

Response to the draft guidance, on selection and designation of Marine Conservation Zones, in the Northern Ireland Inshore Region.

by the Scottish Environment LINK Marine Taskforce

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In recognition of the shared interest in the adjoining boundaries of Northern Ireland's and Scotland's administrative and management responsibilities for UK territorial waters, members of Scottish Environment LINK's Marine Taskforce welcome the opportunity to contribute comments on the draft guidance.

To echo our colleagues at the Northern Ireland Marine Taskforce, we would like to commend the Northern Ireland Government and its Department for Environment for the work carried out to date towards securing the sustainable management of Northern Ireland's marine environment.

We would like to comment on the following areas that are of most relevance to an analogous Scottish experience. We also wish to highlight the essential requirement for trans-boundary collaboration between all UK administrations.

Ecological coherence

Key considerations of ecological coherence (replication, viability, representivity, connectivity), are essential to developing a shared vision at UK level to meet OSPAR requirements. It is noted that a complete UK-level evaluation of ecological coherence of a MPA network will not be possible until the UK Government and the devolved administrations have designed - and designated - their respective MPAs (or MCZs where that terminology applies). We share the expert opinion of one of OSPAR's own scientific advisors who responded to the Scottish consultation, that '*ecological coherence is a continuum and should be addressed as an on-going policy towards meeting conservation goals and objectives.*' <http://www.scotland.gov.uk/Resource/0044/00441264.pdf>

It is Scottish Environment LINK's firm view that OSPAR outlines a framework for minimum requirements and provides best practice guidance as to how progress toward ecological coherence can be assessed. Concern has been expressed in some quarters that as each constituent administration of the United Kingdom takes a view on the ecological coherence of the network within their own marine boundaries, an 'over-replication' of features within the UK network could ensue. It is Scottish Environment LINK's view that this concern is misplaced and risks failure to achieve the objectives of the UK network. To wait until such time that the various agencies of the UK, Northern Irish, Scottish and Welsh governments can establish what their respective contributions to the network 'might be' prior to designation decisions would not only risk a delay which threatens the viability of the network as species and habitats continue to decline, but also risks providing the conditions for a *de minimis* approach to designation. Indeed, the legal purpose of the MPA network, as set out in the relevant Marine Acts, is to contribute "to the conservation or improvement of the marine environment in the UK marine area" whilst requiring "that the features which are protected by the sites comprised in the network

represent the range of features present in the UK marine area”¹. The latter point is crucial and merits further emphasis: a network that represents (and indeed replicates) the range of UK marine features is legally required under UK, Scottish and Northern Irish legislation. Additionally, there is widespread policy recognition that such a network would make a valuable contribution to helping secure the many ecosystem services that our seas provide. If features are replicated throughout the network at an absolute minimum, then this is a huge missed opportunity. The greatest benefits will flow if the network effectively protects and enhances our marine ecosystem (see **Benefits** below).

Resilience

We also support Northern Ireland Marine Taskforce’s view that resilience must be explicitly designed into the network. The impacts of - and interactions with – anticipated climate change is important here, as well as the considerations of replication and connectivity outlined in the Northern Ireland Marine Task Force response.

Connectivity

Coordination on connectivity and protection for highly mobile species – including seabirds - and benthic species that have a high larval dispersal distance would benefit the conservation obligations and objectives of the whole Celtic Sea area. Marine species, especially highly mobile ones, can benefit from area-based protection for their important life-history stages, as recognised in the candidate Skerries and Causeway Special Area of Conservation, as well as the Scottish MPA guidelines and proposed Scottish MPAs consulted on in Autumn 2013. The MCZ network development process in Northern Ireland should seek to ensure connectivity with marine protected areas in adjacent waters (initially Scottish pMPAs, English MCZs and pMCZs).

Benefits

A report regarded as the best available approach to value transfer, given the limited evidence and resources available, estimated the benefits arising from a theoretical marine protected area network in Scotland (González-Álvarez 2012²) as £6.3 billion - £10 billion. Whilst there are acknowledged difficulties in this piece of value-transfer work, the report highlights that the value provided by the contribution of a network of Marine Protected Areas to marine ecosystem services is likely to be considerable. Another recent report³ estimating the indirect use value to divers and sea anglers of English MCZs, some Scottish pMPAs and Welsh SACs, estimated that for Scotland, the areas assessed currently provide an estimated £67 – 117 million in annual recreational benefits. Their protection would generate a total one-off non-use value of £125 – 255 million. Although the latter study did not attempt to evaluate the value of marine sites in Northern Ireland, the results from both studies suggest it is likely that analogous benefits can be realised by protecting North Ireland’s marine species, habitats and ecological processes in an ecologically-coherent network of Marine Conservation Zones.

We hope these contributions are helpful to your process.

¹ **s123** in the Marine and Coastal Access Act 2009, **s79** of the Marine (Scotland) Act 2010 and **s20** of the Marine (Northern Ireland) Act 2013

² González-Álvarez, J. (2012). Valuing the benefits of designating a network of Scottish MPAs in territorial and offshore waters. A report to Scottish Environment LINK. Institute of Natural Resources & Spatial Planning at the University of Oviedo, Spain.

[http://www.scotlink.org/files/publication/LINKReports/Valuing_the_benefits_MPA_Network_Scotland_Report_\(final\).pdf](http://www.scotlink.org/files/publication/LINKReports/Valuing_the_benefits_MPA_Network_Scotland_Report_(final).pdf)

³ Kenter, J.O., Bryce, R., Davies, A., Jobstovgt, N., Watson, V., Ranger, S., Solandt, J.L., Duncan, C., Christie, M., Crump, H., Irvine, K.N., Pinard, M., Reed, M.S. (2013). The value of potential marine protected areas in the UK to divers and sea anglers. UNEP-WCMC, Cambridge, UK

<http://uknea.unep-wcmc.org/LinkClick.aspx?fileticket=Mb8nUAphh%2BY%3D&tabid=82>

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