



**Chambers  
Ireland**  
Advancing business together



# Public Consultation on a new Strategy Statement for the National Parks and Wildlife Service (NPWS)

Submission by Chambers Ireland

January 2023

## About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our 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 to advocate for and support the advancement of the United Nations Sustainable Development Goals (SDGs). Accordingly, we use the Goals as a framework to identify policy priorities and communicate our recommendations. We have a particular focus on five of the goals encompassing decent work and economic growth (SDG 8), sustainable cities and communities (SDG 11), Gender Equality (SDG 5), Industry, Innovation and Infrastructure (SDG 9) and climate action (SDG 13).<sup>1</sup>

The SDG goals are intrinsically linked to our policy proposals and sustainability underpins our work as the voice of the Irish business community. In the context of the Strategy Statement for the National Parks and Wildlife Service (NPWS), SDG 13 and SDG 8 are the most relevant. We have consistently advocated for adequate infrastructure in the renewable energy space to meet our climate goals,<sup>2</sup> and we have contributed to the national conversation on biodiversity and afforestation.<sup>3</sup> Throughout our submissions, we place great emphasis on the urgency with which we need to combat climate change on a national scale. That being the case, we are pleased to contribute to the consultation on a new Strategy Statement for the National Parks and Wildlife Service.

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

<sup>2</sup> <https://www.chambers.ie/wp-content/uploads/2021/12/Chambers-Ireland-ORESS-1-submission.pdf>

<sup>3</sup> <https://www.chambers.ie/wp-content/uploads/2022/11/Chambers-Ireland-Submission-on-the-National-Biodiversity-Plan-Consultation.pdf>; and <https://www.chambers.ie/wp-content/uploads/2022/11/Chambers-Ireland-Submission-to-the-Department-of-Agriculture-Food-and-the-Marine-Regarding-the-Consultation-on-the-Draft-Forest-Strategy.pdf>

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# General

## Background

At a high level, Chambers Ireland welcomes the proposed strategic action plan for the National Parks and Wildlife Service. This will help to build a more resilient, adequately resourced, and effective service with the ability to protect our natural environment and heritage. This is something that the state has overlooked in recent times and we are pleased that action is being taken in this area.

Currently, approximately 67% of our land is agricultural land and approximately 11% of our land is plantation forestry.<sup>4</sup> Approximately 75% of the Irish landscape is intensely managed and most of our biodiversity is in the remaining 25%. In 2019, Ireland had 10.2% of its total land area designated as terrestrial Special Areas of Conservation (SACs) under the EU Habitats Directive. This was one of the lowest rates in the EU and below the European average of 13.7%.<sup>5</sup> Bearing these statistics in mind, there is a lot of ground to make up for and a substantial amount of action to take. A National Parks and Wildlife Service which is adequately resourced and receives the appropriate level of urgent investment will be critical to improving these figures.

## Investment and resourcing are critical to implementation

Accountability and resourcing will be of critical importance to the success of the NPWS strategy. We warmly welcome that as part of the new strategic action plan, there will be a full restructuring of the NPWS as an executive agency, along with the fast-tracked recruitment of 60 key staff to support biodiversity. However, it is our hope that the recruitment of staff with the requisite level of expertise will happen. Expertise is clearly required to carry out work in this area. The addition of scientists with adequate know-how throughout national and local

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<sup>4</sup> <https://tradingeconomics.com/ireland/agricultural-land-percent-of-land-area-wb-data.html>; <https://epawebapp.epa.ie/ebooks/soe2016/files/assets/basic-html/page-1.html#>

<sup>5</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-eii/environmentalindicatorsireland2021/biodiversity/>

government structures is pivotal. Better-paid employment positions should therefore be a priority and is precisely what the state requires to attract the right expertise in this sector.

Staffing needs to be adequately accounted for. One of the issues highlighted in the supplementary reports state that many key scientific posts have remained unfilled, meaning whole counties have gone without a dedicated wildlife ranger for years. Similarly, the report stated that staff are often tasked with covering multiple roles, due to the gaps in NPWS staff structures. It should also be stressed that investment in our local authority staff is required parallel to investment at a national level. The past decade has seen local authorities struggling to provide basic services and failure to provide them with proper resourcing will render the strategy of the NPWS ineffective on the ground.

Overall, investment in the NPWS is long overdue. The service was established in 2003 and only recently has returned to a pre-recession budget allocation. Underinvestment -including cuts of up to 70% in non-staff costs - has meant that over the past decade, it has been extremely difficult for local authorities to adequately provide the service. This situation was compounded by numerous departments taking charge of the service at different periods.

Local authorities are at the forefront of heritage protection, and they are best placed to determine the required action as they work on the ground. We welcome the proposed objectives to be completed over the next two and a half years, which include 15 strategic actions. It is our hope that they will ensure that the NPWS is resourced properly and has a robust organisational structure.

### **Independence**

As alluded to earlier, over the past 25 years, the NPWS has been moved across six Departments. The appointment, and the process for the appointment, of the CEO is going to be key in the NPWS.

It is long overdue that Ireland has a fully independent national parks and wildlife service. This should be an executive agency that will give it a degree of autonomy and independence. We

view independence as paramount to the success of the new strategy. In the past, the state has implemented independent bodies which were effective in obtaining their service-based objectives. As opposed to having the national parks and wildlife service being merely a part of a government department. One such example is the success of the Environmental Protection Agency (EPA). The EPA, went from being a weak function of a Government department to a fully independent service, with meaningful autonomy and a resourceful budget. It is our hope that a similar executive service will be afforded to the NPWS, as it is exactly what Ireland requires to adequately service its national parks and wildlife services.

### **Structural changes and the establishment of new directorates**

The establishment of the new directorates within the NPWS is welcome. We need a coordinated approach to biodiversity, to ensure that each sector will have a dedicated focus. This will aid in the monitoring of sectorial commitments and them being implemented in a manner that takes into account our national priorities. It will also aid the needs of those on the ground who face the challenges of implementing actions related to all state sectors.

### **Ending the use of temporary contracts**

Ending the use of temporary contracts over long periods is a welcome step. Full appreciation and use of people with the relevant skillsets and expertise are key components to making sure the NPWS makes full use of the knowledge that comes with these dedicated people. In line with our earlier point that positions requiring expertise need adequate salaries and remuneration, this will be key to ensuring that Ireland retains the best talent to look after the new NPWS. It will also aid the continuity of the NPWS. We have already experienced in the health sector how pivotal public services are vulnerable to disruption because professionals are not valued in terms of their knowledge and the insight they offer. If the state is to have a fully functioning service that draws on the best expertise available, then adequate remuneration

must follow. It would be remiss to overlook the available knowledge and therefore the value such professionals offer.

### **Consultation**

Consultation with communities, especially the agricultural sector is key. While circa 14% of our national territory is designated for conservation, 90% of that figure is not within public ownership. That points to a need for better consultation and co-operation with landowners. Farmers and landowners will therefore need to be supported in the context of conservation work. However, this should not entail sacrificing habitat protection for food production. It is clearer than ever that Ireland has an obligation to cut emissions as a matter of overriding public interest. Our climate targets will not be met if spurious grounds for not implementing the plan are unduly accommodated, with the result being that our climate goals are not prioritised.

# Chambers Ireland's Perspective on specific questions in the consultation

## Mission and Values

**Question 1: Looking at page 3 of the consultation document, what do you think should be the core Mission of the National Parks and Wildlife Service?**

Chambers Ireland agrees with the core Mission of the NPWS. As advocates of the Sustainable Development Goals, we are pleased to see that “care for nature” is front and centre of the Mission. However, this will not be realised unless the NPWS is given the appropriate level of investment and support by government. Resourcing will be pivotal to having an effective, independent agency which has the organisational power to care for nature on a national scale.

**Question 2: Looking at page 3 of the consultation document, what core values do you think the NPWS should be guided by?**

Chambers Ireland agrees with the core values which the NPWS is guided by. We particularly welcome the inclusion of scientific integrity in guiding the goals. Similar to our reply in Question 1, and our point outlined in the piece on temporary contracts, remuneration will be key if this is to guide the core Mission. It is of utmost importance that Ireland has the best available scientific data and the appropriate capacity to process it. This will mean employing the relevant and best staff available to collect and analyse that data. The labour market is competitive, and the historical ranking of particular professions against civil service grades needs to be reformed. Clearly, scientific expertise is currently undervalued by our state organisations; in one reply to the report accompanying the consultation document, it was stated that remuneration for these positions is set at a consistently low rate.



This results in a poor attraction rate, meaning that the selection pools for candidates are small. It is equally likely that retention of the staff is poor, and the poor rates of pay will exacerbate that problem. Similarly, better-remunerated positions in the private sector represent a more attractive option for those who are on low pay. If the NPWS is to include scientific integrity in its core values, then this will need to be taken into account.

At the very least individuals who have experience in the NPWS will be invaluable to infrastructure and energy developers who are looking to progress their projects through the planning system. We have seen this in other areas of the public service where, for example, medical scientists are paid less than the market rate for their skills (which are highly sought after in the pharma sector) this leads to understaffing in hospitals which results in delayed care and increased costs. There is a risk that the same thing is happening here. The government is planning to spend €165 billion in the NDP over the next ten years, Housing (public and private) is likely to have to increase investment to €20 billion per annum, the Climate Action Plan is likely to need in excess of €100 billion, even marginal delays that result from a slow planning process, or a planning process that continues to be mired in the courts will cost many billions to the economy, and much of that to the state directly. Ensure that the system is adequate to the challenge before it is both a relatively small, and wise investment.

### Strategic Goals

**Question 3: Looking at page 4 of the consultation document, are these the right Strategic Goals and areas of focus for NPWS - is there anything missing?**

We welcome the commitment to support economic productivity through improved sector-relevant information which is underpinned by scientific excellence. However, we re-emphasise our earlier point that there needs to be resourcing will be key to implementation. This is critical if the Strategic Goals are to be realised.

## **Scientific Advice and Research**

**Question 4: Looking at page 5 of the consultation document what are the biggest challenges that you think will face the NPWS in terms of Scientific Advice and Research Directorate over the next 3 years?**

Employing the right people, with the requisite expertise for senior positions to lead the new NPWS will be key. This is true across the directorates but is especially relevant for the Scientific Advice and Research directorate. Staffing in this context will be difficult given the traditional lack of priority and remuneration allocated to these roles. An example of this is the present lack of a senior role for the Marine Habitats and Species.

At a broad level, the ability to deliver world-class scientific advice across the NPWS will present an unachievable goal, if the current level of resourcing is maintained. This means providing the core functions of furnishing advice on conservation priorities and measures, alongside monitoring and general research responsibilities.

**Question 5: Do you have views on how these challenges can be met?**

At a high level, the Scientific Advice and Research directorate must be equipped if we are to address the sorry state of biodiversity in our national parks, and by extension attain our climate goals. A centralised function for applied research and analysis is pivotal, not only for undertaking scientific research itself, but for capturing and analysing data. It will also be important for ensuring we meet our requirements under EU law, and improve data sharing across the entire NPWS. This will be important in aiding the work of the Wildlife Crime Unit, particularly in terms of ensuring compliance with legal requirements with regard to habitat conservation, restoration programmes and protected areas.

We agree with the recommendation proposed in the Stout–Ó Cinnéide report, which calls for a Chief Scientific Adviser in the NPWS. This follows from international examples where it has worked effectively. Considering our earlier points of capacity deficits, this would aid the scientific staff in particular. A Chief Scientist would maintain and build the organisation's

technical and scientific capabilities, which is clearly an under-resourced area of the NPWS since the economic downturn over a decade ago.

We agree with the “Reflect and Renew – A Review of the National Parks and Wildlife Service” report that the absence of a dedicated senior post in respect of Marine Habitats and Species constitutes an immediate risk. A Grade 1 post in respect of the role must be established without delay and filled as a priority. Other proposed posts stipulated in the report also seem reasonable, such as the two ecologist Grade 2 positions and the additional regional staff.

**Question 6: What 3-5 major objectives do you think the NPWS should set in terms of Scientific Advice and Research over the next 3 years?**

- At a high level, providing a world-class scientific service for the NPWS which can adequately monitor our national parks and wildlife service, undertake scientific research and analyse data as required, and ensure we remain compliant in terms of our requirements under environmental law.
- Ensuring a sizeable increase in the number of core scientific staff.
- Ensuring the addition of senior positions where necessary.

**Nature Conservation**

**Question 7: Looking at page 6 of the consultation document, what are the biggest challenges that you think will face the NPWS in terms of Nature Conservation over the next 3 years?**

The state will have to take more action to restore our peatlands. This will be critical to reducing our carbon emissions, especially as 16% of Ireland is covered by peatland.<sup>6</sup> The potential exists for our bogs to play a main role in reducing our emissions, however this will only be possible if the political will exists to do likewise. Peatlands are our largest store of terrestrial carbon and

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<sup>6</sup> <https://www.cso.ie/en/csolatestnews/pressreleases/2021pressreleases/presstatementecosystemaccounts-peatlandsandheathlands2018/>

represent a nationwide land-use, and clearly one of the most controversial topics is the rewetting of our peatlands to enable sequestration. Unfortunately, short-term thinking has dominated policy in this space. For example, the most recent available data from the CSO shows that almost 5% of Irish peat bogs have been affected by drainage works under Arterial Drainage and Drainage Districts schemes. Undoing this situation alone constitutes a considerable challenge but is a matter of obvious priority.

### **Question 8: Do you have views on how these challenges can be met?**

Ireland urgently needs an action plan for blanket bog, as well as for raised bogs in the midlands. Additionally, private and commercial harvesters of turf need to be engaged with properly by the state, given how critical our peatlands are to reducing our carbon emissions. Accordingly we agree with the supplementary report that a habitat mapping system needs to be made publicly available to inform policy development, planning decisions and management action in relation to peatland and climate.

Examples exist across the globe of countries who have managed to implement plans to restore peatlands. Indonesia implemented an effective peatlands restoration plan on foot of its wildfires in 2015 which resulted as a consequence of logging, conversion to industrial forest plantations, and conversion to oil palm plantations.<sup>7</sup> The aim to restore 1 million hectares (a target of 87% of the total target area) is aided by the fact that the plan can easily be implemented in non-concession areas, namely areas that the government can restore directly. At a European level, Germany is leading the way in undertaking projects of similar ambition.<sup>8</sup>

Further research should be undertaken exploring the commercial potential for peatlands, without draining them and harming our wildlife.

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<sup>7</sup> <https://iopscience.iop.org/article/10.1088/1755-1315/995/1/012068/pdf>

<sup>8</sup> <https://www.bfn.de/en/publications/policy-brief/peatland-strategies-europe>

### **Question 9: What 3-5 major objectives do you think the NPWS should set in terms of Nature Conservation over the next 3 years?**

- Robust reform of their workplan and skillsbase to ensure the development and retention of individuals and teams that can deliver more sustainable use of our natural endowments
- Deliver international best-practice programmes on peatland carbon storage.
- Develop better relationships with landowners to support the restoration and conservation of our peatlands.
- Begin restoring our blanket bogs.
- Conduct more ambitious invasive species eradication programmes

### **Parks and Nature Reserves**

#### **Question 10: Looking at page 7 of the consultation document, what are the biggest challenges that you think will face the NPWS in terms of Parks and Nature Reserves over the next 3 years?**

A key part of the new strategy for our national parks and nature reserves should include the potential benefits of eco-tourism. Given the lack of biodiversity in our national parks, it is difficult to see a tourism industry in their present lamentable state. Historically, our most rural and wild areas are those which have low employment rates and high emigration figures. A steep challenge over the next three years will be to come up with a strategy which can help undo this, and make the NPWS a role in spreading employment, eco-tourism and therefore economic growth more evenly across the state.

#### **Question 11: Do you have views on how these challenges can be met?**

A communications strategy would also help promote the work of the NPWS, along with promoting our national parks as places of conservation. It is imperative that nature-based

tourism coexists with nature conservation,<sup>9</sup> the former will not exist without the latter. The potential exists to enable a recreational industry which does not endanger our species and habitats, and which instead can contribute to economies where historically low levels of employment exist. This will also translate into eco-tourism benefits and paint a picture of Ireland which is not superficially 'green' in terms of monocrop deserts, but where a plethora of biodiverse species and habitats exist. Examples of successful national parks attracting tourism exist across the globe, however conservation will be key to the success of bringing our national parks to this level.

To that end, local government will have to be consulted to communicate the benefits of adequate conservation and safeguarding of our parks. Local communities – especially landowners – will also need to be consulted to highlight the economic benefits of conserving our parks. Similarly, we should be expanding educational programs and facilities for eco-tourists visiting national parks, to maintain a balanced relationship between themselves and nature, and to ensure environmental awareness.

**Question 12: What 3-5 major objectives do you think the NPWS should set in terms of Parks and Reserves over the next 3 years?**

- Implement a strategy to make our national parks a hub for eco-tourism.
- Increase resourcing across the board.
- Build better relationships with local Government and build trust with local communities.

**Legislation and Licensing**

**Question 13: Looking at page 8 of the consultation document, what are the biggest challenges that you think will face the NPWS in terms of Legislation and Licensing over the next 3 years?**

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<sup>9</sup> <https://www.mdpi.com/2073-445X/11/11/2066>

As per the Stout-Ó Cinnéide report, our requirements under EU law – such as those stipulated in the Habitats Directive – will remain unattainable. The mandate of the NPWS must therefore align with the EU Biodiversity Strategy. 30% of our land and sea must be protected by 2030, with 10% being strictly protected. Our national record in this area is dismal and this inability to meet our requirements and meet our goals is reflected in the available data, which shows as referenced previously, only 10.2% of our total land area is designated as terrestrial Special Areas of Conservation (SAC's) under the EU Habitats Directive.<sup>10</sup> As the situation progressively gets worse, so too will our requirements under international. This will increase the strain the NPWS will be put under.

Similarly, judicial reviews constitute a significant challenge. The NPWS International Benchmarking Study 2021 stated that in 2018, 19 judicial reviews were in process in Ireland; the figure for 2019 was 22, while 2020 had 16 judicial reviews. Cumulatively, these represent a significant number of judicial reviews which are made all the more complex considering a proportion were referred to the European Courts. For context, some of these focused on issues such as the State incorrectly transposing EU Directives relating to land use plans. Ultimately, this is down to the inability of the NPWS in providing the service it is tasked with, which as we have alluded to is down to underinvestment and under-resourcing, but also political will; i.e the failure of the Oireachtas to transpose Directives on time and the complete lack of interest shown by our politicians in the protection of nature and biodiversity.

#### **Question 14: Do you have views on how these challenges can be met?**

In terms of resourcing, the NPWS will need to ensure it has the capacity to shape how the requirements listed in the Directive is achieved. Adapting to extra requirements will be a priority, and we agree with the recommendation that organisational restructuring is key to this.

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<sup>10</sup> <https://www.cso.ie/en/releasesandpublications/ep/p-eii/environmentalindicatorsireland2021/biodiversity/>

Specifically, we agree with the report that NPWS Review Report that the staffing of the Conservation and Protection directorate should be structured. Staff should be drawn from the Peatlands Conservation & Restoration and the Conservation Measures directorate. Regional teams on the ground, for areas outside of National Parks and Nature Reserves, should be strengthened and report into this directorate. The permanent standing committees referenced in the report will also aid in appropriately managing crosscutting issues such as the peatlands, biodiversity, habitat and species conservation, and site designations.

Judicial reviews will need to be mitigated. Similarly, the best way of preventing future infringement proceedings is to ensure we meet our targets. Rehabilitating and restoring our peatlands will play a major role in meeting our legislative requirements under EU law to offset our greenhouse gas emissions by at least 55% by 2030. Collaboration with other state bodies is a must, if the NPWS is to be effective in ensuring Ireland meets its climate targets. At a high level, we recommend collaboration between the NPWS and the Office of Public Works in designing and implementing ecologically-sensitive flood mitigation efforts. Bord na Mona's Biodiversity Action Plan will also need to be considered. 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. The Department's planned resourcing of efforts to control invasive alien species are to be welcomed. This is consistent with our policy positions outlined in our submission to the consultation on the 4th National Biodiversity Action Plan.<sup>11</sup>

Though restructuring and collaboration is necessary, they can only go so far. The NPWS can only act within the parameters of the relevant legislation and policies such as the biodiversity plan, in meeting the challenges exemplified by our poor record on carbon emissions. An example of this is the fact that while the NPWS is tasked with removing invasive alien species from the national parks, the list of affected species is not all-encompassing. At present, it is unclear whether non-native deer are excluded from the list. The issue of sheep and goats overgrazing commonage, upland bogs and destroying hillside environments goes unmentioned

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<sup>11</sup> <https://www.chambers.ie/wp-content/uploads/2022/11/Chambers-Ireland-Submission-on-the-National-Biodiversity-Plan-Consultation.pdf>



in our biodiversity plan. Clearly, there is nothing the NPWS can do in this space if the national policy in practice prevents it from taking action. This ensures Ireland does not meet its requirements under EU law, thereby putting the State at further risk of incurring infringement proceedings. Ultimately, this would ensure that our record on climate change remains dismal.

**Question 15: What 3-5 major objectives do you think the NPWS should set in terms of Legislation and Licensing over the next 3 years?**

We view the following three objectives as being of utmost importance:

- Properly engaging with the EU Biodiversity plan, to ensure at a minimum that 30% of our land and sea are protected.
- Rehabilitating and restoring our peatlands to ensure adequate carbon sequestration and making this front and centre of our goal of offsetting our greenhouse gas emissions by at least 55% by 2030.
- Major increase in the number of scientific and expert roles, with increased remuneration.

**Wildlife Enforcement and Nature Protection**

**Question 16: Looking at page 9 of the consultation document, what are the biggest challenges that you think will face the NPWS in terms of Wildlife Enforcement and Nature Protection over the next 3 years?**

The Stout-Ó Cinnéide report has highlighted that the Wildlife Crime Unit does not have the resources available to carry out its tasks. This is especially concerning, as such a unit is key to safeguarding Ireland's species and habitats. It is a positive step that a Memorandum of Understanding has been signed by the NPWS and An Gardaí Siochána, however, under-resourcing in this area means that logically enforcement is on the whole ineffectual. This is substantiated in the supplementary report. As an example, the report highlights instances of systemic failure to adequately investigate where wildlife has been poisoned. Remedying the lack of enforcement should be an urgent priority for the short term.

### **Question 17: Do you have views on how these challenges can be met?**

It should accordingly be allocated enough funding to have an effective crime enforcement unit. It is a reasonable proposition to move the unit to the Conservation and Protection directorate. This would aid the unit in providing specialist input on a regional level. To that end, we agree with the supplementary report which proposes that a wildlife task force is needed to assist rangers and DCOs across the country with tackling wildlife crime. This would largely involve organising large operations to investigate poaching of and/or trade in endangered species.

Coupled with the enforcement remedy, it is imperative that a statutory basis is introduced to protect our National Parks. This is required to provide statutory underpinnings for our National Parks and the work of the NPWS in protecting and conserving threatened and endangered animals, plants and habitats in the State. Any such legislation should ensure that the powers of the Minister are clearly laid down regarding the operation of our National Parks and nature reserves. This will ensure the NPWS is supported in undertaking its role as the guardian of our national parks and wildlife.

### **Question 18: What 3-5 major objectives do you think the NPWS should set in terms of Wildlife Enforcement and Nature Protection over the next 3 years?**

- Implement a wildlife crime group to help investigate wildlife crime.
- Encourage greater coordination between regional staff and especially An Gardaí Síochána. This is necessary to protect rangers and carry out enforcement actions.

### **Engagement and Corporate**

#### **Question 19: Who do you think are the most important audiences for the work of the NPWS?**

The courts will be the most important audience for the NPWS, Through the minister and the department they advise planning authorities. These advices will come under intense scrutiny so it is critical that they are carried out to the highest standards. For this to be possible the NPWS

need to have sufficient technical staff working together in multidisciplinary teams to ensure that any advice which is issued will be able to survive the greatest scrutiny.

The NPWS needs to help landowners develop a better understanding of the resources they have in their care, and the value in preserving what we have. They need to work with landowners in the management of land assets. Collaboration with planning officials is also important to make sure that they can pre-empt issues and ensure that their decision-making processes are adequate, so that they will be able to survive judicial review.

The NPWS needs to work with developers, to ensure that they are aware of their obligations in advance of them filing planning applications. The public is also an important audience. The NPWS needs to ensure that the public is aware that there is a body that has a duty to protect our environmental resources, and to develop trust in the institution that they are both adequate to that task and are pro-active about it.

**Question 20: What do you think are the best ways for the NPWS to reach those audiences?**

There should be a department established within the NPWS that reaches out to stakeholders. It should have a structured format of requesting and supplying data from stakeholders, and it should be tasked with handling and distributing data. The department will need to come up with targeted and tailored programmes for each of the audiences we have stipulated.

In particular, planning will be central to programmes aimed at the courts, developers and planning officials. This will be critical to ensure applications do not fall by the wayside. Regarding landowners, we view the NPWS as having an educational role. Similarly for interacting with the public, the NPWS should use its position to run informational campaigns on issues related to the environment, sustainability, and conservation. This will be essential to attracting customers, raising funds, and keeping operations up and running.

## Major cross-cutting and Strategic issues

### **Question 21: What do you see as the most important strategic and cross-cutting issues for the NPWS over the next 3 years?**

We have two primary cross-cutting concerns which we highlighted in our submission on the Draft Forest Strategy.<sup>12</sup> Firstly, we believe the NPWS should be involved in the opportunity to establish a carbon market in Ireland. We believe that this should be explored as a matter of national importance and expanded upon further. We have heard concerns from our network relating to difficulties in meeting binding climate targets. This Forest Strategy could offer an opportunity to explore and develop a carbon market that works for the sector, works for businesses and works for the environment.

Secondly, the NPWS should also focus on the pressing issues relating to waterways and we believe that it should have a role to play in the promotion of forestry as a service. Forests have been proven to reduce the leaching of nutrients from agricultural soils, which can have a negative impact on the quality of water supplies in an area.<sup>13</sup> They can also help regulate floodwater and reduce soil erosion. As outlined in our submission on the fourth National Biodiversity Action Plan,<sup>14</sup> narrowing our land use over time has meant that our land has become less effective at retaining water, which amplifies both the impact of droughts and the effects of flooding. Similarly, resinous monocrop pine plantations on dry peat soils are likely to be especially vulnerable to fires and this can result in the significant emission of greenhouse gases through the accumulations of carbon as the thick fuel soils burn. Chambers Ireland's Chief Executive, Ian Talbot, was recently (26th November 2022) invited to speak at the Citizen's Assembly on Biodiversity Loss in Ireland and made this point – "Our water supplies are dependent on improving the health of our land". A robust forest strategy that prioritises biodiversity and sustainable forest management, can improve our natural environment in an

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<sup>12</sup> <https://www.chambers.ie/wp-content/uploads/2022/11/Chambers-Ireland-Submission-to-the-Department-of-Agriculture-Food-and-the-Marine-Regarding-the-Consultation-on-the-Draft-Forest-Strategy.pdf>

<sup>13</sup> <https://www.teagasc.ie/news--events/daily/environment/the-importance-of-trees-in-ireland.php>

<sup>14</sup> <https://www.chambers.ie/wp-content/uploads/2022/11/Chambers-Ireland-Submission-on-the-National-Biodiversity-Plan-Consultation.pdf>

abundance of ways that can benefit everyone. We therefore believe that greater recognition could be given through the funding streams to the additional benefits that afforestation could have on essential services, the Irish economy, and society more broadly. This could create greater incentives for farmers and other private landowners to invest in forestry and to make it a much more attractive and viable option for their land.

**Question 22: Do you have any other observations that you would like us to take into account when forming our Strategy for the next 3 years?**

Chambers Ireland does not have any further comments to make regarding strategy for the next three years.