

1 Improve governance and stewardship of biodiversity

1.1 Improve policy coordination

1.2 Mainstream biodiversity into decision-making across all sectors

1.3 Ensure accountability for the next National Biodiversity Action Plan and set SMART (Specific, Measurable, Achievable, Realistic & Timely) targets



1.1 Improve policy coordination

The need for coordinated national environmental policy is clear: the latest [State of Ireland's Environment report](#) from the EPA called for “a single overarching policy position – a vision to protect Ireland’s environment into the future”. The listing of the UN Sustainable Development Goals against the seven National Biodiversity Action Plan (NBAP) objectives is a good example of this type of coordinated policy as it facilitated comparison, but more needs to be done to ensure policy conflicts are minimised.

The taxpayer is not getting value for money on biodiversity policy due to a chronic lack of coordination – and sometimes outright conflict – between the NBAP and other national policies. At a minimum, all departments must ensure their policies are consistent with and/or, promote the aims of the NBAP.

National tourism and food policies trade on Ireland’s ‘green’ image, which is not borne out by the evidence. Plans such as [Food Wise 2025](#) and [Harnessing Our Ocean Wealth – An Integrated Marine Plan for Ireland](#) focus on economic growth rather than sustainable management of these environmental systems and areas. There is significant reputational risk in the continued marketing of Ireland and Irish products as ‘green’ given the state of biodiversity in this country. Many economic sectors will be undermined if this situation continues.

Farm payments are a good example of the lack of coordination in environmental policy. Certain landscape features and semi-natural areas are currently ineligible for farm payments but some of these areas are [Natura 2000](#) sites and therefore extremely important for biodiversity. Farmers should be rewarded for managing these areas. Furthermore, semi-natural habitats on farmland (currently considered “unproductive” areas) should be eligible for payments.

The Government must also significantly improve training of agricultural advisors and farmers to recognise and maintain biodiversity on farmland. There are some positive results-based agri-environment projects, like the [EIPs](#), but these are small in scale and need to be scaled up and rolled out nationwide for enhanced impact.

Biodiversity considerations are not adequately integrated into land and marine spatial planning: there is currently no link between the [National Planning Framework](#) and the forthcoming National Land Use Plan.

Furthermore, commercial semi-states such as Coillte and Bord na Móna still have economic dividend obligations. The Government should mandate non-economic biodiversity dividends which enable greater public health and wellbeing benefits, carbon sequestration and flood mitigation as well as biodiversity benefits from public lands, for example through a strong biodiversity duty for semi-states.



1.2 Mainstream biodiversity into decision-making across all sectors

The first objective of the current NBAP is to mainstream biodiversity into decision-making across all sectors. There have been some wins on this objective. For example, dedicated biodiversity funding for Local Authorities has been transformative in raising the profile of the issue and catalysing action. Having a local Heritage or Biodiversity Officer has allowed for the monitoring and implementation of Local Biodiversity Action Plans and liaison with community groups. Further investment is required to ensure these Officers have the appropriate ecological skills and sufficient resources to make a difference to local biodiversity.

Furthermore, the [National Farm Survey](#) is beginning to incorporate habitat assessments. This is a pilot, but has huge potential to engage farmers, landowners, foresters if appropriately designed.

Overall, however, it is clear that mainstreaming is wholly insufficient for the scale of the challenge. The Biodiversity Working Group comprises Departments, Agencies and other bodies that have a role in implementing the Plan. But the policies of these organisations do not consistently mainstream biodiversity and fail to align with the aims of international policies such as the [EU Green Deal](#), [EU Biodiversity Strategy](#), [SDGs](#), [NFRD](#), [EU Sustainable Finance Action Plan](#), [UN Decade of Restoration](#) and others. European funds such as [EMFF](#), [CFP](#), & [CAP](#) do not currently deliver meaningful positive outcomes for biodiversity and with some €500 million per annum likely to be spent in the coming years between the next CAP Pillar 1 eco-scheme payments and Ireland's commitments to agri-environment schemes under Pillar 2, there is huge potential for meaningful change.

Elsewhere, Ireland lags behind its neighbours in incorporating biodiversity into the planning process. Investment in Biodiversity Officers across all local planning authorities is vital, and the Government must consider requiring plans and projects to achieve Biodiversity Net Gain, not just No Net Loss. There is no metric for this in Ireland, while in the UK, [Defra](#) and [Natural England](#) have developed and are continuing to develop metrics for this.

The Government can use the SDGs and the Climate Action Units established in some departments as frameworks for mainstreaming biodiversity across policy and beyond. For example, carbon budgets can hold government departments and sectors to account, and set up strong expectations and targets. This should be complemented by establishing a cross-party working group on biodiversity.

Internationally, Ireland must demonstrate its high-level commitment to biodiversity by ensuring there is ministerial representation at the [UN Convention on Biological Diversity](#) in 2021. There is also an opportunity for Ireland to use its UN Security Council seat to advocate for biodiversity action on the global stage.



1.3 Ensure accountability for the next National Biodiversity Action Plan and set SMART targets

It is positive that National Parks & Wildlife Service ([NPWS](#)) conducted an [Interim Review](#) of progress on the current National Biodiversity Action Plan (NBAP) and made the review publicly available on its website. Of the 119 actions identified in the NBAP, the Interim Review states that 8 are implemented, 98 are ongoing and, for 13, there has been limited progress. However, a detailed review of progress on the current NBAP cannot be completed, as the Plan does not provide baselines or SMART (Specific, Measurable, Achievable, Realistic, Timely) targets.

It is clear that the most recent Plan, together with preceding plans, has not succeeded in halting or reversing the negative biodiversity trends in Ireland, with 85% of EU protected habitats in unfavourable status and 46% demonstrating ongoing declines. This suggests that the list of 119 actions have not sufficiently focused on on-the-ground impacts for biodiversity. The current NBAP lacks urgency: emergency coordination is required in the face of a biodiversity crisis which could have catastrophic costs for our economy and society.

Accountability for the delivery of the NBAP is essential. The Government should place the NBAP on a legal footing to ensure accountability for its delivery, as is being considered for the Climate Action Plan.

The [Programme for Government 2020](#) committed to “review the remit, status and funding of the NPWS to ensure that it is playing an effective role in delivering its overall mandate and enforcement role in protection of wildlife”. The Minister and Department with primary responsibility for the NBAP must be strengthened, adequately resourced and enabled to act across government departments.

There is an overreliance on volunteer labour for oversight of the implementation of the National Biodiversity Action Plan. The National Biodiversity Forum (NBF) members that have prepared this report are all volunteers who undertake a significant workload, with insufficient resources for organising meetings and commissioning reports. The Government should establish a secretariat for the Forum, provide resources for workshops and agree a timetable of meetings with the minister, so that the NBF can undertake more comprehensive oversight and make more detailed recommendations. The provision of funds for two recent workshops ([CAP4Nature](#) & this commentary) demonstrates that with proper resourcing, the Forum can produce useful contributions.

Finally, the next NBAP must establish SMART targets and Key Performance Indicators that will measure positive impacts on biodiversity. Targets should be focused on measurable results-based outcomes and actions with a strong evidence-base for effectiveness.
