialing of new technologies, and leadership in aquaculture and other</p>	Yes	Support for the fishing industry will continue to be addressed through the marine economic framework and a Business Impact Assessment will be carried out on the final Marine Protected Area boundary. Promoting sustainable fishing will be addressed by actions FA5a and b. The need for continued dialogue with marine stakeholders has been added to 3.3.4 and to figure 3a. Engagement with the fishing fleet on fisheries management strategy will continue.

		commercial uses of the sea in sustainable ways if Government is bold and seizes this opportunity now. A maritime technical park on the site of La Folie and possibly Commercial Buildings would be an ambitious statement of intent in this regard, with public-private partnerships a natural way to attract investment from many of the entrepreneurs to which the SSED refers, and would bring together two of the most important Government objectives in shaping Jersey's future.		
JMSP-571620004	Seabed protection	Second, the potential for a phased approach (with gradual designation of MPAs and NTZs year-on-year, rather than moving from a headline-grabbing 6% to 27% on a single date) - while achieving the ultimate goals of environmental protection more slowly than might otherwise have been hoped - is likely to be received sympathetically by the majority of islanders as a practical way to transition to more sustainable use of our waters in a way that enables the fishing fleet to adapt to change over a period of time. Third, clarity on financial support for the fishing fleet needs to be calculated, documented, and publicised. I have no vested interest here; it's simply the right thing to do; consistent with what Jersey's and other Governments do in relation to agriculture, for example, and therefore providing equal treatment and financial sustainability to those affected by change; and something which if costed and built into future public spending budgets can - with appropriate innovation and foresight - be self-funded in the longer term.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. Support for the fishing industry will continue to be addressed through the marine economic framework and a Business Impact Assessment will be carried out on the final Marine Protected Area boundary.
JMSP-572405543	Disturbance	I would like to highlight a few points that have effected Wading birds and Geese over the past 20 years . Dog walkers are by far the worst problem on many of our beaches i.e. Gorey Harbour to Green Island and West Park to St Aubins Harbour .These areas which are important to feeding waders .Also it seems to attract the most dog walkers .When off the leads many of the dog owners allow there dogs to chase the birds ,some even encouraging them by throwing a ball towards the feeding birds .There needs to be a law to stop this sort of behaviour and some one that can police the beaches .The number of dogs are on the increase and the birds are on the	No	This will be addressed by priorities RT7, RT5 and RT6.

		<p>decrease .The problem is not only during daylight hours as nowadays many dog walkers walk with bright torches during the night so there is far more disturbance than even 5 years ago .</p> <p>Another point of disturbance is the growing numbers on Kite surfers and powered surf boards that skim along the edge of the tide in all weathers ,again they have no idea the damage they are causing to the natural environment .</p> <p>The fact that they plough through flocks of geese shows the complete disregard for nature .</p> <p>Canoes are also becoming more of a problem as areas where Wading birds roost on high tides and breed in the summer are also being disturbed .</p> <p>Fisherman are also now fishing in new areas which have been traditional roosting rocks for waders at high tide i.e. Petite Port .</p> <p>If laws are brought in to protect the natural environment they will need to be some sort of policing .</p>		
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JMSP-572410633	Seabed protection	<p>An increasing protected areas can only be of benefit.</p> <p>I regularly see damage from trawling on my dives close to Jersey's coast. This resembles a ploughed field. Totally barren. Everything gone</p> <p>The devastation is 100% and is not far out at all, eg just out from St Brelade's bay. Surely this is within a protected area?</p> <p>Can more be done to monitor trawlers?</p>	No	<p>Monitoring the activities of trawlers and dredgers is not within the scope of the JMSP but is being addressed through fisheries regulations and iVMS (inshore Vessel Monitoring System) that will be going live on all Jersey fishing vessels in 2024 to assist in the enforcement of fishing regulations. Currently fishing vessels over 12m in length are already monitored using VMS, including French vessels, many of which are over 12m in length. French boats have VMS also.</p>
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JMSP-573002172	Conservation	Over the years I've seen a marked decline in the health of Jersey's waters. This is reversible with bold management and the JMSP is our best hope of doing so. As an ex-fisherman and a diver (who spent a large portion of his childhood poking around the rock-pools and beaches) I would like to see broader protection for the marine environment i.e. protection of whole ecosystems, rather than just certain individual species. 8.6 The use of MPA's, which allow less destructive methods of fishing, but are protected from mobile gear, seems to me to be the most practical way to protect large areas of sensitive ecosystems around such things as maerl, sandmason and seagrass.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-573006409	Seabed protection	9.7 Fishing with mobile gear destroys marine habitats and far more sea-life than is landed for consumption. Such methods would not be tolerated if they were visible, or on land. It is also extremely energy inefficient compared to static fishing methods.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

JMSP-573007929	Disturbance	11.2.3 The constant visits of tourist RIB's are a persistent disturbance to wildlife, particularly the birds and seals on the outlying reefs.	No	This will be addressed by priority RT7.
JMSP-573356557	Seabed protection	<p>I believe that the JMSP's recommendations accurately reflect relevant domestic and international responsibilities, particularly with regard to the Global Biodiversity Framework (GBF) and its aim to see 30 per cent MPA coverage by 2030 (30x30). Noting that the JMSP proposes to designate 27 per cent of Jersey's waters as MPAs, while also identifying areas where further research should be targeted in order to achieve the full 30 per cent of protection. The delivery of this would result in a significant step in Jersey's journey to fulfilling its international obligation to the GBF, and it is therefore essential that priorities NB5 and FA1 should be a significant part of the final JMSP.</p> <p>It is apparent that the JMSP has applied an evidence-based, methodical approach to determining the location, extent and level of protection to be afforded by the proposed MPAs. Protection of the proposed areas should result in recovery and growth of nationally important habitats that also serve as important nursery, spawning and feeding grounds; leading to anticipated increases in biodiversity and resilience to storms and climate change. The increase in biodiversity that should result from MPA implementation should also benefit the local fishing industry, through increased abundance of commercially important fish populations. My belief is that the climate, biodiversity, fishery, economic and social benefits associated with the proposed MPAs will more than outweigh the economic cost of lost fishing from local dredging and trawling activities. I therefore strongly support the proposed network of MPAs and stress the fundamental importance of Priority NB5 and its associated actions. In addition, it is important that compensatory measures are put in place for fishers who may be</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>adversely affected by any MPA designations. I suggest that this is included as an additional action. If Jersey is to meet its 30x30 commitments, it is essential that NB5a and NB5b are implemented.</p> <p>I support the MPA proposals as outlined in Fishing zone B, as this will result in 27.22 per cent of territorial waters being closed to mobile fishing activities (trawling and dredging). However, because of the destructive nature of dredging and bottom trawling, I cannot support the continuation of these activities in the remainder of Jersey's waters in the long term and suggest that they are phased out as soon as practically possible, whilst avoiding adverse impacts on local fishers.</p>		
JMSP-573356557	Conservation	I fully support Priority NB6 and believe the proposed actions are appropriate to aid the protection of seagrass habitats in Jersey waters. This should encourage the natural growth of seagrass and could potentially lead to the expansion of existing beds. Such actions could help to boost local biodiversity and mitigate the potential impacts of climate change.	No	General comment of support.
JMSP-573356557	Economic development	In as much as Priority FA5 proposes the development of marketing strategies, creating sustainability stamps and providing relevant infrastructure to increase catch quality and efficiency in processing, I am fully supportive. However, I believe that further actions are needed to reduce the overall environmental impact of the commercial fishing. This could be in the form of: transitioning away from the use of damaging fishing gears such as trawling and dredging, perhaps through economic support; providing economic support to fishermen to undertake lower impact forms of fishing (such as scallop diving); and trialling methods to reduce carbon emissions.	No	This will be addressed by priority FA5. Further economic support will be addressed through the Marine Economy Framework.
JMSP-573356557	Seabed protection	In as much as Priority FA5 proposes the development of marketing strategies, creating sustainability stamps and providing relevant infrastructure to increase catch quality and efficiency in processing, I am fully supportive. However, I believe that further actions are needed to reduce the overall environmental impact of the commercial fishing. This could be	No	Recommendation FA5 is aimed at supporting sustainable fishing methods which will help to incentivise more sustainable fishing practices.

		in the form of: transitioning away from the use of damaging fishing gears such as trawling and dredging, perhaps through economic support; providing economic support to fishermen to undertake lower impact forms of fishing (such as scallop diving); and trialling methods to reduce carbon emissions.		
JMSP-574950585	Seabed protection	Je suis pêcheur à Granville. Je suis contre ce projet JMSP car vous nous avez déjà emputé certaines zones marines et vos îles sont un abris en cas de mauvais temps. Et si les seuls bateaux français qui peuvent y accéder ne peuvent plus y aller cela devient un vrai problème car nous n'avons pas assez de ressources dans les eaux françaises pour accueillir tout le monde.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-575652669	SSIs	8.4.1 - La Marmotiere and Maitre Ile at the Ecrehous are also SSIs, but for Historical and Architectural reasons (and Maitre Ile also for Archeological reasons), so I assume this isn't relevant here?	No	Not relevant in the context of the chapter.
JMSP-575652669	Conservation	8.5.1 - Page 90 - There are as yet no ASPs protecting Marine Mammals at the Ecrehous, but I believe there are plans for one. Which leads to Priority NB4 - any ASP for seal haul out areas needs to be discussed with residents as there is a navigation channel (which has been much used by Jersey and French sailors for many years, before the seals came) close to the main haul out site.	Yes	This will be addressed by priority NB4 but consideration to current users, residents and operators had been highlighted in section 8.5.5 and in action NB4a.
JMSP-575664528	Management	Priority RT7 - management plans for offshore reefs. I have my doubts about the practicality and effectiveness of a warden as visitors arrive by the dozen, landing in different places and then scatter in all directions, but presumably these ideas will be consulted upon in due course.	No	This will be addressed by priority RT7, details of role are outside of scope of the JMSP.

JMSP-575664528	Watersports	11.1.1 - Para 3 - minor point, but it seems a bit of an exaggeration to say that there is a 'concentration of watersports' at the Ecrehous. Apart from people arriving on boats (and very occasionally by jetski), there is a limited amount of kayaking and paddleboarding. There are no motorised watersports such as jet skiing or water skiing etc.	Yes	Text amended to boating rather than watersports, as there have been multiple comments during the consultation about increasing use of the reefs.
JMSP-575674749	Management	12.8.3/Priority IT6d - Proposed actions re moorings outside harbours. I believe that the relevant boating associations should be included in discussions about these; moorings just outside some of the outlying harbours have been held for several generations.	No	Outside of scope of the JMSP.
JMSP-575676246	Amendments	Appendix A: NB2 should include the Jersey Ramsar Management Authority as one of the responsible parties. NB4a should include Ecrehous Residents Association as one of the responsible parties (or at least noted that they should be consulted, given that residents have the best knowledge of the reef) CH4 - note that at the Ecrehous Maitre Ile and La Marmotiere were designated SSIs in early 2018 for architectural and historical reasons ie there is already some protection in place. RT7 should include the Jersey Ramsar Management Authority as one of the responsible parties.	Yes	Appendix A has been amended for priorities and actions NB2, NB4a and RT17 as suggested. Parts of the reefs are designated as Listed Places and/or Listed Buildings, rather than SSIs.
JMSP-575678093	MSP	I've made some minor comments on various chapters separately, but, having read the whole JMSP, I just wanted to say that it is a hugely impressive piece of work (thorough and balanced), so well done to all involved! There is nothing to fundamentally disagree with, and presumably detailed proposals about the various priority actions will be consulted upon in more detail where appropriate in due course...	No	General comment of support. Many of the priorities and actions will require further consultation before they can be implemented through policy or legislation.

JMSP-576040518	Seabed protection	I support the plan to support and increase biodiversity	No	General comment of support.
JMSP-576092520	Seabed protection	I support extending the protected area around the island.	No	General comment of support.
JMSP-576158055	Seabed protection	We need to do much more to understand our marine environment and measure/monitor marine biodiversity. The tools exist to do this and the proposed protection under this plan should be supported.	Yes	General comment of support.
JMSP-576158055	Compensation	At the same time we should support our fishing industry and offer grants to fishers who are disadvantaged, I believe in the agricultural sector the island is pretty good at this. We need very clear mechanisms of support for what is an extremely important industry for the island. The MSP does not set this out properly and I'd like to see that our fishers are well looked after and shown the respect they deserve.	No	This will primarily be addressed through Marine Economic Framework work and through a business Impact Assessment that will accompany the final JMSP.
JMSP-576464942	Fishing restrictions	I started fishing as a young boy, because my father was a fisherman, and became completely passionate about it and when I left school at 15 I went straight into the industry, where I	No	The proposed MPA boundaries do not affect static fisheries, only the additional suggested NTZ at Les Sauvages would restrict static fishing. There is a

		<p>have remained until today (age [REDACTED]) and intend to stay until retirement.</p> <p>I started fishing with nets and lines for wet fish then progressed up to a bigger boat fishing for lobster and crab. After many years I then decided to go back to west fish, bass, bream and mackerel so everything now is invested into that type of fisheries. I have a nice little local market for the fresh fish that I catch and fish to order, with all my catch staying on the island. This means it has a very low carbon footprint compared to importing fish from other countries.</p> <p>I am concerned that the Marine Spatial Plan will push me out of the areas that I need to fish because my boat is too small to fish in deep waters and I do everything by hand without any hydraulic equipment. It is a very sustainable way of fishing and would be impossible to do in any other way e.g. I couldn't pull my nets in deeper water as it would become dangerous due to the strong tides in Jersey waters,</p> <p>It would be very upsetting to see the fishing industry disappear or be restricted to the extent that it was no longer viable as an industry. My son [REDACTED] also shares my passion for fishing and it would be a shame to see the younger generation not to have the same chances.</p>		<p>recommendation to review netting within the MPA network but this is primarily for safety of other water users and for the protection of specific marine fauna, such as diving birds. And there is a further action (FA2e) to review commercial static fishing in proximity to angling spots. Any future restrictions on potting will require further consultation with the relevant stakeholders.</p>
JMSP-576889245	Beach management	I am concerned that beach goers are ignorant of the wildlife protection laws that are in place. There should be more protection of wading birds from being chased by dogs.	Yes	Beach warden scheme has been added to action RT6a.
JMSP-576889245	Beach management	Botanical species should not be removed from the beach. Stones that are turned over should be replaced.	No	This will be addressed by current aquatic resources law and will not be addressed through the JMSP.

JMSP-577689274	Fisheries Management	9: in the uk it is illegal to fish for crabs and lobsters with eggs, which they carry for a year, so why do we allow it here. I have contacted the Environmental minister but had no response; I have had support and matched concerns from Marine Conservation. It is in our interest to stop this practice and allow the crabs and lobsters to reproduce and thrive, they are also part of island life. Some areas of the UK have hatching centres; we have no such thing and are selfishly taking the future species just for profit.	No	Outside of scope of the JMSP. This is a complex topic but it will be addressd through fisheries management measures where appropriate.
JMSP-578041530	Fishing restrictions	I would like to see an extension of the bass ban from 1st January until 31st April. Bass are fully rowed up in January and often haven't spawned when the ban is lifted.	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.
JMSP-578041530	Fisheries Management	I would like to see more policing and a better reporting scheme for people who place nets and pots within the harbour areas. A more joined up approach between ports of jersey and fisheries and even a report email you can notify illegal fishing on. After reading the report I was shocked by the landing totals for wrasse, this is one of our slowest growing species which has very little commercial value. It seems terrible to see these being netting just for pot bait. This is one of the scenarios where because it's not a popular species like Bass everyone turns a blind eye. Surely we have a duty to look after stocks of all species, not just those with a commercial value. I would also like to see a study of how the apparent increase in	Yes	Partly addressed by under FA2. Consider a new recommendation to review commercial potting and netting within proximity of angling spots. Seal study is outside the scope of the JMSP.

		seals,dolphins and tuna inshore could be effecting stocks of other species such as mackerel, garfish and mullet.		
JMSP-578044314	Fishing restrictions	<p>9.4.3, I'm a 15 year old student who does fishing as much as I can. If that's to relieve exam stress or just have a nice day out. It's a big part of my life and has also been a big part of many of my families life going back generations, After these initial proposed restrictions it will continue to get worse which would not only cause more young people lurking around town with nothing to do but also forget our history and culture. I love fishing on st Catherine's breakwater [REDACTED] and as I'm sure you know people lives over here are sea angling and they wouldn't trade it for anything in the world, the restrictions will only create negative tensions and in regards to fishing zone B 'provide the greatest benefit from nature' when talking about the coast which is included in it, from the perspective of fish the places to restrict to provide the greatest benefit for them is where they migrate as huge populations travel through their in dense packs. This is also where the Jersey government have given permission to French trawlers to tear up the sea bed. Evidence of this which is a primary source I have witnessed is in spring when I free five for spider crabs when they migrate to shallow water to breed. depending on if they were intercepted by French net also depends if there's finite amounts of them or massive amounts, for example last year I went once and saw 100's, it was incredible. Year before nothing, this was the same for others. Yet still a recreational angler taking two if the 100 crabs in a small area leaves little to no affect. As for fish nurseries and fish populations in general recreational anglers also have little to no affect on. I like many others feel this whole proposal has been rushed and will target the wrong people. I love and care for the environment. I'm almost always catch and release unless it's crab or the fish is unable to swim back after being caught due to things like being gutted hooked. I go to popular fishing areas on big tides and clear up lost gear but this proposal I personally feel is the wrong way to go about it</p>	No	The MSP does not suggest restrictions on angling inshore (apart from the already established NTZ at Portelet). The Sauvages NTZ recommendation is offshore and will not affect inshore anglers. With an increasing population and increasing interest in shore angling, conservation measures are needed to ensure the sustainability of this sector.

JMSP-578974490	Fishing restrictions	recreational fishing should not be withdrawn for anyone.All these changes to the use of our beaches and coastal waters have only occurred since the crown gave up the rights and gave them to the PEOPLE OF JERSEY.	No	With an increasing population and increasing interest in shore angling, conservation measures are needed to ensure the sustainability of fishing in Jersey waters.
JMSP-579215402	MSP	Please do all you can to protect our marine ecosystems which are so valuable to both locals and the tourist economy!	No	This is will be addressed primarily under priorities NB3 to NB6.

JMSP-579611228	Seabed protection	<p>Apologies but I haven't managed to read the MSP so I hope this is relevant. I fully support making most, if not all, of Jersey a marine protect ed area. Although I enjoy my hobbies of spearfishing I would not be against a significant increase in no take zones as I understand the benefit of them. I am strongly against any forms of mobile gear including dredging or trawling and believe these should be banned outright in Jersey waters. The fisheries department needs more funding to ensure an adequate level of enforcement for recreational and commercial fishing as I feel it is not as efficient as it could be. I have invested a lot of money into fishing nets, however I would not be against that being more heavily regulated and monitored.</p> <p>Basically, please ban all mobile gear in Jersey waters and please make more No Take Zones and of a greater area. I will support anything as such to support healthy oceans and improve the biodiversity and protection of Jersey waters.</p>	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-579620445	Fishing restrictions	I feel this has been sprung upon the fishing community without proper consultation or scientific data. To propose a ban on mobile gear prior to consultation only highlights the contempt shown. I sincerely hope this defeated! A lot more work is needed before you can justify impeding honest fisherman making a living that provides fresh seafood daily for the population. Amen	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-579867638	Fisheries Management	This also includes chapters 8 & 11. We share the waters with the commercial fleet, but where we speedily adopt good practice that can help sustain our fish stocks the fleet drag there feet. It took many years to get agreement to put the Bass size up to allow most to breed once, but the size still needs to go up to allow them all to breed. The close season also needs to be extended till the end of April so Bass can finish their breeding cycle. Lobster is another example, its agreed that the size needs	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.

		to go up to improve the stock level, but the JFA who are subsidised & mostly very well off fisherman say that it will be too costly to take the proper immediate action advised by Marine Resources. I think that the Jersey fleet is the only one in the UK & possibly Europe that still keeps lobsters with eggs, the proof is out there that is one of the best ways to improve stocks, but the JFA have constantly fought or found ways to delay bringing in regulations on this. Many recreational low water fishermen already put berried females back, sometimes knowing the chances are a professional fisherman will catch it within the next few days, this an area where sharing the same space hurts.		
JMSP-579867638	Fisheries Management	Fishing gear inside harbour areas has been highlighted as an issue, currently there is a lobster pot buoy within 30m of the steps at St Catherine's, this makes angling nearly impossible in this area, you either snag the buoy or the string of pots laid out on the bottom. Bouley bay & St Catherine's bay have both had gillnets shot out through the moorings in the past, not only is impossible to catch fish next to a gill net there is the added danger of killing inshore diving birds, or far worse tangling & drowning a swimmer or diver.	Yes	This will be addressed by priorities FA2 and RT6. Also, new actions (FA2b, FA2e and FA2f) have been added regarding potting and netting.
JMSP-579867638	Watersports	Small water craft such as Kayak's & SUP's have room to navigate around anglers fishing from piers & rocks, but there are some who won't give anglers space, they are on the shore & unable to move far, where water craft can give them a wide berth without any difficulty. A code of practice would be nice to see.	No	This will be addressed by priorities RT1 and RT2.
JMSP-580249618	Fishing restrictions	To increase the bass fishing closed season to include the month of April. This will allow spawning Bass an extra month to drop their eggs. These fish still need all the help they can	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.
JMSP-580259555	Fishing restrictions	More controls should be in place to keep our fishermen in business and stop large foreign boats dredging the sea bed.	No	Outside of scope of the JMSP. Support for fishermen is being addressed through the Marine Economic Framework.

JMSP-580259555	Education	Recreation and knowledge of the Coast should be encouraged especially in schools.	Yes	A new priority (NB7) has been added regarding a Marine Environment Visitor Centre Priority RT6 also addresses marine awareness.
JMSP-580259555	Watersports	Controls are needed for jet skis ..a license....they should be only allowed in certain areas well away from beaches. Speed boats a Nono too.	No	This will be addressed by priorities RT1 and RT2
JMSP-580259555	Renewable energy	With the massive tidal range we have ,it makes sense to use the power for energy. With simple VERY careful construction in a sensible area, would be more in line than wind power. Subsidies for every homeowner to have solar panels would help too. New builds should have reservoirs built under the homes for water conservation, and less run off into the sea.	No	This will be addressed by priority IT5.
JMSP-580302924	MSP	i was so disappointed an amendment removed the marine protection to the Bridging Island plan i fully support the MSP mental and physical health and well-being and direct and indirect international food chain in the face of a global ecology emergency	No	General comment of support.
JMSP-580344633	Climate	By the end of this century according to global top predictions the climate will have got hotter by about 3 degrees Celsius on average causing much of the polar ice to melt causing much of Jersey and coastal Europe to be covered by rising sea levels so we need to stop building houses on coastal wetlands of high biodiversity and only build in Jersey away from the coastal floodplains. Also we need to promote Jersey to the 500,000 tourists who visit Jersey each year as one of the richest places ecologically in Europe with Europe`s biggest resident Bottle-nosed Dolphin population and big numbers or fairly rare seabirds breeding and visiting Jersey waters which can attract huge number of niche marketed ecology tourists who love Jersey for its abundance in ecology attracting already growing numbers of ecotourists. Jersey needs a diverse economy growing ecotourism with finance side by side as finance will soon fold due to a nearing global recession.	No	Outside of scope of the JMSP

JMSP-580439736	Seabed protection	<p>I am a commercial fisherman with over 30 years of involvement in the industry.</p> <p>I have been involved heavily in bass fishing, lobster and crab potting. I have seen a huge decline in all these key species- in order to take the pressure off these species, and enable me to continue fishing- I have now diversified and heavily invested into a scallop boat.</p> <p>I have always fished using the most conservative methods where possible, opting for rod and line, lines, and my pots- all having escape gaps fitted.</p> <p>I fully support a MSP, I do NOT however support the HMPA we seem to have been dealt ! Our sea beds are not decimated and this high level park is simply un-necessary and the designated areas are 100 % uneconomical for our small fleet of day boats that use mobile gear to continue in the industry.</p> <p>I have borrowed money to buy the boat, I am extremely fearful that should the MSP get passed with the chart as it has been presented to me- I will not be able to continue fishing with my boat and it will drive me to bankruptcy as I still have a minimum of 5 years left of repayments ! Over 80% of the areas I worked in last year are inside the proposed MSP.</p> <p>If you move us from ground that has been historically fished for many generations into further away areas- this just increases carbon footprint and puts our small day boats and crews in danger, as we are simply not big enough to compete offshore alongside French ships !</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-580498991	Seabed protection	<p>I have been a scallop diver for around 7/8 years and been in and around the sea all my life, I have witnessed the damage the bottom trawlers cause to sea bed and all marine animals they come across. It is definitely a positive any bans that come in as you can see the difference on areas like the ecrehose where bans have previously been put in. To get the dredgers banned in as many areas as possible as it is the most destructive form of fishing possible.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

JMSP-580518987	Fishing restrictions	I feel to the proposal to include more restrictions on the areas where recreational fishing is allowed (south coast etc) is misguided. Compared to the impact commercial fishing vessels have , recreational fisherman have a barely significant impact on the fish stocks around the island . This is the equivalent of banning wooden tooth pics world wide in order to stop the impact of deforestation.	No	The MSP does not suggest restrictions on angling inshore (apart from the already established NTZ at Portelet). The Sauvages NTZ recommendation is offshore and will not affect inshore anglers. With an increasing population and increasing interest in shore angling, conservation measures are needed to ensure the sustainability of this sector.
JMSP-580875611	Seabed protection	Chapter 8.6 outlines suitable actions to meet the targets of the Global Biodiversity Framework, where mobile fishing gear is not permitted to 27 percent of territorial waters. I want to see 30% of oceans protected by 2030. Thank you for your time, and for listening to my consultation response.	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-580889210	MSP	All of it - marine life needs to be protected	No	General comment of support.

JMSP-580924451	Fishing restrictions	<p>Pot & net free zone:</p> <p>An area is needed around the shore, around all the coast, to exclude nets and pots from obstructing recreational angling.. A distance of 200 metres from the low water mark would be adequate whilst not affecting the capture of such targets as are sought by the potter/netter. Such equipment placed too close to both sides of St catherines breakwater and are a major issue for anglers. Illegally placed gear is not removed after been reported within an acceptable time frame and even when removed is simply returned to the culprit with no sanctions This has been an ongoing issue for decades and is a major frustration when after walking all the way down to discover a pot marker-often more completely ruining a days fishing as often the only place left, is not occupied simply due the markers been in the way! . An Increase from the 100m limit currently in force to 200m would help stop the creeping in of gear set. To offset the costly inconvenience to the Coastal Patrol it would be suggested that both confiscation and £500 fines should be imposed after the 2nd or 3rd offence or further breaches of the rule</p>	Yes	This will be addressed through a new action (FA2e) to review commercial potting and netting in proximity of angling spots.
JMSP-580924451	Fishing restrictions	<p>No Take Zones.</p> <p>Any relaxation of NTZ to allow C&R , would I submit allow recreational anglers the ability to Catch and Release. This would need to be strictly applied with no retention of damaged fish and stern financial fines for breaches of the rules or littering and it would become self policing as fishermen who intend to take any captures from a NTZ would run the risk of been reported by C&R anglers Ultimately, should it become necessary to expand the NTZs, less resistance would be encountered should C&R be permitted.</p>	no	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. Catch and release will not be considered in No Take Zones as it is not possible to enforce. Catch and release is also a highly stressful event for the fish that are caught and is therefore not conducive to an area that is a sanctuary for marine life.

JMSP-580924451	Research	<p>Wider Benefits of Recreational Angling</p> <p>A further study as to the actual benefits of recreational Angling should be commissioned .</p> <p>The last study was nearly a decade ago and the mindset of the vast majority of recreational anglers has now changed toward C&R ,with almost all competitions been run under C&R and from memory did not include areas of angling activity</p>	Yes	An extra sentence has been added to section 11.2.4 paragraph 3 stating that catch and release fishing has become more common in recent years, with most angling competitions using this method. There is also a new action to improve monitoring of recreational fishing (RT2d).
JMSP-580924451	Access	There is a priority in the Marine Spatial Plan to review the current system and there are concerns that this may limit or completely close access to recreational anglers on certain parts of the coast a or beaches.	No	This will be addressed by under action RT3a that states the need to maintain and improve access where necessary.
JMSP-580924451	Fishing	<p>Wrasse/ Common Eels</p> <p>It has long been recognised by the recreational angling community that Wrasse and common eels are slow to grow, long-lived and highly residential. Wrasse are targeted by gill nets as a readily available source of bait for pot bait which is nothing short of criminal and common eels have been decimated by fishermen selling to the local Asian market which is already illegal in the UK but due to the local fishery dept having little or no interest in this matter has been allowed to continue unabated.</p>	No	Outside of scope of the JMSP. This will need to be addressed through fisheries management measures.

JMSP-581064646	Conservation	<p>8. (pages 78 – 122) I support the whole plan but in particular it's benefit to the protecting the marine environment and maintaining and restoring its biodiversity. Not only for the benefit of the Island but it is important that Jersey fulfils its international obligations regarding conservation targets that have been set at a global level.</p> <p>6. (page 56) This is vitally important given the contribution that the marine environment can make in helping to address the world's climate emergency. Something we should all be concerned about, that's me, you, and everyone. For future generations sake we must do our utmost to address this now and not kick the can down the road.</p>	No	There are multiple priorities relating to the protection of the marine environment, namely priorities NB1 to NB6.
JMSP-581089255	Seabed protection	Fully support that the existing Ramsar Sites are given legal protection through MPA designation.	No	General comment of support.
JMSP-581089255	Beach management	<p>Fig 8C - Seabird activity</p> <p>Page 90 - Wading birds are present in a much wider larger area than shown on the map, especially in the south east where all the coastal area from St Helier eastwards to Gorey is important. Dogs cause an enormous amount of disturbance to the many bird species using the intertidal area, often with the owners totally unaware what damage the dog is doing. Sometimes, one can only come to the conclusion that the owner just does not care at all about anything else on the beach and that they have the automatic right to do whatever they want. Basically, just being totally selfish. This needs to change and much stronger</p>	Yes	This will be addressed by priority RT5 and an additional recommendation for a beach warden (RT6a) to help enforce any new regulations. A note has been added to the captions of maps 8b and 8c to highlight that they are based on the current available data.

		<p>action needs to be taken by the authorities in this regard. I consider that all dogs should be on a lead when on the beach. This means that they are under control and the owner knows where they are.</p> <p>2) Disturbance has increased substantially during the last 15 years in regard to the use of kayaks, kite surfing to name a few of these water leisure activities. This is particularly important along the south and east coasts where wader high tide roosts have been deliberately disturbed in order to take supposedly 'interesting' photographs. Brent Geese can easily be disturbed by jet skis in St Aubins Bay, whilst they are roosting on the sea, at high tide, in settled conditions. These are also the perfect conditions for jet skis.</p>		
JMSP-581089255	Fisheries Management	<p>3) Fish netting. Discarded, either deliberately or through lack of care, should be strongly dealt with. Legal action being implemented as promptly as possible, as should have been the case with the 13 European Shag that were found in a discarded net in St. Brelades Bay in 2022.</p>	Yes	This will be addressed through priority FA2. Also, new actions (FA2b, FA2e and FA2f) have been added regarding potting and netting.
JMSP-581089255	Beach management	<p>The inter tidal area in the south east corner of the island has been extensively changed over the last thirty years with an ever increasing area covered by aquaculture. This is to the detriment of the many migrant and wintering bird species that have had this area altered in such a way that it is now no longer available to them, together with the increased human and mechanical presence, due to the shellfish being actively farmed.</p>	No	This will be addressed by action FA3a to monitor and mitigate the impacts of aquaculture

JMSP-581127523	Seabed protection	Trawling should be restricted (if not banned) because it causes total devastation to wherever it is done and there is also bycatch. It should also be limited to local vessels	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581179017	Seabed protection	Sustainability is key to the longterm survival of the fishing industry and the habitat, marine life and beauty of our coastline and waters. I understand that times are hard for the fishing industry but sustainability of our waters is paramount to its long term viability. Protecting marine life, species and healthy waters is important and by restricting trawling and disturbing the natural way the seabed can replenish is vital.	No	This will be addressed by priority NB5.
JMSP-581240231	Seabed protection	<p>MPA's & FISHING ZONES (8 / 9)</p> <p>Agree fully with the proposals, although the definitions made in 9.4, for Lightly Regulated Zones, is TOO light in my view.</p> <p>We know from extensive scientific studies that bottom trawling is a highly damaging means of fishing due destruction of the seabed, causing only negative and long-terms degrading effect</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>on biodiversity and carbon sequestration.</p> <p>I would ask the government to significantly consider banning bottom trawling, dredging and mining in ALL Jersey waters - to ensure rapid and continued biodiversity development, allowing sustainable fishing to thrive for the future.</p> <p>Therefore for all Jersey waters to be a Fishing Zone B, C, or to redefine Zone A to prohibiting bottom trawling, dredging and mining.</p> <p>At Lyme Bay, following 15 years of protection from Bottom Trawling, they now have a 4-fold increase in Lobster population and 3.5 increase in Scallop population despite being able to continue these two fishing practices.</p> <p>Shallow trawling can continue to take place or other non-destructive means of fishing, that would benefit from:</p> <ul style="list-style-type: none"> - Higher number of fish from intact regenerated seabeds - Higher number of fish due to spillover effects from Zone C no take MPAs 		
JMSP-581240231	Seabed protection	<p>SEAGRASS PROTECTION:</p> <p>As a regular boater, I emphasise the importance of seagrass-friendly moorings and do not for one moment consider them as a limitation or impracticality over anchoring. Moorings also limit boat traffic in a particular bay and over-crowding</p> <p>For recreation, snorkelling off boats is much more rewarding if the seabed is undisturbed as well as line fishing</p> <p>Seagrass regeneration is also hugely important to helping Jersey reach carbon neutrality / net zero, in acting as an important carbon sink for Scope 1/2/3 carbon emissions from Jersey</p>	No	This will be addressed by priority NB6.
JMSP-581240231	Renewable energy	<p>WIND POWER</p> <p>Agree fully with proposal with following comment:</p> <ul style="list-style-type: none"> - Suggest investigating more closely the potential detrimental 	No	General comment of support. The JMSP does not go into detail about offshore wind or future monitoring of impacts.

		electro-magnetic effects on biodiversity and ensuring sufficient cable protection or burial in order to minimise this		
JMSP-581242263	Seabed protection	supporting the proposed extension to the Marine Protected Areas	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581243297	Seabed protection	<p>Jersey's marine environment is astonishing - we are incredibly lucky to have this natural playground on our doorstep. To match global targets of 30% protection by 2030, it's only right that we move into a modern approach to marine management.</p> <p>Scientific literature, as well as anecdotal reports (several divers have told me of the damage they're confronted with after a dredge or trawl has passed through an area) have shown society the impacts of dredging and trawling. Studies around the world, including in the matching temperate climate of the UK, have shown that such areas can have positive benefits for fisheries and biodiversity.</p> <p>Beyond these biodiversity impacts of closed areas, they are an important tool for mitigating the climate crisis - helping to improve species resilience to storm events (which we have already seen many times this winter) and helping to keep carbon within sediments by avoiding disturbance and re-suspension into the water column.</p> <p>We have the information we need, the only step remaining is action - to create areas safeguarded for nature recovery to protect our oceans for its inherent beauty and for our future generations.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581247389	Fishing restrictions	1) To maintain the freedom of recreational low-water fishermen to continue to fish on the occasional tide like many generations before	No	The MSP does not recommend restrictions on low water fishing inshore (apart from the already established NTZ at Portelet). The Sauvages NTZ recommendation is offshore and will not affect low water fishing. With an increasing population and increasing interest in low water fishing, conservation

				measures are needed now to ensure future generations of locals fishers can benefit from the same fishing spots as today.
JMSP-581247389	Seabed protection	2) to forbid dredging fishing boats in our waters.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511836	MSP	Whilst I recognise and favour the development of a MSP, the draft version presented has not addressed the needs of key stakeholders such as the fishing (and aquaculture) sectors. More time is needed to identify potential impacts to those sectors and determine what options and solutions could be available to mitigate any negative impacts.	No	Support for the fishing industry is being addressed through the Marine Economic Framework.

JMSP-581511836	Industry	<p>Moreover from what I witnessed having participated in nearly all of the available elements of the consultation process is that it has, at best, been biased and misleading which is likely to result in members of the general public, who don't have any depth to their understanding of the many facets surrounding this topic, believing this draft proposal is widely supported and without controversy. The reality is considerably different with a lack of a cohesive, balanced, independently verified and timely data and information being presented in general but especially in respect to requests from stakeholders which represent the local seafood supply chain. This has led to a situation wherein the potential impact that the current MSP would have on Jersey's fishing fleet neither being assessed nor given any importance.</p> <p>Lets hope the change in Minister brings about a more balanced approach that recognises and values both economic and environmental benefits that could be derived from our marine resources rather than just the environmental ones.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. A Business Impact Assessment will be carried out on the final proposed MPA boundaries.
JMSP-581511837	Watersports	<p>Can you please confirm if as part of the MSP it is proposed to extend the 5knt speed limits to the sandbanks when uncovered i.e. within 200m of waters edge similar to Jersey beaches.</p> <p>The recent significant increase in rib and jetski ownership in conjunction with popularity of visiting the outer reefs, Minquiers and Ecrehous and sea swimming means there are a lot of people using the same space.</p> <p>In recent years the flat water inside the reefs is desirable for jetskis and small ribs / large boat tenders to use for use at speed. With people swimming and wildlife it is in my opinion only a matter of time before there is going to be an accident in a remote location. The impact on local wildlife noise / waves cannot be positive.</p>	No	The recommendations under RT1 and RT2 are to review current speed limits and decrease conflict between motorised and non motorised watersports and swimmers, specific areas or management plans have not been detailed at this level and will be determined through separate lines of work with the relevant organisations and industry.

JMSP-581511839	Seabed protection	<p>I, the undersigned Monsieur [REDACTED] a fisherman in Granville sailing in the waters of Jersey since the acquisition of my father's ship who himself sailed in its waters with his first boat (the [REDACTED] then with the [REDACTED] to [REDACTED] the year of its retirement. My grandfather also sailed in the waters of Minquiers with his boat which was called [REDACTED] in the [REDACTED]. I come from the 13th 6th generation of fishermen. Before Brexit, we fished regularly in the south-east, east, north-east part of Minquiers, as well as in the south-east part of Jersey particularly for clam and scallop fishing. I am not opposed to Marine Protected Areas (MPAs). However, small dragging ships like ours can fish in French MPAs, why are we automatically banned from fishing in Jersey MPAs? Our turnover in these areas is quite significant for our family business. If we lose access to these areas as proposed by the network of marine protected areas, this will put our business in peril. Our regional regulations prior to Brexit allowed us to manage particularly rigorous in your waters (daily quota, 92mm rings, fishing day with schedule, weekend closure, seeding of this area, four-month organic closure and a half from May 15 to October 1). This allowed us to strengthen the resource which is doing well, particularly in your waters. I would like you to take all these elements into account regarding me and thank you for them in advance.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511840	Seabed protection	<p>I am [REDACTED], owner of the [REDACTED], a 10m potfisher practicing whelk and shellfish fishing all year round, and of the vessel [REDACTED]: a 12m multipurpose vessel practicing scallop fishing from October to May, and the traps from the end of May to September. We are currently a small company with 6 sailors, 3 on each boat, and 3 people on land for the sale and maintenance of equipment.</p> <p>Our company was founded by my father [REDACTED] in [REDACTED], already working on traps on his wooden dory along the coast. From [REDACTED] and the purchase of the [REDACTED] we began to come to the Jersey zones currently A B and C. In [REDACTED] we bought the [REDACTED] we did dredging in winter and traps in</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>spring and summer, we work in zones A B and C following the Granville Bay treaty. In 2007 we developed the company with the purchase of a second boat, the [REDACTED] and currently the [REDACTED], which arrived in [REDACTED]. At that time we worked 80% of our time in Jersey waters. In [REDACTED] we lost the [REDACTED] following a fire, and in June 2021 we got our new boat [REDACTED].</p> <p>Originally I was one of the rare fishermen who could work in zone A. We have now lost this zone, there is also the Ecréhous protection zone which is now prohibited for dragging. 3 years ago, Brexit caused us to lose a lot of access and especially fishing rights. Now these are the habitat protection zones, how far will this go? I am currently of retirement age, my son and I would like to continue this business into the future. This is why he must take over the business behind me, as I did with my father, given the circumstances, it risks being very complicated, to the point that I wonder if we would not have an interest in stop everything, what is the future of fishing in Carteret if the doors of Jersey continue to close? The border is 5 nautical miles from our port, we are completely blocked by Jersey waters.</p> <p>We are small fishing units, we practice artisanal fishing with day trips. We have been working there forever and the resource is doing well, this shows that our impact on the environment is limited, so it must be possible to find solutions. Especially since there would be no problem for part of the sectors to be protected. However, certain areas are areas of concern for us, so it would be good to redefine the zoning.</p> <p>In your document, you talk about taking into account all the issues, including those related to fishing. In this case, I hope that you will identify the impact that the establishment of such sites will have on our activity and that you will take it into account when implementing your measures.</p>		
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		<p>Hoping that you will take these elements into consideration, please accept my sincere greetings.</p> <p>Hoping that you will take these elements into consideration, please accept my sincere greetings.</p>		
JMSP-581511841	Seabed protection	<p>My name is [REDACTED], captain of the [REDACTED] from Granville. My father, Mr [REDACTED] started his fishing career on the [REDACTED] in the [REDACTED]'s, he fished in the Bay of Granville, both in French and English waters and at that time everything worked well. He went on to buy the trawler [REDACTED] to carry on trawling for Praises, dog cockles but in better conditions.</p> <p>In [REDACTED] it was him that bought the boat that I work now. This meant continuity for our family business. The majority of our fishing was the same but we also fished for 'olivette'</p> <p>I took over the boat in 1998 and I continued to fish. Now I trawl for praires, dog cockles and I also dredge for scallops.</p> <p>I have been a coastal fisherman forever. My work crosses over between Norman water and Jersey water and I regularly work east of the Arconies, an area that is well sheltered and rich (abundant). This is an important zone for me, and its closure would have a detrimental impact on me. This is why I want to take part in this consultation and let you know my opinion.</p> <p>I hope that it will be taken into consideration because as soon as a MPA ...added onto the effect of Brexit and these last 3 years of uncertainty. I would like to point out that we have lost some rights, where before everything worked well.</p> <p>I just want to carry on working as I always have, and my objective is that my son [REDACTED] will one day start his career as a fisherman in the family business. For that to happen we need a future.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		We have always managed to communicate between our two regions up until now to find a compromise, I hope that this time again we will be able to find a middle ground which will enable us to carry on working whilst respecting what you are asking for.		
JMSP-581511843	Conservation	<p>I have looked at the Jersey Marine Spatial Plan consultation document. I can't immediately see where my comment would fit, so am emailing you as you kindly suggested rather than using the consultation portal.</p> <p>My comment is about the environment, and the painting of boat hulls with 'Anti-Fouling' products. 'Anti-Foul' is generally - by design - toxic to marine life. Yet it is applied, removed, and re-applied to the hulls of almost all of the boats in your marinas, annually. It is removed by scraping and hosing it off the hull, whereupon it runs-off into the environment.</p> <p>Boats which are not Anti-Fouled use significantly more fuel and emit considerably more CO2 and pollutants into the water through their exhausts.</p> <p>The only exception is a small category of vessels – those kept on platforms like.. tetradock and airberth. Those boats are generally not anti-fouled and run efficiently.</p> <p>The disadvantage in the use of such platforms (apart from the purchase cost) is that some of them add to the width of a boat in its marina berth, and so if every boat owner used one, the marinas could accommodate slightly fewer boats. But two points should be made in relation to that. Firstly, if Jersey is serious about the marine environment (as you evidently are) then slightly reduced marina capacity would be a price well worth paying for a fleet of boats that used no Anti-Foul. Secondly, in fact there are very few of these platform-owners anyway.</p>	No	Outside of scope of the JMSP

		<p>So, you would expect Ports of Jersey to encourage the use of these platforms, right? Wrong. In fact the perception of others to whom I have spoken is that Jersey Marinas dislike them and effectively have an unwritten policy of discouraging them.</p> <p>I should declare an interest. I am a motor-boat owner who is awaiting a marina space. I have also purchased an Air-Berth. I must say that I have not encountered the outright hostility to these platforms that others have anecdotally reported. In fact [REDACTED] has been engaging and friendly in his correspondence. However he points out that he can only offer those spaces that become available, and many of those are rather narrow for an Air-Berth (not least in the opinion of certain of the neighbouring boat-owners). That is entirely understandable, but the effect is that Jersey Harbours is discouraging ownership of these platforms, and compelling the use of Anti-Foul, contrary to your environmental objectives and contrary to the published commitment to “prioritising key environmental aspects of all areas within the business”.</p> <p>Please consider whether there should be a formal policy of encouraging the use of these platforms. That encouragement need not include monetary purchase subsidies but could for example include the fast-tracking of platform owners through the waiting list for marina berths. If berths needed to be widened slightly, that could perhaps take place incrementally over time.</p> <p>Please consider this proposal on its merits. It does not matter that I have an interest if it is a good proposal in itself. In any event I don’t have an interest: I am told that I ought to reach the top of the waiting list next Spring, before your JMSP is published so I personally wouldn’t benefit from any such measure.</p>		
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JMSP-581511844	Seabed protection	<p>1) While the UK and the EU are not agreeing on so many points. This is the prime time to ban French dredgers from the ecrehous and minquiers. In the past, Jersey always needed the French to agree. This never happened apart from a ban at the Minquiers where no scallops ever have been and one on the maerl beds at the south of the Ecrehous. 2) The French have a summer ban normally April-October on scallop dredging we have no such ban. 3) It has been said the damage on the sea bed is now at a serious point. I would agree and the Jersey dredging fleet continue to expand yearly. 4) Scallop stocks are high which is why the dredging effort is expanding, however it must be realised scallops are much tougher than many other species and can survive on dredged ground where crabs, lobsters, flatfish, sand eel etc cannot. 5) It is clear to see a ban on dredging is not to protect scallops it is to protect the seabed and its more sensitive species. 6) At the moment it is legal to dredge on many shallow areas in Jersey as shallow as 20ft from low spring tide this is ridiculous. 7) I am sure the potting fleet will disappear if scallop dredging is not restricted. The wetfish fishery of netters/liners has almost gone this must be in part due to the large French trawlers that can be seen passing through Jersey waters and fishing close to Jersey waters. 8) The expansion of scallop stocks is nothing to do with a few regulations, it is purely driven by the warming of the sea. 9) The dredgers will claim stocks are high yet never they are earning a lot of money. This is contradictory, I estimate a good days catch can be up to £7,000 easy. These are not fishermen who are struggling. Going on sensitive areas is just pure greed as there are many prolific scallop beds in deep water. If dredgers go into the shallow waters to void the wind thats a poor excuse. 10) Having a marine park will help conservation to a larger degree than the fisheries dpt have done in many years. 11) I feel a lot of people would like to know what the ambitions of the marine park and blue ocean (edit: marine) are. I feel the way to win support is to be very clear about what a marine park is otherwise sceptics will appear</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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JMSP-581511844	Seabed protection	12) Personally I am not for No Take Zones especially in the areas as we already have large tides and most fish and habitats will move about	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.
JMSP-581511844	Economic development	13) I can certainly see any expanse in the dredging fleet of Jersey and scallop diving will not be viable as we have to compete on the price but we simply cannot catch enough to be viable as a dredger generally catches smaller and often grit impregnated and not as fresh but 10 times as many. Many restaurants facing their own financial problems will sacrifice quality for price.	No	This will be addressed by priority FA5 - economic development will be addressed through Marine Economic Framework.

JMSP-581511845	Seabed protection	<p>My name is [REDACTED] and I have carried out professional fishing activity in the waters of Jersey since June [REDACTED], first as a sailor, then, from [REDACTED] to [REDACTED] alone aboard my boat the "[REDACTED]". Since January [REDACTED] my son [REDACTED] has been sailing with me in order to resume my activity. We fish mainly lobster and spider crab in the trap, on the Minquiers plateau. I was one of the actors in the Bay Treaty of Granville of which I participated in all the preparatory meetings from [REDACTED] to [REDACTED] then, after its signing, I sat on its committee of management until its repeal in 2020. Collaboration with Jersey representatives were at first hesitant then constructive then tense again against the backdrop of Brexit. In 2000, the treaty had enshrined a sharp reduction in our fishing rights in Jersey waters, reduction largely agreed and in return for which a space co-management system maritime had been put in place. In this context, we have by mutual agreement defined the exclusion areas of dredging in the Minquiers and Ecréhous, which, while meeting Jersey's RAMSAR obligations, preserved our fishing rights to the maximum. This win-win system does not seem to underlie your current project where most of the areas you are proposing to ban dredging seems modeled on their main fishing places, while, in other areas, your protection cards (charts?) and our activity cards (charts?) do not overlap. Furthermore, it seems to you that a protection zone must absolutely exclude dredgers when their activity has, until now, not prevented the seabed you claim to protect from prospering and that this activity, TCA obliges, does not have a function to increase. You wish, for the sake of consistency, to connect your network to the French AMP network. You will no doubt have missed that the activities of dredgers are not prohibited there because they are considered as having little impact on habitats. If your project were to succeed as is, it would constitute a strong reduction in the fishing rights of our smallest dredgers, by excluding areas closest to our coasts, which is contrary to the spirit of the TCA. This would be a very bad message to send in a</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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		<p>context where the embers of Brexit are not extinguished and where negotiations on the continuation are not completely finalized. As far as I am concerned more directly, your activity records of</p> <p>French potters, for crustaceans as for whelk, show little or no presence in the eastern and southeastern parts des Minquiers while we work there all year round, as well as in the NTZ des Sauvages where despite an activity regularly for decades, the species you say you want protect seem to prosper. Species which for the gorgon, coral of cold water, would be more sensitive to warming than to fishing and including protection by banning low-impact fishing in shallow waters is in vain in the face of the increase in temperatures. As for the brachiopods, they appear, by their size, insensitive to our activity. Creating an NTZ in such a busy place, the size of approximately 160 football fields, for reasons so unfounded seems more in the spirit of the times than to a real concern of conservation. Thanking you for involving us in this consultation, best regards. [REDACTED]</p>		
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JMSP-581511846	Seabed protection	<p>I am the owner of the [REDACTED] and I am the owner of the [REDACTED], two bulotiers from [REDACTED]. In both cases, my boats mainly fish for whelks but also for crustaceans, especially spiders.</p> <p>I work all year round between the Bœuf sector and the Arconie plateau. We have a border activity, both in Jersey and Normandy waters. There are many of us who work in this sector, whether it is the caseyeurs or the drags, it is a rich and very interesting area for fishing. The fact that there are many people and with different jobs raises issues of cohabitation. Following Brexit, between those who had access to Jersey's waters and those who did not, a balance had to be found in order to allow everyone to work. Now you want to set up marine protected areas, including a large one in eastern Arconia. This will bring about strong changes in the practices of the stragglers because, if I understand correctly, they will no longer be able to come.</p> <p>In practical terms, this means that they will have to go and work elsewhere. This will therefore have an impact on the entire fishery in the sector. And this will therefore have major consequences for other professions: problems of cohabitation, fewer opportunities for rotation between professions. This will therefore have an impact on all the fishing companies on the coast but also on the resource : we will no longer be able to change areas so easily, which risks exhausting certain sectors.</p> <p>I am involved in fisheries management. When it is necessary, I think it is normal to take measures, but I must admit that I do not understand the point of taking measures on areas in good condition at the risk of having negative impacts on the resource.</p> <p>According to the document, currently only the trailing arts are concerned except at the level of the Savages. What will happen to the dormant arts in the years to come? Is the ban on the</p>	Yes	<p>The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. Catch and release will not be considered in No Take Zones as it is not possible to enforce. Catch and release is also a highly stressful event for the fish that are caught and is therefore not conducive to an area that is a sanctuary for marine life.</p>
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		<p>Indians a start? The process that has been launched with this document is very worrying for us, we have the feeling that it comes as a continuation of Brexit in order to kick the French out.</p> <p>I've always worked in this industry, so far our relations seemed good to me, now I feel like we've become the pet peeve. However, our practices have not changed, on the contrary, measures are regularly taken to reduce fishing effort. It is therefore difficult to conceive of the establishment of such sites and that they only constrain fishermen.</p> <p>Hoping for a return to more peaceful and fluid relations, please accept, Sir, my distinguished greetings.</p>		
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JMSP-581511847	Fishing restrictions	<p>With regard to angling - 1. Netting across the gutters for long periods, particularly cross spring tides, is reducing the amount of fish in the area and negatively impacting on anglers. This is happening around L'etacq, La Pulente and in areas on the east coast. No fish were caught for 4 months by kayakers/shore anglers after a short period of heavy netting activity.</p> <p>2. The location of the nets is the main issue. Where there are areas of shoaling fish, nets should be restricted.</p> <p>3. The bass closed season should be extended to allow more to breed – still catching roed females after the closed season.</p>	No	A new action (FA2e) has been added to review commercial fishing in proximity to angling sites.
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JMSP-581511852	Fishing restrictions	<p>To whom it may concern</p> <p>My name is [REDACTED] and I'm [REDACTED] years old and have been a full time fisherman for over 30 years. I have a small young family to support as well as a crew member. I started many years ago with a small boat and still currently fish on a catamaran that is under 7 meters. I enjoy being a small business as I am able to stay versatile & sustainable. I catch lots of different types of wet fish and change with the seasons, eg rod caught bass and bream in the summer, changing to use nets in the winter. I don't fish every day as I pot for lobster & crabs.</p> <p>Also, even if we wanted to fish more, it's just impossible, due to very high fuel prices, bait costs, prices of new engines and general maintenance costs, etc. Fishing regulations are also quite strict & we must follow them up with our paperwork & install trackers on our boats, tags on pots, etc.</p> <p>Between constant storms and the 2 month bass ban, that also reduces the amount of days that we are at sea. As the boat is small, it needs to stay close to land to tuck in for shelter. The fishermen have an understanding that they each fish in their own area so it won't be overfished just in a couple of places.</p> <p>Our carbon footprint is very low as all the wet fish stays local. We sell to the restaurants, markets and people on the beach who approach us. Our customers are proud of us for fishing all year round and would rather enjoy our fish than farmed fish imported into Jersey.</p> <p>As you are aware, more restaurants and hotels are closing down, so it not possible to actually catch a huge amount of fish as it is getting harder to sell.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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		<p>We would really appreciate you taking into consideration our comments. It feels at times, that it is all bad news, never good when it comes to fishing. We do our absolute best to be the best at what we do and we are proud of our beautiful produce and also want to protect the stocks for future generations.</p> <p>Kind regards</p> <p>████████ Skipper of the ████████</p>		
JMSP-581511853	Seabed protection	<p>I would like to give you feedback on the current public consultation. ██████████, █ years old, skipper and owner of the ██████████, since March ██████. I have been registered as a seafarer since ██████ and have been fishing since I was 20.</p> <p>I am the third generation of fishermen in my family. My father and grandfather before me worked in the waters of Jersey, Guernsey and Sark.</p> <p>I fish for whelks and large crustaceans (spiders, lobsters) in the Dirouilles and Ecréhou area, all year round, except in January due to the closure of whelk fishing.</p> <p>Cohabitation with Jersey fishermen has always gone well for me. Relations were already good under the Granville Bay Treaty. Since Brexit, and despite the initial implementation difficulties, both for Jersey fishermen and French fishermen, these relations are still good between fishermen today. I would like to give you feedback on the current public consultation. ██████████</p> <p>████████, █ years old, skipper and owner of the ██████████ since March ██████. I have been registered as a seafarer since ██████ and have been fishing since I was 20.</p> <p>I am the third generation of fishermen in my family. My father and grandfather before me worked in the waters of Jersey, Guernsey and Sark.</p> <p>I fish for whelks and large crustaceans (spiders, lobsters) in the Dirouilles and Ecréhou area, all year round, except in January due to the closure of whelk fishing.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>Cohabitation with Jersey fishermen has always gone well for me. Relations were already good under the Granville Bay Treaty. Since Brexit, and despite the initial implementation difficulties, both for Jersey fishermen and French fishermen, these relations are still good between fishermen today. It would be a shame if small-scale artisanal fishing disappeared from Normandy and Jersey waters, because in my opinion, it is the most respectful fishing for the marine environment, with thoughtful and sustainable management of resources and seasonality. Once again, you present to us here measures which will reduce the fishing possibilities of professional vessels, French or Jersey. This therefore adds an additional constraint to fishing. We feel completely excluded, whether with the loss of fishing zones but also with the implementation of this type of approach. We have always worked in the waters of Jersey and it is difficult to imagine being excluded from it given our history but also given the distance that separates us: only a few miles between Carteret and Les Ecréhous...</p>		
JMSP-581511857	Seabed protection	<p>Dear Marine Spatial Plan Team,</p> <p>I am writing to you to confirm and reinforce my support for the proposed Marine Protected Areas (MPAs) proposed in the Marine Spatial Plan (MSP).</p> <p>This is a critical opportunity to protect our marine environment for both current and future generations. I hope and pray that those with the power and responsibilities to implement and enforce these protections have the wisdom and commitment to deliver this now and and full.</p> <p>There should be no doubt by those in possession of the facts and scientifically proven evidence that the MSP effectively reflects Jersey's responsibilities to the Global Biodiversity Framework (GBF) and its targets to reach 30 per cent marine protection by the year 2030. Priority NB5 in chapter 8.6 outlines</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>suitable actions to meet the targets of the GBF by expanding Jersey's existing MPAs, where mobile fishing gear is not permitted, to 27 percent of territorial waters (with the addition of exclusion zones around underwater power cables).</p> <p>I believe this would benefit the lower-impact, static forms of commercial and recreational fishing (which will be able to continue unaffected within MPAs), by ensuring the long-term health of key stocks such as crab and lobster (which make up 70% of Jersey's annual fishery value).</p> <p>Additionally, protection of the proposed areas are also extremely likely to result in ongoing recovery and growth of nationally important habitats that also serve as important nursery, spawning and feeding grounds, leading to an increase in biodiversity and increased resilience to storms and climate change. The benefits to the vast majority of current and all future generations need to be acknowledged, and the local and wider community needs to be protected from the tiny minority of those practicing out of date and unnecessary fishing activities that should have no place in our future.</p> <p>As a whole, I urge for the proposed MPAs to be delivered through the actions of priority NB5, resulting in 27 per cent of our waters being protected from mobile fishing gear.</p>		
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JMSP-581511858	Seabed protection	<p>I am Mr [REDACTED], [REDACTED]-year-old fisherman, owner of the fishing vessel "[REDACTED]" purchased in September [REDACTED]. Coming from a family of fishermen, it was my father when he was boss of the trawler "[REDACTED]" who gave me the desire and passion to work as an artisan fisherman. Since [REDACTED] I have been on board the [REDACTED]. In [REDACTED], I became the boss and have been the owner since [REDACTED]. So I have been on the same artisanal fishing vessel in the same waters for 23 years.</p> <p>As you can see, I am the vessel with the most days acquired in Jersey waters. This is explained because I practice my profession ONLY in Jersey waters and all year round.</p> <p>This is why I am committed to maintaining good relations with you. I provide you with my fishing declarations on time. Each time I am checked by your control services, and this for years, I am always courteous, polite and open to dialogue to maintain our good neighboring relations, even since the complications of Brexit. Thus, I scrupulously respect Jersey regulations. I have never been fined for overquotas or oversizes, for example. If I work entirely in Jersey waters, it's because I have no choice, no other places where I could fish for sea almonds (GKT). This very localized species represents 3/4 of my annual fishing.</p> <p>I am one of the only vessels in Granville and even in West Cotentin to practice this very specific fishing. Unlike other vessels which fish mainly around Chausey, with the possibility of sheltering around the archipelago in the event of bad weather, my activity causes me additional diesel costs to reach the waters of Jersey. In addition, I have no shelter areas, I am always in the wind.</p> <p>My activity requires me to work in specific sectors. I have no other choice than to work to the South and West of Minquiers, around the existing RAMSAR zone. I also work in the CAUX sectors, at ANQUETE, GRUNE LA HAUCHE, Les ARCONIES, de l'ECREVIERE and in the telephone cable sector.</p> <p>All of these areas mentioned are essential to the proper functioning of my business. I am also surprised that the fallout linked to BREXIT is not over and that our neighbors in Jersey</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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		<p>already want to impose new fishing bans on us via marine protected areas (MPAs) by systematically excluding dragging arts. In France, MPAs do not systematically exclude dragging arts, which thus remain authorized. So I'm at a loss.</p> <p>I would like to say that I work in sandy bottoms, contrary to what the habitat map may indicate in certain areas, and that I can assure you that I have never found eelgrass, Kelp or Maërl beds in the sectors where I carry out my activity. Proof that trolling fishing is compatible in certain sectors. Protecting does not mean prohibiting. Therefore, I ask you to study my personal case, to begin a dialogue in order to find "common ground". I hope that we can consult together, discuss areas to prioritize over others. I hope that we find solutions jointly that are suitable and accepted by everyone, as has been the case in the past for RAMSAR areas and which has proven itself. Finally, I would like to share with you that the survival of my artisanal fishing business and that of my family depends EXCLUSIVELY on my fishing activity in Jersey waters. My business supports 3 sailors and their families. It also supports my own family since my father and my wife are employed on land for the company.</p> <p>If unfortunately all the proposed MPAs were banned for life, I would be obliged to stop my job which I do with passion, to sell my boat which is my whole life, to lay off my 3 sailors, as well as my father and my wife. It would be terrible.</p> <p>Hoping that my participation and my example will be studied and considered by Jersey. I remain convinced that the friendship between our two countries will make it possible to find a common solution. I cling to this hope in order to be able to continue to make a living from my profession which has been passed down to me from father to son with passion.</p> <p>Indeed, since Brexit and all the consequences, morale is at its lowest and the fear of losing everything overnight has an even greater impact on morale on a daily basis.</p>		
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		While waiting for news which I hope will be positive in order to find common ground between the different parties, I send you my sincere greetings.		
JMSP-581511859	Seabed protection	<p>I am writing to draw your attention to the negative effects of the displacement of the mobile gear boats from productive scallop grounds to less productive ones. Due to the proposed MPA with in the MSP , This issue has significant implications for both the environment and the livelihoods of countless individuals dependent on the Jersey fishing industry.</p> <p>One of the major challenges arising from such displacement is having to have to move to less productive areas offshore , where the catch rate is much lower increasing the time and effort required this in turn increases disturbance the complete opposite of the intended result of such a scheme. This results in overfishing in these areas, Overfishing not only disrupts the delicate balance of marine ecosystems but also jeopardizes the sustainability of the fishing industry in the long run , as the Jersey fleet are already in a very precarious position I feel the loss of the mobile gear fleet will take the fleet below critical mass and will mean the loss of merchants in turn will mean other metiers of fishing suffer as will to supply chain of local sustainable fish and shellfish.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

		<p>The economic toll on these individuals and their families cannot be understated, as their ability to carry on in the fishing industry, food security will also be severely affected.</p> <p>It is essential for policymakers, fisheries management and stakeholders to recognize the negative consequences of this displacement and take appropriate action. We all agree that measures should be taken to ensure sustainable fishing practices and establishing marine protected areas. These actions can help restore balance to the fishing industry and protect invaluable marine ecosystems for future generations but must not come at the cost of losing our long established fishing industry.</p> <p>In conclusion, the displacement of our mobile gear fleet from productive fishing grounds to less productive ones has grave consequences for both the environment and the livelihoods of Jerseys fishers . By considering the long-term implications and implementing sustainable practices, we can work towards a future where fishing grounds thrive, Jersey fishers prosper, and the delicate marine ecosystems are preserved.</p> <p>Thank you for your attention to this matter</p>		
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JMSP-581511859	Cultural Heritage	<p>Additionally, the displacement of the mobile gear fleet can have adverse social and cultural effects. Fishing has historically played a crucial role in Jerseys identity ,</p> <p>As Jersey witness the decline of its fishing industry due to displacement, there is a loss of cultural heritage and a sense of belonging. This could potentially lead to the loss of traditional knowledge and practices that have been passed down through generations.</p>	Yes	<p>Additional text has been added to sections 9.4.2 and 9.4.3. to highlight economic development for the fishing industry and to outline its importance in Jersey's cultural identity.</p>
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JMSP-581511860	MSP	<p>To whom it concerns,</p> <p>I am writing this letter as a response in the consultation process of the proposed Marine Spatial Plan (MSP) and accompanying proposed MPA.</p> <p>For background, my name is [REDACTED]. I am one of the owners and Directors of [REDACTED], [REDACTED].</p> <p>At [REDACTED] we act as both fishermen and merchants, and through [REDACTED] we try to ensure the public and tourists alike have access to guaranteed local seafood. Therefore, my response can be taken as a response from both businesses.</p> <p>[REDACTED]</p> <p>[REDACTED]</p> <p>[REDACTED].</p> <p>The recent release of the first draft MSP framework, into the public domain, represents a significant step for Jersey. Although I have no opposition to the creation of a MSP itself, I recognize the significance of what is proposed and its potential negative impacts on those that it represents and wider industry.</p> <p>[REDACTED] has and continues to be committed to working with Government and other associated bodies, to ensure that there is a sustainable and economically viable fishing industry into the future.</p> <p>It is my hope that through this consultation we can assure the MSP process is transparent, evidence based and underpinned by good independently reviewed data. I believe that by working truly together an MSP with an associated MPA can be created in which Jersey's marine economy is secure and has a future but also that the Island's waters can also be appropriately protected for future generations.</p> <p>It is crucial, that recent announcements to designate large areas of Jersey's waters as Marine Protected Areas (MPAs) and consequently closing them to some forms of fishing, does not result in a rushed and unworkable MSP document which jeopardizes the future of our fishing community. The draft MSP document in its current form would have direct substantial</p>	No	<p>The time frame is in line with island plan time lines. The time frame for development and consultation of the MSP is considered suitable for the size and scale of the plan. Based on best available evidence at the time of writing and will evolve and be updated in future as new data becomes available.</p>
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		<p>negative consequences for a number of members of Jersey's fishing industry and could as a result considerably affect the Island's food security, hospitality industry and the public's ability to access local seafood. Additionally, there are knock-on concerns for ancillary businesses within the industry (critical mass), adding to the economic and social impact of what is proposed.</p> <p>I fully understand the value of protecting our marine resources and myself actively promote this, I do wish to support Government in their work to create a meaningful and workable framework, however there are several concerns within what is proposed for Jersey's marine economy in particular the fishing community. I have listed this briefly below, and this is by no means an exhaustive list. I welcome and please do feel free to meet with me privately to discuss the below further.</p> <p>1) The excessively short time-frame committed to the creation of the MSP framework, originally it was indicated this draft framework would be completed by 2025 however this timeline has been brought forward a year (evidently to coincide with the carbon strategy and Island Plan 2025 – which is understandable yet inappropriate given the scale of what is proposed). This raises concerns for the industry over the quality of work undertaken, the understanding of our waters and how they are used and the ability for a true and fair consultation to be conducted.</p>		
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JMSP-581511860	MSP	<p>2) The lack of true and long-term consultation with the fishing fleet – although some engagement has occurred with industry, this has not been good enough and very last minute. The MSP as it sits in its current form only affects fishermen and not the rest of the marine users so it only stands that larger engagement should occur with this group. This MSP and lack of engagement follows a precedent set over the last few years (approx. 5+years) of poor and limited engagement from the Fisheries Department with the fleet. Communication between the two has never been at such an all-time low. This is deeply concerning. It surely stands to good reason that fishermen should've been a critical part of developing the MSP and proposed MPA, aiding in identifying the best areas for protection in a far more hands-on approach. Additionally, it has been felt by many in the community their input was not wanted, and many have raised concerns that fisheries officers did not want them attending the public consultations at the Parish Halls. These individuals know the waters and stocks better than anyone, they are the stewards of our waters and are the first individuals to want to see healthy marine environments. They should be the first port of call in any development or change to do with our marine environments and marine economy.</p>	No	Significant consultation was carried out with all stakeholders from the earliest stages of the JMSP.
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JMSP-581511860	MSP	<p>3) The inherent lack of validated good quality data presented in the first draft. It has for example, transpired that the consultants retained by Government to oversee the project have not independently audited the accuracy of the data prior to its release within the first MSP draft. Although it is now my understanding that St Andrews University have conducted a peer review of the reports used to form the MSP it understood this would have been a literacy review, which is just the first aspect of an audit. For a project of this magnitude, one would expect standard protocols to be followed with “boots on the ground” independently auditing the data collection, coming to Jersey taking their own samples and performing their own analyses. I previously worked on large scale international projects, for NGOs, private companies, and Government projects, and for a project such as this an independent physical audit would be undertaken of the data. As it stands at this point the industry feels this has been a ‘marking your own homework’ exercise – whether this is felt valid by the department or not this is a concern being raised.</p> <p>4) Following on from point 3; There are large areas where seabed data and active fishing data appear to be lacking or missing altogether particularly in regard to fishing activity. This is a concern several fishermen have raised from a variety of fishing activities. This is very evident across Figures 9. I would be happy to sit with you and highlight on these figures the areas fishermen actively fish but feel have been left off to show no activity.</p>	No	We are confident with the data provided and future iterations will build on current knowledge.
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JMSP-581511860	Seabed protection	<p>5) The seemingly lack of consideration given to the socio-economic impact the MSP may have on specific communities being directly affected. There appears to be no study analyzing the social, historical and economic impact the proposed MSP may have on the marine economy in particular Jersey's fishing community and the potential effects further down the line such as an increased reliance on imported seafood.</p> <p>It has been indicated to me that an assessment will be conducted on the 7 businesses/boats directly affected. However, this should have been conducted before the draft was publicly released. As previously raised in point 3 I have worked on international projects and no plan of such a scale would ever be voted upon until such a study was conducted. Additionally, by solely looking at the directly affected, this is thinking far too insular and small scale. The reduction of effort or in some cases the complete failure of these businesses (which they believe is the case) will affect the wider fishing community and the ancillary businesses associated (e.g. Mechanics etc), which will further lead to affects felt in hospitality and tourism. These boats support and are supported by the merchants who also support the other forms of fishing in the Island, the merchant community has raised considerable concerns over the removal of these boats on their ability to supply customers (both export and local) which will impede their ability to operate and support the remaining fishermen. The lack of produce will directly reduce the quantity of scallops available on the Island which almost forms a lifeblood across menus Island-wide, the hand diving community cannot absorb this business and it would be ignorant to think they could. Concerns would be that imported scallops would become a norm (increasing carbon footprint and creating a NIMBY situation). Further to this these boats are a large part of our cultural heritage, with the majority being generational fishermen who helped to build the industry and even with ties to the occupation and further. This loss of knowledge and history should be taken into consideration.</p>	No	A Business Impact Assessment will be carried out before the final version of the plan is released. Issues relating to supply chains are outside of the scope of JMSP.
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JMSP-581511860	Renewable energy	6) Although it has been communicated that the potential new wind farm in Jersey's waters would not be included in the MSP the industry does feel this is an oversight. It has caused additional anxiety and concern across the fishing community, the size and location of the proposed wind farm would be a concern, if the proposed MPA areas are also enforced in their entirety. Both locally and globally fishermen are feeling the spatial squeeze as areas of fishing are lost to non-indigenous fishermen, MPAs and carbon neutral objectives.	No	Outside of scope of the JMSP - the JMSP does not go into the detail of a windfarm as Jersey is only in the early stages of investigating a windfarm following the approval of the proposal to the States (P82-2023). Local stakeholder and neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."
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JMSP-581511860	Climate	<p>7) It appears no consideration has been taken to the effects of climate change on changing stock levels (warmer waters affecting stock patterns, increasing winds meaning less days at sea etc). Further to this the MSP indicates well over 100 Jersey fishing boats are present in our waters. There are only (approx.) 33 active full-time fishermen in our fleet something confirmed by the Fisheries Department, so it feels somewhat misleading to present the higher value and for no consideration to be taken to declining fishermen numbers on data presented. Additionally using data from 2020 (covid) is particularly unfair as this year activity was greatly reduced by all boats.</p>	Yes	<p>Climate change related pressures on the marine environment are not easily mitigated through spatial measures, but the JMSP takes blue carbon habitats into account in the MPA network. In terms of changes to fishery species distributions/abundance, it is difficult to predict which new species may arrive into Jersey waters and therefore not possible to predict future spatial management needs. However, the JMSP will be periodically updated to account for changes in the marine environment over time. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. Boat activity levels vary from year to year and are reflected in the Marine Resources annual reports.</p>
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JMSP-581511860	Seabed protection	8) There appears to be no recognition within the MSP that questions have been raised globally over the success of MPAs with other evidence pointing toward more positive outcomes stemming from re-addressing fishery management. Something the community has been pushing for and wanting to develop in conjunction with the Department.	No	The benefit of MPAs for biodiversity is strongly supported in the literature and the primary aim of the MPA network is to improve biodiversity in Jersey waters. What is disputed in the literature is the benefit of MPAs for fisheries, with benefits often taking many years to be realised in terms of spill over - and with varying impacts on different fisheries. Improving fisheries through fisheries regulations is outside of the scope of the JMSP.
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JMSP-581511860	MSP	9) There have been no measurable aims or KPIs provided within the draft MSP, and how and when these will be measured and what will be identified as successes and failures.	No	Outside of scope of the JMSP. It is not known if all of the recommendations will be accepted for final inclusion in the plan. Measurable outputs will be decided on when the recommendations are taken forward as their own streams of work.
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JMSP-581511860	Seabed protection	<p>10) The displacement of Jersey mobile-gear fishing boats into more distant and more dangerous waters is a concern not just for safety, but also economics, the increased distance increases costs to fish (fuel, time at sea etc) and the carbon footprint increased on the products caught. Jersey fishing boats are not designed to fish in these areas.</p> <p>11) There are also questions and concerns regarding the overexploitation of the remaining seabed areas outside of the MPA. The proposed MPA dramatically reduces the fishable ground for mobile gear boats (by approx. 80%) the existing effort would be moved into an even smaller, and less productive area.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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JMSP-581511860	MSP	<p>12) The language and tone of the document comes across as fairly 'anti-fishing' which the industry feels is inappropriate and paints an incorrect picture of the ecosystem and the industry's activities. The pot, rod and net fishermen would like to ensure there are guarantees that they will not be targeted into the future as this is felt to be insinuated within the document. Furthermore, the additional suggestions of no take zones etc. are very concerning for those who actively use these areas, although they may be few this could have disastrous affects for their businesses and employees.</p> <p>I would like to clarify that I am not against the concept of an MSP or MPA. However, there are serious concerns about the proposals outlined in the draft MSP. I would like further clarification and information surrounding the proposed MSP. I would ask for the deadline to be further extended so more in-depth engagement can be conducted with the fishing community.</p>	Yes	<p>The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. The consultation was extended to allow additional input. Further engagement work will take place ahead of the implementation of new spatial management measures.</p>
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JMSP-581511861	Renewable energy	The proposal suggests closing 27% of local waters to mobile gear-before a wind farm will take another 11% if it were to go ahead.-that equates to 38%. We currently have 7% of waters where mobile gear is forbidden.	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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JMSP-581511861	Seabed protection	<p>The msp proposal and the reckless MPA's within it have really affected me and my well being over the last few months, the constant worry and anxiety of possibly not being able to do my job in the future. I have been a fisherman since leaving school after my GCSE's at 16 years old, I'm proud of what I do and wish to continue feeding people the best food available. Why is this happening in this way, I cannot believe that our marine resources panel and government think it's ok to treat other human beings in this way. There has been no proper consultation or dialogue with the fisherman this will affect up until recent months once there was already a deadline in place. We are hard working business people that pay our taxes and contribute to the island, yet we have been treated like we don't matter.</p> <p>This whole plan has been rushed. There is simply not enough evidence in ways of data or recent research been carried out to warrant the proposed MPA's and their whereabouts. The sheer scale of the MPAs are ridiculous and would see jersey with the most protected waters in the world. I've read through the document, far too much heresy and not enough hard facts. The impact this would have on the island and it's ability in the future to harvest a natural resource would be to the detriment of everyone living in jersey not just the individuals who go fishing.</p> <p>Some clear facts:</p> <p>The proposal suggests closing 27% of local waters to mobile gear-before a wind farm will take another 11% if it were to go ahead.-that equates to 38%. We currently have 7% of waters where mobile gear is forbidden.</p> <p>The Uk currently has 8% of its waters that forbid mobile gear, they do have a higher percentage of MPAs in which mobile gear is allowed.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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		<p>In the whole world only 2.5% of the seas forbid mobile gear, who thinks it ok to suggest jersey could bring in catastrophic measures and see its local food security cut off?</p> <p>The same can be said with French waters(less than 5%) on the adjacent coast-one only has to look on AIS to see our Normandy counterparts working within the sound of chausey, under their coast etc(I did send some previous photo evidence of this) the baie de Seine scallop fishery is probably the most successful managed scallop fishery in the world right now and it operates within an MPA.</p> <p>Who can justify this outrageous disproportionate proposal within the MSP draft? It seems someone has forgot to do their homework, some of the fisherman are seeking legal advice on this matter, it seems this would be discriminatory against jersey fisherman. The MPAs within the proposal are more similar to HMPAs that are very few anywhere in the world, in fact the Scottish government recently threw out a proposal for under 10% of HMPAs in its waters, stating it was unworkable and would kill off coastal communities. Europe have recently announced there must be more work done before creating any MPAs that see mobile gear stopped. There has to be more consideration given to the fishing industry, and food security before this goes any further. There hasnt been any mention to differentiate between scallop/prairie dredging and bottom trawling(which has far less impact on the seabed). If fish stocks change as they often do with nature, there will be no scope within this proposal to invest or expand to take advantage of species that require trawling to harvest them. There must be a balance struck between environmentalism and allowing natural food to be harvested. The best wild source of protein on our doorstep. What will happen to the great healthy scallops stocks we are seeing at the moment-they will simply die off. The local restaurants will gradually have to take them off their menus as</p>		
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		<p>they become more expensive as diving would never keep up with the present demand, meaning more imported produce and the island increasing its carbon footprint, this proposal has been poorly thought out.</p> <p>If implemented this for sure would be the death knell of what's left of our local fishing industry, as it is, we are only just hanging in there, it will only take a few more boats to leave before the rest of the infrastructure collapses.</p> <p>It would for certain give me no option but to leave the job I love. I bought the present boat I have in [REDACTED] as a multipurpose inshore trawler, all our boats are around the 10 meter mark, their impact on the Enviroment is minimal, and in my opinion is far offset with the good food they provide. They are suited to fish inshore sheltered waters, grounds offshore and to the west cannot be compared, the boats aren't big enough to work these areas successfully year round-this proposal would ultimately put life's at risk. I now find myself working alone as youngsters seem to have stopped wanting to enter the industry. I cannot diversify as I have done successfully in the past, with no crew around at the moment and the economics of returning to crab and lobster fishing, I am dependent on the inshore scallop fishery. I've invested heavily last year in the boat and ashore on my premises-I'm now worried this could have been a bad move.</p> <p>I would love to see the government of jersey really get behind the fishing industry moving forward. With the right input we could have a thriving managed fishery like our French neighbours, closed seasons and closed areas whilst seeding immature scallops. I'm sure the lobsters and crabs will come good again too soon, over the years you learn that you can't control nature and one has to adapt, if this opportunity is taken away the job wouldn't be possible. There is a place for MPAs in the marine environment if they are carefully considered alongside all stakeholders. I forward some pictures of my</p>		
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		<p>navigation plotter(my max sea computer is currently being repaired-I'm happy to share at a later date if wanted)which show the grounds I am so dependent on.</p> <p>Please revisit this whole proposal of MPAs alongside the fishing industry. The island of jersey and its people deserve a fishing fleet to harvest the wonderful seafood on our doorstep. And fishing really is the best most rewarding way of life in the world.</p>		
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JMSP-581511862	Seabed protection	<p>To the public of Jersey,</p> <p>I would like to highlight as a mobile gear fisherman the importance of my traditional fishing grounds. If the proposed areas set out by the fisheries department go ahead, I will loose up to 80 percent of the areas that I use to make my living from.</p> <p>I have been catching scallops for 22 years, and have a combination of local and export sales. My business has stabilised after the exit from the European Union and also managed to overcome the negative impact of Covid 19.</p> <p>As a consequence, of the unrealistic timeframe given to the fisheries department with relation to the MSP, It has caused a huge unsettling between the fisheries officers and the fleet they work alongside. The evidence presented in the MSP has flaws, which I believe to be as follows</p> <p>The areas inside of jerseys exclusive 3 mile limit were sampled with actual physical samples more often than other areas where the french scallop fleet is active. The department switched to using towed video cameras with an accuracy of only 70 percent for less enforceable areas of the islands territorial seas.</p> <p>The 30 percent of the MPA target that the environment minister has set is well above the commitments of any other coastal state on the planet and does not acknowledge important deep water habitats or HPMA's, and also where extremely volatile species exist. Also, not taking into account the scale of the environment ministers proposed wind farm project. This is some 11 percent of Jersey's total enforceable sea area excluding MPAs. The total would be closer to 40 percent of closed areas for fishing if this spatial plan is not scrutinised thoroughly.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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		<p>We have a fleet of 7 trawlers with a total power of 1300 kilowatts, which is roughly 15 percent of the issued KW to our french counterparts in the mobile gear sector, free of charge. No economic link has been established, not even for the administration costs of processing french licenses. This seems to be the responsibility of the Jersey tax payer.</p> <p>I must include, that given the exceptional quality of local scallop stocks the mobile fisherman of Jersey, are desperately seeking proper fisheries management to allow a brighter future for newcomers and a better product for consumers. I also want to highlight the outstanding support our sector has received from the wider public over the recent years.</p>		
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JMSP-581511865	Management	<p>Hi , I am a professional fisherman with forty years experience fishing for crab and lobster, and would like to share my views on jerseys marine spatial plan.</p> <p>Firstly some of the charts used to show fishing activity in Jersey waters are not accurate. There are areas on the charts that show no fishing activity. When in fact these areas are fished regularly by a large number of boats. I know for a fact that fishermen gave information to show where we fish ,so why isn't it shown?</p> <p>Big decisions that could impact a person's livelihood shouldn't be considered on incomplete data and no impact assessment .</p> <p>Also it's claimed in the plan that 45000 pots are fished in our waters . I believe this is totally false, and would like to know how this number was calculated?</p> <p>On the subject of lost fishing gear on beaches -as a dog owner I spend a lot of time walking on beaches and the majority of gear washed up is from French boats.</p> <p>Finally the consultation process has been very poor. The minister has not been at any of the meetings with fishermen. Instead he sends fisheries officers, and fishermen have no way of knowing if their concerns ever get relayed to the minister in charge.</p> <p>I don't understand why / how Blue Marine (founded in Monaco) is so involved in telling the government how to manage fishing in our waters? I haven't met anybody from Blue Marine who has ever worked in the fishing industry . I haven't heard of any fishing communities that has benefited from the involvement of Blue Marine .</p>	Yes	<p>Spatial fisheries data was gathered from a variety of sources as laid out in the MSP evidence base documents. Datasets were checked and verified against each other. Further data is being gathered to support the Business Impact Assessment being run on the proposed MPA areas. 45k pots is based on the number of licensed fishing vessels and their pot allocation and pot tag orders.</p>
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JMSP-581511870	Seabed protection	<p>Generally think it is a good idea, there has already been a noticeable difference in the number/size of scallop inside the current MPAs and it is expected that the extended MPA zones would only improve on this.</p> <p>St aubins is too heavily dredged at the moment, not sure how there are any scallops left.</p> <p>Measures should be brought in now while the scallop stocks are good to ensure sustainability going forwards.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511870	Seabed protection	Do not want anymore No Take Zones around the coast.	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.
JMSP-581511870	Harbours	Do not want restrictions on moorings in St. Catherines harbour.	No	No restrictions on moorings in St. Catherines are suggested in the plan, only the transition to eco-friendly moorings in seagrass areas.
JMSP-581511870	Economic development	<p>Would like to be able to seed areas within the new MPA network with smaller scallops to have accessible areas with good scallop abundance in bad weather.</p> <p>Onshore facilities are needed to help the scallop diving community - in particular a unit to process and store scallops, and a recompression chamber to allow for treatment of the bends on island</p>	No	Outside of scope of the JMSP

JMSP-581511871	Seabed protection	<p>I have been a Granville fisherman for 24 years. I have always navigated the waters of Jersey, as many generations of French fishermen before me did. This proximity, our common history and our shared values make me consider our two countries like two brothers who have forged a friendship for centuries. Since the 2000s I have been fishing in Jersey for shellfish with a dredge and fish with a trawl. After 20 years of common sea (la mer commune) and stability that suited everyone, Brexit was a hard blow .</p> <p>In addition to the lost fishing rights, it took me more than 2 years for my activity in your waters to be recognized and to finally obtain my fishing permits. These 2 years have been very hard for me, physically, financially and morally.</p> <p>For many years I have been fishing in Jersey in the same areas that I know by heart the reliefs and habitats present at the bottom. My sectors are: south-east and east of Minquiers, East Jersey and the Arconies.</p> <p>Contrary to what the maps indicate, there are no species of interest to protect in my fishing areas, there is only sand and live shells. I also observe that the practice of dredging on the bottom allows the sediments to be aerated, like a gardener who maintains his garden. This prevents the shellfish from dying, quite the contrary, this promotes the food supply and the regeneration of species. So I don't understand why there are these protection zones which systematically exclude mobile gear. As proposed, these zones would cause the end of many French fishermen and jersiais.</p> <p>I therefore hope that the environmental objectives will be adapted to the challenges and economics of traditional fishing. Jersey, my brothers across the way, receive my distinguished greetings</p>	Yes	<p>The suggestion that bottom towed fishing does not negatively impact the seabed at odds with the overwhelming scientific literature evidence and so is refuted. MPA boundaries have been revised where possible to take socio-economic impact into account. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.</p>
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JMSP-581511872	Seabed protection	<p>Contribution from Mr [REDACTED], ship [REDACTED]</p> <p>Good morning, My name is [REDACTED], I am the owner of the shellfish trawler [REDACTED]. We We have been fishing in Jersey waters for 37 years using trawls and scallop dredges. We trawl almost all year round in Jersey waters. We target sea bream in the spring and since Brexit we have lost ¾ of the fishing areas in Jersey for this species. The project as it is presented removes all fishing zones from me. I would like to remind you that the Sea bream fishing is done with a pelagic trawl, which has no impact on the bottom. We also trawl in the East and West Jersey, if marine protected areas are implemented, we will lose all our zones in the east. My family has been fishing in Jersey waters for at least 4 generations. We have seen fishing areas removed over the last 30 years. We are a traditional coastal boat, we cannot go offshore fishing. We lose fishing rights on a regular basis in your waters, initially under the pretext of protection of habitats with Ramsar sites, then it is a question of protection of sea bream with zones of nesting and now, the protection of 25% of your waters, and this whilst mentioning a future ban on mobile gear. I'm not even talking about the loss of rights caused by Brexit even though it was done within a Treaty supposed to guarantee us the ability to work "as before". The way these measures are presented, and the areas identified as future 'marine protected areas' it make me doubt the real merits of the approach: is it only a desire to protect habitats or is this an additional way to put pressure on the French mobile gear boats? Concerning the sites themselves, there are two areas which represent a strong economic challenge for me, they are shown in the maps below:</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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JMSP-581511872.2	Seabed protection	<p>I am the shipowner of [REDACTED], a fisherman from Gouville sur Mer. I mainly fish for whelks in the Le Boeuf sector and I also fish for shellfish: lobster and spiders. My activity in the waters of Jersey is quite border-line, I work near the Arconie plateau.</p> <p>In your document, I understand that the desire is to protect habitats and that the potters would be less affected. However, in the Sauvage sector, you are talking about banning them because the sectors damage the seabed. Is this a long-term project on the other MPAs?</p> <p>Prohibiting mobile gear in large sectors as you propose in your document will have big consequences. Many of us work between Jersey and France, we seek to cohabit in good conditions, respecting each other and ensuring that the material is respected. This became much more complex in 2021 when several colleagues lost their access to Jersey waters. I work a lot on cohabitation between ships, particularly between mobile gear and static gear vessels. Removing more areas for the mobile gear fleet will unbalance everything and this will have consequences on all ships. That will therefore also have a strong impact on our fishing strategies and our possibilities of rotation between the different areas.</p> <p>The proximity between Jersey and the Normandy coast is obvious, we are close neighbors. We therefore have the same issues, whether ecological or economic. As fishermen, we have always sought to ensure sustainable, environmentally friendly fishing. We are accustomed to taking action but only when justified. In the case of areas presented here, I ask myself the question: do we know if the habitats you wish to protect are in a good condition? is there an interest in protecting ecosystems that are doing well to the detriment of activities economics that have been in place for years?</p> <p>I feel like this is yet another way to keep us out of Jersey waters. It is difficult to understand when we see that exchanges between fishermen or with fishmongers are rather good. We have a long-standing common history. We have always worked</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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		<p>together and shared the sea. We must not forget that we are close neighbors, so it is important to take into account in your document and ensure exchanges between our two regions in order to guarantee our common interests. Best regards</p>		
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JMSP-581511873	Seabed protection	<p>I mainly fish for whelks in the Le Boeuf sector and I also fish for shellfish: lobster and spiders. My activity in the waters of Jersey is quite border-line, I work near the Arconie plateau.</p> <p>In your document, I understand that the desire is to protect habitats and that the potters would be less affected. However, in the Sauvage sector, you are talking about banning them because the sectors damage the seabed. Is this a long-term project on the other MPAs?</p> <p>Prohibiting mobile gear in large sectors as you propose in your document will have big consequences. Many of us work between Jersey and France, we seek to cohabit in good conditions, respecting each other and ensuring that the material is respected. This became much more complex in 2021 when several colleagues lost their access to Jersey waters. I work a lot on cohabitation between ships, particularly between mobile gear and static gear vessels. Removing more areas for the mobile gear fleet will unbalance everything and this will have consequences on all ships. That will therefore also have a strong impact on our fishing strategies and our possibilities of rotation between the different areas.</p> <p>The proximity between Jersey and the Normandy coast is obvious, we are close neighbors. We therefore have the same issues, whether ecological or economic. As fishermen, we have always sought to ensure sustainable, environmentally friendly fishing. We are accustomed to taking action but only when justified. In the case of areas presented here, I ask myself the question: do we know if the habitats you wish to protect are in a good condition? is there an interest in protecting ecosystems that are doing well to the detriment of activities economics that have been in place for years?</p> <p>I feel like this is yet another way to keep us out of Jersey waters. It is difficult to understand when we see that exchanges between fishermen or with fishmongers are rather good. We have a long-standing common history. We have always worked together and shared the sea. We must not forget that we are close neighbors, so it is important to take into account in your</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
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		document and ensure exchanges between our two regions in order to guarantee our common interests. Best regards		
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Organisation responses

Organisation responses are listed in alphabetical order of organisation name.

Case ID	Topic	Organisation Name	Comment	Action	Justification
JMSP-581511866	MSP	Action for Wildlife	<p>We are writing to you to highlight our support for the proposed Marine Protected Areas (MPAs) outlined in the Marine Spatial Plan (MSP).</p> <p>If implemented, the proposed network of MPA's detailed in the plan would represent a significant achievement. Having read the methodologies, we can see that the most valuable habitats have been carefully selected for whole-site protection, based on their importance in supporting biodiversity, fisheries and carbon. We feel that the MSP effectively reflects Jersey's responsibilities to the Global Biodiversity Framework (GBF) and its targets to reach 30 percent marine protection by the year 2030. With signatories reporting back to the CBD on their 30x30 progress at COP16 this year, we believe Jersey will have the opportunity to showcase how Jersey will achieve the targets, on an international platform.</p> <p>Priority NB5 in chapter 8.6 outlines suitable actions to meet the targets of the GBF by expanding Jersey's existing MPAs, where mobile fishing gear is not permitted, to 27 percent of territorial waters (including exclusion zones surrounding underwater power cables).</p> <p>We believe this would benefit the lower-impact, static forms of commercial and recreational fishing (which will be able to continue operating within MPA's), by ensuring the long-term health of key stocks such as crab and lobster (which make up approximately 70% of Jersey's annual fishery value).</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

			<p>Additionally protection of the proposed areas is likely to result in recovery and growth of nationally important habitats that serve as important nursery, spawning and feeding grounds. This should lead to a regeneration of habitats, an increase in biodiversity and greater resilience to storms and climate change. The numerous environmental, social and economic benefits are clear. We urge for the proposed MPAs to be delivered through the actions of priority NB5, resulting in 27 per cent of our waters being protected from mobile fishing gear.</p>		
JMSP-578877746	Conservation	Alderney Wildlife Trust	<p>We wish to primarily comment on Chapter 8, but our comments may also link to other chapters or other aspects of the JMSP, such as the Commercial Fishing and Aquaculture chapter (9). Fundamentally, we support the aim of chapter 8, that Jersey's natural environment is restored, and biodiversity is thriving. Please find our comments below</p> <p>i. No Take Zones (chapter 8, section 8.2.1, page 85)</p> <p>We support proactive actions which aim to protect valuable and vulnerable habitats and wildlife, such as the implementation and management of Marine Protected Areas (MPA). This includes the application of extreme measures based on sound evidence where necessary, such as 'No Take Zones' (NTZ). To ensure adequate protection from any adjacent/close by human activities, would a 'buffer zone' surrounding the proposed NTZ (e.g. Les Sauvages Reef) be considered? Adjacent high impact human pressures such as fishing, dredging, pollution and so forth may have the potential to damage habitats and wildlife indirectly through changes in water quality and turbidity. Therefore, could a small buffer zone surrounding any 'new' designation with the aim to further enhance the protection of valuable and vulnerable habitats and wildlife therein be an option?</p>	No	Les Sauvages NTZ already has a small buffer included but it is not practical to have a buffer to Portelet NTZ.
JMSP-578877746	Management	Alderney Wildlife Trust	<p>ii. Ramsar Sites (chapter 8, section 8.3.1, page 87)</p> <p>Given that the objectives of the JMSP is to develop a network of MPAs, it may be useful to highlight the locations of other Ramsar Sites throughout the Channel Islands and France, through spatial mapping, for background context.</p>	Yes	An extra sentence has been added to end of section 4.2.2.

JMSP-578877746	Admin	Alderney Wildlife Trust	<p>iii. Issues (chapter8 section 8.6.7, page 12)</p> <p>This section aims to summarise issues related to the vulnerabilities of Jersey's marine habitat and species and refers to the document: 'An Outline of the Ecology and Sensitivity of Marine Habitats in Jersey (2023) [Evidence Base document EB/NB/10]'. We feel that diseases/viruses (e.g. HPAI, diseases related to fisheries (e.g. necrotic shell disease)), aquaculture, coastal squeeze, freshwater input, coastal erosion and ocean acidification (derived from climate change impacts) are additional key issues and should be described or referenced further here, where appropriate.</p>	Yes	This was beyond scope to include in this particular Evidence Base document but an extra sentence has been added to section 8.6.7 in paragraph 1 to say that future iterations of the JMSP may consider other factors such as fish disease, water acidification and freshwater input.
JMSP-578877746	Admin	Alderney Wildlife Trust	<p>iv. Marine protected areas (chapter 8, section 8.6, page 116)</p> <p>Again, given that the objectives of the JMSP is to develop a network of MPAs, it would be valuable to map the locations of other adjacent MPAs, throughout the Channel Islands and France.</p>		Wider contextualisation of MPAs across the Normano-Breton Gulf is an objective of future iterations of the MSP. Jersey will continue to engage with neighbouring jurisdictions as future protected areas are developed.
JMSP-578877746	Seagrass	Alderney Wildlife Trust	<p>v. Priority NB6b: Seagrass habitat management areas (chapter 8, page 121)</p> <p>This priority describes the use of eco-friendly moorings as a conservation tool to help reduce the impact of physical damage from traditional moorings within seagrass habitat management areas.</p> <p>Other management conservation tools, in addition to the use of eco-moorings, within seagrass habitat management areas may be valuable. For example, the use of rope line (if eco-moorings are not available), the implementation of no anchoring zones or the deployment of seagrass marker buoys (to show where seagrass is present to marine users) could be considered.</p> <p>Engagement activities with boat/mooring owners and other marine users are also paramount. Therefore, will this priority also consider other options for seagrass restoration effort within seagrass habitat management areas, in addition to eco-moorings?</p> <p>In addition, as seagrass is vulnerable to human induced pressures such as physical disturbance from bait digging and reduced water quality (from freshwater run-off and nitrogen input etc.), will the seagrass habitat management areas include other management options for these issues?</p>	No	Restoration of seagrass has not been recommended due to seagrass expanding naturally in Jersey waters, but efforts are instead focussed on removing pressure from seagrass areas to protect the extent and health of seagrass beds, this will be addressed by action NB6a.

JMSP-578877746	INNS	Alderney Wildlife Trust	<p>vi. General chapter 8 points: Biosecurity management</p> <p>Chapter 8 references the document: ‘Invasive Non-Native Species: Challenges for the Water Environment (Environment Agency, 2021)’ and outlines issues related to specific marine invasive nonnative species (marine INNS), such as the American slipper limpet. Will the JMSP consider pro-active biosecurity management measures at an ecosystem-based level to help reduce new and established marine INNS, with the aim to help encourage a thriving marine environment? Are there other relevant biosecurity measures/relevant Jersey based marine INNS management plans that could be referenced within the chapter specifically? Marine INNS are a significant threat to thriving native species, communities and habitats. An ecosystem-based approach to manage marine INNS effectively may enable and be critical to the stated overarching aim of chapter 8.</p> <p>vii. General JMSP points: Other priority habitats/species management areas</p> <p>We support the pro-active conservation works associated with developing seagrass habitat management areas. As described in chapter 8, Jersey’s marine environment is home to a range of valuable and vulnerable habitats and wildlife. Therefore, will the JMSP (and subsequent works) consider similar priorities/management areas for other priority habitats and wildlife, such as developing rock-seaweed or maerl habitat management areas? Conversely, could this link to poor habitat types, such as marine INNS habitats, for example: the American slipper limpet habitat? Implementing direct management techniques/habitat management areas for a small number of priority habitats and wildlife may complement the wider scaled ecosystem-based approach to facilitate the main aim of chapter 8.</p>	No	<p>Spatial management is unlikely to have an impact on marine INNS due an inability to contain a marine invasive once it enters the system. Plans to manage marine INNS are being addressed by the Government of Jersey Biosecurity team. The proposed MPAs will contribute to an Ecosystem Based approach as it will protect large areas of seabed from mobile fishing that disturbs the seabed.</p>
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JMSP-578877746	International relations	Alderney Wildlife Trust	<p>viii. General JMSP points: transboundary plans/works, effects and impacts</p> <p>Does the JMSP refer to/or acknowledge other known transboundary plans/works and their impacts from, and on, adjacent territories? These may all have significant influences upon the JMSP and the island's marine environment. Examples include; marine spatial plans, specific marine species plans (e.g. conservation/ management plans for priority habitats and species) and fisheries management plans adopted in the other Channel Islands, France and the UK. In addition, will the JMSP take into consideration how Jersey based marine plans/works (including those works associated with the JMSP) will impact upon adjacent territories?</p> <p>It may be useful to consider/refer to, the potential transboundary effects of human activities (from those islands) upon Jersey's marine environment, such as adjacent fisheries, dredging, renewable/non-renewable energy works, other development plans and so forth. Will the JMSP also consider the potential transboundary effects of Jersey based marine activities and developments upon adjacent territories, including any effects upon their designated sites or valuable and vulnerable habitats and species?</p> <p>Due to the highly migratory nature (e.g. transboundary movements) of key species such as fish, marine mammals and seabirds (described in chapter 8), it may also be particularly valuable to refer to/or highlight such, within the JMSP. Considering transboundary effects may not only provide background spatial context to the document but also ensure the end use/purposes of the JMSP, rather than the plan being developed in isolation.</p>	No	Neighbouring jurisdictions have and continue to be consulted during the MSP process but Jersey does not have authority to establish protected areas outside of our territorial waters. Integration of the JMSP with neighbouring jurisdictions will be considered for future iterations.
JMSP-578877746	Admin	Alderney Wildlife Trust	<p>ix. General JMSP points: JMSP; adaptive spatial planning techniques in response to the climate crisis?</p> <p>Chapter 8 encompasses the key aspects of Jersey's marine environment such as designated sites and priority habitats and wildlife. This chapter also outlines threats from climate change, such as sea-level rise (chapter 8, page 113). In addition, other sections of the JMSP refer to the climate crisis, where appropriate (e.g. section: addressing climate change, page 12). We are encouraged to see climate change mentioned throughout the JMSP, particularly as such impacts have the potential to heavily influence all four of the plans' objectives/purposes (e.g. purposes of the JMSP, page 8). Therefore, will the JMSP plan be developed as an iterative, adaptive, coordinated spatial plan, able to cope with the growing direct and indirect pressures from climate change impacts (e.g. land-based flooding and coastal erosion impacts upon the marine environment)? Are there any other current or future plans to directly link to, in addition to the current/future Island Plan, specifically related to the ecological</p>	No	Future iterations of the JMSP will evolve in line with changing environmental conditions.

			impacts associated climate change? Perhaps the section on climate change (page 12) should be expanded and refer directly to appropriate actions/works cited within the appendix? Enabling the JMSP to adapt quickly enough using a coordinated ecosystem-based approach to the climate crisis may be vital to ensure the long-term viability of the island's thriving marine environment.		
JMSP-581511863	Fishing restrictions	Anglers	<p>1. Protection of Long-lived fish species from netting</p> <p>A buffer around the shore, particularly around the north coast, is needed to exclude nets and pots from obstructing recreational angling. There is also concern relating to species such as slow-growing and residential long-lived sport fish that are currently being caught in nets as by-catch. Imposing a buffer zone on nets close to shore would also mean that more Wrasse, amongst other species, will be available to be caught in catch and release fishing activity. A distance of 150 metres from the low water mark is requested.</p>	Yes	Action FA2e has been added to address issues of commercial potting and netting in close proximity to recreational angling spots.
JMSP-581511863	Fishing restrictions	Anglers	<p>2. Illegal fishing by Potters and Netters</p> <p>Pots placed where they shouldn't be, such as pots too close to the north side of St Catherine's breakwater and in designated Harbour areas are an issue for anglers. Illegally placed pots are not removed fast enough. This has been an ongoing issue for years. A wider buffer zone and moving the zone from the high water to low water mark will help. In addition, and in order to avoid costly inconvenience to the Coastal Patrol it would be suggested that both confiscation and £500 fines should be imposed on breaches of the rule.</p>	No	A new action (FA2e) has been added to review commercial fishing in proximity to angling sites. There is also another new action to improve signage in harbours (FA2f).
JMSP-581511863	Fishing restrictions	Anglers	<p>3. Protection of Bass</p> <p>An extension of the bass closed season (currently February and March) would allow for more to breed and the population to recover further; the current closed season ends when there are still 'roed-up' females. Whilst it is more likely business for the Fisheries Panel, it is captured here to note direction of travel. What should also be highlighted is the willingness of recreational anglers to support protection of Bass and other species when they are most vulnerable. Jersey is an important breeding area for Bass. Currently, Bass are being netted in January (before the 2-month ban comes into effect) fully 'roed-up'. They are also full of roe well into April and some actually spawn as late as May. In April they are in tightly packed shoals. In areas such as the northern reefs of St Ouen, the</p>	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.

			<p>shoals start breaking up towards the end of April and through May as they move back to feeding areas after spawning. This one month extra is where everyone will benefit most in the future.</p> <p>It is recommended that ;</p> <p>a) the netting ban should be extended by four weeks to the end of April.</p> <p>b) only catch and release should be permitted by recreational anglers during this time.</p>		
JMSP-581511863	Seabed protection	Anglers	<p>4. Mobile Gear Activity</p> <p>From a recreational angling perspective we are satisfied with the 'No Mobile Gear areas' as no dredging and trawling close to shore will benefit the recreational sector and ultimately the commercial fishermen through increased populations of species.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511863	Harbours	Anglers	<p>5. Clarity on Harbour Limits and sign-posting</p> <p>It is not widely known, by recreational anglers or the public, where the harbour limits are and it is also not well known who to contact if suspected illegal fishing is happening within the harbour limits. There is a general need to increase awareness and this could be achieved through signage with the relevant telephone numbers displayed and instructions as to what to do in the 3 main languages.</p>	Yes	There is a new action (FA2f) regarding improved signage in harbours to show harbour extents and therefore where potting and netting are prohibited.
JMSP-581511863	Seabed protection	Anglers	<p>6. No Take Zones expansion</p> <p>Whilst we agree with the principles behind them, we don't see the need for more 'No Take Zones' around the coast, but we do not oppose the offshore NTZ at Les Sauvages.</p>	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.
JMSP-581511863	Seabed protection	Anglers	<p>7. No Take Zones – C&R</p> <p>We propose that allowing recreational anglers the ability to Catch and Release would enhance the benefits to young anglers and visiting anglers alike. This would need to be strictly applied with no retention of damaged fish and stern financial fines for breaches of the rules or littering. Ultimately, should it become necessary to expand the NTZs, less resistance would be encountered should C&R be permitted.</p>	No	Catch and release will not be considered in No Take Zones as it is not possible to enforce. Catch and release is also a stressful event for the fish that are caught and is therefore not conducive to an area that is a sanctuary for marine life.

JMSP-581511863	Access	Anglers	8. Information Gathering on the extent and impact of Recreational Fishing. We propose that a repeat of the recreational fishing survey, last carried out in 2015, be conducted. The 2015 study does not take into account winter fishing spots and is now outdated. We recommend a review and update to this survey so that there is more detailed spatial information regarding recreational fishing. The take by anglers is suspected to be considerably lower than previous assumptions, which may simply have extrapolated take numbers from a handful of anglers to the entire fishing population, most of whom catch little or take nothing apart from Mackerel.	Yes	A reference to recreational fishing has been added to action RT2d.
JMSP-581511863	Access	Anglers	9. Access to traditional and recreational fishing areas Concerns over access to beaches/parking permits. There is a priority in the Marine Spatial Plan to review the current system and there are concerns that this may limit access to recreational fishers and/or limit trailers on beaches. How would these permits be allocated?	No	The way in which permits would be allocated cannot be addressed by the JMSP and will be down to relevant authorities to action.
JMSP-581511863	Disturbance	Anglers	10. Bird life protection against harmful netting practices Currently netting is conducted at any time of the day and concentrated during daytime hours when seabirds are active, especially dawn and dusk. By-catch of seabirds is well known and the seizure of a net at St Brelade's Bay by the JSPCA with large numbers of by-catch birds was evidence of the damage wrought by current netting practices. JNCC Report No. 717 (https://data.jncc.gov.uk/data/dbed3ea2-1c2a-40cf-b0f8-437372f1a036/jncc-report-717.pdf) suggests methods to avoid bird by-catch. We propose that netters should limit setting of their gear after sunset and remove it before dawn. Overnight netting should also largely prevent Ballan Wrasse by-catch.	No	This will be addressed by priority FA2.
JMSP-581511863	Fishing restrictions	Anglers	11. Ballan Wrasse C&R It has long been recognised by the recreational angling community that Ballan Wrasse are slow to grow, long-lived and highly residential. Once one is removed it is not replaced quickly. Sadly, in recent years they are getting killed in gill nets, they have been exported for use in Scottish Salmon farms to manage sea-lice populations and, more of a problem, they are a readily available source of bait for pots. Wrasse anglers have noticed the decline in numbers and size and it would be helpful to protect the species with a Catch and Release policy. Both of the main recreational fishing clubs have embraced the C&R idea and there is also a Wrasse C&R competition. In addition, the Jersey Open Angling Festival	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.

			only allows Ballan Wrasse to be measured and released, not brought to the scales.		
JMSP-581511863	Fishing restrictions	Anglers	<p>12. Blue fin Tuna</p> <p>Numbers around the islands have expanded rapidly in the past few decades given climate change and perhaps better protection and management of the Herring, Sardine, Mackerel and other pelagic species. We see that the EU are permitted a quota and the UK are also progressing their own policy in this direction. Now would be an opportune time to allow Jersey Recreational anglers to share part of any UK quota. This would be of particular interest to visiting anglers who will pay very good money to fish for the species. For example, a sportsfishing boat in Madeira commands around £1,250 per day. Minimum size of retention will need to be observed but thought will need to be exercised on the release of fish after 45 minutes on the hook as survival rates are low after prolonged battles.</p>	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.
JMSP-581511863	Fishing restrictions	Anglers	<p>13. Bass Protection by increasing size limit (minimum length)</p> <p>In addition to setting nets overnight we also recommend an increase in the size limit. At 42cm not all Bass will spawn, it's when they get to 45cm+ that nearly 100 percent of the species will spawn. The combination of extension of the out of season by a month and increase in minimum size will assist the species population. Obviously, some thought will also need to be given to changes in net mesh sizes if the minimum length is to be observed and research has already been undertaken by Fisheries into the impact of mesh sizes on both impact on Bass and also by-catch.</p>	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.

JMSP-581162591	Seabed protection	Blue Marine Foundation	<p>Jersey is a signatory to a number of international conventions which oblige it to protect its marine environment. Examples include the '30 by 30' target (i.e. Target 3 which outlines 30% of terrestrial and marine environments by 2030) agreed at the 2022 Kunming-Montreal Global Biodiversity Framework, and the OSPAR Convention, which identifies a series of threatened habitats and species which should be protected. The GBF includes 196 countries as signatories, it is a historic agreement and Jersey would show world leadership by protecting 30% of its waters by 2030.</p> <p>FA1 Fully support proposed 27%. However, to meet commitments this should be increased to 30%.</p> <p>Full text of target 3 of the GBF: Ensure and enable that by 2030 at least 30 per cent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories. Blue Marine proposes:</p> <p>1) Inclusion of the area between Les Anquettes/SE and the Minquiers to provide connectivity, and protect a large area of kelp that is not protected under the current proposed MPA coverage. From fishing patterns outlined in the draft MSP, this area is not subjected to mobile fishing gear and therefore displacement of local vessels would be minimal.</p> <p>2) Include a large area of maerl NE of the proposed Minquiers MPA extension which is currently not protected under proposed plans.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581162591	Financing	Blue Marine Foundation	<p>The draft JMSP lacks a detailed budget and financing plan for its potential delivery. Funding for the delivery of MSPs often come from the governing authority. However, the Government of Jersey has an opportunity to explore sustainable financing models such as credit structures including nature positive biodiversity credits, investment from private finance such as tourism and user fees, and loan/debt structures. These have proven to contribute to marine spatial planning and delivery of MPAs.</p>	Yes	An extra sentence has been added to section 1.2 to highlight the need to secure resourcing for many of the priority and action points. See also Appendix A.

			<p>Blue Marine propose that a financing strategy for the delivery of the JMSP is developed.</p> <p>Blue Marine proposes the addition of the following commitment in the final JMSP: To deliver the JMSP, the Government of Jersey will explore avenues of sustainable financing mechanisms to secure the long-term funding for sustainable marine use and management, such as biodiversity monitoring, financial support for small scale, low impact fishing and compensatory measures for displaced fishing.</p>		
JMSP-581162591	Seabed protection	Blue Marine Foundation	<p>NB1a-c One NTZ already exists in Jersey territorial waters allowing monitoring of changes to ecological health after removal of fishing, and how the local marine environment reacts to environmental change where other pressures are removed.</p> <p>NTZs are well documented to significantly improve fish biomass through the restoration of complex habitats and ecosystems. While this results in ecological benefits within local and surrounding areas, NTZs have also shown to have a positive impact on local economies through improved fisheries and ecotourism.</p> <p>It should also be noted in Chapter 8.2.1 of the draft MSP that Blue Marine have never recommended for Les Sauvages to be a NTZ. Evidence Base Document EB/NB/11 clearly recommends for the site to be 'considered for further protection and robust fisheries management approaches are proposed, consulted upon and delivered.'. This should be clarified in the relevant section of the JMSP.</p> <p>Blue Marine formally requests a change to the wording on p85 from 'Three additional areas have been proposed for NTZs in the consultation for this MSP: Les Sauvages Reef (south-east of Les Minquiers) (proposed by Blue Marine);...' to, 'Les Sauvages Reef (south-east of Les Minquiers) has specifically been recommended for further protection (based on evidence which shows significantly high levels of biodiversity). Additionally, two areas have been proposed for NTZs: Archirondel and Anne Port Bays...'</p>	Yes	The text in section 8.2.1 has been updated.

JMSP-581162591	Seabed protection	Blue Marine Foundation	<p>Based on evidence from research in Jersey and other locations in the UK, protection of the proposed areas from trawling and dredging are expected to result in recovery and expansion of nationally important habitats. These areas also serve as important nursery, spawning and feeding grounds, and protection in this form would lead to an increase in biodiversity, and increased resilience to storms and climate change. The increase in biodiversity as a result of MPA implementation is also expected to benefit the local fishing industry through increased abundance of commercially important stocks).</p> <p>1) The final sentence of Action NB5a should be amended to: 'No mobile fishing gear or destructive/ damaging development will be permitted to be used/take place within MPAs.</p>	Yes	The text has been amended accordingly.
JMSP-581162591	Economic development	Blue Marine Foundation	<p>NB5 The implementation of MPAs can also have significant economic benefits through the delivery of ecosystem services. As part of the consultation, Blue Marine submitted an Ecosystem Service Valuation (ESV) referred to as 'Evidence Base document EB/NB/9' in the draft JMSP. This model has now been updated (report attached with the submission of this response) with the JMSP MPA scenario, calculating revised net estimates for a net ecosystem service impact value of £1.6m, £9.6m and £27.8m over a 5-, 10- and 20-year period respectively after designation. These numbers reflect the net impact after considering the cost of lost fishing which was estimated to be £15.9m, £44.4m and £104.2m over a 5-, 10-and 20-year period respectively.</p> <p>While the net impact may be positive over the longer term, stakeholders affected (both economically and socially) by displacement from traditional fishing grounds due to the introduction of MPAs need support to make a just transition. To assess the impact and identify and fund appropriate and proportionate measures to support this transition, a socioeconomic impact assessment is needed. This should not delay statutory introduction of the MPAs, but must be initiated at the soonest possible time. Following the socio-economic impact assessment, dialogue with the fishing industry is needed to identify the most effective, equitable and proportionate support measures to enable a just transition.</p> <p>Blue Marine has commissioned a study to better understand the costs and benefits of a just transition for UK inshore fisheries. The study considers realistic options to replace existing destructive fishing practices with lower-impact marine activities. A framework is being developed that can be applied to demonstrate the social, economic and environmental impacts of transition</p>	Yes	An extra sentence has been added to section 8.6.9 paragraph 8 and a new action (NB5d) regarding compensatory measures and/or alternatives for affected fishermen within the mobile fishing sector impacted by the designation of MPAs.

			<p>options. This will be published in March 2024 and could be very relevant for the Government of Jersey to consider.</p> <p>2) Priority NB5 should include an additional Action as follows: 'Action NB5d: A comprehensive socio-economic impact assessment will be carried out immediately. Following outputs, fair compensatory measures and/or alternatives will be provided to affected fishermen within the mobile fishing sector impacted by the designation of MPAs.'</p>		
JMSP-581162591	Seabed protection	Blue Marine Foundation	<p>NB5a A comprehensive MPA monitoring programme should be integral to the delivery of priority NB5 as this is necessary to provide accurate assessments of the performance and impact of implementing MPA management measures and inform adaptive management.</p> <p>The efficacy of MPAs is known to increase if well enforced. Therefore, an enforcement regime must be designed and delivered alongside any MPA designations.</p> <p>3) Priority NB5 should include an additional Action as follows: 'Action NB5e: An enforcement and biodiversity monitoring programme will be established to ensure compliance within MPAs and understanding of their ecological impact.'</p>	Yes	A new action has been added (NB5f) to cover monitoring of MPAs.
JMSP-581162591	Seabed protection	Blue Marine Foundation	<p>NB5b Statutory legislation for marine management has historically proved to achieve better results when compared to voluntary MPAs.</p> <p>It is important to clearly state the timeframe for introduction of this legislation and Blue Marine believes that this should be by January 2025.</p> <p>Jersey's responsibilities under the Global Biodiversity Framework (GBF) are clear. As the Government of Jersey chose to have the UK's signature to the United Nations Convention on Biological Diversity extended to itself in 1994, Jersey has a clear responsibility to reflect relevant frameworks in local policy. This therefore includes 30 per cent marine protection by 2030 (30x30), as outlined in target three of the GBF.</p> <p>Proposed amendment to Action NB5b: "Legislation will be revised to give the MPAs a statutory basis by January 2025".</p>	Yes	<p>The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.</p> <p>Immediate timelines cannot be decided within the JMSP.</p>

JMSP-581162591	Seagrass	Blue Marine Foundation	<p>NB6a Seagrass is a highly important habitat, supporting high biodiversity, spawning and nursery grounds for commercial fish and drawing down and storing carbon. Nearly 97 percent of Jersey's existing seagrass beds already lie within the existing MPAs and are therefore protected from trawling and dredging. However, a significant number of boat moorings are known to cause damage, resulting in an estimated 6000m2 of seagrass being lost to date. The potential natural recovery and expansion of seagrass beds achieved by restricting damaging activities such as anchoring in the proposed areas would boost local marine biodiversity as well as mitigate the impacts of climate change. These actions would also further contribute to Jersey's Carbon Neutral Roadmap ambition to double the extent of seagrass habitats.</p> <p>Proposed revision to Action NB6a: 'Seagrass Habitat Management Areas will be established in...'. Proposed revision to action NB6b: '..., such moorings will become required, with legislation introduced to ensure mandatory use within Seagrass...'</p>	No	Terminology within the JMSP is advisory not policy
JMSP-581162591	Fishing restrictions	Blue Marine Foundation	<p>FA1a It is likely that tiered systems like this will help to provide clarity and resolve conflicts between different fishing activities and other marine uses/values such as development, recreation, biodiversity and blue carbon. Proposed amendment to Fishing Zone A: 'Fishing zone A (Lightly (remove the word lightly) Regulated Fishing Area)'</p>	Yes	The terminology of fishing areas have been changed. In addition, 'fishing areas' are now referred to as 'fishing zones' throughout.
JMSP-581162591	Fishing restrictions	Blue Marine Foundation	<p>FA1a The MSP lacks management for recreational fishing and should consider developing a recreational fishing code/guidance document to help promote best practice.</p>	Yes	Action RT6a refers to a Seaside Code, now with a specialist supplement for recreational/low water fishing.
JMSP-581162591	Aquaculture	Blue Marine Foundation	<p>FA1a The JMSP does not outline suitable areas for potential sustainable aquaculture/phyticulture. Aquaculture farms (including bivalve and seaweed farming) can play a significant role in cycling nutrients, creating habitats and nursery grounds to promote recruitment of fish, and generate economic growth through production and employment. Areas for these activities should be</p>	No	Outside of the scope of the JMSP - it is not possible to predict future aquaculture needs to be able to define a zone.

			<p>outlined in the JMSP and supported by updating existing regulations and frameworks.</p> <p>Additional proposed fishing zone: 'Fishing Zone D (Sustainable and Innovative Aquaculture)'</p>		
JMSP-581162591	Seabed protection	Blue Marine Foundation	<p>FA1a It is vital for fisheries regulations to be updated in line with new management measures. This will help to ensure enforcement of new measures such as MPAs. Regulation measures should be updated and implemented before January 2025 and necessary discussions on mitigating impact on displaced fishermen should start as soon as possible.</p> <p>Proposed amendment to Action FA1a: "Fisheries regulations will be updated by January 2025 to reflect the new area-based system, following the standard process with regard to consultation."</p>	Yes	The Fishing Zones will be implemented through the MPA and NTZ designations. It is not possible to determine the year ahead time table of the States Assembly.
JMSP-581162591	Fishing restrictions	Blue Marine Foundation	<p>FA1b As Jersey's waters experience fishing from the local commercial fleet, the French commercial fleet and a significant local recreational fishing sector, engagement with these three stakeholder groups is key to ensure compliance.</p> <p>In addition to engagement with the commercial fishing sector, the MSP should include engagement with the recreational fishing sector and the development of a recreational fishing code of conduct to mitigate environmental impact of this fishing sector.</p> <p>Proposed amendment to action FA1b: "...undertaken with the Jersey and French fishing fleets and recreational fishing sector to make sure that all are aware of the new system."</p>	Yes	Action FA1b has been amended accordingly.

JMSP-581162591	Economic development	Blue Marine Foundation	<p>FA5a Existing barriers such as cost, infrastructure and marketing can hinder achieving a thriving economically and environmentally sustainable fishing industry. Jersey's 'Genuine Jersey', 'Genuine Jersey Line Caught Bass' and 'Jersey Hand Dived' are all good examples of a sustainability mark. Lyme Bay is a very good example of how measures such as installing ice machines and chiller units in ports can maintain freshness of catch and thus ensure competitive market prices.</p> <p>Proposed amendment to Action FA5a: '...sustainably-caught fish will be promoted by the creation, auditing and enforcement of a sustainability mark...'</p>	No	Outside of the scope of the JMSP. The recommendation FA5 to promote sustainable fishing is an appropriate level at this stage.
JMSP-581162591	Economic development	Blue Marine Foundation	<p>FA5b Grant schemes such as the UK Government's Fisheries and Seafood Scheme managed by the MMO in the UK has provided vital support for the fishing community to develop the necessary infrastructure and innovations to improve the quality of catch and marketing.</p> <p>Proposed amendment to Action FA5b: '...onshore facilities, such as ice machines, chiller units and processing hubs, for sustainable fishing will be encouraged and given financial support from the government.'</p>	No	Outside of the scope of the JMSP. The recommendation FA5 to promote sustainable fishing is an appropriate level at this stage.
JMSP-581162591	Economic development	Blue Marine Foundation	<p>FA5c Promotion of sustainable fishing can also be achieved through exploring methods of transition away from damaging fishing methods, as well as diversification away from target species and efforts to reduce carbon emissions.</p> <p>Transition to sustainable fishing methods could also lead to an increase in GDP, employment and stocks. In the UK, this has previously been estimated to generate £319 million, 5,100 new jobs and 30% more fish.</p> <p>Proposed additional action: 'Action FA5c: The development of initiatives and incentives to support a just transition to fishing practices that have least impact on the seabed, non-target species and emissions.'</p>	No	This will be addressed by priority FA5. Further economic support will be addressed through the Marine Economy Framework.
JMSP-581162591	Access	Blue Marine Foundation	RT3a Accessibility for all user needs is crucial in maximising the Island's community connection with the sea.	No	Terminology within the JMSP is advisory not policy

			Proposed amendment to Action RT3a: '....Opportunities will be sought to improve access...'		
JMSP-581162591	Access	Blue Marine Foundation	<p>RT3b Organisations such as Blue Marine, Societe Jersiaise, Jersey Marine Conservation, National Trust for Jersey, Bouley Bay Dive Centre, Jersey Heritage, Healing Waves, Jersey Kayak Adventures, Seafaris and many others are all undertaking effective ways of connecting people to the sea, resulting in enhanced education, awareness and appreciation of the marine environment. However, monitoring of recreational activity within the marine environment is necessary to ensure sustainable use and to minimise human impact.</p> <p>Proposed additional action: 'Action RT3d: A monitoring programme will be developed and implemented to assess and manage any impacts of changes in accessibility and added infrastructure.'</p>	Yes	An extra sentence has been added to section 11.3.3 to highlight the need to monitor levels of recreation to provide baseline information on recreation patterns and whether they are changing. An additional action has been added (RT2d).
JMSP-581162591	Access	Blue Marine Foundation	<p>RT3c The reduction of transportation needs will likely increase accessibility while reducing emissions of these activities. Suitable locations and designs can be regulated and managed by existing resource in the planning department.</p> <p>Proposed amendment to Action RT3c: '...at the coast will be promoted in order to... Guidance will be produced...'</p>	No	Terminology within the JMSP is advisory not policy.
JMSP-581162591	Beach management	Blue Marine Foundation	<p>RT6a-b Recreation is a significant and popular activity that takes place across Jersey's coastlines, seas and offshore reefs. Inherently, these activities can also negatively impact sensitive marine habitats.</p> <p>Recreational fishing can generate significant littering issues if unmanaged and the Government of Jersey should commit to develop and promote a Code of Conduct for recreational shore and sea anglers to promote best practice.</p> <p>Seaside codes can work well in unison with safety guides. A combination of the two may streamline the process of both actions and simplify for user engagement.</p> <p>Recommendation that the "Enjoying the Coast Safely" is combined and expanded to include the Seaside Code to create a Seaside and Safety Code to promote enjoyment of the coast safely and sustainably.</p>	Yes	This has been added to action RT6b to consider a subsection on recreational fishing in any revisions of the booklet.

			Proposed additional action: 'A specific Code of Conduct will be produced for recreational shore and sea fishing.'		
JMSP-581162591	Beach management	Blue Marine Foundation	<p>RT7a The Ramsar Management Authority already balance the opinions and needs from multiple users across the offshore reefs and should therefore be regarded as a key contributor to the Holistic Management Plans for the reefs.</p> <p>Proposed amendment to action RT7a: '...Holistic Management Plans for the reefs will be produced with users, the Ramsar Management Authority, and Residents' Associations...'</p>	No	Terminology within the JMSP is advisory not policy.
JMSP-581162591	Seabed protection	Blue Marine Foundation	<p>IT1a-e The recent classification of OECMs contributing to the global MPA network could allow any submarine cable protection zones to contribute toward Jersey's total MPA coverage. Although the reason for classification as an MPA is not for its environmental contribution, these protection zones will likely result in improvement of biodiversity, habitat regeneration and MPA connectivity to the surrounding marine ecosystem.</p> <p>Proposed additional action: 'Action IT1d: Any areas around submarine cables designated protection from mobile fishing gear and anchorage will be put forward to the UNEP-WCMC (UN Environment Programme World Conservation Monitoring Centre) to be officially recognised as OECMs (other effective area-based conservation measures).'</p> <p>Proposed amendment to Action IT1b: '...telecommunications cable, will be created...'</p> <p>Proposed amendment to Action IT1b: '...telecommunications cable, will be created...' Proposed amendment to Action IT1e: '...existing cable routes in accordance to best environmental practice to mitigate ecological damage.'</p>	Yes	<p>First proposition is outside of scope of the JMSP but will be addressed through fisheries management if appropriate.</p> <p>Terminology within the JMSP is advisory not policy.</p> <p>Action IT1e has been amended accordingly.</p>

JMSP-581162591	Deposition	Blue Marine Foundation	<p>IT3a-b The deposition of substances such as construction materials, dredged materials, fish waste and burials at sea can have a significant negative impact on the marine environment and surrounding wildlife.</p> <p>Suspended sediment from the deposition of large quantities of dredged spoil and sediment can affect kelp and seagrass growth and an assessment of the potential impacts of further deposition at existing or any new FEPA sites on the Seagrass Habitat Management Areas and MPAs should be undertaken as part of the licencing process to avoid impacts on protected features and habitats.</p> <p>Proposed additional action: 'Action IT3c: Any changes in the location and size of the FEPA offshore deposition site will be considered in light of an assessment of the potential impacts on any designated MPAs and Seagrass Management Areas.'</p> <p>Proposed amendment to Action IT3b: '...current legislation will be undertaken...'</p>	No	<p>An expansion is unlikely and any expansion of a FEPA deposition ground requires a planning application from Marine Resources and would include an Environmental Impact Assessment.</p> <p>Terminology within the JMSP is advisory not policy.</p>
JMSP-581162591	Renewable energy	Blue Marine Foundation	<p>IT4a There are several environmental impacts associated with offshore wind farm developments, including bird strikes and direct impacts on benthic habitats and pelagic species (e.g. disturbance to migration routes)³⁷. There are also socioeconomic impacts such as displacement of fishing, which will likely reduce the area available for mobile gear fishermen (additional displacement as a result of MPA designation).</p> <p>While the JMSP is not the appropriate avenue for the consultation of offshore wind development, it is important to have consenting frameworks in place to ensure best practice. Blue Marine has been exploring the opportunities for nature restoration in Offshore Wind Farms across the UK and has developed a decision tool to allow feasibility recommendations for both passive and active (i.e., utilising nature inclusive design) restoration approaches to be made. The utilisation of this tool should be considered by the Government of Jersey and associated developers to promote nature recovery as a key part of any development, contributing to 30 x 30 targets set out in the Kunming-Montreal Global Biodiversity Framework. The tool could also help facilitate passive approaches in terms of Offshore Wind Farm site identification potentially being placed in an area that promotes nature enhancement through defacto protection.</p> <p>Proposed amendment to Action IT4a: '...The following requirements will be considered in...- best practice in marine conservation, with a focus on restoration opportunities including Nature Inclusive Designs (NIDs);- additional</p>	Yes	<p>Nature Inclusive Design (NID) has been added to action IT3a (formerly IT4a). NID has also been added to the glossary.</p>

			<p>economic...'</p> <p>Proposed additional action: 'Action IT4b: Two working groups will be established consisting of: (1)Conservation specialists to ensure best practice; and (2) Fishing sector representatives, to discuss appropriate measures to mitigate any impacts of displacement.'</p>		
JMSP-581162591	Renewable energy	Blue Marine Foundation	<p>IT5 With the proposed offshore wind development to the SW of Jersey's territorial water with the potential of an energy supply six times the amount of current island usage, further renewable energy may not be necessary. However, tidal power (in the form of barrages as being explored in St. Aubin's Bay) has proven to have adverse effects on the marine environment, and mitigation of this should remain at the forefront of any investigations.</p> <p>Proposed amendment to Action IT5a: '...with sea defence. Active engagement with environmental specialists will remain at the forefront of scoping work.'</p>	Yes	The potential for adverse ecological impacts is already covered in the text (12.6.2 (formerly 12.7.2) paragraph 2). 'Subject to appropriate environmental impact assessments' has been added to IT4a (formerly IT5a).
JMSP-581162591	Infrastructure	Blue Marine Foundation	IT9 A maritime hub in Jersey could provide logistical support for marine activities, undertake research to better inform management, accommodate suitable infrastructure such as a hyperbaric chamber, as well as catering for other activities. Blue Marine and the National Trust for Jersey have discussed similar proposals and on request, are happy to provide the Government of Jersey with information that may be helpful in exploring the development of a maritime hub.	No	General comment of support.
JMSP-569676616	Seabed protection	Bouley Bay Dive Centre	Having read the relevant chapters 8 and 9, I think the aims are good and build on what is already shown to be working.	No	General comment of support.

JMSP-581511874	Engagement	CPRMEM Brittany	<p>The CRPMEM appreciates the clarity of the documents submitted for consultation and on which this opinion is based. It considers that these documents provide an enlightening vision of the guidelines for the protection and enhancement of the environment, as well as for the development of activities envisaged in the marine area of the Bailiwick. It regrets, however, that the documents underpinning the arguments developed in the draft report submitted for public consultation are not available. This makes it impossible to assess the scientific basis for the proposed protection measures and restrictions on activities such as professional fishing.</p> <p>The CRPMEM appreciates the fact that the Jersey's planning process is taking place at a time when France is undertaking a major public debate on this issue. The CRPMEM points out, however, that the French waters adjacent to the Bailiwick are already covered by planning documents (Documents Stratégiques de Façade) adopted in particular under Directive 2014/89/EU. Taking them into account in the JMSP would have been an added value, particularly in terms of the coherence of public planning policies in the Golfe Normand Breton, and as an ecological entity in its own right. Similarly, the dossier submitted for consultation does not enable us to assess the stakes for French professional fishing in the context of the Jersey's planning process. In particular, the presence of French fishermen in Jersey waters appears too anecdotal through the rights put in place after the Brexit.</p>	No	<p>While the evidence base documents were not available online during the consultation they were available on request. The documents will also be published alongside the post-consultation version of the JMSP. Marine management measures will continue to be discussed with French representatives but it was outside of the scope of the JMSP to include French planning document information at this stage. An ambition for both France and Jersey should be to work at a wider scale and context as marine plans develop.</p>
JMSP-581511874	Seabed Protection	CPRMEM Brittany	<p>About the management of fishing activities to protect the environment :</p> <p>The JMSP proposes the introduction of a three-tiered framework for the specific supervision of professional fishing activities aimed at protecting the marine environment and the resources dependent on it. This framework proposes to establish a supervisory regime that goes beyond the current regulatory framework. The CRPMEM regrets the failure to take into account the activity of French vessels in the description of current fishing trends in Jersey waters. No assessment of the socio-economic impacts of these three new regimes has been carried out within the framework of the JMSP. The CRPMEM demands that this aspect be considered before any decision is taken on regulatory changes, and asks that this assessment be coordinated with the French authorities and consulted with all stakeholders. It is at the disposal of the authorities to provide its expertise on the activity of the Brittany's fleets, but also on the state of fishery resources in the waters of the Normano-Breton Gulf.</p> <p>The CRPMEM questions the merits of the proposed ban on dragging in submarine cable sectors, and calls for it to be withdrawn from the JMSP. Over and above the socio-economic impact, which has not been assessed within the framework of the JMSP, but whose negative consequences for the activities of</p>	Yes	<p>The assessment of French fishing effort had been assessed through VMS data, this has now been made clear in the text of the fishing chapter (section 9.3.2) and the methods used to create the spatial effort maps can be read in the evidence base document. The MPA boundaries have been adjusted following the consultation to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. A Business Impact Assessment will be carried out on the final proposed MPA boundaries. Wider study and partnership working will take place ahead of implementation of spatial management measures that impact fishing, French representation in</p>

			French vessels are obvious given their location and geometry, the CRPMEM questions this measure on two counts. The first is linked to the history of submarine cable installation, which was completely buried precisely to enable the maintenance of dragnet activities. The second is linked to the objective of protecting the seabed. While the extension of the boundaries of the Marine Protected Areas appears to be well founded on scientific grounds, there is no scientific justification for banning dragging in these areas. The information presented on the habitats of interest and justifying their protection does not mention these sectors as being of particular ecological interest. The CRPMEM reiterates its willingness to take into consideration feedback from the Saint-Brieuc project, and to draw inspiration from the procedures implemented to minimize the impact on fishing activities.		this process will be sought. Action IT2b regarding protection of the Guernsey electricity cable has been updated.
JMSP-581511874	Renewable energy	CRPMEM Brittany	<p>About the offshore wind farm project in the southwest sector of Jersey waters :</p> <p>By the end of 2024, France has undertaken to draw up a spatial plan for the development of offshore wind power between 2035 and 2050. Given this planning context, the CRPMEM is asking for this process to be truly integrated at the scale of the Normano-Breton Gulf. The proximity of the Saint-Brieuc Bay wind farm and French waters likely to host new MRE projects calls for a fully integrated approach to this development. To this end, consideration should be given to setting up bilateral exchanges with the French authorities as part of a regional dialogue on the subject (in particular on the aspects of siting, connection and consideration of environmental, socio-economic and cumulative effects). As stated in the methodology, the JMSP principle requires that "the needs of stakeholders be taken into account".</p> <p>The deployment of MREs in Jersey waters carries the real risk of further undermining the fishing capacity of French vessels in the sector, capacity already largely undermined as a result of the Brexit agreement in Channel Island waters and the siting of the Saint-Brieuc wind farm in French waters. Professional fishermen and the scientific community have also repeatedly pointed to the lack of knowledge about the direct and indirect impacts of marine renewable energy deployment on fishery resources and the environment. Aspects such as habitat disturbance and loss, changes in current patterns, disruption of species' biological cycles, noise/electromagnetic fields/vibration, discharges into the environment due to infrastructure maintenance, etc., are still being questioned and/or need further investigation. The CRPMEM requests that the approach to deploying MREs in Jersey waters considers and integrates the feedback from the Saint-Brieuc Bay project on the one hand, and on the other, respects the commitments made in the Trade and Cooperation Agreement (article 502 of the</p>	No	Outside of scope of the JMSP - while the information provided is very detailed, it cannot be included in the revised version of the JMSP as the plan does not go into the detail of a windfarm and Jersey is in the early stages of investigating offshore renewables. However, now that the proposal to investigate a windfarm (P82-2023) has been approved, the submitted report from CRPMEM Brittany will be passed onto the windfarm team to inform the subsequent stages. Neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."

			<p>TCA) concerning the commitment of each party to authorize the vessels of the other party to fish in its waters with constant effort in relation to the reference period 01 02 2017 and 31 01 2020.</p> <p>The CRPMEM would like to point out that the Avoid Reduce Compensate (ERC) approach has long been adopted in MRE projects in France and many other European countries. This approach ensures that the effects of projects (particularly cumulative effects) are taken into account, that their impact is assessed and that decisions are taken to minimize, reduce and, where necessary, compensate for them. The CRPMEM calls for a coherent approach, particularly in a sector where the marine environment, fisheries resources and socio-economic activities affected by different projects are shared.</p> <p>A number of points relating to the Jersi wind farm project need to be clarified, in particular with regard to the consideration given to professional fishing activities. While the JMSP states that additional economic benefits will be studied (particularly seaweed farming), the subject of other activities such as fishing is not mentioned. The CRPMEM points out that coactivity with fishing activities prevailed for the Saint-Brieuc windfarm park, resulting in numerous exchanges with government departments and project developers in order to integrate the maintenance of activities into the architecture of the project, right from the earliest phases of the administrative procedures.</p>		
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JMSP-581511869	International relations	CRPMEM Normandy	<p>Jersey and Normandy are strongly linked by history. We were separated in 1204 when France regained possession of Normandy, forgetting the Channel Islands. However, our destinies have always been linked. Norman origins are also very marked in Jersey. In addition, there is the obvious geographical proximity between both regions. At its closest, Jersey is only 12.03 nautical miles (22.2 km) from the French coast.</p> <p>This proximity has meant exchanges between fishermen for almost two centuries. Several agreements have already been signed: a source of numerous discussions. The latest one was the Granville Bay Treaty which had the particular objective of establishing common management measures concerning fishing in this area.</p> <p>In the JMSP it is mentioned that this planning exercise will enable Jersey to fulfill its international obligations. In this paragraph, the obligations mentioned concern only the environment, including the 30x30 principle. We would like to remind you that Jersey is also committed to respecting the historic and pre-Brexit fishing rights of French vessels via a new post-Brexit agreement, the Trade and Cooperation Agreement (TCA). In this context, Jersey is committed to ensuring that there are no discriminatory measures and to ensuring that activities are maintained as they existed before Brexit. It therefore seems essential to us that the definition of the network of marine protected areas is done in consultation with French fishermen to ensure they are appropriately taken into consideration.</p>	Yes	<p>The MPA boundaries have been adjusted following the consultation to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. The current methods used are in line with the requirements of the TCA and the precautionary principle. Any changes to mobile gear access will follow the processes set out in the TCA. Wider study and partnership working will take place ahead of implementation of spatial management measures that impact fishing, French representation in this process will be sought.</p>
JMSP-581511869	International relations	CRPMEM Normandy	<p>*Translated text* The CRPMEM of Normandy notes that Norman fishing activities are barely considered in the definition of the proposed network of marine areas. Likewise, the impact and socio-economic consequences of such a network of MPAs on Norman fishermen, in Normandy territory, are not raised. As cited in the MPA Assessment Methodology (Evidence Base document EB/NB/12), since spring 2023, 5 workshops were organized to consult stakeholders identified as essential to the deployment of the JMSP. We deplore that Norman and French fishing, historically present, have not been considered as an important stakeholder. We are all the more dumbfounded as during the consultation workshops, 100% (17/17) of the opinions on the question</p>	Yes	<p>While French stakeholders were not involved in the scoping stages of the consultation (which were to understand what the Jersey community wanted the MSP to deliver), French stakeholders were invited to take part in the main phase of the consultation. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept</p>

			<p>“recognize traditional commercial fishing zones within MPAs” are favorable. We therefore believe that French fishing, as a traditional activity for centuries in the waters of Jersey, must be considered and that some time to exchange on the subject could have been organized in 2023. We would also like to know what the question “manage French fishing vessels better” actually means? of which 5/5 opinions are favorable, while French vessels, in Jersey waters, are those subject to the most restrictive regulations.</p>		<p>and reasonable concerns expressed primarily by the Jersey and French fishing communities. Engagement with French fishers, Fishing organisations and government will continue as MSP plan elements develop. The question “manage French fishing vessels better” was recorded from workshops with Jersey stakeholders and is not the position of Jersey Government. A Business Impact Assessment will be carried out on the final proposed MPA boundaries.</p> <p>The assessment of French fishing effort had been assessed through VMS data, this has now been made clear in the text of the fishing chapter (section 9.3.2) and the methods used to create the spatial effort maps can be read in the evidence base document.</p>
JMSP-581511869	International relations	CRPMEM Normandy	<p>*Translated text* French fishing represents more than 50% of fishing activity in Jersey waters. The JMSP shows a desire to consider all the present activities, which is why it seems important to integrate representatives of French fishing into the entire process to find the “win-win” solutions, ultimately allowing the environmental protection objectives to be achieved, and to preserve Normandy’s traditional fishing activities.</p>	Yes	<p>The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing communities.</p>
JMSP-581511869	Habitat Map	CRPMEM Normandy	<p>*Translated text* In chapter 8 (the natural environment and biodiversity) of the consultation document, the variety of existing habitats in Jersey waters is presented. We observe that the waters of Jersey are divided into two large parts: in the West, relatively deep waters with habitats presenting few issues and, in the East, shallow waters where environmental issues are very important.</p> <p>We firstly note that the proposed protection zones strongly overlap with the fishing zones of Normandy vessels whereas certain other sectors would have less impact on their activity, this is particularly the case for kelp. We are surprised by the distribution of habitats, and we question the studies which made it possible to produce this habitat map (p.95). Next, the reference documents used for the writing of this chapter lead to some questions. We</p>	No	<p>The habitat map was created on best available evidence at the time (with field data up to 2020 included), and a ground truthing exercise was carried out that determined that the map was, at worst, 75% accurate. As the habitat map is modelled, there will regrettably be some errors but it is the best habitat map currently available. This map will be refined and updated over time and further survey work will be prioritised</p>

			<p>firstly note that many were written by the NGO Blue Marine Foundation which describes itself as aiming to restore the oceans following overfishing, one of the world's biggest environmental problems. Norman traditional fishing, with its very strict regulations in the sense of sustainable and responsible fishing, is in no way dictated by overfishing principles.</p> <p>In addition, we have questions about the accuracy of the data used to characterize the habitats. Indeed, the MPA Assessment Methodology reveals that the habitat maps of the years 1970 and 1980 were updated in 2019 but with data from 2014. Based on data that has more than 40 years, the updated state of knowledge of habitats is still 10 years behind schedule.</p> <p>These observations lead us to doubt the scientific rigor and neutrality of the studies used to construct this document.</p>		for within the proposed MPA network prior to implementation.
JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* Three habitats are presented as being of major concern:</p> <ul style="list-style-type: none"> - Eelgrass beds - Kelp forests - The maërl banks <p>These three habitats are listed in Annex V of the OSPAR Convention for the North-East Atlantic area. In the MPA Assessment Methodology it is mentioned that a minimum of 30% of each habitat to be protected must be represented in the entire MPA network and that it is flexible depending on the state of conservation and the surface area of habitats. We note that 100% of eelgrass beds, 89% of kelps and 86.7% maerl are within the proposed MPA network.</p> <p>Without calling into question the need to protect habitats, we believe that it is possible to fulfill environmental objectives by redesigning marine protected areas whilst taking into consideration the socio-economic challenges of French fishing.</p>	No	There has been a misunderstanding of the MPA assessment criteria. Jersey's territorial waters were divided into 1 km ² grid squares (polygons) and any of these squares with more than 30% OSPAR habitat was included in the MPA network. Ideally 100% of OSPAR habitats would be protected as mobile gear use on these habitats is incompatible with biodiversity conservation. However, the economic issues have been taken into account and the MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511869	MPA Methodology	CRPMEM Normandy	<p>*Translated text* Jersey, like France, aims to achieve 30% of its waters in marine protected areas (MPAs) by 2030. In order to achieve this common objective, it would be interesting to have consistency between the methodologies used by Jersey and France.</p> <p>For information, the French authorities have a methodology called Fisheries Risk Analysis (ARP) which is not based on a precautionary principle but on a characterization of interactions gear/habitats. Thus, distribution maps of habitats of communal interest are crossed with those of fishing activities (for each gear/metier).</p>	No	Jersey has taken an ecosystem based approach and has given the habitats and marine environment the greatest priority in the MPA assessment methodology. This approach is currently being opted for by other jurisdictions such as Ireland and is a UK endorsed methodology. However, the comments received from French stakeholders relating to the economic impact of the

			<p>Then from these elements, a risk of degradation is quantified, for this we need to acquire the necessary knowledge on the sensitivity of habitats to physical pressures. This makes it possible to achieve a risk of habitat degradation for each type of gear (1 type of gear /metier).</p> <p>The last step of this methodology is to estimate the risk of undermining the conservation objectives. This risk is established from the combination of the risk of habitat degradation, and by taking into account the level of concern of the habitat and local ecological / economic parameters (professional fishing activities). From these elements, we can assess a level of degradation: zero, medium and strong. Depending on the level, proposals for regulatory measures are issued and presented to fishing professionals for consultation.</p> <p>A better understanding of the measures taken on habitats could have been obtained by providing more elements. Indeed, in the documents provided for this consultation, it is never specified the state of conservation of the habitats. The main argument seems to be the extraordinary nature that these habitats present in terms of diversity. It is obvious that special monitoring must be granted to such remarkable habitat.</p> <p>However, implementing preventive ban measures in economically important areas and having a strong spatial dependence for fishing professionals raises questions. Mainly that, when the fishing effort as well as the real impact of fishing gear in different marine habitats are never quantified. The existence of 10 years photographic evidence for the Savages area is mentioned on p.86, but there is no reference to the evolution of habitats. It is probable that in 10 years, changes in the environment would have been seen if the gear used in this area degraded the habitats.</p> <p>The elements available to us demonstrate habitats in a good state of conservation in historic fishing areas. The presumed impact of these activities therefore does not seem prohibitive for these habitats.</p> <p>Thus, it could be interesting to provide additional information on the state of conservation of the habitats to be protected as well as to qualify and quantify the real impact of fishing gear on the seabed in Jersey waters.</p>		<p>MPAs have been taken on board and the MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.</p>
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JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* In Jersey waters as in French waters, eelgrass beds are present.</p> <p>On the French side it is mainly present within the Chausey archipelago where the state of the surface of the herbarium has been known for a century, mainly through photographic monitoring which allows us to have a very detailed map of this habitat.</p> <p>In Chausey, regular monitoring has shown that this habitat is constantly growing. since 1980 (Fournier, 2002, 2008, 2014, 2020; Godet et al., 2009). Indeed, from 164 hectares in 1982 (Godet et al., 2009), the Chausey herbarium covers at least 360 hectares in 2019 (Fournier, 2020). In addition, several studies prove that the regression of the herbarium before the 1980s was linked to the 'wasting disease' and not because of anthropogenic activity. It must also be emphasized that the redevelopment of the Chausey herbarium for 40 years has been carried out in the presence of fishing activities. The evolution of the herbarium can be explained by different factors, notably the natural dynamics of the species which is favored by the establishment of shellfish concessions (Fournier, 2020) but also favorable climatic conditions.</p> <p>A rare phenomenon on the scale of the European coast where most of the eelgrass beds are declining or stable. The surface regression of certain seagrass beds can be attributed to several factors. This habitat is very sensitive to temperature variations and water quality (Arias-Ortiz et al., 2018 ; Ondiviela et al., 2014)</p> <p>Over the last 20 years, the Normandy Breton Gulf has not experienced a period of intense cold, which could explain the emergence and development of eelgrass beds. It is also necessary note that this is a habitat with high resilience due to the presence of rhizomes. In the Chausey archipelago, no regulatory measures to restrict human activities are in place. They are also not justified given that this habitat is not conducive to the use of mobile gear. The fishermen themselves have put in place good practices which make it possible to reconcile fishing activities and improving the state of conservation of seagrass meadows.</p> <p>These facts clearly show that this type of habitat is more sensitive to climatic hazards than to fishing activities.</p>	No	<p>Seagrass is a priority habitat for Jersey and its demonstrated benefits to biodiversity outweigh mobile gear fisheries access value. Potting and other static fishing will still be allowed on this habitat under the MSP priorities.</p> <p>While we do not deny that climate change will impact on seagrass habitat, this will cause a cumulative impact on seagrass along with other pressures. It is necessary to mitigate pressures that are within our control, including mechanical disturbance.</p>
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JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* Kelp forests, a resilient habitat. This habitat (kelp) was added in 2021 to the list of OSPAR habitats. It is recognized for its role in carbon capture but is not identified as a threatened and/or declining habitat. According to the OSPAR list of threatened and/or declining species and habitats and the 2021 study, Laminaria species spp. (which make up the kelp forests of Jersey waters) are not identified as “threatened or in decline” for our OSPAR region. Thus, it is indeed a habitat of strong ecological interest. but in no sense a rare habitat or one whose conservation status is threatened.</p> <p>Granville Bay constitutes a sector of strong development of these species due to its low depth. Several species of kelp are considered in decline by the OSPAR convention. However, the main factor identified is global warming, in fact, kelp are very sensitive to water warming. But the last few winters have not allowed the water temperature to drop sufficiently. The impact of these warm winters is also being felt by other local species.</p> <p>From a biological point of view, this habitat has the particularity of exhibiting rapid growth, which allows it to regenerate easily if it is damaged. These algae grow on hard bottoms unsuitable for mobile gear practice (seabed: rocks). It is also thanks to this strategy that kelp have been able to develop in the Normandy-Breton Gulf. Indeed, the region is exposed to significant swell, particularly during storms. The storms have strong consequences on the kelp forests which are uprooted, as seen en mass on beaches post storms. Furthermore, their ability to regenerate easily allows them to redevelop quickly.</p> <p>It is important to take into account the different parameters having an impact on kelp before taking very restrictive measures on fishing. Fishing is not an adjustable variable. It would therefore be important to start by carrying out an inventory of the species present and reasons that lead to their decline if it exists in an observable and objective manner in order to take appropriate measures.</p>	No	Current mobile fishing practices rarely interact with kelp habitat, but it's ecological value merits suitable management against future industrial developments in fishing or seaweed extraction.
JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* This habitat is present in all OSPAR regions. However, it is identified as being threatened and/or declining only in the OSPAR III region (Celtic Seas). The Norman-Breton Gulf, therefore Jersey, is located in the OSPAR II region (North Sea in the broad sense). The state of conservation of the banks of Jersey maërl is therefore not threatened. This habitat must therefore be considered differently from other OPSAR habitats.</p> <p>It would undoubtedly be interesting to carry out additional studies aimed at characterizing more precisely the state of conservation of the maërl.</p> <p>Furthermore, this habitat is already protected at a site level by it's Ecréhous RAMSAR staus.</p>	No	There have been several local studies on maerl in this region that have found maerl to be in a reduced state in fished zones, and there is significant literature evidence for the negative impact of bottom towed gears on maerl. There is also literature evidence on the benefit of maerl for marine biodiversity, including commercial fishery species.

JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* The Sauvages reef is identified as being very rich. Several scientific monitoring studies have been carried out there, allowing the presence of cold-water corals such as gorgonians (<i>Eunicella verrucosa</i>) to be observed. Their growth is slow, which makes them more vulnerable to abrasion. It's a cold-water species present in Jersey at the lower limit of its geographical distribution area. The main factor of risk for this species is therefore global warming.</p> <p>The rest of the document leads us to believe that these species are also present in many other areas of Jersey waters. In addition, they are not subject to any international convention classification.</p>	No	<p>Pink seafan (<i>Eunicella verrucosa</i>) is classified under the Jersey Wildlife Law (2021). There is no evidence to suggest that global warming (climate change) is the greatest risk to this species. There is published research from studies in Lyme bay that show <i>E. verrucosa</i> to be found in greater abundance where potting levels are lowest. While <i>E. verrucosa</i> is found elsewhere, Les Sauvages is a hot spot. There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.</p>
JMSP-581511869	MPA Methodology	CRPMEM Normandy	<p>*Translated text* An inconsistency of protection issues</p> <p>We note that the document presents a type of habitat specific to the presence of gorgonians, it is stable hard seabed. The area where the presence of gorgonians is identified in this habitat is the south west of Jersey's waters. According to the map presented, this is clearly the site identified as ideal for the installation of a wind farm. This really raises questions about the real interest in protecting gorgonians in a site like Les Sauvages, which would have a proven impact on Normandy fishing whereas it would be possible to condemn a large area where this species is present.</p>	No	<p>There is currently no evidence of seafan presence in suggested windfarm area. Jersey is in the early stages of investigating a windfarm. However, now that the proposal to investigate a wind farm (P82-2023) has been approved, the submitted report from CRPMEM Normandy will be passed onto the windfarm team to inform the subsequent stages. Neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."</p>

JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* In the source documents, we found a report published by the NGO Blue Marine Foundation of September 2023 entitled “A baseline description of the benthic assemblages of Les Sauvages reef, Jersey” (Evidence Document EB/NB/11). First of all, the author, Blue Marine Foundation does not seem to us to be a scientific organization in the sense that it is not neutral but clearly oriented against fishing. Furthermore, in this document, the source data appears to come from observational outputs organized via the Jersey administration. Finally, the fact of having written this report in September 2023 makes us wonder: is this a source on which the JMSP was based, so late in the calendar or is it the other way around?</p> <p>The species identified are indeed interesting species but remain common in the bay of Granville.</p> <p>This site also seems identified as being of phylogenetic importance due to the presence of brachiopods (<i>Argyrotheca cistella</i>). What is known about this species? When informing, ourselves we realized that it has also been observed in the sector of Herm. Furthermore, given the characteristics of this species, can it really be impacted by fishing gear?</p> <p>The report also mentions the fishing activity present on the site. We don't understand how this data was obtained. Why is only scallop fishing identified and presented as the only activity in the area? There are also other significant fishing activities such as whelk and shellfish fishing which do not appear in this diagnosis.</p> <p>Fishing that respects habitats and has no impact This sector is an important fishing area, whether for potters or dredger trawlers. Concerning the mobile gear vessels, they have no interest in passing over the reef, they circumvent, currently navigation devices have now become sufficiently precise to avoid the reef while working nearby. This probably explains why these species are present and can develop.</p> <p>→ We therefore cannot support the establishment of this No Take Zone: - Just based on the elements provided. To justify such measures, it is imperative to base ourselves on scientific, neutral and bias-free studies. - With erroneous or incomplete fishing activity data.</p> <p>→ We oppose the establishment of an NTZ based on such weak elements in an area presenting such challenges for Normandy fishing</p>	No	<p>No under 12m vessel information for this area, only VMS which is primarily scallop dredging vessels. We understand that towed fishing gears are not used on the reef, the No Take Zone recommendation is primarily for the protection of slow growing sensitive species such as seafans. The Sauvages report referred to was not written for the purposes of being included in the JMSP and includes data from before the MSP instruction was given by the States assembly. There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.</p>
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JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* We would also like to emphasize the fact that the measures proposed for the network of marine protected areas identified are essentially based on the precautionary principle, and not on locally acquired scientific evidence. Indeed, a recent study published in 2022 by IFREMER consisted of studying the impact of mobile gear on the seabed in the English Channel. This is the IPREM study initiated and carried out by Normandy fishing professionals. This study demonstrated that the fishing intensity of French vessels in the waters of Jersey is weak. In addition, the IPREM report reveals that the potential impact of mobile gear on the seabed in Jersey waters is very little or even zero (figure 1). Although the impact of a gear depends on intrinsic factors to fishing activities (surface area exploited, penetration into the sediment, etc.), it must be remembered that this impact also depends on environmental factors such as the nature of the seabed or the sensitivity of benthic communities to different factors. However, the IPREM project demonstrated that the sensitivity of benthic habitats, and therefore the real impact of a device, remains unknown in the Channel. On the French side as well as the Jersey side, there is therefore a lack of knowledge on this subject. Finally, IPREM indicates that in the Channel, the communities of the seafloor are both resistant to fishing effort and difficult environmental conditions and that the Resistance to these two factors is linked. There is therefore a real need for additional studies to discern the effects that would be linked to the environment, or fishing, as well as to define the real impact on what the different gear could have on the different types of habitats.</p> <p>It is therefore necessary that the proposed protection zones are based on local scientific evidence, relating to the state of conservation of the habitats with identified sources and levels of pressures that are proven and quantified.</p>	No	The assertion that bottom towed fishing gear does not impact the seabed is at odds with the bulk of scientific evidence. Finer scale local data is available and has been used in preference to broad scale reporting for both stock, effort and habitat assessments. Enhancement of local data sets through additional research is in process.
JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* An example of a successful consultation reconciling fishing and environmental issues: Method for establishing Ramsar sites within the framework of the Granville Bay agreements</p> <p>In 2014, Jersey proposed the establishment of habitat protection sites for maërl and eelgrass beds. This was the first environmental approach within the framework of Granville Bay.</p> <p>This was the source of numerous debates in order to respond to all of the issues: protecting habitats of proven ecological interest while allowing activities to be maintained. The different steps are presented in the table below:</p> <p>February 2014 1st contact Identification of the need for consultation June 2014 Consensus on the need to protect habitats Request for charts sent by Jersey in July 2014</p>	No	We believe this refers to the implementation of the No Mobile Gear Zones (now referred to as MPAs) at the Ecrehous and Minquiers, which were already Ramsar sites. The current methods used are in line with the requirements of the TCA and the precautionary principle.

			<p>October 2014 Request for details on the issues linked to these habitats by France</p> <p>February 2015 Report presenting the challenges for the activity of French ships</p> <p>Proposal of new limits</p> <p>June 2015 Société Jersiaise is mandated to carry out a study to identify the problem areas</p> <p>October 2015 Discussions on the scope of future sites</p> <p>February 2016 Agreement on the perimeter of the Minquiers site</p> <p>Normandy has reservations about that of Ecréhous</p> <p>Request for the return of the report from the Société Jerseyaise to be able to decide</p> <p>July 2016 Publication of the Société Jerseyaise report</p> <p>Jersey proposes to extend the perimeter in the Ecréhous sector to protect the maërl</p> <p>Proposal for setting up a fallow system</p> <p>August 2016 The JFA opposes the fallow system and calls for a definitive ban of mobile gear in this sector</p> <p>February 2017 Agreement on the perimeter of the zone</p> <p>Normandy calls for a ban on scallop fishing (dredging and diving)</p> <p>September 2017 Publication of the Jersey decree with a ban on trawling and dredging on the perimeter</p> <p>Through this example, we can see that the exchanges lasted 3 years, but this made it possible to achieve a compromise.</p> <p>Furthermore, this work promoted the acceptance of such a project by (fishing) professionals.</p> <p>This methodology should serve as an example for future projects.</p>		
JMSP-581511869	International relations	CRPMEM Normandy	<p>*Translated text* In this part, the CRPMEM of Normandy is saddened to see that only Jersey fishermen are considered, when the JMSP cites the objective of ensuring that one can continue to earn a viable living as a fisherman. As an example, with this current MPA project, the Norman ship LE STYX would lose 100% of its business, because it only works in Jersey waters and in areas that could become MPAs. In addition, we regret that there is no official reference document about French fishing. We strongly regret that only 2 lines in the JMSP are used to describe French fishing, and yet Jersey waters are so important to French fishermen who depend on these waters.</p> <ul style="list-style-type: none"> • “Today there are [...] 137 French Vessels.” (P.130) • “Jersey’s waters are also fished by French fishermen under the terms of a post- 	Yes	<p>While the evidence base documents were not available online during the consultation they were available on request. The documents will also be published alongside the post-consultation version of the JMSP.</p> <p>The assessment of French fishing effort had been assessed through VMS data, this has now been made clear in the text of the fishing chapter (section 9.3.2) and the methods used to create the spatial</p>

			<p>Brexit fishing agreement with the EU.” (P.130)</p> <p>Then, we note that the JMSP presents a very confusing methodology which does not allow us to know how the activity of French ships was treated. The methodology used is barely described, the mapped fishing activities boil down to the presence/absence of vessels. Furthermore, it is only in the Maritime Activity Assessment (EB/G/22) that the use of VMS data for French ships is specified. Although the Maritime Activity Assessment presents an outline analysis of French fishing activities, a more in-depth analysis is necessary given the economic issues that exist.</p> <p>Furthermore, in the MPA Assessment Methodology, the Minister of the Environment indicates that the development of the network of marine protected areas will be consistent with environmental objectives, global, economic and social”. The term “global” makes us think that French fishing is considered in the development of the JMSP. Therefore, and within the framework of the TCA, it is necessary to consider French fishing as an economic issue in its own right. The term “global” leaves us also think that the environmental objectives and the challenges for French fishing will be harmonized with French environmental policies which border the waters of Jersey.</p>		<p>effort maps can be read in the evidence base document.</p> <p>Assessment of and provision for French vessels with a high dependence on specific areas within Jersey's waters has been recognised in this process. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing communities. Further, a Business Impact Assessment will be carried out on the final proposed MPA boundaries.</p> <p>The current methods used are in line with the requirements of the TCA and the precautionary principle. Any changes to mobile gear access will follow the processes set out in the TCA. Wider study and partnership working will take place ahead of implementation of spatial management measures that impact fishing, French representation in this process will be sought.</p>
JMSP-581511869	Commercial fishing	CRPMEM Normandy	<p>*Translated text* Chapter 9.3.1 (Current fishing trends) gives data through volumes landed of the main fish species. Firstly, no regret (no surprise) that this part dedicated to landings and stocks only refers to landing data and that no stock assessment is presented.</p> <p>Next, we note that the data presented does not correspond to those compiled by the CRPMEM of Normandy from scientific organizations (Ifremer, SMEL).</p> <p>Indeed, we observe different trends in some species. This is the case for lobster, where the results are estimated as good on the French side. This is also the case for scallops where the results of the various surveys show a stock and landings constantly progressing.</p> <p>Marine species know no borders, so we all work with the same stocks. As demonstrated by Nicolle et al. (2017), the stocks of the different scallop shell deposits in the Norman-Breton Gulf are interconnected and dependent on each</p>	No	<p>Outside of scope of the JMSP - this will be addressed through fisheries management and improved working relationships with the French fisheries authorities and scientists. Until recently (2023) detailed reporting of landings from French vessels fishing in Jersey waters was not available and so the trends shown are only from that of Jersey vessels.</p> <p>Wider study and partnership working will take place ahead of implementation of spatial management measures that impact fishing, French representation in this process will be sought.</p>

			<p>other to form one and the same stock. In this study, it was demonstrated that the recruitment and therefore the local stock of scallops from southeast Jersey depend largely on local stocks from Saint-Malo and Chausey. Thus, the management measures formerly applicable in Jersey waters, but also the stocking carried out since 2009 strongly contributes to the quality of the stock in the waters of Jersey. It therefore seems all the stranger to us to have contradictory tendencies.</p> <p>We have a real common interest in ensuring sustainable management of fish stocks in the Bay of Granville, which implies the establishment of coherent work between Normandy, Jersey and Brittany and this in a concerted manner.</p>		
JMSP-581511869	Commercial fishing	CRPMEM Normandy	<p>*Translated text* In chapter 9.3.2 (Current spatial fishing patterns) on the current spatialization of fishing activities, the description of fishing activities is very succinct. From the way this short section is written, we understand that the mapped activities are those resulting from AIS data, control data and declarative data only for Jersey vessels. In the absence of a complete presentation of French fishing activities in the JMSP, we have consulted the source documents on which the JMSP is written; the MPA Assessment Methodology and the Maritime Activity Assessment. We note that French fishing activities are partially described. We would like to provide you with our comments.</p> <p>Why have you not presented the methodology used and the data more precisely in the JMSP? In particular on French fishing activities which are mixed in with the activities of Jersey vessels? Furthermore, why have you carried out an analysis of French fishing activities without consulting the French services concerned so that it is as representative as possible? Why was the MPA network impact study on fishing vessels not taken up and presented in the JMSP?</p> <p>An incomplete cartography – Analysis of the description of French fishing activities reference documents :</p> <p>In the Maritime Activity Assessment, there is an analysis of French fishing activities. We observe that the data used was the year old VMS data, from July 1, 2022 (entry in force of the quarter-hour VMS obligation in Jersey waters for all French vessels) until June 30, 2023. As cited in the document, one year of data is completely insufficient to carry out a fair and precise analysis of fishing activities knowing that the activity of French fishermen contain interannual variability, not taken into account here. Furthermore, at this period and within the framework of the post-Brexit discussions linked to the TCA, we were in the middle of period of negotiations on the definition of the Nature and Extent of the activity. Fishing conditions in Jersey waters were therefore extremely vague. The regulations</p>	No	<p>The MPA network is just one part of the much wider remit of the JMSP, it was not possible to include all assessment methodologies within the main document and is why supplementary documents have been provided. Further, the Marine Activity report provides a general indication of fishing activity. However, a Business Impact Assessment will be carried out on the final proposed MPA boundaries using multiple years of data.</p> <p>The assessment of French fishing effort had been assessed through VMS data, this has now been made clear in the text of the fishing chapter (section 9.3.2) and the methods used to create the spatial effort maps can be read in the evidence base document. While VALPENA adds a layer of knowledge to spatial fishing activities, VMS being more accurate is Jersey's preferential data source for spatial fishing assessments.</p> <p>Wider study and partnership working will take place ahead of implementation of spatial management measures that impact fishing, French representation in this process will be sought.</p>

			<p>were fluctuating since the French regulations had to be maintained during the negotiations. It's only February 1, 2023 that the Jersey fishing conditions were published and that from June 27, 2023 (publication of a ministerial decree) that they were fully applied. The professionals were therefore disoriented, in full adaptation phase and cautious in the face of all these rapid changes. As a reminder, the TCA is based on 3 full years, prior to Brexit, between 2017 and 2020. This makes it possible to take into account all activities as well as inter-annual variability.</p> <p>Therefore, this period (07/01/2022 – 06/30/2023) is absolutely not a year of reference regarding the activity of French ships in Jersey waters.</p> <p>In addition, it is cited that in 75% of cases, VMS data could be linked to declarative data from the logbook to identify the metier practiced. For the remaining 25% of cases, VMS data could have been connected either to a static gear (engin dormant) or to a mobile gear (engin trainant) but by which one?</p> <p>Next, in the source document, it seems that a fishing haul is identified from the moment when a vessel moves at a non-zero speed of less than 6 knots. This is actually the method that is generally used. However, the latter was put in place for mobile gear boats, ships initially equipped with VMS. The specificity of Granville Bay is the fact that a fleet of small fishing boats, mainly using static gear, finds itself working in the waters of a third country. Static gear boats do not work in the same way: they turn at zero speed and generally spin (shoot their pots) between 5 and 7 knots, the method used is therefore not representative for static gear. Additionally, it is true that France made VMS mandatory in July 2022, however, given the complex context of the moment, many ships took time to equip themselves. It is therefore likely that this data is not representative of the entire fleet.</p> <p>Then, the use of VMS as the sole source of data raises serious questions. To characterize the fishing activities of Jersey vessels, all available data was used by seeking to use VMS, iVMS, AIS data then the FISHMAP surveys carried out by Jersey. It is worth noting these FISHMAP surveys also use the French VALPENA survey methodology. In addition, as the FISHMAP 2017 data was too old, the Jersey fishermen were able to ask during a consultation in March 2023 for an update to this data. New investigations were then carried out to characterize fishing activities over 4 years, from 2018 to 2022. Thus, over 5 years of surveys between 2017 and 2022, the best year for Jersey ships, was selected.</p> <p>As CRPMEM of Normandy, partner of the VALPENA network, we are (totally baffled) in incomprehension. Why were other, more complete data sources not sought to characterize French fishing activities? Why did you not ask for</p>		<p>Static fishing is not affected except for at Les Sauvages which is not a heavily used area for potting.</p>
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			<p>information from the CRPMEM and use similar data from the VALPENA data for French ships, which have been collected collaboratively over the last 20 years of the Granville Bay Treaty? Why not you not seek to identify fishing activities over several years and retain the best year?</p> <p>To be able to base itself on objective elements, it is necessary for the JMSP to adopt a similar methodology for the Jersey fleet as for the French fleet by mobilizing the best data available.</p> <p>Once again, we consider the data used for French ships to be unrepresentative and incomplete. The exploitation of certain sectors has therefore been considerably underestimated, such as for the Sauvage Reef.</p> <p>This is why, BEFORE the finalization of the JMSP, it seems essential to us that a study of the fishing activities of French vessels is carried out jointly with professional French fishing organisations.</p>		
JMSP-581511869	Seabed protection	CRPMEM Normandy	<p><i>*Translated text*</i> Impertinent spatial data analysis method</p> <p>Concerning the impact analysis of the MPA network project on fishing activities, we do not understand why it was not presented in the JMSP especially since French fishing represents a large part, or even the entirety for certain professions, of mapped fishing activities. Furthermore, we do not understand the methodology used to identify the impact of the potential network of marine protected areas on French fishing in the MPA Assessment Methodology. In this last document, this analysis is based on days attributable to mobile gear and static gear to identify their activity within the various proposed marine protected areas.</p> <p>We do not understand the logic of allocatable days for static gear. Under the TCA, Fishing days were allocated only to mobile gear and not to static gear. Next, Jersey recognizes that MPAs lead to a transfer of existing fishing zones to others. Environmental issues are then shifted to other areas, which is counter productive. Jersey therefore recommends that the impact of MPAs on fishing vessels be documented to avoid this problem. We also identify a risk of postponement of activity which could significantly deteriorate adjacent areas, which is a shame given that the overall impact remains moderate and the habitats are in good condition.</p> <p>The MPA Assessment Methodology also indicates as an objective that the MPA network must minimize the impact on the fishing economy and it is recommended to carry out an assessment, vessel per vessel, of the consequences of marine protected areas once the JMSP is finalized and published. The analysis of the socio-economic consequences is essential but must take place during the process of consultation and establishment of marine protected areas.</p>	Yes	<p>Some comments relate to the MPA assessment methodology rather than JMSP itself. The only displacement of static fishing has been suggested at Les Sauvages reef. For consideration of mobile fishing gear, the MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. Further engagement work will take place ahead of the implementation of new spatial management measures. A Business Impact Assessment will be carried out on the final proposed MPA boundaries. The current methods used are in line with the requirements of the TCA and the precautionary principle. Any changes to mobile gear access will follow the processes set out in the TCA.</p>

			<p>What is the aim of this retrospective approach? Is it foreseeing that based on the results of the impact of fishing activities there will be a questioning of the proposed areas of the JMSP?</p> <p>What is the benefit of an individual approach to fleets?</p> <p>How to minimize the impact on the economy when the areas proposed for the ban are modelled on the areas frequented by Norman fishing vessels? Why carry out this impact study only after finalization of the JMSP and not before?</p> <p>We ask that this study of the socio-economic consequences on fishing vessels French is carried out BEFORE the finalization of the JMSP and in collaboration with the professional French organisations.</p>		
JMSP-581511869	MPA Methodology	CRPMEM Normandy	<p>*Translated text* Given the weakness of the diagnosis of Normandy fishing activities, it is essential that the elements that we provide below complete it and their integration is the subject of an exchange between us.</p> <p>A highly regulated Normandy fishery meeting the challenges of sustainable management</p> <p>Norman fishing vessels have worked in Jersey waters for centuries and continue to do so to this day. Today, the main activities are divided into two types of professions:</p> <ul style="list-style-type: none"> - Static gear: shellfish pots, whelk pots, nets and line fishing - Mobile gear: scallop dredges, clam and sea almond dredgers, dredges bivalve trawl, bottom trawl, beam trawl, pelagic trawl, pair trawl <p>Depending on the métiers practiced, the fishing strategies of each vessel differ more or less depending on regulations, seasonality, the species fished and its availability, the distance from the port.</p> <p>This variety of métiers and practices creates a balance compatible with the sustainability of stocks, which also implies that the preservation of habitats on which fish species depend no longer needs to be demonstrated (proven).</p> <p>In addition, Normandy fishing regulations are among the strictest and make it possible to support or even improve stock status. Taking the example of scallops, the self-imposed constraints by professional Fishermen mean shorter fishing times which fully contribute to reducing the impact of mobile gear on the seabed in a spirit of responsible and sustainable fishing.</p> <p>A spatialization of the VALPENA data from Norman fishermen in the area</p> <p>Valpena methodology: In their mission to defend the interests of professional fishermen, the fisheries committees need to have knowledge of the activities of their vessels on a scale consistent with that of projects for new activities at sea, the fisheries committees have set up a tool for spatializing these activities.</p> <p>VALPENA stands for the eVALuation of fishing activities (PEche) with regard to of New Activities (VAL-PE-N-A) thus originates from a common desire of the</p>	Yes	<p>The assessment of French fishing effort has been assessed through VMS data. The MPA boundaries have been adjusted following the consultation to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. Wider study and partnership working will take place ahead of implementation of spatial management measures that impact fishing, French representation in this process will be sought.</p> <p>The assessment of French fishing effort had been assessed through VMS data, this has now been made clear in the text of the fishing chapter (section 9.3.2) and the methods used to create the spatial effort maps can be read in the evidence base document. While VALPENA adds a layer of knowledge to spatial fishing activities, VMS being more accurate is Jersey's preferential data source for spatial fishing assessments.</p> <p>A Business Impact Assessment will be carried out on the final proposed MPA boundaries.</p>

			<p>fisheries committees to provide standardized geographic data and elements quantified according to a scientific method established to characterize the activity of professional fishing vessels on a fine spatio-temporal scale (grid of approximately 3 nautical miles per side). The scientific approach underlying the entire VALPENA methodology is based on the activity of the Scientific Interest Group (GIS) VALPENA and the 'Géolittomer' laboratory of the UMR-LETG in Nantes, guarantors of the integrity of the survey protocols and methods of using the data produced. VALPENA data is collected by direct individual surveys of fishermen to year n-1 (last full year). Each fisherman declares the activity of his vessel(s) per month, by gear and by target species on a grid scale of approximately 3 nautical miles per side.</p> <p>The data used in this report comes from VALPENA data from surveys for the year of activity 2020. The time allocated to carry out this return unfortunately did not allow us to carry out a multi-year evaluation which would nevertheless be necessary.</p> <p>Generally speaking, the waters of Jersey are frequented all year round by Norman ships (figure 4). Figure 5 presents the intensity index, i.e. the total number of months worked per grid. We can see that the Norman ships worked mainly in the eastern part of Jersey waters, close to our border. We can also see that a significant part of the future Jersey marine protected areas are located in areas often frequented by Normandy ships.</p>		
JMSP-581511869	Commercial fishing	CRPMEM Normandy	<p>*Translated text* Shellfish pots</p> <p>The main targeted species are lobster, spider and crab (on a more timely basis). Recent reports indicate that lobster is doing well globally. It is a territorial species, which lives on rocky bottoms where it can hide and feed. We have identified two sectors where lobster is particularly targeted: Minquiers and Ecréhous. Fishing for this species is done using pots.</p> <p>Spider fishing is carried out mainly by pots for Normandy ships. We identify several fishing strategies for this species. There are moussettes, juvenile spiders which are highly valued, which are the subject of a specific fishery on the Cotentin coasts. They are seasonally present and are very mobile. Fishing therefore begins in the waters of Jersey during the month of March and moves towards the French coast, it generally ends during the month of June. Large males are also targeted for much of the year. In 2020, 50 Normandy vessels, now granted access to Jersey, held a Fishing license allowing Crustaceans. Among them, 39 participated in the Valpena surveys, which is 78% participation.</p> <p>The Valpena density indicator shows us the crustacean activity located mainly in the eastern part of Jersey waters (figure 6). We clearly find the rocky bottoms</p>	No	Static fishing is not affected except for at Les Sauvages which is not a heavily used area for potting.

			<p>(Ecréhous, Arconies, Minquiers) but also the sandy bottoms located between these sectors and which correspond to areas for spider crab fishing.</p> <p>The Ecréhous sector is frequented throughout the year, the Minquiers are frequented mainly from February to September. The strip between the two archipelagos is mainly frequented by March to July, which corresponds to the period of high production for the spider crab.</p>		
JMSP-581511869	Commercial fishing	CRPMEM Normandy	<p>*Translated text* Whelk box (<i>Buccinum undatum</i>)</p> <p>The whelk is an emblematic species of Granville Bay. It has been the subject of monitoring for many years, which allows us to have a lot of data on it. In 2020, 49 Normandy vessels holding the whelk Ouest-Cotentin license were active in the waters of Jersey. Among them, 34 participated in the Valpena survey, which is 69% participation.</p> <p>The Valpena density indicator shows us whelk activity located mainly in the Eastern part of Jersey waters (figure 7). Here we find an activity practiced on loose sediment and in proximity to rocky bottoms. The areas of highest attendance are located between the north of the Sauvages and the south of Ecréhous as well as in the northern part of Jersey waters.</p> <p>The activity is regular throughout the year (except in January when fishing is closed). We can also identify three major fishing sectors: Les Sauvages, Les Arconies and the north of Les Ecréhous.</p>	No	Static fishing is not affected anywhere except for at Les Sauvages which is not a heavily used area for potting.
JMSP-581511869	Commercial fishing	CRPMEM Normandy	<p>*Translated text* Mobile gear</p> <p>As part of the TCA, Jersey has chosen to allocate a number of days to mobile gear vessels in their waters, in order to take into account the versatility of these vessels. It is true that many of them can use several métiers on the same trip. Concerning the data from the Valpena surveys, 17 vessels responded in 2020 out of the 27 concerned, or 63%. This allowed us to identify the most frequented areas (figure 8).</p> <p>We can observe that a large part of the waters of Jersey are worked by mobile gear boats. The areas mainly worked are the West of the island and the entire eastern part of Jersey waters border with Normandy waters.</p> <p>In the West, trawl and scallop dredge activities are carried out. On the eastern strip of Jersey waters, we find trawling and scallop dredging and clam and sea almond dredges. These professions are mainly practiced in the southern and eastern sectors of Minquiers, Les Sauvages and east of the Arconie plateau. This</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. The assessment of French fishing effort had been assessed through VMS data, this has now been made clear in the text of the fishing chapter (section 9.3.2) and the methods used to create the spatial effort maps can be read in the evidence base document. The JMSP poster map has also been amended. There is now reference to working with the French fishing community in the implementation of

			<p>is explained in particular by the fact that these areas are sheltered from the prevailing winds, therefore more accessible areas.</p> <p>For economic reasons, fishermen seek to limit their travel time, working in Jersey waters is not an end in itself but the response to a fishing strategy in order to find the balance between production and costs. These sectors are therefore essential to the economic maintenance of businesses.</p> <p>The JMSP also specifies in its methodology that it seeks to find a balance between the ecological, economic, social and cultural issues. As such, the JMSP follows the marine space planning methodology indicated in the 'UNESCO Global International Guide on Marine Spatial Planning'. This guide indicates that the stakeholders to be considered in the consultation may be foreign stakeholders. As such and in view of the importance of French fishing in the waters of Jersey, it seems essential to us that French ships be considered and that their representatives be consulted unless they have been consulted during the year 2023.</p> <p>Furthermore, the TCA is rarely mentioned in the JMSP, only twice out of ten lines in the part 4.2.4. The TCA still commits Jersey to respecting the precedents and historical activity of French ships in its waters. During its only appearance, the JMSP recalls precisely this obligation to respect the TCA.</p> <p>The fact of prohibiting sectors widely used by French ships is therefore contradictory with the TCA since at no time were French fishing activities considered and at no time has Jersey sought to create a consultation dialogue to define marine areas protected areas excluding certain fishing activities.</p>		<p>priorities and actions added to section 3.3.4. The current methods used are in line with the requirements of the TCA and the precautionary principle. Any changes to mobile gear access will follow the processes set out in the TCA.</p>
JMSP-581511869	Seabed protection	CRPMEM Normandy	<p>*Translated text* The proposed zones correspond to the recommendations made in chapter 8. The data from frequentation of Norman ships in Jersey waters clearly shows that certain areas proposed represent sectors with high stakes for Normandy fishing.</p> <p>After reading the MPA Assessment Methodology, we discovered that by 2030 Jersey will offer new additional protection zones in order to achieve 30% marine protected areas (figure 9).</p> <p>In the figure below we can thus observe the priority areas to be extended as MPAs, when additional work will have to take place.</p> <p>Firstly, we strongly regret that the intention to extend the network of MPAs around the areas currently proposed is not transparently displayed in the JMSP. It seems to us important that the perimeters currently proposed be appreciated in the light of all the goals.</p> <p>Secondly, we note that despite the lack of recognized scientific knowledge, areas envisaged for the future are again found exclusively in the eastern part of the waters of Jersey. To the extent that MPAs appear to be associated with a</p>	No	<p>The areas referred to are areas for further research as they scored moderately in MPA assessment methodology.</p> <p>The JMSP itself does not seek to protect 30% of Jersey's waters, only those areas evidenced as being sensitive to mobile gear. While highlighted as needing further research in the evidence report, these areas did not make it into the JMSP public consultation draft.</p> <p>A Business Impact Assessment will be carried out on the final proposed MPA boundaries.</p>

			<p>systematic ban on the practice of dredging and trawling or even any fishing, the consequences of the network currently proposed followed by an extension of this network only in the fishing zones of Normandy vessels is extremely worrying.</p> <p>In this context, it would be wise to review these perimeters in order to find solutions that allow you to fulfill the objectives of the JMSP, namely the protection of critical habitats, the achievement of the objective 30% protected areas by 2030 but also the sustainability of existing activities.</p>		
JMSP-581511869	International relations	CRPMEM Normandy	<p>*Translated text* First of all, this paragraph does not mention the measures and labels already in place, which is regrettable. We would like to remind you that fishing is already regulated, whether on the French or Jersey side. With an objective of sustainable management, numerous measures have been put in place. There are two levels of regulation: at a European level for species monitored by ICES (generally speaking these are fish and selachians) and at a regional level for other species (shellfish and crustaceans). For the latter, it is the fishermen, via the Fisheries Committees, who put in place measures based on fishery monitoring, to ensure sustainable and economically viable fishing.</p> <p>The West Coast of the Cotentin is also an example of long-term management with monitored species and management over a very long time, this is the case for whelks for which the first management measures were taken in the 70s! If we take the example of this species, it has been the subject of numerous management measures taken over the years (see diagram). These measures aim to perpetuate the fishery and adapt it as best as possible to resource conditions.</p> <p>In 2023, the reduction in the number of Normandy licenses made it possible to reach a total number of 65 licenses. Among them, 45 were associated with access to Jersey waters.</p> <p>It is also important to remember that Jersey's waters have benefited from all the Norman management measures, these management measures until 2021 within the context of the common sea (la mer commune). In this mer commune context, a good number of common measures could be taken through the Granville Bay Treaty. This made it possible to ensure consistency in water</p>	No	<p>Outside of scope of the JMSP - this falls under current fisheries management. The JMSP also makes very few recommendations concerning the pot fishery, with the only restrictions suggested at Les Sauvages due to the high biodiversity and particular sensitivity to abrasion from pot lines.</p>

			<p>management across the entire fishing fleets. Figures 10 and 11 present all the measures that have been taken jointly over the last thirty years.</p> <p>The establishment of this common management, even if it remains subject to improvement, has made it possible to achieve coherent measures at the scale of local stocks which are compatible with their life cycles and biology.</p> <p>In addition, the measures put in place on shellfish pots make it possible to respond to certain objectives of the JMSP concerning ghost fishing: these pots have the particularity of continuing to fish a significant quantity when they are lost, the fact they are banned in the Minquiers and the Ecréhous (figure 12) therefore makes it possible to significantly limit the impact linked to ghost fishing.</p> <p>Furthermore, the fact that escape hatches are now obligatory on all the parlour pots (and on all the shellfish pots on the Normandy side) allows sorting to be carried out on the seafloor and not on the deck. Undersized lobsters therefore no longer have to suffer from being thrown back into the water column where they are vulnerable. In addition, this allows small lobsters to come out more easily, therefore limiting the risk of cannibalism within the pots.</p> <p>These measures also made it possible to obtain the MSC label for lobster in 2011. This label has the particularity of being shared between Jersey and Normandy, which is unique. This represents more than 10 years of certification. This is a joint management model that has borne fruit. Obtaining and maintaining this label, renewed in December 2023, shows the common commitment to move towards sustainable fishing, this has also allowed a strong improvement in knowledge on the state of this stock.</p> <p>We have every interest in continuing to work in this direction and working together to guarantee the sustainability of fisheries. We would like to remind you that we work on common stocks, unaware the border, we therefore have the same issues.</p>		
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JMSP-581511869	International relations	CRPMEM Normandy	<p>*Translated text* As a professional structure aiming to defend the interests of traditional Norman fishing, the CRPMEM of Normandy wants to contribution to this consultation document with the aim of pointing out the importance of Jersey waters for Normandy fishing, and the need for this to be taken into account. Over the years, Norman fishing vessels have continually lost rights in Jersey's waters (table 1). This is associated with a feeling of injustice among professionals who do not do not understand the loss of rights while their fishing practices constantly evolve in the direction of more sustainable management and a reduction in fishing effort.</p> <p>We would like to remind you that French fishing represents a significant part of fishing activity in Jersey waters and has been doing so for centuries. While their fishing rights have been significantly reduced by Brexit, and the post-Brexit negotiations are still not finalised, this new regulatory layer risks putting a terrible strain on already weakened fishing businesses. This therefore involves taking them into consideration as well as the economic issues associated with it.</p> <p>We are not opposed to the protection of habitats when it is necessary, this approach also exists on the French side, however we believe that it is possible to achieve the stated environmental objectives whilst preserving Normandy's traditional fishing activities.</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing communities. Previous MPA areas have been created following full consultation through the Granville Bay agreement.
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JMSP-581511875	Renewable energy	CRPMEM Normandy	<p>The report submitted by the Normandy Fishing Committee (Le Comité Régional des Pêches Maritimes et des Élevages Marins de Normandie) details their comments on the windfarm from issues relating to socio-economic impacts on French fishing vessels to environmental issues and maritime safety. The report is too long and detailed to include in this table and is instead available on the Government of Jersey Marine Spatial Plan webpage.</p>	No	<p>Outside of scope of the JMSP - while the information provided is very detailed, it cannot be included in the revised version of the JMSP as it does not go into the detail of a windfarm and Jersey is in the early stages of investigating a windfarm. However, now that the proposal to investigate a wind farm (P82-2023) has been approved, the submitted report from CRPMEM Normandy will be passed onto the windfarm team to inform the subsequent stages. Neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."</p>
JMSP-580863360	MSP	Durrell	<p>Durrell Wildlife Conservation Trust (Durrell) is participating in this consultation to highlight our full support for the implementation of the draft Jersey Marine Spatial Plan (JMSP), particularly for the proposed Marine Protected Areas (MPAs) and Seagrass Habitat Management Areas. The marine environment may not be an area of significant expertise for Durrell, however, we believe the proposed policies align with our mission of saving species from extinction and habitat restoration, therefore is something we wish to support.</p> <p>With over 95% of Jersey's territory being ocean, Jersey finds itself with a unique opportunity to have a considerable impact on its marine environment. Durrell recognises that the marine environment is integral to the island of Jersey's rich culture, local economy and islanders' livelihoods. Jersey has a symbiotic relationship with the marine environment, serving us with a range of ecosystem services, be it regulating, supporting, cultural or provisioning services, such as climate regulation, food provision, nutrient cycling, tourism and carbon sequestration. Therefore, the opportunity to protect and enhance Jersey's</p>	No	General comment of support.

			marine environment is essential to maintaining the long-term sustainability of our economy, livelihoods and most importantly, the health and species-richness of these areas.		
JMSP-580863360	Seabed protection	Durrell	<p>We identify clear synergies between our conservation work and the proposed MPA network, as outlined in Priority NB5 Stage 8. Through our field programmes, we restore and expand habitats, connecting fragments of isolated forest to enable greater movement and safety for the species endemic to these areas. The MPAs play a similar role, be it for the marine environment, to restore and enhance marine biodiversity within this network.</p> <p>Durrell believes that expansion of MPAs in Jersey's waters (Priority NB5), plays a key role in achieving the '30 by 30' target, whereby 30% of Jersey's waters are protected by 2030. With only 6.5% of Jersey's territorial waters currently being covered by MPAs, nearly quadrupling the current area would have significant benefits for restoring and enhancing the biodiversity of Jersey's marine environment, along with the many climate, economic and social benefits that it serves, particularly ensuring the sustainability of Jersey's fishing industry.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-580863360	Climate	Durrell	Globally, we are facing a climate and biodiversity crisis, both of which are inextricably linked. Jersey has committed to tackling the climate emergency, in which the Carbon Neutral Roadmap (CNR) outlines a series of carbon emission reduction policies. Durrell recognises the potential that Priority NB6 implementation of Seagrass Habitat Management Areas can play in carbon sequestration, in which greater protection and potential expansion will contribute to meeting Jersey's climate and biodiversity commitments. Durrell believes that the protection of the marine environment plays a key role in achieving the targets set out in the CNR and therefore, implementation of the MSP is an opportunity that cannot be missed.	No	General agreement comment

JMSP-581178701	Renewable Energy	Dyna Energy	<p>1. An MSP helps to reduce the risk of offshore wind development. It provides confidence to investors that there is broad agreement with marine stakeholders that certain areas are prioritised for offshore wind development and that development of infrastructure in these areas has already been considered. This is also likely to benefit the permitting process and stakeholder engagement throughout the development of a project specific environmental and social impact assessment.</p> <p>2. To improve engagement, understanding, and use of the JMSP we recommend that an interactive version is published online. Finland has published its MSP in a digital format and is an excellent, good practice example (www.merialuesuunnitelma.fi).</p> <p>3. Although it resides outside of Jersey's waters, it is important to acknowledge the presence of the Saint Brieuc offshore wind farm. This already has an impact on the seascape as it is often visible from Jersey's shores. It is worth acknowledging this in the MSP when describing the seascape characteristics.</p> <p>4. Figure 5j shows a map of the annual average wind speed across the maritime area. The data used is a very coarse resolution. A far higher quality dataset can be freely downloaded from https://globalwindatlas.info/en/area/Jersey. This resource of the World Bank is widely used by the industry and governments around the world and acknowledged as high quality.</p> <p>5. Figures 9b to 9i show the areas used for different types of fishing activities, based on vessel tracks which is analogous to effort. This, however, does not show the value of these areas to the fishing industry. To better understand the importance of these different areas, it would be helpful to understand the spatial distribution of typical annual economic value.</p> <p>6. We understand that section 12.6 on offshore wind is still to be developed, pending the Government's decision on the future development of a wind farm. Given our interest in offshore wind, we would appreciate the opportunity to review this section once it is drafted.</p> <p>7. Section 12.7 covers the topic of tidal power. As mentioned, one of Dyna Energy's founders has previously undertaken work for the Government of Jersey on both tidal stream and tidal range technologies. It is important that the JMSP acknowledges that these two technologies are vastly different; tidal range uses the changing height of water and requires a large wall to impound water, using hydro power turbines to generate electricity; tidal stream uses the flow speed of water due to the tides to turn rotor blades, in a similar topology to a wind turbine. Global experience with tidal range has been very limited (only two large schemes currently operate – La Rance, France, and Shiwa, Korea). Tidal stream technologies are still being developed and are not commercially available. The impacts and implications of these two technologies are very different. While</p>	Yes	<p>The final version will be more interactive, with document links. A note has been added to Character Type J Deep Sea in Chapter 7 regarding the St Brieuc windfarm. The data source has been amended in Fig. 5j (wind speed). The fishing value of the areas will be addressed through an MPA Business Impact Assessment but this will be for the impact of the Marine Protected Areas, not the windfarm as a spatial boundary for the windfarm is not yet determined. Other comments relating to the wind farm and tidal power are appreciated but are beyond the scope of this first iteration of the MSP, partly as its timeline is parallel to that of the Wind consultation.</p>
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			Jersey does have a tidal range which is one of the largest in the world, the challenges of utilising this energy resource cannot be understated. Previous work found that St Aubin's Bay is the only practical location for the deployment of tidal range. An area off the north east of Rozel is likely the only practical location for tidal stream, and this would only allow for a small number of turbines. We recommend that further detail is provided in this section of the JMSP.		
JMSP-570901492	Renewable energy	Flotation Energy	<p>Flotation Energy is an offshore wind developer with a keen interest in developing a utility scale offshore wind farm in Jersey's waters to help meet the environmental, economic and decarbonisation targets of the island.</p> <p>The development of a marine spatial plan is a critical step in the management of the island's marine environment and the sustainable use of its resources for the people of Jersey. We are very happy to see the publication of the Jersey Marine Spatial Plan ("JMSP") and the comprehensive examination of the current state of the marine environment. We are also eager to see the publication of the supporting data and the launch of the MSP portal. In the interests of developing an offshore wind project, the JMSP is a critical step in facilitating that ambition and ensuring it is delivered within environmental limits and meets the government and community's social and economic ambitions. Delivering a large offshore wind project at the pace required to meet net zero commitments will require clear and consistent planning and consenting processes as well as a developer willing to deliver the necessary environmental and engineering assessments in tandem with developing legislation and government processes.</p> <p>Whilst the JMSP points to the government's offshore wind proposal, due to that information not being available at time of publication, it is important that the possibility of offshore wind development is captured in the JMSP so that the interaction with the environment and other sea users is considered and understood. We are, therefore, pleased to see section 12.6 included in the consultation draft and the reference to work already carried out in the Bridging Island Plan (2022).</p> <p>Following the Government of Jersey's consultation on the offshore wind proposal, we would encourage section 12.6 to be updated with a clear indication of spatial preference and limitations, alongside priorities for the offshore wind opportunity. Any required actions relating to the development or</p>	Yes	An additional sentence has been added to acknowledge the challenging conditions in southwest of the Bailiwick in section 12.5 (formerly 12.6). Some elements of the comment are beyond the scope of this first iteration of the MSP as its timeline is parallel to that of the Wind consultation.

			<p>relating to co-existence within the marine space should also be included.</p> <p>The JMSP provides a very clear indication of the presence of sensitive features and areas of the marine environment that should be protected. Although the JMSP does not set out a specific area for offshore wind, it does provide a clear steer away from certain locations. Alongside the Bridging Island Plan, this information suggests the southwest is of most interest for offshore wind. Our own site identification process and early survey work confirms this suggestion. We absolutely support the use of best practice in environmental assessment and marine conservation.</p> <p>We would like to highlight two topics for potential inclusion in the updated JMSP</p> <p>Offshore wind spatial planning: The area indicated in the JMSP, Bridging Island Plan and our own assessment for possible offshore wind development is dominated by a hard rocky seabed with little sediment, due in part to fast tidal movement. This will limit foundation options for offshore wind and, as exemplified by recent storm activity, will require suitably strong foundations and fixtures. These features, alongside strong currents and a significant tidal range will combine to create a challenging environment for development, and this should be acknowledged in the JMSP and the offshore wind consultation response.</p> <p>That being said, the JMSP highlights that the area in question scored relatively low on the ecosystem services assessment and is not an area of high fishing or shipping activity (with the exception of southern component of the region). As such, despite the more difficult seabed conditions, we view this as an excellent opportunity for future development. Furthermore, development in this region can adequately avoid negative impact on marine mammals and seabirds that may be in the region during given seasons.</p> <p>Our own aerial surveys have confirmed the fixed gear fishing activity in the southern portion of the area and we are confident that fixed gear fishing effort and a fixed bottom offshore wind farm can co-exist, with little disruption post-construction.</p> <p>Following the outcome of the government's offshore wind consultation, we would encourage that the spatial extent of the offshore wind farm option is adopted into the JMSP and a plan-level environmental assessment is carried out to further confirm the level of expected positive and negative impacts on the</p>		
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			<p>environment.</p> <p>The JMSP and the current offshore wind consultation are unclear on the intended mechanism to utilise the electricity generated by an offshore wind farm. If the power generated should be supplied directly to the island, there will be a need to consider cable corridors and landing sites. Closer to shore, the JMSP has identified a number of sensitivities that should be considered. The JMSP is an excellent opportunity to also consider and assess those sensitivities and suggest preferred cable routes to shore. In addition, any onshore components required should be assessed and considered in line with the Bridging Islands Plan and suitable regulatory processes should be set up to consider all aspects of an offshore wind project. These can be further examined through detailed survey and assessment as part of any project application.</p> <p>In addition to the points above, we would also highlight that existing vessel traffic in the region will influence any offshore wind project. However, the use of best practice designs and layouts would allow much of the negative impact to be mitigated, especially given the clear routes as shown in the JMSP.</p> <p>Whilst not strictly for the JMSP to resolve, the potential for interference with radar and aviation should also be considered. Any wind farm project will have to be sufficiently distant from the airport radar to minimise interference. This will directly shape the position and layout of a project. In order to maximise the potential opportunity, a sufficient buffer should be applied that would help minimise interference with radar.</p> <p>Marine Protected Areas and loss of fishing grounds: The JMSP has very clearly set out the case for the extension of Marine Protected Areas ("MPA") and developing the legislation required to deliver management measures within these areas.</p> <p>As the primary concern is the impact of certain fishing methods, the MPAs will exclude mobile fishing activity. For fishers, this may lead to loss of fishing grounds and potential displacement into other areas. It is a common view that offshore wind development will also lead to fisheries exclusions and further displacement. We would like to highlight that the area of interest for offshore wind is not an area of high fishing activity and mobile effort is only found to the north of the region where the sediment is more substantial.</p> <p>Furthermore, our development ambition would use fixed foundations that can</p>		
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			<p>happily co-exist with fixed fishing gear, which is the activity currently practiced in the region. Beyond disturbance during necessary survey and construction phases, the impact would be minimal. As the JMSP highlights, the wind farm itself may act as a benefit to fishing effort in the region due to the structures providing areas where species may accumulate and Nature Positive designs could offer additional benefit opportunities. In Scotland we have seen fixed gear fishing move into a floating offshore wind farm location. The structures on the seabed may provide shelter for target species and the floating wind farm array protects gear from mobile fishing effort.</p> <p>The updated JMSP should clarify the expectations around co-existence of offshore wind and fisheries and set out a clear, evidence-based approach to any conflict management.</p>		
JMSP-581511854	Engagement	Guernsey Environment and Infrastructure	<p>The Committee would like to thank the officers who arranged the consultation workshop in Guernsey, and associated materials, which explained the work undertaken to produce a draft Marine Spatial Plan (MSP) for Jersey's waters. It was very helpful to gain a better understanding of the evidence used to inform the list of priority actions that the MSP presents. It is recognised that the marine environment is not limited by jurisdictional boundaries and therefore it is imperative that we continue to work together to get the best outcomes for both Jersey and Guernsey, both in terms of our people and nature. This balance is one which is clearly articulated within Jersey's MSP.</p> <p>The States of Guernsey welcomes the engagement on the MSP for Jersey waters and broadly support the priority actions that it contains. We look forward to continuing our joint working as we develop our own Marine Spatial Plan. At this stage we would like to make the following comments: The extension of Marine Protected Areas (MPAs) within Jersey's waters is noted and the ecosystem-based approach to their identification is recognised internationally as best practice. The evidence used to define their boundaries is clearly communicated within the plan. In time, we would welcome more information about how activities might be assessed against the objectives of the MPAs when they do have a statutory basis and what requirement, if any, that might place on activities within Guernsey waters. The plan identifies a potential area of search for utility scale offshore wind energy generation. Given the potential scale of the development and the location, there is the potential for its development to impact on the biodiversity and economic interests within Guernsey's jurisdiction. We would therefore wish to continue our close working relationship on this topic with the aims of further exploring areas of mutual benefit and identifying potential impacts early so they are mitigated as far as possible. The Committee looks forward to receiving the finalised MSP in due course but,</p>	No	Jersey will continue to work with neighbouring jurisdictions.

			in the meantime, do not hesitate to contact me if you have any queries about this response.		
JMSP-581246680	MSP	JASP	JASP is highly supportive of the objectives of the MSP to better zone and manage Jersey's marine environment on this spatial basis, taking an evidence-based approach. We urge the Government of Jersey to continue this work and to adopt the Marine Spatial Plan as soon as possible.	No	General comment of support.
JMSP-581246680	Seabed protection	JASP	JASP is highly supportive of initiatives to support a blue carbon economy in the context of the net zero transition and also the Biodiversity Protocol. Is there more that could be done to protect and grow the seagrass meadows? Some members felt that the Plan could be more ambitious with regards to natural environment protection in this context. They questioned the no-take zone at 0.08% of Jersey waters (pages 138-139) and thought this was much too small – they suggest in the order of 5%.	No	Recommendation NB6 for seagrass management areas will aid in the protection of seagrass, further protection for seagrass is not being considered at this time as it is generally in good health and already expanding in areas. There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed.
JMSP-581246680	Watersports	JASP	Some of our members felt this needed to include much tougher rules and limitations on jet skis, which have become somewhat of a scourge on popular beaches for swimmers and children and should not be permitted in those areas given the safety risks, and in some cases the environmental damage.	No	This will be addressed by priorities RT1 and RT2

JMSP-581246680	Water quality	JASP	Some of our members want to see further measures to reduce the use of motorised vehicles in Jersey waters. One suggestion is a prohibitive polluter-pays type tax hypothecated back to the Climate Emergency Fund or a future nature-related equivalent.	No	Outside of scope of the JMSP
JMSP-581511868	Terminology	JEC	<p>Replace the following “CIEG” references with “JE Plc and GEL”</p> <ul style="list-style-type: none"> • 6 CIEG references in the responsibility column of IT1a, IT1b, IT1c, IT1d and SC1a • 1 CIEG reference in the status column of IT4a <p>P.255: Appendix E, remove the CIEG acronym and definition</p> <p>Page.24: Replace “Jersey Electricity Company” with “Jersey Electricity Plc”.</p> <p>Page.194: Cover image reference, replace “Channel Islands Electricity Grid” with “Jersey Electricity Plc”</p> <p>Page.200: Both image references, replace “Channel Islands Electricity Grid” with “Jersey Electricity Plc”</p> <p>Page.202: Note 1 at the bottom of the page, replace “Channel Islands Electricity Grid Ltd” with “Jersey Electricity Plc”.</p> <p>Page.203: Additional action required – IT1f: Provision will be made for new cable installations along new routes to offshore renewable locations or interconnector sites.</p>	Yes	Amendments made as requested.
JMSP-564521345	Beach management	Jersey Adventures	Page 222 point FA2D and page 230 RT6A / RT6B. There are unacceptable amounts of litter in our waters and it NEEDS to be addressed for the benefit of ALL. I support a coastal warden scheme. Littering and environmental abuse should should be criminalised with hefty fines for offenders.	Yes	References to beach wardens have been added to section 11.5.3 in paragraph 1 and in action RT6a.
JMSP-580771412	Seabed protection	Jersey Biodiversity Centre	<p>Marine Habitats and Marine Protected Areas: I support Priorities NB1-6 and associated actions.</p> <p>If implemented and adequately enforced, it is my view that the proposed network of Marine Protected Area’s (MPA’s) detailed in the plan would represent a significant step towards the sustainable management of Jersey’s territorial waters.</p> <p>The Marine Spatial Plan (MSP) public consultation draft document has identified</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

			<p>the most ecologically valuable sites for protection based on the available scientific evidence.</p> <p>The proposed network of MPA's would deliver a variety of long-term benefits for the environment, society, and the economy. By safeguarding the proposed areas, it is expected that priority habitats and marine species will recover, biodiversity will increase, and Jersey's territorial waters will become more resilient to the impacts of climate change.</p> <p>The establishment of the proposed MPA network is also likely to contribute to the conservation of commercially important species such as crab and lobster. As a result, the proposed MPA network will likely support low-impact, static forms of commercial and recreational fishing, which can continue to operate within the MPA boundaries.</p> <p>The establishment of the proposed MPA network is also expected to contribute to the long-term conservation of commercially important species like Crab and Lobster. This would support the long-term sustainability of low-impact, static forms of commercial and recreational fishing that would still be able to take place within MPA boundaries.</p> <p>Expanding Jersey's network of MPA's to cover 27% of territorial waters would represent a significant step towards fulfilling the Global Biodiversity Framework's target of safeguarding 30% of land and sea within protected areas by 2030.</p>		
JMSP-580771412	Seabed protection	Jersey Biodiversity Centre	<p>Commercial Fishing and Aquaculture: I support Priority FA5 as an important positive step towards sustainable marine resource management.</p> <p>While the Proposed MPA network would outlaw the most destructive fishing practices (dredging and trawling) from taking place within the most important and biodiverse areas, destructive fishing activities will still be permitted to take place within 70% of Jersey's territorial waters.</p> <p>Ultimately, transitioning away from destructive fishing practices is the key to the future of healthy marine ecosystems and sustainable fisheries. The addition of a further action to facilitate and support this transition is therefore highly desirable.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

JMSP-580771412	Artificial reefs	Jersey Biodiversity Centre	<p>Future Expansion of the MPA Network:</p> <p>I fully support the MSP public consultation draft proposition to identify areas where further research should be targeted to guide the future expansion of the MPA network.</p> <p>Further research on tides and currents and their impact on populations and metapopulations of important marine species in Jersey's territorial waters would help in identifying the next most important areas to protect when expanding the MPA network in the future.</p> <p>The placement of artificial structures could aid the restoration of degraded areas as part of the future expansion of the MPA network. In areas of the sea affected by bottom trawling, marine life has been found to be significantly more abundant in and around shipwrecks (Hickman et al. 2023). Shipwrecks and other artificial structures provide areas of high habitat complexity and a refuge for many species (potentially including species of conservation priority) unable to survive in a heavily trawled environment.</p> <p>Fishing boats engaging in destructive fishing practices typically avoid areas containing such structures, as they can represent a danger to the boat and gear.</p>	Yes	A sentence has been added at end of 8.6.9 regarding the consideration of biodiversity aids in the restoration of degraded habitats. A new action added (NB5e).
JMSP-580771412	Climate	Jersey Biodiversity Centre	<p>Blue Carbon:</p> <p>It is essential to continue refining the accuracy of blue carbon sequestration calculations and monitor the condition and extent of habitats known to be important blue carbon sinks. Additionally, it is crucial to recognise that seabed trawling is a major source of CO2 emissions.</p> <p>Bottom trawling releases large amounts of carbon dioxide from the seabed and much of this gas gets into the atmosphere (Atwood et al. 2024).</p> <p>Establishing the CO2 emissions associated with trawling in Jersey's territorial waters would enable the government to determine whether those emissions should be regulated.</p>	Yes	This will be addressed by the current Carbon Neutral Roadmap policies SP5 and EN5. This has been added to the text in section 8.6.6. in addition to reference to the potential effects of disruption of seabed on carbon release.
JMSP-580771412	Access	Jersey Biodiversity Centre	<p>Recreation and Tourism:</p> <p>I am in support of Priority RT3 to promote and better manage access to the marine environment for the benefit of all.</p>	No	General statement of support - no action necessary.

JMSP-580771412	Management	Jersey Biodiversity Centre	<p>Survey, Surveillance and Monitoring: Ultimately, management decisions will only be as good as the evidence base underpinning them. As alluded to in the MSP public consultation drafts Guiding Principles, monitoring and review must be recognised as integral components of the MSP.</p> <p>For the MSP to work effectively as an operational plan, it is crucial to determine the plan's monitoring and surveillance requirements. This includes identifying the most suitable approaches and methodologies to gather the required information.</p> <p>To meet the monitoring and surveillance requirements of the MSP, it will be necessary for professional and citizen scientists from a variety of organisations to work together in partnership.</p> <p>Ensuring adequate resources are available to coordinate and support ongoing monitoring and surveillance work is essential.</p>	Yes	An additional priority have been added (NB5f) regarding collaborative working.
JMSP-580771412	Education	Jersey Biodiversity Centre	<p>Environmental Education: Regarding the actions outlined in priority RT6, which aim to increase public education and awareness, I propose an additional action. This would involve coordinating and supporting the existing education and awareness initiatives already being carried out by various environmental organisations. Such an action would encourage partnership working, facilitate knowledge and resource sharing, avoid duplication of efforts, and help to ensure that the Island's marine environmental education requirements are met.</p> <p>An example of a similar existing initiative, albeit with a slightly different focus, is the Environmental Educators Forum. The forum, which is facilitated by the GoJ Climate Change team, focuses on helping schools deliver quality environmental education.</p>	Yes	A new priority (NB7) has been added regarding a Marine Environment Visitor Centre Priority RT6 also addresses marine awareness.
JMSP-580771412	Access	Jersey Biodiversity Centre	<p>Infrastructure, Energy and Transport: When planning essential coastal defence works, it's important to consider opportunities for improved access like footpaths and cycle paths.</p>	No	This will be addressed by priority RT3 to promote and manage access to the marine environment for the benefit of all
JMSP-580771412	Infrastructure	Jersey Biodiversity Centre	I support Priority IT9 to explore the potential for a Jersey-based maritime hub.	No	General comment of support.

JMSP-580771412	Renewable energy	Jersey Biodiversity Centre	I support Priorities IT4 and IT5 to support the principle of utility-scale offshore wind generation in the southwestern part of the Bailiwick and to investigate the potential of using tidal power to generate electricity within Jersey's waters.	No	General comment of support.
JMSP-581192837	Economic development	Jersey Business	<p>There is a danger that the decline of our Professional Fishing fleet (circa 58 boats pre-BREXIT and COVID, to under 30 at the end of December 2023) will continue as it is becoming increasingly difficult for our fishers to operate profitable businesses.</p> <p>Commercial fishing in Jersey is quite a small industry, however its importance is much more than catch and profitability. It is also about our heritage, our national identity and plays an important part in our social fabric.</p> <p>The MSP as it is currently set out could have an adverse effect on our Commercial Fishing Fleet (over 90% of their catch is exported, with the majority going to France, Italy, Spain and Portugal).</p> <p>Our neighbours in Normandy through Le Cotentin Terre Bleue (https://lecotentin.fr/terre-bleue-le-cotentin) are committed to invest, modernise and support their fisheries and aquaculture sectors.</p> <p>Some ideas and suggestions:</p> <ul style="list-style-type: none"> • As part of this consultation's outcome, the Department for the Economy could undertake an Economic Impact Assessment to determine what impact the MSP will have on Jersey's Commercial Fishing fleet when implemented. They could do this by analysing the fleet/catch data at the end of 2023 and evaluating it against the MSP's key objectives. • The MSP would appear to have very limited impact on Registered Fisherman from both Normandy and Brittany who use our waters daily and take over 80% of total fish and shellfish caught within our territorial sea. On the basis that most catches are by French boats, it would be unfair to target only Jersey boats. If we are to make changes, they should be applied to all professional full-time 	No	This will primarily be addressed through the Marine Economic Framework work and through a Business Impact Assessment that will be carried out on the final proposed MPA boundaries. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. Aquaculture comments are outside the scope of the JMSP.

			<p>fisherman. It should be noted that currently there is no economic benefit to Jersey from Normandy or Brittany fisherman when they fish in our waters, and the Government of Jersey has a significant annual budget to monitor our seas with a marine patrol vessel.</p> <ul style="list-style-type: none"> • It is important to note that a high volume of the proposed protected zones are within the 3-mile limit, when circa 80% of all catches are by French boats that cannot enter the 3-mile zone. • While the outcome of the MSP is still to be seen, there is the potential for Jersey commercial fishing boats to lose areas where they have traditionally fished. If this happens, consideration should be made for focused support and encouragement on new potential marine industries so that businesses are not forced to close. • Responsible and sustainable fishing is vital to help maintain healthy fish stock levels. Will the MSP include measures like seeding juvenile shellfish and prohibiting the capture of pregnant lobsters to support the recovery of Chancre Crab and Lobster populations, which are currently declining? If these measures can not be included, the potential for a Lobster Hatchery exists. (examples: https://whitbylobsterhatchery.co.uk/about , https://www.kinglobsters.com). Lobster is Jersey's most valuable commercial species, with landings accounting for around half of the fishing fleet's annual income. • Seaweed – Jersey has yet to develop seaweed farming. This is something that could be looked into further, as there is potential for growth and export of seaweed products. A report was carried out in 2019 (Seaweed Aquaculture and Wild Harvesting in Jersey 2019 https://www.gov.je/Government/Pages/StatesReports.aspx?ReportID=4713) however we haven't seen any commercial entrants to this yet. There is potential for creating high value products from low volume and sustainable seaweed catch. An example of a company doing this in Guernsey is https://guernseyseaweed.com/ • Oyster Farming – Jersey is the largest producer of oysters in the UK, with our huge tidal range and some of the cleanest seawater in Europe, Jersey is the perfect place to farm high quality oysters. Jersey Oysters are farmed in the Royal Bay of Grouville, which is the largest area of cultivated oysters in the British Isles. Over 85% of all farmed oysters are exported and they are a great example 		
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			of sustainable food production as they do not require any additional feed and they help to improve water quality. There is potential to grow this industry even further for export.		
JMSP-581201241	Tourism	Jersey Business	<ul style="list-style-type: none"> • The Marine Spatial Plan should consider its alignment with the recently published Visitor Economy Strategy. Misalignment between the MSP and VES could create barriers to each of meeting their goals. • The VES defines their goal “To be a globally recognised, sustainable and enriching destination that Islanders are proud to share”. Of which the natural environment, including the marine environment, plays a considerable part. • The need for new hotel sites: There are concerns around declining tourism bed stock on the island and whilst this doesn’t directly the effect the marine environment as hotels are (usually) on shore, there is a relationship with the marine environment when identifying potential new hotel sites. • Access to the coast and marine environment: The MSP lays out an aspiration for islanders and visitors to enjoy the coast and marine environment for recreational purposes. However, there are currently challenges with access to the some of the islands most popular beaches such as Greve de Lecq and Plemont, which need to be considered. Greve de Lecq lost a reasonable % of car parking spaces, as well as an ‘experience’ for coach tour groups when the Seaside Cafe closed. • Plemont Cafe was impacted in 2022 by a reduction in parking, as well as the closest bus stop being decommissioned, making it considerably harder for customers to visit. Margins within hospitality businesses are often low and these changes can be impactful to the sustainability of businesses. • Event Tourism: The coastal and marine environment can play an important role in hosting events. These need to be considered in relation to the benefits to the island and visitor economy, local residents health and wellbeing, and any environmental impacts – but the MSP should encourage the enabling of such activities. Examples include: the Super League Triathlon (https://superleaguetriathlon.com/event/jersey21/) The Breca Swim/Run (https://www.jersey.com/things-to-do/events/listings/jersey-swimrun/) The Jersey Triathlon 	No	Hotels, cafes and events are outside of the scope of the JMSP but access and parking will be addressed by priorities RT3 and RT4

			<p>Beach Polo (https://www.sandpolo.com/) Horse Racing (https://laytownstrandaces.ie/wp2/)</p> <p>Some of these also showcase Jersey in off-island media.</p> <p>Some of above points are referenced in the MSP (see below), it is important that the MSP not only aligns with other strategies such as VES, but also considers access / transport inc car parks, bikes and buses.</p> <ul style="list-style-type: none"> • 3.3 Consultation – Identifies a need for better access to beaches and the sea, with more parking, more bike racks and better bus routes. • 7.0 Seascapes – importance of consideration of the views of landscape and seascape. • 12.6 / 12.7 - Renewable energies. 		
JMSP-581203578	Renewable energy	Jersey Business	<p>From an economic point of view, Jersey has an aging population and over the next 20 years we will have a very high proportion of over 80 year old's. Due to this it is highly likely that the current working population will have shrunk, and as Jersey is reliant on personal taxation for income, based on our current tax model we will most likely have less tax revenue to run our public services on.</p> <p>To mitigate the loss of tax revenue, the Windfarm opportunity has the potential to generate at today's prices circa £70m+ in new Government income.</p> <p>In addition, new jobs will be created to maintain and operate the Windfarm and other complimentary new commercial opportunities, such as seaweed farming, can add further value.</p> <p>The windfarm could also provide Jersey (people and businesses) with improved energy security at prices that are under our control. Pending a successful feasibility study, including seabed surveys and environmental assessments conducted by contractors with proven capability and licenses that work for both Jersey and business operators, this project can benefit our population for decades.</p>	No	Outside of scope of the JMSP - the JMSP does not go into the detail of a windfarm as Jersey is only in the early stages of investigating a windfarm following the approval of the proposal to the States (P82-2023). Local stakeholder and neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced."

JMSP-581203578	Renewable energy	Jersey Business	<p>From an economic point of view, with our considerable tidal movements, tidal power can be seen as an obvious solution to help us produce more of our own energy and therefore improve our energy security.</p> <p>However, at this point, the capital expenditure for infrastructure is very high and the concept is yet to be a proven model, unlike Windfarm energy.</p>	No	This will be addressed by priority IT5.
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JMSP-579841253	Infrastructure	Jersey Fishermen's association	Within the first draft of MSP is a proposed exclusion zone around GJ1 and GJ2 cables. The JFA very strongly rejects the proposal or indeed any notion of restricted access to traditional fishing grounds, given that all the dialogue surrounding the route of the cables through productive fishing grounds and the need to ensure continued access for fishing, had already taken place prior to the laying of the cables. Much of the dialogue will be minuted in the Marine Resources Panel meetings of that era (1980s?)	Yes	Action IT2b regarding protection of the Guernsey electricity cable has been updated.
JMSP-579841253	Seabed protection	Jersey Fishermen's association	Chart submitted for comment to Marine Resources, includes amendments to MPA zones.	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511855	Fishing restrictions	Jersey Fishermen's association	The principle of comparative best usage of the areas to which the fleet requires continued access is fundamental to this submission. The JFA hold that, along with the notion of comparative best usage, our established marine economy, along with the potential for future growth, is an element which must feature with equal significance in the process of delivering a marine spatial plan, as any other criteria.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511855	Renewable energy	Jersey Fishermen's association	By way of example, with reference to comparative best usage, we note that within the same timeframe as the production of a marine spatial plan, Jersey's environment minister has issued a public statement and a consultation exercise based on plans to develop a large wind-farm in Jersey's sea area to the SW of Corbiere. Hence the use of the comparative best usage principle, as the proposed windfarm is located in an area known to be important for a number of important fish and shellfish species including Bluefin Tuna. Clearly the minister considers that the impact and extreme disturbance of the seabed in that area for the purpose of a windfarm, to be acceptable and the concept of a wind-farm to be of greater importance than protection of habitat and the health of the many important fish species that rely on the area.	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. Outside of scope of the JMSP - the JMSP does not go into the detail of a windfarm as Jersey is only in the early stages of investigating a windfarm following the approval of the proposal to the States (P82-2023). Local stakeholder and neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment

					and consenting process for offshore renewable energy developments should be introduced." A Business Impact Assessment will be carried out on the final proposed MPA boundaries.
JMSP-581511855	Seabed protection	Jersey Fishermen's association	<p>See JFA MK2 chart in submitted documents. The chart; For clarity , we refer to specific areas or zones for continued access on the chart, by the numbers as illustrated on the chart.</p> <p>Straight Lines; It should be noted that in the interests of all concerned and for obvious reasons, the JFA proposed chart uses straight lines to define the perimeters of the Marine protected area and access zones, (as opposed to the series of arcs used on the chart proposed by the Environment/MSP team). Additionally, wherever possible these lines run parallel to lat long lines and in a number of instances the lines are set to correspond with round numbers of latitude or longitude. e.g. ref point 11 sits at 49°08.50 x 02.15.50. Other lines use well known landmarks or seabed features as reference points.</p> <p>Seasonal Access; To be noted also that the the JFA chart specifies some areas under the principle of "temporal or seasonal access". It is the view of the JFA, that protection of breeding, spawning or nesting areas for important fish species is of equal validity as protection of any other sensitive habitat. The value of such seasonal access areas and the need for closure to mobile gear is best defined around the known seasonality of the species concerned . This represents a more pragmatic approach than total closure.</p> <p>Within the first draft of MSP is a proposed exclusion zone around GJ1and GJ2 cables. The JFA very strongly rejects the proposal or indeed any notion of restricted access to traditional fishing grounds, given that all the dialogue surrounding the route of the cables through productive fishing grounds and the need to ensure continued access for fishing, had already taken place prior to the laying of the cables. Much of the dialogue will be minuted in the Marine Resources Panel meetings of that era (1980s?)</p> <p>The Zones. In numerical order along with numbered reference points as follows;</p> <p>Zone 1; is the area extending from the existing limits within St Aubins bay extending out to Ref point No 10 due south of Noirmont point in the Southwest, to ref point 9 in the SE (to the SE of Demi des Pas pas light). This zone</p>	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

			<p>represents an important and productive area which has been fished, mainly for scallops for decades. It is the case that the area constitutes an important lifeline to those local boats, practically all of which are under ten meters, during periods of poor weather. No seasonality has been attached to the zone, however neither has it been ruled out.</p> <p>Zone 2; working around the island clockwise to the south and west the JFA chart proposes an enlarged area for protection from Noirmont to Corbiere using ref points ten and eleven encompassing the known kelp reefs/beds SW of Noirmont, along with the banc known as the Jumenté banc. This then leads to Zone 2 which is effectively the Corbiere banc, otherwise known as the Great Banc. This is to be a seasonal access area closed during the summer months and open during the winter months on roughly 6 monthly cycles. It is an area which has been fished using mainly trawl gear for decades and is crucial to the existence of a local sector targeting finfish targeting skates, rays & finfish, the banc being a very productive area for those species.. The eastern limit line of zone 2 runs due North-South, while the Northern limit is set on a NW-SE line running from Rocco Tower to West Rock.</p> <p>Zone 3(a&b); heading North from zone 2 is an enlarged protected area for kelp focused around St Ouens Bay and the Rigdon banc. This then leads to access zones 3a and 3b set around the paternosters reef. 3A is a seasonal access area to the SW of the Paternosters reef and is an important area traditionally accessed by our local fleet using the demersal trawl métier. As with the Corbiere banc it is an essential zone for the finfish sector with skates rays and flatfish the target species.</p> <p>3b is to the NE of Paternosters and is a productive and important area for the scallop sector. No particular case has been made for seasonality, however it has not been ruled out either. The timeframe for any seasonality on 3b would almost certainly align with the nearby zone 5, but not align with zone 4</p> <p>Zone 4; is another seasonal access zone which focuses specifically on the banc known as the Plemont Deep banc where there is a long history of trawling for skates and rays. Western limit is defined by a N-S longitude line running from ref points fourteen to fifteen. While it is a relatively small area it is nevertheless extremely important, particularly given that our local fleet currently only has exclusive access to a small number of areas for finfish within Jersey's 3nm. Traditional areas beyond the 3nm where the much more powerful french fleet have access, do not and cannot sustain a small scale fleet such as ours due to the almost constant effort and activity of powerful french trawlers .</p>		
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			<p>As with the Corbiere banc seasonality is anticipated, based on a summer closure, with winter months opening.</p> <p>Zone 5; links to zone 4 geographically ,but represents an important area for our scallop fishery rather than the finfish sector. The location on the North coast provides for semi sheltered access during periods of poor weather from the south. It is important to note that while seasonality is proposed for this zone, being a scallop production area, it will differ from zone 4 where seasonality is centered around finfish .</p> <p>Zone 6; from zone 5 there is then another fully protected area of North coast with its western edge on a N-S longitude line on ref points 16 & 17, to run north either from La Crete point or to use longitude 02.06.50. This protected area continues eastward to St Catherines breakwater where a line is proposed running NE to Maitre isle. This leads to the larger access zone 6, where there is an extremely important scallop fishery. This is a zone which again enables fishing in relatively sheltered conditions during heavy weather from the prevailing westerly conditions. Fishing for scallops in this zone and in earlier times, for oysters has been going on for centuries. The area represents the most productive area for our mobile gear fleet to which access is absolutely critical. The JFA hold that the combined production of zones 1, 3b, 5 & 6 (all within our 3nm limit) represents around 80% of the entire scallop production of the Jersey fleet, with Zone 6 being by far the most important .</p> <p>Exclusion from this area would beyond doubt have catastrophic implications for the island's fishing and broader marine economy, including the merchant and export sector. It would likely also have negative implications for the hospitality sector. Zone 6 covers an area which to the South is defined mainly by existing lines surrounding the protected area of the Violette banc, Anquettes area.</p> <p>Zones 7. From zone 6 there is an exclusion zone, which is to a large extent, already defined and closed for protection of mearl. There is a small amendment proposed to the MPA Southern limit line after which there is a seasonal access area, zone 7, focused specifically on the well known Frouquier Box bream nesting grounds.</p> <p>Zone 8; is part of the area to the west of Les Minquiers where access is required for the scallop sector but where there is a small Bream nesting area on the Northern edge. Our scallop fishery in the broader NW Minquiers area has existed for decades. Seasonality for the bream nesting grounds which forms part of zone 8 will coincide with the known breeding season while seasonality to the wider area has neither been proposed nor ruled out.</p>		
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			<p>Zone 9 is to the South east of Minquiers and is specifically proposed as an important area for scallop production.</p> <p>The JFA considers that the proposed chart, along with the qualifying points for each zone as above, represents a reasoned and measured response to the first draft MSP.</p> <p>The numerous other issues, most of which have been raised already by individuals concerned with the broader marine economy, such as the negative effects of displacement and increased carbon footprint resulting from having to import our seafood in the case of loss of our fishing fleet, all remain valid but need not be included as part of this submission.</p>		
JMSP-581511838	Heritage	Jersey Heritage	<p>Jersey Heritage has been an early consultee with the MSP discussions and many of the points raised and suggestions made are already incorporated into the public draft.</p> <p>These further comments re-emphasise key points in relation to the cultural and archaeological heritage, with a few observations on the content of the text.</p> <p>The prominence of cultural heritage considerations is very much welcomed throughout the document. This is perhaps less obvious in the 'Purposes of the JMSP' (p8 1.2), which could include informing the understanding and protection of the cultural / archaeological heritage.</p> <p>To re-emphasise this key point, Jersey's underwater cultural heritage is subject to international convention. Archaeological heritage is the focus of the Valletta Convention (Council of Europe, 1992), whereby each signatory undertook to create and maintain an inventory and to protect both specific sites and areas of archaeological importance – requiring a legal system for the protection of archaeological heritage including underwater remains. As recognised in the public draft, there are believed to be remains of very high archaeological importance that have been overwhelmed by rising sea levels since the last Ice Age, and there are records of some 400 wreck sites around the Island, only a small number of which have yet been located.</p> <p>In addition, the Underwater Cultural Heritage Convention (UNESCO, 2001) responded to the increased threat to seabed archaeology from excavation and salvage operations that had long been recognised. It extended the principle of preservation in-situ as the first choice from land to seabed heritage and proscribed commercial exploitation but not properly organised and funded</p>	Yes	Cultural heritage has been added into section 1.6 - Guiding principles. Specific mention of conventions has been added to 10.1.3.

			research. It was accompanied by an Annex of 36 rules concerning activities directed at underwater cultural heritage. Although the UK Government has not ratified the Convention it has endorsed, through the simple device of an announcement in the House of Commons (Appendix 2), the provisions of the Annex as representing best practice. This means that it has pledged to take into account the preference for preservation in-situ and strict regulation of excavation in its own decision-making. This was recently tested in relation to the wreck of HMS Victory (1744), when an original decision to allow salvage operations on this British vessel in international waters, not far from Jersey's territorial limit, was reversed. The Convention has been ratified or accepted by 64 countries around the world and the Annex is accepted as best practice across the underwater archaeology community. The main advantage of the Government of Jersey following suit would be to bring the States closer into line with the undertakings of the Valletta Convention.		
JMSP-581511838	Heritage	Jersey Heritage	Jersey Heritage is supportive of the new initiatives reflected in Priority SC2: Marine landmarks - to protect marine landmarks; and Priority CH1: Coastal structures - to protect working coastal infrastructure and landscapes of historic or cultural interest, and their settings.	No	General comment of support.
JMSP-581511838	Heritage	Jersey Heritage	<p>p154 10.3.1 – in relation to the section which states, ‘unlike earlier defences against French invasion, the German structures are principally located on the west and south coasts, where they formed part of Hitler’s ‘Atlantic Wall’, there are also significant German structures along the east coast of the Island, and many of the pre-existing earlier defences were utilised and modified by the German forces.</p> <p>References in the MSP should include the Jersey Heritage ‘Conservation Management Plan: German Military Sites in Jersey’, which is in final draft form and will be published in early 2024.</p>	Yes	Text regarding German defences has been corrected in 10.3.1. and reference to Conservation Management Plan for German Military Sites in Jersey has been added to section 10.3.1 and in the Evidence Base.
JMSP-581511838	Heritage	Jersey Heritage	p157 10.4.2 – a slight adjustment to the following text is required, ‘although the coastal prehistoric sites are above the high water mark they extend into the intertidal and marine environments’ as the sea incursion into La Cotte de St Brelade has been a major issue requiring construction of the gabion wall.	Yes	Section 10.4.2 paragraph 1 has been rephrased as requested.

JMSP-581511838	Heritage	Jersey Heritage	<p>To re-emphasise this key point - Priority CH5: Submerged landscapes survey - to undertake a seabed survey of the subtidal area, is a crucial piece of work to move forward in the understanding and protection of the underwater cultural heritage. A seabed mapping survey would complement the recent lidar survey of the island and provide a baseline dataset that can inform the understanding, appreciation, and management of historic wrecks, submerged prehistoric landscapes and other related coastal and marine heritage assets. The survey should use MBES as there are internationally recognised standards for MBES survey that encompass regional scale survey but also more detailed survey of specific features such as wrecks. In particular, the UK Civil Hydrography Programme operates standard specifications for MBES survey. Data acquired to these specifications is suitable for a wide range of archaeological purposes.</p> <p>It's worth noting that Priority CH7: Wreck sites - To protect the significance of wreck sites and their contexts, will require the development of bespoke designation criteria.</p>	Yes	Specific reference to MBES survey has been added to section 10.6.3, and to action CH5a. MBES has been added to the glossary. An extra sentence has been added to section 10.8.3 and to action CH7a to say that these criteria will need to be determined.
JMSP-579439746	MSP	Jersey Kayak Adventures	<p>1.4 It is in Jersey's interest to have an MSP to avoid the future danger of complying with any changes in the UK and International agreements. Increasingly, the management of marine areas is becoming more critical. In business, for example, early adopters often gain significant benefits.</p> <p>1.6 A good point is that "The JMSP is in accord with current Governmental policy objectives and contributes to the Seven Priorities for Change in the Common Strategic Policy 2023–2026" Having a plan is already recognised as necessary, so now it needs to be adopted.</p> <p>1.7 The GofJ has already committed to having an MSP: "Preparing a Marine Spatial Plan for Jersey is also a policy within Jersey's Economic Framework for the Marine Environment (2022) and the Carbon Neutral Roadmap (2022)". Hopefully, the adoption of the MSP will not be subject to the policy reversals that are characteristic of the States Assembly.</p> <p>4.21, 4.22. Good points. We must recognise that the general direction of travel is to have an MSP, as can be seen by the development of MSPs by our neighbours.</p>	No	General comment of support.
JMSP-579439746	Seascapes	Jersey Kayak Adventures	<p>Good point "Development proposals in the countryside, around the coast and in the marine environment should protect or improve its character and distinctiveness. They should also protect or improve the special landscape and seascape character of the Protected Coastal Area".</p> <p>There needs to be more consideration of the visual impact of development on the coast when viewed from the sea, not just how it looks on the land.</p>	Yes	Section 7.1.1 paragraph 3 has been amended to specifically refer to views from the sea. Priority SC2 has also been amended.

			Action SC2a: Highlights the above but also needs to consider the impact of development around the coastal areas both from the land and towards the land.		
JMSP-579439746	Seabed protection	Jersey Kayak Adventures	Priority FA1/NB1: No Take Zones This is a proportional approach and recognises the damage some fishing methods can have.	No	General comment of support.
JMSP-579439746	Conservation	Jersey Kayak Adventures	Priority NB2: Ramsar Sites: A good idea but needs funding. Priority NB3: Intertidal Sites of Special Interest. There is also the need to actively highlight and educate people on the significance of these areas. The proposed GeoPark may be a good vehicle for this to happen. Priority NB4: Priority Areas for designation as Areas of Special Protection (ASPs). The requirement for more discussion with users and not just residents and land owners also needs to be included. For example, the current framework does not require Les Écréhous ASP to consult with users/public other than land owners and residents. "No public consultation is required under the Law, only that owners and occupiers are notified and their comments considered". (Email from Environment Manager). This approach seems to run counter to elements of the MSP that write of the need to have a dialogue with stakeholders.	Yes	This will be addressed by priority NB4 but consideration to current users, residents and operators had been highlighted in section 8.5.5 and in action NB4a.
JMSP-579439746	Seabed protection	Jersey Kayak Adventures	Priority NB5: Marine Protected Areas (MPAs). Good point. There is strong evidence of the benefits of stopping the use of mobile fishing gear in these important areas. 9J. Straight lines designating the areas are easier to navigate than the curves on the map.	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-579439746	Beach management	Jersey Kayak Adventures	FA1 and FA2. Good idea. Beach cleans may be very good, but the aim should be to develop methods to reduce lost fishing gear landing on beaches. Better identification and tracking of gear and involving government/fishers in retrieving lost gear should be included. FA5b. Is there scope to look at the opportunities to recycle and refurbish some of this gear.	No	This is already addressed by current priorities and actions and is also being addressed through a collaborative recycling scheme between Marine Resources, Ports of Jersey, Solid Waste, Jersey Fishermen's Association, and the Jersey Prison Service.

JMSP-579439746	Archaeology	Jersey Kayak Adventures	<p>10.5. Include les Dirouilles, which some have identified as a possible archaeological site.</p> <p>Priority CH4: Intertidal archaeology. Action is needed to avoid further damage to potential sites due to the lack of awareness that these sites exist.</p>	Yes	The dirouilles has been added to Figure 10c.
JMSP-579439746	Cultural Heritage	Jersey Kayak Adventures	<p>Priority CH6: Culturally-significant navigation markers. It's a very good priority. These are important cultural features that need to be protected. Some old Pilotage books include the features on houses that were used to make transits, so these should also be recognised. While modern electronic navigation aids may make these physical reference points less important, seeing that you are in the right (and hopefully not the wrong) place with your own eyes and not just on a TV screen when navigating is reassuring. Funding issues will need to be sorted out.</p> <p>Priority CH8: Intangible cultural heritage. To protect and promote intangible maritime cultural heritage. "A place-names commission to agree how coastal, intertidal and marine place names are recorded on charts would also help to safeguard this aspect of intangible cultural maritime heritage for the future". The Anglicisation of place names erodes what remains of the island language.</p>	No	This will be addressed by priorities CH6 and CH8
JMSP-579439746	Access	Jersey Kayak Adventures	<p>Action RT3: Include better (and cheaper) public transport to many of the beaches, especially if you are to encourage the aim of enabling the enhancement of well-being. Bays such as Bonne Nuit and Bouley Bay need a better bus service to allow people to travel by bus in summer and winter. The increase in the number of toilets and showers (even warm solar-heated showers on the roofs of some toilets) facilities at beaches is a factor in encouraging people to access the marine environment and not feel they need to travel by car.</p> <p>The cleanliness and our beach toilets being open all year are positive factors many visitors comment upon very favourably.</p> <p>Action RT4a: Most coastal car parks do not allow boat trailers attached to the towing vehicles to be parked, so the beach is the only option. Parking a trailer on a slipway is often difficult because the current parking law allows cars to park on slipways.</p> <p>The parking permit at St Brelade to park on the beach could reduce the number of "non-essential users" by having an administration charge and/or perhaps restricting the permits to those with trailers or larger watercraft that needing to be carried on a roof rack. The current permit is a free parking permit, whereas you have to pay to park in the car park.</p> <p>Car parks that are close to beaches should avoid having height restriction</p>	Yes	Extra text added has now been added to section 11.4.2 and an extra action added to RT3 regarding coastal facilities. A further action has been added to RT4 regarding parking on slipways.

			barriers. Many water sports users carry watercraft on the roof racks, and barriers can make entry into car parks impossible.		
JMSP-579439746	Disturbance	Jersey Kayak Adventures	Action RT5a: Good priority. More awareness by some dog walkers about the impact on wildlife and long term disturbance. Include more education when people renew their licences online each year e.g. watching a short video forms part of the renewal process.	No	This will be addressed by action RT5a.
JMSP-579439746	Watersports	Jersey Kayak Adventures	Action RT6b: The foundations for this have already been done by the former Environment Division. Incorporating some of the contents of this GofJ document should make this an easier task to incorporate into the Enjoying the Coast Safely booklet: Jersey Marine and Coastal Wildlife Watching	No	Previous work will be used or consulted where appropriate to undertake the priorities and actions laid out in the JMSP.
JMSP-579439746	Beach management	Jersey Kayak Adventures	11.52 Low water fishing. Not replacing turned stones and chiselling away rocks to extract worms for bait seem to be bigger concerns than are suggested in the MSP. This issue was raised at Société Jersiaise Marine Biology meeting recently. However, perhaps this needs further research to identify if this is happening at a significant level to warrant action.	No	Outside of scope of the JMSP - this falls under recreational fishing management
JMSP-579439746	Management	Jersey Kayak Adventures	RT7a: A permit system operates in many other countries with sensitive areas. Modern technology should permit purchasing via Apps. As in ski resorts and other places, residents should be able to buy lower-priced permits. Purchasing a permit to visit an area could include a brief outline/training of crucial environmental and disturbance issues. The report needs to mention the number of French visitors to the offshore reefs in summer and how the management plan/ASPs etc. is communicated to them. A permit system might also help to fund a warden at peak times. There are many good examples of how wardens can enhance the experience of visiting these unique places, e.g. Skomer and Skokholm islands in the Pembrokeshire National Park. The Commercial operators' crew and skippers should be required to complete Wild Life awareness training such as the WiSe scheme.	No	This falls under action RT7a which recommends increased management of the offshore reefs with the suggestion of a reef warden but the finer detail is outside of the scope of the JMSP.
JMSP-579439746	Renewable energy	Jersey Kayak Adventures	Priority IT4. Good points made.	No	General comment of support.

JMSP-579439746	Water quality	Jersey Kayak Adventures	Priority IT2: Seawater quality monitoring sites. Jersey bathing water is generally of good or excellent quality. Water quality data should be more visible online and at the beaches. The island's good to excellent seawater quality is a significant asset that is overlooked when so many beaches in the UK suffer from sewage discharges.	No	This will be addressed by priority IT2
JMSP-581511842	Seagrass	Jersey Marine Conservation	4.4.4 Develop a Carbon Sequestration Framework Although I accept that the smaller Seagrass meadows may have expanded, can we confirm this is true of the largest substantial meadow namely St Catherines harbour. In that area, substantial areas that should have seagrass cannot be productive due to seagrass mooring. The argument has been put forward that that area did not arise due to natural factors that should not reduce our regard for its importance since the potential for carbon sequestration is very high. New evidence supports the importance of avoiding in sediment disturbance. Suggested Action - Annually measure St catherine's Harbour Seagrass and scrape areas.	No	There is aerial image evidence of expansion of seagrass in St. Catherines over the last two decades.
JMSP-581511842	Research	Jersey Marine Conservation	5.4 Tides The current circulation shown is potentially an oversimplification being 2 dimensional that does not indicate whether there are differences in current speed, water temperature and direction at depths. The tidal range and topography modify dispersal. There are inshore currents that run in the opposite direction. In some places there are gyres and hydrological anomalies. These affect species breeding and distribution with impacts on the commercial crustacean and mollusc industry. Dispersion along the north coast as an example is affected by smaller gyrations e.g. Bouley Bay. The states of tide and speed variation caused by topography all play a part in dispersion, settlement and algae blooms. The creation of a network needs to consider this as a key factor in siting decisions. Action – Detailed tidal and topography study is needed.	No	Outside of scope of JMSP.
JMSP-581511842	Terminology	Jersey Marine Conservation	6.3 Reference is made to Zostra and Kelp forests. There are very few extensive Kelp 'Forests', Rigdon Bank is a Kelp 'Park' and due to the slope gradient most algae on a reef is located on top section in a fairly narrow belt. Suggested Action - A more accurate assessment of the Kelp communities – size and density.	Yes	Kelp terminology has been amended and an extra sentence has been added in section 8.6.3 to highlight the need for additional surveys. This has also been added to Action NB5c.
JMSP-581511842	Terminology	Jersey Marine Conservation	P.70 Deep Sea- the description is misleading as we also have a deep channel running west to east between the north coast and Jersey. As a natural resource that area is important as it is not conducive to mobile gear.	No	Categories are classified on depth contours to give a broad character assessment and so no change has been made.
JMSP-581511842	Admin	Jersey Marine Conservation	P.91. JMC are not given recognition here for our contribution JMC/ Jersey Seasearch undertook a number of surveys, provided data and published reports	Yes	Pg. 91 relates to marine birds but recognition of Jersey Marine

			notably for the Société Jersiaise that identified key species and communities on submerged reef systems notably Sauvage and Rigdon.		Conservations surveys will be highlighted where appropriate. Please see Jersey Marine Conservation reference in Section 8.2.2 paragraph 3.
JMSP-581511842	Seabed Protection	Jersey Marine Conservation	8.2 No Take Zones – Portelet Sub-tidal surveys. I have raised my concern that sub-tidal benthic surveys are very important. They seem to be being played down with inter-tidal studies, BRUVs, grabs and towed cameras being utilised. These methods do not identify diversity and small-scale species. Diving even though it cannot be part of a government operation should be outsourced and integrated within the NB 1 priority. I once again have to ask for a more truthful statement as it is both unfair and inaccurate to attribute the proposal to protect the Sauvage to BMF and to suggest that Rigdon Bank was an anonymous suggestion. Since at least 2015, JMC have promoted Rigdon and published supportive data and reports. The concept of an NTZ has evolved as a mechanism for protection that fits with Jersey legislation but the call for some form of safeguard was initiated and has regularly been reiterated by JMC. The reef surveys were organised by us, following MB & Fisheries requests, principally promoted by Greg Morel. All the subsequent data was published and summary reports were also created. Publishing data that raises the profile of these key sites is an important part of a protection proposal. When asked to help with the BMF dive planning I proposed their 2021 visits as a continuation of our surveys. JMC published species reports for Rigdon in 2020 & 2021.	Yes	The text has been amended in section 8.2.1 to state that a NTZ at Rigdon was proposed by Jersey Marine Conservation. The methods used to monitor marine areas will vary between locations and will not be specified at this stage.
JMSP-581511842	Seabed Protection	Jersey Marine Conservation	8.5.1 Contrary to the implied statement, I would suggest that the Jersey Wildlife Law does not offer the necessary level of protection. Although threatened species are listed, there is no association in this text with necessary habitat protection. Reference to OSPAR and ASCOBANS identifies Jersey as a signatory but does not recognise the absence of applied mechanisms that identify infringements. Human demands take precedence over animal welfare. Our monitoring program identifies regular and repeated disturbance affecting mammal life cycles and family structure. Vulnerable species are listed but frameworks for practical management have not been developed.	No	This will be addressed through priority NB4 and also through action RT6 to promote public awareness of the marine environment.
JMSP-581511842	Seabed Protection	Jersey Marine Conservation	8.5.3 We are using thermal imaging drones to locate seal pups and breeding sites. Also, the equipment is helping us locate and map shallow water seabed areas. Could the licence be with the permission of the RMA Chairman and never during the breeding season. JMC uses the equipment to help us locate and extract fishing debris as that is the safest way to do so. Possible action NB4 A licence must be obtained for drone flying and will only be granted to organisations with a legitimate scientific need to deploy the equipment.	No	Outside of scope of JMSP.

JMSP-581511842	Conservation	Jersey Marine Conservation	P. 90 relates sitings to population. Numerous submitted public reports identify activity but since much repetition is possible these cannot be used to estimate population size. I would suggest 'High numbers of porpoises on p.90 be changed to 'High numbers of porpoise sightings have been submitted'. 	No	Porpoise activity has been recorded through acoustic receivers, not through sightings made by the public, the wording has been updated to make this clear.
JMSP-581511842	Conservation	Jersey Marine Conservation	Sea haul-out sites used in the summer are full-filling a digestive and resting function. They are not necessarily breeding sites. None of our own surveys confirm the population sizes anywhere near the claims being made. The report 'Pinnipeds, people and photo identification: the implications of grey seal movements for effective management of the species' Sayer et al. 2019 provides useful suggestions for research and JMC are following this methodology in an attempt to accurately map distribution and behaviour. The OSPAR report on seal colony management suggests that we are not complying with that directive. The study 'Grey seal abundance patterns in the Channel Islands from 2010 to 2023' By G.Tully in which JMC had been participating, recommends revisions in methodology. More accurate recording also relates to my previous comment on drones. The MSP makes no reference to this ongoing study. NB4 'and all regular seal out sites should be considered..... 	No	The JMSP does not make reference to seal haul out sites as being breeding sites. There is no population size stated for seals in the text. This has been made clearer in the caption of Fig 8b.
JMSP-581511842	Habitat Map	Jersey Marine Conservation	8.6 I find myself struggling to agree with the 8d map. The area in green indicating Kelp distribution is very misleading. Rather than indicating where Kelp can be found, the map suggests actual area coverage and has the potential to be used to calculate carbon storage. This implication then distorts the importance of other seabed types. From our survey data CAFOR scale, the actual coverage is about 10% of that implied by the map from my estimates. I have to accept some of the responsibility for this as the Seasearch reports don't clearly quantify habitat area within a survey site. I know of very few 'kelp forests' in Jersey water. Possibly more study needs to be done to estimate Kelp density. Also, the generalisation on Seagrass is misleading. Zostera m. and Zostera n. function very differently and overlap different littoral zones; 'Management considerations for subtidal Zostera marina beds in Ireland' Dale eta al., 2008. 	Yes	An extra sentence has been added to section 8.6.3 regarding kelp habitats and the need for additional surveys. An extra action has also been added (NB5c) to help address this.
JMSP-581511842	Seagrass	Jersey Marine Conservation	The section on Seagrass beds is misleading. St Catherine's Harbour is substantially larger and functioning as a significant seagrass meadow. JMC funded and supervised the report on the extent of the area. 'Investigating the carbon sequestration potential of seagrass (Zostera spp.) in St. Catherine's Bay, Jersey' Kuo, 2022. 	No	The section identified in the comment is unclear, but the St. Catherines seagrass bed is identified as being an extensive seagrass bed.
JMSP-581511842	Terminology	Jersey Marine Conservation	8.6.3. Rock-Kelp Reference section to Seagrass Forests and the inference that we have numerous extensive dense areas is misleading 'Status and Trends for the World's Kelp Forests' Wernberg et al. 2019. A Kelp Forest should not to be confused with the presence of species Forest Kelp (Laminara hyperborea). 	Yes	Kelp terminology has been amended and an extra sentence has been added in section 8.6.3 to highlight the need for additional surveys. This has also been added to Action NB5c.

JMSP-581511842	Seabed protection	Jersey Marine Conservation	8.6.6 The BC3 areas in fig 8j since they contain high inorganic carbon potentially should be considered as areas requiring some form of protection and there is a link to the Wind Farm proposals isn't there?	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511842	Seabed protection	Jersey Marine Conservation	Figs 8k and 8l Once again the vocabulary is misleading. Yes, Maerl and Seagrass should be protected under OSPAR but the text implies that Seagrass protection is in place. Actually evidence demonstrates that areas of gravel and sand (ie mobile) are depleted of biodiversity through mobile gear disturbance.	Yes	The paragraph in section 8.6.7 has been amended for clarification.
JMSP-581511842	Terminology	Jersey Marine Conservation	8.6.8 Suggestion for revised stronger wording 'As a contracting party to the OSPAR convention the government of Jersey is now prioritising the aims of the'	Yes	Change made to section 8.6.8 as requested.
JMSP-581511842	Blue carbon	Jersey Marine Conservation	Fig 8z Stage 6 & 7 not sure whether we have conclusive evidence of that!	No	Maps were created on best available evidence, please see the evidence base reports on the Government of Jersey Marine Spatial Plan webpage.
JMSP-581511842	Seagrass	Jersey Marine Conservation	Priority NB6 Excellent!! Does JMC deserve a mention here with 3 published reports?	Yes	Jersey Marine Conservation reports have been referenced where appropriate.
JMSP-581511842	Fishing	Jersey Marine Conservation	Fig 9j. Excellent proposals!! Section 9.5 Areas of low crustacean yield are over potted. In some particular areas, Ghost pots and ropes foul active strings. There appears to be no proposed control over potting density which could potentially restore depleted reef based crustacean populations. My impression was that the reduction in Edible Crab and Crawfish was a big concern. Key sites for juveniles are netted and heavily potted. For example, Noirmont, Bouley Harbour, Bonne Nuit Bay and the tidal fringes of the SW Ramsar area.	No	Outside of scope of the JMSP but will be addressed through fisheries management measures.
JMSP-581511842	Wrecks	Jersey Marine Conservation	10.7 & 10.8 The work by JMC and published information to recognise the significance of our wrecks is absent here. The Maritime Officer Roger Hills and Jon Carter from Jersey Heritage, met with us in December, to discuss the situation and our proposals for the future. The MSP information is massively out of date and the map irrelevant. I have already submitted a separate response to this through your feedback portal but include it again here. From our research and numerous visits to the remaining wrecks, there is strong evidence that they provide a window on our heritage, acting as time capsules that reveal the importance of the maritime environment in the shaping of our	Yes	Extra sentences added to sections 10.8.2 (paragraph 1) and 10.8.3 (paragraph 1).

			<p>culture. Also, data gathered by JMC demonstrates that the wreckages are functioning artificial reefs populated by high biodiversity including rare and unique species, providing protection for mobile juvenile communities, and acting as dispersal stepping stones. These factors align with the JMSP vision. If, as I would hope the intention of 10.8 is, to formally recognise what remains, then potentially the second question is; how do we intend to document and monitor these sites while they still exist? Potentially should we be compiling a record that highlights their function within the JMSP?</p> <p>I am not sure whether 10.8 clearly aligns with those objectives. As you astutely observed, preserving the wrecks for those wanting to visit without that turning into total exclusion is challenging and if not handled carefully, could result in legislation that prevents divers from exploring the sites. This is an important consideration. Important questions need to be addressed. Can we maintain access while preventing the further removal of artefacts or destruction cause by activities that are causing structural damage and accelerating decomposition? Could we include the sites as exclusion areas for mobile gear and pot lines? As an example, protective solution, mooring points could be placed secured to blocks a few metres away from the wrecks, maintained and clearly marked. The Schokland wreck diagram used in the JMSP could be clearer and more informative, has a key without explanation, is out of date and is copyrighted by the author. I would be happy to provide an updated free version of my diagram, see above. The known wrecks map (10d) perhaps is misleading, as most sites marked indicate where ships and aircraft sank but as most vessels were fragile structures, very little that corresponds with most symbols visibly remains. The key to the diagram could be enhanced and be revised to better convey sites where visible wreckage remains. (I enclose a suggested alternative). Potentially with some funding help from various sources, JMC could create short videos on each of sights that can be viewed by those interested in the wrecks and their history. (JMC has been surveying and fulfilling Action CH7a and holding discussions related to CH7b and CH7c since 2015).</p>		
JMSP-581511842	Access	Jersey Marine Conservation	Action RT3b Examining this from a Ramsar and personal aspect, this should perhaps show positive and meaningful commitment that the public can identify with: ‘ the government will undertake a program that will improve and enhance beach and recreational opportunities within the St Helier area’. For example where is the recognition of the Ramsar area within the Town boundary or proposals to encourage activities along Greve D’Azette? To improve quality of life we need the development of marine linked educational facilities, that explore and utilise the harbours, inter-tidal pools and adjoining beach area, enhancing	No	This will be addressed by priority RT3 to promote and manage access to the marine environment for the benefit of all

			awareness and the healthy mind and body benefits. Cycle routes should be set up to allow safer access and reduce demands for parking.		
JMSP-581511842	Access	Jersey Marine Conservation	12.2 Action XX 'As this work is essential, improvements to coastal defences should where possible include improved footpaths, cycle lane and possibly parking'.	No	Outside of scope of the JMSP.
JMSP-581511842	Seabed protection	Jersey Marine Conservation	12.3.2 No ground proofing of proposed cable sites looking at the impact on OSPAR defined important habitats.	No	There are no new cables proposed, only a proposed corridor to protect one of the cables from mobile fishing gear.
JMSP-581511842	Admin	Jersey Marine Conservation	End Ref EB/NB/12 data on the Sauvage reef and many other sensitive areas has been published by JMC	Yes	Jersey Marine Conservation now referenced in Section 8.2.2 paragraph 3.
JMSP-567438838	Beach management	Jersey Sea Sports	The impact and remediation of green "Sea Lettuce" should also be taken into account for the Marine Spatial plan, to include possible land based measures to remedy the situation. These would fall into two sectors- 1. preventing the buildup, and 2 removal/clearing of the weed. We can see an immediate beneficial effect if the weed is collected quickly and removed, rather than being left to build up from tide to tide.	No	This will be addressed by current management/policy and will not be addressed through the JMSP.
JMSP-570294023	Admin	Marine management organisation	General comments ▪ It is repeated in Chapters 1-4 that the JMSP is not a statutory document but that it will give direction to other legislative and policy tools, which will be used to deliver the actions set out in the JMSP, therefore those reading this should be clear that the JMSP is not a policy document. However, the JMSP can be downloaded by its three parts (A, B, C) and if someone were to download part C only, they would miss the context behind the plan not being statutory and not being a policy document.	Yes	Each chapter in part 3 now has an additional sentence in a 'Legislation and policy' section explaining that the JMSP is not a statutory document. The timeline has been corrected in Fig.2a, and a paragraph has been added to section 1.5 regarding the Evidence Base and requirements for new evidence.

		<ul style="list-style-type: none"> ▪ Furthermore, implementing the actions may be difficult as the JMSP is reliant on other legislation, regulatory processes, and mechanisms, including contributing to the strategic direction of future iterations of the Island Plan (although no timescales are provided). ▪ Consider embedding links to legislation and other plans throughout. <p>o 1.2 Purposes of the JMSP</p> <ul style="list-style-type: none"> ▪ We welcome the inclusion of details on implementation including Appendix A. Noting that the JMSP is a non-statutory document intended to provide “... an overarching strategic framework setting the approach for a range of tools, including land use planning, marine resource management and fishing regulation...”, we think it would be helpful to clarify how the JMSP will be taken into account when those ‘tools’ are themselves largely statutory. Will the relevant authorities responsible for the tools be bound by the JMSP? Experience in England, elsewhere in the UK, and internationally suggests that the JMSP will struggle to achieve the purposes, vision and aims unless it carries sufficient weight in decision-making. <p>o 1.5 Structure Figure 1c</p> <ul style="list-style-type: none"> ▪ It is noted that the evidence base is intrinsically linked to the process (base layer). It would be useful to see how evidence gaps were identified and if any remaining gaps exist in the JMSP, as this will determine future evidence requirements and influence the strength of policy response/reduce challenge. <p>o 1.6 Guiding principles</p> <ul style="list-style-type: none"> ▪ It is noted that the JMSP will have a clear link from evidence to policy, with English marine plans this has been a vital element. ▪ The JMSP is linked to the Bridging Island Plan (BIP), which provides a good integration of marine and terrestrial. For cumulative impacts, the BIP is laced throughout with references but no separate priority for cumulative/in combination effects. There is no cumulative effects priority/action in the draft JMSP. The aims/objectives of both are clear in that the cultural character and uniqueness of the island will be preserved; however, experience in English MSP is that a cumulative effects policy with an allied co-existence/displacement/co-operation policy suite is required to safeguard from inappropriate/non-sensitive development. <p>o 2.3 History of MSP</p> <ul style="list-style-type: none"> ▪ Fig 2b: The first English marine plan (East Marine Plan) was adopted in 2014, and therefore work had begun prior to 2016. The first draft Statement of Public Participation for consultation for the East Marine Plans was published in 2011, amended in 2012 and then revised in 2013. The figure refers to work commencing in 2016 (the remaining plans are referred to between 2016 and 2021). The Jersey Integrated Seascape and Landscape Character Assessment 		<p>Cumulative impacts are less likely to be an issue for Jersey due to the single jurisdiction and integrated planning between land and sea.</p>
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			could be included on this timeline – it is an award-winning assessment, and it has informed the Seascape section of the JMSP.		
JMSP-570294023	International relations	Marine management organisation	<p>4.2 International legislative and policy context</p> <ul style="list-style-type: none"> ▪ 4.2.2 and 4.2.4 provide a good overview of marine spatial plans surrounding Jersey's waters and cross-boundary agreements relating to the management of Jersey's marine environment. ▪ Whilst there is not a border with the South West Marine Plan, adjacent areas to it include the Bailiwick of Guernsey and French marine plan areas. ▪ It is noted that there is not a stand-alone priority for cross-border cooperation and collaboration. <p>o 4.4 Key related planning documents</p> <ul style="list-style-type: none"> ▪ It is positive to have a section on the BIP and to see reference to it throughout the JMSP – a link could be provided each time it's mentioned for ease. ▪ Key intertidal and marine parts from the BIP are highlighted that have direct relevance to the JMSP. ▪ It's noted that other key relevant documents have their own section also eg Shoreline Management Plan, and Economic Framework for the Marine Environment, further strengthening the JMSP's approach to marine/terrestrial integration 	No	Integration of the JMSP with neighbouring jurisdictions will be considered for future iterations.
JMSP-570294023	Climate	Marine management organisation	<ul style="list-style-type: none"> ▪ 6.3 raises Jersey's potential for 'carbon offsetting'. Does this mean Jersey will introduce compensatory habitats? Is Jersey looking to maintain, protect or restore blue carbon habitats? 	Yes	Blue carbon habitats are considered within the MPA network, and seagrass has it's own priority. Understanding our blue carbon habitats better is addressed by policies SP5 and EN5 in the Carbon Neutral Roadmap, this has been added to the text in section 8.6.6.
JMSP-570294023	Admin	Marine management organisation	<p>7.1 Seascapes</p> <ul style="list-style-type: none"> ▪ This section is detailed and helps to focus on the issues identified in the first priority (retaining and enhancing the existing seascape). ▪ Embed a link to Jersey's Integrated Seascape and Character Assessment as it is specifically referred to within Action SC1a. 	Yes	The suggested links will be live in the final document.
JMSP-570294023	Management	Marine management organisation	<p>8.2 No take zones (NTZ)</p> <ul style="list-style-type: none"> ▪ Action NB1a wording uses 'retained' and 'monitored'. However, there is no mention of management. Will the NTZ be adaptively managed depending on the monitoring? Will the monitoring be reviewed? Are there management plans? For example, if it is found that protected habitats and species move with climate 	No	Outside of scope of the JMSP. This will be addressed by current management and changes will be considered in future in response to environmental change.

			change or other species move in, will the boundaries and protections be adapted?		
JMSP-570294023	Management	Marine management organisation	<ul style="list-style-type: none"> ▪ Action NB3a only states SSI designation will be retained. Will the sites be managed? ▪ Action NB3c incorporates monitoring for all sites. 	No	This will be addressed by SSI regulations.
JMSP-570294023	Management	Marine management organisation	<ul style="list-style-type: none"> o 8.5 Marine mammals and birds, and Areas of Special Protection (ASP) ▪ There is recognition of climate change impacting marine mammals and birds in the plan and the movement through Jersey's waters due to being at the northern and southern edges of ranges. However, the JMSP states it is not within its scope to address these wider changes. Action NB4b is for monitoring and reviewing the effectiveness of ASP designation, however how is adaptation being considered? 	No	ASP management plans are individual to each ASP and focussed on an annual basis but will be guided by long term biodiversity and climate strategies.
JMSP-570294023	Seabed Protection	Marine management organisation	<p>8.6 Marine habitats and MPAs</p> <ul style="list-style-type: none"> ▪ There is recognition of being at the start of Jersey's MPA designations but Actions NB5a, 5b and 5c don't allow for future proofing of sites. Potential to review and monitor the MPA network and addition of adaptability and enhancing resilience moving forward. How will priority NB5 protect MPAs from non-fishing pressures or developments? This will be relevant in the intertidal and coastal areas for ongoing developments. 	Yes	A new action has been added (NB5f) to cover monitoring of MPAs. Protection from non fishing pressures is the focus of Ramsar management and other existing structures but will be considered in future iterations of the MSP.
JMSP-570294023	Fishing restrictions	Marine management organisation	<ul style="list-style-type: none"> o 9.4 Proposed fishing zones ▪ A cumulative impact assessment is required to determine the impacts that the zonation of fishing zones will have on the fishing industry and community. In addition to this, any proposed activities or development in the areas where fishing is allowed will need to undergo a further cumulative impact assessment to avoid or minimise any impacts on the fishing industry and community. Careful management of other activities will be required if this approach is implemented to reduce the impacts on the social and economic aspects of fishing. 	Yes	Business Impact Assessment will be carried out on the final Marine Protected Area boundary and this is referenced in sections 8.6.9 and 9.4.3.
JMSP-570294023	Aquaculture	Marine management organisation	<ul style="list-style-type: none"> o 9.6 Aquaculture ▪ FA3: 'sustainable methods of 'aquaculture' or 'recognised professional standards in sustainability' doesn't appear to be defined. ▪ FA4a and b: it is assumed a review similar to the evidence project to determine the suitability of aquaculture, but it seems a move away from the BIP policy which provides safeguarding for existing sites (unless these priorities are in addition to the BIP policy?). 	Yes	Priority FA3 has been amended to reflect this. FA4a and b relate to phytoculture which is not specifically covered under the Bridging Island Plan (BIP).
JMSP-570294023	Imports	Marine management organisation	<p>9.7 Encouragement and promotion of sustainable fishing</p> <ul style="list-style-type: none"> ▪ Will the sustainability mark just be applicable to vessels fishing in Jersey waters or to those that wish to import fish into Jersey as well? <p>This could have knock-on implications for fishers and markets external to Jersey. There needs to be thought given to how this will be implemented, and standards enforced.</p>	No	Outside of scope of the JMSP - this falls under fisheries management

JMSP-570294023	General	Marine management organisation	Cultural Heritage (Chapter 10) Consider how priorities will be implemented, for example consider including a policy on increasing knowledge, appreciation and understanding of the marine environment and to promote the uniqueness of the island and the impact of lost heritage. (Similar to the MMO's marine plan(s) SOC-1 policy: "Those bringing forward proposals should consider and demonstrate how their development shall enhance public knowledge, understanding, appreciation and enjoyment of the marine environment as part of (the design of) the proposal.")	Yes	A new priority (NB7) has been added regarding a Marine Environment Visitor Centre Priority RT6 also addresses marine awareness.
JMSP-570294023	Management	Marine management organisation	11.2 Types of coastal and offshore recreation ▪ 11.2.4: covers recreational fishing. Does recreational fishing fall under the suggested management measures in chapter 9? This needs to be clear	Yes	Clarity has been improved around commercial and recreational fishing. In Chapter 9, the priorities and actions relating to recreational fishing have been made clear in the text, if recreational fishing is not mentioned then it applies only to commercial fishing.
JMSP-570294023	Disturbance	Marine management organisation	o 11.5 Respecting wildlife and habitats ▪ 11.5.2: Reference to disturbance of wildlife (physically, or through noise). However, it is noted that there is no standalone priority for underwater noise monitoring or minimisation.	Yes	Respecting wildlife and habitats, and underwater noise minimisation and monitoring has been added to action IT3a (formerly IT4a).
JMSP-570294023	Infrastructure	Marine management organisation	▪ There is minimal mention of coastal erosion and flooding. This section appears to address man-made defences rather than nature-based solutions. Nature-based solutions are only mentioned on pg. 41 under the Carbon Neutral Roadmap.	Yes	An extra sentence has been added to section 12.2 to summarise flood risks (from the Shoreline Management Plan (SMP)).
JMSP-570294023	International relations	Marine management organisation	▪ Action IT1b: protection presumably only extends within Jersey's marine area so would suggest encouraging cross-border protection given the significance.	No	Neighbouring jurisdictions have and continue to be consulted during the MSP process but Jersey does not have authority to establish protected areas outside of our territorial waters.
JMSP-570294023	Renewable energy	Marine management organisation	▪ There is no distinction between fixed bottom or floating wind (assume fixed). Also, this section is pending the publication of the Government's wind plan so it's difficult to make any more specific comments.	Yes	A sentence has been added to section 12.5 (formerly 12.6) stating that it is likely that fixed foundation turbines would be required, rather than floating turbines.
JMSP-570294023	Boat passages	Marine management organisation	12.8 Harbours and passages ▪ Fig 12e: the text is very hard to read.		The text size has been increased.

JMSP-570294023	Boat passages	Marine management organisation	<p>12.9 Boat passages</p> <ul style="list-style-type: none"> There is limited mention of smaller or recreational vessels in this section (potentially in another) and not included on the map. Fig 12a is referred to multiple times but is not easily flipped back to (19 pages apart), suggest having separate maps for each sector where particularly relevant for ease of understanding and reading. 		These are included in the recreational chapter (Fig 11b and c). Fig 12a has not been repeated in the interests of saving pages for printing.
JMSP-570294023	Admin	Marine management organisation	<ul style="list-style-type: none"> Appendix A <ul style="list-style-type: none"> We welcome the inclusion of Appendix A. Noting that the JMSP is a non-statutory document intended to provide "... an overarching strategic framework setting the approach for a range of tools, including land use planning, marine resource management and fishing regulation...", we think it would be helpful to clarify how the JMSP will be taken into account when those 'tools' are themselves largely statutory. Will the relevant authorities responsible for the tools be bound by the JMSP? Experience in England, elsewhere in the UK, and internationally suggests that the JMSP will struggle to achieve the purposes, vision and aims unless it carries sufficient weight in decision-making. This could be covered in an opening paragraph in Appendix A. Appendix B <ul style="list-style-type: none"> Appreciate links to documents will be added later, but inclusion on this draft would have been helpful. 	Yes	Additional text has been added to section 1.2 and to topic chapters explaining how priorities and actions will be put into practice when the JMSP is not a statutory document.
JMSP-581511856	MSP	National Trust for Jersey	<p>National Trust for Jersey's vision is to permanently protect Jersey's natural beauty, rich wildlife and historic places for everyone to enjoy and experience. The Trust believes that Jersey, with its dramatic coastline, rich marine environment and extensive maritime history, retains a strong sense of place, identity and above all beauty. However, its rural character, ecology, and heritage remains threatened, possibly more than at any other time. This is due to unsuitable development, unsustainable fishing practices and short-term economic policies in addition to the threat of climate change. As a result, wildlife is in serious decline, the health of our environment is at risk, and sense of place is becoming increasingly elusive. For these reasons, the Trust welcomes the Minister for the Environment's publication of the Jersey Marine Spatial Plan (MSP) consultation. Both the vision and the aims of the MSP align very closely with the Trust's own vision to create "a thriving, marine environment providing environmental, economic, cultural and social benefits" is surely one we can all support and the three aims below are most pertinent to the Trust's ethos:</p> <ul style="list-style-type: none"> Seascapes are valued and their character is retained and enhanced; 	No	General agreement comment

			<ul style="list-style-type: none"> - The natural environment is restored and biodiversity is thriving; - Cultural heritage is understood and protected <p>The trust believes the MPS provides the framework for putting Jersey in a very strong position on a local and international perspective in managing our marine territory.</p> <p>Following the adoption of the MSP, the trust sincerely hope the Minister and States Members seek to move the required regulatory structures and mechanisms as soon as practicable to ensure legal basis for the MSP. It is vital that this step is taken and that all the work done so far is, not effectively wasted. This plan cannot remain a policy document only – it must be given the legal teeth to cement the vision and goals of the plan in law.</p>		
JMSP-581511856	Seascapes	National Trust for Jersey	<p>Seascape</p> <p>The Trust believes that seascape and landscape are critical to the identity of Jersey and have been at the forefront of coastal and marine conservation and protection for many years, including the campaign to protect Plemont and the Coastline Campaign. The coast and marine environment provide the tranquility that is so needed in today's busy society. It is critical that these spaces are protected now and the future and the Bridging Island Plan (BIP) and future iterations ensure that the highest level of protection is afforded to these parts of our island and seas.</p>	No	General comment of support.
JMSP-581511856	Seabed protection	National Trust for Jersey	<p>Natural Environment and Biodiversity</p> <p>With respect to Marine Protected Areas (MPAs) the Trust supports the evidence-based approach that has been taken. Clearly setting out the stages as to how the proposed network of MPAs was assessed was extremely helpful. However, the Trust feels that Jersey must also ensure it fulfils our international obligations, specifically the recent “30 by 30” commitment by the Minister. In addition, the Trust also advocates for the establishment of Highly Protected MPAs (i.e. No Take Zones) in the network.</p> <p>We would emphasize the importance of resisting the pressure to reduce the benefits in exchange for short term economic / political gain. The Trust does acknowledge the impact MPAs can have on existing use but in our view the benefits far outweigh the costs. Our partner, Blue Marine Foundation, together with the New Economics Foundation, has published research into the value of ecosystem services provided by marine habitats, highlighting the economic benefits of habitat protection.</p> <p>Clarification as to whether the MPAs network would enable and support aquaculture development would be helpful.</p>	No	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.

JMSP-581511856	Aquaculture	National Trust for Jersey	<p>Fishing/Aquaculture</p> <p>The Trust is fully aware of the cultural and societal importance of fishing and its history in the Island and is supportive of well regulated, sustainable fishing activity into the future. The Trust would encourage high environmental and welfare standards in all fisheries. We would also encourage Government and industry to aim for sustainable certification for all fisheries. Furthermore, we would support any programmes or opportunities for diversification from higher impact to lower impact fisheries as well as diversification into other maritime opportunities.</p> <p>Globally, as well as locally, wild caught fisheries are under significant pressure and so we would support low trophic aquaculture/ phytoculture of appropriate species and volume (little point in high volume fertiliser, need high end pharmaceutical / nutraceutical) due to terrestrial space. The MSP lacks specific allocation of space for new / innovative aquaculture and this should be considered in the final iteration of the plan.</p> <p>In addition, the Trust would support any measures that reduce the risk of any unintended entrapment or injury to people, or to marine fauna and birds.</p>	No	Outside of scope of JMSP - but priorities FA3 and FA4 recommend that aquaculture and phytoculture be reviewed.
JMSP-581511856	Admin	National Trust for Jersey	<p>The fishing zones proposal would appear to similar in many ways to the MPA network other than zones to protect cables, which would, on the face of it, be logical. However, the use of the terminology “lightly regulated” could sound like a bit of a lack of regulation or a “free for all”. Surely the aspiration for all Territorial Waters should be “well regulated” and not “lightly regulated”? We suggest this could just be the “regulated zone” as the vast majority of fishing legislation and licence conditions apply to these areas and perhaps gives a better signal as to the intentions of Government in this aspect.</p>	Yes	Zone A has been amended to 'Regulated fishing zone' throughout.
JMSP-581511856	Cultural heritage	National Trust for Jersey	<p>Cultural Heritage</p> <p>The Trust fully support the aims to protect and conserve coastal heritage including military and archaeological sites in coastal, intertidal and subtidal locations especially in the light of an absence of appropriate legislation for the protection and conservation of historic wrecks. There have been a number of reports to Government with certain recommendations in respect of underwater cultural heritage. These have been summarised in the MSP report and we would support the development of these recommendations. We would highlight the nature conservation value of wrecks, in additions to the other cultural and societal values, not to mention the war graves designation.</p>	No	General comment of support.

JMSP-581511856	Cultural heritage	National Trust for Jersey	<p>We also have a number of culturally significant navigation marks and the Trust would support some statutory recognition for these structure with an obligation to ensure Ports of Jersey recognise and maintain/conservate such marks under their public service obligations.</p> <p>We would also like to highlight the important in protecting the intangible cultural heritage, as was also recognised in the Heritage Strategy for Jersey published in 2022. We would support these aims fully.</p>	No	General comment of support.
JMSP-581511856	Renewable energy	National Trust for Jersey	<p>Infrastructure, Energy and Transport</p> <p>The Trust understand the need for critical infrastructure but are keen to ensure the right checks and balances are in place when authorities are considering such development. With respect to submarine cables we have no issue provided rigorous environmental assessments in place.</p> <p>The Trust is likely to provide further narrative on its position in respect of the offshore wind through the specific consultation but, in brief, support the principle of renewable energy provision for the island. As above the Trust would expect authorities to ensure the most rigorous environmental and socio-economic assessments were in place for such a significant project. The Trust remains open to the development of other offshore renewable energy technologies but would require further detail before commenting.</p>	No	General comment of support
JMSP-570613861	Compensation	Protect Blue	<p>Having worked closely with the local commercial fishing fleet I think it's vital that we support the transition to a more sustainable fishing industry. Whilst I agree with the proposed plans the new MSP will clearly have direct impacts on the livelihoods of fishers, and as such we need to address those issues and provide solutions for those who will be impacted.</p> <p>If we're able to co-design a solution with the fishers then this MSP would become an incredible case study for other areas in the UK who are facing similar issues.</p>	No	This will primarily be addressed through Marine Economic Framework work and through a Business Impact Assessment that will be carried out on the final proposed MPA boundaries.
JMSP-570613861	Conservation	Protect Blue	<p>I also think that Jersey would benefit from higher levels of ocean literacy integrated into our education system, via comms campaigns & our tourism sector. It would be interesting to understand how ocean literate our community is - as it seems that although most islanders gain much enjoyment from our beaches & ocean activities, there is a general lack of understanding in terms of our influence on the ocean and the oceans influence on us. Our work with Plastic Free Jersey & Climate Conversations showed us a disconnect between ocean health & climate change. I've attached Pamela Buchan's report on Marine Citizenship.</p>	No	A new priority (NB7) has been added regarding a Marine Environment Visitor Centre Priority RT6 also addresses marine awareness.

JMSP-581511851	International relations	Republique Francaise	<p>The French authorities appreciate Jersey's rigorous analysis underlying the delimitation of closure zones where towed fishing gear is prohibited. Nevertheless, they share the following comments, supplemented by the technical analysis provided in the annexes:</p> <p>The French authorities note that the documents on which the scientific arguments are based are not yet available for consultation, which harms the credibility of the document as it stands.</p>	No	While the evidence base documents were not available online during the consultation they were available on request. The documents will also be published alongside the post-consultation version of the JMSP.
JMSP-581511851	International relations	Republique Francaise	<p>The socio-economic impact of the plan has not been quantified. Precise knowledge of this impact is essential if the plan is to be implemented in a way that is sustainable for economic stakeholders. In order to contribute to this exercise effectively, the French authorities have attached the impact on fishing by French vessels which was quantified by IFREMER during the consultation. This study would require further investigation on the basis of the underlying Jersey documents referred to above, which the French authorities are requesting to consult. The French authorities propose that the JMSP should also be the subject of a more comprehensive socio-economic impact study and are therefore at the disposal of the Jersey authorities to participate in the process of reflection in depth prior to implementation. Jersey's central location in the Channel and the scientific knowledge available should enable the various marine uses to coexist without harming ecosystems.</p>	Yes	Business Impact Assessment will be carried out on the final proposed MPA boundaries. This is referenced in sections 8.6.9 and 9.4.3. Wider study and partnership working will take place ahead of implementation of spatial management measures that impact fishing, French representation in this process will be sought. It is the intention of Marine Resources to commission a full Economic Impact Assessment following adoption of the JMSP by the States of Jersey.
JMSP-571427043	Seabed protection	Republique Francaise	<p>The French authorities question the validity of certain closure measures:</p> <ul style="list-style-type: none"> - Regarding the exclusion corridors prohibiting towed gear, due to the presence of undersea cables, the French authorities question their usefulness in view of the burial work carried out precisely to avoid any interaction between these two uses. There is currently frequent fishing activity in these areas. In addition, these closures would have a widespread socio-economic impact because their layout and position make them impossible to bypass during a fishing operation. The French authorities therefore request that these proposed closures be excluded from the management plan and be the subject of in-depth discussions about existing risks. 	Yes	Action IT2b regarding protection of the Guernsey electricity cable has been updated. Energy security is of high importance to the island so the safe management of these connections is of high priority.

JMSP-571427043	Seabed protection	Republique Francaise	<p>- Justification for the closure of Zone C in the south-east of Jersey's EEZ (Les Sauvages reef) is set out on page 86 of the consultation document. It states that Les Sauvages reef has 10 years'-worth of surveys carried out by divers and supports an exceptional range of species (described in EB/NB/11), including rare and slow-growing species such as sea fans and corals; as well as submerged prehistoric archaeological sites. Jersey deems this exceptional site to be threatened by static gear, as traps and lines snag seabed flora and fauna, and would like it to be fully protected (NTZ) without waiting for further analysis of the benefits of the existing Portelet NTZ. France was unable to consult document EB/NB/11 (entitled "A baseline description of the benthic assemblages of Les Sauvages reef", Jersey Blue Marine Foundation, 2023). France requests that the benefits of such a closure in an area important for static fishing gear be demonstrated by a scientific consensus prior to possible measures. Furthermore, rare species have developed when static gear fishing has continued, which shows that this type of fishing is compatible with these rare species.</p>	No	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. There is published research from studies in Lyme bay that show <i>E. verrucosa</i> to be found in greater abundance where potting levels are lowest. While <i>E. verrucosa</i> is found elsewhere, Les Sauvages is a hot spot.
JMSP-581511851	Renewable energy	Republique Francaise	<p>In addition, the envisaged wind farm in the south-west of Jersey waters is a laudable initiative in the context of the common goal to achieve carbon neutrality by 2050. However, in order not to make the impact of these measures on fishing activities even more severe, the wind-farm section of the current plan should be detailed. In this way, the overall impact of the JMSP can be quantified and anticipated, which will help to alleviate the feeling of successive reductions in fishing rights in Jersey waters. In particular, it will need to be specified whether fishing will be permitted within the wind farm, and under what terms. The French authorities are also proposing that bilateral discussions be set up to examine the various connection options for the wind farm envisaged in Jersey waters. These discussions will make it possible to co-construct a coherent connection network and identify possible landing points on the French coastline. The latter will have to take account of the capacity of the electricity grid in Western France, which may require studies and investment for which the Direction Générale de l'Energie et du Climat (DGEC) and RTE, the French electricity grid operator, will be your contacts. Furthermore, the DGEC is contributing on France's behalf to the specific consultation set up on the issue. Given the proximity to the Saint-Brieuc wind farm of the areas envisaged at this stage, it will also be beneficial if in-depth discussions on the siting of offshore wind farms in Jersey waters and French waters focus on the details of their geographical location. These constructive discussions will have to help ensure maritime safety in the area, prevent any masking effects and maximize</p>	No	Outside of scope of the JMSP - the JMSP does not go into the detail of a windfarm as Jersey is only in the early stages of investigating a windfarm following the approval of the proposal to the States (P82-2023). Local stakeholder and neighbouring jurisdictions will be consulted during key stages of this project. Please also note that the priority wording for the windfarm (IT3) has changed to "An appropriate and rigorous assessment and consenting process for offshore renewable energy developments should be introduced." Neighbouring jurisdictions will continue to be engaged in future.

			<p>production capacity.</p> <p>Finally, with a view to developing joint use of offshore wind farms, the French authorities are also willing to exchange knowledge to help develop best practice.</p>		
JMSP-581511851	Navigation	Republique Francaise	<p>The French authorities also welcome the close attention paid to maritime safety issues and the maintenance of shipping lanes to St Helier. We share the same concern for a coherent distribution of maritime space between the envisaged wind farm and the shipping lanes, particularly for ferries departing from Saint-Malo.</p>	Yes	Priority IT7 now specifically refers to neighbouring jurisdictions.
JMSP-581511851	Aquaculture	Republique Francaise	<p>In this respect, sharing feedback would be beneficial for the seaweed-farming project envisaged by Jersey, as well as for any possible coexistence with fishing activities.</p> <p>In a constructive spirit of good neighbourliness, the French authorities are therefore at Jersey's disposal to organize working meetings that will enable sustainable and harmonious development in the Bay of Granville.</p>	No	Outside of scope of the JMSP but future developments with respects to spatial management in the Bay of Granville area will be carried out in consultation with Normandy, Brittany and central French Government.

JMSP-580780525	Management	Seafaris	<p>Action RT7a:</p> <p>We strongly agree that a management plan for the offshore reefs should be introduced.</p> <p>It is imperative that enough users are consulted during the production of the offshore reef management plans. We have concerns that heavy involvement from certain associations could result in biased plans which are not representative of all stakeholders.</p> <p>We would propose that 'users', includes, but is not limited to, commercial operators (both fisherman and rib operators), wildlife experts and local boat owners associations. Organising meetings and forums for open discussions with these stakeholders can provide valuable insights and help develop a management plan that truly reflects the collective vision of our community.</p> <p>The introduction of a permit system does not specify whether this is for vessels or persons and whether it applies to recreational access, commercial access or both. It also presents legal challenges as it would restrict access to a large public area.</p> <p>Any proposal for a permit system should carefully consider the economic implications for businesses, particularly those reliant on the popularity of the Ecrehous as a tourist destination.</p> <p>We agree that a reef warden would be beneficial but we express reservations about securing funding and ensuring the position's long-term sustainability.</p>	No	This will be addressed by RT7 - further detail is not possible within the scope of the JMSP.
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JMSP-580788274	Designations	Seafaris	<p>We recommend there should be an additional action point for consultation into the effects further ASP's at the Ecrehous would have on commercial operators. Restricting access to particular areas could cause a significant loss in revenue for fishermen. Most tour operators are WiSe accredited and stick to set routes which mitigate disturbance to seals. Consideration should be given as to whether all commercial operators must attend an appropriate WiSe Scheme course.</p>	Yes	<p>This will be addressed by priority NB4 but consideration to current users, residents and operators had been highlighted in section 8.5.5 and in action NB4a. The rest will be addressed by RT7a - if a permit system is brought in there would be conditions relating to wildlife disturbance.</p>
JMSP-580788274	Seabed protection	Seafaris	<p>We strongly agree that Action NB5a is included in the final plan. Mobile gear has a significant detrimental effect on marine ecosystems through habitat destruction. Shallow sea areas, especially around our offshore reefs, are key habitats for maerl and seagrass beds. These habitats need the highest protection as they are the very building block of marine ecosystems. It is difficult for our organisation to showcase our offshore reefs as heavily protected when we have mobile gear being used in such close proximity.</p>	Yes	<p>The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.</p>
JMSP-580788274	Seagrass	Seafaris	<p>Action NB6a:</p> <p>We agree that Seagrass Habitat Management Areas need to be established. Management should consider focusing on the removal of disused moorings whilst simultaneously raising awareness of seagrass friendly moorings.</p> <p>Action NB6b:</p> <p>We believe that seagrass friendly moorings should be recommended and subsidised but should not be a requirement. Making them a requirement would be too much of a financial burden for the majority of boat users. It would also likely lead to the deterioration of the relationship with boat owners and those who take on responsibility of the management of the seagrass areas.</p>	Yes	<p>Action NB6b has been amended to "...such moorings should be incentivised within the Seagrass Habitat Management Areas."</p>

JMSP-581511864	Conservation	Societe Jersiaise marine biology section	<p>Comments on the Marine Spatial Plan</p> <p>The Integrated Coastal Zone Management Strategy 2008, itself was long overdue, and was often flagged as addressing concerns about the lack of research and conservation around the coast of Jersey, the MSP appears to be just repeating some of the proposals from 2008, it would therefore appear there is still little will to address some areas of conservation by the authorities. It is disappointing that some comments and concerns raised within the consultation do not appear to have been properly addressed. Also, that the section proposal for a “No Take Zone” was dismissed only due to the lack of fishery activity in the area, and we think this is a missed opportunity to improve the management of our marine flora and fauna.</p>	No	No Take Zones are one of the strictest forms of marine management and the recommendations were therefore considered very seriously. It was decided that only Les Sauvages was biodiverse and sensitive enough to warrant this level of proposed protection ahead of any results from Portelet No Take Zone.
JMSP-581511864	Climate	Societe Jersiaise marine biology section	4.4.4 It does not appear the government is that serious about emissions from aviation or maritime transport with zero duty on marine fuel, and aviation fuel duty and gst free. More encouragement and incentive should be in place for the use of sail power.	No	Outside of scope of the JMSP - this falls under the remit of the Carbon Neutral Roadmap
JMSP-581511864	Conservation	Societe Jersiaise marine biology section	<p>8.3.3</p> <p>Ramsar sites; some years ago, the section worked with the kite surfing association to minimise bird disturbance, and set up a voluntary code and designated area, sadly this is no longer adhered to, maybe this should be revisited and put in place in a more regulatory manner, if a voluntary approach cannot be adhered to. Management plans have already been produced in 2011, and 2012. It is disappointing to say the Ramsar designation gives the public a false impression that the areas are meaningfully protected, when this is far from it, and the habitat and several species have suffered as such.</p>	No	This will be addressed by priorities NB4 (Areas of Special Protection), RT6 (Seaside Code), and RT7 (Management of offshore reefs).
JMSP-581511864	Conservation	Societe Jersiaise marine biology section	<p>8.5.3.</p> <p>It was disappointing to see when the ASP on Marmotier, Les Ecrehous came into being, the area was smaller than had been in the previous year, and public access to the area increased, and the Roseate tern failed to nest there as it had previously done, and observations appear to show very few, if any Common terns fledged in 2023. It has been suggested that under OSPAR we are obliged to have an action plan for the rare Roseate tern, a freedom of information request failed to get an adequate response to this, we would suggest that a plan be made public. We suggest improved monitoring include cameras on the nesting sites and birds, current cameras are focused on the surrounding area, not the nesting site or the birds themselves.</p> <p>No mention is made that the common tern has abandoned the coast of Jersey as a nesting site, including within the Ramsar site. Perhaps it is worth looking into if it would be viable to help them re-establish.</p>	No	This will be addressed by NB4 and RT7 and section 11.6.3. Specific details about how these priorities will be actioned is outside of scope of the JMSP.

			The use of drones in sensitive areas is causing disturbance to a variety of bird life, this is not being addressed. The same could be said for the now common use of loud fireworks which disturb wildlife for several miles.		
JMSP-581511864	Conservation	Societe Jersiaise marine biology section	8.5.5 Regarding seal haul out sites, the main disturbance issues are caused by commercial rib operators, and the seals have mostly been displaced from their traditional haul out sites, and moved to areas outside of them, and in one area the commercial operators have realised this and pursued the seals there. It should not be that difficult to make a licenced and supposedly wildlife trained operator accountable for these actions. It is disappointing to see the no one has been prosecuted under the wildlife law even though there have been numerous concerns raised over the years about operators and the public disturbing marine life. Drones are now common place at the Ecrehous, with the guidelines advocating use outside of the nesting season.	No	This will be addressed by RT7 and RT6.
JMSP-581511864	Seabed protection	Societe Jersiaise marine biology section	8.6.8 Although in theory the section is in favour of MPA's, we do have some reservations about the lack of meaningful management, protection, and the continuing of extraction of commercial species from the existing areas, and suggest conservation measures be improved and reviewed before any extension takes place. For example, the damaging activity of turning of stones by low water fishers often in important and sensitive habitats is causing serious damage, and although it has been raised by many in the consultation, the action is to continue with an educational approach, that is not working now, it certainly is unlikely to work in the future. Another issue is the use of monofilament nets which are locally known to entrap birds, seals, and fish which are discarded, we would suggest the use of monofilament nets within Protected areas be banned. There may also be some benefit of extending shore MPA's to the territorial limits, thus creating corridors for species to move and reach spawning areas unhindered.	Yes	The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community. Netting is recommended to be reviewed under action FA2a. A need to monitor migratory fish species has been highlighted in action NB5. And a beach warden scheme has been recommended (RT6a) to promote enforcement of new Seaside Code.
JMSP-581511864	Seagrass	Societe Jersiaise marine biology section	8.7.3 Seagrass beds – At the Ecrehous the small areas there have had some of the wireweed cleared around its borders during the spring, this has resulted in a small growth in size of the seagrass bed area. It may be worth looking into this as part of a management of some of the smaller areas around Jersey. (To decide as a group)	No	The seagrass area at the Ecrehous is small and not located near main human activity areas or anchorage areas and so has not been included in the seagrass management area in this iteration of the MSP. It will be considered for future iterations should the extent and human use of this seagrass bed change.

JMSP-581511864	Restoration	Societe Jersiaise marine biology section	9.2.2 We suggest looking into establishing native oyster beds in the areas where they were previously very productive, by the spreading of seed oysters, such schemes are being carried out in the UK and USA.	No	Outside of scope of the JMSP
JMSP-581511864	Seabed protection	Societe Jersiaise marine biology section	9.4.3 It is disappointing to see only one small NTZ proposed, we would suggest some areas are trialled to assist in fishery management, which is generally failing. Most NTZ's have significant fishery activity around them, due to their ability to hold and allow stocks to reproduce, Lundy is a good example, and Portelet is now well bordered and encroached by pots.	Yes	There were a number of comments relating to No Take Zones, both positive and negative. There were several comments asking for more NTZs but the evidence base remains the same and the previous recommendation of retaining the Portelet NTZ and including a new NTZ around Les Sauvages have not changed. The MPA boundaries have been adjusted to reflect a suitable balance between the general support for the MPA concept and reasonable concerns expressed primarily by the fishing community.
JMSP-581511864	Aquaculture	Societe Jersiaise marine biology section	9.6.2 Over the years there has been several issues of discarded and redundant oyster trestles, and when these are reported action often takes several months at least, we would ask that these issues are addressed quicker in future. Trestles are altering the ecology; we suggest these issues are monitored and that efforts to look at means of minimising the resulting damage are undertaken.	No	This will be addressed by current regulation/policy and will not be addressed by the JMSP.
JMSP-581511864	Cultural Heritage	Societe Jersiaise marine biology section	10.6.3 The section routinely discover areas of interest whilst undertaking shore surveys, and have a wealth of knowledge on vrac tracks, marks, clay and peat deposits, and quarrying evidence, and would be pleased to assist with any survey that would take place.	No	General comment of support and offer of help gratefully noted.

JMSP-581511864	Cultural Heritage	Societe Jersiaise marine biology section	<p>10.7.3</p> <p>We would suggest where possible efforts are made to make navigation marks as wildlife friendly as possible, and when restoration works are carried out this is taken into consideration, There are environmentally friendly options to Buoy moorings in the form of synthetic alternatives to chain, we suggest this is investigated and trials take place.</p>	No	Many navigational markers either don't have chain or are too heavy to be on an eco-friendly mooring. In these instances safety has to be prioritised.
JMSP-581511864	Education	Societe Jersiaise marine biology section	<p>12.11.3</p> <p>We suggested some form of maritime hub be created as part of the Coastal Strategy 2008, there was the creation at great cost of "Discovery Pier" at Gorey. Perhaps La Crete at Anne Port has the potential to be a small centre with wet facilities which could tie in with a NTZ in front of it, Archirondel tower with Heritage permission could be a base for visiting students and researchers.</p>	No	This will be addressed by priority NB7 regarding a visitor centre.
JMSP-581511864	Enforcement	Societe Jersiaise marine biology section	<p>General</p> <p>A proposal to make an Honorary Environmental Officer within the Parish system to undertake protection, and education matters environmentally, was rejected by the Chefs de Police committee, stating they already undertook such a role. We suggest this is investigated further and implemented in some way; time past produce inspectors doubled as fishery inspectors. We must be one of the few places with a National Park that has no wardens.</p>	Yes	References to beach wardens have been added to section 11.5.3 paragraph 1 and to action RT6a.
JMSP-581511864	Infrastructure	Societe Jersiaise marine biology section	<p>We suggested some form of maritime hub be created as part of the Coastal Strategy 2008, there was the creation at great cost of "Discovery Pier" at Gorey. Perhaps La Crete at Anne Port has the potential to be a small centre with wet facilities which could tie in with a NTZ in front of it, Archirondel tower with Heritage permission could be a base for visiting students and researchers.</p>	No	General comment of support.
JMSP-581511867	Disturbance	Societe Jersiaise Ornithological Section	<p>Submission from the Société Jersiaise Ornithology Section regarding the Jersey Marine Spatial Plan.</p> <p>Below is a listed of ideas we would like to see included in the marine spatial plan, as a way to increase protections for our coastal birds and also to help minimise the high levels of disturbance that they currently have to endure.</p> <p>- Full protection of certain areas of coastline, for example an area of special protection at Petit Port during and either side of high tides to protect the</p>	Yes	Most points are already addressed by priorities NB4 and RT5 and action RT6b. Action RT6a has been expanded to include - 'not disturbing sensitive wildlife'.

			<p>historical wader roost there. Other areas should be considered, like the wader roost at La Tour Carre in St Ouens Bay.</p> <ul style="list-style-type: none"> - Regular monitoring of the ASPs to not only ensure there is no disturbance being carried out but also to monitor the breeding or wintering numbers birds. - Exclusion zones in certain areas of the coastline at certain times. For example, no water activities between Le Hocq and Seymour slip during high tide to prevent the roosting waders from being flushed off the rocks by kayakers and paddleboarders. Alternatively, an exclusion zone around certain rocks that are used, example, the two large rocks off La Rocque could have a 100-meter exclusion zone around them during high tides. - Dog bans on certain areas of coastline during differing states of the tide and a full year-round dog on lead in Grouville bay, especially the southern part extending from Le Hurel south to La Rocque. Also including dog walking into the exclusion zones at the same times as other activities. This is one of the biggest causes of disturbance on our beaches, and would also need enforcing. - Full protection for Brent Geese from any kind of h, this should already happen under the Wildlife law 2021 anyway. We would like to see people being actively encouraged to keep away and give them space as well as protection their eel grass feeding areas. - Complete ban on all types of water sports in Grouville Bay, especially during winter months and also much stricter controls in regard to motorised craft (i.e., jet skis) from riding through the middle of resting Brent Geese and other seabird flocks. - RIB operators should be properly licensed, I believe they are currently by the harbour office, but they should also be by Environment dept, and a limit to how many can land at the same time on our offshore reefs. Reef wardens would also be a good idea during breeding season. - As we know, enforcement is key, the possibility to introduce official wildlife wardens? something like the honorary police but with a role specific to policing wildlife laws. An unpaid voluntary position with limited statutory powers, perhaps under the authority of the Connetable. 		
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JMSP-579829159	MSP	St. Catherines Sailing Club	<p>Firstly I'd like to state that we welcome your plans to safeguard the marine environment, and stand by you in your aims for conservation of our environment and heritage.</p>	No	General comment of support.
JMSP-579829159	Watersports	St. Catherines Sailing Club	<p>Our number one concern is a loss of access to the sea for sailing in St Catherine's bay, We are highly weather and tide dependant and would stringently resist any attempts to curtail our unimpeded access to launch, ie to the slipway at St Catherines Bay. We recognise and welcome the recent influx of users to the bay, chiefly the blooming rib charter businesses and the growing popularity of sea swimming. We are concerned that the slipway is at capacity use, and would welcome steps to limit parking on the slipway at peak times.</p> <p>We are the island's only dinghy sailing club, and a registered charity, the entire Island Games sailing team is drawn from our ranks, we are an outstanding RYA training center. In other words a well run, well governed, grass-roots sports club in our 76th year or operation. We adhere strictly to governing body safety regulations and teach around 300 youngsters a year to sail. We are family centered and performance oriented.</p> <p>I am concerned that one of your stated aims is to encourage participation in sports and yet the plan contains no plans to bolster participation at clubs such as ours and has been prepared without consultation with organisations who are using the sea for sport or recreation, a case in point is that the slipway remains unusable for half the tidal cycle, having been put out of action by years of poor maintenance.</p> <p>We welcome your stipulation that bylaws maintaining the 5 knot speed limit inside the yellow bouys will be upheld, and would like assurance that they will be placed no closer inland than currently positioned. Roughly inline with the 'Three Arches' and Archirondel tower.</p> <p>We are an expanding club and have plans to remodel our clubhouse to better meet the needs of our members and our training program we would be concerned if underdue planning restrictions were placed on us as a result of regulation.</p> <p>In short whilst we welcome the aims of the report, the lack of details and the lack of engagement with established users means we cannot give it unqualified support.</p>	Yes	<p>Sentence added to end of section 11.4.2 paragraph 5 regarding the condition of slipways and their importance to watersports. A new action (RT5e) has also been added to highlight the need to assess the condition of slipways and repair as necessary, prioritising St Catherine's Bay.</p>

Appendix B: Submitted reports

The following pages are reports submitted from organisations that include graphs and references to support their comments.

Marine spatial plan submission-Jersey Fishermen's Association (JFA)

January 2024

In order to provide clarity and detail, this document is designed specifically to accompany the nav chart submitted as response to the first draft of MSP by the JFA, on behalf of the mobile gear sector. It is intended that fishing track plotter data from a small number of boats will also accompany the chart and is to be considered as supporting evidence in the context of “comparative best usage” of specified areas and continued access to both traditional and current fishing areas.

The principle of comparative best usage of the areas to which the fleet requires continued access is fundamental to this submission. The JFA hold that, along with the notion of comparative best usage, our established marine economy, along with the potential for future growth, is an element which must feature with equal significance in the process of delivering a marine spatial plan, as any other criteria. By way of example, with reference to comparative best usage, we note that within the same timeframe as the production of a marine spatial plan, Jersey's environment minister has issued a public statement and a consultation exercise based on plans to develop a large wind-farm in Jersey's sea area to the SW of Corbiere. Hence the use of the comparative best usage principle, as the proposed windfarm is located in an area known to be important for a number of important fish and shellfish species including Bluefin Tuna. Clearly the minister considers that the impact and extreme disturbance of the seabed in that area for the purpose of a windfarm, to be acceptable and the concept of a wind-farm to be of greater importance than protection of habitat and the health of the many important fish species that rely on the area.

The chart; For clarity, we refer to specific areas or zones for continued access on the chart, by the numbers as illustrated on the chart.

Straight Lines; It should be noted that in the interests of all concerned and for obvious reasons, the JFA proposed chart uses straight lines to define the perimeters of the Marine protected area and access zones, (as opposed to the series of arcs used on the chart proposed by the Environment/MSP team). Additionally, wherever possible these lines run parallel to lat long lines and in a number of instances the lines are set to correspond with round numbers of latitude or longitude. e.g. ref point 11 sits at 49°08.50' x 02°15.50'. Other lines use well known landmarks or seabed features as reference points.

Seasonal Access; To be noted also that the the JFA chart specifies some areas under the principle of “temporal or seasonal access”. It is the view of the JFA, that protection of breeding, spawning or nesting areas for important fish species is of equal validity as protection of any other sensitive habitat. The value of such seasonal access areas and the need for closure to mobile gear is best defined around the known seasonality of the species concerned. This represents a more pragmatic approach than total closure.

Within the first draft of MSP is a proposed exclusion zone around GJ1 and GJ2 cables. The JFA very strongly rejects the proposal or indeed any notion of restricted access to traditional fishing grounds, given that all the dialogue surrounding the route of the cables through productive fishing grounds and the need to ensure continued access for fishing, had already taken place prior to the laying of the cables. Much of the dialogue will be minuted in the Marine Resources Panel meetings of that era (1980s?)

The Zones. In numerical order along with numbered reference points as follows;

Zone 1; is the area extending from the existing limits within St Aubins bay extending out to Ref point No 10 due south of Noirmont point in the Southwest, to ref point 9 in the SE (to the SE of Demi des Pas pas light). This zone represents an important and productive area which has been fished, mainly for scallops for decades. It is the case that the area constitutes an important lifeline to those local boats, practically all of which are under ten meters, during periods of poor weather. No seasonality has been attached to the zone, however neither has it been ruled out.

Zone 2; working around the island clockwise to the south and west the JFA chart proposes an enlarged area for protection from Noirmont to Corbiere using ref points ten and eleven encompassing the known kelp reefs/beds SW of Noirmont, along with the banc known as the Jumenté banc. This then leads to Zone 2 which is effectively the Corbiere banc, otherwise known as the Great Banc. This is to be a seasonal access area closed during the summer months and open during the winter months on roughly 6 monthly cycles. It is an area which has been fished using mainly trawl gear for decades and is crucial to the existence of a local sector targeting finfish targeting skates, rays & finfish, the banc being a very productive area for those species.. The eastern limit line of zone 2 runs due North-South, while the Northern limit is set on a NW-SE line running from Rocco Tower to West Rock.

Zone 3(a&b); heading North from zone 2 is an enlarged protected area for kelp focused around St Ouens Bay and the Rigdon banc. This then leads to access zones 3a and 3b set around the paternosters reef. 3A is a seasonal access area to the SW of the Paternosters reef and is an important area traditionally accessed by our local fleet using the demersal trawl métier. As with the Corbiere banc it is an essential zone for the finfish sector with skates rays and flatfish the target species. 3b is to the NE of Paternosters and is a productive and important area for the scallop sector. No particular case has been made for seasonality, however it has not been ruled out either. The timeframe for any seasonality on 3b would almost certainly align with the nearby zone 5, but not align with zone 4

Zone 4; is another seasonal access zone which focuses specifically on the banc known as the Plemont Deep banc where there is a long history of trawling for skates and rays. Western limit is defined by a N-S longitude line running from ref points fourteen to fifteen. While it is a relatively small area it is nevertheless extremely important, particularly given that our local fleet currently only has exclusive access to a small number of areas for finfish within Jersey's 3nm. Traditional areas beyond the 3nm where the much more powerful french fleet have access, do not and cannot sustain a small scale fleet such as ours due to the almost constant effort and activity of powerful french trawlers . As with the Corbiere banc seasonality is anticipated, based on a summer closure, with winter months opening.

Zone 5; links to zone 4 geographically ,but represents an important area for our scallop fishery rather than the finfish sector. The location on the North coast provides for semi sheltered access during periods of poor weather from the south. It is important to note that while seasonality is proposed for this zone, being a scallop production area, it will differ from zone 4 where seasonality is centered around finfish .

Zone 6; from zone 5 there is then another fully protected area of North coast with its western edge on a N-S longitude line on ref points 16 & 17, to run north either from La Crete point or to use longitude 02.06.50. This protected area continues eastward to St Catherines breakwater where a line is proposed running NE to Maitre isle. This leads to the larger access zone 6, where there is an extremely important scallop fishery. This is a zone which again enables fishing in relatively sheltered conditions during

heavy weather from the prevailing westerly conditions. Fishing for scallops in this zone and in earlier times, for oysters has been going on for centuries. The area represents the most productive area for our mobile gear fleet to which access is absolutely critical. The JFA hold that the combined production of zones 1, 3b, 5 & 6 (all within our 3nm limit) represents around 80% of the entire scallop production of the Jersey fleet, with Zone 6 being by far the most important .

Exclusion from this area would beyond doubt have catastrophic implications for the island's fishing and broader marine economy, including the merchant and export sector. It would likely also have negative implications for the hospitality sector. Zone 6 covers an area which to the South is defined mainly by existing lines surrounding the protected area of the Violette banc, Anquettes area.

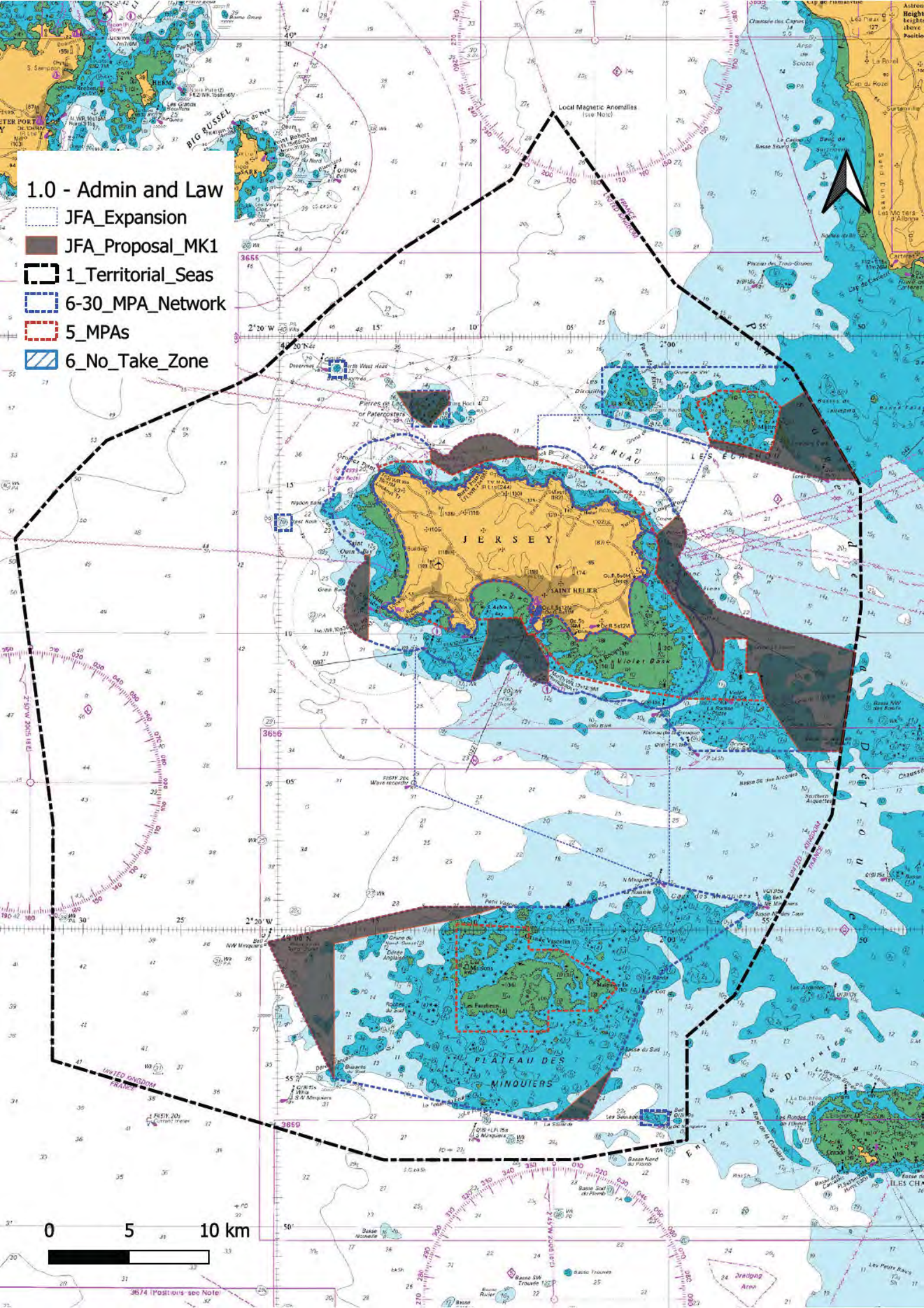
Zones 7. From zone 6 there is an exclusion zone, which is to a large extent, already defined and closed for protection of mearl. There is a small amendment proposed to the MPA Southern limit line after which there is a seasonal access area, zone 7, focused specifically on the well known Frouquier Box bream nesting grounds.

Zone 8; is part of the area to the west of Les Minquiers where access is required for the scallop sector but where there is a small Bream nesting area on the Northern edge. Our scallop fishery in the broader NW Minquiers area has existed for decades. Seasonality for the bream nesting grounds which forms part of zone 8 will coincide with the known breeding season while seasonality to the wider area has neither been proposed nor ruled out.

Zone 9 is to the South east of Minquiers and is specifically proposed as an important area for scallop production.

The JFA considers that the proposed chart, along with the qualifying points for each zone as above, represents a reasoned and measured response to the first draft MSP.

The numerous other issues, most of which have been raised already by individuals concerned with the broader marine economy, such as the negative effects of displacement and increased carbon footprint resulting from having to import our seafood in the case of loss of our fishing fleet, all remain valid but need not be included as part of this submission.



1.0 - Admin and Law

- JFA_Expansion
- JFA_Proposal_MK1
- 1_Territorial_Seas
- 6-30_MPA_Network
- 5_MPs
- 6_No_Take_Zone

0 5 10 km

3674 (Positions see Note)

**NOTE VERBALE
TO THE GOVERNMENT OF JERSEY**

**Response by the French authorities to the
Jersey Marine Spatial Plan consultation draft.**

The marine planning process begun by the Government of Jersey is a positive initiative towards the integrated, sustainable management of maritime issues in the Bay of Granville. The services of the French authorities, which are pleased to provide their contribution to the discussions in a spirit of good neighbourliness, closely consulted the Jersey Marine Spatial Plan (JMSP) with interest.

The JMSP is especially welcome in that it echoes the French planning initiative, which is currently entering its second phase following an initial exercise begun in 2017. At the same time as the adoption of a second National Strategy for the Sea and Coast (SNML) for the period 2023-2029, the strategic seaboard documents (DSFs) are in fact being revised for metropolitan France's four seabords.

In France, the DSFs are designed to adapt at local level the national ambitions expressed in the SNML and are being publicly debated under the aegis of the *Commission nationale du débat publique* (CNDP) until April 2024. This extensive consultation will focus on three main objectives: identifying interactions between uses and preventing potential conflicts, identifying areas of strong protection with a concern for environmental preservation, and mapping priority areas for installing and connecting offshore wind turbines, over a 10-year period and by 2050.

Just as the French authorities are pleased to contribute to the JMSP consultation phase coming to an end, they invite Jersey to take part in the debates currently taking place on our seabords. Contributions by your government and your fellow citizens will be carefully considered at events likely to be of interest to Jersey's government and citizens concerning the East Channel-North Sea (MEMN) and North Atlantic-West Channel (NAMO) maritime areas, and on the dedicated website (<https://www.debatpublic.fr/la-mer-en-debat>).

The French authorities are pleased to note that planning initiatives in France and Jersey are based on the principles of UNESCO's International Oceanographic Commission. France's and Jersey's marine spatial plans share an integrated, balanced approach to ecological, economic and social issues, backed up by scientific evidence and democratically approved. This common methodology provides a valuable basis for discussion for a sustainable, integrated, concerted management of resources in the Bay of Granville. It will undoubtedly facilitate future discussions on the points of attention that will have to be addressed jointly to ensure a smooth coexistence of uses. The French authorities would like such discussions to continue and a process to be confirmed between the European Union and the United Kingdom for dealing with the spatial protection of oceans in a formal discussion forum between the parties. The regional dialogue in place between France, the European Commission, DEFRA and Jersey is proving to be an appropriate structure concerning the Bay of Granville waters.

The French authorities reiterate their desire to work towards a long-term management of fisheries resources that guarantees the sustainability of fishing activities in European waters. The protection of marine species and habitats is a strong goal shared by the French authorities on which work is under way on all seabords. At both national and European level, every measure taken is justified scientifically and consulted on with all local stakeholders, including fisheries professionals. This approach makes it possible to achieve the protection targets aimed at, while taking account of all human activities present within the protected site. In this respect, the complexity of the planning exercise for marine uses means that socio-economic issues linked to all activities on a coastal scale should be taken into account.

It should be recalled that, pursuant to the Trade and Cooperation Agreement (TCA), and particularly articles 494 and 496, the Parties shall cooperate with a view to ensuring the sustainable conservation and exploitation of stocks. Decisions on the issue shall be made on the basis “of the best available scientific advice, principally that provided by the ICES” (Article 494). Moreover, any measure taken by one party which is likely to affect the vessels of the other party must be duly notified to that party. Compliance with these provisions is essential for maintaining fisheries cooperation between the European Union and UK.

The French authorities appreciate Jersey's rigorous analysis underlying the delimitation of **closure zones** where towed fishing gear is prohibited. Nevertheless, they share the following comments, supplemented by the technical analysis provided in the annexes:

1. The French authorities note that the documents on which the scientific arguments are based are not yet available for consultation, which harms the credibility of the document as it stands.
2. The socio-economic impact of the plan has not been quantified. Precise knowledge of this impact is essential if the plan is to be implemented in a way that is sustainable for economic stakeholders. In order to contribute to this exercise effectively, **the French authorities have attached the impact on fishing by French vessels which was quantified by IFREMER during the consultation. This study would require further investigation** on the basis of the underlying Jersey documents referred to above, which the French authorities are requesting to consult. The French authorities propose that the JMSP should also be the subject of a more comprehensive socio-economic impact study and are therefore at the disposal of the Jersey authorities to participate in the process of reflection in depth prior to implementation. Jersey's central location in the Channel and the scientific knowledge available should enable the various marine uses to coexist without harming ecosystems.
3. The French authorities question the validity of certain closure measures:
 - Regarding the exclusion corridors prohibiting towed gear, due to the presence of undersea cables, the French authorities question their usefulness in view of the burial work carried out precisely to avoid any interaction between these two uses. There is currently frequent fishing activity in these areas. In addition, these closures would have a widespread socio-economic impact because their layout and position make them impossible to bypass during a fishing operation. The French authorities therefore request that these proposed closures be excluded from the management plan and be the subject of in-depth discussions about existing risks.
 - Justification for the closure of Zone C in the south-east of Jersey's EEZ (Les Sauvages reef) is set out on page 86 of the consultation document. It states that Les Sauvages reef has 10 years'-worth of surveys carried out by divers and supports an exceptional range of species (described in EB/NB/11), including rare and slow-growing species such as sea fans and corals; as well as submerged prehistoric archaeological sites. Jersey deems this exceptional site to be threatened by static gear, as traps and lines snag seabed flora and fauna, and would like it to

be fully protected (NTZ) without waiting for further analysis of the benefits of the existing Portelet NTZ. France was unable to consult document EB/NB/11 (entitled "A baseline description of the benthic assemblages of Les Sauvages reef", Jersey Blue Marine Foundation, 2023). France requests that the benefits of such a closure in an area important for static fishing gear be demonstrated by a scientific consensus prior to possible measures. Furthermore, rare species have developed when static gear fishing has continued, which shows that this type of fishing is compatible with these rare species.

In addition, the envisaged **wind farm** in the south-west of Jersey waters is a laudable initiative in the context of the common goal to achieve carbon neutrality by 2050. However, in order not to make the impact of these measures on fishing activities even more severe, the wind-farm section of the current plan should be detailed. In this way, the overall impact of the JMSP can be quantified and anticipated, which will help to alleviate the feeling of successive reductions in fishing rights in Jersey waters. In particular, it will need to be specified whether fishing will be permitted within the wind farm, and under what terms.

The French authorities are also proposing that bilateral discussions be set up to examine the various connection options for the wind farm envisaged in Jersey waters. These discussions will make it possible to co-construct a coherent connection network and identify possible landing points on the French coastline. The latter will have to take account of the capacity of the electricity grid in Western France, which may require studies and investment for which the *Direction Générale de l'Energie et du Climat* (DGEC) and RTE, the French electricity grid operator, will be your contacts. Furthermore, the DGEC is contributing on France's behalf to the specific consultation set up on the issue.

Given the proximity to the Saint-Brieuc wind farm of the areas envisaged at this stage, it will also be beneficial if in-depth discussions on the siting of offshore wind farms in Jersey waters and French waters focus on the details of their geographical location. These constructive discussions will have to help ensure maritime safety in the area, prevent any masking effects and maximize production capacity.

The French authorities also welcome the close attention paid to maritime safety issues and the maintenance of shipping lanes to St Helier. We share the same concern for a coherent distribution of maritime space between the envisaged wind farm and the shipping lanes, particularly for ferries departing from Saint-Malo.

Finally, with a view to developing joint use of offshore wind farms, the French authorities are also willing to exchange knowledge to help develop best practice.

In this respect, sharing feedback would be beneficial for the seaweed-farming project envisaged by Jersey, as well as for any possible coexistence with fishing activities.

In a constructive spirit of good neighbourliness, the French authorities are therefore at Jersey's disposal to organize working meetings that will enable sustainable and harmonious development in the Bay of Granville.

In assuring them of France's shared ambition for the peaceful coexistence of maritime activities, the energy transition and the preservation of biodiversity, the French authorities thank the Jersey authorities for taking these comments on board.

Appendix 1: Process for Establishing Fishery Closure Areas

The JMSP is based on the analysis of the specific ecological characteristics of the different habitats of the territorial area to establish stronger protection zones on the basis of a precautionary principle. The objective is both to eliminate current impacts and to avoid future impacts in advance, in order to allow the seabed to function naturally.

The scientific underpinnings of the JMSP are clear and rigorously explained, and the approach appears to be coherent and comprehensive. However, the appendices documenting the technical details of the data and methods used for each ecological criteria analysis could not be consulted. In particular, it is essential that the 11 key documents presented in section 8.1.2 on page 81 of Chapter 8 be made available.

It should be noted that the RAMSAR, OSPAR, carbon and rich habitat protection areas merge to a large extent to give a priority protection area of around of 2.7% of Jersey's waters. The type of habitat effectively leads to certain areas accumulating protection benefits, which justifies the argument of prioritization of protection.

This result is consistent with the results of the IPREM project led by IFREMER. However, the JMSP is not based on measuring the real impact of fishing pressure. The proposed measures are therefore precautionary measures and not directly related to the existing fishing activity.

The study gives little consideration for the actual current level of pressure, disturbance and degradation by towed gear. The fishing maps p. 136-137 are not very precise and limited to presence/absence mapping, but without quantification of the intensity gradient.

The French authorities therefore stress that it is important to distinguish in this exercise between what is a proven impact on the environment and what is a precautionary measure linked to a potential impact that does not exist to date. In this respect, we present below the map of the intensity of French fishing activities with mobile fishing gear in the waters of the Western Channel (Fig. 10). We also present the potential impact on habitats quantified by IFREMER in the IPREM report.

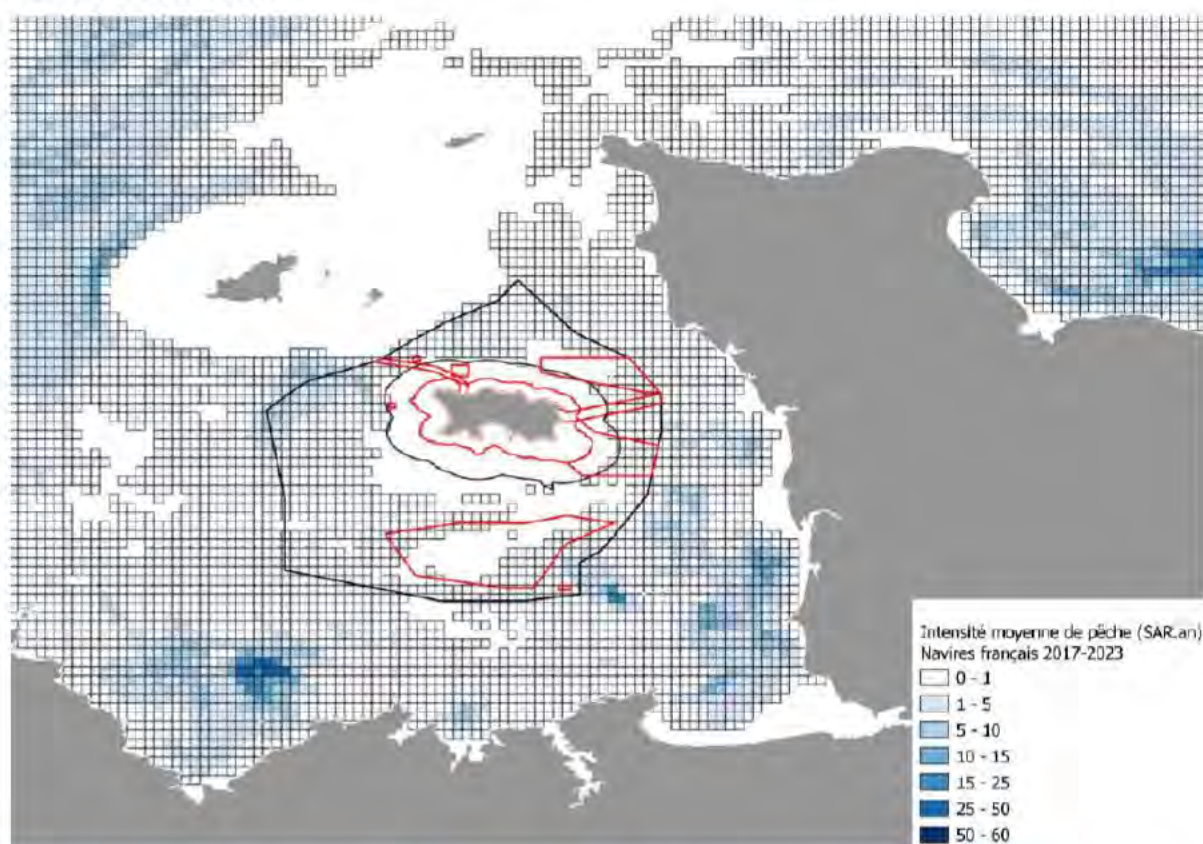


Figure 10 : Intensité de pêche SAR année⁻¹ moyenne 2017-2023. Les informations ici données représentent l'effort de pêche des navires français, avec la marque des zones de fermeture proposées.

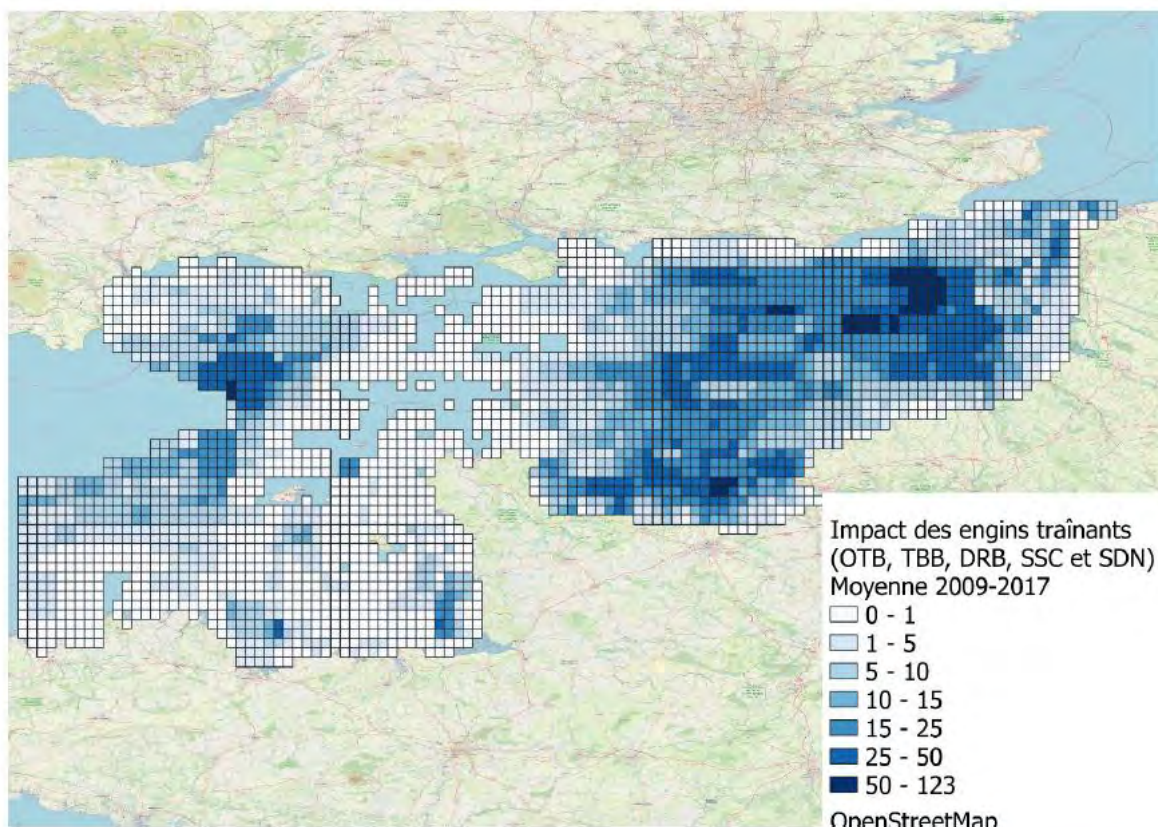


Figure 11 : Indice d'impact cumulé des engins de pêche trainant considérant les risques pour les différents habitats et l'intensité de pêche moyenne entre 2009-2017 pour toute l'Europe, sur une résolution spatiale de carrés de $0.05^\circ \times 0.05^\circ$. L'intensité de pêche de chaque engin a été multipliée par un indice de sensibilité associé à chaque habitat, pour obtenir le cumul, les indices d'impact associés à chaque engin ont été additionnés. L'intensité de pêche utilisée pour le calcul de l'indice se réfère à toute l'Europe en zones VIIe et VIId (ICES, 2018) et est exprimée en SAR-1 (Swept Area Ratio), qui correspond à la surface balayée divisée par la surface de la cellule de la grille. Le SAR par carré statistique représente le nombre de fois théorique où le carré est totalement balayé en admettant que l'effort de pêche est homogène sur l'ensemble du carré. (Figure 30 du rapport IPREM)

Appendix 2: Impact on French fishing activity

As has been recalled, taking into account the socio-economic impact ensures the sustainability of a management plan such as the one presented by Jersey. The French authorities warn of the strong impact that the proposed closures would have on fishing activity. For vessels that have frequented Jersey waters with a VMS geolocation system, this impact has been quantified by IFREMER. Of the 137 vessels holding an access licence, 22 vessels are impacted by the closure of Zone B and 12 by the closure of Area C. This impact can be up to 60% of the total turnover for a vessel for Area B.

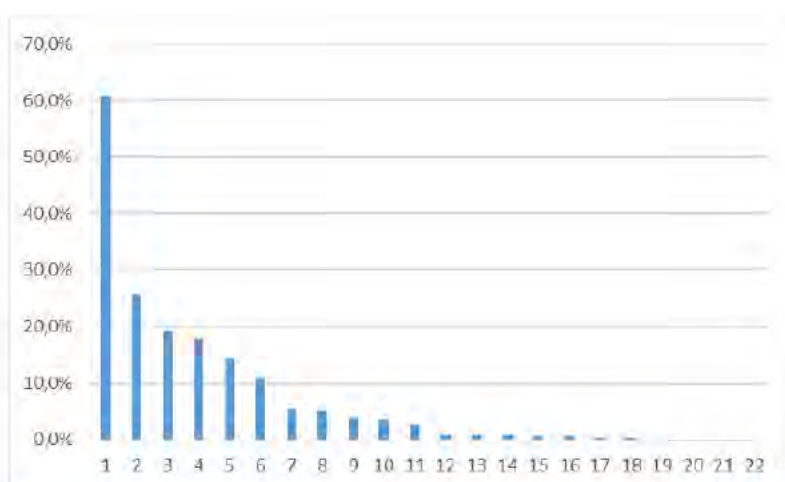


Figure 12 : part du CA 2023 par navire couvert par la VMS issu de l'activité aux arts trainants en zone B

The French authorities request that this impact be taken into account in the way in which the management plan will be implemented and that they be made available to propose measures to minimise the impact on these vessels.

Draft Jersey Marine Spatial Plan Consultation

Response from Blue Marine Foundation

28 January 2024

Blue Marine has been working in Jersey since 2018, conducting research, education and supporting sustainable fishers. Our work has included (but not limited to):

- Supporting a PhD to measure the recovery of marine life within Jersey's existing MPAs. This has provided crucial evidence that areas protected from mobile fishing gear, such as dredging and trawling, result in improved biodiversity and abundance of species¹. The study also found that less than three per cent of habitats associated with Jersey's most valuable commercial fishery species are protected from mobile gear².
- A further six MSc students, supported by Blue Marine, have undertaken similar research, further strengthening the evidence base for marine protection and appropriate fisheries management³.
- Supporting research to assess the movement and storage of blue carbon in Jersey's marine environment. Phase one, a desk-based study, has been published⁴, finding that Jersey's seabed permanently removes (sequesters) over 10,000 tonnes of carbon annually, with further ground truthing work in progress.
- Production of other research reports, including "A cost benefit analysis of a static gear marine park⁵", an ecosystem service valuation⁶ and a biodiversity assessment of a local offshore reef⁷.
- Development and support of models of sustainable fishing (such as scallop potting and diving).
- Conducting fisher-involved research to inform local fisheries management and safeguard the future of commercially important species.
- Launched Jersey Hand Dived and Jersea to spread awareness of small-scale, low-impact fishing throughout the community.
- Building connections between people and the sea. Blue Marine launched Snorkel Portelet and Snorkel Bouley, in 2022 and 2023 respectively, providing residents and tourists the opportunity to explore Jersey's amazing marine environment. Created by Blue Marine, in partnership with the Societe Jersiaise, the snorkel trails are the first of a new network planned for the Island. This was paired with a comprehensive education programme providing the opportunity for 600 school children between the ages of nine and 11 to connect with their local marine environment.

¹ Samantha R. Blampied, Sian E. Rees, Martin J. Attrill, Francis C.T. Binney, Emma V. Sheehan, *Removal of bottom-towed fishing from whole-site Marine Protected Areas promotes mobile species biodiversity*, *Estuarine, Coastal and Shelf Science*, Volume 276, 2022, 108033, ISSN 0272-7714, <https://doi.org/10.1016/j.ecss.2022.108033>.

² Blampied, S. R., Sheehan, E. V., Binney, F. C., Attrill, M. J. & Rees, S. E. (2022). *Value of coastal habitats to commercial fisheries in Jersey, English Channel, and the role of marine protected areas*. *Fisheries Management and Ecology*, 29, 734–744. <https://doi.org/10.1111/fme.12571>

³ *Seagrass habitats get better with age: A comparison between blue carbon storage and species diversity in old and young seagrass beds* (University of Plymouth, 2021), *Investigating the effectiveness of two Marine Protected Areas of different ages on species recovery in Jersey, Channel Islands* (University College London, 2022), *Assessment of essential sand eel habitat extent and distribution around Jersey (Channel Islands) in relation to the management of local puffin (Fratercula arctica) populations* (University of Plymouth, 2022), *The Seasonal, Spatial, and Size Related Patterns of European Lobster (Homarus gammarus) Spawning in a Jersey, English Channel, Fishery* (University of Plymouth, 2023), *Monitoring the effectiveness of Jersey's Marine Protected Areas (MPAs) for mobile marine fauna*. (University of Plymouth, 2023) and *The assessment of species diversity and carbon storage of Jersey's seagrass beds in relation to their age and condition, and partial condition evaluation of seagrass beds in the UK Channel Islands*. (University of Plymouth, 2023).

⁴ <https://www.gov.je/SiteCollectionDocuments/Environment%20and%20greener%20living/R%20Blue%20Carbon%20Resources%20Report%20An%20Assessment%20of%20Jersey%E2%80%99s%20Territorial%20Seas.pdf>

⁵ https://www.blumarinefoundation.com/wp-content/uploads/2022/10/3299R01C_MEP-Fisheries-review-and-impact-assessment_FINAL.pdf

⁶ https://www.blumarinefoundation.com/wp-content/uploads/2023/05/20230406_Jersey_ESV_Report.pdf

⁷ Rees, A., Williamson, A., Watson, F., Fanshawe, S. 2023. *A baseline description of the benthic assemblages of Les Sauvages reef, Jersey. A report for Blue Marine Foundation*. Pp 44.

The cumulation of the evidence gained through this work has underpinned our proposal for a well-managed network of MPAs in the form of a Marine Park, closed to bottom-towed fishing gear, to cover over 30 per cent of Jersey's territorial waters. We feel that several aspects resonate closely to our core objectives, particularly around Marine Protected Areas and support for sustainable fishing. As a result, we are in full support of the JMSP proposals of 27 per cent marine protection (including undersea cable exclusion zones), as well as the proposed support for sustainable fishing. However, we propose for further MPA coverage (to reach 30 per cent) and feel that further amendments and actions are needed to ensure clarity, commitment and appropriate and equitable introduction of the actions and measures necessary to achieve the ambition of the JMSP.

Below, we have responded to priorities which are within our technical expertise and within our charitable remit. We have no opposition to all other priorities outlined in the draft MSP.

Please contact Freddie Watson, Jersey Project Manager, for any further clarification.

freddie@bluemarinefoundation.com

Chapter	Priority	Action(s)	Evidence/justification	Blue Marine statement	Blue Marine recommendations for revised and additional actions
General	JMSP	Fishing Zone B (Seabed Protection Area) covers approx. 27.22% of Jersey's waters, and includes MPAs and existing and proposed mandatory exclusion corridors around undersea power cables.	<p>Jersey is a signatory to a number of international conventions which oblige it to protect its marine environment. Examples include the '30 by 30' target (i.e. Target 3 which outlines 30% of terrestrial and marine environments by 2030) agreed at the 2022 Kunming-Montreal Global Biodiversity Framework⁸, and the OSPAR Convention, which identifies a series of threatened habitats and species which should be protected⁹. The GBF includes 196 countries as signatories, it is a historic agreement and Jersey would show world leadership by protecting 30% of its waters by 2030.</p> <p><i>Full text of target 3 of the GBF: Ensure and enable that by 2030 at least 30 per cent of terrestrial and inland water areas, and of marine and coastal areas, especially areas of particular importance for biodiversity and ecosystem functions and services, are effectively conserved and managed through ecologically representative, well-connected and equitably governed systems of protected areas and other effective area-based conservation measures, recognizing indigenous and traditional territories, where applicable, and integrated into wider landscapes, seascapes and the ocean, while ensuring that any sustainable use, where appropriate in such areas, is fully consistent with conservation outcomes, recognizing and respecting the rights of indigenous peoples and local communities, including over their traditional territories.</i></p>	Fully support proposed 27%. However, to meet commitments this should be increased to 30%	<p>Blue Marine proposes:</p> <ol style="list-style-type: none"> 1) Inclusion of the area between Les Anquettes/SE and the Minquiers to provide connectivity, and protect a large area of kelp that is not protected under the current proposed MPA coverage. From fishing patterns outlined in the draft MSP, this area is not subjected to mobile fishing gear and therefore displacement of local vessels would be minimal. 2) Include a large area of maerl NE of the proposed Minquiers MPA extension which is currently not protected under proposed plans.

⁸ <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

⁹ https://www.ospar.org/site/assets/files/1290/ospar_convention.pdf

Financing	JMSP	N/A	The draft JMSP lacks a detailed budget and financing plan for its potential delivery. Funding for the delivery of MSPs often come from the governing authority. However, the Government of Jersey has an opportunity to explore sustainable financing models such as credit structures including nature positive biodiversity credits, investment from private finance such as tourism and user fees, and loan/debt structures. These have proven to contribute to marine spatial planning and delivery of MPAs ¹⁰ .	Blue Marine propose that a financing strategy for the delivery of the JMSP is developed.	Blue Marine proposes the addition of the following commitment in the final JMSP: To deliver the JMSP, the Government of Jersey will explore avenues of sustainable financing mechanisms to secure the long-term funding for sustainable marine use and management, such as biodiversity monitoring, financial support for small scale, low impact fishing and compensatory measures for displaced fishing.
Chapter 8.2: No Take Zones	Priority NB1: No Take Zones. To support current and future No Take Zones for the most important and valuable marine resources.	Action NB1a: The existing No Take Zone at Portelet Bay will be retained and will continue to be monitored.	One NTZ already exists in Jersey territorial waters allowing monitoring of changes to ecological health after removal of fishing, and how the local marine environment reacts to environmental change where other pressures are removed. ¹¹	Fully supportive	Blue Marine formally requests a change to the wording on p85 from 'Three additional areas have been proposed for NTZs in the consultation for this MSP: Les Sauvages Reef (south-east of Les Minquiers) (proposed by Blue Marine);...' to, ' Les Sauvages Reef (south-east of Les Minquiers) has specifically been recommended for further protection (based on evidence which shows significantly high levels of biodiversity). Additionally, two areas have been proposed for NTZs: Archirondel and Anne Port Bays... '
		Action NB1b: A new No Take Zone will be designated at Les Sauvages, with the boundary determined following a review of the evidence against agreed criteria.	NTZs are well documented to significantly improve fish biomass through the restoration of complex habitats and ecosystems. While this results in ecological benefits within local and surrounding areas, NTZs have also shown to have a positive impact on local economies through improved fisheries and ecotourism ¹² .	Fully supportive	
		Action NB1c: Subject to the impacts and effects of the Portelet Bay and Les Sauvages No Take Zones being found to be positive, further No Take Zones will be considered within Jersey's waters. These should be targeted to achieve social and biodiversity goals.	It should also be noted in Chapter 8.2.1 of the draft MSP that Blue Marine have never recommended for Les Sauvages to be a NTZ. Evidence Base Document EB/NB/11 clearly recommends for the site to be 'considered for further protection and robust fisheries management approaches are proposed, consulted upon and delivered.'. This should be clarified in the relevant section of the JMSP.	Fully supportive	

¹⁰ https://www3.weforum.org/docs/WEF_FOA_The_Ocean_Finance_Handbook_April_2020.pdf

¹¹ <https://collections.societe.je/posts/sj-projects/2022/11/portelet-no-take-zone>

¹² Enric Sala, Sylvaine Giakoumi, No-take marine reserves are the most effective protected areas in the ocean, *ICES Journal of Marine Science*, Volume 75, Issue 3, May-June 2018, Pages 1166–1168, <https://doi.org/10.1093/icesjms/fsx059>

Chapter 8.6: Marine habitats and Marine Protected Areas	Priority NB5: Marine Protected Areas (MPAs). To protect marine habitats through the expansion of the network of Marine Protected Areas, to cover at least 30% of Jersey's waters by 2030.	Action NB5a: The existing Marine Protected Areas (MPAs) will be extended and linked to cover the inshore area; the offshore reefs (Les Écréhous, Les Minquiers, the Paternosters and Les Anquettes), and parts of the sedimentary basins which contain a high coverage of OSPAR listed habitats. No mobile fishing gear will be permitted to be used within the MPAs.	<p>Based on evidence from research in Jersey and other locations in the UK, protection of the proposed areas from trawling and dredging are expected to result in recovery and expansion of nationally important habitats. These areas also serve as important nursery, spawning and feeding grounds, and protection in this form would lead to an increase in biodiversity^{13,14} and increased resilience to storms and climate change^{15,16}. The increase in biodiversity as a result of MPA implementation is also expected to benefit the local fishing industry through increased abundance of commercially important stocks¹⁷.</p> <p>The implementation of MPAs can also have significant economic benefits through the delivery of ecosystem services. As part of the consultation, Blue Marine submitted an Ecosystem Service Valuation (ESV) referred to as 'Evidence Base document EB/NB/9' in the draft JMSP. This model has now been updated (report attached with the submission of this response) with the JMSP MPA scenario, calculating revised net estimates for a net ecosystem service impact value of £1.6m, £9.6m and £27.8m over a 5-, 10- and 20-year period respectively after designation. These numbers reflect the net impact after considering the cost of lost fishing which was estimated to be £15.9m, £44.4m and £104.2m over a 5-, 10- and 20-year period respectively.</p> <p>While the net impact may be positive over the longer term, stakeholders affected (both economically and socially) by displacement from traditional fishing grounds due to the introduction of MPAs need support to make a just transition. To assess the impact and identify and fund appropriate and proportionate measures to support this transition, a socio-economic impact assessment is needed. This should not delay</p>	Supportive – minor proposed amendment and two additional actions.	<p>Blue Marine recommends the following changes:</p> <p>1) The final sentence of Action NB5a should be amended to: 'No mobile fishing gear or destructive/damaging development will be permitted to be used/take place within MPAs.'</p> <p>2) Priority NB5 should include an additional Action as follows: 'Action NB5d: A comprehensive socio-economic impact assessment will be carried out immediately. Following outputs, fair compensatory measures and/or alternatives will be provided to affected fishermen within the mobile fishing sector impacted by the designation of MPAs.'</p> <p>3) Priority NB5 should include an additional Action as follows: 'Action NB5e: An enforcement and biodiversity monitoring programme will be established to ensure compliance within MPAs and understanding of their ecological impact.'</p>
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¹³ Chloe Renn, Sian Rees, Adam Rees, Bede F R Davies, Amy Y Cartwright, Sam Fanshawe, Martin J Attrill, Luke A Holmes, Emma V Sheehan, *Lessons from Lyme Bay (UK) to inform policy, management, and monitoring of Marine Protected Areas*, ICES Journal of Marine Science, 2024,; fsad204, <https://doi.org/10.1093/icesjms/fsad204>

¹⁴ Samantha R. Blampied, Sian E. Rees, Martin J. Attrill, Francis C.T. Binney, Emma V. Sheehan, *Removal of bottom-towed fishing from whole-site Marine Protected Areas promotes mobile species biodiversity*, Estuarine, Coastal and Shelf Science, Volume 276, 2022, 108033, ISSN 0272-7714, <https://doi.org/10.1016/j.ecss.2022.108033>.

¹⁵ Sheehan EV, Holmes LA, Davies BFR, Cartwright A, Rees A and Attrill MJ (2021) Rewilding of Protected Areas Enhances Resilience of Marine Ecosystems to Extreme Climatic Events. *Front. Mar. Sci.* 8:671427. doi: 10.3389/fmars.2021.671427

¹⁶ Roberts, Callum & O'Leary, Bethan & Mccauley, Douglas & Cury, Philippe & Duarte, Carlos & Lubchenco, Jane & Pauly, Daniel & Sáenz-Arroyo, Andrea & Sumaila, Rashid & Wilson, Rod & Worm, Boris & Castilla, Juan. (2017). *Marine reserves can mitigate and promote adaptation to climate change*. *Proceedings of the National Academy of Sciences*. 114. 201701262. 10.1073/pnas.1701262114.

¹⁷ Blampied, S. R., Sheehan, E. V., Binney, F. C., Attrill, M. J. & Rees, S. E. (2022). *Value of coastal habitats to commercial fisheries in Jersey, English Channel, and the role of marine protected areas*. *Fisheries Management and Ecology*, 29, 734–744. <https://doi.org/10.1111/fme.12571>

			<p>statutory introduction of the MPAs, but must be initiated at the soonest possible time. Following the socio-economic impact assessment, dialogue with the fishing industry is needed to identify the most effective, equitable and proportionate support measures to enable a just transition.</p> <p>Blue Marine has commissioned a study to better understand the costs and benefits of a just transition for UK inshore fisheries. The study considers realistic options to replace existing destructive fishing practices with lower-impact marine activities. A framework is being developed that can be applied to demonstrate the social, economic and environmental impacts of transition options. This will be published in March 2024 and could be very relevant for the Government of Jersey to consider.</p> <p>A comprehensive MPA monitoring programme should be integral to the delivery of priority NB5 as this is necessary to provide accurate assessments of the performance and impact of implementing MPA management measures and inform adaptive management¹⁸.</p> <p>The efficacy of MPAs is known to increase if well enforced¹⁹. Therefore, an enforcement regime must be designed and delivered alongside any MPA designations.</p>		
		Action NB5b: Legislation will be revised to give the MPAs a statutory basis.	<p>Statutory legislation for marine management has historically proved to achieve better results when compared to voluntary MPAs²⁰.</p> <p>It is important to clearly state the timeframe for introduction of this legislation and Blue Marine believes that this should be by January 2025.</p>	Fully supportive with a recommendation to commit to a set timeframe	Proposed amendment to Action NB5b: “Legislation will be revised to give the MPAs a statutory basis by January 2025 ”.

¹⁸ Chloe Renn, Sian Rees, Adam Rees, Bede F R Davies, Amy Y Cartwright, Sam Fanshawe, Martin J Attrill, Luke A Holmes, Emma V Sheehan, *Lessons from Lyme Bay (UK) to inform policy, management, and monitoring of Marine Protected Areas*, ICES Journal of Marine Science, 2024,; fsad204, <https://doi.org/10.1093/icesjms/fsad204>

¹⁹ Irene Rojo, Julio Sánchez-Meca, José A. García-Charton, *Small-sized and well-enforced Marine Protected Areas provide ecological benefits for piscivorous fish populations worldwide*, Marine Environmental Research, Volume 149, 2019, Pages 100-110, ISSN 0141-1136, <https://doi.org/10.1016/j.marenvres.2019.06.005>.

²⁰ Prior, S (2011) *Investigating the use of voluntary marine management in the protection of UK marine biodiversity*. Report to Wales Environment Link

		Action NB5c: Further research will be undertaken in order to inform the future expansion of the Marine Protected Area network. This will include gaining greater understanding of the distribution of ross worm habitats, and the potential consequences of the changed MPA boundaries on habitats and species.	Jersey's responsibilities under the Global Biodiversity Framework (GBF) are clear. As the Government of Jersey chose to have the UK's signature to the United Nations Convention on Biological Diversity extended to itself in 1994, Jersey has a clear responsibility to reflect relevant frameworks in local policy. This therefore includes 30 per cent marine protection by 2030 (30x30), as outlined in target three of the GBF ²¹ .	Fully supportive- this action is necessary to meet the Island's commitment to the international 30x30 target.	
Chapter 8.7: Seagrass	Priority NB6: Seagrass Habitat Management Areas. To designate Seagrass Habitat Management Areas to promote the protection and regeneration of seagrass.	Action NB6a: Seagrass Habitat Management Areas should be established in St Catherine's Bay, Archirondel and Anne Port, the Royal Bay of Grouville, South-East Reefs and St Aubin's Bay, where damaging activities will be restricted. It will be necessary to explore options regarding their legal framework.	Seagrass is a highly important habitat, supporting high biodiversity, spawning and nursery grounds for commercial fish ^{22,23} and drawing down and storing carbon ²⁴ . Nearly 97 per cent of Jersey's existing seagrass beds already lie within the existing MPAs and are therefore protected from trawling and dredging. However, a significant number of boat moorings are known to cause damage ^{25,26} , resulting in an estimated 6000m ² of seagrass being lost to date ²⁷ . The potential natural recovery and expansion of seagrass beds achieved by restricting damaging activities such as anchoring in the proposed areas would boost local marine biodiversity as well as mitigate the impacts of climate change ²⁸ . These actions would also further contribute to Jersey's Carbon Neutral Roadmap ambition to double the extent of seagrass habitats.	Fully supportive – minor proposed revision	Proposed revision to Action NB6a: 'Seagrass Habitat Management Areas will be established in...'
		Action NB6b: Subject to the findings of research into seagrass-friendly moorings proving to be positive, such moorings should become required within Seagrass Habitat Management Areas.		Supportive – minor amendment to action proposed	Proposed revision to action NB6b: '...', such moorings will become required, with legislation introduced to ensure mandatory use within Seagrass...'

²¹ <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

²² Unsworth, Butterworth, Freeman, Fox, Priscott. *The ecosystem service role of UK Seagrass meadows. Project Seagrass – May 2021.* <https://www.projectseagrass.org/wp-content/uploads/2022/06/ES-of-UK-seagrass-Unsworth-et-al.pdf>

²³ Jackson, Emma & Rowden, Ashley & Attrill, Martin & S.J. Bossey & B. Jones. (2001). *The importance of seagrass beds as a habitat for fishery species. Oceanography and marine biology.* 39. 269-304.

²⁴ Dahl, M., Asplund, M.E., Björk, M. et al. *The influence of hydrodynamic exposure on carbon storage and nutrient retention in eelgrass (Zostera marina L.) meadows on the Swedish Skagerrak coast. Sci Rep* **10**, 13666 (2020). <https://doi.org/10.1038/s41598-020-70403-5>

²⁵ Collins, K.J. & Suonpää, A.M. & Mallinson, J.J.. (2010). *The impacts of anchoring and mooring in seagrass, Studland Bay, Dorset, UK. Underwater Technology: The International Journal of the Society for Underwater.* 29. 117-123. 10.3723/ut.29.117.

²⁶ Jackson, E.L., Rowden, A.A., Attrill, M.J., Bossey, S., Jones, M., 2001. *The importance of seagrass beds as a habitat for fishery species. Oceanography and Marine Biology* 39, 269-304.

²⁷ *Blue Carbon Resources, an Assessment of Jersey's Territorial Seas* p.50.

²⁸ <https://catchmentbasedapproach.org/learn/seagrass-restoration-handbook/>

Chapter 9.4: Proposed fishing zones	Priority FA1: Fishing zones. To introduce an area-based, three-zone system comprising:	Fishing Zone A (Lightly Regulated Fishing Area)	It is likely that tiered systems like this will help to provide clarity and resolve conflicts between different fishing activities and other marine uses/values such as development, recreation, biodiversity and blue carbon.	Fully supportive with minor amendment proposed.	Proposed amendment to Fishing Zone A: 'Fishing zone A (Lightly Regulated Fishing Area)'
		Fishing Zone B (Seabed Protection Area)	The MSP lacks management for recreational fishing and should consider developing a recreational fishing code/guidance document to help promote best practice.	Fully supportive	
		Fishing Zone C (No Take Zones)	The JMSP does not outline suitable areas for potential sustainable aquaculture/phyticulture. Aquaculture farms (including bivalve and seaweed farming) can play a significant role in cycling nutrients, creating habitats and nursery grounds to promote recruitment of fish, and generate economic growth through production and employment ²⁹ . Areas for these activities should be outlined in the JMSP and supported by updating existing regulations and frameworks.	Fully supportive – additional fishing zone proposed	Additional proposed fishing zone: 'Fishing Zone D (Sustainable and Innovative Aquaculture)'
		Action FA1a: Fisheries regulations will be updated to reflect the new area- based system, following the standard process with regard to consultation.	It is vital for fisheries regulations to be updated in line with new management measures. This will help to ensure enforcement of new measures such as MPAs. Regulation measures should be updated and implemented before January 2025 and necessary discussions on mitigating impact on displaced fishermen should start as soon as possible.	Fully supportive	Proposed amendment to Action FA1a: "Fisheries regulations will be updated by January 2025 to reflect the new area-based system, following the standard process with regard to consultation."
		Action FA1b: A programme of public engagement will be undertaken with the Jersey and French fishing fleets to make sure that all are aware of the new system.	As Jersey's waters experience fishing from the local commercial fleet, the French commercial fleet and a significant local recreational fishing sector, engagement with these three stakeholder groups is key to ensure compliance. In addition to engagement with the commercial fishing sector, the MSP should include engagement with the recreational fishing sector and the development of a recreational fishing code of conduct to mitigate environmental impact of this fishing sector.	Fully supportive	Proposed amendment to action FA1b: "...undertaken with the Jersey and French fishing fleets and recreational fishing sector to make sure that all are aware of the new system."

²⁹ Luke T. Barrett, Seth J. Theuerkauf, Julie M. Rose, Heidi K. Alleway, Suzanne B. Bricker, Matt Parker, Daniel R. Petrolia, Robert C. Jones, Sustainable growth of non-fed aquaculture can generate valuable ecosystem benefits, *Ecosystem Services*, Volume 53, 2022, 101396, ISSN 2212-0416, <https://doi.org/10.1016/j.ecoser.2021.101396>.

Chapter 9.7: Encouragement and promotion of sustainable fishing	Priority FA5: Sustainable fishing. To support and promote facilities and actions which support sustainable fishing.	Action FA5a: The marketing of sustainably-caught fish should be promoted by the creation of a sustainability mark or similar mechanism to indicate high quality and sustainability in Jersey's fisheries.	Existing barriers such as cost, infrastructure and marketing can hinder achieving a thriving economically and environmentally sustainable fishing industry. Jersey's 'Genuine Jersey', 'Genuine Jersey Line Caught Bass' and 'Jersey Hand Dived' are all good examples of a sustainability mark. Lyme Bay is a very good example of how measures such as installing ice machines and chiller units in ports can maintain freshness of catch and thus ensure competitive market prices. ³⁰	Fully supportive – minor amendments proposed.	Proposed amendment to Action FA5a: '...sustainably-caught fish will be promoted by the creation, auditing and enforcement of a sustainability mark...'
		Action FA5b: The provision of appropriate marine and onshore facilities for sustainable fishing will be encouraged.	Grant schemes such as the UK Government's Fisheries and Seafood Scheme managed by the MMO in the UK has provided vital support for the fishing community to develop the necessary infrastructure and innovations to improve the quality of catch and marketing.	Fully supportive – moderate amendments proposed and one additional action	Proposed amendment to Action FA5b: '...onshore facilities, such as ice machines, chiller units and processing hubs , for sustainable fishing will be encouraged and given financial support from the government. '
			Promotion of sustainable fishing can also be achieved through exploring methods of transition away from damaging fishing methods, as well as diversification away from target species and efforts to reduce carbon emissions.		Proposed additional action: ' Action FA5c: The development of initiatives and incentives to support a just transition to fishing practices that have least impact on the seabed, non-target species and emissions. '
Chapter 11.4: Enhancing access to the marine environment	Priority RT3: Access to the marine environment. To promote and manage access to the marine environment for the benefit of all.	Action RT3a: All existing public access to the coast and foreshore should be maintained. Opportunities should be sought to improve access for those with diverse needs.	Accessibility for all user needs is crucial in maximising the Island's community connection with the sea.	Fully supportive – minor amendment proposed.	Proposed amendment to Action RT3a: '....Opportunities will be sought to improve access...'
		Action RT3b: Community/health/sports /education organisations will be encouraged to use the coast for physical activity, education and for the enhancement of well-being.	Organisations such as Blue Marine, Societe Jersiaise, Jersey Marine Conservation, National Trust for Jersey, Bouley Bay Dive Centre, Jersey Heritage, Healing Waves, Jersey Kayak Adventures, Seafaris and many others are all undertaking effective ways of connecting people to the sea, resulting in enhanced education, awareness and appreciation of the marine environment. However, monitoring of recreational	Fully supportive – additional action proposed	Proposed additional action: ' Action RT3d: A monitoring programme will be developed and implemented to assess and manage any impacts of changes in accessibility and added infrastructure. '

³⁰ Rees, S.E., Ashley, M., Evans, L., Mangi, S., Rodwell, L., Attrill, M., Langmead, O., Sheehan, E., Rees, A. 2016. An evaluation framework to determine the impact of the Lyme Bay Fisheries and Conservation Reserve and the activities of the Lyme Bay Consultative Committee on ecosystem services and human wellbeing. A report to the Blue Marine Foundation by research staff the Marine Institute at Plymouth University, Exeter University and Cefas. pp

³¹ More Food, More Jobs and More Money in the UK. Oceana's Recipe for Fish Recovery: <https://europe.oceana.org/press-releases/transition-sustainable-fishing-could-land-uk-nearly-30-more-fish/>

			activity within the marine environment is necessary to ensure sustainable use and to minimise human impact.		
		Action RT3c: The safe storage of recreational equipment at the coast should be promoted in order to minimise transportation needs and reduce the need to store equipment on beaches. Guidance should be produced on suitable locations and designs for such facilities.	The reduction of transportation needs will likely increase accessibility while reducing emissions of these activities. Suitable locations and designs can be regulated and managed by existing resource in the planning department.	Fully supportive – minor amendments proposed	Proposed amendment to Action RT3c: ‘...at the coast will be promoted in order to... Guidance will be produced...’

Chapter 11.5: Respecting wildlife and habitats. Recreation at the offshore reefs	Priority RT6: Increasing public education and awareness. To promote responsible use and enjoyment of the coastal and marine environment through increasing public education and awareness.	<p>Action RT6a: A Seaside Code should be produced to encourage understanding of and respect for the coastal and marine environments through behaviours and actions including:</p> <ul style="list-style-type: none"> - Not touching protected species. - Replacing turned stones. - Not dropping litter. - Making sure fishing gear is correctly labelled. - Not leaving belongings on slipways. <p>Consider producing supplements to the Seaside Code for specific activities such as recreational and low water fishing.</p>	<p>Recreation is a significant and popular activity that takes place across Jersey's coastlines, seas and offshore reefs. Inherently, these activities can also negatively impact sensitive marine habitats³².</p> <p>Recreational fishing can generate significant littering issues if unmanaged and the Government of Jersey should commit to develop and promote a Code of Conduct for recreational shore and sea anglers to promote best practice.</p> <p>Seaside codes can work well in unison with safety guides. A combination of the two may streamline the process of both actions and simplify for user engagement.</p>	Fully supportive – but merged with Action RT6a with a specific additional action for a Recreational Angling Code of Conduct.	<p>Recommendation that the “Enjoying the Coast Safely” is combined and expanded to include the Seaside Code to create a Seaside and Safety Code to promote enjoyment of the coast safely and sustainably.</p> <p>Proposed additional action: ‘A specific Code of Conduct will be produced for recreational shore and sea fishing.’</p>
		<p>Action RT6b: The “Enjoying the Coast Safely” booklet should be revised and updated to include more references to good practice with regard to avoiding disturbance of wildlife and habitats.</p>		Fully supportive – but merged with Action RT6a	<p>Recommendation that the “Enjoying the Coast Safely” is combined and expanded to include the Seaside Code outlined in Action RT6a</p>

³² Kayleigh J. Wyles, Sabine Pahl, Richard C. Thompson, *Perceived risks and benefits of recreational visits to the marine environment: Integrating impacts on the environment and impacts on the visitor*, *Ocean & Coastal Management*, Volume 88, 2014, Pages 53-63, ISSN 0964-5691, <https://doi.org/10.1016/j.ocecoaman.2013.10.005>.

Chapter 11.6: Recreation at the offshore reefs	Priority RT7: Management Plans for offshore reefs. To produce Management Plans for the offshore reefs which integrate the management of recreation, Marine Protected Areas and Ramsar Sites.	Action RT7a: Holistic Management Plans for the reefs should be produced through collaboration with users and Residents' Associations. These will address local issues including recreation management, cultural heritage and the natural environment. Issues for consideration include the feasibility of limiting visitor numbers, introducing a permit system, employing reef wardens and identifying particularly sensitive wildlife areas where additional restrictions may be required.	The Ramsar Management Authority already balance the opinions and needs from multiple users across the offshore reefs and should therefore be regarded as a key contributor to the Holistic Management Plans for the reefs.	Fully supportive – minor amendments proposed	Proposed amendment to action RT7a: '...Holistic Management Plans for the reefs will be produced with users, the Ramsar Management Authority , and Residents' Associations...'
Chapter 12.3: Submarine cables	Priority IT1: Protection of submarine cables. To protect submarine cables which form critical national infrastructure from damage by anchors and mobile fishing gear.	Action IT1a: The existing mandatory protection corridors covering the Normandie 1 and 2 cables will be retained.	The recent classification of OECMs contributing to the global MPA network ³³ could allow any submarine cable protection zones to contribute toward Jersey's total MPA coverage. Although the reason for classification as an MPA is not for its environmental contribution, these protection zones will likely result in improvement of biodiversity, habitat regeneration and MPA connectivity to the surrounding marine ecosystem ³⁴ .	Fully supportive – additional action proposed	Proposed additional action: ' Action IT1d: Any areas around submarine cables designated protection from mobile fishing gear and anchorage will be put forward to the UNEP-WCMC (UN Environment Programme World Conservation Monitoring Centre) to be officially recognised as OECMs (other effective area-based conservation measures) '.

³³ <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

³⁴ Helena Alves-Pinto, Jonas Geldmann, Harry Jonas, Veronica Maioli, Andrew Balmford, Agnieszka Ewa Latawiec, Renato Crouzeilles, Bernardo Strassburg, Opportunities and challenges of other effective area-based conservation measures (OECMs) for biodiversity conservation, *Perspectives in Ecology and Conservation*, Volume 19, Issue 2, 2021, Pages 115-120, ISSN 2530-0644, <https://doi.org/10.1016/j.pecon.2021.01.004>.

		Action IT1b: A new mandatory protection corridor covering the Guernsey – Jersey 1 overlay power cable, and the adjacent Ingrid Fibre Optic Outtrigger telecommunications cable, should be created. The relevant legislation should be updated accordingly.		Fully supportive – minor amendment proposed	Proposed amendment to Action IT1b: ‘...telecommunications cable, will be created...’
		Action IT1c: Advisory protection corridors along other telecommunications cables will be retained.		Fully supportive	
		Action IT1d: Access to cable landfalls through intertidal areas for maintenance, repair and overlay will be retained.		Fully supportive	
		Action IT1e: Provision will be made for cable maintenance, repair and overlay along all existing cable routes.		Fully supportive – moderate amendment proposed	Proposed amendment to Action IT1e: ‘...existing cable routes in accordance to best environmental practice to mitigate ecological damage. ’
Chapter 12.5: FEPA offshore deposition site	Priority IT3: FEPA offshore deposition area. To retain the existing FEPA offshore deposition site.	Action IT3a: The size and location of the existing FEPA offshore deposition area will be reviewed in relation to potential future needs and environmental requirements, and steps will be taken to formalise its use.	<p>The deposition of substances such as construction materials, dredged materials, fish waste and burials at sea can have a significant negative impact on the marine environment and surrounding wildlife³⁵.</p> <p>Suspended sediment from the deposition of large quantities of dredged spoil and sediment can affect kelp and seagrass growth³⁶ and an assessment of the potential impacts of further deposition at existing or any new FEPA sites on the Seagrass Habitat Management Areas and MPAs should be undertaken as part of the licencing process to avoid impacts on protected features and habitats.</p>	Fully supportive – additional action recommended	Proposed additional action: ‘ Action IT3c: Any changes in the location and size of the FEPA offshore deposition site will be considered in light of an assessment of the potential impacts on any designated MPAs and Seagrass Management Areas. ’
		Action IT3b: A review of current legislation should be undertaken to ensure it is fit		Fully supportive – minor	Proposed amendment to Action IT3b: ‘...current legislation will be undertaken...’

³⁵ Mousavi, S.H., Kavianpour, M.R. & Alcaraz, J.L.G. The impacts of dumping sites on the marine environment: a system dynamics approach. *Appl Water Sci* **13**, 109 (2023).

<https://doi.org/10.1007/s13201-023-01910-9>

³⁶ https://www.blumarinefoundation.com/wp-content/uploads/2021/02/Sussex-Coast-Sediments-and-Kelp_HR-Wallingford_Blue-Marine-Final-Report-Jan-2023-secured.pdf

		for purpose for large-scale projects.		amendment proposed	
Chapter 12.6: Renewable energy: wind power	Priority IT4: Utility scale offshore wind generation. To support the principle of utility scale offshore wind generation in the south-western part of the Bailiwick.	<p>Action IT4a: The following requirements should be considered in the consenting framework, covering the windfarm itself, associated submarine cables and onshore facilities:</p> <ul style="list-style-type: none"> - best practice in marine conservation; - additional economic benefits, for example commercial seaweed production; - implications for search and rescue operations; and - minimisation of adverse impacts on visual and cultural heritage. 	<p>There are several environmental impacts associated with offshore wind farm developments, including bird strikes and direct impacts on benthic habitats and pelagic species (e.g. disturbance to migration routes)³⁷. There are also socio-economic impacts such as displacement of fishing³⁸, which will likely reduce the area available for mobile gear fishermen (additional displacement as a result of MPA designation).</p> <p>While the JMSP is not the appropriate avenue for the consultation of offshore wind development, it is important to have consenting frameworks in place to ensure best practice. Blue Marine has been exploring the opportunities for nature restoration in Offshore Wind Farms across the UK and has developed a decision tool to allow feasibility recommendations for both passive and active (i.e., utilising nature inclusive design) restoration approaches to be made³⁹. The utilisation of this tool should be considered by the Government of Jersey and associated developers to promote nature recovery as a key part of any development, contributing to 30 x 30 targets set out in the Kunming-Montreal Global Biodiversity Framework. The tool could also help facilitate passive approaches in terms of Offshore Wind Farm site identification potentially being placed in an area that promotes nature enhancement through de-facto protection.</p>	Fully supportive – minor amendments and one additional action proposed.	<p>Proposed amendment to Action IT4a: ‘...The following requirements will be considered in...</p> <ul style="list-style-type: none"> - best practice in marine conservation, with a focus on restoration opportunities including Nature Inclusive Designs (NIDs); - additional economic...’ <p>Proposed additional action: ‘Action IT4b: Two working groups will be established consisting of: (1) Conservation specialists to ensure best practice; and (2) Fishing sector representatives, to discuss appropriate measures to mitigate any impacts of displacement.’</p>

³⁷ Galparsoro, I., Menchaca, I., Garmendia, J.M. et al. Reviewing the ecological impacts of offshore wind farms. *npj Ocean Sustain* 1, 1 (2022). <https://doi.org/10.1038/s44183-022-00003-5>

³⁸ Gray, M., Stromberg, P-L., Rodmell, D. 2016. ‘Changes to fishing practices around the UK as a result of the development of offshore windfarms – Phase 1 (Revised).’ The Crown Estate, 121 pages. ISBN: 978-1-906410-64-3

³⁹ Opportunities for nature recovery within UK offshore wind farms. Blue Marine Foundation. GB3003. Final Report. April 17, 2023. Submitted by MRAG. [Opportunities-for-nature-recovery-within-UK-offshore-wind-farms_Final-Report-2.pdf \(bluemarinefoundation.com\)](#)

Chapter 12.7: Renewable energy: tidal power	Priority IT5: Tidal Power. To investigate the potential of using tidal power to generate electricity within Jersey's waters.	Action IT5a: work should continue into investigating the potential for renewable energy generation using tidal power, especially where this can be combined with sea defence.	With the proposed offshore wind development to the SW of Jersey's territorial water with the potential of an energy supply six times the amount of current island usage, further renewable energy may not be necessary. However, tidal power (in the form of barrages as being explored in St. Aubin's Bay) has proven to have adverse effects on the marine environment ⁴⁰ , and mitigation of this should remain at the forefront of any investigations.	Fully supportive – moderate amendment to action.	Proposed amendment to Action IT5a: '...with sea defence. Active engagement with environmental specialists will remain at the forefront of scoping work. '
Chapter 12.11: Research and logistics	Priority IT9: Maritime hub. To explore the potential for a Jersey-based maritime hub supporting research and development and logistics.	Action IT9a: Initial conversations with potential partners should be undertaken.	A maritime hub in Jersey could provide logistical support for marine activities, undertake research to better inform management, accommodate suitable infrastructure such as a hyperbaric chamber, as well as catering for other activities. Blue Marine and the National Trust for Jersey have discussed similar proposals and on request, are happy to provide the Government of Jersey with information that may be helpful in exploring the development of a maritime hub.	Fully supportive	
		Action IT9b: Integrating development of the hub with the design and logistics of the offshore wind farm should be considered.			
		Action IT9c: Potential sites (within St Helier and potentially elsewhere) should be explored.			

⁴⁰ Hooper, Tara & Austen, Melanie. (2013). Tidal barrages in the UK: Ecological and social impacts, potential mitigation, and tools to support barrage planning. *Renewable and Sustainable Energy Reviews*. 23. 289–298. 10.1016/j.rser.2013.03.001.



NEF Jersey Marine Model Findings

January 2024

The model estimates the benefits and costs of a policy scenario in which 31,810 hectares of Jersey's waters are closed to mobile gear fishing, in line with proposals contained in the Government of Jersey's draft Marine Spatial Plan. We estimate that the policy will lead to significant net benefits over a 20-year period as the ecosystems in the protected area recover, even after accounting for reduced fishing catch in the area and displacement of some of the fishing effort to other areas.

The cumulative net ecosystem services improvement arising from the policy is estimated at ~£5.7 million over the first 5-year period, ~£17.5 million over a 10-year period and ~£42.9million over a 20-year period. These figures refer to the cumulative value of the increase in ecosystem services in the protected area, minus the cumulative reduction in ecosystem services due to displacement of fishing activity into other areas.

This net impact assumes that 75% of the fishing effort is displaced elsewhere, offsetting some of the benefit in the protected area through reduced ecosystems services in the areas affected by this displaced effort. Before displacement, the gross ecosystem services benefits in the proposed protected area are much larger: these cumulative gross benefits are estimated at £17.5 million within the first five years, £54.0 million over a 10-year period and £132.0 million over twenty years.

When factoring the lost fishing value from these time periods, the cumulative net benefit of the marine park proposal over five, ten and twenty years is estimated as ~£1.6 million, ~£9.6 million and ~£27.8 million, respectively.

Due to the time lag for certain ecosystem service benefits to arise following a ban on mobile gear fishing, the proposed policy is estimated to constitute a net cost during each of the first two years (Year 1: -£473,000; Year 2: -£94,000) after considering lost fishing activity. This means that the cumulative impact of the policy is negative during the first three-year period. However, as the ecosystems services benefits rise steadily over time to outweigh these costs, the policy is estimated to become a cumulative net benefit from its fourth year onward and the size of this net benefit rises steadily thereafter. The model does not include an estimate of the costs of administering the policy.

For reference, if all Jersey's territorial waters were to implement a ban on mobile fishing gear, there would be a net cost for the first six years of implementation, however from year seven it becomes a cumulative net benefit of ~£4 million, with a cumulative net impact of ~£99 million over a 20-year period.



Annual net impact value

Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
-£472,971	-£94,479	£302,603	£717,664	£1,152,753	£1,487,254	£1,540,397	£1,595,085	£1,651,366	£1,709,288
Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20
£1,768,904	£1,830,266	£1,893,428	£1,873,304	£1,853,395	£1,833,697	£1,814,208	£1,794,927	£1,775,850	£1,756,977

Note: 'Annual net impact' is the net improvement in ecosystem services (the improvement within the protected area, minus the disimprovement caused by displaced fishing activity in other areas) minus the cost of reduced fishing catch within the protected area. The figures in this table refer to the annual net impact accruing during each individual calendar year.

Cumulative impact

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
Ecosystem benefit	£361,130	£1,097,528	£2,216,557	£3,741,971	£5,693,890	£7,971,815	£10,294,481	£12,663,521	£15,080,615	£17,547,494
Total costs	£834,100	£1,664,977	£2,481,404	£3,289,154	£4,088,319	£4,878,991	£5,661,259	£6,435,213	£7,200,942	£7,958,532
Net impact	-£472,971	-£567,450	-£264,847	£452,817	£1,605,571	£3,092,825	£4,633,222	£6,228,308	£7,879,673	£9,588,962
	Year 11	Year 12	Year 13	Year 14	Year 15	Year 16	Year 17	Year 18	Year 19	Year 20
Ecosystem benefit	£20,065,937	£22,637,776	£25,264,895	£27,864,093	£30,435,667	£32,979,910	£35,497,112	£37,987,562	£40,451,543	£42,889,337
Total costs	£8,708,071	£9,449,644	£10,183,335	£10,909,229	£11,627,408	£12,337,954	£13,040,948	£13,736,471	£14,424,601	£15,105,419
Net impact	£11,357,866	£13,188,132	£15,081,560	£16,954,864	£18,808,259	£20,641,956	£22,456,164	£24,251,091	£26,026,942	£27,783,918

Note: the figures in this table show cumulative totals for the sum of annual net impact (broken down into benefits, costs and net impact) as at the end of each calendar year.

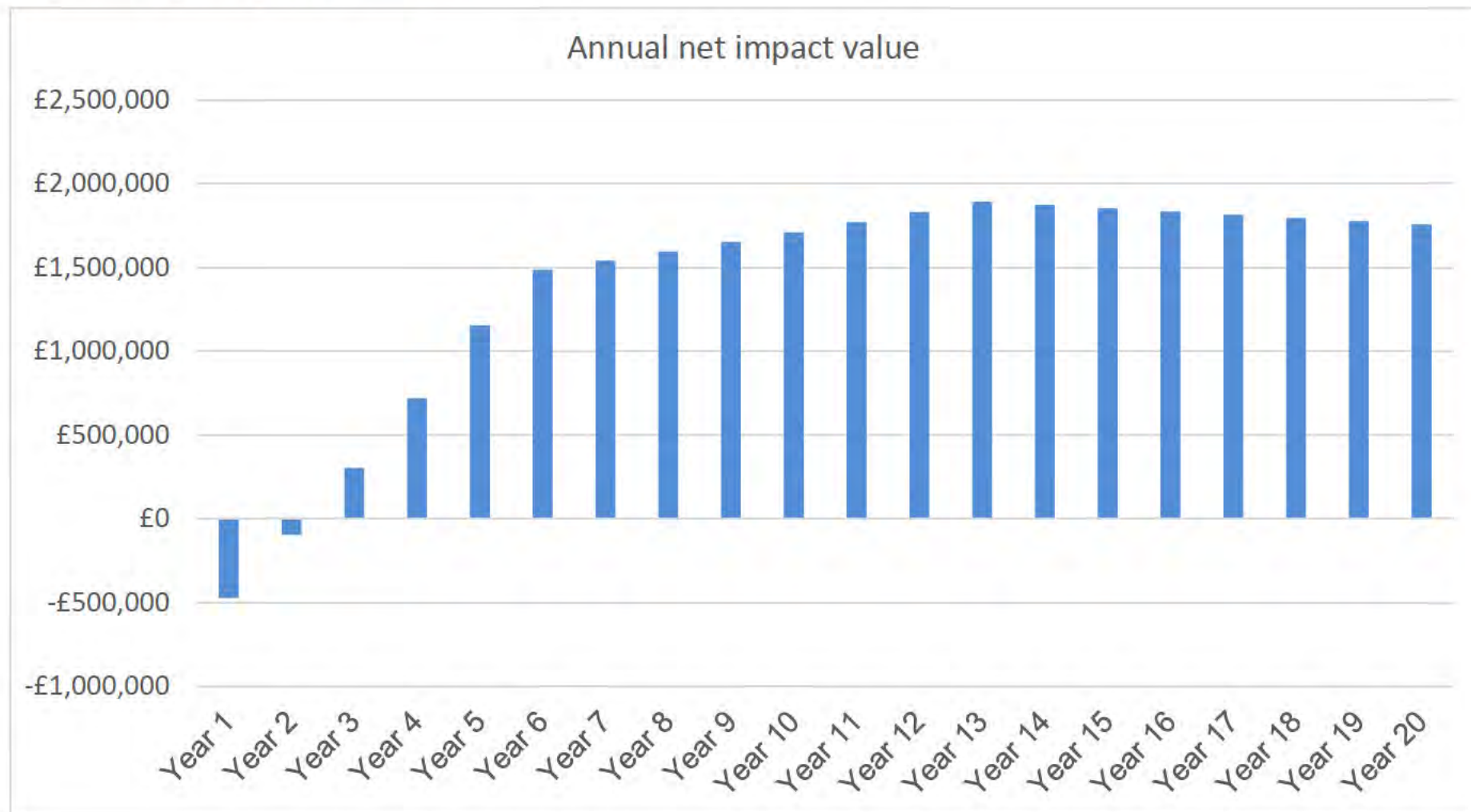


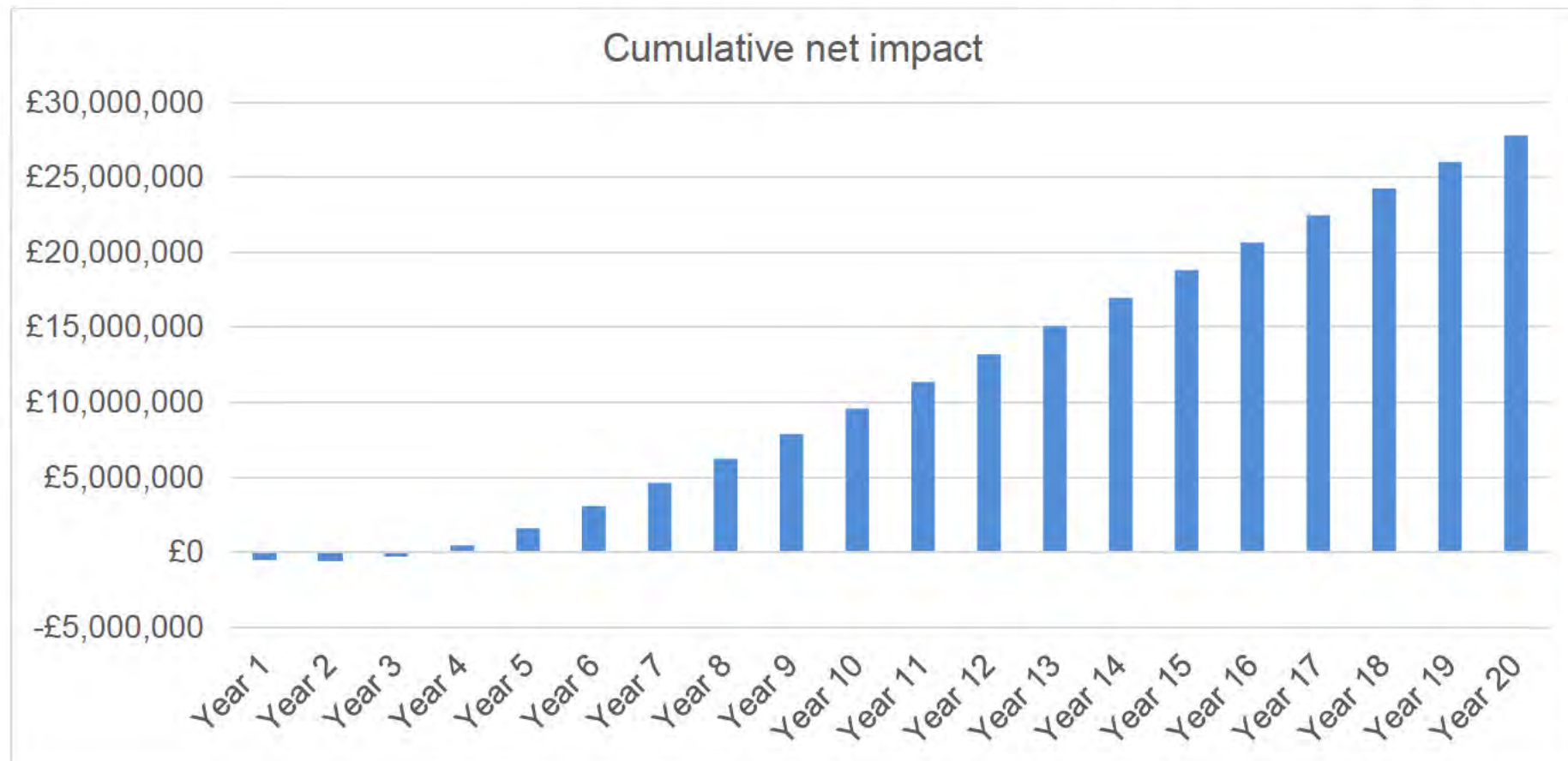
Benefit by ecosystem service in the protected area (gross, excluding displacement)

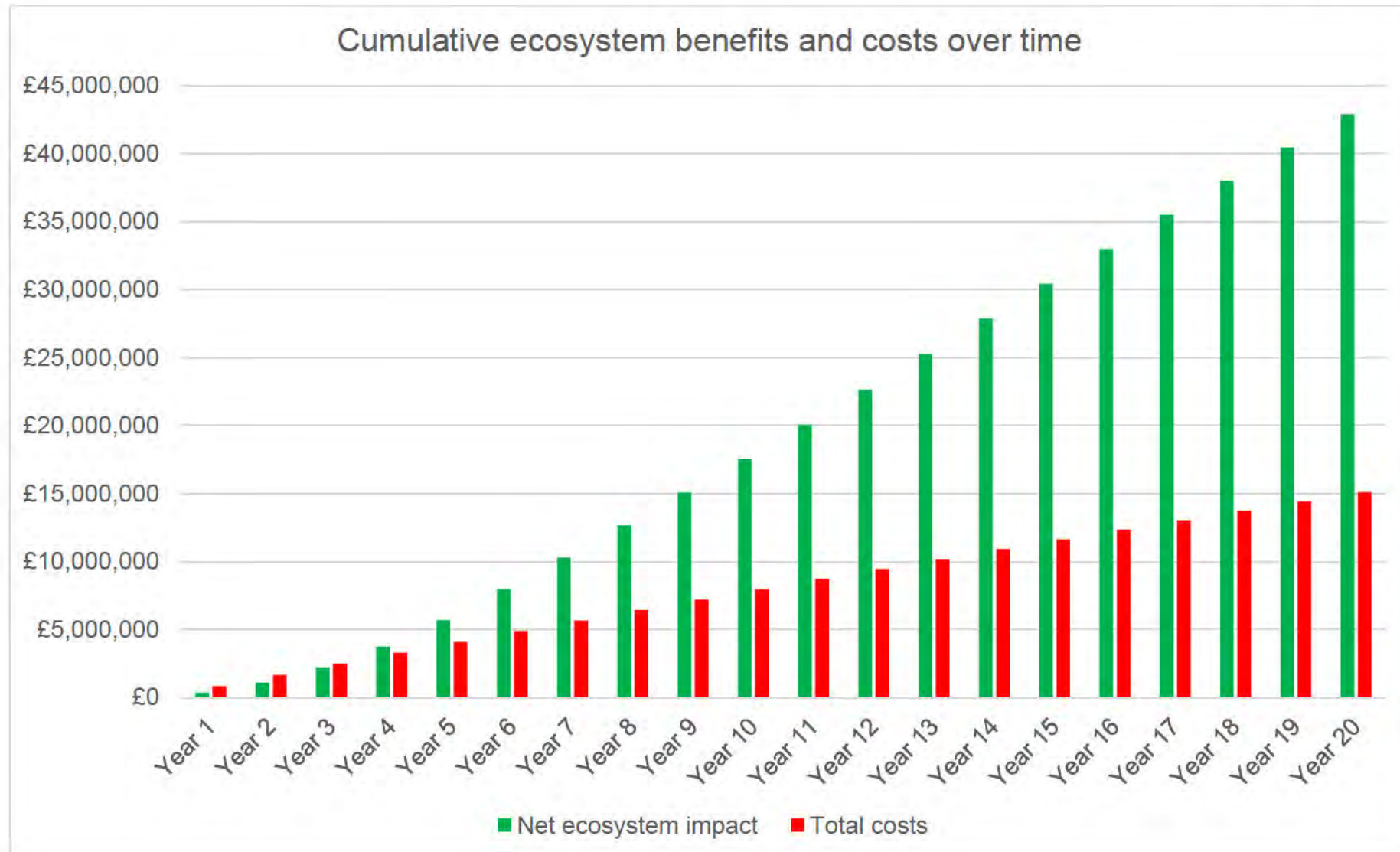
Ecosystem service type	Ecosystem service	1-year impact	5-year impact	10-year impact	20-year impact
Regulating	Resilience and resistance	£4,502	£72,499	£228,411	£566,364
Regulating	Biologically mediated habitat	£17,610	£283,598	£893,489	£2,215,480
Supporting	Nutrient recycling	£383,033	£6,168,649	£19,434,658	£48,189,834
Regulating	Gas and climate regulation	£111,631	£1,797,784	£5,664,014	£14,044,390
Supporting	Bioremediation of waste	£438,919	£7,068,678	£22,270,248	£55,220,914
Provisioning	Leisure and recreation	£151,522	£2,090,532	£5,409,547	£11,538,567
Provisioning	Food provision	£2,801	£30,936	£77,017	£162,113
Provisioning	Raw materials	£797	£5,255	£11,536	£23,135
Cultural	Cultural heritage and identity	£353	£1,731	£3,369	£6,395
All ecosystem services		£1,111,168	£17,519,661	£53,992,290	£131,967,191



Impact of policy over time







Contribution du CRPMEM de Normandie à la consultation publique sur le Jersey Marine Spatial Plan



IMSP

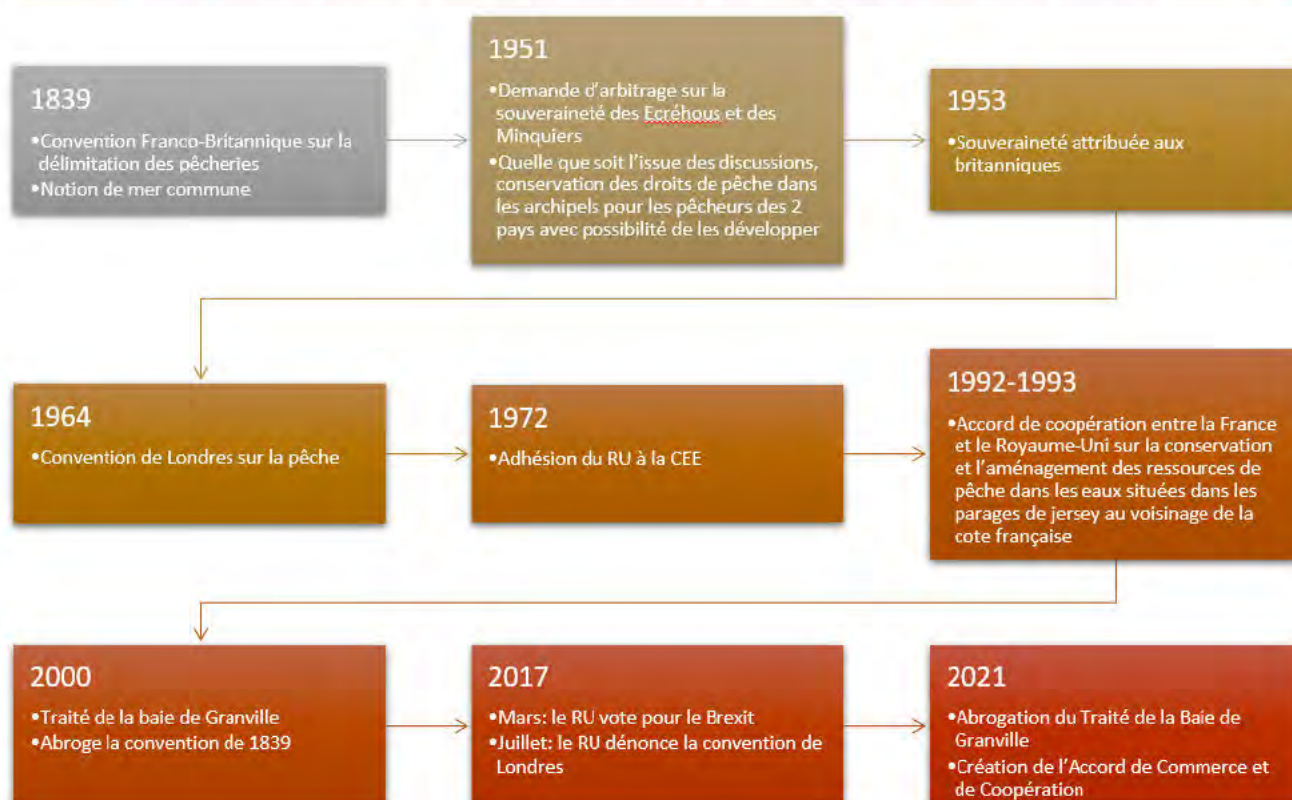
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1. INTRODUCTION

1.1. Pourquoi le CRPMEM de Normandie répond à cette consultation ?

HISTORIQUE DES RELATIONS ENTRE JERSEY, LE ROYAUME-UNI ET LA FRANCE



Le Jersey Marine Spatial Plan (JMSP) a pour but de réunir l'ensemble des enjeux présents dans les eaux de Jersey et de fournir un cadre pour organiser les ressources et les activités humaines et marines tout en permettant de développer un réseau d'Aires Marines Protégées (AMP).

Le CRPMEM de Normandie a été invité à y répondre par les autorités jersiaises et en tant que structure professionnelle ayant pour but de défendre les intérêts de tous les pêcheurs normands, nous souhaitons apporter notre contribution à ce document afin de rappeler l'importance des eaux jersiaises pour la pêche normande et appeler à sa juste considération.

1.2. Rappel des relations historiques entre Jersey et la Normandie

Jersey et la Normandie sont fortement liés par l'Histoire. Nous avons été séparés en 1204 lorsque la France a repris possession de la Normandie en oubliant les îles Anglo-normandes. Cependant, nos destinées ont toujours été liées. Les origines normandes sont d'ailleurs très marquées à Jersey.

De plus, nous pouvons facilement nous rendre compte de la proximité géographique qui se trouve entre les deux régions. Au plus proche, Jersey n'est qu'à 12.03 milles nautiques des côtes françaises, soit 22.2 km.

Cette proximité a d'ailleurs engendré des échanges entre pêcheurs depuis presque deux siècles. À ce titre, plusieurs accords ont déjà été signés, source de nombreux échanges. Le dernier en date était le Traité de la Baie de Granville qui avait notamment pour objectif de mettre en place des modalités de gestion commune concernant la pêche dans ce périmètre.

Dans le JMSP, il est mentionné que cet exercice de planification permettra à Jersey de remplir ses obligations internationales. Dans ce paragraphe, les obligations mentionnées concernent uniquement l'environnement dont notamment le principe 30x30. Nous tenons à rappeler que Jersey est également engagé à respecter les droits de pêche historiques et antérieurs au Brexit des navires français via un nouvel accord post-Brexit, le Trade and Cooperation Agreement (TCA). Dans ce cadre, Jersey est engagé à ce qu'il n'y ait pas de mesures discriminatoires et à assurer un maintien des activités telles qu'elles existaient avant le Brexit. Il nous semble donc primordial que la définition du réseau d'aires marines protégées se fasse en concertation avec la pêche française pour la prendre en considération.

1.3. Absence de prise en compte de la pêche normande dans la concertation

Le CRPMEM de Normandie constate que les activités de pêche normandes sont très peu prises en compte dans la définition du réseau d'aires marines proposé. De même, l'impact et les conséquences socio-économiques d'un tel réseau d'AMP sur les pêcheurs normands, sur le territoire normand, ne sont pas évoqués.

Comme cité dans le *MPA Assessment Methodology (Evidence Base document EB/NB/12)*, depuis le printemps 2023, 5 ateliers ont été organisés pour consulter les parties prenantes identifiées comme essentielles au déploiement du JMSP. Nous déplorons que la pêche normande et française, historiquement présente, n'ait été considérée comme une partie prenante importante. Nous sommes d'autant plus dans l'incompréhension que lors des ateliers de concertations, 100% (17/17) des avis sur la question "reconnaitre les zones de pêche commerciale traditionnelles au sein des AMP" sont favorables. Nous pensons donc que la pêche française, en tant qu'activité traditionnelle depuis des siècles dans les eaux de Jersey, est à considérer et qu'un temps d'échange aurait pu être organisé en 2023.

Nous aimerions également savoir ce que signifie concrètement la question "manage french fishing vessels better" dont 5/5 avis sont favorables alors que les navires français, dans les eaux de Jersey, sont ceux soumis à la réglementation la plus contraignante.

La pêche française représente plus de 50% de l'activité de pêche dans les eaux de Jersey. Le JMSP montre une volonté de prendre en compte l'ensemble des activités présentes, c'est pourquoi il nous semble important d'intégrer les représentants de la pêche française à l'ensemble de la démarche afin de trouver des solutions "gagnant-gagnant", permettant à la fin d'atteindre les objectifs environnementaux et de préserver les activités de pêche artisanales normandes.

2. Analyse des diagnostics environnementaux (Chapitre 8)

Dans le chapitre 8 (*the natural environment and biodiversity*) du document soumis à consultation, la variété des habitats existants dans les eaux de Jersey est présentée. Nous observons que les eaux de Jersey sont divisées en deux grandes parties : à l'Ouest des eaux relativement profondes avec des habitats présentant peu d'enjeux et à l'Est, des eaux peu profondes où les enjeux environnementaux sont très importants.

Nous remarquons tout d'abord que les zones de protection proposées chevauchent fortement les zones de pêche des navires normands alors que certains secteurs auraient moins d'impact pour leur activité, c'est le cas notamment pour les laminaires. Nous sommes surpris par la répartition des habitats et nous nous interrogeons sur les études qui ont permis la réalisation de cette carte d'habitats (p.95).

Ensuite, les documents de référence utilisés pour la rédaction de ce chapitre entraînent quelques interrogations. Nous notons tout d'abord que beaucoup ont été rédigés par l'ONG Blue Marine Foundation qui se décrit elle-même comme ayant pour objectif de restaurer les océans suite à de la surpêche, un des plus gros problèmes environnementaux du monde. La pêche artisanale normande, aux réglementations très strictes dans le sens d'une pêche durable et responsable, n'est aucunement dictée par des valeurs de surpêche.

De plus, nous avons des interrogations sur l'exactitude des données utilisées pour caractériser les habitats. Effectivement, le *MPA Assessment Methodology* révèle que les cartes d'habitats des années 1970 et 1980 ont été actualisées en 2019 mais avec des données de 2014. Basé sur des données qui ont plus de 40 ans, l'état de connaissances actualisé des habitats a toujours 10 années de retard.

Ces observations nous mènent à douter de la rigueur scientifique et de la neutralité des études utilisées pour construire ce document.

2.1. Remarques sur le diagnostic des Habitats marins

Trois habitats sont présentés comme étant d'enjeux majeur :

- Les herbiers de zostères
- Les forêts de laminaires
- Les bancs de maërl
-

Ces trois habitats sont listés dans l'Annexe V de la Convention OSPAR pour la zone Atlantique Nord-Est. Dans le *MPA Assessment Methodology* il est mentionné que minimum 30% de chaque habitat à protéger doit être représenté dans la totalité du réseau d'AMP et que c'est flexible selon l'état de conservation et la surface des habitats. Nous notons que 100% des herbiers de zostère, 89% des laminaires et 86,7% du maërl sont au sein du réseau d'AMP proposé.

Sans remettre en cause la nécessité de protéger les habitats, nous pensons qu'il est possible de remplir les objectifs environnementaux en redessinant les aires marines protégées afin de prendre en considération les enjeux socio-économiques de la pêche française.

2.2. Méthodologie Habitats

Jersey, comme la France, a pour objectif d'atteindre 30% de ses eaux en aires marines protégées (AMP) d'ici 2030. Afin d'atteindre cet objectif commun, il serait intéressant de maintenir une cohérence entre les méthodologies utilisées par Jersey et la France.

Pour information, les autorités françaises ont une méthodologie appelée l'Analyse Risque Pêche (ARP) qui ne repose pas sur un principe de précaution mais sur une caractérisation des interactions engins/habitats. Ainsi, des cartes de distribution des habitats d'intérêts communautaires sont croisées avec celles des activités de pêche (pour chaque engin/métiers).

Puis à partir de ces éléments, un risque de dégradation est quantifié, pour cela il est nécessaire d'acquérir des connaissances sur la sensibilité des habitats aux pressions physiques. Ce qui permet de réaliser un risque de dégradation des habitats pour chaque engin (1 carte par engin/métier).

La dernière étape de cette méthodologie est d'estimer le risque de porter atteinte aux objectifs de conservation. Ce risque est déterminé à partir de la combinaison du risque de dégradation de l'habitat, et de la prise en compte du niveau d'enjeu de l'habitat et de paramètres locaux écologiques/économiques (activités de pêche professionnelle)¹. À partir de ces éléments, on peut évaluer un niveau de dégradation : nul, moyen et fort. Selon le niveau, des propositions de mesures réglementaires sont émises et présentées aux professionnels de la pêche pour concertation.

Une meilleure compréhension des mesures prises sur les habitats aurait pu être obtenue en fournissant davantage d'éléments. Effectivement, dans les documents fournis pour cette consultation, il n'est jamais spécifié l'état de conservation des habitats. L'argument principal semble être le caractère extraordinaire que ces habitats peuvent présenter en termes de diversité. Il est évident qu'un suivi particulier doit être accordé à des habitats aussi remarquables.

Toutefois, mettre en place des mesures d'interdiction de manière préventives dans des zones importantes économiquement et ayant une forte dépendance spatiale pour les professionnels de la pêche peut soulever des interrogations. Principalement lorsque l'effort de pêche ainsi que l'impact réel des engins de pêche sur les différents habitats marins ne sont jamais quantifiés. L'existence de 10 ans de preuves photographiques pour la zone des Sauvages est mentionnée p.86, mais, il n'y a aucune référence à l'évolution des habitats. Il est probable qu'en 10 ans, des modifications du milieu auraient été aperçues si les engins utilisés dans cette zone dégradaient les habitats.

Les éléments dont nous disposons témoignent d'habitats en bon état de conservation dans des zones de pêche historiques. L'impact présumé de ces activités ne semble donc pas réducteur pour ces habitats.

Ainsi, il pourrait être intéressant de fournir un complément d'information sur l'état de conservation des habitats à protéger ainsi que de qualifier et quantifier l'impact réel des engins de pêche sur les fonds marins des eaux de Jersey.

¹ Paramètres locaux : état de conservation des habitats, effort de pêche, Taux de production/ dépendance des navires, caractéristiques locales des engins, réglementation déjà existante, autres éléments pertinents

2.3. Herbiers de zostères, un herbier en bon état

Dans les eaux de Jersey comme dans les eaux françaises, des herbiers de zostères sont présents.

Côté français il est majoritairement présent au sein de l'archipel de Chausey où l'état des surfaces de l'herbier est connu depuis un siècle, principalement par des suivis photographiques qui permettent d'avoir une cartographie très fine de cet habitat.

A Chausey, des suivis réguliers ont permis de constater que cet habitat est en constante progression depuis 1980 (Fournier, 2002, 2008, 2014, 2020² ; Godet et al., 2009³). En effet, de 164 hectares en 1982 (Godet et al., 2009)², l'herbier de Chausey couvre au moins 360 hectares en 2019 (Fournier, 2020).

De plus, plusieurs études prouvent que la régression de l'herbier avant les années 1980 était liée à la 'wasting disease' et non à cause d'une activité anthropique. Il faut d'ailleurs souligner que le redéveloppement de l'herbier de Chausey depuis 40 ans se fait en présence d'activités de pêche. L'évolution de l'herbier peut s'expliquer par différents facteurs notamment la dynamique naturelle de l'espèce qui est favorisée par la mise en place de concessions conchylicoles (Fournier, 2020) mais aussi des conditions climatiques favorables.

Un phénomène rare à l'échelle du littoral européen où la plupart des herbiers de zostères marines sont en déclin ou stables. La régression surfacique de certains herbiers peut être attribuée à plusieurs facteurs. Cet habitat est très sensible aux variations de température et à la qualité des eaux (Arias-Ortiz et al., 2018⁴ ; Ondiviela et al., 2014⁵)

Au cours des 20 dernières années, le Golfe normand breton n'a pas connu de période de froid intense, ce qui pourrait expliquer l'émergence et le développement des herbiers de zostères. Il faut également noter qu'il s'agit d'un habitat dont la résilience est forte du fait de la présence de rhizomes.

Dans l'archipel de Chausey, aucune mesure réglementaire de restriction des activités humaines n'est actuellement prise. Elles ne sont d'ailleurs pas justifiées étant donné que cet habitat n'est pas propice à la pratique des arts trainants. D'eux même, les pêcheurs ont mis en place des bonnes pratiques qui permettent de concilier les activités de pêche et l'amélioration de l'état de conservation des herbiers de zostères.

Ces faits montrent bien que ce type d'habitat est plus sensible aux aléas climatiques qu'aux activités de pêche.

2.4. Forêts de laminaires, un habitat résilient

Cet habitat a été rajouté en 2021 à la liste des habitats OSPAR⁶. Il est reconnu pour son rôle dans la captation de carbone mais n'est pas identifié comme étant un habitat menacé et/ou en déclin. D'après la liste OSPAR des espèces et habitats menacés et/ou en déclin⁷ et l'étude de 2021, les espèces *Laminaria spp.* (qui composent les forêts de laminaires des eaux de Jersey) ne sont pas identifiées « menacé ou en déclin » pour notre région OSPAR. Ainsi, il s'agit effectivement d'un habitat à fort intérêt écologique mais en aucun sens d'un habitat rare ou dont l'état de conservation est menacé.

² Jérôme Fournier, 2020, Suivi surfacique de l'herbier de *Zostera marina* de l'archipel de Chausey.

³ Laurent Godet, 2009, Recolonisation des herbiers à *Zostera marina* après la Wasting Disease" des années 1930.

⁴ Arias-Ortiz et al. 2018, A marine heatwave drives massive losses from the world's largest seagrass carbon stocks. DOI : [10.1038/s41558-018-0096-y](https://doi.org/10.1038/s41558-018-0096-y)

⁵ Ondiviela et al., 2014, The role of seagrasses in coastal protection in a changing climate. DOI: [10.1016/j.coastaleng.2013.11.005](https://doi.org/10.1016/j.coastaleng.2013.11.005)

⁶ de Bettignies T. et al (2021). Case Report for kelp forests habitat. OSPAR 787/2021, 39 pp. ISBN 978-1-913840-16-7

⁷ Liste OSPAR des espèces et habitats menacés et/ou en déclin, référence : 2008-6 - MNHN

La baie de Granville constitue un secteur de fort développement de ces espèces du fait de sa faible profondeur. Plusieurs espèces de laminaires sont considérées en déclin par la convention OSPAR. Cependant, le principal facteur identifié est le réchauffement climatique, en effet, les laminaires sont très sensibles au réchauffement de l'eau. Or les derniers hivers n'ont pas permis à l'eau de descendre suffisamment en température. Les impacts se font d'ailleurs ressentir sur d'autres espèces locales.

D'un point de vue biologique, cet habitat a la particularité de présenter une croissance rapide, ce qui lui permet de se régénérer facilement s'il se trouve endommagé. Ces algues poussent sur des fonds durs impropres à la pratique des arts traînants (roches).

C'est d'ailleurs grâce à cette stratégie qu'il a pu se développer dans le golfe Normand-Breton. En effet, la région est exposée à la houle, notamment lors des tempêtes. Ces dernières ont de fortes conséquences sur les forêts de laminaires qui se trouvent arrachées, le fait de les retrouver échouées en masse sur les plages en est un bon témoin. Par ailleurs, leur capacité à pouvoir se régénérer facilement leur permet de se redévelopper rapidement.

Il est important de tenir compte des différents paramètres ayant un impact sur les laminaires avant de prendre des mesures très restrictives sur la pêche. Cette dernière n'est pas une variable d'ajustement. Il serait donc important de commencer par réaliser un inventaire des espèces présentes et des raisons qui entraînent leur déclin s'il existe de manière observable et objective afin de prendre des mesures adaptées.

2.5. Bancs de maërl, un habitat non menacé

Cet habitat est présent dans toutes les régions OSPAR⁸. Toutefois, il est identifié comme étant menacé et/ou en déclin uniquement dans la région OSPAR III (mers celtiques). Le golfe normano-breton, donc Jersey, se trouve en région OSPAR II (mer du Nord au sens large). L'état de conservation des bancs de maërl de Jersey n'est donc pas menacé. Cet habitat est donc à considérer de manière différente des autres habitats OPSAR.

Il serait sans doute intéressant de réaliser des études complémentaires visant à caractériser plus précisément l'état de conservation du maërl. Par ailleurs, cet habitat est déjà protégé au niveau du site RAMSAR des Ecréhous.

2.6. Remarques sur la « No Take Zone » du récif des Sauvages.

Le récif des Sauvages est identifié comme étant très riche. Plusieurs suivis scientifiques y ont été menés, permettant d'observer la présence de coraux d'eau froide tels que les gorgones (*Eunicella verrucosa*). Leur croissance est lente, ce qui les rend plus vulnérables à l'abrasion. C'est une espèce d'eau froide présente à Jersey dans sa limite basse de son aire de répartition géographique. Le principal facteur de risque pour cette espèce est donc le réchauffement climatique.

Le reste du document nous laisse à penser que ces espèces sont également présentes dans de nombreux autres secteurs des eaux jersiaises. De plus, elles ne font l'objet d'aucun classement de conventions internationales.

⁸ Liste OSPAR des espèces et habitats menacés et/ou en déclin, référence : 2008-6 - MNHN

Une incohérence des enjeux de protection

Nous notons que le document présente un type d'habitat spécifique à la présence de gorgone, il s'agit des fonds durs stables. Le secteur où la présence de gorgone est identifiée sur cet habitat est le sud-ouest des eaux de Jersey. D'après la carte présentée, il s'agit clairement du site identifié comme étant idéal pour l'implantation d'un parc éolien. Cela fait réellement s'interroger sur l'intérêt réel de protéger les gorgones dans un site comme Les Sauvages, ce qui aurait un impact avéré sur la pêche normande alors qu'il serait possible de condamner une large zone où cette espèce est présente.

Absence de neutralité de l'auteur en charge du diagnostic

Dans les documents source, nous avons trouvé un rapport publié par l'ONG Blue Marine Foundation de septembre 2023 intitulé "A baseline description of the benthic assemblages of Les Sauvages reef, Jersey" (*Evidence Document EB/NB/11*). Tout d'abord, l'auteur, Blue Marine Foundation ne nous semble pas être un organisme scientifique dans le sens où il n'est pas neutre mais clairement orienté contre la pêche. Par ailleurs, dans ce document, les données source semblent provenir de sorties d'observation organisées via l'administration jersiaise. Enfin, le fait d'avoir écrit ce rapport en septembre 2023 nous fait nous interroger : est-ce une source sur laquelle s'est basée le JMSP, si tard dans le calendrier ou est-ce l'inverse ?

Les espèces identifiées sont effectivement des espèces intéressantes mais restent communes en baie de Granville.

Ce site semble également identifié comme d'importance phylogénétique du fait de la présence de brachiopodes (*Argyrotheca cistella*). Quelles sont les connaissances sur cette espèce ? En nous renseignant, nous nous sommes rendu compte qu'elle avait également été observée dans le secteur d'Herm. Par ailleurs, étant donné les caractéristiques de cette espèce, peut-elle être vraiment impactée par des engins de pêche ?

Le rapport évoque également l'activité de pêche présente sur le site. Nous ne comprenons pas bien comment ces données ont été obtenues. Pourquoi seulement la pêche des coquilles Saint-Jacques est identifiée et présentée comme seule activité sur la zone ? Il y a également d'autres activités de pêche non négligeables comme la pêche du bulot et des crustacés qui ne figurent pas dans ce diagnostic.

Une pêche respectueuse des habitats et sans impact

Ce secteur est une zone de pêche importante que ce soit pour les caseyeurs ou pour les chalutiers-dragueurs. Concernant les navires traînants, ils n'ont aucun intérêt à passer sur le récif, ils le contournent : actuellement les appareils de navigation sont devenus suffisamment précis pour éviter le récif tout en travaillant à proximité. Cela explique vraisemblablement que ces espèces soient présentes et puissent se développer.

➔ Nous ne pouvons donc pas cautionner la mise en place de cette No Take Zone :

- Juste sur la base des éléments fournis. Pour justifier de telles mesures, il est impératif de se baser sur des études scientifiques, neutres et sans parti pris.
- Avec des données d'activité de pêche erronées ou incomplètes.

➔ Nous nous opposons à la mise en place d'une NTZ basée sur des éléments si faibles dans une zone présentant de tels enjeux pour la pêche normande.

2.7. L'exclusion systématique des arts traînants sans preuves concrètes

Nous souhaitons également souligner le fait que les mesures proposées sur le réseau d'aires marines protégées identifié se basent essentiellement sur des principes de précaution et non sur des preuves scientifiques acquises localement.

En effet, une récente étude publiée en 2022 par l'IFREMER consistait à étudier l'impact des arts traînants sur les fonds marins en Manche. Il s'agit de l'étude IPREM motivée et portée par les professionnels de la pêche normande. Cette étude a démontré que l'intensité de pêche des navires français dans les eaux de Jersey est faible. De plus, le rapport IPREM dévoile que l'impact potentiel des arts traînants sur les fonds marins dans les eaux de Jersey est très faible voire nul (figure 1).

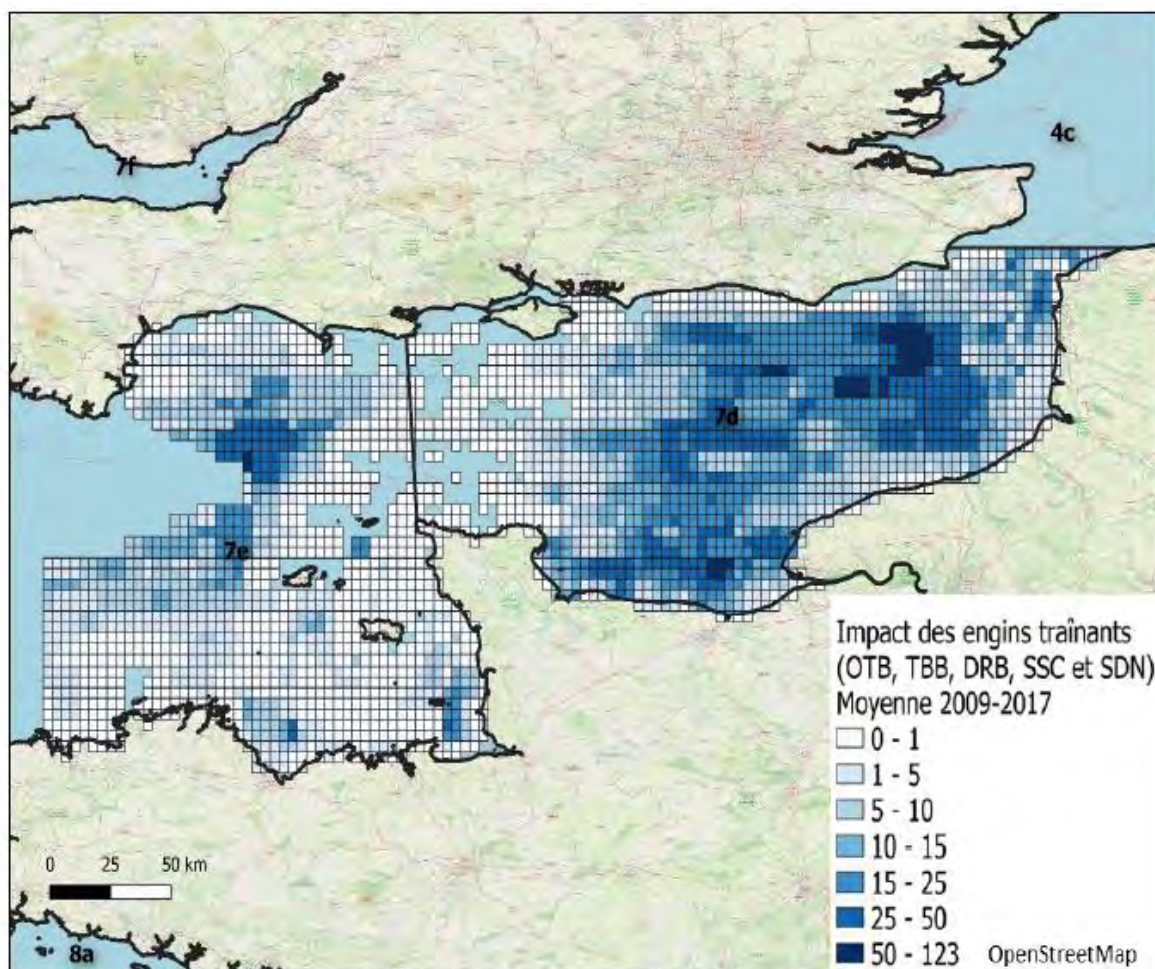


Figure 30 : Impact cumulé des engins de pêche traînant considérant les risques pour les différents habitats et l'intensité de pêche moyenne (= effort moyen) entre 2009-2017 pour tous les navires européens en zones VIIe et VIId, sur une grille de résolution spatiale de 0.05° x 0.05°. L'impact cumulé (= \sum Indice d'impact [engin]) est calculé pour un habitat donné en multipliant le coefficient de risque (R) de l'habitat considéré par l'intensité de pêche moyenne (SAR.an⁻¹) puis sommé pour tous les engins.

Figure 1 : Impact cumulé potentiel des engins de pêche traînants sur les différents habitats pour les navires européens en VIIe et VIId entre 2009 et 2017 (figure 30 du rapport)

Bien que l'impact d'un engin dépende de facteurs intrinsèques aux activités de pêche (surface exploitée, pénétration dans le sédiment...), il faut rappeler que cet impact dépend également de facteurs environnementaux comme la nature des fonds où la sensibilité des communautés benthiques à différents facteurs. Or, le projet IPREM a démontré que la sensibilité des habitats benthiques et donc l'impact réel d'un engin reste encore inconnu en Manche. Côté français comme côté jersiais, il y a donc un manque de connaissances sur ce sujet. Enfin, IPREM indique qu'en Manche, les communautés de fond sont à la fois résistantes à l'effort de pêche et aux conditions environnementales difficiles et que la résistance à ces deux facteurs est liée. Il y a donc un réel besoin d'études complémentaires pour discerner des effets qui seraient liés à l'environnement ou à la pêche ainsi que pour définir l'impact réel que pourraient avoir les différents engins sur les différents types d'habitats.

Il est donc nécessaire que les zones de protection proposées se basent sur des preuves scientifiques locales mettant en relation l'état de conservation des habitats avec des sources et des niveaux de pressions qui seraient identifiées, avérés et quantifiés.

Exemple d'une concertation réussie conciliant pêche et enjeux environnementaux : Méthode de mise en place des sites Ramsar dans le cadre des accords de la baie de Granville

En 2014, Jersey a proposé la mise en place de sites de protection des habitats pour le maërl et les herbiers de zostères. Il s'agissait alors de la première démarche environnementale dans le cadre de la Baie de Granville.

Ce sujet a été à l'origine de nombreux débats afin de répondre à l'ensemble des enjeux : protéger des habitats dont l'intérêt écologique est avéré tout en permettant le maintien des activités. Les différentes étapes sont présentées sur le tableau ci-dessous :

Février 2014	1ère approche Identification du besoin de concertation
Juin 2014	Consensus sur le besoin de protéger les habitats Demande de cartes transmises par Jersey en juillet 2014
Octobre 2014	Demande de précisions sur les enjeux liés à ces habitats par la France
Février 2015	Rapport présentant les enjeux pour l'activité des navires français Proposition de nouvelles limites
Juin 2015	La Société Jersiaise est mandatée pour réaliser une étude afin d'identifier les zones à enjeux
Octobre 2015	Echanges sur les périmètres des futurs sites
Février 2016	Accord sur le périmètre du site des Minquiers La Normandie émet des réserves sur celui des Ecréhous Demande du retour du rapport de la Société Jersiaise pour pouvoir trancher
Juillet 2016	Publication du rapport de la Société Jersiaise Jersey propose d'étendre le périmètre dans le secteur des Ecréhous pour protéger le maërl Proposition de mise en place d'un système de jachère
Août 2016	Le JFA s'oppose au système de jachère et demande une interdiction définitive des arts traînants dans ce secteur
Février 2017	Accord sur le périmètre de la zone La Normandie demande une interdiction de pêche de la coquille Saint-Jacques (drague et plongée)
Septembre 2017	Publication de l'arrêté jersiais avec interdiction du chalut et de la drague sur le périmètre

Par cet exemple, nous visualisons que les échanges ont duré 3 ans mais ont permis d'aboutir à un compromis.

Par ailleurs, ce travail a favorisé l'acceptation d'un tel projet pour les professionnels.
Cette méthodologie doit servir d'exemple pour les projets à venir.

3. Analyse du diagnostic sur la pêche professionnelle (Chapitre 9)

Dans cette partie, le CRPMEM de Normandie regrette tout d'abord que seuls les pêcheurs de Jersey soit considérés lorsque le JMSP cite pour objectif de garantir de pouvoir continuer à gagner sa vie de manière viable en tant que pêcheur. A titre d'exemple, avec ce projet d'AMP actuel, le navire normand LE STYX perdrait 100% de son activité, car il travaille uniquement dans les eaux de Jersey et dans des zones qui pourraient devenir des AMP.

De plus, nous regrettons qu'il n'y ait aucun document de référence officiel à propos de la pêche française. Nous regrettons fortement que seulement 2 lignes dans le JMSP suffisent à décrire la pêche française, pourtant si importante et dépendante des eaux de Jersey.

- "Today there are [...] 137 French Vessels." (P.130)
- "Jersey's waters are also fished by French fishers under the terms of a post-Brexit fishing agreement with the EU." (P.130)

Ensuite, nous constatons que le JMSP présente une méthodologie très confuse qui ne permet pas de savoir comment l'activité des navires français a été traitée. La méthodologie employée est à peine décrite, les activités de pêche cartographiées se résument à des présences/absences de navires.

Par ailleurs, ce n'est que dans le *Maritime Activity Assessment (EB/G/22)* que l'utilisation des données VMS pour les navires français est précisée.

Bien que le *Maritime Activity Assessment* présente une esquisse d'analyse des activités de pêche française, **une analyse plus poussée aurait été nécessaire étant donné les enjeux économiques qui y sont associés.**

De plus, dans le *MPA Assessment Methodology*, le Ministre de l'environnement indique que le développement du réseau d'aires marines protégées sera conforme aux objectifs environnementaux, économiques et sociaux globaux". Le terme "global" nous laisse penser que la pêche française est à considérer dans le développement du JMSP. Dès lors, et dans le cadre du TCA, il est nécessaire de considérer la pêche française comme un enjeu économique à part entière. Le terme "global" nous laisse également penser que les objectifs environnementaux et les enjeux pour la pêche française seront harmonisés avec les politiques environnementales françaises qui bordent les eaux de Jersey.

3.1. Tendances actuelles de la pêche

Le chapitre 9.3.1 (*Current fishing trend*) donne les données de production au travers les volumes débarqués des principales espèces halieutiques. Premièrement, non regrettons que cette partie dédiée aux débarquements et aux stocks ne se réfère qu'aux données de débarquements et qu'aucune évaluation de stocks ne soit présentée.

Ensuite, nous constatons que les données présentées ne correspondent pas à celles compilées par le CRPMEM de Normandie issues d'organismes scientifiques (Ifremer, SMEL).

En effet, nous observons des tendances différentes sur quelques espèces. C'est le cas pour le homard, où les résultats sont estimés comme bons côté français (figure 2). C'est aussi le cas pour la coquille Saint-Jacques où les résultats des différentes prospections montrent un stock et des débarquements (figure 3) en constante progression.

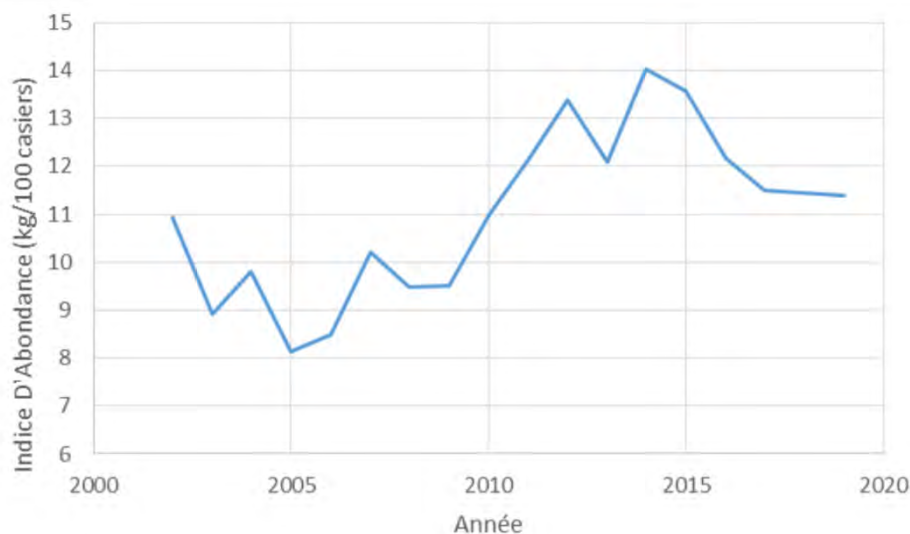


Figure 2 : Evolution des indices d'abondance du homard pour le stock "Homard 7e8a"

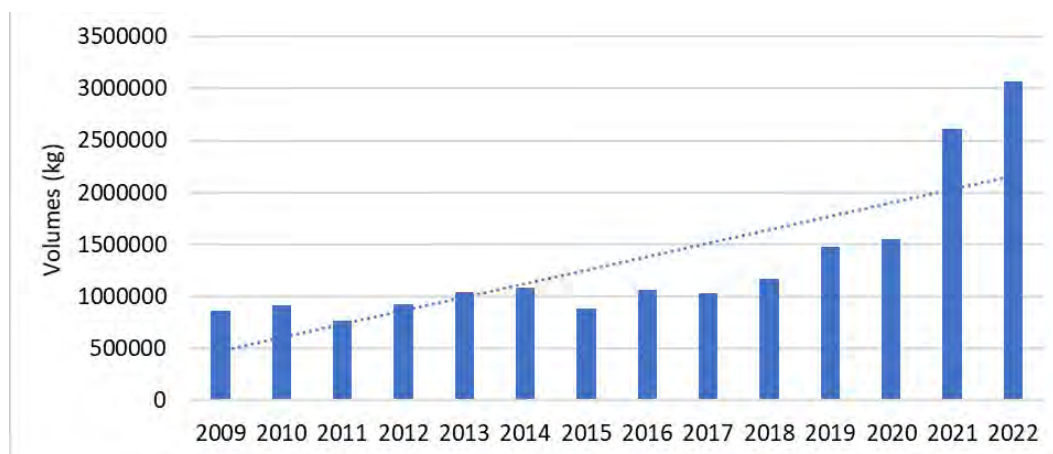


Figure 3 : évolution des débarquements de coquille Saint-Jacques pêchées en Manche Ouest et débarquées à Granville – Cherbourg – Saint Malo en fonction des années

Les espèces marines ne connaissent pas de frontières, nous travaillons donc sur les mêmes stocks. De ce fait, comme démontré par Nicolle et coll. (2017)⁹, les stocks des différents gisements de coquille Saint-Jacques du golfe normano-breton sont interconnectés et dépendant les uns des autres pour former un seul et même stock. Dans cette étude, il a été démontré que le recrutement et donc le stock local de coquille Saint-Jacques du sud-est de Jersey dépend largement des stocks locaux de Saint-Malo et de Chausey. Ainsi, les mesures de gestion autrefois applicables dans les eaux de Jersey, mais également l'ensemencement effectué depuis 2009 contribuent fortement à la qualité du stock dans les eaux de Jersey. Il nous paraît donc d'autant plus étrange d'avoir des tendances contradictoires.

Nous avons un réel intérêt commun à assurer une gestion durable des stocks halieutiques en Baie de Granville, ce qui implique la mise en place d'un travail cohérent entre la Normandie, Jersey et la Bretagne et cela de façon concertée.

⁹ Nicolle Amandine, Moitie Roderic, Ogor Julien, Dumas Franck, Foveau Aurelie, Foucher Eric, Thiebaut Eric (2017). Modelling larval dispersal of *Pecten maximus* in the English Channel: a tool for the spatial management of the stocks. *Ices Journal Of Marine Science*, 74(6), 1812-1825. <https://archimer.ifremer.fr/doc/00363/47375/>

3.2. Données exploitées et cartographie de l'activité de pêche

Dans le chapitre 9.3.2 (*Current spatial fishing patterns*) sur la spatialisation actuelle des activités de pêche, la description des activités de pêche est très succincte. De la manière dont est rédigée cette courte partie, cela laisse comprendre que les activités cartographiées sont celles issues des données AIS, des données de contrôle et des données déclaratives uniquement pour les navires de Jersey.

A défaut d'une présentation complète des activités de pêche française dans le JMSP, nous avons consulté les documents sources sur lesquels se base le JMSP, le *MPA Assessment Methodology* et le *Maritime Activity Assessment* ; Nous avons constaté que les activités de pêche française sont partiellement décrites. Nous souhaitons vous apporter nos remarques.

Pourquoi ne pas avoir présenté plus précisément dans le JMSP la méthodologie employée et les données utilisées, notamment sur les activités de pêche françaises qui sont mutualisées aux activités des navires jersiais ? De plus, pourquoi faire une analyse des activités de la pêche française sans concerter les services français concernés afin qu'elle soit la plus représentative possible ?

Pourquoi l'étude d'impact du réseau d'AMP sur les navires de pêche n'a pas été reprise et présentée dans le JMSP ?

Une cartographie incomplète – Analyse de la description des activités de pêche française des documents de référence :

Dans le *Maritime Activity Assessment*, une analyse des activités de pêche française est faite. Nous observons que les données utilisées ont été les données VMS sur une année, du 1 juillet 2022 (entrée en vigueur de l'obligation de VMS au quart d'heure dans les eaux de Jersey pour tous les navires français) jusqu'au 30 juin 2023. Comme cela est cité dans le document, une année de données est totalement insuffisante pour réaliser une analyse juste et précise des activités de pêche sachant que l'activité des pêcheurs français comporte de la variabilité interannuelle, non prise en compte ici.

De plus, à cette période et dans le cadre des discussions post-Brexit liées au TCA, nous étions en pleine période de négociations sur la définition de la Nature et l'Ampleur de l'activité. Les conditions de pêche dans les eaux de Jersey étaient donc extrêmement floues. La réglementation était fluctuante puisque la réglementation française avait été maintenue le temps des négociations. Ce n'est que le 1er février 2023 que les conditions de pêche de Jersey ont été publiées et qu'à partir du 27 juin 2023 (publication d'un arrêté ministériel¹⁰) qu'elles ont été pleinement appliquées. Les professionnels étaient donc désorientés, en pleine adaptation et précautionneux face à tous ces changements rapides.

Pour rappel, le TCA se base sur 3 années complètes, antérieures au Brexit, comprises entre 2017 et 2020. Cela permet de prendre en compte l'ensemble des activités ainsi que la variabilité interannuelle.

Par conséquent, cette période (01/07/2022 – 30/06/2023) n'est absolument pas une année de référence en ce qui concerne l'activité des navires français dans les eaux jersiaises.

De plus, il est cité que dans 75% des cas, les données VMS ont pu être reliées aux données déclaratives du journal de bord pour identifier le métier pratiqué. Pour les 25% des cas restants, les données VMS ont pu être reliées soit à un engin dormant soit à un engin trainant mais selon quelle méthode ?

¹⁰ Arrêté du 27 juin 2023 modifiant l'arrêté du 25 février 2021 relatif aux mesures techniques et de gestion transitoires pour l'exercice de la pêche professionnelle dans les eaux de Jersey

Ensuite, dans le document source, il semble qu'un trait de pêche est identifié à partir du moment où un navire évolue à une vitesse non nulle inférieure à 6 nœuds. C'est effectivement la méthode qui est généralement utilisée. Cependant cette dernière a été mise en place pour les arts traînants, navires initialement équipés de VMS. La spécificité de la baie de Granville, c'est le fait qu'une flottille de petite pêche, principalement aux arts dormants se trouve à travailler dans les eaux d'un pays tiers. Les arts dormants ne travaillent pas de la même manière : ils virent à une vitesse nulle et filent généralement entre 5 et 7 nœuds, la méthode utilisée n'est donc pas représentative pour les arts dormants.

De plus, il est vrai que la France a rendu la VMS obligatoire en juillet 2022, cependant, étant donné le contexte complexe du moment, beaucoup de navires ont mis du temps à s'équiper. Il est donc vraisemblable que ces données ne soient pas représentatives de l'ensemble de la flotte.

Ensuite, l'utilisation de la VMS comme seule source de données pose sérieusement question.

Pour caractériser les activités de pêche des navires de Jersey, toutes les données disponibles ont été utilisées en cherchant à utiliser les données VMS, iVMS, AIS puis les enquêtes FISHMAP menées par Jersey. Ces enquêtes FISHMAP reprennent d'ailleurs la méthodologie française d'enquêtes VALPENA. De plus, les données FISHMAP 2017 étant trop antérieures, les pêcheurs jersiais ont pu demander lors d'une consultation en mars 2023 d'actualiser ces données. De nouvelles enquêtes ont alors été menées pour caractériser les activités de pêche sur 4 années, de 2018 à 2022. Ainsi, sur 5 années d'enquêtes entre 2017 et 2022, la meilleure année pour les navires de Jersey a été retenue.

En tant que CRPMEM de Normandie, partenaire du réseau VALPENA, nous sommes dans l'incompréhension. Pourquoi d'autres sources de données plus complètes n'ont pas été recherchées pour caractériser les activités de pêche française ? Pourquoi ne pas solliciter les CRPMEM et utiliser des données semblables que sont les données VALPENA pour les navires français alors que la collaboration semblait acquise pendant les 20 années du Traité de la Baie de Granville ? Pourquoi ne pas chercher à identifier les activités de pêche sur plusieurs années et retenir la meilleure année ?

Pour pouvoir se baser sur des éléments objectifs, il est nécessaire que le JMSP adopte une méthodologie semblable pour la flotte jersiaise comme pour la flotte française en mobilisant les meilleures données disponibles.

Une nouvelle fois, nous jugeons les données utilisées pour les navires français non représentatives et incomplètes. L'exploitation de certains secteurs a donc été considérablement sous-estimée, comme pour le récif des Sauvages.

C'est pourquoi, AVANT la finalisation du JMSP, il nous semble primordial qu'une étude des activités de pêche des navires français soit menée conjointement avec les structures de la pêche professionnelle française.

Méthode d'analyse des données spatiales impertinente

Concernant l'analyse d'impact du projet de réseau d'AMP sur les activités de pêche, nous ne comprenons pas pourquoi elle n'a pas été présentée dans le JMSP d'autant plus que la pêche française représente une grande part, voir la totalité pour certains métiers, des activités de pêche cartographiées. Par ailleurs, nous ne comprenons pas la méthodologie employée pour identifier l'impact du potentiel réseau d'aires marines protégées sur la pêche française dans le *MPA Assessment Methodology*. Dans ce dernier document, cette analyse se base sur des jours attribuables aux arts trainants et aux arts dormants pour identifier leur activité au sein des différentes aires marines protégées proposées. Nous

ne comprenons pas la logique de jours attribuables pour les arts dormants. Dans le cadre du TCA, des jours de pêche ont été attribués uniquement aux arts traînants et non aux arts dormants.

Ensuite, Jersey reconnaît que les AMP entraînent un report des zones de pêche existantes vers d'autres zones. Les problématiques environnementales se trouvent alors déplacées sur d'autres zones, ce qui est contreproductif. Jersey préconise donc que l'impact des AMP sur les navires de pêche soit documenté pour éviter ce problème. Nous identifions également un risque de report d'activité qui pourrait fortement détériorer les zones adjacentes ce qui est dommage étant donné que l'impact global reste modéré et que les habitats sont en bon état.

Le *MPA Assessment Methodology* indique également comme objectif que le réseau d'AMP doit minimiser l'impact sur l'économie de la pêche et qu'il est recommandé de réaliser une évaluation, navire par navire, des conséquences des aires marines protégées une fois le JMSP finalisé et publié. L'analyse des conséquences socio-économiques est indispensable mais doit intervenir pendant le processus de consultation et de mise en place d'aires marines protégées.

Quel est le but de cette démarche à posteriori ? Est-il prévu en fonction des résultats de l'étude d'impact sur les activités de pêche une remise en cause des zones du JMSP validé ?

Quel est l'intérêt d'une approche individuelle sur des flottilles ?

Comment minimiser l'impact sur l'économie alors que les zones proposées à l'interdiction sont calquées sur les zones de fréquentation des navires de pêche normands ?

Pourquoi faire intervenir cette étude d'incidence qu'après finalisation du JMSP et non avant ?

Nous demandons à ce que cette étude des conséquences socio-économiques sur les navires de pêche français soit réalisée AVANT la finalisation du JMSP et en collaboration avec les structures professionnelles françaises.

3.3. Contre-analyse de l'activité de pêche des navires normands

Au regard de la faiblesse du diagnostic des activités de pêches normandes, il est primordial que les éléments que nous apportons ci-dessous le complètent et que leur intégration fasse l'objet d'un échange entre nous.

Une pêche normande très règlementée répondant aux enjeux de gestion durable

Les navires de pêche normands travaillent dans les eaux de Jersey depuis des siècles et encore actuellement. Aujourd'hui, les principales activités sont divisées en deux types de métiers :

- Les arts dormants : casiers à crustacés, casiers à bulot, filets et métiers de l'hameçon
- Les arts traînants : dragues à coquille Saint-Jacques, drague à praire et amande de mer, drague à bivalves, chalut de fond, chalut à perche, chalut pélagique, chalut en bœuf

Selon les métiers pratiqués, les stratégies de pêche de chaque navire diffèrent plus ou moins en fonction de la réglementation, de la saisonnalité, de l'espèce pêchée et de sa disponibilité, de la distance au port.

Cette variété de métiers et de pratiques permet de créer un équilibre compatible avec la durabilité des stocks, ce qui implique également une préservation des habitats dont les fonctionnalités pour les espèces halieutiques ne sont plus à démontrer.

De plus, la réglementation des pêches normandes est parmi les plus strictes et permet de soutenir voire améliorer l'état des stocks. En prenant l'exemple de la coquille Saint-Jacques, les contraintes que s'imposent les professionnels impliquent des temps de pêche plus courts ce qui contribue pleinement à réduire l'impact des arts trainants sur les fonds marins dans un esprit de pêche responsable et durable.

Une spatialisation de la donnée VALPENA des pêcheurs normands sur zone

Méthodologie Valpena : Dans leur mission de défense des intérêts des pêcheurs professionnels, les comités des pêches ont besoin de disposer de connaissances des activités de leurs navires à une échelle cohérente avec celle des projets de nouvelles activités en mer, les comités des pêches ont mis en place un outil de spatialisation de ces activités. VALPENA pour éVALuation des activités de PEche au regard des Nouvelles Activités a ainsi pour origine une volonté commune des comités des pêches d'apporter une donnée géographique normalisée et des éléments quantifiés selon une méthode scientifiquement établie permettant de caractériser l'activité des navires de pêche professionnelle à une échelle spatio-temporelle fine (maillage d'environ 3 milles nautiques de côté). La démarche scientifique sous-tendant l'ensemble de la méthodologie VALPENA s'appuie sur l'activité du Groupement d'Intérêt Scientifique (GIS) VALPENA et du laboratoire Géolittomer de l'UMR-LETG de Nantes, garants de l'intégrité des protocoles d'enquêtes et des modalités d'exploitation des données produites.

Les données VALPENA sont collectées par enquêtes individuelles directes auprès des pêcheurs pour l'année n-1 (dernière année complète). Chaque pêcheur déclare l'activité de son ou ses navires par mois, par engin et par espèce cible à l'échelle d'un maillage d'environ 3 milles nautiques de côté.

Les données utilisées dans ce rapport sont issues des données VALPENA issues des enquêtes pour l'année d'activité 2020. Le temps alloué pour réaliser ce retour ne nous a malheureusement pas permis de réaliser une évaluation pluriannuelle qui serait pourtant nécessaire.

De manière générale, les eaux de Jersey sont fréquentées toute l'année par les navires normands (figure 4). La figure 5 présente quant à elle l'indice d'intensité, soit le nombre de mois total travaillés par mailles. On peut alors observer que les navires normands travaillent principalement dans la partie Est des eaux de Jersey, à proximité de notre frontière. On observe également qu'une partie importante des futurs aires marines protégées jersiaises se trouve dans des secteurs très fréquentés par les navires normands.

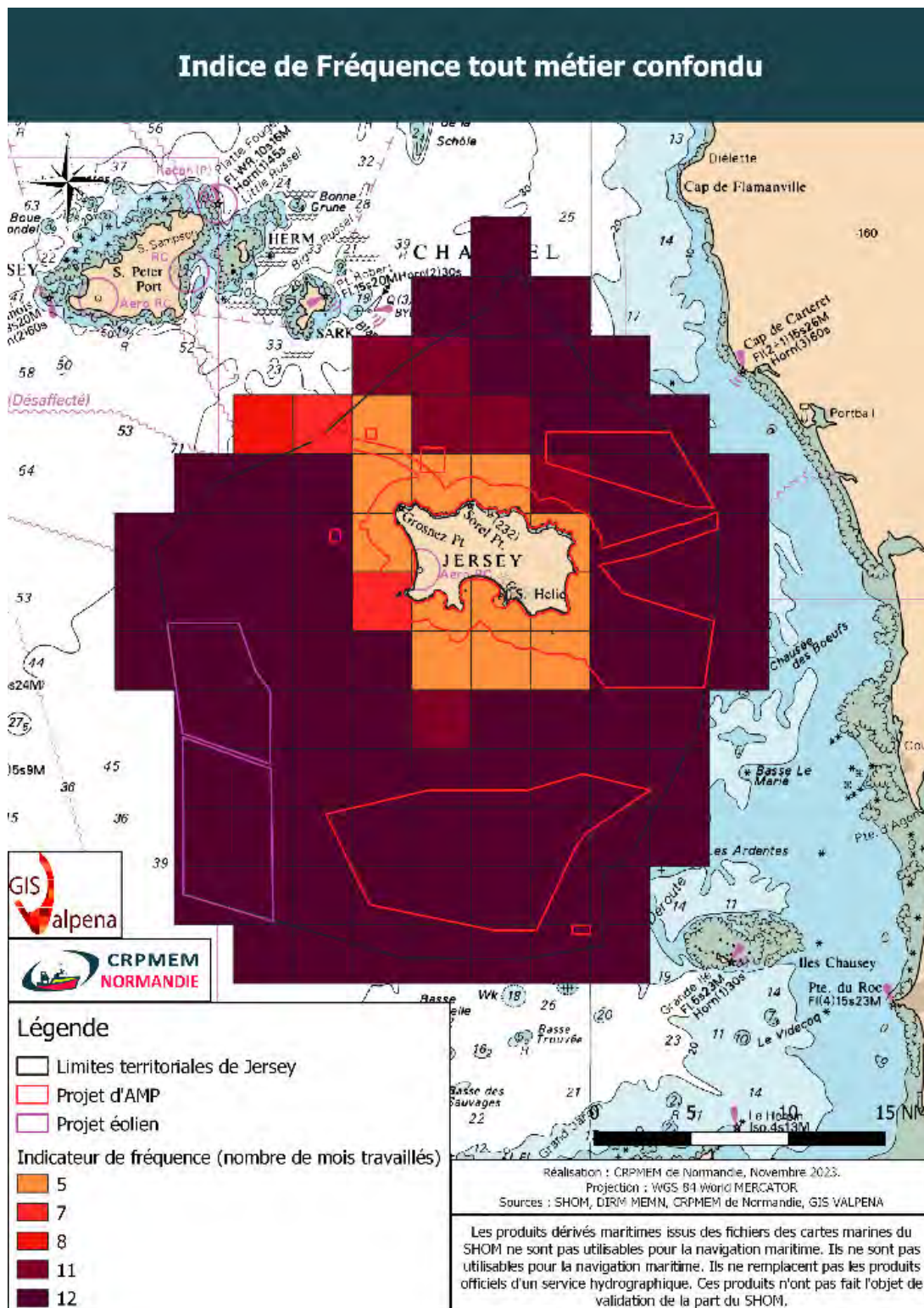


Figure 4 : Indice de fréquence (nombre de mois travaillés) pour les navires normands, tous métiers confondus

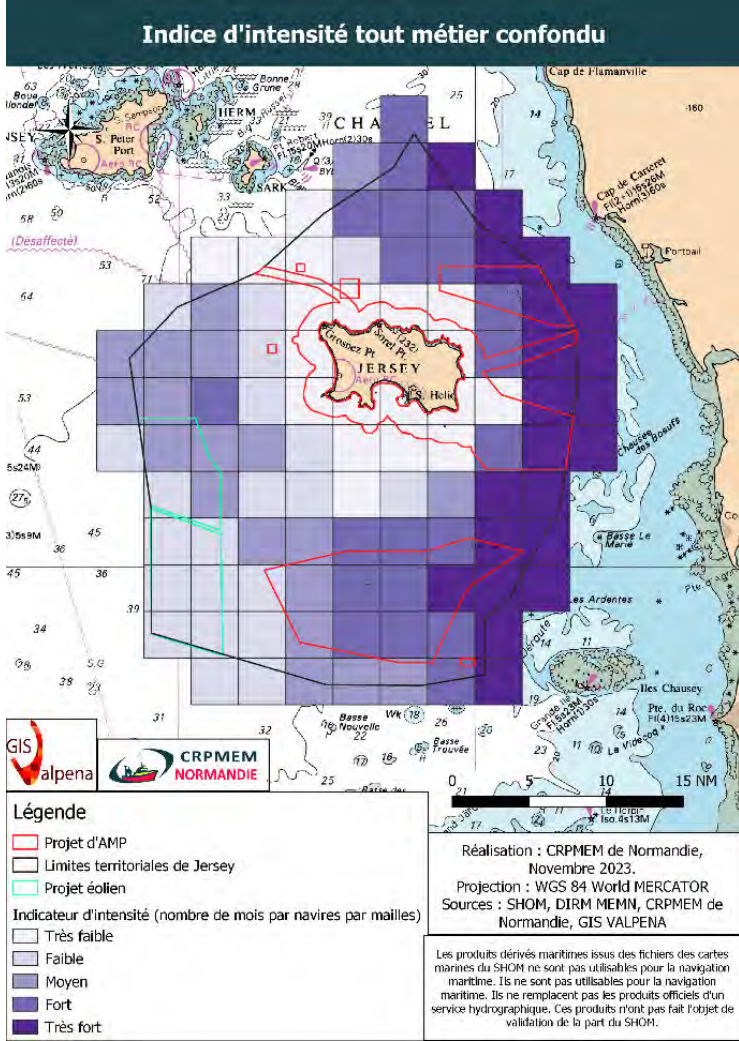


Figure 5 : Indice d'intensité (nombre de mois x navires) des navires normands, tous métiers confondus

Casier à crustacés

Les principales espèces ciblées sont le homard, l'araignée et le tourteau (de manière plus ponctuelle). De récents rapports indiquent que le homard se porte bien à l'échelle globale.

Il s'agit d'une espèce territoriale, qui vit sur les fonds rocheux où elle peut se cacher et s'alimenter. Nous identifions deux secteurs où le homard est particulièrement ciblé : les Minquiers et les Ecréhous. La pêche de cette espèce se fait au casier.

La pêche des araignées est pratiquée principalement au casier pour les navires normands. Nous identifions plusieurs stratégies de pêche pour cette espèce. Il y a les moussettes, des araignées juvéniles fortement valorisées, qui font l'objet d'une pêcherie spécifique sur les côtes du Cotentin. Ces dernières sont présentes de manière saisonnière et sont très mobiles. La pêche commence donc dans les eaux de Jersey dans le courant du mois de mars et évolue vers la côte française, elle se termine généralement dans le courant du mois de juin. Les grands mâles sont également ciblés une grande partie de l'année. En 2020, 50 navires normands, aujourd'hui titulaires de l'accès à Jersey étaient détenteurs d'un Fishing permit Crustacés. Parmi eux, 39 ont participé aux enquêtes Valpena, soit 78%.

L'indicateur de densité Valpena nous montre une activité aux crustacés située principalement dans la partie Est des eaux de Jersey (figure 6). On retrouve bien les fonds rocheux (Ecréhous, Arconies,

Minquiers) mais également les fonds sableux situés entre ces secteurs et qui correspondent à des zones de pêche de l'araignée.

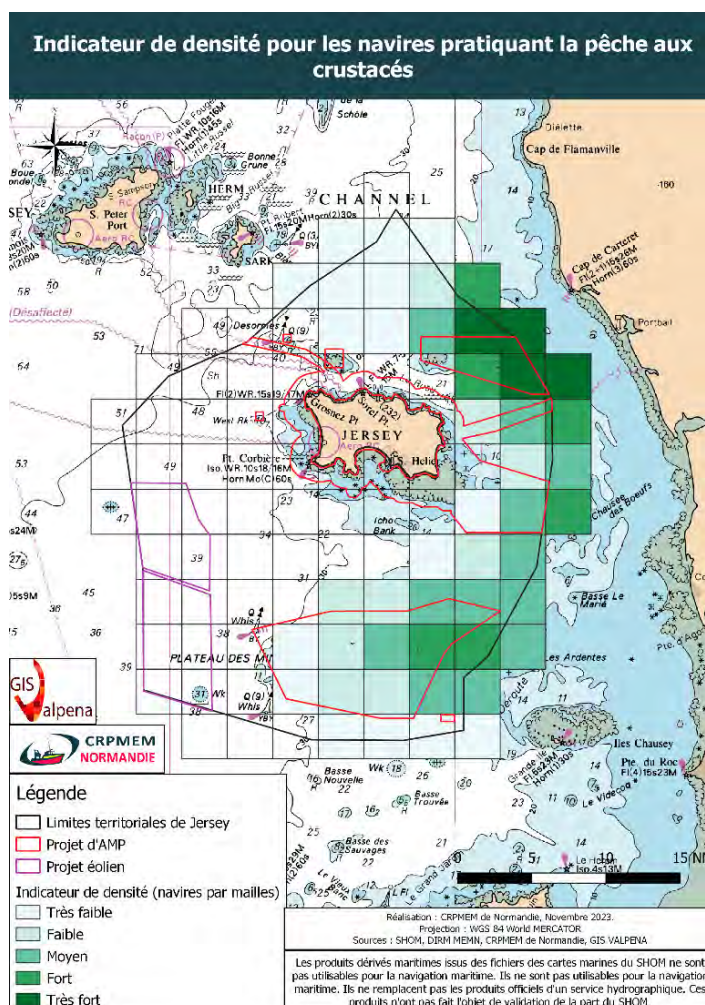


Figure 6 : Indicateur de densité (nombre de navires) pour les navires normands pratiquant la pêche des crustacés

Le secteur des Ecréhous est fréquenté tout au long de l'année, les Minquiers sont fréquentés essentiellement de février à septembre. La bande entre les deux archipels est surtout fréquentée de mars à juillet, ce qui correspond à la période de forte production pour l'araignée.

Casier à bulot (*Buccinum undatum*)

Le bulot est une espèce emblématique de la baie de Granville. Il fait l'objet de suivis depuis de nombreuses années, ce qui permet d'avoir de beaucoup de données à son sujet.

En 2020, 49 navires normands titulaires de la licence bulot Ouest-cotentin avaient une activité dans les eaux de Jersey. Parmi eux, 34 ont participé à l'enquête Valpena, soit 69%.

L'indicateur de densité Valpena nous montre une activité aux bulots située principalement dans la partie Est des eaux de Jersey (figure 7). On retrouve ici une activité pratiquée sur des fonds meubles et à proximité de fonds rocheux. Les secteurs de plus forte fréquentation se trouvent entre le nord des Sauvages et le sud des Ecréhous ainsi que dans le nord des eaux de Jersey.

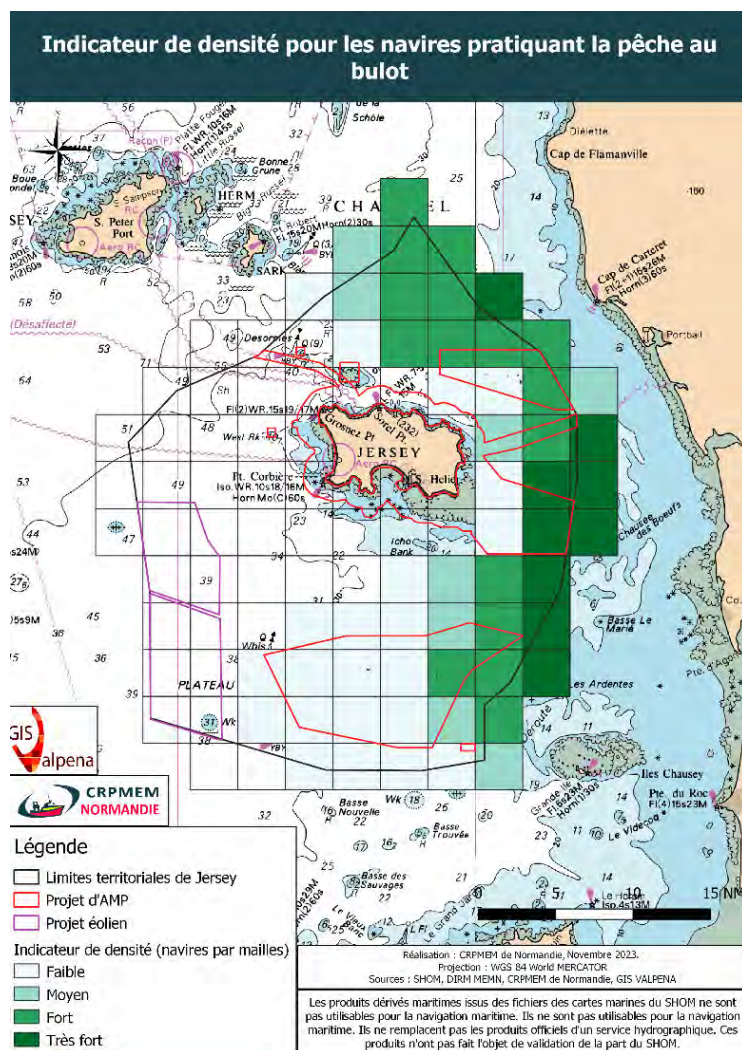


Figure 7 : Indicateur de densité (nombre de navires) pour les navires normands pratiquant la pêche du bulot

L'activité est régulière tout au long de l'année (sauf en janvier où la pêche est fermée). Nous pouvons également identifier trois grands secteurs de pêche : les Sauvages, Les Arconies et le nord des Ecréhous.

Les arts traînants

Dans le cadre du TCA, Jersey a fait le choix d'attribuer un nombre de jours aux navires pratiquant les arts traînants dans leurs eaux afin de prendre en compte la polyvalence de ces navires. Il est vrai qu'un grand nombre d'entre eux peut pratiquer plusieurs métiers sur une même marée.

Concernant les données issues des enquêtes Valpena, 17 navires ont répondu en 2020 sur les 27 concernés, soit 63%. Cela nous a permis d'identifier les zones les plus fréquentées (figure 8).

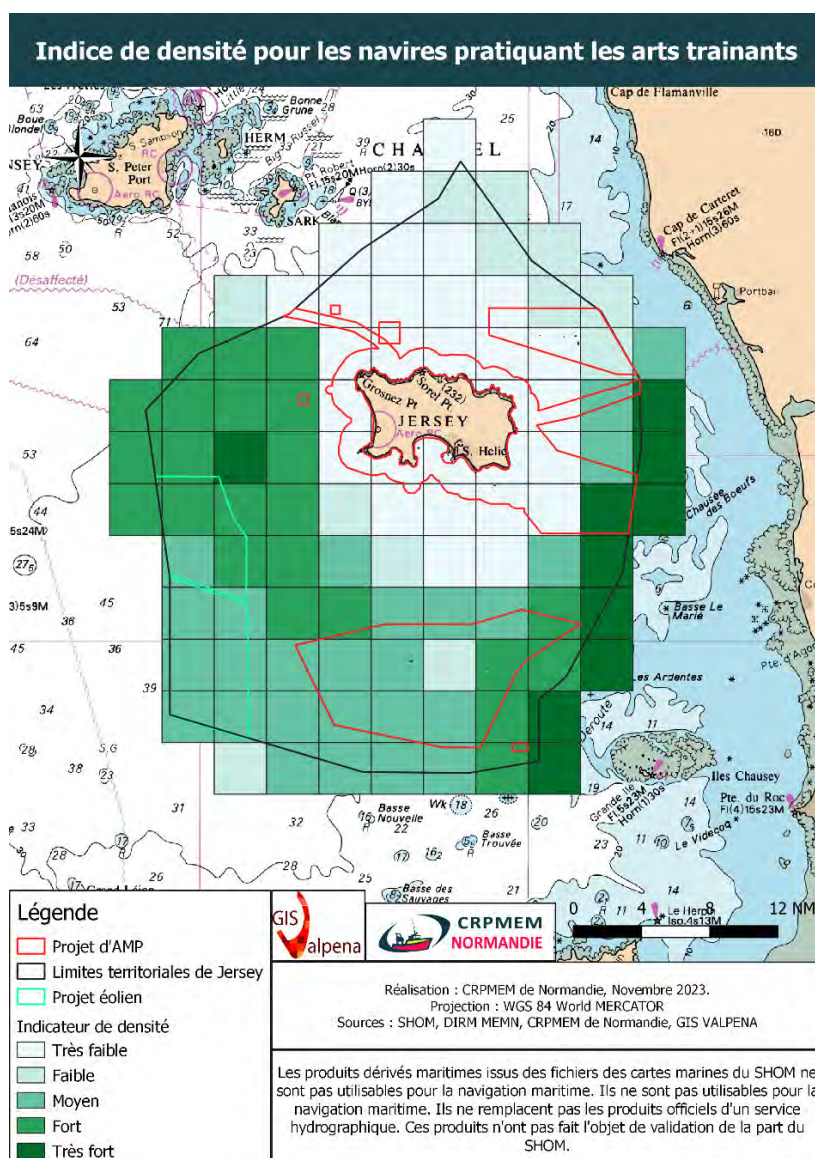


Figure 8 : Indicateur de densité (nombre de navires) pour les navires normands travaillant aux arts traïnants

Nous pouvons observer qu'une grande partie des eaux de Jersey est travaillée par les arts traïnants. Les zones principalement travaillées sont l'Ouest de l'île et l'ensemble de la partie Est des eaux de Jersey frontalières avec les eaux normandes.

A l'Ouest, les activités aux chaluts et à la drague à coquille Saint-Jacques sont pratiquées.

Sur la bande Est des eaux de Jersey, nous retrouvons les métiers aux chaluts et à la drague à coquille Saint-Jacques auquel s'ajoutent les métiers des dragues à praire et amande de mer.

Ces métiers sont essentiellement pratiqués dans les secteurs du Sud et de l'Est des Minquiers, des Sauvages et à l'Est du plateau de l'Arconie. Cela s'explique notamment par le fait qu'il s'agit de zones d'abri par rapport aux vents dominants, donc des zones plus accessibles.

Pour des raisons économiques, les pêcheurs cherchent à limiter leur temps de route, le fait de travailler dans les eaux de Jersey n'est pas une fin en soi mais la réponse à une stratégie de pêche afin de trouver l'équilibre entre production et coûts. Ces secteurs sont donc essentiels au maintien économique des entreprises.

Le JMSP rappelle d'ailleurs dans sa méthodologie qu'il cherche à trouver un équilibre entre les enjeux écologiques, économiques, sociaux et culturels. A ce titre, le JMSP suit la méthodologie de planification

marine spatiale indiqué dans le *Global International Guide on Marine Spatial Planning*¹¹ de l'UNESCO. Ce guide indique que les parties prenantes à considérer dans la consultation peuvent être des parties prenantes étrangères. A ce titre et au regard de l'importance de la pêche française dans les eaux de Jersey, il nous semble indispensable que les navires français soient considérés et que leurs représentants soient consultés à défaut de l'avoir été durant l'année 2023.

De plus, le TCA est peu mentionné dans le JMSP, seulement deux fois sur une dizaine de lignes dans la partie 4.2.4. Le TCA engage tout de même Jersey à respecter les antériorités et l'activité historique des navires français dans ses eaux. Lors de son unique apparition, le JMSP rappelle justement cette obligation de respecter du TCA.

Le fait d'interdire des secteurs très pratiqués par les navires français est donc contradictoire avec le TCA puisqu'à aucun moment les activités de pêche françaises n'ont été considérées et qu'à aucun moment Jersey n'a cherché à créer un dialogue de concertation pour définir les aires marines protégées excluant certaines activités de pêche.

4. Réaction aux zones d'interdiction et de pêche proposées (Chapitre 9.4)

Les zones proposées correspondent aux recommandations faites dans le chapitre 8. Les données de fréquentation des navires normands dans les eaux de Jersey montrent bien que certaines zones proposées représentent des secteurs à fort enjeu pour la pêche normande.

A la lecture du *MPA Assessment Methodology*, nous avons découvert que d'ici 2030 Jersey proposera de nouveaux des zones de protection complémentaires afin d'aboutir à 30% d'aires marines protégées (figure 9).

Sur la figure ci-dessous nous pouvons ainsi observer les zones prioritaires à étendre en AMP, lorsque des travaux complémentaires auront eu lieu.

Premièrement, nous regrettons fortement que l'intention d'étendre le réseau d'AMP autour des zones actuellement proposées ne soit pas affiché de manière transparente dans le JMSP. Il nous paraît important que les périmètres actuellement proposés soit appréciés aux regards de l'ensemble des objectifs visés.

Secondement, nous remarquons que malgré le manque de connaissances scientifiques reconnues, les zones envisagées pour l'avenir se trouvent à nouveau exclusivement dans la partie Est des eaux de Jersey. Dans la mesure où les AMP semblent être associées à une interdiction systématique de la pratique des arts traînants voire de toute pêche, les conséquences du réseau actuellement proposées suivi d'une extension de ce réseau uniquement dans les zones de pêche des navires normands sont extrêmement inquiétantes.

¹¹ UNESCO-IOC/European Commission. 2021. MSPglobal International Guide on Marine/Maritime Spatial Planning. Paris, UNESCO. (IOC Manuals and Guides no 89)

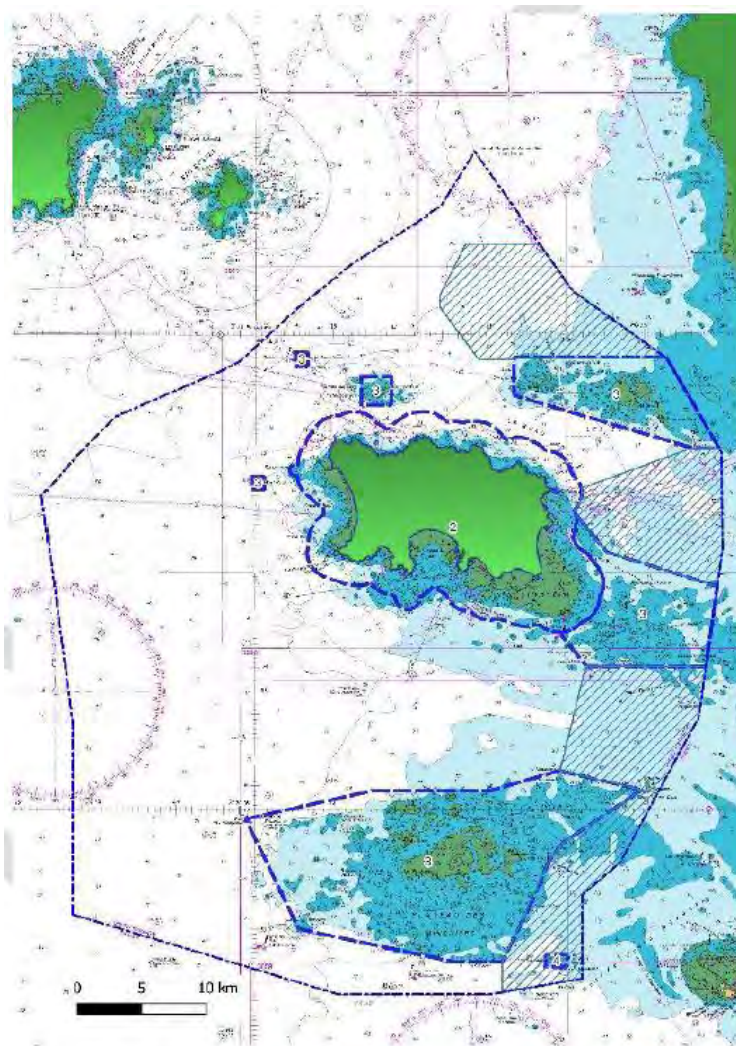


Figure 9 : Zones d'extension potentielle des AMP jersiaises (source : MPA assessment methodology)

Dans ce cadre, il serait judicieux de revoir ces périmètres afin de trouver des solutions qui permettent de remplir les objectifs du JMSP, à savoir la protection des habitats à enjeux, l'atteinte de l'objectif 30% de zones protégées d'ici 2030 mais également la pérennisation des activités existantes.

5. Un référentiel incomplet des initiatives de pêche durable pourtant nombreuse (Chapitre 9.7)

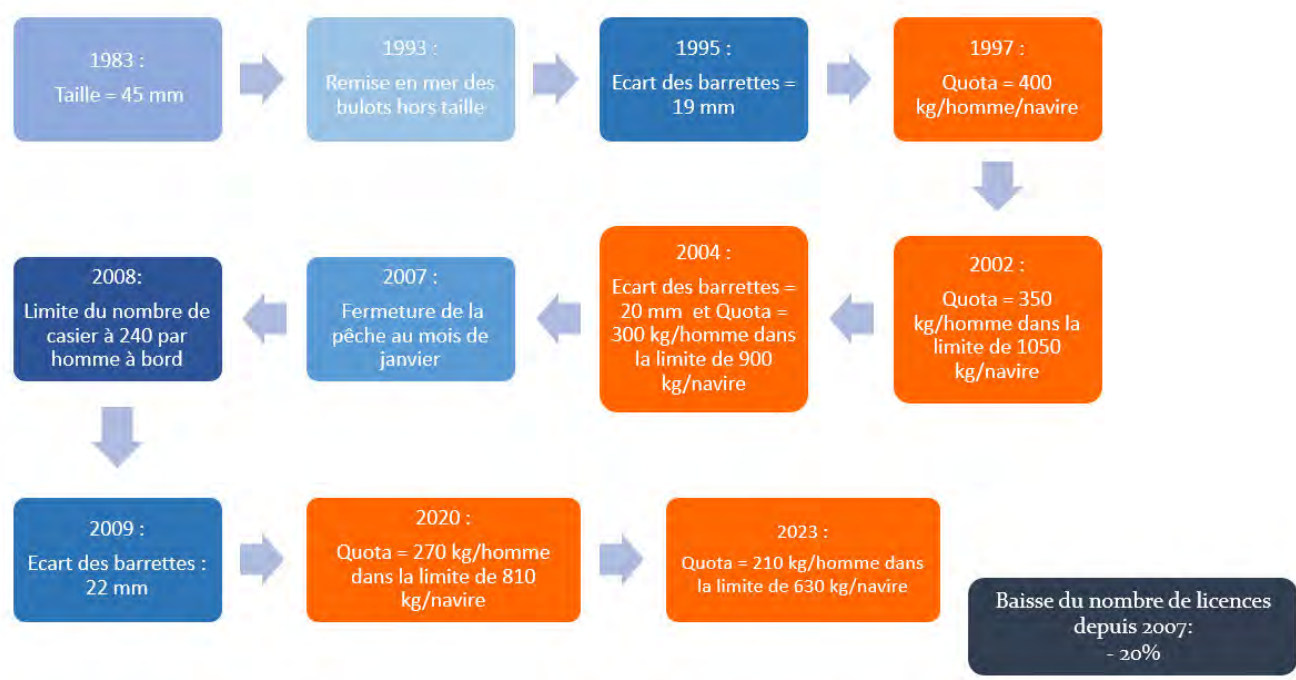
Tout d'abord, ce paragraphe ne mentionne pas les mesures et labels déjà en place ce qui est regrettable. Nous tenons à rappeler que la pêche est déjà règlementée, que ce soit côté français ou jersiais. Dans un objectif de gestion durable, de nombreuses mesures ont été mises en place. Il existe deux niveaux de réglementation : européenne pour les espèces suivies par le CIEM (de manière générale il s'agit des poissons et sélaciens) et régionale pour les autres espèces (coquillages et crustacés).

Pour ces dernières, ce sont les pêcheurs, via les Comités des pêches qui mettent en place des mesures basées sur des suivis halieutiques afin d'assurer une pêche durable et économiquement viable.

La Côte Ouest du Cotentin est d'ailleurs un exemple de gestion sur le long terme avec des espèces suivies et gérées depuis très longtemps, c'est le cas par exemple du bulot pour qui les premières mesures ont été prises dans les années 70 !

Si nous prenons l'exemple de cette espèce, elle fait l'objet de nombreuses mesures de gestion qui ont été prises au cours des années (cf schéma). Ces mesures ont pour but de pérenniser la pêche et de l'adapter au mieux aux conditions de ressource.

• **Mesures de gestion du stock:**



En 2023, la diminution du nombre de licences normandes a permis d'atteindre un nombre de licence total de 65 licences. Parmi elles, 45 étaient associées à des accès aux eaux de Jersey.

Il est également important de rappeler que les eaux de Jersey ont bénéficié de l'ensemble des mesures de gestion normandes ces mesures de gestion jusqu'en 2021 avec la mer commune. Dans ce cadre, bon nombre de mesures communes ont pu être prises à travers le Traité de la Baie de Granville. Ce qui a permis d'assurer une cohérence dans la gestion des eaux sur des flottilles entières. Les figures 10 et 11 présentent l'ensemble des mesures qui ont été prises de manière commune ces trente dernières années.

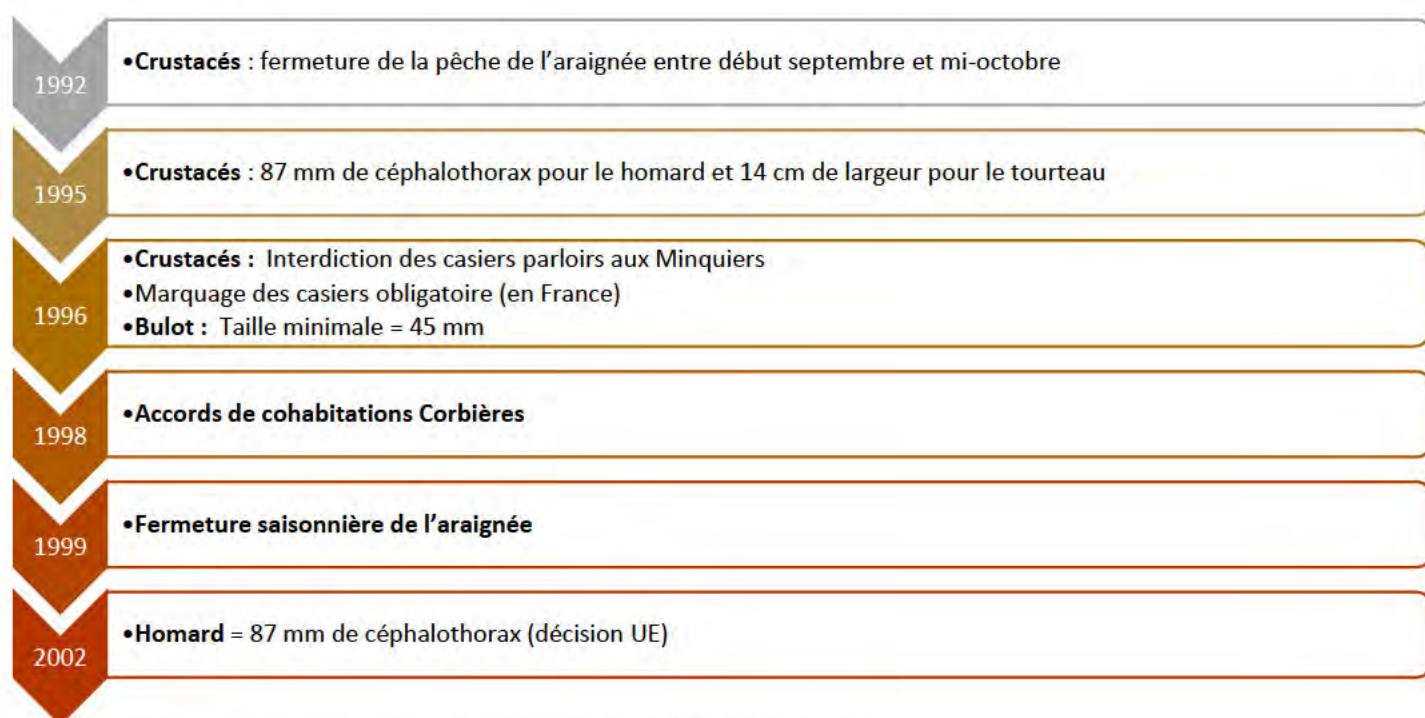


Figure 10 : Mesures communes prises avant la signature du Traité de la baie de Granville

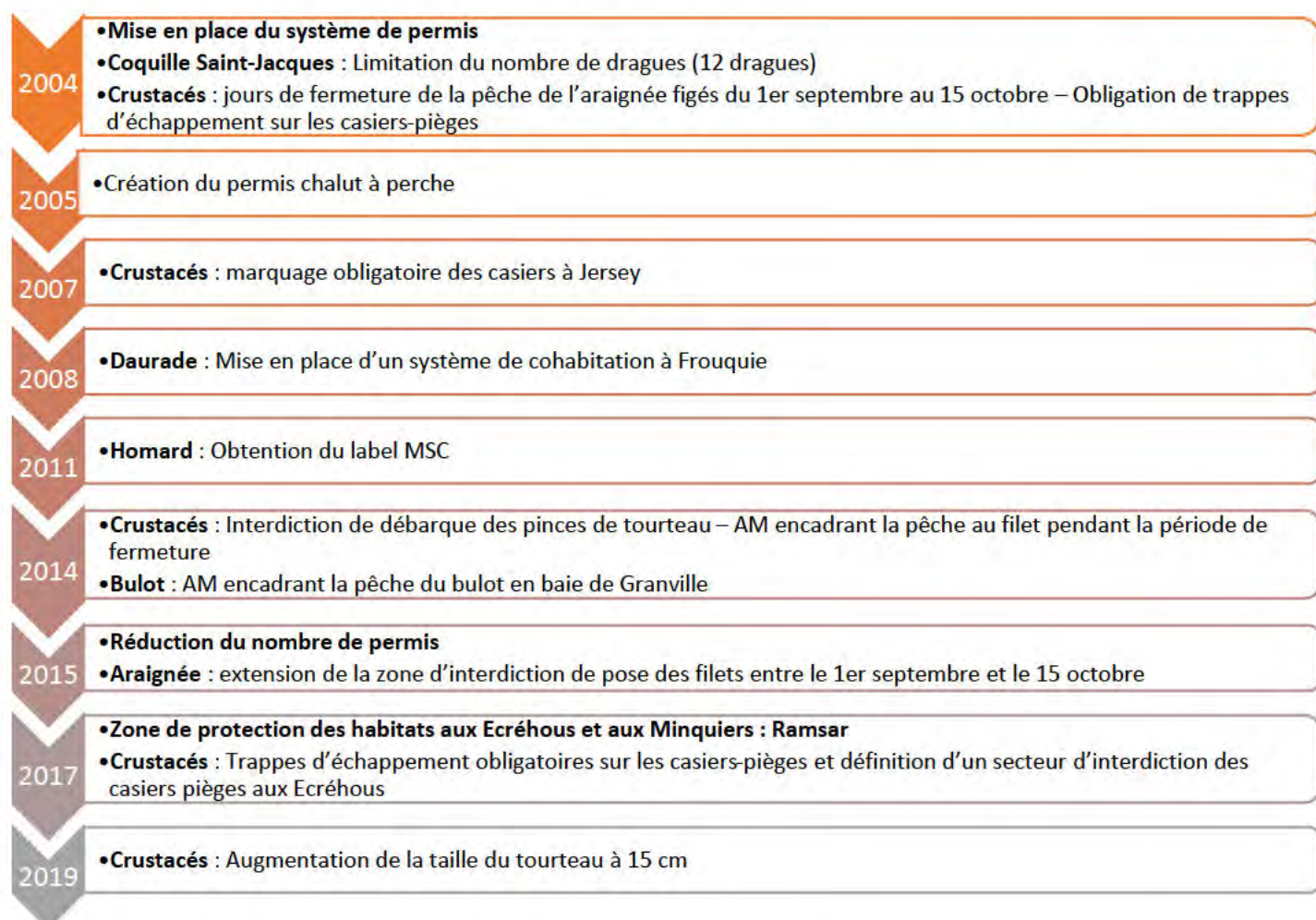


Figure 11 : Mesures communes prises après la signature du Traité de la baie de Granville

La mise en place de cette gestion commune, même si elle reste perfectible, a permis d'aboutir à des mesures cohérentes à l'échelle des stocks locaux et compatibles avec leur cycle de vie et leur biologie.

De plus, les mesures mises en place sur les casiers à crustacés permettent de répondre à certains objectifs du JMSP concernant la pêche fantôme : les casiers-pièges ont la particularité de rester très pêchants lorsqu'ils sont perdus, le fait de les avoir interdits dans les Minquiers et les Ecréhous (figure 12) permet donc de limiter fortement des impacts liés à la pêche fantôme.

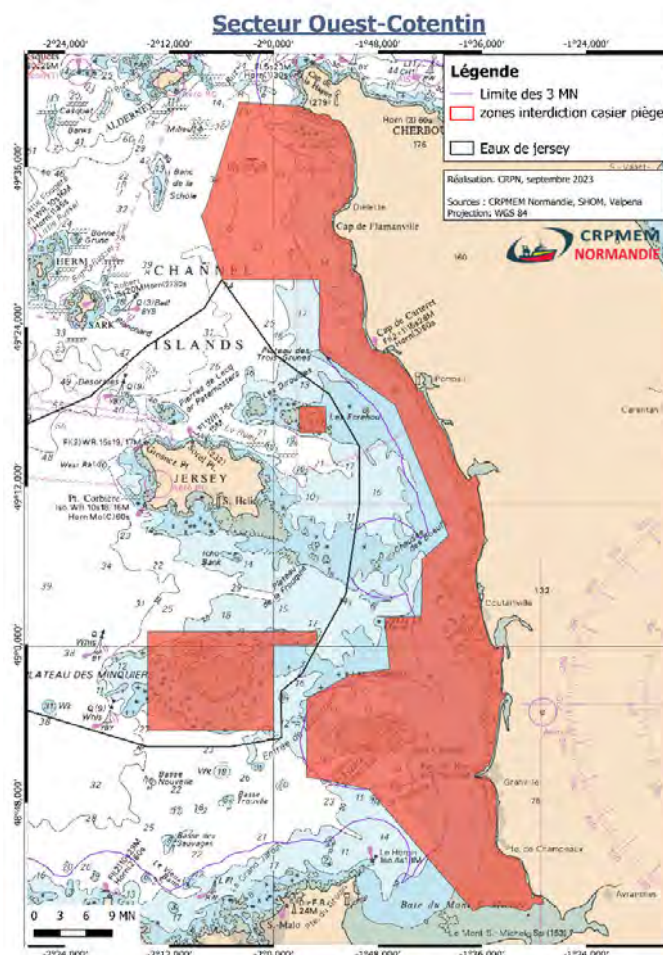


Figure 12 : Zones d'interdiction des casiers pièges

Par ailleurs, le fait d'avoir rendu obligatoires les trappes d'échappement sur l'ensemble des casiers-parloirs (et sur tous les casiers à crustacés côté normand) permet de réaliser un tri sur le fond et non sur le pont. Les homards sous-taille n'ont donc plus à subir le fait d'être rejetés dans la colonne d'eau où ils étaient très vulnérables. De plus, cela permet aux petits homards de ressortir plus facilement, limitant donc le risque de cannibalisme au sein des casiers.

Ces mesures ont d'ailleurs permis d'aboutir à l'obtention du label MSC pour le homard en 2011. Ce dernier a la particularité d'être partagé entre Jersey et la Normandie, ce qui est unique. Cela représente plus de 10 ans de certification. Il s'agit là d'un modèle de gestion commune qui a porté ses fruits. L'obtention et le maintien de ce label, renouvelé en décembre 2023, montre l'engagement commun d'aller vers une pêche durable, cela a également permis une forte amélioration des connaissances sur l'état de ce stock.

Nous avons tout intérêt à continuer à travailler dans ce sens et à travailler de concert afin de garantir la durabilité des pêcheries. Nous tenons à rappeler que nous travaillons sur des stocks communs, non concernés par la frontière, nous avons donc les mêmes enjeux.

6. Synthèse : Une demande de co-construction

En tant que structure professionnelle ayant pour but de défendre les intérêts de la pêche artisanale normande, le CRPMEM de Normandie souhaite apporter sa contribution à ce document dans le but de rappeler l'importance des eaux jersiaises pour la pêche normande et le besoin de sa prise en considération.

Au fil des années, les navires de pêche normands ont continuellement perdu des droits dans les eaux jersiaises (tableau 1). Cela s'associe à un sentiment d'injustice parmi les professionnels qui ne comprennent pas la perte des droits alors que leurs pratiques évoluent uniquement dans le sens d'une gestion plus durable et d'une baisse de l'effort de pêche.

Tableau 1 : Evolution des modalités d'accès dans les eaux de Jersey

Date	Événement	Impact sur la pêche normande
1951	Accord entre la France et l'Angleterre de préservation des droits de pêche	Dans le cadre de l'arbitrage, quelles que soient les décisions du tribunal, il n'y doit pas y avoir d'impact sur les droits de pêche français ou jersiais
1953	Arbitrage sur la nationalité des Minquiers et des Ecréhous	Attribués à Jersey Pas de conséquences sur les droits de pêche
2000	Traité de la Baie de Granville	Mise en place des zones A, B, C, D, D1 = perte d'accès pour certains navires Limitation du nombre de navires Passage aux 3 MN de la laisse de basse-mer
2017	Mise en place des zones RAMSAR	Interdiction de pêche dans les Minquiers et les Ecréhous pour les arts traînants
2020 - 2023	Fin du Traité de la Baie de Granville Signature du TCA Négociations post-Brexit	Perte accès : navires ayant travaillé moins de 11 jours sur la période d'antériorité, plafond de jauge et de puissance Perte de zones de pêche : Zones frayères à daurades Perte de droits : Mise en place de Nature et Ampleur de l'activité, mise en place du nombre de jours
2024	Mise en place du MSP ?	Grosse perte de zones de pêche

Nous tenons à rappeler que la pêche française représente une part importante de l'activité dans les eaux de Jersey et cela depuis des siècles. Alors que leurs droits de pêche ont été largement amputés par le Brexit et que les négociations post-Brexit ne sont pas finalisées, cette nouvelle couche réglementaire risque de peser terriblement sur les entreprises de pêche déjà fragilisées. Cela implique donc de les prendre en considération ainsi que les enjeux économiques qui y sont associés.

Nous ne sommes pas opposés à la protection des habitats lorsque c'est nécessaire, la démarche existe également côté français, cependant nous pensons qu'il est possible d'atteindre les objectifs environnementaux tout en préservant les activités de pêche artisanales normandes.

Vous trouverez ci-dessous nos remarques et demandes concernant le JMSP :

- Le JMSP ne prend pas suffisamment en considération le TCA alors qu'il s'agit d'un accord international au même titre que les conventions environnementales. **Nous souhaitons que des moyens suffisants soient mis en place pour le respecter.**
- Malgré la présence historique des pêcheurs français à Jersey, malgré les recommandations du guide de planification de l'UNESCO suivi par Jersey, malgré 1 an de consultation des parties prenantes réalisées, malgré le nombre de réunions communes auxquelles nous nous sommes vus en 2023, **nous regrettons que la pêche française n'ait pas été considérée comme une partie prenante et qu'elle n'ait pas été consultée en amont de la démarche.**
- Nous regrettons la surprise que nous avons eue de découvrir, dans un document de référence, l'intention d'étendre le réseau d'AMP d'ici 2030 autour des zones actuellement proposées. Nous aurions souhaité que cette intention soit affichée de manière transparente dans le JMSP, d'autant plus qu'il s'agit de zones uniquement à l'Est de Jersey et donc de zones de pêche des navires français, tout comme les zones déjà proposées.
- Les câbles sous-marins doivent être ensouillés ou protégés pour permettre le maintien de l'ensemble des activités de pêches (trainants et dormants).

➔ **Nous remettons en cause la validité des données, leur fondement scientifique et la neutralité des analyses présentées car :**

- La description des habitats se base sur des documents non scientifiques : l'ONG Blue Marine Foundation est une ONG anti-pêche. **Nous souhaitons la réalisation d'études issues d'organismes scientifiques locaux.**
- Les mesures proposées sont fondées uniquement sur le principe de précaution : **Ce n'est pas acceptable.**
- Les mesures proposées exclues systématiquement les arts trainants : **Ce n'est pas acceptable. L'exemple des AMP françaises montre que l'impact des arts trainants est tout d'abord évalué avant toutes propositions de mesures ajustées.**

Sur le diagnostic des habitats

- Les données pour cartographier les habitats, vieilles de 40 ans, ont été actualisées avec des données de 2014. L'état des connaissances date de 10 ans. Les habitats ont pu évoluer. **Il faut actualiser l'état des connaissances avec des études scientifiques récentes.**
- L'état de conservation des habitats n'est pas pris en compte. **En cohérence avec les travaux français et pour ajuster les mesures de conservation nécessaires nous souhaitons que l'état de conservation des habitats soit considéré.** A titre d'exemple, les AMP françaises permettent de protéger seulement les zones où c'est nécessaire.
- La qualification et la quantification de l'impact réel des engins de pêche sur les habitats est non évalué en Manche. Le niveau de dégradation d'un engin sur un habitat est non connu. **Il y a besoin d'acquisition de connaissances.**
- Les habitats peuvent subir des effets liés à l'environnement, à la pêche ou aux deux facteurs conjointement. Actuellement, il n'y a aucune connaissance permettant de différencier l'origine d'effets sur des habitats. **Il y a besoin d'acquisition de connaissances avant de prendre des mesures.**
- Il est recommandé de protéger au minimum 30% de chaque habitat mais cela est variable selon la surface et l'état de conservation des habitats → actuellement, il est proposé de protéger 100% des herbiers de zostère, 89% des laminaires et 87% du maërl. **Il est donc possible de trouver un juste milieu pour concilier protection des habitats et activités de pêche.**

➔ Nous souhaitons que la pêche ne soit pas une variable d'ajustement à sacrifier uniquement pour remplir les objectifs annoncés. De même, nous ne souhaitons pas que des mesures d'exclusion des activités de pêche soient prises alors même qu'un habitat présente un bon état de conservation, cela laisserait penser que l'objectif serait plutôt d'exclure la pêche plutôt que de réellement protéger un habitat.

Sur les habitats à fort intérêt :

- Herbiers de zostères : l'exemple de Chausey montre un habitat résilient présentant un développement constant depuis 1980 alors qu'il n'y a aucune mesure restrictive des activités de pêche. L'impact de la pêche est donc négligeable : **Il est nécessaire de réaliser un suivi de l'évolution des herbiers à Jersey.**
- Forêts de laminaires : Selon OSPAR, l'état de conservation de cet habitat est non menacé à Jersey. Ces forêts ne sont pas fréquentées par les arts traînants car impropres à la pêche. La description des espèces constituant ces forêts est imprécise : **la priorité est donc d'identifier leur composition, et leur état de conservation.**
- Bancs de maërl : Selon OSPAR, l'état de conservation de cet habitat est non menacé à Jersey. **Il serait donc intéressant d'identifier quels sont réellement les besoins de conservation avant de prendre des mesures ultra-restrictives et ayant un impact économique fort.**
- La « No Take Zone » des Sauvages
 - Désignation basée sur une étude produite par une ONG anti-pêche s'appuyant elle-même sur des éléments produits par l'administration jersiaise et non sur des documents scientifiques objectifs et neutres.
 - La présence de coraux d'eau froide à croissance lente montre que **les activités de pêche présentes sur ce secteur n'ont pas d'interactions directes avec ces espèces.**
 - Pas de précisions sur les interactions potentielles entre les engins de pêche et les brachiopodes dont la taille en elle-même constitue la meilleure protection.
 - **Quelle est la valeur écologique réelle de ce récif par rapport à d'autres secteurs des eaux de Jersey ?**
 - **Il y a une importante activité de pêche dans ce secteur, à peine mentionnée dans le document et basée sur des données erronées concernant la pêche normande**

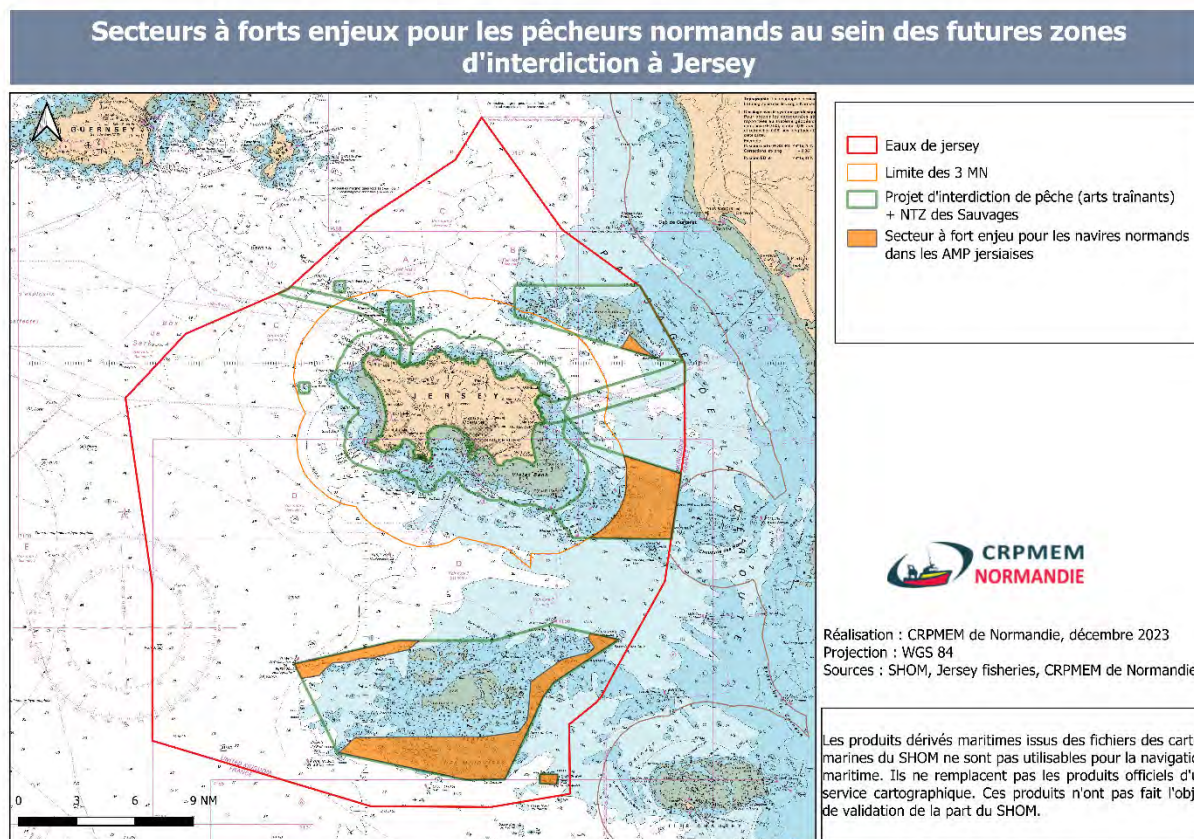
➔ Pour les habitats à fort intérêt, les facteurs environnementaux sont les plus influents sur la dynamique des habitats comparés aux autres usages. Pour proposer des mesures non pas sur le principe de précaution mais sur des preuves tangibles, il y a un réel besoin d'études visant à caractériser l'état de conservation des différents habitats, de discerner l'impact environnemental (houle, courant...) de l'impact anthropique, d'identifier et de quantifier l'impact réel des différents engins sur les différents habitats.

Sur la description des activités de pêche

- **Il est dommage que seules les données de débarquements aient été présentées car elles ne reflètent en rien l'état actuel des stocks.** Ces données, sur des stocks communs à nos deux pays, sont d'ailleurs en contradiction avec les données issues d'organismes scientifiques français.

- Il n'a pas mentionné les efforts de gestion des navires français dans les eaux de Jersey depuis des décennies ainsi que les écolabels commun (MSC homard et bulot), signes d'une pêche durable.
- Dans le JMSP, l'analyse des activités de pêche est extrêmement faible (seulement de la présence/absence de navires)
- L'explication de la méthodologie est peu claire et porte à confusion puisque les flottilles françaises et jersiaises ont été graphiquement mutualisées alors que la description ne parle que des navires de Jersey.
- L'analyse des activités de pêche des navires de Jersey et des navires français est inégale et basée sur une méthodologie différente :
 - Les navires de Jersey sont décrits sur 10 ans au travers des données VMS, AIS et des enquêtes pluriannuelles FISHMAP. A l'inverse, les navires français sont inclus au travers d'une seule source de données (VMS), sur une seule année où nous étions en négociation post-Brexit et où la réglementation était extrêmement fluctuante. **L'analyse des activités de pêche française est non représentative et incomplète sur cette période.**
 - L'activité sur certains secteurs a été largement minorée et donc ne reflètent pas les enjeux pour certains métiers (exemple : secteur des Sauvages). **Il est donc nécessaire, à minima, que les activités de pêche françaises soient mentionnées à leur juste valeur telles qu'elles sont pratiquées dans les eaux de Jersey**
 - Une utilisation des données VMS douteuse : 25% des données n'ont pas pu être reliées à des déclarations de pêche mais ont pourtant été traitées.

➔ Comme préconisé par Jersey, nous proposons qu'une analyse socio-économique de l'activité des navires français soit réalisée, cependant en sollicitant les représentants des pêches français pour que l'analyse soit la plus représentative possible.



Afin de répondre à vos objectifs de conservation tout en préservant nos pêcheries artisanales, à l'instar de la démarche à laquelle nous avons été associés lors de la mise en place des zones de protection Ramsar, nous souhaitons qu'un dialogue de concertation soit mis en place entre Jersey et les représentants des pêches français avant l'adoption des zones proposées et la finalisation du JMSP.

Nous aimerions pouvoir revoir les zones proposées car nous pensons qu'il est possible d'arriver à la même surface protégée et pour des habitats tout aussi intéressants d'un point de vue biologique mais avec des impacts moins marqués sur la pêche normande.

TEMOIGNAGES : Contributions individuelles de pêcheurs normands

Des pêcheurs normands ont également apporté leur contribution à titre individuel à cette consultation. Certaines de ces contributions nous ont été retransmises et sont présentées ci-dessous.

Au-delà des ballets diplomatiques, des conventions et lois, des arguments scientifiques plus ou moins complets, des analyses administratives, se joue la vie d'hommes et de femmes pleinement intégrés dans la vie sociale, culturelle et économique du littoral.

Nous tenions à partager ces témoignages.

Il s'agit des pêcheurs :

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Contribution de [REDACTED], navire [REDACTED]

Madame, Monsieur,

Je tiens à vous faire un retour au sujet de la consultation publique en cours. [REDACTED], [REDACTED] ans, patron et armateur du [REDACTED] depuis mars [REDACTED]. Je suis inscrit maritime depuis [REDACTED] et pratique la pêche depuis mes 20 ans.

Je suis la troisième génération de pêcheurs dans ma famille. Mon père et mon grand-père avant moi ont travaillé dans les eaux de Jersey, de Guernesey et de Sercq.

Je pratique la pêche de bulots et de gros crustacés (araignées, homards) dans la zone des Dirouilles et des Ecréhous, toute l'année, sauf au mois de janvier à cause de la fermeture de la pêche des bulots.

La cohabitation avec les pêcheurs jersiais s'est toujours bien passée pour ma part. Les relations étaient déjà bonnes sous le Traité de Baie de Granville. Depuis le Brexit, et malgré les difficultés de mise en place au départ, tant pour les pêcheurs jersiais que pour les pêcheurs français, ces relations sont toujours bonnes entre pêcheurs aujourd'hui.

Cependant, je pense que les projets envisagés par Jersey de développer un réseau d'aires marines protégées, interdites aux arts traînants, mais aussi d'implanter un parc éolien, vont fortement réduire les zones de pêche des chalutiers, qui vont devoir exploiter les zones déjà occupées par les caseyeurs. La cohabitation sera difficile car les deux types d'exploitation ne sont pas idéalement compatibles. Cela va impacter les pêcheurs français entre eux, mais aussi les pêcheurs jersiais et les pêcheurs normands. L'espace qui sépare nos côtes de Jersey n'est pas si grand et pourra difficilement accueillir tant de navires. Il y aura forcément un impact sur la petite pêche artisanale, que je pratique, déjà en difficulté quant aux quotas.

Actuellement, l'espace est déjà très occupé, il est important de voir que nous travaillons partout afin d'effectuer des rotations et éviter d'épuiser un secteur, le fait de retirer de si grandes zones va donc avoir un impact sur la ressource et entraîner de la surpêche. De plus, cela va provoquer des problèmes de cohabitation sur les secteurs qui resteront ouverts.

Il serait dommage que la petite pêche artisanale disparaisse des eaux normandes et jersiaises, car à mon avis, c'est la pêche la plus respectueuse du milieu marin, avec une gestion réfléchie et durable des ressources et des saisonnalités.

Encore une fois, vous nous présentez ici des mesures qui vont diminuer les possibilités de pêche des navires professionnels, français ou jersiais. Cela ajoute donc une contrainte supplémentaire à la pratique de la pêche. Nous nous sentons totalement mis dehors, que ce soit avec la perte des zones de pêche mais aussi avec la mise en place de ce genre de démarche. Nous avons toujours travaillé dans les eaux de Jersey et il est difficile de s'imaginer en être exclu étant donné notre histoire mais également vu la distance qui nous sépare : seulement quelques milles entre Carteret et les Ecréhous...

Bien cordialement

Contribution de [REDACTED], navire [REDACTED]

Bonjour,

Je m'appelle [REDACTED], je suis patron armateur du chalutier-coquillier [REDACTED]. Nous pratiquons la pêche dans les eaux de Jersey depuis 37 ans au chalut comme à la drague à coquille Saint-Jacques. Nous pratiquons le chalut pratiquement toute l'année dans les eaux de Jersey. Nous ciblons la daurade au printemps et nous avons perdu depuis le Brexit les $\frac{3}{4}$ des zones de pêche à Jersey pour cette espèce. Le projet tel qu'il est présenté me retire toutes les zones de pêche. Je tiens à rappeler que la pêche de la daurade se fait au chalut pélagique, qui n'a pas d'impact sur le fond.

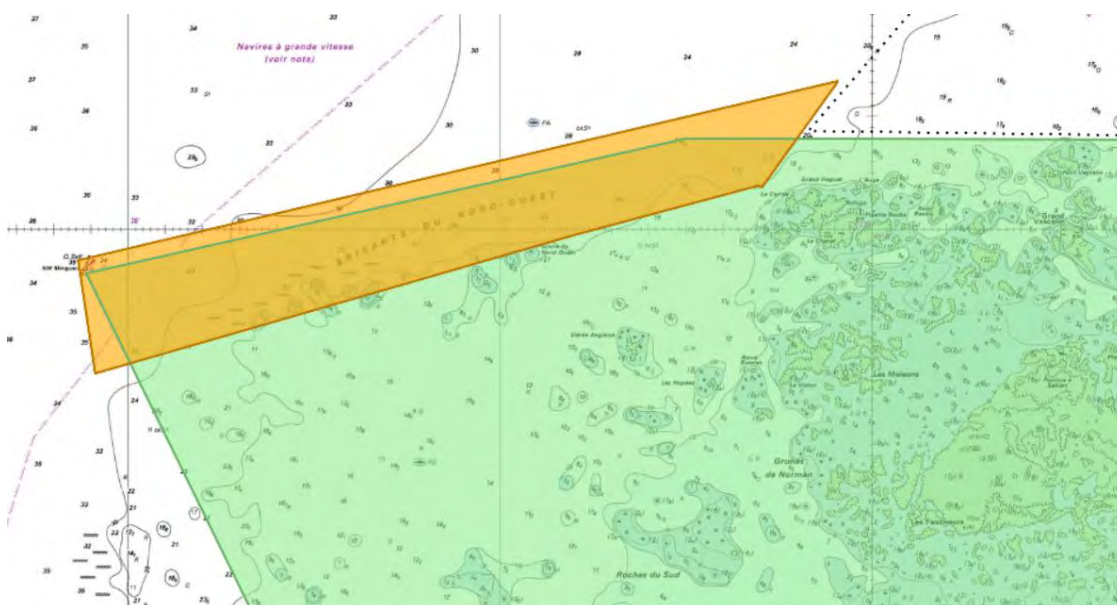
Nous faisons également le chalut dans l'est et dans l'ouest de Jersey, si les aires marines protégées sont mises en place, nous perdrons toutes nos zones à l'est.

Ma famille pratique la pêche dans les eaux de Jersey depuis au moins 4 générations. On s'est vu retirer des zones de pêche depuis 30 ans. Nous sommes des bateaux d'artisans-côtiers, il n'est pas possible de partir pêcher au large.

Nous perdons des droits de pêche de manière régulière dans vos eaux, d'abord sous prétexte de protection des habitats avec les sites Ramsar, puis il s'agit de protection des daurades avec les zones de nidification et là, la protection de 25% de vos eaux, et cela en mentionnant d'office une future interdiction des arts traînants. Je ne parle même pas des pertes de droits engendrées par le Brexit alors qu'il était encadré par un Traité censé nous garantir la possibilité de travailler « comme avant ».

La façon dont ces mesures sont présentées, et les zones identifiées comme futures aires marines protégées me font douter du réel bienfondé de la démarche : est-ce uniquement une volonté de protéger les habitats ou est-ce un moyen supplémentaire de faire pression sur les arts traînants français ?

Concernant les sites eux-mêmes, il y a deux zones qui représentent un fort enjeu économique pour moi, elles sont présentées dans les cartes ci-dessous.





Concernant le secteur des Arconies, nous sommes nombreux à l'utiliser comme zone d'abri : elle permet de travailler par des vents d'Ouest Sud-ouest, ce qui la rend très importante pour nous.

Il est vraiment important que l'on puisse discuter avec vous de ces secteurs. Je sais que nous sommes maintenant deux pays différents, qu'il n'y a plus de Traité qui nous unit mais il doit être possible de pouvoir maintenir les échanges.

Lors de la mise en place des sites Ramsar, nous avons été consultés et cela avait permis de définir des zones qui permettaient de protéger les habitats à enjeux tout en limitant les impacts sur notre activité. Ce type de procédé permet d'évoluer plus sereinement et donc de limiter les tensions qu'un tel projet peut générer.

On sort à peine du Brexit, on a entendu partout que les pêcheurs locaux ne seraient pas impactés par le Brexit, or ce n'est pas vrai et là vous parlez de nous retirer à nouveau des zones de pêche.

Durant toute cette période trouble, nous avons tout fait pour garder un climat de bonne entente avec nos collègues de Jersey et on aimerait bien que cela puisse continuer.

En vous souhaitant bonne réception.

Contribution de [REDACTED], navire [REDACTED]

Madame, Monsieur,

Je suis **Mr [REDACTED]**, Patron-pêcheur de [REDACTED] ans, propriétaire du navire de pêche « [REDACTED] » acheté en septembre [REDACTED]

Issue d'une famille de pêcheurs, c'est mon père lorsqu'il était patron du chalutier « [REDACTED] » qui m'a donné l'envie et la passion d'exercer le métier d'artisan pêcheur. Depuis [REDACTED] je suis embarqué sur le [REDACTED]. En [REDACTED], je suis devenu le patron jusqu'à en être le propriétaire depuis [REDACTED]. Cela fait donc 23 ans que je suis sur le même navire de pêche artisanale dans les mêmes eaux.

Comme vous pouvez le constater, je suis le navire qui a le plus de jours acquis dans les eaux de Jersey. Ceci s'explique car **j'exerce mon métier UNIQUEMENT dans les eaux de Jersey et toute l'année.**

C'est pourquoi je suis attaché à entretenir de bonnes relations avec vous. Je vous fournis en temps et en heure mes déclarations de pêche. À chaque fois que je me fais contrôler par vos services de contrôle, et cela depuis des années, je suis toujours courtois, poli et ouvert au dialogue pour entretenir nos bonnes relations voisines, même depuis les complications du Brexit. Ainsi, je respecte scrupuleusement la réglementation jersiaise. Je n'ai jamais été verbalisé pour du surquotas ou du hors-taille par exemple.

Si je travaille entièrement dans les eaux jersiaises, c'est que je n'ai pas le choix, pas d'autres endroits où je pourrais pêcher des amandes de mer (GKT). Cette espèce très localisée représente 3/4 de ma pêche annuelle.

Je suis l'un des seuls navires de Granville et même de l'Ouest Cotentin à exercer cette pêche bien spécifique. Contrairement aux autres navires qui pêchent essentiellement autour de Chausey, avec la possibilité de s'abriter autour de l'archipel en cas de mauvais temps, mon activité m'occasionne des frais de gazole supplémentaire pour rejoindre les eaux de Jersey. De plus, je n'ai pas de zones d'abris, je suis toujours en plein vent.

Mon activité m'oblige à travailler dans des secteurs spécifiques. Je n'ai d'autres choix que de travailler au Sud et à l'Ouest des Minquiers, au contour de la zone RAMSAR existante. Je travaille également dans les secteurs des CAUX, à l'ANQUETE, la GRUNE LA HAUCHE, Les ARCONIES, de l'ECREVIÈRE et dans le secteur des câbles téléphoniques.

Toutes ses zones citées sont indispensables au bon fonctionnement de mon entreprise.

Je suis également étonné que les retombées liées au BREXIT ne soient finies et que nos voisins jersiais veulent déjà nous imposer de nouvelles interdictions de pêche via des aires marines protégées (AMP) en excluant systématiquement les arts traînants. En France, les AMP n'excluent pas systématiquement les arts traînants qui restent ainsi autorisés. Je suis donc dans l'incompréhension.

Je tiens à dire que je travaille dans des fonds sableux, contrairement à ce que vous pouvez indiquer la carte des habitats sur certaines zones, et que je peux vous certifier n'avoir jamais pêché d'herbier de zostère, de Kelp ou de Maërl dans les secteurs où j'exerce mon activité. Preuve que la pêche aux arts traînants est compatible dans certains secteurs. Protéger ne veut pas dire interdire.

Par conséquent, je vous sollicite pour que vous étudiez mon cas personnel, pour entamer un dialogue afin de trouver un « terrain d'entente ». Je souhaite que l'on puisse se concerter, échanger sur des zones à privilégier plutôt que d'autres. Je souhaite que nous trouvions des solutions de façon conjointe qui conviennent et sont acceptées par tout le monde, comme cela l'a été dans le passé pour les zones RAMSAR et qui a fait ses preuves.

Enfin, j'aimerais vous faire part que **la survie de mon entreprise de pêche artisanale et celle de ma famille dépend EXCLUSIVEMENT de mon activité de pêche dans les eaux de Jersey.** Mon entreprise

fait vivre 3 matelots et leur famille. Elle fait aussi vivre ma propre famille puisque mon père et mon épouse sont employés à terre pour l'entreprise.

Si malheureusement toutes les AMP proposées étaient interdites à vie, je serais dans l'obligation d'arrêter mon métier que j'exerce avec passion, de vendre mon bateau qui est toute ma vie, de licencier mes 3 matelots, ainsi que mon père et mon épouse. Ce serait terrible.

En espérant que ma participation et mon exemple soient étudiés et considérés par Jersey. Je reste convaincu que l'amitié entre nos deux pays permettra de trouver une solution commune. Je me raccroche à cet espoir afin de pouvoir continuer à vivre de mon métier qui m'a été transmis de père en fils avec passion.

En effet, depuis le Brexit et toutes les conséquences, le moral est au plus bas et la peur de tout perdre du jour au lendemain joue encore plus sur le moral au quotidien.

En attendant des nouvelles qui je l'espère seront positives afin de trouver un terrain d'entente entre les différentes parties, je vous adresse mes sincères salutations.

Mr [REDACTED]

Contribution de M [REDACTED], navire [REDACTED]

Chère Jersey,

Je suis patron pêcheur granvillais depuis 24 ans. J'ai toujours navigué dans les eaux de Jersey, comme l'ont fait de nombreuses générations de pêcheurs français avant moi.

Cette proximité, notre histoire commune et nos valeurs partagées me font considérer nos deux pays comme deux frères qui ont forgé une amitié depuis des siècles.

Depuis les années 2000 je pêche à Jersey des coquillages à la drague et du poisson au chalut. Après 20 ans de mer commune et de stabilité qui convenait à tous, le Brexit a été un coup dur.

Outre les droits de pêche perdus, il m'a fallu plus de 2 ans pour que mon activité dans vos eaux soit reconnue et pour enfin obtenir mes fishing permits. Ces 2 années ont été très dures pour moi, physiquement, financièrement et moralement.

Depuis de nombreuses années, je pêche à Jersey dans les mêmes secteurs dont je connais par cœur les reliefs et les habitats présents au fond. Mes secteurs sont : sud-Est et Est des Minquiers, Est de Jersey et les Arconies.

Contrairement à ce qu'indique les cartes, il n'y a pas d'espèces d'intérêt à protéger dans mes zones de pêche, il n'y a que du sable et coquillages vivants. Je fais d'ailleurs le constat que la pratique de la drague sur le fond permet d'aérer les sédiments, à l'image d'un jardinier qui entretient son jardin. Cela permet d'éviter que les coquillages meurent, bien au contraire, cela favorise les apports alimentaires et la régénération des espèces. Je ne comprends donc pas pourquoi il y a ces zones de protection qui excluent systématiquement les arts traînants. Telles que proposées, ces zones causeraient la mort de nombreux pêcheurs français et jersiais.

J'espère donc que les objectifs environnementaux seront adaptés au regard des enjeux économiques de la pêche artisanale.

Jersey, mes frères d'en face, recevez mes salutations distinguées,

[REDACTED]



Contribution de M [REDACTED], navires [REDACTED] et [REDACTED]

Monsieur,

Je suis armateur du [REDACTED] et je patronne le [REDACTED], deux bulotiers de [REDACTED]. Dans les deux cas, mes bateaux pratiquent surtout la pêche du bulot mais également les crustacés, en particulier l'araignée.

Je travaille toute l'année entre le secteur du Bœuf et le plateau de l'Arconie. Nous avons une activité frontalière, autant dans les eaux jersiaises que normandes. Nous sommes nombreux à travailler dans ce secteur, que ce soit les caseyeurs ou les traînants, il s'agit d'une zone riche et très intéressante pour la pêche. Le fait d'être nombreux et avec des métiers différents provoque des enjeux de cohabitation. Suite au Brexit, entre ceux qui avaient l'accès aux eaux de Jersey et les autres, il a fallu retrouver un équilibre afin de permettre à tout le monde de travailler. Maintenant, vous voulez mettre en place des aires marines protégées, dont une grande dans l'est de l'Arconie. Cela va reprovoquer de forts changements dans les pratiques des traînants car, si je comprends bien, ils ne pourront plus venir.

Concrètement, cela signifie qu'ils vont devoir aller travailler ailleurs. Cela va donc impacter l'ensemble de la pêcherie dans le secteur. Et cela aura donc de grosses conséquences sur les autres métiers : problèmes de cohabitation, moins de possibilités de rotation entre les métiers. Cela va donc avoir un impact sur l'ensemble des entreprises de pêche de la côte mais également sur la ressource : nous ne pourrons plus changer aussi facilement de zone, ce qui risque d'épuiser certains secteurs.

Je suis impliqué dans la gestion de la pêche. Quand c'est nécessaire, je trouve normal de prendre des mesures mais là, je dois avouer que je ne comprends pas l'intérêt de prendre des mesures sur des zones en bon état au risque d'avoir des impacts négatifs sur la ressource.

Selon le document, actuellement seuls les arts traînants sont concernés à part au niveau des Sauvages. Qu'est ce qu'il en sera des arts dormants dans les années à venir ? est-ce que l'interdiction aux Sauvages est un début ? La démarche qui est lancée avec ce document est très inquiétante pour nous, on a le sentiment qu'il vient dans la continuité du Brexit afin de mettre les français dehors.

J'ai toujours travaillé dans ce secteur, jusqu'à présent nos relations me semblaient bonnes, maintenant, j'ai l'impression que nous sommes devenus la bête noire. Pourtant nos pratiques n'ont pas changé, au contraire, des mesures sont prises régulièrement pour diminuer l'effort de pêche. Il est donc difficile de concevoir la mise en place de tels sites et que ces derniers ne contraignent que les pêcheurs.

En espérant un retour à des relations plus paisibles et fluides, veuillez agréer, monsieur, mes salutations distinguées.

Contribution de M [REDACTED], navire [REDACTED]

Bonjour,

Je m'appelle [REDACTED] et j'exerce une activité de pêche professionnelle dans les eaux de jersey depuis juin [REDACTED], d'abord en tant que matelot, puis de [REDACTED] à [REDACTED] seul à bord de mon bateau le « [REDACTED] ». Depuis janvier [REDACTED] mon fils [REDACTED] navigue avec moi dans le but de reprendre mon activité. Nous pêchons principalement le homard et l'araignée de mer au casier, sur le plateau des minquiers. J'ai été un des acteurs du traité de la baie de Granville dont j'ai participé à toutes les réunions préparatoires de [REDACTED] à [REDACTED] puis après sa signature j'ai siégé à son comité de gestion jusqu'à son abrogation en 2020. La collaboration avec les représentants jersiais y fut d'abord hésitante puis constructive puis à nouveau tendue sur fond de Brexit.

En 2000 le traité avait consacré une forte diminution de nos droits de pêche dans les eaux de jersey, diminution largement consentie et en contrepartie de laquelle un système de cogestion de l'espace maritime avait été mis en place.

Dans ce cadre, nous avons d'un commun accord défini les zones d'exclusion des arts traînants à Minquiers et aux Ecréhous, ce qui, tout en répondant aux obligations RAMSAR de Jersey, préservait au maximum nos droits de pêche.

Ce système gagnant gagnant ne semble pas sous-tendre votre projet actuel où la majeure partie des zones que vous proposez à l'interdiction des traînants paraît calquée sur leurs principaux lieux de pêche, alors que, dans d'autres zones, vos cartes de protection et nos cartes d'activités ne se superposent pas.

De plus, il vous semble comme acquis qu'une zone de protection doive absolument exclure les traînants alors que leur activité n'a, jusqu'alors, pas empêché les fonds que vous prétendez protéger de prospérer et que cette activité, TCA oblige, n'a pas fonction à augmenter.

Vous souhaitez, dans un souci de cohérence, relier votre réseau au réseau français d'AMP. Il vous aura sans doute échappé que les activités des traînants n'y sont pas interdites car considérées comme peu impactantes sur les habitats.

Si votre projet devait aboutir en l'état, il constituerait en une forte diminution des droits de pêche de nos plus petits traînants, en les excluant des zones les plus proches de nos côtes, ce qui est contraire à l'esprit du TCA. Cela serait un très mauvais message à envoyer dans un contexte où les braises du Brexit ne sont pas éteintes et où les négociations sur la suite ne sont pas complètement finalisées.

En ce qui me concerne plus directement, vos relevés d'activité des caseyeurs français, pour les crustacés comme pour le bulot, ne montrent pas ou peu de présence dans les parties est et sud-est des Minquiers alors que nous y travaillons toute l'année, aussi bien en dehors que dans la NTZ des Sauvages où malgré une activité régulière depuis des décennies, les espèces que vous dites vouloir protéger semblent prospérer. Espèces qui pour la gorgone, corail d'eau froide, serait plus sensible au réchauffement qu'à la pêche et dont la protection par interdiction d'une pêche peu impactante dans des eaux peu profondes est bien vaine face à l'augmentation des températures. Quant aux brachiopodes ils paraissent, de par leur taille, insensibles à notre activité.

Créer une NTZ dans un endroit si fréquenté, de la taille d'environ 160 terrains de football, pour des motifs si peu fondés semble plus répondre à l'air du temps qu'à une réelle préoccupation de conservation.

En vous remerciant de nous avoir associés à cette consultation, best regards,

[REDACTED].

Contribution de M [REDACTED], navire [REDACTED]

Bonjour,

Je suis armateur du [REDACTED], un caseyeur de Gouville sur Mer. Je pratique essentiellement la pêche du bulot dans le secteur du Bœuf et je pêche également les crustacés : homard et araignées.

Mon activité dans les eaux de Jersey est assez frontalière, je travaille à proximité du plateau de l'Arconie.

Dans votre document, je comprends que la volonté est de protéger les habitats et que les caseyeurs seraient moins concernés. Cependant, sur le secteur des Sauvages, vous parlez de les interdire car les filières abîment les fonds. Est-ce un projet à long terme sur les autres AMP ?

Le fait d'interdire les arts traînants dans de grands secteurs comme vous le proposez dans votre document va avoir de grosses conséquences. Nous sommes nombreux à travailler entre Jersey et la France, nous cherchons à cohabiter dans de bonnes conditions, en se respectent les uns et les autres et en faisant en sorte que le matériel soit respecté. Cela s'est fortement complexifié en 2021 lorsque plusieurs collègues ont perdu leur accès aux eaux de Jersey. Je travaille beaucoup sur la cohabitation entre les navires, notamment entre les arts traînants et dormants. Le fait de retirer encore des zones aux arts traînants va tout déséquilibrer et cela aura des conséquences sur l'ensemble des navires. Cela aura donc également un impact fort sur nos stratégies de pêche et nos possibilités de rotation entre les différentes zones.

La proximité entre Jersey et les côtes normandes est flagrante, nous sommes de proches voisins. Nous avons donc les mêmes enjeux, que ce soit écologiques ou économiques. En tant que pêcheurs, nous avons toujours cherché à assurer une pêche durable, respectueuse de l'environnement. Nous sommes habitués à prendre des mesures mais uniquement lorsqu'elles sont justifiées. Dans le cas des zones présentées ici, je me pose la question : savons-nous si les habitats que vous souhaitez protéger sont en bon état ? il y a-t-il un intérêt de protéger des écosystèmes qui vont bien au détriment d'activités économiques en place depuis des années ?

J'ai l'impression qu'il s'agit d'un moyen supplémentaire de nous écarter des eaux de Jersey. C'est difficile à comprendre quand on voit que les échanges entre pêcheurs ou avec les mareyeurs sont plutôt bons. Nous avons une histoire commune, et de longue date. Nous avons toujours travaillé ensemble et partagé la mer. Il ne faut pas oublier que nous sommes de proches voisins, il est donc important de le prendre en compte dans votre document et d'assurer les échanges entre nos deux régions afin de garantir nos intérêts communs.

Bien cordialement

Contribution de M [REDACTED], navire [REDACTED]

Madame, Monsieur

Je soussigné Monsieur [REDACTED] patron pêcheur à Granville naviguant dans les eaux de Jersey depuis l'acquisition du navire de mon père qui lui-même naviguait dans ses eaux avec son premier bateau (la [REDACTED]) en [REDACTED] puis avec le [REDACTED] de [REDACTED] à [REDACTED] l'année de sa retraite. Mon grand-père naviguait également dans les eaux de Minquiers aux casiers avec son bateau qui s'appelait le [REDACTED] dans les années 1970.

Je suis issu de la 6^{ème} génération de marins pêcheurs. Avant le Brexit, nous pêchions régulièrement dans la partie sud-est, Est, Nord-est des Minquiers, ainsi que dans la partie Sud-est de Jersey particulièrement pour la pêche de la praire et de la coquille Saint-Jacques. Je ne suis pas opposé aux Aires Marines Protégées (AMP). Cependant des petits navires arts trainants comme les notre peuvent pêcher dans les AMP françaises. Pourquoi être d'office interdit de pêche dans les AMP de Jersey ?

Notre chiffre d'affaire dans ces zones y est assez important pour notre entreprise familiale. Si nous perdions l'accès à ces zones telles que proposées par le réseau d'aires marines protégées, cela mettra notre activité en péril.

Nos réglementations régionales antérieures au Brexit nous permettaient une gestion particulièrement rigoureuse dans vos eaux (quota journalier, anneaux de 92mm, jour de pêche avec horaire, fermeture les week-end, ensemencement de cette zone, fermeture biologique de quatre mois et demi du 15 Mai au 1^{er} Octobre).

Cela nous a permis de conforter la ressource qui se porte au mieux, notamment dans vos eaux. Je souhaiterais que vous preniez tous ces éléments en compte me concernant et vous en remercie d'avance.

Je vous d'agréer Madame, Monsieur mes sincères salutations.

Mr [REDACTED]

Contribution de M [REDACTED], navires [REDACTED] et [REDACTED]

Bonjour,

Je suis [REDACTED], armateur du [REDACTED], caseyeur de 10m pratiquant la pêche aux bulots et aux crustacés durant toute l'année, et du navire Le Carteret : navire polyvalent de 12m pratiquant la pêche à la coquille saint Jacques de Octobre à mai, et les casiers de fin mai à septembre. Nous sommes actuellement une petite entreprise 6 Marins, 3 sur chaque bateau, et 3 personnes à terre pour la vente et l'entretien du matériel.

Notre Entreprise a été fondée par mon père [REDACTED] en [REDACTED], travaillant déjà les casiers sur son doris en bois le long de la côte. A partir de [REDACTED] et l'achat du [REDACTED] nous avons commencé à venir dans les zones Jersiaises actuellement A B et C. En [REDACTED] nous avons acheté le [REDACTED] nous faisons la drague l'hiver et les casiers le printemps et l'été, nous travaillons dans les zones A B et C suite au traité de la baie de Granville. En [REDACTED] nous développons l'entreprise avec l'achat d'un deuxième bateau Le [REDACTED] et actuellement le [REDACTED] arrivé en [REDACTED], A cette époque nous travaillons 80% de notre temps dans les eaux jersiaises. En [REDACTED] nous avons perdu le [REDACTED] à un incendie, et en Juin [REDACTED] nous avons eu notre bateau neuf [REDACTED].

A l'origine je faisais partie des rares pêcheurs à pouvoir travailler dans la zone A. Cette zone, nous l'avons maintenant perdue, il y a aussi la zone de protection des Ecréhous qui est maintenant interdite aux traînants. Il y a 3 ans, le Brexit nous a fait perdre beaucoup d'accès et surtout des droits de pêche. Maintenant ce sont les zones de protection des habitats, jusqu'où cela va aller ?

J'ai actuellement l'âge de prendre ma retraite, mon fils et moi aimerions faire perdurer cette entreprise par le futur. C'est pourquoi il doit reprendre l'entreprise derrière moi, comme je l'ai fait avec mon père, vu les circonstances, cela risque d'être très compliqué, à tel point que je me demande si nous n'avons pas intérêt à tout arrêter, quel est l'avenir de la pêche à Carteret si les portes de Jersey continuent de se fermer ? La frontière est à 5 milles nautiques de notre port, nous sommes totalement coincés par les eaux jersiaises.

Nous sommes de petites unités de pêche, nous pratiquons de la pêche artisanale avec des sorties à la journée. Nous travaillons là depuis toujours et la ressource se porte bien, cela montre bien que notre impact sur l'environnement est limité, il doit donc être possible de trouver des solutions. D'autant plus qu'il n'y aurait pas de soucis pour qu'une partie des secteurs soit protégée. Cependant, certaines zones sont des secteurs à enjeux pour nous, il serait donc bien de redéfinir le zonage.

Dans votre document, vous parlez de prendre en compte l'ensemble des enjeux, dont ceux liés à la pêche, j'espère dans ce cas que vous allez identifier l'impact qu'aura la mise en place de tels sites sur notre activité et que vous en tiendrez compte pour la mise en place de vos mesures.

En espérant que vous prendrez ces éléments en considération, je vous prie d'agréer mes sincères salutations.

Contribution of CRPMEM of Normandy to the public consultation on Jersey Marine Spatial Plan

CRPMEM

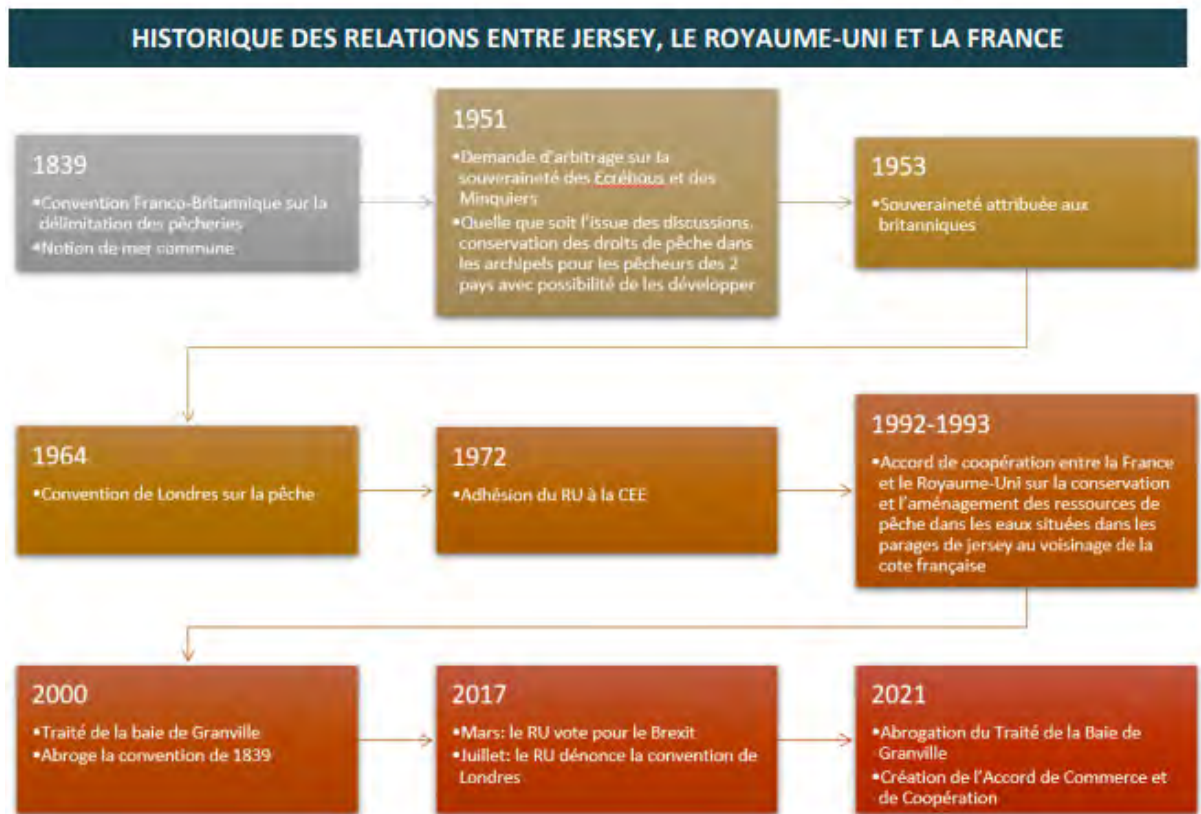
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1. INTRODUCTION

1.1 Why is the CRPMEM of Normandy responding to this consultation?



The Jersey Marine Spatial Plan (JMSP) aims to bring together all the current issues present in the waters of Jersey and to provide a framework for organizing human and marine resources and activities while enabling the development of a network of Marine Protected Areas (MPAs). The CRPMEM of Normandy was invited to respond by the Jersey authorities and, as a professional body, aiming to defend the interests of all Norman fishermen, we wish to make our contribution to this document to remind Jersey of the importance of Jersey waters for Norman fishing and to ask for our due consideration.

1.2. Reminder of the historical relationship between Jersey and Normandy

Jersey and Normandy are strongly linked by history. We were separated in 1204 when France regained possession of Normandy, forgetting the Channel Islands. However, our destinies have always been linked. Norman origins are also very marked in Jersey. In addition, there is the obvious geographical proximity between both regions. At its closest, Jersey is only 12.03 nautical miles (22.2 km) from the French coast.

This proximity has meant exchanges between fishermen for almost two centuries. Several agreements have already been signed: a source of numerous discussions. The latest one was the Granville Bay Treaty which had the particular objective of establishing common management measures concerning fishing in this area.

In the JMSP it is mentioned that this planning exercise will enable Jersey to fulfill its international obligations. In this paragraph, the obligations mentioned concern only the environment, including the 30x30 principle. We would like to remind you that Jersey is also committed to respecting the historic and pre-Brexit fishing rights of French vessels via a new post-Brexit agreement, the Trade and Cooperation Agreement (TCA). In this context, Jersey is committed to ensuring that there are no discriminatory measures and to ensuring that activities are maintained as they existed before Brexit. It therefore seems essential to us that the definition of the network of marine protected areas is done in consultation with French fishermen to ensure they are taken into consideration.

1.3. [Lack of consideration for](#) Norman fishing in the consultation

The CRPMEM of Normandy notes that Norman fishing activities are barely considered in the definition of the proposed network of marine areas. Likewise, the impact and socio-economic consequences of such a network of MPAs on Norman fishermen, in Normandy territory, are not mentioned.

As cited in the MPA Assessment Methodology (Evidence Base document EB/NB/12), since spring 2023, 5 workshops were organized to consult stakeholders identified as essential to the deployment of the JMSP. We deplore that Norman and French fishing, historically present, have not been considered as an important stakeholder. We are all the more dumbfounded as during the consultation workshops, 100% (17/17) of the opinions on the question “recognize traditional commercial fishing zones within MPAs” are favorable. We therefore believe that French fishing, as a traditional activity for centuries in the waters of Jersey, must be considered and that some time to exchange on the subject could have been organized in 2023.

We would also like to know what the question “manage French fishing vessels better” actually means? of which 5/5 opinions are favorable, while French vessels, in Jersey waters, are those subject to the most restrictive regulations.

French fishing represents more than 50% of fishing activity in Jersey waters. The JMSP shows a desire to consider all the present activities, which is why it seems important to integrate representatives of French fishing into the entire process to find the “win-win” solutions, ultimately allowing the environmental protection objectives to be achieved, and to preserve Normandy’s traditional fishing activities.

2. Analysis of environmental diagnostics (Chapter 8)

In chapter 8 (the natural environment and biodiversity) of the consultation document, the variety of existing habitats in Jersey waters is presented. We observe that the waters of Jersey are divided into two large parts: in the West, relatively deep waters with habitats presenting few issues and, in the East, shallow waters where environmental issues are very important.

We first note that the proposed protection zones strongly overlap the fishing zones of Normandy vessels while certain sectors would have less impact on their activity, this is particularly the case for kelp. We are surprised by the distribution of habitats, and we question the studies which made it possible to produce this habitat map (p.95).

Next, the reference documents used for the writing of this chapter lead to some questions. We first note that many were written by the NGO Blue Marine Foundation which describes itself as aiming to restore the oceans following overfishing, one of the world's biggest environmental problems. Norman traditional fishing, with its very strict regulations in the sense of sustainable and responsible fishing, is in no way dictated by overfishing values. In addition, we have questions about the accuracy of the data used to characterize the habitats. Indeed, the MPA Assessment Methodology reveals that the habitat maps of the years 1970 and 1980 were updated in 2019 but with data from 2014. Based on data that has more than 40 years, the updated state of knowledge of habitats is still 10 years behind schedule.

These observations lead us to doubt the scientific rigor and neutrality of the studies used to construct this document.

2.1. Notes on the diagnosis of marine habitats

Three habitats are presented as being of major concern:

- Eelgrass beds
- Kelp forests
- The maërl banks

These three habitats are listed in Annex V of the OSPAR Convention for the North-East Atlantic area. In the MPA Assessment Methodology it is mentioned that a minimum of 30% of each habitat to be protected must be represented in the entire MPA network and that it is flexible depending on the state of

conservation and the surface area of habitats. We note that 100% of eelgrass beds, 89% of kelps and 86.7% maerl are within the proposed MPA network.

Without calling into question the need to protect habitats, we believe that it is possible to fulfill environmental objectives by redesigning marine protected areas whilst taking into consideration the socio-economic issues of French fishing.

2.2. Habitats Methodology

Jersey, like France, aims to achieve 30% of its waters in marine protected areas (MPAs) by 2030. In order to achieve this common objective, it would be interesting to have consistency between the methodologies used by Jersey and France.

For information, the French authorities have a methodology called Fisheries Risk Analysis (ARP) which is not based on a precautionary principle but on a characterization of interactions gear/habitats. Thus, distribution maps of habitats of communal interest are crossed with those of fishing activities (for each gear/metier).

Then from these elements, a risk of degradation is quantified, for this we need to acquire the necessary knowledge on the sensitivity of habitats to physical pressures. This makes it possible to achieve a risk of habitat degradation for each type of gear (1 type of gear /metier).

The last step of this methodology is to estimate the risk of undermining the conservation objectives. This risk is determined from the combination of the risk of habitat degradation, and taking into account the level of concern of the habitat and local ecological parameters/ economic (professional fishing activities¹). From these elements, we can assess a level of degradation: zero, medium and strong. Depending on the level, proposals for regulatory measures are issued and presented to fishing professionals for consultation.

A better understanding of the measures taken on habitats could have been obtained by providing more elements. Indeed, in the documents provided for

¹ Local parameters: state of conservation of habitats, fishing effort, production rate/dependence of vessels, characteristics local equipment, already existing regulations, other relevant elements

this consultation, it is never specified the state of conservation of habitats. The main argument seems to be the extraordinary nature that these habitats present in terms of diversity. It is obvious that special monitoring must be granted to such remarkable habitats.

However, implementing preventive ban measures in economically important areas and having a strong spatial dependence for fishing professionals raises questions. Mainly, when the fishing effort as well as the real impact of fishing gear in different marine habitats are never quantified. The existence of 10 years photographic evidence for the Savages area is mentioned on p.86, but there is no reference to the evolution of habitats. It is probable that in 10 years, changes in the environment would have been seen if the gear used in this area degraded the habitats.

The elements available to us demonstrate habitats in a good state of conservation in historic fishing areas. The presumed impact of these activities therefore does not seem prohibitive for these habitats.

Thus, it could be interesting to provide additional information on the state of conservation of the habitats to be protected as well as to qualify and quantify the real impact of fishing gear on the seabed in Jersey waters.

2.3. Eel grass beds, a herbarium in good condition

In Jersey waters as in French waters, eelgrass beds are present.

On the French side it is mainly present within the Chausey archipelago where the state of the surface of the herbarium has been known for a century, mainly through photographic monitoring which allows us to have a very detailed map of this habitat.

In Chausey, regular monitoring has shown that this habitat is constantly growing. since 1980 (Fournier, 2002, 2008, 2014, 2020; Godet et al., 2009). Indeed, from 164 hectares in 1982 (Godet et al., 2009), the Chausey herbarium covers at least 360 hectares in 2019 (Fournier, 2020). In addition, several studies prove that the regression of the herbarium before the 1980s was linked to the 'wasting disease' and not because of anthropogenic activity. It must also be emphasized that the redevelopment of the Chausey herbarium for 40 years has been carried out in the presence of fishing activities. The evolution of the herbarium can be explained by different factors, notably the natural dynamics of the species which is favored by the establishment of shellfish concessions (Fournier, 2020) but also favorable climatic conditions. A rare phenomenon on the scale of the European coast where most of the eelgrass beds are declining or stable. The surface regression of certain seagrass beds can be attributed to several factors. This habitat is very sensitive to temperature variations and water quality (Arias-Ortiz et al., 2018 ; Ondiviela et al., 2014)

Over the last 20 years, the Normandy Breton Gulf has not experienced a period of intense cold, which could explain the emergence and development of eelgrass beds. It is also necessary note that this is a habitat with high resilience due to the presence of rhizomes. In the Chausey archipelago, no regulatory measures to restrict human activities are in place. They are also not justified given that this habitat is not conducive to the use of mobile gear. The fishermen themselves have put in place good practices which make it possible to reconcile fishing activities and improving the state of conservation of seagrass meadows.

These facts clearly show that this type of habitat is more sensitive to climatic hazards than to fishing activities.

2.4. Kelp forests, a resilient habitat

This habitat was added in 2021 to the list of OSPAR habitats. It is recognized for its role in carbon capture but is not identified as a threatened and/or declining habitat. According to the OSPAR list of threatened and/or declining species and habitats and the 2021 study, *Laminaria* species spp. (which make up the kelp forests of Jersey waters) are not identified as “threatened or in decline” for our OSPAR region. Thus, it is indeed a habitat of strong ecological interest. but in no sense a rare habitat or one whose conservation status is threatened.

Granville Bay constitutes a sector of strong development of these species due to its low depth. Several species of kelp are considered in decline by the OSPAR convention. However, the main factor identified is global warming, in fact, kelp are very sensitive to water warming. But the last few winters have not allowed the water temperature to drop sufficiently. The impact of these warm winters is also being felt by other local species.

From a biological point of view, this habitat has the particularity of exhibiting rapid growth, which allows it to regenerate easily if it is damaged. These algae grow on hard bottoms unsuitable for mobile gear practice (seabed: rocks). It is also thanks to this strategy that kelp have been able to develop in the Normandy-Breton Gulf. Indeed, the region is exposed to significant swell, particularly during storms. The storms have strong consequences on the kelp forests which are uprooted, as seen en masse on beaches post storms. Furthermore, their ability to regenerate easily allows them to redevelop quickly.

It is important to take into account the different parameters having an impact on kelp before taking very restrictive measures on fishing. Fishing is not an adjustable variable. It would therefore be important to start by carrying out an inventory of the species present and reasons that lead to their decline if it exists in an observable and objective manner in order to take appropriate measures.

2.5. Maërl banks, a non-threatened habitat

This habitat is present in all OSPAR regions. However, it is identified as being threatened and/or declining only in the OSPAR III region (Celtic Seas). The Norman-Breton Gulf, therefore Jersey, is located in the OSPAR II region (North Sea in the broad sense). The state of conservation of the banks of Jersey maërl is therefore not threatened. This habitat must therefore be considered differently from other OPSAR habitats.

It would undoubtedly be interesting to carry out additional studies aimed at characterizing more precisely the state of conservation of the maërl. Furthermore, this habitat is already protected at a site level by it's Ecréhous RAMSAR staüs.

2.6. Notes on the “No Take Zone” of the Sauvages Reef.

The Sauvages reef is identified as being very rich. Several scientific monitoring studies have been carried out there, allowing the presence of cold-water corals such as gorgonians (*Eunicella verrucosa*) to be observed. Their growth is slow, which makes them more vulnerable to abrasion. It's a cold-water species present in Jersey at the lower limit of its geographical distribution area. The main factor of risk for this species is therefore global warming.

The rest of the document leads us to believe that these species are also present in many other areas of Jersey waters. In addition, they are not subject to any international convention classification.

An inconsistency of protection issues

We note that the document presents a type of habitat specific to the presence of gorgonians, it is stable hard seabed. The area where the presence of gorgonians is identified in this habitat is the south west of Jersey's waters. According to the map presented, this is clearly the site identified as ideal for the installation of a wind farm. This really raises questions about the real interest in protecting gorgonians in a site like Les Sauvages, which would have a proven impact on Normandy fishing whereas it would be possible to condemn a large area where this species is present.

Absence of neutrality of the author in charge of the diagnosis

In the source documents, we found a report published by the NGO Blue Marine Foundation of September 2023 entitled “A baseline description of the benthic assemblages of Les Sauvages reef, Jersey” (Evidence Document EB/NB/11). First of all, the author, Blue Marine Foundation does not seem to us to be a scientific organization in the sense that it is not neutral but clearly oriented against fishing. Furthermore, in this document, the source data appears to come from observational outputs organized via the Jersey administration. Finally, the fact of having written this report in September 2023 makes us wonder: is this a source on which the JMSP was based, so late in the calendar or is it the other way around?

The species identified are indeed interesting species but remain common in the bay of Granville.

This site also seems identified as being of phylogenetic importance due to the presence of brachiopods (*Argyrotheca cistella*). What is known about this species? When informing, ourselves we realized that it has also been observed in the sector of Herm. Furthermore, given the characteristics of this species, can it really be impacted by fishing gear?

The report also mentions the fishing activity present on the site. We don't understand how this data was obtained. Why is only scallop fishing identified and presented as the only activity in the area? There are also other significant fishing activities such as whelk and shellfish fishing which do not appear in this diagnosis.

Fishing that respects habitats and has no impact

This sector is an important fishing area, whether for potters or dredger trawlers. Concerning the mobile gear vessels, they have no interest in passing over the reef, they circumvent, currently navigation devices have now become sufficiently precise to avoid the reef while working nearby. This probably explains why these species are present and can develop.

→ We therefore cannot support the establishment of this No Take Zone:

- Just based on the elements provided. To justify such measures, it is imperative to base ourselves on scientific, neutral and bias-free studies.
- With erroneous or incomplete fishing activity data.

→ We oppose the establishment of an NTZ based on such weak elements in an area presenting such challenges for Normandy fishing

2.7. The systematic exclusion of mobile gear without concrete proof

We would also like to emphasize the fact that the measures proposed for the network of marine protected areas identified are essentially based on the precautionary principle, and not on locally acquired scientific evidence. Indeed, a recent study published in 2022 by IFREMER consisted of studying the impact of mobile gear on the seabed in the English Channel. This is the IPREM study initiated and carried out by Normandy fishing professionals. This study demonstrated that the fishing intensity of French vessels in the waters of Jersey is weak. In addition, the IPREM report reveals that the potential impact of mobile gear on the seabed in Jersey waters is very little or even zero (figure 1).

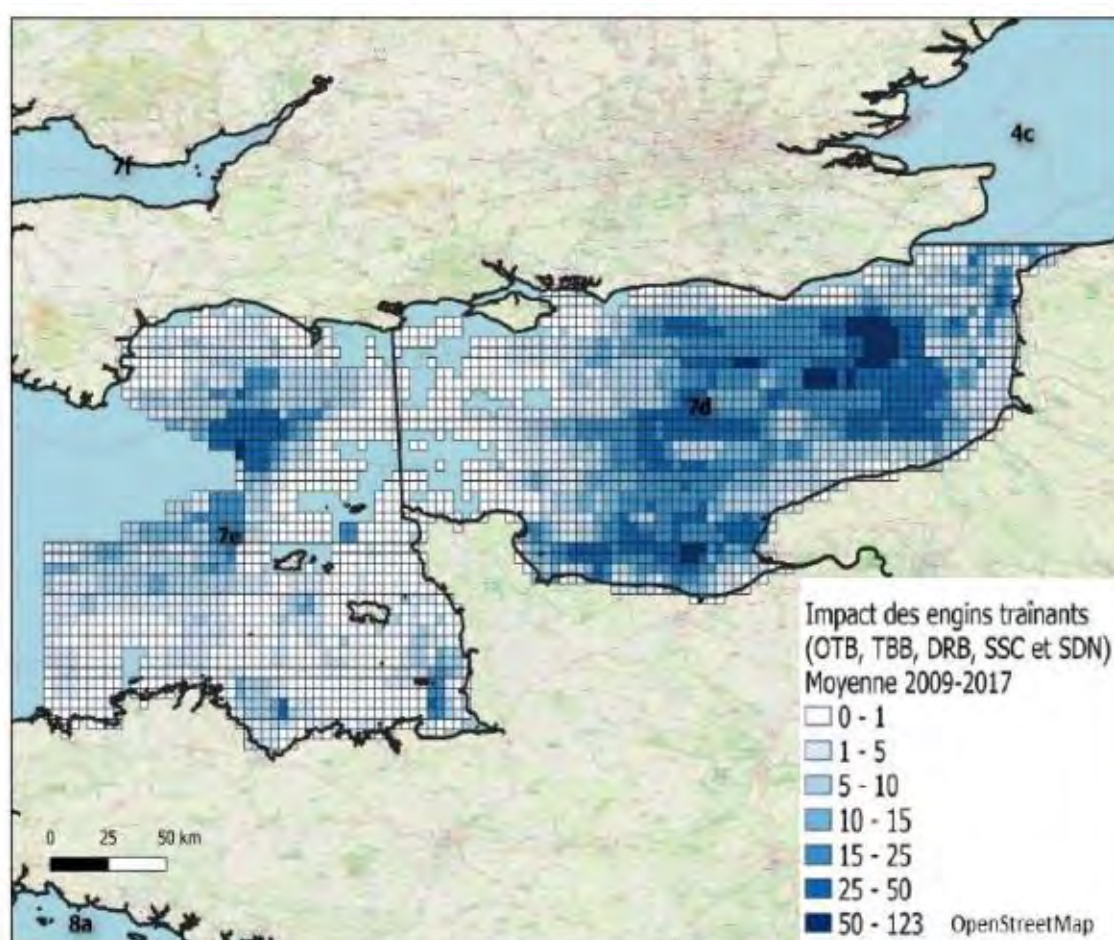


Figure 30 : Impact cumulé des engins de pêche trainant considérant les risques pour les différents habitats et l'intensité de pêche moyenne (= effort moyen) entre 2009-2017 pour tous les navires européens en zones VIIe et VIId, sur une grille de résolution spatiale de 0.05° x 0.05°. L'impact cumulé (= \sum Indice d'impact [engin]) est calculé pour un habitat donné en multipliant le coefficient de risque (R) de l'habitat considéré par l'intensité de pêche moyenne (SAR.an⁻¹) puis sommé pour tous les engins.

Figure 1: Potential cumulative impact of towed fishing gear on different vessel habitats Europeans in VIIth and VIId between 2009 and 2017 (figure 30 of the report)

Although the impact of a gear depends on intrinsic factors to fishing activities (surface area exploited, penetration into the sediment, etc.), it must be remembered that this impact also depends on environmental factors such as the nature of the seabed or the sensitivity of benthic communities to different factors. However, the IPREM project demonstrated that the sensitivity of benthic habitats, and therefore the real impact of a device, remains unknown in the Channel. On the French side as well as the Jersey side, there is therefore a lack of knowledge on this subject. Finally, IPREM indicates that in the Channel, the communities of the seafloor are both resistant to fishing effort and difficult environmental conditions and that the Resistance to these two factors is linked. There is therefore a real need for additional studies to discern the effects that would be linked to the environment, or fishing, as well as to define the real impact on what the different gear could have on the different types of habitats.

It is therefore necessary that the proposed protection zones are based on local scientific evidence, relating to the state of conservation of the habitats with identified sources and levels of pressures that are proven and quantified.

An example of a successful consultation reconciling fishing and environmental issues: Method for establishing Ramsar sites within the framework of the Granville Bay agreements

In 2014, Jersey proposed the establishment of habitat protection sites for maërl and eelgrass beds. This was the first environmental approach within the framework of Granville Bay.

This was the source of numerous debates in order to respond to all of the issues: protecting habitats of proven ecological interest while allowing activities to be maintained. The different steps are presented in the table below:

February 2014	1st contact Identification of the need for consultation
June 2014	Consensus on the need to protect habitats Request for charts sent by Jersey in July 2014
October 2014	Request for details on the issues linked to these habitats by France
February 2015	Report presenting the challenges for the activity of French ships Proposal of new limits
June 2015	Société Jerseyaise is mandated to carry out a study to identify the problem areas
October 2015	Discussions on the scope of future sites
February 2016	Agreement on the perimeter of the Minquiers site Normandy has reservations about that of Ecréhous Request for the return of the report from the Société Jerseyaise to be able to decide
July 2016	Publication of the Société Jerseyaise report Jersey proposes to extend the perimeter in the Ecréhous sector to protect the maërl Proposal for setting up a fallow system
August 2016	The JFA opposes the fallow system and calls for a definitive ban of mobile gear in this sector
February 2017	Agreement on the perimeter of the zone Normandy calls for a ban on scallop fishing (dredging and diving)
September 2017	Publication of the Jersey decree with a ban on trawling and dredging on the perimeter

Through this example, we can see that the exchanges lasted 3 years, but this made it possible to achieve a compromise.

Furthermore, this work promoted the acceptance of such a project by (fishing) professionals.

This methodology should serve as an example for future projects.

3. Analysis of the diagnosis on professional fishing (Chapter 9)

In this part, the CRPME of Normandy is saddened to see that only Jersey fishermen are considered, when the JMSP cites the objective of ensuring that one can continue to earn a viable living as a fisherman. As an example, with this current MPA project, the Norman ship LE STYX would lose 100% of its business, because it only works in Jersey waters and in areas that could become MPAs. In addition, we regret that there is no official reference document about French fishing. We strongly regret that only 2 lines in the JMSP are used to describe French fishing, and yet Jersey waters are so important to French fishermen who depend on these waters.

- “Today there are [...] 137 French Vessels.” (P.130)
- “Jersey’s waters are also fished by French fishermen under the terms of a post-Brexit fishing agreement with the EU.” (P.130)

Then, we note that the JMSP presents a very confusing methodology which does not allow us to know how the activity of French ships was treated. The methodology used is barely described, the mapped fishing activities boil down to the presence/absence of vessels. Furthermore, it is only in the Maritime Activity Assessment (EB/G/22) that the use of VMS data for French ships is specified. Although the Maritime Activity Assessment presents an outline analysis of French fishing activities, **a more in-depth analysis is necessary given the economic issues that exist.**

Furthermore, in the MPA Assessment Methodology, the Minister of the Environment indicates that the development of the network of marine protected areas will be consistent with environmental objectives, **global, economic and social**. The term “global” makes us think that French fishing is considered in the development of the JMSP. Therefore, and within the framework of the TCA, it is necessary to consider French fishing as an economic issue in its own right. The term “global” leaves us also think that the environmental objectives and the challenges for French fishing will be

harmonized with French environmental policies which border the waters of Jersey.

3.1. Current Fishing Trends

Chapter 9.3.1 (Current fishing trends) gives data through volumes landed of the main fish species. Firstly, no regret (no surprise) that this part dedicated to landings and stocks only refers to landing data and that no stock assessment is presented.

Next, we note that the data presented does not correspond to those compiled by the CRPMEM of Normandy from scientific organizations (Ifremer, SMEL).

Indeed, we observe different trends in some species. This is the case for lobster, where the results are estimated as good on the French side (figure 2). This is also the case for scallops where the results of the various surveys show a stock and landings (figure 3) constantly progressing.

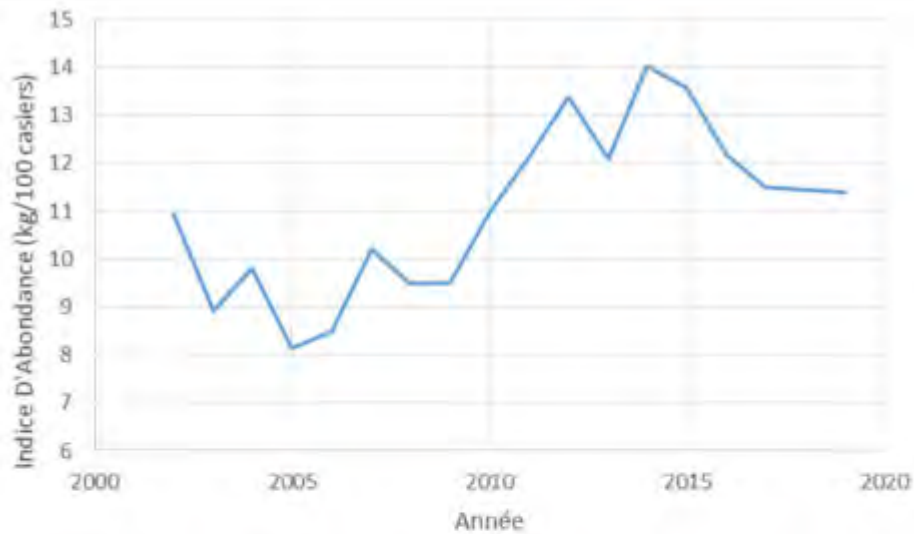


Figure 2 : Evolution des indices d'abondance du homard pour le stock "Homard 7e8a"

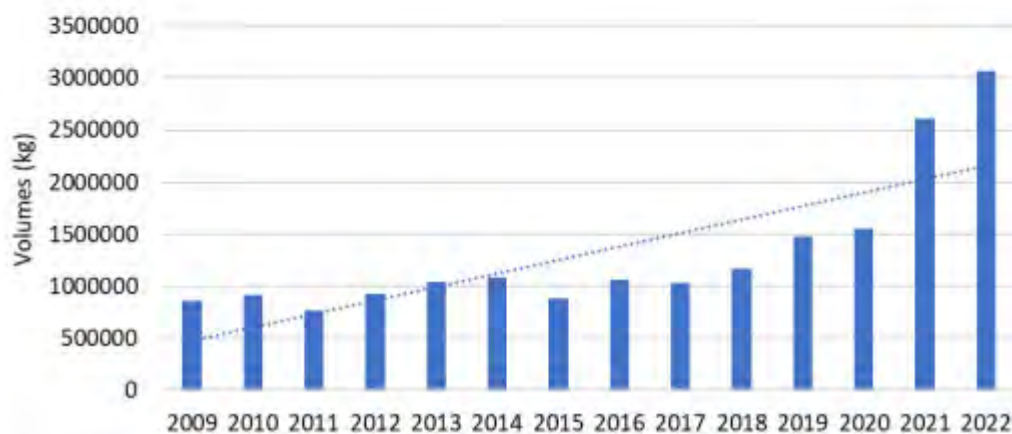


Figure 3: evolution of landings of scallops fished in the Western Channel and landed in Granville – Cherbourg – Saint Malo depending on the years

Marine species know no borders, so we all work with the same stocks. As demonstrated by Nicolle et al. (2017), the stocks of the different scallop shell deposits in the Norman-Breton Gulf are interconnected and dependent on each other to form one and the same stock. In this study, it was demonstrated that the recruitment and therefore the local stock of scallops from southeast Jersey depend largely on local stocks from Saint-Malo and Chausey. Thus, the management measures formerly applicable in Jersey waters, but also the stocking carried out since 2009 strongly contributes to the quality of the stock in the waters of Jersey. It therefore seems all the stranger to us to have contradictory tendencies.

We have a real common interest in ensuring sustainable management of fish stocks in the Bay of Granville, which implies the establishment of coherent work between Normandy, Jersey and Brittany and this in a concerted manner.

3.2. Data used and mapping of fishing activity

In chapter 9.3.2 (Current spatial fishing patterns) on the current spatialization of fishing activities, the description of fishing activities is very succinct. From the way this short section is written, we understand that the mapped activities are those resulting from AIS data, control data and declarative data only for Jersey vessels. In the absence of a complete presentation of French fishing activities in the JMSP, we have consulted the source documents on which the JMSP is written; the MPA Assessment Methodology and the Maritime Activity Assessment. We note that French fishing activities are partially described. We would like to provide you with our comments.

Why have you not presented the methodology used and the data more precisely in the JMSP? In particular on French fishing activities which are mixed in with the activities of Jersey vessels? Furthermore, why have you carried out an analysis of French fishing activities without consulting the French services concerned so that it is as representative as possible? Why was the MPA impact study of the network on fishing vessels not taken up and presented in the JMSP?

An incomplete cartography – Analysis of the description of French fishing activities reference documents :

In the Maritime Activity Assessment, there is an analysis of French fishing activities. We observe that the data used was the year old VMS data, from July 1, 2022 (entry in force of the quarter-hour VMS obligation in Jersey waters for all French vessels) until June 30, 2023. As cited in the document, one year of data is completely insufficient to carry out a fair and precise analysis of fishing activities knowing that the activity of French fishermen contain interannual variability, not taken into account here. Furthermore, at this period and within the framework of the post-Brexit discussions linked to the TCA, we were in the middle of period of negotiations on the definition of the Nature and Extent of the activity. Fishing conditions in Jersey waters were therefore extremely vague. The regulations were fluctuating since the French regulations had to be maintained during the negotiations. It's only February

1, 2023 that the Jersey fishing conditions were published and that from June 27, 2023 (publication of a ministerial decree) that they were fully applied. The professionals were therefore disoriented, in full adaptation phase and cautious in the face of all these rapid changes. As a reminder, the TCA is based on 3 full years, prior to Brexit, between 2017 and 2020. This makes it possible to take into account all activities as well as inter-annual variability.

Therefore, this period (07/01/2022 – 06/30/2023) is absolutely not a year of reference regarding the activity of French ships in Jersey waters.

In addition, it is cited that in 75% of cases, VMS data could be linked to declarative data from the logbook to identify the metier practiced. For the remaining 25% of cases, VMS data could have been connected either to a static gear (engin dormant) or to a mobile gear (engin trainant) but by which one?

Next, in the source document, it seems that a fishing haul is identified from the moment when a vessel moves at a non-zero speed of less than 6 knots. This is actually the method that is generally used. However, the latter was put in place for mobile gear boats, ships initially equipped with VMS. The specificity of Granville Bay is the fact that a fleet of small fishing boats, mainly using static gear, finds itself working in the waters of a third country. Static gear boats do not work in the same way: they turn at zero speed and generally spin (shoot their pots) between 5 and 7 knots, the method used is therefore not representative for static gear. Additionally, it is true that France made VMS mandatory in July 2022, however, given the complex context of the moment, many ships took time to equip themselves. It is therefore likely that this data is not representative of the entire fleet.

Then, the use of VMS as the sole source of data raises serious questions.

To characterize the fishing activities of Jersey vessels, all available data was used by seeking to use VMS, iVMS, AIS data then the FISHMAP surveys carried out by Jersey. It is worth noting these FISHMAP surveys also use the French VALPENA survey methodology. In addition, as the FISHMAP 2017 data was too old, the Jersey fishermen were able to ask during a consultation in March 2023 for an update to this data. New investigations were then carried out to characterize fishing activities over 4 years, from 2018 to 2022. Thus, over 5 years of surveys between 2017 and 2022, the best year for Jersey ships, was selected.

As CRPMEM of Normandy, partner of the VALPENA network, we are (totally baffled) in incomprehension. Why were other, more complete data sources not sought to characterize French fishing activities? Why did you not ask for information from the CRPMEM and use similar data from the VALPENA data for French ships, which have been collected collaboratively over the last 20 years of the Granville Bay Treaty? Why not you not seek to identify fishing activities over several years and retain the best year?

To be able to base itself on objective elements, it is necessary for the JMSP to adopt a similar methodology for the Jersey fleet as for the French fleet by mobilizing the best data available.

Once again, we consider the data used for French ships to be unrepresentative and incomplete. The exploitation of certain sectors has therefore been considerably underestimated, such as for the Savage Reef.

This is why, BEFORE the finalization of the JMSP, it seems essential to us that a study of the fishing activities of French vessels is carried out jointly with professional French fishing organisations.

Impertinent spatial data analysis method

Concerning the impact analysis of the MPA network project on fishing activities, we do not understand why it was not presented in the JMSP especially since French fishing represents a large part, or even the entirety for certain professions, of mapped fishing activities. Furthermore, we do not understand the methodology used to identify the impact of the potential network of marine protected areas on French fishing in the MPA Assessment Methodology. In this last document, this analysis is based on days attributable to mobile gear and static gear to identify their activity within the various proposed marine protected areas.

We do not understand the logic of allocatable days for static gear. Under the TCA, Fishing days were allocated only to mobile gear and not to static gear.

Next, Jersey recognizes that MPAs lead to a transfer of existing fishing zones to others. Environmental issues are then shifted to other areas, which is counter productive. Jersey therefore recommends that the impact of MPAs on fishing vessels

be documented to avoid this problem. We also identify a risk of postponement of activity which could significantly deteriorate adjacent areas, which is a shame given that the overall impact remains moderate and the habitats are in good condition.

The MPA Assessment Methodology also indicates as an objective that the MPA network must minimize the impact on the fishing economy and it is recommended to carry out an assessment, vessel per vessel, of the consequences of marine protected areas once the JMSP is finalized and published. The analysis of the socio-economic consequences is essential but must take place during the process of consultation and establishment of marine protected areas.

What is the aim of this retrospective approach? Is it foreseeing that based on the results of the impact of fishing activities there will be a questioning of the proposed areas of the JMSP?

What is the benefit of an individual approach to fleets?

How to minimize the impact on the economy when the areas proposed for the ban are modelled on the areas frequented by Norman fishing vessels? Why carry out this impact study only after finalization of the JMSP and not before?

We ask that this study of the socio-economic consequences on fishing vessels French is carried out BEFORE the finalization of the JMSP and in collaboration with the professional French organisations.

3.3. Counter-analysis of the fishing activity of Norman ships

Given the weakness of the diagnosis of Normandy fishing activities, it is essential that the elements that we provide below complete it and their integration is the subject of an exchange between us.

A highly regulated Normandy fishery meeting the challenges of sustainable management

Norman fishing vessels have worked in Jersey waters for centuries and continue to do so to this day. Today, the main activities are divided into two types of professions:

- Static gear: shellfish pots, whelk pots, nets and line fishing

- Mobile gear: scallop dredges, clam and sea almond dredgers, dredges bivalve trawl, bottom trawl, beam trawl, pelagic trawl, beam trawl

Depending on the métiers practiced, the fishing strategies of each vessel differ more or less depending on regulations, seasonality, the species fished and its availability, the distance from the port.

This variety of métiers and practices creates a balance compatible with the sustainability of stocks, which also implies that the preservation of habitats on which fish species depend no longer needs to be demonstrated (proven).

In addition, Normandy fishing regulations are among the strictest and make it possible to support or even improve stock status. Taking the example of scallops, the self-imposed constraints by professional Fishermen mean shorter fishing times which fully contribute to reducing the impact of mobile gear on the seabed in a spirit of responsible and sustainable fishing.

A spatialization of the VALPENA data from Norman fishermen in the area

Valpena methodology: In their mission to defend the interests of professional fishermen, the fisheries committees need to have knowledge of the activities of their vessels on a scale consistent with that of projects for new activities at sea, the fisheries committees have set up a tool for spatializing these activities. VALPENA stands for the eVALuation of fishing activities (PEche) with regard to of New Activities (VAL-PE-N-A) thus originates from a common desire of the fisheries committees to provide standardized geographic data and elements quantified according to a scientific method established to characterize the activity of professional fishing vessels on a fine spatio-temporal scale (grid of approximately 3 nautical miles per side). The scientific approach underlying the entire VALPENA methodology is based on the activity of the Scientific Interest Group (GIS) VALPENA and the 'Géolittomer' laboratory of the UMR-LETG in Nantes, guarantors of the integrity of the survey protocols and methods of using the data produced. VALPENA data is collected by direct individual surveys of fishermen to year n-1 (last full year). Each fisherman

declares the activity of his vessel(s) per month, by gear and by target species on a grid scale of approximately 3 nautical miles per side.

The data used in this report comes from VALPENA data from surveys for the year of activity 2020. The time allocated to carry out this return unfortunately did not allow us to carry out a multi-year evaluation which would nevertheless be necessary.

Generally speaking, the waters of Jersey are frequented all year round by Norman ships (figure 4). Figure 5 presents the intensity index, i.e. the total number of months worked per grid. We can see that the Norman ships worked mainly in the eastern part of Jersey waters, close to our border. We can also see that a significant part of the future Jersey marine protected areas are located in areas often frequented by Normandy ships.

Indice de Fréquence tout métier confondu

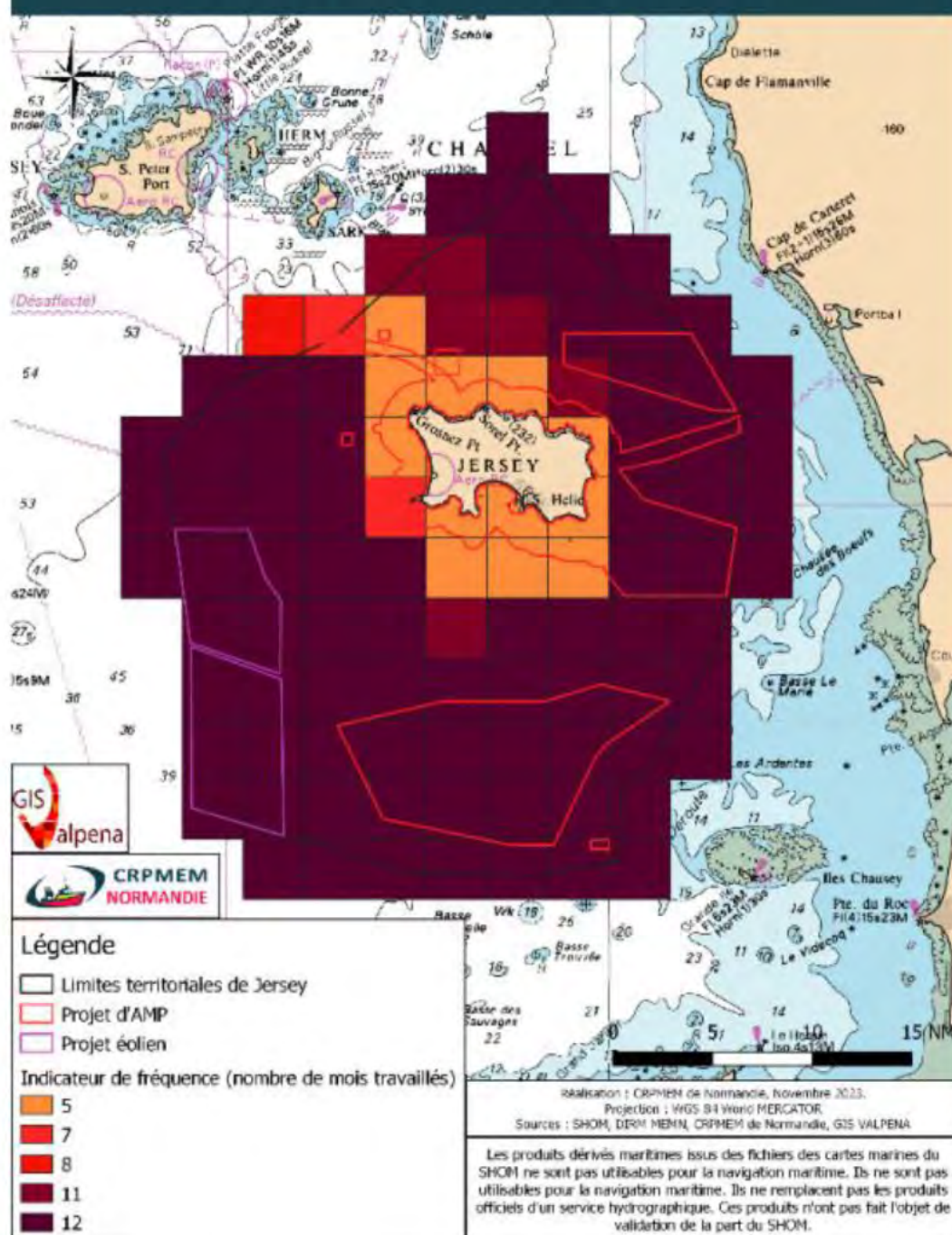


Figure 4 : Indice de fréquence (nombre de mois travaillés) pour les navires normands, tous métiers confondus

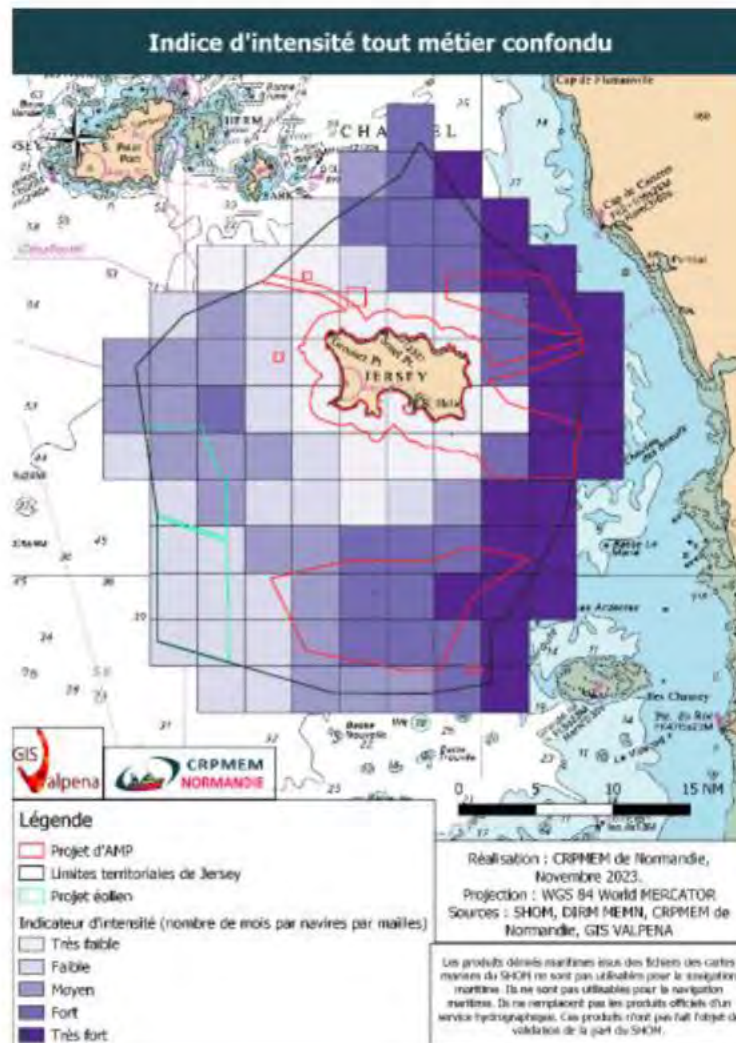


Figure 5 : Indice d'intensité (nombre de mois x navires) des navires normands, tous métiers confondus

Shellfish pots

The main targeted species are lobster, spider and crab (on a more timely basis). Recent reports indicate that lobster is doing well globally.

It is a territorial species, which lives on rocky bottoms where it can hide and feed. We have identified two sectors where lobster is particularly targeted: Minquiers and Ecréhous. Fishing for this species is done using pots.

Spider fishing is carried out mainly by pots for Normandy ships. We identify several fishing strategies for this species. There are moussettes, juvenile spiders which are highly valued, which are the subject of a specific fishery on the Cotentin coasts. They are seasonally present and are very mobile. Fishing therefore begins in the waters of Jersey during the month of March and moves towards the French coast, it generally ends during the month of June. Large males are also targeted for much of

the year. In 2020, 50 Normandy vessels, now granted access to Jersey, held a Fishing license allowing Crustaceans. Among them, 39 participated in the Valpena surveys, which is 78% participation.

The Valpena density indicator shows us the crustacean activity located mainly in the eastern part of Jersey waters (figure 6). We clearly find the rocky bottoms (Ecréhous, Arconies, Minquiers) but also the sandy bottoms located between these sectors and which correspond to areas for spider crab fishing.

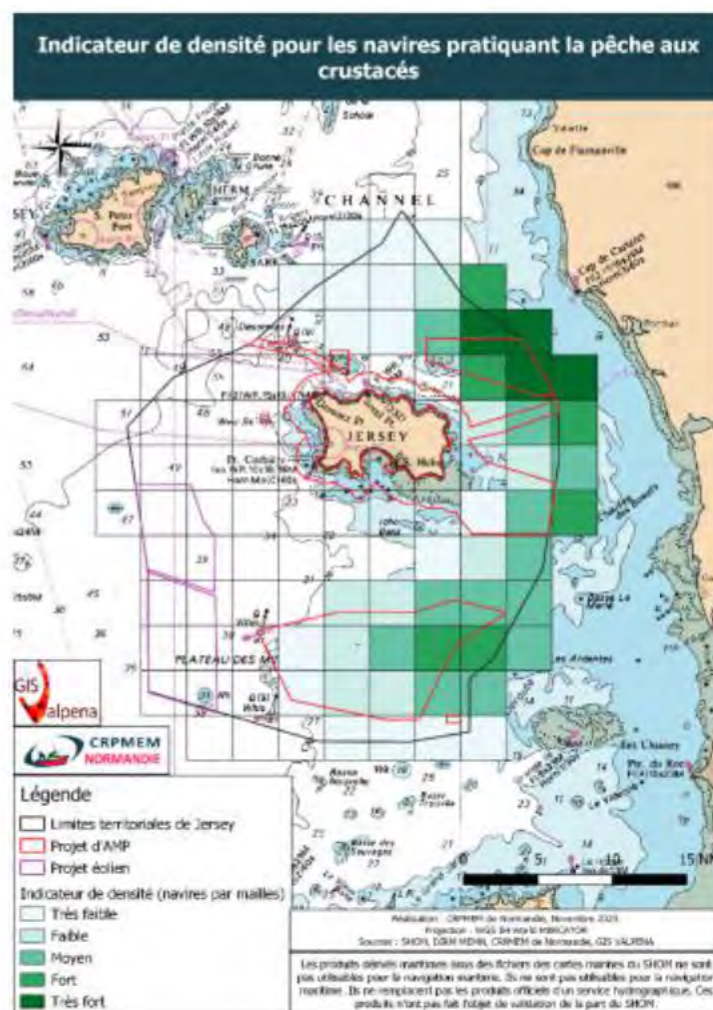


Figure 6 : Indicateur de densité (nombre de navires) pour les navires normands pratiquant la pêche des crustacés

The Ecréhous sector is frequented throughout the year, the Minquiers are frequented mainly from February to September. The strip between the two archipelagos is mainly frequented by March to July, which corresponds to the period of high production for the spider crab.

Whelk box (*Buccinum undatum*)

The whelk is an emblematic species of Granville Bay. It has been the subject of monitoring for many years, which allows us to have a lot of data on it.

In 2020, 49 Normandy vessels holding the whelk Ouest-Cotentin license were active in the waters of Jersey. Among them, 34 participated in the Valpena survey, which is 69% participation.

The Valpena density indicator shows us whelk activity located mainly in the Eastern part of Jersey waters (figure 7). Here we find an activity practiced on loose sediment and in proximity to rocky bottoms. The areas of highest attendance are located between the north of the Sauvages and the south of Ecréhous as well as in the northern part of Jersey waters.

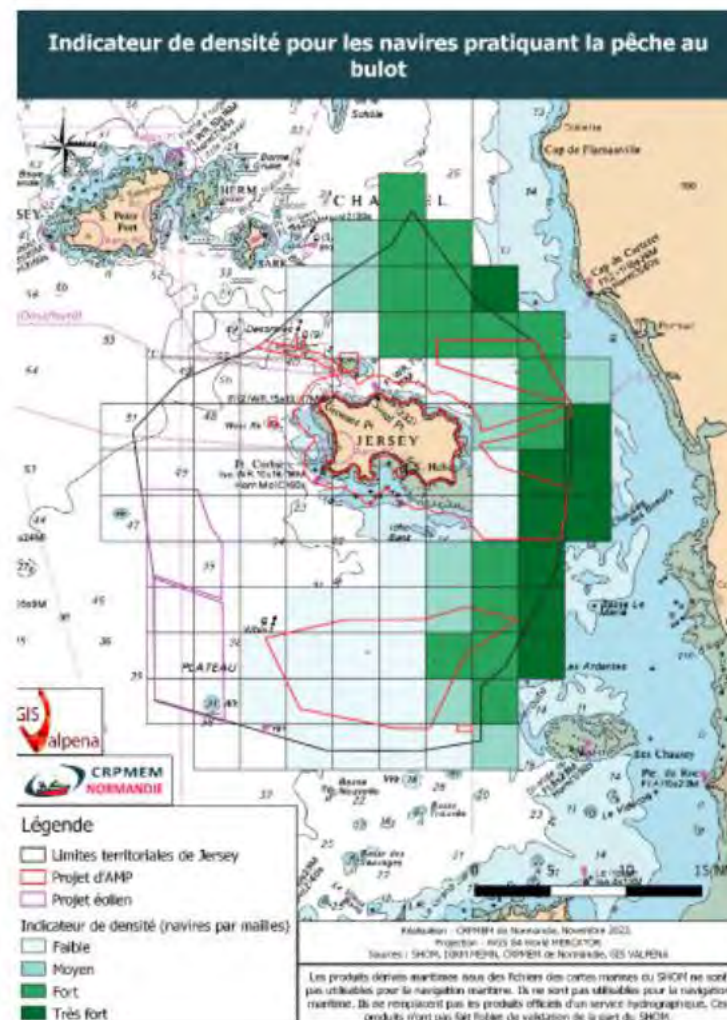


Figure 7 : Indicateur de densité (nombre de navires) pour les navires normands pratiquant la pêche du bulot

The activity is regular throughout the year (except in January when fishing is closed). We can also identify three major fishing sectors: Les Sauvages, Les Arconies and the north of Les Ecréhous.

Mobile gear

As part of the TCA, Jersey has chosen to allocate a number of days to mobile gear vessels in their waters, in order to take into account the versatility of these vessels. It is true that many of them can use several métiers on the same trip.

Concerning the data from the Valpena surveys, 17 vessels responded in 2020 out of the 27 concerned, or 63%. This allowed us to identify the most frequented areas (figure 8).

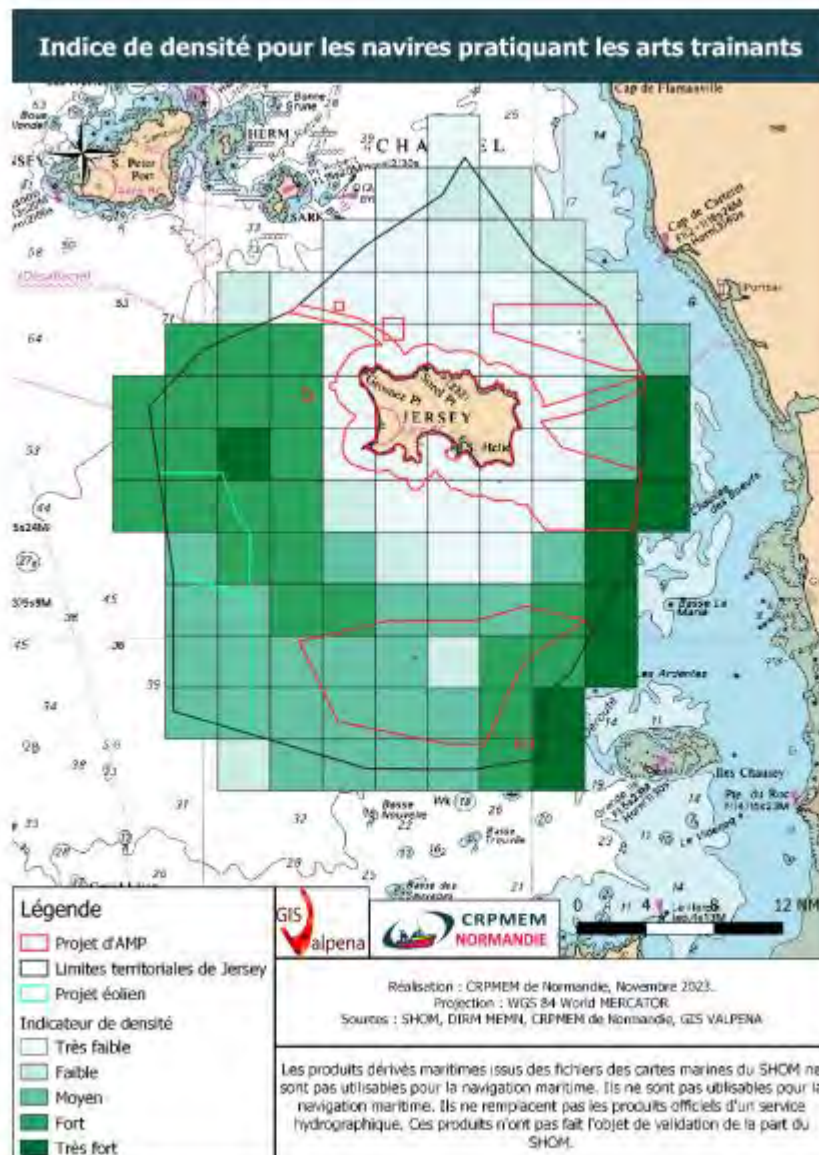


Figure B : Indicateur de densité (nombre de navires) pour les navires normands travaillant aux arts trainants

We can observe that a large part of the waters of Jersey are worked by mobile gear boats. The areas mainly worked are the West of the island and the entire eastern part of Jersey waters border with Normandy waters.

In the West, trawl and scallop dredge activities are carried out. On the eastern strip of Jersey waters, we find trawling and scallop dredging and clam and sea almond dredges. These professions are mainly practiced in the southern and eastern sectors of Minquiers, Les Sauvages and east of the Arconie plateau. This is explained in particular by the fact that these areas are sheltered from the prevailing winds, therefore more accessible areas.

For economic reasons, fishermen seek to limit their travel time, working in Jersey waters is not an end in itself but the response to a fishing strategy in

order to find the balance between production and costs. These sectors are therefore essential to the economic maintenance of businesses.

The JMSP also specifies in its methodology that it seeks to find a balance between the ecological, economic, social and cultural issues. As such, the JMSP follows the marine space planning methodology indicated in the 'UNESCO Global International Guide on Marine Spatial Planning'. This guide indicates that the stakeholders to be considered in the consultation may be foreign stakeholders. As such and in view of the importance of French fishing in the waters of Jersey, it seems essential to us that French ships be considered and that their representatives be consulted unless they have been consulted during the year 2023.

Furthermore, the TCA is rarely mentioned in the JMSP, only twice out of ten lines in the part 4.2.4. The TCA still commits Jersey to respecting the precedents and historical activity of French ships in its waters. During its only appearance, the JMSP recalls precisely this obligation to respect the TCA.

The fact of prohibiting sectors widely used by French ships is therefore contradictory with the TCA since at no time were French fishing activities considered and at no time has Jersey sought to create a consultation dialogue to define marine areas protected areas excluding certain fishing activities.

4. Reaction to the proposed no-go and fishing zones (Chapter 9.4)

The proposed zones correspond to the recommendations made in chapter 8. The data from frequentation of Norman ships in Jersey waters clearly shows that certain areas proposed represent sectors with high stakes for Normandy fishing.

After reading the MPA Assessment Methodology, we discovered that by 2030 Jersey will offer new additional protection zones in order to achieve 30% marine protected areas (figure 9).

In the figure below we can thus observe the priority areas to be extended as MPAs, when additional work will have to take place.

Firstly, we strongly regret that the intention to extend the network of MPAs around the areas currently proposed is not transparently displayed in the JMSP. It seems to us important that the perimeters currently proposed be appreciated in the light of all the goals.

Secondly, we note that despite the lack of recognized scientific knowledge, areas envisaged for the future are again found exclusively in the eastern part of the waters of Jersey. To the extent that MPAs appear to be associated with a systematic ban on the practice of dredging and trawling or even any fishing, the consequences of the network currently proposed followed by an extension of this network only in the fishing zones of Normandy vessels is extremely worrying.

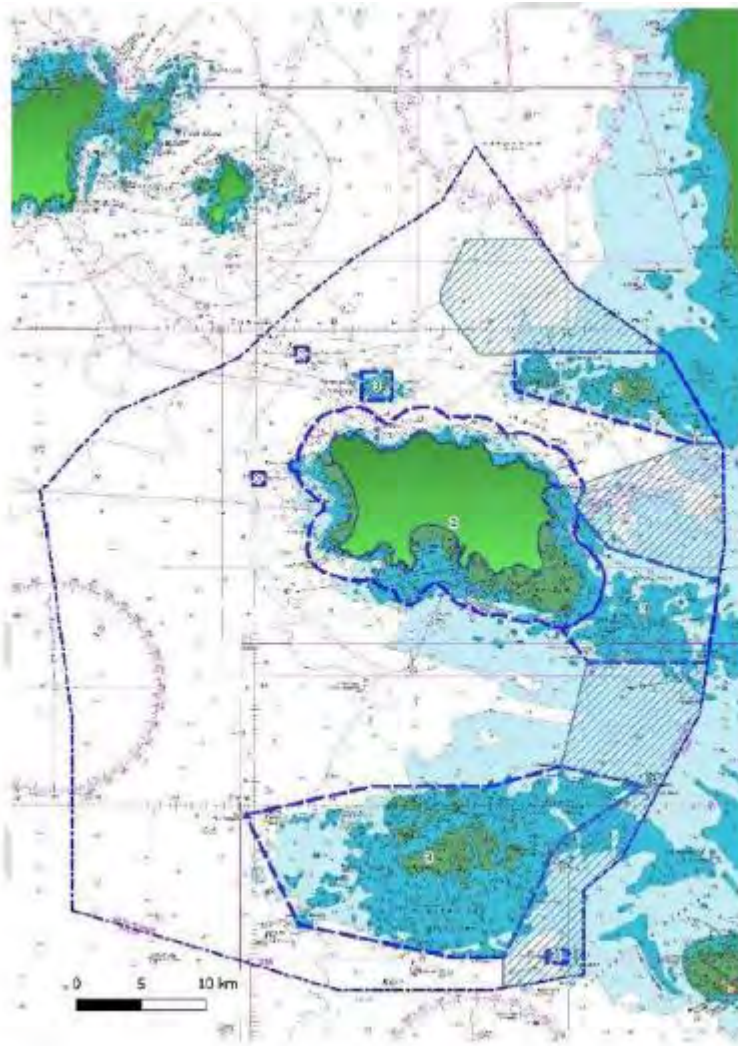


Figure 9 : Zones d'extension potentielle des AMP jersiaises (source : MPA assessment methodology)

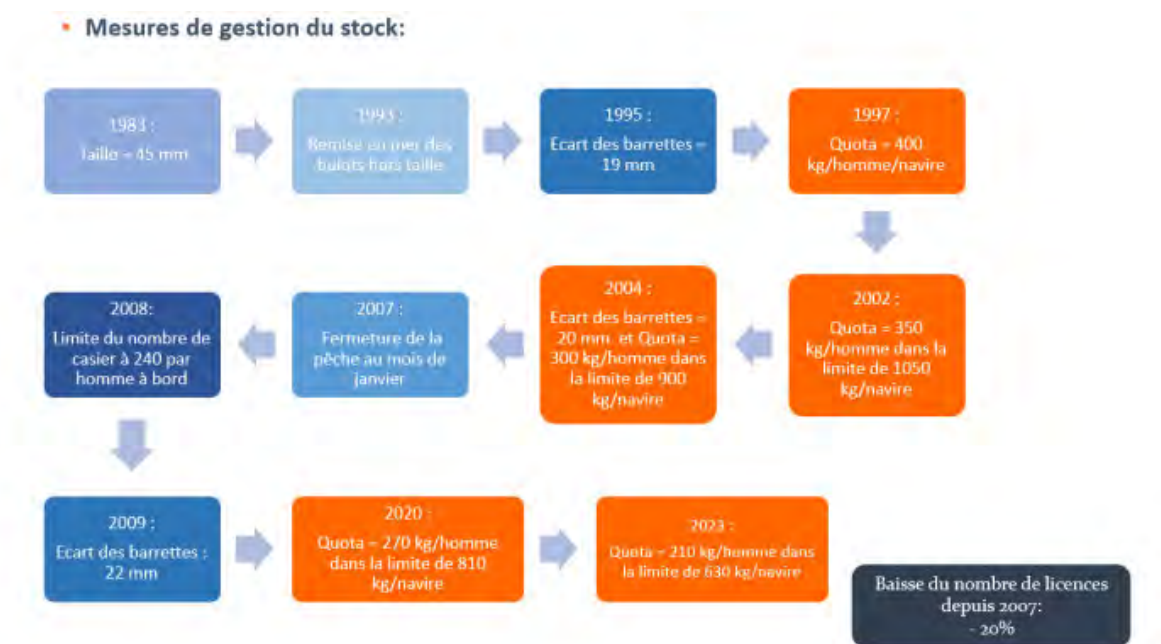
In this context, it would be wise to review these perimeters in order to find solutions that allow you to fulfill the objectives of the JMSP, namely the protection of critical habitats, the achievement of the objective 30% protected areas by 2030 but also the sustainability of existing activities.

5. An incomplete repository of sustainable fishing initiatives even though they are numerous (Chapter 9.7)

First of all, this paragraph does not mention the measures and labels already in place, which is regrettable. We would like to remind you that fishing is already regulated, whether on the French or Jersey side. With an objective of sustainable management, numerous measures have been put in place. There are two levels of regulation: at a European level for species monitored by ICES (generally speaking these are fish and selachians) and at a regional level for other species (shellfish and crustaceans).

For the latter, it is the fishermen, via the Fisheries Committees, who put in place measures based on fishery monitoring, to ensure sustainable and economically viable fishing.

The West Coast of the Cotentin is also an example of long-term management with monitored species and management over a very long time, this is the case for whelks for which the first management measures were taken in the 70s! If we take the example of this species, it has been the subject of numerous management measures taken over the years (see diagram). These measures aim to perpetuate the fishery and adapt it as best as possible to resource conditions.



In 2023, the reduction in the number of Normandy licenses made it possible to reach a total number of 65 licenses. Among them, 45 were associated with access to Jersey waters.

It is also important to remember that Jersey's waters have benefited from all the Norman management measures, these management measures until 2021 within the context of the common sea (la mer commune). In this mer commune context, a good number of common measures could be taken through the Granville Bay Treaty. This made it possible to ensure consistency in water management across the entire fishing fleets. Figures 10 and 11 present all the measures that have been taken jointly over the last thirty years.

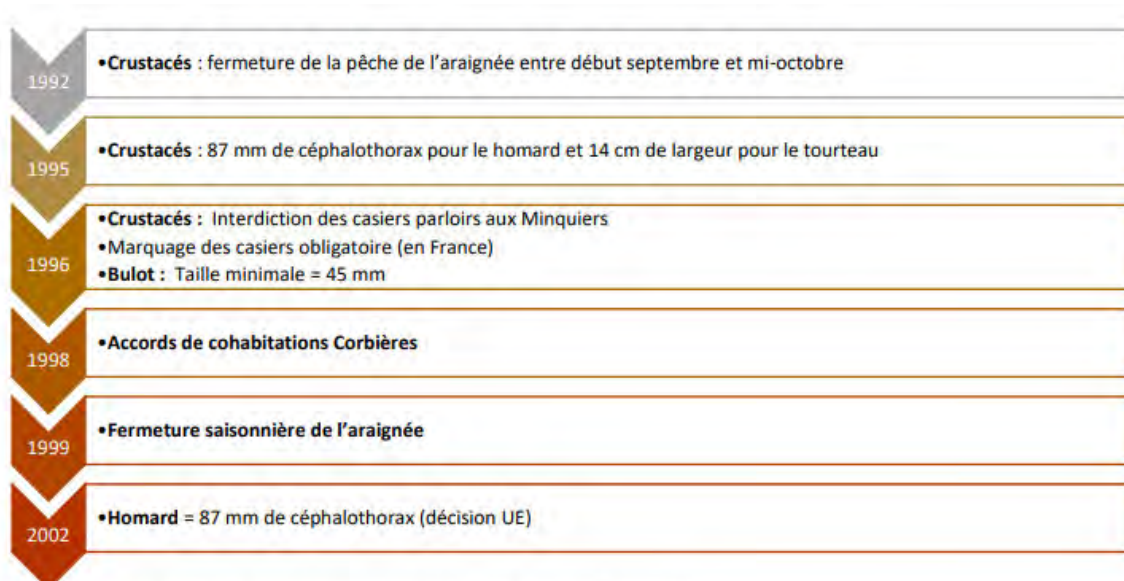


Figure 10 : Mesures communes prises avant la signature du Traité de la baie de Granville

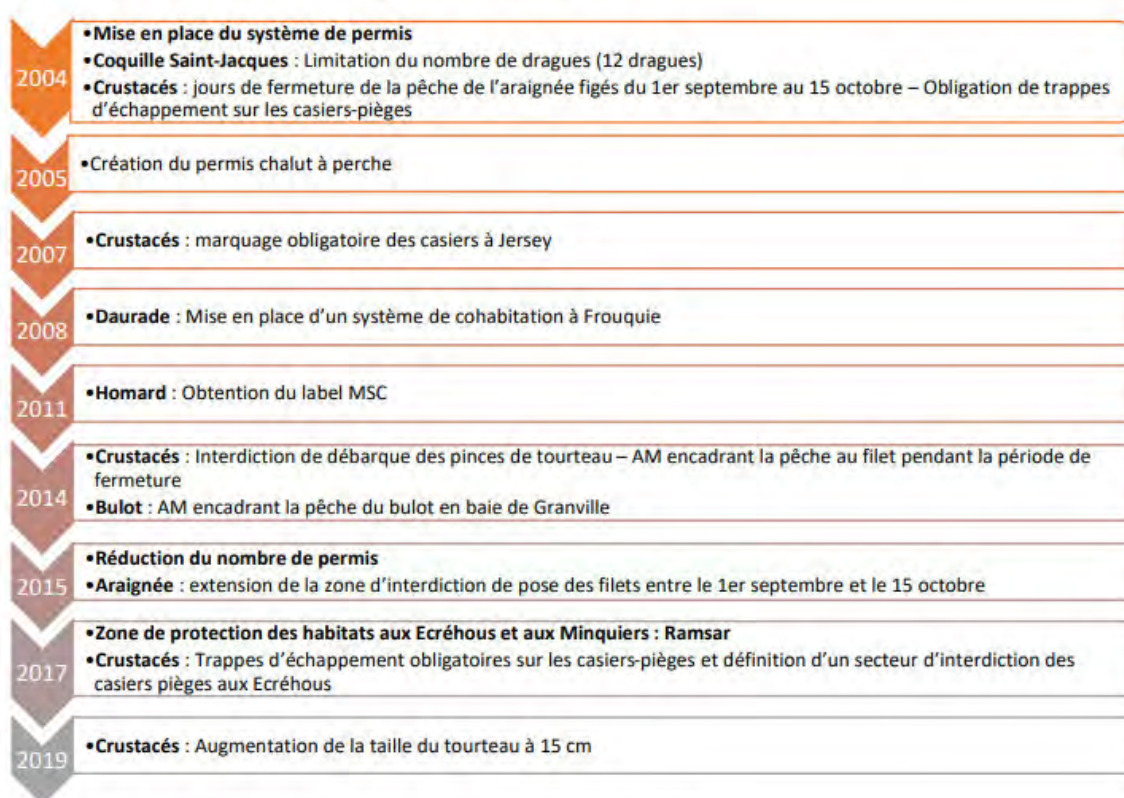


Figure 11 : Mesures communes prises après la signature du Traité de la baie de Granville

The establishment of this common management, even if it remains subject to improvement, has made it possible to achieve coherent measures at the scale of local stocks which are compatible with their life cycles and biology.

In addition, the measures put in place on shellfish pots make it possible to respond to certain objectives of the JMSP concerning ghost fishing: these pots have the

particularity of continuing to fish a significant quantity when they are lost, the fact they are banned in the Minquiers and the Ecréhous (figure 12) therefore makes it possible to significantly limit the impact linked to ghost fishing.

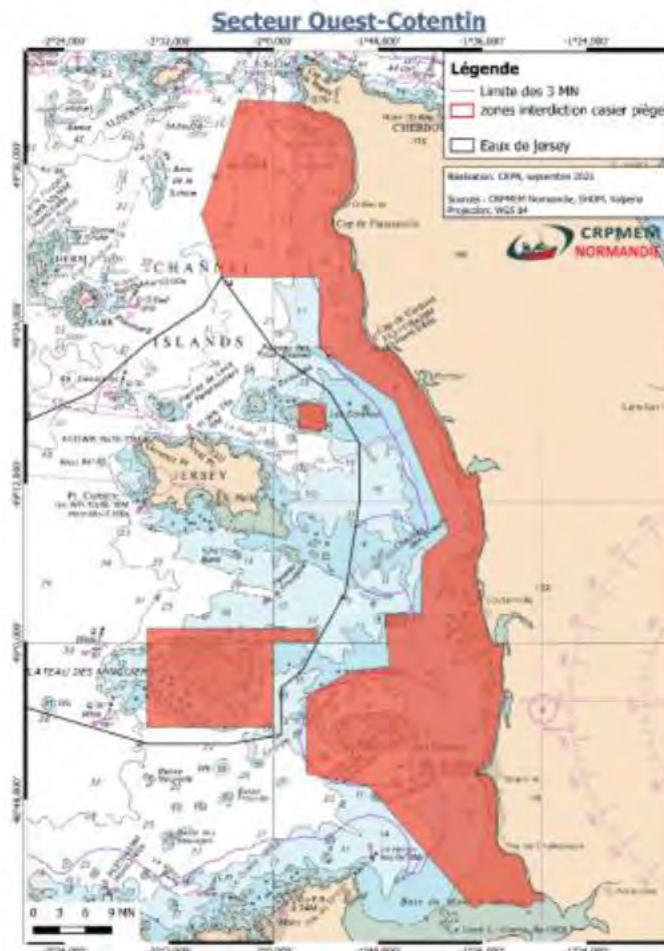


Figure 12 : Zones d'interdiction des casiers pièges

Furthermore, the fact that escape hatches are now obligatory on all the parlour pots (and on all the shellfish pots on the Normandy side) allows sorting to be carried out on the seafloor and not on the deck. Undersized lobsters therefore no longer have to suffer from being thrown back into the water column where they are vulnerable. In addition, this allows small lobsters to come out more easily, therefore limiting the risk of cannibalism within the pots.

These measures also made it possible to obtain the MSC label for lobster in 2011. This label has the particularity of being shared between Jersey and Normandy, which is unique. This represents more than 10 years of certification. This is a joint management model that has borne fruit. Obtaining and maintaining this label, renewed in December 2023, shows the common commitment to move towards

sustainable fishing, this has also allowed a strong improvement in knowledge on the state of this stock.

We have every interest in continuing to work in this direction and working together to guarantee the sustainability of fisheries. We would like to remind you that we work on common stocks, unaware the border, we therefore have the same issues.

6. Summary: A request for co-construction

As a professional structure aiming to defend the interests of traditional Norman fishing, the CRPMEM of Normandy wants to contribute to this consultation document with the aim of pointing out the importance of Jersey waters for Normandy fishing, and the need for this to be taken into account. Over the years, Norman fishing vessels have continually lost rights in Jersey's waters (table 1). This is associated with a feeling of injustice among professionals who do not understand the loss of rights while their fishing practices constantly evolve in the direction of more sustainable management and a reduction in fishing effort.

Tableau 1 : Evolution des modalités d'accès dans les eaux de Jersey

Date	Événement	Impact sur la pêche normande
1951	Accord entre la France et l'Angleterre de préservation des droits de pêche	Dans le cadre de l'arbitrage, quelles que soient les décisions du tribunal, il n'y doit pas y avoir d'impact sur les droits de pêche français ou jersiais
1953	Arbitrage sur la nationalité des Minquiers et des Ecréhous	Attribués à Jersey Pas de conséquences sur les droits de pêche
2000	Traité de la Baie de Granville	Mise en place des zones A, B, C, D, D1 = perte d'accès pour certains navires Limitation du nombre de navires Passage aux 3 MN de la laisse de basse-mer
2017	Mise en place des zones RAMSAR	Interdiction de pêche dans les Minquiers et les Ecréhous pour les arts traînants
2020 - 2023	Fin du Traité de la Baie de Granville Signature du TCA Négociations post-Brexit	Perte accès : navires ayant travaillé moins de 11 jours sur la période d'antériorité, plafond de jauge et de puissance Perte de zones de pêche : Zones frayères à daurades Perte de droits : Mise en place de Nature et Ampleur de l'activité, mise en place du nombre de jours
2024	Mise en place du MSP ?	Grosse perte de zones de pêche

We would like to remind you that French fishing represents a significant part of fishing activity in Jersey waters and has been doing so for centuries. While their fishing rights have been significantly reduced by Brexit, and the post-Brexit negotiations are still not finalised, this new regulatory layer risks putting a terrible strain on already weakened fishing businesses. This therefore involves taking them into consideration as well as the economic issues associated with it.

We are not opposed to the protection of habitats when it is necessary, this approach also exists on the French side, however we believe that it is possible to achieve the stated environmental objectives whilst preserving Normandy's traditional fishing activities.

Below you will find our comments and requests regarding the JMSP:

- The JMSP does not take sufficient consideration of the TCA even though it is an international agreement just like environmental conventions. **We ask that sufficient means are put in place to respect the TCA.**
- Despite the historical presence of French fishermen in Jersey, despite the recommendations of UNESCO planning guidance followed by Jersey, despite 1 year since stakeholder consultation were held, despite the number of joint meetings in 2023, **we are deeply saddened that French fishing was not considered as a relevant party and that we were not consulted earlier in the process.**
- We regret the surprise when we discovered, in a reference (supporting) document, the intention to expand the MPA network by 2030 around the currently proposed areas. We would have liked this intention to be displayed transparently in the JMSP, especially since **these are only areas in the East of Jersey, and therefore fishing areas for French ships, just like the areas already proposed.**
- Submarine cables must be buried or protected to allow all fishing activities (mobile and static gears) to continue.
- → We question the validity of the data, its scientific basis and the neutrality of the analyses presented because:
 - The description of habitats is based on non-scientific documents: the NGO Blue Marine Foundation is an anti-fishing NGO. **We would like studies to be carried out by local scientific organizations.**
 - The proposed measures are based solely on the precautionary principle: **This is not acceptable.**
 - The proposed measures **systematically exclude mobile gear**: This is not acceptable. The example of French MPAs shows that the impact of mobile gear is first evaluated before any proposals for adjusting measures (adjusting protection boundaries).

Regarding habitat assessment

- 40 year old data for habitat mapping has been updated with data from 2014. This data used dates back 10 years. Habitats may have evolved. **You must update your knowledge with recent scientific studies.**
- The state of conservation of the habitats has not been taken into account. **To be consistent with the French work, and to adjust the necessary conservation measures, we hope that the state of conservation of habitats will be considered.** For example, French MPAs make it possible to protect only necessary areas.
- The qualification and quantification of the real impact of fishing gear on habitats is not evaluated in the Channel. The level of degradation of gear on a habitat is unknown. **You need to acquire more knowledge.**
- Habitats may be affected by the environment, fishing, or both factors jointly. Currently, there is no knowledge to differentiate the origin of the effects on habitats. **You need to acquire more knowledge before taking any measures.**
- It is recommended to protect at least 30% of each habitat but this varies depending on the surface area and state of conservation of habitats → currently, it is proposed to protect 100% eelgrass beds, 89% of kelp and 87% of maërl. **It is therefore possible to find a happy medium to reconcile habitat protection and fishing activities.**

→ We hope that fishing is not an adjustable variable to be sacrificed solely for the sake of fulfilling the objectives announced. Likewise, we do not want measures to exclude fishing activities taken even though a habitat has a classification as a 'good state of conservation', this would suggest that the objective is excluding fishing rather than really protecting a habitat.

On habitats of high interest:

- Eelgrass beds: the example of Chausey shows a resilient habitat with constant development since 1980 while there are no restrictive measures on fishing activities. The impact of fishing is therefore negligible: **You need to monitor the evolution of seagrass beds in Jersey.**
- Kelp forests: According to OSPAR, the conservation status of this habitat is not threatened in Jersey. These forests are not frequented by mobile gear boats because they are unsuitable for fishing in this area. The description of species making up

these forests is imprecise: the priority is therefore to identify their composition, and their state of conservation.

- Maërl banks: According to OSPAR, the conservation status of this habitat is not threatened in Jersey. It would therefore be interesting to identify what the conservation needs really are before take ultra-restrictive measures with an important economic impact.

- The “No Take Zone” of Les Sauvages

- o Designation based on a study produced by an anti-fishing NGO itself based on elements produced by the Jersey administration and not on objective documents and neutral scientists.

- o The presence of slow-growing cold-water corals shows that fishing activities present in this sector do not have direct interaction with these species.

- o No details on the potential interactions between fishing gear and brachiopods whose size itself constitutes the best protection.

- o What is the real ecological value of this reef compared to other areas of the waters of Jersey?

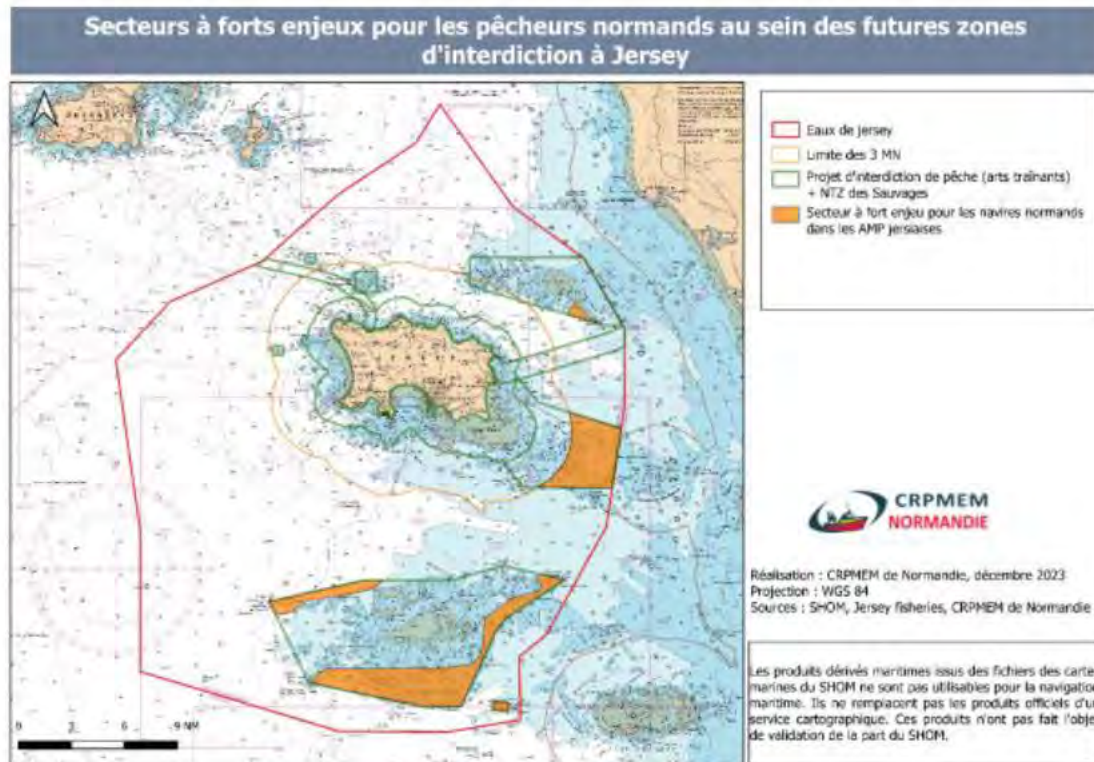
- o There is significant fishing activity in this area, barely mentioned in the document and based on erroneous data concerning Norman fishing

→For habitats of high interest, environmental factors are the most influential on the dynamics of habitats compared to other uses. You need to propose measures not on the precautionary principle but based on tangible evidence, there is a real need for studies aimed at categorising the state of conservation of different habitats, discern the environmental impact (swell, current, etc.) of the anthropogenic impact and to identify and quantify the real impact of the different gear in different habitats.

On the description of fishing activities

- It is a shame that only landing data are presented because they do not in any way reflect the current state of stocks. This data on stocks common to our two countries contradicts with French scientific organizations’ data.

- There is no mention of the ongoing management of French ships in Jersey waters over decades, nor the shared ecolabels (MSC lobster and whelk), true signs of sustainable fishing practices.
 - In the JMSP, the analysis of fishing activities is extremely weak (only the presence/absence of ships)
 - The explanation of the methodology is unclear and confusing since the fleets French and Jersey fleets have been merged graphically, whilst the description only mentions Jersey boats.
 - The analysis of the fishing activities of Jersey vessels and French vessels is not balanced and based on different methodologies:
 - o Jersey vessels are described over 10 years using VMS, AIS data and multi-year FISHMAP surveys. Conversely, French ships are included from a single data source (VMS), over a single year when we were in post-Brexit negotiations and where regulations fluctuated widely. Activity analysis of the French fishing industry is unrepresentative and incomplete over this period.
 - o Activity in certain sectors has been significantly underestimated and therefore does not reflect the challenges for certain métiers (example: Les Sauvages sector). It is therefore necessary, at the very minimum, that French fishing activities are assessed at their true value in Jersey waters
 - o Questionable use of VMS data: 25% of the data could not be linked to fishing declarations but have nevertheless been processed.
- As recommended by Jersey, we propose that a socio-economic analysis of the activity of French vessels be carried out, however in conjunction with French fisheries representatives so that the analysis is as representative as possible.



In order to meet your conservation objectives while preserving our traditional fisheries, just like the joint approach taken when setting up the Ramsar protection zones, we hope that a dialogue of consultation is established between Jersey and French fisheries representatives prior to the adoption of the proposed areas and finalization of the JMSP. We would like to be able to review the proposed areas, as we believe it is possible to arrive at the same amount of protected areas, and with equally interesting habitats from a biological point of view, but with less marked impact on Normandy fishing.

TESTIMONIALS: Individual contributions from Norman fishermen

Norman fishermen have also made their individual contributions to this consultation. Some of these contributions were relayed to us and are presented below.

Beyond diplomatic ballets, conventions and laws, more or less complete scientific arguments, administrative analyses, play out the lives of men and women fully integrated into the social, cultural and economic life of the coast.

We wanted to share these testimonies.

These are the fishermen:

Government	Percentage
Current government	55%
Previous government	45%

Contribution from [REDACTED] ship [REDACTED]

Dear,

I would like to give you my feedback on the current public consultation. [REDACTED]

[REDACTED] [REDACTED] years old, boss and owner of the [REDACTED] since March [REDACTED] I have been registered as a seafarer since [REDACTED] and have been fishing since I am 20.

I am the third generation of fishermen in my family. My father and my grandfather before me worked in the waters of Jersey, Guernsey and Sark. I fish for whelks and large crustaceans (spiders, lobsters) in the Dirouilles and Ecréhou, all year round, except in January due to the closure of whelk fishing. Cohabitation with Jersey fishermen has always gone well for me. Relations were already good under the Granville Bay Treaty. Since Brexit, and despite the difficulties of implementation, as much for Jersey fishermen as for French fishermen, these relations are still good amongst fishermen today.

However, I think that the plans envisaged by Jersey to develop a network of marine protected areas, banning mobile gear, and also by setting up a wind farm, will significantly reduce fishing areas for trawlers, which will have to exploit the areas already occupied by potters. Cohabitation will be difficult because the two types of fishing are not ideally compatible. This will impact French fishermen among themselves, but also the Jersey fishermen and the Norman fishermen. The space that separates our coasts from Jersey is not that big and will hardly cope accommodating so many ships. There will definitely be an impact on small-scale traditional fishing, which I practice, which is already in difficult times because of quotas. Currently, the space is already very busy, it is important to see that we work everywhere in order to perform rotations and avoid exhausting a sector, removing such large areas will therefore have an impact on the resources and lead to overfishing. In addition, this will cause cohabitation problems for the sectors which will remain open.

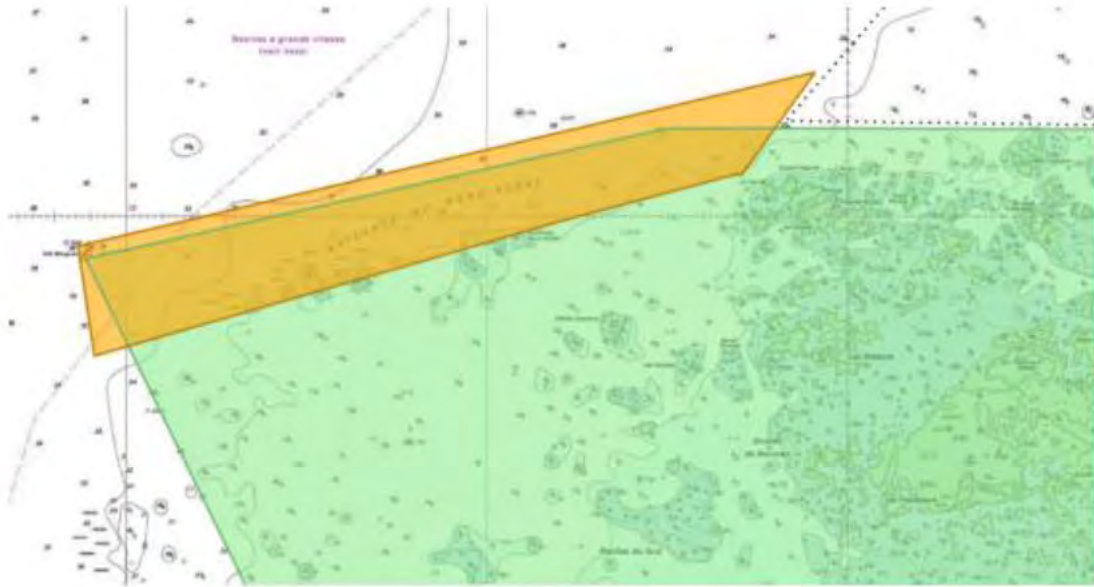
It would be a shame if small-scale traditional fishing disappeared from Normandy and Jersey waters, because in my opinion, it is the most respectful way of fishing the marine environment, with thoughtful and sustainable management of resources and seasonality.

Once again, you present to us here measures which will reduce the fishing possibilities of professionals, French or Jersey. This therefore adds an additional

constraint to fishing. We feel completely excluded, whether you consider the loss of fishing areas or the way you have tried to implement this project. We have always worked in Jersey waters and it is difficult to imagine being excluded given our history but also given the distance that separates us: only a few miles between Carteret and Les Ecréhous...

Best regards

Contribution from Mr [REDACTED] ship [REDACTED] Good morning, My name is [REDACTED] I am the skipper of the shellfish trawler [REDACTED] We We have been fishing in Jersey waters for 37 years using trawls and scallop dredges. We trawl almost all year round in Jersey waters. We target sea bream in the spring and since Brexit we have lost $\frac{3}{4}$ of the fishing areas in Jersey for this species. The project as it is presented removes all fishing zones from me. I would like to remind you that the Sea bream fishing is done with a pelagic trawl, which has no impact on the bottom. We also trawl in the East and West Jersey, if marine protected areas are implemented, we will lose all our zones in the east. My family has been fishing in Jersey waters for at least 4 generations. We have seen fishing areas removed over the last 30 years. We are a traditional coastal boat, we cannot go offshore fishing. We lose fishing rights on a regular basis in your waters, initially under the pretext of protection of habitats with Ramsar sites, then it is a question of protection of sea bream with zones of nesting and now, the protection of 25% of your waters, and this whilst mentioning a future ban on mobile gear. I'm not even talking about the loss of rights caused by Brexit even though it was done within a Treaty supposed to guarantee us the ability to work "as before". The way these measures are presented, and the areas identified as future 'marine protected areas' it make me doubt the real merits of the approach: is it only a desire to protect habitats or is this an additional way to put pressure on the French mobile gear boats? Concerning the sites themselves, there are two areas which represent a strong economic challenge for me, they are shown in the maps below:



Regarding the Arconies sector, many of us use it as a shelter area: it allows us to work in west-southwest winds, which makes it very important for us.

It is really important that we can discuss these sectors with you. I know we are now two different countries, that there is no longer a Treaty that unites us, but it must be possible to be able to maintain relations.

When the Ramsar sites were established, we were consulted and this made it possible to define areas that made it possible to protect critical habitats while limiting the impacts on our activity. This type of process makes it possible to evolve more peacefully and therefore to limit tensions that such a project can generate.

We have barely come out of Brexit, we have heard everywhere that local fishermen would not be impacted by the Brexit, but that is not true and here you are talking about withdrawing us from fishing zones again. Throughout this troubled period, we have done everything to maintain a climate of good understanding with our colleagues in Jersey and we would like this to continue.

Wishing you good reception

Contribution from Mr. [REDACTED] ship [REDACTED]

Dear,

I am Mr [REDACTED] [REDACTED]-year-old fisherman, owner of the fishing vessel ' [REDACTED] » purchased in September 2014.

Coming from a family of fishermen, it was my father then skipper of the trawler ' [REDACTED] » who gave me the desire and passion to work as a traditional fisherman. Since 2000 I have been on board on the [REDACTED] In [REDACTED] I became the boss and have been the owner since [REDACTED] So that's 23 years that I have been on the same traditional fishing vessel in the same waters.

As you can see, I am the vessel with the most days in Jersey waters. This is because **I fish ONLY in Jersey waters and all year round.** This is why I am committed to maintaining good relations with you. I provide you, on time, my fishing declarations. Every time I am checked by your control services, and this for years, I am always courteous, polite and open to dialogue to maintain our good relations, even during the complications of Brexit. Thus, I scrupulously respect Jersey regulations. I have never been fined for overquotas or undersizes, for example.

If I work entirely in Jersey waters, it's because I have no choice, no other places where I could fish for sea almonds (GKT). This very localized species represents 3/4 of my annual fishing.

I am one of the only vessels in Granville and even in West Cotentin to do this specialised type of fishing. Unlike other vessels which mainly fish around Chausey, with the possibility of shelter around the archipelago in case of bad weather, my type of fishing racks up additional diesel costs to reach Jersey waters. In addition, I have no shelter areas, I am always in the full force of the wind.

My type of fishing means I work in specific sectors. I have no choice but to work to the South and West of the Minquiers, around the existing RAMSAR zone. I also work in the sectors of CAUX, ANQUETE, GRUNE LA HAUCHE, Les ARCONIES, ECREVIERE and in the telephone cable sector.

All of these areas mentioned are essential to the proper functioning of my business.

I am also surprised that the fallout linked to BREXIT is not over and that our neighbors in Jersey already want to impose new fishing bans on us via marine protected areas (MPAs) by systematically excluding mobile gear. In France, MPAs do not systematically exclude mobile gear which thus remain authorized. So I'm at a loss. I would like to state for the record that I work on sandy bottoms, contrary to what the map of the habitats in certain areas state, and that I can certify to you that I have never brought up eelgrass, Kelp or Maërl in the sectors where I fish. Proof that mobile gear fishing is compatible in certain sectors. Protecting does not mean prohibiting.

Therefore, I ask you to study my personal case, to begin a dialogue in order to find "common ground". I would like us to be able to consult and discuss areas to be favored over others. I hope that we find solutions jointly that are suitable and accepted to everyone, as has been the case in the past for the RAMSAR areas which has proven itself.

Finally, I would like to inform you that the **survival of my traditional fishing business and that of my family depends EXCLUSIVELY on my fishing in Jersey waters.** My

company supports 3 sailors and their families. It also supports my own family since my father and my wife are employed on land for my company.

If unfortunately all the proposed MPAs were banned for life, I would be obliged to stop my job which I do with passion, to sell my boat which is my whole life, to lay off my 3 sailors, as well as my father and my wife. It would be terrible.

Hoping that my participation and my example will be studied and considered by Jersey. I remain convinced that the friendship between our two countries will make it possible to find a common solution. I hang on to this hope in order to be able to continue to make a living from my profession which was passed down to me from father to son with passion.

Indeed, since Brexit and all the consequences, morale is at its lowest and the fear of losing everything overnight has an even greater impact on morale on a daily basis.

While waiting for news which I hope will be positive in order to find common ground between the different parties, I send you my sincere greetings.

Mr [REDACTED]

Contribution from Mr [REDACTED] ship [REDACTED]

Dear Jersey,

I have been a Granville fisherman for 24 years. I have always navigated the waters of Jersey, as many generations of French fishermen before me did. This proximity, our common history and our shared values make me consider our two countries like two brothers who have forged a friendship for centuries.

Since the 2000s I have been fishing in Jersey for shellfish with a dredge and fish with a trawl. After 20 years of common sea (la mer commune) and stability that suited everyone, Brexit was a hard blow .

In addition to the lost fishing rights, it took me more than 2 years for my activity in your waters to be recognized and to finally obtain my fishing permits. These 2 years have been very hard for me, physically, financially and morally.

For many years I have been fishing in Jersey in the same areas that I know by heart the reliefs and habitats present at the bottom. My sectors are: south-east and east of Minquiers, East Jersey and the Arconies.

Contrary to what the maps indicate, there are no species of interest to protect in my fishing areas, there is only sand and live shells. I also observe that the practice of dredging on the bottom allows the sediments to be aerated, like a gardener who maintains his garden. This prevents the shellfish from dying, quite the contrary, this promotes the food supply and the regeneration of species. So I don't understand why there are these protection zones which systematically exclude mobile gear. As proposed, these zones would cause the end of many French fishermen and jersiais.

I therefore hope that the environmental objectives will be adapted to the challenges and economics of traditional fishing.

Jersey, my brothers across the way, receive my distinguished greetings, Raphaël Chayla

Contribution from M [REDACTED] ships [REDACTED] and [REDACTED]

Sir,

I am the owner of the [REDACTED] and I skipper the [REDACTED] two whelk boats from [REDACTED]. In both cases, my boats mainly fish for whelks but also for crustaceans, particularly spider crab.

I work all year round between the "Boeuf" sector and the Arconie plateau. We work across two borders both in Jersey and Normandy waters. Many of us work in this sector, whether the potters or the dredgers, it is a rich and very interesting area for fishing. The fact we are so numerous and with a mix of different professions creates cohabitation challenges. Following Brexit, between those of us who had access to Jersey waters and the others, a balance had to be found to allow everyone to work. Now you want to set up protected marine areas, including a large one in the eastern Arconie. This will cause more big changes for the dredgers because, if I understand correctly, they will no longer be able to come.

Concretely, this means that they will have to go and work elsewhere. This will therefore impact the whole fisheries in the area. And this will therefore have big consequences on other professions: problems of cohabitation, fewer possibilities of rotation between professions. So this will have an impact on all fishing businesses on

the coast but also on the resource: we will no longer be able to change zones as easily, which risks exhausting certain sectors.

I am involved in fisheries management. When necessary, I find it normal to take action but here, I must admit that I do not understand the point of taking management measures on areas in good condition at the risk of having a negative impact on the resource.

According to the document, currently only the mobile gear is concerned apart from at Les Sauvages. What will happen to potting in the years to come? is the ban on Les Sauvages just a start? The process that is launched with this document is very worrying for us, we have the feeling that it comes as a continuation of Brexit in order to push the French out.

I have always worked in this sector, until now our relations seemed good to me, now, I feel like we have become the bane (that everything is aimed at us). Yet our practices have not changed, On the contrary, measures are taken regularly to reduce fishing effort. It is therefore difficult to imagine the establishment of such MPA sites and that these sites only serve to constrain fishermen.

Hoping for a return to more peaceful and fluid relationships, please accept, sir, my distinguished greetings

Contribution from Mr [REDACTED], ship [REDACTED]

Good morning,

My name is [REDACTED] and I have been a professional fishermen, in the waters of Jersey, since June [REDACTED], first as a sailor, then from [REDACTED] to [REDACTED] alone aboard my boat the "[REDACTED]". Since January [REDACTED] my son [REDACTED] has been sailing with me with the aim of taking over my work. We mainly fish for lobster and spider crab with pots, on the Minquiers plateau. I was one of the actors in the Granville Bay treaty, I participated in all the preparatory meetings from [REDACTED] to [REDACTED] then after its signature I sat on its management committee until its repeal in 2020. Collaboration

with representatives from Jersey was initially hesitant, then constructive, then tense again against the backdrop of Brexit.

In 2000 the treaty established a sharp reduction in our fishing rights in the waters of Jersey, a reduction widely agreed to and in return for which a system of co-management of maritime space was established. In this context, we have, by mutual agreement, defined the exclusion zones for mobile gear in the Minquiers and Ecréhous, which, while meeting Jersey's RAMSAR obligations, preserved our fishing rights as much as possible. This win-win system does not seem to underlie your current project where the majority of the areas that you propose banning mobile gear appears to be modeled to the main fishing grounds, while, in other areas, your protection charts and our activity charts do not overlap.

Furthermore, it seems that your protection zone must now absolutely exclude mobile gear yet this activity has, until now, not prevented the seabed that you claim to protect from prospering and that mobile gear, the TCA obliges, is not going to increase. For the sake of consistency, you would like to connect your network to the French AMP network. You will no doubt have missed that the activities of mobile gear are not prohibited there because they are considered to have little impact on habitats.

If your project were to succeed as is, it would constitute a significant reduction in fishing rights of our smallest mobile gear boats, excluding them from the areas closest to our coasts, which is contrary to the spirit of the TCA. This would be a very bad message to send in a context where the embers of Brexit have not been extinguished and where negotiations on the future are not completely finalized.

As far as I am concerned more directly, your activity records of the French potholders, for the crustaceans as for the whelk, show little or no presence in the eastern and southeast of Minquiers while we work there all year round, both outside and in the NTZ of Les Sauvages where despite regular activity for decades, the species that you say you want to protect seem to prosper. Species which for the gorgon, cold water coral, would be more sensitive to global warming than to fishing and whose protection by banning a low-impact fishing in shallow waters is futile in the face of increasing fishing temperatures. As for brachiopods, they seem, due to their size, insensitive to our activity.

Creating an NTZ in such a busy location, the size of about 160 football fields, to such unfounded reasons seems more to respond to the spirit of the times rather than to a real concern for conservation.

Thanking you for associating us with this consultation, best regards, [REDACTED]

Contribution from Mr [REDACTED] ship [REDACTED]

Good morning,

I am the shipowner of [REDACTED] a fisherman from Gouville sur Mer. I mainly fish for whelks in the Le Boeuf sector and I also fish for shellfish: lobster and spiders. My activity in the waters of Jersey is quite border-line, I work near the Arconie plateau.

In your document, I understand that the desire is to protect habitats and that the potters would be less affected. However, in the Sauvage sector, you are talking about banning them because the sectors damage the seabed. Is this a long-term project on the other MPAs?

Prohibiting mobile gear in large sectors as you propose in your document will have big consequences. Many of us work between Jersey and France, we seek to cohabit in good conditions, respecting each other and ensuring that the material environment is respected. This became much more complex in 2021 when several colleagues lost their access to Jersey waters. I work a lot on cohabitation between ships, particularly between mobile gear and static gear vessels. Removing more areas for the mobile gear fleet will unbalance everything and this will have consequences on all ships. That will therefore also have a strong impact on our fishing strategies and our possibilities of rotation between the different areas.

The proximity between Jersey and the Normandy coast is obvious, we are close neighbors. We therefore have the same issues, whether ecological or economic. As fishermen, we have always sought to ensure sustainable, environmentally friendly fishing. We are accustomed to taking action but only when justified. In the case of areas presented here, I ask myself the question: do we know if the habitats you wish to protect are in a good condition? is there an interest in protecting ecosystems that are doing well to the detriment of activities economics that have been in place for years?

I feel like this is yet another way to keep us out of Jersey waters. It is difficult to understand when we see that exchanges between fishermen or with fish merchants are rather good. We have a long-standing common history. We have always worked together and shared the sea. We must not forget that we are close neighbours, so it is important to take this into account in your document and ensure exchanges happen between our two regions in order to guarantee our common interests. Best regards

Contribution from Mr. [REDACTED] ship [REDACTED]

Dear,

I the undersigned Mr [REDACTED] fisherman skipper in Granville working in the waters of Jersey since the acquisition of my father's ship who himself worked in its waters with his first boat (the [REDACTED]) in [REDACTED] then with the [REDACTED] from [REDACTED] to [REDACTED] the year of his retirement. My grandfather also worked in the waters of the Minquiers with pots with his boat called [REDACTED] in the 1970s. I come from the 6th generation of fishermen. Before Brexit we fished regularly in the south-east, east, north-east part of Minquiers, as well as in the south-east part of Jersey particularly for clam and scallop fishing. I am not opposed to Marine Protected Areas (MPAs). However, small mobile gear ships like ours can fish in French MPAs. Why will we be automatically banned from fishing in Jersey MPAs? Our turnover in these areas is quite significant for our family business. If we lose access to these areas as proposed by the network of marine protected areas, this will put our business in danger.

Our previous regional regulations prior to Brexit allowed particularly rigorous management in your waters (daily quota, 92mm rings, fishing day with schedule, weekend closure, seeding of this area, four-month organic closure and a half from May 15 to October 1).

This allowed us to strengthen the resource which is doing well, particularly in your waters. I would like you to take all these elements into account when thinking of my case and thank you in advance.

Please accept my sincere greetings, Madam, Sir.

Mr [REDACTED]

Contribution from Mr [REDACTED], ships [REDACTED] and [REDACTED]

Good morning,

I am [REDACTED], owner of the [REDACTED], 10m potfisher doing whelk and shellfish fishing throughout the year, and the ship [REDACTED]: a 12m multi-purpose fishing vessel fishing scallops from October to May, and pots from the end of May to September. We are currently a small business 6 Sailors, 3 on each boat, and 3 people on shore for sales and equipment maintenance.

Our company was founded by my father [REDACTED] in [REDACTED], already working on pots on his wooden dory along the coast. From [REDACTED] and the purchase of the [REDACTED] we started to come in the Jersey zones currently A B and C. In [REDACTED] we bought the [REDACTED] we were doing dredging in winter and potting in the spring and summer, we work in zones A B and C following the treaty of Granville Bay. In [REDACTED] we developed the company with the purchase of a second boat. [REDACTED] and now with the [REDACTED] which arrived in [REDACTED] At that time we worked 80% of our time in Jersey waters. In [REDACTED] we lost the [REDACTED] following a fire, and in June [REDACTED] we had our new boat [REDACTED].

Originally I was one of the rare fishermen who could work in zone A. We have now lost this zone, there is also the Ecréhous protection zone which is now prohibited to mobile gear. 3 years ago, Brexit caused us to lose a lot of access and especially fishing rights. Now these are the habitat protection zones, how far will this go?

I am currently of retirement age, my son and I would like to keep this business going in the future. This is why he must be able to take over the business behind me, as I did with my father, given the circumstances, this could be very complicated, so much so that I wonder if we should stop everything, what is the future of fishing in Carteret if the gates of Jersey continue to close? The border is 5 nautical miles from our port, we are totally blocked by Jersey waters.

We are a small fishing unit, we practice traditional fishing with day fishing trips. We have been working there forever and the resource is doing well, this shows that our impact on the environment is limited, it must therefore be possible to find some

solutions. All the more that there would be no problem for part of the sectors to be protected. However, some areas are sectors of concern for us, so it would be good to redefine the zoning.

In your document, you talk about taking into account all the issues, including those related to fishing, I hope in this case that you will identify the impact that the establishment of such sites will have on our activity and that you will take it into account when implementing your measures.

Hoping that you will take these elements into consideration, please accept my sincere greetings

Contribution du CRPMEM de Normandie à la consultation publique sur le Jersey Marine Spatial Plan sur son projet Éolien en Mer



IMSP

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1 Pourquoi le comité participe à la consultation publique de Jersey sur son projet éolien ?

En tant que structure professionnelle ayant pour but de défendre les intérêts des pêcheurs normands, le CRPMEM de Normandie souhaite apporter sa contribution à cette consultation dans le but de rappeler l'importance des eaux jersiaises pour la pêche normande et faire profiter de son retour d'expérience sur les parcs éoliens normands.

Rappel des relations historiques Normandie-Jersey

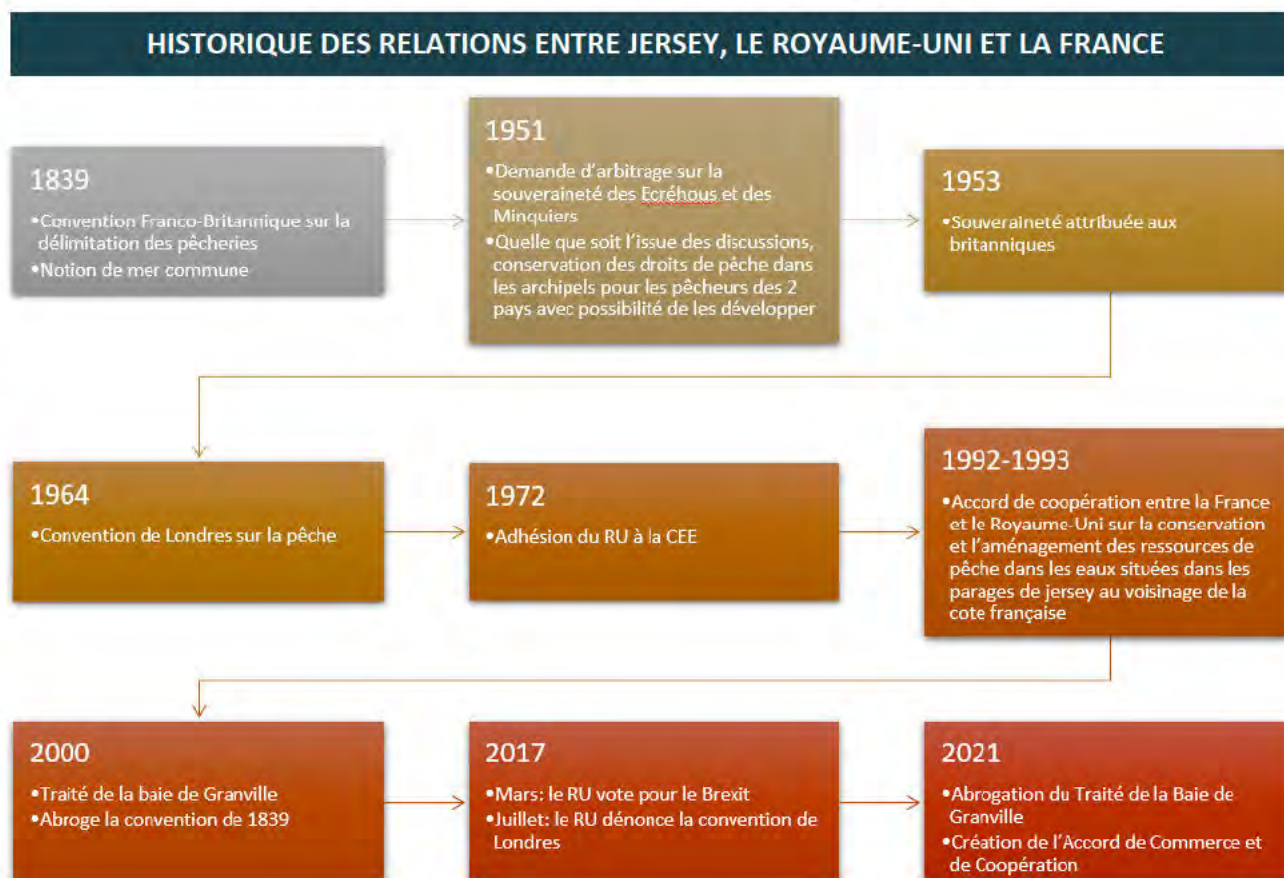
Jersey et la Normandie sont fortement liés par l'Histoire (Figure 1), nous avons été séparés en 1204 lorsque la France a repris possession de la Normandie en oubliant les îles Anglo-normandes. Cependant, nos destinées ont toujours été liées. Les origines normandes sont d'ailleurs très marquées à Jersey.

En témoigne notre proximité géographique, Jersey n'est qu'à 12.03 milles nautiques des côtes françaises, soit 22.2 km. Cette proximité a d'ailleurs engendré des échanges entre pêcheurs depuis presque deux siècles.

À ce titre, plusieurs accords ont déjà été signés, source de nombreux échanges. Le dernier en date était le Traité de la Baie de Granville qui avait notamment pour objectif de mettre en place des modalités de gestion commune concernant la pêche dans ce périmètre.

Il est aussi à prendre en compte que Jersey est également engagé via le Trade and Cooperation Agreement (TCA) en ce qui concerne la pêche française. Dans ce cadre, aucunes mesures discriminatoires ne peuvent être mise en place et Jersey s'est engagé à assurer un maintien des activités telles qu'elles existaient avant le Brexit.

Figure 1 : Historique des relations entre Jersey, le Royaume uni et la France



Importance des eaux de jersiaise pour la pêche locale française

Ainsi, la pêche française, en tant qu'activité traditionnelle et historique dans les eaux de Jersey, est à considérer dans le cadre d'un projet éolien en mer. En effet, elle représente plus de 50% de l'activité de pêche dans les eaux de Jersey. Les navires de pêche normands travaillent dans ce secteur depuis des siècles. Aujourd'hui, les principales activités sont divisées en deux types de métiers :

- Les arts dormants : casiers à crustacés, casiers à bulot, filets et métiers de l'hameçon
- Les arts traînants : dragues à coquille Saint-Jacques, drague à praire et amande de mer, drague à bivalves, chalut de fond, chalut à perche, chalut pélagique, chalut en bœuf

Selon les métiers pratiqués, les stratégies de pêche de chaque navire diffèrent plus ou moins en fonction de la réglementation, de la saisonnalité, de l'espèce pêchée et de sa disponibilité, de la distance au port. Cette variété de métiers et de pratiques permet de créer un équilibre compatible avec la durabilité des stocks, ce qui implique également une préservation des habitats dont les fonctionnalités pour les espèces halieutiques ne sont plus à démontrer.

Pour des raisons économiques, les pêcheurs cherchent à limiter leur temps de route, le fait de travailler dans les eaux de Jersey n'est pas une fin en soi mais la réponse à une stratégie de pêche afin de trouver l'équilibre entre production et coûts (Figure 2). Ces secteurs sont donc essentiels au maintien économique des entreprises. Ainsi un parc éolien créant un effet barrage et impliquant un détour de route important pourrait remettre en cause la viabilité économique de ces activités historiques. Les arts traînants pratiquant le chalut et la drague à CSJ sont les premiers impactés.

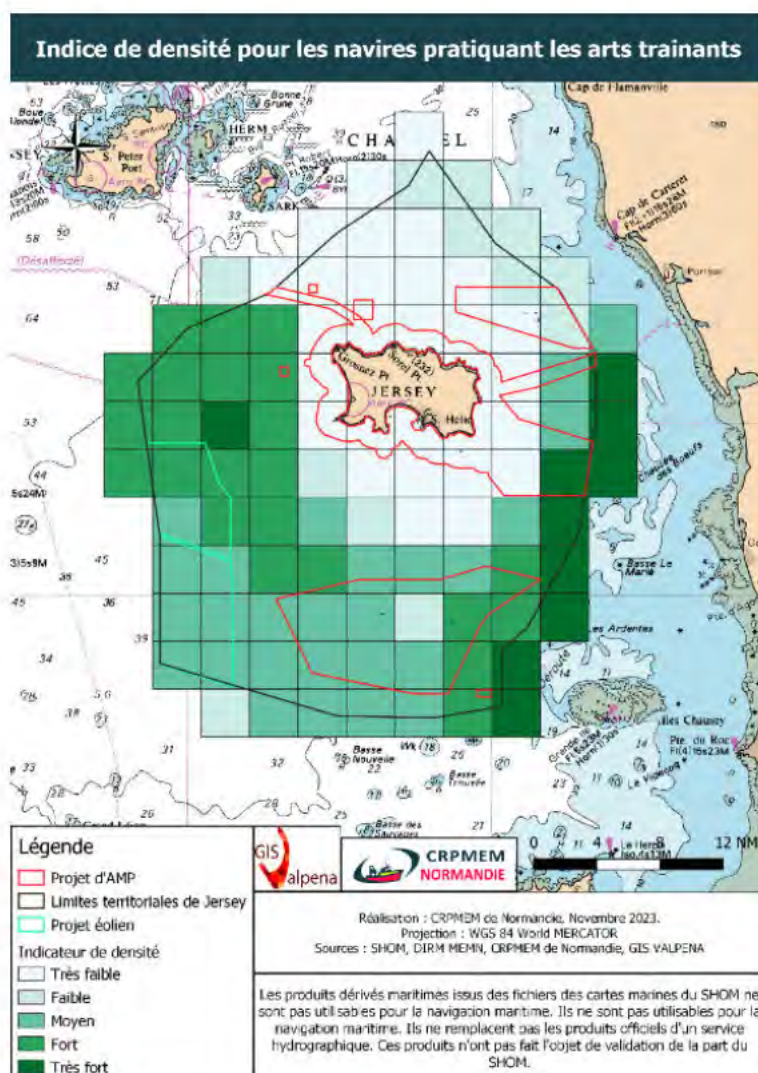


Figure 2 : Cartographie montrant l'indice de densité par maille VALPENa pour les navires pratiquant les arts traînants

2 L'énergie éolienne, une énergie pas si propre

L'énergie actuelle de Jersey plus propre que l'éolien

Fondée en 1924, la Jersey Electricity Company (JEC) permettait aux habitants de Jersey d'être alimenté en énergie par une petite centrale électrique à l'extrémité d'Albert Pier. 10 ans plus tard, cette centrale est remplacée par une plus grande à Queen's Road. Dans les années 1960, l'augmentation de la demande en électricité impose le passage à une centrale au fioul encore plus puissante. Une nouvelle centrale est donc construite : la centrale de La Colette Power Station qui a desservi l'île pendant plus de 50 ans.

3 câbles sous-marins desservent cette centrale électrique en énergie nucléaire française. Cette énergie à faible émission carbone permet à Jersey de remplir ses besoins en électricité. Jersey bénéficie d'un approvisionnement en électricité presque totalement sécurisé et décarboné. Jersey est donc alimenté à 95% par le nucléaire français et à 5% par la centrale au fioul de la Colette Jersey.

Des études d'impacts environnementales ont été réalisées sur les différents moyens de production en énergie par l'ADEME (ADEME, 2015). Ces études considèrent l'évaluation à l'aide d'une analyse du cycle de vie (elle tient compte du transport, de la fabrication, de l'installation, de l'utilisation et de la fin de vie des machines). Ainsi, l'ADEME évalue en 2015 le taux d'émission des parcs éoliens français à 14.8g d'équivalent CO2 par kWh pour une durée de vie du parc de 20 ans. Le nucléaire est quand-à-lui à moins de 6g équivalent CO2/kWh.

3 Le sacrifice de l'environnement au bénéfice d'enjeux socio-économiques

Opposition de la protection de la biodiversité et de la lutte contre le changement climatique

La production d'énergie éolienne offshore dans la lutte contre le changement climatique s'oppose à la protection de la biodiversité, à l'objectif de zéro perte nette de biodiversité, la protection des espèces protégées sous les deux directives Natura 2000 (Oiseaux et habitats) et la Directive Cadre Stratégique pour le Milieu Marin (DCSMM) établissant un cadre de protection pour le milieu marin.

En effet, la production d'énergie éolienne implique :

- La destruction d'habitats et des fonctionnalités écologiques

La zone projet d'implantation du projet de parc se situe sur un type d'habitat spécifique à la présence de gorgone, fonds durs stables. L'implantation conduira à une destruction significative de cet habitat avec une remise en cause de la résilience des gorgones. Ainsi, où est la cohérence de protection de ce type d'habitat sur un site comme les Sauvages alors qu'on les condamne au sud-ouest des eaux de Jersey ?

- Des perturbations sonores sous-marines durables

Elles sont causées par les différentes phases d'implantation d'un parc éolien en mer. Tels que les champs électromagnétiques créent autour des câbles de raccordement de liaison inter-éoliennes, le bruit sonore des phases de battage et de forage des pieux.

Quand les données sont disponibles, les recherches montrent que les mammifères marins et poissons sont particulièrement sensibles et que le bruit sous-marin peut impliquer :

- des traumatismes transitoires ou permanents de l'appareil auditif
- des troubles liés au stress
- des réponses comportementales : réactions d'évitement exemple du phoque s'éloignant à 25km de distance (CNRS,2021), de fuite, changements concernant l'alimentation, la réaction aux prédateurs, etc.
- un masquage de signaux d'intérêt qui ne sont plus efficacement détectés ou reconnus

Chez les crustacés par exemple, il a été constaté une altération de la croissance, de la reproduction et des modifications des capacités immunologiques. Dans certains cas extrêmes, l'impact des bruits d'origine anthropique peut être mortel chez ces mêmes mammifères et poissons.

- Une quantité d'impacts méconnus

Le véritable impact des modifications du niveau sonore

Les études d'impact préliminaires aux demandes d'autorisations souffrent du manque de connaissances sur les espèces, les habitats et leur sensibilité en milieu marin et ce particulièrement au son (CNRS,2021).

La connaissance scientifique sur l'impact des émissions sonores est faible à inexistante pour les effets plus modérés à l'échelle individuelle (dérangement chronique) qui peuvent néanmoins avoir des conséquences importantes au niveau populationnel (CNRS,2021). L'étude de (Kastelein et al., 2017) montre que le stress induit par le bruit sous-marin peut engendrer des conséquences néfastes à l'échelle d'une population et que le bar est un exemple d'espèce sensible.

La pollution des eaux

En mer, les structures métalliques immergées sont soumises à la corrosion. Des anodes galvaniques composées majoritairement d'aluminium sont souvent utilisées. Elles protègent les fondations de l'éolienne. Leur présence est suspectée d'être une source importante de pollution métallique. Des travaux sont en cours pour faire la lumière sur ce résultat (CNRS,2021). Aussi, la remise en suspension de sédiments lors de la phase travaux peut également permettre de remettre en suspension des polluants, jusqu'alors enfouis dans le sédiment

La modification des champs électromagnétiques

Les câbles et les sous-stations électriques génèrent, eux, des champs électromagnétiques.

Des études sont en cours en France mais les résultats ne sont pas définitifs et non représentatifs du fait du manque de recul scientifique sur les impacts écologiques jugés trop faibles pour écarter le risque. Il existe un déficit de caractérisation physique in situ des champs générés et l'absence d'études sur la réponse des espèces sensibles sur le court et long terme. Le potentiel changement de comportement d'évitement ou d'attraction de la faune et de la flore est à déterminer ainsi qu'un cumul à l'échelle de la façade (Conseil National de la protection de la Nature, 2021; Taromina et al., 2020).

La modification des courants et des dynamiques hydro sédimentaires

Aucun retour scientifique n'est formulé sur l'impact à l'échelle locale et globale de l'implantation de parcs éoliens offshore sur les courants et la dynamique hydro sédimentaire. Pourtant, il existe un risque d'augmentation locale de la turbidité comme en témoigne les patchs autour des pylônes du parc éolien offshore anglais de Thanet et à l'échelle globale une contribution supplémentaire à l'érosion marine des côtes avec de potentielles répercussions

écosystémiques à plusieurs centaines de kilomètres carrés. Il est observé qu'une augmentation de la turbidité s'accompagne généralement d'une diminution de la diversité biologique, de changements de la composition et des fonctions écologiques. L'obstruction des branchies de poissons et la perturbation des stades larvaires, sensibles aux conditions environnementales, peuvent impacter durablement les populations locales (Conseil National de la protection de la Nature, 2021).

Le cumul des impacts, une bombe à retardement

Il est nécessaire que soit considéré le cumul de ces impacts potentiels à l'échelle locale et global de la Manche au regard du cumul du projet de parc éolien de Jersey avec les 5 projets en Normandie en cours de développement ainsi que les volontés françaises en Manche Ouest. La prise en compte de ces impacts cumulés sur le milieu, la biodiversité et les activités préexistante à l'échelle de la façade est inexistante malgré les demandes formulées aux autorités compétentes. En l'état des incertitudes et de la non maîtrise du risque par les porteurs, il devient évident de freiner le développement du secteur.

L'absence d'efficacité des mesures de la séquence Eviter, Réduire et Compenser

La séquence ERC est en mer très compliqué à mettre en œuvre en raison de la multiplicité des paramètres environnementaux que composent le milieu marin.

Les retours d'expériences en France sur des projets éoliens ou sur des projets d'aménagement portuaire montrent :

- **Des mesures d'Evitement réduites**

Ces mesures concernent majoritairement des mesures d'évitement géographique local. Elles devraient pourtant, suite à une analyse du coût bénéfice, pouvoir amener à la remise en cause d'un projet au regard des impacts environnementaux.

Par exemple, Dans le cadre du projet d'aménagement portuaire du Havre de la chatière, aucune réelle mesure d'évitement n'a été proposée par le porteur de projet pourtant celle qui s'imposait aux yeux de tous (administration, autorité environnementale, association de défense de la nature) était le choix d'une solution d'aménagement alternative sans impact sur le milieu marin. Celle-ci n'a pas été considérée par le porteur pour des raisons économiques.

- **Des mesures de réduction concernant majoritairement des réductions d'impacts socio-économiques**

Un certain nombre de mesures de réduction apparaissent dans leur présentation comme relevant de la réduction des impacts environnementaux mais relèvent de fait de la réduction des impacts socio-économiques ou tout simplement d'optimisation économique du projet (IUCN,2021).

Souvent, une partie des mesures proposées pourraient être considérées comme des bonnes pratiques à intégrer dans une norme technique d'application obligatoire : existence d'un plan HQSE, modalités de gestion des projets, plan d'intervention, etc. Les seules mesures spécifiques, qui pour les projets étudiés par l'IUCN portent pour l'essentiel sur les impacts pour l'avifaune dont l'efficacité ou la faisabilité ne sont pour certaines pas encore établies pour des projets en mer (ex. : procédures d'arrêt des éoliennes en cas de comportements particuliers de l'avifaune, domaine où l'expérience paraît à ce jour essentiellement terrestre) (IUCN,2021).

- **Des mesures de compensations inadaptées et sans efficacité**

En théorie, la compensation écologique vise à assurer que s'il reste des impacts résiduels notables même après application des mesures d'évitement et de réduction, des mesures adaptées sont prises pour fournir une contrepartie à ces impacts résiduels, en respectant des principes d'équivalence écologique (IUCN,2021).

En réalité, les mesures de compensation écologique sont difficiles à mettre en œuvre (IUCN,2021), notamment pour les parcs éoliens en mer. Du fait de la spécificité du milieu marin, les mesures compensatoires écologiques sont encore moins bien connues que pour le milieu terrestre. Dans les projets de parc éolien en mer, il y a peu de

véritables mesures de compensation écologique proposées. Certaines ne concernent pas l'environnement ou ne devraient pas être considérées comme des mesures de compensation (IUCN,2021). Elles sont donc rares et peu pertinentes. Leur efficacité est difficile à garantir et ne sont pas pertinentes à l'échelle du projet.

Pour exemple, l'une des mesures compensatoires écologique du parc éolien en mer des Hautes Falaises est de financer l'implantation d'arbres afin de renforcer l'habitat et la migration des chauves-souris, notamment la Pipistrelle de Nathusius (*Pipistrellus nathusii*). Or, d'après les études réalisées par le porteur du projet, ces chauves-souris ont une activité en mer très faible, la zone du parc est à 13 km des côtes et ces dernières volent au raz de l'eau, donc hors de la zone de collision potentielle avec les pales. Les pipistrelles ne sont pas considérées comme impactées par le projet éolien en mer des Hautes-Falaises.

Un effet récif contestable et qui ne fait pas l'unanimité dans le monde scientifique

L'effet récif n'est pas scientifiquement caractérisé. Les parcs éoliens ne peuvent être assimilés à des récifs artificiels dans la mesure où les critères d'implantation reposent sur des critères de localisation, d'architecture et non pas d'optimisation de la productivité de l'écosystème d'accueil. Cette valorisation de la part des industriels est avancée comme argument pour faciliter l'acceptation par le public ou pour justifier le recyclage sur place et éviter un démantèlement coûteux (IFREMER, 2008).

Les fondations des éoliennes entraînent un changement de l'habitat, des compositions biologiques et sédimentaires. D'un point de vue biologique, on assiste à un changement de composition de la faune et de la flore sur et autour des pylônes avec un développement d'invertébrés et d'algues (moules, balanes, algues...) qui se fixent sur les pylônes. Ces invertébrés attirent certains poissons.

Un parc éolien induit donc plutôt un effet « Dispositif de Concentration de Poisson (DCP) » pour des espèces de poissons grégaires et ce, au détriment des espèces historiques sur la zone avant l'installation (Débat public – Dossier du maître d'ouvrage, 2021).

Ainsi, dans les fonds initialement sableux, les espèces de poissons initialement présentes comme les soles, plies, d'autres poissons plats, le lançon mais également le bar, le lieu, le turbot ou la barbotte seront voués à disparaître de cette zone.

Les conséquences du changement de nature des fonds par l'implantation d'un parc éolien sont multiples :

- Les nouvelles espèces profitant du changement de nature de fond ont une faible valeur économique et ne sont donc pas intéressantes pour la pêche
- D'un point de vue écologique, ce sont des espèces qui vivent en banc et qui peuvent prendre tout l'espace, limitant ainsi la biodiversité par l'arrivée d'autres espèces (Fondation pour la Recherche sur la Biodiversité, 2022 ; ICES, 2019).
- Cet effet DCP permet d'attirer des prédateurs notamment des oiseaux ce qui augmente le risque de collision avec les pales des éoliennes et augmente donc la mortalité de ces espèces
- Cet effet reste local et ne se traduit pas à l'échelle globale. (Conseil National de la protection de la Nature, 2021)
- De plus, des espèces invasives peuvent trouver refuge dans ces nouveaux habitats artificiels pour s'y développer (Langhamer, 2012).

La mer du Nord a été précurseur en matière d'éolien en mer. Cette révolution laisse apparaître aujourd'hui une baisse notable de la production primaire pélagique en raison de l'explosion de la biomasse de moules (Slavik et al. 2019). Cette baisse de productivité du milieu pélagique a évidemment des répercussions sur la faune associée, du zooplancton aux poissons. Des effets en cascades sur le réseau trophique sont donc attendus : les effets bénéfiques sur certaines espèces entraîneront des changements d'équilibre écologique au détriment d'autres espèces, et des modifications dans la communauté des prédateurs.

Il existe 3 stades de succession dans les communautés d'encrassement sur les fondations des éoliennes (Energies de la Mer) dont le dernier conduit à un appauvrissement du milieu :

- Un premier stade de développement des différentes espèces fixées
- Un deuxième stade riche en espèce caractérisé par un grand nombre de suspensivores. C'est ce deuxième stade qui est avancé par les industriels présenté comme des hot-spots de biodiversité
- Un troisième stade où la diversité des espèces y est moins grande, l'anémone plumeuse et la moule commune étant les espèces dominantes. C'est à ce stade que semblent être les parcs éoliens en mer du Nord.

4 Une cohabitation au dépend des activités historiques

La Normandie est la région où se cumule le plus de projets de parcs éoliens offshore dans un espace très restreint au contexte plus que tendu en raison de l'explosion des usages en mer et des enjeux de gestion durable des ressources biologiques marines qui touchent l'activité de pêche professionnelle. De ce fait, les professionnels de la pêche sont très sensibles à la multiplication des contraintes liées à la coexistence avec de nouveaux usages, dont l'éolien en mer.

Une perte d'espace pour la pêche professionnelle

- **Phase travaux**

La présence d'un parc éolien en mer engendre de lourdes conséquences pour les activités de pêche. En effet, lors de la phase travaux d'un parc, des zones d'exclusions de pêche sont imposées pendant de longues périodes créant ainsi une nouvelle répartition de la flotte et de ses zones de pêches, réduisant de nouveau l'espace maritime pour les activités de pêches.

L'implantation d'un parc éolien en mer est également susceptible d'avoir des impacts sur les espèces commerciales (fuites et destruction d'habitats), avec peu de connaissance sur les effets à long terme.

- **Phase d'exploitation**

En phase d'exploitation, lorsque le parc éolien est ouvert à la pêche, les conditions d'accès à ce dernier et la réglementation imposée ont également de lourds impacts sur les activités des pêches. En effet, les quelques retours d'expériences françaises permettent de souligner qu'un parc éolien possède une capacité limitée en termes d'accueil de navire, que cela complique d'avantage la cohabitation entre les différents métiers (trainants et dormants) et que la taille des couloirs de navigation limite les manœuvres des chalutiers/dragueurs en action de pêche (Débat public, 2021).

Une concurrence de l'espace maritime peut se manifester entre les usages au sein d'un parc éolien avec l'arrivée d'activités opportunistes, comme le tourisme ou l'aquaculture.

- **Aquaculture**

Le développement de fermes d'algues ou de tout autre aquaculture dans un parc engendrerait soit une interdiction totale de la pêche soit des exclusions complémentaires dans le parc en raison de l'incompatibilité de ces deux activités et réduirait de nouveau l'espace de pêche pour les professionnels locaux (Langhamer *et al.*, 2009 ; Grossman *et al.*, 2011).

- **Tourismes et loisirs nautiques**

Les retours d'expérience européen montrent que l'installation d'éoliennes en mer ne détourne généralement pas les visiteurs potentiels d'un site touristique et peut même constituer un nouveau centre d'intérêt touristique industriel. La présence de ce type d'activité induit un nouvel impact pour les activités de pêche professionnelles en réduisant les zones de pratique (IFREMER, 2021).

L'augmentation des enjeux de sécurité maritime

Ensouillage et risque de croche

Des câbles non ensouillés représentent un réel danger pour les professionnels de la pêche, crocher un câble au cours d'une action de pêche peut déstabiliser le navire mettant ainsi en danger son équipage (Drew et Hopper, 2009). D'autres risques, sont également à prendre en compte en cas de croches, comme la dégradation du matériel de pêche voir même du câble, ce qui engendre des pertes économiques. La plupart des industriels consultent les pêcheurs pour identifier les risques liés à l'activité de pêche dans la zone, afin d'éviter les conflits éventuels (ceux-ci peuvent être mitigés par l'enfouissement du câble) chaque fois que possible (Drew et Hopper, 2009).

Les engins de pêches les plus susceptibles d'endommager les câbles sont les chaluts de fond et la drague. Deux des activités de pêche les plus retrouvées dans le secteur de Jersey. Sans ensouillage des câbles, la zone sera fermée à ces types de pêche et engendrera une nouvelle exclusion aux chalutiers dragueurs de Normandie.

Selon le Comité International de la protection des Câbles, pour une bonne pratique de la pêche sans danger, il faut ensouiller les câbles afin d'éviter des risques qui peuvent être dangereux et coûteux. Les emplacements de la plupart des câbles sous-marins doivent être indiqués sur les cartes de marine, et aussi sur le logiciel de navigation électronique (Drew et Hopper, 2009).

L'implantation d'un parc éolien représente beaucoup de contraintes pour les activités de pêche professionnelles. Afin de limiter ces effets négatifs, il est important d'impliquer les professionnels et leurs représentants dans les processus décisionnels afin de concevoir le projet de façon à favoriser le maintien au sein du projet dans des conditions acceptables de sécurité de navigation, des activités de pêche maritime professionnelle.

5 Conclusion

Un projet de parc éolien est impactant pour l'environnement et les activités historiquement présentes.

En effet, les différentes phases d'un projet apportent leurs lots d'impacts. La phase de construction est marquée par la destruction significative d'habitats au profit de multiples pieux, de câbles, à une explosion des niveaux de bruits sous-marins, des fuites de la ressource, des pollutions locales, l'exclusion des activités historiques dont la pêche, etc.

La phase d'exploitation marquera un temps de reconquête ou pas des habitats et des espèces initialement présentes. Les activités historiques reprendront, si le projet est dimensionné pour et si la ressource revient, mais dans des conditions difficiles et dangereuses de navigation et de pêche.

Les eaux de Jersey revêtent une grande importance pour la pêche artisanale. Elle y est historique. Un parc éolien dans la zone constituerait une perte, spatiale et d'accès à la ressource, et une barrière en termes de navigation impliquant des reports pouvant remettre en cause la rentabilité des navires.

Ainsi, il est important que tout projet d'implantation soit réfléchi au regard du réel besoin. Jersey est d'ores et déjà approvisionnée à 95% avec une énergie décarbonnée, bon marché et stable.

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4.4.4 Develop a Carbon Sequestration Framework

Although I accept that the smaller Seagrass meadows may have expanded, can we confirm this is true of the largest substantial meadow namely St Catherine's harbour. In that area, substantial areas that should have seagrass cannot be productive due to seagrass mooring. The argument has been put forward that that area did not arise due to natural factors that should not reduce our regard for its importance since the potential for carbon sequestration is very high. New evidence supports the importance of avoiding in sediment disturbance.

Suggested Action - Annually measure St Catherine's Harbour Seagrass and scrape areas.

5.4 Tides

The current circulation shown is potentially an oversimplification being 2 dimensional that does not indicate whether there are differences in current speed, water temperature and direction at depths. The tidal range and topography modify dispersal. There are inshore currents that run in the opposite direction. In some places there are gyres and hydrological anomalies. These affect species breeding and distribution with impacts on the commercial crustacean and mollusc industry. Dispersion along the north coast as an example is affected by smaller gyrations e.g. Bouley Bay. The states of tide and speed variation caused by topography all play a part in dispersion, settlement and algae blooms. The creation of a network needs to consider this as a key factor in siting decisions.

Action – Detailed tidal and topography study is needed.

6.3 Reference is made to Zostera and Kelp forests. There are very few extensive Kelp 'Forests', Rigdon Bank is a Kelp 'Park' and due to the slope gradient most algae on a reef is located on top section in a fairly narrow belt.

Suggested Action - A more accurate assessment of the Kelp communities – size and density.

P.70 Deep Sea- the description is misleading as we also have a deep channel running west to east between the north coast and Jersey. As a natural resource that area is important as it is not conducive to mobile gear.

P.91. JMC are not given recognition here for our contribution JMC/ Jersey Seasearch undertook a number of surveys, provided data and published reports notably for the Société Jersiaise that identified key species and communities on submerged reef systems notably Sauvage and Rigdon.

8.2 No Take Zones – Portelet Sub-tidal surveys. *I have raised my concern that sub-tidal benthic surveys are very important. They seem to be being played down with inter-tidal studies, BRUVs, grabs and towed cameras being utilised. These methods do not identify diversity and small-scale species. Diving even though it cannot be part of a government operation should be outsourced and integrated within the NB 1 priority.*

I once again have to ask for a more truthful statement as it is both unfair and inaccurate to attribute the proposal to protect the Sauvage to BMF and to suggest that Rigdon Bank was an anonymous suggestion. Since at least 2015, JMC have promoted Rigdon and published supportive data and reports. The concept of an NTZ has evolved as a mechanism for protection that fits with Jersey legislation but the call for some form of safeguard was initiated and has regularly been reiterated by JMC. The reef surveys were organised by us, following MB & Fisheries requests, principally promoted by Greg Morel. All the subsequent data was published and summary reports were also created. Publishing data that raises the profile of these key sites is an important part of a protection proposal. When asked to help with the BMF dive planning I proposed their 2021 visits as a continuation of our surveys. JMC published species reports for Rigdon in 2020 & 2021.

8.5.1 *Contrary to the implied statement, I would suggest that the Jersey Wildlife Law does not offer the necessary level of protection. Although threatened species are listed, there is no association in this text with necessary habitat protection. Reference to OSPAR and ASCOBANS identifies Jersey as a signatory but does not recognise the absence of applied mechanisms that identify infringements. Human demands take precedence over animal welfare. Our monitoring program identifies regular and repeated disturbance affecting mammal life cycles and family structure. Vulnerable species are listed but frameworks for practical management have not been developed.*

8.5.3 *We are using thermal imaging drones to locate seal pups and breeding sites. Also, the equipment is helping us locate and map shallow water seabed areas. Could the licence be with the permission of the RMA Chairman and never during the breeding season. JMC uses the equipment to help us locate and extract fishing debris as that is the safest way to do so.*

Possible action NB4 *a licence must be obtained for drone flying and will only be granted to organisations with a legitimate scientific need to deploy the equipment.*

P. 90 *relates sightings to population. Numerous submitted public reports identify activity but since much repetition is possible these cannot be used to estimate population size. I would suggest 'High numbers of porpoises on p.90 be changed to 'High numbers of porpoise sightings have been submitted'. Sea haul-out sites used in the summer are full-filling a digestive and resting function. They are not necessarily breeding sites. None of our own surveys confirm the population sizes anywhere near the claims being made. The report '**Pinnipeds, people and photo identification: the implications of grey seal movements for effective management of the species**' Sayer et al. 2019 provides useful suggestions for research and JMC are following this methodology in an attempt to accurately map distribution and behaviour. The OSPAR report on seal colony management suggests that we are not complying with that directive. The study '**Grey seal abundance patterns in the Channel Islands from 2010 to 2023**' By G.Tully in which JMC had been participating, recommends revisions in methodology. More accurate recording also relates to my previous comment on drones. The MSP makes no reference to this ongoing study.*

NB4 *'and all regular seal out sites should be considered.....*

8.6 *I find myself struggling to agree with the 8d map. The area in green indicating Kelp distribution is very misleading. Rather than indicating where Kelp can be found, the map suggests actual area coverage and has the potential to be used to calculate carbon storage. This implication then distorts the importance of other seabed types. From our survey data CAFOR scale, the actual coverage is about 10% of that implied by the map from my estimates. I have to accept some of the responsibility for this as the Seasearch reports don't clearly quantify habitat area within a survey site. I know of very few 'kelp forests' in Jersey water. Possibly more study needs to be done to estimate Kelp density. Also, the generalisation on Seagrass is misleading. Zostera m. and Zostera n. function very differently and overlap different littoral zones; '**Management considerations for subtidal Zostera marina beds in Ireland**' Dale et al., 2008.*

*The section on Seagrass beds is misleading. St Catherine's Harbour is substantially larger and functioning as a significant seagrass meadow. JMC funded and supervised the report on the extent of the area. '**Investigating the carbon sequestration potential of seagrass (Zostera spp.) in St. Catherine's Bay, Jersey**' Kuo, 2022.*

8.6.3. Rock-Kelp Reference *section to Seagrass Forests and the inference that we have numerous extensive dense areas is misleading '**Status and Trends for the World's Kelp Forests**' Wernberg et al. 2019. A Kelp Forest should not to be confused with the presence of species Forest Kelp (Laminara*

hyperborea).

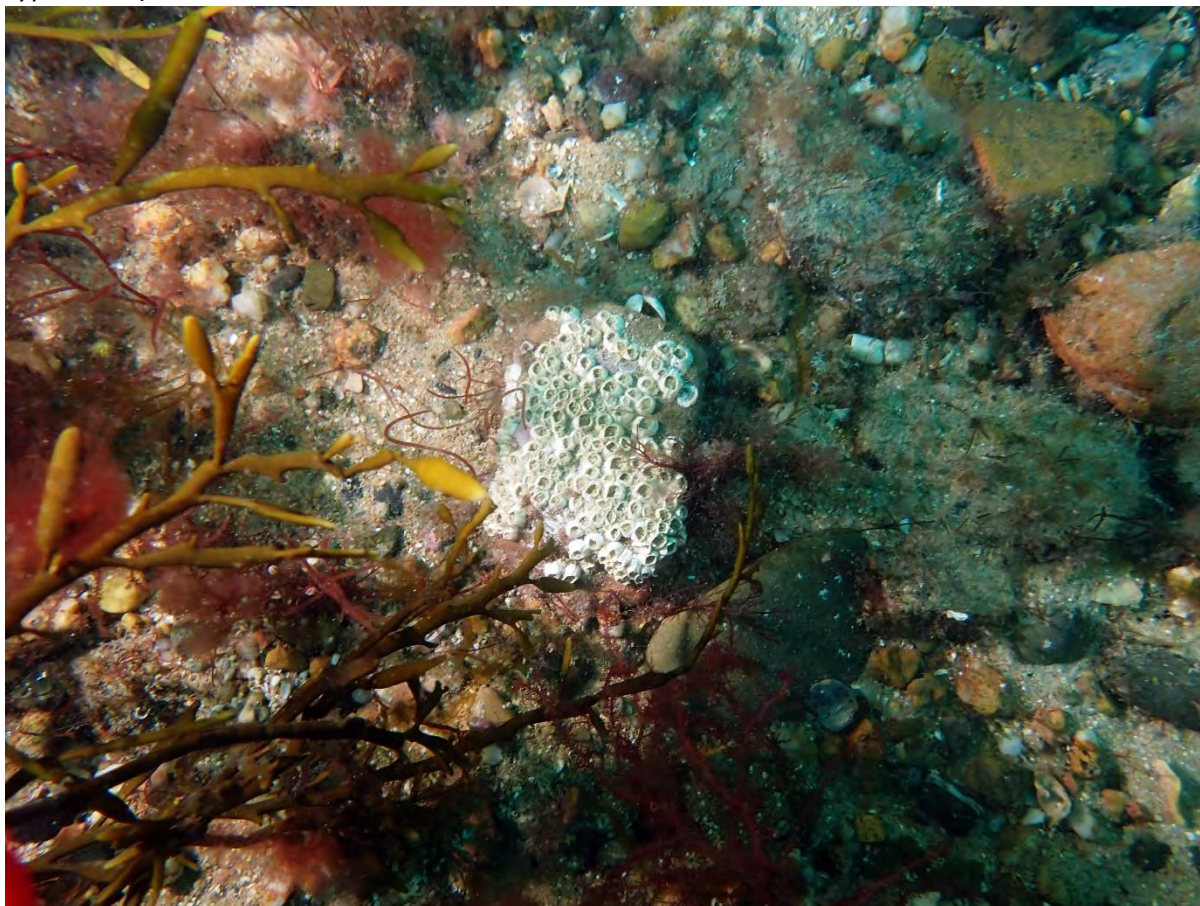


Figure 1 Hardground unstable

8.6.6 *The BC3 areas in fig 8j since they contain high inorganic carbon potentially should be considered as areas requiring some form of protection and there is a link to the Wind Farm proposals isn't there?*

Figs 8k and 8l *Once again the vocabulary is misleading. Yes, Maerl and Seagrass should be protected under OSPAR but the text implies that Seagrass protection is in place. Actually evidence demonstrates that areas of gravel and sand (ie mobile) are depleted of biodiversity through mobile gear disturbance.*

8.6.8 *Suggestion for revised stronger wording 'As a contracting party to the OSPAR convention the government of Jersey is now prioritising the aims of the'*

Fig 8z Stage 6 & 7 *not sure whether we have conclusive evidence of that!*

Priority NB6 *Excellent!! Does JMC deserve a mention here with 3 published reports?*

Fig 9j. *Excellent proposals!!*

Section 9.5 Areas of low crustacean yield are over potted. In some particular areas, Ghost pots and ropes foul active strings. There appears to be no proposed control over potting density which could potentially restore depleted reef based crustacean populations. My impression was that the reduction in Edible Crab and Crawfish was a big concern. Key sites for juveniles are netted and heavily potted. For example, Noirmont, Bouley Harbour, Bonne Nuit Bay and the tidal fringes of the SW Ramsar area.

10.7 & 10.8 *The work by JMC and published information to recognise the significance of our wrecks is*

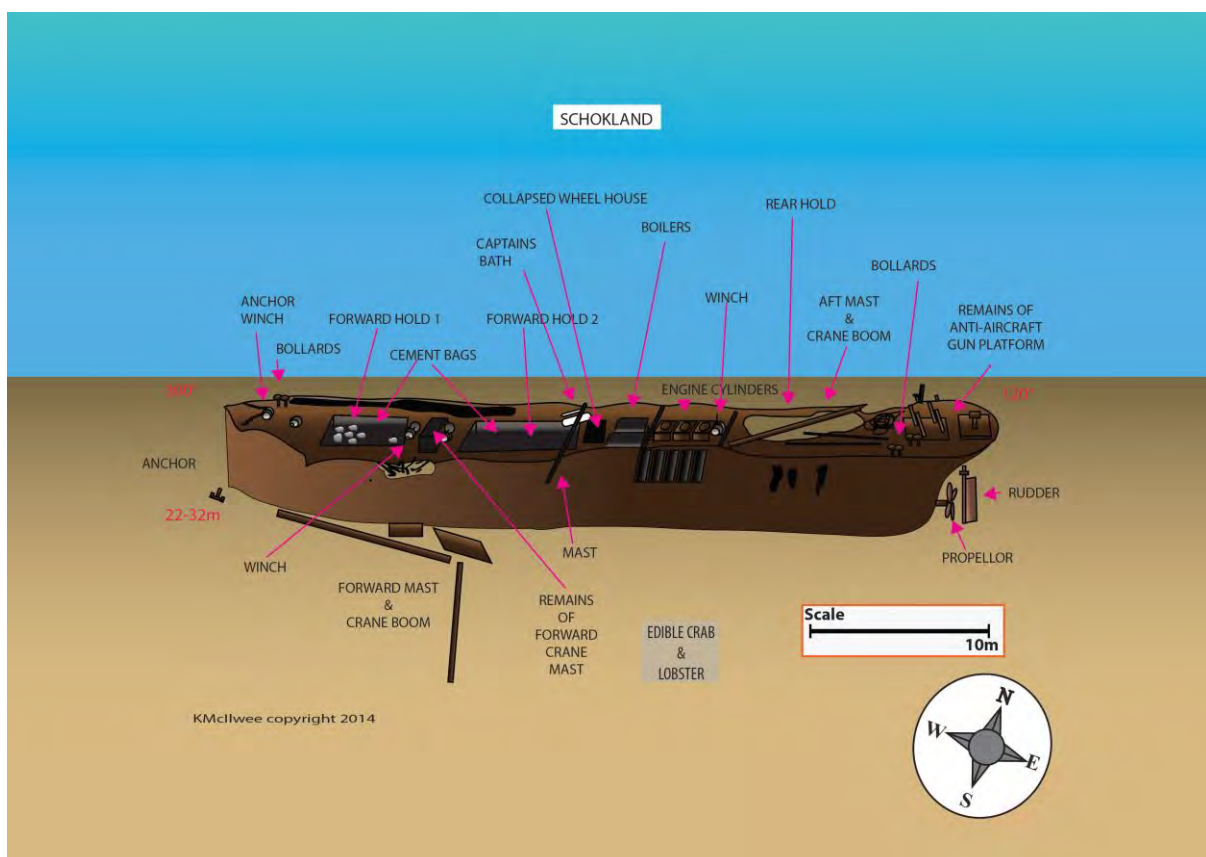
absent here. The Maritime Officer Roger Hills and Jon Carter from Jersey Heritage, met with us in December, to discuss the situation and our proposals for the future. The MSP information is massively out of date and the map irrelevant.

I have already submitted a separate response to this through your feedback portal but include it again here.

From our research and numerous visits to the remaining wrecks, there is strong evidence that they provide a window on our heritage, acting as time capsules that reveal the importance of the maritime environment in the shaping of our culture. Also, data gathered by JMC demonstrates that the wreckages are functioning artificial reefs populated by high biodiversity including rare and unique species, providing protection for mobile juvenile communities, and acting as dispersal stepping stones. These factors align with the JMSP vision.

If, as I would hope the intention of 10.8 is, to formally recognise what remains, then potentially the second question is; how do we intend to document and monitor these sites while they still exist? Potentially should we be compiling a record that highlights their function within the JMSP?

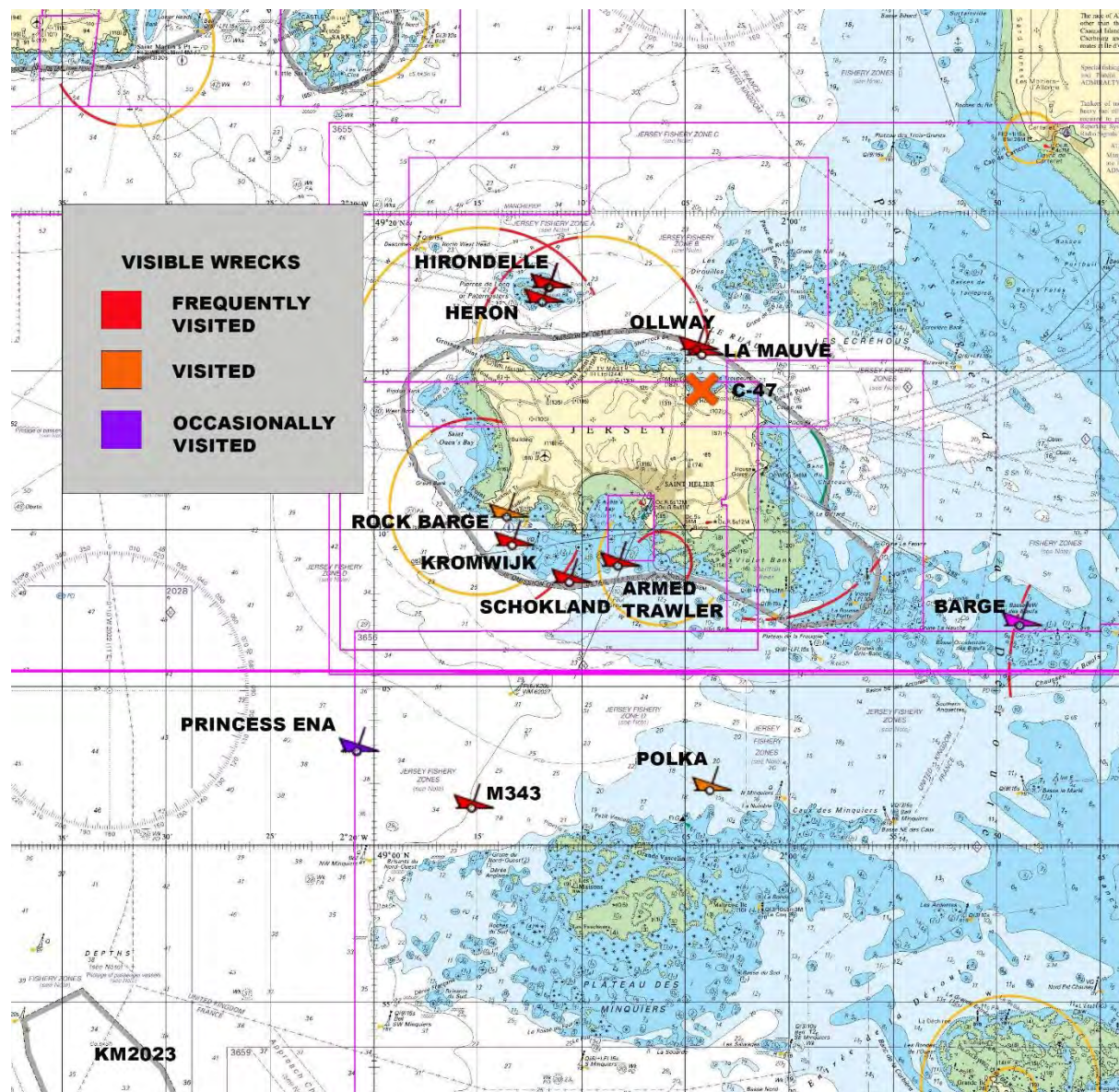
I am not sure whether 10.8 clearly aligns with those objectives. As you astutely observed, preserving the wrecks for those wanting to visit without that turning into total exclusion is challenging and if not handled carefully, could result in legislation that prevents divers from exploring the sites. This is an important consideration.



Important questions need to be addressed. Can we maintain access while preventing the further removal of artefacts or destruction cause by activities that are causing structural damage and accelerating decomposition? Could we include the sites as exclusion areas for mobile gear and pot

lines? As an example, protective solution, mooring points could be placed secured to blocks a few metres away from the wrecks, maintained and clearly marked.

The Schokland wreck diagram used in the JMSP could be clearer and more informative, has a key without explanation, is out of date and is copyrighted by the author. I would be happy to provide an updated free version of my diagram, see above.



The known wrecks map (10d) perhaps is misleading, as most sites marked indicate where ships and aircraft sank but as most vessels were fragile structures, very little that corresponds with most symbols visibly remains. The key to the diagram could be enhanced and be revised to better convey sites where visible wreckage remains. (I enclose a suggested alternative).

Potentially with some funding help from various sources, JMC could create short videos on each of sights that can be viewed by those interested in the wrecks and their history.

(JMC has been surveying and fulfilling Action CH7a and holding discussions related to CH7b and CH7c since 2015).

Action RT3b Examining this from a Ramsar and personal aspect, this should perhaps show positive and meaningful commitment that the public can identify with: '*the government will undertake a program that will improve and enhance beach and recreational opportunities within the St Helier area*'. For example where is the recognition of the Ramsar area within the Town boundary or proposals to encourage activities along Greve D'Azette? To improve quality of life we need the development of marine linked educational facilities, that explore and utilise the harbours, inter-tidal pools and adjoining beach area, enhancing awareness and the healthy mind and body benefits. Cycle routes should be set up to allow safer access and reduce demands for parking.

12.2 Action XX '*As this work is essential, improvements to coastal defences should where possible include improved footpaths, cycle lane and possibly parking*'.

12.3.2 No ground proofing of proposed cable sites looking at the impact on OSPAR defined important habitats.

End Ref EB/NB/12 data on the Sauvage reef and many other sensitive areas has been published by JMC

Thank you.

[REDACTED]

Jersey Marine Conservation

[REDACTED]



**OPINION OF THE CRPMEM OF BRITTANY ON THE DRAFT
OF JERSEY MARINE SPATIAL PLAN (JMSP)**

The CRPMEM appreciates the clarity of the documents submitted for consultation and on which this opinion is based. It considers that these documents provide an enlightening vision of the guidelines for the protection and enhancement of the environment, as well as for the development of activities envisaged in the marine area of the Bailiwick. It regrets, however, that the documents underpinning the arguments developed in the draft report submitted for public consultation are not available. This makes it impossible to assess the scientific basis for the proposed protection measures and restrictions on activities such as professional fishing.

The CRPMEM appreciates the fact that the Jersey's planning process is taking place at a time when France is undertaking a major public debate on this issue. The CRPMEM points out, however, that the French waters adjacent to the Bailiwick are already covered by planning documents (Documents Stratégiques de Façade) adopted in particular under Directive 2014/89/EU. Taking them into account in the JMSP would have been an added value, particularly in terms of the coherence of public planning policies in the Golfe Normand Breton, and as an ecological entity in its own right. Similarly, the dossier submitted for consultation does not enable us to assess the stakes for French professional fishing in the context of the Jersey's planning process. In particular, the presence of French fishermen in Jersey waters appears too anecdotal through the rights put in place after the Brexit.

About the management of fishing activities to protect the environment :

The JMSP proposes the introduction of a three-tiered framework for the specific supervision of professional fishing activities aimed at protecting the marine environment and the resources dependent on it. This framework proposes to establish a supervisory regime that goes beyond the current regulatory framework. The CRPMEM regrets the failure to take into account the activity of French vessels in the description of current fishing trends in Jersey waters. No assessment of the socio-economic impacts of these three new regimes has been carried out within the framework of the JMSP. The CRPMEM demands that this aspect be considered before any decision is taken on regulatory changes, and asks that this assessment be coordinated with the French authorities and consulted with all stakeholders. It is at the disposal of the authorities to provide its expertise on the activity of the Brittany's fleets, but also on the state of fishery resources in the waters of the Normano-Breton Gulf.

The CRPMEM questions the merits of the proposed ban on dragging in submarine cable sectors, and calls for it to be withdrawn from the JMSP. Over and above the socio-economic impact, which has not been assessed within the framework of the JMSP, but whose negative consequences for the activities of French vessels are obvious given their location and geometry, the CRPMEM questions this measure on two counts. The first is linked to the history of submarine cable installation, which was completely buried precisely to enable the maintenance of dragnet activities. The second is linked to the objective of protecting the seabed. While the extension of the boundaries of the Marine Protected Areas appears to be well founded on scientific grounds, there is no scientific justification

for banning dragging in these areas. The information presented on the habitats of interest and justifying their protection does not mention these sectors as being of particular ecological interest.

About the offshore wind farm project in the southwest sector of Jersey waters :

By the end of 2024, France has undertaken to draw up a spatial plan for the development of offshore wind power between 2035 and 2050. Given this planning context, the CRPMEM is asking for this process to be truly integrated at the scale of the Normano-Breton Gulf. The proximity of the Saint-Brieuc Bay wind farm and French waters likely to host new MRE projects calls for a fully integrated approach to this development. To this end, consideration should be given to setting up bilateral exchanges with the French authorities as part of a regional dialogue on the subject (in particular on the aspects of siting, connection and consideration of environmental, socio-economic and cumulative effects). As stated in the methodology, the JMSP principle requires that "the needs of stakeholders be taken into account".

The deployment of MREs in Jersey waters carries the real risk of further undermining the fishing capacity of French vessels in the sector, capacity already largely undermined as a result of the Brexit agreement in Channel Island waters and the siting of the Saint-Brieuc wind farm in French waters. Professional fishermen and the scientific community have also repeatedly pointed to the lack of knowledge about the direct and indirect impacts of marine renewable energy deployment on fishery resources and the environment. Aspects such as habitat disturbance and loss, changes in current patterns, disruption of species' biological cycles, noise/electromagnetic fields/vibration, discharges into the environment due to infrastructure maintenance, etc., are still being questioned and/or need further investigation.

The CRPMEM requests that the approach to deploying MREs in Jersey waters considers and integrates the feedback from the Saint-Brieuc Bay project on the one hand, and on the other, respects the commitments made in the Trade and Cooperation Agreement (article 502 of the TCA) concerning the commitment of each party to authorize the vessels of the other party to fish in its waters with constant effort in relation to the reference period 01 02 2017 and 31 01 2020.

The CRPMEM would like to point out that the Avoid Reduce Compensate (ERC) approach has long been adopted in MRE projects in France and many other European countries. This approach ensures that the effects of projects (particularly cumulative effects) are taken into account, that their impact is assessed and that decisions are taken to minimize, reduce and, where necessary, compensate for them. The CRPMEM calls for a coherent approach, particularly in a sector where the marine environment, fisheries resources and socio-economic activities affected by different projects are shared.

A number of points relating to the Jersi wind farm project need to be clarified, in particular with regard to the consideration given to professional fishing activities. While the JMSP states that additional economic benefits will be studied (particularly seaweed farming), the subject of other activities such as fishing is not mentioned. The CRPMEM points out that coactivity with fishing activities prevailed for the Saint-Brieuc windfarm park, resulting in numerous exchanges with government departments and project developers in order to integrate the maintenance of activities into the architecture of the project, right from the earliest phases of the administrative procedures.

The CRPMEM reiterates its willingness to take into consideration feedback from the Saint-Brieuc project, and to draw inspiration from the procedures implemented to minimize the impact on fishing activities.

Rennes, January 25, 2024

The President of the CRPMEM of Brittany,
Olivier LE NEZET