



**SUBMISSION on the new National Parks and Wildlife Service  
Strategy Statement 2023-2025**

**13<sup>th</sup> December 2022**

**Cover letter to:**

Mr Niall Ó'Donnchú,  
Director General,  
National Parks and Wildlife Service,  
90 King Street North,  
Dublin 7,  
D07 N7CV

Dear Mr Ó'Donnchú,

Thank you for the opportunity to make a submission in relation to the new Strategy Statement for the National Parks and Wildlife Service (NPWS) 2023-2025. Our submission, addressing your questions, is below. In addition to this, there are a small number of further points we wished to make which you might consider when formulating your new Strategy Statement.

**1. Outcomes-based Approach**

At a strategic level, the Forum recommends that the NPWS adopts an outcomes-based approach to its work over the next three years with a clear focus on setting, measuring and up-to-date reporting on outcomes for nature and biodiversity. For example, clear targets need to be set for reversing the long-standing deterioration in the status of Ireland's habitats, both within protected areas and more generally across the country. A singular focus on outcomes is needed if we are to drive the transformational changes needed to reverse such declines and to establish the structures needed to protect and restore nature and biodiversity in line with global, European and national commitments. The NPWS needs to be the national body that is leading and coordinating this transformational change and this should be clearly reflected in the new Strategy Statement.

**2. Overall Governance of Nature and Biodiversity Protection in Ireland**

The National Water Forum is concerned at the fragmentation of governance of nature and biodiversity protection and restoration in Ireland and that this has contributed to the ongoing deterioration of the status of both habitats and species. This also has had consequences for water quality as there is a significant connection between the status of habitats and water quality, particularly in relation to water dependent habitats. Ideally, the NPWS would have a leadership role across all nature and biodiversity protection and restoration activities across Ireland and not just in areas protected under EU law. The Forum welcomes the review of the NPWS and the Government commitment to increase resources both within the NPWS and within local authorities through the creation of biodiversity officer posts but is concerned that there may be insufficient coordination and collaboration across and between the various state bodies with a role in nature and biodiversity protection and restoration. The Forum, therefore, recommends that the Strategy Statement addresses the issue of national coordination and collaboration across all State bodies involved in nature and biodiversity protection and restoration with the NPWS taking the lead role in this.

In considering the issue of coordination and collaboration, the National Water Forum recommends that a catchment-based approach be taken to the planning and delivery of actions and change. The catchment is the natural geographic entity within which nature and biodiversity exists and there is a

large body of administrative and scientific knowledge at catchment level in Ireland (for example, the knowledge developed in recent years through the work of the Environmental Protection Agency's Catchment Management and Science Unit) on which the NPWS can build.

### **3. Multiple Benefits**

The National Water Forum, in its recent submission on the draft River Basin Management Plan 2022-2027, drew attention to the interconnections between nature, water and climate action and the potential for achieving multiple benefits where actions are properly planned and coordinated with the objective of achieving multiple benefits. NPWS should place the objective of achieving multiple benefits for nature, climate and water at the heart of its new Strategy Statement so that when actions are being planned and implemented for nature protection and restoration that the impacts on water and climate are also taken into account. Such a commitment will also drive a strategic objective of much better and more effective coordination between the NPWS and the Government Departments and State Bodies responsible for overseeing water protection and management and climate action.

### **4. Public Participation**

As a statutory stakeholder body inputting to water policy, the National Water Forum has called for the development and implementation of a national approach to meaningful public participation when addressing water quality issues, whilst also recognising the connections between water, nature and climate action. The Forum recommends that the NPWS makes the issue of meaningful public participation a cornerstone of its new Strategy Statement and commits to involving the public in a meaningful way in the challenge of protecting and restoring nature and biodiversity in Ireland. The Forum has recently established a working group to consider how such a national approach might be developed and would welcome engagement with the NPWS in relation to the issue of public participation.

Yours sincerely,



Dr Matt Crowe  
Chair

### **An Fóram Uisce – the Water Forum SUBMISSION:**

#### **Mission & Values**

Q1. What do you think should be the core Mission of the National Parks and Wildlife Service

Q2. What core values do you think the NPWS should be guided by?

The Water Forum welcomes the new organisation structure, funding, the new management board and NPWS Strategic Plan for 2023-2025. The NPWS Mission should include a significant contribution to the realisation of Ireland's objectives under the EU Habitats & Birds Directives, National Biodiversity Action Plan, the UN Convention on Biological Diversity and the requirements of the WFD and meeting national Climate Action plans.

## **Key strategic goals**

Q3. Are these the right Strategic Goals and areas of focus for NPWS - is there anything missing?

The Strategic Goals should aim to achieve the NPWS mission.

## **Scientific Advice & Research**

Q4. Looking at the headline functions above, what are the biggest challenges that you think will face the NPWS in terms of Scientific Advice and Research over the next 3 years?

Q5. Do you have views on how these challenges can be met?

Q6. What 3-5 major objectives do you think the NPWS should set in terms of Scientific Advice and Research over the next 3 years?

Where water bodies are within SAC or SPA, then the NPWS has a responsibility to ensure water quality meets the ecological requirements for species and habitats of interest (i.e. those included in the Habitats and Birds Directives). These objectives must comply with the requirements of the WFD. The NPWS should have a clear focus in maintaining the water quality in the few remaining pristine water (Q5) bodies where these are in a SAC or SPA and strive to achieve pristine status in other water bodies where possible.

An assessment needs to be carried out and the measures identified to address the pressures on waterbodies that have been identified as at risk from peatlands in the second RBMP and actions should be carried out to address these issues and to ensure further deteriorations do not occur in waterbodies in peatland catchments.

The Forum suggests that sufficient resources are allocated to start research immediately to build adequate baseline data for the designation of Marine Protected Areas and their management. Interim protections for sensitive sites should be adopted, supported by sensitivity mapping to identify these sites. While acknowledging more data and knowledge is needed in relation to new MPAs the requirements for adequate protection of existing protected areas (SACs, SPAs) also needs to be addressed. Only species protected under the Habitats or Birds Directives are protected at these sites, and they will therefore need to be reassessed to include other species/habitats currently not included. The Forum recommends that management plans for sites already designated as SACs/SPAs should be prioritised.

## **Nature Conservation**

Q7. 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?

Q8. Do you have views on how these challenges can be met?

Q9. What 3-5 major objectives do you think the NPWS should set in terms of Nature Conservation over the next 3 years

A National Strategy for rewetting of peat soils needs to be developed. Implementation of supports to rewet agricultural peatlands or practice change for rewetting must be easy and monitoring and

evaluations must be captured. The Strategy will have to include measures to provide financial supports for farmers to rewet their agricultural peatlands.

The Water Forum commissioned research on the [Management of Peatland for water quality, climate and biodiversity outcomes](#) and the researchers also made a significant number of [policy recommendations for the management of Peatlands in Ireland](#). All activities to rewet, restore and manage peatlands needs to be assessed for compliance with the WFD, while also taking account of the multiple benefits for climate, biodiversity and water.

The NPWS should contribute to the review of the Arterial Drainage Act where this is in conflict with conservation requirements of the water bodies involved, to ensure that conservation requirements are preeminent to the requirements of the Act in order to prevent further habitat degradation.

The development of an effective network of Marine Protected Areas (MPA) is a priority, and NPWS must be central to identifying sites for new MPA, drafting the legislation, and subsequent enforcement of conservation regulations.

### **National Parks & Nature Reserves**

Q10. Looking at the headline functions above, what are the biggest challenges that you think will face the NPWS in terms of National Parks and Nature Reserves over the next 3 years

Q11. Do you have views on how these challenges can be met?

Q12. What 3-5 major objectives do you think the NPWS should set in terms of National Parks and Nature Reserves over the next 3 years?

[No Comment in this section](#)

### **Legislation & Licensing**

Q13. Looking at the headline functions above, what are the biggest challenges that you think will face the NPWS in terms of Legislation and Licensing over the next 3 years?

Q14. Do you have views on how these challenges can be met?

Q15. What 3-5 major objectives do you think the NPWS should set in terms of Legislation and Licensing over the next 3 years?

The Forum recommends the implementation of policies to ensure compliance with relevant regulations and the eradication of deficiencies or conflicts across legislations. Urgent action is required to restore the raised and blankets bog as required under the Habitats Directive.

### **Wildlife Enforcement & Nature Protection**

Q16. Looking at the headline functions above, what are the biggest challenges that you think will face the NPWS in terms of Wildlife Enforcement and Nature Protection over the next 3 years?

Q17. Do you have views on how these challenges can be met?

Q18. 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?

*NPWS have the primary body with responsibility for the implementation of EU regulation pertaining to Invasive Alien Species and according to the Heritage Division Briefing Document 2020 the functional remit of the NPWS includes: Policy in relation to IAS.*

In 2020, the Water Forum commissioned research into the [Management of Invasive Alien Species](#) with a view to informing policy on their control and management in aquatic ecosystems.

- This research reports that Invasive Alien Species are becoming an increasing threat to Ireland's habitat and ecosystems. The [policy recommendations](#) identified a need to establish a suitably resourced, single lead Division that is responsible for Invasive Alien Species (IAS) management in Ireland, potentially within the NPWS. This single lead division would ensure engagement with and coherence across various Government departments (including DHLGH and DAFM), sectors and agencies.
- An All-Ireland IAS Forum should be established which would report to the responsible agencies for IAS in Ireland and Northern Ireland. It will bring together national and international IAS experts, scientists, policy makers, practitioners, and stakeholders to advise both jurisdictions regarding IAS and biosecurity management on the island of Ireland.
- A National Biosecurity Strategy should be developed that includes biosecurity guidelines and plans based on international best practice to encourage good biosecurity practice such as the need for biosecurity declaration forms at ports and entry points. The lack of biosecurity awareness was evidenced with the issues related to the crayfish plague during the second river basin management plan cycle.

Enforcement of Marine Protected Areas: The resources must allow for effective enforcement if MPA objectives are to be met. The policing of existing activities in an area is as important as managing new activities.

## **Engagement & Corporate**

Q19. Who do you think are the most important audiences for the work of the NPWS?

Q20. What do you think are the best ways for the NPWS to reach those audiences?

- For IAS control and management, the NPWS needs to provide appropriate resources, training and support in relation to IAS for our national Customs services at ports/entry points throughout Ireland.
- IAS education and awareness programmes should be supported, 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).
- Meaningful public engagement needs to occur to deliver outcomes for nature, biodiversity, water and climate action and the NPWS should contribute to the development of a new national approach recommended by the Water Forum.

## **Major Cross-cutting & Strategic Issues**

Q21 What do you see as the most important strategic and crosscutting issues for the NPWS over the next 3 years?

Q22. Do you have any other observations that you would like us to take into account when forming our Strategy for the next 3 years?

*Micheal O’Cinneide and Jane Stouts Review of the NPWS highlighted the need for a ‘Multi-level framework for nature, comprising a high level advisory group, a cross-agency technical support team and local level networks’*

The Forum recommends the [Framework for Integrated Land and Landscape Management \(FILLM\)](#) approach is implemented for water and nature management, as this systems-based approach can prioritise actions for water, climate and nature that have the largest synergetic impact. FILLM recommends catchments as the landscape unit for environmental management and as such multi-disciplinary and multi-organisational collaborations are essential to achieve environmental policy coherence, integration and implementation for effective outcomes.

**The O’Cinneide & Stout report also stated that:**

*For Ireland to meet its 2030 ambitions, the policy approach to nature needs to match and link closely with the ‘whole of Government’ actions on climate and water the Forum emphasises the need for this integrated system-based approach.*

*Furthermore, Dr Laura Burke the Director General of the EPA recently stated that: ‘a national policy position on the environment should be put together to ensure environmental issues are looked at holistically. This would not only ensure a joined-up approach to various environmental issues, but also that individual policies did not have unintended consequences.’*