

26.9.25

Submission from Ireland's Independent Advisory Committee on Nature Restoration to the public consultation on the EU Nature Credits Roadmap

The Independent Advisory Committee on Nature Restoration in Ireland (RestoreNature.ie) welcomes the opportunity to contribute to EU discussions around nature credits as part of the Nature Restoration Regulation and the drafting process of our national Nature Restoration Plan. We have taken the opportunity to identify a series of concerns and issues that we believe require clarification. We would appreciate it if these could be considered by the Commission as it develops its work in this area.

We believe that, as a public good and a legal obligation, the primary responsibility for funding nature conservation and restoration falls to public institutions and national governments. The provision of public funding for nature is essential and this will continue to be the key source for many decades to come. However, we acknowledge the potentially important role that private finance has to play in complementing public funding to drive nature recovery in the EU and globally.

We are also aware of the large body of scientific research that has been developed over decades, and note that studies have shown that nature markets regularly do not achieve their environmental objectives. A cautious, evidence-based approach to developing private finance mechanisms is therefore vital to ensure credibility, integrity, long-term sustainability and nature-positive outcomes that benefit all parties, including farmers, fishermen and others whose livelihoods are directly dependent on the natural environment.

We are concerned that the Roadmap does not explain how nature-positive outcomes will be defined, or by who. It is essential to ensure that any indicators and metrics that inform Nature Credits correlate strongly with desired outcomes for nature in a meaningful and ecologically-relevant way. We would ask that the Commission considers in detail how this can be guaranteed. We would also welcome clarity on whether credits will be scaled on the basis of ecological, financial or administrative viability, and who would make those decisions.

Connected to this is the question of data. We ask that the Commission is clear about what will be done in circumstances of data-deficiency, where we do not know enough about species, habitats, or their interactions in ecosystems, including at relevant scales, to ensure that metrics and indicators are reflecting society's intended outcomes for nature - which may

be broader or more complex than a metric or indicator is able to capture - and how we can avoid an over-reliance on models and estimates that may not give a true evaluation of what can be expected.

We also have concerns around how the credits themselves will be generated, certified, independently verified and audited, by who, and how transparency and accountability will be ensured and greenwash prevented. This includes the on-the-ground delivery mechanisms that interact with private providers of nature-positive outcomes in agricultural, forest, marine and urban ecosystems, and also in the Natura 2000 Network on land and sea. If Nature Credits are to become standardised at regional or national level, it is vital to set out how questions of quality and integrity will be dealt with and address the potential constraints, including human resources and the availability of expertise.

We would welcome clarification around issues of additionality and how this connects to existing measures for biodiversity conservation and restoration that are currently provided for through public spending such as CAP payments and forestry grants. Furthermore, we believe it is vital to set out clear guidance on how non-deterioration will be guaranteed, including the long term monitoring mechanism necessary to ensure it and the mechanisms to enforce non-compliance.

Lastly, we note that the Roadmap states demand-drivers “could” be explored, and that regulatory tools are mentioned as one such driver. We are mindful of scientific research suggesting that voluntary schemes are less effective than mandatory ones and that strict regulations are necessary to prevent leakages. We would welcome an evidence-based assessment of these issues and clarity on how they will be addressed. We would also welcome clarification on the role of the Mitigation Hierarchy (as outlined in Article 4 Paragraph 6 of the Habitats Directive) in any such regulations or best practice guidelines, including in circumstances where Nature Credits are used for offsetting.