

CONSULTATION

Response Document



Northern Ireland's Nature Recovery Strategy

15th April 2026

(formerly 18th March 2026)

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
- Society for the Environment
- UN Decade on Ecosystem Restoration 2021-2030 Network
- National Biodiversity Forum (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.

Do you agree with the five strategic objectives in the draft Nature Recovery Strategy?

While the strategic objectives and additional actions provided in this strategy cover several important and necessary steps, we feel clarity of the strategy is undermined by a lack of specificity of actual desired outcomes.

Further, for this strategy to make meaningful progress towards nature recovery, it must be accompanied by SMART (Specific, Measurable, Achievable, Relevant, and Time-bound) actions for practical, on-the-ground, delivery. Perhaps these could be provided in an accompanying delivery plan which breaks the strategy down into deliverables. Each of these should be assigned a named public body who is responsible for delivery.

This recommendation for SMART actions is shared by the Office for Environmental Protection (OEP) in their response to this consultation¹. They also call for greater clarity on the outcomes that DAERA wants to achieve. Clear statements of intended outcome-based targets in this strategy will be key for setting out coherent SMART actions to achieve them and as a mechanism to monitor effectiveness.

We welcome the intention to increase the money available for restoring nature, but we would like to see details. Critical to this will be an assessment of the cost of actions and the ecological capacity required to deliver them. It is widely accepted that there is an existing gap in ecological expertise in Northern Ireland, but an evaluation of the gap relative to the action required to make progress towards recovering nature, as outlined in this strategy, would provide an important initial target for growth in the sector.

While many of the elements of a strategy for nature recovery are in here, we agree with the OEP's assessment that there is an over-reliance on developing further new strategies and plans. Crucially, they point out that producing additional documents will not achieve the conservation of biodiversity duties under sections 1 and 2 of the Wildlife and Natural Environment Act (Northern Ireland) 2011.

We also agree that many of the actions required for nature recovery are well-evidenced and require immediate implementation. Delaying investment in nature recovery, a critical aspect of national security, is resulting in accumulation of ecological debt which will become more difficult and more costly to address. As the OEP says, "ecological recovery requires sustained and reliable investment over time...established from the outset."

¹ <https://www.theoep.org.uk/report/oep-welcomes-draft-nature-recovery-strategy-northern-ireland-calls-greater-focus-action>

Accordingly, we urge a significant rewrite of this strategy, providing clarity on the intended outcomes, associated targets, and providing detailed, achievable and time-bound actions to meet these.

Please note that in addition to this CIEEM-specific response, we have contributed to and support Northern Ireland Environment Link's (NIEL) response.

Strategic Objective 1: Well Protected Nature and Accelerated Restoration

Commented [1]: Includes reference to: protected sites, species recovery, 30 by 30, peatland restoration, land use, conservation traineeship scheme, pollinators.

Q. Do you believe that the proposed new actions for Strategic Objective 1, when considered with existing targets, will deliver Well Protected Nature and Accelerated Restoration?

No.

Q. Are there any additional actions that you would like to be included with Strategic Objective 1?

We would like to see the addition of SMART target-outcomes/actions for increasing (a) the extent of, and (b) condition of, protected sites.

We also want to see the addition of actions to expand the area of priority habitats and increase the abundance of species outside designated sites. Most opportunities for nature restoration are outside of protected sites, including engagement and learning opportunities. While we note the assertion in the strategy that 'species abundance must increase', this is not presented as a SMART outcome-based target), and there is no mention of the EIP action to create or commence restoration of 20k ha of wildlife rich habitat outside the protected site network by 2030.

An action to expand and increase habitats and species will necessarily be preceded by a cohesive and comprehensive programme of recording and monitoring what is present in NI (a critical outcome-target/set of actions under SO5).

Commented [2]: Make sure this is reflected in answer to SO5

We support the OEP's recommendation for an action for public bodies owning significant areas of protected sites to lead by example in seeking to deliver the EIP target to improve ASSI condition.

We would also like to see an additional action to **introduce a framework for OECM nominations and monitoring**. OECMs are widely regarded as an important component of ensuring that at least 30% of land and freshwater is protected, connected and managed for nature by 2030. All other nations of the UK are already some way towards trialling frameworks for OECMs.

The groundwork for OECM-style frameworks already exists and action should not wait; the OEP highlights work by the IUCN National Committee UK, and we note work by Northern Ireland Environment Link in contributing to a report on progress towards 30 by 30².

Q. Do you have any other comments about Strategic Objective 1?

The proposed actions must be strengthened into SMART outcome-based targets; for example, “develop” should be replaced by “publish”, “explore” should be replaced by “report publicly on”.

Again, we refer to the importance of having detailed actions for delivery for this strategy if it is going to be more than a paper exercise. Below we provide several recommendations which would be appropriate for a delivery plan and which would strengthen our confidence in this strategy.

While a **Protected Sites Delivery Plan** is rightly included in this strategy, we echo the OEP’s call that the action to *implement* and not just develop the plan be made explicit in this strategy.

Furthermore, it is not necessary to wait for the plan’s publication before addressing the recommendations of the Third SPA Review Phase 2 report that the Antrim Hills SPA (geographical extension and inclusion of Curlew as a feature) be extended and a new SPA (for Curlew) in Lower Lough Erneare be created. This could form the basis of a SMART action in a delivery plan for this strategy.

As any project manager knows, it’s important to scope requirements for a project including budget and capacity: this strategy is no different. As per the OEP’s recommendations, we want to see a sound **assessment of resourcing requirements for the actions in this and associated strategies**, including for protected sites. Such an assessment is necessary for clear-headed decision-making regarding the resourcing of DAERA to carry out its responsibilities, including monitoring and enforcement action.

We welcome the action to convene a **Nature Recovery Forum** but, again, we want to see this given as a time-bound commitment. Given the urgency of action needed, this forum should be convened as a matter of high priority and must include representation from professional ecologists who have practical experience of the application of policy in the field.

We welcome the action (under SO5) to consult on a **statutory requirement to monitor protected sites**. This would present a rare opportunity for Northern Ireland to lead in environmental protection. Such a duty is not the norm in other nations of the UK, but environmental regulators, including the OEP in NI, have recommended it

² https://www.wcl.org.uk/assets/uploads/0/WCL_04_30x30Report2025_DIGITAL.pdf

be introduced. It would ensure that monitoring is systematic and proactive, covering all relevant protected sites and features, so that condition and trends can be reliably tracked over time and inform management or identify non-compliance in a timely manner. It would also act as a driver for improved data that will inform other frameworks and initiatives, such as the Land Use Framework and Farming with Nature Scheme.

Action to expand the green workforce is urgently needed, but the action to “explore options” for a **conservation traineeship scheme** needs to be made SMART and outlined in more detail. In 2021 we asked ecological consultancy employers about their experience of filling positions³. They reported difficulty in recruitment in the previous 2 years and all but one respondent said they have had to turn down work opportunities due to an inability to fill ecological vacancies. CIEEM will this month publish a report on detailed research to accurately identify areas and actions to increase future capacity in the ecology sector. We are very happy to engage further on this.

Commented [3]: This is an action from the NRS which seems rather weak; is there a better recommendation we can take from the capacity report?

Strategic Objective 2: **Reduction of the Pressures on Biodiversity**

Q. Do you believe that the proposed new actions for Strategic Objective 2, when considered with existing targets, will deliver Reduction of the Pressures on Biodiversity?

No.

Q. Are there any **additional actions** that you would like to be included with Strategic Objective 2?

Commented [4]: Includes reference to: Climate Change and CAP, nutrient pollution, DRS, clean air, INNS.

Commented [5]: The Strategy’s additional actions cover improving air quality, reducing waste materials, and controlling INNS.

We do not consider that the pressures on NI’s biodiversity, as outlined in the OEP (2024) report, have been comprehensively addressed in this strategy, in particular, pressures from nutrient pollution, but also from urban expansion and associated recreational pressures (regarding the latter, please see our comments on BNG under SO3).

The OEP report identified expansion of intensive agriculture as the most impactful land use change in NI through both loss of habitat and as a major source of pollution including from slurry, ammonia emissions, and associated water quality issues.

³ <https://cieem.net/wp-content/uploads/2022/08/Current-capacity-crisis-in-the-ecological-sector-CIEEM-Breifing-Paper-Final-1.pdf>

We recognise the economic, cultural and social importance of agriculture in NI and it is with these in mind, as well as nature restoration that we urge the inclusion of an action for a **transition towards regenerative agriculture / nature-friendly farming**.

The Growing for Growth Strategy of the 2010s has resulted in an extraordinary expansion of intensive agriculture and has come at an unsustainable cost of the integrity of the ecology — in particular, soil ecosystem health — that supports food production in NI. DAERA have clearly recognised this fact, but the actions proposed fall short of addressing the issue.

In their 2025 report on Regenerative Agriculture, the British Ecological Society (BES) found clear evidence that by improving the health and resilience of soils, reducing erosion and runoff and diversifying farming systems, regenerative approaches can lead to more long-term financial stability for farmers, as well as improvements to the natural environment.

There are **already farmers in NI** who have been leading in the development of regenerative practices but who **face substantial challenges**, not least from an economic system that undervalues their contributions to the public good.

Commented [6]: links, references

Commented [7]: Is there research available on the challenges facing nature-friendly farmers in NI?

Critical to a transition to regenerative agriculture will be, of course, outcomes-focused payments issued through the Farming with Nature scheme which support agriculture to produce food in an ecologically-sustainable way.

Also important is support for peer-to-peer learning as well as collaboration and knowledge exchange between farmers and expert ecologists. This will be key to maximising the positive contribution of agriculture to the protection and enhancement of protected sites. We support the OEP's recommendations for one-to-one expert advice, long-term agreements, and ASSI condition targets, as well as the inclusion of Management of Sensitive Sites (MOSS) programme in this strategy (omitted in this current draft).

Q. Do you have any other comments about Strategic Objective 2?

Delays to the publication of the **Ammonia Strategy** and the **Nutrient Action Plan (NAP)** undermine this objective. While the former is referred to in this draft strategy, the NAP is **conspicuously absent**, despite it being a key pillar of efforts to address nutrient pollution from agriculture, one of the biggest pressures on biodiversity in NI. We want to see the recommendations of the OEP⁴ addressed and explanation be provided where recommendations are not adopted in the (now overdue) NAP.

Commented [8]: Check

⁴ <https://www.theoep.org.uk/report/oep-gives-advice-daera-minister-nutrients-action-programme-regulations-consultation>

With regards to the Ammonia Strategy, we note the OEP's concern that the proposals in that draft are "unlikely to reduce ammonia concentrations below critical thresholds", and we expect to see that the OEP's recommendations for improvement are included in the final strategy.

In response to the consultation on the draft **Climate Action Plan (CAP)** we expressed alarm at the suggestion of technologies which could reduce methane, but increase ammonia emissions (an admission made explicitly in the CAP). This does not reflect joined-up decision making across government regarding ammonia reduction which is critical if this pressure is to be addressed.

Also in our response to the CAP consultation, we pointed out the easy-wins which were missed by the **Peatland Strategy**. Restoration of peatlands is fundamental to climate adaptation in NI, yet there is no commitment in the Peatland Strategy to restoring afforested peat on government-owned land, despite this being an action that is in the gift of government.

Commented [9]: Halt and reverse inappropriate afforestation of peatland (OEP, 2025, p42)

We welcome the commitments to a new **Invasive Species Strategy and All-Ireland Plan**. However, many of the actions related to prevention and management of the spread of INNS are already well-understood and require urgent implementation, i.e. prevention, early-detection, rapid response, then long-term management. We want to see commitments to practical actions beyond development of strategies/plans in this strategy and/or an accompanying delivery plan.

When it comes to developing the INNS strategy, it must: (1) set out SMART actions; (2) identify the priority species and threats; (3) name those responsible for delivery; (4) integrate lessons from what has worked so as to avoid repeat mistakes; and, (5) outline monitoring and accountability.

Strategic Objective 3: Sustainable Use of Biodiversity through Nature-friendly Policies and Practice

Commented [10]: Fisheries management, tree cover, Farming with Nature, BNG

Q. Do you believe that the proposed new actions for Strategic Objective 3, when considered with existing targets, will deliver Sustainable Use of Biodiversity through Nature-friendly Policies and Practice?

No.

Q. Are there any additional actions that you would like to be included with Strategic Objective 3?

There is no mention of the **NI Food Strategy Framework** or its action plan in this strategy, and therefore no indication of how that will align with this strategy, which seems to be an oversight.

Q. Do you have any other comments about Strategic Objective 3?

As we have said of the other SOs, the proposed action to “explore and review” options around the adoption of a **biodiversity net gain approach** is too vague to be actionable and should be strengthened to “report publicly on”, otherwise this is not a commitment in any meaningful sense.

We would like to see detailed actions associated with this target, which should include engaging with stakeholders, including ecologists. CIEEM welcomes the action to explore and review options in relation to adoption of a biodiversity net gain (BNG) approach within the planning system.

There are many considerations to make and CIEEM has years of experience in engaging with these across the UK and Ireland, and we are ready to assist with this action. Please find some relevant references below:

- [CIEEM Briefing Paper: Biodiversity Net Gain in Ireland](#)
- [BNG in the Island of Ireland: Survey results report, August 2025](#)
- [Biodiversity Net Gain: Good Practice Principles for Development, A Practical Guide](#)
- [Biodiversity Net Gain: Good Practice Principles for Development](#)

In relation to the existing target to **increase NI woodland cover to at least 9%** (124,000 hectares) by 2030; we have expressed concern in other consultations at the continued reliance on inappropriate planting of trees, often non-native conifers, such as Sitka Spruce, which can be invasive on peatlands. While the **Tree Planting Action Plan** committed to in this draft strategy is important, we urge a focus on protection and restoration of existing woodland as a priority. Beyond that, woodland expansion should be aligned to NI Priority Habitat Types.

We welcome the intention to **expand the Farming with Nature Package** to focus on protected sites and landscape-scale collaboration for improved environmental outcomes, but the government must clarify this commitment by providing specific targets for expansion and funding commitments to provide farmers with the necessary confidence to engage.

Strategic Objective 4: Nature Valued and Mainstreamed Across All of Government and Society

Q. Do you believe that the proposed new actions for Strategic Objective 4, when considered with existing targets, will deliver Nature Valued and Mainstreamed Across All of Government and Society?

No.

Q. Are there any additional actions that you would like to be included with Strategic Objective 4?

SO4 should drive the mainstreaming of **nature-based solutions** (NbS); however, while we note references throughout the strategy to NbS, the IUCN description of NbS on page 19 is generic, and we are concerned that there is a lack of knowledge across government on what constitutes NbS. We would like to see an action for Northern Ireland-specific guidance for mainstreaming of nature-based Solutions with examples of what NbS look like in a range of contexts in NI.

In response to SO2 we noted the missed opportunity in the Peatland Strategy to include actions for public bodies to restore peatland on the land they own. More broadly, we would like to see more emphasis in this strategy on land-owning public bodies, such as the Forest Service, **leading by example in restoring habitats** on their land rather than repeating the mistakes of the past and further deteriorating habitats, especially across upland landscapes.

We welcome the actions to consult upon and seek Executive support for a duty to report on the implementation of the biodiversity duty; however, we would like to see the addition of an action to **provide guidance for implementation of the biodiversity duty** as this will be necessary to ensure it is implemented well and with the intended outcomes. This is echoed by the OEP who say that the strategy could be improved by, "...drawing public bodies' attention to their legal duty...to have regard to the Strategy in complying with their biodiversity duty, and by explaining how they should do so".

Q. Do you have any other comments about Strategic Objective 4?

As a general rule, targets and actions across this and connected strategies should be assigned to named public bodies so as to reinforce accountability. This includes clear allocation of responsibilities within DAERA and specifically between DAERA and the NIEA.

Commented [11]: Natural Capital, Green Finance, Circular Economy, behaviour change, Biodiversity Duty, nature restoration targets.

Commented [12]: The OEP flags an "inconsistent and potentially confusing approach to collating relevant actions", a failure to distinguish between targets and actions, the absence of references to legally binding water body objectives from River Basin Management Plans, and "lack of clarity about the status of targets and actions, which may cause confusion amongst delivery bodies and impede effective implementation and monitoring."

We welcome the actions to consult upon **setting targets in law for Nature Restoration** and related civil sanctions by 2027, and seek executive support by 2028; however, given the timelines for development of similar targets elsewhere in the UK, this suggests that targets might not be in place before 2030. Given this, we again refer to the need for a delivery plan and the inclusion in that of an action to begin development of targets in consultation with stakeholders immediately so that there is as little delay as possible to put these in place.

The action for development of a **framework and standards for high-integrity environmental markets** is important; key to the success of a framework will be the identification of what exactly NI wants to achieve with nature finance, specifically clarity on the desired ecological and other (e.g. health) outcomes. This is the foundation of a high-integrity environmental market and should be done in consultation with professional ecologists and environmental NGOs. Again, this would be a good action for a delivery plan.

Strategic Objective 5: Building Strong, Integrated Evidence and Knowledge to Enable Action and Reporting for Nature

Commented [13]: monitoring, data, evidence, baselines, mapping, biodiversity indicators.

Q. Do you believe that the proposed new actions for Strategic Objective 5, when considered with existing targets, will deliver in Building Strong, Integrated Evidence and Knowledge to Enable Action and Reporting for Nature?

No.

Q. Are there any additional actions that you would like to be included with Strategic Objective 5?

We support NIEL's call in their response for a commitment to long-term ecological monitoring and a publicly-accessible and coherent evidence framework which integrates data from the spectrum of stakeholders, including landowners, farmers, NGOs and statutory bodies.

We also support NIEL's call for annual public reporting on biodiversity indicators; both these actions would go some way to addressing the evidence and accountability gaps.

Q. Do you have any other comments about Strategic Objective 5?

To ensure that SO5 genuinely underpins nature recovery, the Strategy should make clear that if monitoring shows progress is off-track, this will trigger a timely review

and strengthening of actions and targets, rather than simply reporting failure. Monitoring must be directly linked to management response.

Q. Are you aware of any other existing targets for nature recovery that may help deliver for SO1 – SO5 that you feel have been omitted from this draft strategy?

The OEP response reminds the DAERA that it is under a legal obligation to designate a strategy for the conservation of biodiversity. We are therefore concerned that this draft implies that the strategy will not be renewed when it expires in 2032. While it is important that the next iteration of NI's Nature Recovery Strategy aligns with Third Climate Action Plan 2033 – 2037, the actions for biodiversity should not be subsumed under those for climate; they should be given an equal footing in legislation and policy so that one doesn't take precedence over the other.