

# National Marine Planning Framework Baseline Report

## Irish Marine Federation Submission and Response



**Irish Marine Federation**  
Commercial Marine. Leisure Marine. Irish Marine.

December 2018

## Introduction

For the Irish Marine Federation, whose members are located throughout the coastal communities of Ireland, this proposed legislation is the most significant shift in Irish marine policy for several decades. For too long a lack of transparency and any meaningful framework for sustainable commercial development has hampered a significant number of projects, obstructed developments from completion, and has led to a detrimental effect on investment in the marine leisure sector in general. It is therefore reassuring to see the benefits of a framework for a decision-making process that is “consistent, evidence-based and secures a sustainable future for the marine area”. It is essential that a clear pathway is established and that the various parameters to the process are well known in advance, are robust and are timely in order to allow any planned development projects to be a success.

Within the scope of Marine Spatial Planning there are many competing activities from aquaculture, fishing, transport, energy, sport and tourism, all of which deserve to have an equal competing voice for a balanced and sustainable outcome to development needs. To this end we highlight the economic, social and environmental values of our sector and how it contributes to the economy, the social needs, employment and environmental protection of the coastal zone.

### Background to the IMF:

The Irish Marine Federation (IMF) is the national organisation representing both commercial and leisure sectors of the marine industry in Ireland.

The Primary Aims of the Federation are:

- To promote the interests of all sectors of the marine industry in Ireland and to encourage its growth and development;
- To represent the interests of the industry to Government, State Agencies and European institutions, thereby influencing public policies;
- To promote the image of the industry through quality awareness, public statements and the organisation of Boat Shows;
- To provide advice, information and services to members in order to assist in achieving these objectives.



## Sport and Recreation

At present the economic contribution from recreational boaters is largely underestimated by policy makers and thus impacts of potential restrictions on boating activity are not fully understood. British Marine Federation (2014) found that “for every job directly employed in the boating tourism sector, there are an additional 10 jobs supported in the wider economy through the direct and indirect effects of expenditures of boaters and boating tourism businesses”. In addition to the economic contribution from recreational boating are the social benefits the sector brings to people and communities, both directly and indirectly.

To put a picture on the global boating industry and illustrate the significance and scale of this sector:

- 100,000 direct companies
- 1 million direct employees
- 30 million recreational boats
- 25,000 marinas
- More than €45 billion in annual manufacturing turnover, with more than €20 billion arising in the boatbuilding sector
- More than 150 million participants across the United States, Europe, Canada and Australia.

(ICOMIA, 2018)

There is no published multiplier for the Marine Leisure Industry in Ireland, therefore the current analysis apply a multiplier of 1.60, based on the BMF (2014) and the ITIC (2015) report use of Fáilte Ireland’s multiplier. A multiplier of 1.60 suggests for every €1 million of output/ expenditure generated by the Marine Leisure industry would raise National Income by €1.6 million. That is, a further €0.6 million of output is created in the remainder of the economy (Leddin & Walsh, 2013).

The average annual economic contribution arising from marina-based boats is between €10,500 and €21,000 (RYA). There are currently in the region of 4,190 coastal marina berths in Ireland.

The Cool Route Traffic Study (2016) found cruising vessels within the Cool Route have an average standing cost of €6,800. This cost includes marina fees, insurance, repairs and maintenance, launching and storage fees. As the average boat size in Cork Harbour is smaller than the cruising vessel in the Cool Route Traffic Study, the current report employs a lower average standing cost (€4,500) for Cork Harbour. There are 400-day sailors/dinghies located in Cork harbour with an estimated annual expenditure of €400, resulting in total expenditure of €160,000.

Annual Direct Expenditure = (€4,500 \* 1,441) + (€400 \* 400) = €6.64m

The estimated annual direct expenditure by resident berths and moorings is €6,644,500.

The estimated annual total output from Cork Harbour residents of marine leisure activities is of the order of €10.631m.

In addition, the results suggest there is potential to grow berthing capacity and the number of visiting boats in certain parts of Cork Harbour leading to positive economic impact. For

example, by attracting an additional 100 visitor vessels per year, could generate approximately €62,400 or €390 per boat. Furthermore, improving access to onshore facilities including transport is likely to increase the length of stay of these visiting vessels, with the potential to contribute to the economy of the area. (The Economic Impact of the Marine Leisure Industry on Cork Harbour 2017, Cool Route)

Ireland has the capacity to host significant international maritime events. Cork Harbour and Dublin Bay are centres of world class yacht racing which could be further developed into a European centre of excellence for yacht racing, training and other marine specialist events and activities. Sailing events, such as the Dun Laoghaire Regatta, attract as many as 2,500 competitors, making it one of the biggest participant sporting events after the Dublin marathon. Tall ship events and marine heritage festivals could attract large crowds and promote maritime heritage. The Dublin Docklands and Tall Ships festival attracts over 40,000 visitors.

Coastal rowing takes place all around our coasts with different classes of boat in different locations. These events attract thousands of people to coastal communities for training and competitive events. In Gaeltacht areas, a thriving currach racing scene is enjoying a resurgence. Just two examples of all-community based sporting events. Sea Scouting is yet another example of engagement in the marine environment by our coastal communities.

All of these are examples of how Sport and Recreation plays a significant role in the maritime fabric of Irish life and it should be underlined how important this is by referencing Goal 3 of HOOW “to strengthen our engagement with the sea— strengthening our maritime identity and increasing our awareness of the value (market and non-market), opportunities and social benefits”.

Year-round sustainability is more achievable in this sector as the building of marinas has allowed recreational craft to remain in the water year-round, fully insured and in a safe and secure location. Although time on the water peaks in the summer months, spend from the boating community and demand for the leisure marine industry extends throughout the year. This relative absence of seasonality means that recreational boating provides a key source of revenue and employment opportunity for coastal communities which should not be underestimated.

One applicable example is a sail making firm established in Crosshaven. Co. Cork in 1974. It continues to operate to this day, a thriving small Irish business that designs and exports sails all over the world. It grew thanks to the enterprise of a local initiative by Royal Cork Yacht Club to develop festivals and events such as the world-renowned Cork Week regatta.

Finally, we note Map 14, *Marinas around the Irish Coast*. We believe this image to be out of date and in need of some correction. We also consider it to understate the true picture of marinas, pontoons and jetties around the Irish coastline and we therefore submit an updated version, Figure 1, which we believe represents a more accurate reflection of the infrastructure which accommodates local as well as cruising vessels.

# IRISH COASTAL MARINAS, PONTOONS & JETTIES

From 800 berth marinas to simple jetties, here's over 60 facilities around our coast.



Source: Afloat.ie

Figure 1: Irish Coastal Marinas, Pontoons and Jetties

## Tourism

Much of Ireland's 6,500 kilometres of coastline has a scenic value that is comparable with or exceeds that in many other European countries, provides superb beaches for water-sport activities such as swimming, surfing, kite surfing and small boat sailing. Similarly, in terms of visitor experience, the offering to tourists in the south and west coast provides coastal cruising of an unprecedented quality and is acknowledged as some of the best cruising grounds in Europe.

However, the comparative lack of marinas and other infrastructure puts the Irish product at a disadvantage compared to most other European countries. The east coast of Ireland also has an interesting, if different coast line with a host of seaside coastal communities, busy harbours and estuaries which provide a natural resource together with a marina infrastructure to cater for both domestic boat owners and visitor cruising boats from the UK, continental Europe and further afield.

The traditional and important cruising routes into Ireland from Wales, South West England and Scotland need to be protected. The possibility to sail into a European capital city, as you can directly into Dublin, is a prime destination for the cruising boat owner. Ireland, as an island nation, has a marine environment which is particularly advantageous for marina and coastal tourism.

Tourism is a cross cutting sector and research has shown that clusters of businesses form at harbours and marinas from boat related businesses, such as boat sales, boat repair yards, sail lofts, passenger boats providing eco tours and whale watching, sea angling trips and diving schools. In addition, youth sailing and disabled access sailing is carried out in sheltered waters where there is access to storage and launching facilities ashore.

The recent recession has sparked the creation of new businesses in the low barrier to entry sectors like sea kayaking, paddle boarding and surfing, as well as other beach-based activities like junior marine science camps. All these activities have one thing in common, they all need access to the water.

As new products and new sports develop there will be new activities, 20 years ago there was no kite surfing or holidays in lighthouses. Fishing kayaks have made an appearance in recent times along with electric powered canoes, hybrid boats, solid wing sail boats which develop amazing speed in light winds. The future is not easy to predict but marine coastal tourism will continue to grow and put more pressure on our environment, however, with proper integrated management this should not have a detrimental effect.

Within Europe, the importance of marine and coastal based tourism to the social and economic well-being of its citizens has been readily acknowledged (European Commission 2014). The sector's potential to foster a smart, sustainable, and inclusive Europe is viewed as a key contributor to delivering the aims of Europe's Blue Growth strategy.

Whilst official statistics for the full economic value of marine and coastal tourism are not available, estimates derived from surveys by Fáilte Ireland suggest that this segment of the tourism market is worth €2billion to the Irish economy (Quinn 2014).

Tourism features within the four priorities of the Atlantic Action Plan (European Commission 2013). This initiative is being implemented by the EU's Atlantic Member States as a means of supporting regional development within the marine and maritime economy

of the Atlantic Ocean area.

At the national level extensive references are made to marine and coastal tourism and its potential contribution to Ireland's ocean economy in *Harnessing Our Ocean Wealth – The Integrated Marine Plan for Ireland (2012)*. The importance of the marine and coastal tourism sector is evidenced by the fact that it is often seen as either a catalyst for economic recovery or a mainstay of economic performance.

Given that Ireland is an island nation and that we have pristine waters and acknowledged world class cruising grounds the opportunity to grow this sector is obvious. To assist in this objective a fully integrated Marine and Coastal Tourism Plan needs to be developed as a blue print for growth.

One recent example of effective specific strategies to support investment in coastal and marine infrastructure and development is the 'Cool Route Project'. This project was set up to investigate all aspects of the practical logistics and business potential to establish a bi-directional yacht cruising route along the western offshore areas of the Northern Periphery Area, stretching from Co. Cork in the South of Ireland, to the UK (Northern Ireland and Western Scotland) and onwards to the Faroe Islands and Norway. The Cool Route Cruising Ground, described in the *International Yachting Press* as the "World's Most Adventurous Cruising Ground", is one of the most attractive coastlines globally.

Partners in the Cool Route Project include Cork Institute of Technology (Lead partner and Business Planning), Donegal County Council (Project Publicity and Dissemination), Glasgow Caledonian University (Route Logistics and Planning), The Royal Cork Yacht Club (Project Route Marketing), Derry City Council (Common Booking System), Torshavn Port Authority (Expert inputs safety), Western Norway Research Institute (Rural Tourism Development).

Associate partners and other project participants include the Irish Cruising Club, Donegal Tourism, Sail Scotland and the Irish Sailing Association, along with a wide range of Local Authority, Local Development, Tourism and Sailing interests.

The objective of the Cool Route Project, co-financed by the Interreg Northern Periphery and Arctic Programme was to strengthen the market reach and customer base for SMEs in remote communities, develop an exclusive product package to attract high end customers, develop a joint marketing strategy and ICT solution and design a marketing model focusing on "place based" development opportunities for a very wide range of tourism, activity holidays, cultural and heritage attractions, local produce, crafts, restaurants and marine services. The Cool Route Project has successfully delivered on all of its objectives.

This clearly demonstrates the significant expertise and cross-sectoral cooperation that exists and with further investment in enhanced infrastructure, the potential to deliver sustainable products, services and jobs from the marine tourism sphere.

Fáilte Ireland's Wild Atlantic Way strategy, largely a land-based tourism initiative is described as "where the land meets the sea." This strategy in itself does not directly strengthen or promote the maritime, water-based, aspects of this tourism destination brand in any meaningful way. Instead, it focuses heavily on the scenic attraction of the region, although Fáilte Ireland are currently supporting a new surfing centre of excellence in Sligo and this a welcome development.

In Europe marine and coastal communities see marine tourism as a means to sustain and develop the local economy, often displacing redundant industry sectors. The introduction of new skills to the area assists in keeping young people in their communities and providing new careers.

It should also be noted that many boats are kept in small harbours and on swinging moorings around the country. Marinas in Ireland are not located close to each other and there are large distances between marine locations in the West and North Coasts.

Access to the many offshore islands off our coast is an important marine and coastal tourism economic driver which needs to be exploited in a sustainable way to ensure that the benefits of tourism can penetrate isolated and less visited islands providing new channels of income and employment.

Our concern is that this sector is not properly understood and that marine coastal tourism should be considered as a significant planning layer when it comes to marine spatial planning.

The need for convergence between marine and tourism policy is essential for future sustainable development from both the social and economic perspectives. The use of MSP to deliver these objectives must be addressed as the current system of consent and licencing does not support nor does it provide for the development requirements of this and other sectors of the marine field.

Marine Spatial Planning would, when allied with a fully coordinated local authority planning process, make for a more efficient and coordinated decision making process. If this was then developed as a component of an integrated marine and coastal tourism plan, it would assist economic and social development and reduce any potential conflicts between competing sectors.

The difference between this approach and terrestrial planning is the major factor which has been absent in the process. It is essential to recognise that this is a marine based initiative deliberating on the connection between the land and the water and where the transnational aspect of those marine connections originate.



## International Boundary Issues

This topic is of particular interest to our members who are situated in what only can be described as ‘contested territorial waters’. Despite both UK and Irish governments signalling a willingness to resolve the matter, it is still unclear where the border lies, who has control over the foreshore area and therefore the rights and responsibilities enshrined in law for these waters. It is also most concerning that a UK Foreign and Commonwealth Office spokesperson is on the record stating that “The UK position is that the whole of Lough Foyle is within the UK. We recognise that the Irish Government does not accept this position”.

With Brexit a likely reality in the short term, the fact that the boundary issues situation has not been resolved beforehand is a matter of great concern to us. We therefore have issues with the role out of the proposed Marine Spatial Planning legislation before any definitive resolution of the international boundary has been concluded. We would urge the Government and relevant cross border agencies to engage in a meaningful process to come up with a workable solution to the border lough issues and give certainty to marine businesses operating in both jurisdictions.

## Marine Protected Areas

The Irish Marine Federation wholly recognises the significance and importance of Marine Protected Areas. It supports the vision of ecologically diverse and dynamic oceans and seas which are clean, healthy and productive. Successful marine protected areas enhance biodiversity and the ecological health of the areas they impact and can provide improved economic opportunities through tourism and recreational fishing. From our members perspective there is a concern that, in the future, areas of coastal waters and seabed become restricted or even no-go areas, where previously the right to free navigation existed. It is important to explicitly highlight that this free navigation includes anchoring, considered a normal and legal practice for vessels. What is also an important consideration in this matter is the movement of vehicles, trailers and boats across the foreshore below the High-Water mark.

When considering whether it is appropriate to designate an area as an MPA, due regard must be had to any economic, social and cultural issues of doing so. Additionally, there is a need for objective and robust evidence in the decision-making process when defining areas to be considered for MPA status. It is important to note that this requires early planning, a strong baseline understanding of existing environmental conditions prior to zoning being implemented, and a plan in place to identify and monitor environmental indicators. Finally, the enforceability of any offences and penalties connected to MPAs must be considered before granting MPA status.

It should be remembered that meaningful stakeholder involvement is ideally a two-way exchange of information and ideas between stakeholders and governing bodies. It is evident that many of the concerns of boaters are linked to an underlying fear of the unknown – a fear that may be amplified the longer an MPA planning and consultation process proceeds. In order to mitigate such reactions, we would stress the importance of meaningfully involving stakeholder groups in MPA planning

## Marine Environment

The marine industry is fully conscious of the requirement to improve our environmental performance as without a good quality pristine product we would have no long-term business.

The IMF endorses the measures proposed to target causes of marine litter specific to the marine sector. Although the majority of marine litter originates from land-based activities, the shipping industry, including the fishing and recreational sectors, is also an important contributor, with discharges of garbage, including plastic and derelict fishing gear, going directly into the sea.

Our marina members are holders of Blue Flag and ICOMIA Clean Marina accreditation and strive to continuously improve the waste reception and storage facilities at their locations. All marinas operate a “no discharge in port” policy to ensure the harbour and estuary waters are not

contaminated. The European Commission Recreational Craft Directive has, since 2003, obliged all watercraft equipped with toilets to be connected solely to a holding tank system or a water treatment system. The ability to discharge sewerage directly into the sea is no longer possible thanks to this Directive.

The IMF is also working on an end of life policy for recreational craft, and in particular of fibreglass construction, to ensure environmentally effective disposal and recycling for redundant vessels.

We note that the specific problem of marine litter warrants additional measures, which should result in a further reduction of garbage discharges from boats. This should be achieved through a combination of incentive and enforcement measures. For us the preferred policy option is to make an important contribution to the circular economy through special measures focused on reducing marine litter, including waste originating from the recreational sector, and improving waste management practices in port

We have, however, deep concerns over the distinct lack of waste collection and management facilities in coastal locations under the control of local authorities and other public bodies. We believe their standard in this matter is well below that which is acceptable and that any future measures to target causes of marine litter must specifically include these groups in formulating a solution to the matter. It is not enough to simply place the onus on port reception facilities when identifying locations and sectors responsible for the collection and management of marine generated litter. All organisations and bodies who have authority and responsibility for locations where marine litter is landed, must be included in any future legislation. We must each do our share to ensure the issues of marine litter disposal is effectively managed. Any general exemption to small or very small ports would raise certain concerns. The size of the port should not be an obstacle to meet certain minimum requirements like handling simple waste management plans and issuing waste receipts when required.

These proposed improvements are also expected to increase business opportunities for waste operators in ports, as well as operators in the recreational and tourism sector, most of which qualify as SMEs, as more waste should be landed in ports, resulting in a cleaner marine environment, with positive effects for local and regional tourism.

One of the major contributors to marine litter is the fishing community and the IMF strongly supports programmes and initiatives to reduce the litter impact of fisheries on the environment and other sectors within the maritime community.

## **Energy – Renewables**

With an increase in interest for offshore wind farms around the Irish coast, it is important that all stakeholders are engaged in the planning and development to ensure the best possible outcome.

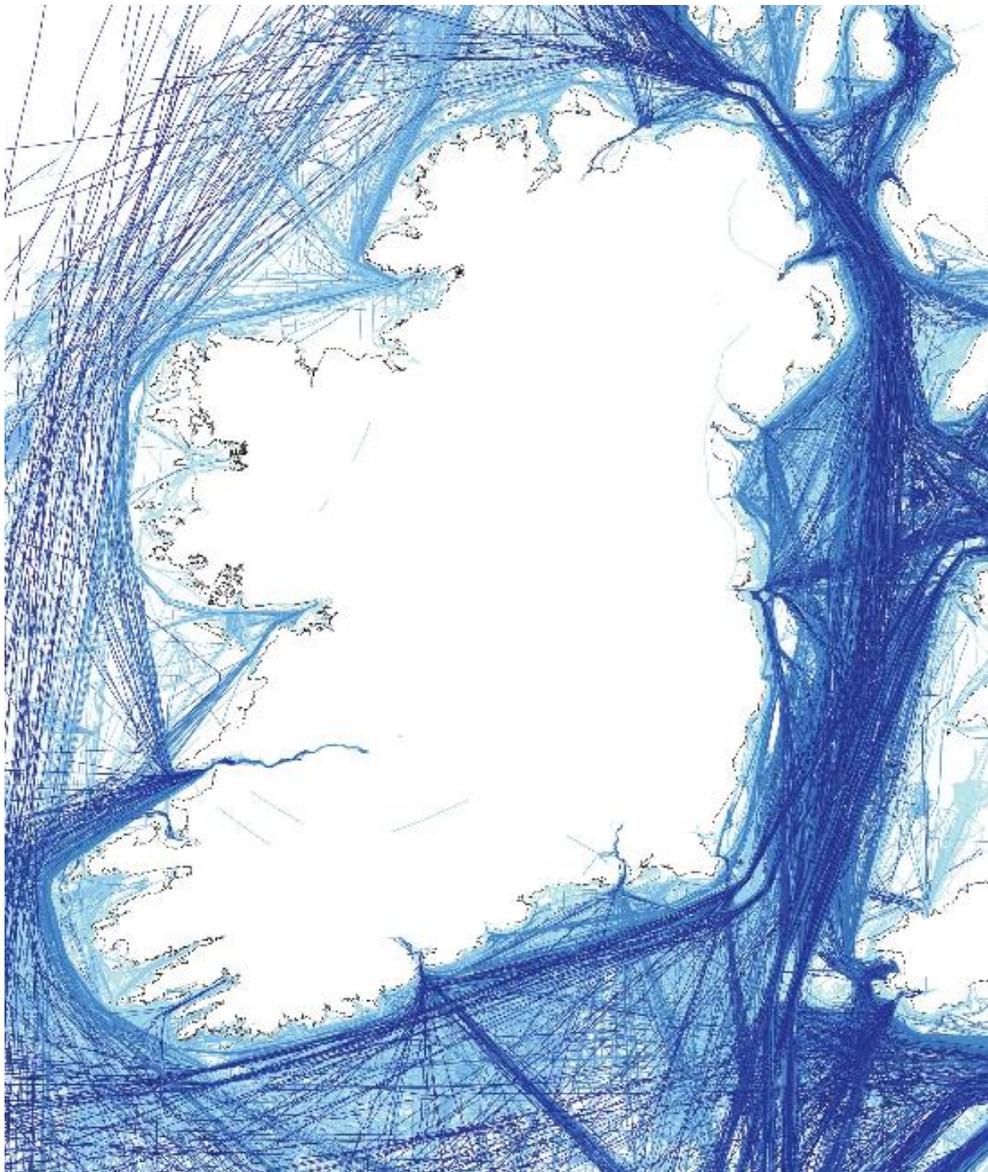
The concern of the Irish Marine Federation is that navigational safety of recreational craft may be compromised. The most important issues highlighted for recreational craft are:

1. Avoidance of 'squeeze' of craft towards shipping lanes and dangerous coastlines
2. Minimisation of 'diversion' from the safest, most efficient or traditional routes

It is of utmost importance that key safety parameters including a minimum turbine blade height, appropriate charting as well as marking and lighting requirements are clearly established before the development of any offshore windfarms. Consultation and cross-sectoral collaboration from all the relevant stakeholders should be sought when new offshore energy projects are being discussed and proposed at planning stage.

The location of the renewable developments in proximity to marinas or associated access routes may adversely affect marina developments, or the potential for investors to upgrade/expand existing marinas. This would be largest with developments which form a direct blockage to the main access routes to the marinas and nearby anchorages, or dissuade potential recreational boat owners from visiting certain locations due to the perceived increase in navigational difficulty.

With developing technologies around tidal and wave installations, a minimum safe water clearance over submerged structures and associated infrastructure is needed to ensure safe passage of recreational craft along the coastline.



Source: Irish Lights Strategy 2018–2023 Safe Seas – Connected Coasts

Figure 2 AIS data representation of vessel activity around the coastline during 2017

As can be seen from Figure 2, the traffic density on the east coast, in particular, is considerable. Any attempt to reduce the already limited safe navigable waters should be given close scrutiny, with the impact of proposed offshore windfarms of very considerable size being located in some of the busiest waters and close to large urban areas. The use of a 12nm 'buffer zone', as is used in other jurisdictions, should be given serious consideration for congested waters and close to large urban areas or areas of particular scenic and tourism importance.

It is clear that much additional consideration must be given to an industry that is in its infancy in Irish waters.

Only through open dialogue and a consensus between stake holders can meaningful progress be made on opening the seas to renewable energies in a safe and successful manner.

## Ports, Harbours and Shipping

Through the many large and small marina locations and harbours dotted around the coastline of Ireland, the number of "passengers" who visit the country is, we believe, understated. The net contribution by leisure marine tourism, people who arrive in Ireland by small boat whilst cruising, is not an insignificant amount and one that regularly goes underrepresented or even unaccounted for.

To quote one such example, Dun Laoghaire Harbour received 1,063 passengers from cruise ship visits in 2017 (Table 6, National Marine Planning Framework Baseline Report). In the same year Dun Laoghaire Marina received 2,356 visiting crew/passengers. Dun Laoghaire Marina is one of several marinas located in Dublin, so the net benefit to Dublin County is not inconsiderable.

In rural areas, the example of Kilmore Quay could not be more appropriate. A small Council run fisheries harbour that has developed into a significant marine leisure and tourism destination in its own right. The 60-berth marina is regarded by many as the first point of arrival for boats arriving from the UK and Continent and as the last respite before the long sea passage onwards. As the fishing industry has declined, a lacuna existed into which the marine leisure sector could successfully integrate. The revenue from the leisure side now ensures a successful small harbour and community in what otherwise would likely have become an economic blackspot.

This can then be applied around the entire coastline as cruising boats will stop at many/most marinas along the coastline which they are cruising.

The point here is the economic impact and benefit of the coastal marina and small harbour network around the coastline and the importance of protecting routes and cruising grounds used by recreational craft.

Many of the topics highlighted in *Part 3 'Issues for Other Sectors' in 17.0 Ports Harbour and Shipping* apply to recreational craft also, including the sea space for safe and efficient navigation and the investment in infrastructural development to have a positive impact on the tourism sector.

Further, in recognition of *Part 4 subsection 17.29* the IMF strongly endorses supporting the tourist sector, promoting safety at sea, encouraging development of coastal infrastructure and commercial activity.

## Fisheries

Of particular concern to IMF members is the control and identification of inshore fisheries in Ireland. The specific problem is with boats being fouled and entangled with sea fishing gear, such as nets, pots and associated markers, flags and lines etc. The navigational safety risk imposed by these obstacles should not be underestimated.

This risk is shared equally by the recreational fleet, emergency services craft and smaller commercial vessels. In turn this has an effect on the level of usage of inshore waters and can, when severe, be detrimental to the economic sustainability of harbours and businesses located near to these areas of high-level inshore fisheries.

It is hoped that MSP legislation will seek to bring this issue into focus and ensure that all users can access the waters in a safe and productive manner with no single group being excluded or favoured over the needs of another.



## Conclusion

Marine Spatial Planning is a necessary and important process to help ensure that we can continue to make use of the sea's resources and enjoy the sea without degrading those resources. A fully developed and integrated management process is essential for the sustainable development of our coasts and sea areas.

With Ireland coming relatively late to the implementation of MSP legislation, the opportunity exists to learn from other jurisdictions and understand best international practice when formulating the initial strategy and implementation of our own policy.

The Irish Marine Federation submission agrees, supports and reinforces the MSP Baseline reports links to the National Planning Framework that Marine Spatial Planning should be integrated with terrestrial planning (page 17).

The IMF recommends that:

- MSP must be fully integrated with terrestrial planning. To make MSP successful there must be a new consent and licencing process in place, ideally all three; MSP, terrestrial planning and consent and licencing should be in one body.
- A fully integrated marine coastal tourism policy must be developed.
- It is clear that a continued process of engagement with all the relevant stakeholders as part of a cross-sectoral collaboration is essential to bring about an integrated policy and strategy that will be for the mutual benefit of all parties involved. No one sector or facet should receive favourable status to the exclusion or detriment of other marine sectors and groups.
- Due consideration should be given to existing and future likely density patters around the coast when assessing the impact of proposed offshore projects. The implementation of a buffer zone in areas of high traffic and visual amenity should not be ruled out, nor should other design criteria to allow safe navigation be excluded from the process.
- MPA's should not be established in a way that is detrimental to other users. A full and open dialogue is essential for 'buy in' by all stakeholders.
- Port waste reception and marine litter management responsibilities should be extended to include local authorities and other public bodies who have control of coastal areas.
- Continued support is given for the development and/or refurbishment of the coastal infrastructure to promote tourism, jobs, investment and economic sustainability for our coastal communities.



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