Feedback Document

by

THE IRISH MARITIME FORUM

To the
Department of Housing, Planning and Local Government

MARINE SPATIAL PLANNING

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The Irish Maritime Forum (TIMARFOR) acknowledges the very positive start of the process to develop a Marine Spatial Plan for Ireland and wishes to complement those involved in rolling it out. Our members attended the various launches of the Baseline Report held throughout the country and reported on the quality of the presentations and the positive engagement by stakeholders.

In submitting feedback for this stage of the MSP process TIMARFOR wishes to restate some of the points made in our original submission to your group. We do so based on Ireland's high degree of economic dependency on marine transport. At the various launches of the Baseline Report various stakeholders rightly set out their positions. These stakeholders ranged from Seaweed Harvesters to Trout Anglers. While not wishing to diminish the importance of these activities to the relevant participants, TIMARFOR would like to see Shipping receive the importance it deserves. It was noticeable that at the launches the representatives of shipping interests on the podium were officials of the ports. We would like to see more emphasis on what happens the ship outside the environs of the port authority.

Growth in the world economy is expected to result in an increase in ship traffic in decreasing sea space. In addition there will be competition for space between activities such as oil and gas production, offshore renewable energy, commercial fishing, aggregate dredging, mining, aquaculture, recreation and government imposed restricted zones such as Special areas of Conservation and Defence Exercise Areas.

MSP discussions are likely to be emotive and controversial. It is important to note that MSP is the “planning” stage and it will need to be integrated with the full management process including monitoring, enforcement and re-evaluation.

It is very easy for non-mariners to assume that shipping operations and shipping lanes can be altered without consequences to accommodate new demands such as those mentioned above. In some cases the rerouting of a shipping lane may be justified to provide food or energy to a community. In other cases such rerouting may increase the risk of collision or grounding to an unacceptable degree or change the commercial dynamics of a region so that ports or shipping services become uncompetitive.
When considering the rerouting of shipping lanes or the placement of MSP limitations on sea space, the manoeuvring characteristics of ships both in normal and abnormal conditions must be considered. Non-mariners often consider that offshore sea lanes do not need much more “Corridor Width” than in-port channels. What must be understood is that service and support levels in port differ from those offshore as do navigational accuracy and visual references. Also the impact of wind and weather on ships in the open ocean is very different from that in the sheltered waters of a port.

It is imperative that maritime professionals are participants in the discussion and determination of the common vision for MSP. Without such participation there is a significant risk that MSP will not include full consideration of the existing and potential economic activities in Irish controlled sea space.

We are fortunate in Ireland to have significant maritime expertise on which to call. The Navy is probably the largest repository of professional mariners in the country. This expertise is reinforced by the growing educational, scientific and research cluster that is the National Maritime College of Ireland, the Beaufort Centre and the Marine Institute. The Commissioners of Irish Lights will have considerable expertise on Aids to Navigation and Traffic Separation Zones and are backed up by the International Association of Marine Aids to Navigation and Lighthouse Authorities. In addition there is maritime expertise to be found in The Nautical Institute (Ireland Branch), the Irish Institute of Master Mariners, the Irish Chamber of Shipping and the various shipping companies based in Ireland. Marine Safety and Search and Rescue expertise can be found in the Irish Coastguard and the Marine Survey Office. Of course it goes without saying that The Irish Maritime Forum stands ready to offer expert advice and assistance as required.

Recommendations (Restated)

1. That the generation and implementation of a Marine Spatial Plan for Ireland must include the broadest range of stakeholders possible.

2. That Maritime Professionals be involved at every stage of the process.

In addition to the re-stating above of some points in our original submission we wish to add the following.
A Marine Spatial Plan for Ireland should take into consideration future legislation for commercial shipping such as the Sulphur cap in 2020. Ship Routing should minimise transit times so as to limit particulate matter, Nitrogen (NOx) & Sulphur (SOx) emissions from ships which are not only harmful to the environment but also to human health.

The Energy Efficiency Design Index will be debated by the International Maritime Organisation in 2019 and decide whether engines will be only required to power a ship up to Beaufort Scale Force 7 (Near Gale) constraining their ability to manoeuvre in poor weather.

TIMARFOR believes that the scale and strategic nature of the state investment in National Maritime College of Ireland justifies its specific inclusion at Annex A of the NMPF Baseline Report as a ‘Public Bodies with Marine Responsibilities’. The omission of NMCI from that Annex is even more glaring when we find, identified in the ‘Functional Responsibilities’ column, such very pertinent entries as: Future Skills Needs – Marine Sector, and Research, development and innovation – Marine Sector. Since government policy and decisions in relation to NMCI were based on the Report of the Taskforce on Seafarer Training and Employment (1998), the Annex A entries should reflect that development, especially the unique significance of a dedicated establishment providing maritime education and training common to both mercantile and naval professions.

Paragraph 7.5 of the National Marine Planning Framework Report notes that the Navy is the State’s principal seagoing agency. Paragraph 7.14 notes that the Navy and the Air Corps protect Ireland’s interests at sea. We recommend that these facts be borne in mind when considering the regulatory and enforcement regime to underpin MSP. Also a regulatory and enforcement regime must be backed up by legal sanction. In making this point we would refer to HOOW.

“Ireland must have in place effective and efficient security and surveillance arrangements and quality maritime regulatory regimes that meet best practice within which our ocean wealth can prosper”.