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Clare Public Participation Network Submission to the 4th National Biodiversity Action Plan:

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Clare PPN is a network of 342 community & voluntary, environmental and social inclusion groups from Clare. Clare PPN has three 'Colleges' which gather the member groups in terms of their interests and activities - these are environmental college, social inclusion college and community and voluntary college. Clare PPN exists to facilitate the formal participation by the community sector in Clare County Council's decision-making structures and to serve as a support and information sharing network for the Community and Voluntary Sector in Clare. It is funded jointly by the Department of Rural and Community Development and Clare County Council but is autonomous and its activities are directed by its members through an elected secretariat.

Clare PPN's website is www.clareppn.ie and we are on Twitter @clare_ppn and facebook.com/clareppn.

Clare PPN environmental college welcomes this opportunity to contribute to the consultation on the 4th National Biodiversity Action Plan. Each submission made by Clare PPN results from direct consultation with our member groups and from work done to ascertain their views and aspirations for current and future generations. In this case, the recommendations contained herein result from work carried out in 2020 and 2021 to create wellbeing vision statements for county Clare, from motions passed at our plenary meetings in 2022, from submissions made to other consultations and from recommendations made by participants at a special purpose meeting to discuss our input to the Citizen's Assembly on Biodiversity Loss which is currently taking place.

Clare PPN Wellbeing Vision Statement Adopted January 2021:

Clare is a county that values, protects and restores its unique landscape, environment and biodiversity, where sustainable livelihoods are prioritised for this and future generations and where citizens, migrants, ethnic minorities and people of all abilities, age groups and genders can reach their potential in an atmosphere of support, respect and inclusion, and where Local Government is open, transparent, accountable and committed to reducing poverty and

marginalisation within the County. Our vision is for a County to be part of and a County to be proud of.

To read our full wellbeing vision for County Clare see link: [WellbeingVision-CLARE-jan-2021.pdf \(clareppn.ie\)](#)

Our recommendations for the consideration are as follows:

1. We have noted from our engagement with local government that there is an incomplete or partial understanding across many departments of the essential and urgent need for the protection and restoration of biodiversity – for example we have heard biodiversity discussed as adding aesthetic value to an area or increasing tourism potential rather than being essential to all life on earth. We would recommend that one task this consultation could assign itself is the adoption of a working definition of biodiversity that could be accepted and used right across governments and departments. The assembly could further recommend a short training on understanding this definition and its implications being disseminated across all state agencies and government and civil servants.
2. We note the pioneering work and comprehensive submissions made to the Citizen's Assembly on Biodiversity Loss by the Environmental Justice Network Ireland which deals with establishing and enshrining 'The Rights of Nature' in legislation up to and including the constitution. We further support their call to recognise in Ireland the crime of ecocide. Our member groups themselves passed a motion at a plenary meeting that Clare PPN would approach its environmental lobbying, education and activism from a 'Rights of Nature' perspective and whilst we are ourselves still learning about this concept our understanding leads us to recommend that the department would also benefit from doing so. We consider that in particular a rights of nature approach would help to move the culture in Ireland to one of respect, interconnectedness and regeneration rather than one of extraction when it comes to nature.
3. We note and agree with the submission made by the Irish Wildlife Trust in relation to Ireland's role and position on the Global Deal for Nature or 30 x 30 as it is known:
"In December this year, the government will be represented at COP15 in Montreal² where, it is hoped, the international community will agree on a framework for protecting and restoring biodiversity at a global level. It is hoped that a headline commitment will be the protection of 30% of land and sea area by 2030, known as 30x30 in shorthand. Ireland will negotiate as part of the EU team at this meeting and the EU has already committed to 30x30 in its Biodiversity Strategy. However, while some countries like France and Germany, have signed up to this goal, Ireland has only signed up to protect 30% of the sea. This is not leadership. Ireland could, and should, commit to protecting 30% of land by 2030, in a just and ecologically coherent way. If done correctly it could be a defining project for the country that activates local communities and landowners in a hugely positive way."

Clare PPN would like to see Ireland show leadership and commit to establishing protective and restorative measures for biodiversity on at least 30% of our land by 2030. Our members would also like to ensure that the legislation supporting these commitments would properly define these protections to ensure that these areas become interconnected havens for biodiversity, which in turn will help to restore the biodiversity of surrounding land also. We further wish to see marine life firmly included in these

protections, Ireland has already made commitments to establish 30% of its marine areas as MPAs - our members wish that the same attention to the legislation is paid to ensure that these protected areas are real havens for marine life rather than paper exercises where damaging extractive industries can continue to operate within them.

3.1 In line with the recommendation that Ireland fully adopt commitments to the Global Deal for Nature 30x30, Clare PPN recommends that the Irish state should begin to take a proactive approach to expanding our national park areas. This recommendation is made in the knowledge that currently the conditions and habitat protection in Ireland's National Parks leave much to be desired. We call on the state to face up to its responsibilities and to properly resource the National Parks and Wildlife Service and to understand that in so doing there are opportunities to increase social inclusion through supported employment, social farming and social enterprises as well as through the recruitment of qualified experienced biodiversity and wildlife specialists. We further call on the state to purchase or acquire lands as they come available for sale in areas adjacent to the existing national parks. This will allow the parks areas to expand as well as providing the necessary buffer zones to ensure that the park areas themselves can thrive. We recommend that to this consultation that such purchases are in the long term interests of the state, its residents and citizens and if properly managed in the long term interest of nature itself.

4. **The concept of 'net loss'** Clare PPN's participants are extremely concerned to see a concept emerging in local policy making and in some international spheres of preventing 'net loss' of biodiversity - in relation to biodiversity this is a flawed concept, aspects of areas of biodiversity are not interchangeable- nor are they equal value 'tokens' which can be traded. High biodiversity areas can include centuries of evolution and interconnected ecosystems which are irreplaceable once lost. We would strongly call on this action plan to eschew such approaches if enshrined further in policy making this concept has the capacity to do extreme harm even whilst those involved in such 'trading' of biodiversity may believe they are working in sync with nature. We are further extremely concerned to see the apparent emergence of a biodiversity credits trading system emerge (Australia) where apparently biodiversity damage may be offset through a credits system. We would like the BAC to ensure that it moves away from extractive approaches to nature.
5. It has come to our attention that not all local authorities have biodiversity officers -as an agency with significant impact on biodiversity across Ireland we would request that this is rectified and that these officers are furnished with sufficient project budgets to provide leadership and establish projects in their areas. We note and commend County Clare's Heritage Officer Congella McGuire for the many achievements she has made in the areas of biodiversity projects and awareness raising in recent years, including the 'Hares Corner' project most recently developed. We recommend that full time heritage officers and biodiversity officers are employed in each local authority and that they are resource and supported. From our experience within PPNs we would consider that these roles would need to be positioned at a minimum at the equivalent of a Grade 7 on the local authority pay scales. We are extremely pleased to see the development of new Climate Action teams within local authorities however we consider the roles above to also be crucial in ensuring that in the urgent cause of carbon reduction that protection of biodiversity is given sufficient weight and support. It is quite possible that in our quest to reduce carbon emissions actions, or decisions which have severe negative impacts on biodiversity could be taken. The inclusion of heritage and biodiversity officers within

these teams at a level senior enough to impact decision making will be a necessity. Please note that heritage deals with sense of place, with memory, tradition and understanding the layers of human impact on the environment and as such has much to add to efforts to protect and preserve our biodiversity.

6. **Whole of Government Policy Coherence:** Despite the fact that in many areas we have very strong policies on climate action and biodiversity our groups have raised in consultation after consultation the frustration they experience when government policies, planning decisions and even funds are used in ways that are contrary to our climate action and biodiversity and to our international commitments. We are calling for a whole of government approach - our energy, transport, industrial, economic development, food production and farming, forestry, fishery and marine policies need to complement each other and contribute to the necessary reductions in carbon emissions - 51% over the next 8 years, and net zero by 2050 whilst restoring and protecting our biodiversity. The new Climate Action Plan must apply to all departments and all state agencies and its provisions must be adhered to, we would like to recommend to this consultation that the Biodiversity Action Plan is put on a similar legislative footing and is understood to apply to all departments and state agencies. In case there is any ambiguity in this recommendation our participants are calling for the state to stop actively harming our environment and stop permitting the extensive harm to our environment that is enacted by other agencies and industry.
7. Our participants expressed a strong desire to see the rewetting of bogs continue and expand. While they fully understand the need for dialogue and respect for existing traditions and ways of life they also consider it extremely important that the benefits in terms of carbon sequestration and habitat restoration are explained and shared. They note that there has been much discussion of as yet relatively unproven technologically based methods of extracting carbon from our atmosphere that in fact bog restoration and rewetting is a proven method which is comparatively inexpensive and available to us here in Ireland. They consider that the BAC should recommend in all such cases a properly resourced just transition programme where dialogue and co-decision making are embraced. We note that in many cases in Ireland just transition is used by government more as a compensation scheme rather than an opportunity for open dialogue and community derived solutions. This BAC could take the first steps in making sure that Ireland revisits its approach and understanding of 'Just Transition' practices in order to ensure that communities affected by actions to protect biodiversity are engaged and involved in designing the actions which will take place in their communities and that those who are more vulnerable to negative consequences of change are protected from those consequences.
8. Our participants noted with great interest the level of ambition and action by the recently emerged not for profit group 'HomeTree' Hometree and its 'Wild Atlantic Rainforest Project' we encourage the BAC to familiarise itself with this project in order to see what other similar large scale afforestation or forest regeneration projects could be viable. Our participants noted the need for a shift away from monoculture forestry and the need for reform of Coilte and its approach to the 7 % of Ireland's land mass under its control. They consider many of its current practices to be harmful but consider that it has huge potential to be part of a real solution in regenerative and native forestry as well as the establishment or reestablishment of habitats for native species. Our participants noted too the submission from the Clare- based Woodland League to the Citizen's Assembly

on Biodiversity Loss which calls for the urgent protection of Ireland's Native Ancient Rainforest Remnants which current cover only .2% of Ireland's landmass. We strongly agree with this submission that these remnants need to be protected, restored, expanded through regeneration, and where possible connected to each other through corridors of land acquired by the state for that purpose.

9. Our participants noted the wide variety of methods used to identify areas which are categorised as deserving of environmental protections – SACs, MPAs, SPAs, NHAs, Refuges for Fauna and Nature Reserves, they recommend to that streamlining, and awareness raising about what each of these designations mean and what laws apply in them are necessary- both for the general public and for state agencies and industry. Alongside the call for an expansion of our national parks and for the protection of 30% of our land mass it appears that it might be an opportune time for Ireland to look at an overarching set of guidelines for protected areas that could be widely disseminated and adopted by all state agencies, industry, economic and amenity land users.

10. Our participants discussed the need for balance and an understanding that humans are part of the ecosystems and depend on the nature which surrounds us, that humans are nature, and that our needs too must also be considered as part of the citizen's assembly on biodiversity. In trying to discuss this concept the word 'eudaimonia' was used and our participants wanted to include it in this submission as a way of framing what a human life well lived in a world where biodiversity is protected and restored.

We thank you for the opportunity to make this submission and welcome any queries in respect of it,

Yours Sincerely,

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