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Irish Wildlife Trust submission to Páirc Náisiúnta na Mara Public Consultation

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 management of Ireland's first Marine National Park.

Key Priorities -

Biodiversity restoration and protection

Many of the areas in Páirc Náisiúnta na Mara already have formal designations under the EU Nature Directives. However, effective implementation of conservation actions and site specific management of many areas are not at the appropriate level that is needed to ensure good conservation status. Biodiversity protection and restoration should be the key priority for the future of Páirc Náisiúnta na Mara. We welcome the fact that the State acquisitioned land to convert into a National Park and we believe it would be a shame and a waste of resources if the areas were incorrectly managed for nature. Key issues in many National Parks around Ireland are the plantations of non-native forestry and the negative ecological effects to native habitats caused by the grazing of deer, sheep and feral goats. These are some of the major issues which need to be addressed urgently so that they aren't repeated.

A main priority should be ensuring that the sites which already have formal legal designations under the EU Birds and Habitats Directives reach their site specific conservation objectives. Clear management plans which document what activities take place in the areas as well as how they are monitored should be made easily available to the public online. Currently, it is

quite difficult to find out what activities are taking place in protected areas. It should be made very clear who is responsible for managing the different areas and what they are responsible for. This will help ensure accountability and openness.

Data collection

Further extensive data collection on the range of biodiversity and the conservation status of the species and habitats found within the different sites should be undertaken. Having this baseline knowledge will be the only way to achieve effective monitoring of the success of the Páirc. Member States are required to report to the European Commission every 6 years on the status of the species and habitats within the Directive and the measures which are being undertaken to protect them. We are coming to the end of the 6 year monitoring cycle in 2025, so a lot of this information should already be gathered. Under the new EU Nature Restoration Law, there are legal obligations on data collection for a number of habitats which are within the Páirc boundaries and detailed plans to achieve these data collection thresholds should be included in the National Restoration Plans as well as the Páircs management plan. Data on the percentage coverage of certain habitat types and how much is needed to be restored to reach the Favourable Reference Area of the habitat is also required under the EU Nature Restoration Law and needs to be undertaken through extensive habitat mapping.

Stakeholder engagement

Management of the Páirc should be guided by stakeholder engagement, including expert input across a variety of sectors. Key stakeholders will include local communities, people who use the areas for their livelihoods, scientific researchers with knowledge on the ecosystems in the areas and environmental NGOs. Below we talk about different aspects in some of the sites. This is not an exhaustive list and some of these points will relate to multiple sites, not just the one they are mentioned under.

Kerry Head Shoals

We are responding in regards to the conservation objectives in the marine and terrestrial sites of the park. One of the marine sites within the Páirc is the Kerry Head Shoals SAC. Within a conservation objectives supporting document (1) put together by NPWS on Kerry Head Shoals, it references the European Commission's Article 17 reporting framework which states that disturbance of greater than 25% of the area of an Annex I habitat represents unfavourable conservation status. NPWS takes the view that licensing of activities likely to cause continuous disturbance of a marine habitat type under Annex I should not exceed an approximate area of 15% and this will help ensure favourable conservation status. We do not believe that this is an ecosystems based interpretation of the reporting framework and believe that this should be revised and not used as a blanket rule. For areas which have rare and vulnerable habitats and species, there should be strict protection implemented where no industrial anthropogenic activities and pressures are allowed. NPWS states that communities that have low resilience and are key contributors to overall biodiversity at a site should be afforded the highest degree of protection, however this doesn't appear to be implemented at this site. Earlier in the document it states that five species of sponge are found at Kerry Head

Shoals and are only found in one or two other locations in Ireland. There is also a broad and extensive list of the other rare flora and fauna found there. According to the SFPA website, there are no Fisheries Natura Declarations for this area restricting any kind of damaging fishing activity and in the Marine Institutes Atlas of Commercial Fisheries around Ireland 4th Edition (2024) it doesn't appear that industrial fishing activity is restricted in this area. Initiating effective management plans along with restrictions to certain activities in this area and others in the park should be a high priority.

Skellig Islands

Marine areas around the Skellig Islands included in the Náisunta Páirc have previously been recognised as globally important through the designation of 'The Greater Skellig Hope Spot' by Mission Blue. Dr. Sylvia Earl, world renowned oceanographer and director of Mission Blue has highlighted the importance of this area for the health of oceans nationally and globally due to the species and habitats found here. Currently there is a high level of industrial fishing occurring around the Skellig islands, even though they are designated as a Special Protection Area for a number of important seabirds who will nest and forage here. Other 'Hope Spots' around the world include The Galapagos Marine Reserve and The Azores. While Hope Spots do not offer any legal protection, many countries have legislation in place to protect these areas or plan to formally designate them in the future. Recently The Azores increased their Marine Protected Areas within the Hope Spot and 30% of Azorean waters are now designated as either fully or highly protected with extractive activities either restricted or banned in the area. This announcement received worldwide recognition. There was an extensive stakeholder engagement process that took place to inform these designations with effective working groups from the fishing industry helping to decide how to restructure the industry to enhance biodiversity and improve economic gains. This system of consultation is a promising step towards greater stakeholder engagement when it comes to the management of protected areas and national parks and we believe there are important lessons which can be taken from it. We welcome this public consultation on how best to manage Páirc Náisúnta na Mara, as well as the consultations which have been undertaken with local communities already. Continuing this process in an in depth, collaborative and meaningful way is vital for the success of the Páirc.

Owenmore River

According to the EPA assessment the Owenmore river is at risk of failing to meet its Water Framework Directive (WFD) objectives by 2027. 'At Risk' water bodies and features require not only implementation of the existing measures described in various regulations, e.g. the Good Agricultural Practices Regulations, but also more targeted supplementary measures. Currently some parts of the Owenmore river have a 'moderate quality Q score' under the River Ecology Monitoring Results and other parts of the river closer to shore show a 'good quality Q score'. It's promising that some parts currently have good status, but as the river is classified as 'At Risk', further targeted measures must be undertaken.

Mount Brandon

In 2023 the EU Court of Justice found Ireland guilty of failing to effectively manage many of its legally protected areas. Blanket bogs were one of the habitats that was included in this analysis as well as the extremely vulnerable freshwater pearl mussel. The European Commission stated that the conservation measures had vague timelines, lacked quantitative terms and did not take into account pressures on bogs from agriculture, peat extraction or drainage. Again, in 2024, the Commission decided to refer Ireland to the Court of Justice over its failure to protect raised and blanket bog habitats. The Commission stated, "While some restoration work has been undertaken on raised bog sites, no action has been taken regarding blanket bog sites where Ireland has failed to put in place an effective regulatory regime to protect these unique bog sites". Mount Brandon is one of the terrestrial sites within the Páirc and blanket bogs as well as freshwater pearl mussels can be found here. Assuring the effective restoration and protection of these sites will be necessary to align with targets in the EU Nature Restoration Law as well as the EU Habitats Directive and to prevent any further legal action being taken against the state. Ensuring there are enough funds ring fenced in the Infrastructure, Climate and Nature fund is vital to ensure that funds are available to finance the delivery of necessary measures as well as compensation payments to landowners who choose to undertake voluntary measures. This would include landowners around the National Parks boundary to help ensure ecological coherence.

Inch Dunes

The Inch Dune system, included within the National Páirc, is also part of Castlemaine Harbour SAC. This SAC is at risk of failing to meet its Water Framework Directive (WFD) objectives by 2027 and many of the habitats within it are designated as being in inadequate or bad conservation status in the NPWS Article 17 overview report 2019 (2). The reason there are habitats in this site in inadequate or bad conservation status is due to human activities which are 'under management'. An analysis of Global Fishing Watch data which uses the Vessel Monitoring System (VMS) attached to vessels, shows that in 2021 there were 118 hours of bottom towed fishing occurring in this site. In 2022 there were 215 hours and in 2023 there were 90 hours (1). VMS is only a legal requirement on vessels over 18m and so this analysis doesn't take into account fishing activity from smaller boats. While only the Inch Dunes are included within the Páirc, the rest of the SAC needs to be effectively managed to ensure the entire ecosystem is functioning and ecologically healthy. Further research into the effects of hydromorphological disturbance caused by dredging within the Harbour should be done to assess what impact may be caused to the dune system. Aside from this, increased measures around the dune system are needed to help them reach good conservation status. This should be underpinned by effective public consultation on the issue.

Challenges

Some challenges the Páirc will face will be the increase in effort needed to manage the areas effectively for nature. As well as the officially designated sites, areas between these boundaries should also be kept in good ecological status to ensure connectivity and result in the Páirc becoming more than just the sum of its parts. Effective management across each area with coherence and understanding on the linkages between the ecosystems should result in positive ecological benefits within and between sites. The Páirc could become a

coherent network of protected areas for nature, helping to increase biodiversity in surrounding areas and improving ecosystem services.

Other challenges will include ensuring there is greater transparency in how the Páirc is managed and monitored. New online systems will need to be developed to ensure the public can easily access crucial information on management and to ensure money and resources are being spent correctly to manage, protect and restore nature. Effective monitoring of the marine space is drastically needed, which so far has been a challenge due to resourcing.

NPWS will need to be strengthened and their capacity increased to ensure there are enough resources and people power to manage not only this National Park but all National Parks and protected sites across the island. Managing this Páirc successfully across terrestrial, marine and freshwater habitats, could result in it becoming a blueprint for how we implement the ecosystem approach in all future conservation actions.

Thank you for taking the time to consider our observations.

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1. https://www.npws.ie/sites/default/files/publications/pdf/002263_Kerry%20Head%20Shoal%20SAC%20Marine%20Supporting%20Doc_V1.pdf
2. https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf