



Environmental
Pillar



RECOMMENDATIONS HOW TO RESTORE NATURE IN IRELAND

Environmental Pillar
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Environmental Pillar Recommendations: How to Restore Nature in Ireland

Introduction

The Environmental Pillar welcomes the opportunity to contribute to the first public consultation on Ireland's draft National Nature Restoration Plan (NRP). This submission was a collective effort drawing on the expertise of our network of almost 40 national environmental NGO's. Collectively, our coalition has strongly advocated for the adoption of the Nature Restoration Regulation (NRR) at both Irish and EU level, and we have been proactive throughout its development, including by commissioning Natural Capital Ireland to publish the *High-Level Recommendations for Funding Nature Restoration in Ireland*¹. We have actively participated in the Independent Advisory Committee (IAC) on Nature Restoration, the Leaders Forum, and the Community Conversations. In the IAC, we represented the environmental sector and worked constructively with all stakeholders to help shape and secure almost 100 consensus recommendations.

In addition, we have invested significant resources in citizen science, GIS mapping, and the development of key recommendations to inform the design and implementation of the Nature Restoration Plan, and we remain ready to share this work with the Irish authorities should they be open to engaging.

Our detailed submission is divided into **Key Enabling Actions** and recommendations on the **Key Restoration Articles** (Articles 4 to 13). In total, we submit over 300 recommendations that we believe are necessary to fully implement the legal obligations of the Nature Restoration Regulation and place nature on the road to recovery in a way that empowers and enriches stakeholders and communities.

Key Enabling Actions

High-level Observations of the Draft Nature Restoration Plan

The Nature Restoration Regulation is the most ambitious nature law to emerge from Europe in over 30 years, recognising that restoring nature must go far beyond protected sites and extend across the full landscape and seascape, including farmland and urban areas. Its real-world impact, however, will depend entirely on the Nature Restoration Plan designed to implement it, and on the strength of the supporting implementation framework, including adequate funding, robust monitoring, and full transparency.

¹ <https://www.ien.ie/app/uploads/2025/07/Funding-Nature-Restoration-in-Ireland-FINAL-REPORT.pdf>

Recommendation: An Ambitious Nature Restoration Plan - Deliver an ambitious Nature Restoration Plan for Ireland that fully meets the legal obligations of the Nature Restoration Regulation, underpinned by a transparent implementation framework clearly setting out why, where, how, and by when restoration measures will be delivered.

Public Participation

Ireland's use of a three-tier framework to ensure broad public participation was genuinely a leading example at EU level. The Independent Advisory Committee (IAC), Leaders Forums, and Community Conversations have provided clear insights and a strong public mandate to help shape the NRP. The Environmental Pillar contributed to the Independent Advisory Council, and many of our priorities are reflected in the IAC's final recommendations². The cross-sectoral support for ambitious nature restoration within the IAC recommendations highlights the strong consensus among key stakeholders in the farming, fishing, forestry, and environmental communities on how the Government must proceed.

We support the recommendations of the Independent Advisory Committee on Nature Restoration, which reflect the strong consensus among key stakeholders, subject matter experts, and civil society on how the Government must proceed with the design and implementation of the NRP. Collectively, the work of the IAC, Leaders Forum, and Community Conversations builds on the work of the Citizens' Assembly on Biodiversity Loss and presents an overwhelming mandate to the Government on how to tackle the biodiversity crisis.

Recommendation: Fully implement the recommendations of the IAC, while ensuring the final NRP and any associated national strategy is also aligned with the views of the Leaders Forum and Community Conversations.

While the three-tiered engagement framework did provide broad engagement through grassroots public participation and consensus-building across key stakeholders, it did not generate deep engagement with key stakeholders on the specifics of the plan. For example, the National Parks and Wildlife Service (NPWS) only held one bilateral meeting with the Environmental Pillar, at which we were actively discouraged from sharing detailed information, including valuable inputs such as data and GIS mapping that should be used to inform the NRP. We therefore believe stakeholders have not yet been adequately engaged on key aspects of the plan that will inform where, when, and how restoration will be undertaken.

Recommendation: Structures for inclusive engagement are in place, but so far they have delivered broad rather than deep participation. A lack of transparency and limited willingness on the part of key authorities have restricted stakeholder and expert engagement on target setting, site selection, and management measures. Deeper engagement, collaboration, and data exchange between authorities, civil society, and subject matter experts are needed moving forward to ensure the best possible NRP.

² <https://www.restorenature.ie/>

All-of-Government Approach

Ireland has adopted a coordinated all-of-government approach, with multiple departments leading relevant elements of the plan. Structured interdepartmental expertise is delivering a collaborative effort across four technical interdepartmental working groups — Land, Urban, Marine, and Finance — bringing together subject matter experts from across Government to establish baselines, identify data gaps, and propose evidence-based restoration measures.

Despite many positive aspects of this approach, it is clear from the current draft NRP that not all departments are demonstrating the necessary ambition and that certain departments are limiting the ambition of the draft NRP. Examples include the failure of housing officials to engage with the IAC and the fact that Article 8 reporting requirements within the draft NRP are blank. Many critical sections being driven by the Department of Agriculture, Food and the Marine are not ambitious enough to meet the requirements of the NRR. In places where leadership and vision are needed to chart a course to achieve targets to 2030 and beyond, we have been presented with an existing list of measures from the current CAP Strategic Plan and Forestry Programmes that are not aligned with the 2030 targets, and no indication has been given that the next programmes will be coherent with the NRR. On the marine side, we have seen insufficient evidence that fisheries officials are working to resolve the conflicts between destructive fishing practices and marine conservation.

Recommendation: Far greater leadership is needed from relevant Ministers and Departments to ensure an all-of-government approach that delivers an NRP that is ambitious and legally compliant.

Ambition

Ireland has some genuinely world-class conservation initiatives that already demonstrate the blueprint for how ambitious nature restoration can be delivered at scale. These existing projects are underpinned by talented professionals, committed custodians, and dedicated communities. The NRP presents the opportunity to upscale, deepen, and expand the positive impacts of these best-practice projects. This is clearly recognised in the draft NRP, where a range of current projects are highlighted. The draft plan says it is envisaged that 2030 targets will be based mainly on continuing existing schemes, but it also recognises that scaling up incentives, filling knowledge gaps, building capacity, and strengthening stakeholder participation is essential.

While we agree with this approach, it is questionable whether existing measures will be sufficient to meet the 2030 targets, particularly in relation to the re-establishment of key habitats or addressing key pressures such as water pollution. The detail is also missing on what gaps need to be addressed to achieve the targets for 2040 and 2050. In some instances, current approaches are not fit for purpose and a sea-change in approach is needed. Examples include the urgent need for a network of Marine Protected Areas, a new approach to native woodland re-establishment and an evidence based approach to reducing agricultural pollution.

Recommendation: Build on best practice, but go further — Ireland should scale up its existing best-practice conservation projects, but the draft NRP must also identify where current measures will not be enough to meet 2030, 2040, and 2050 targets.

Transparency

There are some significant gaps in the draft NRP. Some of these stem from the flawed nature of the reporting template, which does not cover all of the legal obligations of the NRR. It is unclear how Ireland can produce an NRP that is legally compliant, how this compliance can be attested to by the Commission, or how implementation can be monitored unless these gaps are addressed. In other instances, the information requested by the template is too high-level or irrelevant to the actual targets in the NRR to provide a proper framework for the NRP.

There are other areas of the template where, at this stage in the development of the NRP, they are simply left blank or the information provided is insufficient. It is critical that these gaps are closed for the second-stage NRP public consultation that will take place in 2027, and we acknowledge that the authorities have committed to providing a more complete overview of the NRP targets and foreseen delivery mechanisms.

Recommendation: The Draft NRP contains significant gaps, and these gaps must be addressed to ensure the Plan is legally compliant, monitorable, and capable of meaningful implementation.

The high level of information and the gaps within the Draft NRP create significant uncertainty around how the Commission and civil society will be able to monitor, and assess over time, whether the NRP is in fact being implemented and is legally compliant. There is no clarity across Member States on whether the final draft plans will be made publicly available. There is insufficient information on where, when, and how habitats will be restored, and based on some of the information within the draft plan — such as the proposed 10 x 10 km grid reporting framework — it appears that it will be impossible to meaningfully monitor the design and implementation of the plan. What is most concerning is that these shortcomings appear designed to obscure transparency, public participation, and accountability.

Recommendation: Ensure transparency and accountability — The final Nature Restoration Plan must be fully transparent, with clear information on where, when, and how habitats will be restored, so that the Commission, civil society, and the public can meaningfully assess legal compliance and progress over time. The Plan should be published in full and supported by a monitoring framework that enables genuine public participation, accountability, and effective scrutiny.

Political Leadership & Governance

The Failure of Political Leadership as a Driver of Biodiversity Loss

In May 2019, the Dáil declared a climate and biodiversity emergency. However, this political manoeuvre was not backed up by the political leadership needed to resolve the deeply

entrenched national policies driving the crisis. While public awareness and the amount of attention given to the biodiversity crisis has increased in recent years, this has not been accompanied by definitive political action.

The Citizens' Assembly on Biodiversity Loss said the State must take "*prompt, decisive, and urgent action*" and explicitly expressed disappointment at the State's failure to adequately fund, implement, and enforce existing laws and policies. The political response to the Citizens' Assembly further underlined the failures in political leadership. Handing a clear mandate to act, the Assembly made 159 recommendations. Yet what significant changes have occurred since its conclusion in April 2023? The Government's response was only published in October 2024, and implementation remains inadequate.

This lack of political leadership is not unique to Ireland and indeed has been one of the key reasons why the Nature Restoration Regulation is necessary to ensure that action is taken.

Ireland's State of the Environment Report 2024 repeats that the Assembly was disappointed by the State's lack of implementation and enforcement of national biodiversity legislation, and it frames biodiversity decline as having serious social, political, and economic consequences.

Ireland is on the fifth iteration of the National Biodiversity Action Plan, which promised a whole-of-government approach and accountability across departments and public bodies. To date, there has been little change within the State when it comes to addressing conflicting policies on land or at sea.

As the Citizens' Assembly stated: "*Lack of political leadership, weak implementation, and insufficient enforcement are recognised drivers of biodiversity loss in Ireland, and international evidence shows that political backsliding and delayed action can directly undermine conservation outcomes*".

Internationally, research confirms that "*biodiversity loss is not just an ecological failure; it is also a governance failure, where political hesitation, weak enforcement, and policy rollback allow decline to continue*". A landmark Cambridge University study found that "*ineffective national governance is the strongest predictor of declining species numbers*" globally, often associated with "*lack of environmental enforcement and investment, leading to habitat loss*". The opposite is also true as we have seen in the recovery of whale species internationally and of Iberian Lynx in Spain following decisive political leadership.

Political leadership is key to:

- **Addressing conflicting government policies** - The State is the greatest serial transgressor of environmental law, with policies that undermine nature protection often approved at the highest levels.
- **Addressing funding and capacity challenges** that have driven biodiversity loss through neglect, nationally but even within our national parks and protected areas.
- **Unlocking the potential of public lands** - State-owned land represents a significant opportunity for nature restoration that remains underutilised due to lack of political will and cross-departmental coordination.

Recommendations on Political Leadership and Governance

The Environmental Pillar supports the recommendations of the Independent Advisory Committee (IAC) on the need to provide clear and coherent governance for nature restoration. We particularly endorse the following recommendations:

Recommendation: Establish a National Nature Restoration Strategy - The Government must establish a comprehensive National Nature Restoration Strategy that provides a clear, long-term framework for delivering on Ireland's Nature Restoration Regulation obligations. The level of detail included in Ireland's draft NRP template is totally inadequate to meet the legal obligations of the NRR or to allow monitoring of implementation.

Recommendation: Establish Oireachtas Committee Oversight - An Oireachtas Committee oversight mechanism must be established to bolster political accountability. Oversight of the implementation of the National Nature Restoration Plan (and the National Biodiversity Action Plan) should be assigned to a relevant Oireachtas Committee, with the power to:

- Engage directly with the Minister for Housing, Local Government and Heritage
- Evaluate the implementation of the Plan on an annual basis
- Call witnesses from government departments, agencies, and stakeholders
- Publish reports with recommendations for improvement
- Monitor progress against key biodiversity indicators

This oversight is essential to ensure that political commitment translates into action and that progress (or lack thereof) is transparently reported to the public.

Recommendation: Provide Independent Oversight Through the National Biodiversity Forum - The scope of the National Biodiversity Forum's oversight role must be broadened beyond the National Biodiversity Action Plan to include independent oversight of the implementation of the National Nature Restoration Plan. The Forum should:

- Publish annual independent assessments of progress
- Have access to all relevant data and information
- Include representation from farming organisations, environmental NGOs, academia, and community groups
- Make public recommendations for course corrections where needed

Recommendation: Establish Task Forces for Delivery - The Minister must establish Task Forces headed at the Assistant Secretary level to ensure cross-departmental delivery of key objectives for the National Nature Restoration Plan. These Task Forces should be styled on successful examples such as the Accelerating Infrastructure Delivery, National Energy Affordability, and Accelerating Renewable Electricity Task Forces.

Priority Task Forces should include:

- **Nature Restoration on Public Lands** – coordinating restoration across Bord na Móna, Coillte, NPWS, and other state-owned land
- **Sustainable Flood Management** – integrating nature-based solutions with flood defence infrastructure
- **Agricultural Ecosystems Restorations** – ensuring coherence between CAP and Nature Restoration Plan delivery

- **Peatland and Organic Soils Restoration** – coordinating climate and biodiversity objectives on organic soils

Each Task Force must have:

- Clear terms of reference and deliverables
- Representation from all relevant departments (DAFM, DHPLG, DCCAE, etc.)
- Stakeholder representation including farmers, NGOs, and community groups
- Regular reporting to the Minister and Oireachtas Committee

Strengthen Cross-Border Cooperation on Our Shared Island

Our shared island nature is a shared cross-border, cross-community obligation and opportunity. In order to meet our national nature restoration obligations, and in recognition that nature knows no borders, Ireland must continue to work with counterparts in Northern Ireland to restore nature.

Despite the shared nature of almost all environmental challenges, cooperation on shared environmental issues remains under-developed, with separate governance structures, legal frameworks and implementation processes operating north and south of the border. In addition, the increasing potential for regulatory divergence creates challenges for delivering coordinated action, including risks of regulatory gaps, differences in implementation, reduced coherence between systems and increased barriers to cross-border cooperation. This fragmentation creates a significant challenge for delivering effective nature restoration. Restoring ecosystems requires coordinated action across entire landscapes: protecting connected habitats, improving water quality across shared river basins, addressing nutrient pollution, restoring peatlands and wetlands, and ensuring species can move through functioning ecological networks. A fragmented approach risks addressing symptoms in one jurisdiction while pressures continue elsewhere.

The development of the Nature Recovery Strategy in Northern Ireland provides an opportunity for collaboration on nature restoration, recognising our shared international commitments under the Global Biodiversity Framework. While governance structures and policies may differ between jurisdictions, effective restoration requires shared ambition, coordinated monitoring, data sharing and cooperation to ensure that differences do not undermine ecological outcomes.

Recommendations: Elected representatives on both sides of the border should ensure that action is taken to address cross-border challenges such as:

- **Water quality initiatives** – particularly for shared river catchments and coastal areas
- **Invasive species management** – coordinating prevention and control efforts
- **Cross-border species restoration plans** – developing joint strategies for species such as Hen Harrier that span both jurisdictions
- **Landscape-scale habitat restoration** – supporting the restoration of connected habitats such as loughs, woodlands and nature corridors to improve biodiversity, climate resilience and ecosystem health.

A formal cross-border Nature Restoration Working Group should be established under the North-South Ministerial Council to coordinate these efforts, share best practice and develop joint plans.

Finance

Ireland has failed to adequately fund and resource nature conservation, directly contributing to the catastrophic decline of biodiversity and water quality. The 2021 Stout and Ó Cinnéide Strategic Review of the NPWS³ laid bare these systemic failings, documenting "*major strategic, structural, capacity and resource issues*" from decades of political neglect and chronic underfunding. It highlighted dedicated but overstretched staff unable to meet EU Nature Directives, national parks lacking dedicated management amid 3 million annual visitors, and an urgent need for investment on par with health or education to halt habitat losses and build research capacity.

This underinvestment has repeatedly resulted in successive Irish governments being hauled before the Court of Justice of the EU (CJEU) for breaches of Environmental Directives with fines totalling tens of millions of euros, squandering resources on legal defences that could have delivered compliance in the first instance. As of mid-2024, Ireland faced 9 active CJEU cases and 16 open infringements related to environmental issues⁴.

This chronic underfunding is all the more frustrating because when projects receive proper resourcing, as demonstrated by standout LIFE-funded initiatives like Burren Life and Corncrake LIFE, the results have been overwhelmingly positive for nature, farmers, and communities alike. These successes prove that well-funded, voluntary, results-based schemes deliver ecological gains alongside economic and social benefits, yet scaling them nationally remains stymied by the state's persistent failure to commit adequate long-term finance.

The big picture

Biodiversity loss poses severe economic risks, ranking second among the most severe long-term global risks (after extreme weather) in the World Economic Forum's Global Risks Report 2026⁵, with existential threats to supply chains, food security, and economic stability as ecosystems collapse, impacting over half of global GDP that moderately or highly depends on nature. Ireland's National Risk Assessment⁶ echoes this, framing biodiversity decline as a national security imperative tied to food supply shocks, water insecurity, reduced crop yields, and geopolitical tensions from critical ecosystem failures. These cascading risks underscore the urgent economic case for restoration investment.

³ Review of the NPWS 2021: Final report on the key findings and recommendations <https://irishriverproject.com/wp-content/uploads/2022/01/untitled-7.pdf>

⁴ <https://epawebapp.epa.ie/ebooks/soe2024/447/>

⁵ <https://www.weforum.org/publications/global-risks-report-2026/>

⁶ <https://www.gov.ie/en/department-of-the-taoiseach/policy-information/national-risk-assessment-2024-overview-of-strategic-risks/>

The economic risks of biodiversity loss and climate change are clear but so too is the business case for biodiversity conservation. According to the Commission the overall benefit/cost ratio of an effective global programme for the conservation of remaining wild nature worldwide is estimated to be at least 100 to 1⁷. The EU has recognised that natural capital investment, including restoration of carbon-rich habitats and climate friendly agriculture, is among the five most important fiscal recovery policies, which offer high economic multipliers and positive climate impact⁸. Within the EU the multiple benefits of the EU's Birds and Habitats Directives are worth, estimated at €200-300 billion per year, significantly exceed identified costs⁹.

The European Commission accompanied its NRR proposal with a twelve-part impact assessment that provides further detail on the costs and opportunities associated with the restoration targets¹⁰. Its assessment of the annual costs and benefits, as a share of GDP and per citizen, for nature restoration in each Member State clearly shows that the benefits far outweigh the costs. Of the 26 Member States assessed, Ireland ranks fifth overall in terms of benefits per citizen (in euros). This is supported by the draft NRP template which states that *“the available evidence indicates that the socio-economic benefits of ecosystem restoration substantially outweigh the costs.”*

Broken Funding Promises

Ireland's endorsement of the EU Nature Restoration Regulation came with firm government pledges for an adequately funded National Restoration Plan (NRP), emphasising to farmers in particular that actions would be voluntary, and remunerated with new funding in addition to CAP. The NECP 2021-2030 explicitly aligned NRP completion with the €3.15bn Infrastructure, Climate and Nature (ICN) Fund's 2026 launch, forecasting it as *“an important role in resourcing the measures in the Plan”* (p.61)¹¹. Yet the National Development Plan (NDP) betrayed these assurances, allocating not a cent from the ICN Fund or broader NDP to nature through to 2030, diverting the entire €3.15bn to transport, energy, and water infrastructure. This followed earlier expectations of €630m (20%) earmarked for farming and conservation sectors.

Imperative for Dedicated Long-Term Investment

Delivering an ambitious NRP is impossible without multi-annual, ringfenced funding commitments. While the final budget hinges on the specifics of the draft plan it is also impossible to plan ahead or indeed achieve restoration targets for 2030 without any allocated funding. In this regard the government has not been operating within a vacuum as Independent analysis already supplied by UCD provides high-level estimates: €107-124m

⁷ Balmford, A., Bruner, A., Cooper, P., Costanza, R., Farber, S., Green, R. E., ... & Turner, R. K. (2002). Economic reasons for conserving wild nature. *science*, 297(5583), 950-953.

⁸ Hepburn et al. (2020), Will COVID-19 fiscal recovery packages accelerate or retard progress on climate change?, Smith School Working Paper 20-02.

⁹ EC, 2016, 'Fitness check of the EU Nature Legislation (Birds and Habitats Directives)', Commission Staff Working Document (SWD(2016) 472 final)

¹⁰ Commission Staff Working Document Impact Assessment - Accompanying the proposal for a Regulation of the European Parliament and of the Council on nature restoration (Part 1/12)

https://environment.ec.europa.eu/publications/nature-restoration-law_en

¹¹ <https://assets.gov.ie/static/documents/irelands-integrated-national-energy-and-climate-plan-2021-2030.pdf>

annually for existing obligations (peatlands, freshwater, forests, coasts, marine, farmland), rising to €453.5-463.5m with NRR additions for the initial 30% targets. The draft Nature Restoration Plan indicates that restoring and re-establishing Ireland's degraded terrestrial, coastal, and freshwater ecosystems will require a present value investment of just under €5.8 billion between 2024 and 2050, including €2.0 billion for restoration works, €2.9 billion for maintenance and monitoring, and €0.8 billion for re-establishment. While scenario analysis shows total costs could range from €2.6 billion to €11.0 billion, the estimated present value of benefits is substantially higher at €32.9 billion, with ecosystem service benefits valued at €16.9 billion to €45.7 billion and carbon sequestration benefits estimated at €0.6 billion to €1.9 billion; overall, the analysis suggests that the plan would deliver strong net socio-economic gains alongside environmental recovery.

Recommendations:

The Environmental Pillar's are calling for:

- A dedicated ringfenced long-term budget at national level to deliver on the obligations of the NRP between now and 2050.
- NPWS budget increase plus sustained staffing growth.
- Substantial ICN Fund ringfencing for nature.
- Ringfence a proportion of the annual dividends of Coillte and Bord na Móna for reinvestment in nature restoration within the public landbank.
- Allocate 25% of the Maritime Area Consents (MAC) Levy to nature restoration projects in the marine environment.

NCI High-Level Recommendations

In 2024, the Irish Environmental Network (IEN) commissioned Natural Capital Ireland (NCI) to author *High-Level Recommendations for Funding Nature Restoration in Ireland*, diagnosing chronic underfunding, policy fragmentation, and disengagement as barriers to NRR and 4th National Biodiversity Action Plan (NBAP) goals amid collapsing ecosystems.

Recommendation: The Environmental Pillar fully endorses the NC *High-Level Recommendations for Funding Nature Restoration in Ireland*:

- **Overarching plan:** Forge a unified roadmap with rapid infrastructure reforms, empowering on-the-ground actors for evidence-based, long-term delivery.
- **Rebuild trust:** Harness political will to restore faith in schemes; enforce regulations; establish departmental accountability or an independent Nature Restoration Agency.
- **Mainstream biodiversity:** Embed restoration in public awareness with holistic biodiversity-climate messaging; train journalists for accurate crisis coverage.
- **Boost capacity:** Invest in staff, practical skills training, natural capital accounting, and integrated data/mapping systems.
- **Scale up success:** Expand pilots (e.g., Burren Programme, Corncrake LIFE) with sustained landowner support for NRR, Climate Action Plan, and Land Use Review.

- **Multi-annual funding:** Guarantee sustainable, monitored streams via a ringfenced Nature Restoration Fund; mainstream across EU MFF; prioritise NPWS capacity for co-creation.
- **Blended funding:** Mobilise private expertise/funds via fiscal tools like 0.5% corporate tax levy, profit levies, or Citizens' Green Bonds per Oireachtas recommendations.

Optimising EU MFF Expenditure

While new funds are essential, Ireland must maximise existing funding streams within the EU's Multi-financial Framework (MFF). The importance of the MFF is highlighted by the fact that the Common Agricultural Policy (CAP) dominates biodiversity spend in Ireland (75-80%, €1.5bn invested in ACRES). Other structural funds have not delivered enough for nature. For example the European Maritime, Fisheries and Aquaculture Fund (EMFAF) is supposed to fund marine conservation but has historically been almost exclusively focused on the seafood sector, while the limited conservation initiatives have focused on monitoring rather than management or restoration.

The Irish government holds the presidency of the Council of the European Union from July to December, 2026 at a time when draft NRP's will be submitted to the Commission and important decisions will be made on the next MFF 2028-2034. The Irish government should facilitate necessary discussions on the funding of nature restoration at an EU level including:

Recommendations:

- Supporting the creation of a dedicated ring-fenced fund for nature restoration at EU level.
- Supporting the continuation of the EU LIFE programme within the MFF.
- Supporting ringfencing of funding for nature / biodiversity within National and Regional Partnership Plans (NRPPs).
- Supporting the requirement that ringfencing for climate and environment within the NRPPs accurately reflects actual positive impact, rather than the status quo where expenditure labelled as climate and environment expenditure has no or little environmental impact is labelled as environmental expenditure.

Ireland should ensure that the financing requirements of the Nature Restoration Plan are explicitly reflected in the National and Regional Partnership Plan (NRPP) and in relevant sub-elements of the broader policy framework, including the next CAP Strategic Plan. In line with Article 22 of Regulation (EU) 2021/1060, which requires programmes to set out the main challenges, expected contributions of actions, and an indicative breakdown of resources, the NRPP should identify how the nature restoration plan will be funded, sequenced, and delivered across relevant public funding streams.

Recommendation: Ireland's NRPP should explicitly incorporate the financing needs of the Nature Restoration Plan and align them with relevant instruments, including the next CAP Strategic Plan, so that Ireland's restoration targets are backed by adequate, traceable, and cross-sector funding.

Under Article 21(7) the European Commission is required to provide the Parliament and Council with an overview of the available EU-level funds to fund the NRR. In the Commission's draft report they have provided the following recommendations which the Environmental Pillar support:

Recommendations:

- **Maximize EU funds:** Program all relevant 2021-2027 MFF envelopes (CAP, Cohesion, EMFAF, LIFE, Horizon Europe, InvestEU) explicitly for NRR targets; ensure allocated restoration funds (~€9.4B/year total public) are spent, not reallocated.
- **Boost national budgets:** Apply green budgeting; redirect EU ETS revenues and state aid to restoration; use environmental taxes/rebates for incentives.
- **Reform subsidies:** Identify/report harmful subsidies (per NRR Art. 15.3v and EHS guidance); repurpose to nature-positive activities, prioritizing vulnerable stakeholders like farmers.
- **Mobilize private finance:** Partner with EIB Group for de-risking/guarantees; leverage EU Taxonomy, Green Bonds, CSRD/CSDDD for investable restoration projects.
- **Deploy innovative tools:** In National Restoration Plans, promote PES schemes, high-integrity nature credits/certificates, blended finance, and philanthropy.
- **Align planning:** Embed restoration in National Restoration Plans with costed measures, funding maps, and coherence to climate/water/marine policies; prepare for 2028-2034 MFF integration.

Tackling Harmful subsidies

Tackling harmful subsidies is essential to deliver Ireland's NRP because public money should not continue to support activities that drive biodiversity loss, ecosystem degradation, or greenhouse gas emissions. In Ireland this is particularly relevant for fossil fuel supports, which still amounted to €4.67 billion in 2024, alongside other environmentally damaging expenditure, including measures with potential impacts on biodiversity. Redirecting these funds away from harmful subsidies and toward restoration, nature-friendly farming, and ecosystem repair would help align public spending with Ireland's legal obligations, improve value for money, and accelerate delivery of the Plan's biodiversity and climate objectives.

Ireland's NRP should explicitly commit to phasing out environmentally harmful subsidies at national level, in line with the NRR and the 8th Environment Action Programme. The Plan should identify and publish a time-bound roadmap to eliminate fossil fuel and other subsidies that negatively impact biodiversity and ecosystems, redirect those funds toward restoration, nature-friendly agriculture, and ecosystem repair, and integrate green budgeting, market-based instruments, and natural capital accounting to ensure public spending supports a socially fair transition to a restored, biodiverse Ireland.

Recommendation: Ireland's NRP should commit to phasing out environmentally harmful subsidies, publish a time-bound roadmap to eliminate fossil fuel and other biodiversity-damaging supports, and redirect those funds toward restoration and nature-friendly

agriculture, using green budgeting and natural capital accounting to ensure a socially fair transition.

Public Lands

One of the greatest opportunities for ambitious, large-scale nature restoration lies on public lands. Public lands managed by the State, local authorities, and semi-state bodies account for approximately 8–11% of land in Ireland. While this is small compared with the roughly 78% of land that is privately owned, private landowners must often balance nature restoration with the realities of making a living. On public lands, by contrast, the main constraints are political will and ambition. The State has a major opportunity to restore and re-establish habitats at scale, and meeting Ireland’s targets for woodlands, peatlands, and the rewetting of organic soils will be very difficult without using all suitable public lands. At a time when more is being asked of private landowners, it is essential that the State leads by example. Public land must be managed in the public interest, and the public should have a greater say in how that happens.

The untapped potential of Coillte, Bord na Móna, and the national parks system offers an unprecedented opportunity to restore nature at scale, while delivering ecosystem services such as biodiversity recovery, climate mitigation and adaptation, employment, and public amenity.

Coillte

- Coillte operates under an outdated mandate in the Forestry Act 1998, which requires it to carry on forestry and related activities on a commercial basis. Although government letters of expectation have encouraged greater management for nature and climate, they do not require ambitious restoration aligned with the NRR.
- Coillte is the largest landowner in the State, managing approximately 440,000 hectares, or 7% of Ireland’s land area. Around 364,000 hectares, or 84%, is forested, representing about half of Ireland’s forests. By comparison, the EU average for forests in public ownership is 40%. Coillte’s forests are dominated by non-native conifer plantations, which make up 73% of its estate.
- Coillte is also the largest owner of peatlands in Ireland. It estimates that 137,000 hectares of deep peat have been afforested, and approximately 37,000 hectares of deep peat are managed primarily for nature protection and biodiversity.
- Coillte also owns internationally important biodiversity sites, including about 96,000 hectares of protected sites such as SPAs and SACs. According to Coillte, 90,000 hectares, or about 20% of its estate, across more than 2,300 sites, have been identified and mapped as Bioclass sites.
- While Coillte has committed to increasing the area managed primarily for nature to 30%, this commitment does not appear aligned with the obligations of the NRR. Coillte also claimed in September 2025 that this target had already been met, raising

questions about what further contribution it intends to make to Ireland's legal restoration obligations.

Bord na Móna

- Bord na Móna was established under the Turf Development Acts 1946 and continues to operate under an outdated commercial mandate rooted in peat extraction and turf products. It has not clarified its current mandate from government by publishing its letters of expectation, though it now says its priority is renewable energy across its landbank.
- Bord na Móna owns approximately 80,000 hectares, or about 1% of Ireland's land area, spread across a network of around 130 bogs. Only a small proportion is semi-intact bog; much of the remainder is active industrial or post-industrial cutaway bog. Restoration could recreate a mosaic of raised bog, blanket bog, wetlands, grasslands, woodlands, and freshwater habitats across the estate.
- Bord na Móna is required under EPA licensing to rehabilitate sites after production and, under the Climate Action Plan, has committed to enhanced rehabilitation of 33,000 hectares of peatlands. However, this remains well below the 70,000 hectares of exploited peatlands that the EPA says must be rehabilitated if Ireland is to achieve net zero across agriculture and land use by 2050. Beyond existing rehabilitation commitments, Bord na Móna has not indicated any ambition to contribute to the NRP.

National Parks

- Ireland has eight national parks managed by the NPWS under the National Parks and Wildlife Act 1970. Together, they cover about 100,000 hectares, including one marine national park. Excluding the marine park, the seven terrestrial parks cover about 66,700 hectares, or 0.6% of the State's land area.
- The national park network includes some of Ireland's most iconic landscapes and internationally important protected sites, including Killarney, Glenveagh, the Burren, Connemara, the Wicklow Mountains, and the islands of Sceilg Mhichíl and the Blaskets.
- Despite their importance, national parks are not yet reaching their full potential. None operate under statutory-style management plans, and the NPWS remains under-resourced. More staffing and investment are needed to deliver park management, restoration, and visitor management. National parks should be the standard-bearers for landscape-scale nature restoration, yet the share of land managed primarily for nature conservation remains low by international standards.

Other Public Lands

Other public bodies manage high-nature-value lands that should be included in Ireland's NRP.

- The OPW manages 780 heritage sites, including Skellig Michael, the Great Blasket, Derrynane, Roundstone Bog, and Phoenix Park.
- The ESB owns lands in the Shannon Callows, the Gearagh, Poulaphouca Reservoir, Assaroe Lake, and Lough Nachung.
- Donegal County Council owns the Tawnawully Mountains, Galway County Council owns lands within the Connemara Bog Complex, and Kerry County Council owns Rossbeigh Strand.
- The Defence Forces own protected areas in the uplands, such as Glen of Imaal and Kilbride Camp, grasslands such as Curragh Camp, and coastal dunes such as Finner Camp.

Public Land Strategy

The current and previous governments have repeatedly said that nature restoration on public lands will be a cornerstone of the NRP. This is reiterated in the draft NRP which says that “*the NRP will, as far as possible, prioritise state-owned lands for meeting restoration targets.*” This commitment is welcome but as yet no tangible action has been taken to demonstrate that ambitious restoration will be delivered on public lands.

Recommendation: Announce a cross-departmental strategy for large-scale habitat restoration on public lands, including:

- A stocktake of public lands suitable for nature restoration.
- A transparent system for identifying restoration sites, especially cut-over and remnant bogs, afforested peatlands, and ancient and long-established woodlands.
- Measurable, time-bound targets for public bodies, aligned with the delivery of the National Nature Restoration Plan.

Reform Public Mandates

The environmentally damaging legacy of Coillte and Bord na Móna has been shaped in part by their commercial mandates. These must be reformed to reflect current societal expectations and Ireland’s biodiversity and climate commitments.

Recommendation: Reform the legal mandates, letters of expectation, and boards of Coillte and Bord na Móna by:

- Issuing new letters of expectation immediately, with specific obligations linked to the NRP.
- Appointing board members with the expertise needed to deliver nature restoration.
- Establishing a Cabinet subcommittee or high-level interdepartmental group to oversee reform.

- Embedding nature restoration objectives in the legal mandates of all State landholding and land managing bodies, including Coillte, Bord na Móna, local authorities, and the Office of Public Works.
- Redirecting a proportion of annual dividends from Coillte and Bord na Móna into a nature restoration fund for public lands.
- Requiring a transition from commercial to restoration and conservation management in publicly owned Natura 2000 sites and Natural Heritage Areas, including proposed NHAs.

Expand Protected Sites

Recommendation: Expand and properly resource publicly owned nature reserves and national parks.

- Explore further transfers of public land to the NPWS, similar to the creation of Wild Nephin National Park.
- Consider new national parks, including in the Midlands on Bord na Móna’s Moundillon and Blackwater Bog complexes.
- Expand public nature reserves and national parks through strategic acquisitions, such as the enlargement of Glen of the Downs.
- Create legal and operational mechanisms allowing the NPWS to manage important biodiversity areas held by other agencies.
- Provide sustained multi-annual funding for scientific planning, management, and monitoring.
- Strengthen field capacity across key disciplines, including rangers, foresters, hydrologists, and ecologists.

National Parks as centres of excellence

Recommendation: Ireland’s national parks should become flagship restoration landscapes and hubs of ecological connectivity and public engagement.

- Establish targeted programmes to restore and expand habitats in national parks.
- Develop “living laboratories” that demonstrate ecosystem recovery, support community involvement, and train the future green workforce.
- Integrate monitoring and education so that the parks become visible symbols of Ireland’s ecological renewal.

- Support farmers and private landowners adjacent to parks to manage land in ways that complement park objectives and strengthen connectivity. Consider greater use of the UNESCO Biosphere Reserve approach.
- Encourage the NPWS to work actively with NGOs and local communities in managing nature reserves.

Public Land for Nature

Other public bodies also manage land of high nature value, and these areas should be part of Ireland’s restoration effort. Every public body should dedicate part of its estate to biodiversity enhancement.

Recommendation:

- Introduce a “Public Land for Nature” initiative involving the OPW, ESB, IDA, HSE, local authorities, and others.
- Support actions such as pollinator zones, native planting, and the installation of swift bricks and nesting boxes on public buildings.
- Build nature literacy and professional skills across the public sector through biodiversity training and dedicated ecological roles in public bodies.

Civil Society's Role in Nature Restoration

Civil society across Ireland, from individual volunteers to established environmental networks, plays an indispensable role in protecting and restoring nature. Networks like the Environmental Pillar and Sustainable Water Network (SWAN) amplify this impact by coordinating dozens of environmental NGOs, channelling grassroots concerns to policymakers, and driving collective action on biodiversity, water quality, and habitat restoration. The NRP should look to empower local communities to be the best custodians of their own natural heritage.

Support environmental non-governmental organisations

Environmental NGOs and networks, including members of national coalitions such as the Environmental Pillar and the Sustainable Water Network, play a critical role in protecting and restoring nature. They provide essential platforms for ordinary citizens to engage in conservation and ensure that community perspectives are represented in decision-making processes. This role should be formally recognised and supported.

Recommendation: Targeted funding should be maintained and enhanced to support their work in environmental stewardship, monitoring, species and site protection, community initiatives, and advocacy, including the implementation of the NRR.

Promote and support citizen science

Citizen science plays a vital role in generating essential data on the state of Ireland's nature, including species populations, habitat health, and water quality; while strengthening public engagement with the protection and restoration of natural heritage within communities. These initiatives empower volunteers to contribute to long-term monitoring of wildlife through accessible platforms.

Recommendation: Continued and increased public funding should be provided to support citizen science initiatives through environmental NGOs, the National Biodiversity Data Centre and higher education institutions.

Empower communities in local natural heritage management

Communities play a vital role in actively managing their local natural heritage, providing place-based knowledge, sustained commitment, and innovative solutions to conservation challenges. Their involvement ensures protection and restoration efforts are inclusive, ecologically sound, and responsive to community priorities. Outstanding examples include the Community Wetlands Forum, Abbeyleix Boglands Project, and Ballydangan Bog Project.

Recommendation: Government should establish a dedicated Community Heritage Fund to provide sustained, multi-year grants for local groups managing natural heritage sites. Administered through local authorities and environmental NGOs, this funding would support capacity building, equipment, monitoring, and public awareness activities, complemented by a national Community Stewardship Awards scheme to formally recognise these vital contributions.

Support private landowners to restore nature

Private landowners who are not directly involved in commercial farming or forestry make up the vast majority of the population and own significant areas of land that could be used to restore nature. However, the lion's share of nature funding currently flows through CAP and is therefore not accessible to non-farmers. New funding mechanisms are needed to ensure that anyone who wishes to manage land for nature has the opportunity to do so. We therefore welcome the commitment in the Draft NRP that “*suitable incentives will be offered to private landowners to restore nature if they choose to do so.*”

Recommendation: New structural funds should be established to provide suitable incentives to private landowners to restore nature if they choose to do so.

Strengthen collaboration between public bodies and civil society

Public bodies such as the National Parks and Wildlife Service (NPWS) should deepen collaboration with environmental NGOs and community groups to actively manage and restore habitats, combining agency expertise with local knowledge and on-the-ground capacity. Successful models include the NPWS partnership with Rewilding Wicklow on

native woodland and peatland restoration in Wicklow Mountains National Park, and community-led initiatives like Abbeyleix Boglands where public agencies provide regulatory support while NGOs and locals execute restoration works.

Recommendations:

- Government should expand partnership and co-management models between the NPWS, local authorities, NGOs and community groups.
- Managers of public lands such as NPWS, Coillte and Bord na Mona should invest in more community outreach staff to proactively seek out collaborations with NGOs, community groups and private landowners.

Empowering Custodians

Farmers, fishermen¹², and foresters play a vital role as stewards of Ireland's diverse land- and seascapes, underpinning both our natural heritage and the social and economic fabric of rural and coastal communities. Their deep knowledge of local ecosystems and their ongoing management of these environments, position them as key actors in addressing the intertwined biodiversity and climate crises. However, these sectors are facing growing pressures from market volatility, rising input costs, structural change, and demographic shifts, with traditional livelihoods becoming increasingly precarious, particularly in marginal and high-nature-value areas.

In this context, nature restoration should not be seen as a new challenge for rural livelihoods but a new opportunity to empower and revitalise communities. Investment through environmental payments, such as well-designed agri-environment schemes and broader payments for ecosystem services, have a critical role to play in supporting the continued viability of farming, fishing, and forestry. By recognising and rewarding the delivery of public goods, these mechanisms can help bridge the gap between market returns and the true value of sustainable land and sea management, while also creating a range of opportunities for diversification. When appropriately resourced and designed, nature restoration can enable custodians to actively contribute to large-scale nature restoration while maintaining resilient, thriving communities. The economic and social cost of ecosystem collapse and climate breakdown alone is reason enough to restore the tapestry of life we are all part of.

Recommendation: Recognise the role of farmers, fishermen, and foresters as custodians of Ireland's land and sea by empowering them to lead nature restoration efforts. This requires ongoing support through existing funds and new funding to incentivise voluntary participation in restoration initiatives and schemes. To ensure lasting impact, funding mechanisms must

¹² We recognise the important contribution of fisherwomen in the sector and use the term 'fishermen' to reflect the views of the sector and the preferred terminology.

provide stable, long-term support, delivering nature restoration hand in hand with thriving rural livelihoods.

Empowering Farmers to Restore Nature

Farmers have shown time and again their willingness to lead on nature restoration when provided with the framework and financial support to do so. This commitment was reaffirmed in the joint recommendations of Ireland's Independent Advisory Committee (IAC) on Nature Restoration, whose membership included four farming representatives.

This farmer leadership is essential because land ownership in Ireland is dominated by farmland: 67% is private farmland and 7% is commonage, which is collectively farmed. Critically, 67% of Natura 2000 sites are privately owned, with the vast majority again being farmland. It simply isn't possible to restore nature in Ireland without strong leadership from farmers.

Yet while nature is in crisis, so is Irish farming. Ireland faces both a generational renewal crisis and a viability crisis. Despite a third of Irish farmers being over 65, the majority of farms have no successor in place. Many family farms are loss-making without subsidies, and even with public money, margins remain small, requiring many farmers to work second jobs off-farm. CAP payments for cattle and sheep farmers represent 129% of total income. Forty per cent of Irish farmers participate in ACRES not only because they want to save the planet for future generations, but because they want to have a farm to pass to the next generation. Agri-environmental schemes are among the best mechanisms we have to deliver public goods like biodiversity while ensuring family farms stay viable. Research in Ireland and France shows these schemes also enhance farmers' mental wellbeing through pride in environmental improvements and peer support.

The NRR represents a once-in-a-generation opportunity to secure a bright future for both nature and farming alike. Farmers will rise to this challenge when treated with respect and provided with voluntary schemes that enable sustainable land management while ensuring they can make a living.

The Common Agricultural Policy (CAP) on its own cannot provide the level of investment that is needed to empower farmers to lead from the front in restoring nature. This is particularly clear within the context of post 2027 CAP proposal where environment has been deprioritised, ringfencing for biodiversity expenditure has been removed and there is no coherence with the NRR. Clearly new ambition must be met with new and additional revenue streams in addition to traditional structural funds such as CAP.

Recommendations

- Provide farmers with new, additional funding outside CAP for the enhanced ambition needed to restore nature at scale across Irish farmland. A dedicated Nature Restoration Fund, should be established at both EU and Irish level to support voluntary farmer uptake without diluting CAP's environmental envelope.

- The Irish government should support the retention of the EU LIFE programme within the next EU Multi-Financial Framework. The EU LIFE Programme has been a critical innovation driver, exemplified by Burren LIFE's blueprint for locally led results-based agri-environmental scheme. Its loss would undermine innovation in agri-environmental measures at a time when a redoubling of investment and innovation is needed.
- Long-term custodianship by farmers requires long-term funding beyond what is currently available within existing CAP funding cycles. Funding must be ongoing and long-term, sustainable, scalable, with continuous monitoring and openly tracked progress.
- It is essential that farmers and rural communities are active collaborators in shaping and implementing nature restoration. Communities and landowners must be involved in decision making through early and sustained engagement. Wherever possible management interventions should look to deliver multiple environmental and social benefits and reward practitioners for the ecosystem services provided.
- Ireland must properly resource key agencies (NPWS, DAFM, Teagasc, and AKIS/EIP-AGRI) to provide the support farmers need to restore agricultural ecosystems.
- Authorities should provide clear guidance for farmers on the implications of different nature restoration measures for their eligibility for basic payments. The government's existing guidance on land eligibility should be updated so that where areas become ineligible and this is due to voluntary compliance with the NRR, these areas will continue to be eligible for payment. In particular land should not become ineligible due to the restoration of semi-natural habitats.

Empowering Fishermen to Restore Nature

The draft Nature Restoration Plan should recognise that the restoration of marine ecosystems cannot be achieved without addressing the main pressures caused by fishing, especially habitat degradation, seabed disturbance, bycatch, and greenhouse gas emissions from high-impact fishing practices. The plan should therefore include specific commitments to phase out destructive gear in restoration areas, strengthen spatial protections for vulnerable habitats, and use fisheries management as a tool to support marine recovery rather than undermine it.

The best way to achieve these goals in a just and equitable way is to empower Ireland's inshore fisheries and support the rapid transition toward low-impact, fuel-efficient fishing by incentivising gear and practices with lower environmental impact, and by prioritising fishing methods that reduce seabed damage and protected-species bycatch. It should also ensure that marine restoration measures are designed to protect food web integrity and carbon-rich seabed areas, not just individual species or stocks.

Article 17 of the Common Fisheries Policy should be used as a lever to support marine restoration by redistributing fishing opportunities toward low-impact fisheries. The proposal is to move away from allocation based mainly on historical catches and instead use transparent environmental criteria to reward fishing practices that reduce seabed damage, bycatch, and emissions, while strengthening incentives for ecosystem recovery and a fair transition to low-impact fleets.

Recommendations:

- The NRP should commit to the full and effective use of Article 17 to prioritise low-impact fishing vessels and phase out incentives that favour destructive fishing practices.
- It should require transparent, objective environmental criteria for allocation, including seabed impact, protected-species bycatch, food web integrity, and carbon emissions.
- It should ensure that fisheries management actively supports marine habitat restoration, rather than continuing to undermine it through high-impact fishing effort.
- The ongoing reform of fishing activities in Ireland’s inshore should seek to exclude fishing vessels over 18m in length from trawling inside the six nautical mile zone and baseline, delivering environmental and conservation benefit while also preserving and potentially increasing the social, economic and cultural positives of the inshore and island fishing sector and coastal communities around Ireland.
- A collaborative model of cocreation and co-management of marine protected areas to protect and restore marine ecosystems should be undertaken, ensuring that fishing communities are engaged throughout the process.
- EMFAF funds should be used to support fishermen in the transition to lower impact gears if current fishing methods are posing a threat to the protection and restoration of marine habitats and the species within.

Empowering Foresters to Restore Nature

The NRP should empower foresters by supporting a transition to a more diverse, close-to-nature and climate-resilient forestry model. This transition should create real opportunities for foresters by expanding rewilding, native woodland creation, agroforestry, and more trees in the landscape as nature-based solutions that deliver biodiversity, carbon, water, and resilience benefits.

Recommendations:

- The Plan should provide targeted support for foresters to move away from narrow, production-focused systems toward diverse, close-to-nature forestry that is better adapted to climate change.
- It should create incentives and advisory support for rewilding, native woodland expansion, and tree planting across farms and landscapes.

- It should ensure that foresters are active partners in delivering nature-based solutions, with fair access to funding, training, and long-term income opportunities tied to restoration outcomes.

No Backsliding on Environmental Protections

In 2015–2016, the European Commission conducted a comprehensive Fitness Check (REFIT) evaluation of the Birds and Habitats Directives. The unequivocal conclusion was that the Directives were “fit for purpose” and that the legal texts should not be reopened, as their core objectives remain highly relevant for halting biodiversity loss across the EU. The evaluation also highlighted that while the laws were highly relevant, their full potential was hindered by implementation gaps at Member State level, insufficient stakeholder involvement and a lack of adequate funding.

Member States’ failure to properly fund and implement nature laws remains the biggest issue. The NRR is explicitly designed to support and help implement key existing EU environment and nature laws, notably the Birds and Habitats Directives, the Water and Marine Strategy Directives, the Common Fisheries Policy, CAP rules and several sectoral and cross-cutting instruments.

The European Union’s ongoing deregulatory drive, labelled “simplification”, has already weakened the environmental framework within CAP. The proposed stress test of the Birds, Habitats and Water Framework Directives risks fundamentally undermining these key nature laws, as well as the NRR, at a time when greater ambition and better implementation are needed.

The Irish Government, particularly during the Irish EU Presidency, should not work to undermine existing nature laws and should instead work to strengthen implementation through an ambitious NRP, long-term financing and proactive stakeholder engagement.

Recommendation: No backsliding on environmental protections - Fully implement existing national and EU environmental legislation, recognising the NRR as part of a broader legal framework safeguarding ecosystems, climate, air and water. Reject any weakening of these protections under the guise of regulatory simplification.

Nature Restoration at the Heart of Climate Action

The world’s leading biodiversity and climate experts, including IPBES and IPCC, agree that the rapid decline of biodiversity and changes in climate are tightly intertwined: they share underlying direct and indirect drivers (land use change, pollution), they interact, and can have cascading and complex effects that impact people’s good quality of life and compromise societal goals. Indirect drivers of climate change and biodiversity decline include key institutional and governance structures in addition to socio-economic and cultural factors which drive consumption and energy use.

Climate change is impacting global biodiversity driving geographic range shifts, altering phenology and migration patterns and the availability of suitable habitat for species and disrupting key ecological interactions in communities. All of these factors have implications for the way ecological communities and ecosystems function, and thus their capacity to deliver nature's contributions to people.

The impact of climate change is projected to intensify in the coming decades adversely impacting genetic variability, species richness and populations, and ecosystems. In turn, loss of biodiversity through deforestation and the loss of peatlands and wetlands will increase emissions from the land use sector. Both climate change and biodiversity loss have the potential to exacerbate each other and conversely biodiversity and climate action offer intertwined solutions to this dual ecological crisis.

The NRR is grounded in the recognition that the biodiversity and climate crises are interconnected and must be addressed in tandem. The Regulation is explicitly designed to deliver dual benefits for both nature and climate. Restoration of ecosystems is identified as a key mechanism for achieving climate mitigation objectives, particularly through the protection and enhancement of natural carbon sinks such as peatlands, wetlands, forests and marine habitats. At the same time, healthy and biodiverse ecosystems are essential for strengthening resilience to climate impacts, including floods, droughts, wildfires and heatwaves. The Regulation therefore embeds climate adaptation within its core objectives, recognising that ecosystem-based approaches are among the most effective and cost-efficient tools available.

Central to this approach is the promotion of nature-based solutions. These are actions that work with natural processes to address societal challenges, delivering multiple co-benefits for biodiversity, climate, and human well-being. The Regulation highlights the role of nature-based solutions in enhancing carbon sequestration, reducing climate risks, and supporting ecosystem services, while also contributing to wider economic and social outcomes. For Ireland, the role of nature based solutions is clearly aligned with the Land Use Review which in particular highlighted the need for peatlands restoration, rewetting and reforestation.

Recommendations:

- Ireland's NRP should establish ecosystem restoration not only as a biodiversity objective, but as a central pillar of climate action.
- Nature restoration measures should be designed and implemented in a way that maximises climate co-benefits. This includes prioritising the restoration of high-carbon ecosystems such as peatlands, native woodlands and seagrass meadows, while also recognising the broader climate co-benefits and resilience of restored ecosystems.
- The NRP should contribute to strengthening the resilience of agricultural and forest systems, and the scaling up of nature-based solutions in both rural and urban environments.

- Decarbonisation of energy systems must recognise the interdependence of the climate and biodiversity crises by avoiding development in ecologically sensitive areas and by rigorously assessing, avoiding, mitigating and monitoring impacts on biodiversity throughout planning and implementation and restoring and offsetting any remaining impacts.

Cross Cutting Issues

Alien Invasive Species

Alien invasive species rank among the top pressures on protected habitats and species in Ireland, as detailed in the 2025 Article 17 report. They drive unfavourable status and deteriorating trends across key ecosystems like saltmarshes, dunes, woodlands, and fens/rivers.

Recommendations:

- Designate the proposed Invasive Species Bureau as the operational lead within the NPWS governance framework, responsible for delivering and reporting on a binding national IAS strategy with clear eradication, containment, and prevention targets, and for coordinating landscape-scale action across sectors, jurisdictions, and landholdings.
- National Invasive Species Strategy - The Bureau should be tasked with developing, implementing, and reporting on a binding national IAS strategy, including measurable eradication, containment, and prevention targets linked to restoration outcomes.
- Site-level control measures should be supported by Bureau-led landscape-scale programmes, recognising that effective IAS management often requires coordinated action across catchments, protected areas, and neighbouring landholdings.
- Support community-led invasive species management. Any National Invasive Species Strategy should recognise existing local action, provide dedicated funding for community-led work, and establish a central open-access repository of species-specific guidance and best practice. It should also include a clear framework to support and coordinate volunteers and local communities within an all-island approach.
- Integrate IAS control into priority restoration measures under the NRP, targeting key conservation issues such as Rhododendron in Oak Woodlands within National Parks, Himalayan balsam (*Impatiens glandulifera*), Common cord-grass (*Spartina anglica*), in saltmarshes; and Sea-buckthorn (*Hippophae rhamnoides*) invading sand dunes.
- Accelerate Eradication and Control - Develop site-specific management plans for priority invasives flagged in Article 17 (e.g., *Spartina anglica* in saltmarshes, Sea-buckthorn in dunes, Rhododendron in woodlands, Himalayan Balsam in fens). Prioritise early detection/rapid response in Natura 2000 sites via baseline surveys and periodic monitoring of hotspots.

- Launch public awareness campaigns for stakeholders (e.g., farmers, anglers, gardeners), emphasising good practices like "Check, Clean, Dry" for boats and gear.
- Early detection/rapid response - Mandatory surveillance, public reporting apps, and swift eradication funding for new outbreaks.
- Pathway regulation - Ban trade and sale of 14 high-risk plants; enforce soil and stone import controls; and regulate the horticulture trade and stop importing trees and shrubs for planting under the Irish Forestry Programme and CAP Strategic Plan.
- Strengthen risk assessment and listing processes. High-risk invasive species should be rapidly assessed for inclusion on the list of Species of National Concern, with interim restrictions introduced where feasible to limit their sale and release while assessments are completed.
- Landowner obligations - Require the removal of IAS under land eligibility rules on private farmland and support eradication with grants.
- Public body obligations - Require that public bodies like Coillte and Bord Na Mona put in place management plans to eradicate IAS on public land as well as adopting biosecurity measures to control the movement of IAS.

Wildlife Crime, Surveillance and Wildlife Rehabilitation

Ireland faces critical gaps in wildlife health surveillance, crime enforcement, and rehabilitation capacity that undermine biodiversity restoration efforts under the NRP. Addressing these issues is a key enabler to restore the populations of species.

Recommendations:

- Monitoring & knowledge systems - Include coordinated wildlife health surveillance and incident data as part of NRR monitoring and indicator frameworks. Ireland currently lacks structured wildlife health and mortality surveillance, which creates blind spots around disease, contaminants and emerging pressures that directly affect restoration outcomes.
- Enforcement & transparency - Recommend annual national wildlife crime reporting using existing agency datasets (NPWS, Gardaí, IFI, DAFM, Courts). This would improve transparency, enforcement targeting and accountability, and make restoration pressures measurable rather than anecdotal.
- Restoration delivery & incident response capacity - Flag the need for operational wildlife incident and response capacity, including pollution and disease events, as part of restoration delivery infrastructure. This aligns with the Department of Transport's call for a National Oiled Wildlife Response framework and supports resilience of restoration gains.

- Restoration treatment & rehabilitation infrastructure - Recognise the role of specialised wildlife treatment and rehabilitation infrastructure, such as a Wildlife Teaching Hospital, in supporting species recovery, incident response, surveillance and post-release outcomes.

Rewilding

Ireland's NRP is an opportunity to scale up nature restoration by working with natural processes rather than relying only on intensive intervention. Rewilding can play a key role in this by restoring degraded peatlands, river floodplains, native woodlands, and degraded marine habitats, while also supporting biodiversity recovery, climate mitigation, and rural resilience.

Rewilding is essentially about unleashing the potential of natural processes to allow nature to restore and sustain ecosystems itself. This can mean both active rewilding where natural processes are reinstated to allow nature decide the outcome or passive rewilding where natural processes are already in effect, creating novel ecosystems. For habitats such as native woodlands, existing approaches will not be sufficient to restore and re-establish these habitats at the scale required, or to secure the continued improvement and non-deterioration of restored sites. In the case of highly degraded wetlands such as cutover bogs, rewilding presents a low cost and ecologically quick approach to deliver diverse, ecological mosaics that support an array of ecosystem services. Addressing the underlying pressures that prevent habitats from reaching favourable conservation status and allowing them to re-establish themselves is therefore the most cost-effective and ecologically coherent way to proceed. Glenveagh National Park's 100-year Woodland Management Strategy shows how this approach can be applied in practice to restore and expand native habitats at scale in our uplands.

Rewilding offers a new and ambitious way forward for nature where the end point of a project is not the main priority, allowing resilient and robust habitats to develop themselves that are more resistant to increasing anthropogenic and climate impacts.

Recommendations:

- Mainstream rewilding as a delivery tool - Recognise rewilding as a practical and potentially low cost mechanism for meeting restoration targets in a reduced timeframe where natural regeneration and low-intervention management are appropriate.
- Demystify rewilding - Using public lands create best practice examples of how natural processes can be restored in ways that benefit nature and communities and show pioneering and ambitious rewilding efforts.
- Link rewilding to rural regeneration - Highlight best practice examples where rewilding is delivering local employment, ecosystem services, and nature-based tourism where communities benefit directly.

- Strict protection - The EU Biodiversity Strategy for 2030 sets out a commitment to legally protect a minimum of 30 % of the land and sea, of which at least one third should be under strict protection, including all remaining primary and old-growth forests. The NRP and associated Nature Restoration Strategy should explicitly address how this strict protection obligation will be achieved.
- Ensure that at least a proportion of strictly protected sites are designed to meet the standard of Wilderness areas, defined by the U.S. Wilderness Act as "*an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain.*"
- Establish a task force to assess the feasibility of reintroducing lost flora and fauna species to Ireland and to proactively develop strategies to prevent the local extirpation of species in the future, drawing on international best practice, including the listing petition and status review process under Section 4 of the U.S. Endangered Species Act.

Professional Capacity for Nature Restoration

Ireland has a knowledge and professional skills gap that must be addressed at pace to meet the scale and urgency of work ahead. Closing these gaps now will support the successful implementation of the NRR and deliver wider benefits for the economy and communities.

Recommendations:

- Survey state, semi-state, academic and industry organisations involved in nature restoration to see what issues they currently face, where professional and administrative gaps lie, where bureaucratic and legislative roadblocks occur and what they would ideally like to see changed. Address the key issues identified.
- Reform of NPWS to have distinguished roles between rangers to have appropriately skilled people working in their areas of interest - ensure that rangers working in ecologically focused areas are in continuous improvement training to stay up to date with advances in science, technology and best-practice
- Reform of NPWS to have a more central ecological focus in all its work and ensure that management personnel are appropriately trained in ecology.
- Grant powers to NPWS to enforce rules within national parks or state owned land.
- Ensure the NPWS is better resourced to implement wildlife legislation and bring proceedings in wildlife crime cases by increasing staff capacity and strengthening the training and resourcing of An Garda Síochána and the courts system.
- Increase funding for NPWS to hire appropriate number of ecologists

- More liaisons between state and eNGOs to develop best practice for nature restoration efforts
- More ecological staff with all state bodies such as local authorities and more to ensure that nature becomes more central in all decision making processes and that there are individuals who understand nature making decisions
- More funding for academia to promote both practical and bluesky ecological restoration research in Ireland to further nature restoration and make Ireland a world leader in Ecological Research
- Review of licencing system in Ireland - ensure that it is adequately staffed and funded and review of systems worldwide to see what may suit Ireland best - i.e. UK system of individual authorisation and licencing as opposed to current project licencing in Ireland
- Review of education systems in Ireland to ensure everyone has fair access to learning about nature and reducing barriers to working in the field.
- Address basic botanical and ecological field skills shortages with wider availability and promotion of botanical and ecological field skills courses at third level institutions across Ireland.

Key Restoration Articles

Land: Art 4

Article 4 is a central provision of the NRR, as it sets incremental targets and timelines for the restoration and re-establishment of terrestrial, coastal, and freshwater ecosystems. It requires additional habitat restoration for protected species, mandates improved habitat connectivity, and subjects restoration measures to continuous improvement and non-deterioration obligations.

According to the NPWS's 2025 Article 17 report, the main pressures/threats to Ireland's protected Annex I habitats remain agriculture and other land uses such as extraction of resources, forestry, urbanisation, recreation, and invasive species. Agriculture remains the greatest pressure/threat impacting 69% of Ireland's EU-protected (annex I) habitats, with High importance for over 50. Intensive grazing/overgrazing (41% of habitats), drainage (29%), and agricultural pollution (27%) dominate. Undergrazing / abandonment also affects 27% of habitats, demonstrating the complex role that diverse changes in agricultural practices continue to play in biodiversity collapse. These agricultural pressures are particularly acute for peatlands and semi-natural habitats.

Alien and problematic species now rank as the second most frequent pressure (51% of habitats, High in 24%), ahead of development/construction/recreation (44%), reflecting the ongoing impact of globalisation, trade and alien invasive species spread (e.g., *Rhododendron* in woodlands, *Spartina* in saltmarshes). The impact of recreation also illustrates the increasing demands we are placing on our remaining wild spaces and that even recreational activities can negatively impact on habitats if they aren't managed properly

For Ireland's water environment, agriculture is again paramount, with nutrient run-off, sediment, pesticides, and drainage causing eutrophication, hydromorphological damage, and declines in high-quality rivers/lakes (e.g., Hard-water lakes 3140 at Bad status). Post-dairy quota intensification has worsened pollution, particularly in the south/southeast. Reduced stocking rates, continued investment in wastewater, plus nature-based solutions like habitat buffers from farmland/forestry, are essential for both terrestrial and freshwater recovery.

Ireland's forestry remains intensively plantation-based (85% plantations, >60% non-native conifers like Sitka spruce), atypical in Europe where semi-natural forests prevail. This model harms peatlands, grasslands, wetlands, coastal habitats, and water quality via acidification, sedimentation, and nutrient leaching. 450,940 ha of peatlands have been inappropriately afforested, including by State bodies such as Coillte. Even protected Natura 2000 sites such as the six Hen Harrier SPAs have been heavily afforested (53% forest cover), resulting in a 54% population decline within the SPAs since 2007. Poor regulation and the failure of the state to carry out urgent habitat restoration has perpetuated the legacy issues in the sector.

Global assessment of wetland loss suggests that Ireland has lost more wetlands than any other country, with estimates indicating up to 90% loss since 1700. This and ongoing loss of wetland is a major driver in the collapsing populations of once common waders like Curlew, Lapwing and Redshank. Peat soils cover 24% of Ireland (1.7Mha) with our peatlands hosting globally threatened Active Raised Bogs, Blanket Bogs, and Heaths, but 92% of raised bogs remain degraded (<4% actively peat-forming), worsened by ongoing industrial/domestic cutting and drainage.

Unsustainable land use change and in particular changes in agricultural land have reshaped habitats through intensification, land drainage, reseeding and simplification of landscapes, reducing habitat diversity and connectivity. To deliver habitat restoration and re-establishment at scale we must reshape our relationship with the land and our broken food and forestry systems to reverse biodiversity loss and improve livelihoods for farmers and foresters. Many threatened habitats and species remain dependent on farming for their survival and therefore, in many instances, it's a case of supporting the right kinds of farming and space for nature on farms. Lasting change will require more than just a Nature Restoration Plan but a reform of the Common Agricultural Policy and other national and EU policy frameworks.

Legal interpretation of Art 4(1) and Art 4(4)

Article 4(1) of the NRR mandates Member States to implement restoration measures on at least 30% of the total area of Annex I habitat types (terrestrial, coastal, and freshwater ecosystems) not in good condition by 2030, increasing to 60% by 2040 and 90% by 2050.

These measures aim to improve habitat condition to progressively achieve good condition across protected habitats.

Article 4(4) requires restoration measures on areas representing at least 30% of the additional surface needed by 2030, 60% by 2040, and 100% by 2050 to reach the Favourable Reference Area (FRA) for each relevant habitat group listed in Annex I. This targets re-establishment where habitats have been lost or fallen below their reference range, expanding and reconnecting them.

Together, these provisions directly tackle the implementation gap under the Habitats Directive (92/43/EEC), by setting incremental, time-bound area-based targets, Articles 4(1) and 4(4) drive measurable progress toward restoring habitats to Favourable Conservation Status (FCS).

Misinterpretation of Habitat Groups approach

Within Article 4 (1) Annex I habitats are described as Habitat Types, relevant groupings of which are sub-divided into Habitat Groups (e.g. Wetlands, Grasslands, Forests). Given the tight timelines involved to 2030 flexibility is given to achieve habitat restoration targets by applying those targets at a Habitat Group level rather than at every Habitat Type. Member States can use this flexibility to prioritize restoration efforts to 2030.

Unfortunately, the lack of precision within the formulation of Art 4(1)(b) means that it could be misinterpreted as allowing this Habitat Groups approach to be utilised beyond 2030. This is not the case, however, as Member States do not have the flexibility to avoid having to reach Favourable Conservation Status (FCS), or the need to have in place restoration measures on at least **90% of each Annex I habitat type** that is not in good condition by 2050.

While habitat groups might inform initial prioritisation, the text's reference to "area of each group of habitat types" cannot justify offsetting over restoring one habitat to compensate for neglecting another. This strict per-habitat application is essential to achieve FCS for every type, as aggregation would dilute biodiversity goals and evade binding targets.

Article 4(4) is Strictly Habitat Type Specific

Article 4(4)'s re-establishment targets for Favourable Reference Area (FRA) explicitly apply to "each group of habitat types listed in Annex I," with no textual or recital-based support for broader grouping. Unlike Article 4(1), it lacks even ambiguous phrasing allowing flexibility, making aggregation legally untenable. NRP's must target individual habitats to meet 2030, 2040, and 2050 milestones without conflating distinct types.

The NRR complements / Not replaces the Habitats Directive

The Regulation builds on Directives 92/43/EEC and 2009/147/EC. Articles 4(1) and 4(4) drive progress toward FRA and FCS per habitat (Recitals 24-36 emphasise this linkage, e.g., Recital 28 on re-establishing to FRA "until... favourable conservation status... is reached"). Interpreting the overall legal targets as aggregated to Habitat Group level would contradict pre-existing obligations, effectively amending the Habitats Directive without legislative basis, something Recital 27 and the Regulation's intent explicitly rejects.

Note: The draft NRP template seems to imply that the Art 4(1) targets can be based on the total cumulative area of habitat types ‘not in good condition (6.1.2.2.), and that the Art 4(4) target can be based on the total cumulative area to be re-established to reach favourable reference areas (6.1.2.4.). As outlined above this would imply that the legal requirement to restore FCS for each Annex I habitat type no longer exists and this is clearly not the case.

Recommendations:

- The NRP must clearly outline how the incremental targets for each habitat type will be achieved in order to achieve the overarching targets of achieving Favourable Reference Area (FRA) and Favourable Conservation Status (FCS) for all Annex I habitat types by 2050.
- The utilisation of Habitat Groups to achieve the Art 4(1) targets to 2030 should not jeopardise the achievement of achievement of the Art 4(1) and Art 4(4) targets for 2050 on a habitat type by habitat type basis, or the ultimate achievement of FCS for all Annex I habitats.

On the Calculation of Favourable Reference Area (FRA)

Article 4(4) requires habitat re-establishment in order to achieve Favourable Reference Area (FRA) for each Annex I habitat type, directly supporting the achievement of Favourable Conservation Status (FCS).

Current NPWS FRA values, often based solely on the effective implementation date of the Habitats Directive (1994 baseline) or later baseline surveys, underestimate FRA by ignoring:

- Pre-1994 historical losses from agricultural intensification, drainage, afforestation, and land-use change.
- Post-1994 declines between Habitats Directive implementation (1994) and baseline survey dates.
- The European Commission's guidance on the need to take into account historical losses and ecological function. The guidance also requires precautionary FRA beyond 1994, using all evidence including 1940s-1990s trends, species dependencies, and ecological potential.

In addition:

- NRR Article 14(2) goes beyond the existing guidance and mandates incorporating historical distribution records and climate projections into the calculation of FRA.

The practical impact of underestimating FRA in Ireland’s Art 17 reporting is evident for example, in the case of Ireland Annex I grasslands. The combined FRA targets for Ireland's five Annex I grassland habitats total just 3.43 km², minuscule relative to their former extent

and the well accepted pre and post 1994 declines, and ongoing losses and homogenisation documented in surveys.

For a range of Annex I habitats many 2025 FRA values are also lower in the 2025 Art 17 report than the 2019 figures (e.g., Old sessile oak woods, alluvial forests), lacking transparent justification.

Recommendations: Robust, transparent FRA calculation is foundational for NRR compliance, Habitats Directive delivery, and scaled restoration to reverse biodiversity loss.

- Reassess FRAs, taking into account the Commission's guidance, the requirements of Art 14(2), based on comprehensive evidence from historical datasets, ecological needs and expert opinion.
- Apply precautionary principle for fragmented/declining habitats (grasslands, woodlands, heaths), ensuring FRA supports connectivity (Art 4(10)), species recovery (Art 4(7)), and climate adaptation.
- Fully document methodological changes since 2019 Article 17, explaining FRA reductions with data, assumptions, and ecological rationale.

Achieving Favourable Conservation Status

Ireland's current approach to the establishment of conservation objectives remains legally and scientifically incomplete because it starts from site-specific conservation objectives (SSCOs) rather than from the higher-level duty to restore protected habitats and species to Favourable Conservation Status (FCS). SSCO's are only a subset of the conservation measures needed to deliver FCS, and they should be derived from Favourable Reference Values (FRV) at population, national, and where relevant biogeographical scale, not used as a narrow proxy for those obligations. In the case of the Hen Harrier, the current NPWS approach has focused narrowly on the six SPAs and on recent survey data, even though the Nature Directives require a broader assessment of historical range, population viability, habitat restoration potential, and the role of the species across its natural range.

This approach is reiterated in Ireland's draft NRP which states that SSCO's "*define favourable conservation condition at site level by setting targets for relevant attributes for the habitat or species in question. This type of process can also be established outside Natura 2000 sites, using the appropriate attributes for the habitat in question. Such assessments will support national monitoring programmes undertaken for national reporting.*"

This approach does not adequately connect site targets such as breeding pairs or productivity thresholds to the achievement of FCS, and relying on SSCO's alone risks entrenching the status quo rather than setting the restoration ambition required by EU law.

Recommendation: Ireland should adopt FRVs and FCS as the foundation for nature restoration, with SSCOs designed only as tools to deliver those objectives, alongside explicit restoration targets for habitats and population recovery within and outside Natura 2000.

On the use of derogations

Within Art 4 a number of derogations are afforded to Member States. The first of Ireland's multi-stakeholder consultation events, the 'Leaders Forum' took place in April 2025. A key recommendation of that forum was that the Irish NRP should be ambitious and inspirational and that the use of derogations should be avoided:

Ambitious and Inspirational: *The plan should be as ambitious as possible, inspiring and motivating collective action across all sectors while committing to no further deterioration of nature. It must achieve 100% implementation with full commitment ...avoiding derogations (emphasis added).*

We note that the draft National Restoration Plan proposes to invoke the derogation under Article 4(5) to reduce the level of ambition set out under Article 4(4) in relation to habitat type 91A0 (Old sessile oak woods). We reiterate that, based on consultation with the Leaders' Forum, there is no public support for the use of derogations.

The justification given for the invocation of the derogation is “*high levels of habitat fragmentation and historic deforestation the...lack of suitability mapping...and current low afforestation rates, capacity and consent constraints in the forestry and ecological sectors, it is doubtful that Ireland could reach the 91A0 re-establishment target within the set timeframe.*”

Habitat fragmentation is not a barrier to re-establishment given that Old sessile oak woodlands represent the natural ecological climax community across a substantial proportion of the country. There is significant potential to restore this habitat at scale, particularly where key pressures such as overgrazing and burning are effectively addressed. Opportunities for restoration include both upland areas and lands within public ownership.

On the lack of mapping, the Environmental Pillar has previously offered to share GIS mapping and associated data with the NPWS to support the identification of suitable sites on, and adjacent to, public lands for the restoration of this habitat. While this offer of engagement has not been taken up to date, it remains open and available to support the development of the NRP in relation to Old sessile oak woodlands.

The current adhoc piecemeal afforestation of private landholdings within the Forestry Programme is clearly not sufficient to restore native woodlands at scale or in an ecologically coherent way. New approaches are needed focusing on landscape scale restoration on public lands and in our uplands in collaboration with landowners and communities.

Recommendation: In line with the wishes of the 'Leaders Forum' the NRP should be as ambitious as possible, inspiring and motivating collective action across all sectors while

committing to no further deterioration of nature. It must achieve 100% implementation with full commitment, avoiding derogations.

Art 4(2) provides a derogation which allows Member States to reduce the level of ambition for the Art 4(1)(a) and (b) restoration targets, however the derogation only allows the exclusion from the relevant group of habitat types very common and widespread habitat types that cover more than 3 % of their European territory.

Ireland's European territory, as defined under EU law, encompasses both its terrestrial land area and its extensive marine territory (over 400,000 km² within 12 nautical miles, plus exclusive economic zone waters totalling ~880,000 km²). Given that marine habitats dominate this total surface area no terrestrial Annex I habitat type meets the 3% cover threshold. Therefore, Ireland cannot apply this derogation.

Note: We welcome that the draft NRP template indicates that Ireland has not applied for a derogation under Art 4(2).

Recommendation: Article 4(2)'s derogation cannot be applied to Ireland's terrestrial habitats, as none meet the "very common and widespread" threshold relative to total European territory.

Habitat restoration for species and habitat connectivity

Ireland's NRP must address both habitat restoration /re-establishment under Articles 4(1) and 4(4), and the additional species-focused obligations under Article 4(7), which requires Member States to restore habitats of species listed in Annexes II, IV and V of Directive 92/43/EEC and of wild birds under Directive 2009/147/EC. These measures go beyond habitat restoration to ensure sufficient quality and quantity of species habitats, including re-establishment and enhanced connectivity, as reinforced by Article 4(10). While site selection for habitat restoration should be based on both the needs of habitats themselves and protected species, Article 4(7) mandates **additional** restoration outside these core areas in line with achieving Favourable Conservation Status (FCS) for species and to deliver landscape-scale connectivity.

The draft NRP does not clearly explain how these additional habitat restoration targets will be calculated based on the conservation needs of the species. Simply identifying the overlap between the distribution of species requiring habitat restoration and the areas to be restored under Art 4(1) / Art 4(4) is not sufficient.

Recommendations:

- When identifying habitat for restoration / re-establishment consideration should be given to the conservation needs of protected species. For example the selection of

blanket bogs for restoration should take into account important Hen harrier breeding habitat and likewise the restoration of Native Woodland should take into account the needs of protected species like Lesser Horseshoe bat (*Rhinolophus hipposideros*) and rare species like Pied Flycatcher (*Ficedula hypoleuca*).

- Identify and restore additional habitats under Article 4(7) to bring species into Favourable Conservation Status, using Important Bird and Biodiversity Areas, species distribution records, and other spatial data to target areas that support Annex II, IV and V species and wild birds whose habitat needs extend beyond the protected site network.
- Enhance connectivity explicitly under Articles 4(7) and 4(10) by restoring ecological corridors, riparian zones, hedgerow networks, and stepping-stone habitats that link protected sites and support species dispersal, ensuring the functionality of wider ecosystems.
- According to Ireland's 2025 Art 17 report two Maërl species (*Lithothamnium coralloides*), and *Phymatholithon calcareum*) are in bad conservation status and should therefore be included in the list of species subject to Art 4(7).

Restoring wetlands and freshwater habitats

The vast majority of Annex II species listed in the Habitats Directive that come into the scope of Art 4(7) are dependent on freshwater habitats, while at least sixteen of the bird species that come into the scope of Art 4(7) are associated with freshwater habitats. There are also a number of Irish habitat types within Group 3: River, lake, alluvial and riparian habitats, that fall within the scope of Article 4. Therefore in order to meet the obligations of Art 4 Ireland's NRP should have a dedicated suite of actions targeting the main threats and pressures facing wetlands and in particular freshwater habitats and species.

Wetland restoration should focus on the common pressures identified in the Art 17 report for freshwater species. These actions should be delivered at catchment scale, and complemented by species-specific measures.

Recommendations by common pressures on freshwater species:

- **Improve water quality across freshwater catchments** - As water quality is a recurring pressure across the freshwater species the NRP should prioritise reducing nutrient, sediment, and pollutant loading from agriculture, wastewater, and other diffuse sources. This should be framed at catchment scale, not only at protected site scale, so that upstream activities are addressed alongside habitat restoration.

Important for Freshwater pearl mussel (*Margaritifera margaritifera*), Atlantic salmon (*Salmo salar*), Pollan (*Coregonus pollan*), Slender naiad (*Najas flexilis*).
- **Restore natural hydromorphology and flow regimes** - The NRP should protect and restore hydromorphology of rivers including by tackling drainage, abstraction, and

other alterations to water movement. This is especially important where species depend on clean, stable, or seasonally dynamic water conditions.

- **Reconnect rivers and remove barriers** - For migratory freshwater species, the NRP should prioritise barrier removal, fish passage, and longitudinal connectivity. Connectivity measures should be prioritised for the most important sites for migratory species, linking spawning, nursery, and adult habitats. Actions delivered under Art 9 should be linked to the Art 4(7) and Art 4(10) requirements for Annex II species.

Important for River lamprey (*Lampetra fluviatilis*), Sea lamprey (*Petromyzon marinus*), Twaite shad (*Alosa fallax*), and Atlantic salmon (*Salmo salar*).

- **Restore and protect habitat structure** - Riparian zones, riverbeds, lake margins, flushes, and temporary wetlands should be restored and protected where habitat degradation is limiting species recovery. Habitat restoration should also address sedimentation, channel modification, and loss of open wet habitat.
- **Build in biosecurity and invasive-species control** - Where species are vulnerable to invasive species or disease, restoration actions must include biosecurity safeguards and targeted control measures. This should be treated as a core implementation requirement rather than an add-on.

Important for White-clawed crayfish (*Austropotamobius pallipes*).

Prioritising the most suitable areas for restoration

Sites should be selected based on sound and transparent ecological criteria: According to Art 4(8) – “The determination of the most suitable areas for restoration measures...shall be based on the **best available knowledge and the latest scientific evidence** of the condition of the habitat types listed in Annex I to this Regulation, measured by the structure and functions which are necessary for their long-term maintenance, including their typical species, ...and of the quality and quantity of the habitats of the species referred to in paragraph 7 of this Article.”

There are many relevant biodiversity datasets that should be considered when evaluating the best available knowledge and the latest scientific evidence including national datasets such as: Important Bird and Biodiversity Areas (IBAs), Ancient and Long-Established Woodlands, Irish Peat Soil Map, Art 17 mapping, Irish Semi-Natural Grassland Survey, Wetlands Survey, RAMSAR, Flora Protection Order.

There are also a number of important citizen science data sets that should be considered including monitoring by the National Biodiversity Data Centre, BirdWatch Ireland, Coast Watch Europe and the Hen Harrier Winter Survey.

Recommendation: The selection of sites for habitat restoration and re-establishment must be based on sound ecological criteria, constituting the best available knowledge and the latest scientific advice. This criteria should be made publicly available and there should be transparency around how specific sites were selected.

Prioritise the existing network of protected sites for restoration

While restoration beyond existing protected network will be necessary to achieve wider ecosystem recovery, focusing initial efforts within the network provides an efficient, ecologically sound and legally consistent foundation for meeting Ireland's obligations.

Prioritising Natura 2000 sites for restoration

Ireland's NRP should prioritise Natura 2000 sites when selecting areas for habitat restoration under Article 4(1). The Regulation explicitly encourages such prioritisation until 2030 (Art 4(1)(b)) and, as reflected in the preamble, recognises the essential role of Natura 2000 sites, particularly where habitats are not in good condition and where legal frameworks already support the long-term effectiveness of restoration measures.

Natura 2000 sites were designated using robust ecological criteria and the best available scientific evidence, aligning with Article 4(8). Prioritising these sites therefore ensures a scientifically grounded and coherent approach to restoration planning.

Recommendation: Prioritise Natura 2000 sites when selecting sites for initial habitat restoration.

Prioritising Natural Heritage Areas (NHA) for restoration

Prioritise Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) for habitat restoration under Article 4(1), as these sites were designated under the Wildlife Acts on the basis of their ecological value, including the presence of habitats, species, and geological features of national importance, identified using the best available scientific evidence. As such, their inclusion aligns with Article 4(8), which requires the selection of the most appropriate areas for restoration.

Recommendation:

- Ireland's NRP should prioritise Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) for habitat restoration under Article 4(1).
- In order to support the restoration of all protected sites the full designation of proposed Natural Heritage Areas (pNHAs) should be finalised, prioritising those sites that do not also have SAC / SPA designation. All NHAs should have site specific conservation objectives, site synopses and in time management plans.

Taking into account the need to achieve legal obligations

For some habitat types the size of the restoration and re-establishment targets mean that it will be necessary to implement timely and sustained restoration measures in order to achieve the 2050 targets. In particular the habitat re-establishment targets for numerous peatlands and native woodland habitat types will require ambitious landscape level habitat restoration that will require urgent interventions to 2030 and sustained efforts to 2050 and beyond.

Recommendation: Ambitious habitat restoration and re-establishment targets for certain habitat types will necessitate the implementation of timely and sustained restoration measures in order to achieve the 2050 targets.

Prioritising habitats of threatened species

In identifying the most suitable areas for restoration and re-establishment, priority should be given to habitats supporting species that are in need of urgent intervention due to their threatened, declining or rare, conservation status, using the IUCN Red List and Irish regional Red Lists as a prioritisation framework. This should include species assessed as threatened at global, European or national level, and should be combined with data on species distribution, ecological requirements, and connectivity needs, so that restoration delivers maximum benefit for biodiversity recovery and risk reduction.

Recommendation: Prioritise habitats supporting species that are in need of urgent intervention due to their threatened, declining or rare, conservation status.

Prioritising sites by restoration potential

Where appropriate, sites should be selected for habitat restoration and re-establishment based on their future biodiversity potential rather than solely their current conservation status. This includes degraded areas such as cut-over bogs and plantation forestry sites, which, despite low current biodiversity value, offer high restoration potential through support for Annex I habitats, large-scale habitat creation, enhanced connectivity, and improved quality/quantity of species habitats. These sites often represent socio-economic "low-hanging fruit" with feasible restoration pathways.

Recommendation: Where appropriate, select sites based on future biodiversity potential rather than solely current status.

Prioritise the restoration of large areas of interconnected habitat

Conservation science consistently shows that large, high-quality, and well-connected habitat areas support greater biodiversity, lower extinction risk, enhanced gene flow, and increased ecological resilience. Most land in Ireland consists of small, often dispersed parcels under private freehold ownership. This makes ambitious landscape level nature restoration challenging, particularly for habitats such as native woodlands which usually require a permanent change in land use from farmland to woodland. Where possible an effort should be made to strategically work with public and private landowners who own large areas of suitable habitat or landowners who collectively manage lands such as commonages. In the public realm this would include bodies like Coillte and Bord Na Móna, while in the private realm opportunities may exist to work with owners of large estates, hill and commonage farmers.

Recommendation: The State should systematically identify public and private landowners holding extensive tracts of suitable habitat, enabling coordinated landscape-level restoration that delivers large, well-connected areas of high-quality habitat.

Investing in robust monitoring and reporting

The NRP must incorporate robust monitoring and reporting under Articles 4(9) and 4(11) to ensure compliance with restoration targets, continuous improvement in habitat condition, and prevention of deterioration.

Enhanced investment is essential to close knowledge gaps on habitat condition, track restoration effectiveness, and support adaptive management, as required under Article 20's electronic database and GIS-based monitoring systems.

Current bilateral engagement between State, academia and civil society on habitat monitoring is mixed, highlighting the need for early, sustained collaboration on data collection and exchange.

We are supportive of the draft NRPs conclusion that a contemporary comprehensive national habitat map that indicates Annex I habitats and their condition, is required, including the need for improved recording of baseline condition and the use of new technologies, such as remote sensing and machine learning.

Recommendations

- Establish a dedicated monitoring programme to map habitat condition for 90% of Annex I habitats, integrating Article 17 Habitats Directive data, remote sensing (Copernicus), in-situ sensors, and citizen science, with annual reporting on progress.
- Invest in capacity and expertise through increased funding for NPWS, academic partnerships, and citizen science platforms to ensure early expert engagement and data quality, addressing gaps noted in current bilateral processes.
- Implement continuous improvement tracking under Article 4(11), using indicators of habitat structure/functions to demonstrate trends towards good condition, with adaptive revisions to restoration measures where deterioration risks emerge.
- Promote public data access via GIS portals to maximise transparency, stakeholder input, and compliance verification, aligning with Article 20(8) and (9).

Continuous improvement and non-deterioration

To ensure continuous improvement in the condition of Annex I habitats and the habitats of species subject to restoration measures under Article 4, Member States shall under Article 4(11) put in place measures to prevent significant deterioration. In addition, Article 4(12) requires Member States to endeavour to put in place the necessary measures to prevent the

deterioration of Annex I habitats that are in good condition or are required to meet restoration targets.

These obligations apply to habitats both within and outside the Natura 2000 network. The commitment in the draft NRP that “*ongoing regulatory measures will continue to be reviewed and improved as necessary*” is insufficient to meet the requirement to put in place concrete measures that ensure continuous improvement. Furthermore, in relation to non-deterioration, Member States must, by the date of publication of the NRP, be in a position to demonstrate that efforts have been made to prevent habitat deterioration.

Recommendation: In light of the clearly identified pressures reported under Article 17, it is incumbent on the Irish authorities to introduce additional, targeted protective measures to address these pressures. This is necessary to ensure both continuous improvement and the prevention of significant deterioration of habitats, within and beyond the Natura 2000 network.

Marine: Art 5

Article 5 is a central provision of the NRR, establishing binding targets and timelines for the restoration of marine ecosystems across EU waters. It requires Member States to implement measures to restore degraded marine habitats, improve the condition of protected species’ habitats, close knowledge gaps, while also embedding obligations on non-deterioration and the continuous improvement of ecosystem condition over time.

12 out of 14 marine habitats have been identified as being in bad or unfavourable condition in the latest Article 17 report. While NPWS has the responsibility for managing Natura sites, when it comes to the marine Natura sites, it is not clear who is responsible for monitoring and managing these areas.

DAFM has responsibility to regulate fishing activities through Fisheries Natura Declarations (FNDs) in protected areas, although these are few and far between. Fishing licences are not tied to a specific area and so it is hard to determine where an activity will occur and therefore many activities occur without an environmental assessment or monitoring of impacts. The draft plan states, ‘As direct biological condition data are not available for all marine habitats at national scale, a pressure–exposure framework was applied. Using this approach, areas where mapped pressures overlap with habitats known to be sensitive to those pressures are identified as being at risk of not being in good condition.’ This approach will not give an accurate percentage of habitats not in good condition. The vast majority of registered Irish vessels are under 10m in length and vessels under 12m in length are not required to use a vessel monitoring system. Due to this, fishing pressure will not be accurately represented.

Ireland's inshore marine environment contains the majority of marine Natura 2000 sites which should be prioritised up until 2030. These areas do not need to undergo consultation with other Member States under Art.11 of the Common Fisheries Policy and contain the majority of habitats which need to be restored under the law. Likewise many remote deep sea ecosystems - cold water corals, sponge grounds and seamounts – should already be protected by effective enforcement of the EU ban on bottom trawling in EU waters of the North-East Atlantic below 800m. Both scenario's demonstrate ample opportunity to guarantee that the restoration targets for 2030 will be met and are supported by the recommendations of the IAC.

High level Recommendations relevant to Article 5

Recommendations:

- Enact ambitious national Marine Protected Area (MPA) legislation. This legislation must include a target for at least 30% of Irish waters to be designated as an MPA, with at least 10% designated as strictly protected, by 2030. Designations must be accompanied by site specific management plans to ensure the effective protection and non-deterioration of the ecosystems within. MPAs should be created using a cocreation and co-management approach including all relevant interest-holders such as the fishing industry and communities. New Protected Areas should overlap with the habitat types identified in the NRR, contribute to the Nature Restoration targets and complement the existing Natura 2000 sites.
- Restoration measures should be aligned with the objectives of the Birds and Habitats Directives, Water Framework Directive (WFD), Marine Strategy Framework Directive (MSFD) and Common Fisheries Policy. Integrating restoration measures into workplans for the MSFD and WFD is essential.
- Member states are required to prioritise Natura 2000 sites up until 2030, however many key habitats occur outside these areas and should also be subject to restoration measures bearing in mind the longer term targets for 2040 & 2050. Restoring and protecting these habitats now is easier and more cost effective than re-establishing them later. This also includes protecting the habitats and food sources of species listed in the regulation
- Group 7 is subject to a lower restoration threshold. The percentage should be set at an ambitious number as soft sediments in the wider marine space are intrinsically linked to coastal and transitional habitats (estuaries, salt marshes, mudflats in Article 4)
- An analysis of future impacts of industries should be conducted and results taken into account. Offshore renewable energy will be progressed over the next decade and the impact this has on the ecosystems and species should be accounted for and mitigated against in the restoration plan. Displacement of fisheries also needs to be taken into account and appropriate compensation offered to avoid damage or increased fishing effort in other areas.

- Damaging activities, such as bottom trawling, must be restricted in order to restore marine ecosystems.
- Increased coordination across Government departments and bodies since pressures from the land impact the marine environment. A coordinated approach is essential for successful restoration. All restoration plans and activities must be developed in consultation with local stakeholders and with the Department of Agriculture, Food and the Marine where the responsibility for fishing activity lies, the Department of Climate, Energy and the Environment where the responsibility for the MSFD, Maritime Planning and implementation of national Marine Protected Areas lies and the Department of Housing, Local Government and Heritage where the responsibility for Natura 2000 sites lie. Clarity is needed on how conflicting interests among these departments are resolved and overarching decisions are made.
- Pressures must be identified and mitigated against, otherwise active restoration measures will be costly in time and resources and have a high chance of not succeeding.
- Ensure full and effective enforcement and management of existing measures in the marine environment.
- The Department of Agriculture, Food and the Marine must increase the number of active FND's in Ireland's current Natura 2000 to manage fishing activities.
- Reduced fishing effort through structured participation management for any fisheries that could have an impact on habitats and species.
- Clarify roles and responsibilities for marine protection. A clear governance framework must be established to oversee the design and implementation of nature restoration activities at sea, particularly within existing protected areas and any new ones that are created.
- Protected sites should appear on nautical maps for fishing vessels.

Accurate estimates of habitat coverage

In the NRP, coverage of marine habitats has been vastly underestimated and hasn't taken into account best scientific evidence. Baseline coverage of habitats must be accurate in order to ensure effective restoration takes place to meet the targets within the law. For example, the national plan states that seagrass beds have an estimated coverage of 23.5 km² while recent scientific publications state that there is **at least** 54.85 km² (Beca-Carretero *et al.* 2024).

The report states that pressures were overlaid with available information on where habitats occurred and this allowed them to estimate the area of habitat not in good condition. For Group 7 habitats the plan states that 46428.67 km² are not in good condition. However, the 2024 report by the Marine Institute, Atlas of Commercial Fisheries around Ireland 4th Edition, shows that many forms of bottom contact fishing including demersal seine, dredging,

demersal otter trawl and beam trawl occur in a huge percentage of the Irish Exclusive Economic Zone (EEZ). The pressure data which has been used to estimate the area of habitats not in good condition should be provided for clarity.

The ranges which have been provided in the draft NRP, do not match with the ranges of relevant habitats which were reported in the 2019 Article 17 habitats directive report. The ranges have been significantly decreased and there has been no information given on why this is the case. For transparency, NPWS should provide the full extent of data sets which were used to justify the decrease in each habitat range.

Favourable Reference Area

The plan states that. *‘Favourable reference area represents the spatial extent of a habitat that could exist if pressures reducing its structure or function were managed or removed.’* It also states that, *‘The estimation of FRA can be best tied to data collected under the framework of European Directives, mainly the Habitats Directive, but must allow for areas that have not seen the occurrence of Group 1-6 habitats for perhaps decades if the removal of the barriers to restoration is feasible’*. There is a legal requirement to achieve FRA and so if there are barriers to achieving this, the plan should document them and the actions that will be taken to address them. According to the EU report from the expert group on reporting under the Nature Directives, which interprets favourable reference values from the EU Habitats Directive, *‘Favourable reference range is the range within which all significant ecological variations of the habitat are included for a given biogeographical region and which is sufficiently large to allow the long-term viability of the habitat ‘. The majority of marine habitats included in the Article 17 habitats directive report which relate to the habitats included in Article 5 of the NRR show a deteriorating trend and their status has declined since the last reporting period in 2019. This shows that these habitats are not maintaining their long term viability and the report from the EU expert group on the Nature Directives, states that trends (short-term, long-term, historical, i.e. well before the Directive came into force) should be used when determining FRA. The report also says ‘In many cases it is not possible to estimate a value for favourable reference range but it is clear that the favourable reference range is greater (or much greater) than the present-day value.’*

Setting FRA the same as the current estimated range of habitats is not appropriate or scientifically robust. This shows a lack of ambition for the future of the plan to restore the marine environment and absolves the Government in committing to reestablishment targets for 2030. The explanation in 7.2.3.3 on how FRA was calculated does not consider ecological potential (potential extent of range, taking into account physical and ecological conditions), natural range, historical distribution and abundances and causes of change, including trend, connectivity, fragmentation, dynamics of the habitat and the requirements of the species that rely on the habitat.

The 2013 Article 17 report from the NPWS stated, *‘Favourable Reference Values are set as targets against which current values are judged. These reference values should be at least equal to the value when the Directive came into force unless this value is not deemed to be*

enough to ensure the long term survival of the habitat or species being assessed. There is historical evidence showing that marine habitats have declined in Irish waters, for example oyster reefs, which fall under the habitat group of shellfish beds, but this has not been acknowledged in the draft plan.

Recommendations:

- As outlined in our recommendation for Art 4, the establishment of FRA must take into account the Commission's guidance, the requirements of Art 14(2), based on comprehensive evidence from historical datasets, ecological needs and expert opinion.
- Ranges prior to 1994 when the Habitats Directive was initiated must be taken into account.
- Collect historical data from available fossil records (ex. Trinity work on oyster reefs) and / or use known habitat loss data to estimate the area of habitat present when the Habitats Directive came into effect.
- Collect backlog data from the National Biodiversity Data Centre, Seasearch and other citizen science organisations to help establish where habitats were previously found and have been lost.
- Follow guidelines available in EU reports such as the one mentioned above in order to sufficiently calculate appropriate FRA. Connectivity and fragmentation must be taken into account alongside potential extent of range and requirements of species depending on habitats.
- Climate projections should also be taken into account. As habitats will face greater pressure as the climate changes, it is imperative an ambitious range is achieved to ensure that the habitats have the greatest resilience to future changes.

Restoration of species habitats in Annex III and the Birds and Habitats Directives

In reference to 7.2.4.2 within the draft plan, it asks Member States to ‘Indicate one or more habitats from the code list of European Nature Information System (EUNIS) marine habitats.’ The answer to this was, *‘Further work required to link each species to the relevant EUNIS habitat and/or associated pelagic waters.’* This answer shows a lack of ambition to identify the appropriate habitats of species when the information is easily available through numerous scientific studies. This then allowed the section asking for the indicative total surface area subject to restoration measures to be left blank. Article 5(5) of the NRR states, *‘Member States shall put in place restoration measures for the marine habitats of species listed in Annex III to this Regulation and in Annexes II, IV and V to Directive 92/43/EEC and for the marine habitats of wild birds falling within the scope of Directive 2009/147/EC that are, **in addition** to the restoration measures referred to in paragraphs 1 and 2 of this Article, necessary to improve the quality and quantity of those habitats, including by re-establishing them, and to enhance connectivity, until sufficient quality and quantity of those habitats is*

achieved. Information is readily available on the habitats used by marine species within the law and should have been included in the draft plan. Please refer to Table 3.a. And 3.b of EUNIS habitats present in Important Shark and Ray Areas. Excluding this information from the plan goes against the legal requirements for habitat restoration of marine species included in the law.

Recommendations:

- Identify the habitats used by the species included within the NRR, Habitats and Birds Directives and calculate the surface area so that an estimate of the area needed for restoration and reestablishment can be included in the draft plan.
- Ensure that any activities which could pose a threat to the species listed undergo appropriate AA's and, if needed, a just transition to a less harmful activity is supported by Government through financial and resource supports. This includes damage to their habitat, food source or the species themselves. The mitigation hierarchy should also be undertaken to minimise impacts. 1. Avoid impacts, 2. Mitigate unavoidable impacts through minimisation measures, 3. Restore damaged habitats to natural state, 4. Offset residual impacts by supporting equivalent environmental gains elsewhere.
- Habitat restoration for the species included in the law should take place in the areas where these species are known to occur and ensure ecologically connected habitat corridors for wide ranging species as called for in Article 5(8) of the law.

Important Shark and Ray Areas areas in Ireland

In 2025, the IUCN Species Survival Commission's Shark Specialist Group's Important Shark and Ray Areas (ISRA) team worked with regional experts to map ISRAs in European waters. ISRAs are defined as "discrete, three-dimensional portions of habitat, important for one or more shark species, that are delineated and have the potential to be managed for conservation". Twelve full ISRAs and 4 Areas of Interest (AOIs) were mapped in or overlapping with Irish waters for a total of 21 qualifying species and 38 supporting species¹³. Among these species, four are included in the NRR's Annex III for Restoration of marine ecosystems, three of which are threatened with extinction in Ireland and globally. Each of these areas are defined by the physical, biochemical and biological characteristics of their ecosystems, including habitats present, which contributes towards the regular and predictable presence of the qualifying and supporting species and have the potential to be managed for conservation. AOIs may have irregular sightings, historical records or a lack of information on the behaviours of the species in the areas and should be included in the consideration of measures as action taken could contribute towards restoring populations in key areas to species' life-histories.

Habitat restoration has been shown to be of benefit to populations of elasmobranchs around the world, such as in the case of estuaries in California which were restored to a suitable state

¹³ <https://sharkrayareas.org/isra/selection-criteria/>

for populations of gray smooth-hound sharks to recover^{14 15}. These habitats are defined as “critical” as they support important life traits such as reproductive areas, foraging grounds or nursery habitats that are key to species’ survival and population recoveries.

Recommendations

- While data gaps exist, there are certain actions that could be implemented now that would have a huge impact on populations of critically endangered species where they are known to occur. Restoration activities, and restrictions of damaging activities such as tangle nets should be implemented as a matter of urgency in these areas to protect critically endangered species such as the angel shark, flapper skate, white skate, common (blue) skate.
- Given the perilous conservation status of these species it is critical that Ireland takes urgent action, prioritising habitats within the ISRA’s for restoration by 2030. Given that many of these species are data deficient, the ISRAs should be recognised as representing the best available scientific advice.
- Ten of the Twelve ISRAs and one of the AOIs have confirmed records of at least one of the Annex III species. Restoration of habitats in these areas would benefit these species, particularly in the case of bottom-dwelling species (e.g. Angelsharks) that forage on fish and invertebrates.
- Given the overlap between the ISRAs of relevant Annex III elasmobranch and Annex II habitats (Table 3) prioritising these areas for restoration would help to deliver on key legal obligations of Art 5 in an efficient and ecologically coherent way.
- Of the restoration measures found in Annex VII, (22) (25) (26) and (30) are of particular direct importance for the species and locations discussed here. Though all measures, if implemented, will have a positive impact on the species.
- Several NGOs have completed work on specific species and important areas for their conservation which should be taken into account, for example Birdwatch Ireland.

Addressing Knowledge Gaps

The draft plan mentions several methods to addressing knowledge gaps up until 2030 including targeted national cross-Departmental survey programmes using a combination of remote sensing (multibeam echosounder, side-scan sonar), drop-down video, and ROV surveys, aligned with existing initiatives such as INFOMAR. Since the marine environment is severely data deficient, it is not credible that all available data sources would not be used, particularly citizen science. Taking into account citizen science data from organisations such

¹⁴ [Espinoza et al., 2011](#)

¹⁵ [Ward-Paige et al., 2012](#)

as Coastwatch, the National Biodiversity Data Centre and Seasearch will also be beneficial in addressing knowledge gaps.

Recommendations:

- An important part of data collection will be taking into account the range of citizen science which is available. An example is Coastwatch's recent seagrass map. Over 89 seagrass beds were mapped, many of which had been discovered by volunteers and which aren't currently included in current Natura sites qualifying interests
- Collate all available data on habitat types into one online publicly available database.

Non Deterioration Principle

Section 7.4.2 specifically mentions the MPA LIFE project which will be a vital tool in designating and protecting areas at sea, although it failed to mention the passing of ambitious national MPA legislation which will be the underpinning legal basis to achieve 30% MPA coverage by 2030. This legislation also needs to include a target of having at least 10% of Irish waters strictly protected. Passive restoration is the removal of pressures, which is essentially strict protection. It's been shown that passive restoration is the best way to begin restoring habitats in the marine environment. The sections failed to mention that additional funding and resources will be required for NPWS and other relevant bodies like the SFPA in order to ensure the effective monitoring of protected and restored areas which will be vital to prevent deterioration.

The section speaks about the ongoing process for managing sea fisheries in and around Natura 2000 sites. The system that is in place does not effectively protect marine habitats (proven by looking at the results of the latest Article 17 Habitats Directive report). There has been no improvement in the status of marine habitats over the last 2 reporting periods with many habitats decreasing in status and showing deteriorating trends. Reasons behind this include improved knowledge on the areas but also a lack of effective management of activities. Many sea fisheries are not currently treated as a 'plan' and therefore are not subject to appropriate assessments even when they occur in protected areas. European Union (Birds and Natural Habitats) (Sea-Fisheries) Regulations 2013 (S.I. 290 of 2013)¹⁶ states that fisheries which do not classify as a 'plan' will be subject to a risk assessment process by the Marine Institute. There was a report released in 2015 showing risk assessments undertaken in certain Natura sites (although the entire east coast was excluded) but there is no evidence of any restrictions that were put in place or ongoing monitoring and assessments. We believe that the process for managing sea fisheries does not fulfil the requirements of the Habitats Directive. Fisheries Natura Declarations (FNDs) are initiated by the Department of Agriculture Food and the Marine. No FNDs were released in 2025 and there have only been 4 initiated since 2019. In total 11 FND's have been initiated since the process began in order to manage all fishing activities around protected sites at sea in the Irish inshore area. Many of these declarations are

¹⁶ [European Union \(Birds and Natural Habitats\) \(Sea-Fisheries\) Regulations 2013 \(S.I. 290 of 2013\)](#)

geographically small and contain weak restrictions. We don't believe that this is an appropriate level of management for activities around protected areas.

In regards to aquaculture this sections states, '*appropriate assessments are undertaken on a bay-by-bay basis, with aquaculture projects only authorised if they (individually or in combination with other plans or projects) do not give rise to significant adverse impacts on the integrity of the applicable Natura 2000 sites, having regard to their conservation objectives*'. Under the Fisheries Act section 19A (4), aquaculture developments are permitted to continue operating when their licence has expired as long as they have applied for a new one. There are examples of many aquaculture developments operating for several years, without environmental assessment, while waiting for these licenses.

Part C of the plan lists current measures that are in place to prevent the deterioration of the marine environment and fails to mention any improvements or future measures that the government plans to put in place. Current measures are not working and are not sufficient in ensuring that restored habitats do not deteriorate. This section provides the opportunity to acknowledge that and highlight new actions which will be taken to address this.

Recommendations

- Increased funding and resources to relevant bodies responsible for managing and monitoring activities around Natura 2000 sites
- All fisheries should undergo appropriate assessments or rigorous risk assessments in order to ensure they will not impact on the conservation objectives of a site or the restoration measures that will be put in place
- All current risk assessments for fisheries which the Marine Institute undertakes should be linked in the draft NRP. The last available online record of risk assessments across a broad range of Natura 2000 sites is from 2015.
- Ongoing adaptive management of marine activities must be undertaken. This process should be open, transparent and include effective stakeholder engagement
- Clarity must be given to the public on these processes as currently it is difficult to find out information on how activities are monitored.
- Loopholes in the Fisheries Act allowing Aquaculture developments to continue without a licence and ongoing environment assessments must be addressed and brought into line with EU law.
- Habitat types do not exist in isolation and there must be coordination between Article 4 and Article 5 habitats with a systems orientated approach undertaken. Species listed in the NRR and Nature Directives use numerous habitats across Articles 4 and 5 and these ecological requirements must be taken into account. Pressures do not exist in isolation either. Agricultural and sewage runoff cause extreme deterioration to the habitats listed in Article 4 and 5 and cross departmental work on these issues must be made a priority.

- Habitats which are considered to be in good environmental status, should have measures in place to ensure that they do not deteriorate.

Summary of planned measures including those that require Joint Recommendations through the CFP

Section 7.1.4.1, where countries should detail their plans for Joint Recommendations (JRs) under the EU Common Fisheries Policy, only mentioned JRs in order to restore soft sediment habitats under Group 7. JRs will not only be needed to protect and restore habitats included in Group 7, but also other habitats from Groups 1-6 for example reef habitats. Ireland has large areas of offshore cold water corals that have been damaged or completely destroyed by bottom towed fishing gear. Waiting to initiate JRs until the percentage target for restoration is agreed for soft sediments fails to acknowledge the severity and time sensitivity of the situation. Cold water corals do not have a lower restoration target and are subject to the legally binding targets included in the NRR. The JR process is a long and difficult one and Ireland must ensure that putting together plans and initiating JRs is a top priority. Ireland is yet to initiate a JR and therefore has not effectively ensured the protection of offshore ecosystems. Without initiating JR's, Ireland will not only fail to restore offshore marine ecosystems, it will also fail in reaching the globally agreed and legally binding target of having 30% of its waters effectively protected by 2030.

Recommendations

- Add additional information to this section, showing that the JR process is a top priority within the national restoration plan.
- Acknowledge the range of offshore habitats which must be protected under JRs and put together sufficient plans in order to restore these areas.
- Detail the measures Ireland plans to take, for example engaging with the North Western Waters Advisory Council, to start the JR process.

Urban Ecosystems: Art 8

Article 8 - Restoration of urban ecosystems - requires Member States to ensure no net loss of urban green space and urban tree canopy cover by 2030 compared to 2024 levels, and then to secure a continuing increasing trend in both from 2031 onwards.

The engagement of housing officials from the Department of Housing, Local Government and Heritage with the NRP, and in particular Article 8, has been unacceptable to date. The Article 8 reporting requirements within the draft NRP have effectively been left blank, and the

Independent Advisory Committee for Nature Restoration received no substantive engagement from officials on urban ecosystems, aside from a preliminary presentation in April 2024.

This lack of engagement is further compounded by the Department’s consistently negative approach to the regulation since the Commission’s original proposal. The root cause appears to be that the current private developer-led housing strategy is not aligned with the sustainable development approach underpinning the regulation.

In the draft NRP, the Article 8 targets are framed as being in conflict with “*the planned growth and development of our urban areas, including the provision of housing, infrastructure, and social, community, employment or commercial development.*” In reality, green spaces constitute critical infrastructure, essential to the health and wellbeing of both citizens and nature. Increased housing provision and expanded green space can be delivered simultaneously through a more sustainable and compact urban development strategy.

A new national target for green space and urban tree canopy cover

Ireland must urgently establish a new national target for urban green space and urban tree canopy cover to meet its Article 8 obligations under the NRR. The private sector driven development of housing on urban green space must be reformed in order to deliver denser housing, lower car dependency and greater access to green space and nature for all citizens in urban environments regardless of socio-economic background.

Current local strategies (e.g. Dublin City and Fingal tree plans) show welcome ambition, but lack a binding national framework with quantified baselines, no-net-loss commitments by 2030, and increasing trends thereafter, as explicitly required by Article 8.

The National Planning Framework (Project Ireland 2040) emphasises the provision and enhancement of urban green space as part of compact growth, healthy communities and green infrastructure, but does not set quantitative national targets for green space or canopy cover.

The EPA-supported work on “protecting and developing Ireland’s green and blue spaces” explicitly links improving urban green space provision to delivering National Planning Framework objectives, again as guidance rather than binding commitments.

A national policy on urban greening is needed which builds on existing best practice while addressing the legal obligations of the NRR.

Recommendations:

- Urgently adopt a legally binding target of no net loss of urban green space and canopy cover (relative to 2024 levels) by 2030, followed by sustained increases from 2031, integrated into Ireland’s National Restoration Plan.
- The Environmental Pillar supports the recommendations of the Leaders Forum on Restoring Urban Biodiversity and endorses the call to integrate nature throughout

urban planning, development, transport, and climate adaptation. We particularly support the need for strong policy frameworks, sustained funding, participatory implementation, and robust monitoring to ensure that urban nature restoration delivers real and lasting benefits for biodiversity, climate resilience, public health, and communities.

Integrating Urban ecosystem restoration into the planning system

The obligations of Art 8 are relevant to future planning decisions in relevant urban areas which must be taken into account by planning authorities. Given that these obligations are already in effect under the NRR it is incumbent on the Minister to ensure that planning authorities give effect to these new legal requirements in planning decisions moving forward.

While noting that the Environmental Pillar have expressed serious concerns regarding the disproportionate amount of discretionary power afforded to the Minister under the new Planning and Development Act 2024, it is clear that Ireland already possesses legislative tools, that can be deployed to ensure that the NRRs Article 8 urban greening requirements are implemented by planning authorities without delay.

Under Section 28 of the Planning and Development Act 2000, the Minister may issue binding planning guidelines to which planning authorities and An Bord Pleanála must have regard. Crucially, 2018 amendments to the Act introduced Specific Planning Policy Requirements (SPPRs) provisions that must be complied with, not merely considered. Furthermore, planning authorities are now required to explicitly demonstrate in their development plans how they have implemented these guidelines, or explain why they have not.

Although the Planning and Development Act 2024 repeals Section 28, it introduces transitional measures: all existing Section 28 guidelines remain in force unless revoked or contradicted by a National Planning Statement (NPS).

Recommendation: The Minister should already use his authority to issue binding guidance or policy directions to ensure that urban greening under Article 8 of the NRR is incorporated into planning decision making.

Urban Greening Reporting Duty

The recently commenced Wildlife (Amendment) Act 2023, under Part VA, Section 59B (a)–(c), introduces a new biodiversity duty reporting obligation for local authorities. This includes reporting on actions taken under the National Biodiversity Action Plan (NBAP), which could be expanded or interpreted to encompass urban ecosystem restoration in line with the NRR. While the relationship between the NBAP reporting and the NRR remains to be clarified, it offers a parallel accountability mechanism that could support enforcement or monitoring of urban greening commitments.

Recommendation: A new urban greening reporting obligation should be introduced for local authorities under Wildlife (Amendment) Act 2023, under Part VA, Section 59B (a)–(c).

Restore Nature in Urban Environments for wildlife

Urban areas mainly constitute heavily modified environments which are dominated by human activities. Resulting habitat destruction, degradation, fragmentation and disturbance create a challenging environment for many species but despite this many urban areas in Ireland support important areas for biodiversity which should be enhanced in order to contribute to both Art 8 urban greening requirements but also restoration obligations on land and at sea.

Planning authorities should require swift bricks in all new urban development's alongside a suite of proactive urban greening measures to enhance biodiversity in urban environments

Recommendations:

- Mandate Swift Bricks (for swifts, sparrows, martins) as mandatory in new residential/commercial buildings and other measures designed to restore biodiversity in urban environments.
- Mandate green roofs/walls, native planting, Pollinator areas, permeable SuDS, and tree canopy expansion in planning for all urban projects.
- Replace hard surfaces with permeable infrastructure like rain gardens, native meadows, living walls, and tree canopy to manage flooding, cool cities, and support wildlife.
- Expand green-blue networks - Map and connect parks, rivers, canals, urban trees lines, and habitats into ecological corridors with hedgerows and wildlife routes to enable greater ecological connectivity.
- Deliver ambitious nature restoration in urban environments - Urban areas support both important Natura 2000 sites, nature reserves and city parks that should be subject to restoration under the NRP.
- Artificial light at night (ALAN) should be minimised and, where possible, avoided within green and blue corridors, as it can act as a barrier to movement and disrupt ecological connectivity for many species.

Restore Nature in Urban Environments for wildlife and people

Access to urban green spaces and nature is vital for physical and mental wellbeing. Unfortunately there are significant barriers to many communities' access to nature. Moving forward authorities must provide equitable opportunities for access to nature and its associated opportunities for stress reduction, exercise, and social connection. Research shows these spaces lower risks of cardiovascular disease, obesity, anxiety, and depression while boosting mood, immunity, and longevity, benefits amplified in deprived areas where health

disparities are starkest. Ensuring high-quality, biodiverse green spaces within walking distance of every home would promote inclusive benefits for public health and community resilience.

Recommendations:

- Access to Green Space and Nature should be considered as a basic human right and as a necessity for physical and mental health regardless of socio-economic background. Deprived areas in particular should be prioritised for new greening measures.
- Reclaim space from cars - Repurpose roads/parking for green corridors, pedestrian/cycling routes, and biodiverse planting; implement 15-minute city principles for accessible green spaces.

Rivers & Floodplains: Art 9

Rivers & Floodplains: Art 9 - requires Member States to contribute to the EU target of restoring at least 25,000 km of free-flowing rivers by 2030, primarily through the removal of artificial barriers, the restoration of river connectivity, and the restoration and maintenance of the natural functions of associated floodplains.

In the Irish context, Art 9 should be understood not only as a biodiversity obligation, but also as a key opportunity to deliver water quality, climate adaptation and flood-risk benefits through integrated catchment restoration. Article 9 of the NRR provides a significant opportunity for Ireland to move beyond a narrow focus on barrier mitigation to facilitate fish passage and towards an ambitious programme to restore wetlands including free-flowing rivers, riparian habitats and floodplains.

Building on the National Barrier Mitigation Programme

Ireland already has an important foundation in the form of the National Barrier Mitigation Programme (NBMP), led by Inland Fisheries Ireland, which is building the evidence base for barrier identification, assessment and prioritisation. The programme's work on surveying potential barriers, developing a geolocated database, and assessing sites provides a valuable starting point for Article 9 implementation. However, there is a clear gap between the current scope of the NBMP and the full legal and ecological ambition of Article 9. The NBMP is primarily framed around mitigating barriers to fish movement (longitudinal connectivity), whereas Article 9 requires a broader approach that explicitly includes the removal of artificial barriers, the restoration of river and floodplain connectivity, and the improvement of the natural functions of related floodplains.

It is clear from the draft NRP that insufficient work has been done to date on lateral connectivity and that assessment of related floodplains will only commence in 2026 with a high-level desktop study on the extent of floodplain disconnection on a national scale.

Recommendations:

- Ireland's NRP should broaden and strengthen the NBMP so that it becomes a core delivery mechanism for Article 9 rather than a parallel or partial response.
- Increase resourcing for Inland Fisheries Ireland's barrier teams with ringfenced funding to meet Article 9 objectives.
- Accelerate the delivery of the EPA's national *ecological floodplain map* by end-2026 to support the identification of restoration potential.
- Ensure that the future selection of sites under the NBMP take into account the need to address both longitudinal and lateral connectivity and the need to improve the natural functions of related floodplains.
- Artificial light at night (ALAN) should be recognised as a barrier to fish migration. It should be minimised and, where possible, avoided along waterways, as it can act as a barrier to movement and disrupt ecological connectivity for many species.

Prioritisation of rivers and floodplains for intervention

The Art. 9 obligations originate in the EU Biodiversity Strategy for 2030, which requires greater efforts to be made to restore freshwater ecosystems and the natural functions of rivers. The EU Biodiversity Strategy requires the restoration of freshwater ecosystems, including efforts to restore the natural connectivity of rivers as well as their riparian areas and floodplains, including through the removal of artificial barriers, in order to support reaching of Favourable Conservation Status for rivers, lakes and alluvial habitats and species protected under the Habitats and Birds Directives.

Therefore, a central priority should be the development of a national inventory that goes beyond listing structures to identify where barrier removal and floodplain restoration will deliver the greatest ecological benefits. Priority should be given to rivers, riparian zones and floodplains associated with SACs, SPAs, and alluvial habitats, particularly where restoration would support the achievement of favourable conservation status under the Habitats and Birds Directives. Likewise, restoration should be targeted to water bodies with high-status objectives under the Water Framework Directive, where removing barriers and reconnecting floodplains can help secure and sustain good ecological condition. This prioritisation is essential if Ireland is to meet Article 9 in a way that is strategic, measurable and ecologically credible.

Recommendation: Develop a national Article 9 prioritization framework inventory with the EU Biodiversity Strategy for 2030, the Habitats and Birds Directive and the Water Framework Directive, prioritising:

- Designated SACs, SPAs and the habitats of relevant Annexed species for restoration so that Art 9 can contribute to the achievement of FCS and the rehabilitation of High Status Water bodies.

Remove obsolete barriers

By 2030 the plan should also take advantage of “low-hanging fruit”, especially obsolete barriers that no longer serve a meaningful public purpose and may instead pose safety, maintenance or ecological risks. Such barriers are often the most straightforward candidates for removal, and removing them can rapidly improve longitudinal connectivity, habitat quality and river resilience. At the same time, priority should be given to sites where barrier removal can unlock wider catchment-scale restoration, including re-meandering, wetland rehabilitation, riparian planting and reconnection of floodplains. This would ensure that Article 9 is implemented as a landscape-scale restoration measure rather than a series of isolated engineering interventions.

Recommendation: Remove obsolete barriers which no longer provide a valuable contribution to society and in addition to their negative ecological impact may pose a health and safety risk.

Restore habitat as a Nature Based Solution to flood risk mitigation

Ireland should also explicitly embrace river and floodplain restoration as a nature-based solution to flooding. Natural water retention measures, river restoration and re-meandering can “slow the flow”, reduce flood peaks downstream and store flood waters, while also delivering biodiversity and water quality co-benefits. This is especially important in the context of climate change, where more intense rainfall and more frequent flooding are increasing pressure on communities, farmland and infrastructure. Floodplain restoration should therefore be treated as part of flood-risk management, not as an optional add-on to conservation policy.

Recommendation: Embrace river and floodplain restoration as nature-based solutions to flood risk management by integrating them into national flood policy, delivering co-benefits for biodiversity, water quality and climate resilience.

Legislative Review: Reform Arterial Drainage Act and OPW

The Arterial Drainage Act 1945 has enabled decades of aggressive channelisation, embankment construction, and floodplain disconnection by the Office of Public Works (OPW), severely degrading river and floodplain ecology. These “hard engineering” interventions, straightening meanders, deepening channels, and removing riparian vegetation,

have fragmented habitats, reduced ecological connectivity, trapped sediments and pollutants, diminished natural flood storage, and contributed to poor conservation status for many SAC rivers and alluvial habitats under the Habitats Directive. Straightened, over-widened channels increase flow velocity, erode beds, and prevent natural meandering essential for fish spawning, invertebrate diversity, and nutrient cycling, while disconnected floodplains lose wetland functions critical for water purification and biodiversity.

This legacy directly undermines Article 9 goals and WFD high-status objectives. The OPW's ongoing maintenance dredging and embankment reinforcement perpetuates this damage, often overriding environmental considerations despite statutory obligations under the EU Birds/Habitats Directives and now the NRR. The OPW's destruction of alluvial woodland and other Annexed habitat is also not coherent with obligations to restore and re-establish these habitats within the NRP.

Recommendation: Urgently review and amend the Arterial Drainage Act 1945 to:

- Explicitly prioritise nature restoration and resilient flood protection over land drainage.
- Reform the OPW's remit to prioritise nature-based solutions.
- Streamline enforcement powers across water agencies (OPW, IFI, EPA, NPWS) with mandatory environmental impact assessments, public accountability mechanisms, and coordinated catchment planning to halt ecological degradation and support Article 9 compliance.

Reward farmers and land owners for managing flood waters

Where floodplain restoration requires land which would historically have been grazed to be taken out of production or regularly inundated, fair compensation and appropriate support for affected farmers and landowners will be essential. In many cases, land managers are being asked to provide a public good by accommodating water storage and flood attenuation that protects homes, infrastructure and downstream farmland. Ireland should recognise this explicitly in the NRP, drawing on international best practice, such as the Dutch 'Room for the River programme', and ensuring that restoration is equitable, durable and socially legitimate.

Recommendation: Provide fair compensation and support for farmers and landowners whose floodplain land is restored for floodwater storage, recognising their public good in protecting downstream communities.

Adopt a holistic, integrated catchment-based approach

Barrier removal, nature-based flood risk management, and broader nature restoration must form a unified strategy to tackle Ireland's interconnected river pressures - water pollution, habitat fragmentation caused by barriers and channelisation, escalating flood risk from climate-driven extreme rainfall, and ongoing biodiversity loss. This approach ensures

coordinated action across scales, delivering Water Framework Directive compliance, resilient ecosystems, flood protection for communities, and sustainable benefits for water quality and wildlife.

Recommendation: Adopt a holistic, catchment-based approach integrating barrier removal, nature-based flood management, and restoration to address water pollution, habitat fragmentation and flood risk, delivering WFD compliance and multiple ecosystem benefits.

Pollinators: Art 10

Article 10 sets binding targets for Member States to improve pollinator diversity and restore pollinator populations, with progress to be monitored and reported using a unified science based methodology.

Invertebrate pollinators include charismatic bees and butterflies but also hoverflies, beetles and wasps. Pollinators are critical to ecosystem functioning, enabling reproduction in 75-90% of flowering plants, supporting food webs, habitat formation, and nutrient cycling. Without them, wild plant diversity collapses, disrupting entire ecosystems. They underpin 35% of global crop production (e.g., fruits, nuts, vegetables), valued at \$200-577 billion annually, while enhancing nutrition, soil stability, and carbon sequestration. Restoring pollinators is critical to biodiversity, agricultural productivity and resilient food systems.

Declines in pollinator populations signal broader biodiversity loss, as they are highly sensitive to habitat fragmentation, pesticides, and pollution. Monitoring them reveals environmental threats early, like ecosystem disruptions that cascade to other species. Their health reflects overall ecological balance, with losses triggering feedback loops in food webs and food production.

In Ireland pollinators are in need of urgent conservation interventions. The IUCN Red List assessment suggests that 43% of bees and 34% of butterflies are at threatened or near threatened status in Ireland¹⁷. One-third of Irish bee species are threatened (30 of 100 species), with 10% critically endangered, 6% critically endangered and 3% already regionally extinct¹⁸. The Irish Grassland Butterfly Index shows five of seven monitored species declined by an average 65% from 2008-2023.

¹⁷ DCHG (Department of Culture, Heritage and the Gaeltacht), 2019b. Ireland 6th National Report to the Convention on Biological Diversity. Government of Ireland, Dublin.

¹⁸ Fitzpatrick, Ú., Murray, T. E., Byrne, A. W., Paxton, R. J., & Brown, M. J. F. (2006). Regional red list of Irish bees. National Parks and Wildlife Service (Ireland) and Environment and Heritage Service (N. Ireland)

Threats / Pressures

Agricultural intensification via fertilizers, herbicides, re-seeding, and the transition to silage has driven the loss in the diversity and abundance of host plants and floral resources. In addition, semi-natural habitat loss has been driven by land use-conversion by afforestation, quarrying and construction. Another major pressure is under-management and land abandonment leading to succession and scrub encroachment¹⁹.

Extensive evidence shows that many pesticides harm pollinators and other beneficial insects both directly, through lethal and sublethal effects on reproduction, navigation, learning, foraging, and physiology, and indirectly, by reducing essential floral resources. Pesticide exposure also worsens other major stressors such as habitat loss, pathogens, and disease, accelerating population declines²⁰.

All-Ireland Pollinator Plan (AIPP)

The All-Ireland Pollinator Plan (AIPP) has been successful in mobilising cross-sectoral action across the island of Ireland and in embedding pollinator conservation within communities, as reflected in the growing prevalence of pollinator-friendly green spaces and seasonal no-mow areas. This momentum positions the AIPP 2026–2030 to play a valuable role in supporting the delivery of Article 10 of the NRR.

However, while the AIPP is an effective engagement and coordination framework, it is not designed to deliver the scale of change required to halt and reverse pollinator declines at a national level. The majority of the actions referenced under the AIPP in the draft NRP rely on encouraging improved practices among key stakeholders, including local authorities, public bodies, transport authorities, and utilities. This reliance on voluntary uptake is insufficient. The State should take a leadership role by mandating and resourcing coordinated action across all levels of government.

Given its voluntary nature, the AIPP cannot credibly serve as the primary delivery mechanism for Article 10. Reliance on it as such also places an undue burden on the National Biodiversity Data Centre and other participants to compensate for the absence of binding state-led measures.

Recommendations:

- The All-Ireland Pollinator Plan (AIPP) 2026-2030 should be included within the NRP, leveraging its cross-sectoral, island-wide structure and popularity.
- However, the AIPP must be complemented by the introduction of binding, state-led measures. In particular, the State should require the incorporation of enforceable

¹⁹ O’Neill, F.H., Martin, J.R., Devaney, F.M. & Perrin, P.M. (2013) The Irish semi-natural grasslands survey 2007-2012. Irish Wildlife Manuals, No. 78. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht, Ireland.

²⁰ PAN & Beelife (2026) Nature Restoration Regulation: Recommendations for National Restoration Plans

actions aligned with Articles 10 and 11.

Pollinators require more space for nature on farmland

Research has identified that different pollinators need varying amounts of suitable habitat within agricultural landscapes in order to maintain a stable population²¹. Hoverflies, solitary bees and bumble bees need 6, 16 and 18% semi-natural habitat cover respectively, while butterflies require suitable semi-natural habitat across 37% of agricultural landscapes.

Under the EU Common Agricultural Policy (CAP) 2023-2027, Ireland's Strategic Plan requires farmers to maintain at least 4% 'Space for Nature' (non-productive features like hedges, walls, scrub, and watercourses) on their land to comply with GAEC 8 conditionality. This commitment is reiterated in the National Biodiversity Action Plan 2023-2030. Participation in the voluntary Space For Nature eco-scheme rewards higher levels, with 7% qualifying for one measure, while 10% counts as two measures. The Space for Nature Ecoscheme is the most popular measure with farmers with over 100,000 farmers opting into the scheme in 2023 and 2024. UCD research estimates on average 12-14% of Irish farmland already qualifies as Space for Nature, Teagasc found that intensive beef, dairy, and tillage farms average 5-7%.

These figures show that while the vast majority of farms support important space for nature, the average amount of habitat on farms is well below the thresholds needed by solitary bees, bumble bees and butterflies. The commitment within the National Biodiversity Action Plan²² that by 2030, at least 4% of agricultural land has biodiversity rich landscape features, is also well below the EU Biodiversity Strategy for 2030²³ goal of 10% high-diversity landscape features in agricultural areas. The Kunming-Montreal Global Biodiversity Framework (GBF), Target 10 references a 10% threshold of semi-natural/natural habitat per km² as a minimum to sustain ecosystem functions like pollination and pest control within production systems. Research indicates that below this habitat level in agricultural landscapes, nature's contributions to people, such as pollination collapse, risking food security²⁴.

Recommendation: Pollinators require greater space for nature on farms than is currently supported through CAP eco-schemes.

- Conditionality linked to the retention of habitats on farms must be retained and strengthened within future Irish CAP Strategic Plans and other relevant policies.

²¹ [Critical habitat thresholds for effective pollinator conservation in agricultural landscapes | Science](#)

²² Department of Housing, Local Government and Heritage. (2023). *Ireland's 4th National Biodiversity Action Plan 2023-2030*. Government of Ireland. Available at:

<https://www.gov.ie/en/publication/9e86e-irelands-4th-national-biodiversity-action-plan-2023-2030/>

²³ European Commission. (2020). *EU Biodiversity Strategy for 2030: Bringing nature back into our lives*.

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. COM(2020) 380 final, 20 May 2020. Brussels. Available at:

https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en

²⁴ https://biodiscovery.earth/wp-content/uploads/2022/09/T10_brief.pdf

- The commitment within the National Biodiversity Action Plan²⁵ that by 2030, at least 4% of agricultural land has biodiversity rich landscape features, should be increased. This is still too low for most pollinators.
- A higher average Space for Nature across Irish agricultural land should be targeted through the incentives within eco-schemes and agri-environmental schemes.
- Best practice advice on habitat management on farms should be taught to farmers through relevant courses, peer to peer learning and through initiatives like Farming for Nature and the Bride Project.

Recommendation: A review of CAP interventions should be carried out to evaluate what changes are needed in Ireland’s CAP strategic Plan post 2027 to ensure the pollinator obligations in Article 10 and Art 11 are achieved.

Pollinators need better quality habitat on farmland

Pollinators also require good habitat quality in addition to quantity. Research shows²⁶ that habitats with more flowering plants host more pollinators of all groups than areas with fewer flowers and that wild flowers that are common on Irish farms are important for a large number of pollinators²⁷. Boosting plant and floral diversity can increase pollinator populations, improving habitat quality can help to offset a lack of habitat quantity²⁸, but best results being achieved by increasing both quantity and quality of habitat²⁹.

Most Irish native plant species (56%) have declined in range and abundance or both³⁰. Grassland habitats have been affected the most with re-seeding, over-fertilising, nitrogen deposition, herbicides, drainage and changes in grazing pressure all contributing to the decline in plant species. These pressures need to be addressed to increase native plant diversity for pollinators.

Recommendations: Agri-environmental schemes and knowledge exchange should promote best practice habitat management of Space for Nature on farms to increase the quality of floral resources for pollinators.

- On farmland field margins, hares corners, or fallow areas should be managed to provide year-round foraging for pollinators.

²⁵ Department of Housing, Local Government and Heritage. (2023). *Ireland's 4th National Biodiversity Action Plan 2023–2030*. Government of Ireland. Available at:

<https://www.gov.ie/en/publication/9e86e-irelands-4th-national-biodiversity-action-plan-2023-2030/>

²⁶ <https://www.science.org/doi/10.1126/science.adr2146>

²⁷ [Conserving diversity in Irish plant-pollinator networks » All-Ireland Pollinator Plan](#)

²⁸ <https://pubmed.ncbi.nlm.nih.gov/38923557/>

²⁹ <https://www.science.org/doi/10.1126/science.adr2146>

³⁰ Stroh, P.A., Walker, K.J., Humphrey, T.A., Pescott, O.L., & Burkmar, R.J. (2023). *Plant Atlas 2020: Mapping changes in the distribution of the British and Irish flora*. Princeton University Press / Botanical Society of Britain and Ireland. ISBN: 9780691247595. 1528 pp.

- On tillage land cover crops like mustard, clover, or vetch should be included in rotations to provide in-crop flowers while improving soil health.
- Maintain flowering hedgerows with native species (hawthorn, blackthorn, bramble, ivy). Cut hedges on a 3-year rotation, no more than one-third annually, to promote flowering. Time trimming November–February after fruiting.
- Ireland should develop a targeted National Hedgerow Restoration Framework within, with measurable national targets for hedgerow extent, ecological condition, connectivity, restoration of degraded hedgerows, and establishment of new native hedgerows.
- Allow wildflowers in non-cropped zones like laneways, drains or riparian setbacks.

Rare pollinators need prioritisation when selecting habitats for restoration

Rare plants and habitats play a crucial role in supporting specialist pollinators, particularly Ireland's red-listed species, many of which depend on rare semi-natural and Annex I habitats like machair and species-rich grasslands. Species such as the Great Yellow Bumblebee (*Bombus distinguendus*) exhibit strong ties to specific habitats, requiring targeted restoration to halt declines driven by habitat loss and fragmentation. Other examples include the Cryptic Bumblebee (*Bombus sylvarum*) linked to coastal dunes and fens, and various solitary bees tied to Annex I habitats such as limestone pavements or raised bog.

Article 4's restoration (4.1), re-establishment (4.4), connectivity (4.10) targets, for Annex I habitats offer a prime opportunity to take into account the conservation needs of threatened pollinators when prioritising sites for restoration, maximizing co-benefits for pollinator recovery under Article 10.

Recommendation: Rare red-listed pollinators which are associated with Annex I habitat that are subject to restoration (4.1), re-establishment (4.4), connectivity (4.10) within Ireland's Nature Restoration Plan should be taken into account when identifying habitats for priority restoration up to 2030.

Reduce the use and risk of pesticides

Scientific studies robustly link pesticides, especially neonicotinoids, pyrethroids, and organophosphates, to pollinator declines through lethal and sublethal effects on mortality, foraging, reproduction, immunity, and navigation.

Recommendations:

- Incorporate binding pesticide reduction targets into the Nature Restoration Plan, aligned with the National Biodiversity Action Plan's target to reduce by 50% the use and risk of pesticides by 2030, prioritising neonicotinoids, pyrethroids, and organophosphates.

- Ban relevant pesticides in pollinator-safe zones around Annex I habitats and within semi-natural areas on agricultural land, including Space for Nature features.
- Promote Integrated Pest Management (IPM), prioritizing non-chemical methods like biological controls and habitat enhancements to minimize pollinator exposure while maintaining agricultural yields.
- Develop a new national action plan for sustainable pesticide use, imposing severe restrictions on sales and applications outside professional contexts, especially in high-risk areas like schools, domestic gardens, campuses, and parks.
- Establish a presumption against pesticide use by public bodies, covering local authorities (parks/playgrounds), HSE (health centres), schools, OPW sites, and similar estates (while maintaining flexibility for necessary herbicide use for the eradication of invasive plant species).
- Mandate enhanced mitigation measures for pesticides, biocides, and plant protection products, particularly in agricultural settings, to protect pollinators from cumulative exposure.
- In line with the recommendation of the IAC - Introducing severe limitations on the sale and use of pesticides for outside of professional use, particularly where there is a significant risk to the health of pollinators and people, such as in schools, domestic gardens, campuses, parks etc.

Agricultural Ecosystems: Art 11

Article 11 - Restoration of agricultural ecosystems: Requires Member States to put in place restoration measures to achieve targets for two indicators for agricultural ecosystems, the common farmland bird index and organic soils in agricultural use.

Art 11 (1) additional restoration measures for agricultural ecosystems

Art 11(1) requires that Member States put in place the restoration measures necessary to enhance biodiversity in agricultural ecosystems, in addition to the restoration measures that are required for habitats and species under Art 4. In doing so Member States must take into account climate change, the social and economic needs of rural areas and the need to ensure sustainable agricultural production in the Union.

CAP Alignment post 2027

CAP accounts for 75–80% of Ireland's biodiversity expenditure. Ireland's flagship agri-environmental scheme, ACRES, alone allocates €1.5 billion to over 50,000 farmers. The CAP

post 2027 must continue to deliver ambitious nature restoration measures and strong regulation and conditionality to contribute to the national effort to restore agricultural ecosystems. Any backsliding on environmental ambition in CAP would seriously undermine the objectives of the NRR.

Recommendations:

- The next Common Agricultural Policy (CAP) post-2027 must integrate fully with the NRR, particularly Article 11, to meet binding restoration targets for agricultural ecosystems while balancing climate adaptation, rural socioeconomic needs, and sustainable production.
- Ireland's future CAP Strategic Plans should explicitly align with Ireland's Nature Restoration Plan (NRP), leveraging CAP's important role in funding farmers to deliver habitat restoration on agricultural lands.
- The Irish government should advocate for mandatory ring-fencing for environmental and climate measures in the CAP 2028-2034 framework, reversing the Commission's proposal to eliminate it.
- The Irish government should advocate for the retention of robust environmental conditionality, rejecting the dilution of Good Agricultural and Environmental Conditions (GAECs) into a flexible "farm stewardship" model that risks a race-to-the-bottom. Maintain EU-wide baselines for soil health, landscape features, water protection, and permanent grassland safeguards (e.g., no ploughing in Natura 2000 sites).
- Align Ireland's CAP Strategic Plans explicitly with the NRP, recognizing DAFM's lead role in the farming elements of the NRP and the CAP's essential role in funding NRR-aligned actions already underway via voluntary schemes.
- Ireland's CAP Strategic Plan should be monitored using key performance metrics that are aligned with the NRR, e.g. the conservation status of habitats, the grassland butterfly index, the quality and quantity of landscape features such as hedgerows.

Art 11(2) indicators for agricultural ecosystems

Under Art 11(2) DAFM proposes selecting (a) grassland butterfly index; and (c) share of agricultural land with high-diversity landscape features, as the national indicators for agricultural ecosystems. Measures must be put in place to achieve an increasing trend at national level of these indicators until the satisfactory levels are reached.

Recommendations:

- We are supportive of the selection of (a) grassland butterfly index; (c) share of agricultural land with high-diversity landscape features, as these two indicators for

agricultural ecosystems will better monitor trends in farmland biodiversity and are complementary to other targets.

- To improve biodiversity in agricultural ecosystems, including pollinators and farmland bird populations, Ireland must move beyond merely protecting existing habitats and recognising their presence under Space for Nature Ecoschemes. It should instead actively enhance habitat quality through a combination of regulation, targeted incentives, and knowledge exchange.

Art 11 (2b) Grassland Butterfly Index

According to DAFM's own reporting five of the seven species included in the Irish Grassland Butterfly Index (GBI) that have sufficient data to establish population trends have demonstrated an average decline of 65% between 2008 – 2023. Not enough data is currently being collected to monitor the population trend for Wall brown (*Lasiommata megera*) and Dingy Skipper (*Erynnis tages*).

The draft NRP states that the NBDC has prepared a proposal to include butterfly monitoring with the pollinator monitoring required for Article 10. It's unclear from this statement if the monitoring they are proposing will address the current data gaps.

Recommendations:

- The number of monitoring sites for Wall brown and Dingy Skipper should be increased to generate sufficient data to detect trends.
- Small Blue (*Cupido minimus*) requires its own dedicated site surveys to monitor population trends.
- The Grassland Butterfly Index should be used as a metric in future CAP Strategic Plans to monitor the effectiveness of relevant biodiversity measures.

Note: We have provided detailed recommendations for Art 10 restoration of pollinator populations, that are relevant to the delivery of increasing trends at national level for the Grassland Butterfly Index.

11 (2a) share of agricultural land with high-diversity landscape features

These features refer to non-productive, biodiversity-enhancing elements integrated into farmland including buffer strips, hedgerows, individual or groups of trees, tree rows, field margins, patches, ditches, streams, small wetlands, terraces, cairns, stone walls, small ponds and cultural features, are elements of permanent natural or semi-natural vegetation present in an agricultural context which provide ecosystem services and support for biodiversity.

Recommendations:

- DAFM must urgently finalise its long-overdue review of the EIA Agriculture Regulations (SI 456/2011). The review, was initiated in June 2023, to address critical gaps exposed since the 2011 regulations were introduced following the 2008 EU Court judgment (C-66/06). The current regulations are insufficient to protect semi-natural habitats and landscape features such as hedgerows.
- DAFM should eliminate the 500m screening threshold for hedgerow removal and ensure that all landscape features are strictly protected as a condition to CAP payments. This would align national policy with the NRR requirement for increasing trends in the share of agricultural land with high-diversity features like hedgerows and CAP GAEC 8 requirement for the retention of landscape features for all direct payment recipients.
- Conditionality and agri-environmental measures in Ireland's CAP Strategic Plan post 2027 must ensure that enhanced protection for land scape feature in tandem with incentives to encourage the creation of new farmland habitats will in combination deliver increasing trends.
- Ireland should commit not only to protecting existing hedgerows but to restoring the ecological functionality of the national hedgerow network by increasing its extent, condition, and connectivity across agricultural landscapes, while delivering biodiversity net gain.
- Ireland should develop a targeted National Hedgerow Restoration Framework, with measurable national targets for hedgerow extent, ecological condition, connectivity, restoration of degraded hedgerows, and establishment of new native hedgerows.

Art 11 (3) Common Farmland Bird Index

Measures must be put in place to achieve an increasing trend in the Common Farmland Bird Index at national level until satisfactory levels are reached. It tracks population changes in common farmland bird species, primarily through citizen science monitoring, to assess progress in restoring farmland biodiversity amid agricultural intensification.

Key Issues with CFB Index

Masking biodiversity loss: The CFB Index can mask biodiversity loss, as for example population increases in common generalist species can offset declines in rare habitat specialists, underrepresenting losses tied to habitat loss and degradation. For example, in an Irish context the loss of wetland and peatland habitats could result in an increasing score in the CFB index, given its bias toward common generalist species associated with improved agricultural land.

Ireland's species diversity is low, but highly specialised, which is driven by our geological history, our history of biodiversity loss, climate and isolation. Ireland is fortunate to have

large areas of peatlands but their low nutrients and wet and open landscapes create a challenging environment for species.

Limited Species Coverage: Many national indices use few species. In the case of Ireland only 14 are used, as defined by BirdWatch Ireland's Countryside Bird Survey. Of these 10 are considered common/generalist species and only Kestrel (*Falco tinnunculus*) and Yellow Hammer (*Emberiza citrinella*) are Red listed Birds of Conservation Concern in Ireland.

Shifting Baseline and Trend Problems: Baselines often start from already-declined points (e.g., 1990 or 2000), so short-term increases may not restore historic abundance and could misleadingly signal success amid ongoing long-term losses.

Monitoring Limitations: Reliance on volunteer-based surveys introduces inconsistencies for rare species and under-samples specialized habitats, limiting reliability in diverse landscapes.

Recommendations:

- Expand Monitoring for Scarce Specialists - The CFBI's 14 common species excludes rarer farmland birds like Curlew, Lapwing, Grey Partridge, and extinct Corn Bunting due to low occurrence (<30 CBS squares/year). The CFBI must include these rare / specialist farmland birds to avoid masking true biodiversity losses. This is particularly important given Ireland's very limited list of species.
- Agri-Environment Measures and habitat restoration should prioritise the need to restore populations of rare / specialist species taking into account the requirements of Art 4(7), the Birds Directive and Ireland's Prioritised Action Framework.

Art 11 (4) Restoring & Rewetting Organic Soils

Under Art 11(4) of the NRR measures must be put in place which shall aim to restore organic soils in agricultural use constituting drained peatlands and a subset of these soils shall be rewetted. The targets within NRR Art 11(4) present an opportunity to collectively improve the management of peatlands and organic soils as a nature-based solution to halt biodiversity loss, support climate change adaptation, resilience and mitigation all the while supporting the wellbeing of communities living in peatland landscapes.

This element of the NRR dominated the national debate on the adoption of the NRR disproportionately. While the idea of rolling back on generations of land management is understandably an emotive issue, it is our assessment that in fact the NRR's targets are overshadowed by the scale of necessary ambition emanating from national climate policy. At a national level there are numerous policies such as the Ag Climatise Road Map and the Climate Action Plan's which have established targets for reduced management intensity and rewetting of organic soils. The EPA synthesis report of Phase I of the Land Use Review found that only scenarios that included ambitious organic soil rewetting (up to 90% of drained organic soils considered) achieved net zero by 2050.

The issue is therefore not whether water table management on organic soils is necessary but how we can utilise the momentum created by the NRR to address the concerns of farmers and peatland communities and what measures need to be taken to encourage participation in voluntary schemes.

Scope: Under Art 11.4 Ireland is obliged to put in place measures which shall aim to improve the management of organic soils in agricultural use constituting drained peatlands; with two separate incremental targets set for implementing restoration measures and rewetting. The scope of the land area nationally covered by these targets is based on the area of organic soils in agricultural use constituting drained peatlands, without distinction based on drainage effectiveness.

Based on the work of Tuohy et al (2023) DAFM have created a new category of land that they have named “rewetted area”. Claiming that poorly drained land is “rewetted” would greatly reduce the scope of the level of their ambition under the NRR. Such a position would run counter to the NRRs legal obligations. Under the NRR, rewetting is defined based on the 2006 IPCC Guidelines for National Greenhouse Gas Inventories as: *“Rewetting is the deliberate action of raising the water table on drained soils to re-establish water saturated conditions, e.g. by blocking drainage ditches or disabling pumping facilities”*. This distinction is highlighted in the EPA’s most recent National Inventory of Greenhouse Gas Emissions which states that the Tuohy et al (2023) categorization of drained land is *“separate to the rewetting of organic soils as described in the IPCC Wetlands Supplement.”*

Therefore the scope of the NRRs obligations are all organic soils in agricultural use constituting drained peatlands and rewetting is an intentional progressive land management process rather than a defined water table height. Only fully rewetted soils should be excluded from the requirements of Art 11(4). There remains a major discrepancy between the area reported as drained organic soils in agricultural use constituting drained peatlands nationally (Table 1) and the figures included in the draft National Nature Restoration Plan 2026 (Table 2).

Recommendation: The NRP must base the national target for the management and rewetting of organic soils on the legal requirements of the regulation not on definitions created by DAFM / Teagasc that are not aligned with the NRR.

Table 1: Environmental Pillar calculation of NRR Art 11(4) obligations based on 339,000 ha of drained organic soils in agricultural use constituting drained peatlands

Estimated national cover (3390 km2)	2030	2040	2050
Restoration (ha)	1017	1356	1695
Of Which: Rewetting (ha)	254.25	451.95	564.94

Table 2: DAFM calculation of NRR Art 11(4) obligations taken from Ireland’s draft National Nature Restoration Plan 2026

Estimated national cover (1410 km2)	2030	2040	2050
Restoration (ha)	423	564	705
Of Which: Rewetting (ha)	105.75	141	176.25

We believe that only fully rewetted soils should be exempted from the requirements of the NRR. In order to achieve the 2050 target across 339,000 ha of land Ireland would need to rewet 23,494ha in addition to the 33,000ha that will be achieved through the rehabilitation of peat extraction sites by 2030. Ireland has ample opportunity to deliver additional rewetting though the restoration of afforested peatlands in public ownership and existing policy commitments within the National Climate Action Plan for 2030, which include 80,000ha of grassland on drained organic soil being subject to reduced management intensity and 65,900ha of peatland restoration.

Note: According to the indicative map of peat soil within the draft NRP where restoration measures could be implemented, parcels above 150m elevation are excluded. There is no legal basis to remove farmed organic soils over 150m from the requirements of Art11(4), this would exclude large areas that fall within the scope of the regulation.

Recommendations:

- To reduce greenhouse gas emissions in the land use sector Ireland should look to simultaneously achieve both ambitious rewetting targets and peatland restoration.
- If Ireland is to avail of the flexibilities within the NRR to offset ambition on organic soils in agricultural use then the peatlands identified for restoration and rewetting should take into account ecological criteria and look to maximise synergies with Art 4 by providing benefits for relevant habitats and species, for example the restoration of public forests on deep peat to peatland in areas adjacent to Annex I peatlands.
- The NRP cannot use elevation criteria to exclude organic soils from the requirements of Art 11(4).
- Ireland should not invoke the derogation under Article 11(4) to reduce the proportion of land to be rewetted below the levels specified in Article 11(4)(a), (b), and (c). As rewetting on private farmland is dependent on voluntary participation through agri-environmental schemes, and does not necessarily entail full rewetting of land, there is no reasonable basis to assert that it would result in adverse impacts on infrastructure or the wider public interest.

Peatlands, when fully rewetted, deliver enhanced Biodiversity and Ecosystem Services to society, supporting biodiversity and providing improved water quality, flood mitigation, and carbon sequestration. Moreover, a more extensive restoration effort could unlock opportunities in green sectors, such as eco-tourism and sustainable land management practices. By ensuring rewetting across a greater area of peatlands and farmed organic soils Ireland can ensure a prudent investment, minimizing emissions and maximizing ecological function, setting a benchmark for environmental stewardship, driving down greenhouse gas emissions, and securing long-term environmental and economic resilience.

However while the ecosystem services provided will accrue to society, private land owners will likely only participate in significant numbers if the appropriate, voluntary long-term schemes are put in place to incentivise their participation. Moving forward it is clear that greater effort must be invested in explaining the realities of water table management, its implications and opportunities for land managers.

Recommendations:

- It is essential that farmers and rural communities are central in shaping and driving all of the measures related to the sustainable management of organic soils. Communities and landowners must be involved in decision making through early and sustained engagement. Wherever possible management interventions should look to deliver multiple environmental and social benefits and reward practitioners for the ecosystem services provided.
- In order to counter the negative perceptions around rewetting the government should support awareness campaigns that demonstrate what water table management means for landowners and communities and highlight best practice examples. This could include information campaigns focused on LIFE demonstration sites, BnM raised bog restoration project (pre PCAS), PCAS, Living Lab Lighthouses under the EU Horizon, A Soil Deal for Europe, and past and ongoing EIPs such as FarmPEAT and Farm Carbon Transitions, respectively.
- Building on the success of projects like Farm Carbon and Farm PEAT European Innovation Partnership Schemes, new long-term agri-environmental schemes should be put in place which will provide farmers with results based schemes that incentivise sustainable management of organic soils and peatland restoration.
- Funding should be put in place to support communities, NGOs and private landowners to become the custodians of their local peatlands and wetlands, building on best practice examples such as Abbeyleix Bog Project, Carrownaggapul LIFE, Scohaboy Bog, Ballydangan Bog and the Community Wetlands Forum.
- The State must lead from the front on peatland restoration by delivering ambitious nature restoration projects on publicly owned peatlands including the restoration and

rehabilitation of peatlands and cutover bogs owned by Bord Na Móna and the restoration of legacy forestry on deep peat owned by Coillte.

Improving Agricultural Practices

Burning

Burning on peat soils releases carbon, damages peatland habitats, and can worsen river ecology, while wildfires also destroy nests and other wildlife. While illegal burning is subject to monitoring and enforcement in Ireland, concerns remain about the consistency and effectiveness of enforcement, including the extent of staffing and the frequency of prosecutions. There is a strong case, as supported by Teagasc, for no burning on active or degraded blanket bog, raised bog, wet heath, and grassland. If burning is considered at all on dry heath, it should only be used as a last resort, subject to licensing, prior approval, and strict spatial and seasonal controls. Mechanical heather cutting or other non-burning methods should be encouraged as safer alternatives where management is needed.

Recommendations:

- Based on the available evidence there is an overwhelming case that no burning should take place on both active and degraded Blanket bog, Raised bog, Wet heath and on grasslands.
- There should be a requirement for no drainage, no burning and sustainable stocking densities on grazed Blanket Bog and Wet Heath.
- If burning is allowed on Dry Heath it should only be undertaken if it is subject to licensing.
- In some contexts natural succession and ultimately native woodland re-establishment are the most ecologically appropriate land use and should be supported. The use of firebreaks may assist succession where regular gorse fires are an issue.
- A new licensing system should require that any burns are in line with best practice and are subject to prior approval by the relevant authorities and have spatial and temporal controls to ensure that deep burns do not cause damage to the soil. Relevant authorities DAFM / NPWS should be properly resourced to ensure effective enforcement, clear accountability and continuous update of best practices.

Sustainable Grazing

In the interest of farming peatlands and semi-natural habitats sustainably, grazing pressure should be kept at sustainable levels to prevent erosion, peat loss, and biodiversity decline. Grazing should be seasonal and carefully managed, with winter grazing on blanket bog avoided where possible. In severely degraded areas, complete destocking should be considered if habitats do not improve under management.

Recommendations:

- The density of livestock and deer on blanket bog should be maintained at sustainable levels.
- Blanket bog should not be grazed between the start of November and the end of February.
- Consideration should be given to supporting the use of precision livestock management such as virtual fencing and a return to more mixed summer grazing in the uplands with suitable / traditional breeds of cattle and horses.
- Complete destocking should be considered where peatland areas have shown no improvement following management. Responsibility for destocking should be held by DAFM and NPWS.

Forest Ecosystems: Art 12 / Art 13

Article 12 requires Member States to enhance the biodiversity of forest ecosystems, and achieve increasing trends at national level in the common forest bird index, and in at least 6 of 7 key indicators by 2030 and every 6 years thereafter until satisfactory levels are reached.

The right tree, in the right place, under the right management can benefit climate, biodiversity and water quality while also generating space for recreation and reflection and supporting sustainable employment. However, the opposite also holds true, with poorly planned afforestation resulting in greenhouse gas emissions, biodiversity loss, pollution and negative socio-economic impacts on affected communities. Commercial forestry in Ireland is a significant threat and pressure on protected habitats and species. Ireland's forestry system remains overly dependent on clear-felled, single-species commercial plantations, leaving it increasingly exposed to the impacts of climate change, disease, and pests. It is critically important that future afforestation is compatible with the obligations and the spirit of the NRR.

Ensuring alignment between Forestry Programmes and the NRP

The current Forestry Programme predates the NRR and therefore there is misalignment with the obligations for native woodland restoration and re-establishment under Art 4 and the restoration of forest ecosystems under Art 12. The relevant authorities must ensure these issues are addressed urgently as well as ensuring that future Forestry programmes are fully

aligned with the NRP. Investing in improving the conservation status of native woodland and expanding and connecting the most important habitat fragments in tandem with a transition towards more sustainable forest management and Close to Nature Silviculture will help to deliver on the obligations of the NRR.

Recommendation: Where possible the mid-term review of the Forestry Programme should integrate the requirements of the NRP, with quantified targets cross-referenced to NRR. Enabling actions would include the removal of certain criteria for eligibility for the Native Woodland Scheme, including elevation and productivity criteria.

Recommendations: The design of Forestry Programmes post-2027 must ensure alignment with the NRR obligations:

- Expand Native Woodlands: Prioritising native woodland restoration, re-establishment and enhanced connectivity.
- Include NRR aligned native woodland schemes to pay private landowners attractive premiums for afforestation and woodland management, including the expansion of FT5 programme with increased payments and targeted landscape actions.
- Update procedures to allow for easier conversion of old plantations into native woodland, allowing for natural regeneration and deprioritise stem per ha/ count in native woodland creation.
- Accelerate the transition to sustainable forest management: Set ambitious targets for native broadleaves, Continuous Cover Forestry (CCF) and Close-to-Nature Silviculture.
- Increased payments for agroforestry around woodland areas to increase ecosystem function, reduce edge effect and enhance connectivity.
- Phase out clear-felling and dependency on insecticides, prioritising natural regeneration and ecological corridors on public lands (Coillte estate).
- Address Legacy and Environmental Impacts: Prioritise the restoration of afforested peatlands, starting with legacy plantations on deep peat which are in public ownership (Coillte).
- The State should proactively identify sites where native woodlands can be expanded or re-established to deliver nature-based solutions for flood risk management and to reduce landslide risk. Strategic siting is essential to maximise the protective benefits of woodland creation.
- Rewilding should be adopted as a practical, landscape-scale approach to facilitating the natural regeneration of native woodlands. Addressing key constraints on regeneration, especially grazing, restoration of hydrology and burning, is the most cost-effective way to ensure the ongoing improvement and non-deterioration of sites subject to native woodland restoration and re-establishment.

Art 12 indicators for forest ecosystems

Art 12 (2) Forest Bird Index

Measures must be put in place to achieve an increasing trend in the Forest Bird Index at national level until satisfactory levels are reached.

BirdWatch Ireland under a tender arrangement with NPWS collates data for Article 12 via I-WeBS (Irish Wetland Bird Survey) which is the national monitoring scheme for over 50 bird species and CBS (Countryside Bird Survey) which tracks the population trends of common and widespread breeding bird species.

These surveys do not currently lead to the production of a common forest bird index. To create a bird index, species are selected and classified according to habitat types. For a Forest Bird Indicator, it is crucial to choose specialist and generalist species that are reflective of their habitat and serve as adequate bio-indicators. In this case the focus of interest is in species that are reflective of native forest conditions in Ireland. Ireland has one of the poorest native woodland covers in Europe. Therefore, data provided solely by the Countryside Bird Survey (CBS) would primarily reflect generalist bird species and specialists in non-focal habitats. As a result, species in decline such as forest specialists will be masked by generalist species which are much more adaptable. The long-established CBS may be utilised to produce a forest bird index. However, the addition of periodic targeted forest bird surveys would strengthen the indicator as it would increase the representation of forest specialists in their focal habitat. This use of supplemental data has been applied in the UK's Forest Bird Indicator e.g. national capercaillie surveys and would ultimately provide a better indication of native forest condition in Ireland.

Recommendation: Introduce a Forest Bird Index based on the feasibility study produced by BirdWatch Ireland in August 2025 with the addition of targeted forest surveys.

Art 12 (3) Forest Ecosystems Indicators

Under Art 12(3) an increasing trend must be achieved in at least six out of seven indicators for forest ecosystems, chosen on the basis of their ability to demonstrate **the enhancement of biodiversity of forest ecosystems**. As the stated intent is to enhance the biodiversity of forest ecosystems the NRP must ensure that the selection of indicators and the implementation of measures is consistent with the objective of enhancing biodiversity.

Recommendations:

- We support the DAFM proposal to select the following six indicators, excluding (e) stock of organic carbon. The six proposed indicators will be more effective at enhancing the biodiversity and ecological integrity of forest ecosystems:
 1. standing deadwood;
 2. lying deadwood;
 3. share of forests with uneven-aged structure;
 4. forest connectivity;
 5. share of forests dominated by native tree species;

6. tree species diversity

- Additional spatial analysis is required in order to establish the forest connectivity indicator and track changes over time. The implementation of forest connectivity should prioritise enhancing native woodland connectivity where it will deliver connectivity between habitats falling under Art 4 (7) and Art 4(10). Priority should be given to enhancing the connectivity of most important native woodland habitat (Designated sites and ALEW) and the habitats of species which are particularly vulnerable to fragmentation such as Lesser horseshoe bat (*Rhinolophus hipposideros*), Pied flycatcher (*Ficedula hypoleuca*) and Purple Hairstreak (*Neozephyrus quercus*).
- Enhancing the connectivity of Annex I native woodland should be done in a holistic way that takes into account the potential loss and fragmentation of other important Annexed habitats or the habitats of species which fall under Art 4(7). An example would be the need to restore, re-establish and re-connect the habitat of open habitat specialists like Hen harrier (*Circus cyaneus*).
- Use NFI protocols to track annual deadwood volume trends, ensuring at least six indicators (including deadwood, uneven structure, connectivity) show uplift by 2029 via remote sensing and plot surveys.
- Given the prevalence of overgrazing a key threat / pressure on native woodlands new monitoring metrics should be introduced to record natural regeneration and grazing impact.

Strict protection and the Old-growth forests of the future

The ultimate goal of native woodland conservation and forest ecosystem restoration should be to create the Old-growth forests of the future. Old-growth forests are biodiversity hotspots due to their structural complexity, multi-layered canopies, deadwood, and diverse microhabitats that support rare, threatened species unable to thrive in younger forests. They host irreplaceable habitats for specialised species, while fostering high species diversity through stable, undisturbed conditions unmatched by managed plantations and young or disturbed woodlands. Creating old-growth forests typically requires 150-500 years or more without major disturbances like harvesting or fire. This long timeline arises from gradually increased structural complexity, species diversification and the accumulation of veteran trees and deadwood. Old-growth woodlands will naturally ensure increasing trends in the six forest ecosystem indicators.

As highlighted in the NRR the EU Biodiversity Strategy for 2030 sets out a commitment to legally protect a minimum of 30 % of land and sea, of which **at least one third should be**

under strict protection, including all remaining primary and old-growth forests (emphasis added).

Recommendations:

- The NRP should set out a strategy that will ensure that all Ancient or Long-established Woodland (ALEW) are strictly protected, prioritising designated woodlands for initial strict protection (Ancient Woodland (continuously wooded pre-1600 or 1660, per Down Survey) or Long-Established Woodland (wooded since 1830–1844 OS maps, no planting evidence) are provided with strict protection).
- Strategic Expansion from High-Conservation Value Native Woodlands - Ireland's Nature Restoration Plan should prioritise identifying clusters of high conservation value native woodlands, using criteria like Annex I habitats, Ancient and Long-Established Woodland (ALEW), and proximity ($\leq 500\text{m}$), then expand restoration outward from these core areas. Target "low-hanging fruit" such as the native woodland already on public lands (Coillte, NPWS, Bord na Móna) plus those adjacent within 200m, and Coillte's Bioclass sites for biodiversity. This enables rapid, landscape-scale re-establishment of old sessile oak woods and alluvial forests without private land complexities.
- Expansion from High-Conservation Value Native Woodlands should ideally be achieved through natural regeneration, creating buffers around identified ALEW where natural regeneration is facilitated.
- The assisted expansion of ALEW should only be done under certain conditions, and should use seed collected from the ALEW, raised in local nurseries, and established using applied nucleation as the preferred planting method.
- Commercial plantations on ALEW sites, especially on public lands, should be prioritised for native woodland restoration and licenses for commercial reforestation should not be granted. Integrated management between owning body and NPWS should come in to effect to restore sites in an appropriate ecological manner.

Balancing Natural and Semi-Natural Habitat Restoration

The NRR sets targets for the restoration and reestablishment of both natural habitats such as woodland, which are the natural climax ecological communities in much of Ireland, and semi-natural habitats which have been shaped by our ongoing relationship to the land over millennia. Both are an intrinsic part of our natural and cultural heritage and we must simultaneously meet our obligations to restore Annex I habitats. The NRP should for the first time create a high-level strategic approach to how we restore different habitats simultaneously at a national and landscape level. Scientifically backed data must be collected and analysed by experts to enable authorities to manage trade-offs, ensuring that there is no net loss of habitat nationally and that work undertaken is ecologically appropriate for the current and future climate predictions that will occur.

In the case of native woodlands it is important that we recognise their historical distribution in our uplands and their importance for biodiversity and as a provider of nature based solutions. However, the ad hoc restoration of native woodlands risks driving further decline in semi-natural upland habitats such as grasslands, dry and wet heath. In addition, existing legal protection for these semi-natural habitats in tandem with outdated forestry productivity requirements, such as productivity and altitude restrictions, create a challenging environment for communities trying to restore native woodlands. Many of these designations are established using baseline data of habitats that were already in a state of degradation or suffered from historical clearances.

The NRP should establish a high-level strategy for coordinated habitat re-establishment at national and landscape scales using ecological expertise to ensure appropriate restoration works are being enacted with long term benefits for nature and people. Authorities could explore no-net-loss within habitat re-establishment projects, allowing compensation at a national level where losses occur in one area, to ensure favourable conservation status for all habitats and species. Additionally, future climate change scenarios should be taken into account when planning habitat re-establishment.

Recommendations:

- Develop a collaborative strategy with ecologists, experts, civil society, and communities to strategically review the state of uplands in Ireland and develop potential landuse models that ensure sustainable future for nature and communities.
- Remove altitude and productivity restrictions from native woodland schemes.
- Proactively map upland areas suitable for woodlands without Annex I conflicts, such as non-designated areas and extensive bracken or gorse stands.
- Incentivise tree-friendly land use in areas where ecological succession is possible and appropriate - such as switching from sheep farming to cattle farming.
- Develop schemes for hill farmers and commonages that reward shareholders for ambitious habitat re-establishment.
- Prioritise semi-natural habitat restoration where feasible in key areas like Hen Harrier SPAs and on deep peat soils to balance objectives.

Enhancing standing and lying deadwood in an ecologically coherent way

Standing and lying deadwood are key stages in a trees lifecycle and are a cornerstone of forest biodiversity, hosting up to 30% of European forest species, especially saproxylic invertebrates, fungi, and cavity-nesters, that rely on its decay stages for food, shelter, and reproduction. This structural legacy creates microhabitats absent in living timber, driving nutrient cycling, soil enrichment, and carbon storage while stabilizing ecosystems against disturbances. It is critical that achieving increasing trends in standing deadwood and lying deadwood are done in a way that enhances the biodiversity and resilience of forest ecosystems, rather than locking in unsustainable exploitation.

Recommendations:

- Prioritise strict protection of ALEW, to accelerate deadwood trends while ensuring the relevant Art 12 indicators are delivered in a way that enhances biodiversity.
- To achieve increasing trends in standing and lying deadwood, the NRP should prioritise setting mandatory targets in forest management plans, for example:
 1. Set targets for an increasing percentage of felled stems to be retained as lying and standing deadwood in both public and private forests.
 2. Set targets for the retention of veteran old trees, prioritising native species.
 3. Ensure that mature trees within biodiversity areas are not commercially exploited but allowed to go through their full life cycle.
 4. Promote native woodland conservation and Close to Nature Silviculture in public forests.

Deer management

Overgrazing by both native and invasive deer species is a key threat and pressure on a number of protected habitats and in particular native woodlands.

Recommendation:

- The Irish Deer Management Strategy, developed in 2023 by the Irish Deer Management Strategy Group (IDMSG), should be implemented in full.
- Deer management must be underpinned by clear targets and data on the density per km² (less than 1/2 per km² for native broadleaf regeneration) and / or natural regeneration such as new stems per ha.
- NPWS and Coillte should produce deer management strategies for the public lands they manage and work with all relevant stakeholders and adjacent landowners to manage deer numbers.
- Deer management moving forward should reflect invasive status, for example the new classification of Sika (*Cervus nippon*) as an Invasive Alien Species (IAS) of Union Concern. This update adds it to the official Union list under Regulation (EU) No 1143/2014. Non-native invasive deer species should be prioritised for control ahead of native species such as Red Deer (*Cervus elaphus*) in National Parks while acknowledging the need to maintain the population of even native and naturalised herbivores. A proactive approach should be taken to monitoring for Muntjac (*Muntiacus muntjak*) and Water Deer (*Hydropotes inermis*), in order to prevent these invasive species from becoming established.

- The Forest Service should continue to improve efforts to make deer fencing more affordable for private landowners under the forest strategy and money should be prioritised to long term management.
- Funding should be made available for full time and effective deer stalking measures and necessary research. Deer licensing and training hubs should be established regionally.

Invasive Plant Species

Non-native invasive plant species are a key threat and pressure on native woodlands in Ireland. Should prioritise invasive species control as a core restoration action, integrating with existing frameworks like the 4th National Biodiversity Action Plan.

Recommendations:

- Target high-priority non-native plants (e.g., Rhododendron ponticum, Cherry Laurel, Japanese Knotweed) for systematic removal in native woodland SACs and pNHAs by 2030, using mechanical, chemical, and biological methods where feasible.
- Mandate pre- and post-intervention monitoring with baseline surveys completed by end-2026, focusing on woodland hotspots such as woodland recorded under Art 17, ALEW and Native Woodland surveys.
- Strengthen biosecurity, prohibiting untreated habitat material movement near woodlands and requiring Check-Clean-Dry protocols for forestry and landscaping activities.
- Update planning guidelines to ban non-native plant sales/planting within 500m of native woodlands and enforce IAS risk assessments for afforestation permits.
- Work with the tree nursery sector to ensure that future demand for trees and shrubs under future Forestry and CAP programmes is supplied by Irish suppliers. Steps taken should include more accurate forecasting of demand for tree nurseries. Local nurseries providing local provenance saplings for each ALEW would protect genetic diversity and boost local economies. Moving forward the establishment of bioregions would protect local genetic biodiversity.

Article 13 sets an EU-wide commitment for Member States to collectively plant at least 3 billion additional trees by 2030.

Recommendations:

- When contributing to the commitment of planting at least three billion additional trees by 2030 at Union level, Ireland should only report those native tree species which planted since the NRR came into effect.
- Planting must follow ecological principles: prioritise native species, ensure diversity in species and age structure, and enhance ecological connectivity in an ecologically appropriate way (i.e. applied nucleation where suitable or allowing natural regeneration). We need to plant for connectivity and not just the adhoc afforestation of blocs of trees.
- Focus on sustainable afforestation (Close to Nature Silviculture, CCF, Agroforestry), reforestation, tree planting, and urban greening to support restoration targets under Article 12 (forests).

APPENDICES

Table 3.a. Habitats and species in each ISRA designated within the Irish maritime area

Area name	Habitats present (relevant Annex II habitat in green)	Qualifying species (relevant Annex III species in red)	Supporting species (relevant Annex III species in red)	Link to factsheet	Overlap with other area-based designations
Achill Island ISRA	mudflats, sandflats, flat sloping bedrock with small patches of cobbles and boulders, and diverse biotic communities of red algae, brown algae,	Basking shark (<i>Cetorhinus maximus</i>)	Tope (<i>Galeorhinus galeus</i>) Spiny Dogfish (<i>Squalus acanthias</i>) Angel Shark (<i>Squatina squatina</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2-EuropeanAtlantic/Achill-Island-2-EuropeanAtlantic.pdf	

	and rare sponges (NPWS 2013). EUNIS codes: insufficient data		Flapper skate (<i>Dipturus intermedius</i>) Small-eyed Skate (<i>Raja microocellata</i>) Spotted Skate (<i>Raja montagui</i>) Undulate Skate (<i>Raja undulata</i>)		
An Mhuir Cheilteach ISRA	offshore circalittoral sand, rock and biogenic reef, coarse sediment, rock and biogenic reef, and mud (EMODnet 2025). within the area is a transitional waterway with a large freshwater influence. EUNIS codes: MD32; MC32; MB32; MC52; MD52;	Basking Shark (<i>C. maximus</i>) Blue Shark (<i>Prionace glauca</i>)	Tope (<i>G. galeus</i>) Porbeagle (<i>Lamna nasus</i>) Starry Smoothhound (<i>Mustelus asterias</i>) Smallspotted Catshark (<i>Scyliorhinus canicula</i>) Nursehound (<i>Scyliorhinus stellaris</i>) Spiny Dogfish (<i>Squalus acanthias</i>) Flapper Skate (<i>D. intermedius</i>) Blonde Skate (<i>Raja brachyura</i>) Thornback Skate (<i>Raja clavata</i>) Small-eyed Skate (<i>R. microocellata</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2EuropeanAtlantic/An-Mhuir-Cheilteach-2EuropeanAtlantic.pdf	Ballycotton Bay and Ballymacoda Ramsar Sites (Wetlands of International Importance; Ramsar 2025a, 2025b).

	MC62; MD62		Spotted Skate (<i>Raja montagui</i>) Great Torpedo Ray (<i>Tetronarce nobiliana</i>)		
Barra- Donegal Fan Complex ISRA	mostly soft substrate, with deep circalittoral coarse sediment, muddy, and sandy substrates on the shelf edge (JNCC 2014). On the continental slope there are also rocky substrates in addition to gravel, sand, and mud (JNCC 2014). EUNIS codes: ME62, ME32	Leafscale Gulper Shark (<i>Centrophorus squamosus</i>) Kitefin Shark (<i>Dalatias lichia</i>) Velvet Belly Lanternshark (<i>Etmopterus spinax</i>) Tope (<i>G. galeus</i>) Common Smoothhound (<i>Mustelus mustelus</i>) Sail Roughshark (<i>Oxynotus paradoxus</i>)	Common Blue Skate (<i>Dipturus batis</i>) Flapper Skate (<i>D. intermedius</i>) Norwegian Skate (<i>Dipturus nidarosiensis</i>) Longnosed Skate (<i>Dipturus oxyrinus</i>) Sandy Skate (<i>Leucoraja circularis</i>) Shagreen Skate (<i>Leucoraja fullonica</i>) Rabbitfish (<i>Chimaera monstrosa</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2-EuropeanAtlantic/Barra-Donegal-Fan-Complex-2-EuropeanAtlantic.pdf	
Bay of Angels ISRA	diverse benthic habitats, including native oyster beds, Zostera	Angelshark (<i>Squatina squatina</i>) Common stingray	Basking Shark (<i>C. maximus</i>) Tope (<i>G. galeus</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2-EuropeanAtlantic	Tralee Bay and Barrow Harbour Key Biodiversity Area (KBA; KBA 2025)

	<p>seagrass meadows, biogenic reefs, maerl beds, and mixed sediments (NPWS 2013). The bay hosts subtidal and intertidal seagrass beds, which enhance primary productivity and support rich benthic communities (NPWS 2013).</p> <p>EUNIS codes: MB2222; MB121</p>	<p>(<i>Dasyatis pastinaca</i>)</p> <p>Thornback Skate (<i>R. clavata</i>)</p> <p>Undulate Skate (<i>R. undulata</i>)</p>	<p>Bluntose Sixgill Shark (<i>Hexanchus griseus</i>)</p> <p>Porbeagle (<i>L. nasus</i>)</p> <p>Starry Smoothhound (<i>M. asterias</i>)</p> <p>Blue Shark (<i>P. glauca</i>)</p> <p>Smallspotted Catshark (<i>S. canicula</i>)</p> <p>Nursehound (<i>S. stellaris</i>)</p> <p>Spiny Dogfish (<i>S. acanthias</i>)</p> <p>Blonde Skate (<i>R. brachyura</i>)</p> <p>Small-eyed Skate (<i>R. microocellata</i>)</p> <p>Spotted Skate (<i>R. montagui</i>)</p> <p>White Skate (<i>Rostroraja alba</i>)</p>	<p>atlantic/Bay-of-Angels-2EuropeanAtlantic.pdf</p>	<p>and the Tralee Bay Ramsar Site (Wetland of International Importance; Ramsar 2025).</p>
<p>Blasket Islands ISRA</p>	<p>submarine rocky substrates and biogenic concretions as well as submerged or partially submerged sea caves at the base of</p>	<p>Basking shark (<i>C. maximus</i>)</p>	<p>Tope (<i>G. galeus</i>)</p> <p>Porbeagle (<i>L. nasus</i>)</p> <p>Blue Shark (<i>P. glauca</i>)</p> <p>Nursehound (<i>S. stellaris</i>)</p> <p>Spiny Dogfish (<i>S. acanthias</i>)</p>	<p>https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2EuropeanAtlantic/Blasket-Islands-2EuropeanAtlantic.pdf</p>	<p>This area overlaps with the Kerry National Marine Park (Páirc Náisiúnta na Mara, Ciarraí; NPWS 2025) and Blasket</p>

	<p>many of the cliffs</p> <p>EUNIS codes: MC32; MC52; MD52; MB121, MD32, MC62, MD62</p>		<p>Common Stingray (<i>D. pastinaca</i>)</p> <p>Thornback Skate (<i>R. clavata</i>)</p> <p>Spotted Skate (<i>R. montagui</i>)</p>		<p>Islands SAC (NPWS 2013)</p>
<p>Carlingford Lough & Dundalk Bay ISRA</p>	<p>intertidal flats that extend 3 km offshore, as well as salt marshes and eelgrass beds (AQUAFAC T 2011; NPWS 2025). Carlingford Lough contains 15 km of intertidal mud and sandflats, supporting habitats like salt marshes and infralittoral muds.</p> <p>EUNIS codes:</p>	<p>Tope (<i>G. galeus</i>)</p>	<p>Starry Smoothhound (<i>M. asterias</i>)</p> <p>Nursehound (<i>S. stellaris</i>)</p>	<p>https://sharkrayareas.org/portfolio-item/carlingford-lough-and-dundalk-bay-isra/</p>	<p>The area overlaps with the Dundalk Bay Ramsar Site (Wetland of International Importance; Ramsar 2025).</p>

	MB32; MB62; MC62; MB52; MD62; MD42; MB42; MD52; MC32; MD32				
Galway Bay ISRA	mosaic of benthic habitat types and island features, including rock, gravel, fine sand, sandy mud, and deep mud substrates. The shallower waters include numerous estuarine inputs as well as many tidal inlets and lagoons scattered along the coastline supporting salt marsh areas. The sublittoral zone contains distinctive	Porbeagle (<i>L. nasus</i>)	Basking shark (<i>C. maximus</i>) Tope (<i>G. galeus</i>) Blue Shark (<i>P. glauca</i>) Smallspotted Catshark (<i>S. canicula</i>) Nursehound (<i>S. stellaris</i>) Spiny Dogfish (<i>S. acanthias</i>) Angelshark (<i>S. squatina</i>) Thornback Skate (<i>R. clavata</i>) White Skate (<i>Rostroraja alba</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2-EuropeanAtlantic/Galway-Bay-2-EuropeanAtlantic.pdf	The area overlaps with four Key Biodiversity Areas (KBAs): Aran Islands (parts), Cliffs of Moher, Connemara Islands, and Inner Galway Bay (KBA 2025a, 2025b, 2025c, 2025d).

	<p>communities such as some of the most diverse seaweed</p> <p>communities in Ireland, maerl beds, seagrass, and oyster beds (NPWS 2013)</p> <p>EUNIS codes: MB42; MB62; MB32; MC42; MC62; MC223; MB2222; MB52; MC32; MD62; MC52; MD32; MD52</p>				
Hy-Brasil ISRA	<p>raised area on the Irish continental shelf, ~200 km west of Ireland. The area is characterised by seamounts midway long the</p>	<p>Blackmouth Catshark (<i>Galeus melastomus</i>)</p> <p>Bluntnose Sixgill Shark (<i>H. griseus</i>)</p>	<p>Black Dogfish (<i>Centroscyllium fabricii</i>)</p> <p>Portuguese Dogfish (<i>Centroscymnus coelolepis</i>)</p> <p>Longnose Velvet Dogfish (<i>Centroselachus crepidater</i>)</p>	<p>https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2EuropeanAtlantic/Hy-Brasil-2EuropeanAtlantic.pdf</p>	

	<p>main channel</p> <p>(NPWS 2024a). The benthos is characterized by black, soft and gorgonian corals, as well as sponges (including encrusting forms), desmospongia, and glass sponges (NPWS 2024b). The substrate in the north of Hy-Brasil is dominated by hard ground, with small areas of soft sediment. The southern part of the area has soft sediment with occasional boulders and pebbles. Throughout the bank there are terraces, cliffs,</p>		<p>Kitefin Shark (<i>Dalatias licha</i>)</p> <p>Birdbeak Dogfish (<i>Deania calceus</i>)</p> <p>Arrowhead Dogfish (<i>Deania profundorum</i>)</p> <p>Great Lanternshark (<i>Etmopterus princeps</i>)</p> <p>Velvet Belly Lanternshark (<i>E. spinax</i>)</p> <p>Tope (<i>G. galeus</i>)</p> <p>Atlantic Sawtail Catshark (<i>Galeus atlanticus</i>)</p> <p>Common Smoothhound (<i>M. mustelus</i>)</p> <p>Nursehound (<i>S. stellaris</i>)</p> <p>Spiny Dogfish (<i>S. acanthias</i>)</p> <p>Common Blue Skate (<i>D. batis</i>)</p> <p>Flapper Skate (<i>D. intermedius</i>)</p> <p>Norwegian Skate (<i>D. nidarosiensis</i>)</p> <p>Longnosed Skate (<i>Dipturus oxyrinchus</i>)</p> <p>Sandy Skate (<i>L. circularis</i>)</p>		
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	overhangs, and boulders (NPWS 2024a). EUNIS codes: ME62, ME42		Cuckoo Skate (<i>Leucoraja naevus</i>) Blue Pygmy Skate (<i>Neoraja caerulea</i>) Thornback Skate (<i>R. clavata</i>) Spotted Skate (<i>R. montagui</i>) Rabbitfish (<i>C. monstrosa</i>) Opal Chimaera (<i>Chimaera opalescens</i>)		
Malin Head and Lough Swilly ISRA	This nearshore zone includes rocky headlands, intertidal reefs, sandy bays, and subtidal habitats, and it transitions gradually from the terrestrial environment into the broader shelf sea. The seabed comprises primarily of coarse sediments,	Basking shark (<i>C. maximus</i>) Tope (<i>G. galeus</i>) Thornback Skate (<i>R. clavata</i>)	Porbeagle (<i>L. nasus</i>) Starry Smoothhound (<i>M. asterias</i>) Blue Shark (<i>P. glauca</i>) Nursehound (<i>S. stellaris</i>) Spiny Dogfish (<i>S. acanthias</i>) Common Blue Skate (<i>D. batis</i>) Flapper Skate (<i>D. intermedius</i>) Spotted Skate (<i>R. montagui</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2EuropeanAtlantic/Malin-Head-and-Lough-Swilly-2EuropeanAtlantic.pdf	This area overlaps with the Trawbeaga Ramsar Site (Wetland of International Importance; Ramsar 2025).

	<p>gravels, and exposed bedrock, with finer sands and muddy substrates found in more sheltered areas, especially in inlets like Lough Swilly (Connor et al. 2004). The inner lough supports extensive mudflats and sandy benthic habitats, while the outer reaches contain rocky subtidal areas and moderate current flows (JNCC 2004).</p> <p>High energy circalittoral rock, coarse sediment, fine sand and muddy</p>				
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	<p>sand, sandy mud; infralittoral fine sand and muddy sand; Oyster beds on shallow sublittoral muddy mixed sediment; kelp (EMODnet 2025)</p> <p>EUNIS codes: MC52; MD62; MC62; MB2222; MB52; MC32</p>				
Northwest Irish Sea ISRA	<p>The area is characterised by fine sediment, including muddy-sandy substrates.</p> <p>EUNIS codes: MD62; MD42; MD52</p>	Spiny Dogfish (<i>S. acanthias</i>)	Tope (<i>G. galeus</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2EuropeanAtlantic/Northwest-Irish-Sea-2EuropeanAtlantic.pdf	
Porcupine	The benthos is characterised by black,	Portuguese Dogfish (<i>C. coelolepis</i>)	Sandy Skate (<i>L. circularis</i>)	https://sharkrayareas.org/wp-content/uplo	

<p>Bank ISRA</p>	<p>soft, and gorgonian corals, as well as sponges (including encrusting forms), desmospongia, and glass sponges (NPWS 2024b). The substrate in the north of the Porcupine Bank is dominated by hard ground, with small areas of soft sediment. The southern part of the area has soft sediment with occasional boulders and pebbles.</p> <p>EUNIS codes: ME62; MD62; MD42; ME42</p>	<p>Longnose Velvet Dogfish (<i>C. crepidater</i>)</p> <p>Kitefin Shark (<i>D. licha</i>)</p> <p>Velvet Belly Lanternshark (<i>E. spinax</i>)</p> <p>Blackmouth Catshark (<i>G. melastomus</i>)</p> <p>Bluntnose Sixgill Shark (<i>H. griseus</i>)</p> <p>Spiny Dogfish (<i>S. acanthias</i>)</p> <p>Common Blue Skate (<i>D. batis</i>)</p> <p>Flapper Skate (<i>D. intermedius</i>)</p> <p>Norwegian Skate (<i>D. nidarosiensis</i>)</p>	<p>Cuckoo Skate (<i>L. naevus</i>)</p> <p>Rabbitfish (<i>C. monstrosa</i>)</p>	<p>ads/isra-factsheets/2 EuropeanAtlantic/Porcupine-Bank-2EuropeanAtlantic.pdf</p>	
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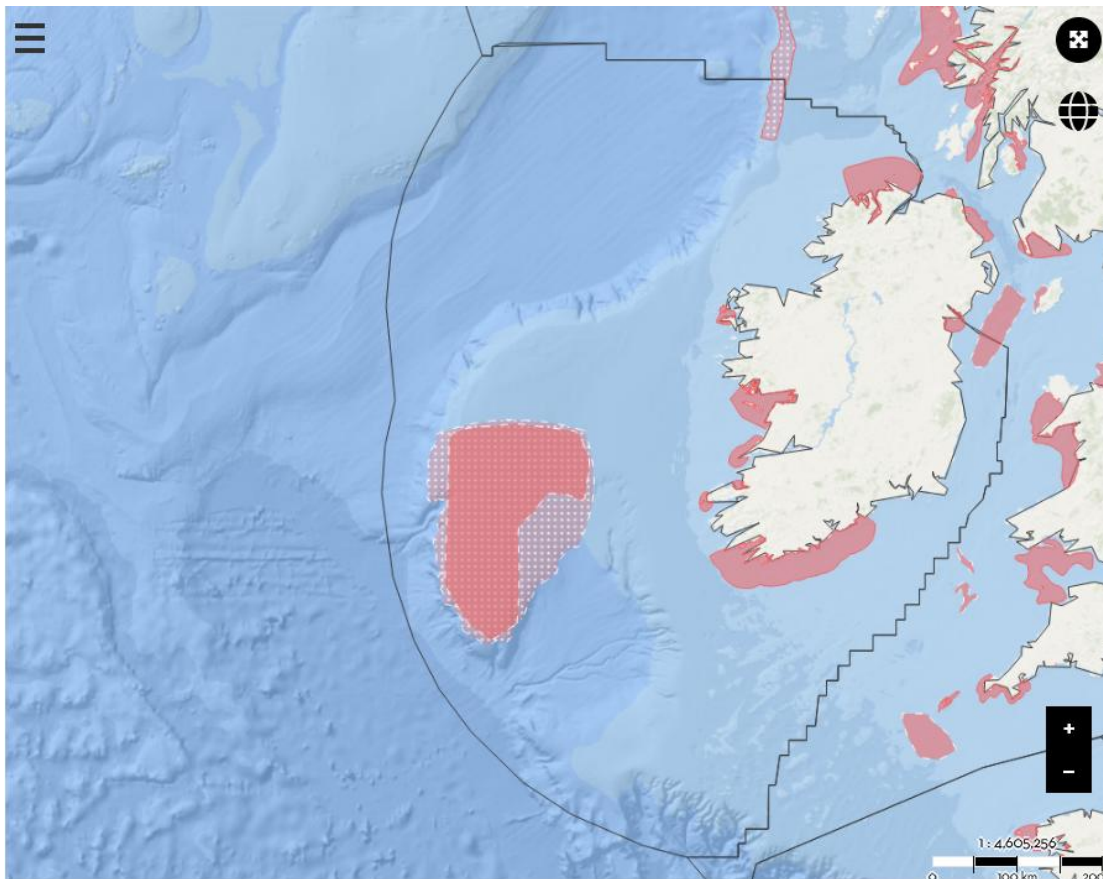
West Coast of Clare ISRA	sheltered estuarine waters, sandy and rocky bays, and prominent headlands. Mixed sediment habitats from rocky to muddy sand EUNIS codes: MC32; MD32; MC52; MC42; MD42	Basking shark (<i>C. maximus</i>)	Tope (<i>G. galeus</i>) Bluntnose Sixgill Shark (<i>H. griseus</i>) Porbeagle (<i>L. nasus</i>) Blue Shark (<i>P. glauca</i>) Nursehound (<i>S. stellaris</i>) Spiny Dogfish (<i>S. acanthias</i>) Common stingray (<i>Dasyatis pastinaca</i>) Thornback Skate (<i>R. clavata</i>) Spotted Skate (<i>R. montagui</i>)	https://sharkrayareas.org/wp-content/uploads/isra-factsheets/2-EuropeanAtlantic/West-Coast-of-Clare-2-EuropeanAtlantic.pdf	
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Table 3.b. Habitats in each Area of Interest (see <https://sharkrayareas.org/e-atlas/>), species listed under Annex III are highlighted in red.

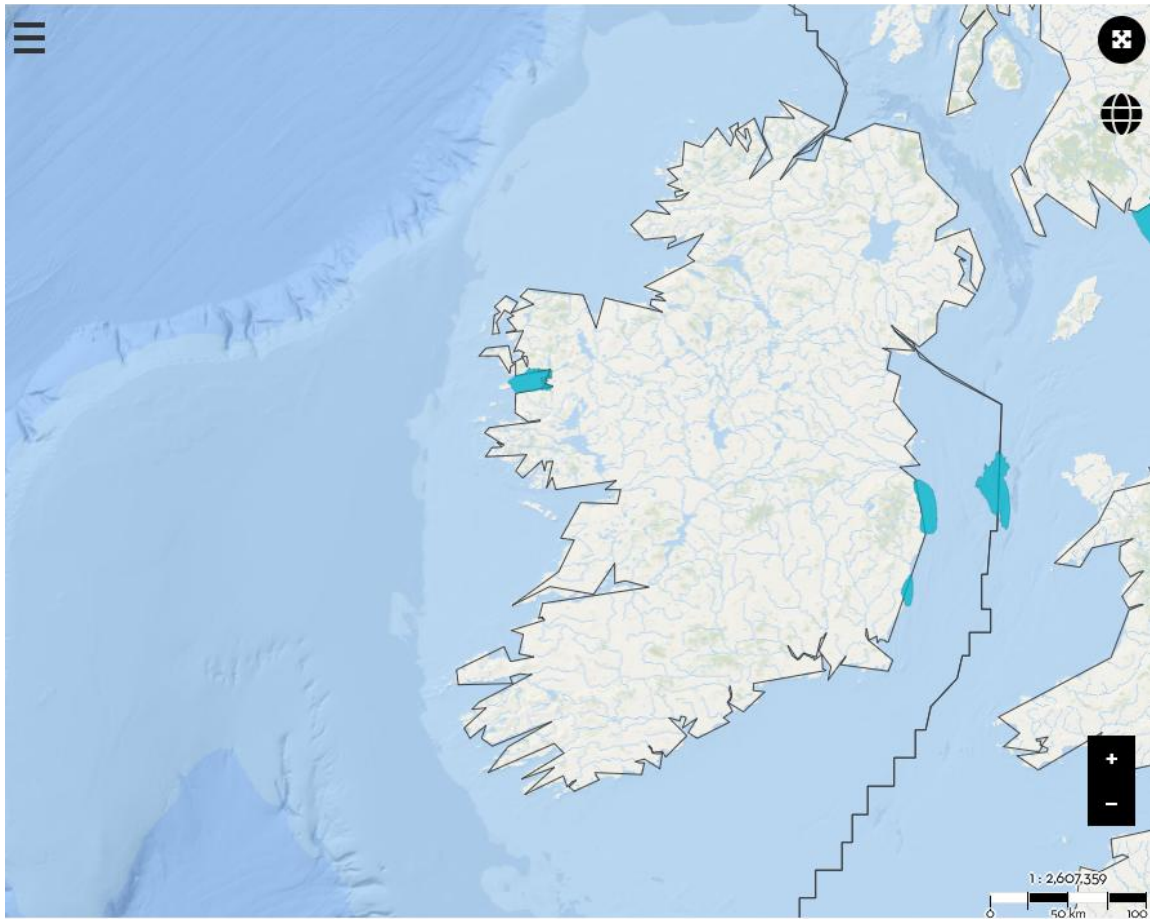
Area name	Habitat	Species
Clew Bay AOI	Sand, muddy sand, consolidated sediment, Laminaria, intertidal flats EUNIS codes: MB222; MB32; MC32; MC52; MC62; MB62; MB121	Flapper Skate (<i>D. intermedius</i>)
Wicklow AOI	The area is characterised by sand, gravel, and rocky substrates, and contains multiple high-relief sandbanks.	Tope (<i>G. galeus</i>)

	EUNIS codes: MC32; MD52; MC52; MC42; MB52; MD42; MB32	
Loch Garman AOI	The area is characterised by sand, gravel, and rocky substrates, and contains multiple high-relief sandbanks. EUNIS codes: MC62; MC52; MC32; MD52	Starry Smoothhound (<i>M. asterias</i>) Tope (<i>G. galeus</i>)
The Peaks AOI	located on the continental shelf with substrate of a largely sandy/gravel mix, generally coarser at depth. EUNIS codes: MD42; MD52	Angelshark (<i>S. squatina</i>) Tope (<i>G. galeus</i>)

ISRAs



AOIs



Spatial layers can be requested from <https://sharkravareas.org/resources/isra-spatial-layers/>