

Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
General Comments	
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N/A	In my opinion, your type of biodiversity plan is constrained by the rigid barriers imposed by the existing local government structure. Looking at Dublin Bay, for example, we see how that great biodiverse area is under the control of several counties and agencies, all with different agendas.
	This new plan must engage more closely with the context of the planning system. For example, within the Dun Laoghaire-Rathdown county plan, we see how the bay is part of a Proposed Special Protection Area. It is, at the same time, that area above the low tide line is within a Proposed Natural Heritage Area. These are great designations but they need the wider support your plan can offer.
	Dublin Bay is a marvellous place to see wild birds such as the flocks of geese that spend the winter in Ireland. Their support needs two reforms. Firstly, high tide roosts have to be secured within easy reach. This means the protection offered by expansive institutional lands or large sports grounds, where marauding dogs can be seen at a distance. These parcels of open land are under considerable development pressure and must therefore be designated under the development plan regime for that specific purpose. This may require the issuing of specific directives by the Minister for the Environment.
	Secondly, as part of the comprehensive approach I refer to, we have to control the damage being done by marauding dogs. All too often, we have to watch helplessly on the beach as irresponsible owners allow their dogs to hunt birds such as geese that may just have arrived in Ireland, hungry and exhausted after a long flight. You might consider allowing honest citizens to help out, verbally requesting those perpetrators to control their animals.
	The reason for these reforms is clear. We learned many decades ago that the conservation of wild birds requires more than mere safeguarding of nests. Conservation must embrace their feeding and roosting areas. Inclusion of these two essential reforms would prove that your new plan represented progress.
	I confirm that I will attend the next Biodiversity Working Group meeting on 13/02/2017.
	I have asked the various divisions around the Department of Transport, Tourism and Sport for any updates to the draft Plan. See details below:

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	Obs from Roads Division (DTTAS):
	Please find attached re proposed change to Action 4.4.3
	OLD TEXT
	Roads Division of DTTAS uses native planting in landscaping national road schemes.
	NEW TEXT
	Native planting is used in landscaping national road schemes.
	Obs from Irish Maritime Administration / DTTAS:
	Regarding Target 4.4.1 (Harmful invasive alien species are controlled and there is reduced risk of spread of new species). That section would seem to be a suitable location to include the International Ballast Water Management (BWM) Convention.
	The BWM Convention reached its ratification criteria on the 7th September 2016 and will enter into-force on the 8th September 2018. It is Ireland's intention to ratify the Convention (Have it entered into Irish law) prior to the international entry into force date, if possible. The Department of Transport, Tourism and Sport; Irish Maritime Administration is responsible for the transposition into Irish law and the effective enforcement of the BWM Convention in Irish waters.
	The BWM Convention requires the exchange or treatment of all ballast water carried on internationally trading ships. The aim of the BWM Convention is to eliminate the spread of harmful / invasive marine species, bacteria and pathogens that are transported in the Ballast tanks of all internationally trading ships.
	Introduction
	The National Biodiversity Data Centre welcomes the opportunity to make a submission on the production of the draft 3rd National Biodiversity Action Plan 2017-2021.
	Having reviewed the proposed actions contained in the Plan, the National Biodiversity Data Centre is of the opinion that if the actions are fully implement they will contribute very significantly to improving the conservation of biological diversity in Ireland. The National Biodiversity Data Centre is fully committed to assisting the implementation of the actions to which it is assigned, subject to the observations outlined below.

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	<p>The submission from the National Biodiversity Data Centre focusses on two areas; first, it makes some general observations on the plan, then makes more specific observations on the actions to which the Data Centre is assigned some responsibility to implement.</p> <p>General observations</p> <p>1. Funding</p> <p>It is notable, and surprising, that the draft 3rd National Biodiversity Action Plan makes no mention of adequate resourcing to facilitate implementation of the identified actions. Many of the actions cannot be implemented adequately without the additional resources being made available. Ideally, the Plan should incorporate fully costed actions, and this then used as a vehicle to seek increased funding for its implementation, and by extension to make the case for increased funding to the biodiversity sector to assist meeting our national and international obligations as they relate to conserving biodiversity. Failing that, the Plan should outline what resources are available realistically, so that the ambitions of the partner organisations can be tailored accordingly.</p> <p>2. Making the case for the conservation of Ireland's biodiversity</p> <p>The opening sections of the plan set out well, the international and national arguments for greater investment in the conservation of Ireland's biological diversity. This section would benefit greatly if more concreted examples could be provided of how implementation of the Plan would benefit people's everyday lives. A statement is made that there are many other less obvious ways in which nature sustains us, for example, contributing to our heritage, health, well-being, enjoyment and national identity. It would be good to provide specific examples of these benefits.</p> <p>3. Greater engagement with civil society</p> <p>The 3rd National Biodiversity Action Plan is largely a plan for the public sector, yet achieving the objectives of the Plan requires significant support and buy-in from civil society. There should be some tangible action, or actions, which specifically address how it is proposed to engage more actively with civil society; to give civil society a greater voice and to mobilise greater involvement to assist delivery of some of the proposed actions.</p> <p>4. Monitoring and evaluating the implementation</p>

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	<p>The National Biodiversity Action Plan sets out a proposed process for monitoring and evaluating the implementation of the Plan (Page 11)The process appears to suggest that the National Biodiversity Data Centre will again play a role in collating information to produce the mid-term evaluation of the 3rd National Plan. If it is indeed the intention of the Department to work with the National Biodiversity Data Centre to report progress with delivery of the actions in the Plan, it would make far more sense to establish a clear reporting process at the outset, so that ongoing progress with implementation of the actions could be tracked on an annual basis. This would ensure that there was a clarity up front on what the reporting obligations are, and a timescale. Reports on progress with delivery of the actions would be presented on an annual basis by the National Biodiversity Data Centre to the Biodiversity Working Group. This would implement a more efficient process, and it would complement the reporting required to update the National Biodiversity Indicators. Providing a clear role to the Data Centre for tracking progress with delivery of actions in the Plan would in no way detract from the role of the Department as the ‘institute responsible for oversight of the implementation of this Plan’, rather it would just streamline the administration process. 4. Clarify role of NBDC in monitoring/evaluating this plan - a process comment rather than suggesting edits to the plan .</p>
	<p>Thanks forthe opportunity to look at this. I have a few items that I believe should be incorporated somewhere.</p> <p>1) Baseline and monitoring surveys of habitats, species and sites to gather data, to assess status and to advise necessary conservation measures.</p> <p>2) Revision of the Flora (Protection) Order and Schedule 5 of the Wildlife Act.</p> <p>3) Continue to gather information on sites to be considered for potential designation as Natural Heritage Areas.</p>
	<p>As I suspected it appears that the comments I sent to XXXXXX concerning CITES did not make it into this version. Specifically it is incorrectly referred to in a number of places. Once and for all it is the Convention on International Trade in Endangered Species of Wild Fauna and Flora!</p> <p>The other issue relates to the need to mention the EU Action Plan against Wildlife Trafficking and that the actions within this plan will be incorporated into our national CITES enforcement plan (2017-2021) that is currently in preparation. I have attached sticky notes to the document you sent to indicate the sections that need to be corrected.</p>

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	Any problems following my comments let me know.
	Thanks for the Draft document which I have read a couple of times and attach herewith a marked-up copy with a few suggested alterations.
	It is a very strong document and I commend Eugenie for that – super job.
	If there is one criticism – and its only really nuance rather than content -I would say that on balance the report fails to adequately attribute the full extent of the agri/agri-food sectors responsibility for the deterioration in biodiversity in Ireland. Personally I would have emphasized this point more, but that’s because I don’t have to deal with the farming lobby.....!
	I suppose also the health benefits (in respect of overall societal advantages) could also have been more clearly articulated
	But that’s just picky at this stage!!
	Congratulations on a great document!
	My overall comment is that the plan is very good, well written and clear.
	I have a few comments on the existing text which relate to these paragraphs
	Please find attached my annotated comments on the latest draft national Biodiversity Plan. The document has come on really well since the last version. I have suggested some minor editorial changes/corrections and a few additional issues/specific points. I hope they are useful.
	I have also taken the liberty of suggesting a few additional references that might be useful from our own work.
	Look forward to the next meeting in january.
	Kind regards and best wishes for the christmas season
	Thanks for the opportunity to input to the plan. I think you've done a great job in pulling it together! In the attached, I have made some comments and suggested edits, particularly in the introductory sections and on the sections in which I have some direct expertise. By all means get in touch if there are any other points or questions you'd like further input on. I will aim to look more closely at the other sections during the wider consultation, but have run out of time for now.
	Best wishes for Christmas and the New Year!

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	<p data-bbox="208 268 1370 568">Please find attached the BirdWatch Ireland response to the public consultation on the BAP. We thought it would be helpful to insert comments directly into the paper that was circulated before Christmas and we trust that this is ok. This has been circulated to the staff at BirdWatch Ireland (whose staff include experts in national survey and monitoring programmes, upland habitats, , waterbirds, seabirds, fisheries and impacts on birds and other biodiversity, farmland birds, agriculture and agri-environment schemes, raptors and wildlife crime, national and international policy, casework and development proposals and compliance with EIA, AA and SEA) have spent a significant amount of time reviewing the document and we really hope you find this work useful.</p> <p data-bbox="208 579 1346 646">Firstly, well done on pulling this together which must have been quite a challenge. You will see comments and suggestions from BirdWatch Ireland staff within the document.</p> <p data-bbox="208 657 1384 874">BirdWatch Ireland is very concerned that there is no mention of the Birds of Conservation Concern in Ireland Red List in the BAP. Please find attached the peer reviewed paper on this and the link to the actual list. And here is the reference for it: Colhoun K. &amp; Cummins, S. 2013 Birds of Conservation Concern in Ireland 2014-19. Irish Birds 9:523-544. Wherever there is text on the status of birds in Ireland, or the status of biodiversity, the red list for birds should also be included. It is Ireland's longest red list to date by the way.</p>

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	<p>In relation to SEA under the text for Objective 1, it is important to note that the SEA Review found significant shortcomings in the way SEA is undertaken in Ireland. The EPA website itself when presenting information on the Review states that “a number of challenges have been identified which are acting as barriers to ensuring effective implementation across the board”. Also this review happened in advance of the catastrophic SEA process (not) undertaken for Food Harvest 2020 where the European Commission got involved and the little better SEA process for Food Wise 2025 which BirdWatch Ireland has commented on in submissions. Care is needed with the statement in the BAP that SEA is fulfilling its environmental goals. Perhaps it would be more accurate to state that where accurately implemented, it is a powerful tool to help achieve sustainable development. The Executive Summary of the SEA states that ‘As most plans for which SEA has been undertaken have only recently been implemented and SEA related monitoring has not taken place for a sufficient timeframe, if at all, it remains unclear whether SEA is leading to widespread positive environmental outcomes and sustainable development and preventing adverse environmental effects on the ground’. Care is needed with the statement within the BAP.</p> <p>Wishing you the best with the finalisation of the BAP.</p> <p>Kind regards,</p>
	<p>Firstly let me wish you and all the NPWS staff a Happy New Year.</p> <p>Whilst welcoming this opportunity to input into the Draft National Biodiversity Plan consultation, we are very unhappy with the timing of the consultation and the lack of notification regarding the launch of the consultation. It was only by accident that I discovered it was taking place. As you will be aware the Aarhus Convention requires notification of the public and concerned civil society organisations together with an absolute minimum of 4 weeks and for a document of this complexity even more. 4 weeks over the Christmas and New Year holidays without any notification does not fulfil these requirements. Our members now have 2 weeks and 3 days to respond.</p> <p>In order to ensure a meaningful response to the call we ask you to extend the deadline to 20th February.</p>

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	Regardless of the awareness or otherwise of the IEN members, this public consultation does not comply with the provisions of the Aarhus Convention.
	<p>Waterways Ireland welcomes the opportunity to comment on the new draft National Biodiversity Action Plan. Waterways Ireland manages the recreational use of Ireland's major inland navigable waterways including the Shannon Navigation, Shannon-Erne Waterway, Grand and Royal Canals, Barrow Navigation as well as the Erne System and Lower Bann Navigation in Northern Ireland. These waterways provide significant ecosystem services (recreation, biodiversity, tourism, health, social inclusion, etc.) and offer the public and tourists unrivalled opportunities to experience the wealth of flora, fauna and habitats that have resulted in many SAC, SPA and pNHA designations being afforded these sites. Our organisation is committed, as outlined in its Heritage Plan 2016-2020, to "identify and protect the unique waterways heritage and promote its sustainable use for the enjoyment of this and future generations."We strongly support the objectives of the draft Plan, in particular the call for shared responsibility across all sectors and the importance of public engagement in raising awareness of biodiversity. Waterways Ireland, as a cross border body, is in an ideal position to help support the call to strengthen international governance; in particular with Northern Ireland. We currently undertake many of the actions as outlined in the draft Plan, some of which are outlined below. (SEE REST OF SPREADSHEET)</p>
	<p>Thank you for the opportunity however limited and belated to respond to the Draft National Biodiversity Plan Consultation. It is a most interesting statement of the vision and objectives of successive BAPs, EU Directives, CBD and SDGs and their history and implementation.</p> <p>I make some general observations, I hope are considered, contribute to ongoing discussion and review and are of help. I would require more time and resources to reference more specific examples but do offer some examples to illustrate concerns and deficits. The Plan from outset is lacking a budget and provision for oversight and review.</p>



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	<p>The Draft BAP is foggy from the outset I it's Vision and Objectives are highly understated, dumbed down even! It lacks clarity and purpose and misses the opportunity to use brave language and face the reality, accepted by prominent and mainstream Biologists, that we are already in the 6th Mass Extinction and BioD loss is accelerating faster than all previous.....the Anthropocene. The muted language, poor mainstreaming of cross cutting objectives and myopic approach, fails to convey the urgency of necessary actions. ( The NPWS needs to become "the mouse that roars", engages with citizen science and community and be resourced to capacity to fulfill it's objectives....not left languishing on budgetary remains, unable to attend meetings or do more than desk exercises, the poor relations of public service !!).</p>
	<p>The BAP is at it's most honest and helpful highlighting the missed targets of it's predecessors, the need for "catch up" and collapses in absence of scheduling deliverables, budgeting and allocating resources. BioD Loss and Climate Action require more and matching resources and attention and resources and X-referencing is not addressed.</p>
	<p>From Geritt van Gelderen's prophetic rallying call, " For Nature Conservation to succeed requires Nations Full of Nature Watchers " to SDG goals of today and Laudato Si, as guidelines for mainstreaming and X-cutting objectives, the BAP could have addressed issues in it's Vision such as , Reduced working hours, more holidays, improved public transport and access to nature, in the interest of personal and societal well being, environmental health and BioD oversight.</p>
	<p>It is on the point of resources, implementation and engagement that the BAP collapses and fails to go further than it's predecessors. On the surface it cross references but fails to draw together in any depth the objectives of Sustainability; HOOW; FH2020; Origin Green; FW 2025; WSSP: in largely uncostered , untested and unassessed exercises, in many cases incompatible with BAP or SDG objectives.</p>
	<p>With greatest respect to contributors to BAP ( did not include Irish Seal Sanctuary, ISS/IBI or others), it represents "known knowns; known unknowns; and unknown unknowns most helpfully and at it's most valuable highlights data deficits, historic failings and current shortcomings and to be effective it must state the problems and urgency clearly and approach solutions from different intellectual framework to that of many agencies who created them in 1st instance ( Ag, Fisheries, drainage etc...)</p>
	<p>Some examples illustrate:</p>

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	<p>Mainstreaming, reducing pressure, improving status, enhancing implementation and benefits of BioD are not compatible ; with Irish Water's plans for Shannon and ongoing raw effluent discharges: IFI role as lead Irish Rep to NASCO fails to fully represent interests of anadromous/catadromous species; FH 2020 : FW2025: Origin Green ; derogations for emissions and cattle herd; fishing unsustainably to feed caged fish; Aquaculture licences approved without inspection or assessment; under resourcing of NPWS ; and largely unacknowledged ENGO, citizen science and community input (...eg and ISS specifically omitted for listing/reference , despite national role/PDV alert, 30 years wildlife rehab and outreach, fisheries inputs, DSD, 1st Seal P.M.s with Vet college.....indeed NPWS claims to be monitoring seals on resources and time allocated is largely unjustified and credit to ISS and communities, where eg. seals of D.Bay Biosphere were unacknowledged but for ISS.....I point to these examples, not in criticism but to highlight need and opportunity for broader and deeper and more inclusive citizen science and engagement). There is no reference to need to employ more biologists and Life Science graduates and trainees directly and in cross cutting measures (eg as observers under EMFF etc ).....and on projects abroad as part of ODA. Too often NPWS and other agencies lose connection with the mothership of BioD....IBI !!</p> <p>This submission may seem harsh but this is where BAP can be at it's best and potentially most creative and constructive; highlighting after successive report and review and all this time and analysis that only 4 L,A,s have BioD officers and 6, BioD Plans. Public funds going to BioD/Env projects must be subject to claw back and penalty if fail to deliver,,,,,till such is the case and polluters pay etc., the BAP is but at best an aspiration, at worst a dangerous greenwash accelerate=ing the BioD loss of Anthropocene Extinction, underway !!</p> <p>The BAP needs oversight and fully resourced and effective and independent monitoring group and this is far from case in this Draft BAP. Till this challenge is faced and addressed our fate and that of all Life may become just footnote of Anthropocene extinction</p>
	<p>Further to a conversation with XXXXXXXX this afternoon I am contacting you on behalf of Mountaineering Ireland to ask if it would be possible to have an extension on the deadline of 20th January for responses to the current public consultation on the National Biodiversity Action Plan. We only became aware of the consultation within the last few days.</p>

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	<p>Mountaineering Ireland has a keen interest in the sustainable management of Ireland's upland areas and it is from that perspective that we wish to make a response to the draft action plan, however due to other commitments we would not be able to do until close of business on the 26th or 27th of January.</p>
	<p>We look forward to your response.</p>
	<p>"National Biodiversity Action Plan 2017-2021: Forest Friends Ireland's submission (3pge.)</p> <p>Forest Friends Ireland welcomes the document entitled "National Biodiversity Action Plan 2017-2021, which goes under the above title and notes its contents which have a bearing on forestry biodiversity. While we find it useful as a referencing document which could lead to a comprehensive scoping report, we do not see it in its present form as a plan in the case of the biodiversity of Forestry in Ireland. However there are certain parameters which together with others not identified within which a plan could evolve. We find that the document is unnecessarily repetitive, utilising at times excessive jargon and tends to be aspirational rather than task based. With regard to Forestry a biodiversity plan should set out a number of possible approaches optimising biodiversity and should address all the parameter, however briefly, or in summary, including the following. Our submission identifies issues which we feel a biodiversity plan should deal with comprehensively:</p>
	<p>1. Analysis of the present forestry in terms of its biodiversity value. The document places more value we feel on economic rather than biodiversity/ecological desired outcomes.</p>
	<p>2. The existing forestry is mainly monoculture based which is opposite to the concept of biodiversity.</p>
	<p>3. Based in the main on one non native exotic conifer, the Sitka Spruce and other conifers the outcomes are acidic seriously affecting in many areas the spawning grounds in rivers and the fishing industry.</p>
	<p>4. Being plantation forestry based mainly on monoculture and alien single species which have been imported into the country without the supporting wildlife and predation associated with the species in their natural native habitats, they are susceptible to attack mainly from the pine weevil. Because of the lack of natural systems of predation dangerous pesticides are used which are carcinogenic, persistent and damage immune systems.</p>

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	<p>5. We feel that a hundred year biodiversity plan for forestry should be set out which would provide for the move from the present system to one based in the main on our native hardwood trees which provide for the maximum amount of biodiversity. This could be achieved over such a period. This would provide for a paradigm with provision for a continuous canopy approach, with Sylva culture and permaculture principles stitched into the plan all of which would be most beneficial in promoting biodiversity.</p>
	<p>6. Present practices of clear felling should be addressed which result in serious losses of biodiversity.</p>
	<p>7. It is a fact which should be a key determining factor in devising a plan that our native hardwood trees provide for maximum biodiversity.</p>
	<p>8. The advocacy of agro-forestry should be more strongly emphasised in a forestry biodiversity plan and in the context agro-forestry/horticulture's potential to help the move towards food sovereignty.</p>
	<p>9. Trees/forestry as sources of food not only for wildlife but also for the human population should be a considerable part of a national biodiversity plan. 10. It should be stated that the density of existing plantation conifer forestry does not permit sufficient light to reach the forest floor resulting in a dearth of ground flora.</p>
	<p>11. Examples of best practice should be included in the plan. The state of Vermont in New England which we have visited would we feel be a great model to follow. Also the ancient lowland forest of Poland (which to date has been largely intact but recently is coming under pressure) also deserves attention in making comparisons and promoting biodiversity</p>
	<p>12. It has been shown in studies that small holdings tend to support more biodiversity and arguably more ecologically sustainable than large holdings. Consequently different scales of operation and a variety of paradigms should be discussed in the plan. If that policy document were to be truly effective there would be a section promoting the return to mixed farming even if that were to be on a small scale trial basis. It would also include promotion of mixed meadow planting and option of Biodiversity promoting farm practices including harvesting and non chemical pest control such as the use of barn cats to control the mouse and rat population.</p>
	<p>13. The city forest should be addressed and in terms of biodiversity areas deprived sociologically are also deficient in tree biodiversity and biodiversity in general.</p>

Page	Comment
	<p>14. The community as stakeholders should be more prominent in developing the plan which does not appear to be the case. The plan should optimise the role of communities as stakeholder.</p> <p>15. The percentage of tree cover of itself is not an adequate measure of progress in forestry.</p> <p>16. The development of cooperatives should be an important emphasis in the plan and best practice in that regard should be outlined and described.</p> <p>17. Forest Friends are of the view that a clear roadmap should be set out based on the biodiversity principles of the Earth Conference held in Rio de Janeiro in 1992, which we believe would entail a move away from monoculture plantation forestry to one based on our native hardwood trees mainly. In any case a number of scenarios should be outlined and weighted on the basis of biodiversity principles which would result in identifying the optimum solution in biodiversity terms. Economic and social equity principles could be integrated in the weighting process for the best outcome in a fully comprehensive paradigm.</p>
	<p>18. Forest Friends strongly maintain that a plan for forestry cannot be complete without an assessment of the role which hemp could play. Hemp has been described as a miracle plant with perhaps more diverse uses than any other with potential in the spheres of food, medicine, construction, paper, bio fuel source, clothes, etc. Cropping is most frequent and its utilisation would reduce the necessity of felling large tracts of forest.</p>
	<p>Finally Forest Friends Ireland hereby submits the following which are relevant to this consultation process with regard to the National Biodiversity Plan 2017-2021. It is with regard to the Peace Forest Ireland Project which Forest Friends have been pioneering whereby peace tree plantings have taken place in all the border counties between 2014 and 2016. An intrinsic part of the project is the creation of for Forest Biodiversity. During the present planting season 4,000 peace trees will be planted in memory of all those who lost their lives in the Northern Ireland conflict. 2,000 of these will be planted in the Irish Republic sponsored by Coillte and 2,000 will be planted in Northern Ireland sponsored by the Woodland Trust Northern Ireland. These peace trees will be planted in or around National Tree Week March 5-12 2017.</p>
	<p>The Peace Forest Ireland Project involves the creation of a peace forest stretching all along the border counties north and south Ireland. It involves bringing communities together to better understand the cultural diversity and biodiversity of the various communities.</p>

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	<p>The project also envisages the creation of a Centre of Forest Biodiversity, based on best practice in Horticulture Silva culture and Permaculture; a centre for environmental education, incorporating visitor centre, existing natural woodlands, new tree planting, using 100% native species, commemorative trees, woodcrafts, maximising community involvement; Ogham groves based on the Celtic tree alphabet; tree nursery. The centre envisaged will be held in trust in perpetuity for community benefit.</p>
	<p>This Woodland Cross-border Peace Project with Northern Ireland and Republic of Ireland will promote forest skills, a culture of trees and forests, capacity building and community development. The project is not designed to interfere with the structures and practice of farming as existing but to be complementary to them. It is intended to enhance rather than damage local landscapes.</p>
	<p>To assist the design of the project and its planning the elements incorporated in the Auroville Peace Centre in Tamil Nadu India will be examined. The 2016 module of the Peace Forest Project involves the planting of 4,000 commemorative peace trees in memory of all those who lost their lives in the Northern Ireland conflict- This will be done by a process of liaising with all groups in the border counties in order to involve them in the project.</p>
	<p>To assist the process of planning and development of this module of the peace forest, advertising will be placed in the local newspapers in each Border County explaining what are envisaged and inviting ideas, and promoting involvement and support. Partnerships will be encouraged to assist all aspects and stages of the peace forest project and to assist in the sourcing of suitable sites".</p>
	<p>This is the 3rd National BioDiversity Action plan but while some steps have been taken in terms of work by such bodies as the National Parks &amp; Wildlife Services and Birdwatch Ireland, the message about the importance of bio-diversity to all of us is not getting through. This is where communities bodies in the shape of local authorities and primary schools is critical. REcent experience has shown that unless legislation is preceeded by information and education as to why action is necessary the general public can be reluctant to comply with change</p>
	<p>It is imperative to firstly roll out a program of information as to the imporatance of biodiversity to all of us. I submit the following proposal under the followig pointers</p>

Page	Comment
	<p>LOCAL AUTHORITIES: 1. Roadside hedgerows, ditches and verges are the last remaining habitat for many of our flora &amp; fauna. These are already under threat. Cutting of grass verges by mechanical means should be limited to 1 X annum &amp; stopped after August. Where some wild flowers of the Cow parsley family may need to be cut in May this should be limited to bends and crossroads for road safety reasons. 2. Benefit of bees and other insects to biodiversity and ecosystems. Cutting of grass verges by mechanical means, up against/under hedgerows endangers the habitat of these insects which continue to feed off hedge ivy well into autumn. Importance of pollination. 3. Spraying of chemicals should be addressed. Also danger to humans as part of biodiversity. 4. Importance of trees in roadside hedgerow: photosynthesis and drainage. Cutting of ivy by mechanical means can damage trunk.</p>
	<p>Primary Schools- Teach the child &amp; you teach the family: 1. Identification of garden birds, their habitats and feeding habits. Identification of most common wild flowers &amp; their habitat. 2. 'Nature Table' no longer viable. 3. Short T.V cartoons can provide information with captions e.g. 'Bee Aware', 'Bee involved'</p>
	<p>Dear Biodiversity plan unit</p> <p>please accept this late submission of comments to the NBP consultation. It is a submission i am making in a personal capacity and i was unfortunately unable to complete it and submit it any sooner. I do hope that it will be considered in the constructive manner that it has been compiled and as such that it will be included alongside the rest of the submissions and treated with the same status.</p> <p>with thanks and kind regards</p>

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	<p>You can have all the targets and plans in the world but without actually addressing what is happening on the ground right now it is difficult to see how biodiversity loss will be halted. Agricultural practices allow for widespread destructive activities in particular drainage of remaining wetlands, felling of huge numbers of deciduous native hedgerows and trees, removal of areas of native woodlands, removal of scrub, weed killing field edges, roadside verges and walls, burning and over razing of the uplands , afforestation , including on deep peat soils, with mainly non-native species managed under high impact silvicultural systems, unregulated peat extraction and intensive aquaculture with no assessment of cumulative impact or the carrying capacity of bays and estuaries. If biodiversity loss is to be halted these activities need to be brought under strict control with effective monitoring and enforcement. Exercises such as this will be entirely ineffective without addressing what is actually happening across Ireland.</p>



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	<div data-bbox="203 1265 362 1303">Background:</div>

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	Irish Islands Marine Resource Organisation (IIMRO) is a member based organisation representing islanders across all of the offshore islands of Ireland, in counties Donegal, Mayo, Galway and Cork. IIMRO is a member of the Low Impact Fishers of Europe (LIFE). <a href="http://lifeplatform.eu">http://lifeplatform.eu</a>
	The UN-initiated Convention on Biological Diversity (CBD) recognizes that humans and nature in an ecosystem are interconnected:
	“The ecosystem approach is a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way.... An ecosystem approach.... recognizes that humans, with their cultural diversity, are an integral component of many ecosystems.” Fifth Conference of the Parties to the Convention on Biological Diversity, 2000. P103-104. (Dúchas na Mara. Mackinnion, Brennan & Hurrell. ISBN 978-0-9529089-8-2. P37)
	This approach is often missing from official and state decision making processes maintaining Good Environmental Status (GES) requires the intangible cultural heritage of communities to be articulated and acknowledged. Social, as well as environmental and economic factors must be central to the new biodiversity plan and it is essential that island specific measures are written into all programmes, in consultation with island stakeholders.
	Common Fisheries Policy
	The updated Common Fisheries Policy recognises the special challenges faced by offshore islands in relation to fisheries and indicates that supports should be put in place in order that they are able to survive and prosper:
	"Small offshore islands which are dependent on fishing should, where appropriate, be especially recognised and supported in order to enable them to survive and prosper."
	(REGULATION (EU) No 1380/2013 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 December 2013 on the Common Fisheries Policy.)Oireachtas Joint Sub-Committee on Fisheries
	In addition, the Oireachtas Joint Sub-Committee on Fisheries produced a detailed report entitled Promoting Sustainable Rural Coastal and Island Communities, No. JsCF 001 in January 2014. The report lists 29 recommendations across a range of sectors which will assist in the continued survival of coastal communities, which depend on our marine resources, and their stewardship of the marine environment.
	Marine Protected Areas

Page	Comment
	<p>The creation of new locally led and managed Marine Protected Area Networks to new areas around the offshore islands to be investigated in conjunction with island communities and relevant agencies as per recommendations 10 and 14 of the Joint Oireachtas Sub- Committee on Fisheries report:</p>
	<p>Recommendation 10 (p.93): The sub-Committee recommends that the Government examines the feasibility of the issuance of heritage licences' to rural coastal and island communities. Such licences would, optimally facilitate traditional fishing practices in conjunction with the establishment of a producer organisation representing vessels under a certain LOA (Length Over All) in designated areas.</p>
	<p>Recommendation 14 (p.111): In light of the recent revisions to the regulations of the Common Fisheries Policy (CFP), the sub-Committee recommends that consideration should be given to exclusive access to vessels under 10 metres LOA within the national 12 mile limit, with the expectation that such a LOA restriction would then apply to all EU vessels.</p>
	<p>Any further designation of marine protected areas must have locally led management structures at their heart. IIMRO are proposing managed areas around the islands within the six-mile territorial water limit to allow the establishment of sustainable inshore fisheries management areas. Irish waters within the baseline to be restricted to inshore low-impact fishing only. Close cooperation between fishers, fishery managers, academics and agencies along with the use of new technologies will be essential for success.</p>
	<p>Integrated Coastal Zone Management, MPA's and People</p>
	<p>Islands are good examples of small, nearly closed systems, where the interactions between community, the environment and the economy can be more easily monitored and measured. Policy can be more simply changed and adapted at this smaller scale and successes scaled up to other areas if warranted. Integrated Coastal Zone Management measures should be incorporated into the running of any new marine protected areas to include the people that are living near, and making a living from, the sea in the area.</p>
	<p>The Scottish Governments Marine Plan suggests a vision for the marine environment which provides: "a clean, healthy, safe, productive and biologically diverse marine and coastal environment, which contributes to social, cultural, and economic well-being and which is managed to meet the long-term needs of nature and people". (Marine Scotland: Report on Social and Economic Objectives for a Scottish Marine Plan. P86  <a href="http://www.scotland.gov.uk/Publications/2010/03/30180908/0">http://www.scotland.gov.uk/Publications/2010/03/30180908/0</a> )</p>

Page	Comment
	Stewardship
	Islanders should be formally recognised as the stewards of the marine environment surrounding their islands, be involved in the collection of scientific data and their expertise incorporated into management plans along with scientific advice. Legislation should take cognisance of the strong dependence of island communities on the waters surrounding them when conflicting pressures from different sectors are being considered. Vulnerable island communities should be at the forefront in any decision making processes.
	Agencies
	Streamlining of the processes required to maintain Good Environmental Status (GES) will require the amalgamation of responsible agencies as per recommendation 2 of the Oireachtas Joint Sub-Committee on Fisheries:
	Recommendation 2 (p.37): Notwithstanding the statement in Harnessing Our Ocean Wealth, the sub-Committee considers that the current governance arrangements are not the “best working model” and that one Government Department or Agency should have more marine-related activities brought under its aegis perhaps based on the Scottish model. Community, grassroots, member-based organisations such as IIMRO be recognised as official stakeholders in the development of inshore fishery policy at a national, as they are at an EU level.
	Irish Islands Marine Resource Organisation (IIMRO).
	Árainn Mhór Island
	Co. Donegal
	I agree with your overview. eNGOs are not included enough. For example
	the Woodlands of Ireland are seen as more relevant partners then the
	multiple eNGOs working in the area of native woodland conservtion.
	There is no real desire within the plan to meaningfully embrace
	grassroots conservtion, community engagement and empowerment. The
	Locally Led Agri-Environmental Schemes are positive but are limited in
	their reach and obviously are not relevant to the majority of society
	who aren't active farmers.
	A few things that people might mention in their own submission if you can.
	The actions relating to the Heritage Bill and weakening Section 40 of
	the Wildlife Act is not consistent with the objectives of the plan and
	will undermine a while range of actions.

Page	Comment
	<p>The NHAs have been wiped off the agenda. There is not a single action or target for pNHA/NHA in the whole 84 page document. They were featured in the last plan and were featured in the previous draft shown to the Biodiversity Forum.</p> <p>The Threat Response Plan mechanism (which is a great tool to trigger action on species and habitats which need immediate conservation action) was mentioned in the draft but as far as I can see has also been removed.</p> <p>There should be more actions relating to the outcomes of the fitness check.</p>
	<p>This submission is made on behalf of the Biodiversity Officers in Dublin City Council, Kerry County Council, Fingal County Council and the biodiversity project manager for Galway County Council.</p> <p>The number of biodiversity officers in Local Authorities has changed little over the last 10 years. Currently, Fingal County Council has two permanent biodiversity officers, Kerry County Council has one permanent biodiversity officer, while Dun Laoghaire Rathdown County Council is about to appoint a biodiversity officer in a permanent position. Dublin City has a biodiversity officer on a temporary contract and a permanent biodiversity facilitator that undertakes outreach and awareness activities. In Galway, a biodiversity project manager role is facilitated by NUI Galway and funded by Galway County Council and the Heritage Council. This role is renewed on an annual basis. The focus of the work of the biodiversity officer varies per county and covers planning, raising awareness and practical conservation at local level. 19 actions in this draft national biodiversity plan have a bearing on the work that is undertaken by biodiversity officers and will have to be considered in the drafting and updating of Local Biodiversity Plans.</p>

Page	Comment
	<p>The plan (page 11) states that Government Departments and state agencies will undertake the majority of the actions in this plan, but that greater engagement with the industry and civil society will be necessary. We suggest that much more engagement is also required between DAH and other government departments and state agencies. The preparation of this plan is a prime example. A major weakness of this plan is the poor level of meaningful engagement with key personnel in Local Authorities such as Biodiversity Officers and Heritage Officers. They are expected to deliver or be involved in 19 of the actions set out in this national plan, but DAH did not check whether the Local Authorities have the capacity to deliver these actions and what the priorities are for the Local Authorities themselves in terms of nature conservation. It is our view that Local Authorities should have been engaged with at the start of preparation of this plan and not when the plan is a draft stage. Doing a 5 week public consultation over the Christmas and New Year period is not in line with best consultation practice either. We would argue that more time should be spend on engaging with the relevant stakeholders that are expected to implement these actions even if it that means delaying the final plan. There would be a lot of support to be gained from this in the long term which would benefit the level of implementation of the actions.</p>
	General comments on national biodiversity plan
	More habitat and species related actions and targets required
	<p>Under Ireland's response to Biodiversity loss, the key achievements listed are linked to setting up working groups, forums, data centre and producing plans and reports. All of these are administrative &amp; academic achievements that will help to establish a way forward and improve communication with various partners. However, which of these actions resulted in the halt of biodiversity loss? It is recommended that an indication be given of which habitats and species improved during this 2nd plan period as a result of the implementation of this plan to show how the 2nd national plan contributed to real enhancement and protection of biodiversity. This could focus on particular on species and habitats of which the conservation status is bad or inadequate.</p>

Page	Comment
	<p>Reports and working groups will not necessary lead to a better conservation status of habitats and species. Most of the targets in this third plan also relate to administrative and academic targets, with very few real conservation targets for species and habitats. It is recommended that much more focussed biodiversity targets for species and habitats be included in this plan, particularly for those Annex I habitats and species with a bad conservation status to ensure that work is undertaken to reverse this status. This will allow Local Biodiversity Plans to target particular habitats and species in their administrative area.</p>
	<p>To include an action for a long term vision of nature conservation in Ireland</p> <p>It is recommended that an action be included in the NBAP to that aims to develop a long term vision and strategy on what biodiversity conservation and the relation between society and nature should look like in Ireland by 2030 and 2050. Such a long term vision would include elements such as conservation status of habitats and nature conservation areas, population sizes of key species, community engagement in nature conservation areas, access to nature for all ages, awareness raising, legislation, research programs, staffing requirements NPWS and partner agencies etc. Each National Biodiversity Plan can be prepared against a long term approach and implement more of the long term vision as each national plan is implemented. In the current plan there seems to be no overall vision and strategy where Ireland wishes to be and this has resulted in a list of sometimes rather random actions without any clear indication why these actions are required or how these are going to stop the loss and decline of habitats and species.</p>
	<p>Development pressure on biodiversity not considered in plan</p> <p>Under pressures on Ireland Biodiversity and ecosystem services no reference is made to housing, industrial and infrastructural developments. This is another major driver of habitat loss in this country yet no mention is made of this. It is recommended that development and its impacts are included in this paragraph.</p>
	<p>Regarding the overall lay out of the actions it is strongly recommended that the baseline text be removed. This section is so incomplete for most actions, that we recommend that it is better left out. Instead it is recommended that an indication is given how this action is to be achieved.</p>

Page	Comment
	<p>I wish to emphasise my points that I put into the questionnaire. It did not allow you to write in several lines, so it was hard to make longer statements. Here is my narrative response to the biodiversity consultation. I trust this is in order (please see my PS below).</p>
	<p>Biodiversity</p>
	<p>The world is experiencing its greatest loss of biodiversity in the history of mankind. We have lost over 50% of our animals, birds and fish since 1970 (WWF report Dec. 2014). This loss is so great that it is being considered the 6th. extinction in the history of the earth and has been given a name – the Anthropocene. This is due to its being essentially caused by human activity. The main human causes are:</p>
	<ul style="list-style-type: none"> <li>• Human population growth: world population has increased from just over a billion in 1900 to nearly 7.5 billion today. This is leading to massive habitat loss as space is found for more humans to live.</li> </ul>
	<ul style="list-style-type: none"> <li>• Animal agriculture: this has a huge displacement effect on wildlife (and plant life) as so much land is needed to rear animals (mainly cattle) to feed humans. Animal agriculture takes up one-third of the land on earth (Meet Free Monday website).</li> </ul>
	<ul style="list-style-type: none"> <li>• Increased consumption: humans are using more resources per person than previous generations to live their daily lives, and this is impacting on animal life. Buying “stuff” that is not essential to our lives is consuming precious earth resources – and depriving key wild life needs as a result.</li> </ul>
	<ul style="list-style-type: none"> <li>• Climate change: this is increasing in its impact on birds and animals to feed their young. Increased acidification of the seas &amp; oceans will seriously curtail fish life in the future, if climate change is not addressed.</li> </ul>
	<p>As a society, we need to take urgent action to turn this situation around. A world without many species would be a very poor place indeed and would deprive us of vital eco-system services. A whole series of measures is needed, including the following:</p>
	<ul style="list-style-type: none"> <li>• A need to limit population growth by encouraging families to have fewer or no children. This can be done by reducing or eliminating childrens’ allowances and changing the tax code to minimise tax benefits of children. This is quite controversial and may not attract support.</li> </ul>
	<ul style="list-style-type: none"> <li>• Moving society from an ever-increasing meat-eating one to one much more based on vegetarianism and veganism.</li> </ul>



Page	Comment
	<ul style="list-style-type: none"> <li>· Reduce consumption pressures with increased taxation on non-essential goods and services. We need to move governments away from considering economic growth as the be-all and end-all, whereby increased purchase of “stuff” is considered a barometer of success.</li> </ul>
	<ul style="list-style-type: none"> <li>· We need to tackle climate change urgently on many fronts. However, there does not appear to be a political will (especially in Ireland) to address this. As each month of inactivity passes, the job becomes much more difficult as the cumulative carbon budget increases relentlessly.</li> </ul>
	Hedgerows:
	<p>These are a important part of our natural environment and heritage from times past. There is a great need for hedgerows given the virtual elimination of woods and forests up to 1800. Ireland is one of the least forested countries in Europe with about 10.5% of its area under forest cover. Of this the majority is made up of forestry plantations. These monoculture blocks of conifers account for 72.8% of the national forest estate. While trees like Sitka spruce support biodiversity in their native distribution along the North-western seaboard of North America they support relatively low levels of biodiversity in Ireland. Only around 2% of the country is covered by what is termed native or semi-natural woodland, and much of this is highly fragmented and modified. Many of our hedgerows are hundreds of years old and are made up of native trees and shrubs. Hedgerows are estimated to cover 3.9% of the Irish landscape. They are therefore an extremely important reservoir for woodland plants and animals. These linear strips of native woodland, also act as linking corridors between habitat patches. Ireland’s hedgerows are some of the most important habitats in Irelands agriculturally dominated landscape. Management intensity is one of the greatest threats to hedgerow biodiversity.</p>
	<p>In medieval and early-modern times, trees were cut down to build homes, furniture and ships. They contain many species of trees, bushes, and other plant life. Without them many of these could disappear from the Irish landscape. They form vital arteries for birds, animals &amp; insects to move, feed, colonise and bring up young secure from predators. They help create a food chain for animal life.</p>

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	<p>Hedgerows on byways and country roads are a familiar and much-loved sight in the Irish landscape. They are important for tourism and the maintenance of rural life generally. Birdwatchers, walkers and other country enthusiasts enjoy the experience of hedgerows. Our countryside would be severely diminished without them. There is strong pressure by government &amp; farmers to trim &amp; cut them down purely for short term economic gain. We must appreciate them in broader terms and for their intrinsic value to the environment and society.</p>
	<p>Policies must be pursued to safeguard hedgerows and to encourage their flourishing for generations to come. These would include:</p>
	<ul style="list-style-type: none"> <li>• The immediate cessation of Minister Humphries current attempts to increase the period of cutting and trimming during the year.</li> </ul>
	<ul style="list-style-type: none"> <li>• The Common Agriculture Policy (CAP) must be made flexible to discourage field maximisation and drainage at the expense of hedgerows.</li> </ul>
	<ul style="list-style-type: none"> <li>• Road safety measures by county councils must be made more sympathetic to conservation of hedgerows.</li> </ul>
	<ul style="list-style-type: none"> <li>• Education/appreciation of hedgerows should be undertaken, especially among young people and farmers, to inculcate an interest in these ecological assets.</li> </ul>
	<p>Monoculture:</p>
	<p>Extensive &amp; expansive agriculture is leading to huge fields of monoculture grass and cereal crops. This is very bad for biodiversity for the following reasons:</p>
	<ul style="list-style-type: none"> <li>• There is little of their normal diet for birds and small animals to eat.</li> </ul>
	<ul style="list-style-type: none"> <li>• Use of fertilizer and pest control on a large scale is hazardous to animal life.</li> </ul>
	<ul style="list-style-type: none"> <li>• No variety in plant life in the fields and no scope for plants to generate.</li> </ul>
	<ul style="list-style-type: none"> <li>• Open spaces leading to predation of small animals and birds.</li> </ul>
	<p>Large-scale fields help make country landscapes very barren and boring so people will not care for countryside. Bland and monotonous landscapes will not encourage walking and exploring. This will lead to people not caring for a barren landscape and biodiversity will suffer as a result.</p>
	<p>To address monoculture, the following must be pursued:</p>
	<ul style="list-style-type: none"> <li>• More organic agriculture.</li> </ul>
	<ul style="list-style-type: none"> <li>• Smaller farms and fields operated by farmers, with care of wildlife mixed in. CAP financing to boost moves in this direction.</li> </ul>

Page	Comment
	<ul style="list-style-type: none"> <li>· County council grants to break up field size and encourage diversity in growing of crops etc.</li> <li>· Leaving margins around fields for wild plants and grasses to grow.</li> </ul>
	Meadows
	Wild flower meadows are becoming scarcer in the Irish landscape. Naturally occurring grassland allowing wild flowers to grow and flourish is important for biodiversity. Again, the need to maximise farming income is forcing farmers to leave no fields (or part of fields) without a dominant grass type or few crop varieties. Leaving fields fallow is not followed much in modern farming, with fertilizer use maintaining fields in production every year.
	There is a need for farmers to not see every acre in money terms. They should enjoy meadows in themselves. Wild flower meadows are lovely for walking in, helping to foster appreciation of the countryside by city slickers.
	Solutions to encourage meadows are similar to monoculture. We need to boost organic farming, encourage farmers to mix up their farming in smaller fields and to leave space for wildlife. A move from animal to vegetarian farming would facilitate the reduction of monoculture grassland, and enable more natural meadows among different crop plots.
	Peatlands
	There is an urgent need to reduce destruction of remaining peatlands in Ireland, and their unique biodiversity. We have less than 30% of peatlands that existed in 1900 (including less than 1% of active raised bogs). We are in danger of going the way of the Netherlands, who have lost all their bogs in recent times. Peat is an important carbon sink in the fight against climate change. Therefore we need to stop peat burning in power stations, and low-scale saving of turf in the countryside. Peat is a bigger carbon emitter than coal in producing electricity, so is totally unsustainable.
	Exploitation of peatlands for fuel has been under way in Ireland for 400 years. Today traditional turf cutting, mechanical turf cutting and industrial peat extraction have accounted for a staggering loss of 47% of the original area of peatlands in Ireland. This represents over half a million hectares of land. It concerns two peatland types in particular – raised bogs and blanket bogs.
	Our bogs are great for biodiversity as a marshy area. Many species are much happier in bogs than other terrain. Some are unique to this habitat and would go extinct without it. They are very popular on country walks. Again this fosters tourism and care for our natural environment.

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	<p>There are some things to bear in mind in relation to policy on peatlands. We need to watch tree planting in upland bogs which is bad for hen harriers and other wildlife. Wind farms on sensitive bogland could lead to landslides and also impact on wildlife.</p> <p>Agriculture shift: meat to plants.</p> <p>Agricultural intensification of Ireland's traditional beef and dairy sectors has been detrimental for biodiversity – there is a huge need for space, fertilizers, water etc. Reduced need for the massive space required to stock cattle can be used to foster biodiversity. Meat production is also very bad for climate change – we need to reduce the national herd. Lobbyists arguing for increased efficiency in animal agriculture have no validity if absolute emissions increase as a result.</p> <p>It has been clearly determined that more food calories are produced per acre with plants/cereals/crops/trees than cattle/sheep – it is a much better use of good land. Conversion of edible foodstuffs into fodder for livestock leads to an overall loss of nutrition. It is much more effective for humans to eat the grains than to eat meat or dairy products which are derived from livestock. A vegetarian diet can be produced in a biodiversity-rich environment, as mentioned earlier in this policy paper.</p> <p>Poultry and pork are better for climate change than cattle and sheep, but animal welfare issues arise here, as has been well documented. Therefore meat consumption of any sort should be reduced. It is better for biodiversity, climate change and animal life on the earth.</p>
	<p>The IFNC welcomes the inclusion of several points related to natural capital in the draft plan, including some of the points proposed by XXXXXXXXX on our behalf last May. However, we are concerned that there is no substantial advance on the actions proposed in the previous National Biodiversity Plan:</p> <p></p> <p>1.12 Develop and use the means to integrate the economic value of biodiversity and ecosystems into national accounts, national and local development strategies and planning processes.</p> <p></p> <p>3.9 Carry out further and more detailed research on the economic value of ecosystems and biodiversity in Ireland.</p> <p></p>

Page	Comment
	<p>In their active and very helpful support for the establishment and work of the IFNC, the NPWS (and the EPA) have contributed significantly to delivering on these actions. Now, however, we believe we need to move to the next stage, the development of a Natural Capital Asset Register and implementation of NCA accounting at national, local and planning levels, and within the regulation of the private sector.</p>
	<p>Scotland has developed a Natural Capital Asset Index and made it an indicator of national performance, and has also enshrined natural capital in its economic strategy. In its recent Programme for Government, Northern Ireland committed to establishing a similar Natural Capital Asset Index. Speaking at the IFNC conference 'Make Nature Count' in 2016, both Gary Gillespie (Chief Economic Adviser to the Scottish Government) and Dieter Helm (Chair of the UK's Natural Capital Committee) emphasised the need for a natural capital assets register in order to identify natural capital risks and inform the allocation of resources for natural capital maintenance and restoration.</p>
	<p>Given the above, we propose the following:</p>
	<p>About Community Wetlands Forum</p>
	<p>The Community Wetlands Forum (CWF) was established under the umbrella of Irish Rural Link in September 2013. The initiative came from community groups already involved in wetland conservation and also in recognition of the work already undertaken by Irish Rural Link on behalf of community groups affected by the Habitats Directive (92/43/EEC) and in the development of wetlands as an asset for the community. Since its inception, the CWF has held a number of meetings and visits to member sites. In April 2016 the Forum agreed a constitution.</p>
	<p>The main aim of the CWF is to provide a representative platform for community-led wetland conservation groups based on the principles of community development (empowerment; participation; inclusion, equality of opportunity and anti-discrimination; self-determination; partnership). In support of the main objective, CWF has the following subsidiary objectives:</p>
	<ul style="list-style-type: none"> <li>• To promote Wetlands and Peatlands as important places of biodiversity and conservation, as well as community integration, well-being and ownership</li> </ul>
	<ul style="list-style-type: none"> <li>• To facilitate the sharing of knowledge, ideas and organisational methods; research and best practice; knowledge from national and international experts; and funding possibilities</li> </ul>

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	<ul style="list-style-type: none"> <li>• To grow the network by encouraging and inviting new community groups who are in the process of developing community wetlands or who wish to undertake such developments</li> <li>• To facilitate a regular Community Wetlands Forum where all stakeholders in wetland conservation can participate as equal partners</li> <li>• To share and introduce the latest research, national and international expertise, similar networks, funding possibilities and approaches in conservation best practises</li> </ul> <p>Community Wetland Forum Comments for Consideration:</p> <p>The following recommendations are suggested by the forum for consideration into the published version of the National Biodiversity Action Plan 2017-2021.</p> <ul style="list-style-type: none"> <li>• The CWF welcome that it is mentioned in the document. It is mentioned as 'Wetlands Forum'. This should be 'Community Wetlands Forum'.</li> </ul>
	<p>To whom it may concern,</p> <p>The Irish Ecological Association was founded in 2015 as a learned society for ecologists working in Ireland (Northern Ireland and the Republic of Ireland) and/or with an interest in Irish ecosystems</p> <p>We are writing on behalf of the Irish Ecological Association in response to the draft National Biodiversity Action Plan (NBP) 2017-2021 (hereafter 'the draft Plan').</p> <p>This document has been compiled from the responses of the undersigned members of the Irish Ecological Association.</p> <p>The Association welcomes the overall approach in the draft Plan, and commend the quality of the draft Plan for the attention to detail, and recognition of the economic benefits of environmental protection. Members of the Association highlight a number of specific areas of the draft plan we consider could be improved. References cited throughout are detailed at the end of this document.</p> <p>Yours sincerely,</p>
	<p>General Comments</p> <p>1.1 Performance Indicators Comment 1 A key concern of some IEA members is the use of Performance Indicators (hereafter</p>

Page	Comment
	<p>'PI's'). This contrasts with the quantifiable targets (e.g. % projects completion, € million spent) used in</p> <p>other departmental strategy documents such as the framework for improved health and wellbeing 2013-2025' published by the Irish Department of health (Department of Health, 2013).</p> <p>If the draft Plan must adopt PI's in lieu of targets, PI's must at the very least be specific,</p> <p>comprehensive and measurable. In a large number of instances, PI's in the draft Plan are absent or where present vague, or inadequate.</p> <p>Three specific issues which recur are highlighted here.</p> <p>The use of an absolute metric such as number should be replaced by a proportion (e.g. %)</p> <p>PI's should, where relevant relate to meaningful sub-groups to inform analysis of particular trends (e.g. % of marine vs. terrestrial designated areas which have been mapped; Action 2..1.18)</p> <p>PI's should avoid using qualitative language for which success or failure cannot be measured (e.g. how does one determine if consideration of biodiversity in Local Authority Development Plans has been "explicit" under Target 1.1.4? This language should be amended to provide a measurable PI.</p> <p>Comment 2: In some cases no performance indicator is given and it is likely that this is because the objective relates to what is written in another strategy document. Ideally, it should be stated when this</p> <p>is the case as it is for Target 4.2.2.:(contd below). However, frequently this is omitted and it is unclear whether there are no performance indicators or</p> <p>whether the performance indicators/targets are within another strategy. Hence it would be better to</p> <p>state this clearly as in the example above.</p> <p>Below is an example where the indicators are almost certainly in the associated document but not stated in the performance indicators (SEE COMMENT)</p>
	1.2 Adequacy of Baseline

Page	Comment
	There is a need to thoroughly review the baseline and correct it in accordance with the comments below.
	Comment 1: The Association is concerned that the 'baseline' provided for each target –with rare exceptions–, presents only 'positive' data skewed towards evidence of plan progress.
	A more objective evidence-based baseline should be provided to include 'negative' evidence indicating
	gaps or missed targets'. Of direct relevance to species conservation is the skewed baseline presented
	for certain species under significant threat such as hen harrier.
	Error! Reference source not found.
	42858
	Under Target 3.1.1 relating to enhancement of biodiversity appreciation amongst policy makers, there
	is no indication that policy to date could be failing to protect Hen Harrier. The Association would bring
	to the Departments attention the extensive data in the Irish Raptor Study Group's Position Statement
	recently submitted to the chair of the Hen Harrier Threat Response Plan (IRSG, 2016). Although the IRSG welcome the roll out of the Locally Led Agri-Environment Schemes (LLAES), it also reports
	extensively on the apparent failings of agricultural policy to conserve Hen Harrier populations within Special Protection Areas (SPAs).
	For instance, the Association would draw the Departments attention to the following selection (from an
	extensive review) of stark facts reported in the position statement:
	· There are no Conservation Objectives for Hen Harrier SPAs in Ireland, indicating a failure to comply with the EU Habitats Directive 92/43/EEC,
	· Only €95 million of the €528 million allocated to Natura 2000 sites in Ireland was used for



Page	Comment
	that purpose during the last Rural Development Plan (2007-2013)
	A different instance of potentially biased reporting would be the baseline for Target 1.1.12. To our knowledge, the Irish State has failed to transpose the Non-Financial Reporting Directive by the December 2016 deadline required under the Directive. The baseline is silent on this.
	Comment 2: There are numerous instances where the baseline does not provide data on the current status of the proposed PI. For instance, Target 1.1.1 relates to movement of authorities towards a ‘no net loss’ strategy position.  The proposed PI is “No. of Departments/Agencies articulating a no net loss target”. However, the baseline does not identify how many Departments/Agencies currently articulate this type of target. This  should be provided here and elsewhere to ensure monitoring of the success of the plan over time is possible. In other cases, such as Target 1.1.10 relating to establishment of a national Business and Biodiversity Platform, the baseline apparently includes a recommendation that “existing corporate networks could be expanded
	WRITTEN SUBMISSION OF THE IRISH RAPTOR STUDY GROUP COMMITTEE DRAFT NATIONAL BIODIVERSITY ACTION PLAN 2017 – 2021 PUBLIC CONSULTATION CONTENTS 1. EU BIODIVERSITY STRATEGY ..... 3 2. REFERENCES TO RAPTORS IN THE DRAFT NBSAP..... 3 3. REFERENCES TO RAPTOR SPECIES IN THE DRAFT NBSAP..... 3 4. SIGNIFICANT OMISSIONS FROM THE DRAFT NBSAP ..... 4 4.1. ARTICLE 39 THREAT RESPONSE PLANS ..... 4

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	4.2. NATURAL HERITAGE AREAS (NHA)..... 4
	5. RESPONSES ON SPECIFIC TARGETS..... 6
	5.1. TARGET 1.1.1..... 6
	5.2. TARGET 1.1.3..... 7
	5.3. TARGET 4.1.1 ..... 8
	5.4. TARGET 4.1.5.....11
	5.5. TARGET 6.1.3.....12
	1.EU Biodiversity Strategy to 2020: EC Communication (COM 244/2011)The EU Biodiversity Strategy aims to halt the loss of biodiversity and ecosystem services in the EU and help stop global biodiversity loss by 2020 while speeding up the EU's transition towards a resource efficient and green economy. Targets set out in the Strategy relevant to government Departments of Member States relate to the implementation of the Habitats and Birds Directives.
	2.REFERENCES TO RAPTORS IN THE DRAFT NBSAP The term “raptor” appears once in the Draft National Biodiversity Strategy & Action Plan (NBSAP):
	3.REFERENCES TO RAPTOR SPECIES IN THE DRAFT NBSAP The reference specifically to Raptor species other than those set out in Target 4.5: “Hen Harrier” appears twice and “Merlin” appears once in the Draft NBSAP: Page 10: Irelands response to biodiversity loss - “RaptorLIFE project focusing on connecting and restoring habitat for Hen Harrier, Merlin....” & Target 3.1  Enhanced appreciation of the value of biodiversity and ecosystem services amongst policy makers, stakeholder, local communities and the general public.  3.1.11 Provide support, education and training opportunities necessary to inform local communities

Page	Comment
	about important biodiversity in their area and to enable them to act as useful local monitors of environmental change.
	Performance indicator: Number of training courses.
	Baseline: Locally Led Agri-Environment Schemes (LLAES) are funded through the Rural Development Programme and currently funds biodiversity work including for Hen Harrier...”
	SIGNIFICANT OMISSIONS FROM THE DRAFT NBSAP
	4.1. ARTICLE 39 THREAT RESPONSE PLANS
	Regulation 39 of the European Commission (Birds & Natural Habitats) Regulations 2011 (SI No. 477), provides a mechanism to fulfil the objectives of the Habitats Directive or the Birds Directive, to protect designated habitats and species through the development on an appropriate Threat Response Plan to “cease, avoid, reverse, reduce, eliminate or prevent the threat, pressure, hazard, combination of threats, pressures or hazards, adverse effect, pollution, deterioration or disturbance.”
	The IRSG believe that Article 39 is a critical tool for priority conservation issues and is instrumental in implementing the inter departmental and sector level intervention required to achieve, in part, key objectives of the EU Biodiversity Strategy.
	The July draft of the NBSAP had identified the implementation of Threat Response Plans as a fundamental tool to achieve the objectives of Target 6.3 over the duration of the NBSAP. It contained Action “6.16.1 Implement species” Threat Response Plans where necessary and review and update as required”.
	The reference to the initiation and implementation of Threat Response Plans has been omitted from the current Draft NBSAP.
	It is a concern that there is no specific reference to the implementation of the pending Draft Hen Harrier Threat Response Plan in the Draft NBSAP.
	IRSG strongly recommend that NPWS reinstate the implementation of Threat Response Plans in the NBSAP:
	Implement species and habitat threat response plans where necessary and review and update as required.
	4.2 NATURAL HERITAGE AREAS (NHA)
	Ireland's Natural Heritage Area (NHA) network is the basic designation for wildlife.
	Along with our national parks and the Natura 2000 network they form the foundation of

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	<p>our network of protected sites. The protection they provide is critical to prevent the biodiversity loss and contributes to the implementation of measures concomitant to the requirements of Articles 1, 2, 3 and 10 of the Habitats Directive and Article 2 and 4 of the Birds Directive.</p> <p>In this regard, NHAs provide connectivity between other protected sites and subsequently limit further negative impacts of fragmentation and are important in providing resilience against pressures such as climate change. They are also of significant importance in the future integration of Green Infrastructure Policy objectives. Given the pivotal role that Irelands NHAs and proposed National Heritage Areas (pNHA) play in the conservation of biodiversity, the IRSG would have expected them to feature strongly in the targets of the current Draft NBSAP. The term Natural Heritage Area is only referred to twice in the current Draft NBSAP.</p>
5   Page	<p>A comparison to the July draft of the NBSAP shows this contained the following action: "6.15.1 By 2018, review policy regarding designation of Natural Heritage Areas." With a performance indicator of "Review completed" and a Baseline of "Policy in regard to pNHAs is currently under review."</p> <p>This was the only action within the previous NBSAP which related to NHAs and it has been removed from the current draft. The IRSG cannot comprehend why one of the most important tools for the protection of sites for biodiversity conservation in Ireland has been completely deleted from the current agenda by the very Department whose remit is to designate and advise on the protection of habitats and species identified for nature conservation.</p> <p>Only 148 peatland NHAs out of the 800+ NHAs identified in the 1990s have been statutorily designated and given legal protection. This is considerable failing of the Department, both administratively and legislatively. Under the previous NBSAP it was identified under target 16 that:</p> <p>"Although some NHAs have been designated, a systematic programme for NHA designation has not been undertaken and some 600 areas proposed as NHAs in the 1990s have not been protected yet by designation."</p> <p>This previous target had two associated actions:</p>

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	16.1 By 2015, review previously proposed Natural Heritage Areas and designate as appropriate under the Wildlife (Amendment) Act, 2000.
	16.2 By 2015 strengthen the coherence, connectivity and resilience (including resilience to climate change) of the protected areas network using, as appropriate tools that may include flyways, buffer zones, corridors and stepping stones.
	The performance indicators for these actions were:
	· Number and area of NHAs designated;
	· Number and area of sites that meet criteria for NHAs but are not designated; and,
	· Fragmentation index.
	It is clear that the level of protection afforded to Irelands pNHA and NHA network is not adequate.
	There must be an action within the NBSAP which commits to the full designation of a large proportion of the 600+ identified pNHAs to full NHA status. Many of our pNHAs also have SAC and/or SPA designation already so designating there is no obvious rationale for not proceeding with protecting these sites under statute.
	Because target 16 of the second NBSAP has been subsequently dropped from the current NBSAP there is no indication of why these actions were not carried out. This lack of coherence and accountability between the three NBSAPs is a major flaw.
	The IRSG request the Department to reinstate target 16 of the second NBSAP and ensure that designation process of Irelands pNHAs is progressed to completion by 2021.
	A Chara,
	Happy New Year. Please note that after consulting Mr. Stephen Ward's and Dr Sharon Parr's contribution to the Biodiversity Action Plan on behalf of the BSBI for County Clare and the Aran Islands. I wish to register my support for their contribution and in particular the following comment:



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	is contrary to the spirit of meaningful public participation and especially leaves those working in a voluntary capacity struggling to make their voice heard.
	Despite the impression that the NPWS is not engaged in a genuine attempt to consider the views of others, the IWT wishes to take part in this process in a constructive and positive manner.
	Continuing biodiversity loss
	It is welcome that the draft NBAP acknowledges the serious and on-going pressures faced by our wildlife, despite the obvious benefits that healthy nature brings to society. We also acknowledge that progress has been made in recent years, especially with regard to the knowledge base. The work of the National Biodiversity Data Centre and the generation of red data lists are making an invaluable contribution to our understanding of biodiversity.
	Elsewhere there has been significant improvements in the planning system in recent years which are delivering better protection for wildlife than had been the case. The reintroduction of white-tailed sea eagles and red kites (although sadly not the golden eagle), targeted programmes for the Natterjack toad and the Lough Boora Parklands have been broadly successful on a number of levels (to highlight some of the positive initiatives in recent years). The Burren and Aran LIFE programmes are exemplars in good conservation practice.
	However the underlying threats to biodiversity have remained unchanged since the first NBAP was produced in 2002. Indeed, some of the pressures, especially from agriculture and forestry, have intensified in the interim. We feel therefore that it is incumbent upon the state, and the authors of this draft plan, to critically analyse why we are failing to meet clearly stated goals and targets. The production of yet another plan, with broadly similar objectives and goals to those that preceded it, and with new, arbitrarily generated target dates is surely a meaningless exercise if we cannot get to the heart of why our beleaguered natural heritage continues to disappear before our eyes. The plan seems to include many worthy actions but with no realistic means of implementing them, especially where they have been present in previous plans and progress is still to be made (e.g. review of the Wildlife Act). We would suggest that given the challenges that exist, a much smaller plan,

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	which is targeted and realistic, would stand a better chance of success than yet another wish list.
	Lack of political will
	The IWT suggests that it is a fundamental lack of political will which hampers progress, a feckless disinterest among politicians who routinely see our natural environment as little better than wallpaper or the backdrop to a photo opportunity. The case has yet to be made at a senior level that the declining fortunes of our wildlife coincides with the decline in rural and coastal communities and is leading to the degradation of the Irish landscape and environment, no doubt our most important assets. A case in point is the Hen Harrier, where ample data on the bird's status and ecology, and the availability of substantial funding from the Rural Development Plan to help landowners in protected areas have failed to prevent drastic declines in population – something which can be squarely blamed on a lack of engagement by successive ministers for agriculture and heritage.
	As a starting point therefore, the IWT would like to see an action item, under it's own heading, as to how it is proposed to engage national politicians in the urgent need to restore species and habitats before it is too late. This could be done through seminars or one-to-one meetings with politicians. We accept that eNGOs and the general public also have a role to play in meeting this objective and the IWT is more than happy to play its part.
	Reform of the NPWS
	This campaign should be accompanied with a review of the budget for the NPWS itself – it is unrealistic to think that the important tasks of this organisation can be fulfilled on the meagre budget it currently works on. The IWT would like to see the recommendations of the Grant Thornton review ('Organisational Review of the National Parks and Wildlife Service, 2010) implemented, not only with regard to an appropriate budget and staffing levels, but in terms of the organisational structure. A single authority in charge of the NPWS is essential if there is to be leadership and a restoration of morale among staff. We know from our daily experience that the NPWS is full of highly skilled and passionate individuals, however their enthusiasm is



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	smothered by what is perceived as a lack of support and poor communication.
	This is detailed in the aforementioned Grant Thornton report.
	Because the NPWS is now within the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, we believe that its important functions cannot be fully recognised and appreciated. The NBAP should include an objective to reposition the NPWS as an independent agency reporting to the Minister for Environment. This should be similar to the Environmental Protection Agency or even within that organisation.
	Lack of targets
	The draft NBAP contains many positive actions and initiatives. However specific targets are conspicuously lacking and while ambition is welcome, previous experience shows that realism is needed. For nearly all the actions it will be impossible to evaluate whether the targets have been met or not. The timeframes included similarly seem to have been chosen at random. To give one example, action 4.1.3 (Implement the National Peatland Strategy) does not set a target (in hectares) for the 'area of bog under restoration' or 'the number of bog sites with restoration activities completed'. There is no mention of blanket bogs, a significant portion of the peatland resource, where even recently set targets in the Peatland Strategy have been missed.
	Similarly, action 1.1.12 – to identify and take measures to ensure that incentives and subsidies do not contribute to biodiversity loss, and develop positive incentive measures, where necessary, to assist the conservation of biodiversity – contains no indication as to what policies are referred to or how addressing them is to be achieved.
	For action 3.1.9 – work with farming organisations and landowners to promote wider understanding of ecologically sustainable land use and the benefit to farmers of biodiversity – the baseline is the Native Woodland Scheme, which seems bizarre. While 'key partners' have been identified, there is no performance indicator and no action to identify what exactly is being proposed.
	These are just some examples.
	Citizen science

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	<p>We could kindly ask that the IWT be included among the list of NGOs under action 2.1.9 as we have been, and continue to be, engaged in ‘citizen science’ and volunteer based surveys (e.g. for smooth newt, otters, SAC watch and currently for reptiles).</p> <p>Greenwashing</p> <p>Industry-based plans, e.g. the marketing initiative ‘Origin Green’ do not provide an indicator of the health of our wildlife and we feel it is not appropriate to include these in the NBAP, e.g. under action 1.1.11. The appropriate responsibility for actions to enhance farmland biodiversity lies within the Department of Agriculture and not An Bord Bia, its marketing wing.</p> <p>Under action 5.1.1, the Harnessing Our Ocean Wealth plan is given as a baseline for future actions. However this is an economic plan and has little relevance to marine conservation. Indeed these initiatives undermine the protection of biodiversity by ‘greenwashing’ and giving the false impression that chronic environmental problems do not exist.</p> <p>Proposed Heritage Bill</p> <p>Similarly, action 4.5.1, in relation to proposed changes to the Heritage Bill which, if implemented, will see an extension to the hedge-cutting and burning dates, is actively hostile to environmental protection and has no place in the NBAP. Indeed a suggested action might be to ensure that existing hedge cutting and burning dates are maintained. Hedgerows need better protection and maintenance and no actions for this are identified. Similarly, actions to address the annual wave of wildfires which have had such negative effects on upland areas are absent. We would like to see the NBAP recognise the harmful effects of fires in upland areas and promote schemes to help landowners find alternative means of land management in these sensitive areas.</p> <p>National Parks</p> <p>Ireland has six national parks and their importance is recognised in the NBAP. However in most of these areas there are chronic conservation issues and a lack of management. As a first step it is essential that an action be included that all national parks prepare a management plan which places biodiversity</p>

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	conservation as the number one priority.
	Natura 2000
	Although the process of fully designating Natura 2000 sites and setting conservation objectives is important (indeed long overdue), it is essential that renewed impetus is given to the development of management plans for these areas. It is only through the implementation of such plans that we can hope to reverse the declines in biodiversity in these areas.
	Natural Heritage Areas
	It is noted that the full designation of NHAs, which was an action in previous NBAPs, has been abandoned. These sites have been recognised as of national importance for biodiversity and their lack of legal designation has resulted in deterioration at many sites. Indeed the pNHA network has shrunk since the last NBAP was prepared, a signal surely that some in the Department of Arts etc. considered that once important areas no longer hold conservation value. Despite the legal hurdles, it is essential that the struggle to define a coherent network of nationally important sites not be abandoned.
	Legal protection alone is not a solution and so it is urgent that these sites be resurveyed and management plans prepared. To accompany this programme the NPWS should publish criteria for NHA status, to allow new sites to be designated.
	Local Nature Reserves
	We would like to see an action in the NBAP which gives Local Authorities the power to designate local nature reserves under their respective County Development Plans. This would provide an opportunity for local people to engage with conservation and better protect important areas which would not qualify for Natura 2000 or NHA status.
	Marine – red list, legal protection and MPAs
	The marine environment is under increasing pressure and is suffering biodiversity loss due to overfishing, habitat loss and general lack of management. To begin reversing this an action of the NBAP should be to develop a Red List of marine fish and invertebrates (notwithstanding that one for sharks and rays is forthcoming – something which is most welcome).

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	<p>The lack of legal protection for many marine species, which are known to be endangered, or of restricted distribution has possibly resulted in regional extinctions (e.g. the angel shark). A proposed list of marine species for protection under the Wildlife Act will be shortly published by the IWT and we feel this anomaly needs to be addressed as a matter of urgency.</p> <p>We very much welcome action 5.2.3 which states that no take zones, or areas where benthic disturbance is to be prohibited, is under consideration. This action should refer to the wider requirement, under the Marine Strategy Framework Directive, to designate a ‘coherent network’ of Marine Protected Areas (MPAs). An MPA differs from an SAC or an SPA in that “its primary and clearly stated objective is nature conservation<sup>1</sup>”.</p> <p>The process of producing ‘natura management plans’ for fishing and aquaculture in SAC/SPAs has been slow. For those which have completed the process, e.g. Roaring Water Bay in Cork, the measures taken are insufficient to protect the wider</p> <p><sup>1</sup> Report from the Commission to the European Parliament and the Council on the progress in establishing marine protected areas (as required by Article 21 of the Marine Strategy Framework Directive 2008/56/EC)</p> <p>ecosystems. The process of identifying MPAs must commence as a matter of urgency and must include a communication programme which involves local interests and which promotes the potential benefits of MPAs to local economies. Ample funding is available for this under the European Maritime and Fisheries Fund.</p> <p>Overfishing is perhaps the greatest threat to marine life so we would question why this has not been included in the priorities for research under action 2.1.21.</p> <p>Access to the environment</p> <p>Objective 3 (increase awareness and appreciation of biodiversity and ecosystem services), should identify measures to be taken to protect and enhance access to the environment. While recognising the property rights of landowners, mechanisms need to be put in place so that recreational and</p>

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	scientific access to common, or publically owned areas, e.g. the coastline, river banks, upland commonages, is not unduly restricted.
	Deer/Badger census
	The IWT would like to see a scientifically based census of deer and badger populations. These are vital if we are to manage deer and monitor the impact of the state's badger culling programme respectively.
	Golden Eagle
	Action 4.5.3 should include the golden eagle as the target for a species action plan as this important reintroduction programme is at risk of failure.
	The Gearagh
	Action 4.5.2 should include a stated aim to restore the woodland of the Gearagh in Co. Cork, by working with the ESB to establish appropriate water levels.
	Wildlife Crime
	Under Target 4.6 there should be an action to establish a wildlife crime unit within An Garda Síochána.

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	<p>We agree in general with the retention of the seven strategic objectives with the intention to see them through to completion. Below we have some specific comments on the proposed actions which are mainly related to our main area of work in recent years i.e. High Nature Value (HNV) farmland which has the potential to cover 40% of Ireland. Support for the sustainable management of this key resource which encompasses much of the farmed Natura of Ireland (and land outside designated areas of similar quality) could go a long way to realising the objectives of this national biodiversity action plan. Our knowledge of the distribution, extent and characteristics of HNV farmland in Ireland has expanded significantly over the duration of the last biodiversity action plan with research project undertaken by Teagasc, IT Sligo, NUI Galway and EFNCP. On the ground pilots testing innovative approaches to the enhancement of biodiversity on HNV farmland (e.g. BurrenLIFE Programme; AranLIFE; RBAPS pilots-Leitrim and Shannon Callows) are receiving EU wide recognition. The lessons learnt from the HNV farmland work in Ireland is harnessed in a wider EU Horizon 2020 project HNV Link. This project links 10 learning areas across Europe to develop and share HNV innovations across the EU. These innovations can be harnessed to simultaneously improve the socio-economic viability and environment efficiency of HNV farmland. Signatories to this Submission:</p> <p>Centre for Environmental Research Innovation and Sustainability, Institute of Technology Sligo (James Moran and Caroline Sullivan).</p> <p>European Forum on Nature Conservation and Pastoralism (Gwyn Jones).</p>
	<p>2. General Feedback on the Plan Overall</p> <p>a. The plan is very welcome as it tries to cover a lot of topics to improve Ireland's biodiversity and its recovery. A lot of work must have gone into producing the plan and it must have been difficult given the limited resources available.</p> <p>In general, I feel there are more actions the plan should include for each target and that the indicators and expectations for each action should be clearer and more challenging to the Actors and key partners.</p>

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	<p>It is unclear to me why the term 'strategic' is included in the title now. Each of the three National Biodiversity Action Plans has now got a slightly different name which means that the public loses the continuity of the revisit and review to the plan each time. The renaming steers people away from comparing and contrasting each document and leads people to view the document as a stand alone policy unrelated to the previous. I think it's important that the name be consistently re-used each time the document is reviewed and updated.</p>
	<p>It is confusing to the reader as to whether each National Biodiversity Plan supersedes or entirely repeals the objectives, targets, actions and indicators of the previous plans. It is critically important that the proposed plan clearly state what the position is regarding this matter. Terms like; "building on previous plans' momentum" brings very little clarity.</p>
	<p>The reader needs to know Are the objectives, targets, actions and indicators of the previous two plans active or not? The plan should clearly state this.</p>
	<p>b. The NBSAP has far too many inadequately defined Performance Indicators. Far too many are not quantifiable and have no detailed deadline. 'Number of ...' is commonly used and is too vague. 'Number of...' is not a quantity that is assessable by any adequate means. All Performance Indicators should have the capacity of being quantifiably assessed as being met or not by a specified time by the public.</p>
	<p>c. Readily available quantity data for biodiversity for Ireland as a whole is very scant and sporadic. There is limited measurable data on species density, richness or diversity indices at national and lower scales for example. Most data focuses on designated sites or designated species or specific habitat types Or is indicative (ie potential likelihood of species or diversity present in locations). For example the mapping of High nature value farming locations is an indicative process. Datasets are often not readily comparable in terms of units of biodiversity measurements across locations. Much more focus needs to be placed on recording common units of biodiversity measurement.</p>

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	<p>I urge that it is more beneficial to have a recurring National Biodiversity Inventory for the Island as a whole than to just rely on national indications or measuring populations within habitats of interest or designated sites. This inventory should include permanent sample plots so that we can observe biodiversity change overtime. It should also include random sample plots as supplementary and comparison data sources. One agency should be authorised to conduct the Inventory. It should be adequately resourced and regularly repeated eg every 5 years. It should be conducted during the four seasons each time and at the same week period. It should record not only habitat and plant communities but also, the full range of fauna. Results should be sufficient to determine quantifiable data on biodiversity change, at national, regional, county and local authority scales. The results should be used to set Biodiversity Retention Targets at those scales in terms of habitat and species, or species communities that has measurable units eg areas of habitat types/ species density to be retained nationally, regionally at county level etc.</p>
	<p>Only when we have adequate information on what we have can we plan an adequate way forward. When are able to produce National Biodiversity Inventory results, state sectors, agencies and planning authorities can adequately analysis what biodiversity they have and how it is changing overtime. With that information they can be more informed on cumulative impacts of planning, and identify when losses due to development are getting close to Biodiversity Retention Targets.</p>
	<p>I respectfully urge that progress begins on a Recurring National Biodiversity Inventory and Biodiversity retention targets at all scales from this NBSAP going forward.</p>
	<p>d. I feel there is a disconnect between various Strategic Goals among Departments and Sectors of the State. Food and Agri and Forestry Production Targets, Economic Growth Targets, Spatial Growth Targets, Transport Targets and Energy Production Targets are competing for Landspace. Land-use planning is struggling to balance the environmental and biodiversity goals against these demands. It could be that the Food Production targets, Forestry targets, Road or Windfarm targets are incompatible with Biodiversity Recovery and Maintenance targets of valued habitats. A national conversation on this matter is urgently needed.</p>
	<p>I would also suggest that recurring Biodiversity Policy Coherence Assessments be conducted within Departments and their Divisions but also Across Departments and Sectors of the State to identify conflicts and resolve issues.</p>



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	<p>I'm not sure where this fits into the NBSAP but it needs to fit in there somewhere. The National Biodiversity Inventory and biodiversity retention targets outlined above in 2 c would help with this national conversation and recurring coherence assessments. Well done on the good work so far. It is not easy and you likely have limited resources. I believe you all do great work in advocating for Ireland's biodiversity. Yes, my contribution may be published but should be kept anonymous (without my name and/or organisation details)</p>
	<p>This submission is being made on behalf of Dublin Bay Biosphere Partnership (DBBP).</p> <p>Biospheres are designated by UNESCO, the United Nations Educational, Scientific and Cultural Organisation, and are places of international importance for biodiversity, which are managed to promote a balanced relationship between people and nature. They aim to promote sustainable use of the environment, by supporting biodiversity conservation, research, education and sustainable development. Biospheres contribute to the implementation of the Sustainable Development Goals of the United Nations Development Programme and Multilateral Environmental Agreements, including the Paris Agreement of the United Nations Framework Convention on Climate Change, the Convention on Biological Diversity and the Aichi Biodiversity Targets. The policy framework to guide the UNESCO Man and the Biosphere (MAB) Programme and the World Network of Biosphere Reserves is provided by the MAB Strategy 2015-2025 and associated Lima Action Plan 2016-2025.</p> <p>Ireland has two UNESCO Biospheres. Dublin Bay Biosphere was designated in June 2015. It covers over 300 km<sup>2</sup> of marine and terrestrial habitat and is home to over 330,000 residents. The designation is facilitated by Dublin Bay Biosphere Partnership (DBBP), which comprises Dublin City Council, Dublin Port Company, Dun Laoghaire-Rathdown County Council, Fáilte Ireland, Fingal County Council and the National Parks &amp; Wildlife Service of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. To achieve the UNESCO Biosphere objectives, DBBP works with schools, universities, NGOs, community groups and businesses.</p> <p>It is my understanding that the National Parks &amp; Wildlife Service and Kerry County Council recently submitted a draft Periodic Review of Killarney National Park Biosphere to UNESCO with the aim of maintaining its Biosphere designation and managing it in accordance with the current criteria of the UNESCO MAB Programme.</p>

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	<p>General feedback: The 3rd National Biodiversity Action Plan should include provisions to support Ireland's Biosphere network as it is in line with, and could provide substantial support for, the objectives of this Plan. However, the current Draft omits to mention Ireland's UNESCO Biospheres.</p> <p>At the national government level, Ireland's engagement with UNESCO in relation to the MAB Programme is insufficient at present. Increased support should be provided to the Irish National Commission for UNESCO (Department of Education and Skills) for the delivery of its responsibilities under the Lima Action Plan and to facilitate improved communication between UNESCO and the Republic of Ireland's Biospheres, World Heritage Sites, Geoparks and other UNESCO Cultural Projects. This is important given that Ireland will host the EuroMAB Conference in 2019.</p> <p>If the objectives of the National Biodiversity Action Plan 2017-2021 are to be delivered successfully, very substantial increases in funding and staff numbers are required across the biodiversity sector but particularly within the National Parks &amp; Wildlife Service.</p>
	<p>Please find our observations and recommendations relating to the draft National Biodiversity Data Plan 2017 to 2021.</p> <p>1. We are aware that the term 'biodiversity' includes 'genetic resources' and by extension 'indigenous breeds', however we believe that public and institutional thinking in Ireland has limited awareness of genetic resources being a fundamental part of our national biodiversity, with additional importance for food security and climate action and as such we request that this facet be given more emphasis and space in the document introduction section.</p> <p>There are many examples to support this thinking;</p> <ul style="list-style-type: none"> <li>-the Caldoir Sheep has slipped into extinction, in this decade, essentially unnoticed and undocumented</li> <li>- the Old Irish Goat and several other indigenous breeds remain officially unrecognised in Ireland</li> <li>- the UK is generally credited with saving the Irish Moiled and Irish Dexter</li> <li>- the disproportionately limited budget available to the Animal Genetic Resources Committee in Ireland</li> <li>- there is only one genetic resource orientated group in the Irish Environmental Network</li> </ul>

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	- there is no Genetic Resources NGO representation in the Biodiversity Forum or Group
	- there is no figure 4 style analysis of Ireland's genetic resources conservation status included in the draft biodiversity plan
	- 'Origin Green' as a key national indicator to food production sustainability, as we understand, does not speak to indigenous genetic resource conservation metrics
	- and while the second half of the CBD, objective one, speaks to genetic resources , the term 'Genetic Resources' or its more familiar connotations does not feature in the 12 page introductory section of the draft Biodiversity Plan, save for the CBD quote itself.
	2. We request that the plan explain genetic resources and their specific value, this plan is a crucial opportunity to make people aware of undervalued agricultural genetic resources and its place in the wider context of agriculture, habitats and species.
	3. We request that the term 'genetic resources' be included in the plan's definition of biological diversity alongside 'terrestrial, marine and other aquatic ecosystems'.
	4. We request that the national biodiversity plan make space for a specific objective 8 dedicated to Genetic Resources
	5. With regard to 'The State of Ireland's Biodiversity' this section demonstrates the value of directives, we suggest that Ireland campaign for an 'Indigenous Breeds Directive'.
	6. Further specifically there are no metrics on the state of Ireland's Genetic Resources, we know for example that a number of breeds are threatened, we request these be noted.
	7. We note that the 2017-2021 draft, unlike the previous 2011 -2016 plan, does not specifically mention the 'Precautionary Principle' as outlined in the Rio Declaration on Environment and Development and referenced in the Convention on Biological Diversity. This is especially an issue for Irish Indigenous Breeds as several are as yet not researched or recognised due to lack of resources. The Old Irish goat Society, has worked for several years under the principle, with the support of the Animal Genetic Resources Committee, and this is something to recognise and highlight as a positive contribution in future national reports to the Convention, particularly when the breed is officially recognised. The inclusion of this principle is important because actors with vested interest, will seek to dismiss the legitimacy of conservation without first proof of authenticity. We believe much of the research funded by the Agricultural Genetics Resources Committee comes under the principle. The principle and commitment to it should be upheld in this edition of the plan.
	8. We recognise that the 2017-2021 draft refers to overarching Aichi Biodiversity Targets of

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	<p>which 'Target 13' holds relevance, however we suggest that other international genetic resource polices such as the Interlaken Declaration, published in 2007, and the Agenda 21 Chapter 14, published in 1992, be referenced.</p> <p>9. We request a specific capacity building program for Irish for Genetic Resource groups.</p> <p>10. We request a review of the National Genetic Conservation Strategy Document for livestock published in 2013.</p> <p>11. We request the establishment of an Animal Genetic Resources Committee as recommended in the National Genetic Conservation Strategy Document published in 2013. This committee should strive to bring together a cross section of resources from breed societies, those with land and physical infrastructure, heritage conservation and public participation experience as well as scientists.</p> <p>12. We request that the biodiversity plan target a €1,000,000 national fund to be secured for Conservation of Genetic Resources Scheme, as opposed to the current €60,000 national budget distributed over eight fields nationally; Plants (including aquatic plants), Animals, Forestry, Microorganisms &amp; Invertebrates, Aquatics (Fish and Invertebrates), or proportionally some €7,500 per genetic resource sector per annum, from the proportionally vast resources within the RDP.</p> <p>13. While 'in 2013 Irish Aid allocated grants totalling €27,626,000 in respect of activities that were biodiversity relevant or had biodiversity elements. Of this fund around €13,000,000 was substantively biodiversity relevant'. It could be argued that Ireland is exporting 'genetic erosion' to 3rd world countries, which could have long term implications for food security in the host countries. Are there safeguards in place in the countries we export livestock into? As citizens we need accountability on this as the primary global risk to indigenous breeds is importation of exotic breeds. This critical issue reflects the need for a dedicated objective 8 for genetic heritage.</p> <p>14. We request that the fund administered by the Animal Genetic Resources Committee be documented in a similar fashion to the Irish Aid Fund.</p> <p>15. In the interim to achieving an 'Indigenous Breeds Directive' we advocate that the plan seek amendment of the Heritage Acts to afford protection to Indigenous Breeds. As for example although the Old Irish Goat is living heritage, of the same era as famous inanimate Neolithic monuments including the Céide Fields in county Mayo, Poul nabrone Portal Dolman in the Burren and the Megalithic Chamber Tomb, Bru na Bóinne in county Meath, the little known</p>

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	Old Irish Goat, with additional significance for food security and climate change, is not protected under the Heritage Act, or indeed any act. When we consider the challenges being faced by those species that are protected by law, what chance has our obscure genetic resources?
	16. The Old Irish Goat is found in Irish Feral Herd across Ireland although its population still remains unknown. It represents a perceived threat to a biosphere site Kerry National Park, an actual threat to Burren UNESCO in terms of mismanagement of feral herds harbouring OIG, yet, the goat, is embraced in the Dublin Bay Biosphere as a conservation grazer. An unrealised genetic resource and cultural asset whose origins date to Neolithic era which can add unique cultural authenticity to the Wild Atlantic Way and Ireland's Ancient East. With distinctive traits, 12 colour patterns, it has the potential to add value to or perhaps anchor a UNESCO World Heritage Site as a cultural asset and an eco-friendly alternative to herbicide based invasive species control. These opportunities cannot be fully assessed if the current status quo with regard to resources is to remain, we refer to recommendation 9 and 12.
	17. The Old Irish Goat, is threatened by commercial forestry e.g. Drumsnauv, the lack of official recognition and awareness by the national authorities for biodiversity in Ireland is a factor. Whereas the state has recently provided €550,000 in funding to boost tourism potential of commercial forests such that "forests, tracks and trails are ideal for lovers of the great outdoors, nature enthusiasts and those who want to explore Ireland's rich cultural heritage, which is woven into the fabric of the forests". In this instance the Precautionary Principle has been called on to stay the hand of the state in regard to indiscriminate culling of Old Irish Goats, a significant cultural resource to Connemara. With little resources available to help conservation of the Old Irish Goat in Drumsnauv, we refer to recommendation 12.
	18. We request the plan provide a Figure 4 style analysis of indigenous breeds and their conservation status, in relation to the specific measures sought under the Agenda 21 Chapter 14 and principally that we 'guarantee their survival'? Have we sustainable population of unadulterated indigenous breeds, and can we prove it?
	19. We recommend independent EPA style analysis of conservation status of genetic resources, just like we have for, habitats, species and water quality. In other word we have to treat genetic resources to the very same standards as those enjoyed by our legally protected and directive supported biodiversity.
	20. We request that the plan note positive results being achieved in genetic resources, to raise

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	<p>appreciation and awareness.</p> <p>21. With regard to the EU target of ‘halting biodiversity loss by 2020, we request that the plan detail what metrics are being used to measure this goal and what the current trends are versus the resources deployed in the last two plans, with a view to assessing whether we are on target to achieve this goal.</p> <p>22. We request that the plan include a resource section that details the financial and human resources allocated to the plan. These resources need to be benchmarked versus international best practice, e.g. UN guidelines in respect to aid, and EU norms and the minimum resources required to achieving national and international targets. The point is, are the agencies tasked with delivering biodiversity targets, fully staffed and resourced to deliver on international commitments, if not these shortfalls need to be made clear to citizens and their public representatives.</p> <p>23. On a technical note we request that the plan set out how the plan process has adhered to requirements of the Aarhus Convention.</p>
	<p>A Chara,</p> <p>Please find our observations and recommendations relating to the draft National Biodiversity Data Plan 2017 to 2021.</p> <p>The Kerry Bog Pony Co-operative Society would argue that ‘Genetic Resources’ and ‘Native Breeds’, both come under the heading “Biodiversity. The Interlaken Declaration on Animal Genetic Resources calls for prompt action to prevent resources being lost through inaction and recommends the Global Plan of Action as the appropriate instrument to address this challenge.</p> <p>“ We acknowledge that maintaining the diversity of animal genetic resources for food and agriculture is essential to enable farmers, pastoralists and animal breeders to meet current and future production challenges resulting from changes in the environment, including climate change; to enhance resistance to disease and parasites; and to respond to changes in consumer demand for animal products. We also recognize the intrinsic value of biological diversity and the environmental, genetic, social, economic, medicinal, scientific, educational, cultural and spiritual importance of breeds of livestock, and our ethical responsibility to ensure genetic resources are available to future human generations.”</p> <p>“More than 7 000 domestic animal breed populations have been developed by farmers and</p>

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	<p>pastoralists in diverse environments in the 12 000 years since the first livestock species were domesticated. These breeds now represent unique combinations of genes. Thus all animal genetic resources for food and agriculture are the result of human intervention: they have been consciously selected and improved by pastoralists and farmers since the origins of agriculture, and have co-evolved with economies, cultures, knowledge systems and societies. Unlike most wild biodiversity, domestic animal resources require continuous active human management, sensitive to their unique nature.”</p> <p>“We affirm the desirability, as appropriate, subject to national legislation, of respecting, preserving and maintaining traditional knowledge relevant to animal breeding and production as a contribution to sustainable livelihoods, and the need for the participation of all stakeholders in making decisions, at the national level, on matters related to the sustainable use, development and conservation of animal genetic resources.”</p> <p>INTERLAKEN DECLARATION ON ANIMAL GENETIC RESOURCES</p> <p>Co-operation between the various state agencies such as the Department of Agriculture/Failte Ireland/Heritage Council et al would increase the efficacy of any conservation plan.</p> <p>The Heritage Council Proposes policies and priorities for the identification, protection, preservation and enhancement of the national heritage. This includes hedgerows for example. But what use is a hedgerow if there are no animals? The traditional small farm in which the rare agricultural breeds existed was species rich in many</p> <p>ways. Traditional hedgerows, non-intensive farming practices and self-sufficiency fostered a rich environment in which insects, birds and mammals thrived. We feel that Agricultural genetic resources have a major national role to play in the conservation of habitats and species. This is recognised today in the Glas Scheme which encourages environmentally friendly farming. While it is not possible to turn back the clock there is an increasing popular interest in the</p> <p>importance of retaining the native richness of the countryside. Agricultural rare breeds can play an important role in this process and further sustain rural communities. They are particularly suited to farming on marginal land or in areas of Tourism such as the Wild Atlantic Way.</p> <p>Today, faced with the needs of a growing population, changes in consumer demand, and the enormous challenge posed by climate change and emerging diseases, we need to cherish the</p>

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	<p>adaptability and potential of our native breeds to face an uncertain future. A national genetic conservation strategy should be put in place protecting all</p> <p>endangered populations of native agricultural Breeds as well as other forms of Biodiversity. We request a review of the National Genetic Conservation Strategy Document for</p> <p>livestock published in 2013 with greater emphasis being placed on in situ conservation. Incentives to promote the use of rare breeds in Ireland should be reviewed. These</p> <p>should include adequate linkages and coordination among the stakeholders. It is recommended to establish a Farm Animal Genetic Resources Committee comprising</p> <p>representatives from all partners involved nationally in genetic conservation particularly the Breed Societies.</p>
	<p>To whom it may concern,</p> <p>SECAD and the B Team, which is SECAD's Biodiversity projects section, welcome the opportunity to comment on the draft 3rd National Biodiversity Action Plan and would like to acknowledge the contributions of all who worked towards developing it.</p> <p>South and East Cork Area Development (SECAD) Partnership CLG is a not-for-profit company dedicated to supporting people, community and enterprise in our region and was established in 1995.</p> <p>The SECAD biodiversity team, or "The B Team" was set up in 2015. Our main aim is to help promote and enhance biodiversity throughout the South, East and West Cork area and to do this by working closely with community based organisations such as tidy town and village groups, schools, environmentally conscious businesses, the farming community and other groups. We also work closely with the Cork County Council, the National Biodiversity Data Centre and charities such as Birdwatch Ireland and Leave No Trace Ireland.</p> <p>SECAD was one of two Local Development Companies that agreed to support, and contribute to the implementation of, the All-Ireland Pollinator Plan at the time of its launch in 2015.</p> <p>SECAD administers the Rural Development Plan, as well as other programmes, across a considerable</p>



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	section of County Cork. We feel that this coupled with our dedicated Biodiversity projects section, has
	us well placed to contribute to supporting the implementation of the National Biodiversity Action Plan.
	Indeed much of the ongoing work of SECAD and the B Team already does so.
	Having read the draft 3rd National Biodiversity Action Plan we have identified many of the plan's actions to which we feel we could contribute. We have also identified some areas which we think may
	need further consideration. Additionally we have identified some areas that perhaps could have greater emphasis within the final plan and some areas which could be added to the plan.
	Suggestions and commented objectives, actions and targets are to be found overleaf.
	Actions we feel we could contribute to implementing are to be found in Table 1 below.
	We hope our comments and suggestions will be of value in progressing the plan.
	Should you need clarification of any of the points raised, or suggestions as to how SECAD and the B Team could be involved in progressing and / or implementing the plan please do not hesitate to contact us. Our contact details can be found on the cover page of this document.
	1 Introduction to SWAN Introduction to SWAN
	The Sustainable Water Network (SWAN) is an umbrella network of 26 of Ireland's leading
	environmental NGOs, national and regional, working together to protect and enhance Ireland's
	aquatic resources through coordinated participation in the implementation of the Water
	Framework Directive (WFD), the Marine Strategy Framework Directive (MSFD) and other
	waterrelated
	policy and legislation. SWAN member groups are listed in Appendix 1. SWAN has
	been actively engaged in Water Framework Directive (WFD) and other water policy
	implementation at both national and River Basin District (RBD) level since 2004, representing
	the environmental sector on WFD River Basin District (RBD) Advisory Councils, the South Eastern
	RBD Management Group, the Irish Water Stakeholder Forum, the Public Water Forum and other
	water policy-related fora.
	2 Comment on the Actions in the Draft National

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	Biodiversity Action Plan
	The Sustainable Water Network welcomes the opportunity to comment on the Draft National Biodiversity Action Plan (NBAP) 2017-2021. Due to limited resources and time constraints SWAN has limited capacity to do a full critical analysis/review of the proposed plan however we would like to support and welcome the inclusion of actions which would contribute to the full and effective implementation of WFD and MSFD objectives in Ireland. In particular SWAN would support the following relevant actions in the draft NBAP to be fully retained in the final NBAP:
	Firstly I would like to welcome this new draft. It is very timely, and I hope it can help Ireland achieve the objectives outlined, which are so important not only for the planet, but for our own sense of national pride.
	I have a few minor comments.
	The table on page 7 shows the findings of species groups that have had Red-list assessments. It omits two of the largest groups - vascular plants and macro-moths. These have both been published and their inclusion, even at this late stage, would greatly enhance the findings of the analysis.
	The document lacks both index and list of contents. And there is no indication of which agency(s) were responsible for its production. I appreciate that the document is only a draft and that you probably intend to address these points in the final edition.
	Ralph Sheppard.
	Re New Biodiversity Action Plan.
	A broad education and ongoing awareness of the importance of biodiversity should be part of any plan.
	This should be for general education and general public.
	All media communication should be used to convey its importance.
	Our unique habitats especially our raised and blanket bogs should be immediately protected.
	Using their resource to deplete and destroy them for fossil fuel is unsustainable and damaging our environment and great habitat loss.
	Our hedgerows are in an equally poor condition. They are degraded and poorly appreciated and mismanaged. Their unique contribution to our biodiversity needs is being lost.

Page	Comment
	Our poor tree cover has been an area of neglect for decades. We must plant more forests, especially mixed and deciduous forests.
	Private and public development must include biodiversity needs and appreciate the beneficial effects from a habitat and human factor.
	Our fresh and saltwater habitats are under pressure from our continuous neglect and disregard for their importance to the wellbeing of our planet. We should reverse this neglect.
	Mainstream education from primary through to third level and continuous education should have biodiversity as part of their course work.
	The benefits of a healthy biodiverse environment would greatly contribute to the physical, mental and social well being of all in Ireland. Public policy should acknowledge this.
	We cannot afford any more habitat loss and degregation if we are to have any plan of action of purpose and credibility.
	Introduction to CIEEM
	The Chartered Institute of Ecology and Environmental Management (CIEEM), being the leading
	membership organisation supporting professional ecologists and environmental managers in Ireland and the United Kingdom welcomes the opportunity to participate in this consultation process.
	CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary
	environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity
	protection and enhancement. It promotes knowledge sharing through events and publications, skills
	development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

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	CIEEM is a member of a number of organisations including:
	· The Environmental Science Association of Ireland
	· Irish Forum on Natural Capital
	· Europarc Federation
	· European Network of Environmental Professionals
	· IUCN – The World Conservation Union
	· Professional Associations Research Network
	· Society for the Environment
	· United Nations Decade on Biodiversity 2011-2020 Network
	· The UK All Party Parliamentary Group on Biodiversity
	· The UK Environmental Policy Forum
	CIEEM has approximately 250 members in Ireland who are drawn from across the private
	consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and
	industry. They are practising ecologists and environmental managers whose work involves
	sustainably managing land, water and species.
	3
	Comments from CIEEM
	CIEEM welcomes the opportunity to participate in the review of the Draft 3rd National Biodiversity
	Action Plan.
	The review has been undertaken by the CIEEM Irish Section Policy Review Group which comprises
	fourteen experienced, Irish-based, practitioners and specialists with a wide breadth of knowledge
	across the ecological and environmental management spectrum in Ireland.
	.....
	The Draft NBAP is a large, complex document and for this reason we are providing our detailed
	comments in tabular form to facilitate cross-referencing. The table below is in A3 format but may be
	scaled to print at A4 if required. It is in three sections:
	· Detailed review comments on content: text, Objectives, Targets and Action Points etc. (pp 1

Page	Comment
	to 7; comments 1 -110)
	· General comments: largely from individuals but which we consider will be of interest / use to the editors of the NBAP (pp 7 to 8; comments 111 to 124)
	· General observations on typographical errors, formatting glitches etc. (p8; comments 125 to 130).
	Overall, we consider the Draft NBAP provides an informed summary overview of the state of
	Ireland's biodiversity with a good vision of what is required with - for the most part - appropriate targets and actions.
	There are however, some issues of concern listed in the detailed table of comments below that include, amongst others:
	· Absence of actions in relation to Natural Heritage Areas and an apparent over-reliance on Natura sites
	· Lack of actions for biodiversity in urban areas
	We also note that there is no Action in relation to the potential impact on biodiversity of Brexit which
	is expected to come into effect during the life of the Plan.
	As CIEEM is the professional representative body of ecological practitioners who record and evaluate
	Irish biodiversity throughout their work, including within the context of planning and development,
	we consider that it would have been useful if CIEEM had been able to input to the NBAP prior to the public consultations stage.
	.....
	CIEEM members are knowledgeable about natural heritage and, as a professional body representing practicing ecologists, CIEEM is well placed to advise on specific areas of biodiversity.
4	CIEEM would welcome any opportunity to discuss amendments to the NBAP and is willing to assist as
	appropriate – at any stage, including reviewing/commenting on proposed amendments as they

Page	Comment
	become available.
	Indeed we propose, as stated above and in the detailed comments provided below, that CIEEM should be a member of the Biodiversity Forum and Working Group
	DAH is listed 43 times as the main or secondary actor in the implementation of the actions listed in the Plan. The NPWS is hugely under resourced
	and while the actions of the Plan are greatly welcomed does the DAH/NPWS have the capacity to undertake all of the Actions it has been/has
	committed to?
	Page 10 of the Plan notes that while 102 Actions were detailed in the second Plan, 24 were implemented and a further 67 are on-going with 11
	requiring substantial further Action.
	Could an additional objective of the Plan to be as follows: to review the capacity of DAH/NPWS to implement the Actions of the new NBAP and
	where there is a shortfall in capacity for Government to commit the resources required for it to do so? This would underline the Government's
	commitment to realistic implementation of the Biodiversity plan and the biodiversity values and ecosystem services that it identifies.
	General comment /Vision Vision is great
	Resources /Funding The plan has to be resourced adequately
	Resources /Data
	Baseline data and proper sampling systems are needed to be able to monitor the biodiversity resource. There are major gaps in our knowledge
	and datasets and this is not adequately addressed in the document. Also there is a need for robust verification of existing datasets.
	Resources/Soils
	Although nutrient cycling by soil organisms is mentioned in the document there are no actions on soil biodiversity. It is omitted from the
	document. See comment under Action 3.1.9 above also.
	Resources/Urban environment
	The urban environment is omitted from the document
	Resources/ Non-protected habitats and species

Page	Comment
	Wider biodiversity ( ie non-protected habitats and species) is not addressed and it is these in general that are providing our ecosystem services.
	Resources /Designated sites There is over reliance on designated sites to deliver biodiversity outcomes.
	Whilst designated sites are an essential tool they will not deliver for wider biodiversity and in particular essential ecosystem services
	Resources /Performance indicators
	In general performance indicators are such that may result in major biodiversity loss not being detected.
	Our Organisation

Page	Comment
	<p>Founded in 1948, An Taisce is one of Ireland's oldest and largest environmental organisations. An Taisce is a charity that works to preserve and protect Ireland's natural and built heritage. We are an independent charitable voice for the environment and for heritage issues. The work of our staff is focused in three areas: Advocacy, Properties and Education. Advocacy: Our Advocacy Unit is dedicated to promoting the conservation of Ireland's nature and biodiversity as well as its built heritage. Properties: We own a range of heritage properties in trust, including historic buildings and natural reserves. Education: Our Environmental Education Unit is responsible for developing and operating some of Ireland's most popular and successful environmental programmes and campaigns. The Environmental Education Unit is the National Operator for all international environmental education programmes of the Foundation for Environmental Education (FEE), including the Blue Flag Award for Beaches and Marinas and Green-Schools, the international environmental education programme in operation across 93% of Irish schools. It also operates a number of national programmes including: Green Campus, Neat Streets, Clean Coasts, National Spring Clean (Ireland's largest anti-litter campaign), Green Home, Green Communities, and the Irish Greening Community Award Programme. Background An Taisce is one of two Environmental Pillar representatives who sit on the Biodiversity Forum. The Environmental Pillar is made up of 28 national environmental non-governmental organisations (NGOs) who work together to represent the views of the Irish environmental sector. While An Taisce represents the Environmental Pillar within the Biodiversity Forum, this submission reflects the views of An Taisce alone. An Taisce has fed into the current draft of the National Biodiversity Action Plan 2017-2021 through our participation in the Biodiversity Forum and we have previously made a submission on an earlier draft of the NBAP. That submission and the previous draft of the NBAP are referred to in our submission.</p>





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	<p>through the work of our staff in the advocacy and environmental education unit (EEU) and through</p> <p>our broad membership base, we welcome the opportunity to contribute to Ireland's third National Biodiversity Action Plan. It is clear that a lot of work has been invested in the NBAP to date. It is greatly improved in many areas since the original draft was presented to the Biodiversity Forum. It is</p> <p>positive that the National Parks and Wildlife Service (NPWS) engaged with a broad range of stakeholders through the forum. The forum was well attended by stakeholders who are actively</p> <p>involved in conservation such as the staff of the Department of Arts, Heritage, Regional, Rural and</p> <p>Gaeltacht Affairs (DAH), environmental Non-Governmental Organisations and Biodiversity/Heritage</p> <p>Officers. Sectors such as agriculture, forestry, fisheries and mining have been less well represented</p> <p>to date. Close cooperation with these stakeholders will be key over the life of the NBAP and it is</p> <p>important that steps continue to be taken to nurture collaboration through the Biodiversity Forum and other initiatives.</p> <p>The work of the NPWS is extremely important. The National Biodiversity Action Plan will form the</p> <p>guiding framework for the NPWS over the next four years and will therefore play an important role</p> <p>in protecting biodiversity, human health, water quality, climate regulation, land protection, coastal protection, etc. As the responsibilities of the NPWS are broad and of critical importance it is</p> <p>important that they are resourced properly. Currently this is not the case, and unfortunately the</p> <p>Government Department which it falls under, the Department of Arts, Heritage and the Gaeltacht</p> <p>(DAHG), is under-resourced compared to other Departments. Either more resources are given to the</p>

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	<p>DAHG to help fund the work that the NPWS do or the NPWS be moved to fall under the remit of</p> <p>another Department such as the Department of Communications, Climate Action, and Environment, then it could have access to more resources than it currently receives.</p> <p>The resources at the disposal of the NPWS will play a pivotal role in determining what objectives will be achieved. This draft NBSAP 2017 – 2021 does not mention anything about what financial</p> <p>resources will be allocated to the Department of Arts, Heritage and the Gaeltacht to implement the actions within this plan. It is noted however that there is a newly created action (1.1.15) on</p> <p>developing and implementing A National Biodiversity Finance Plan which is a good step forward for</p> <p>increasing the visibility of funding for biodiversity within government departments and should be kept within the final document.</p> <p>In our opinion, one of the most obvious issues with the current plan is that far too many of the</p> <p>actions relate to gathering further data on the threats and pressures driving biodiversity loss. These actions seem to have been prioritised within the plan ahead of clear targeted actions to halt</p> <p>biodiversity, based on the substantial evidence which exists on what the issues are and what needs</p> <p>to be done. It is clear from the NPWS's Article 17 and Article 12 reports on the implementation of the Habitats and Birds Directives respectively that current and future conservation threats and</p> <p>pressures on habitats and species are well known. The species which need prioritised action are also</p> <p>known. It is also clear, based on the terminal declines in the conservation status of many habitats</p> <p>and species over the last twenty years that if serious action is not taken immediately, there is no hope of saving many of our most cherished species from the abyss of extinction. Many of these</p>

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	<p>issues are not unique to Ireland or even the EU. It is accepted that we are living through the Earth's sixth mass extinction event and that this stark chapter in our planet's history is being driven by human activities. The major pressures on biodiversity globally include: loss, degradation and</p> <p>fragmentation of natural habitats; overexploitation of biological resources; pollution; the impacts of</p> <p>invasive alien species on ecosystems; and climate change and the acidification of the oceans. We</p> <p>know that in Ireland the main drivers of biodiversity loss are unsustainable land use change and</p> <p>unsustainable resource use. The main sectors driving these pressures are the agricultural sector, the forestry sector, mining including peat extraction, fisheries and aquaculture, and infrastructure.</p> <p>These sectors are regulated by the government, driven by government policy or in the case of Bord na Mona or Coillte owned or part owned by the government. It is very clear that the government</p> <p>therefore has it within its power to make huge strides in tackling biodiversity loss over the next four</p> <p>years, if the will to do so exists. This could be achieved by improving environmental regulations and</p> <p>enforcement. By ensuring that the most damaging sectors start operating in a sustainable way and that they are legally compliant with Irish and EU law. Government and sectoral policies and strategies must be reviewed and altered so that they are compatible with the cross-cutting challenges of biodiversity loss and climate change.</p> <p>In the past, top down approaches to conservation have in many instances hindered progress and</p> <p>created distrust and resentment towards the NPWS and environmentalists. Communities must be</p> <p>educated about the importance of biodiversity and empowered to lead the way in its conservation.</p>

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	<p>Bottom-up solutions are clearly the way forward but they are not strongly emphasised within the NBAP. Conservationists must work closer together in collaboration with each other and with the broader community. Agri-environmental schemes should be place-based, targeted, multi-annual and developed in collaboration with farmers and environmental experts. Structural supports for farming, such as decoupled area-based payments, have driven environmental degradation and failed to protect small and marginal farmers or prevent the ongoing collapse of many rural communities.</p> <p>We need rural development policies which offer more than socialism for the rich and free market economics for the poor. We need to reward the custodians of biodiversity and offer incentives which are consistent with the true services they provide. This means looking beyond the myopic lens of the volume of food produced and start looking at the quality of food produced, the added value, the ecosystem services supported and the true socio-economic benefits. The intangible benefits of biodiversity must be valued while at the same time we must not reduce them to commodities which can be dispensed with by the highest bidder.</p> <p>The Polluter Pays Principle must be enforced. Our environment belongs to us all, to all living things and to future generations. No one should have the right to damage or degrade our shared birth right for their own short term benefit. Anyone who does damage the environment should have to pay to have it restored. Any industries which are externalising the true cost of their operations on the environment and society are not compatible with the indivisible reality that we live on a finite planet with a limited capacity to absorb our pollution and replenish its resources. Such industries must evolve to reflect this reality or be forced to go extinct and be replaced with systems which operate in</p>

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	a way which ensures that species have the right to exist and that the long-term interests of society are more important than the short-term interest of the few.
	It is true to say that biodiversity does not recognise political boundaries and Ireland and Northern Ireland share the same biogeographic space with many species moving between the two territories.
	Ireland is a single geographic entity and therefore an all-Ireland approach is necessary to safeguard biodiversity on this island. It is positive to see that there are many actions where North/South cooperation on biodiversity issues is highlighted. There are actions where more of a one island approach would be beneficial and we have highlighted this in our comments.
	The format adopted in the report to outline the actions is positive. The use of Timeframe, Actors/key partners, Performance indicators, Baseline and Related Actions is good in principle but could be strengthened in the final draft. A major issue with this report is that there is very little coherence, continuity or accountability between the previous two action plans and this one. It is very hard to get any sort of grasp of what the relationship between the actions in the previous plans is to the actions in the current draft. In many cases, actions in the previous plans which have not been achieved are carried forward into this plan without any explanation on why they were not previously achieved. Shockingly there are key actions in the previous plans which have disappeared from the current draft without explanation. The baseline column in the report should refer to whether the action is like an action in the previous plans and what was achieved or otherwise and why.
	There is a clear need for a mid-term review and an ex-post review. This should be carried out in consultation with the Biodiversity Forum. Funding should be allocated to stakeholders to facilitate

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	<p>meaningful input. This mid-term review will be imperative to ensure that actions are being progressed and if necessary actions are reassessed. The previous draft of the NBAP contained a midterm</p> <p>target column and this should be reinstated. The timeframe for most actions is far too open, generally, and should be tied to the mid-term review. This would create extra onus to achieve actions early on which are part of the purpose of indicating timeframes in the first place.</p> <p>The list of Actors/Key partners is far too restricted and this point strikes upon one of the core shortcomings of the NBAP and the Irish approach to conservation and governance in general. Most actors mentioned are public authorities. There is an underrepresentation of grassroots engagement. There is little reference to eNGOs or community groups. Wherever grassroots stakeholders are mentioned such as farmers it is usually in relation to top-down schemes or education rather than grassroots engagement, the notable exception being the Locally Led Agri-Environmental Schemes.</p> <p>ENGOS are very poorly represented in the current draft. Despite the Irish Environmental Network (IEN) representing 33 Irish eNGOs, representing thousands of Irish people spread across communities covering the length and breadth of the country, they are mentioned twice. The Sustainable Water Network, a key stakeholder on all water related issues are not mentioned. For example, there are five eNGOs in the IEN alone who specialise in native woodland conservation.</p> <p>These groups, like An Taisce, are membership based organisations who roots are deeply embedded in grass-roots conservation. Despite this none of these groups are mentioned and instead Woodlands of Ireland, a quango funded by the Forest Service (Department of Agriculture, Food and the Marine), National Parks and Wildlife Service (Department of Arts, Heritage and the Gaeltacht) and the Heritage Council is seen to tick the stakeholder box. There is a fundamental difference</p>

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	<p>between communicating to communities how you intend to conserve the environment, and asking them what needs to be done and empowering them to be the guardians of their own heritage.</p> <p>There</p> <p>has been a poor record in engaging communities on conservation, an issue that we will not</p> <p>elaborate on further here, but it is clear that while things are improving there is still a long way to go. Broader Irish society, outside of the farming community, is not meaningfully empowered to</p> <p>influence key government policies which are fundamentally altering the nature of our present and</p> <p>future environment and our standards of living. This is unlikely to change over the life of this NBAP,</p> <p>but it is key that the plan is altered to include more public engagement and participation. Actions must be developed to empower communities to get down in the trenches and tackle local level</p> <p>conservation issues head on. There are some great examples of what can be achieved both by local</p> <p>organisations of Ireland's eNGOs and by independent community groups such as those in Abbeyleix (Laois), Ballydangan (Roscommon) and Boleybrack (Leitrim). Community level action must be</p> <p>encouraged by ensuring that groups have access to targeted funding, expertise and land. Groups</p> <p>need to have access to important conservation sites if they can play their part. These sites may be</p> <p>National Parks or land in the ownership of semi-states like Bord na Mona or Coillte. In the case of</p> <p>Abbeyleix the bog has been leased to the community from Bord na Mona. In the case of An Taisce</p> <p>owned Mongan Bog, the bog was acquired by An Taisce from Bord na Mona. An action should be</p> <p>adopted which considers the opportunities of renting or selling important habitats to communities</p>



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	<p>or conservation bodies on the basis that they will forever be managed for conservation purposes. Biodiversity, ecosystem services, and the need for protecting nature is vital to our economies,</p> <p>human health and wellbeing. Ireland needs the NPWS to be more outspoken on these issues. The NPWS needs not just people with a background in ecology, policy and law, but experts in communications and marketing as you really need to sell the benefits of nature to the public to</p> <p>increase the general understanding of its importance to us in our everyday lives. What is really a</p> <p>priority is a Communications Plan/Campaign to address the above concerns. There should be staff</p> <p>within the NPWS who focus specifically on communication and community engagement. The NPWS should take a leaf out of the book of their equivalent bodies in the United States of America who use</p> <p>social media to promote the good work that they do and encourage people to visit National Parks. The EPA Catchments Unit is doing some excellent work in public outreach by using e-zines and magazines to educate and raise awareness of their work.</p> <p>Many of Ireland's habitats and species of conservation concern are semi natural and linked to traditional farming practices and grazing regimes. Many others are associated with marginally</p> <p>productive land which, due to abiotic factors such as climate and soil type, have avoided to some</p> <p>extent the loss of biodiversity associated with intensifying land uses. Many of the conflicts which arise from designation are due to the lack of consideration given to the role of the prevailing socioeconomic</p> <p>situation within these farming communities. Greater efforts should be made to identify</p> <p>the connection between conservation and the sustainable development of farming communities on</p> <p>marginal land. Teagasc the DAFM and the DAH have a role to play in identifying any cross over. The</p>

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	connection may be well known to members of the NPWS but unless explicitly documented and
	addressed with other departments such as the DAFM, then policies will continue to fail to consider
	biodiversity and the environment when designing national policies around the development of the agriculture, forestry and fisheries for example.
	The scapegoating of the EU and the Habitats and Birds Directives for political expedience seriously undermines the public perception of the Natura 2000 network and emboldens communities to openly defy environmental legislation. Cross party support for the National Biodiversity strategy
	should be sought and at the core of this there should be an acceptance that the Nature Directives are fit for purpose and that national level implementation must improve.
	The distribution of designated sites is concentrated in marginal farming land in the West and in upland areas. The perceived or real burden of designation is therefore often unfortunately placed on
	the shoulders of communities who are already struggling to make a living against a backdrop of
	social issues such as emigration, the loss of jobs and services, and an ageing population. There are
	also other external pressures which undermine livelihoods such as market pressures resulting from globalisation. National and EU policies have not gone far enough in countering these issues as
	farming policies continue to support intensification and there are insufficient market mechanisms to differentiate between intensively and sustainably produced produce.
	The report touches upon many of the key conservation issues but not in enough detail to give any indication of what specifically will be done, by who and in what timeframe. Many of the most important actions in the plan are too high level to be meaningful. This in effect means that any
	action that is carried out which falls within the very broad definition of the action will be reported in the fourth NABP as having progressed this issue. For example action 5.1.2 states "Implement

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	measures to achieve good ecological and environmental status of marine and coastal habitats as required by the Habitats, Directive, Water Framework Directive and Marine Strategy Framework
	Directive (MSFD) and in line with the OSPAR Convention.” The NBAP should set out detailed actions which will contribute to the achievement of good ecological or environmental status under the
	Habitats Directive, Water Framework Directive, Marine Strategy Framework Directive (MSFD) and
	the OSPAR Convention. These should be supported by details on Key Actors/Partners, Timeline etc. While it is vital that specific targeted actions are developed, and implemented to address
	conservation issues it is important that we do not forget to see the wood for the trees. Species
	function as an element of a broader interconnected whole. Greater effort should be made to
	identify overlap is conservation priorities. Identifying measures that will benefit habitats and a
	number of species of conservation concern will be a more efficient use of resources than tailoring
	very specific measures for individual species. The overlap between upland designation of terrestrial
	habitats and High Status Sites under the WFD is an example of this. Efforts should be made to
	expand agri-environmental schemes which support traditional High Nature Value farming. Measures
	which are blinkered by the need to address issues in one species alone may have knock-on negative
	impacts on other habitats and species. For example riparian measures within forestry plantations
	may be of benefit to freshwater pearl mussel but the facilitation of further commercial forestry in
	upland areas will ultimately have negative impacts on many upland habitats and species.
	One of the most glaring omissions from the NBAP is our network of Natural Heritage Areas. Ireland’s
	Natural Heritage Area (NHA) network is the basic designation for wildlife. Along with our national

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	<p>parks and the Natura 2000 network they form the foundation of our network of protected sites. The protection they provide is critical to prevent the biodiversity loss. In addition, they provide connectivity between other protected sites and help to reduce the negative impacts of fragmentation and are important in providing resilience against pressures such as climate change.</p> <p>On a basic level these sites have been protected under national legislation, the Wildlife (Amended) Act 2000, because they are considered important for the conservation of habitats and species which need protection and are of national importance. Given the pivotal role that Ireland's NHAs and proposed National Heritage Areas (pNHA) play in the conservation of biodiversity, An Taisce would have expected them to feature strongly in the NBAP. Incomprehensibly this is not the case.</p> <p>The July draft of the NBAP contained action "6.15.1 By 2018, review policy regarding designation of Natural Heritage Areas." With a performance indicator of "Review completed" and a Baseline of "Policy in regard to pNHAs is currently under review."</p> <p>This was the sole action within the NBAP which related to NHAs and it has been removed from the current draft. An Taisce find it incomprehensible that one of the most important tools for biodiversity conservation has been completely deleted from the agenda. Based on the text and the Irish state's record of conserving the NHA network it is not entirely clear whether a review of the pNHAs would benefit biodiversity, at least not the kind of review that could be implied. Only 148 peatland NHAs out of the 800+ NHAs identified in the 1990s have been statutorily designated and given legal protection. This is unacceptable. At the moment we have a situation in this country</p>

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	<p>where the only sites that are protected are either estates that were gifted to the Irish people and made National Parks or SACs and SPAs which are the result of European Directives. The NHAs that have protection have only been designated as the result of legal action by the European Commission.</p> <p>Under the previous NBAP it was identified under target 16 that “Although some NHAs have been designated, a systematic programme for NHA designation has not been undertaken and some 600 areas proposed as NHAs in the 1990s have not been protected yet by designation.”</p> <p>This target had two associated actions:</p> <p>16.1 By 2015, review previously proposed Natural Heritage Areas and designate as appropriate under the Wildlife (Amendment) Act, 2000.</p> <p>16.2 By 2015 strengthen the coherence, connectivity and resilience (including resilience to climate change) of the protected areas network using, as appropriate tools that may include flyways, buffer zones, corridors and stepping stones.</p> <p>The performance indicators for these actions were:</p> <p>§ Number and area of NHAs designated</p> <p>§ Number and area of sites that meet criteria for NHAs but are not designated</p> <p>§ Fragmentation index</p> <p>There must be an action within the NBAP which commits to the full designation of a large proportion of the 600+ identified pNHAs to full NHA status. Many of our pNHAs also have SAC and/or SPA designation already so designating these sites should not be complicated. An Taisce call of the DAH to reinstate target 16 of the second NBAP and ensure that designation process of Ireland pNHA is completed.</p> <p>In the advocacy section of An Taisce we use our prescribed functions within the planning and forestry consent systems to ensure that Ireland’s built and natural heritage is conserved. We have</p>

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	first-hand experience of the enforcement of environmental regulations and legislation. It is clear that
	the level of protection afforded to Ireland's pNHA and NHA network is not adequate. Indeed there is
	so little information available on the pNHA network that it makes it almost impossible to identify how projects will impact upon their qualifying interests. NHAs need site synopsis, conservation
	objectives and management plans. The Wildlife Act should be amended to ensure that NHAs are
	afforded the same level of protection as SAC and SPA. They should be subjected to the same level of protection as that provided under Article 6 of the Habitats Directive.
	Another key conservation tool which is completely absent from the NBAP is the Threat Response
	Plan. Regulation 39 of the European Commission (Birds & Natural Habitats) Regulations 2011 (SI No.
	477), provides a mechanism to fulfil the objectives of the Habitats Directive or the Birds Directive, to protect designated habitats and species through the development of an appropriate threat response
	plan to "cease, avoid, reverse, reduce, eliminate or prevent the threat, pressure, hazard, combination
	of threats, pressures or hazards, adverse effect, pollution, deterioration or disturbance."
	The July draft of the NBAP had identified the implementation of threat response plans as a fundamental tool for achieving the objectives of Target 6.3 over the duration of the NBAP. It
	contained Action "6.16.1 Implement species' threat response plans where necessary and review and
	update as required," which has been removed from the current draft. An Taisce believes that Article
	39 of the Bird and Natural Habitats Regulations is a critical tool to bring about a rapid response to

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	imperative conservation issues. Given the scale of biodiversity loss over the last two decades and the
	poor conservation status of many of Ireland's designated habitats and species, it is obvious that the
	threat response plan will be more necessary than ever over the course of the next four years. An
	Taisce calls on the NPWS to reinstate an action on threat response plans and extend its scope to include habitats i.e. Implement species and habitat threat response plans where necessary and review an update as required.
	Through the work of the advocacy unit of An Taisce, we are very aware of the key role that
	environmental law and regulation plays in protecting biodiversity. The Wildlife Act (amended) 2000
	is one of the pillars of Irish environmental protection. It is therefore of great concern to An Taisce
	that the protection afforded by Section 40 of the Wildlife Act is under direct attack within this NBAP.
	Based on the actions which relate to the Heritage Bill in the NBAP dismantling Section 40 of the Wildlife Act will be a key goal within the life of this NBAP. As we have highlighted in our later
	comments, the proposed changes to the dates for hedge cutting and burning are not in line with the
	objectives of this plan and it is clear that it undermines many of the actions and targets throughout the plan. Based on the available scientific evidence from Ireland and the UK it is clear that this action
	will drive biodiversity loss and may drive the regional extinction of species like yellowhammer even
	over the course of the envisaged two-year trial. We call on the NPWS to remove any reference to
	the Heritage Bill from this NBAP. In addition to the fact weakening Section 40 of the Wildlife Act is

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	<p>not aligned with conserving and enhancing Irish biodiversity the Heritage Bill has yet to be debated</p> <p>by both houses of the Oireachtas. It is therefore completely inappropriate to assume that any such changes will be enacted over the life of this NBAP.</p> <p>Some of the other pillars of Irish environmental protection are Birds Directive [79/409/EEC as amended 2009/147/EC] and the Habitats Directive [92/43/EEC], the Water Framework Directive [2000/60/EC] and EIA Directive [85/337/EEC]. In 1997, the Habitats Directive was transposed into Irish national law and the relevant Regulations, through the European Communities (Natural Habitats) Regulations, SI 94/1997. These Regulations have since been amended by SI 233/1998 &amp; SI 378/2005. The Regulations were subsequently revised and consolidated in the European Communities (Birds and Natural Habitats) Regulations 2011, SI 477/2011. The Birds and Habitats Directive were submitted to a 'Fitness Check' over recent years by the European Commission. This process had two important outcomes. Firstly, it demonstrated that Irish and EU citizens care deeply about biodiversity and believe a lot more should be done to tackle biodiversity loss in the EU. An EU record of over 500,000 people spoke for nature, signing the documents of the European Commission's consultation process in summer 2015. On a per-capita basis Ireland had one of the strongest public responses to the consultation process. The second outcomes was that the European Commission's 'Fitness Check' concluded that the directives were fit for purpose and that their failure to halt biodiversity loss to date was attributable to poor implementation at member state level. The Commission identified many challenges and problems, such as insufficient management and lack of adequate investment in the Natura 2000 areas, among other issues. The</p>



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	<p>evaluation discovered the need for improved implementation and better coherence with ‘broader socio-economic objectives’. It is clear that in Ireland and the rest of the EU, poor implementation is the greatest hindrance to the Directives in their capacity for preventing biodiversity loss. Many of the reasons for this are well known by the NPWS and are outlined in their own department’s submission to the fitness check consultation.</p>
	<p>The next step of the Commission will be to develop an Action Plan to ‘correct the deficiencies’ in terms of implementation of the Directives. This will include, “in partnership with Member States and relevant stakeholders, appropriate implementation guidelines for regional actors, reducing unnecessary burdens and litigation, and incentivising national and regional investment in biodiversity”. There is a need for this process to be mirrored at national level and there should be a number of actions in the NBAP which look to address ongoing implementation issues. An Taisce are in on-going contact with the Commission on a number of implementation issues and will continue to work for better nature conservation. An Taisce, BirdWatch Ireland and the Friends of the Irish Environment have extensive expertise in ongoing implementation issues across the Birds Directive, Habitats Directive, the Water Framework Directive and EIA Directive. We are more than willing to support actions which seek to identify and resolve compliance and implementation issues.</p>
	<p>In the summary for Objective 1, there is a small paragraph on the importance of the role of local action in conserving biodiversity. However, all it mentions is that local authorities shall review and update their respective Biodiversity/Heritage plans. There are no specifics on what they should</p>

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	<p>contain, how they can be used to assist the Irish Government in achieving national and international biodiversity targets, and definitely no mention on how they will be supported, other than producing more guidelines to deal with appropriate assessment etc. In essence, this draft National Biodiversity Plan (NBP) doesn't seem to recognise how important Local Biodiversity Action Plans (LBAPs) could be</p> <p>to contributing towards national, EU and international biodiversity targets that Ireland is obliged to meet. Decisions and actions that affect biodiversity are often taken at the local level, and this NBP will only be implemented if there are corresponding action plans developed and implemented at the sub-national and local levels. What is crucially needed by local authorities is a sustained investment and increase in their capacity, in terms of financial and human resources, from the Department and much more in the way of Local-National alignment and collaboration with respect to the NBP and LBAPs. There should be a Biodiversity Officer in every local authority in the country who can actually implement local actions, and there should be a dedicated national Biodiversity Fund for implementing actions within LBAPs, similar to the programme for Heritage Officers and the Heritage Plan Fund administered by the Heritage Council. Speaking of the Heritage Council, a way to strengthen the ecological expertise within that body would be the reinstatement of the post of a technical officer for Wildlife. That post was a crucial link between local authorities and the relevant National Department. Also, more people with environmental science and policy backgrounds should</p>

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	be employed across national government departments so as to allow them to work on biodiversityproofing
	plans and policies, as is called for in Objective 1of the NBP, “Mainstream biodiversity into decision-making across all sectors”.
	This submission is made on behalf of Dublin City Council. In this regard, please note that the Parks and Landscape Services Division is the responsible section for biodiversity within Dublin City Council.
	Dublin City Council has a Biodiversity Officer and a Biodiversity Facilitator, and published a new Biodiversity Action Plan in 2016.
	It is noted that there is no NIR for the draft plan. While there may be legal ambiguity as to the requirement for this, it certainly sends the wrong message.
	It is noted, that despite the number of actions in this draft plan that require input from biodiversity officers, that none currently sit on the Biodiversity Forum, and none were directly consulted as part of this draft plan. Do Local Authorities have the capacity to deliver these actions?
	Certain actions (particularly those related to local level actions) appear to duplicate what local Biodiversity Action Plans are supposed to do. A stronger commitment to LBAP’s would be of greater benefit.
	It is noted that there is no reference to urban biodiversity anywhere in the draft plan, despite the fact that all our main cities sit on rivers and support a diverse range of habitats and species. There is also a distinct lack of references to planning, infrastructure and development which all have significant potential impacts.
	The timeframe for certain actions, particularly those related to invasive species regulations, needs to be revised, and actions prioritised.

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	There is an overreliance on the concept of ‘no net less’, but this is not a realistic or achievable vision. The references to biodiversity ‘offsets’ is of particular concern, as it implies that we can pay our way out of biodiversity loss.
	There is an overreliance on actions for more research, reports, and working groups, and not enough actions for direct conservation of habitat and species.
	A joint submission by all Biodiversity Officers has been submitted and this details specific concerns with the plan’s actions. Dublin City Council requests that the concerns and recommendations outlined in their submission are taken on board.
	If you have any further queries on any of the above, please do not hesitate to contact us:
	Context for this submission
	Mountaineering Ireland welcomes the development of the 3rd National Biodiversity Action Plan and the
	opportunity to respond to the draft plan. Mountaineering Ireland’s primary concern in making this
	submission is that Ireland’s upland areas, and their value for biodiversity and society, should have greater prominence in the final version of the Biodiversity Action Plan. As the national representative body for walkers and climbers on the island of Ireland, Mountaineering Ireland has a particular interest in ensuring the sustainable use of Ireland’s upland areas, incorporating mountains, hills, bogland, forests, cliffs and coastline. Mountaineering Ireland has over 11,800 members, the majority of whom are affiliated through 185
	egistered clubs. More than 85% of Mountaineering Ireland members regularly participate in hillwalking.
	Mountaineering Ireland recognises that the upland landscapes which provide the inspiration and the

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	<p data-bbox="208 228 1400 608">place for outdoor recreation activities are often important habitats and physically fragile, and that recreation activity has an impact on the natural environment. Mountaineering Ireland encourages its affiliated clubs to each appoint an Environmental Officer, and the organisation provides a programme of support including 6 – 10 regional training days each year to encourage best practice and to increase environmental awareness amongst members. Mountaineering Ireland instigated the Helping the Hills initiative in 2012 to raise awareness of the emerging problem of upland path erosion in Ireland, and to establish a coordinated response to this issue with a focus on developing the necessary skills to sensitively repair eroded upland paths (seewww.helpingthehills.ie). Mountaineering Ireland also led the National Uplands Working Group which between 2012 and 2014 developed proposals for upland agri-environment measures under the Rural</p> <p data-bbox="208 655 1400 874">Development Programme 2014-2020. Both these initiatives benefited from involvement by NPWS staff. Mountaineering Ireland has regular contact with many NPWS managers and rangers in relation to recreation management and conservation matters. It is Mountaineering Ireland's position that Ireland's upland areas are vital natural assets which should be wisely managed for societal benefit through appropriate planning and landowner involvement in a way which ensures ecological integrity and the maintenance of these cherished natural landscapes.</p>

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	<p>2. The importance of Ireland's upland areas Within the context of the island of Ireland, mountains and upland areas are very significant elements of the landscape, providing a stable backdrop to a constantly changing urban or suburban environment. The wild or undeveloped character of Ireland's mountains and upland landscapes is a key attraction for recreational users, as well as for domestic and international visitors. The quality of the environment and the quality of the visitor's experience are inextricably linked, with undeveloped natural landscapes providing the highest quality experiences. Irelands' mountains and uplands (areas over 150m in altitude) form our largest expanses of semi-natural habitats and are of major conservation importance, with numerous habitat types listed under Annex I of the EU Habitats Directive and many rare and threatened bird and animal species being recorded in these areas. Irish upland habitats include blanket bogs, heaths, flushes and springs, semi-natural grasslands, dense bracken and areas of exposed rock and scree. Over 40% of the total land area designated as Special Areas of Conservation (SAC) in Ireland occurs in the uplands (Perrin et al, 2014).Most of Ireland's drinking water (81.9%) comes from surface water, i.e. rivers and lakes, which in turn have their origin in upland areas (DPHCLG, 2012). These small streams and rivers make up 77% of Ireland's river network, and due to a low level of dilution they are extremely susceptible to pollution (WRBD, 2007). The condition of the natural environment in the catchment around these upland streams and rivers has a direct bearing on the quality of this water and therefore also the cost to treat it. Ireland possesses 8% of the world's blanket bogs. Although most of these are protected under national and EU legislation, only 20% of this area remains in a relatively intact condition. Peatlands contain a fascinating biodiversity and they hold great value for archaeologists, but perhaps one of the strongest reasons to look after Ireland's blanket bogs is because they store millions of tonnes of carbon and have a vital function in controlling the greenhouse gases that cause climate change .Recent work by IT Sligo for the Department of Agriculture, Food &amp; the Marine (DAFM) has shown that more than two-thirds of Ireland's High Nature Value (HNV) farmland is in upland areas. However, less than 1% of the land area of the Republic of Ireland is dedicated to nature protection (as national parks and nature reserves); this is below the level of any other European country (EEA, 2015). Most of the land that has been designated for nature conservation in Ireland as part of the Natura 2000 network or Natural Heritage Areas, and the bulk of Ireland's HNV land, is in private ownership. It is important</p> <p>Mountaineering Ireland is conscious that NPWS has experienced very significant resource constraints in</p> <p>recent years, and the same time is facing ever greater challenges in protecting Ireland's natural</p>

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	<p>environment, our organisation remains committed to supporting NPWS in its work, particularly through</p> <p>the engagement of members. The relatively small area of mountain land in Ireland, especially that which remains in an undeveloped state, is a priceless national asset, valuable for biodiversity, and vital to the physical, mental, recreational, emotional and spiritual well-being of the nation as a whole. It is Mountaineering Ireland's assertion that stronger policy and greater investment are required to protect this vital resource and ensure that it is used in a sustainable way. The National Biodiversity Action Plan has a key role to play within this process. 4. Further information</p> <p>Mountaineering Ireland would be happy to elaborate on, or discuss, any of the ideas contained in this submission.</p>
	<p>We need to protect our park, landscape and wildlife for future generations and the many visitors who come here every year. The EU Commisioner made that statement nany years ago.</p> <p>The EU Birds directive should be respected in relation to works carried out during the wintering months when the Brent geese and other species come here from Canada and other colder climates. DCC were carrying out work on the seafront in Clontarf until the people held a peaceful protest. This was totally unacceptable</p> <p>A huge develooment by Crevak for the building if houses duplexes and apartments in St. Anne"s Park should never have even been considered by DCC. This was later withdrawn after the people protested. Also totally unacceptable.</p> <p>It is also totally unacceptable to grant permission to the EPA to dump in Dublin Bay.</p> <p>DCC need to clean up their act and show respect for EU Legislation. They have cost the taxpayer thousands in breaches.</p> <p>A lot is mentioned in the Development Plan and should be adhered to.</p>
	<p>Introduction</p> <p>The Heritage Council welcomes the publication of a draft National Biodiversity Action Plan (NBAP) and</p> <p>the opportunity to comment on it. The Council is committed to furthering the vision and objectives of</p> <p>the plan and to helping with specific actions as relevant. The Council has resources such as data on awareness levels with regards to biodiversity nationally that it would be delighted to make available to</p>

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	the plan co-ordinators. The Council however lacks its main resource in this area, namely an officer for natural heritage.
	These comments fall into two sections: 1) General observations on the Plan, and 2) Comments on Specific Actions and suggested additional actions. There is also a short briefing note on Heritage in Schools, Forest Schools and Children and the Outdoors at the end of the document.
	Section 1 GENERAL OBSERVATIONS ON THE PLAN
	1 Communicate the benefits of a robust National Biodiversity Action Plan
	The need for, and benefits of, robust public policy on biodiversity and management of scarce/finite environmental resources should be communicated to the general public on an ongoing basis. Links with Northern Ireland in relation to the need for some form of strategic planning on an all-island basis should also be considered, particularly in light of Brexit.
	The plan needs to succinctly recognise that this is an action plan for biodiversity in all of Ireland and make explicit at the outset the benefits (empirical and non empirical) that will arise for people, making it relevant to everyone and their sense of well being and quality of life. It must be clear that it is not confined to seeking investment only in protected areas such as SACs, SPAs National Parks or other designated areas.
	This communication is a specialist task and should be undertaken in the context of a dedicated communication plan (prepared by a specialist communication team) that relates to specific biodiversity
1	



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	Please note this document is being presented to the board of the Heritage Council in early February 2017 for discussion and formal approval.
	2
	objectives in the plan. The success of communication from initiatives such as Creative Ireland which is associated primarily with cultural heritage can act as a model for natural heritage.
	Current levels of awareness and understanding on biodiversity
	The Heritage Council undertook a substantial piece of quantitative research on public levels of awareness and understanding of biodiversity, its impact and loss in 2016. The results were compared to the EU barometer 2010 survey. While some progress has been made in public levels of awareness of the term biodiversity there is still enormous work to be done to shift people's understanding of its role and impact on their lives.
	72% of people under 25 do not feel at all or well informed about biodiversity loss
	And on average 65% of people over 25 do not feel at all or well informed about biodiversity loss. Most importantly and where resources need to be allocated is to support efforts to improve the public's understanding on what they can do to help biodiversity. In 2016 73% of the public said they did not know what to do to help improve biodiversity in Ireland while 83% believe they have a responsibility to take care of nature and 83% also believe that their quality of life and well being is based on nature and biodiversity. There is a vast well of support amongst the public to support efforts to protect biodiversity but they don't know what to do. 78% of the public have never heard of the Natura 2000 network and

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	only 7% have heard of the Network and know what it is. 46% of the Irish public have never heard of NPWS or don't know what you do.
	Very specific, targeted campaigns on particular audiences that support efforts to engage directly with
	conservation, such as those employed by the National Pollinator Plan, with clear actions outlined are
	the best way to ensure a supportive and better informed public. Negative messages on the state of our
	habitats and a focus on the loss of biodiversity without clear positive actions can create a sense of hopelessness and undermine efforts to engage the public and the aims of the NBP.
	The focus on natural heritage during National Heritage Week 2017 provides a platform to leverage
	communications for biodiversity nationally and amongst key stakeholders at reduced cost. Other
	communication options such as the International Day for Biodiversity and World Parks Day offer
	opportunities to promote the value of biodiversity to public health and well-being and the work
	being
	undertaken to support the plan. More specific opportunities around Science Week and Young
	Scientists
	Competition offer a platform to connect with younger audiences. Other areas in need of further
	focus
	and resourcing include, urban conservation programmes, citizen science programmes and the use of
	new technologies to communicate.
	2 Integration with existing and forth coming national policy and strategies
	3
	It is important that this plan is well-integrated into or influences relevant elements of national
	policy –
	· The National Landscape Strategy National Landscape Strategy 2015-20252
	and the emerging

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	National Landscape Character Assessment (NLCA), which is currently being progressed by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs and partners
	· Action Plan for Rural Development, January 2017
	· the forthcoming National Planning Framework
	· Creative Ireland, December 2016
	· Healthy Ireland – a framework for the improved health and wellbeing 2013-15
	· Ready Steady Play – children’s play policy
	· Better Outcomes, Brighter Future: the national policy framework for children and young people 2014-2020
	3. Structure of the Plan
	A clear distinction between strategic objectives and the action plan would be helpful. If it is an Action
	Plan it should be presented as such with strategic objectives referred to at the very outset and perhaps
	only in passing. It is clear that Government currently favours an “action plan” approach, with clear review and evaluation mechanisms. Support for investment in natural heritage will be more likely at a
	Government level if placed within that context. The “whole of Government approach” as currently championed by the Taoiseach and the Minister for Arts Heritage Regional Rural and Gaeltacht Affairs in
	recent cultural initiatives should be applied to natural heritage.
	The linkages between the 7 objectives could be expressed more coherently, for example Objective 1 –
	mainstreaming biodiversity into decision making across all sectors is dependent on the actions to be carried out under Objectives 2 and 3.
	Action plan There is a large number of actions under each objective. Many of the actions are related and
	impact on one another, which is to be expected in a plan for biodiversity. It would have greater impact if

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	the number of actions was to be reduced and the “ecological” relationships between them used to reduce the overall number of actions. A smaller number of more focused and prioritised actions is more
	likely to secure support and investment for their implementation.
	4 Consideration of cultural and natural heritage as part of Ireland’s biodiversity
	As mammals, humans also are part of the biodiversity of this island albeit at times disruptive and overly
	dominant. Landscapes hold evidence of human habitat, past and present and current thinking on the
	management of heritage seeks greater linkages between cultural heritage and biodiversity. A
	document from the EU Commission raised the issue of “How do we devise a more effective way of
	integrating the management of natural and cultural heritage? There is a growing awareness across
	2
	<a href="http://www.ahrrga.gov.ie/heritage/built-heritage/national-landscape-strategy/">http://www.ahrrga.gov.ie/heritage/built-heritage/national-landscape-strategy/</a>
	4
	Europe that nature and heritage management cannot be seen in isolation and need to be tackled in a
	more integrated way.”
	3
	Such inter-disciplinary issues include the value of historic places and features as ecological habitats.
	Examples include archaeological potential and sensitivity of peatland and other habitats with special preservation qualities; habitats that reflect past human uses; role of historic monuments buildings and
	areas as providing undisturbed habitats; ecological value of hedges walls and other boundaries;
	ecological value of designed landscape planting and parkland; marine archaeological remains as

Page	Comment
	artificial reefs.
	Moreover, it is equally apparent that extensive traditional farming regimes such as those promoted by
	High Nature Value Farming are also good for the maintenance of cultural landscapes. Traditional farming
	practices have been shown to be beneficial not just for biodiversity but also for the preservation of archaeological monuments, especially in upland and marginal areas, for maintaining the character of
	traditional field systems and for continuing the usage of vernacular farm buildings. Many of Ireland's
	finest historic landscapes, with the greatest concentration of heritage assets are in economically
	marginal areas, particularly uplands and semi-natural areas. A deeper appreciation of this in public policy would be beneficial.
	5 Delivering the Plan
	The plan should identify clearly structures by which the plan will be delivered; some proposals are included in this regard.
	· The establishment of a Biodiversity Unit within NPWS to drive and co-ordinate the plan. This
	unit is vital to the successful realisation of the plan, and could play an important influencing role across many sectors.
	· Key partners in delivering the vision for the plan : While organisations and sectors are namechecked
	in the actions, as most of the plan will be delivered by third parties, they deserve to be identified and their role acknowledged within the strategic section. These include inter alia (in no order of priority) local authorities, public bodies, the National Biodiversity Data Centre, the eNGOs and voluntary groups, local community groups, regional NPWS staff. All these are vital
	channels for the effective delivery of the plan, the range of actions it contains and are necessary

Page	Comment
	to ensure a cross-cutting approach to national policy delivery.
	i. Local authorities: The role of heritage officers, and of biodiversity officers and the public fora they reach and support.
	ii. Recognition of the role that regional NPWS staff play in encouraging, advising local projects – directly or through county heritage forums.
	3
	Getting cultural heritage to work for Europe: Report of the Horizon 2020 Expert Group on Cultural Heritage, EU
	Commission Directorate-General for Research and Innovation 2015
	5
	iii. Biodiversity Forum: Recognition of the Biodiversity forum in its collective and as individual members.
	iv. Role of eNGOs - for example Birdwatch, An Taisce, IWDG, IPCC, Coastwatch who carry out important awareness raising, management and research/survey works around the country.
	v. Role of local voluntary groups. Some who specialise in particular sites for example the Louth Nature Trust, Cabra wetlands but also others such as Tidy Towns groups.
	vi. National Biodiversity Data Centre In addition to its data collation and analysis, it plays an important co-ordination, communications and training role across the country.
	vii. The Heritage Council The Council has built a substantial heritage infrastructure in many parts of the country and, as articulated in the critical review of the organisation carried out by the Department, has the credibility and confidence of many in the sector as a result of its inclusive approach and the manner in which it delivers its service. The Council is in a position to secure the support of many for a new approach in the implementation of this national plan, in particular if a natural heritage and rural development officer for the Heritage Council were appointed.
	The energy and passion brought by many of these parties to protecting and enhancing Ireland's biodiversity need to be acknowledged, encouraged and conveyed through this plan.
	3 Resourcing

Page	Comment
	<p>The National Biodiversity Action Plan should be costed so that additional resources can be sought annually to advance its objectives, and existing resources should be clearly identified.</p> <p>The resourcing part of the plan should also recognise the value and effectiveness of supporting local biodiversity initiatives. Greater support, both financial and moral, is needed for the work ongoing at a local level across the country. Often this is the only means by which effective management for biodiversity can be done as it will never be possible or desirable for all management to be carried out by official means. While resourcing will always be an issue, official recognition and thanks from the official bodies, as well as multiannual support would bring this to a new level. It would contribute both to biodiversity protection/ enhancement as well as raising awareness and appreciation in the locality. Local initiatives in turn benefit from existing structures such as Local Authority Biodiversity Plans and County Heritage Forums. These initiatives are key to the realisation of Objectives 4 and 5 of the plan and should be targeted as such. The Heritage Council, supported by the DAHRRG, has invested significantly in a Grants Management System and as referred to in the previous section has secured credibility and confidence with the sector. The Heritage Council given the required additional capacity and resources will be pleased to implement a biodiversity grants programme in a manner similar to the successful Traditional Farm Buildings programme operated with the Department of Agriculture under GLAS.</p>
6	
6	Performance indicators

Page	Comment
	<p>The NPWS should consider the overall incorporation of evaluation methods in addition to simple measurement indicators. The use of qualitative evaluation such as case studies and tracking individual projects should be considered in addition to the experiential and social science approach to assessing the effective delivery of this Plan. The quality of the outcomes need to be considered. One example is</p> <p>Target 3.1.2 which requires qualitative evaluation of the outputs of these actions. Another is Action 4.6.1 where Garda understanding of the issues involved in Wildlife legislation should be examined, rather than solely quantitative measures such as the number of courses delivered.</p> <p>7 Process Of Developing The NBAP</p> <p>The Heritage Council notes the timing (draft released on 22nd December) and short time frame (1 month) for response, neither of which would be viewed as good practice in public consultation. While we acknowledge the limited resources of the NPWS, a national plan of this importance is deserving of maximum input from interested parties and provide an opportunity to highlight its value to the public.</p> <p>The consultation process used in the drafting of Culture 2025 should be considered as a model in the future</p>
	<p>the draft BAP is silent on the subject of SOIL which provides an ecosystem service of crucial importance to human wellbeing and the biodiversity of the agricultural and natural world. (I have read that in the UK context, in the absence of soil conservation measures, there may be only about 100 cropping seasons remaining on intensively cropped land.)</p>
Survey Monkey	<p>Do you have any further feedback? Yes There has to be an incentive to get Farmers on board. Yes, my contribution may be published under the name and/or organisation I indicated</p>



Page	Comment
Survey Monkey	I agree very much that biodiversity in Ireland should be conserved. Especially when it comes to the catastrophic effect that road development (and similar) have on natural areas..often reducing numbers of species able to live there to zero,as well as having detrimental effect on air and water quality. Do you have any further feedback? If you want to contact me via email you can. Thank you for caring enough to write a draft plan. Please email me a copy of my responses. I do think GCC are acting a crazy and irresponsible way with the environment and with people. If you visit any of the towns or villages in county galway you notice the amount of un occupied houses, derelict or abandoned sites etc...these towns are cut off with no decent public transport..they could be ideal for families; but who wants to be stuck in a car
	constantly because of lack of amenities, luas, jobs etc? I counted over 50 empty properties in a small town recently! We have amazing natural habitats and resources; but the bullies want to flatten them and the small minded council is agreeing to it! Yes, my contribution may be published but should be kept anonymous (without my name and/or organisation details)

Page	Comment
	<p>I would like to commend you on the way it is written. It is a pleasure to get a document that makes sense whenyou read it and provides a list of targets and actions. We could report on the number of students, teachers, schools who took part in marine biodiversity related activities through the Marine Education Programmes such as the Explorers Education Programme on a annual basis. It may fit under objective 3 or objective 5. Well done on a really great document, just please consider we are an Island Nation with a marine territory roughly ten times the size of the island of Ireland. If</p>
Survey Monkey	<p>there is any way I can help please let me know . Yes, my contribution may be published under the name and/or organisation I indicated</p>

Page	Comment
Survey Monkey	General Feedback: How do you assess the plan and it's outcomes? Yes, my contribution may be published under the name and/or organisation I indicated
Survey Monkey	i would be afraid that the government bodies involved are unable to work together from what I have witnessed myself, I feel that on the whole there will as usual not be enough people on the ground to help implement the plan, is to educate the public and carry out necessary actions such as controls invasive species in our national parks,Implement a native planting scheme for all new residential and commercial developments across the country.Yes, my contribution may be published but should be kept anonymous (without my name and/or organisation details)
Survey Monkey	Local Authorities should be compelled, through legislation, to be completely transparent. Put the plans into action with vigor. Yes, my contribution may be published under the name and/or organisation I indicated
	<p>I welcome the opportunity to contribute to the Draft Biodiversity Action Plan 2017-2021. My main concern is in regard to the recognition of upland and mountains ecosystems as separate entities within the Draft BAP. Upland and mountain areas are increasingly recognised as key components to be considered when designating areas of conservation, because such areas act as climactic regulators, are refuge for a wide variety of species, and vary in climactic and habitat conditions. The importance of upland and mountain habitats was acknowledged by their inclusion in the United Nations</p> <p>Conference on Environment and Development (Rio 1992) and included in Agenda 21, Chapter 13: Managing fragile ecosystems: sustainable mountain development. (Price 2013) Upland Habitats: Irelands' uplands (areas over 150m in altitude) form our largest expanses of semi-natural habitats and are of major conservation importance. Upland's account for almost 29% of Ireland's landmass, while almost 19% of which is considered to support upland habitats. (Perin et al,</p>

Page	Comment
Survey Monkey	<p>2009) The importance of Ireland's upland habitats to plant and animal conservation is unquestionable, with upwards of fourteen habitat types listed under Annex I of the EU Habitats Directive and many rare and threatened bird and animal species being recorded in these areas. Over 40% of the total area designated as candidate Special Areas of Conservation (cSAC) in Ireland occurs in our uplands (Perrin et al, 2009:1) Ireland's fragile mountain environment are under increasing pressure from inappropriate and unsustainable development, including recreation, erosion, drainage, agricultural improvement, extensive afforestation, uncontrolled burning and over-grazing, which has resulted in the widespread degradation of upland habitats. Non-native invasive species, wind energy development and climate change are likely to</p>
	<p>present further threats. Upland catchments: The majority of drinking water in Ireland (81.9%) originates from surface water, i.e. rivers and lakes (DECLG 2012). Small headwater streams, originating in the mountains and upland catchments, form over 77% of the river channel network in Ireland (Kavanagh et al., 2006). Their general close proximity to the source and the relatively small discharge of these 1st and 2nd category streams constitute a unique freshwater environment, there is an increasing importance of maintaining the ecological quality of streams and rivers (Feeley et al., 2012:55) We must actively work towards the conservation and protection of upland environments and mountain biodiversity specifically, in order to ensure water quality standards are maintained. We must secure upland soils and a healthy, unpolluted, water supply as a food source, for upland and lowland communities as well as for future generations. The</p>
	<p>conservation of stable, highly diverse and species rich plant communities is essential, using appropriate grazing and management regimes. I would like to recommend that uplands and mountain ecosystems be acknowledged and represented as important entities in their own right. It is vital that the National Park &amp; Wildlife Service be fully resourced in order to effectively to accomplish the aims and objectives of the National Biodiversity Plan. It is also imperative that NPWS receive the full support of all Local Authorities and elected representatives in</p>
	<p>carrying out their work. Yes, my contribution may be published under the name and/or organisation I indicated</p>

Page	Comment
	I am a sole trading Arboriculturalist in the North West. I would be willing to contribute to furthering a maintenance program within the rural agricultural and urban sector on tree/shrub biology and proper tree practices. This can be delivered through an overseeing body according to where and when it is appropriate.
Survey Monkey	This action could sit under all first 4 objectives. Yes, my contribution may be published under the name and/or organisation I indicated
Survey Monkey	A very ambitious plan. Well done to all involved. Bat Conservation Ireland would be happy to help on any point if needed. Yes, my contribution may be published under the name and/or organisation I indicated
	<p>The AranLIFE project is working with 68 farmers on the three Aran Islands since 2014 to promote the traditional farming practises which maintain and conserve the Annex I priority habitats: Orchid rich calcareous grassland (6210), Limestone pavement (8240) and Machair (21A0). The project objectives are: (1) To demonstrate best management techniques to both maintain, and bring sites to, favourable condition by addressing the threats of land abandonment, undergrazing, intensification, loss of traditional management systems and associated loss of knowledge. (2) To improve the conservation status of 1,011 hectares of priority habitats comprised of 218 hectares of Limestone pavement (8240*), 78 hectares of Orchid rich calcareous grasslands (6210*), 686 hectares of Limestone pavement (8240*)/Orchid rich calcareous grasslands (6210*) mosaic and 29 hectares of Machair (21A0*). (3) To enhance understanding, appreciation and engagement of all the key stakeholders with the conservation of priority habitats on the Aran Islands. (4) To recommend appropriate support mechanisms for farming on the Aran Islands that will address the issues that threaten the status of</p>

Page	Comment
Survey Monkey	<p>the priority habitats of the islands. The project runs until December 2017 after which an AfterLIFE plan will be implemented which has the backing of our project partners (DAHRRGA, Teagasc, DAFM, Heritage Council, Galway County Council, Failte Ireland), and will sustain the project actions in to the future and will ensure viability of island farming. In addition, the project findings will be used to devise site-specific conservation objectives that should be supported by appropriate farming practices for the designated habitats, as provided for in the Prioritised Action Framework for Ireland. This will inform future policy, monitoring, reporting and financing functions across the relevant bodies. Yes, my contribution may be published under the</p> <p>name and/or organisation I indicated</p>
	<p>We regard the plan as vitally important and agree that it should be done on a national basis (linking with international practice) with all actions integrated into the one overall plan. We believe it is important to measure and track progress of action on each goal. The plan does not make reference to financial budgets to achieve given targets - adequate funding would be needed to ensure achievement of each target. ISSA has taken responsibility for conserving domesticated fruit, vegetable and grain varieties for irish agricultural biodiversity (Since 1991). As mentioned above, we are a national association and have worked closely with the DAFM for many years on Irish Genetic Resource conservation projects. We believe we should be explicitly stated as a 'key partner' for delivery of 4.1.8: Implement the National Genetic Conservation Strategies for animals and plants: Our specific competence and responsibilities would relate to domesticated fruit, vegetable and grain varieties (and therefore would not include animals or other nondomesticated plants). The named 'Actor' is DAFM - we propose that we continue to work with DAFM to agree appropriate actions, timeframes and performance indicators. There have been problems with previous Agri-incentive schemes that could have been avoided: such as REPS, AEOS and GLAS achieving targets for conservation of genetic resources. The following is a suggestion to help eliminate such problems from future schemes: if the schemes were planned further in advance there could have been better outcomes: eg: shortages of apple trees for farmers to plant traditional orchards, caused by</p>

Page	Comment
Survey Monkey	<p>very tight deadlines (lead-time to graft and nurse fruit trees ready for planting was longer than the time allocated to farmers to purchase and plant trees for an orchard, therefore demand suddenly outstripped supply) - more advanced warning would have ensured better availability of plants to meet the requirements of the schemes. This would be the case also if there was any future initiative for vegetables or grain (lead-time to bulk-up small quantities of rare varieties could be several years to achieve large scale quantities for a national planting scheme). We highlight this, not as a negative criticism, but for input to future schemes. Otherwise commonly available commercial varieties may end-up being sown as part of 'biodiversity' initiatives - achieving some success, but failing to achieve the extra success of conserving and bulking-up more biodiversity within a crop species (for genetic resource diversity). This need not result in a monopoly of supply or favouritism for one charity/supplier - all potential suppliers could be given advance notice of an upcoming scheme and therefore propagate accordingly. Yes, my contribution may be published under the</p>
	name and/or organisation I indicated
	I am quite amazed at the careless 'blunt instrument' approach to section 3 part 8 this National Biodiversity Plan. I am writing to ask you to please consider amending
	The National Biodiversity Plan to omit the Heritage Bill. Public Consultation on Ireland's National Biodiversity Action Plan 2017-2021 Members of the Senate, multiple non governmental groups and the general public who have been informed
	of its contents have strongly urged that no extension of the hedge cutting season and upland burning be considered. As a beekeeper and somebody who also takes a particular interest in our wild bee species and insect population the fact that you are even considering this amendment is in itself very worrying and extremely depressing. The first and most obvious flaw in this Bill is the fact that no distinction is made between roadside hedging and the over 80% of normal hedgerow in this country. This flaw serves to illustrate the careless nature of the bill and the convoluted language which the bill itself is couched in, then leads the unsuspecting reader to think that careful thought and some responsible forward planning were involved in its creation, when in actual fact it fails abysmally to address our declining

Page	Comment
	<p data-bbox="208 228 1408 568">bird and insect population and even suggests measures which would further impact on these species. The Bill itself makes use of the rather appealing term National Biodiversity in its heading and yet is considering extended the hedge cutting and burning season which is something that will adversely affect our insect population primarily but also cause considerable distress and damage to breeding birds and mammals. I believe that the present significant decline in various pollinators in particular our wild bee and butterfly population (the number and variety of which is dwindling alarmingly) would be further hit by these changes. I note with some amusement that the Minister has proposed carrying out a survey after a period of two years to assess the impact of this scheme. What will be the</p> <p data-bbox="208 574 1408 687">starting reference for those engaged in this survey is just one question? In what way will this proposed survey take into account the loss of species and habitat when at present there is no nationwide study in place of our</p> <p data-bbox="208 694 1408 762">insect pollinators? Where are the conservationist officers, wildlife rangers or wardens to undertake this</p> <p data-bbox="208 810 1408 1342">lengthy nationwide task? Finally, on the subject of pilot schemes, before one even embarks on such a project, a stroll around your garden will tell you in no uncertain terms that there is an alarming absence of a multitude of insects and pollinators and because of this people in positions of power like Minister Heather Humphries have a duty to understand the issues and to realise the obligation she has to safeguard our insects, birds and mammals and to be a voice for their conservation. One does not need any kind of scientific background to understand the cost which will accrue to all of us because of our indifference to the plight of our insect population. It is questionable whether or not the All Ireland Pollinator Plan will have any significant effect on declining honey bee numbers but there is no doubting the damage which extending the burning season will have on our wild bee and insect population. In the particular case of wild bees these insects like to nest in the ground. They are therefore extremely vulnerable to upland burning and the available research on their numbers at present is alarming. More than half of Ireland's wild bee population have suffered a 50% decline in numbers since 1980. The distribution of 42 species has declined by more than 50%. At present 21 species has declined by more than 50%. At present</p>



Page	Comment
	<p>30% of Irish species are threatened with extinction. Six species are critically endangered, Ten are endangered and 14 species are vulnerable. Two species have become extinct in recent years. It is worth remembering exactly what the word extinct means. For instance in the case of Andrena Rosae this wild bee had characteristics and qualities unique to Ireland's Topography. The continued existence of a huge variety of species in this country is now in serious doubt. Our Insect population, our pollinators be they native wild bees, butterflies or any other type of insect, already under siege from the effect of climate change which is affecting the hibernation patterns and resulting in pollinators</p> <p>emerging from hibernation too early and perishing because of a lack of traditional food source and or</p> <p>damage to plants or vegetation in their vicinity, cannot make any further concessions to whatever lobby groups are behind this careless suggestion. If we are to remain true to the laudable principle outlined in The Biodiversity plan: "That biodiversity and ecosystems in Ireland are conserved and restored", then that aim carries a price and in this case the price we should be willing to play is to consider reducing the period of upland burning rather than the exact opposite suggestion outlined of increasing the burning period. Please reject part 3 section 8 of this bill and subject the remainder to some intense scrutiny. Yours Sincerely,</p>
Survey Monkey	Yes, my contribution may be published but should be
	kept anonymous (without my name and/or organisation details)
Survey Monkey	we need to maintain biodiversity in Ireland as we need our bogs for fuel as we dont have any other source of natural fuel. Leave our bogs alone we need our turf it is the only fuel we can afford.Yes, my contribution may be published under the name and/or organisation I indicated

Page	Comment
Survey Monkey	<p>I support an implementable plan. There seems to be a complete range of crucial environmental life forms missing from the plan. No, I cannot take responsibility for any actions Your Survey Monkey format is constricting, in that it seeks comments within the framework of the draft plan only and does not seem to allow for freeform feedback in any meaningful essay type field. b) There is growing and ample research, particularly in the medical field, of the importance to human health (and which must extend to flora and fauna health ) that maintaining a healthy microbiota is an essential foundation to maintaining full biodiversity. The beneficial effects of microorganisms is beginning to be understood (e.g. injection of controlled faeces bacteria to control c.difficile) . There are many examples in the research of the balance required between antibiotic usage and environmental damage. A word search reveals that the Plan does not mention the word bacteria (which is a living organism) or microbiota anywhere. Chemical manufacturers, capitalising on media hype and actual reality about antibiotic resistance bacteria, are now widely marketing bacteriacides to the general public, which are bound to have a major effect. c) In respect of a totally different topic, it is obvious that landfill of packaging material is a major problem both logistically and as a pollutant source. The vast majority of household packaging waste originates in supermarkets and retail outlets (white goods suppliers). There is no proposal in the plan to make retailers responsible for</p>
	<p>packaging reduction. The current Repac scheme allows retailers to distance themselves from their packaging choices. I am of the view that in some manner, retailers should be made directly responsible for downstream packaging disposal costs, without allowing exceptions. I believe that this would result in an extremely rapid design reduction in packaging, reducing volume and increasing biodegradable content. Yes, my contribution may be published under the name and/or organisation I indicated</p>
Survey Monkey	<p>I warmly welcome the measures proposed in this plan. I would like to see the proposed actions receive the</p>
	<p>support and funding they deserve. My final comment is on negative media reports. I would</p>
	<p>like to see NPWS equipped with a press officer who has the remit to address these crazy stories about pine</p>
	<p>marten, buzzards, bogs etc. clearly and quickly. Yes, my contribution may be published under the</p>
	<p>name and/or organisation I indicated</p>

Page	Comment
Survey Monkey	Friends of Mayo Dark Sky Park welcome the proposed actions in the Draft National Biodiversity Action Plan
	2017 – 2021 and are impressed by the comprehensive nature of the plan but are disappointed to see no
	mention of Light Pollution in relation to biodiversity. The environmental and biological impact of artificial light has been studied by scientists for decades but is still very much an unknown pollutant in our environment (database of Light Pollution research can be found here <a href="http://darksky.org/resources/research/alan-database/">http://darksky.org/resources/research/alan-database/</a> ) We believe the inclusion of the term Light Pollution in the National Biodiversity Action Plan would create awareness of this increasing threat to biodiversity to the public and government agencies such as Local Authorities and Planning departments. The impact of
	Light Pollution is not only related to threats to biodiversity but wider environmental issues such as Energy Efficiency and Climate Change which Ireland has committed to tackling.
Survey Monkey	We are concerned about our hedgerows which have been in decline for decades. Hedgerows have an ecological and environmental importance that becomes more clear with every study of farmland flora fauna and production levels. It is hard to imagine a more important resource for our biodiversity , yet it is hard to imagine a Biodiversity plan that pay them less attention. The document refers several times to Natural Capital Accounting, which does not as yet seem to include accounting for and mapping pesticide,herbicide,
	fertiliser and other nutrient inputs to agriculture and forestry, enormously important omissions. Yes, my contribution may be published under the name and/or organisation I indicated
Survey Monkey	What I would like to see is a plan identifying what exact legislation is required to implement this plan, and how such legislation could be implemented.Yes, my contribution may be published but should be
	kept anonymous (without my name and/or organisation details)
Survey Monkey	This is submission is being made on behalf of Local Authority Heritage Officers (LAHOs). Supplementary
	information will be submitted by 26th January 2017. The Local Authority Heritage Officers welcome the
	publication of the Draft National Biodiversity Action Plan 2017-2021.Yes, my contribution may be published under the name and/or organisation I indicated

Page	Comment
Survey Monkey	I applaud the plan and hope it will be respected by the government & the people of Ireland - and not
	disregarded like so many other plans. I would like to see our natural habitat actually protected
	- here on the ground, now - not a written "Plan" that is wilfully ignored, but apparently will suffice the EU.
	Please look at what is happening around the coasts of Ireland. Look at the planning applications for oyster farms, and the size of them. Come and visit, see the destruction - and the economic backlash is huge, it is
	destroying our tourism and eco-tourism industry. Look at Save Linsfort Beach Facebook Page to see the
	destruction of habitat. Yes, my contribution may be published but should be kept anonymous (without my name and/or organisation details)
	The government should be congratulated for its support and development of the country's third national
	biodiversity action plan. However, in reality the awareness, support, policy implementation and buy-in
	for related actions is poor. As such we have much to progress in relation to this plan. The details targets

Page	Comment
Survey Monkey	<p>and actions are excellent on paper. But the lack of local consultation, speed of response time, and inadequate resources to implement previous plans is of concern. The main observation to ensure the success of this third national biodiversity plan is for the need for resources across all aspects of it especially: • Training; • Local Community Support; • Policy development for all state agencies and bodies, especially in relation to agriculture and business. • Compliance monitoring. To support this plan's delivery, there should be adequate public financial expenditure made available to resource it. There is little mention in the report of the potential for action in relation to community bodies such as coastal care groups and Tidy Towns groups (except for the excellent Pollinator Award given to Community Groups via the Tidy Towns awards). As Tidy Towns is the largest community network of its type, they could also be involved in community action for many other aspects of this plan in relation to invasive species and locally important species and habitats and re-instatement of native trees and hedgerows. Many such groups already effect local actions in relation to replanting of native trees, hedgerows, invasive species actions and projects to protect fragile environments such as marram grass planting on dune systems. More local use of these communities and provision of more funding and training for them is recommended. Yes, my contribution may be published under the name and/or organisation I indicated</p>
	<p>This 3rd National Biodiversity Strategy and Action Plan (NBSAP) is a continuation of previous plans, and is a</p>

Page	Comment
Survey Monkey	<p>process that requires important consideration of the biodiversity and ecosystems in Ireland. The introduction outlines the huge value of Ireland’s biodiversity and ecosystems, not only to the existing flora and fauna it supports, but also the direct and vital effects on our economic, social, cultural and societal future. Any Action Plan needs priorities. It is concerning that while research is cited as vital to combating the impacts of climate change and implementing change within the decision making process, there is little attempt to outline priorities within that field. This dearth of information and lack of structure will not support decision makers in taking clear leadership on climate change. Under this plan it is more likely that research will be reactive rather than innovative, and unfortunately there is no mention of active research practice within the farming community itself, or funding being made available for such research. The Green Party is committed to cross party consensus in achieving sustainable and environmentally responsible governance. We are happy to support and contribute to these aims and can offer particular expertise in achieving Objectives 1 and 7, mainstream biodiversity in the decision making process across all sectors and strengthening international governance for biodiversity and ecosystem services. Yes, my contribution may be published under the name and/or organisation I indicated.</p>
Survey Monkey	<p>ILI welcomes Plan in principle and much of the content. We believe that an additional Objective be added to</p> <p>biodiversity in Urban Landscapes and related actions using Nature Based Solutions that create new habitats, thereby broadening biodiversity based in Ireland. We are preparing and will submit a detailed submission by extended deadline of Weds 25th, as agreed with A.Moore/C.O'Keeffe. Feedback below is therefore our initial response, upon which we will elaborate in detailed submission. Yes, my contribution may be published under the name and/or organisation I indicated</p>
	<p>I’m write on behalf of the Irish Landscape Institute’s Working Group on Blue-Green Infrastructure</p> <p>Further to our initial response of last Friday 20th., using the NPWS’s Survey Monkey questionnaire, I’m please to attached a summary with some more detailed comments, as our final completion.</p> <p>I trust the comments and suggestions are welcome and that ILI and NPWS can forge a mutually-beneficial</p>

Page	Comment
email	relationship, over the course of the Plan's 5 year programme. If you've any queries or need clarification on
	our submission, please contact me, at your earliest convenience Note: I will be away in Canada and USA
	between 23rd. February and 15th. March.
	I would be obliged to receive confirmation of receipt of this submission please. The ILI welcomes the Draft NBSAP in principle and see it as an opportunity to explore potential synergies between the NPWS's objectives and the work of ILI members in the fields of Landscape Design and
	Management, with particular attention to Blue-Green Infrastructure. Increasingly, landscape practice in
	B-G.I across Europe and North America is focusing on ecological design and specifically, the use of multi-
	functional Nature-based Solutions. These Solutions (e.g. constructed wetland, Sustainable Urban Drainage, new and restored riparian woodlands, 'Green Streets', water catchment management) can
	create and re-new habitats that provide refuges and expanded green networks that enhance local biodiversity and its resilience.
	1. Framing – Links to related National Initiatives
	ILI recommends that Draft NBSAP, be more explicit linked to the All-Ireland Pollinator Strategy, the National Landscape Strategy and the Biodiversity Actions Plan at local government level. This will ensure
	integration and co-ordination of actions across the full spectrum of key stakeholders – NGO's, private and
	public sectors – including State agencies (e.g Heritage Council, EPA) and semi-states (e.g. Coillte, Bord
	na Mona, E.S.B); thereby avoiding duplication of effort, and enhancing knowledge exchange.
	2. Detailed Response
	See attached appendix for an elaboration of our Survey Monkey questionnaire response.

Page	Comment
Survey Monkey	I would see this as a very positive and ambitious plan. Bat Conservation Ireland welcome the opportunity to
	assist in the success of the NBAP and wish The Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs and her department every success in this venture. Yes, my contribution may be published under the
	name and/or organisation I indicated
Survey Monkey	Yes. The main reasons for biodiversity loss in recent decades are habitat loss and increasingly climate change. Therefore we need to reduce mankind's impact on the world, to enable plants and animals to live and procreate. With climate change, we need to urgently address climate change, otherwise biodiversity will be decimated around the world in future..I wish to emphasise that, if we are to maximise
	biodiversity, we must reduce mankind's impact on the planet and to address climate change. Yes, my contribution may be published under the name and/or organisation I indicated
Survey Monkey	yes, i think it is a good plan but need to get Dept. Of Education involved at the very outset and have funding allocated to teacher training and experimental learning. The need is to get the general public to develop an
	ecoliterate world view. The big challenge is how to embed good understanding that leads to responsible behaviour throughout society. I would be delighted to form part of a working group if you choose to set one up to explore this. I have initiated a network of people and we are currently looking at how teacher training can be one that incorporates good training etc in this area. I have initiated Learning Landscapes Symposium on Iveragh Peninsula and believe a great deal can be done if approached in practical on the ground ways. Yes, my contribution may be published under the name and/or organisation I indicated
	I think that PEOPLE need to feature more in the vision statement. Could something like the following be
	incorporated perhaps? ... "That the term biodiversity is understood by all, but more importantly, that the fact that without nature we could not exist is accepted by all, resulting in a broad acceptance that we must cherish, manage and conserve what we have, and where necessary, restore or create." Vascular plant red list needs to be added on pg7. The following are some comments on format and layout. I realise this is a draft, so please take these on board if relevant/useful only. The font is not great – how about Arial, Calibri or similar. Better for readability. Layout of last plan was much nicer, with a much more userfriendly



Page	Comment
	introductory section. We want as many people as possible to read this, so the intro matters!
	Actually, in
	general it is not an appealing looking doc - admittedly the tables are hard to make exciting!, but the initial
	sections could and should look better. The last plan succeeded well in this regard, and could be used as a
	model. Another doc which I just happen to have to hand, and which is enticing to read and well-laid out is the Kew 'State of the World's Plants'. Maybe it's a bit too over-produced, but still, the current version of the Plan needs jazzing up! Also, overall, you need to employ more bullet point lists, boxes, indentation, italics, underlining, headings and sub-headings, etc. to break up the text. Especially nowadays, in an era of ppl

Page	Comment
	<p>usually only reading headline news on social media, the message needs to literally jump off the page. One needs to be able to scan down, see the key topics/points, and in that way be able to either move on, or read more in depth if it's of interest. Fig 2 on pg 5 is not useful. I already understand the concepts and it doesn't jump out at me. This needs to be clearer, more colourful, but most importantly, the take home message must jump out. Pg 12, Monitoring and Evaluating: When in 2019 is the interim review due? A month should be stated, and it should be in early 2019. Because... if there are delays, which there often are in real life, and it slips into 2010, then it's getting very late within the term of the plan. What happens if things are not being implemented? What then? There needs to be some sort of a plan for what will happen then? How do we step things up a gear? Who does this? What meetings/actions will be precipitated if certain partners are consistently not reaching goals? Have all of the agencies and bodies listed in the plan been spoken to? Will any of them be surprised to see themselves listed here? Have all actions been 'OK'd' by them? If not, how to present this...? There could be another column, allowing agencies 'currently on board' to be separated from those 'not yet on board'. (I tried to think of wording that suggested there were involved, but that wasn't too confrontational.) Psychological studies suggest that humans hate to be left out, or to be left behind. Separating out those who are not yet 'signed up', so to speak, without quite pointing a finger, might mobilise some??? Is four meetings (of the Biodiv Working Gp) over the lifetime of the previous Biodiv Plan enough? That's less than one per year. I would say that at least one per year is needed, with perhaps two in the last year of a plan, and also in the first year of a new plan (and/or in overlap/gap periods). Regrettably I have not read the doc in full, rather I have scanned it, and the notes above reflect initial and overview thoughts. I hope they are helpful, and I apologise if any are mistaken due to my not having fully read the draft. Finally - this survey monkey feedback form is a bit annoying... it would be better to have had larger boxes (I realise there has to be a cutoff, but not this small!!) so that one could see what one was entering, instead of having to move back and forth from a Word doc. If you genuinely want feedback - it</p>
Survey Monkey	<p>should be made as easy as possible! Yes, my contribution may be published but should be kept anonymous (without my name and/or organisation details)</p>

Page	Comment
Survey Monkey	The plan is comprehensive, but the objectives are only aspirational without targeted legislation and monitoring. The stated aim of strengthening legislation in support of tackling biodiversity loss in Ireland and tackling the causes and effects of Climate change would seem to contradict government policy example being not to support the fossil fuel divestment bill. Also increasing the time for hedge cutting which has the potential to decimate birds, mammals and insects who depend of this habitat. The lack of enforcement on sustainable surface drainage systems, increase in hard surfacing. Protection of urban wildlife by protecting habitat in all developments. Allowing unsustainable development by Dublin Port Company in their Redevelopment a license by the EPA to dump at sea, dredge the seabed in a protected biosphere. Increasing the extraction of turf destroying bog land which is a natural carbon sink and provides some natural protection from flooding. Meeting the targets in EU Biodiversity Strategy. Yes, my contribution may be published under the name and/or organisation I indicated
Survey Monkey	Yes, my contribution may be published under the name and/or organisation I indicated
Survey Monkey	Overall it touches on many of the threats, pressures and opportunities that are currently present. Targets and
	indicators need to be linked. How do we know if the overall target has been met? Suggest that the "target" e.g. is really an "sub-objective" and meaningful targets set relating to each indicator e.g pass/fail or Number of Biodiversity officers etc. How do you determine if the overall Objective is achieved? Very ambitious- interim monitoring reports not highlighted? How do we know how successful the Plan is halfway through its implementation? Yes, my contribution may be published but should be kept anonymous (without my name and/or organisation details)
Survey Monkey	The Botanical Society (BSBI) would like to take part in and be informed of future plans. Yes, my contribution may be published under the name and/or organisation I indicated

Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Introduction	
Page	Comment
1	Indicate the years of coverage in the title – 2017-21
1	Draft Title NEW TEXT “That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits and services essential to the natural environment and 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.”
2	Action 6.3- Beyond the scope of this document
2	NEW TEXT TITLE: Objectives and Targets of Ireland’s National Biodiveristy Strategy and Action Plan (NBSAP)
2	COMMENT IN RESPONSE TO Action 4.4: In accordance with the requirements of the EU Invasive Alien Species Regulation 1143 / 2014.
2	COMMENT IN RESPONSE TO Action 5.1 This test suggests that Ireland’s marine waters are not currently at good ecological status. Is this the case? In addition the uninitiated could confuse the term “good ecological status” for “good environmental status”. The latter has a specific meaning under MSFD. Alternative text proposed (SEE BELOW)
2	5.1 Alternative Text: Maintain and enhance the “good ecological status” of marine waters over the lifetime of this plan
2	COMMENT IN RESPONSE TO CTION 7.2:This enhanced contribution should included engagement with OSPAR Biodiversity activities and reporting against OSPAR Recommendations on listed habitats and species.
2	Action 5.1 NEW TEXT Substantial progress made towards “good ecological and environmental status” of marine waters over the lifetime of this Plan
2	Target 3.1 NEW TEXT: Enhanced appreciation of the value of biodiversity and ecosystem services among policy makers, businesses, stakeholders, local communities and the general public
2	OBJ 1 NEW TEXT: 1. To Mainstream biodiversity in the decision making process across all sectors

Page	Comment
2	Action 1.1 Comment in response to shared responsibility
2	Action 3.1 NEW TEXT: Enhanced appreciation of the value of biodiversity and ecosystem services among the general public, local communities, policy makers, and stakeholders.
2	Action 4.1 NEW TEXT: 4.1. Agricultural, rural development, forestry and peatland policies and strategies to achieve net benefits for biodiversity and ecosystem services with no loss of species or biodiversity rich habitats
2	Action 5.2 NEW TEXT 5.2. Fish stock levels maintained or restored to levels that can produce maximum sustainable yield, by 2015 where possible, and no later than 2020
2	<p>Targets 4.1 and 6.1 are key and highly challenging; and in the case of 6.1 the breadth of actions proposed are very limited and highly unlikely to achieve the target. They are limited largely to peatlands, forestry, woodlands, agricultural subsidies and birds.</p> <p>The actions must include those for decision makers (eg consenting forestry), should include protection of change of land-use without consent and the need to include targeted restoration beyond peatlands. Proposing to achieve 'no net loss of biodiversity' largely through generic agrienvironment schemes will be likely to result in no net loss of generic habitats / species and will not take account of biodiversity that is specific to an area or important from a strategic perspective.</p> <p>There is probably a need to link Targets 4.1 and 6.1 so that the 'no net loss' policy is appropriately targeted</p>
3	OBJ 6:NEW TEXTHowever, more progress is needed on this objective to ensure protection and effective conservation of these areas and the species they contain.
3	OBJ 6 NEW TEXT replace “they species ” with “species they”
3	NEW TEXT OBJ 5. Ireland’s marine environment and coastal habitats support a rich mixture of biodiversity and ecosystem services (for example, fisheries, aquaculture, and tourism).
3	NEW TEXT OBJ 6: However, more progress is needed on this objective to ensure protection and effective conservation of these areas and the species they contain.

Page	Comment
3	<p>Comment in response to OBJ 1: Personally, I would combine this table with the previous one – stating the objective and its rationale (this table) and then placing the specific targets underneath each in turn.</p> <p>If it is considered important that they stay separate, I would put this table before the other one – rationale first, then more detailed and specific targets.</p>
3	OBJ 2. NEW TEXT During the period of the second Biodiversity Action Plan there was a significant improvement in our knowledge required for the conservation of species and habitats.
3	OBJ 5. NEW TEXT However, many of these are threatened by pressures such as nutrient and chemical pollution, litter, and man-made noise.
3	OBJ 6. NEW TEXT However, more progress is needed on this objective to ensure protection and effective conservation of these areas and the species they contain.
3	NEW TEXT Objective 1. If we are to ensure conservation and, if necessary, restoration of biodiversity, then every level of government and society need to be engaged. Government Departments, agencies and Local Authorities have responsibility for policies and plans for biodiversity related issues. Decision-making across the private sector also needs to consider impacts on biodiversity and ecosystem services.
3	NEW TEXT Objective 3. Public engagement with biodiversity issues is essential for realizing the full range of benefits from nature including: strengthening local grass-roots community initiatives, increased educational opportunities, health benefits from community activities and direct exposure to nature, and realization of local business opportunities in nature based tourism and the cost and benefits of ecosystem service provision.
3	OBJ 2 NEW TEST: . However, there are still gaps in knowledge on abundance/range/ecology? that need to be filled and basic taxonomic skills are lacking for many groups.
3	OBJ5 Comment in response to aquaculture
3	OBJ5 NEW TEXT: However, many of these are under pressure from human impacts such as nutrient and chemical pollution, marine litter, overfishing, litter, man-made noise, oil/gas exploration (associated seismic activities), recreational disturbance and a lack of strategic planning.
3	Summary of Objectives Objective 6 Typo in last line

Page	Comment
3	OBJ 1 NEW TEXT:replace 'if' with 'where'; there is no doubt from Objective 4 that it is a case of 'where' not 'if'.
3	OBJ 2 NEW TEXT: a concept worth mentioning here is that of 'apprentices', as successfully piloted with some 'learned societies' with the support of UK nature conservation agencies e.g. the British Lichen Society.
3	OBJ 6 typo: and the they species theycontain.
4	LAST PARAGRAPH NEW TEXT. The continued implementation of these objectives (Figure 1) has been retained
4	1ST Paragrapg NEW TEXT "Biological diversity' means the variety of living organisms from all sources including, inter alia, terrestrial, marine and other aquatic habitats and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems. Thus, the term biodiversity includes all life on Earth. Globally, biodiversity is declining rapidly...
4	End of 1st Paragraph NEW TEXT The CBD requires each Contracting Party to develop national strategies and action plans for the conservation and sustainable use of biodiversity. At a continental scale, the European Union has established a Biodiversity Strategy and a range of important Directives which further oblige member states to enact and implement legislation for the protection of biodiversity and the management of human activities that may impact upon it.
4	2nd Paragraph NEW TEXT To achieve the Vision, seven strategic objectives were identified in the second NBSAP “
4	Introduction It might be useful to have a short résumé of previous plans, showing what had worked and what had not worked and what should have been done differently >
5	1st Paragraph NEW TEXT : The Marine habitats...
5	Last Paragraph NEW TEXT: :Recognising that biodiversity provides numerous valuable but previously unvalued ecosystem services, the economic value of which is only now being recognised, further compels us to protect our biodiversity from unsustainable exploitation.
5	1st Paragraph NEW TEXT Ireland has a rich diversity of ecosystems and wildlife in its terrestrial freshwater
5	1st Paragraph NEW TEXT: : On land, there is a wealth of species in our mountains, peatlands, turloughs, woodlands, grasslands,lakes, rivers, and coastal habitats. Grasslands – a notable omission.

Page	Comment
6	2nd Paragraph NEW TEXT : In recent decades, human impacts on biodiversity in Ireland and across the planet has accelerated and resulted in increased damage to habitats, loss of species, reduced abundance of wildlife and degradation of our environment (air, water and soils <sup>1,11</sup> ).
6	1st Paragraph NEW TEXT Marine habitats surrounding our island are home to whales, dolphins, vast colonies of seabirds, abundant fish and cold-water coral reefs as well as rich algal and invertebrate communities.
6	Comment in response to Figure 2 To follow the logical sequence through, should the benefit box also include something relating to flood protection, such as 'reduced flood damage'?
6	Comment in response to last paragraph: The treatment of international conventions, etc. seems disjointed. This paragraph is presented separately from the one on CBD. Worth combining all the material on conventions and directives in a single section? To me, this should appear near the beginning (in association with the CBD paragraph), but I accept that there may be different views on this. Having an international convention elaborated upon in a section on Ireland's biodiversity does seem out of place though.
6	2nd Paragraph NEW TEXT: In recent decades, human impacts on biodiversity in Ireland and across the planet have accelerated and resulted in increased damage to habitats, loss of species, reduced abundance of wildlife and degradation of our air, water and soils <sup>1,11</sup> . If we, the current generation and custodians of our natural world, continue to unsustainably overexploit our nation's and our planet's natural resources, damage our natural habitats, drive species to extinction and pollute our seas, freshwater and soils, future generations will inherit a diminished and degraded environment unfit to provide them with wide range of benefits to society and the economy.
6	Last Paragraph NEW TEXT :Biodiversity, ecosystem services and the economic, social, cultural and societal benefits they provide are vital to Ireland's continued economic recovery and healthy and sustainable future (Table 1).
6	Last Paragraph NEW TEXT :This NBSAP identifies key actions for sustaining and improving the condition of biodiversity, and consequently its ecosystem services, on our land and in our seas and freshwaters.



Page	Comment
6	2nd Paragraph NEW TEXT: If we, the current generation, continue to unsustainably exploit our nation's and our planet's natural resources, pollute our seas, freshwater and soils, future generations will inherit a diminished and degraded environment unfit to support them and provide them with wide range of benefits to society and the economy.
6	Paragraph 2 The risks involved in "greenwashing", i.e. promoting products or practices as being sustainable or benefitting biodiversity, in the absence of evidence, should be highlighted here. There is the potential for trying to benefit from a "green image" while simultaneously ignoring or even degrading biodiversity.
6	Paragraph 2 Need to mention parks as important resources for Irish people.
7	COMMENT IN RESPONSE TO Recreational angling in Ireland contributes €836 million to the Irish economy every year and over 11,000 Irish jobs are supported as a result of angling, often in rural communities <sup>15</sup> .
7	1st Paragraph COMMENT IN RESPONSE TO : Between 199X and 201X.
7	NEW TEXT FIGURE 4: Proportion of the Irish species assessed under the IUCN Red List process. The species are outlined by taxonomic group (number of species in brackets) and threat category.
7	Last Paragraph NEW TEXT : The most recent assessment of the status of EU protected habitats and species in Ireland in 2013 showed that 91% of the 58 habitats assessed have an unfavourable conservation status <sup>17</sup> , this is broken down as follows (50% were 'Inadequate' and 41% were 'Bad') (Figure 5)
7	2nd Paragraph NEW TEXT In recent decades, human pressure on biodiversity in Ireland and across the planet has intensified and has resulted in increased damage to habitats, loss of species, reduced abundance of wildlife and degradation of our air, water and soils
7	1st Paragraph NEW TEXT: There have been a number of assessments of the state of our biodiversity. To date, Ireland has undertaken Red List assessments of the conservation status of 4.5% (approximately 1400) of the total known species to occur on the island 16 (Figure 4). Many of these are in good status, but just under 4% (approximately 50) are now regionally extinct (for example, Mountain Ringlet butterfly and Grey Wolf) and over 20% (approximately 280) have been assessed as under threat of extinction (including 30 species of bees, European Eel, Arctic Char, and Natterjack Toad).

Page	Comment
7	Figure 4 Comment: Should this be updated with the data from the moth and vascular plant red lists?
7	6th Paragraph NEW TEXT: To date, Ireland has undertaken Red List assessments of the conservation status of 4.5% of the total known species of plants and animals to occur on the island <sup>16</sup>
7	6th Paragraph Comment in relation to Many
7	Comment in response to Figure 6
7	Figure 4 needs to be updated with the new vascular plant Red List (2016)
8	NEW TEXT FIGURE 5:2013 Habitats Directive Article 17 assessment of the status of EU protected habitats and species in Ireland showing proportion assessed as 'Bad', 'Inadequate', 'Favourable', and 'Unknown' <sup>17</sup>
8	Comment in relation to Ireland's ocean economy had a turnover of €4.2 billion in 2012 and was worth approximately 0.7% of GDP <sup>12</sup> .
8	HEADING NEW TEXT The State of Biodiversity in Ireland
8	Last Paragraph NEW TEXT The most recent assessment of the status of EU protected habitats and species in Ireland in 2013 showed that 91% of the 58 habitats assessed have unfavourable conservation status
8	We suggest to replace fig 5 with a table showing the EU habitats and species and their status (similar to table 2 and 3 on page 136 and 142 of The Status of EU Protected Habitats and Species in Ireland 2013 report). This gives a much clearer overview of which habitats and species require most attention in this national plan.
8	The State of Ireland's Biodiversity. How does this data compare with previous decades and see comment above.
8	Figures 5 and 6 Check page layout
9	NEW TEXT FIGURE 6: Birds Directive Article 12 report on the status and trends of Ireland's bird species showing proportion of taxa reported as having decreasing, stable, fluctuating, increasing or unknown population trends.

Page	Comment
9	NEW TEXT TO REPLACE FIRST PARAGRAPH: Alternative Text: The economic value for elements of Irelands biodiversity and ecosystem services are known, as outlined in Table 1. However biodiversity and ecosystem services continue to be under considerable pressure.The main threats and pressures on EU protected habitats and species are seen as agriculture, fisheries, natural system modifications (including drainage), climate change, pollution, invasive and problematic species <sup>17</sup> . In addition urbanisation, industrialisation, and ocean acidification <sup>18</sup> contribute further to the pressure and stress to species and habitats.
9	2nd Paragraph NEW TEXT: Without significant action to change current trends there will be no significant decrease in these pressures over the next decade.Indeed several pressures, including climate change and agricultural system changes and invasive species, are likely to increase if action is not taken now. Globally, over 65% of the world’s surface ecosystems have been degraded beyond safe planetary limits <sup>3</sup> ; particularly in grassland ecosystems, which are important economically, socially and ecologically. The main threats and pressures reported for EU protected habitats and species as outlined above are also likely to be the major pressures on species and habitats in the wider natural, urban and marine environments
9	3rd Paragraph NEW TEXT : Ecologically unsuitable grazing regimes represent approximately 50% of the pressures recorded in the “agriculture” category in Ireland’s 2013 Habitats Directive Article 17 report <sup>17</sup>
9	COMMENT IN REPSONSE TO .One-third of the pressures in the “agriculture” category were assigned to abandonment 17
9	1st Paragraph Comment in response to The overall picture is that a large proportion of Ireland’s biodiversity is in a poor and vulnerable state
9	2nd Paragraph NEW TEXT :The main threats and pressures on EU protected habitats and species are from agriculture and fisheries, afforestation, natural system modifications (including drainage),

Page	Comment
9	4th Paragraph NEW TEXT: In addition, the breeding distributions of bird species that are associated with farmland, including the Curlew, Lapwing and Yellowhammer has declined substantially over recent decades with Curlew on the brink of extinction according to survey work 2015 and 2016.
9	Pressures on Ireland's Biodiversity and Ecosystem Services 3rd paragraph Typos; missing comma in first sentence after 'species'. Last line – should read 'have declined' and not 'has declined'
9	3rd Paragraph: note the active removal of limestone pavement for agricultural reclamation still ongoing on non-SAC land in the Burren.
9	6th Paragraph: Cotoneaster spp are of concern in the Burren where they can be observed, e.g. on Abbey Hill overgrowing internationally renowned Arctic-Alpine vegetation; these species are poised to expand exponentially to the detriment of the world-renowned flora.
10	COMMENT IN RESPONSE TO: Ireland's Environment – An Assessment 2016 <sup>25</sup> reports that there has been no improvement in river water quality or transitional and coastal water quality over the past six years. Pollution was the most frequent threat to species of EU interest <sup>17</sup> and is therefore a key pressure that needs to be urgently addressed.
10	COMMENT IN RESPONSE TO: To date, the majority of invasive species in Ireland have been plants (including Hottentot Fig, Giant Rhubarb, and Giant Hogweed)
10	Comment in response to Globally, over 65% of the world's surface ecosystems have been degraded beyond safe planetary limits <sup>3</sup> ; particularly in grassland ecosystems, which are important economically, socially and ecologically
10	3rd Paragraph NEW TEXT : To date, the majority of invasive species in Ireland have been plants (including Hottentot Fig, Giant Rhubarb, and Giant Hogweed) but the future trend may be towards invertebrates and vertebrate species comprising a greater percentage of new arrivals. Recent sightings of Coypu in the south of the country is a case in point.
10	Last Paragraph Comment in response to . Key achievements for the period of the second Plan include:

Page	Comment
11	COMMENT IN RESPONSE TO FIGURE 7: Include the numbers or percentage of actions in each of the categories for clarity
11	2nd Paragraph NEW TEXT The occurrence and spread of invasive and non-native species in Ireland is increasing for all environments 28 . Invasive species, such as the Zebra Mussel, Grey Squirrel and Pacific Oyster,
11	2nd Paragraph Comment in response to €202,894,406 30
11	Comment in response to . An interim review of the second Plan showed that while some significant progress has been made, there are still areas where increased efforts will be required to meet its targets and objectives <sup>32</sup> . The review concluded that of the 102 Actions, 24 were implemented, 67 were on-going and 11 required substantial further action (Figure 7). Forty of the 102 actions are of an on-going or open-ended nature.
11	Last Paragraph NEW TEXT: 'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits and services essential to the natural environment and 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'.
11	Paragraph 3 Have the reasons for not fully implementing actions of the 2nd NBAP been assessed? Such an assessment is necessary to ensure that the actions of the 3rd NBAP are not implemented for the same reasons
12	1st Paragraph NEW TEXT : While Government Departments and state agencies will undertake the majority of the actions in this Plan greater engagement with industry and civil society will be necessary.
12	Comment in response to Figure 8: To make this graphic more informative, could put the years of coverage under each plan.
12	Comment in response to The starting point for the development of the third Plan was the interim review of the second Plan <sup>32</sup>
12	Last Paragraph Comment in response to: The Biodiversity Working Group and the Biodiversity Forum are the main vehicles for implementing and monitoring this Plan and for delivering an interim review in 2019 .

Page	Comment
12	Monitoring an evaluating the implementation of this NBAP The success of any BAP should also be measured by the extent of involvement by individuals or organisations which do not have statutory responsibility.
13	NEW TEXT OBJ 1 Paragraph 3: A central priority of the Irish Rural Development Programme is restoring, preserving and enhancing ecosystems related to agriculture. This highlights the importance of the contribution of this sector to the protection of biodiversity through the delivery of the Green, Low-Carbon, Agri-Environment Scheme (GLAS) that provides support measures support measures in return for voluntary environmental commitments.
4 onwards	Introduction Overall a good, factual and informed summary overview of the state of Ireland's biodiversity.
5,6	NEW TEXT Last Paragraph: Biodiversity is a critically important asset and governments and the private sector must recognize its intrinsic and economic values as part of the decision-making process.

Draft National Biodiversity Action Plan 2017 - 2017 Public Consultation Submissions	
Objective 1	
Page	Comment
13	OBJ 1 NEW TEXT: This highlights the importance of the contribution of this sector to the protection of biodiversity through the delivery of the Green, Low-Carbon, Agri-Environment Scheme (GLAS) and the GLAS+ scheme that provides additional reward in return for exceptional environmental commitment. replace a negative implication with a positive word.

Page	Comment
13	<p>Objective 1 - Mainstreaming biodiversity into decision-making across all sectors</p> <p>Local Biodiversity Action Plans need to inform practice, especially within local authorities. For example</p> <p>18 months ago Waterford City &amp; County Council funded a community group to develop a trail in an SAC</p> <p>without any environmental assessment, resulting in a 4 – 5 metre wide roadway being bull-dozed for 3</p> <p>kilometres along a scenic valley in the Comeragh Mountains. Despite this being reported by Mountaineering Ireland to the local authority, NPWS, Inland Fisheries, An Bord Pleanála and the European Commission the matter remains unresolved.</p> <p>3</p> <p>In another recent situation a non-designated wetland classified as being of national importance through</p> <p>the Wicklow Wetland Survey (2012) was subsequently destroyed by Coillte afforestation, despite the</p> <p>local authority being consulted by the Forest Service when the application was received. In addition to</p> <p>suggesting a need for greater biodiversity awareness this also indicates a need for better sharing of datasets.</p> <p>Mountaineering Ireland welcomes the commitment to develop legislation to underpin Ireland's national</p> <p>parks (action 1.2.2), and asks to be consulted when this legislation is being drafted. Furthermore, Mountaineering Ireland wishes to highlight the requirement to develop up-to-date management plans</p> <p>for Ireland's six national parks.</p>



Page	Comment
13	Objective 1: Mainstream biodiversity into decision-making across all sectors, para 3: ... This highlights the importance of the contribution of this sector to the protection of biodiversity through the delivery of the Green, Low-Carbon, Agri-Environment Scheme (GLAS) and the GLAS+ scheme that provides additional compensation reward in return for exceptional environmental commitment. – replace a negative implication with a positive word. I think it is important that they have highlighted this language use.
14	1st Paragraph Comment in response to: biodiversity-related guidance
14	2nd Paragraph NEW TEXT: A 2012 review
14	3rd Paragraph Comment in response to Under the EU Nature Directives Ireland must contribute to Natura 2000network
14	3rd Paragraph NEW TEXT after 1st line:Obligations under the Nature Directives include achieving, restoring and/or maintain favourable conservation status for protected habitats andspecies.
14	Paragraph 1 States:"To support locally-led action to safeguard biodiversity and ecosystem services additional biodiversity-related guidance for Local Authorities will be published". This will need to be held to account and how will this be done?
15	With respect to Target 1.1 action 1.1.1 The phrase of ‘moving towards’ no net loss and withn the indicator the phrase of ‘articulating’ no net loss are weak phrases and need strengthening. I suggest that there be indicators that inter alia include that all previously issued sectoral and agency BAPs be amended to reflect the target of no net loss or have anupdating memorandum to that affect, issued within a specific short timeframe less than the lifetime of the NBSAP

Page	Comment
15	<p>1.1.1 Is this an action or an aspiration?</p> <p>please remove appropriate off setting from this action point. Off setting can have major consequences for nature conservation in Ireland and will have to be explored first in terms of planning legislation, nature conservation legislation, financial legislation and in practical terms as set out in action 2.1.24</p> <p>The action and performance indicator of no net loss in plans and policies is not realistic. Anywhere where development will take place as a result of a County Development plan e.g. farmland with declining species is replaced by a housing estate with more generic species. In terms of numbers of species it might not matter, but the type of species involved is likely to contribute to another loss of habitat for species already under pressure. So an increase in general and abundant species will cancel out the loss of rarer species. Furthermore, this action may also have major consequences on infrastructure development as no net loss will mean that low value habitats such as amenity grassland, intensively managed grazing land etc will have to be compensated for too in order to achieve a no net loss of biodiversity.</p>

Page	Comment
	<p>1.1.1. All public authorities and private sector move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in green-blue infrastructure</p> <p>There are no related actions identified for this point. As the performance indicator is “1. Number of Departments /Agencies articulating a no net loss target in plans and policies” then there should be an action where the number of Departments /Agencies articulating a no net loss target in plans and policies is measured. Questions to be addressed here are; how the need to a no net loss target in plans and policies will be communicated and, if Departments /Agencies want to biodiversity proof their plans and policies, how they will be supported.</p> <p>In the previous Draft NBAP released to the Biodiversity Forum in July point 1.1.1 stated; “All government departments and agencies to commit to no net loss of biodiversity through strategies and planning, mitigation measures, offsetting and/or investment in green-blue infrastructure.”</p> <p>While the new measure has been improved upon the action in that the list of Actors/ Key partners has been expanded to include private sector it is weaker in that it does not call on all “All government departments and agencies to commit to no net loss of biodiversity through strategies and planning, mitigation measures, offsetting and/or investment in green-blue infrastructure.” The obligation to move towards no net loss is stronger than simply calling for a commitment to no net loss. However, this obligation is not time-constrained here, The EU is committed to halting the loss of biodiversity and the degradation of ecosystem services by 2020. This EU action calls for the development of a methodology to assess the impact of EU funds on biodiversity and foresees that the Commission proposes "an initiative to ensure there is no net loss of ecosystems and their services (e.g. through compensation or offsetting schemes)." Therefore, the commitment has already been made by the Ireland and accordingly, government Department and Agencies. Identifying how this commitment can be implemented and implementing it must be the Action. Without a mechanism to ensure that this commitment is taken seriously however it may just lose its efficacy.</p> <p>Through An Taisce’s experience of the planning system we are aware that in the time-frame between a development or piece of infrastructure entering the planning system and a decision</p>
15	15 onwards Pagination Target headers on table not always repeated across relevant pages (eg. 16-20 vs 21-23)
15	Action 1.1.1 Comment Baseline: EPA

Page	Comment
15	Action 1.1.1 Comment Baseline: Our Sustainable future
15	Action 1.1.1 Comment Performance Indicators: loss target in plans and policies
15	Action 1.1.1: No net loss target: what is the baseline monitored against? - from when, current status or historical given the depleted status of biodiversity in Ireland.
15	<p>Target 1.1 A further action under this Target is suggested as follows:</p> <p>"Local Authorities to seek to integrate an ecological assessment element to all planning applications ie not just those which are above threshold or require AA".</p> <p>At present there is an ecological gap whereby planning applications for small developments may involve hedgerow removal, demolition of buildings, drainage of a wetland, but account of these piecemeal but cumulatively significant ecological impacts is not required. In some cases where a screening assessment is completed, the development may not impact on the SAC or SPA, but may have other impacts of local biodiversity importance. At present there is no channel to report on these impacts.</p>

Page	Comment
	<p>Target 1.1 CONTEXT</p> <p>The EU 2020 Biodiversity Strategy introduces the goal of „no net loss of biodiversity and ecosystem services“ (NNL). Biodiversity offsets have an important potential role to play in delivering the NNL objective of the EU Biodiversity Strategy by requiring measurable compensation for residual losses of biodiversity, following a mitigation hierarchy. NNL is not explicitly stated in EU legislation but it is implicit in a number of Directives (Birds Directive, Habitats Directive, Environmental Impact Assessment Directive and Strategic Environmental Assessment Directive), while several EU laws also require compensation and remediation of damages to biodiversity (Environmental Liability Directive<sup>1</sup>).</p> <p>This can be achieved by:</p> <ul style="list-style-type: none"> <li>-Compensation: that involves general recompense for loss, and can involve a range of different measures (e.g. payments or conservation actions). Compensation does not necessarily achieve, or seek to achieve NNL.</li> </ul> <p>5.1.2. IRSG RESPONSE ( THIS INDEX REFERENCE IS IN THE INTRODUCTION SECTION OF THIS SPREADSHEET)</p> <p>The wording “articulating” is entirely non-committal language and eludes any actual implementation at the Departmental level. It is therefore not possible to measure how well the Department and public authorities have “articulated” NNL. There is a considerable difference between promotion and application.</p> <p>The IRSG request that the wording in Target 1.1.1 is evolved to the intended application of NNL within the Department and public authorities:</p>
15	provision of best practice guidance for Local Authorities on NNL.
15	Target 1.1 NEW TEXT Shared and collective responsibility for the conservation of biodiversity and the sustainable use of its components is fully recognised, and acted upon, by all sectors

Page	Comment
16	<p>Target 1.1.3 1.1.3.</p> <p>Why just the Heritage Council. Should be explicitly stated that a % increase in the number of full time Conservation and Scientific Staff in DAHRRGA “Strengthen” how do you measure strength? No target set for recruitment.CONTEXT</p> <p>Since 2011, the budget for the National Parks &amp; Wildlife Service has been slashed by almost 70%. There is now only &lt;50% geographical coverage of Conservation Rangers. This means that the vast majority of the Natura 2000 network is not currently under statutory staffed supervision. Quite simply the Government cannot service the needs of implementing the Birds and Habitats Directives on 30% of its previous 2011 budget and meanwhile also address the outstanding issues and requirements of the DirectorateGeneral for the Environment. It is a concern that the NBSAP stipulates Biodiversity Officers in all Local Authorities, however would not stipulate the roles of positions within its own Department when it currently is critically under staffed and under resourced.</p> <p>5.2.2. IRSG RESPONSE</p> <p>As per previous response, the performance indicator is not prescribed in a measurable form. How is “strength” measured?</p> <p>Ireland needs a stronger NPWS and Target 1.1.3 is entirely minimalistic when confined to the Heritage Council. At the very minimum the NBSAP should provide for Performance Indicators that equate to a fully functioning Department equipped to implement and deliver the NBSAP, notably:</p> <ul style="list-style-type: none"> <li>☐ Full geographical coverage of Conservation Rangers (i.e. performance indicator should specifically state the required % increase in staff to achieve this target);</li> <li>☐ Significant expansion of the NPWS Birds Unit and substantial increase in financial supports for research and salaried personnel including several new Regional Ecologist positions. This should aim to be proportionate to the resource allocation as deemed adequate by similar EU Member States for the management, monitoring and protection required by the Birds and Habitats Directive (i.e. performance indicators should specifically state the required % increase in staff to achieve this</li> </ul>

Page	Comment
16	<p>1.1.2 The first performance indicator is not measurable and should be rephrased or removed.</p> <p>Under action 1.1.5 it states that guidance for local Authorities will be developed regarding biodiversity. It is suggested that guidelines be developed to provide an overview of what biodiversity policy elements should be present in County Development Plan and Local Area plans for example, because this is not clear from this action.</p>

Page	Comment
16	<p>1.1.2. Public and Private Sector relevant policies and decisions explicitly consider implications for biodiversity and engage with this NBSAP</p> <p>We have noted that point 1.1.2 was originally “Support development of national Natural Capital accounting”, which has been moved to 1.1.9. and changed to “Produce guidelines for natural capital accounting and reporting for government and industry in Ireland including for those companies that will need to comply with the EU Non-Financial Reporting Directive.”</p> <p>Please see our comments relating to this point in 1.1.9 below.</p> <p>The performance indicators in 1.1.2 are very positive:</p> <p>Performance indicator: 1. New policies and plans explicitly state considerations of biodiversity</p> <p>2. Number of policies and plans that take biodiversity into account (or fail to do so)</p> <p>Having to state consideration of biodiversity may result in documents filled with baseless statements</p> <p>/ standard paragraphs about the importance of biodiversity. Having to consider biodiversity will be positive in its own right, but ideally there needs to be a mechanism that ensures that policies are aligned with the No Net Loss objective.</p> <p>It is important that the relevant actors in the Public and Private Sector who do not have an ecological or environmental law background are supported, to understand the biodiversity impacts and obligations of relevant policies and decisions and have the necessary support to make policies and decisions not only biodiversity neutral but enhance biodiversity.</p> <p>If there is no legal obligation to consider biodiversity impacts, then encouraging their consideration is a positive first step. Encouraging reference to biodiversity and the environment however runs the risk of an increase in “green-washing” whereby lip service is paid to the environment but little effort is made to have a tangible positive impact.</p> <p>Where there is a legal obligation to consider environmental impacts, for example, under the Strategic Environmental Assessment (SEA), more could be done to ensure that negative impacts are not occurring.</p> <p>Under the heading Baseline, the NBAP states “SEA Directive should ensure that policies are “biodiversity proofed.” What mechanisms exist to ensure that this is the case? What proof exists</p>



Page	Comment
16	<p>1.1.3 This action is far too vague and should be more specific. It is unclear to us as biodiversity officers what we would have to put in our Local Biodiversity Plan to achieve this action.</p> <p>It is strongly recommended that an action be included that states that each Local Authority shall appoint a Biodiversity officer. The current performance indicator is the number of Biodiversity Officers in all local authorities. This number has been the same for the last decade, so what will be the incentive in this plan to increase the number of biodiversity officers? It is clear from the lack of progress with updating and implementing the local biodiversity plans, that the heritage officers do not have the time and the financial resources to deal with the implementation of the local biodiversity plans. This point is clearly made in 1.1.4 where there are only 6 up to date biodiversity plans. Biodiversity officers in local authorities are best placed to provide advice, community engagement, undertake site management, liaise with landowners and raise awareness etc at local level (such as envisaged in 3.1.1, 3.1.2, 3.1.11 and 5.1.3).</p> <p>The second performance indicator can not be measured.</p> <p>Under actors and key partners Public Authorities are listed as the key actor, but which organisation is the key driver behind this. One organisation should be identified that will coordinate this action and ensure its implementation.</p>

Page	Comment
16	<p>1.1.3. Strengthen ecological expertise in public authorities</p> <p>This action appeared stronger in the previous draft in that it specified the action referred to government Departments, agencies and Local Authorities - “1.1.4 Strengthen ecological expertise in government Departments, agencies and Local Authorities.” Consider re-wording but it’s not a major sticking point.</p> <p>We support this action and as was stated in our previous submission, integrating sound ecological expertise into government departments would be hugely beneficial. It is evident that ecological expertise is lacking in many Departments and that many key national strategies only consider impacts on biodiversity as an afterthought.</p> <p>In the July draft “Biodiversity training material for Government Officials” was identified as a midterm target. In our view, this should be reinstated as a target, although we acknowledge the difficulty in altering people’s worldviews with information packs alone. Ideally, improved structures should be developed to include NPWS input at an early stage in policy development. NPWS should have the right to be able to biodiversity proof plans/policies.</p> <p>This action has no related action in the current draft.</p> <p>Actors / Key partners are identified as “Public authorities, The Heritage Council.”</p> <p>An Bord Pleanala could be included in this action. There are currently nine members on the board. While some of the members of the board have an environmental science background I am not aware of any of them having a strong ecological background. One action could be that at least one of the members of the board moving forward should have an ecological background to ensure that negative impacts on biodiversity are consider at appeal stage. Many appeals and high court actions are taken on Habitats and Birds Directive grounds. It would therefore make sense that biodiversity concerns are well represented on the board.</p> <p>We support the performance indicators for this action.</p> <ol style="list-style-type: none"> <li>1. Number of full-time biodiversity officers in place in all Local Authorities</li> <li>2. Training of Public authority staff with responsibility for biodiversity issues to further develop their skills and expertise</li> </ol>
16	Action 1.1.2 Baseline NEW TEXT: Teagasc has a Biodiversity Working Group to promote Biodiversity within Teagasc and effect biodiversity practice change
16	Action 1.1.2 Comment Baseline: NESC

Page	Comment
16	Action 1.1.2 Comment Baseline: Non-Financial Reporting Directive coming into force in 2017
16	Action 1.1.2 Comment Baseline: SEA Directive should ensure that policies are “biodiversity proofed”
16	Action 1.1.2 Comment in relation to Action
16	Action 1.1.2 Comment Performance Indicators 1.
16	Action 1.1.3 Baseline- NEW TEXT: DAFM has a Nitrates, Biodiversity & Engineering Division, Forest Service also has ecological expertise
16	Action 1.1.3 Comment Baseline: Engineering
16	Action 1.1.3 NEW TEXT: Strengthen ecological expertise in public authorities by appointing a biodiversity officer to each local authority i.e. an additional 22 biodiversity officers – the 3rd BAP offers a key opportunity to establish this aspiration.
16	Action 1.1.3 Observation: the Data Centre can contribute to this action assuming a ‘business as usual’ scenario for delivery of the Data Centre’s work programme 2018-22.
16	Action 1.1.3 Performance Indicators NEW POINT. 3. Explicit and direct involvement of professional and academic ecologists to support policy development, implementation and monitoring within relevant public authorities
16	Action 1.1.3: Only 5 biodiversity officers currently employed by LAs. A goal to grow this, and support to Heritage Officers to enable them to carry out further training in LAs is needed – both financial and strategic Follow up work is needed here too – such as a fund for local authority initiatives. This plan should include greater ambition to increase the number of biodiversity officers and to assist local authorities in revising their plans (viz action 1.1.3 and 1.1.4)
16	Action 1.1.3: This action should be expanded to include reinstating the Natural Heritage officer position at the Heritage Council. An additional action along these lines should be a review of the capacity and structures of NPWS to fulfil their remit. Additional resources must be committed to improve them if the review finds deficiencies

Page	Comment
16	<p>Target 1.1: Action 1.1.3 Strengthen ecological expertise in public authorities</p> <p>This action is welcome and badly needed. Lack of ecological expertise is a critical barrier to conserving and enhancing biodiversity. The equivalent action in the 2nd NBAP was notably not achieved. It is considered that every local authority to have a biodiversity officer or share one if they cannot justify the cost of one per local authority. Biodiversity Officers are very important. However the lack of ecological expertise, with a clear role alongside engineers in planning and development remains a weakness in the Local Authority system. There is room for both Biodiversity officers and ecologists in Local Authorities (unless the BO is a qualified ecologist). Until ecology is viewed as a professional requirement within Local Authorities, alongside other professions such as engineers and planners it will remain challenging to ensure that ecology is fully and appropriately considered within the planning process.</p> <p>While it is welcome to train staff in Local Authorities in Biodiversity, it is equally important to ensure that ecology is not seen as something that all staff can become trained in. (This is happening for example with regard to Screening and Appropriate Assessment, where Local Authority staff are expected to undertake assessments which require ecological expertise).</p>
16	<p>With respect to target 1.1 action 1.1.2. The action does not refer to previously mentioned outstanding biodiversity action plans. The action is not specific enough. Preferably the indicator should mention sectoral and agency action plans and biodiversity retention targets (see point 2 c above)</p>
17	<p>1.1.15 It is recommended that this action be removed from the plan as this would suggest that no thought has been given by DAH on how these actions are to be achieved and how this plan is to be implemented. This would seriously compromise the credibility of this plan, the way it was prepared and the overall capability by DAH and the partner agencies to deliver and implement it.</p>

Page	Comment
17	<p>1.1.4 We recommend that this action should be split in two:</p> <ul style="list-style-type: none"> <li>· Local Authorities will review, update and implement their Biodiversity and Heritage plans</li> <li>· Local Authorities will include policies and objectives for the protection and restoration of biodiversity in their County Development plans and other local plans and implement these.</li> </ul> <p>The PI's should be (i) Number of heritage and biodiversity plans updated and (ii) percentage of biodiversity actions implemented in those plans and (iii) Number of explicit policies and objectives for biodiversity and ecosystem services in County Development Plans and other local plans per local authority</p>

Page	Comment
17	<p>1.1.4. Local Authorities will review and update their Biodiversity and Heritage Action Plans as well as their Development Plans and policies giving due consideration to the protection and restoration of biodiversity.</p> <p>This action is linked to action “1.1.8 Local Authorities should review and update Action Plans for safeguarding biodiversity” in the July draft.</p> <p>In general, this action is much weaker than the action in the previous draft, “1.19 All local government development plans should include proactive measures for the protection and restoration of biodiversity”.</p> <p>Local authorities should be supported by the relevant public authorities to do this. The related action could then be linked to actions 1.1.3 and 1.1.5 for example. Additionally, a dedicated Biodiversity Fund for implementing LBAPs should be established and/or reinstated. This national funding source is essential and should be similar to the funding mechanism for Heritage Plans.</p> <p>Development plans should be aligned with the relevant EU and Irish Environmental legislation the Habitats Directive, Birds Directive and Wildlife Act. Attention should be paid to EU case and Irish case law. The need to protect species and habitats outside of designated sites should be given special consideration. The NPWS should support these separate points through separate actions related to guidance and capacity building. Local authorities should be up to date with the NPWS Priority Action Framework and the need to address declines in habitats and species which are most pressing.</p> <p>There should also be greater alignment between local and national levels of government as LBAPs and their outcomes complement Ireland’s NBP and its objectives. The linkages between national policy makers such as those in the DAHG and NPWS and implementing agencies such as local authorities needs to be improved .</p> <p>Ideally every Local Authority should identify the most important areas for biodiversity and developed linkages via protected habitat corridors and stepping stones. LBAPs should contain more specific, clearly defined actions, be time-specific, with outcomes that are measurable to a certain degree, and perhaps contain a baseline against which progress will be monitored. LBAPs should</p>

Page	Comment
17	<p>1.1.5. In consultation with Local Authorities, continue to publish guidance for Local Authorities regarding biodiversity</p> <p>This is a positive action and should help to support other actions as well as improving the implementation of biodiversity-relevant laws.</p> <p>This is strongly linked to the need to deliver action 1.1.1. “1.1.1. All public authorities and private sector move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in green-blue infrastructure.”</p> <p>Please, refer to points made under 1.1.1 above. There is a need for guidance on the need to consider indirect and cumulative impacts on biodiversity. This is especially the case in Natura 2000 sites where habitats and/or species already have unfavourable conservation status and are likely to be negatively impacted by a development. It would be worthwhile collating examples of best practice mitigation measures from across the EU.</p> <p>Guidance is also needed on the protection of non-designated habitats, wildlife corridors and stepping stone habitats.</p>

Page	Comment
	<p>1.1.6. Integrate Natura 2000 and Biodiversity financial expenditure tracking into Operational Programmes internal paying agency management procedures including linkage to the Prioritised Action Framework<sup>46</sup> and this NBSAP</p> <p>This is another positive action. Funding for biodiversity has in the past mainly come from the Operational Programme through the European Agricultural Fund for Rural Development (EAFRD) via Agri-Environmental schemes. However, greater effort needs to be made to draw down funding for biodiversity from the other European Structural &amp; Investment (ESI) funding streams:</p> <p>European Regional Development Fund (ERDF);</p> <p>European Social Fund (ESF);</p> <p>Cohesion Fund (CF) [1];</p> <p>European Maritime &amp; Fisheries Fund (EMFF).</p> <p>In particular, insufficient funding is being drawn from the EMFF to restore marine ecosystems. Over fishing and the decimation of marine ecosystems is the main driver of the collapse of Ireland's fishing sector. This reality is now recognised at an EU level and efforts are being made to restore fish stocks via the CFP. Despite this, however, virtually no actions were contained in Ireland's Seafood Development Programme to restore marine biodiversity. Overfishing, in fact, was barely mentioned throughout the document. More funding needs to be leveraged from the EMFF, to support the development of initiatives, such as Marine Protected Areas.</p>
17	Action 1.1.2 NEW TEXT Public authorities, private sector
17	Action 1.1.4 Comment Performance Indicators: 2. Number of Plans reviewed
17	Action 1.1.4 Comment Performance Indicators: Explicit Consideration
17	Action 1.1.4: Same as above
17	Action 1.1.5 Comment Baseline: EPA are developing best practice guidance for use of GIS in SEA, for cumulative effects assessment and for better practice in SEA for the energy sector
17	Action 1.1.5 Comment Performance Indicators: 5. Number of guidance documents published



Page	Comment
17	Action 1.1.5: Publish guidance- Agreement on priority subject matter is needed e.g. biodiversity in landscape assessments etc
17	<p>Action 1.1.5. In consultation with Local Authorities ....</p> <p>It would be useful to know deadline dates for the guidance they mention otherwise to ensure that they are kept on target. Suggest that this could be extended to include consultation with, for example CIEEM?</p> <p>Professional ecological practitioners inputting into the planning process could suggest (through CIEEM) where guidance would be helpful e.g. minimum ecological survey/ reporting standards. In many instances currently these standards are being steered by ABP decisions rather than informed guidance from NPWS. In order to assist non-specialist planning officers in making decisions on planning applications, it would be beneficial to provide clear guidance for planning authorities.</p> <p>For example, the Northern Ireland Environment Agency have recently published a Biodiversity Checklist for planning applications, which provides step-by-step guidance on the situations in which surveys of different ecological features may be required.</p> <p>It is recommended that similar guidance is prepared by the Irish government in order to provide clarity for planning authorities and to ensure that ecological features are addressed appropriately and consistently throughout the state and that the NBAP reflects this.</p>
17	<p>Regarding Objective 1.1.4, DBBP will commit to implementing the Dublin Bay Biosphere Biodiversity Conservation and Research Strategy 2016-2020. This document provides a cohesive framework for the biodiversity conservation and research actions being undertaken, both jointly and independently, by member organisations of DBBP within the Biosphere area, including three local authorities. A draft has been prepared. A working group including NGOs and local experts participated in developing the document's action plan, which is in line with the Biodiversity Action Plans of the relevant local authorities. Public consultation has been completed and the document will be finalised and published by February 2017. Implementation is underway and will be reviewed annually by the working group. The performance indicator is the number of actions completed.</p>

Page	Comment
17	<p>With regard to action 1.1.4, SECAD is aware that financial restrictions over the past number of years have contributed to delays in many Local Authorities publishing or updating their Biodiversity Action Plans and / or Heritage Plans in addition to Development Plans and policies, we welcome this reminder to local authorities and the opportunity to contributing to the next Cork County Biodiversity Action Plan when it is published</p>
18	<p>1.1.7. Begin the integration of environmental and economic statistics using the framework of the UN System of Experimental-Ecosystem Accounting (SEEA) beginning with delivery of national forest accounts by 2018</p> <p>This is a positive action. Greater knowledge is needed about the value of ecosystem services. This will support conservation efforts. However, it is important to ensure that research will not be industry driven nor directed at supporting the ongoing expansion of unsustainable models of forestry and agriculture. Further research should not be targeted at supporting an argument that commercial forestry plantations or intensive grasslands are effective carbon sinks. Rather, research goals should be focused on investigating the negative impact that forestry on peat is having on carbon sinks and on establishing the negative impact of agricultural intensification on carbon sequestration in high carbon soils.</p>
18	<p>1.1.8. Develop valuation of water services</p> <p>This is a positive step but clear efforts should be made to communicate to the public, the costeffectiveness of reducing water pollution at source compared with paying to treat polluted water. Once people start paying for water they will have less tolerance for major polluters such as the agricultural sector.</p>

Page	Comment
18	<p>1.1.9. Produce guidelines for natural capital accounting and reporting for government and industry in Ireland including for those companies that will need to comply with the EU Non-Financial Reporting Directive</p> <p>We have noted that this point was originally “Support development of national Natural Capital accounting.” The original draft point of “Support development of national Natural Capital accounting” has been fleshed out with more specific detail giving specific commitments to “Produce guidelines for natural capital accounting and reporting for government and industry in Ireland including for those companies that will need to comply with the EU NonFinancial Reporting Directive.” These specific deliverables are a big improvement. ☑</p>
18	Action 1.1.6 Comment on Operational Programmes internal
18	Action 1.1.7 Comment on: Begin the integration of environmental and economic statistics using the framework of the UN System of Experimental-Ecosystem Accounting (SEEA) beginning with delivery of national forest accounts by 2018
18	Action 1.1.8 Comment on: Develop valuation of water services
18	Action 1.1.8 For the valuation of water services it would be beneficial to include an assessment of the importance of natural habitats (notably peatlands and undrained grasslands) for the attenuation of rainwater and prevention of flooding. The report should discuss the link between artificial drainage of peatlands / agricultural land and floods in lowland sections of watercourses – vital ecosystem services

Page	Comment
18	<p>We propose that Action 1.1.7 be rewritten as follows: Develop a Natural Capital Asset Register and national natural capital accounts by 2020, and integrate them into economic policy and decision-making at all levels. [This is in line with the 'EU Biodiversity Strategy to 2020', which in its Action 5 commits Member States to: "map and assess the state of ecosystems and their services in their national territory by 2014, assess the economic value of such services, and promote the integration of these values into accounting and reporting systems at EU and national level by 2020.]</p> <p>Performance Indicators: Natural Capital Asset Register developed; national natural capital accounts developed; Memorandum to Government progressed; natural capital integrated into economic policy</p> <p>Actors: CSO, IFNC</p>

Page	Comment
18	<p>We propose that Action 1.1.8 be rewritten as follows:</p> <p>1.1.8 Initiate this process (i.e. 1.1.9) through sectoral and small scale pilot studies, including the integration of environmental and economic statistics using the framework of the UN System of Experimental-Ecosystem Accounting (SEEA) beginning with:</p> <p>Performance Indicator a: delivery of national forest accounts by 2018 Actors: CSO, IFNC</p> <p>Performance Indicator b: delivery of water services accounts by 2018 Actors: CSO, Irish Water DHPCLG, EPA, NESC IFNC</p> <p>As it stands, the Non-Financial Reporting Directive does not require companies to report on or account for natural capital. Rather, it is a mechanism for bringing certain large Public Interest Entities up to a minimum baseline in terms of non-financial reporting.</p> <p>While we will not know the extent to which it will affect Irish organisations until it is transposed into national legislation, current estimates are that it will affect a small number of companies (around 30-40), some of whom may already meet many of these requirements through existing CSR reporting initiatives such as the Business Working Responsibly Mark, ISO 26000, the UN Global Compact or Global Reporting Index. While many of these standards do include criteria on biodiversity and ecosystem services, they do not articulate requirements for natural capital reporting or accounting.</p> <p>The Directive does require relevant organisations to provide sufficient information on each of the non-financial matters set out in the directive for “an understanding of the undertaking’s development, performance, position and impact of its activity”. This includes a non-financial statement to deliver “a description of the policies, outcomes and risks related to those matters and should be included in the management report of the undertaking concerned. The non-financial statement should also include information on the due diligence processes implemented by the undertaking, also regarding, where relevant and proportionate, its supply and subcontracting chains, in order to identify, prevent and mitigate existing and potential adverse impacts,” which could potentially include natural capital considerations. With regards to environmental reporting, the Commission’s Consultation Document states:</p> <p>Where undertakings are required to prepare a non-financial statement, that statement should</p>

Page	Comment
19	1.1.10. Establish a national Business and Biodiversity Platform under the CBD's Global Business Partnership No Comment

Page	Comment
19	<p>1.1.11. Ensure the agriculture sector produces tangible benefits for biodiversity with increased emphasis on conservation and restoration of biodiversity in Origin Green</p> <p>In the previous draft this was the point “1.1.14 Ensure that Origin Green leads to tangible biodiversity benefits”.</p> <p>It is positive that this has been expanded to include the agricultural sector. However, this should really be two separate actions. Origin Green is “a network of food companies who have committed to sustainable practices such as carbon efficiencies”. This is not representative of the whole agricultural sector.</p> <p>There should be an action which states that the “agricultural sector produces tangible benefits for biodiversity with increased emphasis on conservation and restoration of biodiversity.”</p> <p>However even this would be inadequate. Agri-environmental schemes already demonstrate tangible benefits for biodiversity, yet the agricultural sector is the leading driver of biodiversity loss nationally. The entire NBAP must in large part be judged on its ability to halt biodiversity loss being caused by agricultural intensification and agricultural pollution. Given the vast sums of money being spent on biodiversity measures in Ireland’s RDP, agri-environmental schemes should be required to demonstrate their cost effectiveness. Are they delivering on what they are supposed to and are they good value for money? On both counts the answer is probably negative apart from some notable targeted Locally Led Schemes (LLAES).</p> <p>The supporting action must be an evaluation of the success and cost effectiveness of past agrienvironmental schemes. A process must be put in place to develop mechanisms to identify the success and cost effectiveness of current schemes such as GLAS measures. The agricultural sector must be able to demonstrate that biodiversity loss is being addressed. Isolated success stories against a backdrop of mass extinction are inadequate. There needs to be accountability at the end of RDP cycles when millions have been spent and the environment is still no better off.</p> <p>Origin Green claims that biodiversity is one of the three environmental pillars on which Ireland’s</p>
19	Action 1.1.11 Comment Baseline: Origin Green’s network of food companies have committed to sustainable practices such as carbon efficiencies
19	Action 1.1.11 Comment on : tangible benefits for biodiversity

Page	Comment
19	Action 1.1.11 Comment Performance Indicators no 4.
19	Action 1.1.11 Performance Indicators NEW TEXT Origin Green reports include assessment of biodiversity impacts and benefits 2. Level of support for development of farmland habitat management plans 3.Development of a scientifically based methodology to assess farmland habitats
19	<p>Action 1.1.11 Under Performance indicators - 2. Level of support for development of farmland habitat management plans.</p> <p>Great to see this included assuming "support" means a quantifiable monetary value.</p> <p>Similar Performance Indicators should be included throughout the entire plan to identify the level of support going to biodiversity conservation. There is no biodiversity outcome measure.</p>
19	Action 1.1.11: In relation to performance indicators here we feel that there is real need for an overarching strategic plan for HNV farmland in Ireland as it encompasses the hotspots of agricultural biodiversity.
19	<p>Given the above, we propose that Action 1.1.10 be rewritten as follows:</p> <p>1.1.10. Establish a national Business and Biodiversity Platform under the CBD's Global Business Partnership 2018</p> <p>Actors: IFNC*, BITCI, Sustainable Nation</p> <p>Performance Indicators: Establishment of a national Business and Biodiversity Platform that facilitates a 'learning network' of businesses to engage with biodiversity through communications, workshops, best practice-sharing, research and guidance in Corporate Responsibility, biodiversity innovation and natural capital.</p> <p>Baseline: Existing business networks e.g.: Business in the Community Ireland's network for responsible business, which has recently produced a framework for business engagement with biodiversity (for reference, see the high-level 'Wheel' graphic, which is publicly available, below) and promoted it through workshops and advisory among its member companies;the IFNC, which works to promote natural capital to business;and Sustainable Nation, Ireland's sustainable finance community.</p> <p>* Further resourcing would be required for IFNC to fully engage with this initiative.</p>



Page	Comment
19	<p>Given the above, we propose that Action 1.1.9 be rewritten as follows:</p> <p>1.1.9: Support the integration of national capital into decision-making and accounting by Government, local authorities, and private sector (see 1.1.7 and 1.1.8)</p> <p>Performance Indicators: Guidance documents, workshops and seminars, private sector learning networks under 1.1.10.</p> <p>Baseline: International reports on natural capital accounting at the national level (e.g. The use of (economic &amp; social) values of NC/ES in national accounting, ten Brink et al, 2016), systems of natural capital accounting in the private sector (e.g. the Natural Capital Committee's Corporate Natural Capital Accounting), frameworks for integrating natural capital into private sector decision-making (e.g. the Natural Capital Protocol).</p> <p>The CBD's Global Business Partnership and its regional chapter the EU Business@Biodiversity Platform incorporate a wide range of biodiversity and natural capital-related streams. Any such initiative in Ireland should promote that same breadth of issues along a continuum for action, from entry-level engagement through Corporate Responsibility and sustainability initiatives through to natural capital accounting.</p> <p>Business in the Community Ireland is the network for responsible business. Its membership includes around 80 of the country's largest multinationals, semi-states and indigenous companies such as Intel, Accenture, Bank of Ireland, AIB, Glanbia, RTE, Bord na Mona and ESB, a number of whom are taking action for biodiversity by using BITC's recently-launched Framework for Business Engagement with Biodiversity (see below).</p>

Page	Comment
20	<p>1.1.12. Identify and take measures to ensure that incentives and subsidies do not contribute to biodiversity loss, and develop positive incentive measures, where necessary, to assist the conservation of biodiversity</p> <p>This should be part of the broader EU effort to develop a methodology to assess the impact of EU funds on biodiversity. A review of the CAP is needed. This is obviously beyond the power of the NBAP to achieve. Subsidies are still targeted towards production to the detriment of biodiversity, climate, water quality and small/medium farmers.</p> <p>Forestry grants and tax breaks are directly driving biodiversity loss. The new Environmental Requirements for Afforestation Guidelines (2016) have no mechanism to protect either Annex I birds species under the Birds Directive or High Nature Value farming. This needs to be urgently addressed. Land eligibility is still a huge driver of biodiversity loss.</p> <p>As well as identifying perverse incentives, positive incentives must be created. Greater effort must be made to shift away from a system where farmers are paid not to pollute to a system where pollution is regulated against and farmers are instead supported to carry out positive actions above and beyond what are delivered as a side benefit of farming.</p> <p>The supporting performance indicators mentioned in this point are positive.</p>

Page	Comment
20	<p>1.1.13. Establish and implement mechanisms for the payments of ecosystem services (PES) including carbon stocks, to generate increased revenue for biodiversity conservation and restoration</p> <p>Peatlands are the greatest terrestrial carbon sinks despite covering a mere 3% of the earth's surface.</p> <p>There is an overwhelming argument to protect Ireland's peatlands from a carbon sequestration perspective. There is a positive correlation between the distribution of high carbon soils and High Nature Value farming systems due to the associated negative correlation with agricultural intensification. Efforts to conserve biodiverse carbon sinks should focus on habitats on high carbon soils such as peatlands, wetlands, rough grasslands etc.</p> <p>An Taisce and several other eNGOs involved in the Environmental Pillar and Stop Climate Chaos published our 'Not So Green – Debunking Myths Around Irish Agriculture' report in 2016. This report highlights serious issues with the logic used to claim carbon offsetting in Irish forestry and highlights critical EU climate accounting errors, which incorrectly counts bioenergy from all biomass sources as carbon neutral. As mentioned above, there are problematic aspects associated with offsetting in general which must be considered.</p> <p>'Not So Green – Debunking Myths Around Irish Agriculture'</p> <p><a href="http://www.antaisce.org/sites/antaisce.org/files/not_so_green_report.pdf">http://www.antaisce.org/sites/antaisce.org/files/not_so_green_report.pdf</a></p>

Page	Comment
20	<p>1.1.14. Monitor the implementation of this Plan</p> <p>This action had the corresponding action “1.1.5 Biodiversity Working group to monitor implementation of this plan.”</p> <p>This action makes obvious sense. However, a target needs to be set for the number of meetings of the Biodiversity Working Group. For the 2nd Report, the Biodiversity WG met four times. This seems insufficient given that the group should meet annually, at a minimum and more often in order to carry out mid-term and ex-post reviews, including perhaps interim meetings and consultation meetings in relation to these.</p> <p>It is also vital that the 29 departments and agencies improve their representation at the meetings and that important stakeholders are encouraged to attend.</p>

Page	Comment
20	<p>1.1.15 Target around local communities</p> <p>In the July draft of the NBAP action 1.1.15 was “Target around local communities.” The importance of community level engagement cannot be overstated. A love of biodiversity must be integrated into Irish society at a grass roots level. Better education is needed, along with better consultation and engagement. Engagement may seem like an extra burden on an already stretched department but it can also ease the burden on rangers. There are numerous examples of communities being empowered to successfully manage sites for conservation both in Ireland and abroad. Ireland’s NGOs for example work closely with local communities to manage protected sites, monitor wildlife and pollution.</p> <p>LLAES are positive and Ireland is leading on this, with huge potential. However, local engagement and empowerment cannot be limited to the Locally Led Agri-Environment Schemes. Farmers are just one element of the broader community (albeit an integral part).</p> <p>Greater efforts should be made to pool the resources of those who are working at a community level on citizen science and locally led conservation. There are many community groups which are doing positive work (initiatives such as the Ballydangan and Boleybrack Red Grouse Projects and the Abbeyleix Bog Project). An Taisce have organised very successful raised bog restoration and invasive species removal projects in 2016. A lot more of this kind of work could be done.</p> <p>NPWS rangers, Heritage and Biodiversity Officers, NGOs and Local Authority Water Conservation Officers should work closely together where possible to empower and coordinate community action.</p> <p>The NPWS could better utilise the national good will towards nature conservation by involving eNGOs and local community groups (including for example Gun and Angling clubs) in hands on conservation measures and habitat management. As much of Ireland’s designated sites are in private ownership, many communities do not have the space to carry out hands-on conservation. If communities have the space, direction and the tools (either from professional conservationists or from community level enthusiasts) then great things can be achieved. Greater efforts should be made to lease Coillte and Bord na Mona lands back to local community groups.</p>

Page	Comment
	<p>1.1.15. Develop and implement a National Biodiversity Finance Plan to set out in detail how the actions and targets of this NBSAP will be delivered from 2017 and beyond</p> <p>This action is extremely necessary. Please refer to previous comment under 1.1.6 above regarding leveraging more biodiversity funding from Operational Programme.</p> <p>Ireland draws down less LIFE programme funding than many other EU member states. There are several reasons for this, including the comparative dearth of NGOs and other partners with the resources to draw down LIFE funding. These constraints should be identified and communicated at an EU level.</p> <p>Several very positive actions contained in the July draft under Target 1.2 have been deleted. An Taisce would like to see a number of them reinstated, in particular the following “1.1.7 Each Local Authority shall designate a dedicated Biodiversity Officer and provide resources to implement Biodiversity Action Plans.</p> <p>This would strongly support the actions 1.1.3 and 1.1.4 in the new draft. The previous draft had set an ambitious mid-term target of having biodiversity officers in 50% of Local Authorities. ☒</p>
20	Action 1.1.12 Comment Baseline: A perverse incentive is a policy or practice that encourages, either directly or indirectly, resource uses leading to degradation of biodiversity.
20	Action 1.1.12 Comment Performance Indicators no 1.

Page	Comment
20	Action 1.1.12 Structural frameworks and policies that act as perverse incentives should also be identified and remedied. For example, the principal objects of Coillte under the Forestry Act 1988 are commercial with no core requirement for biodiversity conservation. 2021 is a long time to address the current situation of perverse incentives that are damaging SAC habitats (most particularly damaging habitat to "make eligible land". The timeline could be considered to be contrary to the Habitats Directive and it is suggested that it is changed to 2017-2019. Many incentive schemes impact on biodiversity (eg. under GLAS, up to 750m of hedge can be coppiced). This does not allow for rotation of small linear sections and such large scale works have the potential to wipe out scarce species such as small eggar (cited as 'Near Threatened' in Macro Moths Red Data List – 2016), which rely on 2nd year growth on hawthorn and blackthorn. For real avoidance of biodiversity impact, farm advisers need to be properly trained in biodiversity (including local biodiversity targets) and need to undertake better biodiversity audits (including surveys at the right time of year). It is unclear in the baseline column of the table how or when this target is to be achieved
20	Action 1.1.12:e.g. the lack of compliance whereby farmers / contractors are grubbing out scrub / rock exposures to increase the area eligible for CAP payments.
20	Action 1.1.13 Any mechanism needs to be carefully evaluated as can lead to perverse impacts. For example windfarms on peatland sites.
20	Action 1.1.13 Under baseline here the Burren Programme needs to be mentioned as it is one of most heralded "PES" type programmes in Ireland.
20	Action 1.1.13: Actors and Key Partners: Remove DAFM-DAFM cannot necessarily commit to these payments
20	Action 1.1.14 Comment on : Monitor the implementation of this Plan
20	Action 1.1.14 Monitor the implementation of this Plan. It would be useful to see the outcome of the 4 meetings, the issues raised and actions proposed. Nothing is noted under the 'related actions' column. It is proposed that CIEEM would have a role with the BWG etc in this context.

Page	Comment
20	Action 1.1.15 Comment on Action: Develop and implement a National Biodiversity Finance Plan to set out in detail how the actions and targets of this NBSAP will be delivered from 2017 and beyond
20	Action 1.1.15 Pleased to see this included and it is absolutely essential. This is an ambitious plan which must be properly resourced to ensure delivery
20	With respect to target 1.1 action 1.1 .13. and associated indicators. It should mention that payments and rewards for taking part in mechanisms for PES should be 'evidence based'. Payment should only be made after positive results for ecosystem services have been demonstrated by the applicant. Indicators should also reference adequate audit rates to be applied and processed for PES or agri-environmental schemes.
21	<p>1.2.1 Incorporate into legislation a biodiversity duty to ensure that conservation and sustainable use of biodiversity are taken into account in all relevant plans and programmes and all new legislation</p> <p>Formerly Point 1.1.6 in July draft of NBAP "1.1.6 Include in legislation a biodiversity duty to ensure that conservation and sustainable use of biodiversity are taken into account in all relevant plans and programmes and all new legislation."</p> <p>The Biodiversity Forum had a very positive presentation from a representative from Northern Ireland on a similar piece of environmental legislation which they have. Everyone in the forum was in favour of this action and it should certainly be re-included.</p> <p>The performance indicators under the last draft were "1. Legislation drafted. 2. Law enacted and enforced." These are stronger than the current action "Enactment of Biodiversity Duty".</p> <p>A good mid-term target would be to draft legislation and consult with relevant departments such as DHPCLG, who should therefore be reinstated as a key actor/partner in the current draft. 2</p>



Page	Comment
21	1.2.2 Publish legislation to provide a legal basis for National Parks Legislation should also include an obligation to ensure that National Parks are properly resourced and managed.

Page	Comment
	<p>1.2.3. Consolidate the Wildlife Acts in a new Bill</p> <p>The consolidation of the Wildlife Acts implies that they will be strengthened. The only current work being done on the Wildlife Act, is through the Heritage Bill. The Heritage Bill proposes to significantly weaken Section 40 of the Wildlife Act and will result in clear negative impacts on upland and farmland biodiversity. The greatest threat to hedgerow biodiversity aside from removal is intensive management. Allowing hedge cutting in August will seriously impact on already critical levels of biodiversity loss in farmland species. Yellowhammer, Linnet and Greenfinch nest well into September. Yellowhammers are a Red Listed in Ireland due to a 90% decline in breeding population (11-14 year trend). The proposed legislative changes may drive some species to national extinction. The inclusion of action relating to the Heritage Bill seriously undermines the credibility of this NBAP and does a disservice to the dedication and expertise of the staff working within DAH. This action is not aligned to the fundamental objectives of this NBAP or its constituent actions. How will the negative impacts of the Heritage Bill be mitigated/offset? How will this action be reconciled with the core objectives of the NBAP and the specific obligations as set out by actions 1.1.2, 1.1.11 and 1.2.1? How will the Heritage Bill help to deliver the overarching objective of target 2? It is also of concern to An Taisce that a section of the Heritage Bill 2016 proposes to repeal a paragraph of the Wildlife Act which provides protection to authorised person or a member of the Garda Síochána exercising any power or function conferred on the authorised person or member by or under the Wildlife Acts, 1976 and 2000 from assault. Such a move would have serious implications for the safety of those enforcing environmental legislation in Ireland and undermines the government's commitment to environmental regulation and enforcement. In relation to the performance indicator "1. Review of existing legislation published", will the scientific basis and all relevant research related to the legislative changes be published?</p>
21	
21	1.2.4 COMMENT the text should be amended to reflect the new vascular plant red list.

Page	Comment
21	<p>1.2.4. Review Flora Protection Order and Schedule 5 of the Wildlife Act in light of publication of new Vascular Plant Red Data list and other regional and global Red Lists. Further review Section 40 to ensure control of invasive species may be carried out subject to screening process in the summer months</p> <p>Formerly, “1.2.3 Review Flora Protection Order in light of publication of the new Vascular Plant Red Data list (expected end 2016).”</p> <p>The inclusion of the review of Section 40 to ensure control of invasive species may be carried out subject to screening process in the summer months is welcome. In this regard, it is important to define exactly what species are considered invasive and what means of control are permissible. Defining what, when and how invasive species can be exterminated is necessary to ensure that loop holes are not created which may result in further destruction of important habitats during the closed period. For example, it is widely accepted that the road safety exemption for local authorities which currently exists for hedge cutting is abused.</p> <p>Updating the FPO list is a necessary action. FPO status should offer one of the strongest levels of protection under either Irish or EU law. In An Taisce’s experience, FPO status means very little in practice. In planning applications, FPO species are given little attention. An Taisce has had the experience of having raised concerns about FPO species in submissions on planning applications which have been ignored by inspectors reports and ABP decisions.</p> <p>In forestry applications, FPO species are not protected because foresters do not carry out detailed ecological assessments and there is no obligation to carry out ecological assessments when relevant species may be in bloom and most conspicuous.</p> <p>There is little if any enforcement against farmers carrying out intensification.</p> <p>There are to our knowledge very few mechanisms available to enforce FPO protection.</p> <p>A review of FPO protection should be carried out. NPWS rangers and staff should have practical experience of the realities of trying to enforce FPO protection and of ways in which floral protection could be improved. Guidelines should be developed and sent to relevant parties in the planning system reminding them of FPO obligations. Without some form of mapping system of FPO species distribution it is likely that these species will continue to be ignored. Placing such data in the public</p>

Page	Comment
21	<p>1.2.5. Ensure the various provisions of the Forestry Act 2014 that protect biodiversity and the wider environment are brought into effect</p> <p>This point was formerly “Ensure that the Minister brings provisions in the Forestry Act 2014 that impact on biodiversity into effect.”</p> <p>An urgent review of the Forestry Services’ past compliance with environmental legislation is needed to ensure that the Minister brings relevant biodiversity provisions into effect. This must also include the role that relevant authorities and notice parties have played in non-compliance with environmental legislation.</p> <p>Such a review could be included as a related action under this heading.</p> <p>An Taisce has raised concerns many times about the failure of the forestry service to properly carry out their obligations under Article 6(3) of the Habitats Directive through our role in the afforestation consent process, through relevant consultations, submissions and engagement with forestry related issues, such as the Hen Harrier Threat Response Plan Consultative Committee. Our concerns are summarised in the following documents:</p> <p>The Environmental Integrity of Irish forestry in the Context of the EU’s Effort Sharing Decision (2016)</p> <p><a href="http://www.antaisce.org/publications/the-environmental-integrity-of-irish-forestry-in-the-contextof-the-eu%E2%80%99s-effort-sharing">http://www.antaisce.org/publications/the-environmental-integrity-of-irish-forestry-in-the-contextof-the-eu%E2%80%99s-effort-sharing</a></p> <p>An Taisce submission - Re: Draft Environmental Requirements for Afforestation (2016)</p> <p><a href="http://www.antaisce.org/articles/an-taisce-submission-re-draft-environmental-requirements-forafforestation-2016">http://www.antaisce.org/articles/an-taisce-submission-re-draft-environmental-requirements-forafforestation-2016</a></p> <p>According to the EPA, forestry is now the greatest pressure on high status water bodies. This should be taken into consideration in light of the Minister’s obligations under the Forestry Act.</p>

Page	Comment
21	<p>Action 1.2.1</p> <p>It is considered that this legislative action should be extended to "to ensure that conservation and sustainable use of biodiversity are taken into account in all relevant plans and programmes and in all planning decisions"? The introduction provides a strong and clear context for protecting biodiversity and there is discussion regarding the need to address this at a sectoral level, however the piecemeal loss of biodiversity through small developments is significant and can often only be addressed at the planning level.</p>
21	Action 1.2.1 Comment Performane Indicators: . Enactment of biodiversity duty
21	<p>Action 1.2.4: Limestone Pavement Orders(akin to those in Section 34 of the UK'sWildlife &amp; Countryside Act 1981)would provide a basis to halt the progressive destruction of limestone pavements. English garden centres sell an estimated 8,000 tonnes per annum of'Irish water-worn rockery stone'.</p>
21	<p>Action 1.2.4.</p> <p>In respect of the "Further review Section 40 to ensure control of invasive species may be carried out subject to screening process in the summer months".</p> <p>This is crucial and needs to happen sooner rather than later. The control of most terrestrial invasive plants is dependent on systemic herbicides which, by nature, need to be controlled in the summer months. This should be linked to best practice information on mechanical control and other methods – also disposal of material.</p>
21	<p>Action 1.2.4.</p> <p>Review Flora Protection Order</p> <p>There is an urgent need for a fauna protection order.</p> <p>Suggest add an action to produce a fauna protection order. Experts have already recommended species so it should not take long to add as an amendment to the Wildlife Acts.</p>
21	<p>Action 1.2.4. Reference to Section 40 of wildlife act may need to be revised if the proposed pilot scheme changes come into effect in respect of widening the cutting/burning periods from Heritage Bill 2016</p>

Page	Comment
21	<p>End of Target 1.1: Two additional suggestions at :</p> <ul style="list-style-type: none"> <li>- Identify business biodiversity ambassadors and encourage relevant business organisations to establish appropriate offices within their organisations</li> <li>- Consider biodiversity award, akin to international Green Flag, for business, agricultural and NGO organisations</li> </ul>
21	<p>Regarding Objective 1.2.4, the review of Section 40 to ensure control of invasive species may be carried out subject to screening during the summer months is very welcome. This would facilitate work to control the non-native invasive Sea-buckthorn on dune habitats in Dublin Bay Biosphere.</p>
21	<p>Target 12 An Action point in relation to providing a legal basis for the establishment of local nature reserves would be a useful addition.</p>
21	<p>With regard to Target 1.2. The Prevention/ Containment/Eradication of invasives could be strengthened by having legislation that requires Public procurement to insist on wood packaging to ISPM No 15 standard when ordering supplies using public money.</p> <p>It could also be insisted that plants and trees and biotic material used in landscaping or amenity purposes and bought using public money be traceable from end use to supplier and on to importer using. An example might be landscaping along TII roads which can act as corridors to pests/pathogens an invasive species.</p> <p>It would also be useful for the legislation or policy that supports producers of irish pants trees and biotic material or suppliers of irish seed that does not contravene EU competition laws.</p> <p>It would also be useful to have legal responsibility on landowners to control IAS such as rhododendron, which is detrimental to woodlands and carries P ramorum disease. There already is a parallel with regard to Ragweed. Something similar for IAS should be worth pursuing as relying on public funded bodies only will not solve the problem of IAS.</p>

Page	Comment
22	<p>1.2.6. Implement OSPAR recommendations on Habitats and Species and their implementation and ensure government resources available to engage with OSPAR and ICES</p> <p>According to the baseline column of the NBAP “From a Biodiversity perspective Ireland’s engagement with OSPAR, and ICES as an advisory body to OSPAR, is insufficient at present. This hampers effective protection of biodiversity that is otherwise facilitated by international harmonisation, consensus building and agreement around appropriate action.”</p> <p>Compliance with quotas set in accordance with maximum sustainable yield under the Common Fisheries Policy (CFP) and the obligations of the Marine Strategy Framework Directive are two mechanisms whereby Ireland can support the implementation of OSPAR recommendations. Likewise, the establishment of an effective network of Marine Protected Areas with specific conservation objectives will also support our OSPAR obligations.</p> <p>In relation to specific OSPAR recommendations on Habitats and Species, a review should be carried out of all relevant actions taken to date and recommended future actions. Potential synergies will exist between obligations under the WFD, MSFD and the Habitats and Birds Directives. Government resources must be made available to engage with OSPAR and ICES, which can be justified due to multiple levels of obligation under different conventions and directives.</p> <p>There are currently no actions or mid-term targets to improve Ireland’s engagement with OSPAR and ICES.</p>
22	<p>1.2.7 This action should be prioritised for 2017 instead of 2019 as this is one of the key actions required to start tackling invasive species in Ireland.</p>
22	<p>1.2.8 It is recommended that all public authorities are given responsibilities and powers to control invasive species on public and private property not just the IFI.</p> <p>Both actions 1.2.7 and 1.2.8 should be moved under target 4.4 the invasive species section of the plan to have all invasive species actions together.</p>

Page	Comment
22	Action 1.2.6 Comment Action: Implement OSPAR recommendations on Habitats and Species and their implementation and ensure government resources available to engage with OSPAR and ICES
22	Action 1.2.6 Comment Baseline: From a Biodiversity perspective Ireland's engagement with OSPAR, and ICES as an advisory body to OSPAR, is insufficient at present. This hampers effective protection of biodiversity that is otherwise facilitated by international harmonisation, consensus building and agreement around appropriate action.
22	Action 1.2.6: RELATED ACTIONS NEW TEXT Review the OSPAR Recommendations on Species and Habitats to evaluate the extent of their implementation and assess what if any further actions are required
22	<p>Action 1.2.7</p> <p>In particular implementation of Article 19 (Management Measures) and Article 20 (Restoration of the damaged ecosystems) will require significant financial and staffing input in order to deal with the situation in Ireland. It is considered that this needs to be acknowledged at a minimum and, ideally, committed to within the NBAP.</p>
22	<p>Action 1.2.7 Publish legislation to address required provisions under the EU Regulation on invasive alien species (No. 1143/2014)....</p> <p>This issue does not just require legislation but also proper and well informed advice and education to all stakeholders involved.</p> <p>The risk assessments are a way of highlighting the risk but it is how they are managed and treated that is critical.</p> <p>This is becoming a serious issue, both in terms of halting some projects but also as to how invasives are being managed on the ground. Currently available information is confusing, especially in respect of Japanese knotweed; and the treatment of invasives is being left to a handful of contractors managed by project managers who are not necessarily aware of the implications of the spread of invasives or indeed the impact on biodiversity. ☒</p>



Page	Comment
22	Action 1.2.6: REMOVE BASELINE TEXT and replace with The effective implementation of OSPAR Recommendations on Habitats and Species will help protect biodiversity Note ICES is a scientific body that advises Governments and international commissions on the sustainable use living marine resources and protection of the marine environment
22	Actions 1.2.7 and 1.2.8 No PI identified
14-15	Action 1.1.1: Private sector actors should include IBEC (as the body with direct relationships with business and industry and which has an environmental policy section) to encourage and ensure that biodiversity is on the agenda. See also the comment under Objective 3 below (comment 49).
15-16	Action 1.1.1 Action 1.1.1. All public authorities and private sector move towards no net loss of biodiversity ... The monitoring, reporting and actions taken as a result of this target should be built into each plan or project e.g. to examine how successful the strategy or mitigation is, and what actions are needed to address any identified issues. It would help to allocate a person responsible for overseeing the success or otherwise of no net loss of biodiversity in each project or plan otherwise there may be no real tangible result.
15-16	Action 1.1.1: The enforcement of conditions of planning is often required for mitigation related to biodiversity but with limited resources the competent authority may not be able to carry this out. Therefore reporting to the competent authority on mitigation and monitoring by a consultant on behalf of the proponent of the project or plan may be required more and more in the future.
15-16	Performance Indicator for Action 1.1.1: It is unclear how BnM restoration etc. achieves no net loss. It is considered that the NBAP should be looking to more agencies (other than just than EPA and BnM) and it should be a target to add agencies such as OPW, Dept Agriculture etc. to this list.

Page	Comment
email	<p>a. In the table of actions, we would have expected that some summary or report on the legislative 'gaps' or reference to specific legislation would be outlined.</p> <p>b. Legislation and regulation and/ or programmes are designed to assist in ensuring ecological areas are renewed, rebuilt and indeed new areas established should be considered. This would be in keeping with the current Green Infrastructure principles.</p> <p>Please note ILI can assist in dialogue with the EU through the BGI WG in ILI and linkage to IFLA Europe and the Green Infrastructure Committee in the European Commission (EC).  <a href="http://ec.europa.eu/environment/nature/ecosystems/index_en.htm">http://ec.europa.eu/environment/nature/ecosystems/index_en.htm</a>. 1. We suggest a list of legislative changes and new statutory instruments be prepared and used as a means to ensuring such legislation is brought forward and enacted.</p>
Survey Monkey	Do you have any specific feedback on Objective 1 and its actions? Yes as long as it is inclusive
Survey Monkey	<p>1. Increase enforcement and improve reviews of transgressor of regulations (ie, felling license follow up).</p> <p>2. Improve education and awareness, regulations and maintenance of road side tree/hedgerow pruning and cutting (ie, ensure appropriate cutting times, flail blade maintenance and proper tree practices are in place). Poor practice is not only unsightly but weakens the genetic strain and invites decay and future damage</p>
Survey Monkey	<p>1.1.1 While we welcome the overall objective, we believe that the Our Sustainable Future document, which sets out a framework for advancing sustainable development and the green economy in Ireland, has failed to implement significant change in this sector. Killarney National Park may lose its UNESCO status<sup>1</sup> and turf-cutting continues on some of our nation's most vulnerable boglands. The National Biodiversity and Action Plan must call on this government to create a more binding, legislatively meaningful, and properly funded system for the protection of such habitats.</p>

Page	Comment
Survey Monkey	<p>A. In the Table of Actions, we would welcome a summary or brief report on the legislative 'gaps' or reference to specific legislation would be outlined. B. Legislation and regulation and/ or programmes are designed to assist in ensuring ecological areas are renewed, rebuilt and indeed new areas established should be considered. This would be in keeping with the current Green Infrastructure (G.I) principles. Note: ILI can assist in dialogue with the EU through its ILI Blue-Green Infrastructure (B-G.I) Working Group via linkage to IFLA (International Federation of Landscape Architects - - Europe Region; and thereby to the Green Infrastructure Committee in the European Commission (EC).</p> <p><a href="http://ec.europa.eu/environment/nature/ecosystems/index_en.htm">http://ec.europa.eu/environment/nature/ecosystems/index_en.htm</a></p>
Survey Monkey	<p>As discussed below, we believe that being explicitly named as a 'Key Partner' for 4.1.8 the Irish Seed Savers Association would be better recognised by national and local authorities, and therefore be better able to contribute and influence the success of this objective. Other government agencies such as the OPW, Teagasc and the Heritage Council have begun to participate with ISSA on the successful conservation of Irish Genetic Resources, however there is significant opportunity to increase cooperation. By planting Irish varieties of fruit, vegetable and grain at publically owned and maintained gardens / sites significant progress will be made in the conservation effort - this would be efficient use of tax-payers money as purchasing Irish grown seed and trees would substitute for purchases of imported plants. We have noticed positive participation by some county councils, schools, and community groups across the country in choosing Irish grown vegetable seeds and fruit trees - this proves that if biodiversity became more mainstream, the success rate could multiply significantly.</p>
Survey Monkey	<p>Biodiversity and it's protection should be central to all decision making in all sectors and each sectors should have stated policy and responsibilities and must report back regularly on progress. Particularly in the areas of Agriculture, Marine, Planning, Transport, Energy and Tourism.</p>
Survey Monkey	<p>Biodiversity should be mainstreamed in the decisionmaking process.</p>

Page	Comment
Survey Monkey	I support the objective.
Survey Monkey	It seems that public athorities such as Galway city and county councils are handing over responsibility for developments such as roads and other major to developments to private developers who obviously stand to profit from said developments. Local protests and requests to protect the natural area, biodiversity and finding of alternatives are being ignored...ridiculous amounts of money are being wasted. There are so many sites and alternatives that would stop the further destruction of ancient ecosystems and areas of natural beauty. What GCC have done is a crime in my opinion. I don't think these completely unqualified people should have been allowed to rezone land of such environmental importance so they could build on it...
Survey Monkey	It will be nice to see this happen, i have my doubts.
Survey Monkey	Many actions are well meaning but not clear hwo adminstrative or enforcement changes will allow these to take place. Some of these have been on a wish list for a long time- what is changing to make them achievable? How can more highly qualified ecologists be employed in local and central govt through this Plan?
Survey Monkey	Many plans such as food harvest 2020 were published without a SEA. This must be challenged by NPWS.When NPWS are asked to comment on planning applications by consultants or NGO's, there is often no response. This was brought us as a serious issue by An Bord Plenala at a conference I attended run by the Environmental Pillar. An bord Plenala do not have the expertise to judge on the importance of a site or species, and feedback from NPWS was often not forthcoming.
Survey Monkey	Native oyster reefs, native oysters, native blue mussels and many others are unlikely to recover in the presence of the alien invasive Pacific Oyster used in oyster farming - so the practice of dishing out licences for oyster farming to anyone who cares to apply will have to stop.. Can you put it in the mainstream decision making process - that the Pacific Oyster will result in the extinction of our native oysters, native mussels and native reefs and put many other species at risk - for eg, oyster catcher birds, seals and dolphins.

Page	Comment
Survey Monkey	Objective 1 is supported by the LAHOs. It is recommended that the opportunity to mainstream biodiversity decision making throughout local government needs to be further strengthened and that local government is a key strategic partner for the delivery of action for biodiversity at regional and local level.
Survey Monkey	Our elected representatives are much more aware now of the importance of biodiversity as an indicator of the health of our economy and for community well-being. As such it is hoped that they will direct long-term sustainable growth through the development of appropriate legislation during the implementation of this plan. The draft plan states (1.2.4) that "Further review Section 40 to ensure control of invasive species may be carried out subject to screening process in the summer months". This is crucial and needs to happen sooner rather than later. The control of most terrestrial invasive plants is dependent on systemic herbicides which, by nature, need to be controlled in the summer months. This should be linked to more best practice information on mechanical control and other methods.
Survey Monkey	Recently the government failed completely in this regard when an taisce lobbied to have our mid land bogs preserved, it is obvious the current governments priority is not biodiversity
Survey Monkey	Regarding Target 1.2 to strengthen legislation - this can only be acted upon with a statutory body that has a full workforce that is enabled to enforce the legislation. Wildlife conservation rangers are a fantastic scientists and wildlife advocates but they are thin on the ground at present, morale is poor as consecutive governments fail to show leadership or concern about biodiversity loss. Changing NPWS to a State Agency would mean that it would be less of a political tool and more able to fulfill its role. Ensuring that there are enough rangers on the ground is also essential. Finally, it is important to improve cooperation among members of An Garda Siochana to ensure that wildlife protection is taken seriously by the force.

Page	Comment
Survey Monkey	The Draft National Biodiversity Action Plan (2017-2021) outlines the commencement of LIFE projects including AranLIFE. These projects gather a lot of important information but require the policy instrument to ensure that the information gathered is put to best use both within the LIFE project area and also replicated in other areas. To achieve this additional measures are required within the RDP other than generic agri-environment schemes. It is vital for the national biodiversity strategy, that projects such as AranLIFE and the other 5 EU LIFE projects, have a pathway within the main decision process across all sectors and are not seen as one-off events.
Survey Monkey	There needs to be a stronger and clearer statement/action point re the putting in place of a full suite of biodiversity officers across ALL local authorities.
Survey Monkey	This decision should be left to the Irish People and Irish people only
Survey Monkey	This is going to be difficult to achieve but is very worthwhile. As noted in Objective 6 below, there is a need to ensure consistency in the implementation of existing legislation. In some developments, bat assessments are a planning condition and this increases the pressure on Councils and NPWS to seek a compromise for bat related issues as they would be seen to be preventing development for bat issues when a project (etc.) has received planning approval. This may lead to roost loss where in advance of planning alternative solutions may have been devised

Page	Comment
Survey Monkey	<p>We would like to highlight the cross-sectoral potential surrounding the issue of Light Pollution. During the successful bid for Mayo Dark Sky Park status relationships were initiated across a variety of government organisations e.g. Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Coillte and Mayo County Council. This successful model of cross sectoral co-operation has potential to be implemented in other organisations and to link with sympathetic areas such as energy efficiency and climate change. Section 1.1.2 We specifically would ask that all new policies take account of Light Pollution when considering biodiversity Section 1.1.3 It is imperative that Public and Local Authority staff are aware of Light Pollution and have the requisite knowledge and expertise. Section 1.1.4 We propose that all current and new Biodiversity and Heritage Action Plans take account of the effects of artificial light on wildlife, human health and energy efficiency. Section 1.1.5 The availability of guidance documents on Light Pollution should be available to all relevant parties.</p>

Page	Comment
	<p>Do you have specific feedback on Objective 1 (To mainstream biodiversity in the decision making process across all sectors) and its actions?</p> <p>Yes,</p> <p>a. No one knows who or what the state agencies are, that should mainstream biodiversity. This has been the case since the first plan 15 years ago. For Transparency - A comprehensive directory of Agencies and Sectors should be provided in Tabular Form, in each National Plan going forward, including this one.</p> <p>b. The First Plan under 2.2 included an action for the drafting of Sectoral Action Plans for state agencies and sectors to produce their own biodiversity action plan. The current and subsequent national plans should refer to this requirement. If it is abandoned the proposed plan should clearly state so. However, I would advocate that the action of the first plan regarding development of Sectoral and Agency BAPs be brought back in as an action if it has been abandoned. Without it beneficial measures for biodiversity are prone to being (a) 'ad hoc' or incoherent within or among Departments and Agencies or (b) incidental to other Policies and subject to use as Green washing paint by the Department/Agency</p> <p>c. If the requirement for Sectoral Action Plans has not been abandoned, then the proposed and subsequent plans should clearly reference all outstanding sectoral and agency BAPs (An ideal place to do so would be in the aforementioned tabular directory of agencies and sectors).</p> <p>It is my understanding that DAFM in particular, as a Sector with large land holdings under their administrative remit or ownership, have not developed a Biodiversity Action Plan since the first national plan 15 years ago. NAMA is a new Irish land holding mega-owner and perhaps it too should have a BAP. Both these actors are big stakeholders in land-use of Ireland's terrestrial resource.</p>



Page	Comment
	<p>A lot more detail has been put into outlining specific commitments that will be made to strengthen/ mainstreaming of biodiversity in the new cycle.</p> <p>“Under this NBSAP further action will be undertaken to raise awareness within Government Departments, Local Authorities and state agencies of the implications of policy and decisions on biodiversity, through, for example, the articulation of no net loss biodiversity targets in plans/policies and the strengthening of ecological expertise. In addition, engagement with the private sector will be improved through the establishment of a national Business and Biodiversity Platform under the CBD’s Global Business Partnership.</p> <p>In previous Plans, local action was highlighted as being very important in tackling biodiversity loss. Local Authorities will review and update their Biodiversity and Heritage Action Plans as well as their Development Plans and policies, giving due consideration to the protection and restoration of biodiversity. To support locally-led action to safeguard biodiversity and ecosystem services additional biodiversity-related guidance for Local Authorities will be published. For example, on screening for Appropriate Assessment for Planning Authorities as well as best practice guidance for use of GIS in Strategic Environmental Assessment (SEA), for cumulative effects assessment and for better practice in SEA for the energy sector.</p> <p>Ireland will continue to implement key EU Directives to improve Ireland’s environment and wildlife. The EU Directive on SEA came into force in Ireland in 2004, obliging consideration of biodiversity in public plans and programmes, mainly due to the need to meet reporting requirements for various EU Directives. A recent review shows that SEA is fulfilling its role and is providing a vital tool for environmental protection in Ireland<sup>35</sup>. SEA ensures that environmental considerations are taken into account in policy development and implementation and is raising the profile of environmental issues in decision-making at plan level among 11 sectors applying SEA.</p> <p>Under the EU Nature Directives Ireland must contribute to Natura 2000 network of sites for the protection of Europe’s most valuable and threatened habitats and species (see Objective 6). The Government intends to streamline financial expenditure tracking relating to Natura 2000 and biodiversity more broadly, including linkages to the Prioritised Action Framework for Natura 2000 (PAF). The Prioritised Action Framework is a tool used by EU Member States</p>

Page	Comment
	<p>Below lists some of the objectives, targets and actions from the draft 3rd National Biodiversity Action Plan that SECAD is happy to support. The implementation of some of those listed SECAD through its current and planned activities, is already contributing to or plans to contribute to on the ground.</p> <p>SECAD would welcome the opportunity to contribute to implementing other actions and would welcome input on how we could do so from parties involved in developing the 3rd National Biodiversity Action Plan.</p> <p>OBJECTIVE 1. Mainstream biodiversity in the decision making process across all sectors</p> <p>TARGET 1.1: Shared responsibility for the conservation of biodiversity and the sustainable use of its components is fully recognised, and acted upon, by all sectors.</p> <p>ACTION 1.1.1. All public authorities and private sector move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in green-blue infrastructure.</p> <p>ACTION 1.1.2. Public and Private Sector relevant policies and decisions explicitly consider implications for biodiversity and engage with this NBSAP.</p> <p>ACTION 1.1.3. Strengthen ecological expertise in public authorities.</p> <p>ACTION 1.1.4. Local Authorities will review and update their Biodiversity and Heritage Action Plans as well as their Development Plans and policies giving due consideration to the protection and restoration of biodiversity</p> <p>ACTION 1.1.5. In consultation with Local Authorities, continue to publish guidance for Local Authorities regarding biodiversity</p>

Page	Comment
	<p>COMMENT Objective 1. Mainstream biodiversity in the decision making process across all sectors</p> <p>While the objective of ‘shared responsibility for the conservation of biodiversity...’ is crucial, effective conservation will require a strong key authority leading and assisting with initiatives across all departments. The cuts to NPWS over recent years have been severe and beyond the scale of cuts suffered by other sectors, in the region of 40% cut to NPWS funding. This is totally unacceptable. In 2012 NPWS was allocated €4.943 million, in 2015 it was €3.871 million. Because of these cuts and the resulting financial constraints, the morale and capacity within the agency is low, it is unable to do its job effectively, and Ireland remains lacking in a much needed proactive and positive coordinator of biodiversity actions. This is reflected in a lack of advocacy from the agency for effective proactive conservation measures in its own department and in other key departments. Without a restoration of NPWS funding this objective or the targets associated will not be achieved.</p>
	<p>COMMENT Our Heritage Plan is in direct compliance with Objective 1 which seeks to mainstream biodiversity and heritage into decision making, policies and operations of all our activities. One such example of implementing this objective is our development of Biodiversity Impact Assessments to progress the sustainable development of Blueways along several of our designated waterways (Action 1.1.2).</p>
	<p>I think that the plan should articulate the need for specific and dedicated funding stream for research and education, otherwise it will be difficult to achieve many of the targeted objectives and Targets</p>
	<p>I wondered if the Table needs to retain the "Related actions" column, as there does not appear to be any text in this column in the document?</p>

Page	Comment
	<p>Objective 1:</p> <p>Comment: There are multiple actions relating to research funding into biodiversity or ecosystem functioning (e.g. Actions 2.1.1, 2.1.6, 2.1.10, 2.1.12, 3.1.4, 7.2.2). However none include quantified monetary targets. The success of these actions cannot be measured without appropriate targets (see Section 1.1)</p>
	<p>While the objective of ‘shared responsibility for the conservation of biodiversity...’ is crucial, effective conservation will require a strong key authority leading and assisting with initiatives across all departments. The cuts to NPWS over recent years have been severe and beyond the scale of cuts suffered by other sectors, in the region of 40% cut to NPWS funding. This is totally unacceptable. In 2012 NPWS was allocated €4.943 million, in 2015 it was €3.871 million. Because of these cuts and the resulting financial constraints, the morale and capacity within the agency is low, it is unable to do its job effectively, and Ireland remains lacking in a much needed proactive and positive coordinator of biodiversity actions. This is reflected in a lack of advocacy from the agency for effective proactive conservation measures in its own department and in other key departments. Without a restoration of NPWS funding this objective or the targets associated will not be achieved.</p>

Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Objective 2	
Page	Comment
24	1st Paragraph Comment in response to: Five Red Lists were published for species of: large moths <sup>50</sup> , mayflies <sup>21</sup> , mosses and liverworts <sup>51</sup> , amphibians, reptiles and freshwater fish <sup>52</sup> , and dragonflies <sup>22</sup> .
24	1st Paragraph NEW TEXT replace “Five Red Lists” with “Six Red Lists” and add “vascular plants <sup>ref</sup> ” and a reference to this (see publication) after “mosses and liverworts” .
24	1st Paragraph NEW TEXT : . A significant amount of monitoring, assessment and research was undertaken to fulfil obligations under the EU Habitats, Birds, Marine Strategy Framework Directive, Maritime Spatial Planning Directive and Water Framework Directives
24	3rd Paragraph delete “lichens” – there is no expert here to do or supervise this and we really cannot commit to it.
24	3rd Paragraph NEW TEXT in last line delete “vascular plants” and replace with “charophytes” (Áine happy for this change).
24	4th Paragraph NEW TEXT: In addition, progress towards the development of a national Red List Index will be made via the undertaking of new Red List assessments (for example elasmobranchs, lichens, seaweeds, ground beetles and other well recorded insect groups), which assess extinction risk of these taxonomic groups, and the repetition of existing Red List assessments.”
24	Formerly, Objective 2 in the July NBAP draft read “Strengthen the knowledge base for conservation, management, restoration and sustainable use of biodiversity.” The reference to restoration should be reinstated. The removal of restoration waters down the ambition of Objective 2. Actions 2.1.9, 2.1.19, 2.1.23 and 2.1.24 all make reference to biodiversity restoration. It is of concern to An Taisce that sectors which are major drivers of biodiversity loss are responsible for carrying out research into their own impact on the environment. This fundamentally biases not only research recommendations but the very questions that are being asked in the first place. Research carried out by the Agri-food and the Forestry Sectors to justify the unsustainable intensification of agriculture and forestry in Ireland is unlikely to benefit biodiversity. An example of

Page	Comment
24	<p>Objective 2 - Substantially strengthen the knowledge base for conservation management and sustainable use of biodiversity</p> <p>Mountaineering Ireland suggests incorporating the mapping of High Nature Value (HNV) land within action 2.1.2.</p> <p>There is a considerable focus within the plan on marine issues, for example action 2.1.21 recommends research into the threat posed by marine litter, yet there is also need for research into the impact of litter on terrestrial biodiversity.</p>
25	3rd Paragraph Comment on: Marine Research Strategy is due to be published in 2016.
25	Comment in response to The EPA has published its research strategy for 2014-2020 <sup>63</sup> centred
25	Comment in response to To underpin this mapping, work will continue on the development of a National Vegetation Classification scheme, including for marine habitats .
25	Land use is a significant driver and should be included here
26	With respect to Action 2.1.2, see point 2 c above regarding a request to initiate a Recurring National Biodiversity Inventory and Biodiversity Retention Targets
26	<p>2.1.1 The biodiversity research program should be tied to the national biodiversity plan cycle, so that research priorities for the next 5 years can be included in the Biodiversity Plan. It is recommended that this action reflects that position. It is also recommended that the recommendations for biodiversity research that were produced in 2012 are summarised in the 3rd plan</p>

Page	Comment
26	<p>2.1.1. Review needs for biodiversity research in 2019</p> <p>Per the NBAP, the last Platform for Biodiversity Research (NPBR) recommendations were produced in 2012. A lot of new threats to biodiversity and research needs have emerged in the intervening years. Another meeting of the NPBR should be sought.</p> <p>On-going research, needed to address identified knowledge, is lacking for many taxonomic groups. Greater attention should be paid to the monitoring of flora and invertebrates as indicators of conservation status and biodiversity loss. Trends in conservation status of habitats and species covered by the Habitats and Birds Directives are useful but may fail to reflect biodiversity loss in the broader countryside or highlight biodiversity loss at lower trophic levels before it too late.</p> <p>There is an urgent need to identify remaining High Nature Value farmland and in particular seminatural grasslands. This information is key to tackle land-use change being driven by agricultural intensification, land abandonment and afforestation. This data would help An Taisce enforce EU regulations relating to the protection of High Nature Value farming systems from afforestation. Improved mapping of habitats and species will help to improve the targeting of agri-environmental schemes and in particular LLAES.</p> <p>The effectiveness of agri-environmental schemes and their costs and benefits should be thoroughly researched.</p> <p>Mapping the distribution of invasive species and in particular aquatic invasive species will have important implications. Research must also be carried out on the increased threat of invasive species colonisation in light of climate change projections and continental European and British shifts in species distributions. Given our comparatively low diversity of species relative to continental Europe and the fragmentation of many habitats, climate change and invasive species may have worse impacts on Irish biodiversity than is currently expected. Recent research from the UK has identified that many species are in fact not successfully adapting their distribution in response to climate change. Specifically, high-intensity land use appears to exacerbate declines in cold-adapted bird and butterfly species, and prevent increases in warm-associated birds. This has broad implications for managing landscapes to promote climate change adaptation. Further research which considers rates</p>

Page	Comment
26	2.1.2 Which agency is the key driver behind this initiative and should the NBDC not be involved in this action too and perhaps lead it, subject to financial and manpower resources being provided to do so?
26	2.1.2. Complete national terrestrial habitat, land cover, land use, and ecosystem service maps This is of critical importance. Where possible, habitat quality should also be recoded.
26	2nd Paragraph NEW TEXT: Under this NBSAP research will be undertaken to enhance knowledge of the most significant direct and indirect causes of biodiversity loss and to develop and test prevention and mitigation options in that regard. It is also imperative that we improve understanding of the consequences of loss of biodiversity caused by sectoral activities for ecosystem functioning and provision of the broad spectrum of ecosystem services. Such knowledge is required to inform trade-offs between multiple activities to maximise overall benefits and minimise impact through spatial planning. There is consensus among scientists that climate change affects biodiversity and that it is likely to become one of the most significant drivers of biodiversity loss by the end of the century <sup>66</sup> , including through its influence on dispersal of local stressors, such as pollutants or invasive species, and modification of their effects <sup>y66</sup>
26	Action 2.1.1 Comment on Performance Indicators: Academia and Research Institutions
26	Action 2.1.2 Numbering appears to be wrong
26	Action 2.1.2: The completion of this action is essential and timeframes could be more ambitious for individual components. E.g. would suggest that it is realistic that national landcover and habitat map be completed by 2019 given that work started in 2012. The habitat map needs to incorporate regular monitoring and update (every 5 years) to facilitate its use in national biodiversity, land cover and land use change monitoring.



Page	Comment
26	<p>Appropriate Assessment Screening required for NBAP</p> <p>No Appropriate Assessment Screening report was published with the draft NBAP.</p> <p>The document Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities clearly indicates that all statutory and non-statutory plans and strategies including those that are designed or intended to benefit the environment such as Biodiversity plans are subject to AA screening:</p> <p>2.1.1. Plans include all statutory and non-statutory land use, framework and sectoral plans and strategies to the extent that they have the potential to have significant effects on a Natura 2000 site. This incorporates ‘plans and programmes’ covered by the SEA Directive<sup>11</sup>, and other plans and strategies, including those that are designed or intended to benefit the environment or heritage, such as Heritage and Biodiversity plans, recreation/amenity plans or strategies, and River Basin Management Plans</p> <p>Local Authorities are required to publish these AA Screening Assessments or NIS reports at consultation stage of these types of plans. We fail to see how this guideline does not apply to the NBAP and DAH/NPWS. Particularly, given that the NPWS requires every other individual and agency to prepare AA screening assessments for even the smallest of projects and plans, the lack of an AA screening report for the NBAP by DAH/NPWS really sends out the wrong message. If DAH/NPWS wishes others to prepare these screening reports, they should do it too for their own plans to give the right example (irrespective if the legislation requires an AA screening report to be prepared for a “strategy and action” document).</p> <p>Prioritized Action Framework</p> <p>The prioritized Action Framework should be drawn up for the same period as the National Biodiversity Plan. By doing this, the priorities for research and conservation measures for the next 5 years can be clearly communicated to all stakeholders in the national plan. This may help different agencies and groups to apply for funding at local, national and EU level to contribute to the implementation of these priority actions.</p>

Page	Comment
26	<p>COMMENTS With regard to target 2.1 knowledge of biodiversity and ecosystem services I have the following observations:</p> <p>1 - Centralise biodiversity records to NBDC. At present there is some duplication with NPWS</p> <p>2 - Make high quality data available to local authorities and developers. At the moment data held by NBDC is generally low resolution. This would be more useful if available in shapefile format.</p> <p>3 - Make maps of QI habitats for SACs available. There does not appear to be sufficient baseline information available for many SACs. Many appear to have arbitrary boundaries that do not correspond to QI habitats.</p>
26	<p>It is suggested that an additional action point under this objective could be for "NPWS to facilitate and support the development of a data sharing mechanism (where data is derived through EclA and AA) or at least to explore the possibility of collating data from site level assessments for wider use". This is particularly relevant for mobile species such as birds and cetaceans but is also relevant for habitats and all species groups within the context of cumulative impact assessment which is currently not properly addressed in the impact assessment process.</p>
26	<p>Target 2.1 An additional Action under this objective would be to include a national habitat map to Level 3 Fossitt.</p>
26	<p>Target 2.1 In general, most of the emphasis in these actions is on improving knowledge on existing biodiversity rather than improving knowledge and methods for biodiversity conservation and restoration. It is considered that more emphasis needs to be put on addressing biodiversity loss. It is considered that an additional action should be to provide best practice guidance to ecological practitioners on impact assessment, especially Appropriate Assessment and cumulative impact assessment. Actors / key partners would be DAH, EPA and CIEEM.</p> <p>Performance indicator would be guidance produced. Baseline guidance of relevance includes existing AA guidance for local authorities and CIEEM guidance on EclA in UK and Ireland (2016).</p>
26	<p>Target 2.1.2: Update the baseline to reflect the Memo for Government and the involvement in the National Geospatial strategy</p>

Page	Comment
27	<p>2.1.4 We recommend that Local authorities should be involved in this action too. Ideally this data would be provided in a GIS database within each local authority. This would allow planners to assess a site very quickly for the presence of rare species and habitats for example. This system is already in place in Fingal County Council and works very well.</p>
27	<p>2.1.4. Make available data and mapping on rare, threatened and protected species and habitats to all public authorities and developers and agents acting on their behalf to inform consent decisions including integrating this data into the FS-DAFM's iFORIS system and corresponding iNET system used by Registered Foresters</p> <p>This is relevant to points made above in relation to the conservation of FPO species. This data should also be made available to An Taisce as a statutory consultee with a remit which includes the protection of natural heritage. Care should be taken that rare populations are not exposed to prosecution or exploitation. The NPWS are generally very good at keeping sensitive species data out of the public domain.</p>
27	<p>2.1.5. Continue to implement common data standards and quality assurance procedures in line with the INSPIRE Directive and ensure that data and mapping on rare, threatened and protected species and habitats are freely available</p> <p>Again care should be taken that rare populations are not exposed to prosecution or exploitation. The NPWS are generally very good at keeping sensitive species data out of the public domain.</p>
27	<p>Action 2.1.3 Observation: In light of the role of the Data Centre in managing the National Vegetation Database, the National Biodiversity Data Centre should probably be included as one of the Actors/key players (even if only as a supporting actor to the Department).</p>

Page	Comment
27	Action 2.1.4 Comment on: Make available data and mapping on rare, threatened and protected species and habitats to all public authorities and developers and agents acting on their behalf to inform consent decisions including integrating this data into the FS-DAFM's iFORIS system and corresponding iNET system used by Registered Foresters
27	Action 2.1.4 NEW TEXT Baseline: As habitat surveys are conducted along arterial drainage channels, habitat maps are now made publicly available through
27	Action 2.1.4 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22.
27	Action 2.1.5 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22. The licencing protocols and data loading systems for publishing data through the Data Centre's mapping portal Biodiversity Maps provides a shared-service for publishing biodiversity data through the ISDE to the gov.data.ie portal. Subject to availability of resources, this can be expanded to include additional types of biodiversity data.
27	<p>With respect to Action 2.1.4, I suggest also that there should be a centralised website for SEA, EIA and AA documents for the public to access. The documents should be available permanently and not taken down once permission is granted or denied.</p> <p>It would also be useful to be able to click a location or radius extent on a Web GIS map (NPWS OSI etc) and have all the Designated Sites and qualified features of interest listed, with information on their conservation goals and their favourable conservation status or population data. This information should be able to be printed. Currently looking into Conservation objectives or conservation status of features of interest requires sourcing pdfs, compiling the data separately before printing off. This makes Screening Reports time consuming and inefficient for competent authorities.</p>

Page	Comment
28	<p>2.1.6. Support research on economic and societal valuations and non-economic valuations of ecosystem services and benefits and how biodiversity underpins these values</p> <p>It is the view of An Taisce that it is equally important to carry out research investigating the economic cost of the destruction of biodiversity, seeking to answer such questions as, the cost of peatland destruction on water supply, water quality (trihalomethanes), carbon sequestration, flood attenuation, biodiversity etc. The destruction of Ireland's peatlands continues to be justified on that basis of job creation. These jobs, in the case of peat energy are subject to massive subsidies. In addition to this, the true cost of peatland destruction is externalised on the rest of society. This is also true of intensive livestock production. Research should be carried out which highlights the value of ecosystem services and the true cost of biodiversity loss on society and future generations. Research findings should be linked to the polluter pays principle.</p>

Page	Comment
	<p>2.1.7. Continue assessments on status, trends and distribution of all habitats and species of EU interest and additional habitats and species of national and regional importance</p> <p>The Article 17 and Article 12 reports are critically important in assessing conservation priorities. The next Article 17 report is due in 2019 and the Article 12 report is due in 2020, both within the life of the third NBAP.</p> <p>The July draft of the NBAP set a mid-term target of achieving a state of knowledge for 60% habitats and 100% species deemed sufficient. This mid-term target should be reinstated.</p> <p>A more user-friendly summary version of the reports should be produced to raise public awareness about biodiversity loss, Ireland's Natura 2000 network and to educate the public about the work of DAH. Comparisons should be made between data sets collected for each report.</p> <p>As previously mentioned, research should look beyond EU obligations to Annexed habitats and species and should be targeted at ensuring the long-term viability of ecosystems, taking into account</p>
28	the need to allow for species and habitat distributions to shift in response to climate change.
28	Action 2.1.3 Comment on Action- As above, I'm not sure it is appropriate to develop a new classification scheme for marine habitats, although there may be a case for mapping.
28	Action 2.1.6 NEW TEXT Baseline: Numerous projects are noted in report on implementation of the second NBSAP including, ecosystem services from forestry, woodland, upland farming, renewable energy and marine sector.
28	Action 2.1.7 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22.
28	Action 2.1.8 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22. However, the Data Centre urges caution in any wholesale modification of the current suite of agreed indicators and their presentational format. Instead efforts should first be invested in gaining wider acceptance of the current indicator set, and establishment of processes to facilitate regular and more efficient updating of the background indicator data.

Page	Comment
28	Action 2.1.9 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22. The Data Centre is ideally placed to target and structure citizen science recording to improve its value for tracking change and to supplement existing needs, for example, Article 17 reporting. The extent to which this can be done is directly related to the scale of resources provided to deliver programmes, but such investment is an extremely cost-effective way of filling information gaps and directly engaging the general public in biodiversity conservation
28	With respect to Action 2.1.6 is Teagasc or DAFM missing as Actors or key partners
29	With respect to action 2.1.8, I would refer to Point 2 c outlined above. Biodiversity indicators alone are not enough to plan, act and monitor biodiversity recovery.
29	2.1.8. Build on the National Biodiversity Indicators to develop state, pressures, and response indicators to allow assessment of Ireland's national and international biodiversity commitments by 2020, including the 3rd NBSAP, the EU Biodiversity Strategy, the Convention on Biological Diversity, and the Sustainable Development Goals Many of the indicators relate to knowledge and awareness of biodiversity. An Taisce's Green Schools Programme should be included as a key partner.
29	2.1.9 It is recommended that this action be split in two as these are distinctly different actions: Support and encourage the volunteer network and local communities to carry out biological recording and other citizen science project Provide grants to volunteering and local community groups for activities such as habitat conservation management, monitoring and restoration research needs

Page	Comment
29	<p>2.1.9. Support and encourage the volunteer network and local communities to carry out biological recording and other citizen science projects including grants for such activities as habitat conservation management, monitoring and restoration research needs</p> <p>The scope of this action has been greatly improved upon since the previous draft. Those at the grassroots level of conservation must be empowered if we are going to halt biodiversity loss. Closer coordination between public authorities, Ireland's NGO network and community level conservation groups should be fostered. An assessment should be carried out to identify as many NGO and community level groups as possible. Angling and hunting groups should also be key allies in the conservation of species such as Atlantic salmon, red grouse and grey partridge. The actors/key partners list needs to be expanded. Biodiversity and environmental research is also carried out by Clean Costs, Irish Wildlife Trust, Bat Conservation Ireland, Irish Raptor Study Group, Irish Seal Sanctuary, Golden Eagle Trust.</p> <p>DAH should utilise volunteer networks in order to carry out habitat management and restoration. It has been demonstrated in several cases that community level conservation can yield great benefits for biodiversity. DAH should seek to provide funding and expertise to direct conservation efforts. This should include utilising international and Irish conservation volunteers to manage invasive species in National Parks, for example.</p> <p>The education unit of An Taisce have an excellent track record of empowering communities to positively impact upon the state of their local environment. Excellent work is being carried out at a grassroots level by programmes such as Clean Coasts, Green Communities, National Spring Clean etc. These programmes should be included in the Actors/Key partners list.</p> <p><a href="http://www.antisce.org/education">http://www.antisce.org/education</a></p> <p>In terms of community grass roots initiatives An Taisce Green Communities has organised activities at Bridgefoot Street Community Garden and elsewhere over the last few years. These events are organised to facilitate skill sharing amongst community gardens, allotments, residents associations, and other community groups in and around Dublin. Green Communities has been supporting a network of some 30 community groups to work together since 2008, and its activity supports social</p>
29	Action 2.1.10 No PI identified
29	Action 2.1.8: BASELINES NEW TEXT: Coordinate with indicators required for the MSFD / OSPAR



Page	Comment
29	Action 2.1.9 - CWF recommend Uplands Forum, IWT and Academic Institutions is added as actors. We recommended in our submission to explore the Lottery Funding for biodiversity restoration and conservation projects in collaboration with communities as provided for already under the act. This could be added as an action under 2.1
29	Action 2.1.9 Include Local Authorities and Irish Wildlife Trust under Actors and Partners
29	Action 2.1.9 NEW TEXT Baseline: BirdWatch Ireland, Bat Conservation Ireland and IWDG deliver important national surveys based in part on volunteer effort with BWI providing training workshops on survey protocols for wintering waterbirds and farmland birds.
29	Action 2.1.9: NPWS should prioritise advice and support to these projects on the ground as a policy aim of the organisation either directly or through the development of a LA Biodiversity Officer network
29	Action 2.1.9. Support and encourage the volunteer network and local communities to carry out biological recording and other citizen science projects including grants for such activities as habitat conservation management, monitoring and restoration research needs.
29	Comment in response to Action 2.1.9
29	With respect to action 2.1.9, The farming community is missing as actors or key partners – Teagasc, DAFM Macra, NHFA etc. Urban councils are also missing.
30	2.1.11 It is not clear how the first performance indicator is linked to the action and it is suggested this is removed. A similar PI is listed under action 2.1.16  Which actor is the lead on this action?

Page	Comment
30	<p>2.1.11. 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</p> <p>Research findings should be made publicly available and ensure that enhanced knowledge on direct, indirect and cumulative impacts informs planning decisions, SEA etc.</p> <p>Where direct, indirect and cumulative impacts are known, concrete steps must then be taken to address them. In the case where negative impacts are in breach of environmental legislation then enforcement must be carried out by the relevant authorities.</p> <p>Research should be carried out to enhance the enforcement of environmental regulations.</p>

Page	Comment
30	<p>2.1.12 Continue forest research programme on forest biodiversity, carbon accounting and the interaction of climate change and forest systems</p> <p>None of the listed actors/key partners include an environmental body. DAFM, COFORD and the Forestry Service may be biased by the national targets for forestry expansion. In our experience the Forest Service, DAFM and Coillte are unwilling to accept concrete scientific evidence which shows that forestry is responsible for the ongoing collapse of species such as the Hen harrier. How then can these bodies be left responsible for carrying out research on the impact of forestry?</p> <p>Given the aggressive targets set for afforestation, the age class structure of the forest estate and the distribution of existing forestry in Ireland it is clear that the negative impact of forestry on biodiversity will only increase over the lifetime of the current NBAP. Research needs to be carried out on how to address the already established negative impact of commercial forestry in Ireland on upland and freshwater biodiversity. This should include a mapping system which ensures that afforestation of land containing high nature value farming does not take place.</p> <p>Research should be carried out on the benefits of agroforestry, continuous cover forestry and species diversification. The research recommendations of the HYDROFOR and EPA Strive report 99 on the Management Strategies for the Protection of High Status Water Bodies should be implemented.</p> <p>See as mentioned above the following relevant documents:</p> <p>The environmental integrity of Irish forestry in the context of the EU's effort sharing decision (2016)</p> <p><a href="http://www.antisce.org/publications/the-environmental-integrity-of-irish-forestry-in-the-context-of-the-eu%E2%80%99s-effort-sharing">http://www.antisce.org/publications/the-environmental-integrity-of-irish-forestry-in-the-context-of-the-eu%E2%80%99s-effort-sharing</a></p> <p>An Taisce submission Re: Draft Environmental Requirements for Afforestation (2016)</p> <p><a href="http://www.antisce.org/articles/an-taisce-submission-re-draft-environmental-requirements-for-afforestation-2016">http://www.antisce.org/articles/an-taisce-submission-re-draft-environmental-requirements-for-afforestation-2016</a></p>

Page	Comment
30	Action 2.1.10 ADD 1. Number of international cooperative funding programmes in which Ireland is a partner. 2. Number and value of grants won.
30	Action 2.1.11 Observation: As one of the performance indicator for this action is the Number of Red Lists completed, should the National Biodiversity Data Centre be included as one of the Actors/key players
30	Action 2.1.11 Comment Baseline on : Marine Institute has commissioned studies on fisheries
30	Action 2.1.11 Enhance knowledge of the most significant direct and indirect causes of biodiversity and ecosystem ..... It is considered that this action is far too general in its scope and perhaps should be broken into a group of related actions. Perhaps this would be more usefully tackled if broken into sectoral actions, e.g. agriculture, forestry, development & infrastructure, renewable energy, etc. Actions targeted on already known or suspected causes of biodiversity loss, such as inappropriate grazing levels, could be usefully made more specific. If such a breakdown is considered too detailed for a national plan, then the plan should require sectoral plans/policies (under action 1.1.1) to include actions on researching causes of biodiversity loss and mitigation measures.
30	Action 2.1.11 Regarding the prevention and mitigation options element, there is a scarcity of research providing evidence of effective mitigation measures. Research should be carried out reviewing ecological mitigation that has already been included in past projects and evaluating its effectiveness
30	Action 2.1.12 Continue forest research programme ... Where public funding has been used to produce reports, such reports should be published and made available to all. This is not currently the situation.

Page	Comment
30	Action 2.1.13 Observation: the Data Centre can contribute to delivery of this action, but it could only do this to a very limited extent assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22. However, the development of a national strategy to address this issue should be actively pursued, and should such an initiative be advanced, the Data Centre would be pleased to play its part.
30	With respect to Acton 2.1.11, should more or all Departments be included as Actors or key partners. Should there be Policy on this by all Departments. Should there be 'Policy coherence assessments' within Departments and their sections or among Departments
31	With respect to action 2.1.14, It would also be useful to support research on biosecurity measures undertaken when maintaining local authority hedgerows and to support policy in that regard.
31	2.1.14 A lot of hedgerow survey work has been undertaken by Local Authorities over the last 10 years. Many of these studies reported a decline in total length and quality of the hedgerows all over Ireland. Hedgerows are a relic of an agricultural past, when they were used to define boundaries, provide stockproof barriers, timber and food. This was at a time when labour was cheap and abundant. Hedgerows don't fulfil these functions anymore in a modern farmed landscape or in urban areas and management has become expensive. These factors have contributed to the decline of hedgerows nationwide. Supporting the capacity of the Local Authorities to monitor the ecological status of hedgerows will simply indicate more decline of the hedgerow resource in Ireland. This action is not enough the stop the decline of hedgerows and more practical conservation incentives and actions should be included in this plan. Actions such as research into alternative designs and management regimes of hedgerows and potential economic functions of hedgerows should be included. Similarly, financial incentives for private landowners to undertake hedgerow management should be explored. Under GLAS farmers can avail of grant support towards hedgerow management and it should be relatively easy to show the length of hedgerow managed under GLAS.

Page	Comment
31	<p>2.1.14 Support capacity of the Local Authorities to monitor the ecological status of hedgerows</p> <p>Given the fact that public authorities are already stretched and additional funding is unlikely to be easily obtained, it is perhaps doubtful that anything meaningful could be achieved under this heading. It lacks focus and strategy. Most LAs do not have a Biodiversity Officer and the Biodiversity Officers and Heritage Officers would might say that they are already overstretched. Additionally, have LAs the authority to enter private land to monitor hedgerows and if not will this action be restricted to roadside hedges?</p> <p>Since 2004 17 County Hedgerow Surveys have been conducted, predominantly commissioned through LA Heritage Officers. The LAs concerned should be complemented on their initiative. Only one County Hedgerow Survey was conducted during the term of the 2011-16 Plan*. This leaves 9 counties (in the south and south-east) that have no baseline data on the composition and condition of their hedgerows. There is no requirement in the plan for this data deficit to be rectified. At the very least this Action in the new plan should be for Hedgerow Surveys to be conducted in the 9 Counties where they have not so far taken place to ensure that there is baseline data covering the whole of the Country.</p> <p>No county that has conducted a hedgerow survey has undertaken a resurvey to assess any potential trends.</p> <p>This seems like an action that could be encouraged through coordinated action between the NBDC, eNGOs, community groups etc. This would make a very positive citizen science programme. What more could be done to boost the consideration to biodiversity-friendly hedges and roadside verges in the TidyTowns programme? This could be a hedgerow related- action.</p> <p>There needs to be a co-ordinated, structured and systematic national programme of monitoring hedgerow quantity and quality on an ongoing basis. Without a comprehensive knowledge base, it is difficult to achieve effective conservation management and sustainable use of biodiversity.</p> <p>The Hedge Layers Association of Ireland should be included in the Actors/Key Partners column.</p> <p>The fact that 'Woodlands of Ireland', a charitable trust set up by various branches of public authorities are included as a key partner under this heading instead of the HLAI or any of the numerous eNGOs who focus specifically on native woodland conservation indicates a worrying reluctance to meaningfully engage with grassroots level within this NBAP.</p>

Page	Comment
31	<p>2.1.15 Is there any particular reason why elasmobranchs are singled out for guidance documents instead of marine biodiversity in a more general sense or all annexed marine species for example? We suggest that a wider group of marine species be included in the guidance documents to cover at least all the marine species in the Annexes of the Habitats Directive.</p>
31	<p>2.1.15. Produce conservation guidance for fisheries sector, aggregates, offshore wind and other industries for mitigation of impacts on elasmobranchs</p> <p>This is positive. Effective conservation of elasmobranchs must be linked to MPAs which can support viable populations. A Threat Response Plan is needed for species like the Angel Shark.</p> <p>There is a need for increased awareness around the conservation status of Irish elasmobranchs including the global context and their importance from an ecological perspective.</p> <p>This action should be linked with the need to promote knowledge on the benefits of MPAs, ecotourism related to basking sharks and cetaceans being one example. According to a 2013 report angling is worth €755 million euro a year to the Irish economy. Sea angling (excl. Sea Bass) was ranked as the most popular form of angling in terms of participation, in 2012. The direct value of elasmobranchs from an angling perspective should be strongly emphasised when promoting the opportunities MPAs present to coastal communities.</p>
31	<p>2.1.16 This action lacks detail on the scale of the action and the work involved. How many taxonomic groups still have not been dealt with and what taxonomic groups are to be prioritised for red list assessment (ideally with an indication which year that group would be completed)? This makes the performance indicators a lot clearer and relevant and will give a more concise description of the work involved for DAH and the NBDC.</p>

Page	Comment
31	<p>Action 2.1.13</p> <p>It is noted that CIEEM is mentioned under Action 2.1.13.</p> <p>CIEEM is the professional representative body of ecological practitioners who are working daily with the recording and evaluation of biodiversity, including within the context of planning and development.</p> <p>It would have been useful if CIEEM were represented in the Working Group perhaps, to input to the draft document prior to the public consultations stage?</p>
31	<p>Action 2.1.14 Observation: Assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22, the Data Centre would have very limited capacity to assist effective delivery of this action without additional resources.</p>
31	<p>Action 2.1.15 Observation: The Data Centre would need clarification on exactly what is envisaged under this action, as we would consider the production of conservation guidance, if it were to relate to conservation management, as being outside the remit of the Data Centre.</p>
31	<p>Action 2.1.16</p> <p>Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22.</p>
31	<p>Action 2.1.16 Actors/Key Partners Add BWI, RSPB</p>
31	<p>Action 2.1.16 COLUMN 4 Comment: The text should be amended to reflect the new vascular plant red list I.E. This also applies to paragraph 1.2.4. And then there is Figure 4 on page 7. Should this be updated with the data from the moth and vascular plant red lists? NEW TEXT for 2.1.16 Red Lists have been published for macro-moths (2016)50, vascular plants (2016)76, mayflies (2012)21 etc. If that change is made, then you need to add the reference for the new Vascular plant list. It seems that this is most simply done by changing reference 76 from this</p> <p>76. Curtis TGF, McGough HN, Ireland S. The Irish Red Data Book 1 Vascular Plants. Dublin; 1988.</p> <p>to this [I don't think there is a need to retain the previous one in the reference list]</p> <p>76. Wyse Jackson, M., FitzPatrick, Ú., Cole, E., Jebb, M., McFerran, D. &amp; Wright, M. (2016) Ireland Red List No. 10: Vascular Plants. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Dublin, Ireland.</p>



Page	Comment
31	Action 2.1.16 COLUMN 4 NEW TEXT replace “, and vascular plants (1988) 76” with “, charophytes (1992) ref and vascular plants (1988, 2016) 76 ref”. Ref for charophytes = Stewart, N.F. & Church, J.M. (1992) Red Data Books of Britain and Ireland: Stoneworts. The Joint Nature Conservation Committee, Peterborough.
31	With respect to action 2.1.15, It would also be useful to have supportive policy or research or awarenessprogrammes of biodiversity positive beach sand stabilisation methods and biodiversity positive shoreline protection methods to mitigate against storm events. These could be targeted at local authorities and their elected members who may make rash or snap decisions after storm damage.
31	With respect to action 2.1.16, it would be useful to have an approved single website of red list species for all taxonomic groups, that is query-able and can print off results.
32	With respect to action 2.1.17, It would be useful to have additional actions and/or indicators for the creation and implementation of management plans and strategies for red list species.

Page	Comment
32	<p>2.1.17. Build upon Red List assessments to identify conservation priority species and identify knowledge gaps for those prioritised species</p> <p>This is very important. Conservation objectives and management plans for priority species should not be developed in isolation from other threatened species and habitats. This is happening and is an unintended consequence of legal obligations under the Habitats and Birds Directives. There is a strong overlap between the distribution of many threaten species, both with each other and with SAC, SPA, NHA designations. Conservation objectives should be complementary for as many species and habitats as possible. An example where this is not the case is where there is an overlap between Hen Harrier and Freshwater Pearl Mussel designations. To protect FWPM from commercial forestry buffers of native trees are planted as aquatic buffers. If Hen Harriers were also considered, greater unplanted forestry setbacks would be implemented to protect FWPM from run-off and create foraging and nesting habitat for hen harriers i.e. corridors of open habitat mixed with scrub and a belt of deciduous trees adjacent to commercial forestry. ☒</p>
32	<p>2.1.18 We would recommend that this action be removed. Ireland has a lot of multiple designations on sites already and we do not need another type of designation. The focus should be on proper protection and site enhancement in the sites currently designated before starting to add more jargon and classifications to key conservation sites.</p>
32	<p>2.1.18 COLUMN 4 COMMENT I think the cross reference in 2.1.18 should refer to 2.1.16</p>

Page	Comment
32	<p>2.1.18. Identify and map nationally important Key Biodiversity Areas (KBAs) of Ireland's terrestrial and marine territories, including Ecologically or Biologically Significant Marine Areas (EBSAs)</p> <p>This is extremely important. This must look beyond Natura 2000 designated sites and include if possible habitat stepping stones/corridors. Increased knowledge of marine habitats and species distribution is critical.</p> <p>This is an action that should be carried out in coordination with Northern Ireland. Wildlife does not recognise territorial borders. An all-Ireland approach to conservation should be pursued over the life-time of this NBAP. An all island approach to conservation would be in line with the aspirations set out by the Good Friday agreement. Close cooperation in order to preserve and enhance the wellbeing of our shared environment and natural heritage is in the interests of all of the people on the island of Ireland and the many species which share our territories.</p>

Page	Comment
32	<p>2.1.19. Implement biodiversity-related action from the Climate Change Adaptation Strategy and prioritise needs for research (and conduct it) into the mechanism and impacts of climate change on biodiversity including resilience of protected areas, green and blue infrastructure, and ecosystem restoration.</p> <p>The draft version of the Climate Change Advisory Council's 'First Report' does not contain a single reference to biodiversity and word environment mainly refers to the built environment and the climate role of the Environmental Protection Agency. It is vital that Ireland's attempts to adapt to and mitigate climate change do not become another pressure on biodiversity and the environment. National objectives for renewable energy and carbon sequestration must take biodiversity into account.</p> <p>Climate change also makes a compelling case for the conservation of habitats which perform a carbon sequestration role. Given the high conservation value of Ireland's peatlands and the multitude of ecosystem services they provide, including carbon sequestration their ongoing destruction is not justifiable. The recommendation of the EPA BOGLAND report must be implemented. All industrial extraction of peat must end as soon as is feasible. All cutover bogs should be rehabilitated to reduce rates of carbon oxidation and enhance biodiversity and water quality.</p> <p>We have made some specific points at the start of objective 2 on the biodiversity impact of forestry and the need for research into the impacts of climate change on biodiversity.</p> <p>Research has shown that climate change is already impacting on many species and habitats in Ireland and the UK. In many cases, it is acting as an additional pressure on species and habitats which have already been experiencing a decline in their conservation status for many decades. Global warming and other impacts of climate change will continue to occur even in the absence of more greenhouse gas emissions over the coming century. It is therefore critical that other pressures on biodiversity, such as habitat loss and degradation are addressed. Large protected areas and populations are more resilient to change. The relevance of achieving good conservation status for habitats and species across the Natura 2000 network and ensuring that there are linkages throughout the network will become even more important as the natural world undergoes a climate driven upheaval.</p>

Page	Comment
32	2.1.20 This action should be much more specific. What monitoring programs should be set up to collect key information to inform policy Ireland? A much clearer focus should be provided in terms of which species or habitats are a priority in a national context. This would allow interested organisations to take a lead on this and they can apply for funding from various sources in the knowledge that they are addressing one of the actions in the National Biodiversity Plan. The likelihood of obtaining funding for a monitoring scheme from the Heritage Council, LEADER, FLAG, Interreg etc is much higher too.
32	Action 2.1.16 Baseline add BoCCI 4 due 2017 (4th All-Ireland Assessment)
32	Action 2.1.17 Actors/Key Partners add BWI, RSPB NI.
32	Action 2.1.17 Build upon Red List assessments .... Red list endangered animal species should be added to a fauna protection order
32	Action 2.1.17 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22.
32	Action 2.1.17 Perhaps consider the publication of national / provincial / regional lists of priority species, similar to the approach used in Northern Ireland?
32	Action 2.1.18 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22.
32	Action 2.1.19 Actors/Key Partners add BWI
32	Action 2.1.20 Actors/Key Partners add BWI, ISS,
32	Action 2.1.20 Observation: the Data Centre can contribute to this action in only a limited way, assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22. However, there is enormous potential to expand the network of long-term monitoring schemes to meet key policy needs, such as climate change, landuse change, sustainable development etc. The Data Centre is ideally positioned to deliver a wide range of monitoring scheme, in collaboration with its partners, scientifically structure and delivered in a very cost-efficient manner. The extent to which this can be done will be directly related to the additional resources provided.
32	Action 2.1.20- Actors and Key Partners:Remove DAFM- Not an action for DAFM commitment

Page	Comment
33	2.1.21 Coastwatch should be added as a key partner given that they have been running the Coastwatch survey for many years.
33	<p>2.1.21. Conduct research into the threat posed to Ireland's marine biodiversity by marine litter including microplastics, ocean acidification and noise</p> <p>The threat posed by marine litter is well established. The money would be better spent tackling marine litter through regulation and education. Certain types of plastic should be banned. Clean Coasts have been running a campaign for several years calling for a ban on microbeads. France has recently introduced a ban on disposable plastic cutlery. We need to move towards a circular economy. Improving recycling facilities and options in line with other continental European countries should be targeted. ☐</p>
33	2.1.26 It is recommended that the priority habitats and species for which projects should be developed are listed in the plan. This will give all potential partner organisations a clear indication where action is required and they may be in a position to develop a LIFE project with or without assistance from DAH.
33	Action 2.1.21 ACTORS KEY PARTNERS NEW TEXT Academia and Research Institutions, DAH, EPA, SFI, Marine Institute DHPCLG
33	Action 2.1.21 BASELINE NEW TEXT: Pilot study of seabird ingestion of plastics in Irish waters published77
34	<p>2.1.23. Review priorities for restoration of habitats and species in Ireland and develop a programme of restoration activities for priority biodiversity</p> <p>The reintroduced Golden Eagle population is in a serious condition. Letting the species go extinct twice in Ireland is not acceptable.</p> <p>Habitat restoration should be prioritised where there is a dual benefit for threatened species. For example, raised bog restoration will benefit species like curlew and red grouse.</p> <p>The programme for restoration activities should include communities as elaborated on above.</p>

Page	Comment
34	<p>2.1.24 It is strongly recommended that the second part of the action be removed from the text (and as an source of revenue for biodiversity conservation and restoration). Given that the Irish Nature Conservation efforts have been underfunded for decades, this could lead to a further reduction of state expenditure on nature conservation. All nature conservation funds could come from projects that have lead to a loss of biodiversity and we do not see how that will achieve a no net loss situation.</p>
34	<p>2.1.24. Explore biodiversity offsets as a means to achieve no net loss of biodiversity under this Plan and as a source of revenue for biodiversity conservation and restoration</p> <p>The onus of protect existing habitats and species should not be weakened by biodiversity offsetting. If environmental damage is inevitable due to approval of a project of over-riding public interest then proper mitigation measures should be implemented. The current use of mitigation measures in Ireland is extremely poor. The option of mitigating damage should not be used as an excuse not to take biodiversity impacts into account during project design.</p> <p>The planning system in Ireland now focuses almost exclusively on Natura 2000 impacts with far less attention being paid to what the actual site level impacts are on biodiversity.</p>
34	<p>2.1.25. Explore areas/instruments and tax enablers that could be developed to precipitate biodiversity/conservation project funding by the private sector</p> <p>Potentially positive ideas in this case would be to place a carbon offset levy on flights and reinvest this in peatland restoration or native woodland establishment, for example or reinvest revenue from water charges back into source water protection. These kinds of strategies would entail a proper implementation the polluter pays principle across society and reinvest the revenue into environmental rehabilitation and enhancement.</p>

Page	Comment
34	<p>2.1.26. Explore the options of using the LIFE Programme to enable projects implementing the EU Biodiversity Strategy and this Plan</p> <p>Greater levels of funding should be drawn down from the EU for restoration if possible. This should be considered in the context of Brexit. Many ongoing LIFE projects in the UK are targeted at upland peatlands and other habitats with a North Western distribution in the EU. If the UK does leave the EU then Ireland will contain an even more significant proportion of the EUs total distribution of certain habitats and species. This will only strengthen the case for more investment to properly conserve these habitats and the species they support.</p>
34	Action 2.1.21 NEW TEXT Conduct research into the threat posed to Ireland's marine biodiversity by marine litter including microplastics, ocean acidification, noise and light
34	Action 2.1.22 Performance Indicators Remove text and replace with 1. Updated marine research strategy
34	<p>Action 2.1.23 Review priorities for restoration....</p> <p>The review should include restoration methods and the knowledge base with improving these as a key part of the follow-up programme.</p>
34	Action 2.1.26 Under the PI include amount of funding also?
34	Action 2.1.26: Although the HC is listed as a partner here it is without a wildlife officer and as such is not in a position to make any meaningful contribution in this area.



Page	Comment
34	<p>New Additional Action 2.1.27</p> <p>Build capacity at local community level to manage biodiversity. Builds on locally led EIP model of DAFM. Suggested Indicators: Number of EIP type biodiversity projects; “Learning” network of local biodiversity initiatives established. Support knowledge sharing and dissemination across EIPs- this role that is currently assigned to National Rural Network for EIPs by DAFM under current RDP. (Note: this action may be appropriate to incorporate in some way under existing actions in objective 3)</p> <p>For details on EIPs see <a href="https://www.agriculture.gov.ie/farmerschemespayments/europeaninnovationpartnershipincludinglocallyledschemes/locallyledschemes/opencallforproposalsundertheeipsinitiative/">https://www.agriculture.gov.ie/farmerschemespayments/europeaninnovationpartnershipincludinglocallyledschemes/locallyledschemes/opencallforproposalsundertheeipsinitiative/</a>.</p>
34	<p>Regarding Objective 2.1.26, capacity-building events such as the upcoming EU LIFE Programme Information Day are welcome. The INTERREG Programme should also be explored and similar events provided.</p>
25/26	<p>5th Paragraph: advance the concept of ‘apprentices’ for difficult groups, i.e. where a trainee can work alongside a professional for [say] 2 years to develop their skills, an outcome which cannot be achieved by sending a trainee on a week’s course. [This concept has been successfully trialled by the British Lichen Society in cooperation with Scottish Natural Heritage.] Might NPWS support equivalent schemes for certain taxonomic groups?</p>
29 & 55	<p>Regarding Objectives 2.1.9 and 5.1.3, DBBP can commit to being an actor/key partner. DBBP will support volunteer recorders and Citizen Science projects from 2017-2020 by hosting training events, promoting participation in events and surveys and by producing supporting materials. The performance indicator is the number of projects supported where data is gathered by volunteers/citizen scientists. For example, DBBP hosts NBDC training workshops and supports the Coastwatch Survey by hosting events, promoting participation in the survey and printing supporting materials. From 2017-2019, DBBP will fund and provide additional supports for a BirdWatch Ireland Citizen Science project to gather data on Brent Geese numbers and feeding locations.</p>

Page	Comment
30-31	Action 2.1.13 Enhance the capacity to build and maintain the humanresources, systems ..... Loss of taxonomy skills are severe and will not be balanced by identification skills, and identification and taxonomy should not be confused. Funding of taxonomic specialists and museum resources are important to prevent the continuation of the decline in this speciality. Collaboration of funded postgraduate projects through museums with third level institutions would help.
30-31	Action 2.1.13 Similarly loss of identification skills. Note that CIEEM provides training courses to members and non-members on a range of ecological and environmental management subjects including species identification and management.
30/31	Action 2.1.3: same suggestion as under Page 25/26, para 5 above.
31-32	Action 2.1.16 Red Lists for vascular plants was published in 2016, but elasmobranchs not? Others?
32-33	Action 2.1.20 Expand the network of long-term monitoring schemes to enable tracking ..... There is currently no mechanism for funding the continuation of long term datasets. As a consequence very valuable continuity on sites such as Pollardstown Fen has been compromised. A list of long term sites should be prioritised and used in international collaborative studies and be available for prioritisation of funding. Suggest NRA, Local Authorities be added to the key players for this
email	It is noteworthy that the above projects will also assist in achieving objectives 2,3 and 4 so strengthening the knowledge base, increasing awareness and conserving and restoring ecosystem services in the wider countryside. 1. ILI would be willing to assist in achieving these objectives and are available in order to assist the NPWS through our BGI WG and linkages to IFLA.
Survey Monkey	1. Increase enforcement and improve reviews of transgressor of regulations (ie, felling license follow up). 2. Improve education and awareness, regulations and maintenance of road side tree/hedgerow pruning and cutting (ie, ensure appropriate cutting times, flail blade maintenance and proper tree practices are in place). Poor practice is not only unsightly but weakens the genetic strain and invites decay and future damage

Page	Comment
Survey Monkey	2.2.1 We welcome a review of the needs for biodiversity research in 2019. However, the plan does not indicate where the budget will come from for any potential research. This should be clarified.
Survey Monkey	As stated in the draft plan, access to data and the best available up-to-date information is essential for evidence-based decision-making by policy makers, planners and others. Due to the costs of surveys, indicator and priority species should be targeted in regard to data collection. Such surveys should also be carefully planned to provide a suitable representation of the state of each habitat/ species. Finally, it is essential that all data and research collected via public funds is provided to the National Biodiversity Data Centre and available to best inform policy decisions.
Survey Monkey	Do you have feedback on Objective 2 and its actions? Manage our Hedgerows in a more Sustainable Way
Survey Monkey	Greater co-ordination and national oversight is required to target limited resources towards strengthening the knowledge base for conservation management and sustainable use of biodiversity. Priority actions should be targeted at habitats and species at poor-bad conservation status.
Survey Monkey	I agree with the monitoring of species, it is something that can involve a lot of people in these areas and be coordinated and recorded effectively by a publicly funded organisation (that already exists such as biodiversity ireland).
Survey Monkey	I support the objective.
Survey Monkey	Ireland has been found in the past to be in breach of EU law for failing to protect our environment, failing to ensure that aquaculture projects were likely to have a significant harmful effect on our natural habitats. Please note a "copy and paste" format saying that a study has been carried out and there will be environmental impact is wrong! is madness! Can you please stop this destruction by oyster farming of our coastal areas
Survey Monkey	It is essential that we understand fully what we have in Ireland, what the actual threats to biodiversity are and how we can avail of natural resources without depleting them
Survey Monkey	It will only work if education in primary and secondary schools include a biodiversity program that is outdoor based.

Page	Comment
Survey Monkey	Knowledge of biodiversity and ecosystem services has substantially advanced our ability to ensure conservation, effective management and sustainable use, BUT NOT at the Cost of the Irish People.
Survey Monkey	Not sure why a national vegetation classification scheme is 3 years away? Surely it can be turned around sooner. Is there a connection made between knowledge base and integrating it into Objective 1?
Survey Monkey	NPWS in particular needs to work much harder to build stronger and better functioning relationships with all sorts of other groups which have interest in biodiversity. This needs to be included somehow in this doc. These groups would incl NGOs, local interest groups, and many others. Trying to build more and better relationships, with clear objectives, has to be a priority. It could be win-win, with just a little effort and planning!
Survey Monkey	The BSBI fully supports this objective.

Page	Comment
Survey Monkey	<p>The Irish Seed Savers Association is a national charity focused on the conservation of agricultural crop diversity (many varieties of each food crop). We are the only such organisation covering all food crops (fruit, vegetable and grain). Our gardening staff comprises only one full-time gardener and 6 part-time). We receive welcome funding from DAFM to support our work (according to Key Performance Indicators assessed on an annual basis). However, despite this funding we struggle to retain staff due to low wages. Therefore, maintaining a strong knowledge base for conservation management is under threat. We require increased funding in order to provide more stable, long-term employment and better knowledge retention. Conservation of domesticated varieties requires specialist knowledge, skills and equipment - different to that of conservation of natural habitats and species. Therefore, this particular objective requires additional funding to ensure strength for the knowledge base for conservation management of domesticated 'genetic resource' biodiversity. There must be long-term monitoring of agricultural 'genetic resource' biodiversity to generate data that tracks change over-time to assess success or failure (annually: variety grown, land area, location, estimated harvest data, conservation status of named variety (eg: very rare to common, heritage Irish or other origin, relative genetic importance/uniqueness of variety). Such recording of agricultural crop diversity could be included as part of 2.1.8 and or 2.1.9. ISSA has a network of supporters who grow unusual crops and provide feedback (variety, area or quantity grown, yield, notes on characteristic eg relative disease resistance, vigour, quality, taste, etc). We are interested to work with other relevant national bodies to contribute to this goal.</p>
Survey Monkey	<p>The projects identified in our comments on Objective 7 will also assist in achieving the respective themes in Objectives 2</p>
Survey Monkey	<p>Very important. We also need to improve knowledge of biodiversity within our universities and within adult education. Biodiversity officers within each county would be excellent. An NPWS officer should be assigned to An bord Plenala.</p>
Survey Monkey	<p>We suggest that detailed surveys of lichens are made at old mine sites in western Ireland, including Ross Island and Muckcross, Co. Kerry; Allihies, Co. Cork; and Silvermines, Co. Tipperary. These sites were recommended by Howard Fox in 1999 (Fox, H., 1999. Lichens of three mine sites in Co. Wicklow, Ireland. Proceedings of the Royal Irish Academy Vol. 99B, No.1, p.67-71).</p>

Page	Comment
Survey Monkey	We welcome other measures of national success the GNP and the measurement of National capital. The importance of biodiversity for the survival, health and health being for all people and communities. All EU environmental legislation must be enacted and monitored across all sectors.
Survey Monkey	Where will the money come from to strengthen the knowledge base. Also village pump politics and politicians will always give way to the local electorate.
Survey Monkey	Yes - our knowledge base can only be retained and strengthened if there is a long term means of storing and managing biodiversity data. The current short term programme for the National Biodiversity Data Centre is unacceptable, the Centre must be placed on a more secure and long term platform.
Survey Monkey	You reference the HLAI/ Woodlands of Ireland produced Hedgerow Appraisal System, you reference the 15 completed County Hedgerow Surveys almost all produced by HLAI founder and Chairman Neil Foulkes yet fail to include the HLAI in your Key Actor section. There also seems to be no intention to complete even one more hedgerow survey to complete the database, this is very worrying.
	<p>Below lists some of the objectives, targets and actions from the draft 3rd National Biodiversity Action Plan that SECAD is happy to support. The implementation of some of those listed SECAD through its current and planned activities, is already contributing to or plans to contribute to on the ground. SECAD would welcome the opportunity to contribute to implementing other actions and would</p> <p>welcome input on how we could do so from parties involved in developing the 3rd National Biodiversity Action Plan</p> <p>TARGET 2.1: Knowledge of biodiversity and ecosystem services has substantially advanced our ability to ensure conservation, effective management and sustainable use by 2021.</p> <p>TARGET 2.1: Knowledge of biodiversity and ecosystem services has substantially advanced our ability to ensure conservation, effective management and sustainable use by 2021. ACTION 2.1.14 Support capacity of the Local Authorities to monitor the ecological status of hedgerows.</p>

Page	Comment
	<p>COMMENT In relation to Objective 2 we have, over recent years, invested considerably in updating baseline ecological records for lands under our remit. For example the Grand Canal, Royal Canal and Barrow Navigation were extensively surveyed by the OPW in the early 1990s. Waterways Ireland has updated all these records, as well the Shannon-Erne Waterway, to recognised best practice. This extensive body of data is readily available to the public and other State Agencies and this year we will be donating the entire GIS component to the National Biodiversity Data Centre for inclusion on their public GIS webviewer (Action 2.1.2 &amp; 2.1.4). In addition, we also recognise the considerable volunteer resource that exists along the waterways which could be harnessed to further collect important biodiversity related information (Action 2.1.9). In this regard we grant aided 19 groups in 2016 as part of our Heritage in the Community Grants scheme. An allocation of €20,000 has been ring-fenced to continue this scheme in 2017. Waterways Ireland is also actively investigating a number of projects/collaborations to access EU Life funding (Action 2.1.26) to undertaken biodiversity related research, but has been unable to progress this work due to a lack of matched funding and welcomes the coherent approach National Biodiversity Action Plan will provide.</p>

Page	Comment
	<p>Comment: Many policies and much scientific data referenced in the plan are out of date. For example, since the evaluation of terrestrial mammals in the All- Ireland Red Data List for Mammals (Marnell et al., 2009), we know of at least new three introduced species. One of these species has been subject to intensive research (e.g. Montgomery et al., 2012; McDevitt et al., 2014) which demonstrates serious negative impacts over rapidly expanding areas. This research is in the peer reviewed scientific literature and should be included and assessed within the plan. Another instance of</p> <p>out-dated research is the reference to the old red-list for vascular plants (Curtis &amp; McGough, 1988), when a new list has been recently published (Wyse-Jackson et al., 2016)..</p> <p>The draft Plan should update all policy and scientific references, and review relevant scientific literature. Individual consultations with technical experts on relevant species and habitats within the National Parks &amp; Wildlife Service would no doubt be an efficient means of identifying the academic publications of key importance.</p> <p>Comment: Without substantial and immediate increases in research funding and closer collaboration between academia, government and Non-Governmental Organizations (NGOs), the Association does not believe policies will be supported by accurate, up-to-date data. This may contribute to the continuing pattern of failure regarding the aim of achieving favourable conservation status of species and habitats.</p>



Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Objective 3	
Page	Comment
40	Action 3.1.11 - We recommend adding the following: Provide support, education and training opportunities necessary to inform local communities about biodiversity in their area and engage them in activities to promote biodiversity to enable them to act as useful local monitors of environmental change. This could be done in partnership with agencies and NGOs such as Birdwatch Ireland, Irish Wildlife Trust, NBDC and NPWS. Another performance indicator for this Action would therefore be “Number of partnerships with local, regional and national environmental organisations” and “Number of activities and events organised.”
	Action 3.2 – In order to enhance communication and co-operation between relevant sectors in support of biodiversity, we suggest a conference or information day be held inviting all sectors to participate and spending a portion of the day engaged in round table discussions to provide feedback on how these different sectors can be better enabled and supported to cooperate and interact. This could be an annual event with biodiversity conservation as the uniting feature.
37	In Action 3.1.6. CWF suggest instead of a 'competition' as stated, should look at 'acknowledgement' in the form of a biodiversity flag similar to the Green Flag or Blue flag for beaches.
36	Target 3.1.1 relates to consultation with local communities. The Association strongly recommends more specific PI's than the vague “consultation with community groups” provided. We further propose that specific stakeholders are named and targets for geographic spatial coverage are provided
39	With respect to action 3.1.9, DAFM is missing as a key actor and there is no performance indicator present. it would be useful to have performance indicators here. May I suggest indicators for ministerial level involvement leading by example. Indicators could refer to media events, radio tv. It could also refer to financing fun activities such as biodiversity competitions (pub quizzes) for local farming communities or bus trips for biodiversity hotspots. Activities could include prizes to farming landowners who act as 'local champions for wildlife' or 'local red-list champions' for local champions for poorly regarded wild species.

Page	Comment
Survey Monkey	<p>1. Increase enforcement and improve reviews of transgressor of regulations (ie, felling license follow up).</p> <p>2. Improve education and awareness, regulations and maintenance of road side tree/hedgerow pruning and cutting (ie, ensure appropriate cutting times, flail blade maintenance and proper tree practices are in place).</p> <p>Poor practice is not only unsightly but weakens the genetic strain and invites decay and future damage</p>
35	<p>2nd Paragraph NEW TEXT :Increasedawareness and understanding of biodiversity issues will beimportant to increasing proactive behaviour and buy-in to...</p>
36	<p>3.1.1 This action should be implemented as part of a Local Biodiversity Plans and we have reservations whether this is an action for a national biodiversity plan and whether the DAH has the capacity in terms of human resources to deliver this action.</p> <p>The performance indicator for this action can not be measured in any meaningful way and we would therefore suggest to remove this action from the Plan. Should the action stay, we would suggest to move this action to the Local Biodiversity Plan reviewing, updating and implementation.</p>
39	<p>3.1.10 We suggest that the key plants that are targeted by this action, be described in this action so that it is clear for the horticultural and wetlands industry what is required of them. Also, the ILI, Engineers Ireland, Local Authorities and the NRA should be key partners in delivering this action.</p>

Page	Comment
39	<p>3.1.10. Increase awareness within the horticultural and constructed wetlands industries of native alternatives that can be used in place of invasive species</p> <p>Greater efforts should be made to ban the sale of invasive species in Ireland. In particular aquatic invasive species currently being sold in garden centres should be targeted as a matter of urgency. Rhododendron and laurel should be banned as a landscaping plant on public lands.</p> <p>Native flora should be given preference when carrying out landscaping on public lands.</p> <p>Legislation should also be brought forward to stop the sale of plants identified as being invasive.</p>
40	<p>3.1.11. Provide support, education and training opportunities necessary to inform local communities about important biodiversity in their area and to enable them to act as useful local monitors of environmental change</p> <p>Again, eNGO's and community groups must be considered as important actors/key partners under this action. Existing community groups and forums must be utilised to better effect. DAH should continue to support eNGOs and educational institutions to coordinate citizen science and environmental monitoring. The DAH should look to utilise online training more effectively. This should be part of a wider initiative to increase the online presence of the NPWS.</p> <p>While locally-led agri-environmental schemes have huge potential for engaging the farming community they are less likely to be successful in mobilising the broader rural and urban community.</p> <p>While farmers are key partners, the majority of the Irish population are not employed in farming and should not be ignored.</p>

Page	Comment
36	<p>3.1.2 Improved communication and cooperation between all relevant groups and sectors is much welcomed. It may be one of the most important actions in this plan, but also one of the most time consuming. It is unclear however, which agency takes the lead on this action and how it will be resourced over the plan period. This should be indicated in the plan. It may be more appropriate to develop one overall outreach strategy and communication plan for nature conservation in Ireland first. This should be developed in conjunction with all relevant stakeholder groups, clearly setting out targets and indicating which organisation is going to do what action. This would then provide a blue print for the nature outreach work done by all stakeholders involved over the next 5 years. Such a campaign can include a Get Kids Out day and/or a national practical nature conservation day, both of which are run annually in the Netherlands for example.</p>

Page	Comment
36	<p>3.1.2. Enhance training, communication, cooperation and concerted action between relevant sectors in support of biodiversity conservation</p> <p>It is positive to see the inclusion of the IEN in actors/ key partners.</p> <p>The funding provided to eNGOs to carry out actions around Biodiversity Week has been very successful in delivering the performance indicators:</p> <ol style="list-style-type: none"> <li>2. Visits to natural heritage attractions</li> <li>3. Number of biodiversity-related day events and number of Irish people involved.</li> </ol> <p>An Taisce and other eNGOs often hold biodiversity excursions and events. The NPWS could support the eNGOs by hosting more lectures and guided walks in National Parks and important sites for biodiversity.</p> <p>Communication and cooperation between relevant stakeholders should continue to be facilitated by the NPWS through initiatives such as the Consultative Committees on the Hen Harrier Threat Response Plan and the Peatlands Council. The range of stakeholders should be expanded to include farming representatives of hill farming and marginal farming communities.</p> <p>The failure of Minister Heather Humphreys on numerous occasions to meet with eNGOs on the Heritage Bill or to respect the weight of opinion and scientific fact presented in the public consultation on the same should be reviewed considering the objectives and actions of the NBAP to enhance communication and cooperation.</p> <p>As the baseline column suggests this action would benefit from more strategy and coordination.</p>

Page	Comment
37	<p>3.1.3. Raise awareness in private sector organisations of impacts and dependencies on biodiversity and ecosystem services</p> <p>An Taisce often works with businesses on conservation action days or litter picks as part of their Corporate Social Responsibility. Corporate Social Responsibility (CSR) is a concept whereby enterprises integrate social and environmental concerns into their mainstream business operations on a voluntary basis. It is a sustainable business model which maximises the creation of shared value through collaboration with all stakeholders.</p> <p>An action could be taken to try to encourage CSR and actions which are beneficial to the environment. We have used Earth Day as a good option to work with businesses on their CSR.</p>
37	<p>3.1.4. Build public awareness and communications training into Biodiversity Research so that scientists and other stakeholders are empowered to communicate their findings and perspectives to a wider audience</p> <p>An Taisce would strongly support this point.</p>

Page	Comment
37	<p>3.1.5. Support radio, TV, web-based and other media products that emphasise or are centred around showcasing biodiversity, its importance, and current or future challenges</p> <p>Funding should continue for effective programmes like Living the Wildlife, Eco Eye and Ear to the Ground.’ New shows targeted at younger audiences should also be commissioned. It would be beneficial if public broadcasting agencies, commissioned more Wildlife documentaries independent of public authority funding. The BBC natural history unit produces some of the BBC’s most popular shows out-competing a broad range of programmes with its viewer ratings.</p> <p>Similar programmes to Spring Watch and Autumn Watch should be trialled in Ireland.</p> <p>Greater efforts should be made to engage with farming media platforms which can often portray environmental issues in a biased and unfavourable light.</p>
37	<p>3.1.6 Although we would welcome a Biodiversity Awards initiative, it may be more appropriate to get biodiversity awards included in existing awards such as LAMA, IBEC, Failte Ireland etc. This would help to raise awareness of biodiversity in different sectors and what they can do for biodiversity conservation.</p>
37	<p>3.1.6. Establish an island-wide Biodiversity Awards initiative where local, sectoral and educational projects or groups with a “biodiversity enhancement” focus compete for innovative prizes that will support their on-going work and provide a springboard for public awareness and participation</p> <p>An Taisce would strongly support this innovative idea. The comments made above, under point 2.1.18. about the need for an all island approach to conservation are relevant here.</p>


Page	Comment
38	<p>3.1.7. Work with relevant Government Departments and stakeholders to include biodiversity and ecosystem services in relevant courses in primary, secondary and tertiary level education</p> <p>The Environmental Education Unit (EEU) of An Taisce should be considered as a key partner under this action. As highlighted Green Schools play a vital role in raising awareness about biodiversity and the environmental. Green Campus and Neat Streets also work closely with tertiary and second level schools respectively.</p> <p>As mentioned above, the Environmental Education Unit of An Taisce is introducing the international Learning About Forests (LEAF) programme to Ireland, and has recently launched the programme in 33 schools in Limerick. The LEAF programme offers a well-defined, measurable model for the delivery of national and international policy and objectives for education and awareness about forests. The LEAF programme provides a structured approach to education and awareness of forests and has the potential to create a highly educated, informed and skilled population, translating into many associated environmental, economic and societal benefits through better understanding of forests and related disciplines.</p> <p>Back in the 90s, the ESSO Schools Wildlife Competition played an important role in getting primary school children actively involved in projects related to biodiversity loss. It would be beneficial if a similar competition was reinitiated. </p>



Page	Comment
38	<p>3.1.8. Develop and implement a communications campaign in support of public and sectoral understanding of the value of biodiversity and full implementation of this NBSAP</p> <p>The Irish Bioblitz and the National Biodiversity Week are growing in popularity every year. Increasing the duration over which biodiversity events could be hosted during National Biodiversity Week was a very positive step as it allowed eNGOs with limited resources to host more events and thus get more people involved in more parts of the country than would have previously been possible. Both the Irish Bioblitz and the National Biodiversity Week should continue to be supported and greater media involvement should be promoted.</p>
39	<p>3.1.9. Work with farming organisations and landowners to promote wider understanding of ecologically sustainable land use and the benefit to farmers of biodiversity, e.g. soil protection</p> <p>It is vital to work closely with the farming community on all issues relating to biodiversity conservation. The process of knowledge transfer is often a two way process and environmentalists can learn a great deal from farmers about the management of semi-natural habitats and about local biodiversity and changes in biodiversity regionally over time.</p> <p>The actors/ key partners list includes INHA. This would presumably rather refer to the INHFA. INHFA and other farming groups should be added to the traditional list of farming representation groups which are consulted on biodiversity issues.</p>
35	<p>5th Paragraph NEW TEXT: Building on the actions taken to date, further actions are tailored to key stakeholders</p>
Survey Monkey	<p>A greater understanding of the amazing benefits of Irelands plants and wildlife could be promoted by talks, positive advertising...a lot of this exists already; but seems to be thrown aside when a council is faced with the opportunity to build a new road or development instead of using their brains to find another solution!</p>

Page	Comment
36	<p>Action 3.1.1</p> <p>It's not accurate to state that "local communities are the ones who can most directly benefit from those ecosystems". Note the statement on Page 58 that "Protected areas are the primary source of drinking water for over a third of the world's largest cities". The local community may feel disadvantaged eg no sheep farming to protect drinking water supply.</p>
36	Action 3.1.1 Comment Baseline: Local communities are the ones who can most directly benefit from those ecosystem services
36	Action 3.1.1 Comment Performance Indicator 1: Consultation with community groups
36	Action 3.1.1 Include Local Authorities under Actors and Partners.
36	Action 3.1.1: This action requires clear objectives with identified deliverables a strategy and co-ordination – these should be part of the evaluation of this action. It is not clear why local communities alone should be consulted with to provide actions etc. The work of key eNGOS should inform this objective too.
39	<p>Action 3.1.10</p> <p>Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22.</p>
40	Action 3.1.11 Actors/Key Partners: Add eNGOs
40	Action 3.1.11 Baseline: Add BWI and IWT branches – provide education opportunities through talks/ events/ outings/ mentoring
40	Action 3.1.11 Include Local Authorities under Actors and Partners
39	<p>Action 3.1.11 Performance Indicator NEW POINT: 2. Engagement with academic ecologists to help provide relevant courses and seminars. ☒</p>

Page	Comment
40	<p>Action 3.1.11: Please include Heritagemaps.ie as a resource here. Please include the Irish Ramsar Committee here too. ADDITIONAL ACTION A FUND TO SUPPORT LOCAL GROUPS To support local groups in local area biodiversity enhancement projects with advice and financial resources . Effective work is being carried out at local level by a variety of local groups – gun clubs, tidy towns groups and others to provide biodiversity management,. This needs to be encouraged and maintained . The HC has supported a number of these over several years (see list at end of document) – It would be more effective if multi annual funding could be given too. ☐</p>
40	<p>Action 3.1.11. ‘Provide support, education and training opportunities necessary to inform local communities about important biodiversity in their area...’ must include the Heritage Council and the Heritage Officers as actors / key partners who need to be supported on an ongoing basis to develop and run local community biodiversity projects, as has successfully been carried out in the past in many counties but which has been curtailed by severe funding cuts over the past 8 years. The existence of Heritage officers, as recognised in Objective 1 and associated actions, is good, however their capacity to be effective at delivering actions is dependent on their ability to access biodiversity project funding, to implement training and outreach initiatives. Another performance indicator could be added here: ‘number of local biodiversity projects run in collaboration with Heritage officers’.</p>
40	<p>Action 3.1.11. ‘Provide support, education and training opportunities necessary to inform local communities about important biodiversity in their area...’ must include the Heritage Council and the Heritage Officers as actors / key partners who need to be supported on an ongoing basis to develop and run local community biodiversity projects, as has successfully been carried out in the past in many counties but which has been curtailed by severe funding cuts over the past 8 years. The existence of Heritage officers, as recognised in Objective 1 and associated actions, is good, however their capacity to be effective at delivering actions is dependent on their ability to access biodiversity project funding, to implement training and outreach initiatives. Another performance indicator could be added here: ‘number of local biodiversity projects run in collaboration with Heritage officers’.</p>

Page	Comment
40	Action 3.1.11. Provide support, education and training opportunities necessary to inform local communities about important biodiversity in their area and to enable them to act as useful local monitors of environmental change. 
36	Action 3.1.2 Actors/Key Partners NEW TEXT: Civil society organisations, eNGOs, Academia and Research
36	Action 3.1.2 Enhance training, communication, cooperation and concerted action ..... There is currently no strategic training for competent authorities undertaking Appropriate Assessment - poor biodiversity assessment skills by planning authorities are contributing to biodiversity decline. A strategy of ongoing training is needed. This may need to be a separate action but the lack of training in this area is a major source of damage and has resulted in a number of European complaints. A training strategy with a short deadline would be ideal to add.

Page	Comment
36	Action 3.1.2 identifies the Heritage Council as one of the actors yet the Heritage Council has not reinstated the position of Wildlife Officer for several years and currently does not have the capacity to participate in the delivery of this action. Notwithstanding action 1.1.3, which refers to Heritage Officers, restoring a Wildlife Officer to the Heritage Council in 2017 must be added as a specific action of the NPB in section 3. This role was in the past an excellent supporter of collaborative initiatives for nature conservation such as 'Networks for Nature' and did an excellent job of supporting biodiversity through the grants scheme which has been so severely curtailed in recent years. Heritage council funding was €1.969 million on 2012 and was €1.688 in 2015. This cut must be reversed and the wildlife officer role and wildlife grants must be restored to previous levels. Restoring wildlife grants funding to the levels they were 10 years ago is another action necessary to deliver this target and should be explicitly stated in the plan
36	Action 3.1.2 It is proposed that CIEEM be included in the list of Actors / key partners
36	Action 3.1.2 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22.
36	Action 3.1.2 Performance Indicators NEW TEXT: 5. Number of local community groups involved in conservation projects and/or surveys and monitoring programmes
36	Action 3.1.2: Action 3.1.2 identifies the Heritage Council as one of the actors yet the Heritage Council has not reinstated the position of Wildlife Officer for several years and currently does not have the capacity to participate in the delivery of this action. Notwithstanding action 1.1.3, which refers to Heritage Officers, restoring a Wildlife Officer to the Heritage Council in 2017 must be added as a specific action of the NPB in section 3. This role was in the past an excellent supporter of collaborative initiatives for nature conservation such as 'Networks for Nature' and did an excellent job of supporting biodiversity through the grants scheme which has been so severely curtailed in recent years. Heritage council funding was €1.969 million on 2012 and was €1.688 in 2015. This cut must be reversed and the wildlife officer role and wildlife grants must be restored to previous levels. Restoring wildlife grants funding to the levels they were 10 years ago is another action necessary to deliver this target and should be explicitly stated in the plan.
37	Action 3.1.3 Actors/Key Partners Add Sustainable Nation
37	Action 3.1.3 Performance Indicator NEW POINT: 3. Business awards for biodiversity engagement?

Page	Comment
37	Action 3.1.4 A potential performance indicator in relation to this could be the number of talks facilitated by academia/research institutions etc. that are aimed at the public?
37	Action 3.1.4 is particularly welcome; Mountaineering Ireland has a number of communication channels available, including a quarterly members' magazine the Irish Mountain Log, through which the findings of biodiversity research related to upland areas (e.g. the National Survey of Upland Habitats) could easily be shared amongst people with an interest in these areas. It is essential that such communications are engaging and targeted towards the audience.
37	Action 3.1.4 NEW TEXT: Academia and Research Institutions (not solely limited to these institutions)
37	Action 3.1.4: Action 3.1.4. 'Public awareness and communications training into Biodiversity Research' requires a performance indicator of the number of communications training seminars to post grad students working on biodiversity issues. Funding sources should be identified for this.
37	Action 3.1.4. 'Public awareness and communications training into Biodiversity Research' requires a performance indicator of the number of communications training seminars to post grad students working on biodiversity issues. Funding sources should be identified for this.
37	Action 3.1.5 Baseline ADD Living the Wildlife Eco_eye Wild Cities (RTE)
37	Action 3.1.5 Comment Action : Support radio, TV, web-based and other media products that emphasise or are centred around showcasing biodiversity, its importance, and current or future challenges

Page	Comment
37	<p>Action 3.1.5 Currently there is a high quality but low quantity of television and radio programmes with a biodiversity theme specific to Irish audiences and themes. Specific funding allocation is required to support biodiversity communication in Irish television and radio. Eco Eye is referenced as a baseline, however Eco Eye struggles to fund more than 2 biodiversity themed episodes each year, despite the high quality and audience reach of over 500,000 Irish viewers. A specific addition is required to this action to provide specific funding for documentaries and other factual radio programmes about biodiversity related themes on both national and local radio and national TV. Both direct funding to established operations and specific targets for coverage of natural heritage in Broadcasting Authority of Ireland (BAI) funding is needed.</p>
37	<p>Action 3.1.5 Currently there is a high quality but low quantity of television and radio programmes with a biodiversity theme specific to Irish audiences and themes. Specific funding allocation is required to support biodiversity communication in Irish television and radio. Eco Eye is referenced as a baseline, however Eco Eye struggles to fund more than 2 biodiversity themed episodes each year, despite the high quality and audience reach of over 500,000 Irish viewers. A specific addition is required to this action to provide specific funding for documentaries and other factual radio programmes about biodiversity related themes on both national and local radio and national TV. Both direct funding to established operations and specific targets for coverage of natural heritage in Broadcasting Authority of Ireland (BAI) funding is needed.</p>
39	<p>Action 3.1.7 Baseline :Add BirdWatch Ireland has developed workbooks for specific age groups which focus on birds of prey. These are currently focused on a limited number of schools but could be rolled out nationally. BWI – provides talks to schools on Garden Birds &amp; Making your own nestboxes/feeders etc.</p>
38	<p>Action 3.1.7 NEW TEXT Actors/Key Partners: Academia and Research Institutions, DAH, Dept. Education, An Taisce; eNGOs</p>
38	<p>Action 3.1.7 The current baseline is very primary school focussed which should be addressed</p>
38	<p>Action 3.1.7 Under Performance Indicator 2. Include Geography. Also it would be useful to evaluate the number of students studying ecology within biology.</p>

Page	Comment
38	<p>Action 3.1.7: Please note that the Heritage in Schools scheme is hosted, and funded by the Heritage Council. A briefing note is attached at the end of this table. Provide a scholarship through IRCHSS to research communicating biodiversity and public engagement. It is now clear that more research is needed to better understand how to engage the public in biodiversity conservation and how best to communicate with diverse audiences. Much of the use of existing information on biodiversity loss has a negative impact on the public and is not helping to achieve much needed goals. Further research on this to inform future plans would be of benefit to a wide range of stakeholders..</p> <p>Heritage in Schools, Forest Schools and Children and the Outdoors - briefing information. (action 3.1.7) Heritage In Schools is primarily focused on outdoor education and of its 175 specialists 70% are wildlife experts. In 2016 it carried out over 2000 school visits and engaged with over 800 primary schools. It is the largest outdoor education scheme in the country and it is not part of the Green Schools scheme as is implied in this section. With additional resources it could be much more effective in communicating the enjoyment and value of biodiversity to the next generation.</p> <p>Forest Schools also perform an important role for pre-school children and while still a relatively small group they are growing in reach and currently 75 pre schools are involved. Some acknowledgment and small resources could help this network become an important educator and communicator on biodiversity for young children.</p> <p>Children are increasingly cut off from the natural world in Ireland (Wild Child research 2010) despite the United Nations Committee on the Rights of the Child which outlines “that play should involve children having both space and opportunity to play outdoors unaccompanied in a diverse and challenging physical environment; opportunities to experience, interact with and play in natural environments and the animal world”. (Committee on the Rights of the Child 2013) and that a child’s education must be directed to the Outdoors. In Better Outcomes, Brighter Futures, the natural environment is recognised as</p>



Page	Comment
38	Action 3.1.8 Observation: the Data Centre is ideally placed to assist delivery of this action, and would be eager to work with the Department in delivery of this important action. However, any effective campaign would require dedicated resources that would be additional to a 'business as usual scenario' for delivery of the Data Centre's work programme 2018-22.
39	Action 3.1.8 Performance Indicator NEW POINT: 4. Online MOOCs, lectures etc dedicated web site?
39	Action 3.1.8 There is no measure on understanding. How will behavioural change be measured?
38/39	Action 3.1.8: include Burren in Bloom under 'baseline'.
39	Action 3.1.9 A potential performance indicator in relation to 3.1.9 could be the number of farmers in agri-environment schemes.
40	Action 3.1.9 Actors/Key Partners: Add BWI
39	Action 3.1.9 is also welcome, though it is concerning that no performance indicators have been attached to this action. Mountaineering Ireland suggests that agricultural advisers, both independent and within Teagasc, could in time become valuable partners in the delivery of this action, but that in the short-term there may be need to improve biodiversity awareness amongst the advisers themselves
39	Action 3.1.9 Work with farming organisations and landowners to promote wider understanding of ecologically sustainable land use and the benefit to farmers of biodiversity, e.g. soil protection
39	Action 3.1.9: This action should link to the National Pollinator plan and include the Federation of Beekeepers
39	Although soils are mentioned, there is no Performance indicator, and nothing under the baseline to indicate that soils will be addressed within this action.

Page	Comment
35	<p>An Iaisce would strongly agree with this passage;</p> <p>“Public engagement with biodiversity issues facilitates greater awareness of the full range of benefits from nature such as strengthening local grass-roots community initiatives, as well as increased educational opportunities, health benefits from community activities and direct exposure to nature, and realization that local business opportunities often rely on the provision of ecosystem services, including for instance, nature based tourism. So further action is needed in raising awareness of biodiversity, ecosystem services and the benefits of biodiversity investments to the economy and society. Awareness also needs to be translated into public support for decisions that are taken to look after wildlife (even when at the expense of a particular development).”</p> <p>There is an emerging awareness about the importance of engagement with the natural world, both from a mental health and child development perspective. This is an area where biodiversity would benefit from raised awareness. In 2012, the UK’s National Trust published Natural Childhood, a report by Stephen Moss, which examines the phenomenon known as ‘Nature Deficit Disorder’ and gathers current thinking on establishing a connection between children and the natural environment. The benefits of developing a healthy relationship with nature at a young age are manifold and fall broadly into four categories: health, education, communities and environment. Health benefits include a decreased risk of childhood obesity, improved physical fitness, improved mental health and even longevity. In one study, “exposure to nature improved symptoms of ADHD in children threefold compared with staying indoors. Exposure to the natural environment can reduce stress and aggressive behaviour in all children, and give them a greater sense of self-worth. Even short term ‘doses’ of nature can make a marked impact on mental health – indeed, as little as five minutes of ‘green exercise’ can improve mood and self-esteem by a significant margin.” From an educational perspective, child psychologist Aric Sigman concluded that “children exposed to nature scored higher on concentration and self-discipline; improved their awareness, reasoning and observational skills; did better in reading, writing, maths, science and social studies; were better at working in teams; and showed improved behaviour overall.”</p> <p>The positive impacts of exposure to a natural environment can be far reaching, for communities, wider society and the environment. “Studies have shown that even in cases where the only variable</p>

Page	Comment
36	As an action under 3.1 - Produce a 'Multi-Stakeholder Community Engagement in Biodiversity policy or guidelines' from an Irish perspective.

Page	Comment
	<p>Below lists some of the objectives, targets and actions from the draft 3rd National Biodiversity Action Plan that SECAD is happy to support. The implementation of some of those listed SECAD through its current and planned activities, is already contributing to or plans to contribute to on the ground. SECAD would welcome the opportunity to contribute to implementing other actions and would welcome input on how we could do so from parties involved in developing the 3rd National Biodiversity Action Plan.</p> <p><b>TARGET 3.1: Enhanced appreciation of the value of biodiversity and ecosystem services amongst policy makers, stakeholders, local communities and the general public.</b></p> <p><b>ACTION 3.1.1.</b> Consult with local communities to develop actions and performance indicators to help achieve the objectives of this plan.</p> <p><b>ACTION 3.1.2.</b> Enhance training, communication, cooperation and concerted action between relevant sectors in support of biodiversity conservation</p> <p><b>ACTION 3.1.3.</b> Raise awareness in private sector organisations of impacts and dependencies on biodiversity and ecosystem services</p> <p><b>ACTION 3.1.4.</b> Build public awareness and communications training into Biodiversity Research so that scientists and other stakeholders are empowered to communicate their findings and perspectives to a wider audience</p> <p><b>ACTION 3.1.6.</b> Establish an island-wide Biodiversity Awards initiative where local, sectoral and educational projects or groups with a “biodiversity enhancement” focus compete for innovative prizes that will support their on-going work and provide a springboard for public awareness and participation</p>

Page	Comment
	<p>COMMENT Increasing awareness and appreciation is core, in our belief, to the protection of biodiversity. Consultation and engagement with local communities (Action 3.1.1) was a central aspect of the development of our Heritage Plan and this approach has continued throughout its implementation. Awareness raising at primary school level is undertaken on a regular basis through our Education Officer who, with the aid of in-house expertise, delivers talks and educational campaigns that complement the Green Flag award run by An Taisce as well as tailoring programmes to complement the education curriculum in Northern Ireland and the Republic of Ireland (Action 3.1.7). The extensive body of updated ecological records that we have collected in recent years is also used to help local community groups and inform them about important biodiversity features in their area (Action 3.1.11). An action of our Heritage Plan was the development of biodiversity guidance for local community groups (e.g. Tidy Towns and Best Kept). This action was successfully implemented in Year 1 and is available to the public as an educational booklet but also highlights achievable community focussed projects that could benefit biodiversity along the waterways.</p>
Survey Monkey	Do you have any feedback on Obj 3 and its actions? Yes, by doing a competition in Schools

Page	Comment
Survey Monkey	<p>I am concerned to see no 'Performance indicators' or 'Baseline' in section 3.1.3. Mountain Research Ireland carries out a 'citizen science' project with mountainerrrs to record encourage awarenes of mountain biodiversity through a plant recording scheme. Under section3.1.6.: I welcome the use of Biodiversity awards. Mountain Research Ireland gives an award each year to a person in Ireland who contributes to Mountain Biodiversity recording and or, who is working for mountain biodiversity awareness, education, sustainable development or research.</p>
Survey Monkey	<p>I felt it was a pity that the marine environment, and ocean literacy was absent from this objective. We work with the Explorers Education Programme which is funded by the Marine Institute and I feel it should be noted in target 3.1.7 . The Programme will work with over 15,000 primary school students during 2017, from over 10 coastal counties around Ireland promoting ocean literacy and awareness of Ireland's marine biodiversity, See <a href="http://www.explorers.ie">www.explorers.ie</a> for more info. We also provide a number of marine biodiversity workshops to primary, secondary and tertiary students at the Galway Atlantaquaria, as do the other aquariums around Ireland. Zoo's in Ireland carry out a number of events that highlight Ireland's terrestrial biodiversity. I would love to have seen marine events such as World Ocean Day and Seafest mentioned in target 3.1.8 , which help engage with members of the public to Ireland's Marine Biodiversity and ecosystem services. Finally, in target 3.1.9, the marine sector is not mentioned. Sustainable use of the coastal environment needs to be</p>

Page	Comment
Survey Monkey	I fully support any plans or policies aimed at getting children, teenagers and their parents outside and educated about the biodiversity on their doorsteps. I see this as key to increasing awareness about local wildlife.
Survey Monkey	I support the objective.
37	In Action 3.1.5 more explanation needed on 'Biodiversity in our Wetlands'. CWF suggest an integrated 'Biodiversity Portal' for information, educational material, etc - could be the NBDC.
Survey Monkey	Increase funding for biodiversity week.
email	It is noteworthy that the above projects will also assist in achieving objectives 2,3 and 4 so strengthening the knowledge base, increasing awareness and conserving and restoring ecosystem services in the wider countryside. 1. ILI would be willing to assist in achieving these objectives and are available in order to assist the NPWS through our BGI WG and linkages to IFLA.
Survey Monkey	Last year I reported dumping in the clareen river in Ennis, first to the Epa then to Clare county council, a year later and the rubbish is still there, the EPA failed to act and the Clare county council refused to act, the rubbish is still there all be it most of it approx 20 + blag bags washed down river.
Survey Monkey	Let everybody know that Ireland is serious about biodiversity and protecting ecosystems - at the moment we are not serious, because there is disregard for wonderful habitats, coastal ecosystems and our wildlife. Please do not be so short sighted. We are destroying our beaches and natural habitats by granting huge numbers of licenses for oyster & fish farming around our coasts - reaping damage to our country on a scale unprecedented.
Survey Monkey	NPWS are under enormous personnel pressures and are striving to meet the daily needs and this affects the opportunity to provide education and positively and proactively educate on the value of biodiversity and ecosystem services. More staff to allow an opportunity for education is essential

Page	Comment
35	<p>Objective 3</p> <p>It is considered that the NBAP should include a commitment /action to require businesses (industries)which have substantial landholdings - to develop their own BAPs (where appropriate in accordance with specific industry sector standards / guidance such as the BAP requirements in the Oil and Gas Sector) and to adopt guidance for businesses in respect of biodiversity such as the All-Ireland Pollinator Plan Business Guide and Notice Nature biodiversity guidelines etc See also the above comment (comment 8) under Target 1.1 in relation to role for IBEC in this.</p>
Survey Monkey	<p>Objective 3 is supported by the LAHOs and reflects the significant work undertaken in this area at local level.</p> <p>However, there is a need to strengthen the link betweenraising awareness of biodiversity and delivering action for biodiversity at local level.</p>



Page	Comment
35	<p>Objective 3: Increase awareness and appreciation of biodiversity and ecosystem services</p> <p>From Mountaineering Ireland's perspective this is an extremely important objective with the Action Plan.</p> <p>There is a need for greater public awareness of the importance of biodiversity and how it underpins life.</p> <p>In many ways what is needed is a cultural shift, so that biodiversity is no longer seen as a barrier to development, or a means to sanction a landowner, but rather something that is respected as being of value to society. The greater emphasis on biodiversity within the Tidy Towns programme is helping to make this difference, as is increased wildlife programming on TV and radio; there is scope for more use of social media to build awareness and understanding of the value of biodiversity.</p> <p>Mountaineering Ireland believes that National Biodiversity Week has the potential to engage the general public with biodiversity, in much the same way that Heritage Week has done so successfully with heritage. Developing and promoting a comprehensive calendar of local events would seem to be key to this; Mountaineering Ireland suggests that the number of Biodiversity Week events be measured as a performance indicator under action 3.1.8.</p>
38	Objective 3.1.8 is urgently needed and should be expedited to 2018.
Survey Monkey	Perhaps we could start this in primary schools.
Survey Monkey	r a loveEnable better access to the countryside to foster a love of biodiversity: better right to roam ability and walking/cycle paths.

Page	Comment
40	Regarding Objective 3.1.11, DBBP can commit to being an actor/key partner (see 2.1.9 and 3.1.2 for details). Urban areas should be specifically mentioned here due to their large human populations.
36	Regarding Objective 3.1.2, DBBP can commit to being an actor/key partner. DBBP comprises three local authorities, the state agencies with responsibility for biodiversity and tourism development, and the commercial semi-state Dublin Port Company. Through its programme of awareness-raising and training events and projects such as Biosphere Discovery Tours, Comhairle na nÓg video and Dublin Bay Biosphere Conference: Connecting People and Nature, as well as the Dublin Bay Biosphere Biodiversity Conservation and Research Strategy 2016-2020, DBBP engages with varied stakeholders from local businesses, community groups, schools, universities, NGOs and the general public to promote joined-up action between different sectors in support of biodiversity conservation. DBBP's activities are communicated by means of our website, Facebook and Twitter profiles, Youtube channel, regular newspaper, TV and radio coverage and leaflets, flyers and newsletters that are distributed to public libraries. Regarding future actions, our programme of events and communication efforts are ongoing, a three year Biosphere Discovery Tours programme 2017-2019 is being developed and Dublin Bay Biosphere will host the EuroMAB Conference in 2019.

Page	Comment
Survey Monkey	<p>Schools aren't mentioned at all, which I think is both surprising and very disappointing. We have to include forward planning. We have to have biodiversity and appreciation of the value of nature embedded in our education system if things are to change in the future. At present there are some good initiatives, but coverage is extremely patchy, and often driven by the passion of individual teachers. We need a vision and a plan, with deliverables and accountability, to mainstream biodiversity education at all levels of our education system. This is a large section that I feel is glaringly missing here. NPWS needs to, immediately, set up (or hire in) a PR dept. It is one of the big reasons why we are in the situation we are in today in Ireland, with nature conservation being seen as in conflict with just about everything else – farming, development, local people, etc. Lack of communication and a wide-ranging, ongoing PR campaign from NPWS about nature, its importance, about that they do as an organisation, and why, and how... this has left an information vacuum, which has, inevitably been filled with doubts and untruths. We are in dire need in this country for a more balanced narrative in the media. Nature conservation issues are so side-lined and maligned among the general public, that when speaking out about them it is hard not to come across as, or be labelled as, an activist or a tree-hugger. We need a strong, persistent, sensible, balanced, calm campaign to normalise concern and actions for nature in Ireland, and we need a team to drive this, with the qualities just listed pertaining to them also! We also need some wellrespected (and famous) spokes-people. Who can be the Irish David Attenborough? President Higgins comes to mind. Someone who is respected, and whose opinion would be listened too, not side-lined or pigeon-holed immediately at being that of a tree-hugger or activist!</p>
36	<p>Target 3.1: Enhanced appreciation of the value of biodiversity and ecosystem services amongst policy makers, stakeholders, local communities and the general public</p> <p>This target reflects some of the good work that has been carried out to date, and commits to a continuation of those actions, however the plan will need to identify specific additional actions in order to make a significant increase in awareness levels. There is a dearth of positive communications on nature related issues in Ireland. 📄</p>
36	<p>Target 3.1: This target reflects some of the good work that has been carried out to date, and commits to a continuation of those actions, however the plan will need to identify specific additional actions in order to make a significant increase in awareness levels. There is a dearth of positive communications on nature related issues in Ireland.</p>

Page	Comment
36	<p>Target 3.1.2, relates to training. We would propose the PI is revised to incorporate specifics including an element of spatial coverage e.g., “Training courses, will be designed and run for local communities in x number of local authority areas/counties, for target groups including children, adults and retired people. Training materials will be made available online for interested community groups”.</p>
36	<p>The addition of “local communities” to Target 3.1, since the July draft, is a very positive development.</p> <p>3.1.1. Consult with local communities to develop actions and performance indicators to help achieve the objectives of this plan</p> <p>Environmental NGOs should be included in the list of actors / key partners.</p> <p>Communities should not only be consulted on actions and performance indicators but also engaged with and empowered to carry out agreed upon actions. Yes, “local communities are the ones who can most directly benefit from those ecosystem services” but they are also the ones who are best placed to protect and enhance the biodiversity which supplies the ecosystem services.</p> <p>The inclusion of a public communications representative on the LIFE Raised Bog team is a very positive action.</p>
Survey Monkey	The BSBI fully supports this objective.
Survey Monkey	The projects identified in our comments on Objective 7 will also assist in achieving the respective themes in Objectives 3
Survey Monkey	The word "number" is used as an indicator without working out what "number" means this objective has been met?
Survey Monkey	This awareness has been seen by the Irish People for a very long time and been working well for them.

Page	Comment
36	<p>Under Action 3.1.1. We recommend replacing 'consult' with an alternative word like 'involve', 'engage'. We feel these words give a stronger message to communities that they are involved with the wetlands and give them a sense of ownership and responsibility for them.</p>
37	<p>We propose that Action 3.1.3 be rewritten as follows:</p> <p>3.1.3. Raise awareness in private sector organisations of impacts and dependencies on biodiversity and ecosystem services</p> <p>2017-2021</p> <p>Actors: Private sector organisations, IFNC, BITCI, IBEC, ISME, IFA, IOOA</p> <p>Performance Indicators: 1. Biodiversity issues reported in non-financial reporting (CSR), 2.</p> <p>Guidelines and support tools are available to inform private sector</p> <p>Baseline: Business in the Community Ireland (BITCI) has developed a Framework for Business Engagement with Biodiversity and is already working with a number of large companies within its network through workshops and one-on-one advisory to incorporate biodiversity into their corporate responsibility activities. The high-level 'Wheel' graphic is public but the full Framework is currently available to network members only. The IFNC is working with the private sector to raise awareness of the potential for natural capital to support better decision-making and facilitate organisations to account for their natural capital impacts and dependencies through workshops and the promotion of international guidance including the Natural Capital Protocol.</p>

Page	Comment
Survey Monkey	We suggest more information and education on the value of biodiversity within food crops - eg: the scope for variety within a particular crop species (heirloom varieties, rare breeds, differences in flavour, colour, texture, growing characteristics; disease and pest resistances, suitability to soil and weather conditions, etc). There is great focus (and rightly so) on naturally occurring species and their value, but there is much less information on diversity of domesticated crops and how biodiversity within domesticated crops can significantly benefit human beings and our sustainable existence and resilience against threats to our agriculture. We suggest greater emphasis on variety choice for school and community gardens and promotion of more diverse varieties eg: Irish grown seed, and heirloom or rare breeds. Discussion and information / education on variety choice / sourcing and why it can benefit our biodiversity in the longterm. ISSA has an education programme which delivers such education to local schools in the Co. Clare area and beyond - this could be better linked into overall national education programmes.
Survey Monkey	We welcome the objective within the Action Plan of reaching out to farmers and utilizing their skills and knowledge to protect and improve biodiversity. However we believe that this measure will be ineffective and piecemeal while the government of the day continually prioritises increases in production over long term economic planning and environmental responsibility
Survey Monkey	Whilst there continues to be no Biodiversity Officer positions in Local Authorities in Ireland, there is little scope for increased awareness and appreciation. In contrast every local authority in Northern Ireland has a 'Biodiversity officer'. Local NPWS staff do not have the capacity to assist in this regard due to the commitments on their work. It is felt that this target cannot be implemented without significant changes in provision of biodiversity officers (or similar) at a local level.
36	With regard to consultation with local communities in action 3.1.1 Mountaineering Ireland recommends the inclusion of Public Participation Networks as partners. The PPN is a new mechanism for civic engagement which has been established in each local authority area.

Page	Comment
35	<p>With regard to Objective 3, SECAD and the B Team have been involved in developing workshops etc. aimed at increasing awareness and appreciation of biodiversity and ecosystem services to a variety of groups in the community. While use of the term Biodiversity in a document such as the National Biodiversity Action Plan is entirely appropriate in that context, we have found that there is a lack of understanding of the term in certain sections of the community whereas there is a broader appreciation of the term 'Nature'. The National Biodiversity Action Plan as published is of use to a number of groups within society, however we feel that a version couched in more 'popular science' language would aid its adoption by larger sections of society. As a model, the approach adapted by the National Biodiversity Centre in producing junior and sectoral versions of the All-Ireland Pollinator Plan is a very good one.</p>
40	With respect to 3.1.11, see point 5 b above.
39	With respect to action 3.1.10, Gardening Organisations and Industry Groups, and Gardening Media Personalities are missing as actors/key partners. The use of Gardening Media Personalities could be referenced in indicators.
38	With respect to action 3.1.8, it would be useful to broaden out the actors and key partners to all/multiple departments, and to encourage department ministerial involvement in promotion events within indicators

Page	Comment
Survey Monkey	<p>Yes, to me there is a fundamental gap in our educational system. Currently in the training of primary school teachers there is not a single component of their training done in the outdoors. as we are increasingly an urbanised society there is an ever increase in disconnection to natural environment. if teachers are not brought to the outdoors in their fundamental training what hope is there for the children. we must somehow create a "falling in love with natural environment" feeling .....we care for what we love.....Dewey the famous educator, valued experimental learning.....teachers in their training need to experience the wildness of nature and the adventure and the understating of the complexity of the web of life.....whilst you make reference to Bord na Mona, Burrenbeo, etc.....I have attended these courses , terrific as they are , they are an add on rather than a fundamental part of teacher training.....where are our priorities....we give lip service if it is not embedded in a real and exciting way in the curriculum and in training.</p>



Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Objective 4	
Page	Comment
	A target is missing that requires DAFM to produce an appropriate and adequate Department wide Sectoral Action Plan per the 2002 Action Plan Target 2.2 and that its sectoral action plan encompass the requirements of the information box on that page 13 and preferably more besides. There is a big gap and impediment to Progress on achieving the objectives made by the cumulative 3 National Action Plans because of the absence of DAFMs BAP.
	Target 4.1.1 CONTEXT Department of Agriculture, Food and the Marine"s (DAFM) Guide to Land Eligibility Direct Payment Scheme clarifies the situation on what habitats can be paid on through the Basic Payment Scheme (BPS) for those lands within the Natura 2000 network. However the resolution of eligibility issues has not been completely extended to those
52	There should I suggest also be an additional action under target 4.5 that refers to encouraging/ focusing on maintenance and creation of stepping stones and habitat connectivity where the matrix is less valued habitat eg intensified grazing. Indicators could include pilot projects at minor river catchment scale. Local communities should be involved and supported
42	With respect to action 4.1.1, there needs to be a requirement for 'evidence based' payment for partaking in AES. Payment only should come after evidence of biodiversity enhancement has been supplied. This should be referenced in the indicator as well as a percentage target for compliance audits. The bar for meeting the specification of AES must be at least moderate to high so that money is not wasted on protecting poorly diverse agri habitat or on poor biodiversity enhancement results. A qualified biodiversity or ecology officer should have the casting vote on the specifications of the schemes so that public money achieves the best results for biodiversity.
53	With respect to action 4.6.5, there is no performance indicator
Survey Monkey	"When the Heritage Bill 2016 is introduced..." Really? Are you unaware of the problems this wretchedly regressive piece of legislation is facing in the Oireachtas, opposed as it is by virtually all environmental experts. The apparent acceptance of the passage of this bill seems to imply a level of support for it by the authors of this Plan which would be very concerning.

Page	Comment
Survey Monkey	<p>1. Increase enforcement and improve reviews of transgressor of regulations (ie, felling license follow up).</p> <p>2. Improve education and awareness, regulations and maintenance of road side tree/hedgerow pruning and cutting (ie, ensure appropriate cutting times, flail blade maintenance and proper tree practices are in place). Poor practice is not only unsightly but weakens the genetic strain and invites decay and future damage</p>
42	1st Paragraph NEW TEXT: BirdWatch Ireland's <b>Group Species ,Action Plans</b> for birds ( <b>insert Reference</b> ), and the biodiversity action plan from the company BordnaMóna
41	1st Paragraph NEW TEXT: The Irish countryside is predominantly grassland, woodland, uplands, peatlands, and freshwater habitats <b>along with coastal estuaries and bays and deep sea habitats.</b>
41	2nd Paragraph NEW TEXT: According to Ireland's report to the EU on the condition of habitats and species of European interest, the main pressures and threats t biodiversity are: agricultural intensification, natural system modifications (drainage, burning, reclamation, <b>land use change</b> , coastal protection), invasive and problematic species, and human intrusion and disturbances.
41	2nd paragraph: Comment in response to . Significant efforts must be made to restore biodiversity and ecosystem services that have been lost due to inappropriate land use .
Survey Monkey	<p>4.1.1 While we welcome the implementation of agrienvironment schemes (AES) under the Rural Development Programme and adherence to the Good Agricultural and Ecological Condition (GAEC) schemes we believe that these do not adequately address the threat to biodiversity of increased production methods and industrial scale farming. The introduction of large scale farming practices (such as grain fed cattle) and intensive farming threatens both Ireland's image as a sustainable, green food producer and the protection and improvement of our biodiversity. The Green Party calls for sympathetic grassland management techniques to be a required aspect for all groups within the agriculture sector as part of this biodiversity plan and the phasing out of indoor reared livestock.</p>

Page	Comment
42	<p>4.1.1. Development and implementation of agri-environment schemes (AES) under the Rural Development Programme (i.e. Green, Low Carbon, Agri-environment Scheme (GLAS) and locally led AES (LLAES). Ensure AES achieve a quantifiable net gain for biodiversity and ecosystem services including significant habitat restoration measures</p> <p>AES are probably the most important tool available to tackle biodiversity loss. Various studies have been carried out on the effectiveness and value for money of EU AES with varying conclusions. It is clear that AES can be effective for conserving wildlife on farmland, but they are expensive and need to be carefully designed and targeted. Given the importance of these schemes and the vast sums of money invested in them it is important that the impact of these measures are verifiable and quantifiable. In the past the DAFM and Origin Green have quoted the number of farms participating in AES as an indicator of the ‘green’ credentials of Irish agriculture. However, without any indication of compliance, effectiveness or value for money, this is a meaningless way of judging the performance of Irish agriculture. . The fact that agricultural intensification is having a huge net negative impact on biodiversity means that serious improvements must be made if the target of achieving “a quantifiable net gain for biodiversity and ecosystem services including significant habitat restoration measures” is going to be achieved.</p> <p>If we are to turn things around then effective baseline indicators are needed. Ecological evaluations must become an integral part of any AES, including the collection of baseline data, the random placement of scheme and control sites in areas with similar initial conditions, and sufficient replication. Results of these studies should be collected and disseminated more widely, to identify the approaches and prescriptions that best deliver biodiversity enhancement and value for money from community support. It is also important that farmers are involved in the design of schemes as AES have to be easy to implement, feasible on a large scale, and palatable to farmers. Locally-led and result-based AES which give farmers the freedom to farm and implement measures in their own way will bear the greatest fruits.</p> <p>The economic costs of schemes must be integrated into their evaluation. Any expenditure of taxpayers’</p>

Page	Comment
46	<p>4.1.10. Implement the management of deer in Ireland's woodlands as per recommendations in the Woodlands of Ireland strategy</p> <p>The protection of Ireland native populations of Red Deer must be prioritised in any future deer management programme.</p>

Page	Comment
43	<p>4.1.2. Identify High Nature Value (HNV) farmland and develop measures to maintain and enhance its biodiversity and ecosystem services</p> <p>The ongoing loss of biodiversity associated with semi-natural ecosystems, both within and outside of the Natura 2000 network, is an issue, right across the EU. More than 50% of Europe's most highly valued biotopes occur on low-intensity farmland. The need to protect farming systems in Europe of greatest biodiversity value or 'High Nature Value (HNV) farming' has been embraced at an EU level and it is recognised that the conservation of HNV farming is essential if the EU is to meet its 2020 biodiversity targets. Given that Ireland has a high percentage of HNV farmland relative to other countries in Western Europe it is vital that we protect these threatened habitats and species. HNV farming is also associated with marginal communities with socio-economic issues and is often associated with traditional forms of land management which have important cultural significance. This heightens the need to support the sustainable management of HNV farming.</p> <p>The baseline column says "Forest Service has safeguards to avoid afforestation on environmentally unsuitable sites, taking account of habitats and species of EU interest, water quality and acid sensitive areas."</p> <p>In EU regulation No 807/2014 of 11 March 2014 [supplementing Regulation (EU) No 1305/2013] of the European Parliament and of the Council on support for rural development by the European Agricultural Fund for Rural Development (EAFRD) have provided some provisions relating to the protection of HNV farmland from afforestation: <a href="http://eur-lex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32014R0807&amp;from=en">http://eur-lex.europa.eu/legalcontent/EN/TXT/PDF/?uri=CELEX:32014R0807&amp;from=en</a></p> <p>Article 6 of the regulation reads (emphasis added):</p> <p>"Minimum environmental requirements with which the afforestation of agricultural land must comply should be laid down ensuring that no inappropriate afforestation of sensitive habitats including areas under high natural value farming takes place and that the need for resilience to climate change is taken into account. On sites designated as Natura 2000, afforestation should be consistent with the management objectives of the sites concerned. Special attention should be paid to specific environmental needs for particular sites such as the prevention of soil erosion. More stringent rules should be provided for afforestation</p>

Page	Comment
43	<p>4.1.3. Implement the National Peatland Strategy</p> <p>An Taisce's opinion on the National Peatlands Strategy was covered in our submission to the draft document: "Draft Peatland strategy treats science as something to be bargained away or traded against".</p> <p><a href="http://www.antaisce.org/articles/draft-peatland-strategy-treats-science-something-be-bargainedaway-or-traded-against">http://www.antaisce.org/articles/draft-peatland-strategy-treats-science-something-be-bargainedaway-or-traded-against</a></p> <p>The draft treats science - and the scientific consensus on the future prospects for humanity without action on climate change – as capable of being bargained away, traded against, or 'balanced' against other factors. Such a view is the stuff of fantasy.</p> <p>Bogs are a vital store of carbon and burning turf releases far more climate-altering gases than coal. Of all fuels, turf is the worst in terms of negatively affecting the climate.</p> <p>The 2011 BOGLAND report by the EPA noted that the 10 million tonnes of annual emissions from peatland degradation and burning is equivalent to Ireland's annual car emissions.</p> <p>The EPA set out ten leading recommendations advising government that "the continued carbon emissions from peat burning are contrary to the national interest".</p> <p>Recommendations included the restoration of protected peatlands to stop carbon loss, and the management of non-designated peatlands (also to stop carbon loss), a review of the peat industry, and the creation of a National Peatland Park. Its recommendations also cover peatland management as well as reviewing the horticultural peat sector.</p> <p>The EPA found Government policies "at odds with ... international and national government policies and conventions, specifically those addressing climate change, biodiversity protection and environmental sustainability".</p> <p>Published in Oct 2013, the summary of the Intergovernmental Panel on Climate Change's Fifth Assessment Report stresses how we must decarbonise energy, and protect, enhance and restore carbon stores.</p> <p>In other words, in trying to accommodate vested interests, the Draft Strategy is inconsistent with both international and domestic scientific advice on carbon management.</p> <p>The Draft Strategy continues the wholesale policy failures of the past by not addressing the carbon</p>

Page	Comment
44	<p>4.1.3. Implement the National Peatland Strategy – Action 5 of this strategy proposes “A review of the use of peat in the horticultural industry will be undertaken”. We suggest that an action be added to the NPSAP relating to raising awareness of peat free alternatives to horticultural peat moss and supporting research into viable alternatives to peat moss for those who work in the landscaping and horticulture industries.</p>
44	<p>4.1.4. Implement Bord na Móna’s Biodiversity Action Plan 2016-2021</p> <p>The restoration of Bord na Mona’s cut over bogs must be given high priority. The potential to restore these bogs throughout the Shannon basin must be seized upon. The potential for these wetlands to attenuate flooding and enhance biodiversity, fisheries, carbon sequestration, recreation and tourism is immense. The restoration of these sites would be the most ambitious conservation undertaking in the history of the Irish State. The potential exists to create a wetland National Park on Bord na Mona cutover bogs throughout the Shannon Basin and in particular the Mount Dillon complex. Sadly this opportunity will be lost if Bord na Mona move ahead with plans to blanket the area with wind farms.</p> <p>Fantastic conservation projects have been carried out by community groups on Bord na Mona owned bogs such as Ballydangan, Co. Roscommon and Abbeyleix, Co. Laois. The potential to replicate these examples by leasing and selling bogs and cut-over bogs to community groups and eNGOs should be explored.</p>

Page	Comment
44	<p>4.1.5. Implement actions in the Forestry Programme 2014-2020, ensuring maximised positive outcomes for biodiversity and ecosystem services and restoration of areas impacted by inappropriate forestry, including implementation of recommendations of HYDROFOR study and incorporating the inventory of native woodlands</p> <p>Forestry is an important land use from a biodiversity perspective in that it has an increasing land cover in areas of the country which are very important for biodiversity. Forestry is targeted to expand in areas of marginal farmland. These areas are more likely to support High Nature Value farmland and designated habitats and species under the Birds and Habitats Directives. Many of Ireland's last remaining high status waterbodies under the Water Framework Directive are also in upland areas with high carbon soils. Forestry must be prioritised as an area which needs a lot of attention over the life of the NBAP. Its status as a high-ranking threat/pressure on biodiversity is reflected in the most recent (2013) Article 17 report. An Taisce's views on the various issues related to Ireland's current forestry model are covered in these two reports:</p> <p>The environmental integrity of Irish forestry in the context of the EU's effort sharing decision (2016)</p> <p><a href="http://www.antisce.org/publications/the-environmental-integrity-of-irish-forestry-in-thecontext-of-the-eu%E2%80%99s-effort-sharing">http://www.antisce.org/publications/the-environmental-integrity-of-irish-forestry-in-thecontext-of-the-eu%E2%80%99s-effort-sharing</a></p> <p>An Taisce submission Re: Draft Environmental Requirements for Afforestation (2016)</p> <p><a href="http://www.antisce.org/articles/an-taisce-submission-re-draft-environmental-requirements-forafforestation-2016">http://www.antisce.org/articles/an-taisce-submission-re-draft-environmental-requirements-forafforestation-2016</a></p> <p>This action corresponds with July draft action "4.5.5 Implement actions in the Forestry Programme 2014-2020, ensuring maximised positive outcomes for biodiversity and ecosystem services and restoration of areas impacted by inappropriate forestry."</p> <p>This action has been considerably strengthened by the inclusion of the HYDROFOR study recommendations. The HYDROFOR study was a 7-year assessment of the Impacts of forestry operations on the ecological quality of water in Ireland. This comprehensive study reaffirmed the eutrophication, acidification and sedimentation impacts of commercial forestry during the closed canopy, harvesting and planting phases on rivers and lakes in Ireland. The study again highlighted the established negative impacts of forestry operations on surface water quality and freshwater</p>
45	<p>4.1.6 This action is considered a rather vague action. We would suggest to replace this action with Implement the Strategy for Native Woodlands in Ireland 2016-2020 and use the implementation of the actions and the targets in this strategy as performance indicators.</p>



Page	Comment
44	<p>4.1.6. Continue to update the inventory of native woodlands, review and, where appropriate, incorporate the results of the Native Woodland Survey into the conservation and expansion of the native woodland cover</p> <p>Ireland is one of the least forested countries in Europe with about 10.5% of its area under forest cover; however the majority of this is composed of non-native conifer species. These monoculture blocks of conifers account for 72.8% of the national forest estate, of this 52.4% is made up of just one species, Sitka spruce (<i>Picea sitchensis</i>). While trees like Sitka spruce support biodiversity in their native distribution along the North-western seaboard of North America they support relatively low levels of biodiversity in Ireland. Only around 2% of the country is covered by what is termed native or semi-natural woodland, and much of this is highly fragmented and modified (Gallagher, et al., 2001).</p> <p>The native woodland scheme must be expanded. Schemes which encourage agroforestry and continuous cover forestry should be developed implemented. Sitka spruce continues to make up far too much of Ireland's forest cover. This is not good from a biodiversity or water quality perspective. It is also not good from an economic perspective as diseases or pests could floor the forestry sector in a short period of time if Sitka Spruce was affected.</p> <p>Ireland has a number of eNGOs which focus specifically on Native Woodland Conservation, such as LEAF, for example, as mentioned above. These groups should be included in the list of Key Actors/Partners</p>

Page	Comment
45	<p>4.1.7 It is recommended that the relevant action plans be listed here e.g. lowland farmland birds, riparian birds, woodland and scrub birds, upland birds and Lake, Fen and Turlough birds.</p> <p>Performance indicators can then be linked the number of actions implemented and to population trends in the targeted species in these documents to establish if they have had a real impact.</p>

Page	Comment
45	<p>4.1.7. Progress implementation of BirdWatch Ireland's action plans for wider countryside birds</p> <p>The drafting of BirdWatch Ireland's action plans for wider countryside birds was an outcome of the EU legal action Judgment of the Court of Justice of the European Union in Case C 418/04 Commission v Ireland “The Birds Case.” One of the main issues identified was the lack of a coherent strategy for the protection of ‘priority, migratory and dispersed’ bird species in the wider countryside (i.e. outside of protected areas) in Ireland.</p> <p>As far as An Taisce is aware, no further action has been taken to implement conservation measures related to the actions plans since they have been drafted. This is reflected in the baseline comment “BirdWatch Ireland has published comprehensive plans for the conservation of Irish birds.”</p> <p>According to BirdWatch Ireland delivering tangible conservation actions for all 10 bird species groups</p> <p>birds in Ireland have been identified through the setting of a number of targets (total 150) and actions (total 455) which are grouped into four themes:</p> <ul style="list-style-type: none"> <li>• Theme 1: Research &amp; Monitoring (52 targets, 145 actions)</li> <li>• Theme 2: Policy, Legislation and Advocacy (37 targets, 122 actions)</li> <li>• Theme 3: Species and Site Protection (41 targets, 131 actions)</li> <li>• Theme 4: Education and Awareness (20 targets, 57 actions)</li> </ul> <p>A specific target must be set to achieve some or all of these actions over the course of this NBAP.</p> <p>The previous draft of the NBAP stated “Implement as resources permit, BirdWatch Ireland’s action plans for wider countryside birds.” The inclusion of “as resources permit” does not give the impression that this will be a high priority under the NBAP. Given the staggering collapse in many groups of birds and in particular farmland bird populations it is hard to understand how the implementation of these plans would not be given high priority.</p> <p>The former draft of the NBAP contained the action “4.5.6 Nationally and internationally threatened (i.e. Red-listed species and species listed as Birds of Conservation Concern) integrated into planning and environmental assessments and relevant sectoral policies.” It appears that this key action has been removed from the plan. An Taisce strongly feels that this action should be reinstated. It would support implementation of action 4.1.7 and potentially stop more bird species following the corn</p>

Page	Comment
45	<p>4.1.9. Implement the All-Ireland Pollinator Plan including: making the Irish countryside more pollinator friendly; raising awareness of pollinators; supporting beekeepers and growers; expanding knowledge of pollinators; and collecting evidence to track changes.</p> <p>Please refer to relevant comments made under 2.1.14 and 1.2.3. The actions related to Section 40 of Wildlife Act within the Heritage Bill are not in line with the All-Ireland Pollinator Plan.</p> <p>Teagasc's best practice hedgerow management guidelines should be promoted through communication with farmers and local authorities and through Origin Green and agri-environmental schemes.</p> <p>Bee and pollinator decline is strongly linked to the loss of semi-natural grassland and High Nature Value farming. Actions relating to these issues should be tied in with this action.</p> <p>Given the strong link between pollinator decline and pesticide use it is pivotal that Ireland increases the number of farmers choosing to go organic. We have currently one of the lowest levels of organic farming in the EU. There is a growing demand for organic produce and there is an economic and environmental opportunity to promote growth in this area. The DAFM and World Wide Opportunities on Organic Farms (WWOOF) should be considered a Key Partner in this action.</p> <p>Performance indicator – The number of farmers going organic / the area of land under organic production.</p>
46	<p>4.2.1. Continue to protect, enhance and monitor water quality during the second cycle of the Water Framework Directive (2015-2021) by reducing risks to water quality and utilising ecological expertise in decision-making, and in analysis of cumulative effects</p> <p>Key threats to water quality and in particular diffuse agricultural pollution must be addressed in coordination with the EPA, DAFM and other key stakeholders.</p>
46	<p>4.2.2. Irish Water to implement its Water Services Strategic Plan (2015-2040) in particular its objective to protect and enhance the environment</p> <p>An Taisce would strongly support this point.</p>

Page	Comment
47	<p>4.2.3. Implement recommendations of EPA STRIVE Report Series No. 99 (Management Strategies for the Protection of High Status Waterbodies) including, amongst other measures: prioritisation for protection measures; planning/licensing control; assessment of cumulative impacts; and integrated monitoring and protection</p> <p>The conservation of High Status Sites is an area which, An Taisce feels, needs to be prioritised by the NPWS and the EPA over the life of this NBAP and over the course of the current WFD cycle. We have raised the need to implement the recommendations of the of EPA STRIVE Report Series No. 99 through our input into the Biodiversity Form.</p> <p>This action will tie in with the actions to restore areas impacted by inappropriate forestry, including implementation of recommendations of HYDROFOR study as outlined in action 4.1.5.</p> <p>The conservation of the FWPM and the Atlantic Salmon will be key actions for the NPWS over this NBAP. Both species are dependent on High Status Sites and will benefit from this action.</p> <p>High Status Rivers show a negative correlation with agricultural intensity. The protection of these waterbodies should be connected to the conservation of High Nature Value farming and relevant Locally Led Schemes such as Upland Scheme, Hen Harrier Scheme, and Freshwater Pearl Mussel Scheme.</p>

Page	Comment
47	<p>4.3.1. Ensure that Flood Risk Management (FRM) planning and associated SEA, EIA and AA, minimises loss of biodiversity and ecosystem services through policies to promote use of “soft” options, landscape and habitat restoration and sustainable land management</p> <p>The use of dredging as a solution to flooding should not be supported by the OPW, based on the failure of the dredging to meaningfully address flooding, coupled with its massive negative environmental impact. Solutions which reduce run-off and create space for flood water where it will have the least economic or social impact should be prioritised. It is clear that the EU Nature Directives (Birds and Habitats) do not prevent measures being taken to protect lives and property. In particular they provide for situations of 'over-riding public interest' to permit activities that might damage a Natura 2000 site but which are necessary for human welfare. The Directives do however require an assessment of the options available before a conclusion is reached that such damage is unavoidable. There is a clear obligation on the OPW to exhaust alternative options before causing significant negative impacts on Natura 2000 sites. Indeed at a time when we have lost so much of our wetland and peatland habitats there are opportunities for coupling ecosystem rehabilitation and restoration with flood relief. It is clear that such an approach would be aligned with the Water Framework Directive and the Habitats and Birds Directives.</p> <p>Dredging may have limited positive impacts, particularly where stretches of rivers are located close to the sea. In some cases it may be an attractive option because it may help to sort out a local problem but in turn it may also just transport the problem downstream, sometimes from rural to urban areas where the damage on properties and economic activities can be much higher. Therefore the basin-wide approach included in EU policies is essential to find effective and long-term solutions.</p> <p>Where biodiversity is impacted by FRM plans then meaningful mitigation measures should be adopted which replace and enhance habitat in other areas. There is an opportunity for wetland restoration throughout the country on Bord na Mona cut-over bogs for example.</p>

Page	Comment
47	<p>4.3.2. All significant drainage (arterial drainage), including both initial drainage and maintenance drainage will be assessed for its implications for biodiversity, particularly for wetlands</p> <p>The impact of arterial drainage schemes on wetlands should also be considered from a flood risk perspective. It is clear that arterial drainage schemes have in places undermined the flood attenuation capacity of many of Ireland's wetlands and have both within and outside of wetlands reduced the retention time of flood water across catchments resulting in an increase in the intensity</p>
48	<p>4.4.1 One of the Performance Indicators is the number of successfully controlled invasions. In the action description however, reference is only made to the preparation of plans and protocols, monitoring and surveillance. No reference is made to actually dealing with the invasive species or implementing the invasive species plans. It may be more appropriate the move this particular PI to 4.4.2.</p>
49	<p>4.4.1 (Harmful invasive alien species are controlled and there is reduced risk of spread of new species). That section would seem to be a suitable location to include the International Ballast Water Management (BWM) Convention. The BWM Convention reached its ratification criteria on the 7th September 2016 and will enter into-force on the 8th September 2018. It is Ireland's intention to ratify the Convention (Have it entered into Irish law) prior to the international entry into force date, if possible. The Department of Transport, Tourism and Sport; Irish Maritime Administration is responsible for the transposition into Irish law and the effective enforcement of the BWM Convention in Irish waters. The BWM Convention requires the exchange or treatment of all ballast water carried on internationally trading ships. The aim of the BWM Convention is to eliminate the spread of harmful / invasive marine species, bacteria and pathogens that are transported in the Ballast tanks of all internationally trading ships.</p>

Page	Comment
48	<p>4.4.1 Develop national and whole island plans to implement the EU Invasive Alien Species (IAS) Regulation and relevant sections of Ireland's EU (Birds and Natural Habitats) Regulations 2011 including: development and adoption of biosecurity plans in relevant state bodies; a Rapid Response Protocol for the island of Ireland; and coordination and collation of invasive species surveillance and monitoring data; and work with Northern Ireland and UK authorities on invasive species of mutual concern</p> <p>An Taisce strongly support this All-Island approach.</p> <p>The Actors / Key Partners should include local community groups and eNGOS. Local communities should be empowered to remove invasive species. This would involve training, supervision and supplying them with the necessary tools.</p> <p>Key stakeholders such as angling groups should be supported in tackling key species such as Himalayan Balsam. Gamekeepers should be encouraged to target American Mink.</p> <p>The Nature's Way publication on Invasive Species launched by An Taisce should be reprinted to raise awareness about the impact of invasive species among children.</p>
49	<p>4.4.2 It is recommended that the Performance Indicator be amended to the number of successfully controlled invasions. The number of projects and studies undertaken is largely irrelevant in terms of controlling invasive species as set out in Target 4.4</p>
48	<p>4.4.2. Continue and enhance measures for eradication, where feasible, control and containment of invasive species</p> <p>Support local authorities in developing guidelines.</p> <p>Remove legislative barriers to controlling invasive species.</p>
49	<p>4.4.3 has no direct link with invasive species and should therefore be moved to section 4.1 of the plan for example.</p>
49	<p>4.4.3 OLD TEXT Roads Division of DTTAS uses native planting in landscaping national road schemes.</p> <p>NEW TEXT <b>Native planting is used in landscaping national road schemes. Obs from Irish Maritime Administration / DTTAS: Regarding Target.</b></p>



Page	Comment
49	<p>4.4.3. Support horticultural nurseries to: produce native species, varieties and landraces from appropriate native sources for public, and private sector plantings and public bodies will endeavour to plant native species</p> <p>As was said under action 3.1.10 Greater efforts should be made to ban the sale of invasive species in Ireland. In particular aquatic invasive species currently being sold in garden centres should be targeted as a matter of urgency. Rhododendron and laurel should be banned as a landscaping plant on public lands. Native flora should be given preference when carrying out landscaping on public lands. Legislation should be brought forward to stop the sale of plants identified as being invasive.</p>
49	<p>4.4.4. Continue to produce Risk Assessments for potentially invasive non-native species</p> <p>An Taisce strongly supports this action</p>
49	<p>4.4.5. Establish a multi-agency working group to bring together all relevant parties to meet on an all-island basis to work to achieve this target</p> <p>An Taisce strongly supports this action</p>

Page	Comment
50	<p>4.5.1. Review the effects of the revision of hedge cutting and burning dates in the Heritage Bill 2016 prior to the end of its two-year pilot phase</p> <p>It is disrespectful to the Oireachtas and our democracy that this point has been included in the public consultation. The Heritage Bill has not been passed and has still to be debated by both houses of the Oireachtas.</p> <p>A two year pilot is not a sufficient length of time to carry out a scientific study of this nature. To our knowledge no baseline analysis has been carried out. As this is a nationwide pilot, how will controls be established?</p> <p>Given the large population declines observed in species like yellowhammer even a two year pilot study, allowing a hedge-cutting extension could do irreparable damage. Yellowhammers are now in serious decline with a 61% drop in breeding range since the 1970s. Their numbers are also down significantly and because of these factors Yellowhammer is on the Red List of Birds of Conservation Concern in Ireland. Yellowhammers nest almost exclusively in hedgerows throughout August and into September. This action does not support the overarching objectives of this target or the National Biodiversity Action Plan 2017-2021.</p> <p>Thirty one of the reasons An Taisce, Birdwatch Ireland, Irish Wildlife Trust and the Hedge Laying Association think the Heritage Bill will negatively impact on the environment, landscape and biodiversity are within this document;  <a href="http://www.antaisce.org/sites/antaisce.org/files/31_days_31_reasons_complete.pdf">http://www.antaisce.org/sites/antaisce.org/files/31_days_31_reasons_complete.pdf</a></p> <p>An Taisce understands that the Heritage Bill 2016 proposes to repeal a paragraph of the Wildlife Act which provides protection from assault or obstruction, to an authorised person or a member of the Garda Síochána exercising any power or function conferred on the authorised person or member by or under the Wildlife Acts, 1976 and 2000.</p> <p>The section provides protection and a deterrent against assault to NPWS rangers who are often working on their own in isolated areas of the country and confronting criminals. Whereas, assaulting anyone is generally a criminal offence, with the repeal of this paragraph, Rangers will lose the protection from obstruction. Interestingly, within the same Bill, authorised officers of the Waterways are given that protection from obstruction</p>

Page	Comment
50	<p>4.5.2. Develop, adopt and implement restoration programmes for Salmon, Sea trout and Eels. Improve passage of migratory fish species and address barriers to fish movement. Put in place traceability scheme for Eel</p> <p>This action corresponds with action 4.10.4 in the previous draft “Develop, adopt and implement restoration programmes for salmon, sea trout and eels and use European Maritime and Fisheries Fund to improve passage of migratory fish species and address barriers to fish movement.”</p> <p>The European Maritime and Fisheries Fund is the relevant EU funding mechanism to improve passage of migratory fish species and address barriers to fish movement. It has been used for this purpose in other member states. This line should be reinstated into action 4.5.2.</p> <p>As was said under point 1.1.6 not enough funding is being drawn from the EMFF to restore marine ecosystems. Over fishing and the decimation of marine ecosystems is the main driver of the collapse in Ireland’s fishing sector. This reality is now recognised at an EU level and efforts are being made to restore fish stocks via the CFP. Despite this however virtually no actions were contained in Ireland’s Seafood Development Programme to restore marine biodiversity. Overfishing in fact was barely mentioned in the whole document. More funding needs to be leveraged from the EMFF to support the development of Marine Protected Areas, for example.</p> <p>There is a lot of cross-over with actions relating to High Status Sites under the WFD, pollution and flooding. Actions relating to the conservation of Freshwater Pearl Mussel will also be relevant. In particular action 4.2.3 is very relevant. The EPA catchments should be considered a key partner. Local authorities, conservation officers, Rivers Trusts and angling groups are all key stakeholders. It is clear that the ESB’s role in fisheries management on the Shannon and Erne systems in particular needs review.</p> <p>A review of the effectiveness of elver traps and fish passes throughout the country should be a considered a performance indicator under this heading. Ecofact have done some excellent work in identifying barriers to fish migration and should be consulted.</p> <p>When addressing fish migration Annex I lamprey species should also be catered for.</p> <p>The EPA funded Reconnect project is a perfect example of how technology and citizen science can help to support research and conservation efforts. The project uses a mobile phone app to map the extent and impact of flow barriers or obstacles in rivers on freshwater biology hydromorphology</p>

Page	Comment
51	<p>4.5.3. Implement species action plans including for: Red Squirrel, Red Grouse, Grey Partridge and reintroduced raptors and initiate further management actions as necessary</p> <p>As is the case with the threat response plans, species action plans will be a critical tool to address imperative species level conservation issues over the course of the next four years.</p> <p>Given the positive trend in Red Squirrel distribution, the resources directed towards this species action plan should be re-evaluated.</p> <p>The compatibility of the Hen Harrier Threat Response Plan with the Red Grouse Species Action Plan should be considered.</p> <p>The Golden Eagle population in Donegal is not currently sustainable. A targeted upland LLAES is needed to improve habitat quality in the Donegal Uplands. This scheme should focus of improving prey populations and should be targeted to benefit as many upland species as possible. With regard to deer and livestock densities, cross-border cooperation should be sought on this action.</p> <p>Illegal turf-cutting within the Derryveagh and Glendowan Mountains SPA, (Site Code: 004039) must be addressed.</p> <p>Species action plans for species such as Curlew, Lapwing and Redshank need to be developed.</p>

Page	Comment
51	<p>4.5.3. Implement species action plans including for: Red Squirrel, Red Grouse, Grey Partridge and reintroduced raptors and initiate further management actions as necessary.</p> <p>Performance indicator:</p> <ol style="list-style-type: none"> <li>1) Population levels of target species; and,</li> <li>2) Further management actions initiated in response to population trends.</li> </ol>
51	<p>4.5.4. Identify and implement measures to substantially reduce Ireland's ecological footprint on biodiversity</p> <p>The ecological footprint of imported biomass should be assessed. Domestic and imported sources of biomass which have a net negative impact on biodiversity should be phased out.</p> <p>Steps should be taken to ban from Ireland, the sale of products which contain un-sustainable palm oil. Only certified environmentally friendly palm oil should be used in Irish products.</p>

Page	Comment
52	<p>4.6.1. Enhance understanding and role of An Garda Síochána and Customs and the judiciary in enforcing Wildlife legislation, including provision of specific training and guidance</p> <p>Efforts should be made to educate the judiciary about the need for sentences which require habitat restoration. If someone is found to have damaged a protected site or species, they should have to pay the cost of rectifying their transgression.</p> <p>There is no performance indicator or Actor/Key Partner identified which indicates how the judiciary will be engaged. ☐</p>

Page	Comment
52	<p>4.6.2. Ensure adequate training in Wildlife Crime detection and enforcement is provided to all DAH enforcement staff</p> <p>In the UK the police have established a National Wildlife Crime Unit website and have supplied contact details for police stations which have staff trained in wildlife crime.</p> <p><a href="http://www.nwcu.police.uk/wildlife-crime-links/">http://www.nwcu.police.uk/wildlife-crime-links/</a></p> <p>The Gardai and DAH should commit to establishing an Irish Wildlife Crime Unit website. There should</p> <p>be personnel within the Gardai who have expertise in Wildlife Crime and can assist Gardai in implementing the relevant legislation.</p> <p>The section of the Heritage Bill 2016 should be removed which proposes to repeal a paragraph of the Wildlife Act which provides protection from assault or obstruction, to an authorised person or a member of the Garda Síochána exercising any power or function conferred on the authorised person</p> <p>or member by or under the Wildlife Acts, 1976 and 2000.</p> <p>The section provides protection and a deterrent against assault to NPWS rangers who are often working on their own in isolated areas of the country and confronting criminals. Whereas, assaulting anyone is generally a criminal offence, with the repeal of this paragraph, Rangers will lose the protection from obstruction. Interestingly, within the same Bill, authorised officers of the Waterways</p> <p>are given that protection from obstruction.</p>

Page	Comment
53	<p>4.6.4. Continue to enforce the Wildlife Acts and Regulations</p> <p>The EPA have obligations in relation to environmental damage under regulation 15 of the European Communities (Environmental Liability) Regulations 2008 to 2011 (SI No 547 of 2008, as amended by SI No 307 of 2011; the ELD Regulations). The EPA should supply baseline data on their enforcement of these regulations. The EPA should be added to the list of Actors/Key Partners under this action.</p>
53	<p>4.6.5. Train and upskill enforcement officers in other agencies that are in the field on wildlife law</p> <p>Upskilling should also be targeted at local authority inspectors so that they can identify incidences of wildlife crime.</p> <p>As in 4.6.4 the EPA should be included as an Actor/Key Partner.</p>
41	<p>4th Paragraph NEW TEXT: Over 31,000 species of plants, animals and fungi are known to inhabit Ireland's terrestrial and marine environments – this wording allows for the many more species yet to be discovered.this wording allows for the many more species yet to be discovered.</p>
41	<p>4th Paragraph: This can include habitats ... that fall outside designation under the Habitats ... Directive – and yet limestone pavement, a priority habitat under the Habitats Directive, is still being actively destroyed for agricultural reclamation outwith SACs in the Burren. This is inconsistent with the 'spirit' of the Habitats Directive. What is the legal status of a priority habitat outwith the SAC series?</p>
Survey Monkey	<p>A biodiversity grant scheme to encourage roost owners , community groups etc to run schemes should be launched. Agenda 21 grants are not entirely suitable and cannot do large projects, LIFE funding is only accessible to .very big organisations. A mid size grant is required</p>



Page	Comment
Survey Monkey	Acknowledge that DAFM are reviewing the effectiveness of GLAS in terms of biodiversity gain (ADAS-Scott Cawley project). Again need an indication as to how to gauge if the Objective has been successful. . Not sure about "4.5.4. Identify and implement measures to substantially reduce Ireland's ecological footprint on biodiversity" seems very ambitious title and does not relate to the baseline? Target 4.6: Improved enforcement of Wildlife Law- commitment to having County or area based Wildlife Crime Officers within Garda.
43	Action 4.1 – same point as under para 4 above.
43	Action 4.1.1 Comment on Performance Indicator 4. . Compliance rates of farms
42	Action 4.1.1 Development and implementation of agrienvironment schemes (AES) There are multiple examples of NPWS being contacted for damaging farming practices with no action being taken and lack of sufficient legislation being cited - perhaps this is lack of ranger training? Cross compliance is not being implemented so suggest a further Action point on training and recording of cross compliance such that data is available for Habitat's Directive Article 17 reporting. Suggest also that DAHRRGA are added to the key players.
43	Action 4.1.1: Baseline NEW TEXT GLAS measures planned for 50,000 farms including priority access for farmers within Natura 2000 sites <b>and other priority HNV areas</b>
43	Action 4.1.1: NEW TEXT: Ensure AES achieve a quantifiable net gain for biodiversity and ecosystem services including significant habitat <b>maintenance and</b> restoration measures
43	Action 4.1.1: Performance Indicator NEW TEXT: 3. Area of habitat <b>maintained</b> /restored
42	Action 4.1.1. Need new indicator for LLAES/EIP. Proposed wording: "Number and area covered by EIP/LLAES programmes focused on addressing priority 4a of Rural Development Programme". ☐

Page	Comment
43	Indicators 1 reword “Monitoring programme for extent, distribution and quality of HNV farmland agreed and implemented”. Indicator 2 does not make sense, not possible to divide HNV farmland into a discrete number of areas and not sure what purpose this would serve. Indicator 4 reword “Expenditure on biodiversity related AES measures in HNV areas”.
43	Action 4.1.2 Baseline: On-going research on results-based agri-environment schemes (RBAPS ) on HNV farmland on Shannon callows and in Co. Leitrim
43	Action 4.1.2 Comment Action: Identify High Nature Value (HNV) farmland and develop measures to maintain and enhance its biodiversity and ecosystem services
43	Action 4.1.2 Comment on Baseline: Forest Service has safeguards to avoid afforestation on environmentally unsuitable sites, taking account of habitats and species of EU interest, water quality and acid sensitive areas
43	Action 4.1.2 NEW TEXT: 2. Number of areas identified as HNV <b>Acreage of HNV avoided for afforestation</b>
43	Action 4.1.2: Baseline- NEW TEXT <b>Output of DAFM funded IDEAL HNV research project to be considered when finalised.</b>
43	Action 4.1.2: HNV Farming and the approach adopted has done much to secure support from rural communities and the farming sector for action on biodiversity. Models have shown the contribution to be made by dedicated locally based area teams and in that regard the development of Irish Uplands Partnerships as proposed by the Heritage Council is worthy of note. Its application outside of designated areas is fundamental in that regard as we build towards the next tranche of EU funding from Rural Development. Recent research from the Irish Uplands Forum of both a quantitative and qualitative nature supports the case.

Page	Comment
43	Action 4.1.3 The performance indicator "Number of bog sites with restorative activities completed" is a much better indicator and should be replicated in actions throughout the plan.
44	Action 4.1.5 Comment on Baseline: New Environmental Afforestation Requirements in place that are fully compliant with EU Directives
45	Action 4.1.7 Baseline NEW TEXT: BirdWatch Ireland have published comprehensive plans for the conservation of Irish birds <b>but implementation of these has not been funded. Stakeholder commitment to the plans needs to be strengthened.</b>
45	Action 4.1.7 NEW TEXT: Progress implementation of BirdWatch Ireland's <b>Group Species Action Plans for Birds</b>
45	Action 4.1.7 Performance Indicators: add Number of actions undertaken and delivered
45	Action 4.1.8 –genetic resources - mention the sterling work being undertaken by the <b>Irish Seed Savers Association,</b>
45	Action 4.1.9 Again the performance indicator "Number of Actions implemented" is a much better indicator and should be replicated in actions throughout the plan.
46	Action 4.1.9 Observation: this action has proven to be hugely successful, has garnered extensive support amongst partner organisations, and presents a structure for delivery of many wider biodiversity actions. However, the effective implementation of the Plan, even for the co-ordination oversight provided by the Data Centre, more resources are needed. The failure to allocated modest dedicated additional resources for implementation of the Plan presents a real challenge for the whole initiative.
46	Action 4.1.9: This action should also be supported through other related actions too and cross referenced to the fund proposed under 3.1
46	Action 4.2.1 Continue to protect, enhance and monitor water quality..... Baseline section mentions that the first cycle River Basin Management Plans (RBMP) 2009-2014 has been prepared. Should this be 2009-2015?
46	Action 4.2.1. Continue to protect, enhance and monitor water quality ..... Water quality is often compromised owing to water quantity through drainage or abstraction. The role of hydrological function and water quality needs to be included here or in a separate action point.

Page	Comment
47	Action 4.2.3. Implement recommendations of EPA STRIVE Report Series No. 99 (Management Strategies for the Protection of High Status Waterbodies) including, amongst other measures: prioritisation for protection measures; planning/licensing control; assessment of cumulative impacts; and integrated monitoring and protection.
47	Action 4.3.1 Ensure that Flood Risk Management It is important to add DAHRRGA to the key partners here
47	Action 4.3.1 Ensure that Flood Risk Management (FRM) planning and associated SEA, EIA and AA, minimises loss of management .... A review and assessment of whether this target has been achieved in any of the CFRAMS in Ireland as part of this target is suggested. A comment from a consultant's personal experience as an ecologist in large consultancy: " It hasn't happened. The Flood Relief Schemes are been
47	Action 4.3.1 NEW TEXT Performance Indicators: 1. Inclusion <b>of assessment of soft engineering options in FRM plans.</b> <b>2. Assessment of wider land use change on drainage and on water flow within FRMs.</b> <b>1.3. Development of meta assessment of cumulative impacts of all FRMs on bird and otter populations</b>
47	Action 4.3.1. Ensure that Flood Risk Management (FRM) planning and associated SEA, EIA and AA, minimises loss of biodiversity and ecosystem services through policies to promote use of "soft" options, landscape and habitat restoration and sustainable land management.

Page	Comment
47	<p>Action 4.3.1.Relating to Flood Risk Management is very welcome. Many rivers and embankments are currently being damaged by bullzoing and clearance operations by OPW and others, thus the timeframe on this action should be 2017 – 2021 (not simply 2021) in recognition that this is an ongoing problem where urgent action is required to halt the destructive practices to aquatic biodiversity.</p> <p>In addition, an action should be included in the NBP to support Natural flood management (NFM). Natural flood management is an approach to managing flooding which works with natural hydrological processes throughout the catchment to store flood water temporarily during flood events. Natural flood management involves managing the pathways of water and enhancing the capacity of features throughout a catchment to store floodwater. Natural flood management measures include peatland restoration for flood attenuation; woodland creation to impede the flow of water and increase infiltration; managing wetlands to store flood water; reinstatement or creation of water storage features in floodplains; re-connecting rivers with their floodplain; creation of new features to temporarily store water; and Managed coastal realignment.</p> <p>Natural flood management has gained recognition as a viable and cost effective approach to flood risk management. It is particularly popular because there are additional benefits to biodiversity, climate change mitigation, and water quality, and as such it is seen as a holistic environmental management approach that increases the resilience of landscapes and society to the multiple challenges climate change. However it is an approach that is virtually unknown in Ireland and has not been trialled, piloted or widely discussed in any relevant spheres here, despite the growing problem of widespread flood damage in recent years. An action should be added to the NBP in this section to develop 3 pilot projects across Ireland implementing Natural flood management, involving local communities, academics, the OPW, the Department of Housing, Planning, Community and Local Government, the EPA and the NPWS.</p>
47-48	<p>Action 4.3.2 All significant drainage (arterial drainage), including both initial ....</p> <p>A timeline is missing here.</p> <p>DAHRRGA should be added to the key players here</p>

Page	Comment
48	Action 4.3.2 NEW TEXT: All significant drainage (arterial drainage), including both initial drainage and maintenance drainage will be assessed for its implications for biodiversity, particularly for wetlands <b>and will be compliant with the Birds Directive and the Habitats Directives.</b>
47	Action 4.3.2. All significant drainage (arterial drainage), including both initial drainage and maintenance drainage will be assessed for its implications for biodiversity, particularly for wetlands.
48	Action 4.4.1- Comment missing
49	Action 4.4.2 Observation: The Data Centre would need clarification on exactly what is envisaged under this action, as we would consider on the ground actions, or other land management interventions, as being outside the remit of the Data Centre. ☒
48	Action 4.4.2 – eradication and control of invasive species Suggest an Action in relation to secure disposal of invasive species material. It would be beneficial if some landfill operators could be assisted with the development of management strategies for the receipt and treatment of invasive species. As a starting point, one landfill could be identified in each province.
48	Action 4.4.2 There is mention of setting up a working group but it would be very useful to fund the Invasive Species Ireland Project which was all Ireland initiative and produced a co-ordinated approach on invasive species on an All-Island basis. The funding of ISI would contribute to all the actions within Target 4.4 and other targets within the plan
49	Action 4.4.2:Please note – many of these initiatives are emerging from the HC funded Co Heritage Plan actions with the Local authorities – identified by the local authority heritage Forums on which NPWS personnel play a role. The role of local groups must be recognised and supported too e.g. the Kerry Japanese Knotweed survey and Awareness project ( 2015) and Ballyhoura Development : River Maigue Catchment invasives control project ( 2016)
48	Action 4.4.2. Continue and enhance measures for eradication, where feasible, control and containment of invasive species. The example is given under ‘baseline’ of Rhododendron; it should be noted that, in the context of the Burren, certain Cotoneaster species have the potential to be every bit as invasive as Rhododendron has proved to be in the Irish landscape.

Page	Comment
49	100% native species or will 5% or less count?
48	Action 4.4.4. Continue to produce Risk Assessments for potentially invasive non-native species – this should be undertaken for the Cotoneasterspecies.
49	See comment above at Action 1.2.7. The risk assessments are a way of highlighting the risk but it is how they are managed and treated
50	Action 4.4.5 Observation: the Data Centre can contribute to this action assuming a ‘business as usual’ scenario for delivery of the Data Centre’s work programme 2018-22.
50	with to establish a coordinating framework for tackling invasive species. Such a framework would set out which species will be prioritised for action and what roles will be allocated to different
50	Action 4.5.1 Baseline: add NO BASELINE DATA HAS BEEN COLLECTED PRIOR TO THE ENACTMENT OF THIS LEGAL CHANGE IN ORDER TO BE ABLE TO SCIENTIFICALLY ASSESS CHANGES TO BIRD
50	Action 4.5.1 Comment Action : .Review the effects of the revision of hedge cutting and burning dates in the Heritage Bill 2016 prior to the end of its two-year pilot phase
50	Action 4.5.1: Baseine- remove text Hedgerows, drains and ditches are designated as landscape features which must be retained under the single (basic) payment scheme, and as such form part of the eligible area for payment
51	Action 4.5.2 Baseline NEW TEXT: Consideration <b>and implementation</b> of appropriate recommendations on the protection of habitats and species including Eel, <b>OSPAR</b> SalmonOSPAR, NASCO and EIFAAC (European Inland Fisheries and Aquaculture Advisory Commission)
51	Action 4.5.3- add <b>All-Ireland</b>
52	Action 4.5.4 Comment Action :Identify and implement measures to substantially reduce Ireland's ecological footprint on biodiversity
51	Action 4.5.4 No PI identified
52	Action 4.5.4 Performance Indicator: add Conservation status of biodiversity
51	Action 4.5.4 This action appears to summarise the entire NBAP. It is considered to be far too general and should be clarified or removed.
51	Action 4.5.4: Suggest this action contains a typo – at present it is nonsensical.
53	Action 4.6.1 Actors/Key Partners: add NPWS?

Page	Comment
52	Action 4.6.1- Actors and Key partners- plus DAH, Dept of Agriculture and perhaps Dept of Justice
52	Action 4.6.1- Baseline- CITES is the Convention on International Trade in Endangered Species of Wild Fauna and Flora
52	Action 4.6.1-This should include An Garda Siochana, Revenue's customs service and the Dept of Agriculture (as they implement the EU timber Regulation)
52	<p>Action 4.6.2</p> <p>Members of the public should be encouraged to report crimes under the Wildlife Acts or Habitats Regulations. Relevant information should be made available on the Department's website, including examples of activities that are illegal, and details of government departments that should be informed. Key areas for public reporting would include: burning of vegetation during the bird nesting season, persecution of protected fauna (e.g. badgers, bats, hares), use of poisoned bait for birds and foxes, etc</p>
52	Action 4.6.2 No PI identified
52	Action 4.6.3- Performance Indicators- I think another important indicator is the number of targeted operations or investigations. This should be separated from the number of seizures or prosecutions.
53	Action 4.6.4 and 4.6.5 No PI identified
44	Action4.1.5 NEW TEXT: Add 4. Development and use bird Forestry Sensitivity Map to aid in the assessment of sites for future afforestation.
	An additional action under target 4.4 could be provided to include the requirement for Departments, Sectors and Agencies to develop IAS policies wrt movement, prevention, containment and eradication. Measures can include the referred to ISPM no 15, Biosecurity, plant source traceability. It may be useful to also have two separate actions under target 4.4 for the fishing and aquaculture sectors and the quarrying sectors with regard to preventing the spread of IAS from quarries along road infrastructure and preventing the spread along aquatic corridors and drainage channels.



Page	Comment
	Below lists some of the objectives, targets and actions from the draft 3rd National Biodiversity Action Plan that SECAD is happy to support. The implementation of some of those listed SECAD through its current and planned activities, is already contributing to or plans to contribute to on the ground. SECAD would welcome the opportunity to contribute to implementing
	COMMENT Conservation and restoration opportunities for our native biodiversity – Objective 4 – are of paramount importance. Waterways Ireland has fully endorsed and partnered with the All Ireland Pollinator Plan 2015-2020 (Action 4.1.9) and successfully implemented a suite of actions in 2016. This involved changing maintenance works along our waterways to help promote floristic diversity of benefit to pollinators and grant aiding a number of community groups through our
41	COMMENT With regards to Objective 4 I have the following observation: This section does not include any mention of the Freshwater Pearl Mussel Regulations, which are not being implemented at present. I think it would be appropriate to include an action such as the publishing and review of sub basin management plans for the species. The original plans are still at draft stage and have not been reviewed within the timeframe required by regulations.
41	Curlew: The stark decline in Curlew, and other breeding waders in Ireland, has been well documented and communicated in recent years by BirdWatch Ireland and others. There is a very urgent need for a Threat Response Plan for Curlew. This must make provision for peat bog restoration and management, screening of afforestation licencing, farmland management. An additional action in this section is thus to Develop a TRP for Curlew by the end of 2017 and put in
Survey Monkey	<b>Do you have any feedback on Obj 4?</b> Should be done through a Scheme ,Leader or DAFM
51	END OF TARGET 4.5 SUGGESTION: Need to include an Action related to identification, testing, implementation and monitoring of biodiversity enhancement strategies in key habitats

Page	Comment
Survey Monkey	Farming communities need to feel that biodiversity is of benefit to all. This requires efforts through fairs and other events to provide information on the value of biodiversity and the essential role of a healthy environment
Survey Monkey	How are you going to conserve bogs from peat cutters. It would seem that so far, it's failed in the light of local opposition.
Survey Monkey	How can you have rural development without the use of OUR BOGS this can only happen with the consent of the Irish people.
47	In relation to Target 4.3 (Flood Risk Management Planning), Mountaineering Ireland draws attention to the relationship between habitat condition in upland catchments and flood risk downstream. Evidence from the UK suggests that measures such as drain-blocking in upland areas can mitigate flooding and also contribute to improvements in biodiversity, water quality, and carbon storage, which in turn can be beneficial for wildlife, health and wellbeing, recreation, and jobs (SEPA, 2015).
email	It is noteworthy that the above projects will also assist in achieving objectives 2,3 and 4 so strengthening the knowledge base, increasing awareness and conserving and restoring ecosystem services in the wider countryside. 1. ILI would be willing to assist in achieving these objectives and are available in order to assist the NPWS through our BGI WG and linkages to IFLA.

Page	Comment
Survey Monkey	Local Authority Heritage Officers and Biodiversity Officers have a key role to play in the conservation and restoration of biodiversity and ecosystem services in the wider countryside and associated actions. Greater action for biodiversity can be achieved through providing ring fenced funding and support for the implementation of Local BAPs and the appointment of Biodiversity Officers at local level.
49	Mountaineering Ireland respectfully requests that NPWS input to the Helping the Hills capacity-building programme be included under target 4.5, or perhaps under objective 6. The initiative aims to build up
45	New Additional Action 4.1.11. If suggestion for overall strategic plan for HNV farmland as suggested above (Action 1.1.11) is incorporated under objective 1 of NBAP then there is need for an action under objective 4 for implementation of this plan. The need for a strategic plan for HNV farmland is further emphasised by the fact that HNV farmland has the potential to deliver for biodiversity across both objectives 4
41	Objective 4 - Conserve and restore biodiversity and ecosystem services in the wider countryside Mountaineering Ireland is pleased to see the reference to High Nature Value (HNV) farmland and the development of measures to maintain its biodiversity.
Survey Monkey	One of the tragedies has to be the black hell created by Bord na mona, how they are allowed to continue this decimation of such a huge area I do not know...it's horrific! Over the east there are the massive lifeless fields, with not a bird, hedge or anything other than a monocrop in sight...sprays, poisons and chemicals the normal diet of that soil and of those who eat those crops. I would have to also say that the continued abuse of our water system country wide is shocking...stop the contracts with chemical companies, straight away! We live in a rural area and the farmers are putting awful chemicals and poisons down in the fields that they keep sheep, it has killed off the owl population...probably much more and we can't even let our cat outside as our neighbours cats and dogs have been poisoned.
51	Regarding Objective 4.5.4, if urban areas are considered relevant to Section 4, Baseline paragraph 2 should include Fáilte Ireland's membership of DBBP.

Page	Comment
Survey Monkey	Reverse the increase in time allowed to cut hedgerow. Reduce the National herd, diversify to more carbon neutral farming. Strictly monitored protection of inland waters from agricultural and industrial pollution. Protection of streams for acidification from pine forestation.
42	<p>See comment in relation to Targets 4.1 and 6.1- Targets 4.1 and 6.1 are key and highly challenging; and in the case of 6.1 the breadth of actions proposed are very limited and highly unlikely to achieve the target. They are limited largely to peatlands, forestry, woodlands, agricultural subsidies and birds.</p> <p>The actions must include those for decision makers (eg consenting forestry), should include protection of change of land-use without consent and the need to include targeted restoration beyond peatlands. Proposing to achieve 'no net loss of biodiversity' largely through generic agri-environment schemes will be likely to result in no net loss of generic habitats / species and will not take account of biodiversity that is specific to an area or important from a strategic perspective.</p> <p>There is probably a need to link Targets 4.1 and 6.1 so that the 'no net loss' policy is appropriately targeted.</p>
41	<p>Suggested rewording of last paragraph page 41.</p> <p>“Target 4.1 focuses on the role of agricultural, rural development, forestry and peatland policies and strategies. A central priority of the Irish RDP is restoring, preserving and enhancing ecosystems related to agriculture and forestry. Ireland will continue to develop and implement agri-</p>
44	<p>Target 4.1.5 CONTEXT</p> <p>Non-native conifer plantation forestry has significant negative long-term effects on certain Raptor populations in Ireland. International research corroborates this assertion and provides evidence that plantation forestry is a driver of population decline within a wider guild of upland avi-fauna through habitat loss, predator /edge effects and direct/indirect disturbance.</p> <p>In the example of the Hen Harrier, forestry is proven to limit productivity and be the</p>
46	<p>Target 4.2: ADDITIONAL ACTION To encourage local based soft or green adaptation measures to be carried out by local groups. Training etc to be provided for this too</p>

Page	Comment
46	Target 4.2: Principal pollutant pressures on terrestrial and freshwater biodiversity substantially reduced by 2020 A specific action is required to address the increase in diffuse and point source agricultural pollution
48-49	Target 4.4 No mention of Invasive Species Ireland's role/guidelines/website etc.
48	Target 4.4 The lack of any national coordination in tackling invasive species, the lack of funding and limited powers to enter private property to deal with invasive species are some of the key obstacles in rolling out effective control programs for a range of invasive species in Ireland.  DAH is listed as the key actor in this target, but so far DAH has shown no interest or capability in dealing with invasive species. Invasive Species Ireland has not been active in years due to lack of resources. So unless dedicated staff are made available in DAH or in another Department or agency to lead a coordinated strategy of control and eradication, the frustrating haphazard approach to invasive species control will continue.
50	TARGET 4.5 COMMENT I fear that this date will be far too late for many parts of Leinster where mowed grass verges, sans flora, is becoming the norm for new generations. Information needs to begin immediately to prepare for effective action & management
49	Target 4.5 There should be an action here implementing the programme of restoration activities that was developed in Action 2.1.23

Page	Comment
49	<p>Target 4.5: Effective management and restoration in place for biodiversity and ecosystems in the wider countryside by 2021</p> <p>The July draft of the NBAP contained two actions which have since been removed from this target. The action “4.10.2 Maintain target of 30% broadleaf planting in afforestation” should be reinstated. It’s an important element of our national biodiversity strategy. There should be an assessment of the biodiversity benefits of how the 30% target is used.</p> <p>In plantations on improved / enclosed land there is an obligation to plant a minimum of 10% broadleaves, site permitting. This usually results in a border of birch around a block of Sitka spruce. From a biodiversity perspective it may be more beneficial to plant the 10% broadleaves in one block and for there to be an obligation to use more native species than just birch in the mix.</p> <p>A target for broadleaf planting in sites that are being replanted should also be set.</p> <p>In areas which are not deemed suitable for broadleaves then Scots pine should be planted instead.</p> <p>The action; “4.10.3 Continue to update the inventory of native woodlands review and, where appropriate the results of the Native Woodland Survey into conservation and expansion of the native woodland cover,” should also be included in the final NBAP.</p> <p>There was also a comment within the draft that “We need a Forestry Service overview of their Biodiversity Actions 2017-2021”.</p> <p>Actions from the Forestry Service Action Plan should be included in the NBAP. The Forestry Service should operate in a way which is compatible with the NBAP</p>

Page	Comment
52	Target 4.6 Comment: A national database of incidents of wildlife crime, including illegal hunting, trapping, nest destruction etc is urgently required... Currently existing in a vacuum except for raptor scheme.
52	Target 4.6 There needs to be a new target specifically mentioning the EU action plan against wildlife trafficking which we will be obliged to implement and this will be tied into the new national CITES enforcement plan (2017 - 2021) that is in preparation.
52	Target 5: ADDITIONAL ACTION To support local groups and eNGOs in management and restoration projects for species and habitats e.g. Grey partridge, red grouse, Corncrake, Little Tern etc
Survey Monkey	Targets 4.1 and 6.1 are key and highly challenging and, in the former instance, the breadth of actions put forward are very limited and are highly unlikely to achieve the target (in as far as they go, they are limited largely to peatlands, forestry, woodlands, agricultural subsidies and birds. The actions must include those for decision makers (eg consenting forestry), should include protection of change of land-use without consent and need to include targeted restoration beyond peatlands. Proposing to achieve 'no net loss of biodiversity' largely through generic agri-environment schemes will be likely to result in no net loss of generic habitats / species and will not take account of biodiversity that is specific to an area or important from a strategic perspective. There is probably a need to link Targets 4.1 and 6.1 so that the 'no net loss' policy is appropriately targeted. Specific targets need funding to secure their delivery. For example, a target for state bodies to have biosecurity plans is not deemed a suitable target without provision of appropriate funds.
Survey Monkey	The BSBI fully supports this objective.

Page	Comment
Survey Monkey	The entire microbiota is missing from this Objective. Research into human immune disorders seems to increasingly show the role of bacteria to be crucial. Chemical manufacturers are increasingly retailing bacteriacidal agents (witness TV ads for home sterilisation). Injection into the environment must have reached 1000s of tonnes per annum, but the impact is neither proposed to be measured or controlled in Objective 4 nor in the wider Plan. This will undoubtedly lead to major microbiota change which the plan does not address
Survey Monkey	The projects identified in our comments on Objective 7 will also assist in achieving the respective themes in Objectives 3
51	The wording of action 4.5.4 seems unclear and in the draft plan this action lacks both performance indicators and a timeframe.



Page	Comment
	<p>There are a number of observations to make here.</p> <p>“Forest cover has increased in Ireland in recent years under various Forestry Programmes, but only about 16% of Ireland’s forests comprise woodlands with more than 80% native species. However, a further 12.7% of forests comprise woodland with 20-80% native species, and many of these woodlands have a high degree of 'nativeness'.”</p> <p>The above passage gives an overly positive impression of the status of native woodland in Ireland. Currently, native tree species comprise less than 25% of the forest stock. Only around 2% of the country is covered by what is termed native or semi-natural woodland, and much of this is highly fragmented and modified. 1</p> <p>Ireland’s native woodland cover is amongst the lowest in Europe. What protected native woodland remains is being degraded by invasive species and diseases such as ash dieback.</p> <p>This reinforces the vital need to follow through on the following point, “It is only possible to reduce or halt the loss of biodiversity if the drivers of pressures on biodiversity are themselves reduced or eliminated.”</p> <p>The main threats and pressures on Ireland’s biodiversity have been clearly identified over the course of the previous two National Biodiversity Action Plans. The task of this NBAP must be to take concrete actions to reduce or eliminate these threats and pressures.</p> <p>The NBAP reads;</p> <p>“According to Ireland’s report to the EU on the condition of habitats and species of European interest, the main pressures and threats to biodiversity are: agricultural intensification, natural system modifications (drainage, burning, reclamation, coastal protection), invasive and problematic species, and human intrusion and disturbances.”</p> <p>On this point, the threats and pressures identified by the Habitats Directive in the Article 17 report on The Status of EU Protected Habitats and Species in Ireland, Habitat Assessments NPWS (2013) should be used as the basis to address biodiversity loss over the course of this NBAP.</p> <p>The 2013 Article 17 report contains a standardised list of pressures/threats ranked in hierarchical order. This includes a standardised list of high level categories for pressures and threats. These are Agriculture, Forestry, Mining (Including mechanical peat extraction), Transportation, Urbanisation, <u>Other Biological resource use Mainly hunting, fishing, aquaculture related</u>, Human intrusion and</p>
42	<p>Under target 4.1, we suggest that the implementation of the Heritage plan of Waterways Ireland and the species action plans by Coillte be included as actions under this target. Furthermore, we recommend that urban biodiversity actions be included under this target too.</p>

Page	Comment
Survey Monkey	We have been working with DAFM on action 4.1.8. on genetic conservation of agricultural plants for several years (fruit, vegetable and grain). As is stated in the baseline paragraph: "A plant conservation strategy has not yet been finalised although initial studies have been undertaken on crop wild relatives and landraces)". We hope to be included in the development and implementation of such a strategy between 2017 and the target date of 2020. As the main National organisation focusing on conservation of agricultural plant diversity (Since 1991), we are in a strong position to develop and implement such a strategy, in cooperation with the Department of Agriculture Genetic Resources staff with whom we have a close working relationship, and a track record of delivering on conservation targets: We are part of the Advisory Committee for Genetic Resources which meet at Backweston to liaise with DAFM, and we work directly for DAFM to achieve annual conservation targets for Irish agricultural plant varieties (fruit, vegetable and grain). We contributed to the publication (listed in the NBAP as reference 86): Curtis T. Report on the Production of a Genetic Conservation Strategy for Plants in Ireland: Crop Wild Relatives and Landraces.; 2014). We suggest we should be explicitly named as a 'Key Partner' for this action (4.1.8).
Survey Monkey	While agriculture, forestry and peatland sectors do well here in terms of attention, some sectors don't seem to be represented– e.g. urban, coastal, quarrying, roads, etc. etc.
Survey Monkey	Will only work if all government bodies take responsibility, rather than passing on the task to another department. For example I reported illegal slurry spreading over Christmas to the fishers department they told me to contact the department of agriculture who were closed over Christmas, all of the slurry spread is now in the Shannon estuary. No action taken
43	With regard to action 4.1.3 Mountaineering Ireland believes that it is important to specify blanket bog within the areas targeted for peatland restoration, and to separately measure the areas of raised, lowland and upland blanket bog restored. This also links back to action 2.1.23. There may be useful lessons to be learnt from the many peatland restoration projects carried out in the UK.

Page	Comment
49	With regard to action 4.4.3, and particularly for public bodies, perhaps the wording could be adapted to suggest that such bodies be obliged to use native species in planting schemes wherever possible.
49	With regard to action 4.5.1, would we be correct in understanding that as the amendments to Section 40 of the Wildlife Act proposed by the Heritage Bill 2016 have not been enacted, that this action would be removed if this is still the case by the time of a finalised 3rd National Biodiversity Action Plan being published.
47	With regard to target 4.3, we feel it would be of major benefit that there be a programme of education to raise public awareness of the benefits of re-naturalising river systems in flood risk management.
48	With regard to target 4.4., while the horticultural sector is specifically mentioned the pet trade can be a particular risk sector with regard to the spread of invasive species, not only animals but also plants. A particular risk is the disposal or dispersal of plants used in aquaria and ponds. Unregulated petting zoos in open farms also have the potential to be a source for escapes of alien species.
49	With regard to target 4.5 the B Team has knowledge and experience of trail development and we feel that opportunities can be created to enhance biodiversity in the development, management and maintenance of recreation resources, for example, in trail developments.
43	With respect to action 4.1.2, in addition to this action there should be an action referring to my suggestion in point 2 c above.

Page	Comment
45	<p>With respect to action 4.1.8, there are no indicators present. Included in the indicator should be indicators to improve on current measures for plant and seed traceability from agricultural end use back to supplier and importer.</p> <p>e. There may be room for an additional action for the agricultural sector that promotes and rewards participation in awareness programmes at farming community level . The programmes could educate on activities and risk areas related to sediment run off, eutrophication and nutrient enrichment of both aquatic and soil habitats and why it matters. Prevention reduction and mitigation courses could be a second phase of programmes. The programmes could also focus on biodiversity consequences of re-seeding, inappropriate weed control, fertilising, drainage and liming.</p>
46	<p>With respect to action 4.2.1, there should also be a reference or separate action on researching actual effectiveness of water impact mitigation measures deployed in agri and forest grant aided schemes. Research issues to look at could include appropriate design and correct construction at deployment stage and maintenance effectiveness after deployment and during high rainfall events, and in the context of Climate change.</p>
48	<p>With respect to action 4.4.1, DAFM are actors and key partners also. It could be improved by including performance indicators on public funded plant/seed traceability (already outlined); on requirements for ISPM no. 15 standard wood packaging bought with public funds; on biosecurity requirements and audits of plant maintenance machinery and their operatives.</p>
49	<p>With respect to action 4.4.3, Indicators could include quantities of nurseries supplying traceable documentation of irish provenance plant material.</p>
51	<p>With respect to action 4.5.3, There is a need to consider the same action for other species including not well known species eg floral species, insects and declining habitats. If species action plans are not present then an inventory of what to prioritise should be provided and reviewed every 5 years inline. Focus of priorities should look beyond large iconic species and include diminutive species or not well known or regarded species.</p>
51	<p>With respect to action 4.5.4, I find the action not well worded and I do not understand its meaning. Also performance indicators are missing. Is it referring to recreation and disturbance issues by human activity?</p>

Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Objective 5	
Page	Comment
	I suggest there should be a specific action to combat plastic pollution of our marine and aquatic resources, indicators should include reduction and awareness campaigns with possible taxation penalties on use-once plastic items.
54	1st Paragraph -Comment in response to: In 1991 the Irish Government declared all Irish waters to be a whale and dolphin sanctuary highlighting the importance of these animals.
55	1st Paragraph NEW TEXT: . In 1991 the Irish Government declared all Irish waters to be a whale and dolphin sanctuary highlighting the esteem in which these animals are held.
54	1st Paragraph- Target 5 NEW TEXT: Ireland has a unique wealth of marine biodiversityfrom its inshore waters to the ocean depths and its marine Exclusive Economic Zone (EEZ) is considerably larger than its land area
54	3rd Paragraph -Comment in response to : Pressures from human activities on Ireland’s coastal and marine biodiversity and ecosystem services arise from a growing range of sources including nutrient and chemicaldischarge from <u>terrestrial ecosystems</u>
54	3rd Paragraph -Comment in response to: Fishing has widespread impacts on both pelagic
54	3rd Paragraph Comment in reponse to: Fish populations are generally improving since reform of the Common Fisheries Policy (CFP) and more sustainable management of fish populations with the setting of Maximum Sustainable Yield (MSY) for commercial species102
55	3rd Paragraph NEW TEXT: Pressures from human activities on Ireland’s coastal and marine biodiversity and ecosystem services arise from a growing range of sources including nutrient and chemicaldischarge from terrestrial ecosystems and through direct physical disturbance and habitat degradation from pollution, litter and man-made noise and light.
54	3rd Paragraph- NEW TEXT: Climate change and ocean acidification present considerable threats to the marine environment and may modify effects of other pressures and facilitate further establishment and spread of invasive species.
54	4th Paragraph Comment in response to: The European Maritime Fisheries Fund (EMFF) contains measures such as investments in the protection and restoration of marine flora and fauna, improvements to the selectivity of fishing gear, and schemes to improve the environmental performance of aquaculture farms.

Page	Comment
54	4th Paragraph- NEW TEXT: The development and implementation of effective Marine Spatial Planning for Ireland's coastal zone and EEZ waters will assist in the identification and improved protection of pressurised or threatened habitats and species, in accordance with the EU Maritime Spatial Planning Directive
55	<p>5.1.2. Implement measures to achieve good ecological and environmental status of marine and coastal habitats as required by the Habitats, Directive, Water Framework Directive and Marine Strategy Framework Directive (MSFD) and in line with the OSPAR Convention</p> <p>The Number of Blue Flag beaches is listed as a performance indicator. The number of Green Coast Awards could also be considered as a performance indicator. Both programmes are run by the Environmental Education Unit (EEU) of An Taisce. The EEU should be added to the list of Actors/Key Partners. In particular the Clean Coasts and Blue Flag programmes have a number of campaigns which complement the objectives of this action.</p>
55	<p>5.1.3. Support, build capacity of and co-ordinate the citizen science network for near-shore and inter-tidal ecological monitoring</p> <p>There are 519 Clean Coasts groups around the Irish coast. These community groups have an established track record in coastal environmental conservation <a href="http://cleancoasts.org/">http://cleancoasts.org/</a></p> <p>Clean Coasts should be added to the list of Actors/Key Partners</p>
56	<p>5.1.4 We are very supportive of this action. We do suggest however, that a best practical guidance document be produced to show how ecological features and engineering can be incorporated in coastal defence structures. Furthermore, a number of demonstration sites are to be established (if not already present) to provide a practical example to OPW, Local Authority and Consultancies staff involved in designing, commissioning and maintaining coastal defence structures. It is therefore suggested that in the Performance indicators that the following two PI's be included:</p> <p>Prepare guidance document for OPW and Local Authorities</p> <p>Establish demonstration sites to showcase ecological engineering in coastal defence structures</p>

Page	Comment
56	<p>5.1.4. Promote the incorporation of ecological engineering features in new and existing structures such as coastal defences</p> <p>An Taisce strongly supports this action.</p> <p>Adding research institutes to Actors/Key Partners should be considered.</p>
56	<p>5.2.1. Continue to ensure the Common Fisheries Policy (CFP) and marine fisheries provide for the conservation of fish species and marine biodiversity</p> <p>The Irish Government continue to successfully lobby the EU for fishing quotas which are not aligned with MSY and the Common Fisheries Policy. The failure of the Irish fisheries sector to sustainably manage our marine resources is not beneficial for coastal communities in the long run. Ireland must establish quotas which are aligned with the objective of restoring the marine environment and its resources. MSY is not an effective tool in itself to restore marine ecology. Marine protected areas must be established where trawling is banned.</p> <p>The addition of the performance indicator is positive “2. Accidental capture of non-target species under consistent and representative monitoring.”</p>
56	<p>5.2.2. Implement stock recovery plans for any fish stocks outside safe biological limits, and management plans to maintain other stocks at safe biological levels as determined by the standards for Good Environmental Status in the Marine Strategy Framework Directive</p> <p>Fishing quotas and fishing methods must be in line with achieving stock recovery and Good Environmental Status under the Marine Strategy Framework Directive.</p>

Page	Comment
56	<p>5.2.3. Adopt and implement provisions under Common Fisheries Policy (CFP) for the establishment of appropriate management measure, (e.g. no-take zones) that conserve biodiversity and fish stock levels</p> <p>According to the European Environmental Agency marine protected areas (MPAs) can act as a key conservation measure to safeguard marine ecosystems and biodiversity as well as the services these ecosystems provide. MPAs must be established in Ireland in consultation with local communities. Research must be carried out on the spin-off socio-economic benefits of MPA designation. These research findings should be communicated to local communities.</p>
57	<p>5.2.4. Take concerted action to combat illegal, unreported and unregulated fishing</p> <p>An Taisce supports this action. The two performance indicators are fit for purpose “1. Number of patrols. 2. Number of interceptions.”</p>
56	<p>Action 5.1 and 5.1.4: ADDITIONAL ACTION aimed at public bodies Local authorities, and In addition to the training above, target actions to raising awareness of and identify steps to avoid maladaptation</p> <p>measures of coastal and intertidal areas to avoid negative impacts on biodiversity</p>
55	Action 5.1.1- Action NEW TEXT: Develop and implement a Marine Spatial Plan for Ireland
55	Action 5.1.1-Actors Key Partners: Add DHPCLG
55	Action 5.1.2 Comment Baseline in response to : The Programme of Measures under Article13 of the MSFD was submitted to the EU Commission in July 2016
56	Action 5.1.2 NEW TEXT: Implement measures to achieve good conservation, ecological and environmental status
55	Action 5.1.2 The PI mentions measures under the MSFD however will this be sufficient for habitats and species outlined in the Habitats Directive? If not include a separate PI.



Page	Comment
55	Action 5.1.2. Implement measures to achieve good ecological and environmental status of marine and coastal habitats as required by the Habitats, Directive, Water Framework Directive and Marine Strategy Framework Directive (MSFD) and in line with the OSPAR Convention.
55	Action 5.1.3 Actors under this section might also include BWI as bird survey monitoring extends to near shore and intertidal waters
56	Action 5.1.3 Actors/Key Partners: add BWI
55	Action 5.1.3 Comment Baseline in response to: BirdWatch Ireland
55	Action 5.1.3 Observation: This is an important action which fills a real gap in knowledge, and responsibilities of partner organisations. The Data Centre is well positioned to provide co-ordination in this area, and has the in-house expertise to provide advice and co-ordination. Rolling out Irish modules of 'Capturing our Coast' initiative is a very efficient and cost effective means of filling many gaps of ecological monitoring in this area. The Data Centre can provide this co-ordination and structure, however, additional dedicated resources are required. This could not be done under a 'business as usual' scenario for delivery of the Data Centre work programme 2018-22.
55	Action 5.1.3 Support, build capacity of and co-ordinate the citizen science network for near-shore and inter-tidal ecological monitoring. ☐
56	Action 5.1.4 Training is required for the sector
56	Action 5.2.1 Comment in response to: Continue to ensure the Common Fisheries Policy (CFP) and marine fisheries provide for the conservation of fish species and marine biodiversity
	Action 5.2.1 Comment Performance Indicators: stocks fished within their maximum sustainable yield (MSY)
56	Action 5.2.1. Continue to ensure the Common Fisheries Policy (CFP) and marine fisheries provide for the conservation of fish species and marine biodiversity. ☐
56	Action 5.2.2 Comment Baseline in response to: For stocks fished in Irish EEZ, there are a number of long-term management plans and recovery plans including: West of Scotland Cod, Irish Sea Cod and Northern Hake, NEA mackerel, NEA Blue whiting, Herring Vln, North Sea and west of Scotland Saithe and Herring
56	Action 5.2.2 NEW TEXT Performance Indicators: Add – using number of fish stocks restored and maintained above biomass levels capable of achieving MSY

Page	Comment
56	Action 5.2.2. Implement stock recovery plans for any fish stocks outside safe biological limits, and management plans to maintain other stocks at safe biological levels as determined by the standards for Good Environmental Status in the Marine Strategy Framework Directive. ☐
57	Action 5.2.3 Comment Baseline in response to: No take zones for benthic-impacting fishing gears are being considered in inshore Natura 2000 sites to protect sensitive habitats.
57	Action 5.2.3 NEW TEXT Performance Indicators: Add 2. Technical measures e.g. gears that reduce fishing mortality and/or unwanted bycatch particularly in mixed fisheries 3. Ensure that setting of TACs is based on scientific advice and the socio-economic arguments to fish above the advice is only used where there is evidence to support real long-term impact ☐
56	Action 5.2.3. Adopt and implement provisions under Common Fisheries Policy (CFP) for the establishment of appropriate management measure, (e.g. no-take zones) that conserve biodiversity and fish stock levels.
57	Action 5.2.4 NEW TEXT Performance Indicators; Add 3. provision of annual reports detailing information on IUU cases; etc.
57	Action 5.2.4 Take concerted action to combat illegal, unreported and unregulated fishing. Action 5.2.4 Take concerted action to combat illegal, unreported and unregulated fishing. ☐
55	ADDITIONAL ACTION Training and advice is needed for planning sections of coastal local authorities to ensure planners, trained in terrestrial planning, are acquainted with the dynamic nature of the marine/maritime environment as well as specific issues on coastal stretches
Survey Monkey	Awareness and engagement with the public should be included here if it going to be left out of objective 3.
	COMMENT Though outside our remit, Waterways Ireland fully endorses the measures outlined to protect our marine biodiversity (Objective 5).
54	Consider the use of the term “maritime” re Maritime Spatial Planning in line with common useage in other arenas for ease of understanding
Survey Monkey	Do you have any feedback on Obj 5? A Scheme as above ( see Obj 4 comment)
Survey Monkey	Given the pollution of fish farms, i'm surprised this is even on the agenda. When will the lack of sewage facilities be tackled.

Page	Comment
Survey Monkey	How can we have Substantial progress made towards “good ecological status” of marine waters over the lifetime of this Plan. When Europe has been striping our waters of OUR FISH for decades.
Survey Monkey	I'm very doubtful anything will be done in this department due to the resent failure to reduce over fishing in Irish waters
Survey Monkey	Large factory fishing boats.Super trawlers must be banned from our waters, smaller fishing communities protected for sustainable fishing over super trawlers that Australia and other nations have banned from their waters. Protection over the over expansion of Shipping and ports, the damage from dredging and infil.Tertiary sewage treatment. Banning of microbeads. Protection from the over collection of shellfish. Protection from nuclear waste in the Irish sea from the UK.
Survey Monkey	No clear committment to have zero raw sewage discharge to sea- a requirement that is nearly 20 years old that we still are not meeting.
Survey Monkey	Plastic and other waste is damaging the marine environment, awareness needs to be increased on this. Also I do feel very strongly about the continuation to put chemicals in the water supply, one of the councillors wanted to take action about it but apparently their hands are tied unless it is decided on a national level...this goes for phosphates (in washing liquid), aluminium, hydrofluorosilic acid, sodium hypochlorite as well as all the awful pesticides still used around the county that end up in the water and marine environment. Councils should be held accountable for damage to the environment and damage to health.
Survey Monkey	Please refer to supplementary information.

Page	Comment
29 & 55	Regarding Objectives 2.1.9 and 5.1.3, DBBP can commit to being an actor/key partner. DBBP will support volunteer recorders and Citizen Science projects from 2017-2020 by hosting training events, promoting participation in events and surveys and by producing supporting materials. The performance indicator is the number of projects supported where data is gathered by volunteers/citizen scientists. For example, DBBP hosts NBDC training workshops and supports the Coastwatch Survey by hosting events, promoting participation in the survey and printing supporting materials. From 2017-2019, DBBP will fund and provide additional supports for a BirdWatch Ireland Citizen Science project to gather data on Brent Geese numbers and feeding locations.
Survey Monkey	Same as Objective 6, with runoff
Survey Monkey	Stop poisoning our waters by spreading sludge from water treatment plants directly on to our lands and pretending that it nourishes the land. Publish the known health risks of the application of this toxic material and admit that there are chemicals in this sludge which are not tested for. Also, stop referring to this material as "organic biosolids"
Survey Monkey	The Green Party has repeatedly expressed concern over the impact of inadequate municipal waste-water treatment as well as run off from agricultural sources. This will need to be seriously addressed if we are to reach 'good' ecological status. Increased monitoring and strict enforcement of waste-water legislation, in particular relating to domestic treatment is vital. <sup>1</sup> Adequate funding is vital also, and the Green Party has consistently stated its support for progressive metered water charges on usage above a minimum free daily allowance of 50 – 100 litres.
Survey Monkey	The pollution from oyster farming is huge - the big black metal bags are strewn all over the strands, the dangerous and unsightly metal cages and poles cover the beaches – it is dangerous for wildlife, for sea animals & birds, for sea weeds & coastal meadows. It upsets the natural environment - unnatural reef formation occurs in oyster farm areas, which is harmful to native sea life. Invasive alien oysters subject to disease such as herpes. Overall habitat degradation due to the overwhelming numbers of oysters & physical environment change brought in. Look at what happened with salmon farming - the destruction of the wild salmon & sea trout, infestations of sea lice - and farmed salmon so polluted with chemicals and antibiotics (even the "organic" farmed salmon).

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Objective 6	
Page	Comment
58	3rd Paragraph Comment in response to whole paragraph: Is this section only referring to the AR 17 assessment or is there info for the Birds Directive (AR 12) reporting also included here? Please review and clarify
58	4th Paragraph Comment in response to: Where the Marine Strategy Framework Directive is concerned Ireland's existing network of Marine Protected Areas (MPAs) has an important role to play in the maintenance of biodiversity and achievement of Good Environmental Status (GES) by 2020 as required by the Directive.
59	6.1.1 The action states that by 2018 the designation process of SAC and SPA's is complete. Yet in the timeframe column, a timeframe for implementation is given for 2017-2020. It is recommended that the timeframe be amended to 2018. It is recommended that the total number of SACs and SPAs for which the designation process is to be completed are to be included in this action. This will give a clear indication of the workload involved for DAH and DCCAE to achieve this.
59	6.1.1. By 2018 complete designation process for Special Areas of Conservation (SACs) and Special Protected Areas (SPAs), in particular, for marine coastal and offshore SACs An Taisce strongly supports this. Designation should be based on scientific criteria.
59	6.1.2 It is unclear why this action is required. There are already consent systems in place to facilitate activities within Natura2000 sites by means of the notifiable action form process and the statutory planning process. Accordingly, this action should probably be rephrased to cater for the marine environment specifically as the consent process for activities in the marine environment is very complicated. If this action also applies to terrestrial designated sites, we suggest that the action be amended to To amend existing consent systems or to streamline existing consent
59	6.1.2. Develop and utilise consent systems to facilitate sustainable activities within Natura 2000 sites The Forestry and Aquaculture consent process are not functioning. Self-regulation has resulted in a
59	6.1.3 It is recommended that the total number of SACs and SPAs for which the site specific conservation objectives are to be developed are to be included in this action and how many are to be developed during the plan period. This will give a clear indication of the workload involved for DAH and DCCAE to achieve this.

Page	Comment
59	<p>6.1.3. Prepare detailed site-specific conservation objectives for Natura 2000 sites</p> <p>This is one of the most important actions in the NBAP. This is essential to ensure that the Natura 2000 network can deliver on its potential. Detailed conservation objectives also require detailed management plans and the funding to implement them.</p> <p>There is no ambition set out in this action to implement site-specific conservation objectives. Over the life of this NBAP there is only an obligation to prepare conservation objectives. There must be a commitment to implementing site specific conservation objectives and management plans.</p> <p>There should be a performance indicator which states that X amount of sites will have site specific conservation objectives by 2021. ?</p>

Page	Comment
59	<p>6.1.4 Implement the National Raised Bog Special Areas of Conservation (SAC) Management Plan (2016-2021)</p> <p>The performance indicator for this action reads “A system of management devised and implemented that will ensure turf-cutting on protected bog sites continues only in such a way that will not threaten the integrity of SACs.” Facilitating turf cutting in the some of the most important habitats left in the country is incomprehensible. Turf cutting should cease in all Natura2000 sites, NHAs/pNHAs. Domestic turf cutting should be subject to regulation. Alternatives to turf must be developed to move away from this extremely damaging source of fossil fuel. Agroforestry and permanent cover native woodland should be encouraged.</p> <p>We suggest that the title of 6.1.4 should be changed to “Implementation of National Raised Bog Special Area of Turf Cutting Management Plan.”</p> <p>The Turf Cutters and Contractors Association should be added to the list of Actors / Key Partners.</p> <p>We suggest that a performance indicator is included which indicates the number of bogs within the SAC network which have had conservation measures such as drain blocking carried out on them.</p> <p>The number of bogs which still have unauthorised turf cutting on them should also be considered as a performance indicator.</p>

Page	Comment
60	<p>6.1.5. Review the conservation measures necessary to achieve the published conservation objectives for Natura 2000 sites. If current measures are not adequate, develop and implement additional measures necessary to achieve favourable conservation status both nationally and at site level including for non-farmed habitats</p> <p>Performance indicator 2 reads “Improved conservation status of habitats reported to EU.”</p> <p>There needs to be performance indicators which reflects the conservation status of Annex I species under the Birds Directive and Annex II species under the Habitats Directive.</p> <p>This action should tie in with Threat Response Plans, Species Action Plans, BirdWatch Ireland Action Plans etc.</p> <p>There should be a mechanism that ties this point in with the ongoing review of the effectiveness of agri-environment schemes.</p>
Survey Monkey	<p>6.1.6 Perhaps when referring to adverse effects caveat this with "significant" or "affecting conservation objectives" etc. 6.2.1 Number of connecting features is not a good indicator- need to know if they work!</p>
60	<p>effects from marine fisheries and aquaculture in and adjacent to Natura 2000 sites</p> <p>The National Strategic Plan for Sustainable Aquaculture needs to be updated to reflect the global explosion in the number of cases of lice (<i>Lepeophtheirus salmonis</i>) infestation in 2016. Global supplies of Atlantic salmon fell nearly 9% last year and are expected to fall during the first half of</p>
61	<p>6.2.1 It is not clear to us what this action means and how this is to be translated into a local biodiversity plan or County Development Plan. Is this action stating that an Ecological Network or Green Infrastructure is to be established at national and County level? Fingal County Council has produced such a network already and has incorporated this network in the County Development Plan. It is an approach that is common in continental Europe and has many benefits in terms of Planning and Biodiversity Conservation. However, a lot of effort is required to set up such a network at national and local level. Accordingly, this action needs to be re-worded to provide clarity on what is required under this action.</p>



Page	Comment
61	<p>6.2.1. Increase connectivity of the protected areas network using appropriate buffer zones, corridors stepping stones and/or, flyways</p> <p>This is a very important action. Fragmented populations are more vulnerable to losing genetic diversity and are at a higher risk of extinction. The need for increased connectivity will become all the more necessary as the impact of climate change intensifies. Linkages between designated sites are essential for maintaining the coherence of the network.</p> <p>Ireland has an obligation to strive to increase ecological connectivity.</p> <p>Article 10 of the Habitats Directive for example specifically refers to linear landscape features and stepping stone habitats: "Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features as those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species."</p> <p>There is no clear strategy that An Taisce is aware of what increasing ecological connectivity actually means in an Irish context. What increases connectivity for one species for example may not work or even be counterproductive for another. The potential of ecological corridors for habitat conservation in Ireland – A review, was written by Jervis A. Good back in 1998. This review suggested that "it is often preferable to consider the total permeability of the landscape rather than specific corridors, unless the latter are linear features like streams." Improving water quality and protecting and restoring existing habitats may be a more effective way of improving connectivity than focusing on linear habitat features. <a href="https://www.npws.ie/sites/default/files/publications/pdf/IWM2.pdf">https://www.npws.ie/sites/default/files/publications/pdf/IWM2.pdf</a></p> <p>Again it has to be said that weakening Section 40 of the Wild Life Act will not support this action. The way this action is presented there does not appear to be any mechanism to promote or enforce this action. The performance indicators are passive. This action would be best advanced by improving the protection afforded to habitats outside of designated sites and ensuring that the role habitats play in connectivity is considered in the planning process. One of the most straight forward</p>
62	<p>6.2.2. Extend the Marine Protected Area designation under the MSFD</p> <p>An Taisce would strongly support this. Comments made under action 5.2.3 are relevant. Benthic habitats which have been obliterated by trawling should be prioritised for protection.</p>

Page	Comment
62	<p>6.3.1. Provide and implement guidelines for Planning Authorities and other consent bodies on the protection of species listed in Annex II, IV and V and habitats in Annex I of the Habitats Directive including around preserving and increasing the connectivity of protected areas</p> <p>Please include an action which relates to Annex I bird species under the Birds Directive.</p> <p>Comments made under action 6.2.1 are relevant for “preserving and increasing the connectivity of protected areas.”</p>
62	<p>6.3.2. Identify and subsequently fill critical gaps in ex-situ conservation programmes for wild species, in line with best practice</p> <p>There are a number of freshwater species which would benefit from captive breeding such as Freshwater Pearl Mussel, Pollan, Arctic Char and Killarney Shad.</p> <p>Further reintroductions are not currently justifiable in the context of potential future extinction of multiple species within the next few decades. Conservation efforts should prioritise tackling the main drivers of habitat loss.</p>
63	<p>6.3.3. Review, update and publicise the National Plant Conservation Strategy including updating the strategy in line with current global targets</p> <p>There are a number of very good targets and actions within the National Plant Conservation Strategy. Achieving the implementation of many of its actions would be positive.</p> <p>There is no performance indicator for this action which would facilitate the implementation of any of</p> <p>the National Plant Conservation Strategies action over the life of this NBAP. A performance indicator should be adopted which seeks to achieve the National Plant Conservation Strategies targets/actions.</p>
58	<p>6th Paragraph NEW TEXT: The National Botanic Gardens and the Trinity College Botanic Gardens, the Irish Seed Savers’ Association, together with Ireland’s zoos and other private and State collections, play an important role as gene banks and living collections.</p>

Page	Comment
59	<p>Achievement of target 6.1 in relation to effective conservation management of Natura 2000 is inextricably linked to the effective management of HNV farmland in farmed Natura 2000 sites. It should be ensured that HNV farmland is integrated into actions on objective 6 as most of the SAC and SPA areas in Ireland are HNV farmland areas</p> <p>The above point highlights the need to ensure linkages among objectives e.g. objective 4 and objective 6 where appropriate. This is particularly the case for cross-cutting issues such as HNV farmland which is a European concern with the potential to deliver for biodiversity, water, soil quality and aesthetic landscapes if management is targeted towards realising specific objectives related to this farmland type.</p>
59	Action 6.1.1 NEW TEXT Baseline: Add MPA and marine reserve network to be established – including important areas for spawning/nursery areas for fish where fishing and recreational activities, for example, are more restricted for conservation purposes
59	Action 6.1.1 Performance Indicators Add: 2. Report the Marine SAC's into the OSPAR MPA Network
59	Action 6.1.1. By 2018 complete designation process for Special Areas of Conservation (SACs) and Special Protected Areas (SPAs), in particular, for marine coastal and offshore SACs.
59	Action 6.1.2 Comment Action : Develop and utilise consent systems to facilitate sustainable activities within Natura 2000 sites
60	Action 6.1.3 NEW TEXT Performance Indicators: Add 1.2. Number of management plans developed for SPAs and SACs.
60	Action 6.1.5 Actors/Key Partners: Add , local authorities, other public bodies who own/manage SACs, SPAs
61	Action 6.1.6 Actors/Key Partners: Add M.I., NPWS
60	Action 6.1.6 Implement measures to ensure that, taking account of climate change, there are no adverse effects from marine fisheries and aquaculture in and adjacent to Natura 2000 sites.

Page	Comment
61	Action 6.1.6 Performance Indicator; Add 3. Baseline surveys to assess the impacts of increased aquaculture (not just shellfish) and fishing operations on site interests including SACs. 4. Monitoring established for all fishing activities in SACs/SPAs (including recreational)
61	Action 6.2.1 Connectivity has differing meanings to people. Often it is viewed solely as connecting sites for human use with associated disturbance issues. It's important to identify the difference in habitat connectivity and that human access requires management and may even be undesirable.
61	Action 6.2.1 Consider the adoption of 'Local Nature Reserves' in Ireland?
62	Action 6.2.2 Action- Remove under the MSFD
62	Action 6.2.2 Baseline: Add MPA designation to be considered under the requirements of MSP and MSFD
62	Action 6.2.2 Comment in response to Performance Indicators: – . Number of additional areas designated
62	Action 6.2.2. Extend the Marine Protected Area designation under the MSFD. SWAN would also request to be included as a key stakeholder for the relevant actions. ☐
63	Action 6.3.1 Comment Performance Indicators: . New guides published for aquatic and terrestrial habitats and species
62	Action 6.3.2: Key players should list voluntary groups, gun clubs, Birdwatch here
62	Action 6.3.2. Actors / key partners, add Birdwatch Ireland & Birdlife International.
62	Actions 6.3.1 Any guidance needs to be underpinned with facilitating information and policy. The approach must be to have a targeted approach where features are noted as important (eg within County BAPs) and their strategic importance is understood (eg full connectivity for bats and minimum distances to other areas of

Page	Comment
	<p>below lists some of the objectives, targets and actions from the draft 3rd National Biodiversity Action Plan that SECAD is happy to support. The implementation of some of those listed SECAD through its current and planned activities, is already contributing to or plans to contribute to on the ground. SECAD would welcome the opportunity to contribute to implementing other actions and would welcome input on how we could do so from parties involved in developing the 3rd National Biodiversity Action Plan.</p> <p><b>TARGET 6.2: Sufficiency, coherence, connectivity and resilience of the protected areas network substantially enhanced by 2020</b></p> <p>6.2.1. Increase connectivity of the protected areas network using appropriate buffer zones, corridors, stepping stones and/or, flyways.</p> <p><b>TARGET 6.3: No protected habitats or species in worsening conservation status by 2020; majority of habitats and species in, or moving towards, favourable conservation status by 2027</b></p> <p>6.3.1. Provide and implement guidelines for Planning Authorities and other consent bodies on the protection of species listed in Annex II, IV and V and habitats in Annex I of the Habitats Directive including around preserving and increasing the connectivity of protected areas.</p> <p>6.3.3. Review, update and publicise the National Plant Conservation Strategy including updating the strategy in line with current global targets.</p>
	<p><b>Comment</b> In relation to Objective 6 Waterways Ireland would advocate the need for protection of designated sites. Waterways Ireland would like to open a conversation regarding measures which ensures their ongoing sustainable use. Many of these sites have multiple functions and the continued ecosystem services should not be in direct competition with the conservation interests, thereby ensuring a sustainable balance can be achieved.</p>

Page	Comment
Survey Monkey	Do NHAs get a mention? At a quick glance, I think not. This is a huge oversight, and they need to get a significant amount of attention in this plan. SACs and SPAs alone go nowhere near covering enough ground for adequate protection of species and habitats. This definitely needs to be rectified in the doc. In the Summary of this Objective, on pg 3, I feel a much stronger statement is needed. Could something like the following be incorporated perhaps: "We need to move from policy to action. Active management on the ground needs to become the norm."
Survey Monkey	Do you have any feedback on Obj 6? Yes, A scheme that will pay for land been taken out of Production
Survey Monkey	Educate volunteers to monitor protected areas and a clear reporting process..biodiversity enforcement officers with the same power as planning enforcement. No development allowed that has a damaging effect on protected areas.
Survey Monkey	Farmers and the deliberate killing of birds of prey shouldhave been takled before now. How do you propose to takle this issue.
Survey Monkey	I do not agree more progress is needed on this objective to ensure protection and effective conservation of these areas.
N/A	gouvernement departments. There is wholesale granting of aquaculture licences for oyster farms around the coasts of Ireland without proper regard for the biodiversity, ecosytems, natural habitats, wildlife & environment. Licenses for oyster farms are being granted without public consultation. The Minister is giving approval without visiting the sites -

Page	Comment
60	<p>In relation to action 6.1.5, the new Locally Led Agri-Environment Schemes (LLAES) could be instrumental in enhancing habitat condition on upland Natura 2000 sites as these sites face specific challenges associated with topography, weather, limited productivity and consequent land abandonment. These challenges are not addressed through GLAS. Most Natura 2000 sites are privately-owned and to date the farmer's experience and perception of designation has typically been one of restriction and burden. The innovative Burren Farming Programme, where farmers are involved in preparing their own farm plans and where part of their payment is based on the environmental condition of their farm, provides a model showing how biodiversity can become something which farmers are proud of.</p>
Survey Monkey	Increase human resource capacity within NPWS (national and regional specialist staff) and at local government level (Biodiversity Officers) to ensure enhance effective delivery in partnership with key stakeholders
Survey Monkey	Increase the number of protected areas to enhance biodiversity.
58	OBJ 6 3rd Paragraph NEW TEXT: NEW TEXT: Habitat categories of particular concern are grasslands, limestone pavements, heaths, peatlands, forest, certain types of lakes, and reefs, ... The main threats and pressures on habitats are: agriculture. Comment: Ireland has 10x more limestone pavement in terms of areal extent than the UK; limestone pavement is a priority habitat in the Habitats Directive.
58	Objective 6: Expand and improve management of protected areas and legally protected species pNHAs and NHAs are referred to in this Objective but don't appear to have any targets or action points associated with them. As National designations these should be included.
Survey Monkey	Please refer to supplementary information.

Page	Comment
Survey Monkey	public engagement? Noting the work of other organisations who interact the general public every day, such as the ten BIAZA (zoos and aquariums) collections in Ireland. It should also be noted that these extend through the island of Ireland.
Survey Monkey	Right now Galway city and county council want to build on areas of special interest, protected scenic views, blanket bog, underground springs...if money and action could be made available to protect these, now is the time! this is part of the 'N6 galway outer bypass'..near cappagh road, castlegar area and separately the rezoning of merlin meadow for development. Please help to save these beautiful, amazing areas if you can!
58	Target 6.1 See comment no 1 above in relation to Targets 4.1 and 6.1
59	Target 6.1 This target includes the EU designated sites. However, completing the NHA designation is not included in this list of actions. It is strongly recommended that a prioritised list of 25 pNHA's be prepared together with interested stakeholders and that the designation of these priority pNHAs is completed.



Page	Comment
59	<p data-bbox="210 181 472 207">Target 6.1.3 CONTEXT</p> <p data-bbox="210 220 1267 405">None of the SPAs designated for Raptors have site specific Conservation Objectives. According to Article 4(4) of the Birds Directive, all sites submitted to the Commission must have established priorities (in light of the importance of the sites) for the maintenance or restoration of those sites at a favourable conservation condition within six years (Conservation Objectives).</p> <p data-bbox="210 418 1267 520">The lack of any site level objectives for Raptor SPAs ultimately means the Irish Government is not achieving the requirements as set out in Articles 2, 4.1, 4.2 and 4.4 of the Directive in relation to its protection of Raptors.</p> <p data-bbox="210 533 1267 906">Conservation Objectives for Raptor SPAs have not been progressed by NPWS and there currently exists no reference for: identifying site-related conservation measures, or, for carrying out appropriate assessments of the implications of plans and projects for a site (in compliance with Article 6(3) and 6(4) of Habitats Directive). Article 7 of Habitats Directive, which applies to Special Protection Areas (SPAs) designated under the Birds Directive, makes clear that the provisions of Article 6.3 apply to the SPAs. Priorities for site-related conservation measures must be defined in the light of the threats of degradation or destruction to which those sites are exposed. It is expected these correspond to the threats and pressures identified by NPWS in the Article 12 reporting submitted to the European Commission.</p> <p data-bbox="210 919 1267 1145">The European Commission Guidance Note (2012) on Setting Conservation Objectives for Natura 2000 Sites states that Conservation Objectives at the site level must have full regard to the details in the Natura 2000 Standard Data Forms and that these form the starting point for the setting of site level targets for the maintenance and enhancement of listed species. Conservation Objectives for the Raptor SPAs need to be clear and straightforward and should be quantifiable in numbers and/or size.</p> <p data-bbox="210 1158 1267 1257">IRSG expect that site level targets should be the number of Raptors present in SPAs at time of designation as per Natura 2000 Standard Data Forms submitted to the Commission.</p> <p data-bbox="210 1270 472 1295">5.5.2. IRSG RESPONSE</p>

Page	Comment
61	Target 6.2 It is very concerning that there is no mention of progressing the designation and conservation of the NHA network in this target or in the plan at all. Biodiversity conservation targets cannot be met by focussing solely on the Natura 2000 network

Page	Comment
61	<p>Target 6.2: Sufficiency, coherence, connectivity and resilience of the protected areas network substantially enhanced by 2020</p> <p>Ireland's Natural Heritage Area (NHA) network is the basic designation for wildlife. Along with our national parks and the Natura 2000 network they form the foundation of our network of protected sites. The protection they provide is critical to prevent the biodiversity loss. In addition, they provide connectivity between other protected sites and help to reduce the negative impacts of fragmentation and are important in providing resilience against pressures such as climate change. On a basic level these sites have been protected under national legislation, the Wildlife (Amended) Act 2000, because they are considered important for the conservation of habitats and species which need protection and are of national importance.</p> <p>Given the pivotal role that Ireland's NHAs and proposed National Heritage Areas (pNHA) play in the conservation of biodiversity An Taisce would have expected them to feature strongly in the NBAP. Incomprehensibly, this is not the case.</p> <p>The July draft of the NBAP contained action "6.15.1 By 2018, review policy regarding designation of Natural Heritage Areas," with a performance indicator of "Review completed" and a Baseline of "Policy in regard to pNHAs is currently under review."</p> <p>This was the sole action within the NBAP which related to NHAs and it has been removed from the current draft. An Taisce finds it incomprehensible that one of the most important tools for biodiversity conservation has been completely deleted from the agenda. Based on the text and the Irish state's record of conserving the NHA network, it is not entirely clear whether a review of the pNHAs would benefit biodiversity, at least not the kind of review that could be implied.</p> <p>Only 148 peatland NHAs out of the 800+ NHAs identified in the 1990s have been statutorily designated and given legal protection. This is unacceptable. At the moment we have a situation in this country where the only sites that are protected are either estates that were gifted to the Irish people and made National Parks or SACs and SPAs which are the result of European Directives. The NHAs that have protection have only been designated as the result of legal action by the European Commission.</p> <p>Under the previous NBAP it was identified under target 16 that "Although some NHAs have been designated, a systematic programme for NHA designation has not been undertaken and some 600</p>

Page	Comment
62	<p>Target 6.3: No protected habitats or species in worsening conservation status by 2020; majority of habitats and species in, or moving towards, favourable conservation status by 2027</p> <p>Regulation 39 of the European Commission (Birds &amp; Natural Habitats) Regulations 2011 (SI No. 477), provides a mechanism to fulfil the objectives of the Habitats Directive or the Birds Directive, to protect designated habitats and species through the development on an appropriate threat response plan to “cease, avoid, reverse, reduce, eliminate or prevent the threat, pressure, hazard, combination of threats, pressures or hazards, adverse effect, pollution, deterioration or disturbance.”</p> <p>The July draft of the NBAP had identified the implementation of threat response plans as a fundamental tool to achieve the objectives of Target 6.3 over the duration of the NBAP. It contained Action “6.16.1 Implement species’ threat response plans where necessary and review and update as required,” which has been removed from the current draft. An Taisce believes that Article 39 of the Bird and Natural Habitats Regulations is a critical tool to bring about a rapid response to imperative conservation issues. Given the scale of biodiversity loss over the last two decades and the poor conservation status of many of Ireland’s designated habitats and species, it is obvious that the threat response plan will be more necessary than ever, over the course of the next four years. An Taisce call on the NPWS to reinstate this an action on threat response plans and extend its scope to include habitats, i.e., implement species and habitat threat response plans where necessary and review an update as required.</p>

Page	Comment
Survey Monkey	Targets 6.2.1 and 6.3.1 relate to an absolutely crucial issue that goes through all decisions from small planning decisions to forestry grants etc. Species involved include marsh fritillary and lesser horseshoe bat in particular. Action 6.3.1 highlights that there will be guidance on species / habitat protection (Annex spp / habs) and connectivity between protected areas. However, any guidance needs to be underpinned with facilitating information and policy. For example, most LAs have generic policies on connectivity linked to the Habitats Directive (waterways, hedges, ponds etc), and some such as Monaghan have made it a priority to apply them. However, it is areas such as marsh fritillary habitats and lesser horseshoe bat corridors that are disappearing. The approach must be to have a targeted approach where features are noted as important (eg within County BAPs) and their strategic importance is understood (eg full connectivity for bats and minimum distances to other areas of suitable habitat for marsh fritillaries etc). This is an area where, if it isn't done properly, it will not be implementable and is of concern as so much habitat loss falls outside the planning process, a 'change of use consent' process is likely to be required to deal with this issue properly.
Survey Monkey	The BSBI fully supports this objective.

Page	Comment
58	<p>The conclusion of the 'Fitness check' of the Nature Directives was that achieving the objectives of the Directives will depend on substantial improvement in their implementation . One of the challenges to implementation in Ireland is the ongoing poor quality of appropriate assessments thus the level to which they are effective ensuring that there is no adverse impact on the integrity of the site concerned is very low.</p> <p>Implementation of this aspect of the Directives has been particularly problematic in Ireland, where European Court of Justice has found against Ireland systemic failures of licencing authorities to carry out appropriate assessment in accordance with the directives. In recent years, the persistence of authorities' failure to comply with the directives was highlighted in the granting of development consent for 2 related wind farms in Co. Roscommon without proper application of the requirement to ensure avoidance of impacts on protected species and habitats. An Bord Pleanála granted permission for the developments in August 2013, however a judicial review concluded in July 2014 found that the Board had not lawfully conducted an appropriate assessment and had failed to give adequate reasons for its determination that the wind farms would not adversely affect the integrity of Natura 2000 protected sites in the vicinity of the developments . It follows that an action is required in the next National Biodiversity Plan to improve Habitats Directive Article 6 Implementation. It is surprising that Objective 6 does not contain such an action in the Draft Plan. The examination should include the following types of development: roads, wind energy, industrial developments, housing, and agricultural developments such as land clearance and drainage.</p> <p>The provisions of Article 6(2) and 6(3) of the Habitats Directive apply not only to plans or projects inside a Natura 2000 site but also to those that are outside the site itself but could have a significant effect on the conservation of species and habitats within the site. For instance a development in an undesignated upper catchment of a river that could alter the water flows or affect water quality in the river which is designated for sensitive species must also be subject to an appropriate assessment. Thus the assessment of impacts of developments that occur outside protected sites which may have adverse impacts on species and habitats that are protected, must also be examined.</p> <p>I do hope that these observations and recommendations will be taken on board in the</p>

Page	Comment
59	<p>The development and publication of site-specific conservation objectives for Natura 2000 sites (action 6.1.3) is important and would seem to be an essential step towards the conservation and protection of these areas. Mountaineering Ireland would like to see this action extended to Natural Heritage Areas.</p> <p>The development of conservation measures and a conservation management plan for each site is also required. Mountaineering Ireland appreciates that NPWS may not currently have the resources to fulfil this task but it is difficult to envisage how effective management, and improvement in the status of designated sites, can be achieved without management plans, and the resources to implement them.</p> <p>This resource requirement should be clearly expressed in the Biodiversity Action Plan.</p>
Survey Monkey	<p>The impact on legally protected species of microbiota change is not known. There is research that plastic monomers and other components affect fish. It would seem likely that uncontrolled microbiota destruction will eventually be found to be environmentally damaging, and may be impossible to reverse, but this is not addressed in the plan at all</p>
Survey Monkey	<p>The need to provide guidelines for assessment of major projects including wind farms, solar parks, power lines and other projects is evident when comparing the situation with Northern Ireland and Great Britain. There is a requirement to clarify whether it is legally correct and sufficient to assess projects for the presence of Annex IV and Annex IV species as a condition of planning. This is still occurring with bats in projects in the Republic of Ireland. The management of legally protected species (in this instance bats) must define the correct mechanism for implementing the EU and Irish legislation as it applies to bats. Management of protected species extends beyond Natura 2000 sites and into buildings and other structures throughout the island.</p>

Page	Comment
	There may be room for a specific action on financially supporting landowners adjacent to Designated sites as they are the buffer to the site and may be the refuge for fauna during climate change. This would be payments for evidence based biodiversity enhancement sympathetic to the conservation goals of the designated sites. There should be a specific action for controlling IAS within and adjacent to Designated sites.
61	<p>Under Target 6.2: ‘Sufficiency, coherence, connectivity and resilience of the protected areas network substantially enhanced by 2020’ there should be an addition that ‘implementation of Article 6 of the Habitats Directive shall be strengthened through training, monitoring and provision of support to all stakeholders so that favourable conservation status is facilitated for all protected sites and species’.</p> <p>A specific action required here is to examine of the standard of implementation of Article 6 of the Habitats Directive. The examination should include the following types of development: roads, wind energy, industrial developments, housing, and agricultural developments such as land clearance and drainage. The provisions of Article 6(2) and 6(3) of the Habitats Directive apply not only to plans or projects inside a Natura 2000 site but also to those that are outside the site itself but could have a significant effect on the conservation of species and habitats within the site. For instance a development in an undesignated upper catchment of a river that could alter the water flows or affect water quality in the river which is designated for sensitive species must also be subject to an appropriate assessment. Thus the assessment of impacts of developments that occur outside protected sites which may have adverse impacts on species and habitats that are protected, must also be examined. <a href="#">2</a></p>
Survey Monkey	We appreciate the measures listed to improve the management of protected areas and legally protected species. However, we call for a scrapping of the section of the Wildlife Bill aiming to de-designate 46 bogs as Natural Heritage Areas. <sup>1</sup> It is recognised that the reason for de-designation of these particular bogs is that they currently are under significant turf cutting pressure. We see their de – designation as a politically motivated move, which shirks the government’s responsibility of ensuring the protection and preservation of all our vital wetlands as rare and important habitats and carbon sinks. <sup>2</sup>
Survey Monkey	We need more NHA's designated. And an easier system for handing property over to the state for nature conservation.



Page	Comment
59	With regard to action 6.1.4, text information seems to be missing from my print out.
Survey Monkey	Yes our national parks are severely under staffed, rural areas also need day to day rangers not working with inthe park but in areas of intensive agriculture or areas that expiernce heavy tourist traffic such as the Burren, in south Clare there is no sign of warden/ranger to deture dumping,illegal slurry spreading or poaching etc.

Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Objective 7	
Page	Comment
64	5th Paragraph: CITES is the Convention on International Trade, not Trade
65	<p>7.1.1. Biodiversity will be made a component of Ireland's development cooperation programme; and support to, and cooperation with, developing countries shall take into account biological diversity through the application of the CBD</p> <p>One of the most effective policies Ireland could adopt to protect global biodiversity, ecosystem services and developing countries, is to embrace the principle of climate justice. Ireland must decarbonise our society and set sectoral targets for emissions reductions which are compatible with out EU and International Agreements to tackle climate change.</p>
65	<p>7.2.1. International agreements (including CBD, CITES, CMS, OSPAR, ICES, GSPC, IPBES and NASCO) will be serviced to ensure that Ireland plays a role in the future of international biodiversity policy, particularly in the area of mainstreaming biodiversity and ecosystem services across all sectors</p> <p>Strongly agree</p>
66	<p>7.2.2. Continue to contribute data and information to European and international networks (including Global Biodiversity Information Facility, and European Environment Agency) to support conservation research and policy</p> <p>Wherever possible, data on the environment should be made publicly accessible, with caution taken in regard to rare species, for reasons elaborated above in point 2.1.5. An Taisce strongly support the presence of the Science and Biodiversity section of National Parks and Wildlife Service (NPWS) on twitter.</p> <p>DAH should establish apps and websites where NPWS data can be complemented by citizen science data. DAH should work with the NBDC and Educational institutes to develop projects which integrate citizen science. The EPA funded Reconnect project is an excellent example of this</p>

Page	Comment
66	<p>7.3.1. On-going communication and harmonized action on issues of common concern</p> <p>Cross border cooperation should continue to be strengthened. Wildlife does not recognise territorial borders. An all-Ireland approach to conservation should be pursued over the life time of this NBAP. An all-island approach to conservation would be in line with the aspirations set out by the Good Friday agreement. Close cooperation in order to preserve and enhance the wellbeing of our shared environment and natural heritage is in the interests of all of the people on the island of Ireland and the many species which we share our territories.</p> <p>Highly mobile species such as raptors and habitats and species which have important cross border populations should be targeted for close cross border cooperation. The Slieve Beagh SPA is one of six</p> <p>Hen Harrier SPAs in the country. It sits on the border of Monaghan with Northern Ireland. There are also a number of nationally important hen harrier populations which sit on the Donegal border with Northern Ireland. Despite this there has been cross border cooperation that An Taisce is aware of on the Hen Harrier Threat Response Plan. There should be an all-island approach to conserving genetic diversity and to species action plans where relevant. There should be cross border cooperation where designated sites are on the border. Where designated sites in the two jurisdictions have the same qualifying interests, there should be cross border coordination to harmonise conservation objectives and management plans.</p> <p>The All-Island Species Protection Plans need to be resurrected.</p> <p>There could also be better cross border cooperation in the implementation of the Marine Strategy Framework Directive.</p> <p>Invasive Species Ireland was a very positive all-island initiative. It is more relevant now than ever.</p> <p>There is no performance indicator for this action.</p> <p>There should be an action relating to cross border coordination on wildlife crime.</p>

Page	Comment
67	<p>7.3.2. Cooperation and coordination (where possible and relevant) on Species and Habitat surveillance initiatives under the Habitats and Birds Directives (e.g., All-Ireland seal surveys; AllIreland cetacean strandings scheme)</p> <p>The Bird Atlas 2007-2011 is an example of cross border cooperation and coordination.</p>
67	<p>7.3.3. Further cooperation on and co-ordination of All-Island Species Protection Plans</p> <p>As the baseline says there has been no update since 2011. The All-Island Species Protection Plans should be resurrected. At the very least there should be some recognition of the need for rangers to coordinate on cross border conservation of relevant SAC/SPA (e.g. Slieve Beagh).</p>
67	<p>7.4.1. Adopt measures to significantly reduce major impacts of trade on biodiversity and (in the case of negative impacts) and/or enhance these impacts (in the case of positive impacts)</p> <p>The proposed import of biomass from North America will involve deforestation on a massive scale. The DAH should oppose the trade in any products or raw materials which will drive biodiversity loss internationally.</p>
68	<p>7.4.2. Ensure CITES Regulations are effectively implemented and enforced</p> <p>CITES is a vital international trade agreement. It is important that the NPWS are properly resourced to ensure that Ireland is fulfilling its obligations under CITES.</p>

Page	Comment
68	<p>7.4.3. Implement legislation to control imports of illegally harvested timber into Ireland. Facilitate exchange of best practice in private and public sector procurement policies favouring wood products from sustainable sources, including certifiable wood products</p> <p>The European Union's established policies to fight illegal logging and associated trade back in 2003 with the Forest Law Enforcement Governance and Trade (FLEGT). Despite this and subsequent actions to tackle illegal logging, it is clear that in countries like Cameroon these policies have had little effect. Improving governance structures is not effective in countries where there is endemic corruption and fraud at the highest level. All of the primeval rainforest in Cameroon for example has been felled, with the majority of this wood going to the European Union. Ireland must take action to halt trade in wood products and raw lumber with countries where there is evidence of illegal logging and corruption. Ireland should push for stronger action to be taken against countries that are carrying out illegal logging.</p>
68	<p>7.4.4. Investigate potential measures to prevent, minimise and/or mitigate deforestation due to non-wood imports</p> <p>As the baseline comment says “The main imports driving deforestation are palm oil and Brazilian beef”, actions should be taken to ban not only uncertified palm oil but also by-products of palm oil production, such as palm kernel. According to the Irish Times, “Between 2000 and 2012, 16 million hectares of virgin Indonesian forest fell, owing in large part to palm-oil plantations. Once the plantation matures, oil is extracted from the fruit, and the kernel husks left behind are sold</p>
66	Action 7.2.1 Action : Add AEWA
65	Action 7.2.1 Baseline: Add and OSPAR
67	Action 7.2.2 NEW TEXT Performance Indicators: 1. Number of networks provided with data from Ireland. 2. Number of networks/ Institutions provided with data within the EU

Page	Comment
66	Action 7.2.2 Observation: the Data Centre can contribute to this action assuming a 'business as usual' scenario for delivery of the Data Centre's work programme 2018-22. Specifically this would require NPWS to continue to pay the annual membership contribution to GBIF, with the Data Centre covering operational costs from its core budget allocation.
66-67	Action 7.3.1 It is considered that a specific topic of North-South harmonised action should be development of an All-Ireland vegetation classification scheme.
Survey Monkey	Action 7.3.2 - should the Irish Whale and Dolphin Group be noted as a key partner here?
68	Action 7.3.2 Action: Add All-Ireland Red List for Birds (BoCCI); All-Ireland Brent Research Group)
68	Action 7.3.3 Comment Action in response to: All-Island Species Protection Plans
67	Action 7.3.3 No PI identified
67	Action 7.4.1 The EPA Green Procurement document is cited as a baseline for this Action. However this document mentions biodiversity only once and that is in relation to fish labelling. It is therefore not considered to be a reasonable baseline document in this respect.
67	Action 7.4.1: The EPA published a guidance document to assist the public sector to implement and maintain procedures for green public procurement <sup>41</sup>
67	Action 7.4.4 No PI identified

Page	Comment
email	<p>As above, IFLA Europe have an established dialogue with the EC through DG Environment and the Biodiversity Unit. The IFLA Europe award of 2016 was presented to EC in October 2016.</p> <p><a href="http://iflaeurope.eu/european-commission-receives-ifla-europe-award-2016/">http://iflaeurope.eu/european-commission-receives-ifla-europe-award-2016/</a></p> <p>ILI as a member of IFLA Europe would be willing to assist in a continuing and focused dialogue to ensure these and related principles are included in the DNBSAP and subsequent implementation. There are a number of projects which can assist in achieving the objectives and actions of the DNBSAP.</p> <p>Including EKLIPSE</p> <p><a href="http://www.eklipse-mechanism.eu/documents/15003/0/EKLIPSE_CALL_FOR_EXPERTISE_1-2016_NBS_web.pdf/378ce121-c604-47b3-813e-2bae533712bc">http://www.eklipse-mechanism.eu/documents/15003/0/EKLIPSE_CALL_FOR_EXPERTISE_1-2016_NBS_web.pdf/378ce121-c604-47b3-813e-2bae533712bc</a></p> <p>IFLA Europe and by extension ILI are part of this project focusing on the design and implementation of Nature Based Solutions (NBS) for many projects including such topical issues as flood management and flood alleviation design.</p> <p>Linkages to other projects on a regional and global stage can also be organised by ILI/IFLA Europe. The project Indigenous Ecological Corridors and Nodes (IEC+N) is a global project between IFLA and UIA which seeks to ensure a multidisciplinary approach to ensuring green infrastructure and principles fostering biodiversity are included in rural and town planning.</p> <p><a href="http://iflaonline.org/2016/11/indigenous-ecosystem-corridors-and-nodes-a-joint-project-of-the-uia-and-the-ifla/">http://iflaonline.org/2016/11/indigenous-ecosystem-corridors-and-nodes-a-joint-project-of-the-uia-and-the-ifla/</a></p> <p><a href="http://iflaonline.org/wp-content/uploads/2016/11/IFLA-News-Issue-10.pdf">http://iflaonline.org/wp-content/uploads/2016/11/IFLA-News-Issue-10.pdf</a>- Notes 1. NPWS to ensure a continuing dialogue with ILI.</p>
	<p>As identified under Objective 7 biodiversity does not recognise political boundaries and Ireland and Northern Ireland share the same biogeographic space with many species moving between the two territories. As a North South Body Waterways Ireland has used its status to open and create dialogue on a cross border basis, in particular with regard to Invasive Alien Species. Our Heritage Plan is also cognisant of biodiversity measures, policies and regulations on an all Island basis and we believe successfully married these policies into one cohesive document with regard to the protection and promotion of the inland waterways resource.</p>

Page	Comment
Survey Monkey	<p>As with our comment on Objective 1, IFLA Europe has an established dialogue with the EC through DG Environment and the Biodiversity Unit. The IFLA Europe award of 2016 was presented to EC in October 2016. <a href="http://iflaeurope.eu/european-commission-receives-iflaeurope-award-2016/">http://iflaeurope.eu/european-commission-receives-iflaeurope-award-2016/</a> There are a number of projects which can assist in achieving the Objectives and Actions of the DRAFT NBAP. A significant project of relevance to the Draft NBAP is EKLIPSE:- <a href="http://www.eclipsemechanism.eu/documents/15003/0/EKLIPSE_CALL_F_OR_EXPERTISE_1-2016_NBS_web.pdf/378ce121-c604-47b3-813e-2bae533712bc">www.eclipsemechanism.eu/documents/15003/0/EKLIPSE_CALL_F_OR_EXPERTISE_1-2016_NBS_web.pdf/378ce121-c604-47b3-813e-2bae533712bc</a> IFLA Europe and by extension ILI are part of this project focusing on the design and implementation of Nature Based Solutions (NBS) for many projects including such critical and topical issues as Flood Management and Flood Alleviation Design. Linkages to other projects on a regional and global stage can also be organised by ILI/IFLA Europe. The project Indigenous Ecological Corridors and Nodes (IEC+N) is a global project between IFLA and UIA which seeks to ensure a multidisciplinary approach to ensuring Green Infrastructure and principles fostering Biodiversity are included in rural and town planning. <a href="http://iflaonline.org/2016/11/indigenous-ecosystemcorridors-and-nodes-a-joint-project-of-the-uia-and-theifla/">http://iflaonline.org/2016/11/indigenous-ecosystemcorridors-and-nodes-a-joint-project-of-the-uia-and-theifla/</a> <a href="http://iflaonline.org/wpcontent/uploads/2016/11/IFLA-News-Issue-10.pdf">http://iflaonline.org/wpcontent/uploads/2016/11/IFLA-News-Issue-10.pdf</a></p>
Survey Monkey	Do you have any feedback on Obj 7? Encourage Bee keeping in each Parish.
Survey Monkey	<p>Government ministers should be transparent in their dealings - why for eg, did Simon Coveney change the bill regarding Aquaculture licenes - because there was a backlog! Of course there was a backlog, the international oyster farming businesses couldn't believe how cheap and easy it was to come in here and destroy our beaches - make a quick buck in a few years &amp; leave all the mess &amp; destruction. It was lobbying from them to buy up our strands and beaches - and government bowed down &amp; ignored all the environmental protections that should be there, and everything else. International governance is there - but Ireland obviously have ways of ignoring it.</p>
Survey Monkey	I support this objective
Survey Monkey	International governance isn't the problem, i'm afraid it's national governance that needs strengthening.



Page	Comment
Survey Monkey	Ireland should have a policy of protecting international biodiversity and ecosystems and should limit the importation of any goods that are manufactured that damaging under international law. We should be able to rate all items online for their carbon footprint and effect on biodiversity.
Survey Monkey	It would be great for local groups to have more support internationally as they are being ignored by small minded councils locally. Financially, legally and promotional.
64	Objective 7 Last Paragraph Suggest that this needs to acknowledge possible Brexit implications.
Survey Monkey	Once again our own government are serious culprits when it comes to the lose of ecosystems in our own country, I should hazard a guess that most Irish polititions can't name more then one or two species of tree let alone or know how many species of bat we have on this island
Survey Monkey	Please refer to supplementary information.
64	Ramsar websites etc use 'Ramsar', ie not all in capitals as shown in NBAP – RAMSAR.
64	Regarding the introductory text of Objective 7, reference should be made to Ireland's implementation of the Lima Action Plan through its Biosphere network, as this contributes to the implementation of the Sustainable Development Goals.
67	Target 7.4 Include an Action to raise awareness amongst the public re issues such as palm oil and Brazilian beef.

Page	Comment
67	<p>Target 7.4: Substantial reduction in the impact of Irish trade on global biodiversity and ecosystem services</p> <p>Aside from implementing EU trade and environmental laws what do the Irish authorities do to verify the sustainability of imported tropical products?</p> <p>Ireland should move to place a ban, by 2021, on all products and raw materials, which are sourced from the tropics which do not have sustainability certification. The Irish authorities should work with our EU partners and NGOs on the ground to verify the sustainability credentials of certification and take joint action against countries that are in breach of International conventions such as CITES.</p> <p>Despite the 1986 IWC ban on commercial whaling, Iceland, Norway and Japan refuse to end their whaling operations. The DAH should encourage the Irish authorities to open a dialogue with countries who continue to carry out commercial whaling. In the case of Iceland and Norway many targeted species are migratory and also pass through Irish waters. Our cetaceans are part of our shared heritage. Illegal whaling is an attack on Irish and EU biodiversity and the moral consensus of the international community which led to the ban on whaling.</p>

Page	Comment
	<p>The Association would highlight that, in their view, the failure to achieve favourable status for many habitats and species in the Republic of Ireland (e.g. p. 7 of draft Plan; 91% of EU Habitats assessed as unfavourable status) is mirrored, if not exceeded in Northern Ireland.</p> <p>There has been severe historic underinvestment in environmental protection in Northern Ireland over many decades. One Northern Irish member of the Association proposes that the Republic could play a leadership role on the island, for instance continuing the valuable existing joint funding initiatives in research and invasive species control.</p> <p>The Association would highlight ash Fraxinus excelsior dieback, and the failure to significantly increase deciduous woodland area as a worthy project for cross-jurisdictional collaboration in research that is not a target of the draft Plan. Furthermore, we note ash dieback is not mentioned in the plan. The Ash dieback baseline and an appropriate target should be specified under Target 4.4.1.</p>
Survey Monkey	The BSBI fully supports this objective.
Survey Monkey	There is a need for a comprehensive support system for determining the provenance of plants and animals entering the Republic of Ireland. At present, it is very difficult to determine a means by which by potential breaches of CITES can be confirmed. Even where a protected species is entering from another EU country, there should be some means of licensing of the organism (bats in this instance) to confirm the origin and legality of possession of the organism by a third party (non-governmental)
Survey Monkey	There is too much governance from Europe at the present.

Page	Comment
66	<p>Under target 7.3 (enhanced cooperation with Northern Ireland on common issues) it is recommended that an action be included to organise an annual all-Ireland Biodiversity conference for Biodiversity Officers, Heritage Officers and other interested parties, similar to the annual Biodiversity Conference that is organised for Welsh Biodiversity Officers by the Welsh Biodiversity Partnership.</p> <p>We would be very happy to meet with the author(s) of the draft biodiversity plan to clarify and discuss any of the above comments. Should you have any queries regarding the above suggestions and recommendations, please do not hesitate to contact us.</p>
Survey Monkey	<p>We have very poor implementation of CITES. When we encountered an exotic bat being sold in a fish tank in a pet shop in Dublin last year, we were told that it couldn't be identified and there was nothing NPWS could do. At a basic level we need species identification - dna analysis may be required. Then we need licences for the keeping of exotic animals and a breeding record. It is astonishing that we microchip our dogs but have nosystem for recording the provenance of exotic species</p>
Survey Monkey	<p>We welcome the comments regarding all island cooperation in this document. Nature does not recognise borders, therefore it is vital that we have co-ordinate nature conservation strategies and policies for the whole island of Ireland. The Green Party calls for the establishment of an all island structure for environmental protection and enforcement. There is the likelihood that there will be differing environmental legislation and standards in operation on both sides of the border soon. Thus, there is a strong onus on the Irish government to engage closely with their UK counterparts to ensure that strong environmental standards remain in place, as well as the potential for creating all Ireland monitoring and enforcement bodies. As an example of the importance this, Green Party Councillor Mark Dearey has raised concerns about the protection of Carlingford Lough and the importance of maintaining drinking water standards in Dundalk, Co. Louth. Dundalk gets its drinking water from the River Fane, which rises in Co. Monaghan, crosses into Co. Armagh, before flowing into Dundalk.<sup>1</sup></p>
67	<p>With respect to action 7.4.1, it needs to be made clearer what this means. Does this refer to CITES, Consumerism trends, Carbon sequestration, Waste disposal. Is there a role to refer to IAS within this action and ISPM no 15. The action needs to be fleshed out more.</p>

Page	Comment
68	With respect to action 7.4.4, BnM and other Biomass consumers should also be mentioned as Actors or key partners. BnM are importers of palm kernels to supply their power plants. There may be other industries to consider also for inclusion for preventing global deforestation eg sugar industry, coffee/tea industry, mining industry and maize and stock feed industries.

Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Page	Comment
	NEW TEXT 76. Wyse Jackson, M., FitzPatrick, Ú., Cole, E., Jebb, M., McFerran, D. & Wright, M. (2016) Ireland Red List No. 10: Vascular Plants. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Dublin, Ireland.
69	Ref 20: Replace “Peter Wyse-Jackson” with “Wyse Jackson P”.
69	Ref 23: Replace “O Connnor A” with “O Connor Á”.
70	Ref 53: Replace “&” with “&”?
71	Ref 56: Replace “Curtis TGF, McGough HN, Ireland S” with “Curtis TGF, McGough HN”
71 or 72	Add References somewhere here to charophyte Red Data Book ((Stewart & Church 1992 – see above) and to Wyse Jackson <i>et al.</i> (2016) – vascular plant Red List.
72	Ref 99: Replace “Sorcha Pollak” with “Pollak S”?
73	Replace “CeDAR” with “CEDaR”.
74	Format (indent) second line of INFOMAR and OSPAR.
76	Replace “Nation” with “National”?
76	Add IBEC to list of abbreviations on p. 73
76	DHPCLG. Why not in full as with others on the list?
76	Should DAH be added to this?!
77	Ensure correct names of organisations (e.g. Ken Bradley’s?) and update all on the forum and working group e.g. DAHG to DAHRRGA etc
77	delete Emeritus Professor from Paul Giller? Noone else has their titles
77	Replace “Orla Casey, Ibec” with “Orla Casey, IBEC”.

Department of Health (2013). A framework for improved health and wellbeing 2013 – 2025.

Available online at

<http://health.gov.ie/wpcontent/uploads/2014/03/HealthyIrelandBrochureWA2.pdf>.

Accessed January 2017.

☐ IRSG (2016). Position Statement on the Hen Harrier Threat Response Plan. Submission to the Chair of the Hen Harrier Threat Response Plan. Available online at

<http://www.slideshare.net/RyanWilsonParr/irsg-position-hhtrp-october-2016-67549181>

Accessed January 2017.

☐ Marnell, F., Kingston, N. & Looney, D. 2009. Ireland Red List No. 3: Terrestrial Mammals, National Parks and Wildlife Service, Department of the Environment, Heritage and Local Government, Dublin, Ireland.

☐ McDevitt, A. D., Montgomery, W. I., Tosh, D. G., Lusby, J., Reid, N., White, T. A., McDevitt, D., O'Halloran, J., Searle, J. B., Yearsley, J. M. (2014). Invading and expanding: range dynamics and ecological consequences of the greater white-toothed shrew (*Crocidura russula*) invasion in Ireland. *PloS one*, 9(6), e100403.

☐ Montgomery, W. I., Lundy, M. G., & Reid, N. (2012). 'Invasional meltdown': evidence for unexpected consequences and cumulative impacts of multispecies invasions. *Biological Invasions*, 14(6), 1111-1125.

☐ Wyse Jackson, M., FitzPatrick, Ú., Cole, E., Jebb, M., McFerran, D., Sheehy Skeffington, M. & Wright,

M. (2016) Ireland Red List No. 10: Vascular Plants. National Parks and Wildlife Service, Department of

Arts, Heritage, Regional, Rural and Gaeltacht Affairs, Dublin, Ireland

	<p>References that may be of use</p> <p>Matin, S., Sullivan, C.A., Ó hUallacháin, D., Meredith, D., Moran, J., Finn, J.A., Green, S., 2016. Predicted distribution of High Nature Value farmland in the Republic of Ireland. Journal of Maps, 1-4.</p> <p>Moran, J., Sullivan, C., 2017. Co-benefits for Water and Biodiversity from the Sustainable Management of High Nature Value Farmland. Environmental Protection Agency, Wexford.</p> <p>Sullivan, C., Finn, J., Green, S., Matin, S., O hUallachain, D., Meredith, D., Moran, J., 2015. The types of High Nature Value (HNV) in Ireland In: O hUallachain, D., Finn, J. (Eds.), Farmland Conservation with 2020 Vision. Teagasc Biodiversity Conference 2015. Teagasc, Killeslin Hotel, Portlaoise, Co. Laois.</p> <p>Walsh, A., Finn, J., Jebb, M., Waldren, S., Sullivan, C., 2015. The distribution of vascular plant species of conservation concern in Ireland, and their coincidence with designated areas. Journal for Nature Conservation 24, 56-62.</p>
69	<p>Please include CIEEM's EcIA guidelines (as referred to above in comments) and as referenced by EPA guidance etc. Correct citation is: "CIEEM (2016) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester"</p> <p><a href="http://www.cieem.net/data/files/Website_Downloads/Guidelines_for_Ecological_Impact_Assessment_2015.pdf">http://www.cieem.net/data/files/Website_Downloads/Guidelines_for_Ecological_Impact_Assessment_2015.pdf</a></p>
69	<p>Please include CIEEM's (IEEM 2010) marine and coastal EcIA guidelines. Correct citation is: "IEEM (2010) Guidelines for Ecological Impact Assessment In Britain and Ireland Marine and Coastal Institute of Ecology and Environmental Management, Winchester"</p> <p><a href="http://www.cieem.net/data/files/Resource_Library/Technical_Guidance_Series/EcIA_Guidelines/Final_EcIA_Marine_01_Dec_2010.pdf">http://www.cieem.net/data/files/Resource_Library/Technical_Guidance_Series/EcIA_Guidelines/Final_EcIA_Marine_01_Dec_2010.pdf</a></p>



Draft National Biodiversity Action Plan 2017 - 2021 Public Consultation Submissions	
Page	Comment
73	Remove DECLG and DEHLG- these department names are not currently being used
77	NEW TEXT: Wayne Trodd, Department of Housing Planning Community and Local Government Donal Cronin, Department of Housing Planning Community and Local Government
74	NEW TEXT INFC: Irish Forum on Natural Capital
76	NEW TEXT: Irish Forum on Natural Capital
77	NEW TEXT: Paul Harris, Bank of Ireland, Global Markets
73	Again CITES is the Convention on International Trade in Endangered Species of Wild Fauna and Flora
73	Appendix I CIEEM: Chartered Institute of Ecology and Environmental Management to be added to list of acronyms as it is mentioned under Action 2.1.13 but not included in the Appendix
76	Appendix II CIEEM should have been consulted prior to issuing this draft. Also, the absence of input from or related to Coillte, Ireland's largest landowner, is notable. Coillte should comment on this plan before finalisation and be included as a key actor where appropriate.
77	Appendix III As Ireland's leading body representing more than 250 professional ecological (biodiversity) professional practitioners in Ireland, CIEEM should be a member of the biodiversity forum