

Pembrokeshire Marine Special Area of Conservation
Relevant Authority Group
Progress Report 2018 to 2020



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Contents

1. Introduction.....	2
2. Projects.....	2
<i>Surveying the Waterway Environment for Pollution Threats (SWEPT) Volunteer Project (GRANT FUNDED PROJECT WORK)</i>	2
<i>Surveying the Welsh Environment for Pollution Threats (SWEPT) Additional/follow-up work (GRANT FUNDED PROJECT WORK)</i>	3
<i>Bilingual marine education pack (FUNDED PROJECT WORK)</i>	4
<i>Seagrass Ocean Rescue - Dale Seagrass Restoration (FUNDED PROJECT WORK)</i>	4
<i>Manx Shearwater work (FUNDED PROJECT WORK)</i>	5
3. Additional SAC Management Scheme implementation progress.....	5
Table 1: Main Relevant Authority Group Achievements 2018-20.....	6
4. Liaison.....	7
5. RAG Finances.....	8
6. Site feature condition.....	8
7. RAG Priorities.....	9
Table 2: Relevant Authority Group Priorities for 2021.....	9

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For more information on the SAC including management documentation, see
www.PembrokeshireMarineSAC.org.uk

1. Introduction.

The Relevant Authorities Group (RAG) for the Pembrokeshire Marine Special Area of Conservation (SAC) have been a multi-sectoral partnership dedicated to joint working to improve SAC feature condition since 1999. RAG members include Pembrokeshire County Council, Pembrokeshire Coast National Park Authority, the Port of Milford Haven, Natural Resources Wales, Dŵr Cymru Welsh Water and Trinity House Lighthouse Service.

A SAC Officer has been in post and funded using pooled resources from group members for 20 years; the longest running dedicated SAC Officer role in the UK. The group was proud to recognise this anniversary in January 2020. The agreed management scheme for the site was launched in August 2008. Work since then has focused as much as possible on management scheme implementation. Due to reduced core funding availability in recent years, including a lack of funding from Natural Resources Wales (NRW), work has necessarily become more project orientated as the RAG have needed to explore use of different funding grants to take forward active SAC management implementation.

This report summarises the period 01 Jan 2018 to 31 December 2020. The amalgamated three-year report is due in part to the major project SWEPT which began in 2018 and culminated with sharing events and follow-up in 2020, and also the SAC Officer's time availability to collate this report.

2. Projects.

Surveying the Waterway Environment for Pollution Threats (SWEPT) Volunteer Project (GRANT FUNDED PROJECT WORK).



SWEPT project staff were incredibly proud to accept the Park Protector Award 2019 at a ceremony at the Houses of Parliament in July 2019.

The SWEPT volunteer project was led by the SAC Officer and co-delivered with the West Wales Rivers Trust, Pembrokeshire Coastal Forum and the Darwin Centre. Funding for the project came from Natural Resources Wales (NRW). SWEPT saw over 100 volunteers conduct repeat surveys of stretches of the shore within the Milford Haven Waterway, from tidal limits at Haverfordwest and Canaston Bridge all the way down to Dale, and test water samples for levels of nitrates and phosphates between November 2018 and March 2019.

The primary objective of the water quality citizen science project was to gather data and look at the effects of nutrient pollution from land run-off on the marine environment. It proved to be hugely successful, both in terms of the involvement of volunteers and the acquisition of useful data. So much so, that it won a national award. The *Park Protector Award*, run by Campaign for National Parks, the charity for England and Wales' 13 National Parks, celebrates and supports projects that make a difference to protecting some of the most famous countryside in the world. SWEPT was the only project from Wales to be shortlisted and raised awareness of the important connection between what we do on the land and the state of our coastal waters.

The quality and amount of data generated far exceeded project expectations. During the four months of repeat surveying, 2105 photos and 881 nitrate and phosphate tests were taken by volunteers. Four canoe trips collected data from hard to reach areas. Results saw a myriad of different freshwater inputs from seeps and mini waterfalls to pipes and streams, 320 were described across the waterway during the period of heaviest rainfall in December. Mapped results showed nitrate levels to be very high in many locations. Phosphate was generally low throughout. No significant temporal difference in pollution levels was found

although higher rainfall was noted to accompany higher levels of pollution. Three university students aided data handling and analysis and two students utilised SWEPT data for their theses (both receiving a first). A small subset of samples was analysed both with SWEPT-utilised Kyoritsu PackTest colour change kits and via NRW laboratory routine statutory testing. When statistically analysed within the ranges of clean water, some evidence of pollution, and polluted, the data was found to be normally distributed. For those comparisons where there was not a match in result, the PackTest kit was seen to consistently record a lower concentration. The colour change field kits were therefore less accurate than laboratory test comparisons, but importantly they did identify pollution where it existed and were unlikely to provide false positives. In line with previous comparison studies, SWEPT concluded that PackTest kits are a quick, easy and cost-effective way for citizen scientists to identify nutrient pollution over large areas.

Marine features of the Pembrokeshire Marine SAC are in unfavourable condition due in part to nutrient pollution from agricultural run-off carrying fertilizers and sewage. The waterway has also failed to meet 'Good' status which is required for Water Framework Directive compliance by 2027. SWEPT data has supplemented NRW's statutory monitoring and has been used in NRW's investigation work to review the condition of the Milford Haven inner and outer catchments. Extra resource to conduct additional monitoring of the waterway by NRW was possible in 2020 due to its identification as an Opportunity Catchment (informed by SWEPT data); NRW staff hope to utilise PackTest kits for instant pollution level recording over the winter 2020. Ultimately it is hoped that SWEPT results will contribute to prioritisation of land conservation actions and lead to environmental improvements.

In addition to the water quality results, volunteers also collected information on marine litter, non-native species and any other pollution threats such as oil or fly tipping. All immediate pollution concerns logged during the fieldwork were followed up and resolved by NRW. 'Hot spots' of debris highlighted by survey volunteers on the shores of the upper waterway prompted a *Big River Clean-up*, led by the Pembrokeshire Coast National Park in the summer and autumn of 2019, where a considerable quantity of marine litter was removed and recycled. The issue of abandoned or derelict vessels, highlighted during surveys, was taken forward by NRW in 2020 through the capital project *Restoring and Naturalising the Milford Haven Waterway Intertidal Area* via an appraisal of options for removal and summarising the legalities involved.

SWEPT proved popular with participants and undoubtedly raised awareness of the issue of land run-off affecting the marine environment. Including local people in local environmental issues aids awareness and understanding of human impacts and this provides real impetus for environmental protection.

Prize money from the *Park Protector Award* was used to write a thorough report on the SWEPT volunteer project that, in addition to presenting the results, was also intended as a means of helping others replicate the methodology elsewhere. The SWEPT report is available on the SAC website. And to aid promulgation of the project's experience an event was held in 2020 to share information and lessons learnt. This was funded by a project grant from the Pembrokeshire Nature Partnership. Original plans for a face to face meeting in March 2020 had to be postponed due to Covid-19 and a SWEPT sharing event webinar, hosted by Pembrokeshire Coastal Forum, was held on 28th September 2020. This was recorded and can be found on YouTube <https://youtu.be/4Z-dDLIfD0I>. The SWEPT experience was also shared via a presentation for the online Wales Biodiversity Conference in November 2020. Interest in applying SWEPT methodology to other areas has been expressed.

Surveying the Welsh Environment for Pollution Threats (SWEPT) Additional/follow-up work (GRANT FUNDED PROJECT WORK).

Funding from the Pembrokeshire Nature Partnership was also used to purchase additional PackTest nitrate and phosphate tests for catchment work in north Pembrokeshire and for an open coast project to further raise awareness of the issue of nutrient run-off and its potential to impact coastal water quality. Pembrokeshire Coast National Park were partners for the open coast work and Park Rangers, the SAC Officer and a small

number of volunteers conducted water sample testing in October 2020. Additional project funding through the Pembrokeshire Coast National Park will enable the production of a short report to summarise results in early 2021.

Bilingual marine education pack (FUNDED PROJECT WORK).

Provision of a bilingual education resource has been an aspiration since the *Marine Awareness Roadshow for Schools* (MARS) SAC-led work in 2012-2015. Funding from Pembrokeshire County Council, Keep Wales Tidy and Pembrokeshire Nature Partnership have enabled the development of this seashore activities pack. The SAC Officer made contact early on with local educators and interested parties to ensure good collaboration and to target the resource appropriately. It was agreed that the pack would be mainly aimed at primary school education but be relevant for other organised groups to use (e.g. outdoor activity providers, Scouts/Girl guides, U3A). Liaison and collaboration also occurred with other Marine Protected Area Officers and searches for relevant content conducted.



Primary school teacher workshop to inform seashore activity pack development (March 2019).

A workshop with some teachers was held in March 2019 at which some draft content was considered and presentation of information and ideas for further inclusion, were discussed. The pack contains both shore-based and indoor activities as well as useful shore-based information to aid leaders and provide them with the confidence to undertake safe, productive and fun seashore trips. The resource will be provided in e-copy only and is designed so that users can print individual activities as required. With a little modification to remove local context, the pack can fulfil requirements by Keep Wales Tidy for a national marine education resource freely available for all. Liaison has also occurred with the Marine Conservation Society who are keen to promote and make use of Welsh-English resources.

Due to the pressures of other work, notably seagrass-related, completion of the resource was delayed. The bilingual seashore activity pack will be available in spring 2021 from the Pembrokeshire Outdoor Schools website and other relevant platforms including the Hwb used by schools across Wales. Some stand-alone content such as spotter guides and beach bingos were made available via social media in 2020 and have proved popular with schools and families.

Seagrass Ocean Rescue - Dale Seagrass Restoration (FUNDED PROJECT WORK).



Seagrass Ocean Rescue is a joint venture between Sky Ocean Rescue, WWF and Swansea University and funded the Dale project - the first proper seagrass restoration project in the UK. Assistance on stakeholder planning and engagement was commissioned from the Pembrokeshire Coastal Forum and the Pembrokeshire Marine SAC Officer. Intensive local community liaison began in April 2019 and continued throughout the year in order to seek to secure community support for a trial planting project. Stakeholder liaison also helped to support the official licensing process. By the end of 2019, the project had reached a consensus on a planting zone and was awaiting the outcome of the licensing process with NRW. In February 2020 the Marine Licence was granted and planting took place in the following weeks. The SAC Officer also input to a work package on visitor moorings for the area as a future management tool. By the end of 2020 many mature seagrass plants were growing, although the delayed planting over the winter of 2019 had likely reduced the viability of stored seeds and overall germination success was less than hoped-for. Further seed planting took place in autumn 2020 to complete the 2-hectare restoration trial. Aside from addressing the practicalities of planting, the restoration trial also prompted policy discussions regarding the status of restored seagrass and

culminated in an addendum to the SAC management scheme to satisfy and reassure concerns about future management from local interests.

Manx Shearwater work (FUNDED PROJECT WORK).

The RAG were approached by the Wildlife Trust of South and West Wales in 2019 to help liaise with shipping agents and industry in order to raise awareness of the issue of Manx shearwater fledgling groundings due to light pollution (particularly on tankers at anchorage in St Bride’s Bay).

Funded by Pembrokeshire Coast National Park Authority, the SAC Officer liaised with relevant stakeholders including island wardens and bird experts and produced an infographic and an information sheet available in English, Welsh and Filipino (Tagalog - for ship crew members) and distributed these appropriately, including on social media to raise greater awareness of the issue and contribute to discussions on the Dark Skies initiative.

Although not a feature of the SAC, Manx shearwater birds use the site and are features of the overlapping Skomer, Skokholm and the seas off Pembrokeshire Special Protection Area (SPA). The RAG was seen to be the ideal partnership for reaching stakeholders to address this management issue.



Some of the outputs from the shearwater light pollution work.

3. Additional SAC Management Scheme implementation progress.

Time to pro-actively pursue other management scheme actions was limited in 2018, 2019 and 2020 due to the amount of time spent on project work. However, the following were still maintained as much as possible:

- Partnership working to address management of living resources, in particular the bait digging voluntary code for the Gann and the pursuit of a byelaw to improve feature condition. NRW recruited a post to further explore the potential for additional management and have been liaising with the SAC Officer and building upon the work of the RAG.
- Marine recreation management, working with Pembrokeshire Coastal Forum to maintain the Pembrokeshire Marine Code and Outdoor Charter work. A training day on rocky shores, conservation and foraging was co-delivered to outdoor providers in May 2019. The SAC Officer also input to the Wales Activity Mapping project (led by Pembrokeshire Coastal Forum) which updated information and looked into sustainable recreation activity. As part of this work, conflicts between recreational activity and Marine Protected Areas (MPA) features were ‘heat mapped’ as a tool to help inform management. Addressing recreational carrying capacity has been an action within the SAC Management Scheme since 2008.
- Education and awareness raising. A presence on social media is maintained with a Facebook page @PembrokeshireMarineWildlife and a Twitter feed @PembbsMarineLife. The SAC Officer also handles *ad hoc* media enquiries and SAC-related queries from members of the public.

Table 1 presents a summary of some of the main achievements from the relevant authorities collectively (the RAG), for 2018 to 2020 alongside agreed top-level action objectives from the SAC management scheme. These do not represent the sum total of SAC related work, but are examples of work done, often in connection with priorities for the year. The RAG is keenly aware that relating achievements to specific SAC actions from the 2008 management scheme, a practice presented in previous progress reports, is no longer worthwhile as the management scheme needs significant updating although much of it remains extremely relevant. The RAG conducted a light touch review of the management scheme in 2016 and continue to

prioritise efforts according to feature condition reporting and local knowledge and expertise as well as available resources.

Table 1: Main Relevant Authority Group Achievements 2018-20

Actions achieved	SAC Management Action Objective
Secured financial contributions from RAG members and funding from varied sources sufficient to take forward the work of the RAG in delivering conservation improvements for the SAC.	<i>Secure the resources necessary to implement the SAC Management Scheme.</i>
Delivery of SWEPT project, gaining data on nitrate and phosphate levels and distribution within the Milford Haven waterway and raising awareness of the impacts of nutrient run-off on the SAC.	<i>To secure good quality relevant data on pollution sufficient to adequately inform SAC management.</i>
National liaison for, and development of, a bilingual marine education resource to raise awareness of the SAC and promote interest. Marine plastics awareness raising work including schools' materials and input to the Wales Clean Seas Partnership. Providing marine species training to outdoor activity providers. Regular use of Facebook and Twitter to raise profile of SAC work.	<i>Raise level of awareness of general stakeholders and the public to enable understanding of the SAC and its Management Scheme.</i>
Facilitating pioneering seagrass restoration in the SAC through local stakeholder engagement and policy discussions to enable the creation of a new 'bonus' seagrass bed.	<i>Raise level of awareness of all vessel users regarding the impact they might cause to the SAC features and what actions they can take to reduce impacts. (Restoration was not on the horizon when the Management Scheme was agreed in 2008).</i>
Working with NRW to input to the <i>Non-Licensable Activities Project</i> and specifically aiding review of information and future management options regarding the issue of bait digging at The Gann. Inputting to the <i>Wales Activity Mapping</i> project and working with Pembrokeshire Coastal Forum to support Marine Code work.	<i>Ensure recreation management infrastructure is fit for the purpose of safeguarding SAC features. Locally manage recreational activity to safeguard SAC features.</i>
Significant input to CCERA's MPA Inquiry follow-up in 2019 including giving evidence at the Senedd. The SAC Officer continued to input advice to the Welsh MPA Management Steering Group and multiple RAG members attended the Group and worked on an action plan to aid MPA improvement across Wales.	<i>Effective/comprehensive relevant and competent authority awareness and understanding of the SAC and its Management Scheme.</i>
Joint working with other MPA Officers in Wales to review national and local activity relating to disturbance to species from recreational activity and litter in the marine environment. Networking with MPA Officers across the UK to share information and benefit from lessons learnt elsewhere.	<i>Utilise and build upon existing resources which contribute to implementing the SAC Management Scheme.</i>

It should be noted that in addition to the pro-active collective work relating to Regulation 36 mentioned in this report, each authority also expends significant effort meeting Regulation 61 pertaining to management of "plans and projects". Authorities routinely deal with what are termed "plans and projects" (something that requires some sort of specific statutory consent, authorisation, licence or permission). When such plans and projects occur within or have the potential to affect the SAC, they need to undergo a Habitats Regulation Assessment. This is a formal step-wise process that should ensure that any effects to the SAC are considered, and that plans and projects only get the go ahead if they will not have an adverse effect on site integrity, and

will not result in deterioration of SAC habitats or significant disturbance of SAC species. Under certain specified conditions, plans and projects with adverse effects on site integrity can go ahead provided that those effects are compensated through other measures.

Plans and projects can have one of the biggest collective impacts on the SAC's features. It is for this reason that the RAG, within the partnership, routinely exchanges information on current plans and projects, and seeks ways to locally improve the consenting process and ultimately to minimise any effects on the SAC. Plans and projects are not addressed in detail within the site management scheme because they are dealt with individually by RAG members through Habitats Regulation Assessments. The response to plans and projects is necessarily reactive, whereas conversely the SAC management scheme is proactive, looking at what improvements need to be made to current management, and identifying the information needed to better inform future management.

Dealing with plans and projects, such as large developments with multiple consents associated with them, can be time-consuming both for the consenting authority and for the nature conservation advisors, Natural Resources Wales.

4. Liaison.

The RAG continues to work closely with many Pembrokeshire-based partnerships, organisations and individual stakeholders in order to update information and to encourage and facilitate working of relevance and benefit to management of the SAC.

On a wider level, marine protected area related work liaison continues to take place mainly via other Welsh Marine Protected Area (MPA) Officers, the Welsh MPA Management Steering Group chaired by Welsh Government, and the UK MPA network as well as with relevant academia.

- The RAG input significantly to the inquiry by the National Assembly's Climate Change, Environment & Rural Affairs Committee (CCERA) into the management of MPAs in Wales in 2017 and the SAC Officer was invited to give evidence at the Senedd in May 2019 for follow-up work by the Committee. The Committee published their follow-up report in November 2019 which included 15 recommendations and aligned with many of the points raised by the RAG. Despite the response by Welsh Government in January 2020, it is the RAG's hope that the recommendations can be progressed to benefit the management of, and ultimately improve the condition of, all MPAs across Wales.
- A long overdue meeting was held with some members of Welsh Government's Marine & Fisheries Division in July 2019 where an update of RAG work was presented. The RAG welcome involvement by Welsh Government in the SAC partnership but appreciate that it is not always possible.
- The SAC Officer input to joint projects on wildlife disturbance and litter with other MPA Officers in Wales, funded through the Welsh MPA Management Steering Group's action plan for 2019-2020 and 2020-2021.
- The SAC Officer attends regular catchups with MPA front line staff around the UK; the last face-to-face event was an MPA officer site management workshop in October 2018 in Skegness organised and supported by Natural England. A workshop was planned for 2020 in Scarborough supported by Natural England, but this had to be postponed. The network provides a valuable platform for sharing information and experience across the UK.
- Whilst individual RAG members sit upon various national task and finish or stakeholder groups and input according to their specific remits, they also consider the work of the RAG and feed back to the Group to benefit collaborative working. In addition, the SAC Officer engages whenever possible with NRW to enable site level experience to inform strategic working and the marine area statement.

It should be noted that whilst contributions to national work are seen to be essential and should also assist management long-term of the Pembrokeshire Marine SAC, this does reduce the ability to progress the RAG's site-based work programme.

5. RAG Finances.

RAG members Pembrokeshire County Council, Pembrokeshire Coast National Park Authority and the Port of Milford Haven all continue to successfully contribute financially to the Group to enable joint working to continue. The Port of Milford Haven's continual hosting of the SAC Officer, with significant in-kind support in terms of office and supporting services on behalf of the Group is gratefully acknowledged. Dŵr Cymru Welsh Water warned that 2019 may be the last year that their long-term annual contribution could be made. Valued RAG member Eve Reed left Dŵr Cymru Welsh Water at the end of 2019 and it is hoped that continued representation and involvement from the organisation will be able to continue in the future. NRW does not contribute to the core funding of the RAG but did fund the SWEPT project through its competitive grant. Towards the end of 2020 an arrangement was made to fund six days of the SAC Officer's time to input into joint working with NRW to progress project proposals to improve site condition.

Additional funding via project work secured through grant money helps to 'top-up' Group funds to allow the continuation of the SAC Officer part-time post. Having insufficient resource to properly address management scheme reviews, work programme prioritisation, beneficial liaison and even routine matters such as minutes of meetings, means that this core work consequently suffers. Updating the management scheme for the site and overhauling the SAC website are large tasks that are long overdue but require significant resource in order to progress.

6. Site feature condition.

Information on the third round of reporting (2013-2018) on SAC feature condition under Article 17, with national reports in April 2019 and then an EU assessment in September 2019, is available at https://ec.europa.eu/environment/nature/knowledge/rep_habitats/index_en.htm.

UK summaries are available at <https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summaries> and give a fairly unchanged picture compared to the second reporting round (2007-2012). Marginally more habitats are in favourable condition, but the same amount 71.26% remain unfavourable/bad.

UK summaries for the habitat features give sandbanks, estuaries, mud/sand flats and reefs as all unfavourable (bad) with the assessment trend being 'unknown'. Atlantic salt meadows are also unfavourable (bad) but with the assessment trend being 'deteriorating'. Lagoons, caves and shallow inlets/bays are unfavourable (inadequate) with a 'stable' assessment trend.

Regarding reporting on site feature condition at a site level, NRW made an indicative site level feature condition assessment for the Pembrokeshire Marine SAC available in January 2018¹.

This document indicated that Pembrokeshire Marine SAC features were unchanged or in some cases worse than reported for the second reporting round. Of the 15 features for the site, none of the 8 habitat features were in favourable condition. All were listed as unfavourable except for sea caves whose condition was unknown due to a lack of information (the last survey of sea caves occurred in 2002). Of the 7 species features for the site, 5 were favourable with sea and river lamprey being unfavourable. **The fact that two thirds of features for the site are in unfavourable condition is a sobering one, as is the fact that this information is now outdated and based on information collected prior to 2018.**

NRW are currently working on an EMFF funded project *Improving Marine-Site Level Condition Reporting Assessment in Wales*. The project aims to develop indicators, and a process for reporting, on the condition of designated features within Wales' network of MPAs. This work is now feeding into the development of feature indicators. It is hoped that pilot assessments to test the indicators will occur by the end 2021. Having up to date site level feature condition information will enable site managers to confidently target management actions towards specific areas identified as being able to contribute towards maintaining or

¹ NRW, 2018. Pembrokeshire Marine / Sir Benfro Forol Special Area of Conservation: Indicative site level feature condition assessments 2018. NRW Evidence Report Series, Report No: 233, 67pp, NRW, Bangor.

improving feature condition/status. Meanwhile RAG members have a good understanding of the main issues for the site which largely remain unchanged and through liaison with site based NRW staff are able, with adequate resources, to tackle areas in need of improvement.

The issue of how SAC condition is reported and how even management failures can be addressed at the highest-level once Wales and the UK leave the European Union is yet to be clearly established. It is likely that a new independent commissioner for Wales will be set up to police breaches of environmental law, although there could be a long delay before the new system is up and running.

7. RAG Priorities.

Any review of work done is not complete without some forward planning. The RAG is continuously evaluating SAC issues, and priorities may change. Current joint RAG priorities are summarised in Table 2. These are linked to high level action objectives within the SAC management scheme.

Table 2: Relevant Authority Group Priorities for 2021

Priority Action	SAC Management Action Objective
Complete the bilingual seashore activity pack and launch in spring 2021. Continue to use all available platforms to widely promote education and awareness raising about SAC features and management.	<i>Raise level of awareness of general stakeholders and the public to enable understanding of the SAC and its Management Scheme.</i>
Support additional management measures to reduce nutrient inputs to the SAC. Continue to share experience from the SWEPT project to aid water quality evidence gathering elsewhere and to further increase awareness of the impacts of nutrient run-off on the marine environment.	<i>Manage agricultural run-off to safeguard SAC features.</i>
Continue to raise awareness of recreational codes of conduct within the SAC including the bait digging code at The Gann and voluntary sensitive habitat zones within the waterway. Maximise opportunities for feature improvements.	<i>Raise level of awareness of recreational users and all vessel users of the site regarding the impact they might cause to SAC features and what actions they can take to reduce impacts. Locally manage recreational activity (and commercial bait digging) to safeguard SAC features.</i>
Work towards ensuring that all current and future recreational activity within the SAC is carried out at sustainable levels (address effectiveness of codes and recreational carrying capacity).	<i>Ensure recreation management infrastructure is fit for the purpose of safeguarding SAC features.</i>
Continue to pursue resources to take forward the work of the RAG in delivering conservation improvements for the SAC.	<i>Secure the resources necessary to implement the SAC Management Scheme.</i>
Work with NRW to jointly identify and, where possible, seek to progress projects to improve site feature condition.	<i>Effective/comprehensive knowledge of the effects of human activity in and upon the SAC.</i>
Work to ensure that RAG knowledge and experience can be used to benefit MPA management in Wales. Continue to contribute to the Welsh MPA Management Steering Group and seek to progress the recommendations of CCERA's MPA inquiry.	<i>Effective/comprehensive relevant and competent authority awareness and understanding of the SAC and its Management Scheme.</i>
Liaise with others as appropriate across Wales and the UK and use collective knowledge to benefit management of the SAC.	<i>Utilise and build upon existing resources which contribute to implementing the SAC Management Scheme.</i>