



Fair Seas Ireland's submission to:

The Citizens' Assembly on Biodiversity Loss

Fair Seas is a coalition of Ireland's leading environmental non-governmental organisations and networks seeking to protect, conserve and restore Ireland's unique marine environment.

Submitted 09/09/2022

An audio narrated version of this submission can be found [here](#).

(timestamps: **Q1**: 0.00 / **Q2**: 5.06 / **Q3**: 7.45 / **Q4**: 17.22 / **Q5**: 18.54 / **Q6**: 19.34)

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1. What are your views on the international, European, national, regional and local dimensions to the biodiversity emergency?

The global biodiversity crisis is apparent at, and therefore, must be tackled at the international, European, national, regional and local level.

A Whole of Society, Whole of Government approach is needed, from driving change in attitudes and behaviours at an individual and societal level, to effective governmental action and international collaboration on species and habitat conservation.

Much of the general public are well aware of the decline of their local wildlife, and are eager to see it restored. A Fair Seas commissioned online opinion poll¹ found that 78% of respondents support greater legal protections for the sea, while 99% of public feedback on the '*Expanding Ireland's Marine Protected Area network*' advisory report² was positive, indicating broad-scale support for MPAs among the people of Ireland. However, for decades successive Irish Governments have been slow to catch-up with public feeling on this issue, resulting in the continued decline of vulnerable plants and animals on the Island.

At a national level, the Irish Government must treat the decline and loss of Ireland's biodiversity as the crisis and emergency that it is. This includes taking action to incentivise behaviours and processes that benefit and restore biodiversity, as well as halting activities and penalising sectors which are responsible for biodiversity loss and decline.

In our seas, this means designating and effectively managing an ambitious network of Marine Protected Areas (MPAs) which will provide proper protection for our most prized marine wildlife and places, and allow them not only to survive, but to thrive, as we give these species the environmental 'head room' to recover.

At a European and international level, the Irish Government must firstly, **follow through and properly implement** various existing agreements and policies which have been designed to protect nature. For the marine environment, most notably this includes achieving 'Good Environmental Status' (GES) as described in the Marine Strategy Framework Directive (MSFD) which aims to deliver ecologically diverse, dynamic oceans and seas which are clean, healthy and productive. Much of Ireland's biodiversity decline and loss over the past few decades could have been mitigated had sufficient political will and leadership been shown to simply do what the Government had already agreed to do.

¹ [Ireland's connection to the sea and the calls for "urgent action". Fair Seas online opinion poll results. \(2021\).](#)

² [Expanding Ireland's Marine Protected Area Network. A report by the Marine Protected Area Advisory Group for the Department of Housing, Local Government and Heritage October 2020.](#)

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Evidence 1.1: [Fair Seas and Eco Eye. Why Ireland Needs Marine Protected Areas \(video\)](#)



Ireland only has 2.3% marine protected areas. In this video, Ellen MacMahon (SWAN and Fair Seas) speaks to Eco Eye and explains why Ireland needs to reach 30% protection for Irish waters by 2030.

Evidence 1.2: [Using seagrass to fight the climate emergency | WWF \(video\)](#)



Together with Sky Zero and Swansea University, WWF planted 750,000 seagrass seeds which will grow into an ocean meadow fighting climate change and providing a home for marine life. From scientists, to volunteers, to local schools and communities, hundreds of people have come together to restore our oceans.

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Secondly, the Irish Government **must show true environmental leadership** on the global stage. As an island nation, Ireland must not only fulfil the Programme for Government commitment to *'realise our outstanding target of 10% under the Marine Strategy Framework Directive as soon as is practical and aim for 30% of marine protected areas by 2030'*, but also invest heavily in active restoration programmes of our most vulnerable and biodiverse coastal habitats and endangered species (e.g. seagrass, skates, sharks, saltmarsh, kelp, biogenic reefs, seabirds) designed to make our seas more abundant, diverse and healthy.

2. What are your views on the threats presented by biodiversity loss and the opportunities to reverse this loss?

The overwhelming threat posed by the ongoing, and ever worsening biodiversity emergency is the loss of valuable ecosystem services which are provided for us by nature. Ecosystem services are the many and varied benefits to humans provided by the natural environment, without which this planet would be uninhabitable for human life.

The loss of marine biodiversity in particular, threatens some of the most important ecosystem services such as;

- climate regulation;
- nutrient cycling;
- coastal and flood protection;
- and food provision.

Marine biodiversity and ecosystems underpin a healthy planet as well as good social well being. Therefore, it is vital Ireland takes **ambitious and strong steps towards** the effective conservation and restoration of our seas and wildlife.

Evidence 2.1: [Marine biodiversity and ecosystems underpin a healthy planet and social well being \(blog\)](#)

“In no other realm is the importance of biodiversity for sustainable development more essential than in the ocean. Marine biodiversity, the variety of life in the ocean and seas, is a critical aspect of all three pillars of sustainable development—economic, social and environmental—supporting the healthy functioning of the planet and providing services that underpin the health, well-being and prosperity of humanity”

Nature and wildlife also **have value beyond the ‘services’** they provide for humans and society. Nature has an intrinsic value and right to live free from human disturbance or harm on this planet. The many policy and legislative drivers on a local, national and international scale, oblige the Irish Government to act for nature, but most of all, the Irish Government should act positively for nature because it is the right thing to do.

We have already failed future generations by allowing unprecedented levels of biodiversity loss and decline to go on for so long. We now have a duty of care and stewardship, to do all we can to put a halt to biodiversity loss and oversee the beginning of nature’s recovery on and around this island.

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Evidence 2.2: [We need IMMEDIATE action to stop extinction crisis \(video\)](#)



Below is a powerful video produced by the BBC featuring Sir David Attenborough on why we need immediate action to stop wildlife extinctions. The video references six key areas which need to be addressed to tackle the biodiversity or extinction crisis: Illegal wildlife trade; Overfishing; Population and consumption; Pollution; Destruction of natural habitat; and Climate change.

3. What are your views on the main drivers of biodiversity loss, their impacts and the opportunity of addressing these drivers?

Drivers of biodiversity loss

Ireland's own Marine Strategy Framework Directive (MSFD) assessment in 2020³ concluded that the most significant man-made pressure on biological diversity in Ireland's maritime area is;

"the extraction of fish and shellfish...(both commercial and non-commercial species) and associated disturbance introduced by human fishing activity"

while;

"For larger marine vertebrate species (e.g., marine mammals, fish, seabirds, sea turtles)...the introduction of anthropogenic sound, disturbance of species, and input of litter are considered to present the greatest secondary pressures after commercial fisheries extraction".

and that;

"Climate change resulting from human economic practices, development and other activities, is also a significant driver with the potential to impact negatively on the marine environment".

The 2020 MSFD assessment's full list of current known pressures on Ireland's marine environment includes;

- Loss of, or change to, natural biological communities due to cultivation of animal or plant species
- Disturbance of species due to human presence
- Extraction of, or mortality/injury to, wild species (fishing activities)
- Physical disturbance to the seabed
- Input of nutrients, organic matter or other substances
- Input of litter
- Input of anthropogenic sound

³ [Marine Strategy Framework Directive 2008/56/EC](#)

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Impacts of biodiversity loss

The impact of marine biodiversity loss can be divided into species, habitat, ecosystem and food-web impacts which are all in different ways linked to changes in species or habitat distribution, abundance, behaviour, reproductive success, community composition and productivity.

Ultimately however, when biodiversity loss occurs at levels beyond the ecosystems' ability to function properly, rejuvenate and recover from damage of pressures, then there is greater likelihood of;

- Species population decline including local, regional or global extinctions;
- Disturbance and displacement of species from their natural habitat and range;
- Increased vulnerability to disease and and invasive species;
- Reduced feeding, social and breeding opportunities;
- Reduced levels of successful reproduction;
- Loss of ecosystem functioning;
- Reduced provision of ecosystem services to society.

Evidence 3.1: [A Letter From the Sea by Fair Seas](#)



A letter from the sea calling on the citizen's of Ireland to properly protect and care for our seas and wildlife.

Opportunities to address drivers and impacts of biodiversity loss

Recommendation (1): Designate and manage at least 30% of Irish waters as a Marine Protected Area

The Irish Government committed to expanding Ireland's network of Marine Protected Areas (MPAs) in its 2020 Programme for Government, stating *'We will realise our outstanding target of 10% under the Marine Strategy Framework Directive as soon as is practical and aim for 30% of marine protected areas by 2030'*⁴.

It is only when designated areas *are* effectively managed for nature and achieving their conservation objectives, that they can positively contribute to reversing biodiversity loss. Unfortunately, the extent and the quality of Ireland's current MPA network is poor, with only 2.1% of Ireland's seas designated, and many sites lacking adequate management⁵. Therefore, it is essential that the Irish Government fulfil previous environmental and biodiversity commitments, and begin the MPA legislative and designation process as soon as possible.

Recommendation (2): Implement ambitious marine conservation measures to ensure 'Good Environmental Status' of Ireland's seas

Ireland failed to achieve Good Environmental Status under the Marine Strategy Framework Directive (MSFD) for over half (6 out of 11) of the descriptors assessed in the latest 2020 report⁶. The failing descriptors include 'Biological Diversity' as well as others that are closely linked to biological diversity including 'Commercial fish & shellfish', 'Foodwebs', 'Sea-floor integrity', 'Marine litter' and 'Energy including underwater noise'. The MSFD is an important legislative driver for obtaining *'ecologically diverse, dynamic oceans and seas which are clean, healthy and productive'*. An ambitious suite of marine conservation measures, with adequate resourcing is needed to ensure Good Environmental Status for all descriptors is achieved.

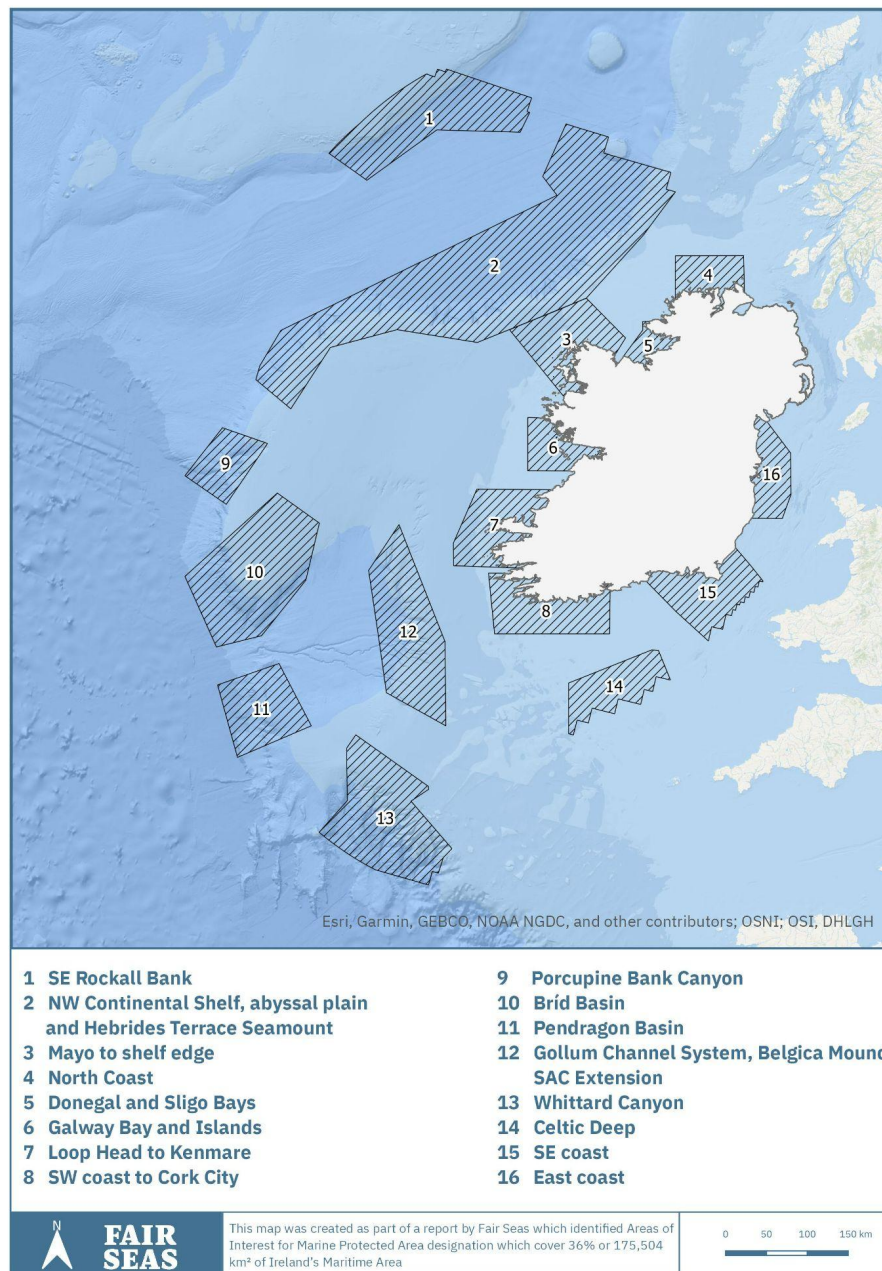
⁴ [Ireland's Programme for Government: Our Shared Future. 2020.](#)

⁵ [Expanding Ireland's Marine Protected Area Network. A report by the Marine Protected Area Advisory Group for the Department of Housing, Local Government and Heritage October 2020.](#)

⁶ [Marine Strategy Framework Directive. Update to Ireland's Marine Strategy Part 1: Assessment, Determination of Good Environmental Status, and Environmental Targets.](#)

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Evidence 3.2: [*Fair Seas recent 'Revitalising Our Seas' report identifies 16 'Areas of Interest' for MPA designation in Irish waters.*](#)



Evidence 3.3: [Summary of public responses to the Expanding Ireland's MPA network consultation \(infographic\)](#)



Figure 1 - Summary of feedback received to the public consultation

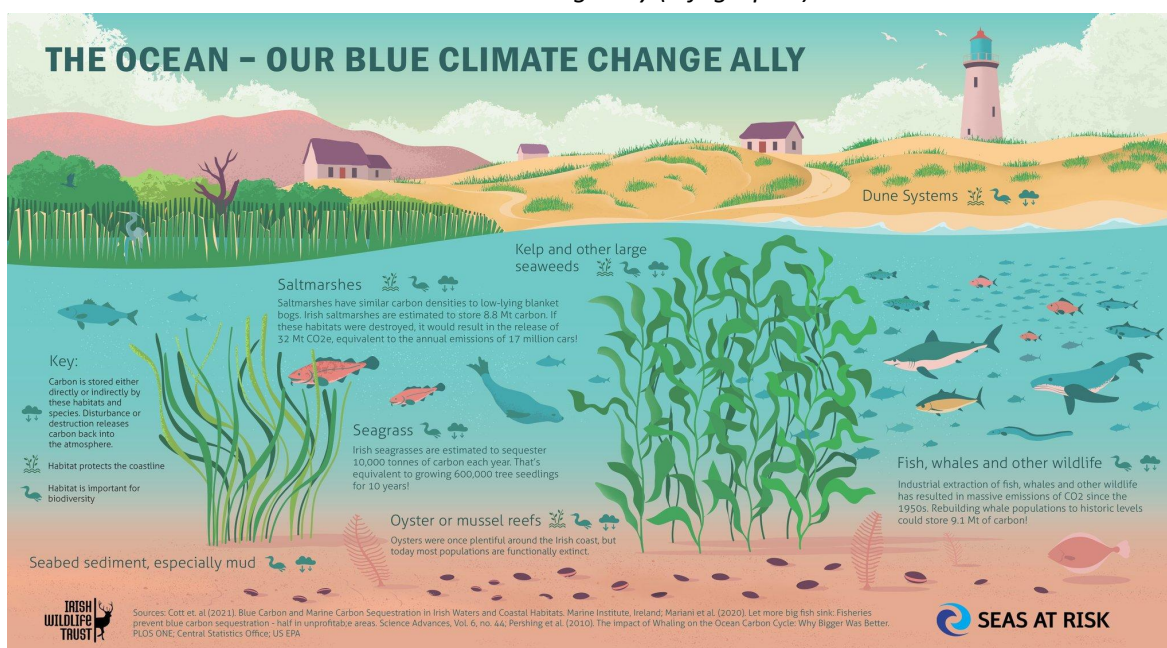
Evidence 3.4: [Respecting our seas: the quest for Good Environmental Status \(blog\)](#)

"The Irish Government has committed to designating 30% of Irish waters as MPAs by 2030. If we are successful (and that is a big if) – what then do we do with the other 70% of our seas? Aren't these areas also important for marine wildlife and ecosystem functioning? The simple answer is yes – we need to look after, respect and use all of our marine environment sustainably, not just inside protected areas"

Recommendation (3): Invest in restoration programmes to recover our most vulnerable and biodiverse coastal habitats and endangered species

Establishing priority habitat restoration zones, including a focus on ‘blue carbon’ habitats which help capture and store away carbon from the atmosphere (e.g., seagrass, saltmarsh, shellfish reefs), will help tackle Ireland’s biodiversity, water quality and climate crises. This process should be co-developed alongside the expansion of Ireland’s MPA network.

Evidence 3.5: *The Ocean - Our Blue Climate Change Ally* (infographic)



Recommendation (4): Review and amend the National Marine Planning Framework to ensure planning decisions are considerate of whole ecosystems

The Sustainable Water Network recently published an assessment⁷ of the National Marine Planning Framework (NMPF), and found that its lack of adequate spatial planning or ecosystem-based approach means the mistakes of poor planning on land risk being repeated at sea. Without an ecosystem-based approach to consenting and regulating activities and developments at sea, it is unlikely the NMPF will contribute positively to the achievement of Good Environmental Status in Irish waters. The NMPF needs to be reviewed and amended to explicitly address these concerns.

Recommendation (5): Implement an ambitious and effective National Biodiversity Action Plan to jumpstart nature’s recovery in Ireland

⁷ [Walsh, C. \(2022\) 'An Evaluation of Ireland's Marine Spatial Plan – The National Marine Planning Framework'. Sustainable Water Network \(SWAN\). May 2022.](#)

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Considering Ireland's seas are over seven times the size of its land mass, much of Ireland's biodiversity occurs in the marine environment. A new, ambitious and comprehensive plan to tackle Ireland's marine biodiversity loss is fundamentally important to the future health of our seas, as well as the survival of nationally and globally important species and habitats which are already rare, vulnerable and threatened in our waters.

Evidence 3.6: [*RTÉ Junior sets sail with Fair Seas \(podcast\)*](#)



For World Oceans Day RTÉ Junior met with Fair Seas scientist, Sarah Hegarty of Birdwatch Ireland. Sarah and the Ecolution Podcast go on a journey through our seas. Along the way, they meet jellyfish, underwater forests, whales, dolphins, sharks and much much more.

Recommendation (6): Pursue the full implementation of the Common Fisheries Policy to ensure fishing is sustainable, and MPAs are effectively managed

The rigorous and full implementation of the EU Common Fisheries Policy (CFP) is essential to achieve the sustainable management of all commercially exploited species. Putting an end to overfishing and driving the recovery of fish stocks, the CFP should also contribute to the protection of the marine environment, and in particular to the achievement of Good Environmental Status under the MSFD.

Fisheries management in current and future MPAs (offshore and inshore) is crucial to secure an ecologically coherent and well-managed network of MPAs. Fortunately, the CFP provides the mechanisms for implementing conservation measures within offshore and inshore MPAs, including fisheries management. However, to date these mechanisms are underused and failing. Ireland must pursue and implement all aspects of the CFP to help secure well-managed protected areas, healthy seas, and a strong, sustainable fishing industry.

4. What are your views on the opportunities to develop greater policy coherence and strategic synergies between biodiversity policy and other policy priorities including, but not limited to, economic development, climate action, sustainable development, agriculture and tourism?

Greater policy coherence and strategic synergies between biodiversity policy and other policy areas would be realised if;

Recommendation (7): Ireland creates a new Government Ministerial role for biodiversity, that amongst other things, facilitates a marine biodiversity National Coordination Body, and advocates for biodiversity at a cross departmental level.

Recommendation (8): Ireland creates a marine biodiversity National Coordination Body to have responsibility for the implementation of MPAs, the achievement of GES, and wider marine conservation and restoration initiatives.

Recommendation (9): Ireland enacts a Future Generations and Environment Bill which ensures that all future legislative and policy decisions in Ireland must account for its impact on the future generations of Irish people, Irish biodiversity, and the health of the environment.

Recommendation (10): On the international stage, Ireland commits to the Universal Declaration of Ocean Rights to legally recognise and protect the intrinsic value of the ocean.

5. What are your views on the opportunities to promote greater public understanding of, and support for, urgent action in response to the biodiversity emergency?

Greater public understanding of biodiversity loss can be realised through;

Recommendation (11): Nature, biodiversity and natural environment topics are taught as part of the mainstream National and Secondary school curricula in Ireland.

Recommendation (12): Greater involvement of Ireland's youth in policy and legislative decision making across Government, not solely confined to matters of the environment.

6. What are your views on the opportunities to improve the State's response to the challenge of biodiversity loss, how that response can best be resourced and implemented in a strategic and coordinated manner, and how progress can be measured?

The State's response to the challenge of biodiversity loss can be improved by implementing recommendations (7), (8) and (9) detailed above. Ireland should create a new biodiversity Ministerial role in Government, that amongst other things, facilitates a marine biodiversity National Coordination Body. The new Ministerial role should advocate for biodiversity at a cross departmental level, and have responsibility for the implementation of MPAs, the achievement of GES, and wider marine conservation and restoration initiatives.

Recommendation (13): Actions taken to tackle biodiversity loss should become Governmental 'core responsibilities' and funded in the long-term through the current budget system. However, the Government should explore additional revenue raising powers such as a biodiversity levy on industries profiting from the sea.

Contact:

Dr. Donal Griffin - Fair Seas Marine Policy Officer

donal@fairseas.ie / 0044(0)7746317885 / www.fairseas.ie