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**Sent:** 30 November 2018 18:26

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**Subject:** SW FLAG support of SW RIFF submission on National Marine Planning Framework Baseline Report

A Chara

At a meeting of the FLAG (Fisheries Local Action Group) South West. It was proposed that views, proposals and concerns raised in the submission put forward by the SW RIFF National Marine Planning Framework Baseline Report be support by the SW FLAG. This was unanimously agreed by the SW FLAG.

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**Dr Vera O'Donovan**

FLAG South West Co-ordinator

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## South West Regional Inshore Fisheries Forum

The South West RIFF has approached this submission on National Marine Planning Framework Baseline Report As part of Irelands MSP development process, considering both the consultation questions and generally reviewing the areas of the baseline report where the groups' expertise lies. In general the SW RIFF regards Marine Spatial Planning as a positive and essential planning tool for Ireland's marine resource.

The SW RIFF is aware that the inshore sector is not as visible on paper as the oil/gas industry or other sectors however this should not be regarded as a lack of activity. Continued spatial access is critical as displacement is not an option given the nature and size of vessels in the fleet as we cannot migrate large distance to other areas. A comprehensive baseline of the activity of stakeholders in the inshore sector needs to be established as the initial stage of consultation in the marine planning framework. In the event that a development in the Marine Environment may impact on inshore fishing a consultation framework that has been agreed (and critically, that all stakeholders are familiar with and empowered to engage with) should be used before any permissions are given in the marine planning process.

We need the planning process to recognise economic and social sustainability of our coastal communities and to be considered at every decision point. Out of the suggested themes that might inform the development of strategic objectives we strongly recognise and identify with, and are in support of:

1. Promote the **sustainable development** of a thriving ocean economy.
2. Establish robust **governance**, policy and planning frameworks to enable growth of the ocean economy and the sustainable utilisation of our marine resources, with an emphasis on ensuring effective and meaningful public and stakeholder participation in planning processes.
3. Address **land and sea interactions** and promote integration, coordination and coherence between land and marine planning systems.
4. Promote the development of vibrant, accessible and sustainable **coastal and island communities**.
5. Adopt an **ecosystem-based approach** to marine planning and ensure that the pressure of human activities takes account of the precautionary principle and is kept within or moves towards the levels compatible with the achievement of Good Environmental Status.
6. Help **realise the potential of marine resources** in an integrated fashion and deal with interaction between different interests in a fair, balanced and transparent manner, including those who are employed in the marine sector.
7. Promote the preservation and enjoyment of marine-related **cultural and heritage assets**.
8. Strengthen our **maritime identity** and increase awareness of the value, opportunities and social benefits of engaging with the sea.
10. Contribute towards **climate change mitigation** and adaptation measures.

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### CONSULTATION QUESTIONS

**Question 1** This Baseline Report is intended to capture and summarise development for the marine sector, all of the sectoral activities that are taking place in Ireland's marine spaces. Thinking about your own knowledge and experience, are there gaps in what is presented in this report and, if so, how can they be addressed?

We have addressed these by chapter as they appear in the baseline report, while sometimes specific data is missing, on other occasions we have addressed a deficit in perspective as presented. We see an in-depth understanding of the perspective of the Inshore Sectors' social, economic and environmental requirements as essential in the development of a Marine Spatial Plan.

Chapter 13 Fisheries. It was noted that the reference to landings only accounts for quota species. The Inshore Sector is highly dependent on non-quota species such as lobster, brown crab, Spider crab, whelk, shrimp, razors, cockles, oysters, velvet crab among others which are fished in different combinations depending on regional profile. Omitting this data understates the contribution of inshore fisheries to the coastal economy. This data is available from the SFPA should be included.

The social and cultural significance of other activities is noted however this is not noted for fisheries although there is strong maritime fishing tradition which is at the core of many coastal settlements.

13.4 While the Department of Agriculture Food and Marine landing infrastructure is described, landing points that are not owned by DAFM including those under public/Local Authority and private, ownership are not. The whole array of other infrastructure needs to be taken account of for the economic and social value it contributes to the marine. The inshore sector in particular is mainly dependent on non-DAFM landing infrastructure.

13.6 Inshore vessels are heavily reliant on the zone within the 6NM limit but operations do extend beyond that. Small gillnetters on the south coast operate seasonally up to 50 nm off. Crab potting operations in the SW and S. can be up to 15nm off. This illustrates the diversity of operation of the inshore fleet albeit that they are predominantly and highly dependent on inshore waters.

13.7 For every job employed directly at sea there are a further 3-4 Jobs onshore. Under 12 meter vessels are responsible for 53% of direct employment

13.8 While there is limited access to pelagic stocks, demersal stocks are also accessed and represent a valuable economic contribution.

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13.9 Most inshore stocks are managed nationally apart from Scallop, Edible and spider crab in the BSA which fall under effort control measures such as kilowatt days and *Nephrops* which are a quota species.

3.14 Maintaining a high standard of water quality in inshore areas remains critical to a thriving industry. However this is a far broader cross cutting issue for aquaculture, marine tourism, leisure use and inshore fisheries.

13.16 “The access needs of inshore fisheries are varied due to the diverse nature of stocks which are fished, varying from year-round to seasonal to intermittent. Any developments in other sectors should be cognisant of the ongoing access requirements for these vessels.” Any change to this position needs to be subject to rigorous consultation with industry. In the event of zoning or designation of MPAs these opportunities should be used to protect and underpin the sustainable development of the Inshore sector holistically.

13.17 “While stock management/sustainability is a key ongoing issue which the industry is engaged with in terms of managing outtake from certain fisheries, any changes in behaviour/developments by other stakeholders which have capacity to impact on stocks must consider the potential impact on the optimum conditions for sustaining healthy fish stocks.” This is a critical consideration for the Inshore Sector and we would like to see this thinking retained throughout this process.

#### Under Part 4 Sustainability Issues

Given that this chapter is dealing with fisheries this section is predominantly about environmental and biological sustainability omitting due cognisance of social and economic sustainability which are key drivers of behaviour in the marine space.

For the sector to be sustainable in the future, displacement through limiting access to the marine space has the potential to impact economically and environmentally. This needs to be addressed in any marine spatial planning framework.

13.18 While this points notes all the ad verse impacts of fishing as it relates to environmental and biological processes it does not note that fishing activities can also impact adversely in socioeconomic terms on fishing communities .

13.19 Fishers in co-operation with the state have mitigated interactions and have modified fishing behaviour in reaction to changing requirements.

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15.22 It is essential that MPAs take a wide variety of forms that can provide a pragmatic tool to achieve good environmental status by conferring protection without needless negative impact, on social and economic activities.

15.24 “As well as providing measures to protect the environment, MPAs may also incorporate measures to protect localised social, cultural or economic activities that are deemed important (such as traditional fishing, aquaculture or seaweed harvesting methods).” We strongly agree with this statement as it acknowledges the essence of coastal communities and their survival and guardianship of the marine resource.

15.26 Real consultation\* is key in achieving effective designations for specific evidence based needs without unnecessary burden on coastal communities

### Chapter 16 Nature Conservation

As Chapter 15 on fisheries dealt with so many issues we will only deal with a couple of specifics.

16.18 “Some types of fishing can negatively affect both pelagic and seabed communities, particularly those that support species with low growth rates, soft substrates or cold water coral reefs, and some areas have been heavily impacted by fishing activity. There are also concerns about the level of by-catch of birds, sharks and marine mammals in certain fisheries.”

This point fails to acknowledge that many areas enjoy the highest level of protection through their SAC and SPA NHA status and ongoing adaptation of fishing patterns is mitigating potential negative impacts. Concerns need to be based on robust scientific data.

### 17.0 Ports, Harbours and Shipping

Within the context of a MSP infrastructural investment is required and should be supported to maintain the sustainability of economic and social activities. This is particularly important in light of climate change which may cause unprecedented damage.

17.25 Dredging and disposal of the dredged material may impact on other uses and activities on a temporary basis. Dredging activity and disposal sites may not be compatible with other specific uses. There is need for open and real consultation that is engaged in by all sides.



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3. Do the Marine Plan Objectives broadly capture or reflect the things that you want to see in the plan? IF not, and in the context of the high level nature of these overarching objectives, are there additional objectives that should be included or should the draft objectives be amended?

As stated at the start of our submission we strongly identify and support objectives 1,2,3,4,5,6,7,8 with associated comments.

**4. The objectives of a marine plan can be supported or achieved in a number of ways. Some countries have used a policy based approach to guide the decisions of statutory consent authorities with respect to specific sectoral developments or activities. Others have opted for a more prescriptive zoning approach (similar to on land zoning through County Development Plans in Ireland). Taking account of the extent of Ireland's marine area and the varying degrees of activity that take place in our waters what do you think would be the most appropriate means of supporting the objectives of Ireland's marine plan – proscriptive, policy or somewhere in between?**

We cannot support a proscriptive zoning approach as we are highly dependent on the inshore waters and fish using an extensive spatial footprint as dictated by stock availability as well as other temporal and spatial drivers. A policy approach and mediated agreement of sharing of spatial areas.

**5. How can the marine plan be best aligned with the NPF?** No comment

**6. How can Ireland's marine plan be used as part of Ireland's climate change adaptation measures?** We have addressed the needs that may arise in terms of protecting and developing infrastructure. MSP should be central to this. MSP should also allow a degree of pragmatism that would allow any benefits conferred by changes in climate to be explored sustainably to underpin the economic and social sustainability of coastal communities.

**7. What measures do you think should be put in place to support optimal transboundary (including cross-border with Northern Ireland and with other parts of the UK) cooperation on marine planning?** No comment

**8. What infrastructure investments need to be made in order to maximise the sustainable potential of our ocean resource?** There needs to be continued investment in existing infrastructure to main the economic and social benefits around the coast and provisions in need to be made for increased protection of structures in light of climate change.



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**9. Environmental Assessment will be an important part of the preparation of Ireland’s draft marine plan and the plan itself. What are the relevant significant issues to be addressed by the SEA and AA processes and what environmental objectives should be used?** No comment

**10. This document is an important milestone in the development of a single national marine plan for the entirety of Ireland’s marine area. Thinking about the delivery of forward planning goals, what do you think would be the appropriate spatial hierarchy for future marine planning; for example, regional marine planning, a coastal zone or bay approach?**

Given the diverse nature of the uses and resources available from an Inshore Ector perspective a “one size Fits all “ approach is not appropriate. Solutions will need to be provided at various resolutions address the local regional and national scales that we operate on.

**11. What levers are needed to deliver greater efficiencies in administration and governance, when it comes to implementing and monitoring the NMPF?**

An agreed consultation process that all sides are aware of and engaged with is required should there is a change in the current levels of activities that may impact on the Inshore Sector. Real consultation is being able to change the outcome through input at the consultation stage.

**12. What are the key indicators for measuring the successful implementation of the NMPF?**

A thriving stable or increasing inshore sector. No constriction of the social or economic wellbeing of coastal communities.