

Professor Jane Stout, Chair
Dr Mícheál Ó Cinnéide, Co-Chair
c/o Secretariat to the Review of the NPWS 2021
National Parks & Wildlife Service
90 King Street North
Dublin 7
D07 N7CV

Office of the Director General
Headquarters, PO Box 3000
Johnstown Castle Estate
County Wexford, Ireland
Y35 W821

Via email: reviewofnpws21@gmail.com

T: +353 539160600

F: +353 53 9160699

E: info@epa.ie

W: www.epa.ie

29 March 2021

My ref: EPAC0421/lett

RE: Strategic Review of the National Parks and Wildlife Service

Dear Professor Stout and Dr Ó Cinnéide

The Environmental Protection Agency welcomes the opportunity to provide an input to the strategic review of the National Parks and Wildlife Service (NPWS). The NPWS is an important stakeholder of the EPA, with whom we cooperate and coordinate on a number of common work areas in the interest of protecting the environment in Ireland.

State Of the Environment Report (SOER) 2020

The EPA publishes State of the Environment Reports every four years, most recently in November 2020. There was a specific chapter on Nature in the report and we acknowledge the key role and expertise of the NPWS in contributing to this chapter as well as to the nature aspects of the sectoral chapters.

The overall findings of the report were:

- that the quality of Irelands environment is not what it should be; environmental indicators are going in the wrong direction across many areas and that the outlook is not optimistic unless we accelerate the implementation of solutions across all sectors and society.
- Climate and biodiversity are two of the key challenges that Ireland urgently needs to address.
- An investment in the environment is also an investment in our health.

The SOER2020 also highlighted that now is the time for an overarching environmental policy position for Ireland - to be clear on our ambition to protect Ireland's environment in the short, medium and long-term and on our commitment to live up to the image of a Clean Green Island. A policy position would provide a national vision that all government departments, agencies, businesses, communities and individuals can sign up to, to play their part in protecting our environment.

The key messages from the SOER2020 Nature Chapter (pp 155) are:

- Ireland needs to prioritise actions to protect nature. The challenges facing key species should be the alarm calls needed nationally to focus on the transformative changes required in how we value and protect nature. More engagement on nature protection across stakeholder groups is needed, together with a review of governance, with solutions fast-tracked at policy and regulatory levels to protect habitats and halt biodiversity loss.
- The challenges involved in protecting Ireland's habitats and species are now more serious than ever and need urgent action. But nature can bounce back under the right conditions. Implementing national biodiversity policies, such as the National Biodiversity Action Plan, requires an increased level of collaboration and coordination across multiple sectors and the whole of society. This can also give rise to indirect co-benefits for other sectors and environmental issues such as climate change and water quality.
- Education, monitoring and citizen science initiatives are vital steps in protecting biodiversity. To promote more proactive and widespread engagement we need to continue to systematically survey habitats and species, track threats from invasive species and develop collaborative projects between scientists, farming sectors and the public. Regulatory aspects also need to be in place, with conservation plans for the management of Natura 2000 areas.

In the context of the Marine Environment, a key SOER2020 message (pp442) is:

- As an island nation with an extensive marine area, Ireland needs to ensure that robust governance and legal frameworks are in place to protect the marine environment.

The Conclusions of SOER2020 (pp427) observed in its summary assessment on Nature that 'deteriorating trends dominate, especially for EU protected habitats'. As regards the future outlook the SOER2020 stated (pp427) that Ireland is 'largely not on track to meet policy objectives.

The SOER 2020 (pp440) noted that to achieve the transformative change required to bend the curve of biodiversity loss, Ireland could learn from the conclusions of the recent report of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) where it recommended five interventions or levers (IPBES, 2019), viz; incentives and capacity-building; cross-sectoral cooperation; pre-emptive action; decision-making in the context of

resilience and uncertainty, and; environmental law and implementation. A number of these ‘levers’ are governance and implementation related and may be a valuable framing for aspects of the NPWS Review.

In addition, the European Commission has highlighted in its 2019 Environmental Implementation Review (EIR)¹, that Ireland has to: complete the Natura 2000 designation process for both terrestrial and marine environments; and, put in place clearly defined conservation objectives and the necessary conservation measures so that they may meet their objective of maintaining or restoring species and habitats of community interest to a favourable conservation status across their natural range.

The EPA notes that there is a significant role for the NPWS in addressing the challenges identified in the SOER2020 and the EU EIR2019. It is important that as part of the Review of the NPWS and specifically the task to “appraise of the current NPWS operational model, and to identify any issues, structural, resource-based or other, which need to be addressed in order to better equip the NPWS to meet its operational objectives”, that the Committee consider and evaluate how best to address the challenges identified.

General Matters of EPA Engagement with NPWS

The EPA, in carrying out its various functions collaborates and interacts with the NPWS across a number of environmental areas and for multiple reasons (e.g. Water Framework Directive, EU Nature Directives, research activities). These engagements are summarised in Table 1 below.

We note that an operational MOU exists between the NPWS and EPA and that this has functioned adequately. We recognise that following the Review there may be an opportunity for further engagement via this process. We also acknowledge the role NPWS are playing in relation to the closure and rehabilitation of former Bord na Mona peat harvesting sites, which are regulated by the EPA.

Enforcement collaboration would be further enhanced through active participation of NPWS in the National Enforcement Network (NIECE). In addition, a replacement NPWS nomination for the EPA led national Dumping at Sea advisory committee remains outstanding.

In recognising the skills and experiences required for nature protection and the complex legal landscape, we would ask that the NPWS develop a direct outreach and awareness service (education and training) to assist maintain knowledge and competency within partner Agencies and local authorities responsible for aspects of nature protection and assessment.

¹ https://ec.europa.eu/environment/eir/pdf/report_ie_en.pdf

TABLE 1: Summary of EPA Engagements with NPWS

Nature of Engagement	Office	Description of Work (e.g.)
Regulatory	OES, OEE	AA; EIA; Licensing; Enforcement; Closure & Aftercare planning; Environmental Liability; statutory planning; statutory and ordinary consultee for regulatory processes
Committees	ORM, OEA, OES, OEE, ODG	Committees, Forums, Working Groups and National Implementation Committees (e.g. Water Framework Directive, National Peatlands Strategy, Ministerial Biodiversity Working Group, SEA and AA Forums, National Biodiversity Action Plan, CAP Strategic Plan); MOU operation and its Liaison Group; preparation of Guidance.
Research	OEA (OES, ORM, OEE)	Project proposals evaluation, steering, co-funding, and national Research Co-ordination; EU research projects liaison
Monitoring & Data	OEA, ORM	Information exchange; Hydrometrics (wetlands) data exchange; Protected Areas registers; species records (e.g. crayfish); water quality (for Habitats Directive); National Ecosystems Monitoring Network,
Assessment & Reporting	OEA	SOER, including providing regular updates to the Ireland's Environment portal; EEA EIONET; Water Framework Directive; Habitats Directive,
Consultee	ALL	NPWS are a regular organisational consultee for EPA where new policy or initiatives are being developed (EPA Strategy, EPA Research Strategy, SEA and enforcement guidance, etc)
Other	OEA	Shared equipment & sites for monitoring

Nature Governance in Ireland

In the majority of cases the EPA, in protecting the 'environment', also acts to protect nature through managing emissions to Air (including Noise and odour), Water, Land, and radiological, and as noted above, the EPA role in protecting Ireland's environment brings it in regular contact with the NPWS.

The national governance landscape for heritage assets is complex. The NPWS is but one agency/body that has a specified nature protection, conservation and wildlife education role, with others including Inland Fisheries, the Heritage Council, the Marine Institute, Waterways Ireland, National Museum of Ireland, OPW, Local Authorities and the Dept Agriculture Food and the Marine. The EPA through discharge of its environmental protection functions has a supporting role too. There are also very large NGOs such as Birdwatch Ireland which is an independent conservation organisation working on species and habitat creation, research, education and advocacy, and who also operate their own network of nature reserves. Lastly, it is worth noting that there is a very significant citizen interest, and 'citizen science' engagement, in our natural environment that has to be reflected in any 'governance' discussion. Such citizens, acting as individuals, communities or landowners, are hugely important in delivering

and assuring local nature protection initiatives. There is currently no national forum for coordination of respective functions, knowledge needs, and activities.

We believe that an important aspect of the Review will be to map and assess this complex governance landscape and make recommendations for an NPWS led national knowledge exchange and collaborative forum for nature protection and conservation bodies.

Research

The EPA operates a statutorily mandated environmental research programme that has a broad scope covering the delivery of policy and implementation relevant research across climate, water, air quality, radiation, chemicals, waste, circular economy, behaviour change, environment & health, and emissions impact. There are intersections and co-benefits for nature protection aspects, however we recognise that this is not sufficient as regards focus or investment.

There is no one body in Ireland leading-out on coordinating or championing biodiversity and ecosystem research. NPWS should lead a national research strategy for ecosystems and biodiversity and secure multi-annual funding to deliver on strategic (including partnership co-funding) needs.

National Biodiversity Data Centre

The National Biodiversity Data Centre (NBDC) is the national centre for the collection, collation, management, analysis and dissemination of data on Ireland's biological diversity. In order to conserve Ireland's biodiversity it is necessary to document what biodiversity we have, understand how it is distributed across the island of Ireland and its marine waters, track how it is changing over time, and communicate the importance of conserving biodiversity. Addressing these knowledge gaps and building the scientific evidence base to help its conservation is central to the work of the NBDC.

Education, monitoring and citizen science initiatives are vital steps in protecting the environment and biodiversity. To promote more proactive and widespread engagement we need to continue to systematically survey habitats and species, track threats from invasive species and develop collaborative projects between scientists, farming sectors and the public. These are core roles currently fulfilled by the National Biodiversity Data Centre.

The skills, knowledge and longitudinal biodiversity data residing in the NBDC are a critical national asset and this needs to be secured into the long term as part of the state's permanent nature governance infrastructure. The current periodically 'procured' private enterprise model (Compass Infomatics) for such a core national asset is too precarious to assure the essential continuity. We strongly recommend the full integration of the National Biodiversity Data Centre into the scientific enterprise of the NPWS.

Regulatory Processes

EPA staff in the licensing and enforcement areas find that access to actionable information from NPWS is weak (e.g. habitat maps for Natura sites, critical loads and critical levels specified for protected sites), and when submissions are received from NPWS they can often be very generic and thus lacking any site, or action, specificity necessary for the regulatory (assessment and conditioning) processes. There are also challenges in getting NPWS input on regulatory matters not associated with designated protection sites e.g. Environmental Liability Directive incidents which impact on features outside designated sites. It would be extremely beneficial if the NPWS provided nature protection assessment and input to decision making processes in national regulatory processes such as operated by the EPA (e.g. facility and activity consents, incidents). In addition, in order to support environmental decision making, the EPA would ask that the NPWS makes available in web/GIS format maps and searchable resources and the key emissions assessment support information on site-specific critical loads and critical levels for protected areas.

Water Framework Directive (WFD)

There is an intimate relationship between many national SACs and SPAs and water quality – i.e. there is a vital water dependency. There is an opportunity for strengthened and formalised engagement between the NPWS and EPA with regard to the WFD and that this could include input into the characterisation of pressures, input to developing monitoring protocols, and improved harmonisation in the approach to monitoring. Given the dependency of many national SACs and SPAs on water quality and quantity, it would be important for NPWS to become an active member of the National Water Framework Directive Governance structures.

Land Cover and Data Sharing

The NPWS chair the national landcover mapping steering committee, which is an important function to provide independent oversight to the OSI national landcover mapping project. Active management of this project including regular meetings of the steering committee and progress reports from the OSI are key to successful delivery for all stakeholders.

Sustainable land-use means doing the “right thing in the right place”. Ireland is not sustainably managing our land-use: some land-use types and associated land management activities are having negative impacts on trends in water quality, biodiversity, greenhouse gas emissions and air quality. Using and valuing land according to the multiple benefits sustainable land-use provides to human health and the environment can support sectoral development while at the same time provide for greater protection of our environment and better social and economic outcomes. NPWS hold important data relevant to the Water Framework Directive register of protected areas and Article 17 habitats directive reports. It can be difficult to get access to NPWS data. Completion and availability of site-specific data on Special Areas of Conservation

and more granular habitat maps would be of enormous help not only to landcover mapping but also to catchment management processes.

Dedicated NPWS resources to facilitate data sharing and to deliver site-specific data for protected habitats would greatly assist the landcover mapping activity (as well as EPA regulatory and Water Framework Directive activities), which in turn would facilitate better assessment of local and regional nature protection issues.

In Conclusion

The EPA recognises the critical role that the NPWS plays in nature conservation and biodiversity protection and we look forward to its continued engagement with EPA in the protection of the environment in Ireland. We welcome this Review and hope that you find our submission of assistance in your work and we would be happy to meet with you to discuss any aspect of this in more detail.

Yours sincerely



Laura Burke

Director General