



**Chambers
Ireland**
Advancing business together



Chambers Ireland Submission to the Department of Housing, Local Government and Heritage on the 4th National Biodiversity Action Plan

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Chambers Ireland's Perspective:

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 40 members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Our Network has pledged since 2019 to advocate for and support the advancement of the Sustainable Development Goals. In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), advancements in gender equality (SDG 5), viable industries, innovation, and infrastructure (SDG 9) and progress in climate action (SDG 13).¹

Even if we only consider biodiversity from the narrow perspective of the economy, sustaining the little biodiversity that exists on the island is in all of our interests. Our water supplies are dependent on improving the health of our land, the more our water quality disimproves the more costly it will be to supply potable water and the more difficult it will be to mitigate the impact of droughts. Narrowing our land use means that our land has become less effective at retaining water, this amplifies both the impact of droughts as waters that would have been retained in soils and the effects of flooding as rain runoff reaches rivers faster. With significant increased investment in capital infrastructure across several decades, the cost of flooding events has greatly increased – all our cities and major towns are built on rivers – as the frequency of extreme weather events rises this will increase the number of flooding incidents we experience, thereby multiplying the costs. Local flood defence solutions are frequently too reliant on over-engineered solutions that degrade the built heritage of our towns, debasing their

¹ The Chambers Ireland SDGs. Available at: <https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/>

tourism economy value, while simply speed floodwaters further downstream where they cause even greater damage. More than half of our rivers are polluted with agricultural run-off which threatens the viability of water-tourism offerings. Poor land management downgrades the quality of our waters through run off and erosion. Overreliance on a reduced set of food crops undermines our agriculture and our food supply as the hollowing out of our biodiversity leaves creates niches for invasive species that can target agricultural plants and animals. Just as large tracts of Britain burnt in 2022, it is likely that Ireland will experience wildfires with greater frequency in years to come. Resinous monocrop pine plantations on dry peat soils are likely to be especially vulnerable to fires and are will therefore be significant emitters of green-house gases as the accumulations of carbon as the thick fuel soils burn. Furthermore, given how they have been coupled with large electricity generation and transmission capacity, fires in Sitka spruce plantations are a threat to the stability of our power networks.

But biodiversity cannot simply be looked at from an economic perspective, biodiversity is not a target, it is an outcome; it is a consequence. Making our territories – at sea or by land – hostile to life is in none of our interests. Losing dragonflies is not just a ‘magic of childhood’ moment that future generations will lose, it is a signal that native insect life cannot thrive. This cascades through the food web leading other populations to collapse. Ireland shouldn’t need a lesson on concentrating our agriculture into a small number of valuable species makes our country poorer and vulnerable. Just as children today won’t have the memories of the richness that the land held forty years ago, we don’t have a recollection of the seas when they were bountiful and teeming with life. Each year we empty our lands and our waters of still more life, and with it each year we make our island less habitable for people. Even in our cities and towns this can be seen, we increasingly constrain or concrete-over the rare instances of plant and animal life that have survived, even though the trees that are planted today will be what is protecting people from the heat of 2040, the most efficient means of cooling our streets are trees and yet they are treated as costs not assets.

Questions

Do you think the Vision and Objectives capture the major themes/challenges that you see for biodiversity? In other words, if Ireland achieves these Objectives by 2027, would we have made significant progress towards addressing the biodiversity crisis?

Unfortunately, if the “whole of society” approach is what is needed to tackle the causes of our biodiversity collapse, we are starting from a very low base. There is little evidence to suggest that a “whole of government” approach exists as it seems as though a wide range of departments do not consider it as an issue of substantial importance. Should we achieve progress towards a whole of government approach that actually begins to mitigate the loss of biodiversity it will be significant progress.

There is little within the Objective 1 to section that suggests that we will have begun to affect the biodiversity crisis by 2027. There is an acceptance that action needs to be taken, but in effect that action will be delayed for at least another five years.

Regarding the meeting of “Urgent Conservation and Restoration Needs” there are many areas where the Department of Housing Local Government and Heritage, should it accomplish its objectives, will have made significant steps towards reducing biodiversity loss. The department is required to carry out a significant action plan if it is to meet the agenda of Objective 2. Should other departments not be wholly committed to the biodiversity plan it is likely that they will inevitably undermine the efforts of the department which is a fundamental weakness to this plan – it remains to be seen if other government bodies will have the dedication to deliver on this department’s action plan.

Objective 3's agenda is to be broadly welcomed, though how effective it will be in mitigating biodiversity loss is an open question. This section seems to be much more about promoting the concept of biodiversity than delivering tangible results. In keeping with this, the embedding biodiversity at the heart of climate action is useful but is not much more than a continuation of the "whole of government" approach in Objective 1. Similarly, enhancing the evidence base for action on biodiversity is also to be welcomed, but as the aim is to measure rather than act it is unlikely to have an effect on biodiversity loss by 2025.

Strengthening Ireland's contribution to international biodiversity initiatives is too a good thing but is at so far of a remove from action that it is unlikely to have an impact in the timeframe considered this question.

The Department of Housing, Local Government and Heritage's position on biodiversity is clear and welcome. But almost all of the objectives that are likely to have any kind of impact on the loss of biodiversity in the short run are being carried about by the department of bodies that are part of the department. Chambers Ireland has serious concerns about the seriousness with which other departments treat the issue of biodiversity loss. Where other departments are involved there is not a commitment to take action, but a commitment to consider, to plan, to incentivise action, but not a commitment to deliver action on biodiversity loss. It feels a lot like the issue of decarbonisation, where certain sectors are strategically delaying and deferring action.

Do you have any comments on the Outcomes included under each Objective in the Draft NBAP? Do you feel that these Outcomes adequately address the Objectives under which they are situated? Do any additional outcomes need to be added to meet the objective?

It will be interesting to see “organisational capacity and resources for biodiversity” increase across government; clear metrics will be useful when it comes to measuring our rate of biodiversity decline, however the path towards renewing our broader environment is likely to take decades to halt. Assessing our biodiversity decline will not be when progress towards “addressing the biodiversity crisis” occurs – progress will not be occurring until we can see these metrics improving.

In the absence of government introducing a statutory requirement for National Biodiversity Action Plans it is likely that many departments, organisations, and agencies will merely charge their newly appointed biodiversity officers with reporting on the rate of biodiversity decline rather than resourcing and empowering them to ensure that these bodies are not worsening the rate of biodiversity loss. It is hard to see how interests within government bodies will initiate the kinds of systemic change they need to accomplish if they are to address their role in biodiversity loss unless it is mandatory. The vision for Objective 1 is for the rest of government to merely consider whether they will make biodiversity action plans a legal necessity, this is very far from “addressing the biodiversity crisis”.

There will be significant tension between the Department of Agriculture, Food, and the Marine and any form of biodiversity plan. The strategy of the department seems to be to use increased mono-cropped non-native tree plantations to mitigate against the increased emissions output of the sector under the premise that this timber locks in embodied carbon, however of the 3.2m m³ of roundwood produced in 2018, only 1.01m m³ was converted into sawn wood. About 40% of

the wood biomass in Ireland is burnt and the vast majority of our forestry exports flow into wood-based panels, paper, and particle board which are not likely to act as long-term carbon sinks.

Even if the “the root causes and key drivers of biodiversity loss are tackled by each responsible department” objective is achieved it will not have done anything to mitigate biodiversity loss by 2027, it will merely have made an attempt to amend the incentives which farmers, and in particular the smaller farmers, operate under.

It seems as though the department believes that changing the behaviour of tens of thousands of small farmers will be a relatively trivial task, despite the slow pace of action to date. We will be pleasantly surprised if, in the review of the incentives which the Department of Farming, Agriculture and the Marine are to introduce, those incentives prove to be effective.

Business for Biodiversity needs to make rapid progress in delivering a “Payment for Ecosystem Services” scheme and should grant aid businesses that want to get biodiversity audits conducted so that these businesses can be helped to create effective biodiversity plans (in the way that SEAI offers grants to assist businesses in conducting energy audits). Though we welcome the proposed addition of biodiversity to the Climate Toolkit 4 Business, we argue that the businesses that are having the greatest impact on biodiversity are also likely to have a difficult transition to ameliorating that impact, and therefore should be supported in creating plans to reduce that effect.

Clearly the aim of ensuring that the “legislative framework for biodiversity conservation is robust, clear and enforceable” is useful, but as with many of the other vision elements within the biodiversity plan, it is merely setting the stage for later action to reduce biodiversity loss.

We strongly welcome the direction to the OPW to seek more ecologically sensitive flood mitigation efforts. We support the updating of Bord na Mona's Biodiversity Action Plan though it would be useful if there was clarity regarding whether they should be aiming for re-wetting peatlands or using their land for forestry. And the Departments planned resourcing of efforts to control invasive alien species are to be welcomed.

Significant efforts will be required of the Department of Farming, Agriculture and the Marine, and Teagasc, however it remains uncertain whether the poor delivery of effective policy to preserve biodiversity by those bodies is to change.

Chambers Ireland strongly supports the aims of Irish Water's Water Services Strategic Plan and its Biodiversity Action Plan which if accomplished by 2027 will have a great effect on biodiversity loss.

It is hard to see how biobanking is to have an effect on long term biodiversity on the island other than in areas of seed, there is a risk that this 'objective' will merely become a public-relations talking point which bodies will respond with when they are criticised for not doing enough on biodiversity.

Are there any Actions in the Plan that you feel require amendment? Or indeed, are there additional actions needed? If additional actions are needed, who should implement these actions?

Specific direction should be given to Bord na Móna regarding how they ought to treat their peatlands, the Business for Biodiversity programme should be much more ambitious in its agenda and should be resourced sufficiently such that it can support the biodiversity auditing of businesses, the creation of biodiversity plans, and the training and upskilling of employees to support such plans.

There is also an opportunity relating to the certification of carbon offset land use, and sustainable forestry certification. With the increase in ESG requirements many Irish subsidiaries are obliged by their parent firms to offset their current carbon outputs. While it is in the interest of all of our members to do so, there are limitations on how quickly businesses can adapt, for example until the energy networks are wholly decarbonised, all electricity that is used will have a carbon output associated with it, Combined Heat and Power units are not likely to be able to transition to Green Hydrogen until there is an adequate supply chain to service them, and that is not likely to occur until a significant investment in offshore wind turbines has commenced. Therefore, there are a pool of businesses that are seeking carbon offsetting services from sustainable forestry which can mitigate some of the impact of their businesses. This is an opportunity for wider society to ensure that adequate investment in forestry as a service that protects our water sources, supports biodiversity, and mitigates some of the impact of the damage which our carbon outputs are doing to our environment.

It is also notable that the biodiversity plan has a number of images of barren hillsides and overgrazed lands, and no mention of the damage that feral and farmed ruminants do to our peatlands and forests. While there is an acceptance that the National Parks and Wildlife Service will attempt to remove invasive alien species from the parks it is unclear as to whether this will extend to non-native

deer. The issue of sheep and goats overgrazing commonage, upland bogs and destroying hillside environments goes unmentioned.

Biodiversity is not the responsibility of any single body or sector but requires engagement and partnerships across government and communities. As such, the NBAP seeks to promote a 'Whole of Government, Whole of society' approach to biodiversity in Ireland. In your view, what can be done to further promote public and community engagement around biodiversity under the NBAP?

Government needs to lead before the public can know where to follow. For as long as separate arms of the state are acting against each other public engagement will be a poor substitute for taking real and effective action.

Are you (or your organisation) involved in any initiatives or work which could be relevant to the 4th NBAP (in terms of informing new actions, providing useful case studies, etc)? If so, please detail below.

Chambers Ireland has two initiatives in this area, the Climate Ready Initiative, and the Sustainable Development Goals (SDG) toolkit for businesses.

Climate Ready – Climate Ready is a five-year, national initiative developed to equip Irish businesses with the skills they need to respond to climate change. This is developed by Skillnet Ireland to support the government's Climate Action Plan and Climate Action and Low Carbon Development Bill.

This initiative supports businesses by helping them develop practical skills that will allow them to maximise the opportunities presented by the transition to a low-carbon economy. The core elements of this initiative are

1. Climate Ready Academy

A series of learning supports for businesses in the field of climate action and sustainability.

2. Climate Ready Cluster

A group of Skillnet Business Networks providing expertise for Irish Businesses in renewable energy, green technology; environment, water and energy management; and sustainable finance.

3. Climate Ready Insights

A centralised platform dedicated to helping businesses advance their thinking around sustainable practices.

More information on climate ready is available [here](#).

Sustainable Development Goals (SDG) Toolkit – Chambers Ireland's SDG Toolkit is a guide to help businesses implement the United Nation's Sustainable Development Goals and navigate how they can contribute to the achievement of these goals.

More Information on the Sustainable Development Goals and the SDG Toolkit can be found [here](#).

How can we ensure that the 4th NBAP delivers for biodiversity and is implemented successfully?

The ambition for the plan must be increased and Departments other than the Department of Housing, Local Government and Heritage need to commit to its aims.