

*The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF Northern Ireland, National Trust, Friends of the Earth, Irish Whale and Dolphin Group, and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.*

Dear Sir/Madam,

The NIMTF welcome the opportunity to comment on the proposed third tranche of Marine Conservation Zones (MCZs) for England. We have been engaging on the development of the ecologically coherent network of marine protected areas both within Northern Ireland's seas and also within the wider Irish Sea area and UK waters. For the context of this consultation response, NIMTF would like to comment on specific proposals for designations within the Irish Sea region.

### Queenie Corner

*Q.1. Do you agree that this site and specified features should be designated? Please explain and provide evidence to support your views.*

The Northern Ireland Marine Task Force (NIMTF) agrees that Queenie Corner and the specified features (Subtidal mud and Sea-pen burrowing megafauna communities) should be designated as a Marine Conservation Zone (MCZ). The designation of Queenie Corner as a MCZ will advance the UK's progress on reaching ENG and OSPAR protection targets; however, for critical Subtidal mud sites in the Irish Sea, the designation of Queenie Corner will still fail to reach the CP2 region OSPAR target of 15-30%. The NIMTF are therefore calling for the inclusion of the previously recommended (*by stakeholders*) designation of Slieve Na Griddle and Mud Hole as MCZ's for protecting Subtidal mud habitats in the Irish Sea.

In the absence of adequate protection for Subtidal mud sites within this consultation, the NIMTF considers that collaboration between Defra and DAERA to designate Subtidal mud sites within Northern Irish inshore waters and secretary of state waters is urgently needed.

The NIMTF wishes to express concern that Queenie Corner has been presented as a potential alternative to other Sea mud sites in the Irish Sea. The NIMTF calls for the designation of all proposed Sea mud sites in the Irish Sea (South Rigg, Slieve Na Griddle, Queenie Corner and Mud Hole). During initial stakeholder workshops, a 26km gap between Slieve Na Griddle and South Rigg was reached as a 'compromise' between covering the broad-scale habitat type, subtidal mud, whilst minimising the loss of fishing grounds to Northern Irish trawlers. This gap was deliberately sought by fisheries stakeholders so that fishing could continue between the two sites. This was felt to be more beneficial to the fishing industry rather than designating one large site<sup>1</sup>.

---

<sup>1</sup> Irish Sea Conservation Zone (2011). Final recommendations for Marine Conservation Zones in the Irish Sea.

If Queenie Corner is designated over South Rigg (and Slieve Na Griddle), there will be a noticeable imbalance between shallow coastal waters and deeper shelf areas. Within Queenie Corner there is only 19km<sup>2</sup> of Subtidal mud at depths *deeper than 75m* - this is in contrast to 53km<sup>2</sup> in Slieve Na Griddle and approximately 70km<sup>2</sup> in South Rigg.

The NIMTF considers that the appropriate management approach for Queenie Corner is scenario 2<sup>2</sup>: *'Closure of entire MCZ to bottom trawling and dredges'*. Bottom impacting activities (such as dredging and bottom trawling) result in a decline on Sea-pen and burrowing megafauna communities<sup>3</sup>. Several studies on the sensitivity of Sea-pen burrowing megafauna habitats reviewed by Hughes (1998), and summarised in: ([https://qsr2010.ospar.org/media/assessments/Species/P00481\\_Seapen\\_and\\_burrowing\\_megafauna.pdf](https://qsr2010.ospar.org/media/assessments/Species/P00481_Seapen_and_burrowing_megafauna.pdf)) have illustrated the effects of mechanical damage (such as bottom trawling) on megafaunal species such as sea-pens. Sea-pen burrowing megafauna communities are of significant ecological importance and thus the NIMTF considers that Queenie Corner should be adequately protected from activities proven to be detrimental to their survival and abundance. Sea-pen burrowing megafauna are recognised as an important feature due to its high biodiversity and significance to the Ecosystem Based Fisheries Management (EBFM)<sup>4</sup>, thus the feature is of importance to a range of stakeholders. In order to achieve the Impact Assessment Management Scenario *'Recover to favourable condition'* the NIMTF concludes that the appropriate management approach is scenario 2: *'Closure of entire MCZ to bottom trawling and dredges'*.

*Q.2. Should any changes be made to the boundary of the site? If so what changes would you propose? Please explain and provide evidence to support your views and proposal.*

N/A

*Q.3. Is there any additional evidence to improve the scientific data certainty for features within this site? If yes, please provide evidence using the data submission form.*

N/A

*Q.4. Are there any additional activities (that may impact on proposed features) occurring within this site that have not been captured within the Impact Assessment and site factsheets? Please provide evidence to support your views.*

None at present, however as part of the site monitoring, evaluating and reviewing, if any new bottom impacting activities occur within the area these should be evaluated accordingly.

---

<sup>2</sup>[https://consult.defra.gov.uk/marine/consultation-on-the-third-tranche-of-marine-conser/supporting\\_documents/Impact%20Assessment%20Annex%20A%20Management%20Scenarios.pdf](https://consult.defra.gov.uk/marine/consultation-on-the-third-tranche-of-marine-conser/supporting_documents/Impact%20Assessment%20Annex%20A%20Management%20Scenarios.pdf)

<sup>3</sup><http://jncc.defra.gov.uk/page-6028>

<sup>4</sup>[https://qsr2010.ospar.org/media/assessments/Species/P00481\\_Seapen\\_and\\_burrowing\\_megafauna.pdf](https://qsr2010.ospar.org/media/assessments/Species/P00481_Seapen_and_burrowing_megafauna.pdf)

Q.5. Do you have any new information on costs to industry not covered in the Impact Assessment and that would be directly attributable to these MCZs, as opposed to costs stemming from existing regulatory requirements? If yes, please provide evidence.

N/A

Q.6. Do you have any new information on the monetised or quantified benefits of designation? If yes please provide evidence.

Please see response for Q.10.

### South Rigg

Q.1. Do you agree that this site and specified features should be designated? Please explain and provide evidence to support your views.

The NIMTF agree that South Rigg and the specified features (Moderate energy circalittoral rock, Subtidal coarse sediment, Subtidal sand, Subtidal mixed sediments, Subtidal mud, Sea-pen & burrowing megafauna communities) should be designated as a MCZ. The array of features and habitats included in this proposed MCZ designation make it of upmost ecological importance to the Irish Sea and wider UK MPA network. The NIMTF considers that the designation of the South Rigg MCZ will allow for progress to be made in advancing towards the coherent network of biogeographic MPAs and the UK's international obligations to marine protection.

The NIMTF wishes to reiterate its previous answer to Q.1. for Queenie Corner, regarding the designation and targets for protection of Sub tidal mud sites. Despite the designation of Queenie Corner, South Rigg, Slieve Na Griddle and Mud hole sites, the level of protection for Subtidal mud sites in the Irish Sea would still fall short of the 15% representation target set out in the Ecological Network Guidance (ENG) project and the 20% OSPAR target. Again, we wish to call for collaboration between Defra and DAERA to designate more areas of Subtidal mud sites as MCZs in Northern Irish inshore waters and secretary of state waters.

Similarly, the NIMTF would like to reiterate our earlier comment about the potential for Queenie Corner to be used as a substitute site in place of South Rigg and Slieve Na Griddle. The NIMTF considers the designation of *all* proposed Subtidal mud sites as critical to advancing a coherent biogeographic MPA network.

It is disappointing that the feature Ocean Quahog has been removed as a proposed protected feature for the South Rigg MCZ. While we recognise the data limits afforded to the lack/gaps in monitoring of certain species, the NIMTF would like to see the precautionary approach utilised in such circumstances. The Ocean Quahog occurs in the subtidal sand area of South Rigg MCZ (Butler, 2009). Live juveniles have been recorded in the area which is an indication of a breeding population (Irish Sea Conservation Zone, 2011 pg. 148). Ocean Quahog is a valuable species for paleoclimatic research and as an indicator of environmental conditions. Although more recent studies are lacking, the use of a precautionary approach should be employed until a decision to exclude a recorded feature is taken. The implementation of Marine Ecosystem Based Management (MEBM) is crucial for the protection and

sustainable use of our marine environment; excluding the principles of MEBM (such as the precautionary approach) will ultimately duplicate future efforts to progress towards MEBM and bear a negative impact on our marine environment.

The NIMTF agrees with the site assessments<sup>5</sup> carried out by JNCC which afford a high current/and or future risk rating due to the South Rigg's features sensitivity and vulnerability to anthropogenic activities. South Rigg has been identified as an important habitat for the wider functioning of the ecosystem and is an important area for foraging sea birds such as; guillemots, gannets, manx shearwaters and puffins (Irish Sea Conservation Zones, 2011 pg. 149). The designation of South Rigg MCZ will provide both direct and indirect benefits to species such as those noted above<sup>6</sup>. Given South Rigg's critical value to the wider health and functioning of the ecosystem, and the vulnerability of certain designated features to bottom impacting methods and static gears, the NIMTF recommend that the precautionary approach is applied to this site and that management scenario 3<sup>7</sup> is applied: '*Closure of entire MCZ to bottom trawls, dredges, pots and traps and hooks and lines*'.

*Q.2. Should any changes be made to the boundary of the site? If so what changes would you propose? Please explain and provide evidence to support your views and proposal.*

The 3km<sup>2</sup> reduction<sup>8</sup> of the proposed MCZ site at South Rigg is disappointing. As previously mentioned, even with the designation of South Rigg, Queenie Corner, Slieve Na Griddle and Mud hole as MCZ sites, the UK will still fall short of its ENG 15% representation target (minimum) and the 20% OSPAR recommendation. The reduction of the South Rigg MCZ by 3km<sup>2</sup> further inhibits an adequate and acceptable level of protection for Subtidal mud sites in the Irish Sea.

*Q.3. Is there any additional evidence to improve the scientific data certainty for features within this site? If yes please provide evidence using the data submission form.*

N/A

*Q.4. Are there any additional activities (that may impact on proposed features) occurring within this site that have not been captured within the Impact Assessment and site factsheets? Please provide evidence to support your views.*

N/A

*Q.5. Do you have any new information on costs to industry not covered in the Impact Assessment and that would be directly attributable to these MCZs, as opposed to costs stemming from existing regulatory requirements? If yes, please provide evidence.*

N/A

---

<sup>5</sup>[http://jncc.defra.gov.uk/pdf/jncc\\_mcz3overviewreport\\_v2.0.pdf](http://jncc.defra.gov.uk/pdf/jncc_mcz3overviewreport_v2.0.pdf)

<sup>6</sup> Irish Sea Conservation Zone (2011). Final recommendations for Marine Conservation Zones in the Irish Sea. Page 166.

<sup>7</sup>[https://consult.defra.gov.uk/marine/consultation-on-the-third-tranche-of-marine-conser/supporting\\_documents/Impact%20Assessment%20Annex%20A%20Management%20Scenarios.pdf](https://consult.defra.gov.uk/marine/consultation-on-the-third-tranche-of-marine-conser/supporting_documents/Impact%20Assessment%20Annex%20A%20Management%20Scenarios.pdf)

<sup>8</sup><http://publications.naturalengland.org.uk/file/1732875>

Q.6. Do you have any new information on the monetised or quantified benefits of designation? If yes, please provide evidence.

See response for question 10.

Q.7. Do you agree that the additional features proposed should be added to the existing MCZs? Please explain and provide evidence to support your views as necessary.

Yes, the NIMTF agree that the additional features proposed, should be added to the existing MCZs. However, the NIMTF would also like to express concern that Ocean Quahog has been removed as an additional feature proposed under the South Rigg MCZ. The NIMTF also note the absence of Native Oysters from the Tranche 3 proposed MCZ designations. For replication and a coherent network of MPAs it is important that such features are not only designated through regional MPA processes but that they are also replicated on the biogeographic scale to achieve a representative network for the entire region.

As well as a gap for Native Oysters, there is also a gap in representivity and replication for Skate (*Dipturus batis*) and Sea Cucumber (*Paracucumaria hyndmani*) in the Irish Sea Biogeographic area<sup>9</sup>.

With regards to representivity and replication of sediment in the Irish Sea biogeographic region, there are gaps in sublittoral coarse sediment (6.2%), although this gap would be filled with the designation of the West of Copeland site. Similarly there is a gap of 5.2% for Moderate Energy Circalittoral Rock<sup>10</sup>.

Full information on the representivity and replication criteria at the biogeographic region is found in the JNCC ENC Report for the Northern Ireland inshore region<sup>11</sup>.

Q.8. Is there any additional evidence to improve the scientific data certainty for the recommended additional features within this site?

Please refer to: <https://www.marlin.ac.uk/species/detail/15199>

Q.9. Do you have any new information on costs to industry of these additional features that are not covered in the Impact Assessment? Please note that relevant costs are only those directly attributable to adding these features to the MCZs, as opposed to costs stemming from existing regulatory requirements or stemming from the existence of the MCZs with their current features. If yes, please provide evidence.

N/A

Q.10. You may wish to provide comments on any other aspects of the consultation proposals. Where you disagree with the approach, please provide evidence where possible to support your views.

---

<sup>9</sup><http://jncc.defra.gov.uk/pdf/JNCC%20DAERA%20NIMPA%20Network%20Progress%20v6.0.pdf>

<sup>10</sup><http://jncc.defra.gov.uk/pdf/JNCC%20DAERA%20NIMPA%20Network%20Progress%20v6.0.pdf>

<sup>11</sup><http://jncc.defra.gov.uk/pdf/JNCC%20DAERA%20NIMPA%20Network%20Progress%20v6.0.pdf>

The NIMTF welcomes the opportunity to comment on the sites proposed for designation in the third tranche of Marine Conservation Zones. The NIMTF feels that utilisation of the precautionary approach to designate certain important features such as Ocean Quahog at South Rigg is lacking, for the reasons and evidence previously mentioned. The NIMTF also wishes to reiterate its earlier comment about the potential designation of Queenie Corner instead of other Irish Sea Subtidal mud habitat sites (South Rigg, Slieve Na Griddle and Mud Hole). The NIMTF welcomes the inclusion of Queenie Corner in this consultation but designating this site in place of the other three sites would have significant impacts on the level of protected Subtidal mud habitat and Sea-pen burrowing megafauna communities in the Irish Sea. The other sites have been part of the Regional Stakeholder process, caution should be taken when including alternative options proposed by one stakeholder group following a wider and agreed engagement process to ensure confidence in the weight of stakeholder's opinions.

Lack of data is something that appeared a lot within the JNCC ECN report, the NIMTF considers that there is a crucial need for access to resources to carry out such research. Such resources will be even more crucial following the UK's exit from the European Union.

While the NIMTF recognises that this consultation is for the tranche process of designations, we wish to reiterate that effective enforcement, monitoring and evaluating of existing sites and those designated in tranche 3 is critical to the true protection value of a MPA.

In relation to quantifying the monetary value of designations (alluded to in questions 6 where they occur), the NIMTF commissioned a report published in 2014<sup>12</sup> which assessed the effectiveness of the existing MPA network in Northern Ireland and also aimed to quantify the economic and social benefits of achieving an ecologically coherent network. The report concluded that an ecologically coherent network of Marine Protected Areas for Northern Ireland's seas could be worth £52.83 million in ecosystem services under a 'maintain' management regime and £54.46 million under a 'recover' management regime. Additionally, a comparative analysis found that the net value of Northern Ireland's seas in ecosystem services is estimated at ~£164,000 per km<sup>2</sup>, which is greater than estimates of ~£100,000 per km<sup>2</sup> in England and ~£57,000 per km<sup>2</sup> in Scotland networks. The comparative methodology presented in the study may be useful in the calculation of the monetary value and benefits of an ecologically coherent network of MPAs for England in this context.

Finally, the NIMTF also wish to comment on the meaning of protection and the use of targets; the real protection value in MPA's is the continued monitoring and evaluating of their progress as protected sites. This may become more evident following the UK's exit from the European Union, especially depending on how the UK reports MPA's in the future, such as through the IUCN protected categories. The inclusion of Highly Protected Marine Areas is something that we would welcome

---

<sup>12</sup> Barnard, S., Burdon, D., Strong, J. & Atkins, J. (2014), The ecological coherence and economic & social benefits of the Northern Ireland MPA network. Report to the Northern Ireland Marine Task Force (YBB238-F-2014). Institute of Estuarine and Coastal Studies (IECS), University of Hull, Hull, UK, HU6 7RX.

within secretary of state waters and the Northern Irish inshore region. The NIMTF considers an approach where management measures are representative of the adequacy of protection may be more representative.

## Highly Protected Marine Areas

Highly Protected Marine Areas can boast both direct and indirect ecological benefits (for example, improving scientific research e.g. the use of marine reserves in New Zealand). By limiting the anthropogenic effects acting on areas of our marine environment we can in turn learn more about the area thus improving processes such as MCZ designations and marine spatial planning. The IUCN encourages IUCN state members to designate and implement at least 30% of each marine habitat in a network of highly protected MPAs, with the aim of creating a fully sustainable ocean, at least 30% of which has no extractive activities<sup>13</sup>. The NIMTF considers and understands that there are additional costs to the designation, monitoring and enforcement of HPMA's, however we would recommend that the establishment of HMPA's is carried out with the complete biogeographic network in mind. By doing so, the benefits of HMPA's would be felt throughout the network and not just at a specific site level where the costs may outweigh the benefits. Effective marine protection requires a suite of tools including the use of HPMA's, where the impacts of human use are reduced to the lowest possible level. The benefits of designating HPMA's and indeed MCZ's should focus on more than just conservation. Protection of our marine environment creates a sense of stewardship and sets the precedent for future governance of our marine environment. Early and effective engagement with stakeholders can assist in overcoming perceived challenges about designating HPMA's. Given the statutory remit for Marine Spatial Planning (MSP) and achieving Good Environmental Status (GES) through the Marine Strategy Framework Directive (MSFD), the NIMTF believes that there is an opportunity for the UK and devolved administrations to become world leaders in marine protection, sustainable use and ocean governance and thus we encourage both DAERA and Defra to further ambitious concepts such as designating HPMA's.

The Northern Ireland Marine Task Force support the wider comments raised in relation to this consultation by some of our member organisations in England, namely the Wildlife Trusts, Marine Conservation Society and the Royal Society for the Protection of Birds.

This response was compiled by the Northern Ireland Marine Task Force Officer Ellen MacMahon and the NIMTF team. If you wish to discuss any of our points raised in more detail, please contact Ellen MacMahon at: [ellen.macmahon@ulsterwildlife.org](mailto:ellen.macmahon@ulsterwildlife.org).

---

<sup>13</sup>[https://portals.iucn.org/library/sites/library/files/resrecfiles/WCC\\_2016\\_RES\\_050\\_EN.pdf](https://portals.iucn.org/library/sites/library/files/resrecfiles/WCC_2016_RES_050_EN.pdf)