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Paschal Donohoe
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cc. Micheál Martin, Taoiseach
Eamon Ryan, Green Party Leader

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Irish Wildlife Trust submission to Budget 2020

Dear Minister Donohoe,

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. This was formally recognised by the Dáil in May of 2019. 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 threatened with 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. The drivers of extinction and pollution also tend to be

associated with greenhouse gas emissions, such as peatlands, oceans and woodlands, and so biodiversity protection frequently provides us with ‘nature-based solutions’ to climate targets.

Legal Context

The Irish government had 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. We have not reached these 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 have failed miserably. According to an NPWS assessment from 2019, a massive 85% of our most important habitats are in ‘unfavourable’ condition while the proportion for species is scarcely better, with only 57% listed as in a ‘favourable’ condition.

In July 2020 the European Commission referred Ireland to the European Court of Justice for not fully designating 154 sites under the Habitats Directive and for not implementing management measures at *any* of the 423 Special Areas of Conservation, something an Irish Times editorial described as an “egregious failure by the State”¹.

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 biodiversity². 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 in 2017, that “biodiversity supports our livelihoods and enriches our lives”³.

The Covid-19 pandemic has highlighted the broader links between the health of the natural world and human health, with the UN calling for a decade of ecological restoration which would go some way in addressing this issue.

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.

¹ <https://www.irishtimes.com/opinion/editorial/irish-times-view-on-state-s-failure-to-protect-internationally-important-habitats-1.4299168>

² *A National Biodiversity Expenditure Review for Ireland*. 2018. R. Morrisson & C. Bullock. University College Dublin – Planning and Environmental Unit

³ *National Biodiversity Action Plan 2017-2021*. 2017. Department of Culture, Heritage and the Gaeltacht.

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 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.

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 €13 million in 2019. 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.

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. 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).

The EU's Biodiversity Strategy was published earlier this year which identified ambitious actions to reverse the decline in biodiversity. The Programme for Government, agreed by the three government parties, includes a number of welcome initiatives which – if implemented – would go a long way in addressing this crisis. This includes a review of “remit, status and funding” of the NPWS. These plans must be implemented enthusiastically if we are to stand a chance of a meaningful recovery.

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. 10 years on, the IWT is calling the urgent review of the NPWS and – in the short term – substantially increased funding under existing structures to start the recovery process.

The IWT suggests that its budget should be increased in this budget (to €50 million) so that it can be adequately staffed and given the means for actual management measures and new initiatives. We anticipate that an analysis of actual requirements for a new nature conservation agency will be in excess of this. Other initiatives in the Programme for Government, such as the Land Use Plan and designation of Marine Protected Areas, must be adequately funded so that they can make a meaningful difference. The NPWS review itself must be properly resourced along the Citizens' Assembly on Biodiversity.

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,



Campaign Officer – Irish Wildlife Trust