

CONSULTATION

Response Document



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Review of

Draft 3rd National Biodiversity Action Plan

20 January 2017

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), being the leading membership organisation supporting professional ecologists and environmental managers in Ireland and the United Kingdom welcomes the opportunity to participate in this consultation process.

CIEEM was established in 1991 and has over 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of a number of organisations including:

- The Environmental Science Association of Ireland
- Irish Forum on Natural Capital
- Europarc Federation
- European Network of Environmental Professionals
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- The UK All Party Parliamentary Group on Biodiversity
- The UK Environmental Policy Forum

CIEEM has approximately 250 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers whose work involves sustainably managing land, water and species.

Comments from CIEEM

CIEEM welcomes the opportunity to participate in the review of the Draft 3rd National Biodiversity Action Plan.

The review has been undertaken by the CIEEM Irish Section Policy Review Group which comprises fourteen experienced, Irish-based, practitioners and specialists with a wide breadth of knowledge across the ecological and environmental management spectrum in Ireland.

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The Draft NBAP is a large, complex document and for this reason we are providing our detailed comments in tabular form to facilitate cross-referencing. The table below is in A3 format but may be scaled to print at A4 if required. It is in three sections:

- Detailed review comments on content: text, Objectives, Targets and Action Points etc. (pp 1 to 7; comments 1 -110)
- General comments: largely from individuals but which we consider will be of interest / use to the editors of the NBAP (pp 7 to 8; comments 111 to 124)
- General observations on typographical errors, formatting glitches etc. (p8; comments 125 to 130).

Overall, we consider the Draft NBAP provides an informed summary overview of the state of Ireland's biodiversity with a good vision of what is required with - for the most part - appropriate targets and actions.

There are however, some issues of concern listed in the detailed table of comments below that include, amongst others:

- Absence of actions in relation to Natural Heritage Areas and an apparent over-reliance on Natura sites
- Lack of actions for biodiversity in urban areas

We also note that there is no Action in relation to the potential impact on biodiversity of Brexit which is expected to come into effect during the life of the Plan.

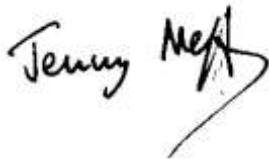
As CIEEM is the professional representative body of ecological practitioners who record and evaluate Irish biodiversity throughout their work, including within the context of planning and development, we consider that it would have been useful if CIEEM had been able to input to the NBAP prior to the public consultations stage.

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CIEEM members are knowledgeable about natural heritage and, as a professional body representing practicing ecologists, CIEEM is well placed to advise on specific areas of biodiversity.

CIEEM would welcome any opportunity to discuss amendments to the NBAP and is willing to assist as appropriate – at any stage, including reviewing/commenting on proposed amendments as they become available.

Indeed we propose, as stated above and in the detailed comments provided below, that CIEEM should be a member of the Biodiversity Forum and Working Group.

A handwritten signature in black ink that reads "Jenny Neff". The signature is written in a cursive style with a large, sweeping flourish at the end.

Jenny Neff BSc(Hons) MSc(Ecol) CEcol CEnv FCIEEM

Vice-President (Ireland) of the Chartered Institute of Ecology and Environmental Management (CIEEM)

Full contact details for Jenny Neff are provided in the covering email.

CIEEM (Irish Section): Consultation response submission on the Draft 3rd National Biodiversity Action Plan / Table of Comments 20-01-17

Response Comment No.	PAGE NUMBER	HEADING /OBJECTIVE /TARGET	PARAGRAPH / SECTION/ TARGET /ACTION NO.	CIEEM IRELAND - RESPONSE / COMMENT
1	2	Objectives and Targets of Ireland's NBSAP	Targets 4.1 and 6.1	Targets 4.1 and 6.1 are key and highly challenging; and in the case of 6.1 the breadth of actions proposed are very limited and highly unlikely to achieve the target. They are limited largely to peatlands, forestry, woodlands, agricultural subsidies and birds. The actions must include those for decision makers (eg consenting forestry), should include protection of change of land-use without consent and the need to include targeted restoration beyond peatlands. Proposing to achieve 'no net loss of biodiversity' largely through generic agri-environment schemes will be likely to result in no net loss of generic habitats / species and will not take account of biodiversity that is specific to an area or important from a strategic perspective. There is probably a need to link Targets 4.1 and 6.1 so that the 'no net loss' policy is appropriately targeted.
2	6	Ireland's biodiversity (heading on previous page)	Paragraph 2	The risks involved in "greenwashing", i.e. promoting products or practices as being sustainable or benefitting biodiversity, in the absence of evidence, should be highlighted here. There is the potential for trying to benefit from a "green image" while simultaneously ignoring or even degrading biodiversity.
3	6	Ireland's biodiversity (heading on previous page)	Paragraph 2	Need to mention parks as important resources for Irish people.
4	7	The State of Ireland's Biodiversity	Figure 4	Figure 4 needs to be updated with the new vascular plant Red List (2016)
5	11	Ireland's responses to biodiversity loss	Paragraph 3	Have the reasons for not fully implementing actions of the 2nd NBAP been assessed? Such an assessment is necessary to ensure that the actions of the 3rd NBAP are not implemented for the same reasons.
6	14	Table of Actions, Objective 1	Paragraph 1	States:"To support locally-led action to safeguard biodiversity and ecosystem services additional biodiversity-related guidance for Local Authorities will be published". This will need to be held to account and how will this be done?
7	15	Target 1.1		A further action under this Target is suggested as follows: "Local Authorities to seek to integrate an ecological assessment element to all planning applications ie not just those which are above threshold or require AA". At present there is an ecological gap whereby planning applications for small developments may involve hedgerow removal, demolition of buildings, drainage of a wetland, but account of these piecemeal but cumulatively significant ecological impacts is not required. In some cases where a screening assessment is completed, the development may not impact on the SAC or SPA, but may have other impacts of local biodiversity importance. At present there is no channel to report on these impacts.
8	14/15	Target 1.1	Action 1.1.1	Private sector actors should include IBEC (as the body with direct relationships with business and industry and which has an environmental policy section) to encourage and ensure that biodiversity is on the agenda. See also the comment under Objective 3 below (comment 49).
9	15	Target 1.1	Action 1.1.1	No net loss target: what is the baseline monitored against? - from when, current status or historical given the depleted status of biodiversity in Ireland.
10	15/16	Target 1.1	Action 1.1.1. All public authorities and private sector move towards no net loss of biodiversity ...	The monitoring, reporting and actions taken as a result of this target should be built into each plan or project e.g. to examine how successful the strategy or mitigation is, and what actions are needed to address any identified issues. It would help to allocate a person responsible for overseeing the success or otherwise of no net loss of biodiversity in each project or plan otherwise there may be no real tangible result.
11	15/16	Target 1.1	Action1.1.1	The enforcement of conditions of planning is often required for mitigation related to biodiversity but with limited resources the competent authority may not be able to carry this out. Therefore reporting to the competent authority on mitigation and monitoring by a consultant on behalf of the proponent of the project or plan may be required more and more in the future.
12	15/16	Target 1.1	Performance Indicator for Action1.1.1	It is unclear how BnM restoration etc. achieves no net loss. It is considered that the NBAP should be looking to more agencies (other than just than EPA and BnM) and it should be a target to add agencies such as OPW, Dept Agriculture etc. to this list.
13	16	Target 1.1	Action 1.1.3 Strengthen ecological expertise in public authorities	This action is welcome and badly needed. Lack of ecological expertise is a critical barrier to conserving and enhancing biodiversity. The equivalent action in the 2nd NBAP was notably not achieved.
14	16	Target 1.1	Action 1.1.3 Strengthen ecological expertise in public ...	It is considered that every local authority to have a biodiversity officer or share one if they cannot justify the cost of one per local authority.

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15	16	Target 1.1	Action 1.1.3 Strengthen ecological expertise in public authorities	Biodiversity Officers are very important. However the lack of ecological expertise, with a clear role alongside engineers in planning and development remains a weakness in the Local Authority system. There is room for both Biodiversity officers and ecologists in Local Authorities (unless the BO is a qualified ecologist). Until ecology is viewed as a professional requirement within Local Authorities, alongside other professions such as engineers and planners it will remain challenging to ensure that ecology is fully and appropriately considered within the planning process. While it is welcome to train staff in Local Authorities in Biodiversity, it is equally important to ensure that ecology is not seen as something that all staff can become trained in. (This is happening for example with regard to Screening and Appropriate Assessment, where Local Authority staff are expected to undertake assessments which require ecological expertise).
16	16	Target 1.1	Action 1.1.3	This action should be expanded to include reinstating the Natural Heritage officer position at the Heritage Council
17	16	Target 1.1	Action 1.1.3	An additional action along these lines should be a review of the capacity and structures of NPWS to fulfil their remit. Additional resources must be committed to improve them if the review finds deficiencies.
18	17	Target 1.1	Action 1.1.5. In consultation with Local Authorities	It would be useful to know deadline dates for the guidance they mention otherwise to ensure that they are kept on target.
19	17	Target 1.1	Action 1.1.5	Suggest that this could be extended to include consultation with, for example CIEEM? Professional ecological practitioners inputting into the planning process could suggest (through CIEEM) where guidance would be helpful e.g. minimum ecological survey/ reporting standards. In many instances currently these standards are being steered by ABP decisions rather than informed guidance from NPWS.
20	17	Target 1.1	Action 1.1.5	In order to assist non-specialist planning officers in making decisions on planning applications, it would be beneficial to provide clear guidance for planning authorities. For example, the Northern Ireland Environment Agency have recently published a Biodiversity Checklist for planning applications, which provides step-by-step guidance on the situations in which surveys of different ecological features may be required. It is recommended that similar guidance is prepared by the Irish government in order to provide clarity for planning authorities and to ensure that ecological features are addressed appropriately and consistently throughout the state and that the NBAP reflects this.
21	18	Target 1.1	Action 1.1.8	For the valuation of water services it would be beneficial to include an assessment of the importance of natural habitats (notably peatlands and undrained grasslands) for the attenuation of rainwater and prevention of flooding. The report should discuss the link between artificial drainage of peatlands / agricultural land and floods in lowland sections of watercourses – vital ecosystem services
22	19	Target 1.1	Action 1.1.11	Under Performance indicators - 2. Level of support for development of farmland habitat management plans. Great to see this included assuming "support" means a quantifiable monetary value. Similar Performance Indicators should be included throughout the entire plan to identify the level of support going to biodiversity conservation.
23	19	Target 1.1	Action 1.1.11	Under Performance indicators - There is no biodiversity outcome measure.
24	20	Target 1.1	Action 1.1.12	Structural frameworks and policies that act as perverse incentives should also be identified and remedied. For example, the principal objects of Coillte under the Forestry Act 1988 are commercial with no core requirement for biodiversity conservation.
25	20	Target 1.1	Action 1.1.12 Identify and take measures	2021 is a long time to address the current situation of perverse incentives that are damaging SAC habitats (most particularly damaging habitat to "make eligible land". The timeline could be considered to be contrary to the Habitats Directive and it is suggested that it is changed to 2017-2019.
26	20	Target 1.1	Action 1.1.12	Many incentive schemes impact on biodiversity (eg. under GLAS, up to 750m of hedge can be coppiced). This does not allow for rotation of small linear sections and such large scale works have the potential to wipe out scarce species such as small eggar (cited as 'Near Threatened' in Macro Moths Red Data List – 2016), which rely on 2nd year growth on hawthorn and blackthorn. For real avoidance of biodiversity impact, farm advisers need to be properly trained in biodiversity (including local biodiversity targets) and need to undertake better biodiversity audits (including surveys at the right time of year).
27	20	Target 1.1	Action 1.1.12	It is unclear in the baseline column of the table how or when this target is to be achieved
28	20	Target 1.1	Action 1.1.13	Any mechanism needs to be carefully evaluated as can lead to perverse impacts. For example windfarms on peatland sites.
29	20	Target 1.1	Action 1.1.14 Monitor the implementation of this Plan	It would be useful to see the outcome of the 4 meetings, the issues raised and actions proposed. Nothing is noted under the 'related actions' column
30	20	Target 1.1	Action 1.1.14	It is proposed that CIEEM would have a role with the BWG etc in this context.
31	20	Target 1.1	Action 1.1.15	Pleased to see this included and it is absolutely essential. This is an ambitious plan which must be properly resourced to ensure delivery.

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32	21	Target 1.2	Action 1.2.1	It is considered that this legislative action should be extended to "to ensure that conservation and sustainable use of biodiversity are taken into account in all relevant plans and programmes and in all planning decisions"? The introduction provides a strong and clear context for protecting biodiversity and there is discussion regarding the need to address this at a sectoral level, however the piecemeal loss of biodiversity through small developments is significant and can often only be addressed at the planning level.
33	21	Target 1.2	Action 1.2.4. Review Flora Protection Order	There is an urgent need for a fauna protection order. Suggest add an action to produce a fauna protection order. Experts have already recommended species so it should not take long to add as an amendment to the Wildlife Acts.
34	21	Target 1.2	Action 1.2.4.	Reference to Section 40 of wildlife act may need to be revised if the proposed pilot scheme changes come into effect in respect of widening the cutting/burning periods from Heritage Bill 2016.
35	21	Target 1.2	Action 1.2.4.	In respect of the "Further review Section 40 to ensure control of invasive species may be carried out subject to screening process in the summer months". This is crucial and needs to happen sooner rather than later. The control of most terrestrial invasive plants is dependent on systemic herbicides which, by nature, need to be controlled in the summer months. This should be linked to best practice information on mechanical control and other methods – also disposal of material.
36	22	Target 1.2.	Action 1.2.7 Publish legislation to address required provisions under the EU Regulation on invasive alien species (No. 1143/2014)....	This issue does not just require legislation but also proper and well informed advice and education to all stakeholders involved. The risk assessments are a way of highlighting the risk but it is how they are managed and treated that is critical. This is becoming a serious issue, both in terms of halting some projects but also as to how invasives are been managed on the ground. Currently available information is confusing, especially in respect of Japanese knotweed; and the treatment of invasives is being left to a handful of contractors managed by project managers who are not necessarily aware of the implications of the spread of invasives or indeed the impact on biodiversity.
37	21	Target 1.2		An Action point in relation to providing a legal basis for the establishment of local nature reserves would be a useful addition.
38	22	Target 1.2.	Action 1.2.7	In particular implementation of Article 19 (Management Measures) and Article 20 (Restoration of the damaged ecosystems) will require significant financial and staffing input in order to deal with the situation in Ireland. It is considered that this needs to be acknowledged at a minimum and, ideally, committed to within the NBAP.
39	22	Target 1.2.	Actions 1.2.7 and 1.2.8	No PI identified
40	25	Objective 2		Land use is a significant driver and should be included here.
41	26	Target 2.1		In general, most of the emphasis in these actions is on improving knowledge on existing biodiversity rather than improving knowledge and methods for biodiversity conservation and restoration. It is considered that more emphasis needs to be put on addressing biodiversity loss.
42	26	Target 2.1		It is considered that an additional action should be to provide best practice guidance to ecological practitioners on impact assessment, especially Appropriate Assessment and cumulative impact assessment. Actors / key partners would be DAH, EPA and CIEEM. Performance indicator would be guidance produced. Baseline guidance of relevance includes existing AA guidance for local authorities and CIEEM guidance on EclA in UK and Ireland (2016).
43	26	Objective 2	Actions	It is suggested that an additional action point under this objective could be for "NPWS to facilitate and support the development of a data sharing mechanism (where data is derived through EclA and AA) or at least to explore the possibility of collating data from site level assessments for wider use". This is particularly relevant for mobile species such as birds and cetaceans but is also relevant for habitats and all species groups within the context of cumulative impact assessment which is currently not properly addressed in the impact assessment process.
44	26	Target 2.1		An additional Action under this objective would be to include a national habitat map to Level 3 Fossitt.
45	29	Target 2.1	Action 2.1.9	Include Local Authorities and Irish Wildlife Trust under Actors and Partners
46	29	Target 2.1	Action 2.1.10	No PI identified
47	30	Target 2.1	Action 2.1.11 Enhance knowledge of the most significant direct and indirect causes of biodiversity and ecosystem	It is considered that this action is far too general in its scope and perhaps should be broken into a group of related actions. Perhaps this would be more usefully tackled if broken into sectoral actions, e.g. agriculture, forestry, development & infrastructure, renewable energy, etc. Actions targeted on already known or suspected causes of biodiversity loss, such as inappropriate grazing levels, could be usefully made more specific. If such a breakdown is considered too detailed for a national plan, then the plan should require sectoral plans/policies (under action 1.1.1) to include actions on researching causes of biodiversity loss and mitigation measures.

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48	30	Target 2.1	Action 2.1.11	Regarding the prevention and mitigation options element, there is a scarcity of research providing evidence of effective mitigation measures. Research should be carried out reviewing ecological mitigation that has already been included in past projects and evaluating its effectiveness.
49	30	Target 2.1	Action 2.1.12 Continue forest research programme ...	Where public funding has been used to produce reports, such reports should be published and made available to all. This is not currently the situation.
50	30/31	Target 2.1	Action 2.1.13 Enhance the capacity to build and maintain the human resources, systems	Loss of taxonomy skills are severe and will not be balanced by identification skills, and identification and taxonomy should not be confused. Funding of taxonomic specialists and museum resources are important to prevent the continuation of the decline in this speciality. Collaboration of funded postgraduate projects through museums with third level institutions would help.
51	30/31	Target 2.1	Action 2.1.13	Similarly loss of identification skills. Note that CIEEM provides training courses to members and non-members on a range of ecological and environmental management subjects, including species identification and management.
52	31/32	Target 2.1	Action 2.1.16	Red Lists for vascular plants was published in 2016, but elasmobranchs not? Others?
53	32	Target 2.1	Action 2.1.17 Build upon Red List assessments	Red list endangered animal species should be added to a fauna protection order
54	32	Target 2.1	Action 2.1.17	Perhaps consider the publication of national / provincial / regional lists of priority species, similar to the approach used in Northern Ireland?
55	32/33	Target 2.1	Action 2.1.20 Expand the network of long-term monitoring schemes to enable tracking	There is currently no mechanism for funding the continuation of long term datasets. As a consequence very valuable continuity on sites such as Pollardstown Fen has been compromised. A list of long term sites should be prioritised and used in international collaborative studies and be available for prioritisation of funding. Suggest NRA, Local Authorities be added to the key players for this
56	34	Target 2.1	Action 2.1.23 Review priorities for restoration....	The review should include restoration methods and the knowledge base with improving these as a key part of the follow-up programme.
57	34	Target 2.1	Action 2.1.24	This action will require very careful consideration. Some habitats are irreplaceable and what timeframe will be considered. Is it possible to replace / offset a habitat which takes hundreds or thousands of years to evolve such as replacing ancient woodland by planting trees?
58	34	Target 2.1	Action 2.1.26	Under the PI include amount of funding also?
59	35	Objective 3 Increase awareness and appreciation of biodiversity and ecosystem services		It is considered that the NBAP should include a commitment /action to require businesses (industries) which have substantial landholdings - to develop their own BAPs (where appropriate in accordance with specific industry sector standards / guidance such as the BAP requirements in the Oil and Gas Sector) and to adopt guidance for businesses in respect of biodiversity such as the All-Ireland Pollinator Plan Business Guide and Notice Nature biodiversity guidelines etc See also the above comment (comment 8) under Target 1.1 in relation to role for IBEC in this
60	36	Target 3.1	Action 3.1.1	Include Local Authorities under Actors and Partners.
61	36	Target 3.1	Action 3.1.1	It's not accurate to state that "local communities are the ones who can most directly benefit from those ecosystems". Note the statement on Page 58 that "Protected areas are the primary source of drinking water for over a third of the world's largest cities". The local community may feel disadvantaged eg no sheep farming to protect drinking water supply.
62	36	Target 3.1	Action 3.1.2 Enhance training, communication, cooperation and concerted action	There is currently no strategic training for competent authorities undertaking Appropriate Assessment - poor biodiversity assessment skills by planning authorities are contributing to biodiversity decline. A strategy of ongoing training is needed. This may need to be a separate action but the lack of training in this area is a major source of damage and has resulted in a number of European complaints. A training strategy with a short deadline would be ideal to add.
63	36	Target 3.1	Action 3.1.2	It is proposed that CIEEM be included in the list of Actors / key partners
64	37	Target 3.1	Action 3.1.4	A potential performance indicator in relation to this could be the number of talks facilitated by academia/research institutions etc. that are aimed at the public?
65	38	Target 3.1	Action 3.1.7	Under Performance Indicator 2. Include Geography. Also it would be useful to evaluate the number of students studying ecology within biology.

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66	38	Target 3.1	Action 3.1.7	The current baseline is very primary school focussed which should be addressed.
67	39	Target 3.1	Action 3.1.8	There is no measure on understanding. How will behavioural change be measured?
68	39	Target 3.1	Action 3.1.9	A potential performance indicator in relation to 3.1.9 could be the number of farmers in agri-environment schemes.
69	39	Target 3.1	Action 3.1.9	Although soils are mentioned, there is no Performance indicator, and nothing under the baseline to indicate that soils will be addressed within this action.
70	40	Target 3.1	Action 3.1.11	Include Local Authorities under Actors and Partners.
71	42	Target 4.1		See comment no 1 above in relation to Targets 4.1 and 6.1
72	42	Target 4.1	Action 4.1.1 Development and implementation of agri-environment schemes (AES)	There are multiple examples of NPWS being contacted for damaging farming practices with no action being taken and lack of sufficient legislation being cited - perhaps this is lack of ranger training? Cross compliance is not being implemented so suggest a further Action point on training and recording of cross compliance such that data is available for Habitat's Directive Article 17 reporting. Suggest also that DAHRRGA are added to the key players.
73	43	Target 4.1	Action 4.1.3	The performance indicator "Number of bog sites with restorative activities completed" is a much better indicator and should be replicated in actions throughout the plan.
74	45	Target 4.1	Action 4.1.9	Again the performance indicator "Number of Actions implemented" is a much better indicator and should be replicated in actions throughout the plan.
75	46	Target 4.2	Action 4.2.1 Continue to protect, enhance and monitor water quality	Baseline section mentions that the first cycle River Basin Management Plans (RBMP) 2009-2014 has been prepared. Should this be 2009-2015?
76	46	Target 4.2	Action 4.2.1. Continue to protect, enhance and monitor water quality	Water quality is often compromised owing to water quantity through drainage or abstraction. The role of hydrological function and water quality needs to be included here or in a separate action point.
77	47	Target 4.3	Action 4.3.1 Ensure that Flood Risk Management	It is important to add DAHRRGA to the key partners here
78	47	Target 4.3.	Action 4.3.1 Ensure that Flood Risk Management (FRM) planning and associated SEA, EIA and AA, minimises loss of management	A review and assessment of whether this target has been achieved in any of the CFRAMS in Ireland as part of this target is suggested. <i>A comment from a consultant's personal experience as an ecologist in large consultancy:</i> " It hasn't happened. The Flood Relief Schemes are been driven by engineers and the MCA - the MCA gives the most economically viable option firstly. It does try to avoid Stage 4 of AA but overall it is resulting in mainly hard structures and not soft options. This is a very unrealistic target and while it would be good to be able to say that it is achievable but with the public pressure on getting schemes done before the next flood - it is not. On a positive note OPW will be provided with Environment Training for their Flood Risk Management Plans to try to address these types of issues. "
79	47/48	Target 4.3	Action 4.3.2 All significant drainage (arterial drainage), including both initial	A timeline is missing here. DAHRRGA should be added to the key players here
80	48	Target 4.4	Action 4.4.2 – eradication and control of invasive species	Suggest an Action in relation to secure disposal of invasive species material. It would be beneficial if some landfill operators could be assisted with the development of management strategies for the receipt and treatment of invasive species. As a starting point, one landfill could be identified in each province.
81	48	Page 48 -	Action 4.4.2	There is mention of setting up a working group but it would be very useful to fund the Invasive Species Ireland Project which was all Ireland initiative and produced a co-ordinated approach on invasive species on an All-Island basis. The funding of ISI would contribute to all the actions within Target 4.4 and other targets within the plan.

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82	48/49	Target 4.4		No mention of Invasive Species Ireland's role/guidelines/website etc.
83	49	Target 4.4	Action 4.4.4. Continue to produce Risk Assessments for potentially invasive non-native species	See comment above at Action 1.2.7. The risk assessments are a way of highlighting the risk but it is how they are managed and treated that is critical.
84	49	Target 4.4	Action 4.4.3	The PI is "Number of new plantings that use native species for landscaping". Is this 100% native species or will 5% or less count?
85	49	Target 4.5		There should be an action here implementing the programme of restoration activities that was developed in Action 2.1.23
86	51	Target 4.5	Action 4.5.4	This action appears to summarise the entire NBAP. It is considered to be far too general and should be clarified or removed.
87	51	Target 4.5	Action 4.5.4	No PI identified
88	52	Target 4.5	Action 4.6.2	No PI identified
89	52	Target 4.6	Action 4.6.2	Members of the public should be encouraged to report crimes under the Wildlife Acts or Habitats Regulations. Relevant information should be made available on the Department's website, including examples of activities that are illegal, and details of government departments that should be informed. Key areas for public reporting would include: burning of vegetation during the bird nesting season, persecution of protected fauna (e.g. badgers, bats, hares), use of poisoned bait for birds and foxes, etc
90	53	Target 4.6	Action 4.6.4 and 4.6.5	No PI identified
91	55	Target 5.1	Action 5.1.2	The PI mentions measures under the MSFD however will this be sufficient for habitats and species outlined in the Habitats Directive? If not include a separate PI.
92	55	Target 5.1	Action 5.1.3	Actors under this section might also include BWI as bird survey monitoring extends to near shore and intertidal waters.
93	56	Target 5.1	Action 5.1.4	Training is required for the sector
94	58	Objective 6: Expand and improve management of protected areas and legally protected species		pNHAs and NHAs are referred to in this Objective but don't appear to have any targets or action points associated with them. As National designations these should be included.
95	58	Target 6.1		See comment no 1 above in relation to Targets 4.1 and 6.1
96	61	Target 6.2		<i>It is very concerning that there is no mention of progressing the designation and conservation of the NHA network in this target or in the plan at all.</i> Biodiversity conservation targets cannot be met by focussing solely on the Natura 2000 network.
97	61	Target 6.2	Action 6.2.1	Consider the adoption of 'Local Nature Reserves' in Ireland?
98	61	Target 6.2	Action 6.2.1	Connectivity has differing meanings to people. Often it is viewed solely as connecting sites for human use with associated disturbance issues. It's important to identify the difference in habitat connectivity and that human access requires management and may even be undesirable.
99	62	Target 6.3	Actions 6.3.1	Any guidance needs to be underpinned with facilitating information and policy. The approach must be to have a targeted approach where features are noted as important (eg within County BAPs) and their strategic importance is understood (eg full connectivity for bats and minimum distances to other areas of suitable habitat for marsh fritillaries etc). This is an area where, if not done properly, will not be implementable. Because so much habitat loss falls outside the planning process, a 'change of use consent' process is likely to be required to deal with this issue properly.
100	64	Objective 7	Last Paragraph	Suggest that this needs to acknowledge possible Brexit implications.
101	66/67	Target 7.3	Action 7.3.1	It is considered that a specific topic of North-South harmonised action should be development of an All-Ireland vegetation classification scheme.
102	67	Target 7.3	Action 7.3.3	No PI identified
103	67	Target 7.4		Include an Action to raise awareness amongst the public re issues such as palm oil and Brazilian beef.
104	67	Target 7.4	Action 7.4.1	The EPA Green Procurement document is cited as a baseline for this Action. However this document mentions biodiversity only once and that is in relation to fish labelling. It is therefore not considered to be a reasonable baseline document in this respect.

Response Comment No.	PAGE NUMBER	HEADING /OBJECTIVE /TARGET	PARAGRAPH / SECTION/ TARGET /ACTION NO.	CIEEM IRELAND - RESPONSE / COMMENT
105	67	Target 7.4	Action 7.4.4	No PI identified
106	69	References		Please include CIEEM's EclA guidelines (as referred to above in comments) and as referenced by EPA guidance etc. Correct citation is: "CIEEM (2016) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester" http://www.cieem.net/data/files/Website_Downloads/Guidelines_for_Ecological_Impact_Assessment_2015.pdf
107	69	References		Please include CIEEM's (IEEM 2010) marine and coastal EclA guidelines. Correct citation is: "IEEM (2010) Guidelines for Ecological Impact Assessment In Britain and Ireland Marine and Coastal Institute of Ecology and Environmental Management, Winchester" http://www.cieem.net/data/files/Resource_Library/Technical_Guidance_Series/EclA_Guidelines/Final_EclA_Marine_01_Dec_2010.pdf
108	73	Appendix I		CIEEM: Chartered Institute of Ecology and Environmental Management to be added to list of acronyms as it is mentioned under Action 2.1.13 but not included in the Appendix.
109	76	Appendix II		CIEEM should have been consulted prior to issuing this draft. Also, the absence of input from or related to Coillte, Ireland's largest landowner, is notable. Coillte should comment on this plan before finalisation and be included as a key actor where appropriate.
110	77	Appendix III		As Ireland's leading body representing more than 250 professional ecological (biodiversity) professional practitioners in Ireland, CIEEM should be a member of the biodiversity forum
GENERAL COMMENTS FROM INDIVIDUALS				
111	4 onwards	Introduction		Overall a good, factual and informed summary overview of the state of Ireland's biodiversity.
112	4	Introduction		It might be useful to have a short résumé of previous plans, showing what had worked and what had not worked and what should have been done differently >
113	8	The State of Ireland's Biodiversity		How does this data compare with previous decades and see comment above.
114	31		Action 2.1.13	It is noted that CIEEM is mentioned under Action 2.1.13. CIEEM is the professional representative body of ecological practitioners who are working daily with the recording and evaluation of biodiversity, including within the context of planning and development. It would have been useful if CIEEM were represented in the Working Group perhaps, to input to the draft document prior to the public consultations stage?
115		General Note		DAH is listed 43 times as the main or secondary actor in the implementation of the actions listed in the Plan. The NPWS is hugely under resourced and while the actions of the Plan are greatly welcomed does the DAH/NPWS have the capacity to undertake all of the Actions it has been/has committed to? Page 10 of the Plan notes that while 102 Actions were detailed in the second Plan, 24 were implemented and a further 67 are on-going with 11 requiring substantial further Action. Could an additional objective of the Plan to be as follows: to review the capacity of DAH/NPWS to implement the Actions of the new NBAP and where there is a shortfall in capacity for Government to commit the resources required for it to do so? This would underline the Government's commitment to realistic implementation of the Biodiversity plan and the biodiversity values and ecosystem services that it identifies.

Response Comment No.	PAGE NUMBER	HEADING /OBJECTIVE /TARGET	PARAGRAPH / SECTION/ TARGET /ACTION NO.	CIEEM IRELAND - RESPONSE / COMMENT
116	12	Monitoring an evaluating the implementation of this NBAP		The success of any BAP should also be measured by the extent of involvement by individuals or organisations which do not have statutory responsibility.
117		General comment /Vision		Vision is great
118		Resources /Funding		The plan has to be resourced adequately
119		Resources /Data		Baseline data and proper sampling systems are needed to be able to monitor the biodiversity resource. There are major gaps in our knowledge and datasets and this is not adequately addressed in the document. Also there is a need for robust verification of existing datasets.
120		Resources/Soils		Although nutrient cycling by soil organisms is mentioned in the document there are no actions on soil biodiversity. It is omitted from the document. See comment under Action 3.1.9 above also.
121		Resources/Urban environment		The urban environment is omitted from the document.
122		Resources/ Non-protected habitats and species		Wider biodiversity (ie non-protected habitats and species) is not addressed and it is these in general that are providing our ecosystem services.
123		Resources /Designated sites		There is over reliance on designated sites to deliver biodiversity outcomes. Whilst designated sites are an essential tool they will not deliver for wider biodiversity and in particular essential ecosystem services.
124		Resources /Performance indicators		In general performance indicators are such that may result in major biodiversity loss not being detected.
GENERAL: FORMATTING /TYPOS etc				
125	3	Summary of Objectives	Objective 6	Typo in last line
126	8	Figures 5 and 6		Check page layout
127	9	Pressures on Ireland's Biodiversity and Ecosystem Services	3 rd paragraph	Typos; missing comma in first sentence after 'species'. Last line – should read 'have declined' and not 'has declined'
128	26	Action 2.1.2		Numbering appears to be wrong
129	15 onwards		Pagination	Target headers on table not always repeated across relevant pages (eg. 16-20 vs 21-23)
130	64			Ramsar websites etc use 'Ramsar', ie not all in capitals as shown in NBAP – RAMSAR.