Sustainable Northern Ireland (SNI) is a networking and support body for statutory and non-statutory organisations concerned with the pursuit of sustainable development in Northern Ireland. We work closely with councils to promote and deliver sustainable development policy and practice at a local level. Our work programmes encourage organisations to integrate the principles of sustainable development throughout their operations, and deliver bold and innovative projects to promote economic, social and environmental wellbeing. Sustainable NI, its Board of Directors and membership brings together a range of knowledge, experience and expertise which can be used to help inspire, influence and inform both policy and practice in the field of sustainable development.

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Introduction

The Democratic Unionist Party is preparing a new policy paper on the theme of the environment. The scope of the paper will be comprehensive with the aim of a full policy statement relevant to the national Parliament, a restored Assembly and local Councils.

The Consultation Process

A three-stage consultation process is envisaged:

- Pre-consultation paper – This paper will set out the planned scope of the full public consultation document. It will detail the issues that the DUP has identified for the full policy paper to examine. Engagement and responses will be sought on these issues.
- Full consultation paper – This will propose policy ideas and options to address the identified issues and those highlighted in the pre-consultation process.
- Final policy document – following the second consultation on the full document a final policy paper will be adopted that will inform future DUP manifestos.

This process will involve external and internal engagement that will run concurrently. Nothing contained within the Pre-consultation nor Full consultation paper constitute DUP party policy. It is only at the final stage will an idea or an option become party policy.

Over-arching approach

The core aims of the policy will be to ensure that:

- That we can all live in a healthy, greener and pleasant place, region, country and world.
- That we can grow and develop economically while passing on an environment as good if not better than our generation received it.
- That we gain economic advantage by seeking to be in the forefront of technical innovation to achieve environmental goals that are common across the world.

The underlying philosophy is that the perfect should not be the enemy of the good and that environmental progress has too often been held back by seeking perfection and as a low tax party a sceptical approach to taxes.

Four themes

It is envisaged that the full consultation paper will be built around four themes. The nature of the topic that issues and answers will be cross-cutting.

Theme 1 - Global Environment policy and the UK’s role

The aim should be the United Kingdom plays a leadership and practical role in advancing environmental interests. This has been pursued primarily through two policy approaches

a) Leading by positive example e.g. Clean Air Act.

b) Commitment to development and implementation of global agreements e.g. Paris Accords.

However, the policy paper will examine the opportunity to look at two further areas:
c) Multi-lateral government action – sometimes waiting for all the world to agree is not path that will deliver results and in a number of areas environmental problems to not apply to all countries therefore multi-lateral action is the more appropriate tool. No one nation can take the lead on all issues therefore the UK should choose and seek to be the leader on one or small number of environmental issues e.g. deforestation

d) Foreign Aid and the Environment – The DUP has supported the UK’s adoption of the 0.7% GNI and it is another example of UK positive leadership by example (in 2017 the UK was 1 of only 6 countries which met that United Nations (UN) target). Foreign Aid should be a contributor to global economic growth, political stability and promote security. However, the UK programme does not sufficiently prioritise environmentalism within it. Its approach to spending has two flaws. First, revisions to GNI figures have required significant amounts spent quickly which is usually a recipe for waste. Second, the fitting spend to match the required timeframes for the target has led to ‘book movements’ to achieve the target (e.g. donations given to large global organisations’ to meet in year spending levels). Alternative approaches to this could result in clearer and longer-term successes.

Theme 2 - Environmental protection

Under this theme will be a number of existing and emerging issues that need to be addressed:

a) **Air Pollution** – There have been a number of emerging and developing issues around the air that we breath. In pursuit of CO2 reductions, the growth of diesel has been now found to have contributed to gases and materials in our air that are hazardous to human health. The full policy paper will examine what action is needed to improve air quality and where different levels of government can act proportionately.

b) **Water pollution** – Northern Ireland has a growing population as does the United Kingdom. Therefore, we need to pursue a policy of adequate safe water resources (including for scenarios with unusual weather patterns). This will need necessary water infrastructure and protection of our water resources from pollution.

c) **Future Development** – Northern Ireland’s Councils are presently preparing their Local Development Plans which will shape development in each area for decades. These plans so far are based on continuing with present patterns and forms of development. These present forms and patterns need to be assessed and consideration given to what may need to change in the longer-term to ensure healthy and pleasant places to live as well as our land use policy and priorities.

d) **Oversight** – The achievement of environmental goals is achieved by government by necessary legislation with appropriate oversight and enforcement while individuals contribute through their life choices and the private sector through good business practices. Thus, the existing legislative and oversight will be examined and options considered.

Theme 3 – Decarbonisation of the economy

The United Kingdom is legally committed to the ‘decarbonisation’ of the economy. The 2050 target was recently raised from 80% to 100%. The degree of change involved in attempting let alone achieving that target both in terms of technological innovation and cost should not be underestimated with fundamental questions to be asked and answered about how we support innovation and who bears the costs and how.
a) **Energy and heat generation** - In seeking to achieve such an aim we must do so while maintaining a fundamental commitment to cheap and secure energy and heat. The technological solutions we will require to see deep and lasting cuts of CO2 are not in sufficiently developed form or in existence. This means we must accept there will be a bridging period involving technologies with lesser carbon emissions. This will involve an examination of past and present approaches to energy generation with an examination of the present and proposed energy mix and assess the roles (if any) of coal, gas, nuclear, wind, solar, hydro-electric, geothermal, tidal, hydrogen and energy from waste as well as the potential contribution of interconnection, carbon capture and macro v micro generation. In all this there needs to be transparency in costs, that government interventions and levies should be for their policy goals not income generation and that the result of policies is to transform energy intensive industries not compel them to countries with cheaper energy and poorer environmental controls.

b) **Energy efficiency** – Energy and heat wasted means a cost to the householder and ultimately pollution to our environment that shouldn’t have been needed. The paper will review the impact of the range of government policies to promote and secure energy efficiency. Equally, we need to consider what regulations are placed on new buildings to assist in the achievement of future energy and environmental goals.

c) **Transport** – Changes in this area will impact directly and indirectly on CO2 targets, air pollution and water pollution. The immediate challenge is to reverse the dependency on diesel (while acknowledging the growth of diesel was a past government policy). The broad goals will be to shift transport from fossil fuel to electrically powered or fuel celled transport with the implications for energy supply as well as encouraging shifts to public transport and cycling and walking (which work best with greater population densities). There are also significant matters to be considered in the area of air travel with punitive and failing environmental taxes.

d) **Circular Economy** – The waste we produce and what we do with it has an environmental impact now and in the future. Our solution has been to bury the problem of waste or export it to areas with laxer standards or enforcement creating environmental damage e.g. plastic pollution in the sea. Landfill has been made an ever more expensive option and countries are closing their doors to our waste. In Northern Ireland there is no uniformity of recycling across councils, not as much recycled as is elsewhere and the methods of collection do not maximise ‘clean’ collection that increase recycling rates and the revenue potentials. This has job creation potential. Energy from Waste (EfW) has so far not yet been achieved in Northern Ireland despite being a standard approach elsewhere and in countries with high environmental standards e.g. Scandinavia (though a private EfW may start contributing shortly to local energy supply).

Theme 4 - Biodiversity and Habitat

The paper will highlight the growing problems with soil quality, decline of pollinators, the relationship between bio-diversity and productivity and protection of coastal seas. It will also seek to build on the work commenced on coastal areas by past DUP ministers and in much broader terms how the protection of the Atlantic Ocean can be advanced. This is an area that all those with green space can contribute too, the role of reforestation and what technological innovation can
contribute. This is underpinned by a belief that Northern Ireland well suited as a test bed for new approaches in the United Kingdom.

Other policy papers relevant to this work

This year the DUP will be developing a policy paper on future agricultural support policy therefore, the environmental paper will not go into significantly into this policy area. Past agricultural support has included environmental goals and the paper will restrict itself to potential environmental goals as well as the new opportunities for new forms of agricultural to reduce food miles. The paper also produced a paper for the future of the fishing industry post-Brexit with a number of relevant elements.

Consultation questions

Over-arching approach

• What is your view of the three core aims of the policy?

The aims are generally good however the 2nd and 3rd one lead with the economic case rather than the environmental one which begs the question should this be a ‘sustainability’ paper? Otherwise they need re-worded to lead in both cases with the environmental case, firstly we should be protecting and enhancing our environment in ways that will improve the economic stability of NI. Secondly, we should be supporting environmental innovation to improve our economic status with due consideration for BATNEEC (Best Available Technology not Exceeding Excessive Cost)

• What is your view of the underlying philosophy to the assessment and adoption of new policies?

I don’t think there has ever been a drive for perfection. What we fail at is not working together for the same ultimate aim of protecting our environment, we are all guilty of silo working. Can I suggest a philosophy of working together in partnership, putting political differences aside, to achieve environmental stability and sustainability – achieving Sustainable Development? A future for our children!

The comment re taxes is not relevant. This document needs to be a focus on the future not the past.

Four themes

• Are the four themes sufficiently comprehensive?

Yes I think the 4 themes are a good general cover – comments below on specific themes.

• What additional themes would you suggest?

There is no mention of Climate Change which is not only a huge topic of discussion and action at the minute but is very high on the agenda of many councils and other public and private bodies. This issue is not only very current but incredibly urgent! This is a huge
omission. Belfast City Council through the PCAN project have developed a Belfast Climate Commission and now have a Resilience Commissioner in post, Derry City & Strabane City Council are already well advanced with their CLIMATE project (looking at climate change adaptation, green infrastructure and resilience), a number of councils have called or are due to call Climate Emergencies, we are facing potential food shortages as a result of climate changes and more extreme weather, our infrastructure is not supporting the dramatic weather changes which come as a result of climate change (e.g. flooding in many parts is becoming more common), emergency planning is now common practice for severe weather etc.

The DUP should be supporting the need for a Climate Bill with clear targets, mitigation measures and planning for adaptation to meet the unavoidable impacts of climate change, introducing ‘climate proofing’ across public policy.

Agriculture and land should have greater prominence in the policy. Land use has been highlighted as being at serious risk with respect to climate change, food production and agriculture. As agriculture is so prevalent in NI it is short sighted to not cover this further in this document. Noted a separate report is being drafted but it still should be referenced within this.

DUP should be lobbying for a Land Strategy for NI to ensure the best use is made of our land and landscapes respecting the views of communities, striving for environmental excellence and making best use of our lands multi-functionality, protect our natural heritage, maximise tourism potential and preserve the historic landscape.

- **Are there specific proposals you wish to submit under any of the themes for our consideration?**

There are no targets, no aims or objectives or no clear actions to move forward. Perhaps some thoughts or detail on more specifics of areas to target, who to work with and support in current projects, eg the development of the NI 5 year Environmental Strategy, better reporting to the UK Response on the SDGs (see below)

### Global Environment

- **Do you agree with the four sub-themes?**

SNI believe that as a signatory to the UN Sustainable Development Goals (SDGs) the UK/ NI should use this shared blueprint for peace and prosperity for people and the planet, now and into the future. The SDGs were an urgent call for action by all countries in a global partnership and recognises: ‘that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests’. Unfortunately, to date NI has failed to embrace its SD responsibilities. We suggest therefore that the DUP promotes and utilises the SDG framework in order to achieve true sustainable development at home and abroad.
As per theme 1, C we should lead on a small number of smaller environmental issues – as above – we should be working collectively – what we do locally affects globally.

- **What additional sub-themes would you suggest should be taken into consideration?**

  I question the relevance of the Foreign Aid topic within this paper however SNI would support the introduction of measures to ensure foreign aid does not support or promote environmental damage but rather actively contributes to environmental protection and enhancement.

  Another suggestion if we are considering a more social, economic sub theme an alternative would be social value. NI still does not have a Social Value Act and many are campaigning for this. Perhaps the DUP within its agenda could make it an action to campaign and support the development of an NI Social Value Act when the Assembly returns to operation.

  Environmental, Health & Well Being - the importance of considering the environment, health and wellbeing together rather than separately because these issues interact in complex ways with a range of costs and benefits for society, eg parks/open spaces, clean air, green prescriptions, improved mental health leads to healthier societies, improved attendance at work, less strain on local health services, less strain on social services etc.

- **Are there specific proposals you wish to submit under any of the themes for our consideration?**

  Development of Green Prescriptions to deliver health & well-being options through environmental action by promoting the understanding of how a healthy environment is essential to human health and wellbeing by improving collaboration between health and environmental sectors.

  **Environmental Protection**

  - **Do you agree with the four sub-themes?**

    The 4 themes are well covered but as mentioned previously Climate Changes has not been mentioned – I refer to previous comments.

  - **What additional sub-themes would you suggest should be taken into consideration?**

    Climate Change – previous comments

    Environmental protection in Northern Ireland causes problems for the health of our people and wildlife, as well as for our economy. Northern Ireland remains the only country of the UK without an independent Environmental Protection Agency and weak governance is thought to have cost over £1 billion.

    Appropriate environmental oversight and enforcement needs to be one of the key issues addressed in the consultation paper and subsequent DUP Policy.
SNI believe that the development and implementation of a Land Strategy for Northern Ireland should be brought forward as a matter of urgency. We would refer to the 2015 Report ‘Towards a Land Strategy for Northern Ireland’ prepared by the James Hutton Institute for the NI Land Matters Taskforce. The report recommends a Northern Ireland Land Strategy to support the Programme for Government, sitting above the suite of sectorial policies and alongside other strategic documents such as the Strategic Planning Policy Statement. A Land Strategy cannot, and should not, determine actual land use in specific localities; this should be shaped locally by communities, groups and individuals. Rather, it represents an overarching framework to ensure local and regional policy, decision-making and resource allocations contribute to fulfilling the strategic needs of Northern Ireland.

In regards to local planning a number of councils are striving for improved environmental performance and sustainability within a number of their high level strategies including their Corporate Plans, Community Plans and Local development Plans. At its very basic councils must enhance sustainability and it is evident within new draft LDPs that there is particular focus arounds sustainable energy, transport, water etc which the DUP should support and encourage through their own policies. We are keen that a note is made in ‘designing’ for the future – that all aspects of future development have considered are changing landscapes – we should be regenerating existing properties rather than buying new, increasing the amount of green spaces, designing for increased levels of flooding in a natural way, incorporating cycling pathways and greenways, designing for sustainable transport systems and building communities.

In addition, DUP should be showing support for Environmental Education particularly with projects such as Eco-Schools.

Education could be taken a step further and an Environmental Education Strategy introduced for Northern Ireland promoting outdoor learning and fieldwork.

- *Are there specific proposals you wish to submit under any of the themes for our consideration?*

Under air pollution there should be specific proposals (and this links to your decarbonization theme) on banning fossil fuels/divestment from fossil fuels – DUP should be encouraging improved public transport network, green transport options (cycle lanes and paths) and moves towards renewables (again links to your energy efficiency heading).

A Wellbeing of Future Generations Bill for NI to ensure that planning for the future protects natural and cultural resources needed for life and remain there for future generations.

**Decarbonisation**

- *Do you agree with the four sub-themes?*

A few points have already been made but DUP should be supporting zero carbon strategies – e.g. banning of fossil fuels. Councils are now looking towards zero carbon and therefore
DUP should be supporting this through their own strategies under the sub heading of energy & heat generation

The DUP should support the current UK Net Zero Target by promoting behavioural change in Northern Ireland.

On energy efficiency there needs to be focus on both behavioral change on individuals in terms of reducing our reliance of fossil fuels (again links to a ban on fossil fuels, divestment from fossil fuels, support of a greener public transport system and support of efficient cycle lanes), promotion of car sharing/pooling, reduced energy use/wastage at home, support and encouragement in the use of energy efficiency systems.

A more integrated, strategic, sustainable approach to transport is required to that currently being pursued, particularly in relation to investment, which also promote and facilitate behavioural change. A more sustainable transport system can realise significant cross sectoral benefits in a number of key areas, including, human health and wellbeing, economic development, environmental protection and air pollution, energy security, social justice and mobility and integrated policymaking in Northern Ireland. The only way we will meet the targets is not by encouraging a mass take up of electric/hybrid cars but by making people forgo the need for cars by either adopting public transport or cycling.

Such an approach will help reduce Greenhouse Gas (GHG) emissions, in particular CO₂ emissions, within the transport sector in line with targets in the UK Climate Change Act (2008) and The Europe 2020 Strategy.

Finally, under circular economy the Waste Hierarchy needs to be included. Historically landfill is more common practice but again 2 approaches are needed. One to encourage behavioral change through the waste management hierarchy to encourage waste reduction first, reuse and then recycling. We should be aiming for avoiding waste first and foremost. We have become a generation of ‘disposable’ which is not sustainable. Secondly there needs to be better investment in our waste management infrastructure. Firstly, waste is now seen, and is now commonly referred to as, a resource. We need to improve what is collected, how it is collected (more local recycling) and finally what is the new product. We need to look at designing for recycling and disposal to ensure that a product is as recyclable as it can possibly be within the infrastructure we have. If we are to look down the route of EfW then that requires investment however burning is not the solution as per the requirements of the Waste Framework Directive.

- **What additional themes would you suggest should be taken into consideration?**
  
  More emphasis on the Waste Management Hierarchy – waste prevention, reduction and reuse before recycling and encouraging behavioral change as above.

- **Are there specific proposals you wish to submit under any of the themes for our consideration?**
  
  Policy Development around Circular Economy – smart regulation, research, innovation, measuring performance (reporting on the SDGs) and information exchange.
Bio-diversity and Habitat

- **Do you agree with the issues identified?**

  Yes in general, although more detail is required – see next questions.

- **What additional issues would you suggest should be taken into consideration?**

  Linked also to decarbonisation we need to look towards more green spaces, protection and restoration of peatlands & forests, encouragement of green infrastructure etc. – for many reasons already mentioned but key to providing carbon sinks to reduce the effects of climate change.

  It is universally accepted that our society, economy and individual well-being depend upon a healthy natural environment. It underpins everything we collectively produce and consume and we rely on it for our food, energy, minerals, clean air and water.

  Yet, Northern Ireland continues to fail to meet its local and international commitments to halt biodiversity loss.

  We need a new holistic and cross-sectoral approach to halting biodiversity loss in Northern Ireland, one that moves beyond high-level strategies to include action plans and the necessary resources to make it happen including commitments to ensuring funding for nature conservation to replace existing EU funding programmes such as LIFE+ and INTERREG.

- **Are there specific proposals you wish to submit under any of the themes for our consideration?**

  The DUP should be supporting the relationship between the environment and prosperity and supporting a Natural Capital Index for Northern Ireland to highlight the value we already hold within our own natural environment.

  Another area to include is perhaps the importance of bees – creating areas for pollinators to grow (All Ireland Pollinator Plan), bee-lines and the natural health and wellbeing they promote.