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Mr Paschal Donoghue
Minister for Finance
Department of Finance
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Upper Merrion Street
Dublin 2, D02 R583

September 20th 2018

Irish Wildlife Trust submission to Budget 2018

Dear Minister Donoghue,

The Irish Wildlife Trust (IWT) is a national, charitable, membership-based organisation which was established in 1979. Our goal is to raise awareness of our natural heritage and its benefits to people. We would like to make a submission for your consideration when preparing the national budget for this year.

Background

Ireland (and indeed the world in general) is in the midst of a two-pronged ecological emergency comprising an extinction crisis and a climate crisis. While the climate crisis is at least acknowledged in the public sphere, the extinction crisis is less well known. Nevertheless, biodiversity is vanishing from across our land and sea at an unprecedented rate. Evidence for this can be found in a series of ‘red list’ reports from the National Parks and Wildlife Service (NPWS) which have found that across all groups of species analysed an average of one third of our native plants and animals are at risk of extinction or ‘near threatened’. A number of species are either already extinct or their disappearance is imminent, such as the curlew, the angel shark and the freshwater pearl mussel. The extinction crisis represents a haemorrhaging of our nation’s heritage as well as undermining some of our most important industrial sectors, most notably fishing, agriculture, tourism and forestry. There is nothing inevitable or predetermined about this decline; it is a result of high-level policy decisions made by successive governments in the absence of any meaningful public debate.

Legal Context

The Irish government has committed to halting the loss of biodiversity by 2020 through its ratification of the Convention on Biological Diversity and as a signatory to

the Aichi Targets. At an EU level we have transposed into our national law the Habitats and Birds Directives, which aim to restore our biodiversity to good health and, for certain specific habitats and species, to ‘establish favourable conservation status’. In this task we are failing miserably. According to an NPWS assessment from 2013, a massive 91% of our most important habitats are in ‘unfavourable’ condition while the proportion for species is scarcely better, with only 52% listed as in a ‘favourable’ condition. A new assessment is due to be published later this year however it is a poorly kept secret that this will reveal no reversal in the chronic decline of our nature in this country.

The Economics of Biodiversity Loss

A report published early in 2018 from University College Dublin and the NPWS highlighted these issues and for the first time analysed national expenditure on biodiversity¹. This landmark study found that direct spending on biodiversity, over the six-year period from 2010-2015, amounted to €1.49 billion, or €250 million per annum. It highlights that while this sounds like a substantial sum, it represents a meagre 0.31% of national spending. This paltry sum is at odds with the assertion from the National Biodiversity Action Plan, published only last year, that “biodiversity supports our livelihoods and enriches our lives²”. However, as already noted, this seemingly substantial expenditure is abjectly failing to make a dent in addressing the extinction crisis. The UCD/NPWS report goes on to note that 96% of the €1.49 billion total went on subsidies (80%), operational costs (10%) and staff (6%), leaving the remainder for actual work on the ground. Environmental non-governmental organisations, like the IWT, “are struggling with budgets that are barely sufficient to cover yearly administrative, personnel and management costs” while even the NPWS (the national body charged with protecting nature in Ireland) “is itself responsible for just 9% of total expenditure and has endured significant budget cuts in recent years”.

The report states:

“continuous year-on-year reduction in budgets have left these agencies [referring to the NPWS and the Heritage Council] in a critical state. Interviews with public servants in both organisations, along with annual reports, reveal that that the capacity of these organisation has been reduced to maintain core infrastructure and critical programmes and priority staff, with many staff in temporary positions or positions left vacant. In some instances, programmes have had to be shut down”... “To meet national targets to halt decline in biodiversity trends and deliver positive gains, core funding for conservation through dedicated government budgetary allocations for conservation needs to be increased”.

It notes how despite the fact that our area of ocean greatly exceeds that of our territorial land, just 1.3% of the budget is linked to conservation of marine biodiversity.

¹ *A National Biodiversity Expenditure Review for Ireland*. 2018. R. Morrisson & C. Bullock. University College Dublin – Planning and Environmental Unit

² *National Biodiversity Action Plan 2017-2021*. 2017. Department of Culture, Heritage and the Gaeltacht.

The report highlights that biodiversity expenditure amounts to only 0.13% of GDP while the International Union for the Conservation of Nature has called on OECD countries to contribute at least 0.3%.

The most recent figures available indicate that the NPWS was in receipt of just over €17 million in 2016. For comparison purposes, and perhaps reflecting the priority given to our natural heritage over other interests, the Greyhound Racing Bord received €16 million of public money in 2017 while Horse Racing Ireland got its hands on a massive €64 million. Indeed the funding to NPWS is dwarfed by the nearly €41 million given to An Bord Bia, the agency which markets Irish food and drink throughout the world as 'green' and 'sustainable'. We simply cannot blame lack of resources for failing to address our extinction crisis.

Meanwhile the Heritage Council suffered a swinging 70% budget cut between 2008 and 2017 and the National Biodiversity Data Centre continues to endure uncertainty over its future. This latter agency is an essential component of biodiversity monitoring and has produced the hugely popular all-Ireland Pollinator Plan).

Current Situation

Clearly there is a mismatch between what we say and what we do. A report from Grant Thornton, published in 2010 to review the operation and resourcing of the NPWS, concluded that the organisation was understaffed (although did not make specific recommendations on funding allocation). Despite some recent recruitments (which are to be welcomed), the IWT is aware of a number of areas where resources are lacking, e.g. there is no ranger for Glenveagh National Park while the marine conservation unit had only two-three people at last count. There is no communication or education unit while resources are totally lacking for the preparation and implementation of management plans for our most important conservation areas (national parks, special areas of conservation etc.) or the establishment of a national network of protected areas (the Natural Heritage Areas which were originally the foundation of our protected area network but which have been all but abandoned).

Our Ask

The IWT is therefore calling on the Department of Finance to look again at a neglected corner of government policy – that of our natural heritage. All politicians claim it is of paramount importance, and yet few champion it. Money flows easily to marketing of its great benefits, yet those on the front line struggle on with threadbare budgets. Our vaulted self-image, as a 'green' and 'unspoiled' island is increasingly at odds with the tide of evidence heralding the extinction crisis on our doorstep.

Fulsome and generous funding would go far further than merely fulfilling our legal obligations. It would restore one of the really great things about Ireland – it's nature! Time is running out for many of the plants and animals which have called Ireland home for millennia and our neglect has already left this generation poorer for it.

The recommendations of the Grant Thornton report of 2010 have been largely unimplemented. Nearly 10 years on, the IWT is calling for a revision to this review, which would make explicit funding recommendations so that the NPWS could be ambitious in spearheading the restoration of nature in Ireland. The IWT suggests that its budget should at least be doubled so that it can be adequately staffed and given the means for actual management measures and new initiatives. We are also calling on the overall biodiversity expenditure to meet the OECD target of 0.3% of GDP. We utterly depend upon nature for a stable climate, clean water, healthy food and liveable surroundings. We may well be the last generation to have the means to reverse the extinction and climate crises – we simply can't afford to screw it up.

Yours sincerely,

A handwritten signature in cursive script that reads "Padraic Fogarty". The signature is written in dark ink and is positioned above the typed name.

Campaign Officer – Irish Wildlife Trust