

The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations –it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF Northern Ireland, National Trust, Friends of the Earth, Irish Whale and Dolphin Group, and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to the Draft Strategy for Marine Protected Areas in the Northern Ireland Inshore Region

Section 1. General comments

The NIMTF welcomes the draft strategy for Northern Ireland’s MPAs and the progress this represents for marine conservation, and the achievement of international, regional and national commitments. As environmental NGOs we are strong advocates for the use of MPAs as a tool for marine conservation, this includes advocating the science of the benefits of MPAs for both benthic and pelagic species, as well as the benefits to communities from MPA designation.

We are broadly positive about the strategy, and its description of the high level goals for creating a network of sites that is coherent for Northern Ireland and fits in to the broader national and bio-geographic network. We welcome the acknowledgement in the strategy of the ecosystem services provided by the marine environment. We are also supportive of the ambition of the network to protect, conserve and (where appropriate) restore biodiversity. The NIMTF welcomes the inclusion of mobile species within the strategy, with the statement that MCZs ‘will conserve and aid the recovery of ...areas important for specific life-cycle stages of mobile species, such as feeding, spawning and nursery grounds’. We wish to see the network of sites protecting the full range of mobile species in our inshore waters, including cetaceans and seabirds. As stakeholders with a strong interest in the development of the MPA network we have structured this response by noting the areas that we believe needs additional detail or clarity to provide clear commitments and an informative overview of the process.

Section 2. Specific comments on strategy

2.1. Clarity over the purpose of the strategy

In relation to the scope of the strategy there appears to be conflicting messages throughout the document. It is unclear whether it is simply the MPA strategy (as stated under ‘Purpose’, page 2),

or a broader NI Marine Conservation strategy. Whilst the NIMTF supports the movement towards joined up thinking, there is not sufficient detail on the monitoring programs or targets for MSFD to make this the general Marine Conservation strategy. Point 1.7 on page 2 appears to suggest that it is a more general strategy: ‘this draft Strategy explains Northern Ireland’s approach to inshore marine nature conservation’, and then again on page 7 under ‘Timescales’ it states ‘this Strategy sets out what we intend to do between now and the end of 2020 to contribute to establishing an ecologically coherent UK network of MPAs and makes provision for longer term actions to meet Marine Strategy Framework Directive (MSFD) duties and obligations.’

The NIMTF is not suggesting that the MPA strategy needs to be converted into a marine conservation strategy, however we think that it should be clear that its focus is on MPAs as a tool within the Department’s broader conservation strategy. It should also provide details and links to both existing and future strategies in the other streams. Given the numerous developments in marine conservation, the NIMTF does believe that an overarching marine conservation strategy could be useful to identify the different work streams and their inter-linkages with each other. This could potentially be incorporated as part of the marine plan process.

2.2. Aims & Objectives to include clearer linkages to relevant work streams (MSP & MSFD)

We believe that a specific MPA strategy needs to include a more detailed description of the work areas needed to bring about the UK/NI vision for a healthy and productive marine environment.

As part of this we believe that Marine Spatial Planning should be treated as a defined work stream. It is currently mentioned only as a relevant target under the timescales section (page 7), and it is our view that it is not sufficiently linked to the marine conservation process. It is the NIMTF’s view that MSP and MPAs should be part of a holistic process to deliver the marine vision. Nature conservation should be fully integrated into and nested at the centre of marine spatial planning, as a mechanism for achieving a healthy marine environment, as well as a pillar of sustainable development.¹ Marine Spatial Planning therefore needs to include planning the human uses of the sea with full consideration of those areas identified as priorities for conservation, either because of their sensitivity to human pressure, or because they are important in forming the representative and coherent network. The NIMTF does not wish MPAs to become islands of biodiversity in otherwise barren seas.

¹Kyriazi, Z., Maes, F., Rabaut, M., Vincx, M. & Degraer, S. The integration of nature conservation into the marine spatial planning process. *Marine Policy* **38**, 133–139 (2013).

The NIMTF believes that the strategy should also provide links to the other work streams for marine conservation and biodiversity programmes. In addition, we feel that the strategy should at the very least provide a clear and detailed description of the other marine conservation developments, such as the MSFD monitoring programs, including those programs that are already developed, and those that are being prepared for the UK wide MSFD monitoring consultation. The section on monitoring does not provide any detail on what programs are already underway, either within existing MPAs or outside of them. The strategy should provide detail on the relevant UK MSFD targets for biodiversity, food webs and habitat descriptors and it should tie in to the future Northern Ireland Biodiversity Strategy and its marine targets. The strategy should also join up with the future NI Marine Science Strategy. These linkages are important, as the strategy needs to identify all the marine conservation programmes that are underway or being planned, to clearly show how the MPA work fits in with overall goals.

2.3. Engagement with stakeholders, time scales & clear description of MCZ process

The NIMTF believes that the strategy requires more detail on how stakeholders are going to be engaged. This is relevant to both the objectives section and the specific section on stakeholder engagement. While ‘effective’ stakeholder engagement is referred to, it is not clear how this will happen, or what it actually means.

It would be useful to include the proposed timeframes for the MCZ process within the strategy, as stakeholders need to understand when their input will be most useful. For example a statement about when the network guidance will be produced, and the priority features listed; when (and if) third party proposals will be considered and the process that this will involve. Additional detail on the Department’s approach for choosing sites and the role for stakeholders during the designation process would be particularly useful. It is unclear whether Northern Ireland will be adopting or adapting the Scottish MPA approach, or inventing a different framework for MPA designation/stakeholder engagement. This is important information for stakeholders in understanding the strategic direction of the MPA process. Although workshops are referred to in the strategy, as well as ‘effective stakeholder engagement’ it is not clearly articulated what the purpose of the workshops will be, or what effective engagement involves. In addition, whilst the NIMTF welcomes the news that Strangford Lough is the first MCZ to be designated, it would be useful to know the timeframes and process for management post designation.

It is also unclear from the strategy whether an impact assessment will be required during MCZ designation, and if so, whether this will include information on the economic and social benefits

to communities from designation. We believe that additional detail is required to explain this process, and what baseline data will be used for economic assumptions of cost/benefits etc.

2.4. Ambiguity of commitments to network design.

The paragraphs dealing with the network design, including the seven OSPAR principles need to contain a specific commitment from the Department for their use in creating the network. Without a clear commitment the strategy leaves the stakeholder uncertain about whether the OSPAR principles will be used exclusively; in combination with other design principles; used in part; or in their entirety.

The NIMTF is pleased to see that resilience is included in the list of design criteria. We also acknowledge that there is a commitment to using ‘best available evidence’ and we would further welcome additional details about the levels of evidence required to meet this criteria. It is important that a consistent position is maintained by the Department throughout the MPA process on levels of evidence and that this is clearly explained to stakeholders.

2.5. Ecological coherence over multiple scales

The NIMTF welcomes this multi-scale approach to ecological coherence, as a positive and logical approach to developing networks which provide benefits to Northern Ireland and which contributes to the network under development at UK and bio-geographic scales. We feel that this strategy would benefit from further clarification of how this joined up approach to ecological coherence will be developed, ie. through joint working with JNCC and consideration of design principles across the broader scale. We also feel that broader ecological coherence should consider sites in the Republic of Ireland and Isle of Man, and that the Department should actively liaise with counterparts in both these countries on the integration of NI MPA networks with their MPAs.

2.6. Need a focus on representative network as well as ecological coherence

The NIMTF appreciates that the Department has committed to creating an ecologically coherent network of MPAs, which includes representativity as a design principle. We would note however that the Convention on Biological Diversity and the 2002 WSSD Plan of Implementation commits countries to both a representative *and* ecologically coherent network of sites. This emphasises the need for this strategy to create a network which is both fully representative of the species and habitats and features found in our waters, and which is also coherent according to the OSPAR principles. We think that the reference in the strategy to the ‘range of marine



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biodiversity in our waters’ should include the work ‘representative’ to reiterate the importance of creating a representative network.

2.7.Lack of gap analysis for existing MPAs

The strategy would benefit from a preliminary analysis of the existing MPA network, suggesting where the key gaps are in the EU marine site network, and the need for additional sites to make a representative and coherent network. The map of existing sites would also benefit from information about what species/habitats are protected within each site. it would assist the strategy if it clearly identified the gaps in the existing protected areas with marine components with respect to the size / number of sites and features protected or levels of protection as well as effectiveness of management. We believe that this would help make the clear strategic case for the need for MPAs and the overall network.

2.8.Sustainable development

The NIMTF believes that the strategy needs to include the Department’s (and NI Government’s) working definition of sustainable development, and that the strategy should emphasise that the management of the marine environment should ensure sustainable use/development, rather than suggesting that environmental management and MPAs should promote it. We feel that the use of the word ‘promote’ suggests too great a bias towards actively increasing development in MPAs, which may not be consistent with their conservation objectives (regardless of whether the activity is generally considered sustainable). This strategy should also make reference to the Marine Act’s first clause around the achievement of sustainable development. It currently states that the OFMDFM office is responsible for sustainable development, however we would argue that the Department, under the Marine Act, also shares a large part of the responsibility for ensuring that sustainable development is furthered.

In addition to the definition of sustainable development, we feel that the strategy’s glossary should also include definitions for ‘ecosystem based approach’, and the ‘precautionary principle’.

2.9.Climate change

There is very little mention of climate change within the strategy. We strongly believe that any strategic document about the marine environment should include climate change, its mitigation and adaptation. This should include identifying programmes for monitoring the impact of climate change on protected features and the broader ecosystem, and the potential for boundary

alteration of MCZs based on climate induced changes in feature distribution. The NIMTF strongly believes that the MPA strategy should consider the benefits of designating sites for resilience, mitigation and adaptation to climate change

2.10. Geo-diversity

The NIMTF welcomes the commitment to include features of geo-diversity within the MPA network. We would urge that the strategy include a strong focus on geological features, given Northern Ireland’s high level of diversity. We feel that as it is currently written the strategy does not emphasise this diversity sufficiently, or the need for its protection.

2.11. Highly protected areas

The NIMTF believes that the strategy should include specific consideration of highly protected MPAs, and their benefits to certain species/habitats/features. It is the NIMTF’s view that the future network should include some highly protected MPAs to ensure that particularly vulnerable ecosystems are provided adequate protection. It is also our view that highly protected MPAs provide benefits to communities, such as to fishing communities from replenishment of commercial species, and are also able to provide a scientific reference point for research on human impacts.

2.12. Lack of clear description of how economic, social and cultural factors including displacement will be considered.

The NIMTF believes that the strategy needs to lay out clearly how economic and social factors will be included in the process. This includes describing how displacement of activity will be considered, and the impact on the environment should a site not be designated. It would be useful to understand, as stakeholders, what level of evidence is going to be required for social/economic consequences, and how stakeholders can provide information on this and other aspects (ie. benefits of designation).

2.13. Feature based approach

The NIMTF remains concerned at the potential implications of the feature based approach described in the strategy. The NIMTF believes that MPAs should provide overall conservation benefit to the designated area, including the broader ecosystem. We do understand that the current legislation is set up for protecting ‘features’, however this need not inhibit a holistic approach to MPA designation and management if the Department were to develop an approach that managed each site in its entirety. However, if a feature based approach is to be used, we



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wish to see all the known species and habitats occurring within a proposed site to be included as features. We would also like there to be regular review and the flexibility to adapt the features protected should changes brought about by climate change or invasive species (for example) make this necessary.

2.14. Enforcement

The NIMTF believes that further clarity is needed in this section, particularly in relation to the enforcement of fisheries/licensing which is to be managed by another NI Department. The strategic document should describe how this relationship will work and the processes that will be undertaken during the management and enforcement of sites. In addition, the strategy (at point 5.8) states that ‘the draft Marine Bill contains provisions which will extend the ‘common enforcement powers’ provided for in the Marine and Coastal Access Act 2009 to all designated MCZs.’ It is unclear whether this also covers the EU Marine Sites, as the Marine Bill also included these sites under the new enforcement powers.

The strategy should also include a section on public education, and how new MCZs and their protection levels will be communicated to the public and sea-users.

2.15. Financing

The strategy needs to provide a clear outline of how the network of MPAs will be financed, including the financing of enforcement activities. The management of the future MPA network will require financing throughout the long term, and so it is important that this issue is given strategic importance.

2.16. Inclusion of additional international targets

The NIMTF notes that the commitments under the World Parks Congress 2003, Durban² were not included in the strategy. We also believe that the time scales on page 7 should include meeting the 2020 Aichi target of halting and reversing biodiversity loss.

Section 3. Concluding comments

The NIMTF welcomes this strategy and its overall positive approach to creating MPA networks for both Northern Ireland and contributing to the broader network across a bio-geographic scale. We believe that additional clarity, as outlined in this response would make the strategy tighter and clearer in its commitments. This would assist stakeholders to prepare for the MPA process,

² <https://cmsdata.iucn.org/downloads/durbanactionen.pdf>

manage expectations and actively engage in the process with the right knowledge, data and information. The NIMTF also believes that this strategy has highlighted the need for a clear and detailed over-arching strategy for the full marine conservation/marine planning work streams, to provide a cohesive and joined up approach to protecting the marine environment. The MPA strategy would also benefit from clear and detailed links to these other streams.

We look forward to receiving more information on the process, such as the MPA network guidance and information on how we can engage with this process as a coalition of environmental NGOs.

If you have any questions about our response, please contact Marguerite Tarzia, NIMTF Marine Technical Officer.

For further details please contact the NIMTF

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