

Environment and Nature Restoration Bill Consultation 2025

Ulster Wildlife, NI's largest local nature conservation charity, has long supported the adoption of legal targets for nature recovery in line with the ambitions of this PMB. Consecutive government Biodiversity Strategies have failed to halt the decline in nature in NI and it is time to legislate before it's too late to turn the curve on nature's decline. It is only with legal targets in place that the level ambition required will be set and resources and actions delivered to truly bring nature back locally. The risk to our ongoing social and economic prosperity of not dealing with the nature crisis is now starting to be recognised by government and financial institutions and investing in nature recovery reduce significant financial and societal risk and will bring about long term gains for communities.

Current Environmental Legislation and Policy in Northern Ireland

5. Do you believe that the current environmental policy and legislation in Northern Ireland is sufficient/adequate to address current environmental challenges?

Yes

No

Unsure

Other (please specify)

6. Is the Northern Ireland Executive doing enough to deliver environmental protection and restoration?

Yes

No

Unsure

Other (please specify)

7. Do you agree that additional resources should be dedicated to tackling the environment and nature crisis?

Yes

No

Unsure

Other (please specify)

8. Please share any other comments you have below:

A number of OEP reports have highlighted the failings in our existing government policy to protect nature - including water quality, ammonia, designated sites management and biodiversity decline. The OEP has recently stated that in NI there is currently - Unsustainable pressures on the environment; Ineffective implementation of environmental laws; Governance that failed to address key environmental pressures; and Delays in putting in place vital plans to drive change; and have called for urgent action from the government. Given these previous failures, we believe that legal targets for nature recovery should be brought in to ensure meaningful government action including the allocation of appropriate resources for delivery. A healthy natural environment underpins human prosperity and health and we are currently operating beyond our natural environment's ability to function correctly and support us.

Government strategies are not enough to ensure progress and legal targets should drive positive action for the recovery of the natural support systems that we rely upon including clean air, clean water, pollination and soil health. Restoring nature isn't just about protecting wildlife—it's about safeguarding the systems that make human life possible. The more we delay, the more expensive and less effective our efforts will be. Restoration is an investment in resilience, security, and future prosperity. All other jurisdictions in the UK and Ireland and the wider EU either have or are in the process of implementing legal targets for nature recovery and our citizens and nature deserve the same. NI should not be any different in this regard.

Contents of the Bill

9. Do you agree that the overarching purpose of the Bill should be to secure and maintain a healthy resilient natural environment?

Yes

No

Unsure

Other (please specify)

10. Which of these areas do you believe should be covered in the bill?

Air Quality - ✓

Soil Quality - ✓

Biodiversity and Species Abundance - ✓

Water Quality - ✓

Waste Reduction and Resource Efficiency - ✓

Other (please specify) – Light and noise pollution - ✓

11. The Nature Recovery Network is a key part of the Environmental Improvement Plan for England, Scotland and Wales. It is a growing national network of wildlife-rich places, stretching from our cities to countryside, mountains to coast. It is supported by green and blue spaces that buffer and connect these wildlife-rich sites.

Do you believe that Northern Ireland should create a wildlife-rich nature recovery network?

Yes

No

Unsure

Other (please specify)

12. Do you agree that, in order to improve public health, the Bill should aim to reduce levels of air pollution so that we match the World Health Organisation's guidelines?

[WHO Air Quality Targets](#)

Yes

No

Unsure

Other (please specify)

13. Please share any other comments you have below:

We would like to see a clear definition of a National Nature Recovery Network in the legislation along with the mechanisms that would be used to achieve it.

We have significant concerns around water quality both fresh water and marine with significant levels of pollution continuing to enter all our watercourses. From a nature perspective and it is clear that existing processes such as River Basin Management Plans haven't delivered as expected and so we welcome the inclusion of water quality in the PMB.

Beyond environmental damage, ammonia also contributes to the formation of fine particulate matter (PM2.5) in the atmosphere, which is a serious public health concern, linked to respiratory and cardiovascular illnesses. Addressing ammonia emissions is therefore crucial for not only meeting conservation objectives under national and international obligations but also for improving air quality and safeguarding public health.

Target Setting

14. Do you believe that there should be both short and long-term targets for nature's recovery for Northern Ireland?

Yes

No

Unsure

Other (please specify)

15. The Significant Improvement Test has been adopted under the Environment Act 2021 to assess whether meeting statutory environmental targets improve the natural environment.

Significant Improvement Test

Do you agree that achievement of targets should be measured on the basis of a Significant Improvement Test? If not, on what should it be measured?

Yes

No

Unsure

Other (please specify) Would suggest reviewing what is done in other jurisdictions and implementing a best practice approach following this review.

16. Do you agree that all Government Departments should be required to meet the environment and nature restoration targets?

Yes

No

Unsure

Other (please specify)

17. Please share any other comments you have below:

Both short term and long term targets are important – short-term ones to drive action immediately and longer-term as nature recovery can take some time due to the degraded nature of our local natural environment. It is important that sufficient resources are allocated to monitoring progress towards targets.

It is important that nature recovery is a requirement for all Government Departments similar to climate action plan requirement through the Climate Act. The public sector are significant landowners and combined actions across the public estate could make a difference alongside policies which promote nature recovery in government funding streams and work programmes.

We note that there is often a lack cross departmental working between and within Government Departments, which hinders progress and misses opportunities for joined up thinking and economies of scale and this should be addressed by setting up a cross departmental working group to deliver on the outcomes of the Act should it be taken forward.

The Role of the Department for Agriculture, Environment and Rural Affairs (DAERA)

18.Should DAERA be required to report on whether targets have been met or not, and explain why?

We would recommend a requirement for public body reporting similar to the Climate Act. We would support DAERA fulfilling the role as lead Department on this work.

19.Do you agree that DAERA should commit to prohibiting the regression of environmental standards?

'Regression of environmental standards' refers to a situation where environmental laws, regulations, or policies that were previously in place to protect the environment are weakened, reduced, or rolled back.

Yes

No

Unsure

Other (please specify)

20.Please share any other comments you have below:

It is important that robust accountability processes are included as part of this work and that it is resourced appropriately. We are already falling on many environmental indicators and are not meeting deadlines for improvement so it is important non-regression is enshrined in law so there is no risk of weakening regulatory targets.

Environmental Governance

21. Do you agree that all public authorities and/or Northern Ireland Departments should be required to act in a manner that conserves and enhances the natural environment?

Public Authorities

Northern Ireland Government Departments

Both

Unsure

Other (please specify)

22. Environmental principles offer protection to the natural environment by providing guidance to public authorities when making decisions on issues such as new laws, planning applications, and management of protected areas.

DAERA recommend 5 environmental principles in their Environmental Improvement Plan (p13) including:

- the principle that environmental protection should be integrated into the making of policies;
- the principle of preventative action to avert environmental damage;
- the precautionary principle, so far as relating to the environment;
- the principle that environmental damage should as a priority be rectified at source; and
- the polluter pays principle.

[DAERA Environmental Improvement Plan](#)

Do you agree that public bodies should be required to apply the additional environmental principles:

- The principle of non-regression of environmental standards,
- The principle of avoiding transboundary harm.

'Regression of environmental standards' refers to a situation where environmental laws, regulations, or policies that were previously in place to protect the environment are weakened, reduced, or rolled back.

'Transboundary Harm' is damage that occurs in one country but affects another country. It can occur through land, water, or air.

Yes

No

Unsure

Other (please specify)

23. Please share any other comments you have below:

Environmental Principles are important but how they are enforced or implemented is not clear under current government policy so this should be strengthened if possible through this new legislation.

Enforcement of Targets

24. When balanced against the benefits of this legislation, do you think that any cost of implementing and enforcing the proposed bill is acceptable?

Yes

No

Unsure

Other (please specify)

25. Do you believe the bill should include sanctions for departments who fail to meet targets?

Yes

No

Unsure

Other (please specify)

26. If so, who do you feel would be best placed to oversee this?

E.g. DAERA, the Office for Environmental Protection (OEP), an independent oversight body etc.

We are unsure what sanctions would be possible outside of existing mechanisms and consider that this may already be covered in the role of the OEP and NIEA or an equivalent independent Environmental Protection Agency should one be put in place following the review of environmental governance exercise that is currently ongoing. Government Departments should not be allowed to rely on 'Crown Immunity' to avoid legal sanctions for environmental breaches and failures which would apply to non-governmental organisations and businesses".

27. Any additional comments/concerns surrounding the enforcement of environmental targets below:

We have concerns about the current lack of enforcement and how this would be addressed in the new legislation and also the lack and level of fines that are currently levied for breaches of environmental regulations. Going forward there would need to be

sufficient resources provided to enforce the principles, through whichever bodies were responsible.

28. Please share any other comments you have below:

Summary

29. To what extent do you support the ambitions of the bill?

A great deal

A lot

A moderate amount

A little

None at all

30. If you do not agree with the Member's proposal, what alternative proposal would you support to achieve this policy objective?

N/A

31. Please share any other comments you have below: