



Public consultation on the draft River Basin Management Plan for Ireland 2022-2027

Consultation Response Template

Note:

The purpose of this document is to help both the consultation response and evaluation process. The information provided by respondents will be used in order to shape the content and focus of the final River Basin Management Plan for the period 2022 - 2027.

Respondents are asked to follow the response template. However, it is not necessary to provide responses to all the questions. Respondents are also invited to supplement their responses with any relevant information, reports and/or analysis.

The public consultation process will run until 31 March 2022. Please provide your feedback as a word document (not PDF) by email to rbmp@housing.gov.ie by close of business on that date. Alternatively, you can send in your submission through the Department website (www.gov.ie/draftRBMP) where you can find the link to an online Survey.

Receipt of submissions will be acknowledged but it will not be possible to issue individual responses.



Section A: Respondent Profile (Optional)

Name	Natural Capital Ireland
Organisation	Natural Capital Ireland
Email Address	researchteam@naturalcapitalireland.com

Natural Capital Ireland (NCI) welcomes the opportunity to input into the Public Consultation on the draft River Basin Management Plan 2022-2027. NCI is a not-for-profit organisation leading the national conversation on natural capital (view our website [here](#)). We are a group of organisations and individuals from academia and public, private and NGO sectors interested in the development and application of the natural capital approach to environmental planning in Ireland.

Please select your gender *(Please place an X in the appropriate box)*

<input type="checkbox"/> Female	<input type="checkbox"/> Other
<input type="checkbox"/> Male	<input checked="" type="checkbox"/> Prefer not to say

Please select your age group *(based on your last birthday)*

<input type="checkbox"/> 12 or under	<input type="checkbox"/> 45 – 54
<input type="checkbox"/> 13 - 18	<input type="checkbox"/> 55 – 64
<input type="checkbox"/> 19 - 24	<input type="checkbox"/> 65 - 74
<input type="checkbox"/> 25 - 34	<input type="checkbox"/> 75 and over
<input type="checkbox"/> 35 - 44	<input checked="" type="checkbox"/> Prefer not to say

County of residence *(optional)*

Dublin

Sector *(Please place an X in the appropriate box)*

<input type="checkbox"/> Government Department	<input checked="" type="checkbox"/> Non Governmental Organisation
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<input type="checkbox"/>	Local Authority	<input type="checkbox"/>	Group Water
<input type="checkbox"/>	Other Public Sector Body	<input type="checkbox"/>	Individual
<input type="checkbox"/>	Other (<i>please specify</i>)	<input type="text"/>	

When seeking information in relation to water issues, which source(s) are you most likely consult? (*Please place an X in the relevant box or boxes*)

<input checked="" type="checkbox"/>	www.catchments.ie	<input checked="" type="checkbox"/>	Local Authority Waters Programme (<i>LAWPRO</i>)
<input checked="" type="checkbox"/>	EPA	<input checked="" type="checkbox"/>	An Fóram Uisce
<input type="checkbox"/>	Local Authority	<input type="checkbox"/>	NGO
<input checked="" type="checkbox"/>	Irish Water	<input type="checkbox"/>	Other (<i>please specify below</i>)
<input checked="" type="checkbox"/>	SWAN	<input type="text"/>	



Section B: Consultation Questions

Section 2.3 – What we want to achieve

Question 1: What are your views on the proposed themes and the key actions for delivering an increased level of ambition for the third river basin management plan?

There are a number of issues we would like to highlight in this section:

The *Increased Level of Ambition* is not considered a convincing theme. The *Protection of our Natural Capital* would be a more relevant theme, and would provide an opportunity to:

- Introduce the terms Natural Capital and Ecosystem Services
- Emphasise the urgency of protecting water quality and the biological processes that underpin the many benefits we derive, and depend on, from freshwater resources

Understanding these vital connections is key to bringing about behaviour changes by driving home the necessity of understanding and protecting our natural capital.

We do not see convincing evidence for *'a high level of ambition'*.

There is no clear timeline for the measures outlined. There is no sense of urgency around the issues of addressing declining water quality and associated losses of biodiversity and ecosystem services. The RBMP lists factors which will *'ultimately dictate the timeline over which measures can be delivered sustainably'*. Once such factor is finance, and although there is a suggestion of the development of a comprehensive finance strategy, there is no indication of when, or if, this will be delivered. The action states that the feasibility of establishing a group to develop a comprehensive financing strategy will be **explored**, but no clear indication of whether this will in fact be implemented.

There is a general low level of ambition in the statement that *'it is unlikely that all our objectives will be met by 2027' and 'it is likely that the implementation of measures and the time required for them to take effect will extend beyond the third-cycle. Therefore, the use of the exemption provisions under Article 4 of the Water Framework Directive for extended deadlines will be required'*.

Regarding Section 2.5, there is an absence of clear timelines. In this section, it is stated that *'Ensuring consistent policy integration between the RBMP process and other national and local plans is an ongoing issue and is one, which has been identified by external stakeholders as a priority'* appears to us to be very aspirational.

The report states *'we now have detailed estimates of the scale of mitigation measures required to significantly improve water quality and most importantly where those measures should be deployed'*. Why are these measures not being implemented? In our opinion, the RBMP also relies too heavily on working groups.



Section 3.3 – Artificial and Heavily Modified Water Bodies

Question 2: What are your initial impressions in terms of water quality when you hear a water body described as artificial or heavily modified?

The definitions of the terms '*artificial or heavily modified*' are adequate. A clear explanation of the term '*good ecological potential*' is required and to provide the guidance for determining '*good ecological potential*'. A *natural capital approach would be very helpful, assessing the costs and benefits of a range of ecosystem services.*

What are the criteria used for the designation of additional heavily modified water bodies? To what extent will finances dictate whether habitat restoration measures will be implemented and will the finances dictate the number of designations? Again, a natural capital assessment would generally show that the cost of failing to restore is actually much higher, across a range of values including financial ones, than the costs of restoration.

Section 3.4 – Impacts of Climate Change

Question 3: What are your views on the proposed measures outlined within the draft plan in relation to climate change?

Our views are as follows:

- The focus is largely on increasing resilience of water supply (Measure No. 16) to climate change with limited reference to the impacts on water quality and resilience in ecological functioning.
- Impacts of precipitation and flow changes and of unauthorized abstractions on high status waterbodies needs to be included and actions aligned with those in the Blue Dot programme.

The proposal to examine opportunities in the monitoring programme to improve understanding of climate change trends is welcomed (Measure No. 17).

We would suggest that the RBMP indicate the types of data collection being proposed. We suggest that Natural Capital Ireland's [INCASE](#) project, to be completed shortly, offers a good template for data collection in catchments.

Will the measures address the potential influence on changes in the distribution of flora and fauna on the functioning of freshwaters and overall aquatic biodiversity, and the impact of these changes on natural capital and ecosystem services?

Why is the establishment of long-term monitoring sites not included as a measure? This should be a priority in the RBMP.

Nature-based Solutions (NbS) are key to climate adaptation and are especially important in terms of water quality. They represent a prudent management of natural capital, utilizing existing natural resources and processes to restore ecosystems rather than expending natural capital in the building of technological solutions. Although NbS are mentioned in later parts of the draft RBMP, we believe they should also be included



Section 3.4 – Impacts of Climate Change

in this Section (3.4), not only in relation to green and blue infrastructure, but also in terms of our existing ecosystems, such as peatlands and river banks, where NbS could in many cases be implemented to restore, protect and conserve these important ecosystems.

Section 4 – Implementation of Second Cycle Plan

Question 4: What are your views on the progress achieved to date under the second-cycle River Basin Management Plan?

There was a number of welcome initiatives in the second RBMP:

- the expanded work programme and staffing of LAWPRO,
- the establishment of the Agricultural Sustainability and Advisory Support Programme
- the establishment of the [Blue Dot Programme](#).

The report on the 86 individual measures has not been made available, therefore we can't comment on progress achieved to date.

The Interim Assessment (end of 2020) of Expected Outcomes from the second RBMP (Table 10) is not very encouraging.

It is also stated on page 29 that there has been '*an overall 4.4% net decline in water quality which was mostly driven by a decline in the status of river water bodies*' between the first and second planning cycles. This is not an encouraging result.

Section 5.3.1 – Implementation / Governance

Question 5: What are your views on the actions included in the draft plan to improve the governance structures for the management of our waters?

Water is central to the activities of most sectors of the economy and its management is fragmented and too often not in line with the objectives of the WFD.

There are multiple bodies with responsibility for water:

- Their role needs to be more clearly defined
- A review of their effectiveness in the second planning cycle should be carried out

The natural capital approach offers an invaluable tool to integrate water management by using common metrics across the sector, taking account of the full range of costs and benefits of any specific policy or action, many of which are not picked up by conventional accounting and management.



Section 5.3.1 – Implementation / Governance

Agricultural policy and practices in particular continue to pose a significant risk to water quality (nutrients, pesticides, wetland drainage). This requires more serious consideration under Measure No. 23 and to be aligned with the objectives of the WFD. There will likely be further declines in water quality and losses of High Status sites if this is not achieved.

WFD risk assessment should be required for all intensive and derogation farms. There should be no further derogations until a proper licensing system is in place.

We welcome the proposal to have 46 local catchments plans as sub-plans to the national RBDP. Draft Catchment Management Plans should be published (and listed as a Measure) for public consultation. These should include:

- the findings of the LAWPRO catchment assessment work, including water quality and ecological status,
- the identified pressures and the proposed measures necessary to mitigate impacts.
- Again, we suggest that the NCI [INCASE](#) study will offer a good model for many of the issues that need to be addressed in catchment plans.

The frequency of reporting should be specified in Measure 25 on an enhanced programme of formal and scheduled progress reporting.

Section 5.3.2 – Areas for Action

Question 6: What are your views on the approach taken to the selection of areas for action in the draft plan?

The division of the Areas for Action into the three categories and associated responsible bodies is clear and highlights the role of stakeholders.

The approach taken seems reasonable and appears to be based on good coverage of the county. However, there are a few areas that need clarification:

- What percentage of the 4,842 waterbodies are covered in the 527 areas for action?
- Does this represent an increase on the numbers of waterbodies covered in the 2nd cycle?
- What criteria were used for selecting the Blue Dot waterbodies for inclusion in Appendix 3?

In relation to Blue Dot waterbodies, we believe that all water bodies should be included for protection or restoration:

- What is the reason for omitting some 'Not at Risk' Blue Dot waterbodies from the Areas for Action (only 45% included)?
- Why were all At Risk Blue dot waterbodies not included? Overall, only 62% of Blue Dot Catchments are included.



Section 5.3.2 – Areas for Action

Regarding headwater bodies:

- How many headwater bodies were included?
- What criteria were used to select these?
- Were any headwaters targeted for restoration in the lowlands?

Given the importance of headwaters for downstream water quality and catchment biodiversity it is imperative that they are targeted for assessment, restoration and protection measures.

What are the LA Areas for Restoration and Protection and how do they differ from the work of LAWPRO?

Section 5.3.2 – Areas for Action and Appendix 3

Question 7: What are your views on the list of proposed Areas for Action that is included in the draft plan?

A good geographic spread has been achieved. In order to be more informative this appendix should include:

- the waterbody codes within each Area for Action
- current status
- whether they were included in the 2nd cycle Priority Areas for Action.

Section 5.3.3 – Public Participation

Question 8: What are your views on the measures included to improve the level of public participation during the third plan?

The measures included to improve the level of public participation are overall well focused. We welcome the proposed action to explore opportunities for a national citizen science programme. Such a programme should:

- build on the pilot exercises underway, and
- develop a framework that encompasses the key elements for success and sustainability from governance to training and other resources, and
- targets not just awareness raising but fills spatial and temporal data gaps that can inform water quality and biodiversity monitoring and protection.

We believe that a high priority is data collection in first and second order streams (which is poorly represented in the national monitoring programme). Again, as NCI we point out that a natural capital approach is vital in revealing to the public the full range of costs and benefits of actions in the plan, thus helping citizens engage with its importance.



Section 5.4.1 - Agriculture and water quality management

Question 9: What are your views on the measures outlined in the draft plan to address the pressures from agriculture on water quality?

Overall, we do not get a sense of urgency or priority in addressing pollution from agricultural sources. In order to protect and restore water quality, six goals are set out in the RBMP (pg 57 and 58). Goal 6 sets a minimum target of 2,500km of riverside interception measures. This cumulative length represents only 3% of all river channels. Will 50% reduction in nitrogen losses achieve the water quality and other benefits?

A rigorous natural capital approach will show that the apparent benefits of particular agricultural policies and practices are often far outweighed by their negative consequences, a negative balance that is frequently invisible to (or even hidden by) policy makers focused exclusively on short term conventional financial accounting.

Section 5.4.2 - Natural Rivers and Lakes and River Restoration – Hydromorphology

Question 10: What are your views on the development of a new Controlled Activities for the Protection of Waters regime to address pressures on the physical condition of waters?

We welcome the recognition of hydromorphological pressures and the need to address them.

The proposed *Controlled Activities regime* will give recognition to the multiple ways in which the physical habitat/flow regime of a river may be impacted with consequences for ecological quality and potential.

We believe that there is a need to prohibit further wetland drainage and to aim for a wider national wetland restoration strategy and programme of measures. Using a natural capital approach would help reveal, to stakeholders and the general public, that the benefits of draining wetlands are usually far outweighed by their costs. The NC approach demonstrates, in very specific ways, that draining a wetland often brings costs in terms of increased flooding and property damage in the area, in terms of increased carbon emissions and lost carbon sequestration, in terms of biodiversity loss, and in terms of recreational and aesthetic degradation, with associated mental and physical health costs to the whole community. The benefits of drainage, in contrast, are often short term, and may only accrue to the owner of the land in question, or to a small interest group.

Question 11: What are your views on the establishment of a restoration programme to mitigate the negative impact of past construction in or near water bodies?

We welcome the establishment of a restoration programme, however, the costs and benefits of such a programme need to be stated clearly. A natural capital approach will demonstrate these costs and benefits very clearly. Apart from the pilot project on Annacotty Weir, Co. Limerick, what are the criteria for selection of other restoration projects? An inventory of the natural capital restored in such projects would be a very



Section 5.4.2 - Natural Rivers and Lakes and River Restoration – Hydromorphology

helpful benchmark. Has a list of areas for action been compiled and will this be available for public consultation?

Section 5.4.3 – Forestry

Question 12: What are your views on the issue of forestry and the proposed measures outlined within the draft plan?

- We welcome the increased focus on ecological implications of inputs from forest activities and the engagement of ecological expertise.
- The [Woodland for Water scheme](#) has the potential to protect water resources and provide biodiversity benefits if appropriately targeted and of a scale sufficient to intercept nutrients and sediment. Again, natural capital accounting would demonstrate the benefits of such protection transparently.
- The requirement for replanting should be removed for acid sensitive headwater catchments with peaty soils, and particularly for those at high status.
- Protection of high status headwaters and pearl mussel sites should be included as a measure.
- No further afforestation of acid sensitive areas with peat soils should be permitted. All afforestation projects should include a WFD specific assessment that addresses potential risk to hydrochemistry, ecology and hydromorphology, using a natural capital approach.
- A measure relating to enforcement needs to be added together with monitoring to determine the effectiveness of measures, if benefits are to be maximised.

Section 5.4.4 - Urban Waste Water

Question 13: What do you think should be the main focus of work during Irish Water's next investment period (2025-2029)

We do not see evidence of a *high level of ambition*. Measure No. 60 refers to the delivery of a multi-annual investment programme to provide waste water infrastructure for unsewered villages. How many sites are to be targeted in each year and will all be addressed by 2027? It is totally unacceptable to have raw or inadequately sewage discharged to surface waters in a developed country and is certainly not compliant with the objectives of the WFD or UN Sustainable Development Goal 6. If we really valued natural capital and ecosystem services, and built those values into our water policy, such practices would be revealed as significant losses to our national wealth.



Section 5.4.5 - Urban Runoff Pressures

Question 14: What are your views on the issue of urban runoff pressures and the proposed measures outlined within the draft plan?

No response.

Section 5.4.6 - Domestic Waste Water Discharges

Question 15: What do you think are the main barriers to people accessing the grants available to upgrade domestic waste water treatment systems?

We would suggest that some support could target the systems that failed inspections between 2017-2018.

Section 5.4.7 - Unknown Pressures

Question 16: How can local communities help with the identification of significant pressures on water bodies with unknown pressures?

We see a role for citizen science that aligns with measures to improve public participation. Engagement with LAs is important in a national citizen science programme. EIP, LIFE and other community projects also help in this regard. There is also an opportunity for LAs to engage with third level institutes to initiate projects and/or work experience for Master's students to help with the identification of the pollution sources and pathways, or hydromorphological issues, and measure their impacts using a natural capital approach.

Section 5.4.8 - Other Pressures

Question 17: What are your views on the issue of other pressures and the proposed measures outlined within the draft plan?

No response



Section 5.4.9 – Peat

Question 18: What are your views on the proposed measures outlined within the draft plan to address the impacts of peat on water quality?

There are a wide range of projects underway that should improve the knowledge base and guidance on peatland restoration, including a much more precise assessment of green house gas budgets.

The key challenge relates to the financial options to sustain and escalate restoration efforts. But a natural capital approach would reveal that the cost of failing to restore is always much higher than the cost of restoration, which is often minimal, especially when nature-based solutions are available. In any case, we need to greatly increase investment in green infrastructure, which is often self-sustaining once restored or developed. Our reluctance to do so contrasts with our often unthinking willingness to invest in built infrastructure (hard engineering solutions), despite the high and ongoing expenditure in natural capital that such infrastructure requires.

See our response to Section 5.5 (Update and Review of the Economic Analysis).

Section 5.4.10 - Industry, Mines and Quarries

Question 19: What are your views on industry, mines and quarries and the proposed measures outlined within the draft plan to address their impact on water quality?

No response

Section 5.4.11 - Drinking Water Source Protection

Question 20: What needs to be considered when making recommendations on the new approach to drinking water source protection as part of the transposition of the recast Drinking Water Directive?

No response



Section 5.4.12 - Invasive Alien Species

Question 21: What are your views on the measures proposed for tackle the issue of invasive alien species?

We believe that the measure to focus on the target priority species is well justified. However, a measure to initiate early detection of invasive species is necessary. The cost of early detection measures is far outweighed by the benefits of protecting our natural capital, in terms of both biodiversity and ecosystem health and functions.

Section 5.4.13 - Hazardous Chemicals in the Aquatic Environment

Question 22: What are your views on the issue of hazardous chemicals and the measures outlined within the draft plan?

No response

Section 5.4.14 – Aquaculture

Question 23: What opportunities would you suggest to strengthen the links between the Aquaculture licensing process and the objectives of the Water Framework Directive?

No response

Question 24: What are your views on the process identified to implement a new legislative and management framework for shellfish waters in Ireland?

No response

Section 5.4.15 - Land Use Planning

Question 25: What are your views on the measures proposed in the draft plan to address issues relating to land use planning?

We welcome the provision of guidelines and tools to aid planning decision. However, this should include a natural capital accounting /ecosystem services assessment approach as mentioned in Section 5.5 of this document.

Natural capital approaches and natural capital accounting specifically presents a means to support land use planning with a much wider range of analysis/data than that offered by conventional approaches, because it builds in the fullest possible range of environmental – and cultural – costs and benefits of any given land use policy. It is also valuable because it can be used continuously to support and monitor the maintenance of ongoing land use planning and processes.



Section 5.4.15 - Land Use Planning

Measure No. 104 (Appendix 2) has an action to ‘*Progress amendments to the planning and development legislation to give effect to the new guidance*’ – what is the timeline for this?

We are concerned about the reference to exemptions in the proposed amendment to the planning process, in particular, if there is a conflict between WFD goals and some sustainable developments - ‘*This legislation will also enable the identification and management of developments where exemptions from adherence to the Water Framework Directive may be necessary in the case of proposed sustainable development*’. The protection of water quality is a key element of all sustainable development and is in line with UN Sustainable Development Goal 6. The natural capital approach, properly implemented, reveals the fallacy underlying these assumptions.

Section 5.5 – Update and Review of the Economic Analysis

Question 26: What are your views on the economic analysis proposed and the measures outlined under this section?

We believe that the natural capital approach and natural capital accounting are key measures that should be incorporated into the RBPM, particularly in relation to the economic analysis.

We believe that the natural capital approach makes visible values (both benefits and costs) that are obscured or invisible in conventional evaluations of the economic and environmental impacts of policies across the whole range of human activity. We therefore propose this approach be embedded in the RBMP. This approach can reveal values and relationships within the RBMP that would otherwise remain opaque.

The topic of natural capital is growing in importance at the European level and nationally:

- In late 2019, the European Green Deal was announced, which states that “*all EU policies should contribute to preserving and restoring Europe’s natural capital*”. In June 2020, the EU published its new Biodiversity Strategy, which states that by 2050, “*the EU’s natural capital will be protected, valued and appropriately restored*”. Further, the Biodiversity Strategy sets a target to bring at least 10% of agricultural land under management for biodiversity.
- The economic benefits delivered by natural capital remain very undervalued and underrepresented in government policy. Properly accounting for natural capital can help make these values visible, revealing both Ireland’s hidden wealth which enriches us, and the hitherto invisible factors that, by degrading natural capital, impoverish us. Natural capital concepts are already found in a range of flagship national policies, including the National Planning Framework, the National Biodiversity Action Plan 2017-2021, the National Adaptation Framework, and Heritage Ireland 2030 – but much more can be done to embed natural capital



Section 5.5 – Update and Review of the Economic Analysis

thinking in decision making. The 4th National Biodiversity Action Plan 2022-2026 is currently being drafted and it is anticipated that the natural capital approach and natural capital accounting will be incorporated into the Plan, in line with EU-wide adoption of the UN System of Environmental Economic Accounting ([SEEA](#)) (information on the SEEA in the next section), and proposed changes to the EU Regulation on Environmental Economic Accounts. As part of natural capital accounting, Ecosystem Accounting ([SEEA-EA](#)) aims to reorient policies to deliver sustainable development and improved human well-being by measuring and valuing the extent, condition and services of Irish ecosystems as part of the System of National Accounts under the Central Statistics Office's [Irish ecosystem accounting](#).

- The recent World Economic Forum's Global Risks Report (2022), states that the top three most severe global risks are climate inaction, extreme weather, and biodiversity loss; all of which are inter-related risks that compound each other. These risks are a direct threat to our natural capital, and also stem largely from our failure to conserve and restore it.

In order to protect, restore and enhance our natural capital, we must first understand the extent and condition of existing natural assets. In other words, we must establish a baseline upon which targets for improvement can be set.

NCI is a partner on the pioneering EPA-funded [INCASE project](#), which is the first project to apply Natural Capital Accounting principles to catchments in Ireland. Natural Capital Accounting reports across four main sets of ecosystem accounts – extent, condition, services and benefits - and presents a standardised platform to collate information and regularly report on progress in relation to climate actions, biodiversity conservation and restoration, protection of waterbodies, and general good environmental practices (as identified in cross-sectoral areas such as agriculture, energy, environment, forestry, nature, marine, planning and water supply/use policies).

The [INCASE project](#) is piloting this natural capital accounting approach in four river catchments across Ireland. The prevailing natural capital accounting approach at country level is the System of Environmental Economic Accounting ([SEEA](#)), which has been adopted by the UN and is in use by about 90 countries worldwide. The SEEA is a guide to integrating economic, environmental and social data into a single, coherent framework for holistic decision-making. There is a range of articles, blogs and supporting videos available from the INCASE website [here](#). Evidence supporting the approach has been gathered through the [INCASE](#) project and four articles published that are relevant to the draft RBMP public consultation in terms of the natural capital approach and natural capital accounting are listed below:

- 1.1. Farrell C, Aronson J, Daily G, Hein L, Obst C, Woodworth P, Stout J (2021) Natural capital approaches: shifting the UN Decade on Ecosystem Restoration from aspiration to reality. *Restoration Ecology* <https://doi.org/10.1111/rec.13613> (accessed 24th March 2022).



Section 5.5 – Update and Review of the Economic Analysis

This article highlights a number of initiatives globally that are applying natural capital approaches for national accounting, land use, business support and health and wellbeing.

- 1.2. Farrell CA, Coleman L, Kelly-Quinn M, Obst CG, Eigenraam M, Norton D, O'Donoghue C, Kinsella S, Delargy O, Stout JC (2021) Applying the System of Environmental Economic Accounting-Ecosystem Accounting (SEEA-EA) framework at catchment scale to develop ecosystem extent and condition accounts. *One Ecosystem* 6: e65582. <https://doi.org/10.3897/oneeco.6.e65582> (accessed 24th March 2022).

This article outlines the approach to gathering data to develop extent (developing an asset register) and ecosystem condition accounts at catchment scale.

- 1.3. Farrell CA, Coleman L, Norton D, Kelly-Quinn M, Obst C, Eigenraam M, O'Donoghue C, Kinsella S, Smith F, Sheehy I, Stout JC (2021) Developing peatland ecosystem accounts to guide targets for restoration. *One Ecosystem* 6: e76838. <https://doi.org/10.3897/oneeco.6.e76838> (accessed 24th March 2022).

This article outlines the approach to developing peatland extent and condition accounts at catchment scale to prioritise areas for restoration.

- 1.4. Farrell CA, Stout JC (2020) Irish Natural Capital Accounting for Sustainable Environments: Stage 1 Feasibility Report. www.incaseproject.com URL: <https://www.epa.ie/publications/research/biodiversity/research-322.php> (accessed 24th March 2022).

This report presents a good overview of the UN System of Environmental Economic Accounting Ecosystem Accounting and potential applications in the Irish context.

We encourage engagement with the Ecosystem Accounts Division of the Central Statistics Office in order to contribute to the task of developing such [Irish ecosystem accounts](#) as part of the RBMP 2022-2027.

Any further comments?

People may also supplement their responses by attaching any relevant information, reports and/or analysis.

NCI's vision is for an Ireland in which natural capital and ecosystem goods and services are valued, protected and restored. Our mission is to help to value, protect and restore Ireland's natural capital and ecosystem services. We do this by supporting the adoption of natural capital concepts in public policy and corporate strategy, promoting informed public and private sector decision-making and assisting in the establishment of a national natural capital accounting standard as required by the EU.

Natural capital approaches, and natural capital accounting specifically, present a means to support policy and decision-making with a much wider range of analysis/data than that



Any further comments?

People may also supplement their responses by attaching any relevant information, reports and/or analysis.

offered by conventional approaches, because it builds in the fullest possible range of environmental – and cultural – costs and benefits in the assessment of any policy. It is also valuable because it can be used continuously to monitor the full cost-benefit performance of any policy into the future.

Implementation of the natural capital approach will be useful towards delivering on the aims of the RBMP of achieving good water quality in our rivers, lakes, estuaries; which is essential for protecting Ireland's drinking water sources, environment and people's quality of life.

We hope you find our response regarding the natural capital approach offers opportunities to expand the RBMP across the whole range of economic, environmental, social and cultural values. We would welcome the opportunity to work closely with the Department in developing a management plan with the natural capital approach embedded in it. Please contact us for clarifications, and further information at researchteam@naturalcapitalireland.com.

Section C: Submission discretion

Submission confidentiality

We will treat your information in line with data protection laws and policies when we are analysing and publishing the results of this consultation. Overall results that are given by individuals will be anonymous, that is, it will not be possible for you to be identified in the final report.

All submissions and comments submitted to the Department for this purpose are subject to release under the Freedom of Information (FOI) Act 2014 and the European Communities (Access to Information on the Environment) Regulations 2007- 2014. Submissions are also subject to Data Protection legislation.

Personal, confidential or commercially sensitive information should not be included in your submission and it will be presumed that all information contained in your submission is releasable under the Freedom of Information Act 2014.