



National Biodiversity Action Plan consultation – response from Mountaineering Ireland, November 2022

Response to survey questions:

1. Do you think the **Vision** and **Objectives** capture the major themes/challenges that you see for biodiversity? In other words, if Ireland achieves these Objectives by 2027, would we have made significant progress towards addressing the biodiversity crisis?

Mountaineering Ireland welcomes the development of the new National Biodiversity Action Plan (NBAP) 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 the responsible enjoyment of, and care for, these cherished natural landscapes. Mountaineering Ireland has almost 16,000 members, comprising 189 clubs and 2,900 individual members (October 2022).

Mountaineering Ireland supports the vision and objectives proposed for Ireland's 4th National Biodiversity Action Plan, and we believe that achievement of the vision and objectives would make significant progress towards addressing the biodiversity crisis.

However, the challenges we face to deliver on this NBAP are very significant. In the context of Mountaineering Ireland's interests, the key issues for the NBAP are:

- The poor condition of most of Ireland's upland environments, especially our peatlands;
- The challenge of putting schemes in place to incentivise and enable multiple owners/shareholders to deliver landscape scale improvement in habitat condition;
- The potential for better management of upland landscapes to enhance biodiversity and improve Ireland's resilience to the impacts of climate change;
- Resourcing the restoration of upland habitats;
- Balancing recreation, conservation and other competing land uses.

Arguably the greatest challenge is securing the political support and resources that will be needed to deliver the NBAP.

1. Do you have any comments on the **Outcomes** included under each Objective in the Draft NBAP? Do you feel that these Outcomes adequately address the Objectives under which they are situated? Do any additional outcomes need to be added to meet the objective?

The whole of government, whole of society approach is essential, the impetus and leadership to drive this strategy must come from Government, either from the Department of Housing, Local Government and Heritage, or from the Department of the Taoiseach. The role of the interdepartmental Biodiversity Working Group will be key to the success of the whole of government approach.

2. Are there any **Actions** in the Plan that you feel require amendment? Or indeed, are there additional actions needed? If additional actions are needed, who should implement these actions?

IC3 – the indicator is ‘Incentives for farmers to create habitats for wildlife are in place by 2023’, this doesn’t reflect the language in the action, the indicator should be ‘... create **and maintain** habitats for wildlife...’. It is important to acknowledge the value of existing habitats and reward those farmers who are looking after these well; maintenance should apply to both existing habitats and newly created habitats. IC3 is a crucially important action in the context of the overall strategy, due to the necessity of tackling the key drivers of biodiversity loss, including agricultural policy and practices.

1D – this outcome seeks a 20% improvement in public awareness of biodiversity. In addition to the appointment of a communications expert, the actions should include the development and implementation of a communications plan to achieve higher levels of public awareness. We note there is no deadline given for the appointment of the communications expert, this appointment should be made early in the implementation of the plan. There is no apparent commitment to action a "2023 baseline" for public awareness other than stating there will be one. The action to determine a baseline should be made clear.

1E2 – Mountaineering Ireland welcomes the commitment to provide a legal basis for Ireland’s National Parks, additional actions could be included in relation to National Parks, as per the *Strategic Action Plan for the Renewal of the National Parks and Wildlife Service* (published May 2022), including publication of management plans for each of our national parks.

1E3 – the target of 2030 for increased compliance with Wildlife legislation seems to lack ambition, we are aware that much is already being done in this area and that action 1E1 is a review of wildlife legislation, however we believe that an earlier and more specific target is needed regarding compliance. In many areas there is existing legislation, but it is not often implemented or enforced, either because it is cumbersome, or due to limited capacity within authorities, such as NPWS. Consequently, there is little disincentive to behaviours that are damaging to biodiversity, such as illegal burning, drainage and land clearance. There is also no clarity on the baseline for compliance – this should be clearly stated and should consist of a combination of the number of reported cases as well as number of convictions and there should be a clear commitment to more comprehensive annual reporting of statistics on wildlife crime through which people can both gain awareness and create more transparency. Reporting mechanisms in particular should be made clearer to the public to facilitate more effective reporting and response.

2B1 is vitally important, given the extent to which agricultural policy and practice is a root cause and driver of biodiversity loss. Mountaineering Ireland believes the indicator should relate to

environmental improvement rather than the share of Utilised Agricultural Area (UAA) under management commitments supporting biodiversity conservation or restoration, i.e. it should be condition-based or results-based rather than area-based. Without this approach another five years will pass without significant change in this sector.

2B8 - Mountaineering Ireland welcomes the commitment to having clear actions to enhance biodiversity and cultural ecosystem services in the new National Forestry Strategy and the next Forestry Programme (2024). The measurement of cultural ecosystem services should include opportunities for recreation.

The draft plan seems not to include any commitments from Coillte, Ireland's largest landowner, which controls 7% of our land area. Coillte should be showing leadership by managing its publicly-owned land in a way that works for nature and delivers more of the ecosystem services that we all depend upon. There should be explicit actions and targets in relation to the management of public lands for biodiversity.

3B1 – Mountaineering Ireland welcomes this action which seeks the incorporation of biodiversity considerations in Ireland's National Outdoor Recreation Strategy, with the aim of highlighting the value of cultural ecosystem services and the mental health and wellbeing benefits that come from participation in outdoor recreation activities.

Mountaineering Ireland has co-chaired the Working Group developing the National Outdoor Recreation Strategy (NORS). Protection of the environment is a key consideration in the strategy, with one of five objectives in the draft strategy being:

To protect the environment through better planning and development of outdoor recreation, in keeping with best practice management of landscape and habitats

Mountaineering Ireland suggests that the NBAP should recognise this objective of the NORS, and express the Department's and NPWS' support for contributing to the implementation of NORS.

4C3 relates to the restoration and re-wetting of raised bog Special Areas of Conservation (SACs), and implementation of the National Raised Bog Special Areas of Conservation Management Plan.

Similar commitments are required in relation to the restoration or rehabilitation of blanket bog SACs, the overall status of which was categorised as 'Bad and declining' in the latest (2019) report from NPWS. We note that action 2A2 states that DHLGH will publish detailed site-specific conservation objectives for all SACs and SPAs, however targets for the publication of management plans and a commitment to their implementation are also needed. A great many sites already have site-specific conservation objectives, and have had for several years, but yet have received no real action to address habitat condition. Site-specific conservation objectives achieve nothing without a commitment to measures for their achievement.

3. Biodiversity is not the responsibility of any single body or sector but requires engagement and partnerships across government and communities. As such, the NBAP seeks to promote a '**Whole of Government, Whole of society**' approach to biodiversity in Ireland. In your view, what can be done to further promote public and community engagement around biodiversity under the NBAP?

The major changes in terms of protecting and restoring biodiversity require political buy-in and getting big business and other key sectors such as agriculture on board. The changes that individuals

and community groups can achieve will only be a small part of the magnitude of change that is required to deliver this plan.

Public and community engagement will be enhanced and encouraged when the larger, more significant, necessary action by Government and business becomes evident. This will require rapid change and progress to be demonstrated. Reaching a mid-term review without showing significant progress will likely discourage the public and disenfranchise communities. The final NBAP should clearly demonstrate what action it will take to communicate its progress to the public and how it will respond in the event of non-achievement of targets.

4. Are you (or your organisation) involved in any **initiatives** or work which could be relevant to the 4th NBAP (in terms of informing new actions, providing useful case studies, etc)? If so, please detail below.

Environmental Awareness within Mountaineering Ireland

- Mountaineering Ireland is publishing *Walking With Wildlife*, a series of guides to flora, fauna and habitats in Ireland's upland areas to help build awareness, appreciation and understanding of Ireland's upland environment amongst hillwalkers and climbers, in turn we hope that these publications will lead to action to record and protect biodiversity. For an example of our *Walking With Wildlife* guides, see https://www.mountaineering.ie/files/202210871351_d5a95360.pdf
- Mountaineering Ireland encourages all its clubs to appoint an Environmental Officer to help raise awareness within their club. Mountaineering Ireland provides advice and environmental awareness training for Club Environmental Officers. In April 2022, Minister Malcolm Noonan joined one of our environmental awareness days in the Slieve Bloom Nature Reserve.
- Mountaineering Ireland uses all its publications, both print and online to help increase awareness of biodiversity and related environmental management issues.
- Mountaineering Ireland actively encourages participation in the restoration of upland environments through volunteering initiatives, for example Mountaineering Ireland volunteers are assisting Wicklow Mountains National Park with a peatland restoration project at Barnacullian in the Wicklow Mountains.

All the above actions will contribute towards the NBAP target of a 20% increase in public awareness of biodiversity under Objective 1.

Helping the Hills initiative

In 2012 Mountaineering Ireland launched the Helping the Hills initiative to help raise awareness of path erosion resulting from increased footfall in upland areas, to advocate a considered, quality approach to managing this erosion and to ensure that interventions do not detract from the character of the upland environment. Since 2012, we have hosted conferences and study visits, developed the Helping the Hills Guiding Principles and provided advice and support to many local groups working to repair paths and reverse habitat damage and upland path erosion in their respective areas. To learn more about this work see <http://www.helpingthehills.ie/>.

5. How can we ensure that the 4th NBAP delivers for biodiversity and is **implemented** successfully?

Treat the biodiversity emergency like an emergency – we showed during Covid that major action can be taken quickly, we need to act in a similar fashion in response to the biodiversity and climate emergencies. Several comments above relate to showing real action quickly. This must be represented more fully in the plan and contingency planning included in the event that mid-term review indicates a lack of achievement of outcomes.

6. Do you have any other comments on the current draft of the 4th NBAP?

There is much to welcome in this draft strategy, not least how the strategy outcomes are more clearly expressed than in previous action plans, the provisions in relation to the governance of the strategy and the intention to put the strategy on a legal footing. The draft strategy has the potential to drive the fundamental and extensive changes that are necessary to ensure that Ireland's biodiversity is appreciated, protected and restored but to achieve this requires a level of scrutiny and transparency that has not been shown in the past and will be required to provide assurances and confidence to those bodies, like ours, who are committed to strong biodiversity policies.

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