



Response to Draft 3rd National Biodiversity Action Plan

1. Context for this submission

Mountaineering Ireland welcomes the development of the 3rd National Biodiversity Action Plan and the opportunity to respond to the draft plan. Mountaineering Ireland's primary concern in making this submission is that Ireland's upland areas, and their value for biodiversity and society, should have greater prominence in the final version of the Biodiversity Action Plan.

As the national representative body for walkers and climbers on the island of Ireland, Mountaineering Ireland has a particular interest in ensuring the sustainable use of Ireland's upland areas, incorporating mountains, hills, bogland, forests, cliffs and coastline.

Mountaineering Ireland has over 11,800 members, the majority of whom are affiliated through 185 registered clubs. More than 85% of Mountaineering Ireland members regularly participate in hillwalking. Mountaineering Ireland recognises that the upland landscapes which provide the inspiration and the place for outdoor recreation activities are often important habitats and physically fragile, and that recreation activity has an impact on the natural environment. Mountaineering Ireland encourages its affiliated clubs to each appoint an Environmental Officer, and the organisation provides a programme of support including 6 – 10 regional training days each year to encourage best practice and to increase environmental awareness amongst members.

Mountaineering Ireland instigated the *Helping the Hills* initiative in 2012 to raise awareness of the emerging problem of upland path erosion in Ireland, and to establish a coordinated response to this issue with a focus on developing the necessary skills to sensitively repair eroded upland paths (see www.helpingthehills.ie). Mountaineering Ireland also led the National Uplands Working Group which between 2012 and 2014 developed proposals for upland agri-environment measures under the Rural Development Programme 2014-2020. Both these initiatives benefited from involvement by NPWS staff. Mountaineering Ireland has regular contact with many NPWS managers and rangers in relation to recreation management and conservation matters.

It is Mountaineering Ireland's position that Ireland's upland areas are vital natural assets which should be wisely managed for societal benefit through appropriate planning and landowner involvement in a way which ensures ecological integrity and the maintenance of these cherished natural landscapes.

2. The importance of Ireland's upland areas

Within the context of the island of Ireland, mountains and upland areas are very significant elements of the landscape, providing a stable backdrop to a constantly changing urban or suburban environment. The wild or undeveloped character of Ireland's mountains and upland landscapes is a key attraction for recreational users, as well as for domestic and international visitors. The quality of the environment and

the quality of the visitor's experience are inextricably linked, with undeveloped natural landscapes providing the highest quality experiences.

Ireland's mountains and uplands (areas over 150m in altitude) form our largest expanses of semi-natural habitats and are of major conservation importance, with numerous habitat types listed under Annex I of the EU Habitats Directive and many rare and threatened bird and animal species being recorded in these areas. Irish upland habitats include blanket bogs, heaths, flushes and springs, semi-natural grasslands, dense bracken and areas of exposed rock and scree. Over 40% of the total land area designated as Special Areas of Conservation (SAC) in Ireland occurs in the uplands (Perrin *et al*, 2014).

Most of Ireland's drinking water (81.9%) comes from surface water, i.e. rivers and lakes, which in turn have their origin in upland areas (DPHCLG, 2012). These small streams and rivers make up 77% of Ireland's river network, and due to a low level of dilution they are extremely susceptible to pollution (WRBD, 2007). The condition of the natural environment in the catchment around these upland streams and rivers has a direct bearing on the quality of this water and therefore also the cost to treat it.

Ireland possesses 8% of the world's blanket bogs. Although most of these are protected under national and EU legislation, only 20% of this area remains in a relatively intact condition. Peatlands contain a fascinating biodiversity and they hold great value for archaeologists, but perhaps one of the strongest reasons to look after Ireland's blanket bogs is because they store millions of tonnes of carbon and have a vital function in controlling the greenhouse gases that cause climate change.

Recent work by IT Sligo for the Department of Agriculture, Food & the Marine (DAFM) has shown that more than two-thirds of Ireland's High Nature Value (HNV) farmland is in upland areas. However, less than 1% of the land area of the Republic of Ireland is dedicated to nature protection (as national parks and nature reserves); this is below the level of any other European country (EEA, 2015). Most of the land that has been designated for nature conservation in Ireland as part of the Natura 2000 network or Natural Heritage Areas, and the bulk of Ireland's HNV land, is in private ownership. It is important that the Biodiversity Action Plan embraces the potential to enhance biodiversity and habitat condition through working in cooperation with the people who own and manage this land.

Given the importance of Ireland's mountains and upland areas it is Mountaineering Ireland's strong recommendation that the uplands should have more prominence within the Biodiversity Action Plan, perhaps by referring to 'upland habitats' within relevant actions to do with peatland, freshwater habitats etc. Without this it may be difficult to secure the wider policy support needed to address the challenges and ensure sustainable management of Ireland's upland areas in the years ahead.

3. Specific comments in response to the draft action plan

Objective 1 - Mainstreaming biodiversity into decision-making across all sectors

Local Biodiversity Action Plans need to inform practice, especially within local authorities. For example 18 months ago Waterford City & County Council funded a community group to develop a trail in an SAC without any environmental assessment, resulting in a 4 – 5 metre wide roadway being bull-dozed for 3 kilometres along a scenic valley in the Comeragh Mountains. Despite this being reported by Mountaineering Ireland to the local authority, NPWS, Inland Fisheries, An Bord Pleanála and the European Commission the matter remains unresolved.

In another recent situation a non-designated wetland classified as being of national importance through the Wicklow Wetland Survey (2012) was subsequently destroyed by Coillte afforestation, despite the local authority being consulted by the Forest Service when the application was received. In addition to suggesting a need for greater biodiversity awareness this also indicates a need for better sharing of datasets.

Mountaineering Ireland welcomes the commitment to develop legislation to underpin Ireland's national parks (action 1.2.2), and asks to be consulted when this legislation is being drafted. Furthermore, Mountaineering Ireland wishes to highlight the requirement to develop up-to-date management plans for Ireland's six national parks.

Objective 2 - Substantially strengthen the knowledge base for conservation management and sustainable use of biodiversity

Mountaineering Ireland suggests incorporating the mapping of High Nature Value (HNV) land within action 2.1.2.

There is a considerable focus within the plan on marine issues, for example action 2.1.21 recommends research into the threat posed by marine litter, yet there is also need for research into the impact of litter on terrestrial biodiversity.

Objective 3: Increase awareness and appreciation of biodiversity and ecosystem services

From Mountaineering Ireland's perspective this is an extremely important objective with the Action Plan. There is a need for greater public awareness of the importance of biodiversity and how it underpins life. In many ways what is needed is a cultural shift, so that biodiversity is no longer seen as a barrier to development, or a means to sanction a landowner, but rather something that is respected as being of value to society. The greater emphasis on biodiversity within the Tidy Towns programme is helping to make this difference, as is increased wildlife programming on TV and radio; there is scope for more use of social media to build awareness and understanding of the value of biodiversity.

Mountaineering Ireland believes that National Biodiversity Week has the potential to engage the general public with biodiversity, in much the same way that Heritage Week has done so successfully with heritage. Developing and promoting a comprehensive calendar of local events would seem to be key to this; Mountaineering Ireland suggests that the number of Biodiversity Week events be measured as a performance indicator under action 3.1.8.

With regard to consultation with local communities in action 3.1.1 Mountaineering Ireland recommends the inclusion of Public Participation Networks as partners. The PPN is a new mechanism for civic engagement which has been established in each local authority area.

Action 3.1.4 is particularly welcome; Mountaineering Ireland has a number of communication channels available, including a quarterly members' magazine the *Irish Mountain Log*, through which the findings of biodiversity research related to upland areas (e.g. the National Survey of Upland Habitats) could easily be shared amongst people with an interest in these areas. It is essential that such communications are engaging and targeted towards the audience.

Action 3.1.9 is also welcome, though it is concerning that no performance indicators have been attached to this action. Mountaineering Ireland suggests that agricultural advisers, both independent and within Teagasc, could in time become valuable partners in the delivery of this action, but that in the short-term there may be need to improve biodiversity awareness amongst the advisers themselves.

Objective 4 - Conserve and restore biodiversity and ecosystem services in the wider countryside

Mountaineering Ireland is pleased to see the reference to High Nature Value (HNV) farmland and the development of measures to maintain its biodiversity.

Most of Ireland's mountains and upland areas are privately-owned, either by individuals or jointly as commonage. As the primary land-use across most of the uplands is low-intensity farming, agricultural policy will have a major influence on the future management of these areas. Linking farm payments to environmental outputs could provide a mechanism for maintaining Ireland's upland landscapes in condition that is favourable towards their many functions (including agriculture, recreation, carbon storage, biodiversity, tourism and water collection). The locally-led agri-environment schemes currently being piloted by DAFM may provide a means to achieve this but will need to become a more significant strand within the Rural Development programme.

With regard to action 4.1.3 Mountaineering Ireland believes that it is important to specify blanket bog within the areas targeted for peatland restoration, and to separately measure the areas of raised, lowland and upland blanket bog restored. This also links back to action 2.1.23. There may be useful lessons to be learnt from the many peatland restoration projects carried out in the UK.

In relation to Target 4.3 (Flood Risk Management Planning), Mountaineering Ireland draws attention to the relationship between habitat condition in upland catchments and flood risk downstream. Evidence from the UK suggests that measures such as drain-blocking in upland areas can mitigate flooding and also contribute to improvements in biodiversity, water quality, and carbon storage, which in turn can be beneficial for wildlife, human health and wellbeing, recreation, and jobs (SEPA, 2015).

Mountaineering Ireland respectfully requests that NPWS input to the Helping the Hills capacity-building programme be included under target 4.5, or perhaps under objective 6. The initiative aims to build up the skills and understanding needed to deal appropriately with the erosion of upland paths, which without attention will result in further habitat damage. Further information on this initiative is attached.

The wording of action 4.5.4 seems unclear and in the draft plan this action lacks both performance indicators and a timeframe.

Objective 6 - Expand and improve management of protected areas and legally protected species

The development and publication of site-specific conservation objectives for Natura 2000 sites (action 6.1.3) is important and would seem to be an essential step towards the conservation and protection of these areas. Mountaineering Ireland would like to see this action extended to Natural Heritage Areas. The development of conservation measures and a conservation management plan for each site is also required. Mountaineering Ireland appreciates that NPWS may not currently have the resources to fulfil this task but it is difficult to envisage how effective management, and improvement in the status of designated sites, can be achieved without management plans, and the resources to implement them. This resource requirement should be clearly expressed in the Biodiversity Action Plan.

In relation to action 6.1.5, the new Locally Led Agri-Environment Schemes (LLAES) could be instrumental in enhancing habitat condition on upland Natura 2000 sites as these sites face specific challenges associated with topography, weather, limited productivity and consequent land abandonment. These challenges are not addressed through GLAS. Most Natura 2000 sites are privately-owned and to date the farmer's experience and perception of designation has typically been one of restriction and burden. The innovative Burren Farming Programme, where farmers are involved in preparing their own farm plans and where part of their payment is based on the environmental condition of their farm, provides a model showing how biodiversity can become something which farmers are proud of.

Conclusion

Mountaineering Ireland is conscious that NPWS has experienced very significant resource constraints in recent years, and at the same time is facing ever greater challenges in protecting Ireland's natural environment, our organisation remains committed to supporting NPWS in its work, particularly through the engagement of members.

The relatively small area of mountain land in Ireland, especially that which remains in an undeveloped state, is a priceless national asset, valuable for biodiversity, and vital to the physical, mental, recreational, emotional and spiritual well-being of the nation as a whole. It is Mountaineering Ireland's assertion that stronger policy and greater investment are required to protect this vital resource and ensure that it is used in a sustainable way. The National Biodiversity Action Plan has a key role to play within this process.

4. Further information

Mountaineering Ireland would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

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