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### **Marine Planning Policy Statement – Irish Wildlife Trust Consultation Response**

**HOOW Goals.** The IWT believes that a healthy ocean economy is not possible without a healthy ocean. We welcome the highlighting of the non-monetary value of the marine environment in Goal 2 and 3 of HOOW however, this needs to be much more prominent than we have seen to-date. Ecosystem protection measures which are so badly needed must be to the fore. We agree that Ireland’s rich maritime heritage should be strengthened, as this will increase people’s connection with the marine environment and add to the awareness of our rich maritime culture.

**Forward planning/Marine Spatial Planning:** This paragraph states that *‘The plan will also set out the proposed future approach to the adoption of spatial designations for marine activities or designated marine protected areas, and taking account of the existing network of **designated** European sites under the Habitats or Birds Directives by the Minister for Culture, Heritage and the Gaeltacht.’* There are currently 94 out of 248 marine Natura 2000 sites listed as cSACs even though the six year deadline for designation as SACs has passed. We urge that these sites be included in the NMPF as they contain important and vulnerable marine habitats which need to be accounted for during licensing processes.

Marine Protection Areas should not be merely confined to existing Natura 2000 areas. They should be based on restoring healthy marine ecosystems and be used as a means to manage activities in the marine sphere, especially low-impact fishing where there are potential wins for both biodiversity and coastal communities.

**Sectoral policies.** We appreciate that each sector will have its own set of specific objectives and marine planning policies. We urge that each sector includes an overarching policy highlighting the importance of marine environmental health and sustainable development.



**The Marine Planning and Development Management Bill 2019.** We welcome the Marine Planning and Development Management Bill 2019 and hope that this legislation will come through swiftly so that the designation process of marine protected areas under the Marine Strategy Framework Directive can begin.

**Climate change.** We agree with the mention of climate breakdown in association with marine spatial planning. The two are very much interlinked due to the mentioned high carbon emitting marine sectors, which include fishing. We would like to make the link between MPAs and the climate crisis because well-managed MPAs that ban damaging activities have shown incredible recovery of seafloor ecosystems. Habitats that benefit the most from a ban of damaging activities tend to be carbon rich coral reefs, maerl beds, kelp forests, seagrass beds and even oyster and mussel beds. These habitats, if left to grow and reproduce, can draw down large amounts of carbon from the atmosphere, contributing to climate change mitigation. Furthermore, these habitats mostly occur near our coastline where their three-dimensional nature can decrease storm surge thereby contributing to climate change adaptation. Incorporating nature's ecosystem services into the *Government Climate Plan to Tackle Climate Breakdown* and designating highly protected marine areas as a result would truly make Ireland a leader in responding to climate change.

**Marine Environment.** IWT welcomes the paragraph highlighting the importance of clean and healthy seas. We support the ecosystem approach to managing human activities in the marine environment. We would add that the precautionary principle is also of high importance due to the many unknowns we still face with regard to biodiversity and the dynamic nature of ocean systems. A well connected network of MPAs are again a great tool to ensure sustainability through increasing resilience of ecosystems and allowing species to move between protected sites undisturbed.

**Strategic Principles.** The overarching principles highlight the need for ecosystem restoration and maintenance as well as the importance of Good Environmental Status and climate resilience. It is important that these principles are followed strictly.

**Key priorities.** We agree with the key priorities and hope that they are followed strictly.



**Final comments.** Is it our understanding that the NMPF will adopt a hybrid approach between strict zoning and policy based spatial planning. We support this approach because it allows for nature protection areas to be zoned off. We would suggest that while many vulnerable habitats are located outside of protected sites, the location of these habitats should be mapped and used to inform the licensing decisions of any future development at sea. This way, any potential impacts caused to these habitats can be avoided/mitigated against and the area may be designated as a protected area in the future. In short, the location of vulnerable habitats should be part of the NMPF, even outside of protected areas.