

Summary of Public Consultation Process for Ireland's National Biodiversity Plan 2017-2021

The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs

April 2017

Ireland's Vision for Biodiversity: "That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally."

Overview of the Plan

Ireland is party to the 1992 United Nations Convention on Biological Diversity (CBD), which is focussed on 'the conservation of biological diversity and the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources'. To this end, the CBD has identified five Strategic Goals and 20 Biodiversity Targets and each participating country must also develop national strategies and action plans for the conservation and sustainable use of biodiversity. Achieving biodiversity targets would also be a significant contribution towards achieving the 2030 Agenda for Sustainable Development and its Sustainable Development Goals (SDGs) as well as the Paris Agreement on Climate Change.

Ireland's National Biodiversity Action Plan 2017-2021, the third such plan for Ireland, captures the objectives, targets and actions for biodiversity that will be undertaken by a wide range of government, civil society and private sectors to achieve Ireland's Vision for Biodiversity as well as its international commitments. This Plan provides a framework to track and assess progress over a five-year timeframe from 2017 to 2021. The targets in the Plan address issues ranging from improving the management of protected areas to increasing awareness and appreciation of biodiversity and ecosystem services. To achieve these targets, seven strategic objectives were identified in the second National Biodiversity Action Plan. These objectives have been retained for the new Plan so that we can continue to build on the progress made in recent years. The next Plan 2021-2030 will align fully with the next CBD Strategic Plan and EU Biodiversity Strategy and will have a long term Vision to 2050.

Consultation process

The consultation process for Ireland's National Biodiversity Plan 2017-2021 was a two-stage process consisting of a) consultation with the Biodiversity Working Group and Biodiversity Forum in initial scoping, development, and drafting of the Plan, and b) publication of the draft Plan on the NPWS website and open invitation for views of the public.

Biodiversity Working Group and Biodiversity Forum: An Interdepartmental Working Group on Biodiversity was established in 2012 to strengthen engagement of key Government Departments and State Agencies in the implementation of Ireland's biodiversity targets. The Biodiversity Forum was established in the lifetime of the first National Plan to encourage engagement from non-governmental organisations; the forum re-convened in 2016 with Prof Yvonne Buckley as Chair. Both groups convened a number of times in 2016 to input to initial scoping, development, and drafting of the Plan.

Wider public consultation: The Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs invited views of the public on the draft Plan on 21st of December 2016. Interested organisations or individuals could submit written observations via a SurveyMonkey questionnaire on the National Parks and Wildlife Service website or, alternatively, by email and postal written submissions. Observations could be made in English or Irish. The consultation window was closed on the 9th of February 2017. In addition to the normal notification on its website, the Department undertook a series of actions to raise awareness of the consultation process including: newspaper advertisements and regular tweets. 88 external submissions were received and all those which we have permission to publish are now available on the Department's website (www.npws.ie). The submissions received have informed the preparation of this response document.

Consideration of comments

The comments received were grouped into broad headings and responses formulated by NPWS. These were considered by the Biodiversity Working Group and Biodiversity Forum at their meetings on 13th and 16th of February, respectively. Specific comments were sent to relevant sectors for comment or observation.

The key issues raised through Ireland's National Biodiversity Plan 2017-2021 public consultation were: partners, stakeholder engagement, funding and resources, aspiration, effectiveness of policy, changes from the last plan, gaps and proposed new Actions, finance plan, review and indicators. For further details on these, please see below:

1. Partners

Biodiversity interacts with many aspects of society; biodiversity is part of, *inter alia*, art, heritage, culture, health and wellbeing, education, tourism, circular economy, disaster risk reduction, food security. Many submissions highlighted the fact that there can be a variety of actors involved in dealing with a specific action. In our opinion, a government department should not be the sole voice on how to engage on each action, for example local groups can be mobilised by their own self-interest in local conservation issues.

Stakeholders can come together in a variety of forms. eNGOS can form umbrella groups (e.g. SWAN), regional partnerships can be formed (e.g. SECAD, Dublin Bay Biosphere), community groups can come together (e.g. Irish Rural Link). Many of these organisations expressed their support for specific actions within the Plan. To ensure inclusivity the Partners identified for each Action have been expanded to include relevant stakeholders where appropriate. A paragraph has been included in the introduction to explain the types of Partners involved with the implementation of the Plan.

2. Stakeholder engagement

The importance of the engagement of local communities was highlighted in several submissions, a sentiment with which the Department agrees. Engagement by local communities is of course of great importance in biodiversity conservation. Furthermore, without an awareness of the importance of biodiversity to human well-being, citizens and stakeholders are not likely to take the steps needed to mainstream biodiversity considerations into their daily lives and practices. Lack of public awareness also contributes to the relatively low political priority given to biodiversity issues.

The means to support the role of Biodiversity Officers to engage local communities through training, conservation action etc. will be explored.

3. Funding and Resources

The lack of a dedicated funding stream for biodiversity was noted in several submissions. However, funding can come from many sources (e.g. Government Departments and Agencies and Research Institutes, EU funding streams and the Heritage Council). A single dedicated funding stream may not be the best option. A section on funding has been included in the Introduction that is an update to the information provided in the last Plan.

There were calls for more resources to be assigned to NPWS to enable the organisation to carry out its statutory role and to improve communications. The important role of Biodiversity Officers to enhance mainstreaming within Local Government was highlighted. The plan can encourage additional resources to be sought in key areas across the public sector, however it is beyond the mandate of the plan to specify staffing levels. Work force planning is ongoing in all sectors.

4. Aspiration

Some actions were considered by some respondents to be too aspirational. However, we will always be faced with emerging concepts that may take time to be enshrined in legislation, for example moving towards “No Net Loss” or “Offsetting”, both concepts also incorporated into the EU Biodiversity Strategy. These new approaches may allow for broader conservation measures beyond the Natura network of protected areas.

5. Effectiveness of Policy

Another theme in the submissions received highlighted issues related to accountability of environmental assessment processes (Environmental Impact Assessment, Strategic Environmental Assessment, and Appropriate Assessment) and issues with the implementation of Government policy or the enforcement of Regulations.

It is not within the mandate of the Plan to give an instruction to review the implementation of existing processes but the comments were forwarded to the relevant authorities. The status of biodiversity will continue to be assessed. The pressures on biodiversity will continue to be monitored and reported. The outcome of these assessments will highlight any potential weaknesses or gaps in the regulatory process. These processes are likely to have their own review mechanisms that should be fed into.

6. National Habitat Map

Several submissions queried the progress and ownership of the proposed National Habitat map. The following is a summary of the current situation: In 2011 a working group was established to explore the options around the development of a national Landcover/Habitat Mapping programme. This group now comprises the EPA, DAHRRGA, the Heritage Council, OSi, DAFM, Teagasc, the GSI and the OPW. This programme is based on a framework that would be overlaid on the spatial boundaries of OSi’s Prime2 database, coupled with remote sensing and other available datasets. Work to date has concentrated on a common standards framework and further investigation of the benefits of such a programme and its economic value. The work is ongoing.

7. Changes from the last plan

The major changes from the last plan relate to Sectoral Biodiversity Action Plans and the question of designating proposed NHAs.

The Biodiversity Working Group was set up to oversee the implementation of the last Plan. Most members of this group expressed a preference for their organisations to be more actively involved in the National Plan rather than to develop individual sectoral Plans.

In relation to the NHAs a decision was made with in DAHRRGA to focus the resources available on the completion of the designation process for the Natura network and to work through Conservation Objective setting for sites, and a process to identify the Conservation Measures required to effectively safeguard the network. The collection of information on sites to be considered for potential designation as Natural Heritage Areas is ongoing and a new Action has been included to reflect this (Table 1).

8. Gaps and proposed new Actions

It is recognised that soil biodiversity is not adequately covered by the current Plan. We will endeavour to address this gap in the next iteration of the Plan.

Traditional breed societies are calling for more action on genetic resources that they do not believe are sufficiently dealt with under the Plant and Animal Genetic Resource Strategies.

Several additional pressures were highlighted as being important (e.g. light pollution, urbanisation, monoculture); it is not possible to deal with an exhaustive list of pressures therefore an overarching Action was formulated to include all significant pressures: “Enhance knowledge of the most significant direct and indirect causes of biodiversity and ecosystem service loss including combined and cumulative stressors; develop and test prevention and mitigation options”, Target 1 also includes the requirement for biodiversity considerations as part of the planning process.

Environmental legislation should always be reviewed to ensure that it is fit for purpose and to determine whether there are any gaps (for example dealing with IAS in the pet trade), and an Action has been formulated to review existing legislative and identify any potential gaps (Table 1).

Submissions were received concerning climate change and biodiversity. Ireland’s national policy in response to climate change is the Climate Action and Low Carbon Development Act 2015. This Act provides for preparation and approval of plans by the Government covering climate change mitigation and adaptation with the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy by 2050. The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs is the lead department charged with the development of a biodiversity sectoral action plan. A new Action has been included to reflect progress on this sectoral action plan. It is important to note that biodiversity should be considered as an important component of other sectoral plans e.g. the role of wetlands in flood defence.

There was concern over the lack of commitment to new Species Action Plans during the life time of the Plan. This has been recognised and a new Action has been formulated (Table 1).

A new Action has been included related to the recently initiated Curlew task force which aims to address the issues causing the decline in the species (Table 1).

As part of the prioritisation process for biodiversity expenditure the Prioritised Action Framework will be updated to reflect the next assessments of Habitats and Species of European concern (Table 1).

To ensure we are considering novel techniques an Action has been included to encourage the use of genetic barcoding (Table 1).

Development of Synthetic Biology is evolving at a rapid pace. An Action has been included to encourage research to consider the implications on biodiversity (Table 1).

Table 1. New Actions

Objective	Action	Timeline	Partners
1	Review existing legislative and identify gaps	2017-2021	Relevant Government Departments
1	Publish Climate Change Adaptation Strategy for Biodiversity	2018	DAHRRGA
1	Develop a Green Infrastructure at local regional and national levels and promote the use of nature based solutions for the delivery of a coherent and integrated network	2017-2021	Local Authorities
2	Continue to collect information on sites to be considered towards protection and enhancement of the Natural Heritage Area network.	2017-2021	DAHRRGA
2	Encourage the use of advances especially in barcoding and genomic research to acquire relevant knowledge on Irish species	2017-2021	Academia, Research Institutes, Relevant Public bodies
2	Research and gather information on biodiversity implications of synthetic biology and novel genetic techniques to inform policy and regulatory issues.	2017-2021	Academia, Research Institutes, Relevant Public bodies
4	Work with the horticultural and pet trades to prevent the introduction and spread of IAS	2017-2021	DAHRRGA, NBDC
6	Set up a Curlew task force	2017	DAH, DAFM, BWI, relevant civil society stakeholders
6	Draw up threat-response plans for selected species of conservation concern	2017-2021	DAHRRGA
6	Review and update the Priority Action Framework	2018	DAHRRGA

9. Finance Plan

Some comments were received that a National Plan should be supported by a financial plan. As already noted, biodiversity interacts with many sectors of society. Determining the financial cost of, *inter alia*, research, survey, designation, maintenance, restoration, compensation, training, enforcement and engagement is a considerable task. NPWS has commissioned research to identify current expenditure on biodiversity and recommend financial mechanisms to ensure the

conservation of biodiversity. This outcome of this research will allow us to work towards the development of a financial plan.

10. Review

Baseline information was provided as part of the consultation process. This information was gathered by members of the Biodiversity Working Group as part of an ongoing review of implementation. It is recognised that this baseline is not comprehensive and it will not be included in the final document. NPWS will seek updates on various actions from a wider audience as part of the interim review of the new Plan. Midterm targets have also been removed but will be considered as part of the interim review.

11. Indicators

Many submissions requested modification, addition, or deletion of the performance indicators. It is recognised that some indicators are outcome indicators which should be examined in the context of the changing trends in the status of biodiversity.

Finally, to ensure coherence and readability of the Plan, repetitious actions have been merged e.g. guidance, collaborative research, citizen science, and there has been a movement of actions between objectives to ensure a better fit.

Conclusion

The Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Heather Humphreys, T.D., is encouraged by the level of interest and broad support for the Plan. The public consultation process has actively informed the final draft of Ireland's National Biodiversity Plan 2017-2021. NPWS has refined and modified the final text of the Plan taking on board comments as much as possible.

The Minister would like to thank all those organisations and individuals who contributed to the consultation process, whether by making written submissions or being involved through the Biodiversity Working Group and Biodiversity Forum. These contributions have constituted an important input into the development of Ireland's National Biodiversity Plan 2017-2021 and has resulted in an improved Plan.

National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.

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