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

1st July 2026

Re: First public consultation on Ireland's draft National Nature Restoration Plan

A Chara,

An Taisce – The National Trust for Ireland welcomes the opportunity to review and comment on the Draft National Nature Restoration Plan. We would like to make the following observations and recommendations.

An Taisce has worked closely with other eNGOs in drafting this submission, including the Environmental Pillar and the Sustainable Water Action Network (SWAN) (An Taisce is a member of both networks). In our submission we will reiterate, expand and build on some of their points, in addition to making supplemental points.

The urgent need for nature restoration is undeniable given the latest NPWS Article 17 reporting which found that 90% of Irish habitats are in unfavourable conservation condition.[1] The Nature Restoration Regulation offers an important opportunity for nature restoration at scale across the country, while reversing declines in biodiversity, restoring essential carbon sinks, supporting local land custodians in managing for nature and leveraging state lands to achieve our legally binding restoration obligations.

1. Transparent Implementation Framework

We would highlight the importance of clearly articulated implementation measures which are specific, measurable, achievable, relevant and time-bound (both 2030 and 2050). This is essential given that the Nature Restoration Regulation (NRR) contains the overarching objective of restoring at least 20 percent of the EU's land and sea area by 2030 and all ecosystems in need of restoration by 2050, necessitating clear time-bound measures.

[1] https://www.npws.ie/sites/default/files/publications/pdf/article-17-report-2025-volume-1.pdf

2. Independent Advisory Committee Recommendations

We support the recommendations from the Independent Advisory Committee (IAC) on Nature Restoration[2] which should be ambitiously pursued in shaping the Nature Restoration Plan (NRP) and ensuring NRR compliance. This committee was convened with representation across a broad spectrum of relevant stakeholders, with 13 participants from the academic, farming, local government, regulatory, civil society and fishing communities, and was successful in achieving consensus in ambitious recommendations. Furthermore, a nationwide series of Community Conversation workshops and Leaders' Forums were organised to gather further input. This demonstrated a progressive deliberative approach to gathering feedback from members of the public and subject matter experts. We must not repeat the mistakes of the past when a similarly progressive Citizen's Assembly on Biodiversity Loss was convened and issued a host of ambitious recommendations, only for the Irish government to fail to implement or act upon those recommendations.

3. Political Leadership and Inter-Governmental Coordination

There now exists a demonstrable public mandate for engaging in ambitious nature restoration which should be reflected in the NRP, bolstered by the declaration of a biodiversity and climate emergency by the Irish government and local authorities in 2019 and the pressing reality of continued deterioration in biodiversity trends. Strong political leadership is required to steer implementation of nature restoration obligations which has been lacking to date given the lack of ring-fenced funding for nature restoration, failures in implementation of EU and domestic environmental law, and widespread issues in enforcement. It is long overdue for a true whole-of-government approach to be adopted for nature restoration and translated into real action, as expressed in the fifth National Biodiversity Action Plan and referenced throughout the NRP template.

In order to establish political accountability regarding biodiversity restoration, an Oireachtas Committee should be established with oversight of Nature Restoration Plan and National Biodiversity Action Plan implementation. The need for expressed commitments to translate into action is urgent and an accountability mechanism would assist in achieving this by allowing for evaluation of implementation, calling witnesses to demonstrate accountability, producing regular update reports, and monitoring key indicators of progress in biodiversity restoration. The National Biodiversity Forum's remit could also be extended beyond oversight of the National Biodiversity Action Plan alone to include monitoring of Nature Restoration Plan implementation. We also note that the government has established task forces for areas such as accelerating infrastructure delivery. A similar level of ambition for nature restoration is urgently required to ensure that societal and economic progress is balanced with the needs of nature and biodiversity restoration obligations.

Finally, we must also work in collaboration with partners in the Northern Ireland jurisdiction to ensure that transboundary environmental issues and nature restoration actions can be achieved within a collective governance approach. Issues such as the eutrophication of Lough Neagh demonstrate the devastating ecological consequences of a breakdown in governance of transboundary environmental effects.

4. Ring-Fenced and Long-Term Funding for Nature

[2] https://assets.gov.ie/static/documents/873de736/Independent_Advisory_Committee_on_Nature_Restoration_Report.pdf

It is our view that previous commitments from Government regarding nature restoration funding have not been fulfilled due to gutting of nature from the National Development Plan. There was a prior promise by Government to ringfence 20% of the Infrastructure Climate Nature Fund (ICNF) for nature restoration specifically among the farming and conservation sectors. Now no clear funding for nature exists despite the ongoing cross-sectoral negotiations on the NRP. The current Programme for Government frames the ICNF as a means to *"ensure ongoing protection for our environment for future generations."* We are calling for a minimum investment of 463.5 million euro per annum for nature restoration, which was a figure arrived at via NPWS-commissioned research, a very detailed Financial Needs Assessment report[3], which provided the following appraisal of funding for biodiversity:

> *"Government, planning and the business sectors need to realise the importance of biodiversity for the ecosystem services on which we all depend, and the retention of which, combined with investment in nature-based solutions, will be essential to allow us to adapt to climate change. Avoiding future unnecessary costs makes economic sense and should stimulate investment in the conservation of biodiversity."*

The importance of nature restoration funding was also emphasised across the Citizen's Assembly on Biodiversity Loss recommendations. Also, the establishment of a Biodiversity and Nature Restoration Fund was one of the recommendations of the Oireachtas Joint Committee on Environment and Climate Action Report during the previous administration. Since the publication of the National Development Plan, there has been no clarification provided by the government on the reasons why no nature restoration funding has been ringfenced.

The ICNF was promised as a way to ensure security and meaningful investment into nature restoration, particularly for implementing the NRP at farm level. As of the time of writing, there is no clarity for any sector which needs to be urgently rectified. The NRP seeks to benefit everybody, yet no clear funding shows a lack of intent on the part of the government and creates harmful uncertainty. Farmers, for example, need funding which is additional to the Common Agricultural Programme funding, and there is zero clarity on where that is going to come from. This will hinder the ability of important sectors such as the farming community to engage in nature restoration measures on their land. It is likely that the EU LIFE programme is being repealed, so funding for nature is suffering at both EU and national level, requiring urgent ring-fenced funding for nature domestically.

Finally, we would endorse the 'Recommendations for Funding Nature Restoration in Ireland' arrived at by Natural Capital Ireland (NCI) in their report.[4] The 7 overarching recommendations are as follows:

1. Invest in an overarching nature restoration plan and rapidly reform existing infrastructure which has hampered delivery to date and to enable and support those on the ground ready to engage in nature restoration.
2. Rebuild trust in environmental policy and schemes, especially agri-environment schemes. Invest in enforcing existing environmental regulations. Ensure accountability within government Departments or establish an independent Nature Restoration Agency.
3. Mainstream nature restoration and biodiversity via media communications, emphasising the inextricable links between biodiversity loss and the climate crisis. Invest in training and

[3] McGuinness, S.K. & Bullock, C. (2024). Funding Ireland's Future: A Financial Needs Assessment for Biodiversity in Ireland. Report prepared for the National Parks and Wildlife Service and the Irish Research Council. University College Dublin, Dublin.

[4] https://www.naturalcapitalireland.com/_files/ugd/94066f_573327d57bbb4cc4ac53ce781c73d813.pdf

guidelines for journalists and editors to enable more accurate and regular coverage of biodiversity issues.

4. Build capacity in nature restoration skills and natural capital accounting by investing in staff, expertise, education, training and upskilling.
5. Scale-up nature restoration via well-designed pilot projects which can be expanded. Ensure long-term support for successful projects and land custodians to enable sustainable land use management.
6. Ensure multi-annual funding by establishing a dedicated Nature Restoration Fund and/or improve the effectiveness of existing biodiversity expenditure through the EU's Multi-Financial Framework. The tight timeline for the NPWS to deliver on an NRP requires immediate funding to build capacity and co-create with communities. Ongoing monitoring, reporting and verification systems need to be built in.
7. A blend of public and private sector funding is required for nature restoration, as public funding alone will not be sufficient. New fiscal measures such as half a percentage of corporate tax receipts or a levy on profits should be explored for nature restoration. Implement cross-party recommendations from the Oireachtas Joint Committee on Environment and Climate Action Report on the Citizens' Assembly Report on Biodiversity Loss, including investigating a Citizens' Green Bond to support investment in nature restoration, conservation and climate-related projects.

5. Empowering Civil Society - Stakeholder Engagement

Extensive stakeholder engagement has proven key to the success of previous nature restoration projects throughout Europe[5]. Placing greater emphasis throughout the NRP on education, public engagement, and citizen participation is essential to achieving successful nature restoration.

Nature's restoration ultimately depends on physical interventions on land and water, but long-term success requires sustained public support, stewardship, and participation. The EU Nature Restoration Regulation recognises the importance of engaging stakeholders, including landowners, farmers, foresters, fishers and local communities, in the design and delivery of restoration measures. Education should therefore be recognised as a cross-cutting priority of the Plan and embedded throughout its objectives, actions, implementation measures and associated funding rather than being referenced primarily in the context of awareness-raising.

5.1 Education is Key

While Section 10.1.1 acknowledges the importance of raising awareness and engaging schools and communities, Section 4.2.9 highlights capacity building within the forestry sector; a broader and more integrated approach is required.

Education should span the full continuum of societal learning, including primary and secondary education, further and higher education, local and national governance, vocational and professional training, and lifelong learning opportunities for the wider public. Developing ecological literacy and green and blue skills across all sectors will build the knowledge, capacity and public support required to achieve restoration objectives over the long term.

5.2 Commitment to Citizen Science

[5] https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-regulation/success-stories_en

The Plan should also provide a stronger commitment to citizen science as a core component of restoration delivery. Citizen science programmes can make valuable contributions to ecological monitoring while fostering environmental awareness, community ownership, and informed participation. To maximise the potential of sustained investment in training, mentoring, and upskilling, it is therefore essential to ensure quality data collection, sustained participation, and meaningful community engagement.

5.3 Support Small-scale Actions

Alongside large-scale restoration projects, the NRP should explicitly encourage and support small-scale nature restoration in gardens, schools, colleges, workplaces, and community spaces. While individually modest, these actions collectively improve habitat connectivity, contribute to biodiversity recovery and national restoration targets, while empowering individuals and communities of all ages and backgrounds to engage directly in restoring nature. Supporting restoration at multiple scales, from individual actions to landscape-scale projects, will help to build a lasting culture of stewardship across Irish society.

While local small-scale actions are vital to successfully implementing the NRP, a structured, national approach is necessary for managing these actions. This means that the NRP and the responsible national agency provide guidance, support, and training to Local Authorities to centrally manage and support local actions. This will ensure efficient delivery of the NRP, aligning actions with the Plan's goals, avoiding project overlap, maximising available resources, and reducing potential stakeholder burnout.

5.4 Role of Environmental NGOs

To ensure these ambitions are realised, education, communications, community engagement and behaviour change should be embedded within the Plan's objectives, measures and funding arrangements. We recommend that a defined proportion of implementation funding be allocated to education, public engagement, citizen science and community capacity building, with investment provided on a long-term basis rather than through short-term project funding. Sustained funding is essential to enable organisations to develop lasting programmes, build local capacity, and maintain community participation over time.

Environmental NGOs should play a central role in delivering these objectives. Through their well-established relationships with schools, communities, landowners, volunteers and Local Authorities, they are uniquely positioned to build ecological literacy, support citizen science, facilitate community-led restoration and inspire long-term behaviour change. A significant proportion of implementation funding should therefore be directed to environmental NGOs to support the ongoing delivery of education, engagement and restoration initiatives through their established networks and expertise.

5.5 Stakeholder Engagement Recommendations

- Recognise that extensive stakeholder engagement is key to the success of the NRP
- NRP education is required throughout society, including educational institutes, governance bodies, vocational training, professional industry, and community
- Supporting Green and Blue Skills training and upskilling is required across all sectors
- Recognise Citizen Science as a core component of successful restoration delivery
- Investment is required to support Citizen Science delivery, training, and upskilling
- Explicitly encourage and support small-scale nature restoration in gardens, schools, colleges, workplaces, and community spaces
- There must be a structured, national approach to support small-scale actions

- Recognise Environmental NGOs as playing a central role in the delivery of the NRP through their expertise and well-established community support
- Investment is required to support Environmental NGOs and Local Authorities delivery of the NRP

These recommendations align closely with the objectives of Empowering Civil Society and Empowering Our Custodians within the Environmental Pillar's framework for the Nature Restoration Plan consultation. Embedding education, citizen science and community-led restoration throughout the Plan will strengthen implementation, increase public participation and help ensure that nature restoration becomes a shared national endeavour with enduring environmental, social and economic benefits.

6. Full Utilisation of Public Lands for Nature Restoration

It is submitted that the reconstitution of Coillte and Bord na Móna's mandates to enshrine large-scale nature restoration is an essential prerequisite for effective nature restoration, given that these entities account for approximately 8% of Ireland's total land area (525,000 hectares). A legal architecture to achieve this was previously proposed under the last Government within the Climate Action and Biodiversity (Mandates of Certain Organisations) Bill 2023. This proposed legislation should be refined and reintroduced to ensure that commercial operations are balanced with critical biodiversity and climate needs. We also note that the Programme for Government (2025) commits to *"Develop Ireland's Nature Restoration Plan with prioritisation of restoration actions on State lands".* The reintroduction of this Bill would coincide with NRR implementation and the urgent need to activate state lands for restoration.

The untapped potential of Coillte (e.g. Bioclass sites) and Bord na Móna's (e.g. cutover peat areas) landholding for biodiversity is unprecedented in the history of the Irish State. We have the opportunity to restore public lands at scale for nature, public amenity and sustainable development. This is public land, and the Irish people should have a greater say in how it is utilised. If Coillte is to deliver on their own vision statement of balancing the multiple objectives of climate, nature, wood, and people then it is imperative that the legal requisite to prioritise profit via a commercial enterprise is removed. The particularly intensive forestry model which Coillte has employed to date is not compatible with a strategic vision based around the delivery of public goods in the form of climate, nature, people and sustainable development including wood products. Currently, according to the NRP template, Coillte has mapped 112,000 ha of its estate for biodiversity which may require a much higher proportion of the total estate of 440,000 ha to achieve nature restoration obligations. As currently envisaged, this only represents 25.45% of Coillte lands which is likely insufficient and requires much greater ambition.

Similarly, from a biodiversity perspective, Bord Na Móna's peatlands would historically have supported a vast amount of wildlife across a range of raised bog, blanket bog, wetlands, grasslands, woodlands and freshwater habitats. These sites still hold enormous potential for biodiversity under the right management conditions. No information appears to be contained within the NRP template on the amount of hectares within the Bord na Móna estate to be dedicated for nature restoration, above and beyond the peatland rehabilitation schemes mandated under EPA licensing conditions. Bord na Móna needs to demonstrate much more ambition and will to contribute to nature restoration at scale given the vast rehabilitation/restoration potential within their lands and to secure co-benefits of carbon sequestration, biodiversity, nature-based solutions in flood attenuation etc. This also represents an opportunity to move beyond the legacy of degraded peatland habitats abundant in the Irish landscape as a result of industrial peat extraction and to become a leader in nature restoration.

The Citizens Assembly on Biodiversity Loss made a number of recommendations which relate to the mandates of semi-state bodies such as Coillte and Bord Na Móna, thereby giving the Government a strong public mandate to address this. The specific recommendations are:

- Recommendation 116: The remits of Bord Na Móna and Coillte must each be reviewed to include a focus on peatland restoration and rehabilitation projects, with targeted outcomes on biodiversity conservation. The results of these outcomes must be freely available and published annually.

- Recommendation 120: There is a conflict of interest between business aims and corporate responsibility, particularly for State agencies. The State must fundamentally reassess the constitution, goals and operations of Coillte and the 1988 Forestry Act (as amended). This reassessment must ensure biodiversity protection and positive eco-system services are core objectives for Coillte, alongside providing higher quality timber, meaningful employment and benefits to the community.

- Recommendations 121: State-owned woodlands should be recognised and managed as a strategic, long-term national asset for the benefit of the common good.

Consequently, in order to operationalise nature restoration on public lands and adhere to Programme for Government commitments, we recommend that the government issue new letters of expectation to the boards of Coillte and Bord na Móna signalling the imminent reform of their legal mandates. This imperative is reflected in Recommendation 2.5 of the Independent Advisory Committee on Nature Restoration's Report (2026)[6] which should be implemented in full. A summary of this recommendation is provided as follows:

Relevant Ministers should issue updated Letters of Expectation to Coillte and Bord na Móna outlining

i. The amount of public land required for nature restoration purposes and clear direction on the government's expected prioritisation for other competing land and commercial interests. At the time of writing the Government has failed to publish the completed Phase 2 of the Land Use Review.
ii. A commitment to use a portion of annual dividends to the state from Coillte and Bord na Móna operations to fund nature restoration.
iii. Transition management practices in Natura 2000 sites and Natural Heritage Areas from commercial management to management for nature, especially in sites designated for Hen Harrier, active raised bog and blanket bog.
iv. Encourage the expansion of crucial habitats such as ancient and long-established woodlands, native woodlands, peatlands, and areas supporting endangered birds and animals. Areas surrounding Natura 2000 sites should be recognised and managed as high-nature value sites.
v. Develop landscape-scale restoration partnerships with private landowners and local communities, with the State providing technical expertise, access agreements and co-funding for restoration projects.
vi. Issue updated Memorandums of Understanding between State agencies and the NPWS related to nature restoration on State lands, the management of the Natura 2000 network, and the sharing of data/resources aligned with the targets and timelines of the EU Nature Restoration Regulation.
vii. Ensure that the Boards of Directors of these companies include members with specialist expertise in ecology and environmental sciences.

[6] https://assets.gov.ie/static/documents/873de736/Independent_Advisory_Committee_on_Nature_Restoration_Report.pdf

We would also highlight the huge potential for demonstration of ambitious nature restoration across Ireland's national parks, requiring much greater resourcing of the NPWS to deliver management and restoration. Currently, our national park network struggles with issues of overgrazing, invasive species infestation and low management capacity. Prioritising nature restoration measures within our existing national park portfolio (constituting 100,000 ha) could act as best-practice examples for other projects, and after securing effective management, the State could consider further expansion of the network for the benefit of nature, climate and people. This cannot happen without the continued under-resourcing of the NPWS and would be greatly assisted by statutory management plans, which has been committed to by the Minister for Nature to ensure long-term strategic planning of these areas. This is another example of "low-hanging fruit" for nature restoration across State lands and could encourage local land custodians of the present and future.

7. Article 4

Article 4 of the Nature Restoration Regulation is one of the most important sections of the NRR due to setting incremental targets and timelines for the restoration and re-establishment of terrestrial, coastal and freshwater ecosystems. It requires additional habitat restoration for protected species, mandates improved habitat connectivity and subjects restoration measures to continuous improvement and non-deterioration obligations.

According to the National Parks and Wildlife Service's 2025 Article 17 report, the main pressures/threats to Ireland's protected Annex I habitats remain agriculture and other land uses such as extraction of resources, forestry, urbanisation, recreation, and invasive species. Agriculture remains the greatest pressure/threat impacting 69% of Ireland's EU-protected (Annex I) habitats, with High importance for over 50. Intensive grazing/overgrazing (41% of habitats), drainage (29%), and agricultural pollution (27%) dominate. Undergrazing / abandonment also affects 27% of habitats, demonstrating the complex role that diverse changes in agricultural practices continue to play in biodiversity collapse. These agricultural pressures are particularly acute for peatlands and semi-natural habitats.

Alien and problematic species now rank as the second most frequent pressure (51% of habitats, High in 24%), ahead of development/construction/recreation (44%), reflecting the ongoing impact of globalisation, trade and alien invasive species spread (e.g., Rhododendron in woodlands, Spartina in saltmarshes). The impact of recreation also illustrates the increasing demands we are placing on our remaining wild spaces and that even recreational activities can negatively impact on habitats if they aren't managed properly.

Ireland's forestry remains intensively plantation-based (85% plantations, >60% non-native conifers like Sitka spruce), atypical in Europe where semi-natural forests prevail. This model harms peatlands, grasslands, wetlands, coastal habitats, and water quality via acidification, sedimentation, and nutrient leaching. 450,940 ha of peatlands have been inappropriately afforested, including by State bodies such as Coillte. Even protected Natura 2000 sites such as the six Hen Harrier SPAs have been heavily afforested (53% forest cover), resulting in a 54% population decline within the SPAs since 2007. Poor regulation and the failure of the state to carry out urgent habitat restoration has perpetuated the legacy issues in the sector.

Peat soils cover 24% of Ireland (1.7Mha) with our peatlands hosting globally threatened Active Raised Bogs, Blanket Bogs, and Heaths, but 92% of raised bogs remain degraded (<4% actively peat-forming), worsened by ongoing industrial/domestic cutting and drainage. This and ongoing loss of wetland is a major driver in the collapsing populations of one common waders like Curlew, Lapwing

and Redshank. A recent EPA investigation uncovered 38 unauthorised peat extraction sites for the purposes of export[7] and the European Commission has opened up a fresh infringement case against Ireland for failure to comply with the Environmental Impact Assessment (EIA) Directive, especially with regard to sites below 50 hectares where illegal peat harvesting continues to take place in the absence of planning permission or EIA.

Unsustainable land use change and in particular changes in agricultural have reshaped habitats through intensification, land drainage, reseeding and simplification of landscapes, reducing habitat diversity and connectivity. To deliver habitat restoration and re-establishment at scale we must reshape our relationship with the land and our broken food and forestry systems to reverse biodiversity loss and improve livelihoods for farmers and foresters. Many threatened habitats and species remain dependent on farming for their survival and therefore, in many instances, it's a case of supporting the right kinds of farming and space for nature on farms. Lasting change will require more than just a Nature Restoration Plan but a reform of the Common Agricultural Policy and other national and EU policy frameworks.

Article 4(1) of the NRR mandates Member States to implement restoration measures on at least 30% of the total area of Annex I habitat types (terrestrial, coastal, and freshwater ecosystems) not in good condition by 2030, increasing to 60% by 2040 and 90% by 2050. These measures aim to improve habitat condition to progressively achieve good condition across protected habitats.

Article 4(4) requires restoration measures on areas representing at least 30% of the additional surface needed by 2030, 60% by 2040, and 100% by 2050 to reach the Favourable Reference Area (FRA) for each relevant habitat group listed in Annex I. This targets re-establishment where habitats have been lost or fallen below their reference range, expanding and reconnecting them.

Together, these provisions directly tackle the implementation gap under the Habitats Directive (92/43/EEC), by setting incremental, time-bound area-based targets, Articles 4(1) and 4(4) drive measurable progress toward restoring habitats to Favourable Conservation Status (FCS).

The NRP must incorporate robust monitoring and reporting under Articles 4(9) and 4(11) to ensure compliance with restoration targets, continuous improvement in habitat condition, and prevention of deterioration.

Enhanced investment is essential to close knowledge gaps on habitat condition, track restoration effectiveness, and support adaptive management, as required under Article 20's electronic database and GIS-based monitoring systems.

Current bilateral engagement between State, academia and civil society on habitat monitoring is mixed, highlighting the need for early, sustained collaboration on data collection and exchange.

We are supportive of the draft NRP's conclusion that a contemporary comprehensive national habitat map that indicates Annex I habitats and their condition, is required, including the need for improved recording of baseline condition and the use of new technologies, such as remote sensing and machine learning.

Recommendations:

[7] https://www.epa.ie/publications/compliance--enforcement/peat/Peat-Enforcement-Report-2025-(June-2025).pdf

- Establish a dedicated monitoring programme to map habitat condition for 90% of Annex I habitats, integrating Article 17 Habitats Directive data, remote sensing (Copernicus), in-situ sensors, and citizen science, with annual reporting on progress.
- Invest in capacity and expertise through increased funding for NPWS, academic partnerships, and citizen science platforms to ensure early expert engagement and data quality, addressing gaps noted in current bilateral processes.
- Implement continuous improvement tracking under Article 4(11), using indicators of habitat structure/functions to demonstrate trends towards good condition, with adaptive revisions to restoration measures where deterioration risks emerge.
- Promote public data access via GIS portals to maximise transparency, stakeholder input, and compliance verification, aligning with Article 20(8) and (9).

7.1 Misinterpretation of Habitat Groups Approach

Within Article 4 (1) Annex I habitats are described as Habitat Types, relevant groupings of which are sub-divided into Habitat Groups (e.g. Wetlands, Grasslands, Forests). Given the tight timelines involved to 2030 flexibility is given to achieve habitat restoration targets by applying those targets at a Habitat Group level rather than at every Habitat Type. Member States can use this flexibility to prioritize restoration efforts to 2030.

Unfortunately, the lack of precision within the formulation of Art 4(1)(b) means that it could be misinterpreted as allowing this Habitat Groups approach to be utilised beyond 2030. This is not the case however as Member States do not have the flexibility to avoid having to reach FCS, or the need to have in place restoration measures on at least 90% of each Annex I habitat type that is not in good condition by 2050.

While habitat groups might inform initial prioritisation, the text's reference to "area of each group of habitat types" cannot justify offsetting over restoring one habitat to compensate for neglecting another. This strict per-habitat application is essential to achieve Favourable Conservation Status (FCS) for every type, as aggregation would dilute biodiversity goals and evade binding targets.

7.2 Article 4(4) is Strictly Habitat Type Specific

Article 4(4)'s re-establishment targets for Favourable Reference Area (FRA) explicitly apply to "each group of habitat types listed in Annex I," with no textual or recital-based support for broader grouping. Unlike Article 4(1), it lacks even ambiguous phrasing allowing flexibility, making aggregation legally untenable. NRP's must target individual habitats to meet 2030, 2040, and 2050 milestones without conflating distinct types.

7.3 The NRR Complements, Not Replaces, the Habitats Directive

The Regulation builds on Directives 92/43/EEC and 2009/147/EC. Articles 4(1) and 4(4) drive progress toward FRA and FCS per habitat (Recitals 24-36 emphasise this linkage, e.g., Recital 28 on re-establishing to FRA "until... favourable conservation status... is reached"). Interpreting the overall legal targets as aggregated to Habitat Group level would contradict pre-existing obligations, effectively amending the Habitats Directive without legislative basis, something Recital 27 and the Regulation's intent explicitly rejects.
Note: The draft NRP template seems to imply that the Art 4(1) targets can be based on the total cumulative area of habitat types 'not in good condition (6.1.2.2.), and that the Art 4(4) target can be based on the total cumulative area to be re-established to reach favourable reference areas (6.1.2.4.). As outlined above this would imply that the legal requirement to restore Favourable Conservation Status for each Annex I habitat type no longer exists and this is clearly not the case.

Recommendations:

- The National Restoration Plan must clearly outline how the incremental targets for each habitat type will be achieved in order to achieve the overarching targets of achieving Favourable Reference Area (FRA) and Favourable Conservation Status (FCS) for all Annex I habitat types by 2050.

- The utilisation of Habitat Groups to achieve the Art 4(1) targets to 2030 should not jeopardise the achievement of achievement of the Art 4(1) and Art 4(4) targets for 2050 on a habitat type by habitat type basis, or the ultimate achievement of FCS for all Annex I habitats.

7.4 Favourable Reference Area

Robust, transparent FRA calculation is foundational for NRR compliance, Habitats Directive delivery, and scaled restoration to reverse biodiversity loss.

Recommendations:

- Reassess FRA, taking into account the Commission's guidance, the requirements of Art 14(2), based on comprehensive evidence from historical datasets, ecological needs and expert opinion.
- Apply precautionary principle for fragmented/declining habitats (grasslands, woodlands, heaths), ensuring FRA supports connectivity (Art 4(10)), species recovery (Art 4(7)), and climate adaptation.
- Fully document methodological changes since 2019 Article 17, explaining FRA reductions with data, assumptions, and ecological rationale.

7.5 Favourable Conservation Status

Ireland's current approach to the establishment of conservation objectives remains legally and scientifically incomplete because it starts from site-specific conservation objectives (SSCOs) rather than from the higher-level duty to restore protected habitats and species to Favourable Conservation Status (FCS). SSCOs are only a subset of the conservation measures needed to deliver FCS, and they should be derived from Favourable Reference Values at population, national, and where relevant biogeographical scale, not used as a narrow proxy for those obligations. In the case of the Hen Harrier, the current NPWS approach has focused narrowly on the six SPAs and on recent survey data, even though the Nature Directives require a broader assessment of historical range, population viability, habitat restoration potential, and the role of the species across its natural range.

This approach is reiterated in Ireland's draft NRP which states that SSCOs "*define favourable conservation condition at site level by setting targets for relevant attributes for the habitat or species in question. This type of process can also be established outside Natura 2000 sites, using the appropriate attributes for the habitat in question. Such assessments will support national monitoring programmes undertaken for national reporting*."

This approach does not adequately connect site targets such as breeding pairs or productivity thresholds to the achievement of FCS, and that relying on SSCOs alone risks entrenching the status quo rather than setting the restoration ambition required by EU law.

Ireland should adopt Favourable Reference Values and Favourable Conservation Status as the foundation for nature restoration, with SSCOs designed only as tools to deliver those objectives,

alongside explicit restoration targets for habitats and population recovery within and outside Natura 2000.

7.6 Derogation

Within Article 4 a number of derogations are afforded to Member States. The first of Ireland's multi-stakeholder consultation events, the 'Leaders Forum' took place in April 2025. A key recommendation of that forum was that the Irish NRP should be ambitious and inspirational and that the use of derogations should be avoided:

> Ambitious and Inspirational: The plan should be as ambitious as possible, inspiring and motivating collective action across all sectors while committing to no further deterioration of nature. It must achieve **100% implementation with full commitment** and without **avoiding derogations** (emphasis added).

We note that the draft National Restoration Plan proposes to invoke the derogation under Article 4(5) to reduce the level of ambition set out under Article 4(4) in relation to habitat type 91A0 (Old sessile oak woods). We reiterate that, based on consultation with the Leaders' Forum, there is no public support for the use of derogations.

The justification given for the invocation of the derogation is *"high levels of habitat fragmentation and historic deforestation the…lack of suitability mapping…and current low afforestation rates, capacity and consent constraints in the forestry and ecological sectors, it is doubtful that Ireland could reach the 91A0 re-establishment target within the set timeframe."*

Habitat fragmentation is not a barrier to re-establishment given that Old sessile oak woodlands represent the natural ecological climax community across a substantial proportion of the country. There is significant potential to restore this habitat at scale, particularly where key pressures such as overgrazing and burning are effectively addressed. Opportunities for restoration include both upland areas and lands within public ownership.

On the lack of mapping, the Environmental Pillar has previously offered to share GIS mapping and associated data which they have meticulously researched and collated with the NPWS to support the identification of suitable sites on, and adjacent to, public lands for the restoration of this habitat. While this offer of engagement has not been taken up to date, it remains open and available to support the development of the NRP in relation to Old sessile oak woodlands.

The current ad hoc, piecemeal afforestation of private landholdings within the Forestry Programme is clearly not sufficient to restore native woodlands at scale or in an ecologically coherent way. New approaches are needed focusing on landscape scale restoration on public lands and in our uplands in collaboration with landowners and communities.

In line with the wishes of the 'Leaders Forum' the NRP "should be as ambitious as possible, inspiring and motivating collective action across all sectors while committing to no further deterioration of nature. It must achieve 100% implementation with full commitment and without avoiding derogations."

Article 4(2) provides a derogation which allows Member States to reduce the level of ambition for the Article 4(1)(a) and (b) restoration targets, however the derogation only allows the exclusion from the relevant group of habitat types very common and widespread habitat types that cover more than 3 % of their European territory.

Ireland's European territory, as defined under EU law, encompasses both its terrestrial land area and its extensive marine territory (over 400,000 km² within 12 nautical miles, plus exclusive economic zone waters totaling ~880,000 km²). Given that marine habitats dominate this total surface area no terrestrial Annex I habitat type meets the 3% cover threshold. Therefore, Ireland cannot apply this derogation.

We welcome that the draft NRP template indicates that Ireland has not applied for a derogation under Art 4(2). It should be noted that Article 4(2)'s derogation cannot be applied to Ireland's terrestrial habitats, as none meet the "very common and widespread" threshold relative to total European territory.

7.7 Site Selection Based on Sound and Transparent Ecological Criteria

According to Article 4(8) – *"The determination of the most suitable areas for restoration measures…shall be based on the best available knowledge and the latest scientific evidence of the condition of the habitat types listed in Annex I to this Regulation, measured by the structure and functions which are necessary for their long-term maintenance, including their typical species, …and of the quality and quantity of the habitats of the species referred to in paragraph 7 of this Article."*

There are many relevant biodiversity datasets that should be considered when evaluating the best available knowledge and the latest scientific evidence including national datasets such as: Important Bird and Biodiversity Areas (IBAs), Ancient and Long-Established Woodlands, Native Woodland Survey, Irish Peat Soil Map, Art 17 mapping, Irish Semi-Natural Grassland Survey, Wetlands Survey Ireland, RAMSAR, Flora Protection Order etc.

There are also a number of important citizen science data sets that should be considered including monitoring by the National Biodiversity Data Centre, BirdWatch Ireland, Coast Watch Europe and the Hen Harrier Winter Survey.

The selection of sites for habitat restoration and re-establishment must be based on sound ecological criteria, constituting the best available knowledge and the latest scientific advice. This criteria should be made publicly available and there should be transparency around how specific sites were selected.

7.8 Prioritise the Existing Network of Protected Sites for Restoration

While restoration beyond the existing protected network will be necessary to achieve wider ecosystem recovery, focusing initial efforts within the network provides an efficient, ecologically sound and legally consistent foundation for meeting obligations.

Ireland's NRP should prioritise Natura 2000 sites when selecting areas for habitat restoration under Article 4(1). The Regulation explicitly encourages such prioritisation until 2030 (Art 4(1)(b)) and, as reflected in the preamble, recognises the essential role of Natura 2000 sites, particularly where habitats are not in good condition and where legal frameworks already support the long-term effectiveness of restoration measures. Natura 2000 sites were designated using robust ecological criteria and the best available scientific evidence, aligning with Article 4(8). Prioritising these sites therefore ensures a scientifically grounded and coherent approach to restoration planning.

Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) should also be prioritised for habitat restoration under Article 4(1), as these sites were designated under the Wildlife Acts on the basis of their ecological value, including the presence of habitats, species, and geological features of national importance, identified using the best available scientific evidence. As such, their inclusion aligns with Article 4(8), which requires the selection of the most appropriate areas for

restoration. In order to support the restoration of all protected sites the full designation of proposed Natural Heritage Areas (pNHAs) should be finalised and all NHAs should have site specific conservation objectives, site synopses and in time management plans. The lack of full designation and statutory protection of pNHAs since their proposal in 1995 is regrettable and must now be actioned to facilitate nature restoration.

7.9 Achieving Legal Obligations

For some habitat types the size of the restoration and re-establishment targets mean that it will be necessary to implement timely and sustained restoration measures in order to achieve the 2050 targets. In particular, the habitat re-establishment targets for numerous peatlands and native woodland habitat types will require ambitious landscape level habitat restoration that will require urgent interventions to 2030 and sustained efforts to 2050 and beyond.

Ambitious habitat restoration and re-establishment targets for certain habitat types will necessitate the implementation of timely and sustained restoration measures in order to achieve the 2050 targets.

7.10 Additional Habitat Restoration for Species and Habitat Connectivity

Ireland's NRP must address both habitat restoration/re-establishment under Articles 4(1) and 4(4), and the additional species-focused obligations under Article 4(7), which requires Member States to restore habitats of species listed in Annexes II, IV and V of Directive 92/43/EEC and of wild birds under Directive 2009/147/EC. These measures go beyond habitat restoration to ensure sufficient quality and quantity of species habitats, including re-establishment and enhanced connectivity, as reinforced by Article 4(10). While site selection for habitat restoration should be based on both the needs of habitats themselves and protected species, Article 4(7) mandates additional restoration outside these core areas in line with achieving favourable conservation status (FCS) for species and to deliver landscape-scale connectivity. This is why a spatial outline of sites selected for restoration is an essential prerequisite for effective NRR implementation to outline exactly where restoration is to take place; including locally important biodiversity sites, wetland areas mapped by Wetlands Survey Ireland, Natura 2000 sites, pNHAs/NHAs, rivers and riparian zones, nature reserves, linear features on agricultural lands such as hedgerows and treelines etc. An ecological corridor approach is necessary to ensure ecosystem functionality across the landscape by aiding genetic and species dispersal, migration etc.

The draft NRP does not clearly explain how these additional habitat restoration targets will be calculated based on the conservation needs of the species. Simply identifying the overlap between the distribution of species requiring habitat restoration and the areas to be restored under Art 4(1) / Art 4(4) is not sufficient.

Recommendations:

- When identifying habitat for restoration / re-establishment consideration should be given to the conservation needs of protected species. For example, the selection of blanket bogs for restoration should take into account important Hen harrier breeding habitat and likewise the restoration of Native Woodland should take into account the needs of protected species like Lesser Horseshoe bat and rare species like Pied Flycatcher.

- Identify additional species habitat restoration areas under Article 4(7), using data on Important Bird and Biodiversity Areas (IBAs), species distribution records to target areas supporting Annex II, IV, V species and wild birds that require habitat expansion beyond the protected site network.

- Enhance connectivity explicitly under Articles 4(7) and 4(10) by restoring ecological corridors, riparian zones, hedgerow networks, and stepping-stone habitats that link protected sites and support species dispersal, ensuring the functionality of wider ecosystems.

- According to Ireland's 2025 Art 17 report two Maërl species (Lithothamnium coralloides), and Phymatholithon calcareum) are in bad conservation status and should therefore be included in the list of species subject to Art 4(7).

7.11 Prioritising Habitats of Threatened Species

In identifying the most suitable areas for restoration and re-establishment, priority should be given to habitats supporting species that are in need of urgent intervention due to their threatened, declining or rare, conservation status, using the IUCN Red List and Irish regional Red Lists as a prioritisation framework. This should include species assessed as threatened at global, European or national level, and should be combined with data on species distribution, ecological requirements, and connectivity needs, so that restoration delivers maximum benefit for biodiversity recovery and risk reduction.

7.12 Prioritising Sites by Restoration Potential

Where appropriate, sites should be selected for habitat restoration and re-establishment based on their future biodiversity potential rather than solely their current conservation status. This includes degraded areas such as cut-over bogs and plantation forestry sites, which, despite low current biodiversity value, offer high restoration potential through support for Annex I habitats, large-scale habitat creation, enhanced connectivity, and improved quality/quantity of species habitats. These sites often represent socio-economic "low-hanging fruit" with feasible restoration pathways.

7.13 Prioritise the Restoration of Large Areas of Interconnected Habitat

Conservation science consistently shows that large, high-quality, and well-connected habitat areas support greater biodiversity, lower extinction risk, enhanced gene flow, and increased ecological resilience. Most land in Ireland consists of small, often dispersed parcels under private freehold ownership. This makes ambitious landscape level nature restoration challenging, particularly for habitats such as native woodlands which usually require a permanent change in land use from farmland to woodland. Where possible an effort should be made to strategically work with public and private landowners who own large areas of suitable habitat or landowners who collectively manage lands such as commonages. In the public realm this would include bodies like Coillte and Bord Na Móna, while in the private realm opportunities may exist to work with owners of large estates, hill and commonage farmers.

The State should systematically identify public and private landowners holding extensive tracts of suitable habitat, enabling coordinated landscape-level restoration that delivers large, well-connected areas of high-quality habitat.

7.14 Continuous Improvement and Non-Deterioration

To ensure continuous improvement in the condition of Annex I habitats and the habitats of species subject to restoration measures under Article 4, Member States shall under Article 4(11) put in place measures to prevent significant deterioration. In addition, Article 4(12) requires Member States to endeavour to put in place the necessary measures to prevent the deterioration of Annex I habitats that are in good condition or are required to meet restoration targets.

These obligations apply to habitats both within and outside the Natura 2000 network. The commitment in the draft NRP that "*ongoing regulatory measures will continue to be reviewed and improved as necessary*" is insufficient to meet the requirement to put in place concrete measures that ensure continuous improvement. Furthermore, in relation to non-deterioration, Member States must, by the date of publication of the NRP, be in a position to demonstrate that efforts have been made to prevent habitat deterioration.

In light of the clearly identified pressures reported under Article 17, it is incumbent on the Irish authorities to introduce additional, targeted protective measures to address these pressures. This is necessary to ensure both continuous improvement and the prevention of significant deterioration of habitats, within and beyond the Natura 2000 network.

7.15 Strengthen Environmental Protections

Weakening of environmental protections under the guise of regulatory simplification, reduction of administrative burdens and critical infrastructure delivery represents a retrograde move and fails to acknowledge that social, environmental and economic outcomes can be achieved via robust nature restoration implementation.

8. Article 4 Water and Wetlands

For Ireland's water environment, agricultural pressure is again paramount, with nutrient run-off, sediment, pesticides, and drainage causing eutrophication, hydromorphological damage, and declines in high-quality rivers/lakes (e.g., Hard-water lakes 3140 at Bad status). The Article 17 report lists 16 habitats affected by pollution to surface or ground waters from agriculture, including some marine, coastal, upland, fen, lake or other groundwater-dependent habitats. Post-dairy quota intensification has considerably worsened pollution, particularly in the south/southeast as a result of nitrate pollution. We need evidenced based measures to reduce nitrate pollution- An Taisce has long been critical of the approach and measures proposed in the Nitrates Action Programme, highlighting that the measures have no evidence base and are unlikely to be effective for adequately preventing nitrogen leachate, and thus in breach of EU law. The Article 17 report repeatedly highlights that the current measures are inadequate for meeting the conservation requirements of various habitats and species. For example, in regard to 1130 Estuaries the Article 17 report highlights:

> '*Measures aimed at reducing diffuse pollution to surface and ground water from agricultural and residential activities (MA09, MA10) aim to improve water quality in estuarine waters; however, existing interventions appear insufficient to fully address the pressures impacting this habitat.*'

For habitat 3110 Oligotrophic lakes the Article 17 report highlights that the current agricultural measures lack the necessary evidence base:

> '*significant focus is being placed on as yet unproven source control measures (e.g. increased slurry storage) and pathway interception measures (e.g. buffers) rather than source reduction measures. There is also a general lack of sufficient information on nutrient sources (in terms of field-scale livestock density and applications of chemical fertilisers and slurry) and nutrient pathways (in terms of drainage channels and pipes) to develop targeted source control measures such as detailed nutrient management plans*.'

In regard to the adequacy of relying on Water Framework Directive compliance for achieving conservation objectives, the Article 17 report says this in relation to 3110 Oligotrophic isoetid lake habitat (with similar commentary for other habitats and species):

> '*Implementation of the Water Framework Directive (WFD) in Ireland does not currently integrate the water-related ecological requirements of water-dependent Annex I habitats or Annex II species into its objectives and programmes of measures*'. It continues: '*An overall WFD high ecological status objective does not guarantee Favourable conservation condition for the habitat as targeted WFD standards do not currently exist for the other key requirements including water colour and DOC. Protecting and restoring 3110 lakes requires that the habitat's ecological requirements are included within WFD waterbody objectives, as a minimum for known sites within the 28 SACs designated for its protection*'.

As such, in order to comply with the freshwater element of Article 4, it is insufficient to rely on the extant programmes, such as the Nitrates Action Programme and the River Basin Management Plan, as they do not provide the necessary species or habitat specific levels of protection which are necessary to bring them back to favourable conservation status.

In addition, we need continued investment in wastewater, along with far stronger enforcement. The EPA's Urban Wastewater Treatment report from last year stated that Uisce Eireann consistently failed to meet licensing standards in over half (59%) of its active wastewater discharge licences in 2024. Over 40% of these failures were due to operational and maintenance issues, so nothing to do with infrastructure upgrades. There should be a zero tolerance approach to this, with swift legal sanctions by the environmental regulator, EPA to halt pollution from these widespread sewerage failures.

The vast majority of Annex II species listed in the Habitats Directive that come into the scope of Art 4(7) are dependent on freshwater habitats, while at least sixteen of the bird species that come into the scope of Art 4(7) are associated with freshwater habitats. There are also a number of Irish habitat types within Group 3: River, lake, alluvial and riparian habitats, that fall within the scope of Article 4. Therefore, in order to meet the obligations of Art 4 Ireland's NRP should have a dedicated suite of actions targeting the main threats and pressures facing wetlands and in particular freshwater habitats and species. Wetland restoration should focus on the common pressures identified in the Art 17 report for freshwater species. These actions should be delivered at catchment scale, and complemented by species-specific measures.

Recommendations by common pressures on freshwater species:

- Improve water quality across freshwater catchments - As water quality is a recurring pressure across the freshwater species the NRP should prioritise reducing nutrient, sediment, and pollutant loading from agriculture, wastewater, and other diffuse sources. This must be evidence-based, and should be framed at catchment scale, not only at protected site scale, so that upstream activities are addressed alongside habitat restoration. Important for Freshwater pearl mussel (Margaritifera margaritifera), Atlantic salmon (Salmo salar), Pollan (Coregonus pollan), Slender naiad (Najas flexilis).
- Restore natural hydromorphology and flow regimes - The NRP should protect and restore hydromorphology of rivers including by tackling drainage, abstraction, and 39 other alterations to water movement. This is especially important where species depend on clean, stable, or seasonally dynamic water conditions. Freshwater Pearl Mussel, for example, are particularly sensitive to hydrological fluctuations in their habitat.
- Reconnect rivers and remove barriers - For migratory freshwater species, the NRP should prioritise barrier removal, fish passage, and longitudinal connectivity. Connectivity measures should be prioritised for the most important sites for migratory species, linking spawning,

nursery, and adult habitats. Actions delivered under Art 9 should be linked to the Art 4(7) and Art 4(10) requirements for Annex II species. Important for River lamprey (Lampetra fluviatilis), Sea lamprey (Petromyzon marinus), Twaite shad (Alosa fallax), and Atlantic salmon (Salmo salar).

- Lateral connectivity is also a key element, and should not be overlooked, with riparian and floodplain connectivity being a critical element of natural hydromorphological function.
- Restore and protect habitat structure - Riparian zones, riverbeds, lake margins, flushes, ponds and temporary wetlands should be restored and protected where habitat degradation is limiting species recovery. Habitat restoration should also address sedimentation, channel modification, and loss of open wet habitat.
- Build in biosecurity and invasive-species control - Where species are vulnerable to invasive species or disease, restoration actions must include biosecurity safeguards and targeted control measures. This should be treated as a core implementation requirement rather than an add-on. Important for White-clawed crayfish (Austropotamobius pallipes).

9. Agriculture

The majority of Ireland's land area is comprised of agricultural lands, both private and commonage, constituting 74% of total land area. As a result, farmers are essential custodians for nature restoration and require enhanced incentives such as agri-environment schemes to assist with viability and land succession, both of which are big challenges faced by the farming community in Ireland. Additionally, agri-environment schemes have undergone some reputational damage among the farming community and need to be improved to ensure buy-in. The Nature Restoration Regulation represents a unique opportunity for farmers to be rewarded for nature stewardship and enhancement via results-based, voluntary agri-environment schemes which complement traditional funding structures such as the Common Agricultural Policy (CAP).

This can only be achieved through the creation of a ringfenced Nature Restoration Fund established at EU level and domestically to support voluntary farmer uptake of measures within the Nature Restoration Regulation. The Irish Government should also support full retention of the EU LIFE Programme which is under threat within the next EU Multi-Annual Financial Framework, and is an essential driver for innovation and investment in results-based agri-environment schemes. The importance of consistent and long-term funding streams with embedded continuous monitoring, progress tracking and adaptive management is essential to realisation of long-term land custodianship by farmers and to reward them for sustainable land-use practices.

It is essential that farmers and rural communities are active collaborators in shaping and implementing nature restoration. Communities and landowners must be involved in decision making through early and sustained engagement. Wherever possible management interventions should look to deliver multiple environmental and social benefits and reward practitioners for the ecosystem services provided.

Ireland must properly resource key agencies (NPWS, DAFM, Teagasc, and AKIS/EIP-AGRI) to provide the support farmers need to restore agricultural ecosystems.

Authorities should provide clear guidance for farmers on the implications of different nature restoration measures for their eligibility for basic payments.

It is imperative that the post-2027 Common Agricultural Policy integrate fully with the Nature Restoration Regulation, particularly Article 11, to meet binding restoration targets for agricultural ecosystems while balancing climate adaptation, rural socioeconomic needs and sustainable

production. Any backsliding on environmental protection in the CAP would seriously undermine the objectives of the Nature Restoration Regulation (NRR) and must be avoided.

Ireland's future CAP Strategic Plans should explicitly align with Ireland's NRP, leveraging CAP's important role in funding farmers to deliver habitat restoration on agricultural lands. The CAP Strategic Plan should be monitored using key performance metrics that are aligned with the NRR, e.g. the conservation status of habitats, the grassland butterfly index, the quality and quantity of landscape features such as hedgerows.

We are supportive of the selection of (a) grassland butterfly index; (c) share of agricultural land with high-diversity landscape features, as key indicators for agricultural ecosystems under Article 11(2) of the NRR. The selection of these indicators will better monitor trends in farmland biodiversity and are complementary to other targets. To improve biodiversity in agricultural ecosystems, including pollinators and farmland bird populations, Ireland must also move beyond merely protecting existing habitats and recognising their presence under Space for Nature Ecoschemes. It should instead actively enhance habitat quality through a combination of regulation, targeted incentives, and farmer education.

Conditionality and agri-environmental measures in Ireland's CAP Strategic Plan post 2027 must ensure that enhanced protection for land scape feature in tandem with incentives to encourage the creation of new farmland habitats will in combination deliver increasing trends.

The Irish government should advocate for mandatory ring-fencing for environmental and climate measures in the CAP 2028-2034 framework, reversing the Commission's proposal to eliminate it.

The Irish government should advocate for the retention of robust environmental conditionality, rejecting the dilution of Good Agricultural and Environmental Conditions (GAECs) into a flexible "farm stewardship" model that risks a race-to-the-bottom. Maintain EU-wide baselines for soil health, landscape features, water protection, and permanent grassland safeguards (e.g., no ploughing in Natura 2000 sites).

DAFM must urgently finalise its long-overdue review of the EIA Agriculture Regulations (SI 456/2011). The review of the EIA (Agriculture) Regulations, was initiated in June 2023, to address critical gaps exposed since the 2011 regulations were introduced following the 2008 EU Court judgment in Case C-66/06 *Commission v Ireland*. Current regulations are insufficient to protect semi-natural habitats and landscape features such as hedgerows which are frequently intensively managed to the detriment of their ecological function, often within the prohibition period within the Wildlife (Amendment) Act 2000.

DAFM should eliminate the 500m screening threshold for hedgerow removal and ensure that all landscape features are strictly protected as a condition to CAP payments. This would align national policy with the NRR requirement for increasing trends in the share of agricultural land with high-diversity features like hedgerows and the CAP GAEC 8 requirement for the retention of landscape features for all direct payment recipients.

Agri-Environment Measures and habitat restoration should also prioritise the need to restore populations of rare/specialist species taking into account the requirements of Article 4(7), the Birds Directive and Ireland's Prioritised Action Framework.

9.1 Soil Management and Rewetting

The targets within NRR Article 11(4) to restore and rewet drained peatlands and organic soils under agricultural use present an opportunity to collectively improve the management of peatlands and organic soils as a nature-based solution to halt biodiversity loss, support climate change adaptation, resilience and mitigation all the while supporting the wellbeing of communities living in peatland landscapes. The obligation is to put in place measures which aim to improve the management of organic soils in agricultural use constituting drained peatlands; with two separate incremental targets set for implementing restoration measures and rewetting. The scope of the land area nationally covered by these targets is based on the area of organic soils in agricultural use constituting drained peatlands, without distinction based on drainage effectiveness.

This element of the NRR disproportionately dominated the national debate on the adoption of the NRR. While the idea of rolling back on generations of land management is understandably an emotive issue, it is our assessment that in fact the NRR's targets are overshadowed by the scale of necessary ambition emanating from national climate policy. At a national level there are numerous policies such as the Ag Climatise Road Map and the Climate Action Plans which have established targets for reduced management intensity and rewetting of organic soils. The EPA synthesis report of Phase I of the Land Use Review found that only scenarios that included ambitious organic soil rewetting (up to 90% of drained organic soils considered) achieved net zero by 2050. These national targets are linked to addressing greenhouse gas emissions from organic soils and, unlike the NRR, have no offsets.

The issue is, therefore, not whether water table management on organic soils is necessary but how we can utilise the momentum created by the NRR to address the concerns of farmers and peatland communities, and what measures need to be taken to encourage participation in voluntary schemes.

Based on the work of Tuohy et al (2023) DAFM have created a new category of land that they have named "rewetted area". Claiming that poorly drained land is "rewetted" would greatly reduce the scope of the level of their ambition under the NRL. Such a position would run counter to the NRR's legal obligations. Under the NRR, rewetting is defined based on the 2006 IPCC Guidelines for National Greenhouse Gas Inventories[8], "*Rewetting is the deliberate action of raising the water table on drained soils to re-establish water saturated conditions, e.g. by blocking drainage ditches or disabling pumping facilities*". This distinction is highlighted in the EPA's most recent National Inventory of Greenhouse Gas Emissions which states that the Tuohy et al (2023) categorization of drained land is "*separate to the rewetting of organic soils as described in the IPCC Wetlands Supplement*."

Therefore, the scope of the NRRs obligations are all organic soils in agricultural use constituting drained peatlands, and rewetting is an intentional progressive land management process rather than a defined water table height. Only fully rewetted soils should be excluded from the requirements of Article 11(4). There remains a major discrepancy between the area reported as drained organic soils in agricultural use constituting drained peatlands nationally and the figures included in the draft National Nature Restoration Plan 2026. These have been outlined on p. 71 of the Environmental Pillar submission in Table 1 and 2 and require rectification and integration into NRP formulation.

The NRP must base the national target for the management and rewetting of organic soils on the legal requirements of the regulation, not on definitions created by DAFM/Teagasc that are not aligned with the NRR.

In order to achieve the 2050 target across 339,000 ha of land Ireland would need to rewet 23,494ha in addition to the 33,000ha that will be achieved through the rehabilitation of peat extraction sites by 2030. Ireland also has ample opportunity to deliver additional rewetting though the restoration of afforested peatlands in public ownership and existing policy commitments within the National Climate

[8] https://www.ipcc-nggip.iges.or.jp/public/2006gl/

Action Plan for 2030, which include 80,000ha of grassland on drained organic soil being subject to reduced management intensity and 65,900ha of peatland restoration.

To reduce greenhouse gas emissions in the land use sector Ireland should look to simultaneously achieve both ambitious rewetting targets and peatland restoration.

If Ireland is to avail of the flexibilities within the NRR to offset ambition on organic soils in agricultural use then the peatlands identified for restoration and rewetting should take into account ecological criteria and look to maximise synergies with Art 4 by providing benefits for relevant habitats and species, for example the restoration of public forests on deep peat to peatland in areas adjacent to Annex I peatlands.

The NRP should not use elevation criteria to exclude organic soils from the requirements of Art 11(4).

Ireland should not invoke the derogation under Article 11(4) to reduce the proportion of land to be rewetted below the levels specified in Article 11(4)(a), (b), and (c). As rewetting on private farmland is dependent on voluntary participation through agri-environmental schemes, and does not necessarily entail full rewetting of land, there is no reasonable basis to assert that it would result in adverse impacts on infrastructure or the wider public interest.

Peatlands, when fully rewetted, deliver enhanced Biodiversity and Ecosystem Services to society, supporting biodiversity and providing improved water quality, flood mitigation, and carbon sequestration. Moreover, a more extensive restoration effort could unlock opportunities in green sectors, such as eco-tourism and sustainable land management practices. By ensuring rewetting across a greater area of peatlands and farmed organic soils Ireland can ensure a prudent investment, minimizing emissions and maximizing ecological function, setting a benchmark for environmental stewardship, driving down greenhouse gas emissions, and securing long-term environmental and economic resilience.

However while the ecosystem services provided will accrue to society, private land owners will likely only participate in significant numbers if the appropriate, voluntary long-term schemes are put in place to incentivise their participation. Moving forward it is clear that greater effort must be invested in explaining the realities of water table management, its implications and opportunities for land managers.

It is essential that farmers and rural communities are central in shaping and driving all of the measures related to the sustainable management of organic soils. Communities and landowners must be involved in decision making through early and sustained engagement. Wherever possible management interventions should look to deliver multiple environmental and social benefits and reward practitioners for the ecosystem services provided.

In order to counter the negative perceptions around rewetting the government should support awareness campaigns that demonstrate what water table management means for landowners and communities and highlight best practice examples. This could include information campaigns focused on LIFE demonstration sites, BnM raised bog restoration project (pre PCAS), PCAS, Living Lab Lighthouses under the EU Horizon, A Soil Deal for Europe, and past and ongoing EIPs such as FarmPEAT and Farm Carbon Transitions, respectively.

Building on the success of projects like Farm Carbon and Farm PEAT European Innovation Partnership Schemes, new long-term agri-environmental schemes should be put in place which will provide farmers with results based schemes that incentivise sustainable management of organic soils and peatland restoration.

Funding should be put in place to support communities, NGOs and private landowners to become the custodians of their local peatlands and wetlands, building on best practice examples such as Abbeyleix Bog Project, Carrownaggapul LIFE, Scohaboy Bog, Ballydangan Bog and the Community Wetlands Forum.

The State must lead from the front on peatland restoration by delivering ambitious nature restoration projects on publicly owned peatlands including the restoration and rehabilitation of peatlands and cutover bogs owned by Bord Na Móna and the restoration of legacy forestry on deep peat owned by Coillte.

9.2 Burning of Land

Burning on peat soils releases carbon, damages peatland habitats, and can worsen river ecology, while wildfires also destroy nests and other wildlife. While illegal burning is subject to monitoring and enforcement in Ireland, concerns remain about the consistency and effectiveness of enforcement, including the extent of staffing and the frequency of prosecutions. There is a strong case, as supported by Teagasc, for no burning on active or degraded blanket bog, raised bog, wet heath, and grassland. If burning is considered at all on dry heath, it should only be used as a last resort, subject to licensing, prior approval, and strict spatial and seasonal controls. Mechanical heather cutting or other non-burning methods should be encouraged as safer alternatives where management is needed.

Based on the available evidence there is an overwhelming case that no burning should take place on both active and degraded Blanket bog, Raised bog, Wet heath and on grasslands. There should also be a requirement for no burning to be allowed on grazed Blanket Bog and Wet Heath. If burning is allowed on Dry Heath it should only be undertaken if it is subject to licensing. In some contexts natural succession and ultimately native woodland re-establishment are the most ecologically appropriate land use and should be supported. The use of firebreaks may assist succession where regular gorse fires are an issue.

A new licensing system should require that any burns are in line with best practice and are subject to prior approval by the relevant authorities and have spatial and temporal controls to ensure that deep burns do not cause damage to the soil. The recent example of the extensive and highly damaging wildfires in the Mourne Mountains demonstrate the dangers of unregulated burning of land, which could lead to a regression in nature restoration efforts. At the same time, re-establishing healthy ecosystems via the NRR can act as a buffer to such events, likely to be exacerbated by extreme weather events brought about by climate change.

9.3 Sustainable Grazing

Grazing pressure should be kept at sustainable levels to prevent erosion, peat loss, and biodiversity decline and should be a core focus within the NRP given the huge grazing pressures evident across Irish landscapes. Grazing should be seasonal and carefully managed, with winter grazing on blanket bog avoided where possible. In severely degraded areas, complete destocking should be considered if habitats do not improve under management.

The density of livestock and deer on blanket bog should be maintained at sustainable levels, and blanket bog should not be grazed between the start of November and the end of February. Consideration should be given to supporting the use of precision livestock management such as virtual fencing and a return to more mixed summer grazing in the uplands with suitable breeds of cattle and horses.

10. Forest Ecosystems

Article 12 of the Nature Restoration Regulation requires Member States to enhance the biodiversity of forest ecosystems, and achieve increasing trends at national level in the common forest bird index, and in at least 6 of 7 key indicators by 2030 and every 6 years thereafter until satisfactory levels are reached.

The right tree, in the right place, under the right management can benefit climate, biodiversity and water quality while also generating space for recreation and reflection and supporting sustainable employment. However, the opposite also holds true, with poorly planned afforestation resulting in greenhouse gas emissions, biodiversity loss, pollution and negative socio-economic impacts on affected communities. Commercial forestry in Ireland is a significant threat and pressure on protected habitats and species given the intensive management practices involved, such as drainage and clearfelling. It is critically important that future afforestation is compatible with the obligations and the spirit of the NRR.

Focus should be on sustainable afforestation (Close to Nature Silviculture, CCF, Agroforestry), reforestation, tree planting, and urban greening to support restoration targets under Article 12 (forests). Article 13 of the Nature Restoration Regulation sets an EU-wide commitment for Member States to collectively plant at least 3 billion additional trees by 2030. When contributing to the commitment of planting at least three billion additional trees by 2030 at Union level, Ireland should only report those native tree species which were planted since the NRR came into effect. Planting must follow ecological principles: prioritise native species, ensure diversity in species and age structure, and enhance ecological connectivity. We need to plant for connectivity and not just the ad hoc afforestation of blocks of trees.

The current Forestry Programme predates the NRR, and therefore there is misalignment with the obligations for native woodland restoration and re-establishment under Article 4 and the restoration of forest ecosystems under Article 12. The relevant authorities must ensure these issues are addressed urgently as well as ensuring that future Forestry programmes are fully aligned with the NRP. This presents a window of opportunity when formulating the next iteration of the Forestry Programme 2028-2032. We would have concerns regarding the following framing in the current NRP template which states that *"no guarantee can be provided in relation to the composition of future Forestry Programmes"* (p. 28). This suggests a lack of political ambition to ensure that future Forestry Programmes are in full alignment with NRR obligations. Investing in improving the conservation status of native woodland and expanding and connecting the most important habitat fragments in tandem with a transition towards more sustainable forest management and Close to Nature Silviculture will help to deliver on the obligations of the NRR.

Where possible the mid-term review of the Forestry Programme should integrate the requirements of the NRP, with quantified targets cross-referenced to NRR. Enabling actions would include the removal of certain criteria for eligibility for the Native Woodland Scheme, including elevation and productivity criteria.

Key features in the design of future Forestry Programmes should include the following:

i. Prioritisation of native woodland expansion, restoration, re-establishment and enhanced connectivity.

ii. Native woodland schemes which pay private landowners attractive premiums for afforestation and woodland management, including the expansion of the FT5 – Emergent Forest scheme with increased payments and targeted landscape actions.
iii. Update procedures to allow for easier conversion old forestry plantations into native woodland, allowing for natural regeneration. Deprioritisation of the stem/ha count in native woodland creation should also be advanced.
iv. Accelerate the transition to sustainable forest management by setting ambitious targets for native broadleaves, Continuous Cover Forestry (CCF) and Close-to-Nature Silvilculture.
v. Increase payments for agroforestry around woodland areas to increase ecosystem function, reduce edge effect and enhance connectivity.
vi. Phase out clear-felling practices and dependency on insecticides such as acetamiprid, prioritising natural regeneration, CCF and establishment of landscape scale ecological corridors on public lands such as in the Coillte estate.
vii. Prioritise the restoration of afforested peatlands to tackle the persistent legacy forest issue on ecologically inappropriate sites such as deep peatlands. Sites within public ownership (i.e. Coillte) are low hanging fruit for the purposes of nature restoration and would reinstil public confidence in the agency.
viii. The State should be proactive in identifying sites where native woodlands can be expanded or re-established to deliver nature-based solutions for flood risk management and reduction of landslide risk. Protective buffer effects of woodland creation should be acknowledged and subject to strategic mapping and siting.
ix. Rewilding should be adopted as a practical, landscape-scale approach to facilitating the natural regeneration of native woodlands via over-grazing exclusion and supplementary planting utilising native stock of Irish provenance sources from local tree nurseries which have foraged from Ancient and Long-Established Woodland (ALEW) sites. Addressing key constraints on regeneration, especially grazing and burning, is the most cost-effective way to ensure the ongoing improvement and non-deterioration of sites subject to native woodland restoration.

NRP formulation should be fully aligned with a national survey effort to spatially identify the full suite of Ancient and Long-Established Woodlands (ALEWs) and Native Woodlands throughout the country. Research conducted by Devaney *et al* (2024)[9] highlighted the following which is of relevance for nature restoration and formulation of the NRP:

- The ALEWs identified in the 2010 national survey (the last dedicated survey effort) have no statutory conservation designation and require expansion of current protected areas to encompass and connect ALEWs, including expansion and greater protection of pNHA and NHA areas.
- A sizeable proportion of ALEWs are dominated by conifer plantations who require targeted restoration intervention and prioritisation.
- A full national inventory of ALEWs is urgently required given that the 2010 inventory applied a threshold of 5ha or greater, ensuring that existing ALEW fragments below this threshold remain unidentified. These would be integral to achieving forest restoration obligations under Article 12 of the NRR.
- ALEWs of high conservation value should be prioritised at the very least. While ALEWs corresponding with Annex I habitats under the Habitats Directive may have formal designation and protection, other ecologically important woodland types such as WN2 Oak-ash-hazel

[9] Devaney, J., Shaw, H., Leniston, T., Mitchell, F.J.G., Darcy, E. & Roche, J. (2024). Mapping, monitoring, and protecting ancient and long-established woodland in Ireland. Irish Wildlife Manuals, No. 153. National Parks and Wildlife Service, Department of Housing, Local Government and Heritage, Ireland. https://www.npws.ie/sites/default/files/publications/pdf/IWM153.pdf

woodland may lack protection under existing national legislation for which the NRR could offer greater benefit.
- Restoration of Annex I ALEW sites with unfavourable conservation status will require mapping and prioritised restoration effort under the NRR.

Collaboration is needed with the tree nursery sector to ensure that future demand for trees and shrubs under future Forestry and CAP programmes is supplied by Irish suppliers. Steps taken should include more accurate forecasting of demand for tree nurseries. Local nurseries providing local providence saplings for each ALEW would protect genetic diversity and boost local economies.

10.1 Forest Ecosystem Indicators

Under Article 12(3) an increasing trend must be achieved in at least six out of seven indicators for forest ecosystems, chosen on the basis of their ability to demonstrate the enhancement of biodiversity of forest ecosystems. As the stated intent is to enhance the biodiversity of forest ecosystems the NRP must ensure that the selection of indicators and the implementation of measures is consistent with the objective of enhancing biodiversity.

We support the DAFM proposal to select the following six indicators, excluding (e) stock of organic carbon. The six proposed indicators will be more effective at enhancing the biodiversity and ecological integrity of forest ecosystems:

1. Standing deadwood
2. Lying deadwood
3. Share of forests with uneven-aged structure
4. Forest connectivity
5. Share of forests dominated by native tree species
6. Tree species diversity

Additional spatial analysis is required in order to establish the forest connectivity indicator and track changes over time. The implementation of forest connectivity should prioritise enhancing native woodland connectivity where it will deliver connectivity between habitats falling under Art 4 (7) and Art 4(10). Priority should be given to enhancing the connectivity of most important native woodland habitat (Designated sites and ALEW) and the habitats of species which are particularly vulnerable to fragmentation such as Lesser horseshoe bat (*Rhinolophus hipposideros*), Pied flycatcher (*Ficedula hypoleuca*) and Purple Hairstreak (*Neozephyrus quercus*).

Enhancing the connectivity of Annex I native woodland should not be done in a way that would result in the loss and fragmentation of other important Annexed habitats or the habitats of species which fall under Art 4(7). An example would be the need to restore, re-establish and re-connect the habitat of open habitat specialists like Hen harrier (*Circus cyaneus*).

Use NFI protocols to track annual deadwood volume trends, ensuring at least six indicators (including deadwood, uneven structure, connectivity) show uplift by 2029 via remote sensing and plot surveys.

The ultimate goal of native woodland conservation and forest ecosystem restoration should be to create the Old-growth forests of the future. Old-growth forests are biodiversity hotspots due to their structural complexity, multi-layered canopies, deadwood, and diverse microhabitats that support rare, threatened species unable to thrive in younger forests. They host irreplaceable habitats for specialised species, while fostering high species diversity through stable, undisturbed conditions unmatched by managed plantations and young or disturbed woodlands. Creating old-growth forests typically requires 150-500 years or more without major disturbances like harvesting or fire. This long timeline

arises from gradually increased structural complexity, species diversification and the accumulation of veteran trees and deadwood. Old-growth woodlands will naturally ensure increasing trends in the six forest ecosystem indicators.

As highlighted in the NRR the EU Biodiversity Strategy for 2030 sets out a commitment to legally protect a minimum of 30 % of land and sea, of which at least one third should be under strict protection, including all remaining primary and old-growth forests.

The NRP should set out a strategy that will ensure that all Ancient or Long-established Woodland (ALEW) are strictly protected, prioritising designated woodlands for initial strict protection (Ancient Woodland (continuously wooded pre-1600 or 1660, per Down Survey) or Long-Established Woodland (wooded since 1830–1844 OS maps, no planting evidence) are provided with strict protection).

Strategic Expansion from High-Conservation Value Native Woodlands - Ireland's Nature Restoration Plan should prioritise identifying clusters of high conservation value native woodlands, using criteria like Annex I habitats, Ancient and Long-Established Woodland (ALEW), and proximity (≤500m), then expand restoration outward from these core areas. Target "low-hanging fruit" such as the native woodland already on public lands (Coillte, NPWS, Bord na Móna) plus those adjacent within 200m, and Coillte's Bioclass sites for biodiversity. This enables rapid, landscape-scale re-establishment of old sessile oak woods and alluvial forests without private land complexities.

Expansion from High-Conservation Value Native Woodlands could be achieved through natural regeneration, creating buffers around identified ALEW sites where no non-local provenance saplings are used or natural regeneration is implemented.

There should be no planting with a minimum 500m of an identified ALEW site. Ideally ALEW sites should have seed collected and grown in local nurseries and any expansion of these areas should use applied nucleation as the planting method which involves planting small patches of trees as focal areas for recovery which mimics natural succession.

10.2 Forest Birds

Measures must be put in place to achieve an increasing trend in the Forest Bird Index at national level until satisfactory levels are reached.

BirdWatch Ireland under a tender arrangement with NPWS collates data for Article 12 via I-WeBS (Irish Wetland Bird Survey) which is the national monitoring scheme for over 50 bird species and CBS (Countryside Bird Survey) which tracks the population trends of common and widespread breeding bird species. These surveys do not currently lead to the production of a common forest bird index. To create a bird index, species are selected and classified according to habitat types. For a Forest Bird Indicator, it is crucial to choose specialist and generalist species that are reflective of their habitat and serve as adequate bio-indicators. In this case the focus of interest is in species that are reflective of native forest conditions in Ireland.

Ireland has one of the poorest native woodland covers in Europe. Therefore, data provided solely by the Countryside Bird Survey (CBS) would primarily reflect generalist bird species and specialists in non-focal habitats. As a result, species in decline such as forest specialists will be masked by generalist species which are much more adaptable. The long-established CBS may be utilised to produce a forest bird index. However, the addition of periodic targeted forest bird surveys would strengthen the indicator as it would increase the representation of forest specialists in their focal habitat. This use of supplemental data has been applied in the UK's Forest Bird Indicator e.g. national capercaillie surveys and would ultimately provide a better indication of native forest condition in Ireland.

A Forest Bird Index should be introduced based on the feasibility study produced by BirdWatch Ireland in August 2025 with the addition of targeted forest surveys.

10.3 Native Woodlands and Upland Habitats

The Nature Restoration Regulation sets targets for the restoration and reestablishment of both natural habitats such as woodland, which are the natural climax ecological communities in much of Ireland, and semi-natural habitats which have been shaped by our ongoing relationship to the land over millennia. Both are an intrinsic part of our natural and cultural heritage and we must simultaneously meet our obligations to restore all habitats. The Nature Restoration Plan should for the first time create a high-level strategic approach to how we restore different habitats simultaneously at a national and landscape level. Authorities must ensure that the loss of a habitat in one area can be compensated in another in order to ensure that all habitats and species achieve their favourable conservation status.

In the case of native woodlands it is important that we recognise their historical distribution in our uplands. However, the ad hoc restoration of native woodlands risks driving further decline in semi-natural upland habitats such as grasslands, dry heath and wet heath. In addition, existing legal protection for these semi-natural habitats in tandem with outdated forestry productivity requirements, such as productivity and altitude restrictions, create a challenging environment for communities trying to restore native woodlands.

The Nature Restoration Plan should establish a high-level strategy for coordinated restoration at national and landscape scales. Authorities could explore no-net-loss within native woodland restoration projects, allowing compensation where losses occur in one area to ensure favourable conservation status for all habitats and species.

- Develop a collaborative strategy with experts, civil society, and farmers to resolve constraints on native woodland restoration while advancing semi-natural uplands and peatlands.
- Remove altitude and productivity restrictions from native woodland schemes.
- Proactively map upland areas suitable for woodlands without Annex I conflicts, such as non-designated areas and extensive bracken or gorse stands.
- Prioritise semi-natural habitat restoration in key areas like Hen Harrier SPAs to balance objectives.

10.4 Deadwood

Standing and lying deadwood are key stages in a trees lifecycle and are a cornerstone of forest biodiversity, hosting up to 30% of European forest species, especially saproxylic invertebrates, fungi, and cavity-nesters, that rely on its decay stages for food, shelter, and reproduction. This structural legacy creates microhabitats absent in living timber, driving nutrient cycling, soil enrichment, and carbon storage while stabilizing ecosystems against disturbances. It is critical that achieving increasing trends in standing deadwood and lying deadwood are done in a way that enhances the biodiversity and resilience of forest ecosystems, rather than locking in unsustainable exploitation.

Strict protection of ancient and long established woodlands (ALEW) should be prioritised, to accelerate deadwood trends while ensuring the relevant Article 12 indicators are delivered in a way that enhances biodiversity.

To achieve increasing trends in standing and lying deadwood, the NRP should prioritise setting mandatory targets in forest management plans, for example:

- Set targets for an increasing percentage of felled stems to be retained as lying and standing deadwood in both public and private forests.
- Set targets for the retention of veteran old trees, prioritising native species.
- Ensure that mature trees within biodiversity areas are not commercially exploited but allowed to go through their full life cycle.
- Promote native woodland conservation and Close to Nature Silviculture in public forests.

10.5 Deer Management

It is welcome to see the National Deer Management Strategy referenced as a complementary measure for supporting the attainment of NRR obligations, which needs to be resourced and actioned swiftly to reverse biodiversity decline. Deer management actions under the NRP also need to recognise the addition of the problematic Sika deer species *(Cervus nippon)* to the list of Invasive Alien Species of Union Concern under EU Regulation (No. 1143/2014), recognising its contribution to inhibiting the regeneration of native woodland and other habitats via trampling, browsing, fraying and bark stripping. Overgrazing by both native and invasive deer species is a key threat and pressure on a number of protected habitats and in particular native woodlands. Non-native invasive deer species should be prioritised for control ahead of native species such as Red Deer (*Cervus elaphus*) in National Parks while acknowledging the need to maintain the population of even native and naturalised herbivores.

Deer management must be underpinned by clear targets and data on the density per km2 (less than 1/2 per km2 for native broadleaf regeneration) and / or natural regeneration such as new stems per ha.

The NPWS and Coillte should produce deer management strategies for the public lands they manage and work with all relevant stakeholders and adjacent landowners to manage deer numbers.

The Forest Service should continue to improve efforts to make deer fencing more affordable for private landowners under the forest strategy and money should be prioritised to long term management. Funding should be made available for full time, effective and humane deer stalking measures and necessary research.

10.6 Invasive Plant Species

Non-native invasive plant species are a key threat and pressure on native woodlands in Ireland. Invasive species control should be prioritised as a core restoration action, integrating with existing frameworks like the 4th National Biodiversity Action Plan and to complement the work of the recently established Invasive Species Bureau.

High-priority non-native plants (e.g., Rhododendron ponticum, Cherry Laurel, Japanese Knotweed) should be targeted for systematic removal in native woodland SACs and pNHAs by 2030, using mechanical, chemical, and biological methods where feasible. Pre- and post-intervention monitoring should be mandated, with baseline surveys completed by end-2026, focusing on woodland hotspots such as woodland recorded under Art 17, ALEW and Native Woodland surveys. Volunteers on the ground can sometimes do the heavy lifting when it comes to floral invasive species management, which could be bolstered by support from the State. In this regard, it is welcome to see the recent establishment of the Invasive Species Bureau which should play a key part in NRP formulation.

Biosecurity measures should be strengthened, prohibiting untreated habitat material movement near woodlands and requiring Check-Clean-Dry protocols for forestry and landscaping activities

Planning guidelines (and others) should be updated to ban non-native plant sales/planting and enforce IAS risk assessments for afforestation permits. We note that the European Communities (Birds and Natural Habitats) Regulations (S.I. 477/2011) (the "2011 Regulations") contain Regulations 49 and 50 which seek to implement Article 22(b) of the Habitats Directive to regulate the deliberate introduction of non-native, potentially invasive, species. Article 22(b) is articulated as follows: "*ensure that the deliberate introduction into the wild of any species which is not native to their territory is regulated so as not to prejudice natural habitats within their natural range or the wild native fauna and flora and, if they consider it necessary, prohibit such introduction.*"

We submit that the requirements of this Article will not be sufficiently satisfied until the continued sale of harmful floral non-native species is prohibited. These are sold, or are contained, in botanic gardens, arboreta, garden centres, private collections and plant nurseries where the disposal of unwanted plants, garden waste and soil are common ways in which invasive species can be spread inadvertently. The importation of Third Schedule prohibited flora and their subsequent sale in Ireland, appears to continue unabated despite regulations in existence designed to prevent this. For example, Regulation 56(d)(6)(a) (S.I No. 371 of 2001) states that:

> *"(6) (a) The Minister may, if considered necessary, by regulations prohibit the possession or introduction of any species of wild bird, wild animal or wild flora or any part, product or derivative of such wild bird, wild animal or wild flora which may be detrimental to native species.*
>
> *Where non-native species of wild bird, wild animal or wild flora or any part, product or derivative of such wild bird, wild animal or wild flora have been introduced, the Minister shall, to the extent that it is feasible and appropriate, take measures to ensure that such introductions do not pose a potential hazard to native stocks."*

The continued spread of Cherry Laurel, Rhododendron, Montbretia and Japanese Knotweed throughout the country demonstrates the severity of the invasive species issue, largely allowed to continue due to the sale of these species. We note that Regulation 50 on the 'Prohibition on dealing with and keeping certain species' has not been enacted which exacerbates this issue as it is supposed to prohibit: "*…for the purposes of breeding, reproduction or propagation, or offers or exposes for sale, transportation, distribution, introduction or release- an animal or plant listed in Part 1 or Part 2 of the Third Schedule,…*"

Currently, Rhododendron and Japanese Knotweed are listed in the Third Schedule. However, the ongoing lack of enactment of Regulation 50 allows these species to be sold, sowed in gardens and inadvertently released into the wild, with severe ecological repercussions due to their detrimental impact upon native biodiversity. Once established, these species spread quickly and become very difficult to manage. This trend has occurred all too frequently throughout Ireland, representing a costly biodiversity management issue, and will worsen if not dealt with urgently. Cherry Laurel and Winter Heliotrope also need to be placed on the Third Schedule to prevent their devastating impact upon Irish woodlands. The NRP represents an opportunity to turn the tide on invasive floral species proliferation across the country by seeking necessary regulatory change, involving the Invasive Species Bureau as a stakeholder and supporting management actions on the ground.

11. Marine

Article 5 is a central provision of the NRR, establishing binding targets and timelines for the restoration of marine ecosystems across EU waters. It requires Member States to implement measures to restore

degraded marine habitats, improve the condition of protected species' habitats, close knowledge gaps, while also embedding obligations on non-deterioration and the continuous improvement of ecosystem condition over time. Prioritising restoration within the jurisdiction of Ireland's territorial waters may accelerate implementation of restoration effort. The latest Article 17 report shows that most of Ireland's key marine habitats are in unfavourable or bad conservation condition. Designated sites in particular must be targeted for restoration with clearly defined conservation objectives and restoration plans, especially in relation to the Group 1-6 habitats under Annex II (i.e. Seagrass beds; Macroalgal forests; Shellfish beds; Maerl beds; Sponge, coral and coralligenous beds; Vents and seeps). With regard to critically endangered species dependent on the marine environment such as elasmobranchs and seabirds, targeted restoration effort and restrictions of damaging activities such as tangle nets require urgent implementation. Data on Important Shark and Ray Areas compiled by the IUCN[10] and Important Bird and Biodiversity Areas compiled by BirdLife International could be leveraged to inform restoration efforts.[11] The identification of important seabird foraging areas and routes, and their subsequent spatial mapping, will assist in identifying areas of overlap with Annex I marine habitats and sites being considered for offshore wind development.

Offshore fisheries activity under the EU Common Fisheries Policy should also be managed in such a way as to tackle damaging fisheries activities in areas selected for restoration under the NRR. The selection of marine restoration areas must occur in tandem with the management and expansion of marine Natura 2000 sites, and the designated of MPAs. The NRP should also take account of deep sea habitats, the continuation and enforcement bottom trawling bans and the passive restoration and strict protection of these habitats which must ensue given the sensitivity of these habitats to disturbance (e.g. cold water corals, sponge grounds and seamounts).

11.1 Urgent Implementation of Marine Protected Areas

There is an ongoing failure to provide for Marine Protected Areas (MPAs) as required by Article 13(4) of the Marine Strategy Framework Directive. Designating MPAs at the start of marine spatial planning processes is key to a truly ecosystems-based approach. Very regrettably, the long-awaited MPA legislation, in any form, still has not been published at the time of writing. Despite the target of 30% of the marine area to be protected by 2030, less than 10% our waters have been designated as protected areas while multiple offshore development proposals, and now a DMAP for offshore renewable energy, move forward and other ongoing impactful activities continue (such as industrial-scale fishing). The Government should prioritise the passing of legislation required to establish MPAs and establish these areas as a matter of urgency. These areas should overlap with the habitat types identified in the Nature Restoration Regulation, contribute to achievement of targets therein and complement the existing marine Natura 2000 sites. This must be bolstered by a clear and transparent governance framework with oversight of marine nature restoration design and implementation within existing protected areas and newly created ones under the Habitats and Birds Directives and the Nature Restoration Regulation.

Interdepartmental coordination is of paramount importance given that the Department of Agriculture, Food and the Marine has responsibility for fishing activity and the Department of Climate, Energy and the Environment has responsibility for implementation of the Marine Strategy Framework Directive, Maritime Planning and implementation of national MPAs.

Furthermore, collaboration with local stakeholders such as fishers in the development of the NRP is essential to enhance legitimacy and embed important local, contextualised practitioner knowledge.

[10] https://sharkrayareas.org/e-atlas/
[11] https://birdwatchireland.ie/our-work/important-bird-and-biodiversity-areas/

Fishers and coastal communities must be acknowledged as custodians of their marine environment and involved in restoration management.

In light of the foregoing context on marine restoration, the following recommendations are provided:

Recommendations:

- Clear mandates for the bodies responsible for managing marine Natura sites
- Protected sites should appear on nautical maps for fishing vessels
- Fishing licences should apply to a specific area, in order to monitor and manage activities inside protected areas and to avoid reversing restoration measures
- Reduced fishing effort through structured participation management for any fisheries that could have an impact on habitats and species
- The Department of Agriculture, Food and the Marine must increase the number of active Fisheries Natura Declarations (FNDs) in Ireland's current Natura 2000 to manage fishing activities.
- Enact ambitious national MPA legislation which includes a target for at least 30% MPA designation with at least 10% strict protection to be in place by 2030. Designations must be accompanied by site specific management plans.
- Restoration measures should be aligned with the objectives of the Birds and Habitats Directives, WFD, MSFD and CFP. Integrating restoration measures into workplans for the MSFD and WFD is essential.
- Member states are required to prioritise Natura 2000 sites up until 2030, however many key habitats occur outside these areas and should also be subject to restoration measures bearing in mind the longer term targets for 2040 & 2050. Restoring and protecting these habitats now is easier and more cost effective than re-establishing them later. This also aligns with protecting the habitats and food sources of species listed in the regulation
- Group 7 is subject to a lower restoration threshold. The % should be set at a high ambitious % as soft sediments in the wider marine space are intrinsically linked to coastal and transitional habitats (estuaries, salt marshes, mudflats in Article 4)
- An analysis of future impacts of industries should be conducted and results taken into account. ORE will be progressed over the next decade and the impact this has on the ecosystems and species should be accounted for and mitigated against in nature restoration plans. Displacement of fisheries also needs to be taken into account and appropriate compensation offered to avoid damage or increased fishing effort in other areas.
- Damaging activities such as bottom trawling must be restricted in order to restore marine ecosystems, following the example of Member States such as Sweden and Greece.
- Coordination across Government departments and bodies since agricultural runoff, sewage, untreated wastewater and other pressures impact the marine environment. A coordinated approach is essential for successful restoration.
- Ensure establishment of Favourable Reference Area in the marine environment which takes account of Commission guidance, the requirements of Article 14(2) and is underpinned by historic data, ecological needs, expert opinion, citizen science observations. Connectivity, fragmentation, species range and habitat requirements must be considered also. Finally, climate change projections and associated pressures on habitat must be incorporated to consider resilience.
- Identify the habitats used by the species included within the NRR, Habitats and Birds Directives and calculate the surface area so that an estimate of the area needed for restoration and reestablishment can be included in the draft plan.
- Ensure that any activities which could pose a threat to the species listed undergo appropriate AA's and a just transition to a less harmful activity is supported by Government, through

financial and resource supports. This includes damage to their habitat, food source or the species themselves.
- Habitat restoration for the species included in the law should take place in the areas where these species are known to occur and ensure ecologically connected habitat corridors for wide ranging species as called for in Article 5(8) of the law

11.2 Impact Analysis and Management of Marine Invasive Alien Species (IAS)

Globally, IAS are a top driver of biodiversity loss. In Ireland, IAS are estimated to collectively cost hundreds of millions of Euros annually, and they are one of the most significant and poorly understood threats to successful nature restoration. In the marine environment, shellfish, ballast water, and hull fouling are well-known established transport vectors for IAS. While new pathways, such as glass eel transport[12], renewable energy infrastructure, and sushi-related invasions[13], are emerging in recent years.

For effective restoration in the marine environment, the NRP must support stringent measures and management plans for IAS, as is outlined in the European Union (Invasive Alien Species) Regulations 2024 (S.I. No. 374 of 2024) and under the Wildlife Act 1976 and 2000, the European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011), and the Marine Strategy Framework Directive[14]. The development of Marine IAS Management Plans must look to international examples of successful and unsuccessful Marine IAS strategies, including horizon scanning for future threats.

To successfully implement Marine IAS Management Plans, a wide range of stakeholders must be engaged, educated, and upskilled. Example stakeholders include:

- Government Agencies, including the National Parks and Wildlife Service (NPWS)
- Local Authorities
- Managers of ports, harbors, and marinas
- Recreational users, i.e. boat owners and watersport clubs
- Shipping
- Naval activity
- Renewable sector
- Aquaculture and fisheries
- Nature restoration projects
- Environmental education NGOs
- Community organisations

A lack of understanding of Marine IAS at the highest level in Ireland is highlighted in the First Schedule list of Invasive Alien Species of National Concern (2024). In this list, several species have been incorrectly assigned or misspelt.

Example errors in the First Schedule list of Invasive Alien Species of National Concern:

- *Balanus improvises* does not exist. The spelling is incorrect. *Balanus improvisus* does exist, but it was reassigned as *Amphibalanus improvisus* in the early 2000s.
- *Didemnum spp.* includes several non-designated species in Ireland. *Didemnum vexillum* is a designated IAS.

[12] https://www.fisheriesireland.ie/sites/default/files/2023-11/tege_annual_report_2021.pdf
[13] https://cbma.uminho.pt/sushi-seaweed-threatens-biodiversity-in-northern-portugal/
[14] https://environment.ec.europa.eu/topics/marine-environment/descriptors-under-marine-strategy-framework-directive_en

- *Grateloupia turuturu* was misidentified as *Grateloupia doyphora* in England in 1969. Gavio and Fredericq (2002)[15] used genetic techniques to demonstrate that this alga was, in fact, *G.* turuturu.

To better support Marine IAS management in Ireland, greater funding must be made available to site managers, i.e. NPWS, LA, and OPW. This funding would allow for new dedicated Marine IAS staff, upskilling of current staff, and development of management actions. It is also essential that we look to other countries for examples of successes and failures, e.g. A Century of Chinese Mitten Crab Invasion: Lessons Learnt on the Ecology and Behaviour of Species in Belgium[16].

Citizen Science will also be a key factor in early detection of IAS. The Invasive Team of the National Biodiversity Data Centre will play a vital role in education on identification skills, mapping the spread of IAS and collaborating on eradication efforts, e.g. the Asian Hornet early detection through citizen science in 2026[17].

Recommendations:

- Ireland's restoration plans must include Marine IAS Management Plans in line with national and international regulation
- We must look to other European countries for examples of successful and unsuccessful management strategies and scope out future threats
- Government Agencies and all relevant stakeholders must be educated and upskilled to implement Marine IAS Management Plans
- The responsible authorities, i.e. NPWS and BIM, must receive funding to adequately support Marine IAS Management Plans
- Citizen Science can play a key role in early Marine IAS detection and, as such, the Invasive Species Team at the National Biodiversity Data Centre must be further funded to support for Marine IAS education and data collection purposes

11.3 Elasmobranchs

In 2025, the IUCN Species Survival Commission's Shark Specialist Group' Important Shark and Ray Areas (ISRA) team worked with regional experts to map ISRAs in European waters. ISRAs are defined as "discrete, three-dimensional portions of habitat, important for one or more shark species, that are delineated and have the potential to be managed for conservation". Twelve full ISRAs and 4 Areas of Interest (AOIs) were mapped in or overlapping with Irish waters for a total of 21 qualifying species and 38 supporting species (see https://sharkrayareas.org/isra/selection-criteria/). Among these species, four are included in the NRL's Annex III for Restoration of marine ecosystems, three of which are threatened with extinction in Ireland and globally. Each of these areas are defined by the physical, biochemical and biological characteristics of their ecosystems, including habitats present, which contributes towards the regular and predictable presence of the qualifying and supporting species and have the potential to be managed for conservation. AOIs may have irregular sightings, historical records or a lack of information on the behaviours of the species in the areas and should

[15] Gavio, Brigitte; Fredericq, Suzanne (2002) *Grateloupia turuturu* (*Halymeniaceae, Rhodophyta*) is the correct name of the non-native species in the Atlantic known as *Grateloupia doryphora.* European Journal of Phycology 37(3): 349-359

[16] https://www.interregnorthsea.eu/clancy/news/a-century-of-chinese-mitten-crab-invasion-lessons-learnt-on-the-ecology-and-behaviour

[17]Article https://www.gov.ie/en/department-of-housing-local-government-and-heritage/press-releases/first-asian-hornet-nest-in-ireland-safely-removed-by-npws/)

be included in the consideration of measures as action taken could contribute towards restoring populations in key areas to species' life-histories.

Given the perilous conservation status of these species it is critical that Ireland takes urgent action, prioritising habitats within the ISRA's for restoration by 2030. Given that many of these species are data deficient the ISRAs should be recognised as representing the best available scientific advice.

Ten of the Twelve ISRAs and one of the AOIs have confirmed records of at least one of the Annex III species. Restoration of habitats in these areas would benefit these species, particularly in the case of bottom-dwelling species (e.g. Angelsharks) that forage on fish and invertebrates.

Given the overlap between the ISRAs of relevant Annex III elasmobranch and Annex II habitats (Table 2) prioritising these areas for restoration would help to deliver on key legal obligations of Art 5 in an efficient and ecologically coherent way.
Of the restoration measures found in Annex VII, (22) (25) (26) and (30) are of particular direct importance for the species and locations discussed here. Though all measures, if implemented, will have a positive impact on the species.

11.4 Marine Citizen Science

The NRP outlines Citizen Science as a tool for assessing the effectiveness of the restoration measures (Section 10.1.3.1) and for fish species monitoring (Section 14.3.1). It is our belief, however, that Citizen Science plays a greater role in the development and successful implementation of NRP.

The flora and fauna of the marine environment are extremely vulnerable to changes in their habitats. Increased levels of carbon dioxide and warming temperatures due to anthropogenically driven climate change are creating a 'deadly trio' for marine species: ocean acidification, sea warming and deoxygenation[18]. The impact of climate change on our marine environment is compounded by other activities such as overfishing, coastal and marine infrastructure, IAS, pollution, and acoustic pollution from commercial shipping, seismic exploration, pile driving, and naval sonar. Excessive nutrient and the consequent eutrophication effect, from land run-off are also putting pressure on our coastal waters, with the EPA referring to 'alarming declines' in our estuaries due to nutrient pollution. Economically speaking, models indicate that the climate change 'deadly trio' will also affect fisheries and aquaculture management, as global marine production is predicted to decline[19].

Citizen Science is vital to real-time tracking of the impact of climate change and other anthropogenic activities in our marine environment. Historical citizen science data, from organisations such as Coastwatch (i.e. mapping of seagrass sites), the National Biodiversity Data Centre's Explore Your Shore Programme, and Seasearch, can be used to address knowledge gaps.

Outlining the requirement for long-term funding and resources for Marine Citizen Science programmes in the NRP grants the responsible agency the potential to collect large-scale datasets and plan accordingly for future environmental changes. In addition to vital ecological monitoring, Marine Citizen Science, and the training, mentoring, and upskilling required for effective delivery, fosters ocean literacy and awareness throughout society and across all sectors.

Recommendations:

[18] https://www.eea.europa.eu/en/analysis/publications/how-climate-change-impacts-marine-life
[19] Nolan, G., Cusack, C., Fitzhenry, D. (Eds.) (2023). Irish Ocean Climate & Ecosystem Summary for Policymakers. Marine Institute, Galway, Ireland, pp 20.

- Employ historical Marine Citizen Science data in the development and implementation of the NRP
- Recognise Citizen Science as a core component of successful restoration delivery in the marine environment
- Investment is required to support Citizen Science delivery, training, and upskilling across society and all sectors

11.5 Coastal Restoration

Our coastal ecosystems are vital biodiversity hotspots, supporting a diverse range of flora and fauna, as well as playing an important role in climate resilience through carbon sequestration and storm protection.

Recognise the Dynamics: Coastal ecosystems, such as dunes, seagrass beds, and saltmarshes, are also some of the most dynamic ecosystems. As such, the NRP must recognise the dynamic nature of these systems and outline that any restoration measures must be developed on a case-by-case basis. It is also advised that the NRP recognises the requirement to look to other European countries for examples of successful restoration projects, such as the Dynamic Dunescapes project (England and Wales), see https://dynamicdunescapes.co.uk/, and Amsterdam Dunes, see https://www.pwn.nl/amsterdam-dunes.

Case-by-case approach: It is essential that the NRP and the responsible agency acknowldege that, due to the dynamic nature of our coastal habitats, the restoration approach must be site-specific For example, under the current draft NRP, Section 4.2.4, dune stabilisation is listed as a consideration measure for the restoration of dune habitats. This may not be an appropriate restoration measure for all sites. Historically, dune stabilisation projects have led to the introduction of the invasive species *Hippophae rhamnoides*, while dune overstabilisation can be a factor in poor ecological habitat status. Over-stabilisation can lead to changes in sediment, flora and fauna composition, potentially leading to the loss of specialised dune species[20].

Funding Research, Education and Engagement: To adequately restore coastal sites, it is essential to engage all relevant stakeholders and ensure that the measures are appropriate to the site and acknowledge the system dynamics. This means training and upskilling site managers to understand the dynamic nature of our coastal systems, exploring success and failures from other European States, ensuring adequate resources for monitoring and horizon scanning, employing both historical and contemporary Citizen Science, such as CoastSnap, and engaging local communities to assit in long-term site guardianship.

Recommendations:

- Recognise the dynamic nature of our coastal habitats, including terrestrial, marine and transitional waters
- Restoration actions must be undertaken using a case-by-case approach
- Investment is required to support research, training, and upskilling for site managers and education across society and all sectors for long-term restoration success

11.6 Fisheries

[20] Rhind, Peter & Jones, Rod & Jones, Laurence. (2013). The Impact of Dune Stabilization on the Conservation Status of Sand Dune Systems in Wales. 10.1007/978-3-642-33445-0_8.

Increased funding and resources are needed for relevant bodies responsible for managing and monitoring activities around Natura 2000 sites.

All fisheries should undergo appropriate assessments or rigorous risk assessments in order to ensure they will not impact on the conservation objectives of a site or the restoration measures that will be put in place

Ongoing adaptive management of marine activities must be undertaken. This process should be open, transparent and include effective stakeholder engagement.

Clarity must be given to the public on these processes as currently it is difficult to find out information on how activities are monitored.

Section 19 (a)(4) of the Fisheries Act provides a loophole whereby aquaculture licence operators who have lapsed licences, but who have applied to renew that licence, can continue operating, pending a licencing decision. This has resulted in multiple aquaculture farms operating for well over a decade in many cases with no licence, and no environmental assessment of their operations, including things like salmon farms. This very much flies in the face of the Birds and Habitats Directive and the Water Fraemwork Directive, and it is critical that this loophole be removed to bring this licencing process into line with EU law.

Habitat types do not exist in isolation and there must be coordination between Article 4 and Article 5 habitats and a systems orientated approach must be undertaken. For example, agricultural and sewage runoff cause extreme deterioration to all habitats in Article 4 and 5. Cross departmental work on these issues must be made a priority.

12. Pollinators

Article 10 of the NRR sets binding targets for Member States to improve pollinator diversity and restore pollinator populations, with progress to be monitored and reported using a unified science based methodology.

In Ireland pollinators are in need of urgent conservation interventions. The IUCN Red List assessment suggests that 43% of bees and 34% of butterflies are at threatened or near threatened status in Ireland.[21] Furthermore, a 2006 assessment revealed that across the island, 30 of our 99 bee species are at risk of extinction, with 6% critically endangered, and 10% endangered.[22] As demonstrated by the European Grassland Butterfly Indicator, 3 out of 6 of our grassland butterfly species and 1 out of 3 grassland specialist species are in decline.[23] These alarming trends, mirrored across Europe, highlight the urgency of reversing pollinator decline and the importance of full implementation of Article 10 of the NRR.

One of the primary pressures on pollinator populations comes from agricultural intensification via increased mechanisation, fertilisers, pesticides, insecticides, re-seeding to encourage transition from semi-natural grasslands to single species improved grasslands, and the transition to silage. This has resulted in loss of floral diversity with adverse implications for pollinator sustenance and habitat.

[21] Ireland: 6th National Report to the Convention on Biological Diversity. 2019. Department of Culture, Heritage and the Gaeltacht. https://www.cbd.int/doc/nr/nr-06/ie-nr-06-en.pdf
[22] Fitzpatrick, Ú *et al.* 2006. Regional red list of Irish bees. National Parks and Wildlife Service, Department of Environment, Heritage and Local Government.
[23] https://biodiversityireland.ie/european-grassland-butterfly-indicator/

Land-use conversion to facilitate afforestation, urban development and extractive industries also contributes substantial pressures upon pollinators. In addition, land abandonment and scrub succession creates unsuitable habitat for these sensitive species. The NRP requires a suite of measures to tackle the advance of these pressures and reinstate suitable habitat for the species via pollinator-friendly development design and modification of intensive agricultural practices.

The All-Ireland Pollinator Plan (AIPP) has been successful in mobilising cross-sectoral action across the island of Ireland and in embedding pollinator conservation within communities, as reflected in the growing prevalence of pollinator-friendly green spaces and seasonal no-mow areas. This momentum positions the AIPP 2026–2030 to play a valuable role in supporting the delivery of Article 10 of the Nature Restoration Regulation.

However, while the AIPP is an effective engagement and coordination framework, it is not designed to deliver the scale of change required to halt and reverse pollinator declines at a national level. The majority of the actions referenced under the AIPP in the draft NRP rely on encouraging improved practices among key stakeholders, including local authorities, public bodies, transport authorities, and utilities. This reliance on voluntary uptake is insufficient. The State should take a leadership role by mandating and resourcing coordinated action across all levels of government.

Given its voluntary nature, the AIPP cannot credibly serve as the primary delivery mechanism for Article 10. Reliance on it as such also places an undue burden on the National Biodiversity Data Centre and other participants to compensate for the absence of binding state-led measures. Notwithstanding this, the NRP should integrate the AIPP 2026-2030 as a key tool for delivery of Article 10 while introducing complementary binding, state-led measures.

Research has identified that different pollinators need varying amounts of suitable habitat within agricultural landscapes in order to maintain a stable population.[24] Hoverflies, solitary bees and bumble bees need 6, 16 and 18% semi-natural habitat cover respectively, while butterflies require suitable semi-natural habitat across 37% of agricultural landscapes.

Under the EU Common Agricultural Policy (CAP) 2023-2027, Ireland's Strategic Plan requires farmers to maintain at least 4% 'Space for Nature' (non-productive features like hedges, walls, scrub, and watercourses) on their land to comply with GAEC 8 conditionality. This commitment is reiterated in the National Biodiversity Action Plan 2023-2030. Participation in the voluntary Space For Nature eco-scheme rewards higher levels, with 7% qualifying for one measure, while 10% counts as two measures. The Space for Nature Ecoscheme is the most popular measure with farmers with over 100,000 farmers opting into the scheme in 2023 and 2024. UCD research estimates on average 12-14% of Irish farmland already qualifies as Space for Nature, Teagasc found that intensive beef, dairy, and tillage farms average 5-7%.

These figures show that while the vast majority of farms support important space for nature, the average amount of habitat on farms is well below the thresholds needed by solitary bees, bumble bees and butterflies. The commitment within the National Biodiversity Action Plan[25] that by 2030, at least 4% of agricultural land has biodiversity rich landscape features, is also well below the EU

[24] Bishop *et al.* 2025. Critical habitat thresholds for effective pollinator conservation in agricultural landscapes. Science. Vol 389, Issue 6767. https://www.science.org/doi/10.1126/science.adr2146

[25] Department of Housing, Local Government and Heritage. (2023). Ireland's 4th National Biodiversity Action Plan 2023–2030. Government of Ireland. Available at: https://www.gov.ie/en/publication/9e86e-irelands-4th-national-biodiversity-action-plan-2023-2030/

Biodiversity Strategy for 2030[26] goal of 10% high-diversity landscape features in agricultural areas. The Kunming-Montreal Global Biodiversity Framework (GBF), Target 10 references a 10% threshold of semi-natural/natural habitat per km² as a minimum to sustain ecosystem functions like pollination and pest control within production systems. Research indicates that below this habitat level in agricultural landscapes, nature's contributions to people, such as pollination collapse, seriously risk food security.[27]

The NRP needs to acknowledge and produce SMART measures requiring greater space for nature on farms beyond what is supported via the CAP eco-schemes. Within the existing CAP mechanism, the retention of conditionality linked to retention of pollinator-supporting habitat on farms must be pursued and strengthened further within subsequent CAP Strategic Plans and other relevant policies. The commitment to at least 4% of agricultural land being retained for biodiversity rich landscape features within the National Biodiversity Action Plan needs to be increased for greater pollinator health outcomes. Agri-environmental schemes could assist pollinator outcomes by strengthened incentives for higher average Space for Nature across Irish agricultural land. Farmer training courses on enhanced habitat management for pollinators are also an essential prerequisite for successful nature-friendly land stewardship. Finally, a review of CAP interventions should be undertaken in the post-2027 CAP Strategic Plan to ensure that Article 10 pollinator restoration and Article 11 agricultural ecosystem restoration obligations are achieved.

More specific recommendations for promotion of pollinator-friendly habitat on farmland include incentivising management of farmland field margins, hare's corners and fallow areas for pollinator foraging; promoting land cover crops like mustard, clover or vetch in tillage production systems to provide in-crop flowers while improving soil health; maintaining flowering hedgerows with native species of Irish provenance, cutting hedges in a three-year rotation (no more than one-third annually) and trimming in the period between November-February after fruiting; allowing wildflowers in non-cropped zones like laneways, drains or riparian setbacks.

Rare plants and habitats play a crucial role in supporting specialist pollinators, particularly Ireland's red-listed species, many of which depend on rare semi-natural and Annex I habitats like machair and species-rich grasslands. Species such as the Great Yellow Bumblebee (Bombus distinguendus) exhibit strong ties to specific habitats, requiring targeted restoration to halt declines driven by habitat loss and fragmentation. Other examples include the Cryptic Bumblebee (Bombus sylvarum) linked to coastal dunes and fens, and various solitary bees tied to Annex I habitats such as limestone pavements or raised bog.

Article 4's restoration (4.1), re-establishment (4.4), connectivity (4.10) targets, for Annex I habitats offer a prime opportunity to take into account the conservation needs of threatened pollinators when prioritising sites for restoration, maximizing co-benefits for pollinator recovery under Article 10.

13. Rivers and Floodplains

The Regulation also requires Member States to contribute to the EU target of restoring at least 25,000 km of free-flowing rivers by 2030, primarily through the removal of artificial barriers, the restoration

[26] European Commission. (2020). EU Biodiversity Strategy for 2030: Bringing nature back into our lives. Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. COM(2020) 380 final, 20 May 2020. Brussels. Available at: https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en

[27] Biodiscovery. 2022. Sustainable Agriculture: Science Brief for Target 10 of the Post-2020 Global Biodiversity Framework. https://biodiscovery.earth/wp-content/uploads/2022/09/T10_brief.pdf

of river connectivity, and the restoration and maintenance of the natural functions of associated floodplains. In the Irish context, this should be understood not only as a biodiversity obligation, but also as a key opportunity to deliver water quality, climate adaptation and flood-risk benefits through integrated catchment restoration.

Article 9 of the Nature Restoration Regulation provides a significant opportunity for Ireland to move beyond a narrow focus on barrier mitigation to provide both lateral and longitudinal connectivty in order to facilitate fish passage and towards an ambitious programme to restore free-flowing rivers, riparian habitats and floodplains.

Ireland already has an important foundation in the form of the National Barrier Mitigation Programme (NBMP), led by Inland Fisheries Ireland, which is building the evidence base for barrier identification, assessment and prioritisation. The programme's work on surveying potential barriers, developing a geolocated database, and assessing sites provides a valuable starting point for Article 9 implementation. However, there is a clear gap between the current scope of the NBMP and the full legal and ecological ambition of Article 9. The NBMP is primarily framed around mitigating barriers to fish movement (longitudinal connectivity), whereas Article 9 requires a broader approach that explicitly includes the removal of artificial barriers, the restoration of river and floodplain connectivity (lateral connectivity), and the improvement of the natural functions of related floodplains.

It is clear from the draft NRP that insufficient work has been done to date on lateral connectivity and that assessment of related floodplains will only commence in 2026 with a high-level desktop study on the extent of floodplain disconnection on a national scale.

The NRP should broaden and strengthen the NBMP so that it becomes a core delivery mechanism for Article 9 rather than a parallel or partial response. Resourcing should be increased for Inland Fisheries Ireland's barrier teams with ringfenced funding to meet Article 9 objectives. Also, the delivery of the EPA's national *ecological floodplain map* should be accelerated to the end of 2026 to support the identification of restoration potential. This would additionally assist with achieving the obligations of the Water Framework Directive. Hydromorphology is the second greatest pressure on Irish waterbodies, and a return to more naturally functioning waterbodies would reduce that pressure considerably.

The future selection of sites under the NBMP should take into account the need to address both longitudinal and lateral connectivity and the need to improve the natural functions of related floodplains.

Artificial light at night (ALAN) should also be recognised as a barrier to fish migration. It should be minimised and, where possible, avoided along waterways, as it can act as a barrier to movement and disrupt ecological connectivity for many species.

The Article 9 obligations originate in the EU Biodiversity Strategy for 2030, which requires greater efforts to be made to restore freshwater ecosystems and the natural functions of rivers. This includes efforts to restore the natural connectivity of rivers via riparian areas and floodplains, including through the removal of artificial barriers, in order to support the reaching of favourable conservation status for rivers, lakes and alluvial habitats and species protected under the Habitats and Birds Directives.

Therefore, a central priority should be the development of a national inventory that goes beyond listing structures to identify where barrier removal and floodplain restoration will deliver the greatest ecological benefits. Priority should be given to rivers, riparian zones and floodplains associated with SACs, SPAs, and alluvial habitats, particularly where restoration would support the achievement of

favourable conservation status under the Habitats and Birds Directives. Likewise, restoration should be targeted to water bodies with high-status objectives under the Water Framework Directive, where removing barriers and reconnecting floodplains can help secure and sustain good ecological condition. This prioritisation is essential if Ireland is to meet Article 9 in a way that is strategic, measurable and ecologically credible.

A national Article 9 prioritisation framework inventory with the EU Biodiversity Strategy for 2030, the Habitats and Birds Directive and the Water Framework Directive should be developed. This should prioritise designated SACs, SPAs and the habitats of relevant Annexed species for restoration so that Article 9 can contribute to the achievement of favourable conservation status and the rehabilitation of High Status Water bodies.

By 2030 the plan should also take advantage of "low-hanging fruit", especially obsolete barriers that no longer serve a meaningful public purpose and may instead pose safety, maintenance or ecological risks. Such barriers are often the most straightforward candidates for removal, and removing them can rapidly improve longitudinal connectivity, habitat quality and river resilience. At the same time, priority should be given to sites where barrier removal can unlock wider catchment-scale restoration, including re-meandering, wetland rehabilitation, riparian planting and reconnection of floodplains. This would ensure that Article 9 is implemented as a landscape-scale restoration measure rather than a series of isolated engineering interventions.

Ireland should also explicitly embrace river and floodplain restoration as a nature-based solution to flooding. Natural water retention measures, river restoration and re-meandering can "slow the flow", reduce flood peaks downstream and store flood waters, while also delivering biodiversity and water quality co-benefits. This is especially important in the context of climate change, where more intense rainfall and more frequent flooding are increasing pressure on communities, farmland and infrastructure. Floodplain restoration should therefore be treated as part of flood-risk management, not as an optional add-on to conservation policy.

Catchment wide measures will inevitably be necessary under future climate scenarios, including allowing certain lands to flood (with attendant compensation for land-owners), as has been demonstrated to be effective in numerous other European countries, such as the Room for the River project in the Netherlands.[28] Implementing water retention areas requires space which could be found on agricultural landholdings. Importantly, these retention areas do not require permanent occupation of the land, as evidenced by the Dutch experience, with incidental use of these areas for particularly large water discharges being commonplace. Large flood reservoirs have proven effective in numerous locations, provided their capacity is large enough. We would reiterate that financial compensation for flooding of landholdings is an integral part of such approaches. Seasonal flooding of agricultural land and wetland/bog restoration should also be considered as a flood mitigation measure.

Riparian area soft engineering measures can also be balanced with ecosystem management. The protection and management of healthy riparian areas that border bodies of water is of paramount importance. Riparian areas may or may not require bank stabilization or erosion control measures due to their ecosystem, which acts as a transition area between water and land.[29]

The Water Action Plan 2024 also identifies indirect benefits of the following measures for flood mitigation: creation of buffer strips e.g. riparian zones, grass margins; planting hedges alongside watercourses & across slopes; agroforestry; interception ponds and constructed wetlands; rewetting

[28] https://www.stowa.nl/deltafacts/waterveiligheid/waterveiligheidsbeleid-en-regelgeving/room-river
[29] https://www.csagroup.org/wp-content/uploads/CSA-Group-Research-Nature-Based-Solutions-for-Coastal-and-Riverine-Flood-and-Erosion-Risk-Management.pdf

peatlands and direct benefits from planting with native woodlands. Such measures should be integrated into the NRP for the benefit of floodplain restoration and nature-based solutions in the context of climate breakdown and increased frequencies of flooding events.

River and floodplain restoration as nature-based solutions to flood risk management should be embraced by integrating them into national flood policy, delivering co-benefits for biodiversity, water quality and climate resilience.

The Arterial Drainage Act 1945 is legislation of a bygone era which has enabled decades of aggressive channelisation, embankment construction, and floodplain disconnection by the Office of Public Works (OPW), severely degrading river and floodplain ecology. These "hard engineering" interventions, straightening meanders, deepening channels, and removing riparian vegetation, have fragmented habitats, reduced ecological connectivity, trapped sediments and pollutants, diminished natural flood storage, and contributed to poor conservation status for many SAC rivers and alluvial habitats under the Habitats Directive. Straightened, over-widened channels increase flow velocity, erode beds, and prevent natural meandering essential for fish spawning, invertebrate diversity, and nutrient cycling, while disconnected floodplains lose wetland functions critical for water purification and biodiversity.

This legacy directly undermines Article 9 goals and WFD high-status objectives. The OPW's ongoing maintenance dredging and embankment reinforcement perpetuates this damage, often overriding environmental considerations despite statutory obligations under the EU Birds/Habitats Directives and now the Nature Restoration Regulation. The OPW's destruction of alluvial woodland and other Annexed habitat is also not coherent with obligations to restore and re-establish these habitats within the NRP.

The Arterial Drainage Act 1945 should be urgently reviewed and amended to:

- Explicitly prioritise nature restoration and resilient flood protection over drainage/agricultural interests.
- Reform the OPW's remit to prioritise nature-based solutions.
- Streamline enforcement powers across water agencies (OPW, IFI, EPA, NPWS) with mandatory environmental impact assessments, public accountability mechanisms, and coordinated catchment planning to halt ecological degradation and support Article 9 compliance.

Where floodplain restoration requires land which would historically have been grazed to be taken out of production or regularly inundated, fair compensation and appropriate support for affected farmers and landowners will be essential. In many cases, land managers are being asked to provide a public good by accommodating water storage and flood attenuation that protects homes, infrastructure and downstream farmland. Ireland should recognise this explicitly in the Nature Restoration Plan, drawing on international best practice, such as the Dutch 'Room for the River programme', and ensuring that restoration is equitable, durable and socially legitimate.

Fair compensation and support should be provided to farmers and landowners whose floodplain land is restored for floodwater storage, recognising their public good in protecting downstream communities.

Barrier removal, nature-based flood risk management, and broader nature restoration must form this unified strategy to tackle Ireland's interconnected river pressures, water pollution from agricultural and urban runoff, habitat fragmentation caused by barriers and channelisation, escalating flood risk from climate-driven extreme rainfall, and ongoing biodiversity loss. This approach ensures

coordinated action across scales, delivering Water Framework Directive compliance, resilient ecosystems, flood protection for communities, and sustainable benefits for water quality and wildlife.

We should adopt a holistic, catchment-based approach integrating barrier removal, nature-based flood management, and restoration to address water pollution, habitat fragmentation and flood risk, delivering WFD compliance and multiple ecosystem benefits.

14. Urban Ecosystems

14.1 No Net Loss

Article 8 of the NRR requires Member States to ensure no net loss of urban green space and urban tree canopy cover by 2030 compared to 2024 levels, and then to secure a continuing increasing trend in both from 2031 onwards.

The engagement of housing officials from the Department of Housing, Local Government and Heritage with the NRP, and in particular Article 8, has been unacceptable to date. The Article 8 reporting requirements within the draft NRP have effectively been left blank with the following statement, *"An approach for Article 8 has yet to be completed and submitted to the Interdepartmental Working Group on Cities & Towns".* It is also noted that the Independent Advisory Committee for Nature Restoration received no substantive engagement from officials on urban ecosystems, aside from a preliminary presentation in April 2024. We would consider this to be unacceptable given the urgent need for urban green space and tree cover to adapt to climate breakdown consequences such as exacerbation of the urban heat island effect which ravaged European urban areas during the recent heatwave. Article 8 represents a unique opportunity to increase the liveability of our urban areas and achieve co-benefits of climate adaptation, biodiversity increase and increased public wellbeing.

This lack of engagement is further compounded by the Department's consistently negative approach to the regulation since the Commission's original proposal. The root cause appears to be that the current private developer-led housing strategy is not aligned with the sustainable development approach underpinning the regulation.

In the draft NRP, the Article 8 targets are framed as being in conflict with "*the planned growth and development of our urban areas, including the provision of housing, infrastructure, and social, community, employment or commercial development*." In reality, green spaces constitute critical infrastructure, essential to the health and wellbeing of both citizens and nature, and should be framed as such. It is deeply concerning that urban greening is being presented as being in conflict with infrastructure and housing delivery targets, when both objectives can be achieved in tandem through creative planning and a more compact urban development strategy.

Ireland must urgently establish a new national target for urban green space and urban tree canopy cover to meet its Article 8 obligations under the EU Nature Restoration Regulation. The private sector driven development of housing on urban green space must be reformed in order to deliver denser housing, lower car dependency and greater access to green space and nature for all citizens in urban environments regardless of socio-economic background.

Current local strategies (e.g. Dublin City and Fingal tree plans) show welcome ambition, but lack a binding national framework with quantified baselines, no-net-loss commitments by 2030, and increasing trends thereafter, as explicitly required by Article 8.

The National Planning Framework (Project Ireland 2040) emphasises the provision and enhancement

of urban green space as part of compact growth, healthy communities and green infrastructure, but does not set quantitative national targets for green space or canopy cover.

The EPA-supported work on "protecting and developing Ireland's green and blue spaces" explicitly links improving urban green space provision to delivering NPF objectives, again as guidance rather than binding commitments.

A national policy on urban greening is needed which builds on existing best practice while addressing the legal obligations of the NRR.

A legally binding target of no net loss of urban green space and canopy cover (relative to 2024 levels) by 2030 should be adopted, followed by sustained increases from 2031, integrated into Ireland's National Restoration Plan.

14.2 Planning Policies

The obligations of Article 8 are relevant to future planning decisions in relevant urban areas which must be taken into account by planning authorities. Given that these obligations are already in effect under the NRR it is incumbent on the Minister to ensure that planning authorities give effect to these new legal requirements in planning decisions moving forward.

While noting that An Taisce have expressed serious concerns regarding the disproportionate amount of discretionary power afforded to the Minister under the new Planning and Development Act 2024, it is clear that Ireland already possesses legislative tools, both under the existing Section 28/Specific Planning Policy Requirement (SPPR) framework and the new National Planning Statements, that can be deployed to ensure that the NRL's Article 8 urban greening requirements are implemented by planning authorities without delay. This could assist in development of a coordinated national framework on biodiversity and planning in the built environment.

Under Section 28 of the Planning and Development Act 2000, the Minister may issue binding planning guidelines to which planning authorities and An Bord Pleanála must have regard. Crucially, 2018 amendments to the Act introduced SPPR provisions that must be complied with, not merely considered. Furthermore, planning authorities are now required to explicitly demonstrate in their development plans how they have implemented these guidelines, or explain why they have not.

Although the Planning and Development Act 2024 repeals Section 28, it introduces transitional measures: all existing Section 28 guidelines remain in force unless revoked or contradicted by a National Planning Statement (NPS).

The Minister should already use his authority to issue binding guidance or policy directions to ensure that urban greening under Article 8 of the NRR is incorporated into planning decisions.

14.3 Wildlife Act

The recently commenced Wildlife (Amendment) Act 2023, under Part VA, Section 59B (a)–(c), introduces a new biodiversity duty reporting obligation for local authorities. This includes reporting on actions taken under the National Biodiversity Action Plan (NBAP), which could be expanded or interpreted to encompass urban ecosystem restoration in line with the NRL. While the relationship between the NBAP reporting and the NRL remains to be clarified, it offers a parallel accountability mechanism that could support enforcement or monitoring of urban greening commitments. A new urban greening reporting obligation should be introduced for local authorities under the Wildlife (Amendment) Act 2023, under Part VA, Section 59B(a)-(c).

14.4 Possibilities for Urban Nature Restoration

Urban areas mainly constitute heavily modified environments which are dominated by human activities. Resulting habitat destruction, degradation, fragmentation and disturbance create a challenging environment for many species but despite this many urban areas in Ireland support important areas for biodiversity which should be enhanced in order to contribute to both Article 8 urban greening requirements but also restoration obligations on land and at sea. An enhanced focus on re-establishing ecological corridors and connectivity should also be prioritised.

Planning authorities should require swift bricks in all new urban developments. Swifts are red-listed on Birdwatch Ireland's Birds of Conservation Concern 2020-2026, with population decline linked with loss of nest sites due to building renovations and construction of modern buildings without suitable cavities. This represents a practical example of a proactive project design component which can complement urban greening measures to enhance biodiversity in urban environments. The NRP should prioritise engagement with relevant stakeholders such as the Irish Green and Building Council whose recent BioNeighbour report provides recommendations for embedding biodiversity into residential development, and seek involvement of the Department of Housing, Local Government and Heritage (DHLGH), to ensure Article 8 implementation.

Recommendations:

- Mandate Swift Bricks (for swifts, sparrows, martins) as mandatory in new residential/commercial buildings and other measures designed to restore biodiversity in urban environments.
- Mandate green roofs/walls, native planting, pollinator areas, permeable SuDS, and tree canopy expansion in planning for all urban projects.
- Replace hard surfaces with permeable infrastructure like rain gardens, native meadows, living walls, and tree canopy to manage flooding, cool cities, and support wildlife.
- Expand green-blue networks - Map and connect parks, rivers, canals, urban trees lines, and habitats into ecological corridors with hedgerows and wildlife routes to enable greater ecological connectivity.
- Deliver ambitious nature restoration in urban environments - Urban areas support both important Natura 2000 sites, nature reserves and city parks that should be subject to restoration under the NRP.
- Artificial light at night (ALAN) should be minimised and, where possible, avoided within green and blue corridors, as it can act as a barrier to movement and disrupt ecological connectivity for many species. Dary Sky Ireland guidance, such as within their 'Environmentally Friendly Lighting Guide' should be integrated into the design of nature restoration projects.

14.5 Human Wellbeing

Access to urban green spaces and nature is vital for physical and mental wellbeing. Unfortunately there are significant barriers to many communities' access to nature. Moving forward, authorities must provide equitable opportunities for access to nature and its associated opportunities for stress reduction, exercise, and social connection. Research shows these spaces lower risks of cardiovascular disease, obesity, anxiety, and depression while boosting mood, immunity, and longevity, benefits amplified in deprived areas where health disparities are starkest. Ensuring high-quality, biodiverse green spaces within walking distance of every home would promote inclusive benefits for public health and community resilience.

Access to Green Space and Nature should be considered as a basic human right and as a necessity for physical and mental health regardless of socio-economic background. Deprived areas in particular should be prioritised for new greening measures.

Space should be reclaimed from cars – we should repurpose roads/parking for green corridors, pedestrian/cycling routes, and biodiverse planting. Implementing 15-minute city principles should include access to green spaces.

Please acknowledge this submission and advise us of any further consultation periods.

Is muidne le meas,

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