The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF Northern Ireland, National Trust, Friends of the Earth, Irish Whale and Dolphin Group, and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Northern Ireland Marine Task Force response to: SEA Scoping Report
Submitted: 27th October 2023

NIMTF thanks the Department for Economy for the opportunity to respond to the SEA Scoping Report as part of the draft Offshore Renewable Energy Action Plan (OREAP). We are pleased to be part of the development of such an ambitious action plan. We are in a biodiversity crisis, with 12% of our local species are at risk of extinction[1]. We therefore need to ensure that any development at sea is not sacrificing the health of the marine environment. Our focus therefore is on ensuring that all potential impacts have been identified moving forward within the Scoping Report to ensure offshore wind development occurs in NI without compromising the marine environment. In succeeding with this, we will ensure good progress is made towards achieving ocean recovery within our local seas; allowing biodiversity to survive and thrive.

The UK is experiencing a nature and climate crisis and we need to ensure that we take the appropriate steps to reverse the impacts facing our marine environment. To do this, we need to involve a mitigation hierarchy of 'avoid, minimise, restore, compensate'; with appropriate planning focused on avoiding impacts where insufficient mitigation measures can occur. Only after any residual impacts which persist after avoidance and mitigation have been followed must compensation measures be used.

Question 1: Is there any information missing from the key plans and programmes listed, relevant to the draft OREAP that you think should be included, and why?

NIMTF are pleased to see the inclusion of a wide range of plans and programmes which have protection for nature at their heart and are pleased that all are being considered through the expansion of offshore renewable energy. The only key plan and programme which appears to be missing is the Kunming-Montreal Global Biodiversity Framework[2] (hereafter referred to as the Global Biodiversity Framework). One of its goals states 'By 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people'. The UK is signatory to the Global Biodiversity Framework and within a time where we are failing to meet Good Environmental Status[3] (GES) in our local waters, it is imperative that all marine developments have marine recovery at the forefront of planning; especially as the Northern Ireland Biodiversity Strategy 2015 - 2020 highlighted a failure to meet 83% of targets[4]. Meeting these targets is essential in tackling the biodiversity crisis, especially as many habitats and species are subject to cumulative pressures, resulting in further declines - such as 23 out of 24 of Ireland's breeding seabirds being red-listed or amber-listed within the Birds of Conservation Concern Ireland list 2020-2026[5].

Tackling the nature crisis at sea is made more challenging because of the fact we do not have a finalised marine plan for Northern Ireland in place; which would allow decision makers and planners to make environmentally appropriate choices for site selectivity. NIMTF have responded to the draft NI Marine Plan[6], highlighting the need for a spatially robust component which follows an ecosystem-based approach as the marine environment becomes busier as a result of the requirement for offshore renewables due to the Climate Change (Northern Ireland) Act[7]. In the absence of a finalised plan, it is important to follow the Precautionary Principle[8] and the Mitigation Hierarchy[9] as previously highlighted. The Precautionary Principle outlines a limit or prevention on an activity where data is minimal or deficient. The Mitigation Hierarchy outlines the process of appropriate site selection in order to avoid negative impacts, the minimisation of impacts where they do occur, mitigation measures where such impacts are unavoidable and strategic compensation as a final resort.

We are pleased to see upcoming strategies and plans mentioned such as the Blue Carbon Action Plan, the Elasmobranch Strategy and the Seabird Conservation Strategy within the SEA Scoping Report as these will give priority to addressing key issues within declining habitats and species in relation to conservation and climate change importance. However we note that the upcoming MPA Strategy Review has not been mentioned and have highlighted below where it would be appropriate for this response to appear. All of these upcoming strategies and action plans must be fully considered within the OREAP when released.

Question 2: Do you agree with the geographical and temporal scope of the assessment?

We agree with the geographical range that is currently in place for the NI inshore and offshore regions, but would request that the data considered also include a wider geographical area such as the Republic of Ireland, Isle of Man, Wales, England and Scotland within the scope of the spatial component. Providing wider data to the rest of the UK would be beneficial as this would allow data gaps in seabird migration patterns and foraging extent from further afield, present in NI. This would also relate to long-term monitoring of sharks, rays and skates as covered in the upcoming Elasmobranch Strategy.

We are currently in the UN Decade of Ecosystem Restoration[10], combined with information pertaining to UK waters not reaching GES alongside the decline of many species within the recent State of Nature Report, NIMTF would propose that the geographical range should consider the exclusion of marine protected areas from the outset for placement of offshore renewable arrays; with strong consideration to export cable corridors. Our focus should be on achieving ocean recovery and restoration to improve the condition of a number of priority features. NIMTF proposes that more detailed scoping is carried out within each MPA to gain a better understanding of how each protected area could be impacted moving forward. This would fall in line with the upcoming strategies and action plans as previously highlighted.

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1 https://stateofnature.org.uk/wp-content/uploads/2023/09/TP25999-State-of-Nature-main-report_2023_FULL-DOC-v12.pdf

2 Kunming-Montreal Global Biodiversity Framework (cbd.int)

3 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/921262/marine-strategy-part1-october19.pdf

4 https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Final%20Report%20-%20Northern%20Ireland%20Biodiversity%20Strategy%20to%202020.pdf

The temporal range covers the draft OREAP until 2030, however NIMTF would wish to see consideration for decommissioning alongside cumulative and in-combination effects past 2030. We are pleased to see mention within the Scoping Report that the draft OREAP is intended to become an iterative document, allowing for frequent updates as new data becomes available. NIMTF would like to see that even with the 5 yearly period for review, that there is potential for updates to be brought for review sooner than every 5 years if necessary. As the document refers to accounting for all potential environmental and holistic impacts and occurrences within the marine environment, NIMTF would propose that the entire document considers the lifespan of proposed project developments in all component processes (Planning, Construction/Installation, Operation and Decommissioning), not only for the short term (up to 2030), but to meet objectives past 2030. Site-specific ongoing disturbances also need to be scoped within the report throughout the entire planning process. NIMTF want to understand the processes by which cross-collaboration across the Departments ensures that short term impacts are balanced against long-term impacts.

Question 3: Do you agree with the scoping of the environmental assessment topics?

NIMTF welcomes the SEA Scoping Report covering numerous and extensive environmental assessment topics and we appreciate being able to take into account potential impacts prior to developments on a case by case basis provides greater strength to the mitigation hierarchy process. It is important to reiterate that the whole process of offshore renewable infrastructure needs to be considered fully within the environmental assessment topics - not just construction and operation, but decommissioning too. The combination of SEA topics under Biodiversity, Flora and Fauna has the potential to be quite limiting in relation to individual and cumulative impacts on protected habitats. NIMTF would like to see further subtopics where these SEA topics are split into relevant categories so that objectives can be cross-cutting as opposed to limited to a single sustainability objective.

Marine Protected areas are sights of significant importance for marine wildlife in NI waters, designated for a host of species & habitats. Upcoming strategies and plans like the MPA Strategy Review and Blue Carbon Action Plan have a focus on these designated areas, with a focus on blue-carbon habitats in the latter. NIMTF would propose the inclusion of the impacts of cabling and anchor design and their associated placements through intertidal and subtidal blue carbon habitats - such as native oyster reefs[11], seagrass[12], saltmarsh[13] and coastal sand and mud. The seabed itself has the capacity to lock carbon away, providing nature-based solutions to tackling the climate crisis. These vulnerable habitats are sensitive to hydrological changes but also to the impacts of embedding within the seabed - such as placement of anchors and laying of cables. For example, driven piles/gravity anchors have been shown to display reduced disturbance to seabed due to minimal impact footprint[14] when compared to drag anchors due to the area being impacted to result in embedding. It is important to highlight impacts for these habitats as they support a large biodiversity as well as having ecosystem benefits of sequestering carbon.

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[5] Gilbert G, Stanbury A and Lewis L (2021), "Birds of Conservation Concern in Ireland 2020- 2026". Irish Birds 9: 523-544.
[6] https://nimtf.files.wordpress.com/2018/08/ni-marine-plan-response-nimtf-final.pdf
[7] https://www.legislation.gov.uk/nia/2022/31/contents/enacted
[8] https://www.ospar.org/convention/principles/precautionary-principle#:~:text=A%20lack%20of%20full%20scientific,the%20needs%20of%20future%20generations
[9] https://www.google.com/url?q=https://offshore-coalition.eu/publications/rpsb-report-powering-healthy-seas-accelerating-nature-positive-offshore-wind&sa=D&source=docs&ust=1698150143620878&usg=AOvVaw3ixQsmC2LqceWOMjBZhPRP
[10] https://www.decadeonrestoration.org/

NIMTF shares concerns with its member, RSPB, regarding collision risk, barrier effects and displacement for seabirds, as highlighted within the Powering Healthy Seas report[9]. Appropriate site selection for offshore renewable energy infrastructure has the potential to reduce the impacts to vulnerable seabird populations already facing cumulative pressures, such as Highly Pathogenic Avian Influenza (HPAI). Displacement and disturbance extends to marine mammals that are particularly vulnerable to noise impacts throughout the offshore renewable development process. Cumulative noise pollution from developments will be one of the greatest impacts on marine mammals and sea turtles. Harbour Porpoise is a designated feature within the North Channel SAC; this species has been shown to respond to noise disturbance over relatively large areas, for example by moving away or changing activity patterns[15]. Associated noise from anchoring and piling has the potential to impact on these species, the use of gravity tethering has been shown in certain studies to have reduced environmental impact when compared to driving piling[14].

Developers and decision makers must plan appropriately to ensure both anchor and cable design and their designated corridors aim to reduce negative impacts to benthic environments through the mitigation hierarchy; negative impacts are avoided where possible, minimised where these are unable to be avoided and only mitigated against where the negative impacts cannot be further avoided. This also involves the decommissioning process, where there is a risk of double habitat loss around the destruction or removal of the artificial reef habitat which has been established on offshore energy infrastructure. Decommissioning within the marine environment is therefore more complicated than terrestrial decommissioning and requires a carefully planned approach, prioritising the needs of nature for recovery. Long-term monitoring strategies implemented for each project must inform both the environmental assessment regime required at the time of decommissioning and the works themselves.

NIMTF welcomes the addition of invasive and non-native species as another potential environmental issue for consideration. The removal of invasive and non-native species from within the marine environment is very challenging, so it would be welcomed to see a preventative approach in dealing with the risk. NIMTF would like to see SMART objectives outlining how this issue is going to be tackled within the draft OREAP.

Whilst this Scoping Report does not assess the natural capital of blue carbon habitats within the marine environment, the Marine Natural Capital Report (2023)[16] does provide some assessment to this, alongside Ulster Wildlife's Blue Carbon Feasibility Study[11] and an upcoming Blue Carbon Report by RSPB and The Wildlife Trusts (TWT), expected in November 2023. NIMTF would like to see natural capital assessed not only for the marine environment, but to have a role within the decision making process for Northern Ireland's contribution to the UK's natural capital[17].

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[11] https://www.ulsterwildlife.org/sites/default/files/2021-05/Blue%20Carbon%20Habitat%20Restoration%20in%20Northern%20Ireland%20-%20A%20Feasibility%20Study.pdf

[12] https://www.naturebasedsolutionsinitiative.org/wp-content/uploads/2023/06/Developing_UK_Seagrass_Carbon_Code_Summary_2023.pdf

[13] https://www.wwt.org.uk/uploads/documents/2023-01-30/wwt-blue-carbon-route-map-2023.pdf

[14] Potlock et al, 2023 - https://link.springer.com/article/10.1007/s00227-023-04240-1

[15] https://hub.jncc.gov.uk/assets/2e60a9a0-4366-4971-9327-2bc409e09784#:~:text=Harbour%20porpoise%20are%20sensitive%20to,away%20or%20changing%20activity%

[16] MANACA Report, 2023

[17] https://www.ons.gov.uk/economy/environmentalaccounts/bulletins/uknaturalcapitalaccounts/2022

[18] https://www.nienvironmentlink.org/ni-misses-deadline-for-environmental-improvement-plan/

[19] https://www.daera-ni.gov.uk/publications/list-northern-ireland-priority-species-2023

Question 4: Have we identified the key environmental issues relevant to the draft OREAP?

NIMTF would propose that a greater focus needs to be put on the marine environment and the vulnerable habitats and species which are in decline as shown within the latest State of Nature Report 2023[1]. Many of the species and habitats within the NI MPA network are not in favourable condition based on data coming from the 2014-2019 Condition Assessments (DAERA pers. corres.) and in order for designated, protected areas to fulfil their role, we need to ensure that the mitigation hierarchy is followed and impacts on nature are considered within site selection. It is these already designated sites that will contribute to achieving Good Environmental Status under the "Biodiversity" section, of which none of our waters are currently achieving.

It is important to ensure that cable design is also considered at all stages of the development process in relation to benthic structures and blue carbon habitats as these will play a key role as previously mentioned with tackling the climate crisis. To assist with the placement of cables to minimise impacts, we need a NI Marine Plan to aid in appropriate site selection. Alongside a lack of Environment Improvement Plan[18] linked to the Environment Strategy, it is important to follow both the Precautionary Principle and the Mitigation Hierarchy for new developments.

It is important that the SEA Scoping Report takes into account the upcoming legislation around the Blue Carbon Action Plan and the MPA Strategy Review - both of which need to be mentioned within "4.3.1.2.1 - Protected habitats". We are pleased to see the Seabird Conservation Strategy and Elasmobranch Strategy which have already been mentioned within the document, but it is important that the document has the flexibility to adapt to finalisations of these strategies and action plans.

Question 5: Are we proposing the most appropriate data and scale of data to be used?

NIMTF are pleased to see the inclusion of NI marine mammals from our member organisation, Irish Whale & Dolphin Group (IWDG) alongside the inclusion of other NI priority and protected species , in order to work towards improving the status of these species. To ensure this is the most appropriate data, we would recommend using data from the latest list of March 2023[19]. Additionally, we would propose the inclusion of UK Marine Mammals data to coincide with migration patterns across the Irish Sea. The addition of seabird data relating to migrations from Scotland would also be beneficial to consider migratory interactions with installations. It is important to include data relating to migrations of a variety of vulnerable, threatened and priority species - seabirds, marine mammals, elasmobranchs, etc - across the Irish Sea to Isle of Man, Scotland, Wales and England would be of use rather than just within Northern Irish waters.

Ecosystem services are benefits which are derived from the natural environment which contribute to health and wellbeing within communities[20]. NIMTF have highlighted that whilst this SEA Scoping Report does not take into account the natural capital of the marine environment, that it is something to consider assessing as we move forward to gain a better understanding of the importance of community interactions with their local seas. Data provided by the MANACA project[16] could provide some information in relation to the marine natural capital of blue carbon habitats - especially for seagrass.

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[20] https://www.nature.scot/scotlands-biodiversity/scottish-biodiversity-strategy-and-cop15/ecosystem-approach/ecosystem-services-natures-benefits#:~:text=Ecosystem%20Services%20are%20the%20direct,as%20reducing%20stress%20and%20anxiety.

[21] https://nimtf.files.wordpress.com/2023/08/oreap-sea-hra-process_constraints-response-nimtf.pdf

We are pleased to see the inclusion of seagrass data being used alongside saltmarsh data, especially as these form habitats and food items for numerous species including seabirds and are important blue carbon habitats. NIMTF would like to see the inclusion of these species and habitats data additionally present for the geographical range directly outside of marine protected areas (MPAs). Proposed protected sites, such as proposed Special Protected Areas (pSPAs) must be given the same consideration as fully designated sites within the SEA Scoping Report and thus must be treated with the same sensitivity as outlined within Appendix C. Achieving the above would enable the SEA Scoping Report to coincide with the upcoming Blue Carbon Action Plan and MPA Strategy Review.

Question 6: Can you propose any other data to be used in the SEA, and why it would be beneficial?

NIMTF wish to clarify the exact dates from the proposed data sources we had proposed within our previous response to the constraints data - UK Spawning and Nursery Grounds were not from 2010, but from an older source and the UK Marine Mammals data was from 2015, rather than 2019[21].

We are pleased to see that some of our previous suggestions have been incorporated into the data sources; such as the inclusion of the NI priority species both within the marine environment, but also terrestrial species; however we want to ensure that this is the most up to date list as this was updated in March 2023[19]. We are pleased to note that our member organisation, IWDG have been included and presumably approached for data they have relating to NI Marine Mammals as previously suggested. The inclusion of Scallop Enhancement Areas and Seagrass Beds is a welcome sight to the list of datasets, but would propose elevating these fully by 1 BRAG level to be on par with what is set for SACs and MCZs with identified habitats.

NIMTF are pleased to see that RAMSAR sites have been elevated fully by 1 BRAG level alongside UK Fish Nursery and Spawning Grounds, which have been fully elevated to 'Amber'. We welcome the inclusion of an overlapping dataset between Fish Spawning Grounds and Nursery Grounds being set at 'Red' level. These are all welcome inclusions to ensure that sustainable fish populations are maintained, or where there is unfavourable status, have the opportunities to be improved. Our partnership with Northern Ireland Fishermen's Federation (NIFF) and the current ongoing work around the Fisheries Management Plans (FMPs) aims to provide an additional layer of sustainability to that of the SEA objectives.

NIMTF are concerned that SACs and MCZs have been separated into mobile species and habitats, whereas it appears that SPAs have been combined and potentially downgraded - leaving it unclear as to whether this includes sensitive features such as a distinction between vulnerable migratory species, or over-wintering sanctuaries for declining bird populations. Clarification on whether or not some components of SPAs are being assessed through other data themes needs to be provided to make up for this distinction. In this scenario, NIMTF are in agreement with the request within RSPB's response that sensitivity for 'Cabling' within UK RSPB Reserves should be elevated to 'Amber', but extending to also include 'Fixed Wind' and 'Floating Wind'. NIMTF have previously requested that UK Important Bird Areas have an increased BRAG rating for 'Fixed Wind', 'Floating Wind', 'Wave' and 'Tidal' components. Due to the potential compartmentalisation of the SPAs section, and with negative changes provided to UK RSPB Reserves, NIMTF want the assurance that declining seabird populations are being given due consideration. We would request that all SACs, SPAs, MCZs and MPAs with "Restricted Areas" are increased by 1 full BRAG level due to the sensitive nature of the habitats and species contained within. In order to achieve ocean recovery in both a nature and climate crisis, we need to be prioritising designated sites to allow them to carry out their role of protection.

We would request that this also be extended to Harbour and Grey Seals due to their vulnerability to noise pollution - as frequently mentioned within Appendix D. NIMTF would wish to see this particular data set a high priority, or the inclusion of Acoustic Deterrent Devices (ADDs) to mitigate noise impacts for pinnipeds and cetaceans collectively.

One of our member organisations, Ulster Wildlife are doing key work in native oyster restoration[22] which will play into multiple upcoming pieces of legislation - completing the replication component of native oyster as recommended by the JNCC 2018 Report[23]; contributing to blue carbon habitats as part of the Blue Carbon Action Plan and providing additional ecosystem benefits such as improving water quality. Data for marine natural capital could come from the MANACA Report specifically for NI seagrass datasets. It is important to note them down not only as a potential partner, but also as a consultee moving forward if selected as an additional data provider.

Question 7: Do you agree with the approach to the assessment?

NIMTF are pleased to see that the SEA Scoping Report is intended to involve an iterative, developmental process, which will be incredibly beneficial when it comes to incorporating the upcoming legislation and policies such as Blue Carbon Action Plan, MPA Strategy Review, Seabird Conservation Strategy, Elasmobranch Strategy and the NI Marine Plan in its final form. It is important that the document remains 'live' to ensure that efficient adaptation to changes within our marine environment can be taken into account.

NIMTF do have concerns that the Departments are not fully cross-collaborating and taking a combined approach in relation to the development of an NI Marine Plan, which sits with DAERA. There is a missed opportunity to take a combined approach to marine planning for all marine users, not just for the Offshore Renewable Energy Industry; NIMTF hopes that this SEA Scoping Report contributes to the NI Marine Plan, proposing that it do so if this is not already being considered. Northern Ireland has been waiting on a national Marine Plan for over 10 years, with the last draft 5 years ago and developments are progressing across all industries. We need a Marine Plan in place to enable sustainable and appropriate site selection moving forward to safeguard the marine environment and enable Northern Ireland to lead the way.

NIMTF reiterates that the Precautionary Principle needs to be adhered to in areas we are data deficient until such data has been acquired. Long-term monitoring (Page 108) is a key component of the Mitigation Hierarchy and needs to be maintained throughout all processes for developments (Planning, Construction/Installation, Operation and Decommissioning[24]). Reducing fishing pressures cannot be classed in the same level as creating a protected area, especially as there are still cumulative impacts to be considered from offshore renewable infrastructure. Where data gaps have been identified in conjunction with eNGOs; such as with avoidance tactics for above and below-surface devices means that this cannot be applied across all contexts; such as different operating depths. There is potential funding available through the Offshore Wind Evidence and Change Programme (OWIC)[25] in order to meet these crucial gaps in scientific understanding that have been highlighted previously.

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[22] https://www.ulsterwildlife.org/news/new-glenarm-nursery-set-release-800-million-oyster-larvae-boost-biodiversity-and-clean-local

[23] https://data.jncc.gov.uk/data/39cde4b5-f14d-4cba-a569-9e024c933b0d/JNCC-DAERA-NIMPA-Network-Progress-v6.0-Web.pdf

[24] We acknowledge that OREF have indicated there will be a separate consultation on decommissioning before the end of 2023

In relation to the information contained within Appendix D, we would make the following additions and amendments:

- Scoping needs to be included for all levels of the developmental process, including 'Decommissioning[21]'.

- Benthic and intertidal ecology - needs to include a section about the impacts from cabling for all processes as the cable corridors will have impact based on placement, not just 'Operation'.

- Fish and Shellfish - Need to also include impacts from cable corridor placement within installation as Shellfish are more vulnerable to sudden change due to poor mobility in comparison to fish.

- Birds - We share concerns with our member organisation, RSPB over the use of artificial lights which can have a disorienting effect on seabirds[26] and the placement of renewables infrastructure in close proximity to key feeding grounds as this risks on the birds' food sources in addition to risking collisions as significant numbers of birds are attracted to the site.

- Marine Mammals - Underwater noise is a consistent, persistent factor across all processes. Through implementation of the mitigation hierarchy, future developers and planners need to ensure that ADDs are implemented across all infrastructure to ensure reduction in impacts to marine mammals.

In relation to the information contained within Appendix E; NIMTF welcome the further detail which will come from the Habitats Regulation Assessment (HRA) update for this section of the draft OREAP.

Question 8: Do you agree with the draft SEA objectives?

NIMTF have concerns over the limiting statement which is intended to apply across species, habitats and status where it states it does not aim to produce a negative **or a positive change** within designated areas (Page 105). NIMTF would like to see SMART (Specific, Measurable, Achievable, Relevant, Time-Bound) objectives featuring within the draft SEA objectives to measure success or failure of objectives against annual timescales leading up to 2030 and where possible, beyond. There needs to be clarification on the outcomes of not achieving these goals within the specific timeframes. It is important that developers and planners are actively promoting improvements to the marine environment through sustainable actions. We cannot tackle both the nature and climate crises in an isolated manner as the two are intrinsically linked; especially as this is echoed through the Global Biodiversity Framework[2]. Achieving this will require a Nature Positive Northern Ireland[27] and to Bring Nature Back[28].

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[25] https://www.thecrownestate.co.uk/en-gb/what-we-do/on-the-seabed/offshore-wind-evidence-and-change-programme/

[26] https://www.gov.scot/publications/review-inform-assessment-risk-collision-displacement-petrels-shearwaters-offshore-wind-developments-scotland/pages/5/

[27] See RSPB NI's Nature Positive NI campaign for further details.

[28] https://www.ulsterwildlife.org/sites/default/files/2022-04/Ulster%20Wildlife%20-%20Strategy%20to%202030%20-%20web_0.pdf

In order to achieve recovery within our marine environment, we need to ensure that we are following both the Precautionary Principle and the Mitigation Hierarchy. The Precautionary Principle applies here to ensure we do not bring about negative change where there is minimal data - further highlighted by the outweighing negative outcomes provided in Appendix D. The Mitigation Hierarchy ensures harm from developments is reduced as much as possible ; whilst ensuring that strategic compensation is only followed where any residual impacts that could not be avoided, minimised or mitigated against remain. It is important that the distinction is made between strategic compensation and other obligations held by the government regarding management of protected sites and marine resources in order to benefit nature, especially for recovery. This means it should not replace where there is a legal duty by the UK government or the NI Executive to carry out investment into the marine environment. Strategic compensation is a concept not fully developed, but it is hoped that government and stakeholders will work together to develop this shared approach with the right mix of innovation, monitoring and robust adaptive management to secure effective wins for nature at scale within our waters. Following these two frameworks will ensure that protected, sensitive and vulnerable species and habitats are able to survive and thrive through upcoming developments to tackle climate change.

Question 9: Do you agree with the proposed project timescales, and proposed consultees in the SEA process?

This particular timeframe for responses was particularly short and whilst we acknowledge that there will be a longer consultation period for collecting comments on the revised OREAP, we would request a greater window of response time to ensure that organisations have sufficient time to respond (especially NGOs with limited capacity) to ensure a meaningful, detailed response is able to be provided. We would welcome the opportunity to review in a timely manner to maximise available time for developing responses moving forward. We refer back to our previous response on the 'Process Flowchart' where the Department should consider holiday periods where there will be further limited capacity.

In the Consultees section (Page 110), National Trust and Ulster Wildlife have been mentioned and proposed respectively in relation to data providers. Their responses would be collated into future NIMTF responses as they are both member organisations. NIMTF wishes to remain a consultee representing a number of marine environmental NGOs alongside RSPB for future stakeholder engagements.

NIMTF are pleased to continue to be included within the development of the draft OREAP and wish to highlight the importance of including eNGOs as stakeholders for their knowledge in wider environmental impacts.

For further information, please contact the NIMTF Officer, Robert Walsh on robert.walsh@nimtf.org.