



Irish Wildlife Trust
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Irish Wildlife Trust submission to the EU Oceans Pact

To whom it may concern,

The Irish Wildlife Trust (IWT) is a non-governmental organisation with charitable status that was established in 1979 to speak out for wildlife and its benefit for people. We welcome the opportunity to submit to this consultation on the EU Ocean Pact

The EU Ocean Pact represents an opportunity to strengthen and implement the enforcement of EU environmental and ocean policies. It's important that the Oceans Pact is comprehensive and includes a clear roadmap for the actions which will be taken to ensure enforcement and monitoring of the pact. Sustainability and ecological limits must take priority over economic growth for the underpinning framework for the Ocean Pact. A just transition away from destructive activities needs to be enabled, with communities affected provided with support to ensure this is a viable option. Without this, the future of any blue economy will be precarious as the marine ecosystem continues to deteriorate. An EU Ocean Fund to facilitate this just transition should be adopted.

There are numerous ocean related EU laws and policies and due to their complexity it is necessary to create a framework to ensure coherence between the legally binding targets within them and implementing an ecosystem approach. Alignment between policies such as the MSFD and MSPD is crucial for sustainable use of the marine environment. We welcome the fact that a holistic approach has been mentioned in the drafting of the Oceans Pact.

Strengthening policy coherence and legally binding targets is vital to effectively protect and restore marine ecosystems. New legislation with binding 2030 targets for effectively protecting 30% of Member States seas, including having at least 10% strict protection, as well as banning ecologically destructive fishing practices will help to achieve targets within SDG14. A legal definition of what strict protection entails is also needed to assist Member States in designation and management of protected areas. Protecting an area from harmful anthropogenic activities will allow ecosystem restoration and strong enforcement of the Nature Restoration Regulation needs to be ensured so that Member States meet their targets. Monitoring and implementation of effective national restoration plans must be ensured.

The Common Fisheries Policy has means of ensuring sustainable fisheries but unfortunately, it is not implemented effectively. Ensuring those that use fishing methods with a reduced environmental impact and which incur lower carbon emissions are compensated for their contribution to a sustainable blue economy is vital. According to Article 17 of the CFP they should be given precedence when allocating fishing quotas which would incentivise fisheries to transition to more selective fishing methods. Reopening of the CFP is unnecessary and will result in further degradation of fish populations along with the wider marine ecosystem and the economy. Effective enforcement of the Articles within the law should be the priority as fisheries are not only about fish stocks but about the wider ecosystem services that are provided.