



BRITISH PORTS ASSOCIATION

Rt Hon. Sir Robert Goodwill MP
EFRA Committee
House of Commons
London
SW1A 0AA

6 December 2022

Dear Sir Robert,

Sealife mortality off the north-east coast of England

The British Ports Association is the trade association representing UK ports. Our 100 port members own and operate over 400 ports, terminals and marine facilities and include 19 of the top 20 fishing ports by landings. We have followed the Committee's examination of the mass deaths of crustaceans off the north-east coast of England in 2021 and we have noted with interest the recent exchange of correspondence between the Committee and Defra. We support Government efforts to find the cause of this event.

We are concerned at some of the Committee's recommendations and the implications they could have for dredging in UK ports if they are followed through. You will be aware, as a former ports Minister, that UK ports generally have statutory duties to ensure the safety of navigation for vessels using the harbour and this usually involves maintenance dredging of channels and berths. Whilst ports generally have powers to dredge, a marine license is needed to dispose of dredged material at sea, which accounts for the overwhelming majority of disposal volumes. The UK has robust procedures in place to ensure dredged material will not cause environmental harm and the testing regime is aligned with strict international standards.

Dredging is critical to keeping the UK's ports open. Ports handle 95% of the UK's trade in goods, handling nearly 500 million tonnes of cargo every year including around half of our food and significant amounts of our energy. Ports also handle millions of passengers and support regional economies, coastal communities and the entire blue economy including the flourishing offshore wind industry. The wider maritime industry supports over 1 million jobs in the UK. UK ports are commercial entities and proposals that significantly increase the cost of dredging or otherwise make it unviable threaten the wider viability of investment in the sector. It is therefore important that changes to dredging framework are implemented using robust evidence.

We have become increasingly alarmed at some of the statements and recommendations being made based on what we believe to be unconvincing, erroneous or a lack of evidence about the impacts of dredging and disposal activity.



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As the committee has heard, maintenance dredging is a routine activity and has been undertaken by hundreds of UK ports for many decades. Having reviewed a copy of the research paper written by Dr Gary Caldwell that has been shared with us, experts we have spoken to have raised significant doubts around the conclusions, which do not appear to be supported by the results in the paper. For instance, to reach the concentrations of pyridine specified in the plume modelling in the paper, we estimate that this would require 5,000 disposal events in a single day, or approximately five years' worth of dredging disposal. There are also a number of basic mistakes throughout the paper we have seen which further undermine our confidence in it.

We expect that the new 'expert panel' being formed by Defra will confirm this, but we are disappointed that such far-reaching recommendations have been made on the basis of one study that has not been peer-reviewed or even published in a public forum. We do not believe that the claims made should be given a similar weight to the expert advice of regulators and the Government's own marine science experts at Cefas. Cefas are world leading experts in marine and freshwater science with a long record of providing data and advice to Government and are independent of either the fishing, ports or any other industry.

It is welcome that the Committee recognises the grave consequences of a moratorium of maintenance dredging for ports and associated industries, from logistics to fishing to offshore energy. Dredging is a significant expense and no port will undertake more than is necessary to ensure the safety of vessels using the harbour. We therefore very much welcome the Minister's response on a review of dredging practices given that, in our view, no credible evidence has been presented that dredging is connected to the mortality event.

Ahead of the appearance of the Secretary of State at your committee this week, we hope that any further recommendations or actions are pursued using robust and credible evidence. We would of course be delighted to share more detailed information on the importance of dredging to ports and the UK economy or our views on some of the claims made about its impacts.

Yours sincerely,

Mark Simmonds

Director of Policy & External Affairs

Cc: Secretary of State for Environment, Food & Rural Affairs
Parliamentary Under Secretary of Secretary of State, DfT