An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage

Independent Analysis and Report

on marine protected area (MPA) public consultation submissions to the Department of Housing, Local Government and Heritage

Context

This report presents an independent review and analysis of submissions received to the public consultation on the expert Advisory Group report entitled "Expanding Ireland's Marine Protected Area Network".

This report has been prepared for the Department of Housing, Local Government and Heritage by the Project Communications unit of RPS Group Ltd.

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DHLGH Marine Protected Area Advisory Group Report

"Expanding Ireland's Marine Protected Area Network" – October 2020

Overview of Public Consultation Feedback   17 February - 30 July 2021

2,311 submissions received
> **1,431** written submissions
> **880** submissions to focused survey

Strong Support & Positive Feedback
> **99%** of submissions supported MPAs
> Strong support for the **30%** MPA coverage by **2030** target

Survey Respondents Agree

89% with the proposed MPA definition

87% with the guidelines for successful stakeholder participation

On expansion of MPA Network

93% support including existing conservation sites

84% support including Other Effective Area Based Conservation Measures

91% support the key principles for ongoing MPA process

Ambition for MPAs
> Conserve and protect marine habitats and ecosystems
> Large enough to provide adequate protection
> Connected
> Achieve Good Environmental Status
> Enhance water quality
> Protect cultural, social and economic value of marine environment

Meaningful public and stakeholder engagement and involvement are key to MPA delivery
> Coastal / Island Communities
> Environmental Sector
> Fisheries and Aquaculture
> Offshore Renewable Energy
> Tourism
> Ports and Harbours
> Science and Research
> Other Government Departments

Areas for Improvement
> Current 2% MPAs coverage in Irish waters is not on target
> Information and data gaps
> Education and awareness raising

Benefits and Potential of MPAs
> Biodiversity
> Resilience and adaptation to climate change
> Benefits to economy and society
> Recreation and health
> Position Ireland as world leader in MPAs

Calls for
> Urgent Action
> Evidence-based Approach
> Ecosystem-based Approach
> More Research
> More Resources – staff and expertise
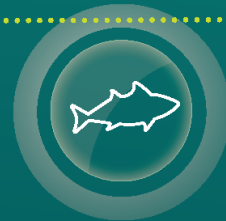> Legislation and Policies working together

Figure 1 - Summary of feedback received to the public consultation

1   EXECUTIVE SUMMARY

In October 2020 the Department of Housing, Local Government, and Heritage (DHLGH) published "*Expanding Ireland's Marine Protected Area Network*" a report by the Marine Protected Area Advisory Group. Between 17 February and 30 July 2021, the Department held a public consultation on that report as part of the process to protect the marine environment through a network of marine protected areas (MPAs).

The public consultation invited all interested stakeholders to share their views and opinions on this report. In total there were over 2,300 submissions received in response to the consultation. The volume of feedback received demonstrates the number of stakeholders and sectors with an interest in the process and highlights the range of competing interests which will need to be considered when expanding the MPA network.

Additional feedback on the protection of our marine environment and coastal areas, which was not directly focused on the Marine Protected Area Advisory Group's report, was provided both in stakeholder submissions and responses to surveys Advisory Group.

This report presents an independent review and analysis of all responses received through the public consultation process conducted in 2021.

Summary of public consultation feedback and responses:

- There was strong public support for the expansion of Ireland's MPA network, with over 99% of submissions received being in support of the MPA process;

- The target of 30% of Irish waters to be protected by 2030 as part of the MPA network was supported; while the current level of protection (at approximately 2%) was not considered sufficient;

- MPAs should be large enough to provide adequate protection, and the network should be adequately connected;

- The Ecosystem-based Approach to MPAs rather than a 'feature based approach' was strongly supported;

- The need for meaningful, early, and timely engagement with stakeholders, particularly fishers, was considered critical to the MPA expansion process. Respondents stated that the role of stakeholders and the general public was central to successful implementation and management of MPAs, and that coastal and island communities and businesses need to be supported throughout the establishment and implementation of any MPA;

- It is important to stakeholders that MPAs are managed with public participation, in order to achieve a high level of protection for marine life, balanced with social and economic requirements. The need for the stakeholder engagement process to be transparent and fair was also emphasised, and responses stated that plans should be put in place to ensure that everyone is able to participate in the MPA process;

- The need for the process to be accessible and clearly communicated to allow for members of the public to understand and engage with it was referenced in responses. The need for clear and comprehensive guidance to enable marine dependent sectors to engage with the MPA process was also highlighted;

- The cultural, social, and economic value of the marine environment was repeatedly emphasised, particularly to coastal and island communities who have traditional and cultural connections to the sea, and which are economically dependent on our marine resource;

- Submissions noted that structures around the coast which form part of the history and culture of Ireland's interaction with the marine environment should be given consideration under the MPA designation process;

- There was broad recognition that MPAs can provide value to coastal communities in terms of eco-tourism, and that opportunities to enhance coastal and marine tourism may arise from the process, leading to economic benefits;

- The importance of achieving Good Environmental Status, enhancing water quality, the protection of marine plant and animal species, and the restoration and / or conservation of marine habitats was emphasised in the submissions received.

- Respondents noted the potential for Ireland to become a world leader in the area of MPA designation, implementation, and management, and emphasised the importance of legislation being put in place;

- There is widespread support for the role of the research sector in the identification, designation, management and monitoring of MPAs;

- Respondents suggested that the MPA process should have scientific backing and be evidence based and clearly defined, with support received for the Systematic Conservation Planning approach proposed in the expert group report;

- Respondents noted that the MPA designation and monitoring process depends on high-quality data. The challenge of addressing significant gaps in data, information, and knowledge on the marine environment was also stressed, and that the MPA process offers a number of opportunities to create and share data and information between stakeholders;

- There was strong support for the proper enforcement, monitoring and management of MPAs to ensure that they are effective in achieving their goals, with respondents outlining support for the establishment of management plans for MPAs;

- The significant resourcing requirements for the effective implementation of MPAs were highlighted, including the need for increased staffing and expertise in the relevant Departments or agencies, and the need for dedicated funding supports to enable proper functioning of MPAs;

- The need for urgent action was expressed, with calls for measures to be put in place in the short-term to support sensitive species and habitats;

- Resilience and adaptation to climate change were cited in the submissions as a key function of the MPA network, noting the role of the ocean in coastal protection, the production of oxygen, and carbon sequestration, as well as its potential for offshore renewable energy;

- Submissions from key sectors, including Fisheries and Aquaculture, Offshore Renewable Energy and Tourism, highlighted the need for meaningful engagement with them as being important towards identifying and achieving MPAs. Furthermore, it was suggested that those who operate in an environmentally friendly manner could be exemplars to support delivery of change towards establishing MPAs;

- The interconnectivity between land and sea came through in submissions, including agriculture, sewage treatment and water quality considerations, and recreation. Feedback also highlighted activities that stakeholders considered should either be restricted, retained, or promoted within MPAs, with examples covering the full range of human activities at sea;

- There was support for the inclusion of existing legally protected sites - such as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) and 'Other Effective Area Based Conservation Measures' (OECMs) as part of the MPA network.

2 CONSULTATION OVERVIEW

2.1 Background to consultation

In the autumn of 2019, the Department of Housing, Local Government, and Heritage (DHLGH) initiated a process aimed at expanding Ireland's network of Marine Protected Areas (MPAs) in the coming years.

An expert Advisory Group was established to provide independent expert advice and recommendations on expanding Ireland's MPA network.

The report of the Advisory Group, titled 'Expanding Ireland's Marine Protected Area Network' ('the expert report') was published in January 2021. A public consultation on the Advisory Group report and the wider MPA process was undertaken was undertaken in tandem with the detailed consideration of the report by the Ministers and Department.
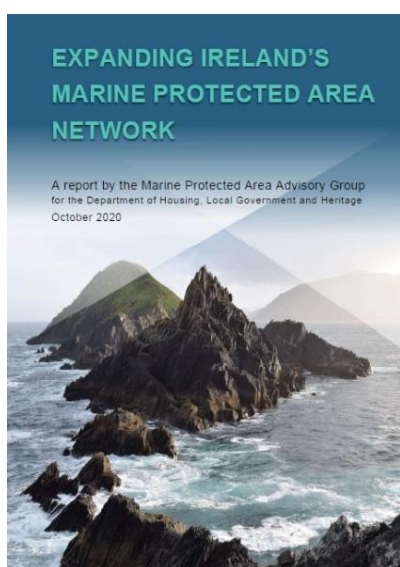
'Expanding Ireland's Marine Protected Areas' – Report by the Marine Protected Area Advisory Group

This report summarises the relevant information and current thinking about MPAs in an Irish context. The report presents the work of the MPA Advisory Group and the outcomes of extensive engagement conducted with stakeholders in the Irish marine environment (including fisheries, tourism, energy, shipping, etc.), Non-Governmental Organisations (NGOs), and Government departments and agencies with an interest in the marine environment. The report set out a proposed definition for MPAs in Ireland, and recommended key principles for their designation and management.

Figure 2 - Expanding Ireland's Marine Protected Area Network Expert Report

This public consultation undertaken in 2021 encouraged all stakeholders and the wider public to get involved in the process by sharing their views and opinions on how Ireland's network of MPAs will be expanded into the future. This document represents an independent review and analysis of all responses received through the public consultation process.

2.2 Consultation process

The public consultation commenced on 17 February 2021 and continued up to and including 30 July 2021.The Advisory Group report and associated documents, including an online questionnaire survey and privacy statement, were available to view online at www.gov.ie/en/consultations.

2.2.1 Feedback channels

Feedback was welcomed through three main channels:

1. A bespoke MPA consultation survey, hosted at https://www.gov.ie/en/consultations. The online questionnaire sought to gather the views and perspectives on specific elements of the Advisory Group report and on the MPA process as a whole. The questionnaire survey form was anonymous but sought basic demographic and occupational information in order to provide appropriate context to the responses that were received;

2. A dedicated email address into DHLGH: marine.env@housing.gov.ie;

3. By post to MPA Public Consultation 2021, c/o Marine Environment, Department of Housing, Local Government and Heritage, Newtown, Wexford Y35 AP90.

2.2.2 Virtual and in-person engagement

A number of focus group meetings, presentations and bilateral meetings were held in order to promote the consultation among key stakeholder groups and the public. Focus group meetings which were facilitated both online and in-person with Minister Malcolm Noonan T.D. in July 2021, and bilateral meetings between the Department and other groups, were also held. Meetings were also held with An Fóram Uisce in April 2021, and IBEC and An Taisce in May 2021. A presentation was also made by Professor Tasman Crowe, chair of the Advisory Group, as part of the An Taisce World Oceans Day event on 8 June 2021.

Table 1 - Summary of focus group and bilateral meetings

Type	Location	Main subject area / affiliation
Focus Groups	Online	*Youth groups, Fisheries and Aquaculture stakeholders, Environmental Pillar organisations, the Irish Environmental Network (IEN) and the Sustainable Water Action Network (SWAN) of Ireland.*
	Killybegs, Co Donegal	*Fisheries and aquaculture*
	Waterford City	*Heritage, fisheries, and community participation*
	Clonakilty, Co Cork	*Conservation and sustainable fisheries*
	Portmagee, Co Kerry	*Tourism and environmental interests*
Bilateral		*Department of Agriculture, Food and the Marine, Department of Defence (incl. Irish Naval Service); Department of Environment, Climate and Communications (incl. Geological Survey of Ireland and Inland Fisheries Ireland); Department of Foreign Affairs; Department of Rural and Community Development; Department of the Taoiseach; Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media; Department of Transport (incl. Irish Coast Guard); Ports and Transport sector organisations and the Irish Wildlife Trust*

2.3 Promotion and communications

2.3.1 Traditional Media

The DHLGH promoted and publicised the public consultation extensively across traditional media, in regional and local newspapers, national newspapers, and in specialist publications targeting marine stakeholders.

The consultation was advertised in local and regional papers across the country twice during the consultation period. As part of the promotion of the consultation radio interviews and advertisements were broadcast. These included an interview with Macdara Ó Cuaig, a member of the MPA Advisory Group, on Raidió na Gaeltachta, an interview with Minister Malcolm Noonan T.D., for a Newstalk podcast and periodic advertisements on national, regional, and local radio stations. All traditional media channels employed in advertising the open public consultation area listed in Table 2.

Table 2 - Traditional media outlets

Medium	Scope	Name
Publication	National	*Irish Times, Irish Independent, Irish Examiner, Seachtain, Sunday Business Post, Sunday Independent, Sunday Times, Sunday World*
	Ulster	*Anglo Celt, Derry People, Donegal News, Donegal Democrat, Northern Standard*
	Connacht	*Connacht Tribune, Galway City Tribune, Mayo News, Roscommon Herald, Tuam Herald, Western People, Leitrim Observer, Sligo Champion, Connaught Telegraph*
	Munster	*Clare Champion, The Corkman, Munster Express, Clonmel Nationalist, Munster Advertiser, The Kerryman, Limerick Leader, Waterford News and Star, Tipperary Star, Nenagh Guardian, The Southern Star*
	Leinster	*Carlow Nationalist, Drogheda Independent, Dundalk Argus, Dundalk Democrat, Enniscorthy Guardian Series, Kilkenny People, Leinster Express, Leinster Leader, Longford Leader, Meath Chronicle, Midland and Tullamore Tribune, New Ross Standard, Westmeath Examiner, Westmeath Independent, Wexford People, Wicklow People*
	Specialist	*Ocean Focus (incorporating Inshore Ireland, Marine Times, Skipper*
Radio		*Beat, Cork 96/103, Clare FM, East Coast FM, FM 104, Galway Bay FM, Highland Radio, iRadio, KCLR, Limerick's Live 95, LMFM, Mid West Radio, Newstalk, Ocean FM, Q102, Radio Kerry, Red FM, Radio Nova, RTE Radio 1, Shannonside, South East Radio, Spin SW, Spin 103.8, Sunshine, WLR FM, 98FM*

2.3.2 Social media

An extensive social media campaign was carried out throughout the duration of the consultation, with advertisements across Facebook, Instagram, and Twitter. A set of three short publicity videos were also produced and circulated by the Department. A strong positive response to the DHLGH social media campaign was received across social media platforms. A sample of these posts and dates of posts can be seen below.

17/2/2021
Public Consultation Launch video, posted on Facebook, Twitter and Instagram

27/2/2021
Photo and call for submissions posted on Facebook and Twitter

1/4/2021
Photo, fact about UN convention and call for submissions posted on Facebook and Twitter

12/5/2021
Photo and call for submissions posted on Facebook and Twitter

8/5/2021
Photo and call for submissions posted on Facebook and Twitter

2/6/2021
Photo and call for submissions posted on Facebook and Twitter

26/6/2021
Photo and call for submissions posted on Facebook and Twitter

3/7/2021
Photo and call for submissions posted on Facebook and Twitter

Facebook/ Instagram
In total throughout the consultation 23 posts on Facebook and 3 on Instagram were posted calling for submissions

Twitter
In total throughout the consultation 22 posts on Twitter calling for submissions were posted

Figure 3 - Overview of social media coverage of MPA consultation

2.4   Participation: Over 2,300 Submissions Received

In total, DHLGH received 2,311 submissions in response to the public consultation. Of the total submissions, 38% were received via the focused online survey, whilst 62% were received by email or post.
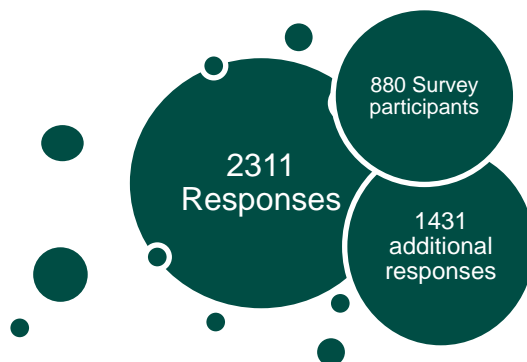
Figure 4 - Total number of submissions made to the consultation

The feedback received to the public consultation is addressed in this report in two parts. Responses to the dedicated online survey, which gathered specific feedback on elements of the Advisory Group report is presented in Section 3. This layout of Section 3 mirrors the structure of the questionnaire, presenting profile information on respondents, followed by the relevant quantitative and qualitative responses.

Section 4 presents a summary of additional written submissions to the consultation. These responses did not necessarily reflect the structure of the survey or may not have been not directly focused on the contents of the MPA Advisory Group's report. This feedback is addressed under a number of key themes, which were common to both the survey responses and the written feedback.

> **Key feedback identified in the additional responses received is presented in green text boxes.**

2.4.1   Submissions from Representative Groups and Organisations

113 responses were received from respondents who affiliated themselves with a group or organisation through the online questionnaire.

Approximately 60 submissions were received via email from representative groups and organisations including statutory bodies, non-governmental organisations (NGOs), community and voluntary groups, research groups, and representatives of the fishing industry. The names of groups / organisations who made a submission to the consultation process are listed in Appendix A.

2.4.2   Individual Submissions

Submissions were received from a diverse cross-section of the public, from schoolchildren to pensioners. 473 individual submissions were received from members of the public via email or post.

2.4.3   Petitions and Group Submissions

The public consultation also received over 880 representations from members of the public that featured the entirety or part of a template submission made available by the Irish Wildlife Trust.

A petition was received from members of the inshore fishing community, with nine signed copies of the petition received.

Six submissions were received from elected representatives at local and national level (in addition to those received via the online survey).

2.4.4   Submissions as Gaeilge

Of the submissions received via the online survey, 2 were received in Irish. 4 additional submissions were received in Irish via post and email.

3 RESPONSES TO FOCUSED SURVEY ON MPA ADVISORY GROUP REPORT

As a core part of the consultation process undertaken in 2021, members of the public and interested parties were encouraged to complete an online survey form developed by DHLGH, to gather feedback on the 'Expanding Ireland's Marine Protected Area Network' Advisory Group report of the MPA Advisory Group.

This bilingual survey was hosted using the online platform *EUSurvey*. Details of the public consultation undertaken, and a copy of the online survey form was available in Irish and English via the following website link: www.gov.ie/mpa.

This anonymous public consultation survey contained a series of 19 questions on the MPA process, in addition to background demographic queries designed to gather feedback and other responses to the contents of the independent MPA Advisory Group report published in January 2021.

As part of the independent analysis presented in this report, survey responses have been considered, analysed and the results are presented in this section.

3.1 Profile Information Received from Survey Respondents

3.1.1 Age Profile of Respondents to the Survey
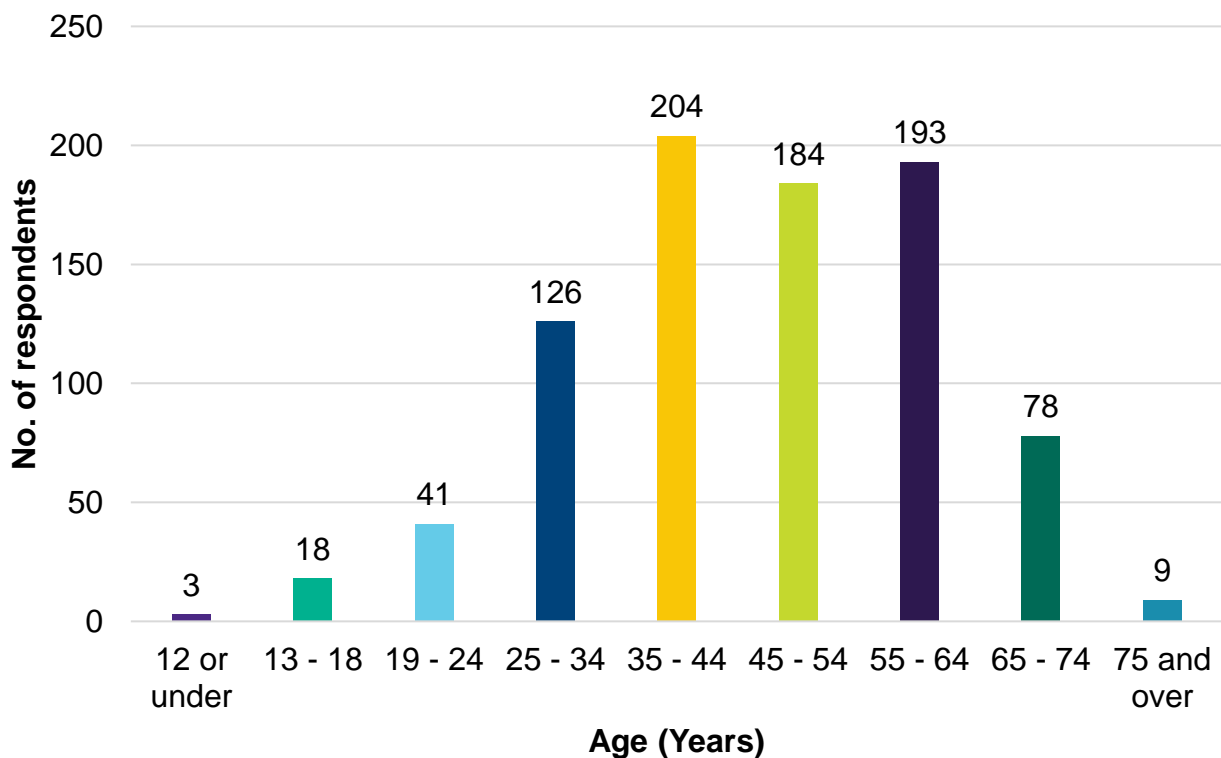
Figure 5 - Age Profile of MPA Survey Respondents

Of the 880 respondents to the survey: 7% were under the age of 25;14% were aged 25-34; 23% were aged 35-44; 21% were aged 45-54; 22% were aged 55-64; and 10% were aged 65 and over.

3.1.2 Gender Profile

Out of the 880 respondents to the survey, 56% identified as male, 41% identified as female and 3% of respondents did not specify their gender.

3.1.3 Responses by Sector

Survey participants had the option to select their sector or area of occupation as well as to provide the name of their organisation if they so wished. 113 organisations were named, and these are listed in Appendix A.
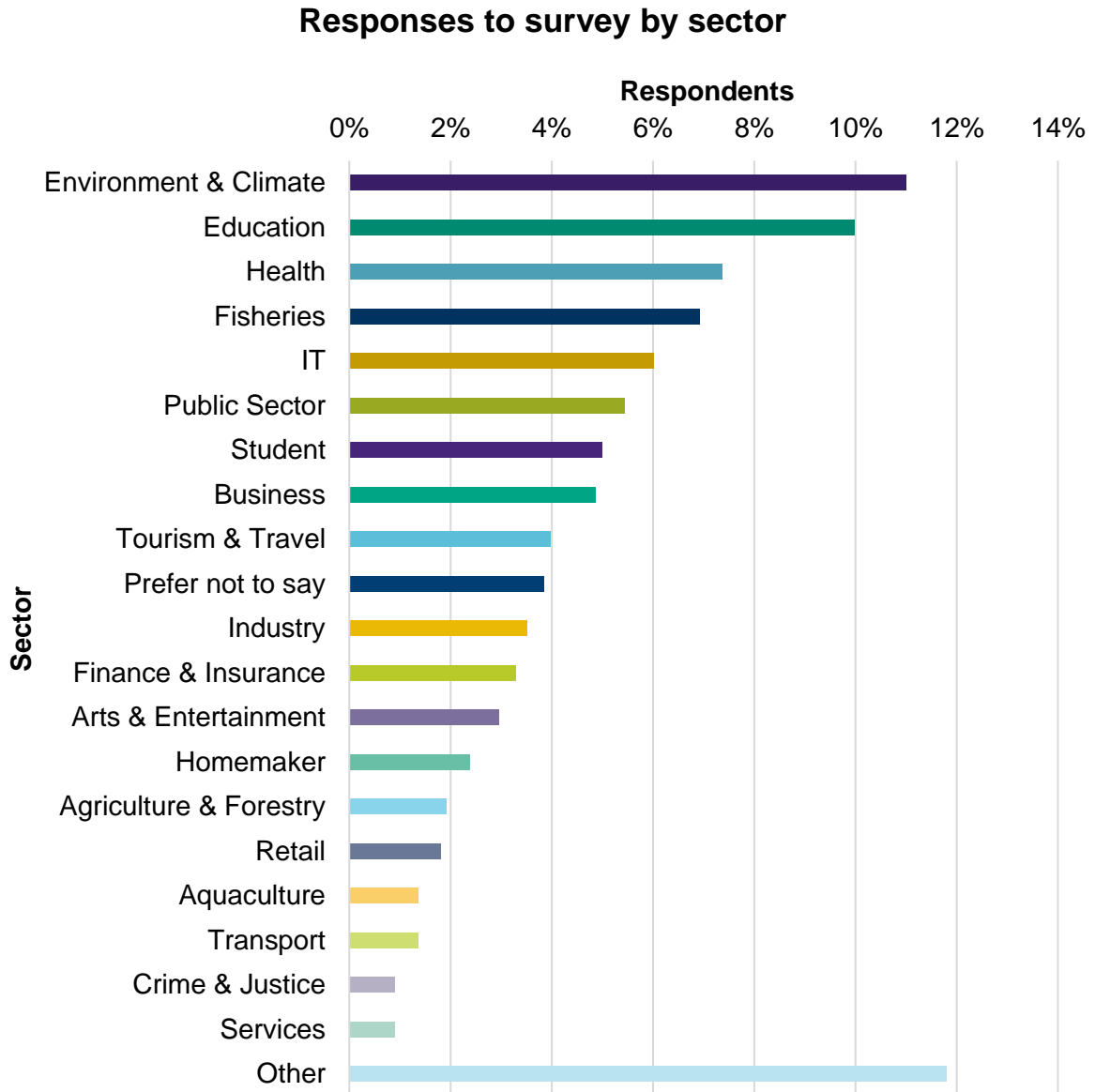
Figure 6 - Survey participants' sector or area of occupation

3.2   Opinions on Marine Protected Areas

Figure 7 - Summary of feedback on what a "good and effective MPA" would be

795 responses were provided in response to Question 1 of the consultation survey, which asked respondents for their opinion on what a "good and effective MPA" would look like. This question provided an open text box for respondents, and asked users to describe "key characteristics or features of such a site" as part of their response.

The diversity of opinions was reflected in the quantity of responses to the survey. The following section highlights the broad categories of responses received to this question.

"***A good effective MPA would be one which …***"

Involves Stakeholders

The requirement for open transparent and timely stakeholder involvement was often raised. Respondents considered that the success of MPAs depends on gaining buy-in from stakeholders, particularly coastal communities who depend on the marine environment. The need for MPAs to be agreed with all stakeholders, and for

Government bodies to "work with stakeholders, including [Non-Governmental Organisations] NGOs, Academic Institutes and Industry partners" was seen as critical to success of the MPA process. Some responses suggested that some stakeholders may require assistance to help them realise the economic and environmental benefits of MPAs.

Supports Biodiversity

Respondents highlighted the value of MPAs in supporting living organisms and habitats as a key feature of a good and effective MPA. Responses in support of biodiversity suggested that MPAs should have a vision and set of goals to help restore and protect ecosystems and resilience of species and habitats and that MPAs should be protected from threats such as "over development or development that will harm […] beauty or biodiversity". Some considered that MPAs should be treated and managed similarly to national parks on land and should be left to "rewild and recover from the damage done".

Considers the Fishing Community

The impact of fisheries on MPAs and *vice versa* was a key factor in how respondents would define a good and effective MPA. Submissions representing the perspective of fishers noted the potential impact on those who

have invested in the sector, are dependent on the sea for their livelihood and culture for example, and the need for their inclusion in the MPA process.

Specific responses relating to fisheries considered that an MPA should be clearly defined, based on sound scientific evidence and that designation with full support and buy-in from the fishing community is essential. General consideration for co-existence included provisions for continued controlled fishing contributing to the protection of stocks, to enable recovery and regeneration of stocks and biodiversity.

It was considered that those who operate in an environmentally friendly way should be used as a model for how it should be done, rather than excluded from MPAs, and that a good and effective MPA is one which would "champion fishermen who responsibly harvest".

Some respondents felt that fishermen with their local knowledge should be the ones to draw up MPAs. Others identified a role for fishers as paid custodians of MPAs and the potential for the retraining of fishermen in other skills to diversify economic activities and reduce dependence on fishing. The potential to establish MPAs on sites where there is no or limited fishing activity to avoid displacement was identified, with some submissions suggesting that there should be no fishing allowed in MPAs.

Takes Account of Terrestrial Activities

Responses noted that MPA designation and management should be cognisant of land-based activities addressing agricultural stakeholders and land management, as well as wastewater and sewage inputs to the marine environment.

Supports the Economy

The importance of MPAs as a driver for economic development was highlighted. It was considered that the socio-economic basis for a MPA should be developed at the outset prior to designation. Respondents submitted that MPAs do not necessarily need to exclude development and can enable "appropriate and compatible economic and social activity", could encourage tourism opportunities, and may provide support to "entrepreneurial ventures".

The strategic importance of national ports and maritime access for trade in or out of the island of Ireland was highlighted, in addition to the need to balance marine conservation with the requirements of the National Port Policy. The importance of small-scale businesses was also stressed with some suggesting prioritisation of low impact business over large scale ventures.

Restricts / Promotes / Encourages Certain Activities.

Many survey responses listed activities which they considered should either be restricted or promoted within MPAs with examples covering the full range of human activities at sea. Submissions noted that the limiting of human activities in MPAs would allow for the protection of the marine environment from threats, including development. Others considered that there should be no displacement or banning of human activities, and that they should coexist with MPAs. It is notable that responses on what should and should not be allowed in an MPA were very diverse and they included views that can be described as diametrically opposed to one another (e.g., exclude human activity vs include human activity).

Promotes Good Environmental Status and Climate Action

Many submissions considered the implications of MPAs for environmental quality and climate action. A number of environmental contamination problems were identified as needing to be addressed, including waste from the fishing industry, litter, human debris, agricultural run-off, light pollution, and untreated water. A number of responses suggested that in order to achieve Good Environmental Status (GES), that MPAs should be free from certain fishing practices, and infrastructure including aquaculture and wind farms.

However, the potential for MPAs to enhance, rather than go against climate action policy was also identified, with suggestions that renewable energy developments including wind, wave and tidal power should be allowed in MPAs.

Some respondents also considered that rivers in proximity to the MPAs should also be considered in relation to how they interact with the MPAs.

Evidence Based and Allows for Research and Monitoring

Several respondents stressed the importance of a robust scientific evidence base for MPAs, noting the requirement of significant features to warrant designation and the need for a clear and specific list of what elements are being protected in MPAs and why.

A variety of responses related to the need for investment in data and research (including citizen science), as well as establishing academic research links. Reasons cited included the need for the establishment of a

baseline and enhanced data to allow for reappraisal of information on MPAs. Responses noted that investment in data gathering can include innovative and cost-effective forms of research such as citizen science and the development of "visual and acoustic research surveys". The development of a well-designed monitoring programme is acknowledged as a crucial part of the MPA process, with consistent programmes to allow spatial and temporal changes to be directly comparable across the network.

Actively Managed with Community Participation

The need for community participation was also considered important, with submissions emphasising active management and community involvement. Responses identified the value of a cooperative, bottom-up approach to management in order to "foster community participation and stewardship [and] increase legitimacy and public wellbeing".

Large Enough / Part of an Extensive Network

Submissions considered the size and scope of the expanded MPA network. There was strong support for the network of MPAs in Irish Waters to reach 30% coverage by 2030 as a minimum target. Different elements considered relevant to achieving this goal included: MPA size, connectivity between sites, coverage of varied seascapes, and inclusion of buffer zones around MPAs to address their impact on surrounding areas. Submissions also suggested the inclusion of sand and mud flats, sea caves, reefs, estuaries and large/shallow inlets and bays, inland waterways, and native flora.

Responses said that the need for the MPA process should take account of existing infrastructure such as wind turbines and aggregate expansion in order to minimise loss of activity, as well as areas of natural beauty and historic importance.

Is Clearly Defined

Responses considered the necessity for MPAs to be clearly defined and easily identifiable on mapping and navigation charts and systems used by all relevant industries. It was suggested that known landmarks, islands, rocks, and other features could be used to identify boundaries.

3.2.1 Proposed Operational Definition for MPAs in Ireland

The expert Advisory Group drew on global, regional, and national expertise, experience, and evidence in order to develop a definition of what an MPA could be:

> **Proposed operational definition of an MPA from the expert report:**
>
> A geographically defined area of marine character or influence which is protected through legal means for the purpose of conservation of specified species, habitats or ecosystems and their associated ecosystem services and cultural values, and managed with the intention of achieving stated objectives over the long term.

Question 2 of the survey asked respondents whether they "agree or disagree with the **proposed operational definition for MPAs** in Ireland."

Do you agree or disagree with the proposed operational definition for MPAs in Ireland?
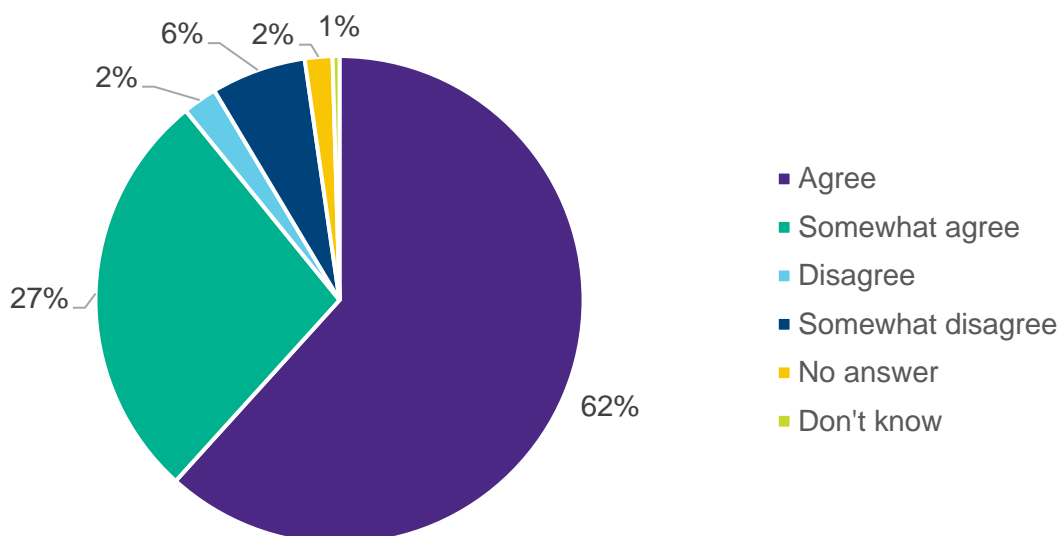
Figure 8 - % of responses which agreed or disagreed with the proposed operational definition for MPAs

89% of respondents agreed or somewhat agreed with the proposed operational definition for MPAs.

8% of respondents disagreed or somewhat disagreed with the proposed operational definition for MPAs.

326 respondents provided additional information to support their answer.

Responses to question 3 of the survey included comments in relation to the proposed definition. These broadly fell into three categories: suggested additions in terms of concepts or language; suggested omissions in terms of concepts or language; and some suggestions regarding clarity of language and terminology.

Additional Concepts and Terminology Identified

Concepts and terminology which some respondents considered could usefully be added to the definition included:

- Making provision for changing geographical areas for MPA over time;

- Emphasising the need for urgency within the definition;

- Concepts such as enforcement, funding, maintenance, guarding and monitoring;

- Identification of activities that will be prevented;

- Inclusion of the "whole site approach" or Ecosystem-based Approach;

- Language to specifically protect vulnerable species and habitats;

- Clearly defined targets and key performance indicators including specific and 'SMART' (specific, measurable, achievable, realistic, and time-bound) objectives;

- To include that a balanced approach will be taken with respect to marine conservation and the sustainable economic growth of Ireland;

- More overt reference to "flourishing, restoration and ocean life";

- That the MPAs will be delivered in a manner consistent with other national policies and frameworks;

- Clarity on the extent and size of the proposed MPAs;

- To include more emphasis on 'people' and stakeholders such as the fishing community, as well as reference to socio-economic objectives to emphasise the importance of garnering support from communities and stakeholders;

- To include more emphasis on the need for underpinning data and using an evidence-based approach;

- The need for greater clarification on the measures which would be introduced to protect MPAs.

Some suggestions for additional terminology and phrases to be included in the definition include: "free from human exploitation"; provision for "public enjoyment", inclusion of "people" and stakeholders and, "based on scientific evidence".

Concepts and Terminology to Consider Omitting

- The use of "long-term" within the definition, as it provides no deadline for the establishment of MPAs, and it is noted that the objectives of MPAs should be achieved both over the short and long-term. Some considered that removal of the phrase would emphasise the urgency of the issue. Responses also noted the need for greater clarity on the timeline for implementation to be included in the definition;

- The 'ecosystem services' concept was questioned citing concern that this may allow destructive human activities to occur in MPAs;

- The term "specified species" was considered by some to be too narrow and that all relevant species and habitats should be considered within an MPA;

- There was some concern at the use of "geographically defined areas" in terms of how it relates to species which may need protection outside of the defined area;

- That 'managed' should be removed from the definition as it was considered to undermine the message of the necessity of rehabilitation of our marine resources before conservation.

Other specific suggested changes included: substituting the word 'conservation' for 'preservation', changing "cultural values" to "cultural and traditional values", and substituting "stated objectives" for "stated conservation objectives".

Clarity of Language

Some concerns about clarity included reference to the definition being open to interpretation or using language that is difficult to understand.

Some responses sought a clear distinction in the definition between the terms 'protect', 'restore' and 'enhance'.

Other specific aspects of the definition considered to be somewhat ambiguous included the phrases: "specified species", "intention of", "ecosystem services", "protection through legal means" and "stated objectives".

3.3 What should Ireland's Marine Protected network include?

3.3.1 Inclusion of existing legally protected marine sites as part of the future MPA network

The report of the Advisory Group recommends the inclusion of existing legally protected marine sites, such as those designated under the Birds and Habitats Directives, including Reserves, Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

Question 4 of the survey asked respondents whether they agree or disagree with this recommendation.

Do you agree or disagree with this recommendation [the inclusion of existing legally protected marine sites]?

- Agree
- Somewhat agree
- Disagree
- Somewhat disagree
- No answer
- Don't know
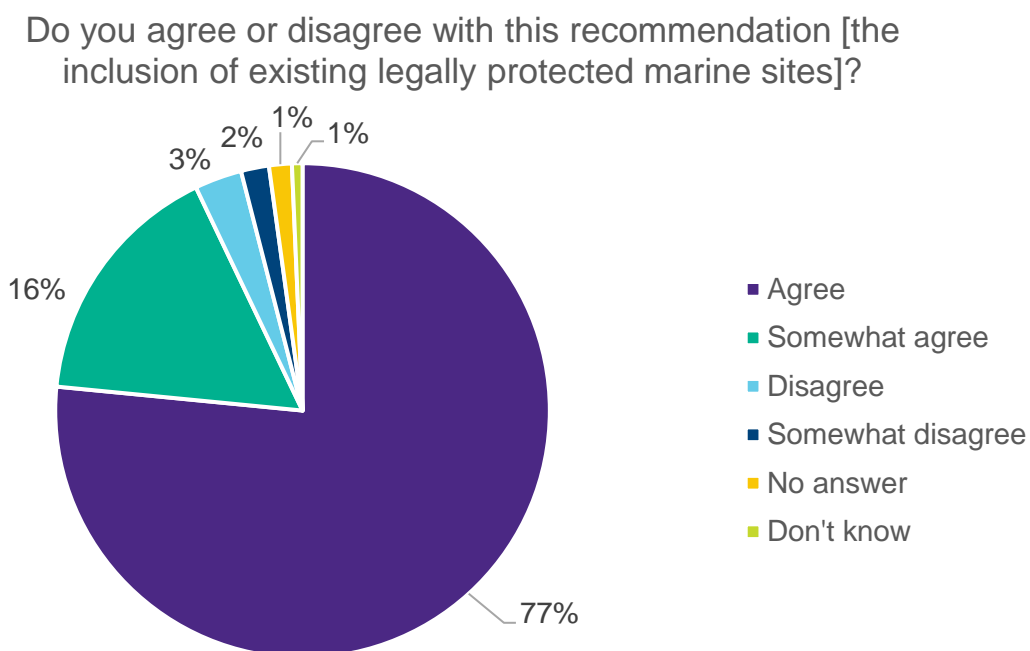
Figure 9 - % of responses which agreed or disagreed with the inclusion of existing legally protected marine sites

93% of respondents agreed or somewhat agreed with the inclusion of existing legally protected marine sites as part of the MPA network.

5% of respondents disagreed or somewhat disagreed with the inclusion of existing legally protected marine sites as part of the MPA network.

216 respondents provided additional information to support their answer.

Question 5 of the questionnaire survey offered respondents the opportunity to provide more information in support of their answer.

There was broad acceptance that existing conservation sites should be included as part of the expanding MPA network.

Specific strengths of this approach were considered such as the fact that that inshore fishing and aquaculture already work effectively and coexist with protected areas; and that, according to some submissions, a significant majority of Irish aquaculture sites already operate within or adjacent to existing Natura 2000 sites and have complied with the associated legislative requirements. It was noted that objectives for protected sites already provide clear guidance for industry and other actors in the marine space.

Some respondents considered the inclusion of these sites "a reasonable and logical approach" and a way of achieving the short-term 10% designation of MPAs in Irish waters. Submissions cited that these sites are already tried and tested under European Union (EU) law and provide "clear benefits in terms of site administration and enforcement procedures, as well as engaging local actors who benefit from existing protected habitats". The opportunity to use the MPA process to standardise legal protections across all protected sites was also supported.

Additional Considerations

Suggestions of sites for additional consideration included sites already monitored under the Water Framework Directive (WFD) such as estuaries, mudflats and coastal bays and marine areas bordering National Parks.

Some responses stated that there is a need to review existing legally protected sites to assess "their effectiveness in protecting the species and habitats they were established to protect as well as whether management measures have been appropriate for stakeholders" in order to establish their "legitimacy" within the expanded MPA network.

Figure 10 - Summary of feedback received on the inclusion of existing protected sites

Some respondents considered that these sites should be included *in addition to* the 30% target, while others considered that preference should be afforded to sites which are currently not protected in order to increase the coverage.

Opportunities

A number of additional opportunities that may arise through the inclusion of existing legally protected sites were also mentioned by respondents, including:

- That new legislation can provide additional protections to existing sites and enhance the legal protection of certain marine species, their nesting, spawning and migratory grounds;

- That if these sites are to be included in the MPA network, the current model of "allowing human activities to occur if they do not impact on conservation requirements" should be maintained;

- The opportunity to integrate the management of marine and land-based sites to ensure that the activities taking place in either area are not impacting the other;

- Opportunities for the existing sites to enhance the network, by improving connectivity and providing "corridors" between sites;

- That increasing the variety of sites increases the chance of success for the MPA network in terms of the species, habitats, and processes to gain protection;

- That extending some of these area-based designations may indirectly benefit many species which use the areas as foraging grounds and nurseries;

- The opportunity for the "blanket protection of these sites", as long as MPA designations "adequately prevent unsustainable and damaging anthropogenic activities, habitat degradation and have adequate protection, with monitoring [and] enforcement";

- Opportunities for "employing and creating jobs in areas for managing / monitoring / guides, etc. for SPAs and MPAs";

- Opportunities presented by the inclusion of certain habitats in existing legally protected areas (e.g., kelp, seagrass, and sandbanks) in the MPA network in terms of their role in climate action and mitigation;

- Opportunities to revisit some of the existing legally protected sites and to amend them to take account of some activities that might be limited by their designation, which may support coastal communities.

Weaknesses

Some weaknesses of the inclusion of these sites were also mentioned by respondents', including:

- That there is considerable variability between the management of existing sites, and that sites should occur within a "unifying framework" of conservation;

- That clarity will need to be provided in relation to how the differing policies, management, and legal requirements, under differing EU Directives, national legislation and international commitments will be integrated and managed;

- That this could become used to relabel existing sites as MPAs to make up a higher area of cover;

- That inclusion of sites should not be used as a reason for inaction on MPAs;

- That there are currently limitations on the legislation in place to protect these sites;

- That there is currently "a significant shortfall in the monitoring and management of these areas";

- That there are many bodies managing existing protected sites which means their aims are often not achieved;

- That there is currently a lack of management plans in SACs and SPAs;

- That many existing sites including SPAs, SACs and Ramsar sites were designated at a time when "the assessment and consultation process were not comparable with current thinking", and that they may not be ideal models for MPAs;

- That there are few restrictions on human activities in these areas already;

- That the proposed inclusion of these sites may result in additional restrictions on economic activities which operate in these areas, threatening livelihoods; and that it is not clear how activities which currently occur in these areas can continue if they are designated as MPAs;

- That they should only be included as part of an overall coherent strategy;

- That the designation of SACs and SPAs as MPAs may come at the cost of other areas which could otherwise be protected;

- That if fishers are to be impacted, provision needs to be put in place to minimise economic losses incurred.

3.3.2 Animal and Plant Species and Habitat Types to be given greater or improved protection through the legal designation of new MPAs

625 respondents provided feedback under question 6 of the survey, which asked if there were any "Animal Species or Plant Species or Habitat types" that should be given "greater or improved protection through the legal designation of MPAs.

23 plant, 258 animal species and 89 habitat types were identified in the submissions, and these are detailed in Appendix B. Figure 12 and Figure 13 provide a graphical representation of the range of plant and animal species and habitats identified in submissions. A number of themes relevant to the development of MPAs arose in the submissions which were common to plants, animals, and habitats as a whole.

Evidence Base

Submissions regarding plants, animals and habitats asserted the need for robust independent scientific evidence and consultation with stakeholders in the establishment of MPAs. Responses noted the need for in-depth scientific research to be carried out to address any deficiencies in data on marine habitats

Figure 11 - Summary of feedback received on species and habitats in the MPA network

and marine plant and animal species and called for increased funding to support this.

Threatened and Endangered Species

The importance of affording greater protection to threatened and endangered plant and animal species, listed in the International Union for the Conservation of Nature (IUCN) Red List was included in many submissions, as well as reference to the knock-on benefits this will have. Specific examples included Angel sharks and Bluefin tuna as well as Blue whale.

Some responses suggested that all marine life in Irish waters be afforded protections through MPAs. Others considered that additional species should only be considered for protection where there is robust evidence to support this and following consultation with stakeholders.

Ireland's unique position to protect and conserve some species was highlighted. Some responses highlighted the potential for the use of the Precautionary Principle and prioritised designation of sites for critically endangered species based on best available information.

Responses also highlighted the impact of non-native and invasive species and the risks that they pose to endangered species.

Ecosystem Connections

Survey submissions stressed the importance of interconnections and interdependencies between different components of the marine ecosystem, the need to support the entire food chain and the need to incorporate ecosystem links into management.

Examples provided included known links between vital prey or "bait species" (including sprat and sand eel) and species of birds and commercially caught fish. The differences in levels of biodiversity between areas and the implications of these differences for management were also considered to be important. The challenges of providing protection for migratory species through MPAs were also highlighted.

The potential to include coastal habitats, such as estuaries (as well as freshwater habitats), may be overlooked and was also raised along with the need for better regulation of terrestrial activities.

Ecosystem Services

The concept of ecosystem services was referenced in responses.

Figure 12 - Most common terms used by respondents in discussing plant species to be afforded protection as part of the MPA network

The importance of plants in regulating atmospheric oxygen and of plants (including algae and marram grasses) and habitats (including cold water corals, soft substrates, kelp forests and reefs) in storing carbon and regulating climate were identified. Some submissions cited that particular species were more susceptible to the effects of climate change and human interference than others.

The nursery functions of habitats for commercial, recreational, and other species were also asserted in submissions. Submissions noted that some commercial fish species are important to the maintenance of the overall health of the environment. Submissions indicated that fishers also provide ecosystem services and are key to the management of wild stocks, with a submission suggesting that "in some instances areas have shown growth in biomass from carefully managed fisheries". The necessity to consider socio-economic impacts of MPAs on fisheries was also emphasised in responses.

Some submissions addressed the impact of human recreation on the marine environment and cited the importance of maintaining and protecting the recreational uses of coastal areas to support mental health and well-being. The provision of access and other facilities to support such recreation were also raised, and protection of marine recreational angling species was referenced.

Sustainability

Several submissions raised concerns about the sustainability of current fishing practices and the potential for MPAs to contribute to sustainability, while simultaneously protecting the environment. The effects of human activities including fishing and infrastructure development on habitats, such as migration routes and feeding grounds for marine species, were highlighted.

Others noted that fishers provide an important role in the management of fish stocks and can contribute to the growth in biomass of wild stocks.

Figure 13 - Most common terms used by respondents in discussing animal species to be afforded protection as part of the MPA network

The need to manage human activities and their resulting environmental pressures within MPAs was raised in responses. Some considered that commercial priorities should not take precedence over the development of the network. In particular, some submissions called for more restrictions of activity within protected sites such as SACs and SPAs that are already established, and these specifically related to different fishing methods as well as aquaculture and recreation.

The need for improved regulation of human activities in marine habitats was highlighted, as well as terrestrial activities that can affect the marine environment.

Climate Adaptation and Offshore Renewables

The need to consider the specific challenges proposed by future development of the offshore renewable energy sector with respect to migratory bird species as well as to the protection of sandbank integrity were raised. Submissions acknowledged the development of renewables as a force for good, but that their development should not come at the expense of vulnerable environments.

Habitats for Inclusion

The inclusion of species listed by IUCN, and sited designated under Ramsar or under the EU Habitats and Birds Directives are recognised as needing further protection. Some submissions also note the potential inclusion of estuaries, rivers, and inland waterways as part of the network, citing concern that they may otherwise be overlooked.

Submissions put forward that different habitats and parts of the coastline differ from a biological diversity perspective and that they must be managed differently in order to preserve each habitat appropriately.

3.3.3 Ecosystem, oceanographic, cultural, or other natural processes or features to be afforded legal protection as part of the MPA network

442 responses were received to question 7 which sought perspectives and opinions on whether respondents consider any "other ecosystem, oceanographic, cultural or other natural processes or features" that should be afforded legal protection as part of the MPA network.

Submissions described cultural aspects that should be incorporated into the MPA process.

Preserving traditional fishing communities was considered an important 'cultural' process that should be protected, and concerns were expressed for the future of fishing communities and their way of life.

There was recognition that "local fisheries not only create employment but also preserve the cultural values of towns and the people who live in them". Submissions also highlighted the preservation of traditional fishing routes, fishing communities, recreational sea angling and fishing knowledge as key aspects of the proposed MPAs. The growing number of marine activities such as Offshore Renewable Energy (ORE) and future development of MPAs were identified as a potential threat to small scale fisheries, as competition for space increases.

Concern was expressed for the preservation of small island communities, their cultures, environmental values and way of life. The

Supports
- Protection of cultural, heritage, and economic activities
- Recognition of the recreational value of the sea

Other processes to be protected

Challenges
- Ensuring economic activities and recreation are sustainable and viable
- Addressing competition for the marine resource between economic activity and MPAs

Calls for
- Preserving the way of life of coastal, island, and Gaeltacht communities
- Consideration of heritage and culture in the MPA process
- Continued protection of traditional economic, recreational, and cultural activities

Figure 14 - Summary of feedback on other processes to be protected

need to support them in attaining a standard of living that encourages young families to remain in communities, especially in Gaeltacht areas, was also noted.

Local community involvement was cited as essential to ensure incorporation of local knowledge (e.g., the naming of rocks along the coastline, folklore) that has been passed down through generations.

Submissions identified the need to protect historic and archaeological sites. These included shipwrecks, ancient burial grounds, offshore islands, Neolithic sites, and Christian ruins, as well as piers, lighthouses, and other manmade structures around the coast, which make up the history and culture of Ireland's interaction with the marine environment.

Submissions noted that rights of way and unrestricted access to the foreshore should be maintained throughout the MPA process, and that recreational activities such as sea-swimming, diving, snorkelling, and kayaking among others should be preserved.

Full ecosystem assessments considering "seascapes and established marine and shoreline usage", were suggested for inclusion in the MPA process.

The impact of extreme weather events on MPAs was also cited for consideration in submissions. It was suggested that this, along with other naturally occurring impacts, such as tides and coastal erosion, be considered through the MPA process.

3.3.4 Inclusion of Other Effective Area-based Conservation Measures (OECMs) as a potential part of Ireland's MPA network

In their report, the Advisory Group describes an additional type of managed site, not necessarily designed with nature conservation in mind, but that can contribute to marine biodiversity and long-term area-based conservation.

Sites such as these come under the broad category of **Other Effective Area-based Conservation Measures** (OECMs) and these could include protected historical wrecks, protected spawning / nursery grounds for commercial species or managed renewable energy sites for example.

> **Other Effective Area-based Conservation Measures (OECMs) – as defined by the CBD 14th COP**
>
> "A geographically defined area other than a Protected Area, which is governed and managed in ways that achieve positive and sustained long-term outcomes for the in-situ conservation of biodiversity with associated ecosystem functions and services and where applicable, cultural, spiritual, socio-economic, and other locally relevant values."

Question 8 of the survey asks respondents whether they "agree or disagree with the inclusion of OECMs as a potential part of Ireland's MPA network".

Based on this information [provided in the survey] and further details presented in the report, do you agree or disagree with the inclusion of OECMs as a potential part of Ireland's MPA network?

- Agree — 573
- Somewhat agree — 148
- Disagree — 52
- Somewhat disagree — 37
- No answer — 35
- Don't know — 15
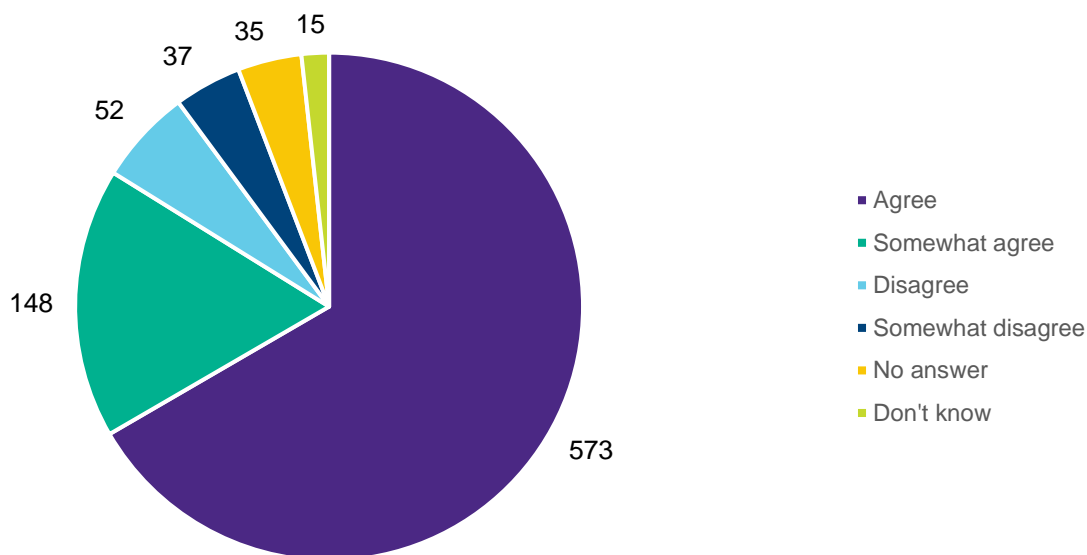
Figure 15 - % of responses which agree or disagree with the inclusion of OECMs as a potential part of Ireland's MPA network
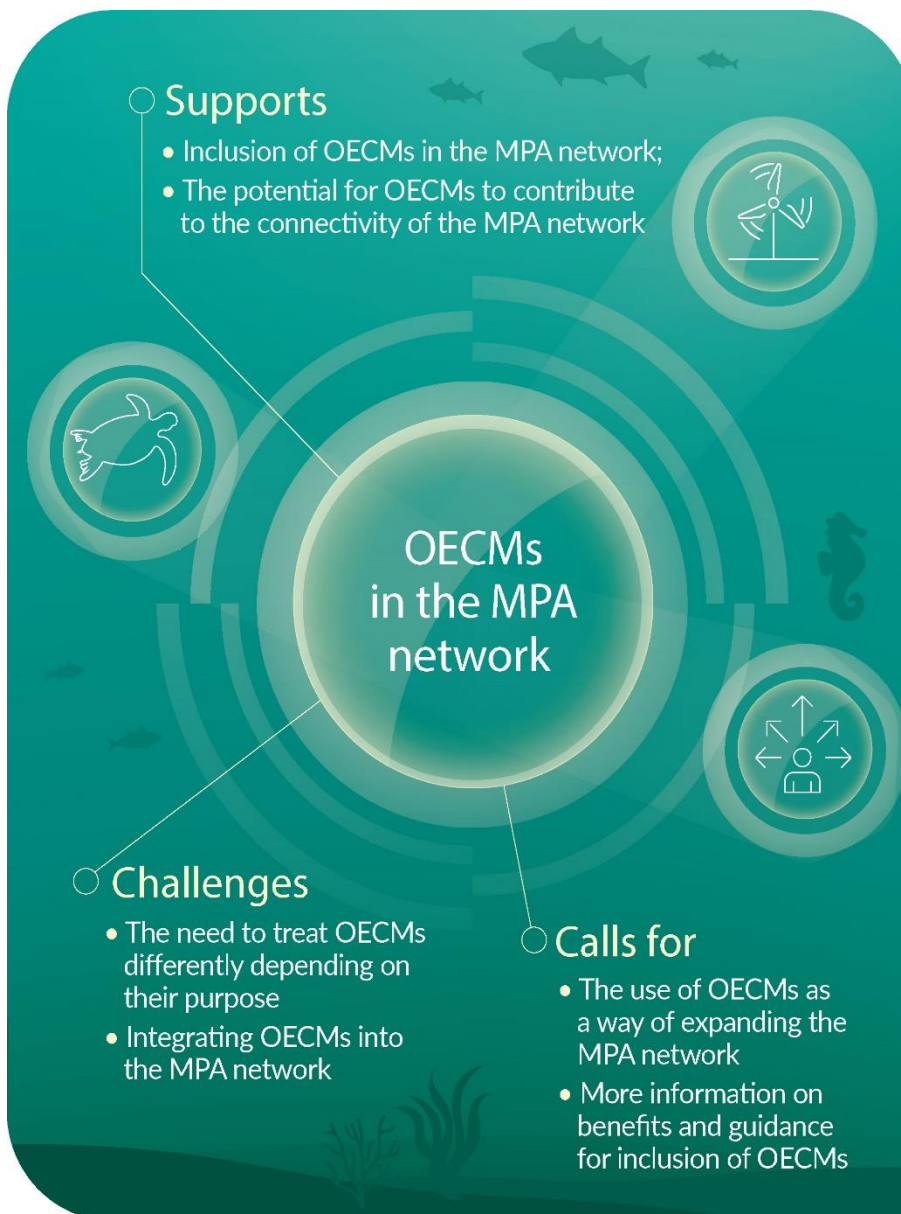
Additional feedback was provided through question 9 of the survey. Respondents maintained that different types of OCEM included fish nurseries or spawning grounds, ORE developments and protected historical wrecks. Feedback proposed that these could contribute to an MPA network and in some cases can be a suitable approach for extending the MPA network. It was also noted that not all OECMs can be treated the same.

Respondents considered it incorrect to put spawning and nursery grounds and shipwrecks in the same category as offshore wind developments (especially during their construction phase) and some submissions raised concerns that OECMs may not be properly enforced as MPAs in the network. Specific responses to the question tended to focus on the relationship between MPAs and ORE, or MPAs and fisheries. Some common opportunities and challenges to the approach were identified in the feedback received.

Figure 16 - Summary of feedback on the inclusion of OECMs in the MPA network

3.3.4.1 Opportunities

Several responses identified that infrastructure, including windfarms (as well as offshore pipelines and interconnectors), can contribute to the coherence and connectivity of the MPA network; and contribute to national energy security and biodiversity policies. Such an approach, it was suggested, could help to achieve additional buy-in from certain sectors and be recognised as a contribution towards corporate social responsibility.

It is suggested that ORE sites could be considered as OECMs in the MPA network if they are designed with conservation goals in mind, where a consented offshore wind site is capable of meeting or achieving MPA objectives for certain target species or habitats, and where management measures are fully compatible with offshore wind operation. The need for long-term monitoring is also considered as a means of establishing evidence-based benefits of ORE to biodiversity.

The concept of OECMs achieving multiple goals was also evident in submissions relating to the fisheries sectors. The responses highlight that fishers have always had demarcated zones for conservation (and questioned whether these needed to be further expanded), that the inshore fishing sector has already co-existed with protected areas for many years, and that the protection of nursery grounds through OECMs could provide an opportunity for stocks to increase.

With respect to historical wrecks, respondents highlighted the need for effective management and enforcement, stating that designations should be based on the protection of their living resources. Others suggested that wrecks should not be no-take fishing zones. The need for conservation objectives and monitoring of potential OECM sites was also raised.

3.3.4.2 Challenges

Respondents mentioned challenges relating to the inclusion of OECMs within the expanding MPA network. Respondents principally focused on potentially detrimental effects of ORE on conservation objectives, particularly on seabirds and other marine animals. Others considered that the inclusion of OECMs could dilute efforts for conservation taking the space for dedicated MPAs, however submissions also noted that conservation efforts should not stop the development of new ORE developments, and that both can be developed in tandem. Concerns were also raised about the inclusion of ORE sites as OECMs, in that they might compete with areas for dedicated MPAs, encourage commercialisation of MPAs, and put industry and profit ahead of conservation.

Submissions noted concern that OECMs will put further pressure on the fishing industry, which does not want to lose any more area for fishing and has concerns that further restrictions will be imposed on commercial fishers. Responses also queried whether the use of OECMs would allow commercial fish nurseries to be included, creating a loophole for the introduction of salmon cages into the MPA network. Respondents noted that where fishing practices may change as a result of designation, then provisions and assistance should be put in place to minimise the socio-economic impact.

Several responses considered that the benefits of OECMs were incidental to and should be distinguished from the MPA process, considered as a separate network to be included in addition to the 30% target, or considered on a case-by-case basis. Some noted that only OECMs with biodiversity conservation as a primary aim should be included in the network.

Some respondents considered that since such sites were already in existence and designated (e.g., historical wrecks as protected structures), they should not be included as part of the expansion of the MPA network. It was also observed in feedback that OECMs are still a relatively new concept, and that more information on their benefits and guidance for their inclusion are needed before they can be considered.

3.3.5 Principles for the process of MPA network expansion

Question 10 of the survey addressed an extract from the Advisory Group report (Section 3.6.1 of the report) outlining a number of recommended principles for the process of MPA expansion, and asked respondents whether they agreed with the recommendations.

Do you agree or disagree with the recommended principles for the process of MPA network expansion?
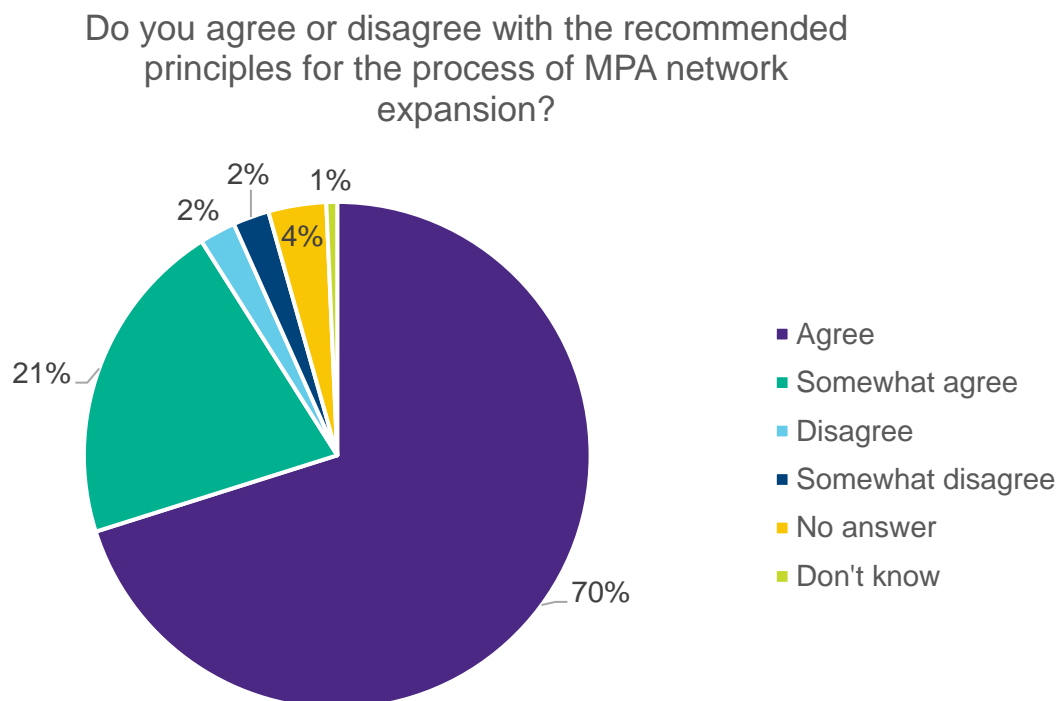
Figure 17 - % of responses which agree or disagree with the Advisory Group's recommended principles for the process of MPA network expansion

91% of respondents agreed or somewhat agreed with the principles for the process of MPA expansion.

4% of respondents disagreed or somewhat disagreed with the principles for the process of MPA expansion.

310 respondents provided additional information to support their answer.

Survey results indicate that respondents were broadly supportive of the principles set out in the expert report. Additional information provided under question 11 includes evidence of a range of differing perspectives on the principles and the process.

Some responses suggested aiming to go beyond present commitments in the context of international instruments, with reference to documents such as the Harnessing Our Ocean Wealth strategy, and the National Biodiversity Plan, and that new MPAs should be established in line with IUCN guidance. Others favoured a targeted approach to individual features suggesting that the implementation of measures should be proportionate to the specific resilience, sensitivity, and condition of each feature, rather than a blanket objective.

A number of ***additions*** were suggested by respondents to enhance the proposed principles for MPA expansion. These suggested additions included:

- Addition of the word "ecologically coherent" to the network description, with an emphasis on aligning the aims of this report with the EU Biodiversity Strategy for 2030;

- Expansion of the second principle to include seabird migration and travel routes, contribution of areas to coastal protection, reference areas, dumping at sea sites, areas of high productivity, river catchments; protections for maritime heritage and marine culture, traditions, traditional users, and animal welfare;

- Targeting of specific pressures based on evidence including impact of terrestrial or agricultural pollution on the marine environment, the impact of invasive species on MPAs; fisheries, pollution, climate change, eutrophication, and consideration of disposal / dumping-at-sea sites;

Figure 18 - Summary of feedback received on the recommended principles for the process of MPA expansion

- Governance considerations including the need for additional resources in order to implement, monitor and enforce the designated sites, acknowledging the role of local government and local authorities. The need for the implementation of effective frameworks for international cooperation as well as clear definition for the role and capabilities of stakeholders from other states was identified;

- Responses identified the need for the development and enforcement of proportionate management measures. It was considered that a national coordinating body should include representation from a number of sectors including small scale costal fisheries, inshore fisheries, aquaculture, and leisure facilities in order to achieve buy-in and establish shared benefit;

- Others were unsure of the need for the establishment of a new body, with suggestions that existing structures including Government departments and state agencies could be reorganised to fulfil the function of this unit;

- It was also suggested that the coordinating body be supported by a marine-data computing system to enable a "rapid knowledge-based assessment" and others noted the need for funding to gather improved evidence to enable the coordinating body to achieve timely MPA implementation;

- Definition of the stakeholder process including defined roles for specific stakeholders and local communities in the engagement and decision-making process, as well as the need for meaningful, early and timely engagement to ensure that it does not become an elite process. The need to develop evidence-based engagement, and the importance of scientific support to decision making are also set out, and the need to support stakeholder capacity to adequately engage with the consultation process through provision of resources. Some responses stressed that citizen science and traditional knowledge should be considered as part of the designation process, and that lay knowledge should also be included in monitoring;

- Improving the resilience of coastal communities;

- Invoking the Precautionary Principle with responses suggesting that it also be applied where establishment of an MPA risks shutting down a business;

- In relation to the prevention of impacts from artificial light, responses noted that the inclusion of Dark Sky Reserves would be welcome but should be in addition to the 30% target, while another noted that this should be an "absolute commitment".

Suggested Omissions

- Some submissions disagreed with the inclusion of the term 'buffer' in the guidance citing their belief that this is "vague and unproven".

Ambiguous Terms

- Responses cited confusion around the use of the term 'naturalness' in the principles, noting that the term is 'unfamiliar' and that all MPAs should be 'natural' by default;

- Some responses suggested limiting the scope to "threatened or declining species and habitats as the other points are "too broad and unsupported".

3.4 How should we expand our MPA network?

This section of the survey asked respondents for their views and perspectives on potential implementation steps and priorities for the delivery of an expanded MPA network and the principles that they consider to be important in terms of the stakeholder engagement process.

3.4.1 Most significant challenges to the implementation of an expanded MPA network in Ireland

626 responses were received to question 12**,** which asked survey respondents to consider the Advisory Group report and to outline what they thought were the most significant challenges to the implementation of an expanded MPA network for Ireland**.**

A number of challenges were identified by survey respondents, these can be broadly separated into four main categories:

Sectoral Conflicts and Stakeholder Buy in

Respondents identified potential for conflict between sectoral interests and industry lobby groups which could affect the MPA process by prioritising the economy over environmental protection. Specific industries mentioned with regard to these included fisheries, tourism, agriculture, and the interests of other EU countries.

Submissions highlighted the importance of considering the views of fisheries interests to address their concerns for displacement of activities, as well as ORE development. This was considered a necessity to ensure buy-in from coastal communities for the MPA process by demonstrating the value of

Figure 19 - Summary of feedback on challenges to the implementation of MPAs

MPAs to communities and to mitigate concern for the erosion of existing marine and coastal activities. Submissions also highlighted the need to raise awareness of MPAs amongst the general public to garner support, including through awareness campaigns and disseminating information on the benefits of MPAs to human life.

Political Support

Responses noted the potential for sectoral conflict between the competing aims of Government departments and state agencies, and the requirement for political support to pass legislation, recognising that securing

support for legislation may be a key political issue. Feedback cited political inertia as a potential challenge to the implementation of the MPA process.

Some submissions stated that the MPA process would benefit from being completed outside of the political domain to ensure objectivity.

Legal Challenge

Submissions identified the complexity of linking MPA legislation to existing policies and frameworks. This included the integration of MPAs with other aspects of marine policy such as planning and fisheries, e.g., the National Marine Planning Framework (NMPF) and the Marine Area Planning (MAP) Bill. Feedback said that maritime law should be expanded to include the powers to enforce areas designated for protection. Some respondents feared that this, combined with the political complexity of the issue, has potential to hamper the development of the legislation and the pace of the designation process. Enforcement challenges were also identified. It is noted that cross-party support will be needed in order to enact appropriate legislation to enable development and management of the future MPA network.

Resourcing

Several submissions remarked on the costs of identification, monitoring and enforcement of MPAs and the long-term financial investment required. Some respondents listed statutory organisations which could potentially have roles in the MPA process and cited funding of these organisations as a potential stumbling block. These included the Irish Naval Service, the National Parks and Wildlife Service (NPWS), Inland Fisheries Ireland (IFI), the Environmental Protection Agency (EPA) and DHLGH.

3.4.2   Adoption of a Systematic Conservation Planning approach

Section 2.3.4 of the advisory group report recommended the adoption of a Systematic Conservation Planning (SCP) approach for the planning, implementation, and management of the expanded MPA network, with scope for individual site proposals. Question 13 of the survey asked whether respondents agreed with the SCP approach recommended by the Advisory Group.
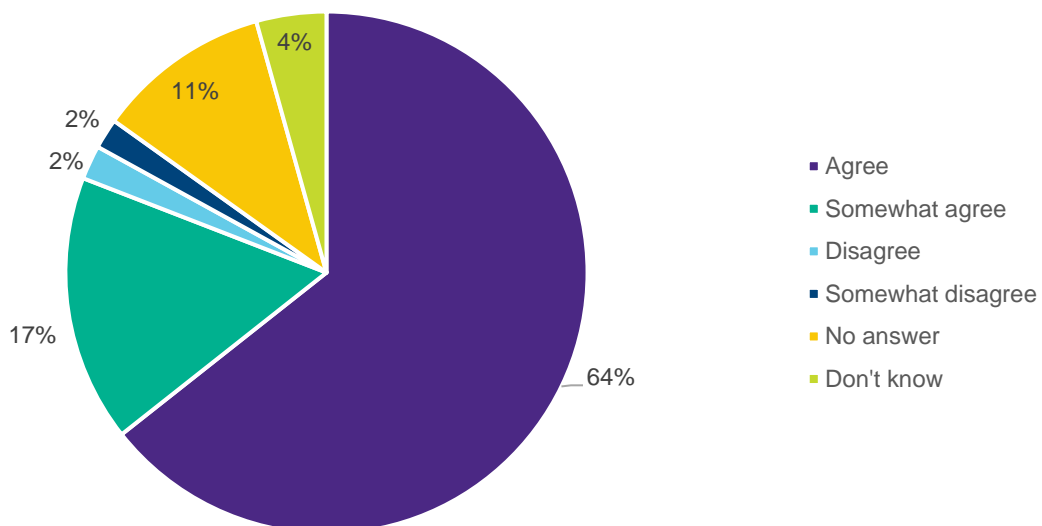
Figure 20 - % of responses which agree or disagree with the SCP approach

While the responses to the survey showed broad support for the SCP process, respondents provided additional information through question 14, including concerns relating to how aspects of such a process would be implemented in practice, while other responses considered additions, omissions, or concerns about sectoral impacts.

Supports
- The adoption of the Systematic Conservation Planning (SCP) approach
- Application of the approach to other sites

SCP approach

Challenges
- The need for additional financial and other resources to implement the approach
- Effective application of the approach

Calls for
- Effective public communication and stakeholder engagement as part of SCP

Figure 21 - Summary of feedback received on the SCP approach as proposed in the Advisory Group report

Implementation

Several responses focused on the practical aspects of the stakeholder engagement process, stressing the need to include existing marine activities in the engagement process. Other responses stressed the need for clear and effective public communication and education including consideration of various levels of literacy (including digital literacy).

Other comments focused on political and legal aspects of implementation of SCP. Opportunities were identified in terms of applying the proposed SCP to existing Natura 2000 sites, as well as in terms of integrating the approach with national and international policy goals and agreements. The potential to link the SCP and the MPA processes with Maritime Spatial Planning (MSP) and energy policy was also highlighted.

Some responses questioned whether the use of SCP would be effectively applied, with one submission noting that structured plans are not always implemented as designed which can lead to "piecemeal interventions" resulting in "patchy and distorted outcomes". It was suggested that provision to avoid workarounds that may undercut intended protections should be included. Several responses questioned the proposed timescales, suggesting the need to set more realistic timelines. The costs of implementing an SCP approach were queried, and interest was expressed in the budgets and

financial process. Some suggestions considered that MPAs and the SCP should be taken outside the political domain to avoid any actual or perceived conflicts with the political agenda.

The opportunity to use existing best practice rather than developing an entirely new process was also raised, with one response suggesting the use of "off the shelf examples" and existing guidelines rather than developing an entirely new approach.

The need to manage each MPA site differently, depending on cultural and geographic conditions was emphasised in some submissions. Consideration of ecological connectivity and external pressures were also considered important.

Additional Elements Suggested

A number of potential additional elements were identified, these included analysis of socio-economic impacts, risk-assessment, an explicit commitment to research, and an additional preparation step in SCP process. Inclusion of a process to prioritise and fast track critically endangered and endangered species or areas where there are known problems was suggested, as well as provision for restoration (in addition to conservation). Responses noted the need for clear review processes and timelines. It was also suggested that site objectives and management measures could be developed as part of the site selection (rather than designation) process.

3.4.3   Elements or steps to be prioritised over others

280 respondents provided feedback under question 15**,** which considered the SCP approach and asked respondents to offer their views or perspectives on the elements or steps that they believed should be prioritised over others as part of SCP.

Respondents considered a variety of different elements of the approach to be the key priorities, these reflected a mixture of sectoral interests, conservation goals and operational elements. The major themes emerging are summarised below.

Sectoral and Biodiversity Priorities.

Submissions cited competition between the objectives. Some submissions called for consideration of the views of "employment generating sectors", including the port sector and other marine users. Some submissions distinguished between users of the marine resource and those who have an interest in the marine environment but do not depend on it for their livelihoods. Others called for prioritisation of species and ecosystems over socio-economic impacts, as well as the use of the precautionary approach, and advocated the completion of the MPA process before the approval of further developments.

Submissions called for a balanced approach to be considered, giving equal priority to social economic and environmental elements. In the context of these competing SCP objectives, the role of stakeholder engagement was identified as a key priority with a range of stakeholder groups being identified for inclusion in the SCP process including the fishing community, fish producers' groups, fishing representatives' bodies, aquaculture, local communities, the ORE sector, agriculture and forestry, and small businesses in the marine / coastal sectors.

Consideration of the role that MPAs play in climate action was considered as a priority both as an element of the process and to reclaim biodiversity and natural habitat.

Priorities for process

A number of submissions prioritised aspects of the MPA designation and management process, such as the need to develop legal and management frameworks, establish a national coordinating body and ensure adequate implementation, enforcement, and control.

Others emphasised the prioritisation of timely assessment, including ecological assessments, monitoring, appropriate indicator selection and scientific consensus.

Respondents said that the implementation of a framework and / or management system was a priority in order to ensure that designations are adequately implemented, controlled, and enforced. The completion of MPA designation in advance of consents for offshore developments was also cited by some respondents, as well as the need for cost-benefit analysis and use of the Precautionary Principle.

3.4.4 Guidelines for successful stakeholder participation

The importance of stakeholder engagement is outlined in the expert report, emphasising the importance of recognising and understanding differences in personal or organisational interests, and in socio-economic, sectoral, or cultural contexts.

The Advisory Group report set out a number of guidelines for successful stakeholder participation in the MPA process, and question 15 of the survey asked respondents whether they agreed with the general guidelines set out in the report.

Do you agree or disagree with the general guidelines for
successful stakeholder participation
set out in the MPA report?

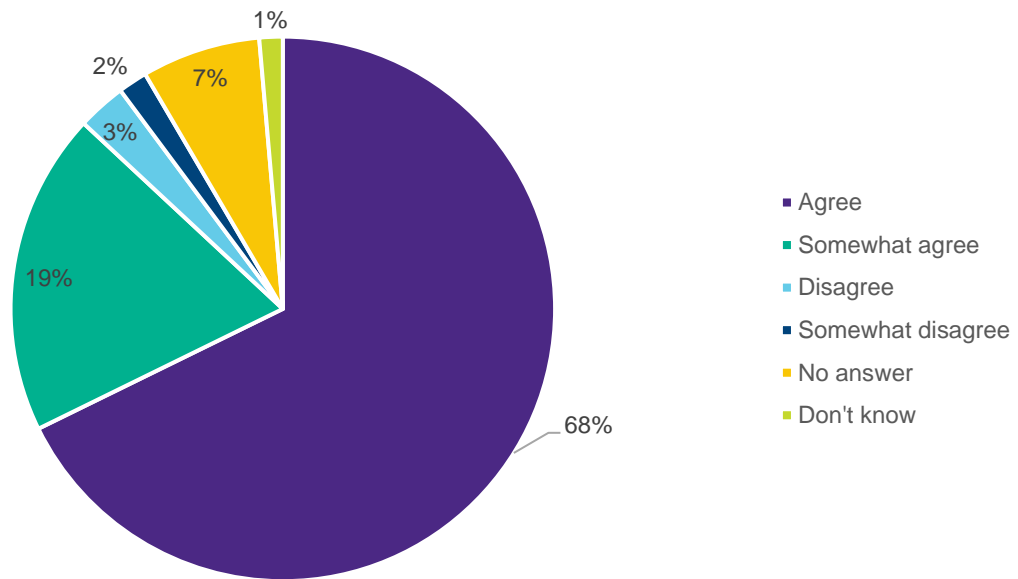**Figure 22 - % of survey respondents who agree or disagree with the Advisory Group's guidelines for stakeholder participation**

87% of respondents agreed or somewhat agreed with the guidelines for stakeholder participation.

5% of respondents disagreed or somewhat disagreed with the guidelines for stakeholder participation.

300 respondents provided additional information in support of their answer.

In response to question 16, respondents provided additional information regarding stakeholder participation, the development of an effective engagement process and the appropriate communication of the process.

Important characteristics of the stakeholder process

The need for inclusive, open, and transparent stakeholder engagement was raised, and submissions identified stakeholder mapping, clear assignment of roles and responsibilities in the process, the necessity for local, regional, and national authorities to be involved, and community participation, as well as the need for scientific expertise to inform the process. One submission suggested that Government bodies should have full responsibility and expert oversight where "community groups lack the necessary technical and scientific expertise to co-manage MPAs".

Respondents highlighted the need to address imbalances in stakeholder engagement and the varying capacity of stakeholders. It was considered that the

Supports
- Open and transparent stakeholder engagement
- Community level participation
- Consistent and timely engagement

Guidelines for stakeholder participation

Challenges
- Ensuring equitable engagement
- Making the process accessible to all stakeholders

Calls for
- Targeted education and awareness campaigns
- Communication materials to consider language, literacy and digital capabilities

Figure 23 - Summary of the feedback received on the guidelines for successful stakeholder participation

process should ensure ease of access to resources and acknowledge the varying capacity of stakeholders to participate in the engagement process. Submissions noted the need to consider different literacy levels, and to make materials available to non-English speakers.

The potential to learn from experiences in the designation of Natura 2000 sites was also identified. The necessity for transparency in relation to lobbying efforts was also raised, as well as the necessity for specific and focused engagement with the fisheries sector and work under the NMPF. Submissions also noted the importance of "community histories, local customs, seafaring wisdom and traditional knowledge" in the MPA process. One submission noted the need to consider the voice of organisms and wildlife as stakeholders.

Several respondents indicated that long timescales are necessary for effective engagement, however it was also suggested that time limits may be needed to avoid prolonged disputes and undue delays. Some feedback raised that the design of the MPA can change during the stakeholder participation process, however, there was some concerns that "short term economic pressures would adversely affect any longer-term considerations for conservation within MPAs".

Communication and Outreach

The necessity for appropriate communication and education as part of the stakeholder engagement process was widely raised. The potential to use existing awareness raising networks (e.g., the Irish Ocean Literacy Network, non-government networks both national and international) to facilitate active management and participation and maximise public engagement was highlighted. The need for clear and understandable language to be used in all communications was noted as essential for effective communication, as well as ensuring ease of access to data and information. The need for targeted education (including in schools and third level education) and capacity building, as well as media campaigns to raise public awareness and improve engagement with the process were also identified. Submissions considered the potential for the use of traditional media and social media as part of an effective campaign.

3.4.5 Additional Comments

Figure 24 - Additional comments received to the focused survey on the Advisory Group Report

280 survey participants included additional comments under question 17 to supplement the answers they had provided in the survey.

Comments raised under this section can be broadly divided into a number of different themes, these included roles and responsibilities of stakeholders in the MPA process (and their inclusion in the Advisory Group report), sectoral and group concerns in the MPA process (and their inclusion in the report), as well as concerns about the environment and effective management of MPAs. A number of opportunities were also identified as follows:

Roles and Responsibilities

Submissions identified a potential role for the Defence Forces, Naval Service, Air Corps, and local authorities within the process as well as the potential for the establishment of a "Wildlife Crime Unit" with a role in enforcing MPAs. The role of the Department of Education and Skills in the MPA process was identified as an omission from the Advisory Group's report, as it "provides the greatest interface between all those involved in the process of expanding Ireland's MPA network and the citizens / communities of tomorrow".

The need for active, participatory management at community level and for the development of management plans for MPAs was reemphasised by respondents.

Sectoral and Group Interests

Various sectors and groups considered that their sector was not sufficiently represented within the report or could be side-lined or lose out during the designation process. These included the fishing and aquaculture

industries, industries such as seaweed harvesting and processing, recreational activities (including boating, kayaking, surfing, windsurfing, swimming coastal walking and nature watching as well as shore fishing) and the emerging marine biotechnology sector. Submissions also raised concerns that there might be a disproportionate impact on smaller vessels who rely on inshore fishing.

Island communities and cultures were identified as being particularly dependent on the marine environment - both economically and culturally. At a national scale, respondents were concerned that coastal communities could lose out to wider interests and at the international scale there was concern that Ireland may shoulder an unequal burden of responsibility to designate MPAs due to the large size of its maritime territories.

Opportunities

The MPA process is seen as an opportunity to establish Ireland's green credentials as well as providing opportunities to graduates and early career researchers in environmental science as well as science communicators. The opportunity to enhance marine datasets was reemphasised, with a submission noting that this should be a Government responsibility, and that the Advisory Group report should have made more reference to the use of technology such as drones, sensors, image processing and data analytics in monitoring MPAs.

Some responses said that they would have found a more accessible version of the Advisory Group report more useful and easier to navigate, such as a summary leaflet, infographic, or video.

Achieving conservation objectives

A range of submissions related to the effectiveness of MPAs in achieving conservation objectives, the urgency of the need for protection and the observation that there are few well managed MPAs around the world. Some submissions suggested the prioritisation of minimally damaged marine areas. One respondent suggested that coastal areas could be matched to candidate MPAs and designated for protection. Submissions again stressed the urgency of the topic and the need for clear timelines to be established.

4 ADDITIONAL RESPONSES RECEIVED TO THE CONSULTATION

Members of the public, groups, and organisations were also able to make submissions to the Department via email or by post. A wide variety of responses were received on the topic of MPAs in Ireland from a range of groups and organisations, and hundreds of members of the public.

Unlike the survey responses which focused on specific elements of the Advisory Group report, the additional responses received often addressed the subject of MPAs more generally. Each submission received has been individually considered and independently analysed. The following section of the consultation report addresses the feedback in addition to that received through the focused survey under a number of key emerging themes set out in Figure 26 below.

A number of representative groups and organisations made submissions to the consultation, these are represented in Figure 25 below. This Figure does not include submissions made by individuals using a template developed by any organisation. The greatest response was received from NGOs, followed by representatives of industry and business, which included submissions from the ORE sector.

Submissions from groups and organisations
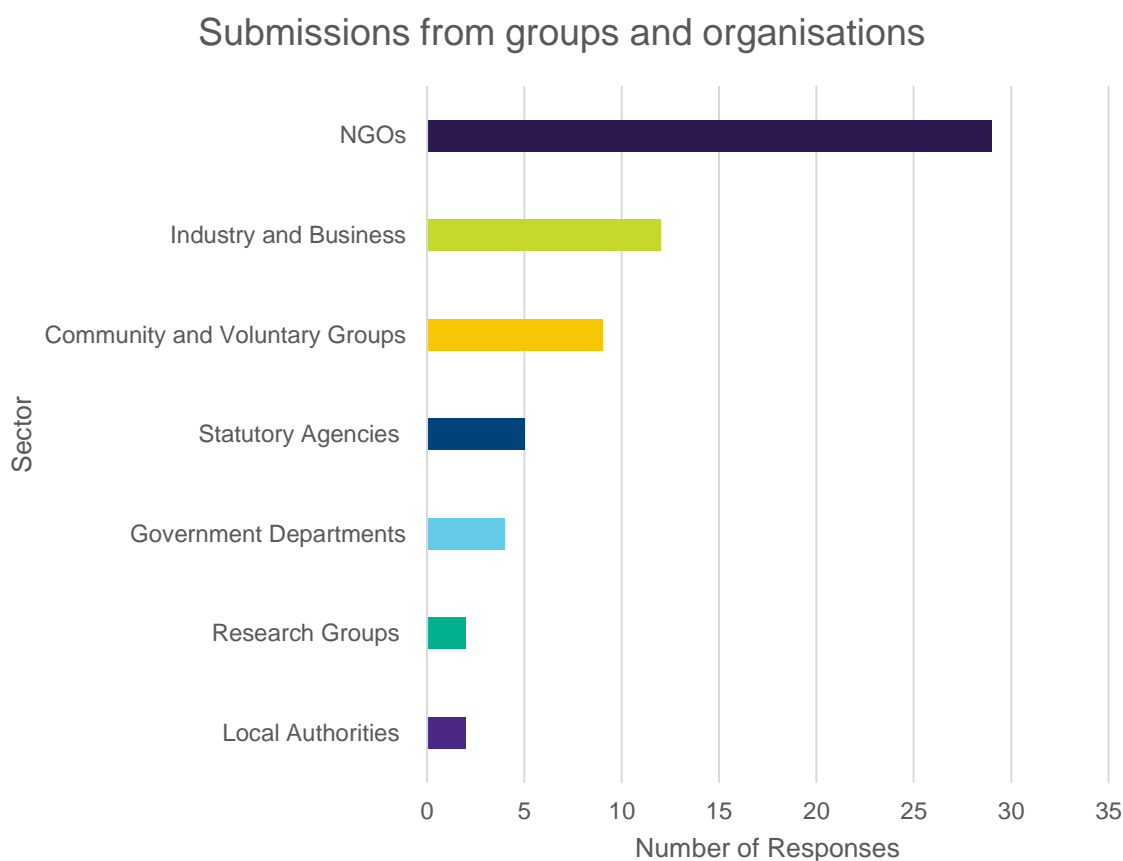
Figure 25 - Responses by group / organisation who made submissions to the public consultation (in addition to those received via the online survey)

4.1 Sentiment of Responses

There was strong support for the MPA process, with **100% of the additional responses received expressing positive sentiment towards the expansion of Ireland's MPA network**.

There were numerous perspectives on how the process should be implemented, including on what an MPA would include and protect, how they would be established, where they will be located, and what activities will be permitted within and around MPAs. This report attempts to capture the range of views expressed based on a set of themes identified through the analysis.

4.2 Emerging Themes

A number of emerging themes were identified, these themes, and the frequency of their occurrence in responses is illustrated in Figure 26.

Frequency of Themes

Theme	Percentage
Environment and Biodiversity	72%
MPAs and Fisheries	69%
Stakeholder Participation	64%
Community / Culture	57%
Spatial Coverage	57%
Implementation	56%
Data / Information	48%
Enforcement	47%
Science / Research	47%
Leadership	20%
Planning	16%
Area Based Measures / OECMs	7%
Economy / Employment	6%
Climate Action	4%
Offshore Energy	3%
Tourism / Recreation	3%
Education	1%

Figure 26 - Frequency of themes raised in submissions

4.3 Environment and Biodiversity

The protection, conservation, restoration, and maintenance of our marine environment are key priorities to be considered in the MPA process.

Biodiversity is key to the overall health of any MPA that is to be established.

Ireland needs to achieve Good Environmental Status (GES) under the Marine Strategy Framework Directive (MSFD).

The impact of human activity on the marine environment is a key consideration as part of the MPA process.

The submissions showed that that the protection, conservation, restoration and maintenance of our marine environment, addressing the 'biodiversity crisis' and climate change, and achievement of GES are key priorities to be considered in the MPA process.

It was asserted that MPAs will play a valuable role in the protection of habitats and species from anthropogenic pressures and will lead to a cumulative, long-term benefits to marine 'Natural Capital'. There was a desire from stakeholders across all sectors to see that MPAs are not only created 'on paper', but that they are actively managed with public participation in order to achieve a high level of protection for marine life in balance with social and economic demands.

Participants acknowledged that the protection of biodiversity is one of the overarching policies of Ireland's first marine spatial plan under the Marine Strategy Framework Directive (MSFD) and NMPF, and that consideration will need to be given as to how MPAs will work within the goals and commitments evident under the EU Biodiversity Strategy 2030.

Submissions identified a range of potential objectives for MPAs including the restoration of natural population structures of species and supporting the functioning of the ecosystem. Some key characteristics to achieve these objectives were identified as size and connectivity. Many submissions dealt directly with existing legal and policy objectives, and these are described in more detail below.

4.3.1 'Good Environmental Status' (GES)

Many submissions identified the need to achieve GES in MPAs, recognising it as an "envelope within which development and activity in the marine must be able to sit for them to be sustainable". The Irish Planning Institute noted that the relationship between the new MPA legislation and the MSFD / MSP processes is essential to achieving GES. Some responses considered that GES should be achieved by being set against a 'true' baseline of a pristine habitat where no human activities occur.

4.3.2 Species and Habitats

Habitats

A submission template developed by the Irish Wildlife Trust and requesting "immediate action to protect SACs and SPAs" was received from over 800 stakeholders. Responses expressed concern that existing obligations for protected species and habitats are not adequately implemented and that this sets a poor expectation for the implementation of MPAs. Respondents cited the results of the latest Habitats Directive report for Ireland, expressing concern that designated sites are in deteriorating / declining condition.

A range of habitats were identified as requiring protection through MPAs including sandbanks, deep water coral reefs, kelp forests and maërl beds. Some submissions suggested the inclusion of wider habitats such as harbours, estuaries, and beach environments in the MPA network. Submissions observed that the restoration of habitats can benefit fish stocks.

Inland Fisheries Ireland cited the fundamental objective of MPAs as to "maintain or improve the ecological state of species and / or critical habitat", and that "designating MPAs is likely to require consideration at an ecosystem, rather than a species level".

Plants and Animals

A diverse range of plant and animal species are referenced in submissions as being a priority for consideration in the MPA process. Respondents noted that many species are associated with vulnerable habitat types, and that the MPA process offers the opportunity to "galvanise protection" for many species. Some responses suggested that MPAs should aim to be a "representative microcosm" of the marine environment and not simply protect rare and endangered habitats and species.

Submissions remarked that the legislation supporting species designated under the EU Habitats and Birds Directives include very few marine species. Ireland was identified as a hotspot for migratory species that should be considered for protection. Some submissions sought interim measures to be put in place using existing legal instruments, citing guidance from the IUCN and concern for the potentially long timeframes for the enactment of comprehensive marine legislation.

4.3.3 Water Quality

Respondents noted that certain marine environments such as estuaries, are facing significant challenges in achieving good water quality status. Submissions suggested that opportunities for improvements in water

quality should be considered as part of the MPA designation process. Irish Water noted that clean and protected waters should be considered "a key goal" in relation to MPAs as they are vital to maintaining a healthy ecosystem, and that "a criterion or objective covering the protection of water quality at high status water bodies [...] through the MPA designation process would add further protection to these areas".

4.3.4 Human Activities / Pressures

A range of human activities and pressures were identified in the submissions. These included the impacts of large-scale physical infrastructure, sound, and light from shipping and seismic surveys (particularly on dolphins, whales, and sharks), overfishing, physical disturbance from dredging and other bottom fishing gears, impacts of aquaculture such as impacts on wild fish stocks, and pollution from shipping including ferries.

Inputs from land-based sources mentioned in submissions as impacting the marine environment included sewage, chemical spills, effluent, litter, poorly kept septic tanks, the impact of increased coastal recreation, and agricultural run-off (e.g., nitrates and other fertilisers). The harvesting of seaweed to feed livestock, reducing its ecosystem value in mitigating climate change and slowing coastal erosion, was also referenced, as well as the impact of aquaculture on the environment. The issue of increased coastal recreation and its impact on the environment was also raised.

Representation from the ORE sector noted that conservation and protection are not incompatible with all types of seabed activity and that a balance can be struck between the two. Submissions observed that there are conflicts between sectoral targets and environmental protection and asserted the necessity for independent scientific rigour in any potential MPA management authority.

4.4 MPAs and Fisheries

> **The importance of fisheries stakeholders to the MPA process, and their support and engagement is critical to its success.**
>
> **The impact of MPAs, particularly on small-scale inshore fisheries, is a key concern.**
>
> **MPAs could benefit fisheries in the short-to-long term, through the recovery of fish stocks and "spill over effect" into neighbouring areas.**
>
> **Time bound fishing closures in MPAs, such as during key spawning events, could help to safeguard the fishing industry and the recovery of fish stocks.**
>
> **Competition for marine space from fisheries, energy, and conservation amongst other activities is a concern for fishers.**
>
> **The impact on coastal and island communities, which are disproportionately reliant on the marine environment economically is a key concern.**
>
> **The MPA process will need to align with Common Fisheries Policy (CFP) requirements and other legal obligations.**
>
> **Transboundary cooperation with other EU Member States is considered essential.**

Importance of the sector and potential for conflicting objectives

Submissions identified that the fisheries sector is one of the most important stakeholders in the MPA expansion process, and that their role is central to the successful implementation and management of MPAs. Responses highlighted the dependency of coastal communities and stakeholders on the fisheries sector, and the "valid fears of fishermen".

The variety of responses summarised potential conflicts facing the MPA designation process. Many submissions called for the complete cessation of bottom trawling and dredging for shellfish in MPAs, with others calling for MPAs to be 'no-take' zones. A large number of submissions reference the banning of what they referred to as "industrial fishing" in MPAs, while others called for strict management guidelines for fishers and increased resources for the removal of fishing waste including nets.

Concern was expressed that members of the fishing community are being unfairly blamed for the condition of the marine environment and water quality, and that as a result they may be unfairly treated during the MPA process, while others felt that it was no longer tenable to support the rights of fishers over the environment.

Concern over potential closure of fishing grounds that would affect the industry, particularly smaller vessels in inshore areas was expressed. It was also hoped that the potential impact of closures would be felt in the short-term and have longer term benefits from "spill-over effects". Representation from the Department of Agriculture, Food and Marine noted that the spill-over effect in temperate Irish waters might only be moderate and that it would be difficult to provide the evidence basis without further research in the Irish context.

Responses suggested time-bound fishing closures, which could be enforced during key spawning events to help safeguard the fishing industry by enabling the recovery of stocks into the longer-term and which could ultimately allow for increased quotas when stock recoveries were evident. Representation from inshore fishers noted the need for MPAs to be evidence and assessment based, with concern raised that designations may be based on "popular opinion", rather than on scientific evidence.

A submission from the Marine Institute noted the need for "improved data on the spatio-temporal distribution of many fish stocks and species" as well as "robust scientific data to evaluate the state of fish stocks".

A number of submissions noted the opportunities for co-existence of commercial fisheries and MPAs. They recognised current high fishing pressures but also the potential for, "long term, sustainable commercial fisheries" and for smaller scale fisheries to be protected as an ecosystem service. Some submissions made technical proposals for fisheries management measures such as increased mesh sizes, management guidelines for activities in MPAs, and promotion and protection of smaller scale and artisan commercial fisheries. A submission noted the potential for "retraining and repurposing of some fishing vessels and personnel to marine tourism" as a way of diversifying employment.

4.4.1 Legislation

A number of regulatory issues were identified including ensuring that "alignment between implementing the Common Fisheries Policy [CFP] in our marine area and environmental protection within the MPAs are compatible, consulted on, and agreed upon by the relevant stakeholders", with some responses citing the lack of engagement with this issue as a failure of the MPA report.

There was recognition of the fact that the designation of MPAs and / or fisheries management will not only affect Irish flagged fishing vessels, but also other European and third-country vessels operating in Irish waters and that the legislative consequence of this needs to be considered.

Other submissions sought more robust conservation legislation and criticised the management of currently protected areas, citing the current lack of management plans in SACs and SPAs and lack of restrictions on fishing and aquaculture activities within these areas.

4.4.2 Balancing Competing Interests

Respondents were concerned that fisheries management in MPAs may potentially have an imbalanced geographic impact on coastal communities. Some responses related to island communities which rely on fisheries as a "central pillar" of their economy. The importance of the in marine environment in sustaining "many small family-owned enterprises and wider island communities" and the "sustainable livelihood of the island-based fishers" was also emphasised.

Concerns around the impact of ORE development were raised, including the concerns of the fishing community about "spatial competition as regards windfarms and MPAs in areas that would otherwise be available for fishing". Responses also stated that in the interests of island economies, the designation of MPAs "must not impede progress of wave and wind energy".

Respondents communicated a "fear" in the fisheries sector that "they are and will continue to be sacrificed to other interests […] with little consultation or assistance to adjust".

Feedback noted that site designation for ORE developments should not take precedence to other considerations with regard to designing MPAs, and that care should be taken to avoid the "de facto privatisation of large offshore areas" to maintain "our natural Blue Commons".

Submissions noted that a "good and effective MPA should have 'blue justice' at its core, where the needs and values of coastal communities and peoples are considered". Other submissions called for a 'Just Transition'

to balance potential negative impacts on coastal communities. This was supported by the submission from An Taisce which noted the need for financial support to communities.

Submissions suggested that the Government should make greater use of EU funding supports such as the European Maritime Fisheries and Aquaculture Fund as part of the MPA process in support of coastal communities.

4.4.3   Aquaculture and MPAs

Responses referred to the economic benefits of aquaculture and noted that sustainable aquaculture can be "beneficial for the marine environment and for the communities who depend on it", and that best practice should be followed. Representation on behalf of island communities noted that many islanders are involved in "small and medium sized aquaculture / biotechnology ventures that demand a healthy environment to be successful and sustainable".

Some submissions expressed concern over the current regulation of aquaculture in protected sites and potential detrimental effects. Respondents used the consultation process as an opportunity to raise concerns about specific developments in their locality. Participants in focus groups organised by the Irish Wildlife Trust noted their concern that their local areas were being "redlined" for industrial development, including wind energy and aquaculture.

Cork County Council noted that designation of MPAs should "encourage and promote growth at existing facilities by allowing an envelope around the facility so the facility can grow organically while protecting undeveloped areas of the coastline and waters, determined by evidence-based data. This should also include existing aquaculture and inshore practices".

4.5   Public Participation, Engagement and Leadership

> **Meaningful, early, and timely consultation will be key to the success of the MPA process.**
>
> **There will be challenges in achieving agreement between competing interests.**
>
> **Stakeholder engagement must be open, transparent, and equitable to ensure the integrity of the process and to help achieve agreement across sectors.**
>
> **Active management and public / community participation in the implementation and management of MPAs is a crucial element of the process.**
>
> **Meaningful engagement with Government departments and statutory bodies including local authorities, regional assemblies, planning authorities and those responsible for the safe disposal of water into the marine environment is essential.**
>
> **Imbalances in stakeholder engagement and accessibility need to be addressed to ensure that everyone has the chance to participate in the process.**
>
> **Additional funding and resources are essential to stakeholder engagement.**
>
> **Communications plans and platforms are essential to raise awareness of MPAs and allow the public to participate in the MPA process.**

Submissions strongly support meaningful, early, and timely consultation with stakeholders as being necessary for the successful implementation of the MPA process. Responses emphasised that the process needs to be open, transparent, and equitable to ensure its success. The submissions indicate that by having strong engagement, stakeholders will have confidence in the integrity of the process.

Responses observed that it will be difficult to gain agreement between all of the interested sectors who have a stake in the process. Stakeholder engagement was highlighted as an opportunity to identify ways for compatible economic activities to co-exist, mitigate spatial conflicts and to reduce the risk of legal challenge

and inadvertent non-compliance. Concerns were expressed over the time required for consultation and how these will line up with the timeframes for national legal obligations.

The value of active management and public participation in the implementation process is continually emphasised in the submissions. It is noted that by facilitating public participation, the legitimacy of the process is improved, and will lead to the establishment of "an empowered public network that can contribute to achieving conservation targets and maintain or improve biodiversity for future generations".

Stakeholder mapping is emphasised in the submissions as an important means of identifying the relevant parties to include in the process. Some relevant stakeholders were identified by respondents. Examples included major NGOs, coastal and island communities, parties who hold authorisations or approvals in areas under consideration as MPAs, Government departments, statutory bodies, local authorities, regional assemblies, planning authorities, and those responsible for the safe disposal of water into the marine environment such as Irish Water, the Commission for Regulation of Utilities, and EPA.

Specific feedback regarding the process included recommendations for the clear definition of the role of each stakeholder in the MPA process, the implementation of pilot schemes, and the use of third-party facilitators as an effective means of undertaking consultation.

4.5.1 Equitable Engagement

Role of Stakeholder Engagement

The responses suggested that stakeholder engagement is essential and noted that a full suite of engagement tools is available to deliver the process. Submissions advocate for a strong communication and participation process, and the "deepening and reimagining" of relationships between communities and the sea, to enable affected communities and individuals to engage in the process.

Concerns were noted regarding the availability of public resources to conduct such extensive engagement. The need for flexibility in public participation and communication are cited as being important as no single approach will suit everyone. There was also recognition of "potential imbalances in stakeholder engagement due to differences in time and digital resources" that could arise. It was also noted that sufficient time needs to be allocated to the process to ensure that it is effective.

Some responses commented on the public consultation process and the format of the Advisory Group report. There was feedback that the report was a useful reference document, while others critiqued its length, technical detail, and scientific language. Concern was expressed that the level of detail in the report had the potential to alienate some readers; and it was felt that a short, accessible summary document / infographic / video would have benefited the process.

Opportunities for Future Engagement

The digital nature of the consultation was considered by some as a barrier to more robust and meaningful discussions. There was hope that following the removal of public health restrictions that there could be a more in person engagement in the future.

Feedback suggested that "engagement should not be solely mediated through commercial actors or interests but that it includes a wider community framing, based on just transition principles and that provides space, support and resources for communities".

Submissions suggested that existing structures such as the Marine Planning Stakeholder Advisory Group could be useful as the as a means of identifying all relevant stakeholders for the MPA process. Transboundary cooperation was also considered an important part of the engagement process. Submissions suggested that transboundary stakeholder working groups should be established which could also utilise existing mechanisms such as those employed under the Good Friday Agreement.

Communications

A number of submissions regarding the role of communications in stakeholder engagement were received. Communications plans and platforms were cited as important in facilitating participation in the MPA process more effectively, and in raising awareness of MPAs among the general public. Submissions recommended that a communication lead be assigned with "expertise in social science and stakeholder engagement" in order to manage and facilitate the process. A national and international publicity campaign was suggested to "signal Ireland's commitment to creating MPAs and actively managing them".

At the national scale the creation of a booklet for maritime users to provide information on MPAs, and admiralty maps updated to reflect their locations for seafarers, was proposed. Responses suggested that information

boards on land could be erected where possible to inform the public of "exactly where the area is, why it is important and the positive impacts of the protection measures".

4.6 Socio-cultural, Economic, Community and Heritage considerations

4.6.1 Community, Culture, and Heritage

> **Many respondents strongly support the introduction of MPAs in Ireland due to their emotional connection to the sea and note that the designation of MPAs will also be an emotive process.**
>
> **Coastal and island communities in particular stand to be potentially impacted by the MPA process, and they need to be supported throughout and after the implementation of MPAs.**
>
> **Sites of historical and cultural significance are important in the marine environment.**
>
> **"Intangible, unwritten and unrecognised aspects of social, cultural and community life" should be recognised as part of the MPA process.**
>
> **The marine environment is important to the Irish economy, and a number of sectors which depend on the marine resource should be considered including the seafood sector, tourism, renewable energy, and the ports sector.**

Respondents, particularly sea-users and coastal and island communities, strongly support the introduction of MPAs in Ireland due to their emotional connection to the sea and noted that the designation of MPAs will be an emotive process. Submissions referred to the ocean as the heart of the community, and that that the ocean and its people are 'inseparable'. Regular sea-users noted that they are amongst those who witness first-hand the decline of marine life. Submissions cited concern for future generation's enjoyment of the marine resource and quality of the environment.

Island communities are noted as needing to be directly involved in the MPA steering group, as they are dependent on the marine space for their survival and rely on the ocean "socially, culturally and economically". Furthermore, the submission from IIMRO noted that engagement with fishing dependent coastal communities is an opportunity for the MPA network to "build resilience explicitly into its structures and organisation by harnessing the knowledge and experience of island and coastal communities".

While some responses noted that MPAs may benefit coastal communities by providing potential economic, social, and cultural benefits, others identified the need for ongoing supports for coastal communities including through grants, retraining for new industries, early retirement pensions, etc.

4.6.2 Heritage

Responses highlighted that the ocean is a significant part of Ireland's heritage as an island nation and that previous generations have relied heavily on the sea, making the seas a major part of our cultural heritage, and giving Ireland an "obligation to care for these precious resources that have given us so much."

Submissions noted that island communities share a "unique and important maritime heritage which stems from, and evolves, directly from their interactions with the coastal and maritime environment". Comhdháil Oileáin na hÉireann noted that local heritage landmarks, *Marcanna na Talamh*, passed down through generations as navigation markers and locations of fishing grounds should be considered when designating MPAs. It is noted that these 'markers' are listed in "Ireland's National Inventory of Intangible Cultural Heritage" and that MPA designation should not disrupt these. Similarly, it was noted that local fishing grounds are important in preserving local heritage and culture. Some submissions noted that sites of historical or cultural significance should be recognised under "biocultural diversity in the MPA expansion process".

The need to protect built marine heritage was also raised. Suggestions included the potential for the designation of an MPA encompassing the Skellig islands (UNESCO world heritage site and key bird habitats), as well as the inclusion of fish weirs, (which can prevent litter from entering the marine environment).

4.6.3 Economy and Employment

Submissions acknowledged the complexity of Ireland's reliance on the marine environment as a source of employment and support to key economic sectors, as well as the likely trade-offs involved in the expansion of the MPA network, where some activities could lose out and development could potentially be constrained or limited. It was accepted that the socio-economic assessment process is likely to be contentious.

Benefits from MPAs

There were mixed views regarding flows of benefits resulting from the MPA process. Some submissions suggested that the process could provide sustainable and secure employment as part of a climate resilient blue economy. A submission from the Department of Agriculture, Food, and the Marine, considered the idea of net benefits flowing from MPAs to be counter intuitive, citing potential negative impacts to fishers. Responses emphasised the potential to reward people to conserve nature rather than exploit it. It was felt that there is potential for job creation and retraining to generate more custodians of the environment in skilled jobs such as teachers, ecologists, and researchers.

It was noted that the benefit of management plans could assist the process of developing and fostering synergies and interdependencies between different sectors and thus reduce conflict.

Sectoral Importance

There were several submissions regarding the importance of and need for early engagement with and accommodation of specific sectors including the seafood sector, transport, ports, and shipping sectors (stressing the obligations of safety at sea) and marine biotechnology. Several submissions highlighted the local economic importance to island and Gaeltacht coastal communities of small-scale fisheries and the apprehension felt by coastal communities about the potential for MPAs to disrupt local activities.

Trade-offs and Valuation

Most submissions identified that there would be trade-offs involved during the designation process. While some submissions called for no restriction on human activities, stating that MPAs should not act as a barrier to development, others suggested that nature and ecology should come before economic considerations. Further submissions (e.g., from Údarás na Gaeltachta) called for balanced decision making based on social, environmental, and economic goals. Submissions highlighted that short term impacts can transform into benefits over time and that there are business opportunities for development in tandem with environmentally friendly management and legislation.

Respondents identified that cost benefit analyses were likely to be contentious, as an example a submission from the Department of Agriculture, Food, and the Marine cited differences in the economic value of the fisheries sector contained within the MPA report €654 million and those contained within a BIM study (estimating €1.1 billion). The potential for ecosystem services concepts to be used in assessing and evaluating trade-offs was also identified. However, some submissions rejected ecosystem service concepts as the monetisation of nature, while others called for payments for conservation of nature. A submission from the Department of the Environment, Climate and Communications asserted that the development of management plans could foster synergies between sectors and reduce conflict.

4.7 Challenges and Opportunities in Implementing MPAs

Management plans are critical to the successful implementation of MPAs.

Active community involvement in the management of MPAs is critical to their success.

There is support for the Systematic Conservation Planning approach to MPAs.

A number of key resource constraints are acknowledged as challenges to the MPA process, with concern that lack of resources and funding may lead to an ineffective process, with support for the establishment of a coordinating body.

Data gaps are a key challenge in the implementation of the MPA process.

Allowing adequate time for a comprehensive stakeholder engagement process is a challenge.

Submissions highlighted the need for effective implementation in order to ensure the success of the MPA process.

Responses noted that the establishment of management plans for MPAs will be essential to ensuring a "fair and balanced outcome" for the process. Management plans are cited as effective ways of ensuring that the objectives of an MPA are met and provide a framework for delivery.

Submissions noted that active community and public management are also crucial to the success of MPAs.

Responses noted that Ireland should take the opportunity to learn lessons from the implementation of MPAs in other countries.

The SCP approach is supported as a means of identifying and implementing MPAs in Ireland. However, responses noted that the lack of coherence between existing and future frameworks is a challenge to implementation, citing discrepancies between the NMPF and MPA designation processes, and noting that the SCP process may be time consuming and will need to recognise the interrelationship between MPAs and other spatially based activity.

Challenges facing the implementation of the MPA process, as mentioned in responses, included: resourcing, conflict resolution, lack of timelines, data gaps, climate change, site identification, legal coherency, political will, objectives, lack of a current designation and difficulties in the enforcement process.

4.8   Spatial Coverage of MPAs

> **The target of 30% spatial coverage of MPAs by the year 2030 is strongly welcomed.**
>
> **MPAs need to be large enough and adequately connected to each other to deliver benefits.**
>
> **The dynamic nature of the marine environment needs to be considered when designating MPAs.**
>
> **Ireland will need to work with neighbouring jurisdictions to ensure the effective implementation of MPAs.**

Scale and ambition

Hundreds of submissions received welcomed and supported the target of 30% of Irish waters being protected by 2030 as part of the MPA network and dissatisfaction was expressed in responses at the current level of protection of 2%. Some respondents advocated for more ambitious targets (50%) while others suggested interim targets (e.g., 20% by 2025). Concerns were also raised about the feasibility of the 30% designation, noting that the proposed coverage would require the majority of the MPA sites to be offshore, with a "large proportion far offshore". The challenges imposed by the scale of the designation and management area were also put forward.

Feedback suggested that MPAs should encompass as broad a range of habitat types, ecosystems, and species protections as possible and have a wide geographic scope. Inland Fisheries Ireland (IFI) noted that large reserves are more effective at "promoting biomass and abundance" as supported by empirical studies and meta-analysis.

Some submissions made practical suggestions for site boundaries that the boundaries of some SACs consisting of bays, estuaries and fjords could be expanded to provide additional protections, and that where national parks touch the coastline that their boundary could be extended out to the six-mile limit.

Ecological considerations

Responses noted the approach of using a network of large MPAs as opposed to smaller MPAs is more effective, "unless these are effectively networked at a scale that supports appropriate ecological connectivity for target species and communities".

Responses noted that connectivity between sites is needed to allow species to move from one MPA to another. Feedback from the Marine Institute noted that designing an MPA 'network' requires connectivity and that "identifying the connectivity matrix will need additional work on ocean and ecosystem modelling".

The dynamic nature of the marine environment is highlighted in feedback, with submissions noting the need to consider the relationships between MPA and non-MPA sites due to the fluid nature of boundaries which can change in "real time".

IIMRO suggested that areas within the six-mile limit could be co-managed to allow the establishment and development of sustainable inshore fisheries management (for vessels under 12 metres), emphasising that working with fishers is the preferred approach to MPAs.

Submissions cited the need for Ireland to work with neighbouring jurisdictions to ensure a "coherent and cohesive ecological network". It is also noted that the designation process should seek to work "beyond jurisdictions".

Some suggestions were received of locations that might be given consideration as part of the expanded MPA network, including those shown in Table 3 below and in Appendix B.4.

Table 3 – A selection of suggested MPA locations referenced in submissions received to the public consultation

Ballyness Bay	Killiney Seascape Area	Renard Strand / Derreen River
Bantry Bay	Ling Rocks (off Co. Cork)	Roaringwater Bay
Blacksod Bay	Lough Foyle	South Wexford Coast
Clew Bay	Lough Mask	Tralee Bay
Dublin Bay	Lough Swilly	Whiterock
Galway Bay	Raven's Point	
Kilkieran Bay		

4.8.1   Definition of an MPA

Several responses referred to the proposed definition of an MPA provided in the expert report. Some responses suggested the removal of specific terms from the definition, these included the phrase "long-term" (in order to reflect urgency), and "specified" (to include species not yet identified and accommodate a holistic approach).

Other submissions suggested additional words or concepts be included in the definition including "whole site approach", words to preclude activities in an MPAs, "data and evidence-based approach", "socio-economic" objectives and "conservation objectives".

4.9   Challenges and Opportunities in the Enforcement of MPAs

The establishment of appropriate management plans is crucial to the effective management and enforcement of MPAs.

Current management of protected sites falls short of what is needed, while management plans will need to be established and adhered to in order to be effective.

The role of the public and stakeholders in the management and monitoring of MPAs is essential.

Engagement with, and increased resourcing of key agencies is necessary to undertake the role of enforcing MPAs is advocated.

The MPA process offers the opportunity to address a number of data and knowledge gaps in the marine environment, with opportunities for data sharing amongst stakeholders.

Monitoring of MPAs should be consistent to ensure high quality data and that changes in MPAs can be compared across the network.

There were many submissions which identified ways in which the proposed MPA network could be effectively managed.

Effective management plans

Submissions recognised that management plans provide both a framework for delivery of conservation objectives as well as greater clarity for how sites should be managed. Respondents identified the need for a strong scientific basis for the development of management plans coupled with the need for stakeholders to be

custodians through involvement and participation in the development of management plans. Suggestions included the use of "bottom-up" local level monitoring and citizen science to encourage ownership, stewardship, and local buy-in.

Other characteristics of effective management plans were identified through submissions, and these included the need for clear goals and objectives, including 'SMART' targets, independent oversight and evaluation including a regular review process.

Resource constraints

Respondents also put forward the need for financial support for the process and cited potential resource constraints at several Government agencies that might require additional resources. These included the Sea Fisheries Protection Authority (SFPA), the NPWS, Irish Naval Service, the EPA, the Coast Guard and IFI.

Management challenges and potential solutions

Potential difficulties in enforcement and management (particularly in offshore areas) and monitoring were identified resulting from the large spatial scale of the network, as well as the potential opportunities and challenges presented by "mobile" MPAs. The importance of early monitoring to enable identification of trends, and the potential for fishers to be included in the monitoring efforts, were also stressed.

The need for a legal monitoring mandate was cited and some submissions identified specific monitoring measures such as: "on-board monitoring systems" for fishing vessels, including Vessel Monitoring System (VMS), Global Positioning System (GPS), Automatic Identification System (AIS) and CCTV technologies; "Passive surveillance", the development of an accessible reporting system, and the inclusion of anglers and other local actors.

Responses cited the need for independent oversight of the management and enforcement of MPAs and for periodic reviews of the MPA network. Feedback also considered that reviews of the network should not result in changes to the protection levels or designations.

4.9.1   Monitoring, Data Collection, and Information Sharing

The importance of gathering, sharing, and using data were raised through a number of submissions. Respondents identified data and information gaps, including gaps in baseline data to define "pristine" sites, gaps in knowledge of the conservation status of commercial species, seabed mapping and species distribution. Some respondents were concerned that that this could lead to delays in the implementation of the MPA process.

Other submissions welcomed the opportunities that the process offers in terms of gathering new, well designed, and consistent monitoring, to collect high quality reliable data that could ensure trust from stakeholders.

The sharing of data was identified as a means of developing a common understanding of the evidence base and opportunities for cross-sectoral collaboration. Some respondents maintained that the increasing availability of open-source data could be used to support the MPA designation process. The use of existing data on seabed disturbance (to support the MSFD) were suggested as a potential contributor to site designation. The potential role of the ORE sector in gathering data was identified, though some submissions expressed concerns about the potential overreliance on developers to provide data.

4.10   Role of Science and Research

> **Extensive work is required to address the lack of data and knowledge for many aspects of the marine environment.**
>
> **There is concern that existing data gaps will lead to delays in the implementation of evidence based MPAs and may be a barrier to effective conservation measures.**
>
> **Investment is needed in data gathering and research into the marine environment to help identify and understand the effectiveness of MPAs.**
>
> **The role of schools, universities, industry, NGOs, citizen science, fisheries stakeholders, and community groups in the research process are key to the bottom up gathering and sharing of data.**
>
> **Research is a valid reason to designate an MPA, and not just an incidental benefit.**

A number of submissions highlighted the role of science and the need for evidence-based designation in the MPA process, stressing the role of the research sector in the process, the requirement for research in understanding the connectivity of MPAs, and the linkages between MPAs with ecosystems as well as with socio-economic activities.

A range of ongoing initiatives which could support the process were identified by respondents. These included initiatives such as the INFOMAR and ObSERVE programmes, the SeaRover survey, Blue Growth and MSP programmes, Marine Institute Fish Surveys, and European Maritime and Fisheries Fund projects, as well as the work of institutions such as the National Biodiversity Data Centre, plus citizen science initiatives and the involvement of NGOs.

Some submissions noted the requirement for investment in research while others suggested that an academic research mandate could be included. There were also calls for research and education activities to be minimally invasive. Some respondents considered that potential education and research benefits should be a valid reason for the designation of MPAs, and not just an incidental consequence or benefit.

4.11   Governance and Leadership

> **Ireland has the potential to be a world leader in the designation and management of MPAs.**
>
> **There is a necessity for a clear timeframe for implementation.**
>
> **Adequate resources are needed to ensure the success of the MPA process, with concern that the scale of the task could be overwhelming for existing structures, and national coordinated support will be needed.**
>
> **The value of cross border cooperation and working with other jurisdictions is highlighted.**
>
> **The implementation of existing European legislation requirements is inadequate, and we are behind on our obligations in terms of the protection of the marine environment.**

Several respondents identified the potential for an effective MPA process to generate national pride in environmental protection and for Ireland to act as leader on the world stage, as a champion for environmental protection within Europe (for example during the Irish presidency of the EU in 2026). Responses also cited Ireland's role as a leader in the OSPAR regional process and in the negotiation on international efforts in the management of Biodiversity in Areas Beyond National Jurisdiction (BBNJ).

Some submissions noted that Ireland is already a leader in renewable energy production and that the MPA process offers an opportunity for the country to be a leader in the protection of the marine environment. The potential to engage citizens through a citizens' assembly on ocean health and the value of cross-border cooperation were also highlighted.

A number of challenges were also identified including the urgency of the issue, the need for a clearer indication of timeframes, and the "potentially overwhelming" scale of the task ahead as well as the current levels of resourcing and the need for capital investment, staffing and upskilling.

Governance challenges were a common concern in submissions. The need for a coherent approach across plans, policies and legislation was identified, and some respondents raised concerns over "fragmented governance structures" with policy responsibilities being spread across Government departments and agencies.

There was support for the urgent establishment of a well-resourced, cross-Departmental independent and accountable national coordinating body including field workers, researchers, and policy makers as well as experts in public engagement and stakeholder management. The potential to have a single Department coordinating such a body, and the use of a memorandum of understanding with other Government departments and statutory agencies was also raised. It was noted that this body should support an ongoing process of data collection, monitoring, analysis, and assessment, as well as other activities such as foreshore consenting and marine planning. The need for clarity on the role of local authorities in the MPA process was also raised in submissions.

A number of responses highlighted the political challenges to achieving an effective MPA process. Some submissions suggested that benefits may accrue to coastal communities, with less political benefit in non-coastal areas. The potential for this imbalance to result in the prioritisation of economic interests ahead of the environment was noted.

4.12   Area Based Measures and OECMs in the MPA Network

> SACs and SPAs should be protected immediately and that their inclusion in the MPA network may be an opportunity to further strengthen these sites.
>
> There is concern that current protections are inadequate, and that robust management plans are needed for all legally protected sites.
>
> Legislation should enable an 'whole site' / ecosystem-based approach for MPAs, allowing for protection of all species and features in an MPA, and to preserve the integrity of the sites.
>
> The inclusion of OECMs in the MPA network has potential benefits for the connectivity of MPAs.
>
> More research is needed into the opportunities and limitations of OECMs.
>
> OECMs including shipwrecks have potential for inclusion in the MPA network with importance as benthic habitats.
>
> Mobile MPAs have potential to reflect the transboundary nature of marine habitats and species, and to protect species and habitats which change through space and time.
>
> Mobile MPAs may present challenges to the planning and Environmental Impact Assessment (EIA) process for developments.
>
> A proportion of the MPA network could be 'highly protected'.
>
> Highly protected MPAs could be established at the outset of the MPA process and could be selected as pilot projects in advance of the legislation being implemented.
>
> Temporary designations of MPAs, or MPAs which are time bound, may be suitable in order to regenerate habitats, and accommodate species.

4.12.1 Inclusion of existing legally protected sites

There was broad support for the inclusion of existing legally protected sites within the MPA network. Responses noted that SACs and SPAs should only be included in the MPA network if they meet "specific criteria" for inclusion.

Some submissions expressed concern that there is currently inadequate implementation of existing Irish and European legislative requirements, such as protections for sites under the Habitats Directive and Birds Directive, including the lack of management plans and monitoring programmes and other obligations to the EU in terms of the marine environment. Others note that designations offer protection to a specific species or habitat rather than the site as a whole.

The EPA noted that the designation of the Natura 2000 sites as MPAs is a positive opportunity to set new objectives in order to further strengthen them, and IFI considered the inclusion of these sites a "reasonable and logical approach". An Taisce supported their inclusion as part of an ecologically coherent network, but not to detract from the existing sites. Practical suggestions to improve management included the need for clear guidelines to avoid "multiple layers of decision makers and management where a site is legally protected / designated by multiple legislations".

IIMRO expressed concern that the designation of Natura 2000 sites, which would naturally incorporate many of the offshore islands "could have a disproportionate effect on their future if not managed appropriately and sensitively". The process of stakeholder engagement for previous designations of legally protected sites was considered to be poor, and there is some concern that this could be repeated with regard to MPAs.

4.12.2 Ecosystem-Based Approach

There was strong support across the submissions for the implementation of an Ecosystem-Based or 'whole site approach' to designating MPAs rather than a 'feature based approach' in that it may "help prevent the creation of ineffective MPAs". It is noted that the whole site approach would offer protection to all species and features within a site, thereby preserving the "integrity of the overall site". Some responses suggest enshrining the whole site approach in law, following IUCN guidance, noting that the feature-based approach has had "limited success" in existing protected areas.

Some responses advocated for "buffer zones" allowing "low impact" commercial activities which could be established in order to enhance the protection of the areas surrounding an MPA, offering further protection to the designated site. Responses note that this approach recognises the relationship between MPA and non-MPA sites due to the fluid nature of boundaries changing across space and time. Feedback suggests that these buffer zones could allow 'low impact' commercial activities, subject to an environmental assessment.

4.12.3 Other Effective Area-Based Conservation Measures - OECMs

Many submissions identified the potential for OECMs to be included as part of the MPA network. There is some scepticism over their inclusion as responses highlighted that the primary objectives of OECMs is not conservation, while others considered that more research is required to establish their effectiveness. Several submissions noted that ORE sites are not trawled and are left idle and therefore could help to improve connectivity in the MPA network. Other submissions considered that shipwrecks could be appropriate OECMs as they can act as "natural havens for fish", have importance for benthic habitats, and bring economic benefits in the form of diving tourism and angling which can support coastal communities. There were divided opinions on the inclusion of fisheries management zones in the MPA network.

Some respondents considered that OECMs should be included in addition to the proposed 30% area increase (or that further clarity was needed on whether and to what extent they should count toward the 30% target). Others raised concerns that the inclusion of OECMs could artificially inflate the percentage of MPAs, while others stated that their inclusion should be conditional on the definition of their management objectives. Issues of enforcement were also raised, with submissions concerned with what they claimed is a poor track record to date.

Responses noted that OECMs may be able to provide "indirect protections" in their designation, such as connectivity, but that these will need to be clearly understood before they can be included in the 30% proposed percentage cover as "legal protections will not be the same". One submission also noted that the inclusion of OECMs may be at odds with the "whole site" approach where the primary objective of the site is not marine conservation.

4.12.4 Mobile MPAs

Submissions reference the potential for 'mobile-MPAs', which it is suggested would better allow the sites to reflect the "wide-ranging transboundary movement of most aquatic species" and to protect species and habitats that change through space and time. Some respondents considered that data confidence is extremely important in regard to mobile species, and that efforts need to be made to "ensure that the critical habitats of mobile species are adequately identified, and the implications of pressures such as climate change understood before proposals to designate MPAs for highly mobile species are progressed".

Other submissions identified difficulties arising from the use of mobile MPAs, these included concerns from the ORE sector over implications for development, construction, and operation phases as well as in carrying out EIAs. Difficulties were also identified with understanding how mobile MPAs would work within the planning process.

4.12.5 Highly Protected MPAs

There was mixed support for the concept of highly protected MPAs. Some respondents considered that some, the majority, or all of the MPA network should be "highly protected". Submissions defined highly protected as the restriction of "industrial and harmful activities". Submissions also advocated for the potential to increase the status of MPAs to that of 'marine reserves', which are referred to as 'fully protected' MPAs and which would be no-take areas for fisheries. A number of submissions argue for a clear distinction between 'protected' and 'highly protected' MPAs.

Potential benefits from highly protected areas included enhancement to fisheries (contingent on their size, monitoring and protection). The Marine Institute noted that a highly protected network would "enable determination of any adaptation and shifts in species distributions in response to climate change".

However, IIMRO noted that the designation of highly protected MPAs (or no-take areas) for inshore areas "must be avoided as it will remove small-scale artisanal fisheries from the seascape and greatly damage their communities".

Respondents suggested that a number of highly protected areas could be selected as pilot projects at the outset of or in advance of the implementation of legislation in order to identify "issues and problems".

4.12.6 Other Designations

A range of suggestions were made regarding temporary designations for various reasons, these included "temporary designations for the purpose of attempted remediation of degraded habitats" which would be a temporary suspension of activities to limit, mitigate regulate or control risk.

The Irish Planning Institute referred to designating and managing MPAs using tools such as "Strategic Marine Activity Zones" which allows for part of the maritime area to be "established as a zone for activities that are of environmental, social and economic importance".

Feedback also suggested that that some "discrete surface hotspots" could be implemented via legal resolution and using existing legislation. This may include seasonal restrictions on certain activities, restrictions of fishing methods and / or types or limitations on infrastructure development.

4.13 Climate Action

> **Resilience to climate change, the production of oxygen, carbon sequestration, and climate mitigation are key potential functions of a future MPA network.**
>
> **The role of MPAs in addressing the biodiversity and climate crises is highlighted in submissions.**
>
> **Climate-specific monitoring of MPAs is needed as part of the designation, implementation, and management of MPAs.**
>
> **MPAs need to consider the competing requirements of the Climate Action Plan.**

Importance of MPAs for Climate adaptation

Submissions noted that MPAs are a tool that can be utilised to address the 'twin crises' of biodiversity loss and climate change and supporting resilience to climate change was considered a key function of the MPA network.

The role of phytoplankton in the oceans in the production of oxygen and carbon sequestration was considered a key factor for consideration in terms of the role of MPAs in addressing climate change, noting that through phytoplankton, the ocean gives us more than half the oxygen we need.

The Irish Wildlife Trust suggested that the carbon storage potential of an MPA may be considered as part of the selection criteria. The implementation of "active restoration projects" with community input is referenced as a means of helping to restore sites (to increase carbon sequestration) as part of the MPA network, and a focus on nature-based solutions to address climate change was also raised.

Balancing adaptation and mitigation

Submissions noted that MPAs also need to be balanced with the competing requirements of the Climate Action Plan including increased reliance on offshore energy, enhanced port infrastructure, etc., but that providing protection to the marine environment through MPA designation will help with climate mitigation, carbon sequestration, and may support increased climate resilience of our oceans.

'Climate smart' MPAs are mentioned in a number of submissions for their potential to help mitigate the harmful effects of climate change. It is noted that these MPAs could be established "explicitly for their potential climate mitigation or adaptation benefits". Feedback noted that the parameters of what makes an MPA 'climate smart' should be rooted in naturally occurring processes and nature-based solutions and should not include ORE developments or another climate smart technology.

Implications of Climate change for MPAs

Feedback suggested that climate specific monitoring and assessment should be considered as part of the designation, implementation, and management of MPAs, in order to allow MPAs to be monitored for climate impacts and adapted accordingly. Responses suggest that sensitivity assessments should include assessment of climate change pressures and the establishment of a "sensitivity score under different [emissions] scenarios" in order to understand their levels of resilience and to "future proof" management plans. Responses noted that "adaptive management" systems are needed in order to ensure that climate impacts are adequately measured and mitigated.

4.14   Offshore Energy

> **A future MPA network may interact with ORE development.**
>
> **The role of Ireland's ports in facilitating offshore energy development is highlighted submissions.**
>
> **Uncertainty around the MPA process may impact the delivery of ORE developments.**
>
> **ORE developments may present opportunities for biodiversity through the provision of artificial reefs.**

Potential costs to the ORE industry and measures suggested

A number of submissions were received to the consultation from representatives of the ORE sector, particularly offshore wind development. The role of ORE in tackling climate change and the potential economic impact of ORE development on coastal and island communities were noted. The role of the industry in benefitting coastal communities through high value employment, sustainable economic growth, community benefit funds, and contribution to the transition to the "green economy" were also stressed.

Feedback from the ORE industry raised concerns that the introduction of MPAs may lead to increased financial outlay for the sector and could "result in uncertainty and additional costs […] which may erode investor confidence, or in the worst-case, render projects economically unviable".

Examples of additional costs cited included: additional assessment and survey costs, mitigation measures for new developments to meet protection objectives, costs associated with delays to the consenting process, and loss of investor confidence due to uncertainty.

Submissions identified a range of measures which could help to avoid such difficulties, including the communication of the locations of scientific focus, habitats and species identified for protection, and clarity on potential locations as early as possible. Responses noted that the development of guidance on the assessment mitigation and monitoring of impacts (for ORE and other sectors) is important to allow for the effective EIA process accounting for MPAs.

Offshore Renewable Energy and Environmental Impact

Some submissions from the sector observed a tendency to assume that ORE development has adverse effects on the environment and suggested the potential for offshore developments to be co-located with MPAs. Submissions noted that ORE developments have potential to provide opportunities for biodiversity such as the use of their foundations as artificial reefs and the potential benefits of lower fishing intensity in these areas for creating biodiversity corridors and "stepping-stone" habitats. Responses also suggested that the proposed MPA objective of the "prevention of impacts from specified pressures" may be too restrictive for the co-existence of the ORE sector, and that mitigation and monitoring can help to prevent or reduce impacts.

Other submissions expressed concerns about the impact of ORE development on ecology and biodiversity such as uncertainty surrounding impacts on seabirds, habitat changes, changes to the food web, increased vessel traffic, etc.

Planning, Governance and Offshore Renewable energy.

Submissions queried the interrelationships between the MPA process and other related legislation and policy such as the MSFD, Marine Area Planning (MAP) Bill, and NMPF. Representatives of the industry questioned how these interacting policies will impact development and affect the relationship between ORE and MPAs and called for a coherent strategy to be set out. Some submissions suggested that the NMPF and MAP Bill and MPA designation should be in place before ORE developments can commence. It was also suggested that MPA designation should be cognisant of existing infrastructure and awarded consents / licences and approvals.

Some submissions expressed the view that industrial uses of the seabed for mineral exploration, fracking and fossil fuels including gas and petroleum should also be prohibited and that the location of MPAs near damaging locations such as gas extraction sites may be contradictory.

4.15   Planning and Development

> **Clarity is needed on how MPAs will link to the planning process.**
>
> **An 'envelope' could exist around coastal facilities to allow for sufficient growth and flexibility.**
>
> **There are already difficulties in securing planning in existing designated sites.**
>
> **Defined environmental objectives and science-based guidelines are required to inform planning for future developments.**

The impact of the MPAs on the planning process and *vice versa* was well-represented through the submissions received.

Difficulties in securing planning in existing designated sites and preclusion of local authorities from carrying out infrastructure work in these sites were highlighted in submissions. The need to clarify the relations between new MPAs and the associated process, and existing planning policies and obligations was stressed.

Examples of planning interactions which were raised included those between Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) requirements of the Habitats Directive and their relationship with the MPAs, as well as the need for guidance and certainty on the level and nature of acceptable development in MPAs. There were calls for robust public research in regard to future developments to ensure the application of appropriate standards and measures, while a submission from the Irish Wildlife Trust suggested removing the 15% disturbance threshold associated with AA for MPAs.

Feedback highlighted uncertainty in the current approach and the need for realistic and measurable environmental objectives and clear science-based guidelines to inform planning for future developments.

There was recognition that the MPA process is needed for effective implementation of the MSFD and NMPF policies around biodiversity, and that as it stands there is a risk of planning decisions being made before MPAs are introduced, or of causing a delay in the making of decisions. It was noted that this could create some uncertainty among developers or delays in carrying out initial investigative works for offshore developments. Some suggested that where planning is granted during the interim period before the setting of MPA legislation, that is should be "subject to clear caveats" (such as changes to the permission granted, additional restrictions, or even potential revocation), with one submission suggesting that existing legacy projects should be reconsidered.

There were calls for clarity around how the planning process will work alongside the MPA process and how development consent functions can be achieved. Proactive, coordinated land, coastal and marine planning was recommended by the EPA as part of the MPA process. Recommendations and suggestions from other groups included the need to furnish local authorities with adequate information to inform licencing decisions (e.g., through a mapping tool), the need account for future port development, growth 'envelopes' around coastal facilities to allow flexibility in development, provision for dumping at sea and impacts on foreshore developments.

Procedural clarity was requested for projects with Imperative Reasons of Overriding Public Interest (IROPI) or similar processes in MPAs as well as the status of legacy strategic infrastructure projects. Feedback from the Department of the Environment, Climate and Communications noted the added value of the requirement for developers to gather extensive environmental data as part of the planning process, which can help to identify future negative impacts.

4.16   Tourism and Recreation

MPAs have the potential to develop 'eco-tourism' and sustainable tourism in Ireland, and that associated increased marine life in MPAs will allow for increased tourism.

The value of the sea for the development of non-invasive recreational activities including kayaking, diving, bird, and other wildlife watching will help coastal economies to continue to develop.

Ireland's 'green' image can be bolstered by MPAs.

MPAs may bring added value to the recreational angling sector.

Respondents supported the role of MPAs and considered that there were important links between the development of MPAs, their potential to reverse a decline in marine life and to have positive impacts by supporting and increasing eco-tourism. Economic benefits were considered likely from increased tourism in terms of visitor numbers and opportunities for angling, diving, sea-kayaking, natural history engagement and small boat hire, all of which had perceived economic benefits for coastal communities. Respondents considered that MPAs would help reinforce the Ireland's 'green' image that is central to the hospitality industries.

Concerns were raised about potential conflicts between high powered leisure crafts, jet skis and other activities considered 'less desirable' or 'high impact' and the associated disturbance of habitats, marine mammals, and another fauna.

4.16.1 Recreational Angling

Submissions cited the decline of the marine environment as having a direct impact on the viability of recreational angling over the past number of decades. Feedback from the angling sector stated that "angling tourism cannot continue to exist and thrive without fish" and noted the importance of recreational angling as a source of income for many coastal communities.

Submissions welcomed the designation of MPAs as an opportunity to "regenerate the inshore areas and attract angling tourism to the levels previously enjoyed". The potential for anglers to participate in the MPA process was identified, however responses also suggested that anglers might resist "top-down" exclusion from site, underscoring the need for proper engagement.

4.17 Marine Literacy and Education

> **Educational programmes and science-based tourism products as key tools for raising awareness of MPAs are considered to be important.**
>
> **Proper promotion of the MPA network though information campaigns, marketing, and community engagement are essential.**

Submissions identified the benefits of education and enhanced "marine literacy" and public awareness as a means of ensuring "support for a sustainable approach to protecting and managing our marine resources".

An Fóram Uisce highlighted examples from other parts of the world where MPAs have been implemented and where education and awareness have been used as key tools in achieving this. Research to support education and outreach was considered a key component to changing attitude and increasing local knowledge. The Philippines was cited as an example where educational workshops, community empowerment and stakeholder involvement were key factors for successful MPA management.

The need for the development of supporting tools such as "a wider educational programmes" about MPAs was highlighted. The Irish Tourism Industry Confederation noted that the development of "a science or education-based tourism product" would assist in the delivery of communication and education as well as contributing to local coastal economies. The potential to develop a world class recreational sea angling tourism product, as a catalyst for education and communication was identified.

Other suggested mechanisms for education and awareness raising included increased online visibility, a public information campaign, information leaflets, town hall style meetings, updated mapping, and the use of national media to create a "presence for MPAs". Branding and marketing were also identified as important ways to make the public aware of MPAs. Respondents also identified the potential benefits of appointing MPA "stewards" with roles in monitoring and reporting on MPAs as well as educating visitors.

IFI noted that increasing awareness of "unseen habitats" through education will help to increase the "intrinsic value of the site" and to confer "meaningful ownership" of a site or species. The Irish Whale and Dolphin Group noted the status of cetaceans, such as whales and dolphins and "flagship" species, which could be used to promote the benefits of MPAs. They express the view that MPAs "with cetaceans as species of interest are designated early so that the public can engage with the MPA process".

5   CONCLUSION

It is very clear from the extensive and abundant responses to the public consultation that there is significant support for the expansion of Ireland's MPA network to 30% of Irish waters by 2030 and that the current MPA coverage in Irish waters is considered inadequate.

Submissions strongly indicated that Ireland has the potential to become a European and global leader in this area, to instil national pride in the MPA process and network and set an example for others to follow.

There is a clear desire for the Department to undertake meaningful, early, and timely stakeholder engagement and consultation in order to successfully implement the MPA process in a way that is acceptable to as many as possible. It is clear from the submissions received that this is a crucial element of the process.

There is strong, cross sectoral support for the progression of the MPA process from a social, environmental, and economic perspective as demonstrated by stakeholders and members of the public who participated in this public consultation process.

Many valuable and valid views have been highlighted through the submissions received, with this report attempting to capture the diverse range of perspectives, observations, priorities and demands of stakeholders in relation to MPAs and to the MPA process.

It is clear from the volume and nature of submissions received, that this is an emotive topic, and that many people feel passionately about the MPA process and wish to be involved in its progress.

There will be a challenge to address the various wants and needs of different sectors and competing interests, but the strong support for the MPA process, expressed through the public consultation submissions, is a positive indication that stakeholders and the wider public are willing to get involved in the process.

The challenges of addressing gaps in our knowledge of the marine environment, discrepancies, and linkages between related legislation and policies, plus adequate human and material and financial resourcing are repeatedly highlighted as needing to be overcome to achieve the vision for the MPA network in Ireland.

Addressing these issues in a timely manner and in tandem is a priority of consultation participants, reflecting what is regularly referred to as the urgency of the issue.

Striking a balance between the environmental, social, cultural, and economic demands of stakeholders and the conservation needs of the marine environment and its biodiversity is also a challenge to be addressed through the MPA process. Competing interests, policies and legislations need to be navigated as part of the successful implementation of the process.

5.1   Next Steps

Informed by the consultation process and the resulting information, the Department is now in the process of developing stand-alone legislation to enable the identification, designation, and management of MPAs in accordance with Ireland's national and international commitments. This work is expected to continue throughout 2022.

GLOSSARY OF TERMS

AIS	Automatic Identification System
BBNJ	Biodiversity in Areas Beyond National Jurisdiction
CFP	Common Fisheries Policy
DHLGH / 'The Department'	Department of Housing, Local Government and Heritage
Advisory Group report	'Expanding Ireland's Marine Protected Areas Network: A report by the Marine Protected Area Advisory Group for the Department of Housing, Local Government and Heritage
IFI	Inland Fisheries Ireland
IUCN	International Union for the Conservation of Nature
Ecosystem-Based Approach	Focuses on ecosystem restoration and enhancement of ecosystem services to protect society against negative impacts of climate change.
EPA	Environmental Protection Agency
EU	European Union
GES	Good Environmental Status
GPS	Global Positioning System
IIMRO	Irish Islands Marine Resource Organisation
IROPI	Imperative Reasons of Overriding Public Interest
MAP	Maritime Area Planning
MPA	Marine Protected Area
MSFD	Marine Strategy Framework Directive
MSP	Marine Spatial Planning
NGO	Non-governmental organisation
NMPF	National Marine Planning Framework
NPWS	National Parks and Wildlife Service
OECM	Other Effective [Area-based] Conservation Measures
ORE	Offshore Renewable Energy
OSPAR	The mechanism by which 15 Governments & the EU cooperate to protect the marine environment of the North-East Atlantic.
Precautionary Principle	Aimed at ensuring a higher level of environmental protection through preventative decision-taking in the case of risk
SAC	Special Area of Conservation
SCP	Systematic Conservation Planning
SFPA	Sea Fisheries Protection Authority
SPA	Special Protection Area
SWAN	Sustainable Water Network
VMS	Vessel Monitoring System
WFD	Water Framework Directive

Appendix A – List of organisations who made written submissions

A.1 Organisations who made submissions via the online survey

As part of the dedicated survey form, respondents had the option of including the name of their organisation if they were responding in a professional capacity, The table below lists the organisations which were identified by survey respondents.

Abalone Chonamara Teoranta	Meath County Council
Allihies Seafood Ltd.	MERC Consultants Ltd.
Anam Cara Therapy	Mizen Tourism Cooperative Society Ltd.
Ascophyllum Nodosum Processors Group	National Animal Rights Association
Asentive Hub Ireland	National Inshore Fisheries Forum
Atlantic Quay Ltd.	National Inshore Fishermen's Association
AWN Consulting	National Inshore Fishermen's Organisation
Baldoyle Forum	Native Oyster Reef Restoration Ireland.
Ballycotton Fishermans Association Ltd.	Natural Capital Ltd.
Bantry Bay – Protect Our Native Kelp Forests Campaign	Nature Guide Academy
BioAtlantis Ltd.	North Regional Inshore Fisheries Forum
Bord Iascaigh Mhara	North West Inshore Fishermens Forum
Cllr. A. Buckley, Fianna Fáil	North Western Waters Advisory Council
Clonakilty Charter Ltd.	NUIG
Coastwatch	O' Murchu Mussels Ltd.
Codling Wind Park Ltd.	Ocean Winds
Cork Environmental Forum	Oceandivers Limited
Cubic Vision International Ltd.	ODS Fishing Ltd.
Damien Turner Fisheries Ltd.	Off the Scale Magazine
Darrycahoon Agri-services Ltd.	ORCA Ireland
DCU Water Institute	Orca Marine Ltd.
Downeaster Ltd.	P. Mac Lochlainn, Sinn Féin T.D.
Doyle Shipping Group	Querrin Pier and Village Community Development Group
Dublin Port Company	Renard Save Our Strand
Dungarvan Bay Charter Boats	Ross Shellfish Ltd.
EirEco Environmental Consultants	Saltwater Stories
Environmental Protection Agency	Save Our Seafront
ESB	Save the Swilly
Fermoy Youth and River Amenity Group	Sea Fisheries Protection Authority
Friends of the Irish Environment	Sea Shepherd Ireland
Galway Atlantiquaria	Sea Synergy
Galway Bay Inshore Fisheries Association	Sek Dublin International School
Galway Mayo Institute of Technology	Sheeps Head and Bantry Tourism Co-op
Green Schools Ireland	SLR Environmental Consulting Ireland Ltd. For Mag Mell Energy Ireland Ltd.
Griffith College	Socrates Workforce Solutions
Hopkins Marine Ltd.	South East Coastal Protection Alliance
Horse Holiday Farm	South East Regional Inshore Fisheries Forum
IFA Aquaculture	South West Regional Fisheries Forums
Inland Fisheries Ireland	Stationary Superstore
Irish Elasmobranch Group	SuirCan Environmental CLG
Irish Premium Oysters	Tattan Trawls Ltd.

Irish South and East Fish Producers Organisations	The Mill River Conservation Group
Irish South and West Fish Producers Organisation	Trinity College Dublin
Irish Whale and Dolphin Group	UCC MaREI Centre
JNCC	University College Dublin
Kedge Fishing Ltd.	West Cork Sailing Centre Ltd.
Kevin Byrne Marine	Westpoint Shellfish Ltd.
Killary Adventure Co.	Wexford Harbour Boat and Tennis Club
Killiney Bay Community Council	Wicklow Wildlife Welfare
Killybegs Fishermen's Organisation	Wild Derrynane
Kite Investments	Wilderness Ireland
Know Yoga Ireland	Wildeye
Korpanes Fishing Ltd.	Wildkildare
Leave No Trace Ireland	Youghal Blue and Green Community Network
Liquid Therapy	
Local Authority Waters Programme	
Louth County Council	
Lurgan Green Shellfish Ltd.	
M. Collins, Independent T.D.	

A.2   Organisations who made written submissions

A number of representations were received from representative groups including statutory bodies, community and voluntary organisations, non-governmental organisations, and representatives from industry and research. These organisations are listed in the table below.

An Bord Pleanála	Inland Fisheries Ireland
An Fóram Uisce	Inshore Fisheries
An Taisce	Irish Council Against Blood Sports
Angling Consultative Council Ireland	Irish Environment Network
Ascophyllum nodosum Processors Group (ANPG)	Irish Islands Marine Resources Organisation
BioAtlantis	Irish Planning Institute (IPI)
BirdWatch Ireland	Irish Tourism Industry Confederation (ITIC)
Blue Marine Foundations	Irish Water
Clare PPN / Clare Environmental Network	Irish Whale and Dolphin Group
Coastal Concern Alliance	Irish Wildlife Trust
Comdháil Oileáin na hÉireann	Jesuit Centre for Faith and Justice
Coomhola Salmon Trust	Killiney Beach Environmental Group
Cork County Council	Marine Institute
Cork Nature Network	National Geographic Pristine Seas
Department of Agriculture, Food and the Marine	Northern Ireland Marine Task Force
Department of the Environment, Climate and Communications	Not Here, Not Anywhere
Department of Foreign Affairs (Climate Unit)	Port of Waterford
Department of Transport	Renard Save Our Strand
Diving Ireland	Save Ballyness Bay Action Group
Donegal County Council	Save the Swilly
DP Energy with Iberdrola Renewables Ireland	Seasearch Ireland
Dublin Friends of the Earth	South Wexford Coast Promotions
Emerald Floating Wind (Simply Blue Energy Kinsale Ltd)	SWAN
Environmental Protection Agency	SWAN (joint response on behalf of Irish Wildlife Trust, Sustainable Water Network (SWAN), The

	Environmental Pillar, Irish Whale and Dolphin Group, An Taisce, Seas at Risk, Coomhola Salmon Trust, Friends of the Earth NI, Friends of the Earth, Galway Atlantaquaria, Killiney Bay Community Council, Save the Swilly, Coastal Concern Alliance, Coastwatch, Blue Marine Foundation, Northern Ireland Marine Task Force, National Geographic Pristine Seas, Cork Environmental Forum)
Flossie and the beach cleaners	The Ray Project
Fred Olsen Renewables Ltd (FORL)	Údarás na Gaeltachta
Galway City Community Network	Western Star Wind (Simply Blue Energy)
Hopkins Marine	Wind Energy Ireland
IBEC	

Appendix B – Response to Survey Question 6

A number of animal and plant species and habitat types were provided in response to question 6 of the online survey: Based on the analysis and details presented in the report, are there any Animal species or Plant species or Habitat types that you think must be given greater or improved protection through the legal designation of new MPAs?".

Species and habitat type suggested in the responses are detailed in the tables below.

B.1   Plant Species

Algal	Kerry Lily	Salicornia
Ascophyllum nodosum	Macroalgae	Sea holly
Bladderwrack	Maerl	Seagrass
Brown algae	Marram grass	Seaweeds (various)
Cruoria cruoriaeformis	Microalga	Tubeworms
Dermocorynus montagnei	*Padina pavonica*	Wildflowers
Egg wrack	Phytoplankton	Zostera / Eel grass
Kelp	Red algae	

B.2   Animal Species

Albacore	Fireworks anemone	Pollan
Alcyonacea	Flapper skate	Polychaete
Alfonsino fish	Flat oyster	Porbeagle sharks
Allis shad	Flatfish	Portuguese dogfish
Amphibians	Flounder	Prawns
Angel shark	Foxes	Puffin
Arctic charr	Freshwater pearl mussels	Rabbitfish
Arctic tern	Frog	Rabbits
Atlantic goliath grouper	Gannets	Ray
Atlantic halibut	Golden oriole	Razor clams
Atlantic salmon	Golden plover	Red knot
Atlantic wolf-fish	Goldeneyes	Red-breasted merganese
Badgers	Goose barnacle	Redshank
Bait fish	Grasshopper warbler	Red-throated diver
Baleen whales	Great crested grebe	Ringed plover
Barn owl	Greater scaup	River lamprey
Bar-tailed godwit	Greenland shark	Rock pipit
Basking sharks	Greenshank	Sabellaria
Bass	Grey plover	Salmon
Bats	Grey seal	Sand eels
Bees	Greylag goose	Sanderling
Bioluminescent dinoflagellates	Gulper shark	Sandwich tern
Birds of prey	Haddock	Sandy ray
Black corals	Halibut	Scallop
Black s	Harbour seal	Sea eagle
Blackcap	Hares	Sea lice
Blackmouth catshark	Hedgehog	Sea lions

Black-tailed godwit	Herring	Sea pen
Blonde ray	Horse mussel	Sea snails
Blue shark	Humpback whale	Sea trout
Blue whale	Invertebrates	Sea urchin
Bluefin tuna	Irish hare	Sea-fan anemone
Bluntnose sixgill shark	John dory	Seals
Boar	Kaleidoscope jellyfish	Sedge warbler
Bottlenose dolphins	Kestrel	Shagreen ray
Bottle-nosed skate	Killarney shad	Sharks
Brant	Kingfisher	Shearwater
Brent geese	Kite sharks	Shelduck
Brill	Kittiwakes	Shellfish
Brown trout	Krill	Shortfin mako shark
Butterflies	Lampreys	Short-snouted seahorse
Catsharks	Lapwing	Shrews
Celtic Sea herring	Leafscale gulper shark	Shrimp
Cetaceans	Limaria hians	Silver roughy
Chimaeras	Little egret	Skate
Choughs	Little tern	Skylark
Clams	Lobster	Smelt
Cockles	Long-finned pilot whale	Smoothhound sharks
Cockscomb cup coral	Long-nose skate	Sperm whales
Cod	Long-snouted seahorse	Spiny dogfish
Common chiffchaff	Lophelia pertusa	Spotted ray
Common eel	Lophelia pertusa	Spratt
Common Irish lizard	Mackerel	Spurdog shark
Common loon	Mallard	Squid
Common sandpiper	Manta rays	Stalked jellyfish stauromedusae
Common stingray	Manx shearwaters	Star fish
Common sturgeon	Meadow pipit	Starfish
Common teal	Merlin	Starry ray
Common tern	Migratory bats	Sternidae
Coral	Migratory birds	Stoats
Cormorants	Mink	Stouts
Corncrake	Moths	Thornback ray
Crabs	Mullet	Thorny skate
Crawfish	Mussels	Thresher shark
Crayfish	Narrow mouthed whorl snail	Thrift clearwing
Curlew	Natterjack toads	Tope shark
Cuttlefish	Northern fulmars	Turbot
Demersal fish	Northern gannet	Turnstone
Devil fish	Northern sea fan	Turtles
Dog whelk	Northern storm petrels	Twaite shad
Dolphin	Norway lobster	Twite
Dublin bay prawn	Norwegian skate	Undulate ray
Dunlin	Ocean quahog	Wading birds
Earthworms	Ocean sunfish	Walruses
Edwardsia delapiae	Octopus	Waterbirds

Eider	Orange roughy	Whale sharks
Electric ray	Ostrea edulis	Whales
Eurasian curlew	Oyster	Whip corals
Eurasian jay	Oystercatcher	White fish
Eurasian teal	Pacific purple sea urchin	White skate
Eurasian treecreeper	Pelagic fish	Whooper swan
European eel	Peregrine falcon	Wigeon
European shag	Pholadidae	Wild deer
European smelt	Pink sea-fan	Wildfowl
Fan mussel	Pintail	
Field mice	Plaice	
Fin whale	Plankton	

B.3   Habitat Types

Stakeholders mentioned the following areas as ones that should be specifically monitored and protected by the establishment of MPAs:

Abbysal areas	Feeding grounds	Peat habitats
Areas inhabited marine Mammals	Fields	Pelagic sites
Basking shark habitat	Fishing grounds	Pertusa reefs
Bathyal zone	Foraging grounds	RAMSAR sites
Bays	Foreshore	Rare machair habitats
Beaches	Forests	Riparian habitats
Belgica mounds	Freshwater	Rivers
Benthic habitats	Grey dune	Rock pools
Biogenic cold-water reefs	Harbours	Rocky reefs
Bird habitats	Hydrothermal vents	Sabellaria spinulosa reefs
Blue carbon habitats	Inland waterways	Saltmarsh
Blue flag areas	Inlets	Sandbanks
Brackish lakes	Intertidal Mytilus edulis beds	Seafloor
Breeding grounds	Islands	Seal habitats
Carbon rich habitats	Kelp forests	Seamounts
Carbonate mounds	Known hotspots for elasmobranch species	Seapen communities
Coastal islands	Littoral sand and muddy sand	Seaweed habitats
Coastal wetlands	Lower continental slope	Shallow beaches
Cold Seeps	Machair habitats	Shallow water habitat
Cold water corals	Maerl beds	Shipwrecks
Coral gardens	Mediterranean and Atlantic salt meadows	Skellig islands
Costal woodlands	Migratory routes	Soft substrates on the continental shelf
Deep-sea reefs	Modiolus modiolus beds	Spawning grounds
Deep-sea sponge aggregations	Morass	Sponge reefs
Derreen river	Nursery grounds	Sublittoral biogenic reefs
Drowned forests	Oceanic ridges with hydrothermal vents	Tidal mudflats
East coast sand banks	Oceanographic fronts	Tidal rapids
Energy facilities	Offshore pelagic sites	Wetlands

Estuaries	Ostrea edulis beds	Zostera beds
Floodplains	Oyster and mussel reefs	

B.4   Suggested Locations for Consideration as MPAs

Ballisodare River	Kenmare River	River Erne
Bandon River Estuary	Little Brosna River	River Finn
Bantry Bay	Lough Carra	River Foyle
Barna	Lough Foyle	River Glyde
Blacksod Bay	Lough Hyne	River Inny
Blasket Islands	Lough Swilly	River Lagan
Boyle River	Machair on Omey Island	River Laune
Brandon Bay	Maharees	River Lee
Bray	Malahide	River Liffey
Bullock Harbour	Merrion Gates area	River Maigue
Carlingford Lough	Mulkear River	River Moy
Carlingford Shore	Mulroy Bay	River Nore
Clew Bay	Oriel bank	River Robe
Coliemore	Portmagee Channel	River Shannon
Connemara	Portrane	River Slaney
Coomnahorna River	Renard strand	River Suck
Coper Coast	River Annalee	River Suir
Cork Harbour	River Bandon	Roaring Water Bay
Derrynane Bay	River Bann	Rockall Bank
Derrynane National Historic Park	River Barrow	South DLR
Dundalk Bay	River Blackwater	Suir Estuary
Errisbeg	River Blackwater	The Celtic Sea
Fane River	River Boyne	'The Raven', Wexford
Galway Bay	River Boyne	Tralee Bay
Glenbeigh	River Bride	Tramore Strand
Inch Beach	River Brosna	Valentia Harbour
Incherea	River Clare	Wicklow Coast
Irish Shelf Front	River Dee	
Kenmare Bay	River Deel	