The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, National Trust, Friends of the Earth, Marine Conservation Society, Keep Northern Ireland Beautiful, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust, Causeway Coast & Glens Heritage 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: UK Marine Strategy Part One (DEFRA)
Submitted: 15th August 2025

1a) To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of the **state of UK seas**. What else, if anything, would be valid to include?

NIMTF found that the information contained within the updated assessments do somewhat reflect the picture that we are seeing, particularly within NI seas. The sources indicate that the state of our seas is concerning, facing numerous significant threats and largely failing to meet established environmental targets. There is a clear consensus that urgent, transformative action is needed to reverse declines and restore marine health[1,2]. Below we highlight further information on our understanding of the current state of our seas and the role that NI plays in contributing to the overall UK state of the seas:

Marine Protected Area (MPA) Network

NIMTF disagrees with the statement of "We have now completed our 'ecologically coherent network' of MPAs." There are multiple components which lead to an 'ecologically coherent network' which is complete; a) designation, b) management measures and plans and c) favourable/unfavourable recovering conditions. All three must be applied to ensure that these can be classed as complete. The JNCC analysis carried out in 2018 shows that there were identified gaps which still remain to this day in NI - namely with native oyster (*Ostrea edulis*)[3]. Work is underway, but NIMTF cannot agree with the UK government when they say that the MPA network is 'complete', especially not with the lack of designation and management for native oysters after 7 years of this issue being identified.

Whilst NIMTF appreciates that DAERA have highlighted in their 2024 Environmental Statistics Report that 87% of marine habitat features and 71% of marine mammal features were in favourable status[4], the 2025 Environmental Statistics Report does not provide the same level of explicit statistics for the marine, instead quoting that "54% of features within Marine and Terrestrial protected sites were in Favourable condition while 38% per cent were in Unfavourable condition."[5] The calculations here in the space of a year do not fully add up to make sense unless there has been a degradation in either marine or terrestrial, however this does not explain what the split is. NIMTF therefore would query

how close we are within our MPA Network to achieving favourable status for our NI MPA Network. Within our response to the MPA Strategy Review consultation[6], we highlighted a table of missed deadlines from the MPA Strategy 2014[7], which we highlight below with updates since we submitted the response:

Table 1. Timeframes of objectives from the MPA Strategy (2014) and the current progress of those objectives.

Timeframes	Adjustments
2015: Substantively complete designation of Northern Ireland's marine Special Protection Areas (SPAs) - informed by UK Marine SPA Programme	Proposed SPA for East Coast and Carlingford Lough not designated[8,9]. NIMTF have been informed that this is sitting with the DAERA legal team at both December 2024 and July 2025 meetings (DAERA, *pers. corres.*)
2015: Public consultation on draft Marine Plan for Northern Ireland.	A Marine Plan public consultation was launched in 2018 but the strategy has yet to be published[10]. Originally NIMTF was informed by the end of 2024 as an expected date (DAERA, *pers. corres.*) but have since been informed to expect it in Autumn 2025 (DAERA, *pers. corres.*)
2016: All MCZs formally designated.	Still gaps in terms of representation and replication as identified through the JNCC 2018 Analysis[3].
2016: Establishment of a well-managed network of MPAs	MPAs are still lacking SMART, actionable management plans. Conservation Management Plans (CMPs) are not expected to be published by DAERA until 2028[11].
2020: Aichi Targets[12] - Contribute to the delivery of actions that effectively reduce the rate of, halt and reverse the loss of biodiversity.	We have not met the overall target for 2020 of contributing to the Aichi Targets[12], as illustrated by statistics from State of Nature Report (2023)[13] and Seabird Count (2023)[14]. In 2022, the Aichi Targets were replaced with the Global Biodiversity Framework (GBF)[15] and detailed targets until 2030. It will be imperative that we strongly meet the objectives outlined within this new framework.

Biodiversity Loss in Northern Ireland

In Northern Ireland, we are tackling a joint climate and biodiversity crises which has been exacerbated by the following points:

◦ **None of Northern Ireland's coastal waters are currently achieving GES** due to persistent pressures.

◦ Based on 2014-2019 condition assessments for Northern Ireland's Marine Protected Area (MPA) features, **36% are in "Unfavourable" condition**, 3% are "Unfavourable Recovering", 5% are of "Unknown" condition, and less than 1% have been destroyed[11]. This was referenced within a 2025 report from the Office for Environmental Protection (OEP)[2], carried out by Howell Marine Consulting

assessing and evaluating the current progress and status of both England and Northern Ireland's MPA Network.

• **Significant Biodiversity Loss:**

◦ Northern Ireland ranks **12th worst out of 240 regions globally for biodiversity loss**, with over half of its biodiversity found in its seas[16].

◦ Globally, the abundance of oceanic sharks and rays has **declined by 71% since 1970**[17]. A third of all sharks, rays, and chimaeras are now threatened with extinction. Given that oceanic sharks and rays contribute to the 'Fish' indicator, this needs to be reversed, especially through NI's draft Elasmobranch Conservation Strategy[18], which NIMTF responded to[19].

◦ At least **44% of the UK's seagrasses have been lost since 1936**[20]. More recent data indicates losses of 92% for seagrass meadows, 86% for saltmarsh, and 95% for oyster reefs[21].

◦ The latest JNCC Seabird Count (2023) shows **significant declines in nearly 60% of breeding seabird populations in the UK**, with specific declines in Northern Ireland including **Atlantic Puffin by 70% and Roseate Tern by 75%**[14].

Climate Change:

◦ Climate change is a **significant threat**, having profound effects on marine ecosystems at global and local scales.

◦ Observed impacts include: **range shifts of many marine species** to more northern latitudes and higher altitudes, **population explosions and crashes**, **changes in ocean chemistry affecting calcifying organisms** like shellfish, **increased severe weather events** leading to run-off, flooding, and drought, and **changes in the timing of natural events** such as bird migrations. The UK Climate Change Committee (UK CCC) has said that the UK is not prepared for the long-term impacts of climate change[22].

◦ Impacts from climate change mitigation measures, such as **offshore wind farms**, can also affect important marine life sites. It is important that both the Precautionary Principle[23] and the Mitigation Hierarchy are followed as we develop offshore renewable energy technology. For further information, please see NIMTF member RSPB's Powering Healthy Seas Report (2022)[24].

◦ The **degradation of crucial blue carbon habitats** like seagrass and saltmarsh releases greenhouse gases, reducing the ocean's carbon sequestration potential[25]. These need to be reversed in order to allow blue carbon habitats to provide their unique ecosystem functions and services. In NI, this can be preserved through effective implementation of the actions within the Blue Carbon Action Plan 2025 - 2030 (BCAP)[26].

◦ **Rising sea levels** are expected to cause significant loss of coastal wetlands and impact intertidal habitats[27].

◦ **Record sea temperatures** are adding pressure to fragile marine populations, leading to species distribution shifts and increased mortality for some seabirds[28,29]. Ocean acidification creates challenges for species with calcium carbonate shells.

Widespread Pollution:

◦ **Marine Litter and Plastic Pollution:** Millions of tonnes of litter, primarily plastic, enter the ocean annually, causing **ingestion, suffocation, and entanglement for hundreds of marine species**. In Northern Ireland, 90% of marine litter on beaches in 2022 was plastic, leading to **579 recorded cases of animals impacted by plastic pollution**[30]. Wet wipes, often mislabelled as "flushable," are a

significant source of microplastics and contribute to drainage blockages and flooding. This led to a UK-wide

◦ **Water Quality:** In 2021, **no river, lake, transitional, or coastal water bodies in Northern Ireland achieved "good overall status"**[31]. **Two-thirds (66%) of Shellfish Water Protected Areas failed** to meet guideline standards in 2020. Recent toxic algal blooms in Lough Neagh have been catastrophic, with pollutants impacting marine environments like the North Antrim coastline[32,33]. Inadequate wastewater treatment and combined sewer overflows lead to widespread contamination, with **80% of 270 storm overflows discharging into Belfast Lough found to be "unsatisfactory"**[34].

◦ **Noise Pollution:** Anthropogenic noise from marine activities, such as anchoring and piling, poses a significant risk to marine animals, especially cetaceans, leading to disturbance and disorientation[35]. There is a lack of mechanisms to collate future noise impacts or understand ambient noise levels.

• **Unsustainable Resource Use and Development:**

◦ **Unsustainable Fishing Practices:** Fisheries are the **most widespread pressure** on the marine environment. This includes **habitat loss and disturbance** from gear like bottom trawling and scallop dredging, **overfishing** (e.g., cod and whiting stocks in the Irish Sea are below sustainable levels), and **bycatch** of non-target species like cetaceans, seabirds, and vulnerable elasmobranchs.

◦ **Aquaculture Expansion:** The industry's expansion in Northern Ireland often overlaps with or is near MPAs, as highlighted in our response to Mill Bay proposals, raising concerns about habitat disturbance and the need for rigorous regulation of activities like unlicensed oyster trestles[36].

◦ **Offshore Development:** The limited marine area in Northern Ireland faces increasing spatial competition. While renewable energy development is supported, it must not worsen the nature crisis. Concerns include collision risk, barrier effects, displacement for mobile species, and potential impacts from **electromagnetic fields (EMF) on elasmobranchs**. Cable laying and anchor placement can also damage sensitive benthic habitats.

• **Governance Failures:**

◦ Northern Ireland has **fallen behind the rest of the UK in meeting statutory environmental requirements**. This includes the **absence of a finalised marine plan** (in draft since 2018[10]) and **lack of an independent Environmental Protection Agency (EPA)**[37].

◦ This has led to **substantial degradation of the marine environment** due to inadequate policy, enforcement, and historical underinvestment.

◦ Key marine strategies, such as the MPA Strategy Review[38], Seabird Conservation Strategy and Action Plan[39], and Elasmobranch Conservation Strategy[18], are still in development or awaiting implementation.

◦ A "silo mentality" within government departments, where environmental responsibility largely falls to DAERA, hinders integrated approaches to marine management.

In summary, the sources paint a picture of Northern Ireland's seas being under severe cumulative pressure from pollution, unsustainable human activities, and the overarching impacts of climate change, exacerbated by historical governance shortcomings and a lack of coherent, enforced environmental planning.

1b) To what extent, if at all, does the information presented in these updated assessments provide an accurate reflection of **progress toward Good Environmental Status**. What else, if anything, would be valid to include?

The progress towards **Good Environmental Status (GES)** in our seas is largely **unsatisfactory and concerning**. GES is defined as the environmental status of marine waters where they are **"clean, healthy, safe, productive and biologically diverse"**, with ecosystems functioning properly and being resilient to human-induced change, preventing biodiversity decline, and avoiding pollution effects.

Northern Ireland's Progress towards Good Environmental Status

Based on the Descriptors - Table 1 highlights the component and the status.

Seals and Cetaceans

- Harbour seals (declining) - partially met, but data availability limits the capacity to assess. Grey seals are good. (D1, D4)
- Cetaceans (declining - mainly through bycatch) (D1, D4)

Seabirds

- Seabirds - non-breeding marine bird abundance between regions declines. Shows issues with connectivity and coherence between transboundary SPAs; foraging and breeding grounds. Good steps in the right direction for removal of INNS from colonies, such as the implementation of RSPB's LifeRAFT project[40].
- For **marine birds**, the Northern Ireland Seabird Report 2019 report highlighted that 35% were in unfavourable conditions and 8% were not assessed in the UK MPA network[41]. The UK Marine Strategy review indicates seabirds are continuing to not meet good environmental status.

Benthic Habitats

- Still not achieving GES, despite forming the basis of many marine food webs. Protections here need to be improved and pressures reduced to make a meaningful contribution.

Pelagic Habitats

- The true target is uncertain/partially met due to lack of a suitable model for assessing GES, with current low confidence in the results.

Pollution and Contaminants

- Pollution - trending away from GES
- Contaminants (overall not met for the whole UK) - persistent pollutants causing the problem here.

- Contaminants in seafood - no assessment could be carried out, therefore cannot say that this has been met. (D9)
- Mercury - threshold raised to reflect the issues at sea. Ensures alignment with the European Commission and other international treaties. Work being done through OSPAR to assess emerging chemicals
- **Water quality** targets are consistently missed; in 2021, **no river, lake, transitional, or coastal water bodies in Northern Ireland achieved "good overall status"** under the UK Water Framework Directive[31]. Additionally, in 2020, **two-thirds (66%) of Shellfish Water Protected Areas failed** to meet guideline standards. Water pollution sources in Northern Ireland, as per the WFD Report, have not met GES.
- **Water Quality Degradation**: Inadequate wastewater treatment, combined sewer overflows, and agricultural run-off contribute to widespread contamination, evidenced by toxic algal blooms (e.g., Lough Neagh) affecting marine environments.

<u>Underwater Noise</u>

- Status is uncertain due to lack of data and thresholds for GES. The main issue for us here in NI is that management measures only focus on fisheries. Currently no management measures have been implemented by DAERA for marine mammals - see Storymaps for marine SACs[42].
- The **extent to which UK seas are achieving GES for anthropogenic sound (noise pollution) is uncertain**, as determined by the 2019 assessment.
- **Unsustainable Development**: The limited marine area in Northern Ireland faces increasing pressure for spatial competition. Inappropriate siting of developments, such as offshore wind farms, can lead to adverse effects on MPAs and their features, as seen in England.
- **Noise Pollution**: Anthropogenic noise from marine activities poses a significant risk to marine animals, especially cetaceans, leading to disturbance and disorientation.

<u>Commercial Fish and Sensitive Fish</u>

- Only partially met. This will require improvements to biosecurity measures of aquaculture and inshore fisheries.
- Sensitive fish species are recovering, but demersal fish communities are deteriorating (something which the Irish Sea Demersal FMP should resolve[43]. Combined with England's maintained closure of the Sandeel fishery[44]) (D1, D4)
- Commercial Fish and Shellfish (partially met) - only 42% of marine quota and 11% non-quota shellfish stocks achieved GES. Further work needs to be done here within our developing FMPs and ensuring those measures implemented can be truly assessed for effectiveness. (D3)
- **Elasmobranchs (sharks, skates, and rays)** have experienced drastic declines from past over-exploitation and are failing to achieve GES.
- **Unsustainable Use of Marine Resources**: This includes practices within the fishing industry, such as **habitat loss and disturbance from bottom trawling and scallop dredging**, overfishing, and bycatch. Overfishing drives a significant portion of sharks and rays towards extinction.

Marine Litter

- Marine Litter - decreasing litter on beaches, but NI is producing a Plastic Pollution Plan[45] and recent pressures have been somewhat alleviated through UK Plastic Wet Wipe Ban[46]. Plastics found in the stomachs of Fulmar and other species. (D10)
- The assessment in 2019 determined that the UK had **not yet achieved GES for marine litter**, with beach litter levels in the Greater North Sea having slightly increased since 2012.
- **Marine Litter and Plastic**: Millions of tonnes of litter, primarily plastic, enter the ocean annually, causing harm to hundreds of marine species. 90% of marine litter on Northern Ireland beaches in 2022 was plastic[47]. Wet wipes, often mislabelled as "flushable," are a significant source of microplastics.

Food Webs and INNS

- Food Webs (not met) - links here to the Demersal Fish species as well as planktonic communities. Change in fish feeding guild biomass mixed with spatially extensive increases in benthivores (D4).
- NIS (Non-Indigenous Species) - not enough data and a lack of comprehensive monitoring. Need for a robust biosecurity programme and security measures framework for NI - especially when trying to implement native oyster recovery and establishment in the MPA Network (D2).
- **Invasive Non-Native Species (INNS)**: These are a main direct driver of biodiversity loss, with examples like the pacific oyster devastating native species and habitats.

Climate Change and Hydrological Conditions

- Hydrological Conditions assessment has not been conducted; therefore NIMTF would question whether a true assumption can be made about meeting GES since 2019 without the assessment being carried out.
- Unsure fully how climate change will impact GES indicators in the future. Most indicators do not identify the change in prevailing conditions as the main issue in meeting GES - but we know that there is a twin between climate change and biodiversity loss. Both need to be tackled, but sustainably.
- Marine heatwaves decimate benthic species and habitats, which are unable to escape from an area where the pressures become focused. BCAP and the MPA Strategy set out the requirements for a climate smart MPA Network.
- **Climate Change**: Recognized as one of the biggest impacts on biodiversity, climate change leads to rising sea levels and temperatures, species distribution shifts, and degradation of "blue carbon" habitats (e.g., seagrass, saltmarsh) which, when destroyed, release greenhouse gases.

Governance

- **Absence of a Finalised Marine Plan**: The marine plan for Northern Ireland has been in draft since 2018, hindering environmentally appropriate site selection for developments.

- **Lack of an Independent Environmental Protection Agency (EPA)**: Unlike other parts of the UK, Northern Ireland lacks an independent EPA, which undermines effective oversight and enforcement of environmental law.
- **Delayed Strategies and Action Plans**: Several marine-specific strategies (MPA Strategy Review, Blue Carbon Action Plan, Seabird Conservation Strategy, Elasmobranch Strategy) are still awaiting finalization or implementation.
- **Underinvestment and Capacity Issues**: There has been a history of underinvestment in marine and wider environmental protection and restoration, leading to reduced capacity within departments.
- **Silo Mentality**: Environmental responsibility largely falls to DAERA, hindering integrated approaches across government departments.
- **Failure to Protect Designated Sites**: Many protected sites within the MPA network are damaged and degraded, with features in "Unfavourable" condition and lacking effective management and enforcement.

2) Do you agree with the revised **overarching targets** (also known as characteristics) we have set for GES. If not, what would you change?

NIMTF feels that in order to achieve GES, keeping the characteristics mostly the same, whilst expanding on them to ensure we are achieving a full encompassing understanding of the different metrics which contribute to them will be beneficial. We have provided further comment on the changes to the indicators for each section within our answer to Question 3b, whilst highlighting the overall issues that have been identified within Question 1b and Question 3a.

The focus on achieving GES for each characteristic means to ensure we are using the most up to date information and evidence, and using the Precautionary Principle where we are data deficient to assess the interaction with pressures to establish a robust data programme which can help us to achieve GES for those species and habitats.

Achieving GES under the UKMS has been a core target of the newly published Environmental Improvement Plan (EIP) 2024 for Northern Ireland[48] - highlighting that GES needs to be achieved for our seas; with the main mechanism highlighted as sustainable industrial usage of our seas alongside MPAs.

NIMTF would advocate for the changes highlighted within the UKMS for these characteristics side-by-side with the 2019 ones to ensure that full transparency can be made. Characteristics must ensure that they are highlighting where evidence gaps are going to be met through their indicators, whilst acknowledging where impacts are already taking place and the actions being taken to reduce those pressures and drivers preventing us from achieving GES. NIMTF have previously highlighted these issues to the Office for Environmental Protection[49]. In addition, our response was also incorporated into the Environment LINKS UK response to the OEP[50].

3a) To what extent are the proposed criteria to be used in the next assessment cycle sufficient to guide progress towards achievement of GES? We would like your feedback on both those that have changed, and those that remain the same.

Seals and Cetaceans

- Need to include specific points about Harbour Seal as currently there are only those in place for Grey Seals which have met GES.
- Assess the need for a UK Cetacean Strategy to add to the suite of Conservation Strategies which are already in place - particularly in NI (e.g. Seabird Conservation Strategy and Action Plan and Elasmobranch Conservation Strategy).
- Ensure there is sufficient allocation for protecting prey species 'Herring' for cetaceans.

Marine Birds

- Alignment of Seabird Conservation Strategies and Action Plans across the devolved nations, which also align action on tackling Highly Pathogenic Avian Influenza (HPAI).
- UK SPA Sufficiency Reviews need to be carried out to assess effectiveness, which complements or adds to the 'ecological coherence' of the MPA Network
- Go further on the sandeel fisheries and also ensure there is sufficient allocation for protecting prey species 'Herring' for marine birds.
- Greater understanding of the impact of climate change on breeding and foraging grounds on a transboundary component.

Fish

- Bycatch mortality not being used is an underrepresentation.
- Focus on this should be achieved through implementation of FMPs, with a core focus on implementation of actions, alongside monitoring and enforcement
- Impacts on sensitive fish (e.g. Elasmobranchs) could be alleviated through co-ordinated and aligned national Elasmobranch Conservation Strategies - such as NI's one in draft. Alignment of these conservation strategies with existing FMPs for Demersal Fish should help to alleviate bycatch issues for these FMPs
- Publication of an NI Marine Plan which sets out an ecosystem-based approach to sustainable developments in NI seas. Alignment and co-ordination with other marine plans in transboundary regions.
- TACs should be set to be below Maximum Sustainable Yield to enable and promote sustained and thriving wild populations through the addition of the Precautionary Principle where necessary.

Pelagic Habitats

- Focus on nitrogen-based impacts to reduce impacts to marine systems. These need to be aligned not only to direct marine sources of pollution, but also to Freshwater inputs to prevent a two-fold impact.
- Assess impacts of plankton to 'Sensitive Fish' and other species such as some marine mammals which rely on the presence and abundance of plankton.

Benthic Habitats

- Area of habitat loss not being used to assess the physical loss of seabed habitat type from human activities is an under-representation of direct GES.
- In NI, with the developing Offshore Renewable Energy Action Plan (OREAP), the lack of an indicator not currently in place for 'Offshore structures and other activities' is an under-representation and shows that we are under-prepared for the potential impacts of offshore renewable developments if not done sustainably.
- Appropriate use of the Mitigation Hierarchy will be needed when assessing the above to ensure we are **avoiding, mitigating, minimising and then compensating** for each development. But this needs to be in the overarching framework for these.

Marine Food Webs

- The fact that we are still uncertain about the balance of abundance between representative feeding guilds to highlight an imbalance within regional and mixed food webs is concerning. FMPs for pelagic and demersal stocks where mixing takes place has the potential to impact across wider food webs. This is intrinsically linked to Pelagic Food Webs.
- Greater data and funding should be provided to meet this. Technically action in this area should be initiating the Precautionary Principle and ensuring that the data is available, especially in terms of developing offshore renewable energy developments and the lack of an NI Marine Plan.

NIS (Non-Indigenous Species)

- The presence of non-native invasive species poses a great risk for biodiversity's recovery. Establishment of native oysters to meet the gap within the MPA Network in NI is put at risk by the changing status quo of Pacific Oysters.
- Development of OREAP means there is potential for existing structures to become transient hotspots for INNS.
- An increase in vessel transport and shipping routes could mean the increased dispersal of INNS around NI.
- The Marine Biodiversity Data Portal NI[51] is intended to be a main repository for INNS in NI. There needs to be greater alignment across the UK to ensure we are tackling INNS.
- Many issues with INNS is the distinct lack of actions to tackle or manage invasive species once they have already established. There is a greater focus of preventing new settlement on structures in areas where establishment has already taken place, rather than directly tackling the issue where it is present.

Commercial Fish

- Ensure MSY is met or above for wild populations. Fishing pressure needs to be alleviated or reduced to sustainable levels.
- Greater actions which focus on pressure reduction, monitoring and enforcement need to be prioritised within FMPs.

- Funding for enforcement and monitoring of FMP actions need to be greatly improved and provided.

Eutrophication

- Nitrogen has been acknowledged as needing to play a greater part in the marine and coastal environments.
- Direct impacts from sources of pollution need to have regulations and controls on nitrogen. Alignment is needed between marine environments, but also from Freshwater environments which flow down into the marine environment.
- Improvement in nutrient modelling as well as hydrological condition assessments which has already been established as not being delivered.
- Direct links to the NI Coastal Observatory for assessing benthic topography, combined the MOSAIC project carried out by AFBI will be imperative to better understand impacts of the seabed and how this influences the dispersal rate of nutrient concentrations.

Hydrographical Conditions

- "Whilst no formal assessment is offered in this consultation, we assert that Hydrographical Conditions (D7) has met GES, based on the same premise presented in the 2019 assessment." NIMTF would like to see the available indicators which collectively contribute to the assessment and how the methodology is calculated more transparently. It also states that within "Trend since 2019" that marine plans are now complete across the devolved nations. In NI there is no finalised version of the NI Marine Plan which has been in draft since 2018. This does not meet the criteria. Even the ROI is in the process of consulting on their second phase of the Marine Planning Framework.

Contaminants

- NIMTF would query the statement that "some chemicals that are at higher levels than environmental thresholds do not appear to be having any biological impacts". The question would need to be asked if all marine species are being assessed for impacts associated with ecotoxicology.
- Further work is needed to meet the associated indicator of "Imposex in dogwhelks". For NI, we are seeing the development of an Intertidal Hand-Gathering of Shellfish FMP, which whilst this does not include dogwhelks, does include periwinkles which is a prey item. Improvements to regulation will help to prevent a destabilisation within intertidal food webs.
- Greater work is needed to assess the source of heavy metal pollution and policies need to be developed to aid in the removal of heavy metals to prevent further impacts.

Contaminants in Seafood

- Whilst there is no finfish aquaculture taking place in NI, there are developing FMPs associated with pelagic and demersal species which will be impacted. Further work is needed to ensure that there is compliance with Food Standards Agencies to ensure a high quality

product as is needed under the Fisheries Act (2020) and the Joint Fisheries Statement (JFS) which all developing FMPs should be complying with.
- NIMTF would recommend changing “To consider how to fill remaining evidence gaps for finfish” with “To assess and implement filling remaining evidence gaps for finfish” - otherwise the indicator will not be actioned.

Marine Litter

- The primary issue that has still to be met is the presence of marine litter on the seabed.
- Whilst this issue is devolved, there needs to be collective action such as signing up to the Global Plastics Treaty[52] and NI implementing a Plastic Pollution Plan which is currently open for consultation. Each devolved nation needs to action some form of marine litter/plastic action strategy which is being effectively implemented.
- Greater collaboration needs to be in place to identify sources of marine litter and plastic pollution entering all waterways given that freshwater environments all flow down into the marine environment.
- Standardisation of quantitative data needs to occur to provide better comparisons about work being done across the different devolved nations.
- Plastic pollution in particular does not degrade in the marine environment, fragmenting instead which leads to greater bioaccumulation across multiple species and affecting all levels of marine food webs

Underwater Noise

- Values and thresholds need to be defined across all devolved nations
- NI is developing an Offshore Renewable Energy Action Plan (OREAP) which must consider underwater noise on cetaceans and pinnipeds[53]. This should also be applied when considering all marine licensing, making it currently difficult to have appropriate mitigation and management in place.
- Lack of thresholds also make it difficult to implement management measures for SACs, where underwater noise regulation will have a direct impact in improving the condition status of protected species.

To provide sufficient guidance for achieving Good Environmental Status (GES) in the next assessment cycle, NIMTF recommends a multi-faceted approach encompassing robust targets, specific measures, and foundational governance improvements. The current situation highlights an urgent need for this, as the UK is failing to meet 13 out of 15 indicators for healthy seas, and Northern Ireland's coastal waters are not achieving GES due to persistent pressures.

NIMTF highlights the specific policy gaps which are currently in play which are preventing Northern Ireland from contributing to achieving GES across NI and thus, our contribution to the UKMS.

3b) To what extent are the proposed indicators to be used in the next assessment cycle sufficient to guide progress towards achievement of GES? We would like your feedback on both those that have changed, and those that remain the same.

NIMTF have highlighted our perspective on the proposed indicators and where we feel they need to go further for each descriptor:

Seals

- Welcome the inclusion of marine mammal bycatch as this is a requirement for all FMPs under the JFS and Fisheries Act.
- Needs to include specific indicators for Harbour Seals and their pups - so that this aligns better with Grey Seals which are meeting GES.
- “Harbour seal pup production” as a proposed inclusion
- Inclusion of an indicator which assesses the impacts of abundance, migration and reproductive rates of pinnipeds in response to underwater noise

Cetaceans

- Compartmentalising the two indicators from 2019 makes sense
- Standardising to marine mammal bycatch is welcomed
- Inclusion of an indicator which assesses the impacts of abundance, migration and reproductive rates of cetaceans in response to underwater noise

Marine Birds

- NIMTF are seeing from the latest Seabird Census that our tern species are not doing very well at all and would like to see specific inclusion of these as a collective within the indicators
- “Tern breeding success” either in addition to “Kittiwake breeding success”, or highlighting all the species this would relate to.
- Welcome the inclusion of Seabird bycatch as with all of the developing FMPs, we need to assess the effectiveness of Bycatch Mitigation Initiatives set up to comply with the JFS and Fisheries Act

Fish

- Need to further explain what is changing within the indicators for the next cycle. Not clear when they read the exact same
- Would like to see inclusion around “Electromagnetic Fields (EMF) impacts on sensitive fish” as one of the proposals associated with offshore renewable energy developments
- Indicator for Bycatch Mortality needs to be developed, especially with the elevated risk through Demersal FMPs

Pelagic Habitats

- Ensure greater connection to contaminations, eutrophication and marine food webs here so that the indicators not only align, but complement collectively.
- Greater focus on the impacts of nitrogen-based sources on marine systems
- Draw key links from pelagic habitats to 'Sensitive Fish' to account for species which rely on presence and abundance of plankton

Benthic Habitats

- Area of habitat loss should be included to change the proposal of "Potential Physical Loss of Predicted Biogenic Habitats (PPL)" to "Physical Loss of Predicted Biogenic Habitats (PPL)"

Marine Food Webs

- An indicator should be present to assess the balance between abundance and representative feeding guilds to highlight any imbalances within regional and mixed food webs. This will be critical as previously highlighted for developing Pelagic and Demersal FMPs.

Non-Indigenous Species (NIS)

- Welcome the additional inclusion of registering new populations of established INNS around the UK
- Register of potential vectors which have been mitigated or managed to prevent establishment would be beneficial too.

Commercial Fish and Shellfish

- The proposed inclusions align much closely with what is expected to be included within relevant FMPs which align with the JFS and Fisheries Act.
- Wild fish populations should also be included and be linked to the Fish descriptor to further support these indicators

Eutrophication

- Welcome the inclusion of Dissolved Inorganic Phosphorus as this aligns better with Dissolved Inorganic Nitrogen. Inclusion of DIP accounts for source to sea influences from freshwater catchments.

Hydrographical Conditions

- The indicators, methods and criteria which apply here need to be further outlined to assess for any further gaps to ensure all marine environmental variables which are contributing have been accounted for.
- Accounted for through Marine Plans across the devolved nations

Contaminants

- Agreement on the inclusion of PFAS as these are a fundamental component of assessing GES under the Water Framework Directive and thus have links to this strategy.

Contaminants in Seafood

- Agreement in consolidating existing elements into a singular indicator. Need to ensure that these are inclusive of all potential contaminants which are also present in 'Contaminants' descriptor.

Marine Litter

- It would be good to outline what the narrative is changing to if the indicators are not changing to better understand this change.
- Ensure that the data which is feeding in is standardised across the different devolved nations to ensure a collective approach and comparisons of data.

Underwater Noise

- Appreciate the simplified wording to better understand the indicators better, however gaps have been highlighted in the values and thresholds needing to be defined.
- Support in developing these indicators and thresholds should be grounded in scientific evidence, of which eNGO sector can contribute.

4a) Do you feel there are any **policy gaps**? If so, please identify the gaps and explain how these could be filled?

NIMTF have highlighted the following 8 points which are preventing us from fully achieving and progressing the descriptors and indicators for GES:

- Absence and delays in crucial strategies and plans
- Weak environmental governance and oversight
- Inadequate resourcing and capacity
- Lack of robust, legally binding targets and accountability
- Insufficient protection and management of both designated sites and priority species and habitats
- Unsustainable sectoral practices (Fisheries, Development, Pollution)
- Data gaps and insufficient monitoring
- Lack of public and cross-boundary engagement

The table below highlights in greater detail on the gaps and how they can be addressed.

Table 2. Identified policy gaps preventing the achieval of GES, complete with details of the gap and how this can be addressed.

Policy Gaps	Gap Details	How to Address
Absence and delays in crucial strategies and plans	Northern Ireland currently **lacks a finalised and spatially prescriptive Marine Plan**, which is considered long overdue and critical for achieving Green Growth in a marine context. It has been in draft since 2018, with an expected publication date of end-2024. Similarly, several other marine-specific strategies, including the **MPA Strategy Review, Seabird Conservation Strategy, Elasmobranch Strategy, and a comprehensive Biodiversity/Nature Recovery Strategy**, are delayed or still in draft form.	**Urgent Finalisation and Implementation**: There is an urgent need for the immediate publication and implementation of a **spatially prescriptive, user-friendly Marine Plan** that prioritises nature-positive and sustainable development, taking an ecosystem-based approach and integrating with other frameworks like the UK Marine Strategy and MPA network objectives. **Prioritise Publication of Delayed Strategies**: DAERA must publish crucial marine strategies by the end of 2024, including the Biodiversity/Nature Recovery Strategy, MPA Strategy Review, Blue Carbon Action Plan, Seabird Conservation Strategy, and Elasmobranch Strategy. These must be underpinned by **legally binding SMART targets** and sufficient funding.
Weak environmental governance and oversight	Northern Ireland is the only part of the UK that **lacks a separate and independent Environmental Protection Agency (EPA)**, which is seen as critical for effective oversight and enforcement of environmental law and to ensure political neutrality. There is also a **"silo mentality" within government departments**, with environmental responsibility falling almost entirely under DAERA.	**Establish an Independent EPA**: A **well-funded independent EPA** must be established to provide effective oversight and enforcement of environmental law and protect civil society's access to environmental justice. This would separate policy and regulatory powers from DAERA. **Cross-Departmental Mainstreaming**: Environmental responsibility must be **mainstreamed across all government departments** (e.g., Health, Communities, Infrastructure, Economy), as marine environmental health impacts and supports the work of these wider departments.
Inadequate resourcing and capacity	There is a history of **underinvestment** in marine and wider environmental protection and restoration. The NI environmental budget reportedly fell by approximately 20% since 2009/10, with an estimated **£1 billion financing gap** for protecting and restoring biodiversity. Funding is often competitive, sporadic, and insecure, limiting the long-term potential of conservation projects.	**Consistent and Substantial Funding**: Provide **dedicated, long-term, and ring-fenced financial backing** for monitoring, management, enforcement, and restoration projects. This includes exploring private sector finance and establishing an investment readiness fund for nature-based projects. **Increased Staffing and Upskilling**: Allocate sufficient dedicated staff and invest in upskilling and capacity building within the conservation sector.
Lack of robust, legally binding targets and	The current targets, such as achieving Good Environmental Status in seas by 2027, are considered **disappointingly**	**Ambitious, Legally Binding Overarching Targets**: Implement a SMART target for Northern Ireland's environment for the NI Executive to ensure "the

accountability	**unambitious**. There is a lack of timeframes for specific actions within strategies, and worrying silence on how effectiveness will be assessed and what will happen if targets fail.	**protection, recovery and where necessary, the active restoration of the environment by 2030, so that native habitats, species and communities thrive, natural ecosystem functioning flourishes, and neither are hindered by human activity**". **SMART Targets and Accountability**: All targets should be **SMART (Specific, Measurable, Achievable, Relevant, Time-bound)**. Robust accountability processes are vital to ensure strategy effectiveness and priority. Updates to targets should only strengthen them, not lower them.
Insufficient protection and management of both designated sites and priority habitats/species	Northern Ireland's Marine Protected Area (MPA) network is **incomplete**, with identified gaps in representation (e.g., Native Oyster beds) and replication. Many existing MPAs and features are in **unfavourable condition**, and management plans are either absent, delayed, or not adequately implemented, monitored, or enforced.	**Complete and Effectively Manage MPA Network**: Address gaps in MPA designation, including for Native Oyster beds and key sites for Black Guillemot. Develop and implement **robust, ambitious, actionable, user-friendly, and well-resourced management plans** for all MPAs, with SMART targets focused on species recovery. **Improve Monitoring and Enforcement**: Implement **consistent, regular monitoring** of designated features (more frequent than every 6 years). Ensure **robust enforcement mechanisms** are in place, including the roll-out of **Inshore Vessel Monitoring Systems (I-VMS)** for vessels under 12m and **Remote Electronic Monitoring (REM)** for all vessels. **Climate-Smart MPAs**: Ensure MPAs contribute to climate resilience by protecting and enhancing carbon storage habitats. The potential role of **Highly Protected Marine Areas (HPMAs)** should be explored and implemented, taking a "whole site approach".
Unsustainable sectoral practices (Fisheries, Development, Pollution)	**Unsustainable fishing practices** (e.g., bottom trawling, scallop dredging, overfishing of stocks like cod and whiting) are persistent, contributing to D1, D3, and D6 not meeting GES. There is also **unregulated hand-gathering of shellfish**. **Unsustainable development** is increasing pressure on limited marine space, exacerbated by the lack of a marine plan. **Pollution from land-based**	**Sustainable Fisheries Management**: Shift to **truly sustainable practices** with an ecosystem-based approach. Implement **full documentation and monitoring** (I-VMS and REM). Protect key habitats and prey species (e.g., sandeel) and essential habitats for spawning and juveniles. Address harmful practices and implement bycatch mitigation plans. Finalize and publish Fisheries Management Plans (FMPs) and the Joint Fisheries Statement (JFS). **Sustainable Development**: Implement **strategic, fit-for-purpose marine planning and licensing** that

	sources (inadequate wastewater treatment, combined sewer overflows, agricultural run-off) and **marine litter** are key pressures. **Underwater noise** impacts are uncertain, and mechanisms for collating future noise impacts are lacking. Invasive Non-Native Species (INNS) are also a concern.	prioritises the environment and applies an ecosystem-based approach. For offshore renewable developments, adhere to the **mitigation hierarchy** (avoid, minimise, restore, compensate) and the **precautionary principle**. **Pollution Control**: Drastically reduce **land-based pollution** through increased investment in wastewater infrastructure and monitoring. Urgently develop and implement an **updated Northern Ireland Marine Litter Strategy** and engage with the latest program of measures, including supporting a **ban on plastic-based wet wipes**. Implement mechanisms for collating future noise impacts and consider noise in all licensing applications, with potential grounds for denial if not mitigated. **INNS Management**: Develop and implement action plans for INNS with clear management objectives and robust biosecurity measures to prevent their introduction and spread.
Data gaps and insufficient monitoring	There are **knowledge gaps** regarding blue carbon potential (distribution, health, carbon storage values), species interactions with offshore infrastructure, migratory patterns, the true condition of the MPA network, and for non-quota commercial species. The methodology for assessing the classification of "data deficient" and "data rich" populations for species like elasmobranchs is unclear.	**Comprehensive Data Collection and Monitoring Programmes**: Prioritise **increased data collection** on blue carbon habitats, species distribution, health, and carbon sequestration rates. Develop and implement **multi-annual data collection plans** for seabirds. Address data gaps for elasmobranchs and other species, potentially through a review of existing data and engagement with eNGOs. **Evidence-Based Decision Making**: Apply the **precautionary principle** where data is insufficient or uncertain, limiting or preventing activities to avoid negative impacts. Ensure that monitoring results feed into an iterative management process. **Integrate Blue Carbon into GHG Inventory**: Raise awareness of blue carbon's contribution to the UK's greenhouse gas inventory under the Paris Agreement.
Lack of public and cross-boundary engagement	There is a **disconnect between people and nature**, particularly in the marine environment, leading to a lack of drive for action. Historic difficulties with cross-border management due to	**Enhanced Public Engagement and Ocean Literacy**: Increase public access to the marine environment and understanding of threats and ecosystem services. Promote citizen science projects and integrate marine focus into the NI curriculum.

	differing governance structures and enforcement challenges are evident.	◦ **Transboundary Cooperation**: Establish mechanisms for **North-South (Republic of Ireland) and East-West (other UK nations)** cooperation for policy alignment and active cooperation, given the interconnected nature of marine ecosystems and mobile species. Establish a **North-South marine biodiversity forum**. By robustly addressing these identified policy gaps through strategic planning, increased investment, strengthened governance, comprehensive data collection, and collaborative engagement, Northern Ireland can make significant strides towards achieving Good Environmental Status in its marine waters.

4b) Do you feel that there are any **evidence gaps**? If so, please identify the gaps and explain how these could be filled?

- Species interactions with developments
- Knowledge of where species and habitats are going to shift to as a result of climate change
- Gaps which have already been highlighted in Question 4a

NIMTF thanks DEFRA for the opportunity to respond on the consultation to update Part One of the UK Marine Strategy. As outlined above, the recommendations, actions, policy, data and gaps all need to align together to address the issues facing the health of our seas. NIMTF will continue to work with DAERA and key stakeholders to align marine environmental policy to ensure holistic actions to meet improvements to the health of our seas.

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

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