

# Wadden Sea Board

WSB 12  
20-21 May 2013  
Groningen



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**Agenda Item:** 6  
**Subject:** Alien species management and action plan  
**Document No.** WSB 12/6/5  
**Date:** 8 May 2014  
**Submitted by:** CWSS

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Attached is a document by the CWSS providing information and a brief evaluation of the reasons for the rejection of the LIFE project proposal WIASAP (Wadden Sea Invasive Alien Species Action Plan), as well as proposals for next steps to be taken in order to fulfill §35 of the Tønder Declaration.

## Proposal

The meeting is invited to discuss the document and to adopt the proposals contained in it

## TRILATERAL ALIEN SPECIES MANAGEMENT AND ACTION PLAN

### Background

On 25 June 2013 the trilateral project application WIASAP (Wadden Sea Invasive Alien Species Action Plan) was submitted to the LIFE+ programme by a consortium consisting of ministries/authorities from the Wadden Sea countries/Länder and Wadden Sea research institutes. The development of the proposal has been coordinated and facilitated by the Dutch Ministry of Economic Affairs.

The main purpose of the project was to develop a trilateral alien species management and action plan, within the framework of the trilateral alien species strategy, elaborated by the Working Group Alien Species (WG-AS), under the auspices of the Task Group Management (TG-M). The strategy was not adopted by MC2014 but in §35 of the Tønder Declaration it was agreed to further develop the strategy including an alien species management and action plan.

On 24 April 2014 the Ministry EZ was informed that the application has not been awarded.

### Objective

The objective of this document is to provide a summary and a brief analysis of the main reasons why the proposal was rejected, as well as proposals for implementing §35 of the Tønder Declaration.

### Evaluation LIFE+

The main scoring categories of the EU evaluation document (**Annex 1**), concern the technical and financial coherence and quality of the project, the contribution to the general LIFE+ objectives and the European added value. For all these categories the scoring is below the minimum level.

The main EU critique on the technical coherence and quality can be summarised as insufficient clarity (detail, quantification) of the contents of the various activities, as well as how the results of the activities can/will be applied in practice. A very specific comment is that the date of the adoption of the management and action plan is missing.

With regard to the financial coherence and quality it is concluded that the value for money is very low. This is caused by the combination of unclear results (see above) and high costs for several activities.

The contribution to the general LIFE+ objectives is considered insufficient because “the beneficiaries fail to demonstrate the application of numerous research-oriented actions to practice.”

For the category “European added value and complementarity and optimal use of EU funding” in particular the unclear nature and role of stakeholders is criticised.

### Conclusions

From the side of the CWSS it is concluded that the LIFE+ evaluators have judged the proposal on the basis of classical, mainly terrestrial oriented conservation practices. Here, generally, project activities and practical applicability of project results can be described with high level of detail. This is generally not the case for marine activities and certainly not for the very new and complicated field of invasive species and their impacts.

Although several activities could be described in more detail, this is certainly not the case for their precise application in practice. The testing of several innovative methodologies for their use in policy and management was in fact the core of the project.

The overall conclusion is that improving and resubmitting the proposal will very probably not lead to success because, as argued above, the applicability of various research activities will

first have to be tested and evaluated and cannot yet be described and specified in more detail.

## **Proposals**

It is proposed

1. not to resubmit the project under the LIFE+ Programme for reasons given above and that the coordinating beneficiary (Dutch Ministry EZ) informs the project partners accordingly
2. to set up a trilateral project with the aim of elaborating an alien species management and action plan, in accordance with §35 of the Tønder Declaration, making maximum use of the contents of the LIFE proposal, the consortium network and the financial means originally reserved for the LIFE project.

## **Annex 1**

### **EU evaluation WIASAP application**



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL ENVIRONMENT  
Directorate E – Global & Regional Challenges, LIFE  
**ENV.E.3 - LIFE Nature**  
Head of Unit

Brussels, 24.04.2014  
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**Subject: Proposal LIFE13 BIO/NL/000441**  
**"Wadden sea Invasive Alien Species Action Plan"**

On 7 April 2014, the LIFE Committee adopted an opinion on the list of projects on which the Commission will base its final decision concerning the financing of LIFE+ 2013 projects.

I regret to inform you that whilst your application passed all eligibility and selection criteria, it was excluded from the further evaluation by the insufficient score that it received for at least one of the award criteria n° 1 - 4. Please find attached the evaluation of your proposal.

I thank you for your interest in LIFE and look forward to an application from you in a future selection round.

Yours sincerely,

Angelo SALSI

Annex: Award Phase evaluation for your LIFE+ 2013 application

## **Annex**

Proposal number: LIFE13 BIO/NL/000441

Title: Wadden sea Invasive Alien Species Action Plan

### **1. Technical coherence and quality**

Minimum pass score: 8

Score received: 6

#### **Positive Comments:**

The preoperational context provides information on the main problems related to marine IAS in the Wadden Sea, and main causes of introduction, establishment and spread: ship ballast water, ship hull fouling (both from commercial and recreational ships), aquaculture as shellfish transport and secondary spread from the areas of introduction. The foreseen actions are coherent with this biodiversity problem. It will be sought that the Trilateral Management Action Plan on IAS for early warning and rapid response, developed by the project, be adopted by the Common Wadden Sea Secretariat Governmental Conference before the end of the project. But see important negatives.

The proposal is submitted by the Ministry of Economic Affairs of the Netherlands, the competent authority for Nature and Biodiversity in the Netherlands, with other 15 beneficiaries, 2 of them private commercial (a shipyard company and a research-consultancy firm). The public beneficiaries are public bodies or national agencies and research centres or universities. The nature, competences and tasks of all the beneficiaries are related to the project objectives and actions. It must be noted the presence, within the project consortium, of the Common Secretariat for the Cooperation on the Protection of the Wadden Sea, (CWSS) a transnational body established for the trilateral cooperation of the protection and conservation of the Wadden Sea.

The project management (Action F.1), will be under the control of the coordinating beneficiary, the Dutch Ministry of Economic Affairs, with a full-time project manager, supported by a project director together with a manager and a financial administrator. The management staff will be supported by three consultation bodies: 1) the Project and Innovation Board, composed by 5 representatives from the marine expert institutes (the marine expert group), and 5 representatives from the authorities; 2) the Marine Expert Group composed by representatives from the various marine institutes that are involved in the project and 3) the International Steering Group, composed by members from the Working Group on Alien Species (WGAS).

#### **Negative Comments:**

The previous situation is too poorly explained, with little information on the project area in terms of surface, targeted sites, ecological characterization, and magnitudes of the identified threats per country. Given that the project has not envisaged any preparatory action, form B2 should have provided quantitative data about IAS introduction and its impact on the native species.

Core activities mainly consist of lab research and analyses, supported by some field investigations, to set up an early warning system to prevent and fight IAS within the Wadden Sea marine environment. However, these actions include a series of sub-activities, not clearly explained in their methodologies and means to be applied; the expected results in terms of establishment of the early warning system are unclear.

Actions are not well enough explained, lacking relevant data, without quantified results. Action C.1 is vaguely described. It is not clear in what consists the “early detection monitoring”. Methodology and means are not described. It is unclear for instance if the action will be carried out only on the base of bibliographic knowledge or on the base of marine investigation.

In Action C.2, a selected number of target alien species will be barcoded, arguably for the first time. However, it is not explained how these will be selected, how many they are and what will be the selection method and protocol. Sampling methodology and distribution are too poorly described (12 sites in North-Western Europe) to assess the potential success of the action. The action is very unclear.

Action C.3 includes a long series of preliminary studies, data collection, analyses, that are just described in their aim, not in methodology and details. It will analyse invasiveness of species elsewhere, marine traffic to understand potential origins of invasion, model potential spread on the base of tides, winds, species ecological characteristics, etc., based on available sources but no field work is needed. Thus, it is very unclear why such a large budget is foreseen.

In Action C.4, the Jade-Wesere-Port is mentioned together with the problem of hull fouling but it is unclear what kind of activity will be carried out. The whole action is very unclear in its aims, methods and expected results; Action C.5 is very unclear, too, in its methods and lacks concrete results.

In Action C.6, 1,000 laboratory samples from treated ballast waters will be cultured to identify the remaining life forms. The expected output of the action is unclear. There are only two lines at the end of the description report that tests will be made with stakeholders on the operational use of Ballast Water Treatment Barge. Very unclear and not reported in more detail in other parts of the proposal.

Action C.7 will evaluate different anti-fouling materials in a selection of (not identified) harbours in Germany and Netherlands. Extracts from marine invertebrates will incorporate in phytogel and paint formulations to assess inhibiting micro and macro fouling. The rationale of this action is not explained and no reference is made on the current anti fouling best practices. The same action will test a method to eliminate fouling from floating docks, killing it with a plastic cover for some weeks.

In Action E.1, the date of adoption of the Trilateral Management Action Plan on IAS is missing.

In regard with the timetable, almost all the foreseen activities have been planned for the entire project duration.

Finally, project management is confusingly described. Not all the beneficiaries are involved, while there are some organizations taking part in the management structures even though they are not project beneficiaries. It is affirmed that a full-time project manager will be appointed, but form F1 includes only 774 person-days, which is scarce,

for a 54 months project. Project management staff appears overloaded and the cost of form F1 is expensive.

## **2. Financial coherence and quality**

Minimum pass score: 8

Score received: 6

### **Positive Comments:**

Requested co-financing rate is consistent with the LIFE+ rule: 50% is the maximum allowed to Biodiversity proposals. The 16 beneficiaries contribute adequately to the project budget. Producentenorganisatie van de Nederlandse Mosselcultuur, contributes € 31,073 as co-financer.

Financial commitments (forms A3 and A4) are properly filled, signed, confirmed and coherent with the information provided with the financial forms (form FC).

The +2% rule has been respected: the sum of public bodies contribution exceeds by more than 2% the total cost of the permanent public staff.

External Assistance costs are far below the 35% maximum rate. Public tendering rules are respected.

### **Negative Comments:**

The budget allocated to monitor the impact of project actions is very low (1% of total eligible budget), which is not reasonable for a project with so many conservation actions. Monitoring the impact of conservation actions (Action D.1) does not foresee travel and subsistence costs, and the sum it earmarks to personnel costs (adding a total of 166 person-days) is quite low for a 54-month project. All these indicate a poor project monitoring approach (see AW4).

Website costs seem overvalued and costs charged under different financial forms seem duplicated, e.g. cost for “development and application of website, database, ICT tools” under form F1 - Personnel; “designing and building a website, incl. translation costs” under form F3 - External assistance; and “website ICT development, software, website, and database” under form F4b - Equipment.

The costs for the Ballast water treatment barge is allocated under equipment costs twice: to Action C.6 (Assessment of port site ballast water treatment efficiency) and also to Action E.2 (Raise stakeholder and public awareness), without appropriate justification in the latter case.

Total personnel cost (form F1) is very high and not clearly justified by the cost calculation in the description of the action. In particular, very high daily rate costs and a very high number of working days (almost all actions are planned for the entire project



duration) have been charged to the project. Personnel staff involved are mainly university researchers, whose roles and tasks are not sufficiently explained in the project context.

Total travel cost (form F2) is very high and includes mainly costs for meetings, conferences, international steering meetings (within and outside the European Union), symposiums and participatory process. Only a small investment on field samples has been considered.

Total external assistance cost (form F3) is within the 35% threshold. It includes, however, mainly consultancy costs (to be added to personnel cost) and costs for renting laboratory facilities and laboratory space which are not justified (it is unclear why the universities involved cannot provide the needed lab space).

Total equipment cost (form F4b) includes costs for lab equipment not sufficiently justified.

Total consumables cost (form F6) includes mixed costs for travelling (meetings and excursions), workshop organisation, laboratory analyses (to be allocated in external assistance) and consumable materials for laboratory and analyses, not sufficiently described and quantified.

Total other costs (form F7) includes mainly costs for conference fees and cost for scuba divers (to be allocated under external assistance).

High overheads cost are charged.

The project budget is not sufficiently structured, with unclear, overloaded and unjustified costs in almost all budget categories. Considering the uncertain expected results and conservation benefit in terms of establishing an early warning monitoring system and its replicability (see AW1, AW3), the value for money is very low.

### **3. Contribution to the general objectives of LIFE+**

Minimum pass score: 12

Score received: 11

Positive Comments:

The main scope of the proposal is to reduce/mitigate the effect of Invasive Alien Species (IAS), in order to reduce the loss of biodiversity and protect the natural habitats within the Wadden Sea.

The project addresses the problem of IAS, and proposes implementation measures to guarantee a good environmental status of marine regions. These are themes of European relevance, for which the EU welcomes proposals in 2013.

The proposal takes into account the EU Biodiversity Strategy 2020, in particular the point 3.4 – Combating Invasive Alien Species, and the related Target 5: “By 2020, Invasive Alien Species and their pathways are identified and prioritized, priority species are controlled or eradicated, and pathways are managed to prevent the introduction and

establishment of new IAS". Besides, it will help to implement the Water Framework Directive and it might also contribute to the design and implementation of the current "Proposal for a regulation of the European Parliament and of the Council on the prevention and management of the introduction and spread of invasive alien species" (COM [2013] 620 final), now under discussion, which includes a chapter about early detection.

The proposal targets marine regions in view of guaranteeing a Good Environmental Status, as defined in the Marine Strategy Framework Directive (MSFD) (related to Descriptor 2, Non-indigenous species). The competent authority, the Ministry of Economic Affairs, responsible for Nature and Biodiversity Policy in the Netherlands, submits the proposal.

The proposal consists of a series of laboratory and field investigations and analyses (including DNA characterisation) to create an updated and complete framework of knowledge on the occurrence of invasive alien species within pilot areas of the Wadden Sea in the Netherlands, Germany and Denmark, to be applied in order to design, introduce, assess and demonstrate the best techniques and strategies to prevent and mitigate IAS impact on the marine environment.

According to the applicant, the proposal would foresee setting up an innovative, internationally coordinated action program, the Trilateral IAS Management and Action Plan for the Wadden Sea (MAP), which includes: a) pathway-oriented early warning system including early detection of priority species and b) mitigation by vector-oriented risk management.

#### Negative Comments:

The proposal is strongly research-oriented, with a very limited expected result in terms of identification of methods and means to restrain the potential arrival of marine invasive alien species. It will establish a barcoding databank to identify a number (not specified) of potential alien species and carry out a large number of research activities on ecology, chemical relationship between species, potential invasiveness based on ecological traits of species, effectiveness of current ballast water treatments and shellfish freshwater flushing treatment.

However, from none of these activities a concrete output in terms of alternatives in the management of ballast waters, shellfish import or management of harbours and ships fouling will be provided. The only action that foresees testing of anti-fouling materials is Action C.7, which is, however, very poorly described. The anti-fouling paintings are the subject of continuous research and production of new materials, and the approach undertaken by the applicant, is not explained in its reasons and in the context of what is currently being done to contain the fouling problem, a very widespread one.

Therefore, the project is strongly biased towards research, without providing potential applicative results. The preparation of a plan for the Wadden Sea, foreseen by Action E.1 can hardly be understood in the project context. It will include eradication and control measures for IAS that are not discussed in the proposal. Even the early detection and early warning activities foreseen by the Plan cannot be understood.

The project will not establish an early warning system but will only evaluate current practices and establish a method (through barcoding) to identify potentially invasive species. How the method will be implemented, by whom, where, with which methodology, requested expertise, funding etc. are not discussed at all in the proposal.

In short, the beneficiaries fail to demonstrate the application of the numerous research-oriented actions to practice. The expected conservation benefit of the proposal is therefore very vague.

#### **4. European added value and complementarity and optimal use of the EU funding**

Minimum pass score: 15

Score received: 13

Positive Comments:

The project will contribute to the techniques and methodology of monitoring biodiversity and the factors that influence it.

The proposal has an innovation character, as it tackles the problem and implements the actions for the whole Wadden Sea with a transnational approach involving three countries; this transnational methodology aims at setting up a management action plan (the Trilateral IAS Management and Action Plan for the Wadden Sea), which has never been done before. It has also a demonstration character, as the technique to treat ballast water going beyond the IMO principles is something new or unfamiliar in this socioeconomic context.

Relevant stakeholders from Germany and The Netherlands are also on board bringing their support: nature NGOs, seaport authorities, related research entities and the Wadden Sea Forum, a transnational organization representing Germany, The Netherlands and Denmark. The project consortium has two beneficiaries from the business sector (a shipbuilding company and a marine research consultancy) and also a project co-financer (the “Producentenorganisatie van de Nederlandse Mosselcultuur”, a mussel producers’ organisation).

The proposal includes enough measures for the communication and dissemination of the project actions and results to the general public by means of a set of flyers, film, smartphone app, an information centre on the water treatment barge with on-site port dissemination activities, teaching material for primary schools and training of university students. The monitoring the socio-economic impact of the project is correct.

## Negative Comments:

Mandatory communication products are missing: the Layman's report and the After LIFE+ Communication Plan.

Action D.1 actually aims at monitoring the results of the single action and not the efficacy of the early warning monitoring system. No specific methodology and means to assess the overall effectiveness of the entire model have been discussed or developed. No information on the potential replicability of the model in other context is provided.

In Action D.2, the description of monitoring the impact of the conservation actions is not properly developed, which is an important lack for a BIO project with demonstration/innovation character. The action description is, in general, a repetition of each one of the conservation actions rather than the description of the monitoring methodology to be implemented. There is no monitoring protocol, indicators, or sources of verification foreseen.

In Action E.2, the awareness of key stakeholders is not considered well enough. The description of the involvement or consultation of stakeholders (transnational, national, regional authorities, NGO & nature reserve managers, fishermen in aquaculture sector, port authorities, marina & harbour managers and ship owners) is weak and it is unclear how they will be actively involved. Only general dissemination initiatives and usual communication/awareness materials for general public are foreseen, while the methodology developed within the project is not promoted. Action E.2 includes depreciated cost for the ballast water treatment barge, but it is not clear how the stakeholders will be involved in the correlated experimentation of Action C.6.

In Actions E.1 and E.2, the organization of regional stakeholder's conferences, technical workshops, excursions and demonstrations of the MAP with stakeholders in the three countries represented in the project are mentioned, but without providing details about the contents of these activities, and information about where, with whom, how, and when they will be implemented.

Action E.4, concerning best practice transfer, has been described in a few lines, without proper description of methodologies and means.

In spite of its transnational nature, the proposal does not identify relevant stakeholders of the three states represented in the project: national authorities and regional institutions, marina and harbour managers, ship-owners, fishermen organizations or related sectors from Germany and Denmark, and there are no Danish NGOs identified. Besides, local entities, research centres and academic institutions, as well as tourism operators, should also have been identified.

Networking is weak. The description of the action is limited to explain that lessons learnt and results will be disseminated through the project website, publications, presentations in international conferences and invitation to stakeholders from other European sites of interest to the project events. But important information is missing, such as the identification of such international conferences and stakeholders from other EU countries. Also the identification of other EU projects with the aim of networking should have been foreseen.

Although the proposal indicates that this project cannot be funded by other EU financial instruments such as ERDF, ESF, EAFRD, CIP, and 7FP, for the latter a detailed

explanation on why the actions could not be funded by this instrument (or Horizon 2020) is missing, when the project has a high number of research actions.

Given the importance for a BIO project –and still more for and Invasive Alien Species project– of assessing the effectiveness and feasibility of the actions, the dissemination activities to share the project results and lessons learned, and the involvement of stakeholders for the success of the actions, the project is not sufficiently well designed to achieve these objectives.

## **5. Transnational character**

Minimum pass score: N/A

Score received: 4

Positive Comments:

The proposal shows a transnational character. The project consortium is composed by 16 beneficiaries from three countries: Netherlands (7), Germany (8) and Denmark (1); one of them is a transnational entity (the “Common Secretariat for the Cooperation on the protection of the Wadden Sea”). All the beneficiaries are directly involved in the actions’ implementation. Being the project area, the Wadden Sea, of international relevance, the transnational cooperation is essential to guarantee the achievement of project objectives.

Negative Comments:

N/A

## **6. Compliance with national annual priorities proposed by the Member State(s) and national added value according to the comments made by the LIFE+ national authority**

Minimum pass score: N/A

Score received: 2

Positive Comments:

No comment was provided by the National Competent Authority. However, the Ministry of Economy affair, which submitted the proposal, is the competent authority responsible for the conservation for Nature and Biodiversity Policy in the Netherlands.

Negative Comments:

No National Annual Priorities and no comments were provided by the Netherlands National Competent Authority.