



Consultation on the development of fisheries management measures for Marine Protected Areas (MPAs) in the Northern Ireland offshore region.

The Irish Wildlife Trust is an environmental NGO in the Republic of Ireland that has been advocating for an ecologically coherent network of MPAs in Irish waters and to have 30% of Irish waters effectively protected by 2030. In order to have an ecologically coherent network of MPAs throughout Irish waters, protected areas in the Republic and the North must be effectively managed to reach their conservation objectives. MPAs deliver greater benefits to nature and society as a cohesive network rather than in isolation and therefore in order to restore the health of the marine environment around the island, all MPAs must be effectively managed. We hope that the Governments in the North and South of Ireland start working together more efficiently in order to achieve this goal. Environmental organisations have been coordinating cross border efforts to protect the marine environment and we would like to also support the recommendations highlighted in the Northern Ireland Marine Task Force's submission to this consultation.

The latest assessments from the Joint Nature Conservation Committee (JNCC) state that the majority of features within the offshore network of MPAs in Northern Ireland are in unfavorable condition and the UK Marine Strategy and Habitats Regulations have identified that benthic habitats are not achieving the required environmental status. Bottom contact fishing gears have been acknowledged as one of the main pressures to features such as reefs. All three protected areas in the consultation, Queenie's corner Marine Conservation Zone (MCZ), Pisces Reef Complex Special Area of Conservation (SAC) and South Rigg MCZ, contain a majority of priority marine features in 'unfavourable' condition for 2025. Conservation advice for operations for Queenies Corner MCZ states that there is a medium-high risk from fishing pressure such as demersal trawling. For Pisces Reef Complex SAC and South Rigg MCZ, there is a significant risk of not achieving the conservation objectives if mobile bottom contact gears are not managed and advises that *'all mobile bottom contact gears would need to be removed...within the site and from an appropriate distance'* from the Pisces Reef Complex SAC and from only within the site for South Rigg MCZ.



Questions relating to Pisces Reef Complex SAC are summarised below:

1.1. Do you agree with the recommended option of a full closure?

Yes, we agree with the recommended full closure to this site. We would also like to state that no other industrial activity that would impact the seabed, for example offshore renewable energy developments (ORE) or sub sea cables, should be permitted in these areas.

1.2. Do you agree with the assessment of the current value of fishing within Pisces Reef Complex SAC?

We do not have the expertise in this area to comment. We trust that DAERA and any other responsible authority has documented the current value appropriately. We encourage the early, ongoing and transparent engagement with the fishing industry and the Government throughout this process.

1.3. Is there any further evidence that should be considered in terms of values, costs or benefits?

The Pisces reef complex contains reef habitats in unfavourable condition and there is a low to medium level of fishing occurring here. The designated reef features have a moderate to high sensitivity to demersal mobile fishing gear and therefore there is a moderate to high level of risk. It is clear that allowing mobile bottom contact gear in these areas goes against the conservation objectives of the site and there should be a full closure applied. The ecosystem benefits which a total closure will bring far outweighs the economic cost of a closure as detailed in the consultation document. Fishing communities should also be supported in a just transition to more sustainable fishing practices.

The Northwest Irish Sea ISRA (Important Shark and Ray Area) encompasses the Pisces reef complex (1). Within this area there are threatened species and important reproductive areas for species such as the vulnerable Spiny Dogfish *Squalus acanthias*. Early life stages of this species are witnessed here year on year in comparably higher numbers than in adjacent areas (ICES 2025). The Northern Irish Groundfish Survey (2010 - 2024) shows high catches of neonate and young



of the year spiny dogfish in this ISRA and the surrounding area. 739 were caught in and around this ISRA with 99% (731) caught within the area, highlighting how vitally important this area is for juvenile spiny dogfish sharks. The area is also designated for the critically endangered tope shark. Governments are legally obliged under international law to protect critically endangered species in their jurisdiction. A full closure will be in line with the draft NI Elasmobranch Conservation Strategy.

It has also been documented that *Diphasia alata* hydroid communities can be found in this area. This is exceedingly rare as this community is not listed in the Marine Habitat Classification for Britain and Ireland (2). Due to the rarity of this, full restriction to any activity which could impact these communities should be enforced.

Questions relating to South Rigg MCZ are summarised below:

1.4. Do you agree with the recommended option of a full closure? If not, what is your preferred option?

We agree with the recommended option of a full closure to bottom contact fishing gear in this area. We would also like to state that no other industrial activity that would impact the seabed, for example offshore renewable energy developments (ORE) or sub sea cables, should be permitted in these areas.

1.5. Do you agree with the assessment of the current value of fishing within South Rigg MCZ?

We do not have the expertise in this area to comment. We trust that DAERA and any other responsible authority has documented the current value appropriately. We encourage the early, ongoing and transparent engagement with the fishing industry throughout this process.

1.6. Is there any further evidence that should be considered in terms of values, costs or benefits?



The South Rigg MCZ has moderate energy circalittoral rock, subtidal coarse sediment, subtidal sand, subtidal mud, subtidal mixed sediment, sea-pen and burrowing megafauna communities designated as features within it. Subtidal coarse sediment, subtidal sand, subtidal mud and sea-pen and burrowing megafauna communities are all in unfavourable condition with subtidal mixed sediment and moderate energy circalittoral rock in favourable condition. All four features in unfavourable condition are highly sensitive to bottom contact gear and are at high risk. The other two features in favourable condition are also moderately at risk from demersal contact gear due to sensitivity to pressures. There is also an overlap with the South Rigg MCZ and an ISRA in the Irish sea which meets the criteria for vulnerability and reproductive areas. The ISRA is designated for the spiny dogfish and tope and therefore our points made under the section looking at the Pisces Reef Complex in regards to the ISRA are relevant in this case as well. While this area (particularly the south portion) is valuable to fishing it is still considered that value lost is low in comparison to the ecosystem benefits a total closure will bring. Again we agree with the recommended option of a full closure. Fishing communities should also be supported if they are impacted by management measures which are essential for achieving good environmental status. The option for a partial closure allowing bottom contact fishing in 33% of the protected area is not based on a robust scientific methodology. This number has been taken in response to Scottish Government proposals for some MPAs and doesn't take into account the site specifics of this particular area.

It has been shown globally that having effectively managed strictly protected areas results in the 'spillover' effect where greater numbers of fish can be found in the areas surrounding the protected area. This results in a higher catch per unit effort for the fishing industry as well as a healthier marine environment (3,4).

Questions relating to Queenie Corner MCZ are summarised below:

6.1. Do you agree with the recommended option of a full closure? If not, what is your preferred option?

Yes we agree with a full closure in this area due to the sensitivity of the habitats and species found there.



6.2. Do you agree with the assessment of the current value of fishing within Queenie Corner MCZ?

We do not have the expertise in this area to comment. We trust that DAERA and any other responsible authority has documented the current value appropriately. We encourage the early, ongoing and transparent engagement with the fishing industry throughout this process.

6.3. Is there any further evidence that should be considered in terms of values, costs or benefits?

Queenies Corner MCZ has subtidal mud and sea pen and mud borrowing megafauna communities as its qualifying features, both of which are identified as being in unfavourable status. These features are highly sensitive to bottom contact fishing gear resulting in a high level of risk and there is a medium level of this activity taking place in the area. Again, value lost is considered to be low in comparison to the ecosystem benefits a total closure will bring. This area is also adjacent to the Irish Sea ISRA and the same points documented for the Pisces Reef Complex and South Riggs are relevant for this area. Queenies corner is adjacent to fishing grounds for nephrops in the Republic. In order to ensure the best outcomes environmentally and economically, conservation management measures should be undertaken on both sides of the border. We recommend that the responsible departments in the North collaborate with those in the South to ensure cohesive management across this ecosystem.

In order to reach the conservation objectives of the site, it is clear that bottom contact fishing gear is a barrier to that. Therefore to adhere to national, European and International law, demersal towed gear should be removed from these areas. This should be done with ongoing engagement and agreements with the fishing industry. Displacement of these fisheries to other areas must also be taken into consideration, as damage to other benthic communities in the Irish sea must also be avoided. There should be engagement with the fishing industry and an agreement arrived at which will ensure the protection of marine ecosystems, that displacement of fisheries won't impact other areas and that the industry can continue to make a sustainable living. Continued engagement through organisations such as Co-Fish should continue. The fishing industry could also be



engaged and involved in the management of certain areas and these alternatives to bottom contact fishing could be explored alongside government departments, researchers and experts in civil society.

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1. <https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2EuropeanAtlantic/Northwest-Irish-Sea-2EuropeanAtlantic.pdf>
2. <https://jncc.gov.uk/our-work/pisces-reef-complex-mpa/>
3. https://www.researchgate.net/publication/383080299_Fully_protected_Marine_Protected_Areas_do_not_displace_fisheries
4. <https://scientiamarina.revistas.csic.es/index.php/scientiamarina/article/view/5526/3016>