FAIR SEAS

Do you agree that a Northern Ireland Elasmobranch Conservation Strategy is necessary? Please provide further comments to support your answer

Yes, Fair Seas believe a Northern Ireland Elasmobranch Conservation Strategy is necessary and hopes that the Republic of Ireland may follow suit in time. With over 1200 species worldwide, elasmobranchs are known to play important ecological roles in their environments. However, as has been extensively studied, reported and monitored over recent years, their populations have been in steep decline globally. It is now estimated that overfishing is responsible for shark and ray populations declining by over 50% in the past 50 years with issues such as habitat degradation, pollution and climate change compounding the issue. One third of sharks, rays and chimaeras are now threatened with extinction and coastal species are among the most threatened.

Northern Ireland is home to at least 20 known species of elasmobranchs while the island as a whole is home or host to over 70 species. The diversity of species in Northern Irish waters is also likely to change with future range expansions due to climate change.

We welcome the creation of this strategy and with its potential to lead the way for other countries. We appreciate the need for additional research and ongoing monitoring and agree with the inclusion of these elements in the strategy, however we would strongly advocate for the inclusion of more direct, applied and robust actions for the preservation and restoration of these species.

Do you agree with the species listed in the strategy? If no, please provide any evidence you have on why certain species should be added/ removed from the strategy

While we agree the species listed in the strategy are in need of action, we recommend that the strategy target all Northern Irish elasmobranch species with the possibility of prioritising specific species with species-specific action plans, such as those already listed, in line with recommendations made by the IUCN Shark Specialist Group for example. This could take the form of triaging species with the most urgent needs given priority in a timeline of actions.

Additionally, we are concerned by the absence of more abundant species that are under intense fishing pressure such as the lesser spotted catshark. By not targeting all elasmobranch species, and excluding for example, dogfish species, the strategy lacks foresight and ambition. We believe the total diversity of elasmobranchs should be accounted for in a conservation plan allowing for not only responsive actions to the decline of species to be taken, but preventative and preservation measures too in response to ever changing threats and pressures. Moreover, with oceans undergoing extensive changes due to climate change, this strategy needs to be able to respond to associated shifts in elasmobranch distribution, behaviour and ecology. This, in addition to the potential discovery of the presence of additional species in northern irish waters thanks to ongoing research, we recommend that a provision for review of the species list in the Strategy be included.

Furthermore, we wish to see the criteria for inclusion of species outlined in a transparent manner, and a review process to allow for the list to be updated as and when species meet these criteria.

Do you agree with the aim of this strategy? Please provide further comments to support your answer

Aim: “Develop management guidance to aid with conservation measures for the 12 priority species identified in Table 1, while delivering on international obligations to protect and preserve the marine environment.”

Notwithstanding our response to the previous question regarding the species, we are concerned that this aim is non-committal and limited in nature: DAERA should be able and should aim to deliver more than just “guidance to aid”. The aim of the strategy should be to “deliver robust conservation and management measures to ensure the long term survival of elasmobranch species in Northern Irish waters, while delivering on international obligations to protect, preserve and restore the marine environment. Where evidence and knowledge are lacking, the strategy aims to provide the pathway to filling these gaps.”

Do you DISAGREE with any of the objectives that have been identified in this Strategy? Please tick all that apply. Blank answers will be assumed agreeable. Please provide further comments to support your answer

Objective 1 - “Establish robust baselines for all species included in the Elasmobranch Conservation Strategy”

In 2009, AFBI published a “Position statement on sharks, skates and rays in Northern Ireland waters” which identified a list of data sources for completion of a baseline study and which AFBI was commissioned to carry out by NIEA. It is not clear from the strategy that this baseline study was ever carried out. If it was produced, Objective 1 would be repeating work already done and wasting precious resources. Instead, it would seem pertinent to focus on updating this information. Additional sources of data that can be used to complete this information are likely to be found in the 2011 report by Marine Dimensions “An inventory of elasmobranch databases for Irish Waters” among others.

Objective 2 - “Identify the relevant threats and pressures to elasmobranchs in Northern Ireland waters”

While identifying specific pressures to elasmobranchs in Northern Ireland is welcome, we question whether this knowledge isn’t already existent as per the Summary of Consultation Paper which states “This Strategy [...] identifies the pressures and vulnerabilities faced by each species” along with a species-specific breakdown of threats in Annex 5. It is crucial for this strategy and this objective to commit to developing and introducing measures to alleviate these pressures, not just identify them.

It would also be pertinent to acknowledge that species do not know borders and that cross-border pressures impact elasmobranchs in Northern Ireland and therefore need to be factored into this analysis.

Objective 3 - "Assess and report on the current state of priority elasmobranch populations"

This appears to be redundant with objective 1 as it pertains to gathering baseline information. We suggest it should be merged into one objective.

Objective 4 - Consider options to further increase protection for elasmobranchs in Northern Ireland waters

We caution against the use of vague terms such as "consider" and "explore" which lacks commitment to actions and solutions. We would ask that this objective be rephrased to "Determine solutions and establish pathways to deliver these solutions to further increase protection".

Objective 5 - Identify gaps in existing mitigation measures for each of the elasmobranch species and support the development, trial and wider roll-out of novel approaches

The use of "mitigation measure" in this objective and throughout the document is vague and unclear. We suggest editing this to be more specific. For example, a more helpful term might be "conservation or management measure". In the case that this refers to bycatch mitigation measures, which we agree are a key element that must be included in this strategy, this should be stated explicitly.

Objective 6 - Ensure any mitigation measures are consistent with wider environmental objectives

See above. Additionally, the term "wider environmental obligations" is vague and clarity should be given as to what refers to (i.e. national frameworks and international obligations such as those mentioned in the "broader strategic context").

It is unclear what this objective aims to achieve: does this objective aim to ensure the consultation functions within existing environmental legislation or does it aim to ensure synergy and complementarity with other existing conservation efforts such as fisheries management or MPAs? This objective needs to be clarified and some elaboration brought to the wording.

Objective 7 - Evaluate the impact of mitigation measures on reducing bycatch and entanglement

Objective 8 - Establish approaches to managing wildlife interactions

This objective and its actions would benefit from international perspectives such as countries and places that are recognised as leaders in wildlife ecotourism and from which lessons can be learned. The wheel does not need to be reinvented and gaining perspectives from

already established successful practices will improve efficiency and effectiveness of any measures. In addition, we, once again, would like to see commitment to putting these approaches into place and enforcing them.

Objective 9 - Promote agreed conservation strategies to all relevant stakeholders

We are unclear as to the meaning of this objective and its timeline (June 2025 - 6 months from this consultation). Does this objective mean to promote the strategy, once finalised, to the stakeholders? Is this document suggesting that each of the species will have its own tailored conservation strategy developed for it in the coming years? If so, how does this fit within the stated timeline? This needs to be more clearly laid out.

Objective 10 - Agree a data sharing agreement with stakeholders

While we agree that data sharing agreements and MOUs are an essential part of working with stakeholders, we would suggest that this is not a conservation strategy objective. It should be stated in the Strategy document that these agreements will be put into place but objectives within this table should focus on pathways to achieving the conservation, preservation and restoration of elasmobranch populations.

Objective 11 - Develop enforcement/ protection protocols

This objective should be rewritten to provide more clarity and details as to the targets of these “protocols” as it is currently unclear if this refers to fisheries-related enforcement, public-wildlife interactions or others.

Do you consider actions 1.1-2.2 sufficient to meet objectives 1 and 2? Please provide further comments to support your answer

We would like to see the results from any previous baseline studies, as requested in the AFBI Guidance document from 2009, referenced in the strategy and expect that work should focus on updating these with up-to-date information and data, rather than starting the process from scratch. This updating process should be part of annual reviews of the strategy moving forward.

1.1 Data mining of all publicly available records of all elasmobranch priority species in NI waters by Q4 2024. As new evidence is generated, this will continue to be updated

1.2 Assess suitability of each elasmobranch priority species for inclusion on the final strategy document

As the final Strategy document will not be published until Q1 of 2025, we do not understand how this action fits into the timeline of the final strategy. Additionally, these actions (1.1 and 1.2) would have been necessary before the creation of this strategy to inform it, as evidenced by the development of the 12 species priority list, not as a conservation action resulting from it. As such, we would like to see a rewording of these actions to focus on regularly reviewing and updating the strategy based on newly collected data and information.

2.1 Vulnerability/ sensitivity analysis from MarLIN will be reviewed and resolved where missing for certain species by Q2 2025

2.2 Map VMS up to 2026 to highlight where fishing overlaps with spatial distribution of NIPS

These actions (2.1 and 2.2) are welcome and we wish to see an additional action committing to developing and introducing new pressure alleviation conservation management on the back of the identification of threats and pressures. We would also wish to see any mapping produced to include other overlapping impactful activities such as offshore renewable energy and major shipping lanes, for example. It is also unclear as to the justification for mapping data until 2026 only, this needs to be made clear as continual monitoring of fisheries overlap with elasmobranchs in order to put in place appropriate management measures (the development of which must be included as an action) is a crucial part of the long term conservation this strategy is aiming to achieve.

Do you consider actions 3.1-5.2 sufficient to meet objectives 3-5? Please provide further comments to support your answer

3.1 Analysis of abundance trends over time to highlight current trajectory of each species by Q4 2024

3.2 Identify knowledge gaps to improve the evidence base and data availability of elasmobranch distribution outside of known spatial distribution within Northern Ireland waters

As these actions refer to establishing baseline knowledge and data, we believe they should be merged with Objective 1, as previously stated. Additionally, we wish to see all objectives and actions organised in a more coherent format showing efficient progression through the inclusion of a timeline of delivery.

4.1 Explore methods to identify critical habitats for elasmobranchs by Q3 2025

4.2 Explore different types of spatial management that will achieve a beneficial outcome to sensitive elasmobranch species both in the inshore and offshore regions

We strongly agree with the need to identify critical habitats for elasmobranchs and welcome the inclusion of these actions. As mentioned previously, we would like to see these actions rewritten, removing non-committal language, to:

“Identify known critical habitats for elasmobranchs and establish a pathway to fill identified knowledge gaps by Q3 2025”

And

“Identify which types of spatial management will best achieve a positive outcome for elasmobranch species both in the inshore and offshore regions”

It should be noted here that the IUCN Shark Specialist Group Important Shark and Ray Areas Project has been working internationally to identify known critical habitats of elasmobranchs and has been doing so region by region. The Northeast Atlantic assessment will be undertaken in 2025 and would be a crucial step towards achieving action 4.1, we would wish to see engagement with this process identified as a deliverable in the Strategy.

Additionally, cross-border and transboundary cooperation will be essential to the successful completion of this objective and we recommend the creation of an additional action:

“Work cooperatively to deliver transboundary spatial conservation management for elasmobranch in Northern Irish and neighbouring administrations.”

5.1 Work through different forums (both domestically and regionally) to identify opportunities to scale-up existing effective mitigation measures

5.2 Develop, trial and adopt new mitigation measures for each elasmobranch species by 2028

The use of “mitigation measures” is unclear in these action statements and we ask that precision or modification be provided. In the case that this refers to bycatch mitigation measures, we strongly welcome these actions as an essential conservation action for elasmobranchs for which bycatch has been identified as one of the biggest threats. We would like to see a list of the mentioned “different forums” to be included within the final document as the current wording remains vague so that it reads:

“Work with partners identified in Table X to scale-up existing effective bycatch mitigation measures”.

Do you consider actions 6.1-7.2 sufficient to meet objectives 6 and 7? Please provide further comments to support your answer

6.1 Consult regularly with stakeholders, eNGOs, the Fishing Industry and Fishing Communities. The working group will meet annually to review the action plan delivery against wider environmental obligations

Fair Seas welcomes the stakeholder engagement element of the development and publication of the strategy and looks forward to a continued engagement process with all stakeholders throughout the implementation of the strategy.

The term “wider environmental obligations” is vague and clarity should be given as to what it refers to (i.e. national frameworks and international obligations such as those mentioned in the “broader strategic context”).

7.1 Establish monitoring programmes that draw in experience from other DAERA and AFBI teams, consult with stakeholders

7.2 Explore outcomes from previously funded bycatch mitigation projects by Q2 2025

In action 7.2, we would like to see commitment to action resulting from the outcomes rather than a simple exploration.

Do you consider actions 8.1-11.1 sufficient to meet objectives 8-11? Please provide further comments to support your answer

8.1 Consult with stakeholders on best practices around wildlife ecotourism (WiSe) by Oct 2025

8.2 Conduct outreach events and programmes with stakeholders and public

8.3 Promote education and awareness through citizen science

Whilst we agree that establishing best practices and the engagement of stakeholders is essential to the delivery of this objective, we feel it would be important for a conservation action to commit to rolling out these best practices through the development or adoption of compulsory training programmes in the relevant industry. This should be made clear in action 8.1 or by the addition of an action point.

Citizen science refers to “research carried out by members of the public who volunteer to collect scientific data” and is not to be confused with outreach and education initiatives to improve ocean literacy, though they can go hand in hand. We recommend rewording of action 8.3 as it is unclear whether this action’s deliverable is data collection or increased ocean literacy. If the latter is the deliverable, it is redundant with action 8.2.

9.1 Social media and press campaign to highlight agreed conservation measures by June 2025

Fair Seas believes that engaging the public is an essential part of conservation success and welcomes the inclusion of this in the strategy but, as mentioned previously, this objective and associated action are vague and unclear in their scope and need development.

10.1 Facilitate sharing of data and ensure metadata meets appropriate standard

As previously mentioned, while we agree that data sharing agreements and MOUs are an essential part of working with stakeholders, we would suggest that this is not a conservation strategy action. It should certainly be stated in the Strategy document that these agreements will be put into place, including agreements on data format standards, but objectives within the action table should focus on pathways to achieving the conservation, preservation and restoration of elasmobranch populations.

11.1 Provide advice on relevant legislation pertaining to each species and the process of reporting a wildlife crime

It is unclear to whom advice is being provided and how. This should be elaborated on. We would wish to see this action prioritising the implementation of enforcement protocols, in

addition to "providing advice", as a critical component of this strategy without which its efficacy would be in serious doubt.

What do you see as the biggest challenge to protecting elasmobranchs in Northern Ireland waters? Please be as specific as possible

The biggest challenges to protecting many if not most of Northern Ireland's elasmobranch species are concerning overfishing and by-catch.

The strategy fails to address the issue of overfishing as one of the main threats and pressures to elasmobranch species in Northern Ireland. As a consequence, the strategy also fails to outline or adequately indicate additional fisheries or conservation management measures that will reduce the mortality of priority species due to this threat. In this regard, the strategy also fails to link or attempt to guide the development of relevant UK fisheries management plans which will be instrumental in guiding Northern Ireland's fisheries management in the future. The development of UK fisheries management plans which positively contribute to the conservation of elasmobranch species in Northern Ireland waters is vital for the success of elasmobranch conservation as well as this strategy.

While addressing by-catch mortality of elasmobranchs is addressed to an extent in the strategy, it does not go far enough in terms of outlining clear conservation actions to reduce this as a threat to elasmobranch species and populations.

Finally, to reiterate the point made previously, it would also be pertinent to acknowledge that species do not know borders and that cross-border pressures impact elasmobranchs in Northern Ireland. Therefore, the lack of proposed conservation actions to collaborate with other UK administrations as well as bordering neighbour countries is a concern and needs to be addressed sufficiently if this strategy is to be a success.

Do you have any other comments you wish to make?

There is surprisingly little mention of Northern Ireland's Marine Protected Area network and how it currently features in protecting elasmobranch species in Northern Ireland waters. Nor does the strategy give detail or propose actions as to how the Marine Protected Area network could be expanded (in terms of new MPAs, or the addition of elasmobranch features to currently designated sites) to help conserve elasmobranch species in Northern Ireland. This is something that needs to be addressed in the strategy, especially considering that the Northern Ireland MPA Strategy review is currently being finalised.

Fair Seas welcomes the stakeholder engagement element of the development and publication of the strategy and looks forward to a continued engagement process with all stakeholders throughout the implementation of the strategy.

The strategy must give more detail and clarity on the timeline by which each objective is to be completed, and when reviews and updates of the strategy will be undertaken.