

Environment Strategy for Northern Ireland

Public Discussion Document

Stakeholder Response Template



September 2019

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Department of
**Agriculture, Environment
and Rural Affairs**

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How to Respond

This template replicates the questions posed in the online survey on the Environment Strategy for Northern Ireland Public Discussion Document found at: <https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document>.

However, while the online survey includes additional information to assist respondents, the full text of the consultation can only be found on the Department's website by following the link above or by contacting us to request a hard copy. It is recommended that you should read the full consultation document before completing your response, whether you choose to use this template or the Citizen Space Hub.

If you wish to use this template for your response, please reply by e-mail or hard copy respectively to:

esni@daera-ni.gov.uk

or

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Regulatory and Natural Resources Policy Division
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Early responses are encouraged but all responses should arrive no later than **5pm on Monday 23rd December 2019**. Before you submit your responses please read the "Freedom of Information Act 2000 - Confidentiality of Consultation Responses" section below, which gives guidance on the legal position.

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For further information about confidentiality of responses, please contact the Information Commissioner's Office:

Tel: (028) 9027 8757

Email: ni@ico.org.uk

Website: <https://ico.org.uk/>

ABOUT YOU

Organisation (if applicable)

Ulster Wildlife

Please note that the text boxes used throughout this template will expand to accommodate your response – there is no character limit.

Q1: Do you agree that the Environment Strategy should sit alongside existing Executive-endorsd strategies, such as the Sustainable Development, Public Health and Economic Strategies?

Yes

No

Comments

A healthy well cared for natural environment is a basic human right and one of NI's greatest assets. This is the foundation for our prosperity, health and well-being and an important factor in attracting inward investment. As such, it is **essential** that the Environment Strategy sits alongside other Executive endorsed strategies and that the fundamental principles and outcomes contained within are given the prominence they deserve due to the intergenerational impacts for local communities across NI.

In our view, the Executive should also underpin all regional strategies by a Future Generation Act (similar to the Welsh legislation) setting out guiding principles to govern the use of natural resources and environmental decision-making processes, thereby safeguarding our environment for the long term.

We would also highlight the importance of the environment strategy within the Brexit process. The EU has clearly highlighted that any future trading agreement will require equitable environmental standards with all EU members. As such, this will be a key success factor moving forward and a pre-requisite to market access.

Given the fundamental role the environment plays within society, structures for effective governance are critical. NI's is one of only two EU countries without an Environmental Protection Agency (EPA). This is not a track record to be proud of and needs to be addressed. As a post conflict society, it is time to move forward, learning from other regions that value and protect their natural capital assets and biodiversity. It is encouraging to see the formation of an EPA in the NI Assembly's New Decade, New Approach agreement. However, already it is being referred to as 'aspirational' by the DAERA Minister and whilst we appreciate the financial challenges faced by the Executive, effective governance structures need to become a reality if progress is to be achieved.

We believe that it is important that the remit of the Office of Environmental Protection is extended to NI providing an impetus for action and fulfilling a quality assurance function that was previously undertaken by the European Court of Justice.

The United Nations and other international institutions are warning that we have only 12 years to avert a climate catastrophe and the recent IPBES report (<https://ipbes.net/global-assessment-report-biodiversity-ecosystem-services>) found that "nature is declining globally at rates unprecedented in human history – and the rate of species extinction is accelerating, with grave impacts on people around the world now likely." **Complacency is not an option.**

Locally, the 'State of Nature 2016' highlighted that the UK is one of the most nature-

depleted countries in the world and Northern Ireland is the most nature-depleted part of the UK. The 2019 Report shows no reduction in the loss of wildlife - "Of 2,450 species in Northern Ireland that have been assessed using IUCN Regional Red List criteria, 11% have been classified as threatened with extinction from Ireland as a whole". In the UK Marine Strategy Assessment (Part One) - 11 out of 15 indicators for healthy seas remain unmet.

Therefore, the Environment Strategy must sit at the highest level and be an Executive-endorsed strategy implemented through cross-cutting departmental actions, effectively engaging key stakeholders and the public to play their part. There also needs to be a reprioritisation of investment by the NI Executive to address environmental concerns and build the capacity of the public to play their part in addressing/preventing environmental issues.

In addition, we believe it is fundamental that an Environment Bill (or similar) for Northern Ireland is enacted to give the Environment Strategy a binding, legal footing with SMART targets and indicators. Failure to do so will mean the document will lack 'teeth' and remain largely ineffective along with a host of other strategies such as the NI Sustainable Development Strategy and the NI Biodiversity Strategy.

To encourage and support cross-departmental implementation of the Environment strategy, it needs to be under-pinned by environmental principles including polluter pays, precautionary principle, proximity, access to justice, and integration. The necessary ambition contained in the Environment Strategy should be fully costed and must be financed sufficiently into the future.

The final strategy must take account of the climate and ecological emergency we are currently in and recognise the scientific evidence that "Only through 'transformative change', can our environment and nature still be conserved, restored, and used sustainably. By transformative change, we mean a fundamental, system-wide reorganisation across technological, economic, and social factors."(<https://ipbes.net/global-assessment-report-biodiversity-ecosystem-services>)

The Environment strategy could be a once in a generation opportunity to bring about the transformative change that we and future generations need. However, this will only happen if we end up with an ambitious Environment Strategy for Northern Ireland with measurable, binding, time-bound targets for safeguarding our natural life-support systems: a plan that reflects the true value of nature to our well-being and economy and the urgency of the transformative change required right across society.

Q2: Do you agree that these broad environmental areas are appropriate for the Environment Strategy?

Yes

No

If "No", what alternatives would you like to see included?

In general, we agree with the proposed broad areas for the Environment Strategy, however that the area of food and farming is missing from the document. We note that fisheries and aquaculture are included but food production on land is not. With 75% of Northern Ireland under agricultural management it is essential that this is integrated within the Strategy. Given the importance of agriculture and land management in terms of impact on the environment, their contribution to the achievement of national emissions and water quality targets, combined with the potential for land management practices as a mechanism for increasing food security, restoring nature biodiversity and mitigating against climate change, we would ask that this is included.

Of note, in England's 25-year environment plan (25YEP), a future environmental land management Scheme is established as a key tool to deliver the Government's vision of cleaner air and water; thriving plants and wildlife; and a cleaner, greener country for us all.

By including this in the strategy, it signals the way forward in developing an integrated approach to agri and environmental policy and provides an opportunity to ensure that agriculture and land management practices play a key role in meeting a portfolio of environmental commitments, and by doing so deliver the aims of the strategy.

This would help set a clear direction of travel for agriculture and land use and create strong linkages between relevant land use policies and the environment strategy, whilst recognising the important role that these sectors have to play in securing nature's recovery.

The theme 'Marine Environment' should be changed to 'Marine and Coastal Environment'. The themes of marine and coast are distinct, with their own set of issues and management challenges despite the overlap and intrinsic nature of the two, and the Strategy should be changed to reflect this. It is also important to define the coastal environment. The strategy also needs to address the importance of integrating terrestrial and marine/coastal measures. Eg regarding estuarine water quality. We would also stress that NI marine areas are some of the richest in the UK.

Other Comments

Q3: Do you agree that these are appropriate strategic themes for the Environment Strategy?

Yes

No

If "No", what alternative or additional themes/issues would you like to see in the strategy?

The content of the themes are appropriate but we think that the language used is potentially confusing and that the use of 'Plain English' terms such as 'Recovering Nature' and 'Connecting People to the Environment' as included in England's 25-year environment plan (25YEP) would make the Strategy easier to understand and more engaging, particularly for those outside of DAERA. The strategic themes as written are open to interpretation and it would be useful to map these across to the IUCN Sustainable Development Goals.

We believe that climate change and biodiversity/nature recovery should have their own separate themes given the climate and ecological crisis we are facing. It is imperative that we do not find ourselves in the same position as the 2016-2020 Biodiversity Strategy which achieved little to none of its strategic aims.

Other Comments

Q4: Do you have any comments on what specific issues should be included under a proposed Environmental Engagement strategic theme?

Within the section on Environmental Engagement, the focus on public engagement is inward focused primarily covering interaction between DAERA, public bodies & the CAFRE Knowledge Advisory Service. Given the scope and reach of engagement undertaken by eNGOs, it is very disappointed that this is not recognised in the document and there is little reference to partnership working which can provide an effective low cost delivery mechanism where strategic partnerships are formed.

Successful environmental engagement requires an understanding of all key stakeholders and it would be beneficial to establish a framework for measuring the success of environmental engagement in Northern Ireland, such as an 'engagement index'. An example of an environmental engagement index is the '*Monitor of Engagement with the Natural Environment - Natural England*'.

Radical behavioural change is needed across Northern Ireland if we are to start living within the capacity of our natural environment. The strategy should therefore include actions to develop and implement programmes of awareness raising on

issues such as consumption, waste, transport, nature and climate. This should include broader public awareness programmes and more targeted actions through engaging children and young people, farmers and land managers. We should also consider further regulatory changes or 'environmental levies' that drive behavioural change ie the introduction of plastic bag levy has dramatically reduced plastic bag use. A fuller awareness of nature recovery and built-in resilience should be embedded within the Planning Service.

Children and Young People

Ulster Wildlife believes that a close connection to the natural world should be at the heart of education and learning. We believe that DAERA should work closely with the Department of Education to ensure the implementation of an Environmental Education Strategy for Northern Ireland that includes environmental awareness and citizenship as part of the school's curriculum. We would support introducing a Natural Heritage GCSE; providing a better understanding of key environmental issues and responsible citizenship. We also think that funding should be provided to make it easier for schools to take pupils on regular trips to natural spaces. The Wildlife Trusts commissioned research published in 2019, that showed that after participating in supervised outdoor activities in nature:

- Children showed an overall increase in their personal wellbeing and health, with the greatest improvement being in those who initially reported low levels.
- Children showed an overall increase in nature connection over time.
- Children demonstrated high enjoyment levels, and were motivated and engaged.
- Children showed an overall increase in pro-environmental values. These values were expressed as support for the protection of plants, animals and the environment, recycling, and reduction in energy and water use.

(<https://www.wildlifetrusts.org/sites/default/files/2019-11/Nature%20nurtures%20children%20Summary%20Report%20FINAL.pdf>)

Recent research from The Princes Trust found that -

- 44% of young people in Northern Ireland say they have experienced a mental health problem.
- 68% of young people in Northern Ireland revealed they always or often feel stressed.
- 60% of young people in Northern Ireland said they always or often feel anxious.
- And 33% of young people in Northern Ireland reported they always or often feel hopeless.

Our modern lives have shifted dramatically indoors, with fewer and fewer people being outdoors regularly, particularly children and young people. Our connection to nature is fundamental to a healthy lifestyle and even small amounts of exposure to the natural world can enhance our mood. Daily contact with nature is linked to reduced levels of chronic stress, reductions in obesity and improved concentration. Research shows that nature-based activities reduce anxiety and many lower level mental health conditions whilst also improving physical fitness and general health and wellbeing. The young people within our Grassroots programme want to change government guidance to schools to include a minimum of one hour per school day to be spent outdoors in wild play and learning. Children's access to nature can be limited by their location and various other barriers. For some children, spending time in nature with their school may be their only opportunity, and contribute positively to

many aspects of the national curriculum. Additionally, this can provide enjoyable and beneficial experiences and lead to improved mental wellbeing. Every child and young person should have the opportunity to learn outside at school.

Farmers and Landowners

Increasing environmental knowledge and engagement within the agriculture sector will be crucial in the delivery of the outcomes of the Environment Strategy. This will ensure that farmers and land managers know better how to incorporate the needs of nature and the environment into their businesses.

Cultural shift needs to be addressed through policy change supported by capacity building. This should be addressed in a range of ways using partnership approaches where appropriate such as EFS Group Facilitation which has proved to be successful providing an independent farmer centric service. CAFRE mechanisms are obviously an important part of the mix, however third party interventions have proved very successful and this has not been included in the document.

Historically, traditional capacity building structures have not delivered for the environment and market failure applies. A fresh approach is required.

Engaging with Young Farmers groups can also help to embed environmental management principles from a younger age. This is important in preparing the sector for the future.

Agri-environment support measures should be co-designed with farmers needs and issues in mind, be largely carbon and biodiversity-focused and move from being so rigidly prescriptive as to be unattractive, to being outcome-based.

Q5: Do you have any comments on what specific issues should be included under a proposed Environmental Prosperity strategic theme?

The main concepts under this theme seem to relate to economic prosperity rather than environmental prosperity. We believe this terminology is unclear in its meaning.

We agree with the statement (P19) that '*There is a tremendously close, some would say symbiotic, relationship between the environment and the agri-food sector, each with the potential to significantly impact the other*'. We must ensure therefore that environmental and agricultural policies are not developed in isolation from each other, risking perpetuation of apparent competing visions and perceived priorities and drivers. Failure to integrate policies can result in major long-term negative implications for the environment such as those resulting from implementation of the Going for Growth Strategy which saw a drive to expand the agri-sector without due regard to the environmental implications. We therefore endorse the recommendations of the 2019 Food, Farming & Countryside Commission Report *Lay of the Land* (Northern Ireland). This Report outlines the need for a 'transformation in our food and farming system in order to respond to the climate emergency and restore biodiversity.

Our land resource is in huge demand. There is pressure for housing, food production and infrastructure with almost all our land now managed and modified in some way, leading to major loss of wildlife and habitat. Development of a Land Use Strategy for

Northern Ireland (in tandem with the Planning Service) which enables landowners, individuals and communities to make the best use of our land and landscapes should therefore be a key outcome of the Strategy. A Land Use Strategy could facilitate a strategic approach to land management and could help alleviate land use conflicts and ensure that land continues to provide goods and services to society while minimising adverse impacts on the natural resource (land) base. As part of this we would like to see in the development and delivery of a 'Nature Recovery Network' across the Province. This is a NI-wide ecological network map for nature - a spatial plan that identifies and creates the corridors and areas of habitat wildlife needs to move in response to climate change. We know that in order to make enough space for nature to allow it to recover from huge losses over the past 50 years, we need to create more places for wildlife to live, over bigger areas, manage these better and join them up.

A legally-binding network for nature would mean that wildlife is integrated when managing our land and planning our towns and villages. Local Nature Recovery Maps would inform future planning and environmental subsidies for farmers, turning nature's recovery from an aspiration to a reality. We also need to embed a 'biodiversity net gain' principle for housing and infrastructure developments – putting in place planning policies that make it mandatory for new developments to leave biodiversity in a better state than before. It is well known that communities sited in wildlife-rich, natural places are in general happier & healthier.

We support the development of truly sustainable fisheries in our waters where we have implemented an ecosystem-based approach to fisheries management underpinned by an updated Fisheries Act that commits to ensuring that fishing does not exceed Maximum Sustainable Yield. This will ensure that our wild fish populations and the wider marine habitats and species that support them can recover. We also call for the urgent implementation of fisheries regulations within all our existing MPA's. We should also be adopting an ecosystem based marine plan as a matter of urgency to ensure that development within our seas is sustainable. The NI network of Marine Protected Areas must be completed by designating protection to the habitats and species identified as gaps in our current network (JNCC 2018 – NI MPA Network Progress Report). Management plans and measures must be implemented to ensure this network is effective in protecting and enhancing our marine environment.

Q6:

Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?

In order for Northern Ireland to have '*a key leadership role in demonstrating to the rest of the world what is possible*' significant action on climate change must be taken.

Northern Ireland is currently lagging behind the rest of the UK and Ireland in relation to action on climate change & biodiversity. On many policy issues, NI is perceived as a backward inward looking nation that is still embroiled in conflict issues from the past which are detrimentally impacting on present and future policy priorities. To be a 'world leader' there is a need for commitment, more targeted investment and higher, sustained levels of skills and expertise. It is untenable that Northern Ireland does not have a Climate Change Act and we look forward to its introduction by the NI Assembly.

The Marine Climate Change Impacts Report 2020 shows clear evidence that warming seas, reduced oxygen, ocean acidification and sea-level rise are already affecting UK coasts and seas. Oxygen concentrations are expected to decline more than the global average across our seas with implications for biodiversity, food webs and fisheries productivity. By 2100, sea levels in Belfast are predicted to rise by up to 0.58m (in a low emission scenario) to 0.94m (in a high emission scenario) relative to 1981-2000. This will have negative consequences for coastal and intertidal habitats and coastal communities.

NI Climate Change Legislation should be introduced as a matter of urgency and include:

- Emissions reduction targets based upon the most recent scientific evidence and at least matching UK legislation and that in other UK jurisdictions;
- Interim targets and carbon budgets (over five-year periods);
- Creation of a NI Committee on Climate Change (similar to UK Committee)
- Sectoral emissions reduction plans with binding targets eg agriculture - Encouraging tree planting and agro-forestry in appropriate locations such as improved land and where specific environmental issues such as flood mitigation, ammonia deposition, transport etc
- A clear target to decarbonise our energy supply and achieve net zero carbon emissions by 2040.
- It should legally be embedded in the Sustainable Development, Public Health and Economic strategies. IE it should not just be left as a 'stand-alone' law in its own right but should be cross-cutting.

Given the urgency of the situation and with countries around the world committing to act to limit global temperature rises to 1.5°C, reducing greenhouse gas emissions and preventing climate change must be a key priority of the Environment Strategy, not just this theme. It is imperative that both technological, and nature-based measures be considered.

We need sectoral plans with binding targets eg agriculture, transport etc to accelerate the decarbonisation of our economy and society and should be investing heavily in nature-based solutions including a significant increase in peatland restoration, tree planting, our 'Blue carbon' coastal ecosystems (e.g. seagrass meadows, saltmarsh, tidal wetlands etc) which have been proven to store more carbon, for longer and at a quicker rate than terrestrial-based carbon habitats.

Peatlands

NI contains a hugely significant peatland resource in UK terms.

The Environment Strategy needs to halt further degradation of our internationally significant peatlands, and prioritise conservation, early intervention and restoration of these habitats. The NI Environment strategy should demonstrate a commitment to protecting and enhancing the wide range of ecosystem services peatlands offer, and returning these habitats to net carbon sinks.

- Creation of a NI Peatland Strategy that recognises the wide range of services these important habitats deliver for society and prioritises their protection and restoration with specific targets for the 95% of the habitat area under positive management and under restoration to achieve a favourable state.
- Provision of sustainable long-term funding for peatland restoration and conservation to support and empower landowners and land managers to work in partnership with specialist technical expertise based on best practice methodology for peatland restoration.
- Implement a long-term monitoring framework for restored peatlands
- Ensure future agri-environment schemes prioritise and appropriately incentivise the sustainable management of these habitats, to maintain existing peat deposits and intact active peatland habitats.
- Facilitate capacity building to increase awareness of sustainable land management of peatland habitats.
- End the use of peat based horticulture products; support the industry to implement responsible sourcing of sustainable peat replacements and develop new market opportunities.
- Ensure land use policies protect deep peat and that afforestation and reforestation on blanket bog and deep peat is prohibited. Demonstrate and communicate to the wider public the benefits of healthy peatland landscapes and peatland restoration, working alongside local stakeholders to end the unsustainable management and exploitation of these habitats.
- Protect peatlands from inappropriate infrastructure and other developments.

Waste / Plastic Pollution

Resource management forms the basis for the UN Sustainable Development Goal 12 (12.3 and 12.5). The SDGs are cited as key drivers within the draft strategy. Addressing and meeting the goals will require sufficient commitment and resourcing and can also create the basis for this aspect of the draft strategy.

Resource management is cited as a key aspect for maintaining the fullest use of existing resources rather than take, use and dispose. Ulster Wildlife strongly supports this approach in principle and through its own operating policy and practice. Noting that the reference made in the draft strategy has a strong relevance to materials and their consumption, the integration of this purpose into the development and operation of a circular economy is encouraged and considered essential. The other aspect of resource management not specifically mentioned under this heading, especially in the context of sustainable consumption and production, relates to the need to develop and operate an effective, environmentally and economically prosperous food system. As outlined in the RSA Food and Farming report and recommendations, and stated in WRAP's Food Futures report (<http://www.wrap.org.uk/content/food-futures>), losses in food production can result in significant adverse carbon impacts, notably more, by orders of magnitude, than further down the supply chain towards consumption (<http://www.wrap.org.uk/content/retail-survey-2019>). Committing to work to improve resource efficiency and reduce waste in agri-food systems should be a priority and be a critical factor in future land use policy consideration – particularly

where a proposal to increase food production, where any inefficiencies had not first been avoided, could conflict with preventing biodiversity loss.

Plastic pollution continues to damage our marine and coastal habitats. The 2019 Northern Ireland Environmental Statistics Report showed that an average of 6,250 items of litter was observed per kilometre in 2017/18 - this is a 43% increase from the previous year. In 2018, 72% of all marine litter recorded was made of plastic. Marine litter has an estimated yearly loss to NI beach amenity value of £36 million (KNIB Marine Litter Report 2018). The plastic bag levy has demonstrated the positive changes that can be enforced but more needs to be done to significantly reduce the use, in particular, of single use plastics. In December, a sperm whale washed up on the coast of Scotland was discovered to have approx. 100kg of marine plastic and debris in its stomach. Microplastics have been found to reduce feeding rates (and therefore energy availability) in marine invertebrates and there are increasing concerns around the role of marine plastics as a source of endocrine-disrupting chemicals, impacting the ability of marine mammals to reproduce successfully.

Actions could include:

- Higher penalties for fly-tipping
- Audit of recycling by councils and others
- Education of the public
- Stronger incentives to reduce plastic bag and other plastic use
- Dialogue with retail/supermarkets to reduce plastic packaging
- Polluter really does pay
- Mandatory clean-ups at fishing ports

Q7: Do you have any comments on what specific issues should be included under a proposed Environmental Quality strategic theme?

We broadly agree with the issues included under this theme. However, the Strategy must contain ambitious goals/ targets for these issues. To ensure this is the case and in order to make a real difference each issue (Air, Water Quality, Biodiversity etc.) must be:

- Accompanied by SMART goals and targets to ensure they were measurable and time bound with clear milestones and identified responsibilities on named departments/officials to deliver.
- 'New' – it is important to avoid being merely repeats of existing commitments/targets already made in other policy or agreements that we are currently failing on. We have for example failed to meet our target of halting biodiversity by the previously agreed dates of 2010, 2015 and we are failing to meet our 2020 target. Therefore, merely identifying a further date without ambitious and enforceable compulsory targets is likely to achieve the same poor results.

In relation to Biodiversity, the UN has identified the top five drivers for declines in nature which are:

- Direct Exploitation

- Changes in land use
- Pollution
- Climate Change
- Invasive Alien Species

It is important that the new Environment Strategy puts in place measures to combat each of these drivers and that any actions are well funded in order to have a measurable impact.

Some specific areas where we call for action are:

- Completion **and** implementation of conservation action plans for all designated sites.
- Targeted interventions for priority species to reverse declines – through mechanisms such as Agri-environment topped up by specialist conservation programmes as required.
- Comprehensive management plans for whole NI coast, that incorporate measures to accommodate changing sea levels, flooding and erosion changes, biodiversity recovery above and below MHW, and public access.
- Complete designation of ecologically coherent network of MPAs.
- Completion and implementation of Management Plans and Measures for all MPAs.
- Alien invasive species management plans at the appropriate scale.
- Adoption of Site Nitrogen Actions Plans for all lands adjacent to our designated sites.
- An updated Fisheries Act that commits to ensuring that fishing does not exceed Maximum Sustainable Yield so our wild fish populations can recover.
- Investment in nature-based solutions to climate change mitigation and adaptation including a significant increase in native tree planting and peatland restoration.
- A new agri support scheme that that is outcomes-focussed, provides a real incentive for farmers to farm in a way that helps protect the environment and supports the objectives of the Strategy. Including moving more funds out of basic area payments and into the Environmental Farming Scheme (or its successor).). This will only be successfully achieved if next generation agri-environment schemes are more farmer-focused, carry less of a rigid administrative and prescriptive burden and clearly provide reward on an “outcomes achieved” basis.
- The adoption of ecological networks maps and the development and delivery of a ‘Nature Recovery Network’ across the Province. This is a NI-wide ecological network map for nature - a spatial plan that identifies and creates the corridors and areas of habitat wildlife needs to move in response to climate change. Nature Recovery Maps, properly integrated into and aligned with the Land Use Strategy referred to above, would inform future planning and environmental subsidies for farmers, turning nature’s recovery from an aspiration to a reality.
- Embed a ‘biodiversity net gain’ principle for housing and infrastructure developments – putting in place planning policies that make it mandatory for new developments to leave biodiversity in a better state than before.
- Development of a Land Use Strategy for Northern Ireland which enables landowners, individuals and communities to make the best use of our land and landscapes incorporating nature recovery maps.

Q8: What do you see as the main environmental governance priorities for Northern Ireland?

We consider the following to be the main environmental governance priorities for Northern Ireland:

- The Environment Strategy and associated targets and indicators must be legislatively underpinned. Urgent action is needed to reverse the continued evidenced decline of our environment. **This will require a legally binding strategy, complemented by SMART targets and indicators.**
- An environment strategy must have a **mandatory review and reporting period**, so that unintended negative consequences can be rectified and to allow the strategy to be adapted over time. Given the uncertainties presented by Brexit, a review structure for the Environment Strategy would allow for these uncertainties to be addressed as and when appropriate.
- **Existing national and international targets and indicators should be integrated** within the strategy (e.g. UN SDG 14, UK Marine Strategy etc.). However, they must be given a legislative basis so they do not go the way of previous environmental target failures.
- **The remit of the Office for Environmental Protection (OEP) should be extended to Northern Ireland.** We are deeply concerned about the risk of environmental governance in Northern Ireland being further weakened once we leave the EU and no longer have the oversight and enforcement of the EU institutions. Ideally, we would want to see a new governance body co-owned and co-designed by the four countries of the UK that would have jurisdiction in all four countries. Given the lack of alternative options for Northern Ireland, the only practical approach is for the OEP to be extended to cover Northern Ireland asap.
- **An independent Environmental Protection Agency (EPA) should be established in Northern Ireland to provide parity from a global perspective.** Whilst we agree with the statement that *'the focus should be on environmental outcomes rather than simply changing delivery structures'* – we do support the adoption of an independent Environmental Protection Agency for Northern Ireland. The most recent Report: Northern Ireland: Challenges and opportunities for post-Brexit environmental governance, concluded that the region is lagging behind the rest of the UK, experiencing 'the relegation of environmental concerns down the list of political imperatives'. The Report goes on 'Common issues include the lack of an independent environmental agency, the absence of an environmental audit committee in the NI Assembly, and the lack of a specific environmental tribunal or at least environmental experts within the judiciary and prosecution services.'

An independent regulator/EPA would monitor the implementation of environmental protections and targets. Given the current state of NI's environment, establishing an EPA would send a powerful message that NI will be taking environmental protection seriously.

- The Environment Strategy must:
 - Have full cross-departmental engagement and compliance. The establishment of a cross departmental ESNi working group would assist in ensuring effective communication and reporting of the strategy across all government departments.
 - Have clear lines of accountability. All government Departments and public bodies should be included in the design not just of the strategy but

the crucial actions that need to be clearly set out within it; and should have a pro-active duty to implement it and be held accountable for the impacts of decisions taken.

- Be independently monitored with clear mechanisms to hold government to account.
- Have statutory footing and binding targets that are clear, measurable and ambitious and in line with the UN Sustainable Development Goals.
- Effective environmental governance is essential for any framework of environmental policy; a strategy that is not backed up in law with effective enforcement mechanisms is essentially no more than a wish list.
- Be matched by appropriate and significant additional direct investment to enrich our environment and land/sea resource and a commitment that future public payments are directed towards delivering public benefits.

Q9: Do you agree that these are appropriate draft outcomes for the Environment Strategy?

Yes

No

If "No", what alternative or additional outcomes would you like to see?

We think that the outcomes stated are broadly appropriate however, they are vague in scope and lacking ambition or sense of urgency given the current climate and ecological crisis we are facing. They do not reflect the urgency and transformative change required. The Outcomes must be measurable and time-bound supported by legal targets and indicators developed to measure them. Also a mechanism for reviewing and reporting on them should be established.

We have included below some questions or concerns in relation to the proposed outcomes.

- We achieve zero waste and a well-developed circular economy; - but by when – and against what reference frame (legislative or economic or all underpinned by legislative drivers)?
- Everyone can access and is connected to a healthy environment; - how will this be measured? How will the health benefits be assessed.
- We have reduced greenhouse gas emissions and improved climate resilience; - to what level and by when – should have a target to be carbon neutral by at least 2040 if not earlier?
- Biodiversity loss halted, ecosystems in a healthy state, and well managed landscapes; - biodiversity loss should not only be halted but more importantly, reversed with clear plans developed and implemented by 2025 and wide-scale recovery of nature evidenced by 2030.
- We achieve sustainable consumption and production on land and sea; - how will this be measured, what are the indicators?
- We have excellent air, water, land and neighbourhood quality. – needs to have clear targets (eg what does excellent mean?) and timescales allocated.

Consideration should be given to linking into broader national / international outcomes and targets eg the UN Sustainable Development Goals.

Other Comments

We believe that the overall Environment Strategy for Northern Ireland should be time-limited rather than open-ended as is currently proposed by DAERA as this just gives the potential for targets to move and be delayed and could cause a lack of focus. We think a timescale of 20-30 years would be appropriate given the time some ecological recovery will take to be fully realised. However there must be regular reviews to ensure progress is being made against targets in at least 5 year cycles.

Q10: What are your big ideas for the future protection and enhancement of the environment?

Aside from the asks included in other section of this response, our 'BIG IDEA' for future protection of our environment is the development of a 'Nature Recovery Network' set in law. A Nature Recovery Network is a joined-up system of places important for wildlife. It is a spatial plan that identifies and creates the corridors and areas of habitat wildlife needs to move in response to climate change. It will connect wild places and bring wildlife into our lives. A legally-binding network for nature would mean that wildlife is prioritised when managing our land and planning our towns and villages. We know that in order to make enough space for nature to allow it to recover from huge losses over the past 50 years, we need to create more places for wildlife to live, over bigger areas, to manage these better and to join them up. Local Nature Recovery Maps would inform future planning and environmental subsidies for farmers, turning nature's recovery from an aspiration to a reality. Find out more here https://www.wildlifetrusts.org/sites/default/files/2018-06/Nature_recovery_network_final.pdf

As part of nature's recovery, we would also like to see the following included in the Environment Strategy:

- Farming subsidies should provide an incentive for farmers to farm in a way that helps protect the environment and support the objectives of the Strategy.
- Truly sustainable fisheries legislation and quotas to ensure recovery of our wild fish populations.
- Embed a 'biodiversity net gain' principle for housing and infrastructure developments – putting in place planning policies that make it mandatory for new developments to leave biodiversity in a better state than before.
- Take action on the climate crisis through a NI Climate Act – we need plans to accelerate the decarbonisation of our economy particularly by investing in nature-based solutions including a significant increase in native tree planting and peatland restoration.
- Include environmental awareness as part of the school's curriculum and provide funding to make it easier for schools to take pupils on regular trips to natural spaces.
- More effectively embed the natural environment as a key health and well-being tool to positively contribute to the mental health and general well-being of the public.

- NI needs an independent watchdog body to scrutinise government progress, and sufficient resources and funding to implement the plan fully.

Q11: Do you have any other comments or contributions?

We would reiterate the importance that the Environment Strategy is enshrined in legislation. Given our previous experience and NI's government's track record, we fear that without a statutory footing, the policies within the Strategy will not be strong enough to bring about the real change that is needed.

The island of Ireland represents a single biogeographic unit and the environment does not adhere to jurisdictional boundaries. Therefore, cross-border cooperation should be included within the strategy. Many of our environmental issues are cross border in nature and joint strategies will be required.

We would also reiterate the need for the Strategy to sit at the highest level and be an Executive-endorsed strategy implemented through cross-cutting departmental actions. This will be a key success factor moving forward.

Finally we would like to see improved engagement on environmental issues with key stakeholders and win:win solutions co-designed.