

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

6 January 2020

Dear Sir or Madam,

Environment Strategy for Northern Ireland

Sustainable NI welcomes the proposed publication of an Environmental Strategy for Northern Ireland. We believe it provides an opportunity to address environmental harm in a holistic way and we agree with the broad environmental areas identified. However, we note the document is somewhat lacking in ambition and does not order issues in terms of relative importance and timescale.

Sustainable NI believes that the Strategy should be much more ambitious. It should look at short term actions, but also longer term measures beyond the next government programme cycle. We believe that reversing biodiversity loss and halting climate change should be paramount. At the very least, the Strategy should place the strongest emphasis on these issues, as they are arguably the most time critical and far reaching in terms of impact.

As the UK Government declared a 'Climate Emergency', in May 2019, we have a once in a lifetime opportunity to decarbonise our economy once and for all, before it is too late. It is vital therefore to frame most if not all of the issues in this Strategy in light of this monumental challenge. The tone and ambition of the Strategy must reflect the urgency of the climate crisis, setting out how Northern Ireland will rapidly reduce greenhouse gas emissions, improve the quality of the environment, protect environmental and historical assets, reduce waste, protect biodiversity and adapt to the impacts of climate change.

The Environment Strategy for Northern Ireland must:

- 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 they should have a proactive duty to implement it and be held accountable for the impacts of decisions taken.

- Be independently monitored with robust mechanisms to hold government to account.
- Have statutory footing and binding targets that are clear, measurable and ambitious and in line with the SDGs. 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.
- 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:

- A Northern Ireland Environment Act is created to give the Environment Strategy a binding, legal footing.
- Creation of an independent Environmental Protection Agency (EPA). 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.
- Introduction of a Northern Ireland Climate Change Act. Given the implications of Climate Change for all aspects of NI society and our massive over-dependence on imported fossil fuels despite our abundant local sources of renewable energy, NI urgently requires a Climate Change Act. It should include an action plan with a net zero target for GHG emission reductions and renewable energy generation in line with UK Climate Change Committee recommendations. The Act should place a statutory duty on public authorities to adapt to and mitigate climate change.
- A central government department for climate policy. As climate change crosscuts several government departments it will require an integrated policy response. Although there are obvious parallels with waste and other environmental policy areas, climate change requires an 'all of government' response. As most of the solutions to climate change sit outside of DAERA's responsibilities, serious consideration should be given to moving climate policy to a central department.
- Climate services. External climate services should be established by the Government to support and coordinate climate change adaptation and mitigation efforts outside of government. This should include commissioning and co-ordinating scientific research to facilitate evidence based policy making, as well as communicating climate science and policy information to key stakeholders. Currently, government funded support is restricted to climate change adaptation work.

- Mainstreaming of UN Sustainable Development Goals (SDGs). All future Programmes for Government must help deliver on our commitment to implement the UN SDGs and include: Specific NI indicators; Compulsory incorporation into local council community plans; Appointment of SD champions in each government department; and the Executive Office should be responsible for implementation/reporting.
- A NI 'Well-being of Future Generations Act'. Based on the Welsh example, this Act would improve the social, economic, environmental and cultural well-being of NI by encouraging cross-departmental cooperation; and improve partnership working with people and communities to undertake long-term planning to prevent problems through a more joined-up approach. It would help create a NI that people will want to live in, now and in the future.
- Creation of a NI Environmental Citizens Advisory Panel. Such a Panel would improve citizen information, engagement and participation in the design of environmental policies and strategies that affect NI. As the island of Ireland and its surrounding seas represent a single biogeographic unit consideration should be given to the future development of an all-island Environment Plan and a cross-border environmental advisory panel tasked with exploring an island-wide response to environmental issues that affect all citizens.
- Sustainable Agri-Food Sector Support. A growth strategy to support sustainable small-scale farming should be developed with provision for training and incentives for farmers/landowners to support environmental initiatives such as combatting climate change and restoring nature in our countryside. Farming subsidies should provide an incentive for farmers to farm in a way that helps protect the environment. This should be progressed through a 'Public Money for Public Goods' approach.
- A Cross-Departmental Strategy for Education for Sustainable Development is developed. This strategy should lead to a systemic change in teaching and access to environmental education for all age groups and encourage long-term attitudinal and behavioural change in relation to our interaction with the environment. It should include ambitious targets for outdoor learning.

Sustainable Development is an important aspect of Sustainable NI's work and we have developed a 5-year strategy '[Time for Change – Creating a More Sustainable Future for Northern Ireland](#)' to ensure that our activities and decisions make a positive contribution to the Sustainable Development Strategy for Northern Ireland. Supporting local government and public bodies in embedding the principles of sustainable development in policy and practice is the cornerstone of our approach.

We note that councils require support in the area of climate change adaptation and mitigation planning. Whilst Climate NI provides support to councils on climate change adaptation planning, there is no equivalent government funded support service for climate change mitigation activities. This gap in support must be

recognised and addressed.

We enclose our comments on the consultation discussion paper, formulated through engagement with colleagues in Northern Ireland Environment Link, Local Authorities, NI Assembly and the Northern Ireland Housing Executive.

We look forward to seeing the first draft of the Environment Strategy for Northern Ireland and we would be pleased to provide additional opinion if it would be helpful.

Sincerely,

A handwritten signature in black ink that reads "Nichola Hughes". The signature is written in a cursive, flowing style.

Nichola Hughes

Executive Director

ABOUT YOU

Name (required)

Nichola Hughes

E-mail address (if responding electronically)

nichola@sustainableni.org

Address (if responding by post)

Organisation (if applicable)

Sustainable Northern Ireland

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?

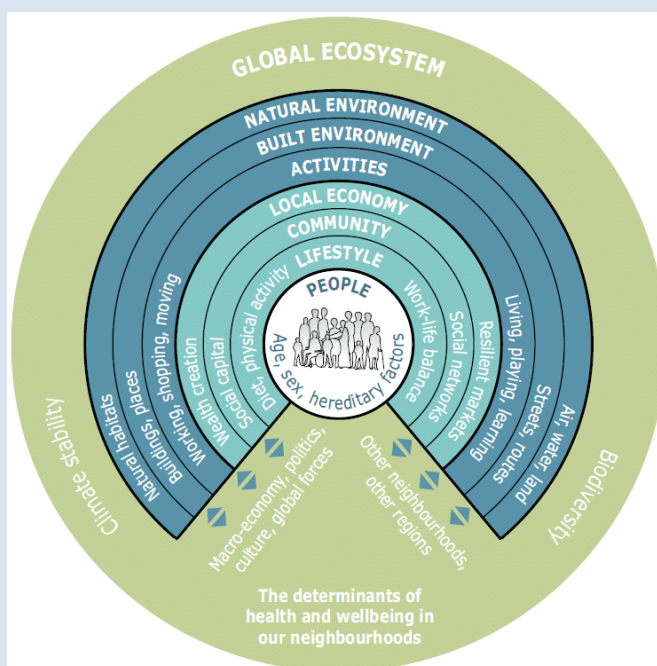
Yes

No

Comments

Sustainable NI believes that the importance of the Environment Strategy should be at the very least, on par with other Executive endorsed Strategies and that all Government Departments and public bodies must have regard to it, when exercising their functions.

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, Sustainable NI 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.

In addition, Sustainable NI believes that the Environment Strategy is a key opportunity to drive forward climate and sustainable development policy, and in this regard we think:

- the Environment Strategy should be ambitious and seek to bring forward a ‘whole-of government’ approach to mitigating and adapting to climate change, breaking down the traditional silo mentality that exists between government departments, and providing opportunities to consider cross-cutting risks and opportunities
- the provision to develop a national climate action plan, as strategy in regard to climate change mitigation is currently lacking in Northern Ireland
- the draft Strategy could aspire to better incorporate social and economic issues and analyse how they interact with environmental outcomes
- consider a similar approach to the in Wales, where sustainable development and environmental considerations are front and centre of all government policy and decision making, requiring public bodies to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change.

While the draft Environmental Strategy describes the challenges, we believe there should be more information and ideas on how to tackle these challenges.

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?

Sustainable NI generally agrees with the seven identified Environmental areas:

- Climate Change (mitigation and adaptation);
- Natural Environment and Landscapes;
- Resource Efficiency;
- Marine Environment;
- Environmental Quality (Air, Water and Neighbourhood);
- Fisheries (Inland and Sea) and Aquaculture; and
- Built environment.

Biodiversity We believe “biodiversity” should be explicitly listed as part of “Natural Environment and Landscapes”. As biodiversity is in significant decline, we believe this is an area which warrants specific attention. In October 2019, the State of Nature report states that 41% of species have declined since 1970 and 272 species are threatened with extinction. Action plans should be developed or updated under each of these areas, to set out how issues can be addressed. For example, Northern Ireland Biodiversity Group was set up to apply the principles of the UK Biodiversity Action Plan and to propose measures to support the conservation of biodiversity for the period 2001-2016. This strategy is now out of date and needs renewed against current evidence.

Energy We believe while there is merit in grouping Climate Change Adaptation and Mitigation in one heading, large swathes of the mitigation effort will rely on future energy policy, which is led by a different Department. The Strategic Energy Framework and the Environment Strategy will need to work harmoniously and seamlessly together to drive government mitigation efforts, which will not be straightforward. In addition, the Department for Infrastructure will be responsible for bringing forward zero-carbon transport policies and programmes, and a planning policy framework conducive to zero-carbon resilient buildings and infrastructure. The Environment Strategy will need to set out how Government is going to manage and coordinate this, particularly if the Department decides not to develop an overarching Climate Change Strategy. The Environment Strategy will need to, in effect, pick up where the other departmental strategies and plans leave off, examining the full gamut of climate related policies, not just emissions from agriculture.

Planning The planning system in Northern Ireland currently promotes unsustainable patterns of development which are inconsistent with the aims and objectives of the Northern Ireland Sustainable Development Strategy and the UK Climate Change Act. A review of planning

legislation and in particular ‘Permitted Development Rights’ and retrospective planning permission is required. 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.

Historical environment 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 would also like to see a specific reference to housing under “Built Environment”. Housing is central to people’s lives. It accounts for 13% of greenhouse gas emissions and we would like to see actions developed to improve the energy efficiency and sustainability of new and existing homes, to help improve the environment, mitigate and adapt to climate change, and improve people’s quality of life, health and wellbeing.
- 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 Sustainable NI, 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, an 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 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.

We would like to see engagement and training made available for political representatives, government officers and the private sector, to consider the environmental effects of proposed policies, strategies and current and proposed activities. In the Local Development Plan process, proposed policies must be assessed against a Sustainability Appraisal (SA). We believe that SAs should be used by all policy makers, beyond the planning process. This would highlight areas where there could be an adverse effect on the environment and where mitigation should take place.

We would also like to see increased public awareness for households on the environmental impacts of behaviours, which have been increasing in recent years. For example, while street lighting is important for the safety of communities, increased LED lights in gardens is leading to an increase in light pollution. As well as using energy, light pollution disrupts ecosystems by harming animals whose life cycles depend on dark, and has adverse health effects on people by altering the biochemical rhythms that align with natural light levels. Other increasing activities, which can damage the environment are the use of wood burners and the increased use of tarmac and asphalt as people use their front gardens for parking cars. Wood burners contribute to air pollution, a major health problem causing respiratory illness and increased hard surfaces, as well as often detracting from residential character and amenity, can increase the risk of flooding.

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?

Sustainable NI 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.

We believe development does not have to be at the detriment of the environment. Development and environmental protection can promote attractive places, where people wish to live, work, and invest in, thereby supporting local economies and social wellbeing. The natural environment is valuable to provide food, energy, flood control, clean water, clean air, aesthetics, and to support wildlife and biodiversity. Therefore, Sustainable NI would like to see natural environment considerations effectively mainstreamed into policy and decision making and to realise its potential in creating and maintaining high quality living places.

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 Sustainable NI 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
- Legislation that commits Northern Ireland to becoming a net-zero carbon society by 2045 – five years before the rest of the UK. NI Climate Change Legislation should include:
 - Interim climate targets (2030)
 - Five year carbon budgets
 - A national carbon tax in line with UK Climate Change Committee recommendations.
 - A National Climate Change Mitigation Plan inclusive of all sectors and tiers of government
 - A statutory duty on public authorities to develop climate change mitigation and adaptation plans
 - An independent climate advisory council recommending carbon budgets for different sectors in Northern Ireland and providing scrutiny on government action to address climate change
 - Legislation to ban petrol and diesel cars from 2030
 - Targets for Electric Vehicle deployment
 - Targets to improve the energy efficiency of new and existing homes by retrofitting homes, large scale deployment of heat pumps and banning the installation of oil boilers from 2022 and gas boilers from 2025 in all new homes.
 - Amendments to planning policy to allow local authorities to set much higher energy efficiency standards for permitted development
 - A target to provide 70% of electricity from renewable sources by 2030.
- An agri-food strategy for Northern Ireland that is conducive to UK climate change aspirations
- 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 support for the farming community, who will be significantly impacted by changes in the climate
 - More public investment in green and blue infrastructure solutions to climate change within the public realm;
 - Development of a reporting mechanism to assess and monitor progress on adaptation

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.
- With regard to energy efficiency, we support a “fabric-first” approach, which can help alleviate fuel poverty and deliver quality, sustainable housing. In addition, we

would to see the integration of renewable energy technologies, both in the design of new buildings and through the appropriate retrofitting of such technologies to existing buildings. We would like to see new Local Development Plans require that developers to demonstrate that measures to reduce energy consumption and incorporate sustainable design solutions have been considered and incorporated into their proposals.

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’. Any litter strategy must be properly resourced.
- 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.
- There should be recognition that the built environment, and how we build and develop land, has a critical impact on the environment. Well-designed homes and buildings are efficient and cost effective to run. They help to reduce greenhouse gas emissions by incorporating features that encourage sustainable lifestyles. They maximise natural ventilation, avoid overheating, minimise sound pollution and have good air quality. The Committee of Climate Changes Mitigation and Adaptation’s report “UK housing fit for the future?”, published in February 2019, states without a near elimination of greenhouse gas emissions from UK buildings, the UK’s legally binding climate change targets will not be met. It also states that energy use in homes, excluding heating, accounts for 14% of UK total emissions. We believe that new homes should be designed to be energy efficient, low carbon, water efficient, and climate resilient.
- We support a review of building control standards to require low carbon building as standard. We note that throughout the British Isles development plans are increasing requiring on new homes to be built to zero carbon standards or to passive design. Well-designed homes and buildings that are efficient help to reduce greenhouse gas emissions, by incorporating features that encourage sustainable lifestyles. They maximise natural ventilation, achieve thermal comfort, and can

enhance biodiversity by providing habitats for animals and birds, such as the incorporation of swift nest bricks in new developments.

Well-designed developments create compact and walkable neighbourhoods with a mix of uses and facilities reducing demand for unsustainable travel patterns and energy as well as supporting health and well-being. New development can also contribute to community resilience and climate adaptation by addressing the potential effects of temperature extremes in summer and winter, increased flood risk, and more intense weather events. In addition, the provision of trees and green open space include can aid flood protection and water management, help mitigate the effects of climate change, promote regeneration and investment and increase a sense of place and well-being.

- We would like to see a precautionary principle employed when determining the impacts of policies on natural heritage resources. The consideration of biodiversity and natural heritage issues at the earliest possible stage of project preparation/design can allow any necessary mitigation to be 'built in'. The use of the Northern Ireland Biodiversity Checklist can help identify if a development proposal is likely to adversely affect biodiversity and natural heritage interests.

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?

Amend outcome 3 to:

- We have a net-zero carbon and climate resilient society

Amend outcome 4 to:

- Biodiversity loss reversed, with biodiversity protected and enhanced, ecosystems in a healthy state, and well managed landscapes

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, they are not time bound. 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 Sustainable NI 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 which commits Northern Ireland to becoming a net-zero society by 2045 with an ambitious interim target to reduce emissions by 75% by 2030; introduction of a Statutory Duty on Climate Change; Creation of a NI Committee on Climate Change (similar to UK Committee on CC) and the introduction of a National Mitigation Plan.
- 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 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.

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.