

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:

[Consultation on the Outline Strategy for Future Marine and Fisheries Support 2023-2028](#)

Submitted 3rd February 2023

NIMTF thank DAERA for an opportunity to comment on the 'Outline strategy for future marine and fisheries support 2023-2028'.

General comments

A thorough future marine and fisheries funding strategy will be key in guaranteeing marine-related NI legislation and executive strategies meet their objectives, alongside providing support for innovative projects that will result in sustainable activities at sea.

- NIMTF welcome statements within this strategy, such as *'recent increased focus on green growth means enhanced opportunities and potential to invest initiatives where the outcomes positively impact on climate action, net zero, GES, blue carbon, biodiversity, and the eco-system.'* To achieve these aims, it is key that eNGOs are considered as a significant stakeholder and profiled more widely for future MFF funding, as many organizations within the environmental sector have priorities that align strongly with the future direction set out within this draft strategy, and have a track record of partnering with industry/other sectors to deliver environmental outcomes.
- This strategy considers the time period 2023-2028. However, to truly achieve the high-level aims outlined within this document and maintain a sustainable marine environment this strategy should set out the intended long-term direction of funding to influence project development within the NI seascape. It is therefore important that the long-term direction of funding is considered and an overall long-term vision, beyond 2028, is acknowledged within this outline strategy.
- Furthermore, it is key that all proposals outlined within this strategy align with the overall objectives. There is a notable mention of 'growth' and 'expansion' of industry throughout this strategy. For example, proposals supported under Theme 1 include *'Expansion and/or diversification of existing businesses operations'*. These proposals are promoted alongside the

overall vision to achieve sustainable seas. It is important that the contradiction between these two themes is acknowledged. We cannot continue to expand the operations of currently unsustainable fishing practices in NI whilst also recovering already depleted local fish populations. Nature is in crisis, and it is paramount that greater attention is given to the recovery of local species, including commercially valued species, and key marine habitats above expansion and industry growth. Only then will we achieve productive, resilient and healthy seas which in turn will result in environmental, societal and economic benefits for NI.

Question 1) Are all key stakeholder interest groups included in this document or are there any sectors that have been omitted?

ENGOs are currently omitted from **section 2.2 Overview of NI marine & fisheries stakeholders**. As this strategy encompasses the direction of future marine & fisheries proposals, it is key that the role of eNGOs and the support they should be awarded is considered more greatly within this strategy. EMFF funding had previously been awarded to eNGO projects, such as the Marine Hub scoping project.

ENGO expertise and overall priorities align strongly with the future direction described within this draft and can therefore play a key role in collaborating with industry to achieve sustainable, ecosystem-based fisheries. NI eNGOs also currently lead on many of the major themes outlined within this strategy such as blue carbon restoration. For example, NIMTF members Ulster Wildlife commissioned a DAERA funded report into a feasibility study of Blue Carbon Restoration in NI¹. To ensure a wide array of viable and impactful funding initiatives are being considered, eNGO proposals therefore must be championed within this future strategy.

Question 2) Are all the key UK and NI Executive Strategies covered in respect of shaping the future of funding support?

NIMTF welcomes the inclusion of key NI strategies within this outline strategy draft, including the NI Biodiversity strategy and the NI MPA strategy review. It is important to note that the final versions of many strategies outlined in this document are not yet complete. Therefore, flexibility will be required within the future marine & fisheries support strategy to allow for the updating of themes and objectives to align with any final versions of other wider UK & NI executive strategies.

Other strategies that should be considered include species-specific strategies such as the NI seabird conservation strategy and the NI elasmobranch conservation strategy, both currently in development. Impacts such as bycatch or over-extraction of key food sources resulting from certain fishing practices can greatly affect both our local seabird and elasmobranch populations. Therefore, these final species-specific strategies will likely have objectives and targets that require co-operation and action from the fishing and aquaculture industries. To ensure the objectives of both these strategies are achieved it is

¹ <https://www.ulsterwildlife.org/sites/default/files/2021-05/Blue%20Carbon%20Habitat%20Restoration%20in%20Northern%20Ireland%20-%20A%20Feasibility%20Study.pdf>

therefore important proposals offering solutions and capacity for fisheries to address relevant pressures be considered within future MFF funding.

Question 3) Is the vision statement of “Healthy Seas ... Sustainable Fisheries ... Viable Industry” appropriate?

Terms such as healthy and sustainable can be interpreted differently by stakeholders and therefore may risk omitting important aspects such as ecological health and a biodiverse sea from this vision statement. For example, fisheries may interpret sustainable as ensuring fish stocks are maintained at a productive level, whilst eNGOs would describe a sustainable fishery as one managed with an ecosystem-based approach, incorporating the health of the entire marine ecosystem. NIMTF would recommend incorporating terms such as species-rich/ biodiverse seas within this vision statement to reflect an environmental viewpoint.

Additionally, viable and sustainable fisheries could be considered as interchangeable, and may require a change in phrasing.

We would recommend a vision statement such as, **‘Sustainable fisheries in healthy, resilient oceans, supporting life on land and sea.’**

Question 4) Are the proposed high-level aims and objectives for future funding appropriate and are there any missing?

NIMTF welcomes the inclusion of high-level aims that consider the protection and restoration of the marine environment, such as

- *‘Develop an ecologically coherent & well managed MPA network by 2030,*
- *‘Appropriate management, monitoring and control of all activities, including protected species, address marine bio-diversity loss, including Blue Carbon.’*

To truly deliver on these aims it is vital that funding consideration is given to proposed projects from eNGOs and towards further eNGO collaboration. Such organizations carry a level of expertise that will help in the successful implementation of the above aims. Additionally, these high-level aims align with much of the ongoing work being undertaken within the environmental sector. Therefore, greater funding support through the future MFF for eNGOs is necessary to foster innovative partnership projects that will assist the development of sustainable fishing practices, species recovery and the overall delivery of the high-level aims and objectives of this MFF strategy.

It is imperative that all high-level aims align and do not contradict each other. The first aim outlines the need to, *‘Support industry expand, restructure, diversify and develop (subject to any constraints in place) in a sustainable manner.’* Industry expansion implies an increase in size and capacity of fishing activities at sea, which at the current rate will result in continued unsustainable fishing practices that increase pressures on species populations and vulnerable habitats within the marine environment. This consultation does not mention the term ecosystem-based approach. Any future funding provided through this strategy must acknowledge that for all fisheries to be truly sustainable, they must be

managed with an ecosystem approach as outlined in the Joint Fisheries Statement². The first high-level aim of the strategy should therefore acknowledge the requirement of industry to develop an ecosystem-based approach to guarantee true sustainability at seas that will in turn result in a range of economic, societal and health benefits.

Question 5) Are the proposed themes for support appropriate and required? Are there any themes currently omitted?

NIMTF are pleased to see significant consideration given to research and proposals addressing the climate crisis with statements such as, *'focus will be applied through the future MFF (NI) funding strategy to ensure that the potentially available funding makes a significant impact on the key targets associated with "Green Growth" and "Net-Zero" and 'proposals that make a meaningful and positive contribution to marine decarbonisation'*. To achieve this, it will be important to ensure this strategy is a working document, includes flexibility and considers emerging objectives from climate sectoral plans being developed throughout 2023.

However, we do note that besides support for *'Enhancing Selectivity and Reducing By-catches'* and *'Research and collection of baseline data'* there is evidently less of a focus on proposals to target biodiversity loss within each proposed theme. NIMTF would recommend that both climate and biodiversity must be considered on equal footing within this strategy, as the two are inextricably linked, and biodiverse seas provide resilience to climate change impacts.

A great deal of consideration is given to targets associated with Green Growth. The most important aspects of Green Growth in determining its success are its sustainability merits. The 'growth' element of Green Growth highlighted under Pillar 2 is to be encouraged, but not at the expense of nature. Neither should legitimate aims to decarbonise NI come at the expense of marine habitats and wildlife. Therefore, future MFF funding must acknowledge and accept that continuous economic growth is not possible in our local seas when natural resources are finite. Instead, investment in nature and marine restoration must be prioritized. This will bring its own range of economic, societal and health benefits which are themselves important aspects of a thriving, sustainable and green Northern Ireland. Just as on land and agri-environment policy the focus is moving toward 'regenerative' agriculture, we need to consider the same approach for fisheries and aquaculture.

To address this and align with high-level aims such as *'address marine bio-diversity loss'* we recommend the addition under *'Pillar 2: Green Growth & Climate Action'*, an additional theme entitled, *'Ocean recovery'*.

Examples of proposals that may be supported under this theme include:

- Projects that support the application of newly enacted management measures regarding fishing within MPA's. For example, investment in technology on vessels, such as geofencing or similar software that defines geographical boundaries and visualizes on a map MPA boundaries, should

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1119399/Joint_Fisheries_Statement_JFS_2022_Final.pdf

be considered under MFF. Such proposals will also help achieve the high-level aim outlined in this strategy, *'Appropriate management, monitoring and control of all activities, including protected species'* and *'develop a well-managed MPA network by 2030'*. Other relevant projects that require funding includes research to monitor the rates of species and habitat recovery resulting from these newly enacted fisheries management measures, and potential 'spill-over' effects from fisheries management measures that could benefit commercial fish/shellfish species.

- Proposals relating to the objectives of upcoming species-specific strategies, such as the NI seabird conservation strategy and the NI elasmobranch strategy would also fall under this proposed theme.

NIMTF welcome the inclusion of a Blue Carbon specific theme under Pillar 2. Funding that will support research into blue carbon habitats in NI, alongside potential restoration projects will be key to addressing both climate and biodiversity crises. Ulster Wildlife have commissioned a blue carbon habitat restoration feasibility study outlining knowledge gaps relating to blue carbon in NI. Projects that address these knowledge gaps should be prioritized within future MFF strategy.

Finally, to ensure all proposals and incentives funded through MFF are successful in implementation, it is of the utmost importance that all applications display clear, ambitious yet achievable SMART targets that will be regularly monitored to ensure all proposal objectives are met.

Question 6) Do you feel it would be appropriate to deliver the funding programme through a dedicated Grants Support Unit within the Department's Environment, Marine and Fisheries Directorate?

NIMTF feel that if adequate capacity were available, it would be appropriate to deliver funding via a grants support scheme unit within the Department. If further support is required to effectively deliver this funding programme alternative routes that have proven successful, include community-led distribution of funding. In addition, consideration should be given to having an independent 'board' with a range of stakeholder representatives and relevant local experts, perhaps the NI Stakeholder Strategic Steering Group, to review funding applications (possibly those exceeding a certain financial threshold, or projects that have cross-sectoral implications).

Questions 7) Do you foresee any limitations regarding the delivery of the proposed strategy that have not been referred to in the document?

With a large volume of project proposals expected between 2023 and 2028, it may be challenging to deliver this strategy if capacity is insufficient. It is therefore important that the Department and the Environment, Marine and Fisheries Directorate are well resourced and have the adequate capacity required in order to deliver on this strategy.

It may also prove difficult to reflect the wide range of targets and objectives within developing NI executive strategies within this MFF. With several NI executive strategies currently in development, such as the MPA strategy review and a blue carbon action plan, it is important that this future marine &

fisheries funding strategy is a working document. This will allow an update in terminology and proposals outlined within the current themes, dependent on finalized objectives within all other relevant NI executive strategies.

From NIMTF experience, an equal balance is not always achieved between research-based proposals and active ecological management/implementation proposals within funding schemes. Through MFF funding, it is important that an appropriate balance is met between research driven projects and action-based management projects to ensure funding is addressing current knowledge gaps whilst supporting the proactive restoration and enhancement of the natural environment.

Furthermore, to truly achieve the high-level aims of this future marine & fisheries funding strategy it is important to consider the long-term direction of funding. This current iteration prioritizes funding proposals until 2028, however to be truly effective the period of time projects require to meet the high level aims of this strategy, such as *'Make a meaningful and positive contribution to marine decarbonisation'* will exceed this time period. This strategy should clarify on the intended direction of long-term funding or else the high-level aims within this strategy will fail. Looking ahead at the delivery of future funding schemes, it is also important to note that historically project success has been restricted due to the length of time funding is made available per project. Opportunities should be created to fund projects with lengths exceeding three years and make it easier for successful projects to apply and receive funding multiple times, if they are meeting the objectives of this strategy.

Question 8) Is a review/evaluation of the previous Community-led Local Development schemes required to ensure that such funding is targeted towards appropriate stakeholders and geographical regions within Northern Ireland?

Community-led Local Development Schemes, such as SEA FLAG, should be independently evaluated to see whether such models should be utilised under this new Marine and Fisheries Fund, and how these could deliver against the core funding priorities. There have been a number of highly beneficial projects under the previous schemes which are a result of being community-based, and it would seem likely this model could be very beneficial in delivery of outcomes at a local level.

Question 9) Do you feel that a NI Stakeholder Strategic Steering Group is required in order to assist in maximizing the benefits from available funding across all stakeholders?

Yes, NIMTF feel an NI stakeholder strategic steering group, with eNGO representation, is required. Such a group could be used in formally reviewing project/funding applications (for projects meeting certain criteria, such as financial criteria) and ensuring ongoing review of the effectiveness of the funding strategy.

Question 10) Are there any other comments the Department should consider when finalizing its five-year future funding strategy?

Overall, NIMTF are pleased to see reference to environmental conservation within the high-level aims and themes of this strategy. However, given the holistic nature of the marine environment and the biodiversity crisis we are currently experiencing, it is imperative that all proposals considered under this strategy not only consider marine species and habitats but also demonstrate how they will contribute to the protection or enhancement of marine biodiversity within NI seas. It is such proposals that should be prioritized for funding under the MFF.

As some projects may be crosscutting throughout several themes, it will also be important to clarify within this strategy if it is possible to apply for more than one theme per project.

Additionally, it has been noted that proposed levels of financial assistance for representative groups require a 10% cash contribution to demonstrate commitment to proposed investments. We highly recommend that any match funding should include benefit in kind, not only in cash, as not to restrict opportunities for NGOs.

Finally, an area that has continued to be under represented regarding marine conservation is the conservation of fresh water habitats. Within this strategy, under relevant stakeholder's acknowledgement is given to inland fisheries. Similarly, to guarantee the health of our wider seas and address the connectivity between activities on land and at sea, greater attention and consideration should be given to relevant freshwater restoration proposals under MFF funding.

For any further questions please contact Erin McKeown (erin.mckeown@nimtf.org), NIMTF Officer.