



The Northern Ireland Marine Task Force (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB NI, 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.

Northern Ireland Marine Task Force response to:

[Consultation on the draft Green Growth Strategy for Northern Ireland](#)

Submitted on 20/12/2021

General comments

Ecosystem services delivered by healthy, productive and resilient seas are vital for positive social, economic and well-being outcomes in society. Given the significant impact climate change will have on the marine environment's ability to deliver these services, the Northern Ireland Marine Task Force (NIMTF) welcome the draft Green Growth Strategy. It is well overdue that Northern Ireland (NI) set out its principles and strategic vision for simultaneously decarbonising our society, protecting and restoring our environment and sustainably growing the economy through the creation of green jobs.

NIMTF appreciate and agree with remarks on the importance of delivering a resilient environment, and how *'Our natural environment is one of our most important assets and contributes to our prosperity and well-being in numerous ways'*. The strategy states that it *'also focuses on the role of nature-based solutions, well recognised as a key means of delivering climate mitigation and adaptation outcomes'*, but it is unclear where within the document this added focus is detailed or elaborated upon. It is essential that the strategy maximises the opportunity to deliver benefits for nature, climate and well-being, and water quality. Regarding the strategy outlined to decarbonise NI, protecting and enhancing blue carbon habitats that sequester and lock away carbon should be considered and valued equally as for example, that of phasing out fossil fuels.

While NIMTF appreciate this is a high-level strategy document, providing a framework upon which other policies and strategies can support and be supported, the biodiversity strategy, which has critically important linkages to this Green Growth Strategy, is conspicuously missing from the list of examples given: *'(Environment Strategy, 10x Economy, Investment Strategy, Energy Strategy, Skills Strategy and Future Agriculture and Food policy frameworks)'*. Crucially, the detail on how the principles outlined in the strategy will be realised, and how the NI Executive will be held accountable to their commitments (with or without the inclusion of a Green Test), are also missing.

The Task Force welcome the commitment to publish Climate Action Plans, but the Green Growth Strategy must also recognise the broader benefit of, and commit to, delivering ambitious nature protection and restoration programmes in NI. These benefits go beyond greater levels of biodiversity,



climate change mitigation and adaptation, but also include increased levels of employment and economic opportunities for coastal and rural communities in the green environment and conservation sector.

Barriers to Green Growth in the marine environment

NIMTF are working towards healthy, productive and resilient seas for Northern Ireland, and for the overarching aims of the Green Growth Strategy to be achieved, a number of policy and planning issues regarding the marine environment urgently need to be addressed:

i) Absence of a Northern Ireland Marine Plan: There is currently no marine plan in place for Northern Ireland. Without an effective and spatially prescriptive marine plan that prioritises nature positive and sustainable development at sea, the goal of Green Growth in a marine context is untenable. The marine plan needs to take an ecosystem-based approach, be integrated with other policy frameworks (UK Marine Strategy and the establishment of an ecologically coherent Marine Protected Area (MPA) network) and allow room for nature preservation and restoration. It also needs to consider the consequences of planning decisions, especially those around marine/offshore renewables, such as fishing displacement and cumulative impacts.

ii) Incomplete MPA network: Northern Ireland’s MPA network is incomplete. Without an ecologically coherent network of MPAs which are well managed, monitored, enforced and resourced, the goal of Green Growth in a marine context is also untenable. A well-managed network of MPAs will help restore and build resilience into our marine environment, playing an important role in the recovery and sustainable management of our seas. This will have cumulative, long-term benefits as the assets and ecosystem services provided by our seas grow. We also know that many marine and coastal habitats such as saltmarsh, seagrass and sediments sequester and store ‘blue’ carbon from the atmosphere and oceans, hence protecting and enhancing them is an essential part of mitigating and adapting to the impacts of climate change. Healthy saltmarsh and seagrass beds can provide protection from coastal erosion, delivering significant economic benefits also.

iii) Failure to meet UK Marine Strategy targets: Clean, healthy, safe, productive and biologically diverse seas are a prerequisite for their sustainable use. Likewise, our marine environment must at least achieve Good Environmental Status before Green Growth is attainable in a marine context.

iv) Fisheries management: The fishing industry is an important aspect of Northern Ireland’s culture and economy. To ensure the fishing industry’s success, the protection of fish stocks and to facilitate the delivery of Green Growth, the NI fishing industry must truly be sustainable in terms of how, how much and where it operates.

v) Failure to meet water quality targets: In 2021, no river, lake, transitional or coastal water bodies in NI achieved good overall status under the UK Water Framework Directive. Likewise, in 2020, 66% of Shellfish Water Protected Areas failed to meet guideline standards. Northern Ireland’s long-term failure to meet water quality targets remains a significant barrier to public health, food production (e.g., commercial fishing and aquaculture) as well as preventing wider ecosystem recovery.



Green Growth and sustainability

The most important aspects of the Green Growth Strategy in determining its success, are its sustainability merits. The ‘growth’ of the Green Growth Strategy is to be encouraged, but not at the expense of nature and wildlife. Neither should legitimate aims to decarbonise NI come at the expense of habitats and wildlife. Therefore, this Green Growth Strategy must acknowledge and accept that continuous economic growth is not possible in a society and world where natural resources are finite.

Investment in nature and restoration will bring its own range of economic, societal and health benefits, which are themselves important aspects of a thriving, sustainable and green Northern Ireland.

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