



Pádraic Fogarty  
Campaign Officer  
Irish Wildlife Trust  
8 Cabra Road,  
Dublin 7,  
D07T1W2

Citizens' Assembly on Biodiversity Loss,  
16 Parnell Square, Dublin 1

September 9<sup>th</sup> 2022

### **Irish Wildlife Trust submission to the Citizens' Assembly on Biodiversity Loss**

Dear members of the Citizens' Assembly,

The Irish Wildlife Trust (IWT) is a national, charitable, membership-based organisation which was established in 1979. Our goal has been to raise awareness of our natural heritage and its benefits to people and for over 40 years we have sought to do this through a combination of education and active campaigning for policies that recognise the inherent value of nature and biodiversity.

In many regards, we have failed in this task as during the decades in which we have been active we have witnessed, not the nurturing care for the natural world which we've been fighting for, but an ever accelerating destruction that has left us impoverished and looking out on ever more degraded sea and landscapes.

Nevertheless, along with our colleagues in the NGO community, and an increasing body of community groups and concerned individuals, we have not given up hope that we can pass a legacy on to the next generation that is vastly better than what we have today. The work of the Citizens' Assembly on biodiversity loss will play a critical role in the formation of that legacy.

The collapse of biodiversity, which is not confined to Ireland but is a global crisis, is acknowledged as among the primary threats to humanity's future, at least on a par with climate change. Indeed, the link between biodiversity loss and climate change is such that they can be seen as one issue: one driving the other, both rooted in our patterns of consumption, but each supporting the other so that restoring biodiversity is also climate action, while driving down emissions of greenhouse gases will ensure that essential ecosystems can thrive.

It can be hard to understand how the loss of species can be a threat to humanity. Experience in Ireland has shown that when pitted against the prospect of economic development and

employment, nature rarely comes out on top. It has been seen as something that's 'nice to have' but never 'critically important' like roads, schools or hospitals. It can be hard to believe that we have destroyed practically all vestiges of natural ecosystems in Ireland while living in a wealthy country with a level of consumer choice that would have been inconceivable even one generation ago. Yet, we depend fundamentally upon nature for our wellbeing and survival, and, having laid waste to our own ecosystems we are unwittingly doing the same at a global level through our unsustainable consumption patterns which draw on resources from across the world.

Yet, the destruction of biodiversity in Ireland has been a choice and addressing this crisis is also a question of choices. We can choose not to have a biodiversity crisis. We can choose to make decisions now that bring nature back, not in a way that pits it against economic development, but in a way that sees us all as a part of nature. We can recognise that nature is not just 'nice to have' but essential for our future happiness and prosperity. In restoring nature we protect not just birds and fish, which are wondrous in their own right, but ourselves, and the generations to come after us.

We have no doubt that the collective wisdom of the Citizens' Assembly will carefully consider the choices we have ahead of us. We urge you all to be bold and ambitious, and not afraid to propose radical ideas. As a group that has worked in this field for 42 years, we respectfully make the following submissions for your consideration. In our view the challenge boils down to two main issues: 1) getting the State to live up to its commitments and lead in addressing the biodiversity crisis, and 2) reconnecting the Irish people with the wonders, and the value, of nature.

#### 1) The State as leader

Much of the work of the IWT over the decades has centred on holding the Government, and the various organs of the State, to account, either in passing laws and policies with greater ambition, or in implementing laws and policies it has already approved. If Ireland were fully in compliance with all of the directives from Europe and all of the commitments in our National Biodiversity Action Plans (of which there have been three so far and a fourth in preparation) we would already have clean waterways, bountiful populations of fish at sea with 10% of our ocean in Marine Protected Areas and all of our most important habitats and species in a healthy state. Fishing, agriculture, forestry and peatland activities would not be the threat to biodiversity that they are today. However, to-date, this has not happened and breaking environmental laws has been the norm. In fact, it has been a pain-free path for the State. One of the great challenges for the Citizens' Assembly will be crafting recommendations to ensure that contravening laws and policies to protect nature is not seen as an easy path.

In this regard we can look to the formation of the Climate Act<sup>1</sup> and the independent Climate Change Advisory Council. While Ireland first committed to developing a Biodiversity Action Plan (BAP) in 1992, none of the three plans which have been published to-date has been effective. The latest draft BAP calls for an 'all-of-government' approach and this is essential but is only possible if the structures are in place to ensure that 'all-of-government' is responsible and can be held accountable for its delivery. We would like to see a **new Biodiversity Act** that puts the BAP on a statutory footing, with clear lines of responsibility and accountability, funding and political support from the highest levels. While there has been an independent Biodiversity Forum (on which the IWT sits, representing the Environmental Pillar) this has been underfunded, with no secretariat and, in our view, poor lines of communication with relevant ministers and the public more widely. Passing a Biodiversity Act and strengthening the Biodiversity Forum would represent a radical transformation in how the biodiversity crisis is addressed and communicated.

In December this year, the government will be represented at COP15 in Montreal<sup>2</sup> where, it is hoped, the international community will agree on a framework for protecting and restoring biodiversity at a global level. It is hoped that a headline commitment will be the protection of 30% of land and sea area by 2030, known as 30x30 in shorthand. Ireland will negotiate as part of the EU team at this meeting and the EU has already committed to 30x30 in its Biodiversity Strategy. However, while some countries like France and Germany, have signed up to this goal, Ireland has only signed up to protect 30% of the sea. This is not leadership. Ireland could, and should, **commit to protecting 30% of land by 2030**, in a just and ecologically coherent way. If done correctly it could be a defining project for the country that activates local communities and landowners in a hugely positive way.

Key state agencies, whose activities have a significant impact on biodiversity include Coillte, Bord na Móna and the Office of Public Works. **The remit of these bodies must be reformed** in order to tackle the climate and biodiversity crisis. We also need to see policies and plans from across the Government, most notably our food strategy<sup>3</sup>, to acknowledge the finite boundaries of pollution and biodiversity loss, something which is not currently the case.

## 2) Reconnecting people to nature

It is sadly the case that as a people we have largely lost our sense of connection to the natural world that surrounds us. Few people know the names of common trees, flowers or birds. We walk past polluted rivers, overfished oceans and near-lifeless landscapes with scarcely an acknowledgement of what has happened to our country. This has allowed the destruction of nature to be seen as a 'victimless crime' while the state of our natural environment is hardly

---

<sup>1</sup> Climate Action and Low Carbon Development (Amendment) Act 2021

<sup>2</sup> This is the Conference of the Parties (COP) to the Convention on Biological Diversity, an international agreement for the conservation of biodiversity dating to the Rio Earth Summit in 1992

<sup>3</sup> The most recent FoodSmart 2030 Plan does not aim to meet minimum legal compliance with environmental laws

ever a political issue. However, we have also seen that Irish people love nature, and are not happy with the level of degradation once this has become apparent to them. How can the Citizens' Assembly craft recommendations that seek to nurture better understanding, more education and a greater sense of belonging to nature?

One way may be to grant '**Rights of Nature**' in our **Constitution** like some countries have done. If a corporation can sue for damages why can't a river or a threatened species? What of the >100 species that have been driven to extinction from Ireland by human activity, do they have a right to return? Do endangered species and vital ecosystems have a legal right to exist, and indeed flourish, in Ireland? Currently, our Constitution has no reference to nature or biodiversity but such a move would represent a dramatic ethical shift in our relationship with the non-human world. Such moves must be accompanied by an **education campaign**, along the lines of what we saw during the Covid-19 crisis. We need to develop an 'ecological literacy' so that people know why we have a biodiversity crisis and are aware of what we need to do about it. Only with wide popular support will we see the bold actions needed from our political leaders which is so essential in implementing law and policies as we discussed above.

We wish you well in your deliberations and we appreciate that the task ahead can lead to a sense of being overwhelmed. However, we hope you will also see the enormous opportunity that lies ahead in shaping and Ireland that is once again brimming with nature.