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Sent: 12 December 2018 21:11
To: Marine Spatial Planning <msp@housing.gov.ie>
Subject: NMPF Baseline Report Submission

Please find attached my submission to the National Marine Planning Framework Baseline Report.

Thank-you,
Julia Cooper
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Submission

Please find below a series of comments in response to the publication of the National Marine Planning Framework (NMPF) Baseline Report.

General Observations:

- There is no mention in the Baseline Report of the forms of Marine Spatial Planning that have been used to any advantage or disadvantage in other countries around the world.
- There is no mention of the thorough guidelines and advice available online from UNESCO on the creation of Marine Spatial Plans. See <http://msp.ioc-unesco.org/msp-guides/msp-step-by-step-approach/>
- There is very little mention of Marine Planning in relation to Goal 3 of HOOW (see section 2.5). For example, there could be plans for the construction of national museums or learning centers on coastlines, islands, or upon the sea itself to increase the public's awareness of the non-market value of the sea and our maritime identity.
- I would like to see further public consultation after a detailed analysis of the *future* range of sectoral activities envisioned to be important to Ireland's marine future. This public consultation should happen before moving on to the creation of a draft spatial plan which would currently be based only on the *current* status of the sectoral activities.
- More spatially-explicit data is required on the ecosystem characteristics of the marine areas included in the NMPF before it can be determined which activities may be able to co-exist with a healthy environment in various areas.
- There are no maps provided of environmentally sensitive areas except those *already* designated as SPA, SAC, or NHA. It is very important to make reference to all environmentally sensitive areas (with varying degrees of sensitivity) as a starting point from which to plan the interaction of human activities in marine areas. This should include all potentially sensitive areas even if they are not already officially designated sites.
- Many of the maps published in the hardcopy format of the Baseline Report were of such a poor scale that makes the most significant details unreadable. The online format was only minutely better –it is still impossible to see the details along the coastlines and in the bays. How can the public be said to be informed if the information given to them is unusable?

Marine Plan Objectives:

- One of the most important considerations for whether the Marine Plan Objectives reflect my interests is the answer to the question of whether the environmental pillar will get priority over the economic pillar. I believe that a healthy ecosystem must be the basic starting point to achieve before economic benefits can be attempted to be harvested at increasing rates from our ocean. If the main goal of the NMPF is to achieve the HOOW goal of doubling the value of our ocean wealth to 2.4% of GDP by 2030, then I disagree with the objectives of the Marine Plan. If the goal of the NMPF is to achieve GES of our seas by 2020 and then sensitively plan the location and interaction of various human activities in our seas in such a way as to not damage the GES but instead to always maintain ecosystem health as a priority over economic growth, then I agree with the Marine Plan Objectives.
- The first suggested “theme” (see section 24.5) as a possible Marine Plan Objective is, “Promote the sustainable development of a thriving ocean economy.” I would disagree with this simply because of the use of the term “sustainable development”. “Sustainable development” is an overused term which sounds trendy but has lost much of its meaning in recent years. “Sustainable development” means improving the quality of life of people at a rate that won’t ever deplete natural resources. It does NOT mean increasing financial wealth of people by removing the same amount of natural resources each year and not watching for any effects on the local ecosystems.
- Similarly, the second suggested “theme” (see section 24.5) mentions “growth of the ocean economy and the sustainable utilization of our marine resources”. The interpretation of this statement is too subjective to be able to be used as a Marine Plan Objective. If it were to mean the improvement of ocean ecosystem health to be able to be better used as tourism appeal, then I would agree. If it were to be interpreted as meaning increasing fishing quotas and aggregate extraction without intensive marine research into the ecosystems involved, then I would strongly oppose this objective.
- Suggested “themes” 3, 4, and 11 (see section 24.5) should be by-products of a Marine Plan, not main objectives.
- Suggested “theme” 5 (see section 24.5) noting an ecosystem-based approach to planning and keeping human activities to a level compatible with GES should be the *most important* objective of the Marine Plan. The only problem is that the statement currently says that activities could be kept at a level that “moves *towards* the levels compatible with the achievement of GES”. Instead, I believe that activities should always be within the level compatible with *maintaining* GES. The achievement of GES should be completed by 2020 and therefore should not be part of the NMPF which will likely be finalized shortly afterwards.
- Suggested “theme” 7 and 8 (see section 24.5) are also important objectives as they can help the public realize the wealth of the ocean in non-monetary terms and encourage the growth of sectors that use the ocean in ways that are not restricted to extracting tangible resources from the ocean.
- Suggested “theme” 9 (see section 24.5) should be an important objective as it will be imperative to complete extensive marine research if we are to understand the marine ecosystems enough to be able to follow an ecosystem-based approach as suggested in “theme” 5.

- The environmental pillar of the NMPF should be about more than just trying to achieve Good Environmental Status by 2020 (see section 3.19). Instead, it should seek to preserve the marine areas for longer-term stability and resilience to unanticipated changes such as those that may be caused by climate change.
- A main objective for the Marine Plan should be to plan for what sectoral activities should be encouraged in the future instead of basing the plan only on what activities exist currently. This should also link into the implementation of incentives and grants to encourage the development of positive activities (such as wave energy or eco-tourism) that don't exist much now.
- It seems that there is an unfair bias in the analysis of the sectoral activities surveyed in the Baseline Report. Some sections (such as those on Tourism, Marine Environment, and Nature Conservation) are only surveyed in vague generalities whereas the multiple sections on Energy give information in specific statistics and on locations of individual projects. It is striking that Energy receives 16 pages of attention whereas Nature Conservation receives only 5 pages and Tourism only 4 pages of attention in the NMPF Baseline Report. Yet, in the HOOW Report (see page 9 <https://www.ouroceanwealth.ie/sites/default/files/sites/default/files/Harnessing%20Our%20Ocean%20Wealth%20Report.pdf>), Offshore Oil and Gas is concluded as having the lowest potential for growth in our oceans and Coastal Protection and Tourism are concluded as having the highest potential for growth.
- Another main objective for the Marine Plan should be to conserve a large area of ocean through MPAs, SPAs, SACs, NHAs, and No-Catch Areas in order to safeguard our ocean wealth (of monetary and non-monetary value) for the future. As quoted by UNESCO, ***“Knowing which places are most important to conserve and which places are compatible with development is central to the art of Marine Spatial Planning.”*** <http://msp.ioc-unesco.org/msp-good-practices/analyzing-existing-conditions/>

Sectoral Activities Summary –Aquaculture:

- I disagree with the statement that, “aquaculture infrastructure can have positive impacts on wild fisheries by serving as safe havens for certain species or through the addition of nutrients to the ecosystem” (see section 5.12). The most prevalent forms of aquaculture in Ireland are NOT good for wild fisheries. Salmon farms are problematic for wild fisheries in that they contaminate the local ecosystems with disease, parasites, and excessive nutrient loads through the massive addition of salmon excrement in a compact area.
- There should be a plan for incentives to be used to encourage the creation of seaweed aquaculture farms. Seaweed is very important to mitigate climate change effects such as coastal erosion, coastal storm damage, and ocean acidification. Yet, seaweed farms are currently only operating on a very small scale compared to the proliferation of damage-inducing salmon farms.

Sectoral Activities Summary –Cultural Heritage and Assets:

- There is no mention of UNESCO World Heritage Sites such as Skellig Michael whose value is intrinsically linked to the preservation of the proximate marine area. The Tentative List recently submitted to UNESCO by

the Minister for the Department of Culture, Heritage and the Gaeltacht should also be considered as some locations on this list also lie close to the sea and, therefore, the use of or preservation of the sea in these areas should be considered carefully.

Sectoral Activities Summary –Defence and National Security:

- 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.

Sectoral Activities Summary –Energy –Petroleum:

- Environmental baseline data cannot be just about filling data gaps concerning the protected species that may or may not be found in certain sites at certain times of the year (see section 8.13). Baseline data should take 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.
- Whereas construction noise is mentioned as an adverse impact for fish and mammals in the renewable energy section (see section 9.23), it is never suggested as an adverse impact for petroleum energy exploration and infrastructure construction.
- Why are seismic activities, as an adverse impact on marine life, only mentioned as an issue for offshore gas storage (see section 12.12) instead of for the section on petroleum energy?
- The HOOW Report earmarks Offshore Oil and Gas as having the lowest potential for growth in our oceans in the future, so why is Petroleum Energy given so many pages of coverage in the NMPF Baseline Report?

Sectoral Activities Summary –Energy –Renewables:

- There is no mention of the consideration of factors such as greater height for offshore wind turbines being significant in reducing the adverse effects on birds as claimed (see section 9.23). See <https://www.bto.org/news-events/press-releases/high-flying-birds-greater-risk-collision-offshore-wind-turbines> for research into strategies for the construction and operation of offshore wind turbines that can mitigate the collision risk for birds. As renewable energy is becoming so important for the future, it is extremely important to raise awareness of factors such as reducing the operation of the turbines during peak migration times and not placing them along peak migratory routes that can significantly reduce the adverse impacts on bird populations.

Sectoral Activities Summary –Energy –Transmission Systems:

- I have no concerns with the summary of this sectoral activity.

Sectoral Activities Summary –Energy –Carbon Capture and Storage:

- There is no mention of the role of seaweeds as a natural carbon storage device. Wild seaweed stocks throughout the country should be conserved in order to provide a natural carbon storage which is both efficient and affordable. Also,

the addition of seaweed to our seas through aquaculture initiatives would also be an astute action to encourage through incentive programs.

Sectoral Activities Summary –Energy –Offshore Gas Storage:

- When will the study into Ireland’s resilience to a long term gas disruption and therefore the possible need for gas storage and LNG (see section 12.14) be made available to the public? Will this be available before the NMPF is developed?

Sectoral Activities Summary –Fisheries:

- I am concerned that the current fishing quotas and TAC are not in line with long-term global sustainability. More conservation should be encouraged in the form of no-catch areas and reduced quotas and a more effective enforcement of these should be ensured in order to safeguard the long-term sustainability of this activity.

Sectoral Activities Summary –Marine Aggregates:

- I disagree with the proposed extraction of marine aggregates for use in the construction of infrastructure such as buildings, roads, and bridges. Currently, extensive marine research is lacking and our understanding of the ecosystems within the sea is very limited. Therefore, it is ridiculous to conclude that the environmental cost of extracting marine aggregates is reduced compared to the use of land-based sources. The study mentioned (see sections 14.3-14.4 and 14.6-14.8) is only comparing CO2 emissions and road transport distances. Surely, this is not reason enough to dredge up large areas of marine ecosystems of which we know and understand very little.
- The proposed use of baseline data and dedicated monitoring programs are also not adequate to negate the detrimental effects to the local ecosystems of marine aggregate extraction. A baseline data report only dictates the number of different species surveyed at a specific time of year at that location. It does not seek to understand how important that area of land is to various species’ lifecycles. It is essential that an ecosystem-based Environmental Impact Assessment is carried out by an independent marine research team to learn more about our seas in these areas.

Sectoral Activities Summary –Marine Environment:

- The sectoral summary on the Marine Environment is lacking large amounts of information. Whereas the Energy section was broken down into sections on Petroleum, Renewable Energy, Transmission Systems, Carbon Capture and Storage, and Offshore Gas Storage; the Marine Environment section was not subdivided into a detailed analysis as it should have been. The Marine Strategy Framework Directive (Directive 2008/56/EC) establishes a set of criteria (see section 15.3) that will be very important to understand while moving towards our goal of achieving and maintaining GES. Therefore, it would be crucial to form a more detailed analysis of these topics. I would propose that the Marine Environment section be expanded into detailed sections on each criteria: Biological Diversity, Non-indigenous Species, Commercial Fish & Shellfish, Food Webs, Eutrophication, Sea-floor Integrity, Hydrographical Conditions, Contaminants, Marine Litter, and Underwater Energy (ie: Underwater Noise).

- The MSFD was designed to provide a means for countries to judge the damage done to their marine environment and to determine a means of focus on improving these environmental qualities. It does NOT provide the criteria to measure the environmental impact of current activities in the marine environment as claimed in the NMPF Baseline Report (see section 15.20). Nor does it provide the criteria to determine the long-term sustainability of activities as claimed (see section 15.36). There may be longer-term and cumulative effects of recent human activities and interactions with climate change effects which may later prove that an activity was not sustainable even though it is thought to be sustainable currently. It is better to err on the side of caution in allowing human activities in the marine environment and it is definitely not responsible to claim that activities can be judged to be sustainable if we achieve GES in our waters.
- More detail should also be provided on other environmental issues that will directly affect the stability of the marine environment in the future such as invasive species, natural carbon sequestration, rising sea levels, and climate change.
- I disagree that MPAs should protect traditional fishing, aquaculture, and seaweed harvesting (see section 15.24). Each area must be analyzed separately to determine whether the “traditional” activities are currently occurring at an unsustainable rate over that area. MPAs should be strict no-catch zones where the health of the ecosystem can be best preserved and scientific knowledge about these natural interactions can be gained.
- I believe that MPAs should not be “business-as-usual” areas for resource extraction. I would propose a zoning system for MPAs similar to those being used in some tropical rainforests. The centre zone of the protected area should be a strictly protected biological reserve with entrance allowed by permit only. Then a thick ring surrounding this zone should be an area where only traditional resource extraction methods are allowed. This helps to preserve the inner core ecosystems even more.
- What is the so-called “parallel process” (see section 15.27) which will identify, by the Minister for DHPLG, what additional MPAs are necessary to protect the marine environment? And when will this information be made available to the public? Surely the consideration of areas to be created as MPAs is a very complicated process that should include proper consultation with the public, various stakeholders, and marine environmental scientists. Otherwise, the creation of MPAs seems to be just a paperwork process that will have no effect on either human activities OR marine environment health.
- Sustainable Water Network (SWAN) has been actively working towards a community-based approach to MPA designations for quite some time. Why is this not mentioned within the NMPF Baseline Report?
- More scientific data is required to be mapped to determine which marine areas are important to be protected. For example, there is no mention of invasive species in the discussion on MPAs.
- More spatially-explicit data is required on the ecosystem characteristics of various marine areas before it can be determined which activities may be able to co-exist with a healthy environment in various areas.
- I would encourage the creation of biovaluation zoning maps similar to those created in Belgium’s Marine Spatial Plan to quantify the intrinsic biological/ecological value of different zones within the marine area.

- It is discouraging to hear that the government only “*intends* to introduce legislation” to prohibit microbeads in Ireland (see section 15.31). This legislation should already be fast-tracked and completed! As Simon Coveney, as former Minister for the DHPLG, said in a Marine Protected Area workshop in April 2017, “Over 3,000 contributions were received [to the public consultation process relating to microbead prohibition], which is a tremendous response to a public consultation. This clearly demonstrates that civil society is extremely concerned by marine environmental issues, which I find reassuring. Submissions received will now feed into the forthcoming legislative process.” (<http://www.antaisce.org/articles/a-bright-future-for-marine-protected-areas-in-ireland>) Is this how the public’s opinion is treated? With empty promises to *start* introducing legislation over and over again?

Sectoral Activities Summary –Nature Conservation:

- Why are MPAs discussed in the Marine Environment section rather than the Nature Conservation section? Are MPAs set to be solely paperwork labels that have no effect on the activities taken part within the so-called “protected areas”?
- I would advocate for a massive increase in protected areas within Ireland’s marine area. The Seanad recently passed a motion to secure 50% of our marine area as MPAs. It is a shame that this did not get passed through the Dáil. It is embarrassing that Ireland has one of the largest marine areas in Europe (see section 1.1) and yet has the second lowest percentage of marine protected area in Europe.
- There is 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. Surely this is an important spatial issue to consider?
- There is no mapping of peak migratory routes of bird species across our marine areas that may be important to consider in the planning of activities which may conflict with (such as wind turbines) or depend upon such routes (ie. nature tourism).
- There is no mention in the Nature Conservation section on the areas used or required by various species mentioned as requiring protection or monitoring or listed as endangered and there is no mention of whether there may be areas that are seasonally important to these important species in addition to their typical habitats.
- UNESCO recommends the Marine Spatial Planning process to identify marine areas which need special protection from many human activities because they contain: areas important to parts of the life-cycle of threatened species, threatened habitats, areas supporting unique or rare species, fragile habitats, habitats that are slow-to-recover from disturbances, areas of high natural biological productivity or diversity, areas with a high degree of naturalness, areas with endemic species, upwelling areas, spawning or breeding grounds, calving areas, feeding areas, nesting areas, nursery areas, haul-out areas, migration routes, and seagrass beds. All of these areas should be mapped properly before the addition of human activities into the marine areas is planned.

Sectoral Activities Summary –Ports, Harbours, and Shipping:

- I disagree with the plans to develop ports to allow for increases in ship sizes (see section 17.6).

Sectoral Activities Summary –Seaweed Harvesting:

- There is no mention of the role of seaweeds as a natural carbon storage that should be encouraged to be preserved in the wild and increased through aquaculture initiatives instead.
- Seaweed is very important for mitigating climate change effects and protecting against coastal erosion. These roles are overlooked in this summary.
- Seaweeds also play an important role in the health of the marine ecosystems by providing shelter to young fish and crustaceans. These roles should also be considered in the planning of various human activities within the marine area. Seaweed harvesting should not occur as a large scale industry, especially in conjunction with large scale fishing industries. Instead, seaweed harvesting should be balanced with large areas of strictly protected seaweed habitat.
- There is no mention of the intent to allow the mechanical harvesting of seaweed on large scales to begin in this country. This is completely different to the methods described in this Baseline Report and its omission is neglecting to adequately inform the public of the activities of this sector. Mechanical harvesting of seaweed has the potential to be devastating to the marine environment and is not possible to occur in conjunction with healthy fisheries and successful marine tourism.

Sectoral Activities Summary –Telecommunications Cable:

- I have no concerns with the summary of this sectoral activity.

Sectoral Activities Summary –Tourism:

- There is no mention of the UNESCO World Heritage Sites located adjacent to marine areas. The preservation of the marine areas near these sites would be crucial to support their tourism quality.
- The tourism appeal of the Wild Atlantic Way should be preserved by keeping intact the natural health of the marine areas along the Atlantic coastlines. Tourism has great potential for growth, whereas the siting of visually obstructive activities such as petroleum energy infrastructure, salmon farms, aggregate dredgers, and large fishing trawlers would be detrimental to the growth of the tourism sector.
- The analysis of the tourism sector is quite limited in the Baseline Report. There is limited mention of sailing and angling (see section 20.5-20.6), but no mention of the prime locations for whale-watching, kayaking, bird-watching, coastal walking trails, coastal driving routes, diving with rental equipment, and marine festivals/events.

Sectoral Activities Summary –Sport and Recreation:

- This summary is lacking maps for the locations of marine sports clubs and large-scale races/regattas. As sports and recreation is important to the mental and physical health of the public, many areas should be set aside for these activities. These spaces should be of prime water quality and be free from industrial activities.

Sectoral Activities Summary –Waste Water Treatment and Disposal:

- All wastewater should be treated thoroughly before discharging, not just wastewater that is discharged into areas where shellfish are being harvested.

Sectoral Activities Summary –Activities not included in the Baseline Report:

- There is no section dedicated to summarizing the activity of marine research and education. There should be specific marine areas set aside for this exclusive use.

Zoning or Policy Approaches:

- I would agree with utilizing a zoning approach to marine planning in terms of zoning for various types of protected areas that can exclude certain activities on a large spatial scale. But, I believe that a combination of various approaches would be best overall.
- I would encourage the creation of biovaluation zoning maps similar to those created in Belgium's Marine Spatial Plan to present the intrinsic biological/ecological value of different zones within Ireland's marine area. Then, invasive human uses can be planned more easily to coincide with areas of lower biological/ecological value.

Climate Change:

- There is no mention, in this report; of what activities will help to mitigate climate change rather than which activities may be affected by climate change. The best adaptation strategy may be to reduce the impact of human activities on our marine ecosystems so that they have the best chance of maintaining a high level of natural resilience. Seaweed farms should also be prioritized as a form of natural carbon capture and storage.

Infrastructure Investments:

- There should be more investments in seaweed farm infrastructure as well as eco-tourism infrastructure.

Environmental Assessment:

- When will the environmental assessments be available to the public as mentioned in the report (see section 3.30)? How can the NMPF be drafted before the results of these assessments are available?
- Environmental baseline data cannot just be about filling data gaps about protected species found in certain sites at certain times of the year (see section 8.13). Baseline data should take 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.
- More spatially explicit data is required on the ecosystem characteristics of the marine areas included in the NMPF before it can be determined which activities may be able to co-exist with a healthy environment in various areas.

Spatial Hierarchy for Planning:

- A bay approach would be ideal for some forms of planning in that it would be easier to involve the local people in its development. Yet, neither a regional,

coastal, nor a bay approach involves the plans for the broader marine area beyond the 12 nm Territorial Sea Limit. It is much of this area which is also important to be protected from damaging human uses beyond the watching eyes of coastal dwellers.

Indicators for Measuring Success:

- A successful implementation of the NMPF should see more significant changes in the use of the ocean. There should be more focus on the health of the ecosystems as priority and less focus on the extraction of resources for financial gain. If there can be a significant shift towards public appreciation of the natural health of the oceans and a significant increase in the marine area that is officially protected from harmful human uses, then the NMPF can be deemed to be a success.

Public Consultation:

- Many of the maps that were published in the hardcopy format were of a scale that makes the most significant details unreadable. The online format was only minutely better –still impossible to see the details along the coastlines and in the bays. Any further public information should be created at a quality that is usable by the public.
- Continued public consultations are important along every step of the process of creating the NMPF. Public consultation opportunities should be repetitively advertised through print media and radio as well as online to encourage a greater awareness of the opportunity to engage with the planning process.

Thank-you for providing the opportunity to receive my comments on the creation of Ireland's Marine Plan. I await the next stages in the process.

Julia Cooper

