



**Irish Wildlife Trust Submission to  
Public Consultation on Ireland's draft  
National Nature Restoration Plan**

**1st July 2026**

The Irish Wildlife Trust (IWT) welcomes the opportunity to respond to the first public consultation on Ireland's draft National Nature Restoration Plan (NRP).

The NRP represents a historic opportunity — arguably the most significant piece of biodiversity legislation to bind Ireland in a generation. The IWT broadly supports the ambition of the EU Nature Restoration Regulation (NRR) and acknowledges the effort that has gone into producing this early draft. However, we are concerned that the draft, as it stands, risks falling short of what is legally required and ecologically necessary. Our response reflects the urgency of the biodiversity crisis, the scale of the restoration challenge, and the need for the State to lead by example — particularly on public lands. This submission is structured around the consultation questions set out in the public consultation form. Section references to the draft NRP template are provided, in italics, throughout to anchor each recommendation to the document under review. Additional cross-cutting positions are set out in Question 20.

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## Section 3 – Draft NRP Content

### **Question 4: How adequate are the proposed measures at this stage?**

The IWT considers the proposed measures to be limited in their adequacy at this stage.

While the draft NRP demonstrates a commendable breadth of programmes the measures as presented are largely a catalogue of existing schemes rather than a targeted, scaled restoration programme capable of meeting the binding legal obligations of the NRR by 2030, 2040, and 2050. Several critical deficiencies stand out:

1. The measures lack quantified targets at habitat type level. The draft uses Habitat Group-level aggregation throughout, which, while permissible as a practical flexibility to 2030, cannot be allowed to mask the obligation to restore each individual Annex I habitat type to Favourable Conservation Status (FCS) by 2050.
2. The financial estimates confirm the scale of ambition is insufficient. Annual running costs for grassland ecosystems alone are estimated at over €540 million, yet no credible funding pathway is identified beyond existing CAP and LIFE programme commitments, many of which expire before 2030.
3. Recognising the essential role farmers play in delivering nature restoration, financial support for farmers to restore and protect nature should be increased as a priority. While voluntary agri-environment schemes such as ACRES and Eco-Scheme are an important part in the approach, they are historically underfunded with low participation rates. Increased payments for voluntary agri-environment schemes

should be complemented by statutory measures where necessary to ensure the delivery of legally binding nature restoration targets. CAP Payments should be more closely linked to nature restoration outcomes.

4. Public bodies — particularly Coillte and Bord na Móna — are listed as delivering restoration measures without any legally binding obligation or reformed mandate to do so. This is a fundamental gap.
5. The urban ecosystem section (Article 8) remains almost entirely undeveloped, with a national approach yet to be agreed.
6. Measures for the marine environment are extremely underdeveloped. There is no mention of passive restoration areas (which have been shown to be the most effective way of beginning restoration in marine ecosystems<sup>1</sup>), or development on how activities at sea, including fisheries and aquaculture, will undergo environment assessments to ensure they align with restoration targets.
7. Plans for the proper development of Joint Recommendations to protect offshore ecosystems through the EU Common Fisheries Policy was not included in the plan. These JRs are needed to manage fishing vessels from other Member States and without them Ireland will not meet its protection or restoration targets.
8. Habitats do not exist in isolation and neither do the pressures impacting them. Pressures from terrestrial ecosystems such as agricultural runoff will impact marine ecosystems and this has not been addressed sufficiently in the plan. Article 4 and % habitats are intrinsically linked and the plan and proposed measures must acknowledge this and detail the cross departmental work which is needed. Clarity is needed on how conflicting interests among these departments are resolved and overarching decisions are made.
9. Restoration measures should be aligned with the objectives of the Birds and Habitats Directives, Water Framework Directive (WFD), Marine Strategy Framework Directive (MSFD) and Common Fisheries Policy. Integrating restoration measures into workplans for the MSFD and WFD is essential.
10. While Natura sites must be prioritised up until 2030, many habitats occur outside these areas. Plans for these areas should be included as it is easier and more cost effective to restore a degraded habitat now, rather than reestablish habitats where they have been lost. Habitats which are considered to be in good environmental status, should have measures in place to ensure that they do not deteriorate.
11. Damaging activities, such as bottom trawling, must be restricted in order to restore marine ecosystems.
12. Roles and responsibilities for governing bodies for the protection of marine ecosystems must be clarified as this is currently unclear.

*NRP Reference: Sections 4.3, 6.1, 8.1, 11.1 and Part C.*

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<sup>1</sup> <https://www.nature.com/articles/s41467-025-57254-2>

## Question 5: What is missing from the proposed measures?

### 5.1 A Strategy for Public Lands

The single most important missing element for terrestrial ecosystems is a comprehensive, time-bound strategy for nature restoration on public lands. Public bodies — Coillte, Bord na Móna, NPWS, OPW, ESB, local authorities, and the Defence Forces — collectively manage approximately 8–11% of Ireland's land area. These lands offer the greatest opportunity for large-scale habitat restoration without the complexity of private land negotiation. The government has repeatedly stated that public lands will be a priority component of the NRP. Yet the draft contains no binding targets, no reformed mandates, and no cross-departmental delivery mechanism for public bodies. This must be remedied urgently.

*NRP Reference: Sections 4.3, 6.2.3, Part C Measures 4–6 and 11.*

- Announce a cross-departmental Public Lands for Nature strategy with a full stocktake of public lands suitable for restoration, measurable restoration targets aligned with NRR obligations, and reformed legal mandates for Coillte and Bord na Móna.
- Issue new Letters of Expectation to Coillte and Bord na Móna immediately, with specific, enforceable obligations linked to NRP delivery.
- Redirect a proportion of annual dividends from Coillte and Bord na Móna into a dedicated nature restoration fund for public lands.
- Require Coillte to transition from commercial to restoration and conservation management in all publicly owned Natura 2000 sites and NHAs, including the 53% afforested cover within the six Hen Harrier SPAs.
- Consider new national parks, including in the Midlands on Bord na Móna's Moundillon and Blackwater Bog complexes.

### 5.2 Robust, Legally Defensible Calculation of Favourable Reference Areas

The Favourable Reference Areas (FRAs) underpinning the NRP's re-establishment targets are systematically underestimated. An EU report by the expert group on reporting under the Nature Directives states<sup>2</sup> that, '*Favourable reference range is the range within which all significant ecological variations of the habitat are included for a given biogeographical region and which is sufficiently large to allow the long-term viability of the habitat*'. The draft itself acknowledges that approaches for calculating habitat re-establishment requirements remain under development for some habitat groups. The FRA values proposed for the grassland habitat group appear extremely low relative to the historic extent of semi-natural grasslands in Ireland and require transparent justification. The draft NRP reports a favourable reference area of 54.4 km<sup>2</sup> for the grassland and pastoral habitat group, yet provides limited explanation of the methodology used to derive these values. Article 14(2) of the NRR explicitly requires historical distribution records and climate projections to be incorporated into FRA calculation. This has not been done.

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<sup>2</sup>

<https://circabc.europa.eu/sd/a/94a148a0-dc47-47e1-b853-0e78ad18a115/Guidance%20on%20FRVs-Art-17.pdf>

For the marine environment FRA was set the same as the estimated coverage of each habitat group. This coverage was already significantly underrepresenting the true coverage of the habitats. For example, the national plan states that seagrass beds have an estimated coverage of 23.5 km<sup>2</sup> while recent scientific publications state that there is **at least** 54.85 km<sup>2</sup> (Beca-Carretero *et al.* 2024).<sup>3</sup> Setting FRA the same as the current estimated range of habitats is not appropriate or scientifically robust. Setting FRA at the same level as the incorrect estimated range for the habitats, absolves the Government from committing to reestablishment targets for 2030.

The marine environment is struggling, with 12 out of 14 habitats deemed to not be in good environmental condition and 7 of these in bad condition. The marine section should be as ambitious as possible in this early stage and show the appropriate ambition in order to turn the tide for marine ecosystems. The explanation in 7.2.3.3 on how FRA was calculated does not consider ecological potential (potential extent of range, taking into account physical and ecological conditions), natural range, historical distribution and abundances and causes of change, including trend, connectivity, fragmentation, dynamics of the habitat and the requirements of the species that rely on the habitat. In the Article 17 report from 2013 the NPWS stated, '*Favourable Reference Values are set as targets against which current values are judged. These reference values should be at least equal to the value when the Directive came into force unless this value is not deemed to be enough to ensure the long term survival of the habitat or species being assessed.*' There are data available on many marine ecosystems showing historical ranges and where they have been lost. Not using these data goes against the legal requirements of the law. An example of this is the extent of historical oyster reefs in Irish waters.

*NRP Reference: Sections 6.2.4, 6.2.6, 6.3.1, 7.1.4.1, 7.2.3.3 and 7.2.3.*

- Reassess all FRA values using comprehensive historical datasets, the European Commission's guidance, and Article 14(2) requirements.
- Apply the precautionary principle for fragmented and declining habitats, including grasslands, native woodlands, peatlands and the habitats listed under Article 5.
- Fully document all methodological changes since the 2019 Article 17 report, with clear ecological justification for any reductions in FRA.
- Citizen science data on the marine environment is crucial. Citizen science data is used in other sections of the plan, and since there is a lack of information on the marine environment, it is not credible that all available data sources would not be used. Historical data from Seasearch and the NBDC (as well as other citizen science projects) should all be collected.
- Ranges prior to 1994 when the Habitats Directive was initiated must be taken into account.
- Habitats will undergo further pressure into the future due to climate change and these projections should be taken into account. It is imperative that we increase habitat coverage enough so they have more resilience to a changing climate.

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<sup>3</sup> <https://www.sciencedirect.com/science/article/pii/S0025326X24010592>

- Follow recommendations in reports from EU expert groups on the setting of FRA.

### 5.3 A Binding Invasive Alien Species Strategy and Bureau

Invasive alien species (IAS) are among the most significant pressures on Ireland's biodiversity and now rank among the leading causes of unfavourable conservation status across protected habitats and species.<sup>4</sup> The 2025 Article 17 report identifies IAS as a major driver of deterioration in a wide range of Annex I habitats, including saltmarshes, coastal dunes, native woodlands, fens and freshwater ecosystems. Restoration efforts under the Nature Restoration Regulation will not achieve their intended outcomes unless invasive species management is treated as a core restoration requirement rather than a supplementary measure.

The IWT supports the establishment of a National Invasive Species Bureau and recommends that it be designated as the operational lead within the NPWS governance framework for invasive species management. The Bureau should be responsible for developing, implementing and reporting on a binding National Invasive Species Strategy, with measurable targets for prevention, eradication, containment and long-term control linked directly to restoration outcomes under the NRR.

The IWT recommends that the NRP:

- Designate the proposed Invasive Species Bureau as the lead delivery body for invasive species management and national coordination.
- Require the development of a binding National Invasive Species Strategy with measurable eradication, containment and prevention targets, supported by regular public reporting and accountability mechanisms.
- Recognise that effective invasive species management often requires action beyond individual sites and establish Bureau-led landscape-scale programmes across catchments, peatland complexes, woodland networks, protected areas and neighbouring landholdings.
- Integrate invasive species control as a priority restoration measure under the NRP, including targeted action against *Rhododendron ponticum* in native oak woodlands, Himalayan balsam (*Impatiens glandulifera*) in riparian and fen habitats, Common cord-grass (*Spartina anglica*) in saltmarshes, and Sea-buckthorn (*Hippophae rhamnoides*) in dune systems.
- Develop site-specific management plans for priority invasive species identified in the Article 17 reporting process, supported by long-term monitoring and follow-up management.
- Strengthen risk assessment and listing processes. High-risk invasive species should be rapidly assessed for inclusion on the list of Species of National Concern, with interim restrictions introduced where feasible to limit their sale and release while

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<https://www.gov.ie/en/department-of-housing-local-government-and-heritage/press-releases/minister-sullivan-publishes-new-report-on-the-status-of-irelands-eu-protected-habitats-and-species/>

assessments are completed. The current assessment and designation process is often too slow relative to the rate at which invasive species can establish and spread, resulting in avoidable ecological damage and significantly higher long-term management costs. The NRP should support a precautionary approach whereby credible evidence of ecological risk can trigger temporary restrictions, surveillance, and early intervention measures pending formal assessment outcomes. Prevention and early action should be prioritised over post-establishment control wherever possible.

- Establish a dedicated national Early Detection and Rapid Response system, including national surveillance, clear reporting and escalation procedures, pre-agreed response protocols, and ring-fenced emergency funding.
- Apply the precautionary principle to emerging invasive species. Where a species has demonstrated invasive behaviour in neighbouring jurisdictions or comparable ecological regions, the Bureau should be empowered to recommend temporary management measures, pathway restrictions, monitoring requirements, or targeted eradication actions while formal assessments are underway.
- Review the trade and sale of high-risk invasive plants and introduce restrictions where supported by risk assessments and evidence.
- Require public bodies, including Coillte, Bord na Móna and other State landowners, to prepare and implement invasive species management plans and biosecurity protocols across their estates.
- Support landowners and farmers through grant schemes, technical advice and restoration funding, including making invasive species control a condition of land eligibility where appropriate and providing financial support for eradication measures.
- Recognise and support community-led invasive species action through dedicated funding, training, and the creation of a central open-access repository of species-specific guidance and best practice. The National Invasive Species Strategy should provide a framework for coordinating volunteers, local communities and civil society organisations within an all-island approach.

*NRP Reference: Sections 5.1–5.5, 6.4, 7.4 and relevant Part C measures.*

#### **5.4 A Strategy to Phase Out Non-Native Monoculture Plantation Forestry and Rapidly Expand Native Woodland Cover**

Ireland's forest estate is dominated by non-native conifer plantations — approximately 70% of total forest cover, with Sitka spruce alone accounting for roughly 45% of the national estate.<sup>5</sup> This plantation model, built on repeated cycles of clear-felling and replanting, is fundamentally incompatible with the objectives of the NRR and represents one of the most significant structural barriers to meeting Ireland's obligations under Articles 4, 12, and 13. The draft NRP does not adequately address this incompatibility. The NRP must explicitly

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[https://www.treecouncil.ie/forestry-statistics-ireland?srsId=AfmBOoox4F4RFF1Mq\\_hl\\_5ErryDMc3A0M3Db3lBoYkbwFh4vqdYFAEcA](https://www.treecouncil.ie/forestry-statistics-ireland?srsId=AfmBOoox4F4RFF1Mq_hl_5ErryDMc3A0M3Db3lBoYkbwFh4vqdYFAEcA)

acknowledge that non-native monoculture plantation forestry is currently a net pressure on biodiversity, not a restoration measure.

*NRP Sections 4.2.8, 4.2.9, 6.2.3, 12.1.1, 12.2 and Part C Measures 61–65.*

The 2025 Article 17 report confirms that forestry remains among the leading pressures on Ireland's protected habitats and species, including:

- Afforestation of peatlands: an estimated 450,940 hectares of peatland has been inappropriately afforested, including by State bodies.
- Severe damage to freshwater ecosystems through acidification, sedimentation, and nutrient leaching — forestry is now recognised as a key pressure on Ireland's Blue Dot catchments.
- Destruction of open upland habitats: the six Hen Harrier SPAs now have 53% forest cover, contributing to a 54% decline in Hen Harrier populations within those SPAs since 2007.
- Spread of non-native conifers, particularly Sitka spruce, as self-seeding species outcompeting native vegetation in the wider landscape.

### **Required measures: Forestry Programme alignment**

The current Forestry Programme (2023–2027) predates the NRR and has not been revised to reflect its obligations. The NRP must drive urgent alignment:

- The mid-term review of the Forestry Programme must integrate NRP requirements, with quantified targets cross-referenced to NRR articles.
- Post-2027 Forestry Programmes must be designed from the outset to be fully compliant with the NRR.
- Remove altitude and productivity restrictions from native woodland schemes that currently prevent ecologically appropriate planting on upland and marginal land.
- Update procedures to allow easier conversion of commercial plantations to native woodland, prioritising natural regeneration over stem-count requirements.
- Phase out public subsidies for large-scale Sitka spruce monocultures. Public money must not continue to fund forestry models that drive biodiversity loss, degrade water quality, and undermine ecosystem resilience.
- Set ambitious, time-bound targets for native broadleaf planting, Continuous Cover Forestry (CCF), and Close-to-Nature Silviculture within each successive Forestry Programme.

### **Required measures — Native woodland restoration at scale**

Native woodlands cover less than 2% of Ireland's land area — among the lowest in Europe — and are critically fragmented. The NRP must set out a clear national strategy for rapidly expanding native woodland cover:

- Identify clusters of high conservation value native woodlands using Ancient and Long-Established Woodland (ALEW) records, Annex I habitat data, and public estate mapping, and expand restoration outward from these core areas.
- Prioritise natural regeneration wherever possible, with locally provenanced native planting stock used only where natural regeneration is insufficient.
- Work with the tree nursery sector to ensure that demand under future Forestry and CAP programmes is supplied by Irish nurseries providing locally provenanced stock, protecting genetic diversity and supporting local economies.
- Establish native woodland buffers of at least 200 metres around all identified ALEW sites, prohibiting non-local provenance material within these zones.

### **Required measures — Strict protection of ALEW**

All existing Ancient and Long-Established Woodlands (ALEW) must be strictly protected immediately as the irreplaceable seed bank and ecological reference point for all future woodland restoration. The ultimate goal must be the creation of old growth forests of the future — structurally complex, multi-layered ecosystems that require 150–500 years without major disturbance.

- The NRP should set out a strategy to bring all ALEW into strict protection, prioritising SAC-designated woodlands as a first step.
- Strict protection must include the removal of commercial forestry operations, active deer and invasive species management, and exclusion of non-native planting within and adjacent to ALEW sites.

### **Required measures — Reform of Coillte's mandate**

Coillte manages approximately 440,000 hectares — 73% non-native conifer plantation — and cannot continue to be listed as a delivery partner in the NRP while operating under a mandate that prioritises commercial timber extraction and while continuing to clearfell within Natura 2000 sites and afforested peatlands.

- Reform Coillte's legal mandate in the Forestry Act 1988 to require ecosystem based land management as a primary objective alongside sustainable timber production.
- Issue binding Letters of Expectation requiring transition away from large-scale clearfelling, widespread adoption of CCF and Close-to-Nature Silviculture, large-scale native woodland restoration, and restoration of afforested peatlands — starting with legacy plantations on deep peat.
- Phase out clearfelling within all Natura 2000 sites and NHAs on the Coillte estate, replacing it with native woodland restoration.
- Require Coillte to publish and implement a time-bound restoration plan for the approximately 137,000 hectares of deep peat within its estate that has been afforested.

## **Required measures — Upland conflict between woodland and open habitat restoration**

The NRP must for the first time establish a high-level strategic approach to how woodland expansion and the restoration of semi-natural open habitats — blanket bog, wet heath, dry heath, and upland grasslands — can advance simultaneously without one undermining the other.

- Proactively map upland areas suitable for native woodland restoration without conflict with Annex I open habitat obligations, prioritising non-designated areas, extensive bracken and gorse stands, and degraded ground.
- Prioritise the restoration of semi-natural open habitats in key areas such as Hen Harrier SPAs before advancing woodland cover in those landscapes.

*NRP Reference: Section 12.1.2, Section 12.2, Part C measures 62–65*

- Set mandatory minimum targets for deadwood retention in all forest management plans on public land.
- Protect all veteran native trees from commercial exploitation, allowing them to complete their full natural lifecycle.
- Introduce a Forest Bird Index based on the BirdWatch Ireland feasibility study (August 2025), supplemented by targeted forest bird surveys to ensure that forest specialists — not generalist species — are adequately represented.

## **Required measures — Article 13 tree planting NRP Reference:**

*NRP Reference: Section 13.1*

- Only native tree species planted since the NRR came into effect should be counted towards Ireland's Article 13 contribution.
- Planting must follow ecological principles: native species, diverse age and structural composition, and enhancement of ecological connectivity.
- Planting for connectivity must be prioritised over the ad hoc afforestation of isolated plantation blocks.

## **5.5 A Forest Bird Index**

The CBS and I-WeBS surveys currently used do not produce a common forest bird index. Without targeted forest bird surveys, generalist species will mask the decline of forest specialists. The NRP must commit to introducing a Forest Bird Index by 2027 based on the BirdWatch Ireland feasibility study, as a binding Article 12 monitoring commitment.

*NRP Reference: Section 12.1.2.4*

## 5.6 Wildlife Crime Monitoring, Enforcement and Wildlife Rehabilitation Infrastructure

Effective nature restoration requires not only habitat restoration and species recovery actions, but also robust systems for monitoring wildlife health and tackling wildlife crime. Wildlife persecution, illegal habitat destruction, wildlife trafficking, and emerging wildlife disease threats can undermine restoration outcomes and must therefore be integrated into the National Restoration Plan's monitoring and reporting framework.

The NRP should recognise wildlife crime as a significant pressure on biodiversity and commit to strengthening monitoring, enforcement, and transparency mechanisms. This should include the establishment of a comprehensive national wildlife crime reporting framework and the incorporation of wildlife crime indicators within NRP monitoring and evaluation systems.

The Irish Wildlife Trust recommends that the NRP:

- Support the establishment of a National Wildlife Crime Unit, led by An Garda Síochána and supported by NPWS expertise, with dedicated investigative, intelligence, and forensic capacity.
- Strengthen wildlife crime enforcement through specialist NPWS enforcement teams, dedicated wildlife crime liaison officers within An Garda Síochána, and increased inter-agency cooperation.
- Increase NPWS conservation ranger capacity nationwide to ensure effective monitoring, enforcement, evidence gathering, and compliance with nature protection legislation.
- Develop a national wildlife crime intelligence and reporting system that collates existing datasets from NPWS, An Garda Síochána, Inland Fisheries Ireland (IFI), and the Department of Agriculture, Food and the Marine (DAFM), including information on investigations, prosecutions, convictions, seizures, repeat offenders, and geographic hotspots.
- Commit to mandatory annual wildlife crime reporting to the Oireachtas, providing transparent national data on wildlife crime trends and enforcement outcomes.
- Include indicators relating to wildlife persecution, illegal habitat destruction, wildlife trafficking, and species-specific incidents within NRP monitoring and reporting frameworks.
- Strengthen measures to address cyber-enabled wildlife crime, including online wildlife trafficking, digital evidence gathering, and cooperation with online platforms.
- Integrate coordinated wildlife health surveillance and wildlife rehabilitation data into national biodiversity monitoring systems to improve understanding of emerging threats, mortality trends, and restoration outcomes.

*NRP Reference: Sections 5.1–5.5 and 2.1.*

## 5.7 Rewilding, Natural Processes and Strict Protection

The Nature Restoration Plan presents an important opportunity to scale up nature recovery by restoring natural processes alongside more traditional habitat management approaches. Rewilding can provide a practical and cost-effective mechanism for restoring degraded ecosystems while enhancing biodiversity, climate resilience, carbon storage, flood regulation and rural development.

Rewilding is fundamentally about restoring ecological processes and allowing ecosystems to recover and sustain themselves with reduced long-term intervention. For many habitats, including native woodlands, river floodplains, peatlands and marine ecosystems, natural regeneration and process-led recovery may provide the most effective pathway towards favourable conservation status.

The IWT notes that existing restoration approaches alone are unlikely to achieve the scale of habitat recovery required under the NRR. In many cases, addressing the underlying pressures that prevent ecosystem recovery and allowing natural regeneration to occur represents the most ecologically coherent and cost-effective approach. Examples such as the long-term woodland restoration programme in Glenveagh National Park demonstrate the potential for large-scale habitat recovery through process-led management.

The IWT recommends that the NRP:

- Recognise rewilding as a legitimate and practical restoration tool where natural regeneration and low-intervention management are appropriate.
- Promote the restoration of natural ecological processes across degraded peatlands, river floodplains, native woodlands, coastal habitats and marine ecosystems.
- Use publicly owned land to demonstrate best-practice examples of process-led restoration and natural regeneration at landscape scale.
- Support the development of rewilding projects that deliver benefits for local communities, including employment, nature-based tourism, flood mitigation, carbon storage and other ecosystem services.
- Explicitly address Ireland's commitment under the EU Biodiversity Strategy for 2030 to protect at least 30% of land and sea and to place at least one-third of protected areas under strict protection.
- Set out a clear pathway for achieving strict protection targets through the NRP and any associated Nature Restoration Strategy.
- Ensure that a proportion of strictly protected areas are managed to wilderness standards, allowing natural ecological processes to operate with minimal human intervention and providing reference sites for long-term ecosystem recovery.

*NRP Reference: Sections 4.3, 6.2.3, 6.3.2, 11.1 and relevant Part C measures.*

## 5.8 Deer Management

Overgrazing by deer is one of the most significant and most systematically underaddressed pressures on Ireland's protected habitats and species. It is a primary driver of the failure of native woodland natural regeneration, the degradation of blanket bog and upland heath, and the suppression of ground flora recovery across both designated and undesignated sites. The draft NRP lists the Irish Deer Management Strategy (published 2023) as a measure under Part C but provides no binding targets, no population density objectives, no monitoring framework, and no enforcement mechanism. Listing a strategy as a measure without resourcing or obligating its implementation does not constitute credible restoration planning.

The IWT notes the recent classification of Sika deer (*Cervus nippon*) as an Invasive Alien Species of Union Concern under Regulation (EU) No 1143/2014. This reclassification has significant implications for how Sika must be managed under national law and should be explicitly reflected in the NRP. Non-native invasive deer species must be prioritised for control ahead of native species such as Red Deer (*Cervus elaphus*), while acknowledging the need to manage even native and naturalised herbivores at ecologically appropriate densities.

The IWT calls for the following to be incorporated into the NRP:

- Set legally binding deer density targets linked to measurable ecological outcomes and minimum thresholds for new stem regeneration per hectare as a monitoring indicator.
- Require NPWS and Coillte to publish and implement site-specific deer management strategies for all national parks, nature reserves, and Bioclass sites within their estates, including population data, density targets, culling plans, and annual reporting.
- Fully implement the Irish Deer Management Strategy (2023) with dedicated funding, full-time deer management personnel, and a transparent national deer population monitoring programme.
- Prioritise control of Sika deer in line with its IAS of Union Concern status, with eradication objectives set for isolated populations where feasible.
- Make deer fencing more financially accessible for private landowners under the Forestry Programme, with long-term maintenance funding to ensure durability of investment.
- Recognise deer management as a core restoration enabling action across Articles 4, 11, and 12, and embed it explicitly within the monitoring and effectiveness assessment frameworks under Section 5.

*NRP Reference: Part C Measure 12, Sections 6.2.5 and 12.1.1.*

## 5.9 Reducing Sheep Grazing Pressure on Semi-Natural Habitats

Overgrazing by sheep is a primary and persistent pressure on Ireland's most important and most threatened semi-natural habitats, including blanket bog, wet heath, dry heath, upland grasslands, machair, and coastal habitats. The 2025 Article 17 report confirms that intensive grazing and overgrazing affect 41% of Ireland's Annex I habitats, making it the single most widespread agricultural pressure on protected ecosystems. This is the direct consequence of decades of headage-based subsidy systems that incentivised maximum livestock numbers regardless of ecological carrying capacity, a legacy that continues to distort land management decisions despite the shift to area-based payments.

Yet the draft NRP contains no specific targets or measures for reducing sheep numbers or grazing pressure on semi-natural habitats. ACRES, the Eco-Scheme, and GAEC are listed as contributing measures, but none of these instruments set enforceable stocking density limits on sensitive habitats, and participation remains voluntary. The IWT considers this a critical gap, particularly given that overgrazing is simultaneously suppressing the natural regeneration of native woodland, degrading blanket bog hydrology, and preventing the recovery of upland heath and grassland communities that are themselves subject to NRR restoration obligations.

The IWT calls for the following to be incorporated into the NRP:

- Set habitat-specific maximum stocking density limits for all designated sites where overgrazing is identified as a pressure in site-specific conservation objectives.
- Develop a targeted upland habitat restoration scheme that rewards sheep farmers for measurable ecological outcomes rather than incentivising stocking reduction as an end in itself.
- Fully exclude sheep grazing from all areas within national parks and nature reserves where habitat recovery is a management objective, with NPWS given the resources and legal authority to enforce this.
- The NRP should support the development of commonage management plans with ecological carrying capacity targets as a funded priority.
- Explicitly recognise reducing sheep grazing pressure as a prerequisite for achieving restoration targets under Articles 4(1), 4(4), 4(7), and 11 of the NRR, and embed it within the monitoring and effectiveness assessment frameworks under Section 5.

*NRP Reference: Sections 11.1.1, 4.2.8 and Part C Measures 55, 56 and 59.*

## 5.10 The Nitrates Derogation

The Nitrates Derogation is the single most significant policy conflict with the objectives of the National Nature Restoration Plan that is conspicuously absent from the draft. Under the derogation, Ireland is permitted to apply nitrogen from livestock manure to land at rates above the standard 170 kg N/ha limit set by the EU Nitrates Directive — currently at 250 kg N/ha for dairy farms participating in the derogation scheme. Ireland has approximately 7,500

farms operating above the standard limit, concentrated in the dairy-intensive south and south-east.<sup>6</sup>

The consequences for biodiversity and ecosystems are severe and well-documented. Agricultural nutrient pollution — driven primarily by nitrogen and phosphorus from intensive livestock systems — is the leading cause of the failure of Ireland's freshwater ecosystems to achieve good ecological status under the Water Framework Directive. Eutrophication from nutrient runoff degrades rivers, lakes, estuaries, and coastal habitats that are themselves subject to restoration obligations under Articles 4 and 5 of the NRR. The post-dairy quota intensification of the Irish dairy sector has measurably worsened water quality in key catchments, including those containing SACs and SPAs designated for freshwater habitats and species.

The NRP acknowledges in Section 4.3.2.1 that Ireland must identify and phase out environmentally harmful subsidies (EHS). The Department of Public Expenditure and Reform has identified €634 million in annual public expenditure with a probable unfavourable impact on biodiversity. Yet the draft NRP makes no reference to the Nitrates Derogation whatsoever — despite the fact that it is one of the most ecologically damaging policy instruments currently operating in Ireland and one that is renewed at the discretion of the European Commission every four years.

The IWT calls for the following to be incorporated into the NRP:

- Explicitly identify the Nitrates Derogation as an environmentally harmful subsidy under Section 4.3.2.1, with a commitment to its non-renewal at EU level and a national phase-down plan for derogation uptake linked to measurable improvements in water quality and habitat condition in affected catchments.
- Align the NRP's freshwater restoration measures under Article 4 with a binding national nutrient management strategy that sets catchment-specific targets for nitrogen and phosphorus reduction, with enforcement mechanisms that go beyond the voluntary advisory approach currently provided through ASSAP.
- Commission an independent assessment of the cumulative ecological cost of the Nitrates Derogation on Annex I freshwater habitats and species, to be published alongside the next iteration of the NRP.

*NRP Reference: Sections 4.3.2.1, 4.2.8 and 6.1.1.*

### **5.11 Passive restoration (strict protection) in the marine environment**

There was no mention of strictly protected marine areas in the draft plan. Passive restoration was mentioned once and stated this would be particularly useful in offshore areas. Passive restoration will be needed in many inshore areas as enacting active restoration measures, without identifying and removing pressures will use up time and resources and have a high chance of failure.

The IWT calls for the following to be incorporated into the NRP

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<sup>6</sup> <https://teagasc.ie/environment/schemes-regulations/nitrates-derogation/>

- New marine protected area legislation must be enacted without delay and this legislation should include ambitious targets for 30% of Irish waters to be designated as protected with at least 10% of this designated as strictly protected.
- This must be done with early and ongoing stakeholder engagement.
- A cocreation and comanagement approach to marine protected areas should be undertaken.

## **Question 6: Which ecosystems/habitats are missing or underrepresented?**

### **6.1 Semi-Natural Grasslands**

Semi-natural grasslands are among the most threatened habitats in Ireland and are catastrophically underrepresented in the NRP. The combined FRA for all five Annex I grassland types is a mere 54.4 km<sup>2</sup> — ecologically indefensible given the well documented scale of grassland loss to agricultural intensification, drainage, and reseeded since the mid-20th century. The NRP must reassess FRA values and set credible, ambitious restoration targets for species-rich grasslands, lowland hay meadows, machair, and calcareous habitats.

*NRP Reference: Sections 6.2.4, 6.2.6 and 6.3.1.*

### **6.2 Native Woodlands**

Native woodlands cover less than 2% of Ireland's land area and are highly fragmented, yet the re-establishment targets for key habitats — notably Old Sessile Oak Woods (91A0) and Alluvial Forests (91E0) — are already being partially reduced through the proposed use of the Article 4(5) derogation. The IWT opposes the use of this derogation in line with the unanimous recommendation of the Leaders' Forum that the NRP should be implemented in full without recourse to derogations. The NRP must set a clear strategy for identifying clusters of high conservation value native woodlands, using ALEW records, Annex I habitat data, and Coillte/NPWS estate mapping, and expanding restoration outward from these core areas using natural regeneration and locally provenanced planting stock.

*NRP Reference: Sections 6.2.3, 6.2.4, 6.3.2*

### **6.3 Peatlands and Organic Soils**

While peatland restoration receives reasonable coverage in the draft, the scale of ambition must increase significantly. Ninety-two per cent of Ireland's raised bogs remain degraded, and ongoing industrial cutting on non-designated bogs and drainage from afforested deep peat continue to drive losses. The Article 11(4) rewetting targets are inadequate relative to the EPA's assessment that 70,000 hectares of Bord na Móna land must be rehabilitated to achieve net zero in agriculture and land use by 2050. Bord na Móna's absence of any meaningful commitment beyond existing EPA-licensed rehabilitation is a fundamental gap.

*NRP Reference: NRP Sections 11.1.4, 11.2.1, Part C measures 9, 10, 24–26*

## 6.4 Upland and Open Habitats

Upland habitats — including blanket bog, wet heath, dry heath, and montane communities — are inadequately addressed in the context of compound pressures from overgrazing, inappropriate afforestation, and climate change. The NRP must explicitly address the tension between native woodland expansion and the conservation of open semi-natural habitats, developing a coordinated national strategy to ensure both can advance without one undermining the other.

*NRP Reference: Sections 6.2.2, 6.2.4, 6.3.1*

## 6.5 Urban Ecosystems

The urban ecosystem section is underdeveloped to the point of being functionally absent. Ireland is rapidly urbanising, and Article 8 obligations on urban green space and tree canopy cover affect every city and town. No national approach has yet been agreed, no baseline data is presented, and no meaningful measures are proposed. This must be rectified in the next iteration of the NRP.

*NRP Reference: Sections 8.1.1–8.1.4.*

## 6.6 Marine Habitats

In the National Restoration Plan, coverage of marine habitats has been vastly underestimated and hasn't taken into account best scientific evidence. Baseline coverage of habitats must be accurate in order to ensure effective restoration takes place to meet the targets within the law. The plan states that pressures were overlaid with available information on where habitats occurred and this allowed them to estimate the area of habitat not in good condition. For Group 7 habitats the plan states that 46428.67 km<sup>2</sup> are not in good condition. However, the 2024 report by the Marine Institute, Atlas of Commercial Fisheries around Ireland 4th Edition<sup>7</sup>, shows that many forms of bottom contact fishing including demersal seine, dredging, demersal otter trawl and beam trawl occur in a huge percentage of the Irish Exclusive Economic Zone (EEZ).

The pressure data which has been used to estimate the area of habitats not in good condition should be provided for clarity. Vessels under 12m in length are not required to have a vessel monitoring system on board and so the vast majority of Irish inshore fishing vessels and their activities will not be included in this spatial pressure analysis. The plan states that this approach took a precautionary approach which we do not believe to be true as the estimated area is extremely conservative. The ranges provided are also different to those found in different Article 17 habitats directive reports. The reasons behind this significant decrease should be documented and all data supporting this made public for clarity

*NRP Reference: Section 7*

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<sup>7</sup> <https://oar.marine.ie/entities/publication/d03c8fb2-d69e-48fd-bc61-963be7e49f6a>

## Question 7: Which ecosystems are well represented?

The IWT acknowledges that several ecosystem types are reasonably well represented in the draft NRP at this stage:

- Raised bog restoration: The NPWS raised bog restoration programme, the Cessation of Turf Cutting Compensation Scheme, and the Enhanced Decommissioning Scheme represent a substantive suite of measures for raised bog habitats, with meaningful progress on the ground.
- River connectivity: The National Barrier Mitigation Programme represents a credible and funded approach to Article 9 obligations, with 103 projects identified in the first funding call.
- Pollinator habitats: The All-Ireland Pollinator Plan is well-structured, cross sectoral, and provides a strong monitoring framework that could serve as a model for other ecosystem types.
- Blanket bog: The Wild Atlantic Nature LIFE project and the Blanket Bog Restoration Planning Framework represent meaningful investment in one of Ireland's most important but most threatened habitats. However, even in these better-covered areas, the IWT notes that measures remain largely voluntary, monitoring frameworks are not yet sufficiently robust, and the financial commitments to 2032 and beyond are conditional on EU co-funding that cannot be assumed after 2027.

## Section 4 – Delivery & Implementation of the draft NRP

### Question 8: What are the three most critical barriers to implementation?

#### 8.1 Governance and Lack of Coordination

The NRP is being developed through a complex multi-departmental structure, but delivery responsibility remains fragmented across NPWS, DAFM, DHLGH, and multiple agencies. No single accountable body exists to ensure cross-government delivery. The absence of reformed mandates for Coillte and Bord na Móna is an acute governance failure. The NRP requires a dedicated, high-level implementation structure — ideally a Cabinet subcommittee or dedicated statutory body — with the authority to compel action across government departments and State agencies. There is an overwhelming need for political leadership and courage to ensure Ireland's National Restoration Plan works to effectively restore nature. The development of a fit for purpose restoration plan as well as the restoration targets, requires a huge concentrated effort across Government, and it is vital that we do this work before the environmental situation deteriorates further. We believe that those responsible for delivering the plan and restoration measures must be given increased support and resources in order to do this.

*NRP Reference: Section 2.1*

## 8.2 Lack of Funding and Over-Dependence on EU Co-Funding

The financial estimates in the draft NRP acknowledge a total indicative public funding requirement of approximately €6.5 billion to 2032 and €18.7 billion to 2050, yet these figures are highly sensitive to future public funding decisions because the draft assumes current EU co-funding programmes end after 2027. Private finance, estimated at €300–600 million to 2032, is speculative and market-dependent. Ireland needs a dedicated national Nature Restoration Fund, with multi-annual ring-fenced Exchequer commitments, to ensure delivery is not contingent on uncertain EU allocations. During the process of negotiating the NRR text, the Irish government stated that the 3.15 billion infrastructure, climate and nature fund would be used to help fund nature restoration. Since then, this entire budget has been allocated to other projects and no money has been ringfenced for nature restoration. The NPWS must get increased funding and staffing in order to successfully enact restoration measures.

*NRP Reference: Section 4.3*

## 8.3 Data and Evidence Gaps

Ireland lacks the foundational data infrastructure for credible NRP delivery. There is no comprehensive national habitat map, FRA values are underestimated, monitoring programmes are under-resourced, and bilateral engagement between the State, academia, farmers, fishing communities and civil society has been inconsistent. Closing these gaps is not optional — it is a legal requirement under Articles 4(9) and 20 of the NRR. The LIFE SNaP Ireland integrated data platform is a welcome initiative, but it must be adequately resourced and delivered on time. There are many knowledge gaps in regards to marine species and habitats. However, even with these gaps there are many areas which are known to be important for species included in the law. There are many actions which could be implemented immediately to protect these species, such as the cessation of damaging tangle net fisheries in areas where they are found.

*NRP Reference: Sections 5.1–5.5, 6.2.6*

## Question 9 & 10: Can you participate? In what capacity?

Yes. The IWT is committed to participating in the implementation of the NRP in a professional capacity. We are part of the Environmental Pillar which made recommendations through the Independent Advisory Committee. We engage across policy advocacy, citizen science, invasive species removal, community engagement, and education.

We are actively involved in monitoring programmes coordinated by the National Biodiversity Data Centre, the All-Ireland Pollinator Plan, and IAS control initiatives. We seek to be meaningfully engaged in the ongoing development and review of the NRP, including its monitoring frameworks and adaptive management processes. We sit on several committees including the steering committee for the Marine Strategy Framework Directive, the National Biodiversity Forum and the Consultative committee for the Sea Fisheries Protection Agency. We have played an active role in advocating for new Marine Protected Area legislation and have expertise across different issues in the marine environment.

## Section 6 – Final Feedback

### Question 20: Additional Comments

**Derogations:** The NRP Must Be Delivered Without Derogations. The Leaders' Forum — the first and most senior multi-stakeholder consultation convened as part of the NRP process — issued a unanimous recommendation that the plan should be as ambitious as possible and implemented in full without recourse to derogations. The IWT strongly endorses this position. The proposed use of the Article 4(5) derogation for Old Sessile Oak Woods (91A0), reducing the 2050 re-establishment target from 100% to 90%, is directly inconsistent with this commitment. Given that Ireland's native woodland cover is among the lowest in Europe and that 91A0 has suffered severe fragmentation and loss, this is precisely the habitat type where maximum ambition is required — not derogations. The IWT calls for the withdrawal of this derogation proposal. Furthermore, the IWT notes that the Article 4(2) derogation for 'very common and widespread habitat types' cannot legally be applied to any Irish terrestrial Annex I habitat. Ireland's European territory, when correctly calculated to include its marine area, means no terrestrial habitat meets the 3% cover threshold. This point must be explicitly acknowledged in the NRP.

*NRP Reference: Sections 6.2.1, 6.2.3*

#### The Correct Interpretation of Article 4 Targets

The IWT draws attention to a risk of legal misinterpretation in the draft NRP regarding the application of the Habitat Groups approach. While it is permissible to use habitat group-level aggregation to achieve the Article 4(1) targets to 2030 as a practical flexibility, this flexibility does not extend to 2040 or 2050. By 2050, restoration measures must be in place on at least 90% of each individual Annex I habitat type not in good condition. Aggregation across habitat groups at this stage would be legally untenable and would effectively hollow out the NRR's binding commitments. The NRP must clearly set out how per-habitat-type targets will be achieved, and must not allow the 2030 flexibility to become a structural feature of long-term planning.

*NRP Reference: Sections 6.1.3, 6.3.1*

#### Language in the Draft NRP

A careful review of the draft NRP reveals a systematic pattern of non-binding, permissive language in woodland, marine and forestry-related sections that is in direct tension with the mandatory obligations of the NRR. The NRR itself uses 'shall' throughout Article 4 — this binding intent must be reflected in the NRP. The IWT identifies the following specific instances of concern:

Section 6.2.3.4 (Article 4(5) derogation for 91A0): The justification for reducing the Old Sessile Oak Woods re-establishment target from 100% to 90% relies on doubt language: 'it is doubtful that Ireland could reach the 91A0 re-establishment target within the set timeframe.' This appears to rely primarily on delivery and capacity constraints rather than ecological impossibility. The NRR requires demonstrable impossibility, not doubt. Capacity constraints in the forestry and ecological sectors are planning and resource failures, not legal grounds for derogation.

Section 4.2.9 (Agricultural and forestry practices): The draft states that 'no guarantee can be provided in relation to the composition of future Forestry Programmes.' This explicitly disclaims commitment to aligning future Forestry Programmes with NRP obligations — a position that is incompatible with Ireland's legal obligations under the NRR.

Section 4.1.3 - 'Costs to landowners 'may' be mitigated against with different funding schemes'. Dedicated funding must be provided in the NRL and assist with restoration measures, particularly voluntary ones.

4.1.3 - 'Some restoration methods will require active restoration of habitats such as seagrass or oyster reefs, whereas in other areas, particularly offshore, passive restoration is needed which may involve the reduction or removal of pressures.' Passive restoration is needed both offshore and inshore and it will involve the removal of pressures.

Part C woodland measures (Coillte Forests for Nature, NPWS Woodland Restoration, Afforestation Scheme, Reforestation Schemes): Throughout Part C, woodland measures consistently use 'aims to', 'is aiming to', 'can contribute', and 'should' rather than binding commitments. Most critically, Coillte's Forests for Nature Programme — listed as a key delivery measure for the country's largest landowner — states only that it 'can contribute towards the national targets.' This is wholly insufficient and must be replaced with binding, quantified, time-bound commitments. The IWT calls on NPWS to audit all permissive language in the woodland and forestry sections of the NRP and replace it with clear, binding commitments that accurately reflect the 'shall' obligations of the NRR. Where measures cannot be made binding without legislative change, the NRP must identify those legislative changes as actions with specific timelines.

*NRP Reference: Sections 4.1.3, 4.2.9, 6.2.3, 6.2.4, Part C measures 6, 11, 61–65*

### **The Need for Genuine Ambition from State Bodies**

The IWT is deeply concerned that the two largest public landowners in the State — Coillte and Bord na Móna — are included in the NRP's list of measures without any evidence of reformed mandates, binding commitments, or adequate scrutiny of their current activities. Coillte continues to manage 73% of its estate as commercial conifer plantation and operates within a legal mandate that prioritises commercial forestry. Bord na Móna has made no commitment to restoration beyond its existing EPA licensing obligations. The inclusion of Coillte's Forests for Nature Programme as a key measure, while Coillte simultaneously clearfells forests in Hen Harrier SPAs and afforested peatlands, is insufficient. The State must reform these bodies' mandates, issue binding letters of expectation, and redirect a portion of their commercial revenues into a ring-fenced Nature Restoration Fund.

*NRP Reference: Part C Measure 11, Section 4.3 and Section 6.2.3.*

### **The Role of the NRP in Reforming Broken Systems**

The NRP must be understood as more than a list of programmes — it must drive systemic change in how Ireland manages its land, water, and forests. The root causes of biodiversity loss in Ireland — agricultural intensification, plantation forestry on peatlands and uplands, historic drainage, and weak enforcement — have not been fundamentally addressed. The next iteration of the NRP must set out how Ireland will reform these systems, not merely

ameliorate their worst effects. This includes alignment with Common Agricultural Policy reform, the development of a post-2027 Forestry Programme that is fully compliant with NRR obligations, and a clear strategy for reducing environmentally harmful subsidies — currently estimated at over €634 million annually with potential unfavourable impacts on biodiversity.

*NRP Reference: Sections 4.2.8, 4.3.2*

## **Fisheries and Aquaculture Management**

The current system for protecting marine habitats is falling short, as highlighted by the recent Article 17 Habitats Directive report. Over the last two reporting periods many habitats have declined and there have been no significant improvements documented. Reasons for this include greater knowledge becoming available but also the lack of management of pressures.

We do not believe that the current system for managing fisheries activities is in line with the requirements of the EU Nature Directives. Fisheries Natura Declarations are issued by the Department of Agriculture Food and the Marine to manage planned fisheries. Only 11 have ever been initiated and the geographical scope and ambition of these declarations are often lacking and fall short of what is needed to protect the marine environment. Most fisheries do not undergo Appropriate Assessments as they are not considered a ‘plan’ even though they occur in and around Natura sites. Fisheries which are not considered a plan should undergo a risk assessment under the European Union (Birds and Natural Habitats) (Sea-Fisheries) Regulations 2013 (S.I. 290 of 2013)<sup>8</sup>. The last available report of these risk assessments that is available online is from 2015 and it’s hard to find information on any further update that covers all fishing activity around Natura sites. This 2015 report also excludes huge areas of Ireland’s inshore area and it is not clear that any management plans and ongoing monitoring were put in place in response to the findings of the report. Information on any ongoing risk assessments and adaptive management for fishing activity being conducted by the Marine Institute should be made publicly available and be referenced in the plan. All fisheries activity around protected areas and areas for restoration should undergo environmental assessment whether this is done as an Appropriate Assessment or an in depth risk assessment.

Allowing activities to continue which cause damage to marine ecosystems, not only impacts the health of the marine environment, it also impacts the sustainability of the fisheries sector. It has been shown globally that well managed MPAs have a positive economic impact on fisheries<sup>9</sup>. All stakeholders should be involved in these processes from the beginning and all available information on how fisheries are currently managed should be easily and publicly available.

In regards to aquaculture this sections states, *‘appropriate assessments are undertaken on a bay-by-bay basis, with aquaculture projects only authorised if they (individually or in combination with other plans or projects) do not give rise to significant adverse impacts on the integrity of the applicable Natura 2000 sites, having regard to their conservation objectives’*. Under the Fisheries Act section 19A (4), there is a legal

<sup>8</sup> <https://www.sfpa.ie/What-We-Do/Sea-Fisheries-Information/Natura/Natura-Framework-Legislation>

<sup>9</sup> <https://scientiamarina.revistas.csic.es/index.php/scientiamarina/article/view/5526/3016>

loophole allowing aquaculture developments to continue operating while they wait for the renewal of licenses. This activity can continue without undergoing environmental assessment, which we believe should not be permitted and must be brought into line with EU law.

There are many parts of EU environmental laws which are not being fully implemented in Irish waters. Article 17 of the Common Fisheries Policy should be fully utilised and ensure that low impact fishing vessels are incentivised and there is a fair share of quota allocated across Irish fishing fleets. This will not only help to improve small scale fisheries and coastal communities' economy, but it will help protect the environment. Fairer quota share will lower the risk of a dependence on more damaging fishing techniques or a reliance on non quota species. A breakdown of how exactly quotas are divided across Irish fishing fleets should be provided and it should clearly show how each criteria is weighted. Environmental impacts such as bycatch, seabed integrity, food web integrity and carbon emission should all be included. Funding from EMFAF should be available to help fishermen with the transition away from high impact gears if the fishing method poses a threat to the protection and restoration of the marine environment.

### **Joint Recommendations under the Common Fisheries Policy**

Joint recommendations will be needed in Ireland's offshore ecosystems for habitats included in groups 1 - 6 and not just soft sediments included in group 7. The draft plan does not acknowledge this and says, '*Depending % target restoration areas agreed on in Group 7 habitats, there are likely areas where restoration measures are needed that coincide with areas fished by multiple member states.*' This has made allowances for the plan to not include the measures which will need to be undertaken to initiate JR's and undermines the seriousness and time sensitivity of the situation. The JR process is a long and difficult one and there is no time to waste in starting the process. Ireland has many cold water corals in its offshore area which have been damaged from bottom towed fishing and these habitats are not subject to a lower threshold still to be decided. Ireland will need to consult with the North Western Waters Advisory Council ahead of initiating JR's and this measure should have been included to show that this legal requirement of the law is a top priority for the Irish Government. Without initiating JR's, Ireland will not only fail to restore offshore marine ecosystems, it will also fail in reaching the globally agreed and legally binding target of having 30% of its waters effectively protected by 2030.

*NRP Reference: 7.1.4.1*

### **Restoration of habitats of species referred to in the law**

This section of the plan failed to document any ambition in restoring and reestablishing the habitats of the species referred to in the law. There is a legal obligation in the NRR in Article 5(5) that states, '*Member States shall put in place restoration measures for the marine habitats of species listed in Annex III to this Regulation and in Annexes II, IV and V to Directive 92/43/EEC and for the marine habitats of wild birds falling within the scope of Directive 2009/147/EC that are, **in addition** to the restoration measures referred to in paragraphs 1 and 2 of this Article, necessary to improve the quality and*

*quantity of those habitats, including by re-establishing them, and to enhance connectivity, until sufficient quality and quantity of those habitats is achieved.'* The draft plan stated that *'Further work required to link each species to the relevant EUNIS habitat and/or associated pelagic waters.'* This was extremely disappointing to read as there has already been a huge amount of work done identifying species and the habitats needed for their survival.

Habitat restoration for the species included in the law should take place in the areas where these species are known to occur and ensure ecologically connected habitat corridors for wide ranging species as called for in Article 5(8) of the law. Examples of species of which their habitats are known include the angel shark and atlantic salmon. Activities which impact the survivability of these species must also be looked at and mediated against with fair supports to people to allow a transition away from damaging activities. We refer to the Environmental Pillars submission which includes work done that identifies EUNIS habitats and those within the NRR which are used by the species mentioned in the law. NPWS should utilise the knowledge which is available from experts, civil society and fishing communities in regards to identifying the most important areas for restoration.

## **Conclusion**

The Irish Wildlife Trust urges the National Parks and Wildlife Service and the Government of Ireland to use this consultation process as a catalyst for genuine ambition. Ireland has an opportunity to lead in nature restoration — but that will require political courage, reformed institutions, robust funding, and a plan grounded in ecological reality rather than administrative convenience.