



NILGA response to the discussion document on an Environment Strategy for Northern Ireland

5th February 2020

The following response has been drafted in liaison with relevant local government officers, and with the invaluable assistance of Sustainable NI, Climate NI and the Red Cross. It has also been informed by communications from Northern Ireland Environment Link and by a policy event held by the Northern Ireland Council on Voluntary Action (NICVA). Any queries can be directed to Karen Smyth at the NILGA offices k.smyth@nilga.org.

Derek McCallan
Chief Executive

5th February 2020

1.0 Introduction

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of the 11 Northern Ireland district councils and is supported by all main political parties. The Association welcomes the opportunity to participate in the discussion around a new environment Strategy for Northern Ireland and we trust that the views outlined below will be taken into account as policy is developed and finalised.

2.0 Initial Comments

NILGA strongly welcomes this discussion document, as a precursor to the production of an Environment Strategy for Northern Ireland. Such a Strategy is urgently needed, alongside relevant, properly resourced monitoring, regulation and enforcement.

It is noted that there is no explicit reference in the discussion document about a potential timeframe for a Strategy, although the inference is that it will be long term. NILGA would advocate that any forthcoming strategy should cover at least a 25 year period – preferably to take us up to 2050. A timeframe of this nature will enable robust targets to be set and for a number of the aims expressed in the discussion documents to be strengthened.

We are at a crucial point in time for our environment and it is important that we get this Strategy right, that we involve everyone who needs to be involved; that it is given the priority required by all government departments and other partners and that it is adequately resourced.

Until recently NILGA had no strong position in relation to an Independent Environment Agency, but we have been clear for quite some time that urgent improvement to the current system is required. To have the environmental regulator as part of the same department as the promotion of an industry (i.e. agri-food) that is one of our major carbon emitters, is especially problematic.

At its meeting of 16th December 2019, the NILGA Executive agreed that NILGA policy should be strengthened on this issue, and that **the Association now supports an Independent Environment Agency**. The detail of the arrangements for this will require further consultation and consideration, particularly in the context of recent UK government discussions surrounding an Office of Environmental Protection.

In recent years, environmental issues have grown in importance in the public consciousness, and in government consideration, and it is now vital to make the changes across government to facilitate the improvements necessary, to enable Northern Ireland to decarbonise and to drive the necessary changes to behaviour and culture to ensure Northern Ireland is resilient to coming challenges, with communities empowered, particularly to engage in climate adaptation activity. This will require sustained central and local government and societal collaborative proactivity over a considerable period of time. NILGA and our member councils are ready, willing and able to work with government, business and the public to begin to meet these challenges, and we look forward to the publication of the Strategy to better inform and focus effort, some of which has already begun.

3.0 Specific Comments

NILGA has made specific comments within the response template (attached overleaf).

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Environment Strategy for Northern Ireland

Public Discussion Document

Stakeholder Response Template



September 2019

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**INVESTORS
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ABOUT YOU

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Please note that the text boxes used throughout this template will expand to accommodate your response – there is no character limit.

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

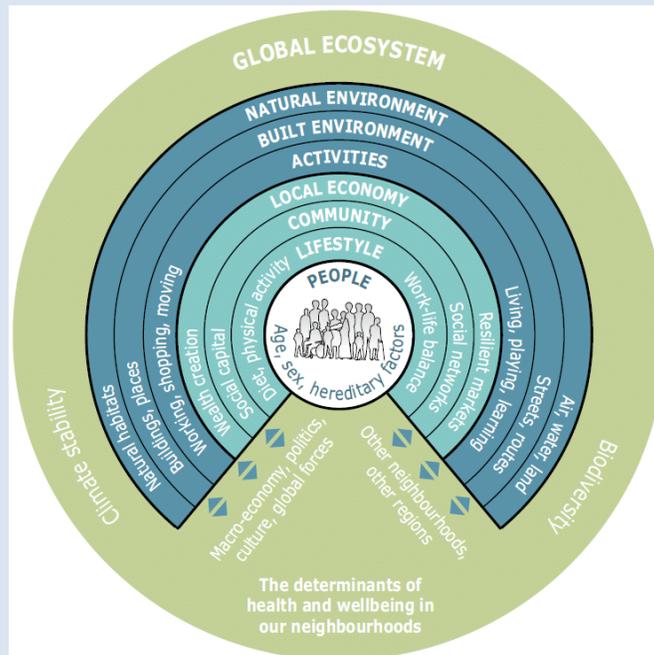
Yes

No

Comments

NILGA believes that the importance of the Environment Strategy should be at the very least, on par with other Executive endorsed Strategies, however it is noted that a number of these Strategies are now ‘out of date’ and will require contemporisation.

The importance of the environment is best summarized in the diagram below entitled *The Determinants of health and well-being* and is, we believe, the context upon which the entire proposed Environment Strategy should be based.



Source: Barton and Grant, University of the West of England, 2006 (Origins in the *Bruntland Report* and in the work being undertaken by the World Health Organisation).

Our environment, which is essential to future prosperity and well-being, has never been under more pressure: biodiversity is in decline, air and water quality remains poor and there is a global climate emergency which is impacting upon all areas of life.

Effective delivery of an ambitious long-term Environment Strategy will help reverse the decline and then, critically, should set Northern Ireland on a new path of renewal and environmental regeneration.

Before commenting further on the content of this Discussion Document, NILGA believes that any future Environment Strategy for Northern Ireland must be based on the following principles. The Strategy **must**:

- Have statutory footing and binding targets that are clear, measurable, ambitious and in line with the UN Sustainable Development Goals. The link to the SDGs must be more than a 'nice to have'. 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.
- 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 appropriately monitored with clear mechanisms to hold government to account.
- 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.

In addition, we believe it is fundamental to the future of Northern Ireland that:

- An Environment Bill for Northern Ireland is enacted to give the Environment Strategy a binding, legal footing. Failure to do so will mean the document will lack 'teeth' and remain largely ineffective along with a host of other strategies such as the NI Sustainable Development Strategy and the NI Biodiversity Strategy. It could be argued for example, that if our Sustainable Development Strategy had been backed up by more effective legislation, our environment would not be in as bad condition. Without robust legislation the state of our environment will continue to diminish.

It is noted that Northern Ireland remains the only part of these islands without an independent Environmental Protection Agency. We need to ensure independent and robust monitoring and appropriate mechanisms to hold government and polluters to account, and NILGA is clear that urgent improvement to the current system is required.

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?

Review of Planning legislation and policy and in particular 'Permitted Development Rights' and retrospective planning permission. Government needs to tackle the issue of unintentional or deliberate misuse of permitted development rights in the countryside. Clarification needs to be provided as to when the use of PDR is allowed and when a planning application is required. If the issue of PDR continues to be interpreted incorrectly, consideration should be given to changing what is currently allowed. Government also needs to tackle the issue of development without planning permission and the extremely high success level of retrospective permission.

Under Built Environment there is reference to 'heritage buildings and monuments'. Given the nature of the NI landscape and the historical intertwining of natural and historic environment, there should be more attention on the historic environment including archaeology. For this Strategy to succeed it requires a partnership approach across Government, and is particularly relevant to the Historic Environment Division.

Urgent consideration also needs to be given by the Department of Finance, to the contemporisation of building regulations to ensure NI decarbonises appropriately and puts in place appropriate future proofing measures to assist in adapting to climate change – e.g. hard and soft sustainable drainage systems.

The 'Neighbourhood Environmental Quality' area should also consider good quality planning and place-shaping and for example include policy on street furniture for recycling.

Other Comments

While we agree with the broad environmental areas listed, we would like to make the following additional comments:

- We agree with the assertion that environmental issues do not respect borders and believe that the island of Ireland and its surrounding seas represent a single biogeographic unit with shared land and sea borders. Therefore to effectively address these issues we should do so on an all-island basis which will require on-going and close cross-border cooperation at a departmental, local authority and community level.

- We note that the sentence on P15 stating *'Linking the Environment Strategy to appropriate international standards, such as the UN Sustainable Development Goals, may also be desirable'*. For NILGA, the linking of the Strategy to the SDGs should be mandatory not optional. The UK government has signed up to delivering the SDGs and Northern Ireland is required to contribute to the UK reporting process. As we believe all future NI Departmental Strategies and Policies (including Programmes for Government) must help deliver on our commitment to implement the SDGs, an SDG Implementation plan for NI with specific indicators must be developed. By using the SDG model, it should be easier to progress/implement the Environment Strategy in the absence of a NI Executive, as it does not require a new approach/departure from previously agreed Government policy. Also, if framed around the SDGs, the Environment Strategy and associated implementation plan could be used as an SDG reporting mechanism.
- While agreeing with the statement that *'For a high-level environment strategy to be meaningful it is essential that it is ambitious in terms of its breadth and depth'* We would argue however that for the Strategy to be meaningful it must have:
 - **Legally-binding environmental objectives** for wildlife, water, air and natural assets, each with a delivery strategy, timeline and milestones;
 - **Green investment** ensuring public and private money supports greener towns, countryside and seas;
 - **Accountability across government and the private sector** applying the polluters pays principle and ensuring government and businesses are held to account for their environmental record.
- Similarly, we agree that the Strategy must contain ambitious goals/targets. To ensure this is the case and in order to make a real difference each objective must:
 - Have SMART goals and targets to ensure they are measurable and time bound with clear milestones;
 - Be new and avoid being merely repeats of existing commitments already made in other policy or agreements that we are currently failing on;
 - Be 'world leading' if we are to meet the ambition set out on P21 that, *Northern Ireland will also have a key leadership role in demonstrating to the rest of the world what is possible*. We cannot rest on the laurels of our successes in renewable energy provision and diversion from landfill.
- If the Strategy is to 'make a difference to the lives and wellbeing of this and future generations' it will need to remain a 'living' document in that it must be able to respond to new and emerging environmental challenges.

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?

Other Comments

Q4: Do you have any comments on what specific issues should be included under a proposed Environmental Engagement strategic theme?

Changing the attitude of society to the environment is crucial to the long-term prosperity of Northern Ireland. Research has shown that outdoor and environmental education has multiple benefits for children. Schools can be seen as drivers of sustainability at the heart of their communities, promoting a culture of 'learning together'. Engaging adults in informal lifelong learning using the outdoors also brings a range of benefits. Environmental education has been shown to:

- Improve academic performance across the curriculum including numeracy, literacy and STEM activities
- Encourage children to transfer and apply skills learned in the classroom, and lets them gain skills to tackle future environmental issues facing Northern Ireland
- Increase equality of opportunity for children from all backgrounds
- Bring inherent health and wellbeing benefits to children and adults

It is crucial therefore that a joint Department of Agriculture, Environment and Rural Affairs, and Department of Education 'Environmental Education Strategy' is developed for Northern Ireland, which promotes an expectation of outdoor learning and fieldwork both within the curriculum and through lifelong learning.

We believe the issues, target groups and proposals listed under this theme can be categorised as achieving Behavioural Change in relation to our interaction with the environment. Behaviour change at all levels, in government, in business and in individual decisions and actions, is critical to the success of all the significant changes required to protect and, where needed, restore our environment for current and future generations.

As such this theme could include measures such as:

- Establishing a behaviour change knowledge resource in NI to:
 - Summarise/ disseminate research appropriate for use by government/ eNGOs
 - Support effective and consistent organisational communications with the public
 - Drive public behaviour change in line with necessary changes to business models.
- Carry out local research to ensure suitability of findings elsewhere for NI culture and norms.
- Engage the public, including young people, when deciding on the priorities for which behaviours need to change.
- Increase opportunities for councils to promote environmental behavioural change beyond traditional areas such as waste and recycling
- Encourage and support experimentation to test innovative behaviour change approaches.
- Grow opportunities for young people to take action on the environment and nurture and encourage the next generation of environmentally responsible citizens
- Engage in in-house behaviour change campaigns and support expansion across government departments where success is proven. Expect the same approach from recipients of departmental funding.
- Support a community resilience approach and initiatives. For people and communities in the highest risk areas, as a result of climate change (e.g. increased flooding, severe weather incidents, coastal/sea level changes and heatwave impacts), to be supported to increase their preparedness and recover from the increasing humanitarian risks and impacts.
- Introduce an environmental 'engagement index' to act as a baseline measure to determine future progress.
- Consideration should be given to communication techniques, and particularly the usability of the DAERA website and/or exploration of alternative online channels
- Behavioural change for 'business' is crucial; DAERA should review current mechanisms for engaging with business, including Prosperity Agreements
- DAERA should adhere to best practice with regards to Open Government principles, including Open Data, when engaging with the public

Finally, it is worth noting that the key behavioural change that has helped fund many

existing environmental initiatives has been the introduction of Plastic Bag Levy legislation. More, focussed investment will be required to ensure that our efforts are prioritised effectively in reaching key demographics and sectors.

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

NILGA agrees with the statement (P19) that *'There is a tremendously close, some would say symbiotic, relationship between the environment and the agri-food sector, each with the potential to significantly impact the other'*. We must ensure therefore that environmental and agricultural policies are not developed in isolation from each other and with often competing visions. Failure to integrate policies can result in major long-term negative implications for the environment, which has been the case following implementation of the Going for Growth Strategy which saw a drive to expand the agri-sector in Northern Ireland in order to grow sales by 60% without due regard to the environmental implications.

We therefore endorse the recommendations of the 2019 Food, Farming & Countryside Commission Report *Lay of the Land* (Northern Ireland Inquiry) which outlines the need for a 'transformation in our food and farming system in order to respond to the climate emergency and restore biodiversity, improve the public's health and wellbeing in all communities and develop Northern Ireland's distinctive pattern of farming to play its full part in responding to these challenges, supporting and revitalising rural communities'. Development of the agri-food sector must be sustainable.

Development of a Land Use Strategy for Northern Ireland which enables landowners, individuals and communities to make the best use of our land and landscapes in a way that is beneficial to nature and the climate, must therefore be a key outcome of the Strategy. Unlike the rest of the UK, the land use, land-use change and forestry sector is a net carbon source rather than a net sink. Forest coverage is around 40% lower in Northern Ireland than in the UK as a whole. A Land Use Strategy could rectify this, and facilitate a more strategic approach to land management which could help alleviate land use conflicts and ensure that land continues to provide goods and services to society while minimising adverse impacts on the natural resource (land) base.

We believe, the environment and the economy can deliver prosperity for society, hand-in-hand. Northern Ireland's available natural and cultural resources represent what we have 'in the bank', in terms of nature and what the environment delivers for society. We need to protect that long-term investment, ensuring that society 'lives off the interest' rather than eating in to, and depleting, our irreplaceable 'Natural Capital'. The Environment Strategy must ensure the development of policies that explicitly recognises the relationship of environment and prosperity, by producing a Natural Capital Index for Northern Ireland.

Other comments

- The document notes the importance of the environment and heritage for tourism. As well as the huge potential for eco-tourism using our unique natural heritage, NI needs an overarching Sustainable Tourism Strategy which respects and protects our valuable natural heritage and is based on a 'high value' tourism model rather

than 'high volume' which is the status quo at present;

- A 'Green New Deal' must be included in the Strategy; Government should revisit the detailed proposals for a Green New Deal which eNGOs have previously submitted; as with other actions, cross-Government partnership will be essential;
- There are obvious opportunities for economic regeneration in the built environment; there are many historic buildings lying vacant or languishing in the 'Heritage at Risk NI' list which should be prioritised for restoration; these could be repurposed for community and economic benefit.

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

Climate Change NILGA believes that if we are to have '*a key leadership role in demonstrating to the rest of the world what is possible*', we must first address the main issues in relation to climate action in which we lag well behind:

- A Climate Emergency must be declared across all of Northern Ireland; a number of councils have already taken a lead on this and most councils are actively working to address adaptation and mitigation challenges.
- Given the urgency of the situation and with countries around the world committing to taking action, it is unacceptable there is no specific climate change legislation in Northern Ireland. Legislation for climate change in NI would allow specific policies to be developed to meet emissions targets and enable society adapt our environment to the risks. NI Climate Change Legislation should include:
 - Reduction targets in line with UK legislation and other UK jurisdictions including a target date to achieve net zero carbon emissions;
 - Interim targets and carbon budgets (over five-year periods);
 - Creation of a NI Committee on Climate Change (similar to UK Committee);
 - A National Climate Change Mitigation Plan inclusive of all sectors and tiers of government, with appropriate targets, actions and reporting;
 - Resourcing of local authorities to develop climate change mitigation and adaptation plans and actions;
 - Amendments to planning policy to allow local authorities to set much higher local energy efficiency standards for permitted developments
- Climate Change Adaptation urgently needs to expand, with more attention on reaching the sectors which will be most affected; in particular
 - more focus on local government and its role in driving forward climate action at local level, including expansion of DfI RCRG activity;
 - A stronger focus on and investment in community resilience, recognising the unique role of local government to support people and communities in

the highest risk areas, as a result of climate change (e.g. increased flooding, severe weather incidents, coastal/sea level changes and heatwave impacts) to increase their preparedness and recover from the increasing humanitarian risks and impacts.

- more focus on and investment in green and blue infrastructure solutions to climate change within the public realm
- development of a reporting mechanism to assess and monitor progress
- A new approach to empowering communities to ensure resilience, with councils recognised as local leaders on this activity
- Better resourcing of a cross-cutting government or independent unit to lead on climate action – mitigation and adaptation.

Resource Efficiency & Circular Economy The Northern Ireland economy needs to move away from the largely linear system on which it is currently based and its reliance upon our finite resources. We believe the Strategy needs to:

- Tackle the consumption issue (which is ethical as well as environmental) and works towards a circular economy for Northern Ireland;
- Ensure a holistic approach to the circular economy, including smart regulation, market-based instruments, research and innovation, incentives, measures of performance, and information exchange;
- Build Northern Ireland's clean green image as an attractor for inward investment, recognising the economic and tourism potential inherent in our natural and cultural heritage – which demonstrates that Northern Ireland remains committed to delivering our targets for emissions, waste, recycling, and energy efficiency.

Improving the efficiency of resource use and ensuring that waste is valued as a resource rather than an end-product, can contribute to reduce dependency on importing raw materials and help the transition to more sustainable material management and to a circular economy model.

Sound and efficient waste management systems are an essential building block of a circular economy. In Northern Ireland there is growing understanding and ambition to work towards creating a prosperous circular economy, creating opportunity for sustainable consumption and production, including increased economic activity and job creation.

This Environment Strategy must enable citizens and economic activity to prosper through clear and action-led commitment. This includes following up on cross-departmental recommendations made for increasing circular economy activity within and by government both directly and through policy development.

Furthermore, the Strategy must ensure NI's circular economy policies align with objectives of the EU Circular Economy Package and so will help to provide:

- Waste prevention and resource efficiency overall
- Effective management of plastics
- Creation of economic opportunities along the supply chain
- Adequate provision to monitor and evaluate impact and benefits
- Improved citizen awareness and commitment through behavioural change interventions and effective communication
- Reduction of marine littering

Develop and implement policies that work across all government departments to promote the development of a circular economy and realise the economic benefits and opportunities this can provide. Critically important roles will be played by Department for Economy, InvestNI, Department for Infrastructure and Department for Finance (including in its relationship with HM Treasury) as well as DAERA and local councils. The Universities and Colleges will also have a vital role to play in research and development, and materials science.

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

We would broadly agree with the issues proposed under the Environmental Quality strategic theme. However, this section of the paper sets out a number of issues with no identified solutions. It will be crucial to be proactive in how we improve environmental quality, and as previously stated, the Strategy must contain ambitious goals/ targets for these issues. To ensure this is the case and in order to make a real difference each issue (Air, Water Quality, Biodiversity etc.) must be:

- Accompanied by SMART goals and targets to ensure they were measurable and time bound with clear milestones.
- ‘New’ and avoid being merely repeats of existing commitments/targets already made in other policy or agreements that we are currently failing on. We have for example failed to meet our target of halting biodiversity by the previously agreed date of 2010, 2015 and we are well on our way to failing to meet our 2020 target. Therefore, merely identifying a further date without ambitious and enforceable compulsory targets is likely to achieve the same poor results.
- ‘World leading’ if we are to meet the ambition set out on P21 that, *Northern Ireland will also have a key leadership role in demonstrating to the rest of the world what is possible.*

Some additional specific comments on this section

- While P25/26 rightly states that *‘designation and management of our protected sites is a key tool in our efforts to halt biodiversity loss on land and sea’* it needs to be acknowledged that to date resources/ effort have primarily been directed towards designation rather than management, as evidenced by the poor condition of our designated sites.

- Promoting and facilitating the transfer of unused public land for community and environmental benefit
- Forest coverage is around 40% lower in Northern Ireland than the UK as a whole. In addition to a Land Use Strategy which needs to extend beyond agricultural land, a Tree and Hedgerow Strategy should be developed to increase tree cover and hedgerows in a strategic manner. This should be in such a way to alleviate flood risk, improve environmental quality and benefit wildlife by providing ecological corridors.
- Although the document rightly identifies agricultural run-off as the main cause of poor water quality, the issue of mis-connections and cumulative impact of pollution from defective septic tanks also need addressed within the strategy. Active collaborative working will be needed with NI Water and Department for Infrastructure on this issue.
- While referencing the issue of dilapidated and unsightly buildings and structures, the strategy should also ensure we do more to protect and maximise the return from our architectural heritage.
- Given the level of the litter problem in our urban areas and wider countryside, it is inexplicable that 'we do not yet have a litter strategy'.
- An additional area worthy of inclusion in the Environment Strategy is light pollution. It is a growing problem, given the diminishing number of 'dark skies'. As well as the impact on nocturnal animals, there is are other issues relating to the energy costs of lighting the countryside - roads, floodlit houses etc.

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

We note the statement on P30 that *'While there is support for an independent agency, responses to the most recent discussion document on environmental governance indicated a widely held view amongst stakeholders that the focus should be on environmental outcomes rather than simply changing delivery structures'*. It is however noted that multiple independent reviews of Environmental Governance in NI over the last twenty years concluded that an independent EPA should be introduced here as a matter of urgency. The most recent Report: [Northern Ireland: Challenges and opportunities for post-Brexit environmental governance](#), concluded that the region is lagging behind the rest of the UK, experiencing 'the relegation of environmental concerns down the list of political imperatives'. The Report goes on *'Common issues include the lack of an independent environmental agency, the absence of an environmental audit committee in the NI Assembly, and the lack of a specific environmental tribunal or at least environmental experts within the judiciary and prosecution services.'* It also highlights the potential for:

- A separate environment commissioner to be appointed who can participate in a UK-wide environmental watchdog.

- Common UK environmental frameworks to be created which must be sufficiently flexible to accommodate continued cooperation between Northern Ireland and Ireland on a North/South basis under the umbrella of the Good Friday/Belfast Agreement.

NILGA has concerns that there may be a risk of environmental governance in Northern Ireland being further weakened once we leave the EU and no longer have the oversight and enforcement of EU institutions. The Association has therefore agreed that it should support the formation of an Independent Environment Agency, and that urgent improvement to the current system is required.

We particularly note current government discussions in relation to the potential for a new governance body co-owned and co-designed by the four countries of the UK that would have jurisdiction in all four countries.

Given the lack of alternative options for Northern Ireland, NILGA considers one practical approach would be for the OEP to be extended to cover Northern Ireland. However, we believe that if done, this should be on the basis that the OEP would apply to NI until a Minister is in place, when that person can then decide whether to continue with this arrangement or present alternative proposals for Northern Ireland. Waiting until *after* a Minister is in place risks leaving Northern Ireland with significantly weaker environmental governance when we leave the EU.

The situation will be even more urgent if we leave the EU without a deal and there is no transition period. The UK Government is developing some interim arrangements for England that would apply until an OEP is set-up but there are currently no plans for these to apply to Northern Ireland.

DAERA should either request that these interim arrangements apply to Northern Ireland as well or develop alternative interim arrangements for NI. Relying only on current arrangements (i.e. civil society applying for judicial reviews) will not be sufficient to provide adequately strong environmental governance for Northern Ireland after Brexit.

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?

Additional outcomes could be:

- To significantly reduce/ halt wildlife and environmental crime.
- A minimum requirement set for outdoor education time for every child.

Other Comments

We are generally content with the 6 Draft Outcomes listed, however, the Strategy must set deadlines for these to be achieved otherwise they will remain an open-ended wish list. As previously stated objectives, targets and outcomes should be legally binding and underpinned by shorter-term targets, with appropriate resources and indicators to measure progress. The outcome for reducing greenhouse gas emissions and improving climate resilience must be strengthened.

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

Listed below are a number of 'big ideas' proposed by NILGA and others who attended a cross-sectoral workshop held by Northern Ireland Environment Link and NICVA on the Environment Strategy document. Please note these ideas are in addition to our call for the proposed Environment Strategy to have a legislative footing as outlined in response to Question 1. These additional ideas are not listed in order of preference and are all worthy of consideration:

- A Climate Change Act for NI with: Reduction Targets in line with UK legislation and other UK jurisdictions; Interim targets and carbon budgets (over five year periods); Creation of a NI Committee on Climate Change (similar to UK Committee on CC).
- All future NI Departmental Strategies and Policies (including Programmes for Government) must help deliver on our commitment to implementation of the UN SDGs with: An SDG Implementation plan for NI with specific indicators; Incorporation of the SDGs into the local council-led community and council corporate plans; Appointment of SD champions in each government department; and a dedicated office responsible for the implementation of and reporting on the (SDGs) to ensure the integration of SDGs into government policy across all government departments. The ongoing inability of one government department to regulate the activities of another may be sufficient reason in itself to look at an independent regulator.
- Creation of a Citizens Assembly on Climate Change / NI Environmental Citizens Advisory panel to improve levels of citizen information, engagement and participation in the design of environmental policies and strategies that affect NI. There could also be the option of future development into a cross-border environmental citizens advisory panel tasked with exploring an island-wide environment response as the protection and management of the environment on the island of Ireland, from our

rivers, seas, air, waste and wildlife, requires cross-border collaboration and affects all citizens.

- Creation of a 'Nature Recovery Network' – A nationwide map for nature - a spatial plan that identifies and creates the corridors and areas of habitat wildlife needs to move in order to recover. It will connect wild places and provide space for wildlife to recover and thrive. To do so will mean putting space for nature at the heart of our farming and planning systems.
- Sustainable Agri-Food Sector Support: the document acknowledges the importance of agriculture for our environment and that how we farm can have positive and negative effects but this concept is not developed further. In order to help farmers combat climate change and restore nature in our countryside, farming subsidies should provide an incentive for farmers to farm in a way that helps protect the environment and support the objectives of the Strategy. This should be progressed through a 'Public Money for Public Goods' approach. We believe that the entire Strategy needs to 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 benefit.
- NILGA is aware of the proposal from some organisations including environmental NGOs that a NI Well-Being of Future Generations Act should be created based on the Welsh example, along with the appointment of 'Future Generations Commissioner' to ensure public bodies are working towards well-being goals and produce an annual report.
While we agree with the need for a better, more contemporary approach to sustainable development and for greater buy-in from government departments on well-being, we believe this proposal would result in duplication with the current PfGNI and council-led community plans and associated reporting and audit mechanisms (driven by Part 10 of the Local Government (NI) Act 2014 and associated regulations). NILGA would therefore encourage DAERA to work with the 8 other government departments, and particularly with the PfGNI office at the Executive Office and the community planning team at Department for Communities to develop an improved and strengthened regional approach through review of current instruments and mechanisms, and development of new legislation where necessary.
- NILGA notes the proposal from environmental NGOs for the creation of a Northern Ireland 'Environment Hub' to provide a shared space for environmental NGOs which would enable more effective use of environment grant funding and more collaborative working in the sector. The Association has no strong view on this idea.

Q11: Do you have any other comments or contributions?

We would like to see the inclusion of measures/ targets to reduce wildlife and environmental crime.