



Dr Ken Milne
Director of Environment
DEFA, Thie Slieau Whallian
St Johns, IM4 3AS

Monday, 06 November 2023

Dear Ken,

Re: Review of Areas of Special Scientific Interest (ASSIs) procedures

Manx Wildlife Trust (MWT) very much welcomes this opportunity to provide a response to the current review of DEFA's ASSI procedures. We value the importance of the work of the Ecosystem Policy team in designating ASSIs and are delighted that this timely review is underway to ensure best practice is delivered for our Island nation, a UNESCO Biosphere Reserve.

MWT are uniquely qualified to discuss the intricacies of this important issue – we own and manage six pieces of land within ASSIs, more than any other non-Government body in the Island. We believe that the completion of the ASSI network is a fundamentally important deliverable, which supports several other work programmes including our Biodiversity Strategy, Climate Change Action Plan, Agri-Environment Scheme (AES), our obligations under the Convention of Biological Diversity, and, crucially with the rise in Environmental Social Governance (ESG), our economic development. We therefore take this opportunity to advocate strongly for increased resources to be allocated to quickly complete our ASSI network and ensure its long-term effective management going forwards.

MWT's POSITION ON ASSIs: MWT believe that ASSIs are our single most effective designation in our network of terrestrial protected areas. They are essential in achieving *no net loss* of biodiversity, and equally important in facilitating nature's recovery. As is evidenced globally, a well-managed, resourced and ecologically representative suite of protected habitats provides our most effective tool in halting nature's decline. These habitats contain a disproportionate abundance and variety of our wildlife owing to their development and/or management over centuries or millennia. MWT strongly believe that our existing (and candidate) ASSIs are the jewels of our natural heritage, reflected in the twin status that designated sites enjoy as *Biosphere Core Areas*.

Since the Isle of Man's initial ASSI site identification process began in 1974, there has been a markedly slow pace of designation. As a result, many sites have been severely, sometimes irreparably damaged. Important sites have been completely and irreversibly destroyed; the Rhendhoo Curragh for example, was an early candidate for protection, however today not a trace remains. Even designated sites are often a shadow of their former glory; both the Grenaby Garey & Ballaugh Curragh ASSIs only designated part of the original area of ecological note first proposed owing to considerable habitat loss during the time taken to designate. In the absence of a finalised network of protected areas, this damage potentially continues to this day.

We have concern that the Island is very far behind schedule in meeting our national targets and international *obligations*. We are significantly behind our neighbours in our rate and coverage of ASSI designations and far from achieving either *no net loss* of biodiversity or *nature's recovery*.

There remains much to designate as an ASSI in the Isle of Man: many habitats of high ecological value have no formal protection at all. We remain far from having a protected area network fully representative of the whole variety of Manx habitats whereby all eligible sites have been designated. There doesn't appear to be any identified, funded, and prioritised route to completion. For example, only a single northern dub is within an ASSI, from perhaps a hundred or more examples. Our current network does not include our largest seabird colonies, or a single ecological site from our industrial heritage (despite their international importance), nor our largest and finest estuary (complete with reedbed, saltmarsh, intertidal mud, and brackish watercourse). We believe much important work must be done.



We estimate that at the rate of designation to date, it will take 142 years to complete the Isle of Man ASSI network. We believe that a significant contributor to this slow progress is the resource constraints within DEFA, which we request should be addressed during this review. For example, today, there are only 1.5 full time equivalent (FTE) DEFA biodiversity policy officers (compared to 3 FTE some ten years ago), working across an entire (albeit small) nation. This small team faces competing internal, local, national, and international responsibilities, which elsewhere would be handled by numerous agencies. Sadly, owing to their many commitments, ASSI designations (which can take many months) are unable to be prioritised. Any opportunity for the process to be streamlined and sped up, with increased staffing and enhanced budgetary resource should be highlighted by this review. In addition to designations, we wish to highlight the current inadequacy of resource in terms of delivering the required landowner liaison (including crucially with farmers), management agreements, monitoring, and enforcement.

PRESENT ISSUES WITH DESIGNATIONS: From our many dealings with land managers including farmers across the Island, we are aware that many (including, importantly, several farmers) are very comfortable with the principle of ASSIs and their designation and management. We believe that they form the silent majority. However, we know that these sentiments are not universally held, and we fully respect this. We wish to highlight, however, that whilst some of these voices are loud and powerful, we believe they represent the minority of our Island population. It would be useful to have a better measure of this.

We understand, therefore, that designation remains difficult. Other factors include the lack of use of the compensation payments (via Section 29 of the Wildlife Act) and what we believe are currently inadequately low ASSI management rates. We recommend that the ecological value of these sites must be matched in economic terms. For nature to thrive we must seek a system where the land managers are eager for well-managed designations because it makes economic sense for them. The incredible importance of our ASSIs is not reflected in the level of financial support currently offered under management agreements, however, thankfully there is unique opportunity today in the Isle of Man to correct this via better linkage with the AES for farmed ASSIs. The Isle of Man has the potential to lead the way with our AES and ASSIs if we work positively with our farmers and reward them appropriately.

We believe that to achieve *30 by 30* (“30% of our land managed for nature by 2030”) the existing ASSI process must considerably increase its present pace, be prioritised against firm scientific evidence, with the most important and at-risk sites prioritised first. Designations should be objective and not be subject to political or external influence. This review must please not recommend any watering down or compromise of the existing process, which is sound and based on a 1981 Act of the UK Parliament that is both extant and resoundingly fit for purpose. In December 2022, Tynwald unanimously agreed with us that our wildlife is in crisis. Therefore, in line with our UNESCO Biosphere status and ambitions, wildlife must come first and foremost in the designation process but also recognising that land managers need appropriate financial support in this collective endeavour.

We strongly recommend that these existing procedures remain in situ excepting any newly identified efficiencies. We reiterate our wholehearted support for ASSIs and believe that more resource must be found to make this important designation layer a success. We hope that this review will identify a realistic and well-resourced delivery program for *30 by 30*. Tynwald has declared that nature is in crisis – we must now increase our efforts to achieve a complete, coherent & well-resourced network of ASSIs by 2030.

Lesh yyearreeyn share – with best wishes,

Leigh Morris – CEO

Manx Wildlife Trust | Treisht Bea-Feie Vannin