An Taisce
The National Trust for Ireland

NPWS Review Body

emailed to: reviewofnpws21@gmail.com

30th March 2021

Re: Review of NPWS - Stakeholder survey

A Chara,

An Taisce welcomes the opportunity to comment on the NPWS review consultation.

The public are increasingly aware of the intrinsic value of nature, with many seeking solace from wildlife and nature during the Covid-19 lockdown. In addition, nature is finally being recognised for the vital role it plays in providing clean air and water, pollination, soil health, and carbon sequestration. It can no longer be viewed as an optional add-on. Nature has been demonstrated to be vital in our fight against climate change, and for our physical and mental wellbeing. The time for procrastination on conservation action has long since gone, and biodiversity protection is at a critical juncture.

The review of the NPWS is a vital step in reversing the alarming trends in nature and biodiversity loss in Ireland. The EU Biodiversity Strategy indicates the direction of travel for Member States, and the strategic direction of the NPWS must align with that ambition. We would like to make the following comments and recommendations.

1. Current situation and issues arising

At the outset we would like to recognise the work of the NPWS staff, and the high calibre of the scientific output, particularly reporting on the Birds and Habitats Directives, and the Convention on Biological Diversity. However, it is widely acknowledged that the NPWS are seriously unfunded, leading to a lack of capacity to fulfil their mandate.

This has led to issues such as lack of investigation or prosecution of wildlife crime, lack of consistent input into consultations for aquaculture/forestry and other ecologically sensitive planning consultations. None of our national parks currently have management plans, and are frequently subject to inappropriate and damaging activity like quad bikes, and encroachment of invasive species such as rhododendron. The Article 17 report itself is indicative of the lack of effective protection afforded our most protected habitats and

species. The European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009 required the publication of sub-basin plans for Margaritifera SAC catchments by December 2009, and to update and publish them every 6 years (i.e. in 2015 and 2021 etc.). No plans have as yet been published.

Further to that, in An Taisce we have had numerous anecdotal reports of the difficulties in contacting NPWS rangers to seek advice or report ecological damage.

2. Independent agency

To date the NPWS has been passed from Department to Department, and Minister to Minister, with inadequate political ownership, or indeed interest. We welcome the efforts by Minister Noonan to address this issue.

It is our considered opinion that the NPWS needs to be an independent, non-political agency, similar to the EPA. As part of this structure, there needs to be clear accountability to an executive Board of Directors, similar to the organisational structure of the EPA.

The rationale for this is that the NPWS needs to be autonomous, with a clear 'home' and not subject to the vagaries of cyclical Government reshuffles. Furthermore, it is vital in the midst of a biodiversity crisis that the NPWS be able to clearly articulate the issues independent of direct political influence, and to clearly highlight any failings in the approach taken by Government.

In addition, the Biodiversity Centre should be given similar autonomy and funding, to work in tandem with the NPWS for data gathering and public engagement.

3. Funding and staff

As outlined above, the lack of resources has led to multiple failures of the NPWS to fulfil its mandate. The requirements of the NPWS are broad and resource intensive, and it is vital that it is allocated multi-annual funding which is sufficient to hire the necessary staff and effectively carry out its duties.

Many comparisons have been made between the funding provided for the greyhound and horse racing industries and that for the NPWS, which serve as a stark reminder of just how low a priority biodiversity is in Ireland. In May 2019 the Government announced a biodiversity and climate emergency, but to date no commensurate political action for

biodiversity protection has followed. If the Government is serious about the protection of biodiversity then it is absolutely vital that the funding for the NPWS is significantly increased.

A needs analysis should be carried out to ascertain what level of funding and staffing is necessary for the functions of the NPWS, in addition to a review of the efficacy of the PAF funding to date. A prioritised list of actions should be compiled with a corresponding budget and staff requirement, in order to improve transparency and accountability, and to clearly articulate the requirement for a certain level of staffing and funding, and the consequences of any shortfall.

We would note that circa 80% of government funding for biodiversity was spent on DAFM schemes, but the European Court of Auditors highlighted that these have failed to reverse biodiversity declines on farmland[1]. As such the continued funding of non-results based schemes must be reviewed, and funds should be redirected to actions which will effect the necessary change, such as to work of the NPWS.

4. Ambition

While compliance with the Birds and Habitats Directives and the Wildlife Act should be a key priority for the NPWS, we would also like to see more ambition within the organisation. The minimum the organisation should strive for is legal compliance, but we would like to see wildlife prioritised, encouraged and protected across the board, not just legally protected species and habitats. We would like to see the NPWS manage the risks posed by biodiversity loss and climate change, and provide key steps to reverse the downward wildlife trends, across all species and habitats. We believe that the NPWS should strive towards providing opportunities for nature to thrive, not just the bare legal minimum.

Furthermore, it is vital that the activities and mandate of the NPWS align with the policy ambition of the EU Green Deal, and its attendant Biodiversity Strategy. This will require yet further resources for the NPWS, and this must be factored into the review.

5. Cross sectoral approach

It is vital that biodiversity protection is tackled across all sectors and departments. We would note that the NPWS were only invited to present to the Ag-Food 2030 committee at the behest of the Environmental Pillar, otherwise their views would have not been sought. This is not acceptable in the face of a biodiversity crisis, and given the significant negative impact of intensive agriculture on biodiversity.

[1] https://www.eca.europa.eu/Lists/ECADocuments/SR20_13/SR_Biodiversity_on_farmland_EN.pdf

The EPA are frequently stakeholders in various departments, including having a seat at the Ag-Food 2030 committee table, and playing an active role in groups such as the Nitrates Expert Group. The NPWS should be given equal weight as stakeholders in all departments, and being an independent agency will progress that. The requirement for thorough consultation with the NPWS should be clearly articulated to, and required by, all Government departments, local government and agencies.

6. Legislative powers and enforcement action

The NPWS must be given additional powers to enforce the existing legislation. NPWS rangers should be given additional resources and legislative power to respond to and investigate reports of wildlife crime and to engage with the public on queries related to protected species and habitats to prevent damage, or address ongoing or planned damaging activities.

We welcome the recent increase in the number of cases of prosecution for illegal hedgerow cutting, and would like to see a significant increase in this type of action to provide a credible deterrent for similar unlawful activities.

An Taisce would request you take these comments under consideration.

Is mise le meas,

Elaine McGoff



Natural Environment Officer

An Taisce – The National Trust for Ireland