

CONSULTATION

Response Document



Draft Environment Strategy

(Department of Agriculture, Environment & Rural Affairs)

18 January 2022

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Northern Ireland Environment Link
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 360 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

This response was coordinated by our Ireland Policy Group.

We welcome the opportunity to participate in this consultation and would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

1a. Do you agree with Strategic Environmental Outcome (SEO) 1: 'Excellent air, water, land & neighbourhood quality'?

Yes

We agree with the objective in principle - we all need excellent air, water and land quality, as well as safe and green neighbourhoods to thrive. As noted under our general comments, this does not provide a measurable timescale, or note by what standards it will be achieved, which should be rectified.

1b. Are you content with SEO 1 tables (1 to 6)?

No

Table 1: We welcome inclusion of the forthcoming Ammonia Strategy. This will be of vital importance to improve agricultural practices and meet national biodiversity targets.

Table 2: The target of 70% of water bodies reaching good status by 2027 is not ambitious enough and falls short of the goals set out in the Water Framework Directive for all water bodies to achieve good status, as well as other UK nations' goals. The draft strategy also lacks a time-bound target for all water bodies to reach good status. We welcome actions set out on nutrients and soils but there is no indication of the level of ambition in these actions. For example, the target for nutrient surplus in soils to be reduced by 2031 could be achieved with a very minor reduction that does not have the level of impact needed to halt and reverse biodiversity losses. This must be rectified with at least a statement of ambition but preferably measurable % goals throughout.

Table 3: The caveat that preventing deterioration and restoring the marine environment "where practical" is concerning. The goal of a healthy marine area will not be met if deterioration can continue unabated.

Table 4: Sustainable Drainage Systems (SuDs) have multiple benefits in terms of water management (decreasing flow rates to watercourses and improving water quality), improving biodiversity (providing habitat for many amphibians and invertebrates) and amenity value. SuDs should be a requirement of all new developments in Northern Ireland as in Scotland.

Table 6: Regeneration of dilapidated buildings should be incentivised over greenfield development. Brownfield sites should also be prioritised in development, subject to Ecological Impact Assessment on a site-by-site basis as brownfield sites can also provide important habitat. Dilapidated sites could all be assessed for their current and future biodiversity potential using biodiversity net gain metrics, to aid in identifying sites that could be repurposed for use as part of blue and green infrastructure networks.

2a. Do you agree with Strategic Environmental Outcome (SEO) 2: 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'?

Yes

We strongly support the introduction to this section.

Not only is this extremely important for health and wellbeing in communities, there is clear evidence that the ecology and environmental management employment sector is approaching a critical point. A shortage of applicants for key posts, especially at senior levels, is leading to mounting pressure impacting the health and wellbeing of staff as well as jeopardising the delivery of environmental initiatives. Nature recovery initiatives are at serious risk of delays due to a severe shortage of skilled and experienced ecologists. There is an urgent need to attract more of the next generation into the sector and improve diversity.

We would also highlight the importance of raising awareness among professionals in key industries, notably agriculture, commercial fishing, engineering / construction, and landscaping. Many professionals working in these disciplines have had little or no training in environmental issues, and would benefit from professional development courses. Training courses could be provided for professionals in these industries, to inform them of the importance of environmental protection, their legal obligations, and to suggest approaches that they could take to protect or enhance the environment.

2b. Are you content with SEO 2 tables (7 to 12)?

No

Table 7 - Biodiversity is currently of low priority and should be a key focus for AONBs. In the review, AONBs should be given strengthened statutory purposes to “recover, conserve and enhance natural beauty, biodiversity and natural capital, and cultural heritage” as recommended in the UK’s Glover Review.

Table 8 - We welcome the focus on inclusivity. This should also extend to those in low-income areas and further from rural areas. The time-bound measurable goals to increase access to greenspace are welcome here and should be used as a template for other target areas.

Table 11 - To make places more inclusive, diverse, vibrant, resilient and empowering we should ensure equitable access to greenspace (both in terms of amount and quality), sustainable transport routes and blue-green infrastructure.

Blue and green infrastructure needs to be planned and must include biodiversity net gain – implemented using sound ecological knowledge to ensure that such infrastructure delivers true benefits for biodiversity. Adoption of many Nature-based Solutions such as green roofs, walls and communal spaces are essential. Consideration of ecological networks must be included as a requirement of any new housing build to reduce impacts of fragmentation. These nature-based approaches will have the added benefit of providing carbon sinks, and of improving health and well-being within our communities.

Providing quality greenspace in planning can create a sense of pride and ownership in the local area that underpins its sustainability and reduces the costs to Local Authorities of damage and vandalism. Sense of pride will encourage residents to get involved in caring for their area and work with Local Planning Authorities to the benefit of all.

3a. Do you agree with Strategic Environmental Outcome (SEO) 3: 'Thriving, resilient & connected nature and wildlife'?

Yes

Creating a resilient and connected nature network is essential. The addition of ‘restored’ to the objective would be beneficial. The summary under the objective title does not recognise the urgency of the situation and the extent of the harm we have caused which should be rectified. Northern Ireland was revealed as the 12th worst performing country for biodiversity loss in a global review conducted last year¹.

¹ https://www.nhm.ac.uk/our-science/data/biodiversity-indicators/biodiversity-intactness-index-data?future-scenario=ssp2_rcp4p5_message_globiom&georegion=001&min-year=1970&max-year=2050&georegion-compare=null&future-scenario-compare=null&show-uncertainty=true&min-biigraph-y-axis=0&max-biigraph-y-axis=100

There is no mention of agriculture in this section but agricultural support will be key to achieving these goals. There is a need for a whole ecosystem approach to land use, with public money being given to halt biodiversity loss and secure net biodiversity gains, and sustainable natural resource management.

3b. Are you content with SEO 3 tables (13 to 15)?

No

Table 13 - The 30% of land protected, although a welcome goal, must be designated primarily for nature. As mentioned in the previous section, AONBs are not currently suitable without a strengthened purpose for biodiversity. The target to extend the protected areas network should also refer to restoring those currently designated as many are in poor ecological condition. Additionally, the target for the restoration of protected areas does not go far enough. In England's 25 Year Environment Plan, the goal is "*restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition*". The current goal in the draft strategy must be increased and would be more effectively worded as a percentage of total protected areas.

The woodland cover target falls far short of the Climate Change Committee's recommendations of at least 17% cover by 2050². The target should be amended to at least meet this recommendation. Woodland targets should be met using the principle of 'right tree, in the right place' using native species wherever possible of local provenance and appropriate Ecological Impact Assessments.

We welcome the forthcoming peatland strategy - the halting of damage to, and supporting restoration of peatlands is essential to halt the release of carbon from damaged, drained soils, as well as restore a highly valuable habitat.

However, the target to conserve or restore semi-natural peatlands by 2040 is not ambitious enough compared to the rest of the UK and Ireland. For example, the Republic of Ireland plans to restore all raised bog habitat by 2035. The CCC notes that "*the future inclusion of emissions from degraded peatland in the UK emissions inventory could add around 9% to Northern Ireland's total emissions*"³ which must be addressed as a priority.

We welcome the commitment to "deliver biodiversity gain". CIEEM has produced the first UK principles on delivering BNG, together with the Construction Industry Research and Information Association (CIRIA) and the Institute of Environmental Management and Assessment (IEMA)⁴. We would be very happy to work with Departments to develop proposals for tangible and consistent net gain requirements.

Table 14 - our comment on the caveat under Table 3 also applies here.

Table 15 - we would like to see a mention of the Dasgupta review here and commitment to implementing its recommendations to achieve the goal of embedding natural capital in investment.

4a. Do you agree with Strategic Environmental Outcome (SEO) 4: 'Sustainable production & consumption on land and at sea'?

No

² Climate Change Committee (2020) *Land use: Policies for a Net Zero UK*. Available at: <https://www.theccc.org.uk/publication/land-use-policies-for-a-net-zero-uk/>

³ <https://www.theccc.org.uk/wp-content/uploads/2019/02/Reducing-emissions-in-Northern-Ireland-CCC.pdf>

⁴ 8 CIRIA, CIEEM, IEMA (2016) *Biodiversity Net Gain: Good practice principles for development*. Available at: <https://cieem.net/resource/biodiversity-net-gain-good-practice-principles-for-development>

Sustainable production does not go far enough to repair the damage we have already caused to the natural environment through unsustainable land management practices. We must seize the opportunity available to deliver a restorative approach that provides public goods, recognising the need for a diversity of approaches to suit the diversity of agricultural situations around the country and greater engagement of communities, in addition to farmers.

CIEEM creates industry standard guidance for assessments of biodiversity and would welcome working with DAERA to generate such guidance for monitoring and assessment of future agricultural transition schemes. We have recently worked with Plantlife and other members of the Back from the Brink partnership to produce new guidance for farm environment advice⁵ covering undertaking farm visits and communicating effectively with farmers and land managers, management and monitoring of environmental interventions and developing a directory of habitat and species management advice. In addition, we have developed a Farm Environment Adviser Competency Framework⁶ that covers sixteen key areas of expertise including farm management practice, economics, advice and funding for environmental land management as well as ecological surveying, assessment and mapping skills. We would be happy to work with DAERA/appropriate bodies to develop appropriate training.

4b. Are you content with SEO 4 tables (16 to 24)?

No

Table 16 - More detail is required on how the development of agriculture policy will progress following the consultation. This would provide clarity for farmers/landowners and should recognise the urgent need to halt damaging practices and reward existing good practice.

Table 22 - We welcome the UK-wide approach to chemicals and commitment to build on environmental principles in the Environment Act. The Environment Act contains large exclusions in the application of the principles, e.g. in taxation and defence, which Northern Ireland can remove.

Table 23 - The importance of existing legislation for the protection of the environment cannot be understated, notably the Habitats and Birds Directives, the Water Framework Directive, Air Quality Directive, etc. In reviews of environmental regulation, the Non-regression Principle must be applied, i.e. there must be no rollback of environmental legislation and commitment to international agreements. On principles and standards, there must be no rollback on what Northern Ireland accepts as best practice and minimum standards for the environment.

5a. Do you agree with Strategic Environmental Outcome (SEO) 5: 'Zero waste & highly developed circular economy'?

Yes

5b. Are you content with SEO 5 tables (25 to 27)?

Yes

6a. Do you agree with Strategic Environmental Outcome (SEO) 6: 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability'?

⁵ <https://cieem.net/i-am/current-projects/farm-environment-advice/>

⁶ <https://cieem.net/resource/farm-environment-adviser-competency-framework/>

No

NI should strive for an ambitious contribution to net zero targets and lead by example through reform to agricultural practices, halting of damage to, and restoration of peatlands, wetlands, species rich grasslands and other high-carbon habitats, and investment in renewable technologies.

6b. Are you content with the SEO 6 table (28)?

No

The IUCN has noted *“research suggests that NbS could provide around 30% of the cost-effective mitigation that is needed by 2030 to stabilise warming to below 2°C.”*⁷ We would like to see a commitment to a Nature-based Solution approach for climate mitigation and adaptation. These should utilise a wide range of projects, such as peatland, species rich grassland, wetland and seagrass restoration, alongside woodland creation. This will support both short- and long-term carbon sinks, and biodiversity, so long as habitats are created in areas that are suited to their soil and climatic requirements and are part of a strategically planned network.

Climate actions must consider wider impacts, for example, planting of trees to absorb carbon must be subject to a full assessment of the carbon losses and gains over time, and ecological impacts.

7. Did you find the Environment Strategy content user friendly and easy to follow?

Yes

If "No", please suggest any improvements you deem appropriate.

8. Do you have any other comments or contributions?

We are very supportive of the introduction of this Strategy at an executive level, and the clear links with other strategies. We also welcome incorporation of the UN Sustainable Development Goals and commitments to integrating the post-2020 global biodiversity framework and a cross-border approach throughout the document. A wider systems-thinking approach to managing the environment is required to maximise benefits to society and nature.

We welcome the recognition by Minister Poots of the need for adequate resourcing. Local Authorities require access to in-house ecological expertise and funding to implement these initiatives in a way that will truly protect and restore nature.

It is promising that the Green Growth and Environmental Strategies will be aligned - they must both recognise the interrelated nature of the climate emergency and biodiversity crisis. Nature-based Solutions must be central. Restoration of habitats will increase carbon sequestration and storage potential and will have significant benefits for the human population.

While recognising this is intended as a high-level plan, many of the actions are not measurable in their current form, i.e. with no stated targets or timeline. This must be rectified with ambitious targets if this strategy is to be effective at urgently reversing biodiversity declines and the climate emergency.

⁷ Seddon, N., Sengupta, S., García-Espinosa, M., Hauler, I., Herr, D. and Rizvi, A.R. (2019). Nature-based Solutions in Nationally Determined Contributions: Synthesis and recommendations for enhancing climate ambition and action by 2020. Gland, Switzerland and Oxford, UK: IUCN and University of Oxford.

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