

CONSULTATION

Response Document



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**“Initial Consultation – Ireland’s National Energy & Climate Plan
2021-2030”**

Department of Communications, Climate Action and Environment

06 November 2018

Introduction to CIEEM

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

CIEEM was established in 1991, received Chartered status in 2013, and has 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.

Amongst others, CIEEM is a member of:

- National Biodiversity Forum (Ireland)
- Irish Forum on Natural Capital (working group member)
- The Environmental Science Association of Ireland
- Europarc Federation
- 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
- Greener UK

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, many of whom regularly provide input to and advice on SEA and AA.

Comments from CIEEM

CIEEM welcomes the opportunity to participate in the initial public consultation by the DCCAE on the National Energy & Climate Plan (NECP) 2021-2030 and would like to make a few considered comments on the consultation document, as follows:

Initial general comments from CIEEM

Whilst CIEEM broadly agrees with the Department’s template for the Plan, we consider that it would be mutually beneficial for CIEEM to engage with the DCCAE as the NECP is developed further and progresses in order to ensure that the Plan fully takes into consideration the need for the protection of habitats and species.

Response to questions posed (1 to 20)

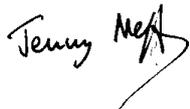
In respect of the questions posed and as set out at Appendix A of the consultation document, our initial response is in relation to those relevant to our sector, as follows:

No.	RESPONSE
4	<ul style="list-style-type: none">· In respect of marine renewables (use of ocean energy - wave action, etc): CIEEM would like to see any policies and measures taking the potential for impact on protected habitats and species in the marine environment (including marine, intertidal and coastal) into consideration.· In respect of the use of biofuels (biomass): CIEEM considers that policy makers should be aware of the potential risk of introducing non-native plant species for this purpose that may become invasive pest species in the future. Policies should be developed to ensure that such non-natives are properly regulated in this regard. <p>Note that this risk is not only posed by newly introduced non-native species, but also potentially by other non-native species already grown in Ireland which may not have been a problem to date though could become so as a result of changed conditions as a result of climate change.</p>
20	<ul style="list-style-type: none">· CIEEM would like to see an integration of policies and plans across sectoral interests to prevent conflicts. From the biodiversity perspective, it is hoped that the relevant polices and actions enshrined in the [draft] Biodiversity Climate Adaptation Plan would be included in the overall NECP.

CIEEM notes the programme and timeframe for future consultations, as set out in Section 1 of the consultation document, and would welcome the opportunity to comment on drafts as they become available, particularly in respect of any policies /measures which might have implications for habitats and species, especially those protected under Irish and European Legislation; and/or in relation to any nationally or internationally designated sites; and/or in

relation to protected species.

CIEEM is the professional representative body of ecological practitioners and environmental managers who record and evaluate Irish biodiversity throughout their work, including within the context of planning and development. Our members are knowledgeable about the natural heritage of Ireland and CIEEM is therefore well placed to provide advice to the DCCAE in respect of ecological aspects of the National Energy and Climate Plan going forwards.

A handwritten signature in black ink that reads "Jenny Neff". The signature is written in a cursive style with a long, sweeping underline.

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

Chair, CIEEM Ireland Policy Working Group

November 2018