Draft Environment Strategy for Northern Ireland
CONSULTATION RESPONSE
DATE 01 December 2021

Introduction

Sustainable Northern Ireland (SNI) works with Northern Ireland's public sector to inspire, influence, and inform action on sustainability and climate change. Through our network, we support and empower public sector collaboration to accelerate action on climate change and deliver a sustainable future for all.

We welcome the opportunity to respond to the Department for Agriculture, Environment and Rural Affairs (DAERA) consultation on the Draft Environment Strategy for Northern Ireland and is looking forward to its publication and to working with DAERA on its delivery.

Summary

It is envisaged that this Environment Strategy (ES) will be Northern Ireland's first 'Environmental Improvement Plan' (EIP) and, subject to approval by the NI Assembly, there will be a statutory requirement under the Environment Act 2021 to monitor progress against the Environment Strategy on an annual basis.

The Environment Strategy is intended to be an overarching document setting out NI's environmental priorities for the coming decades and it will form part of the Green Growth Agenda. The Environment Strategy, once approved, will not be standalone. Several new strategies are being proposed and existing policies and strategies will refer to this document in the future with a commitment to improving environmental performance, including actions and timelines.

We endorse the fact that the selected outcomes consider the sustainability pillars of social, environmental, and economic wellbeing, along with treating the climate and biodiversity crisis as a humanitarian crisis, recognising that action is required through global and local cooperation. We are also pleased to see a link to the internationally agreed performance framework for sustainable development, the UN Sustainable Development Goals for each of the listed outcomes. We support the strategy's vision of acknowledging Natural Capital as NI's most precious asset to enhance ecosystem resilience and capacity and to provide nature-based solutions to socio-environmental challenges.

However, we believe this Outcomes Framework isn't an ambitious enough statement on Northern Ireland's approach to delivering on its commitment to protecting nature, tackling the climate crisis, and guaranteeing a prosperous green economy in the coming decades. The overarching objective of the Strategy, the first ever EIP, should be to outline all of the areas that require improvement including actions and timelines for each, with a commitment to inform and consult the public about decisions that may affect them.

In this response, we offer ideas on alternative wording of existing outcomes, as well comments on key priorities and indicators for consideration, backed by arguments to support our position. For example, on page 6 we read "For a high-level Environment Strategy to be meaningful it must be ambitious in terms of its breadth and depth. The Strategy aims to focus on ambitious outcomes for the big environmental issues facing us that will make a difference to the lives and well-being of current and future generations". We think the sentiment of this statement, ambitious outcomes, holds setting a net-zero greenhouse gas emission target in all sectors, including the agri-food industry, with the promise of the Executive's support to guarantee a just transition in all sectors of the NI economy.

We would also like to underline that the Office for Environmental Protection (OEP), a new UK independent body, as stated on page 12 of the ES, will have an advisory and regulatory role in NI, which might raise concern on how much authority it will have in terms of actual enforcement powers. There

are questions about how effectively the OEP will be able to hold the government to account and there has been criticism that some provisions in the Bill allow the government to 'mark its own homework' such as the OEP having to have regard to guidance issued by the Secretary of State. Other restrictions, such as the OEP only being able to bring a judicial review when the 'urgency condition' is met, undermine its ability to meet its principal objective of contributing to environmental protection through enforcement.

The Strategy provides a commitment that Northern Ireland must work with other UK administrations to develop and implement the UK Marine Strategy to ensure good environmental status (GES) in our seas (page 16). We are concerned that the recent approval by DAERA for undersea gas storage near Areas of Special Scientific Interest (Portmuck Natural Reserve, Larne Lough and the Gobbins) will undermine the principal objective of this Strategy to protect the environment and any future efforts to protect marine habitats in the forthcoming Marine Strategy.

Overall, across the document there is a general lack of binding time-bound targets to ensure on-time delivery and execution of plans. We suggest designing a vision with a time-bound goal, with short- and medium-term steps to achieve the more ambitious targets set for 2050, along with a monitoring plan of natural assets and a strategy to track progress through ongoing data collection and collation incorporated in this framework**.**

Consultation Questions

Q1a. Do you agree with Strategic Environmental Outcome (SEO) 1: 'Excellent air, water, land & neighbourhood quality?' Yes or No (Please limit your response to 120 words

Yes. We also wish to see time bound targets included alongside strategic outcomes. Protecting and enhancing ecosystem functioning to guarantee the provision and implementation of ecosystem services will require the Government's assurance of actions taken by a clearly defined deadline. The Scottish Environment Strategy for example, says: "by 2045 restoring nature and ending Scotland's contribution to climate change […]".
Soil quality should be listed specifically rather than just incorporated under land quality, considering soil is one of the most important carbon sinks and it is an excellent indicator of sustainable land management.
The 4% of Ammonia emissions coming from waste handling, road transportation and industrial applications should also be addressed here.

Q1b. Are you content with SEO 1 tables (1 to 6)? Yes or No (Please limit your response to 120 words)

Yes. As protecting and enhancing the natural environment can support a sustainable economy and a just society, we suggest adding the reference to the UK National Emission Ceilings Regulation, the EU National Emission Ceiling Directive and Gothenburg Protocol to the UNECE Convention on Long-range Transboundary Air Pollution, to highlight the Government's intention to collaborate with the ROI and with the rest of the UK, as stated in the Draft Green Growth Strategy.
Particulate matter (PM10) should be added to the Current Status (Table1). It is a significant source of air pollution and includes dust from mines and quarries, roads, construction, wood-burning stoves, and fossil fuel power plants. PM10 contributes to conditions such as cardiovascular disease, asthma, and allergies.

Q2a. Do you agree with Strategic Environmental Outcome (SEO) 2: 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'? Yes or No (Please limit your response to 120 words)

Yes. The rationale behind this outcome is clearly stated and based on social inclusion principles. It should be accompanied by target implementation dates. Setting milestones will support key parties mentioned in the outcome to collaborate in a more cohesive way. Short- and medium-term steps must be considered, as they are fundamental to achieving long-term outcomes

Q2b. Are you content with SEO 2 tables (7 to 12)? Yes or No (Please limit your response to 120 words)

Table 7 has only set 1 deadline. Important decisions like the Sperrins AONB Management Plan publication appear to have been left out. These should be considered alongside the controversial proposal to develop a gold mine and processing plant in the Sperrins. Cyanide will be used to remove the precious metals, which it does not align with the overarching objective of the Environment Strategy or with the outcome. The issue is linked to:
(a) the environmental impact of mine dust which will negatively affect air quality (and may conflict with SEO 1 Table 1); (b) the application of cyanide for extraction (it may conflict with SEO 1 Table 2); (c) the transport of rocks by lorries and generation of waste, both not sustainable options (and may conflict with SEO 5).

Q3a. Do you agree with the Strategic Environmental Outcome (SEO) 3: 'Thriving, resilient & connected nature and wildlife'? Yes or No (Please limit your response to 120 words)

Yes. While the draft strategy makes important commitments, including several provisions for the introduction of NRNs, it fundamentally lacks binding time-bound targets to ensure delivery. Alongside other policy developments, this all-encompassing Environment Strategy has the potential to make a real difference in providing a framework for effective protection and enhancement of nature. As such, we feel it should align with the headline messages of the recent Nature Positive 2030 JNCC Report: 1. Nature loss harms human health and well-being and undermines our economy; 2. Recovering Nature is everyone business; 3. We need to go high nature and low carbon; 4. To become Nature positive by 2030 we must act now.

Q3b. Are you content with SEO 3 tables (13 to 15)? Yes or No (Please limit your response to 120 words)

Tables 13-14 have strong actions and an ambitious vision, but it is not clear how progress is going to be monitored to understand if we are on track to meet specific targets. Without a monitoring strategy, there is no opportunity to improve or refine measures listed in this Strategy or any related strategies and action plans.
Tables 14-15 should contain (a) the identification and measurement of marine natural capital assets, and a framework for assessing change in marine asset and habitat quantity and quality over time; (b) the initiatives to raise awareness of natural capital to enhance public engagement; (c) the full impacts on the economy from investing in natural capital.

Q4a. Do you agree with Strategic Environmental Outcome (SEO) 4: 'Sustainable production & consumption on land and at sea'? Yes or No (Please limit your response to 120 words)

Yes. SNI however noticed that no actions have been reported in Table 16. A framework of actions to reduce emissions and a commitment to sustainable agriculture should already be available at this stage. As highlighted by the Food and Agriculture Organisation (FAO) in their report '*The state of the world's land and water resources for food and agriculture*', historical policies and approaches have increased land and water productivity and output but have also led to environmental externalities in some regions. Agricultural policy has promoted mechanisation, fertilisation, and pesticide use, all of which have created environmental risks and costs. In some cases, land policy has promoted expansion into marginal lands, along with forest and wetland clearance. In Northern Ireland, 75% of the land is farmed. Therefore, if we are to get the right balance of outputs from our land, we must be clear about our objectives for land use.

Q4b. Are you content with SEO 4 tables (16 to 24)? Yes or No (Please limit your response to 120 words)

No, Tables 16 and 17 are poor. Targets based on effective environmental land management that can lead to increases in productivity must be stated. For example, introducing widely spaced trees into permanent grassland can increase the length of time animals remain in pasture by 14-17 weeks per year. This can have a significant positive effect on grass utilisation and ammonia emissions. Similarly, appropriate soil and grassland management for breeding waders has numerous benefits on productivity, including better quality grazing for cattle and more land eligible to farm.

Table 17 could refer in the actions and targets to concepts such as (a) local - energy solutions should be local, wherever possible; (b) environmentally sustainable - a 'green' economy should not be expanded at the expense of the environment or our health. For example, nuclear power is considered a zero-emission energy source however the extraction and processing of uranium into nuclear fuel is extremely energy-intensive (which generates carbon dioxide emissions) and thermal pollution from nuclear power plants also adversely affects marine ecosystems. It is, therefore, on balance, not deemed environmentally sustainable.

Table 20 should state when actions and targets will be achieved.

Table 24 There is no mention of alternatives to antibiotics. Research has shown that there are alternatives to antibiotics that increase animal productivity and help poultry and pigs perform to their genetic potential (probiotics, organic acids, phytogenic, prebiotics, symbiotic, enzymes, antimicrobial peptides, etc). Although the beneficial effects of many of the alternatives developed have been well demonstrated, there is still a lack of information on the mechanism of action, efficacy, and advantages and disadvantages of their applications in the field. Optimal combinations of various alternatives coupled with good farming management and animal husbandry practices are key to maximising performance and productivity while simultaneously reducing antibiotic use in the industry.

Q5a. Do you agree with Strategic Environmental Outcome (SEO) 5: 'Zero waste & highly developed circular economy'? Yes or No (Please limit your response to 120 words)

Yes. We wish to see the agri-industry included in the list of focus areas identified in the document as the greatest opportunity to lead the transition. A 'circular agriculture economy' or so-called agrocycle, proposes a viable alternative model to the current linear economy (take-make-waste) by minimising the number of external inputs for agricultural production, closing nutrient loops, and reducing negative impacts to the environment by eliminating discharges (i.e., wastewater) and surface runoff. Under the lens of the circular economy, agriculture can offer a multitude of opportunities from primary production using precision agriculture techniques, to the recycling and utilisation of agricultural wastes (biofertiliser, bioenergy) and materials (e.g., reuse of plastic containers). The opportunities and technologies are already available, they just need to be enforced and deployed at scale.

Q5b. Are you content with SEO 5 tables (25 to 27)? Yes or No (Please limit your response to 120 words)

No, we are not content with Table 25. It mentions the NI Circularity Gap Report that is due to be published by 2021, however, no specific date has been published and 2021 is almost over. SNI would like to suggest adding further growth sectors e.g., Life and Health Sciences, Wholesale and Retail Trade, and Agro-food to the Circular Economy Strategic Framework as these are among the main sectors that contribute to Gross Value Added (GVA) in Northern Ireland. They were previously identified in a report commissioned by BITC NI *The case for a Circular Economy Strategy for Northern Ireland,* and should not be left out considering that only the Healthcare and social work is Northern Ireland's largest employment sector and the Retail Trade sector is the largest contributor to Northern Ireland's GVA.

Q6a. Do you agree with Strategic Environmental Outcome (SEO) 6: 'Fair Contribution to UK net-zero greenhouse gas emissions & improved climate resilience and adaptability'? Yes or No (Please limit your response to 120 words)

No. Northern Ireland should show a commitment to net-zero by 2050 and that a fair contribution to the UK net-zero target should only be taken as reflective of the minimum commitment required to deliver on the Paris Agreement. Results from the latest Earth system models suggest that the climate may be more sensitive to greenhouse gases than previously thought implying a smaller global carbon budget is required to limit warming to 1.5C. In addition, assuming that developing countries will, on aggregate, implement rapid emissions reduction measures in line with a 2025 peak year is far from certain. For Northern Ireland to make its fair contribution to delivering the Paris Agreement's commitment to staying well below 2°C and pursuing 1.5°C global temperature rise, then an immediate and rapid programme of decarbonisation is needed.

Q6b. Are you content with the SEO 6 table (28)? Yes or No (Please limit your response to 120 words)

No. SNI would like to highlight recommendations from the Tyndall Centre for Climate Change Research that should be included in this strategy:
- To stay within the recommended carbon budget Northern Ireland will need to achieve average mitigation rates of CO_2 from the energy sector of around -13.1% per year
- Northern Ireland should consider strategies for significantly limiting emissions growth from aviation and shipping
- Northern Ireland should promote the deployment of low carbon electricity generation within the region and where possible influence national policy on this issue
- Northern Ireland should increase sequestration of CO_2 through Land Use, Land Use Change and Forestry (LULUCF) to start compensating for the effects of non-CO_2 GHG emission that cannot be completely reduced to zero (e.g., non-CO_2 emissions from agriculture/farming), but to be consistent with carbon budgets Northern Ireland should also take action to reduce these emissions
- The correct management of LULUCF should also include activities that increase wider social and environmental benefits

Q7. Did you find the Environment Strategy content user friendly and easy to follow? Yes or No (Please limit your response to 120 words)

No. The structure of the document is not user friendly and does not provide a general overview of the framework or how the Strategy will be implemented. The Environment Strategy should be given a degree of weighting over other government strategies and policies (e.g., transport, land use) to demonstrate its importance and cross-cutting nature. The strategy's format is confusing and despite most of the outcomes being interrelated, interdependencies are not linked between sections, hence it is not easy to follow.

Q8. Do you have any other comments or contributions? (Please limit your response to 120 words)

A few important points are missing from this strategy that we suggest are included:
- Key evidence gaps and examples of actions underway, to help drive progress towards the Environment Strategy vision by 2050.
- Evidence-based conservation actions should be highlighted, and cross-border collaborations should be encouraged for example initiatives like the Nature Recovery Network (NRN), and All-Ireland Pollinators Plan, and the All-Ireland Climate and Biodiversity Research Network (AICBRN).
- A monitoring framework should be developed to track the delivery of this Environment Strategy.
- The agri-food industry in Northern Ireland should make a commitment to net-zero, becoming a key asset of this strategy, since agriculture has a unique place as both an emissions' source and a sink. The carbon reserves already in our soils and vegetation can be protected and enhanced by modifying some of our farm practices and by better managing our hedgerows and farmland trees. In addition to these nature-based climate solutions, the agri-food industry can help to capture more carbon by growing the raw materials for bioenergy and the bioeconomy alongside our food production. Good examples of setting ambitious targets to reach net-zero are reported by the National Union of Farmers in Wales (NUF Cymru). The NFU has prepared a complete guide to an ambitious productivity programme towards net-zero by 2040, with a just transition for the agricultural/farming sector, based on improvements of land use and land management along with the government's support as the foundation for 3 pillars – 1. Boosting productivity and reducing emissions; 2. Carbon storage/nature-based solutions; 3. Renewables and bioeconomy.
- Public engagement to increase awareness on the importance of natural capital and the full impacts on the economic growth of investing in natural capital are important pillars missing in this document.