



**Manx
Wildlife Trust**
Treisht Bea-Feie
Vannin

Manx Wildlife Trust

7-8 Market Place, Peel
Isle of Man. IM5 1AB

Registered Charity N° 225(IOM)
Registered Company N° 5297C
VAT registered N° GB 005 4194 08



Wednesday, 09 April 2025

Dear MWT Supporter,

We are pleased to inform you that DEFA are currently conducting a public consultation about the potential to create an eleventh nature reserve in Manx waters. This is great news!

In 2021, Manx Eelgrass Group, MWT staff and local scuba divers documented and mapped a new Eelgrass bed in Bulgham Bay which had been reported a few years previously. Eelgrass is a species of seagrass and is the only flowering plant to be found in Manx waters. It is a highly protected species in the Isle of Man because it forms a rare and vitally important habitat known as seagrass beds. Recognising that seagrass beds are an important 'blue carbon' and biodiversity resource, DEFA now propose to make this seagrass bed a fully protected Marine Nature Reserve (MNR) under the Wildlife Act 1990!

MWT have been working closely with our friends at DEFA in this regard and have also suggested to them that this would be a good opportunity to also protect other vital marine habitats in this area, including the saltmarsh at Cornaa and the kelp forest and intertidal habitats at Port Mooar.

The public consultation therefore seeks *your* views on the creation of a new MNR at Bulgham Bay alone (Option 1), or whether (as MWT recommended) it should extend northwards to include the saltmarsh at Cornaa (Option 2) or further north to include Port Mooar & Maughold Head (Option 3).


It will be no surprise to MWT members that we are supporting Option 3; however, we have gone further by recommending that Option 3 as proposed should be altered through an amendment to the existing Laxey Bay MNR rather than a wholly new MNR. Extending the existing MNR up to Maughold Head would connect the existing Laxey Bay MNR to the Ramsey Bay MNR, ensuring that the entire coastal waters of Maughold are protected in a coherent, unbroken chain.

At the same time, based on the excellent collaborative work between MWT-coordinated Manx Eelgrass Group & Isle of Man Seasearch along with the DEFA-coordinated Blue Carbon Project, our Government are also proposing to:

- create a new Eelgrass Conservation Zone in Derbyhaven Bay (these are highly protected areas within a MNR, where additional byelaws prohibit anchoring and potting),
- expand the existing Eelgrass Conservation Zones in Laxey Bay MNR and Ramsey Bay MNR, reflecting that since their legal protection, the seagrass beds there have expanded considerably.

MWT are therefore writing to all our members and supporters to seek your help in advocating for these proposed expansions to Eelgrass Conservation Zones all around our Island, while also protecting coastal waters in Maughold from development, extraction, dumping and destructive fishing techniques. We are asking all MWT members to complete this consultation because:

- The coast from Laxey Head northwards to Maughold Head is the longest stretch of Manx coastal waters with **no legal protection**.
- The coast and coastal waters of Maughold are internationally recognised as being of **global importance for nature**. Specifically, this coastline is recognised as:
 - An **Important Marine Mammal Area** for Grey Seal (haul outs and pupping sites), Harbour Porpoise and other cetaceans (*IUCN Marine Mammal Task Force*)


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- An **Important Bird and Biodiversity Area** for breeding Chough, red-listed Shag and other declining seabirds (*BirdLife International and RSBP*)
- A **Candidate Ramsar Wetland of International Importance** for its diversity of habitats and species, both above and below the waves (*UKOTCF & UK JNCC*).

The consultation contains a lot of background information and could be quite daunting, however ultimately there are *only seven simple questions* regarding your thoughts on DEFA's proposals. If you skip the background reading, the consultation can be completed in as little as 10 minutes but could take 30 minutes or more if you wish to read all of the detail. To help MWT members, we have attached MWT's responses to this letter, which you are free to copy, or otherwise use if you wish.

The Isle of Man has voluntarily signed up to the international, legally binding commitment to protect and manage, as a minimum, 30% of our land and seas for nature by 2030 ("30 by 30").

We are falling far short of the mark in this regard. As of today, only 4.3% of our land and 10.8% of our waters are fully protected under the Wildlife Act. As a UNESCO Biosphere Reserve, we simply cannot fail to meet this requirement. Protection of the Maughold coast is a significant opportunity to achieve our "30 by 30" requirement.

The warmer the reception of the Manx public is to these proposals, the more likely these enhanced protections will become a reality. Please do take the time to submit your views and please do forward this letter to your family, friends, neighbours and colleagues. Manx nature cannot speak up for itself; we must take up this responsibility.

Please note that submissions will close at midnight on Monday 28th April 2025. To complete the consultation please click [here](#) or search online for "**Bulgham MNR consultation**". If you would like a paper version on the questionnaire, please contact fisheries@gov.im or telephone DEFA on 685835.

Thank you for giving Manx nature a voice! Gura mie eu!

David Bellamy

**Head of Conservation & Land – Ard-reireyder Freayll as Çheer
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MWT's Response to the Bulgham Bay, Maughold Coast and Eelgrass Conservation Consultation

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N.B. On this page are anonymous person-specific questions.

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Q. What are your views on DEFA's three objectives?

A. MWT fully endorse and support DEFA's three objectives for protecting blue carbon and biodiversity habitats, as they collectively strive to meet our Island's requirements under the Wildlife Act, our Biodiversity Strategy, the Climate Change Act, our Biosphere Strategy, the Ramsar Convention and the OSPAR Convention. We congratulate DEFA on their work to protect Manx coastal and marine habitats and species.

Q. In your opinion, how should the objectives be prioritised by the Department when considering proposals for protecting blue carbon/biodiversity habitats? Please rank them in order of importance with 1 being high importance and 3 low importance.

A: Objective 1 – 3 (lowest priority)
Objective 2 – 2 (medium priority)
Objective 3 – 1 (highest priority)

Q. Please explain your view

A. The coast from Laxey Head northwards to Maughold Head is the longest stretch of Manx coastal waters with no legal protection, which is contrary to its long-held recognition as an area of international importance, including as an Important Marine Mammal Area for Grey Seal haul outs and pupping sites (ref: IUCN Marine Mammal Task Force), an Important Bird and Biodiversity Area for breeding Chough, red-listed Shag and other declining seabirds (ref: BirdLife International and RSBP) and as a Candidate Ramsar Wetland of International Importance for its diversity of habitats and species, both above and below the waves (ref: UKOTCF & UK JNCC). We are pleased that 33 years after this coastal area was first recognised as being of international importance, that the Department is now proposing its formal protection.

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Q. Having considered the three options, which (if any) is your preferred option?

A. Option 3 (Skeirrig to Maughold Head MNR)

Q. Please explain your view

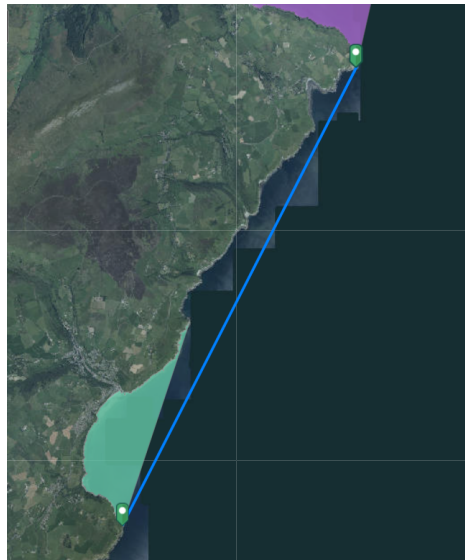
A. Option 3 encompasses the largest area and protects the greatest diversity of habitats and species of conservation interest. It also provides connectivity with the Ramsey Bay MNR and achieves the "Lawton Principles" for nature reserves: "more, bigger, better and connected". It also better achieves the Biodiversity Strategy ambition to protect a representative suite of Manx habitats and is more aligned to the boundaries of the Important Bird and Biodiversity Area and Candidate Ramsar Wetland of International Importance.

Q. Thinking about your preferred option, is there any aspect of the proposal that you would change? Please explain what and why.

A. MWT recommend that Option 3 be amended to better realise the Department's three objectives in relation to protecting blue carbon and biodiversity habitats, while also better realising the Lawton Principles in relation to providing the best connectivity of protected habitats. Rather than create a



new MNR, the Department should very simply just amend the northern boundary point of the existing Laxey Bay MNR to be Maughold Head rather than the current point known as Carrick Roayrt. This very simple change would result in an adjusted MNR covering "Laxey Bay and Maughold Coast", providing protection for the existing and proposed areas while providing better ecological connectivity and better aligning to the Candidate Ramsar Site and Important Bird and Biodiversity Area, without any significant impact on commercial fisheries.



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Q. The department is keen to hear from individuals (or companies) who utilise both the proposed MNR and ECZ expanded areas for either commercial or recreational use. Please state below which sites and whether you utilise these areas for commercial or other activities.

A. We utilise all of these areas for the purposes of nature conservation, ecological research and recreation. We also recognise their potential for ecotourism, sustainable fisheries and for human well-being.

MWT believe that all Eelgrass must be treated equally owing to DEFA's statutory responsibility to protect eelgrass beds under the Wildlife Act 1990 and Climate Change Act 2021. We also recognise that ECZs work, as is demonstrated by the significant recent expansion of Manx seagrass beds.

We recommend that the existing Baie ny Carrickey ECZ, the existing Laxey Bay ECZ, the existing Ramsey Bay ECZ, the proposed Bulgham Bay ECZ and the proposed Derbyhave ECZ should all utilise the Highest Astronomical Tide as the landward boundary (mirroring that of the Fort Island Gully ECZ) to a) align them to the MNR boundaries, b) reduce ambiguity for sea users whilst at sea who may not have access to detailed mapping, c) enhance clarity through more streamlined regulations and d) increase site protection, all while having negligible impact on sea users as these narrow strips of mostly intertidal waters are of little use for anchoring or potting.