

From: sarah foley [REDACTED]
Sent: 11 December 2018 23:09
To: Marine Spatial Planning <msp@housing.gov.ie>
Subject: Marine planning

Response to the invitation to comment on future marine planning:

Please carefully consider EACH of the below queries, and make a transparent public response.

- Which pillar will get priority: environmental or economic?
- There has been *no mention of strategies* for Marine Planning proved/disproved by other countries' trials.
- We need to have More detail given in sections on various forms of energy than on various environmental issues such as invasive species, eutrophication, natural carbon sequestration, climate change, etc.
- Little mention has been made of Marine Planning in relation to Goal 3 of HOOW (pg 13): for example prioritizing of building of museums/learning centres on coastlines, islands, or on the sea itself to increase the public's awareness of the nonmarket value of the sea and our maritime identity.
- The environmental side of Marine Planning should be about more than just trying to achieve Good Environmental Status by 2020 according to the MSFD for the environmental pillar. (pg 16) It should seek to preserve the marine areas for longer-term stability and resilience.
- When will the environmental assessments be available to the public as mentioned (pg 17)? **How can the NMPF be drafted before the results of these assessments are available?**
- Most aquaculture is NOT good for wild fisheries by its addition of nutrients into the ecosystem as is claimed. (pg 25)
- If the Naval Service and Air Corps are responsible for protecting oil and gas sites and renewable energy installations and these sites will be increasing in the future, there will need to be a different strategy to allow for the adequate protection of conservation sites and fishing areas in the future.
- Environmental baseline data cannot just be about filling data gaps about protected species in certain sites at certain times of the year. (pg 37) Baseline data should take more of a broader ecosystem approach to note how various species rely on larger areas **at different points in their lifecycle** and note how intricately entwined smaller sites may be in the thriving of many species that may not be observed in that site during short observation periods.
- Why is construction noise as an adverse impact on fish and mammals only mentioned as an issue for renewable energy and not petroleum energy (pg 42)?
- You have to date made no mention of research into greater height of offshore wind turbines being significant in reducing the effects on birds as claimed (pg 42). See <https://www.bto.org/news-events/press-releases/high-flying-birds-greater-riskcollision-offshore-wind-turbines> or mitigation strategies such as not running the turbines during peak migration times or not placing them along peak migratory routes.

- No mention of the role of seaweeds as a natural carbon storage as opposed to artificial Carbon Capture and Storage detailed in (pg. 48).
- Why are seismic activities as an adverse impact on marine life only mentioned as an issue for offshore gas storage instead of for petroleum energy (pg 51)?
- When will the study into Ireland’s resilience to a long term gas disruption and therefore the possible need for gas storage and LNG (pg. 51) be made available to the public? Will this be available before the NMPF is developed?
- **The MSFD does NOT provide the criteria to measure the environmental impact of activities in the marine environment as claimed** (pg. 66) and the sustainability of activities as claimed (pg. 69) if it is simply being used to put measures in place to achieve Good Environmental Status by 2020. There may still be longer-term and cumulative effects of more recent activities and interactions with climate change which may later prove that an activity was not sustainable even though it was assumed to be sustainable now.
- **MPAs should NOT protect traditional fishing, aquaculture, and seaweed harvesting if they are still at an unsustainable rate over that area.** (pg. 67)
- What is this “parallel process” which will identify, by the Minister for DHPLG, what additional MPAs are necessary to protect the environment? (pg. 67) And when will this information be made available to the public?
- There has been no mention of invasive species in the section on Nature Conservation or the subsection on MPAs. (pg 67-75)
- We see no map in the Nature Conservation section on the location of various habitats listed in the Habitats Directive, especially the ones mentioned as being in ‘inadequate’ status or ‘bad’ status.
- No mention has been made in the Nature Conservation section on the areas used/required by various species mentioned as requiring protection or monitoring or listed as endangered and there is no mention of whether there may be seasonally important areas as well.
- There is no mention in the Seaweed Harvesting section on the role of seaweeds in carbon sequestration, climate change mitigation, coastal erosion protection, etc.
- Why is there no mention in the Seaweed Harvesting section on the role of seaweeds in the health of the ecosystems and fish and crustaceans?

Pauline, James and Sarah Foley

