

Simon Musial

From: Oonagh Duggan <[REDACTED]>
Sent: 23 January 2019 14:36
To: RSES
Subject: BirdWatch Ireland submission
Attachments: BirdWatch Ireland submission to JOCCA.pdf; BirdWatch Ireland submission to EMRA RSES.pdf

Hello:
Please find attached the BirdWatch Ireland submission to the RSES of the EMRA.
Thank you
Regards
Oonagh Duggan

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Submission to the Joint Oireachtas Committee on Climate Action from BirdWatch Ireland

BirdWatch Ireland respectfully requests that the Joint Oireachtas Committee considers the recommendations in this submission in their forthcoming report on Climate Action. Action to significantly reduce greenhouse gas emissions in Ireland is urgently required in order to stem the worst impacts of climate change. Climate change is anticipated to affect all levels of biodiversity, from organism to biome levels (Bellard et al 2013¹, Pereira et al 2010²) including our birds. Birds are indicators of the health of the environment but in Ireland the number of birds of serious conservation concern is at its highest ever³. One third of Ireland's wild bee species are threatened with extinction⁴. 91% of Ireland's internationally important habitats have bad or inadequate ecological status⁵. Habitat loss and degradation caused by human activities are the main causes of impacts. **Climate actions which also protect and restore habitats will provide valuable co-benefits for our threatened wildlife.** Nature-based solutions will help create landscape resilience in the face of climate change. We make the following recommendations:

1. **Climate actions must be proofed** to ensure that they are consistent with both Ireland's targets under the UN Convention on Biological Diversity and those of the United Nations Framework Convention on Climate Change. Climate mitigation and biodiversity protection and restoration are complementary, but that this is not inevitably the case and proofing is needed to ensure that both goals are pursued.
2. **Conserve and restore peat habitats and soils:** Citizen's Assembly Recommendation 7 relates to the cessation of peat cutting and government subsidies to be directed towards peat bog restoration including rewetting of bogs. We fully support this proposal as it would have significant benefits for birds of our upland blanket bogs and lowland raised bogs including the globally threatened Curlew. Agriculture and afforestation policy and poor implementation of the laws protecting biodiversity on upland and lowland farms can also result in negative impacts to peat habitats and peat soils. We recommend that the Department of Agriculture supports financially rewarding agri-environment schemes in the forthcoming Common Agriculture Policy Strategic Plan and agriculture payment conditionality rules that support protection of peat habitats and soils in a farmed environment. The latter ties in with **Recommendation 11** where the Citizen's assembly called for rewards for the farmer for land management that sequesters carbon. Critically, restoring the proper functioning of peatland habitats would assist in slowing runoff which could help with flood protection in lowland areas.
3. **Sequester and store carbon through hedgerows:** It is estimated that 450 kHa or 6.4% of the Irish landscape is comprised of hedgerow, scrub and non-forest trees⁶. Hedgerows and their associated trees, banks, ditches and margins provide a precious multi-functional resource in our countryside, benefiting *inter alia* plants and wildlife, agriculture, water quality, flood mitigation, tourism and the general community through their landscape value. They provide essential food, shelter and corridors for wildlife. They also have potential to help mitigate climate change by sequestering carbon in woody biomass and in soil. EPA research suggests that hedgerows and non-forest woodlands could potentially sequester 0.66–3.3t CO₂/ha/year⁷. Data from 17 County Hedgerow Surveys indicate that **only one third of hedgerows are in a favourable conservation state** leaving potential for greater carbon sequestration & storage potential through an improved quality stock while supporting wildlife. **We recommend the completion of the National Hedgerow Survey and convening of a National Stakeholder Forum to develop a National Hedgerow Conservation Strategy to maximise the carbon and biodiversity co-benefits of Ireland's unique hedgerows.**

¹ Bellard, C. et al., 2012. Impacts of climate change on the future of biodiversity. Ecology letters, pp.365–377

² Pereira, H.M., Leadley, P.W., Proenca, V., Alkemade, R., Scharlemann, J.P.W., Fernandez-Manjarres, J.F. et al. (2010). Scenarios for global biodiversity in the 21st century. Science, 330, 1496–1501

³ Colhoun K. & Cummins, S. 2013 Birds of Conservation Concern in Ireland 2014–19. Irish Birds 9:523–544 & available here <http://www.birdwatchireland.ie/LinkClick.aspx?fileticket=WpxRLyuI9cA%3d&tabid=178>

⁴ All-Ireland Pollinator Plan 2015–2020. National Biodiversity Data Centre Series No. 3, Waterford

⁵ DAHG 2014. Ireland's Fifth National Report to the Convention on Biological Diversity. Department of Arts, Heritage and the Gaeltacht.

⁶ Green, S., The Irish Hedge Map Teagasc 2010. Department of Agriculture Food and the Marine https://www.teagasc.ie/media/website/publications/2010/The-Irish-hedge-map-version1_5690.pdf

⁷ Black et al(2014) Carbon Sequestration by Hedgerows in the Irish Landscape, EPA, Wexford available here <http://www.epa.ie/pubs/reports/research/climate/ccrp-32-for-webFINAL.pdf>

- 4. Improve the Biodiversity Co-benefits of Afforestation.** In relation to the **Citizen’s Assembly recommendation 13** recommending supports for afforestation. Forestry can provide biodiversity co-benefits if the right trees are planted in the right place under the right management. Currently, afforestation is a significant pressure and threat to biodiversity⁸ especially when it occurs on land that was biodiversity-rich prior to planting⁹. Currently, there is no ecological assessment of afforestation applications outside of EU designated sites. Biodiversity-rich areas are being lost to an unsustainable forestry model. This must be rectified to protect ground nesting birds, pollinators and species rich grasslands. We recommend that **ecological assessment is undertaken of all afforestation applications.**
- 5. Explore the synergies between climate change mitigation potential of blue carbon while protecting habitats.** Marine ecosystems provide an important role in climate regulation. The possibilities and potential of the ‘blue carbon’ of our marine and coastal habitats in Ireland should also be explored with the view to maximising carbon sequestration and storage benefits but critically ensuring the protection of coastal ecosystems for the benefit of biodiversity. The EPA has undertaken research on the role salt marshes, sand dunes, bays and estuaries play in relation to carbon mitigation¹⁰. Programmes such as the Blue Carbon Initiative and similar¹¹ provide additional information. Critically, many of Ireland’s Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) for birds are designated due to these important habitats but they have ‘bad’ conservation status due to habitat degradation and pollution. Protection and restoration could have multiple benefits. Terrestrial coastal habitats also have a very important role in climate change adaptation buffering the hinterland from storm and flood events.
- 6. Ensure coherence across government policies and strengthen enforcement of environmental laws to achieve climate goals with biodiversity co-benefits.** Sectoral policies, plans, programmes, schemes and laws relating to, but not limited to, agriculture, forestry, flood protection, renewable energy, the marine, tourism, and biodiversity all need to be heading in the same direction to meet climate goals and to protect habitats which support them. There could also be significant wins in terms of reaching our climate goals if our existing suite of environmental laws and regulations governing habitats were implemented and enforced effectively. Indiscriminate hedgecutting and hedgerow removal in the countryside is the number 1 complaint to BirdWatch Ireland from members of the public despite laws in place to prevent this occurrence. The thresholds to trigger Environmental Impact Assessment for forestry and activities on farmland are too high and resulting in significant loss of habitat. Failure to regulate burning in the uplands results in significant impacts to peat-based habitats every year. Over 21,400ha of Natura land (SACs and SPAs) have been burnt between 2011-2016¹² releasing carbon into the atmosphere, degrading habitats, impacting on the species supported by these habitats like Hen Harrier and Curlew who breed in the uplands and stymying our goals to achieve favourable conservation status of these habitats as per the Habitats Directive. The cost to the exchequer to deploy the fire service to attend out-of-control fires in upland mountains and lowland hills between 2010-2015 in 10 counties was €6.1million¹³. Finally, awareness needs to be raised with the general public, farmers and competent authorities of the value of habitats for both biodiversity and climate benefits.

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⁸ DAHG 2014. Ireland’s Fifth National Report to the Convention on Biological Diversity. Department of Arts, Heritage and the Gaeltacht.

⁹ Graham, Conor.T.; Wilson, Mark W., Gittings, T., Kelly, Thomas C., Irwin, Sandra; Quinn, John; O’Halloran, John., (2015) Implications of afforestation for bird communities: the importance of preceding land-use type *Biodiversity Conservation*, DOI 10.1007/s10531-015-0987-4.

¹⁰ Norton et al (2018) Valuing Ireland’s Coastal, Marine and Estuarine Ecosystem Services, EPA, Wexford, available here http://www.epa.ie/pubs/reports/research/water/Research_Report_239.pdf

¹¹ <http://thebluecarboninitiative.org/>

¹² Data from Irish Government reports to European Forest Fire Information System, Forest Fires in Europe, Middle East and North Africa 2016. EUR 28707 EN, Publications Office, Luxembourg

¹³ BirdWatch Ireland research undertaken through Freedom of Information requests to local authorities.



BirdWatch Ireland Submission to East Midlands Regional Authority Regional Economic and Spatial Strategy

BirdWatch Ireland would like to raise the following points in relation to the Regional Economic and Spatial Strategy (RSES) for the EMRA.

The place of biodiversity within the EMRA vision and RSES

The EMRA vision is : “To create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, and ensures access to affordable housing, travel and employment opportunities for all”. Our natural heritage or natural capital or biodiversity as it is also called underpins the vision set out by the EMRA. The reality for the status of biodiversity in Ireland however is one where considerable focus, investment, appropriate planning and policy coherence is required and the EMRA has an important role in this area.

Birds are indicators of the health of the environment and in Ireland the number of birds of serious conservation concern is at its highest ever¹. One third of Ireland’s wild bee species are threatened with extinction². 91% of Ireland’s internationally important (i.e. EU protected) habitats have bad or inadequate ecological status³. Habitat loss and degradation caused by human activities are the main causes of impacts.

While the focus in the RSES is on economic growth and spatial planning, it also provides clear acknowledgement of the importance of the environment and biodiversity within the region. This is evident in the chapters focusing entirely on the environment and biodiversity and the fact that a clean environment, functioning biodiversity including habitats and wildlife underpins many of the actions presented.

- The RSES lists the underpinning principle for Climate Action ‘The need to enhance our natural capital and climate resilience and to accelerate a transition to a low carbon economy’.
- The Environmental Report for the RSES states: *‘Key issues which have been highlighted through the assessment are the need for specific actions to mainstream biodiversity into the RSES and fully harness the ecosystem services approach to planning. Without the value of biodiversity being understood in terms of flood management, water quality, air quality, carbon sinks, health and wellbeing to name some and specific tools being developed at the regional level it will be more difficult to see achieve meaningful integration at lower planning tiers’.*
- There are several references and goals to seizing and exploiting the tourism benefits of natural areas including the development of greenways, blueways etc..

However, there are no objectives which focus on the financial investment or goals for the protection and restoration of habitats which form the basis of the natural capital which underpins the economic goals of the RSES. This is an omission. With 91% of EU protect habitats having bad or inadequate conservation status and these habitats supporting a variety of ecosystem services, it is clear that these natural assets will further deteriorate without policy coherence which supports them and financial investment to restore them and incentivise positive actions for them. We ask that an additional recommendation on financial investment in biodiversity is included.

¹ Colhoun K. & Cummins, S. 2013 Birds of Conservation Concern in Ireland 2014-19. Irish Birds 9:523-544 & available here <http://www.birdwatchireland.ie/LinkClick.aspx?fileticket=WpxRLyuI9cA%3d&tabid=178>

² All-Ireland Pollinator Plan 2015-2020. National Biodiversity Data Centre Series No. 3, Waterford

³ DAHG 2014. Ireland’s Fifth National Report to the Convention on Biological Diversity. Department of Arts, Heritage and the Gaeltacht.



Indicators in the associated Environment Report

The SEA Monitoring Programme described in the Environment report lists *No net contribution to biodiversity losses or deterioration* as an objective for Biodiversity, Flora and Fauna and it lists the condition of European sites as an indicator for this objective. However, **no baseline of the condition or conservation status for each of the Natura sites in the EMRA has been provided so that actions can be measured against the baseline.** There is incongruity with the assessment in the Natura Impact Statement of EU protected habitats and species and then for the indicators for objectives in the Environment Report to be the condition of the sites. The condition of the individual sites was not presented in any report. **This information must be provided (in addition to the condition of protected habitats and species) and the assessments redone to take the baseline into account.**

Light-bellied Brent geese

Light-bellied Brent geese migrate to Ireland to overwinter from high Arctic Canada. They are much cherished in the Greater Dublin area where people monitor their annual comings and goings. They are also protected migratory species as well as being qualifying interests for several East Coast SPAs. The ex-situ foraging habitats used by Brent geese (and other species) are coming under sustained pressure from housing development requirements in the Greater Dublin area. Typically the geese will feed on short swards of playing pitches and parks when eel grass (*Zostera Spp*) they normally feed on runs out over the winter. Conservation of ex-situ habitats is listed as a Conservation Objective of several SPAs in the Greater Dublin area but practical management and support for these sites is not underpinned effectively in the development plans for Dublin, Fingal, South Dublin and Dún Laoghaire. The importance of ex-situ habitats of Brent is listed in the Natura Impact Statement relevant to the MetroLink but there is no other mention though issues have already been raised in relation to housing development in Dublin where ex-situ Brent habitat is threatened. A conservation plan is required to support this species and the ex-situ sites with relevant objectives included in County development plans. It is important to note that the areas that the geese use are also important areas for people and recreation. The RSES and associated documentation needs to address this issue and support the conservation of the species.

Greenways and blueways

Getting people out on bicycles and walking are essential not only for human health but also to reduce our reliance on motorised transport and fossil fuels. They are also important for tourism. However, in our experience with review of greenway planning applications, the pre-planning choice of routes has superceded the importance of, and obligation, to protect habitats and species. We cannot underline enough that some places will be just too sensitive for greenways and blueways. Some places must be considered out of bounds in order to avoid disturbance to birds and habitats, and costly court cases. We request that the wording around the development of these routes be qualified to reflect the utmost care that is required when considering routes.

Other Recommendations:

1. In relation to RPO 7.15, we make the following suggested additions: *Local Authorities shall ~~take~~ prioritise opportunities to enhance and protect biodiversity and amenities and to ensure the protection of environmentally sensitive sites, ~~and~~ habitats and species, including where flood risk management measures are planned. County biodiversity action plans should be developed and resourced.*

A sentence has been included above relating to biodiversity action plans. An overarching objective for the conservation of habitats and wildlife as part of the plan is imperative and missing currently.



Resourced county biodiversity action plans can also play a significant role in protecting habitats and supporting ecosystem services.

In addition, considering the focus on ecosystem services in the draft RSES RPO 7.15 fails to adequately integrate this focus. In relation to flood risk management measures, nature-based solutions to flood risk offer biodiversity co-benefits and this approach must be taken included.

2. RPO 11.1: In co-operation with relevant departments in Northern Ireland, the Eastern and Midland Regional Assembly will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning and related spheres.

In relation to RPO 11.1, birds, other wildlife and water do not know what borders are. The potential impact of Brexit on the Environment of the island of Ireland is very serious⁴. But even if Brexit never happened, cross border cooperation and focus on protection of habitats and wildlife is critical. We suggest inclusion of the word 'environment' in its broadest terms to this recommendation.

Renewable Energy and Bird Wind Sensitivity Mapping Tools

BirdWatch Ireland has developed bird wind sensitivity mapping tool for terrestrial wind farm developments. More information can be found here including free GIS layers⁵. We recommend that all the local authorities take account of the sensitivity mapping tool as a pre-planning tool in the toolbox to help site wind energy infrastructure that minimises impacts to birds. BirdWatch Ireland supports the development of renewable energy infrastructure and developed this tool in order to help Ireland decarbonise its economy while minimising the impacts to birds.

We have also developed a trial bird wind sensitivity map for marine renewable energy in the Irish Sea as a precursor to developing a full marine renewables sensitivity map for Ireland subject to funding with the same goal to provide a constructive pre-planning tool in the tool box to minimise the impacts to seabirds.

Please note the enclosed Attachment:

BirdWatch Ireland also encloses an attachment which is a recent submission to the Joint Oireachtas Committee on Climate Action which outlines climate action which can be taken which would have biodiversity co-benefits. We would hope that this information could also help inform the RSES.

Point of Contact:

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⁴Northern Ireland Environment Link & the Environmental Pillar (2017) Brexit and Shared Environmental Issues between Northern Ireland and the Republic of Ireland with specific regard to cross-border issues
<http://environmentalpillar.ie/wp/wp-content/uploads/2017/06/EP-NIEL-Submission-to-Dail-GFA-Committee-1-June-2017-Final.pdf>

⁵ Mc Guinness, S., Muldoon, C., Tierney, N., Cummins, S., Murray, A., Egan, S. & Crowe, O. (2015). Bird Sensitivity Mapping for Wind Energy Developments and Associated Infrastructure in the Republic of Ireland. BirdWatch Ireland, Kilcoole, Wicklow.
<https://www.birdwatchireland.ie/OurWork/PolicyAdvocacy/BirdSensitivityMapping/tabid/1312/Default.aspx>

