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August 5th 2025 Re: Consultation on the Marine Planning Policy Statement

The Irish Wildlife Trust welcomes the opportunity to submit to the public consultation on the Government's Marine Planning Policy Statement. We welcome the plan led approach which is mentioned in the principles of marine planning. Using a plan led approach with effective stakeholder engagement is vital to ensure Ireland has a chance at achieving their legal requirements under several national and EU laws. Stakeholder engagement must be early, ongoing and the opinions of civil society and experts should be incorporated into any planning policy statements. Without a healthy and resilient marine environment, other aspects of marine planning will be negatively impacted. Sustainable fisheries cannot exist without a marine environment that is respected and legally protected, restored and monitored to ensure the non deterioration of the habitats and species. Unfortunately, biodiversity is only mentioned twice in the document and reference to restoration is made only three times. Protection in reference to the environment is also only mentioned twice. This fails to show the understanding that without a healthy environment, other maritime industries will be affected.

Several EU laws are mentioned in the document such as the Birds and Habitats Directive and the Water Framework Directive. However, one of the latest environmental laws to come from the EU, The Nature Restoration Law has not been mentioned once. We believe that this is a major omission within the policy statement. The Nature Restoration Law has legally binding targets for Member States to restore degraded marine ecosystems in their waters. It also has legally binding targets to ensure the non



deterioration of these areas once restoration measures have been put in place. Another important component of the law is that Member States must not only restore what is currently degraded back to good environment condition, but also reestablish areas of habitats that have been historically lost to their favourable reference area. This is to ensure that the habitat has a large enough area to support the species that rely on it, remain resilient in the face of a changing climate and be able to provide its specific ecosystem services. Habitats included within the law are listed below alongside their related habitat type code as referred to in Annex I to Directive 92/43/EEC.

Group 1: Seagrass beds - 1110, 1140, 1150, 1160

Group 2: Macroalgae forests - 1130, 1160, 1170

Group 3: Shellfish beds - 1130, 1140, 1160, 1170

Group 4: Maerl beds - 1110, 1160

Group 5: Sponge, coral and coralligenous beds - 1130, 1170, 8330

Group 6: Vents and seeps - 1130, 1160 1170 1180

Group 7: Soft sediments (not deeper than 1 000 metres of depth) 1130 1130 1140 1150 1160

Below are the current status of these habitats from the latest Irish Article 17 report for the Habitats Directive.

1110 - Favourable

1130 - Inadequate

1140 - Inadequate

1150 - Bad

1160 - Bad

1170 - Inadequate

1180 - Favourable

8330 - Favourable

It is clear that Ireland is falling far behind what is legally required in terms of protection of marine habitats, with the majority of habitat groups failing to reach good environmental status. With this in mind, the document should have environmental protection and restoration as a higher priority. Three main priorities are mentioned in the document, Stewardship, Security and Prosperity. Environmental protection is mentioned as a sub heading to one of these priorities.

We welcome the statement that, *'The State will build and expand on work already completed, and work underway, by State agencies and bodies with regard to marine data collection, having specific regard to developing a survey / monitoring programme to*



improve the quality and scope of evidence base in the marine environment. It is now a legal requirement for Member States to collect data on all listed marine ecosystems. The Nature Restoration Law states that, *'Member States shall ensure that the condition is known of the following areas:*

- (a) by 2030, for at least 50 % of the area distributed over all habitat types in groups 1 to 6 listed in Annex II;*
- (b) by 2040, for all areas of the habitat types in groups 1 to 6 listed in Annex II;*
- (c) by 2040, for at least 50 % of the area distributed over all habitat types in group 7 listed in Annex II;*
- (d) by 2050, for all areas of the habitat types in group 7 listed in Annex II.'*

Having these legal targets referenced within the planning policy statement would show a greater ambition to achieve them. Data collection now has a legally binding target as well as a specific timeline and so this needs to be a top priority. Without a clear picture of the state of marine ecosystems, it will be impossible to put measures in place to effectively restore and protect these areas as well as ensure sustainable marine spatial planning.

Marine Protected Areas (MPAs) are mentioned once within the document, while other industries have greater attention and detail within the document. Offshore Renewable Energy (ORE) is specifically mentioned as a key policy priority for Government. While we agree that Ireland must make the switch to renewable energies and eliminate fossil fuels to reach their climate targets, this should not be done at the expense of marine ecosystems. Many marine ecosystems sequester and store carbon and disturbance of these areas could have severe negative impacts in regards to climate change impacts. Research is currently being undertaken in the marine environment by projects such as QUEST to investigate the blue carbon potential of Ireland's marine ecosystems. 'Blue Carbon' is carbon dioxide taken from the atmosphere by marine and coastal ecosystems in a way that can be quantified. This ecosystem service is vital for the reduction of greenhouse gases and reduces the extent of climate change. Areas which provide this ecosystem service should be designated as marine protected areas and not considered for ORE. MPAs must be progressed ahead and alongside ORE designations and a nature first approach should be undertaken. This point has been reiterated many times over the years by The Irish Wildlife Trust, as well as many other organisations. However, we continuously see ORE taking priority over protected area designation in Government statements, policies and documents. We welcome that the Government reiterates its intention to designate 30% of Ireland's waters as MPAs by 2030 in the MPPS. However, 2030 is less than 5 years away and we have less than 10% of Irish waters designated as MPAs. The majority of these areas are missing the necessary site specific management



plans and are not being effectively monitored to ensure they are reaching the necessary level of protection for the species and habitats within them.

The MPPS also fails to mention the EU Biodiversity Strategy target of having 10% of waters designated as strictly protected. Designation of all MPAs (including potential areas for strict protection) should be a bottom up process with early, ongoing and truly informative stakeholder engagement in the process. Stakeholder engagement will take a great deal of time and we worry that without greater ambition to release new MPA legislation and begin the designation process, these time frames will not be met.

We were glad to see that *'the State will also fulfil its obligations under the Birds and Habitats Directives'*. It also mentions that it will *'support the utilisation of adaptive management of marine ecosystems and socio-ecological systems, where ecosystems management policies and actions are followed on an iterative basis by targeted monitoring'*. There is no clarity on what state agency or body will have the responsibility of monitoring. Currently, our Natura2000 sites are not being actively monitored and managed effectively to fulfil our obligations under the Birds and Habitats Directive. In order to effectively manage current and future protected areas at sea, sufficient funding and resources must be allocated to effective monitoring of these areas.

We look forward to seeing further progress with the Marine Planning Policy Statement.

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Grace Carr
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The Irish Wildlife Trust