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Programme for Government Consultation

Ulster Wildlife welcomes the opportunity to provide input to the consultation on the next Programme for Government (PfG). Environmental outcomes will be fundamental to the development of a sustainable, competitive, resilient economy, achieving our net zero target for climate change, halting and reversing the loss of biodiversity and crucially protecting and enhancing the health and wellbeing of local communities. The environment is an intergenerational issue and collectively we have a duty of care towards future generations.

Given the importance of the environment as a cross cutting issue within PfG, it is evident that the environmental outcomes and associated indicators are not proportionate to the scale of the challenges to be addressed at NI level. Post Brexit, we are required to ensure non-regression in relation to the environmental laws contained within the Trade and Cooperation Agreement. As a region, we are also committed to delivering our contribution to local, regional and international environmental issues including UN global commitments on climate change and biodiversity.

We are supportive of the outcomes based approach adopted within PfG and we would like to see this process converted to a legislative basis similar to Scotland in due course. It is important to recognise that environmental change takes time and we would strongly suggest that outcomes and indicators reflect strategic priorities with indicators based on achievement by 2030 and interim targets used to benchmark progress. Ultimately, the PfG indicators should reflect targets within domestic legislation transposed from EU law and those within the Environmental Improvement Plan (EIP) currently under development. This will provide consistency of approach with progress evaluated by the Office of Environmental Protection

The points covered in this response are evidence and research based and a full list of references is available on request.

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The Wildlife Trusts 

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OUTCOME 1:

Our children and young people have the best start in life

Key Priority Area:

Access to education

Capability and Resilience

Care

Early Years

Skills and attainment

Outdoor learning (suggested addition)

Environmental well-being (suggested addition)

During the past 5 years, Ulster Wildlife in partnership with the YFCU, Duke of Edinburgh's Award, Keep NI Beautiful and NI Environment Link has delivered an extensive young people-led environmental action programme called the Grassroots Challenge. This initiative has been formally evaluated by QUB demonstrating very positive outcomes. Through discussion and activities, the young people involved have identified three key asks as listed below. We would suggest that outdoor learning is an additional key priority area for this outcome along with environmental well-being due to increasing levels of climate and ecological anxiety amongst young people.

Key Asks by Young People

1. More time learning in and about nature in school.
2. Assistance to secure 'green jobs'
3. A stronger youth voice on environmental issues & decisions in government

The role of environmental education

Outdoor learning fosters intellectual, emotional, social and physical development. By being outside and surrounded by nature, children and young people experience an ever-changing and free-flowing environment that stimulates all the senses. Nature provides countless opportunities for discovery, creativity, problem solving, and STEM education.

Interacting with natural environments enable children and young people to learn by doing, experiment with ideas and take positive action alleviating the feeling of helplessness in relation to climate anxiety and ecological grief. In nature, they also think, question, and make hypotheses — thereby developing inquisitive minds where they take risks, try and fail, and try again, gaining resilience and confidence.

Emotional & Physical benefits

In the outdoors, they are free to explore, move about, and make noise — all forms of self-expression that are often restricted indoors. Furthermore, nature enhances a sense of peace and mindfulness. Many studies have found that exposure to nature can reduce symptoms of ADHD and anxiety and contribute to improved mental resilience.

Environmental Benefits

In addition to the individual benefits gained by connection to nature, there is a collective benefit shared by all. Our children and young people are the next generation of stewards of the earth. In order to raise adults who are passionate about protecting the environment and preserving our planet, they must first develop a deep love for it.

The recent Dasgupta Review recommended that education systems should introduce nature studies from the earliest stages of our lives, and revisit them in the years spent in secondary and tertiary education. In order to have the maximum impact, this environmental education should be integrated with early years education. The economic benefits of investment in early years has been highlighted by Professor James Heckman Nobel Laureate in Economics, who found that the most economically efficient time to develop skills and social abilities is in the very early years when developmental support is most influential.

OUTCOME 2

We live and work sustainably – protecting the environment

We would suggest that this outcome is refined as follows:

We live and work sustainably – valuing, protecting and enhancing our natural and historic environment.

Indicators for consideration

Achievement of legislative and Environmental Improvement Plan targets by 2030 or earlier

30% of land and sea protected and managed for nature by 2030 (based on UN scientific recommendation)

This is a fundamental Outcome, upon which a range of the draft PfG Outcomes depend, and as such, it needs the necessary focus and resourcing to reflect this. Our local economy depends on a healthy, thriving natural environment (agriculture, fishing, aquaculture, tourism and recreation industries, to name a few). The environment is also essential for human health and well-being; attracting inward investment; and ensuring that NI can compete within an international market place with confidence, underpinned by a tangible, credible evidence base demonstrating sound environmental ethics. This will help to differentiate NI goods and services globally.

However, Northern Ireland remains 10-15 years behind other parts of the UK and Ireland on a range of environmental issues and a step change is required to accelerate progress. We are facing dual biodiversity and climate crises, with the natural environment under unprecedented pressure from human activities and the consequences of climate change.

This is the UN Decade on Ecosystem Restoration which focusses on preventing, halting and reversing the degradation of ecosystems worldwide in recognition of the current critical state of the natural systems upon which life depends. We have a responsibility to future generations to ensure protection and restoration of the natural environment, alongside taking action to mitigate climate change. Ulster Wildlife would therefore like to see meaningful ambition, leadership and action under this Outcome, effectively integrating environmental considerations across all policy areas of government.

Northern Ireland needs to make significant progress to ensure its current protected areas networks are effectively managed and biological features are brought into, or maintained in favourable conservation status. Currently 45% of Northern Ireland's Areas of Special Scientific Interest's biological features are in unfavourable condition, although the total terrestrial protected

sites (ASSIs, SACs, SPAs and Ramsar sites) increased from 1,384km² in 2009/10 to 1,494km² in 2019/20. Only 4.6% of Northern Ireland's Marine Protected Areas are under favourable management, however, there has been a major effort made in designations of marine protected sites, with the total area protected increasing from 269km² in 2009/10 to 2,566km² in 2019/20. We recognise that implementation of management measures is the next stage in the designation cycle, and emphasise the need for full commitment and resourcing to this priority, including implementation of an adaptive management cycle with adequate monitoring, and wider stakeholder engagement to demonstrate the benefits of biodiversity protection.

Wider protection of the environment beyond designated/protected sites is crucial if we are to halt and reverse the loss of biodiversity and to meet national and international targets for biodiversity and carbon sequestration. This will require a change in approach, proactive measures to encourage appropriate habitat management and recreation and inclusion of Nature Recovery Networks, whereby space for nature is embedded in the management of our land and sea, farming, fisheries and planning systems, joining up habitats and enabling biodiversity recovery. This will necessitate environmental improvement plans at a national scale, supported by regional and local biodiversity strategies with binding targets and regular, transparent reporting mechanisms. A biodiversity net gain approach in the planning system would also be pivotal in reversing biodiversity decline.

There is also a great opportunity to enable the natural environment to help the UK reach its net zero greenhouse gas emissions target through sequestering carbon, and provide climate change resilience- for example natural flood solutions, peatland restoration, disease resistance and pollination services. Making effective use of 'Nature-based solutions' must be embedded within protection of the environment, across all sectors. It is crucial that Nature-based solutions are given prominent consideration in both the terrestrial, coastal and marine environments underpinning various strategies relating to land use and marine spatial planning, as well as being reflected in how we manage existing designated/protected sites.

Q2. Do you agree with the Key Priority Areas (listed below) that have been included under this Outcome?

The Key Priority Areas under this Outcome are:

- Natural Environment
- Green Economy/**Green recovery**
- Built Environment
- Housing
- Active and Sustainable Transport
- Waste Management
- Water and Wastewater Management

Yes

No

If yes, please add any further details below:

We would suggest that Green Economy should explicitly embrace the '**Green Recovery**' ambition post Covid-19, and that this is included within the Key Priority Areas. A Green

Economy embraces and utilises Nature-based solutions to climate change, and focussed habitat management and restoration, including development of a land use strategy, further support for long-term environmental farming schemes and incorporation of environmental net gain principles in planning.

The Built Environment priority area should incorporate green and blue-green infrastructure to promote climate change resilience, e.g. flood protection and improving water quality, as well as making space for nature by promoting greenways and wildlife-friendly green spaces. Urban green spaces can make a vital difference to enabling nature to adapt to climate change and provide reservoirs of biodiversity, as well as contributing to clean air strategies and providing enjoyable areas to enhance well-being.

The Housing priority area should ensure that new builds have good access to high quality green spaces, both for well-being and to provide space for nature to adapt to climate change and to help address the current biodiversity crisis.

A number of strategies are listed within the draft PfG Outcomes paper, and although we recognise this is not an exhaustive list we would like to ensure that the Environmental Improvement Plan and Peatlands Strategy are added when finalised during 21-22 financial year.

Q3. Do you feel there are Key Priority Areas missing under this Outcome?

Yes

No

If yes, please add any further details below:

We would ask that a ‘Green Recovery’ key priority area is included, in recognition of the opportunity post Covid-19 to embed climate and biodiversity across policy areas and facilitate the natural environment to address many of the global challenges of our times. This would also recognise the key role access to nature has had in promoting well-being throughout the pandemic, and the value to increased connectedness to nature.

The Environmental Audit Committee’s ‘Grow Back Better’ report succinctly states that “*If the economic recovery from covid-19 is not used as an opportunity to ‘grow back better’, then climate change and biodiversity collapse may deliver an even greater crisis. There will be no vaccine against runaway climate change*”. Furthermore, a radical change in approach to measuring economic growth is needed to ensure that economic growth is within the limits of a resilient, healthy natural environment – a ‘nature positive economy’.

4. Do you feel there are Key Priority Areas included under this Outcome that are not relevant?

Yes

No

At present, the outcome under the natural environment measure is confined to designated sites and does not address the wider environmental issues. We would suggest that the targets under this section reflect those transposed to domestic legislation from EU law and as agreed in the Environmental Improvement Plan when finalised. This will cover areas such as water quality

(rivers, lakes, water bodies), air quality, biodiversity, land use, climate change, waste etc with specific measurable indicators.

It is important to recognise that environmental change takes time and as such, the indicators should be long-term targets. We would suggest that indicators underpinning this outcome, includes the UK commitment to **protect & positively manage 30% of land and sea for nature by 2030** as recommended by UN scientific experts. This would encompass designated sites, MPAs, nature reserves, nature recovery networks, agri-environment schemes and nature based solutions for climate. If progress is to accelerate for climate change through land use and land use change and the loss of biodiversity halted and reversed, long-term policies will be required to support landowners in this transition.

OUTCOME 3

We all enjoy long, healthy, active lives

The Key priority areas under this outcome are:

Access to Health,
Inclusion and Tackling Disadvantage,
Mental Health and Wellbeing,
Older People,
Physical Health and Wellbeing
Natural environment

The natural world provides us with everything we need to survive - food, water, clean air, energy and shelter. It is the foundation of our very existence and 2020 has proved to be something of a wake-up call as people have increasingly sought solace in nature from the Covid 19 pandemic. Research increasingly demonstrates that spending time in natural spaces can reduce stress, improve sleep, and reduce the symptoms of disorders such as anxiety and depression. Exposure to the natural world helps humans live happier, healthier lives.

The beneficial relationship between human health and the environment was illustrated by the EU's PHENOTYPE study that found that positive health effects of green space have been observed on a range of issues including but not limited to: longevity cardiovascular diseases, people's self-reported general health, mental health, sleep patterns and recovery from illness.

Similarly, a 2016 WHO report summarizing evidence on the health effects of green space in urban areas showed that green spaces offer numerous public health benefits, including psychological relaxation and stress reduction, enhanced physical activity and a potential reduction in exposure to, among other harmful urban factors, air pollution, noise and excessive heat. The report concludes that there is a need for both small, local green spaces situated very close to where people live and spend their day, and large green spaces that provide formal recreational facilities and opportunities to interact with nature.

Within NI, the Youth Wellbeing Survey, 2020, commissioned by the Health and Social Care Board, has shown that 'rates of anxiety and depression are around 25% higher in the child and youth population in comparison to other UK nations. This reflects a similar trend in the adult population in Northern Ireland.'

We would therefore suggest that the Natural environment for health and well-being is an addition to the key priority areas included within this outcome in recognition of its role in the prevention of illness, condition management, mental and physical health.

OUTCOME: 6

Our economy is globally competitive, regionally balanced, and carbon-neutral

1. Do you feel this Outcome is worth including in the Programme for Government framework?

Yes

No

I don't know

We would suggest that this outcome is refined as below:

Our economy is globally competitive, regionally balanced, environmentally sustainable and carbon-neutral

The concept of Green Growth is an important step forwards for NI, however it is important that Green growth is not used as a replacement for sustainable development. It provides a practical and flexible approach for achieving concrete, measurable progress across its economic and environmental pillars, while taking full account of the social consequences of greening the growth dynamic of economies. The focus of green growth strategies is ensuring that natural assets can deliver their full economic potential on a sustainable basis. That potential includes the provision of critical life support services – clean air and water, and the resilient biodiversity needed to support food production and human health. Natural assets are not infinitely substitutable and green growth policies must take account of this and remain within environmental limits.

A commitment to a sustainable economy that benefits all citizens is an essential Outcome, however Ulster Wildlife would like to ensure that the opportunity to reconsider what is meant by a 'sustainable economy' and 'economic growth' is embraced during our recovery from the Covid-19 pandemic. In particular, the findings of the UK Government's Dasgupta review¹ should be applied, and efforts made to embed a 'nature positive economy' as a key Outcome. This not only addresses efforts to reach carbon neutrality (i.e. net zero greenhouse gas emissions targets) in response to the Climate Emergency, but also, crucially, emphasises the need for our economy to work within environmental limits and to ensure, above all else, that the environment is enabled to provide the ecosystem services upon which we depend. The need for healthy and resilient ecosystems is vital to longer-term prosperity and in responding to the threats of climate change (e.g. flood risk mitigation, air quality and water quality). It is essential that in enabling carbon neutrality, government strategies do not compromise the preservation and restoration of biodiversity – the biodiversity crisis severely affects the ability of ecosystems to be resilient and to provide the services many of our industries depend upon (for example farming, fishing, aquaculture, forestry).

¹ <https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>

2. Do you agree with the Key Priority Areas (listed below) that have been included under this Outcome?

Yes

No

The Key Priority Areas under this Outcome are:

- Competing Globally
- Green Economy
- **Green Growth/Green recovery**
- Food, Farming and Fishing
- Infrastructure
- Innovation

Both the Green Economy and Green Growth key priority areas must recognise the need to work with the natural environment, and to stay within environment limits, with equal consideration given to maintaining and restoring biodiversity as to achieving carbon neutrality. Recognition of the vital ecosystem services industries depend upon must be embedded in all policy areas, particularly in adapting to climate change and the significant risk this poses for many industries- especially agriculture and fisheries. By placing protection and restoration of the natural environment at the forefront of policies, this will enable a level of climate change resilience through nature-based solutions, and economic growth should not compromise these but work using a complimentary approach. This is also very important for human health and well-being.

3. Do you feel there are Key Priority Areas missing under this Outcome?

Yes

No

A 'Green Recovery' key priority area should be included recognising the challenges and opportunities post Covid-19 and making strong links between the "We live and work sustainably - protecting our environment" Outcome and the "Our economy is globally competitive, regionally balanced and carbon-neutral" Outcome, and ensuring that these Outcomes are not siloed between government departments.

Green recovery strategies from the Covid-19 Pandemic have featured highly in international discussions and if NI wants to keep pace with global competitors, it is important that we 'build back better'. Significant interest exists amongst companies keen to play their part within the climate and biodiversity crises and financial provision to support this transition would help accelerate progress, building capacity within the private sector and helping local businesses prepare to compete in an international market place with genuine environmental ethics.

We would suggest that sustainable ecotourism is considered under this outcome especially with the potential for growth to the NI economy given our natural heritage assets. Countries such as Iceland, Norway, Finland, and Scotland are leaders in this field with effective protection, enhancement and management of natural capital assets. For example, the **value to Scotland's** economy (the direct economic impact) of nature-based tourism is £1.4 billion per year accounting for 39,000 jobs (full-time equivalent). Tourist spending on nature-

based activities is worth nearly 40% of all tourism spending in Scotland. With a carefully planned strategic approach natural heritage tourism could add significant value to the NI economy.

4. Do you feel there are Key Priority Areas included under this Outcome that are not relevant?

- Yes
 No

Conclusion & Summary

In conclusion, the key points summarised in this consultation response are listed below and we look forward to seeing the next iteration which we hope will place greater prominence and priority on environmental outcomes as a cross cutting issue within PfG.

Outcome 1

- Include environmental well-being and outdoor learning in the key priority areas

Outcome 2

- Refine outcome 2 as below:
We live and work sustainably – valuing, protecting and enhancing our natural and built environment.
- **Indicators**
- Consider use of the PM's commitment to the United Nations as an indicator which is science based in terms of nature recovery strategies:
30% of NI's land and sea is positively managed for nature which would include designated sites, MPAs, agri-environment schemes, underpinned by Nature Recovery Networks and Net Gain for planning. This does not need to be exclusively for nature but effectively integrate environmental outcomes and deliverables.
- **Achievement of legislative and Environmental Improvement Plan targets by 2030**
- Integration of Nature-based solutions to climate change, across land and sea, with binding targets to safeguard ecosystems that capture and store carbon and promote restoration and recreation of habitats that enhance carbon capture while also providing wider ecosystem services such as flood protection and promotion of water- and air- quality.

Outcome 3

- **Consider the addition of the natural environment for health and wellbeing as a key priority area**

Outcome 6

Refine Outcome 6: Our economy is globally competitive, regionally balanced, environmentally sustainable and carbon-neutral

- Inclusion of green recovery as a key priority area in addition to Green Economy and Green Growth given its role in climate and ecosystem services
- Inclusion of sustainable tourism as a key priority area

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