



**Ireland's 4<sup>th</sup> National Biodiversity Action Plan  
(Department of Housing, Local Government and Heritage)**

**9<sup>th</sup> October 2022**

## Introduction to CIEEM

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

CIEEM was established in 1991 and has over 6,000 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:

- Northern Ireland Environment Link
- National Biodiversity Forum (Ireland)
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK

CIEEM has approximately 450 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.

**This response was coordinated by our Ireland Policy Group.**

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at [JasonReeves@cieem.net](mailto:JasonReeves@cieem.net) with any queries.

## **Objective 1: Adopt a Whole of Government, Whole of Society Approach to Biodiversity**

### **Capacity crisis in the professional ecological sector**

In recent years there has been a severe shortage of experienced ecologists, and we are failing to meet the current demands of this rapidly-growing sector. The NBAP and other recent initiatives will further increase the requirement for professionally trained ecologists; this is certainly welcome, but action will be needed to increase the number of ecologists in the future and to train them accordingly. CIEEM has been working to highlight this and the future issues the sector will face due to this capacity shortage. See [here](#) for a more detailed briefing note.

CIEEM welcomes the steps taken in this plan to address some of these issues but would provide the following input:

### **Outcome 1A: Organisational capacity and resources for biodiversity have increased at all levels of Government**

The various actions to address the skills and capacity shortage are welcomed i.e. 1A6, 1A7, 1B4, 3C7, 5A1 and 5A2. However, given the scale of the skills and capacity shortage, in particular for public bodies, Action 1A6 should be expanded and strengthened. The focus of the wording currently is on upskilling and training of existing public servants, but we suggest that it should be expanded to include other methods of increasing and expanding capacity and skills in the public sector, for example hiring new staff or developing a panel of consultant ecologists.

#### **Proposed alternative action text for 1A6:**

“All Departments and Government Bodies will review their requirement for, and access to, biodiversity expertise. Gaps in expertise will be resolved by a combination of acquiring additional staff, developing panels of external ecological resources (e.g. consultants), and providing training to existing staff”.

#### **Proposed alternative indicator text for 1A6:**

“All Departments have sufficient access to biodiversity expertise via full-time staff and / or external resources”.

## **Outcome 1 D: Biodiversity initiative are inspired and supported across the whole of society**

CIEEM would like to highlight the importance of the professional ecological sector in supporting biodiversity projects, initiatives, and activities in Ireland. Due to the capacity crisis CIEEM would like to see outcomes included in this Plan to support the sector which is integral in addressing the biodiversity and climate crisis.

### **CIEEM Proposes the below new Actions to Address the skills and capacity shortage:**

#### **Proposed New Action to address the range and availability of appropriate third level courses in ecology, to address the skills and capacity shortage**

“Review availability of existing third level courses which include biodiversity either as a core or non-core component and identify requirements for new dedicated biodiversity third level courses as well as addition of new biodiversity modules in existing courses e.g. in agriculture, planning, forestry.”

#### **Proposed New Action to create biodiversity apprenticeships to address the skills and capacity shortage**

“Develop and fund a range of biodiversity apprenticeships across the National Framework of Qualifications Level 5 to 9, supported and approved by Quality and Qualifications Ireland.”

#### **Proposed New Action to ensure biodiversity is adequately incorporated into the primary and secondary national curriculum**

“Review how biodiversity is covered in both the primary and secondary school curriculum and amend as required to ensure the curriculum is fit for purpose and focused on addressing the biodiversity crisis. In particular ensure that biodiversity is comprehensively covered in the forthcoming new Leaving Certificate subject on Climate Action and Sustainable Development.”

#### **Proposed New Action to create a 'Jobs for Nature Delivery Group'**

We propose the establishment of a 'Jobs for Nature' delivery group.

There are a wide range of organisations and sectors that are delivering jobs for nature CIEEM would like to see, a ministerial led, cross sectorial group created. This group will take a proactive approach to addressing the future needs and opportunities in the Jobs for Nature sector. It should have the expertise to understand where the sectors that deliver jobs for nature currently are, to assess the emerging policy and future needs and then provide a strategy to close the gap that currently exists by implementing actions that can deliver on sectorial and environmental needs. The Group would act as

a central forum through which government, industry and other key stakeholders work together to ensure that Ireland develops and sustains the effective workforce needed to address the current Biodiversity and Climate emergencies, notably:

- Ensuring we have the skilled workforce to deliver on EU legislative requirements and wider environmental goals;
- Better understanding and addressing barriers to recruitment, retention and progression in the sectors (including quality of work, pay, conditions, image, etc.);
- Ensuring jobs for nature are open to all; and
- Developing a clearer understanding of the sector, the connections between areas such as climate action and biodiversity enhancement, and how to define and measure impact of the sector.

We notice that actions such as 1A6, 3C7 and 5A1 all mention assessing skill needs, however CIEEM would suggest that a wider, more comprehensive approach is needed.

### **Objective 3 Secure Nature's Contribution to People**

While the opening paragraphs of this section of the plan give strong statements about the recognition of the importance of biodiversity, there is a lack of underpinning commitments to significant actions or targets that specifically deliver on this for biodiversity.

We consider the contribution being sought from the planning and development sector to be under-ambitious, limited to a single rather-unambitious target under Outcome 3D.

While many additional commitments could be considered under this objective, two very significant omissions from the Draft NBAP which should be included in this section of the plan are commitments to developing policy approaches for:

- 1. Biodiversity Net Gain;**
- 2. Nature restoration**

Both of these are of particular relevance given the EU's recent commitment to a Nature Restoration Law, and likely recommendations which will emerge in this area very shortly from both the Citizen's Assembly on Biodiversity and COP15.

## Proposed new action to develop a policy around the implementation of Biodiversity Net Gain in Ireland

Biodiversity Net Gain (BNG) is about designing developments in a manner that leaves biodiversity in a better state than before. This is achieved by avoiding impacts on ecological features of high value, minimising unavoidable impacts, enhancing the value of existing features, and providing new ecological features that were not previously present.

BNG is now well established in Britain, Australia, Germany and the USA. In England the Environment Act 2021 made BNG mandatory for all new developments. Scotland and Wales address it under planning policy rather than legislation. There is currently no formal legislation or policy regarding BNG in the Republic Ireland, but some examples of BNG being included in Irish policy, as follows:

- Policy GI16 of the (Draft) Dublin City Development Plan 2022-2028 is *“That new development should provide opportunities to incorporate biodiversity improvements through urban greening and the use of nature based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity.”*
- Policy GINHP14 of the (Draft) Fingal County Development Plan 2023 – 2029 is *“Promote biodiversity net gain in new developments and develop a planning guidance document on Biodiversity Net Gain”*
- Engineers Ireland produced an issues paper in 2021 titled ‘Protecting Biodiversity: The role of Engineers’, which noted that: *“To halt the loss of biodiversity through development, a project should leave the environment in a better state than before. Aiming for Biodiversity Net Gain should form the basis of all engineering projects.”*

CIEEM is aware of developments that are voluntarily incorporating BNG into their projects using British guidance, but we are concerned that British guidance cannot be directly transposed to an Irish context. Therefore, there is a pressing need for BNG guidance in Ireland, which would give a clear policy base and standardised approach for all future assessments.

The CIEEM Ireland Policy Group has recently undertaken a review of Biodiversity Net Gain in Britain and proposed a suitable model for the Republic of Ireland and Northern Ireland. We do not recommend the use of biodiversity metrics (a mathematical model for comparing biodiversity units before and after development), because biodiversity is inherently complex, and any attempts to categorise or score it will involve a range of assumptions and decisions that are open to critique.

Instead, we favour a qualitative approach based on the expert judgement of suitably qualified ecologists. Our guidance note includes the following considerations:

- What form should BNG take in Ireland?
- How should it be incorporated into other reports, e.g. Environmental Impact Assessments
- What habitats should be considered 'irreplaceable' in Ireland?
- Should BNG be mandatory for all developments?
- Should ex-situ offsetting be considered?
- Appropriate timescales for implementation and monitoring
- Suggestions for biodiversity enhancements

### Proposed new action to investigate and establish nature-based carbon-offsetting projects for individuals / businesses

BNG cannot always be achieved within a development site, in which case impacts can be offset outside the development site. In England this is typically achieved by making a financial contribution to a biodiversity enhancement project in the surrounding area. A regulatory system has been developed for this process, whereby offsite lands used for BNG must be registered on a biodiversity gain register (subject to a specific planning permission), measured using a standardised biodiversity metric and legally secured for at least 30 years. Some sites are managed by local authorities, and others are managed by commercial operations.

In principle we support this approach, as it increases the quantity and quality of land available for biodiversity. However, this system can only operate reliably when there is a system to coordinate and account for the management of these areas, and that does not currently exist in Ireland. Local authorities and the National Parks and Wildlife Service are unlikely to have the resources to coordinate or manage offsetting areas.

Therefore, an action should be included in the NBAP to develop an Irish approach for ex-situ biodiversity compensation for development projects. It should address the recognition and regulation of these sites / projects, a system to calculate appropriate financial contributions, and appropriate long-term monitoring and reporting to ensure their effectiveness.

### Proposed new action to investigate and establish nature-based carbon-offsetting projects for individuals / businesses

We also recommend that the NBAP considers opportunities for individuals or businesses to financially contribute to habitat restoration projects as a means to offset carbon emissions. For example, a large-scale peatland-restoration or afforestation project could be funded by private sector businesses that wish to offset their carbon emissions. Similarly, individuals may wish to contribute to these projects as a means to offset air travel or other aspects of their carbon footprint.

Nature-based restoration projects require support and regulation from government. Frameworks for these processes have been developed by international bodies, e.g. the [woodland carbon code](#) and [peatland carbon code](#). For a trustworthy, verified initiative to be created, these standards would need to be adapted to an Irish context, using robust research and independent establishment oversight. CIEEM would like to see an action included in the plan that will support this opportunity.

### Proposed new action to develop a policy around nature restoration

The EU has recently committed to introducing a Nature Restoration Law. CIEEM would like to see this recognised in the Action Plan with the addition of an action to develop a policy around nature restoration. This would also support Irelands commitment to protect at least 30% of the worlds land and ocean by 2030 which was announced at COP 15 this year. [30x30 petition](#)

### Proposed new action to develop a Biodiversity Checklist for planning

The Northern Ireland Environment Agency has developed a Biodiversity Checklist for development projects in Northern Ireland, which is used by local-authority planners and private-sector developers to identify appropriate ecological assessments for development projects. For example, it lists the circumstances in which a bat survey should be undertaken as part of a planning application. See [here](#) for more information.

We feel that a similar resource in the Republic of Ireland would help to provide clarity for planners and developers in Ireland. It would help local-authority planners to identify appropriate surveys, and reduce inefficiencies, e.g. time lost to requests for further information. We would like the NBAP to include an action to develop a Biodiversity Checklist or another form of biodiversity guidance for planners and developers.

Summary of CIEEM proposed new actions to be included in the 4<sup>th</sup> National Biodiversity Action

Plan:

1	Alternative action text for 1A6: "All Departments have sufficient access to biodiversity expertise via full-time staff and / or external resources"
2	Address the range and availability of appropriate third level courses in ecology, to address the skills and capacity shortage
3	Create biodiversity apprenticeships to address the skills and capacity shortage
4	Ensure biodiversity is adequately incorporated into the primary and secondary national curriculum
5	Create a 'Jobs for Nature Delivery Group'
6	Develop a policy around the implementation of Biodiversity Net Gain in Ireland
7	Investigate and establish projects for ex-situ compensation of development projects
8	Investigate and establish nature-based carbon-offsetting projects for individuals / businesses
9	Develop a policy around nature restoration
10	Develop a Biodiversity Checklist or similar biodiversity guidance for planners and developers