

Edinburgh University – EclA Guidelines Comments

We think it should be noted that it is hard to make specific points about these guidelines because they are very unspecific themselves. Although they list many issues that should be considered when, for example, determining the value of a site, the outcome is entirely site-dependent, so one set of guidelines for all sites is necessarily going to be vague.

Ambiguity needs to be reduced in the use of some terms with rather vague meaning (e.g. 'reasonable success', 'enhanced ecological outcome', 'temporary loss of ecological value', etc.).

There needs to be a definition of when EclA should be used, what it is and its relationship with EIA.

Para. 1.1 We question if EclA really is 'scientifically defensible'. Many aspects not at all objective, but highly dependent on subjective opinion. This paragraph needs to acknowledge the subjectivity of the method. Also, this is not about ecosystem management but about ecosystem assessment.

Box 1: The words in the title 'and ecological/biodiversity' seem out of context.

Para 1.14 Given the comment above, we suggest replacing the word 'objective' with 'balanced'.

Chapter 2 (screening and scoping);

A more step-by-step ordering of the main comments for scoping would make it easier to follow - like the summary of the stages in box 3. It would help if paragraphs 2.14-2.42 referred back to the steps in Box 3 to show the structure more clearly.

The section on screening is quite vague - examples of the kind of activities for which an assessment is required would help, including specific examples of Annex I and II activities that require EIA or EclA. The document should include a summary of the legislation as an appendix with a statement of the legal requirements.

Throughout the chapter the terms 'zone of influence', 'effect area', 'area of impact', 'effect zone' and 'impact zone' seem to be used interchangeably, which leaves you confused as to whether they mean the same thing or not.

Para 2.30. Box 5 does not give examples of possible effects. Line 8: 'that' should read 'than'.

Chapter 3 'Determining Value' section.

Positive points are:

- Takes many ecological factors into consideration (such as scale, site designation, species, habitats, economic and social).
- Mentions consultation with locals - use of local knowledge.
- Use of comparison to increase accuracy, e.g. comparing sites at a common geographical scale.

Negative points are:

- The determination of value is necessarily very subjective. Depending on the ecologist that does the assessment, certain areas will be given more value than others, maybe due to personal bias. This is mentioned, e.g. in 3.3 and 3.7, but needs more emphasis and recognition throughout. Subjectivity could be reduced by getting more than one ecologist, representing a range of expertise and including local knowledge, to assess the ecological value of the site (though increasing cost).
- There is no quantitative analysis. How do you decide that one thing (e.g. habitat or species) is more important than another? This section needs an additional paragraph on mechanisms to compare, for example, natural heritage value, ecological role and people's opinions of different features in order to reach an overall conclusion on value. Could, for example, more emphasis be placed on the use of economic value for assessment?
- Paragraph 3.7 notes the difficulty of extending the system to non-designated sites and more details should be given on how this should be done.
- A summary of the legislation on protected features would be useful to provide the legal background (perhaps in an Appendix).
- Include a new reference to temporal changes in value – e.g. over-wintering sites for wildfowl that might be overlooked in summer. (This is covered in Section 2 but needs reiterating here.)

Section 4, Impact Assessment.

Para 4.2 Reference should be to Chapter 3, not Chapter 4.

Under the 'Duration' section (4.10 - 4.11) it mentions both the duration of the activity and the impact. It should be made clear that both should be assessed as these sections merely mention that both exist and not that both should be considered in a report.

4.12-13 – what is a 'reasonable time scale'?

Under the 'Timing and frequency' section (4.14 - 4.15) it should be addressed that the frequency/occurrence of an activity is not static and does change and ensure that ecologists consider this if it is important/relevant. There may also be natural changes in the system that are unrelated to the impact – these should be considered here and elsewhere in this section.

Under the 'Cumulative effects' section 4.20 should be clarified as the difference between cumulative and 'in-combination' effects was confusing.

Under the 'Approaches for determining significant impacts' section (4.23 - 4.33) we felt that there were no concrete, listed approaches. These should be more clearly outlined and defined as the 10 sub-sections seemed superficial in content. Although a transparent approach is encouraged, it is not stated HOW the value of any feature should be used to determine implications. The method that is suggested instead of the 'high/medium/low' matrix is unclear and more guidance needs to be given as to how it should be used. Sub-section 4.31 was confusing and wordy and should be clarified.

There needs to be a section on how to quantify the effect of the impact and how this affects the value of ecological characteristics. The Dartford warbler example is valuable but only represents one type of impact on one type of resource (and one which is relatively easy to quantify). It would be valuable to have a range of different examples here including those where judgements are more difficult to make.

Para 4.32 needs to elaborate on how willingness of the proponent to enter into arrangements will influence the assessment.

Another improvement would be to include a section on the funding/financial aspects, and the man power/labour and other resources that would be required to carry out a successful impact assessment.

Overall the chapter was clear and useful, with examples being beneficial. However, it did seem slightly repetitive.

Chapter 5

This section needs to take into account natural ecosystem processes, for example natural change.

It would be more helpful if the chapter defined and recommended on a larger range of ecological variables.

Chapter 6

This is a useful chapter, good and clear.

Table 2 has only used one example per level and it would help if a wider range of examples could be included, perhaps several at each level.

Glossary

The glossary needs to be re-worked. The current glossary is extremely poor; it defines some terms that are well known standard English ('flora', 'fauna') but leaves out many critical terms that are used throughout the document (e.g. 'EIA', 'EclA', 'screening', 'scoping', 'zone of impact', 'value', 'in-combination effects', 'reasonable success', 'integrity of a site', etc.).

A glossary of acronyms would also be useful.

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