

Response to draft Environment Strategy for Northern Ireland

17 January 2022

Introduction

Greener UK is a coalition of 12 major environmental organisations that came together to ensure that environmental standards and protections are maintained and enhanced during the Brexit process.

We welcome the opportunity to respond to the draft Environment Strategy for Northern Ireland and set out below our main priorities for how the Strategy should be amended and implemented. There are many compelling reasons why the implementation of a robust, ambitious Environment Strategy is urgent. For example, just one of 49 priority habitats and no lakes, rivers or coastal waters in Northern Ireland are in [good condition](#).

While the six strategic environmental outcomes depict an encouraging direction for Northern Ireland's natural environment, neither the visions nor the actions and targets are ambitious enough to generate a significant improvement to the environment. In particular, the governance structure supporting the Strategy is inadequate for the essential task of implementing, monitoring, enforcing and revising the actions and targets to the extent that they take precedence over (or even equal) other public policy priorities.

Given the Executive's [failure](#) to meet environmental improvement targets, we have set out below the key principles that we believe must underpin the Environment Strategy and give oversight bodies – the Office for Environmental Protection (OEP) and an independent environmental protection agency (iEPA) – sufficient powers to hold the Executive, local authorities and others to account.

Key principles

To ensure that the Strategy is effectively delivered, a strong enforcement framework and governance structure will be key. We recommend:

- That **DAERA brings forward the Commencement Order for the Environment Act 2021 to the Northern Ireland Assembly as soon as possible** so that the Act can be fully implemented in Northern Ireland and the Environment Strategy can be adopted as Northern Ireland's first environmental improvement plan (EIP). The governance structure provided by the implementation of the Act, particularly the oversight of the Office for Environmental Protection (OEP), will establish a solid foundation on which to build more rigorous monitoring and enforcement of the actions and targets in the Strategy.
- That **DAERA dedicates adequate resources, including staffing, funding and coordinated planning**, to meet the objective of an EIP to "significantly [improve] the natural environment." The Strategy alone is not sufficient, nor ambitious enough, to protect and improve the environment. DAERA must dedicate resources to implementing and monitoring the Strategy on a long term basis. Additionally, the Strategy must identify departmental responsibilities and actions within the Executive and public authorities under each Strategic Environmental Outcome. This should be listed in an accessible table that also details SMART-ness, owner of target/action, and resourcing commitments/streams to aid monitoring and transparency.

- That **the Environment Strategy includes SMART actions and is supported by legally binding interim and long term targets**. Without SMART targets, enforcement bodies and public authorities will lack a clear framework to deliver, monitor and oversee the Strategy. The Executive should also commit to legislating for nature’s recovery, with a robust duty on the Executive to act to meet targets in key areas of improving the natural environment, including on biodiversity, water (freshwater and marine), air quality and resource use. An improved and ambitious Environment Strategy would guide policy making across the Executive.
- A **coordinated effort across Executive departments to deliver the Strategy**. We warmly welcome the acknowledgement in the Strategy that “our environment affects every aspect of our existence. It is central to all life, what we do, what we eat, how we work, where we live and play, it is unquestionably our most precious asset”. The commitment to improve Northern Ireland’s natural environment must be set out and upheld by all departments to secure cohesive and strategic deployment of the necessary resources, with policy making coordinated to prioritise environmental protection. Demonstrable commitment from all departments towards the shared goal of an improved natural environment would set a clear example for the people and businesses of Northern Ireland and would show clear intent to “deliver real improvements in the quality of the environment.”
- **Establishing an independent environmental protection agency (iEPA) as soon as possible**. We welcome the confirmation that “the OEP will be independent of both the NI Executive and UK Government” as well as the commitment to establish an iEPA in the New Decade, New Approach agreement. The latter must be a priority alongside the implementation of the OEP. The two oversight bodies have distinct but complementary roles to play in overseeing the delivery of targets and actions within the Strategy.

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