



**Chartered
Institute of
Ecology and
Environmental
Management**

**NPWS Public Consultation
Draft Strategy Statement 2023-2025
Dec 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 7,000 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 practicing 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 with any queries.

Summary of CIEEM's key comments

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| 1 | NPWS Commitment to have a proactive willingness to provide transparent, clear and consistent advice to users of the NPWS services. |
| 2 | NPWS taking a proactive approach to providing guidance, highlighting best practice, and taking positions on the ever-changing ecological landscape. |
| 3 | Inclusion of Nature Restoration activities in the Core Goals of the NPWS. |
| 4 | Review of the NPWS policy on data sharing. |
| 5 | Time scale and commitment given to the creation of Management plans and site-specific conservation objectives for all Natura 2000 sites by the NPWS. |
| 6 | Commitment to review pNHA's and provide statutory protection, management plans and conservation objectives. |
| 7 | NPWS are proactive in ensuring that current advice and guidance is complying with EU and national law. |
| 8 | That there is clear communication of licensing processes that is made available and easily accessible for all. |
| 9 | NPWS to provide detailed guidance to planning authorities on the matters that should be addressed in planning applications. |
| 10 | Urgent guidance is needed to develop a framework for Biodiversity Net Gain in Ireland. |
| 11 | That the NPWS undertakes a review of the DAU and works towards a more efficient and transparent system. |
| 12 | Resources committed to building awareness of wildlife crime and to prevention measures. |
| 13 | The NPWS engages with addressing the capacity crisis both internally and externally, as suggested below. |

See below detailed responses to some of the questions posed in the consultation document:

Question 1: What do you think should be the core Mission of the National Parks and Wildlife Service?

The core mission of the National Parks and Wildlife Service should be to protect, restore and enhance biodiversity in Ireland to the point where the trend in biodiversity loss is reversed. As well as through the legislative and formal functions of NPWS, this should be achieved through promotion of biodiversity value, monitoring and appropriate protection, restoration and enhancement measures to the public, professional practitioners, and state agencies.

CIEEM would suggest the inclusion of a strong vision and purpose for the organisation. We believe the addition of these in the plan would give an opportunity to create a longer-term vision and ambition for the organisation as well as a more practical overall purpose, that will help connect all directorates. We advise the NPWS to look at the [EPA Strategic Plan 2022 - 2026](#) as an excellent example from another public sector organisation with a remit in the same environmental space.

Question 2: What core values do you think the NPWS should be guided by?

CIEEM welcomes the core value of *“A renewed commitment to customer focus, to transparency and accountability in our decision-making, to teamwork and mutual respect.”*

CIEEM sees standardising communications from the organisation and showing a proactive willingness to provide transparent, clear and consistent advice to users of the NPWS services as an essential consideration for this strategy. For example, this means engaging with farmers whose land is designated for nature conservation, or with companies or individuals making planning applications that may affect designated sites or protected wildlife. We touch on this in further questions but a key aspect of this is ensuring open and consistent communication across directorates.

Question 3: Are these the right Strategic Goals and areas of focus for NPWS - is there anything missing?

CIEEM agrees with the goals outlined in the consultation document in particular ‘...customer-centric guidance, advice, support and enforcement.’

CIEEM would like to see NPWS taking a proactive approach to providing guidance, highlighting best practice and taking positions on the ever-changing ecological landscape. This has previously relied on professionals and developers navigating and leading actions in the sector, this is not to the benefit of our natural environments. We have also relied greatly on guidance from the UK, e.g., survey guidance for windfarms produced by Scottish Natural Heritage. We consider it to be the role of the NPWS to provide an independent and leading voice in the sector, and CIEEM would like to see this made a priority in this plan.

CIEEM would like to see the Natura 2000 sites and Natural Heritage Areas being included in the goal “*To maintain excellence in the operation and management of Ireland's National Parks and Nature Reserves*”. In particular, a commitment to manage the current protected areas so that there are management plans and site-specific conservation objectives adopted for each site. We note that 630 proposed Natural Heritage Areas were published on a non-statutory basis in 1995, but that they have never been given any statutory protection.

CIEEM noted there was no mention of nature restoration and delivery of improvements for nature in the Core Goals of NPWS. CIEEM believes this should sit under the NPWS and would like to see it included in this section.

Scientific Advice and Research

Provision of scientific advice and evidence; centralised function for applied research and analysis within NPWS. Led by Chief Scientific Advisor on Nature and Biodiversity. (Director: Andy Bleasdale)

Question 6: What 3-5 major objectives do you think the NPWS should set in terms of Scientific Advice and Research over the next 3 years?

1. CIEEM thinks a priority of the NPWS should be to review its policy on data sharing.

We would like to see the extensive data of the NPWS made more accessible and useful to others working for the protection of nature. For example, making datasets available as raw data and not pdfs.

2. CIEEM thinks that a priority of the NPWS should be to provide and promote best practice approaches and guidance for ecological surveying, monitoring and assessment

We believe that some imperatives, such as achievement of renewable energy targets, will put significant pressure on consenting timelines for such projects. Pressure for a lighter touch consenting

process should be resisted (where it has the potential to result in reduced ecological assessment). Rather, robust guidelines and advice from NPWS should be provided on expected approaches and minimum standards for surveys and assessment, thereby reducing the potential for challenge to decisions. NPWS should be the agency to push this agenda.

3. CIEEM thinks that a priority of the NPWS should be to take a leading role on addressing the Capacity crisis that is affecting the sector at a time when capacity should be increasing.

We have identified a capacity crisis within the industry (see [here](#)). This crisis, and the effect it is having on decision making, including the project consenting process in Ireland, has been identified back to us by several stakeholder agencies and sectors in Ireland. We have attempted to engage with Government on an approach to tackle this issue, but it is clear that it needs a coordinated approach that can reach into different sectors of Government and into different opportunity and funding streams. NPWS is ideally placed to take the lead on this crucial, and time-sensitive issue.

Nature Conservation

Conservation measures and incentives at Natura sites, peatlands conservation and restoration, EU Measures, implementation of Reform programme for NPWS, Waterways Ireland and Shared Island/ North-South projects. (Director: Ciara Carberry)

Question 7: Looking at the headline functions above, what are the biggest challenges that you think will face the NPWS in terms of Nature Conservation over the next 3 years?

CIEEM recognises the excellent work that is being undertaken by life projects and other European Innovation Projects (EIP). This is welcome; however, we would recommend that a more strategic view be taken for these projects, with spending of funds perhaps offering better value for money by employing internal positions to undertake work on these projects, rather than outsourcing much of it to consultants or sub-contractors.

Question 9: What 3-5 major objectives do you think the NPWS should set in terms of Nature Conservation over the next 3 years?

1. We would like to see a time scale and commitment given to the creation of management plans and site-specific conservation objectives for each Natura 2000 site. CIEEM would like to see this as the first priority of this team.

2. In 1995 630 sites were proposed for Natural Heritage Area status. These sites were thought to be of significance for wildlife and habitats but since then many have had no statutory protection. CIEEM would like to see these pNHA's reviewed and given statutory protection and management plans. After almost 30 years this should be a priority.
3. At present many nature restoration projects in Ireland are funded from public budgets. However, there are considerable opportunities for private sector funding of nature conservation (e.g. peatland restoration or afforestation), either from individuals / businesses that wish to offset carbon emissions (e.g. from air travel), or for development projects to compensate for ecological damage by enhancing nature areas nearby. These projects require support and regulation from the 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.

Legislation and Licensing

Ecological assessments, Licensing (wildlife), Legislation including Wildlife Acts, co-ordination of judicial review cases. (Director: Sorcha de Brúch)

Question 15: What 3-5 major objectives do you think the NPWS should set in terms of Legislation and Licensing over the next 3 years?

1. We would like NPWS to provide detailed guidance to planning authorities on the matters that should be addressed in planning applications, e.g. guidance on when a bat survey should be carried out. The Northern Ireland Environment Agency has produced a Biodiversity Checklist that is completed for all planning applications; similar guidance should be provided in the Republic of Ireland. We also recommend that Preliminary Ecological Appraisal (effectively a broad-scale ecological screening assessment) is promoted as standard practice for developments of a suitable scale.
2. Biodiversity Net Gain will soon become a legal requirement in England, while Scotland and Wales have produced public guidance on the matter. In the absence of Irish guidance some projects are starting to use the English approach (based on habitat metrics), but this has not been adapted for an Irish context. Urgent guidance is needed to develop a framework for Biodiversity Net Gain in Ireland, in order to ensure common standards.

3. CIEEM would like to see a priority given to providing clear and consistent advice and guidance in areas of compliance with EU and national law. As an example, we would like to see the NPWS providing guidance on developments in case law regarding Appropriate Assessment and other ecological issues - there is a notable lack of public engagement on these matters.
4. The Wildlife Act and EC (Birds and Natural Habitats) Regulations have been amended on several occasions, but it is very difficult to find or keep track of these changes. The NPWS should provide consolidated versions of this legislation to ensure that the latest, amended text can easily be found
5. Clear communication of licensing processes needs to be made available and easily accessible for all. We believe that having a clear process with ample details available to view on the NPWS website would increase efficiency within the organisation.

We understand that even fully staffed, it would not be possible to fully engage with all requests submitted to the Development Applications Unit (DAU), however we believe there are improvements that could be made. Resources should be spent on priority areas and projects but at the very least guidance needs to be available to support all projects. Some smaller projects can still have tricky aspects and support and advice should be available. Standardising the processes and guidance for Ecological Assessment in Ireland and making this guidance clearly available and understandable will reduce queries and time needed to deal with smaller and simpler projects.

Wildlife Enforcement and Nature Protection

Wildlife Crime, safeguarding and protection of designated habitats and species.

(Director: Suzanne Nally)

Question 18: What 3-5 major objectives do you think the NPWS should set in terms of Wildlife Enforcement and Nature Protection over the next 3 years?

CIEEM recognises that in the past there have not been resources to address wildlife crime sufficiently. We are aware of a wildlife crime unit being established but as of yet is not fully staffed. We would call for this to be resourced and given the consideration needed to improve activity in this area. As an example, the EPA has hotlines and clear processes to report issues however they also undertake activities to reduce instances of crime by producing education resources, building awareness and emphasising prevention measures (e.g. awareness campaigns to avoid accidental damage). We would like to see similar consideration and resources given to this area.

Engagement and Corporate

Stakeholder engagement, Communications, HR, Legal advice and Corporate Functions.

Question 20: What do you think are the best ways for the NPWS to reach those audiences?

Currently, having connections within the organisation increases a person's likelihood of getting responses, engagement, and support from the organisation. This does not provide fair, transparent, or equal access to services from the national body with responsibility or nature conservation. We would like NPWS to prioritise the creation of fair, transparent, and equal access for all users to avail of their services.

Question 22: Do you have any other observations that you would like us to take into account when forming our Strategy for the next 3 years?

CIEEM understands this is a scoping activity and we welcome the opportunity to input at this time. However, we believe that this strategic plan has the scope to be a more ambitious and longer-term plan. We note the short timeframe covered by this plan and suggest this is extended or an ongoing commitment to review and measure progress should be included. There should also be included a section on how the organisation will progress if actions are not achieved in the plan timeframe and commitment to making the necessary adaptations in order to see the action achieved. Overall, we feel the nature of the organisation and its remit deserves a longer term and more ambitious strategic plan.

Regarding the NPWS Organisational Structure we have the following comment:

CIEEM recognises the wide range of activities that the NPWS undertakes and acknowledge that creating effective structures is challenging, however we would like to highlight that a number of the directorates' activities will overlap, and that having strong organisation wide messaging will ensure that each team can work in their areas but work as a cohesive whole organisation.

Areas that are in different directorates that might need strong ties are:

- Licencing and Wildlife Enforcement,
- Legislation and Nature Protection
- National Parks and Nature Reserves and Nature Conservation.

If the directorates are siloed it will cause problems in the effective and efficient running of the organisation.

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. 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.

Professionally trained ecologists will be needed to implement this strategy and to build the necessary capacity and expertise needed. Below we have made some comments on what the NPWS can do to improve the situation within the organisation:

- The NPWS should focus on increasing organisational capacity with additional permanent or short-term posts for ecologists a preference over outsourcing to consultants or sub-contractors; we feel this will offer better value for money and create better capacity in the sector long term
- Offer competitive packages to attract applications. Currently the NPWS is not competing with the market on salaries, even within other similar public sector organisations.
- Use a recruiting model that is suitable for the specialist sector we work in. The NPWS should consider a more effective process to fill positions and establish a recruiting model that focuses on career and talent development suitable for specialist roles. This is not only relevant to the scientific department but also licensing and other areas.

In addition to this CIEEM would like to see the NPWS strategy include activities to build capacity in the sector. This will only benefit the organisation and the achievement of its overall mission.

- **Support professional membership organisations.**
There needs to be a recognition of ecology as a distinct and valued profession. Supporting the work and value of professional membership bodies will raise the standard of the sector but also help reduce the pressure of oversight activities of the NPWS.
- **Create internship opportunities within the NPWS.**
There are examples of ways this can be done within the public service. For example, the Marine Institute has had a very successful bursary programme as well as a 1 year paid internship program that the NPWS could emulate.
- **Engage with Higher Education Institutes** to address the skill gaps that exist in the sector.

- **Engage with other departments** to create other opportunities for the sector, for example support the creation of an apprenticeship for the sector.