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RE: Consultation on the 4th National Biodiversity Action Plan

To whom it may concern,

Ulster Wildlife is Northern Ireland's largest local nature conservation charity with over 14,000 members. Our vision is a wilder future where people and nature are thriving together. Our purpose is to protect and restore nature on land and at sea, and we will play our part in ending the climate and ecological emergencies, creating a society where nature is valued and is part of our daily lives. We welcome the opportunity to comment on the Department of Housing, Local Government and Heritage's consultation for Ireland's Fourth National Biodiversity Action Plan (4th NBAP).

Cross-border/transboundary considerations:

We applaud the principles behind the Action Plan and the firm recognition of the transformative change required to protect and restore Irish nature, both on land, in freshwater, and in our seas.

Northern Ireland is currently developing its next Biodiversity Strategy (due to be completed in 2023), and we believe that opportunities must be seized to align the NBAP and the incoming NI Biodiversity Strategy in recognition that the island of Ireland is a single biogeographic unit, and a single unit for plant and animal health. Many of our best protected sites for nature (e.g. Special Areas of Conservation and Special Protection Areas) straddle the border, and many of our endangered species use habitat across both sides of the border, requiring policy alignment and active cooperation between both sides of the island.

There have been efforts driven and coordinated via European funding that have fostered effective cross-border collaboration on practical conservation, site management and species monitoring (such as the INTERREG VA programme – for example CANN, CABB, MarPAMM, Compass, Sea Monitor projects), often specifically targeting mobile and/or migratory species that utilise the wider island of Ireland and its surrounding waters. Similar programmes are being developed under Peace Plus, but there is some concern that without such programmes longer term cross-border or All-Island monitoring and collaborative management of habitats and species will be at risk. Maintaining the levels of expertise and momentum between such funding programmes is also a risk for sustained action to improve biodiversity. The Shared Island funding stream may address some of this, but it is essential that tangible and compatible targets are set within policy in both the Republic of Ireland and Northern Ireland to provide the framework for such work, and long-term resourcing (including encouraging private /novel investment routes) is adequately considered and prioritised.

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We welcome collaborative networks of academics that promote and coordinate all-island research, such as the new All-Island Climate and Biodiversity Research Network, and hope that the planned investment in this will ensure its effectiveness, as we recognise that the different funding mechanisms/drivers between Northern Ireland and ROI universities/research institutes which can make effective and long-term collaboration challenging. To be truly effective it is essential that such research networks foster partnerships with organisations working 'on the ground' and encourage wider citizen-led initiatives, as well as providing evidence for policy-making and policy evaluation.

Island-wide data collection is vital for monitoring the effectiveness of policy and action plans both sides of the border, as well as helping identify potential risks (such as disease, invasive species, pollution impacts etc.) that need a cross-border approach to address. There are many examples of such Island-wide surveys, such as the All-Ireland Squirrel Survey 2019 and the current Irish Hedgehog Survey. Furthermore, best practice and experience sharing should be facilitated between organisations across the island of Ireland (for example, the Northern Ireland Barn Owl Working Group brings together expertise from BirdWatch Ireland with Ulster Wildlife, RSPB, British Trust for Ornithology and the Barn Owl Trust), and study visits between organisations encouraged.

The All-Island Pollinator Plan is an excellent example of an adopted cross-border approach that is subscribed to by public bodies, NGOs and many other organisations both sides of the border. Similar initiatives must be encouraged and resourced to deliver effective action across the biogeographical unit of the island of Ireland.

Proposal: A North-South Biodiversity Forum:

Ulster Wildlife suggests that establishing a North-South Biodiversity Forum could provide a platform for transboundary communication, knowledge sharing and the development of complementary management efforts for species and habitats. From a marine perspective, which can be a more challenging policy area, there are several parts of the 4th NBAP that could be supported through the formation of such a forum, ensuring higher levels of species and habitat protection and recovery:

- **Development of the ROI MPA network**

Under objective 2, outcome 2F, it is promising to see DHLGH will enact and implement comprehensive legislation enabling the designation and management of Marine Protected Areas (MPAs). A North-South biodiversity forum would ensure government officials, eNGOS, sea users and other stakeholders are contributing to this process to capture transboundary considerations to MPA network development in the ROI.

The experiences of developing the Northern Ireland MPA network can be applied to ensure greater success of the ROI MPA network. For example, The NI MPA network currently covers 38% in NI inshore region¹. However, according to a DAERA assessment, only 4% of the MPA network is actively managed. Actionable management plans will therefore be required for each MPA, and these should be implemented immediately to enable the MPA conservation objectives to be met. A successful MPA network that meets the objectives of species and habitat protection and recovery will also require adequate resources for long-term monitoring and enforcement.

North-South collaboration will also help identify features that require designations to improve the ecological coherence of both NI and ROI MPA networks, acting further to meet the objectives of the OSPAR Convention for the Protection of the Marine Environment of the North-East Atlantic, and marine biodiversity throughout the region.

¹ <https://www.daera-ni.gov.uk/articles/marine-protected-areas>

- **Identify partnerships for Blue Carbon habitat restoration programmes**

We welcome to inclusion of promoting marine nature-based solutions, including restoration and restoring 'blue carbon' ecosystems, as outlined in objective 4, outcome 4c. In NI, DAERA are currently co-designing a Blue Carbon Action Plan, in tandem with updating the NI MPA Strategy.

As blue carbon protection and restoration is a priority in both ROI and NI, this is a key area of engagement that could be developed further within a North-South biodiversity forum. Priorities will include identifying wider research gaps, exploring the options for developing partnerships and securing funding for blue carbon restoration programmes in the North and South.

- **Improving island wide data collection through citizen science programmes**

Citizen science is a key method in supporting data collection to monitor biodiversity, and currently some projects within Northern Ireland and ROI are gathering data on the same species. Elasmobranch conservation projects such as Ulster Wildlife's Sea Deep project² encourage members of the general public to submit shark egg case records. In ROI similar projects like the Ray Project³, are also receiving egg case data. It is important to ensure the methodologies for gathering records are the same by both projects, so data can be combined and analysed together. Through north-south engagement, tools can be developed to create citizen science programmes, which ensure the standardisation of data and aligns methodologies throughout the ROI and NI. These programmes will also assist data sharing North and South, guaranteeing crucial data on species presence and distribution that would otherwise not be being received and utilized by relevant conservation projects, is available throughout the island of Ireland.

Overarching comments:

Within the actions and outcomes of the NBAP, Ulster Wildlife respectfully suggests increasing consideration of how to embed the 30 by 30 outcome throughout, recognising this as a crucial and urgent action towards climate resilience as well as nature's recovery. Further consideration should be made of Other Effective Conservation Measures (OECMs), how to define these and how these could be linked to strongly protected areas for nature to form ecologically functioning, climate-smart networks on both land and sea. This requires a national framework which can then be implemented through local biodiversity action plans and wider initiatives, and linked to frameworks in development in Northern Ireland. Within our seas, this can be facilitated by effective marine spatial planning as well as new Marine Protected Areas. Further opportunities for restoration and creating space for nature could be detailed, such as Greenways, and how biodiversity net gain principles can be embedded into planning both on land and at sea.

Finally, it is mentioned that the 4th NBAP has taken learnings from the 3rd NBAP regarding the need for SMART targets. While it is clear that many actions in this draft NBAP are SMART, there are still some that lack specificity and may be challenging to monitor progress against, or be accountable to. We understand that this is still a work in progress and look forward to seeing these further developed.

From a marine conservation perspective, and as a member of the Northern Ireland Marine Task Force, Ulster Wildlife supports the recommendations outlined in the Fair Seas response to this consultation including the following statements:

² <https://www.seadeepni.org/>

³ <https://www.therayproject.org/>

- **Suggested addition to objective 1:** By 2026, measures for sustainability and biodiversity implemented under the Common Fisheries Policy are delivering positive outcomes for biodiversity.
- **Suggested addition to objective 1:** DHLGH will publish detailed site-specific management plans for all SACs and SPAs.
- **Suggested addition to objective 1:** DHLGH and other relevant organizations will support projects focused on restoring marine habitats and species including native oysters, seagrass and saltmarsh.
- **Suggested addition to objective 2:** *Number and spatial coverage of designated MPAs within Ireland's maritime area reaching 30% by 2030 and achieving 'fully' protected status for 10% of Irish waters.*
- **Suggested addition to objective 4:** Avoiding, mitigating and minimizing biodiversity loss and decline will be central to the development of the revised Offshore Renewable Energy Development Plan (OREDPII) process by 2023, which will include biodiversity representatives.

Once again, we commend the commitment and progress made in development of the 4th NBAP, and hope that our comments are useful. Should you wish to discuss any of these in more detail please don't hesitate to contact me via annika.clements@ulsterwildlife.org or info@ulsterwildlife.org
 Yours faithfully,



Dr Annika Clements FRGS
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