

Draft  
**Environment Strategy**  
for Northern Ireland



**Responses to the Public Consultation  
Summary Report**

**March 2022**

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## 1) Background

On 11 November 2021 the Department of Agriculture Environment & Rural Affairs (DAERA) launched a public consultation on a draft Environment Strategy for Northern Ireland (ESNI). This followed on from the previous public discussion document on a proposed Environment Strategy which closed in February 2020 with over 2,500 responses.

At the end of the consultation period on 18 January 2022, 336 stakeholder responses had been received through the NIDirect Citizen Space portal and via email.

The ESNI team in DAERA analysed these responses to ensure a robust and consistent methodology was applied. The findings of that analysis are outlined in this summary report.

## 2) Questions Posed

The consultation document asked 14 questions:

**Q1a:** Do you agree with Strategic Environmental Outcome (SEO1): 'Excellent air, water, land & neighbourhood quality'?

**Q1b:** Are you content with SEO1 tables (1 to 6)?

**Q2a:** Do you agree with Strategic Environmental Outcome (SEO2): 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'?

**Q2b:** Are you content with SEO2 tables (7 to 12)?

**Q3a:** Do you agree with Strategic Environmental Outcome (SEO3): 'Thriving, resilient & connected nature and wildlife'?

**Q3b:** Are you content with SEO3 tables (13 to 15)?

**Q4a:** Do you agree with Strategic Environmental Outcome (SEO4): 'Sustainable production & consumption on land and at sea'?

**Q4b:** Are you content with SEO4 tables (16 to 24)?

**Q5a:** Do you agree with Strategic Environmental Outcome (SEO5): 'Zero waste & highly developed circular economy'?

**Q5b:** Are you content with SEO5 tables (25 to 27)?

**Q6a:** Do you agree with Strategic Environmental Outcome (SEO6): 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability'?

**Q6b:** Are you content with SEO6 table (28)?

**Q7:** Did you find the Environment Strategy content user friendly and easy to follow?

**Q8:** Do you have any other comments or contributions?

### 3) Responses

Responses were received from individuals, groups and organisations in the following formats:

#### a) Citizen Space

288 responses received via the NIDirect Citizen Space portal contained responses to all 14 questions (as users were required to work their way through each question in turn on the site).

#### b) Emails

48 e-mail responses received were a combination of structured (answering specific (all or some) questions posed) or were unstructured, i.e. not specifying which question(s) the response related to.

Due to the varied nature of these responses (e.g. not all responses answered the 'yes / no' questions), we are unable to publish quantitative statistics in relation to these responses. However, these responses have been included in the detailed qualitative analysis within this report.

#### c) Citizen Space "word limits"

DAERA would like to point out that although a 120 word limit was suggested on the Citizen Space portal (in order to try to keep responses as concise as possible to aid analysis), this did not prevent more than 120 words being submitted to any of the questions posed. The Department took the view that asking responses to be limited to an overall total of nearly 1,700 words was not unreasonable – particularly when several hundred consultation responses were anticipated.

#### **4) Methodology**

This report sets out summary findings, it does not list all comments received as many responses ran to several dozen pages. The ESNI team read and considered all comments before drafting this report.

Responses received were allocated against each of the 14 questions posed. Where the respondent didn't specify which question(s) their response related to, the team allocated the text to the most relevant question(s).

Once all responses were allocated to the 14 questions, analysis commenced on a question by question basis.

It should be noted that the views expressed in this report are those of respondents to the consultation exercise and are not necessarily shared by the Department.

## 5) Findings

### Q1 (a) Do you agree with Strategic Environmental Outcome (SEO1): ‘Excellent air, water, land & neighbourhood quality’?

#### (b) Are you content with SEO1 tables (1 to 6)?

The vast majority of comments (87%) reflected support for this SEO whilst 52% reflected general support for the objectives referenced in the tables. The themes raised are summarised below:

**Targets:** whilst most comments agreed or indicated support for SEO1 and its sentiment, it was noted that with statutory targets for water and air quality expiring soon, damaging levels of air pollution, and no lakes, rivers or coastal waters in good environmental status there is much to do within this SEO. The need for more SMART targets, especially in relation to air and water quality, was a recurring theme in this SEO. Targets were deemed aspirational but lacking in detail and did not go far enough. It was felt that targets should be legally binding and properly enforced. There was concern that NI was falling behind the rest of the UK & Ireland.

**Air Quality:** many respondents commented that SEO1 does not properly reflect the contribution of all sectors to air quality problems and that it seems to be unfairly weighted against agriculture – all of the systemic drivers of pollution (e.g. car dependency, agriculture, water industry) must be directly tackled through cohesive policy actions across the Executive. There were a lot of comments regarding the importance of PM<sub>10</sub> which was not included in the air quality table. Ammonia and Nitrogen emissions were also mentioned as concerns. Some respondents felt that air quality targets should meet WHO guidelines.

The Strategy should address air quality pollution derived from traffic congestion and opportunities to reduce or remove through-traffic using a broader network of Clean Air Zones (also known as Low Emission Zones in London & Scotland) that reduce motorised transport, underpinned by a legal framework that sets minimum standards. This should run alongside a roll-out of ‘School Streets’ (streets closed to motor traffic outside schools) to protect children, who are the most vulnerable to air pollution.

It was felt unacceptable that the ‘current status’ section focuses on ammonia from agriculture yet fails to mention that Greater Belfast breached the EU Air Quality Directive’s annual mean limit value for NO<sub>2</sub> in 2015.

DAERA was asked to consider the development and introduction of a grant scheme for Northern Ireland similar to the DEFRA Air Quality Grant Scheme to better support local air quality management projects, to raise public awareness of air quality matters and to improve ambient air quality.

**Water Quality:** a recurring theme was the issue of the urgent need to tackle the historic and ongoing ‘underinvestment’ in our water and wastewater infrastructure. As the environment doesn’t end at borders – air, water, plants and animals move freely across the arbitrary barrier, catchment management requires cross-border approaches that must be embedded in the Strategy.

As with the air quality comments, many felt that the systemic drivers of water pollution need to be tackled, i.e. agriculture and the water industry; although again some respondents felt that there was an over emphasis on agriculture in this section particularly in relation to the River Basin Management Plan Programme of Measures outlined. Wastewater and drainage investment is important and should be factored in to new developments and all government projects should incorporate SuDS measures. Whilst concerns were raised regarding ammonia, pesticides and fertilizers, many felt that support and collaboration was needed for agriculture to tackle these issues.

It was suggested that the addition of a 'Northern Ireland Blue Carbon Action Plan' would inform how Northern Ireland could help contribute to international targets on the ground and greatly increase the potential for NI seas to help mitigate and adapt to the ever-increasing negative impacts of climate change.

Given that coastal water quality and mari-culture viability are heavily dependent upon land use and land management in surrounding catchments, an evaluation of possible changes in water quality conditions based on climate change risks, and key policy drivers (e.g. tree-planting targets) should be considered to inform future aquaculture in Northern Ireland.

**Local Environment Quality:** respondents felt that there was too much litter and dog fouling, with councils struggling to cope with cleaning outside of town centres and volunteer groups dealing with the increasing problem. Heavier fines and focused TV campaigns were suggested. Importance of personal responsibility referenced and need to target antisocial behaviour like fly-tipping in nature reserves. DAERA should be targeting the "harder to engage" audience.

Dilapidated buildings and neglected sites should be brought back into use (e.g. refurbished as housing or made available as community sites such as allotments). However, any plans for regeneration / refurbishment should factor in biodiversity issues when doing so. Local communities should be engaged in the process and new uses should benefit the local community.

Pesticide use and verge quality should form part of local environmental quality and be linked to a pollinator strategy.

Reference should be made to Community Plans and emerging 'Place Shaping' activities. DAERA should recognise the contribution that these plans can make towards tangible and sustainable implementation of any Strategy.

There is a need for bespoke local solutions and the need to soften town centre environments to make them aesthetically pleasing.

A national programme, supported by government, should be established to attract a network of 'green' volunteers, of all ages, to improve engagement with, and the protection of, our environment.

Local government involvement in a Litter Strategy is vital.



**Land Quality:** some respondents asked why land quality was not explicitly included as one of the tables despite being covered by SEO1. Soil health is important to land quality and it was suggested that this should have a larger emphasis and separated out from land due to its importance (as an important carbon sink and indicator of sustainable land management). Land use policies must enable and incentivise landowners and managers to support biodiversity recovery and climate change action, such as through nature-friendly farming: agriculture covers 75% of Northern Ireland's landmass which represents a huge opportunity to support nature.

**Q2a: Do you agree with Strategic Environmental Outcome (SEO2): 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'?**

**Q2b: Are you content with SEO2 tables (7 to 12)?**

The vast majority of comments (83%) reflected support for this SEO but some felt it was vague and needed more detail. Around 50% of comments reflected general support for the objectives referenced in the tables. The themes raised are summarised below:

**Targets:** comments indicated the need for outcomes and targets to be realistic, evidence based and specific, with tangible, measurable & time-bound results. Targets should be more ambitious and legally binding. There was support for setting short and medium term milestones which were seen as fundamental to the success of the long term targets. Targets and outcomes also need to be adequately monitored and resourced to ensure robust environmental protection.

**Health & Well-being:** the responses universally recognised that having an accessible, clean & healthy environment is vital to the physical and mental health and well-being of all citizens, and that the state of the environment directly impacts on general health and well-being. This links to the need for improved access to Green Spaces so all citizens regardless of location or socio-economic group, have an opportunity to connect with nature. However, the SEO must focus on actions that lead to enabling everyday active travel, not just for leisure / pleasure.

**Green Spaces:** widely acknowledged that time spent outdoors has a significant beneficial impact on general mental and physical health & well-being, not just for individuals but in enhancing a sense of community and civic pride. A key concern is that outdoor spaces must be easily accessible by all and well maintained so both the quantity and quality of green spaces are important. Sites should be rich in nature with native species and diversity of vegetation and accessible by public transport. Planning and development must be done in harmony with nature, Northern Ireland must move to a system wherein wildlife habitats are enhanced rather than harmed or lost. The need to introduce biodiversity net gain in planning decisions was mentioned frequently.

**Access/Pathways:** there were conflicting views on this theme. Some respondents felt much more could be done by private landowners to open up reasonable access to nature for hikers, walkers, climbers, horse riders, mountain bikers and cyclists, and to allow a public right of way. This would result in a connective network of greenways/blueways and community trails which should be developed by councils. Others opposed this and felt there is adequate provision of outdoor spaces with no need to open up private commercial land, that local recreation and life supporting environmental concerns should be kept separate, and that no government funding should be provided to groups who pro-actively work towards increased access as this gives an unbalanced advantage to this group. Several comments focused on the need to have some totally natural/wild areas that would be protected from all access to allow wildlife and biodiversity to thrive.

Difficulties experienced by several groups such as those from lower socio-economic groups, those without transport, those with a disability, and the unemployed mean that they will visit the outdoors less regularly. There is need for more active management of recreation at busy sites, supported by well-designed legislation which balances the

reasonable expectation of the public to have access to hills and countryside with effective protections for landowners whilst some commented that all suitable public land should be available to the public before requesting access to private land and there were concerns over negative impacts as a result of landowners granting access.

There is a need to reallocate road space to make it safer and more comfortable to walk or cycle. Bus corridors must become the norm. There should be protected safe cycle paths, not just lines painted on roads and more Bicycle Plans for other towns and cities not just for Belfast.

Rather than amending current legislation on access, a new Outdoor Recreation Bill should be introduced to support the development of outdoor recreation with a new Outdoor Recreation Strategy being developed in tandem.

**Education/Behavioural Change/Engagement:** there needs to be a behavioural shift and attitude change amongst the public which will require better communication and education if the Strategy is to be delivered. Environmental sustainability needs to be mainstreamed in schools and funded as an integral part of the curriculum at all levels with time spent in nature in all education settings. The Strategy has a responsibility to address the existing gaps in the current curriculum with a greater emphasis on biodiversity and outdoor connection to nature in the next NI Education Review.

Tailored training & support programmes were also flagged up as necessary in key industries such as agriculture, commercial fishing and construction. Ongoing work by the Eco-Schools, Forest Schools, LEAF and Ulster Wildlife, Our Bright Future programmes were referenced and the need for adequate accessible funding for these projects. The necessity for young people to be involved and have a voice in policy making was also referenced. Targets for Carbon Literacy training for young people, teachers and youth leaders were highlighted. Urban dwellers need to be better educated on the challenges within rural areas and in particular the impact of their behaviour on the countryside, nature and farmers, e.g. fly-tipping and littering.

Food production will play a vital role in tackling climate change in the future, and therefore should be included in Eco-Schools or, alternatively, including agriculture as part of the primary school curriculum and encouraging more secondary schools to teach agriculture would provide children and young people with opportunities to learn about, actively engage with, and positively shape the natural environment. DAERA should work with YFCU & UFU Next Generation committee as part of the action championing “a group of ‘30 under 30’ environmental leaders”.

**Finance/Economy:** several comments raised concerns about the cost that will fall on taxpayers to implement the strategy and the need for accountability of any funding spent by the third sector. A few respondents suggested landowners could receive financial incentives for permitting access on private land, enhancing biodiversity, flood protection and carbon sequestration. Others felt that every part of the environment cannot be used for economic or human gain such as gold mining in the Sperrins. Links between a healthy environment and a healthy economy were also referenced, and the need to ensure local housing is affordable to local people even in areas of environmental beauty with high levels of tourism.

**National Parks:** the creation of National Parks in places such as the Mourne, Sperrins, Lough Neagh, the Peatlands, and Antrim Coast & Glens was suggested as a way to protect and monitor the natural environment. The introduction of National Parks should be included as a target as in the rest of the UK, and it was suggested that the Strategy should also set out how the Glover Review is to be implemented in NI.

**Planting:** many respondents felt that more trees, hedgerows and native plants should be planted with planting targets set and monitored. It was commented that NI has the lowest provision of woodland access in the UK. Road verges, public spaces and gardens are important areas for wildlife, and nature recovery networks with no general access can be developed to improve connectivity between habitats and allow nature to recover. This will also bring benefits like flood management along riverbanks. Wildflower spaces were felt to be important to encourage and educate citizens on our native species and biodiversity. Use of pesticides and herbicides should be stopped by public bodies.

**Biodiversity:** the Strategy is seen as an excellent way to protect our natural environment and promote biodiversity. Comments referenced the need for the measuring and recording of biodiversity levels to be increased and take place in a wide variety of habitats not just protected sites, ensuring a fully integrated approach. It was referenced that AONBs have few measures of protection with funding generally dependent on Lottery Heritage Fund, and it was felt strategic funding is needed for AONBs by councils and DAERA. Consideration should be given to giving AONB management plans a statutory basis.

**Landscapes/Seascapes:** comments reflected concerns over degradation and damage to our landscapes, seascapes and areas of natural beauty with the conflict between environmental protection and economic gain highlighted. The development of a Landscape Strategy is welcomed but timescales seen as disappointing. The benefits of protected landscape management should be promoted across Government and should be specifically included in future iterations of any Northern Ireland Programme for Government. Reviews and forward action on land and seascapes should be carried out in harmony with efforts to improve the condition and extent of protected sites, creating wider ecological network recovery across Northern Ireland. When Landscape and Seascape reports are being updated the community should be engaged to raise awareness.

There should be a clear stated intention to engaging with rural and urban communities, creating excitement and awareness around our natural assets, bringing people to land and seascapes, creating access for all, and helping them understand how and why the land/seascapes can be better protected, restored and ultimately improved. Some felt that the marine licencing regime is not protecting our environment and that licences should not be granted to private industry with no proven track record.

**Built / Historic Environment:** the need to recognise the importance of the historic environment and the need for this to be explicitly included in targets and measures was stressed. The aim should be that the historic environment contributes to social, economic and environmental outcomes. Landowners could be incentivised to manage and maintain monuments. It was suggested an asset register could be held by all local councils to monitor the upkeep of our historic environment. The historic environment on farms is a non-renewable resource and an important part of our cultural heritage.

Farmers have a key role in managing and maintaining these landscapes and they also play a valuable role in rural tourism. Payments for historic monuments and traditional buildings should be included in any future funding scheme. All new development should be focussed at sustainable and accessible locations within existing settlements – avoiding sporadic / dispersed development.

**Q3a: Do you agree with Strategic Environmental Outcome (SEO3): 'Thriving, resilient & connected nature and wildlife'?**

**Q3b: Are you content with SEO3 tables (13 to 15)?**

The vast majority of comments (86%) reflected support for this SEO and around 56% of comments reflected general support for the objectives referenced in the tables. The themes raised are summarised below:

**Definition:** In general there was broad agreement and welcome that the subject of nature & wildlife has been treated as a separate objective. It was felt that nature conservation must become a core interest and that biodiversity must be protected, stimulated and in some cases restored on both land and at sea. It was clear that a number of respondents felt passionate that we should not consider ourselves separate from nature or that we are the 'masters of nature' when in fact we are merely an integral part of nature itself.

**Targets:** many positive comments were received however this SEO also generated some criticism specifically that the individual goals contained within were not ambitious enough and there were concerns around lack of detail in the 30/30 target. Many of those voicing criticism felt that in general there needs to be greater vision within the strategy as a whole and that the individual targets need to be more ambitious and it was felt that objectives ran the risk of not being delivered.

**Monitoring:** the progress of the goals and targets must be monitored, robustly evaluated with effective data collection and where possible standardised. They should be legally binding with in-built incentives, especially for landowners, in tandem with such things as appropriate/realistic deterrents and effective enforcement, to enhance their potential success rate because there is a general belief that existing protections are not working. It was also felt that while the total acreage of protected lands and marine areas should be increased the targets and evaluation of such initiatives should be on an all-island and UK-wide basis. Some lamented the absence of National Parks and the lack of an active wildlife restoration programme in Northern Ireland. The Strategy should mandate improved Environmental Reporting, especially in relation to habitat condition.

**Trees:** planting of native, non-invasive, broadleaf/deciduous species was seen by many as an 'easy win' in restoring or enhancing biodiversity. Where appropriate, land should be allowed to develop into woodland naturally without interference to maximise diversity and resilience. A plan to 're-wild' much of our landscape should be developed. Whilst the increasing of the target was proposed it should be approached strategically and often came with the proviso that in the rush to plant more trees this laudable exercise should not be to the detriment of other naturally occurring land uses namely, wetlands, peatlands, marches, estuaries etc.

**Biodiversity:** we should look beyond the protected 30% of land & sea and explore ambitious and ecologically robust management of the other 70%. The quantity of protected areas must not be prioritised over quality. The target to protect 30% of land should be a floor not a ceiling, given long-term legal protection, and must be cohesively developed with delivery mechanisms such as implementing the third SPA review, nature friendly farming and incentives. A nature-based solutions plan should be delivered using a Nature for Climate Fund through private funding mechanisms and Green Finance. It



was suggested that DAERA commissions a Dasgupta-style 'Economics of Biodiversity Review' for NI. Nature must be restored coherently on land and at sea both within and outside of protected sites, with protected sites effectively managed and connected as core sites in a landscape-scale Nature Recovery Network, and supported by robust monitoring. It is felt that there is a need for concerted and urgent action around planning – at a minimum to actively enforce planning conditions that are made with the objective of protecting nature or preserving biodiversity. The absence of any targets in relation to tackling wildlife crime were also highlighted. Some commented that Northern Ireland is the only part of the UK without any active restoration programmes.

**Wetlands:** the threat to and destruction of inland wetlands by building development, the expansion of agricultural land or drainage schemes etc. was an area of concern voiced by many. It was felt that the priceless contribution wetlands make to local biodiversity is severely underestimated, that these habitats deserve greater exposure as 'biodiverse hotspots' through education, and need urgent protection.

**Agriculture:** understandably, as the agricultural sector has perhaps the greatest impact on local nature and wildlife, many respondents touched on the subject of farming and farming practices in their comments. Some respondents felt that changes in land use are required. Many felt the farming sector and landowners are perhaps best placed to influence and change land use patterns such as through nature-friendly farming which represents a huge opportunity to support nature while encouraging sustainable local healthy food production.

Concerns over hedgerow destruction, habitat loss, fracking and sand-removal were voiced, with many suggesting that in future agriculture must be more nature-friendly. Issues such as outflow discharge management, reduced pesticide use and the inclusion of initiatives such as grant-aided double-fencing, wildlife corridors and re-wilding were also highlighted. Species & habitat restoration could take many years and may require generational change on some farms. Adequate long term funding commitments will be needed. A specific percentage should be set for biodiversity-rich habitat for all farms and farmers supported to deliver this via the Single Farm Payment.

**Natural Capital & Integration:** the inclusion of the concept of Natural Capital was welcomed by some provided it is managed correctly while others felt such a title is unhelpful as it merely commodifies the local environment. It was felt that as well as being physically connected, through for example, wildlife corridors, a more integrated approach at a departmental level should be adopted when discussing the protection and safeguarding of nature and our role therein. Connections should be made and strengthened between the agricultural sector, the environment, local planning, construction, woodland management, marine/water management, waste planning etc. in protecting the local environment and safeguarding local biodiversity/geodiversity.

Previous initiatives, policies and programmes to protect local nature and wildlife were often perceived as being approached and undertaken in a disjointed way. For future initiatives to be successful many felt such programmes need to not only be integrated between various government departments and agencies but they should include partnerships with schools, local communities, NGOs and other groupings. The value of outdoor recreation benefits and access to quality green and blue space should be included within a Natural Capital accounting framework. As Natural Capital is now an integral element of Treasury guidelines in Great Britain, guiding decision making and

investment, respondents would like to see a similar approach adopted in Northern Ireland.

**Marine:** many respondents were keen to point out that the case for ‘thriving, resilient and connected nature & wildlife’ must not be limited to land-based nature and wildlife but that the protection of our seas, seabirds and all marine-life must also be a priority with some respondents questioning whether the 30% of land and water will be managed and protected effectively. Others highlighted the unique problems facing the marine environment – citing issues including effluent discharge, raw sewage, bottom trawling, algal blooms, ballast-water invasive species and shoreline management. Some suggested that a strategic approach to shoreline management is urgently needed to address the challenges of marine flooding and erosion.

**Designated areas:** concern was expressed for the various designated protected areas including: AONB, ASSI, MPAs and this concern was extended to any future designations such as nature islands and nature corridors. There was solid support for the expansion of all such areas, including the suggestion of the establishment of human-free areas provided all such areas are effectively managed and protected. Some felt that lands should be protected both ‘within and without’ designated protective zones.

Farmers view formal designations of more land as having a landowner imposed upon them and therefore being counterproductive. DAERA must work in true partnership with those managing the land in designated sites. DAERA must consider a more appropriate form of long-term compensation than agri-environment schemes for land which is designated.

Some commented that the Strategy has too little focus on species action with established ecological theory highlighting the role of certain species as ecosystem engineers. Many core sites for nature remain undesignated – despite a clear mandate. It was commented that the timeframe for publication of site condition assessments needs to be included as a target.

**Human Health:** a number of respondents highlighted the connection between a thriving natural environment and human health. Human interaction impacts so directly and indirectly on nature that many felt that our behaviour, even the way we spend our recreation time amidst nature, needs re-prioritised and needs to change.

**Miscellaneous:** a number of respondents were forthright in their opposition to deforestation, intensive farming, fracking, gas caverns, private and public use of pesticides, fossil fuels, gold-mining, wind-turbines, marine licenses, light and noise pollution. Sanctions for environmental crime, including habitat destruction, should be strengthened and implemented, based on the polluter pays principle.



**Q4a: Do you agree with Strategic Environmental Outcome (SEO4): 'Sustainable production & consumption on land and at sea'?**

**Q4b: Are you content with SEO4 tables (16 to 24)?**

The vast majority of comments (82%) reflected support for this SEO and around 54% of comments reflected general support for the objectives referenced in the tables. The themes raised are summarised below:

**Targets/Ambition:** many responses mentioned that targets needed to be SMART in this SEO and did not go far enough. The perceived lack of ambition was particularly apparent for the sections relating to Agricultural Policy, Energy and Single Use Plastics. Indeed, comments also went further to state that targets, actions, visions and outcomes all needed to be improved and be more ambitious to evoke any real change or consequence.

**Sustainability:** there is a distinct theme running through the majority of the responses that touches on sustainability. Many respondents were concerned about sustainable agriculture and nature friendly farming not being prominently featured in the strategy. In addition it was felt that the commitment to consult on a Future Agricultural Policy simply does not go far enough. Other respondents provided detailed responses which outlined innovative ideas for improving environmental sustainability but these are likely best left to being brought forward as policy measures or initiatives rather than for inclusion in this strategy.

Sustainability of resources also came up frequently in responses to this question. Comments ranged from ensuring targets set are aligned with the rest of the UK to highlighting a need to fundamentally reduce consumption of resources across all sectors. Many of the comments called for more to be included on resource efficiency with clear indicators of how this would be achieved.

**Single Use Plastics:** due to the controversial nature of this topic and the high level of public awareness around SUPs, it is not surprising that this was mentioned on so many occasions, especially around producers taking more responsibility to use packaging that is environmentally friendly. Responses generally called for more targeted actions with stronger focus on SUP bans to be included. Some comments also referred to increasing recycling and ensuring a level playing field across the UK for the introduction of EPR and DRS schemes, whilst some felt that the introduction of a DRS should be a digital solution. Any NI DRS should have a high degree of compatibility with any scheme implemented in Ireland, to reflect the nature of integrated supply chains and a shared consumer marketplace across both jurisdictions.

On several occasions, respondents mentioned the need for NI to immediately ban the 10 most commonly littered SUP items, and many said that we need to go much further, banning SUP items altogether. Some comments, presumably from industry, diverged from the consensus on bans, preferring to support upcoming schemes and disagreed with the option of outright bans on items as for instance, plastic food packaging can extend the shelf life of products and therefore plans to tackle SUPs must not result in an increase in food waste. Finally, several of the comments pointed out that the NDNA commitment to develop a plan to eliminate plastic pollution is not mentioned in the strategy. The increase in the carrier bag levy was welcomed.

**Energy/Renewables:** many of the comments referred to the need for legislation to be brought forward to ensure the Energy Strategy can be fully implemented. Other comments referenced the overall need for a better infrastructure and investment for renewables. There were several comments regarding the affordability of energy and outlining the need to improve the infrastructure of EV charging points, both for public and home use. There were a few comments referring to heat pumps and that NI should be looking into the provision of grants to help people install these. It was pointed out that renewables are not environmentally benign and NI should be exploring geothermal energy sources.

Consideration should be given to each form of renewable energy development within the Northern Ireland context in order to discourage developments that require the importation of raw materials or the movement, processing or handling of crops or materials which in themselves require large fossil fuel inputs. Many touched on the potential to help decarbonise the gas grid by using biogas as a transport fuel and providing grants for biogas and electric vehicles. The NI land-based sector can play a central role in future energy strategy and farmers must be considered a key stakeholder.

**Agriculture:** there were many and varied comments in relation to agriculture. It was felt that there is a specific need for an NI Agriculture Act whilst farmers must be supported to make more sustainable choices. Low Carbon farming practices should be encouraged as part of future sustainable farming schemes as farming and land management can provide the solutions to many problems, through the implementation of nature friendly farming practices that will ensure a healthy, wildlife-rich environment. Some respondents were concerned with an Agricultural Framework that references an increase in productivity and profits, with no *strong* reference to more environmentally responsible practices. The Strategy should identify key areas of linkage with the Future Agricultural Framework.

**Antimicrobial & Disinfectant Contamination:** the future vision/outcome is too focused on agriculture without any mention of other sectors, e.g. domestic pets (where anti-microbial usage is very high) and human health. Farmers must continue to have access to a range of products in order to be able to treat animals with the correct product in a timely fashion.

**Other Comments:** without doubt, some of the most negative comments received were around the use of the words “environmentally benign”. The general consensus was that this was a poor choice of words to describe actions under this SEO. There is no reference to the NI Food Strategy Framework anywhere in the document. Several responses referenced the need for a “joined up” approach across government, industry and ensuring all sectors are included. Very specific examples were raised in relation to fisheries, most led back to the use of the term “environmentally benign”. Some mentioned the upcoming Marine Plan saying that sustainability and ethically used seas must be at the heart of it.

**Q5a: Do you agree with Strategic Environmental Outcome (SEO5): 'Zero waste & highly developed circular economy'?**

**Q5b: Are you content with SEO5 tables (25 to 27)?**

The vast majority of comments (87%) reflected support for this SEO and around 62% of comments reflected general support for the objectives referenced in the tables. The themes raised are summarised below:

**Targets:** a common theme was the need for targets to be SMART(er), much more ambitious, legally binding and with particular emphasis on monitoring and evaluation. There is a general theme in all of the comments here that targets are lacklustre and carry no sense of urgency.

**Sustainability:** sustainability of resources was a common theme with a number of respondents believing the culture of over-consumption and consumerism should be tackled through education and behaviour change. Excessive resource use and the harm already caused by plastic pollution need to be addressed according to some while others believe that increased recycling (including food waste) and an increased focus on all single use items are required.

A number of respondents believe initiatives targeting the design, life-span, recyclability and repair of products are essential while some believe that government must lead the way in practice by implementing a green procurement policy across the public sector. Reducing the carbon footprint of the built environment will also play a key role in our future sustainability, according to a number of contributors, with an increased focus on retention and repair over new build in construction.

**Waste/Circular Economy/Recycling:** we should seek to ensure that Northern Ireland has adequate means to utilise its own waste and minimise the need for fossil fuel consumption in the transportation and handling of recyclable materials and non-recyclable materials. The move towards a circular economy for waste and resources was strongly welcomed with the potential to have a very positive impact in the context of carbon emissions. Some suggest that manufacturers and producers should be incentivised to transition to a circular economy while others suggest that a carbon tax should be levied to encourage the shift. Some felt that there is not enough emphasis on the carbon benefits of CE implementation as is the case in other UK regions.

There is a need for various forms of energy recovery (e.g. thermal/biogas/electricity) infrastructure to be developed, with existing infrastructure to be complemented by new technologies such as hydrogen, district heating and carbon capture and storage infrastructure. Additional re-processing facilities for recyclables would be welcome.

As well as seeking to increase collaboration across central government, there should also be a drive for more collaboration with industry as often it is industry who are best placed to bring forward circular economy solutions. Agriculture must also be considered a key part of a circular economy and should be involved in any stakeholder discussions. Sequential progress toward a circular economy should be pursued with ongoing learning being applied and shared to drive further opportunities. The waste sector manages one part of the circle that makes up the Circular Economy and in order to complete the circle, measures are needed that will lead to quicker and more consistent

end of waste decisions from the regulator. To deliver resource efficiency and a circular economy, on-going research & development is needed. DAERA must set out a clear action plan to reduce waste to landfill to less than 10% by 2035. Any initiatives or further restrictions on certain wastes must also consider the potential implication for fly-tipping.

More should be done to educate householders to recycle/reuse and to encourage them to properly sort their household waste. It is essential that a positive public attitude is formed and everyone recognises their responsibility.

**Agriculture:** the introduction of a sustainable agricultural plan and a move towards greener agricultural practices also feature prominently. Suggestions to reduce the negative environmental impacts of agriculture include minimising discharge, utilising/re-purposing agri-wastes, and opportunities for minimising waste in primary production. It was noted that the absence of a circular economy plan to include agriculture is disappointing. Under the guise 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 and materials

**Fly-Tipping & Littering:** respondents feel that this issue needs to be treated on a much more serious level – stronger enforcement, stiffer penalties and increased education / behaviour change are required with some commenting that the Fly-Tipping Protocol must be agreed as a matter of urgency. The removal & disposal of fly-tipped waste should be the responsibility of local authorities, regardless of where it is dumped.

The Fly-tipping Protocol could be further developed to ensure that the demarcation of roles between councils and NIEA is clearly defined. The aspiration to have a collective data capture approach will require resources to collect, collate and review data to meet the Protocol requirements and this will require DAERA funding.

The Waste & Contaminated Land Amendment Act (NI) 2011 is still awaiting commencement and there isn't a clear approach to fly-tipping across all councils. The reasons for this delay must be understood and lessons applied to enable more expedient implementation of future environmental legislation.

**Q6a: Do you agree with Strategic Environmental Outcome (SEO6): 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability'?**

**Q6b: Are you content with SEO6 table (28)?**

69% of respondents agreed with this SEO and around 55% of comments reflected general support for the objectives referenced in the tables.

**Targets:** there is felt to be a lack of definite targets and delivery timelines, further detail on requirements and targets should be produced to enable mitigation towards net zero, and to detail how Northern Ireland will contribute towards UK Net Zero.

**Climate legislation:** the urgent need for NI climate legislation was a key theme here but there was concern about being asked to respond in the absence of an agreed target for NI greenhouse gas emissions. On the one hand there were those who felt that there was no reason why Northern Ireland couldn't establish its own targets and take a more ambitious approach in making a fair contribution to delivering the Paris Agreement commitment. These respondents commented that an immediate and rapid programme of decarbonisation is needed. There were others however who commented that any targets set must be based on robust scientific evidence which takes into account Northern Ireland's unique circumstances. An ambitious climate action plan should be developed and the recommendations from the Tyndall Centre for Climate Change Research should also be considered.

**Climate / Biodiversity:** it was frequently mentioned that climate change and biodiversity are inextricably linked but that it is important that the urgent actions taken to address climate change should not increase the threat to biodiversity. These twin threats must be tackled together if we're to improve climate resilience and adaptability. Habitat restoration must address the biodiversity crisis and support our response to climate change. Key habitats play an exceptional role in carbon sequestration and also in reducing climate change impacts such as flooding and erosion. Many of these are in our marine environment, which is being treated with neglect by allowing it to be exposed to pollution (e.g., mudflats, saltmarsh, seagrass, and shellfish reefs).

There needs to be more recognition given to the importance of livestock systems in supporting a rich biodiversity alongside building soil health to capture carbon. This has not been addressed rationally and is an important area to ensure that farmers are recognised for their contribution to improved mitigation against climate change instead of being blamed for greenhouse gas emissions.

**Renewables:** switch to renewable energy as soon as possible and reduce emissions to zero before the target of 2050. Energy security, supply and dependence represents one of our biggest challenges over the next 30 years but also a major opportunity. A transition to net zero will allow us to build a new economic model focused on green growth, climate resilience and improving our quality of life. It will be essential to ensure strong links between the Environment, Energy and Green Growth Strategies. All share common aims to support a transition to a low carbon society and encourage renewable and green growth sectors.

**Forestry:** there were comments that Northern Ireland's fair contribution to climate change mitigation should be via its deep peat, much of which is under forestry and not acting as the carbon sink it has the potential to. Drastic action should be undertaken to reverse this policy and bring it in line with the rest of the UK so no further replanting occurs in deep peat and activities are funded to restore the bogs. The planting of native trees and protecting and restoring woodland ecosystems is one of the most effective ways of addressing these crises together.

**Grants / Subsidies:** the banning of diesel vehicles would prove very difficult for low income / agricultural owners so there is a need for an incentive scheme to reduce cost of replacement vehicles. Solar panel grant schemes should be reinstated and double glazing grants for windows and doors, reduced cost / grant for building insulation promoting energy efficiency. Grants and subsidies should be introduced to promote renewable technologies and energy efficient measures to incentivise uptake in residential settings as well as SMEs.

**Just Transition:** there should be an explicit action to develop just transition plans to support the transition to a net zero economy in a socially just way meaning we reduce our emissions and respond to climate change, our journey is fair and creates a better future for everyone – regardless of where they live, what they do, and who they are.

**Sustainability:** there should be a focus on us all using less in the first place, and re-educating away from constant consumption. We should be reducing emissions associated with imported products. There should be no outsourcing environmental footprints to other countries – more local sustainable production is key. We must ensure that NI is resilient to future impacts of climate change through adaptation measures. This should include 'offsets' – as long as there are no offsets they simply don't work.

**Built / Historic Environment:** we cannot meet our targets if we do not tackle carbon emissions in our existing building stock. An open and transparent policy discussion is required on the optimum approach to require new homes to be net zero carbon as rapidly as possible. Together with the construction sector, the built environment is the third biggest carbon emitting sector in the UK. The historic environment is part of the solution to reducing these carbon emissions by reusing historic buildings (and responsibly refurbishing them), rather than demolishing and building new.

**Circular Economy:** Circular Economy and Resource Efficiency thinking and approaches should be adopted as key climate mitigation policy tools, particularly relating to waste management and achieving zero waste. All NI public sector funding programmes should contribute to delivery of national net zero targets (reducing carbon emissions, more efficient use of resources within a circular economy; and creation of green jobs) in accordance with sector climate action plans. Green procurement could also make a significant contribution to this agenda.



## **Q7: Did you find Environment Strategy content user friendly and easy to follow?**

62% of respondents found the content user friendly and easy to follow.

Positive comments can be summarised as follows:

- format was helpful for organisations wishing to include "environment" in their own strategy;
- written in simple language and didn't cover any particularly complex issues;
- well laid out with a good mix of text and images;
- very basic but a start;
- colourful and the use of symbols demonstrating relationships between SEOs and across UN Sustainable Development Goals helps to demonstrate the synergy between all the SEOs/factors that are noted within;
- easy to follow (but a bit light on detail);
- easy to digest and good use of infographics;
- well laid out with the text preceding the tables setting the scene;
- full version was well laid out and organised clearly into tables to tackle each SEO;
- easy to find topics rather than having to wade through reams and reams of text as is the case with a lot of government documents;
- great to see diagrams and not just lots of words;
- very comprehensive, clear, insightful and beautifully presented document;
- outcome based approach is welcome and the strategic environmental outcomes set out have good reach.

Comments which did not find the document user friendly and easy to follow can be summarised as follows:

- overly long, fragmented, lacked focus and was complicated and too wordy;
- format of the questions was inaccessible for everyday citizens due to having to read through the document in its entirety;
- some aspects too technical for the general public to understand the implications;
- designed to put the public off providing a response thereby evading proper scrutiny of the strategy;
- easy read document did not contain all the necessary information to be able to respond;

- not accessible enough – suggestions included providing online videos, adapting consultations to appeal to young people and the general public;
- a balance was required on content so as not to tip too much in favour of accessibility;
- does not provide a general overview of the framework nor how the Strategy will be implemented;
- format is confusing and despite most of the outcomes being interrelated, interdependencies are not obviously linked across sections;
- heavy use of acronyms;
- reliance on other strategies and plans that the reader cannot readily access.



## **Q8: Do you have any other comments or contributions?**

There were over 200 responses to this question. Many of the comments related to targets and the perceived lack of ambition in the Strategy and other areas which have already been covered in detail in the summaries of questions 1 to 6. Summarised here are other comments that did not necessarily fit elsewhere but were frequently made by various respondents:

- if the Strategy contributes to joined-up government, with departments and bodies working more coherently, it will deliver a positive outcome;
- adequate resourcing is essential to implement significant environmental improvement and this is likely to require innovative financing models as well as a financial commitment from the Executive;
- focus should be on providing resources to effectively deliver improvements from the 'bottom up' – working with local communities, farmers and businesses;
- Strategy must not make businesses uncompetitive as this would only export our environmental problems elsewhere;
- keep it realistic and affordable;
- Strategy should have a dedicated website which the public can monitor;
- should include a summary table of all targets and actions detailing their delivery pathways, resourcing needs, commitments and opportunities;
- environmental governance needs to be explicitly covered – the issue of an Independent Environmental Protection Agency was frequently raised;
- Brexit context needs to be more clearly signposted – we need to replicate the funding for environmental protections and research that we've lost;
- pollinators are a key issue that have been badly affected yet only mentioned once;
- agriculture should be efficient, reduce farming outputs and in particular the level of livestock rather than simply focusing on profits and productivity;
- disappointing to note lack of commitments from across the breadth of government departments in the actions;
- linkage should be made to the draft Budget and an assessment of the impact of the proposed allocations on delivery of future environmental targets;
- DAERA should avail of professional scientific expertise outside of AFBI / eNGOs;
- the natural world is seen largely through the lens of economic development and economic gains rather than for its intrinsic value;
- the most positive section is the Minister's foreword;

- the economic impact of the Strategy would need to be determined to ensure there is no new or additional burden on ratepayers;
- concerns that current economic system will not solve environmental issues and that a different form of participative economy is the way forward for sustainability;
- Strategy must be based on the most up-to-date evidence, not ideology;
- encourage more public engagement and actively seek to put the public's opinion at the forefront of future initiatives;
- need to sustain young people's involvement with the Strategy, giving them a seat at the table when it comes to monitoring and evaluation of progress;
- a new Northern Ireland Environment Bill is needed to underpin the Strategy;
- a dedicated Department of the Environment is needed;
- take an integrated, holistic, coherent & strategic approach to environmental protection across island of Ireland, in conjunction with counterparts in Ireland;
- the Strategy should be developed using a co-design approach where a broad partnership is developed which can ensure that everyone with a part to play is involved more actively in the design and delivery of policy;
- for a high-level Strategy, some elements are detailed / specific which is concerning;
- failure to recognise the improvements that have been made by the agricultural sector in recent years. Farmers must be genuinely part of the process and properly recognised and valued for the work that they do;
- for an issue of such fundamental importance, there is a disturbing lack of connection between the state and the people;
- greater controls on imported products from areas where environmental standards are lower, this equivalence argument should be made to the UK Government, particularly in respect to trade deals;
- DAERA should implement the Small & Micro Business Impact Test (SAMBIT) so that businesses can play their full part;
- DAERA should establish an Environment / Climate Change Stakeholder Group to include business;
- DAERA should recognise positive impact of sustainable shooting as it respects quarry species & their habitats; avoids excessive consumption; promotes greater understanding of environment; complies with law; improves the health & well-being of participants; and provides food, social & economic benefits to wider community.

## 6) Next Steps

### **Monitoring**

DAERA is considering the best means of ensuring effective governance and oversight of the delivery of the actions set out in the final strategy and the necessary resources to achieve this.

### **Targets**

After reviewing the responses to the draft Environment Strategy public consultation and also taking into consideration comments received from the AERA Committee, DAERA has revisited and strengthened many of the key actions and targets previously contained in the Strategy. The final Strategy will require Executive sign-off which will only be possible whenever a new Executive is formed following the Assembly election.

### **Forthcoming Key Strategies / Policies**

DAERA is also in the process of producing a number of other key strategies and policies on significant matters such as clean air, peatlands, biodiversity, future agricultural policy and ammonia. These policy specific strategies will deliver more detail in relation to key targets and actions, and these in turn will be reflected in future revisions of the Environment Strategy, as the Executive seeks to enable all of us to play our part in the global efforts to urgently address the substantial climate and biodiversity crises.

### **Environmental Improvement Plan (EIP)**

DAERA intends to adopt the finalised Environment Strategy as Northern Ireland's first EIP under the Environment Act 2021. The first EIP must be published within 12 months of the relevant requirements becoming law, i.e. by 25 July 2023.

An EIP is defined in the Act as: *“a plan for significantly improving the natural environment”*. It is not enough that it protects the environment, it must be designed to make it better and DAERA is required to set out the steps NI departments intend to take to improve the environment. The plan may also set out steps to improve people's enjoyment of the natural environment.

DAERA must publish annual progress reports and the EIP must be reviewed (and if necessary, revised) within 5 years of its publication. DAERA must also obtain (and publish) appropriate data in order to monitor progress on environmental improvement. As such, the Strategy will be a living document, subject to regular review / revision, and to independent scrutiny by the Office for Environmental Protection (OEP), to ensure that all NI departments are taking the necessary steps to improve our environment.

The OEP is required to monitor progress against the EIP and publish annual reports within 6 months of DAERA's progress report. It may include consideration of how progress could be improved, and whether the data published by DAERA is adequate.

DAERA must then respond to the OEP's annual report, addressing any recommendations made. This will deliver a new robust and independent mechanism to monitor environmental improvement, with reports published and laid before the NI Assembly.