



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 Marine Strategy Part Three: Programme of Measures](#)

Submitted on 26/11/2021

General comments

The Northern Ireland Marine Task Force (NIMTF) welcomes the opportunity to respond to the UK government's consultation on the Marine Strategy Part Three: Programme of Measures. NIMTF have contributed to and support the Environment Links UK (ELUK) response to this consultation. The purpose of this response is to comment on the measures from a Northern Ireland (NI) perspective.

NIMTF is encouraged by the inclusion of measures such as the '*Review of the Fisheries Act (Northern Ireland) 1966*' and '*The Northern Ireland Seabird Conservation Strategy*'. We also note the near conclusion of the MarPAMM project, which will soon deliver regional and two site specific management plans for NI inshore Marine Protected Areas (MPAs). Overall, however, NIMTF does not believe the proposed new measures are sufficient to ensure Good Environmental Status (GES) is achieved across all descriptors by the next reporting round, or ultimately to sufficiently drive the recovery of the marine environment.

We are in the depths of twin biodiversity and climate crises, which severely impact the marine environment. But the marine environment is also home to habitats, species and natural processes that are key in tackling these crises. Therefore, UK Government and devolved nations, including Northern Ireland, must act swiftly to prevent further deterioration of nature at sea.

Strategic and specific measures needed

The current Marine Strategy consultation, itself a framework for delivering positive environmental outcomes, lists other environmental frameworks and strategies as the proposed new measures to bring about GES (e.g., Fisheries Act 2020, Joint Fisheries Statement, UK Dolphin and Porpoise Strategy, National Biodiversity and Environment Strategies). While needed and welcome, these types of measures are not sufficient in detail regarding how, when or whom will deliver the appropriate policy implementation, programmes or new initiatives needed to rectify the identified reasons for which GES is failing. The problematic issues are:

- (i) only proper resourcing and implementation of policy and legislation delivers positive environmental outcomes, not the publishing of (high-level) policy and legislation itself, and



(ii) implementation of new policy and legislation included in the proposed new measures will take a long time, substantially increasing the risk of many descriptors failing to achieve GES by the next reporting round.

Inside and outside MPAs

NIMTF believe the current programme of measures places too much responsibility on the UK MPA network, and it is unclear how the network will deliver GES (e.g., birds, pelagic and benthic habitats, foodwebs, fish) given that the majority of our marine environment is not designated for protection. An increased focus on strategic and specific measures that will benefit wider seas and not just the MPA network is needed.

In Northern Ireland, we greatly welcome progress towards the UK achieving an ecologically coherent network of MPAs, specifically the development of fisheries management options for nine NI inshore MPAs. The drafting of management plans for NI inshore MPAs is also well underway. However, it is worth highlighting that in NI, the condition status of our MPAs and features is not readily accessible. While finalising management plans is an important step towards a healthy, ecologically coherent network, adequate resourcing, plan implementation, and site monitoring and management thereafter are crucial to achieve the desired outcome. Furthermore, **management plans for NI offshore MPAs need to be developed and implemented** (e.g., Queenie Corner MCZ, South Rigg MCZ and Pisces Reef Complex SAC) and in terms of site designation, there are **gaps remaining in the NI MPA network which also need addressing**¹.

Monitoring and resources

Within the Marine Strategy Part One assessment, the extent to which insufficient data led to GES failing to be achieved (or GES unknown) is disappointingly common. NIMTF contributed to and would like to reiterate the 2020 ELUK response to the Marine Strategy Part Two consultation, which called for increased monitoring and baseline surveys to be carried out across many descriptors². Without adequate monitoring and data, we fail to achieve GES, and we risk further species and habitat decline, leading to shifting environmental baselines. This is a well reported phenomenon whereby our reference point for what represents healthy abundances, distributions and ecological functioning is untenably skewed³. A strategic focus on addressing knowledge and data gaps is needed to inform appropriate management and interventions regarding specific descriptors. **This aspect of the Marine Strategy should be officially coordinated between the four nations at a Governmental level to ensure proper resources are allocated to reach the spatial coverage, scale of work and cost-effectiveness needed to deliver GES.**

Marine spatial planning

¹ [Summary of the Northern Ireland Marine Protected Area network assessment. JNCC 2018](#)

² [Marine Strategy Part Two: UK Updated Monitoring Programmes. ELUK response 2020](#)

³ [Pauly, D., 1995. Anecdotes and the shifting baseline syndrome of fisheries. Trends in ecology & evolution, 10\(10\), p.430.](#)



One of the cross-cutting measures proposed as helping the UK achieve GES across descriptors is marine planning. However, there is currently no marine plan in place for Northern Ireland. The NI draft marine plan was first consulted on in 2018, but has not been progressed further. Since then, various national and international demands, priorities and associated targets for our seas and how we wish to use marine space, have evolved (e.g., MPA and biodiversity targets, UK ambitions for expansion of offshore wind & renewables, NI energy strategy, sustainability and climate objectives in the Fisheries Act (2020) and so on). **Therefore, it is imperative that the NI Marine Plan is progressed as soon as practically possible by the Department of Agriculture, Environment and Rural Affairs (DAERA), starting with an appraisal of how the final plan will take account of all the new and emerging issues and priorities mentioned above, including how it will help to contribute to the delivery of GES.**

Overall, the UK Government and devolved nations, including Northern Ireland, need to carefully reconsider the ambition and urgency demonstrated in the currently proposed measures for reaching GES. A successful programme of measures must detail specifically and strategically how and what fully resourced remedial measures will change current environmental status towards Good Environmental Status.

NIMTF proposed new measures

Cetaceans

NIMTF believe the proposed new measures are not sufficient to achieve GES for this descriptor.

Therefore, **a significantly more robust and strategic suite of measures** is needed to address the underlying causes why cetaceans' is failing to meet GES. Critically, **improved cetacean monitoring at a UK wide scale** is required to ensure insufficient data is not a cause for failing to meet criteria targets in the next reporting round.

NIMTF support the implementation of the UK Dolphin and Porpoise Strategy. However, as noted in our response to the consultation⁴, this is a high-level action plan, **more details on potential outputs, deliverables, and policy options over the immediate, medium and long term for each of the nine action points** is critical to ensure this conservation strategy is effective.

In Northern Ireland, **a fully resourced and implemented bycatch monitoring programme** should be prioritised so that the extent and scale of cetacean bycatch in NI waters can be assessed and help 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 e-NGOs, should be invited to join those discussions to ensure the NI perspective is included when dealing with cetacean bycatch issues at a UK level.**

⁴ [Northern Ireland Marine Task Force response to: UK Dolphin and Porpoise Conservation Strategy 2021](#)



A similar initiative to that trialled in Scotland regarding the use of rope-less gear types⁵ should be initiated in Northern Ireland given that according to DAERA records, since 2000, there have been eight recorded standings associated with entanglement in fishing gear in Northern Ireland, and the true number likely to be much higher due to underreporting.

The MPA network should be an effective measure to help protect cetaceans in Northern Ireland, however, management plans for many sites (including the North Channel SAC) are not in place. Coupled with the lack of a fully implemented Marine Plan for Northern Ireland, it remains difficult to make important decisions in relation to sea usage or future planning applications. It is NIMTF’s belief that recent development decisions (e.g., Islandmagee Gas Storage), pose a significant threat to marine features, including harbour porpoise, and therefore represent a significant hurdle to achieving GES for this descriptor. As we move towards a more sustainable energy future, which may include future developments in the sea area, it is vital that all management plans and conservation objectives for protected sites and an effective Marine Plan for Northern Ireland are in place and are actively working to protect and restore the marine environment.

Seals

NIMTF believe the proposed new measures are not sufficient to achieve GES for this descriptor.

New measures must address why GES has not been achieved, as identified by the Marine Strategy itself. Therefore, proactive and strategic actions and legislation are needed at regional and UK levels with associated coordination, funding and governmental support to ensure GES for harbour seals is achieved and maintained for grey seals.

More specifically, **the Cetacean Stranding Investigation Programme (CSIP) must be expanded to all of the UK, including Northern Ireland**, to assist with determining the cause of national regional and local declines. The programme must also include **post mortems of stranded individuals**.

Comprehensive Northern Ireland abundance, distribution and bycatch monitoring are needed, including the rollout of Remote Electronic Monitoring on fishing vessels, which would inform the development of further effective conservation measures for this descriptor, including how to address seal bycatch.

Birds

NIMTF believe the proposed new measures are not sufficient to achieve GES for this descriptor.

While NIMTF greatly welcomes the inclusion of a Northern Ireland Seabird Conservation Strategy as a proposed measure for this descriptor, it must lead to tangible action as soon as possible if GES is to be achieved before the next reporting round. **Given that birds are the only descriptor assessed to be moving away from GES, swift and effective interventions to halt declines are needed. Furthermore,**

⁵ [Estimates of humpback and minke whale entanglements in Scotland](#). See also [Scottish Entanglement Alliance](#)



urgent action to develop, resource, finalise and implement a robust seabird conservation strategy in Northern Ireland is required as soon as possible.

Fish & commercial fish

NIMTF believe the proposed new measures are not sufficient to achieve GES for these descriptors.

The inclusion of overarching Sustainability, Ecosystem and Climate objectives in the Fisheries Act (2020) is encouraging in terms of the future sustainability and productivity of the fishing industry in Northern Ireland and across the UK. However, it remains unclear how such high-level legislation will translate into specific and beneficial action for UK inshore and offshore seabed habitats within the timeframes needed to achieve GES by the next assessment cycle. The Joint Fisheries Statement (JFS) is yet to be published (including associated Fisheries Management Plans), and it is the responsibility of the devolved public authorities to implement policies that will achieve the objectives of the Fisheries Act (2020) in its entirety, rather than for the achievement of GES specifically. Therefore, **specific fisheries management measures directed by the Fisheries Act (2020) principles are urgently needed** to address the already overexploited and depleted status of many fish stocks in the UK.

NIMTF welcome the intention to review the Fisheries Act (Northern Ireland) 1966. However, if it is to help contribute to the condition and health of fish and commercial fish descriptors (and others) before the next reporting round, **the review needs to be progressed within DAERA as a matter of urgency.**

Importantly, the review also needs to culminate in **new NI legislation that enshrines the positive elements of the Fisheries Act (2020)** but also goes further by **including legal obligation to limit catch quotas to sustainable levels.**

Benthic habitats

NIMTF believe the proposed new measures are not sufficient to achieve GES for this descriptor.

Neither the UK wide nor NI specific MPA network can help deliver GES for Marine Strategy descriptors until it is ecologically coherent, well-managed and enforced, and shown to be effective through appropriate monitoring. While NIMTF welcome recent steps to introduce fishery management options in Northern Ireland MPAs, and management plans for all NI MPAs are due in the next 12 months, unfortunately, we are in the dark regarding the current condition and status of our MPAs and features. While finalising management plans is an essential step towards a healthy, ecologically coherent network, **adequate resourcing, plan implementation, and site monitoring and management thereafter are crucial in achieving the desired outcome.** Furthermore, **gaps in the NI MPA network need addressing with new designations⁶.**

The intention to designate Highly protected Marine Areas (HPMAs) as indicated by the UK Government for English waters, and the Scottish Government for Scottish waters, must be extended

⁶ [Summary of the Northern Ireland Marine Protected Area network assessment. JNCC 2018](#)



so that **HPMA designation is coordinated and progressed across all UK waters including Northern Ireland.**

Process questions

i. What, if any, improvements do you think could be made to the process and structure of the existing delivery programme in order to enhance and streamline it?

- The Marine Strategy needs to be empowered to be quicker in responding to pressures, threats, causes of decline, with powers fitting to the scale of the challenge.
- The Marine Strategy should involve a comprehensive impact assessment of the measures, quantifying the expected contribution of measures towards achieving GES over the cycle.
- More aspects of the Marine Strategy process need to be coordinated at a four nations UK level to improve effectiveness, e.g., UK wide monitoring and programmes.
- The Marine Strategy needs to be held accountable, with repercussions for administrations if GES targets continue to be missed.
- **The Marine Strategy targets need to be fully considered in all other relevant policy and legislation**, e.g., marine planning, including the draft NI marine plan, NI energy strategy, NI environment strategy and NI biodiversity strategy among others.

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