



CIEEM

BNG in the Island of Ireland

Survey results report

AUGUST 2025

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Executive Summary

Following publication of the updated [Biodiversity Net Gain in Ireland](#) briefing paper, CIEEM launched a survey (open from November 2024 to early-January 2025) to gather views on whether Biodiversity Net Gain (BNG) should be put into practice in Ireland and, if so, how. This report presents the results of that survey and does not represent a CIEEM position on the subject. These results alongside additional stakeholder engagement will inform a CIEEM position paper which is in the process of being developed by [CIEEM's Ireland Policy Group](#).

A total of 133 individuals responded to the survey, primarily from the Republic of Ireland (75%), with the remainder working in Northern Ireland (7%), both regions (10%), or outside Ireland (7%). Over half work in consultancy; others represent public bodies, government, industry, academia, NGOs, or other sectors. Most (85%) have ecological sector experience, with nearly half working in the field for over a decade.

Current BNG activities in Ireland

The survey reveals that there is increasing engagement with, and preparatory work for, BNG in Ireland. Activities include BNG assessments, policy development, and compliance-driven projects. About 60% of respondents' organisations conduct some form of BNG assessment, involving both qualitative and quantitative approaches.

Many respondents are involved in developing internal policies, researching BNG methodologies, or monitoring evolving requirements. Compliance with planning policy (e.g., County Development Plans) is a frequent driver, as are client requests and obligations under EU sustainability directives like the Corporate Sustainability Reporting Directive (CSRD) and Sustainable Finance Disclosure Regulations (SFDR).

Drivers for BNG

The survey results highlight drivers— some already present, and some only potential or emerging — for the emergence and expansion of Biodiversity Net Gain (BNG) across Ireland:

- **Internal organisational value:** Many organisations want to lead in biodiversity enhancement or prepare for likely future regulation.

- **Client and compliance demand:** Some clients are already seeking BNG work, especially for regulatory and reporting purposes.
- **Policy trends abroad:** Developments like England's legal BNG requirements are shaping expectations in Ireland, though lessons and pitfalls from overseas generate mixed opinions.
- **Future strategies:** Respondents see potential for BNG to dovetail with wider ecosystem restoration ambitions and national strategies.

Barriers for BNG

Barriers to the implementation and expansion of Biodiversity Net Gain (BNG) across Ireland also emerged from the survey:

- **Legal and policy vacuums:** The absence of legal mandates or coordinated national strategy is widely viewed as a significant hindrance, creating inconsistency and risk.
- **Unclear standards and definitions:** Without shared standards, there are disparities in BNG practice, causing confusion among practitioners and stakeholders.
- **Skills and capacity deficits:** There is a shortfall of ecological expertise, particularly within local authorities and developers, undermining implementation and monitoring.
- **Enforcement and training gaps:** Limited resources to enforce compliance and a lack of standardised training are cited as critical weaknesses.
- **Stakeholder resistance:** Some actors – including developers and consultants – are seen as resisting BNG due to perceived costs, technical complexity, and scepticism about its ecological effectiveness, some citing negative experiences in England.
- **Limited data:** Inadequate baseline ecological data impedes setting measurable goals and assessing progress, with concerns that critical habitats and species might not be appropriately protected and benefit from BNG as a result.

Attitudes towards policy change

A significant majority (80%) of respondents support replacing the existing “No Net Loss” approach with formal BNG requirements. As described above, many stakeholders — including local authorities, consultants, developers, and ecologists — are engaged with BNG either directly or prospectively.

Preferred forms of BNG implementation

Among those who supported a transition to BNG, several preferences and recommendations regarding how BNG should be implemented in Ireland emerged from the survey results and are summarised below:

- **Mandatory requirement:** A significant number of respondents believe BNG should be mandatory, at least for large and medium-scale developments.
- **Hybrid assessment approach:** 75% favour approaches that combine quantitative metrics with expert qualitative judgment, balancing consistency with ecological nuance.
- **Phased introduction:** Some recommend starting with BNG as non-binding policy or guidance, followed by legal mandates to build sector readiness.
- **Local flexibility, national consistency:** While national consistency were frequently referred to as critical, respondents also want local authorities to be able to adapt delivery to specific regional needs.
- **Broad sectoral application:** many considered that BNG should cover most developments, with limited exceptions (e.g., very small projects or national strategic infrastructure).

Recurring themes

Throughout the survey, several themes emerged repeatedly:

- **Call for a national multi-sector strategy:** There were repeated calls for a national, multi-sector strategy for BNG in Ireland,

as the current absence is widely seen as a significant risk. The strategy should be coordinated at the national level, involving all sectors and levels of government, from state departments to local authorities. Many also advocate for making BNG a mandatory part of County Development Plans.

- **Mitigation hierarchy:** Many respondents view the industry standard for minimising biodiversity and ecosystem impacts as essential to reducing BNG risks, and stressed that guidance should emphasise the use and application of the mitigation hierarchy. Providing well-evidenced mitigation options was also frequently recommended for BNG training.
- **Collaboration:** Respondents highlighted the need for collaboration between ecologists, developers, and planners—especially in creating national guidance—to support a multi-sector strategy. Involving these key groups early in the process of co-design is seen as essential for effective implementation of BNG, even as policy and guidance evolve over time.
- **Resource needs:** Enhanced resources — both expertise and financial support — were highlighted as a persistent need, especially for local authorities tasked with oversight and enforcement of planning conditions.
- **Alignment with broader restoration efforts:** Many see an opportunity to link BNG with wider landscape and ecosystem restoration programmes, provided there is sufficient geographical connection to development sites.



Survey Report

The respondents

In total, 133 individuals responded to all or part of the survey: 75% were based in and/or worked in the Republic of Ireland (ROI); 10% in both ROI and Northern Ireland (NI); 7% in NI; and, 7% from outside of the Island of Ireland. In terms of sector worked in, 52% were in consultancy; 15% in public bodies; 15% in local or national government; 7% in industry; 3% in academia; 3% in Non-Governmental Organisations; and, 4% from other, including semi-state bodies, forestry, and construction.

85% of respondents said that they worked, or have worked, in the ecological sector; and, almost 50% had been in the sector for more than 10 years.

Respondents were split approximately in half between CIEEM members and non-members. Of those respondents who were CIEEM members, most were full members.

Other sectors referenced by respondents in relation to their professional backgrounds were: planning policy, architect (including landscape architect), student or early-career ecologist, hydrologist, landowner engagement and land acquisition, environmental science & engineering, environmental economics, windfarm development & construction.

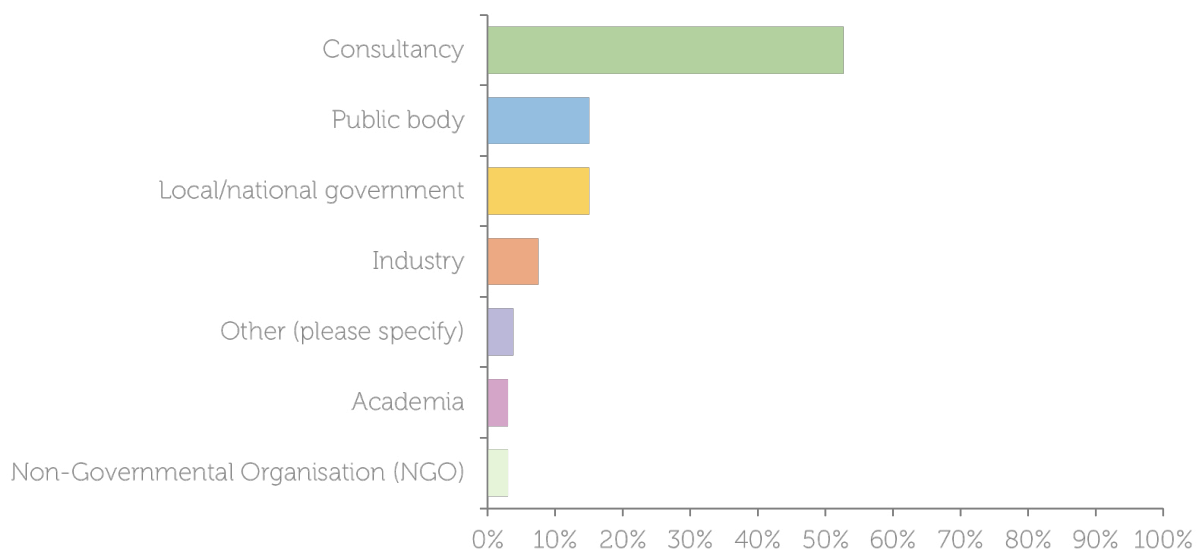


Figure 1: Employment sector of respondents

Current Biodiversity Net Gain activity

More than half of respondents are currently engaged in Biodiversity Net Gain activities, including: carrying out BNG assessments (48%); developing BNG methods (35%); reviewing BNG assessments (25%); commissioning BNG assessments (18%); and supervising BNG assessments (18%).

28% said they were engaged in other BNG-related activity, which can be summarised as:

- ☐ Researching new or exploring existing BNG methodologies
- ☐ Writing BNG policy and guidance
- ☐ Internally adopted BNG policy in some form
- ☐ Advocating for, or supporting others in relation to, BNG
- ☐ Internally motivated to explore BNG as a precaution or an organisational priority

- ☐ Not directly involved in BNG activities in Ireland, but have an interest in being involved in its development
- ☐ Have a general interest in BNG
- ☐ Focused on complying with legal obligations which do not currently include BNG
- ☐ Undertaking or encouraging activities that contribute to biodiversity enhancement or mitigation, but are not formally “BNG”
- ☐ Experience of DEFRA’s BNG methodology
- ☐ Being asked by clients to implement BNG

Around 80% of those not currently engaged in BNG activities said they expect to be in the next few years. The remainder indicated a more general interest in BNG, including those wishing to observe what is happening in Ireland from outside of those countries.

Organisational BNG activity

Approximately 60% of respondents said that their organisation was currently carrying out BNG

assessments (either qualitative, quantitative, or hybrid). About 19% said their organisation was not currently involved in in this BNG activity, and almost 12% said “other”; comments indicated that these other activities were much the same as those listed above. Just over 5% said they were “Unsure”.

When asked which approach to BNG their organisation used, the largest proportion, approximately (44%), indicated they use a “Hybrid” approach that combines both metrics and professional judgement. Around 14% each reported using a “Quantitative” approach (relying on numeric metrics), a “Qualitative” approach (based on professional judgement), or selected “Other” and provided additional details in the comment; these were broadly similar to activities given in answer to question 10 (summarised above).

Almost half (47%) of respondents said their organisation were carrying out BNG activities to comply with planning policy (e.g. a County Development Plan). A slightly smaller proportion of respondents (40%) said it BNG had been requested by clients. 26% said it was to provide information for Corporate Sustainability Reporting

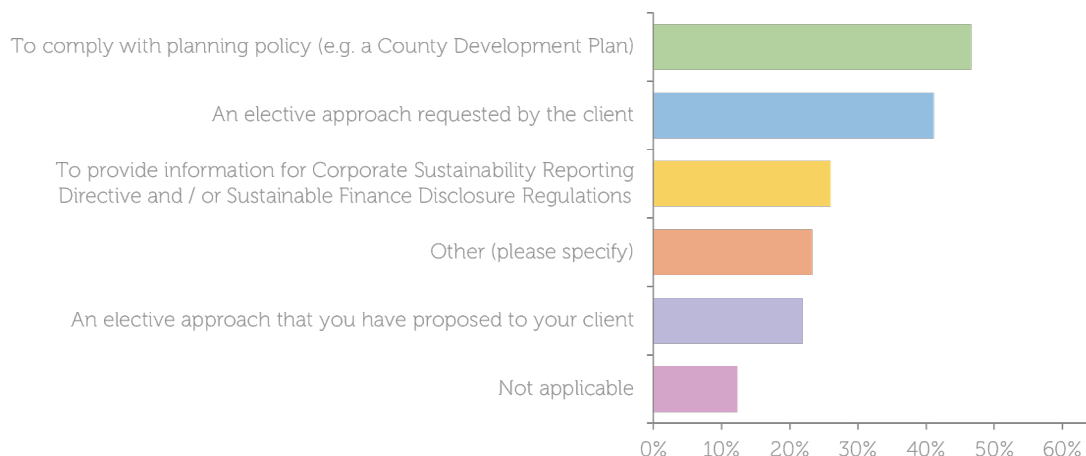


Figure 2: Reasons for organisational engagement in Biodiversity Net Gain Activities

Directive and / or Sustainable Finance Disclosure Regulations, and 21% said that they had proposed it to clients. 23% said, “Other”; again, these were broadly similar to activities given in answer to question 10.

The largest proportion of respondents (37%) reported that few of their clients (less than a third) are asking for BNG; 7% said that many of their clients (around half) are requesting BNG; and a small proportion, 5%, said that most of their clients (more than two thirds) are asking for BNG. The remainder said that this question was “Not applicable”.

Views on Biodiversity Net Gain

How ambitious is current No Net Loss (NNL) policy?

Around 60% of respondents said NNL was “unambitious” to some degree.

Comments indicated widespread concern that Ireland is facing a biodiversity crisis, and that current policy is not sufficiently ambitious to address the urgency of the situation. Respondents expressed disappointment that the policy remains unchanged from the previous National Biodiversity Action Plan (NBAP) and will continue in its current form until 2030, despite growing environmental challenges. Particular criticism directed at the use of the phrase “to move towards” in the NBAP, which is seen as enabling both public and private sectors to avoid taking meaningful action. Notably, many respondents observed that a range of stakeholders—including public bodies, local authorities, and developers—are already exceeding the NNL standard, highlighting a disconnect between policy requirements and on-the-ground efforts to protect biodiversity.

Several respondents were of the view that without making Biodiversity Net Gain (BNG) a legal obligation, it is unlikely to deliver any tangible benefits for nature in Ireland. Some said that local authorities should be required to include BNG as a core objective within their County Development Plans (CDP), ensuring its application across all projects and developments. It was apparent from the responses that several local authorities are already included in BNG in their CDPs.

Conversely, 40% said NNL was “ambitious” to some degree. The comments indicate that many consider

NNL is appropriate in the current circumstances citing several ongoing challenges to implementing biodiversity enhancement relating to:

- ☐ **Policy and guidance:** Lack of national policy, guidance, and government leadership.
- ☐ **Capacity and skills:** Insufficient ecologists and expertise in local authorities and industry.
- ☐ **Resistance:** Difficulty changing mindsets among developers, architects, and consultants.
- ☐ **Implementation and enforcement:** System inefficiencies, lack of enforcement, and practical monitoring challenges.
- ☐ **Economic and political factors:** Cost pressures, limited political will, and lagging public/ecological awareness.
- ☐ **Technical difficulties:** Complexity in quantifying biodiversity outcomes and insufficient offsetting mechanisms.
- ☐ **Sector-specific barriers:** Significant challenges in forestry and lack of land for effective offsetting.

Should no net loss (NNL) policy be replaced by BNG?

Just over 80% said BNG should replace NNL, with many citing the same reasons they gave for considering NNL to be insufficiently ambitious.

Around 10% said that they were “unsure”. Comments revealed uncertainty regarding both the achievability and necessity of BNG in Ireland. Others said they considered that the distinction between NNL and BNG is often subtle and either may be achievable.

Around 8% said “no” to replacement of NNL with BNG. Some of the scepticism expressed in the comments also referenced criticism of BNG in England as overcomplicated, expensive, and ineffective at delivering meaningful benefits for nature. Another respondent questioned the creation of additional obligations without clear, quantifiable benefits, especially if those benefits are likely to be overshadowed by larger environmental shifts from global climate change. There was also a note of caution against pursuing BNG at the risk

of slowing, preventing, or discouraging necessary development.

Potential outcomes from

Biodiversity Net Gain?

A majority of respondents (90%) thought that BNG would encourage developers to do more for biodiversity, and 85% said it would drive higher standards for biodiversity protection in planning applications. Many also agreed that BNG would encourage more cross-disciplinary engagement between ecologists and other professions (74%), and that it would raise public awareness of the effects of development on biodiversity (53%).

Some respondents identified additional potential outcomes of Biodiversity Net Gain (BNG), including that BNG would create incentive for developers to avoid negative impacts on nature by internalising the cost to nature; potential interconnection of BNG with other legislation and policy, enabling the delivery of multiple benefits beyond biodiversity alone; potential for BNG to assist developers in meeting other regulatory obligations, thereby streamlining compliance; and the prospect that BNG could drive better data capture on the status of biodiversity across the country, which would inform future conservation and planning efforts.

Barriers to implementation of BNG in Ireland

Asked about the current status of BNG in Ireland, a majority of respondents agreed that the lack of national guidance on BNG was a concern (85%); 74% were concerned that developers were not implementing BNG because they are not required to; 65% said there was a lack of consensus on what constituted a net gain; 65% said there was a disparity of different methods and outcomes; 58% were concerned about long-term maintenance of gains; and 27% think that there is a risk of third-party legal challenges to planning applications. Some respondents offered other sources of concern, including: a lack of interest and experience among developers and consultants, insufficient skillsets and capacity within the sector, and the absence of robust monitoring and enforcement mechanisms.

What approach to BNG should Ireland take?

Just over half of respondent were in favour of an all-Ireland approach; around 20% were “unsure”; just over 20% said “other”; and around 7% said “no”.

Of those that were in favour of an all-Ireland approach, several commented that any strategy for nature recovery, including BNG, should be geographically cohesive across both Northern Ireland and the Republic of Ireland, with one respondent noting that biodiversity gains or losses on one side of the border will affect the other. Another respondent said that a unified, all-Ireland approach would simplify the work of consultants and ecologists engaged in cross-border or island-wide projects by providing a standardised framework for implementation.

Among those that said “unsure” or “other”, there was broad support for the principle of an all-Ireland approach to BNG, but respondents repeatedly highlight the substantial practical, legislative, and political barriers to immediate implementation. A few respondents said they could see value in shared standards or metrics between the two nations, while another suggested approaches may gradually align as they develop, allowing for comparability and cooperation without requiring a single shared approach at the outset.

Most respondents favoured a national approach to BNG, either through policy (42%) or legislation (34%). Around 10% thought the approach to BNG should be determined by the local authority; around 7% said they were “unsure”.

Around 6% said “other” and gave the following comments (summarised):

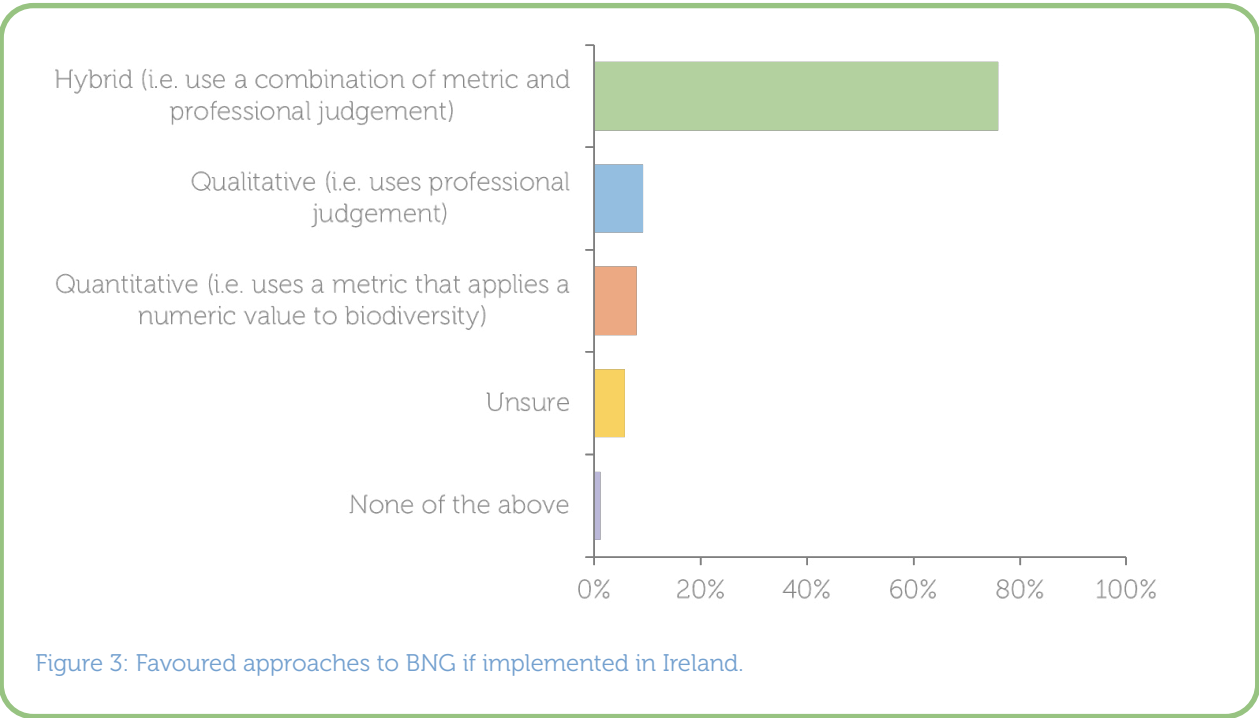
- ☐ **National framework:** Overarching national policy/guidance is essential for consistency.
- ☐ **Local flexibility:** Local authorities should deliver BNG to reflect local needs.
- ☐ **Ireland-specific guidance:** Clear guidance is needed, with an approach specific to Ireland.
- ☐ **Legislation with guidance:** National legislation should be the ultimate goal, supported by clear guidance and policy.
- ☐ **Phased implementation:** Start with policy/guidance, then move to legislation to avoid delays in adoption.
- ☐ **Implementation beyond planning:** BNG should apply beyond the planning system (e.g., agriculture, exempt works).

A majority of respondents (75%) favoured a hybrid approach to BNG. While limitations to both qualitative and quantitative methods were cited in the comments, many said that a hybrid approach to BNG in Ireland could leverage the strengths of both quantitative metrics and qualitative professional judgment. This approach is seen as necessary to ensure clarity, measurability, and consistency, while also accommodating the complexity and nuance of real-world biodiversity. However, effective implementation of a hybrid approach will require clear guidance, robust oversight, and a holistic, ecosystem-based perspective.

Almost 10% favoured a quantitative, or metric-based, approach. Based on the comments, it appears that this

is in part because a qualitative approach already exists in DEFRA's BNG metric which is currently mandatory for development in England. Several respondents were of the view that this or other approaches already in existence should be adapted for use in Ireland. It should be noted that elsewhere, some respondents voiced opposition to using or adapting the DEFRA metric.

Among the 6% who said they were "unsure", comments indicate some support for a hybrid approach, but respondents wanted more detail, clearer guidance, and evidence that any chosen approach will deliver genuine biodiversity benefits, not just tick-box outcomes. The need for careful design, robust oversight, and continuous evaluation of any approach is repeatedly emphasised.



Most respondents considered “Biodiversity Net Gain” to be an appropriate term for use in Ireland, though several alternatives were proposed, including: “Biodiversity Enhancement”, “Environmental Gain”, “Net Benefits for Biodiversity”, “Nature and Development Unifying Requirement (NADUR)”, “Biodiversity Enhancement through Development (BED)”, “Biodiversity Net Improvement”, “Habitat Net Gain”, “Positive biodiversity outcomes”, “Compensation and Enhancement Measures”, “Biodiversity Accounting”, and “Biodiversity Improvement in Ireland”.

Different Biodiversity Net Gain approaches

Quantitative (or a metric-based) approach: benefits and challenges

Based on the comments, a quantitative approach to BNG is valued for its ability to facilitate comparison, communication, and clarity. A perception that a quantitative approach would primarily focus on habitats and not consider species is likely a reflection of a criticism of DEFRA’s BNG metric. However, advocates for a quantitative approach were of the view that experienced practitioners can interpret these metrics to infer wider ecological value, while recognising that it may not capture all ecological complexities or directly address every species or ecological feature.

Qualitative (or professional judgement) approach: benefits and challenges

Several comments reference the importance of a qualitative or professional judgement-based approach to BNG for capturing ecological complexity and site-specific value. However, its effectiveness was said to be highly dependent on the expertise of individual ecologists and is considered harder to enforce and standardise. There were suggestions that qualitative and quantitative approaches should be combined (i.e. a hybrid approach), leveraging the strengths of both to ensure robust, nuanced, and meaningful biodiversity outcomes.

Hybrid (combination of metric and professional judgement) approach: benefits and challenges

Comments in this section echoed similar made earlier in the survey in relation to hybrid being an

optimal compromise; that it offers a practical pathway that combines the measurability and clarity of metrics with the nuance and contextual understanding of professional ecological judgment. Several respondents said a BNG approach could build on existing ecological assessment frameworks, requiring only minor adjustments to reporting and processes. Others observed that success of a hybrid approach, like a qualitative approach, depends on experienced ecologists, as well as adherence to mitigation principles, effective monitoring, and addressing skills gaps within the profession.

Practical implementation of Biodiversity Net Gain

At what scales should BNG be mandatory, and should there be exemptions?

Almost 80% of respondents said BNG should be mandatory for large development; and, 70% said BNG should be mandatory for medium development.

40% said BNG should be an expectation to achieve permission for small development, but views were more divided for this scale.

In response to the question of whether there should be any modified approaches or exemptions, 30% of respondents said “no”, with several commenting that BNG should apply to all developments to prevent cumulative biodiversity loss.

70% said “yes”, that allowing modified approaches or exemptions to Biodiversity Net Gain (BNG) is likely to be necessary, particularly at smaller scales, to ensure the policy remains practical and proportionate.

Commonly suggested exemptions included:

- Small-scale developments where onsite BNG options are not feasible, such as certain housing projects, and works focused on restoration or conservation of protected habitats or species. Others said housing should not be exempt, but that very small developments such as house extensions should be.
- Developments for essential public functions where suitable land is limited

(e.g., health, defence, local authority housing, infrastructure), and remediation of contaminated land.

- Developments mandated under current legislation, affordable housing (with the exception of self- or custom-build), and projects of strategic national importance or those supporting climate targets were also identified as candidates for exemption.
- Exempt works—especially those involving operational infrastructure upgrades—should not be subject to BNG if they pose environmental risks.
- Urban sites were also highlighted as potentially suitable for exemptions or offsite compensation.

Some recommended that exemptions be determined at the local authority level to support appropriate planning decisions.

Many respondents made reference to offsite delivery of BNG (summarised in more detail in a later section on offsite BNG delivery).

Irreplaceable habitats and species considerations

Risk reduction for irreplaceable habitats

Half of respondents said that believed there was “some risk” to irreplaceable habitats, and 12% said there was “high risk”.

15% said there was “no risk for irreplaceable habitats”, with many commenting that risk from BNG was less than that from inaction, and some that they expected development would be prohibited or strictly controlled on irreplaceable habitats.

Recommendations given for risk reduction for irreplaceable habitats can be summarised as follows:

- Development on irreplaceable habitats must be prohibited or strongly discouraged.
- Identification and definition of irreplaceable habitats in Ireland in guidance.
- Adequate provision of in-house ecological expertise for local planning authorities

and early engagement of ecologists by developers to identify and mitigate against harm to irreplaceable habitats and species.

- National strategic planning for irreplaceable habitats and species.
- Make BNG a component of or complimentary to ecological assessments.
- Include consideration of Irreplaceable habitats that sit within a buffer of the development.
- Identify irreplaceable habitats in scoping reports as a requirement of large proposals.
- Increase awareness of the value of irreplaceable habitats and the impact of its loss.

Several said that a hybrid approach to BNG that incorporates ecological expertise would minimise risk to habitats and species.

Risk reduction for species

35% of respondents considered that BNG posed “some risk” to species, and 9% said it posed a “high risk”. 7% said there was “no risk for species”, with similar reasons cited as for “no risk to irreplaceable habitats”.

Recommendations given for risk reduction for species can be summarised as follows:

- Account for species in whichever BNG approach is used.
- Irreplaceable habitat should include that for species of concern on which development should be prohibited or restricted.
- Provision of up-to-date data on Ireland’s habitats and species.
- Guidance containing a toolbox of evidence-backed, proven measures for risk-reduction to species.
- Publish the monitoring results of mitigation and compensation measures to allow developers to identify successful strategies and high-risk approaches.
- Account for mosaics and ecotones — which are especially important for invertebrates — in BNG.

- ☐ Improve ecological capacity so that there are more competent ecologists with less time-pressure who can better account for species.

Biodiversity Net Gain offsetting

Should there be an option for offsite BNG?

The vast majority of respondents were of the view that “yes”, there should be an option for offsite BNG.

The top ranked response was “through financial contribution to a Local Authority to deliver Biodiversity Net Gain” with 54% of respondents supporting this option followed by, “...gifting land for a Local Authority to manage for Biodiversity Net Gain”, 51%; “through financial contribution to an NGO to deliver biodiversity net gain”, 44%; “by gifting land for an NGO to manage for biodiversity net gain”, 44%; “through financial contribution to a private/for-profit company to deliver Biodiversity Net Gain”, 32%; and “by gifting land for a private/for-profit company to manage for Biodiversity Net Gain”, 26%.

Almost 20% said offsite should be an option, but not through these means. Alternatives proposed include:

- ☐ Offsetting on land within the applicant’s ownership (blue line boundary of the planning application).
- ☐ Requiring developers to establish a trust to manage a comparable alternative offsite.
- ☐ Requiring developers to make a legal commitment to enhance and maintain land they have purchased.
- ☐ Allowing developers to contribute financially to an organisation dedicated to creating and maintaining offsite biodiversity gain.

Some gave recommendations for the management of offsite BNG, including:

- ☐ Careful management of offsite BNG through a clear framework that sets out monitoring and regulation requirements.
- ☐ Strategic regional planning so that offsetting can contribute to nature-depleted

landscapes by making them bigger, better, more connected.

- ☐ Require that offsite BNG be in as close a proximity to the development site as possible.
- ☐ Allow offsite BNG only as a last resort in certain, clearly defined circumstances.
- ☐ An option for offsite BNG management through local community groups.

3% of respondents said there should be no option for offsite;

13% said they were “unsure”, citing the limited capacity of local authorities and NGOs to manage BNG sites effectively, and questioning the ability of private companies to deliver appropriate habitat creation and management. Concerns were raised about the risk to local biodiversity from developers offsetting local ecological impacts by selecting unrelated or distant sites; habitat replacement should preferably occur within the same council or administrative area to maintain local biodiversity values. Scepticism was also expressed in relation to the ecological benefits of some large-scale planting initiatives, such as mass tree planting, especially when trees are planted in inappropriate locations or fail to thrive.

Should there be a system or registry for BNG?

70% said they would like to see a system or registry for BNG, including for reasons of monitoring and transparency, but also to support long-term management and to help ensure that future development on offsetting sites is avoided or controlled. To this end, one respondent said that offsetting sites should have planning policy protection as a minimum and, ideally, legal protection.

22% were “unsure”, and 7% said “no”. For these groups, comments revealed mixed views on the necessity and feasibility of a BNG registry in Ireland. While the concept was generally seen as positive, significant concerns were raised about its practical implementation, administrative complexity, and the current capacity for effective long-term management. Some suggested that existing facilities might provide a starting point, but some considered a BNG registry to be challenging and possibly premature at this stage.

Marine environment and Biodiversity Net Gain

Should a BNG approach for the marine environment be developed?

Over half of respondents (55%) said “yes”, a BNG approach for the marine environment should be developed. Comments cite both the urgent need for improved marine protection and the potential opportunities and threats presented by upcoming marine developments, including offshore wind farm and port development. While implementation may differ from terrestrial approaches, a well-designed marine BNG framework could play a transformative role in safeguarding and enhancing Ireland’s marine biodiversity. One respondent said that as all marine waters are state-owned, implementation and regulation of marine BNG may be easier compared to fragmented terrestrial ownership.

37% said that they were “unsure”; comments indicate there is broad support for considering BNG in the marine environment, with recognition that it is important, though likely a long-term goal owing to substantial practical, economic, and governance challenges:

- ☐ **Understanding of marine ecosystems:** Significant technical, ecological, and knowledge barriers mean that marine biodiversity is less familiar and more complex to assess.
- ☐ **Governance and coordination:** Coordination between multiple would be required and governance issues must be addressed.
- ☐ **Feasibility and economic issues:** High costs and logistical difficulties associated with marine BNG implementation.
- ☐ **Enforcement and monitoring:** Difficulties in enforcing and monitoring marine BNG commitments.
- ☐ **Ecological expertise:** Lack of specialist marine ecologists poses a capacity challenge.

Just under 8% of respondents said “no”; comments indicate that they consider that a BNG approach for the marine is currently premature for Ireland for many of the reasons outlined above. The suggestion then is to focus

on building terrestrial BNG first and to expand to the marine environment as research, resources, and policy frameworks mature.

Long-term management

For how long should achieved BNG be secured?

Over half of respondents (58%) said that any BNG achieved should be secured in perpetuity. 40% proposed that it be secured for a specific number of years; and 3% said that there should be no such requirement.

Proposals for duration of security include: 10, 20, 25, 30, 50, 99 and 100 years. Other proposals were that BNG be secured for the lifetime of the development, or that it should be reviewed at regular intervals with a view to securing gain in perpetuity.

Several respondents noted that while securing BNG in perpetuity is the ideal, there are non-ecological constraints which mean this is not always practical, including in relation to land ownership and leasing, and whether planning consent is itself in perpetuity.

Monitoring and training

Challenges to monitoring the outcomes of BNG

The top ranked response to the question of challenges to monitoring the outcomes of BNG measures was “lack of capacity (people and expertise)” with 90% of respondents supporting this option followed by, “lack of resources (including funding)”, 84%; “lack of legislative backing”, 80%; “lack of leadership on developing new approaches to monitoring BNG outcomes”, 54%; and “not enforceable”, 45%.

3% of respondents said “other”; comments included a question of penalty enforcement if planning conditions are not met, and a lack of willpower to implement and enforce BNG by planning authorities.

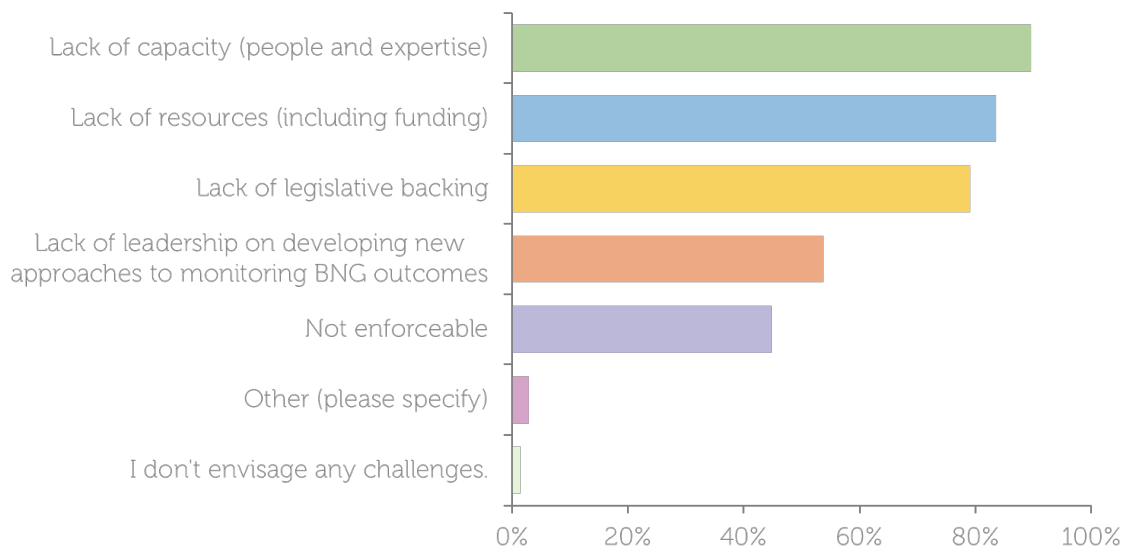


Figure 4: Challenges for monitoring the outcomes of Biodiversity Net Gain measures

Ecological assessments and Biodiversity Net Gain

BNG and the wider ecological assessment landscape

Around half of respondents (52%) were of the view that BNG assessment should be included in EcIA reports; 22% said that the two assessments should be separate, with EcIA the primary assessment; 22% said “other”; and 5% said that BNG should be used for reporting, but not for planning.

Several respondents argue that BNG should be a stand-alone assessment, distinct from EcIA and EIA, because it addresses different ecological resources and objectives. EIA and EcIA have strict legal definitions and are focused on significant effects, which may not align with the broader aims of BNG. If BNG is to be fully integrated with EcIA, guidance for EcIA would need updating to reflect the broader scope of BNG. Keeping BNG and EIA separate may be necessary to avoid legal and consenting risks due to differences in scope and statutory requirements.

Necessary experience for conducting BNG assessments

The majority of respondents were of the view that either 3-4 years (50%) or 5-6 years (30%) was sufficient

experience for an ecologist to carry out a BNG assessment.

Others indicated in the comments of question 50 that they considered provision of robust training, adequate supervision, and specific knowledge—especially in botany and impact assessment—to be equally critical to qualifications and years of experience in ensuring high-quality, reliable BNG outcomes.

Training requirements for conducting BNG assessments

A majority of respondents (77%) said “yes”, ecologists should be required to attend a training course before carrying out BNG assessments. 12% said that training was necessary of using a metric, and 11% said that any ecologists with sufficient experience can learn independently.

Respondents who said “yes” were asked what they think should be included in a training course. These can be summarised as:

Foundational ecological knowledge and technical skills:

- Training in habitat identification, botanical skills, and species ecology (including invertebrates and indicator species).

- ☐ Understanding of habitat restoration, management, and the viability of mitigation options.
- ☐ Use of GIS and other tools for mapping, measuring, and reporting biodiversity losses and gains.
- ☐ Introduction to Biodiversity Net Gain (BNG): definitions, importance, and legislative/ policy context.
- ☐ Overview of the principles behind BNG, including the mitigation hierarchy and how BNG fits into wider ecological assessment and planning frameworks.

Approaches and methodology:

- ☐ Training on both quantitative (metric-based) and qualitative (professional judgement) assessment methods, including worked examples and case studies.
- ☐ Guidance on how to interpret metric results, and how to handle situations not adequately addressed by metrics.

Experience of practical application:

- ☐ Hands-on exercises, run-throughs of example BNG assessments, including desktop and fieldwork components.
- ☐ Real-life case studies illustrating successful BNG implementation, challenges encountered, and lessons learned.
- ☐ Group work and discussion to generate and critique metric outputs and management actions.

Competency and professional standards:

- ☐ Competency assessments and certification to ensure a standardised approach and industry-wide consistency.
- ☐ Training on how to review the adequacy of information, identify knowledge gaps, and knowing when to seek additional expertise.

Integration into project plans:

- ☐ Explanation of how BNG links with EcIA, EIA, and planning processes, including how BNG measures should be incorporated into project design and planning conditions.
- ☐ Guidance on baseline reporting, significance of impact, and how to integrate BNG into the project lifecycle from conception to post-development monitoring.

Acknowledgements

CIEEM wishes to thank all those who participated in this survey.

If you have any questions relating to this survey or our ongoing work relating to BNG in Ireland, please contact policy@CIEEM.net





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Company Number: RC000861
Registered Charity (England and Wales): 1189915.