

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, Surfers Against Sewage 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 Position Statement on: [Newry, Mourne and Down District Council Biodiversity Strategy 2024-2030](#)

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NIMTF thanks Newry, Mourne and Down District Council (NMDDC) for the opportunity to respond to the Biodiversity Strategy 2024-2030. NMDDC declared a climate emergency in October 2019¹ and we are pleased to see the acknowledgement of the nature and climate crisis connection, with the council's report stating the climate emergency is "*affecting biodiversity at a faster rate than ever before.*"

This acknowledgement is vital as NMDDC has a direct responsibility to safeguard not only nature on land, but at sea. NMDDC incorporates a significant stretch of coastline (approximately 150km²) supporting a wide array of incredible marine species, including habitat vital for horse mussels and marine mammals³. NIMTF is pleased that the council has acknowledged that marine and coastal habitats are more vulnerable than others to the impacts of climate change. Our aim is to ensure that the marine environment has been adequately accounted for in any plans for biodiversity protection. As a coastal council it is vital to increase the level of marine focus in this Local Biodiversity Action Plan (LBAP). This will benefit not only nature, but coastal communities in the region, where the local economy can benefit from healthy seas as a result of marine restoration projects⁴ for saltmarsh, seagrass and tern islands which are susceptible to cumulative impacts from multiple pressures in our seas. These restoration projects bring the added benefit of natural coastal protection.

Under the Northern Ireland (Miscellaneous Provisions) Act 2006⁵, NMDDC is required in the exercise of its functions, to act in the manner it considers best to contribute to the achievement of sustainable development in Northern Ireland (NI)⁶. It is clear from the biodiversity strategy that the Council aims to contribute to sustainable development through the protection, maintenance, enhancement, restoration, and promotion of biodiversity. This must also consider marine and coastal environments.

NIMTF have within our marine vision⁷ to advocate and collaborate through partnership working to achieve a sustainable marine environment and a sustainable fishing industry. NIMTF partnered with Northern Ireland Fishermen's Federation (NIFF) to produce a joint response to the Joint Fisheries Statement⁸. Partnership and collaboration from the marine environment and the fishing industry is imperative in order to achieve sustainability for NI and across the Irish Sea; and NIMTF and NIFF continue to collaborate and work together on key topics relating to both sectors. The fishing industry within NMDDC will play a key role in achieving sustainable fisheries in line with ocean recovery.

1 <https://www.newrymournedown.org/climate-change>

2 <https://www.agendani.com/the-councils-vital-role-in-pioneering-sustainability-a-blueprint-for-a-greener-future/>

NIMTF are pleased to see the inclusion of a wide range of plans and programmes which have protection for nature at their core. The Biodiversity Plan contains links to international policies such as the Global Biodiversity Framework adopted at COP15⁹, with one of its goals stating ‘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 a signatory to the Global Biodiversity Framework. Within a time where we are failing to meet Good Environmental Status¹⁰ (GES) in our local waters, it is imperative that all biodiversity conservation strategies are developed with marine recovery in mind; especially as the NI Biodiversity Strategy 2015 - 2020 highlighted a failure to meet 83% of targets¹¹.

Meeting these targets is essential in tackling both the biodiversity and climate crisis, especially as many habitats and species are subject to cumulative pressures, resulting in further declines alongside a drastically changing climate. Local legislation is also included in the LBAP, which is more specific to NI and encompassing the NMDDC area, e.g. the Climate Change Act (Northern Ireland) 2022¹² and Living Well Together – A community plan for Newry, Mourne and Down to 2030¹³. NIMTF welcomes the inclusion of marine environmental policies – the Strangford Lough and Lecale AONB Management Plan and Marine Protected Area Management Plans for Carlingford, Murlough and Strangford Loughs. However, a well-meaning plan falls short if there are not actions capable of implementing in order to achieve the goals and objectives. NIMTF would advocate the implementation of specific, measurable, achievable, relevant and time bound (SMART) objectives to ensure that these ambitious goals are able to be achieved within a timely manner and with proper resources allocated to overcome challenges and barriers associated. NIMTF understands that in NMDDC’s Community Plan to 2030¹³ that the following principles and outcomes coincide with NIMTF’s marine vision for the marine environment:

Principles

- Utilise the strengths and resilience within communities
- Adopt a preventative approach
- Support a sustainable approach to development
- Hold each other as partners to account for delivering the Community Plan outcomes in collaboration
- Create a Partnership Board responsible for monitoring and direct impact

Outcomes

- All people in Newry, Mourne and Down benefit from prosperous communities
- All people in Newry, Mourne and Down benefit from a clean, quality and sustainable environment
- All people in Newry, Mourne and Down live in respectful, safe and vibrant communities

We recognise that the lack of a published Marine Plan¹⁴ for NI makes it difficult to enact marine recovery strategies amongst growing marine industries, however, we suggest that NMDDC consult existing marine plans elsewhere, such as the National Marine Planning Framework in the Republic of Ireland¹⁵, which may give some insight into strategies being used, which similar versions of could be useful in NI. This should be done in conjunction with DAERA's Marine Map Viewer until the Marine Plan has been finalised. Links to upcoming strategies which are in development need to be accounted for; whilst ensuring we are holding space to build capacity for policies still to be implemented such as a Blue Carbon Action Plan, MPA Strategy Review, Seabird Conservation Strategy and an Elasmobranch Strategy.

The strategy lists the greatest threats to biodiversity as habitat loss and fragmentation, pollution, climate change, and invasive, invasive non-native species (INNS). The Council highlights several terrestrial invasive species as threats, such as Japanese Knotweed and Grey Squirrel. However, NIMTF would recommend that they have noted that marine-based INNS have been omitted from this plan. For example, there are at least nine INNS known to exist in the Sketrick Narrows area of Strangford Lough alone, including the algae, Japanese Wireweed (*Sargassum muticum*) and the tunicates (*Aplidium glabrum*)¹⁶. We would advocate for a marine-specific INNS management and mitigation plan to be included in any future policies relating to invasive species; with an example of eNGO INNS management being Rathlin LIFE Raft¹⁷ to ensure that seabird species have a chance to recover. This could feature within the marine section, or an addition to the INNS section highlighted within the strategy.

Additionally, work being done in Strangford through both WWT Castle Espie and National Trust NI is ensuring that saltmarsh^{18, 19} recovery is being achieved which will support greater food webs and marine biodiversity. The collective goal of improving biodiversity can also be achieved by having a presence on relevant forums which NIMTF sit on, e.g. Strangford Lough Management Plan. Ensuring that attendance from NMDDC on groups for Carlingford and Murlough Management Plans would be beneficial in achieving improvements to marine biodiversity.

NIMTF welcomes plans included to raise public awareness and education around biodiversity, specifically WiSe training²⁰ for relevant stakeholders. Additionally, we encourage that WiSe training is conducted on an increased scope across NMDDC, rather than limiting it to just the Strangford and Lecale AONB. Furthermore, we recommend that NMDDC review ways to engage the public in the marine environment in a sustainable manner; as even small interactions with marine animals, such as the presence of dolphins within Strangford Lough throughout the summer of 2023 has proven to draw crowds²¹. Public interest in marine attractions in Newry, Mourne and Down could be further expanded through activities such as eggcase hunts at Cranfield beach during NMDDC's World Ocean Day Celebration event²², as well as participation in wider citizen science projects where they can contribute to long-term biodiversity objectives and become upskilled in the process. Within Strangford and more widely conflict arises being the commercial collection of intertidal shellfish species for human consumption. This is an unregulated activity and has an impact on biodiversity through physical disturbance and removal of key species from these habitats. The impact of this must be addressed and actions put in place to prevent the negative impact.

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

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

12 <https://www.legislation.gov.uk/nia/2022/31/contents/enacted?view=plain>

13 https://www.newrymournedown.org/media/uploads/community_plan_livingwelltogether_apr_17.pdf

A UNESCO Global Geopark (UGG)^{23, 24} has been established within NMDDC encompassing Murlough Bay MPA, Strangford Lough MPA and Carlingford Lough MPA. It is hoped that this UGG will attract tourism to this region through activities such as kayaking, sailing, and wildlife spotting²⁵, which will in turn bring economic benefits to the area, and contribute to NMDDC's predicted overnight stay tourism revenue of £107,520,000 by 2028²⁵. Despite its economic benefits, an increase in tourism will likely bring a variety of challenges to coastal and benthic marine environments, such as increased pollution and erosion as a result of human activity²⁶. Therefore, it is of the utmost importance that tourism needs to be sustainable, with a marine recovery focus if it is to be inclusive of the marine environment. This could be done through efforts to enhance blue carbon habitats. These are habitats and species that contribute to carbon sequestration, the removal of carbon dioxide from the ocean, as this is a carbon sink from the atmosphere. Habitats and species that can deliver this include kelp, seagrass²⁷, saltmarsh²⁸ and native oyster reefs²⁹; the latter of which can help to complete NI's MPA Network. This Strategy provides a perfect opportunity for the Council to potentially support the work of coastal habitat restoration; especially through involvement in funded projects such as Peace Plus.

NIMTF acknowledges long-term monitoring and reporting strategies to review available resources and progression of native tree planting in the LBAP laid out. However, we recommend that annual performance outcome reports be expanded to include some marine reporting, such as carrying out species diversity analyses. It is important to capture the land-sea connectivity as impacts on land from agriculture and waste will have impacts upon the marine environment that need to be reviewed and addressed to achieve ocean recovery and contribute to achieving robust, strong biodiversity levels for the Newry, Mourne and Down region.

Coinciding with the previous statement around long-term monitoring and achievable goals, it is important to ensure that any measures implemented which will benefit biodiversity both terrestrial and marine have SMART objectives attached. Currently the overall strategy does not outline time-bound measures, or a review period and with changes happening within biodiversity through the State of Nature Report, we must ensure that we have the capacity to monitor effectiveness of this biodiversity strategy as we progress. In doing so, we can realign if actions taken are not having the desired effect to ensure that we are keeping up with a changing climate.

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<https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Marine%20Plan%20for%20NI%20final%2016%2004%2018.PDF>

15 <https://www.gov.ie/pdf/?file=https://assets.gov.ie/139100/f0984c45-5d63-4378-ab65-d7e8c3c34016.pdf#page=null>

16 <https://invasivespeciesireland.com/wp-content/uploads/2013/03/Julia-Nunn.pdf>

17 <https://rathlin360.com/life-raft/life-raft-objectives/>

18 <https://www.wwt.org.uk/news-and-stories/news/wwt-awarded-21-million-to-restore-coastal-saltmarsh-in-uk/>

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<https://www.nationaltrust.org.uk/visit/northern-ireland/mount-stewart/responding-to-climate-change-at-mount-stewart>

20 <https://www.wisescheme.org/>

21 <https://www.itv.com/news/utv/2023-06-09/two-dolphins-make-lough-home-hundreds-of-miles-off-scottish-coast>

22 <https://liveherelovehere.etinu.net/liveherelovehere/documents/007648.pdf>

23 <https://www.unesco.org/en/igpp/geoparks/mourne-gullion-strangford>

24 <https://mournegullionstrangfordgeopark.com/visit-mourne-gullion-strangford/>

25 https://cdn.ringofgullion.org/sites/4/2023/11/Tourism_Strategy_2023_-_2028.pdf

26 <https://www.unep.org/news-and-stories/story/how-can-tourism-fix-its-plastic-problem>

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

28 <https://www.wwt.org.uk/uploads/documents/2023-01-30/wwt-blue-carbon-route-map-2023.pdf>

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

Overall, NIMTF welcomes the opportunity to further engage with NMDDC as we move forward in ensuring that the marine environment is a sustainable source of education, recreation but most importantly, able to self-sustain the highly unique, diverse and important species and habitats which puts NI on the map. Newry, Mourne and Down is infamous for the coastline and it is important to highlight not only what people are able to see from land, but what treasures may be hidden beneath the waves of equal importance to biodiversity; whilst achieving the goals of NMDDC's Community Plan.

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