

An Chomhairle Oidhreachta The Heritage Council



SUBMISSION on IRELAND'S 2nd NATIONAL BIODIVERSITY PLAN 2008 –2012

FINAL

1. INTRODUCTION

In January 2008, the National Parks and Wildlife Service of the Department of the Environment, Heritage and Local Government announced the development of Ireland's second National Biodiversity Plan 2008-2012 (hereafter, the NBP or "the Plan"). Submissions were invited from experts and stakeholders, as well as the general public, and three consultation workshops were convened. The Heritage Council has been invited to prepare this submission on the new Plan.

In making this submission, the Heritage Council seeks to support Government in its international and national commitments concerning biodiversity and its protection, conservation and management. These include commitments under the Convention on Biological Diversity, the EU target to halt biodiversity loss by 2010, as well as several EU Directives and national legislation.

We all rely on biodiversity in our everyday lives- even if we are not aware of it. Biodiversity provides many services, such as the provision of food, fibre, fuel, fresh water; regulation of climate, water and air quality; pollination, nutrient cycling, soil formation, as well as many cultural, recreational and health services. Biodiversity, and the implementation of the National Biodiversity Plan, is integral to the well-being of all. The recent report by the Heritage Council *Valuing Heritage in Ireland* illustrates the growing recognition of this reliance, with 65% of those surveyed agreeing that protecting our natural heritage is vital for health protection.

The National Biodiversity Plan should play a major role, if not *the* major role, in Ireland's efforts to halt biodiversity loss. It should be, and be seen to be, a driver and catalyst for change and action for the protection and enhancement of our biodiversity, and add value to existing work and initiatives. With just two years until 2010 – the date by which all EU member States, including Ireland, have committed to halting the loss of biodiversity- it is clear Ireland still has much to do if it is to achieve this goal at all.

The actions we take over the lifetime of this Plan have the potential to make a significant contribution to this target, but only if a range of stakeholders actively participate, engage and make it happen. This includes politicians, government departments, State bodies, business, industry, non-governmental organisations, the farming, fisheries and forestry sectors and the individual – in fact, all sectors of society. The second National Biodiversity Plan should provide us with a clear way forward for the next five years, with clear targets for achievement and impact, and clear mechanisms for engagement and delivery.

The recommendations contained within this submission are based on, *inter alia*:

- ❖ the Heritage Council's Strategic Plan 2007-2011,
- ❖ COMHAR's recommendations on the implementation and review of the first National Biodiversity Plan,

- ❖ the priorities, needs and actions identified in the development of local biodiversity action plans,
- ❖ the draft review of the Heritage Council's Forest Policy, as well as
- ❖ discussions and recommendations of the COMHAR Biodiversity Forum, of which the Heritage Council is a member.

This submission should not be considered an exhaustive list of all actions that are necessary to halt biodiversity loss in Ireland. Recommendations for action are not included for all themes proposed by the Department of the Environment, Heritage and Local Government, nor for every type of habitat or species group.

In order to ensure this Plan is as relevant and timely as possible, the results of the National Parks and Wildlife Services assessment on the conservation status of habitats and species listed under the European Union's Habitat's Directive (hereafter referred to as the Article 17 report) should be one of the foundation stones. This report contains critical information on the status of habitats in Ireland, as well as the species listed under the Habitats Directive. It is the first time a report of its kind has been prepared and the results and information on threats to biodiversity contained within are of critical value in the development of the Plan. The dissemination to, and consideration of, the findings of this report by a range of stakeholders should facilitate the development of new and innovative actions that will stimulate the delivery of the Plan and the achievement of its targets.

The Heritage Council hopes there will be further opportunities for consultation and discussion on the emerging draft Plan, particularly following the dissemination of the Article 17 report. We hope that this includes opportunities to comment on the draft Plan itself, but also to engage in dialogue with other stakeholders, through a further round of facilitated workshops. Further active consultation will help to ensure the buy-in and support needed from all stakeholders to deliver the Plan over the coming years, and to achieve its targets.

The Heritage Council recommends that the consultation process for the development of the National Biodiversity Plan allow sufficient time for all stakeholders to consider the results of the Article 17 report; it should also involve additional opportunities for active and extensive stakeholder dialogue on the emerging Plan.

2. KEY OVER-ARCHING RECOMMENDATIONS

2.1 The National Biodiversity Plan 2008-2012 - an Opportunity

The Heritage Council views the National Biodiversity Plan as a critical opportunity to review the needs for biodiversity conservation across Ireland and to identify ways to add-value to the existing work programmes and statutory obligations of relevant stakeholders, from Government Departments, State Agencies, non-governmental stakeholders, natural resource users, industry etc. It is an opportunity to take a holistic view of biodiversity in Ireland and to identify new and innovative ways to contribute to its conservation and management. It is important for us to remember as the Plan is developed that there is much biodiversity of value and importance outside our current designated areas, and lists of protected species. Much is yet to be discovered about our biodiversity in this country, particularly in the marine environment. This Plan should enable us to take the broad view of biodiversity across the countryside and within our seas, including, but not exclusive to, those habitats and species that have protection under our laws.

The Heritage Council recommends that the National Biodiversity Plan 2008-2012 should take a broad view of biodiversity conservation needs and issues across the countryside and within our seas, including, but not exclusive to, those habitats and species that currently have protection under our laws.

2.2 Completion of the first NBP and the EU Biodiversity Action Plan

As noted in the first NBP, “*the revision process should take account of the successes and difficulties in implementing the actions set out in this Plan, the value of these measures in contributing to the conservation and sustainable use of biodiversity and the changing status of biodiversity*”. The Biodiversity Forum of COMHAR was requested to undertake an independent assessment of progress in implementing the National Biodiversity Plan and their conclusions were published in 2005. The Department also conducted an interim review of the implementation and concluded that, at that time:

- ❖ 23 actions had been implemented
- ❖ 60 were being implemented on an ongoing basis
- ❖ 8 required further action.

A first step for the development of the second Plan will be to assess, both qualitatively and quantitatively, which of the original 91 actions require implementation on an ongoing basis or further action. In addition, the EU has developed a Biodiversity Action Plan for 2010 and Beyond- due consideration should be given to this in the development of the Irish National Biodiversity Plan, particularly the commitment to ensure “*biodiversity loss of most important habitats and species halted by 2010, these habitats and species showing substantial recovery by 2013*”.

The Heritage Council recommends that an assessment of the delivery of the first National Biodiversity Plan be undertaken, in order to inform the development of the second Plan.

The Heritage Council recommends that due consideration be given to the EU Action Plan for 2010 and Beyond, and the 2013 targets, in the development of the National Biodiversity Plan 2008-2012.

2.3 Development of a Vision for Biodiversity in Ireland

For a plan of action, such as the NBP, to be meaningful and focused, it should state clearly what its end-goal is. The development of a long-term vision for the state of Irish biodiversity would help focus stakeholders on a common and shared end-goal, and help mobilise support and action to implement the Plan. This would also help set the second Plan in a long-term context, which is particularly important given the timescale in which impacts on, and recovery of, biodiversity operate.

The Heritage Council recommends the development of a vision during the consultation period for the second National Biodiversity Plan. This should relate to the conservation of biodiversity (habitats and species) across the country, and not solely designated areas and protected species.

In addition to this, the undertaking of a Biodiversity Foresight Study for Ireland could present a longer-term perspective for biodiversity in Ireland to 2025; identify key long-term objectives for the conservation of biodiversity and present a strategic framework of measures necessary to meet the needs for the conservation of biodiversity in modern Ireland. This approach has been used widely in Europe, and in the agricultural sector in Ireland. Such a study could provide a long-term strategic approach to biodiversity conservation in Ireland, and is included the Heritage Council's Strategic Plan 2007-2011.

The Heritage Council recommends the undertaking of a Biodiversity Foresight Study for Ireland.

2.4 Identification of Clear and Measurable Targets

Ireland's over-arching target concerning biodiversity is its commitment to halt biodiversity loss by 2010. As the lifetime of this Plan goes beyond that target date, the Heritage Council recommends that additional specific targets be developed for each theme of the Plan. These targets should support the Plan's overall Vision, if it is agreed that one should be developed.

While the first National Biodiversity Plan had an overall goal, four objectives and four underpinning principles, there was no mechanism established for measuring the success or impact of the plan, beyond reporting of progress on specific actions. This makes it difficult to assess the real value of the Plan. If targets are to be developed for the 2nd NBP, these should be qualitative and quantitative, easily measurable and time-bound. Such targets could relate to, for example, the improvement in status of habitats or species listed under the Habitats and Birds Directives, or to increased unprompted recognition amongst the public of the word "biodiversity" and the impacts of biodiversity loss in Ireland.

The Heritage Council recommends that clear targets should be set for the second Plan: these should be qualitative as well as quantitative, easily measurable and time-bound so that the success of the Plan can be evaluated over its lifetime.

2.5 Delivery and implementation mechanisms

The Plan should clearly identify lead partners or delivery groups responsible for the delivery of each action. While the Department of the Environment and the National Parks and Wildlife Service are the lead agencies responsible for the development of the Plan, the integration of

the Plan into the work programmes of other departments and stakeholders will be necessary to ensure its completion, and the achievement of the Plan's vision and targets. Through the identification of lead partners and/or delivery groups, the potential for the success of the Plan will be much clearer.

The Heritage Council recommends that specific mechanisms for delivery of each action, with lead partners or delivery groups, should be identified through the consultation process on the Plan.

2.6 Identification and Allocation of Resources

It is crucial for the success of any Plan of Action, such as the National Biodiversity Plan, that sources for funding are identified for its implementation, in parallel with its development. The Plan should not be squeezed into the "available" resources but rather help leverage new and additional resources, as well as any opportunities for re-allocation of resources from elsewhere.

In 2007, the Heritage Council published the "Valuing Heritage in Ireland" report. This studied the value that people in Ireland place on heritage, and showed that the public are becoming increasingly concerned about the need to safeguard our heritage. The vast majority of those surveyed agreed that new measures and increased funding should be put in place as they are becoming increasingly concerned about the effect of development on our national heritage. In this survey it was made clear that the definition of heritage included natural heritage – though it is important to note that the term "biodiversity" itself was not used, which may explain why these results differ somewhat from the results of the Eurobarometer Biodiversity Awareness Survey referred to later in this submission.

The report shows a strong growth in people's attitudes and concern about safeguarding and protecting our heritage with over 92% of those surveyed agreeing that it is important to protect our heritage while 92% think that people should be penalised for damaging heritage (up from 51% in 1999). Ninety per cent are proud of our heritage (up from 83% in 1999) and 85% agree that the Government should offer more incentives to protect heritage (up from 76% in 1999).

Personal health is a key motivation for people's desire to enhance the protection of heritage and the environment. However, this motivation is combined with a social awareness of significant threats to the environment and a concern for future generations. The top reasons people have as to why heritage should be protected include:

Personal health – 68% of people agree that protecting our natural heritage for walks, enjoyment and recreation is vital for health protection

Threats to the environment – 65% of people agree that safeguarding water quality and biodiversity is vital for our environment

Concern for future generations – 52%

General interest in Ireland's wildlife – 40%

The study found a general acceptance that heritage protection is everyone's responsibility and that public taxation should be a key source of funding its protection. Additional public spending on heritage protection was supported by 68% of respondents to the survey. People's willingness to pay for this additional protection averages an extra €47 per taxpayer per annum, a figure that amounts to a total of €90 million in additional funding.

The data generated for the report highlights the public's support for increased spending to protect our natural heritage. As the second Plan is developed, the means by which these resources can be mobilised for its delivery should be considered and identified in tandem – this should help to ensure its effective delivery within its timeframe.

The Heritage Council recommends that the resource needs for the implementation of the Plan should be identified as the Plan develops, throughout the consultation period.

3. RECOMMENDATIONS FOR KEY THEMES IN THE NATIONAL BIODIVERSITY PLAN, 2008-2012.

3.1 Proposed structure of the NBP 2008-2012

The Department of the Environment, Heritage and Local Government has proposed that sixteen themes will be addressed in the second NBP. These are as follows:

- ❖ Protected Areas (including National Parks and Natura 2000 sites)
- ❖ Agriculture
- ❖ Forestry
- ❖ Marine and Coastal
- ❖ Inland Waterways
- ❖ Wetlands
- ❖ Communication, Education and Public Awareness
- ❖ Business and Biodiversity
- ❖ Climate Change
- ❖ Global Strategy for Plant Conservation
- ❖ Species Conservation
- ❖ Invasive Alien Species
- ❖ Bio-safety
- ❖ Genetic Resources
- ❖ Local Biodiversity Action Plans
- ❖ Conservation of Biodiversity Overseas (including trade and development policies).

There are many different ways in which a Plan such as this can be structured, once the overall vision, goals or targets are established. However, upon consideration of the proposed themes above, it is important to note that many of the habitats found within Ireland are not referred to. For instance, there is no reference to grasslands, hedgerows, or limestone pavement, to name just a few- and these clearly need continued action for their conservation. It is also unclear if, for example, the theme of Agriculture is to include actions for all agricultural habitats, or solely actions targeted at the agricultural sector. Likewise for forestry: there is no reference to woodland and scrub habitats in the proposed themes, but a “forestry” theme would not incorporate all of these habitats.

As only some sectors that have an impact on biodiversity are proposed to be the subject of specific themes i.e. agriculture and forestry, it is assumed that all other types of industry (e.g. mining and aggregates) will be addressed under the “Business and Biodiversity” theme, but this should also be clarified in the Plan. It is also notable that fisheries are not proposed as a specific theme, though this could be incorporated under “Marine and Coastal” and “Inland Waterways”, or included as a separate theme.

The Heritage Council recommends that the Plan include themes that address all types of habitats (e.g. woodlands and scrub, grasslands, wetlands, marine etc) found in Ireland, not solely those referred to above.

3.2 Additional themes proposed for inclusion

In addition to suggesting that the Plan include a wider range of habitat-specific themes, the Heritage Council would like to recommend that it also include a range of other themes and issues that affect our biodiversity. These are outlined here:

BASELINES AND MONITORING

A sound understanding of our biodiversity – what it is, where it occurs, and what is affecting it - is necessary to underpin the NBP, as well as the National Development Plan, the National Spatial Strategy, the Sustainable Development Strategy, the Rural Development Plan, the National Heritage Plan, the Water Framework Directive, the Habitats Directive and the Birds Directive, *inter alia*. The National Parks and Wildlife Service is moving ahead with a programme of research that will greatly increase this understanding and help inform decision-making. In addition, other bodies are also undertaking research and survey work that will contribute. The inclusion of a separate theme in the NBP for **Baselines and Monitoring** would help give this work a cohesive framework and outline priorities for establishing such baselines and monitoring systems and aid the engagement of other bodies. This could also elaborate on the further development of the National Biodiversity Research Platform and the contribution of the National Biodiversity Data Centre.

*The Heritage Council recommends the inclusion of a theme on **Baselines and Monitoring**.*

National Biodiversity Data Centre:

The Programme for Government (June 2007) committed to “*Resource the ... Centre as a central database to record the richness of Ireland’s flora and fauna and as a centre of research excellence.*” The Centre is currently in the process of developing a research agenda to fulfil this role, and this should be of central importance to this theme under the National Biodiversity Plan. The work of the Centre focuses on the following elements:

- ❖ National species and habitat databases;
- ❖ National baselines;
- ❖ A Programme for “Red-Listing” of threatened species;
- ❖ Indicator species for habitat quality;
- ❖ Strategic initiatives to ensure that adequate biodiversity data exists to inform decision-making.

In addition to the above, the Centre could provide a secretariat for the National Platform for Biodiversity Research.

*The Heritage Council recommends that the role and contribution of the National Biodiversity Data Centre should be clearly articulated in the Plan; this could form an integral part of a **Baselines and Monitoring** Theme.*

National Initiatives/Surveys:

There are two national actions or initiatives that could be undertaken to better enable us to prioritise conservation initiatives, as well as informing strategic planning and decision-making, particularly at the Local Authority level. These are:

1. A National Habitat Survey- to produce a comprehensive national database on the extent and distribution of Irish habitats.
2. A Countryside Survey – to sample a random selection of plots around the country in order to track vegetation and habitat changes over time. Changes identified will help assess the effectiveness of policy on the ground, and also identify potential changes due to climate change.

Other national surveys that have been identified as important (both by NPWS, but also by Local Authorities in the development of their local biodiversity action plans) are:

- grassland surveys
- ponds.

The Heritage Council recommends the establishment of a National Habitat Survey and a Countryside Survey, to inform decision-making and policy. Other recommended national surveys include ponds and grasslands.

In addition, there are a number of under-studied and unlisted taxa, particularly in the marine environment (e.g. sharks), for which conservation assessments should be made. These could be in critical need of concerted conservation action, and a red list assessment process would identify which species or taxa require greater protection and conservation effort, whether through national legislation or European Directives. The results of such research should be made available to decision-makers, at all levels, through the National Biodiversity Data Centre.

The Heritage Council recommends the under-taking of conservation assessments for under-studied and unlisted taxa, particularly those in the marine environment.

The Heritage Council recommends that the results of the above-mentioned conservation assessments be used to amend schedules of protected species, either through national legislation or European Directives, as appropriate.

The Heritage Council recommends that the results of research on Ireland's biodiversity are made accessible to decision-makers, at all levels, through submission to the National Biodiversity Data Centre.

❖ WOODLAND AND SCRUB

Comments in this section pertain only to hedgerows – these are considered to be linear/woodland scrub (Fossitt, 2000).

The maintenance and retention of our native hedgerows is vitally important for our landscape, and for our wildlife. They also contribute to water regulation. While the Wildlife (Amendment) Act 2000 prohibits the cutting of hedgerows between March 1 and August 31, except when required for road safety purposes, cut hedgerows are a common sight around the Irish countryside over the summer months. Greater effort needs to be made to manage hedgerows during the winter months and to increase awareness of the restrictions on hedge-cutting over the summer months. Teagasc provide FETAC-accredited hedgerow cutting training. Efforts should be made by hedge-cutting contractors to avail of these courses, while those who require the services of hedge-cutting contractors should require that contractors have completed the course.

Efforts should also be made to highlight this regulation to the general public and landowners, many of whom may have hedges on their properties and may be unaware of the restrictions on hedge-cutting. Greater effort also needs to be made to the development of hedge-laying expertise, and this could be facilitated through the development of training courses.

The Heritage Council recommends that contractors who provide hedge-cutting services avail of the Teagasc-run, FETAC-approved hedgerow cutting training course.

The Heritage Council recommends that the availability of hedge-laying training be supported and increased.

The Heritage Council recommends that those who commission the services of hedgerow cutters (e.g. Local Authorities, the Electricity Supply Board, landowners) require that contractors have completed the Teagasc-run, FETAC-approved course.

❖ URBAN BIODIVERSITY

Ireland's population is becoming increasingly urbanised. With the ongoing development of our towns and cities, increasing fragmentation of habitats, and the impact of climate change, it is becoming increasingly important that our urban areas do not become "wildlife deserts" but form part of a functioning network of habitats that help to facilitate the movement of species and ensure that ecosystem functions in urban areas do not break down. This can also contribute to the health and longevity of an urban area, as research has shown the positive impact green spaces can have on anti-social behaviour.

The Heritage Council recommends the inclusion of a theme on urban biodiversity in the National Biodiversity Plan.

Such a theme should explore ways in which biodiversity can be enhanced and increased in urban areas, such as through the development of green infrastructure corridors and networks.

It should also include actions to encourage the retention of open watercourses in urban areas.

❖ **GOVERNMENT (National, Local, State Agencies)**

It is unclear where cross-cutting actions to be undertaken by Government departments, State bodies and local authorities would fit within the proposed structure of the Plan e.g. the review of relevant legislation, the enforcement of biodiversity-related planning conditions. Such actions are also critical to reducing and mitigating the impact of government plans and programmes on efforts to halt biodiversity loss.

Such a theme could also include commitments to undertake strategic environmental assessments for future national plans, such as the National Development Plan, and the integration of actions in the National Biodiversity Plan into the work programme of relevant departments and agencies.

The Heritage Council recommends the inclusion of a theme for Government actions (national, local and State agencies) that cut across specific habitat, species and sectoral issues. This could include, for example:

- *the review of relevant legislation, including the Forestry Act;*
- *the review of the enforcement of biodiversity-related planning conditions (e.g. hedgerow retention);*
- *the “biodiversity-proofing” of plans and policies;*
- *steps needed to enable the integration of actions in the NBP into the work programme of relevant departments and agencies;*
- *the development of further incentive schemes for the maintenance and protection of biodiversity;*
- *the review, and revision if necessary, of existing incentive schemes to increase their level of application and utilisation.*

The Heritage Council also recommends that when granting planning permission for developments or through County Development Plans, Local Authorities should require the retention, maintenance or development of biodiversity or wildlife spaces within developments. Efforts would also need to be made to ensure the enforcement of this requirement.

The Heritage Council also recommends that future national plans and programmes, e.g. the National Development Plan, should be the subject of a strategic environmental assessment.

❖ RECREATIONAL ACTIVITIES

In recent years, the use of our natural environment for recreational activities has greatly increased. While this can have positive impacts on biodiversity by increasing our appreciation of our natural environment, heritage and biodiversity, and our desire to conserve it, it can also have negative impacts, if it is not managed well. For example, the Article 17 report notes that the use of many of our sensitive coastal habitats (particularly dune systems) for recreational activities (such as horse-riding, trampling and off-road driving) is having a detrimental impact on their conservation status. Actions relating to the assessment, reduction and mitigation of any negative impacts of our recreational use of natural heritage should be included in the new National Biodiversity Plan.

It is also clear from *Valuing Heritage in Ireland* that use of our natural heritage for recreational purposes is extremely important to the public, and is part of their motivation for its protection. This is also recognised in the commitment under the National Development Plan to “*maintain and enhance way-marked ways, agreed walks, bog roads etc*”. However, it is important that access to and the recreational use of our biodiversity is set clearly in the context of ensuring that the potential impacts on biodiversity are considered, assessed and measures identified to minimize them. This will be particularly important in efforts to improve the conservation status of particular habitats. Such measures could be developed at the national or local level. For instance, the development of beach management plans by Local Authorities could potentially address the issues of recreation and their impact on coastal habitats, while the promotion of the Leave no Trace principle is applicable to all areas of the countryside.

The Heritage Council recommends the development of a range of measures, including local/regional outdoor recreation strategies, underpinned by the principle of sustainable access, beach management plans, to mitigate and reduce any negative impact of recreational activities on our natural heritage, as well as the promotion of the Leave no Trace principle.

❖ REVIEW OF THE NBP 2008-2012

The first National Biodiversity Plan included sections on the monitoring and review of the Plan itself. This identified at an early stage when an interim review would be undertaken. Likewise the second Plan should outline a review process of its implementation, measurement of its impact and identification of factors affecting its successful implementation, if any. This should all be undertaken at a timescale that will allow it to inform the development of the third National Biodiversity Plan.

The Heritage Council recommends the inclusion of a theme on the monitoring and review of the Plan itself, including actions on:

- *a proposed process for interim and final review of its implementation,*
- *measurement of its impact and*
- *identification of factors affecting its successful implementation, if any.*

3.3 Themes already proposed for inclusion in the NBP 2008-2012

❖ PROTECTED AREAS (including National Parks and Natura 2000 areas)

It is not stated in the title of this theme if Natural Heritage Areas and Nature Reserves should be considered here. This is assumed to be the case but the various types of protected areas should be explained in the Plan.

The National Parks and Wildlife Service recently completed a report on the status of Ireland's habitats and species, with regard to those listed under the Habitats Directive (known hereafter as the Article 17 report). A summary report is currently available from NPWS, with a publication due shortly. This report is a critical piece of research, vital to informing the development of the 2nd Biodiversity Plan, particularly as it considers the status of habitats and species, across the country, and not solely in designated areas. In addition, recent rulings by the European Court of Justice concerning our failure to fulfil certain obligations under the Birds and Habitats Directives illustrate how much needs to be done for these areas.

According to the Article 17 report, the majority of habitats are deemed to be in "inadequate" or "unfavourable" condition. Clearly much needs to be done to improve this situation, including greater attention to be given to maintaining and improving the structure and function of our habitats. Management Plans for these sites should include consideration of these functions, as should planning decisions relating to land within and near Natura 2000 sites. Ensuring planning authorities have access to the necessary information pertaining to the location of these sites, the legislation and their ecological role is also crucial (see earlier recommendation regarding a National Habitat Survey).

Enforcement of the protection afforded to these sites is also clearly an issue and the allocation of resources to this need to be increased, both in terms of financial resources but also in terms of staff capacity.

The Heritage Council recommends that the findings of the Article 17 report should be used in the identification of key actions for the conservation of habitats and species, in the 2nd National Biodiversity Plan.

The Heritage Council recommends that greater consideration be given to maintaining the integrity of Natura 2000 sites, including the maintenance of their structure and function, particularly with regard to land-use and planning decisions, in and near the sites.

The heritage Council recommends that greater resources be allocated to ensuring enforcement of the protection afforded habitats and species under the Birds and Habitats Directives, and national legislation.

The Heritage Council recommends the development of biodiversity guidelines for Local Authorities, in an easily accessible format, with an accompanying training scheme. These should include information on relevant environmental legislation and the legal responsibilities of local authorities, as well as best practice in relation to protecting biodiversity and managing natural heritage. These should build on the draft guidelines already prepared and in use by two local authorities.

The Heritage Council recommends that immediate steps be taken to address the recent findings of the European Court, concerning the application of the Birds and Habitats Directives in Ireland.

Note: A recommendation concerning communications needs for Natura 2000 sites is included under the theme Communications, Education and Public Awareness.

Community and Public Engagement:

The provision of opportunities and support for community groups, non-governmental organisations and others to engage in active, on-the-ground biodiversity conservation can also be extremely beneficial to the management and enhancement of designated sites, as well as creating a sense of ownership of our biodiversity, amongst the public. In 2006, 2007 and 2008, the DoEHLG has provided funds to the Heritage Council for the establishment of a Biodiversity Fund to support projects aimed at conserving and managing biodiversity at site level. The continuation of this Fund on a long-term basis, rather than year-to-year, would help to increase the impact of the Fund at a local level.

The Heritage Council recommends the continuation of the Biodiversity Fund on a long-term, multi-annual basis.

Landscape: In recent years, the Heritage Council has highlighted the need for national park legislation. None currently exists in Ireland and the Department of Environment, Heritage and Local Government is considering providing some legislative base for the existing parks. New legislation should not just provide for what currently exists but should also consider the protection and development of the “whole landscape”, including national parks and designated areas. The Heritage Council has also promoted an extension of the existing national park system, a development not predicated purely on state ownership but rather on partnership and co-operation with a wide range of landowners. New legislation could allow for this, or the use of the existing planning act provision that allows designation of Landscape Conservation Areas. The development of a National Landscape Programme would complement and incorporate such an approach.

The current Programme for Government contains a commitment to prepare a National Landscape Strategy and the National Biodiversity Plan has an important role to play in its development. Ireland signed and ratified the European Landscape Convention (ELC) in 2002- this requires European States to implement a range of actions in relation to landscape, of which biodiversity, national parks and designated sites are clearly a critical component. In the last ten years, Ireland has experienced unprecedented urbanisation and landscape fragmentation due to extensive new housing, major roads and other infrastructure projects. This has, in turn, affected open countryside, and our biodiversity, as well as villages and towns in all parts of the country. Thus:

The Heritage Council welcomes the development of a National Landscape Programme, offers to work in close collaboration with the Department on such a Programme and welcomes the emerging National Biodiversity Plan as an important element in its overall delivery.

The Heritage Council also recommends the provision of legislation for national parks; this could be incorporated into the development of the National Landscape Strategy.

❖ AGRICULTURE

It is unclear from the proposed structure of the Plan whether this theme is to focus on biodiversity found in agricultural habitats or on the impact of the agricultural sector on biodiversity. Both of these aspects need to be considered within the context of the Plan, but recommendations made here focus specifically on cross-cutting actions rather than habitat-specific actions.

In the first National Biodiversity Plan, the then Department of Agriculture, Food and Rural Development was called upon to set up a systematic evaluation process for the Rural Environment Protection Scheme (Action 60). This has not yet happened. There is a huge level of investment of public funds in the Scheme but to date there has been no assessment of value for money or the impact of the scheme on biodiversity at a farm level, whether positive or negative. It is imperative that such an evaluation process be established in the immediate future, particularly before the development of any REPS 5 Scheme. This is particularly important as measures under REPS may have unforeseen impacts on biodiversity, that could be easily mitigated if they are identified.

The European Union's "Action Plan to 2010 and Beyond" includes a target to ensure that "member states have optimised use of opportunities under agricultural, rural development and forest policy to benefit biodiversity". An evaluation of the effectiveness of REPS, and its impact on biodiversity, would contribute to this target. Such an evaluation could also help to deliver on the REPS objective to "promote [inter alia] the conservation of high nature-value farmed environments which are under threat" and other actions in the EU Plan concerning high-nature value farmland. Teagasc are already exploring how such an evaluation could be done.

The Heritage Council recommends the immediate development and adoption of a scheme to evaluate the effectiveness of REPS – this should include an assessment of the delivery of all of its objectives, its impact on biodiversity, and help to identify measures to support the conservation of high-nature value farmland.

The maintenance of low-intensity High Nature Value Farming is also a priority within the EU Plan and the European Agricultural Fund for Rural Development (EAFRD). This clearly reflects the importance of HNV farming for European biodiversity conservation, as well as for rural development. It also reflects the need for biodiversity conservation to be undertaken across the landscape, and not solely within designated areas. High Nature Value Farming is under increasing threat, primarily because of intensification of farming practices or from the abandonment of farming altogether. The abandonment of traditional agricultural practices is also reported to be having a detrimental impact on habitats included in the Habitats Directive. There is clearly a need for the development of strategies to help maintain and support these high-nature value farmland areas.

The establishment of a Countryside Survey (see earlier recommendation) could also provide the necessary on-the-ground information to identify how changing land-use patterns are impacting on biodiversity, and feed directly into the development of appropriate policies.

The Heritage Council recommends the urgent development of implementation strategies to specifically support high nature value farmland areas.

❖ FORESTRY

As with the section on Agriculture, it is unclear whether this theme is to focus on forested habitat, or specifically the forestry sector. As mentioned earlier, “forestry” is not relevant to all forested habitats so this intent should be clarified in the draft Plan. The comments here focus on the forestry sector, and not all issues affecting forests, woodland, hedgerows, scrub etc. In the NBP, actions concerning the latter should be addressed under a separate theme on woodland habitats, as recommended earlier.

In 2007, the Heritage Council commissioned a review of the Heritage Council’s existing forest policy. This had last been reviewed in 2002 – the same year that the first National Biodiversity Plan commenced. Since 2002 significant developments have occurred in the forestry sector, including changes in national forest policy, the expansion of forest certification, awareness of climate change, the emergence of alternative wood products such as wood fuel, and the focus on non-timber benefits such as recreation and public health, biodiversity, carbon sequestration and protection. The review of Council’s forest policy is still in progress; on completion, a copy of the final Heritage Council Forest Policy Review will be forwarded to the Department. The Heritage Council hopes that this will be in sufficient time to be considered in the development of the National Biodiversity Plan 2008-2012.

In the interim, the primary (draft) recommendation of the Policy Review calls for the development of a new National Strategic Plan for Forestry, founded on the principles of multifunctional forestry. This should have specific goals for defined short- and medium terms and guiding policies for the long-term. It must start with a fundamental review of the purpose of forests and how they can be managed to maximise benefits for forest owners and society.

The Heritage Council recommends the development of a new National Strategic Plan for Forestry.

❖ MARINE AND COASTAL

Ireland's National Biodiversity Plan issued in April 2002 notes that biodiversity 'is an integral part of Ireland's heritage'. It states that the planned coastal zone management programme should "have as a core objective, the conservation of the best remaining areas of importance for biodiversity in the coastal context". Apart from establishing a limited number of Special Areas of Conservation (SACs), so far there is little concrete progress in protecting Ireland's marine biodiversity.

The Heritage Council recommends:

- *the further development and implementation of marine SACs (including near-shore),*
- *the establishment of a suitable consultation procedure between all relevant government departments with a marine mandate, and the NPWS on all matters relating to use and development of living marine resources and their habitats;*
- *and the allocation of appropriate resources to marine mapping.*

The Heritage Council recommends that within any sites designated under the EU Directives there should be no expansion of existing, or establishment of new, fisheries until a time that stocks have recovered to good ecological status;

The Heritage Council recommends that in order to conserve biodiversity within designated sites and in buffer zones around these, a network of no-take zones or sanctuaries should be established, precluding access and/or particular methods of exploitation;

The Heritage Council recommends that management of Ireland's marine and coastal areas should be undertaken at an ecosystem level.

The Heritage Council also recommends that any new development in maritime areas is sustainable and steps are taken to ensure that biodiversity is not diminished. This can be achieved by:

- *Vigorous use of, and cross compliance with existing mechanisms such as the Strategic Environmental Assessment (SEA) Directive and the Environmental Impact Assessment (EIA), Birds and Habitats Directives, and the Water Framework Directive. The SEA and EIA process should be used for all activities in the maritime area, including fishing and aquaculture.*
- *Use of existing regional agreements such as the OSPAR Commission for the Protection of the Marine Environment of the North-East Atlantic, and the Baltic Marine Environment Protection Commission (HELCOM).*
- *A National Integrated Coastal Zone Management Strategy to deal with the inter-sectoral pressures on land/sea interface.*
- *Use of research in informing marine- management initiatives.*

The Heritage Council also recommends that additional data is needed to ensure that coastal habitats are protected from unsustainable planning in coastal regions. This includes:

- *Information on potential climate change impacts on the coast.*
- *Landscape/seascape and sea bed assessments (including Historic Landscape Characterisation of coastal areas – this includes the intertidal zone).*
- *Identification of natural coastal processes in each area – i.e. where erosion, flooding is likely.*
- *Promotion of spatial planning concept and other tools for managing the sea.*

Off-shore activities: Seabed surveys and other research programmes have revealed the wealth of resources in Irish waters, including aggregates and the potential for offshore energy production. However, resource extraction, coupled with the over-exploitation of Ireland's traditional fisheries, and the effects of climate change pose significant threats to marine habitats, (particularly sand-banks), food-chains and communities.

The Heritage Council recommends the development of integrated policies for our seas based on the United Nations Convention on the Law of the Sea, of which Ireland is a signatory.

The Heritage Council recommends the undertaking of a Strategic Environmental Assessment of the impact of Ireland's renewable energy policy on the marine environment, including:

- *an assessment of the cumulative effects of multiple licenses;*
- *an assessment of the long-term impacts of offshore wind farms and tidal barrages on the natural heritage;*
- *the prohibition of the development and extraction in designated areas and habitats and other biologically diverse underwater sites (e.g., cold-water reefs).*

Water quality: The Heritage Council sees the protection and wise management of seawater quality, and the quality of the underlying sediments, as key requirements in preserving Ireland's natural marine heritage. The Council supports the aims of the Water Framework Directive whilst recognizing that implementation of the Directive in the context of the marine environment presents significant technical and administrative challenges. The Heritage Council believes that continued use of Best Environmental Practice as a tool in managing and regulating practices affecting seawater to be an appropriate and entirely consistent adjunct to WFD implementation.

The Heritage Council recommends coordination between key state agencies in the implementation of the coastal aspects of the Water Framework directive. It is essential that ecological reference values for marine water-bodies take into account natural variability and, in the case of naturally-occurring pollutants, local geochemistry.

The Heritage Council recommends that research to improve the understanding of natural variability in Irish estuaries and coastal waters should be significantly expanded.

Coastal erosion is largely a natural process and the coast forms an important element of Ireland's heritage. Coastal protection works that comprise hard engineering solutions are regularly applied in Ireland without due consideration, and often causing great damage, to natural coastal processes and sediment movement. Such works are cited regularly in the Article 17 report as a threat to coastal habitats. Often 'soft engineering' solutions can be more appropriate and offer greater value for money than their alternative.

The Heritage Council recommends the development of an unambiguous national policy for erosion management, with a strong element of public education, in order to avoid excessive costs and negative impacts of inappropriate coastal protection schemes that afford no gain to long-term coastal protection.

Marine fisheries management:

Ireland has a number of traditional fisheries and many coastal communities depend on fishing for their livelihood. Thus, management to ensure sustainable fisheries contributes to the needs of both humans and wildlife. However, negative impacts on biodiversity from fishing include:

- ❖ stocks being exploited beyond recovery levels;
- ❖ damage by trawling gear to sea-bottom habitats; and
- ❖ by-catch of non-target species (e.g., fish, seabirds and mammals).

Over-fishing is the principal factor in the decline of certain Irish sea fisheries although pollution and, more recently, climate change may also have contributed. Despite constant refinement, and a shift from annual to multi-annual management programmes, management measures have failed to prevent the serious declines that have occurred in recent years. Although stock assessment has improved greatly in recent decades, it is still difficult for fisheries scientists to determine the extent to which changes in stock status result from over-fishing, environmental factors or both. Thus, scientists endeavor to counter-balance the uncertainty inherent in stock estimates by recommending precautionary levels of Total Allowable Catches (TACs). It is imperative that scientific advice on TACs is implemented by the responsible agencies.

The Heritage Council recommends an increased level dialogue between DCMNR, the Marine Institute, Bord Iascaigh Mhara, and NPWS with regard to reducing the impact of fishing, especially bottom-trawling, on certain sensitive marine habitats and communities.

The Heritage Council also recommends that the biodiversity of our ocean resources and marine environment be protected by:

- *Ensuring integrated planning of maritime coastal and land based activities. This would include aquaculture, agriculture, Common Fisheries Policy.*
- *Bio-security policies to control the spread of non-native species, to protect marine protected areas, and to protect against Illegal, Unregulated and Unreported (IUU) fishing.*
- *Continue to manage fish stocks on the basis of safe biological limits;*
- *Science-based determination of Total Allowable Catches (TACs);*
- *Delay expansion of deep-water fisheries until species' life histories, especially growth rates, stock identities and reproductive biology have been determined;*
- *Introduce Environmental Impact Assessments as a pre-operational requirement for new fisheries;*
- *Encourage the use of selective fishing gear to reduce the catch of juveniles and by-catch of cetaceans, seals and other non-target species and to avoid damage to benthic communities;*
- *Set minimum sizes for various commercial fish and shellfish species;*
- *Eliminate discarding of unwanted fish at sea;*
- *Enforce closed areas and seasons in order for nursery grounds and juvenile stocks to mature;*
- *Continue stock recovery programmes for species under threat;*
- *Establish marine environment protection schemes (e.g. Special Areas under MARPOL 73/78, Annex 1); and*
- *Enforce regulations governing wild salmon and trout exploitation.*

INLAND WATERWAYS

It is not clear whether this theme Inland Waterways includes all rivers, lakes and ponds, or solely navigable inland waterways (as is sometimes understood by the term Inland Waterways). This needs to be clarified in the Plan.

In recent years, the recreational use of our inland waterways and rivers has greatly increased, with the development of amenities, re-connection of previously distinct canal systems and an increasing level of disposable income in Ireland that has led to increased boat, leisure-craft usage and size of leisure craft. Such levels of increased access may have unforeseen impacts on biodiversity in our rivers- such as the potential impact of boat-wash (*i.e.* the wake of the boat) on nesting sites on navigable rivers, and rates of bank erosion.

The Heritage Council recommends that research be undertaken to investigate the impact of boat-wash on biodiversity in our waterways.

One of the most important aspects of our inland waterways is the biodiversity that they support. Species of birds, insects, mammals, as well as a spectrum of important habitats ranging from callows to lakes, are found in the inland waterways system. Man-made canals have created corridors along which water-based and terrestrial flora and fauna move, creating a particular and unique ecology. Inland water ecosystems are threatened by a wide range of issues including pollution, drainage, alien species, peat extraction, acidification, gravel extraction, and erosion due to over-grazing.

The *National Biodiversity Plan* (April 2002) promotes a catchment approach to protecting and improving water quality and management in line with the requirements of the Water Framework Directive. Water quality is integral to the health of the inland waterways environment, as well as affecting visitors and users. The improvement and maintenance of good or high quality water status, and of aquatic and terrestrial habitats, as stated in the WFD and National Biodiversity Plan, should be attained through the support of the forthcoming River Basin District Plans and the Nitrates Action Programme.

The first *National Biodiversity Plan* also requires agencies such as Waterways Ireland, ESB, and Bord na Móna, to draw up their own biodiversity plans, all of which will contribute to the protection of the biodiversity of our waterways.

The Heritage Council urges these bodies (i.e. Waterways Ireland, Bord na Móna and ESB) to allocate sufficient resources to implement and monitor the actions in these plans.

Many areas of our waterways are designated sites under the Birds and Habitats Directives (Special Protection Areas, Special Areas of Conservation) and the Wildlife Act 2000 (Natural Heritage Areas). The management plans for these areas should be drawn up in consultation with the landowners affected, and adequate resources provided to implement them. The involvement of landowners and local communities in the management of designated areas is vital to their long-term protection.

The Heritage Council recommends that management plans for designated areas, including inland waterways, should be drawn up in consultation with the landowners affected, and adequate resources provided to implement them.

While it is important to protect the sites designated under the Birds and Habitats Directives the biodiversity found in areas located outside these sites requires our attention too. The Heritage Council has conducted five Waterway Corridor Studies covering parts of the Grand and Royal Canals and the entire Shannon navigation. These studies (listed below and

available at <http://www.heritagecouncil.ie/waterways/index.html>) include recommendations for policy and action for biodiversity and our natural heritage. The appendices to the studies also include habitats and species requiring special attention.

- ❖ The Shannon Navigation from Shannonbridge to Meelick, and the Grand Canal from the Shannon to Ballycommon (2001-2);
- ❖ The Shannon Navigation from Lanesborough to Shannonbridge (which includes Lough Ree and the Suck Navigation) (2003-4);
- ❖ The Shannon Navigation from Roosky to Lanesborough, the Royal Canal Main Line to Thomastown, and the Longford Branch of the Royal Canal (2003-4);
- ❖ The Shannon Navigation from Lough Allen and Lough Key to Roosky (2004-5);
- ❖ The Shannon Navigation from Meelick to Limerick (including Lough Derg), 2006.

The Heritage Council recommends that findings of the Waterway Corridor Studies be considered in the development of the NBP, and their biodiversity-related recommendations included within it.

❖ WETLANDS

According to the Article 17 report, many of our wetland habitats are in inadequate or unfavourable condition. Illegal dumping, infilling and waste permitting of wetland sites continues around the country with little appreciation for the valuable role wetlands play, e.g. in flood control. Although a range of legislation and directives are in place to improve water quality, protect certain wetland sites etc, our wetlands are still in a precarious position.

The Heritage Council recommends that:

- *greater attention needs to be paid to the enforcement of existing legislation to protect wetlands, and all Natura 2000 sites,*
- *greater resources need to be invested in such,*
- *and the education of those involved in activities which impact upon them (e.g. waste permitting) also needs to be increased.*

(also see earlier recommendation for biodiversity guidelines and training for local authorities).

An additional important element to ensure the wise use of our wetlands is to increase our knowledge of their occurrence and distribution. National surveys of wetland habitats, such as fens, will provide the critical information necessary to inform and improve decision-making at the national and local level. The need for such surveys was highlighted by Minister John Gormley's recent commitment to a National Fen Survey (during the Minister's speech at the Wise Use of Wetlands Conference, Monaghan, 1 February 2008).

The Heritage Council recommends that the National Fen Survey be prioritised for commencement in 2008.

While many sites identified under the Ramsar Convention and as Important Bird Areas (IBAs) are already in the list of sites designated under Birds and Habitats Directives (SPAs, SACs), efforts should be made to ensure all RAMSAR sites and IBAs are given appropriate statutory protection. Steps should be taken to realise the commitment by Ramsar contracting parties, of which Ireland is one, "to formulate and implement their planning so as to promote the conservation of the wetlands included in the List, and as far as possible the wise use of wetlands in their territory' (Ramsar Convention Article 3.1). The convention defines wise use of wetland as, "their sustainable utilization for the benefit of mankind in a way compatible with the maintenance of the natural properties of the ecosystem".

The Heritage Council recommends the wise use of wetlands as committed to under the RAMSAR convention and the effective protection of all RAMSAR sites and International Bird Areas.

❖ COMMUNICATION, EDUCATION AND PUBLIC AWARENESS

COMHAR's *Recommendations on the Implementation and Review of the National Biodiversity Plan* (2005) notes that "Delay in publishing the Plan and the lack of a Public launch meant that the Plan was not the call to action, or promoted actively, so there was little response in terms of implementation". To develop the 2nd NBP, the DoEHLG has, thus far, held one experts/stakeholders consultation and two public consultation meetings. It is clear that if the second NBP is to have a higher level of engagement than the first, a dedicated communications strategy to highlight its importance (and that of biodiversity) and its relevance to the general public, is essential. The DoEHLG's Notice Nature Campaign is currently targeting specific sectors of business and industry in order to change behaviour; this will run until the end of 2008.

Given the results of a recent Eurobarometer study that found that 45% of Irish respondents (the highest level in the EU) stated they "didn't know" the meaning of biodiversity loss; and only 1% knew what the Natura 2000 Network is. (*Note that for the Valuing Heritage in Ireland Report research, those surveyed were shown photographs to illustrate areas of heritage, including natural heritage*). These results show that, in Ireland, much more remains to be done, to illustrate and explain the role of biodiversity, its value and its importance to our everyday life, and our efforts to manage and protect it.

The Heritage Council recommends that greater resources (both staff and financial) be allocated to communicating the role and benefits of conserving our biodiversity, and in particular, the role, value and ecosystem services provided by the Natura Network and other protected sites, to the general public. Using staff to communicate and explain the relevance of work on-the-ground should be a key part of such a strategy and is essential to the delivery of the Plan and its objectives.

In addition, the Heritage Council recommends:

- *the development of a national biodiversity communications strategy that works to promote the key objectives of the Plan. It should include evaluation mechanisms and aim to coordinate the actions of the key actors for biodiversity. This should also include the development of a clear brand identity for the Plan, and actions implemented under the Plan should be "labelled" as contributing to the Plan. This will help to raise the public profile of the Plan and its delivery.*
- *that organisations that communicate on biodiversity issues develop specific online resources for the press and media.*
- *the addition of a communications and environment module to be added to the third level Communications courses (e.g. Dublin City University Communications MA).*
- *The development of new initiatives to encourage the participation and education of community groups in biodiversity conservation, in addition to those that currently exist such as the Tidy Towns Biodiversity Award.*

The Heritage Council recommends the following educational initiatives:

- *Improve biodiversity training for teachers at Primary School Teacher Training colleges nationally.*
- *Support PhD scholarships on multi-disciplinary approaches to biodiversity, for example, in partnership with the Irish Research Council for the Humanities and Social Sciences.*
- *Develop environmental education modules at third level for key professional sectors that have a direct impact on biodiversity loss such as engineering and planning.*
- *Expansion of the Heritage in Schools Scheme beyond the primary school to continuing education/community outreach education.*
- *Provide summer programme such as "junior rangers" for interested teenagers.*
- *Set up a cross-disciplinary working group (including teachers) to identify opportunities to incorporate biodiversity into the curriculum.*
- *Develop Irish materials for the primary school sector on biodiversity.*

An increased level of civic involvement in voluntary environmental non-governmental organisations would enhance public capacity to be responsive to environmental and biodiversity conservation issues. The provision of central support to such NGOs is crucial in increasing their capacity to communicate with the public on critical biodiversity conservation issues, whether on policy matters or on-the-ground issues. In November 2007, Minister John Gormley announced an increased level of funding would be provided to ENGOS- such a move is to be greatly welcomed.

The Heritage Council recommends that funding and support to environmental NGOs be maintained, and enhanced, to allow them to build capacity and more effectively reach target audiences to communicate on key biodiversity issues.

❖ **BUSINESS AND BIODIVERSITY**

There are many sectors of industry and production in Ireland whose actions have an impact on biodiversity that are not suggested as being the focus of particular themes. This submission does not consider all areas of business but focuses on the general area of business.

The Notice Nature Campaign has recently developed biodiversity guidelines for Business, Tourism and Construction. Identifying the ways in which business impacts upon biodiversity, and how this can be reduced, is critically important. Encouraging the application of the guidelines by business is also necessary. Various mechanisms to encourage this should be explored, for example, through incentives or awards schemes, such as a business version of the Tidy Towns Biodiversity Award.

The Heritage Council recommends that efforts to engage various sectors of business be continued and enhanced, with particular emphasis being placed on actions that will ensure the application of the biodiversity guidelines, such as incentives and awards schemes. This could also include communications initiatives that highlight the links between biodiversity and business, and to appeal to non-traditional audiences on biodiversity issues.

❖ CLIMATE CHANGE

Climate change is now occurring and the impact on our biodiversity is in progress, but unquantified. If current projections of temperature change are accurate, it is reported that our species will need to (generally) migrate in a north-easterly direction to find conditions to which they are already adapted. This will obviously have an implication on the effectiveness of our designations, their structure and function and their potential for coherence as a network of ecologically functioning sites.

The Heritage Council, in partnership with Fáilte Ireland, is currently conducting research on the Impacts of Climate Change on the Coast and Inland Waterways with implications for Tourism. It is hoped that this work will be completed by mid-2008; the Heritage Council will forward the research findings to the Department when available, and hope they will be in sufficient time to contribute to the development of the National Biodiversity Plan.

The Heritage Council recommends that the potential impact of climate change on our designated areas should be considered and assessed, with mitigation and adaptation options developed and integrated into relevant policies and strategies as appropriate. This should be done in collaboration with relevant agencies in Northern Ireland.

As all maritime communities, industries and activities will be affected by climate change, it is essential that monitoring of key marine climate indicators (*i.e.*, physical and biological) is sufficient to develop the best possible capabilities for climate-modelling and prediction. The effects of climate change are already evident in European seas.

Predicted increases in storm intensity and rising sea levels will exacerbate coastal erosion and flooding with implications for both natural and man-made heritage features. Changes in sea temperatures and salinity will have significant impacts on marine organisms and food-chains, fishing and aquaculture activities. Accordingly:

The Heritage Council recommends that the likely effects of climate change must be taken into account when considering actions required to protect and manage marine biodiversity.

The Heritage Council recommends accelerated investment and activity to measure key marine climate change indicators.

Research also needs to be undertaken into the impact of climate change on disease, as the behaviour of diseases are also likely to change as a result of changing environmental conditions.

The Heritage Council recommends the undertaking of research on the potential changes to the behaviour of diseases that affect native biodiversity.

❖ SPECIES CONSERVATION

Unprotected species:

Recommendations were made earlier in this submission, under the proposed theme “Baselines and Monitoring” concerning the need for increased levels of research on unprotected species that are also under-studied and under-recorded, particularly in the marine environment, as well as assessments of their conservation status and the application of the research results, so these will not be repeated here.

Protected species:

In the Article 17 report, the status of the majority of Annexed species was concluded to be favourable. While this is a promising result, the less positive conclusions regarding our habitats means that the continuation of this status for our species cannot be taken for granted. It is also important to note that the status of bird species is not included in this report, as they are protected under another EU Directive.

Particular attention will need to be given to those that were assigned “poor” and “unknown” status, as well as those that occur in habitats of “inadequate” and “unfavourable” status and to the development of management plans and research programmes for these species.

However, we cannot afford to be complacent about those species that are currently assigned “favourable” status, particularly if they occur in habitats of “inadequate” and “unfavourable” status: this may mean it is simply a matter of time before an impact is seen in population levels. These results should also be reviewed and actions identified that will help to secure and enhance their conservation status, and reduction of potential threats.

The Heritage Council recommends that further actions be identified to:

- *reduce the pressures on Annexed species, as identified in the Article 17 report;*
- *develop research programmes to fill information gaps for species of “unknown” status.*

Habitat fragmentation and its impact on structure and function, as well as on the species that use the habitat, are of increasing concern. Ireland has seen an unprecedented level of road construction over the past ten years and communication networks, including roads, are identified as one of the major pressures on species listed under the Habitats Directive. The National Roads Authority has developed a range of guidelines to reduce and to mitigate the impact of road development on the environment, including the construction of underpasses for mammals, and these are to be welcomed. However:

The Heritage Council recommends that a review be undertaken of the level of application of the NRA’s environmental guidelines in road construction schemes and measures identified to increase both their application and their effectiveness.

❖ INVASIVE SPECIES

Invasive species are regularly identified as one of the major key threats to habitats and species in Ireland. An All-Ireland Invasive Species Initiative has been established by the National Parks and Wildlife Service and the Environment and Heritage Service to implement the recommendations of the 2004 Invasive Species Ireland Report. This is an excellent development and is to be welcomed. It is important that continued support be given to the Initiative, as well as to on-the-ground activities to eliminate such species at the local level, such as through the Biodiversity Fund. The Initiative will also be making recommendations in the coming months concerning measures that can be taken to mitigate this threat.

The Heritage Council recommends that support continue to be provided to the All Ireland Invasive Species Initiative, as well as to on-the-ground activities to eliminate such species at the local level.

The Heritage Council also recommends that due regard be given to the forthcoming recommendations from the Initiative and resources made available to implement them.

❖ GENETIC RESOURCES

The conservation of our genetic resources is an essential component of the conservation of our biodiversity. It is critical that efforts are made to enhance the genetic diversity of the species that occur here. Maintaining the genetic diversity of our wildlife will help to contribute to resilient and healthy ecosystems, and the maintenance of ecosystem functions. This could become increasingly important as the impacts of climate change progress.

There is some recent anecdotal evidence that the use of hedgerow stock of non-native provenance is far greater than the use of native stock, and that these non-native plants suffer from diseases previously unseen on hedgerow plants of native provenance. This may have implications for the time of flowering and the availability of food resources for particular species that depend on hedgerow plants, as well as the longevity of the hedgerow. While this has not been confirmed or quantified, it is an issue that warrants investigation, particularly given the level of hedgerow planting that will occur under REPS4.

Garden Centres, or retailers that sell plants, could also provide a critical opportunity to raise awareness amongst the public about the importance of conserving our native plants, and using plants of local, rather than foreign, origin. Incentives could also be developed to encourage the establishment of nurseries for native plants, as well as to encourage consumers to purchase them.

The Heritage Council recommends that research be undertaken to examine the level of availability of hedgerow stock of native provenance, and to identify any reasons why it may not be readily available. Recommendations should also be made as to how to increase the availability of stock of Irish provenance, if necessary, working with potential partners in the forestry sector.

The Heritage Council encourages the development of incentives to promote and increase the establishment of nurseries for native plants, of native origin. Efforts should also be made to encourage the consumer to purchase native plants.

❖ LOCAL BIODIVERSITY ACTION PLANS

The Department of the Environment, Heritage and Local Government, and many Local Authorities, are to be commended on their efforts in recent years to move forward in the development of local biodiversity action plans and to start leveraging funding for their implementation. There are two particular factors that the Heritage Council would like to note that will have long-term implications for the success of the plans, their delivery, and their potential to contribute to our current target of halting biodiversity loss. These are:

- availability of sufficient human resources to ensure delivery of the Plans (Biodiversity Officers)
- availability and long-term security of financial resources for delivery of the Plans

Biodiversity Officers:

The need for biodiversity officers in Local Authorities has been recognised for several years. In the first National Biodiversity Plan, Local Authorities were called on to “designate a contact officer for natural heritage conservation matters in its area” (Action 11) as well as to “prepare a Local Biodiversity Plan in consultation with relevant stakeholders”. However, these actions do not go far enough and in themselves will not result in sufficient action to ensure local biodiversity plans make a meaningful contribution to the halting of biodiversity loss. At the time of writing, there are only five Biodiversity officers in post. In addition, there are now Heritage Officers in 27 Local Authorities, who deal with all heritage issues, just one of which is biodiversity.

In the Heritage Council’s discussions with Heritage Officers during the development of 18 Local Biodiversity Plans in 2007, it was widely recognised and noted by the Heritage Officers that the appointment of Biodiversity Officers would be critical for the delivery of the Plans, and without additional capacity, implementation could move forward only in a limited way.

While the Heritage Council recognises that the Government does not approve of additional posts in the public service, the Heritage Council believes that Biodiversity Officer posts in Local Authorities should be recognised as an exception. Such posts will prove critical in ensuring Ireland’s biodiversity- particularly that outside designated areas- is protected, conserved and enhanced, as well as its contribution to quality of life, our health and our economic well-being.

The Heritage Council recommends that

- i. the approval for additional Biodiversity Officer posts is received from the Department of the Environment, Heritage and Local Government with the sanction of the Department of Finance.*
- ii. The Biodiversity Officer post must be an additional number to the staff complement of Local Authorities and must not impinge on existing Local Authority Staff Resources.*
- iii. Specific purpose funding for the full costs of Biodiversity Officer posts be provided to Local Authorities by the Department of the Environment, Heritage and Local Government.*

Financial resources:

The availability of financial resources is clearly crucial to the delivery of the local plans. This should be established on a medium to long-term basis, rather than year-by-year, as the latter undermines long-term commitment to the Plans, and ultimately, impact. A comparable scheme is that operated by the Heritage Council for the implementation of County and City Heritage Plans: Heritage Officers apply in one calendar year for funding of projects in the next calendar year, and the Local Authorities provide a certain percentage of the funding required. This enables work programmes to be planned at an appropriate time-scale and ensures a level of commitment from Local Authorities to the Plan’s success.

The Heritage Council recommends that a dedicated funding stream be established to support the delivery of Local Biodiversity Plans; this should be allocated on a specific-purpose basis.

Other Issues

Many (draft) Local Biodiversity Action Plans noted the need to identify areas of local biodiversity importance (rather than national or international significance) over the lifetime of the local plan. Such areas could also act as “stepping stones” between Natura 2000 sites, thus contributing to the effectiveness of that network. Consideration should be given in the National Biodiversity Plan as to what measures may be required to support the identification and management of such sites, whether by the national or local authorities. While a funding stream to support the delivery of local Plans will clearly contribute to this, other mechanisms may be necessary to support their management. For instance, this could potentially be done through local development plans or local area plans.

The Heritage Council recommends that due consideration be given to identifying what mechanisms may be needed, at a national or local level, to protect any sites that are identified as being of local biodiversity importance.

Reviews of implementation and impact of Local Biodiversity Action Plans

As the vast majority of Local Biodiversity Action Plans are currently in a very early stage, many of them still going through the adoption process under Local Authority Strategic Policy Committees, it is perhaps too early to identify other critical factors affecting success. It will be crucial for Local Authorities to undertake reviews of the plans, in terms of delivery, impact and resource needs. These should be done on a mid-term basis or at least, a sufficient length of time before the development of a second Local Plan, to ensure lessons learned can be incorporated. The results of such reviews should be made available at the national level to facilitate the identification of national actions that can help deliver the Plan.

In addition, Local Authorities could consider the development of implementation strategies for the Local Biodiversity Plans in conjunction with partners, to identify resources required, potential funding sources and work packages.

The Heritage Council recommends that Local Authorities undertake regular reviews of the implementation and impact of Local Biodiversity Action Plans, and use the results of such reviews to inform the development of future Plans.