

NATURE SCORE CARD



Ireland

Ireland has been a member of the European Union since 1973. Its Natura 2000 network consists of 595 sites, covering 19.485 km². Terrestrial sites are covering 9.226 km² (13% of the land area) while marine N2000 sites are covering 10.259 km². The below analysis and recommendations suggest that national authorities still need to make further efforts in order to fully implement the Birds and Habitats Directives and effective conservation of threatened species and habitats to be achieved on the ground.

	<ul style="list-style-type: none"> • Transposition of the Birds and Habitats Directives
	<ul style="list-style-type: none"> • Site designation • Avoid deterioration of sites, disturbance of species and implementation of appropriate assessments • Funding and resources • Promotion of research • Habitats and species monitoring
	<ul style="list-style-type: none"> • Management of sites • Species protection • Landscape connectivity • Non-native species • Stakeholder engagement, public participation and communication

ACTION PLAN FOR NATURE IN IRELAND

Transposition and designation

- Designate offshore Natura 2000 sites and MPAs
- Finalise terrestrial SAC and SPA designation

Prevention of negative impacts

- Enforce national and EU laws that protect species and habitats both inside and outside N2K network.
- Develop effective monitoring and reporting of mitigation measures for developments
- Increased awareness, training and capacity building at a national level of ecology, Article 6(3) and other important articles of BHD in the planning processes
- Tackle wildlife crime
- Adoption of marine spatial strategies
- Develop a national action plan to tackle invasive species

Active management to achieve favourable conservation status

- Finalise development of detailed conservation objectives and develop management plans for sites with actions which are time bound and financially supported with clear indication of responsible authorities
- Undertake site-based surveys to determine threats to red-listed birds during breeding period
- Promote the development of innovative solutions that help to support farm and marine food income e.g. biodiversity branding and certification

Funding

- Increase funding for conservation, law enforcement and training
- Strengthen the capacity of the national nature conservation administration
- Provide a new financial mechanism to allow non-farmers to access funds for conservation in Natura sites

Monitoring and research

- Fill knowledge gaps especially on species and interaction with e.g. aquaculture, forestry, renewable energy etc.
- Development of national species-specific ecological survey methodologies and standards

Stakeholder engagement

- Awareness raising campaigns targeting the general public and policy makers on the importance of our internationally important species, habitats and sites

The information in this scorecard is based on expert analysis from BirdWatch Ireland, Irish Whale and Dolphin Group, Irish Wildlife Trust, Coastwatch, Bat Conservation Ireland and An Taisce. Full details on the following pages.

LEGAL REQUIREMENT	STATUS IN IRELAND
Transposition	<ul style="list-style-type: none"> The transposition of the Birds and Habitats Directives is complete
Site designation Designate and establish sites that form the Natura 2000 network of protected areas <i>Habitats Directive, art. 3 & 4</i> <i>Birds Directive, art. 3 & 4</i>	<ul style="list-style-type: none"> The terrestrial Natura 2000 network is not considered complete. They cover 9.226km², 13% of the land area. The SPAs for Corncrake are still to be designated, and there are still issues with sites that should have been designated first time round but are not, e.g. other mountain ranges and winter roost sites for Hen Harrier. There are also appeals to several designated sites from landowners. The marine Natura 2000 network is also not complete. Marine sites cover 10.259km². Ireland's new Biodiversity Action Plan 2017-2021 states: Action 6.1.1 Complete designation process for Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), in particular, for marine coastal and offshore SPAs The Natura 2000 sites are integrated in Ireland's protected areas system.
Management of sites Establish site protection measures in Natura 2000 sites <i>Habitats Directive, art. 6(1)</i> <i>Birds Directives, art. 4(1) & 4(2)</i>	<ul style="list-style-type: none"> Generic conservation objectives have been completed and detailed conservation objectives are being published for SACs though progress, while welcome, has been slow. No Favourable Reference Values (FRVs) for birds or conservation objectives for SPAs have been set yet but these are urgently needed. Where N2K sites have conservation objectives they are quite detailed – with the exception of raised bogs, where only the active raised bog qualifying interest has been given a conservation objective. The quality of the conservation objectives at site level for marine sites varies. One common issue for marine sites is inadequate information and omission of characteristic species like Zostera beds for some estuaries – eg Lough Swilly. A start was made on producing management plans for specific Natura 2000 sites several years ago. Forty-five plans were published but these have not been officially adopted, are not being implemented and are used mostly as reference documents with the focus instead on defining conservation objectives for sites. Although these plans provide useful background information official, adopted management plans for sites other than raised bogs are badly needed. Where management plans have been prepared (raised bogs) they are quite new. A lot of effort went into the development of these but it is too early to say how they are being implemented. Management plans have not been prepared for some National Parks and this is a gap. For some sites, especially those in public ownership, there are clearly designated management authorities but for most there are not. Many Natura sites are in private ownership or in commonage. There is no reference to climate change in any of the conservation objectives that have been reviewed. In very few examples are there any conservation measures proposed.
Species protection Ensure species protection <i>Habitats Directive, art. 12-16</i> <i>Birds Directive, art. 5-9</i>	<ul style="list-style-type: none"> The link here shows the Species Action Plans that have been developed for a few protected species- https://www.npws.ie/publications/species-action-plans . However, all these plans are for 3 years and are all out of date now though there is a Framework for Corncrake Conservation to 2022. There has been no published review or evaluation of the Plans to determine whether actions were undertaken and to determine the result and what else needs to be done. As far as we are aware, no further survey work has been undertaken to determine population status of the species for which these plans were made. Implementation of the 2009 Conservation Action Plan for Cetaceans in Irish waters appears to have stalled in 2014. Some of the current plans are being implemented but in a piecemeal fashion. E.g. for freshwater pearl mussel there were draft catchment action plans prepared in 2010 but there is no evidence they are being implemented in a coherent manner. There are no plans for many species (fish, snails etc.). The system of protection for birds outside of Natura sites is very weak both inside and outside of the breeding period and this is of great concern. Inside

	<p>of Natura sites, it is also problematic.</p> <ul style="list-style-type: none"> • Permits / derogations for activities impacting protected species are being issued and published for birds but compliance with Article 9 of the Birds Directive is a problem. There is a serious lack of transparency in relation to derogations for bats.
<p>Avoid deterioration of sites, disturbance of species and appropriate assessment</p> <p>Ensure no deterioration of habitats and disturbance to species in Natura 2000 sites</p> <p><i>Habitats Directive, art.6(2)</i></p> <p>Ensure that plans or projects likely to affect Natura 2000 sites are subject to appropriate assessment</p> <p><i>Habitats Directive 6(3)</i></p> <p>Ensure that developments affecting the integrity of the site are not approved unless there are no alternative solutions, and for imperative reasons of overriding public interest and if compensatory measures are taken</p> <p><i>Habitats Directive 6(4)</i></p>	<ul style="list-style-type: none"> • Implementation of the Article 6 (3) procedures to assess projects and plans has improved but further guidance on Art 6(3) is required from the government. • There are issues with compliance in relation to projects being screened out for full appropriate assessment (AA). This is problematic with Part 8 Planning Decisions at Local Authority level but also in other sectors. There are also issues with the Article 6 process for some licenses being rushed through with little or no opportunity for consultation. • Activities Requiring Consent within Natura sites (i.e. burning vegetation) are poorly enforced with a handful of applications for ARCs in the last 15 years though burning in Natura sites occurs every year. • Surveyors/ecologists are hired by developers to do EIA and Natura Impact Statements. Independence is evident in most sectors except in relation to drainage schemes and works relating to water and flood management. • Post-construction monitoring and reporting on mitigation measures to avoid negative impacts on birds and bats is poor especially in relation to wind energy developments. A focus on mitigation measures themselves requires scientific proof of effectiveness. • There are issues with lack of quality of survey work for birds and habitats, lack of training of planning authority personnel in interpretation of the survey results and ecological assessments, and inadequate monitoring. There is a lack of national species-specific ecological survey methodologies. • Within the planning system the requirement for AA Screening is widely recognised – although this is sometimes a box ticking exercise. Some local authorities are clearly better than others. Overall you would expect it to be better considering the length of time it has been around. • The adverse effects on the site are not always correctly assessed as defined by the conservation objectives and status of the site. The quality of the assessment varies quite a bit. • Cumulative impacts are not adequately taken into account especially in relation to aquaculture cases. • Lack of up to date site information and lack of Coastal Zone Management means that it is very difficult to gauge what is happening in a given marine site (where a lot of activity is seasonal or intermittent). This is becoming increasingly difficult as more marine activities are being introduced. • The precautionary principle is mostly not applied. • The Article 6(4) “overriding public interest criteria” has not been used in Ireland as of writing and also compensation measures have not been proposed as far as we are aware.
<p>Landscape connectivity</p> <p>Encourage the management of landscape features to improve the ecological coherence of the Natura 2000 network</p> <p><i>Habitats Directive art. 3(3) & 10</i></p>	<ul style="list-style-type: none"> • Landscape connectivity is not integrated within the Natura 2000 management implementation. • Ireland has Natural Heritage Areas (NHA), Nature Reserves and National Parks which are stepping stones in the landscape but are badly managed and do not receive the same level of attention as Natura sites. They could cover the requirement of landscape connectivity but are being chipped away. • There is no investment in or maintenance of the NHA network. • There is no system in Ireland for the designation of local areas of biodiversity value. • Ireland has not transposed the Marine Strategy Framework Directive requirement to set up a coherent network of Marine Protected Areas, though legislation to do so has been promised for years.
<p>Funding and resources</p> <p>Identify funding needs</p> <p><i>Habitats Directive, art. 8</i></p>	<ul style="list-style-type: none"> • Ireland has a Prioritized Action Framework (PAF): https://www.npws.ie/sites/default/files/general/PAF-IE-2014.pdf but the PAF is quite unclear on the total amount of funding required for Natura 2000. • There is no dedicated budget to cover Natura 2000 needs. The budget comes from different sources nationally and from EU funds, mostly CAP and Rural Development Funds. • There is absolutely not sufficient staff dedicated to Natura 2000. The National Parks and Wildlife Service which coordinates the enforcement of

<p>Habitats and species monitoring</p> <p>Undertake monitoring of the conservation status of habitats and species of Community importance</p> <p><i>Habitats Directive, art.11</i></p>	<p>national and EU nature laws is chronically underfunded.</p> <ul style="list-style-type: none"> • There are several gaps in monitoring for bird species where there are very long gaps since the last survey (e.g. Chough...) and inadequate survey coverage for some species (e.g. Dunlin, Golden Plover). Site-based surveys to determine threats to red-listed birds during the breeding period are urgently required. • Article 17 reporting shows how Ireland falls short in terms of monitoring. It is not clear how a given Natura site and habitats/species within it are faring. Cumulative impacts for sites are not adequately presented such as in areas with rapidly increasing and unlicensed pressures like seaweed harvesting and recreational pressures in addition to the licensed activity. 16% of animal species assessed have 'unknown' status in 2013 Article 17 report. • Long term data is lacking for over half of bird species assessed in 2014. • Some habitat types are also lacking survey and monitoring (upland habitats are not completed). • The quality of the assessments of conservation status and the underlying data vary. • Data are mostly publicly available but the timeliness of the release of data is an issue.
<p>Promotion of research</p> <p>Encourage research and scientific work</p> <p><i>Habitats Directive, art. 18</i> <i>Birds Directive, art. 10</i></p>	<ul style="list-style-type: none"> • The scientific community receives support for research projects to assess the status of threatened species, for some species. • There are significant research gaps due to lack of funding.
<p>Non-native species</p> <p>Ensure that introductions of non-native species do not prejudice native habitats and species</p> <p><i>Habitats Directive, art. 22</i> <i>Birds Directive, art. 11</i></p>	<ul style="list-style-type: none"> • There are no identified coordinated national management measures to address invasive species. There are however some measures being implemented through some state agencies and at local authority level. • The issue of invasive species in the marine environment especially is potentially problematic.
<p>Stakeholder engagement, public participation and communication</p> <p>Stakeholder engagement and public participation are key to ensuring effective implementation</p>	<ul style="list-style-type: none"> • Stakeholder participation during the site designation process has not received the required attention or resources. This has resulted in feelings of ill will among landowners and farmers, feeling that designations have been imposed on them. • There has been inadequate public participation as part of the Article 6 (3) process for some activities and developments. In addition, decisions have been granted by Ministerial order in some cases that have not had adequate public transparency or public consultation. • Public participation, availability of documentation and transparency in decision-making impacting nature varies widely, depending on the sector. In forestry, agricultural activities, aquaculture and flood control measures, it is very poor. • Ireland has not undertaken sufficient awareness raising activities on Natura 2000 at the national/regional level that stakeholders are aware of. • There is no Natura 2000 communication strategy for the local level (site level). Also, there is very little participation in other forms of management. For example – if someone seeks a derogation to shoot protected animals or to damage a habitat which falls into the wildlife service remit to grant, there is no public consultation and very little transparency of published information.

RECOMMENDATIONS FOR IRELAND

- Greater enforcement of the Birds and Habitats Directives through the planning processes, licensing, Article 6(3), Activities Requiring Consent, etc. Significantly, increased transparency and public consultation is also required in decision making.
- Greater protection for Annexed species outside of Natura Sites.
- Develop a framework for protection for Birds of Conservation Concern in Ireland both inside and outside Natura sites.
- Increase in funding for conservation, law enforcement, and ecological training in relation to the Birds and Habitat Directives:
- Strengthen the capacity of the national nature conservation administration, ie National Parks and Wildlife Service (NPWS) in Ireland. Provide real legislative clarity in relation to the responsibility of the NPWS for enforcement and conservation management in general terms in respect of effective implementation of the Birds and Habitats Directive obligations, and also provide legal clarity on its enforcement responsibility in relation to breaches of licencing or other conditions imposed with permissions, permits and licences issued by other bodies, initiates survey and monitoring work, oversees management of Natura sites etc.
 - More funding is required for this body.
 - More funding for survey and monitoring work to understand the ecology and behaviour of species in an Irish context (fill knowledge gaps especially on species and interaction with e.g aquaculture, forestry, renewable energy etc.).
 - More funding for the development of detailed conservation objectives and management plans where necessary.
 - Urgently fund site-based surveys to determine threats to red-listed birds during breeding period.
 - Greater use of existing LIFE funding and EMFF funding for conservation.
 - Provide a new financial mechanism to allow non-farmers to access funds for conservation in Natura sites.
 - Finalise development of detailed conservation objectives and develop management plans for sites which are timebound and financially supported with clear indication of responsible authorities.
- Greater political will to protect nature and awareness raising of the benefits of the BHD and Natura 2000 is urgently required in Ireland.
 - Funding for more awareness raising campaigns in Ireland targeting the general public and policy makers on the importance of our internationally important species, habitats and sites. Natura sites, protected species, are seen as the problem rather than something to be proud of.
 - Awareness and education of the benefits of the BHD to species, habitats and sites and to tourism, agriculture, fisheries etc. that rely on properly functioning ecosystems. Long-term strategy planning is also required. We need to move from the narrative that nature is the problem and towards nature is the solution.
- Increased awareness, training and capacity building at a national level of ecology, Article 6(3) and other important articles of Birds Directive and Habitats Directive in the planning processes
 - Staff training, greater ecological expertise, etc. the rules (screening for Appropriate Assessment, full appropriate assessment, EIA) properly-level playing field for implementation in Ireland.
- Tackle wildlife crime.
 - In Ireland increased communication and collaboration between relevant departments is needed in particular to tackle wildlife crime, i.e. at present very poor communication between NPWS and Garda (Irish police),
 - Establish a Wildlife Liaison Officer in An Garda
 - Ensure that wildlife crime is on the national agenda.
- Greater coherence between BHD and marine policy

- Especially in relation to the EUs maritime territory. That would involve the adoption marine spatial strategies which consider conservation and cross compliance between the BHD and the Common Fisheries Policy.
 - Designate Marine Protected Areas in Ireland (none so far).
- Develop a national action plan to tackle invasive species
- In the case of designated semi-natural habitats there needs to be greater alignment between conservation strategies and rural development. The economic viability of extensive farming is essential to maintain HNV farmland. Best practice examples are required to promote the development of market mechanisms that help to support farm and marine food income e.g. the development of Biodiversity branding / certification.