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, Marine Conservation Society, Keep Northern Ireland Beautiful, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust 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: Engagement on Strategic Environmental Assessment (SEA) for Offshore Renewable Energy Forum (OREF) (Department for Economy)
Submitted: 26th April 2024

NIMTF thanks the Department for Economy (DfE) for the opportunity to respond to the potential resource zones provided to us. NIMTF wish to reiterate considerations and recommendations for the SEA:

Marine Protected Area (MPA) Condition Assessments

NI's MPA features are not all in Favourable condition, with additional work needed regarding the implementation of robust, actionable MPA management plans to ensure these designations and MPA objectives are effective in achieving ocean recovery.

To meet recommendations from the 2018 JNCC report to achieve ecological coherence of NI's MPA Network, we must ensure a "best approach" to sustainable development is taken, especially in the absence of a Marine Plan for NI. Alongside the MPA Condition Assessments, there are 11 out of 15 indicators that are failing to meet Good Environmental Status (GES) for the UK as a whole, including benthic habitats, birds and fish.To support natures recovery, unsustainable levels of activities and development impacting on our seas cannot be allowed within our MPA network, ensuring all marine wildlife and natural ecosystems can survive and thrive in Northern Irish waters. . It is important to consider that both the climate and nature crises we face are entwined and one cannot be resolved without also tackling the other. To do so, we must ensure that our MPA designations are able to support marine biodiversity and are allowed to recover the species and habitats within.

Data Deficiencies and the Precautionary Principle

In NI, we have minimal data relating to species interactions with offshore renewable infrastructure. To meet requirements of the Climate Change (Northern Ireland) Act 2022 and the Energy Strategy 2021 it will be necessary to have some degree of renewable infrastructure within our marine environment. However, to ensure the protection of species and habitats, the Precautionary Principle must be applied where there is a lack of evidence on the impacts of any element of the development, whereby in the absence of scientific certainty, development should not go ahead. Being data limited in an area does not mean that there is no risk of impact and using extrapolated comparisons to similar species and habitats which are in different geographical regions is a poor

substitute for robust data needed to be collected. To ensure sustainable developments moving forward, we need to incorporate vital strategic spatial planning to direct offshore renewable energy proposals to the least ecologically sensitive areas, enabling the spatial strategic planning process to be more nature-positive. In addition, through the implementation of the Mitigation Hierarchy, we can ensure that in the first instance, any impacts must be avoided, where this is not possible then the impacts must be minimised. Only where this is not possible then sufficient mitigation measures must be put in place. Offshore renewable energy development must act as a catalyst for ocean recovery through nature-positive actions - as highlighted within RSPB's Powering Healthy Seas Report 2022.

Through consenting regimes, effective long-term monitoring programmes must be robustly enforced via conditions. Furthermore, data gaps must be eliminated. NIMTF will continue to advocate for long-term data monitoring and decision-making which is in collaboration with nature to ensure recovery; providing a clearer, holistic picture of our marine environment in relation to sustainable developments at sea.

Spatial Aspect of Resource Zones

NIMTF wishes to state that we will not be submitting an annotated map due to current data gaps, and the Precautionary Principle must be applied until we have a greater understanding of the overall impact of offshore renewable energy developments on the marine environment. It is also important to address the BRAG ratings that NIMTF and RSPB have provided comment on previously within both our August and October 2023 responses. Recommendations by both organisations were not fully considered and in order to achieve renewables in harmony with marine biodiversity, the Offshore Renewable Energy Action Plan (OREAP) must be underpinned by BRAG ratings that fully consider the potential impacts to marine species and habitats.

The dynamic nature of the marine environment limits the ability to decisively draw lines on the provided map document; for example, the dynamic and shifting nature of the marine environment in relation to climate change and increasing storm surges. These storm surges are increasing in force and are causing shifts and changes within our marine environments - affecting coastal habitats which could affect the ability for land-sea connectivity in relation to cable corridors. Therefore, the limiting nature due to unpredictability of the dynamic marine environment must be considered, especially in the present absence of a finalised NI Marine Plan. Furthermore, NIMTF wishes to emphasise that lack of comment on specific sites should not be taken as an approval to place offshore renewable infrastructure inappropriately within these areas of the marine environment either. Any development must be underpinned by robust and competent environmental assessment, including Habitat Regulations Assessment and the application of the mitigation hierarchy and the precautionary principle, to ensure that marine biodiversity and habitats are not subject to negative impacts from offshore renewable installations.

Land-Sea Cable Corridor Connectivity

NIMTF appreciates that planning with lines on a map can become additionally challenging when there are specific connection points which must be made. This is a contributing limiting factor in relation to appropriate siting of offshore infrastructure. The siting of associated cabling needs to be developed in harmony with marine biodiversity, through the Mitigation Hierarchy to ensure impacts are avoided, and where this is not possible, impacts are minimised. Only where this is not possible then sufficient mitigation measures must be in place.

It is important that consenting regimes for future offshore renewable energy developments will consider marine species and habitats. We must tackle the twin nature and climate crisis in tandem, as opposed to addressing one by potentially exacerbating the other. For further information on recommendations NIMTF have made in our previous responses, please see the following:

NIMTF Response to SEA Scoping Report (October 2023):
https://nimtf.files.wordpress.com/2023/10/sea-scoping-report-nimtf-response.pdf

NIMTF Response to SEA and Habitat Regulations Assessment (HRA) Process Flowchart and Constraints Data (August 2023):
https://nimtf.files.wordpress.com/2023/08/oreap-sea-hra-process_constraints-response-nimtf.pdf

RSPB NI's Response to this round of consultation.

NIMTF welcomes further engagement with DfE on OREAP and the subsequent processes as it develops.

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