An Taisce
The National Trust for Ireland

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National Parks & Wildlife Service,
Department of Culture, Heritage and the Gaeltacht,
90 King Street North,
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Sent by email to: biodiversitypolicy@chg.gov.ie

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Re: Ireland's Biodiversity Sectoral Climate Change Adaptation Plan

An Taisce welcome the drafting of this climate change Adaptation Plan, given the urgent need to reverse the alarming trend of both global and national biodiversity loss. However, we would like to highlight what we view to be shortcomings in the draft plan.

1. Urgency of the plan

Climate change and biodiversity are inextricably linked. Terrestrial and marine ecosystems currently absorb roughly half of man-made carbon emissions[1]. Biodiversity and healthy ecosystems are essential to mitigate against climate change, yet climate change is irrevocably

[1] http://ec.europa.eu/environment/nature/info/pubs/docs/climate_change/en.pdf

damaging those same systems and species. The protection of our biodiversity is a cost effective way and logical way to mitigate against the impacts of climate change. Failure to protect our biodiversity and the further decent in to the ongoing mass extinction will inevitably lead to an ecological tipping point, whereby our natural systems will no longer function as a mitigant for climate change, and we will have lost our main means of combating our rising carbon levels.

Time is against us, and it would appear to An Tasice that the draft Adaptation Plan lacks a sense of urgency. Many of the actions refer to collecting further information, conducting research and carrying out monitoring. While these are all valid, similar to what An Taisce highlighted in our submission on the most recent NBAP plan[2], many of the critical threats are well known, and tackling these should be urgently prioritised over other measures. As outlined in the Stern (2006)[3] report:

> *'No-one can predict the consequences of climate change with complete certainty; but we now know enough to understand the risks.'*

And

> *'Delay makes the problem much more difficult and action to deal with it much more costly.'*

There will already be an extensive lag time in implementing adaptation action before biodiversity responds, and according to the IPCC (2018) report we have less than 12 years to take dramatic action. Existing conservation efforts are entirely insufficient, as evidenced by the Article 17 report from 2013, and the imminent 2019 Article 17 report which An Taisce is given to believe does not present an improved status. While we do need to continue researching climate change, and adapting, there are measures which we know could reverse

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2 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

3 http://mudancasclimaticas.cptec.inpe.br/~rmclima/pdfs/destaques/sternreview_report_complete.pdf

biodiversity loss, and they could be implemented immediately, given enough political will and resources. There is a need to act now with greater vigour.

2. Timetabled and actionable plans

While much of the document pertinently outlines the current threats posed by climate change, An Taisce submit that much of the document relates to how the plan was compiled, but lacks the detail regarding what it is the plan wants to achieve. Table 2 outlines the specific objectives and actions, but the rest of the document deals in generalities.

While Table 2 provides relevant and necessary objectives, the entire document lacks the necessary detail. A vague timeframe is given, but no deadlines are provided. There are no key performance indicators or targets; the lead actors are not identified; and the funding necessary or available for each action is not provided. While An Taisce understand that biodiversity is a cross sectoral concern, the necessary steps which are required should be highlighted by the state agency with the expertise to determine how to address biodiversity loss and resilience in the face of climate change. It is outlined in this document that the actions arising from the plan will require stakeholder support and action, but the specific actions which are required should be clearly spelled out. The people and organisations responsible need to be identified, and made aware of their responsibility, otherwise this plan risks continuing the ongoing 'tragedy of the commons' situation which currently applies to our collective biodiversity resource.

Other Departments will need specific guidance on actions to protect and conserve biodiversity to achieve the objectives of the plan. For example, Action 1.5 is to develop an integrated coastal zone management strategy. An Taisce would very much welcome this, as outlined in our submission on the National Marine Planning Framework[4]. However, we would note that the draft Marine Planning Framework document failed to mention the most pressing biodiversity or climate change concerns, or to recognise ocean acidification, with the predominant focus on the economic resource provided by our seas. It would appear that the

[4] http://www.antaisce.org/sites/antaisce.org/files/an_taisce_submission_on_nmpf_baseline_report.pdf

NPWS did not comment on this draft plan. The DHPLG is listed as one of the actors for Action 1.5, but given that biodiversity and climate concerns were entirely overlooked by the DHPLG in the draft Marine Planning Framework, this action instils no confidence that this will be achieved, particularly given that the NPWS did not engage in the consultation to highlight the plight of our marine biodiversity and environments. As outlined in this draft document, effective biodiversity adaptation requires bottom up and top down planning across all sectors based on coordination and cooperation. Realistically, to achieve this in the current resource driven marine planning and policy framework will require a radical rethink of the entire system. A single action calling for integrated coastal management is effectively meaningless if the most recent relevant policy document entirely overlooked the need for this, and indeed the DHPLG were not called upon by the state agency responsible for Ireland's biodiversity to consider it.

Further, An Taisce would express alarm that Harnessing our Ocean Wealth (HOOW) is referenced in the document as a best practice example of an integrated approach. HOOW is based on an exploitative rather than ecosystems based vision, and the quantity based focus of the document has been highly criticised by environmental NGOs. It adopts the objective of creating a 'thriving maritime economy' and supports 'sustainable economic growth', and it does not address ecological boundaries. Sustainable growth is an oxymoron: growth cannot be sustainable on a finite planet (Daly, 1993)[5]. To laud this as a good approach is concerning, as the plan clearly gives no consideration for the protection of biodiversity, which is the NPWS's main remit. HOOW is in no way integrated with the aims of the NPWS. The first urgent step which the NPWS should be promoting is the establishment of Marine Protected Areas, which are already an action in the NBAP, but which, despite this, would appear to be no closer to being designated.

Another example is Action 1.2, which calls for the enhancement and restoration of natural systems through management to increase resilience. Again, An Taisce would welcome this, and believe that this objective essentially underpins the whole plan. However, having said

[5] Daly, H.E. (1993). Sustainable Growth: An Impossibility Theorum. In H.E. Daly and K.N. Townsend (Eds), Valuing the Earth: Economics, Ecology, Ethics. Cambridge, MA: The MIT Press.

that, one example offered to achieve this is to adapt and restore bogs, and Bord na Mona are suggested as actors. This cannot be achieved while Bord na Mona continue with their exploitative approach. Bord na Mona has no strategy in place for the restoration and carbon management of the degraded cutaway peatlands. A 2030 target has been adopted for ceasing peat burning electricity, but this extends the use of co-firing of peat with biomass. In addition, government documents for the management of peatlands, such as the National Peatlands Strategy, are inadequate because they fail to provide the level of timetabled action, or the provision of resources which would be required to achieve their aims. To achieve any meaningful restoration of peatlands, the Adaptation Plan should call for the management actions set out in the Strive Peatlands document[6] to be implemented. This document outlined targets under seven headings, which include managing of peatland for: biodiversity; carbon climate and archives; water; and other land uses. In addition it outlines the need to manage the state owned peatlands, and that the management of peatlands should involve using socio economic instruments, and that the management should be done both for, and with, the people.

This Adaptation Plan is an instrument of the Climate Action and Low Carbon Development Act 2015, which calls for the preparation of sectoral Adaptation Plans. As such, this plan is a legal instrument, and is subject to judicial review should it be found to be failing in its remit to provide adequate climate adaptation measures.

3. Financing

As correctly noted in the draft plan, the proper implementation of the NBAP would achieve many of the aims of the draft Adaptation Plan. However, An Taisce would highlight that the implementation of the NBAP is failing, as evidenced by the Article 17 reports. If we are to achieve the conservation of our biodiversity under future climate scenarios then serious financial investment will be required. This is currently not the case.

[6] http://www.epa.ie/researchandeducation/research/researchpublications/strivereports/strive75.html

The need for an all of government approach to tackling climate change is well established, but what is needed is an all of government acknowledgment of the dire state of our biodiversity, and its role in providing for climate mitigation and adaptation. Furthermore, we need an all of government realisation that biodiversity conservation needs substantial funding to succeed. We can only hope that the recent Joint Oireachtas Committee report on climate action will facilitate the necessary governmental shift in mind-set which is necessary.

4. Recommendations

1. This Adaptation Plan should have specific and timetabled targets, which are measurable, and for which responsibility can be assigned to a lead agency. It should also indicate what key performance indicators will be used to review the implementation of this plan. Best practice international examples could be utilised to inform this approach.
2. A financial plan should accompany this document. An Taisce are aware of the chronic underfunding of the NPWS, and would highlight that the financial resources necessary to achieve the aims of this plan should be clearly laid out, in order to highlight the extent of the resourcing which will be required. The protection of biodiversity should no longer be an after-thought, given how vital it is for mitigating and adapting to climate change, and the resources required to achieve this should be made obvious to all bodies.
3. This plan is sorely lacking specific recommendations. There are many strategy documents which have already been drafted which the NPWS could draw on in order to promote specific actions, such as those in the Strive Peatlands document, or concrete immediate actions which could be taken, such as the designation of marine protected areas. The plan as stands is too general.
4. The plan should draw on the findings of the Joint Oireachtas Committee report on climate action, where specific recommendations were made in relation to biodiversity, such as promoting the carbon sequestration potential of land through native broadleaf woodlands, maintaining hedgerows and rewetting bogs.

5. DAFM should be required to consult with the DCHG in regard to the reform and implementation of the CAP, to ensure that ecological concerns are given their due consideration. A results based system should be implemented, such as that being championed in the BRIDE project, as the current greening measures are entirely ineffective.

6. Agriculture is the biggest threat to biodiversity, and the biggest emitter of carbon in Ireland. As such, agriculture needs to be specifically targeted in this Adaptation Plan, and the recommendations of the JOCCA report implemented, particularly the need for a more diversified, resilient, sustainable and equitable model for Irish agriculture.

7. Nature based solutions should be prioritised, not just given 'consideration', as called for in Action 4.1. This is particularly relevant to bodies such as the OPW who are tasked with providing flood protection across the country. Climate adaptation carried out by one sector should not undermine the efforts in another, such as hard engineered flood works which damage aquatic wildlife.

8. Implement strict planning scrutiny. The planning system lacks mechanisms which allow climate change considerations to be integrated. Areas, habitats and species which are most vulnerable to climate change impacts should be available as a spatial map for planners to consult, and these areas should be accounted for, and given protection in County Development plans. Any development in these areas should be assessed in a similar way that it would be in a Natura 2000 site. Action 2.1 relates to this, but the difficulties in completing this assessment this were also outlined in Section 5 of the document, leading An Taisce to conclude that this will not be achieved in the near future. However, the habitats which have already been identified as being at serious risk by Coll and Sweeney (2013)[7] should be mapped and integrated into the planning system now, and this layer of vulnerable habitats and species could be updated as the research continues. We submit that this is a fundamental part of any climate Adaptation Plan, and it should be an immediate priority.

[7] Coll, J and Sweeney, J., (2013). Current and future vulnerabilities to climate change in Ireland. Environmental Protection Agency

9. Most of all this plan needs to facilitate immediate and decisive action. The NBAP actions need to be fully implemented before 2021, and the reasons for the lack of implementation of particular measures should be investigated and remedied.

An Taisce would request that you take these recommendations in to account

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