

Submission to

**Joint Oireachtas Committee on Arts, Heritage, Regional, Rural and Gaeltacht Affairs
for 5 July 2017**

“Preserving Ireland natural heritage is fauna flora and unique habitats”

1. Ireland’s International Role in the Protection of Nature

As we face the sixth, and for the first time human caused, great extinction in global species, there is an imperative for developed countries like Ireland to take leadership on protecting the natural world both at national level, and in international action.

The basis for this was established by the UN Biodiversity Convention 1992 and integrated with the UN Sustainable Development Goals (SDG) in providing under;

Goal 14: “Conserve and sustainably use the ocean seas and marine resources”

Goal 15: “To sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss”

The 2012 UN Rio Plus 20 Conference recognised and gave further status to “*the intrinsic value of biodiversity*” and “*its critical role in maintaining eco systems that provide essential services, which are critical foundations for sustainable development and human well-being*”

2. Irelands place in the age of global biodiversity loss

2.1 The global data

The 2014 and 2016 World Wildlife Fund and Zoological Society of London “Living Planet” reports found that between 1970 and 2012 there was a fall of 58% in the global population of wild animal species and 81% of freshwater species.

The diminution of the global marine environment is overwhelming. A 2015 WWF report established that marine vertebrates including fish fell by 49% between 1970 and 2012.

A 2015 international study "Population Trend of the World Monitored Seabirds 1950-2010" found a 70% decline. The increasing human impact through fishing, waste and chemical release on the ocean eco system remains inadequately understood.

2.2 The State of Ireland's Habitats and Species

The 6 yearly Article 17 Reporting under the Habitats Directive on the status of habitats and species made in 2013 by the NPWS to the EU shows the scale of the challenge facing Ireland.

Of the 59 "Habitat Overall Assessments" only 5 stood at "Favourable" status, 30 "Inadequate" and 24 as "Bad".

Of the habitats identified as having bad status there are clear groupings that stand out: Firstly in relation to peatlands including raised and blanket bogs, wet and dry heaths, and; Secondly for biodiversity rich grassland areas including orchid rich and species rich grasslands, Molinia and Lowland hay meadows and tall herb grasslands.

Of the 61 "Species Overall Assessments" only half were "Favourable". 11 were "Inadequate" including Atlantic Salmon and Marsh Fruitfly with a continued decline of a number of snail species. 6 were "Bad" namely the Fresh Water Pearl Mussel, and its Nore variant, Sea Lamprey, Twait, Shad and Pollan. The Natterjack toad, while listed as bad, was stated to have "genuine improvement" in comparison to previous reporting period.

Updated data is awaited to determine if the major conservation work currently in progress has achieved reversal of the on-going decline of the Freshwater Pearl Mussel. The lack of data on a range of whale species left their status "Unknown".

Agricultural intensification and forestry were identified as the main pressures on terrestrial and fresh water habitats.

For marine fish species, which are not reported under the Habitats Directive the latest figures from the European Commission's Scientific, Technical, and Economic Committee for Fisheries confirm that overfishing continues. According to the most recent updated data, 41% of fish stocks were still being overfished in 2015. Assessment and conservation status data on marine mammals and habitats generally in Irish waters is inadequate.

As a country with 90% of its territorial jurisdiction being in the marine area, there is a particular onus on Ireland to take leadership in marine life protection and the implementation of the EU Marine Strategy Framework Directive.

2.3 Irish National Parks

It should be expected that Irish National Parks would demonstrate leadership in biodiversity enhancement. Irish National Parks are, unlike in other countries internationally, limited to areas under State ownership. It is inexplicable that no legislative basis for Irish National Parks is yet in place.

The management of the Killarney National Park in meeting both IUCN and Unesco Biosphere reserve standards is a source of ongoing concern to Irish NGOs because of the invasive Rhododendron Ponticum and grazing management.

The Glenveagh National Park is being adversely affected by mechanised turf cutting for domestic use bearing no relation in impact to former turbary cutting.

The Wicklow National Park is suffering the impact of past overgrazing where the erosion of deep peat of up to two metres opens gullies creating "hags" which then suffer irreversible erosion, and is failing to control indiscriminate quad bike use.

3. Inadequate Legal and Policy Measures

The first objective stated in the 2017 NPWS Draft National Biodiversity Action Plan (NBAP) is to:

“Mainstream biodiversity into decision making across all sectors”.

This is not happening. Government supported production driven sectoral targets are allowed to drive agricultural, forestry, marine and general land use policy at the expense of natural habitats and other species imperilling the well-being of future generations.

The NPWS operating budget is less than a tenth of Teagasc and half of Bord Bia reflecting the lack of priority given to Ireland’s biodiversity.

There is an unjustified public policy conflict in Ireland between the intensification of agriculture, forestry and marine life exploitation, and the maintenance of the natural environment on which those sectors depend. This is the result of both the lobbying power of vested interests and allowing narrow short term economics to prevail over climate and biological science.

Policy and decision makers, particularly those in the public sector, have a responsibility to understand that the “environment” is not something to address as an afterthought of production based economic targets. The UN recognised concept of “eco system services” provides the conceptual framework for the support of nature, not just for its intrinsic value which must be paramount, but the range of benefits in terms of sustaining all life, water quality, soil fertility, pollination, flood attenuation, carbon storage, recreation and human well-being.

The lack of resources and legal support given to the NPWS is reflected in a poor ambition in its current Draft National Biodiversity Action Plan, with the downgrading of policies and objectives contained in two previous NPWS National Biodiversity Action Plans.

The Draft as published is multiply disappointing. It reveals little coherence, continuity or accountability between the previous two action plans and this one. Far too many of the actions relate to gathering further data instead of clear targeted and timetabled measures and interventions to halt biodiversity loss, based on the substantial evidence which exists on what the critical threats and pressures are, and what needs to be done to address them.

Shockingly there are key actions in the previous plans which have disappeared from the current draft without explanation. The plan, although produced by a public authority, fails to address or demonstrate the policy engagement needed with the other Government departments and agencies in the use of CAP and rural development funding, the promotion of agricultural targets and standards and the regulation of forestry, peat extraction, marine life exploitation and other activities.

The July 2016 earlier draft NBAP under action 6.15.1 stated:

“By 2018, review policy regarding designation of Natural Heritage Areas”. With a performance indicator of “review completed” This sole action in relation to NHAs was removed from the final draft.

The previous NBAP under target 16 recognised that *“some 600 areas proposed as NHA’s in the 1990s have not been protected yet by designation”*. It provided that by 2015 there would be a review of the proposed NHAs to *“designate as appropriate under the Wildlife (Amendment) Act 2000. The full designation of a major part of the 600 proposed NHA’s to*

full NHA status within a defined timetabled period to 2020 with Conservation and Management Plans.”

The Draft NBAP also downgraded action on the Threat Response Plans provided for under the European Habitats Regulations. The initial July 2016 draft of the NBAP contained Action 16.6.1 to *“Initiate species threat response plans where necessary and update as required”*. This was removed from the published draft.

The detailed An Taisce submission on Draft NBAP is on website www.antaisce.org. (http://www.antaisce.org/sites/antaisce.org/files/25012017_an_taisce_submission_re_public_consultation_on_the_draft_national_biodiversity_action_plan_2017_-_2021_-_jan_2017.pdf)

Instead of enhanced biodiversity protection, and overdue upgrading of Proposed NHAs to full NHA designation, with additional protection and resources, the current Government is promoting the misnamed Heritage Bill seeking to amend section 40 of the Wildlife Act to extend the hedge cutting and burning seasons.

The failure to provide the NPWS with the enhanced funding and legislative support to reverse Irish biodiversity loss, can only be a result of subservience to narrow vested lobbying, over the public interest which will have an adverse multi general impact and cost.

There is no current indication that the NPWS will be reconstituted and resourced as an effectively functioning independent agency, provided with the significant additional legal budgetary staff and legal support required.

Furthermore the proposal under Section 1.1.4 of the Draft NBAP to *“strengthen ecological expertise in Government Departments, agencies and local authorities”*, is not underpinned by any meaningful action. An objective in the July 2016 draft for *“Biodiversity Training Material for Government Officials”* was dropped as a mid-term target .

4. Addressing and Reversing the Adverse Impacts on Irish Nature

4.1 Agricultural Intensification

Agriculture is the lead threat to Irish biodiversity.

Current quantity and export driven Irish agricultural targets as set out in Food Harvest 2020 and Food Wise 2025 are in direct conflict with maintaining and enhancing biodiversity, as well as climate mitigation.

Food Harvest 2020 was approved without Strategic Environmental Assessment (SEA). Foodwise 2025 was subject to SEA, so that if monitoring of agricultural intensification shows adverse impacts, which is now clearly occurring, corrective action is required.

The current annual cattle herd increases of 6% per annum is creating renewed water quality pressures in meeting the Nitrates Directive, and the overlapping impact of slurry and fertilizer run off affecting water quality. The most recent data presented by the Dept. of Agriculture at the EPA National Water Forum in June 2017 revealed that 12% of farms with a derogation are failing to comply and of the remaining 130,000 the failure rate is 30%.

The integration of CAP farm support and Rural Development funding with Biodiversity is the overriding requirement. In 2015 An Taisce challenged the Department of Agriculture, Food and the Marine to explain why €400 million of funds allocated under the Common Agricultural Policy were diverted away from supporting marginal farmers and wildlife.

Successive EU funded REPS, AOS and GLAS schemes have not resulted in meaningful impact on Irish biodiversity protection and enhancement, and a complete re-think is required.

The coalition of Irish development NGOs forming “Stop Climate Chaos” and The Environmental Pillar which both include An Taisce have published a report “Not So Green: Debunking the Myths around Irish Agriculture” in 2016.

(Link:<http://www.antaisce.org/articles/not-so-green-revealing-the-truth-behind-irelands-green-image>)

This challenges Government and industry claims on the sustainability of Irish agriculture concluding that “*Overall, Irish agriculture in its current form is damaging to climate, water quality and biodiversity*” and is not contributing to global food security.

It concludes that “*Agricultural intensification has caused significant negative impacts to Irish biodiversity*” It cites the impact of agricultural intensification or inappropriate afforestation causing the “bad” conservation status of a wide range of international Important Irish habitats, the decline of ten key farmland birds and that “One third of Irish wild bees are under threat of extinction”. The treatment of badgers needs to be addressed with the conclusion of a Northern Ireland pilot on TB vaccination assessed.

Irish Agriculture is now using the marketing label of “Origin Green” which is not based on any independent internationally referenced standard, and being promoted as “Climate Smart” merely because the carbon impact is being counted, but not mitigated. The Origin Green label is open to international exposure as “Greenwashing”. Products given the Origin Green label include mushrooms produced with peat compost, sourced from bogs where there has been no Environmental Impact Assessment.

If Ireland is to retain the “green” image which is part of our self-identity this requires a new vision for land management, removing the current conflicts created by agricultural and conifer forestry intensification on water quality and biodiversity. There is an opportunity for water catchment based and area based initiatives for restoring the relationship with land use and nature, including peatland and flood plain restoration, wet woodland and other historic habitat restoration and area based High Nature Value farming for which the Burren Beo scheme forms a model which can be replicated in other locations.

4.2 Peatlands

In 2011 the EPA published a synthesis scientific report “Bogland” on the issues affecting the 20% of the country with peat soil and recommended a range of 39 actions including to protect and enhance biodiversity as well as stopping carbon loss.

The National Peatland Strategy 2015 is entirely inadequate in provision of resources, and timetabling of actions to meet these objectives, and is undermined by its accommodation of peat cutting vested interests for energy and horticulture. It will not achieve the reversal of the overall “Bad” conservation status of peatland and heathland habitats in Ireland’s Article 17 reports.

There is as yet no effective strategy or funded and supported range of actions required for Blanket Bogs and heathland areas which face multiple threats from, burning, overgrazing, invasive species, inappropriate forestry, inappropriate “recreation” such as quad bikes, peat cutting, and rising climate change impacts affecting established rainfall patterns.

While legal action by the EU Commission has resulted in a resourced Conservation Plan being at last put in place for the remaining 1% of Irish Raised Bogs, in conjunction with the turf cutting cessation scheme, this is occurring 15 years after it should have been initiated.

The deliberate burning of land is widespread on commonage and upland areas, affecting designated species and habitats, destroying nesting birds and invertebrates, and causing soil erosion, carbon loss and water pollution. May and June 2015 had some of the worst ever fires including the whole surroundings of Gougane Barra in Cork and a fire extending six kilometres in length in the Cloosh valley in Galway. These fires are all started deliberately for land management and should be classified as wildlife crime, yet no prosecutions occur. Effective action is required; including criminal sanction and removal of farm payment grants for landowners starting illegal fires.

If climate change generates more variable rainfall patterns with longer drier periods in late spring/early summer this is going to increase fire damage risk and impact and erosion. The state of our upland bog and Heath areas has a knock on effect on other species with the national Red Grouse population having fallen by 66% since the late 1960s.

Bord na Mona although advertising itself as “Naturally Driven” has no strategy in place for exiting and the restoration and carbon management of the degraded cut away peatlands. A 2030 target has been adopted for ceasing peat burning electricity, but this extends the use of co firing of peat with biomass which is problematic in its use of imported material, including palm kernels from south east Asia, and the lack of identification of the scale of sustainable indigenous biomass required, as well as the carbon efficiency of mass burning for electricity generation.

Neither Bord na Mona nor the other companies involved in large scale peat extraction for horticulture have adopted an exit date for what is a destructive extractive industry, and the phasing in of alternative sustainably sourced and produced compost products.

Continued peat extraction in all categories of exploitation is occurring without Environmental Impact Assessment, despite a European Court judgment against Ireland in 1999.

A sustainable strategy for Irish peatlands requires large scale engagement with rural communities and the wider public on the multiple benefits of peatland conservation for biodiversity, flood attenuation, carbon storage and amenity. This requires enhanced direction of resources, and timetables and targets for action which are entirely lacking in the content and of the current National Peatlands Strategy 2015

4.3 Forestry

An Taisce has particular insight into the Irish forestry consent and management regime through bring a consultee on the Forest Service application process.

Since An Taisce’s founder Robert Lloyd Praeger raised concern on the developing "regimented rows of conifers" in 1948, Ireland has pursued a continuing policy of non-native conifer plantations with negative impact on biodiversity, landscape, carbon and water quality and causing of soil erosion. The only difference is that new forestry development is now occurring on private land, with the Coillte landholding no longer being expanded. Conifer forestry is also causing increasing concern on social impact in counties like Leitrim.

This continued model conflicts with more sophisticated alternative strategies of supporting High Nature Value farming schemes and restoration of historic native woodland in ecologically appropriate locations. Only 2% of the country is covered by what is native or

semi natural woodland and much of this is highly fragmented. The current forest programme has to date failed to achieve the modest targets set for increasing native woodland and broadleaf cover. Areas with non-intensive farming are also those which are most habitat rich and would benefit most from targeted support actions such as the Burren Beo High Nature Value farming initiative.

The EU and the State is supporting a forestry programme which is not meeting its stated objectives and is creating biodiversity loss rather than biodiversity enhancement.

New forestry development is focused on semi natural habitats associated with low agricultural output. This afforestation is continuing without adequate ecological assessment in breach of the Article 6(3) Habitats Directive requirements for Appropriate Assessment. The need for a full Appropriate Assessment is often screened out and cumulative impacts not properly assessed including on Hen Harrier breeding and foraging habitats. There is a lack of personnel with ecological expertise in the assessment and decision making process.

Drainage to enable plantation, use of herbicides and pesticides and clear felling have a run off effect affecting water quality and ecosystems, including catchments in the vulnerable Fresh Water Pearl Mussel population areas. In Ireland's 2013 report to the European Commission on Habitats and Species, forestry rated as the second greatest pressure and threat on designated habitats and species after agriculture.

Forestry regulations are failing to protect Annex I Peatland habitats such as Wet Heath, Dry Heath, Alpine and Sub Alpine Heath Rhynchosporian depressions, Active Blanket Bog, Rare Grasslands such as Annex 1 Molina Meadows and other species rich grasslands which are being lost in areas like the Comereaghs, Devils Bit and Slieve Blooms.

Semi natural grasslands are important for the Irish hare and range of birds including Lapwing, Curlew and Hen Harrier as well as bees and butterflies. The Hen Harrier in particular has been affected by the loss of its traditional foraging and nesting habitats.

An Taisce has made a detailed submission and recommendations on these issues to the Forest Service through the consultation on the Mid Term Review of the Forestry programme for 2014-2020.

(http://www.antaisce.org/sites/antaisce.org/files/20170502001_an_taisce_submission_mid_term_review_-_forestry_programme_for_2014_-_2020.pdf)

4.4 Ireland's Marine Life

The EU Marine Strategy Framework Directive MSFD provides for a transboundary eco systems based approach to the marine environment. This conflicts with the continued pressure to maximise fisheries quotas under the Common Fisheries Policy over scientific advice on safe levels for individual species stability. Ireland's policy for the marine area "Harnessing our Ocean Wealth" was adopted without Strategic Environmental Assessment and is based on an exploitative rather than eco systems based vision.

The history of Irish marine exploitation is a cycle of over exploitation and collapse of species, only then to move on to the next species. Ireland has lost the once abundant shoals of pilchards, (sardines), mackerel and herring and oyster beds around the coast over the last few centuries. The basking shark was fished to near collapse by the mid 20th century and the angel shark is now endangered.

The internationally recognised fisheries biologist Daniel Pawley has defined the term "shifting baselines" to explain the avoidance of addressing the long term decline of fish and other marine species so that "normal" is seen as an ever deteriorating point of reference with fewer fish and fewer species. Eventually what Pawley defines as "fishing down the food web" leads to tipping points which are reached whereby the larger fish are removed leaving less fertile specimens leading to "trophic cascade" with the breakdown of the marine food web and a diminished marine environment where crustaceans and jelly fish dominate.

Padraig Fogarty the former Director of the Irish Wildlife Trust in his overview of the Irish natural environment published in his book "Whittled Away" in 2017 which states that we need "*a total reorganisation of the way we fish so that marine habitats and species can be restored to their former abundance*". With no fish or vertebrate afforded legal protection under the Wildlife Act of 1976 "*Ireland is the only country bordering the North Atlantic where marine life is not officially acknowledged as wildlife*". He describes the Irish Sea as now "*an ecological wreck , with the fisheries for cod, sole and whittling having collapsed and bottom trawling taking place so that many parts of the sea floor are hauled over up to seven times a shadow of what it once was*".

Irish inshore waters where there is full national legal jurisdiction within the 6 mile limit are facing multiple threats and pressures. Dredging for scallops and clams is continuing in a manner entirely damaging to the sea bed and ultimately destructive to the resource which is being exploited. Bottom trawling generally is irrevocably degrading the sea bed eco system.

New pressures that exploit marine vegetation are being allowed without proper assessment including mechanical kelp extraction in Bantry Bay. The sustainability of all categories of continued aquaculture needs update and review, addressing feed sources, sea floor impact, and in the case of salmon farming lice infestation and interaction with wild species. The continuation of Pacific Oyster cultivation needs to be reviewed because of invasive impact on native species and marine habitats.

The EU Common Fisheries Policy (CFP) has three years remaining to meet the legally binding deadline to end overfishing by 2020. This requires effective member state implementation.

The Marine Strategy Framework Directive, which requires an eco-system based approach to the management of the marine area, provides the means for Ireland to take leadership in marine conservation. This includes the key provisions to designate Marine Protected Areas (MPAs).

MPAs could include location to protect a range of marine species and habitats including the vital feed source for sea birds. The use of MPAs to restrict fishing have been internationally demonstrated to be of major benefit to population regeneration with an impact on areas outside the MPA. Threat Response Plans are required for particular endangered species such as the Angel Shark.

5. Climate Change Impacts - and Mitigation and Adaptation Response

Climate Change poses new threats to the Irish natural environment.

Rising CO2 levels in addition to climate impact, also affect the oceans absorption ability leading to acidification. Warming oceans are changing the migrator and distribution patterns for fish and other marine life affecting the established feed chain and eco system.

The EPA carries out and updates an evaluation of future climate change impacts on Ireland. While overall annual rainfall levels may not change significantly, more variable rainfall patterns could lead to prolonged drier period affecting vegetation and peatlands, and exposing greater risk of fire impact.

At other periods, higher concentrated rainfall is projected to increase flood risk. Milder winters combined with the greater international movement of bio material, increases risk of invasive species propagation and greater risk of exposure to insect pests, fungal and other diseases.

The necessary mitigation and adaptation response to climate change brings new challenges for Irish biodiversity.

Renewable energy development needs to be integrated with biodiversity protection. A number of highly damaging bog slides have been caused by wind energy development. Wind energy development needs to be compatible with peatland conservation and protection of Hen Harrier and other bird species. National guidelines which are not as yet in place are required for the location of solar farm development. Any future wind or solar development on the Board Na Mona landholding needs to be reconciled with ecological rehabilitation of the cut away bogs and well as carbon management. The development of any new bio energy sources needs to avoid any new land use change pressures affecting biodiversity.

Climate change with more variable rainfall patterns combined with rising sea levels and storm conditions will increase flood risk. Flood management needs be considered as part of the overall management of the catchments of the rivers flowing through flood risk urban areas. The response to date in protecting urban areas has been based on heavy engineering and unrealistic demands to “dredge” the Shannon to achieve flood relief.

A 2017 published study, commissioned by Friends of the Earth, Ireland “Natural Flood Management: Adopting ecosystem approaches to managing flood risk” found that natural land management techniques can significantly reduce flood risk but are being ignored by Irish policy-makers, despite evidence of their contribution to flood management around Europe.

<https://www.foe.ie/documents/natural-flood-management-adopting-ecosystem-approaches-to-managing-flood-risk/>

Natural Flood Management is a comprehensive approach to managing soil, wetlands, woodlands and floodplains along a river to retain and slow water at times of flood risk, reducing the speed and the peak of floodwaters compared to approaches that rely only on dredging and walls. The report's author, ecologist and broadcaster, Anja Murray stated at the launch "*Natural flood management has gained recognition in many countries as a viable and cost effective approach to flood risk management, with extensive projects across Europe and further afield that have restored peat bogs, planted riparian woodlands, restored and created new wetlands, re-profiled rivers and their floodplains to hold back floodwaters.*"

6 . Cross Border Issues

Target 7.3 of the Draft National Biodiversity Action Plan 2017-2021 provides for “Enhanced Co-operation with Northern Ireland on common issues”.

Environmental organisations are concerned that Brexit may result in a diminution of nature and environmental protections.

Natura 2000 sites straddle the land and marine boundary with Northern Ireland. Any downgrading of EU Habitats Directive protection would have transboundary impacts and needs to be addressed in Brexit negotiations.

7. The Actions Needed for New Vision for Living with Nature

Public engagement is paramount to address the range of actions needed to enhance our relationship with the natural world. The concept of “eco system” services is neither technical nor esoteric, and provides a means to communicate the benefits of supporting nature, in protecting good water and soil quality, maintaining fish stocks, pollination, flood curtailment, and recreation

Where practices need to be changed, new livelihood opportunities must be identified and supported for those affected. In many cases, the issue causing ecological damage such as scallop dredging is a new practice which is doomed by its nature to destroying the species or habitat which is being exploited. This needs to be clearly communicated to avoid the previous controversies which have been generated by the necessary restriction of salmon drift netting.

There are good community initiatives which can be emulated on the larger scale, the Burren Beo High Nature Value farming programme maintaining cattle grazing in limestone pavement areas, the Monaghan/Tyrone cross border supported Sliabh Beagh Natura 2000 site management project, and the AbbeyLeix community led bog conservation initiative.

1. Targeted, Resourced and Timetabled Plans for Enhancing Habitats and Species

The Birds and Habitats Directives have gone through a major fitness check at EU level and have been endorsed with wide public and political support. Ireland needs to take leadership in it's actions and policies on enhancing biodiversity and addressing the species and habitat actions needed to address the adverse status issued in the Article 17 and Article 12 reports.

2. Make Biodiversity Enhancement an all Government Legal and Policy Objective

For Ireland to enhance the status of the habits and species identified as inadequate and bad, and to mainstream biodiversity this means:

- a) Reconstitution of the legal remit of the Department of Agriculture, Food and the Marine and all agencies under its control as well as other relevant Government agencies or bodies including Bord na Mona to incorporate the UN Sustainable Development Goals including land , marine and avifauna biodiversity.
- b) Reconstitution of the NPWS as a legally effective delivery agency with a National Biodiversity Action Plan 2017 – 2021 with real impact and supporting resources.

3. Integrate CAP and Rural Development Funding with Effective Biodiversity Action

Integrate Common Agricultural Policy, Rural Development funding and the management of a range of other direct and indirect subsidies available for biodiversity action, in particular for integrated area based initiatives combining biodiversity enhancement where appropriate with High Nature Value farming, historic native woodland restoration, carbon soil management and flood attenuation, and recreational amenity.

4. Make Ireland an International Leader in Protecting Marine Biodiversity

Give legal status to the protection of all marine life and habitats. Apply the provisions of the Marine Strategy Framework Directive to take European leadership in marine conservation.

Identify and schedule Marine Protected Areas to restrict dredging, bottom trawling and fishing and allow for fish population renewal and the protection of marine habitats including cold water reefs, and feed sources for marine birds and mammals.

5. Resource Peatlands Management in line with EPA “ Bogland” (2011) Report

Adopt the recommendations of the EPA Bogland (2011) report as the basis for management of peatland areas with an amended National Peatland Strategy supported by the resources and actions required.

6. Integrate Climate Mitigation and Adaptation with Biodiversity

Ensure that new wind, solar, biomass and marine energy development does not conflict with and is integrated with the enhancement of biodiversity.

Adopt river basin flood management based on overall, catchments and restoring flood plains and wet woodlands.

7. Resourcing effective Invasive Species Action

An adequately resourced and targeted approach to combatting invasive species posing the greatest threat to protected habits and species.

8. Cross Border Co-operation on Nature Protection

Ensure maintenance of effective All Ireland co-operation in the protection of habitats and species