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4th National Biodiversity Action Plan Consultation  
Biodiversity Policy, National Parks and Wildlife Service  
Department of Housing, Local Government and Heritage  
90 North King Street  
Dublin 7, D07

Our ref: EPAC-2422

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## **Re: Public Consultation on Ireland's 4th National Biodiversity Action Plan**

Dear Sir/Madam

The Environmental Protection Agency (EPA) welcomes the opportunity to comment on Ireland's 4th National Biodiversity Action Plan as part of the public consultation process by the Department of Housing, Local Government and Heritage. We have completed the online survey provided on gov.ie and include the EPA's response below, beginning with some general points for consideration and then moving into more specific observations on the Draft Plan.

### **Summary documents and Implementation Plan**

In finalising the Plan consideration should be given to the preparation of:

- A summary version of the Plan for policy makers, and,
- A summary document for members of the public

In addition, consideration should be given to the preparation of a companion Implementation Plan to facilitate tracking of the Actions set out in the Plan. This could contribute to the development of the proposed robust Monitoring and Evaluation Framework.

### **Key considerations in the development of the Plan**

On achieving greater coherence between biodiversity policy and other policy areas, consideration should be given to including a figure or a series of figures showing links between the Plan and other sectoral plans such as WFD RBMP. A schematic showing the hierarchy of biodiversity-related plans should also be included.

### **Second National Biodiversity Conference**

The key relevant findings of the report of the Second National Biodiversity Conference should be reflected in the final Plan.

## **Objective 1 - Adopt a whole of Government, whole of society approach to biodiversity**

The title page and the Foreword(s) to the Plan should reflect the commitment to all of government ownership of the Plan.

The title of the Plan should reflect the duration of the Plan i.e., 2023-2028.

The statutory basis of the Plan should be confirmed prior to its finalisation.

There would be merits in including a map of the territory which the Plan covers including the marine area in the introduction. There may also be merits in including a map(s) of SACs, SPAs, MPAs, NHAs, National Parks and Biosphere Reserves.

Consider establishing an all-of-Government Implementation Group with membership from the National Biodiversity Forum, Biodiversity Working Group, Citizens Assembly on Biodiversity Loss and relevant Government Departments.

The commitment to prepare an annual progress report on implementation of the Plan's actions is welcome. The presentation of this progress report to the Cabinet Committee on the Environment and Climate Change is a positive development.

The commitment to having a Biodiversity officer in each local authority is welcome as is the requirement for each local authority to have a Biodiversity Action Plan in place by the end of 2026. These Plans should be screened with respect to the requirements for SEA and Appropriate Assessment. Consideration could also be given to having a Biodiversity officer role in each of the three Regional Assemblies.

As the Introduction reflects themes explored in more detail in the report, the EPA's State of Environment Report, [Ireland's Environment: An Integrated Assessment 2020](#), could be cited in the Introduction (page 3) and included in the Reference section.

### **Outcome 1C: The root causes and key drivers of biodiversity loss are tackled by each responsible department**

Under Outcome 1C, consider having a specific action around using outputs and data from environment and pollution monitoring programmes for the protection of protected habitats and sensitive ecosystems, such as the National Ecosystems Monitoring Programme (others could be listed as well such as WFD, MSFD etc.). These environmental monitoring programmes could also be relevant for input to **Action 2A2**: publish detailed site-specific conservation objectives for all SACs and SPAs.

Consider a specific action around further collaboration between DHPLG (i.e., NPWS) and other organisations on national environmental monitoring programmes that are relevant to habitat protection. For example, there is an MoU between EPA and NPWS on collaboration to set up the National Ecosystems Monitoring Network (NEMN).

## **Objective 2 - Meet urgent conservation and restoration needs**

### **Outcome 2B: Biodiversity and ecosystem services in the wider countryside are conserved**

Under Action 2B4 on measures to reduce pesticide use, this could also have an indicator to reduce impact on water quality and exceedances. It could also link to an action around a campaign for the disposal of old pesticides that might be a risk to wildlife.

**Outcome 2E: a National Restoration Plan is in place to meet EU Biodiversity Strategy 2030 nature restoration targets.**

There is merit in including a specific Target in relation to the preparation of a National Restoration Plan in accordance with the Nature Restoration Regulations. A target to have a Restoration Plan in place by the end of 2025 would seem reasonable and achievable. The Restoration Plan should be screened with respect to the requirements for Strategic Environmental Assessment and Appropriate Assessment.

**Objective 3 - Secure nature's contribution to people**

**Outcome 3D: Planning and development will facilitate and secure biodiversity's contribution to people.**

The Target to produce Guidance on best practice for biodiversity, green infrastructure and nature-based solutions in planning and development should also be captured as an Indicator. This could be integrated with the proposed "*SEA and Biodiversity, Flora and Fauna Guidance*" to be prepared by DHLGH under the SEA Action Plan 2021-2025.

**Objective 4 - Embed Biodiversity at the heart of climate action**

**Outcome 4B: Climate change adaptation and mitigation measures contribute where practical to biodiversity and ecosystem conservation.**

There would be merits in including a Target and related Action/Indicator associated with the implementation of the Peatlands and People LIFE project, as captured in the Climate Action Plan 2021- Action No. 22.

**Objective 5 - Enhance the evidence base for action on biodiversity.**

**Outcome 5B: Data relevant to biodiversity and ecosystems, including conservation needs, is widely accessible and standardised.**

We recommend changing Action 5B2 as follows in italics. "EPA will *explore the feasibility* of an integrated site and monitoring data solution to make data available relating to industrial consents and licences and associated monitoring data collected pre and post projects". It is considered this is a significant task and merits further discussion with the EPA to agree the scope and nature of the action. It will most likely involve a research project. There may be opportunities to explore a specific sector and pilot geographical area, which would be more achievable within the timescale specified, building on EPA initiatives in this area. In this context, the Target date for this action should be amended to 2027.

**Outcome 5C - Long-term monitoring programmes are in place to guide conservation and restoration goals.**

Action 5C1 states: 'A site-based monitoring programme to monitor changes in biodiversity over time will be developed'. More information would be useful here, as it is unclear whether this is a new programme or will incorporate existing relevant programmes such as under Article 17, WFD, NEMN etc. Also, there is no time frame or owner listed in the Draft Plan.

Action 5C2 refers to 'Collaboration across Government to support biodiversity monitoring will be enhanced, in particular to support the biodiversity-related reporting requirements for the WFD, MSFD, NECD, EU Biodiversity Strategy and the CBD'. This is a very broad action. Consider having one overarching action on collaboration across Government then subdivide the actions to cover the different monitoring programmes - for example NEMN is covered under the NECD that is mentioned.

Under Action 5C2, include reference to the Nature Restoration Regulation also.

Additional Actions could be included alongside the National Land Cover Map in relation to Habitat and Ecosystem Services mapping.

Consider moving Action 5C9, on priority invasive species, to under Outcome 2G relating to the control and management of invasive alien species.

Under the broad heading of Outcome 5, consider including an action to cover chemicals. It could be related to collaboration, enforcement of regulations, data sharing and monitoring of persistent organic pollutants, pesticides and other specific hazardous chemicals that are of interest for biodiversity protection, including data on monitoring in biota/wildlife and restrictions on certain chemicals. Consider establishing further collaboration between biodiversity and biota chemical monitoring and the descriptor on contaminants under MSFD and chemicals monitoring under the WFD. The enforcement aspect around chemicals could also be relevant to **Action 1E3** around resourcing to enforce environmental and wildlife legislation.

#### **Outcome 5D: Ireland has prepared national assessments of ecosystem services and natural capital.**

Actions 5D1 and 5D3 have different target dates for achieving the first national assessment of ecosystem services. The target date associated with 5D3 of 2027 would appear to be more achievable.

#### **Outcome 5E: Biodiversity is mainstreamed across relevant research disciplines.**

There may be merits in setting up a portal for biodiversity related EU LIFE projects, if not already available.

### **Objective 6 - Strengthen Ireland's contribution to international biodiversity initiatives**

#### **Outcome 6A: Science, policy and action on biodiversity conservation and restoration is effectively coordinated in an all-island approach.**

Action 6A2 – Ireland has adopted an all-island approach to invasive species by 2025 – this could also be reflected under Outcome 2G in relation to Invasive Alien Species.

Action 6B1 states that: 'Ireland will enhance its engagement with EU and international biodiversity initiatives and research, e.g., EU Biodiversity Platform, CBD, OSPAR, RAMSAR and IPBES'. We recommend including a reference to EEA Eionet (Biodiversity and Ecosystems Groups). NPWS and EPA are active participants in these newly reformed European network groups.

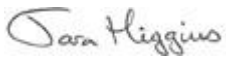
## **APPENDIX – SEA and AA Screening**

The SEA screening for the Plan should, as appropriate, be undertaken in consultation with the relevant statutory environmental authorities. Where required, the SEA process should commence as early as possible in the Plan-making process.

The Table of all actions in the 4<sup>th</sup> NBAP should be referred to as Appendix 2.

The EPA looks forward to the adoption of **Ireland's 4th National Biodiversity Action Plan** and to working together with the Department, a strengthened NPWS, other partners and stakeholders towards its full implementation leading to a reduction of human-induced pressures on the environment and, ultimately, the restoration and conservation of nature in Ireland.

Yours sincerely



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Office of Evidence and Assessment