

Submission to the Draft

3rd Irish National Biodiversity Action Plan 2017 to
2021

By the Old Irish Goat Society

20-Jan-2017



Please find our observations and recommendations relating to the draft National Biodiversity Action Plan 2017 to 2021.

1. We are aware that the term “biodiversity” includes “genetic resources” and by extension “indigenous breeds”, however we believe that public and institutional thinking in Ireland has limited awareness of genetic resources being a fundamental part of our national biodiversity, with additional importance for food security and climate action and as such we request that this facet be given more emphasis and space in the document introduction section.

There are many examples to support this thinking;

- the Caldoir Sheep has slipped into extinction, in this decade, essentially unnoticed and undocumented
 - the Old Irish Goat and several other indigenous breeds remain officially unrecognised in Ireland
 - the UK is generally credited with saving the Irish Moiled and Irish Dexter
 - the disproportionately limited budget available to the Animal Genetic Resources Committee in Ireland
 - there is only one genetic resource orientated group in the Irish Environmental Network
 - there is no Genetic Resources NGO representation in the Biodiversity Forum or Group
 - there is no figure 4 style analysis of Ireland’s genetic resources conservation status included in the draft biodiversity plan
 - “Origin Green” as a key national indicator to food production sustainability, as we understand, does not speak to indigenous genetic resource conservation metrics
 - and while the second half of the CBD, objective one, speaks to genetic resources, the term “Genetic Resources” or its more familiar connotations does not feature in the twelve-page introductory section of the draft Biodiversity Plan, save for the CBD quote itself.
2. We request that the plan explain genetic resources and their specific value, this plan is a crucial opportunity to make people aware of undervalued agricultural genetic resources and its place in the wider context of agriculture, habitats and species.
 3. We request that the term “genetic resources” be included in the plan’s definition of biological diversity alongside “terrestrial, marine and other aquatic ecosystems”.
 4. We request that the national biodiversity plan make space for a specific objective 8 dedicated to “conservation of Indigenous Breeds and varieties for agriculture and food”
 5. With regard to “The State of Ireland’s Biodiversity” this section demonstrates the value of directives; we suggest that Ireland campaign for an “Indigenous Breeds Directive”.
 6. Further specifically there are no metrics on the state of Ireland’s Genetic Resources, we know for example that a number of breeds are threatened, we request these be noted.
 7. We note that the 2017-2021 draft, unlike the previous 2011 -2016 plan, does not specifically mention the “Precautionary Principle” as outlined in the Rio Declaration on Environment and Development and referenced in the Convention on Biological Diversity. This is especially an issue for Irish indigenous breeds as several are as yet not researched or recognised due to lack of resources. The Old Irish Goat Society, has worked for several years under the precautionary principle, with the support of the Animal Genetic Resources Committee. This

is something to recognise and highlight as a positive contribution in future national reports to the Convention, particularly when the breed is officially recognised. The inclusion of this principle is important because actors with vested interest will seek to dismiss the legitimacy of conservation without first proof of authenticity. We believe much of the research funded by the Agricultural Genetics Resources Committee comes under the principle. The principle and commitment to it should be upheld in this edition of the plan.

8. We recognise that the 2017-2021 draft refers to overarching Aichi Biodiversity Targets of which "Target 13" holds relevance, however we suggest that other international genetic resource polices such as the Interlaken Declaration, published in 2007, and the Agenda 21 Chapter 14, published in 1992, be referenced.
9. We request a specific capacity building program for Irish Genetic Resource groups.
10. We request a review of the National Genetic Conservation Strategy Document for livestock published in 2013.
11. We request the establishment of an Animal Genetic Resources Sub-Committee as recommended in the National Genetic Conservation Strategy Document published in 2013. This committee should strive to bring together a cross section of resources from breed societies, those with land and physical infrastructure, heritage conservation and public participation experience as well as scientists.
12. We request that the biodiversity plan target a €1,000,000 national fund to be secured for the Conservation of Genetic Resources Scheme, as opposed to the current €50,000 national budget distributed over five fields nationally; Plants (including aquatic plants), Animals, Forestry, Microorganisms & Invertebrates, Aquatics (Fish and Invertebrates), or proportionally some €10,000 per genetic resource sector per annum, from the proportionally vast resources within the RDP.
13. While "in 2013 Irish Aid allocated grants totalling €27,626,000 in respect of activities that were biodiversity relevant or had biodiversity elements. Of this fund around €13,000,000 was substantively biodiversity relevant", it could be argued that Ireland is exporting "*genetic erosion*" to 3rd world countries, which could have long term implications for food security in the host countries. Are there safeguards in place in the countries we export livestock into? As citizens we need accountability on this as the primary global risk to indigenous breeds is importation of exotic breeds. This critical issue reflects the need for a dedicated objective 8 for genetic heritage.
14. We request that the fund administered by the Animal Genetic Resources Committee be documented in a similar fashion to the Irish Aid Fund.
15. In the interim to achieving an "*Indigenous Breeds Directive*" we advocate that the plan seeks amendment of the Heritage Acts to afford protection to Indigenous Breeds. As for example although the Old Irish Goat is living heritage, of the same era as famous inanimate Neolithic monuments including the Céide Fields in county Mayo, Poul nabrone Portal Dolman in the Burren and the Megalithic Chamber Tomb, Bru na Bóinne in county Meath, the little known Old Irish Goat, with additional significance for food security and climate change, is not protected under the Heritage Act, or indeed any act. When we consider the challenges being faced by those species that are protected by law, what chance has our obscure genetic resources?
16. The Old Irish Goat is found in Irish feral herds across Ireland although its population still remains unknown. It represents a perceived threat to a biosphere site, an actual threat to

Irish UNESCO site ambitions in terms of mismanagement of feral herds harbouring OIG, yet, the goat, is embraced in the Dublin Bay Biosphere as a conservation grazer. An unrealised genetic resource and cultural asset whose origins date to Neolithic era which can add unique cultural authenticity to the Wild Atlantic Way and Ireland's Ancient East. With distinctive traits and 12 colour patterns, it has the potential to add value to or perhaps anchor a UNESCO World Heritage / Biosphere Site as a cultural asset and an eco-friendly alternative to herbicide based invasive species control. These opportunities cannot be fully assessed if the current status quo with regard to resources is to remain; we refer to recommendation 9 and 12.

17. The Old Irish Goat is threatened by commercial forestry e.g. Drumsnauv, the lack of official recognition and awareness by the national authorities in Ireland is a factor. Whereas the state has recently provided €550,000 in funding to boost tourism potential of commercial forests such that "forests, tracks and trails are ideal for lovers of the great outdoors, nature enthusiasts and those who want to explore Ireland's rich cultural heritage, which is woven into the fabric of the forests". In this instance the Precautionary Principle has been called on to stay the hand of the state in regard to indiscriminate culling of Old Irish Goats, a significant cultural resource to Connemara. With little resources available to help conservation of the Old Irish Goat in Drumsnauv, we refer to recommendation 12.
18. We request the plan provide a Figure 4 style analysis of indigenous breeds and their conservation status, in relation to the specific measures sought under the Agenda 21 Chapter 14 and principally that we 'guarantee their survival'. Have we sustainable populations of not "*improved*" indigenous breeds and can we prove it?
19. We recommend independent EPA style analysis of the conservation status of genetic resources, just like we have for habitats, species and water quality. In other words, we request to treat genetic resources to the very same standards as those enjoyed by our legally protected and directive supported biodiversity.
20. We request that the plan note positive results being achieved in genetic resources, to raise appreciation and awareness.
21. We request that the plan speak to the United Nations Sustainability Development Goal 15: "Life on the Land: Halt biodiversity Loss" which states that "Of the 8,300 animal breeds known, 8% are now extinct, 22% are at risk of extinction and 6 breeds are lost each month."
22. With regard to the EU target of "halting biodiversity loss by 2020 we request that the plan detail what metrics are being used to measure this goal and what the current trends are versus the resources deployed in the last two plans, with a view to assessing whether we are on target to achieve this goal.
23. We request that the plan include a resource section that details the financial and human resources allocated to the plan. These resources need to be benchmarked versus international best practice, e.g. UN guidelines in respect to aid, and EU norms and the minimum resources required to achieving national and international targets. The point is, are the agencies tasked with delivering biodiversity targets, fully staffed and resourced to deliver on international commitments, if not, these shortfalls need to be made clear to citizens and their public representatives.
24. On a technical note we request that the plan set out how the plan process has adhered to requirements of the Aarhus Convention.