

These areas should be considered to be owned by the wildlife that inhabits them and any efforts to enter or make changes to these areas should only be allowed with the permission of the government and with the best interest of the species that inhabit them in mind. People wishing to enjoy these areas in harmony with nature should be allowed to do so with the understanding that they are guests in an area of special value and should only be there if they are willing to adhere to strict guidelines of protection set out by the state. No flash photography, loud music or destructive behaviour of any kind should be permitted.

4. There should be nationwide advertising campaigns to show our impact on biodiversity to the public and raise awareness of this issue. For example, 'This is what a native forest should like', *show picture of native forest*, 'This is what it looks like now', *show monoculture, devoid of life, pastureland*, go to www.whatever.ie to find out more and to find out how you can make a difference. Another example, 'This is the nightjar, it is now extinct' - go to www.whatever to see how you can make a difference.
5. There must be better education in our schools about the importance of biodiversity loss and climate change. It should be treated as a subject similar to SPHE or etc., and should receive a set period of time each week. Schools should carry out projects involving students to address these issues.
6. There must be better education and engagement of our politicians in these issues. Politicians and TDs should have to watch and be involved in a mandatory online course about biodiversity and climate change before being allowed to run for election or local election etc.
7. The betterment of these issues should be measured by wildlife value and impact and not by any economic successes, i.e., they should not be measured by increase in tourism or any profit-based approach. People should not be trying to profit off this as a means of primary engagement with the issue. This is an issue outside of the realms of profits and economic growth and should be treated as such. I understand that this is an issue with our societal attitudes as a whole but I believe if even this small area of our society could be measured by value produced as opposed to profit produced, it would benefit our efforts greatly.
8. There should be greater funding, grants and advertisement for local community groups tackling these issues and mandatory forums between local politicians and community environmental groups should run monthly.

9. We must create large marine protected zones in our seas and end industrial fishing and bottom trawling. There should be strict legislation and fines governing any discrepancies in relation to this and all existing fishing vessels should have to re-register for fishing licenses under the new regime and meet specific standards before being allowed to do so.
10. We need to protect our peatlands against overgrazing by free-ranging sheep and other animals and create systems of farming that make sense for the areas they're in. We need to work towards reversing the incentives that are currently causing this and implement strict fines for any free-ranging sheep and other farm animals.
11. The destruction and open-mining of our beautiful peatlands must stop immediately and without exception.
12. There must be widespread removal of invasive and non-native species in our hedgerows, parks and wildlife areas and the immediate cessation of planting of these species. This could be done through both legislation and the support of community groups to carry out the necessary measures to remove these species. There should be fines and high taxes for the planting of non-native and invasive species both on a large scale and in our gardens and garden centres.
13. Efforts must be made to address the damage being caused by invasive and non-native animal species such as Sika Deer which are preventing the regeneration of our forestland.
14. More strict laws on intensive agriculture and pesticide usage and incentives, schemes and grants for organic farming and the purchase and resale of Irish provenance goods, more community gardens for growing of our own food.
15. We should sign-up to protect 30% of both land and sea by 2030 as other EU countries have and make visible and actionable steps towards achieving this with strict consequences for government officials who go against these plans.
16. We need the legislation to protect wildlife areas properly - it is not enough to simply say they are protected - the work needs to be done to make this a reality.
17. We must reduce the size of the Dairy and Beef Herd while maintaining compassion and empathy for farmers and their livelihoods. The callous money grabbing and supposed need for "expansion" touted by our ministers and those representing the meat and dairy industry in Ireland comes at the great expense of our wildlife and this must stop. There is no more "room for expansion". We must heed the warnings that nature

has given us and reduce the destructive impact that beef and dairy farming is having on our landscape.

18. Lastly, we must recognise the importance of hedgerows and give them the space and reverence they deserve.

I would like to take this opportunity to sincerely thank the NBAP Consultation Team for taking the time to read my submission and I hope my suggestions will be of help in addressing these issues.

Kind regards,

A solid black rectangular box used to redact the signature of the sender.



Dublin Friends of the Earth
c/o Friends of the Earth Ireland
9 Mount Street Upper
Dublin 2

dublin@foe.ie

5 Nov 2022

Re: Public Consultation on Ireland's 4th National Biodiversity Action Plan

National Parks & Wildlife Service,
Department of Housing, Local Government & Heritage.
90 North King Street,
Dublin 7

Dear Sir/Madam

Dublin Friends of the Earth (DFoE) is an active group of volunteers who work together to address urgent environmental issues in Dublin, Ireland and globally. We are the volunteering arm of Friends of the Earth Ireland, and focus on general climate action issues as well as pursuing environmentally related projects as the need arises.

We are delighted to have the opportunity to put in suggestions for your consideration on the 4th National Biodiversity Action Plan.

We have split our suggestions into 2 parts:

- A. Key points we would like to have considered
- B. Further specific points on particular actions in the draft Action Plan

Key points we would like to have considered.

Where possible we have referenced these against actions in the draft Action Plan for ease of reading.

Stronger legislation, governance and enforcement

We believe this is a critical area. Without the relevant legislation and enforcement the plan will not succeed in its objectives. This is wide ranging, from adequate funding, staffing, and education of staff needed to enforce the laws, through to sufficient penalties and fast-tracking through courts for those breaking environmental laws, through to further public education and awareness of why the laws are so important.

Our asks are therefore as follows:

1. A Biodiversity Act that would put our National Biodiversity Action Plan on a legal footing, just like our Climate Act. (1B1 but looking for stronger commitment)
2. Strengthening the independent Biodiversity Forum; so that (just like the Climate Change Advisory Council) this helps to hold the government to account for our climate commitments. (ME5)
3. Changing our Constitution to provide for the Rights of Nature, and to include the protection of native biodiversity.
4. Banning through legislation the sale of invasive plant species e.g. in garden centres (2G mentions but not clear how this will be enacted or enforced)
5. Protection of native forests and ecologically sensitive plantation forestry through legislation and sufficient enforcement
6. Hedge cutting bans with strong enforcement during bird nesting season (slight mention in 2B1 but needs far stronger actions)
7. Scaled up enforcement of turf cutting bans and further financial help to wean people away from cutting and selling turf - as these are wonderful carbon sinks
8. Suitable, additional, funding and legislative powers for a wildlife crime unit

Scaling up ambition and funding to make a real difference (not just a token effort)

There are lots of very welcome actions in the draft Action Plan, but many we feel do not grasp the urgent need for action at scale. Our asks are therefore:

9. Committing to protecting 30% of land by 2030 as part of the 'Global Deal for Nature' which is due to be agreed in December 2022. E.g. Designated Conservation Areas should be more carefully monitored and protected such as Bull Island north Dublin. (2A1 but more detail and ambition needed)
10. Committing to protecting 30% of our seas, through the establishment and enforcement of Marine Protected Areas, as outlined by Fair Seas. (2F3 but more detail and ambition needed)
11. Enact the recommendations (the seven asks) from the Sustainable Water Network (SWAN), to protect and restore our rivers and riverbanks. More rigorous enforcement, larger fines, education etc. urgently needed (2C and 2E2 but very lacking in actual targets, how many rivers returned to "good" by when, how agriculture will be tackled to reduce harmful runoff into rivers at scale etc)
12. Funding large-scale rewilding initiatives and other connected landscapes through Environmental NGOs and removal of red-tape and other barriers.
13. An Taisce are paid for their compulsory advisory role, rather than having to fund from donations.
14. Reworking payments/incentives for farmers to support transition at scale to sustainable farming, with biodiversity given priority. Encourage local communities and farmers to grow more trees, more communication from Teagasc and other

recognised bodies to help with this. (2A6, 2B but lacking anywhere near the scale needed to make the impact needed by 2030)

15. Paid biodiversity officers (and support staff) installed in every council (1B4)
16. Large increase in funding support for the National Biodiversity Data Centre, broadening of their outreach and development of training programs (1B3 but lack of specifics especially in terms of increase funding and when)
17. Substantial increase in the scale of peat bog restoration projects (1D5, 2B6 but again needs much larger scale and support for ENGOS in this space, and not just on the lands owned by Bord na Mona)

(Re)connecting people and nature

18. Launching a broad and deep education campaign to reconnect us with the wonders of nature around us and to explain why the biodiversity crisis matters. This is adults too, not just children. (2F11, 3A but need more concrete actions)
19. Further promoting biodiversity education and citizen science, regular biodiversity walks in local parks and natural spaces, provide public transport to wild areas (1D4, 2F12, 5C)
20. Extensive funding and promotion of “pocket forests” in urban areas, bringing benefits to air quality, carbon sequestration, shade and connection to nature.

Further specific points on particular actions in the draft Action Plan

1A (and other parts) on sufficient capacity, resources, and monitoring progress

We are glad to see the intention to monitor success of the plan frequently, but would like to see something well funded and quite dynamic in monitoring the whole process - this could help to see more quickly what is working and what is not, so that something failing is not left in place until the 5th plan. If regular feedback on different parts of the plan could be given to everyone involved it would help with implementation overall. This group could also closely look at what is working elsewhere in the world on an ongoing basis. If there was flexibility like this the whole process could be more effective.

1B Local Authority Biodiversity Officers and Plans

We would urge the Action Plan to detail how it will help Local Authorities be more proactive in prioritising Biodiversity in terms of planning, re-zoning, coastal protection, hedgerow protection on council property and road sides, rewilding, reduced grass cutting, no pesticide use and extensive tree planting (all on council lands and grounds of public buildings).

1E Wildlife Legislation

The introduction of improved legislation by 2027 seems very slow, and also 2030 for enforcement improvements. This is an area needing far more urgent attention. We also need to give powers to (a very much increased number of) Rangers, not rely on the Gardai who understandably have many other priorities.

2B4 Pesticide reduction by 50% by 2030

Whilst we very much welcome this, again our ask would be to take actions that will achieve a far more aggressive target in terms of percentage and earlier than 2030. The impact on pollinators alone is horrifying and reducing the substantial impact of pesticides by 50% by 2030 will lead to further significant losses and potentially species extinction in the meantime

Objective 3 secure nature's contribution to people

In general actions feel a bit light on detail in this section. Need to see actions around for example creation of Pocket Forests, green roofs, and other biodiversity favourable environments in urban areas. Much improved public transport access to forests, also.

3C and how businesses can help

Has the area of tax incentives been explored alongside grants? This might suit some businesses better and create further action at scale (providing of course the tax incentives had strict rules to ensure the correct actions are taken in the right locations).

Objective 4 Embed Biodiversity at the heart of climate action

Specifics needed about how will interests in say offshore wind energy generation be weighed up against biodiversity considerations?

Objective 5 - Enhance the evidence base for action on Biodiversity

Whilst we are very happy to see the actions detailed, they require significant funding increases for the likes of the National Biodiversity Data Centre which is not mentioned. Similarly expansion of citizen science is extremely welcome but how will this be supported financially and structurally?


Objective 6 - Strengthen Ireland's contribution to international Biodiversity initiatives

This section feels very light on specific targets. It also has quite a few references to All-Ireland initiatives (to be welcomed) but very few on partnership with European initiatives.

Many European countries are a long way ahead of Ireland in areas such as rewilding and reintroduction programmes, such as the Life Lynx project. Carefully planned reintroduction of Lynx in Ireland for example would have a massive positive impact on biodiversity in reducing deer numbers, allowing woodlands to naturally regenerate etc., and would pose no threat to human wellbeing. The ambition here needs to be greatly scaled up.

A huge thank you for your time and consideration. To repeat, there are a lot of very positive actions in the draft Action Plan which we very welcome - we just feel there are areas that need greater scale, urgency, and the funding/legislation to back all this up.

Kind regards

 (on behalf of Steering Committee)

Dublin Friends of the Earth

Biodiversity Action Plan



Foreword

The National Biodiversity Action Plan (NBAP) runs from 2017 to 2021 and captures the objectives, targets and actions for biodiversity to be undertaken by a wide range of government, civil society and private sectors to achieve Ireland's Vision for Biodiversity. Introduced the topic and was launched by Minister Heather Humphreys in October 2017,

It promotes the importance of the wide range of ecosystems, habitats and species to society as a whole through the concepts of natural accounting and an increased recognition of the value of ecosystem services. A biodiversity action plan (BAP) is an internationally recognized program addressing threatened species and habitats and is designed to protect and restore biological systems. The original impetus for these plans derives from the 1992 Convention on Biological Diversity (CBD).

Introduction

The NBAP for 2017-2021 demonstrates Ireland's continuing commitment to meeting and acting on its obligations to protect our biodiversity for the benefit of future generations through a series of targeted strategies and actions.

Minister Heather Humphreys launched Ireland's 3rd National Biodiversity Action Plan, in October 2017, for the period 2017-2021.

The plan sets out actions through which a range of government, civil and private sectors will undertake to achieve Ireland's 'Vision for Biodiversity', and follows on from the work of the first and second National Biodiversity Action Plans.

119 targeted actions are contained in the plan, underpinned by seven strategic objectives. The objectives lay out a clear framework for Ireland's national approach to biodiversity, ensuring that efforts and achievements of the past are built upon, while looking ahead to what can be achieved over the next five years and beyond.

Previous Plans

- An interim review of implementation of the second Plan was completed in December 2014 and published in January 2015.
- A public consultation was held on this new third plan from December 2016 to February 2017.
- Ireland's first National Biodiversity Plan was launched in April 2002.

- An Interim Review of the National Biodiversity Plan was launched in November 2005. This review outlines the level of progress made in implementing the first National Biodiversity Plan and identified the areas where further efforts were required. Much of Ireland's National Biodiversity Plan is legislated for by the Wildlife Act, 1976, as amended by the Wildlife (Amendment) Act, 2000.

Ireland's Vision for Biodiversity is: “That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally.”

Analysis

Biodiversity underpins our economy, health and well-being by providing us with clean air, water, food, materials, medicines and healthy functioning ecosystems amongst other things. This stock of 'natural capital' provides us with important 'ecosystem services'

The Coordinator of the IEN said that Biodiversity is essential for sustaining the ecosystems that provide us with food, clean water, health, wealth, and other services we take for granted in our everyday life

Economists have tried to put a monetary value on biodiversity: Ireland's biodiversity contributes €2.6 billion each year to the Irish economy through ecosystem services.

Food production relies on biodiversity for a variety of food plants, pollination, pest control, nutrient provision, genetic diversity, and disease prevention and control. Both medicinal plants and manufactured pharmaceuticals rely on biodiversity.

The Wildlife Act, 1976, is the principal national legislation providing for the protection of wildlife and the control of some activities that may adversely affect wildlife. While the European Communities (Birds and Natural Habitats) Regulations 2011-2021 is also very important legislation.

The Wildlife Acts 1976 to 2021 is a collective citation for the following:

Wildlife Act 1976

Wildlife (Amendment) Act 2000

Wildlife (Amendment) Act 2010

Wildlife (Amendment) Act 2012

Heritage Act 2018

Planning, Heritage and Broadcasting (Amendment) Act 2021

The Wildlife Act, 1976 provided a good legislative base for nature conservation. The species protection provisions, including those regulating hunting, are quite comprehensive, to the extent, for example, that they largely foresaw similar aspects of the EU Birds and Habitats Directives. However, the habitat/site protection measures in the 1976 Act were relatively weak, and were almost completely limited to measures which could be introduced in agreement with landowners. There was very limited power to ensure protection, even in the case of outstanding habitats or sites, where agreement of landowners was not forthcoming. Nature conservation legislation was substantially enlarged and improved by the Wildlife (Amendment) Act, 2000 and the Birds and Natural Habitats Regulations.

There are five main drivers of biodiversity loss in Ireland, namely, intensive agricultural and forestry practices, overfishing, invasive species, changes in land use and the over-exploitation of resources such as peatland. The most significant past and present pressures are clearing and fragmentation of native ecosystems, invasive species and pathogens, inappropriate fire regimes, grazing pressure and changed hydrology.

Biodiversity on our planet, has been declining at an alarming rate in recent years, mainly due to human activities, such as land use changes, pollution and climate change. 22 species were declared extinct (or nearly so) in 2019, although the total number of species lost this year probably numbers in the thousands. Scientists typically wait years or even decades before declaring a species well and truly extinct, and even then only after conducting extensive searches.

- Splendid Poison Frog. [Extinction date: 2020]
- Spix's Macaw. [Extinction date 2021]
- Northern White Rhinoceros. [Extinction date: 2018]
- Baiji. [Extinction date: 2017]
- Pyrenean Ibex. [Extinction date: 2000].

Ireland has also suffered huge losses, the most recent assessment of the status of EU protected habitats and species in Ireland in 2013 showed that 91% of the 58 habitats assessed have unfavourable conservation status, as a result several breeding bird species are lost or on the brink; Corn Bunting, Nightjar, Corncrake, Curlew and Hen Harrier, the Natterjack Toad and Red Squirrel are also under threat

18% of the native Irish butterfly fauna is under threat of extinction. A further 15% is near threatened. The results show that one species is extinct (Mountain Ringlet), six species are threatened (Endangered or Vulnerable) and 5 species are near threatened. This situation is due to population declines and range reductions caused in the main by decline in habitat quality. 4 of the 24 species of resident Damselfly and Dragonfly are assessed as threatened, and one species as near threatened. 3 of the threatened species are found in low nutrient status wetlands and the nutrient enrichment of these habitats is regarded as the primary threat to them.

So the state of Ireland's biodiversity at time of the publication the 3rd NBAP was very unhealthy

Principal Issues and Evaluation

There is a broad range of organisations involved in biodiversity conservation, from central Government Departments, State agencies and Local Authorities, to the research community, national and local NGOs, and local communities and individuals.

- Minister for Culture, Heritage and the Gaeltacht is responsible for biodiversity, the enforcement of wildlife legislation, designation and protection of Natura 2000 sites
- The Department of Housing, Planning and Local Government and the Department of Communications, Climate Action and Environment have responsibility for environmental issues such as planning and development, water quality, renewable energy, and climate change.
- The Department of Agriculture, Food and the Marine is responsible for policies and funding programmes in the areas of agriculture, food, fisheries, forestry, and rural environment.
- A number of other Departments have responsibility for, or involvement in, issues that crossover with biodiversity concerns, e.g. An Garda Síochána and Customs are involved in enforcement of certain key legislation in the area of illegal trade and importation. State bodies with a role in biodiversity conservation include the Environmental Protection Agency, Marine Institute, Inland Fisheries Ireland, Teagasc, the Heritage Council Waterways Ireland, Coillte, and the Office of Public Works

Local Authorities play a key role in biodiversity conservation through the planning system, the wide range of environmental services they provide, the network of biodiversity and heritage officers and the Local Authority Water and Communities Office and their implementation of plans and programmes. Landowners, farmers, and local communities are in many aspects the most important players in biodiversity issues. A wide range of national NGOs are involved in the area of biodiversity including An Taisce, Birdwatch Ireland, the Irish Whale and Dolphin Group, Bat Conservation Ireland, the Irish Peatland Conservation Council, and the Irish Wildlife Trust.

Funding for biodiversity is allocated from different sources and in various ways. Dedicated funding for biodiversity is provided under the annual Exchequer allocation to relevant Government Departments. State bodies with a biodiversity role also receive Exchequer funding or grants. Local Authorities avail of financial support from State bodies such as the Heritage Council for biodiversity-related projects and the Heritage Officer and Biodiversity Officer programmes. Funding for biodiversity research is delivered via a number of organisations including the EPA, Marine Institute and NPWS (National Parks and Wildlife Service). The EU funds scientific research, currently through the Horizon 2020 programme.

The Department of Culture, Heritage and the Gaeltacht (DCHG) is the official body responsible for oversight of the implementation of this Plan and for coordinating the other Public Authorities, eNGOs and private sector organisations involved in the process

The Biodiversity Forum represents various economic sectors, NGOs, academics other relevant stakeholders. The Forum will monitor the implementation of the Plan and advise the Minister accordingly.

Objectives

1. Mainstream biodiversity into decision-making across all sectors
2. Strengthen the knowledge base for conservation, management and sustainable use of biodiversity
3. Increase awareness and appreciation of biodiversity and ecosystems services
4. Conserve and restore biodiversity and ecosystem services in the wider countryside
5. Conserve and restore biodiversity and ecosystem services in the marine environment
6. Expand and improve management of protected areas and species
7. Strengthen international governance for biodiversity and ecosystem services

There are 119 targeted actions contained in the NBAP underpinned by these 7 strategic objectives

While all the objectives are important I feel that Increased awareness and appreciation of biodiversity and ecosystems services and to conserve and restore biodiversity and ecosystem services in the wider countryside are the most important , education is key to everything and getting information to landowners, farmers and the public is vital for protecting our habitats and the species within them.

However some of the actions are not detailed enough or give enough clarity and so perhaps unachievable or practical.

Examples

“ACTION 1.1.4. Strengthen ecological expertise in local authorities and relevant Government Departments and agencies.....” it doesn’t specify what expertise is needed or required, where these so called experts may be trained or how they fit into an agency; if found, how would we get Corn Bunting experts to attempt to bring the species back as a breeding part of Irelands fauna.....?

“ACTION 2.1.7. Support and encourage the volunteer network and local communities to carry out biological recording and other citizen science projects.....” this only works as a labour of love and volunteer level, in some areas and depending on population density there may only be a handful to cover the terrain and the same individuals carrying out the same survey annually with little or no recognition or payment, a huge education drive must be started in schools to get young people involved and interested in our/their biodiversity

“ACTION 4.1.9. Implement “Deer Management Strategy in Ireland - A Framework for Action”.....continuing to talk about the Deer problem will not solve the Deer problem in Killarney National Park

While there appears to be a timeframe, (although in some areas its rather vague “2015-2020” and surely too prolonged) for each action and a clear statement of who is responsible there is no indication of priority for certain actions which is not good policy, it’s also apparent that a lot of the actions fall at the feet of Local Authorities who maybe already overburdened with motor tax, driving license, housing, road works and waste disposal issues.

In December 2017 a leading environmental lobby group said the Government's new biodiversity action plan "lacks aspiration, focus and strategy", the group known as Environmental Pillar, which represents a coalition of 26 environmental organisations in Ireland, criticised the Government for a lack of engagement on the document, saying the views and suggestions of outside parties had not been listened to and said the plan falls short of what is required to halt biodiversity loss over the coming years.

To date the Plan appears to be unsuccessful and those words in 2017 now appear to have been a true statement of events to come.

The biggest transgressor of environmental law in Ireland is the State. Non-compliance is rife at all levels of society, from Government non-compliance with EU laws down to local wildlife crime by individuals.

In February 2021 the National Biodiversity Forum released a report auditing the progress made on in the National Biodiversity Action Plan 2017-2021.

A review of the implementation of the current Biodiversity Action Plan 2017-2021 shows that limited progress has been achieved in actions to stop the decline of biodiversity in Ireland. The environmental indicators still show a very disturbing picture of losses and declining trends. Two-thirds of wild bird species are red or amber listed birds of conservation concern, one third of wild bee species are threatened with extinction and 85% of internationally important habitats are 'unfavourable' limiting the benefits that people can also derive from them such as carbon sequestration.

There are however some successful projects, Corncrake habitats have been restored largely by interested individuals or groups though admittedly assisted by the Corncrake LIFE project ; A €5.9m EU-funded project overseen by the Department of Housing, Local Government and Heritage The project aims to revive the fortunes of the Corncrake and ensure it remains a part of rural landscapes for years to come and the project team will operate at coastal and island locations in Donegal, Mayo and Galway as well as associated farmland. Over a five-year period, Corncrake LIFE will work collaboratively with farmers and landowners to improve the landscape for the highly endangered bird. Measures will includes creating and maintaining areas of

early and late cover, wildlife friendly mowing of grass, and provision of refuge areas during meadow harvesting and incentivising later cutting dates. By the end of the five year project, the aim is to deliver a 20% increase on the 2018 population of Corncrake recorded in Ireland.

Overall the NBAP has not been effective in halting biodiversity loss, several species of bird have been lost as breeding species, Corn Bunting and Nightjar while Curlew, Twite and Yellowhammer are on the brink, several species of Butterfly are also in peril, Ireland's record on protecting Marsh Fritillary is very poor and has only given specific legal protection to the endangered butterfly's habitat on 16 sites.

When Packie Bonner saved that penalty in Italia '92 there were more than 5000 breeding pairs of Curlew in Ireland, today there are fewer than 130.....! For many Irish environmentalists the Curlews plight is emblematic of the destruction done to our biodiversity over the past half century

The Marsh Fritillary butterfly is protected under the Berne Convention and the European Union Habitats' Directive 1992. All species listed on Annex II of the Habitats' Directive are protected, and EU member states must designate core areas of habitat for the species on Annex II, such as the Marsh Fritillary. These sites must be managed in accordance with the ecological needs of the species. Ireland has provided sixteen designated sites. But the butterfly is extinct on some of them. On some of the sites, breeding is sporadic and the butterfly is frequently absent from the site. The Marsh Fritillary has been absent from Killarney National Park since the early 1990s. The butterfly disappeared from Ballynafagh Lake, County Kildare in the late 1990s. On these sites, part of the breeding area overgrew with rank grasses and woodland shaded out the remaining habitat.

At present, Ireland offers little more than paper protection for its designated areas. While designation provides some protection from direct threats such as inappropriate land use or development, protected areas are supposed to be the national jewels in the crown of our land and marine areas, but they are inadequately managed and in poor condition, with few exceptions.

Challenges

The need for coordinated national environmental policy is clear: the latest State of Ireland's Environment report from the EPA called for “a single overarching policy position - a vision to protect Ireland's environment into the future”.

The taxpayer is not getting value for money on biodiversity policy due to a chronic lack of coordination – and sometimes outright conflict – between the NBAP and other national policies. At a minimum, all departments must ensure their policies are consistent with and/or, promote the aims of the NBAP. Farm payments are a good example of the lack of coordination in environmental policy. Certain landscape features and semi-natural areas are currently ineligible for farm payments but some of these areas are Natura 2000 sites and therefore extremely important for biodiversity. Farmers should be rewarded for managing these areas. Furthermore, semi-natural habitats on farmland (currently considered “unproductive” areas) should be eligible for payments.

The Government must also significantly improve training of agricultural advisors and farmers to recognise and maintain biodiversity on farmland. There are some positive results-based agri-environment projects, like the EIPs, but these are small in scale and need to be scaled up and rolled out nationwide for enhanced impact.

Furthermore, commercial semi-states such as Coillte and Bord na Móna still have economic dividend obligations. The Government should mandate non-economic biodiversity dividends which enable greater public health and wellbeing benefits, carbon sequestration and flood mitigation as well as biodiversity benefits from public lands, for example through a strong biodiversity duty for semi-states.

The Biodiversity Working Group comprises Departments, Agencies and other bodies that have a role in implementing the Plan. But the policies of these organisations do not consistently mainstream biodiversity and fail to align with the aims of international policies such as the EU Green Deal, EU Biodiversity Strategy, SDGs, NFRD, EU Sustainable Finance Action Plan, UN Decade of Restoration and others. European funds such as EMFF, CFP, & CAP do not currently deliver meaningful positive outcomes for biodiversity and with some €500 million per annum likely to be spent in the coming years between the next CAP Pillar 1 eco-scheme payments and Ireland's commitments to agri-environment schemes under Pillar 2, there is huge potential for meaningful change.

Ireland is NOT spending enough on protecting our under-threat biodiversity – and the majority of what we are spending is going on schemes that are failing to have an impact. The natural world remains significantly impacted by the human hand through habitat loss, degradation, overexploitation, pollution, and climate change.

So what is the State doing to ensure funding and resources are in place to turn the tide on biodiversity loss here in a meaningful way?

Ireland is spending well below internationally-accepted levels on biodiversity protection.

The vast majority of spending goes to agri-environmental schemes that experts, the State and the EU Court of Auditors have all said are failing to tackle biodiversity loss. Experts behind a ground-breaking 2020 study of biodiversity financing in Ireland are concerned that the key agencies charged with biodiversity protection are under-funded and under-staffed to fulfil their remits.

Natural capital accounting is still not mainstreamed across government making it difficult to account for ecosystem services from our natural resources.

Since the late-2000s, international organisations and researchers have identified inadequate finance as a major reason for the failure to halt the decline in biodiversity. Globally, it is estimated that between €78 and 91 billion is spent on biodiversity finance every year. At face value, this appears to be an exorbitant amount of money. Yet, a look at the spending on supports which are potentially harmful to biodiversity – estimated by the OECD at €500 billion per year – puts this figure into perspective. This global trend is seen in Ireland too. Since the Central Statistics Office (CSO) started closely tracking environmental supports in 2010, €8 billion has been paid out on those measures, compared to over €20.5 billion in fossil fuel subsidies, much of which goes to sectors that are known to have negative environmental impacts.

A review of global biodiversity financing by the OECD last year found that there are also significant gaps in information on biodiversity spending, warning that up-to-date and accurate estimates are needed to establish a baseline from which governments and other stakeholders can track biodiversity finance trends over time.

Prior to 2010, there was no obligation on governments to monitor biodiversity-related expenditure so, to bridge this gap, the UN introduced a new requirement that all parties to the UN Convention on Biological Diversity (CBD) report on biodiversity expenditure.

In the front line and faced with a complex and challenging workload, Conservation Rangers are mostly graduates and many have post graduate degrees. Yet they are amongst the lowest paid professional/technical staff in the Civil Service

The Biodiversity Finance Ireland project is one such project addressing the challenge of biodiversity finance, specifically in an Irish context. Based in the Planning and Environmental Policy Research Unit of University College Dublin and funded by the Irish Research Council and the National Parks and Wildlife Service, this project adopts an existing United Nations Development Programme (UNDP) BIOFIN model to harness the knowledge and experience of the developing world in coping with the acute pressures of climate change and biodiversity loss. In total, 31 developing nations have already developed their own biodiversity finance model. These previous BIOFIN assessments benefit from a growing suite of financial mechanisms to fund existing and novel conservation initiatives, or through the mainstreaming of biodiversity concerns into broader policy and institutional discourse.

The aim of Biodiversity Finance Ireland is to:

1. Characterise the gap between current resources and those needed to conserve biodiversity
2. Identify potential synergies and co-benefits in meeting biodiversity and climate targets.
3. Highlight harmful subsidies that threaten these across various sectors.

Biodiversity policies promote the protection, conservation, and sustainable use of biologically diverse ecosystems and habitats. In doing so, they create significant public benefits and contribute to social well-being. But because of a lack of application of legislation no person is prosecuted if hedgerows are cut out of season, if Gorse is burnt during the summer months on the hill sides, when a raptor is shot orl poisoned.

All these crimes must be enforced to show that biodiversity is vital and that individuals or groups will be prosecuted if found committing such acts. There is no point including the legislation in the Plan if it's not enforced but locating these criminals and proving they are guilty is, as history shows, never easy.

There are numerous examples by various bodies, the State and individuals committing wildlife crime-cutting hedgerows outside the permitted cutting season, burning Gorse etc. on hill sides, persecution and killing of Raptors and other species.

Wildlife Crime can be described as any the harming, taking, trading, possessing, obtaining, or consumption of wild flora and fauna.

- The biggest transgressor of environmental law in Ireland is the State. Non-compliance is rife at all levels of society, from Government non-compliance with EU laws down to local wildlife crime by individuals.
- Badger baiting is illegal in the Republic of Ireland, and it is illegal to interfere with a badger sett. Baiting is quite widespread here especially across Northern Ireland, with thousands of badgers being killed this way every year.
- On 09 March in Dungarvan District Court the National Parks and Wildlife Service (NPWS) secured successful convictions in a high-profile wildlife crime case. The court convicted four felons of crimes relating to targeting and killing of protected birds of prey during the 2014 breeding season. The case began more than two years ago, in March 2014, when NPWS conservation rangers monitoring Peregrine Falcon nests in the area detected suspicious activity at three quarries. During subsequent investigations the NPWS discovered four dead peregrine falcons and two dead Sparrowhawks, as well as numerous "bait" birds.
- Recently in May 2022 in Folkestone (UK) Late Spider Orchids and Burnt Tip Orchids were stolen from a well-known site, this type of crime is in my opinion commonplace in Ireland by both ignorant people and the well-educated but there is no enforcement of the law and probably the local Gardaí would only snigger and laugh if a complaint of this nature was made against someone.

At present the NPWS is not in a fit condition to fight wildlife crime by private individuals

There has been some positive work on wildlife crime. For example, in 2018, the National Parks & Wildlife Service established an internal Wildlife Crime Group and a Wildlife Crime workshop and conference was organised. The NBG provided CITES training to staff and Zoo licensing inspectors are to provide a CITES and Bird of Prey training course to staff in the Department of Housing, Local Government and Heritage. There continues to be ongoing and more formalised interaction between NPWS and other Government Departments and An Garda Síochána in relation to wildlife crime and the Minister for Heritage recently committed to establishing a dedicated wildlife crime unit in the NPWS. The National Biodiversity Forum recommends continued monitoring of progress in wildlife crime detection and enforcement to determine if these measures are having an impact.

There is a lack of coordination between departments and policies

Example 1.

EPA Ireland has proposed that all of our rivers with large dams be designated as “high modified” meaning there would be no pressure to remove them but the Irish Wildlife Trust are not in favour of this

Example 2

Meath County Council recently allowed 1 of the country’s biggest meat processing companies to discharge commercial waste water in to the river Boyne, local campaigners expressed their dismay and horror.

In some areas there is a Tidy Town committee, local Government group and perhaps individual projects run by national organisations, a central database exists in theory through the Environmental Pillar leg of the PPN, but it’s probably a case of problems being so complex and overwhelming that small groups of volunteers don’t know how to be effective or how to make a start

Conclusion

Overall the NBAP is an interesting and worthwhile strategy however a lack of funding in some quarters, lack of enforcement and lack of information/education makes the plan difficult to implement and at times makes a mockery of the written word.

I feel the document as it stands is ineffective and needs to be re-written in such a way as to include only what is achievable and practical, it's a glossy document with over half of the content involving A4 colour photos of wildlife or habitats

In my opinion the NBAP is ineffective and does not provide the protection for Irelands, in action by the Government, Government bodies or responsible organisations; the lack of foresight by the Irish Wildbird Conservancy (IWC) now Birdwatch Ireland (BWI) to not purchase Akearagh Lough near Ballyheigue when offered for a paltry sum was scandalous when the site had known breeding Lapwing and Black headed Gulls, large concentrations of wintering wildfowl including Whooper Swan, the largest Gadwall count for Ireland and rare American waders not to forget its Orchids and insect life.

The purchase of offshore islands: Puffin Island where there appears to be no regular seabird survey, no population counts/ringing and no habitat management, is also rather strange and baffling

And as already mentioned the situation with our insects and in particular the Marsh Fritillary and the complete lack of data on some sites.

- The biggest challenge to implementing the NBAP is in my humble opinion EDUCATION.....!!!

The action plan drawn up is not practical, possible and full of too much red tape as to make it almost impossible to decipher and implement without a science degree and so becomes unreadable for the “man in the street” and for him to put it into practice. The plan looks like it was drawn up by men in white coats with too much legislation attached and very little of this implemented when wildlife crimes have been committed. Educating, farmers, landowners but more importantly school children on the rights and wrongs of biodiversity is key. A easy to read, simple fact sheet on biodiversity with additional sheets for different species and a separate easy to read book for the legal stuff would in my opinion make it easier for everyone to get our natural world back from the brink.

Recently during National Biodiversity week 2022, Teagasc were asked “what the main drivers of biodiversity loss are” the answer given by that member was

“.... That's a difficult question....”

Ireland currently lacks a coherent and broadly accepted vision for Irish forestry or at least a vision that's fit for purpose. The current predominate forestry model prioritises non-native conifer plantation, which is poor for biodiversity and is managed intensively using practices involving pesticides and clear felling.

If Ireland is to afforest 16,000 hectares a year it will mean moving land out of agricultural production, a practice I fear will not become a reality simply due to tradition, our reliance on the agriculture sector and poor education/ignorance

NBAPs are a necessary tool for the conservation of biodiversity but they must be made out in a clear, readable order with an easy to understand text and simple advice given to those who are willing to promote biodiversity on their land.

Wildlife must be enforced and funding must be provided where it is needed most

There are plenty of experts in this country with great ideas on-rewilding, habitat management, biodiversity loss, species rejuvenation, bird studies, pollinators, pollution, beneficial agriculture methods, permaculture, so why not get these people together and let them devise an effective, easy read style and practical plan for all before we are too late.

The Biodiversity forum gave the following 5 recommendations

1 Improve governance & stewardship of biodiversity

- Improve policy coordination
- Mainstream biodiversity into decision-making across all sectors
- Ensure accountability for the next National Biodiversity Action Plan and set SMART (Specific, Measurable, Achievable, Realistic & Timely) targets

2 Finance the Plan and prioritise actions

3 Protect, recover and renew biodiversity and ecosystems

- Protect Ireland's biodiversity by ensuring existing laws are enforced
- Ensure meaningful protections for habitats and species
- Accelerate action in marine areas

4 Build, connect and use the biodiversity knowledge base

- Improve monitoring and evaluation systems for biodiversity action
- Improve data accessibility
- Promote and facilitate interdisciplinary research
- Strengthen cross-border cooperation

5 Engage communities and the private sector

- Communicate the multiple benefits of biodiversity
- Boost community engagement & grassroots involvement
- Redouble efforts to engage the financial and business sectors

Most of these recommendations seem to be common sense so it's rather frustrating and strange why these were not part of the original Plan

The benefits of a successful NBAP is Ecological life support— biodiversity provides functioning ecosystems that supply oxygen, clean air and water, pollination of plants, pest control, wastewater treatment and many ecosystem services. Managing for biodiversity may also have wider ecosystem benefits e.g. in terms of preventing soil erosion, thereby affecting carbon storage and water quality, whilst enhancing landscape, habitat and species for tourism. Grants may also be available for creating or managing specific habitats or species

References

- National Biodiversity Action Plan
- The Wildlife Acts 1976 to 2021
- Heritage Act 2018
- Planning, Heritage and Broadcasting (Amendment) Act 2021
- The Biodiversity forum
- Barron Chris. [personal comments]
- Bat Conservation Ireland. Learn about Bats [on line guide]
- Carruthers Terry. Kerry, A Natural History
- Collins Bird Guide. Svennson, Mullarney & Zetterstrom
- Field Studies Council. Bats Guide [information leaflet]
- Killarney National Park Map

- McDermott Peter. [personal comments]
- The Natural History of Ireland W. Thompson
- Birds in Ireland .Clive D. Hutchinson
- Wild Ireland Eamon De Buitlear
- To The waters and the wild Gerrit van Gelderen

Consultation on Ireland's 4th National Biodiversity Action Plan
November 2022
submitted via email to NBAPConsultation@housing.gov.ie

Dear National Biodiversity Consultation Team,

The Green Party welcome the draft of Ireland's 4th National Biodiversity Action Plan. The conservation, protection and enhancement of our natural environment is of paramount importance to all life within Ireland. It is essential that the Biodiversity Action Plan is implemented in full and on time.

The six objectives of the Plan and the many Outcomes and Actions are welcome. We full support the proposal to adopt a whole of Government approach. For too long biodiversity has been side-lined and siloed in one government department. In order for the Action Plan to be realised, all government departments must take an active role in implementing it.

We have a few comments to make where we believe additional information and action is required:

We believe there needs to be clearer guidance on identifying sites of local ecological importance,

Ireland's 4th Biodiversity Action Plan should re-enforce the obligations on local authorities to identify sites of local ecological importance, and put in place resources and structures to ensure sites of local ecological importance are maintained and enhanced as much as possible. These spaces should span both urban and rural areas and include, but not be limited to:

Rivers	Heath
Ponds	Semi-natural grasslands
Streams	Marginal lands
Lakes	Semi-natural woodland
Wetlands	Small forests
Saltwater marshes	Small groups of trees
Freshwater swamp,	Fens and flushes
Freshwater marsh	Scrub
Bogs	Rocky outcrops
Hedgerows	Coastland

Local designations for nature conservation, biodiversity or amenity areas are not a new concept in Ireland, however they are not applied nationally in any co-ordinated way. Many local authorities either are unaware of their obligations to identify these local sites, or do not want to. A review of current development plans shows very few local authorities have a process in place to allow local sites to be given formal recognition in Development Plans and planning guidance is not clear on what additional protection or ongoing management is required for local sites of ecological importance.

The current guidance for local authorities on the development Local Biodiversity Action Plans dates to 2003¹, and provides limited information on how local authorities can and should identify and manage locally important ecological sites. More up to date guidance is provided from

¹ Reference: Heritage Council 2003 Guidelines for the Production of Local Biodiversity Action Plans, https://www.heritagecouncil.ie/content/files/guidelines_production_local_biodiversity_action_plans_draft_2003_546kb.pdf)

the Department of Housing, Local Government and Heritage in Section 9.24 of the 2022 Guidance² but it is unclear what process local authorities should undertake to apply such local designations of what protections would apply to any of these sites.

There is a huge opportunity in the Biodiversity Action Plan to clarify matters for local authorities, NGO's, Local elected representatives, and community groups in relation to locally important ecological sites including:

- Guidance on how locally important ecological sites can be identified,
- Guidance on how locally important ecological sites should be registered locally and nationally,
- Guidance on how to develop land identified as a locally important ecological site.

Our favoured approach is to allow Local Councillors, TDs, members of the Public Participation Network, community groups and the Council Biodiversity Officer or Heritage Officer to nominate locally important ecological sites. As with 'Protected Structures' sites could be identified at the Development Plan stage, through Local Area Plans or through a motion of the County Council. The Issues Paper that commences the Development Plan process could also include a mechanism for identifying potential sites, and during the consultation phase of Local Area Plans, community groups and members of the public could be encouraged.

A local designation would not preclude development in or adjacent to the area, but planning permission would be required and any development or construction must be sensitive to the local ecological site.

If primary legislation is required, the opportunity exists in the upcoming review of the Planning and Development Act 2000, which is due to commence pre legislative scrutiny before the end of 2022.

The Biodiversity Action Plan must be supported with a new 'Fund for Nature'

We acknowledge the significant additional funding for the National Parks and Wildlife Service, and the ongoing restructuring of the organisation to ensure it is fit for purpose for the future. In addition all Departments must be adequately funded and resourced to ensure the objectives and outcomes of the Biodiversity Action plan are realised.

The Plan must align with the forthcoming European Nature Restoration Law.

The law will set targets for nature restoration and protection across member states. Ireland Plan must align with these targets now to ensure we are on a pathway to meeting the targets by 2030, 2040 and beyond. The Biodiversity Action Plan must ensure that Ireland can and does restore and enhance our natural spaces with good quality spaces for plants, insects, animals, birds and fish to thrive and ensure our protected areas are protected in name and in reality.

² Reference: Department of Housing, Local government and Heritage: The Development Plans – Guidance for Planning Authorities (Reference: <https://www.gov.ie/en/publication/f9aac-development-plans-guidelines-for-planning-authorities/>)

Within the Nature Restoration Law, of particular note is Article 4 which establishes that Member States must put in place measure to ensure the restoration of Annex 1 habitats, and ensure that 'good condition' is established in 90% of Annex 1 habitats.

Article 6 includes the objectives to have no net loss of urban green space and tree canopy cover by 2030 compared to 2021, and an increase in urban green space and tree canopy cover of 3% by 2040 and 5% by 2050.

Article 7, the restoration of the natural connectivity of rivers and natural functions of the related floodplains and the removal of barriers to longitudinal and lateral connectivity of surface waters.

Article 8, 9 and 10, the restoration of pollinator populations, agricultural ecosystems and forest ecosystems.

In Ireland only 13.83% of land and 2.25% of marine waters are covered by protected areas under European Law. Of these the only 15% are considered to be in 'good' condition, with 46% in 'poor' quality and 49% in 'bad' quality. (Reference: Biodiversity: Information system for Europe, available at <https://biodiversity.europa.eu/countries/ireland>)

The designation of land for nature protection in Ireland has not always been straightforward. We must learn from mistakes of the past and improve consultations with landowners and local communities on the benefits of nature protection through designation, and the ongoing responsibilities and obligations. We must also incentivise farmers and landowners to put their land forward for nature protection outside of the National designation system, for nature enhancement and for the creation of new wild spaces. ACRES will go a long way towards encouraging better farming with nature, however land that is not actively farmed must also be recognised for its important contribution to nature, and such landowners must be able to participate in nature restoration schemes.

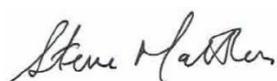
Enforcement through An Garda Síochána and our local authorities will be essential.

For too long lack of compliance with environmental law in Ireland has been tolerated. We must ensure our state authorities have the tools and the impetus to enforce existing environmental law, for example

- cases of illegal turf cutting in protected areas,
- wildlife crimes,
- water pollution,
- failures to implement the Nitrates Directive and Nitrates Regulations,
- illegal water abstractions and discharge,
- illegal dumping of waste,
- illegal cutting of hedgerows and trees during the breeding bird season.

Many thanks for the opportunity to comment this important plan.

Best wishes,



Steven Matthews TD

Consultant Director www.gaia-ecotecture.eu

Malcolm Noonan's intro is outstanding; the key word **is FLOURISHING !**

The purpose of this submission is constructive criticism ; to applaud what IS in there, and to suggest how it might be improved, while you have the precious chance .

The close-coupling of climate change with biodiversity collapse is under-emphasised: our flowers are currently blooming in 'Winter', while bees hibernate -an indicator for imminent collapse of our food-systems, come the 'Spring'?

This IS an **emergency**, as declared by our Oireachtas, three years ago now! ; this executive document does not convey sufficient urgency, in my opinion .

Several times I had the 'Groundhog Day feeling' – 'here we go again - yet more 'pities' very little & late action /enforcement; many nugatory and anodyne statements without 'traction'- all worthy strategy and few articulate tactics

A lot of the actions and outcomes are self-serving circular bureaucracy loops, NOT reflecting actual traction', re conserving remaining biodiversity.

Excessive focus on SACs SPAs Natura sites (all v important)? . Don't neglect the OBVIOUS – conserve and develop our blue-green grids, through urban areas – lets try to save ALL of the little we have left? . - we have lost 68% of our wildlife in my son's life time, so far, of only half a century !; how long more to lose the last third? – eg only 138 breeding pairs of Curlew left .

LAs are portrayed as guardians of biodiversity, whereas in fact they are among the worst offenders in my experience on the ground , mostly through ignorance and not a little arrogance . Radical retraining necessary; we engineers must be discouraged from assuming management positions: excessively dominant in Irish LAs, due traditions, since before the founding of our State – they do not have the relevant education for those roles – I am an engineer.

END of 2026 for LAs to have biodiversity plans!! – is THAT your sense of a 'national emergency' ? 4 years away !!!! Come ON ! It's far too late for that kind of sedate gradualism; 18 months MAX .

End of 2027 for biodiversity legislation ; FAR TOO LATE – 'emergency' response ? let's 'get real' about the rate of loss ?

Change the 'tidy' town concept to 'Bailte Beó' over three years, in synergy with current Town Centre First programmes , where apparent 'untidiness' is encouraged (if it's biodiverse) – replace monoculture lawns and flower beds / hanging baskets with flourishing wild flower meadows and margins ,using minimal mowing for access and safety . Bridgefoot St. and Park are good examples.

Re Irish language and culture, please reference our ancient Brehon Law which was implicitly imbued with treasuring our rich biodiversity and was conscious of 'keystone' species . It is deeply *dúchasach* within us - we just need to refresh the deepest intuitions of our culture?

Page 6

Top : include urban development as a cause , eliminating green 'islands' within our urban settlements, from villages to large cities .

Surely we have a better research ref on bee decline than Fitzpatrick 2007 – 15 years ago!- in a period of rapid decline ?

Page 29

This is much better with short, middle term specific objectives . eg 2 A7

Mention the approved and funded Biodiversity Centre at Islandbridge Chapelized by Dublin City Council, starting on site now – a major resource for LAs / school kids etc adjacent Heuston Stn; walking tours into actual riparian biodiversity under threat? . Use specific exemplars? ; amplify 'good news' of initiatives that work ?

Page 31

Shouldn't Udarás appoint a biodiversity officer to be a champion for this good work?

Page 33

2B3 seems remarkably unambitious ; these will NOT make the key difference required imho.

Mention Paludiculture and amplify the potential re Just Transition and the biodiversity potential on our re wetted peatlands many refs eg <https://www.moorwissen.de/cinderella.html>

Page 53

Whereas 'Wild Atlantic Way' may be a great marketing success for arguably unsustainable 'tourism'? - incentives to use EVs only on the WAW following arrival by surface travel ; a green pass might help with discounts and tax reliefs for participants ? The biodiversity impact is obvious ?

Page 56

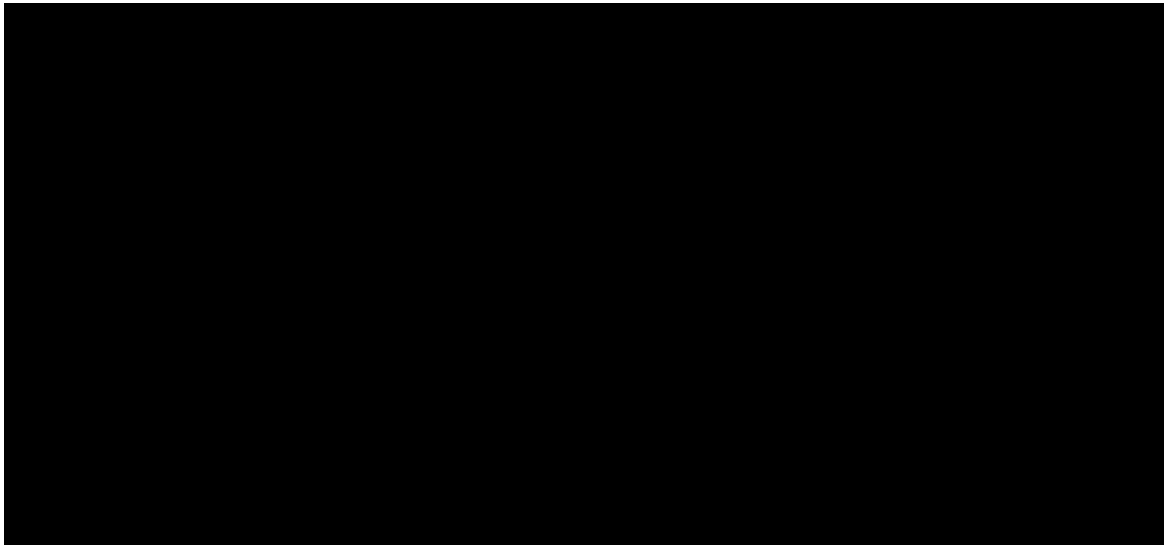
Adduce Paludiculture (as above) , a neglected Irish opportunity , in this crisis.

Page 59

OPR not to publish until 2026 !!! Not good enough – 18 months MAX .

Page 69

Placing an onus on Heritage Council is all very well but there is a limit to what 15 people in Kilkenny can do ? RESOURCES must be made available to achieve the objectives stated for the Heritage Council throughout this report ; a special division therein must be tasked ?



Submission by the Irish Uplands Forum regarding the 4th National Biodiversity Action Plan

The Irish Uplands Forum

The Irish Uplands Forum is an environmental NGO which was set up in 1996 following a conference in University College Galway on Seeking a Partnership towards Managing Ireland's Uplands. IUF covers the island of Ireland and members include environmental and land use specialists, landowners, recreational users and academics. Funding for its work comes principally from the Heritage Council but support has also been received from central government and a wide range of semi state agencies concerned with uplands and land uses. Since 1995, IUF has worked to raise public awareness of the importance of the uplands through other national conferences. It has supported upland partnership communities to organise locally particularly the Wicklow Uplands Council and Howth SAAO Management Committee, carried out pilot projects to examine innovative solutions to upland issues, conducted national research on socio economic aspects of uplands, and organised workshops and exchanges on new issues and challenges. See our facebook page for information on recent events. <https://www.facebook.com/irishuplandsforum/> This submission is concerned with the urgency to support local landscape partnership to protect designated sites.

Rationale

The attendance by IUF at the World Conference on Mountains in Perth, Scotland in 2015 where a presentation was made by IUF, revealed common global concern with declining farming, threats to biodiversity due to climate change and tensions over competing land uses. Within Europe the most significant policy initiative related to the uplands are the two biodiversity directives, Birds and Habitats. Currently the EU is funding an ambitious research project on blanket bog management which is focused on upland Natura Blanket bog sites in the west.

A brief review of the history of conservation management and sustainable development will show an early exclusive concern with species. This reflects a utilitarian concern with nature which was initially focused on species (to protect amenity for hunting). This was broadened to habitats when it was realized that certain areas i.e. wetlands, contained a large number of species. The next level of concern, the landscape approach has been poorly developed by the state in Ireland.

Our model of national parks is the closest attempt at landscape conservation but as administrators are wedded to state ownership, it offers little opportunity to demonstrate partnership or the implementation of Sustainable Development goals.

There are local examples of partnership approaches to landscape management which benefit biodiversity and which should inform future initiatives to implement the objectives of the 4th BAP. The most well known is Burren Beo in Clare which pioneered a new approach to farming for biodiversity. The following are accounts of two organisations which have mobilized community involvement in landscape management in the uplands:

Wicklow Uplands Council, NGO www.wicklowuplands.ie

This NGO was set up in the 1980's following an action research study commissioned by the local authority and NPWS and carried out by TCD Natural Resources Development Centre. Membership of WUC reflects the three aspects of sustainable development (economic, social and environmental). Funding has come from the Heritage Council, local authorities and state agencies (project based) and the private sector. They have carried out innovative local studies of forestry, farming, recreation which have informed national policies. Valuable representations were made to local development plans and an active part was taken in an effort to establish a landscape partnership in the Wicklow /Dublin Mountains.

The most significant impacts of WUC are its creation of a partnership approach between landowners, recreational users and conservation authorities and the promotion of innovative practical initiatives which could benefit other upland areas. From a start in the 1980's where there was significant antagonism between farmers and NPWS in relation to the establishment of the National Park, NPWS and farmers are now sharing responsibility for habitat management through the operation of SUAS, (Sustainable Uplands Agri-environmental Scheme) a European Innovation Partnership Project. Lobbying central government resulted in the Pure Project which deals with the issue of waste dumping in the mountains. The group also accessed Interreg funding to promote networking with similar projects in Wales.

Howth SAAO Management Committee was set up by Fingal County Council to manage the area designated as an Area of Special Amenity to maintain its recreation, biodiversity and landscape values. The SAAO incorporates the Natura site and Fingal Co Co is the Competent Authority for the SAC. The SAAO covers all the land within the Howth Head SAC and SPA almost all of which is privately owned. Membership includes landowners, reps of relevant sections of the local authority (parks, planning and heritage), NPWS and community general and specialist interests (tourism, community development and biodiversity). The group meets regularly to develop and monitor the implementation of their agreed strategy and plan (the latest plan is included in Appendix 1). The group has invested in research studies to provide baselines and management recommendations. Studies have focused on:

- Heathland management
- Breeding Birds
- Wildfire Management
- Wetlands
- Invasive species
- Lizard

Invertebrates
Ireland's Eye Management Plan
Redrock Management Plan

SAAO has inspired innovations such as a Wildfire Strategy and conservation grazing which are relevant to other upland areas and its project objectives are linked to the local authority Biodiversity Action Plan.

Conclusions

The operation of these two non-statutory bodies shows how a productive partnership between landowners, community, local authority and NPWS in areas subject to strict planning and land management controls can generate useful actions to benefit annexed habitats and manage development pressures.

They have offered opportunities for innovation to be tested through partnerships with the most relevant stakeholder, the landowner. By involving community representatives local education about biodiversity has been emphasised. Regular meetings offer an opportunity for mutual learning. Baseline accounts of biodiversity and management recommendations had to be produced in order to monitor the effectiveness of management.

As the operation of these organisations fulfills many of the objectives of the new BAP listed here:

- Whole of government approach
- Meet urgent conservation needs
- Emphasise nature's value to people (through farming study in Wicklow and recreation in Howth)
- Demonstrating climate action by developing and implementing management systems which protect peatland habitats
- Enhance the evidence base (particularly in Howth) and
- Interest in biodiversity management is a strong priority in both areas

it is submitted that the 4th BAP should contain an action to support other areas and communities to follow their example, particularly as there are now particular opportunities for funding area based initiatives related to climate, forestry, farming and water management thus supporting the whole of government approach. The BAP should offer support to the Irish Uplands Forum to allow them mobilise further upland partnerships. Without active management of designated sites following the model of WUC and Howth their value will deteriorate.

The government should implement the National Landscape Strategy and under its aegis commission research to identify appropriate mechanisms to provide statutory recognition and support for local partnerships concerned with landscape management. This may involve legislation which would also give long awaited recognition for the Irish model of National Parks. In the short term NPWS should co fund the Wicklow Uplands Council and carry out research to examine the potential for integration between the SAAO planning mechanism and requirements for Natura sites.

Signed

 Irish Uplands Forum

November 7th 2022

Appendix 1



Howth Special Amenity Order Operational Plan 2021- 2025



Howth Special Amenity Area Order (SAAO) Operational Plan 2015-2020

1) **Rationale for Special Amenity Area Order**

A special amenity area order (SAAO) is an environmental designation made under the Local Government (Planning and Development) Acts. It applies to an area which is either an area:

- of outstanding beauty,
- of special recreational value and/or,
- where there is need for nature conservation.

The SAAO provides the most secure type of planning protection for an area. The Howth SAAO made in 1998, was community led, granted by the Minister of the Environment and made by Fingal County Council.

2) **Rational for Operational Plan**

- The Howth SAAO came about as a result of community and public concern regarding the nature and scale of development on the Howth Peninsula.
- The Howth SAAO Management Committee is responsible for overseeing the implementation of the SAAO Operational Plan.
- The involvement of multiple stakeholders, in particular, continued community participation ensures greater implementation of the plan and ultimately more effective conservation and planning control.
- Approximately 8,000 residents and approximately 750,000 visitors/tourists use/visit the area. Howth SAAO covers an area of 547 hectares. It is essential that the area is managed properly and environmentally sustainable development occurs.

3) **Vision & Values**

Our vision is to ensure that the natural environment and development work hand-in-hand to conserve the Howth Peninsula & Ireland's Eye for future generations (*– taken from the Howth SAAO 1998*).

The values of the Management Committee are to:

- work in partnership
- protect the environment
- support sustainable development.

4) **Mission Statement**

Our mission is to deliver and maintain to the highest standards, the conservation management and development in the Howth SAAO area. This includes the facilitation of appropriate educational, recreational and community interests and activities, consistent with the conservation

imperative. This mission is to be achieved in co-operation with local interests, Fingal Co. Co. and other statutory agencies.

5) Working Sub-committees

1. Conservation and Recreation

This sub-committee deals with targeting actions for the Conservation management of Natural Heritage on the Peninsula. It also deals with the maintenance of the trail network throughout Howth.

Committee membership:

Mary Tubridy (Irish Uplands Forum), Philip O'Connor (SAAO chair), Conn Redmond (Howth Pathways), Dougal Cousins (Howth Pathways), Caoimhin O Laoi (Howth Pathways), Nessa O' Brien (Howth/ Sutton Community Council), Cllr. David Healy, Suzanne Ennis (Horse Owners), Ray Gilmore (Tetrarch)

Fingal County Council Support Officials:

Cornelia Raftery (Parks and Landscape Officer, Operations Department), Mark Finnegan (Parks and Landscape Officer, Parks and Green Infrastructure Division), Hans Visser (Biodiversity Officer, Parks and Green Infrastructure Division),

2. Planning, Communication and Tourism

This sub-committee deals with Planning issues, Communication of SAAO material both internally and to the wider public, and Tourism. It also deals with all matters relating to the Heritage Trail and built Heritage on the Peninsula.

Committee membership:

Jackie Feeley (Hillwatch), Edgar Mc Loughlin (Howth Peninsula Heritage Society), Mary O'Connor (Visit Howth Peninsula), Cllr. Aoibhinn Tormey. Fingal County Council

Fingal County Council Support Officials:

Gemma Carr (Parks and Landscape Officer, Parks and Green Infrastructure Division), Kathy Tuck (Planner, Planning and Strategic Infrastructure Department).

6) Achievements previous Operational Plan 2016-2020

The following projects were completed during the previous Operational Plan 2016 – 2020 by the SAAO committee and Fingal County Council:

- The upgrade of the entire walking trails network within the SAAO
- The provision of a new signage and waymarking scheme for the walking trail network
- The installation of 3no pedestrian counters

- The preparation of a management plan for the Council owned lands at Redrock
- The undertaking of woodland management works and hay meadow management at Redrock
- The preparation of a management plan for Irelands Eye and the implementation of pathway strimming and invasive species control works on the island
- The commissioning of nature conservation studies in the SAAO on breeding birds, bryophytes, lizards, beetles, wetlands and the heathland habitat
- The preparation of a wildfire management strategy for the heathland on Howth
- The undertaking of wildfire prevention measures, primarily by removing Gorse from strategic parts of the landscape
- Invasive species studies and invasive species removal works

7) Operational Plan 2021-2025

The overall list of actions can be divided between Habitat and Landscape Conservation Actions and more General Actions. Each topic under these two headings has a list of actions. These actions have a timeline for completion, person responsible for implementing the action and Key Performance Indicators (KPI's) which will be indicative of the success of each targeted action.

The tables below outlines the actions to be undertaken in the years 2021 – 2025. The 39 actions highlighted in green are the priority actions for the next 5 years as determined by the SAAO committee and Fingal County Council. The other actions may be implemented when opportunities arise. The implementation of all actions is subject to availability of funding and staff in any given year.

No	Action	Once off or Ongoing	Year	Project lead	KPI
Habitat and Landscape conservation					
Wetlands					
1	Restore Bog of Frogs by blocking the drainage channel at the eastern edge of the site and remove Downy Birch and Bracken	Ongoing	2022	Biodiversity Officer	Drainage channel blocked and Birch and Bracken removed from wetland.
2	Undertake drainage study of both golf clubs	Once-off		Biodiversity Officer	Drainage study completed and report prepared
3	Green Hollow – Remove Gorse from wetland	Ongoing		Biodiversity Officer	Annual % of Mature Gorse removed at Green Hollows
4	Kilrock Quarries – Clear Brambles and Gorse scrub and invasive species	Ongoing		Biodiversity Officer	Invasive species cleared and bramble cover reduced by 80%
5	Undertake Water quality survey of all water courses and wetlands in Howth	Once-off		Biodiversity Officer & Consultant	Water Quality assessment undertaken and report prepared
Redrock Management Plan					
6	To cut and collect the hay once a year in field 1	Ongoing	yearly	Biodiversity Officer	One cut taken from meadow per year
7	Cut back any growth of Bracken, bramble and other tall vegetation around the rare plant sites	Ongoing	yearly	Declan Doogue/ Biodiversity Officer	One cut taken from rare plant sites per year
8	Manage newly planted saplings in pine wood by strimming the weeds around them and replacing any dead trees	Ongoing	yearly	Parks and Landscape officer OPS	Weed control carried out 2 times per year
9	Re-route informal pathway across rare plant site and install signage to make visitors aware of the rare plants	Once off	2022	Biodiversity Officer /consultant	New pathway and signage installed
10	Plant trees at Redrock	Once off	2023	Parks and Landscape officer OPS	New woodland pocket planted

12	Monitor vegetation change using permanent quadrats and rare plants	Once off		Biodiversity Officer	Monitoring survey undertaken and brief report prepared
13	Repair wall along the boundary with Bellinghams Farm (fire management)	Once off		Parks and Landscape officer OPS / Biodiversity Officer	Wall repaired
Invasive species control					
14	Remove all invasive species from Offington Wetland + White water Brook - Removal of invasive species within the water course and ponds	Ongoing	2022/2023	Biodiversity Officer /Consultant	Invasive species removed from both sites
15	Develop and enact a Rhododendron Eradication Plan for the SAC which addresses seed sources	Ongoing	2021/2024/2025	Biodiversity Officer /Consultant	Plan prepared
16	Prepare tender and action removal of the following species on cliffs between Bailey and Redrock: - Carpobrotus edulis - Crassula helmsii - Gaultheria shallon - Veronica x franciscana	Ongoing	2022/2023	Biodiversity Officer /Consultant	Tender prepared and invasive species removed
Heathland Management					
17	Howth Goat grazing project	Ongoing	yearly	Biodiversity Officer	Acreage of wildfire breaks and heathland grazed and numbers of goats.
18	Monitor impact of goat grazing	Ongoing	yearly	Biodiversity Officer	Annual monitoring undertaken, brief report prepared and results presented to SAAO committee
19	Conduct small-scale cutting trials and monitor regeneration of Heather	Ongoing	2021, 2023, 2025	Biodiversity Officer	Annual monitoring undertaken, brief report prepared and results presented to SAAO committee
20	Monitor regeneration of vegetation after wildfire.	Ongoing	2021, 2023, 2025	Biodiversity Officer	Annual monitoring undertaken, brief report prepared and results presented
21	Reduce the proportion of dense Bracken and Gorse scrub within the heathland landscape from 36% (91.28 ha) to 20% (51	Ongoing		Biodiversity Officer	Bracken and Gorse cover reduced.

	ha) or less by conversion to Dry Heath, grassland or woodland				
22	Resurvey plot network in 2024.	Once off		Biodiversity Officer	Monitoring survey undertaken, brief report prepared
23	Engage with the public and stakeholders in relation to heathland management issues, including the provision of interpretative signage	Ongoing		Biodiversity Officer	At least 4 public meetings organised
Wildfire Management					
24	Establish Howth Wildfire Group	Once off	2021	Consultant/ volunteer	Group established
25	Organise Wildfire training for Wildfire group and DFB	Once off	2021	Biodiversity Officer /DFB	Training organised
26	Develop Operational Wildfire plan for Howth with DFB	Once off	2021	Biodiversity Officer	Operational Plan prepared and reviewed on an annual basis
27	Manage vegetation at Strategic Management Areas	Ongoing	Yearly	Biodiversity Officer	All tall Gorse removed from wildfire breaks and vegetation kept below 30cm.
28	Include a wildfire risk assessment in planning applications	Ongoing		Planner/ Biodiversity Officer	
29	Carry out study on developing suitable access to water supply for DFB at East Mountain, Green Hollows and Bellinghams Farm	Once off		Biodiversity Officer	Study undertaken and report prepared
Irelands Eye Management Plan					
30	Strim pathways each spring and maintain these on two dates between May and September + Install string fences to guide visitors away from seabird nesting areas and south beach during the period April to August + Reinstate spring	Ongoing	yearly	Biodiversity Officer	Circular pathway cut 3 times a year and string fencing installed. Spring reinstated
31	Install a pedestrian counter close to the main landing stage on the island	Once off	2021	Biodiversity Officer	Pedestrian counter installed and visitor numbers monitored
32	Monitor impacts of visitor management on breeding gulls by recording breeding success/productivity in sample areas	Once off	2023	Biodiversity Officer	Monitoring study carried out and report prepared
33	Provide an information panel on the west pier at Howth Harbour	Once off	2022	Biodiversity Officer	Information panel installed

	or on the island				
34	Improve landing place on east side of Martello tower by constructing a small landing stage with surfaces at high tide and low tide levels. Install hand rails on stage and steps	Once off		Tetrarch	Landing point upgraded
35	Set up a steering group for Ireland's Eye	Ongoing			Steering group established
36	Undertake clearance of litter and dumping on the beach and other areas of the island	Ongoing	yearly	Tetrarch/clean coast / local volunteers	Litter clean up carried out once year
37	Monitor vegetation change using permanent quadrats	Once off		Biodiversity Officer	Monitoring survey undertaken, brief report prepared
General Actions					
38	Review Road verges Management at Fintans cemetery and near the Summit	Ongoing	2021	Parks and Landscape officer OPS / Biodiversity Officer	Road verge management amended
39	Review sites of interest outlined in Protection Howths Habitats by D. Doogue	Once off	2023	Biodiversity Officer	Review carried out and report prepared
Planning and Development					
40	Planner to be designated/assigned to Howth SAAO Management Meetings and form part of FCC internal team for SAAO	Ongoing	yearly	Planner	Planner assigned
41	Ensure circulation of all relevant SAAO documents and information at all pre-planning meetings	Ongoing	yearly	Planner	Number of applications provided with SAAO documents
42	Update Design Guidance document for SAAO *	Once off	2022	Planner/ Parks and Landscape officer P&GD	Guidance document updated and made available to the public
44	Planning Enforcement to be engaged where planning breaches occur within SAAO	Ongoing	yearly	Enforcement Officer	Planning enforcement carried out where relevant
45	Make submissions on behalf of the SAAO committee to planning applications within Howth SAAO	Ongoing	yearly	Chair SAAO committee	Number of submissions made by SAAO committee per year
46	Integrate wider Howth issues in SAAO	Ongoing		Chair SAAO committee	
Visitor Management					

47	Conduct a review of the footpath network with specific regard to areas of erosion, particularly at Bellinghams Farm/Redrock	Ongoing	2022	Biodiversity Officer	Pathway review carried out and recommendations implemented.
48	Upgrade pathway network where necessary	Ongoing	yearly	Parks and Landscape officer OPS	Number of pathway locations upgraded per year in report format
49	Add additional signage along pathway network and remove obsolete signage where necessary	Ongoing	yearly	Parks and Landscape officer OPS	Number of new signs installed and excessive signs removed
50	Restore heathland where damaged by excessive trampling	Ongoing	2024-2025	Biodiversity Officer	Acreage of heathland restored
51	Pedestrian Counter Balscadden	Once off	2021	Parks and Landscape officer OPS	Counter installed and number of visitors monitored
52	Balscadden beach access study	Once off	2021	Senior Engineer, Transportation	Study completed and presented to SAAO committee
53	Assess impacts of new pathways and determine what options are available to stop new pathways being created	Once off		Biodiversity Officer	Impact Assessment carried out and report prepared
54	Liaise with horse owners on a regular basis	Ongoing		Chair subcommittee	At least 4 meetings with horse owners per year
55	Carry out a study on how to address mountain biking on Howth	Once off		Biodiversity Officer	Study carried out and report prepared
Communication and outreach program					
56	Develop and implement communication and outreach program	Once off	2022-2025	Parks and Landscape officer P&GD	Communication and outreach program prepared and number of actions implemented on an annual basis
Resource Allocation					
57	Develop a detailed and costed management plan for the Howth Head SAC	Once off	2022	Biodiversity Officer	Detailed management plan prepared
58	Prepare an options study for Howth SAAO trust or equivalent model to employ Ranger, Ecologist, Herder and Landscape manager	Once off	2023	Parks and Landscape officer P&GD	Options study undertaken and report prepared
59	Economic Impact Assessment SAAO area	Once off			Assessment undertaken and report prepared

60	Develop volunteering strategy	Once off		SAAO chair	Strategy developed and number of actions implemented on an annual basis
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Appendix A: Howth SAAO Management Committee & Key Stakeholders

Howth Special Amenity Area Order (SAAO) Operational Plan 2015-2020

SAAO Management Committee & Key Stakeholders involved in workshops

1. Membership of Howth SAAO Area Committee as stated in the original order

- 1) Fingal Co. Co. Elected Representatives
- 2) Community representatives including local landowners and relevant sectoral interests
- 3) People with specialist knowledge/expertise can be co-opted on

2. Role of Management Committee as stated in the original order

- 1) Develop a five year Operational Plan
- 2) Submit the plan to Fingal Co. Co. for formal approval
- 3) Monitor the environmental quality in the area
- 4) Monitor and evaluate the implementation of the plan

3. Fingal Co. Co. Elected Representatives

Elected Representative
Elected Representative
Elected Representative
Elected Representative
Donagh
Elected Representative
Tormey.
Elected Representative
Elected Representative

Cllr. Anthony Lavin
Cllr. Jimmy Guerin
Cllr. David Healy
Cllr. Brian Mc

Cllr. Aoibhinn

Cllr. Eoghan O'Brien
Cllr. Joan Hopkins

4. Community Groups Representatives

Howth Pathways

Hillwatch
Howth/Sutton Community Council
Howth Peninsula Heritage Society
Local Landowners

Visit Howth Peninsula Ltd.
Howth /Sutton Chamber of Commerce

5. Specialist Environmental Groups Representatives

Irish Uplands Forum
Dublin Naturalists' Field Club

National Parks & Wildlife Service

position vacant

6. Fingal Co. Co. Staff (in attendance)

Senior Parks and Landscape Officer (Parks and Green Infrastructure Division)

Kevin Halpenny

Assistant Staff Officer (Planning and Strategic Infrastructure Department)

Marie McManus

Biodiversity Officer (Parks and Green Infrastructure Division)

Hans Visser

Senior Executive Parks and Landscape Officer (Parks & Green
Infrastructure Division)

Gemma Carr

Executive Planner (Planning and Strategic Infrastructure Department)

Kathy Tuck

Executive Parks and Landscape Officer (Operations Department)

Cornelia Raftery

7. Other stakeholders that may be included

More community representation, volunteers, schools, visitors etc.

Other statutory & voluntary bodies e.g. Fingal Heritage Network; Fingal
Tourism; Fáilte Ireland; An Taisce; National Trails Office; Birdwatch Ireland;
Irish Coastguards; Cycle Ireland; Boat Clubs; Walking/Hiking/Cycling/Horse
Riding/Golf Clubs; Dublin Bus; Dublin Transport; the National Transport
Authority; Irish Wheelchair Association etc.

Submission to the NBAP and Citizens Assembly on spatial planning and biodiversity

This submission is based on the experience of a consultant ecologist, [REDACTED] CIEEM and MIPI who has operated an independent ecological consultant since 1994. Appendix 1 contains her consultancy profile and CV.

Rationale

Over the last forty years there has been a particular increase in the regulatory effort to manage biodiversity. In recent years this has focused on the implementation of the Birds and Habitats Directives. There is increasing interest of the public, communities and local authorities in biodiversity i.e. National Conference on Biodiversity, national and local BAPs and the operation of a Citizens Assembly. The wider interest of sectoral interests is also reflected in the use of new concepts describing nature conservation such as i.e. Green Infrastructure, Rewilding, Natural Capital Accounting and Nature Based Solutions.

Despite the increasing amount of regulation and numbers of ecologists working in this sector biodiversity is in crisis. Based on considerable experience of biodiversity and its management this submission suggests a range of initiatives, which should be part of the new BAP to improve prospects for biodiversity.

1 Landscape based approach to biodiversity

A short review of nature conservation and management will show its evolution from an exclusive concern with species; to habitats, places where species live. The wider scale of focus, the landscape, which incorporates species, habitats and people, has been poorly developed in Ireland. Our model of National Parks, which is focused on state ownership, offers little opportunity to demonstrate partnership or the implementation of Sustainable Development goals. Research should be carried out to examine the potential for a locally based landscape approach to biodiversity management.

2 Active management of SAC's

Few Natura sites are actively managed to maintain and enhanced biodiversity. It is recommended that NPWS set up a management body for each Natura site led by a project officer. Management authority could be shared with a statutory agency such as OPW, Waterways Ireland, Local authority, an NGO or local community based organization.

The first step in this arrangement is to clarify current status of biodiversity and what needs to be done to protect and enhance it. Action plans should be developed with stakeholders i.e. farmers or fishers. Funding if required should be accessed from various sources including Acres, Leader, Heritage Council and News farm management plan funding. Regular reporting on progress to implement the Action Plan should be provided to the NPWS.

3 Establishment of a National Biodiversity Forum

While the original Wildlife Act resulted in the Wildlife Advisory Council, a body with similar scope no longer exists. A national biodiversity forum should be set up with reps of regulatory authorities, NGO'S and users. The operation of such a forum would result in fewer cases being submitted to EU courts. This body should commission research on biodiversity and report on its status every five years. There is particular potential to use the data now available through the national land cover map to identify where government could reach 30% nature recovery target, specify rare land covers X country and county, and define other types of protected areas i.e. areas of national or county interest.

4 A review of the role of competent authorities

Legislation to allow for the implementation of the Habitats Directive decreed that statutory agencies including all local authorities, Waterways Ireland, OPW, Forest Service, Inland Fisheries Ireland and the Dept of Agric, Marine would act as Competent Authorities or CA's deciding on the significance of the impacts of development on Natura sites. Outline guidelines were provided by the NPWS to

describe the assessment system called Appropriate Assessment. The final arbiter of this assessment is not the NPWS but the competent authority. Currently NPWS is only a statutory consultee. However the system appeared instantly and there has been little NPWS guidance or co-ordination. In some cases there is a conflict between developer and regulator and there is evidence of different standards. It is recommended that NPWS take a more active role in supervising the operation of CA's. A review of their operations should be carried out regularly and if not delivering, responsibility should be assigned to another agency.

5 Provision of ecological expertise to local authorities

Currently there are plans to appoint a biodiversity officer to each local authority. It is recommended that two biodiversity officers should operate in each county. One to be involved in soft initiatives and another to advise local authority about the relationship between development and biodiversity.

One of these officials could be proactively involved in assessing the biodiversity impacts of development. Under Aquaculture licensing system once an applicant applies for a license the state carries out all baseline studies to examine potential for works. However in our current planning system the developer is responsible for producing this report.

This requirement has equity implications as developers living in the least affluent parts of Ireland are more likely to be required to carry out ecological assessments and there is an obvious risk of bias in these reports.

Expansion of the role of the NBDC

It is recommended that the NBDC should expand its remit to collect and disseminate information on habitats. The results of the latest national land cover study should be available through the NBDC. Important information on habitat quality such as information on important spawning streams and water quality should be linked to this.

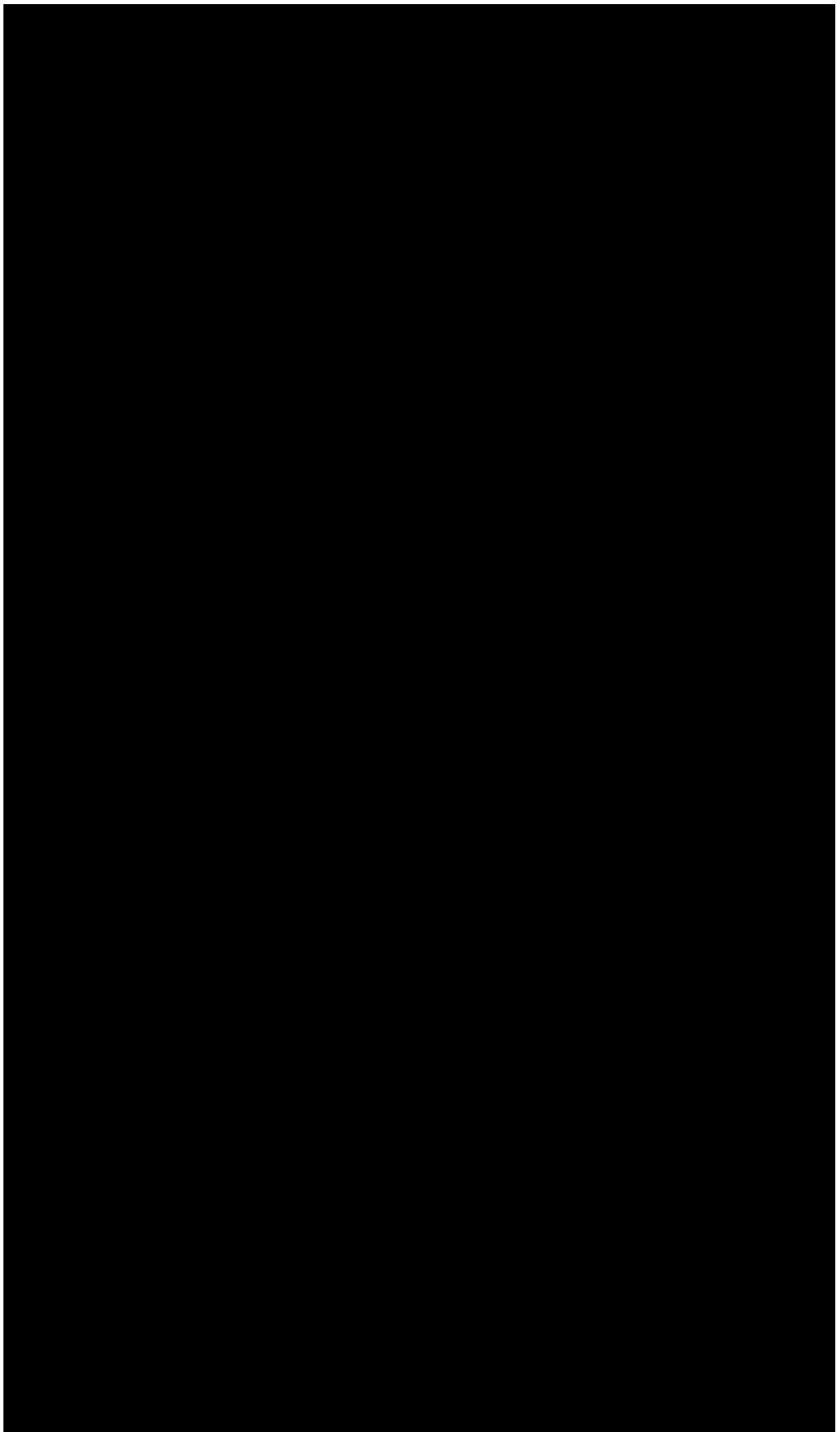
Appendix 1 Consultancy Profile

██████████ is an independent environmental consultancy specializing in integrating biodiversity and development. Projects have ranged from environmental impact, spatial planning, recreation and sustainable tourism, agriculture, forestry and environmental education.

Clients below include individual developers, architectural and planning consultancies, local authorities, government bodies, non-governmental organizations and research and teaching institutions.

AFEC Ltd Project managers
Airfield Farm (Dromartin Ltd), Dundrum, Co Dublin
Ait Landscapes
Arklow Urban District Council/Fas
Architecture Republic, Dublin
Auveen Byrne and Associates, Planning Consultants
Ballyhoura Failte, Kilfinnane, Co Limerick
Ballymun Regeneration Limited
Ballymun Tidy Towns Group
Blackwood Associates
Blackstairs Farming Group
Blackwood Associates
Brendan Mc Grath and Associates, Planning Consultants.
CAAS Ltd
Church Road Residents Association, Killiney, Co Dublin
Clare County Council (Heritage Officer)
Collen Project Management, Dublin
Coon Tidy Towns, Co Kilkenny
Compass Informatics, Dublin
Conor Furey and Associates, Planning Consultants
Davy Hickey Project Management Services
Dave O' Connor, DMOD Architects
Department of Education and Science
Duchas (National Parks and Wildlife Service)
Dublin City Council (Heritage Officer, Parks, Drainage and Planning Depts)
Dun Laoghaire Rathdown County Council (Biodiversity Officer, Parks, Housing and Roads Depts)
Environmental Protection Agency
European Forum for Nature Conservation and Pastoralism
Fenton and Associates, Planning Consultants now Tracy Armstrong and Associates
Fingal County Council
FORUM Community Development Project, Letterfrack, Connemara.
Future Analytic Consultants Dublin now KPMG/FAC
Comhar, DOEHLG.
Henry J. Lyons and Partners
Ireland West, Bord Failte.
Irish Uplands Forum.
Kildare County Council (Heritage Officer)
Kilcullen Community Action, Kildare

Killucan Community Development Group. Westmeath
KSN Project Management (for Department of Education and Skills)
Liberties Regeneration Project, Dublin City Council
Laois County Council (Heritage Officer)
Lucan Spa Hotel, Co Dublin
Meath County Council (Heritage Officer)
Michael Cummings, Planning Consultant, Dundalk.
Mullagh Sports Partnership, Co Cavan
Myshall Muintir na Tire, Co Carlow
National Economic and Social Forum
National Parks and Wildlife Service
National Spatial Strategy and EPA (with Compass Informatics)
Newenham Mulligan and Associates, Architects, Dublin
Norton / LOCI, Dublin
Office of Public Works (Historic Parks and Monuments)
Conor O' Reilly, Consultant Hydrologist
Owendoher Residents Association, Rathfarnham, Co Dublin
Peter Oakes Architects
Phibsboro Tidy Towns Group
Ronan Mc Diarmada Landscape Architects
SEMPA Project, Fingal County Council (EU project)
Solearth Ecological Architecture, Dublin.
South Dublin County Council (Parks Department)
GAA Club, Donore, Co. Meath
SRUNA Project, Dublin Regional Authority and Local Authorities within
Dublin and East region (EU Project)
The Heritage Council, Kilkenny
Tourism Development International Ltd.
Trinity College (Natural Resources Development Centre).
Westmeath County Council (Heritage Officer, Roads Dept)
Waterways Ireland
Wicklow Rural Enterprises Ltd. (LEADER Company)
Wicklow Uplands Council

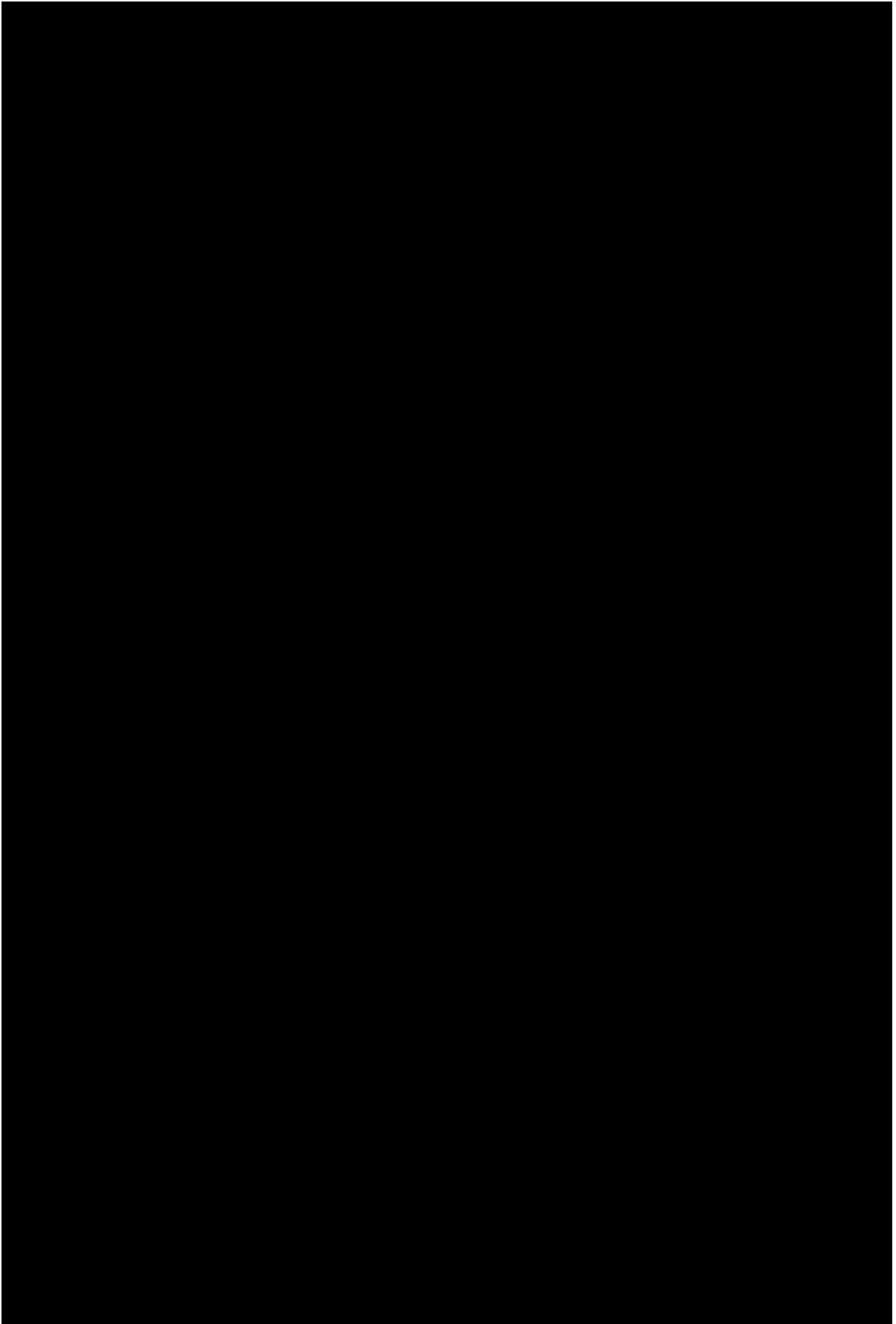


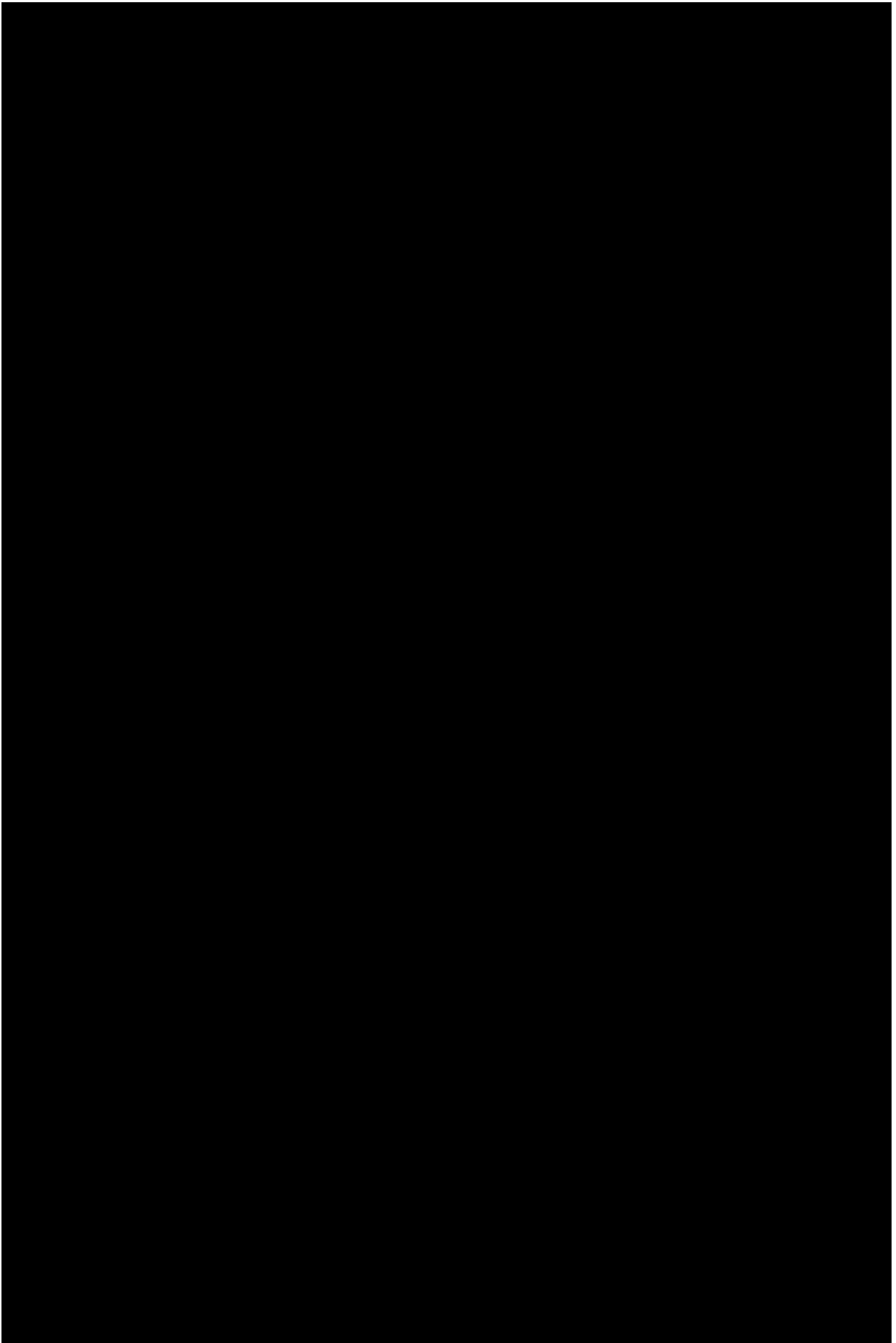
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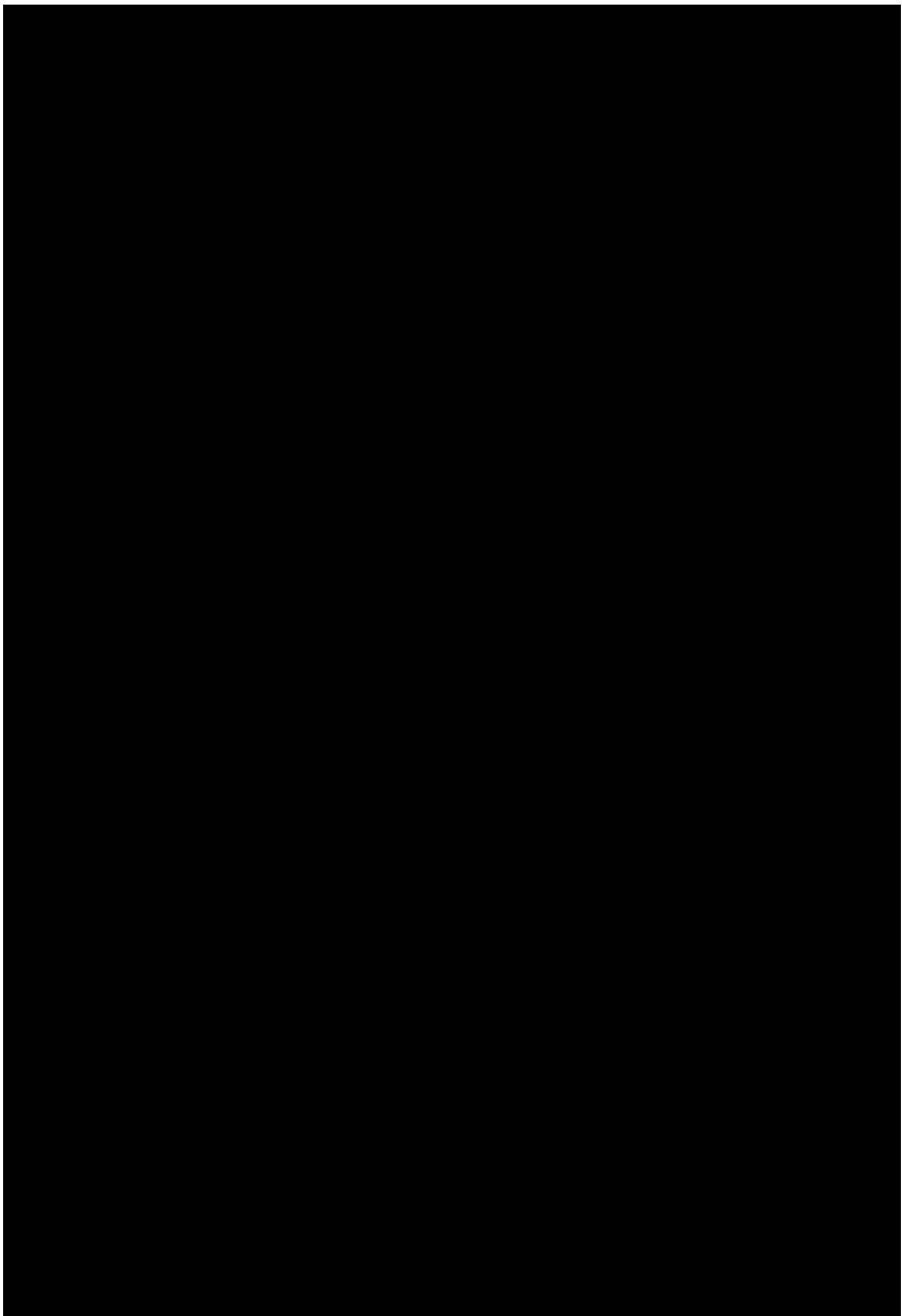
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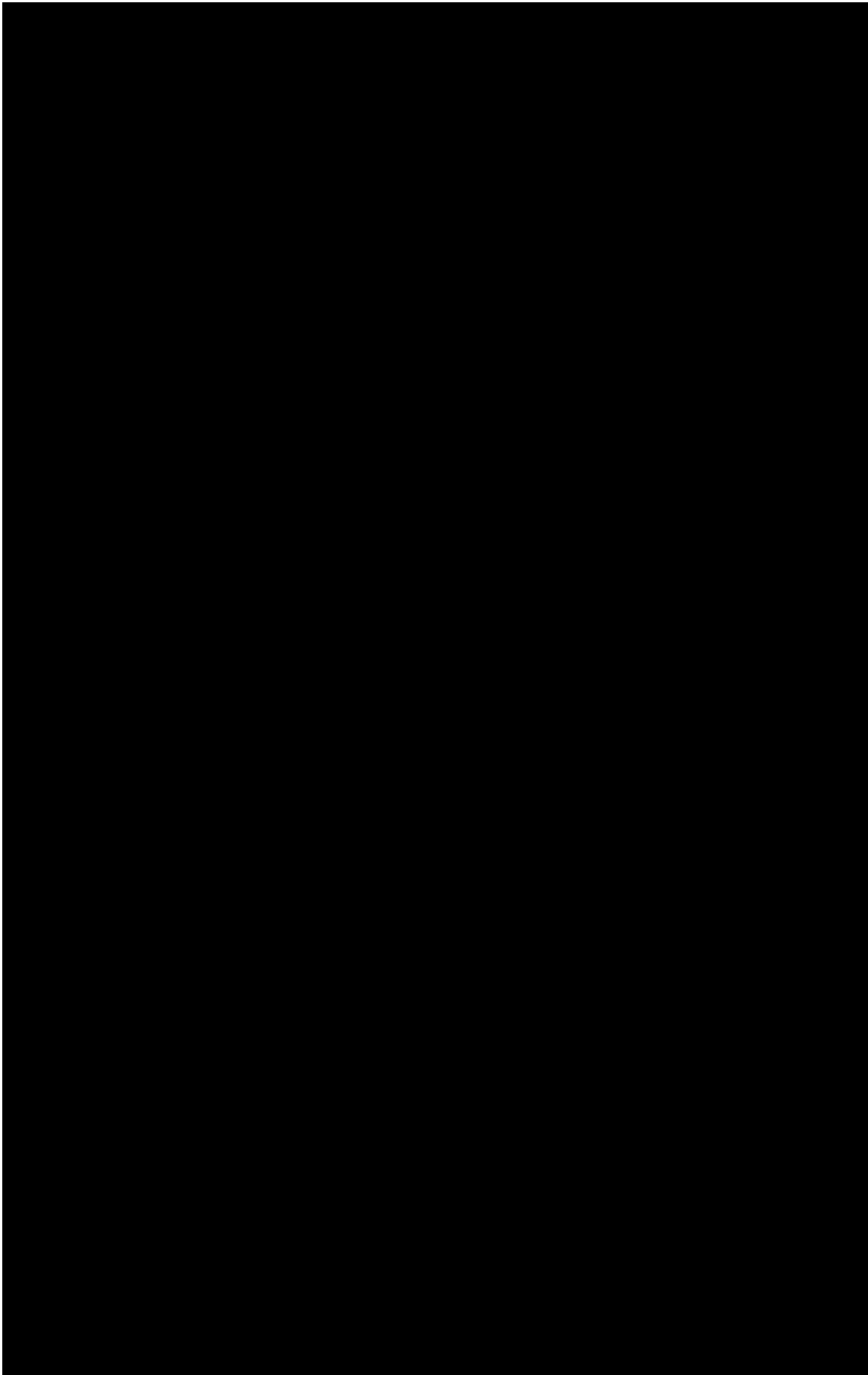
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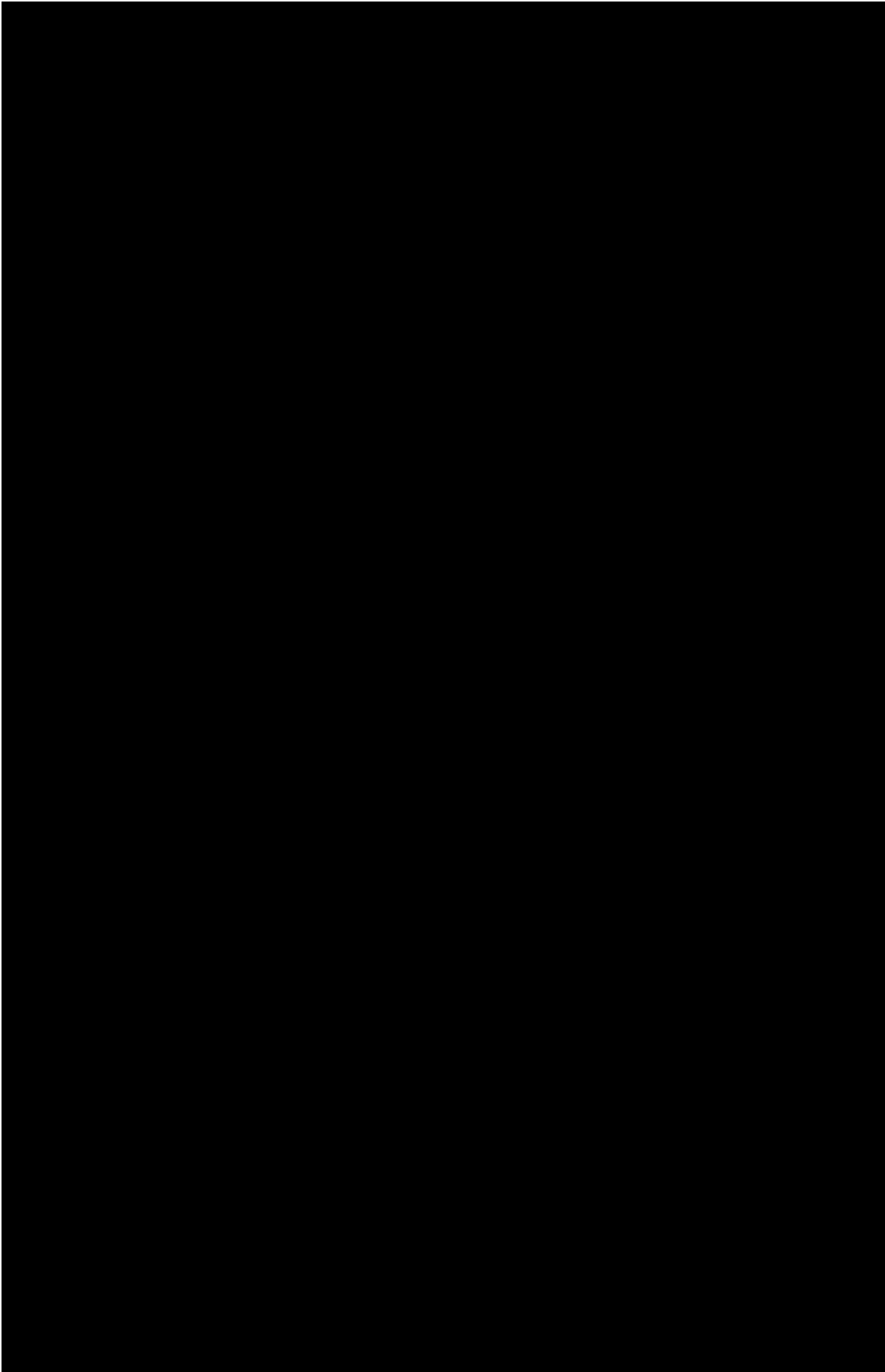
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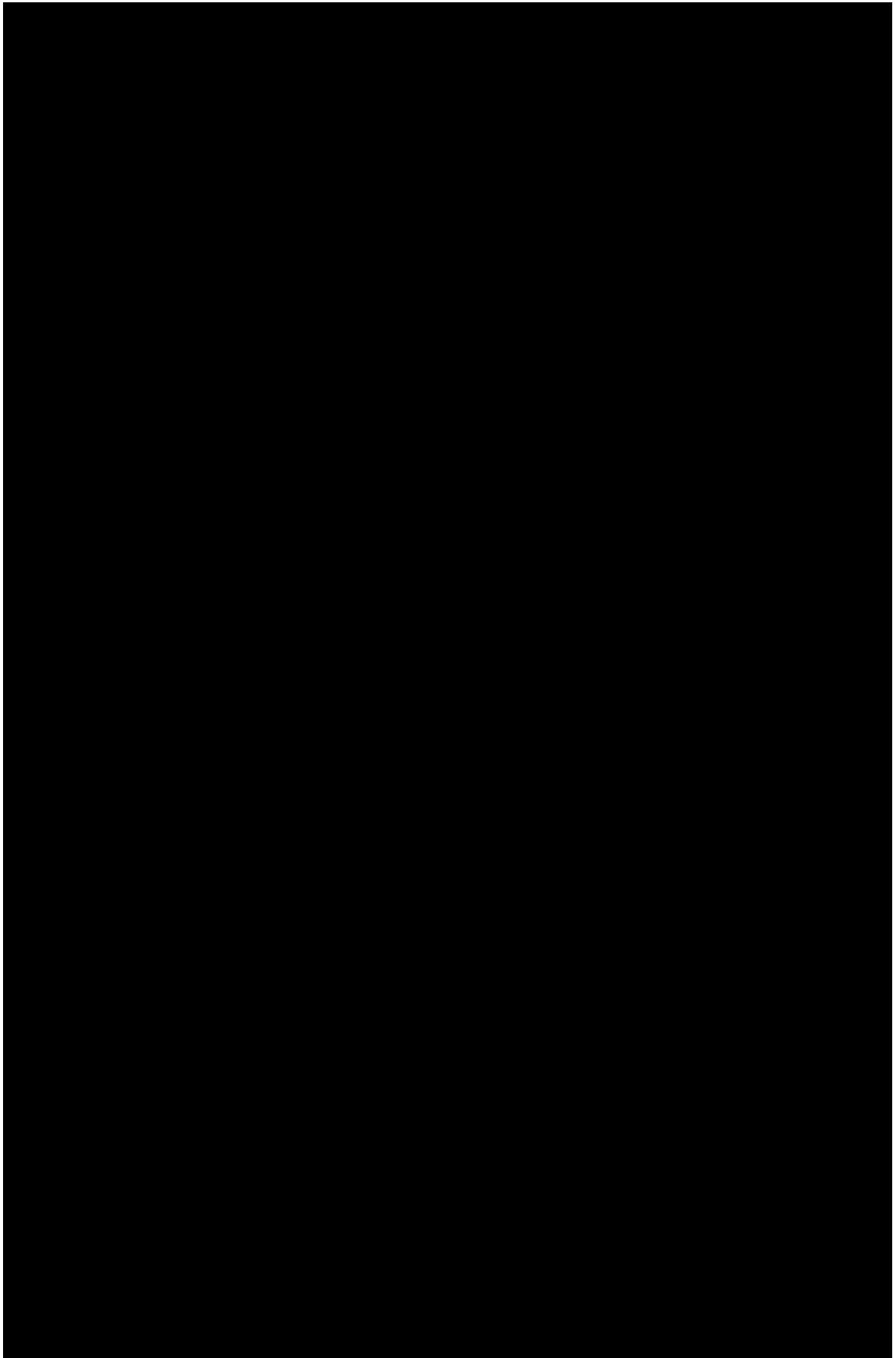


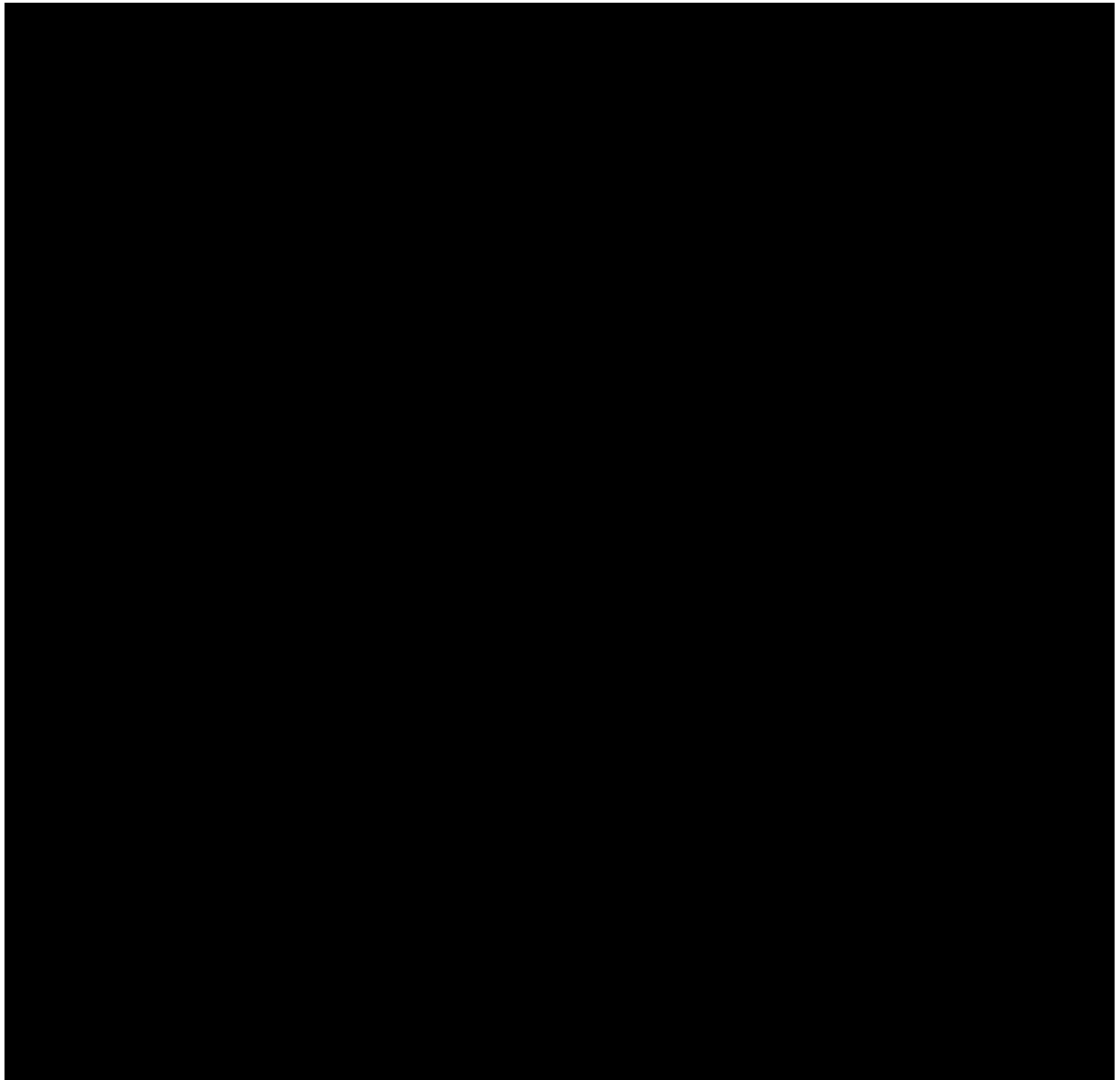












Biodiversity Action Plan draft

General

1. I would like to see this biodiversity action plan be given legal status similar to the Climate Action Plan
2. I would like to see all government departments adopt this plan and each BioD plan going forward, especially the Department of Social Protection. Various employment schemes for example Community Employment (CE) place workers on the ground to assist communities with Biodiversity related projects. They need training in biodiversity related topics. There are few if any accredited courses suitable for CE. The Department insists that courses are accredited. Many ENGOs and Councils offer excellent training initiatives they are rarely attended by CE (TUS, RSS, FAS etc).
3. All community and voluntary groups receiving public funds to develop an outdoor area/nature space, some oversight is needed by an ecologist/local heritage officer/Biodiversity officer/ Inland Fisheries/NPWS/LAWPRO Officer to ensure the community plans don't negatively impact on any aspect of local biodiversity or is contrary to the Climate Action Plan.
4. I would like to see the NPWS, Inland Fisheries, LAWPRO, seriously come together with LEADER to offer training in the sustainable removal of invasive species including Japanese Knotweed, Rhododendron. This will be a win-win for all. Communities have the people on the ground who want to help, LEADER has the money, the other agents have the expertise. For some Community Groups, LEADER is an onerous task and often requires bridge funding.
5. All County Councillors urgently need training in Biodiversity issues.
6. We need to empower the Planning Process to stipulate and enforce correct management of hedgerow management. We need to seriously request where a hedge is removed to facilitate building (commercial, personal, public) that the replacement hedge is replaced with suitable mixed native species.
7. I would like Councils to work with Hedgerows Ireland or similar in the delivery of training to all involved with hedgerow cutting as part of a certification programme. WE need to develop a countrywide register of properly trained hedgerow contractors including their machinery to help reduce/eliminate badly trimmed hedges. In addition, I'd like to see these same hedge contractors receive training covering expert tree surgery skills. This will help maintain healthy trees found in hedgerows. Maybe the likes of Teagasc could play a role here too.

To whom it may concern.

Ireland's 4th National Biodiversity Action Plan appears to have great ambition but needs more in terms of very solid and clear actions to address biodiversity loss in Ireland. Not all of our native species which need support are prioritised under EU Birds and Habitats Directive and those that are not listed or regulated by the EU tend not to attract any attention or monitoring investment. There is also the opportunity now to get every citizen involved in conservation and support of local biodiversity this plan will also need to be accompanied by a suite of guided and directed actions for each sector of society so we can truly achieve a "whole of society approach" to this emergency.

Please find attached in word some detailed comments on the current 4th National Biodiversity Action Plan draft for consultation.

1. Do you think the Vision and Objectives capture the major themes/challenges that you see for biodiversity? In other words, if Ireland achieves these Objectives by 2027, would we have made significant progress towards addressing the biodiversity crisis?

Ireland's 4th National Biodiversity Action Plan has great ambition but needs more in terms of very solid and clear actions to address biodiversity loss in Ireland. Not all of our native species are prioritised under EU Birds and Habitats Directive and those that are not listed or regulated by the EU tend not to attract any attention or monitoring investment. There is also the opportunity now to get every citizen involved in conservation and support of local biodiversity this plan will also need to be accompanied by a suite of guided and directed actions for each sector of society so we can truly achieve a "whole of society approach" to this emergency.

2. Do you have any comments on the Outcomes included under each Objective in the Draft NBAP? Do you feel that these Outcomes adequately address the Objectives under which they are situated? Do any additional outcomes need to be added to meet the objective?

Comments in table below

3. Are there any Actions in the Plan that you feel require amendment? Or indeed, are there additional actions needed? If additional actions are needed, who should implement these actions?

Comments in table below

4. Biodiversity is not the responsibility of any single body or sector but requires engagement and partnerships across government and communities. As such, the NBAP seeks to promote a 'Whole of Government, Whole of society' approach to biodiversity in Ireland. In your view, what can be done to further promote public and community engagement around biodiversity under the NBAP?

Citizens assembly an excellent initiative it does need a coordinating body to drive forward change in this area – spreading it out through the whole of government risks , law of the commons everyone doing nothing. Sadly we also need some stick as well as the carrot.

5. Are you (or your organisation) involved in any initiatives or work which could be relevant to the 4th NBAP (in terms of informing new actions, providing useful case studies, etc)? If so, please detail below.

Have some case studies on rare species, invasive species, conservation action definitely needed, our role as biodiversity consumers, globally linked to every part of the world now with our consumption.

6. How can we ensure that the 4th NBAP delivers for biodiversity and is implemented successfully?

Biodiversity officers implementing it locally , sector targets will really work .. targets simple clear and actionable

Do you have any other comments on the current draft of the 4th NBAP?

Yes specific items below

Item	Suggestion /comment
Objective 1 Adopt A Whole of Government, Whole of Society Approach	Objective 1 Whole of society approach .. <i>its less jargon and shows that everyone is involved at every level</i>
Objective 2 Meet Urgent Conservation and Restoration Needs	Objective 2 Action for conservation and restoration .. <i>again less about meeting and more about action</i>
Objective 3 Secure Nature's Contribution to People	Objective 3 People and Nature - one planet one health . .. <i>highlighting especially living with covid that we are all linked to the health of nature and it is important to everyone</i>
Objective 4 Achieve a Just Transition to a climate resilient, biodiversity rich and carbon neutral society	Objective 4 Building our sustainable future - Build a Carbon neutral, sustainable and biodiversity country which is climate resilient – we really need to go there <i>“a just transition”</i> can be really automatically implied as a national responsibility
The root causes and key drivers of biodiversity loss are tackled by each responsible department	Suggest some effort by made here to have some joined up thinking between departments responsible <i>“ the root causes and key drivers of biodiversity loss are tackled collectively and sensibly at local and national level through increased co-operation and clarity in work practice”</i> .

Outcome 1D: Biodiversity initiatives are inspired and supported across the whole of society	Increasing biodiversity awareness by 20% is very low target given in Irelands 6 th report to CBD on p120 we outline that people are already 60-70% aware of biodiversity. NPWS Biological Diversity web.pdf
Objective 2 Meet Urgent Conservation and Restoration Needs	Need to add an outcome <i>to ensure that trade in products in Ireland have no impact on global biodiversity</i> e.g. some current international biodiversity loss issues - palm oil, timbers, alternative medicines.
Status assessments of habitat and species reflect an increasing trend by 2030	Distinct lack of support for specific rare plant related conservation programs. The focus appears on EU protected species and species groups which don't include other nationally important rare and threatened species.
Ratification of the Nagoya Protocol	We need more ambition in our ratification of the Nagoya protocol.
Legislation for provisions under EU Regulation on IAS is published and enacted	The legislation and coordinated approach to IAS in Ireland is urgently needed. We need the all-Ireland Invasive species Ireland working group reestablished and EU IAS regulation parts 49 and 50 legally in operation.
Key skills in biodiversity/taxonomy disciplines have increased, with PhD opportunities available by mid-2024	Lack of taxonomic skills and skills in recording and monitoring biodiversity a key issue. This is a crucial skill if we are to develop indicators and report on biodiversity going forward.
Data on biodiversity and ecosystems, including conservation needs, is widely accessible and standardised	Key role of the National biodiversity data centre. Centre needs to be a formal national institution. Currently lack of trust among some groups that the centre is a private company and the data is not state managed.
Ireland has increased its support of international initiatives for the governance of biodiversity and ecosystem services	No mention of CITES – Convention on International Trade in Endangered species of wild fauna and flora. Ireland has a surprisingly very active export trade in its wild species such as birds of prey, and significant import trade in tropical corals, alligators, tropical timbers, venom etc. Ireland also contributes to EU working groups working to ensuring sustainable trade of wildlife and wildlife products into Europe. Tackling wildlife crime and sustainable global trade in wild plants and animals a key role for Ireland locally and internationally. We are globally linked with international trade some of the key issues facing the world such as tropical deforestation as Ireland imports a lot of timber from east Africa and Irish crime gangs linked to Rhino trafficking etc. Every government tender needs to specify that any materials used come from a sustainable and

	renewable resource to support circular economy.
Number of newly introduced invasive alien species	Some invasive species may be species which have been introduced in the past and have recently started to show signs of invasiveness and not necessarily new introductions. Looking at exotic species existing in Ireland and species the horticultural industry also warranted.



COMMENTS AND RECOMMENDATIONS ON IRELAND'S 4TH NATIONAL BIODIVERSITY ACTION PLAN DRAFT

The All Island Climate and Biodiversity Research Network (AICBRN) brings together researchers from a wide range of disciplines across the island of Ireland who are undertaking research in biodiversity and climate topics. The Network has received funding from the National Parks and Wildlife Service (NPWS) for five years, covering the lifetime of the 4th NBAP. The AICBRN's ambition is to provide a robust evidence base for biodiversity and climate trends and action. Funding has been secured from the NPWS for a Joint Secretariat between AICBRN and the National Biodiversity Forum (NBF), enabling coordination of the large-scale funding applications and connection to societal priorities needed to build evidence-based policy and action throughout government, industry, and society. The AICBRN recognises the need to address threats to biodiversity not directly related to climate, to enable resilience to climate change shocks. In the following, we provide key recommendations and comments within the following structure:

1. Summary of Key Recommendations
2. Comments on the General Structure of the Draft NBAP
3. Comments on the Interlinkages Between Climate and Biodiversity
4. More Detailed Comments

1. SUMMARY OF KEY RECOMMENDATIONS

- a. There is a strong need for increased ambition and strategic objectives that describe what good or better looks like for biodiversity in Ireland. Quantifiable actions with deadlines should then be put forward that will enable achievement of those objectives.
- b. NBAP needs to be a key vehicle to deliver on the national climate objective for “a climate resilient, **biodiversity-rich**, environmentally-sustainable and climate-neutral economy”.
- c. An all-island research hub for climate and biodiversity action should be established to build the evidence base for climate and biodiversity action to support the national climate objective and biodiversity ambition of the NBAP.
- d. In many cases the outcome and targets need to be more precisely specified. The actions, if successful, need to lead to the specified targets and outcomes, and the indicators need to give some basis for assessing the success of the action. This is not the case in the present draft.
- e. In addition to the envisioned positive outcome there needs to be a “consequences of failure” of the action where the diverse costs of failure to different sectors are outlined. A risk register approach, as is commonly used in project management, may be helpful here to highlight actions that, if unsuccessful, are likely to lead to serious consequences. Mitigation measures can then be put in place to mitigate failure.
- f. Add an action as follows: “A research hub for climate and biodiversity action be established to build the evidence base for climate and biodiversity action to support the national climate objective and biodiversity ambition”. The AICBRN will be named as an action contributor, however key funding stakeholders should be named including: HEA, NPWS, EPA, SFI, DAFM etc. to ensure that appropriate funding vehicles are put in place to enable this action.

- g. In the introduction the NBAP should explicitly recognise that a vision for a “biodiversity rich” outcome is stated in Ireland’s national climate objective and that national climate action plans should be held to account for achieving this outcome. This is a legislative basis for action on biodiversity. Further legislative basis for the NBAP could build on this step, with the NBAP contributing to the national climate objective as well as the conservation and restoration of biodiversity for other reasons.
- h. The NBAP needs very clear objectives that will achieve a “biodiversity-rich” economy; what does this look like? Identify clear biodiversity indicators (Habitats & Birds Directives reporting, species threat status, ongoing monitoring programmes for key habitats and species etc.) and ambitions for where they should be by the end of the 4th NBAP period.

2. COMMENTS ON THE GENERAL STRUCTURE OF THE DRAFT NBAP

Subject	Analysis/Critique	Recommendations
<i>Vision, p. 19</i>	<p>1. The vision is static. “Maintaining ecosystem services” is insufficient when we know that ecosystem services have already been seriously degraded. For example, the provision of clean water is at an unacceptable level and just maintaining it at this level is equally unacceptable.</p> <p>2. The Ireland in ‘2050’ vision reinforces an extended plan. It would be much better to focus on 2030 rather than 2050 and thus reflect the imperative for action.</p>	<p>1. Use more ambitious wording: “improving ecosystem services”.</p> <p>Consider using a stronger statement of environmental justice in the current phrase “delivering benefits essential for all people” as the benefits of ecosystem services need to be delivered fairly across society (e.g., access to high quality green/blue space) - “delivering essential benefits fairly to all people”.</p> <p>2. Objectives and actions need to be clearly time-bound, particularly to the period up to 2030.</p> <p>3. The plan doesn’t reach to 2030, so it would benefit from a statement that makes sure that issues raised in the current NBAP will be carried over to the next</p>

Subject	Analysis/Critique	Recommendations
		<p>plan, and progress recorded in the next plan is captured. Otherwise, programmatic memory is lost as is progress towards targets beyond the lifetime of the present plan.</p>
<p>Overall Framework: Outcome - Action-Indicator</p>	<p>1. We welcome the general structure of the draft NBAP and the ambition to deliver “the transformative changes required to the ways in which we value and protect nature”. However, as currently envisaged the outcome-action-indicator structure is not likely to help deliver the transformative changes needed.</p> <p>2. Action ownership is not identified for many targets. For example, <i>Action 4A2 (p.61)</i> mentions relevant departments, agencies, and relevant academic institutions North and South. With such broad ownership how can progress be tracked?</p> <p>3. Many of the actions are still open-ended and non-specific which will make them difficult to evaluate and/or not successful as indicators of the desired outcome. Improvement of the outcome-indicator structure needs to be undertaken to make it clear that if the action is successful (as per the specified indicator) that</p>	<p>1. The NBAP must specify action contributors and action owners as these are critical for accountability and monitoring. There is a difference between contributors and owners and this distinction needs to be clear. The main accountable body is the Biodiversity Working Group and therefore action owners need to be members of this body.</p> <p>2. In many cases the outcome and targets need to be more precisely specified. The actions, if successful, need to lead to the specified targets and outcomes, and the indicators need to give some basis for assessing the success of the action.</p> <p>3. Critically assess the impacts of actions as well as what might happen if actions are not fully successful. This would provide increased motivation to act.</p> <p>4. Number the targets so it is clear how actions are grouped into higher level targets and so that assessment can be made of whether the actions are sufficient to achieve that particular target.</p>

Subject	Analysis/Critique	Recommendations
	<p>the target will be achieved. In many cases this is not at all clear. For many of the indicators “the number of ...” a particular output is specified without any indication of how many is sufficient or any indicator of quality of output. For example, there may be a priority list of datasets needed for an adequate ecosystem service assessment, the output of a number of datasets is an insufficient indicator of the output of particular critical data sets.</p> <p>4. Targets must be achievable given the stated actions; in some cases, it is difficult to see how the actions will enable the target to be reached. For example, the target “All habitats and species are in, or moving towards Favourable status as required under the Habitats and Birds Directives with status assessments of Habitats and Species reflecting an increasing trend by 2030” is a target that could be strengthened (what is meant exactly by “an increasing trend”?) but the actions assigned to it are completely insufficient. 2A8 & 2A9 are about <i>ex situ</i> management which does not directly address habitat or species trends in</p>	<p>5. In addition to the envisioned positive outcome there needs to be a “consequences of failure” of the action where the diverse costs of failure to different sectors are outlined. A risk register approach, as is commonly used in project management, may be helpful here to highlight actions that, if unsuccessful, are likely to lead to serious consequences. Mitigation measures can then be put in place to mitigate failure.</p>

Subject	Analysis/Critique	Recommendations
	<p>the wild and 2A10 deals only with ÚnaG operational zones.</p> <p>5. One reason for the implementation gap is that the consequences of failing to meet targets and make progress on actions are not clear. We know that failures of actions lead to further degradation of biodiversity, with few if any further consequences explicitly mentioned. Examples of consequences of failure currently include: litigation in local, national, or international courts with consequent financial costs for the state (& tax payers), higher costs of utilities (e.g., water treatment), lower crop yields, health impacts for the public without access to high quality green and blue space for exercise and mental health etc. These very real consequences need to be made clear with action owners responsible for the consequences, action owners must be accountable for failure to achieve targets and make progress on actions.</p>	

Subject	Analysis/Critique	Recommendations
Monitoring & Evaluation	<p>1. We welcome the greater focus on monitoring and evaluation of the plan. Evaluation by the NBF is important and we view them as a forum in which to evaluate the scientific, social, governmental, and cultural outcomes of the NBAP, with the scientific evaluation (independently carried out) as one input into their overall evaluation. However, there is currently a lack of capacity for robust evaluation of the NBAP actions and their impact. We welcome the call for an independent scientific evaluation – however we question whether the NBF is the appropriate scientific body to carry this out. The NBF is comprised of a minority of scientists with the bulk of the membership being other important stakeholders in biodiversity and its management. All members of the NBF are there in a voluntary capacity and are not paid for their time and not provided with additional resources for evaluation.</p> <p>2. If the NBF is to be responsible for independent auditing of the actions then its composition must reflect the skills and expertise needed for this task and/or the auditing role may need additional skills to be added.</p>	<p>1. An independent scientific review of the NBAP will require additional resources to be provided to enable the NBF to commission evaluations of different dimensions of the plan.</p> <p>2. Terms of reference for the auditing/evaluation will need to be developed and agreed and should be added as an action in the “Monitoring & Evaluation” section. Potential for synergies and conflicts with climate action policy should be identified in this evaluation (e.g., see Gorman et al. 2022¹).</p> <p>3. Key monitoring mechanisms need to be connected with indicators of actions.</p> <p>4. Add another section to the “monitoring and evaluation” part of the plan that deals with adaptive responses to monitoring.</p>

¹ Courtney E. Gorman, Andrew Torsney, Aoibheann Gaughran, Caroline M. McKeon, Catherine A. Farrell, Cian White, Ian Donohue, Jane C. Stout, Yvonne M. Buckley, “Reconciling climate action with the need for biodiversity protection, restoration and rehabilitation”, *Science of The Total Environment*, Volume 857, Part 1, 20 January 2023, <<https://www.sciencedirect.com/science/article/abs/pii/S0048969722064154>>, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
	<p>3. There needs to be a stronger justification of what the purpose of monitoring is – what will happen if monitoring shows that something is not going well? Is there a mechanism for adapting to the results of the monitoring? Over what timeframe can adaptations to the results of monitoring be made? Every 5-7 years or within the timeframe of the NBAP? While there is some acknowledgement of the need for adaptability in response to monitoring there is no mechanism explicit within the framework (P16/17) for re-evaluation of actions or redirection of funds in response to monitoring results. Without this mechanism there is a real risk that results from monitoring and evaluation will not be acted on. Monitoring alone will not solve the implementation challenge, monitoring needs to be linked to actions. For example, “If monitoring shows x, then y will be initiated”. On P18 the response to monitoring is not mentioned.</p>	
<p>Objective 1 - Adopt a Whole of Government, Whole of Society</p>	<p>1. We welcome the annual report to the Cabinet Committee on the Environment and Climate Change as an action, this will help with accountability. However, the role of the Biodiversity Working Group as stated here (p20) is weak “can examine interlinkages between</p>	<p>1. There needs to be an outcome around accountability of members of the BWG for the actions they are assigned and mechanisms for ensuring that members adequately report and evaluate the actions they are responsible for.</p>

Subject	Analysis/Critique	Recommendations
<p>Approach to Biodiversity, pp. 20-27</p>	<p>policies and departmental actions.” Members of the BWG have a strong role to play in implementing actions, monitoring, and evaluating outcomes and determining the consequences of failure to achieve targets and outcomes. The BWG collectively should be held accountable for failure to reach targets and implement actions as all action owners should be part of this group.</p> <p>2. <i>Action 1B2, p. 23</i>: The Biodiversity Working Group is a critical part of implementation of the NBAPs and is accountable for achievement of the actions. How will the Cross-Department Biodiversity Working Group (est. 2012) function with the proposed All-Island NESC working groups?²</p> <p>3. Current members of the National Biodiversity Forum are also members of the AICBRN but do not have a remit to represent AICBRN within the NBF.</p>	<p>2. There is a need for transparency on the role of the Biodiversity Working Group in the 4th NBAP. Add to the NBAP the Terms of Reference for the BWG, how often it meets, what has been achieved and the availability of minutes.</p> <p>3. An AICBRN representative should be formally invited to sit on the National Biodiversity Forum.</p>
<p>Objective 2 - Meeting</p>	<p>1. <i>Outcome 2A, p. 29</i>: large landholders and land managers in the State (Local government,</p>	<p>1. Clear targets and outcomes to be set for large state landowners and managers that they must achieve in addition to or even instead of current economic</p>

² National Economic & Social Council, Council Report, No.156, October 2021, “Collaboration on Climate and Biodiversity: Shared Island as a Catalyst for Renewed Ambition & Action”, pp. vii-viii, <http://files.nesc.ie/nesc_reports/en/156_shared_island_cbd.pdf>, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
<i>Urgent Conservation and Restoration Needs, pp. 28-47</i>	<p>Coillte, Bórd na Móna, OPW) should be held to clear targets for conservation & restoration by the NBAP. State and semi-state actors need to be seen as leading the conservation and restoration of sites within their own control, in a way that is similar to the public sector being mandated to lead on climate action.</p> <p>2. <i>Action 2B9, p. 34</i>: no clear target for “increase in native tree planting”. There also needs to be a constraint stated here that afforestation will not take place on lands where the biodiversity values are dependent on maintaining the current habitat (e.g., semi-natural grassland, peatlands etc.). Afforestation for carbon needs to be consistent with biodiversity values (see Gorman et al. 2022³).</p>	<p>dividends. An ecosystem accounting framework can enable the quantification of non-market ecosystem services provided by appropriate land management.</p> <p>2. Add a quantitative target for the “increase in native tree planting” and indicate that it will only take place in areas appropriate for trees to increase biodiversity values.</p>
<i>Objective 5 - Enhance the</i>	<p>1. There is currently a lack of capacity for compiling and curating a robust evidence base</p>	<p>1. Add an action as follows: “A research hub for climate and biodiversity action be established to systematically review, synthesise and build the evidence base for</p>

³ Gorman et al, “Reconciling climate action with the need for biodiversity protection, restoration and rehabilitation”, Volume 857, Part 1, 20 January 2023, <<https://www.sciencedirect.com/science/article/abs/pii/S0048969722064154>>, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
<p><i>Evidence Base for Action on Biodiversity, pp. 65-71</i></p>	<p>for many of the actions. The compiling of evidence is not systematic and is not focused. The capacity to add to the evidence base is scattered throughout government departments, individual research organisations and academic institutions. Without curation of the evidence base it is fragmented, difficult to find and often inaccessible. We call for new mechanisms that enable a strong evidence base to be built and curated for the implementation of existing and potential future solutions to the joint challenges of biodiversity and climate, good examples exist of systematic evidence review, e.g. Conservation Evidence at the University of Cambridge.⁴ The AICBRN commits to coordinating funding proposals that strengthen the evidence base for integrated climate and biodiversity action and suggest that an action be added to the plan as set out in the corresponding Recommendations.</p> <p>2. <i>Action 5A1, p. 66</i>: Future skills needs should be front loaded. Waiting until 2026 to undertake a skills gap analysis on future skills needed to address the biodiversity crisis represents a large delay. It should be one of the first things undertaken, so that funding can be directed</p>	<p>climate and biodiversity action to support the national climate objective and biodiversity ambition”. The AICBRN will be named as an action contributor, however key funding stakeholders should be named including: HEA, NPWS, EPA, SFI, DAFM etc. to ensure that appropriate funding vehicles are put in place to enable this action.</p> <p>2. Undertake a skills gap analysis as a matter of priority and direct resource to support training at 3rd and 4th levels.</p> <p>3. Explore how the AICBRN gap analysis can be exploited or built upon to help fast track research priorities.</p> <p>4. AICBRN to consult with relevant government bodies to help prioritize research to fill evidence gaps.</p>

⁴ Cambridge Conservation Initiative, <<https://www.cambridgeconservation.org/>>, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
	<p>quickly to address those gaps, rather than wait four years to deliver this action. The AICBRN could deliver this skills gap given its academic focus.</p> <p><i>3. Action 5A2, p. 66:</i> Biodiversity research gaps for supporting conservation and restoration are identified and prioritised. The AICBRN has recently undertaken a gap analysis in the Climate and Biodiversity domains. This could be expanded to address this issue quickly and avoid reinventing the wheel. The indicators here reflect competitive research at the international scale, which is outside the control of academics undertaking the research and government agencies responsible for identifying the research needs. It is dependent on the academic research community aligning their research with the research needs in competitive and international programmes over which government does not have full control.</p> <p><i>4. Action 5B1, p. 67:</i> Formal representation by AICBRN on the NBF would help inform ongoing conservation needs assessments.</p> <p><i>5. Action 5B2, p. 67:</i> Data describing monitoring data should also be available to the academic</p>	

Subject	Analysis/Critique	Recommendations
	<p>sector for the purposes of research. Avoid the monetisation of this data for research purposes.</p> <p><i>6. Action 5B3, p. 67:</i> Ensure that the OPW collection of biodiversity data is appropriate, i.e., sufficiently well resolved and standardized in a way that makes it useful to answer ecological questions regarding the drivers of biodiversity change. Some exploration and application of how AI and remote sensing data might help to standardize collection of such data would move data collection to a scale that was commensurate with environmental data quantifying the physical environment.</p> <p><i>7. Action 5C1, p. 68:</i> The periodicity of monitoring is not described and is not without resource implications. Frequent monitoring will be more expensive, but trends are only detectable with frequent sampling. The scale and scope of what is to be sampled is not clear, e.g., biodiversity of insects, birds, vascular plants, or annex IV habitat or species distribution and status? Site based monitoring is indicated, but no detail is provided describing which groups will be studied.</p>	

Subject	Analysis/Critique	Recommendations
	<p>8. <i>Action 5C2, p. 68</i>: Lack of clarity over which government departments will be involved. Responsibility for biodiversity is cross sectoral and some departments will be more involved than others. To increase accountability, be explicit about which government departments are expected to be key actors here.</p> <p>9. <i>Action 5C3, p. 68</i>: Lack of detail describing which organisations will be responsible for implementing citizen science schemes and programmes. What are the relevant organisations for monitoring the activity? Citizen science programmes need to be led, and no clear lead organisations to collate and implement are identified.</p> <p>10. <i>Action 5D1, p. 70</i>: The AICBRN is an existing network combining expertise across the biodiversity and climate domains that could provide the natural capital and ecosystem accounting expertise needed for the national assessment of ecosystems services. There is a duplication of effort here in establishing a parallel All-Island network. Avail of the expertise in the AICBRN and expand upon the networks activity to deliver this action.</p>	

Subject	Analysis/Critique	Recommendations
Current State of Actions	<p>The 3rd NBAP Report had 119 actions and 4th report references 98 of these as ongoing, eight implemented, and 13 limited/not progressed.</p> <p>It is not clear from this action plan which actions are carry overs from previous plans (because they weren't achieved in an earlier plan), and which are new plans unique to the 4th NBAP.</p>	<p>Some detail on actions not progressed or current state needs to be included in the plan. For example, <i>Actions 2A1 and 2A2 (p. 29)</i> would benefit from overall statements of current state.</p> <p>Continuity needs to be strengthened throughout. A traffic lighting system could be introduced for the actions, based on whether they are carry overs from the previous NBAP if they haven't been actioned.</p>

3. COMMENTS ON THE INTERLINKAGES BETWEEN CLIMATE AND BIODIVERSITY

Subject	Analysis/Critique	Recommendations
Introduction, pp. 3-6	<p>The interconnectedness of the climate and biodiversity crises should be highlighted in the introduction. For example see: IAP Statement (2021)⁵ where policy responses are outlined that will lead to benefits for both climate and</p>	<p>1. Include a statement on the interconnectedness of the climate and biodiversity crises in the introduction to the plan. Use policy recommendations from the IAP statement⁷ to demonstrate how climate and biodiversity action can be aligned and where biodiversity action is essential to achieving the national climate objective.</p>

⁵ Royal Irish Academy (RIA), InterAcademy Partnership (IAP) Statement (2021), 'Climate change and biodiversity interlinkages and policy options – Relevance to Ireland', <https://www.ria.ie/sites/default/files/iap-statement_2021-climatechange-and-biodiversity-interlinkages-and-policy-options-relevance-to-ireland.pdf>, accessed 7th November 2022.

⁷ RIA, IAP Statement (2021), 'Climate change and biodiversity interlinkages and policy options – Relevance to Ireland', <https://www.ria.ie/sites/default/files/iap-statement_2021-climatechange-and-biodiversity-interlinkages-and-policy-options-relevance-to-ireland.pdf>, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
	biodiversity action. Also see Gorman et al. 2022 ⁶ for an analysis of biodiversity considerations of climate action in Ireland.	2. In the introduction the NBAP should explicitly recognise that a vision for a “biodiversity rich” outcome is stated in Ireland’s national climate objective and that national climate action plans should be held to account for achieving this outcome. This is a legislative basis for action on biodiversity. Further legislative basis for the NBAP could build on this step, with the NBAP contributing to the national climate objective as well as the conservation and restoration of biodiversity for other reasons.
Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity, pp. 20-27	<i>Outcome 1E, p.27:</i> we encourage recognition of the obligation to ensure a “biodiversity rich” country as per the national climate objective. ⁸ It is unclear however what “biodiversity rich” entails in practice. There is obviously a role of the NBAP in ensuring this is achieved but more work needs to be done to connect biodiversity to the national climate objective. The NBAP should be mandated to achieve the “biodiversity rich” part of the national climate objective. Some of the outcomes in the NBAP are clear e.g., outcome 2A target 4, outcome 2C, others are vague using words such as strengthened, enhanced etc.	The NBAP needs very clear objectives that will achieve a “biodiversity-rich” economy; what does this look like? Identify clear biodiversity indicators (Habitats & Birds Directives reporting, species threat status, ongoing monitoring programmes for key habitats and species etc.) and ambitions for where they should be by the end of the 4th NBAP period.

⁶ Gorman et al, “Reconciling climate action with the need for biodiversity protection, restoration and rehabilitation”, Volume 857, Part 1, 20 January 2023, <<https://www.sciencedirect.com/science/article/abs/pii/S0048969722064154>>, accessed 7th November 2022.

⁸ Climate Action and Low Carbon Development (Amendment) Bill 2021, <file:///C:/Users/Administrator/Downloads/127957_ab70a65d-68c1-4947-983b-babf920cc4dc.pdf>, pp. 7-8, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
<p>Objective 2 - Meet Urgent Conservation and Restoration Needs, pp. 28-47</p>	<p>1. <i>Outcome 2E, p. 41</i>: This outcome is weak with just two targets and two actions. There is considerable work that needs to be done to identify desired states for restoration/rehabilitation, sites identified with restoration/rehabilitation potential and the evidence base for restoration/rehabilitation built up in an Irish context and in the context of a changing climate. Consideration needs to be paid to the changing nature of habitat baselines with climate change and the need for research on achievable states for habitat restoration projects.</p> <p>Restoration/rehabilitation may be done to mitigate or adapt to climate change (i.e., Nature-based Solutions), sustainable and biodiversity rich N-bS should be referenced as an action.</p> <p>2. Surprisingly no interim dates are included for any of the actions and indicators for all IAS targets (only 2030).</p>	<p>1. Add an action for a review of protected areas to determine the network's effectiveness under likely climate change scenarios. This should inform the selection of new areas for designation. The AICBRN can be named as a contributor to this action.</p> <p>2. <i>Outcome 2D, p. 39-40</i>: special consideration should be paid to species at risk of extinction due to climate change, including species which are currently relatively common or widespread, but which may become threatened in the future. Biobanking, seed banking and tissue banking initiatives may be much more effective if genetic diversity is conserved prior to declining status.</p> <p>3. <i>Outcome 2E, p. 41</i>: a review of current restoration projects is needed. Establishment of a restoration/rehabilitation evidence base which is openly accessible to all including community groups etc is needed to inform future efforts.</p> <p>4. <i>Action 2G3, p. 47</i>: there should be action on horizon scanning and implementation of pre-border management for potential new IAS, particularly in the context of climate change where recipient habitats may become more suitable for a wider range of IAS.</p> <p>5. Specify time-bound targets and actions in the short-medium term as well as long-term.</p>
<p>Objective 4 - Embed Biodiversity at</p>	<p>1. <i>Outcome 4A, p. 61</i>: None of the actions in 4A address ecosystem services. We need a better understanding of how biodiversity and abiotic</p>	<p>1. There needs to be an explicit statement in the introduction of the contribution that biodiversity and nature-based solutions can make to climate change mitigation and adaptation. There should be a strong statement that implementing</p>

Subject	Analysis/Critique	Recommendations
<p><i>the Heart of Climate Action, pp. 60-63</i></p>	<p>environment combine to determine ecosystem service supply, in order to assess the risk of ES depletion due to CC.</p> <p>2. <i>Action 4A2, p. 61</i>: How is the research evidence-base to be strengthened (vague) with an achievement indicator of “A more robust evidence-base of the current and future impacts of climate change on biodiversity” Where is this evidence-base logged and assessed for monitoring and implementation?</p> <p>3. <i>Action 4A3, p. 61</i>: Q3 report to the minister suggests that the action might be outdated already, is this a typo?</p> <p>4. <i>Outcome 4B, p. 62</i>: Climate change adaptation and mitigation measures contribute, where practical, to biodiversity and ecosystem conservation.</p> <p>This section lacks ambition and is rather weak relative to the urgency and importance of the climate change mitigation and adaptation needs. See Gorman et al. 2022⁹ for a recent assessment of the integration of biodiversity</p>	<p>the other actions in the NBAP which will strengthen the resilience of ecosystems and the protection of species and habitats are integral to lessening the overall impact of climate change on society and the economy. Actions taken to support biodiversity will prevent or slow down impacts of climate change on ecosystem services.</p> <p>2. <i>Outcome 4A, p. 61</i>: mitigation of risks to ES supply will require work to be done on mapping natural capital and its contribution to Ecosystem Services, this work should be incorporated into the national land use plan. Scenario analysis for ecosystem services under climate change should be undertaken. Management plans for the maintenance of ecosystem services need to be put in place and coordinated with the protection of land for biodiversity and the restoration of ecosystems.</p> <p>3. <i>Action 4A2, p. 61</i>: AICBRN coordinated research could deliver a robust evidence base of the current and future impacts of climate change on biodiversity; particularly, if we were to take a systematic approach similar to the one adopted by Bill Sutherland and the Conservation Evidence unit he has established. That alone is not enough, there needs to be an opportunity for the research community to then use that evidence and do something creative with it in an exploratory way, e.g., synthesis groups that work with the information generated.</p> <p>4. <i>Action 4A2, p. 61</i>: the evidence-base should be made easily available to citizens and organisations – for example see</p>

⁹ Gorman et al, “Reconciling climate action with the need for biodiversity protection, restoration and rehabilitation”, [Volume 857, Part 1](https://www.sciencedirect.com/science/article/abs/pii/S0048969722064154), 20 January 2023, <<https://www.sciencedirect.com/science/article/abs/pii/S0048969722064154>>, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
	<p>contributions into climate action in an Irish context. It is unclear how the three actions represent the further ambition needed.</p> <p>5. <i>Action 4B1, p. 62</i>: Identifies a single type of habitat for restoration and the creation of habitat. What about woodlands, saltmarshes, linear features such as hedgerows and riparian strips in farmland? Is the problem that no single body can be identified to take those on?</p> <p>Bórd na Móna are well on their way towards peatland restoration anyway. The action lacks ambition and is hard to prove – as it takes decades for ecosystems to be rehabilitated. The target states this will be done by 2026. The stated metrics to assess seem reasonable, but reflooding a site does not equate to rehabilitation.</p> <p>6. <i>Action 4B2, p. 62</i>: We welcome the commitment for OREDP II to include Biodiversity representatives. It is however unclear how many and how they will be identified. Will representatives have a genuine voice if they are joining the process in later stage? How do you ensure that biodiversity experts have a voice that is heard? The reconciliation of climate and</p>	<p>https://www.conservationevidence.com/ for a fully searchable and referenced evidence base for conservation.</p> <p>5. <i>Action 4A3, p. 61</i>: AICBRN to contribute to this review and score government performance in the National Adaptation Framework.</p> <p>6. <i>Outcome 4B, p. 62</i>: set more ambitious targets and appropriate actions, draw on evidence on integrating biodiversity into climate action for clear actions that can be taken.</p> <p>7. <i>Action 4B1, p. 62</i>: identify other Nature-based Solutions incorporating biodiversity into climate action (e.g., see Gorman et al. 2022¹⁰), such as restoration of other high carbon habitats (woodlands, hedgerows, riparian strips, saltmarshes, permanent high nature value grassland).</p> <p>8. <i>Action 4B2, p. 62</i>: AICBRN and NBF to recommend appropriate biodiversity experts and provide a link back to the AICBRN and NBF to ensure appropriate offshore development for biodiversity and climate action.</p> <p>9. <i>Outcome 4C, p. 63</i>: specify outcomes for both climate change mitigation and adaptation.</p> <p>10. <i>Outcome 4C, p. 63</i>: strengthen these actions, for example legislation that mandates the implementation of NbS through government bodies and local authorities.</p>

¹⁰ Ibid.

Subject	Analysis/Critique	Recommendations
	<p>biodiversity action and a just transition are key interests of members of AICBRN.</p> <p>7. <i>Outcome 4C, p. 63</i>: the title references only climate change adaptation whereas some of the actions are more relevant to climate change mitigation.</p> <p>8. <i>Action 4C1, p. 63</i>: This is simply an audit of actions that are being undertaken by a range of other bodies. It does not drive the action or implementation of Nature-based Solutions. Climate Action Regional Offices will only 'promote' NbS, it needs to be stronger than this.</p> <p>9. <i>Action 4C2, p. 63</i>: The restoration programmes for saltmarshes are assessed by expenditure, not by results of habitat created. Other metrics refer to the area of the programme, not of new habitat created. This could also fall under Outcome 4B in general through the creation of new habitat. DHLGH will only promote, not legislate for NbS.</p> <p>10. <i>Action 4C3, p. 63</i>: Raised bog restoration an audit and review of the Raised Bog Special Areas of Conservation Management Plan. What are the consequences of the review? If action is</p>	<p>11. <i>Action 4C3, p. 63</i>: commit to implementing results of the review of the Raised Bog Special Areas of Conservation Management Plan.</p>

Subject	Analysis/Critique	Recommendations
	recommended by the review, will it be implemented?	
Objective 5 - Enhance Biodiversity at the Heart of Climate Action, pp. 65-71	1. <i>Action 5A2</i> : There is a role here for AICBRN in identifying relevant research gaps, as well as other potential contributors. Whose responsibility is it to coordinate this action? Who decides on the priorities? What is the process? Who is the action owner?	1. A research needs prioritisation should focus on the value of the information needed – identification of areas where knowledge is critical for improved performance.

4. MORE DETAILED COMMENTS

Subject	Analysis/Critique	Recommendations
Introduction	Needs better referencing to ensure that a robust science base is demonstrated. E.g., “95% of land surface modified by activities such as...”, “resulting in very significant declines in the population sizes...” are unreferenced.	

Subject	Analysis/Critique	Recommendations
	<p>Biodiversity change, not just loss, is important. For example, the invasion of non-native species changes the communities that are invaded and can indeed change the ecosystem, even if the invader is at low abundance and has not yet led to biodiversity loss. The introduction of non-native species can actually increase biodiversity (adding additional species to the community) but the long-term consequences of this biodiversity change can be severe for ecosystem function and species loss in the long-term. The disturbance and reassembly of communities into different states is biodiversity change but not necessarily loss of species. The change in community or ecosystem state could be important for ecosystem service delivery and the maintenance of threatened populations. I suggest that biodiversity loss and change be referred to together.</p>	

Subject	Analysis/Critique	Recommendations
Objective 1 - Adopt a Whole of Government, Whole of Society Approach to Biodiversity, pp. 20-27	<p>1. <i>Action 1C4, p. 24</i>: “other policy areas” is too broad.</p>	<p>1. <i>Action 1C4, p. 24</i>: call out priority policy areas such as marine, agriculture, climate, infrastructure development, forestry, tourism etc.</p> <p>2. <i>Action 1D4, p. 25</i>: wording here should be changed to terrestrial and ‘aquatic’ (marine and freshwater) biodiversity to highlight the importance of freshwaters.</p>
Objective 2 – Meet Urgent Conservation and Restoration Needs, pp. 28-47	<p>1. <i>Action 2A8, p. 30</i>: while <i>ex situ</i> conservation measures can be important, they should not be perceived as (or actually) replacing or detracting from the primary focus of conservation measures which should be <i>in situ</i>.</p> <p>2. <i>Action 2A8, p. 30</i>: aquaria are mentioned but action ownership not detailed. What about freshwater biodiversity e.g., Crayfish Arks?</p> <p>3. <i>Action 2A9, p. 30</i>: are both 8 and 9 an acceptance of in-situ extinction? Is Dublin Zoo in an urban setting the right place for this initiative (space wise) - why not Fota?¹¹</p>	<p>1. <i>Action 2A8, p. 30</i>: highlight freshwater biodiversity also.</p> <p>2. <i>Outcome 2B, p. 32</i>: need to add “restored and resilient to future threats including climate change” to read “biodiversity and ecosystem services in the wider countryside are conserved, restored and resilient to future threats including climate change”.</p> <p>3. <i>Action 2B1, p. 32</i>: Riparian needs to be mentioned specifically to highlight its significance.</p> <p>4. <i>Action 2B3, p. 33</i>: State what the current % of farmland with biodiversity rich landscape features and review targets for biodiversity rich landscape features.</p>

¹¹ Fota Wildlife Park, <[Home - Fota Wildlife Park](#)>, accessed 7th November 2022.

Subject	Analysis/Critique	Recommendations
	<p>4. <i>Action 2A10, p. 31</i>: Údarás na Gaeltachta is singled out. What about other land model targets – Local Area Plans / Landscape Characterisation Assessments / Tidy Towns?</p> <p>5. <i>Action 2B3, p. 33</i>: an “organic farms target of 7.5% and at least 4% of agricultural land has biodiversity rich landscape features by 2030” – this is a lamentably low target. Are these low targets consistent with the new CAP and if so, can they be increased through other measures?</p> <p>6. <i>Action 2B4, p. 33</i>: pesticides to be reduced by 50% relative to an established baseline. Needs clarity on the baseline, how, when and by whom is it set?</p> <p>7. <i>Action 2B6, p. 33</i>: the NBAP states Implement a peatland strategy - this doesn't seem sufficient.</p> <p>8. <i>Action 2B13, p. 34</i>: seems vague. Where are numbers/extent of projects being logged/monitored?</p>	<p>5. <i>Action 2B4, p. 33</i>: specify the baseline, who defines the baseline and when it is set.</p> <p>6. <i>Action 2B13, p. 34</i>: revise the target and actions to be more specific.</p> <p>7. <i>Action 2B14, p. 34</i>: clarify the additionality of these actions and add an obligation to trial NbS for flood mitigation.</p> <p>8. <i>Action 2G3, p. 47</i>: a stronger emphasis on appropriate management of invasive species across all protected areas.</p> <p>9. <i>Action 3C8, p. 57</i>: there is an urgent need for an independent review of the biodiversity impact of Origin Green and recommendations for the future.</p>

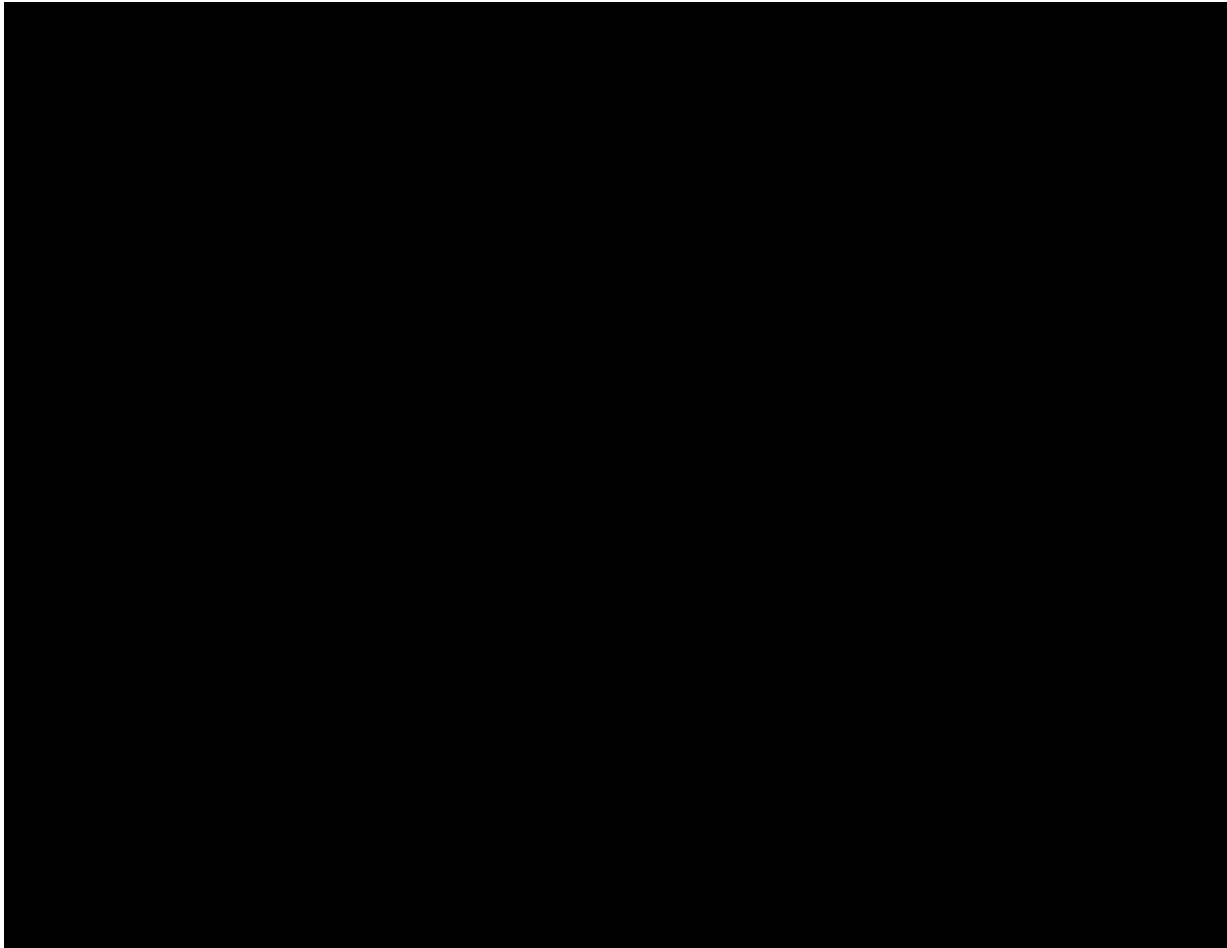
Subject	Analysis/Critique	Recommendations
	<p>9. <i>Action 2B14, p. 34</i>: is the OPW being tasked with natural flood management assessment? Is this appropriate? It is unclear how these actions go beyond what OPW is currently doing. There are no obligations for OPW to implement any Nature-based Solutions to flood management.</p> <p>10. <i>Action 2B15, p. 35</i>: The OPW currently assesses for initial drainage and maintenance implications for biodiversity – so what exactly changes?</p> <p>11. <i>Outcome 2C, p. 36</i>: the NBAP repeats RMBP material – this does not seem sufficient.</p> <p>12. <i>Action 2G1, p. 47</i>: “Establish an invasive alien species (IAS) unit in DHLG” – why no date for establishment given, just a 2030 target? No interim dates for actions and indicators for all IAS targets (only 2030).</p> <p>13. <i>Action 2G3, p. 47</i>: “remove stands of invasive species from native woodlands and peatlands within Protected Areas and National Parks”. Why is this restricted to woodlands and peatlands?</p>	

Subject	Analysis/Critique	Recommendations
	<p>Why are grasslands and aquatic environments excluded?</p> <p>14. <i>Action 3C8, p. 57</i>: it is unclear whether and how Origin Green is contributing for biodiversity.</p>	
<p>Objective 4 - Embed Biodiversity at the Heart of Climate Action, pp. 60-63</p>	<p>1. <i>Action 4B2, p. 62</i>: OREDP II plan will include Biodiversity representatives. How many, how identified? Open Call, M/F, N/S, sectoral? Perhaps an AICBRN role here?</p> <p>2. <i>Action 4B3, p. 62</i>: how can monitoring agriculture bioenergy sources maximise biodiversity benefits and minimise negativity? What sort of monitoring?</p>	
<p>Objective 5 – Enhance the Evidence Base for Action on Biodiversity, pp. 65-71</p>	<p>1. <i>Action 5A2, p. 66</i>: surely the 4th NBAP should identify national biodiversity research priorities? Why is 'Publication of national biodiversity research priorities' a sub-action under an objective?</p> <p>2. <i>Action 5A3, p. 66</i>: national inventory of funding opportunities - who owns this action? Timeline?</p>	<p>1. Many of these targets could clearly be the core work plan in an SFI Climate/Biodiversity Hub application.</p> <p>2. <i>Action 5A1, p. 66</i>: "identify biodiversity skills gaps" – an AICBRN hub member could participate in this application to EGFSN. Action ownership currently only identified as 'relevant organisations'</p> <p>3. <i>Action 5A3, p. 66</i>: a potential task that AICBRN could draw together.</p>

Subject	Analysis/Critique	Recommendations
	<p>3. <i>Outcome 5B, p. 67</i>: citizen science is currently implemented sporadically north and south and needs a national framework to strengthen and supports clearly identified.</p> <p>4. <i>Action 5B1, p. 67</i>: the NBF is referred to as a research organisation – as far as I’m aware NBF does not conduct research. This action is very vague, and it is not clear who has responsibility for this. How will prioritisation of conservation needs assessment be done and resources allocated?</p> <p>5. <i>Action 5B5, p. 67</i>: there is no real justification for this list of research projects, e.g., “horticulture” and why they are priorities for biodiversity. It reads as a shopping list of projects that are already planned or underway.</p> <p>6. <i>Outcome 5C, p. 68</i>: “The valuable contributions from citizen science programmes and volunteer data projects will also be supported” does not include any detailed identification of such supports.</p>	<p>4. <i>Outcome 5B, p. 67</i>: standardise data collection approaches including citizen science.</p> <p>5. <i>Action 5B1, p. 67</i>: there should be a dedicated project to determine conservation needs of various stakeholders mentioned in the NBAP.</p> <p>6. <i>Action 5B3, p. 67</i>: it would be more helpful to identify key biodiversity data sources that should be provided by particular time points rather than specifying particular organisations will make their datasets available. Surely we should have consensus around what data is needed and then mandate particular organisations/agencies to have responsibility for supplying them. For example, “Habitat maps at x resolution to be made freely available by DATE”.</p> <p>7. <i>Outcome 5D, p. 70</i>: We really need an assessment of what the data needs are for a national assessment of ES, what are the key data sets, are they available, where can they be accessed, what is the spatial resolution, can they be used? What are the gaps?</p>

Subject	Analysis/Critique	Recommendations
	<p>7. <i>Action 5C1, p. 68</i>: development of a programme is weak - it should be underway within the lifetime of this plan.</p> <p>8. <i>Action 5C3, p. 68</i>: “A more robust set of citizen science managed initiatives”. This is a vague KPI - who will deliver these and how will they be monitored?</p> <p>9. <i>Action 5D1, p. 70</i>: Natural Capital Ireland is already in existence and a network of experts already exists – why reinvent the wheel?</p>	
<p><i>Objective 6 - Strengthen Ireland’s Contribution to International Biodiversity Initiatives, pp. 73-77</i></p>	<p>1. P. 14: We welcome the highlighting of the importance of tackling biodiversity issues at an all-island scale and the need for enhanced partnerships for nature. The AICBRN was formed to provide exactly that all-island focus on tackling climate and biodiversity challenges together.</p> <p>2. <i>Outcome 6A, p. 74</i>: we welcome the support for the AICBRN.</p>	<p>1. <i>Outcome 6D, p. 77</i>: there should be a prioritised list of data contributions with progress measured as the proportion of these achieved.</p>

CONTRIBUTORS



To learn more about the All Island Climate & Biodiversity Research Network (AICBRN), please visit our [website](#) or [Twitter](#).

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08/11/2022

Dear Sir/Madam,

Please find below the BIM response to the 4th National Biodiversity Action Plan Consultation. For clarity and convenience, we have aligned our response to the questions posed in the online questionnaire.

Question 1. Do you think the Vision and Objectives capture the major themes/challenges that you see for biodiversity? In other words, if Ireland achieves these Objectives by 2027, would we have made significant progress towards addressing the biodiversity crisis?

BIM welcome the Vision and Objectives and support the robust ambition to address the biodiversity crisis. Having recently developed our new Corporate Strategy and assisting DAFM in developing the National Strategic Plan for Sustainable Aquaculture (NSPSA), we feel that there are already many examples of alignment to the draft National Biodiversity Action plan (NBAP). However, in terms of the detail supporting the objectives we have concerns that the significant role of the seafood sector in implementing this plan as it relates to the marine and coastal biodiversity is understated or absent. This is a key risk as the willingness of the seafood sector to engage with the NBAP will ultimately depend on the extent to which the new plan is perceived as a joint agenda.

Fisheries and aquaculture are a vital source of livelihoods, nutritious food, and economic opportunities, and has a key role to play in meeting one of the world's greatest challenges: feeding a population set to rise to 9.6 billion people by 2050. Biodiversity underpins fishers' and fish farmers' livelihoods. Biodiversity for fisheries and aquaculture is also indispensable for food security, nutrition, and the supply of many ecosystem services that support sustainable development.

In general, it is clear that BIM were absent from the stakeholder groups. As an agency it has strong client linkages with the seafood sector. Many of the actions aimed at business and farmer participation have potential to and, in some cases, already do extend to Seafood sector participation. This should be reflected, supported, and enhanced through amendments (text and tone) to the draft NBAP. To address this issue across the lifespan of the plan, BIM are seeking to join the Biodiversity Working Group. We feel our participation will ensure stronger engagement with the seafood sector and coastal communities.

Question 2. Do you have any comments on the Outcomes included under each Objective in the Draft NBAP? Do you feel that these Outcomes adequately address the Objectives under which they are situated? Do any additional outcomes need to be added to meet the objective?

BIM broadly agree with the outcomes proposed; however specific comments are included in relation to a number of outcomes below;

1B - This is critical outcome; however, we are very concerned with the paucity of recognition of the contribution of and potential to capture significant action and impact from the seafood sector. The bias towards the terrestrial in terms of the progressive reward-based change is in stark contrast to the compliance led enforcement driven language used in relation to the marine (outcome 2F). Our comments relating to specific actions below seek to redress this and strengthen the NBAP.

2F – This tone of this section on the Seafood sector is "stick" focused when compared with the "carrot" incentivisation in other outcome included under action 1C3 and in general within Objective 2. It is unbalanced and unfair to the seafood sector who have a contribution to make with data collection, observation and improving overall environmental performance given the correct supports.

It is inappropriate to exclude the Water Framework Directive from this outcome. This outcome description must be broadened to reflect the duty of Ireland as a Member States to conserve and restore their coastal and transitional waters to 'good ecological status' by 2027. MSFD does not have the same standards or recognition of protected areas (e.g., shellfish waters) as the WFD and thus this exclusion must be remedied. Coastal water improvement actions must be strengthened with additional actions added, specifically 2C3 and 2C4 need to be mirrored in this section.

3B and 3C – The link to health and wellbeing needs to be expanded beyond recreation to include physical health and nutrition. Fishers and aquaculture growers/ producers are dependent on healthy biodiversity for their existence and the key provisioning service of food. Their activities are deeply ingrained as part of their identities and roles within their communities. The FAO have identified food security as one of societies greatest challenges; feeding a population set to rise to 9.6 billion people by 2050. However, there are no references to food in these outcomes. Food supply (Terrestrial and Marine) is indivisible from the relationship between biodiversity, health and wellbeing. Further the role of biodiversity in supporting livelihoods enterprise and employment is critical when it comes to food systems. We suggest that the commentary supporting these objectives makes explicit reference to food and food security.

5C - strongly agree. BIM has researched the viability of Natural Capital Accounting for the seafood sector and are ready to contribute to further work on this topic at a national and regional level. A common approach and language with a good system for sharing data is really important to making this successful and enabling it to inform sound decision making.

Question 3. Are there any Actions in the Plan that you feel require amendment? Or indeed, are there additional actions needed? If additional actions are needed, who should implement these actions?

BIM's comments relating to specific actions are set out in the table below;

Action	Comment
1B2	BIM as the National Seafood Development Agency, feel that we can make an important and relevant contribution to the Biodiversity Working Group. We have strong linkages with the Seafood sector, manage grant schemes under the EMFAF, and a range of cross cutting/complimentary actions exist within our own work programmes as detailed in this submission. The willingness of fishery and aquaculture sectors to engage in the Biodiversity Action plan will ultimately depend on the extent to which the new plan will be perceived as a joint agenda. Fisheries and aquaculture do not appear to have had strong representation in the existing stakeholder groups and in an effort to find mechanisms to improve engagement BIM request that we be given a seat on the Biodiversity Working Group.
1B3	BIM has established a good working relationship with the NBDC especially in the area of Marine Invasive Alien Species, we hope to further strengthen that relationship across the lifespan of this plan.
1B4 - 1B6	Through the Coordinated Local Aquaculture Management System (CLAMS), aquaculture is organized at bay scale to engage with local authorities and specifically biodiversity officers. We seek engagement with DHLGH, local authorities and the Heritage Council in the development of biodiversity action plans.
1D3, 1D4 & 1D5	It would be useful to include the seafood sector and coastal communities within the scope of these actions.
1D8 & 1D9	BIM is well placed to engage directly with seafood businesses and encourage participation in the Business & Biodiversity Platform.
2A6 & 2B2	Farming for Nature initiatives could be expanded to aquaculture activities and inshore fishing. Examples include Native Oyster restoration and Lobster v-notching.
2B3	The scope of this action should be extended to apply to aquaculture. 100% salmon farming and almost 50% of mussel farming in Ireland is certified Organic in accordance with the EU Organic Regulations and the Irish Organic Food and Farming Standards.
2B6 & 2B8	These actions are dedicated to the implementation of sectoral strategies - the National Peatlands Strategy and the National Forest Strategy. Consideration should be given to action linking biodiversity to the Seafood OP and NSPSA.
2C3 & 2C4	These actions are strongly welcomed however we are concerned that coastal waters are not being prioritized adequately. We request that action 2C3 and 2C4 be replicated under outcome 2F. BIM will continue to encourage stakeholder engagement with water quality issues through its network of CLAMS groups

2F5 & 2F6	<p>The proposed Indicators for these actions fail to recognise that Ireland's ability to introduce national management measures is severely restricted by Article 11 of the CFP "Member States are empowered to adopt conservation measures not affecting fishing vessels of other Member States that are applicable to waters under their sovereignty or jurisdiction and that are necessary for the purpose of complying with their obligations under Article 13(4) of Directive 2008/56/EC, Article 4 of Directive 2009/147/EC or Article 6 of Directive 92/43/EEC". In practice this means that national management measures are generally confined to those stocks solely occurring inside the 6nm zone where other EU member states do not have access (See 2F8 below). The reality is that the great majority of CFP stocks management is not within Ireland's control, rather set at European level in cooperation with member and non-member states. In general Ireland has a small percentage of the fishing effort/catch for most CFP species, thus the indicator will not reflect national efforts to implement the CFP but rather the member states that have the majority of the quota share. Therefore, this could be perceived as setting the management authorities and the Irish fishing industry up for failure. This list of species should thus be limited to inshore species over which we have full national control and includes, inter alia, lobster, shrimp, velvet crab, whelk, cockle, razor, crayfish, spider crab and native oyster. The participation of industry is reduced 'to other relevant stakeholders' which does not reflect the participatory nature of the development of stock management measures, particularly in the inshore sector through the Inshore Fisheries Forums.</p>
2F7	<p>The indicator for this action is inappropriate in that it pre-supposes that the only pressure on qualifying habitats and species in the marine environment is fisheries and aquaculture. This indicator must be reconsidered in line with other pressures e.g., nutrient enrichment from UUWP's and land run off. Also, when compared to indicators in outcomes 2B and 3A, the tone is concerning. Nowhere is forestry or agriculture or tourism called out for causing significant adverse effects on protected sites or assigned an indicator for meeting SSCOs and a target of no significant adverse effects. Instead, the focus of these aspects is centered on enhancing performance and rewarding good practice. Alternative indicators in relation to seafood could focus on EMFAF projects supporting innovation to reduce impacts / improve performance, No. of seafood businesses engaged in Environmental Improvement projects e.g., certification schemes, projects contribution to protection and restoration- native oyster project, lobster v-notching, IAS projects etc.</p>
2F8	<p>The indicator as written is disproportionately focused on CFP regulatory enforcement and ignores the considerable body of national management measures that also needs to be enforced. These national management measures are primarily aimed at stocks which are primarily fished inside 6nm, and which have frequently been developed through a participatory process involving the fishing industry which has sought their introduction. This allows the development of a culture of compliance within the industry which needs to be nurtured and supported on an ongoing basis. The sole focus on enforcement of fisheries management measures misses the fact that fish and shellfish stocks are being adversely impacted by changing ocean conditions, and through impacts from pollution arising from agricultural runoff and insufficient Urban Wastewater Treatment. Alternative indicators could also be set around the number of seafood businesses engaged in improved environmental performance.</p>

2F10	BIM has seafood sector engagement initiatives such as CLAMS and Regional Inshore Fisheries Forums (RIFFs). We host sector specific events and also have strong individual client contacts across the sector. Various biodiversity initiatives e.g., IAS training, are already promoted but there is scope to build upon these in partnership with other departments and agencies. We are planning to continue these initiatives into the future and would be happy to link to the NBAP as appropriate.
2F11	BIM provide training to the seafood sector through our national seafood colleges and at targeted events, and also to schoolchildren via the Aquaculture Remote classroom. We are planning to continue these initiatives into the future and would be happy to link to the NBAP as appropriate.
2F12	All fishers and aquaculture producers are a potential data collection resource. Already the aquaculture industry is collecting environmental data, a small amount of which they supplied and were able to assist EPA in the latest assessment for Water Quality in Ireland 2016 – 2021
2G1 & 2G2	Actions welcomed and BIM would like to engage as appropriate.
2G4 & 2G6	BIM has worked together with relevant departments and agencies to develop a Risk Assessment & Biosecurity plan template for aquaculture businesses and assists DAFM in meeting its obligations in relation to the Aquaculture and Locally Absent species Regulations.
2G7	BIM support data collection on IAS in aquaculture areas through Shellfish Associated Species Inventories (SASI) and are working with NBDC to establish a mechanism to share the data wider. Education and Awareness building is an important aspect in the prevention and control of IAS but is not included in this section. An action to incorporate this would be welcomed.
3A2	Fishing and marine harvesting activities need to be included in this action. As an island nation these are integral to our identity and our relationship with biodiversity in the marine.
3C8	The seafood sector has been one of the most successful sectors in the uptake and retention of Origin Green membership, from primary producers with direct sales through to seafood processors.
4C2	Opportunity to work collaboratively and deliver an action in this section linked to the role of shellfish in supporting climate action and adaptation. Restoration of native oysters together with increased shellfish biomass can contribute a range of services and provide nature-based solutions.
5B5	We strongly agree with this action. Ireland is one of the world's most food secure nations, but we cannot rely on this into the future. Action mentions DAFM engagement with fishing communities in a national research forum, we look forward to hearing more about this proposal and would be happy to engage as appropriate.

Question 4. Biodiversity is not the responsibility of any single body or sector but requires engagement and partnerships across government and communities. As such, the NBAP seeks to promote a 'Whole of Government, Whole of society' approach to biodiversity in Ireland. In your view, what can be done to further promote public and community engagement around biodiversity under the NBAP?

The NBAP "Whole of Government, Whole of Society" approach completely misses the role and contribution of the seafood sector. This omission can be rectified as per the specific actions in Table 1. Of note is the minimal marine representation and consultation in drawing up the NBAP. This needs to be addressed through inclusion of marine agencies on the Biodiversity Working Group, sector representation on the National Biodiversity Forum and support for seafood sector participation on the Business for Biodiversity Platform as it becomes established.

Question 5. Are you (or your organisation) involved in any initiatives or work which could be relevant to the 4th NBAP (in terms of informing new actions, providing useful case studies, etc)? If so, please detail below.

Through its new internal strategy BIM is developing organisational capacity and resources for Biodiversity. To reflect all the above objectives, BIM will develop and activate solutions in response to biodiversity loss. We will do this by working together with the sector, and with local, national and EU sources of knowledge and funding. We have detailed some relevant initiatives in the area of management/restoration (Lobster V notching, native oyster restoration), education (Seafood colleges and ARC), engagement structures (CLAMS and NIFF/RIFF), IAS work programme and finally the fisheries technical work programme which focusses on gear selectivity and seafloor integrity.

Question 6. How can we ensure that the 4th NBAP delivers for biodiversity and is implemented successfully?

Communication and meaningful engagement with all sectors are key to the success of this plan. As stated, previously, the willingness of fishery and aquaculture sectors to engage in the Biodiversity Action plan will ultimately depend on the extent to which the new plan will be perceived as a joint agenda. This process must be participatory with all sectors treated equally particularly when considering incentives such as farming for nature. Strong positive communication will also support momentum of effort and encourages transfer of ideas and incentives between sectors.

We trust that you will consider our comments and our request to join the Biodiversity Working group. Also, if you have any queries regarding any of our comments, please do not hesitate in coming back to me.

Regards



Aquaculture Technical Manager

Firstly, well done on such a detailed document that is clear in its objectives, and more importantly, structured in an actionable and accountable manner that makes it comprehensive.

Below are a few suggestions for consideration, being made on my own behalf as a private individual:

- 1) There should be an all-party political agreement negotiated, committing all our political parties to adopting a very long term approach to tackling biodiversity loss and restoration. The agreement should embody a guaranteed commitment to properly funding and resourcing biodiversity issues both now and in the future. Biodiversity loss is not going to be remedied in the lifetime of any one government.
- 2) The government should support the European Commission's Nature Restoration Law.
- 3) The EU 2030 Biodiversity Strategy has set a target of 30% of land and 30% of sea to be established as protected areas and biodiversity corridors. All National, Regional and County Development Plans and zoning should adopt the target of 30% into their plans.
- 4) Each and every local authority should have at least one Biodiversity Officer on staff.
- 5) Appropriate Assessments should be reviewed and amended to include a new Biodiversity Improvement Plan for each new development. The current Environmental Impact Assessment seeks only to identify and mitigate impacts on biodiversity as one many considerations in an EIAR. But we should have a separate Positive Biodiversity Plan for each proposed development to ensure a Net Biodiversity Gain in each instance.
- 6) All environmental assessments and reports (EIAR's, NIR's, etc) produced for planning purposes should automatically be submitted to a central environmental data repository and utilised towards building a nationwide data resource.
- 7) Produce a simple guide of actions on farmland that can help reduce surface water run off of phosphates into the water course (creating attenuation pools, planting barrier trees and vegetation, using old drainage ditches to create strings of engineered pools connected through pipes to allow for the reduction of sediment before release to the water course, etc).
- 8) We should phase out the sale of mono-crop rye grass as the basic for grazing and introduce multi-seed sward varieties instead.
- 9) Expand agri-environmental schemes based on rewards for results to all farmers and not just those located in High Nature Value areas.

- 10) Ireland needs to establish a state of the art soil analysis laboratory that can conduct the full spectrum of microbial tests required to fully analyse, grade and record the very specific qualities of soils throughout the island. It's only by having local access to such a facility that we can truly start to build up a detailed local database of the true health of soil in Ireland and based on that start positive actions to improve soil quality all round.
- 11) Introduce a rewards for results payments scheme to farmers who achieve high quality levels with their soil.
- 12) Adopt the EPA's Catchment Wide approach to river / water quality management and engage with local community groups, from headland to estuary, to act as custodians for the sections of water flowing through their locality.
- 13) Review the 1945 Arterial Drainage act and amend it to ensure it is fit for purpose and aligned with the Habitats Directive. The destruction caused by heavy machinery interventions on river banks, for no reason other than the OPW being obliged under the law of the 1945 act to intervene and police their own interventions, needs to be addressed.
- 14) Based on the Catchment Wide approach, properly fund in-depth analysis of the hydromorphology of every water course in Ireland and secure significant funding for future planning and implementation of restoration and improvement of flood plains, reducing flow, introduction of riparian ways, installing sediment traps, etc. Improve the hydromorphology, help reduce flooding in settlement areas and significantly increase the opportunities for biodiversity to thrive along and in our waterways.
- 15) Immediately cease the dumping of untreated sewage into the streams, rivers and seas. Even if it means that the Council, in areas that are currently unable to treat their own waste, must pay to have the untreated sewage removed in sewage suction trucks and moved to another facility where the waste can be properly treated.
- 16) Wider public awareness campaigns about the Aarhus Convention and clearly inform the public that not only does it protect every person's right to live in a healthy environment, but it also guarantees the public three key rights on environmental issues.
 - a) their right to access information
 - b) their right to public participation in decision making
 - c) their right to justice, providing the public with access to independent judicial review procedures that are timely, equitable and not prohibitively expensive.
- 17) It could be argued that Fungi currently lack explicit legal protections. Given that they are fundamental to rich and sustainable ecosystems, their lack of recognition should be readdressed by including them in the classification of Flora, Fauna and Fungi.
- 18) Implement increased biosecurity protocols at ports of entry for the detection and removal of invasive species.

- 19) Implement tighter biosecurity regulations on the importation of invasive species for flora, fauna and fungi.
- 20) Significantly increase the number of third level course options and places for environmental sciences. Support these with promotional campaigns to encourage increased uptake. We will need to start training a lot more environmental scientists to meet what will be an inevitable increase in future expertise requirements for sustainability.
- 21) Encourage corporations to undertake Biodiversity Positive initiatives and projects through tax breaks and incentives.
- 22) Incentivise local communities, individuals and farmers to develop and expand a large network of urban and rural community gardens and allotments through tax breaks and incentives.
- 23) Encourage an expansion of eco-tourism through tax breaks and incentives
- 24) Produce a simple information booklet on the issues of biodiversity loss and simple positive actions that we can all take to help not only to halt but also to restore and reverse biodiversity loss. These booklets should be distributed to every household in the country.
- 25) Introduce a second metric into the vocabulary for the measure of our economy. GDP is already an established and universally used metric, so we cannot change that without throwing Ireland out of kilter with the rest of the world. But we can be one of the first to adopt our own national parallel measure, GDPE (Gross Domestic Product and Environment). Given that continual economic growth is fundamentally unsustainable without the degradation of our natural resources, which will ultimately lead to the collapse of world economies, it is essential that we start to consider a holistic approach to measuring growth and the long term benefits or perils of that approach.

In good conscience, we need to start measuring our wins and losses in the biodiversity battle and set them against the metrics of our economy so we can analyse if or when or how the two may be able to find a complimentary balance.

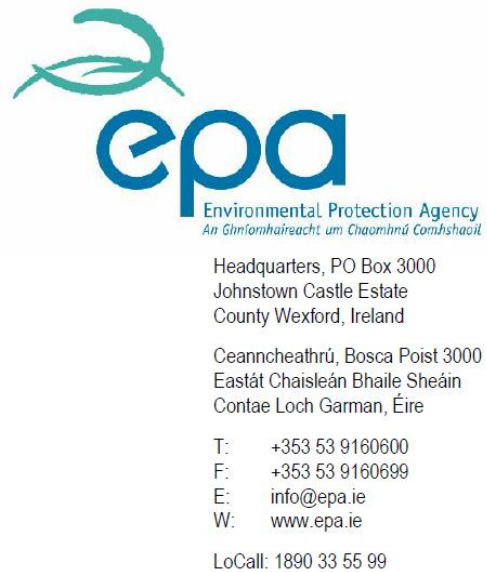
Thank you for taking the time to read, and the very best of luck with the action plan.

Email: NBAPConsultation@housing.gov.ie

4th National Biodiversity Action Plan Consultation
Biodiversity Policy, National Parks and Wildlife Service
Department of Housing, Local Government and Heritage
90 North King Street
Dublin 7, D07

Our ref: EPAC-2422

08 November 2022



Re: Public Consultation on Ireland's 4th National Biodiversity Action Plan

Dear Sir/Madam

The Environmental Protection Agency (EPA) welcomes the opportunity to comment on Ireland's 4th National Biodiversity Action Plan as part of the public consultation process by the Department of Housing, Local Government and Heritage. We have completed the online survey provided on gov.ie and include the EPA's response below, beginning with some general points for consideration and then moving into more specific observations on the Draft Plan.

Summary documents and Implementation Plan

In finalising the Plan consideration should be given to the preparation of:

- A summary version of the Plan for policy makers, and,
- A summary document for members of the public

In addition, consideration should be given to the preparation of a companion Implementation Plan to facilitate tracking of the Actions set out in the Plan. This could contribute to the development of the proposed robust Monitoring and Evaluation Framework.

Key considerations in the development of the Plan

On achieving greater coherence between biodiversity policy and other policy areas, consideration should be given to including a figure or a series of figures showing links between the Plan and other sectoral plans such as WFD RBMP. A schematic showing the hierarchy of biodiversity-related plans should also be included.

Second National Biodiversity Conference

The key relevant findings of the report of the Second National Biodiversity Conference should be reflected in the final Plan.

Objective 1 - Adopt a whole of Government, whole of society approach to biodiversity

The title page and the Foreword(s) to the Plan should reflect the commitment to all of government ownership of the Plan.

The title of the Plan should reflect the duration of the Plan i.e., 2023-2028.

The statutory basis of the Plan should be confirmed prior to its finalisation.

There would be merits in including a map of the territory which the Plan covers including the marine area in the introduction. There may also be merits in including a map(s) of SACs, SPAs, MPAs, NHAs, National Parks and Biosphere Reserves.

Consider establishing an all-of-Government Implementation Group with membership from the National Biodiversity Forum, Biodiversity Working Group, Citizens Assembly on Biodiversity Loss and relevant Government Departments.

The commitment to prepare an annual progress report on implementation of the Plan's actions is welcome. The presentation of this progress report to the Cabinet Committee on the Environment and Climate Change is a positive development.

The commitment to having a Biodiversity officer in each local authority is welcome as is the requirement for each local authority to have a Biodiversity Action Plan in place by the end of 2026. These Plans should be screened with respect to the requirements for SEA and Appropriate Assessment. Consideration could also be given to having a Biodiversity officer role in each of the three Regional Assemblies.

As the Introduction reflects themes explored in more detail in the report, the EPA's State of Environment Report, [*Ireland's Environment: An Integrated Assessment 2020*](#), could be cited in the Introduction (page 3) and included in the Reference section.

Outcome 1C: The root causes and key drivers of biodiversity loss are tackled by each responsible department

Under Outcome 1C, consider having a specific action around using outputs and data from environment and pollution monitoring programmes for the protection of protected habitats and sensitive ecosystems, such as the National Ecosystems Monitoring Programme (others could be listed as well such as WFD, MSFD etc.). These environmental monitoring programmes could also be relevant for input to **Action 2A2**: publish detailed site-specific conservation objectives for all SACs and SPAs.

Consider a specific action around further collaboration between DHPLG (i.e., NPWS) and other organisations on national environmental monitoring programmes that are relevant to habitat protection. For example, there is an MoU between EPA and NPWS on collaboration to set up the National Ecosystems Monitoring Network (NEMN).

Objective 2 - Meet urgent conservation and restoration needs

Outcome 2B: Biodiversity and ecosystem services in the wider countryside are conserved

Under Action 2B4 on measures to reduce pesticide use, this could also have an indicator to reduce impact on water quality and exceedances. It could also link to an action around a campaign for the disposal of old pesticides that might be a risk to wildlife.

Outcome 2E: a National Restoration Plan is in place to meet EU Biodiversity Strategy 2030 nature restoration targets.

There is merit in including a specific Target in relation to the preparation of a National Restoration Plan in accordance with the Nature Restoration Regulations. A target to have a Restoration Plan in place by the end of 2025 would seem reasonable and achievable. The Restoration Plan should be screened with respect to the requirements for Strategic Environmental Assessment and Appropriate Assessment.

Objective 3 - Secure nature's contribution to people

Outcome 3D: Planning and development will facilitate and secure biodiversity's contribution to people.

The Target to produce Guidance on best practice for biodiversity, green infrastructure and nature-based solutions in planning and development should also be captured as an Indicator. This could be integrated with the proposed "*SEA and Biodiversity, Flora and Fauna Guidance*" to be prepared by DHLGH under the SEA Action Plan 2021-2025.

Objective 4 - Embed Biodiversity at the heart of climate action

Outcome 4B: Climate change adaptation and mitigation measures contribute where practical to biodiversity and ecosystem conservation.

There would be merits in including a Target and related Action/Indicator associated with the implementation of the Peatlands and People LIFE project, as captured in the Climate Action Plan 2021- Action No. 22.

Objective 5 - Enhance the evidence base for action on biodiversity.

Outcome 5B: Data relevant to biodiversity and ecosystems, including conservation needs, is widely accessible and standardised.

We recommend changing Action 5B2 as follows in italics. "EPA will *explore the feasibility* of an integrated site and monitoring data solution to make data available relating to industrial consents and licences and associated monitoring data collected pre and post projects". It is considered this is a significant task and merits further discussion with the EPA to agree the scope and nature of the action. It will most likely involve a research project. There may be opportunities to explore a specific sector and pilot geographical area, which would be more achievable within the timescale specified, building on EPA initiatives in this area. In this context, the Target date for this action should be amended to 2027.

Outcome 5C - Long-term monitoring programmes are in place to guide conservation and restoration goals.

Action 5C1 states: 'A site-based monitoring programme to monitor changes in biodiversity over time will be developed'. More information would be useful here, as it is unclear whether this is a new programme or will incorporate existing relevant programmes such as under Article 17, WFD, NEMN etc. Also, there is no time frame or owner listed in the Draft Plan.

Action 5C2 refers to 'Collaboration across Government to support biodiversity monitoring will be enhanced, in particular to support the biodiversity-related reporting requirements for the WFD, MSFD, NECD, EU Biodiversity Strategy and the CBD'. This is a very broad action. Consider having one overarching action on collaboration across Government then subdivide the actions to cover the different monitoring programmes - for example NEMN is covered under the NECD that is mentioned.

Under Action 5C2, include reference to the Nature Restoration Regulation also.

Additional Actions could be included alongside the National Land Cover Map in relation to Habitat and Ecosystem Services mapping.

Consider moving Action 5C9, on priority invasive species, to under Outcome 2G relating to the control and management of invasive alien species.

Under the broad heading of Outcome 5, consider including an action to cover chemicals. It could be related to collaboration, enforcement of regulations, data sharing and monitoring of persistent organic pollutants, pesticides and other specific hazardous chemicals that are of interest for biodiversity protection, including data on monitoring in biota/wildlife and restrictions on certain chemicals. Consider establishing further collaboration between biodiversity and biota chemical monitoring and the descriptor on contaminants under MSFD and chemicals monitoring under the WFD. The enforcement aspect around chemicals could also be relevant to **Action 1E3** around resourcing to enforce environmental and wildlife legislation.

Outcome 5D: Ireland has prepared national assessments of ecosystem services and natural capital.

Actions 5D1 and 5D3 have different target dates for achieving the first national assessment of ecosystem services. The target date associated with 5D3 of 2027 would appear to be more achievable.

Outcome 5E: Biodiversity is mainstreamed across relevant research disciplines.

There may be merits in setting up a portal for biodiversity related EU LIFE projects, if not already available.

Objective 6 - Strengthen Ireland's contribution to international biodiversity initiatives

Outcome 6A: Science, policy and action on biodiversity conservation and restoration is effectively coordinated in an all-island approach.

Action 6A2 – Ireland has adopted an all-island approach to invasive species by 2025 – this could also be reflected under Outcome 2G in relation to Invasive Alien Species.

Action 6B1 states that: 'Ireland will enhance its engagement with EU and international biodiversity initiatives and research, e.g., EU Biodiversity Platform, CBD, OSPAR, RAMSAR and IPBES'. We recommend including a reference to EEA Eionet (Biodiversity and Ecosystems Groups). NPWS and EPA are active participants in these newly reformed European network groups.

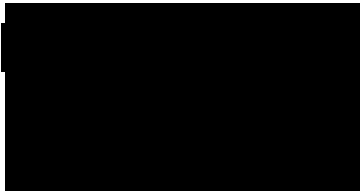
APPENDIX – SEA and AA Screening

The SEA screening for the Plan should, as appropriate, be undertaken in consultation with the relevant statutory environmental authorities. Where required, the SEA process should commence as early as possible in the Plan-making process.

The Table of all actions in the 4th NBAP should be referred to as Appendix 2.

The EPA looks forward to the adoption of **Ireland's 4th National Biodiversity Action Plan** and to working together with the Department, a strengthened NPWS, other partners and stakeholders towards its full implementation leading to a reduction of human-induced pressures on the environment and, ultimately, the restoration and conservation of nature in Ireland.

Yours sincerely

A large black rectangular box redacting the signature of the Programme Manager.

Programme Manager
Office of Evidence and Assessment