

CONSULTATION

Response Document



Northern Ireland Climate Action Plan

8th October 2025

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 7,000 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
- Wildlife and Countryside Link
- Scottish Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- UN Decade on Ecosystem Restoration 2021-2030 Network
- Greener UK
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

This response was coordinated by Members of our [Ireland Policy Group](#).

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

Consultation Questions on the CAP

1. To what extent do you agree with the quantification methodology used to calculate emissions reductions from policies and proposals?

Disagree

2. Do you have any comments on the quantification methodology used to calculate emissions reductions from policies and proposals? Yes/No If yes, please provide your comments.

Yes.

As noted by Northern Ireland Environment Link (NIEL) in their response, the greenhouse gas emission figures for NI given in the consultation and draft Climate Action Plan (CAP) are out of date and must be updated to be accurate (please see NIEL's response for details).

3. To what extent do you agree with the proposed policies and proposals to reduce emissions for the energy production and supply sector?

Disagree

We refer to NIEL's response in answer to this question, but add that this plan demonstrates an over-reliance on untested technological interventions and instead needs to make a commitment to reducing livestock to levels that are sustainable for the carrying capacity of the land with concurrent reductions in GHG emissions, reduction in pollution, and increase in soil health.

4. To what extent do you agree with the proposed approach to achieving a just transition in the energy production and supply sector?

5. To what extent do you agree with the proposed policies and proposals to reduce emissions for the transport sector?

6. To what extent do you agree with the proposed approach to achieving a just transition in the transport sector?

7. To what extent do you agree with the proposed policies and proposals to reduce emissions for the business and industrial processes sector?

8. To what extent do you agree with the proposed approach to achieving a just transition in the business and industrial processes sector?

9. To what extent do you agree with the proposed policies and proposals to reduce emissions for the residential buildings sector?

10. To what extent do you agree with the proposed approach to achieving a just transition in the residential buildings sector?

11. To what extent do you agree with the proposed policies and proposals to reduce emissions for the public buildings sector?

12. To what extent do you agree with the proposed approach to achieving a just transition in the public buildings sector?

13. To what extent do you agree with the proposed policies and proposals to reduce emissions for the waste sector?

14. To what extent do you agree with the proposed approach to achieving a just transition in the waste sector?

15. To what extent do you agree with the proposed enabling actions to reduce emissions for the agriculture sector?

Strongly disagree

Reducing greenhouse gas emissions from agriculture is vital if Northern Ireland is to meet its climate targets. The Climate Change Committee has advised that agricultural emissions must fall by 21% from 2020 to 2030, with deeper reductions - for example, halving livestock numbers by 2050 - needed under its most ambitious "Tailwinds" scenario. However, DAERA's data show that emissions from agriculture in 2023 were still 400,000 tonnes of CO₂e above 1990 levels, making it one of only two sectors where emissions have risen since the base year. This persistent lack of progress, coupled with the absence of clear targets to curb livestock emissions in the draft Climate Action Plan, highlights an urgent need for stronger action and commitment to transformation within the sector.

It is imperative that livestock numbers are substantially reduced, with government showing real leadership by tackling the root causes of agricultural emissions rather than relying on measures that only manage their impacts. The draft Climate Action Plan fails to recognise that current stocking levels are unsustainable, focusing

instead on mitigating the consequences of intensive livestock rearing rather than addressing the underlying pressures at their source.

The overreliance on technological interventions, many of which are inadequately tested, is misguided. For example, promoting slurry aeration and novel slurry treatment systems poses significant risks. While slurry aeration may reduce methane emissions by approximately 40%, depending on the system, it may also increase ammonia emissions by around 20%. This would have serious implications for Northern Ireland's peatlands, biodiversity, and human health. The explicit intention by DAERA to encourage greater use of slurry aeration is therefore of significant concern.

Northern Ireland's protected sites and priority habitats are already experiencing nitrogen and ammonia deposition beyond critical thresholds. Against this backdrop, the proposal to increase slurry aeration uptake by 50% by 2027 raises serious questions as to how such a measure has passed the Test of Likely Significant Effects under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995. Annex H of the Plan's Habitats Regulations Assessment asserts that "many of the proposals and policies in the draft Climate Action Plan were deemed to be positive or neutral to Habitats sites." However, this is in direct conflict with the proposals relating to slurry aeration. A comprehensive review by the Department, in its capacity as Competent Authority, is clearly warranted.

CIEEM makes the following recommendations:

- Land carrying capacity must be assessed to set sustainable livestock numbers, factoring in soil type, hydrology, and breed impacts (e.g. larger continental cattle causing compaction).
- CIEEM welcomes the Farming with Nature Package (Annex F), but the government must clarify funding commitments and the target area of land for inclusion in the scheme.
- Need to realign the Going for Growth agricultural strategic action plan with the Climate Action Plan.

16. To what extent do you agree with the proposed approach to achieving a just transition in the agriculture sector?

Disagree

We refer to NIEL's response in answer to this question

17. To what extent do you agree with the proposed policies and proposals to reduce emissions for the LULUCF sector?

Strongly disagree

CIEEM is concerned that the impacts of intensive coniferous forestry on biodiversity and ecosystem health, particularly of afforested peatlands, are not fully recognised, and that there is a lack of knowledge across Government on what constitutes Nature-based Solutions.

Annex F states that “sustainable forestry, including afforestation meeting the requirements of the UK Forestry Standard and open habitat restoration, is, by definition, a nature-based project.” This statement is inaccurate, as it does not align with the International Union for Conservation of Nature (IUCN) definition of Nature-based Solutions set out in Section 8.5 of the draft Plan.

Coniferous forestry plantations, such as the extensive sitka spruce plantations across Northern Ireland, cannot be considered nature-based projects. These are intensive land uses with damaging impacts and should not be classified as nature-based solutions. Under the UK Forestry Standard – General Forestry Practice Requirements, afforestation schemes must include a minimum of 5% native broadleaved trees or shrubs, 10% other tree species, and 10% open ground (or land managed primarily for biodiversity), while these requirements may be relaxed for smaller forests and native woodland. These standards fall short of the IUCN criteria for Nature-based Solutions as referenced in Section 8.5.

A significant proportion of Northern Ireland’s forest estate consists of coniferous plantations located on peatlands or peat soils. Categorising such land uses as “nature-based projects” is deeply problematic. Peatlands represent Northern Ireland’s largest natural carbon store, and robust action is required to reduce and ultimately halt greenhouse gas emissions from these areas through rewetting, hydrological restoration, and tree removal.

While we welcome the publication of Northern Ireland’s first Peatland Strategy (published shortly before the deadline for this consultation), there are a number of areas in need of improvement, some of which could be addressed in the delivery plan that is to support the strategy. The Peatland Strategy is a key component of plans to reduce emissions and increase carbon sequestration in the LULUCF sector in NI. However, critical to this is restoration of afforested peatland and the only objective for this in the strategy is to “*compile a list of afforested sites and progress restoration activities on a priority basis.*” (Action 3c). Given that a considerable proportion of the state forest is on peat soils, DAERA has a significant opportunity to demonstrate leadership by prioritising restoration of afforested peatlands. Removing forestry from peatland, coupled with hydrological restoration, is central to achieving

improvements for both biodiversity and carbon storage. For this objective to be met, it needs an ambitious SMART target in the delivery plan.

The only action in the Peatland Strategy to tackle ammonia on peatlands is, “continued research into the long-term effects of nitrogen deposition on peatlands in Northern Ireland” (Action 14c). This is not an action for reducing ammonia pollution, and it belies the fact that agriculture — in particular, livestock — is a major source of excess ammonia pollution (please see our answer to Q15). Reductions in ammonia emissions are vital to the success of the Peatland Strategy and for peatlands to be restored to a “favourable status” .

We eagerly await the delivery plan that will support the Northern Ireland Peatland Strategy. The delivery plan must include SMART targets for meeting the 26 objectives outlined in the Peatland Strategy, including a defined percentage restoration outcome, similar to the UK Strategy’s aim for 80% of heavily degraded peatland to be under restoration management.

Recommendations

- We support the commitment to produce a Northern Ireland Peatland Asset Register but it must encompass all peatland and all peat soils, including those under forestry, agriculture and urban areas, not just “semi-natural peatlands”, so as to capture all opportunities for restoration.
- A clear commitment is required to the conservation and restoration of state-owned peatlands, in line with best practice standards and international obligations.

18. To what extent do you agree with the proposed approach to achieving a just transition in the LULUCF sector?

19. To what extent do you agree with the proposed policies and proposals to reduce emissions for the fisheries sector?

20. To what extent do you agree with the proposed approach to achieving a just transition in the fisheries sector?

21. To what extent do you agree with the key findings of the Financial, Social and Economic Impact Assessments that have been carried out on the policies and proposals in the draft Climate Action Plan?

Disagree

We are in agreement with NIEL that the CAP must have specific targets for each sector in order to be effective.

Furthermore, as part of the necessary integration of Net Zero policy into all aspects of NI policy advocated by DAERA's own Green Growth Strategy and the CCC's recommendations, NI's Going for Growth agricultural policy must be aligned with this CAP and its targets.

22. To what extent do you agree with the key findings of the overarching Financial, Social and Economic Impact Assessment of the draft Climate Action Plan?

23. To what extent do you agree with the key findings of the Equality Screening and Equality Impact Assessment?

24. To what extent do you agree with the key findings of the Rural Needs Impact Assessments that have been carried out on the policies and proposals in the draft Climate Action Plan?

25. To what extent do you agree with the key findings of the overarching Rural Needs Impact Assessment of the draft Climate Action Plan?

26. To what extent do you agree with the key findings of the Strategic Environmental Assessment?

27. To what extent do you agree with the key findings of the Habitats Regulations Assessment?

Strongly disagree

(As noted in answer to Q17) Northern Ireland's protected sites and priority habitats are already experiencing nitrogen and ammonia deposition beyond critical thresholds. Against this backdrop, the proposal to increase slurry aeration uptake by 50% by 2027 raises serious questions as to how such a measure has passed the Test of Likely Significant Effects under the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995. Annex H of the Plan's Habitats Regulations Assessment asserts that "many of the proposals and policies in the draft Climate Action Plan were deemed to be positive or neutral to Habitats sites." However, this is in direct conflict with the proposals relating to slurry aeration.

Recommendation:

- A comprehensive review by the Department, in its capacity as Competent Authority, is clearly warranted.

28. To what extent do you agree with the key findings of the Regulatory Impact Assessment?

29. To what extent do you agree with the key findings of the Children's Rights Impact Assessment?

30. Can you provide any further information which will help to supplement the completion of these impact assessments? Please provide details, identifying the assessment to which the information relates

31. To what extent do you agree with the proposed target for Soil Quality?

Disagree

The Climate Action Plan (CAP) defines good soil quality as the ability of soil to function as a balanced ecosystem, supporting plant and animal life, food production, water filtration, and resilience against flooding and drought. Soil health is rightly characterised as a measure of these critical functions. However, the actions proposed within the CAP focus primarily on nutrient inputs and do not adequately address the broader range of factors required to assess or protect overall soil health.

The draft Plan recognises that Northern Ireland is at the early stages of understanding soil nutrient status, with measurement of nutrient baselines presented as a necessary precursor to further action. This approach, however, risks deferring important interventions. There are immediate steps that can and should be taken to improve soil health, notably by assessing and appropriately reducing stocking rates. This is essential to minimise nutrient loading, soil compaction, poaching, and other pressures that contribute to soil degradation. Delaying action until the soil baseline reaches 75% coverage before setting targets lacks ambition and exposes agriculture to ongoing risk.

CIEEM welcomes the establishment of a soil health indicator project. Nonetheless, it is vital that interim measures are implemented to prevent further deterioration of soils while baseline assessments and indicator development proceed. Prioritising the determination of sustainable stocking densities at the farm level is crucial. Maintaining soil health is fundamental to the long-term viability of agriculture, and inaction would present significant risk to the sector.

Recommendation:

- The CAP should commit to a comprehensive review of soil health encompassing all relevant factors, and set immediate actions to address unsustainable stocking rates in order to safeguard the foundation upon which agriculture relies.

32. To what extent do you agree with the proposed target for Biodiversity?

Strong disagree

The proposed target for biodiversity is inadequate and fails to demonstrate an ambition to meet internationally recognised targets. Achieving meaningful progress will require not only strengthened targets but also the allocation of significant resources to support delivery, particularly in light of commitments that will be set out in the forthcoming Nature Recovery Strategy.

Recent reports published by the Office for Environmental Protection (OEP) provide essential context and should inform all future action. It is imperative that all recommendations contained in these reports are implemented in full by DAERA.

The OEP's recent protected sites report¹ highlights substantial shortcomings in the current protection and management of Northern Ireland's most important natural areas, including sites such as the Antrim Hills and Rathlin Island. Although these areas hold legal status as protected sites due to their rare and threatened habitats and species, current efforts are insufficient. The number of protected features in favourable condition has declined from 61.7% in 2008 to just 51.5% in 2024, and the pace of site designation has slowed, leaving Northern Ireland trailing the rest of the UK, Ireland, and Europe in terms of protected area coverage.

Additionally, the OEP report on the drivers and pressures affecting nature in Northern Ireland² identifies land use change and pollution - mainly stemming from agricultural intensification and inefficient nutrient management - as the leading causes of ongoing biodiversity loss. The agri-food sector, without significant change, is placing unsustainable demands on the environment. Other significant contributors identified include poor waste management, resource extraction, urban development, and chemical pollution.

The OEP identifies three priority action areas for urgent intervention:

- Reducing pollution by addressing the nutrient surplus produced by farming and sewage,
- Implementing land use changes that restore habitats and reverse fragmentation, and

¹ <https://www.theoep.org.uk/report/action-urgently-needed-protect-and-restore-northern-irelands-natural-treasures-says-oep>

² <https://www.theoep.org.uk/report/drivers-and-pressures-northern-ireland>

- Reducing the region's material and ecological footprint through more sustainable resource use and management.

Recommendation:

A revised biodiversity target must be underpinned by these priorities, demonstrate international leadership, and be matched by the necessary resource commitments to deliver meaningful change.

33. To what extent do you agree with the proposed target for Air Quality?

Strongly disagree

We agree with NIEL's response that this section needs to include a clear, SMART, legally-binding target for air quality.

34. Can you provide any further information which will help us to incorporate Nature-based Solutions into our policies and proposals?

The Plan is over-reliant on existing legislation and policy frameworks to address Nature-based Solutions (NbS). This approach is insufficient to support genuine integration of NbS into current and future policies and proposals. The present document broadly reflects a business-as-usual outlook, rather than critically identifying and seizing opportunities to mainstream NbS as a means of addressing climate change impacts.

The examples of NbS presented are not ambitious and reveal a lack of comprehensive understanding across Government as to what NbS entail. For example, Annex F references a revised roadside verge management policy which increases the frequency of "don't Mow, Let it Grow" sites. However, this approach is leading to the proliferation of rank, species-poor grassland, rather than species-rich grassland capable of delivering pollinator gains and wider biodiversity benefits. Such mismanagement risks sending the wrong message to organisations working to implement best-practice management and invest resources effectively across their estates. It also undermines efforts to secure public buy-in for operational changes that can deliver substantial benefits for biodiversity.

Furthermore, as stated in answer to Q15, we disagree that intensive coniferous forestry can be considered a "nature-based project", particularly in areas where forestry is on peatland which is a critical carbon sink in NI, and which should be extensively restored as a matter of priority. Doing so is within the gift of DAERA and is a clear opportunity to demonstrate international leadership.

Recommendation:

- There are good examples of NbS best practice available, and CIEEM encourages DAERA to seek and engage with these.
- We also suggest seeking guidance from bodies such as Northern Ireland Environment Link, as well as engage with and employ good practice guidance such as CIEEM's recent and ongoing series on "[Rebuilding Nature: Good Practice Guidance for Ecological Restoration](#)"

35. To what extent do you agree with the proposed governance arrangements to support the delivery of the Climate Action Plan?

36. To what extent do you agree with the proposed approach to monitoring and reporting on policies and proposals?

37. Do you have suggestions about other actions that we should be taking across the public sector?

Yes

DAERA is one of the biggest landowners in Northern Ireland and it is within its gift to make a significant contribution to action for climate and biodiversity by removing conifers from and restoring peatland in NI.

(As stated in answer to Q17) DAERA should undertake a comprehensive assessment of its current forest estate to identify opportunities for peatland restoration. A clear commitment is required to the conservation and restoration of state-owned peatlands, in line with best practice standards and international obligations.

38. To what extent do you agree with the actions that we are taking to enable the transition to net zero?

39. To what extent do you agree with the assessment of the costs of implementing this Climate Action Plan?

40. Do you have any other information to inform this cost assessment?

Yes/No If yes, please provide details

41. To what extent do you agree with the proposed approach to establishing a Just Transition Fund for Agriculture?