



20<sup>th</sup> January 2023

To whom it may concern,

Natural Capital Ireland (NCI) welcomes the opportunity to respond to the Public Consultation on the new National Parks and Wildlife Service (NPWS) Draft Strategy Statement 2023-2025.

NCI is a not-for-profit organisation leading the national conversation on natural capital (view our website [here](#)). We are group of organisations and individuals from academia and public, private and NGO sectors. We are committed to the development and application of the natural capital approach to policy and decision making, which considers the value of the natural environment for people and the economy.

NCI's mission is to help build an Ireland in which biodiversity and ecosystem goods and services are valued, protected and restored.

Natural capital is an economic metaphor for nature; a concept that frames the world's resources like plants, animals, water, and minerals as assets or stocks that yield a flow of benefits to people. The Natural Capital Approach involves measuring and valuing natural capital assets and requires consideration of evidence across a very broad range of scientific disciplines. This approach helps to reveal the often hidden social and economic costs of environmental damage and the benefits related to the conservation and wise use of natural assets, and thereby provides critical information for a wide spectrum of national and local policies across all sectors in Ireland.

The aim of our response is to offer a framework which we believe will assist the NPWS in assessing more accurately, and more holistically, the benefits and costs of both individual aspects of the Draft Strategy Statement 2023-2025 and its overall impact on the organisation and its stakeholders.

The Draft Strategy Statement for the NPWS sets out the core mission and values of the NPWS for 2023-2025. NCI is responding to a number of specific questions set out in the Strategy Statement Public Consultation questionnaire.

[NCI response to the questionnaire below:](#)

### **Mission and Values**

**Question 1:** *Looking at page 3 of the consultation document, what do you think should be the core Mission of the National Parks and Wildlife Service?*

#### **Response:**

The National Parks and Wildlife Service has been the primary body responsible for the implementation of national, EU and global biodiversity policy. As recognised by the 2021 Strategic Review of the organisation, by Minister Malcolm Noonan in his response to the Review, and by independent reviews of the third National Biodiversity Action Plan, structural and broader political issues have limited the organisation's ability to arrest the loss of biodiversity, and to secure nature's contribution to people, including its multiple social, cultural and economic benefits. Whilst there are many intersecting

reasons behind this problem, NCI considers two issues to be of great significance in this context of this consultation: the failure of other government agencies to grasp the relevance of biodiversity and natural heritage to their own core missions and strategic planning, which has resulted in limited engagement across government on the issue; and a too-narrow focus on designated nature conservation sites and other protected areas, with insufficient attention and resources being devoted to the conservation of biodiversity in the wider countryside.

Therefore, NCI believes that the core mission of NPWS into the future should explicitly commit to:

- Driving a whole-of-government and whole-of-society approach to nature conservation and restoration in Ireland
- Promoting and explaining the multiple values of biodiversity and ecosystem services to all sectors of society, including cultural, social and economic values, including through use of ecosystem service-based approaches and the natural capital approach
- Restoring biodiversity and ecosystem services across all elements of the Irish landscape

**Question 2:** *Looking at page 3 of the consultation document, what core values do you think the NPWS should be guided by?*

**Response:**

Driving a whole-of-government, whole-of-society approach to the conservation, restoration and sustainable use of biodiversity in Ireland will require NPWS to identify and address the multiple barriers to communication and co-operation which have to this point hindered cross-sector engagement on biodiversity. It will also require that NPWS be viewed as a dependable and honest broker by all stakeholders, and be trusted to deal with issues in a fair, transparent and inclusive manner. This will require the creation of new collaborative frameworks that prioritise transparency in all processes, that are centred on evidence-based decision making, and demonstrate a commitment to inclusivity and diversity of thought.

**Recommendation:**

Therefore, NCI believes that the following values should guide NPWS into the future:

- Openness – both in terms of transparency in decision making, and showing an “open door” to all sectors or Irish society
- Inclusivity - engaging with all sectors and hearing all voices, including acknowledging and addressing the views and needs of minorities, marginalised and disadvantaged communities and other under privileged elements within society.
- Partnership - demonstrating a commitment to a spirit of partnership in order to overcome points of conflict and ensure successful engagement with all sectors, as well as engagement across the border with Northern Ireland and with our neighbours in the UK and across Europe.
- Commitment to evidence – ensuring that all stages of the policy process, and decisions on implementation, are based on sound science whilst also accounting for other forms of evidence including community knowledge, whilst also committing to making sure that the data behind decision-making is available to all stakeholders.

## Strategic Goals

**Question 3:** *Looking at page 4 of the consultation document, are these the right Strategic Goals and areas of focus for NPWS - is there anything missing?*

### Response:

The governance of biodiversity in Ireland cannot only lie with NPWS. This has been highlighted by the Stout-Ó Cinnéide (2021) strategic review, which calls for a “cross-Governmental policy approach to nature, climate and water” as “a key success factor in the evolution of the new NPWS”. Under several decisions adopted by the Conference of the Parties to the Convention on Biological Diversity (CBD), Ireland has committed to a whole-of-government, whole-of-society approach to biodiversity, which requires that each sector of government and society understands how their own development, strategic goals, and prosperity can impact and depend upon biodiversity and ecosystem services, and takes appropriate action to address the resulting risks and opportunities.

Whilst governance for biodiversity must be devolved, the new NPWS should play the lead role in bringing this holistic approach into effect, providing “hand holding” guidance to all state agencies and key stakeholders to enable them to see how they should act. The issue of climate change, and the interlinked implications which the climate and biodiversity emergencies pose for human well-being, represent important inflection points for this approach. The use of natural capital concepts, which can highlight the multiple values of biodiversity and ecosystem services, would be an important tool to facilitate this approach.

The natural capital approach would aid achievement of all strategic goals, in particular, to support nature-related decision-making at a national, region and community level.

### Recommendation:

- The new NPWS should make driving a whole-of-government, whole-of-society approach to the conservation, restoration and sustainable use of biodiversity one of its key strategic goals.
- The agency should also commit to a new approach that treats the interlinked issues of biodiversity loss and climate change as being interlinked in causes and solutions.
- Embed the natural capital approach in operational and policy-making decisions across the organisation and wider departments.

## Scientific Advice and Research

**Question 4:** *Looking at page 5 of the consultation document what are the biggest challenges that you think will face the NPWS in terms of Scientific Advice and Research Directorate over the next 3 years?*

### Response:

NCI believes that the headline function of “provision of scientific advice and evidence” is perhaps overly broad and rather vague. Unpacking this, and considering the many elements of governance which need to be addressed by the new NPWS, we see several major challenges which need to be recognised:

- The need to provide scientific advice based on a broad, cross-sectoral evidence base which accounts for systemic political, socio-economic, demographic, cultural and environmental drivers of biodiversity loss, as well as the multiple co-benefits of biodiversity conservation.
- Related to this, the need for guidance, supported by sector-relevant data, which addresses the specific impacts and dependencies of different social and economic sectors and which can

appropriately relate to and inform the strategic policy priorities of each government department and state agency.

- The need for scientific advice based on a system of ongoing ecological research and monitoring, with a prioritisation system which is transparent and adaptive, and which can respond rapidly to new evidence and changing conditions on the ground.
- The need to ensure that advice and guidance on biodiversity takes sufficient account of interactions with the causes and impacts of climate change.
- The need to ensure that the data related to each of the above points is open and accessible to all stakeholders.
- The incorporation of multiple forms of evidence outside of formal scientific research and data, including community environmental and ecological knowledge.

**Question 5:** *Do you have views on how these challenges can be met?*

**Response:**

Each of these challenges requires a transformation in how the advisory role of NPWS is framed, in how evidence is gathered and assessed, and in how it is employed and communicated. They also require a change in how the rest of government, the private sector and the wider public view and engage with the NPWS.

**Recommendations:**

- The new NPWS should view and communicate its advisory function in the context of a whole-of-government, whole-of-society approach to the biodiversity emergency. It should also be open to seeking advice - not just opinion – from across all sectors, as to how biodiversity relates to their respective strategic objectives, as well as to the distributive impacts of biodiversity policy on potentially vulnerable stakeholders.
- The agency should also explicitly frame its guidance, wherever relevant, as part of an integrated approach linked with climate change, to ensure that the vital role of biodiversity in climate mitigation and adaptation is addressed in research, policy and practice.
- The scientific research and advisory group within the new NPWS should include appropriate cross-sectoral expertise, with appropriate multi-disciplinary knowledge of how biodiversity relates to the policy objectives, goals and challenges of various social and economic sectors.
- Building on the work of the Citizens Assembly on Biodiversity Loss, NPWS should put in place a youth and citizen advisory group, to provide NPWS with perspectives on the success of its biodiversity leadership, conservation, education and communication functions from the wider public. This advisory group can assist with identifying and prioritising informal evidence from multiple sources, including citizen science and community knowledge.

NCI believes that the design, planning and implementation of these solutions can be greatly enhanced by adopting the natural capital approach, which can facilitate identification of the multi-sectoral dimensions of specific issues, and of the environmental costs and benefits of potential responses.

**Question 6:** *What 3-5 major objectives do you think the NPWS should set in terms of Scientific Advice and Research over the next 3 years?*

**Recommendation:**

NCI recommends that NPWS commits to the following objectives:

- Demonstrating an interdisciplinary and cross-sector approach which can better understand and communicate the biodiversity impacts and dependencies of different sectors and communities.
- Demonstrating an intersectional research approach which accounts for issues of distributive impacts of biodiversity policy as well as different perspectives from youth, minority, marginalised and least advantaged communities
- Initiating and sustaining an ongoing research programme on national conservation needs, founded on conservation biology and supported by increased resourcing of other specific and applied disciplines including taxonomy, ecotoxicology and natural capital approaches.
- Identifying and monitoring the root causes of biodiversity loss. The proximate causes (e.g. certain agricultural practices, water quality trends, land use change etc.) are generally well understood, however the specific and systemic root causes behind the proximate causes are almost entirely unassessed, unquantified and unaddressed in Ireland. (e.g. the role of socio-economic and demographic trends and of specific social policies; the role of specific elements of agricultural policy and specifically where and by what mechanics they impact ecosystem conditions; the specific areas of education policy which perpetuate poor consideration of biodiversity in key sectors, etc)
- Consistently addressing interactions between biodiversity and climate change in its advisory and research functions.

Again, NCI would advocate that the natural capital approach would be an invaluable tool in meeting each of these objectives.

### Nature Conservation

**Question 7:** *Looking at page 6 of the consultation document, what are the biggest challenges that you think will face the NPWS in terms of Nature Conservation over the next 3 years?*

**Response:**

Nature conservation in Ireland has typically focused on issues relating to designated nature conservation sites, national parks and meeting strict and often narrowly defined legal requirements, at the expense of addressing biodiversity conservation in the wider countryside. This raises several important challenges which NPWS must be ready to address:

- Lack of enforcement of legally binding legislation, and the need for stricter penalties
- Lack of adequate funding for landscape level conservation objectives, including for local community-led initiatives
- Lack of oversight due to lack of sufficient staff (e.g. rangers)
- Invasive species not being controlled/eradicated across the countryside and continuing to pose a threat to biodiversity
- Insufficient capacity for ongoing monitoring and maintenance of invasive species control
- The urgent need to change approaches to land use planning and development at local authority level to ensure land is appropriately zoned for nature conservation and restoration objectives, whilst also minimising conflicts with other sectoral plans and programmes

The new Conservation and Measures Unit and Conservation Planning Unit will play an important role in identifying areas in need conservation and restoration and funding implementation of conservation measures.

**Question 8:** *Do you have views on how these challenges can be met?*

NCI advocates that the natural capital approach should be a key tool for conserving and restoring our natural capital and ecosystem services, and for identifying appropriate nature-based solutions to landscape management issues that can address the needs and perspectives of multiple stakeholders.

As a holistic and inter-disciplinary toolkit, the natural capital approach can assist with silo-busting and greater integration of perspectives from multiple sources, and at landscape level It can also help to avoid, minimise and resolve conflict between stakeholders, schemes and strategies.

### Engagement and Corporate

**Question 19:** *Who do you think are the most important audiences for the work of the NPWS?*

**Response:**

In the context of a whole-of-government, whole-of-society approach to biodiversity, it is not overstating the case to say that all audiences are important for the work of NPWS. However, there are several sectors of the society and the economy which have traditionally not been involved in addressing biodiversity loss because they do not see it as an issue relevant to them. This particularly includes the financial, investment, trade, manufacturing, health, and social welfare sectors. These audiences require specific outreach and education approaches in order to ensure their positive involvement in addressing the biodiversity emergency.

In addition, a new approach is required to effectively address the role of the food sector – particularly agriculture, fisheries and food manufacturing – in contributing to biodiversity loss, and its significant potential to drive biodiversity conservation and restoration. This approach needs to be based on establishing stronger partnerships based on shared ground and common concerns – such as enhancing and sustaining nature’s contribution to people, and the interlinkages between nature and culture – in order to overcome the main points of (real or perceived) conflict between the food and environment sectors.

**Question 20:** *What do you think are the best ways for the NPWS to reach those audiences?*

**Recommendations:**

Reiterating our positions on the previous questions, NCI advocates for the development of strong cross-sector partnerships and direct engagement with the state agencies, the private sector, and the broader public, including open invitations for stakeholders and citizens more broadly to help shape NPWS strategies and to participate in delivering the required whole-of-government, whole-of-society approach to the biodiversity emergency.

All of our recommendations can be supported and strengthened by the use of natural capital approaches, which can not only help to identify critical ecosystems for conservation action, but those features and elements of our biodiversity and landscape which support social and economic security, prosperity and well-being.

## Major cross-cutting and strategic issues

**Question 21:** *What do you see as the most important strategic and cross-cutting issues for the NPWS over the next 3 years?*

It has been well-established that the loss of biodiversity is one of a range of intersecting issues which threatens human security and well-being at local, national, regional and global scales. These challenges – also including climate change, energy security, water, food and nutrition security, emerging diseases, disaster risks, and economic instability - are intimately interconnected in their causes, impacts and practical solutions. Several high-level international assessments – including the work of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, the UK’s Dasgupta Review (2021) and the 5<sup>th</sup> Global Biodiversity Outlook (2020) have highlighted how biodiversity loss sits at the centre of these challenges.

The draft text of the post-2020 Global Biodiversity Framework (adopted in Montreal in December 2022) also highlights how biodiversity, and the successful implementation of the GBF, is central to achieving each of the 17 global Sustainable Development Goals - none of the goals can be fully achieved if biodiversity loss is not halted and reversed.

These points highlight the importance of integrating biodiversity across all areas of government, and increasing engagement of all sectors of society. The key challenge will be to devise holistic, multi-dimensional, cross-sector and cross-community strategies and action plans which clearly signal that these challenges are interconnected, and which inspire and support all stakeholders to act in support of NPWS’ mission.

**Question 22:** *Do you have any other observations that you would like us to take into account when forming our Strategy for the next 3 years?*

### **Other observations:**

- With reference to the independent review on the NPWS (Stout & Ó Cinnéide, 2021), NCI endorses the recommendations, in particular, the need to invest in restoring and protecting our natural capital, which encompasses our biodiversity and ecosystem services. The use of integrating natural capital and values derived from ecosystem services into national economic accounts was highlighted as an important way to promote the message that nature delivers positive economic benefits. This is a key tool for implementing a strategy that delivers for the NPWS and its wider stakeholders.
- The Stout Ó Cinnéide (2021) report, noted that four similar bodies in Europe had a specific remit that included engagement with the public, encouraging sustainable use of protected areas and promoting outdoor recreation in nature, working with landowners on sustainable management through nature-based solutions and/or natural capital approaches. A similarly focussed specific remit for the NPWS should be part of its strategy going forward.
- Efforts to achieve the goal of enhancing nature’s contribution to people - under the new Global Biodiversity Framework, EU biodiversity strategies, and the draft of Ireland’s fourth National Biodiversity Action Plan - present a vital opportunity for NPWS to change and enhance its role in government and society, and to expand and improve its engagement and outreach activities.

We hope you find the points above offer opportunities to expand, deepen and co-ordinate policies across the whole range of economic, environmental, social and cultural values, and we would welcome the opportunity to work closely with the NPWS to deliver on the Draft Strategy Statement 2023-2025 over the coming years. Please contact us for clarifications, and further information at [researchteam@naturalcapitalireland.com](mailto:researchteam@naturalcapitalireland.com).

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