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Nollaig 2023

Joint Committee on Environment and Climate Action

Report on the examination of recommendations
of the Citizens' Assembly report on biodiversity loss

December 2023

Membership of the Joint Committee on Environment and Climate Action



Richard Bruton TD
Fine Gael



Martin Kenny TD
Sinn Féin



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Green Party



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Fianna Fáil



Paul Murphy TD
Solidarity-People Before Profit



Jennifer Whitmore TD
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Senator Lynn Boylan
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Senator Timmy Dooley
Fianna Fáil



Senator Alice-Mary Higgins
Independent



Senator John McGahon
Fine Gael



Senator Pauline O'Reilly
Green Party

Cathaoirleach's Foreword



The Citizens' Assembly on Biodiversity Loss in Ireland published its Report in March 2023. This Report was referred to the Joint Committee on Environment and Climate Action on 20 June 2023 for consideration with a report back date of 31 December 2023. In considering this Report the Committee has engaged extensively with relevant stakeholders. The Joint Committees' Report contains 86 recommendations which the Committee feel are vital to ensure that the biodiversity crisis in Ireland is addressed in a meaningful way. Given the time available the Committee focussed on the recommendations where it felt that there were gaps in implementation.

I would like to express my appreciation to all the witnesses for their valuable contributions and to the members of the Committee for their dedicated work in this collaborative process. I would also like to thank those groups who took the time to inform the Committee by written submissions. I would encourage everyone to take the time to read this report and the recommendations therein.

A handwritten signature in black ink that reads "Brian Leddin".

Brian Leddin T.D.

Chairman

Joint Committee on Environment and Climate Action

December 2023

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Stakeholder Engagements

The Committee held a series of engagements with stakeholders which provided evidence from a broad perspective. These engagements took place as follows:

Date	Topic	Witness
19 September 2023	Overview of the recommendations of the Citizens' Assembly report on Biodiversity Report	<p>Dr Aoibhinn Ní Shúilleabháin, Chair of the Citizens' Assembly</p> <p>Professor Tas Crowe, University College Dublin</p> <p>Dr Mícheál Ó Cinnéide, Member of Expert Advisory Group</p> <p>Dr James Moran, Atlantic Technical University</p> <p>Anne Jones, Member of Assembly</p> <p>Patrick Joyce, Member of Assembly</p>
17 October 2023	Rights of nature and environmental law	<p>Professor Áine Ryall</p> <p>Mari Margil, CDER</p> <p>Thomas Linzey, CDER</p> <p>Dr Peter Doran</p> <p>Dr Mary Dobbs, Maynooth University</p> <p>Dr Orla Kelleher, Maynooth University</p>
24 October 2023	Funding nature restoration	<p>Dr Tadhg O'Mahony</p> <p>Professor Martha O'Hagan Luff, Associate Professor, Trinity College Dublin</p>

Dr Emer Ní Dhúill, Natura Capital
Ireland

David Owens, Department of
Finance

[07 November](#) Land Use and Water
[2023](#)

**Environmental Protection
Agency, Evidence &
Assessment**

Dr Eimear Cotter, Director

Dr Jenny Deakin, Senior Scientist

Mary Gurrie, Programme
Manager

University College Dublin

Professor Mark Scott

**Department of Agriculture,
Food and the Marine**

Bill Callanan, Chief Inspector

John Muldowney, Principal
Officer

Dr Michelle Kearney, Principal
Officer

Dr Pamela Boyle, Agricultural
Inspector

Seamus Dunne, Senior Inspector

**Department of Housing Local
Government and Heritage**

Colin Byrne, Senior Water
Advisor

Fintan Towey, Assistant
Secretary, Water Division

Dr Marie Archbold, Water Adviser

[14 November](#)
[2023](#)

National Biodiversity Action
Plan and protected sites

**National Parks and Wildlife
Services**

Niall Ó'Donnchú, Assistant
Secretary, Heritage Division

Andy Bleasdale, Principal Officer,

Deirdre Lynn, Wildlife Inspector

Claire Cooper, Assistant Principal
Officer

[21 November](#)
[2023](#)

Mandates and enforcement

Mr Francis O'Donnell, Chief
Executive Officer, Inland
Fisheries Ireland

Dr Micheál Ó Cinnéide

Discussion with the Children
and Young People's
Assembly on Biodiversity
Loss

Representatives from the
Assembly

Introduction

1. The Citizens' Assembly on Biodiversity Loss was convened to examine and consider how the State can improve its response to the crisis of biodiversity loss. The Assembly comprised of 100 members including the Chairperson, Dr Aoibhinn Ní Shúilleabháin, and 99 members of the public. The Assembly published its report and recommendations in March 2023 which was referred by the Dáil to the Joint Committee on Environment and Climate Action on 20 June 2023 for consideration with a report back date of 31 December 2023.
2. In considering the Assembly's report, the Committee noted that a number of recommendations are currently in the process of being partially or wholly implemented. As such the Committee agreed to undertake its consideration of the report by examining gaps in implementation. This resulted in public engagements around the following topics:
 - Rights of nature and environmental law
 - Funding nature restoration
 - Land use and water
 - National Biodiversity Action Plan and protected sites

Given the time-limited nature of the body of work, the Committee also requested a number of written submissions to inform its work. Submissions were received from a number of stakeholders and can be found at Appendix 3 of this report. The Committee's examination of these topics is set out in the body of this report followed by recommendations based on the evidence gathered.

3. Dr Aoibhinn Ní Shúilleabháin, Chair of the Citizens' Assembly, outlined the need for urgent action to address the stark issue of biodiversity loss in Ireland. The Committee noted that almost 30% of semi-natural grasslands have disappeared, with less than half of the marine environment in a healthy state and almost 50% of freshwater systems in an unsatisfactory condition. Many plant, animal and bird species are in danger of extinction. 85% of those

habitats in Ireland that have been assessed are in unfavourable conservation status.

4. Dr Ní Shuilleabháin highlighted the Assembly's view that successive governments had not prioritised the prevention of biodiversity loss with a lack of information and understanding of biodiversity as a key factor in that. The Committee noted that a key recommendation of the Citizens' Assembly was for biodiversity to be given greater priority and specific focus through targeted action across Departments.
5. On 21 November 2023, the Committee held a public engagement with six young members of Youth Citizens' Assembly. The Committee noted the 58 recommendations of the Youth Citizens' Assembly final report on biodiversity loss. The Committee noted the view that biodiversity loss and climate change must be addressed for the benefit of future generations and that children and young peoples' views must be taken into account in the implementation of measures to restore biodiversity.
6. The Committee noted the role for children and young people in being a voice that engages with adults to reduce scepticism around biodiversity and the knowledge that children have in relation to climate change and their future. The Committee also noted that responsibility for engaging society with the issue of biodiversity loss should not be the sole responsibility of children and that adults – in particular those with power in society -- have responsibility for protecting and promoting biodiversity. The Committee noted the view that while there is a narrative of "climate doom" in society, it is important to acknowledge and focus on the small victories that make a difference and give hope for the future. The Committee agreed that biodiversity is a shared responsibility and a collaborative effort on a global level is needed to address it.
7. The Committee acknowledged the Irish Schools Sustainability Network and agreed that engagement with nature should be encouraged in all schools to enhance biodiversity learning and develop attitudes towards restoration. The

Committee noted the Youth Assembly's call to action No.2 which states that biodiversity education should be provided for people of all ages outside of schools.

Environmental law and enforcement

8. Dr Áine Ryall highlighted that a recurring theme throughout the work of the Citizens' Assembly was that:

“the State has comprehensively failed to adequately fund, implement and enforce existing national legislation, national policies, EU biodiversity-related laws and directives related to biodiversity.”

The Committee noted that there is an extensive range of environmental laws in place in Ireland, with many designed to protect nature and biodiversity. However, Dr Ryall stated that a significant lack of prioritisation, coherence and resourcing of public authorities has created a fragmented approach to environmental governance. The Committee noted the need for a fundamental change in approach to environmental governance and that implementation and enforcement of existing laws must be a priority.

9. Members acknowledged the key roles of local communities, local authorities, NGOs and the National Parks and Wildlife Service in this implementation. Dr Ó Cinnéide highlighted that a key action for supporting the restoration of biodiversity is to put the national biodiversity action plan on a statutory footing so as to ensure future plans have greater resources to implement and enforce them. Dr Deirdre Lynn, NPWS outlined that an action of the forthcoming National Biodiversity Action Plan will provide for this through the Wildlife (Amendment) Act 2023 whereby every public body will be obliged to have regard to the Plan.
10. The Committee expressed concern that there is no specific wildlife unit within the National Parks and Wildlife Service to address wildlife crime and enforce environmental law. While Mr Niall Ó Donnchú, NPWS stated that everyone in

the NPWS is responsible for addressing wildlife crime, it was widely acknowledged that further action should be taken to strengthen the levels of enforcement across all relevant bodies.

11. Dr Ó Cinnéide highlighted that better collaboration between agencies with specialised and dedicated teams would also enhance enforcement. The Committee noted that active participation of the NPWS in the national enforcement network could further advance this collaboration and that a functioning enforcement unit within the NPWS would strengthen this.
12. Mr Francis O'Donnell, IFI, highlighted that given the crisis facing Ireland, there must be a discussion on sharing and authorising enforcement powers across agencies to increase the number of officers on the ground. The Committee noted the view that representatives from any environmental agency that detects an environmental offence while operating in their catchment areas should be able to prosecute it.
13. Stakeholders agreed that there is a growing consensus internationally for recognising the right to a healthy environment. The Committee noted in 2022, the United Nations recognised that a clean, healthy, and sustainable environment is a human right. The CDER outlined that national rights of nature laws have been enacted in Ecuador, Bolivia, Panama, Spain and Uganda, while local laws have been adopted in the U.S., Canada and Brazil. The Committee noted that courts in Colombia, Bangladesh and India have recognised that rivers and other ecosystems have rights.
14. Dr Ní Shúilleabháin highlighted the international precedent for an environmental court at Circuit and District Court levels as per the recommendation of the Assembly's report. Dr Ryall stated that specialist environmental courts are well established in several other jurisdictions though Members noted that there is no "one-size-fits-all" approach and careful design that is specific to Ireland would be essential. The Committee noted that while specialisation can bring significant benefits, this is only the case if the design

and implementation of the specialist model fits into existing structures appropriately.

15. Dr Orla Kelleher highlighted that specialised environmental courts at District and Circuit court level would result in improved enforcement, enhanced expertise, greater efficiency and reduced costs. However, Dr Ryall also emphasised the importance of access to justice and highlighted that access to the courts must be affordable for all citizens in order to be effective. Without access to justice, there is no remedy available to hold the State to account where there are failures and therefore no incentive for the State to act appropriately and enforce the law.

Rights of nature and the right to a clean, healthy, sustainable environment

11. The Committee noted the Assembly's recommendation that Ireland adopt the human right to a clean, healthy and sustainable environment and the recommendation that the legal rights of nature be recognised. The Committee noted that nature is protected in many jurisdictions around the world and acknowledged the increased debate and conversations taking place across Europe and internationally around the rights of nature and the human right to a clean, healthy and sustainable environment.

12. The Committee noted that in 2008, Ecuador enshrined the rights of nature in its constitution and noted the Assembly's recommendation that a referendum be held to amend Ireland's Constitution to protect biodiversity and to include the substantive human right to a healthy environment and the procedural environmental rights. Dr Ryall outlined that:

“the procedural environmental rights include the right to information on the environment, the right to participate in environmental decision-making and, the right to access to justice in environmental matters”.

13. Ms Mari Margil outlined that Ecuador has the most robust enforcement and implementation because the rights of nature have been enshrined within its constitution for 15 years. The Committee noted the practical benefits for nature as a result of these rights whereby mining permits have been adapted to ensure fragile ecosystems and habitats are not affected and that government decisions uphold the rights of nature. Thomas Linzey highlighted that the law has been most effective with regard to cases brought by NGOs seeking to stop permit issuances before Ecuador's constitutional court.

14. The Committee acknowledged the stakeholder consensus that both the substantive human right and the procedural environmental right go hand in hand and that in order to effectively achieve the benefits associated, a complementary approach must be taken. Dr Kelleher highlighted that potential concerns with environmental rights include weighting those rights above other fundamental rights or creating a toll that may be abused. The Committee noted that while these concerns are valid, it should be acknowledged that all rights must be balanced and existing rights will not be removed with the addition of environmental rights.

15. Dr Ryall highlighted that enshrining something in the constitution sends a powerful message across society that can impact political will:

“What I would say is that by constitutionalising something it has to be seen in tandem with the existing body of law. The two go together. It is not that we can see the constitutional right as being separate. With the constitutional right well-designed and well-implemented domestic legislation, we really can bring about change. There is no doubt in my mind that the Constitution dimension has added value. It demonstrates that society takes the environment seriously.”

16. While the Committee expressed concern that the complexities of a potential referendum question would not be adequately thrashed out with the average

member of the public as it was at the Citizens' Assembly, Dr Dobbs emphasised that the Assembly's recommendations around education and public awareness should be frontloaded and embedded in advance of any referendum to prevent misinformation and extreme viewpoints from taking hold. Dr Ó Cinnéide emphasised the potential for a referendum to also increase public debate and education around biodiversity issues.

17. While it was acknowledged that nature and environmental rights are complementary, several stakeholders agreed that two separate questions should be put to the public. Dr Kelleher emphasised that the wording of any referendum would be key to providing a balance of rights and ensuring that what is designed for Ireland is appropriate to the Irish constitutional context. This would ensure that the constitutional amendment would be meaningful and enforceable and that it complements the existing body of environmental law in Ireland.
18. Dr Dobbs and Dr Kelleher further emphasised the importance of involving a group of experts in the design and drafting of the question who understand Ireland's constitutional context and the existing international examples and who would provide a broad expertise to inform the development of such wording. While some Members expressed concern that two questions could result in more human rights but no rights of nature, Dr Dobbs highlighted that one question could run the risk of ending up with no rights at all. Dr Ryall emphasised that whether a referendum should contain one or two questions would depend entirely on the precise wording and how far it goes and what it is trying to achieve.
19. The Committee noted the stakeholder view that the rights of nature should also move into international agreements and instruments. Ms Margil highlighted that debates are happening at an international level around the integration of the rights of nature and the human right to a healthy environment in international agreements. Dr Dobbs highlighted that while it is important to look at developments in the international sphere, Ireland should

be supportive of legislation such as the Nature Restoration Law and drive development at an EU level.

Funding Nature Restoration

20. Stakeholders outlined the overwhelming evidence of biodiversity loss in Ireland and stated that rapid action and significant investment would be necessary to protect and restore nature for future generations. The Committee noted that to achieve this, landowners must be incentivised and rewarded to provide the benefits that will protect and restore biodiversity in Ireland. Dr Martha O'Hagan-Luff highlighted that:

“Nature provides us with multiple benefits, or ecosystem services, which we need to assess and value. We invest in and produce detailed accounts of our produced capital, such as our roads and buildings, and our human capital, including our health knowledge and skills. However, we have long underinvested in and undervalued our natural capital.”

21. The Committee noted that there is a lack of sufficient data and mapping of ecosystems in Ireland. Dr Emer Ní Dhúill stated the need for greater investment in mapping to better understand the extent and condition of our ecosystems so that landowners can be accurately rewarded for restoration and protection of nature. The Committee noted that the CSO has set up an environmental account division and that EU regulations for developing ecosystem accounts are forthcoming for all EU Member States. Dr O'Mahony agreed that a land use map is vital for on-the-ground data to best understand the current habitats and species and the condition of these aspects of ecosystems while also providing for better accounting tools.

22. Dr Ní Dhúill highlighted the need to develop an understanding of the extent and condition of our ecosystems and what they can provide us with if protected and restored to inform any rewards or incentives schemes. However, the Committee expressed concern that given the lack of data

currently available, implementing a model for rewarding biodiversity may be significantly delayed. Some Members questioned whether an immediate rewards scheme based on broad figures could be implemented with the State paying out for any errors in the future.

23. Stakeholders agreed that given the extent of biodiversity loss, it is essential to take action where possible now. Dr O'Hagan-Luff stated that there are a number of ways to move forward without waiting for additional research and mapping:

“We need to get on with it and soon. We do not know everything but there are certainly some very straightforward things where we know what good looks like. Where we have gaps in our knowledge, that is fair enough, but we know we need more trees. Only 2% of our land is covered by native woods. That is way behind the European average so that is very straightforward. We do not need to wait on that. We know when planted in the right place, native trees are good for biodiversity, water filtration etc., so we do not need to wait. We know that is good and that we should invest in it. We know rewetting bogs is very positive for carbon sequestration and native woodlands are very good for biodiversity.”

The Committee acknowledged that mistakes may be made while developing the way forward for “ecosystem accounts” and reward schemes but noted the view that the arts, health and education are funded by the Government without a clear measure for the return on investment because it is recognised that such things are for the public good.

24. Dr O'Mahony emphasised that the economic benefits of valuing ecosystems are clear, and that a strategic approach to transforming our system of subsidies to one that is more nature-positive is needed and that this should include both a short-term and long-term approach. The Committee noted that

this would allow for the implementation of measures in areas where there is more data and better understanding while still gathering further data and conducting greater research for those areas where there is less clarity.

25. Dr O'Hagan-Luff highlighted that nature's value has long been about financial return but needs to be viewed more broadly and in relation to what nature can provide for society. The Committee noted a European Commission report stating that 15% of the value of forestry is timber supplies with the remaining 85% coming from ecosystem services and agreed that the latter values must be prioritised in any future rewards scheme.
26. Dr O'Hagan-Luff stated that businesses need to be supported in order to evolve their business models to better manage biodiversity while greater investment in research for biodiversity and nature restoration would ensure relevant information is circulated to landowners, businesses, government agencies and the public. The Committee noted the need for better investment in public/government-owned lands and agreed that funding would be required both from the public sector and private sector as well as further investment from citizens to provide for the necessary changes.
27. Stakeholders highlighted that due to the Corporate Sustainability Reporting Directive, CSRD, businesses will need to report their impact and dependence on biodiversity and change how they operate to provide actions for prevention and restoration. The Committee noted the view that nature should be protected as heritage buildings are protected and that this type of value should be placed and recognised. Dr O'Hagan-Luff stated that businesses should not be permitted to contribute financially in order to conduct business as usual and damage natural sites as has been done in the past.
28. Stakeholders highlighted the need to look to nature to provide nature-based solutions more cost-effectively. The Committee noted that the Arterial Drainage Act 1945 conflicts with attempted flood prevention works where providing for nature restoration upstream that would address downstream flooding is more challenging than pouring concrete on a river, a less cost-

effective measure. The Committee agreed that when considering the benefits, the environmental benefits and benefits to the community including long-term benefits should be taken into account.

29. The Committee expressed concern that current cost-benefit analyses did not capture all values when assessing how public money is invested, particularly in relation to measures relating to the environment. Stakeholders agreed that any cost-benefit analysis that does not account for the wider benefits such as environmental or social benefits, is not going to provide or encourage a strategic approach to projects. Dr O'Hagan-Luff stated that:

“If a cost-benefit analysis is only done on financial means, it should not be used at all. It comes back to why we want to value nature, social gains or equity. Unless those factors are on the spreadsheet and balance sheet, it is pointless to use that methodology.”

Dr O'Mahony agreed that while they are a useful tool, there are limitations to cost-benefit analyses and that they often undervalue the long-term benefits and overvalue the impact of the capital investment.

30. Mr David Owens, Department of Finance, highlighted that the Department's role in supporting climate action has expanded in recent years to include advancing macroeconomic and fiscal analysis to better understand the effects of climate policies, introducing green budgeting analysis of the taxation system and supporting green bond issuance.

31. The Department of Public Expenditure, NDP Delivery, and Reform stated that Ireland committed to a series of progressive green budgeting reforms in Budget 2019 with the aim of embedding climate and environmental goals within the budgetary process. The Committee noted that as part of this, the department reports on Climate Favourable expenditure on an annual basis.

32. The Committee noted the EU taxonomy for sustainable activities, a classification system that assesses whether specific economic activities are

environmentally sustainable. Mr Owens outlined the Department's engagement with the taxonomy in guiding and encouraging investors to identify and channel money towards green investments. The Committee noted that investment in taxonomy-aligned activities is voluntary but acknowledged the influential role that taxonomy plays in moving investment towards more carbon-neutral activities.

33. Mr Owens stated that as *"taxonomy alignment reporting becomes embedded in the private sector, it can be expected that it will also become increasingly important for the public sector."* The Department of Public Expenditure, NDP Delivery, and Reform stated that the green budgeting tagging process is being revised for the publication of the REV in December 2023, and aims to include the identification of favourable and potentially unfavourable expenditure in line with the EU Taxonomy for sustainable activities. The Committee noted that responsibility for the implementation of policies and measures would remain with the relevant department.

34. The Committee noted that two new funds were announced in Budget 2024, the Future Ireland Fund and the Infrastructure, Climate and Nature Fund, ICNF. Mr Owens highlighted that both funds represent an important development in terms of allocating funding for biodiversity and nature initiatives. Members noted that the Future Ireland Fund will be maintained in the longer term and will be used to support Government expenditure for future generations while the ICNF will provide resources in the event of a future downturn to support capital expenditure through the cycle.

35. The Committee noted that the ICNF will support climate initiatives for the medium and longer term. The Department of Public Expenditure, NDP Delivery and Reform stated that a second avenue of access to the fund is proposed to assist with the transition to climate neutrality. The Committee noted that proposal provides that up to 22.5% of the balance of the ICNF may be drawn down to support climate and nature related capital projects in any year from 2026, to a maximum of €3.5 billion by 2030.

36. The Committee noted the proportion of available capital expenditure for Budget 2024 including additional funds made available from windfall exchequer receipts. While Members expressed concern that funding was not being utilised due to capacity constraints in the economy, the DPENDPR highlighted that funding will be targeted at projects that are ready for development.

37. Mr Owens also highlighted the role of the National Treasury Management Agency, NTMA in contributing to the funding of biodiversity:

“The NTMA has issued Irish sovereign green bonds, ISGBs to the value of more than €10 billion, with the proceeds allocated against eligible green projects. The Ireland Strategic Investment Fund, ISIF, is also supporting biodiversity with ISIF’s impact investment strategy including the themes of investments, climate, scaling indigenous business and food and agriculture.”

The Committee noted the significant appetite for green bonds from investors who feel they can rely on the State. Mr Owens stated that a detailed allocation report for green bond proceeds is published annually and the Committee noted that some funds are allocated to nature restoration and peatland restoration from green bonds.

38. The Committee noted that Ireland’s taxation regime includes a suite of environmental elements that support climate action, including carbon tax. Mr Owens stated that the Department of Finance recognises the role the taxation system plays in climate action with fiscal measures being a prominent tool in incentivising a move to a more carbon-neutral economy, thereby benefiting biodiversity. However, Mr Owens emphasised that field expertise is required to ascertain the specific impacts and benefits of such policy measures on biodiversity.

39. The Committee expressed concern that while there are many policy measures and funding streams in place that may have knock-on benefits for

biodiversity despite not directly targeting it, such measures are not providing enough for biodiversity restoration. Mr Owens stated that the taxonomy covers adaptation, mitigation, biodiversity, the circular economy, waste and pollution, and water. The Committee noted that biodiversity is not fully defined in the taxonomy but is a recognised factor in it and the CSRD.

40. The Committee noted that the National Biodiversity Plan and the green bond proceeds allocation do not come under the taxonomy. Mr Owens stated that it is likely investors will demand taxonomy-aligned investments in the future, though it must be acknowledged that it is a demanding standard and it will be difficult to find projects that fully align with the taxonomy:

“to give one example, if you are doing a construction project, 70% or more of all the spoil from the site must be fully recycled and go into the circular economy. It cannot become waste. That is difficult to achieve. Finding these projects will be the issue, and getting industry to create a pipeline of taxonomy-compliant projects will be part of what we need to see here.”

Land Use and Water

41. Dr O'Mahony highlighted that the current land use system has resulted in and continues to drive the biodiversity crisis in Ireland. The Committee noted that agriculture and forestry shape approximately two thirds of Ireland's total land area and that how this land is managed significantly impacts biodiversity.
42. The Department of Agriculture, Food and the Marine acknowledged the negative impact its sector has made on biodiversity loss and climate through a lack of or misinformed action but emphasised that greater collaboration across Government, more informed decisions as well as continuous monitoring will improve the sustainability of the sector.
43. Stakeholders stated that the current land use system prioritises food production for export markets and is not benefiting biodiversity, the public

good or the future of rural Ireland. The Committee noted a Teagasc survey outlining that 45-50% of farms in Ireland are economically vulnerable and acknowledged the need for a systemic change that will prioritise biodiversity and the livelihoods of farmers.

44. The Committee expressed concern that the EU Commission's recent reduction in the Nitrates Derogation from 250kg to 220kg per hectare was impacting the viability of smaller farms where a significant number of cows are being lost as a result of the derogation reduction. While some Members questioned whether more focus should be given to implementing compliance measures rather than the reduction of cattle in line with the derogation, the EPA stated that no one solution will fix the water quality issues associated with land use.
45. Dr Jenny Deakin stated that while 2000 farmers will be affected by the derogation reduction, there are 130,000 farmers across Ireland and water quality issues from agriculture are present across the country for various reasons. As such, the Committee noted that water quality issues will require measures throughout the whole sector, not solely those affected by the derogation.
46. Dr James Moran highlighted that the greatest challenge for agriculture and land use is about policy coherence where there are conflicting demands being made on landowners. The Committee noted the lack of clarity around land use policy for farmers and acknowledged that previous policy has resulted in the biodiversity loss seen today. Members agreed that policy and targets around land use should be made clear so that farmers have better certainty as to what is expected of them.
47. Mr Patrick Joyce, Citizens' Assembly, highlighted the need for agri-schemes to be more straightforward with greater engagement between the Department of Agriculture, Food and the Marine and farmers. The Committee agreed that community leadership and greater support to farmers at a local level would remove barriers to working to benefit the environment. Dr Moran emphasised

the need to ensure that payments to farmers, which are currently primarily provided for by the Common Agricultural Policy, clearly define what is to be delivered.

48. The Committee noted the successful models for payments for ecosystem services such as the Burren approach, BRIDE and the FarmPEAT project. While these have performed well at pilot level, the Committee noted that there are challenges to scaling these to a national level through the ACRES scheme. However, Dr Moran stated that although it is complex, there is capacity to do it in the next few years:

“The model is there. We are scaling it now to 20,000. If we scale that now, make it work on these 20,000, while at the same time have a parallel process of development to develop our IT support infrastructures, co-ordinating and feeding into a coherence policy, by the time the next CAP cycle rolls out in 2027 we will be ready to scale this cross the country. It requires that level of advanced thinking. The problem with the CAP is that we never plan it until we get our legislative framework from Brussels, which is always very late. We should perhaps plan in advance of that. We do not need to wait for Europe to make the framework to facilitate us to do this.”

49. The Department of Agriculture, Food and the Marine highlighted that 46,000 applicants were accepted in the first tranche of the ACRES programme, with the second tranche open to 50,000 farmers to participate. The Committee acknowledged the need for greater resources to ensure that results-based payment models are rolled out to all 134,000 farmers. Dr Ní Shúilleabháin highlighted that a land use map for Ireland will be essential for providing clarity on the most beneficial biodiversity markers for specific areas in order to ensure farmers are rewarded for ambitions and actions that benefit biodiversity.

50. Mr Brendan Dunford, Burrenbeo Trust highlighted that the structure of results-based payments must be carefully prepared to ensure there is meaningful incentive to landowners to improve biodiversity. Additionally, Mr Dunford stated that additional funding mechanisms beyond the CAP to support this work, both from the private and public sector. The Committee noted the view that in order to achieve real impact, more long-term support schemes (>10 years) for farmers and landowners should be considered.
51. The Committee expressed concern that while ACRES is expanding, few dairy and other more intensive farmers are participating in these schemes, with the majority being farmers operating at low intensity with more biodiverse farming practices. The Department stated that participation tends towards low-intensity farmers, it is available to all sectors including dairy. Mr Callanan highlighted that for more intensive farmers, targeted agricultural modernisation schemes, TAMS are supported as well as other eco schemes.
52. Mr Callanan outlined the provision of financial support to the Agricultural Sustainability Support and Advisory Programme (ASSAP) which works with local authorities Water Programme to advise farmers on preventing nutrient losses to water. The Committee noted that a new Water EIP project that will target 15,000 farmers is underway to promote best practice in nutrient management and address a gap in measures to protect and restore water quality.
53. The EPA outlined that Ireland's surface waters are under significant pressure from human activity, with only 54% of rivers, lakes, estuaries and coastal waters in a satisfactory condition. The Committee noted that only 36% of estuaries are in satisfactory ecological condition and acknowledged the challenge in bringing all waters back to better ecological health by 2027. Dr Eimear Cotter, EPA, highlighted that agriculture is one of the *“most significant pressures on our water quality, impacting 1000 water bodies due to nitrates and phosphorous coming off agricultural land into our waters.”*

54. The Committee noted that the main causes of damage to the quality of our waters are:

- run-off of nutrients, sediment and pesticides from agricultural lands, farmyards and forestry operations
- activities such as land drainage (hydromorphology), navigational dredging, and the presence of barriers such as dams, weirs or culverts in water courses
- discharges of poorly treated sewage from urban waste-water treatment plants, domestic treatment systems and storm water overflows

The EPA highlighted that full implementation and compliance with existing environmental legislation is a must and would address many of these issues. The Committee noted that Ireland is currently on its fifth Nitrates Action Programme and acknowledged that each iteration of the plan required more stringent measures due to a lack of implementation of existing legislation.

55. The Committee noted the role of Inland Fisheries Ireland, IFI in protection, management and conservation of freshwater habitats and their species, water quality and biodiversity within water bodies. Mr Francis O'Donnell, Chief Executive Officer, IFI, stated that the IFI's work aligns with several of the recommendations of the Citizens' Assembly and, as such, should be considered a key stakeholder in the delivery of protecting and restoring biodiversity in Ireland's freshwater and coastal waters.

56. Mr O'Donnell outlined a number of programmes developed by the IFI and in collaboration with other relevant government departments. These include habitat restoration plans for rivers impacted by land drainage, riverine restoration programmes for the protection and restoration of freshwater aquatic systems. The Committee noted that an applied climate change mitigation programme is underway to bridge the gap in knowledge around the impacts of climate change on inland waters.

57. Mr O'Donnell also highlighted the IFI's role in managing aquatic and riparian invasive species. The Committee noted the need for legislation and

strengthened enforcement across Ireland to prevent the spread of invasive species. However, the Committee expressed concern regarding the lack of infrastructure to support such legislation. Mr O'Donnell stated that the IFI is examining a number of potential avenues including sanitation certificates for moving boats to a new water body. While such measures will require resourcing at a cost, the Committee noted that the biological and ecological implications would be a greater risk, with the cost of managing and containing non-native species rising very quickly.

58. The Committee noted that much of the legislation in this area is antiquated. Mr O'Donnell highlighted that significant numbers of juvenile salmon and trout have been killed in river systems with very minimal fines issued for such environmental crimes. While many of these crimes are accidental, the Committee noted the view that current fines do not provide adequate deterrence with the IFI stating that a robust review of the financial penalties associated with wildlife, water quality and habitat destruction should be undertaken.
59. The Department of Housing, Local Government and Heritage stated that the recommendations relating to freshwater as set out in the Citizens' Assembly report align well with and informed the planned measures as set out in the forthcoming national River Basin Management Plan which will operate up to and including 2027. The Committee noted that this will be Ireland's national water plan and is key to tackling the pressures on water quality. Like the Climate Action Plan, the River Basin Management Plan will set out measures and policies, responsibility and timelines.
60. The Committee noted that the EU Water Framework Directive has significantly impacted policy around water quality with the Department outlining that:

“The concept to good water quality has significantly changed since the Directive was introduced. The term ‘water status’ relates to the overall condition of aquatic

ecosystems. Surface water bodies are classified by their ecological status which includes; biology, chemical water quality and hydromorphology/physical condition, combined. Hazardous chemicals are also monitored for. All of this information is combined to provide an overall status of surface water bodies. Groundwater bodies are similarly classified but assessments relate to chemical status and quantitative status (the amount of water present). The element with the lowest status for any given water body determines the overall classification, and is referred to as the 'one out, all out' principle. Assessing natural water bodies is a comprehensive process."

61. Dr Cotter stated that local authorities, in particular, must fully implement and enforce legislation for which they are responsible, including agricultural inspections, septic tank inspections and trade effluent licensed discharges. The Committee noted that farm inspections are currently 43% below what they were before the Covid-19 pandemic began. Dr Cotter stated that such inspections should be especially targeted in areas where water quality is at risk.
62. The Department of Housing, Local Government and Heritage highlighted that local authorities together with local authority waters programme (LAWPRO) are developing an implementation strategy for nature-based sustainable urban drainage systems on a national scale to improve wastewater infrastructure. The Committee expressed concern with regard to Uisce Éireann's capacity to manage the challenges with wastewater, however, Mr Fintan Towey stated that Uisce Éireann is very well resourced to address the challenges but that many of the issues require significant upgrade projects that take several years. As such there is no overnight solution to many of the infrastructure challenges associated with wastewater.
63. The Committee noted that, as part of their regulatory authority over certain industries, such as wastewater treatment plants, the EPA can take cases at

District Court level and that local authorities also have the option to do this. Ms Mary Gurrie, EPA, highlighted that sanctions for significant breaches of legislation have an important role in enforcement and are utilised by the EPA and are also expected to be applied by local authorities. The Committee noted that all enforcement tools need improving according to the EPA's local authority performance reports.

64. The Committee noted that the Land Use Review currently underway by the EPA provides an opportunity for a path to better land use to maximise the benefits for the environment, economics and society as a whole. Phase 1 of the Land Use Review examined how land is currently used in Ireland with 10 reports published in March 2023 outlining the findings. Phase 2 has recently commenced and will seek to optimise land use across key Government objectives improving socioeconomic, climate, biodiversity, water, and air quality outcomes.
65. Dr Cotter highlighted that a key finding of phase 1 of the land use review was the need for a land use map and a soil map that is overlain with ecosystems so that evidence-based decisions can be made on the optimum use of land. The Department of Agriculture highlighted that traditionally, a lot of forests were planted on peat soils. However, an action to implement a redesign of habitat restoration measure for forests on peatlands based on best available science is set out in Project Peatland to ensure the best use of legacy sites on peat.
66. The Department outlined that the Government's Forest Strategy was informed by the publication "Shared National Vision for Trees, Woods and Forests in Ireland". The recently approved Forestry Programme 2023-2027 aims to ensure that "the right tree in the right place for the right reason with the right management supporting a sustainable and thriving economy, society and healthy environment." The Committee noted that the programme focuses on delivering environmental social and recreational benefits for people from new and existing forests.

67. The Committee noted that while targeted measures are necessary to achieve outcomes around water quality and the protection of aquatic ecosystems and biodiversity, a one-size-fits-all approach will not work. Members agreed, given the widespread issues with water quality and land use, that targeted measures must be specific to local conditions. The Committee noted that this would require a challenging level of cross-sectoral coordination to achieve the benefits sought.
68. The EPA supported the Assembly's recommendation for more coordinated action and an over-arching strategic approach at national level to address the biodiversity crisis and stated that there is an opportunity to develop an overall integrated national environmental policy position that would set out Ireland's ambition for protecting the environment in the short, medium and long-term. The Committee agreed that this would provide some coherence for environmental protection and policy in Ireland.

Mandates of semi-State Bodies

69. The Committee received submissions from a number of stakeholders in relation to the mandates of semi-State bodies which can be found at Appendix 2 of this report. The Committee noted the view that the legal mandates of semi-State bodies are led by outdated legislation and should be reviewed and brought in line with the objectives of the Programme for Government, the Climate Action Plan and EU directives relating to biodiversity.
70. The Committee noted calls for reform of the mandates of semi-State bodies including Coillte and Bord na Móna as reflected in recommendations 120, 116 and 121 of the Citizens' Assembly report. While the Programme for Government provides for this reform at a political level, stakeholders suggested that without legislative change, these objectives cannot be effectively progressed.
71. Bord na Móna owns approximately 80,000 hectares, 1% of Ireland's land area comprised of a network of 130 bogs. Stakeholders emphasised the important role of rewetting and rehabilitation of industrial peatlands in Ireland's climate

policy. While the Climate Action Plan target for the restoration of peatlands is 33,000 hectares, the Committee noted the evidence that only EPA models with restoration of 70,000 hectares managed to achieve net-zero by 2050.

72. The Committee noted that Coillte is the largest landowner in the State, managing 440,000 hectares, 7% of Ireland's land area. 84% of this land is forested providing for 49.1% of Irish forestry in public ownership. 232,500 hectares of forestry managed by Coillte is on peatlands. From a biodiversity perspective, Members noted that Coillte owns approximately 96,000 hectares of Special Protection Areas, SPAs, Special Areas of Conservation, SACs, Natural Heritage Areas, NHAs and proposed Natural Heritage Areas, pNHAs. Such areas would also support a number of rare, threatened or endangered species and many important water bodies.

73. Under the Forestry Act 1988, Coillte's mandate provides for the business interests and profits of the company to be prioritised. Similarly, under the Turf Development Acts 1946-1998, Bord na Móna's current legal mandate is to prioritise the production of turf and turf products for commercial markets. The Committee noted that given the Coillte and Bord na Móna are bound by this legal mandate, biodiversity will remain a secondary priority. Members noted that this is not compatible with the national and EU policy.

74. The Department of Agriculture, Food and the Marine highlighted that Coillte's mandate is delivered as set out in the Shareholder Letter of Expectation which sets out specific objectives on climate action, biodiversity and bio-economy linked to Irish and EU policy and legislation. Coillte outlined that in the short term, it intends to increase forest estate managed primarily for biodiversity and nature from 20% to 30% by 2025 with a long-term goal of 50%. The Committee noted that financial sustainability is key to Coillte achieving biodiversity goals and that increasing the use of wood is an essential climate measure for the built environment to ensure Ireland is self-sufficient and to mitigate the pressures on forests on a global level.

75. The Committee noted the publication of Coillte's Strategic Vision in 2022 which contains 11 ambitions for contributing to national climate, biodiversity objectives and recreational objectives. While the Committee acknowledged the alignment of work being undertaken and supported by the Department of Agriculture, Food and the Marine with recommendations of the Citizens' Assembly report, members noted that the current legal mandates continue to conflict with policy.
76. Stakeholders agreed that the Arterial Drainage Act 1945 is no longer fit for purpose and is in urgent need of review. The Committee recommended a review of this legislation its own report on Biodiversity published in 2022. The Committee noted that, under the Act, the OPW are obliged to maintain waterways in a state of repair, maintained as it was when management first took place. An Taisce outlined that this results in the Arterial Drainage Act conflicting with the requirements of the Habitats Directive and the Water Framework Directive as waterways are maintained at an outdated point in time. The Committee noted, again, that the Act will continue to trump biodiversity concerns if not amended.
77. Mr Francis O'Donnell highlighted that the IFI have been working closely with ESB on the protection and restoration of biodiversity and habitats on a number of sites throughout Ireland. The ESB outlined that biodiversity impacts are considered in all areas comprising existing assets or where new asset investments are proposed within close proximity of designated sites or non-designated features of ecological interest. The Committee noted that ESB Group employs specialist environmental staff who are involved in all stages of projects to ensure implementation and enforcement of biodiversity related measures.
78. While the IFI stated that there has been a shift in focus around conservation with barrier mitigation a key priority, particularly for the critically endangered Atlantic salmon and European eel. The Committee acknowledged that there is a commercial element to this work and noted that there is pressure on the ESB to divert some of its profits to resolving some of these issues.

National Biodiversity Action Plan and Protected Sites

79. Dr Andy Bleasdale, National Parks and Wildlife Service, highlighted that the National Biodiversity Action Plan (NBAP) is an umbrella policy that will take account of EU and international biodiversity strategies as well as other relevant policies such as the Common Agricultural Policy, the Climate Action Plan and the River Basin Management Plan. The Committee noted that the fourth National Biodiversity Action Plan is due for publication in Q1 2024. The Committee noted that the NBAP will contain five strategic objectives underpinned by 194 actions that are linked to SMART targets, that is targets that are specific, measurable, achievable, realistic and timebound.
80. The Committee commended the increase in resources to the NPWS in recent years though it was acknowledged that greater resources were still needed to meet biodiversity targets. Members noted that due to the increase in resources the NPWS has become “Ireland’s nature agency” and now has the capacity to collaborate with other State bodies to protect and improve biodiversity and to enhance the enforcement of legislation. The Committee noted that growth in resources must be maintained over the coming decade in order to meet the challenges regarding biodiversity.
81. Dr Bleasdale outlined that many of the Citizens’ Assembly Recommendations will be addressed via actions in the current draft of the NBAP though the Committee acknowledged that some of the recommendations are beyond the remit of the National Parks and Wildlife Service. Members noted the inclusion of an action to put the NBAP on a statutory footing with more transparent reporting, governance and accountability structure for delivery of the plan.
82. Dr Deirdre Lynn highlighted that there is strong support across State bodies on reprioritising work to contribute to the restoration of biodiversity. However, the Committee expressed concern in relation to those semi-State bodies operating within a commercial system where a balance of nature protection and other objectives such as construction or renewable energy must be found. Ms Ciara Carberry stated that there is collaboration with the NPWS and semi-

State bodies in developing nature-positive plans and strategies that align with national priorities for nature restoration.

83. The Committee expressed concern regarding previous iterations of the NBAP which carried no geographic targets and whether the forthcoming NBAP would provide targets to inform the required progress reports. While Dr Lynn stated that there would be high level actions set out in the NBAP, the development of a national restoration plan as required under the nature restoration regulation will provide the prioritisation of actions. The Committee noted that the NBAP will be updated to reflect this in 2027.
84. Dr Ó Cinnéide expressed concern that previous iterations of the plan carried the same language and the same high-level targets. In addition, responsibility for the actions as set out in the NBAP primarily fall under the Department of Housing, Local Government and Heritage. The Committee noted that this contrasts with the Citizens' Assembly recommendations for a whole-of-government approach.
85. Members questioned whether the NBAP should be integrated with the climate action plan in order to have oversight from the Taoiseach's office. While the Committee noted that the biodiversity action plan will have a statutory basis, Dr Ó Cinnéide emphasised the need to go much further with targets and to link targets more closely to climate and water protection. The Committee noted the view that without specific targets, the NBAP will not have the biodiversity impact that is needed.
86. The Committee noted that designation and conservation of certain sites is required under European and national laws and that this is facilitated by the NPWS through special areas of conservation, SACs; special protection areas, SPAs; and national heritage areas, NHAs. Dr Bleasdale highlighted that there are more than 600 of these in Ireland protected under nature directives. The Committee also noted plans for the designation of marine protected areas, MPAs under new legislation.

87. The Committee noted that 85% of Ireland's habitats are assessed as being in an unfavourable conservation status. 46% of habitats are recorded to be in decline with only 2% of habitats reported as improving. Members acknowledged that over 70% of habitats are reported to be impacted by pressures relating to agricultural activities.
88. The Committee noted the popularity of national parks in Ireland and acknowledged the various habitats, landscapes and public and/or tourist attractions within each of the eight national parks. Mr Ó Donnchú stated that one of the challenges is ensuring the correct balance between visitor management and public enjoyment of the parks while also fulfilling conservation and nature obligations. The Committee noted that in most cases, national parks are designated as SACs or SPAs or a combination of both, ensuring that they are fully protected from a biodiversity perspective.
89. The Committee expressed concern around the management of national parks and that, given national parks are open to the public, there are no areas where nature is fully protected that are inaccessible to visitors. Mr Niall Ó Donnchú, NPWS, stated that there is no evidence that public access is damaging biodiversity, though there can be difficulties around fires being lit during peak visitor seasons. Dr Bleasdale stated that each national park is different and requires different levels of management depending on its specific conservation objectives, but that nature is the priority for all national parks.
90. Members also expressed concern in relation to the management of invasive species, particularly Japanese Sika deer which are contributing to the destruction of native woodland. While the Committee agreed that high-quality fencing would help to provide protection to many areas of woodland, some Members questioned whether more active deer management should also be considered. Mr Ó Donnchú stated that Sika deer are not termed as invasive species though they are managed along with red deer in the NPWS deer management programmes for national parks.

91. The Committee noted that in order to deliver the objectives of the NBAP, it will be essential to have the support and involvement of farmers to best manage the land. Dr Bleasdale highlighted that rewarding farmers for the delivery of ecosystem goods and services will impact on production, however, the Committee acknowledge that production must be less intensive in order to meet biodiversity objectives.
92. The Committee expressed concern that the work of the NPWS is not always aligned with the Department of Agriculture, Food and the Marine and outlined that farmers receiving compensation for designated lands lost that support following the implementation of the new agri-climate rural environment scheme, ACRES. The Committee noted a similar issue in the Burren where ACRES has now reduced payments to a scheme that was working and incentivising farmers to maintain nature in the region.
93. Dr Bleasdale stated that if there are failures within any scheme, they must be reflected on by the Department of Agriculture, Food and the Marine. The Committee noted that steering groups will oversee such projects and it is expected that farmers on the ground will inform future progressions of those projects.
94. Dr Bleasdale emphasised the importance of communication with the farming community to ensure that any changes are not seen as *“a stick being wielded to stop farming”*. The NPWS further highlighted the need to work with the Department of Agriculture, Food and the Marine to ensure the right incentives and funding are provided to deliver on the actions of the NBAP. The Committee noted that this would give control to farmers to be innovative in delivering ecosystem improvements and habitat management in order to gain rewards.
95. The Committee noted that the national restoration plan will move the focus away from the NPWS as the sole deliverer of solutions to an all-of-government solution. Dr Bleasdale stated that in previous engagement with the farming community, the NPWS was imposing restrictions in the absence

of a fund to deliver change. The Committee noted that any changes and transitions must be voluntary and with the agreement of the farming community. Dr Bleasdale stated that although there will be some resistance to the nature restoration regulation, it offers the opportunity for informed dialogue and support to farmers in any transition though it was acknowledged that there is significant work and negotiation yet to be done to produce that plan.

Conclusions and recommendations

1. The Committee notes and commends the considerable and robust examination of the issues by the Citizens' Assembly by diverse members from across the country including the expert advice given throughout the process.
2. The recommendations in this Joint Oireachtas Report represent our conclusions following a careful and thorough consideration of the Citizens' Assembly report on Biodiversity Loss. In addition, the Committee recommends that all recommendations of the Citizens' Assembly report on Biodiversity Loss be examined and considered for implementation by Government.
3. The Committee recommends that the calls to action as set out in the Children and Young People's Assembly on Biodiversity Loss should be examined and considered for implementation by the relevant government departments.
4. The Committee recommends that the calls to action set out in the Children and Young People's Assembly on Biodiversity Loss should be reflected in the National Biodiversity Action Plan and superseding plans and other relevant policies and decision-making processes.
5. The Committee recommends that this Departmental input, including timelines for implementation of measures, be collated and the resulting report be laid before the Houses of the Oireachtas within 6 months.
6. The Committee recommends that the recommendations and calls to action as set out in both Assembly reports should be accounted for within the National Biodiversity Action Plan and superseding plans.
7. The Committee recommends that, as a complement to the NBAP, the Government, led by the Department of An Taoiseach, sets out and oversees, communicates and implements a strategic vision for the well-being of the people of Ireland, and the future of rural communities, farmer livelihood, and rural development.

8. The Committee recommends that the State play a leading and supportive role in the adoption and implementation of an ambitious EU Nature Restoration Law.
9. The Committee acknowledges the important work of community organisations, and non-governmental organisations in the protection of biodiversity and our natural heritage, and in the potential for these groups to play an important role in the restoration of nature and biodiversity across Ireland. The Committee recommends that funding and support through targeted results-based schemes with measurable outcomes and accountability is maintained and increased where practicable.
10. The Committee recommends the Department of Further and Higher Education, Research Innovation and Science develops a strategy to support the national and EU ambition on biodiversity, soil, forestry and water, involving all agencies, higher education institutes and other organisations.
11. The Committee recommends the commencement of a robust public awareness campaign on the crisis in biodiversity.
12. The Committee recommends the implementation of measures to promote biodiversity literacy in the public sector.
13. The Committee recommends increased provision of biodiversity education in formal (e.g. primary and secondary curriculums), non-formal and informal education sectors.
14. The Committee recommends increased resourcing for farmers to enhance their biodiversity literacy, including particular supports for peer-to-peer training initiatives for nature restoration.

Environmental law and enforcement

15. The concern that fragmentation of responsibility and conflicting objectives are an obstacle to an effective strategy and the Assembly's call for new structures, such as a dedicated Oireachtas Committee on Biodiversity and a Cabinet Minister responsible for Biodiversity, should be reviewed as a matter

of urgency, and proposals from government should be presented to the Oireachtas before October 2024.

16. The Committee recommends a fundamental change in approach to environmental governance across government departments and that implementation and enforcement of existing environmental law be given priority. An immediate independent audit of enforcement across different legislation and agencies should be immediately commissioned, to report within six months, on:
 - Clarity of goals, responsibilities and of Key Performance Indicators
 - Effectiveness of deployment and adequacy of resources
 - Use of collaborative opportunities with other enforcement bodies
 - Powers and Penalties.
17. The Committee further recommends that relevant existing and any new national legislation be examined for compliance with EU environmental law.
18. The Committee notes the assembly's recommendation that the State would examine the development of an environmental court at Circuit and District Court levels. The Committee recommends that further examination of specialised environmental courts should be undertaken with a view to implementing specialised model that fits appropriately into Ireland's existing court structure.
19. The Committee also recommends a review of the affordability of accessing such courts in order to ensure their efficacy with regard to the enforcement of law.
20. The Committee recommends that the forthcoming National Biodiversity Action Plan and all superseding Plans be placed on a statutory footing to better ensure the implementation of measures. The new Plan must be strengthened through:
 - The establishment of clear targets with priority rating and timelines
 - The publication of a set of actions which have been evolved through consultation, shown capable of delivering on the targets in the most cost-effective manner, and have a clear line of responsibility

- A clear system of annual monitoring of the delivery of actions and progress towards targets, with proper accountability
- A system of feedback and adaptation of the Plan in the face of experience.

The Plan should have clearly defined ecological targets, with appropriate monitoring and timelines, to which all parties at national, regional and local levels are fully committed.

21. The Committee recommends that the State establish a National Biodiversity Data Centre on a statutory footing.
22. The Committee recommends that a wildlife crime unit be established within the NPWS.
23. The Committee recommends that action be taken to strengthen enforcement in relation to biodiversity and environmental issues across State bodies. Consideration should be given to the establishment of a wildlife crime unit within relevant bodies that is specifically focussed on enforcement. Collaboration across all enforcement bodies should be a priority when addressing environmental crime. The potential for a Memorandum of Understanding between an Garda Síochána and the NPWS to ensure greater enforcement in relation to wildlife crime should be explored.
24. The Committee recommends that a review of enforcement resources and practises be undertaken to identify possible collaboration opportunities between relevant state agencies.
25. The Committee recommends that all Departments review the enforcement powers and resourcing of environmental enforcement officers under their remit, including but not limited to the Environmental Protection Agency, the National parks and Wildlife Service, and Inland Fisheries. This review should identify where there are opportunities to provide additional powers to enforcement officers across various agencies and create efficiencies in the States enforcement capabilities, and to increase the number of officers on the ground who can respond to both wildlife crime, fisheries crime, and pollution incidents for example.

26. The Committee recommends that sanctions and penalties, financial or otherwise, for breaking environmental laws, wildlife crime and pollution incidents should be reviewed to ensure punishments are proportionate to the offence, so they adequately discourage negative behaviour.
27. The Committee recommends that further consideration is given to biodiversity in planning policy including an exploration of the concept of Net Gain.
28. The Committee recommends an independent review of access to justice for all citizens to ensure that those seeking to uphold environmental law and challenge decisions on environmental grounds and/or hold the State to account have the ability to do so, including that cost or the lack of financial means are not a barrier to accessing justice.
29. The Committee recommends that regulations should be introduced to require the re-use and recycling of precious metals and materials and that enforcement of such regulations should be prioritised over the use or extraction of new materials in order to protect biodiversity.
30. The Committee recommends that increased resourcing is provided to Environmental NGOs to uphold environmental law and / or to hold the State to account, enhancing their ability to protect and enhance habitats and the environment and to advocate for their protection.

Rights of nature and the right to a clean, healthy, sustainable environment

31. The Committee accepts, in principle, the recommendation of the Citizen's Assembly that the people of Ireland be afforded an opportunity, in a referendum or referenda, to protect our biodiversity through the incorporation of the rights of nature and/or the right to a healthy environment into Bunreacht na hÉireann (the Irish Constitution).
32. The Committee recommends the Government begin the preparatory steps to consider a referendum or referenda within the lifetime of the current Dáil, which includes the establishment of an expert group with resources to design and draft the potential question or questions. The expert group should

have broad expertise both on a national and international basis and should work to ensure that any questions provide a balance of rights and are appropriate to Ireland's constitutional context.

33. The Committee recommends the expert group review the international experience including the experience of other jurisdictions that have included environmental rights and / or the rights of nature in their constitutions and give these experiences due consideration to the issues that arose.
34. The Committee recommends the frontloading of a robust public awareness campaign in advance of any change to environmental rights/referendum on environmental rights to prevent the spread of misinformation and to encourage public debate on biodiversity.

Funding Nature Restoration

35. The Committee recommends a review of fiscal policy to identify biodiversity harmful subsidies and outline a pathway to end them.
36. The Committee recommends a review of fiscal policy to identify biodiversity harmful government spending and recommends measures are implemented to consider appropriate alternatives and to outline a pathway to end harmful government spending.
37. The Committee recommends a review of fiscal policy to consider measures that could be used to finance nature restoration.
38. The government should immediately establish a Biodiversity and Nature Restoration Fund that could be drawn down without delay, from which calls would be made for innovative initiatives from collaborative efforts across the community.
39. The Committee further recommends that public procurement should move from a price-only approach to the use of price-quality ratio and lifecycle approach including environmental and biodiversity criteria.
40. The Committee supports the development of a land use map to better understand current habitats and species to better inform reward schemes for

farmers. However, the Committee recommends that the development of a land use map should not delay the implementation of measures that could improve and restore biodiversity with current available data.

41. The Committee recommends that the Department of Finance undertake a comprehensive review of current and future taxation and levies with respect to their impact on biodiversity and act to amend taxation and levies which result in perverse incentives to damage nature.
42. The Committee recommends that when developing a model for ecosystem accounts and reward schemes, the Government should take a more nature-positive approach whereby financial or commercial value of measures should not be the main or only priority. Nature should be protected in a similar way to heritage buildings.
43. The Committee recommends a review of cost-benefit analysis models for assessing how public money is invested and to ensure all values are captured including environmental and social benefits and not just financial values. This will ensure a strategic approach to projects that values longer-term benefits. Nature-based solutions should be examined and the environmental, community and long-term benefits taken into account for addressing issues such as flooding.
44. The Committee recommends the Department of Finance review the opportunities to support the State's biodiversity goals through its plans, programmes and projects with mechanisms such as ecosystem services, ecological care and natural capital accounting.
45. The Committee recommends that the Department of Finance review the Green bond to ensure it is 100% compliant with the EU taxonomy and also reflects other climate and biodiversity obligations.
46. The Committee recommends that the Department of Finance be resourced with experts to ensure the taxation system and policy measures provide benefits to biodiversity.

47. The Committee notes the considerable sums of money on deposit in Ireland and recommends that the State investigate the establishment of a citizens Green Bond to support investment in nature restoration, conservation and climate related projects. This would have a dual purpose of an educational element about projects being undertaken and a sense of contributing to the funding of nature restoration.
48. The Committee recommends farmers and non-farming landowners are financially rewarded for the provision of ecosystem services and ecological care and the restoration and protection of nature through results-based payments. Those working the land must be shown how there can be prosperous family farms in the years ahead deriving income from both quality food production and from environmental services.
49. The Committee acknowledges that our country's progress should not be based solely on the narrow lens of economic growth, but instead should capture overall quality of life across health, environmental, social and economic areas. To this end, the Committee recommends the establishment of a new Ombudsman for Future Generations with the resources of an office, or a Future Generations Commission to protect the long-term interests of human and ecological well-being for current and future generations.

Land use and water quality

50. The Committee recommends that policy and targets should be made clearer to ensure that there are no conflicting demands being made on farmers and landowners. Better engagement with farmers would also encourage better understanding of what is expected.
51. The Committee recommends that agri-schemes be streamlined to ensure applications are straightforward. Farmers should be supported at a local level to remove barriers and encourage farmers to participate in schemes to benefit the environment. A clear definition of what is to be delivered should be provided to farmers.
52. The Committee recommends that further funding/support schemes which align with the principles of a just transition and incentivise environmental

protection, nature restoration and the enhancement of biodiversity, should be made available to farmers in addition to those provided for by the CAP. The Committee also recommends that longer-term support schemes should be considered.

53. The Committee recommends that Government agricultural policy be comprehensively reviewed for compliance with the protection of biodiversity and the environment.
54. The Committee notes with concern the impact the intensification and industrialisation of agriculture has had on biodiversity, particularly in the last decade, and recommends that policies that promote this intensification be reviewed.
55. The Committee is extremely concerned about water quality in Ireland, in particular following the EPA's report that Ireland only has 32 pristine rivers out of what was 500, and in that context notes the decision of the European Commission to lower the maximum nitrate allowance for Ireland. The Committee recommends that all appropriate steps be taken to significantly improve water quality in line with the EU Water Framework Directive.
56. The Committee recommends that agricultural subsidy schemes must not restrict farmers in their ambition to make changes for the benefit of biodiversity, and to the greatest extent possible payments should be results based over the whole farm rather, than area-based payment. Farmers who protect and enhance biodiversity should be financially rewarded for the ecosystem services they provide.
57. The Committee recommends additional resources are invested in streamlining and simplifying the measuring and monitoring of key biodiversity indicators on farms, and upskilling and training is increased for farm assessors and advisors.
58. The Committee recommends the full implementation and compliance with existing environmental legislation with regard to land use and water quality

particularly in relation to local authorities and public bodies such as Uisce Éireann. The Committee further recommends increased intensity in the programme of works to prevent the unacceptable discharge of raw or partially treated sewage into any fresh or marine waters is prevented and the frequency of any untreated water discharge events is reduced to zero.

59. The Committee recommends the immediate increase of inspections by local authorities, and LAWPRO to include farm inspections and septic tank inspections, in particular for compliance with the Nitrates Action Programme. Such inspections should be targeted in areas where water quality is at risk. Local authorities should be equipped with the resources necessary.
60. The Committee recommends better uptake of enforcement tools including sanctions at local authority level in accordance with the findings of the EPA's local authority performance reports.
61. The Committee recommends better coordination on a cross-sectoral basis to address water quality issues on a more targeted local level.
62. The Committee recommends nature-based solutions are adopted to tackle flood management and should include whole of catchment area hydromorphology, planning and restoration.
63. The Committee recommends the Department of Housing, Local Government and Heritage update and publish final guidance on 'Nature based solutions to the management of rainwater and surface water runoff in urban areas' for use by both planning and design professionals, and for planning authorities to guide considerations on planning applications of all scales.
64. The Committee recommends the Department of Housing Local Government and Heritage publish guidance on nature-based solutions for flooding in rural areas in co-operation with the Department of Agriculture, Food and the Marine, the Office of Public Works, Inland Fisheries Ireland, ESB, Bord na Mona, Coillte and any other agencies with responsibilities for river water management or activities which have a significant influence on land drainage and flooding.

65. The Committee recognises the importance of organic farming and locally grown produce for food production, biodiversity, and water quality and recommends supports for this industry are reviewed to ensure they align with 'Ireland's Strategy for the Development of the Organic Sector 2019 – 2025' and for the medium to long term growth of this sector.
66. The Committee recommends the Department of Agriculture, Food and the Marine prepare guidance on restoring soil health.

Mandates of semi-State bodies

67. The Committee recommends that the legislation governing Coillte and Bord na Mona (namely, the Forestry Act 1988, and the Turf Development Acts 1946-1988) is urgently reviewed and amended to align with national and EU laws and biodiversity objectives. Amendments must ensure that the mandates and functions of those organisations include the protection, promotion and enhancement biodiversity and do not conflict with or hinder progress in relation to biodiversity restoration, and that the narrow commercial functions of these organisations are also expanded to include community and public benefit as core objectives, with a focus on peatland restoration and rehabilitation, native woodland and ecosystem services, as appropriate.
68. The Committee recommends that the Arterial Drainage Act 1945 be urgently reviewed and amended to align with national and EU laws and objectives to protect, promote and enhance biodiversity. The Committee recommends the Department of Public Expenditure, National Development Plan Delivery and Reform undertake a review of all functioning of the Act and prepare a report within 6 months outlining potential amendments to the Act to ensure it is aligned with national and EU laws and objectives to protect, promote and enhance biodiversity.
69. The Committee recommends that a far larger proportion of the land owned by Bord na Mona and Coillte should be specifically designated for biodiversity protection, enhancement and promotion.

70. The Committee strongly recommends that targets be incorporated into the NBAP, and that reporting mechanisms be established that follow the governance structures for the CAP.
71. The new plan should include geographic targets, for example for a specific river catchment. It should also consider sectoral agreements embracing all stakeholders pledged to remove environmental damage throughout the supply chain from initial design to final disposal, starting with the Food Sector, and our Planning Development and Construction of Buildings and Infrastructure.
72. The delivery of the National Biodiversity Action Plan should be aligned with the Climate Action Plan and overseen in the same way from the Taoiseach's office.

National Biodiversity Action Plan and designated sites

73. The Committee noted the planned action to place the NBAP on a statutory footing. However, the Committee recommends that clear and specific targets be set out and integrated with the Climate Action Plan to provide a clear pathway to implementation to ensure effective and efficient progress is made in relation to biodiversity measures.
74. The Committee recommends that National Biodiversity Action Plan should set out a whole-of-government approach to the implementation of actions and measures to encourage greater collaboration at national, regional and local levels.
75. The Committee recommends that a network of wildlife corridors, paths, tunnels and bridges be created in both urban and rural areas across Ireland.
76. The Committee recommends that more land be given to national parks, protected areas, more special areas of conservation be designated, to include a number of areas with the highest level of protection are created.
77. The Committee recommends that national parks incorporate 'highly protected' areas to facilitate full protection of nature in some spaces.

78. The Committee recommends that certain areas of national parks be made inaccessible to the public to allow for the full protection of nature in some spaces in line with the International Union for Conservation of Nature (IUCN) protected area management category 1a - strict nature reserve. The NPWS should review its land holdings and where discrepancies exist between the protected area management categories and the existing land uses, the NPWS should endeavour to bring those lands in line with the IUCN definition of a National Park.
79. The Committee recommends that measures are introduced to expand national parks for the benefit of the public and nature and that increased resources are made available to restore them. NPWS should develop a work plan to ensure the most valuable woodlands in the national parks are free from Rhododendron and invasive species.
80. The Committee recommends that measures are introduced to expand native woodlands and that increased resources are made available to restore them.
81. The Committee recommends that measures are introduced to expand urban green spaces and increased resources are made available to restore them.
82. The Committee recommends that this report should be debated in both Houses of the Oireachtas.
83. The Committee recommends that new legislation is introduced for the protection of trees, hedgerows, and native woodlands, to ensure these important elements of our natural heritage are sufficiently protected and managed and legislation is fit for purpose.
84. The Committee recommends that legislation to designate Marine Protected Areas is progressed through the Oireachtas with urgency in line with EU targets to designate 30% of our waters (with 10% having the strictest protection) by 2030 and that appropriate resources are given for enforcement of such protection.

85. The Committee recommends that local authorities are empowered, subject to appropriate protections, to designate sites that are considered locally important for biodiversity and ecosystem services and put in place measures to manage and conserve these sites in a nature positive manner for the public interest. Such sites would not preclude development from taking place, but any development would need to be planned to ensure the special natural features of the site are protected as far as practicable.
86. The Committee recommends that certain areas of national parks be made inaccessible to the public to allow for the full protection of nature in some spaces.

Appendix 1 – Terms of Reference

Functions of the Committee – derived from Standing Orders [DSO 95; SSO 71]

- (1) The Select Committee shall consider and, unless otherwise provided for in these Standing Orders or by order, to report to the Dáil on any matter relating to —
 - (a) legislation, policy, governance, expenditure and administration of—
 - (i) a Government Department, and
 - (ii) State bodies within the responsibility of such Department, and
 - (b) the performance of a non-State body in relation to an agreement for the provision of services that it has entered into with any such Government Department or State body.
- (2) The Select Committee appointed pursuant to this Standing Order shall also consider such other matters which—
 - (a) stand referred to the Committee by virtue of these Standing Orders or statute law, or
 - (b) shall be referred to the Committee by order of the Dáil.
- (3) The principal purpose of Committee consideration of matters of policy, governance, expenditure and administration under paragraph (1) shall be—
 - (a) for the accountability of the relevant Minister or Minister of State, and
 - (b) to assess the performance of the relevant Government Department or of a State body within the responsibility of the relevant Department, in delivering public services while achieving intended outcomes, including value for money.
- (4) The Select Committee appointed pursuant to this Standing Order shall not consider any matter relating to accounts audited by, or reports of, the Comptroller and Auditor General unless the Committee of Public Accounts—
 - (a) consents to such consideration, or
 - (b) has reported on such accounts or reports.
- (5) The Select Committee appointed pursuant to this Standing Order may be joined with a Select Committee appointed by Seanad Éireann to be and act as a Joint Committee for the purposes of paragraph (1) and such other purposes as may be specified in these Standing Orders or by order of the Dáil: provided that the Joint Committee shall not consider—

- (a) the Committee Stage of a Bill,
 - (b) Estimates for Public Services, or
 - (c) a proposal contained in a motion for the approval of an international agreement involving a charge upon public funds referred to the Committee by order of the Dáil.
- (6) Any report that the Joint Committee proposes to make shall, on adoption by the Joint Committee, be made to both Houses of the Oireachtas.
- (7) The Chairman of the Select Committee appointed pursuant to this Standing Order shall also be Chairman of the Joint Committee.
- (8) Where the Select Committee proposes to consider—
- (a) EU draft legislative acts standing referred to the Select Committee under Standing Order 133, including the compliance of such acts with the principle of subsidiarity,
 - (b) other proposals for EU legislation and related policy issues, including programmes and guidelines prepared by the European Commission as a basis of possible legislative action,
 - (c) non-legislative documents published by any EU institution in relation to EU policy matters, or
 - (d) matters listed for consideration on the agenda for meetings of the relevant Council (of Ministers) of the European Union and the outcome of such meetings,
- the following may be notified accordingly and shall have the right to attend and take part in such consideration without having a right to move motions or amendments or the right to vote:
- (i) members of the European Parliament elected from constituencies in Ireland,
 - (ii) members of the Irish delegation to the Parliamentary Assembly of the Council of Europe, and
 - (iii) at the invitation of the Committee, other members of the European Parliament.
- (9) The Select Committee appointed pursuant to this Standing Order may, in respect of any Ombudsman charged with oversight of public services within the policy remit of the relevant Department consider—
- (a) such motions relating to the appointment of an Ombudsman as may be referred to the Committee, and
 - (b) such Ombudsman reports laid before either or both Houses of the Oireachtas as the Committee may select: Provided that the provisions

of Standing Order 130 apply where the Select Committee has not considered the Ombudsman report, or a portion or portions thereof, within two months (excluding Christmas, Easter or summer recess periods) of the report being laid before either or both Houses of the Oireachtas.

b. Scope and Context of Activities of Committees (as derived from Standing Orders) [DSO 94; SSO 70]

- (1) It shall be an instruction to each Select Committee that—
- (a) it may only consider such matters, engage in such activities, exercise such powers and discharge such functions as are specifically authorised under its orders of reference and under Standing Orders;
 - (b) such matters, activities, powers and functions shall be relevant to, and shall arise only in the context of, the preparation of a report to the Dáil;
 - (c) it shall not consider any matter which is being considered, or of which notice has been given of a proposal to consider, by the Joint Committee on Public Petitions in the exercise of its functions under Standing Order 125(1)1; and
 - (d) it shall refrain from inquiring into in public session or publishing confidential information regarding any matter if so requested, for stated reasons given in writing, by—
 - (i) a member of the Government or a Minister of State, or
 - (ii) the principal office-holder of a State body within the responsibility of a Government Department or
 - (iii) the principal office-holder of a non-State body which is partly funded by the State,

Provided that the Committee may appeal any such request made to the Ceann Comhairle, whose decision shall be final.

- (2) It shall be an instruction to all Select Committees to which Bills are referred that they shall ensure that not more than two Select Committees shall meet to consider a Bill on any given day, unless the Dáil, after due notice to the Business Committee by a Chairman of one of the Select Committees concerned, waives this instruction.

Appendix 2 – Mapping Document

Brief summary of responses

Recommendations 15, 57, 62, 75, 78, 79, 81, 82, 109, 121, 128, 136 are already implemented.

Recommendations in progress are:

1-22; 24-26; 29-30; 32-34; 36-38; 41-50; 52-55; 58-61; 63-64; 68-72; 74; 76; 77; 80; 84; 86; 88; 89; 90; 91; 94; 95; 98-103; 105-107; 110-116; 118-119; 122; 123; 124-127; 129; 131-135; 137-139; 142; 145-149; 155-159. (may need to request further info on 85 from Teagasc)

Recommendations that are not being implemented are:

23; 27; 28; 31; 35; 39; 40; 51; 56; 65-67; 73; 83; 87; 92-93; 96; 97; 104; 108; 117; 120; 130; 140; 141; 143; 144; 150-154.

The vast majority of the recommendations are in progress via proposed actions of the forthcoming National Biodiversity Action Plan which is expected to be published later this year. The Nature Restoration Regulation will also have an impact in addressing many of the recommendations in this space.

Members should note the details of those recommendations that are not being implemented. In many cases, there are other commitments already in motion through the current Programme for Government (or Housing for All and other strategies) that cover aspects of the recommendation though perhaps not as a whole.

Mapping of the implementation of recommendations of the Citizens' Assembly Biodiversity Report

Recommendation	Status: Implemented / In Progress / Not Being Implemented
<p>1 - The State must take prompt, decisive and urgent action to address biodiversity loss and restoration and must provide leadership in protecting Ireland's biodiversity for future generations.</p>	<p>In progress - National biodiversity action plan (NBAP) Ireland also voted in favour of the Nature Restoration Regulation at EU Council</p>
<p>2 - The Assembly believes that the State has comprehensively failed to adequately fund, implement and enforce existing national legislation, national policies, EU biodiversity-related laws and directives related to biodiversity. This must change.</p>	<p>In progress – National Parks and Wildlife Service Strategic Action Plan is in progress. NBAP proposes: Strategic Nature Fund; commitments to review licensing and consent systems to facilitate sustainable activities within Natura 2000 sites; enactment and implementation of legislation enabling the designation and management of MPAs.</p>
<p>3 - The ambition of the State needs to be significantly increased to reflect the scale of Ireland's biodiversity crisis. Adequate funding must be made available to address this crisis. This is likely to require substantial and sustained increases in expenditure, which should be made available immediately and guaranteed in the long term.</p>	<p>In progress - The DPENDPR stated in their response that funding for individual policy measures must be proposed by Departments with responsibility for those particular areas and will be considered and</p>

	approved in the context of the annual Estimate process.
4 - The responsibility for the implementation and enforcement of biodiversity related legislation, directives and policies by all state bodies and agencies must be made clear, with each body/agency held publicly accountable for their performance. This should be supported by an independent review of implementation and enforcement of biodiversity related legislation, directives and policies.	In progress via proposed actions of the National Biodiversity Action Plan.
5 - The State must provide, communicate and implement a plan for the conservation and restoration of biodiversity for the benefit of its people.	In progress via proposed action of the NBAP – to publish a National Restoration Plan and engage with stakeholders on the development of the plan.
6 - Local leadership, local communities and the activities of the Non Governmental Organisation (NGO) sector must be actively developed and resourced to assist the State in addressing the biodiversity crisis.	In progress – funding provided through the NPWS Biodiversity Officer Programme. There is also a target in the NBAP to review cross-departmental capacity and capability required to achieve biodiversity goals.
7 - In taking action to protect and restore biodiversity, nature-based solutions aimed at protecting, sustainably managing and restoring ecosystems should be prioritised where possible.	In progress – NBS referenced throughout the NBAP; Marine Strategy Framework Directive includes measures for NBS in coastal and marine systems. DHLGH has published <i>Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas</i> for urban planning and design professionals and the OPW is actively pursuing a NBS approach.

<p>8 - As a matter of urgency areas and species of High Nature Value, including but not limited to the national network of Natura 2000 sites and protected species, should be protected from further degradation through the implementation and enforcement of existing legislation and directives. Management plans should also include restoration programmes.</p>	<p>In progress – a number of proposed actions of the National Biodiversity Action Plan</p>
<p>9 - Ireland’s varied land and seascapes across and around the island must be supported, and appropriate monitoring systems designed to suit their local environment. Higher incentives and supports should be provided to prioritise the preservation and restoration of rare and threatened species.</p>	<p>In progress – monitoring in progress through article 12 and 17 of the Birds and Habitats Directives. New commitment to long term biodiversity monitoring under the CAP strategic Plan. Following schemes also provide incentives for preservation and restoration of rare species: NPWS Farm Plans; CAP Agri-climate Rural Environment Scheme (ACRE)S; LIFE projects.</p>
<p>10 - Ireland needs to recognise its global responsibility, including through our local actions, in terms of our consumerism, resource usage and our international biodiversity responsibilities. The State should advocate for a shift in emphasis in EU and international economic policy away from GDP expansion as a goal in itself and towards the goals of societal and ecological wellbeing.</p>	<p>In progress – action proposed to increase Ireland’s Overseas Development Aid contributions to biodiversity-related projects.</p>
<p>11 - An all-island approach and wider transboundary approach should be taken into consideration with regard to biodiversity conservation and restoration.</p>	<p>In progress – cross border initiatives in place such as PEACEPLUs, Shared Island funding. Increased ambition for cross-border collaboration in NBAP.</p>
<p>12 - The State should renew and stand by its commitment to implement the objectives and targets of the EU 2030 Biodiversity Strategy and play a leading and supportive role in the adoption and implementation of a new EU Nature Restoration Regulation.</p>	<p>In progress – Nature Restoration Regulation. NBAP proposes design and implementation of National Restoration Plan and establishment of a Strategic Nature Fund.</p>

<p>13 - All governmental departments must explicitly acknowledge the State's declaration of a Biodiversity Emergency and take immediate and targeted action.</p>	<p>In progress – NBAP is on a statutory footing and proposes that each entity responsible for actions in NBAP report on the progress of implementation.</p>
<p>14 - All biodiversity incentives and grants should be results-based, supported by monitoring and evaluation.</p>	<p>In progress via the new CAP, the NPWS Farm Plan scheme and through LIFE Projects. NBAP also proposes action for DAFM and Teagasc to develop and implement results based agri-environmental climate measures.</p>
<p>15 - People in primary production industries should implement practices that conserve biodiversity and be incentivised for biodiversity enhancement and associated ecosystem service provision.</p>	<p>Implemented. In progress via the CAP Strategic Plan and actions proposed in the NBAP.</p>
<p>16 - The State must work with all stakeholders to review Ireland's current food policy in the context of the biodiversity crisis, particularly in agriculture and marine sectors, to balance between the affordability and quality of food. This review must take into consideration vulnerable sections of the population and ensure reasonable standards of living, and result in a plan to address these issues.</p>	<p>In progress via the draft national Food Waste Prevention Roadmap. DAFM has stated that environmental sustainability is a central principal of the Food Vision 2030, CAP strategic plan and new Forestry Policy Programme.</p>
<p>17 - The Irish business community needs to engage with biodiversity and show leadership in the same way that they have begun to engage with the issue of the climate crisis.</p>	<p>In progress – Business for Biodiversity Ireland platform established with support from NPWS and DAFM. Actions also proposed in NBAP.</p>
<p>18 - In order to drastically reduce the use of pesticides by at least 50% by 2030 in line with EU policy, the State should incentivise and encourage the domestic and commercial use of natural, cost friendly alternatives, sustainable practices and biodiversity-friendly solutions. It should also regulate the use of chemical pesticides and fertilisers, while maintaining food security. This should coincide with the improvement of schemes for the safe disposal of unused hazardous materials, as well as their containers.</p>	<p>In progress – action in NBAP to reduce pesticide use by 50%. DAFM stated that Ireland supports the Farm to Fork Strategy and is working on the EU proposal for a Sustainable Use Regulation (SUR).</p>

	<p>The nitrates Action Programme regulates the use of fertilisers. National Action Plan sets out objectives for sustainable use of pesticides.</p>
<p>19 - Examples of good practice in relation to biodiversity protection and enhancement should be actively identified and supported with funding, infrastructure and other supports provided to enable replication or expansion of these practices, in partnership with those who design and operate such initiatives and schemes, e.g. the Burren Programme, Biodiversity Regeneration In a Dairying Environment (BRIDE) programme. and the Sustainable Uplands Agri-environment Scheme (SUAS).</p>	<p>In progress – NBAP proposes action for support of NPWS Farm Plan Scheme. Guidance document “best practice in raised bog restoration” published.</p>
<p>20 - The State is urged to take into account the recommendations from the Children and Young People’s Assembly on Biodiversity Loss, an initiative featuring our next generation, and continue to engage with children and young people on the environment.</p>	<p>In progress – NBAP proposes action for NPWS to support establishment of Youth Biodiversity Forum.</p>
<p>21 - There must be a whole of State approach to drafting and implementing a new statutory National Biodiversity Plan, aligned with the Climate Action Plan, supported by legislation and properly funded. This and subsequent plans must not be constrained by electoral cycles and should have clearly defined ecological targets (e.g. the number of species on the at-risk list to be halved), with appropriate monitoring and timelines, to which all parties at national, regional and local levels are fully committed.</p>	<p>In progress – NBAP includes SMART targets. A ‘whole of state’ approach was undertaken to draft the NBAP.</p>
<p>22 - There should be a senior ministerial position, with an associated department, with responsibility for biodiversity.</p>	<p>In progress – Minister of State for Land Use and Biodiversity in DAFM.</p>
<p>23. There should be a permanent, cross-party Standing Oireachtas Committee on Biodiversity Loss, which will consider and respond to the recommendations of this Assembly, within 6 to 12 months.</p>	<p>Not being implemented – Department of Housing has responded that this is a matter for the Houses of the Oireachtas. Technically the latter half of this recommendation is implemented via this Committee but a dedicated Committee could still be recommended to oversee the implementation in the longer term.</p>

<p>24. There should be a new national independent agency to act as a centralised biodiversity coordinating structure to:</p> <ul style="list-style-type: none"> i. Coordinate: <ul style="list-style-type: none"> a. Government departments in their biodiversity-related actions. b. Government policy and ensure the coherence of these policies. ii. Coordinate budgets related to biodiversity actions. iii. Drive consultation around biodiversity actions. iv. Oversee and coordinate enforcement organisations. v. Implement, monitor and report biodiversity actions transparently. vi. Oversee education and public engagement related to biodiversity. vii. Oversee and coordinate research and data collection. viii. Act as a point of contact for members of the public and industry to liaise with supports related to biodiversity conservation and restoration. ix. Act in alignment with the Climate Change Advisory Council. x. Set up an Emergency Task Force. 	<p>In progress partially via the NPWS. Not being implemented via Dept of an Taoiseach.</p>
<p>25 - The new National Biodiversity Plan and all policies related to biodiversity action at national and local level should be developed in partnership with the people and sectors most affected by changes (i.e. local communities, farmers, fishers, business, etc.). In many cases consultation has to move beyond the current status quo, with trust having to be rebuilt and relationships realigned.</p>	<p>In progress – NBAP was developed through public consultation including the Biodiversity Conference. NBAP proposes enhanced outreach across sectors via the Biodiversity Forum. NPWS appointed a Head of Engagement and Communications and LIFE projects carry out community engagement.</p>
<p>26 - The new National Biodiversity Plan should have clear targets with ambitious and achievable timelines at national, regional and county level for halting biodiversity loss, restoring and enhancing biodiversity.</p>	<p>In progress – NBAP includes SMART (specific, measurable, achievable, relevant and time-bound) targets. Regional and local targets set through local plans mandated at national level.</p>
<p>27 - In addition to recent developments in judicial structures in environment and planning, the State must develop an environmental court at Circuit and District Court levels, in order to hold policy makers, businesses and citizens to account.</p>	<p>Not being implemented as per the recommendation.</p>

	<p>Current Programme for Government and Housing for All commits to the establishment of a dedicated Planning and Environmental Court within the High Court.</p>
<p>28 - All citizens should be empowered with 'legal standing' to protect nature and biodiversity in court.</p>	<p>Not being implemented as per the recommendation.</p> <p>Current programme for Government and Housing for All commits to the establishment of a dedicated Planning and Environmental Court within the High Court.</p>
<p>29 - Each local authority must have at least one full-time dedicated biodiversity officer, the total number of which should be determined by population density, land mass and coastline.</p>	<p>In progress – Heritage Council Biodiversity Officer programme launched in Jan 2023.</p>
<p>30 - All relevant departments, bodies and agencies that deal with biodiversity should have in-house ecological expertise to advise on all biodiversity related policies and activities.</p>	<p>In progress – NBAP proposes action for this as does the NPWS Strategic Action Plan.</p>
<p>31 - There should be a referendum of the people to amend the Constitution with a view to protecting biodiversity. The proposal to amend the Constitution should include:</p> <p>a. Human substantive environmental rights, e.g. a right to a clean, healthy, safe environment; a right to a stable and healthy climate; rights of future generations to these or other environmental rights.</p> <p>b. Human procedural environmental rights, e.g. the Aarhus rights regarding access to environmental information, public participation in environmental decision-making and justice in environmental matters.</p> <p>c. Substantive rights of nature, recognising nature as a holder of legal rights, comparable to companies or people e.g. to exist, flourish/perpetuate and be restored if degraded; not to be polluted/harmed/degraded.</p> <p>d. Procedural rights of nature, e.g. to be a party in administrative decision-making, litigation, etc. where rights are impacted/likely to be impacted.</p>	<p>Not being implemented – no decision made by Government.</p> <p>Dept of Housing has stated there is an action proposed in 4th NBAP for NPWS to explore ways in which the rights of nature could be formally recognised including constitutional change.</p>

<p>32 - Sufficient funding and resources to meet the challenges of biodiversity loss must be allocated to all relevant bodies to sufficiently protect and enhance biodiversity, and implement and enforce related national and EU laws, directives and policies. This must be guaranteed in the short and longer term.</p>	<p>In progress - The DPENDPR stated in their response that funding for individual policy measures must be proposed by Departments with responsibility for those particular areas and will be considered and approved in the context of the annual Estimate process. NBAP seeks to establish a Strategic Nature Fund to support National Restoration Plan.</p>
<p>33 - The Government's economic strategy needs to continue nurturing and embracing fully the 'Beyond GDP' concept and ensure that the National Well-being Framework, encompassing Environment, Climate and Biodiversity, is at the very core of economic decisions made now and in the future.</p>	<p>In progress – annual reporting across the Budget cycle is advancing the National Well-being Framework into decision-making. DPENDR are advancing further integration of the Framework into policy-making and expenditure. an inter-Departmental Group is driving further integration across Government.</p>
<p>34 - The Well-being Framework for Ireland should be modified so that it more accurately measures economic, social and environmental progress in Ireland, with the metrics reported alongside GDP as an indication of how well Ireland is doing, and be given a strong role in shaping policy and informing the annual budgetary process.</p>	<p>In progress – Gov has committed to a formal review of the Framework after 4 years (2026). As per rec 33, the Wellbeing Framework is reported on annually, featuring across the budget cycle including the Summer Economic Statement which provides forecasting for budgetary decisions.</p>
<p>35 - The State must undertake a comprehensive review of current and future taxation and levy policies, regulations and incentives to assess their impact on biodiversity.</p>	<p>Not being implemented – The Department of Finance stated in their</p>

	<p>response that it is not possible to assess the impacts for biodiversity given the wide range of factors and requirement for expertise in assessing biodiversity. The Department of finance does not have this expertise and as such can only provide input on specific taxation measures such as rates/application/level of reliefs.</p> <p>However, the Dept of Housing has stated that the 4th NBAP proposes an action for DPENDPR to develop and implement systems for this.</p>
<p>36 - The State should significantly increase commitments and long-term funding with specific and targeted tax incentives and tax breaks to incentivise and support the regenerative economy, green technology and biodiversity activities.</p>	<p>In progress – there are a number of “green” incentives including Accelerated Capital Allowance schemes. Indirect tax measures include carbon tax, vat rate on solar panels, carbon tax relief for biofuels.</p>
<p>37 - The Assembly supports the State making Ireland a global leader in sustainable finance models.</p>	<p>In progress – through Ireland for Finance strategy and sustainable finance roadmap.</p>
<p>38 - The State should introduce a lower “green rate” for loans that fund biodiversity initiatives.</p>	<p>In progress – SBCI launching Growth and Sustainability Loan Scheme. 30% of this is targeted at SMEs to address climate objectives including biodiversity.</p>
<p>39 - Planning levies should include a proportional contribution, ringfenced to conserve and enhance biodiversity.</p>	<p>Not being implemented – collaboration and agreement is required from Department of</p>

	Housing, Local Government and Heritage Planning Division with DPENDPR and the Department of Finance.
40 - In addition to a dedicated biodiversity budget, governmental departments and agencies should be permitted to roll over any unspent biodiversity funding into the next year.	Not being implemented as not provided for in the Constitution.
41 - The State should establish a framework for corporations and large businesses, as major users of natural resources, to provide financial contributions to fund the conservation and restoration of biodiversity.	In progress – Peatland Finance Ireland working towards the establishment and management of a financing system for peatland restoration. LIFE SNaP Ireland project will have a role in developing pathways for businesses to contribute to biodiversity conservation.
42 - Local authorities are uniquely placed to deliver biodiversity projects. Biodiversity funding and staff resources in local authorities must be significantly increased. Local authorities must be accountable and report on their biodiversity activities. Current resources must be enhanced, and biodiversity given greater priority in the councils’ activities.	In progress – Heritage Council Biodiversity Officer programme established to employ a Biodiversity Officer for each local authority. Local biodiversity Action Fund doubled to 3m in 2023. NBAP proposes that by 2026 all local authorities will have a Biodiversity Action Plan in place subject to regular review.
43 - New sector-specific levies/charges on harmful imports must be introduced and ring-fenced for biodiversity. These should include: i. New sector-specific levies/charges on agricultural exports introduced and ring-fenced for biodiversity. ii. New sector-specific levies/charges on retailers introduced and ring-fenced for biodiversity.	In progress – NBAP proposes an action for DPENDR to develop and implement systems to track and report expenditure allocations on measures that may adversely impact biodiversity.

<p>44 - There should be an immediate review of existing frameworks and mechanisms for the implementation and enforcement of biodiversity policy and legislation. This review should identify those responsible, address gaps in responsibilities and policies, highlight areas with insufficient funding and result in a plan to address these issues.</p>	<p>In progress – NBAP proposes a number of related actions but resources will need to assigned to deliver these actions.</p>
<p>45 - Sanctions for an offence should be proportionate to the offence so they adequately discourage negative behaviour (e.g. penalties should be linked to company turnover), with the offender incurring the cost of undoing the damage. Each governmental department, organisation and agency responsible for enforcement should be provided with training, a clear remit, have sufficient resourcing and should be held accountable.</p>	<p>In progress – NBAP proposes action to increase compliance with wildlife legislation.</p> <p>DECC states that there is an ongoing review and revision of the Environmental Crime Directive underway. DECC is coordinating across Government in relation to Ireland’s input to this process.</p>
<p>46 - All penalties for any breach of pollution or environmental legislation/regulations should be increased to meaningful economic levels, reflecting all damage caused plus enforcement and restoration costs, with criminal sanction where necessary.</p>	<p>In progress partially – action proposed in NBAP for DAFM to review the EIA regulations.</p> <p>As part of the review and revision of the Environmental Crime Directive penalties for environmental breaches will be harmonised across EU Member States.</p>
<p>47 - The State must provide a streamlined and easily accessible system of small grants, information and support for the public to undertake biodiversity action on residential properties.</p>	<p>In progress – All Ireland Pollinator Plan provides information on small grants.</p>
<p>48 - The State must provide funding and infrastructural supports to local community and voluntary groups, including the settled and nomadic Traveller community, and other groups engaged in actions</p>	<p>In progress – NBAP proposes action for DRCD, DECC and NPWS to build</p>

<p>addressing biodiversity loss and restoration, e.g. managing invasive species, participating in citizen science, creating biodiverse spaces, and protecting and monitoring the health of the local environment, etc.</p>	<p>support for community biodiversity initiatives. Funding already exists through Small Recorder Grant Scheme, Community Foundation Ireland, LEADER, Local Agenda 21, Shared Island Fund, The Community Heritage Grants Scheme and Peatlands Community Engagement Scheme. Grant schemes need oversight.</p>
<p>49 - The State must continue to promote and support the All-Ireland Pollinator Plan as a way of supporting communities and individuals to contribute to biodiversity initiatives.</p>	<p>In progress via All Ireland Pollinator Plan 2021-25. NBAP proposes continued support for AIPP.</p>
<p>50 - The State must align initiatives in Rural Regeneration and Development with local, community based biodiversity activities.</p>	<p>In progress – NBAP proposes action for DRCD to support community biodiversity initiatives.</p>
<p>51 - The State must ensure the expansion of community gardens and allotments through local authority initiatives in conjunction with private landowners, in both urban and rural communities.</p>	<p>Not being implemented – Dept of Housing has outlined a potential role for Local Authorities, Botanic Gardens or Department of Agriculture from a horticultural perspective.</p>
<p>52 - The value of NGOs engaged in biodiversity should be recognised in early consultations on all relevant plans, policies and projects.</p>	<p>In progress – NGOs contribute to the biodiversity forum who provides guidance to Minister and participate in various stakeholder fora.</p>
<p>53 - NGOs engaged in biodiversity should be appropriately funded in the short, medium and long-term to undertake targeted schemes with measurable outcomes and strict accountability measures.</p>	<p>In progress via the NPWS. Additional funding will require additional resources.</p>

<p>54 - Core funding should be provided for collaborative work between NGOs and their partners.</p>	<p>In progress via DECC funding.</p>
<p>55 - The public must be encouraged to live in a way which reduces their impact on biodiversity loss. The State must develop public awareness and engagement campaigns on biodiversity and biodiversity loss, to educate people on the fundamental role of biodiversity in our lives and provide resources to inform people on what they can do in their own lives to support biodiversity.</p>	<p>In progress – Head of Engagement and Communications appointed to NPWS and a number of awareness campaigns.</p>
<p>56 - The State must develop an interactive website and app with easy-to-understand information on how the State and EU work together on environmental issues, where Ireland adheres to EU directives and the penalties of non-adherence. It should provide examples of good practice, information on what individual citizens can do, and details on who to contact for various issues. The website should highlight what collective action is occurring locally that people can participate in.</p>	<p>Not being implemented – LIFE SNaP Ireland project will deliver a consolidated data infrastructure for delivery of conservation measures on a national scale. DECC is reviewing content on the Gov.ie website to ensure all climate and environment related content is accessible and useful. EPA via social media channels is very good as well as CAROs on a local level.</p>
<p>57 - The State must establish a public information campaign to promote the benefits of buying local and seasonal produce.</p>	<p>In progress via Bord Bia promoting the use of seasonal produce. DAFM published National Strategy for Horticulture in June 2023 which includes actions to increase demand for local and seasonal produce.</p>
<p>58 - Local authorities should play a central role in informing people of the importance of biodiversity in their areas.</p>	<p>In progress via the Local Biodiversity Action Fund providing funding to LAs to carry out awareness projects.</p>
<p>59 - There should be mandatory and ongoing biodiversity training provided for any civil or public servant whose work impacts on wildlife and biodiversity.</p>	<p>In progress – NBAP proposes action for public sector staff and contractors</p>

	to have access to specialised nature skills training.
60 - The Natura 2000 biodiversity sites provide opportunities for education for local communities. A programme should be established to promote awareness of the importance and vulnerabilities of these sites.	In progress – A Natura 2000 awareness programme being undertaken as part of LIFE IP Wild Atlantic Nature (WAN) project.
61 - The National Parks and Wildlife Service (NPWS) should be funded to expand its education remit to make the public more aware of the importance and current conservation status of our protected habitats and species.	In progress - NPWS Strategic Action Plan ensures NPWS is funded to deliver on its remit.
62 - Children and young people are integral to ensuring the environment is protected. In line with the current National Strategy on Education for Sustainable Development – ESD to 2030, the Department of Children, Equality, Disability, Integration and Youth with the Department of Education, the Teaching Council, the National Council for Curriculum and Assessment, and the Teacher Education Support Service(s) should continue to engage in meaningful curriculum reform and teacher education to explicitly incorporate teaching and learning on biodiversity in early childhood, primary and post-primary curricula.	Implemented
63 - In line with the current National Strategy on Education for Sustainable Development - ESD to 2030, the Department of Further and Higher Education, Research, Innovation and Science and relevant agencies, such as the National Skills Council, Regional Skills Fora, Expert Group on Future Skills Needs, SOLAS etc., should work with further and higher education providers to develop a greater number of easily accessible further and higher education programmes, apprenticeship and community-based education related to biodiversity and environmental sciences.	In progress – NBAP proposes action for DOE, DFHERIS and NPWS to work together to align the aims of the National Strategy on Education for Sustainable Development ESD to 2030 with the NBAP.
64 - School grounds and local public amenities need to be developed as a support to a diverse and meaningful nature education. In line with this, basic biodiversity training for school staff, including maintenance and grounds staff, should be rolled out on a national basis.	In progress – action proposed in NBAP for Depts and Gov Bodies to explore biodiversity expertise and training requirements across the government to ensure appropriate expertise is available to implement the NBAP.
65 - The Green Schools Initiative should be reformed to ensure nature and biodiversity feature in the initial stages of the programme.	Not being implemented by Dept of Ed.

	<p>DECC stated that biodiversity is the 5th theme of the Green Schools programme and Food and Biodiversity is the 10th theme. The position of the theme within the programme does not impact the success of the theme at a school level. Future reviews of the programme can look to further enhance the Biodiversity and Food and biodiversity themes.</p>
<p>66 - The State must develop a research strategy to support the national and EU Biodiversity, soil and water strategies, involving all agencies, higher-education institutes and other organisations.</p>	<p>Not being implemented - refer to DECC</p>
<p>67 - The State must create, publish and maintain an integrated habitat, species and land-usage map for the island of Ireland to identify habitat loss and improvement, to support local community awareness and to inform policies and actions of state bodies and organisations.</p>	<p>Not being implemented – NPWS are seeking to progress the potential for habitat mapping with the NBDC.</p>
<p>68 - The State must increase funding to bodies and agencies, including the National Biodiversity Data Centre, local authorities, and State agencies such as the Natural History Museum and Teagasc, to carry out research related to biodiversity.</p>	<p>In progress – funding for Local Authority Action fund has increased to 3m in 2023 from 500,000 in 2019. DHLGH funds the NPDC via allocation to the Heritage Council. Objective 4 of NBAP is to enhance the evidence base for action on biodiversity.</p>
<p>69 - The State must fund a programme of work to promote and support citizen science (scientific research conducted with participation of the public) on biodiversity-related research.</p>	<p>In progress – The DPENDR stated in its response that individual policy measures and the prioritising of research rests with the relevant Minister. NPWS Small Recorder Grant scheme is in operation for citizen scientists. Funding also available through</p>

	<p>Community Foundation Ireland. NBDC also working on citizen science strategy.</p>
<p>70 - The National Biodiversity Data Centre must be established on a statutory basis, its funding secured, and its role enhanced, particularly with regard to data generation, education, community engagement and citizen science.</p>	<p>In progress – NBDC now established as a Company Limited by Guarantee (CLG) subject to oversight by Heritage Council.</p>
<p>71 - Increased funding should be made available for the research of new and emerging best practices that offer alternatives to overexploitation of natural resources.</p>	<p>In progress – Science Foundation Ireland offer research streams. EPA have a fund for research and innovation in environmental technologies.</p>
<p>72 - The State must prioritise the shift to all forms of renewable energy to achieve decarbonisation, while ensuring that these developments undertake full consideration of local biodiversity, do not negatively impact biodiversity and enhance biodiversity wherever possible.</p>	<p>In progress – CAP23 implements the carbon budgets and sectoral emissions ceilings with renewable energy playing a key role. All actions within CAP23 relating to the renewable electricity are integrated with the wider objectives of protecting biodiversity and the environment.</p> <p>NBAP proposes an action to ensure the governance framework established as part of the work on a revised Offshore Renewable Energy Development Plan (OREDPII) includes biodiversity reps to ensure marine biodiversity objectives are included in the development of the plan. Offshore Wind Delivery Taskforce has</p>

	<p>also been established to drive delivery of offshore wind renewable energy while protecting marine biodiversity.</p>
<p>73 - The State should ringfence a percentage of funds raised through all energy production for biodiversity conservation measures.</p>	<p>Not being implemented - We have carbon tax since 2009. Revenue from this over 2021-2030 will be used for targeted social welfare and initiatives to prevent fuel poverty and a just transition; fund the national retrofitting programme; incentivise farmers to farm more sustainably. Climate Action Fund also established in 2020 and will support nature-based projects and enhance biodiversity.</p>
<p>74 - Current State policy on the management of biodiversity on agricultural lands is not sufficient and requires fundamental review and change to support and incentivise farmers and landowners to protect and restore biodiversity.</p>	<p>In progress – under current CAP cycle, environment, climate and biodiversity form 3 of the 9 key objectives that must be supported under CAP funding. This had to be considered in the development of Ireland’s CAP Strategic Plan which led to significant changes in policy from Jan 2023. DAFM ACRES Cooperation project adopts results-based approach.</p>
<p>75 - The Government must ensure that Ireland’s food production is in line with commitments to the Agenda 2030 Sustainable Development Goals, the Paris Agreement, the EU Green Deal and current legal obligations to protect biodiversity, genetic resources (e.g. seed diversity) and water quality. It must phase out all environmentally harmful subsidies in the agricultural and food sector.</p>	<p>Implemented – Food Vision 2030, Ireland’s CAP Strategic Plan, Ireland’s Nitrates Action Plan, Climate Action Plan all set out policy in this area.</p>

	<p>In progress – action proposed in NBAP to implement systems to track and report expenditure allocations on measures that may adversely affect biodiversity.</p> <p>DAFM operate the Genetic Resources Grant Aid Scheme.</p>
<p>76 - Government departments, State and Semi State agencies shall ensure their work is done in a way which ensures collaborative planning, consultation in decision-making and implementation with farmers, local authorities and community groups. This must be underpinned by acknowledging that there is a need for local responses to local environments. Community led, peer-to-peer farming initiatives must maintain their community-led ethos once they are rolled out nationwide. (The Burren Programme and the BRIDE projects provide potential templates.)</p>	<p>In progress – DAFM ACRES Cooperation projects roll out locally led results-based programmes. Biodiversity Officers in LAs ensures greater presence of biodiversity skills within LAs. LAWPRO works with community groups to support work to promote better water quality and to encourage more groups to get involved. Further actions proposed under new NBAP.</p>
<p>77 - Biodiversity targets in national schemes (i.e. Common Agriculture Programme (CAP)/ Agri-Climate Rural Environment Scheme (ACRES)) must be made significantly more ambitious, detailed and focused on the medium to long-term. Funding must be increased to support this ambition.</p>	<p>In progress – Agri-environmental support other CAP have evolved in each CAP cycle. Most recent programme accounts for social, economic and environmental needs equally.</p> <p>ACRES programme has increased ambition and focuses on results and outcomes.</p> <p>Action proposed in NBAP to support incentives under results-based schemes. Further work required to</p>

<p>78 - Public incentives and payments for farmers must not restrict them in their ambition to make change for the benefit of biodiversity. All biodiversity incentives for farmers shall be results-based over the whole farm, with farmers who protect and enhance biodiversity rewarded and paid for the ecosystem services they contribute.</p>	<p>determine value of nature to ensure optimal take up of schemes.</p> <p>Implemented – changes have applied to the definition of land eligibility for direct payments since the start of 2023. Under CAP Strategic Plan, landscape features such as hedgerows, ponds etc are eligible for payment.</p> <p>ACRES adopts a hybrid approach of rewarding the delivery of ecosystem services with increasing reward for increasing quality.</p> <p>Many EIPs supported under CAP focus on results-based approaches.</p> <p>In progress – schemes such as LIFE Wild Atlantic Nature Results Based Scheme adopt a whole farm approach.</p>
<p>79 - Increased access to agri-environmental and payments-on-results schemes must be available to all farmers with commensurate funding.</p>	<p>Implemented – Funding available will depend on normal budgetary parameters and processes. 46,000 eligible applicants accepted into ACRES scheme. A further tranche is anticipated. Funding for EIPs has been greatly increased under the CAP.</p>
<p>80 - The State must support community leadership and peer-to-peer support in order to share knowledge and assist local farmers and communities to understand and replicate good biodiversity practice.</p>	<p>In progress – Community Foundation Ireland Biodiversity stream is supported by NPWS. Awareness programmes being delivered by LAs through the Local Biodiversity Action</p>

	<p>Fund. All Ireland Pollinator Plan promotes community awareness and leadership.</p>
<p>81 - The State must further subsidise and incentivise organic farming and locally grown produce. Sufficient resources must be deployed to support an ambitious implementation of Ireland’s Strategy for the Development of the Organic Sector for the period 2019 to 2025, to ensure a more supportive environment for the development of organic food and farming in Ireland and for subsequent policies relating to the medium to long-term development of the sector.</p>	<p>Implemented – DAFM has committee to increasing organic farmer land area to 330,000ha from 110,000ha b7 2027. This will be achieved through the Organic Farming Scheme, increased promotion and developing market demand.</p> <p>In progress – supported through the CAP. Proposal in NBAP to increase organic farming by 10%.</p>
<p>82 - Bord Bia must significantly increase the promotion of the organic farming sector in Ireland and actions supporting the Farm to Fork strategy.</p>	<p>Implemented – Bord Bia has appointed an organic sector manager to execute the strategy for the organic sector. Increased funding for the promotion of organic produce by Bord Bia and campaigns informed by Bord Bia’s market research.</p> <p>In progress - NBAP includes an action to ensure Origin Green programme produces measurable benefits for biodiversity.</p>
<p>83 - People must be encouraged to consume a more plant-based diet.</p>	<p>Not being implemented – a matter for public health authorities and subject to balanced nutritional requirements.</p>

	In progress partially - Dept of Housing, Local Gov and Heritage
84 - Biodiversity awareness and education training programmes need to be instigated and improved across the agriculture sector, including for farmers, advisors, policy makers, food processors and retailers.	In progress – Initiatives in place to ensure delivery of this objective including Knowledge Transfer programme under the CAP. The EIP and LIFE programmes have incorporated elements of environmental education and awareness.
85 - The Green Cert must be adapted by increasing the proportion of credits for sustainable farming. Modules should include the identification and management of nature/biodiversity features on farmland, combining latest scientific information and traditional knowledge, recognising and preserving skills built by generations of farmers.	Teagasc is responsible for the delivery of the majority of formal training courses undertaken by farmers including the delivery of Green Cert.
86 - The State must offer incentives through agri-environment schemes to farmers that achieve high soil quality status, either from the start of the monitoring programme or as a result of their employing remedial measures.	In progress – there is a proposed CAP indicator for soil quality. The proposed Soil Monitoring Directive is currently under consideration by the EU institutions and will require Member States to monitor soil health. DAFM introduced a pilot national Soil Sampling and Analysis programme in 2021. Second phase of this to commence in Q3 2023.
87 - In line with EU Soils Strategy, a National Centre for Soil Science must be established based on up-to-date technology where soil testing of physical, chemical and biological properties of soil is subsidised for farmers.	Not being implemented – many State agencies, universities and private labs are working in this area. DAFM will liaise with all involved regarding the Soil Monitoring Directive progress.

<p>88 - The State must require sufficient information on commodities' labels and menus to improve consumer understanding of the origin of their food and the impact of their choices on biodiversity/environment.</p>	<p>In progress – Ireland is awaiting proposals from the EU Commission on various food labelling initiatives. This will mostly be led by Department of Health. Origin labelling proposal may be for DAFM.</p>
<p>89 - More farms and farmers must be encouraged and rewarded for adopting the Silvopasture approach to farming – planting native deciduous trees in amongst pasture lands.</p>	<p>In progress – Measures under the draft Forestry Programme 2023-2027 encourage agroforestry. This proposal includes an establishment grant and premium payment for 10 years.</p>
<p>90 - The State must encourage use of multi-species mixtures and phase out use of monoculture grass seed mixtures.</p>	<p>In progress – in 2022 the DAFM introduced pilot measures to encourage farmers to sow multi-species seed mixtures as part of their reseeding programmes. A financial contribution was provided for the cost of the seed. Both measures were reopened with increased budget and payment rates for 2023. CAP Strategic Plan – Eco-Scheme offers support for sowing of multi species swards. ACRES scorecards reward for more diverse swards.</p>
<p>91 - The management of our freshwater systems requires immediate action. It requires increased level of ambition, increased resources for Water Framework Directive implementation (and therefore aquatic biodiversity protection and mitigation), a focus on water quality and aquatic biodiversity outcomes, clarity on roles and responsibilities and accountability for achievement of the outcomes.</p>	<p>In progress partially – NPWS Strategic Action Plan includes action for the roles and functions of public bodies in relation to biodiversity and nature to be considered by Government.</p>

<p>92 - The State must provide a single body to oversee and co-ordinate the many relevant bodies that manage, implement, and enforce legislation and policies relevant to freshwater.</p>	<p>Not being implemented – would be challenging as elements of the Water Advisory Unit, DECC, NPWS and EPA would have to merge.</p>
<p>93 - There must be urgent increases in investment by Irish Water to build new and improve existing water treatment plants to prevent the unacceptable discharge of raw or partially treated sewage into any fresh or marine waters. The current timelines and targets are inadequate.</p>	<p>Not being implemented to the extent required by the recommendation.</p>
<p>94 - The management of water catchment areas must be greatly improved, with assessments of water quality to be updated regularly to guide action on restoring water quality.</p>	<p>In progress</p>
<p>95 - Riparian buffer zones, related to agriculture, forestry, industry and extractive processes and urban development must be expanded and take into account local conditions to prevent nutrient and sediment run-off. Schemes must be put in place to incentivise landowners to protect waterways, with incremental subsidies depending on the width and quality of buffer zones.</p>	<p>In progress</p>
<p>96 - Local and other relevant authorities must be held responsible for maintaining and improving the conditions of rivers in their areas, working with each other and with State agencies, such as Office of Public Works (OPW), Coillte, the Department of Agriculture, Food and the Marine, Inland Fisheries Ireland, industry, farmers, private landowners, community groups, etc. Furthermore, local authorities and landowners must maintain the highest standards to riparian zones along the rivers in their areas.</p>	<p>Not being implemented – relates to rec 92.</p>
<p>97 - It is imperative that penalties for polluting freshwater are significantly increased and enforcement considerably improved.</p>	<p>Not being implemented.</p>
<p>98 - Farmers must have access to continuous training and up to date research in actions and land management practices that protect freshwater biodiversity.</p>	<p>In progress – LAWPRO engage with communities through meetings and events. See response under rec 84. The Agricultural Sustainability Support and Advisory Programme commenced in 2019 with 29 advisors. This has expanded to over 40 advisors who work across all counties collaborating with catchment scientists from Local Authorities Water Programme to provide farmers</p>

	<p>with advice on preventing nutrient losses to water.</p> <p>The Water EUP is the largest EIP that will promote the adoption of innovative best practice in nutrient management and address critical gap in measures to protect and restore water quality.</p>
<p>99 - The State must increase support for community groups and NGOs that are working on key projects to improve freshwater systems – e.g. support for Irish Rivers Trusts, group water schemes, angling and community groups.</p>	<p>In progress – LAWPRO has a community water development fund. Community Foundation Ireland also provides supports to community groups to work on biodiversity related projects.</p>
<p>100 - The 1945 Arterial Drainage Act is no longer fit for purpose and must be reviewed and updated in order to take proper account of the biodiversity and the climate crisis.</p>	<p>In progress – the Act will be kept under review in line with EU and national developments.</p>
<p>101 - Nature-based solutions must be included in State and community programmes to tackle flood management and should include whole of catchment area hydromorphology planning and restoration.</p>	<p>In progress – action proposed in NBAP for the OPW in coordination with other stakeholders, to enhance its knowledge and capacity with regards to Nature-based solutions for Catchment Management (MBS-CM) as part of the development of future flood relief schemes.</p>
<p>102 - The Environmental Protection Agency (EPA), supported by Inland Fisheries Ireland and an expert group, must conduct a complete analysis and survey of all catchment areas to develop a National Hydromorphology Plan.</p>	<p>In progress - DECC is supportive of the plan and the IFI has already contributed with an inventory of barriers to fish movement nationally. IFI will, subject to funding and government approval, deliver the</p>

	proposed National barriers mitigation programme.
103 - Motorway attenuation pools must be more widely used and incorporate the use of biodiverse wetlands. The forestry and extractive industries must have the highest standards of attenuation pools and sediment traps applied to their drainage activities.	In progress – DECC and DAFM?
104 - Soil sealing poses a growing threat to our waterways and hydromorphology through surface water run-off. New regulations must be developed to limit the permissible area of soil sealing around all new buildings and other developments that are subject to planning. All other surface finishes must be made of permeable surfaces.	Not being implemented.
105 - The State shall designate and effectively manage an ambitious network of Marine Protection Areas, in line with EU targets of 30% of Ireland’s Maritime Area by 2030.	In progress – LIFE MPA Ireland project (pending grant agreement) will identify MPAs and develop associated management plans.
106 - The State shall create a National Marine Biodiversity Coordination Body to have responsibility for the implementation of Marine Protected Areas, the achievement of Good Environmental Status and wider marine conservation and restoration initiatives.	In progress in the context of the Marine Protected Area Programme for Ireland for 2030.
107 - The State must implement ambitious marine conservation measures under the Marine Strategy Framework Directive to ensure ‘Good Environmental Status’ for Ireland’s seas.	In progress in the context of the Marine Protected Area Programme for Ireland for 2030.
108 - A proportion of funds raised by the State through fines and levies for activity in the marine environment must be used for the protection and restoration of marine biodiversity.	Not being implemented
109 - The State must act to ensure fish stocks in Irish waters are well managed through quotas, monitoring and no fish zones, supporting income transition for fishers who will need to change their way of earning as policies on Marine Protected Areas and offshore energy evolve, for the necessary conservation and restoration of biodiversity.	Implemented – sustainable fisheries are supported through the EU’s Common Fisheries Policy (CFP). CFP provides the framework for the long-term conservation of fish stocks around our shores and is designed to ensure the long-term sustainability of fishing in the waters around Ireland and the EU. The Seafood/Offshore Renewable Energy Working Group has developed

	<p>a “Seafood/ORE Engagement in Ireland – A summary guide” highlighting the importance of finding a balance in respect of seafood interests and the global climate emergency.</p> <p>MPAs and fisheries can coexist protecting habitats and species that require protection while allowing sustainable sea fisheries to continue.</p>
<p>110 - As a matter of urgency, the State must increase actions and legislation to considerably reduce single use plastics and microplastics to minimise pollution within its waters and along its shores.</p>	<p>In progress in terms of the research of microplastics and their impacts.</p>
<p>111 - The siting, development and construction of energy generation at sea (both pylon and floating) must be done in close collaboration with the fishing community and relevant marine biodiversity authorities. (See also recommendation 72).</p>	<p>In progress – Ireland has transitioned to a plan-led model for offshore renewable energy. The Government is developing policy and identifying areas suitable for ORE in consultation with all relevant stakeholders. This is in full compliance with maritime sectoral policies per the National Marine Planning Framework.</p>
<p>112 - All enterprise involved in marine extraction or exploration must have a strict biodiversity net gain clause attached to their development permission and must be responsible for the ongoing and future management and enhancement of the biodiversity of their sites.</p>	<p>In progress – nature restoration regulation will include measures to maintain biodiversity in the marine environment.</p> <p>DECC is currently finalising its plan for “assessment of application for Petroleum Exploration and Production Authorisations in Irish Offshore Waters for the Period to</p>

	<p>2030". This sets out the proposed approach to the issuing of petroleum authorisations in Ireland and the consideration of possible offshore exploration activities that could take place. The plan is being considered in the context of the Strategic Environmental assessment and Appropriate Assessment. Objective is to provide authorisation holders with a baseline against which they can conduct activities while ensuring the protection of the marine environment.</p>
<p>113 - An updated National Peatland Action Plan must be developed with clear, measurable, realistic and timed goals and sufficient funding to protect and restore peatlands.</p>	<p>In progress – NBAP proposes the establishment and implementation of a National Restoration Plan including measures to enhance peatland restoration.</p>
<p>114 - The cessation of turf-cutting on protected areas must be fully implemented and enforced. To facilitate a true 'just transition', the State must provide adequate financial assistance to offer viable alternatives to people currently predominantly reliant on peat for heating their homes.</p>	<p>In progress – NPWS operate Turf Cutting Compensation Scheme and the Peatland Engagement Fund. LIFE IP Wild Atlantic Nature provides incentives for improvements to areas previously cut and are piloting a retrofitting scheme. LIFE IP Peatlands and People will develop an Accelerator programme for systemic innovation focused on low-carbon and circular economies.</p>

<p>115 - The State must promote community engagement and wider awareness of the value of peatland restoration for nature and culture.</p>	<p>In progress - NPWS operate Turf Cutting Compensation Scheme and the Peatland Engagement Fund. LIFE IP Peatlands and People project will establish a Discovery Visitor Centre to engage with the public.</p>
<p>116 - The remits of Bord Na Móna and Coillte must each be reviewed to include a focus on peatland restoration and rehabilitation projects, with targeted outcomes on biodiversity conservation. The results of these outcomes must be freely available and published annually.</p>	<p>In progress through restoration action within the organisations. Coillte Nature focuses on rehabilitation. Bord na Móna Biodiversity Action Plan outlines ambition to rehabilitate peatland.</p>
<p>117 - All enterprise involved in the harnessing of renewable energy from or on all peatland must have a strict biodiversity net gain clause attached to their development permission and must be responsible for the ongoing and future management and enhancement of the biodiversity of their sites.</p>	<p>Not being implemented</p>
<p>118 - The State must develop a cross-agency response team to review practices of prescribed burning and address issues around implementation of guidance and recommendations to stop illegal burning.</p>	<p>In progress – at local scale. NBAP proposes action to establish an interdepartmental Fire Management Group with all relevant stakeholders and to develop a national fire management strategy.</p>
<p>119 - The State must encourage and incentivise peatland owners to engage in the active protection of peatland biodiversity through appropriate management and restoration activities.</p>	<p>In progress through LIFE IP Wild Atlantic Nature, CAP cooperation projects and various programmes operated by Coillte and Bord na Móna.</p>
<p>120 - There is a conflict of interest between business aims and corporate responsibility, particularly for State agencies. The State must fundamentally reassess the constitution, goals and operations of Coillte and the 1988 Forestry Act (as amended). This reassessment must ensure biodiversity protection and positive eco-system services are core objectives for Coillte, alongside providing higher quality timber, meaningful employment and benefits to the community.</p>	<p>Not being implemented – 1988 Forestry Act permits a significant reorientation of Coillte policy, already happening.</p>

	<p>Coillte Nature is dedicated to the restoration, regeneration and rehabilitation of nature across Ireland.</p>
<p>121 - State-owned woodlands should be recognised and managed as a strategic, long-term national asset for the benefit of the common good.</p>	<p>Implemented – See rec 120 and 122.</p> <p>In progress – ambition for restoration of the woodland estate within NPWS properties.</p>
<p>122 - Afforestation requires long-term goals and timelines. The State must legislate and provide funding for long-term investments in forestry, with strategic and ambitious emphasis on native woodlands. In addition, the State must ensure its afforestation strategy is not negatively impacting on biodiversity by establishing an effective monitoring system for the Forestry Programme.</p>	<p>In progress – Shared National Vision for Trees, Woods and forests in Ireland published in Sept 2022. This informed the Forestry Strategy to 2030 and the Forestry Programme for the immediate term.</p>
<p>123 - A new national strategy for the protection, maintenance, restoration and expansion of Ireland’s network of hedgerows must be developed urgently. Existing legislation and regulations regarding hedgerows must be reviewed, strengthened and fully enforced, with due regard to public safety. Sufficient results-based incentives must be made available to support all aspects of their proper management. In particular, the new CAP schemes should recognise and reward good hedgerow quality.</p>	<p>In progress through DAFM – commenced a review of the EIA regulations. Public consultation ran during Q2-3 2023.</p> <p>Under the CAP Strategic Plan, both Eco-Scheme and ACRES support the planting and maintenance for biodiversity of hedgerows, treelines and copses.</p>
<p>124 - Forests currently planted and those already felled on peatlands are a significant and historic problem. The State should remedy this issue promptly and on a significant scale.</p>	<p>In progress – Coillte Nature has a remit to regenerate and restore specified targets in relation to afforested peatland.</p> <p>Ireland’s Forest Strategy Implementation Plan (IFSIP) draft is</p>

	<p>currently undergoing a strategic environmental assessment. Within this plan are 8 strategic areas of focus and number 5 deals with legacy issues.</p>
<p>125 - The Department of Agriculture, Fisheries and the Marine must implement incentives for State, Semi State and commercial bodies to establish more nurseries for the cultivation of indigenous hedgerow species and indigenous broadleaf tree species.</p>	<p>In progress – NBAP proposes that DAFM will continue to promote and support native tree planting by LAs and other State/semi-state bodies. Further incentives may be required to achieve this. DAFM is encouraging the establishment and development of nurseries in Ireland. Draft Forestry Programme 23-27 includes innovative forest technology scheme module 2 – investment aid for the development of the forest tree nursery sector 2023.</p>
<p>126 - A significant proportion of profit earned through Coillte’s commercial activities should be ringfenced and re-invested directly back into biodiverse forestry initiatives.</p>	<p>In progress – Coillte’s Forestry Strategic Vision includes plans to increase the area of its forest estate being primarily managed for nature from 20% to 50%. Also plans to enable the investment of 100 million to create world class visitor destinations by 2030. It also plans to double the number for recreation areas to 500 nationally.</p>
<p>127 - The State must plan for appropriate felling management, including provision for continuous cover to encourage a more biodiverse and sustainable mixed forestry management model.</p>	<p>In progress – draft Forestry Programme 2023-27 includes</p>

	measures to encourage management under continuous cover forest.
128 - The Department of Agriculture, Fisheries and the Marine must ensure that licensing requires site-by-site ecological assessments to ensure that biodiversity is not negatively impacted both within and outside protected sites.	Implemented – DAFM licensing process assesses potential impacts of projects on European sites, nationally designated sites, and the wider environment.
129 - The use of pesticides in public and private forestry is to be reduced by at least 50%.	In progress – NBAP proposes that DAFM, Teagasc, Local Authorities and other relevant stakeholders will implement existing and new measures to reduce chemical pesticide use in line with EU regulatory framework for pesticides.
130 - Hedge management courses and certification should be reintroduced and it should be a requirement that all hedge cutting contractors and their employees complete such courses, and be licenced.	In progress – DAFM regulates the removal of hedgerows under the EIA Regulations which are currently under review. Teagasc provides advice and guidance in relation to the management of hedgerows in Ireland. DAFM support Teagasc’s annual hedgerow week which raises awareness and highlights appropriate management techniques.
131 - The designated sites and species are among our most important cultural, heritage, and biodiversity resources and their management needs to be sufficiently resourced to meet our EU obligations.	In progress - The NPWS Review and subsequent NPWS Strategic Action Plan ensures the NPWS Is resourced to deliver on its’ mandate.

<p>132 - The National Parks and Wildlife Service and other relevant agencies must be provided with targeted funding to provide sufficient resources and staff to manage designated sites and protect species, produce and implement management plans, enforce protections for designated sites on land and sea.</p>	<p>In progress - The NPWS Review and subsequent NPWS Strategic Action Plan ensures the NPWS is resourced to deliver on its' mandate.</p>
<p>133 - Protected sites do not exist in isolation. These ecosystems require connectivity with areas outside these sites, with links between protected sites. These connections and links need to be considered, protected and improved in local authority planning and other activities.</p>	<p>In progress – NBAP proposes the establishment and implementation of a National Restoration Plan including measures to enhance connectivity.</p>
<p>134 - The hunting open season order list must be reviewed regularly to ensure alignment with the endangered species list.</p>	<p>In progress – Review of Open Seasons Order in progress</p>
<p>135 - The management of invasive species needs to be carried out on an all-Island basis.</p>	<p>In progress – action proposed for delivery of National Invasive Species Management Plan in NBAP. Shared Island Invasive Species project will address cross border issues in relation to invasive alien species.</p>
<p>136 - Biosecurity must be increased at all points of entry to the country, in line with best international practice.</p>	<p>Implemented – DAFM has invested significantly in both infrastructure and plant health inspectors located at Ireland's main trade entry points at Dublin Port, Rosslare Port and Dublin Airport. These are the only entry points for the trade of regulated plants and plant products. There is a regional presence at other entry points for non-regulated commodities like timber and e-commerce consignments. DAFM has developed a plant health and biosecurity strategy 2020-25.</p>

	In progress - NBAP proposes that NPWS, NBDC and relevant partners develop dedicated biosecurity protocols and operating procedures for government departments by 2026. Shared Island Invasive Species project will address cross border issues in relation to invasive alien species.
137 - The State must provide funding, education and infrastructural supports to engage local community groups in appropriately managing invasive species, which negatively impact native habitats and species.	In progress - The Local Biodiversity Action Fund provides support for invasive species projects at a local level.
138 - The State must produce a multi-agency National Invasive Species Plan to manage, monitor and collate information on the distribution of invasive species across the country. This should be used for coordinated control programmes and community awareness campaigns.	In progress - action proposed for delivery of National Invasive Species Management Plan in NBAP. Shared Island Invasive Species project will address cross border issues in relation to invasive alien species.
139 - The State must introduce effective population controls regarding invasive animal species, such as non-native deer and mink.	In progress – action proposed in NBAP for NPWS, NBDC and relevant partners to implement recommended measures arising from the 2021 EPA reports 368 Prevention, Control and Eradication of Invasive Alien Species.
140 - The State must act immediately to put a timeline on the phasing out of, and eventual ban of, the sale of invasive species, e.g. Cherry Laurel.	Not being implemented
141 - Regulations for the importation of recreational wildlife, classed as invasive species, must be reviewed.	Not being implemented
142 - Schemes to incentivise people to buy native plants, shrubs and trees, including native fruiting trees and shrubs, to support garden biodiversity over non-native species should be devised and encouraged.	In progress – NBAP proposes action to promote native tree/shrub planting

	<p>by LAs and other State/semi-State bodies.</p> <p>NPWS is exploring the potential for establishing a new small native orchard scheme.</p>
<p>143 - The State must reform and update the planning and building regulations and legislation to better consider biodiversity in all new developments, with specific evidence-based and locally relevant biodiversity and environmental measures (e.g. inclusion of nesting bricks, restriction of artificial grass, green planting, corridors, sand and water, etc.).</p>	<p>Not being implemented</p>
<p>144 - Planning policy must be updated to require all new developments to have a significant net-gain for the environment and biodiversity.</p>	<p>Not being implemented</p>
<p>145 - In line with international best practice, the State must increase mandatory requirements for a percentage of green spaces that support biodiversity in urban areas.</p>	<p>In progress – The Nature Restoration Regulation provides for the restoration of urban ecosystems and no net loss of urban green space.</p>
<p>146 - Local authorities must raise the status of biodiversity to ensure that this is addressed and championed at the highest level in the organisation.</p>	<p>In progress – Heritage Council Biodiversity Officer Programme will ensure each LA employs a Biodiversity Officer to champion biodiversity issues.</p> <p>Local Biodiversity Action Fund supports projects that achieve NBAP actions.</p>
<p>147 - The National Parks and Wildlife Service (NPWS), as well as bodies prescribed in legislation with regard to biodiversity and planning, including An Taisce, should be properly funded and resourced to effectively carry out their planning and development roles.</p>	<p>In progress - the SNPWS Review and subsequent Strategic Action Plan ensures NPWS is resourced to deliver on its mandate.</p>
<p>148 - The State must utilise public spaces, such as bus shelters and roofs, to create green corridors, green walls/roofs etc., to support pollinators and promote biodiversity.</p>	<p>In progress – Nature Restoration Plan will include measures to increase urban green spaces under the proposed Nature Restoration</p>

	Regulation. Local Biodiversity Action Plans and the AIPP have action supporting pollinators and biodiversity.
149 - Authorities must incorporate ecological expertise in decision-making regarding planning.	In progress – DAFM, OPW and An Bord Pleanála have increased the number of ecologists in their staff. Ecological expertise beyond the Biodiversity Officer positions in local authorities is warranted.
150 - All Environmental Impact Assessments and Reports, and Appropriate Assessments and Natura Impact Statements must automatically be lodged with the National Biodiversity Data Centre so the data and information can be stored and made publicly accessible, with sufficient funding provided for such action.	Not being implemented
151 - Each Local Authority must include a Green Infrastructure Strategy in County/City Development Plans which includes corridors between urban and rural biodiverse habitats, creation of new biodiverse spaces, retrofitting of existing spaces and restoration of degraded biodiversity.	Not being implemented – however this will be addressed under the Nature Restoration Regulation
152 - The State must introduce tax incentives and grants for capital investment in retrofitting existing buildings with biodiverse initiatives (roof gardens, vertical gardens etc.).	Not being implemented – For consideration by DECC and DHLGH. No proposal is under consideration by the Department of Finance.
153 - The State must review An Bord Pleanála and local authority legislation and practices to take full cognisance of the Aarhus Convention, create more transparency and grant citizens greater access to information and inclusion in decision-making related to environmental issues in planning.	Not being implemented – for consideration by DECC and DHLGH
154 - As part of the new National Biodiversity Plan relevant Government departments and agencies must publish central advice for local authorities on incorporating nature based solutions and ecological features into new developments, ecosystem restoration, green infrastructure and biodiversity, addressing pollution issues (chemical, light, etc.), reinforcement and/or offsetting that can be linked to achieving local and national biodiversity objectives that would be identified in development plans and local area plans.	Not being implemented – there is no body responsible for nature-based solutions.
155 - State and Semi State agencies and bodies responsible for all major state infrastructure should prioritise the protection and restoration of biodiversity in strategic planning, with measurable goals and	In progress – NPWS Strategic Action Plan includes an action for the roles

<p>timelines that are held to account by a newly established, independent, central agency (see recommendation 24).</p>	<p>and functions of public bodies in relation to biodiversity and nature at this juncture.</p>
<p>156 - In addition to actions around the climate crisis, businesses should be required to take biodiversity into account through programmes which promote industry's engagement with biodiversity.</p>	<p>In progress - The Business for Biodiversity Ireland platform established encourages and incentivises Irish businesses to assess their impacts and dependencies on biodiversity. Corporate Sustainability Reporting Directive (CSRD) disclosure requirements on biodiversity, requests info on biodiversity metrics policies and targets.</p>
<p>157 - Ireland's tourism industry is dependent on the protection and good status of the environment and important biodiversity sites are often high amenity sites. The promotion of eco-tourism and amenities should therefore be consistent with biodiversity conservation and visitors should be managed to ensure that biodiversity is not damaged. Opportunities to include biodiverse positive areas and projects should be encouraged as an additional tool within the overall promotion of Ireland's tourism industry.</p>	<p>In progress – NPWS is engaging with Fáilte Ireland under the NPWS tourism Masterplan. NBAP proposes and action for DTCAGSM to incorporate biodiversity and ecosystem services in placemaking efforts and investment in Culture Regional infrastructure into its capital project appraisal processes.</p>
<p>158 - A scheme should be developed, similar to the Farming for Nature initiative, in which businesses can demonstrate real and substantial biodiversity credentials.</p>	<p>In progress – Business for Biodiversity Platform is establishing a Business for Biodiversity Score in 2024.</p>
<p>159 - All large businesses and financial organisations must develop a mandatory assessment and disclosure process of harmful impacts to biodiversity, with a mandated role (similar to a Health and Safety or Well-being Officer).</p>	<p>In progress – Corporate Sustainability Reporting Directive (CSRD) disclosure requirement on biodiversity, requests</p>

information on biodiversity metrics, policies and targets.

Organisations are asked to disclose whether they have a transition plan in line with the new Global Biodiversity Framework.

Appendix 3 – Submissions to the Joint Committee

Joint Committee on Environment and Climate Action,
Leinster House,
Dublin 2,
D02 XR20.

Sent by email to: climateaction@oireachtas.ie

1st November 2023

RE: An Taisce Submission on the Citizens' Assembly report on Biodiversity Loss

A Chairde,

An Taisce is writing to you to express our views in relation to the mandates of semi-State bodies around their biodiversity practices, and how these align with the recommendations made by the Citizen's Assembly on Biodiversity Loss. Our submission will relate to the mandates of Bord Na Mona, Coillte and the role of the 1945 Arterial Drainage Act.

1. Introduction

The untapped potential of Coillte and Bord na Mona's land holding for biodiversity is unprecedented in the history of the Irish State. We have the opportunity to restore public lands at scale for nature, public amenity and sustainable development. This is public land, and the Irish people should have a greater say in how it is utilised.

Coillte is the largest landowner in the Irish State, managing a landholding of 440,000 ha or 7% of Ireland's land area. It controls the vast majority of the 50.8% of Irish forestry which is in public ownership¹. Coillte owns 232,500 ha of peatlands making them the largest owner of peatland habitat in Ireland. Tens of thousands of hectares of rare, raised bog and blanket bog habitat have been drained and afforested in past decades².

¹ DAFM (2023) Forest Statistics Ireland 2023 <https://www.gov.ie/pdf/?file=https://assets.gov.ie/267876/499d9f21-751b-4d53-89d6-ed8e8e9efb97.pdf#page=null>

² NPWS (2015) A National Peatlands Strategy 2015. Dublin: National Parks & Wildlife Services. Department of Arts, Heritage and the Gaeltacht.

An Taisce is a membership-based charity | Join us at www.antaisce.org/membership

An Taisce – The National Trust for Ireland | *Protecting Ireland's heritage, safeguarding its future*

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Company Limited by Guarantee no. 12469 | Charity CHY4741 | Charity Regulator no. 20006358 | EU Transparency Register no. 473905437651-60

Directors: Philip Kearney (Chair), Trish O'Connell (Vice-Chair),
Stuart McCaul (Secretary), John Conroy (Treasurer), Hugh O'Reilly, John Sweeney, Olivia Rogers Rónán O'Brien, Finbarr Murray

Bord na Móna owns a landholding of approximately 80,000 ha³, which would formerly have supported an incredible array of wildlife across a mosaic of raised bog, blanket bog, wetlands, grasslands, woodlands and freshwater habitats. Though much has been lost since Bord Na Mona was established in the 1940s, the potential for rehabilitating both remnant habitats and degraded habitats is incredible.

2. Citizens Assembly Recommendations

The Citizens Assembly on Biodiversity Loss made a number of recommendations which relate to the mandates of semi-state bodies such as Coillte and Bord Na Mona, and the role of the 1945 Arterial Drainage Act, thereby giving the Government a strong public mandate to address this. The specific recommendations are:

- **Recommendation 100:** The 1945 Arterial Drainage Act is no longer fit for purpose and must be reviewed and updated in order to take proper account of biodiversity and the climate crisis.
- **Recommendation 116:** The remits of Bord Na Móna and Coillte must each be reviewed to include a focus on peatland restoration and rehabilitation projects, with targeted outcomes on biodiversity conservation. The results of these outcomes must be freely available and published annually.
- **Recommendation 120:** There is a conflict of interest between business aims and corporate responsibility, particularly for State agencies. The State must fundamentally reassess the constitution, goals and operations of Coillte and the 1988 Forestry Act (as amended). This reassessment must ensure biodiversity protection and positive eco-system services are core objectives for Coillte, alongside providing higher quality timber, meaningful employment and benefits to the community.
- **Recommendations 121:** State-owned woodlands should be recognised and managed as a strategic, long-term national asset for the benefit of the common good.

These recommendations are in keeping with commitments in the Programme for Government, with the commitment to:

- *"Ensure that Coillte's remit supports the delivery of climate change commitments and the protection of biodiversity".*
- *"The retention of the commercial forests of Coillte in public ownership"*

³ Bord Na Mona (2016) Bord Na Mona Biodiversity Action Plan 2016 – 2021 <https://www.bordnamona.ie/wp-content/uploads/2021/03/Biodiversity-Action-Plan-2016-2021-1.pdf>

- *“Ensure that Bord na Móna is required to take into account climate, biodiversity, and water objectives, as they deliver on their commercial mandate, through an amendment to the Turf Development Acts 1998”.*

3. Coillte Mandate

It is our view that Coillte's mandate under the 1988 Forestry Act must be reviewed to bring it in line with current environmental crises and societal expectations, with regard to water quality, biodiversity loss and the climate crisis. Part II(12) of the Forestry Act 1988 provides the following in regard to Coillte's mandate:

“12.—(1) The principal objects of the company shall be stated in its memorandum of association to be—

(a) to carry on the business of forestry and related activities on a commercial basis and in accordance with efficient silvicultural practices,

(b) to establish and carry on woodland industries,

(c) to participate with others in forestry and related activities consistent with its objects, designed to enhance the effective and profitable operation of the company, and

(d) to utilise and manage the resources available to it in a manner consistent with the above objects.”

The Programme for Government committed to ensuring that Coillte's remit supports the delivery of climate change commitments and the protection of biodiversity. However, as constituted under the Forestry Act 1988, Coillte is mandated to prioritise business interests and profit. As long as Coillte is bound by this legal mandate, any consideration of biodiversity or climate will be secondary, or incidental. Therefore, as currently legally constituted, they cannot ensure biodiversity protection and positive eco-system services are core objectives.

If Coillte is to deliver on their own vision statement of balancing the multiple objectives of climate, nature, wood, and people then it is imperative that the legal requisite to prioritise profit via a commercial enterprise is removed. The particularly intensive forestry model which Coillte has employed to date is not compatible with a strategic vision based around the delivery of public goods in the form of climate, nature, people and sustainable development including wood products.

In order to implement 1. the recommendations from the Citizens Assembly, 2. The commitments in the Programme for Government and 3. The delivery of what the Coillte Vision Statement itself strives for, then the mandate of Coillte needs to change. Economics will prevail over all other considerations for as long as Coillte is legally mandated to prioritise that.

4. Bord na Mona

Bord Na Móna was founded under the Turf Development Acts 1946 and its legal remit was established under the act and other subsequent acts between 1946 and 1998. In essence Bord Na Móna's remit has been to acquire peatlands with the objective to exploit them commercially for turf and turf products:

"General duties of the Board.

17.—(1) It shall be the duty of the Board—

(a) to produce and market turf and turf products, and

(b) to foster the production and use of turf and turf products, and

(c) to acquire bogs and other lands, and

(d) to manage, develop and work bogs and other lands vested in the Board,
and

(e) generally to do all such other things as arise out of, or are consequential upon, the duties mentioned in the preceding paragraphs of this section."

Clearly, the mandate as currently constituted is not in keeping with the Programme for Government commitment to take into account climate, biodiversity, and water objectives, nor does it align with the Citizen's Assembly recommendation that Bord na Mona also focus on peatland restoration and rehabilitation.

Ireland's peatlands are of national and international importance, and the potential benefits for biodiversity and climate from a change in mandate for Bord na Mona are immense. From a climate perspective, the Climate Change Advisory Council (CCAC)⁴ have highlighted that the rewetting of drained organic soils and peatland restoration must be a key government priority if Ireland is going to achieve a 51% reduction in net emissions in the LULUCF sector. The EPA have concluded that only modelled land use scenarios which included restoration of 70,000 ha of exploited peatlands managed to achieve net-zero in the AFOLU sector by 2050⁵.

⁴ [CCAC-AR-2023-FINAL Compressed web.pdf \(climatecouncil.ie\)](#)

⁵ [Evidence Synthesis Reports | Environmental Protection Agency \(epa.ie\)](#)

From a biodiversity perspective, Bord Na Móna's peatlands would historically have supported a vast amount of wildlife across a range of raised bog, blanket bog, wetlands, grasslands, woodlands and freshwater habitats. These sites still hold enormous potential for biodiversity under the right management conditions.

The drainage of peatlands also releases nutrients (like phosphorus and nitrogen), ammonia, dissolved carbon, and sediment into rivers and lakes impacting negatively on water quality. The restoration of healthy peatlands would help provide natural filtration processes to clean water and reduce the quantity of water entering rivers and lake⁶.

Additionally, recent flooding events have highlighted the need to hold water on the land via natural flood retention measures, and the restoration of peatlands is a critical part of that.

The co-benefits of a change of management of the land under the ownership of Bord Na Mona are clear, but in order to realise that it is imperative that their legal mandate be amended to include the prioritisation of environmental protection and conservation.

5. Arterial Drainage Maintenance 1945 and the OPW

It is a widely held view that the Arterial Drainage Act (1945) represents the thinking of a bygone era, is no longer fit for purpose, and needs to be reviewed and/or revoked. Under this Act the OPW maintains approximately 11,500 km of waterways, which involves various levels of activity, but would often involve dredging to remove silt and deepen channels, and the removal of in-stream and riparian, or bankside, vegetation. The difficulty arises in that the Arterial Drainage Act places an obligation on the OPW to maintain these waterways in a state of repair which maintains it as it was after the first management took place. Section 37(a) of the Arterial Drainage Act (1945) provides that:

"the Commissioners shall maintain the said drainage works or existing drainage works (as the case may be) in proper repair and effective condition".

This results in, in many instances, the requirements of the Arterial Drainage Act directly conflicting with the requirements of the Habitats Directive and the Water Framework Directive, with the OPW compelled to maintain the waterways they drain in a specific time-stamped condition, without due consideration of the impact on Natura 2000 sites and species, and Water Framework Directive obligations. Additionally, while arterial drainage may effectively keep agricultural land drained and productive, it is often likely to just move the flooding problem further downstream to our villages, towns and cities⁷. From a climate resilience perspective, it is critical that we look to slow the flow and implement natural flood measures, which in many cases is the precise opposite of what the arterial drainage maintenance programme delivers, its whole premise being to move water off the land and into our streams and rivers as quickly as possible.

⁶ [Research Report: Optimising Water Quality Returns from Peatland Management while Delivering Co-benefits for Biodiversity and Climate - An Fóram Uisce \(thewaterforum.ie\)](#)

⁷ [Floods, Dredging, and River Changes. \(sepa.org.uk\)](#)

Additionally, while the requirements of the Nature Restoration Law remain to be finalised, it may include a provision relating to the adjustment of the water table on certain drained organic soils, which again may conflict with that specific obligation for 'proper repair' under the Arterial Drainage Act. The climate implications of maintaining drained organic soils in their current drained state must also be considered as an additional imperative to reconsider the Arterial Drainage Act 'effective repair' obligation.

As such, the review, or revocation, of the Arterial Drainage Act is a key lever to better protecting biodiversity and water quality, and to better align the actions of the State, and requirements under national law, with our EU legal obligations.

6. Recommendations

An Taisce wholly supports the recommendations of the Citizens Assembly on Biodiversity Loss in regard to the mandate of semi-state bodies, and the review of the Arterial Drainage Act. Our recommendations are that the Government move quickly to:

1. Amend the legal mandates conferred on Coillte by the Forestry Act 1988, Bord na Móna by the Turf Development Acts 1946-1998 and the OPW under the Arterial Drainage Acts 1945-1995, ensuring that the protection and restoration of the environment and climate action are core obligations; and place the government's commitment to retain public land in public ownership on a legal footing.
2. Issue new letters of expectation from government to the boards of Coillte and Bord Na Móna signalling the imminent reform of their legal mandates and directing them to not enter into any legal agreements which would undermine public ownership or public access to their landholdings.

Le meas,

A handwritten signature in black ink, appearing to read 'Elaine McGoff', written in a cursive style.

Elaine McGoff, PhD
Head of Advocacy, An Taisce- The National Trust for Ireland.



10 November 2023

Deputy Brian Leddin T.D.,
Cathaoirleach,
Joint Committee on Environment and Climate Action,
Leinster House,
Dublin 2

Ref: CCA-I-2023-568

Dear Deputy Leddin,

I refer to your recent request for material and I am pleased to have the opportunity to contribute to the considerations of the Joint Committee on Environment and Climate Action regarding the recommendations of the Citizens' Assembly report on Biodiversity Loss. I recognize the important role my Department, working with our farmers, fishers, foresters and other stakeholders, can play in addressing the biodiversity loss that has occurred over recent decades.

You specifically requested information in relation to the mandates of semi-state bodies under the aegis of my Department, around their biodiversity practices, and how these align with the recommendations made by the Citizen's Assembly. All semi-state bodies are obliged to comply with climate, biodiversity, water and other environmental objectives as set out in the Programme for Government, Government strategy and policy documents, and Irish and EU legislation.

State Agencies play crucial roles in supporting my Department to shape Ireland's agriculture, food and marine sectors and in promoting sustainable practices and economic growth within these industries. Twelve State Agencies fall under the remit of my Department and those considered relevant to the Citizen's Assembly report on Biodiversity Loss are Coillte, Bord Bia, Teagasc and the Marine Institute. For clarification, these agencies are summarised here:

Coillte is a commercial state-owned company in Ireland, established under the Forestry Act 1988 and responsible for the management and development of publicly owned forests and land in Ireland. Coillte operates as a commercial entity, generating revenue from its forestry and land-based activities, such as timber production and recreational facilities, with the goal of maximising returns to the Irish State. It differs from traditional state agencies in that it functions as a commercial enterprise with a focus on financial sustainability. However, Coillte is also obliged to comply with climate, biodiversity, water and other environmental objectives as set out in the Programme for Government, government strategy and policy documents, and Irish and EU legislation.

Bord Bia's primary mission is to promote and market Irish food products and to support Irish food producers, exporters and the agri-food industry. Bord Bia plays a key role in advancing the interests of the Irish agri-food sector and promoting Irish food products on the global stage.

The primary purpose of **Teagasc** is to provide research, innovation, and advice to support sustainable agriculture and the agri-food sector in Ireland. Teagasc plays a significant role in the development and improvement of Irish agriculture and food production, working in collaboration with government departments and other stakeholders in the sector.

The **Marine Institute** is a state agency responsible for marine research, development and environmental management. As a state agency, it plays a crucial role in advancing Ireland's interests in the marine sector and supporting the sustainable use of marine resources.

State Agencies roles in delivering action for biodiversity

Coillte's mandate is delivered under instruction from Government as set out in the Shareholder Letter of Expectation. This letter of expectation sets out specific objectives on climate action, biodiversity and bio-economy linked to Irish and EU policy and legislation including ambitious increases in the lands managed primarily for nature. Further to the Letter of Expectation, Coillte is subject to robust assessment processes for felling, afforestation and road licences, which take into account environmental impacts.

Coillte's Strategic Vision, announced in April 2022, outlines Coillte's future direction and highlights their intended contribution to national climate, biodiversity objectives and recreational objectives. It contains 11 ambitions across the four strategic pillars of Climate, Nature, Wood and People, including the following:

- Coillte aims to grow 100,000 hectares of new forests by 2050, supporting the delivery of one-third of Ireland's afforestation target.
- Coillte's afforestation ambition is to enable the creation of new forests providing a carbon sink of 18m tonnes of CO₂. Coillte will also manage its existing forest estate to capture an additional 10m tonnes of CO₂ by 2050.
- Coillte plans to produce 25 million m³ of certified Irish timber, helping Ireland achieve its housing ambition of 300,000 new homes by 2030. It will also promote the increased use of wood products to raise the level of timber homes from 20% to 80% by 2050.
- Coillte intends to increase the area of its forest estate being managed primarily for nature from 20% to 50% in the long term, by enhancing and restoring biodiversity and planting new forests, half of which will be native woodlands.
- Coillte plans to enable the investment of €100 million to create world class visitor destinations by 2030. In addition, it will double the number of recreation areas nationally to 500, to support local communities and the Irish tourism sector.
- New strategic vision will be underpinned by Coillte's commercially successful business and aims to enable the creation of 1,200 direct and indirect jobs in rural communities to support the just transition to a low carbon economy in Ireland.

A detailed draft Forest Estate Strategic Land Use Plan (FESLUP) identifying a series of 'Objectives' under each of the four pillars provides further detail to underpin the 11 ambitions of the Strategic Vision. Coillte have undertaken both Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) on the FESLUP. The FESLUP accompanied by the SEA and AA reports was made available on the Coillte website for a six-week period of public consultation from Thursday 14th September to Wednesday 26th October 2023. Following completion of this consultation and adoption of the FESLUP, shorter term geographically focused Forest Estate Strategic Implementation Plans (SIPs) will be developed and published.

Origin Green is the vehicle of the contribution of Bord Bia to biodiversity. The further development of Origin Green is an action contained within the agri food strategy *Food Vision 2030* (Mission 1: Goal 7). Climate and biodiversity are core pillars of Bord Bia's Origin Green programme with actions and input both at primary producer level - farmer sustainability assessments – and at company level – incorporation of biodiversity targets in sustainability plans. The Origin Green programme focuses on the benefits of biodiversity and stable climate to food production and food security.

Education and awareness have a substantial emphasis within the Origin Green programme. At farmer (primary) level Bord Bia has hosted several 'Pathways to Biodiversity' webinars, focusing, among other factors, on how Bord Bia are seeking to improve farmland biodiversity by developing and testing a whole-farm pollinator scoring system to identify what management practices on Irish farmland benefit pollinators. In addition, Bord Bia have provided online training course on Biodiversity for Origin Green farm members, detailing the importance of maintaining farmland biodiversity and the practical actions farmers can take.

Teagasc has engaged directly with this Committee in response to Recommendations related to their remit. The principle functions of Teagasc are outlined in the Agriculture (Research, Training and Advice) Act 1988. The mandate gives Teagasc responsibility for meeting the knowledge and technology needs of the entire food chain and the authority to integrate research, advice and education services to deliver the innovation support necessary to add value to Ireland's agri-food sector, which includes biodiversity and climate research, actions and advise. This is reflected specifically in Goal 2 of Teagasc's four key goals – *Support sustainable farming and the environment* and the Statement of Strategy 2021-2024 which emphasises that environmental challenges are the biggest issues facing farmers and the agriculture industry and which outlines the actions planned by the organisation to assist farmers and the wider sector to adapt and respond to these challenges whilst maintaining the three pillars of sustainability – economic, social and environmental.

The Marine Institute (MI) collaborates closely with partner agencies, Bord Iascaigh Mhara (BIM), Inland Fisheries Ireland (IFI) and Sea Fisheries Protection Authority (SFPA), Environmental Protection Agency (EPA), and National Parks and Wildlife Service (NPWS) to optimise delivery of common goals in support of maintaining good environmental status of our oceans. The MI leverage their knowledge base, and extensive monitoring and time-series data to develop baselines that can be used to ensure that seafood production is sustainable and does not cause ecological harm.

Many of the recommendations for the marine environment proposed through the Citizens Assembly on Biodiversity Loss are being delivered by the MI in collaboration with the Department of Housing, Local Government and Heritage (DHLGH) and my Department. The MI's work in research, data management and stakeholder engagement contribute to the delivery of Ireland's Marine Strategy, restoration activities through the EMFAF marine biodiversity scheme, Common Fisheries Policy and Designated Maritime Area Plans, amongst others. Such action contributes directly and indirectly to delivery of Citizens Assembly Recommendations.

Alignment with Recommendations from the Citizens Assembly on Biodiversity Loss

The work of the agencies above contributes to the delivery of the recommendations from the Citizens Assembly either directly or indirectly. All agencies are required to be cognisant of and contribute to a wide variety of EU and Irish legislation and policies for biodiversity (and climate), as relevant to their thematic areas. This takes the form of research, data gathering and management, education and awareness, compliance, and implementation.

Some direct examples of delivery include Recommendation 128. As referred to above, Coillte is subject to robust assessment processes for felling, afforestation and road licences, which take into account environmental impacts. All forestry licence applications undergo a comprehensive process to ensure that landscape, environment, and the archaeological heritage are protected. In addition, National Parks and Wildlife Service (NPWS) must be consulted in relation to forestry development in European Special Areas of Conservation and Special Protected Areas, designated under the EU Birds and Habitats Directives, and no such development may proceed without their agreement. Under Statutory Instrument No. 477/2011 - European Communities (Birds and Natural Habitats) Regulations 2011, Coillte as a public authority must comply with the Bird and Habitats Directives.

In relation to Recommendation 82 – Bord Bia is actively supporting and promoting the organic farming sector. Bord Bia have developed a targeted lead generation and promotional activity plan for organics based on research and sectoral investigation. In addition, Bord Bia hosted the National Organic awards in 2022 in conjunction with my Department. The awards are held every two years and highlight and celebrate the achievements of Irish organic food and drink producers.

Recommendation 85 calls for modification of the Green Cert to increase the focus on sustainable farming. The Green Cert is a generic term applied to awards which meet the requirements of 'qualified farmer' for the purposes of all Revenue and DAFM schemes. Within Teagasc education the most common way in which a student will achieve their Green Cert is through successful completion of a Level 6 Certificate in Agriculture course. Teagasc have increased the level and depth of teaching and learning in sustainable farming and biodiversity in recent years. Since 2018, a new 10 credit mandatory module Sustainable Farming & the Environment is included in the 50 credit Level 6 Specific purpose in farming qualification.

In cases where new actions or commitments are required, the agencies referenced in this submission have the potential to take significant positions in meeting requirements mandated by Government. For example, Recommendation 106. A National Marine


Biodiversity Coordination Body does not yet exist. However, the Marine Institute is in position to provide support should such a body be established.

Conclusion

Relevant state agencies under the aegis of my Department are delivering actions in line with the Recommendations of the Citizen’s Assembly on Biodiversity Loss. The work of these agencies reflects the overarching commitment of the Irish Government to act to address the real and present threats to society as a result of the biodiversity crisis.

I am sure that all the state bodies under the aegis of my Department would be happy to provide further details to the Committee on Environment and Climate Action as deemed appropriate around their biodiversity practices, and how these align with the recommendations made by the Citizen’s Assembly.

Yours sincerely,



Charlie McConalogue TD,

Minister for Agriculture, Food and the Marine



Our ref: **231903/MIN**

9th October 2023

Mr. Brian Leddin, T.D.
climateaction@oireachtas.ie

Re: Recommendations of the Climate Change Advisory Council's 2022 Report

Dear Brian,

I am writing to you in response to your correspondence dated 21st September 2023 in relation to the recommendations of the Climate Change Advisory Council's (CCAC) 2022 Report.

Below, you will find our response on the recommendations from the 2022 Report on which you have sought the views of the Department of Enterprise, Trade and Employment (DETE).

As you are aware, under the sectoral emissions ceilings, my Department has responsibility to reduce industry on-site emissions (made up of manufacturing combustion emissions and industrial processes emission) by 20% by 2025 and 35% by 2030, and alongside the Department of Environment, Climate and Communications (DECC), we have also committed to reducing emissions from the heating of commercial buildings by 20% by 2025 and 45% by 2030.

I and my Department are committed to our Programme for Government objective to reduce emissions by 51% across all sectors of the economy by 2030 and to become net zero by 2050, in line with our EU targets for net zero by 2050 across all member countries. Annual Climate Action Plans are developed to map out our decarbonisation strategies for industry, the commercial built environment and other areas of the economy, with quarterly objectives for each government department and public body in delivering on our national goals. By maintaining and revisiting our Climate Actions Plan annually, the plan remains dynamic and

ambitious; allowing us to reflect on the recommendations of the CCAC, progress in implementing previously designed measures, and changes in the national and international context.

Historically industrial emissions have aligned broadly with economic trends. However, there is growing evidence of a decoupling of industrial emissions from economic growth with emissions having decreased by 7.1% in 2022 relative to 2021 and overall, by 9.1% relative to 2018. Fuel switching from more carbon intensive oil and coal to lower carbon natural gas has been one of the drivers for the reduction to date. A further significant shift to electrification and zero carbon fuels will be needed to deliver on the national targets.

Please note that the CCAC report groups recommendations for the residential and commercial & public sector built environment. Recommendations 7.1., 7.2. and 7.8. fall outside the remit of my Department as they relate to district heating and the retrofitting of residential housing and the state's social housing stock. Responses to these recommendations should be received from my Ministerial colleagues.

Recommendation 7.3. The Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy, which was published in July 2022, sets out a series of 6 national principles to inform and guide decisions on future data centre development. It also requires that data centre developments are flexible and are built as efficiently as possible, both to use renewable resources in their operations and to support wider decarbonisation, as well as supporting the communities around them.

The Government encourages the use of waste resources, such as heat, from data centres as another way to support the circular economy objectives and to support the decarbonisation requirements of the economy as a whole, indeed, the district heating scheme in Tallaght using waste heat from a data centre serves as an example internationally in this regard. The provisions in the recently agreed Energy Efficiency Directive will further identify and incentivise such approaches.

The availability of proximate heating needs is a key factor in whether waste heat recovery systems increase or decrease the efficiency of data centres. Therefore, a mandatory obligation on data centres to install, or particularly to retrofit, heat export ability would have to have

consideration of this and may not be a suitable efficiency mechanism in all locations. My Department would strongly encourage the use of heat export mechanisms wherever it is suitable for the location, and understand that the transposition of the Energy Efficiency Directive, which has specific provisions related to data centre efficiency, provides officials in DECC an opportunity to consider this objective further.

Recommendation 7.5. This year a Commercial Built Environment roadmap is being developed which is led by my Department and the Department of the Environment, Climate and Communications, supported by other relevant Departments. It will set out the key policy interventions to achieve the objectives set out for decarbonising our commercial building stock. In order to support businesses and commercial property owners on their decarbonisation journey the roadmap will also set out the standards, regulations and timelines that will drive the necessary changes in heating systems, minimum equipment efficiencies, and smart building operational and monitoring strategies, non-domestic retrofit schemes and technologies required to meet the national targets. The roadmap is set to publish in Q4 2023.

The Non-Domestic Microgeneration Scheme provided by the SEAI has now been amended to extend supports, with new funding ranges from €2,700 to €162,600, to support an even wider range of businesses to switch to solar. The updated scheme provides tiered grant supports for Solar PV installation up to 1MW capacity. This scheme helps towards the installation of solar PV for your business, farm, school, community centres, or other non-profit organisation and has high potential in particular for large site firms. Solar PV technology reduces commercial electricity costs and increases security of supply, while enhancing a positive sustainability image. The increase capacity of Solar PV available under this grant ensures a wider range of businesses can now invest in renewable energy.

Recommendation 7.7. The Growth and Sustainability Loan Scheme is a long-term loan guarantee scheme jointly developed by the Department of Enterprise, Trade and Employment and the Department of Agriculture, Food and the Marine. The scheme is underpinned by resources from the European Investment Bank Group (EIBG) and delivered by the SBCI. The €500 million Growth and Sustainability Loan Scheme launched on 19th September with the first on lender Bank of Ireland provides longer-term lending to SMEs, including farmers and fishers and small mid-caps. Loans of between €25,000 and €3 million, with terms of up to 10 years and attractive terms and conditions, are available through the scheme to eligible SMEs

through participating finance providers, with loans of up to €500,000 available unsecured. The scheme targets a minimum of 30% of the lending volume towards environmental sustainability purposes with the aim of encouraging SMEs to take positive actions in support of the climate change agenda. Up to 70% of lending is for strategic investments with a view to increasing productivity and competitiveness and thus underpinning future business sustainability and growth. Loans for climate action and environmental sustainability purposes will also benefit from an additional interest rate discount. A number of other lenders, including non-bank lenders, are expected to take part in the scheme in the coming weeks. The Growth and Sustainability Loan Scheme will operate until 30 June 2026 or until the scheme has been fully subscribed (whichever is earlier).

Recommendation 8.1. Our Industrial Roadmap is to be published in Q4 2023 and will set out the key policy interventions to achieve the objectives set out for decarbonising heat use in manufacturing through energy efficiency and the displacement of fossil fuels. The roadmap will include a pathway to the electrification of low temperature heat, and the prioritisation of decarbonised gas for use in high temperature heating. The roadmap will develop actions for inclusion in the next Climate Action Plan and will address the three carbon budget periods up to 2035. The roadmap will be based on the recommendations of the SEAI National Heat Study including issues identified around capital expenditure for decarbonisation infrastructure, decarbonisation investment payback periods, and grid infrastructure for electricity and renewable gas supply.

As part of developing the roadmap, an Industry working group was set up to identify the opportunities at present, the technology in the pipeline to 2035, regional strategies & infrastructure rollouts in industry clusters and key policy requirements to best utilise resources and deliver on our decarbonisation targets. The workgroup was focused into three main focal areas – Electrification, Energy Efficiency and Biomass. This allowed for concentrated groups for each decarbonisation pathway.

Biomethane as a renewable fuel will also be included in the Roadmap based on the approach of the National Biomethane Strategy currently being developed by the Department of Agriculture. Biomethane will play an important role particularly in decarbonising difficult-to-abate high-temperature industry and manufacturing processes.

Recommendation 8.2. DETE agrees that we will need to do more to empower our SME base to address the green transition. The Department currently assists SME's in terms of knowledge sharing, practical guidance, and signposting state agency support through our Climate Toolkit 4 Business. The toolkit is an important resource targeted towards SMEs and micro-enterprises to encourage their first steps towards net zero. It promotes an understanding of their current carbon footprint and provides advice, and information on grants and other resources available from the LEOs, EI, SEAI, Irish Water, EPA, IDA and others. The simplified carbon calculator generates an estimated carbon footprint for the user and produces a plan of tailored actions recommended in response to the data provided. It is particularly useful for businesses that do not yet have a sophisticated understanding of their carbon emissions or the steps they should consider to reduce their emissions.

The Green Transition Fund provides supports to SME's at the start of their decarbonisation journey through the Climate Action Voucher and GreenStart which both aim to subsidise costs for development of a sustainability/decarbonisation plan for the company and to support assessments on cost and resource reduction targets. Though Green Plus and the Capital Investment for decarbonisation technologies and smart energy metering, we are supporting companies to advance their sustainability plans and invest in the infrastructure to deliver on them.

The Sustainable Energy Authority of Ireland also offers a range of supports that can help businesses decarbonise their buildings and operations and make them more energy efficient. These supports range from tax incentives, vouchers, training, and grants. DETE is working closely with the SEAI in workgroups and consultations with stakeholders in industry to identify novel technologies, best practices and optimal decarbonisation pathways for specific company types. In particular, design of a commercial building decarbonisation support is under consideration. DETE and DECC, and their agencies, continue to collaborate on the development of CAP24, and the measures required to supports SMEs in its implementation, to ensure further development of actions towards decarbonisation.

Recommendation 8.3. It is recommended to specify low-carbon construction methods and low-carbon cement material as far as practicable for publicly procured or supported construction projects, and that this be mandatory.

This action, set out in Climate Action Plan 2023 as part of the Public Sector Mandate, is being progressed at present including through the Cement and Construction Sector Decarbonisation Working Group. The aim is to ensure that public procurement can play a significant role in the wider adoption of low carbon building materials and practices. DETE launched a procurement process in March 2023 to secure expert Services to Support the “Development of an Appropriate Procurement Criterion to Ensure the Reduction of Embodied Carbon in the Cement or Concrete Procured in Construction Projects by Public Bodies.” The appointed consultants are finalising their report at present with the aim of submitting it to the Department in early October. The report findings will be introduced to relevant stakeholders in mid-October. Recommendations are expected to be brought to Government afterwards.

Recommendation 8.4. The Government is committed to increasing the use of timber in construction, and as a replacement to cement.

DAFM and DECC are leading work under a Timber Working Group which will focus on the area of timber in construction projects, including the use and regulatory framework for Cross-Laminated Timber (CLT). The Working Group aim will be to create the conditions to increase the use of timber in construction; examine regulatory challenges (including building and fire regulations), standards and compliance; and maximise the use of home-grown timber in construction whilst ensuring the highest degree of building safety and property protection. The Department of Enterprise, Trade and Employment sits on this working group and will ensure alignment with the ongoing workplan and objectives of the Cement and Construction Sector Decarbonisation Working Group.

Recommendation 8.5. Government agrees that greater efforts to reduce the emissions intensity of cement and concrete used in construction are required. The use of innovative lower carbon cements and concretes, for example, by replacing clinker with lower carbon cementitious materials, can be further facilitated in both national and European standards. As described above, DETE have successfully procured Expert Services to Support Development of an Appropriate Procurement Criterion to Ensure the Reduction of Embodied Carbon in the Cement or Concrete Procured in Construction Projects by Public Bodies, and this work will inform how the State can lead by example in this regard. Separately, Enterprise Ireland is engaged with companies in the cement sector in order to facilitate ongoing efforts to

decarbonise their products and invest in the innovations or process redesigns that can reduce the carbon emissions associated with their product in future.

The transition to a low carbon and sustainable economy is a key strategic priority for the Department, as set out in the Department's latest Statement of Strategy. The Department's primary focus is necessarily on the measures required to decarbonise industry and our broader enterprise base, in order to achieve the ambitious carbon budgets and sectoral emissions ceilings, as specified in the Climate Action and Low Carbon Development (Amendment) Act 2021 and agreed by Government. We will shortly publish two detailed Roadmaps in this regard.

However, the Department is taking an increasingly holistic view of the green transition and is committed to expanding its ambitions in areas such as the bioeconomy, the circular economy, and biodiversity as the green transition becomes more embedded in enterprise policy and the activities of the Department. In this light, the Department takes a keen interest in the Council's recommendations and ensuring that our future policy development and implementation plans incorporate the recommendations at its core.

I trust that the attached is of some assistance to the Committee and its work. My officials and I remain available to support the Committee on matters that come within my Department's responsibility.

Yours sincerely,



Simon Coveney T.D.

Minister for Enterprise, Trade and Employment

An Roinn Caiteachais Phoiblí
Sheachadadh PFN agus Athchóirithe
Department of Public Expenditure
NDP Delivery and Reform



Ref: CCA-I-2023-575

Ms Gina Long
Clerk to the Committee
Joint Committee on Environment and Climate Action
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By email: climateaction@oireachtas.ie

14 November 2023

Dear Gina,

I refer to your letter of 3 November 2023, in which you set out a number of queries relating to my Department arising following the meeting of the Oireachtas Joint Committee on Environment and Climate Action on 24 October.

Below please find my Department's response to each of the queries raised. Please note that the response to query 4 has been provided by colleagues in the Department of Finance, who have responsibility for this area along with the NTMA.

Q1 The Committee heard that green budgeting is included in budget documentation and that your Department tags current expenditure to see how much of it is environmentally sustainable. Could you clarify further how and to what extent such measures ensure positive outcomes for biodiversity? Are further measures going to be taken in future to prioritise biodiversity in this way?

Ireland committed to the implementation of a series of progressive green budgeting reforms beginning with Budget 2019. The purpose of these reforms is to better embed climate and environmental goals within the budgetary process, with a view to improving outcomes. As part of this, DPENDR has tracked and reported on Climate Favourable expenditure each year

since Budget 2019, the output of which is included in Annex 8 of the Revised Estimates for the Public Service (REV).

To date, green expenditure tagging in the REV has focussed primarily on expenditure to support climate change mitigation and adaptation outcomes. This year, the Department's Climate Coordination Unit has begun revising the green budget tagging process, planning for several improvements and methodological changes in the next iteration of the REV, to be published in December 2023. These include the identification of both favourable and potentially unfavourable expenditure and consideration of six climate and environmental criteria (mitigation, adaptation, pollution, water quality, circular economy, biodiversity) in line with the EU Taxonomy for Sustainable Activities.

While this expansion of green budgeting is an important step towards enhancing the level of transparency and accountability about how public resources are being targeted to achieve our climate and environmental goals, responsibility for the implementation of policies and measures, and delivery of the intended outcomes, remains with the relevant Department with policy responsibility for a given policy or measure.

Q2 The Committee notes this year's budget included the establishment of a €3 billion climate fund that will begin in 2026 and that a €2 billion budget was set aside in the summer economic statement that would cover nature restoration. Members note that the statement provides that €2.25 billion from windfall receipts from 2024-26 will be set aside for delivery of critical infrastructure and that a contribution would go to the existing climate action fund for nature restoration and other Government priorities. The Committee would like clarification as to how much of that €2.25 billion will be set aside for the climate action fund and specifically nature restoration?

As the Committee has noted, an additional €2.25 billion, from windfall corporation tax receipts will be made available over the period 2024-2026 to boost delivery of critical capital infrastructure projects and make a contribution to the existing Climate Action Fund (CAF). As set out in the Budget 2024 Expenditure Report, this Department will be reviewing the sectoral capital allocations to be provided as part of the National Development Plan (NDP) for 2026 to 2028, to allow for five year capital ceilings. The additional allocation of €2.25bn will be dealt with in the context of this work. It is expected that this work will commence shortly and will progress into 2024.

The Climate Action Fund (CAF) was established to provide assistance and financial support to projects which will help Ireland achieve its climate and energy targets. The Department of the Environment, Climate and Communications (DECC) is responsible for the CAF's implementation and the management of the CAF is a matter for DECC.

In addition and separate to the €2.25 billion allocation outlined above, the Minister for Finance announced in Budget 2024 that the Government will invest a portion of the windfall corporate taxes in an Infrastructure, Climate and Nature Fund with the intention to operate the fund in a counter cyclical manner in times of fiscal and economic stress to provide resources for capital investment.

The resources of Infrastructure, Climate & Nature Fund will, amongst other uses, help to support climate related initiatives over the medium and long term. However, there is a need for additional investment to assist Ireland deal with the transition to climate neutrality. In recognition of this, it is proposed that a second avenue of access to the Infrastructure, Climate & Nature Fund, be developed, specifically related to the achievement of climate goals. The proposition is that separate to the drawdown criteria linked to economic downturn in order to support the NDP, up to 22.5% of the balance of the Infrastructure, Climate & Nature Fund may be drawn down to support climate and nature related capital projects in any given year from 2026, up to a cumulative maximum of €3.15 billion by 2030.

Q3 The Committee notes that funding available now is not being spent until 2026 due to the economy being “at capacity”. As such, investment in certain areas is not possible and could drive further inflation. The Committee seeks further clarity on this.

Budget 2024 provides additional capital of €900 million in 2024 relative to that provided in 2023. This will bring total core capital investment in 2024 to €12.6 billion. This represents an increase of approximately 8 per cent, in line with the NDP. Additional capital expenditure of €250 million is being made available for 2024 from windfall exchequer receipts, to be allocated to critical infrastructure projects that are at an advanced stage as well as to the existing Climate Action Fund.

A further €2 billion from windfall exchequer receipts is being made available across 2025 (€750 million) and 2026 (€1.25 billion). Recognising the capacity constraints in the economy, it is intended that the additional funding will be targeted at projects that are ready for development.

Estimated capital expenditure as a percentage of GNI* is anticipated to be 4.1% in 2023 and 4.3% in 2024. These rates are below the projections of 4.9% and 5.1% set out in the National Development Plan (NDP), in light of the very strong performance of the economy in the recent past which has led to the significant growth in GNI* since the publication of the NDP back in 2021. As a percentage of national income, annual capital investment is now among the largest in the EU with a commitment to further increase investment in capital projects and programmes over the lifetime of the NDP.

All available evidence in 2023 indicates that nominal NDP allocations as set out in the NDP are sufficient to deliver a wide range of projects. As of 2023, Departments still has excess funding overall to enable delivery on the NDP. In addition, Departments can carryover up to ten per cent of their capital allocations into the following year, where there has been an underspend. Almost €820 million was carried forward from 2021 into 2022 and almost €690 million carried forward from 2022 into 2023 (as the funds were not spent in the years allocated). This indicates that the nominal amounts provided for in the NDP in 2021 remains sufficient to allow for the delivery of projects that can proceed even with the inflation seen in the past 2 years.

In terms of ensuring that these funds can be used efficiently and full delivery of the NDP can be managed, the Minister for Public Expenditure, NDP Delivery and Reform presented to Government a package of significant actions aimed at enhancing project delivery for the NDP in March 2023. Among these actions, the Minister committed to an independent evaluation

of investment priorities and capacity of the NDP, focusing on the capacity to deliver current Government priorities, to utilise sectoral capital allocations and to estimate the impact of the NDP on key economic indicators. The ESRI was commissioned to carry out this evaluation in April 2023. It is anticipated that the report will be published during Q4 this year. On foot of the ESRI report, this Department will commence the process of agreeing sectoral NDP allocations out to 2028, with a view to the publication of the revised NDP sectoral allocations in 2024.

Q4 The Committee notes that the existing green bond is not fully taxonomy compliant and questioned whether the Department can redirect the non-compliant element of it to nature and biodiversity

The proceeds from the sale of Irish Sovereign Green Bonds (ISGBs) are allocated to climate-related expenditures which are set out in the Revised Estimates Volume for Public Services annually and capital expenditures by Uisce Eireann. The allocations, which are decided by the Irish Sovereign Green Bond Working Group which is chaired by the Department of Finance, are aligned with the International Capital Markets Association's (ICMA) Green Bond Principles and are compliance-reviewed by Sustainalytics, a global leader in this field. While the EU Taxonomy is still an emerging standard in green bond markets using both ICMA's principles and Sustainalytics for compliance review are market standards for sovereign green bonds.

ISGB allocations are made after the expenditures have occurred and they do not drive the expenditure decisions. Therefore the ISGB programme does not override any of the Government's related policy decisions.

Q5 The Committee heard that significant research must be undertaken before we reach a point where all the details are available in relation to benefits and costs for actions and measures taken in relation to biodiversity. This will adequately inform any future rewards scheme for landowners. However, Members queried whether the State could move on more obvious areas where risks around payments could be taken in order to move forward with restoration. For example, Ireland has one of the lowest areas of woodland, planting native woodland could be one area where payments could be made without additional research. The Committee acknowledges that your Department is responsible for allocation of funds and this is dependent on the benefit, be it political, social or environmental. The Committee therefore seeks clarity as to how the Department intends to assess the allocation of funds for biodiversity in the shorter term in spite of gaps in the current data available.

It is a matter for the relevant Departments to decide on policy priorities in terms of biodiversity and any other policy area. This Department will consider the allocation of funds to biodiversity as it considers the allocation to all policy areas. It is a matter for the Department of Housing, Local Government and Heritage to make the case for biodiversity funding as part of the overall allocation to the Department and specifically to the Heritage Programme. In this regard I would note that the overall allocation to the Heritage Programme increased by 23% in 2023 and is set to increase further in 2024.

Q6 Has the Department published anything with respect to the biodiversity impact as a result of carbon tax revenues? Could a short note on this be provided to the Committee if not?

The Department publishes details of allocations made on an annual basis from the projected proceeds of the carbon tax revenue increases on Budget Day, with the most recent publication in respect of Budget 2024 available at <https://www.gov.ie/en/publication/e20e8-budget-2024-the-use-of-carbon-tax-funds/>.

In the Programme for Government - Our Shared Future, the Government committed to ring-fence all revenues raised from the increase in carbon tax rates for the period out to 2030, estimated to be €9.5 billion, and to allocate these amounts to:

- Ensure that the increases in the carbon tax are progressive by spending €3 billion on targeted social welfare and other initiatives to prevent fuel poverty and ensure a just transition;
- Provide €5 billion to part fund a socially progressive national retrofitting programme;
- Allocate €1.5bn of funding to encourage and incentivise farmers to farm in a greener and more sustainable way.

From Budget 2021 to date, all additional funding estimated to have been raised from the increases in the carbon tax has been allocated in full to Departments in line with these commitments on an annual basis. The Department of Public Expenditure NDP Delivery and Reform does not conduct an assessment of the biodiversity impact of expenditure on these allocations, or on others funded from Exchequer resources. It remains the responsibility of Departments in receipt of allocations to ensure all spending is in line with requirements for the use of public funds, including requirements for environmental impact assessment. Details on the expected biodiversity impact of programmes allocated funding from the additional carbon tax revenues would have to come from the Department responsible for the use of that funding. Perhaps of most relevance to biodiversity impact is the carbon tax funding provided to the Department of Agriculture, Food and the Marine to part-fund the Agri-Climate Rural Environment Scheme (ACRES) and to continue prior commitments on green agriculture pilot projects. ACRES is intended to support farmers as they undertake a range of actions which will result in improved outcomes on biodiversity, climate, air and water quality.

Yours sincerely,



David Moloney
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01/11/23

Re: The Environmental Pillars views in relation to the mandates of Semi-State bodies around their biodiversity practices, and how these align with the recommendations made by the Citizen's Assembly on Biodiversity Loss

Dear members of the Joint Committee on Environment and Climate Action,

We are writing to you to express our views in relation to the mandates of semi-state bodies around their biodiversity practices, and how these align with the recommendations made by the Citizen's Assembly on Biodiversity Loss.

Back in February 2023, the Environmental Pillar, Stop Climate Chaos and the Sustainable Water Network (SWAN) wrote to relevant government Ministers to say that we are strongly of the view that public land must be utilised in the public interest and that all public bodies must be mandated to lead in Ireland's response to biodiversity loss and climate breakdown. The Irish people should have a greater say in how that is achieved. At the time, there was public outrage in response to the agreement between Coillte and Gresham House PLC. The admission by Minister McConalogue that the deal was "*not the government's preferred option*¹," starkly highlighted the lack of accountability and government oversight that has persisted in the operation of public bodies such as Coillte and Bord Na Móna. Coillte's agreement with Gresham House and the persistent greenwashing of outdated and unsustainable land use practices by both bodies^{2 3} signal an unacceptable lack of leadership by the State in response to Ireland's declared climate and biodiversity emergency⁴.

¹ The Journal (2023) Coillte forestry deal 'not government's preferred option', admits agriculture minister <https://www.thejournal.ie/coillte-deal-mcconalogue-5979424-Jan2023/>

² Opinion: Is greenwashing our greatest threat to nature? <https://greennews.ie/greenwashing-the-greatest-threat-to-nature/>

³ Environmental Pillar (2022) Coillte's Strategic Vision For Its Future Forest Estate

<https://environmentalpillar.ie/2023/02/14/environmental-pillar-2022-coilltes-strategic-vision-for-its-future-forest-estate/>

⁴ RTE (2019) Ireland becomes second country to declare climate emergency <https://www.rte.ie/news/environment/2019/0509/1048525-climate-emergency/>

We remain strongly of the view that the legal mandates of Coillte and Bord Na Mona's must be reviewed and brought in line with societal expectations and the stark realities of the States declared biodiversity and climate emergency⁵. The review should be informed by the various relevant recommendations from the Citizens Assembly on Biodiversity Loss, as well as the commitments outlined in the EU Biodiversity Strategy for 2030 and Ireland's Climate Action Plan. Such a review is already long overdue considering that the Programme for Government (PFG)⁶ has already committed to review the remits of both bodies. To meaningfully deliver on the PFG commitments, the narrow economic mandates conferred on Coillte, Bord na Móna by outdated legislation must be amended. This is a rational first step to reform the narrow economic focus that has directed the management and governance of these public lands.

Coillte

The principal objectives of Coillte are outlined in section 12 of the Forestry Act 1998, namely to carry on the business of forestry and related activities on a commercial basis and in accordance with efficient silvicultural practices.

Coillte is the largest landowner in the Irish State, managing a landholding of 440,000 ha or 7% of Ireland's land area. Of this land, approximately 364,000 ha (84%) is forested⁷ representing the vast majority of the 49.1% of Irish forestry in public ownership⁸. Ireland's unnatural and industrial model of forestry is arguably the least sustainable in Europe. For example, within the EU Ireland has the highest share of forest area dominated by introduced tree species and the highest level of plantation forestry. This is in stark contrast to Europe as a whole where 87% of forest area is semi-natural⁹. The sector remains dominated by low diversity plantations which are clear-cut. This is also the case on Coillte land where conifer species cover the majority of the forested area of 320,000 ha or 73% of the total estate. The principal conifer species of the estate are the non-native Sitka spruce (covering 240,000 ha or 55%), followed by Lodgepole pine, Japanese larch, Norway spruce and Douglas fir.

Commercial forestry is a leading threat and pressure on protected habitats and species in Ireland¹⁰. Forestry is reported as having negative effects on a wide range of species, including fish, molluscs, terrestrial mammals and vascular plants because of the wide sphere of influence of some activities for example through water quality impacts. The habitats which have been most negatively impacted by forestry are peatlands, wetlands and grasslands¹¹. Forestry is a leading pressure on water quality in Ireland and is a significant pressure on our last pristine High-Status water bodies¹². Commercial forestry has a disproportionate impact on Ireland's environment relative to its land cover mainly due to its intensive nature and its distribution within sensitive wetlands, uplands and catchment headwaters.

⁵ Ireland becomes second country to declare climate emergency <https://www.rte.ie/news/environment/2019/0509/1048525-climate-emergency/>

⁶ Programme for Government: Our Shared Future <https://assets.gov.ie/130911/fe93e24e-dfe0-40ff-9934-def2b44b7b52.pdf>

⁷ Coillte (2022) Strategic Vision for Our Future Forest Estate <https://www.coillte.ie/wp-content/uploads/2022/07/Coillte-Future-Forest-Estate-Strategic-Vision-Consultation-Booklet.pdf>

⁸ DAFM (2023) Forest Statistics Ireland 2023 <https://www.gov.ie/pdf/?file=https://assets.gov.ie/267876/499d9f21-751b-4d53-89d6-ed8e8e9efb97.pdf#page=null>

⁹ Forest Europe (2020): State of Europe's Forests 2020. <https://foresteurope.org/state-of-europes-forests/>

¹⁰ NPWS (2019). The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report.

¹¹ *ibid*

¹² Water of Life (2023) Framework of Measures and Best Practice Guidelines for the Protection and Restoration of High Status River Waterbodies Annex 2: Forestry https://www.watersoflife.ie/app/uploads/2023/08/Measures_Forestry.pdf

Forestry covers 450,940 ha of peatlands in Ireland¹³ with 60% of the forestry on peat being State owned¹⁴, with Coillte being responsible for 232,500 ha of forestry on peatlands making them the largest owner of peatland habitat in Ireland¹⁵. The EPA calculate that forestry on organic soils may emit from 0.59 t C/ha/yr to 1.7 t C/ha/yr^{16 17} which implies national emissions in the region of 0.2 Mt CO₂ / yr to 0.8 Mt CO₂ / yr. The legacy issues associated with the afforestation of peatlands have been largely ignored by policy makers in Ireland albeit the scale of the adverse impacts on climate are now reflected in Ireland's Climate Action Plan 2023¹⁸, while the Climate Change Advisory Council have called for the rewetting and rehabilitation of afforested peatlands and review and revision of the primary legislation regarding afforestation and the management of existing afforested peatlands¹⁹.

As a public authority and leader in Irish forestry, Coillte has the ability and the responsibility to lead the Irish forestry sector towards a more sustainable model of forestry and land use. Coillte owns a significant area of approx. 96,000 ha of Special Protection Areas (SPA) and Special Areas of Conservation (SAC), Natural Heritage Areas (NHA) and proposed Natural Heritage Areas (pNHA). According to Coillte's own assessment, their landholdings support a number of Rare, Threatened or Endangered, which is equivalent to the IUCN conservation status of "*critically endangered, endangered or vulnerable*"²⁰. Coillte's land holdings also encompass many vulnerable nationally important high-status water bodies. Coillte have significant expertise when it comes to nature restoration having been involved in a range of completed and ongoing habitat restoration projects²¹.

Given the amount of internationally and nationally important areas for biodiversity within Coillte landholding and the importance of peatlands, wetlands and forests in Ireland's efforts to tackle climate change, Coillte clearly must play a leading role in the national response to the biodiversity loss and climate breakdown.

Bord Na Móna

Bord Na Móna was founded under the Turf Development Acts 1946 and its legal remit was established under the act and other subsequent acts between 1946 and 1998. In essence Bord Na Móna's remit has been to acquire peatlands with the objective to exploit them commercially for turf and turf products.

Bord na Móna owns a landholding of approximately 80,000 ha²², or approximately 1% of Ireland's land area. This is constituted of a network of 130 bogs²³. Coincidentally there are estimated to be

¹³ Duffy, P., Black, K., Fahey, D., Hyde, B., Kehoe, J., Murphy, B., Quirke, B., Ryan, A.M. and Ponzi, J., 2020. Ireland's National Inventory Report 2020. Greenhouse Gas Emissions 1990-2018 Reported to the United Nations Framework Convention on Climate Change. Environmental Protection Agency, Johnstown Castle, Ireland.

¹⁴ NPWS (2015) National Peatlands Strategy

<https://www.npws.ie/sites/default/files/publications/pdf/NationalPeatlandsStrategy2015EnglishVers.pdf>

¹⁵ NPWS (2015) A National Peatlands Strategy 2015. Dublin: National Parks & Wildlife Services. Department of Arts, Heritage and the Gaeltacht.

¹⁶ EPA (2022) Ireland's National Inventory Submissions 2022 <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/irelands-national-inventory-submissions-2022.php>

¹⁷ Jovani-Sancho, A. J., Cummins, T., & Byrne, K. A. (2021). Soil carbon balance of afforested peatlands in the maritime temperate climatic zone. *Global Change Biology*, 27(15), 3681-3698.

¹⁸ Government of Ireland (2023) Climate Action Plan 2023 <https://www.gov.ie/pdf/?file=https://assets.gov.ie/270956/94a5673c-163c-476a-921f-7399cdf3c8f5.pdf#page=null>

¹⁹ Climate Change Advisory Council (2023) Annual Review 2023

<https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2023-FINAL%20Compressed%20web.pdf>

²⁰ Coillte (2011) Sustainability Report, Coillte Teoranta <http://sustainabilityreport2011.coillte.ie/index.php?id=130>

²¹ <https://www.coillte.ie/our-business/our-projects/nature-conservation/>

²² Bord Na Mona (2016) Bord Na Mona Biodiversity Action Plan 2016 – 2021 <https://www.bordnamona.ie/wp-content/uploads/2021/03/Biodiversity-Action-Plan-2016-2021-1.pdf>

²³ Bord Na Mona (2014) The Strategic Framework for Future Use of Peatlands <https://www.npf.ie/wp-content/uploads/2017/09/0457-Bord-na-Mona.compressed.pdf>

80,000ha of industrial cutover bogs in Ireland²⁴. At the time of the publication of Bord na Móna Strategic Framework for Future Use of Peatlands in 2014, 77% of the land holding was in active industrial peat production purposes; with a high proportion of the remaining landholding constituting post-industrial cut-over bog and a small percentage of semi-intact bogland. In 2016, cutaway bog accounted for 30% of the total Bord na Móna bog area, while areas still in active production which are destined to become cutaway bog account for up to 55% by area²⁵.

Carbon stocks held in natural and managed peatlands in Ireland are estimated at 2216 Mt of carbon, with around 42% in raised bogs, 42% in lowland blanket bogs and 15% in mountain blanket bogs²⁶. Natural and cutover peatlands together contain just under half of the national peatland carbon stock. Degraded peatlands are a significant source of emission nationally estimated at around 860,000 tonnes of carbon per year (or 3.15 Mt CO₂ / yr). Restoration of peatlands and organic soils has the potential to reduce carbon losses in a relatively short time following rewetting²⁷; while rewetting and restoring peatlands can deliver co-benefits such as biodiversity, improved water quality and water regulation²⁸. For this reason, rewetting and rehabilitation targets for industrial peatlands play an important role in Irish climate policy. The Climate Change Advisory Councils (CCAC)¹⁰ have highlighted that the rewetting of drained organic soils and peatland restoration must be a key government priority if Ireland is going to achieve a 51% reduction in net emissions in the LULUCF sector. The EPA, have concluded that only modelled land use scenarios which included restoration of 70,000 ha of exploited peatlands managed to achieve net-zero in the AFOLU sector by 2050²⁸. This is far more ambitious than the existing target in the Climate Action Plan 2023 of rehabilitating 33,000 ha of peatlands over eighty-two Bord na Móna bogs²⁹.

From a biodiversity perspective Bord Na Móna's landholding would formerly have supported an incredible array of wildlife across a mosaic of raised bog, blanket bog, wetlands, grasslands, woodlands and freshwater habitats³⁰. Though much has been lost since Bord Na Móna was established in the 1940s, the potential for rehabilitating both remnant habitats and degraded habitats is frankly incredible. Cutaway bog supports a range of pioneer habitats such as wetlands, species rich grasslands, scrub and emergent bog woodlands; to more complex poor fen and rich fen habitats and established bog woodland. Already these sites support internationally important wintering Whooper Swans and breeding Lapwing and a range of waterfowl³¹.

Bog remnants account for 12% of the bog area and largely comprises areas of degraded raised bog, patches of active raised bog (a priority habitat under the Habitats Directive). These remnants support threatened species such as Curlew and Sphagnum pulchrum, Marsh Fritillary butterfly. Drained raised bogs account for <3% of total bog area which have the potential to be restored and have a high conservation value. Some of these bogs still retained active raised bog habitat and all

²⁴ Duffy, P., Black, K., Fahey, D., Hyde, B., Kehoe, J., Murphy, B., Quirke, B., Ryan, A.M. and Ponzi, J., 2020. Ireland's National Inventory Report 2020. Greenhouse Gas Emissions 1990-2018 Reported to the United Nations Framework Convention on Climate Change. Environmental Protection Agency, Johnstown Castle, Ireland.

²⁵ Bord Na Mona (2016) Bord Na Mona Biodiversity Action Plan 2016 – 2021 <https://www.bordnamona.ie/wp-content/uploads/2021/03/Biodiversity-Action-Plan-2016-2021-1.pdf>

²⁶ Renou-Wilson, F. et al (2022) Peatland Properties Influencing Greenhouse Gas Emissions and Removal <https://www.epa.ie/publications/research/land-use-soils-and-transport/research-401-peatland-properties-influencing-greenhouse-gas-emissions-and-removal.php>

²⁷ Renou-Wilson, F. et al (2022) Peatland Properties Influencing Greenhouse Gas Emissions and Removal <https://www.epa.ie/publications/research/land-use-soils-and-transport/research-401-peatland-properties-influencing-greenhouse-gas-emissions-and-removal.php>

²⁸ EPA (2022) Land Use Review: Fluxes, Scenarios and Capacity Synthesis Report

²⁹ Government of Ireland (2023) Climate Action Plan 2023 <https://www.gov.ie/pdf/?file=https://assets.gov.ie/270956/94a5673c-163c-476a-921f-7399cdf3c8f5.pdf#page=null>

³⁰ Bord Na Mona (2016) Bord Na Mona Biodiversity Action Plan 2016 – 2021 <https://www.bordnamona.ie/wp-content/uploads/2021/03/Biodiversity-Action-Plan-2016-2021-1.pdf>

³¹ *ibid*

showed good potential for restoration of active and degraded raised bog habitat³². Such is the conservation value of these sites that they have already or may be afforded national or EU protection³³. A perfect illustration of the potential of Bord Na Móna's landholding for nature restoration is the successful fledging of chicks by a pair of Common Crane's in 2022 and 2023 on a Bord na Mona rewetted peatland in Co. Offaly. The species hasn't bred in Ireland for over 300 years^{34 35}.

The opportunity and the necessity to rehabilitate and restore nature and carbon stocks across Bord Na Móna's landholding is not currently matched by existing policy targets. While the value of these public lands for nature is well recognised the reality on the ground is that industrial uses for bogs post production continue to be prioritised while there is no clear framework or targets in place to assess whether sites should be prioritised for nature restoration and eco-tourism. Rebranding and public communications exercises aside, the use of this public land continues to be driven by commercial interests while surrounding communities remain peripheral figures in the opaque decision-making process.

Mandate for reform

There is a strong mandate from the public to reform Coillte and Bord Na Móna as reflected in the recommendations from the Citizens Assembly on Biodiversity Loss calling for the reform of both semi-state bodies.

- Recommendation 120 highlights *“there is a conflict of interest between business aims and corporate responsibility, particularly for State agencies. The State must fundamentally reassess the constitution, goals and operations of Coillte and the 1988 Forestry Act (as amended).”*
- Recommendation 116 specifically calls for the remits of Bord Na Móna & Coillte to be reviewed with a focus on Peatland restoration and rehabilitation projects, with targeted outcomes on biodiversity conservation.
- Recommendation 121 states that *“State-owned woodlands should be recognised and managed as a strategic, long-term national asset for the benefit of the common good.”*

At a political level this mandate is already manifest in the Programme for Government (PFG)³⁶, which commits to *“Ensure that Coillte's remit supports the delivery of climate change commitments and the protection of biodiversity”* and *“the retention of the commercial forests of Coillte in public ownership”* and also to *“ensure that Bord na Móna is required to take into account climate, biodiversity, and water objectives, as they deliver on their commercial mandate, through an amendment to the Turf Development Acts 1998 (emphasis added)”*. We have seen no evidence of progress to deliver on these PFG commitments. However, the debate around the European Commission's proposal for an EU Nature Restoration Law showed that there is a willingness within the government to prioritise Coillte and Bord Na Móna lands for ambitious rewetting and nature restoration³⁷.

³² Bord Na Mona (2016) Bord Na Mona Biodiversity Action Plan 2016 – 2021 <https://www.bordnamona.ie/wp-content/uploads/2021/03/Biodiversity-Action-Plan-2016-2021-1.pdf>

³³ *ibid*

³⁴ <https://www.bordnamona.ie/gone-for-300-years-common-crane-comes-home-to-rewetted-irish-peatlands/>

³⁵ <https://www.bordnamona.ie/common-crane-chick-fledges-on-bord-na-monas-rewetted-peatlands-2nd-year-after-300-year-hiatus/>

³⁶ Programme for Government: Our Shared Future <https://assets.gov.ie/130911/fe93e24e-dfe0-40ff-9934-def2b44b7b52.pdf>

³⁷ Irish Farmers Journal (2023) Rewetting targets can be met from State-owned lands - McConalogue <https://www.farmersjournal.ie/news/news/rewetting-targets-can-be-met-from-state-owned-lands-mcconalogue-765598>

To meaningfully deliver on the PFG commitments, the narrow economic mandates conferred on Coillte and Bord na Móna by outdated legislation must be amended and brought in line with environmental and climate obligations at national and EU level.

Conclusion

The untapped potential of Coillte and Bord Na Móna's land holdings presents an unprecedented opportunity to restore nature at a scale, delivering essential ecosystem services to society such as biodiversity restoration, climate change adaptation and mitigation, as well as employment and public amenity. The overall benefit/cost ratio of effective environmental protection and nature restoration are overwhelmingly positive^{38 39}. At a time when we are asking more and more of private landowners it is critically important that the State is seen to lead from the front. Public land must be utilised in the public interest and the Irish people should have a greater say in how that is achieved. Reforming land use in Coillte and Bord Na Móna is not only desirable but necessary to address our national efforts to reduce green-house gas emission in the land use sector and to achieve the pledges we have made to restore nature under the EU Biodiversity Strategy 2030⁴⁰ and the United Nations COP 15 Biodiversity conference⁴¹.

Existing strategies such as Coillte's strategic vision for its future forest estate⁴², and Bord na Móna's Enhanced Peatland Rehabilitation Scheme⁴³ while a step in the right direction cannot deliver transformational change if the direction emanating from their boards continues to be based on limited commercial mandates. Any review should be informed by input from the public.

We the call on the State without delay to:

- **Amend the legal mandates conferred on Coillte by the Forestry Act 1988, Bord na Móna by the Turf Development Acts 1946-1998 and the OPW under the Arterial Drainage Acts 1945-1995, ensuring that the protection and restoration of the environment and climate action are core obligations; and place the government's commitment to retain public land in public ownership on a legal footing.**
- **Issue new letters of expectation from government to the boards of Coillte and Bord Na Móna signalling the imminent reform of their legal mandates and directing them to not enter into any legal agreements which would undermine public ownership or public access to their landholdings.**

³⁸ Balmford, A., Bruner, A., Cooper, P., Costanza, R., Farber, S., Green, R. E., ... & Turner, R. K. (2002). Economic reasons for conserving wild nature. *science*, 297(5583), 950-953.

³⁹ Commission Staff Working Document Impact Assessment - Accompanying the proposal for a Regulation of the European Parliament and of the Council on nature restoration (Part 1/12) https://environment.ec.europa.eu/publications/nature-restoration-law_en

⁴⁰ https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en#:~:text=The%202030%20EU%20Biodiversity%20Strategy&text=The%20EU's%20biodiversity%20strategy%20for,contains%20specific%20actions%20and%20commitments.

⁴¹ <https://www.cbd.int/article/cop15-cbd-press-release-final-19dec2022>

⁴² Coillte (2022) Strategic Vision for Our Future Forest Estate <https://www.coillte.ie/wp-content/uploads/2022/07/Coillte-Future-Forest-Estate-Strategic-Vision-Consultation-Booklet.pdf>

⁴³ Bord na Móna to commence Enhanced Peatland Rehabilitation Scheme <https://www.bordnamona.ie/bord-na-mona-to-commence-enhanced-peatland-rehabilitation-scheme/>

We would like to dedicate this submission in loving memory to our friend and colleague Andrew St Ledger who recently passed away. A committed environmental advocate, he dedicated much of his professional life to the protection and restoration of Ireland's native woodlands and to the advancement of sustainable forest management. Andrew worked tirelessly to reform Coillte up until his death. A mighty oak has fallen in the woods but his legacy lives on.

**RE: ESB's biodiversity practices, and how these align with the recommendations made by the Citizen's Assembly on Biodiversity Loss**

ESB welcomes the opportunity to provide the Joint Oireachtas Committee on Environment and Climate Action with a submission regarding its mandate around the biodiversity practices in our organisation, and how these align with the recommendations made by the Citizen's Assembly on Biodiversity Loss. We welcome the work and the conclusions of the final report. In this context we have outlined below how ESB's corporate strategy and purpose aligns with the call for leadership and action in relation to biodiversity.

This response is structured as follows:

- Executive Summary
- An overview of ESB Group Strategy and sustainability commitments and goals
- A review of ESB Group operations and how these complement various recommendations of the Citizen's Assembly on Biodiversity Loss

Executive Summary

While decarbonisation of the electricity system forms the overarching ambition of ESB Group and ESB Networks' respective strategies, in all parts of its business, ESB has made significant strides towards ensuring that biodiversity is considered in its strategies and operations. ESB Group has developed a Biodiversity Policy which underpins the ESB Group Policy Statement on Environmental Management and Sustainability. The stated aim of the policy is to set out the context in which ESB endeavours to manage its activities to avoid significant impact on habitats, species or other aspects of national heritage and where feasible, to enhance biodiversity. In addition, a Group Standard relating to Biodiversity is in place, comprising 24 discrete measures to ensure that ESB's activities are managed in a sustainable manner in relation to biodiversity.

Work is currently underway regarding the preparation of ESB Corporate and Business Unit-specific strategies with regard to biodiversity. Strategies and associated project design will be informed by best practice and utilising expertise of acknowledged subject matter experts. Biodiversity impacts are already considered in all areas comprising existing assets or where new asset investments are proposed within close proximity to designated sites (as set out by national, regional or EU legislation), as well as other non-designated features of ecological interest. ESB Group employs specialist environmental staff who are involved throughout all stages of projects ensuring implementation and enforcement of biodiversity related legislation, directives and policies during all project feasibility/due diligence/site selection stages, through design stage, construction and operation of a development. Please find ESB's initiatives related to biodiversity outlined in greater detail below.

ESB Group Strategy and sustainability commitments and goals

As a strong, diversified utility, ESB operates across the electricity market, from generation (ESB Generation & Trading) through transmission and distribution (ESB Networks, NIE Networks), to supply of customers (Electric Ireland) in addition to using our networks to carry fibre for telecommunications (SIRO).

At year-end 2022, ESB has a regulated asset base of approximately €12.0 billion (comprising ESB Networks €9.7 billion and NIE Networks €2.3 billion), a 30% share of generation in the all-island market, and supply businesses



supplying electricity and gas to over two million customer accounts throughout the island of Ireland and Great Britain. In June 2023, ESB Group employed almost 9,000 people.

As a business, ESB is acutely aware of the main drivers of biodiversity loss on a national and global level and is particularly cognisant of the interdependencies between biodiversity and climate change. Our recent publications on this thematic area reflect ESB's commitment to environmental protection. ESB's ***Driven to Make a Difference: Net Zero by 2040*** corporate strategy sets out a clear roadmap for ESB to achieve net zero emissions by 2040. In addition, ESB Networks' ***Networks for Net Zero*** strategy to 2030 is framed by the Government's Climate Action Plan. It is driven by ESB Networks' central role in leading the transition to a secure and affordable low-carbon future, using clean electricity. The ESB Networks strategy commits to a net biodiversity gain from our operations.

While net zero by 2040 forms the overarching ambition of our respective strategies, we are also conscious of the impact of our operations on people and planet. We are challenging ourselves to ensure that our activities make positive social and environmental impacts. ESB specifically recognises the importance of biodiversity in the landscape and is working to ensure that its activities are managed sustainably to preserve and, if possible, strengthen, ecosystems through sustainable regenerative practices.

How ESB Group's Strategies complement recommendations of the Citizen's Assembly on Biodiversity

ESB has reviewed the recommendations of the Citizen's Assembly and submits the following comments.

Regarding the Overarching Recommendations of the Assembly (1.1) and those relating to a Strategic Approach to Biodiversity Loss (1.2), ESB is committed to effective leadership, clear vision and an enabling environment for action as well as to coordinated action and an over-arching strategic approach at a national level. Furthermore, ESB is aligned with the Assembly's assertion that in terms of its energy production, Ireland has the potential to tackle the climate issues, while also addressing the biodiversity challenges (1.10). ESB's commitments in this regard are exemplified by the following:

1. At the end of 2022, ESB published the ESB Sustainability Leadership Statement, wherein the company commits to stepping forward on sustainability issues. The statement highlights that ESB is driven to make a difference through electricity as an enabler for regeneration, and commits to:
 - a. Playing a full role in building a resilient electricity system of the future, where carbon-free energy will displace carbon emissions in how we power our buildings and transport.
 - b. Enhancing nature where we operate and supporting our host communities to develop and grow stronger.
 - c. Empowering our people in a healthy workplace to act sustainably, supporting our customers to reach net zero and working to protect the rights of all people in our value chain.
2. ESB has made a detailed submission to the Department of Housing, Local Government and Heritage with regard to the Draft 4th National Biodiversity Action Plan public consultation. ESB has also enhanced biodiversity-specific engagement with key parties in other utilities and the broader environmental sector such as the Business for Biodiversity platform (outlined further below).
3. Work is currently underway regarding the preparation of ESB group and Business Unit-specific strategies with regard to biodiversity. Of ESB's business units, ESB Networks and ESB Generation and Trading are the areas with the largest physical footprint. Strategies and associated project design will



be informed by best practice elsewhere and utilising expertise of field-leading specialists. Strategic development includes the following:

- a) ESB's Group Policy Statement on Environmental Management and Sustainability specifically references the importance of biodiversity as part of its commitment to leadership in the transition to a low carbon energy system. This policy commits ESB to operate its businesses responsibly, respectful of biodiversity and without harming eco-systems.
- b) In addition, a Group Standard relating to Biodiversity is in place, comprising 24 discrete measures to ensure that ESB's activities are managed in a sustainable manner in relation to biodiversity. This environmental standard sets out the requirements to identify potential impacts on biodiversity with the aim of avoiding or mitigating these impacts, and where feasible, work to enhance biodiversity.
- c) ESB has been selected as a lead participant in the Business for Biodiversity Platform pilot and has been a key participant in the development of its Community of Practice through 2023. This multi-stakeholder platform is due to be officially launched for business membership imminently. The initiative is a key objective delivery vector in the Draft 4th National Biodiversity Action Plan (NBAP), with an aim to scale up to 900 businesses over the duration of the plan.
- d) ESB is a contributor to the Nature+Energy research project, funded by MaREI, the Science Foundation Ireland funded research centre, a consortium of Irish renewable energy companies and Wind Energy Ireland. This project aims to develop new ways of accounting for the value of nature on wind farms, utilising novel environmental monitoring systems that will revolutionise how we measure and monitor biodiversity on and around wind farms. The project aims to deliver sector-specific Natural Capital Accounting, Land-Management Decision Support Tools and Biodiversity Action Plans to facilitate the enhancement of biodiversity and help to mitigate the effects of wind farms on key species.
- e) With regard to offshore renewables development, ESB employs multi-annual Digital Aerial Surveys across all our projects to ensure we capture the highest quality baseline data for birds and marine mammals to inform our impact assessments and monitoring. We are currently working on a number of Nature Inclusive Design Initiatives (NID) such as considering biodiversity enhancing materials for construction of our offshore wind projects. ESB has continued to invest in innovative ecology research, and we work with nature conservation organisations to help support biodiversity and conservation.
- f) In early October 2023, ESB has announced plans to fund a Marine Mammal Observer training programme. This will be open to graduates, final-year undergraduates and postgraduate students who are studying or working in the area of marine science or related disciplines. The aim of the programme is to assist in developing marine ecology education and skills to support successful applicants at the early stages of their careers in the marine environmental profession. This is critical leadership to ensure future capacity in this important ecological specialism considered central to facilitating successful rollout of the Irish offshore renewable sector whilst avoiding impacts to marine biodiversity.
- g) As a key partner of the All-Ireland Pollinator Plan (AIPP), ESB has committed to take up opportunities for more pollinator-friendly management of landscapes within its property portfolio, where this fits with the needs of safety, business operations and property management. ESB is continuing to collate asset site information with the objective of



identifying parts of sites suitable for supporting pollinators, through various actions such as minor changes in mowing regimes or new habitat creation. The feasibility of the reduction in the volume of herbicides, frequency of use and spatial application, as well as options for alternative treatment regimes is currently being considered across the ESB business units. ESB Networks has progressed a number of biodiversity enhancement pilots at facilities around the country.

- h) ESB ensures that all proposed operational and maintenance activities are screened at an early stage to determine whether Environmental Impact Assessment (EIA), Appropriate Assessment (AA), Ecological Impact Assessment (EclA) or Planning Permission are required. Biodiversity impacts are considered in all areas comprising existing assets or where new assets are proposed within close proximity to designated sites (as set out by national, regional or EU legislation), as well as other non-designated features of ecological interest.
- i) ESB Group employs a number of specialist environmental staff including professional ecologists, as well as operating a consultant framework relating to terrestrial, freshwater and marine ecology. ESB's ecology staff are involved throughout all stages of projects ensuring implementation and enforcement of biodiversity related legislation, directives and policies during all project feasibility/due diligence/site selection stages, through design stage, construction and operation of a development.

ESB agrees with the Assembly's assertion that local communities are key to protecting Ireland's environment, heritage and culture, and are therefore critical to conserving and restoring biodiversity (1.6). Furthermore, ESB concurs with the Assembly's belief that that education and public engagement are key to empowering people to curb biodiversity loss across the country. With strengthened awareness, individuals, groups and communities across the country, in all environments from rural to urban, can be encouraged to engage in the conservation and restoration of biodiversity for one another and for the generations coming after us (1.8).

- j) ESB has a long tradition of supporting communities and programmes that enhance Ireland's economic and social fabric, helping to bring light and energy to the people we serve, allowing individuals and communities to fulfil their potential in every walk of life. Over the past decade, in addition to dividend paid to the Exchequer of EUR1.5bn ESB has also invested more than €10 million in worthy causes through its corporate giving programmes.
- k) In the context of the need to for the engagement of Ireland's young people, ESB sponsors 'Science Blast', the non-competitive educational programme for primary schools and provides a panel of volunteer judges from its staff to annual events around the country. ESB proactively uses this opportunity to encourage students to take an interest in environmental issues, advance critical thinking and drive engagement with STEM subjects including ecology and biodiversity.

Furthermore, ESB agrees with the Assembly's assertion that in order to monitor biodiversity and the impacts on biodiversity of various activities and policies, it is essential that biodiversity and related resources are regularly measured against high-quality baseline data (1.9).



- l) ESB will progress desktop research and field studies over the coming years to consolidate an updated baseline dataset for habitats and species occurring within its landholdings.
- m) ESB Networks have recently committed funding to the Eurelectric PowerPlant project, a key deliverable of which is a technical guidebook for electricity utilities across Europe, covering early spatial planning, the mitigation hierarchy, metrics to measure losses and gains, additionality, transparency in reporting and monitoring, stakeholder consultation and landscape scale integration.
- n) In the context of the EU's Corporate Sustainability Reporting Directive, ESB is undertaking significant amounts of work in preparation for the Directive's Social and Environment reporting requirements for companies of our size and scale.

The aforementioned strategic planning and targeted actions will assist in the delivery of several of the Assembly's other recommendations under Freshwater (1.12), Marine and Coastal Environments (1.13), Peatlands (1.14), Forestry, Woodlands and Hedgerows (1.15), 1.16 Protected Sites and Species (1.16), Invasive Species (1.17), Urban and Built Environment (1.18) and Industry, Business and Tourism (1.19).

ESB Networks

ESB Networks is currently drafting a Biodiversity Action Plan, comprising both strategic and practical actions which are readily implementable and scalable. Measures will relate to both operational infrastructure and future projects and will include consideration of tools and metrics by which net gain can be monitored.

ESB Generation & Trading (GT) Fisheries

ESB Generation & Trading has recently updated its' conservation strategy. The revised strategy is now significantly broader in its scope than the previous iteration which mainly had a focus on operational matters relating to the three salmon hatcheries, the Eel Trap & Transport initiatives, river enhancement projects and the management of ESB fisheries. The updated strategy now titled '**ESB Sustainable River Strategy**' is based around the following three strategic goals:

1. Shift the balance between **fisheries conservation** and renewable generation based on scientific evidence
2. Implement a **Nature Positive Approach** along 30% of ESB owned river channel or lakeside habitat by 2030.
3. Commit to a measurable net gain of ESB's contribution to our **Communities** through sustainability initiatives

Furthermore, site-specific Management Plans are being developed for GT landholdings with ecological designations.



Conclusion

As noted above, ESB is committed to keeping environmental protection at the centre of its business operations. ESB's ***Driven to Make a Difference: Net Zero by 2040*** corporate strategy sets out a clear roadmap for ESB to achieve net zero emissions by 2040.

ESB Group's strategy is complemented by ESB Networks' ***Networks for Net Zero*** strategy to 2030 which has been developed in the context of the Government's Climate Action Plan. Networks for Net Zero is driven by ESB Networks' central role in leading the transition to a secure and affordable low-carbon future, using clean electricity. The strategy also commits to a net biodiversity gain from our operations.

We trust that the actions and steps outlined above illustrate the seriousness with which we are approaching this major and significant challenge.

Yours sincerely,

A handwritten signature in black ink that reads 'Niall Hogan'.

Niall Hogan

Senior Manager, Environment & Sustainability

People & Sustainability Directorate



Ms Gina Long, Clerk
Joint Oireachtas Committee on Environment and Climate Action
Leinster House
Dublin 2

15 November 2023

Dear Ms. Long,

As was requested at the meeting of the Joint Committee on Environment and Climate Action on 24th October last, please see below an overview of the Department of Finance's engagement with Multilateral Development Banks in the area of Biodiversity.

Ireland is a member of a number of multilateral development banks (MDBs) including the World Bank, African Development Bank, Asian Development Bank and Asian Infrastructure Investment Bank. Annually, Ireland contributes between €60 - €70 million to these institutions annually, of which approximately 30% is attributed as climate finance.

All of these multilateral institutions have policy programmes encompassing biodiversity within their work tackling the climate crisis, and as outlined at the Committee, through Ireland's membership and engagement with Multilateral Development Banks, the Department of Finance will continue to advocate the inclusion of biodiversity as a priority within their respective policy programmes.

Significantly, the recent International Monetary Fund/World Bank Annual Meeting in Marrakech endorsed proposals to broaden the World Bank's mission to end extreme poverty and boost shared prosperity on a liveable planet prioritising eight global challenges including biodiversity and nature. It is expected that this refined mandate will enhance the World Bank's work on biodiversity in terms of its operations, funding and client engagement. Similarly, within the regional multilateral development banks, Ireland and like-minded shareholders have successfully championed the integration of biodiversity within their mandates. This has increased these institutions biodiversity awareness, and commitment to activity.

I will also highlight that, at an EU level, the European Investment Bank (EIB) as the climate bank of the EU is seeking to increase its activities and investments in climate action and environmental sustainability over the next number of years.



Under its Climate Strategy Roadmap (2021-2025), the Bank is aiming to support €1 trillion of relevant investments by 2030. The EIB provides approximately €1 billion of funding per annum to Ireland, with an increasing focus on climate action and environmental sustainability.

The Department of Finance facilitates extensive engagement, through the EIB-Ireland Financing Group, between relevant Government Ministers and Departments and the EIB on climate and biodiversity related financing opportunities that may exist in Ireland.¹ The Department is supportive of these engagements, as the EIB can provide expert technical advice and guidance for climate related initiatives in Ireland.

Please see the attached Annex which sets out further information on the activities of the respective MDBs. However, if any additional information/assistance is required, please do not hesitate to contact me.

Yours sincerely,

David Owens

Principal Officer, Climate and Sustainable Finance Unit, Department of Finance

¹ <https://www.eib.org/en/press/all/2022-305-national-parks-and-wildlife-service-and-eib-strengthen-support-to-rehabilitate-irish-peatlands>



Annex A: Additional Information

World Bank Group (WBG)

The WBG has increased its focus on biodiversity loss as a critical development issue. Its Climate Change Action Plan highlights the importance of integrating solutions that address climate change and nature together. The WBG is a key financier of biodiversity in developing countries and is developing a methodology to track nature-positive investments. It was a co-signatory of the Joint Statement on Nature, People and Planet at COP26 – alongside other MDBs – to mainstream nature into policies, analysis, investments, advice and operations. The Bank is also working with the World Resources Institute to further the implementation of the Joint Statement.

A new mission for the World Bank has been developed, placing emphasis on poverty, prosperity, and liveable planet. This mission will guide the Bank to support resilient and sustainable development. The support will focus on country-level, regional, and global challenges, including eight identified as priorities (and which shall be supported by Global Priority Programs) – one of these is Biodiversity and Nature, of which Ireland has been supportive.

African Development Bank (AfDB)

The AfDB is currently updating its Ten Year Strategy, in which Ireland has supported the inclusion of a commitment on Biodiversity. The AfDB has also partnered with the United Nations Environment Programme to advance the implementation of the Kunming-Montreal Global Biodiversity Framework in Africa.

Asian Development Bank (ADB)

ADB has a long-standing commitment to mainstreaming nature into its policies, analysis, assessments, advice, investments and operations. The Bank seeks to promote nature positive investments including the conservation and restoration of living natural resources, biodiversity and ecosystems.

ADB has long been committed to protecting natural capital and biodiversity to support economic growth and improve people's lives throughout the region. This includes management of protected areas, safeguarding watersheds, restoring habitats, and conserving biodiversity. ADB also provides knowledge and



technical support for the inclusion of environmental issues into infrastructure projects, such as roads and bridges. This approach is designed to maximize the economic and social impact of the projects while minimizing the environmental cost. Ireland is supportive of this work.

Asian Infrastructure Investment Bank (AIIB)

The AIIB has recently released its inaugural Climate Action Plan. As part of this, the Bank has committed to taking a holistic approach, which will focus on project solutions that simultaneously mitigate climate changes, build resilience, enhance adaptation and offer co-benefits for biodiversity and nature conservation. Ireland, along with its Euro Area Constituency, has been encouraging the Bank to live up to its ambitions as a Green Bank and to explore synergies and co-benefits to address Biodiversity loss

European Investment Bank (EIB)

The EIB is the lending arm of the EU known recently as the 'Climate Bank of the EU' due to their focus on climate projects and policies. It is the biggest multilateral financial institution in the world and one of the largest providers of climate finance. Its lending is aligned with the Paris Agreement and promotes adaptation, mitigation and environmental sustainability. It was the first institution to issue a green bond and is still the largest supranational green bond issuer.

Building on European Union regulations, its climate alignment requires large companies to disclose their climate consideration, including a mid-term carbon target. Such plans would also address building resilience to future climate change. In general, the EIB will not support projects, including low-carbon ones, with companies that invest in activities such as the building of new coal-fired power plants or coal mines.

The EIB supports the objectives of the European Union Adaptation Strategy inside and outside the EU. The EIB has pledged to increase the share of adaptation support to 15% of the Bank's overall finance for climate action by 2025. This includes biodiversity preservation.



**Teagasc Submission to the
Joint Committee on Environment and Climate Action
in response to recommendations from the
Citizens' Assembly on Biodiversity Loss**

Prepared by:

The Teagasc Biodiversity Working Group:

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November 2023

Teagasc
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Introduction

Teagasc welcomes the *Report of the Citizens' Assembly on Biodiversity Loss* (March, 2023) and the recommendations therein. Teagasc acknowledges the significant efforts undertaken by the Citizens' Assembly on Biodiversity Loss, under the guidance of the chairperson, Dr Aoibhinn Ní Shuilleabháin.

This submission responds to the request for submissions by the Joint Committee on Environment and Climate Action in relation to the recommendations derived from the Citizens' Assembly on Biodiversity Loss report.

This submission is submitted on behalf of Teagasc (the Agriculture and Food Development Authority). Teagasc, established under the Agriculture (Research, Training and Advice) Act 1988, is the national public body providing integrated research, advisory, education and training services to the Irish agri-food sector. Teagasc has and continues to pursue comprehensive research, education and knowledge transfer programmes to address knowledge gaps on the interaction between agriculture and the environment (including biodiversity). One of the Strategic Goals of Teagasc is “to provide science-based evidence and technologies to enable Ireland meet commitments in regard to gaseous emissions, water quality and biodiversity” (Teagasc, 2021). Teagasc programmes (see appendices for details) are fully aligned with and supportive of relevant government and EU policies, in particular the following: *Programme for Government-Our Shared Future* (PFG), *Food Vision 2030*, *The European Green Deal*, *EU Farm to Fork Strategy for a Fair, Healthy and Environmentally-friendly Food System*, and the *EU Biodiversity Strategy for 2030*.

This submission was prepared by the Teagasc Biodiversity Working Group. The Teagasc Biodiversity Working Group is a cross-programme, inter-disciplinary group of Teagasc research and knowledge transfer staff. The submission was prepared following consultation with colleagues across Teagasc using their collective knowledge and expertise in biodiversity. The *Report of the Citizens' Assembly on Biodiversity Loss* has included 159 recommendations, this submission however focuses on those most relevant to Teagasc stakeholders and the wider agri-food sector in particular.

The submission focuses in particular on:

A. Thematic recommendations

- a. Targets, incentives and monitoring.
- b. Locally-led, multi-actor, results-based approaches.
- c. Management of freshwater ecosystems
- d. Farmer training and peer-to-peer learning.

B. Specific recommendations

C. Further comment

Thematic recommendations

Targets, incentives and monitoring.

- R77:** *Biodiversity targets in national schemes (i.e. Common Agriculture Programme (CAP)/ Agri-Climate Rural Environment Scheme (ACRES) must be made significantly more ambitious, detailed and focused on the medium to long-term. Funding must be increased to support this ambition.*
- R15:** *People in primary production industries should implement practices that conserve biodiversity and be incentivised for biodiversity enhancement and associated ecosystem service provision*
- R14:** *All biodiversity incentives and grants should be results-based, supported by monitoring and evaluation.*
- R9:** *Ireland's varied land and seascapes across and around the island must be supported, and appropriate monitoring systems designed to suit their local environment. Higher incentives and supports should be provided to prioritise the preservation and restoration of rare and threatened species.*

The challenge of reversing biodiversity loss relies heavily on the capacity to retain, enhance and restore biodiversity on farmland, in a way that is fair to farmers and effective for nature. Achieving biodiversity goals on farmland is intimately linked to the effectiveness of the programme of objectives/targets, design, incentives and monitoring. It is imperative that biodiversity objectives are SMART (specific, measurable, achievable, relevant and time-bound). Clarification of targets and indicators for different farmland habitats and species, and improved translation of conservation goals into long-term programmes that support evidence-based actions at farm- and landscape-scale is essential. There are opportunities to learn from existing best practices in relation to conservation of farmland biodiversity (R80), or from approaches developed through the Agri-Climate Rural Environment Scheme (ACRES). There are opportunities for improved quantification of the opportunity costs for farmers that act to conserve biodiversity, such that biodiversity conservation is adequately incentivised and rewarded. There may be opportunities to explore public-private partnerships, complementing policy drivers with market-based incentives for additional biodiversity benefits.

Enhanced, timely monitoring can speed up confirmation of the effectiveness of a policy or, where needed, can hasten understanding of deficiencies in the achievement of biodiversity objectives, allowing deficiencies to be rectified. Measurement of progress requires monitoring of biodiversity in the wider countryside that is regular, systematic and nationally representative e.g. Teagasc has recently completed research (collaborative project with Atlantic Technological University, funded by DAFM) on the "Development and potential application of a land use monitoring programme for high nature value farmland and forest quality and quantity in the Republic of Ireland (Carlier et al., 2023).

Locally-led, multi-actor, results-based approaches.

R6: *Local leadership, local communities and the activities of the Non Governmental Organisation (NGO) sector must be actively developed and resourced to assist the State in addressing the biodiversity crisis.*

R76: *Government departments, State and Semi State agencies shall ensure their work is done in a way which ensures collaborative planning, consultation in decision-making and implementation with farmers, local authorities and community groups. This must be underpinned by acknowledging that there is a need for local responses to local environments. Community led, peer-to-peer farming initiatives must maintain their community-led ethos once they are rolled out nationwide.*

R78: *Public incentives and payments for farmers must not restrict them in their ambition to make change for the benefit of biodiversity. All biodiversity incentives for farmers shall be results-based over the whole farm, with farmers who protect and enhance biodiversity rewarded and paid for the ecosystem services they contribute.*

Ireland is recognised as a leader in locally-led, multi-actor, results-based approaches, with examples such as the Burren Programme, AranLIFE, SUAS and a number of other European Innovation Partnership Projects (EIPs) demonstrating how they can work successfully (see O'Rourke and Finn, 2020). Although targeted to local conditions, there are general principles to be learned from locally-led, multi-actor, results-based approaches to ensure successful outcomes, including: having clear targets and objectives, having locally developed aims, implementing results-based payments, facilitating knowledge sharing between farmers; and facilitating knowledge transfer via specialised advisory support.

The Department of Agriculture, Food and the Marine (through the roll out of the ACRES co-operation projects) has demonstrated significant ambition in aiming to scale up the lessons and successes from short-term, geographically-limited projects/programmes to a regional/national scale results-based programme (e.g. ACRES co-operation approach). With scaling up comes opportunities for additional biodiversity benefits, but also additional challenges (e.g. administrative costs, overheads, human resources). There is a need for ongoing consideration of some of the challenges and solutions to scaling-up locally-led and results-based approach to maximise biodiversity benefits. It is important that farmers are included in these discussions. Using a bottom-up approach and working directly with farmers to identify achievable and practical evidence-based actions to protect biodiversity is key.

Note: whilst there are undoubted benefits with results-based approaches, there is also (on occasion) a need for more traditional action-based and/or hybrid approaches. O'Rourke and Finn (2020) highlighted that "a lesson from the [Irish] case studies is that hybrid approaches (with a combination of action-based payments, non-productive investments, and results-based payments) are likely to be more widely implemented than pure results-based approaches. Hybrid approaches can also offer an opportunity to reduce the apparent risk for farmers".

Management of freshwater ecosystems

R91: *The management of our freshwater systems requires immediate action. It requires increased level of ambition, increased resources for Water Framework Directive implementation (and therefore aquatic biodiversity protection and mitigation), a focus on water quality and aquatic biodiversity outcomes, clarity on roles and responsibilities and accountability for achievement of the outcomes.*

R95: *Riparian buffer zones, related to agriculture, forestry, industry and extractive processes and urban development must be expanded and take into account local conditions to prevent nutrient and sediment run-off. Schemes must be put in place to incentivise landowners to protect waterways, with incremental subsidies depending on the width and quality of buffer zones.*

R96: *Local and other relevant authorities must be held responsible for maintaining and improving the conditions of rivers in their areas, working with each other and with State agencies, such as Office of Public Works (OPW), Coillte, the Department of Agriculture, Food and the Marine, Inland Fisheries Ireland, industry, farmers, private landowners, community groups, etc. Furthermore, local authorities and landowners must maintain the highest standards to riparian zones along the rivers in their areas.*

The pollution of surface and ground waters represents a key environmental challenge facing agri-ecosystems. The Teagasc Agricultural Catchments Programme (ACP) has significantly enhanced our understanding of the role of soils, weather and farming practices in influencing the quality of our freshwater ecosystems. Maintaining and enhancing the quality of freshwater ecosystems requires that we build on this knowledge to ensure the appropriate spatial targeting of evidence-based and cost-effective mitigation measures. Ideally, these would be supported by decision support systems to ensure the right measure is located in the right place. Recent years has seen developments (the EPA's pollution impact potential (PIP) maps; SMARTER_BufferZ project) that can help support the optimal targeting and management of mitigation measures, within an agricultural context, for the effective management of Irish rivers. These developments have been specifically recommended in the ACRES as a tool to help target actions to areas where they will be most effective.

Coupled with decision support tools to target the right measure to the right place, the engagement between agricultural advisors and farmer is key to mainstreaming environmental issues amongst farmer stakeholders. In recognition of this, the Agricultural Sustainability Support and Advisory Programme (ASSAP) was established. This is a collaborative initiative between government and industry, put in place to support the implementation of best agricultural practice at farm level to help address agricultural pressures on water quality. Key lessons can be learned from the ASSAP approach and from recent and ongoing multi-actor projects including the ACP, the WaterEIP and the Waters of LIFE project.

Farmer training and peer-to-peer learning

R84: *Biodiversity awareness and education training programmes need to be instigated and improved across the agriculture sector, including for farmers, advisors, policy makers, food processors and retailers.*

R98: *Farmers must have access to continuous training and up to date research in actions and land management practices that protect freshwater biodiversity.*

R19: *Examples of good practice in relation to biodiversity protection and enhancement should be actively identified and supported with funding, infrastructure and other supports provided to enable replication or expansion of these practices with those who design and operate such initiatives and schemes.*

R80: *The State must support community leadership and peer-to-peer support in order to share knowledge and assist local farmers and communities to understand and replicate good biodiversity practice.*

Primary producers need tailored knowledge, integrated from diverse disciplines, on actions and land management practices appropriate to their local needs. This knowledge needs to be delivered through a variety of difference dissemination and communication channels.

Teagasc research shows that the role and attitude of agricultural advisors is key to mainstreaming biodiversity issues amongst farmer stakeholders. Farmers source environmental information from their traditional source of agricultural information such as farm management and scheme assistance. Specialist expertise can be used for upskilling and training on biodiversity, agricultural advisors can transfer clear simple directions on biodiversity management practices, engage farmers, exchange knowledge and ultimately influence attitudes and actions.

In addition, other farmers and family are key influencers on environmental decisions. Farmers play a key role in influencing other farmers' decisions, thus Knowledge Exchange Groups are powerful tools of practice change. Through Knowledge Exchange groups and by working directly with farmers, practical evidence-based actions to protect biodiversity can be identified. Teagasc Knowledge Transfer will continue to support stakeholders and engage with ongoing and developing Agricultural Knowledge and Innovation Systems (AKIS), supporting the integration of biodiversity management policy, research and practices into Knowledge Transfer activities.

Within Teagasc Education, a strong emphasis is placed on the environmental impact of agriculture and the need for sustainable farming practices to be implemented, across all Teagasc modules and courses, for example, the level and depth of teaching and learning in sustainable farming and nature/biodiversity in the 'Green cert' has increased in recent years. Furthermore, biodiversity plans have been initiated on all Teagasc agriculture college farms and research centres, with farm-based demonstrations of best practice, to inform and effect practice change among future generations of farmers.

Specific recommendations.

R8: As a matter of urgency areas and species of High Nature Value, including but not limited to the national network of Natura 2000 sites and protected species, should be protected from further degradation through the implementation and enforcement of existing legislation and directives. Management plans should also include restoration programmes.

One third of the agricultural area of Ireland is potentially High Nature Value (HNV) Farmland. As much as half of this HNV land lies outside of Natura2000 designation (Matin *et al.*, 2016; 2020). HNV systems are multifunctional systems with considerable potential to generate a range of ecosystem services and benefits for society. Despite this, HNV systems historically received a proportionally low amount of attention from agricultural and environmental policy. HNV systems have thus performed poorly in relation to economic sustainability. Ultimately, as these systems become less economically sustainable, HNV farmland land is susceptible to abandonment, intensification or alternative (more profitable) land use, all of which in turn impact environmental sustainability.

Sustainable management of HNV systems is essential to meet EU commitments on climate change, water quality and biodiversity, while maintaining rural vitality and contributing to food security. In recognition of this, improving the environmental effectiveness and economic efficiency of High Nature Value farming and forestry systems is a key objective of the Teagasc Research and Knowledge Transfer activities.

R18: In order to drastically reduce the use of pesticides by at least 50% by 2030 in line with EU policy, the State should incentivise and encourage the domestic and commercial use of natural, cost- friendly alternatives, sustainable practices and biodiversity-friendly solutions. It should also regulate the use of chemical pesticides and fertilisers, while maintaining food security. This should coincide with the improvement of schemes for the safe disposal of unused hazardous materials, as well as their containers.

Significant efforts have been undertaken in recent years to reduce the use of pesticides on Irish farms, in response to national and international policy objectives (e.g. Sustainable Use of Pesticides Directive). This has culminated in Ireland being one of very few member states that has already met its target of reducing the use and risk of chemical pesticides by 50% (along with a significantly reduction in candidates for substitution and emergency authorisation). Research undertaken by Teagasc and others, continues to assess sustainable Integrated Pest Management approaches, incorporating themes related to disease and pest control, cultural methods of control and farmer attitudes. Such approaches will support farmers and associated stakeholders in their efforts to enhance the environmental sustainability of agri-systems. Coupled with research, Teagasc Education (e.g. Professional Diploma in Integrated Pest Management and Sustainable Use of Pesticides) and Knowledge

Transfer activities (e.g. Pesticide Application Training), will continue to support the professional development of farmers and the wider agri-industry to utilise sustainable solutions.

R57: The State must establish a public information campaign to promote the benefits of buying local and seasonal produce

The National Strategy for Horticulture aims to "increase consumer demand for local, in season, fresh, quality fruit and vegetables and Irish plants by educating consumers of all ages on the benefits of eating more and local fresh fruit and vegetables". Bord Bia is leading on this action in conjunction with Teagasc and other stakeholders. Furthermore, Teagasc is a key partner in the Horizon Europe AgroBRIDGES project, which aims to develop knowledge and tools to support Short Food Supply Chains. Through these examples (and similar activities), Teagasc will support the dissemination of information on the benefits of buying local produce.

R67: The State must create, publish and maintain an integrated habitat, species and land-use map for the island of Ireland to identify habitat loss and improvement, to support local community awareness and to inform policies and actions of state bodies and organisations.

There are significant knowledge gaps in relation to the status of biodiversity (e.g. habitat quantity and quality) at a national scale. This remains a fundamental barrier to assessing the scale of biodiversity decline and addressing the drivers of biodiversity decline in an agricultural context. Comprehensive efforts have been undertaken in recent years to address some of these gaps, most recently in the development of the National Land Cover Map. However, there remains a need for regular, systematic national-scale data collection programmes, especially for areas outside of Natura2000. Collecting, managing, sharing and analysing ecological and environmental data plays a key role in halting and reversing the decline in biodiversity. Gathering robust and representative baseline data in relation to the quantity and quality of habitats and species can help policy-makers, researchers, advisors and farmers target appropriate advice, mitigation and supports (e.g. right measure: right place). In addition to research projects that have monitored farmland habitats, Teagasc has conducted pilot projects to investigate the collection of additional information on farmland habitats as an indicator within the Teagasc National Farm Survey (NFS). The NFS is a powerful, long-running (50 years) survey of c. 1,000 farms across all main enterprises which is nationally representative and which collects data of a very high standard. It was established as a requirement of EU membership and provides Irish data for the European Farm Accountancy Data Network. Work is now underway to incorporate such an indicator of farmland habitats in the Teagasc National Farm Survey, and the Teagasc Small Farms Survey. Results based on these indicators would form part of future Teagasc Sustainability Reports that are published by the National Farm Survey. This development is in line with the EU Farm to Fork objective

to turn the Farm Accountancy Data Network into a Farm Sustainability Data Network. The National Farm Survey could be a very important means of providing representative reliable data about the state of biodiversity on Irish farms.

R87: In line with EU Soils Strategy, a National Centre for Soil Science must be established based on up-to-date technology where soil testing of physical, chemical and biological properties of soil is subsidised for farmers.

Teagasc have a long history of expertise in soil science, soil analysis and interpretation, which continues to the present day, and it already is a national centre of excellence in soil science. Teagasc have led the development of a range of nationally important soil resources and datasets, which include the National Soil Information system (SIS), and the Soil Quality Assessment dataset (SQUARE), and are currently working with the Geological Survey of Ireland to enhance the soil information in the national soil TELLUS programme that is generating geochemical and geophysical soil data. Teagasc are also involved in the development of new proximal sensing technologies that would make soil analyses more high throughput and cost effective. Additionally, they have a research programme focused on assessing and managing the biological health of soils, including the development of innovative approaches for assessing soil biodiversity. Teagasc researchers are actively engaged in European efforts to develop indicators and soil health thresholds that could be applied in Irish soils, and are carrying out extensive sampling of Irish soils through programmes such as the Signpost demonstration farms and the Agricultural Catchments programme. While a national monitoring programme for Irish soils that tests the physical, chemical and biological properties of Irish soil is not available currently, Teagasc is well placed to support such efforts if a monitoring programme is established in the future.

R90: The State must encourage use of multi-species mixtures and phase out use of monoculture grass seed mixtures.

Agriculture in Ireland is heavily reliant on perennial ryegrass-based swards due to their relatively high productivity and nutritive value, thus phasing out the use of monoculture grass seed mixes requires a concerted industry-wide effort. The use of multispecies grasslands offers benefits such as enabling more forage to be produced using less nitrogen fertiliser whilst improving biodiversity. Research has shown that both beetle and wasp numbers increased with multispecies swards and it was found an increase in earthworm population (an indicator species for soil health and biodiversity).

Efforts to phasing out of monoculture grass seed mixtures are already underway. As part of the 2023 Nitrates Derogation Terms and Conditions, grassland management requires that “Clover must be incorporated when reseeding swards on derogation farms. All new grass reseeds on the grassland farm must incorporate at least 1.5kg/ha of naked clover seed or at least 2.5kg/ha of pelleted clover.” There has been a significant increase in seed sales of both

white and red clover (200% and 340%, respectively) in the last 2 years as a result of policy, research and KT activities.

In addition to a long-running grass-clover research and advisory programme (e.g. Grass10), Teagasc has an ongoing research programme focusing on the multi-functional role of multi-species mixtures. Research to date (by Teagasc and others) has highlighted the potential of multi-species swards to produce higher dry matter yields from lower nitrogen fertiliser inputs. This provides a more environmentally sustainable production system, allowing for increased carbon sequestration while simultaneously reducing emissions of nitrous oxide, increasing drought resilience and improving indicators of soil health and biodiversity.

In recognition of the value of multi-species mixtures in reducing emissions, multi-species mixtures are included as a mitigation measure as part of the Teagasc Greenhouse Gas Marginal Abatement Cost curve (MACC), and are being promoted in the Teagasc Signpost Programme.

R123: A new national strategy for the protection, maintenance, restoration and expansion of Ireland's network of hedgerows must be developed urgently. Existing legislation and regulations regarding hedgerows must be reviewed, strengthened and fully enforced, with due regard to public safety. Sufficient results-based incentives must be made available to support all aspects of their proper management. In particular, the new CAP schemes should recognise and reward good hedgerow quality

R130: Hedge management courses and certification should be reintroduced and it should be a requirement that all hedge cutting contractors and their employees complete such courses, and be licenced

Hedgerows are a dominant semi-natural habitat in the Irish landscape (Rotches-Ribalta et al., 2021). They are the primary linear feature on many Irish farms, thus they are important refuges for biodiversity within agricultural landscapes. Coupled with their role in supporting biodiversity, good quality hedgerows play an important role in the delivery of wider ecosystem services including carbon sequestration (Black et al., 2023) and water quality (Sherriff et al., 2019). Despite their ubiquitous appearance within the Irish landscape, recent studies (Larkin 2019, MacElwain et al., 2021) indicate that the majority of sampled hedgerows were of low quality (unfavourable condition).

Results-based approaches have the potential to support the delivery of high quality, multi-functional hedgerows (see earlier comments). It is important that when developing result-based approaches for hedgerows, that the wider ecosystems services that hedgerows deliver (e.g. carbon sequestration) are also considered and valued (see R15).

Note: As part of Hedgerow Week, Teagasc has held and will hold further best practice demonstration events targeted at contractors. There are permanent hedgerow demonstration sites on Teagasc farms including new hedges at different stages of development and existing hedges showing best practice management.

Further comment

A number of recommendations within the report demand a multi-agency response (e.g. recommendations relating to: National Biodiversity Action Plan (R21, R25, R26), pollinators (R49); prescribed burning (R118); invasive species (R137, R138)).

Teagasc has long experience of engaging with multi-actor, multi-agency groups, to help design and shape strategies and management plans for biodiversity. Such engagement has also resulted in Teagasc committing to support (as appropriate) the implementation of relative actions and measures derived from multi-agency strategies and management plans. Teagasc will continue to engage with the relevant authorities and stakeholders to further revise and develop multi-agency responses to specific biodiversity objectives.

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Appendix 1

Biodiversity within Teagasc

Teagasc activities to address the biodiversity emergency are integrated across Research, Knowledge Transfer and Education, specifically:

Teagasc Research:

Teagasc Research on biodiversity* includes the following objectives:

1. Enhance biodiversity in agricultural systems across a gradient of intensities and enterprises
2. Development of effective indicators and implementation of farm-scale assessments of sustainability that include farmland wildlife.
3. Improving the environmental effectiveness and economic efficiency of management plans for High Nature Value farming and forestry systems.
4. Improving the understanding of the relationship between diversity and ecosystem function within agricultural systems.

*See Appendix 2 for a subset of relevant research projects.

Teagasc Knowledge Transfer:

Significant advisor capacity building on biodiversity has been achieved in recent years through the Teagasc Environment KT Programme and advisor involvement in REAP, Agri-environment Training Scheme, Hen Harrier Project, Pearl Mussel, Project, Wild Atlantic Nature LIFE Project, NPWS Farm Plan Scheme Burren Programme and other biodiversity initiatives. The use of the Teagasc Biodiversity Management Practices Self-Assessment Tool: Linear Habitats enables effective biodiversity Knowledge Transfer by agricultural advisors. There is ongoing media engagement including a high profile Teagasc Hedgerow Week.

Farmers play a key role in influencing other farmers' decisions, thus Knowledge Exchange Groups are powerful tools of practice change. Teagasc KT plays an important role here, supporting the integration of biodiversity management policy into Knowledge Transfer groups through: European Innovation Programme (EIP) projects (e.g. Comeragh Upland Communities), LIFE projects and other Knowledge Exchange groups.

The Teagasc Signpost Programme is a multi-annual campaign to lead climate action by all Irish farmers. The programme aims to achieve early progress in reducing gaseous emissions from Irish agriculture, improve water quality and biodiversity. It operates through a network of over 120 farms throughout the country, which will demonstrate best practice in environmental standards.

Teagasc leads engagement with stakeholders in the agri-environment industry. A weekly Signpost webinar has a regular audience of 300 – 400 people since 2020, delivering up-to-date information and inspiration on biodiversity, water quality and climate change. A National

Hedgerow Week, initiated and led by Teagasc has put a focus on hedges for farmers, contractors and the general public.

Teagasc Education:

Teagasc plays a critical role in the delivery educational material and training on biodiversity within Teagasc college courses and by incorporating modules on Agricultural Sustainability (incorporating ecological sustainability) within 3rd level Agriculture Programmes.

Teagasc education staff, and their colleagues in the private agricultural colleges, work closely with environmental specialists, the Teagasc Signpost Programme, and the Teagasc Climate Centre, to develop their skills and knowledge in relation to best practice in environment and sustainability.

Additionally, Biodiversity Plans have been initiated on all Teagasc agriculture college farms, with farm-based demonstrations of best practice to inform and effect practice change among future generations of farmers.

Appendix 2: Subset of recent, current and forthcoming research projects related to the Teagasc Biodiversity and Agri-Ecology sub-programme.

Project title	Teagasc role	Status
• Assessment of Green Cover Requirements: Implications for farmland birds. AGRI-Birds	Lead	Ongoing
• Water Quality Tools		
• Designing Effective Agri-Environment Measures for Solitary Bees in Ireland	Lead	Ongoing
• LegacyNET: Investigating the benefits of multispecies grassland leys	Lead	Ongoing
• Agronomy of multi-species mixtures	Lead	Ongoing
• Microbial communities in multi-species mixtures	Lead	Ongoing
• GHGs from multi-species mixtures	Lead	Ongoing
• Assessment of Ecological Focus Areas	Lead	Ongoing
• Farm habitat recording within the Teagasc National Farm Survey	Lead	Ongoing
• WaterEIP	Collaborator	Ongoing
• Waters of LIFE	Collaborator	Ongoing
• BRIDE EIP: Biodiversity Regeneration In the Dairying Environment	Collaborator	Ongoing
• Caomhnú Árann EIP	Collaborator	Ongoing
• Curlew EIP	Collaborator	Ongoing
• Great Yellow Bumblebee EIP	Collaborator	Ongoing
• FARM_ECOS: Farming and Natural Resources: Measures for Ecological Sustainability	Lead	Completed
• FarmCARBON: Hedgerows and other non-forest woodland carbon	Lead	Completed
• SmarterBufferZ: Specific Management and Robust Targeting of Riparian Buffer Zones	Lead	Completed
• COSAINT: Cattle exclusion from watercourses: Environmental and socio-economic implications	Lead	Completed
• LEAP: Livestock Environmental Assessment and Performance (LEAP) Partnership	Lead	Completed
• Enhancing and maintaining biodiversity on intensively-managed farming systems	Lead	Completed
• HNVFarmForBio: High Nature Value Farmland and Forestry	Collaborator	Completed
• EU SmartAgriHubs	Collaborator	Completed
• IdealHNV: Identifying the Distribution and Extent of Agricultural Land of High Nature Value	Collaborator	Completed
• KerryLIFE: Conservation of the Freshwater Pearl Mussel	Collaborator	Completed
• AranLIFE: The sustainable management of terrestrial habitats of the Aran Islands.	Collaborator	Completed
• BurrenLIFE: Delivering for farming and wildlife.	Collaborator	Completed
• FLINT: Farm Level Indicators for New Policy Topics (FLINT)	Collaborator	Completed
• AE Footprint: Assessment of agri-environment schemes: the Agri-Environmental Footprint Index	Collaborator	Completed
• Animal Change: Testing the benefits of grassland mixtures under experimental drought	Collaborator	Completed
• E-ruminant: Sustainability indicators for farmland wildlife	Collaborator	Completed

Submission by The Burrenbeo Trust to the Joint Committee on Environment and Climate Action

Compiled by Brendan Dunford, October 19th 2023

Burrenbeo Trust is a registered charity based in the Burren but, through programmes such as Farming for Nature, Heritage Keepers and The Hare's Corner, reaches out to a National Audience.

With over 20 different programmes delivered annually, the focus of much of Burrenbeo's work relates to two key, interrelated themes: place-based learning and community stewardship. This is based on our conviction that engaging and empowering communities – farmers, schoolchildren, local residents and others – to become active custodians of their local landscapes is one of the most sustainable and cost-effective solutions to dealing with our biodiversity and climate crises.

Regarding the recommendations as set out in the report of the Citizen's Assembly:

1. We wholeheartedly welcome the report by the Citizen's Assembly and strongly support its recommendations. While some recommendations are indeed very challenging, we feel that the level of ambition shown is urgently needed at this time of environmental crisis.
2. We feel that, to reverse biodiversity loss, we need to prioritise action, in parallel with on-going education, research, planning and monitoring. We need to create more accessible, attractive opportunities for individuals and communities to take positive action for nature.
3. We believe in the potential of communities, particularly farmers and landowners, to be the key agents in delivering the change we urgently need to restore nature but we need to do much better to support these communities – pocket, head and heart - to take action.

We would like to draw particular attention to the following recommendations in the report:

14. All biodiversity incentives and grants should be results-based, supported by monitoring and evaluation.

15. People in primary production industries should implement practices that conserve biodiversity and be incentivised for biodiversity enhancement and associated ecosystem service provision.

While we fully support these recommendations, we feel that greater attention needs to be paid to the structure of result-based payments to ensure they provide a meaningful incentive to landowners to improve biodiversity. The Burren Programme – with its banded, degressive, result-based payment structure and its co-funding for bespoke conservation support works – was an exemplar in this regard. We also feel that additional funding mechanisms are needed 'beyond CAP' – for instance from private sector or from other public funds – to support this work. We also believe that to make a real impact, support schemes for farmers and landowners need to be longer term (>10 years).

47. The State must provide a streamlined and easily accessible system of small grants, information and support for the public to undertake biodiversity action on residential properties.

48. The State must provide funding and infrastructural supports to local community and voluntary groups, etc.

We support these recommendations and strongly recommend, for greater consideration in this regard, the Burrenbeo programmes Heritage Keepers www.heritagekeepers.ie and The Hare's Corner www.burrenbeo.com/thc as proven, low-cost, high-impact models through which individuals and communities can avail of advice, guidance and hassle-free funding to undertake meaningful actions which will enhance their local biodiversity and heritage.

52. The value of NGOs engaged in biodiversity should be recognised in early consultations on all relevant plans, policies and projects.

53. NGOs engaged in biodiversity should be appropriately funded in the short, medium and long-term to undertake targeted schemes with measurable outcomes & strict accountability measures.

54. Core funding should be provided for collaborative work between NGOs and their partners.

As an Environmental NGO Burrenbeo Trust has survived for over two decades thanks to the passion and commitment of its staff and volunteers, and the generosity of its funders. During this time we, and other ENGOs, have delivered a huge service to society at a very low cost - and with a growing administrative burden due to new governance rules. Given the growing importance of this work, and the value offered by NGOs, we feel that additional resources should be invested in the core funding of NGOs – on the condition that they deliver - and that this support should be multi-annual in nature.

58. Local authorities should play a central role in informing people of the importance of biodiversity in their areas.

60. The Natura 2000 sites provide opportunities for education for local communities. A programme should be established to promote awareness of the importance and vulnerabilities of these sites.

While we agree with the general points, we feel that (a) local authorities are just one of the organisations which need to be involved in this central role and (b) we feel that N2000 sites are just one (special) part of our natural heritage but that nature is found everywhere and reconnecting people with their local place – be it a N2000 site or an urban environment - is essential.

Furthermore, we feel that education should be more rounded to include other aspects of our cultural and built heritage – focussing on ‘place’ in all its richness and interconnectedness rather than just on biodiversity. We need to foster a greater sense of connection, love and care for nature and place.

76. Government departments, State and Semi State agencies shall ensure their work is done in a way which ensures collaborative planning, consultation in decision-making and implementation with farmers, local authorities and community groups. .. (The Burren Programme and the BRIDE projects provide potential templates.)

We fully agree with this recommendation but regret that it hasn't been borne out in the development of the ACRES scheme. While we welcome the ambition of ACRES in scaling the result-based payment approach, we regret the loss of flexibility afforded to local teams to co-create solutions with farmers to meet the unique needs of disparate local landscapes, and also the reformed payment structure which has limited the incentive for farmers to improve their environment.

80. The State must support community leadership & peer-to-peer support in order to share knowledge and assist local farmers and communities to understand and replicate good biodiversity practice.

We strongly agree and would recommend support for the ongoing expansion of the Farming for Nature Project www.farmingfornature.ie whereby farmers are celebrated and supported by their peers (e.g. through ‘the horse’s mouth’ initiative) to meet the climate and biodiversity challenge.

83. People must be encouraged to consume a more plant-based diet.

We suggest that wording could be added here: ‘people should also be more aware of the provenance of the meat they consume, and encouraged to source it from family farms of high nature value’.

Finally we hope the Joint Committee recognises not just the challenges posed by the implementation of the report’s recommendations, but also the massive opportunities which this would generate, making Ireland a world-leader in sustainability and helping safeguard our green credentials.

Ref: CCA-I-2023-565

Gina Long
Clerk to the Committee
Joint Committee on Environment and Climate Action

31 October 2023

Dear Ms Long,

Thank you for your letter dated 4th October on behalf of the Joint Committee on Environment and Climate Action. I would like to acknowledge and thank the committee for its work in considering the recommendations of the Citizens' Assembly report on Biodiversity Loss. Coillte is pleased to have the opportunity to make the following submission and we hope that the details provided are helpful to the committee as part of its review.

Coillte recognises that climate change and biodiversity loss are some of the greatest challenges of our time. The Irish forestry sector and Coillte, as Ireland's state forester, have an important role to play in the achievement of Ireland's climate action commitments and the protection of biodiversity, as outlined in the current Programme for Government. The strategy we are currently implementing has at its core a highly proactive approach to improving Ireland's biodiversity. In the short term we are increasing our forest estate to be managed primarily for biodiversity and nature from 20% to 30% (an additional 44,000 hectares) by 2025. In the longer term we plan to transform and redesign an additional 70,000 hectares of existing forests such that 50% of our estate is managed primarily for biodiversity and nature.

Against that backdrop, Coillte was delighted to have been invited to participate in the Citizen's Assembly on Biodiversity Loss. In advance of the Assembly, we shared a submission for citizens, which outlined Coillte's approach to the protection and enhancement of biodiversity, including the work of Coillte Nature which is solely devoted to the delivery of nature and biodiversity restoration and rehabilitation projects across Ireland. The submission also highlighted the importance of balancing the multiple objectives of forests for climate, nature, wood, and people. A copy of this submission is attached for reference (see Attachment 1).

On 15th October 2022, Coillte presented to the Citizen's Assembly outlining further details in relation to its ambitions to protect and enhance biodiversity and we participated in a Q&A session with those present on the day. A copy of this presentation is also attached (Attachment 2).

For context, Coillte's purpose is to manage the state forests on behalf of the people of Ireland. Our mission is to deliver the multiple benefits of our forests to society. Since Coillte was established in 1989 it has enabled a vibrant forestry sector that supports rural employment across Ireland.

Coillte has two shareholders, the Minister for Agriculture, Food and the Marine and the Minister for Public Expenditure and Reform. The Government's expectations of Coillte are outlined in the Forestry Act 1988 and the Shareholder Letter of Expectations, which is also attached (Attachment 3).

Coillte, Dublin Road, Newtownmountkennedy, Co. Wicklow, A63 DN25, Ireland.
T 0818 367 378 E info@coillte.ie W www.coillte.ie

In the Shareholder Letter of Expectations, Coillte is specifically tasked with delivering actions which would help to achieve the goals outlined in the Climate Action Plan and the National Biodiversity Strategy. Coillte is also asked to continue to provide safe and sustainable public access to the nation's state forests, and to invest in the creation of further recreational areas in support of local communities and tourism. It also highlights the need for Coillte to be viable, and to supply wood products to grow the bio-economy.

These expectations are reflected in Coillte's strategic vision for the forest estate (announced in April 2022), which outlines our ambitions to sustainably balance and deliver the multiple benefits from Ireland's state forests across four strategic pillars: forests for climate, forests for wood, forests for nature, and forests for people. Among the actions that we propose to deliver as part of this new forestry strategic vision are:

For Climate:

- Enable the creation of 100,000 hectares of new forests by 2050, with half of these new forests being native woodlands, supporting the delivery of the national afforestation target and creating a carbon sink of 18 million tonnes of CO₂.
- Manage the existing forest estate to capture an additional 10 million tonnes of CO₂ in Coillte's forests, soils and wood products by 2050.
- Redesign 30,000 hectares of peatland forests by 2050 through a programme of rewetting or rewilding for climate and ecological benefits.
- Produce sustainable wood products that displace 2.2m tonnes of CO₂ per year by substituting carbon-heavy products such as concrete, steel and plastic.
- Enable the generation of an additional one gigawatt of renewable wind energy by 2030, enough to power half a million homes in Ireland, via our joint venture company FuturEnergy Ireland.

For Wood:

- Produce a sustainable supply of 25 million m³ of Irish certified timber that can help Ireland achieve its housing ambition of 300,000 new homes by 2030.
- Promote the use and benefits of wood products to help increase the level of timber homes from 20% to 80% by 2050.
- Develop innovative wood products to meet the growing demand for sustainable materials to support the bioeconomy.

For Nature:

- Enhance and restore the existing biodiversity on the estate (90,000 hectares; 20%) to improve its ecological value.
- Increase the area of its forest estate to be managed primarily for nature from 20% to 30% (an additional 44,000 hectares) by 2025.
- Transform and redesign an additional 70,000 hectares of existing forests, to create new semi-natural wilderness, providing valuable habitats, targeting that 50% of Coillte's estate is managed primarily for nature in the long-term.

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For People:

- Support the creation of 1,200 direct and indirect new jobs in rural communities to enable the just transition to a low carbon economy in Ireland.
- Enable the investment of €100 million to create world class visitor destinations by 2030 to support the growth in tourism and recreation in Ireland.
- Double the number of recreation areas to 500 nationally, enhancing local communities and contributing to people's wellbeing.

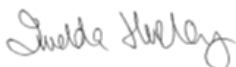
We believe that our strategic vision, which aligns with our Shareholder expectations, clearly demonstrates that climate action and the protection and enhancement of biodiversity are fundamental to Coillte's role and objectives.

It is important to note that the financial sustainability of Coillte is integral to Coillte achieving its purpose and to ensuring that biodiversity protection and enhancement of the estate is realised. Furthermore, from a climate and housing delivery perspective, it is imperative that Ireland increases the use of wood in the built environment and that Ireland is self-sufficient to meet our growing wood demand from forests in Ireland, thus taking pressure off old-growth forests elsewhere in the world.

As we move forward, our focus is on the achievement of our ambitions and the delivery of our strategic vision which is a long-term plan to 2050 and beyond.

Once again, thank you for the opportunity for Coillte to outline its perspective. If you have any questions in relation to our submission, please do not hesitate to contact me.

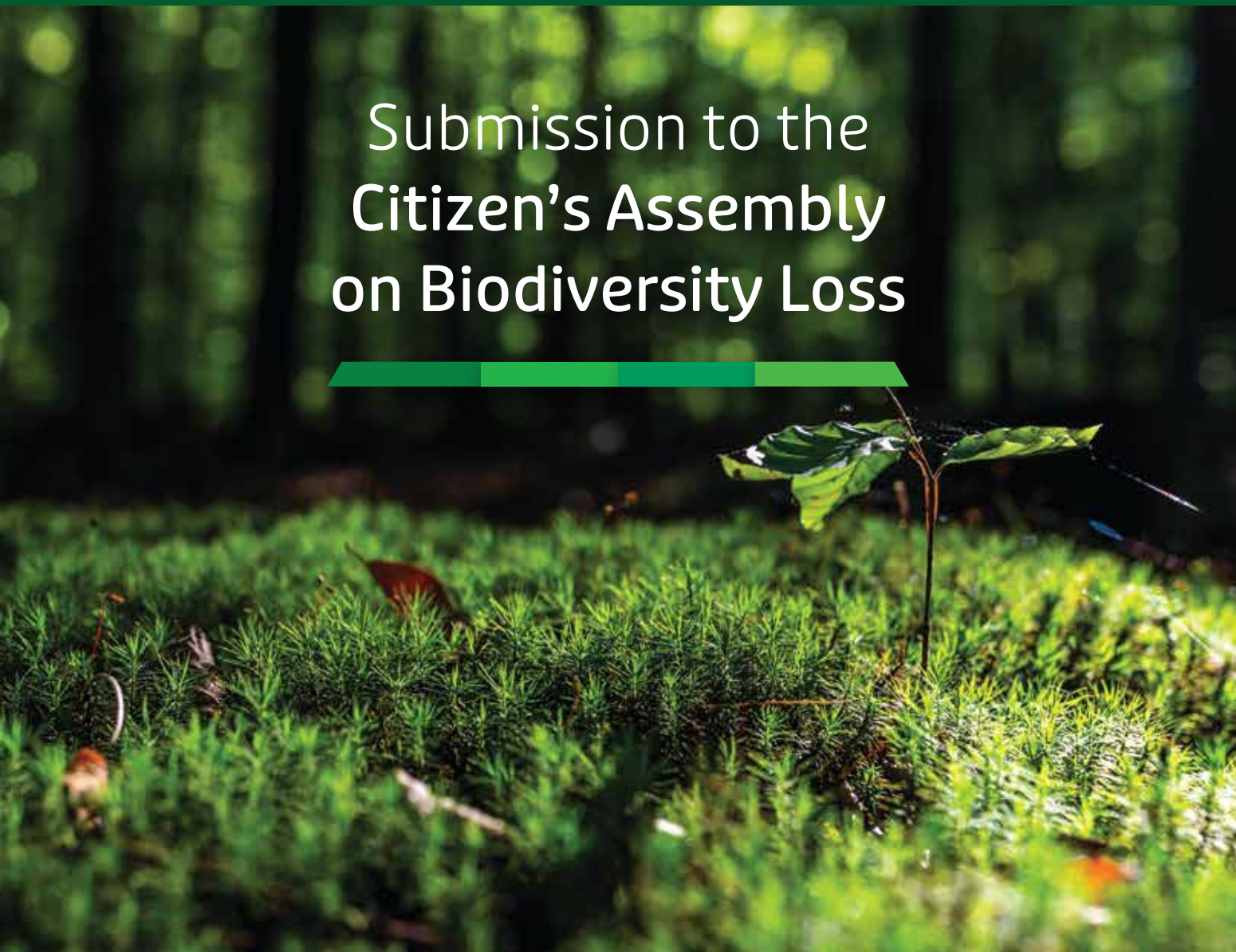
Yours sincerely,



Imelda Hurley
Chief Executive



Submission to the
Citizen's Assembly
on Biodiversity Loss



Submission to the **Citizen's Assembly on Biodiversity Loss**



Pat Neville

Communications Manager
Coillte Forest

Narration

Hello and thank you for listening to Coillte's submission to the Citizen's Assembly on Biodiversity Loss.

My name is Pat Neville. I'm an ecologist working in Forest Communications for Coillte and I'd like to take you through this presentation.

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- *Provide Sustainable Timber*
- *Increasing Forest Recreation*

Balancing Multiple Objectives: The Right Objective in the Right Place with the Right Trees

Narration

First, for context, we'll look quickly at the history of forests in Ireland and...

- I'll talk briefly about Coillte in terms of who we are and what we do
- then we're going to explore the need for change and what people would like to see going forward
- we'll examine the role of forests – Specifically...
- Coillte's Biodiversity Areas, Biodiversity Challenges, Measuring Biodiversity, Enhancing and Restoring Biodiversity, Increasing Biodiversity and the role of Coillte Nature
- We'll look at the benefits of trees and forests for Climate and Climate Change
- we'll look at the benefits of trees for wood and wood products
- and finally, we'll focus on the importance of balancing the multiple objectives of Forests for Climate, Nature, Wood and People – delivering The Right Objective in the Right Place with the Right Trees.

History of Forests in Ireland



c.10,000 years ago
First forests began to appear in Ireland



c. 6,000 years ago
Irish forests were at their peak, covering most of the island



c. 5,000 years ago
Ireland's forest cover declined

Narration

So looking back for a moment - Ireland has a unique forest history.

The first forests began to appear in Ireland at the end of the last ice age about 10,000 years ago.

And About **6,000 years ago Irish forests were at their peak** covering most of the island and supporting mega-fauna like bear and wolves.

With the arrival of man, about **5,000 years ago, Ireland's forest cover declined.**

History of Forests in Ireland



18th & 19th centuries

Forests were cleared for agriculture and industry



At start of 20th century

<1% of Ireland was under forest



Early 1900s

State commence a tree planting programme

Narration

The rate of deforestation was **most significant during the 18th and 19th centuries** as forests were cleared for agriculture and industry.

The impact of this was that at the start of the **20 century less than 1% of Ireland was under forest.**

In the early **1900's the state intervened** and started tree planting programmes.

History of Forests in Ireland



2022

11% of Ireland is now forested
70% coniferous trees
30% broadleaf trees



Ireland's conifers, mixed and native woodlands support Irish plant and animal communities



Are estimated to store over 300 million tonnes of carbon

Narration

As a result of those programmes, today about 11% of our land is now forested, with coniferous trees accounting for around 70% and broadleaved trees, the other 30%. About half of all our forests are state owned with the remainder in private ownership.

The modern forests of today are very different to the native forests of prehistory, but they do provide **important habitats for many native animals and plants**. Ireland's conifers, mixed and native woodlands support populations of important, Irish plant and animal communities.

Our forests also play an important role in helping to tackle climate change, with **our forests estimated to store over 300 million tonnes of carbon**.

History of Forests in Ireland



Provide over 3 million cubic metres of wood-products used in constructing our homes



Support over 9,000 rural based jobs



Are a great place for people to enjoy nature and get some exercise
29M visits to Ireland's forests per year

Narration

Our forests also play an important role in helping to tackle climate change, with our forests estimated to store over **300 million tonnes of carbon**.

Our forests also provide **over 3 million cubic metres of wood-products** which are used in constructing our homes and which support over **9,000 rural based jobs**.

And our forests are also a great place for people to come to enjoy nature and get some exercise, with over **29 million visits to Irish forests each year**.

About Coillte



Narration

In 1989, Coillte was established to manage the State forests of Ireland. Today, Coillte manage over 440,000 hectares of forests and land, which is around 7% of the total area of Ireland. We manage our forests sustainably and have been independently certified by the Forest Stewardship Council (FSC) since 2001. Our mission is to manage and deliver the multiple benefits from our forests.

We are **the largest supplier of certified timber and wood products in Ireland**, which supports a vibrant forestry sector. Our two panel-board mills in Waterford and Clonmel produce important OSB and MDF wood products.

We protect important species and habitats across all of our lands and we have **20% of our total area managed primarily for nature and biodiversity.**

We have an open forest policy which covers over **6,000 forests across the country** meaning they can all be accessed by the public for recreation. So that is a very high-level summary of Coillte.

Need for Change: What Change do People Want?



Concerned about Global Warming

85% are concerned about Global warming



Forests for wood are good

86% think that wood producing forests are a good thing



Biodiversity is important

82% believe that biodiversity is important for Ireland's future. 56% believe that it is very important



Forestry is important to the economy

82% believe Forestry is an Important Sector For the Irish Economy



People want more trees

85% want to have more trees in Ireland, both broadleaves and conifers



Coillte have a role to help with Climate Change

84% think that we have a role in meeting Ireland's climate change commitments

Narration
















To understand more about people's expectations of forestry and the need for change, Coillte recently conducted research asking the public their views about the role of forests.

The results were very clear.

- People are very concerned about global warming and biodiversity loss
- 85% are concerned about Global Warming while
- 82% believe that biodiversity is important for Ireland's future and 56% believe its is very important
- People believe that forests can play a positive role, and they agree that we must plant more trees
- People also believe that our forests are important to produce wood and support jobs, and that there should be a greater use of sustainable wood products
- 82% believe forestry is an important sector for the Irish economy
- And 84% think Coillte has a role to help with Climate change.

It is clear that people believe Forests have many roles to play in meeting the needs of Society.

Role of Forests: The Multiple Values of Forests

UN GOALS		FOREST VALUES	
	Good Health and Wellbeing		Climate Change Mitigation
	Clean Water and Sanitation		Water and Soil Protection
	Affordable and Clean Energy		Nature and Wildlife Habitats
	Work and Economic Growth		Sustainable products
	Innovation and Infrastructure		Health and Wellbeing
	Sustainable Construction		Rural Economy and Jobs
	Consumption and Production		
	Climate Action		
	Life On Land		

Narration

So, looking at the role of forests in more detail:

- forests deliver multiple values that support nine of the UN Sustainable Development Goals,
- forests can help us with climate change mitigation,
- and water and soil protection,
- they provide homes for nature and wildlife,
- they give us sustainable climate friendly construction products ,
- and they also are important for our health and well being, providing spaces to reconnect with nature,
- finally, they also support our rural economy and jobs.

Role of Forests: The Multiple Values of Forests



for Climate



for Nature



for Wood



for People

Narration

These values can be summarised in four main objectives – Climate, Nature, Wood and People.

So it is clear that the role of the Forester must be to try to balance these multiple objectives of Climate, Nature, Wood and People.

And this is the challenge. Although there are many “synergies” in delivering ‘values’ from our forests, for example fast-growing trees are good for wood production and are good for climate change; there are also “trade-offs” where slower growing native trees may be better for enhancing biodiversity but do not sink CO₂ as quickly.



Narration

Coillte is aiming to deliver more from our forests, whilst making sure we do so in a balanced way, and this is what is trying to achieve in our new strategic vision.



Narration

For Nature we want to increase the amount of our Forests we manage primarily for biodiversity, and we want to increase the biodiversity value of these areas through enhancement and restoration projects.

For Climate we want to sink more CO₂ by creating new forests through a programme of afforestation and we also want to improve the carbon store in our existing forests.

For Wood we want to continue to supply sustainably certified and renewable timber, and promote the greater use of wood products, to grow the Irish bioeconomy and reduce our dependency on carbon heavy construction materials.

For People we want to increase the amount of recreation sites across the country, and also support local communities and tourism.

In summary, guided by these four over-riding objectives, climate, nature, wood and people - our approach is to ensure we set the Right Objective, because once this is understood, it is much easier to determine the Right Tree.

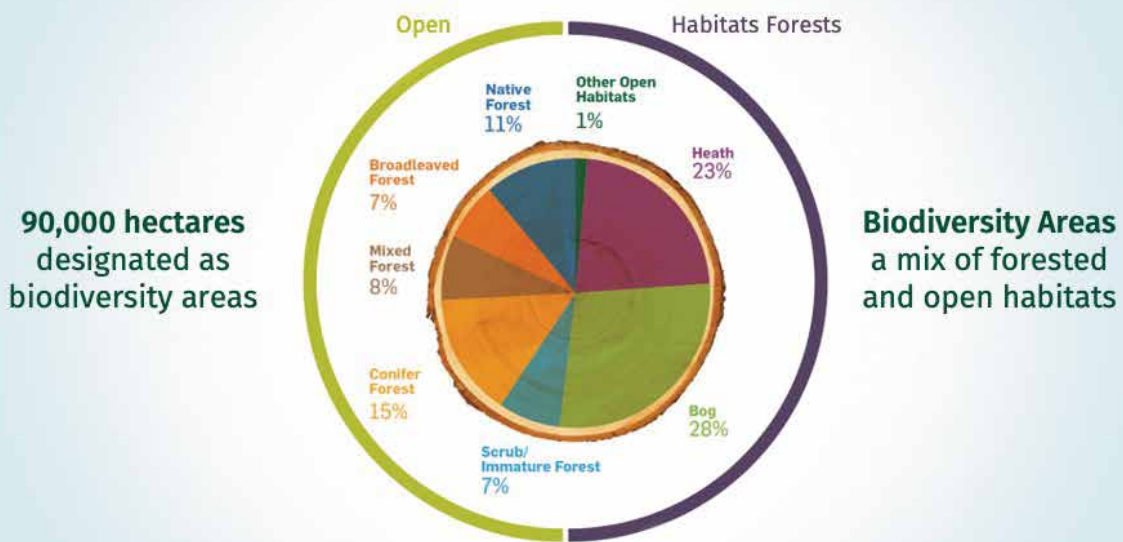


Forests *for* Nature

Narration

Forest for Nature

Forests for Nature: Coillte's Biodiversity Areas



Narration

The Coillte estate consists of a varied tapestry of different habitats, ranging from conifer forests and mixed or broadleaved forests; to open bogs and heathlands; and lakes and rivers. Our forests are also home to many of Ireland's wild animals and plants.

In 2001 we started working with ecologists who recommended the areas in our forests with the best value for biodiversity.

The outcome of this work was that **90,000 hectares (about 20% of the estate), in more than 2,300 sites, were designated as biodiversity areas, which would be managed primarily for Nature.**

Our biodiversity areas are a mix of forested and open habitats, from native woodlands, to broadleaved and mixed forests to conifer forests while our open habitats include areas of uplands, heaths and bogs.

The expansion in forest cover over the past decades has benefitted some species, and we have seen a striking increase in the numbers and spread of animals like the red squirrel and pine marten nationwide.

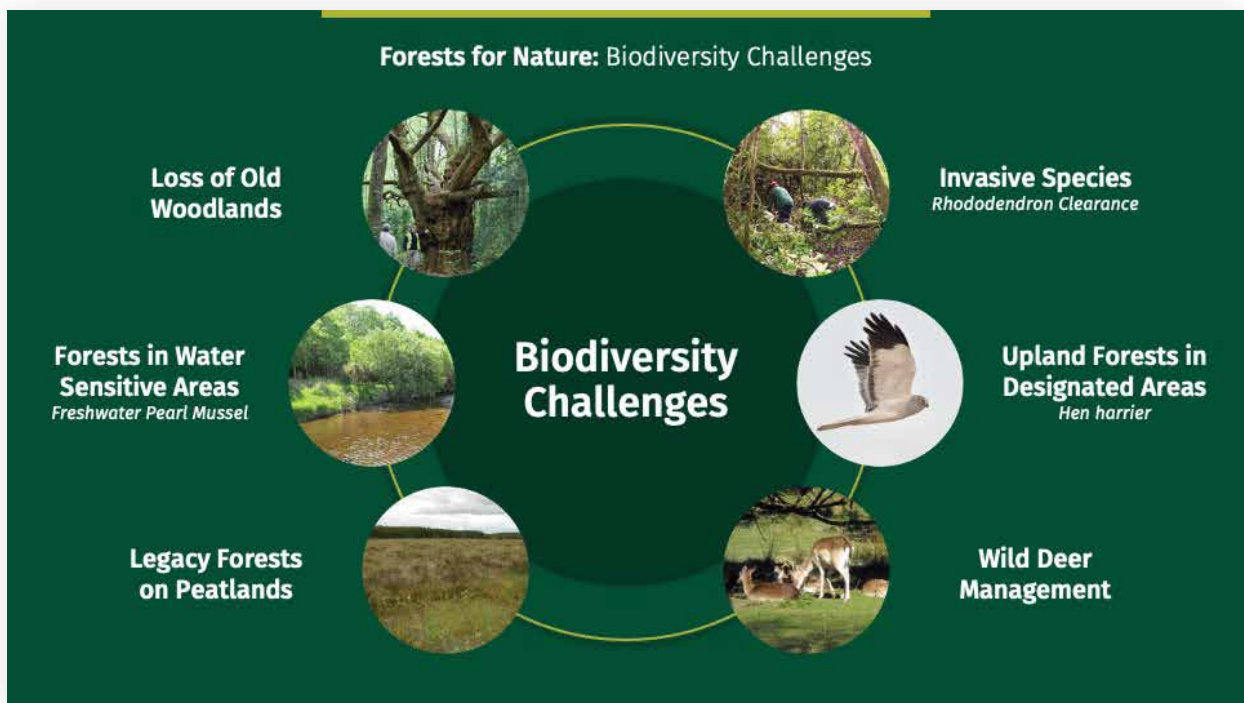
Other bird species have benefitted too, with the introduced red kite population expanding its range and more recently the surprise arrival of the woodpecker back into Irish forests.

Forests for Nature: Biodiversity in our Forests



Narration

Here's some examples of the range of biodiversity areas, in our forest estate - native, mixed, broadleaved and coniferous forests and upland heaths, bogs and limestone pavement.



Narration

But there are challenges to biodiversity that need to be addressed.

- Invasive species, like Rhododendron, Japanese knotweed, Cherry Laurel and Gunnera pose a huge risk to our natural habitats and species.
- Upland bird species such as the hen harrier continue to decline in number and require sensitive management.
- Wild deer numbers, with no natural predators remain unsustainably high, applying increased grazing pressure and preventing native woodland regeneration.
- We also have legacy forests, planted on peatlands in the last century, largely for social reasons but today now pose carbon emission risks.
- Other legacy forests were planted before the current range of environmental guidelines and protections were put in place, with trees planted right up to stream and roadside edges and require careful management.
- Forested catchments are now among the last places to find some of our most sensitive aquatic species such as freshwater pearl mussel.
- Much of our old woodlands have been lost and those with old woodland characteristics need to be restored.
- Diversification of our forests is also important, the most abundant tree on the Coillte estate is Sitka spruce and makes up 51% of our tree species.
- Planting the right tree in the right place with climate resilience in mind also remains a challenge.

Forests for Nature: Measuring Biodiversity

Bioclass 1: Outstanding

Bioclass 2: Excellent

Bioclass 3: Good

Bioclass 4: Moderate

Outside Biodiversity Area:
Protected Biodiversity features

Biodiversity features and natural values:



BioClass

BioClass is a Scoring System for habitats based on natural values and biodiversity features.

20% of Coillte's estate is managed for Biodiversity

Narration

So how do we manage biodiversity and nature.

Firstly, we measure it. Our biodiversity areas were originally selected for us by ecologists who recommended that 20% of our lands be managed for a given habitat or species protection.

We know that Biodiversity occurs right across our estate, so we also work carefully with nature in all our forests and lands.

This tree represents the entire Coillte estate with Biodiversity spread throughout our forest and lands but with the important areas of nature, the 20% biodiversity areas identified towards the top of the tree.

The biodiversity areas selected can vary widely in terms of their ecological value and management requirements. Some biodiversity areas are already habitats in good condition, while others show the potential to develop into valuable habitats over time.

In recent years, we have developed a new system for recording and mapping our biodiversity areas called BioClass. **BioClass is based on a review of the scientific literature on biodiversity in Irish forests and uses a series of natural values and biodiversity features to indicate the biodiversity value of the forest.** Based on the presence or absence of these natural values or features, a forest can be assigned to one of four BioClass ranks. These range from BioClass 1, the areas of highest ecological value, to BioClass 4, areas that currently have moderate value, or have low value at present, but with potential to develop into habitat of higher ecological value.

Forests for Nature: Measuring Biodiversity

Habitat Restoration Projects >5,500ha



LIFE Site
Derry, Co. Mayo



People's Millennium Forest
Ballygannon, Co. Wicklow



LIFE Site,
Attyslany, Co. Galway

Narration

BioClass allows us to develop site specific ecological management plans and we implement these through an annual programme of work we call BioForest.

Over the years we have restored some of the most ecologically valuable woodland and peatland habitats on our estate through our BioForest Programme.

Forests for Nature: Enhancing and Restoring Biodiversity



Narration

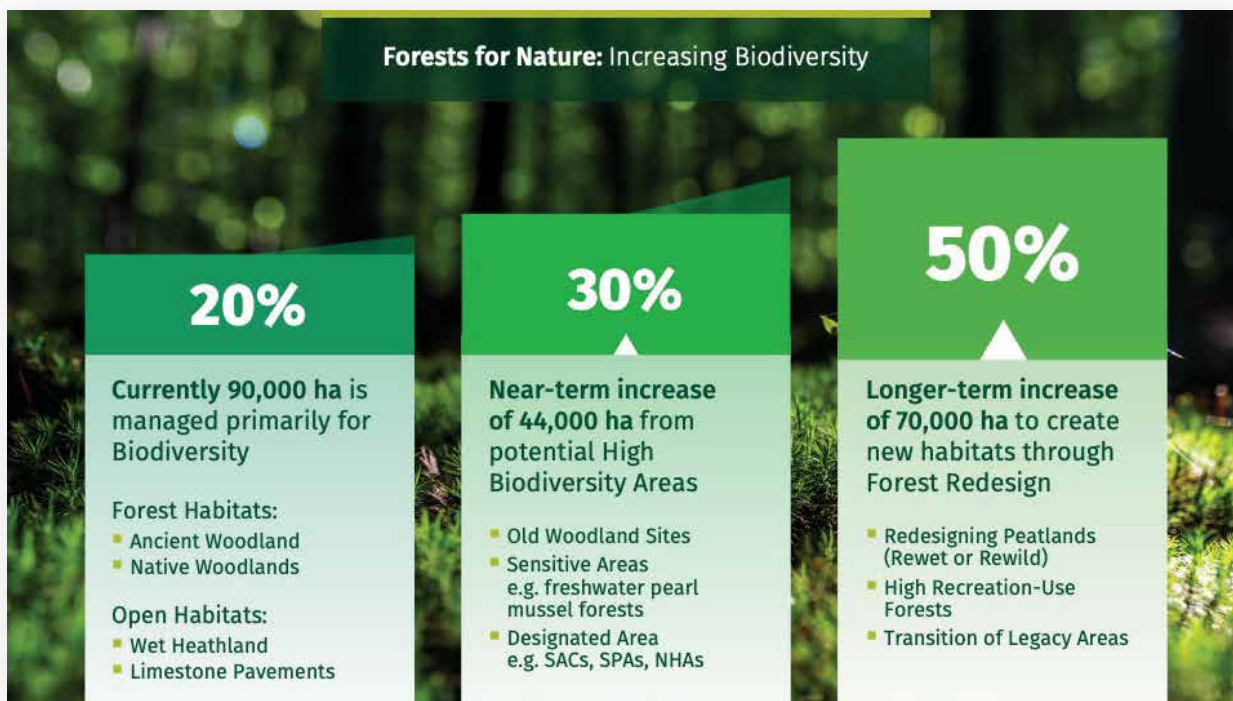
BioForest is our new approach to managing biodiversity in our forests and on our lands.

Connecting foresters and ecologists, and using different management approaches such as low impact silvicultural systems for these sensitive areas, BioForest is about using the right forest management tools in the right areas to benefit forest biodiversity.

Coillte's ecologists and foresters along with specially trained contractors work to implement forest management actions such as Continuous Cover Forestry, invasive species control and bog restoration in some of our top biodiversity areas.

In these examples you can see foresters and ecologists discussing a continuous forest cover management approach for Killinthomas woodland in county Kildare. This approach removes individual trees from the forest canopy, allowing space and light for natural regeneration of young trees to renew the forest while retaining a forest canopy.

Other larger scale nature restoration projects are ongoing at woodlands such as Hazelwood forest in county Sligo where the invasive species Rhododendron is being removed from the forest.



Narration

So, you can see that there is a lot of biodiversity restoration work underway. But we want to do more.

In the short term, by 2025, we are using our BioClass initiative to dedicate another 10% of our lands to be managed primarily for biodiversity, **bringing the overall total to 30% or over 130,000 hectares of forests and lands**. This makes it Ireland's largest biodiversity resource.

In the longer-term, there is an opportunity to redesign some of our forests to create new habitats and further restore biodiversity, so that **by the end of the century 50% of our estate is managed primarily for nature**.

In addition, we have an ambition to plant 100,000 hectares of new forests, half of which will be native Irish woodlands, creating more new habitats for biodiversity.

It is also important to understand that although these BioClass areas are managed 'primarily' for nature, there is still a great deal of biodiversity in the remaining parts of our forest estate; and although these areas may have a primary objective of recreation or wood production, Coillte works with and respects nature, protecting important habitats and features of biodiversity wherever they occur, such as watercourses, badger setts, heronries and hairy wood ant nests.

Forests for Nature: The Role of Coillte Nature



Narration

In addition to our BioClass and BioForest initiatives, we have established Coillte Nature, a not-for-profit unit within Coillte that is dedicated to the restoration, regeneration and rehabilitation of nature across Ireland. Its mission is to deliver real impact on the climate and biodiversity crises through large-scale projects based on the best ecological evidence.

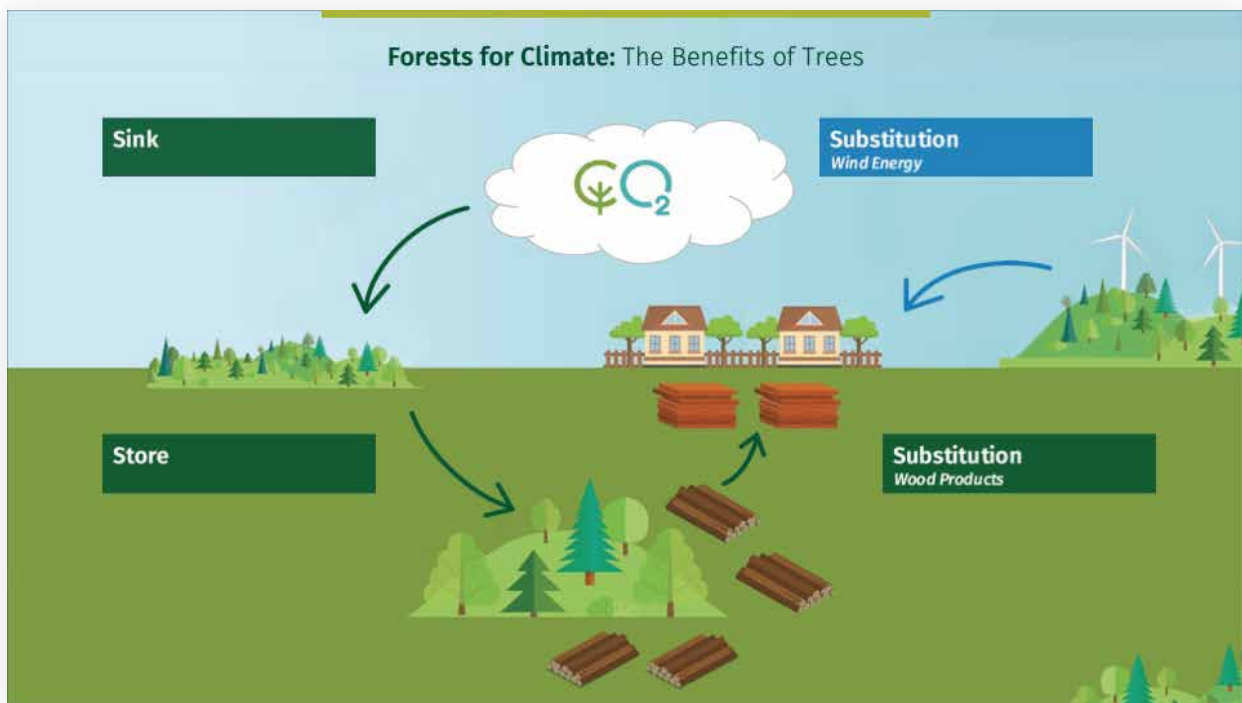
It is building on 30 years' experience in forestry, land management and habitat restoration to deliver real impact on the climate and biodiversity crises through innovative projects-of-scale across four strategic themes:

- **Afforesting** our landscapes by planting new native woodlands on un-forested land such as the midlands native woodland project.
- **Restoring** important biodiversity areas by investing in major habitat improvements such as the restoration of Hazelwood forest in county Sligo.
- **Regenerating** urban forests for the benefit of people and nature such as the Dublin Mountains makeover project managing these forests for nature and people.
- **Rehabilitating** ecosystem services by bringing sensitive or degraded lands into better health such as the wild western peatlands project exploring new ways to manage these legacy forests.



Narration

Coillte is fully committed to supporting the delivery of Ireland's Climate Action Plan and we have identified a range of climate-smart mitigation measures that can be applied across our forest estate.



Narration

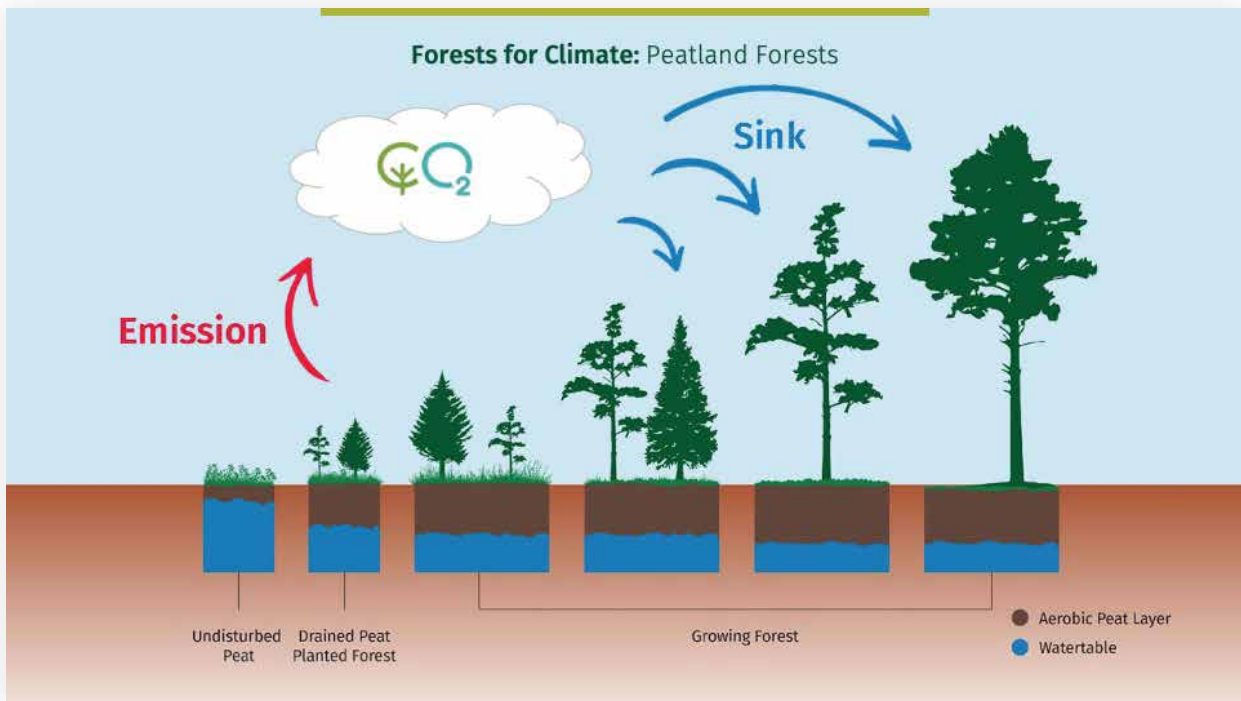
Forests are playing a key role helping to tackle Climate Change. The role of forests is best summarised as the **3 S's – Sink, Store, Substitute**.

- **Sink:** Forests remove carbon dioxide (CO₂) from the atmosphere as trees grow.
- **Store:** Forests store carbon in the woody biomass, forest soils, and wood products.
- **Substitute:** These Wood Products substitute the use of carbon intensive products, such as concrete and steel.

Our approach to “forests for climate” was to assess the estate for its potential to sink and store carbon in our forests and soils, and the potential to substitute carbon intensive products with sustainably grown Irish wood products.

Our ambition is to:

- Increase the Carbon Sink by creating 100,000 hectares of new forests.
- Increase the Carbon Store by lengthening rotations, managing broadleaves and redesigning some of our forests on Peatland Soils.
- Increase Carbon Substitution by providing sustainable timber and promoting the greater use of wood products.
- Enable the generation of an additional 1GW of renewable wind energy by 2030



Narration

Ireland's forests are a large store of carbon (c. 312 Mt carbon¹), and it is imperative that this store is protected, managed and increased in the long-term. An unmanaged forest estate would present a significant carbon emission risk in the long term due to biotic and abiotic factors, such as disease, storm damage and fire.

It is also essential to understand how we should better manage our peatland forests, planted in the last century largely for social and employment reasons. We do not create new forests in these areas today as we better understand the climate implications. Today a portion of these peatland forests present a carbon emission risk and this needs to be mitigated.

Forests for Climate: Peatland Forests



Rewet



Rewild



Replant

Narration

For these peatland forests we have identified three climate mitigation measures.

These three measures are based on the specific soil and forest stand characteristics unique to each forest, such as wetness, peat-depth, tree species, age and productivity.

These three approaches are:

- **Rewetting:** Removing trees and restoring the bog
- **Rewilding:** Regenerating the forests to form Semi-Natural Wilderness areas
- **Replanting:** Replanting with Productive Forests where the trees are providing a net carbon sink

Redesigning our forested peatlands through rewetting and rewilding will also potentially deliver biodiversity and ecological benefits to the forest as well.



Forests for Wood

Narration

Coillte is fully committed to provide a sustainable supply of certified timber to meet the increasing demand from society for renewable materials; and to support the increased use of Irish timber as a viable alternative to carbon intensive products, such as concrete and steel.

Forests for Wood: Provide Sustainable Irish Timber



Narration

The increased use of wood and wood-based products presents a great opportunity to tackle both the climate emergency and the need to decarbonise our built environment. The carbon benefits of building with wood are three times greater than conventional masonry builds.

Wood is a naturally renewable material that provides a wide range of products – from ‘construction timber’ that is used in the beams, joists and studs in the frames of our homes, to ‘pallets’ that are used to ship goods around the world, to ‘fencing and decking’ used in our farms and gardens; to ‘MDF’ that is used to make our furniture and kitchens.

There is also a great opportunity to create new innovative wood products, to support the construction of the 300,000 homes that we need in Ireland, and we are showcasing the examples of Irish timber-built structures in our newly redeveloped forest park at Avondale County Wicklow.

We need to use more wood in our society, and we need to make sure that this wood is produced in a sustainable and responsible way here in Ireland. This will mean that we will need to import less wood, which in turn means that we take the pressure of old-growth forests elsewhere in the world.



Narration

Coillte is the leading provider of outdoor recreation in Ireland, and has an open forest policy, welcoming visitors to our forests according to the seven principles of Leave No Trace.

Forests for Wood: Provide Sustainable Irish Timber



Narration

Coillte currently provide 250 recreational sites, 12 forest parks, 6 mountain bike trails centres and over 3,000km of walked marking trails for local communities.

The substantial rise in visitor numbers during the Covid-19 pandemic underlined the importance of our forests in providing access to the outdoors and supporting peoples' mental and physical wellbeing. Every year there are over 29 million visits to Irish forests.

We actively support the Woodlands for Health Initiative, which has demonstrated the direct benefits of forests on people's well-being and mental health.

Working together with our partners and local communities, We want to grow our existing recreation offering throughout the estate, increasing the number of recreational forests to 500 and enabling the development of world class destinations, also supporting the creation of new jobs, driving economic activity and sustaining local communities.



Narration

In summary, Coillte's vision is to deliver the multiple benefits of our forests to society, balancing our objectives so that our forests deliver for Climate, Nature, Wood and People.

- **For Climate:** we want to create new forests and redesign existing forests to improve the Carbon Sink and Store.
- **For Nature:** we want to increase the area managed primarily for nature and to improve their biodiversity value by carrying out programmes to enhance and restore these areas.
- **For Wood:** we want to provide a sustainable supply of certified Irish timber and promote the greater use of wood products.
- **For People:** we want to increase the recreational offering across the estate, with a particular emphasis on community based forests.

The four forest objectives are intrinsically linked, as are many of the potential benefits. Forests can deliver the multiple objectives of climate, nature, wood and people and have the capacity to provide a wide range of economic, environmental, and social benefits.

However, it is also important to acknowledge that maximising one objective has the potential to result in trade-offs with others. It may also not be realistic or appropriate to deliver all forest objectives equally in all forest locations. In addition, whilst there may be one primary objective, that is an objective which gets priority in a forest, it does not preclude the forest delivering on other additional objectives. Our approach has sought to balance forest objectives at the overall estate level.

Equally it must be noted that financial sustainability and an economically strong and sustainable wood and timber sector is essential in order for us to deliver the multiple benefits of our forests.

The **Right Objective** in The **Right Place** with The **Right Tree**

Narration

Working in this way we hope to have more forests than ever before, protect nature at scale and in the most sensitive locations. We hope to diversify our forest estate and redesign our legacy peatland forests.

Many challenges remain and must be addressed to move forwards. But getting the balance right means managing our forests differently, planting more trees in more places to deliver the many benefits of our forests.

We summarise this as the Right Objective in the Right Place with the Right Tree.

Thank You





Presentation to the
Citizen's Assembly
on Biodiversity Loss

15th October 2022




















Our **PURPOSE**

To manage the
state forests on
behalf of the
people of Ireland

Our **MISSION**

To deliver the
multiple benefits
of our forests to
society

Role of Forests: The Multiple Values of Forests

UN GOALS		FOREST VALUES		OBJECTIVES
 <p>3 GOOD HEALTH AND WELL-BEING</p>	Good Health & Wellbeing		Climate Change Mitigation	 <p><i>for climate</i></p>
 <p>6 CLEAN WATER AND SANITATION</p>	Clean Water & Sanitation		Water & Soil Protection	
 <p>7 AFFORDABLE AND CLEAN ENERGY</p>	Affordable & Clean Energy		Habitats for Nature & Wildlife	 <p><i>for nature</i></p>
 <p>8 DECENT WORK AND ECONOMIC GROWTH</p>	Work & Economic Growth		Sustainable Products	 <p><i>for wood</i></p>
 <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p>	Innovation & Infrastructure		Health & Wellbeing	
 <p>11 SUSTAINABLE CITIES AND COMMUNITIES</p>	Sustainable Construction		Rural Economy & Job Creation	 <p><i>for people</i></p>
 <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p>	Consumption & Production			
 <p>13 CLIMATE ACTION</p>	Climate Action			
 <p>15 LIFE ON LAND</p>	Life on Land			

Forests for Nature: Increasing Biodiversity

20%

Currently 90,000 ha is managed primarily for Biodiversity

Forest Habitats:

- Ancient Woodland
- Native Woodlands

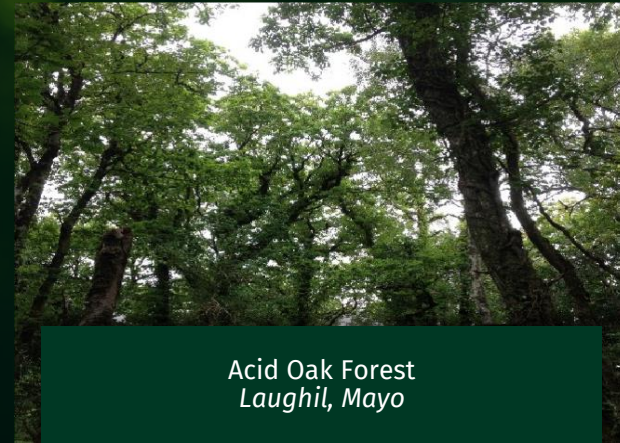
Open Habitats:

- Wet Heathland
- Limestone Pavements

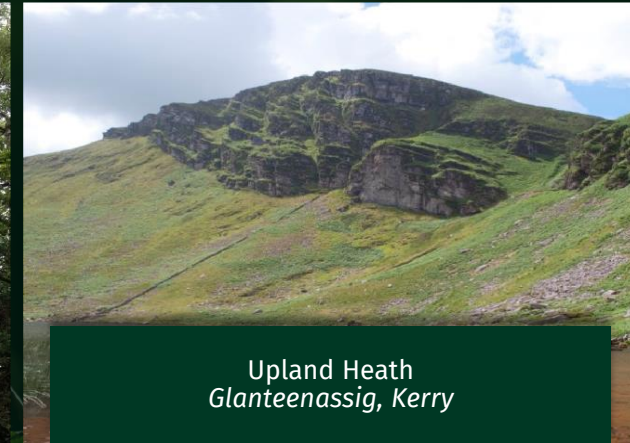
30%

Near-term increase of 44,000 ha from potential High Biodiversity Areas

- Old Woodland Sites
- Sensitive Areas
e.g. freshwater pearl mussel forests
- Designated Area
e.g. SACs, SPAs, NHAs



Acid Oak Forest
Laughil, Mayo



Upland Heath
Glanteenassig, Kerry



Veteran Beech
Portumna, Galway



Thinned Beech Forest
Knockbarron, Offaly



Blanket Bog
Pollagoona, Clare



Scots Pine Forest
Kilshane, Tipperary

Forests for Nature: Biodiversity Challenges

Loss of Old Woodlands



Invasive Species
Rhododendron Clearance



Forests in Water Sensitive Areas
Freshwater Pearl Mussel



Upland Forests in Designated Areas
Hen harrier



Legacy Forests on Peatlands



Wild Deer Management



Biodiversity Challenges

Forests for Nature: Increasing Biodiversity

20%

Existing Biodiversity

30%

Near-term Increase

50%

Longer-term increase of 70,000 ha to create new habitats through Forest Redesign

- Redesigning Peatlands (Rewet or Rewild)
- High Recreation-Use Forests
- Transition of Legacy Areas

Balancing Multiple Objectives

The Right Objective in the Right Place with the Right Trees

Forests for Climate



Create 100,000 ha of new forests, half of which will be native woodlands, that sink 18M tonnes CO₂ by 2050

Manage the existing Forest Estate to **increase the carbon store by 10M tonnes of CO₂ by 2050**



Redesign 30,000 ha of Peatland Forests for climate and ecological benefits by 2050



Generate 1 Gigawatt renewable Wind Energy to power 500,000 homes by 2030

Forests for Nature



Enhance and restore biodiversity by increasing the area managed primarily for Nature from 20% to 30% by 2025



Transform areas of our forests so that 50% of estate is managed primarily for Nature in the long-term

Forests for Wood



Produce 25 million cubic metres of certified Irish timber to support the construction of 300,000 homes by 2030



Promote the use and benefits of wood products to increase the level of timber homes from 20% to 80% by 2050

Forests for People



Enable the investment of €100 million in world-class Visitor Destinations to support growth in tourism and recreation by 2030



Double the number of Recreation Areas to 500, benefiting local communities and people's wellbeing



Create 1,200 new jobs in rural communities to support the just transition to a low carbon economy

Forests for Nature: The Role of Coillte Nature



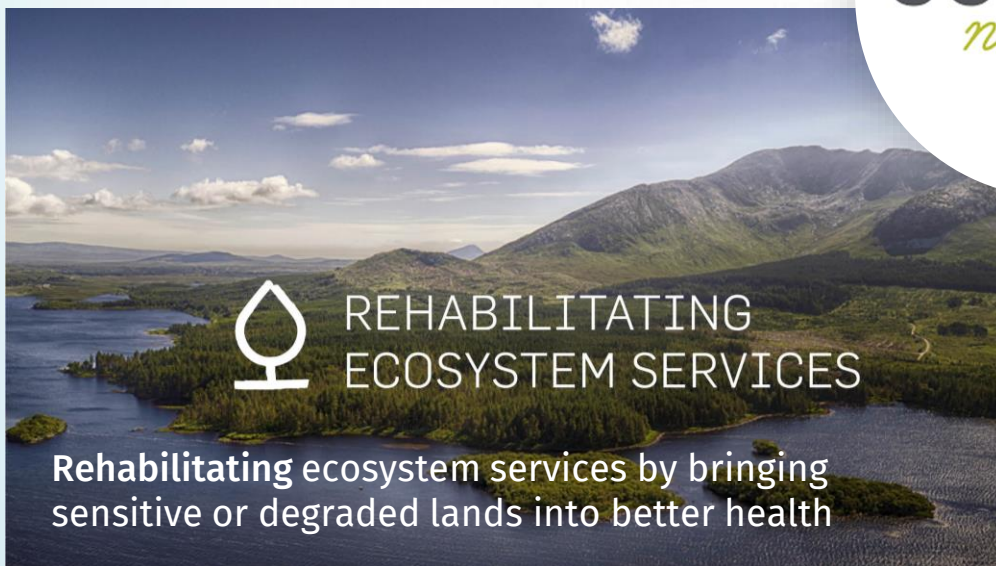
 RESTORING BIODIVERSITY


Restoring important biodiversity areas by investing in major habitat improvements



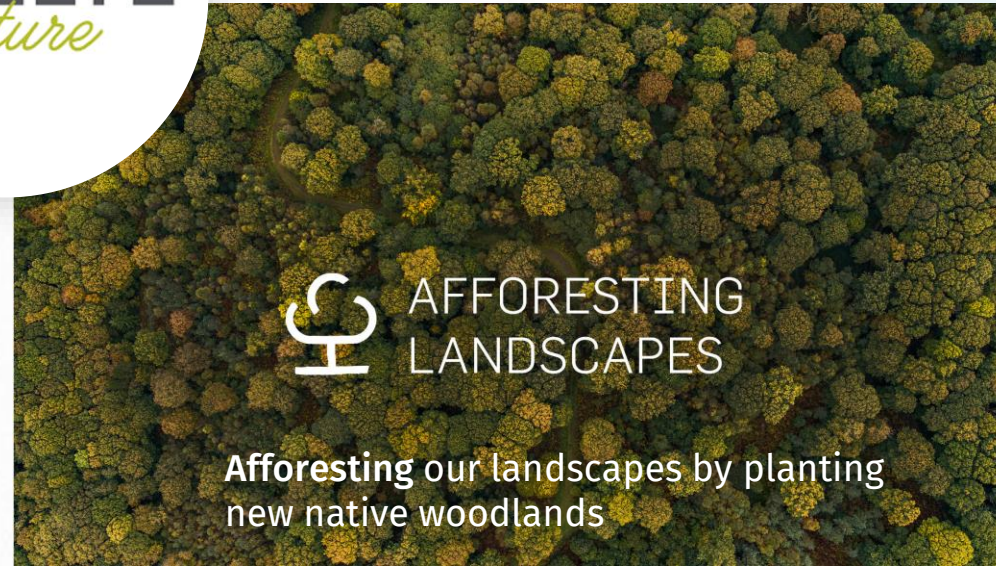
 REGENERATING URBAN FORESTS

Regenerating and creating new urban forests for the benefit of people and nature



 REHABILITATING ECOSYSTEM SERVICES

Rehabilitating ecosystem services by bringing sensitive or degraded lands into better health



 AFFORESTING LANDSCAPES

Afforesting our landscapes by planting new native woodlands



Thank You



Joint Committee on Environment and Climate Action
Examination of the Recommendations in the
Report of the Citizens' Assembly on Biodiversity Loss

Professor Áine Ryall
Centre for Law & the Environment
School of Law
University College Cork

Selected references on environmental courts by way of follow-up to questions at the Committee meeting on 17 October 2023:

Overview of developments as regards Environmental Courts internationally

[*Environmental Courts and Tribunals 2021: A Guide for Policymakers*](#) (United Nations Environment Programme, 2022)

Land and Environment Court of New South Wales

B Preston, 'The Many Facets of a Cutting-Edge Court: A Study of the Land and Environment Court of New South Wales' in E Fisher and B Preston (eds) *An Environmental Court in Action: Function, Doctrine and Process* (Hart / Bloomsbury, 2022)

Commentary on Environmental Courts in the Irish context

Á Ryall, 'A Framework for Exploring the Idea of an Environmental Court for Ireland' (2015) 22 *Irish Planning and Environmental Law Journal* 87

F Clarke, 'A Possible Environmental Court: the Constitutional and Legal Parameters' (2015) 22 *Irish Planning and Environmental Law Journal* 9

General observation:

The idea of specialist environmental courts often surfaces in the context of discussions around how best to promote and support effective and affordable access to justice in environmental matters. There is no doubt that specialisation can bring significant benefits, if the design and implementation of any new model is properly worked out and fits well within existing overall structures.

This is a complex area of law and policy. When examining developments in other jurisdictions, regard must be had to the specific legal, administrative and social context within which particular approaches to dealing with environmental disputes have evolved.

There are multiple dimensions to access to justice in environmental matters. It is important to adopt a systemic approach and to explore a wide range and mix of options. Working to avoid disputes arising in the first place, for example by improving the quality of planning and environmental decision-making, must be the starting point. This involves providing carefully designed legislation and ensuring that decision-makers have the necessary resources and expertise (legal, technical etc.) to deliver legally robust decisions. Informing the public about environmental rights, including rights of participation and challenge under the Aarhus Convention, is essential. There is an important public education aspect here.

Beyond those basic considerations it is necessary to tailor dispute resolution processes to the nature and complexity of particular disputes.

6 November 2023



Letter to the Joint Oireachtas Committee on Environment and Climate Action on the subject of Citizens Assembly on Biodiversity Loss, Recommendations on Rights of Nature.

For the attention of: Brian Leddin TD Cathaoirleach.

A Chairde,

I trust you are keeping well.

I am writing to you on behalf of [Galway County Public Participation Network](#)'s Environmental Linkage Group, the [Green Recovery Working Group](#).

We wish to share our concerns on the continuing environmental emergency, and to offer our full support to the Citizens Assembly recommendations which are currently before the Joint Oireachtas Committee. We are especially concerned with the recommendations to amend our constitution to include the Rights of Nature and the Human Right to a clean and healthy environment.

As a group, we strongly support the possibility of an amendment to the constitution, as we feel this would facilitate conversations up and down the Country, which could usher in the transformational change that we need. For too long we have considered nature to be an inert object from which we can continue to extract infinitely; now we urgently need to shift our mindset recognising nature's ability to provide all that we need (food, water, air) and understanding our role and responsibilities to protect the natural world. Public Participation Network's in every Local Authority are ideally positioned to deliver simple measures in every community that can have a big impact in achieving our climate goals with 1,265 community organisations in County Galway alone and almost 19,000 groups registered with PPN's Nationally. We believe a bottom-up approach is best.

This is a troubling time for humanity, we face many concurrent environmental challenges, indeed we are exceeding planetary boundaries and the safe operating space for humanity in many areas including for Biodiversity, Climate change and land system change. This cannot continue. Nature can be a big part of the solution to many of these problems, but we must first give Nature breathing space.

As a group we are aware of the negative condition of many of Ireland's habitats and species, and we know that existing laws and protections are not sufficient as they have failed to protect nature. We urge you the members of the Oireachtas Committee on Environment and Climate Action to be ambitious and accept the recommendations of the Citizens Assembly. We want a Rights of Nature approach; we want a referendum to take place on this urgent and important matter.

We trust you will deliver upon the Irish Citizens requests for urgent action and wish you well in your deliberations.

Yours sincerely,

On behalf of the Green Recovery Working Group of Galway County Public Participation Network.



Vincent Lyons, PPN Secretariat

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