



Fair Seas Ireland's response to:

**Ireland's 4th National Biodiversity Action Plan Draft for Public Consultation**

*Fair Seas is a group of Ireland's leading environmental non-governmental organisations and networks seeking to protect, conserve and restore Ireland's unique marine environment.*

*Fair Seas partners: BirdWatch Ireland, Coastwatch, Coomhola Salmon Trust, Irish Environment Network, Irish Whale and Dolphin Group, Irish Wildlife Trust, Sustainable Water Network.*

Submitted 09/11/2022

Fair Seas welcomes the opportunity to respond to the latest National Biodiversity Action Plan (NBAP), and agree that a successful plan *'will set the national biodiversity agenda for the period 2023-2027 and aims to deliver the transformative changes required to the ways in which we value and protect nature'*.

Though the timeframe of the NBAP is short (2023-2027), it is encouraging that the bigger picture vision for Ireland's biodiversity is also stated *'Ireland in 2050 – A Vision for Biodiversity Biodiversity in Ireland is valued, conserved, restored and sustainably used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people'*.

Not forgetting the many 'quick wins' that the Government may proceed with immediately to the direct and instantaneous benefit of biodiversity in Ireland, recognition that restoring Ireland's biodiversity is a long term project, is necessary among all stakeholders and society if we are to be successful in our goal.

However, we are concerned that the Actions stated in the Plan lack sufficient ambition or detail to drive and deliver a reversal of biodiversity loss and decline in Ireland. Furthermore, there is no recognition of the intrinsic value and rights of nature in the plan. Instead, there is an overly 'process' heavy focus of the Targets and Actions, whereas, what is needed are specific 'SMART'<sup>1</sup> commitments to legal, policy, technical, project and resource changes that will benefit and value biodiversity in a real, direct and timely manner.

Below is a list of 24 changes which Fair Seas believes would strengthen the marine biodiversity aspects of the NBAP, and increase the effectiveness of Actions taken to help Ireland's marine biodiversity not only survive, but thrive.

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<sup>1</sup> SMART: Specific, Measurable, Achievable, Relevant, Time Bound

**OBJECTIVE 1: Adopt a Whole of Government, Whole of Society Approach to Biodiversity**

**(i) Suggested addition to Objective 1**

New Target (1B)	Action	Indicator
<p><b>By 2026, one billion euros <i>additional</i> funding for the lifetime of this NBAP</b> will be allocated to relevant departments, state agencies, local authorities and institutions to ensure local, regional and national level biodiversity conservation and restoration projects are progressed in a timely manner to halt and reverse biodiversity loss and decline on land and in the sea as soon as possible.</p>	<p><b>Develop a granting process through which to allocate an additional one billion euros</b> to departments, state agencies, institutions, local authorities and projects, based on the recommendations of the cross departmental review and other information gathering 1A Action and Targets.</p>	<p>The proportion of the one billion euros funding allocated to halt and reverse biodiversity loss and decline.</p>

**Rationale:** The proper financing and resourcing of biodiversity protection and conservation across Government departments is critical to the successful implementation of the NBAP. Therefore, it is encouraging that the first Outcomes (1a & 1b) of the plan are focused on capacity, resourcing and financing conservation and restoration in Ireland. However, it is not clear how the Actions detailed for Outcome 1A or 1B will address the most important aspect of addressing biodiversity loss, that is - from where and how much additional funding this Government ambition will be receiving on a yearly basis and for what departments/state agencies/organisations. **If the NBAP is to be successful, the Targets and Actions outlined in Outcome 1A & 1B must be more specific regarding how much, from where and when the necessary additional financial funding will be administered and what those funds will deliver for biodiversity.** One billion euros over a four year period to restore biodiversity in Ireland to past, more natural baselines is a significant but still relatively small financial support package to protect the biodiversity and ecosystems on which the health and prosperity of our society heavily relies.

**(ii) Suggested change to Objective 1**

Target 1B1	Action	Indicator
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<b>By 2023, the Government has introduced a statutory requirement for National Biodiversity Action Plans.</b>	DHLGH will place the National Biodiversity Action Plan on a statutory footing	A NBAP bill is passed into law.
<p><b>Rationale:</b> Putting the NBAP on a statutory footing is critical to its short term (2027) and long term (2050) success. <b>A legislative grounding for the NBAP will help ensure that the Actions and Targets detailed within it are adhered to, and importantly, it will exponentially increase the degree to which the Government can be held accountable for its delivery.</b> In passing the Climate Action and Low Carbon Development (Amendment) Act (2021), the Government has recognised the importance of using the primary legislative approach in tackling the global climate emergency. On the same basis, the Government must provide the same legislative foundation for tackling the global biodiversity emergency.</p>		

(iii) Suggested addition to Objective 1		
New Target 1C	Action	Indicator
<p><b>By 2026, measures for sustainability and biodiversity implemented under the Common Fisheries Policy are delivering positive outcomes for biodiversity.</b></p>	<p><b>Government Ministers will engage proactively with the EU to ensure measures for sustainability and biodiversity implemented</b> under the Common Fisheries Policy are delivering positive outcomes for biodiversity.</p> <p><b>Government Ministers will engage proactively with the EU to ensure the poor implementation of the CFP is not a barrier to delivering positive outcomes for biodiversity.</b> (e.g., progressing MPA conservation management measures in Ireland’s offshore region).</p>	<p>Proportion of Irish fish stocks managed sustainably and within scientific advice limits increases.</p> <p>Number of fisheries conservation measures introduced into Ireland’s offshore MPAs.</p>
<p><b>Rationale:</b> There is no mention in Outcomes 1C of the root causes and key drivers of marine biodiversity loss or how they will be tackled by each responsible department. Accepting that issues regarding marine biodiversity loss are addressed later in the NBAP in Objective 2, this remains a glaring omission from this section considering much of Ireland’s biodiversity occurs in</p>		

the marine environment. Ireland’s own MSFD assessment<sup>2</sup> states that fishing is the predominant pressure and threat on the marine environment including biodiversity. Therefore, **Outcome 1B should include a Target regarding the performance of the Common Fisheries Policy with a clear Action to improve the efficacy and implementation of the sustainability and biodiversity elements of the EU Directive.** The rigorous and full implementation of the Common Fisheries Policy (CFP) is essential to achieve the sustainable management of all commercially exploited species, thereby putting an end to overfishing and driving the recovery of fish stocks. The CFP should also contribute to the protection of the marine environment, and in particular to the achievement of good environmental status (GES) of wider seas.

The CFP provides the mechanisms for implementing conservation measures within offshore and inshore MPAs, including fisheries management. **Ireland must pursue and implement all aspects of the CFP to help secure well-managed protected areas, healthy seas, and a strong, sustainable fishing industry.**

#### (iv) Suggested addition to Objective 1

New Target (1D)	Action	Indicator
Citizens’ Assembly on Biodiversity Loss and Children and Young People’s Citizen Assembly on Biodiversity Loss to contribute to the 4 <sup>th</sup> NBAP	Recommendations from the Citizens’ Assembly on Biodiversity Loss and the Children and Young People’s Citizen Assembly on Biodiversity Loss to be incorporated into the final version of the NBAP	Inclusion of both sets of recommendations in NBAP

**Rationale:** Children and Young People’s Citizen Assembly on Biodiversity Loss is following similar timelines to the Citizens’ Assembly on Biodiversity Loss which will conclude its work and submit its report by December 2022. The 4<sup>th</sup> NBAP has outlined that “recommendations from the Citizens’ Assembly on Biodiversity Loss will be reviewed and incorporated into the final version of the NBAP”. However, in relation to the Children and Young People’s Citizen Assembly, the NBAP simply refers to the work that is currently underway on convening the assembly, and the convening of an advisory panel of young people to further develop the framework and terms under which the Assembly will work. While the timeline of this assembly may not have been known at the time of publishing the NBAP, the Children and Young People’s Citizen Assembly’s 58 Calls to Action which are grouped under 7 themes<sup>3</sup>, should also be incorporated into the final version of the NBAP. Failure to do this would undermine the legitimacy and credibility of running assemblies for our young people, the generation which will face increasing difficulties as a result of our decisions and lack of action on the emergencies of our time, including biodiversity loss and climate.

<sup>2</sup> [Marine Strategy Framework Directive. Update to Ireland’s Marine Strategy Part 1: Assessment, Determination of Good Environmental Status, and Environmental Targets.](#)

<sup>3</sup> <https://cyp-biodiversity.ie/wp-content/uploads/2022/11/CYPABL-Calls-to-Action.pdf>

The intrinsic value of nature and the right of nature to exist beyond focussing on nature’s direct commercial use or indirect ecosystem contributions to human life is not recognised in the actions within the plan. This is especially concerning when there is a NBAP target on preparing a national assessment of ecosystem services (5D), but there is no balance to this through the recognition of the rights of nature. The Calls to Action from Children and Young People’s Citizen Assembly on Biodiversity Loss are particularly relevant in this regard as their Governance theme recognises the need ‘To put biodiversity and the rights of nature at the heart of the decisions that we make’ and urge that ‘Every decision being made must consider biodiversity and the rights of nature’.

<b>(v) Suggested change to Objective 1</b>		
<b>Target 1D2</b>	<b>Action</b>	<b>Indicator</b>
By 2027, public awareness on biodiversity is increased by 20% against a 2023 baseline	DHLGH and other relevant bodies will build on existing biodiversity and awareness barometers to gauge the public <b>awareness and connection</b> to biodiversity	<b>Barometers indicate a 20% increase in public awareness and connection to biodiversity and nature.</b>
<p><b>Rationale:</b> For this Target to be measured there also needs to be a re-evaluation of public awareness on biodiversity in 2027 - none of these 3 action numbers (1D1-1D3) refer to measurement in 2027 or how that might be done. We would suggest adding an indicator on measuring public awareness on biodiversity in 2027 and comparing that with the baseline.</p> <p>We would also suggest that there needs to be alignment on what the baseline is and what measurement is focussed on - the term 'public awareness on biodiversity' is used in the Target description but the term 'public connection to biodiversity' is used in the Action description. We believe both are important and central to supporting societal responsibility for action on biodiversity. Awareness can lead to greater understanding, while connection can lead to greater concern and desire to act</p>		

<b>(vi) Suggested change to Objective 1</b>		
<b>Target 1D4</b>	<b>Action</b>	<b>Indicator</b>

By 2024, a Biodiversity Citizen Science Strategy is published and in progress	The NBDC will produce and implement a Biodiversity Citizen Science Strategy, <b>which will build on existing public data collection efforts conducted by NGOs</b> , to promote citizen engagement with both terrestrial and marine biodiversity and to develop greater awareness of the value of local biodiversity	Publication of and progress against Biodiversity Citizen Science Strategy; National Biodiversity Indicators (NBI)- A.2.iii. Number of biological records submitted to national citizen science-driven monitoring schemes <b>Central database housing this data to be publicly available</b>
<p><b>Rationale:</b> We would suggest that this action should build on existing data collection efforts by NGOs that involve the public and have already built an inventory of data e.g. BirdWatch's Garden Bird Survey, BirdTrack App, CoastWatch's annual coastal surveys, etc.</p>		

(vii) Suggested change to Objective 1		
Target 1D5	Action	Indicator
By 2023, a baseline funding level for community biodiversity initiatives is established	DHLGH, DRCD and DECC will continue to build support for community biodiversity initiatives such as the Small Recording Projects grant scheme, Community Foundation Ireland Environment and Nature Fund, LEADER, Local Agenda 21, Shared Island Fund, Peatlands Community Engagement Scheme and GSI Geoheritage Grant Scheme	Number of action taken to support community biodiversity initiatives <b>Assessment of the impacts of actions supported</b>
<p><b>Rationale:</b> This indicator, if focussing only on the number of actions taken to support community biodiversity initiatives, seems vague and we would suggest that the indicator should include an assessment of the impact of these actions that are supported.</p>		

(viii) Suggested change to Objective 1		
Target 1D6	Action	Indicator

All Local Authorities are supported to carry out biodiversity related projects on an annual basis by 2027	DHLGH will continue to support Local Authorities biodiversity projects through the Local Biodiversity Action Fund throughout the lifetime of this Plan	Number of Local Authorities awarded funding annually. <b>Report amount of funding awarded to each Local Authority on annual basis.</b> <b>Assessment of the impact of funding provided to Local Authorities</b>
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**Rationale:** This indicator as it stands does not provide insight into the impact of the funding awarded. At very least, the indicator should quantify the amount of funding going to each local authority. However, more importantly, this indicator doesn't capture the impact that funding is having or what it is being used for. The responsibility for providing this information may lie with the local authority but ultimately should be reflected in this indicator. Providing this information would increase transparency.

(ix) Suggested change to Objective 1		
Target 1D7	Action	Indicator
The Business for Biodiversity platform receives support to establish and grow by 2026	DHLGH and DAFM will fund, support, and promote the work of the Business for Biodiversity platform during its initial set up phase of three years	Amount of funding provided to Business for Biodiversity platform. <b>Assessment of the impact of funding and support provided to Business for Biodiversity platform</b>
<p><b>Rationale:</b> While this indicator description allows for more insight than the previous target by detailing the amount of funding, again, it fails to provide any indication of how this funding is being used, and fails to capture its impact. This insight is necessary to understand the effectiveness of funding and supports, and to increase transparency.</p>		

(x) Suggested change to Objective 1		
Target 1E1	Action	Indicator
<b>By 2026, new legislation (including amendments to current law) arising from a</b>	<b>DHLGH will complete a review of Wildlife legislation</b> that exists in Ireland and recommend new laws or	Publication of review, recommendations and

<p><b>review of Ireland’s current Wildlife legislation is in place</b></p>	<p>amendments to ensure Ireland has the relevant and necessary legislative foundation to halt and reverse biodiversity loss in Ireland.</p> <p><b>Review of Ireland’s Wildlife Act (1976)</b> to widen the scope and strengthen the level of protection species receive under this legislation.</p>	<p>subsequent associated new legislation or amendments.</p> <p>Number of recommendations implemented from the Wildlife Act (1976) review.</p>
<p><b>Rationale:</b> A review of Irish Wildlife legislation (Target 1E1) is welcome and necessary. However, <b>this Target and Action must explicitly state the remit and scope of such a review process and include a list of current legislation which will be reviewed.</b> This Target should also reference the specific review of the Irish Wildlife Act (1976) which the Government has already committed.</p>		

## OBJECTIVE 2: Meet Urgent Conservation Restoration Needs

### (xi) Suggested addition to Objective 2

New Target 2A	Action	Indicator
Enhanced implementation of the Habitats and Birds Directives by 2024	<b>DHLGH will publish detailed site specific management plans for all SACs and SPAs.</b>	Number of sites in respect of which site specific management plans are published

**Rationale:** Fair Seas welcomes Outcome 2A *‘The protection of existing designated areas and species is strengthened and conservation and restoration within the existing protected area network are enhanced’*. More specifically, enhanced implementation of the Habitats and Birds Directives is a critically important piece of the puzzle in tackling biodiversity loss and decline in Ireland, as well as doing our part in the EU and global efforts to protect and conserve wildlife. Furthermore, the publication of detailed site-specific conservation objectives for all SACs and SPAs is also welcome and long overdue. However, these Actions do not address the key issue regarding the effectiveness of the Natura 200 network, which is their current lack of effective management. **Site-Specific Conservation Objectives can’t be realised without the development and implementation of evidence driven management plans which are effective in protecting the features for which they were designated.**

### (xii) Suggested change to Objective 2

Target 2A5	Action	Indicator
In line with the EU Biodiversity Strategy, habitats and species under the Habitats and Birds Directives show no deterioration in conservation trends and status by 2030, and at least 30% of those not in favourable status will reach that status or show a positive trend	DHLGH and other relevant organisations will support species and habitat-specific conservation <b>and restoration programmes</b>	Trends in the status of the protected habitats and species under the Directives are improving in line with achieving the 30% target by 2030

**Rationale:** Species and habitat-specific conservation programmes are fundamental to not only halting biodiversity loss and decline, but allowing and enabling it to recover from decades of overexploitation and poor management. **Therefore, the delivery of these conservation programmes must explicitly state their remit to pursue species and habitats restoration as well as conservation.** Furthermore, this Target and Action must explicitly state the inclusion of marine based conservation and restoration programmes upon which the future health of some marine habitats and species acutely rely such as the recovery of native oysters and seagrasses. The importance of restoration as well as conservation in tackling biodiversity loss is highlighted later by the new EU Nature Restoration Law referenced later in the NBAP.

### (xiii) Suggested addition to Objective 2

New Target 2E	Action	Indicator
Adherence to statutory targets under the EU Biodiversity Strategy and EU Nature Restoration Law.	<b>DHLGH and other relevant organisations will support projects focused on restoring marine habitats and species including native oysters, seagrass and saltmarsh.</b>	Number of marine restoration projects supported.

**Rationale:** A National Restoration Plan to meet EU Biodiversity Strategy 2030 and EU Nature Restoration Law targets **must include a diverse range of suitable marine species and habitats which are prioritised for restoration** (e.g., native oyster, seagrass meadows, saltmarsh, macro-algae).

### (xiv) Suggested addition to Objective 2

New Target 2F1	Action	Indicator
By 2026, Ireland is meeting all requirements for its transitional, coastal, and marine environment under the Water Framework Directive (WFD) and the Marine Strategy Framework Directive (MSFD), thereby achieving and maintaining High or Good	<b>DHLGH will achieve High or Good Ecological Status, and Good Environmental Status under all descriptors</b> and criteria within transitional, coastal, and marine waters <b>by implementing ambitious and effective programmes of measures</b> , acting further to	Percentage of Ireland's transitional, coastal, and marine environment reported to be in High or Good Ecological Status under the WFD and Good Environmental Status under the MSFD; Percentage of species and habitats newly achieving Good

Ecological Status and Good Environmental Status, respectively.	support OSPAR Decisions, Recommendations and Other Agreements, and to bolster marine biodiversity throughout the NorthEast Atlantic region.	Environmental Status, while maintaining existing good status results for marine flora, fauna, and habitats
<p><b>Rationale:</b> The Marine Strategy Framework Directive (MSFD) is an important EU legislative driver for obtaining ‘<i>ecologically diverse, dynamic oceans and seas which are clean, healthy and productive</i>’. Unfortunately, Ireland failed to achieve this aim or meet Good Environmental Status criteria (GES) for over half (6 out of 11) of the descriptors in the latest 2020 assessment<sup>4</sup>.</p> <p><b>Ireland needs an ambitious and effective Programme of Measures that will deliver GES including new projects and initiatives to address current gaps and failures identified in the MSFD reporting process.</b> Without this, there is a real risk that Ireland’s marine environment and GES status will be in much the same position, if not worse, by the next assessment in 2026. Given the intertwined biodiversity and climate emergencies; there is no time to waste, strong and effective action to protect and restore our seas is urgently needed.</p> <p>To be successful, development of the new programme of MSFD measures to bring about GES across all descriptors should be <b>based on an effectiveness evaluation of current measures, and address shortcomings which led to GES not being achieved when assessed in 2020.</b></p>		

(xv) Suggested addition to Objective 2		
New Target 2F2	Action	Indicator
By 2026, Ireland is meeting all requirements for its transitional, coastal, and marine environment under the Water Framework Directive (WFD) and the Marine Strategy Framework Directive (MSFD), thereby achieving and maintaining High or Good Ecological Status and Good Environmental Status, respectively.	DHLGH will adopt and complete the integration of Ireland's marine environmental targets established under the MSFD, and Water Framework Directive Status Objectives, into the planning, consenting and operational systems for human activities in Ireland's maritime area <b>by reviewing and amending the National Marine Planning Framework (NMPF) ensuring it is spatially prescriptive and employs an</b>	Attainment of all of Ireland’s environmental targets under the MSFD, including through the implementation of an updated National Marine Planning Framework; Further establishment of new environmental targets under MSFD Descriptors 1 to 11, as required to achieve and maintain Good Environmental Status; No degradation of transitional and coastal water

<sup>4</sup> [Marine Strategy Framework Directive. Update to Ireland’s Marine Strategy Part 1: Assessment, Determination of Good Environmental Status, and Environmental Targets.](#)

	<p><b>ecosystem-based approach</b> as required under the EU Marine Spatial Planning (MSP) Directive. This will ensure the sustainable use of resources and the conservation of marine biodiversity and ecosystem services in Ireland.</p>	<p>status under the WFD as a result of human activities</p>
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**Rationale:** According to the EU Directive on Maritime Spatial Planning<sup>5</sup> Member State’s marine spatial plans are legally required to implement an ecosystem-based approach and to contribute to the achievement and maintenance of Good Environmental Status, as defined by the MSFD. However, a recent independent report<sup>6</sup> showed how Ireland’s National Marine Planning Framework (NMPF) fails to employ the ecosystem-based approach to planning, or integrate a spatial element or prioritisation of activities, thereby failing to meet a number of the planning requirements in the EU Marine Spatial Planning (MSP) Directive. Without an ecosystem-based approach to consenting and regulating activities and developments at sea, it is impossible for the NMPF to *‘integrate MSFD or WFD targets into planning, consenting and operational systems for human activities in Ireland’s maritime area or ensure the sustainable use of resources and the conservation of marine biodiversity and ecosystems services’* as outlined in this NBAP Action. **The NMPF needs to be reviewed and amended to explicitly address these concerns.**

(xvi) Suggested change to Objective 2		
Target 2F3	Action	Indicator
<p>By 2026, not only is Ireland meeting all requirements for its transitional, coastal, and marine environment under the Water Framework Directive (WFD) and the Marine Strategy Framework Directive (MSFD), (thereby achieving and maintaining High or Good Ecological Status and Good Environmental Status, respectively), <b>but goes further than other European and</b></p>	<p>DHLGH will enact and implement comprehensive legislation enabling the designation and management of Marine Protected Areas (MPAs) and the expansion of Ireland’s network of area-based conservation measures in the coastal and marine environment. This legislation will cover species and habitats beyond those listed in EU Directives and also</p>	<p>Number and spatial coverage of designated MPAs within Ireland’s maritime area reaching 30% by 2030 <b>and achieving ‘fully’ protected status for 10% of Irish waters;</b></p> <p>Number of species, habitats and other features beyond those listed under the Wildlife Acts and the Birds and Habitats Directives, for which MPAs have been designated;</p>

<sup>5</sup> [EU Maritime Spatial Planning Directive Directive 2014/89/EU](#)

<sup>6</sup> [Walsh, C. \(2022\) ‘An Evaluation of Ireland’s Marine Spatial Plan – The National Marine Planning Framework’. Sustainable Water Network \(SWAN\). May 2022.](#)

<p><b>International biodiversity by not only protecting 30% of Irish waters by 2030, but achieving 10% of Irish waters as ‘fully’ protected.</b></p>	<p>features providing ecosystem services including climate change mitigation and adaptation, and capturing transboundary considerations where possible, thereby acting further to support MSFD requirements, the OSPAR Convention for the Protection of the Marine Environment of the North-East Atlantic, and marine biodiversity throughout the region.</p>	<p>Associated substantive contribution of Irish MPA sites to the OSPAR MPA network.</p> <p><b>No. of new conservation measures in Natura 2000 marine sites.</b></p>
<p><b>Rationale:</b> Fair Seas welcomes inclusion of this Target and Action. The expansion of Ireland’s current small MPA network (approx. 2.1% of Irish waters) under new national legislation is one of the biggest opportunities to properly protect, conserve and restore marine biodiversity around this Island.</p> <p>However, the timeframes for delivery of new national MPA legislation, upon which the subsequent process of site selection, designation and management implementation relies, are clearly lagging compared to progress on other Government commitments such as tackling climate change, or increasing Ireland’s marine renewable energy generation. <b>Therefore, it is essential that the Irish Government expedite the MPA legislative, designation and management processes as soon as possible so that this Action has a positive impact on Ireland’s marine biodiversity within the span and scope of the NBAP.</b></p> <p>Increasingly more research is confirming that it is only when designated areas <i>are</i> effectively managed for nature and achieving their conservation objectives, that they can positively benefit nature and contribute to GES<sup>7</sup>. This flow of ecosystem benefits from effectively managed MPAs can take time to appear as natural habitats, species and ecosystem functioning recovers. Therefore, Fair Seas believes the current Programme for Government commitments on MPAs<sup>8</sup> <b>should also include a commitment to 10% ‘fully’ protected</b> to ensure MPA network is successful in delivering not only site specific conservation outcomes, but the many other ecosystem and societal co-benefits (e.g., climate change mitigation and adaptation, coastal protection, sustainable food source) of having a well-managed and ecologically coherent network of MPAs also.</p>		

<sup>7</sup> [Jacquemont, Juliette, et al. "Ocean conservation boosts climate change mitigation and adaptation." One Earth 5.10 \(2022\): 1126-1138.](#)

<sup>8</sup> [Programme for Government \(2020\)](#) MPA commitments; ‘to develop comprehensive legislation for the identification, designation, and management of Marine Protected Areas (MPAs) in Irish territorial waters. ‘We will realise our outstanding target of 10% under the Marine Strategy Framework Directive as soon as is practical and aim for 30% of marine protected areas by 2030’

Furthermore, conservation management measures for Ireland’s marine Natura 2000 sites are also critical in ensuring that there are no significant adverse effects from marine fisheries and aquaculture in and adjacent to EU Natura 2000 sites’. **Therefore, the development and implementation of conservation measures for marine Natura 2000 sites must become an organisational priority for NPWS.**

(xvii) Suggested change to Objective 2		
Target 2F5	Action	Indicator
<p>Commercial fish and shellfish stock levels are maintained or restored to levels that can produce maximum sustainable yield as soon as possible, and <b>no later than 2023.</b></p> <p><b>Ireland will always pursue and distribute commercial fish and shellfish fishing quotas in line with the scientific advice and will not fish above these advised limits.</b></p>	<p>DAFM and other relevant stakeholders will continue to implement the EU's Common Fisheries Policy in order to provide for the long-term conservation and survivability of fish and shellfish stocks and marine biodiversity. Ensure the ongoing implementation of both Multiannual Plans and remedial measures for vulnerable stocks, which aim to ensure that the exploitation of living marine biological resources restores and maintains populations of harvested species above levels that can produce maximum sustainable yield.</p>	<p><b>Number of fish and shellfish stocks that are being fished sustainably and in accordance with scientific advice.</b> Number of fish and shellfish stocks newly achieving or maintaining Good Environmental Status under the MSFD.</p>
<p><b>Rationale:</b> The rigorous and <b>full implementation of the Common Fisheries Policy (CFP) is essential to achieve the sustainable management of all commercially exploited species</b>, thereby putting an end to overfishing and driving the recovery of fish stocks. Accordingly, Ireland must <b>always pursue and distribute commercial fish and shellfish fishing quotas in line with the scientific advice and will not fish above these advised limits.</b> The CFP should also contribute to the protection of the marine environment, and in particular to the achievement of good environmental status (GES) of wider seas.</p> <p>The Irish Government has committed to fully implementing the CFP, as well as expanding Ireland’s network of Marine Protected Areas (MPAs). Fisheries management in current and future MPAs (offshore and inshore) is crucial to secure an ecologically coherent and well-managed network of MPAs, as well as the broader long term health and resilience of our marine environment.</p>		

The CFP provides the mechanisms for implementing conservation measures within offshore and inshore MPAs, including fisheries management. **Ireland must pursue and implement all aspects of the CFP to help secure well-managed protected areas, healthy seas, and a strong, sustainable fishing industry.**

**It is also worth noting that under current EU law, commercial fish and shellfish stock levels should already be maintained or restored to levels that can produce maximum sustainable yield. Therefore, the timeframe for delivering this should be as soon as possible, but no later than 2023.**

(xviii) Suggested change to Objective 2		
Target 2F7	Action	Indicator
As soon as possible and <b>no later than 2023</b> , commercial fisheries and aquaculture in Ireland are carried out without causing significant adverse effects on EU Natura 2000 sites or their qualifying marine habitats and species	DAFM, DHLGH and other relevant stakeholders will not only implement measures to ensure that there are no significant adverse effects from marine fisheries and aquaculture in and adjacent to EU Natura 2000 sites, <b>but implement conservation management measures to ensure all Natura 2000 sites achieve their site specific conservation objectives.</b>	Percentage of marine Natura 2000 sites in Ireland for which all site specific conservation objectives (SSCOs) continue to be met; Number of Natura 2000 qualifying marine habitats and species found to be in favourable conservation status through cyclical monitoring and assessment  <b>No. of new conservation measures in Natura 2000 marine sites.</b>
<p><b>Rationale:</b> Please see Rationale outlined in '(v) Suggested addition to Objective 2' above.</p> <p>Conservation management measures for Ireland's marine Natura 2000 sites are also critical in ensuring that there are no significant adverse effects from marine fisheries and aquaculture in and adjacent to EU Natura 2000 sites'. <b>Therefore, the development and implementation of conservation measures for marine Natura 2000 sites must become an organisational priority for NPWS.</b></p> <p><b>It is also worth noting that under current EU law, commercial fisheries and aquaculture in Ireland should already not be having a significant adverse effect on EU Natura 2000 sites or their qualifying marine habitats and species. Therefore, the timeframe for delivering this Target should be as soon as possible but no later than 2023.</b></p>		

<b>(xix) Suggested change to Objective 2</b>		
<b>Target 2F12</b>	<b>Action</b>	<b>Indicator</b>
By 2026, ensure that Ireland has mainstreamed the inclusion of Citizen Science in marine environmental policy implementation and actions contributing to the conservation of marine biodiversity	DHLGH will build, enhance and support biodiversity information and data gathering and archiving by Citizen Science initiatives conducted around Ireland's coastline and in inshore and offshore waters.  <b>This will build on existing public data collection efforts conducted by NGOs</b>	Publication of and progress against Biodiversity Citizen Science Strategy; National Biodiversity Indicators (NBI)- A.2.iii. Number of biological records submitted to national citizen science-driven monitoring schemes  <b>Central database housing this data to be publicly available</b>
<b>Rationale:</b> We would suggest that this action should build on existing data collection efforts by NGOs that involve the public and have already built an inventory of data e.g. BirdTrack App, CoastWatch's annual coastal surveys, etc.		

## OBJECTIVE 4: Embed Biodiversity at the Heart of Climate Action

(xx) Suggested change to Objective 4		
Target 4A2	Action	Indicator
By 2026, the evidence base of the current and future impacts of climate change on biodiversity has been strengthened	Relevant departments, agencies, and relevant academic institutions North and South will build on research to explore current and projected impacts of climate change on biodiversity. <b>This will require collaboration with NGOs who have already conducted relevant studies</b>	A more robust evidence-base of the current and future impacts of climate change on biodiversity <b>Assessment of actions taken to mitigate against impacts of climate change on biodiversity</b>
<p><b>Rationale:</b> Where there are studies available on the impacts of climate change on species and habitats, we should not be waiting on further evidence and should be acting upon that information to deliver on biodiversity action in the ever-pressurised environment with climate change as one of many stressors.</p> <p>Relevant departments, agencies, and academic institutions should reach out to and work with NGOs who are currently conducting and who have conducted studies in Ireland relevant to this target to understand the current evidence base within Ireland and where appropriate, act upon these findings and start taking urgent action. As the current target stands, there is a risk that the entirety of this NBAP's lifetime will be spent on gathering evidence which may already exist, and potentially losing critical time for acting on already urgent issues.</p>		

(xxi) Suggested change to Objective 4		
Target 4B2	Action	Indicator
<b>Avoiding, mitigating and minimising biodiversity loss and decline will be central to the development of the revised Offshore Renewable Energy Development Plan</b>	DECC will ensure that the governance framework established as part of the work on a revised Offshore Renewable Energy Development Plan (OREDPII)	<b>Number and quality of recommendations in the OREDP II which aim to halt and reverse biodiversity loss or promote marine conservation.</b>

<p><b>(OREDP II) process by 2023, which will include biodiversity representatives.</b></p>	<p><b>will include biodiversity at the forefront of all decision making and objectives of the plan, and as part of the updated cycle for the Plan.</b></p>	<p><b>A range of biodiversity representatives</b> sit on the Data and Scientific Group and the Steering Group for the OREDP II.</p>
<p><b>Rationale:</b> It is correct to recognise that biodiversity objectives must be fully integrated into all marine planning and decision making, especially as they concern offshore renewable development and the OREDP II plan currently being drafted. However, to ensure this happens, <b>it is imperative that the focus of the Action is changed to require the OREDP II to fully consider biodiversity at all levels, rather than simply mandate a biodiversity representative to join the advisory group.</b></p>		

<p><b>(xxii) Objective 4 Target 4C2</b></p>
<p><b>Rationale:</b> Fair Seas supports the Target and Action identified in 4C2. The importance of marine species, habitats and ecosystem restoration can't be overstated when considering biodiversity loss and decline in Ireland, and the role these species, habitats and ecosystem functions can play in climate action. However, the Target and Actions and outcomes here should be detailed within the SMART framework (i.e., Specific, Measurable, Achievable, Relevant, Timebound)</p>

## OBJECTIVE 5: Enhance the Evidence Base for Action on Biodiversity

### (xxiii) Suggested addition to Objective 5

Target 5B	Action	Indicator
<p><b>By the end of 2024, all environmental assessment and monitoring data associated with offshore renewables energy and other developments at sea, are publicly available and accessible.</b></p>	<p><b>The Government will make it a condition of the MAC and planning application process for developers to publicly publish all their environmental and monitoring data</b>, and create a centralised repository for such datasets.</p>	<p>Number of datasets available within the centralised repository.</p>
<p><b>Rationale:</b> To aid marine management and marine planning decision making, Objective 5 should include a new Target and Action making it a requirement of relevant stakeholders (e.g., developers) to make all environmental data collected during the MAC and planning application process required under the MAP Act (2021), to be publicly published and available for use by other state agencies and the general public.</p>		

**OBJECTIVE 6: Strengthen Ireland’s Contribution to International Biodiversity Initiatives**

<b>(xxiv) Suggested change to Objective 6</b>		
<b>Target 6A4</b>	<b>Action</b>	<b>Indicator</b>
By 2027, the AICBRN is advancing climate and biodiversity research with the support of government	The Government will work with NIEA and DAERA to support the work of the All-Island Climate and Biodiversity Research Network <b>to aid transboundary and all-Island nature conservation management</b>	€ in annual funding to AICBRN
<b>Rationale:</b> The AICBRN North-South platform must not only direct and support all Island scientific research but must also focus on delivering marine transboundary and all-Island nature conservation management recommendations.		

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