



**An tSeirbhís Páirceanna Náisiúnta
agus Fiadhúlra**
National Parks and Wildlife Service



**An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta**
Department of Housing,
Local Government and Heritage

PUBLIC CONSULTATION SUBMISSIONS REPORT

Report on the submissions received from the public consultation on
Ireland's Invasive Alien Species Soil and Stone Pathway Action Plan
2023 - 2027

June 2023

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Background

Once established in a new region, invasive alien species can quickly spread and become extremely difficult, if not impossible, to control or eradicate. Their presence can result in detrimental impacts on wildlife, on the services nature provides, on our economy, and the way we live. However, the likelihood of establishment is largely governed by opportunities for initial introduction. As invasive alien species can be unintentionally transported in ‘habitat material’ such as soil and stone (including excavated/dredged spoil), action is needed to reduce the risk of introducing and spreading invasive alien species among habitats in Ireland by this pathway.

The development of action plans to tackle priority pathways of unintentional introduction and spread of Invasive Alien Species of Union concern in Ireland is a requirement under the EU Invasive Alien Species Regulation. This Pathway Action Plan targeting the transport of invasive alien species in soil and spoil material, is one of a series of plans intended to reduce the risk of introduction and spread of invasive alien species in Ireland.

In 2022, the Soil and Stone Pathway Action Plan Working Group was established to draft Ireland’s Invasive Alien Species Soil and Stone Pathway Action Plan 2023 – 2027. The Pathway Action Plan outlines the general policy approach to tackling this pathway and what actions government and those involved with excavation, transportation, recovery, reuse and disposal of habitat material in Ireland can undertake.

To provide an opportunity for all interested parties to make their views on these Pathway Action Plans known, the Department of Housing, Local Government and Heritage launched a Public Consultation on 4th May 2023. The draft Pathway Action Plan was made available for download from the National Biodiversity Data Centre’s invasive species website from <https://invasives.ie/biosecurity/pathway-action-plans/> where supporting consultation documentation and additional information on pathway action plans was also made available. The consultation process ran for 4 weeks from 4th May 2023 until 1st June 2023 (inclusive).

This paper provides a summary of the views and opinions offered by stakeholders through the Public Consultation process.

Summary of submissions

Four submissions were received. These were from the:

- Chartered Institute of Ecology and Environmental Management (CIEEM)
- Clare County Council
- Environmental Protection Agency (EPA) - Circular Economy Regulation Team
- Gas Networks Ireland.

The summary of submissions is presented in two sections: Chapters of the Plan and Key Actions. Within the Key Actions section, the submission feedback is presented within the five headers of: Best Practice; Policy; Raising Awareness; Reporting; and Knowledge Gaps.

Chapters of the Plan

This section gives a summary or copy of the points raised in the submissions related to the main chapters of the Pathway Action Plan.

Description of the target pathway

Submission comments:

- In some instances, the data reported is from the reference year of 2018, foot noted *The Construction and Demolition Waste Statistics for Ireland (2020)*. Latest reference year: 2018. It appears there is a more recent reference year now available (2020), and perhaps can be considered as more representative. For example: *Construction & Demolition Waste Statistics for Ireland EPA waste data release 26 October 2022*.

Policy and legal context

Submission comments:

- It would be worthwhile expanding this section of the document. While the legislative instruments are important at regulatory level, government departments are responsible for devising and implementing their own internal policy procedures. Usually, a Standard Operating Procedure (SOP) is developed to implement policy through actions. A clear policy and SOP in relation to the unintentional spread of invasives through earthworks in terrestrial and aquatic ecosystems for example, should be referenced in the Action Plan.

Identification of Key Stakeholders

Submission comments:

- Add CIEEM to the list of Key Stakeholders on page 10.

Appendix I – Working Group Members

Submission comments:

- CIEEM acknowledges the presence of organisations such as NPWS and NBDC on the Working group and the expertise they bring.
- Inclusion of CIEEM in some capacity in the activities of the Working Group moving forward.

Key Actions

This section gives a summary or copy of the points raised in the submissions related to the Key Actions of the Pathway Action Plan. To provide context to the submission comment, for each key Action where a submission comment was received, a copy of that Key Action is given. The aim, outcome of the Key Action section and the table of leads, partners, key stakeholders and timeline for each key action is not pasted here. Please refer to the [draft Soil and Stone Pathway Action Plan](#) to read the Key Actions in full.

Best Practice

Key Action 1– Developing guidelines for good practice. The Soil and Stone Pathway Action Plan Working Group will coordinate development of a core biosecurity measures guidance document.

This can act as a basis for development of sectoral guidance documents tailored to policy and authorisation requirements by individual sectors.

Submission comments:

- Given the experience of the CIEEM members, they could provide valuable input to guidance documents being developed under Action 1.
- It is important to communicate invasive species best practice measures to community focus groups and community conservation initiatives such as tidy towns. Many of these organisations are involved in habitat enhancement measures such as pond creation, etc. and may not always have ecological expertise in spoil management and invasive species. Training is required to highlight the correct management of spoil; and identification of pathways where invasive species could spread when working on conservation led and development led projects within communities. It may be worthwhile in developing a grant aid scheme aimed at providing training to community groups in relation to spoil management and invasive species.
- All Local Authorities need to produce 'Biodiversity Best Practice Guidelines'. The guidelines should encompass a section dedicated to invasive species. Such a guidance document can be circulated to project managers and workers on construction related projects within Local Authorities. This can reduce the risk of the unintentional spread of invasive species.
- The Action Plan could reference 'essential skills' training that could be written into 'terms and conditions' of tenders/contracts whereby construction companies that are awarded local government contracts could undertake satisfactory training in relation to soil management and invasive species prior to the commencement of contract work.
- Essential skills training to be provided to local authority staff in relation to the spoil management and invasive species and identification of pathways.

Policy

Key Action 2 – Adapting the regulatory framework. To reduce the risk of the spread of invasive alien species by off-site movement of soil and stone, dredged/spoil material and associated vectors (machinery, vehicles etc.), the Soil and Stone PAP Working Group will review the need for amendments to existing waste legislation to enable authorities to adapt the existing waste authorisation framework to improve or introduce standards and checks on biosecurity measures. This may include:

- a) Adding conditions to facility permits and collection permits - with checks for sign-off - that the material is invasive alien species free before going for reuse or recovery.
- b) Introducing a more efficient authorization process for onsite waste disposal options for known invasive alien species contaminated material in line with recommendations from appropriate experts.

Submission comments:

- CIEEM welcomes Action 2 and agrees that standards and checks on biosecurity measures should be introduced.
- Suggestion for CIEEM to be added to the list of key stakeholders under Action 2.
- This review should be undertaken with open consultation.
- Suggest the removal of 'reuse' in the following sentence and adding recycling to end of this sentence: 'Adding conditions to facility permits and collection permits-which checks for sign-

off- that the material is invasive alien species free before going for reuse or recovery or recycling'.

- It would be worthwhile expanding this section of the document. While the legislative instruments are important at regulatory level, government departments are responsible for devising and implementing their own internal policy procedures. Usually, a Standard Operating Procedure (SOP) is developed to implement policy through actions. A clear policy and SOP in relation to the unintentional spread of invasives through earthworks in terrestrial and aquatic ecosystems for example, should be referenced in the Action Plan.

Key Action 3 – Environmental Protection Agency update of waste and by-product guidance documents

The Environmental Protection Agency (EPA) will provide further clarity regarding the appropriate management and prevention of invasive alien species at construction and demolition development sites and at authorised soil recovery facilities.

Submission comments:

- Adding to Action 4 c: iii National End-of Waste-Criteria; and iv. Single case End-of-Waste decisions.
- Slight re-wording to action text.

Raising Awareness

Action 4 – Development of sectoral biosecurity awareness campaigns

Representative groups, advisory bodies or authorities as appropriate should develop a biosecurity awareness campaign for their members/sectors. In particular, the following sectors will be targeted:
- Farmers - Landscapers - Digger/excavation drivers - Builders.

Possible routes of elevating awareness may be through adding an invasive alien species and biosecurity module to existing training systems such as: - SOLAS Safe Pass or other appropriate courses - Toolbox talks on construction sites - Leave No Trace courses - Green Cert agricultural course.

These campaigns will likely build from the guidance produced in Action 1.

Submission comments:

- Develop an invasive species working group for public authorities to share knowledge and address information gaps and enhance awareness with key stakeholder groups. [This comment also pertains to the Key Action - Knowledge Gaps section.]

Reporting

Key action 5 – Reporting the presence of invasive alien species

A general reporting hierarchy for communication on a list of priority invasive alien species will be published on www.invasives.ie. The list will be dynamic, and periodically reviewed and updated.

Submission comments:

- CIEEM agrees with Action 5 of the plan and would suggest being added to the key stakeholders of this action.

- CIEEM anticipate a role in raising the standards and practice in their sector for this area and would be happy to work with the National Biodiversity Data Centre, where they can, to do so.

Knowledge Gaps

Action 6 – Close knowledge gaps that are vital to support development and implementation of Actions 1-5

Knowledge gaps identified by the Soil and Stone Invasive Alien Species Pathway Action Plan Working Group include:

- a. What, if any, of the priority invasive alien plant species and parts thereof can be composted?
- b. Implementation of permit authorisations need to be assessable and enforceable. Explore methods for aiding inspection of declared invasive alien species free soil and stones and dredged/spoil material. Consider sample size and frequency, list of invasive alien species for detection, holding procedures etc.

Submission comments:

- Regarding Key Action 6 a: Theoretically digestion of invasive alien plant species is possible in Anaerobic Digestion (AD) plants, however site specifics such as licensing and economics etc will be a determining factor at each AD operation. It is expected that most AD plants to be developed in Ireland will be Agri-AD plants, optimised to digest grass silage and slurry. They are expected to be mesophilic operations (30-38 degrees C) which would mean longer digestion times especially for wet and/or woody plants like recently excavated invasive alien plant species. However, notwithstanding some of the challenges that invasive plant species bring, they should be digestible at some capacity or volume within some AD plants. Thermophilic AD plants that operate at notably higher temperatures (temperatures at 50 degrees C or above) may offer a better option and could be more suitable for invasive alien plant species digestion. Licensing and handling requirements would also be required at thermophilic AD plants. In addition, confidence of full digestion would need to be established to ensure that the digestate (a by-product from the AD process which is intended for use as a biofertilizer) is not in any way contaminated.
- Public Authorities to commission regional wide invasive species surveys and incorporate the results as a shapefile to be used on public authority GIS systems. The database should be accessed by project managers prior to implementing/tendering/outsourcing construction related work to highlight the locations of invasive species within locations subject to earthworks.
- Develop a centralised database within public authorities to record incidental records of invasive species by internal personnel.

Acknowledgement and Next Steps

The Irish Government is very grateful to all those who took the time to respond to this consultation. The submissions will inform the deliberative process in finalizing the pathway action plan by the Soil and Stone Pathway Action Plan Working Group and help to inform the Irish Government's consideration of the way forward.

This Public Consultation Report will be sent directly to all those that made submissions and made publicly available from: <https://invasives.ie/biosecurity/pathway-action-plans/>. Each consultee that made a submission will be informed directly on how their submission comments were considered in the final version of the Pathway Action Plan.

Final version of Ireland's Invasive Alien Species Soil and Stone Pathway Action Plan 2023-2027 will be published on <https://invasives.ie/biosecurity/pathway-action-plans/> with notice of publication issued through the Department of Housing, Local Government and Heritage and the National Biodiversity Data Centres' websites and social media accounts.



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