

CONSULTATION

Response Document



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HERITAGE IRELAND 2030

Department of Culture, Heritage and the Gaeltacht

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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:

- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- 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 land management for the benefit of protected species and biodiversity in general.

Comments from CIEEM

CIEEM welcomes the opportunity to participate in the consultation process by the Department of Culture, Heritage and the Gaeltacht (DCHG) on the Heritage Ireland 2030 Plan. We should like to make some considered comments on the draft consultation document: Heritage Ireland 2030, as follows:

1. General Comments/Observations

- a. It is difficult to provide constructive comment on a Plan which is very high level. As presented currently the document is somewhat vague, has little detail, and does not list Actions for delivering on commitments. CIEEM would like the opportunity to review the Actions when available.
- b. Integrating the National Biodiversity Action Plan 2017-2021 (NBAP) objectives into Heritage Ireland 2030 would provide an appropriately sound basis for its aims, and strengthen the language and its objectives with regard to natural heritage.
- c. The NBAP should underpin Heritage Ireland 2030's approach to natural heritage. The NBAP states that Ireland's Vision for Biodiversity is: *"That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally."*

Members of the CIEEM, who work professionally for the betterment of our natural heritage, believe that biological diversity is a vital national asset that must be conserved in order to maintain a healthy and properly functioning environment that, not only provides ecosystem services to the benefit of all, but is able to mitigate the worst impacts of climate change for future generations.

As an immediate and necessary response to the current biodiversity crisis in Ireland, Government must prioritise the provision of significant short-term additional funding to enable the full implementation the *National Biodiversity Action Plan 2017-2021*, along with a long-term commitment; and begin to address the biodiversity crisis in tandem with climate action.

- d. It would be useful if a review of the current situation with regard to Heritage Policy was included in the Heritage Ireland 2030 final draft, including: the roles of the Heritage Council and Biodiversity Officers / Heritage Officers. Such a review should also include a review of the status of current Plans (eg NBAP, Landscape Plan etc) and how they are being implemented and to what effect.
- e. It is not clear how the plan will be implemented, or indeed who will be responsible for its implementation. There is an obvious leading or key role in this regard for the Heritage Council. If the Heritage Council were to be strengthened and properly resourced it would seem to be the obvious mechanism for the delivery of many of Heritage Ireland 2030's objectives.

- f. It is considered that perhaps the publication of the draft Heritage Ireland 2030 document was somewhat premature and it might have been better to have been published after the Biodiversity Conference 2019 when the feedback and commitments on funding and timeframe could have been incorporated - including the 'Seeds for Nature' commitments. It is recommended that these commitments should be included in the final draft.

2. Specific comments /observations in relation to the Heritage Ireland 2030 consultation document

Heritage Ireland 2030	
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5	Heritage Ireland 2030 should: <ul style="list-style-type: none"> Recognise and build upon the immensely valuable work of the Heritage Council in researching, promoting and raising awareness of the built and natural heritage; and Ensure that the NBAP is fully integrated into all Heritage policies and actions
5	Perhaps the three themes might be better and more clearly described as National Leadership, Partnership and Communities?
6	Para 2 refers to Our landscapes and how they nurture sense of place. Reference to biodiversity and provision of ecosystem services could strengthen the vision.
10	Paragraph 2: the word 'habitat' does not cover all aspects of natural heritage and should be replaced with 'Natural Heritage'.
10	Suggested further Objective: <i>Consolidating and properly resource the Heritage Council as a key organisation to date and currently in the delivery of Heritage Policy.</i> With additional resources this organisation can inform policy and training, provide coordination and seek to ensure that the national heritage objectives are indeed integrated at a national level and embedded in national leadership.
10	Theme 1, Objective 1: The current regulatory framework and governance structure can be at odds with the protection of designated areas (Natura 2000 sites in particular). Notably the combination of a lack of ecological expertise at Planning Authority level to facilitate review of ecological submissions can frequently mean that the conclusions of substandard submissions may be accepted without question when they may have the potential to impact on sites. Such a situation does a disservice to the protection levels attributed to such sites and can result in an increasing lack of confidence in the system among both practitioners and developers.
10	Theme 1, Objective 2: The integration of heritage protection and management considerations into all Government Departments should be an absolute prerequisite to confidence in the integrity of biodiversity protection. Currently there is a need for a sea change in attitude and approach in some departments. Such an integrated approach needs to be clearly demonstrated by all departments, including the OPW.
10	Theme 1, Objective 4: This is strongly supported and will require significant funding in order to be achieved.
10	Theme 1, Objective 5: It is unclear exactly what this means. Is it intended that, with respect to biodiversity, the ecosystem services that it provides, benefits for human health and well-being, and

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	its role in ameliorate potential climate change impacts will be better understood and recognised in financial terms? Such an objective should be made significantly clearer in order to lead to measurable actions.
10	Theme 1, Objective 6 CIEEM supports this strongly. Our organisation and its members are already involved in this and would welcome inclusion in discussions on specific requirements in in terms of training and job development. Many of our members have created heritage-related jobs and are an important consultation resource in this regard.
10	Theme 1, Objective 7: CIEEM strongly supports this, but we believe there is a need to fully qualify what is considered to be ' public good' in order to develop valuable and measurable actions.
10	Theme 1, Objective 9: CIEEM strongly supports this, and we look forward to seeing how it will be applied.
13	Paragraph 1: Partner organisations listed should include Biodiversity Officers (Currently 5 officers) along with the Heritage Officers.
13	Suggested Additional Objective: <i>Increase investment in, and continue support for, the National Biodiversity Data Centre along with its initiatives such as the All-Ireland Pollinator Plan.</i> The NBDC provides vital Natural Heritage information and resources, to government bodies, local authorities, researchers, communities and the general public.
13	Theme 2, Objective 1: CIEEM strongly supports this. In order to achieve this objective for Natural Heritage more investment is required. The recent announcement by the Government of investment to Natural Heritage/ Biodiversity is extremely small and does not reflect the value of Biodiversity and the ecosystem services it provides. A fundamental first step must be funding for Local Authority Biodiversity officers to support and implement biodiversity targets at a local scale.
13	Theme 2, Objective 1: Suggested Action: <i>Provide increased support for the Heritage Officers by employing Biodiversity Officers in Local Authorities to assist with Natural Heritage and assist with Outreach.</i> Local Authorities play a key role in biodiversity conservation through the planning system, the wide range of environmental services they provide and in dealing pressures such as climate change and providing nature-based solutions. This would also be in line with Action 1.1.4. of the NBAP - Strengthen ecological expertise in local authorities, and relevant Government Departments and agencies, and as the Heritage Council is the Lead/Partner this is very relevant to Heritage Ireland 2030. The indicators of this Action are as follows: 1. Number of full-time biodiversity officers in place in Public Authorities 2. Number of appropriately skilled staff in public bodies in terms of full-time biodiversity officers, there are only 5 in Ireland at the moment which is a very small number and 3 of the 5 are located in the Dublin Region.
13	Theme 2, Objective 4: CIEEM strongly supports this.

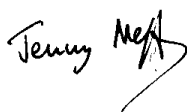
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	However, it is at odds with current cuts in project funding from the Heritage Council. Any commitments need to be made good on in order to regenerate confidence in Government's commitment to natural heritage.
13	Theme 2, Objective 8; should include NPWS
14	Theme 3, Objective 2: Without actions from communities, natural heritage would be suffering even more than it currently is. Community enthusiasm needs to be supported, properly funded and targeted. Local Biodiversity Officers would be an appropriate resource for helping target their actions more effectively.
13	Objective 7: Suggested Action: <i>Provide increased support for the All Ireland Pollinator Plan which has assisted local communities in working together to learn about pollinators, care for them, enjoy working together to help pollinators and to share their experiences.</i>
14	Theme 3, objective 6, p14 CIEEM strongly supports this. A proper and complete hierarchical protection for natural heritage at international, national and the local scales, in conjunction with properly funded and resourced Local Biodiversity Action Plans is what is required in order to properly focus local heritage protection.
15	How will the impact of Heritage Ireland 2030 be reviewed? Point 3: As a representative of many of the professional ecological community in Ireland, with a high level of experience of the implementation of natural heritage protection, as well as an important interface between natural heritage and business and communities, CIEEM would welcome involvement as a steering group stakeholder in the development and implementation of an Action Plan.

3. Responses to specific consultation questions posed

Heritage Ireland 2030 - Questions	
Question	Response
1. Contact Information	Irish contact details provided in the covering email
2. What is the most important thing Heritage Ireland 2030 needs to deliver?	Funding for the resources required in order to achieve the current actions of the National Biodiversity Action Plan 2017-2021
2. What is the most important thing Heritage Ireland 2030 needs to deliver?	Implement the NBAP. Integration of biodiversity policy across Government and statutory bodies /agencies is essential in order for this to be effective and successful.
3. What do you think of the vision for Heritage Ireland 2030? Is there anything we should add?	Please see above, our general and specific comments and suggestions in respect of additional text, objectives, noted omissions, actions etc.
4. What are the biggest challenges facing our heritage?	As President Michael D Higgins said when he addressed the recent National Biodiversity Conference "the model is flawed and there is a need for a new paradigm of connection between ecology, economics and ethics". The current system is letting down our natural environment and that runs right to the heart of how

Heritage Ireland 2030 - Questions	
Question	Response
	little we value it and therefore what attention we give it. The greatest challenge is to ensure that it is considered integrally with all other considerations. While it is a secondary consideration, it will always be considered to be an impediment to development rather than an essential component of sustainable development.
4. What are the biggest challenges facing our heritage?	Getting the diverse Government Depts to work together and to put biodiversity at the centre of decision making. If this done across the board then the negative perception of biodiversity versus development might begin to reduce.
5. What do you think of the draft objectives in the document? In your view, is there something important missing?	Please see specific comments above
6. What changes are happening right now that might impact on our heritage?	
7. How can we work better together and engage all our communities under Heritage Ireland 2030?	Please see our general and specific comments above.
8. How can we ensure Heritage Ireland 2030 delivers? 9. Do you have any further feedback?	

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 land, habitat and species management. Our members are knowledgeable about the natural heritage of Ireland and CIEEM is therefore well placed to provide input and advice to the Department in respect of the implementation of ecological aspects of the Heritage Ireland 2030 Action Plan going forwards. As referred to above, CIEEM would welcome involvement as a steering group stakeholder in the development and implementation of an Action Plan.



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Chair, CIEEM Ireland Policy Working Group

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