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**RE: *Towards an Integrated Marine Plan for Ireland - Seeking your views on New Ways; New Approaches; New Thinking***

Dear Sir/Madam

The Environmental Pillar welcomes an Integrated Marine Plan but submits that the report focuses too much on viewing the marine environment as a resource that should be exploited while frequently losing sight of the need to protect and conserve this resource. The authors of the document point out that 'implementation, particularly in relation to environmental EU legislation has proved to be challenging', yet a whole new range of further developments is being envisaged without designing any mechanisms or strategies that are going to improve implementation of environmental legislation and compliance. These should include (but not be restricted to) the enforcement of monitoring requirements and the timely and comprehensive public release of monitoring data as well as the imposition of significant fines and penalties in cases of non-compliance. Proactive release of data (as is customary with IPPC licenses on land) would also greatly improve public confidence in the industry.

Furthermore the Environmental Pillar supports the designation of an ecologically coherent network of Marine Protected Areas. This network would significantly exceed the number of marine SAC's designated by the NPWS by combining NATURA 2000, Ramsar sites, Marine Conservation Zones and NHA's (after the UK model). MPA's would enjoy a similar level of protection from exploitation and development as SAC's and SPA's and could be promoted by the tourism sector as Marine parks or nature reserves. Finally we wish to submit the following comments and suggestions in relation to the Integrated Marine Plan for Ireland:

**Q1** *In 2007, Ireland generated €3.4 billion in turnover, €2.4 billion direct and indirect GVA2 (1.2% of GDP) from our ocean resources. It is generally believed this performance could be substantially improved.*

*What is a sufficiently ambitious yet realistic target for our ocean economy by 2020?*

On page 2 of Briefing document I, it is stated that an evaluation of the Irish Ocean Economy in terms of GDP and GVA 'relate only to traded products and services. As such it makes no or little allowance for natural resource use, ecosystem goods and services or the costs of environmental degradation.' Instead, this question should relate to TEV's (Total Economic values), which, as is stated in the briefing document, incorporate both market and non-market values and costs. We are concerned, and this concern is also expressed in your document, that national policy based improvements in GDP and GVA instead of TEV undervalues marine resources resulting in poorly planned unsustainable exploitation.

In relation to employment in the 'Ocean Economy' the majority of marine sector career opportunities discussed in Briefing document III apply to professionals and 3<sup>rd</sup> level graduates. However, as explored during the conference on Socio-economic aspects of fisheries management held in Dublin in 2010

([www.nwwrac.org/Meetings/Meetings\\_ENG/Navigation.php?id=427&language=English](http://www.nwwrac.org/Meetings/Meetings_ENG/Navigation.php?id=427&language=English)), creation of employment should be more inclusive and imaginative and should specifically aim to halt the continuing decline in small scale and traditional employment. For instance, employment in the seafood sector could be significantly and sustainably increased by hiring observers for the Irish Fishing fleet. Such a scheme would not only help to improve compliance with regulation but would also fill important knowledge gaps in relation to by-catch and by-kill. Local coastal surveillance officers could have a similar role in relation to aquaculture operations and ports. Such an approach would boost sustainable development, protect biodiversity and coastal infrastructure, support R&D and improve social inclusion as it would provide employment in coastal communities that have been particularly affected by collapsing fishing stocks and fisheries restrictions.

Even in relation to job creation for more highly qualified professionals, there should be a stronger emphasis on integrating sustainability and resource efficiency into all sectors. For instance marine engineers should focus on issues such as the selectivity of fishing gear and the fuel requirements of the fishing fleet (as well as their carbon footprint).

**Q2** *What contributions can:*

- (a) the private sector make to achieving growth potential in this area?*
- (b) the public sector make to create an environment that provides the conditions needed for economic growth, investment and job creation in the ocean economy?*
- (c) our communities make to the achievement of our growth potential?*
- (d) the higher education sector make to the achievement of our growth potential?*

While this is a valid question, it is essential to balance it with a second question on contributions of the private, public, community and higher

education sectors to achieving adequate protection and sustainable use of our marine resources.

a) Commercial developments profit by utilizing a commonly owned resource. In return they should be obliged to contribute to a dedicated environmental fund that is used to finance, for example, observer and license enforcement schemes, construction of coastal erosion mitigation measures, and development of better selective fishing gear. This fund could also be used to remove coastal litter and abandoned and defunct infrastructure such as old aquaculture trestles and cages. As discussed above these schemes would also provide much-needed employment in local communities. Furthermore an environmental guarantee scheme should be included in all license conditions, the amount of which should be proportionate to the environmental risk of the development. For instance, an environmental guarantee scheme for an oil-production license should be large enough to cover an onshore and offshore oil clean-up operation in the event of a spill.

b) In relation to the public sector, the powers and resources of the Sea Fisheries Protection Agency should be enhanced in order to improve license monitoring and enforcement. Environmental conservation and resource efficiency should be taken into account by all government departments irrespective of their specific remit. R&D should favour selectivity/ sustainability/ value-added production over absolute capacity.

c) Local communities are chief stakeholders of the local coastal environment and their involvement in coastal developments should go beyond mandatory public consultation processes. For instance there should be a greater emphasis on informing the public on planned coastal and marine developments. Independent Appeals Boards should provide for local community representation.

d) As outlined in Briefing Document III, the higher education sector should respond to the new skill sets and cross-sectoral expertise required by the 'Ocean Economy'. However, it is essential that training and research in all sectors, as a matter of course, reflect on the environmental impacts arising from various types of development.

**Q3** *What actions should be taken to strengthen our maritime awareness/identity?*

- The designation of a network of Marine Protected Areas (as mentioned above) would strengthen the view in the public mind that marine ecosystems can be as complex and valuable as any on dry land. Marine parks or nature reserves are used to great effect in some countries (e.g. Costa Rica, Croatia) with way-marked snorkelling routes that encourage people to open their eyes to life under the waves.
- The extension of the Wildlife Act to protect marine species with currently no legal status e.g. sharks (specifically the basking shark, the world's second largest fish, has no protection other than a ban on landings), rays, and other charismatic marine species (given that seals, whales and dolphins already enjoy such protection).

- Gather data to produce a Red List of groups of marine species so that conservation efforts can be targeted (as is being done for terrestrial species).
- Investment in marine education with corresponding career outlets in value-added areas of fisheries/tourism etc.
- Provision of better and safer coastal walking and cycling routes
- Promotion of eco-tourism and angling

**Q4** *Is the draft vision for Our Ocean Wealth sufficiently ambitious and realistic or would you suggest an alternative?*

*“By 2020 our ocean wealth will be a key element of our sustainable economic growth. It will be managed in an integrated manner and supported by coherent policy, planning and regulation, generating economic, social and environmental benefits for our citizens.”*

Rather worryingly this question reflects a continued exclusive focus on ‘economic growth’, an emphasis which has caused so many environmental problems in the past. It is essential that there is a change in the mind-set of decision makers that all future development in the ‘Ocean Economy’ must go hand-in-hand with the sustainable and fair use of marine resources. In addition to this it must be recognised that there are very serious knowledge gaps in relation to the social and economic situation of coastal communities in Ireland. In fact, within Europe, Ireland is among the poorest performing nations for providing socio-economic data ([www.nwwrac.org/Meetings/Meetings\\_ENG/Navigation.php?id=427&language=English](http://www.nwwrac.org/Meetings/Meetings_ENG/Navigation.php?id=427&language=English)). In our opinion, these knowledge gaps need to be addressed (by bodies such as the Socio-Economic Marine Research Unit within the Data Collection Framework) before a meaningful and integrated marine plan with real benefits to local communities can be drawn up. These baseline data would also help to monitor any improvements in the welfare of coastal communities resulting from measures that are being implemented. There are also significant knowledge gaps regarding the distribution of marine biodiversity and the presence of significant ‘hot spots’ both in-shore and off-shore. While progress has been made in the identification of important marine habitats at a European level this very focus overlooks wider biodiversity features that merit protected at a national or local level.

**Q5** *How can we maximise the benefits of our ocean wealth and protect the marine ecosystem/environment?*

Generally:

- By ensuring that environmental legislation is enforced and complied with. This can be achieved by monitoring compliance with license conditions, imposing meaningful financial fines in case of non-compliance, providing public access to monitoring results, ensuring a clear separation between license holders and license inspectors

- By expanding the already existing list of marine SAC's drawn up by NPWS ([www.npws.ie/protectedsites/osparsites/](http://www.npws.ie/protectedsites/osparsites/)) and establishing an ecologically coherent network of Marine Protected Areas. Following the UK model (<http://jncc.defra.gov.uk/page-4549>) these MPA's would include Natura 2000 and Ramsar sites, NHA's pNHA's and Marine Conservation Zones (designated to protect nationally important marine wildlife, habitats, geology and geomorphology in inshore and offshore waters). These areas should be recognised, dedicated and managed, to achieve the long-term conservation of nature with associated ecosystem services and cultural values. Level protection and the instruments used should be similar or identical to those used for the protection of SAC's and SPA's.
- By establishing a data collection network for marine biodiversity through linking existing large-scale research by the Marine Institute, with small-scale, amateur data recording e.g. by recreational SCUBA diving clubs, and the National Biodiversity Data Centre.
- By reviewing past errors committed in the coastal and marine environment and putting in place checks and balances that will prevent their recurrence
- By recognising that uncompromising commercial exploitation will not provide the best economic return nor value of resource (as demonstrated by the Marine Stewardship council ([www.msc.org/](http://www.msc.org/)) and illustrated by recent commercial fisheries history)
- By implementing programmes aimed to reduce coastal and marine litter

More specifically:

- By establishing an Inshore Fisheries Forum with NGO and local community representation
- By improving regulation of fisheries. As outlined above this could be achieved by implementing observer regimes, ensuring total traceability and open/transparent stakeholder involvement
- End subsidies that incentivise large scale trawling

**Q6** *How can the interests of competing sectors be balanced when it comes to planning the use of our ocean space and what criteria should be used to balance them?*

A Marine Authority should be created to coordinate the planning process at sea in an open and transparent manner, similar to that which exists above the high tide mark.

A better balance would be achieved by including a well-resourced 'Biodiversity and Environmental conservation sector' in the discussion and decision-making. Considering that at the end of the day all of the competing sectors are dependent on a healthy and stable coastal and marine environment, any decision that impacts on this environment should be consistent with the Ecosystem Approach and the Precautionary Principle'. Marine Spatial Strategy and Planning should be subject to local, regional, national and international scrutiny.

**Q7** *To what extent could the development of a Maritime Spatial Plan assist in this balancing process?*

- By ensuring that the Plan emphasizes the Ecosystem Approach and puts mechanisms in place that guarantee environmental law enforcement and compliance.
- By enabling participation of independent stakeholders in the cross-governmental marine coordination group

**Q8** *Are the opportunities and constraints identified the right ones? (See Page 11 and the sectoral briefing document which is available on [www.ouroceanwealth.ie](http://www.ouroceanwealth.ie). Are the 'Enablers' the right ones to be focussing on in order to unlock the potential of our oceans? (See Page 16 & 17 and the briefing document III: Getting the Conditions Right which is available on [www.ouroceanwealth.ie](http://www.ouroceanwealth.ie))*

General challenges:

- As demonstrated by several ECJ judgements against Ireland for failure to implement and enforce environmental legislation, there is generally poor environmental awareness at all levels of government
- Although many policy documents set ambitious targets for environmental sustainability and biodiversity protection (see Briefing document III), they tend to be aspirational, non-specific, and non-committal and generally do not translate to the situation on the ground. In most decision-making processes, representation by the environmental sector is poor. 'Public consultation' is often little more than a 'tick-box' exercise rather than a meaningful process to enhance outcomes.
- Recent funding cuts for environmental agencies such as the NPWS and the Heritage Council have been disproportionate while funding for environmental NGO's is perpetually uncertain and tardy. An underfunded and principally voluntary environmental sector therefore has to compete with well-financed and resourced industry lobbyists.

Seafood sector:

a) Aquaculture

- The section provides no strategy or mechanism to address the failure of the aquaculture industry 'to integrate environmental management systems into the core business functions' (as stated on p 2, briefing document II), although one might argue that this would be critical to the sustainable expansion of the industry in Ireland
- According to this section, 'Ireland has an established and a comprehensive system of environmental [and food safety] monitoring for the aquaculture industry' (p 3). However, this information is not readily or publicly available. Timely and comprehensive release of monitoring data (as is customary with IPPC licenses on land) would greatly improve public confidence in the industry
- Licensing and funding difficulties are listed as the only constraint for the aquaculture sector (p 4). These 'licensing difficulties' arise out of the requirement to comply with Environmental legislation. Surely if the sector

were serious about promoting ‘environmentally sustainable production’ (p 8), compliance with environmental legislation would be regarded as matter of course, not a difficulty to be overcome.

- ‘Constraints to aquaculture’ fail to mention limits to the capacity of the environment to absorb impacts from aquaculture operations. This is an extremely important issue to address if the industry is to be sustainable and long term. Too many operations within a bay will lead to environmental degradation which will ultimately result in the exclusion of aquaculture activities.
- In the last decade the Irish salmon aquaculture sector experienced a strong contraction due to oversupply and poor market price (BIM, Status of Irish Aquaculture, 2007). According to the industry itself, market price is subject to strong fluctuations (Marine Harvest, quarterly reports). The Briefing Document (part II) quotes reduced prices for seafood products as a considerable challenge to the aquaculture sector. At the same time, the cost of sea louse mitigation measures and salmon feed continue to increase. This imbalance raises serious questions as to the long-term commercial viability of the salmon farming industry and the employment provided by it.

#### b) Wild fisheries

- Protection of nursery areas from destructive fishing methods, benthic trawling and dredging should be prioritized
- Fishing mortalities caused by Technical Conservation Measures (so called ‘by-kill’) should be determined before promoting the widespread use of the selective gear as a conservation measure
- Fisheries should be managed by functional unit rather than ICES Areas
- There should be a network of MPA’s which enjoy various levels of protection from fishing (see answer to Q5)

#### Shipping

- We very much welcome the plan ‘to provide regulation to ensure compliance with international and national requirements to preserve and protect the marine environment from Ship Source Pollution Prevention’ (p13), but can’t identify which one of the strategies listed is going to help to achieve this objective

#### Renewable energy

- RE project must fully assess all direct and indirect as well as cumulative impacts on the marine environment

#### Offshore oil, gas & minerals

- There is no evidence whatsoever that the author of this section has considered oil, gas or mineral extraction in relation to other marine sectors or if and how these activities can be carried out in an integrated and environmentally sustainable fashion. It makes strange reading in a document that is ostensibly about ‘sustainable integrated development aimed to generate economic, social and environmental benefits for our citizens’.

- The Irish fiscal rate for oil or gas production is one of the lowest in the world and can be offset against the cost of the project. Consequently the potential financial return to the state from this sector is low and does not in any way offset the potential environment impact arising from the activity.
- Once a company has been granted a license to extract oil or gas, it is under no obligation to sell its product to the Irish State. It is therefore difficult to see how these projects can help to secure Ireland's national energy supply
- As there are few workers in Ireland with expertise in oil and gas exploration and extraction, many companies transfer their employees from other, larger sites in Scotland and Scandinavia. Therefore indigenous employment arising from the sector is likely to be very low.
- Smaller oil companies that according to this document are specifically incentivised into Ireland are less likely to have the financial capital available to deal with large scale oil spills and emergencies should they arise
- Current employment figures and fiscal take arising from the sector are lacking from the briefing document and should be provided.

#### Tourism:

- This section fails to accord any real priority to sustainable marine (eco) tourism or to ascribe any significant value to it
- Even though 'coastal walking' is listed as a 'product gap' in the vast majority of counties (p 35), improving accessibility does not appear to be a priority. Coastal cycling is not even mentioned.
- There is significant potential to marry the goals of marine conservation and tourism e.g. by creating MPAs that exclude all fishing or commercial activity in favour of snorkelling, diving, kayaking, sea bird watching and other non-destructive activities.

#### 'Enablers':

Two very important 'enablers' to implementing an integrated and sustainable marine plan for Ireland are (i) access to information & transparency and (ii) implementation and enforcement of environmental legislation.

- (i) Access to monitoring data collected under licensing conditions is generally very poor. Bearing in mind that coastal and marine developments utilise a commonly owned resource being located in a commonly owned space, an obligation to release their monitoring data in a comprehensive and timely fashion should be self-evident. We welcome the EU INSPIRE Directive and hope it will improve access to environmental data.
- (ii) Briefing document III freely admits that 'implementation, particularly in relation to environmental EU legislation has proved to be challenging' (p 5), **yet we see no mechanism or strategy that is going to be put in place to improve implementation and compliance.** It is questionable whether the 'Roadmap to compliance' has led to greater protection of N2000 sites. Because most conservation objectives drawn up under the 'roadmap' are generic, it will be difficult to evaluate successes or failures of Fisheries Natura Plans.

**Q9** *How can we ensure appropriate governance in national maritime affairs for optimal results (at local, regional, national, European and international level)?*

All stakeholders including the environmental sector and the public, should be facilitated and encouraged to participate in the Marine Coordination group. Participants not from the public or private sector should be sufficiently and independently briefed so that they can prepare and formulate evidence-based responses and comments (after the model of the ‘frontloading’ approach taken by Regional Advisory Councils).

**Q10** *Suggest ways we can foster and / integrate marine policy and planning in Ireland? With less resources, how can we do it better?*

In Briefing Document II each marine sectors is presented in turn with no conceivable attempt at assessing synergistic or conflicting interests and needs. In order to achieve integration the plan will have to be discussed by all stakeholders in inclusive manner, while addressing environmental, resource and financial restrictions. Such an approach would help to reduce duplication, improving efficiency across sectors, and planning.

*Having read the background material do you have any specific suggestions / ideas/ comments on what we can do to realise the potential of our ocean wealth?*

The plan is strongly weighted toward industry and economic rather than sustainable development and the environment. Integration of the sector targets and ambitions needs to be backed up by more hard facts and analysis to be credible and stress tested by rigorous stakeholder discussion and review. In this context, it is essential to seek input from ‘bottom-up’ stakeholders and disenfranchised, marginalised communities. Socio-economic data, in so far as it even exists, is imprecise (e.g. of the total employment in the ‘ocean economy’ of 17,000, 11,000 are said to be working in the Seafood Sector with another 5,836 people in tourism (according to Briefing document II) leaving just 164 jobs for all of the remaining sectors!) and is all but ignored. Returns to coastal communities and state are not adequately evaluated. Most deliverables lack resources and time lines.

*Whilst this document was developed through the processes of the Environmental Pillar it does not necessarily represent the policies of all its members.*

*Environmental Pillar members:* An Taisce. Bat Conservation Ireland, BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coast Watch. Coomhola Salmon Trust. Crann. ECO UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan Ireland, Gluaiseacht. Grian. Hedge Laying Association of Ireland. Irish Doctors Environment Association. Irish Natural Forestry Foundation. Irish Peatland Conservation Council. Irish Seal Sanctuary. Irish Seed Saver Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. The Organic Centre. Sonairte. Sustainable Ireland Cooperative. VOICE. Zero Waste Alliance Ireland

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