



Bantry Bay - Protect Our Native Kelp Forests is a diverse community of people who have come together to protect the marine ecosystems of Bantry Bay by preventing the mechanical extraction of kelp from this vibrant and unique environment; we are creating solutions to protect, nurture and sustain our future and the future of Bantry Bay.

We welcome the publication of the *National Marine Planning Framework Baseline Report* as a key step in the development of Ireland's National Marine Planning Framework. We commend the Department of Housing, Planning, and Local Government for its commitment to public consultation in the development of the NMPF, evident in the public engagement events which preceded the *Report's* publication, the Regional Launch Events subsequently held throughout the country, as well as this opportunity to submit feedback on the *Report*. We also wish to thank the members of the Department's Marine Spatial Planning Team who travelled to Bantry to engage with our local community, and look forward to continued communication and contribution in the on-going development of the NMPF.

As a community, we have read and discussed the *Baseline Report* with interest, and this submission attempts to gather together some of the major themes and concerns that have emerged in our consideration of the *Report*, drawn from numerous conversations as well as more than a dozen distinct submissions which individuals have prepared over recent months,

The Fractured Administration of Ireland's Marine Affairs

As the *Baseline Report* itself recognizes, prior to 2012 'the organisation and regulation of activity in Irish waters was being carried out on a sectoral and demand-driven basis, without a strategic framework in which sectoral policy objectives could be envisioned, planned and delivered over the long term' (§1.5). Indeed, a commendable objective of the NMPF 'is to provide a more integrated governance structure that will co-ordinate all of these specific departmental or "sectoral" areas into an overall strategy' (§1.4).

Such integrated governance is still sorely needed, as the *Report's* Annex A itself makes clear: various aspects of Ireland's marine governance are currently scattered throughout nine of our seventeen government departments. Regrettably, the *Report's* eighteen sections on Key Sectoral Activities make little headway in this regard, with most considerations of the 'Issues for other sectors' containing little more than vague generalities, with few concrete suggestions (aside from the banal observation that all marine users make use of the same ports).

Such fractured governance increases the potential for duplication, error, or for important details to be overlooked, and hinders the effective implantation and regulation of current standards and the future NMPF. Such serious fractures are evident even within Ireland's seaweed industry, where licences for the cultivation and harvesting of farmed seaweed (classed as aquaculture) are overseen by the Minister for Agriculture, while licences for the harvesting of wild seaweed (classed as foreshore activity) are overseen by the Minister for Housing.

Although we recognise that DHPLG is committed to playing the role of ‘honest broker’ between all the varied departmental and sectoral interests, we believe that the establishment of a dedicated Department of the Marine is ‘a key lever to deliver greater efficiencies in [the] administration and governance’ of Ireland’s seas, and to the successful delivery of the NMPF.

Given the Marine Institute’s observation that Ireland’s marine territory covers an area more than ten times our land mass, as well as the Government’s own commitment to increasing the value of our ocean wealth to 2.4% of GDP by 2030, a dedicated, independent Department of the Marine should play a key role in our NMPF.

Blue Health produces Blue Wealth

While recognising that (a) one of the three high-level goals guiding the NMPF process is ‘to protect, preserve and, where possible, restore our rich biological diversity and ecosystems’ (§2.4), and (b) that three of the proposed themes (§24.5: nos. 1, 5, 10) which may inform the development of the NMPF’s strategic objectives prioritise environmental integrity, we are, nonetheless, shocked that the health of our marine ecosystems receives so little attention in the *Baseline Report*, and fear that these fine words devoted to the environment may ring hollow in the eventual practicalities and priorities enshrined in the NMPF.

To take the example of climate change: it is astonishing that it receives so little attention in the *Report*. Aside from a brief discussion in the introduction and conclusion (§§3.39-40, 24.5), the only detailed consideration occurs in §6, dedicated to Cultural Heritage and Assets (other brief mentions occur in §§8.12, 9.18, 16.20 and 19.12)! Indeed, it is a little disturbing that one of the *Report*’s twelve consultation questions appeals to the public for their advice: ‘How can Ireland’s marine plan be used as part of Ireland’s climate change adaptation measures?’ Given that the UN’s Intergovernmental Panel on Climate Change’s recent report, *Global Warming of 1.5°C*, warns that we, as a planetary community, may have no more than twelve years to effectively mitigate climate change – a span of time well within the twenty-year horizon envisioned for the NMPF – as well as the fact that Ireland is the only country within the EU to achieve a ranking of ‘very low’ in the 2019 Climate Change Performance Index (overall score: 40.84), we might have expected our Government to place climate change in a priority position at a far earlier stage in the development of our nation’s Marine Spatial Plan.

This lack of care, and forward thinking, is evident even in the *Report*’s treatment of Carbon Capture and Storage (§11), which is devoted entirely to the artificial technology chain which removes carbon dioxide from the atmosphere. There is no mention of the natural carbon sinks which already surround our coastline – in the form of our native kelp forests – and the key importance of their preservation. A recent study has estimated that, globally, ‘macroalgae sequesters about 634 million tonnes of carbon dioxide per year ... greater than the emissions of Australia, the world’s 13th largest emitter’,¹ yet such environmental benefits of maintaining, and, indeed, cultivating our seaweeds receive no mention in the *Report*.

¹ Patrick Cage, ‘Kelp and Carbon Sequestration: Bringing Terrestrial Carbon Accounting to the Deep Sea,’ *The Carbon Institute: Blog*, <http://carboninstitute.org/kelp-and-carbon-sequestration-bringing-terrestrial-carbon-accounting-to-the-deep-sea/> (accessed 14/12/2018); citing D. Krause-Jensen & C. M. Duarte, ‘Substantial role of macroalgae in marine carbon sequestration’, *Nature Geoscience* 9 (2016): 737–42.



We present this as just one example of how the *Report* tends to overlook one of the three key pillars which, it claims, will guide the NMPF process: the importance of healthy ecosystems. The seas around our coasts, and our ocean waters, are areas of immense biodiversity, with complex, intricate, and interlocking ecosystems, which, as of yet, are very poorly understood. It would be rash, and could be disastrous, to rush into these waters in pursuit of short-term, even short-sighted, goals, and so we appeal to the Government to insure that ecological integrity is central to our NMPF. Understanding our marine environment, and the complete ecological consequences of our human use and development of that environment, are essential to maintaining our Ocean's Health, and with that, our Ocean's Wealth. We fully support the economic and social development of our waters, in ways that can make our communities thrive, but we wish to see an NMPF which heeds the wisdom of the *Report's* own words: 'Protection of our marine ecosystems and compliance with environmental legislation are essential components of our ecologically sustainable future and need to be seen as an essential enabler for a thriving maritime economy' (§2.4).

Care for Our Common Home

As a campaign, we are dedicated to engaging and working with all the varied communities and stakeholders who make use of our Bay: from inshore fishermen to tourists and tourism providers, from restaurateurs and artisan food producers to commercial and passenger shipping operators. We recognise that our kelp forests provide the foundation for an ecological system which supports not just the marine life in our Bay, but all the human life which occurs upon its waves and upon its shores.

Therefore, when reflecting on the appropriate means of supporting the objectives of Ireland's marine plan (proscriptive/policy, etc.) and the appropriate spatial hierarchy for future marine planning, we would hope to see Ireland's coastal communities placed at the very heart of the future NMPF. The *Baseline Report* provides a wide-ranging overview of the extensive human activities which take place on and around our seas, but all these activities take place within a wider network of human relationships shared by those who perform them. As a result, we believe **the community** – in all its complexity – should become the basic building-block of the NMPF.

This may certainly not be the easiest way to construct a Marine Planning Framework, but it will, in the end, surely be the most effective. Communication is essential in such a process, and effective communication must be two-way. Local stakeholders need to be informed about, and involved in, the efficient management of their coves and harbours and bays, and they need to be consulted, and involved, in any developments, proposed or attempted. Local concerns should be heeded; local knowledge should be sought out; and local ingenuity should be supported.

We, in Bantry Bay, have had previous experience of a community-based model such as this, where all local stakeholders were connected in the management and stewardship of our marine environment: the Bantry Bay Coastal Zone Charter (see <https://bantrybaycharter.ucc.ie/>); and we would recommend this model as a paradigm which could be followed for all of Ireland's coastal communities.

The coastal communities that live on our shores need to be placed at the heart and centre of our National Marine Planning Framework; after all, who else will use our seas?



Some Specific Objectives and Considerations

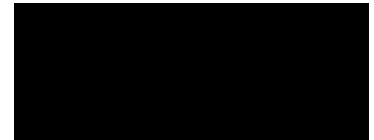
The *Bantry Bay -Protect Our Native Kelp Forests* campaign group is supportive of the following objectives and considerations in the development of the NMPF.

- Forming an ecosystem-based approach to planning that involves maintaining the health of all parts of the marine ecosystem as the highest priority.
 - Do not rely on baseline data surveys that only make note of easily visible marine life at a specific location at a specific time.
 - Do not rely on monitoring schemes that only calculate the difference in numbers of species seen at a specific location at a specific time to that noted in baseline data surveys.
- Banning mechanical extraction of wild native seaweeds anywhere within our territorial waters.
 - Such as the damaging, proposed extraction of 1,860 acres of wild kelp forests in Bantry Bay by Bioatlantis Ltd.
- Introducing incentives to encourage the development of seaweed farms.
- Introducing incentives to encourage multi-trophic aquaculture developments that exist in harmony with the natural ecosystems around them.
 - Such as combined seaweed and mussel aquaculture.
- Developing community-led planning which involves the local community of a bay or coastal zone in all aspects of the plans for its use.
- Re-instating the Bantry Bay Charter which was a pioneering venture of public participation and consensus decision-making in coastal zone management.
- Prioritizing non-damaging human uses of the marine environment such as tourism, sports, recreation, marine biology research, education, seaweed aquaculture, and traditional small-scale harvesting.
 - For example, the creation of more blue-ways.
- Seriously considering the imminent effects of climate change on all aspects of the marine environment as well as the human uses thereof.
 - Rising sea levels
 - Ocean acidification
 - Severe weather events such as storms and hurricanes.
 - Increased coastal erosion.
 - Increased continental shelf currents.
 - Proliferation of invasive, non-indigenous species.
 - Increased pressure on struggling, endangered species.
- Prioritizing the use of seaweed farms as an important form of carbon sequestration.
- Becoming a leader, as an island nation, in the earnest protection of our marine environment.
 - Increasing the area of MPAs.
 - Increasing funding for marine ecology research.
- Protecting our underwater archaeology and heritage by putting into place new measures to protect known sites, educate the public about our underwater archaeology and marine heritage, and significantly expand research into both known and unknown sites.



We thank you for the opportunity to contribute to this important process, and look forward to continuing engagement to assist you in the development of a world-class NMPF for Ireland.

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