

# Making Room for the DOGGER BANK

Towards a Biodiverse Democracy



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## Foreword

### THE DOGGER BANK AS A NURSERY SUMMARY

In the coming years, the Doggerland Foundation and the Embassy of the North Sea will collaborate with an extensive network of European partners, ecologists, policy-makers, legal experts, and designers to improve the representation of the North Sea's interests. Our focus is on the Dogger Bank, an underwater sandbank at the heart of the North Sea. Covering an area of over 25,000 km<sup>2</sup>, the Dogger Bank forms the core of a network of marine protected areas essential for restoring the North Sea ecosystem.



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The Dogger Bank is a unique area with a high diversity of habitats and species – a vital nursery for sharks, rays, herring, and cod, as well as a year-round rich feeding ground for whales and seabirds. It is also a cradle of stories about the past, present, and future of our relationship with the sea. This submerged land once connected the United Kingdom to Europe until the end of the Ice Age, when Neanderthals hunted woolly rhinoceroses, mammoths, and reindeer there. With the onset of the Holocene, around 7,000 years ago, the inhabitants of the Dogger Bank faced significant changes to the climate that caused rising sea levels, eventually submerging the area beneath the waves. The many archaeological finds – collected by fishermen, beach-combers, and researchers – connect us not only to our distant ancestors on the Dogger Bank but also place our own challenges with climate change, rising sea levels, coastal erosion, and reclaimed and lost land into an evolutionary perspective.

Divided into British, Dutch, German, and Danish territory, the Dogger Bank is a stage for numerous international political and economic interests, including shipping, fishing, and energy. However, through the Dogger Bank Coalition, we envision different futures for this area: the regeneration and abundant flourishing of the underwater eco-system. With a programme focused on passive and active ecosystem restoration and improved representation of the North Sea in the legal, public, and political domains, we aim to bring that future closer in the coming years.

On paper, the Dogger Bank may appear well-protected, but in reality, this marine area is still regarded as an industrial resource, with ecological ambitions falling far short. The Dogger Bank serves as a symbol of our relationship with the sea: we not only use it, we exhaust it. At the same time, we attempt to create a parallel reality on paper, suggesting that the sea is being protected. Scientific reports, policy documents, laws and regulations, new ambitions, and objectives continue to pile up, but effective protective measures are virtually nonexistent.

After years of discussions, only five percent of the Dutch North Sea is protected from bottom trawling, while other harmful activities – such as intensive shipping, the discharge of hazardous substances, sand, shell, and gravel extraction, the construction of wind farms, oil and gas drilling, the installation of a and pipelines, military exercises, and the detonation of explosives – continue virtually unabated across the North Sea. Research shows that the alternative reality of control on paper, scientific studies, and ever more North Sea policies have led to no improvements for marine life. The only certainty we have now is that the North Sea will continue to deteriorate if we keep creating more policies while taking little action.

Why did we begin to accept that the North Sea could be used as an industrial zone? The North Sea is a living entity, with all the

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characteristics of a person or a family member – an entity deserving a better place at the negotiating table. But to actually view the sea in this way? Unfortunately, we're not there yet. The North Sea is an overburdened body of water.

Dutch society – particularly politicians, policymakers, and the private sector – neglects critical scientific knowledge and the precautionary principle. Instead, we recklessly rush forward, driven by an almost religious belief in technological feasibility. Fundamental choices, improvements, and negotiations between ourselves and our environment are repeatedly deferred.

What are the challenges that need to be overcome? How can the Embassy of the North Sea and the Doggerland Foundation position themselves in relation to these issues? Drawing on years of collaborative work in the North Sea, we share in this manifesto our vision for the relationship with the North Sea and the Dogger Bank, providing context for the multi-year programme we are developing with a broad coalition of European partners. Together with ecologists, researchers, legal experts, citizens, policymakers, landscape architects, and artists from the Netherlands, the United Kingdom, Denmark, and Germany, we are working on future visions, legal actions, large-scale reef restoration in a 'School of Dogger Bank'. All of this serves the purpose of creating a thriving and resilient underwater world on the Dogger Bank – a nursery for the North Sea.

With the Dogger Bank Coalition, we are focused on improving the legal, cultural, and political representation of the Dogger Bank. We aim to explain why legal action is necessary to safeguard the minimum standards of conservation, provide concrete steps to democratise the conversation about the sea, and outline a path towards Rewilding, the restoration of reefs, tranquility, and space on the Dogger Bank.

If we succeed in giving one of the world's busiest seas the time, tranquility, and space it needs to recover – and actively support its restoration where necessary – the Dogger Bank can once again become a strong, beating heart of the North Sea and a global source of inspiration for boundless collaboration and large-scale ecosystem restoration.

EMBASSY OF THE NORTH SEA  
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The **Doggerland Foundation** is dedicated to the protection and restoration of the North Sea ecosystem. By pursuing legal action against governments and sectors that fail to comply with laws and regulations, Doggerland combats harmful activities at sea. The foundation raises the ambitions for marine conservation through area-focused interventions, including active restoration, and contributes to improved representation and rights for 'nature' in decision-making regarding the North Sea.

The **Embassy of the North Sea**, founded in 2018, asserts that the sea and all the life that it encapsulates belongs to itself and therefore deserves better political, cultural, and legal representation. The Embassy advocates for this representation by listening to and speaking for the many voices of the sea. At the Embassy, humans and nonhumans come together during studies and political discussions. From this collective effort emerge interventions, designs, artworks, stories, communities, statements, debates, publications, and actions. These enable us to perceive the North Sea as a political entity in cultural, political, and legal contexts.

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The North Sea is a living entity, with all the characteristics of a person or a family member – an entity deserving a better place at the negotiating table.

- The Dogger Bank is the heart of the North Sea, a unique area with a high diversity of habitats and species, serving as an important nursery and a highly nutrient-rich area year-round.
- Despite decades of North Sea policies and measures, almost none of the good intentions outlined on paper have been realised. Scientific reports, policy documents, legislation, new ambitions, and objectives continue to accumulate, but effective protective measures are scarce at best.
- This failure harms marine life, as well as our own bodies of water. We are also the sea. If the sea suffers, so will we. A healthy sea acts as a climate buffer, and a healthy sea provides healthy food.

### **Safeguarding the Minimum Standards**

- We call on the Dutch government and society to adhere to their own laws and regulations in fulfilling their duty to protect and restore the North Sea. For many years, the government has been failing to meet even these minimum legal standards.

### **Passive & Active Restoration**

- We call on all organisations committed to the North Sea to unite in advocating for a far more ambitious level of protection and restoration for marine life. The ambition of the North Sea Agreement falls far below the minimum standards agreed upon internationally and within the EU. In practice, the current approach to the North Sea does not even come close to achieving this already low level of ambition.
- Vulnerable habitats, species, and ecological processes must be fully protected from human interference. Therefore, we advocate for a network of marine protected areas that will ultimately cover at least 30–50 percent of the North Sea, with a minimum of 30 percent protected by 2030.
- In addition to passive protection and restoration, it is essential to actively reintroduce species, habitats, and ecological processes that have been so severely degraded that the ecosystem can no longer recover them on its own.
- Scientific reference areas will be of great importance in the North Sea. The Dogger Bank has the potential to generate knowledge about the restoration of degraded ecosystems, as well as to provide a deeper understanding of the vast complexity of the North Sea ecosystem and the influence of human activities on it.

### **Worldview**

- The Dogger Bank does not exist in the imagination of most Dutch people, and you can neither care for, nor form an opinion about something you cannot envision. We aim to bring the Dogger Bank to life in people's imaginations. To achieve this,

we need myths, images and stories, encompassing historical events and contemporary storytelling.

- We seek to understand the dichotomy between 'nature' and culture, human and non-human in Europe's scientific, political, colonial, religious, and cultural history.
- We no longer view the North Sea as 'nature' but as a living entity with intrinsic value and a right to representation in critical decisions concerning the North Sea. We are exploring legal personhood for the North Sea and the Dogger Bank: a dynamic entity with characteristics that can be attributed to a (legal) person.
- We must also acknowledge that shifting baselines severely limit our ambition for ecosystem restoration. Each successive generation inherits an increasingly diminished idea of what restoration entails.

### **Democratising the North Sea Dialogue**

- The political and policy processes surrounding the North Sea are extremely technocratic. We aim to democratise the conversation about the North Sea and involve civil society in the decisions and challenges at hand.
- To think beyond the confines of technocracy, we must first study and expose the rules and stylistic methods employed by technocrats.
- Currently, technocracy dominates: technocratically managed consultative bodies produce technocratic policy and management plans, such as the management plans for the protected marine areas of the Dogger Bank, Frisian Front, and Cleaver Bank.
- In these plans, the sea and marine life are poorly and one-dimensionally represented. The same applies to the North Sea Agreement, research programmes from the Delta Commission, the Sea Level Rise Knowledge Programme, research programmes on offshore wind farms, and so on. These are technical documents filled with maps, tables, and jargon, in which the North Sea is parceled out and divided as if it were a vast industrial zone.
- Special interest groups, companies, and governments collaboratively shape North Sea policy through consensus-building. Unfortunately, environmental organisations all too often participate in this technocratic process.
- It is crucial to amplify a diverse range of voices and create space for many more perspectives and worldviews. To that end, we advocate for a more critical examination of dominant implicit worldviews and values, as these form the foundation of laws, political rituals, and practices that have contributed to the current ecological crisis.
- We enable the participation of diverse stakeholders, human and non-human, by providing a broad and inclusive platform.



Current laws and policies cannot stop the loss of biodiversity or the poisoning of soils, lands, waters and air, because they are grounded in the fiction of the natural world as property or 'resources' for human desires. The privatisation, commodification and legalized enslavement of Nature as human corporate property, the phantom economy based on speculation rather than actual production and the financialisation of Nature, further expedite the destruction of ecosystems and lives.

Seed of Siena Declaration <sup>1</sup>

### Technocratic Tunnel Vision

Politics concerning the North Sea is deeply technocratic. Special interest groups, companies, and governments negotiate North Sea policy into existence. This approach is reflected in documents such as management plans and the North Sea Agreement<sup>2</sup> – technical documents filled with maps, tables, and jargon. Unfortunately, environmental organisations also frequently participate in this technocratic process, sometimes unwillingly.

The danger of technocracy lies in its lack of democracy. Issues are treated as problems to be managed, becoming the domain of a small group of experts rather than a broader (North Sea) community. Problems are often oversimplified to an extreme degree, and technocratic tunnel vision blinds us to the multitude of other contributing factors. Meanwhile, the voices of minorities, future generations, and ecological systems are left unheard or insufficiently represented.

### Independent Critical Position

The North Sea Agreement and its associated projects suffer from a lack of independence, ecological ambition, and public accountability. The ecosystem has been compromised through decades of consensus-driven stakeholder sessions, repeatedly producing new visions for the future. This approach results in delays. For example, the North Sea Agreement states that restoration will not begin until 2040. This means postponement in the here and now, even though the North Sea was supposed to have achieved a 'good environmental status' by 2020. Instead, the condition of the North Sea continues to deteriorate. Over the past decades, independent research institutes and organisations critical of societal structures have increasingly allowed their independent positions and roles to be co-opted through partnerships. A clear example of this blending of responsibilities and reputations is the partnership that Biodiversity Center Naturalis

has entered into with Noordzeker, an initiative by pension fund ABP, pension investor APG, and wind farm developer SSE Renewables. 'We see in Noordzeker a partnership that takes biodiversity seriously. We look forward to working together on the IJmuiden Ver wind farm', stated the deputy director in a press release<sup>3</sup>. It is indefensible for a largely publicly funded and critically independent research and public institute to participate in a commercial tender process on vague grounds.

There are significant risks associated with the current decision-making. It is unclear on which scientific facts decisions are being based. It is unjustifiable to the public who represents ecosystems here, with which mandate, and on what basis the decision was made to declare 85 percent of the North Sea bird-free while only protecting 15 percent in the North Sea Agreement. It is not transparent which assumptions are being accepted, such as the damage we are willing to tolerate. An independent position is necessary to critically assess monitoring, results, and the way interests are weighed. Above all, these considerations must be part of a political and public conversation.

### Climate Justice

Amid the flood of alarming climate reports, offshore wind turbines are presented as a key part of the solution. It is understandable that many people are pinning their hopes on such largescale technological solutions. However, there are fundamental problems with the way wind farms are being developed. The installation of these wind farms is already having a massive effect on the seacatching both human and non-human stakeholders – and this impact will only grow in the coming decades. The Netherlands is planning to build an area in the North Sea as large as three Dutch provinces. These plans are altering sea currents, stratification, sedimentation, and other natural processes. Wind farms will completely transform the marine landscape, yet there is limited knowledge about their ecological consequences, even though initial studies already reveal significant reasons for concern.

What is further overlooked is that a wind farm must also be just for the people and environments involved in extracting the necessary raw materials. Shockingly, this issue is entirely absent from the Dutch government's Programme of Requirements. The word 'grondstoffen' (raw materials) does not appear in the policy documents. The government doesn't address the mines in Chile, China, Congo, Indonesia, and South Africa. This follows a colonial logic and infrastructure that keeps extractivism and the exploitation of people and the environment out of sight. As a result, we risk repeating the mistakes of the past, perpetuating the deeper causes of the ecological and humanitarian crisis – such as overconsumption and exploitation – while keeping them hidden.

In policy documents concerning offshore wind farms, the word 'yield' takes centre stage. We advocate for a broader focus – not just on yields in euros and kilowatt-hours, but on defining ambitious yield obligations or goals for all parties involved. These should aim to protect and compensate those whose voices are barely heard, if at all, such as marine life and the people extracting the raw materials for Europe's 'green' transformation.

### More Democracy, More Civility

In a time of fragmented communities and declining trust in institutions, it is absolutely essential for civil society to organise itself and not be sidelined by technocracy and entrenched sectional interests. A constructive and dynamic civil society can renew and strengthen existing institutions. What is needed is more democracy, more debate, dissent, and stand taking. The Embassy of the North Sea and the Doggerland Foundation are committed to democratising the conversation about the North Sea, fostering a movement toward greater dialogue, critical debate, and diverse perspectives:

- To think beyond the confines of technocracy, we must first study and expose the rules and stylistic methods of technocrats as a specific genre.
- It is essential to amplify a rich spectrum of voices and create space for a much wider range of perspectives and worldviews within technocratically formulated programmes, such as the Sea Level Rise Knowledge Programme and studies directed by the Delta Commission, the North Sea Agreement, management plans, and so on.
- We also advocate for much more frequent critical examination of dominant implicit worldviews and values, as these form the foundation of the laws, political rituals, and practices that have contributed to this ecological crisis.
- We enable the participation of diverse stakeholders by offering a broad and inclusive platform.

1. Global Alliance for Rights of Nature, The Seed of Siena, 2023. Accessible online at: [www.garn.org/seed-of-siena-declaration/](http://www.garn.org/seed-of-siena-declaration/)
2. [www.noordzeeloket.nl/en/@238924/north-sea-agreement/](http://www.noordzeeloket.nl/en/@238924/north-sea-agreement/)
3. [www.noordzeker.nl/index1085.html?c=1&guid=nz-31&lang=en](http://www.noordzeker.nl/index1085.html?c=1&guid=nz-31&lang=en)

## 2. Imagining: AN ECOLOGICAL POLITICS FOR THE NORTH SEA

### A Seat at the Table

'Nature' and culture are inseparably intertwined, and as humans, we depend on the other 99.999 percent of life for our survival. However, plants, animals, objects, and microbes have no direct voice in our current political system, leaving their interests insufficiently represented<sup>4</sup>. As we argued during a Moot Court at the Peace Palace, The Hague<sup>5</sup>, protection often exists only in a paper reality. This must – and can – change, which is why the North Sea is asserting itself as a political entity.

### The Dogger Bank Introduces Itself

Ask a random person on the street if they know anything about the Dogger Bank, and the answer is likely to be no. The Dogger Bank does not exist in the imagination of most Dutch people, and you can neither care for nor form an opinion about something you cannot envision. Everyone knows the Drielandenpunt (Three-Country Point) near Vaals. Yet, the Netherlands also has a 'Four-Country Point', or more precisely, a four-country area. In this border area of the Netherlands, Germany, Denmark, and the United Kingdom, there is no observation tower or ice cream cart. Instead, it lies in the middle of the North Sea: the Dogger Bank. We aim to bring the Dogger Bank to life in people's imaginations. To do so, we need myths, images, and stories encompassing historical events and ancient myths to contemporary stories and conflicts.

The North Sea, the Dogger Bank, and marine life belong to themselves and therefore deserve better political, cultural, and legal representation on their own behalf. This principle challenges the foundational assumptions underlying many existing practices, laws, and political rituals. We seek to understand the dichotomy between 'nature' and culture, human and non-human in Europe's scientific, political, colonial, religious, and cultural history. In doing so, it opens the door to a different worldview – which is precisely the goal. It is also a difficult endeavour, as we are imagining a reality that does not yet exist, much like democracy and the rule of law once did not exist.

### School of Dogger Bank

In our programme, we no longer view the North Sea as 'nature' but as a living being with intrinsic value and a personality. We are exploring the possibilities of legal personhood: a dynamic entity with characteristics that can be attributed to a (legal) person. We practice diplomacy by listening to the countless voices within the North Sea and amplifying them in public debate. These voices can be perceived and understood through our senses and through artistic, scientific, and experiential research, which generate insights, perspectives, and stories. This act of listening is a fundamental prerequisite for taking

responsibility in our relationship with the sea. In the coming years, humans and non-humans will continue to meet in the 'School of Dogger Bank' through research and political discussions. From this collective effort will emerge ideas, designs, artworks, stories, networks, statements, discussions, interventions, and actions. These will enable us to recognise the North Sea and the Dogger Bank as political entities in cultural, political, and legal terms.

### European Dialogue

The conversation about the Dogger Bank is, of course, also a European one. The Netherlands has made commitments in various ways – with other countries, the European Union, and its own citizens – to take proper care of the North Sea and everything connected to it. This includes plants, fish, birds, marine mammals, and other species, as well as the interactions School of Dogger Bank between the air, water, seabed, and all the elements that make the North Sea a living system.

In doing so, the Netherlands also takes care of its inhabitants, who are equally dependent on the sea. These commitments are enshrined in international treaties, as well as European and national laws and regulations, ensuring they cannot easily be swept aside by the political whims of today or tomorrow.

### Shifting Perspectives: Confluence of European Water Bodies

Beyond treaties and agreements on protection and restoration, the dialogue about our relationship with the North Sea and the worldviews connected to it is equally important. The Embassy of the North Sea is a co-initiator of the Confluence of European Water Bodies, a European collaboration between representatives of more than 25 water bodies across Europe. This initiative, launched in 2023, stems from a collective effort to better understand the 'Rights of Nature' in Europe. As a growing community, the Confluence of European Water Bodies fosters new dialogues and relationships with water. In this testing ground for water diplomacy, new strategies for the effective representation of water in Europe's cultural, legal, and political domains are explored, practiced, and advocated. This work leads to actions, artistic and scientific research, and political and public campaigns.

4. "Natura 2000 and the Dutch National Ecological Network (NNN) have proven unable to halt biodiversity loss. This calls for a systems approach that accounts for the necessary space and dynamics of natural processes. This approach and the resulting structure should guide nature development in the 21st century." – College van Rijksadviseurs (College of Government Advisors).
5. [www.embassyofthenorthsea.com/projecten/renewal-in-law-the-north-sea-speaks/](http://www.embassyofthenorthsea.com/projecten/renewal-in-law-the-north-sea-speaks/)

It is high time we acknowledge that with the scientific knowledge available to us, we only understand part of the world. Why not instead respect the fact that there is still so much we do not know? What is not (yet) known should be factored in as a safety buffer or margin. In other words, when adhering to the legal protection obligations for the North Sea, the precautionary principle must finally be taken seriously.

### The Precautionary Principle

There is sufficient knowledge to understand that continuing to allow the current forms and intensity of activities in and around 'nature' reserves makes it impossible to achieve the conservation and restoration goals. Under the precautionary principle, it must be excluded 'to a near-scientific certainty' that these activities obstruct the attainment of a favourable condition in protected areas. This level of understanding regarding the harmfulness of such activities has already been reached in many cases. However, this does not mean that the harmful effects have been sufficiently studied. In nearly all cases, further research will reveal that these activities are even more damaging than currently assumed. A key reason for this underestimation is the lack of investigation into cumulative effects. With better examination of how the impacts of different activities amplify one another, it would become clear that the damage is far more extensive than what most current studies suggest.

Under the European and Dutch legal framework, the burden of proof lies with those who wish to initiate an activity to demonstrate that it is not harmful. This responsibility should not be shifted onto environmental organisations, which are often among the few – if not the only – advocates for the genuine protection of the North Sea ecosystem. These organisations are frequently forced to commission extraordinarily expensive ecological studies to prove what is already widely understood: reserves are intended to provide the underwater world with peace, space, and time to recover. Harmful activities – by definition, those that obstruct protection and restoration – do not align with these purposes at their current levels of intensity.

### Acknowledging the Existence of Shifting Baselines

It is important to recognise that shifting baselines severely limit ambitions for restoration. Each successive generation inherits an increasingly diminished understanding of our living environment and what is required to improve it. Even conservation goals are based on ecosystems that are already heavily degraded, rather than aiming to enable ecosystems to recover to its full potential. It may be hard to imagine what a healthy North Sea looks like or what it needs to regenerate. However, it is obvious the North Sea will improve if we give the underwater world the space, time, and tranquility to recover.



Where necessary, the Dogger Bank coalition must support this process through active restoration, enabling the return of species and habitats that cannot recover on their own. For example, we will actively restore shellfish reefs on the Dogger Bank and (re)introduce key species such as the common skate. By monitoring the effects of both passive and active restoration, we will finally gain an understanding of the North Sea's resilience when given the opportunity to heal itself. We will do what is urgently needed: restoring natural ecosystems to address the biodiversity crisis and to rebuild climate buffers. The excuse that we lack sufficient knowledge to turn paper promises into genuine restoration efforts is no longer acceptable.

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This act of listening is a fundamental prerequisite for taking responsibility in our relationship with the sea.

We call on the government to finally uphold the legally established agreements for the protection of the North Sea ecosystem. If the government fails to fulfil its obligations, we will hold it accountable in court. The Netherlands must immediately implement protective measures to give the North Sea a chance to recover. What went wrong, for example, with the marine areas granted protected Natura 2000 status, and with the management plans that were supposed to ensure the effective protection of these reserves, such as the Dogger Bank, Cleaver Bank, Frisian Front, North Sea Coastal Zone, Vlake van de Raan, and Voordelta?

- The effects of permitted activities have not been seriously assessed for their impact on protected species and habitats.
- The management plans lack measures to regulate human activities in a way that limits damage sufficiently to allow the ecosystem to recover and achieve conservation objectives.

Globally, it has been agreed to protect at least 30 percent of seas and oceans, as the state of marine ecosystems is deeply concerning. The North Sea is no exception, being in very poor condition. A network of marine protected areas covering at least 30 percent of the sea is crucial for its recovery. These protected areas must be of such high quality that they also provide a boost to the rest of the (less protected) North Sea. The concept behind such a network of protected areas is that the whole achieves greater conservation and restoration benefits than the sum of its parts. However, in the Dutch North Sea, these protected areas largely exist only on paper: in reality, the ecosystem is barely protected in these zones. In fact, the condition of these protected areas has remained poor and continues to deteriorate further.

#### **A Quarter of the Netherlands**

When a Natura 2000 area is designated, protective measures must be outlined in a management plan. Such a plan regulates human activities within the area to ensure they do not undermine the agreed conservation or restoration of protected species and habitats. In 2016, the designation decisions for the protected marine areas Frisian Front (2,880 km<sup>2</sup>), Cleaver Bank (1,539 km<sup>2</sup>), and Dogger Bank (4,735 km<sup>2</sup>) were finalised. Together, these areas account for over 15 percent of the Dutch North Sea – half of the minimum protection required. For comparison, this represents a surface area larger than a quarter of the Netherlands. Following this, the government had three years to draft the management plans. However, these plans were only finalised in October 2023, four years late.

The top 10 issues we believe should take centre stage are:

- The goals outlined in the plans are not ambitious enough because they are based on the 'new normal', where the ecosystem was already severely weakened (shifting baseline syndrome).
- Impact assessments are conducted using incorrect data.
- The cumulative effects of stacked negative impacts are not evaluated.
- Effects are not assessed independently or with adequate scientific substantiation.
- Problems are downplayed, and certain effects are simply not assessed.
- The precautionary principle is not applied, allowing activities that may harm the ecosystem to continue despite uncertainty.
- Activities that disturb and/or destroy protected species and habitats are permitted.
- Proposed measures are ineffective.
- The importance of protected marine areas for marine mammals and other sea life is
- The government prioritises protecting industrial sectors with the greatest impact.

This is also why the Doggerland Foundation is pursuing several legal actions to ensure that the government complies with its own conservation laws. These cases aim to compel the Dutch government to take concrete measures to protect the designated marine protected areas.

## 5. Ecology: REWILDING, REEF RESTORATION, TRANQUILLITY, & SPACE

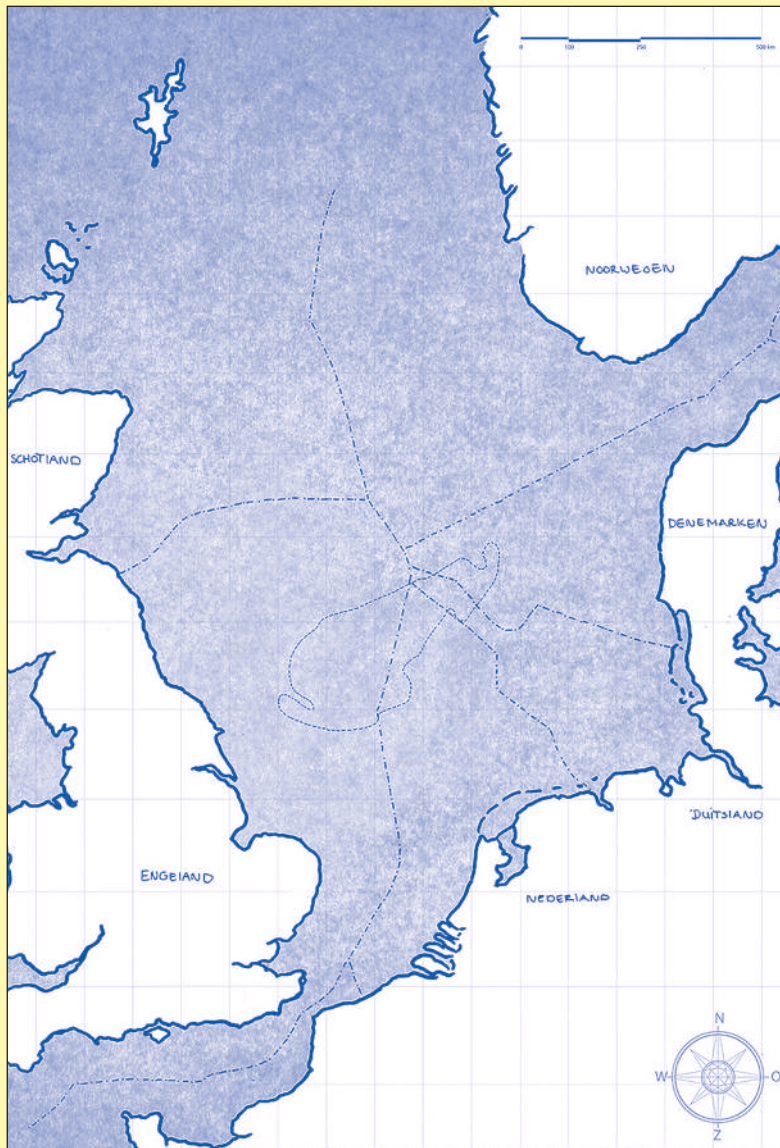
### **The Need for Greater Ambition**

Maintaining the minimum standard is not enough – significant ecological ambition is required to enable the North Sea to recover. It is essential to fully protect vulnerable habitats, species, and ecological processes from human interference. To achieve this, a network of marine protected areas is needed, covering between 30 and 50 percent of the North Sea, with at least 30 percent protected by 2030. This network must include large protected areas where no harmful activities occur, allowing the underwater world the tranquillity, space, and time to recover and thrive. These areas will also provide researchers with reference zones to advance the scientific understanding of the marine ecosystem.

### **Large-Scale Restoration for Active Recovery of Species & Habitats**

In cases where habitats and species have been so severely impacted that they can no longer recover or return on their own, active restoration can provide a solution. On the Dogger Bank, many habitats and species have disappeared. Due to human activity, species such as the common skate, eel, sturgeon, tuna, ocean quahog, and horse mussel have vanished from the area. The natural diversity of the Dogger Bank seabed – once characterised by coarse sand, clay, mud, peat, rocky reefs, coral, and shellfish reefs – has been largely homogenised into a sandy desert by intensive bottom trawling. We aim to implement cross-border active restoration measures on the Dogger Bank in collaboration with a coalition of conservation organisations, governments, and civil society organisations. These efforts are grounded in scientific research to ensure that the resilience, protection, and restoration potential of the Dogger Bank are maximised. We call this Rewilding the Seascape: restoration on a grand scale.

We are starting with the Dogger Bank by demonstrating the level of ambition we expect for all protected marine areas: active and passive restoration of large areas, providing a boost to the North Sea ecosystem as a whole. This means actively intervening in specific locations to help restore the sea, habitats, species, and ecological processes that can no longer recover on their own. For example, by reintroducing shellfish reefs, such as horse mussel reefs, we can restore habitats for octopuses, sharks, skates, and many other species that have been decimated by fishing and habitat loss. Through these efforts, we aim to show what a restored North Sea can look like and what it can mean for us. The combination of passive and active restoration, alongside improved representation of the North Sea in the legal, public, and political domains, forms the key components of the Dogger Bank Blueprint for a renewed human relationship with the living system that is the North Sea.



THE NORTH SEA & THE DOGGER BANK  
Image: Ziege van den Berk, 2020



The NORTH SEA, with the DOGGER BANK Designation Decree with maps  
Image: Gundega Strauberga & Andong Zheng