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Páirc Náisiúnta na Mara Ciarraí Public Consultation
Nature Conservation Directorate
National Parks and Wildlife Service
90 North King Street
Smithfield
Dublin D07 N7CV.

Sent by email to: PNMCconsultation@npws.gov.ie

30th January 2025

RE: Pairc Náisiúnta na Mara, Ciarraí, Public Consultation

A Chara,

An Taisce would like to make the following submission on the Pairc Náisiúnta na Mara, Ciarraí.

1. Adequacy of Consultation

In the first instance, we would highlight that the level of information provided to the public in the interests of eliciting their views is very limited. No maps are provided, and the only publicly available maps which we could find are of very poor resolution. No information is provided to indicate what protections already exist on the land, what overlap there is with Natura 2000 sites, what the land use of the area is, and what the current status of the habitats and species in the area is. Without providing a baseline, it presumes those responding have an intimate knowledge of the situation on the ground, and it precludes those without such a knowledge base from meaningfully engaging.

While we welcome the establishment of this new national park, and very much welcome the commitment to seeking the views of the public, in our view this exercise falls short of what is required for meaningful engagement. If future consultations are planned on this, we call on the NPWS to provide a far better baseline assessment, with maps and relevant information. Given the paucity of information provided, we are limited in our ability to adequately answer the questions posed.

2. Owenmore Catchment and Freshwater Pearl Mussel

The proposed national park appears to correspond to the Owenmore Freshwater Pearl Mussel Catchment. There have been a range of assessments, relatively dated at this point, on the pressures in this catchment, with silt and hydromorphological impact being highlighted repeatedly. According to the EPA assessment the Owenmore River is at risk of failing to meet its Water Framework Directive (WFD) objectives by 2027.

The creation of this park provides a key opportunity to put the necessary conservation measures in place which would be of benefit to this highly endangered species, in addition to protecting and improving water quality. This should include consideration of forest to peatland rehabilitation, where appropriate.

3. Baseline Information

In order to draft a credible plan for this new national park, it is critical to initially adequately map and assess what already exists in the area. As a fundamental first step, a detailed data gathering exercise should be undertaken on the range and the conservation status of the species and habitats found within the different sites, both terrestrial and marine. This should include mapping of non-native invasive species, and non-native conifer plantations.

While we appreciate the significant resources required to gather this baseline data from scratch, this data should be gathered from all available sources, including citizen science, the National Biodiversity Records Centre and from any surveys which were carried out for the purposes of planning or licencing (e.g. NIS and EIA assessments related to planning/licencing files).

From that, a prioritisation exercise should be carried out, with a view to ensuring the management plan accounts for the highest priority species/habitats, and allowing for the establishment of habitat corridors, where required. The data gathered should be publicly available (where appropriate), and prioritisation exercise should include public participation. As a first step, EU legally protected habitats and species must be prioritised, in order to reach their legally required site-specific conservation objectives. Likewise, any waterbodies should be facilitated to reach good Water Framework Directive status.

This data gathering exercise should also align with the habitat mapping which will be required for the implementation of the EU Nature Restoration Law. Data on the percentage coverage of certain habitat types and how much is needed to be restored to reach the Favourable Reference Area of the habitat will be required information.

4. Implementation of Measures

While a management plan is obviously key, an implementation plan with a corresponding budget is critical if this national park is to be managed more effectively than other national parks in Ireland. To date, the management of Irish National Parks has been largely ineffective, allowing for the encroachment of non-native species such as rhododendron, and overgrazing by both domestic and non-domestic animals, among other pressures. These same issues undoubtedly impact on this new national park, and will need to be effectively addressed, in a way which they have not been adequately in other national parks. We need a new, effective approach.

5. Public Participation

The involvement of the public in creating a vision and management plan for this national park is critical. However, their involvement should not be limited to sporadic consultations as the management plan is drafted. It's critical that active engagement from the local community is encouraged and facilitated, in both developing the plan and vision, and in the ongoing management of the park. Similar to the incredibly valuable work of Groundwork in the past in Killarney National Park, where they relied very effectively on volunteer effort to work to eradicate rhododendron, a similar model should be considered for this new national park. The local community should be given agency and support to implement appropriate measures which are within their power to deliver.

6. Grazing Pressure

We believe that grazing pressure from growing deer, feral goat and sheep populations requires targeted measures such as fencing, exclusion of farm animals and liaising with Deer Management Units in the local area as established under the National Deer Management Strategy. A failure to proactively prioritise the issue of overgrazing risks a continuation of the issues faced by ecologically significant sites and other national parks across the country, which experience limited natural regeneration capabilities. Achieving a sharp reduction in overgrazing would allow for more effective restoration planting activities within the Páirc, however, these should utilise native flora of local provenance to ensure maximum genetic resilience.

7. Bog Restoration

We note the presence of bogland within the Páirc and would emphasise the importance of assessing its ecological quality, as well as initiating restorative actions to fulfil the requirements of the Nature Restoration Law and the Habitats Directive. Last year, the European Commission referred Ireland to the Court of the Justice of the European Union for failure to protect its peat bogs under the Habitats Directive, demonstrating the importance of bog restoration in this context. This is also crucial due to the carbon sequestration properties of bogland, a critical feature during a time of accelerating climate breakdown.

We submit that close consideration is given to the NPWS's work on Best Practice in Raised Bog Restoration in Ireland (2017)[1] which identifies the main restoration measures for restoration of peat-forming conditions such as drain blocking, removal of planted trees/scrub, installation of marginal bunds, inoculation with Sphagnum, excavation/reprofiling and bunding on high bog. We also recommend examination of the methodologies contained within the National Raised Bog Management Plan (2017-2022)[2].

8. Marine

We note the occurrence of dredging activity within Castlemaine Harbour SAC (site code: 000343) which may induce hydromorphological impacts which should be closely assessed with regard to the nearby Inch Dune ecosystem which is part of the Páirc. This emphasises the importance of protective measures outside of the strictly delineated functional area of the Páirc. A management plan for the marine area of the Páirc should exclude ecologically impactful activities such as dredging, industrial fishing etc.

9. Activities in the Park

The management plan for the park should document what activities are permitted, and in what areas. This information should be publicly accessible online. This should include clear restrictions

on certain activities which are not compatible with the conservation objectives of the area. Strict implementation of any such restrictions needs to be imposed.

We look forward to engaging further as the plan for this Páirc is developed.

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Elaine McGoff, PhD

Head of Advocacy, An Taisce- The National Trust for Ireland.