

The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, WWF Northern Ireland, National Trust, Friends of the Earth, Irish Whale and Dolphin Group and Northern Ireland Environment Link. The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

Dear Sir/Madam,

The NIMTF welcomes the opportunity to respond to the DEFRA consultation on environmental principles and accountability for the environment. The NIMTF has contributed to and supports the response to this consultation submitted by Nature Matters Northern Ireland.

The NIMTF consider that the most appropriate option for the future of environmental governance is to develop a **co-designed and managed UK wide body**, which has a decentralised office in Northern Ireland. The use of a **common framework** across the devolved administrations should be applied in relation to governance, targets, principles, enforcement and regulation. The new body should have a mandate for furthering **North-South cooperation** so that the island of Ireland is treated as a single biogeographic unit. The lack of North-South engagement around **the cross-border Loughs** (Foyle and Carlingford) is a critical gap in Northern Ireland and therefore the UK's environmental governance. Without engagement on this issue, there is a risk that any attempted implementation of a watchdog and environmental governance framework will fail as a result of unresolved issues associated with the current and future governance within the Loughs. There is a significant risk to Northern Ireland's environment if a framework for environmental governance is not developed specifically for Northern Ireland.

The watchdog body that is developed must have **legal weight**. Proposals such as issuing advisory notices are not an adequate enforcement tool. Any lack of access to legal proceedings creates a gap between existing and future environmental governance arrangements and the NIMTF considers **strong enforcement** to be critical in holding damaging activities and those associated with it to account while instilling a sense of responsibility in the protection of our environment. Similarly, the NIMTF believe that the **environmental principles set out should be included in legislation**, to give them legal weight. The subsequent policy statements should then give effect to these principles. The NIMTF has concerns that there may be **conflict of policy statements** from various departments and indeed conflict within new legislation. It is crucial that within the policy statements, the roles and responsibilities of all actors e.g. Government departments, local councils etc. are set out. This will act as a **conflict resolution mechanism** and avoid potential future litigation, as has been seen in many cases across the world.

With regard to environmental policy, the NIMTF believes that the use of a **tiered policy approach** may be the most effective for dealing with the range of environmental matters that must be considered. For example, sitting under this legislation, the Government should include policy statements in relation to climate change (a noted gap within this consultation), coastal policy statements etc. By moving towards a tiered approach, a more holistic form of governance can be created and framed within this future Bill.

The NIMTF also wishes to raise concerns that to date, Northern Ireland has not had an independent environment regulator or **marine management organisation** (or equivalent). It is critical that any future body has adequate resourcing and expertise to advise on and enforce marine environment matters. To end, the NIMTF wish to note that any new body that is created, must be **truly independent** in order to have the ability to hold the Government to account for failing to meet adequate environmental standards.

This response was compiled by the Northern Ireland Marine Task Force Officer Ellen MacMahon and the NIMTF team. If you wish to discuss any of our points raised in more detail, please contact Ellen MacMahon at: ellen.macmahon@ulsterwildlife.org