

CONSULTATION

Response Document



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Consultation on

Ireland's Biodiversity Sectoral Climate Change Adaptation Plan

The Department of Culture, Heritage and the Gaeltacht

17 April 2019

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. We have provided responses on many consultations to date, including several for the Department of Culture, Heritage and the Gaeltacht.

Comments from CIEEM

CIEEM welcomes the opportunity to participate in the consultation process on Ireland’s Biodiversity Sectoral Climate Change Adaptation Plan

The consultation document has been reviewed by experienced ecologists who are members of the CIEEM Ireland Policy Working Group and the following comments are from the perspective of practising professional ecologists who assess and work with Ireland’s biodiversity on a daily basis

General comments are provided in Section A below, specific comments on the consultation document are provided in Section B below, with reference to page and section numbers. Responses to the specific consultation questions are provided in Section C.

A. General Comments on the draft guidance document

CIEEM welcomes the Plan, especially as for the most part it is clear and concise, sending a strong and urgent message. It is noted however that its language may not be fully accessible to everyone, thereby potentially limiting reaction and response from the general public.

CIEEM welcomes and supports the fact that an objective of the Plan is to implement in full the National Biodiversity Action Plan 2017-2021.

It is noted that certain state/semi-state bodies with considerable land assets such as Coillte Teo and Bord na Móna are not represented on the working groups though their inclusion and engagement would seem to be critical and they are an actor in Objective 1.2.

B. Specific comments /observations on the consultation document

Page	Heading / Section / Paragraph / Bullet No.	Comment /observation
10	Background/1.1	Biodiversity is described in the context of EU habitats and species and does not include all of Irelands Biodiversity, or indeed much of the biodiversity that people are familiar with. Information on Ireland’s biodiversity is available from the National Biodiversity Data Centre. It would be useful to describe biodiversity in terms of locally and nationally important habitats and species, as well as European, so that the wider community are more likely to connect with biodiversity and the Plan itself.
14	Section 2.1	In addition to the Core Team, it is suggested that a full-time project manager and/or administrative officer should be engaged to oversee the implementation of the Plan, or perhaps this is already planned?

Page	Heading / Section / Paragraph / Bullet No.	Comment /observation
22	Category 'Degradation of habitats'	It is suggested that this might be changed to 'Loss and/or Degradation of habitats.'
22	Category 'Degradation of habitats'	Perhaps another bullet point could be added to address the increasing loss of trees owing to: storms; removal of trees because of H & S concerns from public; losses as a result of flood protection schemes. This tree loss is compounding the loss of Carbon Sequestration services, thus in turn compounding climate change and impacts on biodiversity.
31	6.1 Goals and Objectives. Objective 5	It is very important that sufficient funding is provided. It is noted, however, that funding provided by the government to Local Authorities to tackle invasive species last year was under €5k which does not suggest that the matter is being taken seriously - even though invasive species is one of the priority impacts of climate change.
33	Table 2 Overall comment regarding Objectives	Table 2 provides timeframes of Short term, Medium term and Long term. It is not clear what is meant by these terms. It is suggested that an explanation be provided as to what constitutes Short Term etc in terms of years.
33	Table 2 Overall comment regarding Objectives	Similarly, it is unclear what the relative values attributed to 'Resources' means. Does it mean labour, funding? What do High, Medium and Low refer to? It is suggested that some explanation / clarification is provided in this regard.
33	Table 2 Overall comment regarding Objectives	Following on from the above two comments regarding the lack of clarity around Timeframe and Resources: It is considered that this lack of clarity does not help in trying to understand how realistic it is to achieve the objectives. More precise, confirmed timeframes and resources would be welcomed.
33	Table 2 Overall comment regarding Objectives	It is vital that these objectives and actions are implemented.
33	Table 2 Objective 1.1	Does this include all biodiversity or just EU protected habitats and species? Actors: to include the NBDC.
33	Table 2 Objective 1.1	Objective 1.1 lists schools as an actor in delivery of the NBAP. This should also include 3rd level institutions. There are many relevant initiatives underway at 3rd level which are relevant to the NBAP and would not be covered under academic

Page	Heading / Section / Paragraph / Bullet No.	Comment /observation
		research (green colleges, outdoor play workshops, invasive species monitoring by students).
33	Table 2 Objective 1.2	It is considered that the enhancement and restoration of riparian habitats should be included, especially as these are so important to Climate Change, Flood resilience and Ecosystem Services.
33	Table 2: 1.3	<p>“Establish an all-island invasive species programme to monitor the spread of terrestrial, aquatic and marine invasive species in a changing climate and control invasive species where their spread is considered problematic.”</p> <p>Also include species used in agricultural diversification, such as non-native species grown for biofuel where the potential impact of rising temperatures on them is unknown, and any naturalisation / spread would be of concern.</p>
33	Table 2	Perhaps CIEEM is a relevant Actor in the implementation of the Plan? Given the extent of survey work undertaken by ecologists country-wide and the assessment of potential impacts of proposals (taking account of climate change, where appropriate), there would seem to be a role for ecological consultants here.
33	Table 2: 1.1	<p>“Resource and implement the National Biodiversity Action Plan 2017-2021 in full”.</p> <p>This statement is welcomed.</p>
33	1.2 and 1.6	<p>The restoration of degraded peatlands is a key priority to reduce degradation of carbon stores, and to increase the carbon sequestration capacity of these habitats.</p> <p>As a method to increase the scale of restoration works, could the restoration of blanket bog be included in agri-environment schemes for farmers in western or upland areas, e.g. as a component of GLAS, the NPWS Farm Plan Scheme, or via different scheme?</p> <p>Landowners could receive grants to cease peat extraction, to block drainage channels, to exclude livestock from areas subject to excessive poaching, or to re-profile heavily eroded areas.</p> <p>Suggested that this would this be added as a separate action of the Plan?</p>
34	Table 2, Objective 2	<p>A suggested additional objective:</p> <p>Improve understanding of the impacts of climate change on biodiversity, could be that we decide to record climate change impacts, note species activities which are unusual, early arrival of migrants etc., invasive species, effects of extreme weather events.</p> <p>This could be done through the NBDC, but agree to/acknowledge this objective as ecological consultants/CIEEM? (Acknowledging data ownership issues).</p>

Page	Heading / Section / Paragraph / Bullet No.	Comment /observation
35	Table 2 Objective 3.1	Also improve local connectivity between local habitats and designated areas.
35	Table 2 Additional Objective 3.6	Suggested additional objective: Examine the impacts of flood alleviation activities, such as dredging activities, removal of riparian trees considered as flow obstructions etc; and the negative impacts of these channel maintenance and flood management activities on biodiversity.
36	Table 2 Objective 4.1	This is a very important objective and yet 'Resources' are placed as Low. This appears to be a misunderstanding of the implications of using such measures in an urban environment where lands may not be available for natural attenuation features and land availability and therefore cost is very high. The feasibility of nature-based solutions in urban environments is not as great as in the rural context.
37	5.3	Peatlands should form a key component of natural capital accounting, because these areas are very important in Ireland's carbon budget. As an action of the Climate Change Adaptation Plan, it is suggested that an attempt should be made to assign an economic value to Ireland's peatlands, including their capacity to reduce Ireland's GHG emissions (through sequestration), and their capacity to reduce Ireland's GHG emissions (through degradation).
37	Section 5.3	As an action of the Climate Change Adaptation Plan, the potential role of carbon-sequestering habitats (notably peatlands/wetlands and native woodlands) should be highlighted as an option to reduce Ireland's GHG emissions. This may help to attract funding for large-scale peatland-restoration and/or woodland-planting projects.
37	Section 5.5	The Oireachtas is currently debating proposals for carbon taxes in Ireland. The use of carbon tax revenue is currently under debate, with some TDs recommending its use for home-insulation schemes, others for infrastructural projects (e.g. flood-prevention measures) or for other non-specified "climate actions". It is suggested that the Core Team should lobby for carbon-tax revenues to be used for beneficial habitat measures, notably the restoration of degraded peatlands, and the planting of native woodlands. It is suggested, therefore, that this should be added as a separate action of the Climate Change Adaptation Plan.

Page	Heading / Section / Paragraph / Bullet No.	Comment /observation
37	Section 5.5	It is considered that the Core Team should monitor the international policy regarding emissions offsetting and trading, in order to identify opportunities to attract international financing for beneficial habitat measures (e.g. peatland restoration, planting of native woodlands) from others nations that are signatories of the Paris Agreement.
37	Section 5.5	The Core Team could investigate the opportunities for a flagship carbon-offsetting project designed to attract direct investment from international corporations that are seeking to offset their emissions. For example, the Katingan-Mentaya project (http://katinganproject.com/impacts/1/climate) is a private enterprise that attracts donations from international corporations, and uses the funds to restore degraded peatland forests in Indonesia. The project complies with Verified Carbon Standard (VCS), and Climate Community and Biodiversity (CCB) standards. A similar flagship project could be developed in Ireland - e.g. to restore Ireland's degraded raised bogs - and could be marketed towards international corporations with large carbon footprints. Perhaps this could be added as a separate action of the Climate Change Adaptation Plan?
54		The cross-Government Department representation on the working group as shown in the Appendix is essential. Is it possible that something similar to the citizens assembly may be used to gain citizen representation on this group? The citizen assembly process allowed citizens to engage and become informed on issues of national importance, there was good media coverage and the chair delivered the views of the citizens. A similar model might be used as one way to engage citizens in this critical issue of climate change.

C. Responses to specific consultation questions

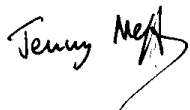
Question	Response
1. Do you have feedback on the Plan overall?	Table 2 provides timeframes of Short term, Medium term and Long term. It is not clear what is meant by these terms. It is suggested that and explanation be provided as to what constitutes Short Term etc in terms of years. Similarly, in respect of Resources. What does this mean? Does it mean labour, funding? What do High, Medium and Low refer to? It is suggested that some explanation / clarification is provided in this regard.

Question	Response
<p>2. Is there information missing that you would like to see included?</p>	<p>In Section 1.1. The description of Ireland’s Biodiversity only addresses habitats and species protected under the EU Habitats Directive, there is no reference to those of national importance or others not included under EU protection. For example, important habitats such as riparian habitats and wetlands not listed as EU habitats that are often overlooked but very relevant to climate change as well as valuable for biodiversity.</p> <p>Similarly, only birds of the EU Birds Directive are included in the summary.</p> <p>How can we address climate change impacts on our biodiversity if a large part of it has been overlooked in the baseline description?</p> <p>It would be important to include habitats and species at least of national if not regional importance to be taken into consideration, rather than just EU importance.</p> <p>We have a very valuable resource for Biodiversity information in the National Biodiversity Database Centre, and should be using that data?</p>
<p>3. Are there case studies or examples you would like to contribute relating to:</p> <ul style="list-style-type: none"> • the impacts of climate change on biodiversity • measures to build the resilience of species and habitats • the impact of adaptation actions (in any sector) on biodiversity 	<p>Existing EPA Climate Change studies provide an extensive resource</p>
<p>4. How would you prioritise the climate impacts identified in the Plan?</p>	<p>n/a</p>
<p>5. Do you agree with the objectives proposed?</p>	<p>Generally, yes, but with the suggestions and caveats set out in the detailed comments above (Section B)</p> <p>Knowing how little funding was provided to LAs last year (first year) of less than €5k, it is questionable whether sufficient funding will be made available for the implementation of the Plan in order to fully achieve its objectives</p>
<p>6. Please provide your feedback on the adaptation actions proposed for each of the objectives, including on who you</p>	

Question	Response
feel the actors should be.	
6 a. Objective 1	<p><i>Please refer to detailed comments above.</i></p> <p>1.1 Does this include all biodiversity or just EU protected habitats and species? Actors: to include the NBDC</p> <p>1.2 It is considered that the enhancement and restoration of riparian habitats should be included, especially as these are so important to Climate Change, Flood resilience and Ecosystem Services.</p> <p>1.3 Also include non-native species used in agricultural diversification, (eg. species grown for biofuel) where the potential impact of rising temperatures on them is unknown, and any naturalisation / spread would be of concern.</p>
6 b. Objective 2	<p><i>Please refer to detailed comments above.</i></p> <p>A suggested additional objective under 2: Improve understanding of the impacts of climate change on biodiversity, could be that we decide to record climate change impacts, note species activities which are unusual, early arrival of migrants etc., invasive species, effects of extreme weather events. This could be done through the NBDC, but agree to/acknowledge this objective as ecological consultants/CIEEM? (Acknowledging data ownership issues).</p>
6 c. Objective 3	<p><i>Please refer to detailed comments above.</i></p> <p>3.1 Also improve local connectivity for local habitats to designations etc.</p> <p>3.6 Suggested additional objective: Examine the impacts of flood alleviation activities, such as dredging activities, removal of riparian trees considered as flow obstructions etc; and the negative impacts of these channel maintenance and flood management activities on biodiversity.</p>
6 d. Objective 4	<p>This is a very important objective and yet 'Resources' are placed as Low.</p> <p>This appears to be a misunderstanding of the implications of using such measures in an urban environment where lands may not be available for natural attenuation features and land availability and therefore cost is very high. The feasibility of nature-based solutions in urban environments is not as great as in the rural context.</p> <p>The over use of green infrastructure in the urban environment for nature-based solutions to various aspects of climate change is putting pressure on wildlife corridors and safe havens for biodiversity.</p> <p>A type of urban squeeze is now becoming apparent where everything is put into the remaining natural corridors including cycleways, attenuation, etc.</p>

Question	Response
6 e. Objective 5	<i>Please refer to detailed comments above.</i>
7. Do you have any other suggestions on how to address the cross-cutting nature of this adaptation plan?	<p>The Plan demands strong leadership and a driving force. A reporting mechanism for each objective would help once the actors know what they need to achieve. They need targets and exact timelines, along with resources.</p> <p>It is suggested that something akin to the Article 17 reporting would mean that everyone knows what is expected and when it will happen.</p>

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. CIEEM is therefore well placed, and willing, to provide input to the Department on this and any further drafts of the Biodiversity Sectoral Climate Adaption Plan.



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