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27 July 2021

Our Ref: EPAC-0921/letter

RE: Public Consultation on Expanding Ireland's Marine Protected Area Network

Dear Colleagues,

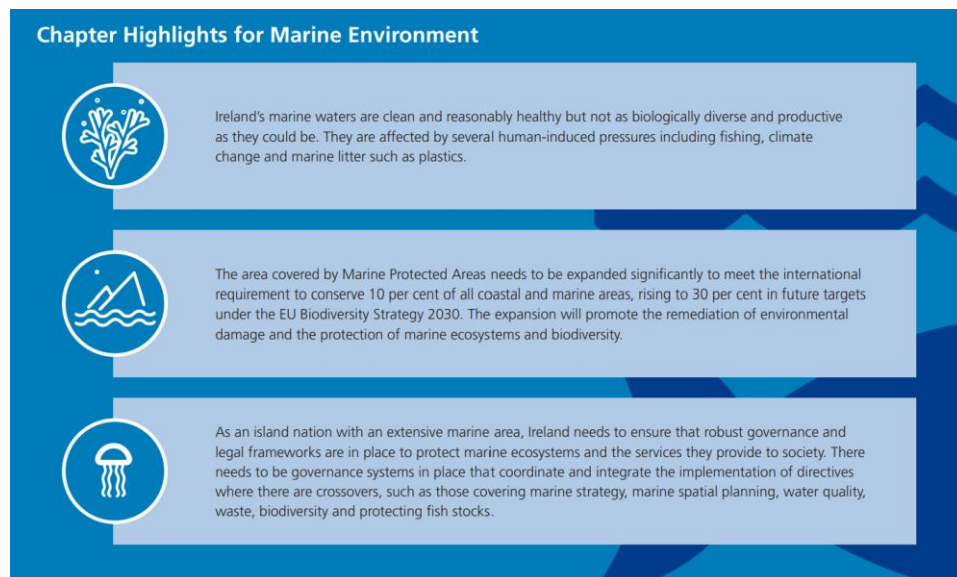
The EPA welcomes the opportunity to provide input to the consultation report 'Expanding Ireland's Marine Protected Areas'. The report is comprehensive and provides a clear and welcome intention to provide extensive details and widespread consultation and participation in the designation of MPAs. We have also completed the online survey which provides feedback that we trust you will find helpful (it is appended to provide for graphics and links).

There is an opportunity for water quality and water protection measures to be considered in more detail when deciding on Marine Protected Areas (MPA) designations. Only 38% of our estuarine waters are in satisfactory ecological condition, i.e. have high or good ecological status, and we now face significant challenges to achieve good water quality status in these waters. The water quality in Ireland's estuaries and coastal waters needs to be better protected through evidence-based measures, integrated water catchment-based projects and initiatives and by reducing the amount of nutrients ending up in these areas. The specific details and areas in need of protection are outlined in the EPA publications: Water Quality in Ireland 2013 - 2018 [Monitoring & Assessment: Freshwater & Marine Publications | Environmental Protection Agency \(epa.ie\)](#) and Water Quality in 2020 – An Indicators Report [Monitoring & Assessment: Freshwater & Marine Publications | Environmental Protection Agency \(epa.ie\)](#). Relevant maps and data are also available on the EPA Catchments website – www.catchments.ie

Clean and protected water quality should be considered a key goal in relation to MPAs as it is vital to healthy ecosystems. A criterion/objective covering the protection of water quality at high status water bodies (especially pristine areas) and designated areas through the MPA designation process would add further protection to these areas. We need to protect our waters against a range of human activities that cause water pollution and affect the physical and ecological integrity of water bodies and habitats. These human activities, together with climate change, continue to threaten the quality and ecological status of our waters. Proactive, coordinated and integrated land, coastal and marine planning, if implemented coherently at local, regional and national levels has the potential to not only deliver water quality improvements but also better environmental outcomes for other aspects of our environment such as biodiversity, climate, air quality and so forth. It is important that the designation of new marine protected areas is aligned with other relevant national policies, legislation and governance structures, including the Water Framework Directive, National Marine Planning Framework, Habitats Regulations and the wastewater discharge authorisation regulations.

The EPA's State of Environment Report: *Ireland's Environment - An Integrated Assessment 2020* (SOER 2020): [State of Environment Report | Environmental Protection Agency \(epa.ie\)](#), was published in November 2020 and identified 13 Key Messages for Ireland. In finalising the approach to expanding Ireland's Marine Protected Area Network, we suggest that consideration be given to the relevant

recommendations, key issues and challenges set out in the SOER 2020 report. The [Marine Environment](#) chapter supports the development of designated marine areas. Other key chapter messages as shown in the graphic below relate to 'reducing the human-induced pressures on the marine environment' and the need to 'ensure that robust governance and legal frameworks are in place to protect the marine environment' as an island nation with an extensive marine area.



We also wish to point out that you should fully consider, as appropriate, the requirements of the Strategic Environmental Assessment Directive (transposed as S.I. 435 of 2004, as amended) and the Habitats Directive, early in the process. We refer you to the EPA *Synthesis Report on Developing Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland* (and the pre-screening check contained within) to assist you in considering whether SEA is required: [Monitoring & assessment: Strategic environmental assessment | Environmental Protection Agency \(epa.ie\)](#)

The 'Expanding Ireland's Marine Protected Areas' report is a comprehensive consultation document that sets out criteria and recommendations for the protection of the best of Ireland's marine areas into the future. A stand-alone shorter summary document of the final Recommendations or Key Messages made by the expert group would also be helpful to make the work more accessible. We envisage that protected areas could include specific marine habitats or species, intertidal areas, estuaries, coastal waters and deep ocean ecosystems. We note that this consultation is just the initial step in the process. The big challenges will be around deciding on the site-specific locations of the MPA network, working out the pressures and actions for each site and then implementing site-specific protections. As mentioned in the consultation, the stakeholder interactions around all of this will be one of the most important pieces.

This consultation on protecting Ireland's estuaries, coasts and marine environment is of significant interest to the EPA. It crosses over many aspects of the EPA's work as outlined in our reply to the survey. Please do not hesitate to come back to Dr Robert Wilkes (r.wilkes@epa.ie) in the EPA if further detail or clarification is required on any aspect of this submission. Also, we are open to meeting with your team to discuss the work of the EPA, the reports and evidence base we have available and how we might be able to contribute to this important development.

Yours sincerely

Dr Jonathan Derham
Programme Manager
Office of Evidence and Assessment

Appendix: EPA feedback on the Survey - Public Consultation on Expanding Ireland's Marine Protected Area Network

Questions from the survey are in blue or green text. EPA replies are in black text.

Q1. In your opinion, what would a good and effective MPA look like?

EPA Reply

While Ireland's marine environment hosts exceptional ecosystems that support a rich and diverse population of flora and fauna, a key finding in the EPA's State of Environment Report 2020 was that Ireland's marine waters are not as biologically diverse and productive as they could be (SOER 2020 [Marine Environment](#) chapter). The marine environment also provides essential services to the people of Ireland but is affected by several human-induced pressures including fishing, climate change and marine litter such as plastics. A good and effective MPA network should fully meet the requirements of relevant legislation and directives including those covering the water, biodiversity and marine area. MPAs should also ensure that these designated areas meet the ecosystem status objectives that they were set up to achieve.

Our marine environment and the blue spaces they provide are now more important than ever. The COVID-19 pandemic has made us value our local environment including beaches and seas. There is an ever-growing body of research evidence continually reinforcing the fact that engagement and contact with our surrounding natural environment is associated with measurable improvements in the health and wellbeing of the population. It has been shown to have a positive influence on a range of health outcomes. By helping to prevent damage to our environment, we are, by association, protecting our own health.

Q2. The MPA report describes a wide range of approaches to area-based conservation or protection of the environment and nature, for example. By drawing on global, regional and national experience and evidence. In its Conclusions and Recommendations section (section 3.6.1) the expert group provides a definition (below) of what an MPA could be:

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.

Do you agree or disagree with the **proposed operational definition for MPAs** in Ireland that's given in the green text above?

EPA Reply

Somewhat agree.

Q3. If you don't fully agree with this definition, what elements or features you would **Change** or **Add** or **Delete** in it? (Please enter information in the box below)

EPA Reply

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, **water quality, environmental, human health benefits** and cultural values, and managed with the intention of achieving stated objectives over the long term.

Q4. The expert group's report recommends the inclusion of existing legally-protected marine sites (for example, Reserves, Special Areas of Conservation, Special Protected Areas for birds) as part of the future network of MPAs in Ireland.

Do you agree or disagree with this recommendation?

EPA Reply

Agree

Q5. If you don't fully agree with this recommendation, please tell us why? (Please enter information in the box below)

EPA Reply

We agree with the recommendation outlined in question 4.

Many estuaries, mudflats and coastal bays, etc., monitored by the EPA under the Water Framework Directive are already designated as SACs, SPAs etc. The designation of the existing Natura sites as MPAs would be seen as positive. It would bring new objectives that could further strengthen the protection of these areas, especially since several are already under threat from water pollution caused by nutrients and other pressures.

Q6. Part 1 of the MPA report considers why we should have more area-based protection of the marine environment in Ireland, and where there are important gaps or opportunities for improvement.

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? If so, please specify those animal/plant species and/or habitat types in the box below.

EPA Reply

Consideration should be given to the inclusion of significant coastal and estuarine habitats within the MPA network. The proposed network of MPAs should incorporate existing networks of coastal, estuarine and marine European sites and proposed sites. The network of RAMSAR sites should also be considered. Where feasible, MPAs should incorporate complexes of existing and proposed designated areas. Where existing national nature reserves extend to the coast, the opportunity to designate an MPA contiguous with these reserves should be considered. Where opportunities arise, the designation of MPAs in association with relevant adjoining jurisdictions should be explored.

Q7. Are there any **Other** ecosystem, oceanographic, cultural or other natural processes or features that you think should be afforded legal protection as part of the MPA network? (Please specify any such processes or features in the box below)

EPA Reply

The consultation provides an opportunity to make suggestions around the scope of MPAs. In response to this please find the observations and suggestions listed below:

The MPA network and associated Management Plans should recognise the role of water quality in maintaining habitats and species. The designation of the best examples of high status estuarine and coastal sites for water quality or high-status biological quality elements could be an option to consider. It could help protect the remaining pristine waters through new legal MPA objectives.

Almost two thirds (62%) of estuaries are in unsatisfactory condition and are in moderate (37%), poor (18%) or bad status (7%). This means they need improvement to meet the WFD standard of at least good status. The designation of estuaries as MPAs has links to the Water Framework Directive catchment-related work that aims to inform the improvement of these areas and reduce nutrient inputs. Nutrient inputs to the marine environment are increasing, as reported recently by the EPA. This challenge will be an important area to address in order to ensure the protection of MPAs. The setting of nutrient loading objectives for estuaries, for example, that are designated as MPAs might be another concept to consider.

EPA, and other, research around ecosystem services and natural capital could be taken into consideration as a criterion for designation. The full range of services provided by a potentially designated area should be taken into account including, for example, existing designations (Shellfish waters, Natura, other uses), wastewater disposal, potential carbon sinks such as the possibly of having areas designated as blue carbon sinks for example kelp beds, or areas that act as climate adaptation buffers or provide a flood protection role such as coastal saltmarsh areas. It is recommended that such, and other, co-benefits for the wider countryside should be taken into account when considering designations.

The Marine Protected Area consultation document should clarify whether designated shellfish areas and Shellfish Waters Pollution Reduction Programmes will be included in the Marine Protected Areas. Consideration should be given as to how these are accounted for in any MPAs and this process should be linked with the designation of shellfish areas.

Q8. As part of their consideration of various types of area-based protection in the sea and other approaches to conservation (see sections 1.1.6 and 1.1.7 of the MPA report) the authors describe an additional type of managed site that's not really designed with nature conservation in mind but that can still contribute to marine biodiversity and long-term area-based conservation.

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

Based on this information 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?

EPA Reply

Agree

Q9: If you don't fully agree with the inclusion of OECMs in an expanded MPA network, please tell us why?

EPA Reply

Not applicable in light of answer to Question 8.

Q10. In examining the basis and the process for expanding Ireland's network of MPAs, in section 3.6.3 of the report the expert group makes a series of 66 recommendations, broadly covering:

- Ecological considerations
- Societal considerations
- Stakeholder engagement
- Governance and management
- Legislation
- Other considerations.

These important findings and conclusions informed a set of 14 key principles (below) that are recommended by the group in order to chart a way forward that is rational, well informed, evidence-based and balanced.

Recommended key principles stated in the report of the MPA Advisory Group (Oct 2020):

1. MPAs should be designated and managed to form a network that is designed to be coherent, representative, connected and resilient and to meet Ireland's commitments under international instruments such as the EU's Marine Strategy Framework Directive, OSPAR Convention, UN CBD and Aichi Targets (particularly Target 11) and the UN Sustainable Development Goals (particularly Goal 14).

2. Objectives for MPAs and the MPA network in Ireland may focus on the protection and recovery of:

- Threatened or declining species or habitats
- Important or ecologically significant species or habitats
- Features representative of the range of features present in Irish waters
- Areas of high biodiversity, naturalness or sensitivity
- Areas contributing to maintenance of ecosystem functioning and ecosystem services including carbon sequestration
- Areas with significant biocultural diversity value

3. MPA site objectives may also focus on the prevention of impacts from specified pressures such as artificial light or noise or buffering against the effects of climate change.

4. Conservation is taken here to mean maintenance of or restoration to a state that is as close as possible to the expected structure and functioning of the ecosystem given the general physiography and location of the area or as compared to selected reference sites or states. In MPAs designated for biocultural diversity value, conservation of this value would be the primary objective.

5. Additional benefits of MPAs may include opportunities for research and environmental education and to create socio-economic added value, provided that these are not in conflict with the MPA site objectives.

6. A Systematic Conservation Planning (SCP) approach should be followed for planning, implementation and management of the expanded network, with a provision also for proposal of individual site-based MPAs.

7. In designing the network, consideration should be given to interactions with networks

designated by other States in the same marine regions.

8. Early and sustained stakeholder engagement should be integral to the selection and management processes for MPAs. Engagement should be inclusive and equitable, and the process should be designed to ensure that it is transparent, meaningful and facilitating.

9/10. Management measures should be established as appropriate for each MPA to achieve its stated conservation objectives and taking account of socio-economic and cultural considerations.

11. Management measures should be established as part of the designation process. Management of MPAs should be based on the best available evidence and on the precautionary principle.

12. Carefully designed monitoring should be used to assess efficacy of the network and inform periodic reviews and adaptations of designations and management measures.

13. It is recommended that a national coordinating body should be established with the authority to coordinate planning and implementation, to foster good governance and ensure close collaboration among relevant departments and agencies and synergy with related undertakings such as the National Marine Planning Framework.

14. New legislation is needed to establish the necessary framework for governance and management and appropriate resources and funding must be allocated to plan, implement, manage, monitor, and review the MPA network.

Do you agree or disagree with the recommended principles for the process of MPA network expansion that are given in the green text above?

EPA Reply

Agree

Q11: What would you **Change** or **Add** or **Delete** in these recommendations to help guide possible future steps in this process?

EPA Reply

EPA research projects could be of relevance especially those covering the coastal zone areas, climate adaptation and water protection in estuaries. Making use of existing research is an important aspect to consider. There are very many projects covering the protection of the coastal zone and marine environment. As well as technical research projects, these include community-based projects that could be particularly relevant, such as the EPA-funded UCC project that is considering coastal resilience in the context of Climate Change with a focus on the Maharees area. Details on EPA research reports covering the marine and related areas can be found on the EPA research projects database [EPA Research Database :: Environmental Protection Agency Ireland](#). The research publications available on the EPA website here - [EPA Research Publications | Environmental Protection Agency](#).

The MPA consultation has links with climate research and especially research on developing the knowledge base for carbon sequestration and adaptation. The Marine Institute is the lead organisation for marine research and we note for example that the Marine Institute has already commissioned a report called [Blue Carbon and Marine Carbon Sequestration in Irish Waters and](#)

[Coastal Habitats](#) to review and synthesise existing knowledge in relation to blue carbon and marine carbon sequestration in Irish waters and to identify critical knowledge gaps.

Under recommendation 1 above, emphasis could be given to aligning the design and enlargement of MPAs in Ireland with the EU Biodiversity Strategy for 2030 which is proposing legally binding targets for the protection and restoration of up to 30% of Europe's seas, as well as of 10% under 'strict protection' in 2021, including greater protection for the Marine Natura 2000 areas. Other aspects that could be included are the Water Framework Directive and the Marine Strategy Framework Directive.

Q12. Informed by the expert group report, what do you think are the most significant challenges to implementation of an expanded MPA network in Ireland?

There will need to be a robust governance and legal framework (at national level) for national designations and their protection. Legal provisions should clearly identify the statutory remit and responsibilities of consenting authorities. From a licensing and planning perspective (whether its aquaculture, foreshore, dumping at sea, wastewater discharge authorisations, etc.), the legal framework for conservation objectives must be supported with clear requirements to inform environmental assessments. Along with the need for clear objectives, clarity as to how management decisions are made in the context of a designation would be useful.

The list of identified stakeholders should include bodies responsible for safe disposal of waste water to the marine environment (e.g. Irish Water and EPA and CRU as the regulators).

There are already complex governance structures in place between organisations with responsibility for water, nature, the coastal zone and marine protection. It includes those with responsibility for the Water Framework Directive implementation (e.g. DHLGH, EPA, LAWPRO, LAs, IFI, etc), those with responsibility for nature (NPWS, DHLGH, LAs etc.), the marine environment (MI, SFPA, DHLGH etc.) and others. While there are lots of organisations involved, each having their own remit, there are overlaps across the responsibilities and expertise in relation to what each of these organisations covers. More could be done to make connections and coordinate implementation of environmental directives in the coastal and marine area.

The consultation document says there needs to be a national coordinating body who will manage MPAs and their 'conservation objectives'. The SOER 2020 message on the need for an overarching environmental policy is relevant here.



SOE 1: Environmental Policy Position
A national policy position for Ireland's environment.
ACTIONS – WHAT IS NEEDED?
There are many interlinkages and dependencies between environmental policies and legislation. These links could be better connected and reinforced through an integrated national policy position on protecting Ireland's environment.

The overarching message from SOER 2020 is that system-wide change is now needed in how we look after our environment. Biodiversity is at risk because of habitat loss and damage. Unspoilt areas are being squeezed out, our pristine waters are being lost and the habitats that provide vital spaces for biodiversity are diminishing. Not enough of our seas have been designated as marine protected areas. These are all major systemic issues requiring integrated, immediate and relentless action. These factors represent both a potential challenge but at the same time an opportunity to engage with key stakeholders and an appreciation by stakeholders/users of the importance of marine environments of the marine environment.

Effective implementation will be key to a fully functional, managed and protected MPA network. As reported in the EPA SOER 2020 there are lots of national plans and programmes that address individual environmental challenges, with many notable successes. To deliver the full intent and potential of these policies we need, however, to close gaps in implementation. These multiple plans also suffer from a coherence challenge as they are devised in the absence of a single, overarching, national environmental policy position. Ireland has many plans in place with environmental commitments and for various sectors, yet our environment continues to be affected. To ensure the plans and projects are being carried out in the right way, in the right place and at the right time we need them to be implemented, monitored and accountable. A national policy position for Ireland's environment could help to achieve all of this.

It is also important that the designation of new marine protected areas is aligned with other relevant national policies, legislation and governance structures, including the Water Framework Directive, National Marine Planning Framework, Habitats Regulations and the wastewater discharge authorisation regulations. It will be important that management of the MPAs is done in a coordinated manner with organisations responsible for the management of existing designated areas, e.g. Natura 2000 sites, shellfish areas, etc..

MPAs should be identified in the context of addressing the most pressing environmental issues while also generating significant co-benefits for society. The importance of both public participation and consultation in related designation processes is key. The report emphasises the role of stakeholders. Communications should include ensuring clarity for all stakeholders as to legal obligations as well as ecological needs of species and ecosystems. There are also roles here for citizen science and the National Biodiversity Data Centre in particular, for fisheries interests and for community groups and NGOs to help further collect data that will help to inform designations and conservation objectives of designated sites.

Q13. In Part 3 of the report it's recommended that a **Systematic Conservation Planning** approach be adopted for planning, implementation and management of the expanded network, with some scope also for individual site proposals. Key phases and steps in the proposed planning approach are described in section 3.3.4 (including Figure 3.2 & Figure 3.3) of the report.

Do you agree or disagree with the systematic, structured approach recommended by the expert group?

EPA Reply

Agree

Q14. If you don't fully agree with the structured planning approach recommended by the expert group, what elements or features would you **Change** or **Add** or **Delete** in the proposed method to guide the process of expanding Ireland's MPA network?

EPA Reply

Clarity on the role of each stakeholder within this SCP approach is needed. Each stakeholder needs to be given clear responsibilities within the MPA approach to ensure adequate resourcing and buy-in.

In the diagram (Figure 3.2) stakeholders need to be involved in each phase; they are currently not included in planning and review stages.

Q15. When you consider a structured approach like this, are there any elements or steps that you think should be **prioritised** over others?

EPA Reply


See comments below under further information (Q18) which may be relevant here.

The high-level integrated knowledge and key messages that are covered in the EPA State of the Environment report should be of assistance to this consultation process and the next stages of work on this project. The EPA publishes State of the Environment Reports (SOE) every four years and the most recent report, *Ireland's Environment - An Integrated Assessment 2020*, was published in November 2020: [State of Environment Report | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/publications/state_of_the_environment/state_of_the_environment_report_2020).


Ireland's Environment - An Integrated Assessment 2020 outlines the current state of Ireland's environment at a strategic and national level. In the report we identify what needs to be done in the next decade for a cleaner, greener environment. Covering thematic, sectoral and integrated areas, we outline the scale of the challenges to be tackled. The overall findings of the report are that:

- The quality of Ireland's environment is not what it should be; environmental indicators are going in the wrong direction across many areas and the outlook is not optimistic unless we accelerate the implementation of solutions across all sectors and society.
- Climate and biodiversity are two of the key challenges that Ireland urgently needs to address.
- An investment in the environment is also an investment in our health.


The conclusions section of the SOER 2020 report includes three key messages that are directly relevant to the consultation. They are:



SOE 8: Marine
Reduce the human-induced pressures on the marine environment.
ACTIONS – WHAT IS NEEDED?
As an island nation with an extensive marine area, Ireland needs to ensure that robust governance and legal frameworks are in place to protect the marine environment.

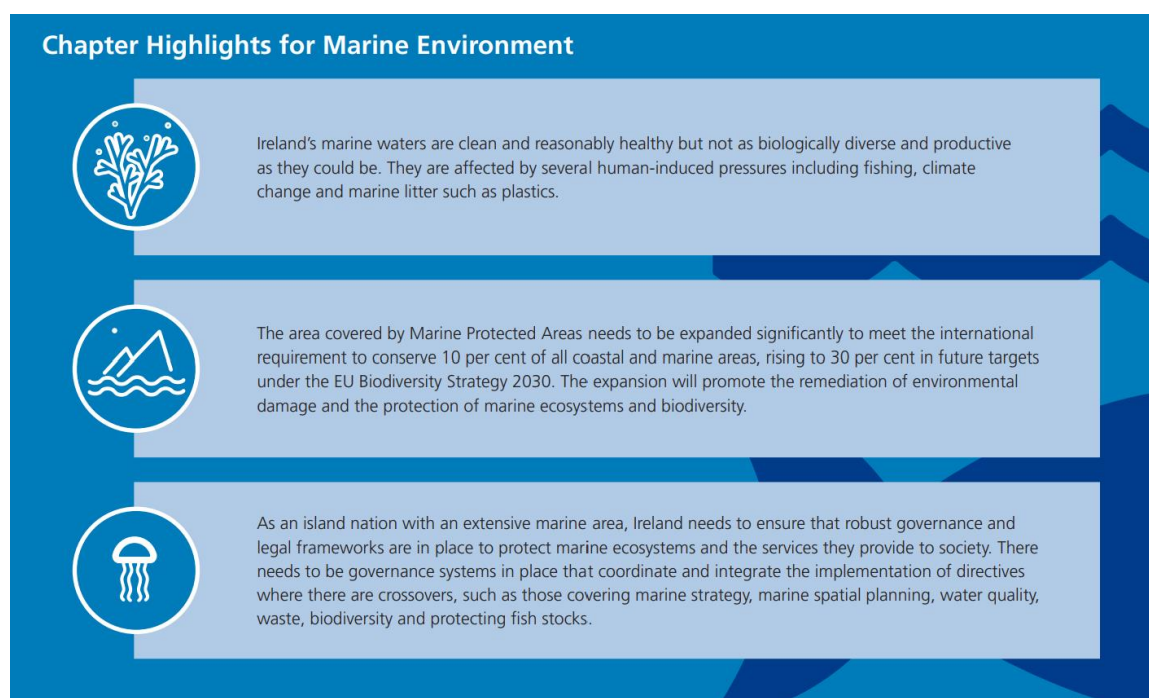


SOE 6: Nature
Safeguard nature and wild places as a national priority and to leave a legacy for future generations.
ACTIONS – WHAT IS NEEDED?
Nature and wild places are at risk in Ireland and need to be better safeguarded, both locally and in protected areas. The next Biodiversity Action Plan needs to be more ambitious and identify the pathway to transformative change for nature protection in Ireland. It needs to develop and further strengthen the protection of our national network of protected areas for future generations and to reverse wider current trends in biodiversity and habitat loss.



SOE 7: Water Quality
Improve the water environment and tackle water pollution locally at a water catchment level.
ACTIONS – WHAT IS NEEDED?
The water quality in Ireland's rivers, lakes and estuaries needs to be better protected through evidence-based measures, integrated water catchment-based projects and initiatives and by reducing the amount of nutrients ending up in water courses.

The EPA SOE 2020 report outlines the broad pressures on the marine environment. The marine environment is specifically covered in Chapter 8 Marine of the report [[State of the Environment | Environmental Protection Agency \(epa.ie\)](#)]. The need for marine protected areas is specifically mentioned as one of the highlights of the chapter - see graphic below.



The Marine chapter covers a broad range of issues that are important to the MPA report. These include ocean warming, sea level rise and coastal erosion, climate mitigation and adaptation including coastal protection and managed realignment. There are links between MPAs and the offshore wind energy sector in Ireland (this is covered in a topic box in the Energy chapter - see below for links to these chapters). Stopping pollution at source and preventing litter and plastics ending up in the ocean from land-based sources is also of relevance to MPAs (this topic is covered in several chapters - the Marine chapter, the Waste chapter and in the Environment, Health and Wellbeing chapter, links below). Also, micro and non-plastic pollution is highlighted as an area for future research in transitional/coastal waters.

Ocean noise is another important aspect for consideration (covered in the Marine chapter. and in the EPA research project STRIVE 120 - Assessment and Monitoring of Ocean Noise in Irish Waters ([Water | Environmental Protection Agency \(epa.ie\)](#))). Additionally, of relevance to the MPA consultation could be links to noise/quiet areas and unspoilt coastal areas that are important spaces for health and wellbeing (covered in the Environment, Health & Wellbeing chapter, link below).

Links to chemical and radioactivity monitoring in the marine environment are relevant to the MPA consultation (note a current EPA research project on 'Radioactivity in the Irish Coastal Environment (RICE) (2019-HW-MS-17)'). Control of chemicals to prevent bioaccumulation across marine ecosystems etc. is also relevant (see Topic Box 8.1: *TBT contamination in Irish coastal waters* in Chapter 8 of the SOE 2020 report as an example).

Chapters of the SOE 2020 report where details are set out of relevant issues, challenges and recommendations that should be considered in finalising the report include:

Chapter 2 Climate - [SOER Climate](#)

Chapter 6 Nature [SOER Nature](#)
Chapter 7 Water [SOER Water](#)
Chapter 8 Marine Environment [SOER Marine Environment](#)
Chapter 12 Environment and Energy [SOER Environment and Energy](#)
Chapter 14 Environment, Health & Wellbeing [SOER Environment, Health, Wellbeing](#)
Full SOER [SOER 2020 Report](#)

Q16. Regarding stakeholder involvement in the process, section 3.2 of the report describes the importance of recognising and understanding differences in personal or organisational interests, and in socio-economic, sectoral or cultural contexts, for example. It also examines how stakeholder and public participation in the MPA process can be fostered.

This work by the expert group, plus its engagement with a variety of representative organisations in Ireland (see Annex 1 of the report), informed the development of guidelines (below) for successful stakeholder participation in the MPA process.

General guidelines for successful MPA stakeholder participation processes stated in the report of the MPA Advisory Group (Oct 2020):

1. Identify and engage all relevant stakeholders early in the planning process.
2. Clearly define and communicate policy and scientific goals and objectives that are consistent with other legislative goals. This should also include clear communication both of what MPAs are and what they are not, generating a common understanding, as well as providing the political context.
3. Roles and responsibilities of all those involved in the planning need to be clearly defined and communicated.
4. Ensure that all involved understand the aim of the stakeholder participation process and provide clear rules, including aims and objectives, constraints, and codes of conduct (and consequences of not complying)
5. Providing science guidelines to ensure access to the best readily available scientific information, local knowledge, and spatial data by stakeholders, scientists, and decisionmakers should be treated as a joint fact-finding approach.
6. Conflict among interests of stakeholders should be anticipated and acknowledged and discussions facilitated without bias (e.g. by using trained third-party facilitators), using an approach such as the Community Voice method.
7. Anticipate media attention and allocate media and communication to a dedicated spokesperson.
8. Accept that the process will take time and afford that time to the process. The process needs to engage appropriate groups early and ensure a just transition in the short and long term. Developing a model of community co-management has been proven effective to facilitate this, provided that it is properly resourced and appropriate responsibility and accountability for governance remains with the State.
9. Make use of the existing context in which an MPA is planned. This includes working with existing organised structures (e.g., CLAMS (see Box 9), Regional Inshore Fisheries Forum (RIFF), Irish Islands

Marine Resources Organisation and use the National Marine Planning Framework and the mechanisms that it establishes.

10. Accept that the design of MPAs can change during the stakeholder process and keep in mind that the aim is to achieve policy goals and meet scientific and feasibility guidelines, while minimising potential socioeconomic impacts and find broad social support.

11. MPAs need to be carefully managed, monitored and evaluated. This involves detailed planning and financing.

12. Acknowledge that MPA development is not merely a “factual” process, but involves emotional, moral and value-based responses from all those involved.

13. Address potential power imbalances in the participatory process by facilitating an engagement/management model that acknowledges historical relationships and recognises inequities.

Do you agree or disagree with the general guidelines for successful stakeholder participation set out in the MPA report and provided in the green text above?

EPA Reply

Agree

Q17. When you consider the general guidelines for stakeholder participation (outlined in question 16), is there anything you would **Change** or **Add** or **Delete** in them to help guide possible future steps in the MPA process?

The importance of both public participation and consultation in related designation processes is key. The report mentions the role of stakeholders and this can't be emphasised enough. Making use of existing research is, we think, an important aspect to consider. There are very many projects out there looking at stakeholder involvement and community engagement that may be useful to this process.

There might be opportunities to cross check and learn from stakeholder process that are ongoing elsewhere such as the climate dialogue process, just transition and the WFD catchments process to improve water quality. In addition, international experience in designation.

Any information generated for the purposes of public consultation should be clear, concise and easily understandable. It may be necessary to summarise some information to make it more accessible and to encourage more participation from the public and key sectors.

If not already undertaken, a stakeholder mapping exercise should be undertaken to inform the scope and breadth of consultations.

Further comments

Q18. Do you have any further comments on the process of expanding Ireland's MPA network that you'd like to add, in order to inform this consultation? (Please enter information in the box below)

As mentioned under 'Guide to completing the survey', in order to get the best value out of your survey answers, it's essential that you make reference wherever possible to the relevant Part/section or Recommendation number in the MPA report that you wish to comment on.

EPA Reply

The Expanding Ireland's Marine Protected Areas report is a comprehensive consultation document that sets out criteria and recommendations for the protection of the best of Ireland's marine areas into the future. A stand-alone shorter summary document of the final Recommendations or Key Messages made by the expert group would also be helpful to make the work of the group more accessible. We envisage that protected areas could include specific marine habitats or species, intertidal areas, estuaries, coastal waters and deep ocean ecosystems. We note that this consultation is just the initial step in the process. The big challenges will be around deciding on the locations of the MPA network, working out the pressures and actions for each site and then implementing site-specific protections. As mentioned in the consultation the stakeholder interactions around all of this will be one of the most important pieces.

This consultation on protecting Ireland's estuaries, coasts and marine environment is of significant interest to the EPA. It crosses over with several aspects of the Agency's work. While the EPA is not the lead agency for the marine area, there are many links between the EPA's functions and the marine environment. Our remit includes: monitoring estuarine and coastal waters under the Water Framework Directive (WFD) and the OSPAR convention on protection of the marine environment of the Northeast Atlantic; chemical and radioactivity monitoring in the marine environment; EPA regulatory activities such as licensing (urban waste water discharges, industry discharges and dumping at sea) and bathing water regulation; the control of chemicals to prevent bioaccumulation across ecosystems; climate research, including carbon sequestration and climate adaptation along the coast; waste management to prevent litter and plastics ending up in the ocean; noise and quiet areas; and highlighting the importance of unspoilt and clean coastal areas for bathing, health and wellbeing. The EPA is also a designated environmental authority for Strategic Environmental Assessment (SEA). Our role in relation to SEA focuses on promoting full integration of the findings of the SEA into the plan and advocating that the key environmental challenges for Ireland are addressed.

The EPA has a national coordination role in monitoring estuarine and coastal waters under the Water Framework Directive. It also has a national role in preventing pollution from EPA licensed discharges in these areas. The EPA must consider nature designations and protected areas when carrying out its licensing functions. While many of the new MPAs could well be offshore, the coastal and estuarine ones are likely to be of most relevance to EPA work areas. MPA designations will be relevant for the licensing of urban waste water discharges, industry discharges and dumping at sea activities.

Many of the challenges listed in SOER 2020 facing us over the next decade could have links and interactions with the marine environment. These challenges include:

- Halting any further deterioration in our natural environment while supporting our economy and accommodating our growing population.
- Accelerating action to decarbonise and green our economy and society, so achieving climate neutrality by 2050.
- Protecting ourselves against the inevitable consequences of climate disruption.
- Starting to restore the precious habitats and water bodies that we have lost.
- Leaving space for nature as part of a new approach to biodiversity protection.
- Achieving greater efficiency in our production and consumption activities when using raw materials

- Acting on the highlights identified in '*Ireland's Environment: An Integrated Assessment 2020*'.

The overarching message from the EPA State of Environment report is that system-wide change is now needed in how we look after our environment (see also our response to Question 12 for more detail on this). Effective implementation will be key to a fully functional, managed and protected MPA network. As reported in the EPA State of the Environment Report 2021 there are lots of national plans and programmes that address individual environmental challenges, with many notable successes. To deliver the full intent and potential of these policies we need, however, to close gaps in implementation. These multiple plans also suffer from a coherence challenge as they are devised in the absence of a single, overarching, national environmental policy position. Ireland has many plans in place with environmental commitments and for various sectors, yet our environment continues to be affected. To ensure the plans and projects are being carried out in the right way, in the right place and at the right time we need them to be implemented, monitored and accountable. A national policy position for Ireland's environment could help to achieve all of this.

ENDS