



Sonairte's submission to the public consultation on the draft Fourth National Biodiversity Action Plan (NBAP)

Submitted to the National Parks and Wildlife Service (NPWS) via the Department of Housing, Local Government and Heritage.

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Submitted via email to: NBAPConsultation@housing.gov.ie

With copy via email to the Citizens Assembly on Biodiversity Loss submissions@citizensassembly.ie

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Introduction

Sonairte welcomes this fourth iteration of Ireland's National Biodiversity Action Plan (NBAP) and welcomes the opportunity to comment on it¹. The Plan is an important one that will set the national biodiversity agenda for the period 2023-2027.

An effective and ambitious National Biodiversity Action Plan has arguably never been more important. The report of the June 2021² IPBES-IPCC Co-Sponsored Workshop on Biodiversity and Climate Change reminds us that:

"A sustainable society requires both a stabilized climate and healthy ecosystems. However, 77% of land (excluding Antarctica) and 87% of the area of the ocean have been modified by the direct effects of human activities. These changes are associated with the loss of 83% of wild mammal biomass, and half that of plants. Livestock and humans now account for nearly 96% of all mammal biomass on Earth, and more species are threatened with extinction than ever before in human history. Climate change increasingly interacts with these processes. Anthropogenic release of greenhouse gases from fossil fuel combustion, industry, Agriculture, Forestry and Other Land Use (AFOLU), now overall exceeding 55 GtCO₂ yr⁻¹, continues to rise and has already led to global warming above 1°C relative to pre-industrial times. Climate change and biodiversity loss pose significant threats for human livelihoods, food security and public health".

Source:³

The climate crisis and biodiversity crisis are interlinked and represent an existential threat to humanity.

The IPCC 6th Assessment Report⁴ was described by UN Secretary-General António Guterres as "a code red for humanity".

The IPCC 6th Assessment Report - Climate Change 2022: Impacts, Adaptation and Vulnerability outlines the magnitude of the crisis facing humanity⁵. The summary for policymakers headline statements notes:

"Safeguarding biodiversity and ecosystems is fundamental to climate resilient development, in light of the threats climate change poses to them and their roles in adaptation and mitigation (very high confidence). Recent analyses, drawing on a range of lines of evidence, suggest that maintaining the resilience of biodiversity and ecosystem services at a global scale depends on effective and equitable conservation of approximately 30% to 50% of Earth's land, freshwater and ocean areas, including currently near-natural ecosystems (high confidence)".

In Ireland Dr Lysaght, Director of the National Biodiversity Data Centre noted in response to the 2019 IPBES Global Assessment Report on Biodiversity and Ecosystem Services⁶, that here in Ireland:

- *"Of the species that have been assessed, one in every fifth species is threatened with extinction here.*
- *One in every third species of bee is threatened with extinction.*
- *The conservation status of one third of our habitats afforded legal protection under the EU Habitats Directive dis-improved between 2007 and 2013.*
- *37 species of bird are of high conservation concern, including species such as curlew, hen harrier, twite and yellowhammer. The corn bunting has become extinct since around 2000 and the once widespread corncrake is just lingering on in the western extremities of counties Donegal and Mayo.*

¹ Ireland's 4th National Biodiversity Action Plan Draft for Public Consultation <https://www.gov.ie/en/consultation/1566c-public-consultation-on-irelands-4th-national-biodiversity-action-plan/?referrer=http://www.gov.ie/biodiversityplan/#documents>

² Pörtner, Hans-Otto, Scholes, Robert J., Agard, John, Archer, Emma, Arneth, Almut, Bai, Xuemei, Barnes, David, Burrows, Michael, Chan, Lena, Cheung, Wai Lung (William), Diamond, Sarah, Donatti, Camila, Duarte, Carlos, Eisenhauer, Nico, Foden, Wendy, Gasalla, Maria A., Handa, Collins, Hickler, Thomas, Hoegh-Guldberg, Ove, ... Ngo, Hien. (2021). Scientific outcome of the IPBES-IPCC co-sponsored workshop on biodiversity and climate change (Version 5). Zenodo. <https://doi.org/10.5281/zenodo.5101125>

³ IPBES-IPCC CO-SPONSORED WORKSHOP BIODIVERSITY & CLIMATE CHANGE WORKSHOP REPORT https://ipbes.net/sites/default/files/202106/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf

⁴ IPCC 6th Assessment Report <https://www.ipcc.ch/assessment-report/ar6/>

⁵ IPCC 6th Assessment Report - Climate Change 2022: Impacts, Adaptation and Vulnerability <https://www.ipcc.ch/report/sixth-assessment-report-working-group-ii/>

⁶ IPBES (2019): Summary for policymakers of the global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. S. Díaz, J. Settele, E. S. Brondízio, H. T. Ngo, M. Guèze, J. Agard, A. Arneth, P. Balvanera, K. A. Brauman, S. H. M. Butchart, K. M. A. Chan, L. A. Garibaldi, K. Ichii, J. Liu, S. M. Subramanian, G. F. Midgley, P. Miloslavich, Z. Molnár, D. Obura, A. Pfaff, S. Polasky, A. Purvis, J. Razzaque, B. Reyers, R. Roy Chowdhury, Y. J. Shin, I. J. Visseren-Hamakers, K. J. Willis, and C. N. Zayas (eds.). IPBES secretariat, Bonn, Germany. 56 pages. <https://doi.org/10.5281/zenodo.3553579>

- *Three of our iconic fish, the Atlantic salmon, European eel and angel shark have suffered catastrophic population declines, and the freshwater pearl mussel, Ireland's longest living animal, is facing extinction.*
- *Our native white-clawed crayfish is threatened with the recent arrival of the crayfish plague.*
- *Everyone who have worked or walked in the countryside over the last 30 or 40 years will attest to a huge reduction in the biomass of insect life. Our fields have fallen silent; now hedgerows and patches of scrub are under attack like never before.*
- *Nature conservation continues to be chronically under-funded by Government"*

Source: ⁷

Red Lists of conservation status of native species are produced on a periodic basis by the NPWS and have been collated in a readily publicly accessible form by the National Biodiversity Data Centre ^{8, 9}. Additional funding is needed to update the Red Lists more frequently, however the impact of human activities on biodiversity is clear as noted above.

The EPA produces state of the environment reports every four years, the latest in 2020 ¹⁰. The 2020 report notes *"the overall quality of Ireland's environment is not what it should be, and the outlook is not optimistic"*. The report uses a scorecard assessment and Ireland scores as "very poor/significant environmental and/or compliance challenges to address" on indicators for **Nature** and on **Climate**, and "poor/environmental and/or compliance challenges to address" on **Water Quality**; **Waste and Circular Economy**; and **Radon**. Only **Air Quality**, was assessed as "Moderate/on track generally/local or occasional challenges" with no areas assessed as "good" or "very good".

For **Nature** the EPA Current Assessment Scorecard notes *"Overall, current assessment is very poor. Deteriorating trends dominate, especially for protected habitats, with 85% of EU protected habitats having an unfavourable status. The picture for EU protected species is mixed, but 15% are in decline, with freshwater species most at risk. Agricultural practices are a key pressure. Habitat changes point towards a deteriorating trend in overall biodiversity. Some species, such as the curlew and some freshwater species, are under threat; measures are needed to halt their decline"*.

For **Climate** EPA Current Assessment Scorecard notes *"Continuing high emissions result in a 'very poor' current assessment, despite progress on renewable energy, ambitious climate action and adaptation plans and strategies, and new governance structures (e.g. the Climate Action Regional Offices). 2020 emissions reductions targets will not be met without relying on purchasing credits or allowances."*

For **Water Quality** the EPA Current Assessment Scorecard notes *"Overall, current assessment is poor. Trends are mixed with serious declines in pristine river sites. Just over 50% of surface water is in a satisfactory ecological condition. This means that almost half fails to meet the legal requirements of the Water Framework Directive (2000/60/EC). There have been deteriorating water quality trends over the past 20 years, especially for rivers, where there have been major decreases in the numbers of the cleanest and best quality rivers. Progress remains slow in improving urban wastewater treatment, eliminating untreated sewage discharges and reducing nutrient loss from agriculture"*

The NPWS carries out monitoring and reporting every 6 years of sites protected by the EU Habitats Directive (European Council Directive on the Conservation of Habitats, Flora and Fauna 92/43/EEC). The most recent report in 2019 ¹¹ found that most Irish habitats listed on the Habitats Directive are in Unfavourable status and almost half are demonstrating ongoing declines.

It remains the case that despite national targets and in some cases even despite legally binding commitments, actual measurable real world progress to improve the status of our biodiversity is very poor.

⁷ IPBES and Irelands Biodiversity Crisis IPBES & Ireland's biodiversity crisis <https://biodiversityireland.ie/ipbes-irelands-biodiversity-crisis/>

⁸ Red Lists <https://biodiversityireland.ie/publications-category/red-lists/>

⁹ Regional Red List of Irish Bees <https://biodiversityireland.ie/publications-category/red-lists/?search=bees>

¹⁰ Ireland's Environment An Integrated Assessment 2020 <https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/irelands-environment-2020---an-assessment.php>

¹¹ The Status of EU Protected Habitats and Species in Ireland 2019

https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf

We therefore welcome the increased national recognition of the importance of biodiversity for example the Citizens Assembly on Biodiversity Loss ¹², and the initiation of a National Biodiversity Conference now in its 2nd year ¹³.

However we believe the National Biodiversity Action Plan (NBAP) in its current form is deeply flawed in three major respects and requires substantial revision in order to be fit for purpose.

1. Accessibility:

- The draft DBAP is overly wordy (107 pages) and falls into the trap of TLDNR (Too Long Didn't Read). This severely hinders its readability and its accessibility to both a general and scientific audience since it is hard to find the actual content within the excess of verbiage. We would strongly recommend reducing the page number by around a third and using shorter and more concise language and a simpler presentation style. As an example for a style guide the EU Biodiversity Strategy for 2030 is available in a shorter more technical and well referenced communication version of 23 pages ¹⁴ with a 4 page Annex¹⁵. The longer public version including annex, photographs and images is 36 pages in length ¹⁶ but still presented in a concise, easy to follow style.
- Despite the length of the draft national NBAP it is poorly referenced with only 8 references cited. Only two of these are provided with hyperlink or doi, again making that information inaccessible.
- The headers are not clickable so the document is hard to navigate
- The Objectives are poorly formulated and are vaguely aspirational and woolly e.g. "Adapt a whole government, whole society approach to biodiversity" as objective 1. Each objective is surrounded by a page of flannel text and then supported by listed Outcomes, each of which has a long table with Targets, Actions and Indicators. This is a difficult to follow style and some of the actual very welcome and hard hitting objectives that reflect the Key Commitments and Goals of the EU Biodiversity Strategy 2030 (such as Action 2B3 "By 2030, land under organic farming is increased to 7.5% and at least 4% of agricultural land has biodiversity rich landscape features"; Outcome 2C: "All freshwater bodies are of at least 'Good Ecological Status' as defined under the EU Water Framework Directive") get lost in the wordiness. We would strongly urge a complete re-working of the structure to make it more simple, more concise, easier to follow and more impactful, by either:
 - a) Making the Objectives SMART (Specific, Measurable, Achievable, Realistic and Time-bound) and underpinning each with a small number of Key Performance Indicators. A way of doing so would be to reverse the style making the Outcomes or in some cases the Actions into Objectives and the Targets into Key Performance Indicators (KPIs), and deleting repetitive or excess words - with the date of delivery and responsible agent in parenthesis – for example Outcome 2 C (currently 3 pages in length!) would become:

Objective X: By 2027 all Irish freshwater bodies are of at least 'Good Ecological Status' as defined under the EU Water Framework Directive.

¹² Citizens Assembly on Biodiversity Loss <https://www.citizensassembly.ie/en/assembly-on-biodiversity-loss/submissions/>

¹³ National Biodiversity Conference <https://www.biodiversityconference.ie/programme>

¹⁴ COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS. Brussels, 20.5.2020 COM(2020) 380 final . EU Biodiversity Strategy for 2030 Bringing nature back into our lives https://eurlex.europa.eu/resource.html?uri=cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0001.02/DOC_1&format=PDF

¹⁵ ANNEX to the COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS EU Biodiversity Strategy for 2030 Bringing nature back into our lives. Brussels, 20.5.2020 COM(2020) 380 final ANNEX. https://eurlex.europa.eu/resource.html?uri=cellar:a3c806a6-9ab3-11ea-9d2d-01aa75ed71a1.0001.02/DOC_2&format=PDF

¹⁶ European Commission, Directorate-General for Environment, *EU biodiversity strategy for 2030 : bringing nature back into our lives*, Publications Office of the European Union, 2021, <https://data.europa.eu/doi/10.2779/677548>

KPI 1 – Implementation of 2022-27 River Basement Management Plan¹⁷ (2027; DHLGH, DAFM, Local Authorities).

KPI 2 – Implementation of Nitrates Action Plan¹⁸ (December 2025; DAFM)

KPI 3 – Implementation of Water Services Strategic Plan 2015-2040¹⁹(2040; Irish Water).

KPI 4 - High status catchment delineation and prioritisation under Blue Dots Catchment programme (2027; DHLGH and LAWPRO).

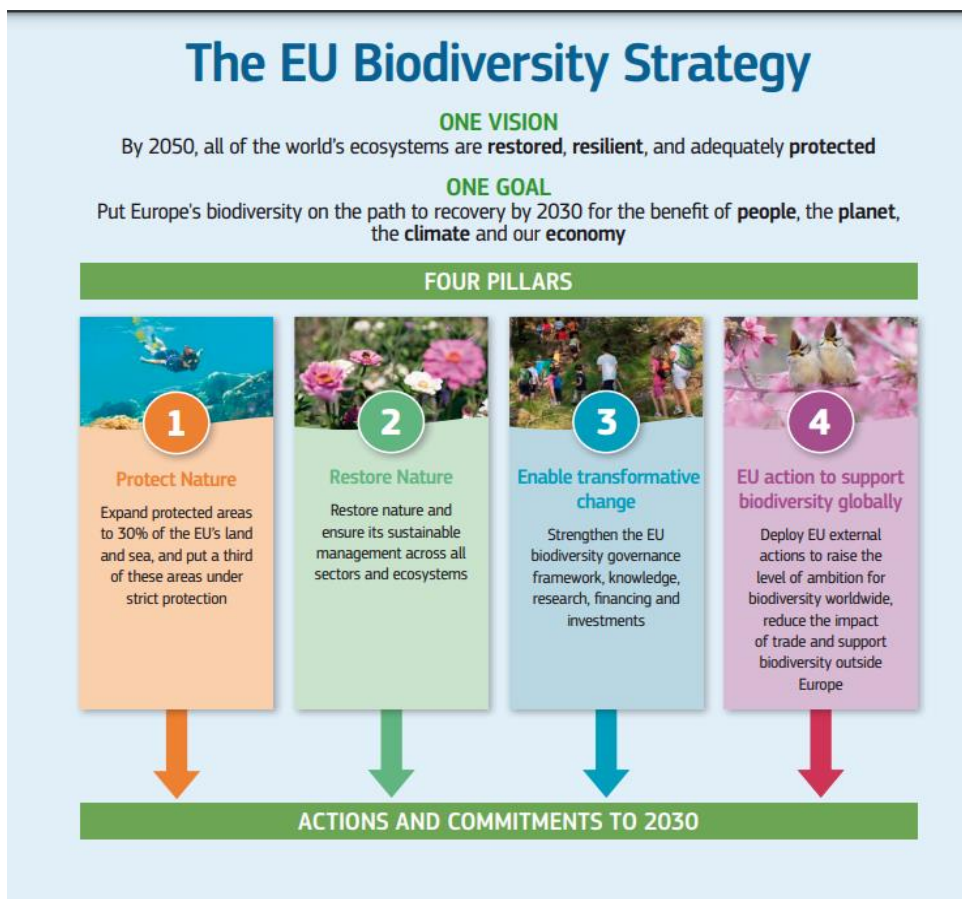
KPI 5 – Action Plan to protect 3110 Oligotrophic Isoetid lake habitat assessed under Article 17 Habitats Directive reporting¹¹ as bad conservation status (2027, DHLGH).

Despite having a much shorter more concise presentation, the paragraph above actually contains all of the information in the 3 pages it is extracted from and in addition it includes easily accessible references to linked strategies and action plans for readers seeking background or additional detail.

Or:

- b) Directly reflecting the EU Biodiversity Strategy for 2030 style and presentation of objectives into the Irish context. In the EU document an overall Vision underpins a single Goal with 4 pillars – each Pillar then has a number of Key Commitments and Goals which are SMART (See Figure 1 and 2 below).

Figure 1. EU Biodiversity Strategy for 2030, p8

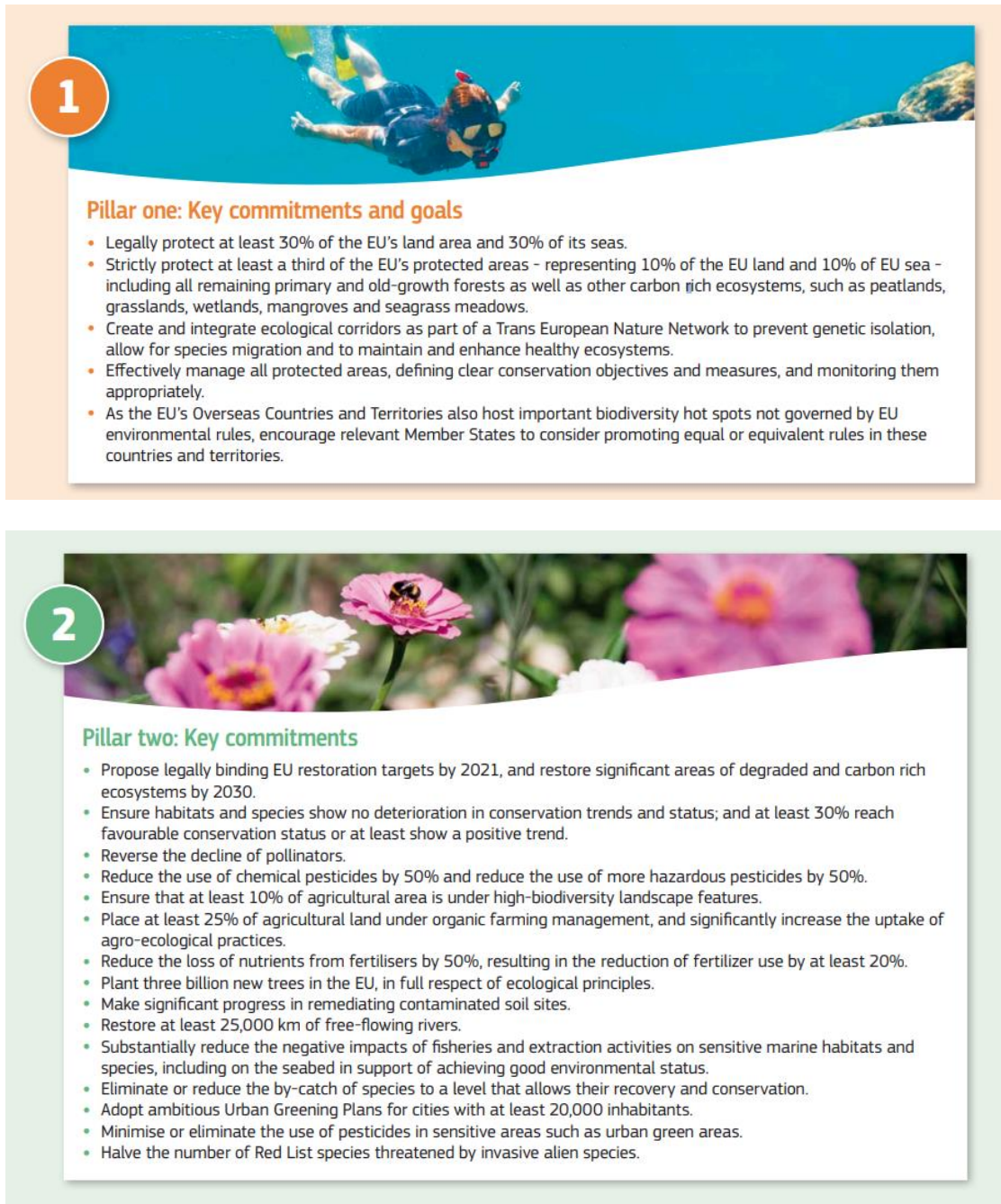


¹⁷ 2022-27 River Basement Management Plan <https://www.catchments.ie/third-cycle-draft-river-basin-management-plan-2022-2027-consultation-report/>

¹⁸ 5th Nitrates Action Programme <https://www.gov.ie/en/publication/f1d01-fifth-nitrates-action-programme-2022-2025/#view-the-programme>

¹⁹ Water Services Strategic Plan A Plan for the Future of Water Services https://www.water.ie/docs/WSSP_Final.pdf

Figure 2. EU Biodiversity Strategy for 2030 Pillar 1 and Pillar 2 Key commitments



2. **Ambition:**

The Irish NBAP while welcome in many aspects is not sufficiently ambitious and completely fails to reflect the ambition of the EU Biodiversity Strategy for 2030 in a number of areas.

Using Pillar 1 and Pillar 2 as examples:

Pillar 1 commitments

For **Pillar 1** the EU Biodiversity Strategy commits to:

- *Legally protect at least 30% of the EU's land area and 30% of its seas.*
- *Strictly protect at least a third of the EU's protected areas - representing 10% of the EU land and 10% of EU sea - including all remaining primary and old-growth forests as well as other carbon rich ecosystems, such as peatlands, grasslands, wetlands, mangroves and seagrass meadows*

While the draft NBAP has several outcomes that touch upon this – Outcome 2A, Outcome 2E, Outcome 2F among others it is really unclear if Ireland is addressing this commitment, and there certainly seems to be no clear commitment made on legal protection of significant land or marine areas.

For **Pillar 1** commitment 3:

- *Create and integrate ecological corridors as part of a Trans European Nature Network to prevent genetic isolation, allow for species migration and to maintain and enhance healthy ecosystems.*

In the Irish NBAP the only reference to ecological corridors is in a subpart of Action 2A10 “*Údarás na Gaeltachta will undertake a review of estates and lands within their operational zones, with a view to... identifying lands suitable for Biodiversity Corridors*”. A very poor translation of the overarching EU commitment.

Pillar 2 commitments

For **Pillar 2** the EU Biodiversity Strategy sets out 15 ambitious and measurable commitments (see Figure 2 above). The national draft NBAP whilst it might contribute to some of these often falls short in both ambition and clarity.

Action 2E2 is excellent and directly translates the EU commitment into the Irish scale accompanied by a valid and verifiable indicator - “*In line with the EU Biodiversity Strategy, 300 km of rivers are restored to a free flowing state by 2030*” Indicator “*Km of rivers restored to a free-flowing state*”, however others fall far short.

For **pesticides** the EU Biodiversity Strategy for 2030 makes several commitments:

- *Reduce the use of chemical pesticides by 50% and reduce the use of more hazardous pesticides by 50%.*
- *Minimise or eliminate the use of pesticides in sensitive areas such as urban green areas.*

In the Irish NBAP however this is watered down to “*In line with the EU Biodiversity Strategy, the use and risk of pesticides is reduced by 50% by 2030*” overseen by DAFM, Teagasc and Local Authorities and measured by “*Percentage reduction in pesticide use against established baseline*”. There is no commitment to elimination of pesticides in urban green areas and it is unclear who will decide the “*established baseline*” or how it will be transparent and not subject to vested interest groups.

For **organic and biodiversity friendly agriculture** the EU Biodiversity strategy commits to:

- *Ensure that at least 10% of agricultural area is under high-biodiversity landscape features.*
- *Place at least 25% of agricultural land under organic farming management, and significantly increase the uptake of agro-ecological practices*

In the Irish NBAP however this is watered down to Action 2B3 “*By 2030, land under organic farming is increased to 7.5% and at least 4% of agricultural land has biodiversity rich landscape features*”.

While we recognise that this is the first time a timebound target for land under organic management is set in Ireland and it is coming from a low baseline, we suggest the target should be higher for organic land use. For the high biodiversity landscape features these should be easier to achieve and there is no reason the EU target of 10% should not be used for Ireland rather than the 4% in the NBAP.

For **fertiliser** use the EU Biodiversity Strategy for 2030 commits to

- *Reduce the loss of nutrients from fertilisers by 50%, resulting in the reduction of fertilizer use by at least 20%.*

In the Irish NBAP however this is watered down to vague commitments to “*circular and localised nutrient management*” with no hard targets and the word “*fertiliser*” (or “*fertilizer*”) does not occur in the document at all.

In the Irish draft NBAP “*Outcome 4C: Nature-based solutions that combine benefits for biodiversity, and climate change adaptation are being widely implemented at a national, regional, and local scale*”, the broad terminology

of “nature-based solutions” is used, the premise of which is welcomed by Sonairte, however, this term includes many facets of ecosystem restoration and could benefit from more specificity in order to create more actionable goals.

The UN recently announced its “Decade on Ecosystem Restoration”, asking governments to commit to restoring a combined total of one billion hectares of land before 2030²⁰. **Rewilding** is set to form an essential part of realising this ambition²¹. Yet, while restoration is mentioned several times throughout the document, the interrelated but scientifically distinct area of rewilding²² is not mentioned once. We feel that this represents a significant oversight considering the strength of the emerging evidence for rewilding, and particularly trophic rewilding²³, as a highly promising area of restoration ecology which is set to play a central and potentially revolutionary role in restoring both biodiversity²⁴ and urgently needed ecosystem services such as carbon sequestration and storage, which also has significant beneficial knock-on effects for promoting climate mitigation, adaptation, and resilience²⁵.

According to the IUCN Rewilding Task Force, rewilding is “...the process of rebuilding, following major human disturbance, a natural ecosystem by restoring natural processes and the complete or near complete food-web at all trophic levels as a self-sustaining and resilient ecosystem using biota that would have been present had the disturbance not occurred”²¹.

Rewilding is an integral part of the spectrum of restoration and, in our view, it should be included as an integral part of a diversity of restoration efforts in Ireland, which currently has one of the poorest track records for biodiversity and for biodiversity action in the EU according to the Central Statistics Office²⁶. Rewilding approaches ecosystem restoration through a whole-systems lens, which integrates interconnected areas (as mentioned as an important factor by Minister Noonan in the forward to the Fourth NBAP document) and works through the central premise of releasing intensive human pressures on ecosystems in order to allow natural systems to repair and maintain themselves with minimal human intervention^{22,24}.

3. Transparency:

It is not fully clear in the NBAP how progress against the identified targets will be measured and how members of the public and interested stakeholders would be able to monitor and evaluate (and hold to account) Ireland’s progress on achieving the targets.

The lack of clarity around what the targets actually are and how they will be measured as noted in **Accessibility** section above reflects comments in the interim report of the 3rd NBAP as noted in the current NBAP daft. Specifically:

“The second intervention was an independent review conducted by the National Biodiversity Forum, available here. This review stated that the next NBAP must establish specific, measurable, actionable, realistic and time-bound (SMART) targets and Key Performance Indicators that will measure positive impacts on biodiversity. Targets should be focused on measurable results-based outcomes and actions with a strong evidence base for

²⁰ UNEP & FAO (2020). *Strategy for the UN Decade on Ecosystem Restoration* [online]. United Nations Environment Programme. Available at: <https://wedocs.unep.org/bitstream/handle/20.500.11822/31813/ERDStrat.pdf?sequence=1&isAllowed=y>

²¹ (IUCN RTG, 2020) *Rewilding Principles* [online]. International Union for the Conservation of Nature (IUCN). Commission on Ecosystem Management (CEM), Rewilding Thematic Group (RTG). Available at: https://www.iucn.org/sites/dev/files/content/documents/principles_of_rewilding_cem_rtg.pdf

²² Toit, J. T. & Pettolelli, N. (2019). The differences between rewilding and restoring an ecologically degraded landscape. *Journal of Applied Ecology*, 56(11), 2467–2471. Available at: <https://doi.org/10.1111/1365-2664.13487> (Accessed on 20 April 2022).

²³ Sandom, C. J., Middleton, O., Lundgren, E., Rowan, J., Schowaneck, S. D., Svenning, J. C., & Faurby, S. (2020). Trophic rewilding presents regionally specific opportunities for mitigating climate change. *Philosophical Transactions of the Royal Society B: Biological Sciences*, 375(1794). <https://doi.org/10.1098/rstb.2019.0125>

²⁴ Svenning, J. C. (2020). Rewilding should be central to global restoration efforts. *One Earth*, 3(6), 657–660. Available at: <https://doi.org/10.1016/j.oneear.2020.11.014>

²⁵ Egoh BN, Nyelele C, Holl KD, Bullock JM, Carver S, Sandom CJ (2021) Rewilding and restoring nature in a changing world. *PLoS ONE* 16(7): e0254249. <https://doi.org/10.1371/journal.pone.0254249>

²⁶ CSO, (2022). Central Statistics Office. Environmental Indicators Ireland 2020. <https://www.cso.ie/en/releasesandpublications/ep/p-eii/environmentalindicatorsireland2020/biodiversity/>

effectiveness.....Overall, it has been noted that the 3rd NBAP was difficult to monitor and evaluate given the open ended nature of many of the actions.”

While it is welcome that “task owners” are assigned to the actions and that a monitoring plan is in place it is not clear how transparent this will be, and much of it focusses on generation of report and documents.

While it is welcome that “DHLGH and NBDC will develop a progress tracker for this Plan comparable to the EU Biodiversity Strategy Actions Planner and which also maps this Plan to the Multilateral Environmental Agreements” – it will be important for the public and interested stakeholder to publicise and make a commitment to use and keep updated the Irish contributions into the existing EU Biodiversity Strategy Actions Dashboard <https://dopa.jrc.ec.europa.eu/kcbd/dashboard/> and Actions Tracker <https://dopa.jrc.ec.europa.eu/kcbd/actions-tracker/>

Figure 3. EU Biodiversity Strategy Actions Tracker

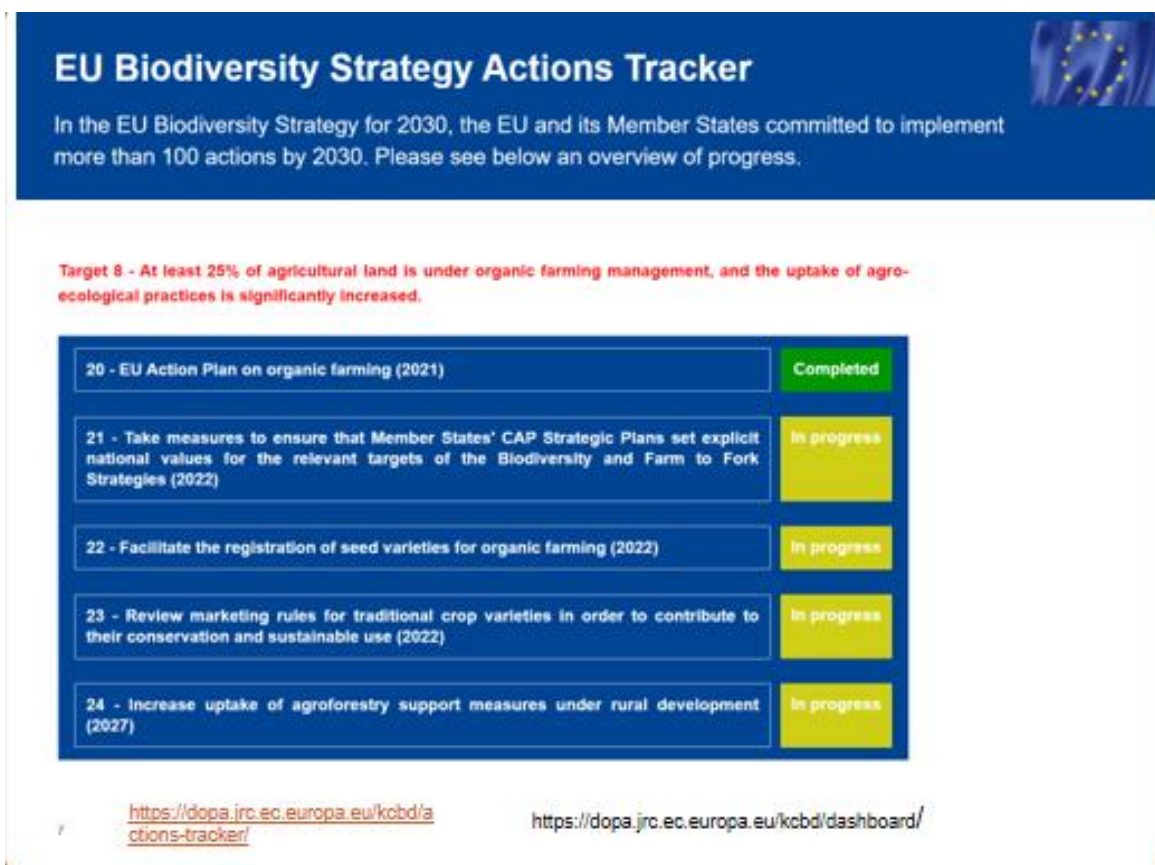
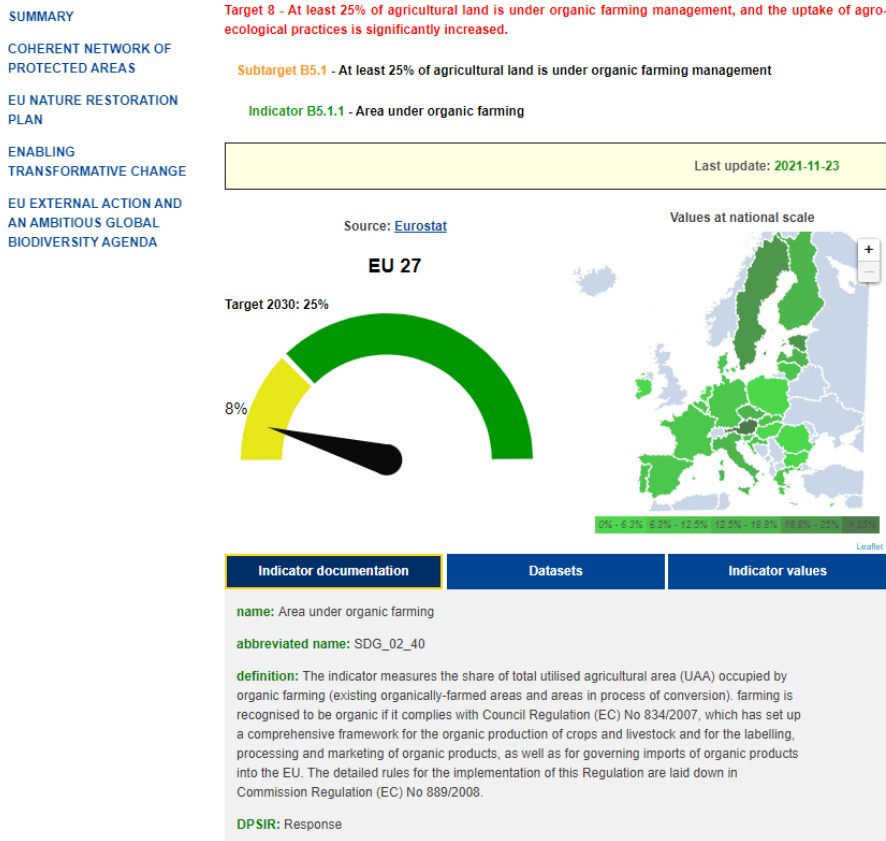


Figure 4. EU Biodiversity Strategy Dashboard



4. Accountability

The watering down of language and use of vague wording regarding placing the 4th NBAP on a statutory footing is evident in **Outcome 1B** (“Responsibility for biodiversity”), where it is stated that “By 2023, Government **has considered** introducing a statutory requirement for National Biodiversity Action Plans” and that “DHLGH **will explore** placing the National Biodiversity Action Plan on a statutory footing”. We strongly urge that it is not only a political obligation but a moral imperative for the biodiversity action targets to be made legally binding (as is the case with the Climate Action Plan) in order to reflect the severity of the global environmental crises that we currently face.

As noted in the first two stages of stakeholder engagement for the plan, there is a “need to pursue a legal basis for the NBAP” and a “need for a legal basis to secure the implementation of the Plan”, however, there is no assurance of any follow-through of this recommendation in the 4th NBAP, as is outlined above regarding the use of vague and noncommittal language. We would like to reinforce this point and strongly urge the DHLGH to change the wording in order to be aligned with its statements in the forward by Minister Noonan and the introduction of the document in order to ensure that the measures outlined will be translated into actual real world action and avoid the pitfall of environmental tokenism.

As outlined in the Irish Wildlife Trust’s recent submission to the Citizen’s Assembly on Biodiversity, we would agree and emphasise that the strengthening and increased funding of the Biodiversity Forum is also a key element to the success of the Fourth National Biodiversity Action Plan, where the previous three have failed to adequately address biodiversity decline in Ireland²⁷

²⁷ Irish Wildlife Trust submission to the Citizens’ Assembly on Biodiversity Loss, September 9th 2022. <https://iwt.ie/citizens-assembly/>