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 response to: Public Consultation on Trawling Activity Inside the Six Nautical Mile and Baselines (Republic of Ireland)

11th April 2024

NIMTF thanks the Department of Agriculture, Food and Marine (DAFM) for the opportunity to respond to this consultation on trawling activity within the six nautical mile and baseline for the Republic of Ireland (RoI).

Irish waters are home to an array of incredible marine species, from fascinating benthic species such as sea pens, rich habitats such as seagrass which act as nursery sites for several fish species and magnificent basking sharks which migrate northwards along Irish coasts in the warmer months. However transformative changes are now required to protect and restore Irish nature, including within the marine environment which has been experiencing devasting declines in recent decades.

The Common Fisheries Policy, adopted by RoI to provide a framework for fisheries management, sets out the need to *'Protect and restore marine ecosystems for sustainable and resilient fisheries to achieve a more consistent implementation of the EU's environmental policy and the common fisheries policy'.* Fishing pressures associated with trawling activity are known to result in the greatest damage to components of healthy, thriving marine ecosystem.

To ensure steps are taken that will protect and revive a healthy and thriving marine environment in Irish seas, NIMTF would advocate for option 3 '*All sea-fishing boats over 18m in length overall excluded from trawling inside the six nautical mile zone and baselines*' as soon as is feasible at a national level. In line with eNGO coalition Fair Seas position, we believe this fisheries management option gives the greatest environmental and conservation benefit while also preserving and potentially increasing the social, economic and cultural positives of the inshore fishing sector and coastal communities in Ireland.

Impacts

Benthic disturbance

Bottom trawling is commonly recognised as the most frequent and widespread cause of anthropogenic disturbance and pressure on the seabed[1]. Bottom trawling activities involve weighted nets and trawl doors being dragged along the seafloor, leading to benthic species and habitats, such as seagrass meadows, being disturbed or destroyed. DAERA's 2020 assessment on commercial fisheries[2] within Marine Conservation Zones (MCZs) indicated that bottom trawling can have long-

term devastating impacts on benthic communities[3] reducing the ability of these fragile species to recover.

The Irish Sea is currently one of the most intensively trawled areas within European waters, with much of the area trawled repeatedly several times per year. Within the western Irish Sea, it has been estimated that between 20 and 50cm of mud has been removed from the seabed over a period of 20 years because of bottom-trawling[4]. These habitats support vulnerable and specialised marine species. If this activity is occurring on a regular and unregulated basis, these fragile habitats will not have the ability to recover at a sustainable rate, highlighting the need for urgent management.

Additionally, trawling may have adverse effects on carbon storage and sequestration within the benthic environment. During bottom trawling, the resuspension of seabed sediments occurs. This potentially results in the exposure of buried organic carbon to oxygen-rich overlying waters, enhancing organic matter remineralisation processes and reducing the quantity of organic carbon stored. Given the climate crisis we're currently experiencing, protecting the resilience and functioning of natural carbon stores and processes in our seas must be a priority. As seagrass meadows, mud-rich habitats and a wider suite of blue carbon ecosystems are highly vulnerable to human activities that abrade, remove, or smother such ecosystems, such as bottom trawling, we fully support the prohibition of demersal mobile gear in the inshore region to protect these vital sites.

Bycatch

In the Irish Sea region, there are several commercially exploited stocks which are assessed (by the International Council for Exploration of the Seas) to have biomass below a sustainable limit. For example, Whiting[5] populations in the Irish Sea have been depleted for many years to unsustainable levels. Whiting remains susceptible to significant bycatch in demersal trawl fisheries. Without significant improvements in gear selectivity, it is likely these issues will persist, and bycatch of whiting will continue to occur at unviable levels for species recovery.

In addition to fish species, the concern over bycatch within trawling activity is of major concern for species such as cetaceans, seabirds and elasmobranchs. Pair trawls are a high-risk gear for mobile species bycatch, with examples for the Bay of Biscay highlighting bottom and mid-water pair trawls being associated with high levels of common dolphin bycatch[6]. Reducing the scope of trawling within 6 nautical miles would be a significant step to reduce the probability of bycatch for cetaceans, seabirds and elasmobranchs in coastal Irish waters, in areas they're dependent on for feeding, breeding, and nursery grounds.

Management efforts for migratory species in ROI and NI waters impacts species ability to thrive throughout the waters around the island of Ireland. Without aligning targets for species protection and recovery in Northern and Southern waters, it is futile to expect conservation objectives set for marine biodiversity to be fully met. With new fisheries management measures restricting bottom-trawling activity in the majority of NI's inshore region being implemented in 2023, there is a real opportunity to co-ordinate objectives, targets and actions for marine biodiversity throughout Irish waters.

Unsustainable fishing levels

NIMTF echo the point made by our coalition partners the Irish Whale and Dolphin Group (IWDG) that '*The unregulated fishing of ecologically vital forage fish such as sprat, pilchard, anchovy and sandeel has caused a critical removal of biomass from the inshore areas around Ireland. These forage*

fish provide a fundamentally important trophic link between zooplankton and whales, dolphins, porpoises, seabirds and predatory fish. These forage fish populations are dynamic, fast-growing, and vulnerable both to overfishing and shifting temperatures caused by climate change'. Prohibiting sea-fishing boats over 18m in length from performing trawling activities within the 6nm limit would in Fair Seas view deliver the maximum conservation benefit by reducing fishing pressure in the area, while also preserving and re-prioritising opportunities for the smaller inshore fleet.

Experience in Northern Ireland

Through effective management of bottom trawling activities, pressures created by trawling can be alleviated. In Northern Ireland, NIMTF welcomed new byelaws introduced in January of 2023, restricting bottom-trawling, and introducing management measures in 9 MPAs in NI.

Success in this area was achieved by engaging early and frequently with relevant stakeholders. NIMTF worked in coalition with the Northern Ireland Fishermen's Federation (NIFF) and the Department of Agriculture, Environment and Rural Affairs (DAERA) to achieve the establishment of the partnership 'Co-Fish'[7] (Fisheries and Conservation Partnership). Through Co-Fish the new byelaws in MPAs have been cemented, communicated, and monitored. This has shown the value of collaboration between eNGO and fisheries when introducing measures to achieve sustainability for both industry and the marine environment. We would emphasise the importance of all relevant stakeholders being engaged early in the process.

Additionally, we also welcomed the use of adaptive management being applied to these new measures as a tool for monitoring effectiveness and reacting accordingly to adapt these new measures if needed.

However, thus far there have been challenges in monitoring the effectiveness and compliance of this new legislation. When implementing fisheries management measures in RoI, we would recommend appropriate monitoring is in place. For example, for reliable data collection vessels for which this legislation applies must be equipped with Inshore Vessel Monitoring Systems (I-VMS). I-VMS is not mandatory for under 12 metre vessels in Northern Ireland. This has contributed to challenges in building data on vessel location and usage of NI inshore and waters in the MPA network. It is also key that once installed I-VMS be operational at all times when a vessel is commercially fishing.

Inshore I-VMS will represent a positive step in improving the level of monitoring and surveillance of the inshore fleet activities; however, it does not provide the most accurate information available on the level (i.e. effort) of fishing activity. Location alone, without an understanding of the level/type of activity during I-VMS activation, represents a poor proxy for fishing effort overall. Therefore, we suggest that further additional measures be considered to represent the 'volume and value of fishing activity' better. These may include considering a catch reporting mechanism, and the exploration of introducing Remote Electronic Monitoring (REM) with cameras to RoI vessels.

To ensure any applied measures are truly impactful and reap benefits for the marine environment it is key that a baseline of marine and benthic habitat condition is available prior to application. This will allow for the effectiveness of measures that have been implemented to be truly understood. This then provides an opportunity to demonstrate successful management options to the fishing industry to achieve and garner support for sustainable fishing practices.

It is very important that we ensure there are enforcement measures to coincide with the application of any fisheries management measures. Management measures will only be as effective as the level

of enforcement that can ensure they're properly adhered to. To achieve this, enforcement needs to be well funded alongside monitoring and management actions.

As previously highlighted with Co-Fish, collaboration with industry was key to bringing forth impactful change. In NI, this has proven incredibly beneficial in working towards sustainable objectives within the marine environment.

The need to act urgently.

The Irish Government has committed to achieving 30% MPA coverage of Ireland's Maritime Area by 2030[8] to meet national and international commitments[9]. With 6 years to meet this target, currently in the RoI MPA coverage equates to 2.33% of the marine area; with only 0.02% having effective management[10]. For example, a directive report from Irish Government to the European Commission[11] investigated case studies for several MPAs including Roaringwater Bay, Blacksod Bay, Kenmare Bay and Lough Swilly. Assessments highlighted a failure in mitigating impacts from a range of activities such as fishing due to a lack of management and enforcement. With this lack of designation there is an urgent need to act and implement management measures which will protect Irish marine species and habitats in RoI inshore waters. Restrictions on trawling in the inshore region would contribute greatly to this.

Overall, there is vast potential for RoI to be ambitious with the action carried forward from this consultation on bottom and paired trawling. A healthy marine environment, supported by well-managed fisheries measures, underpins a sustainable fishing industry. Using the above lessons learned from NI, the RoI can ensure the long-term recovery of the marine environment not only for species and habitats, but all coastal and marine users.

For further information please see responses by Fair Seas and Irish Wildlife Trust.

For further information on anything within this response, please contact Robert Walsh, Northern Ireland Marine Task Force Officer on robert.walsh@nimtf.org.

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