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Clare Public Participation Network/Clare Environmental Network submission to the Department of Housing, Local Government & Heritage as part of the public consultation on **‘Expanding Ireland’s Marine Protected Area Network’**

Submission made via email to marine.env@housing.gov.ie

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Clare PPN (CPPN) is a network of 318 community, voluntary, environmental and social inclusion groups from Clare. It exists to facilitate the formal participation by the community sector in Clare Co Co’s policy making structures and to support communication and information sharing in the community and voluntary sector in Clare. It is funded jointly by the Department of Rural and Community Development and Clare Co Co but is autonomous and its activities are directed by its members through an elected secretariat. Clare PPN’s website is www.clareppn.ie and we are on twitter [@clare_ppn](https://twitter.com/clare_ppn) and <https://facebook.com/clareppn/>

Clare Environmental Network (CEN) is both a member group of Clare PPN and a network of environmental groups, individuals and organisations in the County. It exists to facilitate those working on diverse aspects of Climate and Biodiversity Emergency mitigation, environmental sustainability, biodiversity enhancement, sustainable farming and tourism to communicate and collaborate with each other.

Clare Public Participation Network and Clare Environmental Network welcome this opportunity to respond to the expert report on 'Expanding Ireland's Marine Protected Area Network'.

The ocean contains unique biodiversity, provides valuable food resources and is a major sink for anthropogenic carbon. As a county surrounded on three sides by marine areas, Clare has always looked to the sea, socially, culturally, economically. The Atlantic Ocean, Shannon Estuary and Galway Bay are of huge importance to the life of Co Clare, in terms of tourism, sports, leisure and fisheries.

CPPN/CEN members are acutely aware that our seas are now at crisis point, following years of harm from super-trawlers, aquaculture, oil and gas exploration, plastic and noise pollution, to mention just some of the threats to our precious marine life. Our members regard marine protection as an urgent priority.

The Irish Wildlife Trust (IWT) has warned that Ireland's marine environment is under "immense pressure", with many species facing population decline or even extinction. One-third of shark, ray and skate species are threatened with extinction and another third is near-threatened, many seabird populations are declining, estuaries are becoming more polluted and habitat loss is widespread.

Since 2011, the Irish Whale and Dolphin Group (IWDG), based in Kilrush, Co Clare, has recorded a steady increase in the number of dolphin strandings along the Irish coastline, with 2021 set to become the worst year on record. Entanglement in fishing gear and acoustic trauma are the two causes of death of most concern.

Ken O'Sullivan, an award-winning ocean wildlife film-maker based in Lahinch, Co Clare and a long-time advocate for marine protection, spoke recently about the devastating decline in fish stocks in Irish waters, but also gave cause for hope with respect to marine protected areas. "The great thing about nature is if you leave it alone, it recovers. It might take a while but it will recover and then fish start to thrive and they spill over into other areas. It's a win-win for everybody."

Marine protected areas (MPAs) are an effective tool for restoring ocean biodiversity and ecosystem services. According to a study, [published in the journal 'Nature' in March 2021](#), a substantial increase in ocean protection could have triple benefits, by protecting biodiversity, boosting fisheries yield and securing marine carbon stocks that are at risk from human activities.

Clare PPN/CEN members attended online 'town hall' meetings on the topic of the MPA report, hosted by the Irish Wildlife Trust in spring/summer 2021. It was clear from the contributions that people want to have their voice heard and to be part of the process of designating MPAs.

- CPPN/CEN welcome the expert report, ‘Expanding Ireland’s Marine Protected Area Network’. The report is a crucial step towards safeguarding more of Ireland’s diminishing marine life that must be acted on swiftly by the Government.
- CPPN/CEN support most of the recommendations in the MPA report.
- In particular, we welcome the report’s emphasis on public participation and stakeholder participation (section 3.2) and we support recommendation 3.12 that:

Early and sustained stakeholder participation should be integral to the processes of designating and managing MPAs and is an important factor to foster societal stewardship at a local level.
- CPPN/CEN agree with the Irish Wildlife Trust (IWT) and other advocates that the figure of 30% of Irish waters being designated as MPAs should be an absolute minimum target for 2030.
- CPPN/CEN submit that nine years is too long to wait – Ireland’s MPAs must be increased from the current 2% much sooner than 2030. Thus, we support the IWT’s recommendation that at least 10% of the Irish marine region be designated as protected areas by 2025.
- CPPN/CEN demand immediate action to protect existing Special Areas of Conservation (SACs) and Special Protection Areas, for example the SAC in the Shannon Estuary. While the Shannon Estuary SAC is designated for bottlenose dolphins, the dolphins’ food source, sprat, continues to be fished on an industrial scale within the SAC. The presence of larger vessels trawling for sprat in the Shannon Estuary has been highlighted several times in recent years by Clare-based environmentalists.

This highlights a problem with the definition of a marine protected area proposed in the MPA report, namely that it includes the word “specified” before the “species, habitats or ecosystems” that should be conserved. The current approach to conservation – for example in the Shannon Estuary SAC – involves protecting specific habitats or species, an approach that has been shown to be inadequate. Instead, we need a ‘whole-site’ approach that protects all ecosystem components, including species and habitats of which we might not yet be aware.

- CPPN/CEN support the establishment of a national body to coordinate the planning and implementation of MPAs, and urge the Government to implement this soon. The co-ordinating body must have oversight of all marine activities taking place inside SACs/SPAs and new MPAs and have enforcement powers. A major concern for CPPN/CEN is that, as in the case of land-based agriculture, sectoral targets are in conflict with environmental protection. Therefore, it is essential that the body that has the authority to identify the MPAs has sufficient independence and scientific rigour.

- CPPN/CEN would like to see more emphasis on the need for “no-take” marine reserves, especially in offshore regions, for ocean recovery. Studies show that the greatest benefits to sea-life are observed in no-take zones or marine reserves which allow no extractive activities. We support the IWT’s recommendation that all MPAs located in offshore regions should be no-take zones.
- CPPN/CEN call for a total ban on industrial fishing, including bottom trawling, in Marine Protected Areas (MPAs), and for this ban to be rigorously enforced. Bottom trawling, a widespread practice in which heavy nets are dragged along the seabed, has a devastating impact on marine ecosystems. Also, by disturbing the seabed, it releases carbon dioxide, thus contributing to climate breakdown. A [scientific study published in March 2021](#) showed that bottom trawling releases 1 gigaton of carbon dioxide annually, as much as that emitted by air travel.
- CPPN/CEN recommend that the Government engage with local stakeholders in Clare and other coastal counties, including fishers and those involved in eco-tourism. There needs to be an emphasis on supporting fishing communities that may be negatively impacted by the designation of new MPAs. A ‘just transition’ is crucial for these stakeholders – and for ensuring the MPA process is successful. While supertrawlers and industrial fishing are the greatest source of damage in our oceans, small-scale, carefully-managed, low-impact fisheries can offer a way forward for our coastal communities.
- CPPN/CEN are very supportive of increasing Ireland’s renewable energy generation. Ireland's offshore and coastal areas offer great potential for this expansion – for example, tidal energy generation in the Shannon Estuary. However, these developments, especially offshore wind farms, risk causing significant harm to our marine ecosystems. The expansion in renewable energy generation must be done in a way that also addresses the biodiversity emergency. It is imperative that Marine Protected Areas are designated before the construction of offshore wind farms and tidal energy infrastructure.

CPPN/CEN echo the concerns raised by the IWDG, in a recent policy document on Offshore Windfarm Development, at the lack of a coherent strategy for the development of our offshore wind energy sector, including a coherent and region-wide assessment of the environmental impacts of windfarm developments on benthic and pelagic habitats and species.

Offshore wind farms are now being proposed in areas of significant value to Ireland’s whale and dolphin species. This cannot be at further cost to Ireland’s already depleted marine habitats and species, in this recognised era of biodiversity crisis.

- CPPN/CEN submit that the MPA designation process must be informed by well-funded scientific data gathering. Greater investment in science will be essential in protecting the sea and in planning developments in the marine environment, particularly in relation to offshore energy.
- CPPN/CEN would like to see much greater protection for kelp forests from large-scale mechanical harvesting. Currently, licenses are granted without suitable environmental assessments. In addition to being a habitat for a variety of marine life, kelp forests store huge quantities of carbon, improve water quality and slow wave action, thus slowing coastal erosion. Removal of kelp – largely for agricultural feedstock – is devastating and difficult to reverse.
- CPPN/CEN are opposed to Shannon LNG, a proposed liquefied natural gas (LNG) regasification terminal for the importation of fracked gas from the US, which would be located on the Co Kerry side of the Shannon Estuary. If the project goes ahead, the Estuary would be visited every year by hundreds of LNG tankers, which are among the largest ships in the world.

The Shannon Estuary is one of Ireland’s most important sites for whales, dolphins, and porpoises. It has been designated as a Special Area of Conservation (SAC) in recognition of its being an important breeding ground for the bottle-nosed dolphin. It is Ireland’s only SAC for dolphins. The Shannon LNG jetty site specifically is a breeding area for this species. The Estuary is also an EU-designated Special Protection Area (SPA).

The most serious environmental concern is that up to 100 million gallons of chlorinated seawater, used to raise the temperature of the liquefied gas and revert it to gas form, would be pumped into the estuary daily, causing serious environmental damage to this SAC area. The withdrawal and discharge of huge volumes of seawater would affect marine life by killing ichthyoplankton and other micro-organisms forming the base of the marine food chain unable to escape from the intake area. Furthermore, the discharge of 10 to 12 degrees cooler and chemically-treated seawater would also affect marine life and water quality.

The fact that An Bord Pleanála extended planning permission for the Shannon LNG project in 2018, despite its location in an SAC and an SPA, is a damning indictment of how little enforcement there is of Ireland’s current marine protected areas.

Clare PPN and Clare Environmental Network trust that this submission will be given careful consideration by the Department.
