



## **National Marine Planning Framework Baseline Report**

### **Comments by the Irish Whale and Dolphin Group**

The Irish Whale and Dolphin Group (IWDG) is an All-Ireland group, established in December 1990 and “dedicated to the conservation and better understanding of cetaceans (whales, dolphins and porpoises) in Irish waters through study, education and interpretation”. The IWDG is a registered charity (CHY 11163) and is registered with the Charity Regulatory Authority (No. 20029913) and is also a Company Limited by Guarantee (No. 332093). It is a membership based organisation and has grown into a credible, effective NGO with increasing influence on government policy and actions.

#### **Cetaceans (whales, dolphins and porpoises) in Ireland**

Twenty-five species of cetacean (whales, dolphins and porpoises) have been recorded within the Irish Exclusive Economic Zone (EEZ) to date. The variety of habitats available inshore and offshore allow specialised species to forage, migrate, calve and breed allowing populations of international importance to thrive. Both species listed under Annex II of the Habitats Directive occur within Irish waters and are entitled to the designation of marine protected areas (SACs) to protect important habitats. To date, five Special Areas of Conservation (SAC) have been designated for harbour porpoise and bottlenose dolphins under the EU Habitats Directive, in light of their importance for both species populations across Europe. All cetacean species occur on Annex IV and are entitled to strict protection.

Since the Marine Strategy Framework Directive (MSFD) is the environmental pillar of Marine Spatial Planning (MSP), its 11 descriptors are crucial to ensure that Ireland’s MSP acts in an environmentally sustainable manner.

Cetaceans are at the top of the marine food chain and as such, they act as sentinels for healthy marine environments. Declines in the abundance of cetacean populations or range, may reflect a change in biological systems which support them.

Maintaining food webs as part of the MSFD ensures that prey remains available to all marine predators including commercially important fish species. Large baleen whales such as fin and humpback whales have been documented following inshore movements of shoaling fish (sprat and herring) during spawning which influence the annual occurrence of these iconic marine mammals.

Persistent organic pollutants (POP’s) such as polycarbonated biphenyl’s (PCB’s) have been detected within sampled porpoises, dolphins and whales in Irish waters. While the concentrations of these persistent pollutants varied between species and regions, extremely high concentrations of PCB’s have

been detected within the inshore population of killer whales in Irish waters to a level which has likely made the population infertile and more susceptible to disease through immune-suppression (Jepson et al. 2016). Eliminating the input of POP's into the marine environment will help in containing contaminants.

Marine litter is an emerging threat for cetacean species on an individual level but not across entire populations. In a recent study involving 528 individuals from 11 species, 45 individuals (8.5% of the sample) had ingested macro-debris, while all 21 analysed for micro-plastics were contaminated (Lusher et al. 2018).

Marine noise is a well-documented anthropogenic impact on cetaceans globally (Richardson et al. 2013). Species can become disorientated, disturbed and displaced by underwater noise, which can negatively impact on body condition when displaced from a feeding ground or if their capacity to detect and feed on prey is masked. In some instances, sudden exposure to anthropogenic noise may cause deep diving whales to surface rapidly and not allow adequate time for their bodies to decompress which can result in death. As such, to conserve Irish cetaceans, it is imperative that underwater noise is below levels that adversely affect the marine environment as detailed in the MSFD's descriptor 11 for energy.

## **General Comments**

At some level the NMPF is being presented to the public and to businesses as though the marine area is an untouched resource ripe for exploitation – a new wild west. Nothing could be further from the truth. Our seas are already a greatly depleted and severely damaged ecosystem, heavily impacted by human activity.

- Populations of commercial fish have been hugely depleted from historic levels by a decades of overfishing.
- Whale populations are only starting to recover from massive depletion (of up to 95% in some cases) by commercial whaling.
- Most of our shelf seabed habitat (<200m) has been impacted by bottom trawling.
- Most of our deep-water reefs have been decimated by historic trawling.
- Our seas are increasingly polluted by noise pollution, affecting foraging, socialising and communication for a range of marine species, not least cetaceans.
- Our ocean carries the toxic burden of current and historic chemical and waste pollution, affecting the health of species and ecosystems.

We need to recognise that the cumulative effects of this human activity coupled with any additional pressures on our seas may result in severe and perhaps irreversible impacts to our marine ecosystems. This should be strongly emphasised at the outset of the NMPF process and be a prime consideration when considering licencing, zoning and managing existing and future impacts.

## **Marine Plan Objectives**

Objective 5 talks about '*ecosystem-based approach*' to management and achieving '*good environmental status*'. Both terms still carry some degree of ambiguity and we would suggest a more robustly defined

set of targets would be beneficial to be included as measurable objectives. In 2016 the IUCN World Conservation Congress called for a target of “30% of each marine habitat” to be set aside in “highly protected MPAs and other effective area-based conservation measures” by 2030. Currently less than 10% of global seas, and just 2% of Irish seas are designated as Marine Conservation Areas. Only one Irish MPA is fully protected from fishing, and many have no meaningful levels of management or monitoring in place. We strongly urge that more robust and measurable Marine Plan Objectives be put in place for habitat and species conservation, such as: **30% of Irish waters to be designated an ecologically coherent network of highly protected as MCZs by 2030.**

Specific Comments and Queries

**Paragraph 3.30** – Have the external consultants been appointed? if so who are they? How can we feed into the scoping and reporting phase of the EIA?

**Paragraph 12.6** – is this not a repetition of paragraph 12.3?

**Paragraph 13.6** – remove ‘as’ after ‘the EU rule-of-thumb applies to’...

**Paragraph 13.19** – worth noting one impact of increasing concern is competition from fishing for prey species (bait fish) of cetaceans, seabirds and other marine megafauna, leading to significant population impacts on seabirds and possibly cetaceans.

**Paragraph 14.3** – it is an oxymoron that mining can be sustainable; it is by its very nature not sustainable, as the resources is not renewed. This is as true for marine aggregates as it is for land-based sources.

**Figure 5** – The Rockabill to Dalkey Island SAC, Codling Fault Zone SAC and Lambay Island SAC, appear to have been omitted from the map.

**Paragraph 15.17 and Paragraph 15.34** – It is worth mentioning here the role of plastics, and particularly micro-plastics, in leaching, and binding and transporting chemical toxins into the bodies of animals that ingest them. This is an important potential secondary impact on marine species and food webs.

**Paragraph 16.1** – It is important to flag a major omission in the powers of NPWS in this paragraph, in that they have almost no role in the conservation and protection of populations of commercial fish – therefore are not in a position to manage one the key components of marine ecosystems.

**Paragraph 16.6** – this list should include beaked whales.

**Paragraph 16.6** – the paragraph states that Ireland’s marine territory supports large numbers of basking shark and small numbers of leatherback turtle. What is this statement based on? To our knowledge, no population assessment exists for either species in Irish waters.

**Paragraph 16.6** – otter is described as a ‘partly marine species’. It would better be described as ‘other species which live in both marine and freshwater habitats, such as otter, may also be listed for marine sites’.

**Paragraph 16.14** - *Evidence from monitoring of natural habitats and species in Ireland's marine environment indicates that many habitats are not in good condition. Improving and protecting these is a challenge to all users of the sea.* This should involve long-term commitment to recording marine mammals and seabirds on annual fisheries surveys to establish long-term datasets with which to detect changes in abundance and distribution. **This would contribute to Paragraph 16.20.**

**Paragraph 16.16** – this statement is factually incorrect of 24 cetacean species assessed in the last Article 17 reporting round; only 37.5% were reported as being in overall favourable conservation status, while 62.5% had unknown overall conservation status in Irish waters (NPWS 2013). Coupled with this are worrying indicators for several species in Irish waters including:

- 3 unusual mortality events of beaked whales recorded over the past decade, most recently in 2018 possibly involving hundreds of animals.
- A massive increase in common dolphin strandings on the Irish coast over the past decade with many animal stranding in poor physical condition.
- The reduction in sightings of fin whales off the Irish south coast in recent years.
- This is coupled with increasing impacts from overfishing, bycatch, marine litter and noise pollution.

Of the 24 species, 10 were assessed as least concern under the IUCN Red List; 4 as endangered, 1 as near threatened, 1 as vulnerable and 7 as data deficient. [Note: A new species was reported in 2016, bowhead whale, making a total of 25 species recorded in the Irish EEZ. The recent record of a Blainville's Beaked Whale was outside the current EEZ but within the proposed extension off the Hatton Bank, which would have increased the number of species recorded in Ireland to 26.]

**Paragraph 16.24** – to achieve this a better understanding of the distribution, abundance and movements of cetaceans (top predators) needs to be gained to inform planners and identify important habitats and at an appropriate resolution.

**Page 81** – the map is missing the following ferry routes

- Dublin - Isle of Man
- Dublin - Heysham
- Cork – Santander
- Cork – Roscoff
- Belfast – Cairnryan
- Belfast – Heysham
- Warrenpoint – Heysham
- Cross border ferries in the Foyle and Carlingford Lough

There are probably other routes also missing from the graphic.

**Page 82** – this map largely replicates the info on the map on page 81.

**Paragraph 18.13** – It must also be balanced against the ecosystem services supplied by seaweeds in terms of carbon sequestration and the role seaweed and kelp plays as habitat for a myriad of other species, including marine species of commercial importance.

## References

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