

# **Response of the Department of Agriculture and Rural Development on Regional Project Recommendations for Offshore Marine Conservation Zones**

## **1 General Comments**

The comments that follow relate to the recommendations of the Irish Sea Conservation Zones Project.

We recognise the hard work and effort that was carried out to arrive at the current recommendations and the active involvement and commitment of the stakeholder representatives who participated in this process. We also accept the need for a network of MCZs in order to meet our international obligations to achieve good environmental status for the marine environment.

However, the Irish Sea is complicated by the number of Administrations that have responsibility for marine activities in the area and we are concerned that the recommendations made to DEFRA by the Irish Sea Conservation Zones Project are being made in isolation of developments elsewhere in the Irish Sea. In particular they may be implemented in advance of inshore marine planning and nature conservation powers being taken in NI and also independently of NI marine renewable energy developments, and indeed any similar plans in the South of Ireland. This carries the risk of failing to integrate these plans and ensuring that they are complimentary. This could result in environmental objectives being compromised and unnecessary disruption of marine activities that may have to adapt to the zones.

Two rMCZs lie within the Northern Ireland zone, and DARD has devolved responsibility for the management and development of commercial sea fisheries in this area and for fish processing that is dependent on Irish Sea fishing opportunities. We also own and manage the fishery harbours at Kilkeel, Portavogie and Ardglass on the East Down coast. The fish catching and processing sectors and ancillary businesses are significant employers in the East Down coastal area.

The two rMCZs that lie within the NI zone are South Rigg (rMCZ 6) and Slieve na Griddle (rMCZ 7). Both these rMCZs are actively fished by the NI fishing fleet operating out of fishing ports on the east coast of County Down. Since both zones include large areas of mud habitat and it is likely that management will include exclusion of bottom trawling, the major impact will be on vessels fishing for *Nephrops norvegicus* (prawns). Prawns accounted for 50.7% of the total value of fish landed into NI in 2010.

Apart from these zones the next most important zone for the NI fleet operating in the Irish Sea is the Mud Hole (rMCZ1). Again this includes large areas of mud habitat that is actively fished by the NI prawn fleet.

The remaining comments relate to the South Rigg and Slieve na Griddle zones.

## **2 Location**

Within the South Rigg and Slieve na Griddle zones are sea mount habitats that we agree could be important for conservation. They also include significant areas of mud habitat that host Nephrops. Whilst we understand the arguments for providing protection for mud we would question whether this is the optimum location for protecting mud habitat with regard to achieving environmental objectives and minimising impacts on marine activities, especially commercial fishing interests.

The size and shape of the zones were significantly affected by Territorial Sea boundaries and it is conceivable that had these constraints been absent different locations or sizes might have been proposed.

For example the sea mount features extend beyond the arbitrary boundary and a different size and location might take in more sea mount and have less impact on commercial fisheries.

In conclusion, for MCZs 6 and 7 it may be more appropriate for NI Departments and stakeholders to agree MCZs for the western Irish Sea that would compliment both the DEFRA network and whatever MCZs NI wishes to designate within its Territorial Sea following adoption of the NI Marine Bill. This would also allow for the integration of offshore renewable energy sites in the NI Territorial Sea and possibly reduce any unnecessary impacts on marine activities.

Any proposals need to be supported with robust scientific justification.

## **3 Displacement**

Displacement of the NI fleet could have a number of consequences. If the fleet fishes at its current level outside the zones there is risk that stock levels could be damaged. Currently the Irish Sea Nephrops grounds (ICES Area VII Functional Units 14 and 15) are fished sustainably at the Maximum Sustainable Yield (MSY) level.

If the MCZs resulted in exclusion of bottom fishing we could expect ICES to address the above issue by reassessing the stock available for fishing and conclude that Total Allowable Catch should be reduced in order to maintain fishing mortality at MSY.

Fishing in other areas such as the Celtic Sea, West of Scotland or the North Sea is unlikely to be an attractive or viable proposition for most vessels due to high fuel costs and/or the cost of acquiring fish quota for these areas.

#### **4 Economic Impact**

The draft economic impact assessment produced by the Irish Sea project team estimates an annual loss of bottom trawl landings from South Rigg and Slieve na Griddle of approximately £1.6m. Bottom trawling in this area can be assumed to be for Nephrops. Total landings of Nephrops into NI in 2010 amounted to £10.7m. Therefore the loss to the NI fishing industry is approximately 15% for these two areas alone excluding any landings into NI that may be lost as a result of restrictions placed on the Mud Hole zone in the East Irish Sea (estimated £1m/yr loss in bottom trawl landings), which would make the impact even greater.

It might be argued that vessels could make up this income outside the zones but for the reasons outlined under “displacement” this would not be sustainable in the long term.

DARD is currently seeking to address overcapacity in its nephrops fleet through a £4m vessel decommissioning scheme and due to the level of public funding involved the business case is being closely scrutinised by Department of Finance and Personnel NI. Should the scheme be approved it would remove a number of vessels with objective of releasing fishing opportunities to enable the remaining fleet to become more profitable and resilient. There is a risk that the MCZ proposals may necessitate consideration of further capacity reduction above what is currently envisaged.

Apart from the direct impact on the catching sector there will be impacts for shore based industry. The ISCZ Impact Assessment partly addresses this but does not appear to take account of “critical mass” effects. Among the questions that need to be answered are:

- Will a loss in landing on this scale result in closure of fish processing businesses?
- Will a loss in landings on this scale force DARD to restructure the NI Fishery Harbour Authority and possibly close one of the Fishery Harbours?
- What effect will the loss have on ancillary businesses such as net making, boat repair etc.?

Faced with a sizeable drop in fishing income we would expect the fleet to exert pressure for further rounds of fishing vessel decommissioning. By the time that decisions will be taken the new European Maritime and Fisheries Fund will be in

place. This Fund, as currently proposed, does not provide for public funding of fleet capacity reduction. We would therefore expect that such funding would have to come from national funds alone and that this would be subject to State Aid approval the outcome of which cannot be guaranteed. Finding funding for any additional scheme would put further strain on the NI Administration and there would clearly be a case for Westminster to fund this and possibly other costs for the NI Administration arising from the proposals.

## **5 Conclusion**

In conclusion DARD's view is that decisions on locating zones that would affect NI devolved fishing opportunities, especially those in the Northern Ireland zone of the western Irish Sea, should not be taken in isolation from marine planning in the NI Territorial Sea, or without the full involvement and agreement of the NI Departments and NI stakeholders.

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