

The Sustainable Water Network (SWAN) is an umbrella network of 25 of Ireland's leading environmental NGOs, national and regional, working together to protect and enhance Ireland's water environment. We were delighted to be part of the MPA Advisory Group's stakeholder sessions in Cork. SWAN's Marine & Coastal Policy Officer attended the 9<sup>th</sup> February stakeholder session along with representatives from some of SWAN's member organisations (Cork Environmental Forum, Irish Whale & Dolphin Group and BirdWatch Ireland). We welcomed the opportunity to engage with members of the Advisory Group, as well as DHLGH representatives and other interested stakeholders from industry and academia. SWAN welcomes the consultation aspect of this process and ability for a range of stakeholders to feed in. However, we believe that engaging stakeholders earlier in the process than two months before the report is finalised would be more beneficial. The Advisory Group discussed that ideally they would have 8-12 months to properly conduct their analysis and publish a report; this timeframe would also allow for greater stakeholder engagement throughout the process.

Evidence-based ecological mapping is a vital step in the consideration of where to designate Marine Protected Areas (MPAs) to have the greatest benefits to conservation and restoration, maximising protection of habitats and species. We are therefore glad to see the ecological sensitivity analysis led by scientists from UCG, UCD and the Marine Institute. However, we must repeat our disappointment, expressed at the workshop, that the criteria for consideration excludes any feature that is included in the EU Habitats or Birds Directives. The ecological analysis cannot be considered thorough when it ignores the most vulnerable species, including all cetaceans that are found in Irish waters and most species of breeding seabirds. While Natura 2000 sites exist for the protection of these species and habitats, MPAs are more effective when they are larger and connected, and the MSFD requires a coherent network of representative MPAs; therefore, consideration of expansion of existing sites must consider species and habitats already protected by Natura 2000 sites. For example, existing Special Protection Areas (SPAs) for seabirds generally only cover their breeding colonies, not their foraging ranges at sea, where these species are often more vulnerable to pressures. Similarly, a few Special Areas of Conservation (SACs) are designated for bottlenose dolphin and harbour porpoise, but by not including these species in the ecological sensitivity analysis, the opportunity to further protect them while migrating outside the SACs is missed.

Additionally, the analysis prioritises industry, not nature, by weighting DMAP areas and areas with existing high levels of fishing pressure to disincentivise Prioritizr from considering these regions for MPA designation. Planning must put nature first by analysing ecological sensitivity across the full region, not just outside these areas experiencing high levels of anthropogenic activity.

Finally, SWAN suggests that for this and future ecological sensitivity analyses, features are weighted in Prioritizr modelling according to their ecological importance and/or vulnerability, such as factoring in the importance of seagrass beds as carbon sinks.

SWAN believes that it is critically important that the significant weaknesses identified above are addressed in future ecological sensitivity mapping processes.

Specifically:

1. We are calling on the DHLGH to provide the MPA Advisory Group a longer period to conduct their sensitivity mapping and stakeholder engagement.
2. SWAN emphasises the importance of including all vulnerable species and habitats in the region, rather than removing those listed in the EU Directives from the criteria.
3. We urge you to put nature first, and prioritise the ecological importance of regions, rather than weighting DMAP and fishing areas out of consideration.