

NIMTF Response to the DAERA Environment Strategy for Northern Ireland - Public Discussion Document

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, Marine Conservation Society, Keep Northern Ireland Beautiful, National Trust, Friends of the Earth, Irish Whale and Dolphin Group and Northern Ireland Environment Link. Through the combined membership of our organisations, NIMTF has the support of approximately 100,000 local people. We are working towards, healthy, productive and resilient seas for Northern Ireland.

We welcome the proposed plans to develop an all encompassing environment strategy (herein 'the Strategy') for Northern Ireland and welcome the process of early engagement. Given the wide reaching and complex nature of the environment, ongoing engagement must continue as the strategy is developed further. We look forward to, and welcome, the opportunity to be involved in that work.

We support the Northern Ireland Environment Link response to the public discussion document. The purpose of our response is to address the marine and coastal elements of the paper.

NIMTF has engaged with our members and wider stakeholders in compiling this response, by way of a workshop in August 2019. During the workshop, stakeholders explored initial thoughts around the themes contained in the Environment Strategy discussion document and these are contained within our response.

In order for the Strategy to realise the system wide change that is needed, adequate resources must be allocated to its implementation, monitoring and review. While a lack of resources is a barrier that must be overcome, it must also not be used as a justification for a lack of ambition within the Strategy.

Q1: Do you agree that the Environment Strategy should sit alongside existing Executive-endorsed strategies, such as the Sustainable Development, Public Health and Economic Strategies?

Yes

No

Comments:

Yes - **it is crucial that the Strategy sits alongside existing Executive-endorsed strategies**, given the cross-cutting nature of the environment. However, the lack of an Executive (as per date of submission) must not be a reason for not progressing the implementation of an effective Environment Strategy for Northern Ireland.

We are in a climate and biodiversity crisis as recently evidenced by:

- The Intergovernmental Science-Policy Platform on Biodiversity and Ecosystems (IPBES) Global Assessment¹ - ***“66% of the marine environment have been significantly altered by human actions”***.
- UK Marine Strategy Assessment Part One² - **11 out of 15 indicators for healthy seas are failing to be met.**
- The State of Nature 2019 Report³ - ***“Of 2,450 species in Northern Ireland that have been assessed using IUCN Regional Red List criteria, 11% have been classified as threatened with extinction from Ireland as a whole”***.
- UK Parliament and 3 councils in Northern Ireland to date have declared a climate emergency⁴.
- The Intergovernmental Panel on Climate Change (IPCC) Special Report on the Ocean and Cryosphere in a Changing Climate⁵ - ***“Over the 21st century, the ocean is projected to transition to unprecedented conditions with increased temperatures (virtually certain)...”***

The environment is the foundation of a healthy and sustainable society and as stated in the Environment Strategy discussion document *“the environment is all-encompassing and in good and healthy condition can contribute to many, if not all, of the PfG*

¹ https://ipbes.net/sites/default/files/downloads/spm_unedited_advance_for_posting_htn.pdf

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/84123/3/marine-strategy-part1-summary-of-responses.pdf

³ <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>

⁴ <https://www.bbc.co.uk/news/uk-northern-ireland-49907596>

⁵ https://www.ipcc.ch/site/assets/uploads/sites/3/2019/09/SROCC_SPM_HeadlineStatements.pdf

outcomes, however if this is to be realised ambitious and decisive action must be taken to counter nature's deterioration”.

The environment should be at the heart of decision making within all departments and across all public bodies and to support that, so too should the Environment Strategy. Often, decisions that impact on the environment are made within departments that do not have a specific environmental remit; a key element of sustainable development is Environmental Policy Integration (EPI), where environmental policies are integrated across various government departments. If this Strategy is to deliver the system wide change that is needed, then it should aim to increase the levels of EPI across government departments and public bodies. To assist with increasing the levels of EPI across government departments and public bodies, **we propose that a cross departmental working group is established.**

The Environment Strategy for Northern Ireland is an opportunity to create the system wide change that is needed to restore our environment. If Northern Ireland is to have a *‘leadership role in demonstrating to the rest of the world what is possible’*, then the effective implementation of an ambitious, binding and well resourced strategy is a major opportunity to do so.

In addition to the above, NIMTF supports the Strategy being based on the principles which the Northern Ireland Environment Link has included in their response:

The Strategy 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 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.
- Have statutory footing and binding targets that are clear, measurable and 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.
- 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.

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?

We agree that these broad environmental areas are appropriate for the Environment Strategy and welcome the inclusion of the marine environment as an area, given the importance of our seas and coasts to Northern Ireland. However, **the theme 'Marine Environment' should be changed to 'Marine and Coastal Environment'**. The themes of marine and coast are distinct, with their own set of issues and management challenges despite the overlap and intrinsic nature of the two, and the Strategy should be changed to reflect this. It is also important to define the coastal environment.

Other Comments:

Within the theme 'Marine and Coastal Environment', NIMTF would like to see the **implementation of existing actions / commitments** such as:

- A specific goal for the marine environment within the Strategy, supported by the UK Marine Policy Statement vision for “clean, healthy, safe and biologically diverse oceans and seas”;
- The achievement of 'Good Environmental Status' for UK seas;
- Integration of existing international, EU and domestic marine goals and targets;
- All marine protected areas in NI are under favourable management;
- The implementation of an ecosystem based marine plan; and

Commitments to new ambitious actions such as:

- The use of legally binding SMART targets and indicators (within the Strategy);
- Halt further decline and commit to the recovery of populations of seabirds (e.g. develop a Seabird Recovery Plan for NI), cetaceans, fish, elasmobranchs and other species included on the NI Priority Species list;
- Restore and manage fragile and vulnerable habitats which have been damaged by human activity;
- Implement an ecosystem-based approach to fisheries management;
- Commit to reduce levels of litter and microplastics in the marine environment with action at the sources and sinks;

- Recognise and better integrate land - sea policy (such as the WFD and MSFD);
- Acknowledge (within the Strategy) the important role of our marine and coastal habitats and species as a nature based solution to climate change; for example seagrass meadows and salt marshes and their ability to sequester carbon;
- Implement appropriate adaptation measures to address the effects of climate change on our marine environment; such as ensuring our network of MPAs is climate smart;
- Implement new legislation for Coastal Change Management;
- Establish a strategic monitoring and data gathering programme on shoreline behaviour (Coastal erosion & Coastal Flood Risk) for the NI coast; and
- Implement new outdoor recreation legislation (with specific reference to the marine and coastal environments).

It is crucial that the above actions are adequately resourced, in order for the Strategy to seize the opportunity presented, and to realise the ambition and action that is urgently required.

Given the wealth of international and EU marine commitments, **policy integration must be a critical component of the Environment Strategy for NI**. There has been significant effort in compiling data, criteria, targets and indicators for the UK Marine Strategy, and as such, these efforts should not be duplicated. Instead, the targets and indicators contained within the UK Marine Strategy should be integrated within the marine section of the Environment Strategy for NI. However, the existing and proposed indicators within part one of the UK Marine Strategy (2019) must be more ambitious and truly SMART in order to halt and reverse the evident decline in the health of our seas. For example, through the Environment Links UK, we have called for targets under Descriptors 1, 4 and 6 (cetaceans, seals, birds, fish, pelagic habitats, benthic habitats & food webs) that aim for “no significant decrease” to key biodiversity areas to be amended to call for “a statistically significant increase”, while the reverse should be the case for key pressure targets.

The Environment Strategy should include obligations to meet SDG 14 and its associated targets⁶.

⁶ <https://sustainabledevelopment.un.org/sdg14>

Coastal Environment

Coastal change management and adaptation to the impacts from climate change need a better policy framework than currently exists and new legislation needs to be developed to properly reflect the range of challenges the coast is facing. It is important that this is addressed in a cross departmental way, the Strategy needs to take this cross departmental direction (an approach already recognised by the NI Coastal Forum).

Increasing challenges posed by climate change will be felt, arguably nowhere more than at the coast (e.g. coastal erosion and coastal flooding). The current lack of policy and statutory responsibility for managing the NI coast means **it is crucial that the Strategy includes specific commitments to address both the policy framework and current lack of robust scientific data on coastal processes and shoreline behaviour.**

Working with nature and allowing naturally functioning shoreline ecosystems can provide huge benefits in adapting to the impacts of climate change and preparing for rapid rates of change at the coast, including the sequestration of carbon.

A specific goal for the coastal environment theme within the Strategy, supported by a strengthened Strategic Planning Policy Statement (SPPS) for new coastal change management legislation which aims for a naturally functioning coast and recognition of the long-term benefits of working with nature (nature-based solutions), rather than continuing to use engineering solutions that exacerbate the problems. The SPPS, produced in 2015, states that no development should take place in areas known to be at risk from coastal erosion. This has led to planning difficulties arising from a lack of data which would allow the reliable identification of such areas, and coastal change is therefore an issue currently exercising Local Authorities in the development of LDPs. This is different to the situation in the rest of the UK and ROI. **Under the UK Climate Change Adaptation Programme 2017 Evidence Report, it has been recognised by the UK Adaptation Sub-Committee that coastal erosion risk management in Northern Ireland is an area requiring ‘more action needed’ and ‘research’⁷.**

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<https://www.theccc.org.uk/wp-content/uploads/2016/07/UK-CCRA-2017-Northern-Ireland-National-Summary.pdf>

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?

NIMTF is broadly content with the suggest strategic themes. We raise specific points in relation to each of the themes in the questions that follow.

However, with the status quo failing to recover declining species populations and habitat conditions, **NIMTF would like to see an additional strategic theme - "Biodiversity Recovery" included 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?

Within the section on Environmental Engagement the interaction between DAERA, the public and environmental non-government organisations (NGOs) is omitted. NGOs provide an important link between the public and the environment and the public and government departments. NGOs have a key role in providing environmental expertise to government departments and are a strong platform for enhancing environmental engagement.

Successful environmental engagement requires an understanding of all stakeholders. It would be beneficial to **establish a framework for measuring the success of environmental engagement in Northern Ireland, such as an ‘engagement index’.** An example of an environmental engagement index is the *‘Monitor of Engagement with the Natural Environment - Natural England’*⁸.

It is important that engagement uses evidence-based messaging. An Environment Strategy for Northern Ireland should include examples of successes within each of the strategic themes, underpinned by evidence. **It is important that the future Environment Strategy has a reporting mechanism in place,** set to specific review periods, so that examples of successes and failings can be communicated and addressed in an open and transparent manner. **It is crucial that progress on the environment strategy is continually communicated,** in order to ensure sustained buy in from the public and stakeholders.

Stakeholders should have the opportunity to engage through formal and informal mechanisms. **Existing stakeholder groups such as the Coastal Forum should be considered as an effective tool for engaging on marine and coastal issues related to the Strategy.**

We are happy to see that the value and importance to society of outdoor recreation are acknowledged in the discussion document. We recognise the importance to both the economy and physical and mental welling being of the population of access to the marine and coastal environment for leisure and outdoor recreation. **It is important that the Strategy includes a section on outdoor recreation under the theme of Environmental Engagement and Coastal Environment as there are strong links between outdoor recreation (including coastal walking, beach users and several**

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/738892/Monitorof_Engagementwiththe_Natural_Environment_technical_report_March_2016to_February_2018.pdf

marine sports) and protected landscapes in NI. We would suggest ***“We have well managed landscapes, marine and coastal environments and high-quality urban spaces that are accessible and inclusive to everyone”***.

Q5: Do you have any comments on what specific issues should be included under a proposed Environmental Prosperity strategic theme?

NIMTF recognises that monetary value can be derived from the environment. However, the Strategy must recognise that **environmental prosperity is underpinned by a thriving environment**. The environment must be functioning at its optimum and not pushed to its limits. **We would welcome the expansion of a section on ecosystem services within the environmental prosperity strategic theme**. This theme should recognise the value of biodiversity rather than the value of the extracted resources. A report published by Hull University for NIMTF in 2014 showed that a well-managed network of marine protected areas for Northern Ireland's seas could be worth between £52.8 million and £54.5 million (net present value) in ecosystem services such as nutrient cycling, gas and climate regulation, food provision and leisure and recreation⁹. A recent analysis¹⁰ by the International Monetary Fund (IMF) found that a great whale is worth ~ \$2 million, due to their ability to capture carbon, ecotourism etc.

NIMTF would cautiously welcome the consideration of a natural capital approach¹¹ **within the Strategy**. The natural capital approach can help increase understanding of the complex ways in which natural, social and economic systems interact, impact, and depend upon one another¹². However, a concern with the natural capital approach is that in practice it may focus on ecosystem services and monetary values and not consider ecological aspects¹³.

The marine environment has an evidenced positive impact on health and wellbeing¹⁴. **The benefits that the environment provides for health and wellbeing should be recognised and included within this strategic theme.**

⁹ Barnard, S., Burdon, D., Strong, J. & Atkins, J. (2014) The ecological coherence and economic & social benefits of the Northern Ireland MPA network. Report to the Northern Ireland Marine Task Force (YBB238-F-2014). Institute of Estuarine and Coastal Studies (IECS), University of Hull, Hull, UK, HU6 7RX

¹⁰

<https://www.imf.org/external/pubs/ft/fandd/2019/12/natures-solution-to-climate-change-chami.htm#author>

¹¹ http://sciencesearch.defra.gov.uk/Document.aspx?Document=14440_FinalreportPhase1.pdf#page55

¹² <https://naturalcapitalcoalition.org/natural-capital-2/>

¹³ http://sciencesearch.defra.gov.uk/Document.aspx?Document=14440_FinalreportPhase1.pdf

¹⁴ <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1002/pan3.10038>

Resource Efficiency

The environment must be at the core of planning and development decisions. The DEFRA 25 Year Environment Plan embedded an ‘environmental net gain’ principle¹⁵ for development. The principle aims to ensure that development delivers environmental improvements locally and nationally. **We would like to see the DAERA Environment Strategy embed a biodiversity net gain principle.** Habitat loss is one of the biggest drivers of biodiversity loss, including a biodiversity net gain principle within the Strategy would ensure that any loss of habitat due to development is not only compensated but leads to greater habitat overall.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

Q6: Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?

In order for Northern Ireland to have '*a key leadership role in demonstrating to the rest of the world what is possible*' **significant action on climate change must be taken.** Northern Ireland is currently lagging far behind the rest of the UK and Ireland in relation to action on climate change. **It is untenable that Northern Ireland does not have a Climate Change Act. Broader adaptation actions are needed, and sectoral plans must be developed.**

Nature based solutions to climate change should be included within the Environmental Efficiency strategic theme. Furthermore, we wish to see healthy seas and associated habitats and species recognised as a nature-based solution to climate change. "Blue carbon coastal ecosystems" (e.g. seagrass meadows, saltmarsh, tidal wetlands etc.) have been proven to store more carbon, for longer and at a quicker rate than terrestrial based carbon habitats¹⁶¹⁷ (e.g. forests). Recovering and protecting these habitats effectively, would assist with climate change mitigation.

NIMTF also considers that **this strategic theme should include spatial efficiency** (for example Marine Spatial Planning), given the important impact that place based decision making can have on the environment.

¹⁶ <https://www.tandfonline.com/doi/abs/10.1080/00139157.2013.843981?journalCode=venv20>

¹⁷ <https://www.iucn.org/resources/issues-briefs/blue-carbon>

Q7: Do you have any comments on what specific issues should be included under a proposed Environmental Quality strategic theme?

The 2019 updated UK Marine Strategy Assessment Part One¹⁸, has painted a stark picture of the state of our seas, with **11 out of 15 indicators for healthy seas failing to be met**. Marine litter is increasing, seabirds are failing to breed, overfishing is continuing and the effects of climate change on our seas is being felt more than ever. Urgent action and ambition is needed to turn the tide for our seas. The Strategy must realise the action and ambition that is needed. The aim of DEFRA 25 Year Environment Plan was to be world leading, as it recognised that a safe climate and a biodiverse natural environment underpins economic, social and development aims, whilst also committing Government to reducing the UK's global footprint. The Plan sets out a long-term trajectory for meeting Government's promise that this would be the first generation to 'leave our environment in a better state than we found it'¹⁹. However, **the targets included for the marine environment, did not go above and beyond the status quo**. The 25 Year Environment Plan champions the new UK Fisheries Bill to deliver sustainable fishing post Brexit. Yet the current Fisheries Bill falls short of this ambition by not committing to ensuring that fishing does not exceed Maximum Sustainable Yield²⁰.

We welcome the recognition that the designation and management of protected sites are a key tool for halting biodiversity loss. However, currently in Northern Ireland only 4.48 % of marine protected areas are considered under "favourable management". **It is crucial that effective management plans for all protected sites are implemented urgently**. Furthermore, management plans must be framed within the context of recovery (where applicable) and climate change. A whole site approach must also be applied, whereby the wider ecosystem, processes and functions are protected, not just single features within the site. **The DEFRA 25 Year Environment Plan, commits to implementing a 'whole site' approach to MPA management**^{21,22}. The marine elements within the strategic theme on environmental quality should be framed in line with the primary objective of the Marine Strategy Framework Directive "**Protect and preserve the marine environment, prevent its deterioration or, where practicable, restore marine ecosystems in areas where they have been adversely affected**". An example of a specific SMART target we would like to see incorporated is: "By 2022,

¹⁸ <https://moat.cefas.co.uk/summary-of-progress-towards-good-environmental-status/>

¹⁹ <https://www.wcl.org.uk/docs/25%20YEP%20one%20year%20report%20design%20FINAL.pdf>

²⁰ <https://www.wcl.org.uk/docs/25%20YEP%20one%20year%20report%20design%20FINAL.pdf>

²¹ <https://www.gov.uk/government/publications/25-year-environment-plan>

²²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/765418/mcaa-mpa-report-2012-2018a.pdf

there has been a statistically significant increase in the number of marine mammals observed in Northern Ireland”.

Effective monitoring and enforcement of protected sites are key to their levels of success. **Resources must be allocated to improving the levels of monitoring and enforcement of protected sites.**

The implementation of an ecosystem based marine plan for Northern Ireland should also help to improve environmental quality and as such, **the marine plan must be included within the Environmental Quality strategic theme.** Targets and indicators for the effectiveness of the marine plan must be established. A mix of governance, socio-economic and environmental indicators should be employed²³. For example, governance indicators should measure the status of the plan, the level of stakeholder participation etc. Environmental indicators should describe the condition of the environment (e.g. as per the UK Marine Strategy indicators and targets). These **indicators and targets for the marine plan could be established within this Strategy**, thus improving the levels of policy coherency between the Strategy and Marine Plan.

While the integration of existing targets and indicators is important, the status quo has not improved the quality of our environment. Our colleagues from the Environment Link - Wildlife and Countryside Link consider that one downfall of the DEFRA 25 Year Environment Plan was the lack of ‘new’ targets²⁴ that go beyond the norm within the marine section of the plan. We reiterate again, that ambition is urgently needed within the Strategy in order for Northern Ireland to have a *“leadership role in demonstrating to the rest of the world what is possible”*.

The discussion paper states that the annual Environmental Statistics Report contains a wealth of data, however, we would argue the contrary, especially for the marine policy area. Both the annual Environmental Statistics Report and the UK Marine Strategy Assessment (Part One - 2019) have illustrated the lack of marine data for Northern Ireland and the Irish Sea, respectively. It is crucial that resources for data collection are increased, if the Strategy is to deliver tangible action.

²³ <https://unesdoc.unesco.org/ark:/48223/pf0000227779>

²⁴ https://www.wcl.org.uk/docs/25YEP_Link_EAC_evidence_FINAL.pdf

Q8: What do you see as the main environmental governance priorities for Northern Ireland?

NIMTF considers environmental governance as a key theme which must be addressed within the environment strategy.

We consider the following to be the main environmental governance priorities for Northern Ireland:

- **The Environment Strategy and associated targets and indicators must be legislatively underpinned.** Urgent action is needed to reverse the continued evidenced decline of our environment. We assert that **this cannot be achieved without a legally binding strategy, complemented by SMART targets and indicators.**
- An environment strategy must have a **mandatory review and reporting period**, so that unintended negative consequences can be rectified and to allow the strategy to be adapted over time. Given the uncertainties presented by Brexit, a review structure for the Environment Strategy would allow for these uncertainties to be addressed as and when appropriate.
- **Existing national and international targets and indicators should be integrated** within the strategy (e.g. UN SDG 14, UK Marine Strategy etc.).
- **The remit of the Office for Environmental Protection (OEP) should be extended to Northern Ireland** (given the lack of alternative options that currently exist).
- **An independent Environmental Protection Agency (EPA) must be established in Northern Ireland.**
- **An ecosystem based approach to fisheries management must be applied** in Northern Ireland. Northern Ireland's fisheries policy should (at a minimum) be on par with UK legislation.
- **The Strategy must have full cross-departmental engagement and compliance.** The establishment of a cross departmental ESNI working group would assist in ensuring effective communication and reporting of the strategy across all government departments.
- **A mix of bottom up and top down governance structures on specific environmental issues** may also help secure public buy-in to the future environment strategy.

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?

The proposed outcomes are broadly appropriate; however, they are lacking the level of ambition that is required. As an example, some of the draft outcomes from the Scottish Environment Strategy better realise the levels of ambition that is needed:

- We are a climate leader and play our full role in limiting global temperature rise to well below 2°C.
- Our biodiversity is protected and enhanced, supporting healthy ecosystems.

Outcome 4: ***Biodiversity loss is halted, ecosystems in a healthy state, and well managed landscapes***

This outcome is lacking the ambition and system change that is needed. We recommend that the outcome is changed to the following: ***Biodiversity loss is halted, species populations are restored and previously damaged habitats are recovered. The ecosystem is functioning at its optimum. Northern Ireland's land and seas are well managed.***

Outcome 5: ***We achieve sustainable consumption and production on land and sea.***

Given the approach of resource and ecosystem collapse, continued economic growth at the expense of the environment and finite resources is no longer possible. Outcome 5 should provide more of a context for what is meant by 'sustainable consumption and production'. We recommend that the outcome is split into two, with one specifically addressing ecosystem based fisheries management: ***Our fisheries management system considers the wider environment. Fish stocks and the environment are managed together sustainably.***

Other Comments:

Furthermore, **these outcomes must be made SMART, supported by legally targets and indicators, and a mechanism for reviewing and reporting on them should be established.**

Q10: What are your big ideas for the future protection and enhancement of the environment?

Marine Protected Areas (MPAs) are an essential management tool for conserving marine resources and protecting marine wildlife. A well-managed network of MPAs will help to restore and build resilience into our marine environment, playing an important role in the recovery and sustainable management of our seas. **However, our network of MPAs must be adaptive to the effects of climate change. NIMTF would like to see the implementation of climate adaptive MPAs in Northern Ireland.**

Spatial efficiency should be an important factor in managing and restoring Northern Ireland's marine environment. An ecosystem based marine plan for Northern Ireland must be implemented. Furthermore, NIMTF would like to see the **development of marine *spatial* plans for high use areas** in order to better manage the competing interests in our marine space.

We would like to see **active restoration** of marine habitats to move them to 'favourable condition'. For marine species, rather than avoiding 'statistically significant declines' in populations we would like to see 'statistically significant increases' in populations.

Our marine environment is intrinsically linked to our cultural heritage yet the connection between people and the sea is somewhat lost. The Strategy should aim to **engage coastal communities more effectively and develop and strengthen the link between people and the sea.** This is a crucial action for both; connection to our cultural heritage and improving our health and wellbeing.

Fisheries have the potential to contribute to the draft outcomes of the Strategy. To contribute to the outcomes, the environment strategy should enable the implementation of an **ecosystem based approach to fisheries management.**

Lack of action on climate change will significantly undermine the purpose and outcomes of the Strategy. Northern Ireland must **implement bespoke climate change legislation** as a matter of urgency. Emission targets must be introduced to ensure that Northern Ireland plays its role in limiting global temperature rise to below 1.5 °C. Without fit for purpose climate policy and legislation our environment will not be resilient or adaptive.

Adequate monitoring and enforcement must be included within the above. Without adequate monitoring and enforcement, the full potential of these actions will not be felt, and we fear that the deterioration of our marine environment will continue.

Q11: Do you have any other comments or contributions?

Legally underpinned strategy

The UK Marine Strategy is an important framework for protecting our seas, however, authorities are only required to 'have regard' to it when exercising their functions. This has resulted in a weakening of what should be a strong and comprehensive framework for managing our seas. An Environment Strategy for Northern Ireland should recognise the pitfalls of other strategies and aim to go further. A future Environment Strategy for Northern Ireland must be enshrined in legislation. We fear that without a statutory footing, the policies within the Strategy will not be strong enough to bring about the real change that is needed.

The Sustainable Development Goals

Legally binding SMART targets within the Strategy should be coherent with the UN Sustainable Development Goals (at a minimum). A cross departmental working group should be established to further progress on achieving the SDGs. For efficiency, this group could also be tasked with progressing the Environment Strategy. In turn, the Environment Strategy could be used as a reporting mechanism for Northern Ireland's progress on the implementation of the SDGs.

Cross border cooperation

The environment does not adhere to jurisdictional boundaries. Cross border cooperation should be accounted for within the strategy. As an example of the need for cross border cooperation - the disputed waters of Lough Foyle has delayed the designation of sites here such as native oyster Marine Conservation Zone (MCZ), which remains a gap in achieving an ecologically coherent network of MPAs in Northern Ireland²⁵.

Resources

It is not clear at this stage what level of resources will be allocated or indeed are needed to implement a future Environment Strategy for Northern Ireland. However, it is clear that the levels of resources currently directed towards long term strategies (such as the UK Marine Strategy) are not adequate. In order for the Strategy to realise the system wide change that is needed, adequate resources must be allocated to its implementation, monitoring and review. While a lack of resources is a barrier that must

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<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/JNCC%20DAERA%20NIMPA%20Network%20Progress%20v6.0.pdf>

be overcome, it must also not be used as a justification for a lack of ambition within the Strategy.