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Ulster Wildlife Response to the draft Environment Strategy 2022

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Introduction (these could also be considered as 'General Comments' – adding to those detailed under Question 8)

Ulster Wildlife is Northern Ireland's largest local nature conservation charity with over 14,000 members. Our vision is for a healthy, well-cared for natural environment which contributes to enjoyment, quality of life, prosperity, health and well-being.

Ulster Wildlife welcomes the draft Environment Strategy and its breadth of aspirations, including the recognition of the crucial role the environment plays for all sectors and the need for concerted action. We understand that the Environment Strategy, as an Executive level strategy, will be complemented by a suite of daughter strategies that will furnish further detail in terms of specific targets and actions, and that the Environment Strategy will act as a 'framework strategy' and also be subject to updates as a 'living document'. Following commencement of the new UK Environment Act (2021) in Northern Ireland, expected this year, the Environment Strategy (or at least part of it) will legally become our Environmental Improvement Plan (EIP), subject to scrutiny by the Office for Environmental Protection with clear reporting structures. There are significant differences between a strategy and the Environmental Improvement Plan and this will need to be considered and further developed moving forward. The EIP must "significantly improve the natural environment in the period to which the plan relates". This marks a much-needed step change which we wholeheartedly welcome - and is vital for recovery, restoration and preservation of our natural environment and all it does for human society.

In this response, we have taken the liberty of using the Word template kindly provided by the DAERA Environment Strategy team which doesn't have the word limits imposed by the Citizen Space portal. We feel that the word limits are very restrictive when commenting on such a complex strategy and we are concerned by this in terms of how this may limit effective engagement and feedback.

As a document, we have some issues with the level of detail and the structure under each of the Strategic Environmental Outcomes (SEOs). We believe that the vision presented under each subsection must represent the end goals or mission, whilst objectives are set for accomplishment of the goals. It is crucial that a clear link is made between the current position as reported and the ultimate vision, with the



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pathway to achieve the vision set out as targets with links made to daughter strategies. There are varying levels of information provided in each of these sections, leading to an inconsistent structure in the document. Crucially, linkages and interactions between SEOs, future visions/outcomes, actions and targets are not addressed. The strategy requires an in-depth analysis of how SEOs relate to each other- some may actually be in direct conflict - and a framework is needed to prioritise and structure these.

Fundamentally, **we call on the Strategy to be much more ambitious** – nature is not ‘threatened’, it has already suffered serious damage, and we are in a twin biodiversity and climate crisis that is impacting on all our lives. This is noted in the Strategy’s introductory sections, however the urgency and seriousness of the situation and the transformational change needed to address this is not reflected by the future visions, outcomes, actions and targets under each of the SEOs. Many of the actions detailed by the Strategy are ‘recycled’ from existing targets under former EU legislation or other government policies, and are less ambitious than those in bordering nations – they do not provide the stretch needed for a step-change in approach to managing- and, crucially, restoring- our natural environment. Worse still, some outcomes/targets fail to match existing targets and/or obligations and/or commitments. For example, on page 24 of the strategy is a target which says “By 2027: 70% of waterbodies at Good Status”. NI has already twice failed to meet Water Framework Directive (WFD) targets and this wording means that NI will once again fail to meet the revised WFD target of full compliance (100% GES) by 2027. The Environment Strategy needs to integrate with other relevant strategies to ensure compliance with existing commitments. With recent reports covering the impact of NIW discharges of 7m tonnes of raw sewage per year into watercourses and coastal waters and the time lag between chemical and biological indicators, we accept that the 100% target will not be achieved by 2027 however, we feel the original vision should remain as it is time to accelerate progress.

As the framework strategy, the tone must be appropriate to the crisis we are in – it is not appropriate to overly refer to daughter strategies especially where many of these are in early draft stages and not yet available for scrutiny. There is no reassurance that meaningful change will be effected without strong targets and truly ambitious vision. As the strategy is a living document they can be added when fit for purpose in terms of meaningfully advancing the roadmap to the vision however, it is important that they do not hold up progress in the interim period.

There is a lack of long-term thinking within the draft Environment Strategy, and as this is the first iteration, it is vital that we begin with the end goal in mind. A good strategy provides a clear road map, laying out how resources should be allocated to accomplish the Future Vision/Outcome. It balances long-term and shorter-term targets. The draft Environment Strategy is unbalanced as it does not include targets beyond 2025 for many SEOs, which is not acceptable- being more like an action plan. We welcome the flexibility of the Strategy being a ‘living document’ that is reviewed every five years, as long as the revisions are in support of the overall Future Vision/Outcomes, however, it is unclear:

1. Who will review the strategy?
2. How the review will assess progress and/or environmental improvement
3. How the Government will be held accountable if targets are missed

Long-term thinking is core to this Strategy, or it is doomed to an endless cycle of short-term ‘reviews’ in which the targets become a list of current areas of work and non-committal plans. Given the importance of environmental issues it is crucial that it provides a clear direction of travel that will span multiple political mandates.

Resourcing the delivery of the Environment Strategy at an appropriate level is crucial – many of the actions and targets require significant cross-departmental support, such as infrastructure development, and rely upon considerable data collection and ongoing scientific monitoring. Daughter strategies (Departmental strategies and programmes, such as Future Agricultural Policy Framework, Future Landscape Strategy, Clean Air Strategy, Peatlands Strategy, Marine Protected Area strategy) will require a step change in

approach and funding in order to deliver and maintain outcomes. We would welcome further detail on resourcing commitments under the Environment Strategy. The recent Independent Fiscal Commission NI showed that Northern Ireland spends less per head on average on environmental protection than in the UK – it is vital that financial resourcing is reflective of the biodiversity and climate crises we face to effectively accelerate progress.

The Environment Act (2021) will require reporting against targets set in the EIP and as such targets need to be clear and ideally SMART (specific, measurable, achievable, realistic and time-bound). Many of the actions and targets detailed under the SEOs use language which is vague and only a small proportion of the actions and targets have timeframes assigned to them – furthermore departmental and other responsibilities are not identified, which we believe is crucial for transparency and to indicate the required level of commitment. We recognise further targets may be provided by daughter strategies, but we would strongly encourage the use of ‘apex targets’ which can be measured and are time-bound, under which other targets can provide more detail within the daughter strategies.

In recognition of the core objective of the Environment Strategy – to **significantly improve** the environment- it is essential that non-regression principles are embedded. Furthermore, we would call for legislation to **make targets legally-binding**.

As an Executive level strategy, we understand that the Environment Strategy sits at the same level as the Green Growth strategy. It is unclear from the consultation document how these two strategies will interact, other than both feeding into the DAERA 30 Year Plan, however it is crucial that both strategies are considered together and that objectives of one do not conflict with the other. This is the same for the Energy Strategy, which is also an Executive level strategy. Responding appropriately to the dual climate and biodiversity crisis requires strong oversight and ethics to resolve potential policy conflicts, and it is not clear from any of these three strategies how this will be addressed in Northern Ireland, and how cross-departmental working will be enabled.

At an Environment Strategy level, **climate change has not been integrated across all SEOs**, which is disappointing as this will impinge on every action detailed and needs to be fully accounted for. For all SEOs, the ‘current status’ section should include relevant climate change pressures - identifying factors contributing to vulnerability in relevant systems (sensitivity and exposure to climate signals resulting in potential impacts as well as adaptive capacity) is the first step in prioritising where action is needed. This will force the strategy to be more forward looking (few of the targets go beyond 2025), and subsequently will require the development of targets and actions to address SEOs under a climatic regime subject to changes, many of which are currently unforeseen and may develop rapidly.

The issue of diffuse pollution, ammonia and methane emissions are not adequately addressed in terms of their huge impact both on biodiversity and in climate change mitigation. Targets advised by the UK’s Climate Change Committee (CCC) for methane under the ‘Balanced pathway to UK net zero by 2050’ of a 42% reduction in methane emissions in NI during the period 2020-2050 are not included. We urge consideration of such targets and inclusion of ambitious and appropriate targets within the Environment Strategy itself rather than departmental strategies.

We would like to emphasise the need for concerted and urgent action around planning – at a minimum to actively enforce planning conditions that are made with the objective of protecting nature or preserving biodiversity. This affects the delivery of many of the wider actions and visions under the SEOs and needs embedding across these.

Q1a: Do you agree with Strategic Environmental Outcome (SEO) 1: ‘Excellent air, water, land & neighbourhood quality’?

Yes.

Q1b: Are you content with SEO 1 tables (1 to 6)?

No.

As with many of the SEO tables, reference is made to other strategies within the proposed actions and targets, which makes it difficult to assess all possible targets. The language used in many of the vision and outcomes is not clear or ambitious enough, with aspirations such as ‘cleaner air’ and ‘improved monitoring network’ unable to provide sufficiently robust improvement end objectives.

There are fundamental links between freshwater management, land management (catchment management) and coastal water quality that are not addressed by the strategy as these are examined in separate tables – this needs addressed to provide integrated and comprehensive targets that drive meaningful improvement. Furthermore, catchment management requires cross-border approaches that must be embedded in the Strategy.

Specific points are provided below in relation to areas within Ulster Wildlife’s expertise:

Table 2: Water Resources: Quality & Quantity

There is a lack of timeframes assigned to the targets.

‘2022: Publish final RBMP’. To ‘publish’ a document will not achieve improvement in water quality or quantity – the plan needs to be resourced, implemented, progress monitored and plan reviewed which should be reflected in the wording of this target.

‘By 2027: 70% of waterbodies at Good Status’ is unacceptable, especially given the status of waterbodies have been deteriorating since 2015. The decline in the 52 water bodies achieving good status since 2015 is a clear indication that existing measures are not adequate to address the significant water management issues in NI. The UK Water Framework Regulation required that **Good Ecological Status is achieved in 100% of waters by 2027**, and under all conditions it requires that there should be no deterioration in status. The strategy target needs to reflect this target.

It is not clear from the information provided with the strategy document how some of the targets relate to the future vision and outcomes, e.g. PC21 and ‘Implement the Living with Water in Belfast Plan’. ‘Integrated ecosystem models; Lough Foyle; Carlingford Lough & Belfast Lough’ is vague and as currently stated, not actionable. It is also unclear why only a subset of sea loughs are mentioned.

Climate change impacts are not included in the Current Status even though it is vital to identify the relevance of climate change to water quality and quantity to help this SEO become more resilient to climate change or more supportive of adaptation by understanding the relevant climate change risks and opportunities. As a signatory to the OSPAR (Oslo and Paris Conventions) Commission, the UK is already committed to ensuring “*nutrient reduction targets and measures are sufficient to avoid adverse eutrophication effects in a changing climate*”¹ and the strategy should reflect this.

Table 3: Marine and Coastal Water Resources: Quantity and Quality

We are encouraged by the inclusion of climate change pressures in the current status section and we welcome the ‘*establishment of an ocean acidification monitoring programme*’, however this urgent target

¹ [documents \(ospar.org\)](https://documents.ospar.org/)

is not time-bound in the draft strategy. Understanding how ocean acidification will affect marine life and the jobs and communities that depend on it is critical to a healthy ocean and blue economy.

Targets and actions need to include plans to maximise the opportunity to deliver benefits for nature and climate, as well as water quality, i.e., nature-based solutions, for example, kelp may locally reduce acidification protecting shellfish² as well as other multi-benefit outcomes for nature, people and climate. As a signatory to the OSPAR Commission, the UK is already committed to '*applying nature-based solutions to reinstate and safeguard the natural capacity of the ecosystem to sequester nutrients through conservation and restoration of estuarine, coastal and marine habitats by 2030*'³.

'Achieve Good Environmental Status (GES) in our seas' is welcome but **a more ambitious suite of measures is needed to reverse the continued failure of many MSUK descriptors**. NIMTF suggestions on additional (NI specific) MSUK measures needed can be found here: https://nimtf.files.wordpress.com/2021/11/nimtf-response-to-msuk-part-3-programme-of-measures_submitted.pdf

NI has consistently failed to meet GES (UK Marine Strategy) for marine litter and noise. The '*development and implementation of a NI Plastics Strategy and the revision and implementation of the DAERA Marine Litter Strategy*' are encouraging, but again not time-bound. As a signatory to the OSPAR Commission, the UK is already committed to eight time-bound specific objectives to be achieved by 2027 that aim to prevent inputs of and significantly reduce marine litter, including micro plastics, and this should be reflected in the strategy.

'Collaboration with UK administrations to manage noise' is a vague and weak target. The strategy must commit to reducing anthropogenic underwater noise to levels that do not adversely affect the marine environment, and adhere to OSPAR objectives of:

1. *Implementing a monitoring and modelling programme for continuous sound to support an assessment of anthropogenic underwater noise by 2022, and,*
2. *Implementing an action plan setting out a series of actions and measure to reduce noise pollution by 2025.*

'Integrate post 2020 international targets relating to clean seas & climate change into DAERA strategies' is welcome. The huge potential for our seas to help mitigate and adapt to the impact of climate change must be fully recognised and pursued through active restoration of and robust protection for blue carbon habitats and species. The addition of a '**Northern Ireland Blue Carbon Action Plan**' would inform how Northern Ireland could help contribute to international targets on the ground and greatly increase the potential for NI seas to help mitigate and adapt to the ever-increasing negative impacts of climate change.

Maintenance of high quality coastal waters is of prime importance to maintaining access to shellfish that are safe to eat. Contamination of shellfish waters with pathogenic bacteria and viruses leads to significant economic costs, such as those associated with shellfish production and marketing, health care, degradation of ecosystem services, and increased water treatment processes. Given that coastal water quality and mariculture viability are heavily dependent upon land use and land management in surrounding catchments, an evaluation of possible changes in water quality conditions based on climate change risks, and key policy drivers (e.g. tree-planting targets) should be considered to inform future aquaculture in Northern Ireland. Concerted action is needed to address poor water quality of often diffuse terrestrial origin impacting coastal ecosystems, with investment in infrastructure, improved monitoring and land management/agricultural practices through advanced catchment management systems, as well as strong action to prevent and respond to pollution incidents that affect freshwater and ultimately- coastal systems.

Q2a: Do you agree with Strategic Environmental Outcome (SEO) 2: 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'?

Yes.

Q2b: Are you content with SEO 2 tables (7 to 12)?

No.

We emphasise the Areas of Outstanding Natural Beauty (AONBs) are currently not fit for purpose to protect nature, as there is no legally enforceable protection afforded by these types of designation to habitats or species. We understand that the concept of regional asset status is being considered for the Mourne and this approach should be extended to other key areas of NI given the resistance to national parks which would also have a very beneficial impact on tourism. It is imperative that government/local authority planning departments align with this strategy. We live in a beautiful country and collectively we have caused significant degradation of many of our natural heritage assets. With the twin climate and ecological emergencies fundamental change is required.

There is the opportunity to ensure SEOs support each other, such as implementation of Nature Recovery Networks (SEO3) in part through Greenways and use of Greenways for green infrastructure as a climate change action. Greenways and green spaces provide opportunities to make our landscape more permeable for wildlife and promote climate change adaptation.

Table 10: The Next Generation

We welcome the consultation with young people that has taken place regarding the proposed Environment Strategy. For this to be seen as **genuine participation** by the next generation there is a very real need to involve young people in the next stage of the process which is the monitoring and evaluation of progress against targets set out across the whole Environment Strategy, not limited to SEO 2. Ongoing co-development of the final strategy and the Environmental Improvement Plan is vital, as well as young people's physical presence on the committees that hold the Executive to account for delivery of the strategy would ensure a tangible sense of urgency and seriousness to the proceedings. For they will live with consequences of the strategies successful or unsuccessful delivery longer than anyone else.

There is a rich and diverse range of Education for Sustainable Development programmes underway across Northern Ireland delivered by an equally rich and diverse range of organisations and partnerships. We believe the Environment Strategy's desired actions and targets should be expanded to encompass this rich diversity of provision.

We would advocate for the inclusion of a much more ambitious target regarding outdoor learning – i.e. that every school pupil should spend an average of an hour a day engaged in outdoor learning. This recommendation and request comes from consultation with young people from across the UK carried out through the Our Bright Future initiative 2018/19.

Table 12: Historic Environment

Historic sites may also be significant for biodiversity - a role which is often unrecognised - and it is essential that this role is also recognised and safeguarded, and where possible, supported through ongoing sensitive management.

Q3a: Do you agree with Strategic Environmental Outcome (SEO) 3: 'Thriving, resilient & connected nature and wildlife'?

Yes.

Q3b: Are you content with SEO 3 tables (13 to 15)?

No.

Table 13: Protecting Nature on Land

An associated hierarchy of priority is needed for the actions and targets, for example the cross-cutting, fundamental importance of action for ammonia, and impacts of inappropriate agricultural management systems. The table makes it appear that only woodland cover, peatlands and light pollution are real priorities, which would not be reflective of the issues facing restoration and protection of nature on land. There is not a balance between the vision and the actions/targets detailed to achieve the vision.

The level of ambition is too low, with independent scientific advice and recommendations not adhered to, for instance in the case of increase in woodland cover: According to the Northern Ireland woodland register, NI woodland cover in 2020 was 8.7% (118,381 hectares). A target of 8.8% woodland cover by 2030 would equate to approximately 450 hectares per year over the next eight years. We have serious concerns about this target as it lacks any ambition and undermines a number of existing targets, such as those required by the NI Forestry Strategy, Forests for Our Future and CCC recommendations. The 2006 NI Forestry Strategy set an ambition to double the area of woodland in Northern Ireland from 86,000 hectares (6%) in 50 years – this equates to 172,000 hectares (12%) by 2056. Meeting this ambition will require an additional 53,619 hectares of woodland - approximately 1,490 hectares per year, every year from 2020 to 2056. It should be noted that this 12% target is also quoted in some sources as a target for 2050 not 2056 – this only increases the rate of woodland creation to 1,787 hectares per year. In 2020, the DAERA Forests for Our Future programme set an ambition to plant 9,000 hectares of new woodland by 2030, this equates to approximately 900 hectares per year. The Balanced Net Zero Pathway set out in the CCC's 6th Carbon Budget recommends that Northern Ireland reaches a reduction in greenhouse gases of at least 82% by 2050. The CCC Balanced Pathway for Northern Ireland includes a net increase from new forest plantings of over 2,000 hectares each year to 2050. This target is quoted on page 54 of the DAERA Consultation on Future Agriculture Policy Proposals for Northern Ireland.

The Strategy has very little focus on species action: established ecological theory has highlighted the role of certain species as ecosystem engineers, and there are known cascade effects from the introduction and establishment of invasive species or imbalance between predators and prey for example. Species interactions are complex and highly modified by habitat, and these interactions are now subject to differing pressures as a result of ongoing climate change. A habitat-only focus may act to the detriment of some priority species without wider understanding and recognition of interspecies relationships and how this changes by habitat and under climate change – we would like to ensure priority species action is fully recognised by the Strategy rather than delegated solely to the daughter Biodiversity Strategy.

We would seek clarification on the principles of 'biodiversity gain' and how this will be implemented, recognising some of the shortcomings of Biodiversity Net Gain as implemented in the planning system in England, and the wider considerations recommended for 'Environmental Net Gain'.

The Nature Recovery Network approach, which is recognised as fundamental in the Nature Positive by 2030 report, is crucial to the restoration of nature and its wider ecosystem services and we welcome its inclusion.

In relation to the peatlands target of '*All semi natural peatlands are conserved or restored to healthy, functioning ecosystems by 2040*', this is reliant on the subordinate Peatlands Strategy (draft of which was

consulted on in 2021) to deliver this target. It is essential that nature-based solutions to climate change-peatland restoration, tree planting, soil management and blue carbon to mention just a few- are fully embedded within the Environment Strategy to ensure full delivery governance and provide assurance of the commitment to such solutions.

Table 14: Protecting Nature at Sea

'By 2030: 30% of seas protected, ensuring an ecologically coherent & well managed MPA network', 'Develop and implement effective MPA management and restoration plans' and 'Develop and implement post-2020 MPA Strategy' are welcome inclusions in the strategy. We look forward to engagement with DAERA in early 2022 regarding the development of the post-2020 MPA Strategy for Northern Ireland.

While the drafting of management plans for NI inshore MPAs is also well underway, the condition status of our MPAs and features is not publicly available or readily accessible. The timeframe for publication of site condition assessments needs to be included as a target.

The need for effective restoration plans and tools capable of promoting large-scale recovery of coastal and marine ecosystems in the face of intensifying climatic stress has never been greater. Across the UK and Europe, **active restoration of habitats and species** including seagrass, native oyster beds, saltmarsh, and thornback rays is underway. Northern Ireland is the only part of the UK without any active restoration programmes. It is vital that Northern Ireland starts moving forward to bring our marine habitats and species in to recovery and an appropriate SMART target is included in the strategy to reflect this intention.

We are encouraged by the inclusion of climate change pressures in the current status section and we welcome the targets *'Develop and implement marine invasive species action plans'* and *'Extend and adapt the MPA network to develop climate resilience and increase protection of carbon storage habitats'*. It is vital that our MPA network is 'climate-smart', where the planning and management takes accounts for the risks of species range shifts, acidification, invasive species etc.

We look forward to engaging and contributing to the development of *'specific measures to protect and enhance relevant carbon sequestration and storage habitats'*. We strongly suggest the development of a **Blue Carbon Action Plan for NI** that will help identify measures that can be implemented before 2030 using methodologies proven in other parts of the UK. UW's recommended Blue Carbon Action Plan can be found here: <https://www.ulsterwildlife.org/news/northern-irelands-marine-habitats-could-help-transform-climate-crisis-says-new-report>.

'Achieve Good Environmental Status in our seas' is welcome but **a more ambitious suite of measures is needed to reverse the continued failure of many MSUK descriptors**. NIMTF suggestions on additional (NI specific) MSUK measures needed can be found here: https://nimtf.files.wordpress.com/2021/11/nimtf-response-to-msuk-part-3-programme-of-measures_submitted.pdf

We welcome the inclusion of a *'Seabird Conservation Strategy for NI'* action; however, a notable omission is the development of an **Elasmobranch Strategy for NI** which we strongly recommend including. This will also address objective 5.6 of the OSPAR Strategy for the Protection of the Marine Environment.

Likewise, an ambitious **NI Biodiversity Action Plan** aligned with international targets to halt and reverse the decline of wildlife in NI is urgently needed, as well as updated **Priority Species and Habitats lists for NI**. A NI Biodiversity Action Plan has been included in Table 13: Protecting Nature on Land but has been omitted from Table 14: Protecting Nature at Sea. It is vital that the NI Biodiversity Strategy gives proper

attention to habitats and species found in the marine environment given that more than half of Northern Ireland's biodiversity is found beneath the sea.

'Through the Coastal Forum, DAERA, I, district councils and environmental stakeholders will work collaboratively to progress coastal management issues' - this target does not reflect the urgency with which Northern Ireland should be acting to address and plan for the severity of current and future coastal management issues. Northern Ireland faces major and increasing risks from coastal erosion and marine flooding, and we lack the basic information needed to make sound decisions around these risks. Northern Ireland is now entering a phase of rising sea levels that will cause a re-shaping of the coastline as it adjusts to these changing conditions. These changes will result in more frequent flooding, and a general tendency for shorelines to move landwards that will be experienced as erosion. **A strategic approach to shoreline management is urgently needed to address the challenges of marine flooding and erosion. Establishing a coastal observatory in Northern Ireland** is essential to provide the necessary support for decision-making in the current framework and in any future strategic approach. And the use of **nature-based solutions**, such as protection and restoration of plants and ecosystems (e.g., sand dunes, mudflats and saltmarshes), to resolve challenges like flooding-driven erosion should be prioritised.

The inclusion of overarching Sustainability, Ecosystem and Climate objectives in the Fisheries Act (2020) is encouraging in terms of the future sustainability and productivity of the fishing industry in Northern Ireland and across the UK. Equally, the Environment Strategy commitment to *'Develop fisheries policies aligned to objectives in UK Fisheries Act 2020'* is a critical aspect of achieving healthy, productive, biodiverse and clean seas in NI. However, it is unclear how such high-level legislation will manifest into specific and beneficial action for NI fish stocks while the Joint Fisheries Statement (JFS) is yet to be published (including associated Fisheries Management Plans).

Specific fisheries management measures directed by the Fisheries Act (2020) principles are urgently needed to address the already overexploited and depleted status of many fish stocks in the UK, including NI. In this context, the additional target in Table 18; *'Review the Fisheries Act (NI) 1966 and develop fisheries policies aligned with the objectives of the UK Fisheries Act 2020'*, is also urgently needed. The review needs to culminate in new NI legislation that enshrines the positive elements of the Fisheries Act (2020) but also goes further by including legal obligations to limit catch quotas to sustainable levels.

Table 15: Natural Capital

The requirement for strong evidence base is crucial to a natural capital approach and development of a natural capital asset register— this requires significant investment and a step change in approach to data collection – evidence collection must support extent, condition, functioning and connectivity assessment. The natural capital approach will not necessarily consider habitat condition and species composition and risks oversimplification, and we warn against this especially when considering resilience to the effects of climate change. The approach however raises awareness of the value of natural capital assets and the need for protection and positive management. It is now an integral element of Treasury guidelines in England guiding decision making and investment. We would like to see a similar approach adopted in Northern Ireland.

The strategy does not provide a timeframe for the development and implementation of a natural capital framework, how often the natural capital asset register would be updated/reviewed, and it is unclear how this framework could be used in decision-making, how will this affect, for example, biodiversity or environmental net gain in planning, and how will it work with the proposed Green Growth test (as per the Green Growth strategy). We also note that 'natural capital' is a human-centric approach, and does not incorporate intrinsic value of nature/rights of nature. We support the use of 'nature capital' more widely as part of a wider evaluation and decision-making tool, but emphasise that it should be only one in a suite of assessments used to support land use and planning decisions. Furthermore, the ambition should be to

increase natural capital, not simply to maintain it – in recognition of the overarching need to significantly improve our natural environment.

Q4a: Do you agree with Strategic Environmental Outcome (SEO) 4: 'Sustainable production & consumption on land and at sea'?

Yes.

Q4b: Are you content with SEO 4 tables (16 to 24)?

No.

Table 16: Future Agricultural Policy

It is unacceptable for a framework, Executive level strategy for significant improvement of our natural environment to contain so little information on agriculture. Agriculture exerts huge influence on the state of our natural environment, and its impacts extend from land to the coastal zone, affecting water quality (both freshwater and marine), air quality, biodiversity and climate change. As such, the vision, actions and targets for agriculture affect all SEOs within this strategy. We would like to see the high level vision, outcomes and targets in the Future Agricultural Framework included within the Environment Strategy, and cross referencing made to these throughout all SEOs. A number of the proposed regional initiatives such as soil sampling, nutrient management planning and LiDAR will be important tools in addressing some of the more complex issues.

Table 17: Energy

Achieving net zero carbon energy is essential to meet our commitment under the UK's Climate Change Act of a Net Zero greenhouse gas emissions target by 2050, and this is recognised in the Energy Strategy published in December 2021. Relevant, related, new and amended plans and programmes that flows from the strategy should be included in the table, such as, the **review of strategic planning policy for renewable and low carbon energy** currently being taken forward to ensure it remains fit for purpose to enable appropriate development in appropriate locations.

Future low carbon energy production activity, such as renewable energy projects, can only take place within ecological and environmental limits. It is essential that projects are assessed for their wider biodiversity impacts and the need to address the biodiversity as well as the climate crises is not lost. The understanding of the impacts of renewable energy devices on the wider environment as well as specific habitats and species remains in its infancy for marine renewables, and considerable advances in turbine technologies (both for terrestrial and marine renewables, including repowering, and energy storage) and energy saving technologies may minimise wider environmental impacts. **These require sustained research and development investment and a commitment to building a robust evidence base.**

In the marine realm, to enable future large-scale deployment of offshore wind difficult questions on compensation, mitigation and enhancement approaches - and mechanisms for delivery - must be asked and solutions found. **UW recommend a series of stakeholder workshops initially to discuss the issues and suggest possible solutions.** Discussions must centre around the ecological coherence of the MPA network and improvement to the Good Ecological Status of the marine environment.

Table 18: Productive and Sustainably Used Seas

Currently, there is still no marine plan in place for Northern Ireland. Therefore, it is only right that targets such as 'Adopt a 'Marine Plan for Northern Ireland' in 2022' and 'provide advice on implementation for

Marine Plan delivery are included in the Environment Strategy. An effective and **spatially prescriptive marine plan that prioritises nature positive and sustainable development** is absolutely crucial to the health, productivity and resilience of our seas, as well as the socio-economic prosperity of Northern Ireland. The **marine plan needs to take an ecosystem-based approach, be integrated with other policy frameworks** (UK Marine Strategy and the establishment of an ecologically coherent Marine Protected Area (MPA) network) **and allow room for nature preservation and restoration**.

The Marine Plan also needs to consider the consequences of planning decisions, especially those around marine/offshore renewables, such as fishing displacement and cumulative impacts. Targets to meet the following actions should be included:

1. Development of decision-making support tools to assess the key areas of interaction, potential trade-offs and the impact of spatial actions e.g., closing fisheries around an offshore wind farm
2. Build a robust evidence base for spatial prioritisation
3. Review the effectiveness of the Marine Plan

As stated previously, targets such as *'Review the Fisheries Act (N) 1966 and develop fisheries policies aligned with the objectives of the UK Fisheries Act 2020'*, *'By November 2022: Publish Joint Fisheries Statement'*, and the development of *'Fisheries Management Plans'* are welcome and critical for the sustainable future of the fishing industry in Northern Ireland. However, it is unclear how such high-level legislation will manifest into specific and beneficial action for NI fish stocks while the Joint Fisheries Statement (JFS) is yet to be published, including associated Fisheries Management Plans. Crucially, new fisheries policy and legislation in NI must enshrine the sustainability, ecosystem and climate objectives of the Fisheries Act (2020), but also go further by including legal obligation to limit catch quotas to sustainable levels. We cannot shy away from the historic impact on marine biodiversity and ecosystem function that commercial fishing has had, similarly to agriculture has had on land, and ensure that policy enable restoration and recovery of ecosystems while supporting a level of sustainable food production.

Other targets such as *'Evaluate climate change scenarios and potential impacts on coastal habitats, fisheries & aquaculture'*, *'Publish a comprehensive baseline of marine Natural Capital'*, and investment in *'the protection and enhancement of blue carbon habitats and the wider marine environment'* are welcome. These targets again highlight the need for a Northern Ireland Blue Carbon Action Plan mentioned previously.

Tables 19 – 22.

These areas are outside of Ulster Wildlife's expertise, however we would emphasise that the biodiversity and climate impacts of supply chains should be managed and reduced.

We would like to emphasise the need to enforce planning conditions that are made with the objective of protecting nature or preserving biodiversity.

Single-use plastics action must include the ecotoxicological impact of such plastics following their breakdown into smaller particle sizes and the adsorbed substances they may also hold. The wider impacts on wildlife and human food chain accumulation must be fully acknowledged and responded to.

Q5a: Do you agree with Strategic Environmental Outcome (SEO) 5: 'Zero waste & highly developed circular economy'?

Yes.

Q5b: Are you content with SEO 5 tables (25 to 27)?

Outside of area of expertise.

Q6a: Do you agree with Strategic Environmental Outcome (SEO) 6: 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability'?

Ulster Wildlife believes that we should show the highest possible ambition in terms of greenhouse gas emissions targets, in recognition of the Climate Emergency and that climate change is the single biggest threat to nature and to humanity. However, we welcome the recognition of the need for climate change resilience and adaptation action. From working with businesses we are also aware of the importance of achieving net zero to remain competitive and viable in global markets.

Q6b: Are you content with SEO 6 table (28)?

No.

The table is based on enactment of the Climate Change (No. 2) Bill – the DAERA Departmental climate change bill. This is presumptive given that currently two Bills are going through the legislative process which have differing emissions targets. We do agree that a key action will be achieving legislative passage of a Climate Change Bill and that carbon budgets will be required as an outworking of the bill, supported by sectoral plans.

Q7: Did you find the Environment Strategy content user friendly and easy to follow?

As it stands, The Strategy content is not user friendly. There is great inconsistency in levels of detail and application within tables, heavy use of acronyms and reliance on other strategies and plans that the reader cannot readily access or scrutinise. There is a general lack of SMART targets or consistency of timeframes, and there has been no real attempt at integration between the tables and SEOs.

Q8: Do you have any other comments or contributions?

In summary, we would like to make the following key points:

- Legally-binding targets are essential for the Environment Strategy to secure nature's recovery – this requires additional policy/legislation to mandate this.
- To galvanise the necessary action quickly, targets need to be specific, measurable and time-bound. Crucially, they need to be ambitious- a transformation in how we interact with the environment around us and how we restore nature and all it does for us. We request a table which sets out all the targets and shows what equivalent targets have been set in the rest of the UK and, if comparable targets exist, in Ireland. This would help to demonstrate the scale of our ambition and the extent of the challenge we face here.
- Nature must be restored coherently on land and at sea both within and outside of protected sites, with protected sites effectively managed and connected as core sites in a landscape-scale Nature Recovery Network, and supported by robust monitoring.
- Habitat restoration must address the biodiversity crisis but also support our response to climate change, making our environment more resilient and supporting human quality of life. Key habitats play an exceptional role in locking away carbon and also in reducing climate change impacts such as flooding and erosion- such as our peatlands, species-rich grasslands, forests and hedgerows, saltmarsh, seagrass, shellfish reefs and marine sediments. These are 'Nature-based solutions' to climate change and require protection, restoration and creation at scale.
- Develop and introduce biodiversity net gain in planning decisions- to ensure we uphold the ability of nature to support us and to tackle the nature crisis.
- Farming and land use policies must enable and incentivise landowners and managers to support biodiversity recovery and climate change action, such as through nature-friendly farming: agriculture covers 75% of Northern Ireland's landmass which represents a huge opportunity to support nature while encouraging sustainable local healthy food production.

- Linkage should be made to the current Draft Budget issued by Minister Murphy before Christmas, and an assessment of the impact of the proposed Draft Budget allocations on delivery of environmental targets over the next three years and beyond. Adequate resourcing is essential to implement significant environmental improvement and this is likely to require innovative financing models, but at a minimum assurance is needed on the level of government financial commitment to the Environment Strategy.

Finally, we believe that an Environment Strategy (and our incoming Environmental Improvement Plan) that will truly address the biodiversity and climate crises should be developed through a **co-production approach** where a broad partnership is developed which can ensure that everyone with a part to play is involved more actively in the design and delivery of policy. This should involve government, businesses, industry, NGOs and individual citizens, including young people. An appropriately scaled response to restoration of our environment will need a more participative process as opposed to the traditional approach where departments invite views and then go away and write a draft policy. Genuine co-production will need a more active, collaborative way of working. This may take time to embed (and may be uncomfortable for some policy-makers) but it will lead to better policy and faster delivery. We can humbly make the point that we, and other NGOs, have expertise and capacity to share the burden which DAERA undoubtedly faces, and we call upon the Department to make full use of this.