

# Environment Strategy for Northern Ireland

## Public Discussion Document



September 2019

*A living, working, active landscape valued by everyone.*



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

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**INVESTORS  
IN PEOPLE**

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Neighbourhood Environment Quality Branch  
Department of Agriculture, Environment and Rural Affairs  
Regulatory and Natural Resources Policy Division  
2nd Floor, Klondyke Building  
1 Cromac Avenue  
Gasworks Business Park  
Belfast  
BT7 2JA

Email: [esni@daera-ni.gov.uk](mailto:esni@daera-ni.gov.uk)

# Contents

1. Introduction .....	2
2. Programme for Government .....	3
3. Environmental Principles .....	4
4. An Environment Strategy - why now? .....	4
5. How are we doing? .....	6
Fig. 1: Greenhouse Gas Emissions .....	6
Fig. 2: NI Greenhouse Gas Emissions by Sector .....	7
Fig. 3: Household Waste Recycling .....	8
Fig. 4: Annual mean concentration of Nitrogen Dioxide .....	9
Fig. 5: Soluble Reactive Phosphorus in our rivers .....	10
Fig. 6: Levels of Dissolved Inorganic Nitrogen in our marine waters .....	11
Fig. 7: Biodiversity - % of protected terrestrial area under favourable management .....	12
Fig. 8: Biodiversity - % of protected marine area under favourable management .....	12
6. Our approach.....	13
7. Strategy Scope .....	14
8. Strategic Themes .....	17
Environmental Engagement.....	18
Environmental Prosperity.....	19
Environmental Efficiency .....	21
Fig. 9: Main sectoral contributors to NI Greenhouse Gas Emissions .....	21
Fig. 10: The Waste Hierarchy .....	22
Fig. 11: Resource efficiency and the circular economy .....	23
Environmental Quality .....	24
Fig. 12: Rivers - Water Framework Directive (WFD) overall classification .....	27
Fig. 13: Lake Water Framework Directive status, 2015 and 2018 .....	27
Fig. 14: Marine - Water Framework Directive overall status in transitional and coastal waters (number of marine water bodies), 2015 and 2018 .....	28
Fig. 15: Litter and dog fouling .....	29
9. Environmental Governance.....	30
10. Draft Outcomes.....	32
11. What's the Big Idea? .....	33
12. How to Respond .....	34
Freedom of Information Act 2000 - Confidentiality of Consultations .....	35
Annex A - Comments and feedback from stakeholder event on 7 May 2019.....	36
Annex B - Other strategies relevant to a possible Environment Strategy.....	38
Annex C - PfG Outcomes mapped against possible Environment Strategy themes/outcomes and DAERA vision .....	39

# 1. Introduction

It is a fundamental premise of a civilised society that everyone should have the right to live in a healthy environment, with access to sufficient and appropriate environmental resources for a healthy life. Northern Ireland's environment is its most important asset and it is crucial to each and every one of us. It is one of the main reasons people from other countries and regions visit, bringing money into the local economy and raising our profile around the world. It affects our economy, our health and well-being, and it facilitates social interaction. Clean air, good quality water and the green and blue spaces, to which we have access, are part of our 'natural capital' - while opportunities for outdoor recreation contribute significantly to our physical and mental wellbeing. (Natural capital is the world's stock of natural resources, including geology, soils, air, water and all living organisms).

However, the importance of the environment goes far beyond the immediate benefits it can provide. Our environment is a unique asset; sustaining its landscape and biological diversity also makes a small but significant contribution to protecting a much wider global ecosystem which sustains life on earth. We therefore have a responsibility to protect and enhance this asset for the benefit of future generations.

Effective care of the environment provides very real benefits in terms of improving health and wellbeing, promoting economic development and addressing the social problems which result from a poor quality environment. We are fortunate to have a relatively good environment. However, recent assessments have identified that our environment is under threat and we are faced with the challenge of how to protect our important natural asset, while supporting its sustainable use.

We have particular challenges in Northern Ireland, due to the very different characteristics of our economy, our geographical location and other factors, such as the continued prevalence of coal and oil as fuels, all of which increase pressures on the environment from agricultural, transport, energy supply and residential sources. The environmental issues that we need to address are wide-ranging and complex, requiring a joined up approach involving a range of stakeholders, including: other Departments and public sector bodies; the private sector; the community and voluntary sector; and the general public, working together with the Department of Agriculture, Environment and Rural Affairs (DAERA).

A Northern Ireland Environment Strategy ("the Environment Strategy") is required to form the basis for a coherent and effective set of interventions that can deliver real improvements in the quality of the environment and thereby improve the health and well-being of our citizens, create opportunities to develop our economy and play our part in protecting the global environment for many decades to come.

## 2. Programme for Government

The draft Programme for Government (PfG) for the 2016 - 2021 Assembly mandate was published in May 2016 and during the current period without an Executive is being taken forward as the Northern Ireland Civil Service (NICS) Outcomes Delivery Plan, which focuses on 12 Outcomes across all functions of government. DAERA is the designated lead department for Outcome 2: ***We live and work sustainably - protecting the environment***, and for 5 of the 6 associated indicators:

- Greenhouse gas emissions;
- % household waste that is reused, recycled or composted;
- Annual mean nitrogen dioxide concentration at monitored urban roadside locations;
- Levels of soluble reactive phosphorus in our rivers and levels of Dissolved Inorganic Nitrogen in our marine waters;
- Biodiversity (% of protected area under favourable management).

The sixth indicator, the percentage of all journeys which are made by walking/cycling/public transport, is led by the Department for Infrastructure. Figs. 1 - 8 show how we are doing with regard to these indicators.

However, the environment is all-encompassing and in good and healthy condition can contribute to many, if not all, of the PfG outcomes.

*“Ultimately, health and prosperity depend on our natural environment. Achieving economic growth at the cost of its degradation through over-exploitation or pollution is not sustainable.”*  
(Draft Programme for Government Framework 2016 - 21, p.19).

At a Departmental level, our vision is: ***A living, working, active landscape valued by everyone***. This is at the centre of everything DAERA does and, ultimately, is what the proposed NI Strategy has to support and deliver.

This vision is supported by 4 strategic outcomes:

- Sustainable agri-food, fisheries, forestry and industrial sectors;
- Clean, healthy environment, benefiting people, nature and the economy;
- Thriving rural economy, contributing to prosperity and wellbeing; and
- Well led, high performing organisation focused on outcomes.



## 3. Environmental Principles

While we will take a lead from our draft Programme for Government and Departmental strategic outcomes, we must also be mindful that there is a broader environmental agenda to be considered. Currently, we are guided by a set of international environmental principles, such as the precautionary and polluter pays principles, embedded in the EU Treaties. After withdrawal from the European Union we will continue to be guided by environmental principles, set either at UK or devolved level.

The draft Environment (Principles and Governance) Bill was published by the UK Government in December 2018. The draft Bill enshrines environmental principles in domestic law and provides for the establishment of a new independent body (the Office for Environmental Protection (OEP)) to address roles currently undertaken by EU institutions which will cease to apply once we leave the EU. The Bill will also give legal status to the UK Government paper - A Green Future: Our 25 Year Plan to Improve the Environment.

Currently the draft Bill applies only to England and to reserved matters across the UK but DAERA officials are currently working with Defra to retain the option for returning Ministers to extend the Bill's provisions to Northern Ireland. However, no decision has been taken to introduce these provisions here and the inclusion of the relevant clauses simply allows future Ministers to take such a decision if they decide this is appropriate, or to decide on alternative arrangements.

## 4. An Environment Strategy - why now?

Northern Ireland has never had an all-encompassing environment strategy. There are a number of reasons for the development of such a strategy now:

### **(a) Environmental Challenges**

There are many major environmental challenges facing us, including (but not confined to): the management of waste and the development of a circular economy; waste crime; air quality (due in large part to the proliferation of diesel-engined vehicles on our roads); local environmental quality (litter, dog fouling and dilapidation being the most visible of these issues); biodiversity loss; soil quality etc.

In addition, there are challenges that exist in reconciling agricultural and environmental policy, particularly in areas such as agricultural greenhouse gas emissions, the effect of run-off of nitrogen and phosphorus on water quality and the impact of ammonia emissions on designated sites and priority species - with recent trends going in the wrong direction.

**(b) Climate Change**

A number of international environmental experts and organisations have stated that we are now in a “climate and environment emergency” and the UN’s Intergovernmental Panel on Climate Change warned last year that, “...*humankind has less than 12 years to avoid potentially irreversible climate disruption.*”<sup>1</sup> The UK Parliament passed a motion on 1 May calling on the UK Government to declare a climate emergency (as many other public authorities have done). There is now significantly increased public awareness (particularly amongst younger people) and concern about what is happening to our planet through climate change, plastic waste, shale gas extraction, loss of habitats etc. and increased activism as a result.

**(c) UK Government 25 Year Plan**

In January 2018, UK Government published *A Green Future: Our 25 Year Plan to Improve the Environment* (“the UK Plan”), which laid out the UK Government’s vision (largely for England) for a post-Brexit environment. This is set to be given significant legal status through the provisions of the UK Environment (Principles and Governance) Bill.

**(d) Brexit**

Brexit will also bring specific challenges for Northern Ireland - for example: what form will agricultural subsidies take after withdrawal; who will monitor environmental performance, and against what standards; what will fisheries policy look like; how will Brexit affect the agri-food sector etc? Uncertainty breeds concern and DAERA is keen to provide reassurance that we will continue to protect and improve the environment after the UK leaves the EU and provide appropriate support to agricultural and business interests.

**(e) Knowledge Gaps**

There are still significant knowledge gaps with regard to environmental performance here, including a lack of local data in a number of areas. Colleagues in Defra are currently developing additional metrics to support the UK Plan and this also will be an important focus as we develop the Environment Strategy.

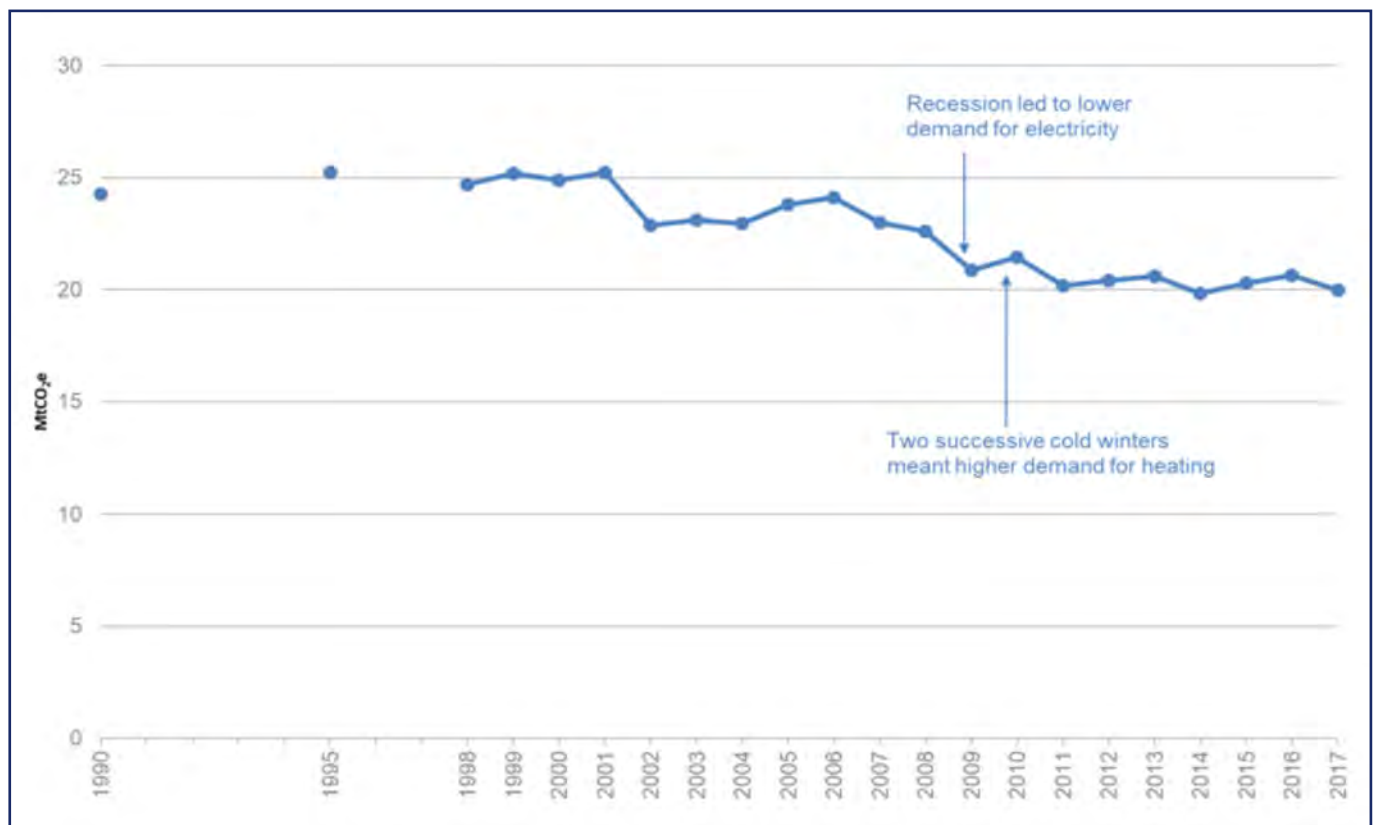
<sup>1</sup> [IPCC Special Report \(2018\)](#)

## 5. How are we doing?

In truth, our environmental performance is something of a mixed bag. Some things we have done well - the success of the carrier bag levy and household recycling rates, for example - while others have been more difficult to achieve, such as reductions in greenhouse gas emissions (GHGs). This section looks at how we are doing in respect of our PfG indicators in a little more detail but, of course, there are many other environmental performance indicators, which are reflected in the [Environmental Statistics Report](#), published annually by DAERA. While we have a good deal of environmental information in the Environmental Statistics Report and other published data, we know there are significant gaps in our understanding of the state of the environment and need to look critically at the available data and consider whether we are measuring the right things and using the appropriate metrics to do so.

Progress on DAERA's PfG Indicators:

### Greenhouse Gas Emissions



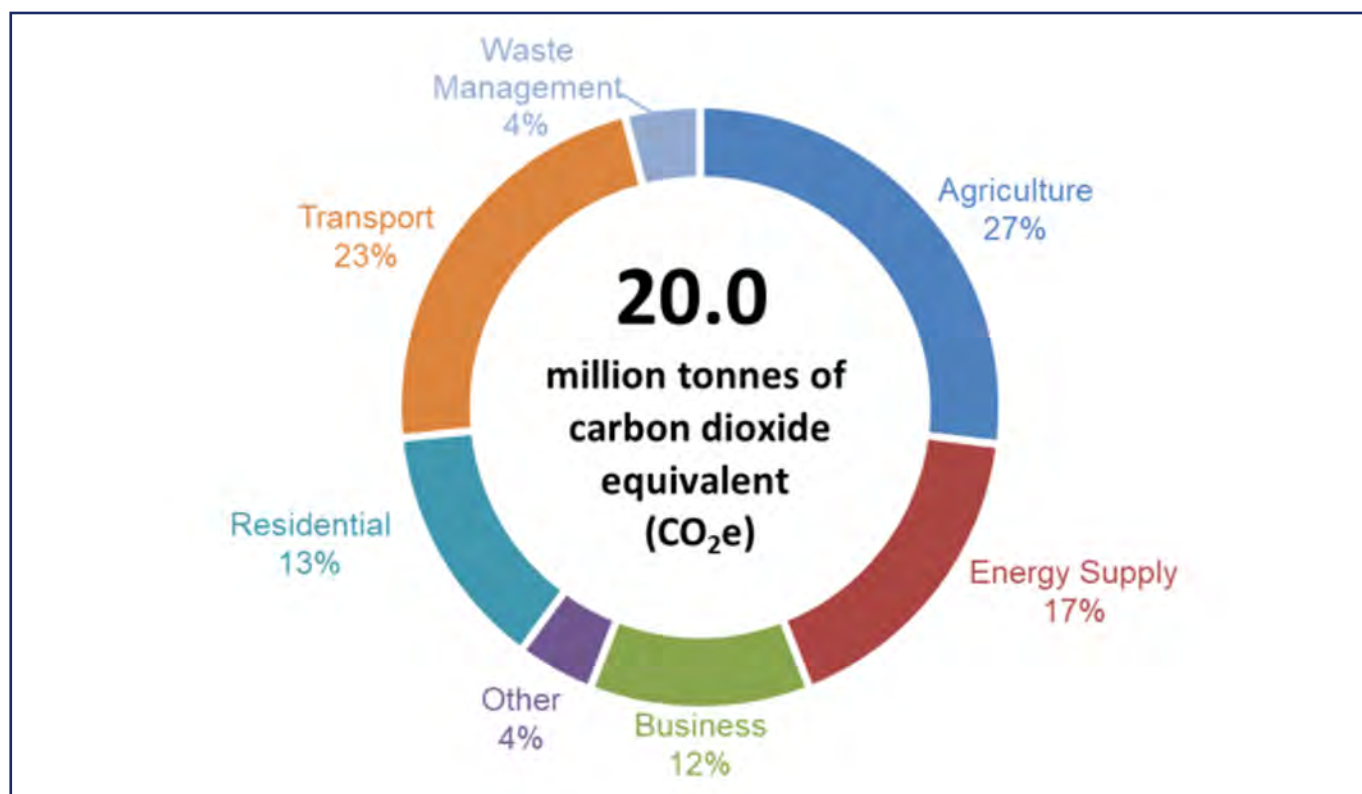
**Fig. 1: Greenhouse Gas Emissions** (Northern Ireland Greenhouse Gas Emissions 2017, DAERA)

Greenhouse gas emissions figures are based on estimates of emissions (published annually since 1990). These estimates are consistent with the UN's Framework Convention on Climate Change. In 2017, Northern Ireland accounted for 4% of the UK total.



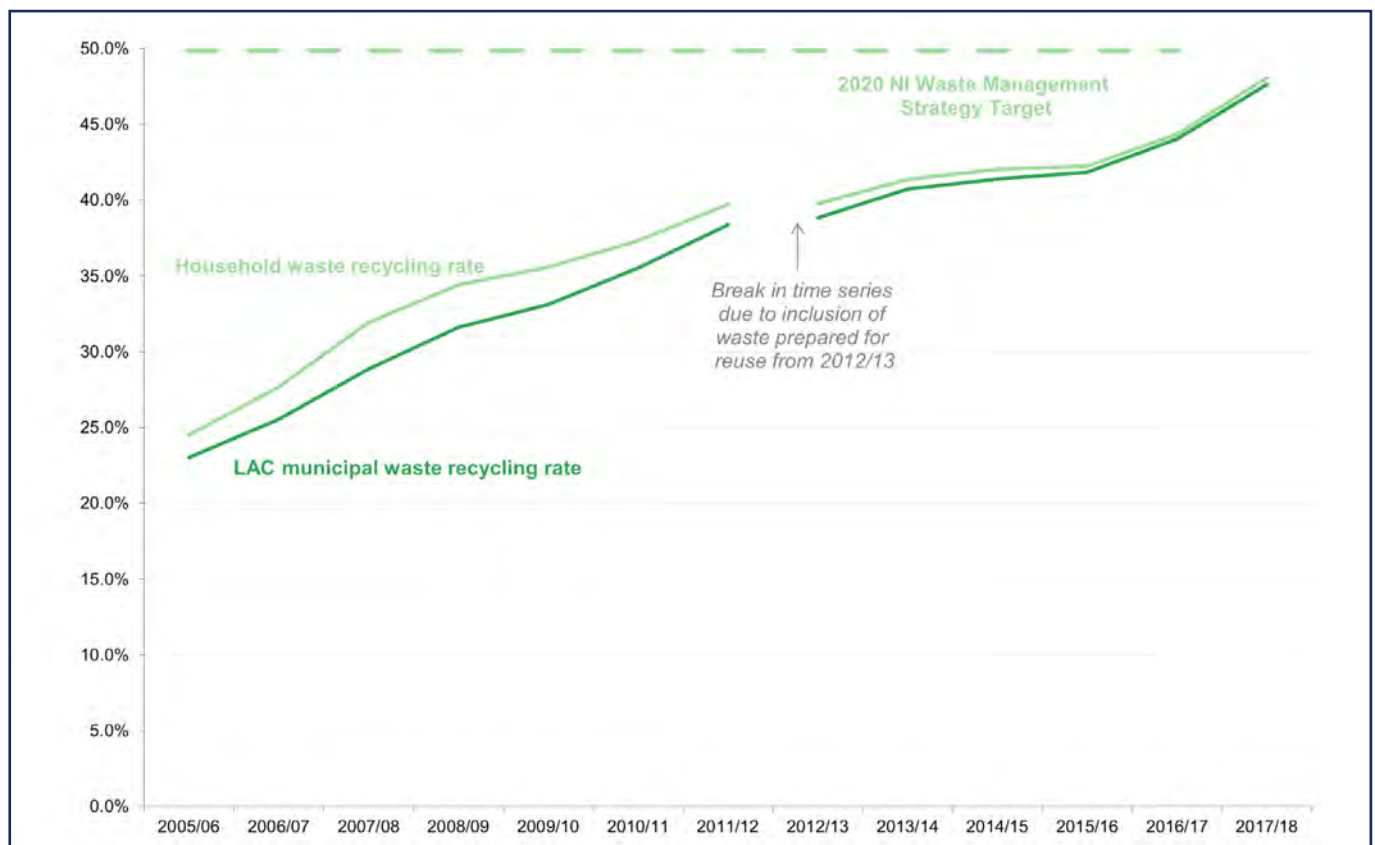
The UK Climate Change Act commits the UK to at least an 80% reduction by 2050 (from 1990 levels).

Our emissions decreased by 17.9% from 24.3 to 20 million tonnes of carbon dioxide equivalent between 1990 and 2017. Emissions come from a range of sources but agriculture, transport and energy supply account for around two thirds of the total.



**Fig. 2: NI Greenhouse Gas Emissions by Sector** (Northern Ireland Greenhouse Gas Emissions 2017, DAERA)

## Household Recycling



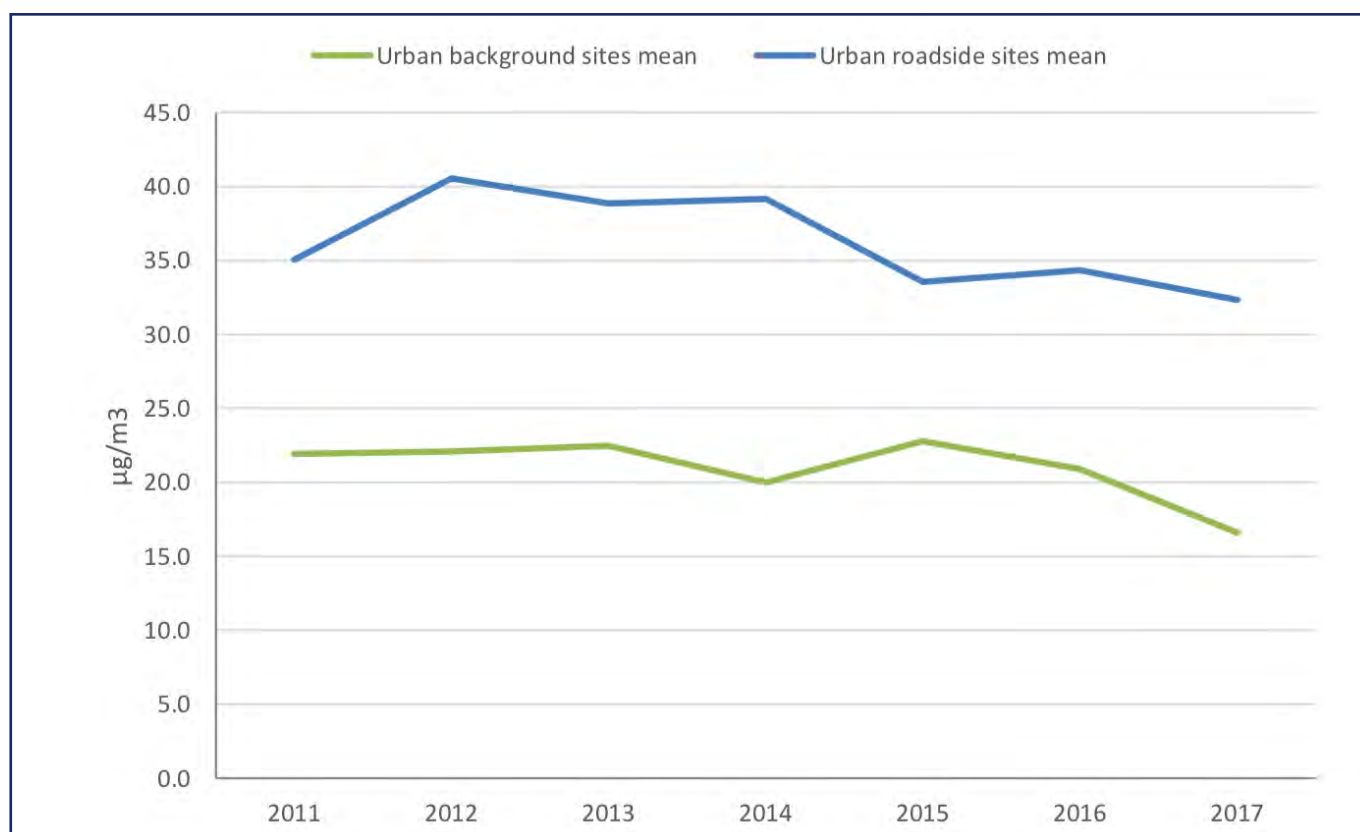
**Fig. 3: Household Waste Recycling** (NI Environmental Statistics Report 2019)

Reuse, 'dry' recycling (e.g. cardboard, metal, plastic, paper) and composting all contribute to our overall recycling rate. The data includes materials collected for recycling through your recycling bin/boxes and household waste recycling centres.

Recycling is becoming much more common. The household waste recycling rate was 48.1% in 2017/18, an increase from 44.3% the previous year. The tonnage sent for recycling recorded a new high of over 420,000 tonnes.

The baseline year for PfG reporting purposes is 2014/15. This was a 6.0 percentage point increase on the 2014/15 level and, therefore, household waste recycling is considered to have seen a positive change since the baseline year.

## Air Quality



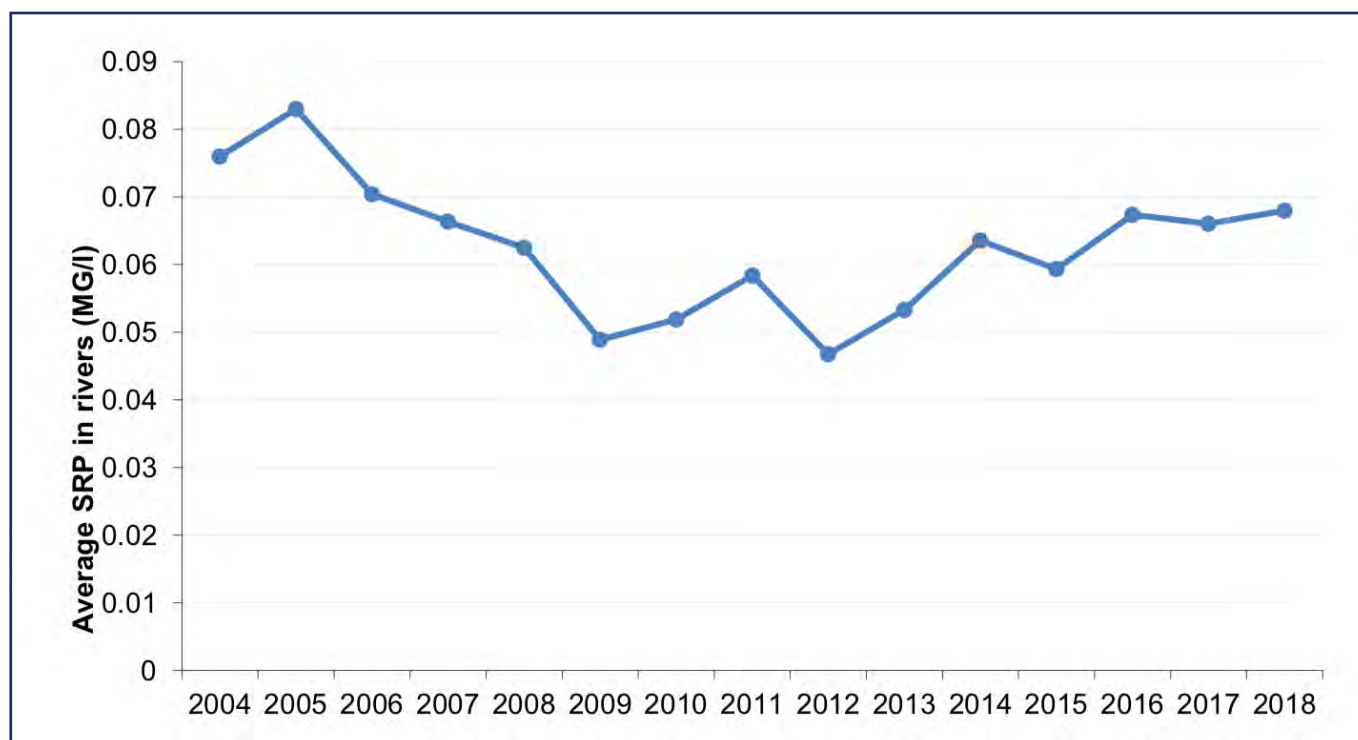
**Fig. 4: Annual mean concentration of Nitrogen Dioxide** (NI Environmental Statistics Report 2019)

Nitrogen dioxide is an air pollutant produced as a result of road traffic and other fossil fuel combustion processes. It can irritate the lungs and lower resistance to respiratory infections such as influenza. Continued or frequent exposure to adverse concentrations may cause increased incidence of acute respiratory illness in children.

The UK Air Quality Strategy sets objectives for an hourly mean limit of  $200\mu\text{g}/\text{m}^3$  (which should not be exceeded more than 18 times per year). In addition, there is an annual mean limit of  $40\mu\text{g}/\text{m}^3$ . The average background figure in urban areas has remained relatively stable over recent years (between  $20$  and  $23\mu\text{g}/\text{m}^3$ ). In 2017 the average annual mean concentration of  $\text{NO}_2$  was  $17\mu\text{g}/\text{m}^3$  across urban background sites.

However roadside levels have been more variable, increasing from  $35.1\mu\text{g}/\text{m}^3$  (2011) to  $40.6\mu\text{g}/\text{m}^3$  (2012) before falling to  $32.3\mu\text{g}/\text{m}^3$  in 2017.

## River and Marine Water Quality

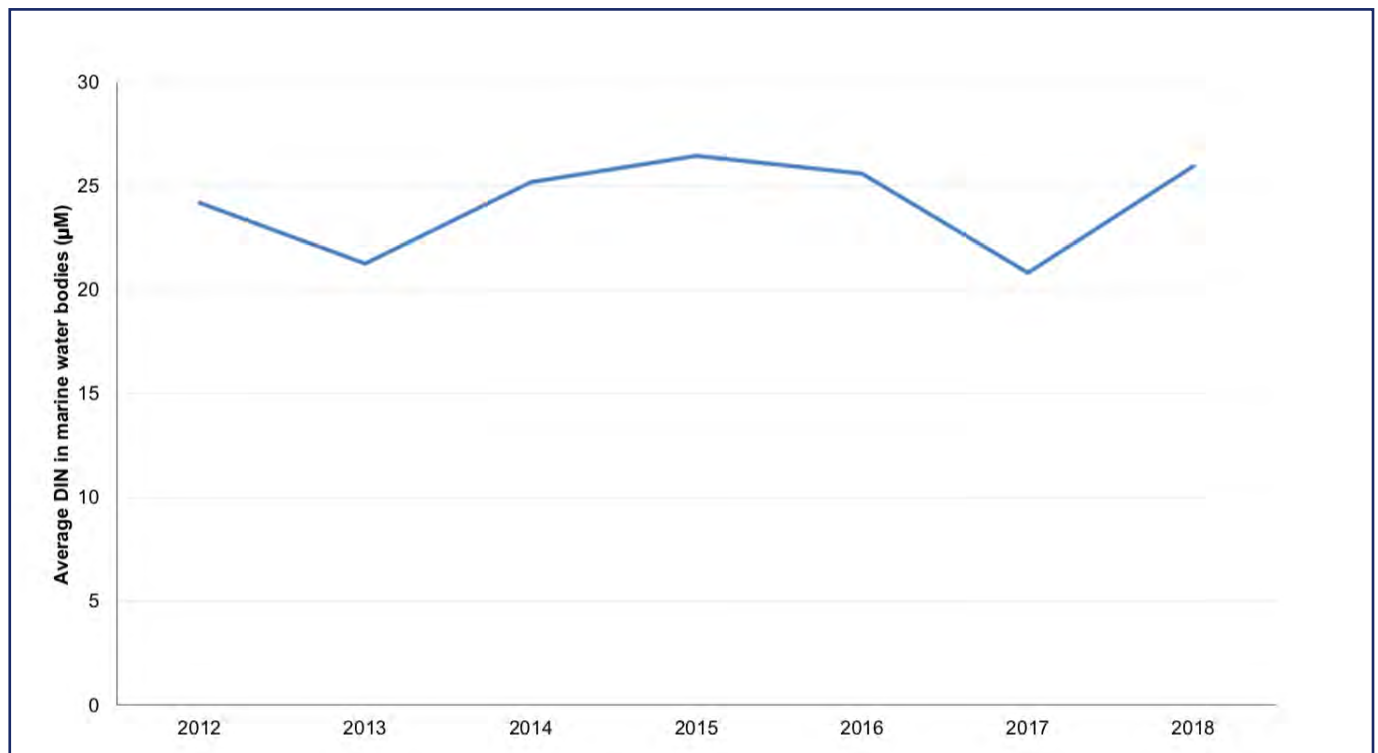


**Fig. 5: Soluble Reactive Phosphorus in our rivers** (NI Environmental Statistics Report 2019)

Soluble reactive phosphorus (SRP) is a plant nutrient which can lead to rapid growth of algae and other plants in rivers. The impact on the type and abundance of plant species can negatively impact other aspects of water quality (e.g. oxygen levels) and the characteristics of river habitats. These changes can cause undesirable disturbances to populations of water animals, such as invertebrates and fish.

In recent years, levels of soluble reactive phosphorus in the 93 surveillance rivers have increased and it is a cause for concern that there are signs of a sustained upward trend, since the low of 0.047 mg/litre reported in 2012. In 2018 the average concentration was 0.068 mg per litre of water.

SRP in river water is considered unchanged since the baseline year for PfG reporting purposes.



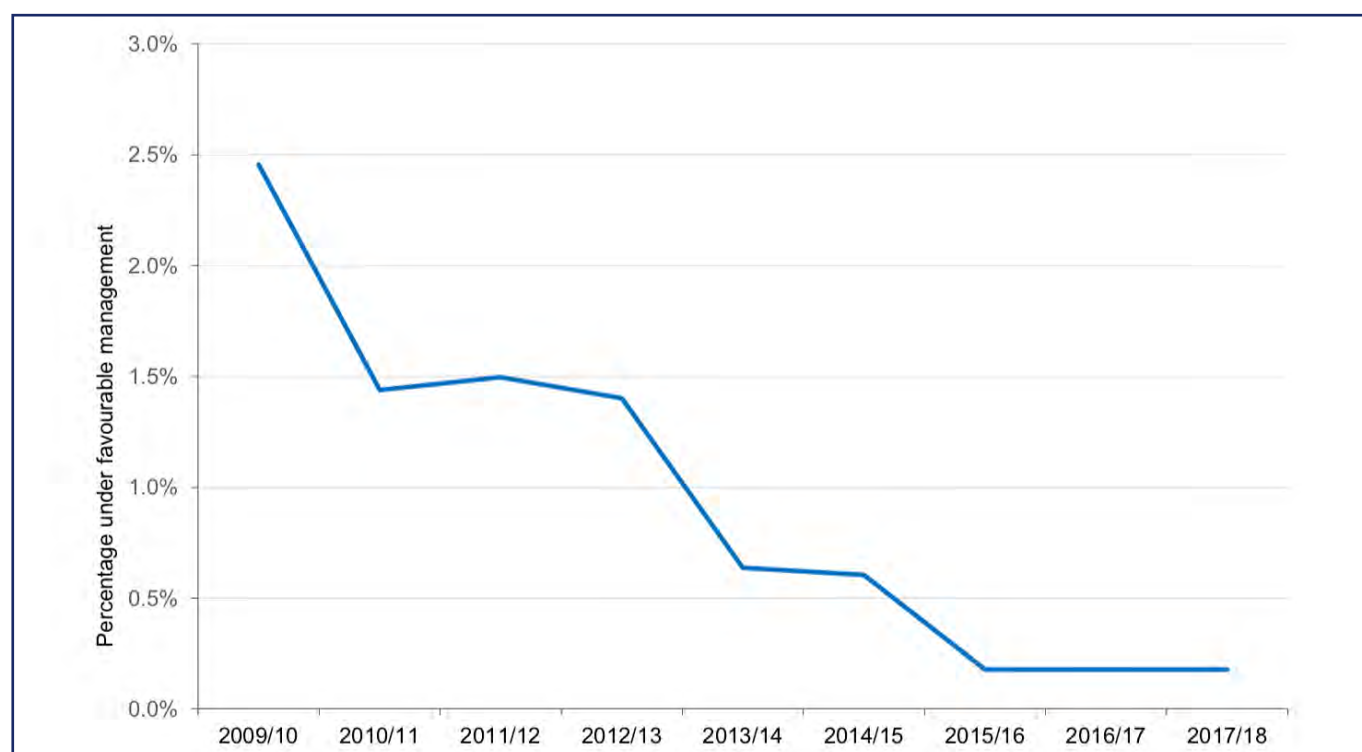
**Fig. 6: Levels of Dissolved Inorganic Nitrogen in our marine waters** (NI Environmental Statistics Report 2019)

In temperate regions, nutrient concentrations in coastal waters are highest in winter, when agricultural run-off is highest due to increased rainfall, and algal growth is lowest due to lack of light and lower temperatures.

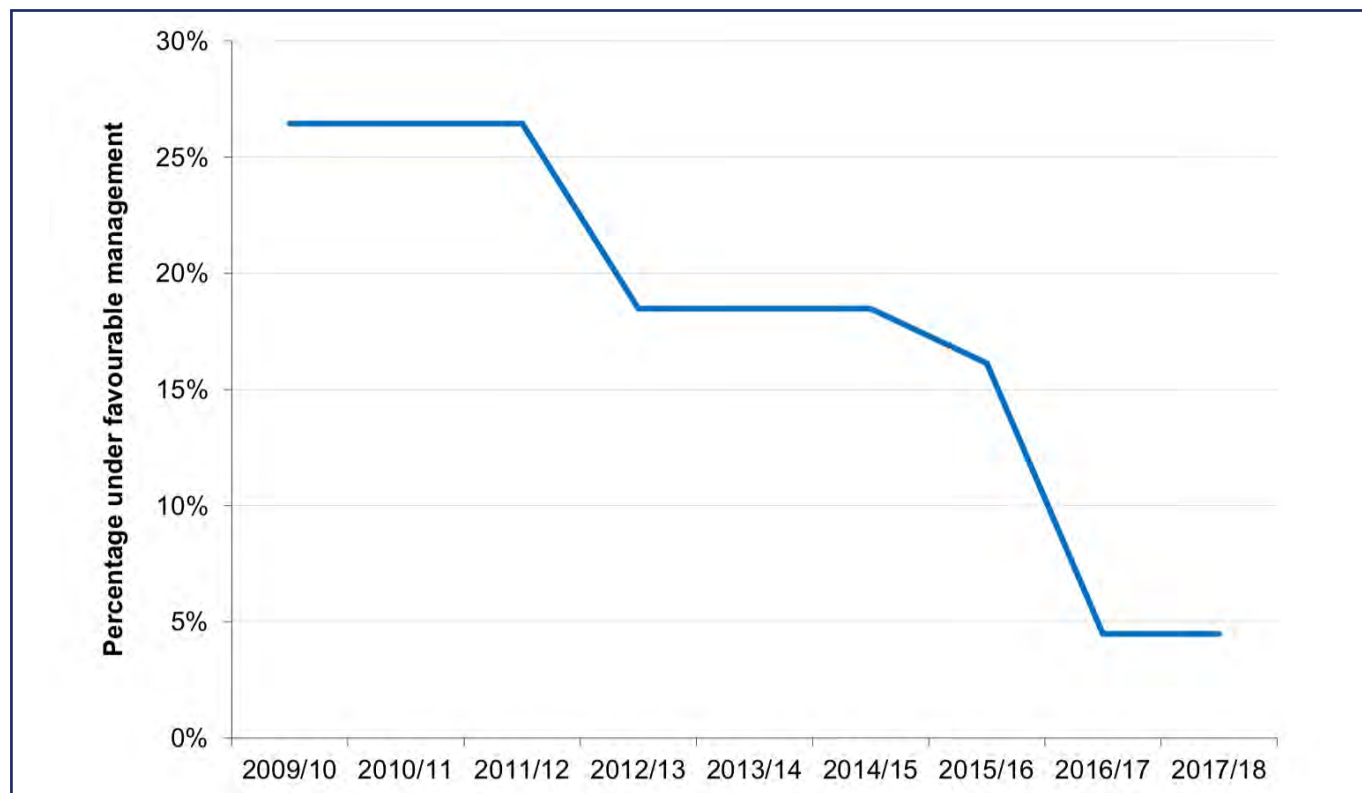
Excessive levels of marine nutrients can lead to a process known as eutrophication. Local effects can include fish kills and the localised smothering of other marine macroalgae and animals.

In Northern Ireland levels of winter DIN have been monitored since 2012. The levels of winter DIN remained relatively stable between 2012 and 2018. In 2018, winter DIN was 0.49 µM less than 2015 levels. DIN is one of the most important elements in determining the status of our coastal and transitional waters (see 'Environmental Quality' figure 14).

There are a number of sources of nutrient enrichment of rivers and marine waters, such as wastewater and septic tanks, but the most significant cause remains the run-off of organic and chemical fertilisers from agricultural land.

**Biodiversity**

**Fig. 7: Biodiversity - % of protected terrestrial area under favourable management**  
(NI Environmental Statistics Report 2019)



**Fig. 8: Biodiversity - % of protected marine area under favourable management**  
(NI Environmental Statistics Report 2019)



Protected areas represent the very best of our natural landscapes, biodiversity and geodiversity, forming the cornerstone of nature conservation by supporting plants, animals and habitats that are rare or unique.

The designation of protected sites is largely complete and so the focus is now on improving their overall condition towards “favourable conservation status” (FCS). FCS is achieved through interventions deemed necessary to support the recovery of sites’ special features.

The total terrestrial protected area increased from 1,384km<sup>2</sup> (2009/10) to 1,489km<sup>2</sup> (2017/18). The proportion of these areas under favourable management however has shown a decreasing trend since 2009/10. In 2017/18 the proportion under favourable management was 0.18% (the same as for the baseline year, 2015/16).

The total marine protected area increased from 269km<sup>2</sup> (2009/10) to 2,566km<sup>2</sup> (2017/18). The proportion of these areas under favourable management however has also shown a decreasing trend since 2009/10. In 2017/18 the proportion under favourable management was 4.48% (11.64 percentage points lower than the baseline year, 2015/16).

The Department has now entered a phase where the necessary management measures will be identified and introduced for both terrestrial and marine protected areas, and the focus between 2018 and 2022 will be on bringing the protected area network into favourable management - via a set of specific management plans. The trend should be improving from 2018 onwards.

## 6. Our approach

Under normal circumstances, at the outset of this project officials would have taken our policy direction from the Minister of Agriculture, Environment and Rural Affairs and, working with a range of internal and external stakeholders, produced specific policy proposals that would then be consulted upon in the traditional manner.

The form and content of any Environment Strategy is a matter for a DAERA Minister and a NI Executive. However, in the current absence of Ministers, we wish to obtain as broad a view as possible on what a future Environment Strategy might seek to address in order to inform an incoming Minister. This is the approach DAERA is taking, researching the available evidence and seeking the views of internal and external stakeholders to assist future Ministers to take the relevant decisions.

The purpose of this document is to give you, the people who will be affected by the decisions taken in the future, an opportunity to express your views on what our environment should look like in the future, what our environmental priorities and objectives should be, and how we should

achieve these. We have made some suggestions regarding potential issues to be addressed to encourage debate but that is all they are, suggestions - nothing is set in stone at this stage.

We have already engaged with a wide range of stakeholders through a preparatory event on 7 May 2019 - a selection of comments/questions raised on the day and responses to group exercises is provided at Annex A for your information - but we want input from the widest possible range of respondents. We look forward to receiving responses from all sectors, age groups, organisations and individuals. Some of these responses will be from experts in their field and while those will be welcomed, we are just as interested to hear ideas, thoughts and opinions from all walks of life. Every response will be carefully considered and fed into the policymaking process.

## 7. Strategy Scope

Given the all-encompassing nature of “the environment”, it is clear that a new Environment Strategy cannot be developed in isolation. Looking at the bigger picture, across the Northern Ireland policy landscape there already exist a number of high-level, Executive-endorsed strategies that affect the environment and/or are influenced by it. Examples include the: Sustainable Development Strategy; Public Health Strategy; draft Industrial Strategy; Economic Strategy; Regional Development Strategy.

Annex B shows illustratively a range of existing strategies that are endorsed by the NI Executive and a range of existing DAERA strategies with the proposed Environment Strategy in between (neither range is exhaustive). The question is should the Environment Strategy sit amongst: the Executive-endorsed strategies; the DAERA strategies; or between these two groups? The environment is so important to our future prosperity and health and wellbeing that it is our view that the new Environment Strategy must sit in that upper tier with at least equivalent status and influence.

Regardless of the agreed status of the Environment Strategy there is a need to ensure that all relevant strategies across the remit of DAERA and other departments are considered to ensure a joined up approach to enhance, for example, the compatibility of future agricultural and environmental policies.

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

Of course, the environment doesn't recognise borders and for that reason much of the legislation, agreements and guiding principles applying to our environment and its protection are established on an EU or international basis. While the precise impact of EU withdrawal on our environmental legislation may not yet be clear, it is anticipated that the UK will continue to deliver against its international agreements, as much of the legislation emanating from the EU is in fact the outworking of commitments to those international agreements, and because the UK Government has committed to enhancing environmental protection, citing the opportunity afforded by the repatriation of substantial environmental policy areas. Linking the Environment Strategy to appropriate international standards, such as the UN Sustainable Development Goals, may also be desirable.

For a high-level environment strategy to be meaningful it is essential that it is ambitious in terms of its breadth and depth. It is as pointless to propose highly ambitious outcomes in a very narrow range of activities as it is to propose unchallenging outcomes over a broad range of topics. The net result in either case is uninspiring and misses the opportunity to address the important issues that will make a significant difference to our economic, social and environmental success in the future. It is our aim, through the new Environment Strategy, to focus on ambitious outcomes for the big environmental issues facing us that will make a difference to the lives and wellbeing of this and future generations.

The Environment Strategy will build on the valuable work that has been, and continues to be, done across a wide range of relevant policy areas. Some of the strategy will be about identifying what we have achieved, where we are now, and what strategic initiatives are already in place and how these can be enhanced through new approaches to the issues we face going forward.

At the very least, the key environmental areas that will be covered will be:

- **Climate Change (mitigation and adaptation)**

Mitigation refers to addressing the root cause of climate change by reducing or preventing greenhouse gas emissions through, for example, using new technology, improving energy efficiency, or modifying business and consumer behaviour.

Adaptation, on the other hand, means anticipating the impacts of climate change and taking appropriate action to:

- (a) prevent or minimise the damage they can cause; or
- (b) take advantage of opportunities that may arise.

Examples include: using water resources more efficiently; building flood defences; and developing climate-resilient grasses and crops.

- **Natural Environment and Landscapes**

The natural environment essentially includes everything that is not man-made, from biodiversity (all living things) to geological features such as mountains, caves and cliffs. It also refers to ecosystems, which can be defined as: *“a community of living organisms in conjunction with the non-living components of their environment, interacting as a system”*. Landscape is an area, perceived by people, whose character is the result of the action and interaction of natural and/or human factors. Every landscape forms the setting for the lives of local people, and the quality of those landscapes can affect everyone’s lives.

- **Resource Efficiency**

Usually defined as: *“using the Earth’s limited resources in a sustainable manner while minimising impacts on the environment”*, there are potentially significant environmental, economic and social benefits to be obtained from following this approach. A key element in efforts to achieve resource efficiency is the appropriate application of the ‘waste hierarchy’, focusing first and foremost on the prevention of waste and only then applying the next best alternatives in order of potential damage to the environment, with the most damaging, disposal, as very much a last resort. Complementing efforts to achieve resource efficiency is the development of a circular economy, to ensure that the value of resources is maintained in the economy for as long as possible and waste is minimised as a result.

- **Marine Environment**

Northern Ireland’s marine area is 6,855km<sup>2</sup> and represents approximately one third of our natural environment. The coast, and the seas around it, include highly productive and biologically diverse ecosystems, with features which serve as critical natural defences against storms, floods and erosion. This area supports tourism, recreation, aquaculture, fisheries, industry, commercial harbours and quays, as well as being used for power generation and the disposal of effluents from waste water treatment. DAERA has consulted on a draft Marine Plan for NI that will seek to provide a framework for the balanced and sustainable development of these activities.

- **Environmental Quality (Air, Water and Neighbourhood)**

Environmental quality can be thought of as a set of properties or characteristics of the environment as they impinge on human beings and other organisms. For the purposes of this exercise, we are talking about a range of specific policy areas, including air, water and neighbourhood environmental quality. Neighbourhood environmental quality includes issues such as litter and dog fouling but also the quality of the built environment - dilapidation and neglect, for example.

- **Fisheries (Inland and Sea) and Aquaculture**

Fisheries is a very broad policy area that includes inland, inshore and sea fishing, along with aquaculture, the farming of aquatic organisms such as fish, crustaceans, molluscs and aquatic plants. Inshore and sea fishing, and aquaculture are largely commercial activities, important to the economy, while inland fishing activities are generally for sport or recreation, but also economically important. DAERA also has an important role in the conservation and protection of fish stocks.

- **Built environment**

The term 'built environment' refers to aspects of our surroundings that are built by humans - i.e. distinguished from the natural environment. It includes not only buildings, but the human-made spaces between buildings, such as parks, and the infrastructure that supports human activity such as transportation networks, utilities networks, flood defences, telecommunications etc. It includes heritage buildings and monuments and encompasses policy areas such as planning, housing and regeneration.

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

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

## 8. Strategic Themes

As previously mentioned, it is intended that the strategy will cover all of the traditional environmental policy areas but we are keen to present them through a number of themes that will properly highlight the importance of the environment, not just in terms of its intrinsic value but also to a wide range of social and economic issues to which it brings significant benefits.

At this stage the Department has developed 4 potential themes, which overlap to some extent:

- **Environmental Engagement;**
- **Environmental Prosperity;**
- **Environmental Efficiency; and**
- **Environmental Quality.**

**Q3: As described below, do you agree that these are appropriate strategic themes for the Environment Strategy?**

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

### **Environmental Engagement -**

We are an integral part of nature, and reliant on nature to sustain life. We can positively impact nature as we engage with it, protecting, maintaining and enhancing a clean and healthy environment as we live, work and play. However we can cause harm to the environment, and this negative engagement is increasingly causing impacts to health, well-being and future sustainability.

Engagement or connection with the environment occurs on a number of levels and we are keen to identify these interactions and analyse how they can be best managed to maximise benefit to the environment, the public and business/industry. Environmental interactions include: how the public connects with the environment; how the public engages with DAERA; the impact of business and industry on the environment; how DAERA engages with business and industry; how we in DAERA work with other departments to support the protection and enhancement of the environment; how the various parts of DAERA work together; and our relationship with district councils. All of these are, of course, two-way engagements.

This theme also encompasses issues such as:

- education;
- general public awareness;
- the use of technology; and
- DAERA's Knowledge Advisory Service.

It is a well-worn cliché that children are our future but it isn't any less true for that. To their great credit, many younger people around the world are leading the way with their understanding of, and desire to protect, the environment. Programmes such as the international Eco-Schools initiative, which is part-funded by the department, have undoubtedly contributed to this positive attitude. 100% of Northern Ireland's primary and secondary level schools participate in this scheme - the first region in the world to achieve this feat. The similar Eco-Campus programme is also now gaining traction at tertiary level, with a growing presence in further and higher education establishments. In developing the Environment Strategy we hope to offer continued support to existing initiatives but also to explore other ways in which environmental issues can be further integrated into the educational system.



However, having a focus on initiatives within the educational system and/or aimed at young people doesn't mean we can ignore those in older generations. It is important to raise awareness of global, national and local environmental issues across all age groups as part of a behavioural science approach to achieving change across all parts of society. It is clear though that more work is needed in this area, both in terms of raising awareness of the relevant issues and identifying what motivates individuals and groups to take care of their environment.

Existing initiatives such as the Live Here, Love Here campaign and Best Kept Awards have played, and continue to play, an important role in engendering a sense of civic pride in communities and modifying attitudes and behaviours towards the environment, particularly at a local level. These and many other initiatives have received significant support from the department through its Environment Fund (and previous schemes), using funds raised through the carrier bag levy to promote and enhance the environment.

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

### **Environmental Prosperity -**

There is ample research evidence that most people see the natural environment as having intrinsic value - i.e. it has value in itself as opposed to what it can provide in terms of resources etc. However, research also shows that this intrinsic value alone is not sufficient to stop environmental damage being caused by human hands. Often, a much more effective argument for environmental protection and enhancement is the instrumental or economic value of the environment - i.e. what it can provide or what further value can be gained from it.

A clean and healthy environment is hugely important to the economy in many ways - for example:

- one of our largest industries, tourism, generated a spend of £939m in the local economy in 2017-18 and supports around 60,000 full and part-time jobs<sup>2</sup>. Not all of that spend can be attributed directly to the environment but it is a major factor in people deciding to spend time here, whether they are from here, the Republic of Ireland, Britain or further afield;
- the agri-food sector is of huge importance to the economy, far more so than in other parts of the UK, with agriculture contributing £644m to Gross Value Added figures in 2017 and food and drinks processing £827m<sup>3</sup>. 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 (both positively and negatively). The challenge, of course, is to ensure that both thrive without detriment to the other. The future strategic direction of agricultural and fisheries policy will be a significant factor to be taken into account when developing the Environment Strategy, and vice versa;

<sup>2</sup> [Northern Ireland Tourism Statistics April 2017 - March 2018 \(NISRA\)](#)

<sup>3</sup> [Northern Ireland Agri-Food Sector: Key Statistics July 2018 \(DAERA\)](#)

- the Green Economy is a term which means different things to different people but here we are talking about the economic opportunities afforded by the environment and the need to address environmental challenges, often in innovative ways. Renewable energy, eco-tourism, energy efficiency, recycling etc. are just some of the areas creating opportunities and challenges as we seek to improve our environmental performance and sustainability;
- those choosing to pursue leisure activities on land, water or, indeed, in the air are heavily influenced by the state of our environment. These include such activities as: angling; cycling; walking; climbing; watersports; paragliding and many more. There are direct economic benefits from such activities (although there are potential costs too, in terms of environmental damage etc.) but also indirect economic benefits through, for example, increased levels of health and wellbeing, potentially leading to reduced healthcare costs.

Much of this proposed theme can be captured under the umbrella of ecosystem services, where the ecosystem provides a benefit (or benefits) just by existing in a clean and healthy state. In addition to those already mentioned above, other common examples of these ecosystem services include: carbon capture in soils and trees; healthy fish stocks; water filtration; and agricultural activities such as pollination and natural pest control. Nature is very good at providing these services but many ecosystems are incredibly finely balanced and, as a result, can be very easily disrupted.

Associated with ecosystem services is the concept of “natural capital”, our natural assets including forests, rivers, land, air, minerals and oceans. The value of our natural capital has traditionally been understated but the idea of placing a more accurate economic value on our natural resources is gaining traction and now features prominently in the UK Environmental Accounts although it is not yet possible to easily disaggregate the relevant local figures. While progress has been made, integrating a natural capital approach into the policy making process is still very much in its infancy and there remains a need to improve the available data. This is an area where we might harness the growing power of Artificial Intelligence (AI), opening up sustainable economic and environmental development opportunities built on a solid knowledge foundation.

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

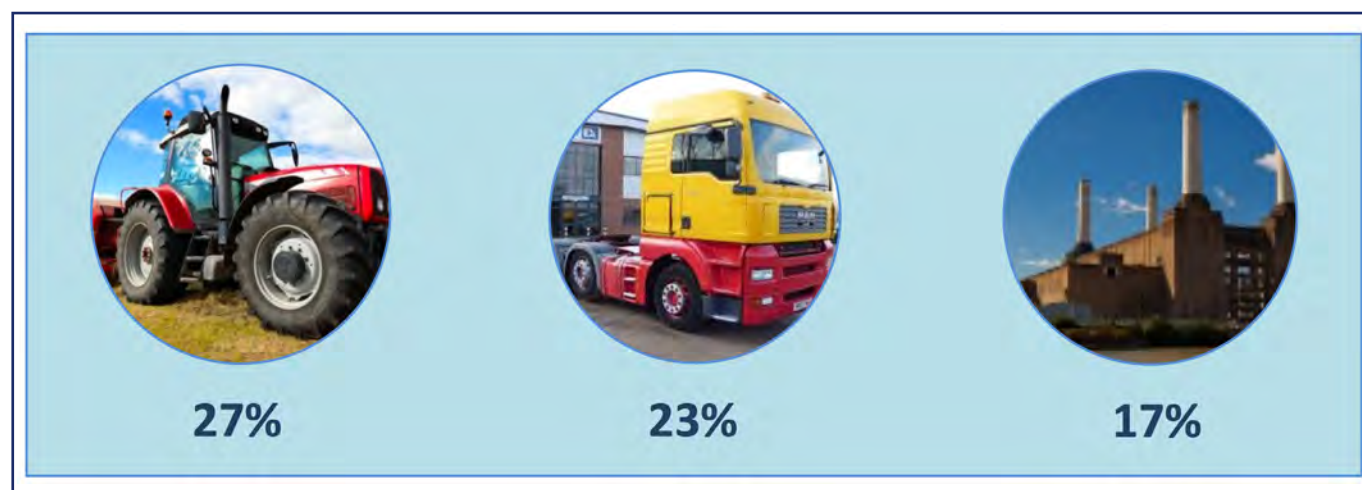
## Environmental Efficiency -

There are a number of closely related 'big picture' issues to be considered under this theme. These include:

**Climate Change** - there is significant acceptance of the desirability of shifting towards a low-carbon economy but perhaps less consensus about how we should go about it.

Climate change is, of course, a global issue, requiring action at a number of levels. The Paris Agreement, signed by 195 countries and the EU in December 2015, required signatories to reduce GHG emissions to limit global temperature rise to 2°C and pursue efforts towards a limit of 1.5°C. The European Union (EU) has a target of reducing GHG emissions from 1990 levels by 20% by 2020 and 40% by 2030. The Climate Change Act 2008 established a target of reducing UK GHG emissions by 80% from 1990 levels by 2050 and locally, the NI Executive, in its PfG (2011-15), has a target of continuing to work towards a GHG emissions reduction of at least 35% on 1990 levels by 2025.

There are particular challenges facing us in this regard as a result of the make-up of our economy, our geographical position and our reliance on fossil fuels, creating pressures from the agricultural, transport and energy supply sectors in particular. This is clearly reflected in the relative reductions in greenhouse gas emissions across the UK, where we fall well behind England and Scotland but compare with Wales.



**Fig. 9: Main sectoral contributors to NI Greenhouse Gas Emissions** (Northern Ireland Greenhouse Gas Emissions 2017, DAERA)

Although not formally part of the recent UK Committee on Climate Change report, *Net Zero: The UK's contribution to stopping global warming*<sup>4</sup>, Northern Ireland will have a contribution to make to overall UK targets. Importantly, Northern Ireland will also have a key leadership role in demonstrating to the rest of the world what is possible.

<sup>4</sup> [Net Zero: The UK's contribution to stopping global warming \(CCC, 2019\)](#)

Of course, climate change is not just about the mitigation of greenhouse gas emissions. There is also a need to address the issue of adapting to the impacts of climate change and, to this end, DAERA is currently developing the 2nd Northern Ireland Climate Change Adaptation Programme, setting out its strategic direction and objectives and establishing a range of adaptation actions for the next five years.

**Resource Efficiency** - is commonly defined as: *“Using the Earth’s limited resources in a sustainable manner while minimising impacts on the environment”*. This is something that applies across all sectors and touches on the remits of other departments - energy, planning, built environment etc.

We depend on natural resources, such as metals, minerals, fuel, water, land, clean air and biodiversity to survive. All of these things, and more, keep our economy functioning. Increasing resource efficiency brings economic opportunities and boosts competitiveness, thereby helping to secure growth and jobs. Continuing our current pattern of resource use is not an option<sup>5</sup> and maintaining a focus on the Waste Hierarchy as a key policy driver is essential to maintain progress on our journey towards minimising waste.

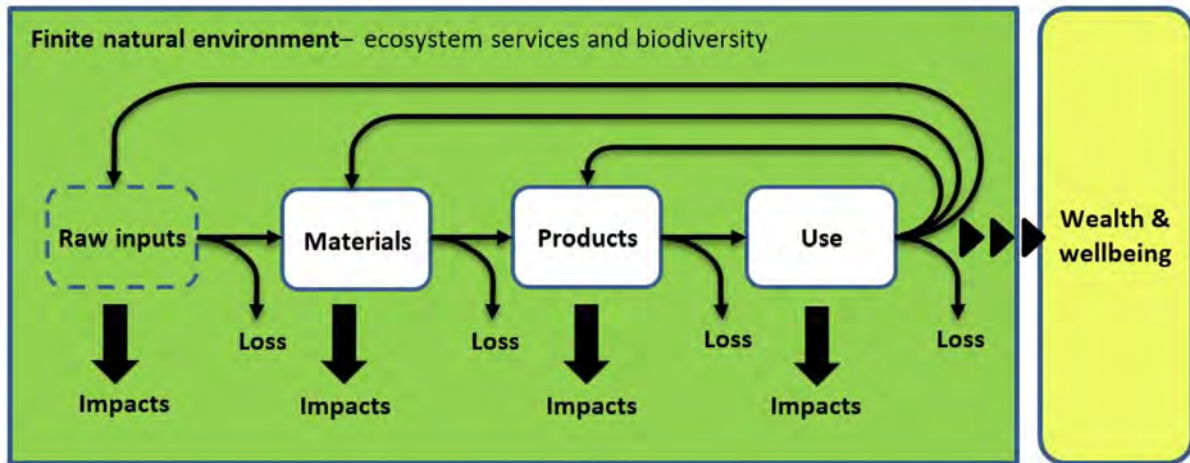


**Fig. 10: The Waste Hierarchy** (NI Waste Management Strategy 2013)

We need to continue to seek ways to improve management of resource stocks, reduce inputs, improve logistics, optimise production processes, change consumption patterns, and minimise waste throughout what is often referred to as the “value chain”.

<sup>5</sup> [Delivering Resource Efficiency - Northern Ireland Waste Management Strategy](#)

**Circular Economy** - supporting the shift to a low carbon economy and improved resource efficiency is the development of what is described in the EU action plan for the circular economy<sup>6</sup> as a system “...where the value of products, materials, and resources is maintained in the economy for as long as possible, and the generation of waste is minimised...”.



**Fig. 11: Resource efficiency and the circular economy** (Van Ewijk 2018)

Figure 11, above, contains six important elements that are common to both resource efficiency and the circular economy.

- *Raw inputs* into the economy. These usually include raw materials and may also include land and water.
- *Wealth or wellbeing* are the results of the exploitation of natural resources, often measured through economic output metrics.
- *Environmental impacts* range from toxic air emissions and water pollution to forest degradation and climate change.
- *Finite natural environment* describes ecosystems and their limited capacity to deliver their services under increasing pressures.
- *Inefficiencies (losses)* occur between raw inputs and economic outputs across the value chain and lead to waste.
- *Loops* between inputs and outputs reflect circulation of materials back into the value chain or, for some organic materials, back to their origin instead of being lost as waste<sup>7</sup>.

Although the concepts of resource efficiency and the circular economy are in many ways similar they are not the same and, like all concepts are open to a degree of interpretation. There are very real challenges for policymakers with regard to unintended consequences and the potential trade-off between environmental, social and economic outcomes.

<sup>6</sup> [Closing the Loop - An EU action plan for the circular economy](#)

<sup>7</sup> Van Ewijk, S. 2018. Resource efficiency and the circular economy: Concepts, economic benefits, barriers, and policies



***Sustainable Production and Consumption*** can be defined as: production and use of products and services in a manner that is socially beneficial, economically viable and environmentally benign over their whole life cycle.

This aligns with the UN Sustainable Development Goals published in September 2015<sup>8</sup>, particularly Goal 12: *Ensure sustainable consumption and production patterns*. Although the 17 UN Sustainable Development Goals and their 169 associated targets are a global initiative, there is a recognition that they need to be progressed at a local level, generally referred to as “localising the SDGs”.

This goal is very much at the heart of the **Environmental Efficiency** theme and what we, in DAERA, are striving to achieve through policy interventions in respect of: resource efficiency; the circular economy; producer responsibility; food waste; waste management; climate action; agricultural subsidies; recycling; efficient farming; fisheries; procurement etc. but of course other departments have their parts to play too.

**Q6: Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?**

## **Environmental Quality -**

This theme represents probably the most tangible aspects of the environment for most people, particularly those that can be measured and compared. While many aspects of environmental quality have a long term or cumulative effect, others have a more immediate impact on health and wellbeing, environmental justice and economic prosperity. That does not, however, mean that they are always easily visible or simple to deal with.

DAERA's annual Environmental Statistics Report<sup>9</sup> provides a wealth of data across a range of policy areas, under the headings: demographics and public opinion; air and climate; water; marine; land; biodiversity; built heritage; and waste. There is a vast array of data contained within this report but the department recognises that additional metrics may need to be developed to appropriately monitor environmental performance in light of the final content of the Environment Strategy.

Some of the specific environmental quality issues that we would expect the strategy to cover include:

***Air Quality*** - the main air quality issues prevalent are:

- Nitrogen Dioxide (NO<sub>2</sub>), which is produced as a result of road traffic and other combustion processes, and is known to irritate lungs and lower resistance to respiratory infections.

<sup>8</sup> [Resolution 70/1 of the United Nations General Assembly: Transforming our World: the 2030 Agenda for Sustainable Development](#)

<sup>9</sup> [Northern Ireland Environmental Statistics Report 2019 \(DAERA\)](#)



- Particulate Matter (e.g. PM<sub>10</sub>), again largely produced by road transport and other combustion processes, these fine particles can be carried into the lungs where they can cause inflammation and may also carry surface-absorbed carcinogenic compounds.
- Ammonia, which arises mainly from agricultural practices (although other sources include transport, commercial and domestic combustion and industrial processes), as an air pollutant impacts on human health mainly by contributing to the formation of particulate matter but also significantly affects biodiversity through deposition.

The Department aims to issue a draft Clean Air Strategy for public discussion later this year. The draft Strategy will examine the causes and impacts of air pollution in NI and put forward policy proposals for consideration by stakeholders. This will help to inform the Department's development of air quality policy going forward.

**Environmental Noise** - one of the environmental issues most commonly complained about, local statistics are published annually under the headings of: domestic; commercial and leisure; industrial; noise in the street; construction, demolition or road works; and transport. In 2016/17 over 12,000 separate complaints were made across these categories, with around 80% of these relating to domestic noise.

**Biodiversity** - this includes the full range of life on Earth - all species of plants and animals and the complex ecosystems of which they are part.

*The benefits that we derive from biodiversity are critical to our survival and cannot be over-stated. We depend on biodiversity for the very basics of life - clean air, water, shelter and food, which together support our health and well-being. A healthy natural environment with a wide range of biodiversity is the source of a vast array of products we use on a daily basis and provides employment to those involved in their development and production. People are part of that system, benefiting from it as well as influencing how it functions.<sup>10</sup>*

The range of pressures negatively affecting biodiversity is wide and includes: change and intensification in land use resulting in habitat loss, fragmentation and degradation; land, woodland and water management practices, such as over/under grazing and land drainage; air and water pollution, such as nutrient enrichment; disturbance; invasive species; the growing impacts of climate change; development; and lack of recognition of the value of nature, all of which are the products of human actions (or inaction).

Although the focus of biodiversity actions is often on protected species and habitats, it is not just the rare or endangered that need to be protected and enhanced - it's all of the natural world, from the commonplace to the critically endangered. The designation and management of

<sup>10</sup> [Valuing Nature: A Biodiversity Strategy for Northern Ireland to 2020](#)

protected sites is a key tool in our efforts to halt biodiversity loss on land and sea but so too are broader initiatives in respect of the natural environment.

**Land Quality** - Land use, for agriculture, industry, leisure, transport and residential purposes is central to each of our daily lives. In a relatively small area with many competing priorities, great care must be taken to ensure we get the balance right, allowing our people to prosper socially and economically, while at the same time preserving and enhancing our environment. As previously stated, these are not separate issues - they are intertwined and interdependent.

How we use our land can have a significant impact on greenhouse gas emissions but also provides us with the natural means to store carbon through, for example, healthy peatlands and forestry.

Land quality doesn't just suffer through legitimate uses. There are, unfortunately, too many who still see our beautiful land as simply an opportunity for economic gain, through fly-tipping, illegal landfilling, fuel laundering and other nefarious polluting activities. High profile, large scale cases like the illegal dumping at Mobuoy make the headlines but there are many other smaller scale incidents that have significant negative impacts on the environment and local communities that are not so widely reported.

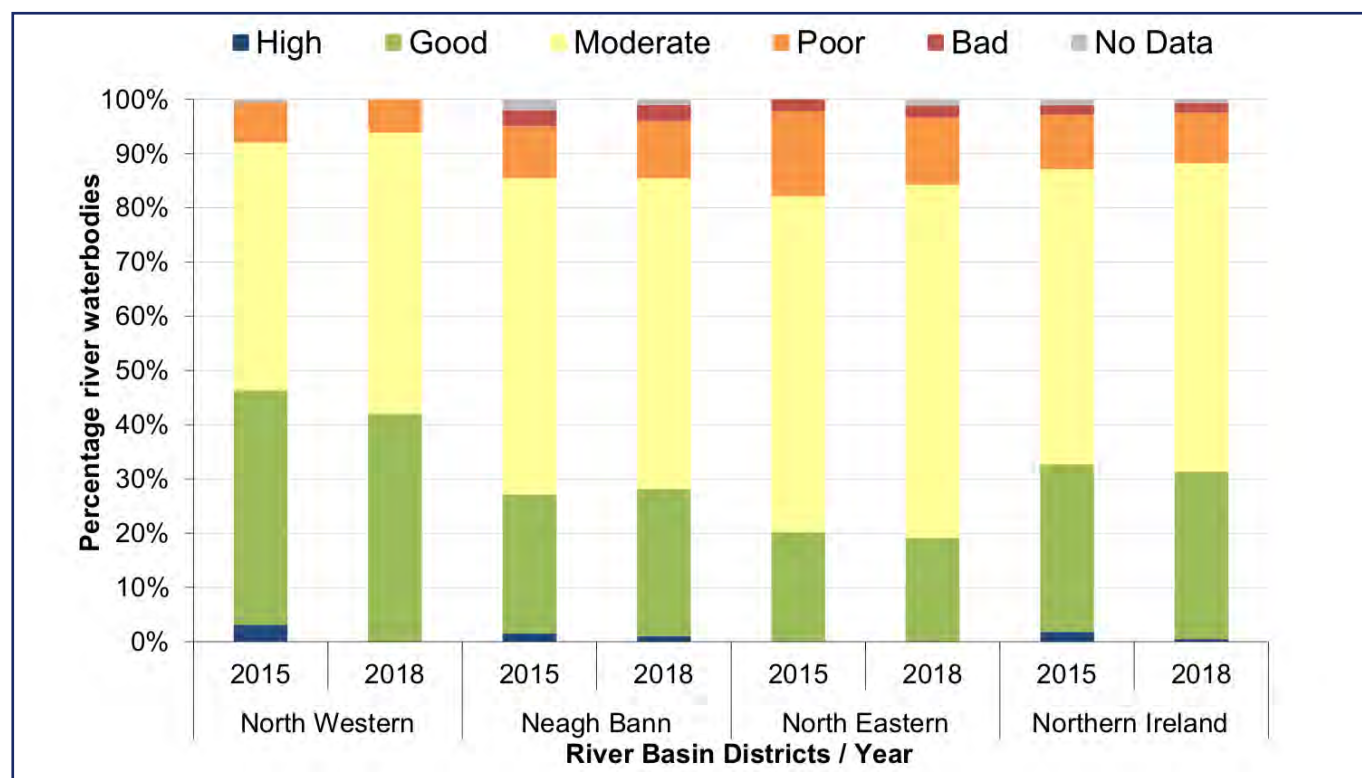
**Water Quality** - fresh water is essential for all life - humans, animals, and plant life cannot survive without it. We use water to drink, prepare food, help with sanitation, and for agricultural and industrial purposes. However, water is a finite natural resource that needs to be respected and used efficiently, with a minimum of waste.

The aquatic environment, freshwater and marine, are key ecosystems in themselves and are also a hugely important and valuable resource for recreation, leisure and tourism as well as providing an important source of food through fishing and aquaculture activities.

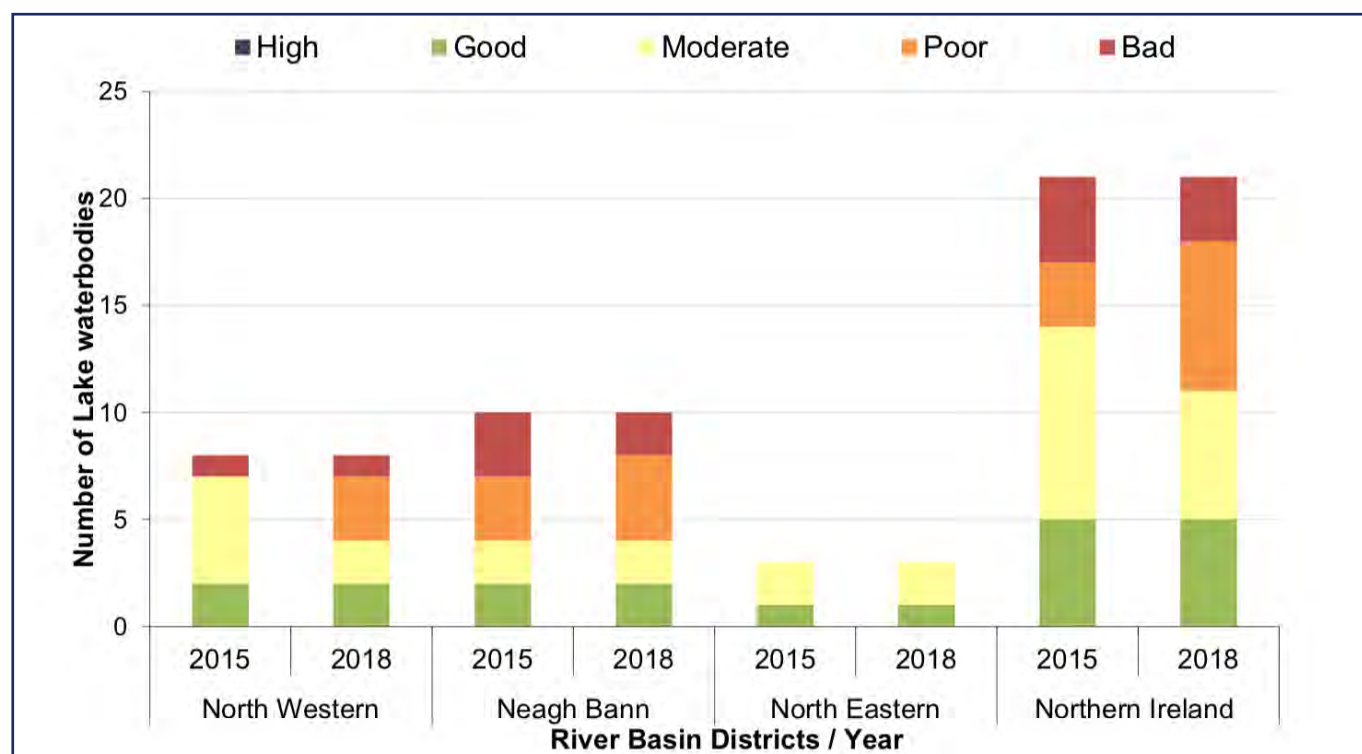
The key legislative instruments in this area (although there are others) are the Water Framework Directive (WFD) and the Marine Strategy Framework Directive (MSFD), which introduced a holistic approach to the management of water quality, and require the protection and improvement of all aspects of the water environment including rivers, lakes, estuaries, marine and coastal waters and groundwater. In basic terms the Directives require EU Member States to try to ensure that all inland and coastal waters reach at least 'good status' and our seas meet 'good environmental status'.

The most significant water quality issue militating against achievement of these requirements at the moment is nutrient enrichment, the main cause of which is run-off from agricultural land. As the graphics on page 27<sup>11</sup> show, significant progress is required if we are to achieve 'good' / 'good environmental' status as required by the WFD":

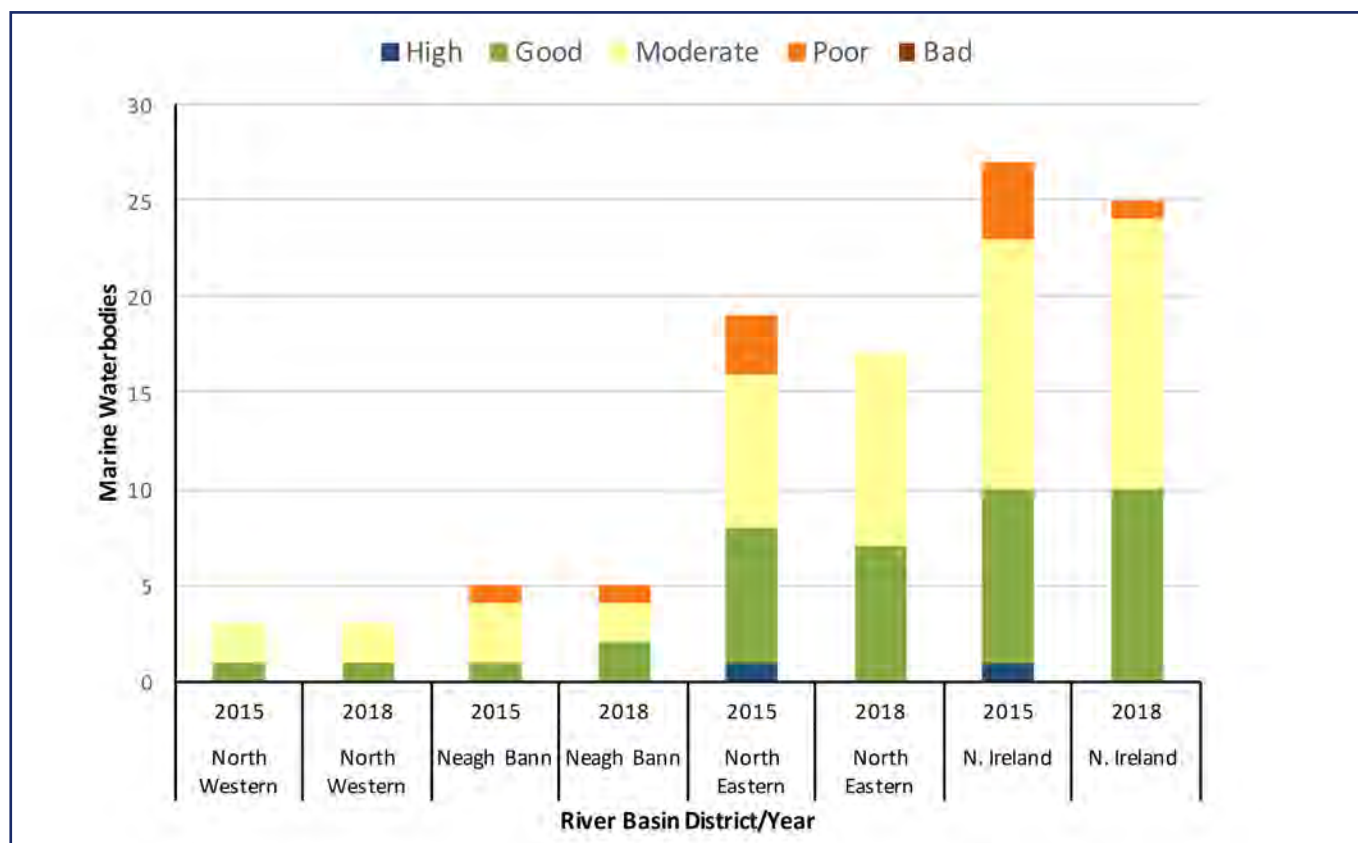
<sup>11</sup> [Northern Ireland Environmental Statistics Report 2019 \(DAERA\)](#)



**Fig. 12: Rivers - Water Framework Directive (WFD) overall classification (% river waterbodies), 2015 and 2018**



**Fig. 13: Lake Water Framework Directive status, 2015 and 2018**



**Fig. 14: Marine - Water Framework Directive overall status in transitional and coastal waters (number of marine water bodies), 2015 and 2018**

**Neighbourhood Quality** - covers a wide range of local environmental issues, including: litter; dog-fouling; environmental noise; dilapidation (including our historic built environment); graffiti; and fly-posting, which can contribute to a loss of amenity for local residents and visitors, and a range of social and economic problems, such as increased anti-social behaviour, reduced trade and tourism, and health issues.

For example, dilapidated or unsightly buildings or structures can ruin the general appearance of the area in which they are located. A business whose property adjoins such a building can suffer a loss of trade due to the deterioration of the amenity of the area. Property owners can also suffer due to decreasing property values and mental and physical health effects. Dilapidated buildings also have consequences in terms of people's perceptions of an area. The maintenance of attractive and successful places in which people are happy to live, work and visit is therefore very important and should help to move Northern Ireland towards greater economic, social and environmental prosperity.

Litter (much of it single-use plastic) and dog-fouling are often the local environmental quality issues most visible to members of the public. However, these are not simply aesthetic issues - there are obvious human health implications from dog fouling and, to a lesser extent from litter pollution (e.g. increased vermin activity). However, litter pollution also impacts negatively on the natural





These local environmental quality issues are largely regulated and enforced by our district councils, with the support of DAERA, other departments and a range of partner organisations. While traditional regulation and enforcement is undoubtedly important, we, and the local councils who are in the frontline of efforts to improve local environmental quality, recognise the fact that behaviour change requires a range of interventions that include “softer” approaches, including education and awareness-raising.

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

## 9. Environmental Governance

Running through all of these themes is the concept of environmental governance - in other words, how we manage protection and enhancement of the environment.

This is an issue that has generated a long-running debate here, which has focused to a large extent on whether we should have an independent environmental protection agency. While there is support for an independent agency, responses to the most recent discussion document on environmental governance<sup>14</sup> indicated a widely held view amongst stakeholders that the focus should be on environmental outcomes rather than simply changing delivery structures. It follows that the development of an environment strategy is one of the ways in which we are seeking to achieve this. There are many strongly held views on the pros and cons of such a step and it may be that the issue of governance structures will need to be considered again once the potential impacts of Brexit become clearer.

However, the concept of environmental governance encompasses a great deal more than structural issues and includes:

- a strategic vision for the environment;
- the development of appropriate policy;
- implementation of that policy;
- better regulation;
- personnel issues (training, development, motivation etc.);
- the environmental justice agenda;
- knowledge management and communication.

<sup>14</sup> [Discussion Document on Environmental Governance in Northern Ireland - Synopsis of Responses](#)



The Department has made progress in several of these areas, for example:

- (a) ***Regulatory Transformation Programme***, the overall vision of which is to deliver a 21st century regulatory system that is risk-based, will deliver better environmental outcomes, will continue to deliver more efficient and effective customer service, and will help responsible businesses and citizens operate effectively within environmental limits;
- b) ***Environmental Better Regulation Act***, which enables the Department to make regulations relating to the protection and improvement of the environment with the secondary objective of reducing the regulatory burden on those carrying out regulated activities (where that is consistent with protecting and improving the environment), and streamlining and consolidation of the powers of entry and associated powers that are contained within numerous pieces of environmental legislation; and
- (c) ***DAERA Knowledge Advisory Service (KAS)***, which brought together the existing advisory functions provided by the College of Agriculture, Food and Rural Enterprise (CAFRE) and the Department's Countryside Management Unit to support the holistic development of farm and food businesses, where economic and environmental performance are inextricably linked.

Brexit has also brought other governance issues to the fore, such as the potential need for:

- (a) enhanced North/South environmental protection arrangements; and
- (b) some form of independent environmental oversight body when we leave the EU. On the latter, the UK Government plans to establish an Office for Environmental Protection (OEP), which is intended to have statutory roles in respect of monitoring, reporting and adjudicating on the environmental performance of public bodies. The proposed OEP will be separate from, and perform a different role than, the Environment Agency in England. Should a future Minister decide that the functions of the OEP should extend to Northern Ireland, it would not replace any of NIEA's duties or responsibilities.

Of particular relevance to the Environment Strategy are the proposals that:

- (a) the OEP's duties should include monitoring and reporting on the UK Government's progress against its 25-year plan for the environment; and
- (b) that the UK Government's 25 year plan for the environment should be given a statutory footing.

In both cases it will be for a future DAERA Minister to decide if similar provisions should apply here.

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

## 10. Draft Outcomes

We are keen to ensure that the Environment Strategy should focus firmly on the environmental outcomes that we want, and need, to achieve. As previously stated, it is not our intention to be in any way prescriptive about what these outcomes should be but initial discussions with internal and external stakeholders suggested that it would be helpful to provide some sort of indication of what these might look like.

We have chosen 6 potential draft outcomes which are intended to cover a range of key high-level environmental issues and these are presented in graphic format in Annex C, along with relevant Programme for Government outcomes and the department's vision of: ***A living, working, active landscape valued by everyone***. We don't have to have 6 outcomes - it can be more, it can be less. What is important is that we have a clear view about what these outcomes should be, and why.

The 6 suggested draft outcomes are:

- We achieve zero waste and a well-developed circular economy;
- Everyone can access and is connected to a healthy environment;
- We have reduced greenhouse gas emissions and improved climate resilience;
- Biodiversity loss halted, ecosystems in a healthy state, and well managed landscapes;
- We achieve sustainable consumption and production on land and sea;
- We have excellent air, water, land and neighbourhood quality.

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

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

## 11. What's the Big Idea?

An all-encompassing Environment Strategy for Northern Ireland is a big deal - it will potentially sit alongside existing high-level strategies endorsed by the NI Executive and will set the tone for environmental protection and improvement for decades to come.

As preparations continue to leave the EU, the development of this Strategy provides us all with the opportunity to shape environmental engagement, prosperity, efficiency and quality for our future generations.

Big strategies need big ideas and this document is your opportunity to suggest what those big ideas should be. We are placing no restrictions on those ideas at this stage - it might be that not all of them will be feasible but we are committed to considering them all in the context of an open and inclusive discussion on the future of our environment.

All of the inputs we receive will be carefully considered and analysed and developed into firm policy proposals to be consulted on under the direction of a future Minister.

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

**Q11: Do you have any other comments or contributions?**

## 12. How to Respond

This engagement exercise uses the Citizen Space Hub, accessible via the relevant page on the [DAERA website](#), as the primary means of response, in order to make it as accessible as possible.

However, you may download a response template from the DAERA consultation website and reply by e-mail or hard copy respectively to:

[esni@daera-ni.gov.uk](mailto:esni@daera-ni.gov.uk)

or

Neighbourhood Environment Quality Branch  
Department of Agriculture, Environment and Rural Affairs  
Regulatory and Natural Resources Policy Division  
2nd Floor, Klondyke Building  
1 Cromac Avenue  
Gasworks Business Park  
Belfast  
BT7 2JA

Early responses are encouraged but all responses should arrive no later than **5pm** on **23 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. If you require any further information, contact Lisa Frazer on 028 9056 9497.

# Freedom of Information Act 2000

## - Confidentiality of Consultations

The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can refuse to disclose information only in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

The Freedom of Information Act 2000 gives the public a right of access to any information held by a public authority (the Department in this case). This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity, should be made public or treated as confidential.

This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances.

The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- the Department should only accept information from third parties in confidence if it is necessary to obtain that information in connection with the exercise of any of the Department's functions and it would not otherwise be provided;
- the Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature;
- acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

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

Tel: (028) 9027 8757

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

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

## Annex A - Comments and feedback from stakeholder event on 7 May 2019

Will an independent environment agency be needed to ensure delivery and to bring us up to date with other countries?

How do we move to become food secure as an island rather than our current insecurity?

Why has there been so little local work identifying and assessing our local ecosystems services. A programme of research developing examples across a number of farmed landscapes to assess public good and benefits should be delivered.

How will the strategy seek to balance the impacts of big manufacturers on the environment alongside the focus on agri-food production?

How can we meet Call4Nature call "... to encourage the transition to sustainable agricultural practices?"

Why has the Countryside Survey, a series of repeat eco land use surveys for Northern Ireland going back to the 1980s not been repeated? Excellent baseline data allowing for Gov. to assess environmental change following/reflecting policy change wasted.

Don't we just need to stop tiptoeing around the core issues and mandate ways of living and working that everyone now knows are essential to ensure a sustainable future - from building control standards for zero carbon builds to targets for renewables?

EFS funding helps in high nature value farming areas. Could future schemes consider a package for supporting the landscape? Delivering landscape character gains.

Will new environmental performance standards for the built environment be included in the strategy? This will be essential.

How do we ensure the environment can effectively compete with education and health for investment?

Will a behaviour insights /social science team be a gold investment?...to help target messaging, feedback from communities etc.

We need to sell the combined economic, social and environmental benefits of new sustainable ways of living - and be smarter at facilitating the transition by stakeholder groups.

The UK is set to miss its target for Good Environmental Status for the seas by 2020 (MSDF). More of the same will only deliver the same result. How will the new strategy reverse this trend for the marine?

Will there be enough funding to gather the evidence necessary to underpin the development of sound environmental strategies and to monitor the outcomes in a robust way? Research budgets have been slashed - an evidence programme is essential.



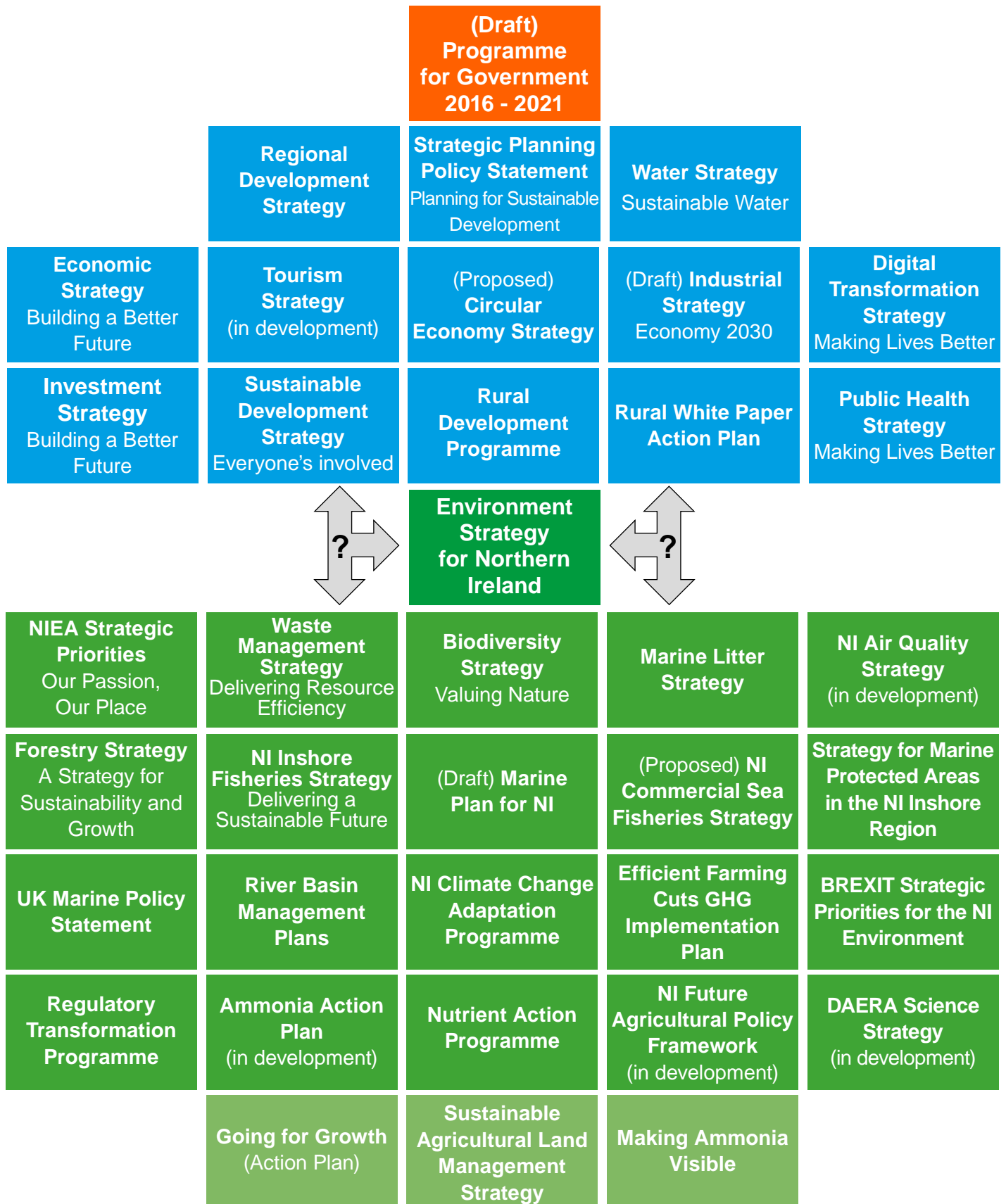
## How do we improve our living, working, active landscape?

- Clear policy direction with clear objectives, targets and standards and transition funding for change process.
- Need to set out problems and solutions. Propositions for solutions.
- Managed access to the land and sea environment.
- A land use and marine integrated strategy.
- Holistic approach to environmental Issues.
- Measurable and legislative long term targets.
- Empowering people to make individual changes.
- Subsidies.
- More sustainable agricultural practices using resources required.
- Partnership working opportunities between multiple stakeholders across shared interests in particular natural assets.
- Go for top 5 - 10 hitters - 80:20 principle.
- GDP traditional measures of wealth generation and job creation lead. Wellbeing and environment measures required to encourage new thinking.

## What are the main obstacles & how do we overcome them?

- Current political understanding of environment.
- Capacity issue.
- Need level playing field.
- No Assembly.
- Weak environmental governance.
- Brexit uncertainty.
- Lack of/prioritisation of resources.
- Focused on growth rather than sustainability.
- The want to change and the opportunity for making those changes.
- More support to local government in terms of environmental information.
- Behavioural change across the board.
- Business reflects consumer behaviour.

# Annex B - Other strategies relevant to a possible Environment Strategy



## Annex C - PfG Outcomes mapped against possible Environment Strategy themes/outcomes and DAERA vision



Neighbourhood Environment Quality Branch  
Department of Agriculture, Environment and Rural Affairs  
Regulatory and Natural Resources Policy Division  
2nd Floor, Klondyke Building  
1 Cromac Avenue  
Gasworks Business Park  
Belfast  
BT7 2JA

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

[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)



**INVESTORS  
IN PEOPLE**

# Environment Strategy for Northern Ireland

## Public Discussion Document

### Stakeholder Response Template



September 2019

*A living, working, active landscape valued by everyone.*



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

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**INVESTORS  
IN PEOPLE**



## 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](mailto:esni@daera-ni.gov.uk)

*or*

Neighbourhood Environment Quality Branch  
Department of Agriculture, Environment and Rural Affairs  
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## **Freedom of Information Act 2000 – Confidentiality of Consultations**

The Department will publish a summary of responses following completion of the consultation process. Your response, and all other responses to the consultation, may be disclosed on request. The Department can refuse to disclose information only in exceptional circumstances. Before you submit your response, please read the paragraphs below on the confidentiality of consultations and they will give you guidance on the legal position about any information given by you in response to this consultation.

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Tel: (028) 9027 8757

Email: [ni@ico.org.uk](mailto:ni@ico.org.uk)

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

## ABOUT YOU

Name (required)

Andrew Cassells

E-mail address (if responding electronically)

andrew.cassells@midulstercouncil.org

Address (if responding by post)

Council Offices  
50 Ballyronan Road  
Magherafelt  
BT45 6EN

Organisation (if applicable)

Mid Ulster District Council

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?**

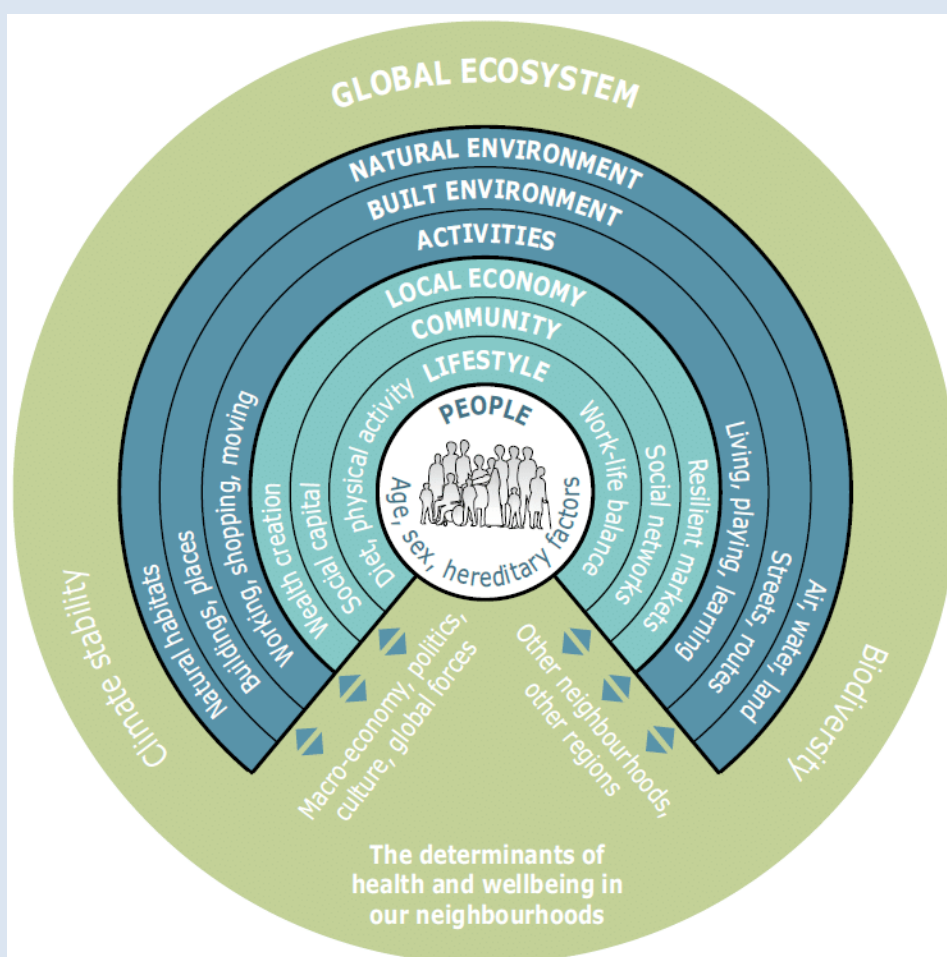
Yes ☒

No ☐

### Comments

Mid Ulster District Council (MUDC) believes that the importance of the Environment Strategy should be at the very least, on par with other Executive endorsed Strategies.

The importance of the environment is best summarized in the diagram below entitled *The Determinants of health and well-being* and is we believe, the context upon which the entire proposed Environment Strategy should be based.



Source: Barton and Grant, University of the West of England, 2006 (Origins in the *Bruntland Report* and in the work being undertaken by the World Health Organisation).

Our environment, which is essential to future prosperity and well-being, has never been under more pressure: biodiversity is in decline, air and water quality remains poor and there is a global climate emergency which is impacting upon all areas of life.

Effective delivery of an ambitious long-term Environment Strategy will help reverse the decline and then, critically, should set Northern Ireland on a new path of renewal and environmental regeneration.

Before commenting further on the content of this Discussion Document, Mid Ulster District Council believes that any future Environment Strategy for Northern Ireland must be based on the following principles. The Strategy must:

- Have statutory footing and binding targets that are clear, measurable, 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.
- 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.
- 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.

In addition, we believe it is fundamental to the future of Northern Ireland that:

- An Environment Bill for Northern Ireland is enacted to give the Environment Strategy a binding, legal footing. 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. It could be argued for example that if our Sustainable Development Strategy had been backed up by legislation, our environment would not be in as bad condition. Without legislation the state of our environment will continue to diminish.
- An Independent Environmental Protection Agency (EPA) is established. Northern Ireland remains the only part of these islands without an EPA. We need an EPA to ensure independent and robust monitoring and appropriate mechanisms to hold government to account.

**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?

Review of Planning legislation and in particular 'Permitted Development Rights' and retrospective planning permission. Government needs to tackle the issue of unintentional or deliberate misuse of permitted development rights in the countryside. Clarification needs to be provided as to when the use of PDR is allowed and when a planning application is required. If the issue of PDR continues to be interpreted incorrectly, consideration should be given to changing what is currently allowed. Government also needs to tackle the issue of development without planning permission and the extremely high success level of retrospective permission.

Under Built Environment there is reference to 'heritage buildings and monuments'. Given the nature of the NI landscape and the historical intertwining of natural and historic environment, there should be more attention on the historic environment including archaeology. For this Strategy to succeed it requires a partnership approach across Government, and is particularly relevant to the Historic Environment Division.

## Other Comments

While we agree with the broad environmental areas listed, we would like to make the following additional comments:

- We agree with the assertion that environmental issues do not respect borders and believe that the island of Ireland and its surrounding seas represent a single biogeographic unit with shared land and sea borders. Therefore to effectively address these issues we must do so on an all-island basis which will require on-going and close cross-border cooperation at a departmental, local authority and community level.
- We note that the sentence on P15 stating *'Linking the Environment Strategy to appropriate international standards, such as the UN Sustainable Development Goals, may also be desirable'*. For Mid Ulster District Council, the linking of the Strategy to the SDGs should be mandatory not optional. The UK government has signed up to delivering the SDGs and Northern Ireland is required to contribute to the UK reporting process. As we believe all future NI Departmental Strategies and Policies (including Programmes for Government) must help deliver on our commitment to implement the SDGs, a SDG Implementation plan for NI with specific indicators must be developed. By using the SDG model, it should be easier to progress/implement the Environment Strategy in the absence of a NI Executive, as it does not require a new approach/departure from previously agreed Government policy. Also, if framed around the SDGs, the Environment strategy could be used as an SDG reporting mechanism.
- While agreeing with the statement that *'For a high-level environment strategy to be meaningful it is essential that it is ambitious in terms of its breadth and depth'* We would argue however that for the Strategy to be meaningful it must have:
  - **Legally-binding environmental objectives** for wildlife, water, air and natural assets, each with a delivery strategy, timeline and milestones;
  - **Green investment** ensuring public and private money supports greener towns, countryside and seas;



- **Accountability across government and the private sector** applying the polluters pays principle and ensuring government and businesses are held to account for their environmental record.
- Similarly, we agree that the Strategy must contain ambitious goals/targets. To ensure this is the case and in order to make a real difference each objective must:
  - Have SMART goals and targets to ensure they are measurable and time bound with clear milestones;
  - New and avoid being merely repeats of existing commitments already made in other policy or agreements that we are currently failing on;
  - Be 'world leading' if we are to meet the ambition set out on P21 that, *Northern Ireland will also have a key leadership role in demonstrating to the rest of the world what is possible.*
- If the Strategy is to 'make a difference to the lives and wellbeing of this and future generations' it will need to remain a 'living' document in that it must be able to respond to new and emerging environmental challenges.

**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?**

**Other Comments**

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

Changing the attitude of society to the environment is crucial to the long-term prosperity of Northern Ireland. Research has shown that outdoor and environmental education has multiple benefits for children. Schools can be seen as drivers of sustainability at the heart of their communities, promoting a culture of 'learning together'. Engaging adults in

informal lifelong learning using the outdoors also brings a range of benefits. Environmental education has been shown to:

- Improve academic performance across the curriculum including numeracy, literacy and STEM (science, technology, engineering, and mathematics) activities
- Encourage children to transfer and apply skills learned in the classroom, and lets them gain skills to tackle future environmental issues facing Northern Ireland
- Increase equality of opportunity for children from all backgrounds
- Bring inherent health and wellbeing benefits to children and adults

It is crucial therefore that a joint Department of Agriculture, Environment and Rural Affairs, and Department of Education 'Environmental Education Strategy' is developed for Northern Ireland, which promotes an expectation of outdoor learning and fieldwork both within the curriculum and through lifelong learning.

We believe the issues, target groups and proposals listed under this theme can be categorised as achieving Behavioural Change in relation to our interaction with the environment. Behaviour change at all levels, in government, in business and in individual decisions and actions, is critical to the success of all the significant changes required to protect and, where needed, restore our environment for current and future generations.

As such this theme could include measures such as:

- Establishing a behaviour change knowledge resource in NI to:
  - Summarise/ disseminate research appropriate for use by government/ eNGOs
  - Support effective and consistent organisational communications with the public
  - Drive public behaviour change in line with necessary changes to business models.
- Carry out local research to ensure suitability of findings elsewhere for NI culture and norms.
- Engage the public, including young people, when deciding on the priorities for which behaviours need to change.
- Increase opportunities for councils to promote environmental behavioural change beyond traditional areas such as waste and recycling
- Encourage and support experimentation to test innovative behaviour change approaches.
- Grow opportunities for young people to take action on the environment and nurture and encourage the next generation of environmentally responsible citizens
- Engage in in-house behaviour change campaigns and support expansion across government departments where success is proven. Expect the same approach from recipients of departmental funding.
- Introduce an environmental 'engagement index' to act as a baseline measure to determine future progress.
- Consideration should be given to communication techniques, and particularly the usability of the DAERA website and/or exploration of alternative online channels

- Behavioural change for ‘business’ is crucial; DAERA should review current mechanisms for engaging with business, including Prosperity Agreements
- DAERA should adhere to best practice with regards to Open Government principles, including Open Data, when engaging with the public

Finally, it is worth noting that the key behavioural change that has helped fund many existing environmental initiatives has been the introduction of Plastic Bag Levy legislation.

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

Mid Ulster District Council agrees 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 and with often competing visions. Failure to integrate policies can result in major long-term negative implications for the environment, which has been the case following implementation of the Going for Growth Strategy which saw a drive to expand the agri-sector in Northern Ireland in order to grow sales by 60% 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 Inquiry) which outlines the need for a ‘transformation in our food and farming system in order to respond to the climate emergency and restore biodiversity, improve the public’s health and wellbeing in all communities and develop Northern Ireland’s distinctive pattern of farming to play its full part in responding to these challenges, supporting and revitalising rural communities’.

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 in a way that is beneficial to nature and the climate, should therefore be a key outcome of the Strategy. Unlike the rest of the UK, the land use, land-use change and forestry sector is a net carbon source rather than a net sink. Forest coverage is around 40% lower in Northern Ireland than the UK as a whole. A Land Use Strategy could rectify this, and facilitate a more strategic approach to land management which 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.

We believe, the environment and the economy can deliver prosperity for society, hand-in-hand. Northern Ireland’s available natural and cultural resources represent what we have ‘in the bank’, in terms of nature and what the environment delivers for society. We need to protect that long-term investment, ensuring that society ‘lives off the interest’ rather than eating in to, and depleting, our irreplaceable ‘Natural Capital’. The Environment Strategy must ensure the development of policies that explicitly recognises the relationship of environment and prosperity, by producing a Natural Capital Index for Northern Ireland.

##### Other comments

- The document notes the importance of the environment and heritage for tourism. As well as the huge potential for eco-tourism using our unique natural heritage, NI

needs an overarching Sustainable Tourism Strategy which respects and protects our valuable natural heritage and is based on a 'high value' tourism model rather than 'high volume' which is the status quo at present;

- A 'Green New Deal' must be included in the Strategy; Government should revisit the detailed proposals for a Green New Deal which eNGOs have previously submitted; as with other actions, cross-Government partnership will be essential;
- There are obvious opportunities for economic regeneration in the built environment; there are many historic buildings lying vacant or languishing in the 'Heritage at Risk NI' list which should be prioritised for restoration; these could be repurposed for community and economic benefit.

**Q6: Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?**

Climate Change Mid Ulster District Council believes that if we are to have '*a key leadership role in demonstrating to the rest of the world what is possible*', we must first address the main issues in relation to climate action in which we lag well behind:

- A Climate Emergency must be declared across all of Northern Ireland
- Given the urgency of the situation and with countries around the world committing to taking action, it is unacceptable there is no specific climate change legislation in Northern Ireland. Legislation for climate change in NI would allow specific policies to be developed to meet emissions targets and enable society adapt our environment to the risks. NI Climate Change Legislation should include:
  - Reduction targets in line with UK legislation and other UK jurisdictions including a target date to achieve net zero carbon emissions;
  - Interim targets and carbon budgets (over five-year periods);
  - Creation of a NI Committee on Climate Change (similar to UK Committee);
  - A National Climate Change Mitigation Plan inclusive of all sectors and tiers of government, with appropriate targets, actions and reporting;
  - A statutory duty on local authorities to develop climate change mitigation and adaptation plans
  - Amendments to planning policy to allow local authorities to set much higher local energy efficiency standards for permitted developments
- Climate Change Adaptation urgently needs to expand, with more attention on reaching the sectors which will be most affected; in particular
  - more focus on local government and its role in driving forward climate action at local level;
  - more focus on and investment in green and blue infrastructure solutions to climate change within the public realm
  - development of a reporting mechanism to assess and monitor progress

Resource Efficiency & Circular Economy The Northern Ireland economy needs to move away from the largely linear system on which it is currently based and its reliance upon our finite resources. We believe the Strategy needs to:

- Tackle the consumption issue (which is ethical as well as environmental) and works towards a circular economy for Northern Ireland;

- Ensure a holistic approach to the circular economy, including smart regulation, market-based instruments, research and innovation, incentives, measures of performance, and information exchange;
- Build Northern Ireland's clean green image as an attractor for inward investment, recognising the economic and tourism potential inherent in our natural and cultural heritage – which demonstrates that Northern Ireland remains committed to delivering our targets for emissions, waste, recycling, and energy efficiency.

Improving the efficiency of resource use and ensuring that waste is valued as a resource rather than an end product, can contribute to reduce dependency on importing raw materials and help the transition to more sustainable material management and to a circular economy model.

Sound and efficient waste management systems are an essential building block of a circular economy. In Northern Ireland there is growing understanding and ambition to work towards creating a prosperous circular economy, creating opportunity for sustainable consumption and production, including increased economic activity and job creation.

This Environment Strategy must enable citizens and economic activity to prosper through clear and action-led commitment. This includes following up on cross-departmental recommendations made for increasing circular economy activity within and by government both directly and through policy development.

Furthermore, the Strategy must ensure NI's circular economy policies align with objectives of the EU Circular Economy Package and so will help to provide:

- Waste prevention and resource efficiency overall
- Effective management of plastics
- Creation of economic opportunities along the supply chain
- Adequate provision to monitor and evaluate impact and benefits
- Improved citizen awareness and commitment through behavioural change interventions and effective communication
- Reduction of marine littering

Develop and implement policies that work across all government departments to promote the development of a circular economy and realise the economic benefits and opportunities this can provide.

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

We would broadly agree with the issues proposed under the Environmental Quality strategic theme. However as previously stated, 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.

- 'New' and 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 date of 2010, 2015 and we are well on our way to 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.
- 'World leading' if we are to meet the ambition set out on P21 that, *Northern Ireland will also have a key leadership role in demonstrating to the rest of the world what is possible.*

Some additional specific comments on this section

- While P25/26 rightly states that *'designation and management of our protected sites is a key tool in our efforts to halt biodiversity loss on land and sea'* it needs to be acknowledged that to date resources/ effort have primarily been directed towards designation rather than management, as evidenced by the poor condition of our designated sites.
- Promoting and facilitating the transfer of unused public land for community and environmental benefit
- Forest coverage is around 40% lower in Northern Ireland than the UK as a whole. A Tree and Hedgerow Strategy should be developed to increase tree cover and hedgerows in a strategic manner, in such a way to alleviate flood risk, improve environmental quality and benefit wildlife by providing ecological corridors.
- Although the document rightly identifies agricultural run-off as the main cause of poor water quality, the issue of mis-connections and cumulative impact of pollution from defective septic tanks also need addressed within the strategy.
- While referencing the issue of dilapidated and unsightly buildings and structures, the strategy should also ensure we do more to protect and maximise the return from our architectural heritage.
- Given the level of the litter problem in our urban areas and wider countryside, it is inexplicable that 'we do not yet have a litter strategy'.
- An additional area worthy of inclusion in the Environment Strategy is light pollution. It is a growing problem, given the diminishing number of 'dark skies'. As well as the impact on nocturnal animals, there are other issues relating to the energy costs of lighting the countryside - roads, floodlit houses etc.

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

We note the statement on P30 that *'While there is support for an independent agency, responses to the most recent discussion document on environmental governance indicated a widely held view amongst stakeholders that the focus should be on environmental outcomes rather than simply changing delivery structures'*. We would however contend that multiple independent reviews of Environmental Governance in NI over the last twenty years concluded that an independent EPA should be introduced here as a matter of urgency. 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.'* It also highlights the need for:

- A separate environment commissioner to be appointed who can participate in a UK-wide environmental watchdog.
- Common UK environmental frameworks to be created which must be sufficiently flexible to accommodate continued cooperation between Northern Ireland and Ireland on a North/South basis under the umbrella of the Good Friday/Belfast Agreement.

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. However, we believe that this should be done on the basis that the OEP will apply to NI *until* a Minister is in place, when they can then decide whether to continue with this arrangement or present alternative proposals for Northern Ireland. Waiting until *after* a Minister is in place risks leaving Northern Ireland with significantly weaker environmental governance when we leave the EU.

The situation will be even more urgent if we leave the EU without a deal and there is no transition period. The UK Government is developing some interim arrangements for England that would apply until the OEP is set-up but there are currently no plans for these to apply to Northern Ireland.

DAERA should either request that these interim arrangements apply to Northern Ireland as well or develop alternative interim arrangements for NI. We believe that relying only on current arrangements (i.e. civil society applying for judicial reviews) will not be sufficient to provide adequately strong environmental governance for Northern Ireland after Brexit.

Regardless of what measures are put in place to replace the EU governance structures, we believe there is still a need for an independent EPA in Northern Ireland.

**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?**

Additional outcomes could be:

- To significantly reduce/ halt wildlife and environmental crime.

- A minimum requirement set for outdoor education time for every child.

## Other Comments

We are generally content with the 6 Draft Outcomes listed, however, the Strategy must set deadlines for these to be achieved otherwise they will remain an open-ended wish list. As previously stated objectives, targets and outcomes should be legally binding and underpinned by shorter-term targets, with appropriate resources and indicators to measure progress.

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

Listed below are a number of 'big ideas' proposed by Mid Ulster District Council and others who attended a cross-sectoral workshop held by Northern Ireland Environment Link and NICVA on the Environment Strategy document. Please note these ideas are in addition to our call for the proposed Environment Strategy to have a legislative footing and the need for an independent EPA as outlined in response to Question 1. These additional ideas are not listed in order of preference and are all worthy of consideration:

- A Climate Change Act for NI with: Reduction Targets in line with UK legislation and other UK jurisdictions; Interim targets and carbon budgets (over five year periods); Creation of a NI Committee on Climate Change (similar to UK Committee on CC).
- All future NI Departmental Strategies and Policies (including Programmes for Government) must help deliver on our commitment to implementation of the UN SDGs with: A SDG Implementation plan for NI with specific indicators; Compulsory incorporation of the SDGs into the local council community plans; Appointment of SD champions in each government department; and the Executive Office responsible for the implementation of and reporting on the (SDGs) to ensure the integration of SDGs into government policy across all government departments.
- Creation of a NI Well-Being of Future Generations Act based on the Welsh example to improve our social, economic, environmental and cultural well-being along with the appointment of 'Future Generations Commissioner' to make sure public bodies are working towards well-being goals and produce an annual report.
- Creation of a Northern Ireland 'Environment Hub' which would provide a shared space for environmental NGOs which would enable more effective use of environment grant funding and more collaborative working in the sector. The site could double up as a public-facing environmental education centre, showcasing best practise in sustainable design and construction, among other functions. The 'hub' could be located on an ex-military base, landfill site or place of cultural or historical significance.
- Creation of a Citizens Assembly on Climate Change / NI Environmental Citizens Advisory panel to improve levels of citizen information, engagement and participation in the

design of environmental policies and strategies that affect NI. There could also be the option of future development into a cross-border environmental citizens advisory panel tasked with exploring an island-wide environment response as the protection and management of the environment on the island of Ireland, from our rivers, seas, air, waste and wildlife, requires cross-border collaboration and affects all citizens.

- Creation of a 'Nature Recovery Network' – A nationwide map for nature - a spatial plan that identifies and creates the corridors and areas of habitat wildlife needs to move in order to recover. It will connect wild places and provide space for wildlife to recover and thrive. To do so will mean putting space for nature at the heart of our farming and planning systems.
- Sustainable Agri-Food Sector Support: the document acknowledges the importance of agriculture for our environment and that how we farm can have positive and negative effects but this concept is not developed further. In order to help farmers combat climate change and restore nature in our countryside, 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. This should be progressed through a 'Public Money for Public Goods' approach. We believe that the entire Strategy needs to 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 benefit.
- That an Independent Environmental Protection Agency (EPA) is established. Northern Ireland remains the only part of these islands without an EPA. We need an EPA to ensure independent and robust monitoring and appropriate mechanisms to hold government to account.

#### **Q11: Do you have any other comments or contributions?**

We would like to see the inclusion of measures/ targets to reduce wildlife and environmental crime.