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**Re: Submission to Draft National Biodiversity Action Plan (NBAP)**

To whom it may concern:

The Irish Wildlife Trust (IWT) wishes to make a submission to the 3<sup>rd</sup> NBAP.

It is unfortunate that the consultation period for this important plan was truncated to only one month and issued just prior to the Christmas break. This is contrary to the spirit of meaningful public participation and especially leaves those working in a voluntary capacity struggling to make their voice heard. Despite the impression that the NPWS is not engaged in a genuine attempt to consider the views of others, the IWT wishes to take part in this process in a constructive and positive manner.

*Continuing biodiversity loss*

It is welcome that the draft NBAP acknowledges the serious and on-going pressures faced by our wildlife, despite the obvious benefits that healthy nature brings to society. We also acknowledge that progress has been made in recent years, especially with regard to the knowledge base. The work of the National Biodiversity Data Centre and the generation of red data lists are making an invaluable contribution to our understanding of biodiversity. Elsewhere there has been significant improvements in the planning system in recent years which are delivering better protection for wildlife than had been the case. The reintroduction of white-tailed sea eagles and red kites (although sadly not the golden eagle), targeted programmes for the Natterjack toad and the Lough Boora Parklands have been broadly successful on a number of

levels (to highlight some of the positive initiatives in recent years). The Burren and Aran LIFE programmes are exemplars in good conservation practice.

However the underlying threats to biodiversity have remained unchanged since the first NBAP was produced in 2002. Indeed, some of the pressures, especially from agriculture and forestry, have intensified in the interim. We feel therefore that it is incumbent upon the state, and the authors of this draft plan, to critically analyse why we are failing to meet clearly stated goals and targets. The production of yet another plan, with broadly similar objectives and goals to those that preceded it, and with new, arbitrarily generated target dates is surely a meaningless exercise if we cannot get to the heart of why our beleaguered natural heritage continues to disappear before our eyes. The plan seems to include many worthy actions but with no realistic means of implementing them, especially where they have been present in previous plans and progress is still to be made (e.g. review of the Wildlife Act). We would suggest that given the challenges that exist, a much smaller plan, which is targeted and realistic, would stand a better chance of success than yet another wish list.

#### *Lack of political will*

The IWT suggests that it is a fundamental lack of political will which hampers progress, a feckless disinterest among politicians who routinely see our natural environment as little better than wallpaper or the backdrop to a photo opportunity. The case has yet to be made at a senior level that the declining fortunes of our wildlife coincides with the decline in rural and coastal communities and is leading to the degradation of the Irish landscape and environment, no doubt our most important assets. A case in point is the Hen Harrier, where ample data on the bird's status and ecology, and the availability of substantial funding from the Rural Development Plan to help landowners in protected areas have failed to prevent drastic declines in population – something which can be squarely blamed on a lack of engagement by successive ministers for agriculture and heritage.

As a starting point therefore, the IWT would like to see an action item, under it's own heading, as to how it is proposed to engage national politicians in the urgent need to restore species and habitats before it is too late. This could be done through seminars or one-to-one meetings with politicians. We accept that eNGOs and the general public also have a role to play in meeting this objective and the IWT is more than happy to play its part.

#### *Reform of the NPWS*

This campaign should be accompanied with a review of the budget for the NPWS itself – it is unrealistic to think that the important tasks of this organisation can be fulfilled on the meagre budget it currently works on. The IWT would like to see the recommendations of the Grant Thornton review ('Organisational Review of the National Parks and Wildlife Service, 2010)

implemented, not only with regard to an appropriate budget and staffing levels, but in terms of the organisational structure. A single authority in charge of the NPWS is essential if there is to be leadership and a restoration of morale among staff. We know from our daily experience that the NPWS is full of highly skilled and passionate individuals, however their enthusiasm is smothered by what is perceived as a lack of support and poor communication. This is detailed in the aforementioned Grant Thornton report.

Because the NPWS is now within the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, we believe that its important functions cannot be fully recognised and appreciated. The NBAP should include an objective to reposition the NPWS as an independent agency reporting to the Minister for Environment. This should be similar to the Environmental Protection Agency or even within that organisation.

### *Lack of targets*

The draft NBAP contains many positive actions and initiatives. However specific targets are conspicuously lacking and while ambition is welcome, previous experience shows that realism is needed. For nearly all the actions it will be impossible to evaluate whether the targets have been met or not. The timeframes included similarly seem to have been chosen at random. To give one example, action 4.1.3 (Implement the National Peatland Strategy) does not set a target (in hectares) for the 'area of bog under restoration' or 'the number of bog sites with restoration activities completed'. There is no mention of blanket bogs, a significant portion of the peatland resource, where even recently set targets in the Peatland Strategy have been missed.

Similarly, action 1.1.12 – to identify and take measures to ensure that incentives and subsidies do not contribute to biodiversity loss, and develop positive incentive measures, where necessary, to assist the conservation of biodiversity – contains no indication as to what policies are referred to or how addressing them is to be achieved.

For action 3.1.9 – work with farming organisations and landowners to promote wider understanding of ecologically sustainable land use and the benefit to farmers of biodiversity – the baseline is the Native Woodland Scheme, which seems bizarre. While 'key partners' have been identified, there is no performance indicator and no action to identify what exactly is being proposed.

These are just some examples.

### *Citizen science*

We could kindly ask that the IWT be included among the list of NGOs under action 2.1.9 as we have been, and continue to be, engaged in 'citizen science'

and volunteer based surveys (e.g. for smooth newt, otters, SAC watch and currently for reptiles).

### *Greenwashing*

Industry-based plans, e.g. the marketing initiative 'Origin Green' do not provide an indicator of the health of our wildlife and we feel it is not appropriate to include these in the NBAP, e.g. under action 1.1.11. The appropriate responsibility for actions to enhance farmland biodiversity lies within the Department of Agriculture and not An Bord Bia, its marketing wing. Under action 5.1.1, the Harnessing Our Ocean Wealth plan is given as a baseline for future actions. However this is an economic plan and has little relevance to marine conservation. Indeed these initiatives undermine the protection of biodiversity by 'greenwashing' and giving the false impression that chronic environmental problems do not exist.

### *Proposed Heritage Bill*

Similarly, action 4.5.1, in relation to proposed changes to the Heritage Bill which, if implemented, will see an extension to the hedge-cutting and burning dates, is actively hostile to environmental protection and has no place in the NBAP. Indeed a suggested action might be to ensure that existing hedge cutting and burning dates are maintained. Hedgerows need better protection and maintenance and no actions for this are identified. Similarly, actions to address the annual wave of wildfires which have had such negative effects on upland areas are absent. We would like to see the NBAP recognise the harmful effects of fires in upland areas and promote schemes to help landowners find alternative means of land management in these sensitive areas.

### *National Parks*

Ireland has six national parks and their importance is recognised in the NBAP. However in most of these areas there are chronic conservation issues and a lack of management. As a first step it is essential that an action be included that all national parks prepare a management plan which places biodiversity conservation as the number one priority.

### *Natura 2000*

Although the process of fully designating Natura 2000 sites and setting conservation objectives is important (indeed long overdue), it is essential that renewed impetus is given to the development of management plans for these areas. It is only through the implementation of such plans that we can hope to reverse the declines in biodiversity in these areas.

### *Natural Heritage Areas*

It is noted that the full designation of NHAs, which was an action in previous NBAPs, has been abandoned. These sites have been recognised as of national importance for biodiversity and their lack of legal designation has resulted in deterioration at many sites. Indeed the pNHA network has shrunk since the last NBAP was prepared, a signal surely that some in the Department of Arts etc. considered that once important areas no longer hold conservation value. Despite the legal hurdles, it is essential that the struggle to define a coherent network of nationally important sites not be abandoned. Legal protection alone is not a solution and so it is urgent that these sites be resurveyed and management plans prepared. To accompany this programme the NPWS should publish criteria for NHA status, to allow new sites to be designated.

### *Local Nature Reserves*

We would like to see an action in the NBAP which gives Local Authorities the power to designate local nature reserves under their respective County Development Plans. This would provide an opportunity for local people to engage with conservation and better protect important areas which would not qualify for Natura 2000 or NHA status.

### *Marine – red list, legal protection and MPAs*

The marine environment is under increasing pressure and is suffering biodiversity loss due to overfishing, habitat loss and general lack of management. To begin reversing this an action of the NBAP should be to develop a Red List of marine fish and invertebrates (notwithstanding that one for sharks and rays is forthcoming – something which is most welcome). The lack of legal protection for many marine species, which are known to be endangered, or of restricted distribution has possibly resulted in regional extinctions (e.g. the angel shark). A proposed list of marine species for protection under the Wildlife Act will be shortly published by the IWT and we feel this anomaly needs to be addressed as a matter of urgency.

We very much welcome action 5.2.3 which states that no take zones, or areas where benthic disturbance is to be prohibited, is under consideration. This action should refer to the wider requirement, under the Marine Strategy Framework Directive, to designate a ‘coherent network’ of Marine Protected Areas (MPAs). An MPA differs from an SAC or an SPA in that “its primary and clearly stated objective is nature conservation<sup>1</sup>”. The process of producing ‘natura management plans’ for fishing and aquaculture in SAC/SPAs has been slow. For those which have completed the process, e.g. Roaring Water Bay in Cork, the measures taken are insufficient to protect the wider

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<sup>1</sup> Report from the Commission to the European Parliament and the Council on the progress in establishing marine protected areas (as required by Article 21 of the Marine Strategy Framework Directive 2008/56/EC)

ecosystems. The process of identifying MPAs must commence as a matter of urgency and must include a communication programme which involves local interests and which promotes the potential benefits of MPAs to local economies. Ample funding is available for this under the European Maritime and Fisheries Fund.

Overfishing is perhaps the greatest threat to marine life so we would question why this has not been included in the priorities for research under action 2.1.21.

#### *Access to the environment*

Objective 3 (increase awareness and appreciation of biodiversity and ecosystem services), should identify measures to be taken to protect and enhance access to the environment. While recognising the property rights of landowners, mechanisms need to be put in place so that recreational and scientific access to common, or publically owned areas, e.g. the coastline, river banks, upland commonages, is not unduly restricted.

#### *Deer/Badger census*

The IWT would like to see a scientifically based census of deer and badger populations. These are vital if we are to manage deer and monitor the impact of the state's badger culling programme respectively.

#### *Golden Eagle*

Action 4.5.3 should include the golden eagle as the target for a species action plan as this important reintroduction programme is at risk of failure.

#### *The Gearagh*

Action 4.5.2 should include a stated aim to restore the woodland of the Gearagh in Co. Cork, by working with the ESB to establish appropriate water levels.

#### *Wildlife Crime*

Under Target 4.6 there should be an action to establish a wildlife crime unit within An Garda Síochána.