

**National Parks and Wildlife Service**

**REPORT OF INTERNATIONAL EXPERT  
COMPARATOR GROUP ON NPWS STAFFING**



## TABLE OF CONTENTS

	Page
Members of the Expert Group	2
Foreword by the Chair	3
1. Executive Summary	4
2. Introduction	6
2.1 NPWS	
2.1.1. Mission and Values	7
2.1.2. Key Strategic Goals and Core Areas of Focus	8
2.1.3. Key Resourcing Challenges	9
2.2 International Comparator Group	
2.2.1. Methodology	11
2.2.2 Assumptions	12
3. Resourcing Requirements	
3.1. Current position up to 2026	13
3.2. 4 Years to 2030 & 3 years to 2033	14
Conclusion and Recommendations	16
APPENDICES:	
1. Terms of reference	22
2. Responsibility Matrix comparisons	25
3. Employee comparison spreadsheet	31
4. Global and EU biodiversity commitments	33
5. Parks Canada	38
6. NatureScot	39

# REPORT

## Chair and members of the NPWS International Expert Benchmarking Group

**Kate Lawler:** Experienced Chair, having over 25 years international knowledge and practice chairing senior decision making boards and acting as a non-executive Director over many years.

Four expert members of the panel to represent comparable international parks and nature conservation sites as well as knowledge and experience of different jurisdictions and financial expertise upon which to benchmark the current and future requirements of NPWS.

**Bill Brake:** Recently retired after 37 years in the Public Service of Canada. Field Unit Superintendent at Parks Canada and a member of the Agency's Executive group for 23 years. Responsible for the management of geographic groups of national parks and national historic sites in various regions of the country, including all associated human and financial resources.

**Jane Macdonald:** Director of Business Services and Transformation in NatureScot, is the strategic lead on organisational transformation and the delivery of excellent business and corporate services. Working collaboratively across the organisation, she and her teams provide the expertise, functions and facilities to empower colleagues to deliver for nature and the people of Scotland. Her focus is on enabling NatureScot, Scotland's nature agency, to be a successful, innovative and inclusive organisation.

**Dr. Micheal O'Briain:** Retired European Commission official who worked on a wide range of EU and international nature and biodiversity policy issues in DG Environment from 1992 to 2021, latterly as Senior Expert and Deputy Head of the Nature Unit. He has worked closely with Ireland and all other EU Member States on implementation of the EU Nature Directives, including on coordinating work on establishment, management and financing of the Nature 2000 protected area network.

**Barry McGrane:** Qualified Chartered Accountant and experienced director and finance professional across a range of international businesses.

## Foreword

I was delighted to be invited to Chair the International Expert Group established to make recommendations on the overall personnel required in the National Parks and Wildlife Service. The work of the NPWS is extremely important and I believe the public are becoming increasingly aware of the NPWS and the significant work it does to protect nature.

The work is also becoming more challenging as we seek to mitigate the loss of habitats and biodiversity and protect remaining habitats. The demands on the NPWS have grown year on year. However, for many years resources reduced or remained stagnant and no organisation can sustain that and continue to evolve and grow. Thankfully there is a strong commitment to the renewal of the NPWS in the current Programme for Government and this review to identify the optimum future staffing complement is an important part of that.

The challenges facing the expert group were numerous. While many organisations do similar work to the NPWS, there is no Agency with its breadth and scope whose tasks range from operational responsibility for the National Parks and Nature Reserves, Scientific Advice and Research, Nature Conservations, Wildlife Protection, Legislation as well as issuing licences and providing policy advice to Government. Land ownership also creates a different dynamic. In many of the countries studied these responsibilities cross a range of Government Departments and Agencies. This made it challenging to ensure that our comparisons were real and that we were making the correct calls. I am now confident that, drawing on all the expertise of this group, we have made appropriate assumptions and judgements to produce a report to assist the NPWS and Government to confidently commit to a resourcing plan which will serve the NPWS, Nature and the people of Ireland well over the next decade.

Thank you to my fellow group members who contributed wholeheartedly to this work and who made themselves available to me at all times to discuss the many complex issues that arose in arriving at our recommendations. Thank you also to the staff of the NPWS who met with us and in particular the staff and management at Killarney National Park who demonstrated some of the practical realities of running a National Park and the wide variety of skills and staff required to do so.

I would like to thank the Management Team of the NPWS, and in particular Ciara Carberry and Malachy Corcoran, for the assistance given to this Group and a special thanks to Claire Hickey who provided a secretariat to the Expert Group and was very helpful in assisting the Group in its work.

---

Kate Lawler, Chair of the Expert Group

August 2023

## 1. Executive Summary

The Programme for Government 2020 set out a commitment to “review the remit, status and funding of the National Parks and Wildlife Service (NPWS), to ensure that it is playing an effective role in delivering its overall mandate and enforcement role in the protection of wildlife”. This review was completed in February 2022, Reflect and Renew, a Review of the National Parks and Wildlife Service – The Kearney Report. The Expert International Comparator Group on NPWS Staffing was established in late 2022 to give effect to Recommendation 6 of the Kearney Report, to “set up an expert group, drawing on international expertise in organisations with a similar remit to the NPWS, to establish the human resourcing requirement of the NPWS on an international, best practice basis.”

The NPWS is undergoing a process of fundamental change, refocus and renewal as the recommendations of the Kearney Report are implemented. This transformation cannot be completed successfully without addressing the resourcing challenge. While resources have been added to the Service since 2020, this work has only brought staffing back to 2008 levels, yet the output expected of the NPWS has increased dramatically over the last decade and a half.

The Expert Group does not believe that the current and future challenges facing the NPWS can be met without significant additional staff across all functions, nor without building capacity in key areas, such as legal, finance, conservation planning, programme and project management, corporate and social engagement, primary and applied research and development. The inability to meet these challenges, in turn, poses significant risks.

The Expert Group has taken as its guide three key milestone dates over the next 10 years against which to measure the resourcing plan. These are:

1. The period to the end of 2026, to align human resourcing levels with comparable organisations in preparation for implementation of Ireland’s global, EU and national legal and policy commitments on biodiversity for 2030 including in relation to the restoration of nature. The final form of any national plan to restore nature is still under negotiation but NPWS will have a central coordination and leadership role in its implementation when agreed.
2. The period from 2026 to 2030 which includes fulfilment of global and EU biodiversity commitments in compliance with legal obligations and delivery of national nature restoration objectives
3. The subsequent three-year period to 2033.

Based on the information available and the expected future additional requirements the human resources within NPWS will need to increase as set out below:

- By the end of 2026 an increase of 210 people (40%) to bring it in line with the level of resources deployed in a range of organisations with similar functions. This is based on the numbers in those organisations; the wider policy remit of the NPWS; the increased complexity of dealing with a broad group of private landowners of protected sites; compliance with EU court of justice rulings on nature legislation; and the additional demands that Ireland's holding of the EU Presidency in the second half of 2026 will place on the NPWS from the second half of 2025. It also takes into account the recent EU Court of Justice ruling in proceedings C-444/21 EU Commission v Ireland, ("the Measures Case"), and the requirement for the NPWS to be in a position to respond to the judgment and put in place the measures necessary to come into compliance.
- A further 158 people will be required in the 4 years to 2030. This will be necessary for NPWS to deliver on Ireland's biodiversity commitments for 2030, including legal commitments under EU and national legislation. As Ireland will need to be in position to demonstrate significant progress on achieving national nature restoration objectives during this period, the years to 2030 will be hugely demanding and will require a further increment of key staff.
- An additional 141 people in the 3 years to 2033. This period should see national nature restoration objectives being given full effect, along with the significant requirements on biodiversity and the other major agenda items facing the NPWS. This period will also require additional staff to meet these demands.

All references to employee numbers in this report are on a full time equivalent (FTE) basis. The cost of the increase in employee numbers set out above is expected to add approximately €10.5 mm to the annual pay bill of the NPWS by 2026, (210 people at €50k per person), a further €8.7 mm to the annual pay bill by 2030 (158 people at €55k per person) and then a further €8.5 mm by 2033 (141 people at €60k per person). It is recommended that the addition of these people to the organisation be spread evenly across each of the three time periods under consideration.

## 2. Introduction

The Programme for Government 2020 set out a commitment to “review the remit, status and funding of the National Parks and Wildlife Service (NPWS), to ensure that it is playing an effective role in delivering its overall mandate and enforcement role in the protection of wildlife”. This review was completed in February 2022, Reflect and Renew, a Review of the National Parks and Wildlife Service – The Kearney Report. The Expert International Comparator Group on NPWS Staffing was established in late 2022 to give effect to Recommendation 6 of the Kearney Report, to “set up an expert group, drawing on international expertise in organisations with a similar remit to the NPWS, to establish the human resourcing requirement of the NPWS on an international, best practice basis.”

This report has been informed by the current context within which the NPWS operates and by the predictable challenges on the horizon which are set out below. These include the Government declaration of a climate & biodiversity emergency in May 2019, relevant commitments in the Programme for Government, global, EU and national biodiversity commitments for 2030, and the recommendation of the Citizen’s Assembly on Biodiversity; all of which impact significantly on the remit and operations of the NPWS.

Ireland is subject to an additional Reasoned Opinion (RO), [INFR(2010)2161, C(2022)6331] which Ireland replied to in November 2022. Ireland has given firm commitments to complete its obligations under the Habitats Directive in relation to Raised and Blanket Bogs.

The continuing response to this RO is in order to ensure compliance with the Habitats Directive together with the required actions necessary to respond to the Measures Case pose significant risk and requires immediate attention. It is the view of the expert group that it is better to invest in staff now and mitigate the risk of future fines and reputational damage. The longer term context includes the implications of the delivery of national nature restoration objectives. NPWS will play a pivotal national coordination role in developing and implementing any National Restoration Plan.

The National Parks and Wildlife Service (NPWS) while a relatively small Executive Agency, has an extraordinarily complex range of responsibilities that include:

- Significant policy advisory and policy-making functions in relation to nature and biodiversity, including engagement on EU and international biodiversity policy;
- A wide range of operational responsibilities including the management of 6 National Parks, 74 Nature Reserves, and a variety of other State lands and associated amenities and educational programmes which are accessible to the public;

- Managing a range of EU programmes, alongside thousands of conservation measures across our designated areas and National Parks; it partners across a range of other conservation interventions;
- A broad scientific remit being the principal coordinator of the National Biodiversity Action Plans, the monitoring of designated sites and Annex habitats and species, while undertaking significant scientific research;
- Being a statutory consultee in relation to planning matters, including county and regional development plans;
- Regulatory, certifying, permitting and licencing functions;
- Administering financial aid and grant schemes to support farm-plans, conservation measures, actions for biodiversity, as well as invasive species control measures;
- Detection, investigation and prosecution of breaches of wildlife legislation.

The NPWS is the lead government body responsible for co-ordinating the delivery of Ireland's national and international commitments to halt and reverse the continuing decline of biodiversity, including commitments under the Convention on Biological Diversity and the EU Biodiversity Strategy for the period up to 2030.

### **2.1.1 NPWS Mission and Values**

Mission of NPWS: The mission of the NPWS is to Protect Nature.

While in a time of unprecedented change, the NPWS of the future will continue to be guided by those core values that have always made the organisation special, being:

- A deep love of nature, and a commitment to its care and safeguarding
- Partnership, teamwork and excellence, and a well-grounded pride in our professionalism and scientific integrity
- A strong identity, and a trusted voice for nature
- Transparency and accountability in our decision making
- Excellence in the service we deliver to the public



## 2.1.2. Key Strategic Goals and Core Areas of Focus

Key strategic goals for the organisation in 2022-25 are:

- Provide excellent scientific advice, to the NPWS, the Minister and the Government to support the protection of nature.
- Drive, support and manage excellence in nature conservation in Ireland.
- Safeguard nature and help prevent wildlife crime through enhanced supports, operations, policies, education and awareness.
- Manage our national parks and nature reserves for nature conservation as well as for education and public access for the enjoyment of nature.
- Delivery of a strong, effective legislative basis for nature protection.
- Develop and deliver excellent internal and external engagement and strong corporate governance and business supports.
- Support nature protection through excellent EU and international engagement.

NPWS core areas of focus:

NPWS have five core areas of focus to achieve their strategic goals.

To support better nature-related decision-making at all levels of Irish society through:

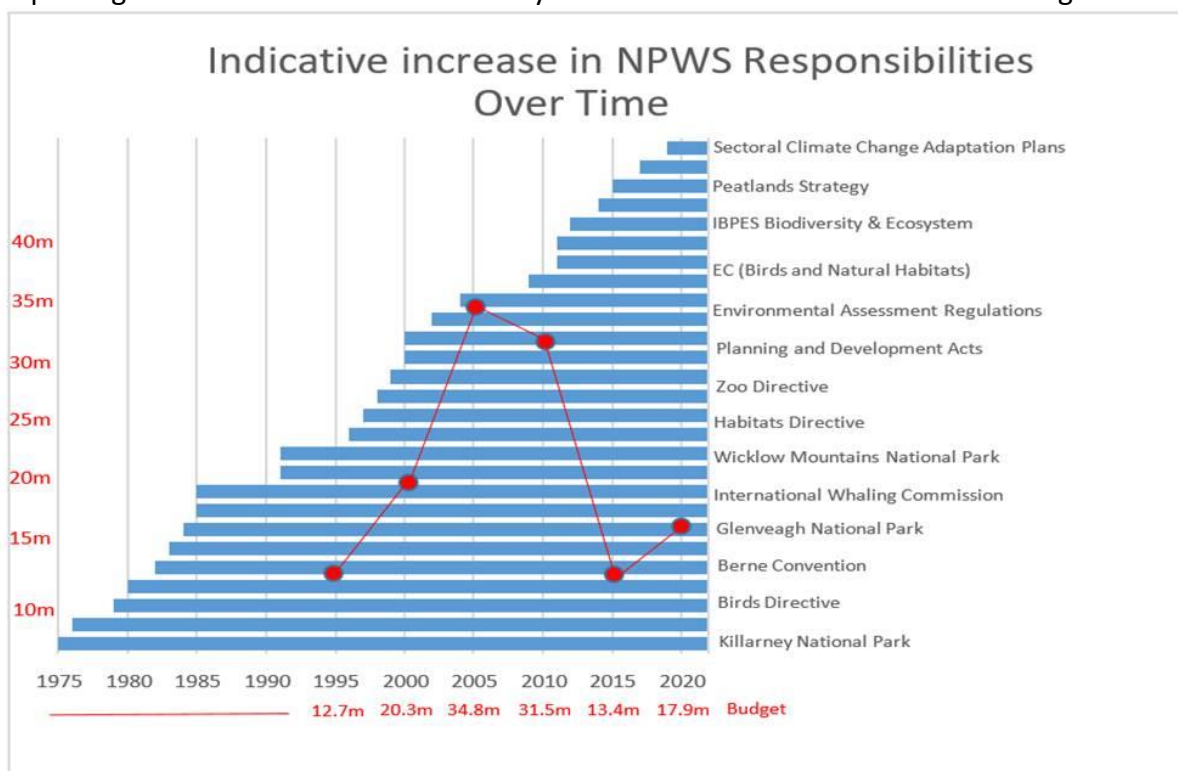
- Enhanced and user-friendly guidance, sharing of best practice, advice, support and enforcement
- Foster community and societal engagement with Nature and Biodiversity, through effective communication, engagement and volunteerism
- Enhance NPWS leadership, workforce excellence and capacity building
- Expand and develop NPWS infrastructure and facilities
- Deliver organisational transformation as set out in the NPWS Strategic Action Plan.

### 2.1.3. Key Resourcing Challenges

The Kearney Report pointed out that while the scope and responsibilities of NPWS have been continually increased the funding and staffing resources have not kept pace with the growth in scope of responsibilities. After the financial crisis (2008), the NPWS annual budget reduced by over 60%, from €34.8 million to €13.4 million in 2015. This reduction in budget allocation is set out in Table 1 alongside the growing responsibilities of the NPWS. This much lower budget allocation persisted, effectively unchanged, until 2020 when budgetary restoration gradually began, with funding only approaching 2008 levels as recently as 2022.

The staffing allocation has been similarly under-resourced over these years. NPWS staff numbers were above 300 in 2007, dipping below 300 after the financial crisis and not exceeding that number again until 2017. While the staffing remained low, and virtually static, the workload of the organisation has expanded greatly over the same timeframe. A 2010 Grant Thornton report recommended the optimal number of NPWS staff required at that time was just under 400. This recommended number was never achieved, and the gap was compounded by a sharp increase in NPWS responsibilities since that date, as shown in the **Table 1** below.

Demands on the NPWS are expected to increase even further as the deadline for the 2030 EU and global goals for biodiversity, climate and sustainable development that Ireland has signed up to gets closer. The Kearney Report also highlighted the ongoing allocation of additional responsibilities to the NPWS without any additional resources as one of the main issues impacting the efficacy of the organisation.



**Table 1**

The under resourcing of the organisation has significantly restricted its ability to manage its responsibilities and comply with EU environmental legislative obligations. This carries substantial reputational and financial risks to the State. There have already been a number of adverse findings against Ireland by the EU Court of Justice for failure to meet Ireland's legal obligations under EU Environmental Directives. A failure by Ireland to meet EU legal environmental requirements has resulted in fines totalling €17 million in one case <sup>(1)</sup> alone.

Further infringement proceedings directly relevant to responsibilities of the NPWS, are being taken against Ireland, which could result in additional penalties being imposed. On 29 June 2023 in the Measures Case, the EU Court of Justice concluded that Ireland failed to designate and establish the necessary conservation measures for Special Areas of Conservation (SACs) under the Habitats Directive based on clearly defined conservation objectives<sup>2</sup>. Complying with this ruling of the Court in a timely manner, and avoiding further fines, will require a major investment in human resources for the NPWS.

Ensuring the protection, management and restoration of Natura 2000 sites is one of a range of EU and international biodiversity targets and commitments for which the NPWS has major responsibilities to ensure Ireland's compliance. A summary of some key EU legal requirements which have significant human resource implications is set out in **Appendix 4**.

---

<sup>1</sup> Case C-261/18 Commission v Ireland (Derrybrien Wind Farm)

<sup>2</sup> Judgement of the EU Court of Justice of 29 June 2023 in Case C-441/21 Commission v Ireland (Protection of Special Areas of Conservation)  
<https://curia.europa.eu/juris/document/document.jsf?jsessionid=9B756CC80491BB2A077E43F54469CC6C?text=&docid=275028&pageIndex=0&doclang=en&mode=lst&dir=&occ=first&part=1&cid=538797>

## 2.2. International Comparator Group

### 2.2.1. Methodology

The Terms of Reference for the International Comparator Group require it to set out the long-term staffing requirement for the organisation over the coming 5 to 10 years, drawing on international expertise in and comparators from organisations with a similar remit to the NPWS. It should also set out the associated financial resourcing requirement and address the timing of up-scaling, given capacity levels and evolving needs. The detailed Terms of Reference are at **Appendix 1** to this report.

To establish the level of human resources required within the NPWS the Expert Group looked at information available from a number of comparator organisations with similar remits to the NPWS. In 2021 the NPWS commissioned Earth System Sciences (ESS) to carry out comparative assessment of the structures, operations and resources employed by other organisations responsible for nature conservation and the implementation of national and international biodiversity obligations in other jurisdictions. This formed part of the Stout & Ó Cinnéide report – A Report to the National Parks and Wildlife Service, of the Department of Housing, Local Government and Heritage, October 2021.

In establishing these comparisons ESS looked at organisations from jurisdictions of a similar biogeographic, political, economic and social context to Ireland. It also looked at organisations from jurisdictions where particular environmental and social challenges affecting biodiversity are or are expected to be of particular concern to Ireland. Invitations to participate were sent to 10 organisations along with a detailed questionnaire. Owing to difficulties associated with the COVID-19 pandemic, completed responses were received on time from organisations representing four countries – England, Sweden, Finland and Denmark. A review of the data provided confirmed that these organisations were reasonable comparisons for the NPWS and they were used in the Stout & Ó Cinnéide report.

The Expert Group included members from NatureScot and Parks Canada as the nature agencies in these jurisdictions were also considered to have a similar remit to the NPWS and were not covered in previous reviews. A comparison of the NPWS with each of these six organisations was undertaken by the Group and is included in **Appendix 2**. Scotland proved to be the most directly comparable to the NPWS and most of the evidence for the recommendations in section 4 comes from Scotland. **Appendix 5** and **Appendix 6** provide further details on the activities of NatureScot and Parks Canada.

In preparing this report the Group also met with the NPWS senior management team, visited the Killarney National Park and invited submissions from NPWS staff. The Group reviewed Reflect and Renew, a Review of the National Parks and Wildlife Service (the Kearney Report, February 2022) and a Report to the National Parks and Wildlife Service, of the Department of Housing, Local Government & Heritage (Stout & Ó Cinnéide, October 2021). The Group included a representative with a detailed knowledge of EU/international biodiversity obligations relevant to the NPWS, a representative from NatureScot and a recently retired senior manager from Parks Canada. The Group reviewed the information provided to Stout & Ó Cinnéide by Natural England, Danish Nature Agency, Swedish EPA and MHNPF (Finland).

### **2.2.2 Assumptions**

In preparing this report the Group had to make a number of assumptions to arrive at its conclusions. The main assumptions used in preparing this report are:

- The information provided to Stout & Ó Cinnéide for England, Sweden, Finland and Denmark relates to the calendar year 2020. As no more up-to-date information is available for these countries it is assumed that this information is still current and can be used for the purposes of this comparative analysis.
- The employee numbers provided for Natural England and the Swedish EPA include part-time employees. The employee numbers used for benchmarking are on a full-time equivalent basis and it is assumed that all part-time employees work 50% of their time for their respective agencies.
- There is not a detailed breakdown of the various budget amounts for each jurisdiction used in the analysis. It is assumed that there are no major one-off items impacting on these budget numbers.
- It is assumed that the NPWS has, or will have, access to the HR capability to recruit the recommended number of people in the timeframe laid out.

### 3. Resourcing Requirements

#### 3.1. Current Position up to 2026

To establish the current level of human resources required within the NPWS the Group looked at information available from a number of comparator organisations with similar remits to the NPWS. The Group included a member from NatureScot and a recently retired senior manager from Parks Canada, and in addition to these jurisdictions, also reviewed available information from Natural England, Danish Nature Agency, Swedish EPA and MHNPF (Finland).

The information for these organisations includes details on:

- the number of employees,
- the annual financial budgets,
- the total national area, and
- the total state protected area<sup>3</sup>

Using this information, a number of metrics were calculated to allow comparison across the various countries. These calculations were done on;

- the budget per km of national area,
- the budget per km of protected area and
- number of employees per 1,000 km of protected area

These calculations are shown in Appendix 3. The average for all these organisations was then compared to the same metrics calculated for the NPWS.

Based on this analysis the current human resources of the NPWS are 33% lower than the comparator organisations. This figure does not take into account the fact that the policy remit of the NPWS is wider than most of the other organisations, the increased complexities of dealing with private landowners for the majority of Ireland's protected sites and the additional demands likely to be placed on the NPWS in the run-up to Ireland's holding of the EU Presidency in the second half of 2026. Allowing for these added dimensions, the Expert Group recommends that the number of staff within NPWS increase by 40% by the end of 2026. The employee numbers in NPWS will need to increase from the current level of 527 full-time equivalents to 737 between now and the end of 2026. The cost of this increase in employee numbers is expected to add €10.5 mm to the annual pay bill of the NPWS by 2026.

---

<sup>3</sup> public and private lands that are designated as protected areas

### 3.2. 4 Years to 2030 & 3 Years to 2033

Increasing the human resources within the NPWS to the level recommended above only brings it in line with where the other organisations reviewed are today. This does not take into account the additional future requirements for NPWS. Additional staffing will be required to deal with a range of new requirements as set out below, while supporting the delivery of existing Government commitments and policies:

- The Convention on Biological Diversity commitments for 2030
- EU Biodiversity Strategy for 2030 including restoration commitments that arise from existing environmental legislation as well as from the proposed Nature Restoration Regulation and the National Restoration Plan
- Conservation objectives and necessary conservation measures for Natura 2000 sites, including compliance with EU Court of Justice rulings on designation and management of SACs under the Habitats Directive.
- Oversight and delivery of the National Biodiversity Action Plan
- The implementation of the recommendations of the Citizens Assembly on Biodiversity Loss.
- Ensuring that Offshore Renewable Energy plans are compatible with legal obligations on biodiversity

Given the urgency to restore nature globally the United Nations has declared this as the UN decade on ecosystem restoration 2021-2030<sup>4</sup>.

In Europe nature is in serious decline, with more than 80% of habitats in poor condition<sup>5</sup>. The European Commission's proposal for a Nature Restoration Law is the first continent-wide, comprehensive law of its kind. It is a key element of the EU Biodiversity Strategy, which calls for binding targets to restore degraded ecosystems.

The proposal aims to restore ecosystems, habitats and species across the EU's land and sea areas in order to

Enable the long-term and sustained recovery of biodiverse and resilient nature

- Contribute to achieving the EU's climate mitigation and climate adaptation objectives
- Meet international commitments

<sup>4</sup> <https://wedocs.unep.org/bitstream/handle/20.500.11822/30919/UNDecade.pdf>

<sup>5</sup> [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_20\\_1920](https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1920)

The proposed regulation foresees that EU countries submit National Restoration Plans to the Commission within two years of the Regulation coming into force, showing how they will deliver on the targets. It also foresees monitoring and reporting on their progress.

NPWS will have a leading role in delivering any ambitious restoration plan for nature. Drawing up a national plan within two years and putting the necessary infrastructure in place to allow for implementation, monitoring and measurement will require significant financial and human resources in the period to 2030 and beyond.

The requirements above will drive a significant increase in workload for the NPWS and, while difficult at this point to determine the exact staffing needs, the Expert Group recommends providing for an annual increase of approximately 5% in staff numbers throughout this period from the recommended 2026 position of 737. This would bring headcount to c. 895 by the end of 2030 and 1,036 by 2033.



## 4. Conclusion and Recommendations

As set out in section 3 the Expert Group makes 3 main recommendations in relation to NPWS staffing, as follows:

1. Current staffing levels to be increased by 40% to 737 by end of 2026.
2. In the subsequent 4 years, to 2030, staffing be increased by a further 158 people bringing the total to 895 people by the end of this period.
3. In the following 3 years, to 2033, a further 141 people will need to be taken on, bringing total headcount by 2033 to 1,036.

While it was not within the remit of the Group to allocate the additional resources across the various Directorates in place within the NPWS, it was able to assess some of core capabilities that need to be strengthened. Based on this assessment it is recommended that a large proportion of the additional resources be allocated to the following areas:

- **Strengthen NPWS capacity for scientific knowledge, evidence and data management.**

Compliance with national, EU and international biodiversity commitments needs to be underpinned by up to date, reliable and accessible scientific knowledge (see **Appendix 4** for the wide range of EU commitments that require scientific monitoring and reporting).

Example: In 2022 NatureScot launched its Science & Evidence leadership programme, supported by 1 FTE programme manager, overseen by a programme board chaired by the Chief Scientist. The aims of the programme are to increase the impact and influence of NatureScot's science and evidence and reinforce NatureScot's role as trusted adviser to Government and other parties. It will cover the natural, social and physical science spheres. There are 3 workstreams: Science Leadership co-ordination & development; External Influencing and advocacy; and overseeing a programme of Science Skills Development.

- **Increase capacity to ensure effective management of Natura 2000 sites and other protected areas.**

Evidence:

On 29 June 2023 in the Measures Case, the EU Court of Justice concluded that Ireland failed to designate and establish the necessary conservation measures for Special Areas of Conservation under the Habitats Directive based on clearly defined conservation objectives. It is imperative that NPWS is adequately resourced to ensure compliance with ongoing commitments under the Nature Directives as regards the making, review updating and delivery of Site Specific Conservation Objectives and Site Conservation Measures.

The cost of any fines that may arise from a failure to comply with EU court rulings will far outweigh the cost of recruiting additional people to ensure that NPWS, as the leading competent authority, allows Ireland meet its obligations in a timely manner to avoid penalties.

Example: **Protected Nature Sites** - NatureScot deals with 5,590 features across 1,888 sites, covering a total of 14,576km<sup>2</sup> (1,457,654 (ha)). The total area with a protected status in Scotland is 18.2% of total land (compared to 17.8% for the NPWS). This covers National Nature Reserves, Special Areas of Conservation (SACs), Special Protected Areas (SPAs) Ramsar (wetland site) and Sites of Special Scientific Interest (SSSIs).

NatureScot has 2 FTE working on Natura core policy work. In addition to the 2 FTE policy roles, there are 36 FTE working on protected site related work, which includes casework and improving site condition. In addition, there are 8 FTE working on Site Condition Monitoring.

- **Strengthen the ability to manage, promote and ensure the sustainable use of Ireland's National Parks.**

Evidence: At present, Scotland's two National Parks cover 7.2% of its land area. The Cairngorm National Park Authority (CNPA) covers 4,528 km<sup>2</sup>, and has 82.8 FTE across the organisation (as at Feb. 2023), excluding 13 FTE seasonal & trainee. This resource covers Nature & Climate (27.1 FTE) (includes peatland team), Planning & Place (22.9 FTE) (includes rural development and access), Communications & EO (7.6 FTE) and Corporate Services (25.2) FTE.

The Loch Lomond & Trossachs National Park (LLTNPA) covers 1,865 km<sup>2</sup>, and has 144.59 FTE (as at Feb 2023). This will increase over summer months due to seasonal posts. This resource covers Engagement & Innovation (10.57 FTE), Place (includes development planning) (27.83 FTE), Environment & Visitor Services (45.78 FTE), Executive (14.81 FTE) & Corporate Services (45.6 FTE) functions.

- **Develop the capacity to put in place and deliver a major restoration programme for nature for the period up to 2030.**

Evidence: The most recent 'State of Nature' assessment for Ireland in 2019 shows that many species and habitat types protected under EU legislation are in an unfavourable status in Ireland and in some cases continuing to decline. This is particularly the case for protected habitats with nearly half of them in bad status and showing ongoing declines. There is also limited evidence of improvements, indicating that the overall objectives of the Nature Directives are not yet being achieved by Ireland.<sup>6</sup> This scientific evidence underpins the need for a major restoration programme. This will not only deliver major biodiversity benefits but also make an important contribution to Ireland's climate mitigation and adaptation targets.

It is clear to the Group that the NPWS is well behind the comparative organisations in terms of its restoration programme.

Example: Restoring nature is one of the key aims of the current NatureScot Corporate Plan ([A nature-rich future for all](#)). The priorities are to co-lead the production of the new Scottish Biodiversity Strategy and Delivery Plan; scaling up Peatland restoration; delivering the Nature Restoration Fund (see below) and developing tools to demonstrate how agriculture can be transformed to deliver nature and climate outcomes.

Example: **Peatland ACTION** is a national programme to restore peatlands across Scotland. In February 2020, the Scottish Government announced a substantial, multi-annual investment. Projected funding for peatland restoration is £250m over a 10-year period (target to have 250,000ha restored by 2030). NatureScot has a Peatland team, consisting of 34 FTE currently.

Example: **Nature Restoration Fund (NRF)**. This is a £65m, multi-year, competitive fund which was launched in July 2021. It specifically encourages applicants with projects that restore wildlife and habitats on land and sea, and address the twin crises of biodiversity loss and climate change. In the latest (Feb 2023) Transforming Nature round of the NRF over thirty projects will share £7.6 million. NatureScot manages this fund on behalf of Scottish Government.

---

<sup>6</sup> [https://www.npws.ie/sites/default/files/publications/pdf/NPWS\\_2019\\_Vol1\\_Summary\\_Article17.pdf](https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf)

- **Strengthen the administrative functions of the NPWS to secure and manage the necessary public and private funding for investments in nature.**

It was noted that there are opportunities to raise finance that are being exploited by other countries but not yet fully availed of by the NPWS and for which the organisation will need to significantly improve its capacity to draw down and manage the necessary funds. The Irish government has published a Prioritised Action Framework (PAF) for Natura 2000 in Ireland pursuant to Article 8 of the Habitats Directive. This PAF is designed to provide information about the priority Natura 2000- related financing needs, with a view to their incorporation into the relevant EU funding instruments under the 2021-2027 Multi Annual Financial Framework (MFF).

Evidence: **Environmental Green Finance** is a growing area of work for NatureScot which has three main priorities: making use of private finance to deliver objectives; supporting the emergence of investment in relevant projects; and, helping develop the market infrastructure in data, metrics, codes, credits. NatureScot currently has 5 FTE staff supporting this work (including 1 FTE on marine related elements).

Example: **Facility for Investment Ready Nature in Scotland (FIRNS)** NatureScot, working with the Scottish Government, in partnership with the National Lottery Heritage Fund, have launched a new, £1.8m programme of support to help scale up private investment in Scotland's natural capital.

Example: **Scottish Marine Environmental Enhancement Fund (SMEEF)** SMEEF is an innovative green finance vehicle that facilitates investment in marine and coastal restoration in Scotland.

Example: **Private Finance Investment Pilot** - NatureScot has joined with a UK private bank, Hampden & Co, Lombard Odier Investment Managers and global impact firm Palladium, with the potential to invest up to £2billion, primarily in native woodland creation.

Evidence: **External Funding** - NatureScot has substantially increased its capacity to deliver funding programmes. These include Peatland ACTION; significant external funding programmes such as the ERDF Natural & Cultural Heritage Fund (NCHF) and Green Infrastructure Strategic Intervention (GISI) Fund (concluding in 2024).

In terms of resources, NatureScot's core External Funding team is 14 FTE strong. NPWS does not have an equivalent team.

Natural England has improvements in natural capital as one of its key action areas in its 5-year plan to 2025 and this will be a priority for resource allocation over that period.

- **Strengthen NPWS capacity for communication and stakeholder engagement on biodiversity and nature conservation.**

Evidence: In each of the four organisations reviewed (Denmark, Finland, Sweden and England) as part of the Stout & Ó Cinnéide report and in Parks Canada engagement with the public, including to promote outdoor recreation in nature and encourage other forms of sustainable use of protected areas, is a specific aspect of those organisation's remits, as is working with land-owners and other organisations on sustainable habitat management including through nature-based solutions and/or natural capital approaches.

Example: NatureScot has 22 FTE within its Communications team, supporting communication, stakeholder engagement and campaigns. NatureScot has a small media team who share responsibility for covering social media with one person dedicated to cover all key channels each day. Other staff will contribute to postings, so the actual resources will be much greater. To support engagement with the public NatureScot utilises various social media platforms. NatureScot has built up a large following on Twitter, Facebook and Instagram, and also makes use of YouTube, LinkedIn and a blog space on Wordpress. Typical activity across platforms: Twitter – 170 times per month; Facebook – 2 to 4 postings each day; Instagram – one posting each day. NatureScot is also currently testing Snapchat and TikTok to see if this can add value for digital campaigns.

- **Build NPWS capability to promote and ensure compliance with National/EU/international biodiversity legal commitments (see *Appendix 4*).**

Evidence: Failure to meet these requirements comes with a significant cost. As set out above, the failure by Ireland to meet EU legal environmental requirements in just one case has resulted in fines totalling €17 million. There are further ongoing infringement proceedings against Ireland relevant to responsibilities of the NPWS which could result in additional penalties being imposed. The judgement of the EU Court of Justice of 29 June 2023 in relation to designation and management of Special Areas of Conservation under the Habitats Directive will need to be fully complied with in a timely manner. A recent European Commission study examining the management of Special Protection Areas under the Birds Directive across ten member states<sup>7</sup> reveals that Ireland currently has poor implementation of key protected area requirements compared with other countries.

---

<sup>7</sup> <https://op.europa.eu/en/publication-detail/-/publication/b81bea2f-8fd0-11ed-b508-01aa75ed71a1/language-en/format-PDF/source-281549266>

- **Strengthen NPWS capacity to fully avail of and optimise use of relevant emerging technologies.**

Evidence: The Group saw evidence of paper based systems being used in parts of the NPWS. As a comparator NatureScot has established an innovative technology programme, initially investing 1 FTE as the programme lead. This role has been responsible for identifying funding opportunities to support innovation, and connecting topic leads across NatureScot. Through this work NatureScot has tackled a number of challenges, including through the CivTech annual challenge programme ([CivTech website](#)). NatureScot has also established a strategic partnership with CivTech. NatureScot and CivTech are working on Innovate for Nature, built around Scotland's Environment Strategy.

**Licencing.** NatureScot is continuing in-house software development of a new on-line licencing system to help make efficiency savings and improve service delivery. During 2020/21 (pre on-line) the average turnaround was 9.4 days for one licencing system. A random check of those processed since the new on-line licence element was introduced reveals that this has reduced to an average turnaround of 2.1 days.

- **Invest further in Learning & Development with the aim of becoming an Employer of Choice in the nature sector.**

Given current and growing demands on NPWS, consideration should be given to how best to enhance the organisational approach to talent management and supporting learning and development at all levels. This, combined with strategic workforce planning, would allow NPWS ensure it has the skills and capacity needed to deliver its work going forward. The review of talent management should align with Civil Service Renewal 2030 Strategy which sets out an ambition for an innovative and agile Civil Service that empowers people to work creatively and collaboratively to deliver excellent policy and services to Government and the people.

Example: **Investment in Learning and Development** in NatureScot is in the range of €168-225k per annum, approximately 0.5% of paybill costs. Talent management and learning and development is delivered through a range of interventions in NatureScot, underpinned by a Learning Framework.

Example: **Nature-based jobs & Skills** – NatureScot has led work to identify the nature-based jobs and skills that will be required in the future Scottish workforce. The aim is to ensure that there is capacity to deliver the nature-based solutions to support net zero ambitions. A NatureScot initial assessment of nature-based jobs and skills found that jobs in the nature-based sector make a significant contribution to the Scottish economy, amounting to 195,000 jobs or 7.5% of Scotland's workforce in 2019. Nature-based jobs grew at more than five times the rate of all jobs in Scotland in the period 2015-19 and accounted for one third of all job growth in those years.

# Appendices

## 1. Terms of reference

### International Expert Comparator Group on NPWS Staffing

(the group was initially referred to as a benchmarking group but it was felt that this title did not properly reflect the work being undertaken)

#### Purpose of Group

The purpose of the group is to give effect to Recommendation 6 of the Kearney Report.

#### Recommendations of Group

The group will make evidence-based recommendations, on an international, best-practice basis, as to the overall human resourcing requirement of the National Parks and Wildlife Service.

The recommendations should set out the long-term staffing requirement for the organisation over the coming five to ten years, drawing on international expertise in and comparators from organisations with similar remit to the NPWS. It should also set out the associated financial resourcing requirement and address the timing of up-scaling, given capacity levels and evolving needs.

#### Scope

The focus of the group will be to ensure that NPWS can deliver on its core functions and services to the public into the future, taking account, insofar as possible, of likely increasing international and national obligations in the coming five to ten years.

The group will not revisit or re-open matters dealt with via the *Review, Reflect, Renew* process, or coming within the parameters of the Government Decision of 3 May 2022, including the Strategic Action Plan approved by Government on that date.

#### Methodology

The group will make its recommendations to the NPWS Management Board within twelve weeks of its first meeting, or as soon as possible thereafter.

The group will meet as often as needed. Meetings may be virtual or in-person, as determined by the Chair. The group may undertake familiarisation visits at the discretion of the Chair and agreed as essential to the work of the group.

Only the final agreed report of the group shall be deemed a substantive record for the purposes of publication, FOI legislation and so forth.

As the deliberations of the group relate to the HR sphere in the main, those deliberations shall be deemed confidential for the purposes of GDPR and, for the avoidance of doubt, this shall extend to all data, notes and contributory evidence amassed.

The group will make evidence-based, best-practice recommendations, drawing on the experience of organisations internationally that successfully carry out similar functions to NPWS, including those that operate within a comparable statutory and public accountability framework.

The group will engage with the NPWS Management Board throughout the process.

The group may also engage with NPWS staff, as necessary, to carry out its functions, such engagement to be as determined by the group via the Chair and agreed with the NPWS Management Board.

The group may engage with other organisations, nationally and internationally.

Engagement of the group with the general public, members of the media, the stakeholder community, or within the political sphere will be via the Chair, and with the prior agreement of the NPWS Management Board.

The group shall engage too with the Corporate Division of the Department of Housing, Local Government and Heritage.

## **Timeline**

The group will report on its findings to the NPWS Management Board within twelve weeks of its first meeting, or as soon as possible thereafter.

## **Background**

The Programme for Government 2020 sets out a commitment to, “review the remit, status and funding of the National Parks and Wildlife Service (NPWS), to ensure that it is playing an effective role in delivering its overall mandate and enforcement role in the protection of wildlife”. The [independent, multi-phase review](#)<sup>87</sup> was completed in February 2022 and culminated in fifteen key recommendations to renew the NPWS and make it a more resilient, more effective organisation, fit to meet the challenges of the twenty first century.

Principal Recommendation No. 6 of the Review recommends ‘to set up an expert group, drawing on international expertise in organisations with a similar remit to the NPWS, to establish the human resourcing requirement of the NPWS on an international, best practice

---

<sup>8</sup> <https://www.gov.ie/en/publication/fbb81-national-parks-and-wildlife-service-strategic-action-plan-and-review/>



*basis*'. This document outlines the terms of reference for the benchmarking exercise to be carried out by this expert group.

The National Parks and Wildlife Service (NPWS) while a relatively small Executive Agency, has an extraordinarily complex range of responsibilities:

- significant policy advisory and policy-making functions in relation to Nature and Biodiversity;
- a wide range of operational responsibilities including the management of six National Parks, 74 Nature Reserves, and a variety of other State lands
- accessible to the public;
- managing a range of EU programmes, alongside thousands of conservation measures across our designated areas and National Parks; it partners
- across a range of other conservation interventions;
- a broad scientific remit being the principal coordinator of the National Biodiversity Action Plans, the monitoring of designated sites, while
- undertaking significant scientific research;
- Being a statutory consultee in relation to planning matters, including county and regional development plans;
- regulatory and licencing functions;
- administering grant schemes to support farm-plans, conservation measures, actions for biodiversity, as well as invasive species control measures;
- investigation and prosecution of wildlife crime.

The Agency is geographically and operationally diverse, and given the breadth of its functions, draws on a wide range of specialised and professional competencies, alongside expert managerial and policy-making skills.

NPWS October 2022

## APPENDIX 2

### NPWS

Implementation of national and international law and international conventions on biodiversity. Management of state-owned protected areas.

#### DIRECTORATE

#### Scientific Advice and Research

#### RESPONSIBILITIES

Provision of scientific advice and evidence; centralised function for applied research and analysis.

#### Nature Conservation

Conservation measures and incentives at Natura sites, peatlands conservation and restoration, EU measures, implementation of Reform programme.

#### National Parks and Nature Reserves

Operational management, including delivery of conservation work within these areas, Visitors, Facilities and Site Management, strategy development for National Parks and Nature Reserves.

#### Legislation and Licensing

Ecological assessments, Licencing (wildlife) Legislation including Wildlife Acts, co-ordination of judicial review cases.

#### Wildlife Enforcement and Nature Protection

Wildlife Crime, safeguarding and protection of designated habitats and species.

#### Engagement and Corporate (incl. digital innovation)

Stakeholder engagement, Communications, HR, Legal advice and Corporate.

### NatureScot

Provide scientific advice and evidence, including commissioning of applied conservation research to Scottish government to inform policies. Co-lead, with Scottish Government, delivery of Scottish Biodiversity Strategy.

Conservation measures on protected nature sites via Agri-Env schemes & Management Agreements, Peatland Restoration, management of marine environment including MPAs, enabling investment in Green Finance.

Operational Management of National Nature Reserves (NNRs), covers site and visitor management, deer management (where applicable), and other activities to maintain 'favourable condition' status.

Licencing applications.

Development casework, site condition monitoring, wildlife crime, protection of designated habitats and species.

Stakeholder and public engagement, media relations, utilisation of digital innovation, management of grant funding to externals. All corporate functions: HR, Finance, Audit, Property, IT and Information/Records Management.

**Note:** NatureScot does not employ Rangers and not all NNRs in Scotland are owned/managed by NatureScot.

**Note:** Scotland's 2 National Parks are managed by separate organisations, not NatureScot.

## NPWS

Implementation of national and international law and international conventions on biodiversity. Management of state-owned protected areas.

### DIRECTORATE

### RESPONSIBILITIES

#### Scientific Advice and Research

Provision of scientific advice and evidence; centralised function for applied research and analysis.

#### Nature Conservation

Conservation measures and incentives at Natura sites, peatlands conservation and restoration, EU measures, implementation of Reform programme.

#### National Parks and Nature Reserves

Operational management, including delivery of conservation work within these areas, Visitors, Facilities and Site Management, strategy development for National Parks and Nature Reserves.

#### Legislation and Licensing

Ecological assessments, Licencing (wildlife) Legislation including Wildlife Acts, co-ordination of judicial review cases.

#### Wildlife Enforcement and Nature Protection

Wildlife Crime, safeguarding and protection of designated habitats and species.

#### Engagement and Corporate (incl. digital innovation)

Stakeholder engagement, Communications, HR, Legal advice and Corporate.

## Parks Canada

Manages national historic sites, national parks and national marine conservation areas. Steward of these heritage places, protecting and sharing them for the benefit of all Canadians.

Research to support management of invasive species, hyper-abundant species, species at risk and critical habitats.

Maintenance and restoration of ecological integrity. Active and adaptive management measures. Monitoring programs. Environmental assessment.

Establishment and management of national parks, national urban parks and national marine conservation areas.

Business licence and lease programs. Legislative and regulatory proposals.

National law enforcement program with dedicated trained and professional law enforcement officers. Public outreach education and engagement programs in place to achieve greater compliance.

Public outreach and engagement, marketing and promotions. Local/national strategic partnering. Quality Visitor Experience program. Social science research, media relations, special events, social media, new media, digital content strategy, corporate and public communications.

## NPWS

Implementation of national and international law and international conventions on biodiversity. Management of state-owned protected areas.

### DIRECTORATE

### RESPONSIBILITIES

#### Scientific Advice and Research

Provision of scientific advice and evidence; centralised function for applied research and analysis.

#### Nature Conservation

Conservation measures and incentives at Natura sites, peatlands conservation and restoration, EU measures, implementation of Reform programme.

#### National Parks and Nature Reserves

Operational management, including delivery of conservation work within these areas, Visitors, Facilities and Site Management, strategy development for National Parks and Nature Reserves.

#### Legislation and Licensing

Ecological assessments, Licencing (wildlife) Legislation including Wildlife Acts, co-ordination of judicial review cases.

#### Wildlife Enforcement and Nature Protection

Wildlife Crime, safeguarding and protection of designated habitats and species.

#### Engagement and Corporate (incl. digital innovation)

Stakeholder engagement, Communications, HR, Legal advice and Corporate.

## DANISH NATURE AGENCY

Implementation of national on biodiversity. Management of state-owned protected areas, research, public engagement and education. Natura 2000 sites (3,100 km<sup>2</sup>) are managed by the Danish EPA. (Note: Commercial income accounts for more than 50% of funding). Danish coastal authority - conservation measures in national marine and coastal territory.

Management of state owned nature conservation designations - national parks, foreshore and forestry biodiversity management, monitoring, research and education.

Policies, guidelines, goals and direction for the organisation. Finance, payroll, IT, communications, facilities management.

## NPWS

Implementation of national and international law and international conventions on biodiversity. Management of state-owned protected areas.

### DIRECTORATE

### RESPONSIBILITIES

#### Scientific Advice and Research

Provision of scientific advice and evidence; centralised function for applied research and analysis.

#### Nature Conservation

Conservation measures and incentives at Natura sites, peatlands conservation and restoration, EU measures, implementation of Reform programme.

#### National Parks and Nature Reserves

Operational management, including delivery of conservation work within these areas, Visitors, Facilities and Site Management, strategy development for National Parks and Nature Reserves.

#### Legislation and Licensing

Ecological assessments, Licencing (wildlife) Legislation including Wildlife Acts, co-ordination of judicial review cases.

#### Wildlife Enforcement and Nature Protection

Wildlife Crime, safeguarding and protection of designated habitats and species.

#### Engagement and Corporate (incl. digital innovation)

Stakeholder engagement, Communications, HR, Legal advice and Corporate.

## MHNPF (Finland)

Implementation of national law on biodiversity, development of biodiversity policy. Management of state-owned protected areas and state-owned commercial forestry. Management of state-owned hunting and fishing grounds, research, public engagement and education.

National Parks Finland - manages nature reserves and holds responsibility for biodiversity conservation and implementation of international agreements.

Maintenance of snowmobile routes.

Wildlife Service Finland - manages state owned hunting and fishing grounds and responsible for related access and permitting. Maintenance and restoration of valuable habitats.

IT, communications, finance, leadership and management, digitalisation.

## NPWS

Implementation of national and international law and international conventions on biodiversity. Management of state-owned protected areas.

### DIRECTORATE

### RESPONSIBILITIES

#### Scientific Advice and Research

Provision of scientific advice and evidence; centralised function for applied research and analysis.

#### Nature Conservation

Conservation measures and incentives at Natura sites, peatlands conservation and restoration, EU measures, implementation of Reform programme.

#### National Parks and Nature Reserves

Operational management, including delivery of conservation work within these areas, Visitors, Facilities and Site Management, strategy development for National Parks and Nature Reserves.

#### Legislation and Licensing

Ecological assessments, Licencing (wildlife) Legislation including Wildlife Acts, co-ordination of judicial review cases.

#### Wildlife Enforcement and Nature Protection

Wildlife Crime, safeguarding and protection of designated habitats and species.

#### Engagement and Corporate (incl. digital innovation)

Stakeholder engagement, Communications, HR, Legal advice and Corporate.

## NATURAL ENGLAND

Implementation of national law on biodiversity. Management of state-owned protected areas. Research, public engagement and education.

Promote nature conservation and protect biodiversity.

Conserve and enhance the landscape. Secure the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment. Promote access to the countryside and open spaces and encourage open-air recreation.

Legal and governance.

Wildlife crime.

Planning and performance.

## NPWS

Implementation of national and international law and international conventions on biodiversity. Management of state-owned protected areas.

### DIRECTORATE

### RESPONSIBILITIES

#### Scientific Advice and Research

Provision of scientific advice and evidence; centralised function for applied research and analysis.

#### Nature Conservation

Conservation measures and incentives at Natura sites, peatlands conservation and restoration, EU measures, implementation of Reform programme.

#### National Parks and Nature Reserves

Operational management, including delivery of conservation work within these areas, Visitors, Facilities and Site Management, strategy development for National Parks and Nature Reserves.

#### Legislation and Licensing

Ecological assessments, Licencing (wildlife) Legislation including Wildlife Acts, co-ordination of judicial review cases.

#### Wildlife Enforcement and Nature Protection

Wildlife Crime, safeguarding and protection of designated habitats and species.

#### Engagement and Corporate (incl. digital innovation)

Stakeholder engagement, Communications, HR, Legal advice and Corporate.

## SWEDISH ENVIRONMENTAL PROTECTION AGENCY

Implementation of national law on biodiversity, development of biodiversity policy. Management of state-owned protected areas and state-owned commercial forestry. Management of state-owned hunting and fishing grounds, research, public engagement and education.

Responsible for nature conservation in Sweden and the owner of national parks. Also provides financial support to nature reserves and other sites with various forms of landscape protection.

Four Departments; Climate Action, Sustainable Society, Natural Environment and Sustainable Development.

Administration, digitalisation, communications, management.

## APPENDIX 3

### Benchmarking Statistics

Information from Stout & Ó Cinnéide Report, NatureScot and Parks Canada

#### STATISTICS

	NOTES	No. of employees	National Area (km <sup>2</sup> )	State Protected Area (km <sup>2</sup> )	Annual Budget 2020/2021 (€'mm)	Budget per km National Area €'000	Budget per km Protected Area €'000	No. employees per 1,000km Protected Area	Total Average
NatureScot (FTEs)	1	654	77,910	14,576	55	0.70	3.74	44.87	
Parks Canada (FTEs)	2	5,383	9,985,000 – Total size of Canada	460,000 –	775	0.08	1.68	12.10	
Danish Nature Agency		670	42,933	2,000	102.20	2.38	42.58	279.17	
Natural England	3	1991	132,942	36,815	148.94	1.12	4.05	54.08	
MHNPF (Finland)	4	434	338,440	60,919	68.00	0.20	1.12	7.12	
Swedish EPA	5	670	450,295	67,544	559.93	1.24	8.29	9.92	
Average						0.95	10.24	58.38	
NPWS (FTEs)		354	70,273	12,522	27.84 (pg79)	1.07	5.99	42.09	
<b>NPWS vs Average</b>						<b>11%</b>	<b>-71%</b>	<b>-39%</b>	<b>-33%</b>



**NOTES:**

The information for the Danish Nature Agency, Natural England, MHNPF (Finland) and the Swedish EPA is that provided to Stout & Ó Cinnéide for the purposes of their 2021 report.

1. The NatureScot budget for 20/21 of £49.121m is converted to Euro at historical exchange rate (for 20/21) of 1.11  
Note: In-year adjustments for ring-fenced funds increased this figure by £2.631m (€2.920m) plus £1m capital (€1.110m).
2. The Parks Canada budget for 20/21 of Can \$1,105.6 mm is converted to Euro at current exchange rate of 0.7.
3. The Natural England employee number provided of 2,247 includes 512 part time employees. It is assumed that these people work for 50% of a full week so are equivalent to 256 full time equivalents.  
The total Natural England full time equivalent employee number is 1,991 (2247 - 512 + 256).
4. Stout & Ó Cinnéide note that the MHNPF budget is approximately 50% of the total national expenditure on the environment.
5. The Swedish EPA employee number provided of 719 includes 97 part time employees. It is assumed that these people work for 50% of a full week so are equivalent to 48 full time equivalents.  
The total Natural England full time equivalent employee number is 670 (719 - 97 + 4

## APPENDIX 4

### Global and EU biodiversity commitments for 2030 that Ireland has signed up to and for which NPWS has a leading responsibility in delivering

The **Convention on Biological Diversity (CBD)** is the overarching global framework for international action in relation to the conservation and sustainable use of biodiversity. Ireland is a contracting party (since 1996) as is the European Union (since 1994). The 15<sup>th</sup> Conference of the Parties (COP15) of the CBD, which took place between 7-19 December 2022 in Montreal, has adopted '**the Kunming-Montreal Global Biodiversity Framework**<sup>9</sup>', a highly ambitious landmark agreement to guide action by contracting parties, including Ireland, to halt and reverse the decline of nature and restore ecosystems by 2030.

Ireland has also signed up to other international biodiversity Conventions for which the NPWS is the lead authority. These include the **Ramsar Convention** for the conservation and wise use of wetlands; the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); the Convention on Migratory Species (**Bonn Convention**) and its Agreements - Agreement on the Conservation of African-Eurasian Migratory Waterbirds (**AEWA**), Agreement on the Conservation of Small Cetaceans of the Baltic, North East Atlantic, Irish and North Seas (**ASCOBANS**), Agreement on the Conservation of Populations of European Bats (**EUROBATS**) and the Convention on the Conservation of European Wildlife and Natural Habitats (**Bern Convention**).

The **EU Biodiversity Strategy for 2030**, together with its associated action plan, which was adopted by the European Commission in May 2020<sup>10</sup>, sets out a comprehensive, ambitious, long-term plan for protecting nature and reversing the degradation of ecosystems in the EU. The Strategy, which forms an integrated part of a broader action agenda under the European Green Deal, sets out over one hundred concrete actions under four areas of action, to tackle the loss of biodiversity. These are protecting nature, restoring nature, enabling transformative change and EU action for an ambitious global agenda.

---

<sup>9</sup> <https://www.cbd.int/article/cop15-final-text-kunming-montreal-gbf-221222>

<sup>10</sup> European Commission, 'EU Biodiversity Strategy for 2030 - Bringing nature back into our lives' COM/2020/380 final [https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030\\_en](https://environment.ec.europa.eu/strategy/biodiversity-strategy-2030_en)

The National Parks and Wildlife Service (NPWS) is the lead authority in Ireland to ensure effective delivery of many of the global and EU biodiversity commitments and to ensure overall co-ordination of implementation of the commitments. Key biodiversity targets under both the global and EU commitments relate to protected areas<sup>11</sup>, restoration of ecosystems, reducing the risk of species extinctions, ensuring sustainable use of biodiversity, addressing invasive species, ensuring that the best available data, information and knowledge, are accessible to decision makers, practitioners and the public and strengthening communication, awareness-raising and education in relation to biodiversity.

The 2030 biodiversity commitments include EU legal obligations set out under the Birds and Habitats Directives (including in relation to areas protected in the Natura 2000 network) as well as the Invasive Species and CITES Regulations, for all of which the NPWS is the leading implementation responsible body in Ireland. NPWS has also lead responsibility for the EU Zoos Directive. Adoption of the proposed EU Nature Restoration Regulation would also largely fall under the responsibility of NPWS.

The above legal and policy commitments require NPWS to have the capabilities and capacities for:

#### **Scientific Advice, Research and Data Management including in relation to**

- Monitoring and reporting to meet periodic 6-year 'State of Nature' assessments pursuant to Article 17 of the Habitats Directive and Article 12 of the Birds Directive
- Scientific surveys and assessments for selection of Natura 2000 sites and other protected areas in both terrestrial and marine environments
- Undertaking the necessary research to define the ecological requirements of species and habitat types protected under the Habitats and Birds Directives and national protected areas as well as for strictly protected species and for identification of the necessary management/restoration that needs to be put in place
- Setting clearly defined conservation objectives for Natura 2000 sites and other protected areas
- Preparing scientific advice for consultation with landowners and other key stakeholders that may be affected by protected area designation
- Periodic assessment of management effectiveness of Natura 2000 and other protected areas
- Data management and publishing of results of research and surveys

---

<sup>11</sup> Both the global and EU targets require 30% of both land and the marine to be designated and under effective management by 2030

## Effective conservation of protected species, habitats and sites through

- Establishment and operating a comprehensive system for the management of Natura 2000 sites<sup>12</sup> & other protected areas<sup>13</sup>, including management plans to support delivery of necessary conservation measures for sites and necessary engagement of stakeholders, including for the marine environment.
- Operating the raised bog SAC compensation scheme and delivery of site restoration programme for both raised bog and blanket bog SACs as well as wider peatland restoration programmes in partnership with other bodies such as Bord na Móna
- Liaising with other government departments and influencing the design and delivery of agri-environment programmes/schemes under Ireland's CAP Strategic Plan, particularly in relation to promoting result-based payment schemes and follow up to relevant LIFE projects
- Development of programmes of action at a sufficient scale for the recovery of species and habitat types in unfavourable conservation status that are protected under the Nature Directives
- Subject to adoption of EU nature restoration regulation development of national restoration plan and ensuring delivery of restoration of different ecosystems at a sufficient scale
- Development and implementation of EU LIFE projects
- Development and implementation of cross-border North-South biodiversity conservation projects (previously supported under INTERREG)
- Putting in place the necessary measures to tackle listed species under the EU Invasive Species Regulation<sup>14</sup>
- Related to the above, promoting compliance with EU nature requirements within and outside Natura 2000 and helping to prevent infringements (aspects of compliance assurance)

---

• <sup>12</sup>A judgement of the EU Court of Justice (in case 2015/2006), which was given on 29 June 2023, has major implications for this area of work

• <sup>13</sup>As all Ireland's national parks and most nature reserves are protected under Natura 2000 the site management and restoration requirements under EU nature legislation also applies to them

• <sup>14</sup>Regulation on the prevention and management of the introduction and spread of invasive alien species [1143/2014] - 12 species of Union concern are established in Ireland and a further 13 species have been recorded in recent years but are not known to be established <https://invasives.ie/about/ias-union-concern/>

## Ensuring effective operation of wildlife Legislation and Licensing through

- Ensuring input into strategic decision-making by government Departments and (e.g. Department of Agriculture Food and the Marine) other competent authorities that have implications for nature conservation, e.g. by helping to scope and inform strategic environmental impact assessments (SEAs) and Natura 2000 appropriate assessments (AAs) on plans and programmes to enable an overall coherence of approach across government.
- Dealing with appropriate assessments for plans and projects that are likely to affect Natura 2000 sites (Article 6.3/6.4 of Habitats Directive <sup>15</sup>), including statutory consultation on development proposals <sup>16</sup>
- Licencing and regulation of activities relating to wildlife (in a timely manner), including hunting, possession, import and export, capture for scientific purposes and disturbance of certain species (as governed by Habitats or Birds Directives, CITES) <sup>17</sup>
- 
- Operating and reporting on application of species derogation schemes under Birds and Habitats Directives <sup>18</sup>
- Licencing and inspection under EU Zoos Directive
- Securing legal advice in relation to judicial reviews, national legal challenges and EU infringements case work

## Ensuring Wildlife Enforcement and Nature Protection through

- Developing a policy on compliance assurance activities (prevention, detection and enforcement) to ensure compliance with and address breaches of prohibitions and rules arising under EU nature legislation (Nature Directives, CITES, Timber Regulation etc.)
- For compliance assurance purposes, providing information and guidance, operational support, intelligence, training, records and a national database, reviews of evidence, public Relations and awareness and liaison with prosecution authorities (if outside NPWS)

---

<sup>15</sup> The European Commission has recently updated its guidance on management of Natura 2000 including in relation to appropriate assessments [https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/EN\\_art\\_6\\_guide\\_jun\\_2019.pdf](https://ec.europa.eu/environment/nature/natura2000/management/docs/art6/EN_art_6_guide_jun_2019.pdf), that includes examples of good practices across the Member States [https://ec.europa.eu/environment/nature/natura2000/management/pdf/annexes\\_2021-10/EN%20annex.pdf](https://ec.europa.eu/environment/nature/natura2000/management/pdf/annexes_2021-10/EN%20annex.pdf)

<sup>16</sup> This will be particularly challenging for dealing with proposed developments in the marine environment. Stout and Ó Cinnéide have noted that 'NPWS is already heavily under resourced in the marine area. Given the large number of offshore wind energy projects in the near term, and projected growth of the industry in the coming decades, significant additional resources will be required'. (see page 52)

<sup>17</sup> A full listing of the types of licences, showing the breadth of licenses issued by NPWS in 2020, is given in Appendix 8 of Stout and Ó Cinnéide

<sup>18</sup> The European Commission has asked Ireland to improve the overall derogation system which has lacked the necessary quality and quantity of information to enable a determination if the use of derogations is consistent with the legal requirements of the Directives

- Ensuring effective enforcement action in respect of illegal activities (e.g. illegal peat extraction)
- Creating and maintaining an effective network to co-operate and co-ordinate with other authorities with relevant wildlife enforcement functions (e.g. EPA, which has responsibility for environmental liability, which includes biodiversity damage)
- Implementing the updated 2022 EU Wildlife Crime Action Plan <sup>19</sup>.

### **Strengthening stakeholder engagement and communication**

- Consultation with landowners and other key stakeholders that may be affected by Natura 2000 and other protected area designations
- Promoting awareness of the value and benefits of EU related biodiversity commitments and action through education, outreach to schools and engaging with stakeholders (e.g. the importance and value of Natura 2000 <sup>20</sup>).

<sup>19</sup> The updated action plan on wildlife trafficking underlines the fact that no real progress can be made in the fight against wildlife crime if insufficient funding is available to support the accompanying actions, both at the EU level and in EU Member States: See European Commission, 2022 'Revision of the EU action plan against wildlife trafficking' (COM/2022/581)

<sup>20</sup> According to the 2019 Eurobarometer on biodiversity only 7% of Irish people had heard of Natura 2000 and knew what it is

## APPENDIX 5: Parks Canada

In Canada responsibility for the establishment and management of protected natural heritage areas (national parks and national marine conservation areas) rests with Parks Canada, the oldest national parks service in the world, created in May of 1911.

Through legislation introduced in 1998 the Government of Canada established the Parks Canada Agency, a corporate body reporting to Parliament through the Minister, Environment and Climate Change Canada. The Agency's mandate (remit) is to *protect and present significant examples of Canada's natural and cultural heritage and foster public understanding, appreciation and enjoyment that ensure their ecological and commemorative integrity for present and future generations.*

Parks Canada is responsible for the management of 47 national parks and reserves, one national urban park and 5 national marine conservation areas, encompassing over 450,000 km<sup>2</sup>. All protected heritage areas managed by Parks Canada must be representative of a specific “natural region” and are required by legislation to have management plans that are approved by the Minister and tabled in Parliament.

The maintenance of ecological integrity (ecosystem native species, biological communities, natural landscapes and biological communities are in tact and likely to persist) is the first priority when making decisions regarding the management of protected natural heritage areas managed by Parks Canada.

Key activities undertaken by the Parks Canada Agency in achieving its mandate include researching, monitoring and devising management actions and responses related to climate change, landscape connectivity, invasive species, species at risk, hyper-abundant species, wildfire impacts, contaminated sites, environmental impacts, human-wildlife interactions, illegal activity and habitat restoration requirements for protected natural heritage areas.

Both Parks Canada and the NPWS are strategically positioned to benefit from their designation as an “Agency” within their respective broader Government structures. The Parks Canada experience as an “Agency” over the past 25 years could perhaps inform NPWS deliberations and activities in delivering on its Strategic Action Plan. They have similar remits, the establishment, protection and presentation of protected natural heritage areas, both in the terrestrial and marine environments. Both organizations must work with others to establish protected areas and both must develop positive working relationships (partnerships) with others to be successful in managing protected areas over the long term.

There are established relationships between the two parks services, through a number of broad international bodies and initiatives. There is an opportunity to learn from and build upon the formal “twinning” of Connemara National Park with Terra Nova National Park in Canada through the signing of a formal agreement between the Governments in 2019.

## **APPENDIX 6: NatureScot**

NatureScot is Scotland's nature agency, with 30 years' experience advising the Scottish Government. The organisation was established as an executive non-departmental public body (NDPB) under the provisions of the Natural Heritage (Scotland) Act 1991. It works to enhance the natural environment and inspire the people of Scotland to care more about it. NatureScot brought together the Countryside Commission for Scotland and the Scottish element of the Nature Conservancy Council. The Deer Commission for Scotland (DCS) (the government agency responsible for deer) was merged with NatureScot in 2010.

NatureScot is a non-departmental Public Body (NDPB) accountable to Scottish Ministers and the Scottish Parliament. Its statutory purpose is to:

- secure the conservation and enhancement of nature and landscapes;
- foster understanding and facilitate enjoyment of nature and landscapes;
- advise on the sustainable use and management of nature and landscapes;
- further the conservation, control and sustainable management of deer in Scotland.

NatureScot sits in the Transport, Net Zero & Just Transition portfolio of Scottish Government, within the Environment and Forestry directorate. Most of the funding comes from the Scottish Government's Environment and Forestry Directorate as 'grant in aid'. To note the resource levels (in Appendix 3) are a snapshot at a point in time, and subject to ongoing change in line with evolving priorities.

### **National Parks & National Nature Reserves**

At present, Scotland has two national parks: Loch Lomond & the Trossachs National Park, created in 2002, and the Cairngorms National Park, created in 2003. Each is administered by a national park authority. Under the National Parks (Scotland) Act 2000, national parks in Scotland have four aims:

- To conserve and enhance the natural and cultural heritage of the area
- To promote sustainable use of the natural resources of the area
- To promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public
- To promote sustainable economic and social development of the area's communities
- 

NatureScot's role is providing advice to Ministers on the role and approach to national parks, and how nominations for new parks could be evaluated.

NatureScot manages 29 of the 43 promoted National Nature Reserves (NNRs) in Scotland. Scottish NNRs as a whole are overseen by the NNR Partnership, a group of representatives from the different managing bodies.