

**WHETHER TO ESTABLISH A MARINE PROTECTED AREA IN THE
BRITISH INDIAN OCEAN TERRITORY**

CONSULTATION REPORT

Rosemary Stevenson, Consultation Facilitator

CONTENTS

	Page
List of Abbreviations	3
Executive Summary	4
A. Introduction	6
<i>Scope of the Consultation</i>	6
<i>Background</i>	6
<i>Questions on which views were sought</i>	7
B. Conducting the Consultation Exercise	8
<i>How the consultation was carried out</i>	9
<i>Summary of the response:</i>	
<i>Numbers</i>	9
<i>Composition of respondents</i>	10
C. Key Findings	12
<i>Support for Marine Protection in Principle</i>	12
<i>The Consultation Proposal</i>	12
<i>Support for Option 1</i>	12
<i>Support for Options 2 and 3</i>	14
<i>Support for none of the listed options</i>	15
<i>Opposition without alternative proposal</i>	15
<i>'Option 4'</i>	16
D. Summary of Responses	17
<i>The consultation process itself</i>	18
<i>The Chagossian community</i>	18
<i>Regional interests and concerns</i>	19
<i>Enforcement of an MPA</i>	20
<i>Costs associated with an MPA</i>	20
<i>Yachting interests</i>	21
<i>Piracy</i>	22
<i>Diego Garcia and the US base</i>	22
<i>Bycatch from commercial fishing, including sharks and fragile species</i>	23
<i>Fish stocks</i>	24
<i>Reputational issues</i>	25
<i>Other proposed environmental measures</i>	25
Annex 1: List of Contributors	27

List of Abbreviations

The following abbreviations are used in this report.

BIOT: *British Indian Ocean Territory (also referred to as the Chagos Archipelago or Chagos)*

CEN: *Chagos Environment Network*

EEZ: *Exclusive Economic Zone*

EPPZ: *Environmental Preservation and Protection Zone*

FCMZ: *Fisheries Conservation and Management Zone*

FCO: *Foreign and Commonwealth Office*

IOTC: *Indian Ocean Tuna Commission*

IUCN: *International Union for Conservation of Nature*

MPA: *Marine Protected Area*

MRAG: *Marine Resources Assessment Group*

NGO: *Non-governmental Organisation*

EXECUTIVE SUMMARY

1. The Consultation, which ran from 10 November 2009 to 5 March 2010, sought to explore whether creation of a marine protected area (MPA) in the British Indian Ocean Territory (BIOT - also known as the Chagos Archipelago) would add value to the protection already in place in the area. It was carried out in accordance with the criteria of the Government's Code of Practice on Consultation.

2. Views were sought on whether respondents thought an MPA should be created in the BIOT. They were asked which of three options – *option 1, a full no-take marine reserve for the whole of the territorial waters and Environmental Preservation and Protection Zone (EPPZ)/Fisheries Conservation and Management Zone (FCMZ); option 2, a no-take marine reserve for the whole of the territorial waters and EPPZ/FCMZ with exceptions for certain forms of pelagic fishery (e.g., tuna) in certain zones at certain times of the year; or option 3, a no-take marine reserve for the vulnerable reef systems only* - they considered best, or whether they could identify other options. They were asked what views they had on a number of potential conservation, climate change, scientific and development benefits, and what importance they attached to them.

3. The consultation also invited views on any other measures, beyond marine protection, which should be taken to protect the environment in BIOT.

4. The FCO's view is that this is a remarkable opportunity for the UK to create one of the world's largest marine protected areas and double the global coverage of the world's oceans benefiting from full protection.

5. The response to the consultation was high, with over a quarter of a million people registering a view. The great majority of these responses came in the form of petitions, which offer limited opportunity for substantive comment from individual respondents. However, different means of contribution, both oral and written, did provide opportunity for fuller expression of substantive views, and these attracted several hundred responses providing greater detail.

6. The response was wide ranging, with a global reach. It included inputs from private individuals, academic and scientific institutions, environmental organisations and networks, fishing and yachting interests, members of the Chagossian community, British MPs and peers and representatives of other governments.

7. The great majority of respondents – well over 90% - made clear that they supported greater marine protection of some sort in the Chagos Archipelago in principle. However, views on this proposal were more mixed, covering a wide spectrum of views. Responses did not confine themselves to the options listed in the Consultation Document.

8. The main difference between the responses was their view on potential resettlement of members of the Chagossian community, and whether this question should be tackled before designation of any MPA, or whether changes could be made later if circumstances changed, in an MPA agreed, as the Consultation

Document suggests, in the context of the Government's policy on the Territory, without prejudice to ongoing legal proceedings.

9. Of those who supported one of the three listed options the great majority supported Option 1, *a full no-take marine reserve for the whole of the territorial waters and Environmental Preservation and Protection Zone (EPPZ)/Fisheries Conservation and Management Zone (FCMZ)*. The reasons given were generally very much in line with the conservation, climate change and scientific benefits set out in the Consultation Document. A number also highlighted a legacy element, as well as the opportunity to show leadership and provide an example for others, while contributing to meeting a number of global environmental commitments.

10. In terms of numbers, support for options 2 and 3 was limited. However, they were universally the choice of the Indian Ocean commercial tuna fishing community, as well as a number of regional interests. While agreeing that there was a strong case for protecting the fragile reef environment, this group considered that the scientific case for the extra benefits of option 1 was not strongly demonstrated and the group did not want to see a negative economic impact on the tuna industry. In addition, a limited number of private individuals thought that controlled, licensed fishing at around the current level was sufficient protection and was not causing significant decline or degradation.

11. A significant body of response did not support proceeding with any of the three listed options at the current time. Of this group, some, including most but not all of the Chagossian community, argued simply for abandoning or postponing the current proposal until further consultation and agreement could take place, while others proposed one or another different option (a 'fourth option'), which sought to take account of Chagossian (and in some cases other regional) requirements.

12. As well as their headline comments on preferred options, respondents raised a number of issues of interest or concern to them. These included: the consultation process itself; the rights and interests of the Chagossian community; regional interests and concerns; enforcement of an MPA; costs associated with an MPA; yachting interests; piracy; Diego Garcia and the US base; bycatch from commercial fishing, including sharks and fragile species; fish stocks; reputational issues; and other proposed environmental measures. These are described in more detail in a final section which summarises the issues covered in responses received to each of the Consultation questions.

A. INTRODUCTION

Scope of the consultation

1. This Consultation sought to explore whether creation of a marine protected area (MPA) in the British Indian Ocean Territory (BIOT - also known as the Chagos Archipelago) would add value to the protection already in place in the area. The consultation is in response to the proposal of the Chagos Environment Network, 'The Chagos Archipelago: its nature and future' which recommends the establishment of a conservation area in the British Indian Ocean Territory. The purpose of the consultation was to seek views from stakeholders and interested parties.

Background

2. The BIOT is situated in the middle of the Indian Ocean and is made up of about 55 tiny islands in over half a million square kilometres of ocean. The Great Chagos Bank is the world's largest atoll. The islands, reef systems and waters of BIOT in terms of preservation and biodiversity are among the richest on the planet and it contains about half of all the reefs of this ocean which remain in good condition. There are about 10 Important Bird Areas. It has the Indian Ocean's most dense populations of several seabird species. It also has remnants of Indian Ocean island hardwoods and contains exceptional numbers of coconut crabs and undisturbed and recovering populations of Hawksbill and Green Turtles.

3. The area has already been declared an Environmental (Preservation and Protection) Zone with legislation in place to protect these natural resources. These include strict controls over fishing, pollution (air, land and water), damage to the environment, and the killing, harming or collecting of animals. Some of the most important land and sea areas have already been set aside for additional protection. Most of the lagoon areas and a large part of the land area of Diego Garcia are protected as Restricted Areas, four Special Conservation Areas and a Nature Reserve. Strict Nature Reserves cover the land and surrounding reefs and waters of the islands of the Great Chagos Bank and a large part of Peros Banhos Atoll.

4. The Territory is also subject to further levels of internationally binding legal protection. This includes the designation of part of Diego Garcia as a Wetland of International Importance under the Ramsar Convention; the Whaling Convention (including an Indian Ocean Whale Sanctuary); the Law of the Sea Convention (with provisions to protect fish stocks); the Indian Ocean Tuna Commission (IOTC); CITES (regulating trade in wildlife, including corals); and the Bonn Convention (with provisions to protect marine turtles and cetaceans).

5. The Consultation Document points out that any decision to establish a marine protected area would be taken in the context of the Government's current policy on the Territory. It would not affect the UK Government's commitment to cede the Territory to Mauritius when it is no longer needed for defence purposes. Any decision that may follow for the establishment of a marine protected area is without prejudice to the outcome of the current, pending proceedings before the European Court of

Human Rights. This means that should circumstances change, all the options for a marine protected area may need to be reconsidered.

6. An Impact Assessment for the proposal has been written and is included as Annex A in the Consultation Document.

Questions on which view were sought

7. The consultation invited respondents to give their views on four questions, set out below:

1. Do you believe we should create a marine protected area in the British Indian Ocean Territory?

If yes, from consultations with scientific/environmental and fishery experts, there appear to be 3 broad options for a possible framework:

(i) Declare a full no-take marine reserve for the whole of the territorial waters and Environmental Preservation and Protection Zone (EPPZ)/Fisheries Conservation and Management Zone (FCMZ); or

(ii) Declare a no-take marine reserve for the whole of the territorial waters and EPPZ/FCMZ with exceptions for certain forms of pelagic fishery (e.g., tuna) in certain zones at certain times of the year.

(iii) Declare a no-take marine reserve for the vulnerable reef systems only.

2. Which do you consider the best way ahead? Can you identify other options?

3. Do you have any views on the benefits listed at page 11? What importance do you attach to them?

4. Finally, beyond marine protection, should other measures be taken to protect the environment in BIOT?

8. The FCO's view is that there is sufficient scientific information to make a convincing case for designating most of the Territory as an MPA, to include not only protection for fish-stocks but also to strengthen conservation of the reefs and land areas. The justification is based primarily on the size, location, biodiversity, near-pristine nature and health of the coral reefs, likely to make a significant contribution to the wider biological productivity of the Indian Ocean. It would have a wide diversity of unstudied deepwater habitats. There is high value to scientific/environmental experts in having a minimally perturbed scientific reference site, both for Earth system science studies and for regional conservation management. MPA designation for BIOT would safeguard around half the high quality coral reefs in the Indian Ocean whilst substantially increasing the total global coverage of MPA's. MPA designation would be consistent with existing BIOT conservation policies, providing a cost-effective demonstration of the UK Government's commitment to environmental

stewardship and halting biodiversity loss. If all the BIOT area were a no-take MPA, it would be the world's largest site with that status, more than doubling global coverage with full protection.

9. The Consultation Document also notes that the fisheries in the BIOT are currently a loss-making business for the BIOT Administration. The average yearly income from the purse-seine/long line fishery is usually between £700,000 and £1 million. Only one company presently fishes on the reefs (inshore fishery) and this brings in a very small income to BIOT Administration. The profits from fishing are ploughed back into the running costs of the BIOT Patrol Vessel, the Pacific Marlin. The income does not meet the entire costs of running the vessel. Consequently the Administration's costs have to be subsidised from the FCO's Overseas Territories Project Fund.

10. The Consultation was intended for anyone with an interest in the British Indian Ocean Territory or the Overseas Territories in general, and anyone with an interest in the protection of the environment.

B. CONDUCTING THE CONSULTATION EXERCISE

How the consultation was carried out

11. The Consultation was carried out in accordance with the criteria of the Government's Code of Practice on Consultation ('the Code of Practice'), which are printed as Annex B of the Consultation Document.

12. The consultation period began on 10 November 2009, with the publication of a Consultation Document, and ran until 5 March 2010, following extension from its original 12 February deadline to allow everyone with an interest in the issue to contribute. Efforts were made to bring the consultation to the attention of all those for whom it was intended, by dissemination of the consultation document through website, representative groups and directly to representatives of parties with a known interest. Recipients were encouraged to let the FCO know if they thought there were other ways to increase awareness of the consultation.

13. The Consultation Document described the scope of the consultation and the questions on which it sought views, and provided relevant background information in a number of annexes, in order to make the document self-contained.

14. It also explained how to become involved in the consultation. Addresses were provided for responses by post or e-mail. In addition, and in line with the Code of Practice's emphasis on accessibility, a series of meetings were planned, in the UK and with stakeholders in the Seychelles and Mauritius, in particular to reach members of the Chagossian community. (Meetings in the Seychelles also covered a number of other stakeholders based there.) An independent facilitator was appointed to manage these meetings, and to record views expressed. Meetings were held with individuals or with representative groups, with emphasis on encouraging participants to describe their views as fully and openly as possible.

15. Meetings in the Seychelles and in the UK took place in late January and early February. In the event it was not possible to visit Mauritius for discussions in person, and consultation with representatives of the Chagossian community there was held by video-conference in early March instead.

16. The option of responding on a confidential basis was offered, to ensure no-one was dissuaded from responding because they did not want their personal details known, and this option was taken up by a very small number of respondents.

Summary of the response

Numbers

17. The total number of responses to the consultation was very large, with over a quarter of a million people worldwide contributing to it. The vast majority of these numbers came through petitions, which offer only limited opportunity for any substantive comment from individual respondents. However, different means of contribution, both oral and written, did provide opportunity for fuller expression of substantive views, and these attracted several hundred more detailed responses. Overall the responses fell into five different categories:

- About 450 **written responses**, representing a wide range of opinion (including all options listed and a number of different ideas) which provided comment on and explanation of the views they expressed. Some responses represented the views of institutions as well as of individuals, and in the case of individuals in some cases represented the views of more than one person.
- Over 250 responses to an alternative **questionnaire** which included different options from those listed in the consultation document, and provided space for views as well as choices, submitted by the Diego Garcian Society (a group representing some members of the Chagossian community in the UK, but also including a number of responses from Chagossians in Mauritius).
- Outcomes of **oral discussions** and meetings, which reached directly about 100-150 people, mostly through representative groups who spoke for significantly greater numbers; for example, a video-conference with the Chagossian Community in Mauritius spoke to elected representatives of the Chagos Refugees Group, which covers a majority of the community, a number of whom (estimated at least 80 and up to about 140) gathered outside the conference venue. The focus of the oral part of the consultation was on the views of members of the Chagossian community in the UK, Seychelles and Mauritius; a number of Seychelles based environmental and fishing bodies also participated in this way.
- About 225 written **statements of support** (mostly for Option 1 or an MPA without specifying which option) without comment or explanation;
- **Petitions**, by far the largest category in terms of numbers. These included over 221,000 responses co-ordinated by Avaaz, a global online advocacy network; over 27,000 signatures collected electronically from the Chagos Environment Network (CEN) through its 'protect Chagos' website; over 1500

signatures from the Marine Education Trust; and a number of smaller petitions from groups such as visitors to aquaria.

18. The response covers a wide range of participants and a global reach. There is some duplication with, for example, some individuals both signing a petition and responding individually, or some submitting more than one written response as their views developed or they wished to respond to views expressed by another party. As a consultation is not a vote, but a qualitative exercise to collect views and evidence, this is not a cause for concern.

Composition of respondents

19. The Consultation attracted responses from round the world. Given its global advocacy nature it is not surprising that Avaaz' petition covers responses (in many cases in single figures) from 223 countries. But there is also a wide reach within categories such as the written responses with comments, including respondents from within the Indian Ocean region, from across Europe, the US and Canada, Australasia, Japan and other British Overseas Territories. Within the UK there is broad regional reach.

20. Most responses come from **private individuals**. Just over 70% of those who provided written responses with comments fall into this category, as do the vast majority (over 90%) of those who submitted statements of support without providing any comment beyond recording their preferred option. A number of these individuals are people who have had the opportunity to visit the area, in some cases through diving interests; some ex-military (especially naval) personnel; individuals with a previous connection with the administration of the BIOT; and those with wider marine conservation or broad environmental interests. A group of schoolchildren responded, some with nicely illustrated comments.

21. The **Chagossian community** responded in high numbers both orally and in writing, reaching several hundred people. Members of the Diego Garcian Society and the Chagos Island Community Association, both organisations representing some members of the Chagossian community in the UK, responded in writing and in the case of the Diego Garcian Society also orally, through a meeting held in Crawley in early February. That group had developed a questionnaire, based on the consultation document, which was completed by over 250 Chagossians, while the Chagos Island Community Association submitted a detailed covering letter with over 70 supporting signatures. The Chair and Vice Chair of the UK Chagos Support Association also wrote. The Chagos Community Association in the Seychelles both wrote and discussed the consultation at a meeting in Victoria, Seychelles. Chagossians in Mauritius represented by the leader and elected representatives of the Chagos Refugees Group, whose membership covers the majority of Chagossians in Mauritius, took part in a video conference in early March, supported by a large group of Chagossians gathered outside, as well as those who joined the discussion. Their legal representative also contributed (orally and in writing), as did the President of the Chagossian Social Committee in Mauritius. In addition a number of Chagossians in Mauritius included their response in the Diego Garcian Society

questionnaire, and a number of Chagossian individuals and Chagossian support groups from the UK, Mauritius and elsewhere signed the petition submitted by the Marine Education Trust.

22. A large number of representatives of the **academic and scientific community** responded on an institutional basis as well as through individual responses from both staff and research students. These have ranged from detailed analytical work to more general remarks, in addition to some individual academics who have written to express a preference but have not made any comment, or have signed a petition, whether or not they have also responded separately. A number of these respondents referenced the work of two conferences, one at the National Oceanography Centre, Southampton, on 5-6 August 2009, which considered the science issues and opportunities of marine conservation in the BIOT, and involved academics, NGOs, UK government, and marine industry stakeholders; and one held at Royal Holloway, University of London, on 7 January 2010, which included NERC supported marine research centres, Universities, NGOs and Chagossians, UK government and marine industry stakeholders, and discussed socio-economic considerations of the establishment and management of an MPA in BIOT.

23. More than 50 **environmental organisations and networks**, including private environmental foundations, consultancies and civil society organisations, including the Chagos Environment Network whose proposal underlies the consultation, have submitted responses, mostly highlighting conservation and biodiversity aspects. A number of **zoos and aquaria** have contributed, many of them taking similar approaches, mainly highlighting marine exploitation. As well as the London Zoological Society they represent zoos and aquaria across Europe and in the USA. A number of **International organisations** mostly with a focus on conservation or on bird or animal protection are also included amongst respondents. A number, such as the IUCN Shark Specialist Group, are specifically concerned with protection of sharks and rays.

24. A number of **fishing companies or their representative bodies** from Europe and Japan, and orally from the Seychelles Fishing Authority and the Indian Ocean Tuna Commission in the Seychelles, set out the perspective from the tuna fishery point of view, particularly the commercial purse seine fishery. Although long line fishing also takes place in the area there was no contribution which focused specifically on that practice, and no input from the small group of fishermen who are licensed to fish on the reef.

25. Subsistence fishing is one of the issues highlighted by one particular sub-group, **yachtsmen/women** sailing the Indian Ocean and using the Chagos islands as a temporary stopping point, in some cases against adverse weather, or as a break in a long voyage.

26. A number of **British Peers and Members of Parliament**, including the All Party Parliamentary Group on the Chagos Islands as well as individual members (some of whom signed the Marine Environment Trust petition) responded, as did a number of **representatives of other governments** and their agencies, including the Foreign Ministry of the Republic of the Maldives and a member of the US navy.

27. While numbers and this broad breakdown of types of respondent are helpful for demonstrating the degree of interest in and commitment to an issue by different groups, and the types of concerns they may have, there are also limitations on their usefulness. The detailed response provided through written comment (in any format) or participation in meetings is helpful in analysing what people's main underlying concerns are, and what sort of policy choices would best address them. The key points highlighted by those who did provide reasons and evidence for their views are described in section C below.

C. KEY FINDINGS

28. Section C will cover the degree of support or opposition, and the main reasons for that, for creating an MPA and for each of the options outlined, as well as for proposed variants or different options which nonetheless aim to provide some conservation/protection element to the area. More detailed discussion of the specific points raised will follow in section D, Summary of Responses (p.17 below).

Support for marine protection in principle

29. Whatever views people took on this particular MPA proposal and the specific options put forward, the great majority of respondents – well over 90% - made clear that they supported greater marine protection of some sort in the Chagos Archipelago in principle.

The Consultation Proposal

30. Despite this broad support in principle, views on this proposal were more mixed, covering a wide spectrum of views. Responses did not confine themselves to the options offered.

31. While it does not feature in all responses, the main underlying issue which divides the responses is the question of Chagossian rights and potential resettlement; for some this is a reason for opposing outright or postponing consideration of the MPA; for some it is a question of further discussion and some potential variation to the terms of the MPA, to reach agreement with the Chagossian community (and other regional stakeholders, especially Mauritius) before any MPA is designated; and for some it is a matter of agreeing the MPA 'without prejudice' (as proposed in the Consultation Document) keeping the question in mind and being ready to change the detail of the MPA as and when necessary.

Support for Option 1

32. While a small number of those who support an MPA (about 30 responses) were not specific about which of the listed options they preferred, most of those who did support one of those options prefer option 1:

(i) Declare a full no-take marine reserve for the whole of the territorial waters and Environmental Preservation and Protection Zone (EPPZ)/Fisheries Conservation and Management Zone (FCMZ).

33. This is the preference of about 75% of letters and e-mails from private individuals who provided reasons for their views, of over 70% of the academic, scientific and environmental respondents and of over 95% of the letters of support without any comment, as well as of the signatories of the CEN petition.

34. Where reasons were given these were generally very much in line with the benefits set out in the consultation document, with some expansion and addition in specific areas and greater emphasis on a legacy and reputational element:

- Conservation benefits, including protection of an ecosystem and its biodiversity largely unaffected by direct human impact;
- Climate change benefits, as a control against which to measure changes in the marine environment elsewhere;
- Scientific benefits in a number of areas of oceanography;
- Use as a scientific reference site in a number of areas;
- As a 'refuge' for species heavily exploited in other parts of the Indian Ocean;
- As a source of increased biomass for other parts of the Indian Ocean;
- In response to concerns about the effects of fishing, particularly in relation to bycatch, which could be significant, and risks to endangered and vulnerable species;
- Legacy and reputational benefits – less than full protection shows lack of commitment;
- The ability to encourage others through demonstrating commitment; and
- A contribution to global environmental commitments including halting the decline of biodiversity by 2010, establishing global marine protection networks by 2012 and restoring depleted fish stocks by 2015.

35. A number of respondents pointed out that the sum of these benefits is even greater than any one of them individually.

36. There is amongst this group a tendency to use campaign type letters, sometimes with slight addition to reflect personal circumstances: there are for example around thirty cases of a letter which begins with marine over-exploitation, continues with long term benefits to coastal communities around the Indian Ocean, and the sustainability of the ocean, talks about the MPA as a reference site for global science, notes that the larger the area involved the more habitat types are covered and the smaller effect from external factors, says tuna fishing should be banned as tuna stocks are declining, and massive bycatch contributes to decline in other stocks, and adds that although costs seem large it is necessary to look at the long-term, legacy element.

37. A small number of individual supporters of Option 1 explicitly added the proviso that it should include fishing rights for resettled islanders, and some noted that its creation should be agreed with involvement of all stakeholders. The CEN petition

does not mention the Chagossian position or that of other regional stakeholders. However, the CEN view, expressed in their separate submission, is that that they are aware of the views of Mauritius and of some Chagossian groups, but consider that it is not disadvantageous to have the islands and their marine areas protected in their entirety now, since arrangements could be modified if circumstances changed.

Support for Options 2 and 3

38. In terms of numbers, there is limited support for either Option 2 or Option 3:

(ii) Declare a no-take marine reserve for the whole of the territorial waters and EPPZ/FCMZ with exceptions for certain forms of pelagic fishery (e.g., tuna) in certain zones at certain times of the year.

(iii) Declare a no-take marine reserve for the vulnerable reef systems only.

39. However, they were universally the choice of the Indian Ocean commercial tuna fishing community in the region: as well as fleets from Europe and Japan who fish in the area, the Indian Ocean Tuna Commission, and officials and representative bodies in the Seychelles shared this view. They noted that the scientific case for the extra benefits of option 1 was not strongly demonstrated and they did not want to see a negative economic impact on the tuna industry, which contributed to their economy. In addition, a limited number of private individuals thought that controlled, licensed fishing at around the current level was sufficient protection and was not causing significant decline or degradation. Although some of this group selected option 2 while others preferred option 3 the main underlying concern was similar: that there was a strong case for protecting the fragile reef environment, but that purse seine tuna fishery (to which, rather than long-line fishing, most comments referred) did not have a negative effect on that. The main arguments were that:

- There is no doubt that it is important to preserve the reef, and to have healthy fish stocks, but options 2 or 3 will do so.
- Purse seine nets did not affect the fragile environment: they did not touch the sea bottom, or cause great disturbance.
- By-catch was estimated at 3%, and not much from fragile species (4 or 5 turtles a year; no dolphins).
- Illegal and unregulated fishing would continue, and that was the main cause of concern. Legitimate fleets could play a role in identifying that; without them costs of policing would increase; satellite monitoring would be needed.
- Valuable information collected and recorded by vessels in the region (for example for helping assess stock) would no longer be available
- Scientific evidence does not demonstrate the case for MPA's as a means of preserving tuna stocks.
- The idea that the MPA would provide a refuge did not work because tuna were migratory and spent only two to three months there, not for breeding.
- Closing off the area would displace efforts and fleets would look for tuna routes outside which may not be as well controlled and monitored.
- It should be for the regional body – the IOTC - to decide appropriate

management measures for the protection and conservation of the Indian Ocean tuna fishery.

- The fishing fleets would feel the removal of Chagos. It would reduce flexibility; at the end of the year there was not much else, especially in the current fluid situation with regard to piracy.

40. A small number of those who generally supported option 1 took the view that openness to fishing could be reviewed after a time if there was appropriate evidence about fish stocks.

41. Some members of the scientific and environment community countered that no-take MPA's did have benefits for stocks of migratory species, even if they were part of the solution, along with other management measures, rather than all of it.

Support for none of the listed options

42. There was a significant body of response, including most members of the Chagossian community, about 13% of other written contributions, a number of participants in meetings in the Seychelles, and the signatories of the Marine Education Trust petition¹, who did not support proceeding with any of the three listed options at the current time.

43. One key characteristic of this group is a reluctance to see change to an MPA at a later date if circumstances change, and a wish to settle details now (whether for or against any type of MPA) through agreement with relevant stakeholders, before any MPA is designated.

44. This body of opinion fell into two distinct groups. One group was opposed to proceeding in any form at this time, thought that further discussion, and ultimately agreement, with all stakeholders was needed and did not offer any view on what the outcome of such discussion might be in relation to an MPA. A second group agreed on the need for further discussion and agreement but put forward an alternative approach (a 'fourth option', of which there are different variants), which they considered to take account of the rights of the Chagossians, and in one version also of Mauritius (which has historic fishing rights as well as future interests).

Opposition without alternative proposal

45. Opposition to this proposal at this time came primarily from members of the Chagossian community in Mauritius, Seychelles and the UK (views expressed orally and in writing)², the Republic of Maldives, and a number of written responses from non-Chagossian private individuals, many (but not all) of whom highlighted the Chagossian position. While not opposing an MPA, a number of scientific and environmental organisations and some private individuals emphasised the

¹ And possibly also the Avaaz petition, which supports an MPA and ban on commercial fishing (i.e. option 1), but refers to working with Chagossians to protect the reefs.

² It is not the view of all Chagossians, some of whom prefer a variant 'option 4', described below.

importance of achieving an outcome agreed by all stakeholders without which the MPA process would be undermined and its long term effectiveness threatened.

46. Within this group there were different strands of thought, expressed through six main reasons for opposition:

- It is premature, and inappropriate, to move ahead with this proposal in advance of the European Court of Human Rights ruling or decisions on Chagos resettlement – it is ‘putting the cart before the horse’ - and with inadequate consultation of the Chagossian community and without agreement with the Government of Mauritius; it put the concerns of nature conservation before the rights of people;
- The proposal fails to allow for Chagossian resettlement and Mauritian and other regional interests from the beginning, and needs to be agreed by all these groups before any designation is made;
- There are outstanding queries about the impact of the proposal on other Indian Ocean states’ interests (particularly on fishing);
- There are queries about the legal basis for unilateral UK actions;
- There are doubts about whether such protection is necessary and adds anything to the protections already in place, rather than unnecessary restrictions (a point made particularly by some members of the yachting community);
- There are concerns about whether there might be a risk of future liabilities (for example because of the effects of climate change) arising from such designation.

47. The possibility that an MPA in any of its proposed forms could be created now with the potential for later change to handle any change in circumstances (as noted by the Consultation Document) was not supported by this group.

‘Option 4’

48. The other strand of opposition to any of the three listed options made suggestions about how Chagossian interests could be handled by including proposals which could in their view avoid having to change the MPA once it is established. One proposal, put forward by the Diego Garcian Society (representing about three quarters of the Chagossian response in the UK, with a relatively small input from Chagossians in Mauritius) proposed a no-take marine reserve for the whole of the territorial waters and EPPZ/FCMZ with exceptions for certain types of pelagic fishery (eg tuna) and artisanal fishing by Diego Garcians and other Chagossians fishing projects only. A broadly similar, if possibly narrower, approach to the livelihood requirements of resettled Chagossians was taken by a number of those (both private individuals and some institutional responses) who said they supported option 1 but favoured provision for sustainable fishing by resettled Chagossians. In some cases they envisaged resettled Chagossians as stewards of conservation in Chagos. This view about potential Chagossian stewardship was shared by the Marine Education Trust, which supported provision for well managed and sustainable utilisation of natural resources alongside conservation and suggested that zoned use that permits the sustainable use of marine resources in

specific reef, lagoon and open ocean areas might be a possibility.

49. Zoned use or a networked approach – not necessarily confined to the needs of Chagossians – received support from a number of quarters. MRAG noted this would still allow declaration of the whole BIOT FCMZ as an MPA, and could provide a framework which would permit military use of the lagoon of Diego Garcia, and any other uses that may be considered in future, whether tourism, visiting yachts, vessels transiting the zone, scientific surveys or other. This general approach was shared by the Environment Ministry in the Seychelles, which took the view that a zoned approach, Indian Ocean wide, was more likely to reach the most important biodiversity ‘hotspots’. The Joint Nature Conservation Committee recommended adopting a zoning approach as the best way to manage a multiple use marine area, with identification of zones based on current best available science. Options based only on no-take policies were not consistent with UK marine conservation practice or global best practice.

50. For others these variants could be incorporated later if needed, as and when circumstances changed, but should not be built in to the original proposal; until circumstances did change, full protection in the form of Option 1 was the right proposal, and did most to conserve the Chagossians’ inheritance until they did return. The Consultation Document notes that the MPA could change if circumstances changed.

51. The section above has covered only the headline findings. A number of topics which respondents have highlighted in their contributions have been mentioned but not elaborated in any detail. These include:

- The consultation process itself;
- The Chagossian community;
- Regional interests and concerns;
- Enforcement of an MPA;
- Costs associated with an MPA;
- Yachting interests;
- Piracy;
- Diego Garcia and the US base;
- Bycatch from commercial fishing, including sharks and fragile species;
- Fish stocks;
- Reputational issues; and
- Other proposed environmental measures.

52. These will be described in more detail below, in the Summary of Responses.

D. SUMMARY OF RESPONSES

53. The following sections highlight some of the key issues which were raised by a

number of respondents.

The Consultation Process

54. The Consultation Document notes that any declaration of an MPA would be made by the BIOT Commissioner, who is not bound by UK Government guidelines on public consultation. However, the Foreign Secretary decided that there is sufficient public interest in the proposal to merit such a consultation. The Consultation process has been conducted in accordance with the government's code of practice on consultation, whose key points are described in Annex B of the Consultation Document. How it has been carried out is described in section B (p8) above.

55. Some respondents have described the process as flawed, for two reasons.

56. The first concerns the information included in the Consultation Document. While the document seeks to be self contained and include necessary information on all matters relevant to the consultation, a small number of respondents have argued that insufficient detail on some matters (for example in relation to resettlement of the Chagossian community) has been supplied to enable stakeholders to reach fully informed views.

57. The second concerns the degree of consultation undertaken with the Chagossian community. While it is acknowledged that efforts have been made to hear the views of the Chagossian community (and that that was the main purpose of the oral consultation) it is considered by some respondents that this is not sufficient. These respondents take the view that it is not sufficient to seek the Chagossian view in the same way as that of the wider public, but that they should have been involved from the outset and should perhaps have been involved in drawing up the options on which a consultation was conducted.

58. Similar concerns were raised about consultation with other Indian Ocean states, particularly Mauritius, and with other regional bodies who have interests.

The Chagossian Community

59. The islands of the Chagos archipelago became British in 1814 and were administered from Mauritius until 1965, when they were detached to form part of the British Indian Ocean Territory. That territory was created to provide for the defence needs of the United Kingdom and the United States. The UK government subsequently gave Mauritius an undertaking to cede the islands to Mauritius when they were no longer required for defence. Following the decision that the islands should be set aside for defence needs, existing copra plantations were run down and closed and arrangements made for the islanders (employees of the copra plantations and their dependants) to be relocated to Mauritius and the Seychelles. (A number now also live in the UK.) Since the mid 1970s there have been a series of legal actions around the questions of right of abode and compensation. The Chagos Community has most recently made an application to the European Court of Human Rights on both these issues.

60. The Consultation Document says that any decision to establish an MPA would be taken in the context of the Government's current policy on the Territory and that under current circumstances the creation of a marine protected area would have no direct immediate impact on the Chagossian community. It says that any decision about an MPA would be without prejudice to the outcome of current, pending proceedings and recognises that, should circumstances change, all the options for an MPA may need to be reconsidered.

61. A number of respondents, including many members of the Chagossian community and their legal representative, expressed a concern that the MPA is an indirect means of preventing Chagossians from resettling, because if fishing were prohibited they would have no means to support themselves after return. It is a non-legal barrier that would be in place even if legal barriers were removed. This is one factor behind the thinking of those, including a large section of the Chagossian population in the UK, who supported an alternative option 4, which allowed for fishing in the area by Chagossian groups.

62. Others, including the Chagossian population in Mauritius, thought it wrong that decisions should be made by anyone other than Chagossians, or forced upon them unilaterally. They felt the Chagossian community had not been adequately consulted at an early stage, and their views were being ignored. They thought that the whole question of an MPA could not be separated from questions around resettlement and right of abode. They felt that this proposal put the rights of marine life before the rights of humans while they should go hand in hand (a point made by a number of the written responses).

Regional Interests

63. A number of other Indian Ocean States and their institutions have interests in the impact of an MPA in the BIOT. Most have to do with fishing and with Indian Ocean-wide protection of ocean resources. One respondent noted that the Maldives' EEZ overlapped that of the BIOT, but most comments came from oral discussions in the Seychelles.

64. Speaking from an environmental point of view, one Seychelles official noted that it would be more effective for littoral states to agree together on large ecosystem protection, possibly for the whole Indian Ocean, with some areas protected by a 'no take' policy but others open to tuna (and other) fishing. The key would be identifying and protecting the biodiversity 'hotspots'. Representatives of the Seychelles Fishing Authority confirmed that a larger area, which would not necessarily be the Chagos Archipelago, could give more protection - Chagos itself was not a major tuna area, with a short season – and that there were projects underway in the Indian Ocean to consider the best location and size of protected areas.

65. Nonetheless, the Seychelles would feel any impact on the tuna industry and would find it hard to support anything that had adverse economic implications. A representative of the Indian Ocean Tuna Commission agreed that fishermen in the region would feel the removal of Chagos. It would reduce flexibility; around the year end and in January there were not many other areas to fish tuna. Although Chagos did not give a good catch every year it provided an option; this was particularly

important in the current fluid situation with regard to piracy, which he thought was not likely to disappear quickly. There would likely be an economic impact, as fisheries operated with small financial margins. And it would not stop illegal fishing, which was the biggest problem.

Enforcement

66. A significant number of respondents in all groups highlighted the need for effective enforcement, to prevent illegal fishing in the zone, and ensure the MPA was not just a 'paper park' without practical impact. Views were mixed about how much illegal fishing goes on in the area at present, but several examples were provided to confirm that there is a problem, including in relation to fishing for sharks and sea cucumber.

67. The tuna fishing community noted that at the moment they were able to help detect and report such activity, and a number of other groups, especially yachts and private individuals, also supported the idea that having some legitimate vessels in the area (whether or not for fishing) helped as a visible deterrent, citing evidence from the Galapagos. However, these respondents did not necessarily support continuation of commercial fishing, but the presence of yachts, or vessels for liveaboard diving holidays. Most respondents took the view that if no fishing were allowed at any time it would be easier to identify illegal vessels, although many also acknowledged that illegal fishing was likely to increase (and at least continue, regardless of whether a no-take MPA was announced).

68. The BIOT Administration currently has one patrol vessel, the Pacific Marlin, whose running costs are partially offset by income from fishery licensing. While some observed that without fisheries some of her current responsibilities would be reduced, it was widely thought that this would not be sufficient for the ongoing enforcement task. Proposals to strengthen this included having two or three smaller, more nimble vessels, and light aircraft or satellite monitoring to support. A number of respondents considered that Chagossians could play a role in future enforcement. Another suggested that US military monitoring could play a role in focusing on location of fisheries. Additional costs were acknowledged (and detail discussed below). High penalties for breach (including confiscation of catch, or of vessel) to act as a deterrent, were encouraged.

Costs

69. Only one respondent reflected that funding may not be currently available in the BIOT administration for increased spending on enforcement (an activity supported by a large number of respondents), one person referred to potential financial difficulties, and one observed that even declaring an MPA was not a cost-free activity. A number acknowledged that costs would rise while income from fishing licences would fall, and a small section of those people thought that for tuna fishing the relative costs needed to be balanced with limited benefits. For most respondents, however, the costs of creating a no-take MPA were thought to be small, and far outweighed by benefits. One of the option 1 campaign type letters specifically makes the point that one should look at the long term benefits rather than the short term costs.

70. For some this cost was simply something that government should take on; the sums were considered to be insignificant in comparison to other areas of social spending (child benefit, and bailing out banks were mentioned) while the benefits should be looked at for the long term.

71. There were a number of suggestions about other potential sources of funding if the BIOT administration were not able to take it on. One person suggested that allowing eco-tourism, such as licensed diving tours, could be a possible source of contribution. Another thought there may be some scope to use carbon trading schemes, or that the MPA might have a carbon sequestration value. One person suggested that the US should contribute, perhaps as part of the leasing of Diego Garcia. A number of people thought private or charitable foundations might be a plausible source of funds, while a few suggested the UN or international agencies, while acknowledging that they may not want to take this on, and observing that progress on the MPA should not depend on success in this.

72. For the great majority of respondents of all types cost was not an issue to stand in the way of taking action forward.

Yachts

73. Yachting interests were represented by a number of yachtsmen/women and organisations who work with them. The Chagos archipelago is used by long distance transiting yachts in the Indian Ocean as a stopping point in a long voyage or as a safe haven from adverse weather. The yachts anchor in designated areas in Salomon and Peros Banhos, and tend to fish by hand line, for personal consumption.

74. The Consultation Document does not comment on the implications of any of the options for yachts. All of the yachting interests who commented argued for continuation of current arrangements for them (in some cases with minor changes not directly related to designation of an MPA). They argued that, if they were not able to stop in Chagos, the next potential stopping point for them would be Reunion, which would significantly increase their continuous time on the open sea and so increase risks. (One observed that the Seychelles had been an alternative destination, but the risk of piracy has made that less attractive). They pointed out that their numbers were few; their anchoring points were agreed with an environment adviser (in 2007); and that their limited fishing for personal use did not cause material damage. In addition, they noted that they contribute through fees for anchoring (£100 per yacht per month) and could be a helpful 'eyes and ears' against illegal fishing.

75. One individual (with no obvious yachting connection) thought yachts should also be excluded from the area under an MPA, on the grounds of potential anchor damage to corals, and pollution caused by their waste. Independently, one of the yacht respondents said they could envisage restrictions on anchoring in shallower waters (up to 25m) with fewer restrictions in deeper waters, while another yachting interest queried whether the current anchoring areas were best placed, and suggested that some time restrictions on how long yachts might stay there might be introduced, to avoid any semi-permanent population developing. On waste, yachts

noted that they disposed of any waste responsibly.

Piracy

76. The danger of pirates in the Somali basin was raised by both yachting and fisheries interests. For both groups, with small or low vessels, or with a landing platform, the dangers associated with piracy affected the routes that they considered open to them. For yachts, one consequence was that more of them were taking a more southerly route across the Indian Ocean, avoiding known danger areas. For fisheries, one group said that they were being pushed further east in search of safer fishing. In some previous years licences for fishing in BIOT had not been taken up (because of cost and availability of other options) but this was likely to be less so now, because of the risk of piracy. In December/January, when purse seine tuna fisheries most often used the Chagos archipelago, there are few other areas where tuna could be fished in the Indian Ocean, and those areas brought greater risks.

77. Outside fishing and yachting interests relatively few respondents mentioned this issue. No-one questioned this account of increased risks, but one (environmental) organisation observed that piracy was a wider issue affecting more than just fishing interests, and had to be dealt with in any case; it should not influence decisions on the MPA.

Diego Garcia and the US base

78. The US maintains a military base on Diego Garcia. The Consultation Document suggests that it may be necessary to exclude Diego Garcia and its 3 mile territorial waters from an MPA, to ensure that it does not have any impact on the operational capability of the base.

79. Most supporters of an MPA as proposed (under any of the three options) did not comment on Diego Garcia, and the views of those who did comment were mixed. Wider comments about Diego Garcia were voiced by most members of the Chagossian community as well as a small number of other respondents.

80. Members of the Chagossian community said that it is unjust that the US base and those who work on it can inhabit Diego Garcia when they cannot. They observed, as do some others, that the presence of the base has caused pollution and environmental damage and that its exclusion undermines an MPA. Two issues raised particular concerns. First, fears about use of mid or low frequency sonar communication, which would be a danger to cetaceans; and second, concerns about nuclear submarines and possible contamination; they were concerned about the prospect of the USS Emory S. Land coming to the base as mother ship for nuclear powered submarines. They also referred to the Pelindaba Treaty, making Africa a nuclear free zone.

81. Other comments, as noted, were mixed. A representative of the US Navy commented that should any impacts be envisaged, they understood these would be fully presented and discussed utilizing historically established Exchange of Notes process between US and UK. A number of respondents took the view that Diego

Garcia should be excluded for operational reasons, provided that, at a minimum, current environmental standards are maintained. Others suggested that the base has had a positive effect on maintaining the environment, largely because it has kept other human impact (such as through tourism) low. One respondent suggested that Salomon and Peros Banhos should be excluded too, as that is where yachts anchor and their owners fish for personal consumption.

82. The opposing view tended to be based on wider views of the appropriateness of a US base on the island, regardless of its effect on the marine environment. However, a small number of respondents said insufficient information was available or provided about the environmental impact of the base, and suggested environmental impact assessments should be carried out. Amongst issues of concern were ocean noise pollution, dumping of waste and use of military sonar. Some doubted how far an MPA would in reality affect operational capability.

83. A number of respondents, whether for or against exclusion, highlighted some areas where they thought the US could play a useful part. They proposed a contribution to costs from the base, or in-kind support. This could involve assistance with policing the area, or providing other facilities for short term use.

Fishing – bycatch

84. By catch of non-targeted species by the tuna fisheries (both purse seine and long line), especially of vulnerable or endangered species such as sharks and rays which have a low capacity to replace numbers removed by fishing, was a major concern for the majority of supporters of option 1. Most respondents simply noted the issue as a concern without providing detail: where more detail was provided there are differences of view, especially between the fishing community and specialist marine protection organisations. In part this may reflect differences between long line and purse seine fishing, or between figures from the reef or the open ocean. However, whatever the level or circumstances, bycatch was one of the most frequently raised issues among respondents.

85. A number of bodies referred to high levels of bycatch in the BIOT waters. In one case it is reported that of 4084 fish caught on hooks, 48% were bycatch; more generally it is suggested that levels can be 25% or more of total catch. One ecological body observed that long line and purse seine bycatch of sharks in the BIOT EEZ is significant, with on average 1200 tonnes of sharks landed every year since 2002, and a figure of 100,000 non-targeted fish per year is quoted. They add that an underwater visual census of 4 island groups has shown a 90% decline in number of sharks present on coral reefs in the last 30 years; this has been caused by legal fishing by Mauritian fishers as well as by poaching by illegal fishers.

86. Fishing interests pointed to a different picture, noting (independently of each other) that their catch is dominated by large, mature tuna in free schools, and levels of by-catch are nearly non-existent; one estimated around 3% of total catch, including very few vulnerable species. They noted that catches are recorded in ships' logs. They also pointed to new legislation in BIOT from 2006 bringing further restrictions, and further noted that much of the taking of species other than tuna comes from illegal fishing, which will continue to be a problem in a no-take zone.

87. In response other groups noted that under-reporting in logbooks remains likely and may be substantial, and that catches reported in logbooks are considerably less than might be expected based on the catch rate of sharks and rays in preliminary survey of bycatch in BIOT waters. They observed that the low level of observer coverage means independent verification of catches, including bycatch, is patchy and poor, especially for the long line fishery.

88. It is acknowledged that shark species are migratory and are widely distributed, beyond BIOT waters, so an MPA would not offer full protection for any individual species. However, conservation groups and shark specialists pointed out that a no-take MPA is more likely than the current situation to lead to recovery.

Fish Stocks

89. Some similar arguments related to fish stocks. Over-fishing and depletion of the oceans' stocks, and the need to help them recover, was one of the main recurring themes raised by a large number of supporters of Option 1. Specific reference was made to decline in tuna stocks. There was a widely expressed view that no-take zones were needed to provide a refuge for fish stocks, to help them recover and thrive. A number of respondents argued that this would lead to increased stocks in areas outside the MPA, which would be of benefit to fishing interests elsewhere in the Indian Ocean, outside the no-take zone. Some preliminary findings were put forward by one respondent that an incidental effect of piracy off the Somali coast had been increased quality and quantity of migratory and resident species off the Kenya coast, which suggested a potential beneficial effect on neighbouring sea areas from a no-take zone.

90. One representative of fishing interests pointed out that the IOC's scientific committee had done work on how an MPA would benefit highly migratory species like tuna and had concluded that it would not, unless a very large area was under consideration, not necessarily in Chagos. While there had been some bumper years (such as 2007) Chagos was not a major tuna area, with a short season, although it was becoming more important because of piracy. It was also the case that, while there had been some problems with yellowfin stocks this year, it was not generally the case that tuna was overfished. There were projects underway in the Indian Ocean to consider best location and size of protected areas. They therefore considered it important that an MPA not be described as being to contribute to tuna protection, as it was not yet clear what the benefits and disbenefits were for tuna. In fact, closing off this area might have a displacement effect for fisheries – vessels may go to places where they were not able to catch the adults but more juvenile, smaller fish. It was in fishermen's interests to have healthy stocks.

91. This group thought that more could be done for tuna stocks by a series of management measures, such as quota allocations. It was pointed out that if the BIOT administration wished to reduce total tuna capture in the Indian Ocean, a possibility would be to take part in quota discussions, take a quota, and then not use it. This would reduce total take, rather than displacing it to another region outside the MPA.

Reputational Issues

92. Reputation and legacy questions were very frequently raised, by a high percentage of private individuals. Respondents wrote of the magnificent legacy an MPA would involve, the opportunity it provides to do something of great importance and value and the opportunity it offers for the UK to show leadership, act as a role model, and encourage others to follow. One person noted that this would keep the UK in the scientific frontline and that anything less would be disappointing, and would risk undermining the UK's commitment to the environment and protecting biodiversity. It was regularly said that it would be a great achievement to establish this MPA in 2010, the international year of biodiversity, and that it would be a worldwide precedent for others to follow. It would be a legacy to be proud of.

93. Reputational considerations were raised by opponents of the MPA too, though in much smaller numbers. One respondent, for example, urged consideration of the diplomatic implications of going ahead before the European Court of Human Rights has concluded, and without agreement of neighbouring states.

94. As one respondent observed, the listed benefits in the Consultation Document do not include political or reputational issues.

Other Conservation measures

95. The consultation sought views on what other measures for further protection of the environment respondents would suggest. There was a strong response to this question, with more than 10% of written respondents offering input. There is a high degree of consistency amongst the topics suggested, although they are not always considered in great detail.

96. The most frequently mentioned approach is that additional terrestrial measures should be taken to complement marine protection, on the grounds that these are interrelated. One respondent suggested creation of a long term plan for further conservation management of the atolls, another that a comprehensive Chagos archipelago reserve should be considered. This might include steps to increase the population of seabird species and assist the recovery of rare turtles (for example through removal of beach litter); eradication of rats (a frequently mentioned suggestion); steps to restore native vegetation and remove foreign organisms, reversing the damage done by plantations; and conserving the built environment. A number of respondents suggested that a local population could be employed as stewards and guardians to monitor this work. The possibility of international support (building on Ramsar and world heritage initiatives already in place) was raised.

97. A number of individual proposals were made by smaller numbers of people. One suggested that a small permanent research facility should be set up (contrary to the suggestion of the Consultation Document). Another highlighted the importance of providing future reports to the public, to enable them to see what benefits protection measures were having, and one suggested this might include a possible TV

documentary. One suggested that improved monitoring and research on pelagic species in deeper water should be explored, and another suggested restricting anchoring areas for yachts in shallower water.

98. Proposals were not confined to the BIOT, with a few respondents suggesting more should be done to create large scale marine reserves in UK and adjacent EU waters.

Annex 1: List of Contributors who commented on the Consultation Proposal

In addition to those listed below, who made comments on their choices, 227 people contributed a preferred option without comment, and 256,000 responded through one of a number of petitions.

Private Individuals, expressing a personal view

Martin Abrams	Jack Brodie	Kerry-Ann Duffy
Suzanne Adamson	Henry Brown	Hugh Dunkerley
Kevin Akin	Roger Brown	Anne Edward
Sophie Allebone-Webb	Rosemary Brown	Clive Efford MP
Charles Allen	Victoria Brownlee	Wendy Eifflaender
Dr Gary Allport	Fran Buckel	Anthony and Christine Elliot
Aycha al-Sheikh	Paul Buckley	Geoffrey Emmett
Atholl Anderson	Alison Bunn	Jeff Ennis MP
Dr Charles Anderson	Robert Burstow	David Evans
Anonymous	Adeline Cantais	TG Evans
Matt Argyle	Matthew Cassidy	Trevor Evans
Kenneth Armitage	Chris Cathrine	Adam Fetherstonhaugh
Phil Arnold	Vanessa Cheney	RH Finzel
Dinah Atkinson	Leo Chesterton	Linda Foley
Phil and Kay Atkinson	Bob Clarke	Baroness Fookes of
David Bailin	Toby Clarke	Plymouth DBE DL
Sheri Bankes	Dr Ted Hinton Clifton	Don Foster
Joe Barnes	Dr RL Coe	Sarah Foster
Sally Barnes	Dr Nik Cole	Jeremy Fraser
Graham Batin	Debbie Coleman	Mike Freeman
Daniel Bayley	Kate Cooper	Tom Fremantle
Richard Beales	Jeremy Corbin MP	DT Frost
Mikel Becerro	Adam Corlett	Sarah Gall
Richard L Bennett	Richard and Kathryn Cottier	Alistair Gammell OBE
Jennifer Bixby	Juliette Coudert	Barry Gardiner, MP
Giles Blunden	Peter Cox	Carol Garner
J Boardman	Mike Crew	Dr Andrew Gill
Lucy Boddam-Whetham	Javier Cuetos-Bueno	Commander L L Grey DSCRN
Councillor Philip Booth	Andy Daer	Eleanor Gloster
Charles Borman	Alison Dark	Simon Goddard
Peter Bottomley MP	Chris Davies	Margaret Godwin
Rafe Boulon	Carolyn Davis	Chris Goodenough
Peter Bouquet	Bryan Dawkins	Hester Gordon
Samuel Bouquet	Dr Dave Dawson	Ian Gordon
Dr WPP Bourne	Simon DeSmet	Hugh Govan
Heidi Bradner	Dr Fergus Dignan	Taffeta Gray
Heath Bradshaw	Richard E Dodge	Martin Grimshaw
Mary Branscombe	J L Dodworth	Jamie Guerrero
Ursula Braybrooke	Derek Donaldson	Jon Gulson
Natalia Bremner	Kenneth Donaldson and	Jenny Habib
EA Bridgstock	Cathy Dean	Jonathan Hall
Capt. GP Brocklebank RN	Paul Douch	Matthew Hanson
	John Doune	Douglas Hadler
	Mike Downey	Dr Annelise Hagan
	Peter Drummond	Harmony A Hancock

Peter Harris
Sir Thomas Harris
Dr Julie Hawkins
Nathalie Haymann
J Heasman
GJ and MV Heath
Paul Heaton
Pete Heine
Tracey Hemmerle
Iain Henderson
Richard Heron
Michael Hewitt
Dr Peter Higgs
FPG Hill Natasha Hill
Nick Hill
Edward Hind
Hugh Hobbs
Sidney J Holt
Nick Hook
Durand Hotham
Simon E Hughes
CR Hunneyball OBE
Clive Hurley
Alice Hutchings
Illegible
Richard (Ted) Ingram
Jon Irwin
Peter Jackson
Simon Jackson
Suzanna Jackson
Mike Jennings
Dr P Jollands
Claire Jones
Glynis Jones
Humphrey Jones
Jill Jones
Philip Jones
Rachel Jones
Stephanie Jones
Robert Jutsum
Michael Kavanagh
Thomas Kelly
Dr Jeremy Kemp
Emma Kennedy
Bridie Keyse
Judy Keyse
Ridlon Kiphart
Heinz Kluge and Patricia
Byland
Alan Knight
Mandy Jane Knott

Kevin Kohler
Lisa Labinjoh
Jeff Laitila
Evan Landy
Jeremy Lattin
JM Lawrence
Keith Lawrie
Clency Lebrasse
Professor Paul Leonard
Grace Leung
James Lewis
Marjorie J Lewis
Mary Lidgate
Wendy Lidgate
Louise Lieberknecht
Gary Littlejohn
Kate Lloyd
Gareth Long
Jose Lopez
Patrick Loughran
Jay Luciani
Eric Machinist
David Marsland
Howard Martin
Richard JR Martin
Samantha Jayne Mason
Dr Tony Matthews
Eemelda Mawamure
Jenny Maxwell
Jeremy Mead
Helen Marie Meatcher
Kerry Merchant
S. Mfsud
David Millard
Ben Moody
Christopher Morgan
Julian and Veronica Morse
Alison Mosson
Aimee Middlemiss
MJ Milligan CBE
JH Milner
David Moss
Joyce Murray
Carol Murtha
Caitlin McCormack
Valerie MacFarlane
John McGeehin
Ethan Machemer
Lord Mackay of Clashfern
Ross Maclean
David MacLennan

The Rt. Hon. Lord
Maclennan of Rogart
Carol Newing
Baroness Nicholson of
Winterbourne, MEP
Mike Ogden
Sarah Outen
Graeme Pagan
Richard Page
Jose Truda Palazzo
V Palombo
Alan J Partfitt
Gary Parker
Marit Parker
Douglas Parkes
Sally Peltier
Gabriele Peniche
Gerald Penny
Bob Perry
Marjorie Peters
Robert Philpott
Franz Pichler
Bernard Picton
Dr MW and AE Pienkowski
Steve Pocock
Edward Pollard
Jill Portsmouth
Richard Potez
Andrew Jonathan Price
Stephen Price
Daniel Pullan
Pupils of Sir Thomas Abney
School
Christine Randall
Dominic Rannie
Chris Redston
SA Renvoiza
Joseph Reynolds
Bernhard Riegl
John Rimington
Janet Robertson
Paul Rowen, MP
Gwilym Rowlands
Jayne Russell
Stephen Rutherford
Ahmed Saheed
Harald Sammer
Peter H Sand
Louise Savill
Ann Scott
Alec Dawson Shepherd

J Shergold
Jill Sherry
Mahmood S Shivji
Raphael Sibille
Chris Simm
Barry Shoemsmith
Rebecca Short
Karin Sinniger
Claudia Siva
Jon Slayer
Peter Smith
Stephen F Snell
Jen Spence
Hannah Spencer
Mark Stephens
Paul Stephens
Cherry Stevens
Clara Perez Stevens
Ian Stewart, MP
Wendy Strahm
Tim Sutton
Dr Fredrik Svennelid
Steve Swayne
Kate Tanner
Jennifer Tankard
Dr John Tarbit
Lord Tebbit CH
Dr Darren Tebbutt
Sarah Teversham
Hywel Thomas
Dr Anthony D Tindale
Barbara Tindall
David Todd
John Topp
Josephine Tucker
Sara Vernon
Richard Vann
Alex Vierod
Joana Mira Veiga
Carl Villanueva
S. Wainwright
Michael Ward
John Warren
Matthew Waterkeyn
Catherine Watts
Claudia Watts
David Watts
Philip Clarkson Webb
Sue Wells
Tony Wells
Nigel Wenban-Smith

D White
Celia and Vic Whittaker
Timothy Whitton
Colin Wilkinson
C.W Williams OBE
Gordon A Williams, BA
FRAeS, FIOD
Heather Williams
Jennifer Williams
Jackie Wilson
Sandy Wito
P Robert Wood
Rosemary Woods
Ben Wray

**Contributions from
Institutions or their senior
members**

Dept. of Natural History,
University of Aberdeen
ANABAC
Association of zoos and
aquariums
Australian Institute of
Marine Science
AZTI Marine and Food
Technology Research
Institute
Birdlife International
Blue Marine Foundation
Blue Ocean Institute
Blue Reef Aquarium,
Newquay
Blue Ventures Conservation
Environmental Biology,
University of Bradford
Bombay Natural History
Society
Fisheries Centre, University
of British Columbia
British Ecological Society
British and Irish Association
of Zoos and Aquariums
Buglife
Dept. of Geography,
University of Cambridge
Department of Zoology,
University of Cambridge
Chagos Conservation Trust

Chagos Environment
Network (CEN)
Chagos Island Community
Association
Chagos Refugees Group
Chagossian Social
Committee (Mauritius)
Chagos Social Committee
(Seychelles)
Conservation International
Coral Cay Conservation
CORDIO East Africa
Diego Garcian Society
European association of
zoos and aquaria
European Union of
Aquarium Curators
Falklands Conservation
Fauna and Flora
International
Five Oceans Environmental
Services, Muscat
Dept of Zoology, University
of Florida
Frankfurt Zoo
Global Ocean
Greenpeace UK
University of Guelph,
Canada
Harapan Rainforest
Hummingbird Scientific
Interatun Ltd (Seychelles)
International Fund for
Animal Welfare (IFAW)
International Society for
Reef Studies
International Union for
Conservation of Nature
(IUCN)
IUCN Shark Specialist Group
Japan Far Seas Purse Seine
Fishing Association
Joint Nature Conservation
Committee
Leipzig Zoo
Linnaean Society of London
Living Oceans Foundation
Division of Biology, Imperial
College, London
King's College London

Dept. of Geography, Royal Holloway, University of London
Marine Biological Association Plymouth
Rosenstiel School of Marine and Atmospheric Science, University of Miami
National Environment Research Council
Natural Resources Defense Council
Nova Southeastern University, Florida
Biology Dept., Dalhousie University, Halifax, Nova Scotia
OCEANA
Ocean Cruising Club
Oceanic Research Institute, Durban
OPAGAC
Coastal Zone and Marine Environment Studies, Pembrokeshire College
Pew Environment Group
Plymouth Marine Laboratory
Project AWARE Foundation (International)
RCC Pilotage Foundation

Marine Conservation Society
Marine Culture of Mascarene Ltd, Mauritius
MRAG
Reef Check Malaysia Bhd
RSPB
RYA
South African Association for Marine Biological Research
The Natural History Museum
The Shark Trust
UK Chagos Support Association
Ulster Wildlife Trust
School of Ocean Sciences, University of Wales, Bangor
Biological Sciences, University of Warwick
Whale and Dolphin Conservation Society
Wildlife and Countryside Link
University of the Witwatersrand, South Africa
World Society for the Protection of Animals, UK
WWF-UK

Marine Education Trust
Marwell Wildlife
Orthongel

WWT Arundel Wetland Centre
Environment Department, University of York
Marine Conservation, University of York
ZooAquarium of Madrid
Zoological Society of London

Meeting Participants

Chagos Community Association (Seychelles)
Chagos Refugees Group (Mauritius)
Diego Garcian Society (UK)
Indian Ocean Tuna Commission (Seychelles)
Nature Seychelles
Principal Secretary for Environment, Government of Seychelles
Seychelles Fishing Authority