



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.

Northern Ireland Marine Task Force response to:

[UK Dolphin and Porpoise Conservation Strategy](#)

Submitted on 14/06/2021

1. Do you support the implementation of the UK Dolphin and Porpoise Conservation Strategy?

Yes/No/Don't know

Please explain your answer

Yes. The Northern Ireland Marine Task Force support the implementation of the UK Dolphin and Porpoise Strategy.

Northern Ireland waters are home to a diverse range of cetacean species, some of which are spotted regularly in our inshore area including harbour porpoise, common dolphin, bottlenose dolphin and minke whale. Therefore, it is encouraging to see among others, these species included within the scope of the strategy.

Many of the pressures and threats to cetaceans from human activities are as impactful in Northern Irish waters, as they are in the rest of the UK. Cetacean populations face conflict with fisheries (either by competition for a common food resource, or accidental capture in fishing gear), habitat degradation, and disturbance (from vessel traffic and underwater noise). In the ELUK response to the **Marine Strategy Part One: UK Updated Assessment and Good Environment Status¹**, NIMTF and others stated how there is *'an incomplete picture of the status and trends of most UK cetacean populations. Baseline monitoring of all cetacean species is currently a big and important data gap.... Monitoring methods need to be broadened to include a wider range of survey types, and all seasons of the year. Resources need to be allocated for adequate monitoring of all BAP priority marine mammals. More robust management measures are required to tackle chemical pollutants at source, fisheries bycatch, noise pollution and disturbance'*

Furthermore, the ELUK response states that *'Cooperation between the Republic of Ireland and the UK must also be improved. Status of coastal bottlenose dolphin and minke whale are both unknown, (with the exception of West Scotland) resulting in a huge data gap for the Celtic Seas region. As such, an assessment of only the UK portion of the Celtic Seas Sub-Region would be misleading because cetaceans are very mobile and wide-ranging. To improve this, we suggest that collaboration between the Republic of Ireland and the UK must be improved'*. Therefore, strategy objectives such as *'identify current management measures and obligations and opportunities for improvement'*, *'prioritise the*

¹ <https://nimtf.files.wordpress.com/2019/06/eluk-uk-marine-strategy-part-one-response.pdf>

management of key pressures that pose the greatest risk to achieving and or maintaining favourable conservation status', 'initiate new actions, where necessary, to maintain or improve conservation status' and 'improve understanding of population status and trends' are welcome.

In the context of ever-increasing demand on our seas and the twin climate and biodiversity crises, the commitment to consider future challenges, risks and potential threats (e.g. UK Government's increased ambition for offshore wind including floating wind technology) to the nine species outlined, is also welcome and an important aspect of the strategy.

In terms of the overarching aim of the strategy to *'ensure effective management to achieve and/or maintain favourable conservation status for eight of the most commonly found dolphin and porpoise species in UK water'* NIMTF are concerned that such high-level targets, even if achieved, in the case of maintain favourable condition will only serve to prevent deterioration, or in the case of achieve favourable condition, will recover species only to a former already depleted baseline. A high-level objective of 'recovery' would ensure the strategy addresses the pitfall phenomenon of 'shifting baselines' in the marine environment.

2. Do you agree that the evidence presented supports the case for the strategy?

Yes/No/Don't know

Please explain your answer

Yes. The Northern Ireland Marine Task Force agree with the evidence presented to support the strategy.

3. Do you have any comments on the vulnerability assessments and the conclusions reached?

No.

4. Do you have any comments on the actions that have been identified in the strategy?

Convening working groups to deal with specific issues facing the cetaceans outlined in the strategy is positive. Ideally, these groups will drive positive action and policy decisions which will benefit cetacean populations in Northern Ireland and UK waters. At the same time however, convening working groups, is not an action in of itself which will benefit whale, dolphin or porpoise populations in our seas. The Northern Ireland Marine Task Force appreciate this is a high-level action plan, but more details on potential outputs, deliverables, or policy options which could be implemented over the immediate, medium and long term for each of the nine action points, would be helpful in ensuring this conservation strategy is effective.

The UK vulnerability scores do not indicate whether or how new renewable energy technologies such as offshore floating wind, pose a threat to the species listed – be it from entanglement, disturbance, loss of habitat or other means. The draft Northern Ireland Energy Strategy² states floating platform offshore wind is likely to represent the best long-term energy offshore renewable option for Northern Ireland due to the geology of our seabed. Therefore, it is important this developing industry is taken into account when considering the health and status of cetacean species in NI waters in the future.

² <https://www.economy-ni.gov.uk/articles/northern-ireland-energy-strategy-2050>

Regarding the action point to 'Further development and implementation of the UK bycatch mitigation initiative', in a recent parliamentary briefing, the Whale and Dolphin Conservation (WDC) charity campaign³ 'Say Goodbye to Bycatch', supported by 21 other environmental NGOs around the UK and Ireland, stated that to meet its Fisheries Act commitment to minimise and where possible eliminate sensitive species bycatch, UK and devolved governments should:

- Set clear, ambitious annual targets to reduce bycatch every year until it is stopped
- Invest in bycatch solutions for the UK fleets, including trials and roll-out of alternative gears, effective technical and spatial solutions on fishing gear and independent at sea monitoring to track progress
- Research commissioned by Whale and Dolphin Conservation (WDC) and Humane Society International (HSI) finds that we can save hundreds of porpoises and dolphins from asphyxiation by replacing gill nets, which have been identified as a particular threat, with alternative gears
- Government should also develop mitigation plans that can be put into action as soon as there is any evidence that bycatch is occurring for all trawl fisheries that may pose a risk, together with adequate independent at sea monitoring
- Government should require modifications for pot and creel gears together with ongoing trials of better management practices

In Northern Ireland, a fully resourced and implemented bycatch monitoring programme should be prioritised so that the extent and scale of the bycatch issue in NI waters can be fully assessed and thereby helping to shape NI specific mitigation measures.

As far as the NIMTF is aware, NI is not represented on the Clean Catch UK working group. Suitable organisations from NI, including eNGOs should be invited to join those discussions to ensure the NI perspective is taken into account when dealing with cetacean bycatch issues at a UK level

Regarding the action point to 'Improve understanding of entanglements and work towards developing strategies to reduce this threat', a recent study by the Scottish Entanglement Alliance⁴ found that the estimates and numbers of whale entanglement incidents in Scottish waters are likely considerably higher than have been previously reported, including to the International Whaling Commission in National Progress reports. Crucially, the authors also state that informal trials of on-call or 'ropeless' gear types in Scotland have gone well to date, and the technologies have been embraced by those fishers employing them. Formalising and expanding these trials, particularly in areas identified as high risk could also reduce entanglement risk in vertical end lines and should be considered with urgency, particularly given the willingness exhibited by fishers to engage in mitigation strategies and research⁵. A similar initiative should be initiated in Northern Ireland given that according to DAERA records, since 2000 there have been 8 recorded standings associated with entanglement in fishing gear in Northern Ireland, and the true number likely to be much higher due to underreporting.

³ <https://uk.whales.org/our-4-goals/prevent-deaths-in-nets/goodbye-bycatch-what-you-need-to-know/>

⁴ <https://www.scottishentanglement.org/downloads/2020-iwc-report-estimates-of-minke-and-humpback-whale-entanglements-in-scotland/> & <https://www.scottishentanglement.org/>

⁵ <http://www.scottishcreelfishermensfederation.co.uk/entanglement.htm>

Regarding actions points four, we welcome the mention of making use of the noise registry as a collation tool for noisy activities which have taken place. However, improvements are required to ensure it is fit for purpose in managing future noisy activities such as capturing noise which is predicted to occur which should be addressed in the 4c section of the action. The risks from cumulative noise impacts are significant if not adequately managed and currently there is no mechanism in place for collating future noise impacts for management. Further gaps exist including, certain noise inputs have no licence condition to submit data to the register. Critically, no noise activity from licenced activities in Northern Ireland has been included to date, therefore it is not a complete assessment of noise in the UK region.

There are currently no mechanisms available to understand ambient levels of noise and again, it is encouraging to see this included as an issue to be addressed in the strategy. Background anthropogenic impulsive or continuous low-frequency noise can adversely affect populations of marine animals.

Regarding action point nine, a well-developed and effective monitoring plan to provide a more robust understanding of the conservation status of UK cetaceans is urgently needed in the UK. While current monitoring programmes go some way in broadening our understanding, they are not sufficient in many cases for example, to adequately assess whether cetaceans have met Good Environmental Status under the Marine Strategy UK framework. A more holistic, ecosystem approach to monitoring is required, with better join up and integration of monitoring.

5. Do you have any comments on the accessibility of the information in the documents?

No