



NPWS Review – response from Mountaineering Ireland, March 2021

1. Introduction

- Mountaineering Ireland welcomes the current review of the National Parks & Wildlife Service (NPWS) and this opportunity to contribute to that process.
- As the representative body for hillwalkers and climbers on the island of Ireland, Mountaineering Ireland has an interest in the protection and sustainable management of Ireland's mountains, hills, bogland, forests, cliffs and coastline. We also have an interest in promoting responsible enjoyment of these cherished natural landscapes.
- There is therefore complementarity between Mountaineering Ireland's interests and the remit of NPWS, which is reflected in regular contact between our staff/members, and NPWS personnel in head office and across the country.
- Mountaineering Ireland has over 13,900 members, comprising 191 clubs and 2,060 individual members (October 2020).

2. Views on the role, remit, constraints and performance of NPWS (As Is)

- Mountaineering Ireland understands that the formal mandate of the NPWS is to preserve, protect and present Ireland's natural heritage. This is achieved through direct control of six National Parks and a number of nature reserves, and the management of Ireland's nature conservation responsibilities under national and European law and international commitments. This remit requires education and engagement with the public and a wide range of stakeholders.
- There is a low level of enforcement of environmental legislation - NPWS lacks both the resources and necessary legal tools to effectively enforce environmental legislation.
- Much of the success of NPWS is due to the enormous commitment of individual staff, but capacity to deliver on all responsibilities is severely constrained by limited resources. Wicklow Mountains National Park is a particularly striking example where the combination of high visitor numbers and sensitive ground have resulted in widespread path erosion which remains unaddressed, amidst a plethora of other competing issues.
- Continued gaps in the NPWS staff structure mean that it is not unusual to hear of staff covering multiple roles, or for (nominally) protected areas to be without a Conservation Ranger.
- The feedback from people who experience NPWS' education activities is usually very positive, but lack of capacity limits the scope of NPWS's education and public engagement activities. This in turn leads to poor public awareness of our natural environment and of

designated sites and why they are protected. Public discourse regarding designations is often related to constraints on development, rather than the natural heritage that makes these areas special.

- The way in which the NPWS, and with it, natural heritage, has been shunted from one Department to another in repeated government formations suggests that Ireland's natural heritage has low political priority. In addition to triggering costs related to branding and IT changes, this must be demoralising for people working within NPWS.
- NPWS' internal structures seem complex, with four separate directorates, as well as district and regional structures. It can be difficult to identify the person to speak with about an issue and the structure is not easy to understand, e.g. the Education Service, which is delivered through National Parks, is not within the section which deals with National Park management and policy.
- The lack of Management Plans for SACs and National Parks is seen as a major shortcoming. Management Plans are publicly available for only two of our six national parks and these are out of date – there seems to be no reporting of progress against these plans. In their absence, the only plans being developed and implemented at present appear to be those funded by Fáilte Ireland concerned with improving visitor experiences. Current projects in relation to Connemara, Glenveagh and Wicklow Mountains National Parks raise concerns that conservation could become secondary to conservation, especially without the parks having current management plans.
- There are ongoing pressures on SACs including land clearance, illegal burning, off-road vehicle damage, wildlife crime and overgrazing. In addition to capacity issues, the legal mechanisms available to NPWS to address issues seem to be cumbersome, complex and very rarely lead to prosecutions. As a consequence, negative behaviours persist and public confidence in designations and in NPWS diminishes.
- Protected areas are protected on paper only, hundreds of Natural Heritage Areas remain as proposed NHAs, with no legal protection.
- There are significant knowledge gaps and inconsistent practices in relation to recreation management, and in the protection and management of sensitive habitats – while there are pockets of knowledge and expertise this is often not shared nationally.
- NPWS does not have the resources to build and adequately maintain networks with key partners (local communities, NGOs, Comhairle na Tuaithe etc.). For example, Comhairle na Tuaithe, the national advisory body on outdoor recreation has had sporadic input from NPWS, meaning there has been little consideration of the natural environment in Comhairle's discussions and work.

3. Recommendations on the future role, mandate and remit of NPWS (*To be*).

NPWS

- The establishment of the NPWS as an **independent agency**, outside of a Government department, with the authority, resources, staffing and legislative power to protect designated habitats and to be an advocate for Ireland's natural heritage, whilst also facilitating quality outdoor recreation experiences on its own land.
- The public view NPWS as the 'go to' organisation for nature conservation.
- NPWS builds a complete repository of habitat surveys and instigates ongoing monitoring to help guide future management to address the inadequate status of our protected areas.

- NPWS has access to the necessary resources, available on a multi-annual basis, to undertake conservation management and habitat restoration in National Parks and nature reserves, as this type of work has to be a long-term process.
- NPWS acts a centre of excellence for the development and exchange of knowledge on visitor management in sensitive environments, and the protection and restoration of habitats, including building climate resilience, blanket bog restoration and upland path management.
- NPWS collaborates with other members of Comhairle na Tuaithe at national level to advise on the development and management of outdoor recreation, and also collaborates with local authorities and other relevant stakeholders to develop and implement recreation strategies at county level.
- NPWS partners with landowners and local communities to protect wildlife and habitats and to address local recreation needs.
- NPWS collaborates with NGOs (e.g. Mountaineering Ireland; Wicklow Uplands Council), for example to build environmental awareness, help protect Ireland's natural environment and support nature-friendly farming initiatives.
- NPWS is seen as a positive organisation that young people would want to work for.

National Parks

- Ireland's National Parks are widely valued as our premier nature conservation sites, demonstrating best practice in conservation and habitat management, as well as providing quality opportunities for outdoor recreation and for people to learn about Ireland's natural heritage.
- Management plans are in place for all National Parks and nature reserves – these set clear conservation objectives and there is regular monitoring and reporting against objectives.
- There is access to resources to expand our National Parks through strategic land acquisitions when suitable properties become available, and a framework for entering into management agreements with other landowners.
- Visitor management plans for sensitive areas are balanced with habitat protection, on a similar basis to the Sandford Principle used in the UK, ideally this should be enshrined in a legislative framework to underpin our National Parks.
- National Parks have the resources and expertise to implement habitat protection and restoration and effective path management.
- Professional and adequately resourced Education and Ranger services are operating at all national parks.
- There are adequate career paths for park staff – working at a National Park is seen as an attractive career.
- National Parks are seen as integral to their local community.
- An active National Park Council in place for all national parks to facilitate engagement with stakeholders including local landowners and communities of interest, such as Mountaineering Ireland (Wicklow currently has such a group, on which Mountaineering Ireland is represented, but it meets too rarely to be effective).

Environmental enforcement

- Legislation protecting wildlife and habitats is reviewed and updated.
- There is effective enforcement of wildlife and conservation legislation - NPWS District Conservation Officers and Conservation Rangers are adequately resourced and have effective enforcement tools, including fixed penalty notices and cross-departmental support.

- There is effective coordination between all enforcement agencies including NPWS, An Garda Síochána, Local Authorities, EPA, Department of Agriculture, etc.
- While not wishing to see Ireland's natural landscapes marred by signage, if signs at key access points to SACs and other designated sites are required to support enforcement, they should be in place across the country (there are such signs in Wicklow), this could also build public awareness of which places are protected and why.

Education

- NPWS actively promoting public education on the importance and vulnerability of our natural heritage, including engagement with a wider range of groups.
- NPWS regularly using social media to help address pressure on protected areas and to promote responsible recreational behaviour and positive engagement with natural heritage.
- There is widespread public appreciation of biodiversity and the importance of natural habitats in supporting human well-being and in the prevention and mitigation of climate change, flood prevention, waste and air quality etc.

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