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Submission to the Citizens Assembly on  
Biodiversity Loss  
September 2022

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## Introduction to the Water Forum

The Water Forum is the national statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. It consists of 25 members including representatives from a wide range of organisations and sectors with interests in water issues including the environmental sector, the rural and agriculture sector, consumers including customers of Irish Water, the rural water sector, river trusts, angling and water sports, the business sector, trade unions, the community and voluntary sector, forestry, education, social housing and tourism. Approximately 50 different organisations were involved in the nomination of members

Set up under the Water Services Act 2017, the Forum has advisory roles in relation to the Minister for Housing, Local Government and Heritage, Irish Water, the Commission for Regulation of Utilities and the Water Policy Advisory Committee.

The role of the Forum is to provide a platform for stakeholder engagement and dialogue on all matters relating to water as an environmental, economic and social asset. Stakeholders debate and analyse a range of issues with regard to water quality, rural water services, issues of concern to Irish Water customers, the implementation of the Water Framework Directive (WFD) and the River Basin Management Plan (RBMP) for Ireland. We provide a strong independent voice on policy pertaining to water quality, water conservation and future proofing.

Over the past number of years, the Water Forum has commissioned research to inform positions and engaged with experts and agencies to develop policy positions on matters pertinent to water management. ***Many of those positions are also relevant to biodiversity loss and management and to the considerations of the Citizen's Assembly on biodiversity loss.***

In 2020, we made a submission to the Department of Housing, Local Government and Heritage (DHLGH) on the need to develop a Framework for Integrated Land and Landscape Management (FILLM) that identifies the *need for policy coherence and collaborative approaches to the management* of catchments to account for the benefits and trade-offs for water, biodiversity, climate mitigation and adaptation and soil health. To further inform the Forum's understanding of policy coherence, in 2021, we commissioned research, 'An Assessment of Policy Coherence and Conflicts for Water and Environmental Management'. This research report might be a useful resource for members of the Citizens Assembly. FILLM is explored further in Section 1.

*Invasive Alien Species (IAS) are a driver of biodiversity loss* and a threat to native biodiversity, biosecurity, the economy, and animal, plant and human health. As an island, Ireland has the opportunity to prevent myriad IAS arriving and establishing. In 2020, in accordance with the objectives of our Strategic Plan 2018-2021, the Forum commissioned research to support the development of policy recommendations in the management of IAS on the island of Ireland. Section 2 below presents this research and the policy recommendations.

As a stakeholder body inputting to policy development, the Water Forum recognises the importance of public engagement in policy development *as a means to promote greater public understanding of, and support for, urgent action in response to the biodiversity emergency* but also the climate crises and the actions required to meet the objectives of the Water Framework Directive. To inform the Forum's position, we commissioned research on 'Public Engagement in Water Governance' and held a webinar with experts to discuss what actions would be required in the 3<sup>rd</sup> River Basin Management

Plan to support real and meaningful public engagement for environmental outcomes for water, biodiversity and climate. These will be discussed further in section 3 below.

## SECTION 1

### The Framework for Integrated Land and Landscape Management<sup>1</sup> – a systems-based approach

We live in an interconnected world. All the components of our natural environment – air, water, ecosystems, soils, rocks, land and landscapes - are interrelated and interlinked. Therefore, management of these components must be undertaken in a cohesive, holistic and integrated manner, with water, climate and environmental policies properly coordinated and aligned to be effective, despite being carried out across different areas and levels of government, and with the participation of many stakeholders.

The Framework for Integrated Land and Landscape Management proposes the adoption of a systems-based approach that enables inclusion of all the relevant aspects air, water, nature, soils, land and landscapes in a cohesive and unified manner. It builds on the Integrated Catchment Management (ICM) approach, that is currently being used in Ireland's River Basin Management Plan 2018-2021 for water resources management, broadening it to include air, soils, climate and biodiversity, while retaining catchments as the appropriate landscape units.

FILLM can be considered as the overarching framework for environmental management providing the means of connecting different policies, such as the Water Framework Directive, Urban Waste Water Treatment Directive, Habitats Directive, Floods Directive, Drinking Water Directive, climate change adaptation and mitigation, soil conservation, spatial planning, and sustainable food and timber production. In this way, it provides an opportunity to achieve *policy coherence and strategic synergies between biodiversity policy and other policy priorities including, but not limited to, economic development, climate action, sustainable development, agriculture and tourism.*

In all environmental spheres, measures and actions are needed to protect our environment where it is satisfactory, while mitigating the impacts where it is under threat or is unsatisfactory. Many of the necessary measures and actions undertaken or planned for one component of the environment can have co-benefits for other components because of the connectedness of nature. Therefore, using a systems-based approach provides an opportunity to adopt environmental management to take account of all the environmental components in an integrated manner as a means of delivering effective and efficient outcomes for the environment and Irish society.

This new approach does not only consider the biophysical elements but also the human dimension. Using this approach provides a basis for a shared vision of land utilisation and management that includes all stakeholders, all human activities and all environmental components. Issues of governance, regulation and the distribution of costs and benefits within society, assume major significance.

The challenge of this approach is the need for change current ways of working whereby experts and specialists tend to work in 'silos'. All relevant public bodies with an environmental remit need to work together to adapt the approach and to address the multi-disciplinary and multi-organisational implications within their environmental management work programmes, to achieve optimum

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<sup>1</sup> [The Water Forum, A Framework for Integrated Land and Landscape Management](#)

efficiency and effectiveness. The necessary resources would have to be provided to facilitate such engagements and outcomes.

### Recommendations for the Citizens Assembly on Biodiversity

The Forum recommends the Framework for Integrated Land and Landscape Management approach is implemented for biodiversity management, as this systems-based approach can prioritise actions for water, climate and nature that have the largest synergetic impact. Implementation of landscape-based approaches requires multidisciplinary and multi-organisational collaborations, as well as environmental policy coherence, integration and implementation. “

The Water Forum requests that the FILLM document is used as a resource to inform Citizen Assembly members deliberations.

The Water Forum’s research report, ‘An Assessment of Policy Coherence and Conflicts for Water and environmental Management’<sup>2</sup> will further support awareness of the need for these approaches.

## SECTION 2

### Management of Invasive Alien Species

Invasive Alien Species (IAS) are global threats to the environment, native biodiversity, biosecurity, the economy, and animal, plant and human health. As an island, Ireland has the opportunity to prevent myriad IAS arriving and establishing. However, as it is acknowledged in the literature that IAS which become established on islands impact native island fauna and flora much more so than on continental land masses, it is predicted that Ireland may suffer particularly severe consequences.

Recognising the urgency of developing management strategies for Invasive Alien Species (IAS) in Ireland, a recent EPA research project on Prevention, Control and Eradication of Invasive Alien Species (Lucy et al 2021) established a suite of practical management strategies for IAS in Ireland. Furthermore, in 2020 the Water Forum commissioned research to address policy gaps surrounding management of IAS in Ireland (Lucy et al., 2021)<sup>3</sup>, which presented ten recommendations for changes in governance and policy that will, if implemented, radically improve IAS management on the island of Ireland and significantly reduce the threat to native biodiversity.

The ten policy recommendations outlined in Lucy et al. (2021)<sup>4</sup>;

1. Establish a suitably resourced, single lead Division that is responsible for Invasive Alien Species (IAS) management in Ireland, working under the aegis of the National Parks and Wildlife Service (NPWS).
2. Establish an All-Ireland IAS Forum.
3. Develop a national Biosecurity Strategy for Ireland.

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<sup>2</sup> [An-Assessment-of-Policy-Coherence-and-Conflicts-for-Water-and-Environmental-Management.pdf \(thewaterforum.ie\)](#)

<sup>3</sup> [Lucy-et-al.-Invasive-Alien-Species-Report\\_Policy-Recommendations-for-their-Management.pdf \(thewaterforum.ie\)](#)

<sup>4</sup> [Invasive-Alien-Species-Policy-Recommendations\\_Policy-Brief.pdf \(thewaterforum.ie\)](#)

4. Provide appropriate resources, training and support in relation to IAS for our national Customs services at ports/entry points throughout Ireland.
5. Produce comprehensive Management Plans for IAS currently in Ireland, along with Contingency Plans for IAS expected to arrive in the future (based on horizon scan exercises).
6. Develop a surveillance programme to regularly monitor water bodies for the presence and status of IAS.
7. The new IAS legislation for Ireland that will come into force in 2021 must be implemented and enforced by the responsible agency.
8. Develop national IAS education and awareness programmes in Ireland.
9. Harness community involvement and support to ensure the long-term sustainability of national and local IAS and biosecurity programmes.
10. Significantly increase the level of research and management funding into IAS.

In the Water Forum's submission to DHLGH on the draft River Basin Management Plan 2022-2027<sup>5</sup>, the Water Forum made the following recommendations in relation to IAS for inclusion in the final plan and believe these are of value to the considerations of the Citizens Assembly.

1. Establish a suitably resourced, single lead Division that is responsible for Invasive Alien Species (IAS) management in Ireland, for example the National Parks and Wildlife Service (NPWS). This single lead division would ensure engagement with and coherence across various Government departments (including DHLGH and DAFM), sectors and agencies.
2. An All-Ireland IAS Forum should be established which would report to the responsible agencies for IAS in Ireland and Northern Ireland. It will bring together national and international IAS experts, scientists, policy makers, practitioners, and stakeholders to advise both jurisdictions regarding IAS and biosecurity management on the island of Ireland.
3. A National Biosecurity Strategy should be developed that includes biosecurity guidelines and plans based on international best practice to encourage good biosecurity practice such as the need for biosecurity declaration forms at ports and entry points. The lack of biosecurity awareness was evidenced with the issues related to the crayfish plague during the second cycle
4. Provide appropriate resources, training and support in relation to IAS for our national Customs services at ports/entry points throughout Ireland.
5. IAS education and awareness programmes should be supported, such as biosecurity campaigns, along with pertinent materials on codes of practice, protocols for use by all stakeholders (garden centres, supermarkets, anglers, water sports industries etc.

#### [Recommendations for the Citizens Assembly on Biodiversity](#)

The Water Forum recommends that the research report 'Invasive Alien Species in Ireland, Policy Recommendations on their Management'<sup>3</sup> and 'Invasive Alien Species, Policy Recommendations Policy Brief'<sup>4</sup> is made available to the members of the Citizens Assembly on biodiversity loss as they have potential to support decision making on this topic.

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<sup>5</sup>[Submission on the Public Consultation of the River Basin Management Plan 2022-2027 \(thewaterforum.ie\)](#)

We recommend that members of the Citizens Assembly on Biodiversity Loss are made aware of the five IAS recommendations made by the Forum to the DHLGH, which are an agreed position of the 25 members of the Forum in relation to the future management of IAS in Ireland.

## SECTION 3

### Deliberative approaches and public participation for transformative change

The FILLM proposes developing a collective vision and strategy in a multi-stakeholder catchment, which, while challenging, is critical to identifying and agreeing priorities and encouraging practice change at local level for environmental outcomes. Desk study research commissioned by the Water Forum on Public Engagement in Water Governance<sup>6</sup>, recommends the inclusion of everyone, all ages, all social categories and all stakeholders and such approaches need to be facilitated at the beginning of the policy cycle and continue through to evaluation of the plan.

Developing and realising such a collective vision requires an engagement process based on the principles of trust, respect and open communication. The objectives of the participation need to be clearly outlined, such as who is participating in the process, what the process involves, the expected outcomes and the next steps<sup>7</sup>.

Truly effective public participation that includes all stakeholders, will bring the social (including political), wellbeing (physical and mental), cultural and economic dimensions to integrated catchment and environmental management. Communities engage in environmental management for a myriad of different reasons such as angling, forestry, heritage, biodiversity protection, recreation, therefore it is essential that a wide range of experts are available to facilitate informed, fact-based discussions<sup>6</sup>.

People are more likely to engage in public participation activities if it is directly relevant to them, therefore at local level. Engagement requires holistic collaboration of disciplines, sectors, different stakeholders and methods of engagement. In the first instance therefore, it is particularly important that statutory agencies, each of whom has a particular and distinctive role, work and communicate closely with one another in formulating a joint agenda, to support such community engagement processes in the context of an integrated approach to catchment and whole-of-environment management.

When engaging with communities in public participatory processes, agencies and stakeholder groups need to identify themselves to ensure equity<sup>6</sup>. The role of the agencies is to provide facts and expert advice, along with facilitating informed discussion. Training in facilitation and information dissemination will be required for providers and flexibility and reflective practice are essential.

In preparation for the Water Forum's submission to the draft River Basin Management Plan, we hosted a webinar to bring experts and practitioners together to discuss public participatory approaches and deliberative democracy for catchment and environmental management. A report<sup>7</sup> is available on the discussions but a key recommendation is that public participation and community engagement outcomes such as plans of action, need to be embedded in a wider democratic system to support

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<sup>6</sup> [https://www.thewaterforum.ie/app/uploads/2020/03/Water-Forum\\_Public-Participation\\_Bresnihan-and-Hesse\\_2019.pdf](https://www.thewaterforum.ie/app/uploads/2020/03/Water-Forum_Public-Participation_Bresnihan-and-Hesse_2019.pdf)

<sup>7</sup> [Webinar-Report-Public-Participation-in-Catchment-Management-March-2022.pdf \(thewaterforum.ie\)](#)

implementation<sup>7</sup>. This can be limited by resources but following on from engagement any community recommendations should be evaluated, and the community needs to be informed of what is actionable and achievable, along with explanations and the reasoning for these decisions.

Structures and resources need to be put in place for scientists, agencies and policy makers to work alongside the people who live and work in the catchment to create a mutual vision, the purpose being to be "of the community" as opposed to imposing "on the community" thereby developing collective ownership and generational stewardship of our natural environment. It also provides *a means to promote greater public understanding of, and support for, urgent action in response to the biodiversity emergency, climate crises and water issues.*

### Recommendations

The Water Forum recommends the research report on Public Engagement in Water Governance is shared with the members of the Citizens Assembly on Biodiversity loss.

It is recommended that the departments and agencies with responsibility for addressing the biodiversity crisis should collaborate with other departments to support a **new national approach to public participation, creating awareness of, and actions for water, biodiversity and climate.**

Transparent, inclusive, participatory approaches are essential to develop legitimate decision-making and reaching agreed outcomes for the transformative change that is needed, particularly at local level.

### Conclusions

The Water Forum would like to thank you for considering our submission and for sharing the research reports and policy documents with the members of the Assembly and hope that our recommendations will be taken on board. We would also be happy to engage with you further should any clarifications be required.

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***Please address any correspondence to:  
Donal Purcell, Senior Executive Officer,  
An Fóram Uisce, Civic Offices, Limerick Road,  
Nenagh, County Tipperary***