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Irish Wildlife Trust submission to the Uniform Format of the National Restoration Plans

To whom it may concern,

The Irish Wildlife Trust (IWT) is a non-governmental organisation with charitable status that was established in 1979 to speak out for wildlife and its benefit for people. We welcome the opportunity to submit to this consultation on the National Restoration Plan Framework.

Public participation is mentioned twice in the plan with it being optional for Member States (MS) to add in details about regional diversity including social, economic and cultural requirements. As public participation is a key component in ensuring the success of the Nature Restoration Regulation (NRR) we believe that there should be a more in depth section asking specific questions to MS on how exactly they plan to achieve an open, transparent, and inclusive process throughout the entire implementation which is referenced in Article 14(20) of the law. This is not mandatory under the Birds and Habitats directives and so, in order to improve on this, greater detail should be included here. Ensuring full legal compliance with all aspects of the law throughout the template is vital for the success of restoration measures and to ensure there are no loopholes or excessive flexibility which can be exploited. On financing, a dedicated ongoing Nature Restoration Fund is needed to ensure MS success in restoration measures. The template could also include a section to acknowledge the socio economic benefits from successful restoration measures as well as the benefits arising from ecosystem services Showcasing the financial savings by engaging in effective nature restoration will be valuable for future reporting.

It is also important to ensure that MS restoration actions are backed by science and that the most ecologically important areas are chosen for measures. Having a mandatory section in the form requiring specific research to be referenced would be a way to ensure that the actions have been carefully considered with the specific sites in mind and that a broad 'one action fits all' solution is not used. Ecological coherence across restoration sites should be an integral part of the national plans. Long term vision to ensure the 2050 targets are met must be included in early restoration measures.

There are not enough linkages between the different articles and the restoration activities. For example, in order to assist with the restoration of estuaries and other coastal habitats,

actions need to be taken in regards to forestry and agriculture. Having mandatory sections requiring MS to link these together will help form a cross ecosystem approach and encourage cooperation between different government agencies/departments who may be solely responsible for one particular ecosystem.