



Submission to DHLGH on the draft National
Biodiversity Action Plan 2023-2027

November 2022

Introduction to the Water Forum

The Water Forum is the national statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. It consists of 25 members including representatives from a wide range of organisations and sectors with interests in water issues including the environmental sector, the agriculture sector, consumers including customers of Irish Water, the rural water sector, river trusts, angling, recreation, the business sector, trade unions, the community and voluntary sector, forestry, education, social housing and tourism. Approximately 50 different organisations were involved in the nomination of members

Under the Water Services Act 2017, the Forum has advisory roles in relation to the Minister for Housing, Local Government and Heritage, Irish Water, the Commission for Regulation of Utilities and the Water Policy Advisory Committee.

The role of the Forum is to provide a platform for stakeholder engagement and dialogue on all matters relating to water as an environmental, economic and social asset. Stakeholders debate and analyse a range of issues with regard to water quality, rural water services, issues of concern to Irish Water customers, the implementation of the Water Framework Directive (WFD) and the River Basin Management Plan (RBMP) for Ireland. We provide a strong independent voice on policy pertaining to water quality, water conservation and future proofing.

Over the past number of years, the Water Forum has commissioned research to inform positions and engaged with experts and agencies to develop policy positions on matters pertinent to water management that are also relevant and important for biodiversity and nature management.

Introduction

The Water Forum welcomes many of the measures proposed in the draft National Biodiversity Action Plan (NBAP) and is making this submission to share further research and policy recommendations that we think will be of value to the members of the National Biodiversity Working Group in completing the final NBAP. This submission addresses proposed actions in the draft NBAP, where the Forum has additional information to add or has further recommendations for action.

The Forum is disappointed to note that National Biodiversity Stakeholder Forum does not have representation from the water sector in its membership and we would like to see this gap addressed going forward.

NBAP Objective 1: Adopt a whole of Government, whole of society approach to biodiversity.

The Water Forum is supportive of a whole of Government approach to biodiversity management and restoration in Ireland. The Water Forum believes that this approach needs to be expanded from one that considers interdepartmental and agency working, financial needs and capacity building for biodiversity, to include the impacts of this biodiversity action plan on other policy areas as well.

All of the components of our natural environment – air, water, ecosystems, soils, rocks, land and landscapes - are interrelated and interlinked. Therefore, management of these components must be undertaken in a cohesive, holistic and integrated manner, with water, climate and environmental

policies properly coordinated and aligned for effectiveness, despite being carried out across different areas and levels of government, different agencies and with the participation of many stakeholders.

In 2020, the Water Forum proposed the Framework for Integrated Land and Landscape Management (FILLM) which allows for the adoption of a systems-based approach that enables inclusion of all the relevant aspects of air, water, nature, soils, land and landscapes in a cohesive and unified manner. It builds on the Integrated Catchment Management (ICM) approach, that is currently being used in Ireland's River Basin Management Plan for water resources management, broadening it to include air, soils, climate and biodiversity, while retaining catchments as the appropriate landscape units.

FILLM can be considered as the overarching framework for environmental management providing the means of connecting different policies, such as the Water Framework Directive, Urban Waste Water Treatment Directive, Habitats Directive, Floods Directive, Drinking Water Directive, climate change adaptation and mitigation, soil conservation, spatial planning, and sustainable food and timber production. In this way, it provides an opportunity to achieve *policy coherence and strategic synergies between biodiversity policy and other policy priorities including, but not limited to, economic development, climate action, sustainable development, agriculture and tourism.*

In all environmental spheres, measures and actions are needed to protect our environment where it is satisfactory, while mitigating the impacts where it is under threat or is unsatisfactory. Many of the necessary measures and actions undertaken or planned for biodiversity can have co-benefits for water quality and climate adaptation because of the connectedness of nature. Therefore, using a systems-based approach provides an opportunity to identify synergies in actions that will have multiple benefits for all environmental components, and as a means of delivering effective and efficient outcomes for the environment and Irish society.

The challenge of this approach is the need for change in current ways of working whereby experts and specialists tend to work in 'silos'. All relevant public bodies with an environmental remit need to work together to adapt the approach and to address the multi-disciplinary and multi-organisational implications within their environmental management work programmes, to achieve optimum efficiency and effectiveness. The necessary resources would have to be provided to facilitate such engagements and outcomes.

In 2021, the Water Forum commissioned research into the challenges of implementing policy coherence in environmental management and the report, ['An Assessment of Policy Coherence and Conflicts for Water and environmental Management'](#) highlights the benefits and challenges of such approaches.

Recommendation for Objective 1

The Forum recommends the Framework for Integrated Land and Landscape Management approach is implemented for biodiversity management, as this systems-based approach can prioritise actions for water, climate and nature that have the largest synergetic impact. Implementation of landscape-based approaches requires multidisciplinary and multi-organisational collaborations, as well as environmental policy coherence, integration and implementation.

Objective 2: Meet Urgent Conservation and Restoration needs

Outcome 2A: Organisational capacity and resources for biodiversity have increased at all levels of Government

Ireland's peatlands are of national and international importance and should be adequately protected under Outcome 2A. Half of the blanket bogs considered to be of conservation importance in the European Atlantic Biogeographic Regional are found in Ireland along with some of the last remaining Oceanic raised bogs.

Only 18% of our 1.4 million hectares of peatlands (one fifth of Ireland's land area) are 'near-natural' or 'healthy'. 82% of original peatlands have been drained for peat extraction, agriculture or forestry, resulting in disruption to the hydrological balance, biodiversity and ecosystem services. It is estimated that 2 billion tons of carbon is stored in Ireland's peatlands, in blanket bogs along the west coast and in the raised bogs of the midlands.

In 2019, the Water Forum commissioned research on [Optimising Water Quality Returns from Peatland Management](#) while delivering co-benefits for climate and biodiversity. The Researchers, led by Florence Renou-Wilson, published a [synthesis report](#): Optimising Water Quality Returns from Peatland Management while delivering co-benefits for climate and biodiversity.

Priority actions identified by the researchers for peatland management for water, biodiversity and climate returns included:

- Include social values in peatland management and enhance stakeholder collaboration
- Identify land use/ land use change impacts and co-benefits of management options
- Implement existing policies and ensure full compliance with relevant regulations
- Investigate the current and future risks; monitor actions; and research alternatives.

Recommendation for outcome 2A

The Water Forum would like the Biodiversity Working Group to consider the recommendations of the peatlands research above in their planning for the protection of designated areas.

For Outcome 2B: The conservation of biodiversity and ecosystem services in the wider countryside.

Action 2B plans to optimise the benefits to biodiversity in flood risk management planning and drainage schemes by 2027, the Water Forum believes Integrated Catchment Management planning is essential for this outcome. Such planning gives the opportunity for the development of catchment-wide nature-based solutions that can slow the flow and attenuate flood risk.

Currently 11,500 km of Ireland's waterways are managed under the 1945 Arterial Drainage Act that statutorily obliges the OPW to maintain all these water bodies and embankments so that they are free flowing to reduce flood risk and provide adequate outfall for land drainage and urban flood defences. While much of this work may be necessary, the last review of the land drainage policy was carried out by the ESRI in 1982. In its submission to the draft River Basin Management Plan the Water Forum requested a review of the Arterial Drainage Act and it would like to reiterate that recommendation here.

Recommendation for Outcome 2B

The Water Forum believes it is essential that a review of the Arterial Drainage Act and its associated works is carried out to assess the impact on the ecological potential of catchments and to assess its alignment with the Water Framework Directive, Habitats and Birds Directives.

The Water Forum also supports the development of a **national framework and guidance for river restoration** that includes nature-based catchment management solutions as recommended by the [Natural Water Retention Measures Working Group](#). A holistic, catchment-based, multi-stakeholder approach needs to be taken, that will allow for the implementation of measures that support multiple environmental objectives for climate, water and biodiversity outcomes. Adopting such an approach could allow for an integrated approach to funding, technical support, implementation and monitoring.

Outcome 2C: All freshwater bodies are of at least Good Ecological Status as defined under the EU Water Framework Directive.

The River Basin Management Plan for 2022-2027 (RBMP) has not been published yet. In the interim the Water Forum have make a comprehensive submission to the draft RBMP consultation and the recommendations therein should be considered in the development of the National Biodiversity Action Plan.

As pressures on water quality have a direct impact on biodiversity the Forum recommends the following considerations in the 4th NBAP:

Recommendation for Outcome 2C

There should be a high level of ambition in the next RBMP encompassing clear strategies and measures for all at-risk water bodies with identified actions to *protect and restore* ecological status in an outcome-based approach.

An integrated approach needs to be taken whereby multiple benefits for water, biodiversity, air quality and climate change is captured in each of the 46 hydrometric area catchment plans being developed and implemented during the 3rd cycle.

Outcome 2G: Invasive Alien Species (IAS) are controlled and managed on an all-island basis to reduce the harmful impact they have on biodiversity.

Recognising the urgency of developing management strategies for IAS in Ireland, a recent EPA research project on Prevention, Control and Eradication of Invasive Alien Species (Lucy et al 2021) established a suite of practical management strategies for IAS in Ireland.

Furthermore, in 2020 the Water Forum commissioned research to address policy gaps surrounding management of IAS in Ireland, [Invasive Alien Species in the Republic of Ireland: Policy Recommendations for their Management](#), which presented ten recommendations for changes in governance and policy that will, if implemented, radically improve IAS management on the island of Ireland and significantly reduce the threat to native biodiversity and associated forecasted economic costs.

The ten policy recommendations outlined in the research:

1. Establish a suitably resourced, single lead Division that is responsible for Invasive Alien Species (IAS) management in Ireland, working under the aegis of the National Parks and Wildlife Service (NPWS).
2. Establish an All-Ireland IAS Forum.
3. Develop a national Biosecurity Strategy for Ireland.
4. Provide appropriate resources, training and support in relation to IAS for our national Customs services at ports/entry points throughout Ireland.
5. Produce comprehensive Management Plans for IAS currently in Ireland, along with Contingency Plans for IAS expected to arrive in the future (based on horizon scan exercises).
6. Develop a surveillance programme to regularly monitor water bodies for the presence and status of IAS.
7. The new IAS legislation for Ireland that will come into force in 2021 must be implemented and enforced by the responsible agency.
8. Develop national IAS education and awareness programmes in Ireland.
9. Harness community involvement and support to ensure the long-term sustainability of national and local IAS and biosecurity programmes.
10. Significantly increase the level of research and management funding into IAS.

Management of IAS, particularly aquatic species is complex and once established they are virtually impossible to eradicate, such as the Curly waterweed in Lough Corrib or Asian Clam in the River Barrow. The policy IAS research commissioned by the Forum also identified the need to produce comprehensive Management Plans for IAS currently in Ireland, along with Contingency Plans for IAS expected to arrive in the future (based on horizon scan exercises). The EU Regulation obliges member states to carry out comprehensive analysis of pathways and to identify those that require priority action. Only a small number of Priority Action Plans are currently being prepared and urgent action is needed on these. Lucy et al. (2021)¹ outlined the need for a surveillance programme to regularly monitor water bodies for the presence and status of IAS.

While the Forum welcomes the draft NBAP actions 2G1, 2G2 & 2G7 to establish an IAS enforcement unit that will expedite implementation of the legislative and policy framework for management and control of IAS, the timeframe is not ambitious enough, particularly if we aim to meet the **Global Framework on Biodiversity** target to prevent or reduce the rate of introduction and establishment of invasive alien species by 50% and control or eradicate such species to eliminate or reduce their impacts by 2030. Action needs to be taken immediately to prevent further harm.

Recommendation for Outcome 2G

In addition to the draft NBAP actions, the Forum believes a National Biosecurity Strategy should be developed that includes biosecurity guidelines and plans based on international best practice, to encourage good biosecurity practice. An example is the need for biosecurity declaration forms at ports and entry points.

Resources, training and support in relation to IAS for our national Customs services at ports/entry points throughout Ireland should be provided.

¹ EPA Research Report 368: Prevention, Control and Eradication of Invasive Alien Species, Lucy et.al. , 2021 [Biodiversity | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/publications/reports/biodiversity/Biodiversity%20-%20Environmental%20Protection%20Agency%20(epa.ie).pdf)

IAS education and awareness programmes should be developed, such as biosecurity campaigns, along with pertinent materials on codes of practice, protocols for use by all stakeholders (garden centres, supermarkets, anglers, water sports industries etc.

Stakeholder and Community engagement

Considering the climate emergency, biodiversity crises and water quality objectives, many communities and groups across the country are currently actively engaged in action to protect biodiversity and water quality. A top-down approach should be taken to support the bottom-up endeavours of these communities and to learn from what they are achieving locally. More needs to be done to try and harness the appetite for these kind of initiatives on the ground and more support provided for the existing intangible assets possessed by the community and voluntary sector.

Recommendation

Repeating the recommendation, the Water Forum made in its draft RBMP submission, a framework needs to be developed so that local authorities and agencies can work together to support community action planning, project co-creation and implementation to deliver outcomes for water, biodiversity and climate actions in every catchment across the country.

Conclusions

The Water Forum would like to thank you for considering our submission and research reports and hope that our recommendations will be taken on board. We would also be happy to engage with the Working Group or National Biodiversity Stakeholder Forum further should any clarifications be required.

END

***Please address any correspondence to:
Donal Purcell, Senior Executive Officer,
An Fóram Uisce, Civic Offices, Limerick Road,
Nenagh, County Tipperary***