



Consultation on Ireland's Marine Strategy Part 2: Monitoring Programmes (Article 11) under the EU Marine Strategy Framework Directive

21/9/2026

The IWT sits on the steering committee for the MSFD and we are happy for the opportunity to meet with the Department throughout the year and to engage on issues surrounding the MSFD. The consultation for the update to Ireland's Marine Strategy Part II: Monitoring Programme (Article 11) is a welcome opportunity to ensure we are progressing towards addressing knowledge gaps within Ireland's marine space and improving the monitoring strategies so we can achieve Good Environmental Status (GES) in more criteria and descriptors. We appreciate the ongoing work being done to address these issues and would like to highlight some areas within the report that could have additional measures included.

Fisheries

In regards to descriptor 1 biodiversity and fish populations we would like to highlight our concern around the work and engagement of the Department of Agriculture and the Marine (DAFM). In the draft National Restoration Plan (NRP) which was submitted by September 1st to the European Commission, measures to address pressures from fishing activity were not adequately included. No new measures were included in the plan, only a list of current measures which have so far not been effective in protecting the marine environment or improving fish populations. Through an Access to Information on the environment request we are also aware that there has been no communication between DAFM and those responsible for the MPA Life project. The MPA life project was the main programme listed in the NRP for addressing marine restoration issues (which is highly connected to the goals of the MSFD) and yet the Department responsible for the main pressure on marine ecosystems has not engaged. Page 10 of the consultation document states that 'The most significant pressure on biodiversity in Ireland's marine environment is the extraction of fish and shellfish (both commercial and non-commercial) and related incidental bycatch.' It also states that, 'Apart from coastal stocks (occurring within six nautical miles from shore), almost all stocks in Ireland's maritime area are exploited by both national and European fishing fleets.' In the draft NRP, no plans were detailed on whether Ireland was going to submit a Joint



Recommendation (JR) through the Common Fisheries Policy (CFP) to conserve offshore ecosystems. This is the only mechanism available to Ireland to enact protective measures past 12 nautical miles and yet the Government Departments responsible are continuing to fail to address this. JRs are going to be a vital tool in achieving GES in the MSFD for many descriptors and criteria.

On page 38 it says that work is underway to implement the EU Marine Action Plan. One aim of this plan is to eliminate bottom contact fishing gear in MPAs by 2030. We are not aware of work that is being done to achieve this goal and we would greatly appreciate extra information on the measures being taken to achieve this target. Fisheries Natura Declarations in Ireland's inshore area are few and far between and less than 5 of these are restricting bottom contacting gear in Natura sites (these also only cover a very small percentage of the area). Plans to restrict destructive fishing methods such as bottom contact gear were also not detailed in the National Restoration Plan.

The EU Fisheries Control Regulation has targets for certain vessels to have CCTV monitoring on board vessels to help ensure compliance with the landing obligation and to improve monitoring. It would be useful to have information on the progress of this monitoring obligation as it ties in with many criterias in the MSFD. There are targets for 2027 and 2028 and it will take time and effort to ensure the correct technology is installed on the correct vessels.

The majority of fish species assessed have not achieved GES. We would like to add that fish species within the Nature Restoration Law should be included in the MSFD monitoring and assessment programmes. It was noted that spurdog did not reach GES. We hope to see spurdog included in the Atlantic sensitivity analysis which is being undertaken by the Department to help determine areas for protection. This species is vulnerable to overfishing and we believe that the fishery was opened prematurely and the life history traits of this fish were not sufficiently taken into account. Monitoring plans for sprat were not documented in the report even though GES is still unknown. This non quota species has been indiscriminately fished for many years in Irish waters and is a foundational block of marine food webs. There has been much debate on the topic of fishing for sprat and many different groups of stakeholders have called for an assessment of the population status of this species. We strongly urge for these specific assessments to be progressed without delay.



Seabed

'Loss of seabed due to human activities remains very low at 0.6%' and GES was achieved for 74% of Ireland's seafloor with 40% of the seafloor disturbed to varying degrees due to fishing pressure. Through recent conversations with officials who work on the Article 17 reporting for the Habitats Directive, we were informed that vessels under 12m were not included in any analysis as they are not required to have Vessel Monitoring Systems (VMS) on board. There are many vessels under 12m which undergo dredging and forms of bottom trawling in Irish territorial waters. Since these vessels are not included in the analysis of pressures on the marine environment for the Article 17 report, we are concerned that the actual percentage of seafloor that is disturbed is a great deal higher than what is reported. There are greater monitoring requirements coming in the next couple of years through the EU Fisheries Control Regulation and we highly recommend all Government departments making it a priority to effectively monitor small scale vessels in the marine environment. This is vital if we are to truly know the status of marine ecosystems, as well as knowing important fishing areas for small scale vessels so that accurate socio economic analysis can be undertaken. Engagement with these communities is a critical step in designating MPAs and areas for restoration and resources must be put in place to allow a transition away from damaging fishing methods. Officials responsible for the protection and restoration of ecosystems should advocate for funds in the annual budget to be ringfenced for such issues.

Aside from the fishing industry, offshore renewable energy (ORE) developments will be quickly rolled out in Irish waters over the next few years. This is going to have dramatic impacts on the seabed (as well as hydromorphological conditions). The amount of seabed lost as well as the amount adversely impacted will increase. With that in mind, it is important that all seafloor pressures are monitored more closely and more mitigation efforts put in place ahead of the future ORE developments. We should try to recover and restore parts of the seabed already damaged and remove the pressures that are impacting it.

Protected areas

The target of having 10% of Irish waters designated as strictly protected areas was not mentioned. It has been shown globally that having well managed strict protected areas is the best way to restore degraded ecosystems and allow fish populations to recover, which in turn supports the fishing industry as these populations spill over into other fishing areas. We noted that passive restoration was mentioned throughout the document and there are goals to 'actively or passively restore two thirds of benthic broad habitat types that are not in good condition by 2040' and to 'actively or passively restore



30% of the other benthic habitat types that are not in good environmental status' by 2030. Passive restoration involves the removal of pressures and we hope to see continued engagement with stakeholders over where these passive restoration areas need to be to ensure the greatest benefit to the overall ecosystems. We welcome the statement, 'By 2030, ensure that Ireland's marine Natura 2000 sites designated for listed species under the EU Birds and Habitats Directives have a system of management measures developed and in place, in order to ensure that the species' habitat extent and condition at all sites achieve and maintain a favourable status'. We also ask that all new MPAs designated under the new MPA amendment Bill have management measures put in place alongside the designations with no delays.

Climate change

Fair Seas commissioned a report looking at the impacts of climate change and modelling potential future impacts and where best to establish protected areas that are climate refuge areas. This report is available [here](https://fairseas.ie/wp-content/uploads/2024/03/FS_climate_report_V4.pdf) and will offer useful insights into where we need to focus conservation attention (1) .

1. https://fairseas.ie/wp-content/uploads/2024/03/FS_climate_report_V4.pdf

Funding

On page 14 additional assessment considerations included 'funding mechanism for proposed monitoring programmes, or cost estimate if funding is not available'. We are glad to see this addition as without sufficient funding Ireland will not meet its legal requirements under national, European and international law. The Government has yet to announce ring fenced funding for nature restoration under the Nature Restoration Regulation which is extremely worrying.

On page 119 in table 11 it states that 3-5% of funding from DAFM goes to the marine. This number is incredibly low for the Department that is solely responsible for the management of fisheries in Irish waters. Ireland's marine space is nearly 10 times larger than its land mass and the Department of Marine should be spending a significant amount of its budget in ensuring the sustainable use and protection of this space. It is also quite concerning that it is unknown for other Departments how much of their budget is going to the marine. DHLGH has responsibility for Natura sites including those at sea and DCEE has responsibility for renewable energy and more recently the MPA Bill



(which came around after the time period shown in the table) and yet the percentage these departments spend on the marine space is not documented.

Invasive Species

There is only one criteria for GES in the invasive species section which is the number of newly introduced species. We are glad that this number has declined since the last reporting period however, this does not show the full picture for invasive species in Ireland's marine space. We are disappointed that calls for extra criteria on the existing invasives have not been included. It is imperative that new monitoring for invasives which are already here is established. Invasive seaweed species such as *Sargassum muticum* have been spreading throughout the marine environment. Organisations such as Coastwatch have been collecting citizen science data on this species as well as the numerous other invasive species spreading in Ireland's marine space. These species can overpower native species and have huge negative impacts on sensitive species such as seagrass. Ireland has a legal obligation to restore and establish seagrass that has been lost under the Nature Restoration Regulation and without addressing the issue of invasives this will be hard to achieve.

Thank you for your time and consideration of our submission.

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