Commissioners of Irish Lights
Response to Call for consultation on the Statement of Strategy for Transport, Tourism and Sport 2017-2019

Introduction.
The Commissioners of Irish Lights is the General Lighthouse Authority (GLA) for the island of Ireland and its adjacent seas and islands. Irish Lights, together with the Northern Lighthouse Board (Scotland & Isle of Man) and Trinity House (England & Wales) operates an integrated Aids to Navigation (AtoN) service throughout the coastal waters of Ireland and UK. Irish Lights provide over 300 general Aids to Navigation (AtoN) and are responsible for the Superintendence and Management of 5,000 Local AtoN. Irish Lights also has authority for the marking and removal of dangerous wreck outside of harbour areas.

As a modern Maritime Safety organisation Irish Lights is committed to delivering an essential public safety service, at an economic cost, while maximising the benefit to the state of its services and resources. The DTTAS strategy review provides a welcome opportunity to considered improved alignment of relevant activity across the maritime and wider transport sector.

Irish Lights contribute directly to the Key Transport and Tourism Strategies set out in the 2015-17 strategy, particularly Transport Services and Infrastructure; Efficient and Competitive Support for Trade and Tourism; Maritime Safety; and Increasing the Economic Contribution from Tourism. We would envisage similarly close involvement in the 2017-19 strategy.

The Mission Statement of Irish Lights is to provide Aids to Navigation and Allied Services for the Safety of Persons and Infrastructure at Sea, the protection of the Marine Environment and to support the Marine Industry and Coastal Communities.

In addition to its core statutory services Irish Lights is actively involved in the provision of commercial services through the use of reserve capacity in its property, technology, ship and staff as well as added value services through SLAs with other state agencies, development of coastal tourism initiatives and support for research and academic programmes. As part of its statutory role Irish Lights will be a significant participant in and contributor to the development of an Irish Marine Spatial Plan.

With over 85% of Ireland’s external trade carried by sea Aids to Navigation which facilitate the safety and efficiency of that trade must form a central part of the DTTAS Strategy.
DTTAS plans for the launch of a seafarers.ie portal are a welcome advance in the provision of online services to business. There is scope for this strategy to build on the leadership already shown by the MSO in this regard by providing for a structured expansion of these services into a broader maritime services portal for relevant state organisations and agencies.

**North / South Activity.**

The 2015/17 Strategy recognises the island of Ireland aspects of transport and tourism and commits to working through the North/South Ministerial Council. Irish Lights has always operated on an all island basis and has strong working relationships throughout all of Ireland including ports, local authorities, communities and state agencies. In addition, due to our funding arrangements through the General Lighthouse Fund and our close relationships with the UK General Lighthouse Authorities and the UK Department for Transport we have very well established East/West relationships. These relationships may become increasingly important as the EU/UK Brexit negotiations progress. The 2017-19 Strategy should include consideration of the range of relationships that exist and their importance in any future arrangements.

**Safety of Navigation.**

Maritime safety and in particular safety of navigation are critical to our nation’s economic and environmental security. As a maritime safety agency Irish Lights is primarily concerned with safe marine navigation around the island of Ireland. In practical terms this means providing visual and radio Aids to Navigation (AtoN) to mariners for positioning and voyage planning whether they are using Irish Ports / Harbours or just transiting Irish waters. AtoN are provided to serve all classes of mariner including SOLAS vessels, Fishing vessels and the leisure sector.

The provision of General AtoN and Superintendence and Management of Local AtoN is a critical element in maritime safety on our coasts. AtoN must be provided to international standards set out by the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA).

The DTTAS strategy should give consideration to a Coastal Marine Safety Code that would provide cross agency advice on appropriate standards for maritime safety in ports, in smaller harbours and piers and in marked bays and channels. Irish Lights would be willing to input to such a code in areas within our competence.

Irish Lights also provide expertise in navigational analysis to public and private bodies as well as acting as a sanctioning and superintendence body for the provision of local AtoN. The cumulative effect of our operations allows a wide range of marine traffic in terms of numbers, type and on board competencies to navigate safely, efficiently and with confidence, which in turn protects lives, property and the environment.

Changes in navigation services and how these services are provided have always been a parallel process matching advances in ship borne technology with advances in AtoN themselves. Increasingly the differentiation between AtoN, VTMS and shipborne equipment and services is reducing and the opportunities for integration of services and systems is increasing.
Irish Lights and its partner GLA recently published ‘2030 – Navigating the Future’ which is the Tri GLA Aids to Navigation Strategy to 2030. It is recommended that this strategy be referenced in the DTTAS strategy.

In addition to its core AtoN provision there is potential for Irish Lights to contribute directly to the safety of vessels at sea and particularly smaller vessels in the fishing and leisure sectors through its data and coastal networks. The data network is already providing live weather data (wind, sea state, sea temperature) on AIS, Social Media and the internet from 12 coastal stations. A recent survey of mariners identified the potential for increased provision of such data as a safety service. There are opportunities for a significant safety impact through an integrated approach to the expansion of this type of service.

Given the convergence of maritime safety services it is recommended that the strategy make provision for closer working and exchange of information between the various state agencies involved and that consideration be given to a consultative forum to ensure consistency and best use of resources.

The DTTAS Maritime Safety Strategy 2015-2019 (MSS) will undoubtedly form a significant part of the overall DTTAS strategy. Irish Lights contributed to the MSS and identified a number of potential contributions to future activity. The MSS included provision for periodical Maritime Safety Conferences. Consideration should be in the overall strategy to further advancing this concept into a more formal consultative forum that would allow DTTAS to consult annually with a range of industry stakeholders.

Harnessing Our Ocean Wealth.
The HOOW Strategy published in July 2012 set Ireland on an ambitious path to maximise the contribution to our economy from our maritime resources. The proposed Integrated Marine plan has three high-level goals of, building a thriving maritime economy, securing healthy ecosystems and increasing our engagement with the sea. Progress has been made on all three goals and on the detailed supporting programmes. Irish Lights is playing a key role in supporting relevant aspects of the HOOW strategy and we recognise the importance of a consistent approach with the future DTTAS strategy in terms of providing a framework that facilitates the ready achievement of the relevant projects.

Emergency Planning and Security.
While a small and lean organisation in terms of manpower Irish Lights have significant coastal assets both in terms of property and communications networks. We also have important in house expertise in operating in the coastal and offshore environment. These resources could provide important support for emergency and security plans.
It is recommended that the strategy include a review of the maritime and coastal elements of national emergency plans to ensure that state resources are fully integrated in the planned responses. Irish Lights have been active participants in the DTTAS led MarSur Committee and recommend that the strategy include proposals for advancement of this work.

**Coastal Economy and Tourism Initiatives**

While safety of navigation and protection of the environment are central to our operations Irish Lights is very cognisant of its coastal and maritime heritage and its potential to contribute to tourism both nationally and locally where we have significant infrastructure and close links with coastal communities. The integration of Tourism and Transport in a single Department provides a valuable opportunity for marine tourism development.

The existing strategy commits to continued growth of the economic contribution of tourism, increasing employment in the tourism sector and the capacity of rural communities to capitalise on tourism opportunities by supporting tourism development innovation and sustainability. Irish Lights would strongly support this approach and through our North-South all island brand partnership ‘Great Lighthouses of Ireland’, and otherwise contribute to this vision.

The Great Lighthouses of Ireland initiative has already contributed in a significant way to the Wild Atlantic Way and Causeway Coast / Gobbins Walk coastal tourism initiatives. When viewed collectively as a coastal touring brand, lighthouse sites offer an attractive variety of 22 activities to visitors - including 6 exhibitions, 7 guided tours of lighthouse towers, 5 event venues, 5 food & drink outlets, 2 centres with guided walking and 1 offering a boat tour. There is scope for further development of activities, especially exhibitions, food & drink, tower tours, guided walking and boat tours to lighthouses on islands. This has helped to maintain an important coastal tourism asset with a collective property value of circa €16 million: attracting circa 200,000 visitors per annum, selling 6,000 bed nights, creating 50 direct jobs and sustaining an estimated 75 indirect jobs in relatively remote coastal regions (all jobs are full time equivalents).

There are equally good opportunities for a more formal contribution to the Ireland’s Ancient East initiative through integration of the Lighthouse story which parallels many of the key historical developments. Further opportunities will emerge in other coastal regions and in Northern Ireland.

**Technology.**

The Programme for Government and the Public Services Reform Plan highlight information and Communications Technologies (ICT) as key enablers to delivering improved public services. The strategy notes that the Department will ensure that both it and the sectorial bodies under its responsibility will deliver more efficient organisational structures, enhanced business processes and pursue opportunities for shared services.
As a technology-based organisation, Irish Lights welcome the recognition of ICT as a key enabler to delivering improved services. More than most organisations, we are influenced by advances in digital communications and we also play an active part in driving forward and shaping those advances within the operational context of modern navigation. Similar to our sister state services, we are using ICT to streamline our business and administrative processes as technology allows, but we are also conscious of the potentially transformational effect automation is having on all forms of transport, including vessels, and how advances in this area will redefine our customer requirements.

Automation and high-quality satellite services at sea have the potential to reduce the requirement of visual AtoN but it is clear that the demand for greater capacity and highly reliable offshore connectivity will increase as the need for real-time and predictive environmental data becomes a key factor of ensuring safe voyages.

The IMO e-Navigation project is beginning to gather pace and we cannot, nor would we wish to, passively wait for others to define our services. Accordingly, we would request that the Department’s Strategy document gives more recognition to changes in navigation and places emphasis on the State’s engagement with e-Navigation.

Irish Lights have recently completed the Dublin Bay Digital Diamond project which brought together stakeholders from across the maritime sector to consider the potential for future integrated e-Navigation services in the sector and test emerging technologies. The project successfully considered a range of data services and there is undoubtedly potential for a follow-on national project to consider an integrated Irish Maritime Service Portfolio or a set of such portfolios. The potential for such services which would be jointly provided by state and private sector organisations should be included in the strategy.

The DTTAS SafeSeasIreland (SSI) Project has been a particular success and has proven the potential for centralised online reporting in the sector. The strategy should include an examination of the potential for further ambitious developments in this area. Irish Lights have significant infrastructure and expertise in the communications area and would be willing to support any development of this nature.

While communications are not directly within the remit of DTTAS, the issue of providing efficient communications services, including broadband, on the coastal periphery has significant importance for coastal communities, tourism, and the maritime sector as a whole. Irish Lights have previously made a submission to the National Broadband Plan on this issue and recommend that specific attention be paid to the matter in the DTTAS strategy.

**Integration with Government Policy.**
Eventually e-Navigation will revolutionise how goods and people are transported around the island of Ireland (and the world). Similarly, the introduction of Marine Spatial Planning will define how our offshore resources can be exploited sustainably.
We believe the future of sustainable offshore development will be largely shaped by the implementation of an effective National Overarching Marine Spatial Plan (MSP) and following on from that a system of regional and local MSPs. It is the early stages of the MSP implementation with the EU regulations only been transposed into Irish Law in August of 2016. However the ongoing and close collaboration between the Department and the Department of Environment, Community and Local Government is an important component of MSP implementation.

From Irish Lights perspective we want to ensure that any threat to navigational safety or efficient movement of vessels is mitigated through competent and experienced analysis during all stages of the MSP process. Irish Lights is available to provide our experience and competence in navigational and marine transport matters to work with the DECLG Marine Spatial Planning Team in shaping the national Plan.

We would suggest that the importance and status of MSP is understated in the present strategy and would recommend that it be given more prominence in the period ahead.

Closely linked to MSP is activity in the foreshore area. While Foreshore is largely dealt with under the Department of Agriculture, Food and Marine (DAFM) it is important that activity, and particularly safety of navigation assessments, be coordinated across Departments and agencies. Irish Lights have previously provided consultation on the Foreshore and Marine Area Development Bill supporting a more streamlined risk assessment and consent process. Irish Lights have statutory responsibility for the granting of consent for Aids to Navigation associated with foreshore activity (including aquaculture). AtoN consent inevitably includes a navigation risk assessment. Irish Lights are statutory consultees for foreshore activity and are also frequently consulted by developers undertaking EIS and other assessments. The DTTAS Strategy should include consideration of the benefits of further integration of the Foreshore Lease/Licensing regime along the lines set out in the 2013 proposals.

Cross Cutting/Integration.
Irish Lights recognise the Departments desire that cross-cutting strategies can only be achieved through highly focused coordination and cooperation across the functional units of the Department itself, with the state agencies under its remit and with other Departments and key stakeholders.

We believe this strategy to be of great significance both nationally, within the context of Northern Ireland and internationally. Irish Lights already have a number of active MOUs, SLAs and agreements with agencies within Ireland and the UK. These include: IRCG; CER; SEAI; Comreg; Met Éireann; MCA and Ofcom. In addition Irish Lights work closely with a range of Irish and UK State Agencies and are in the process of developing additional SLA and MOU. We believe the DTTAS strategy should encourage and if necessary proactively promote and facilitate integration across the state agencies.