

ABOUT YOU

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Mountaineering Ireland

Q1a: Do you agree with Strategic Environmental Outcome (SEO) 1: ‘Excellent air, water, land & neighbourhood quality’?

Yes

No

Comments

Mountaineering Ireland welcomes the development of Northern Ireland’s first Environment Strategy and agrees with this outcome, however our support should be qualified by making clear our serious concern that the strategy does not map out the steps required to achieve this outcome. Much of the change needed is dependent on other strategies - e.g. Ammonia Strategy and the Clean Air Strategy and it is not clear what the mechanism will be to ensure that the implementation of these strategies will converge to deliver the outcome (SEO1). The structures to drive delivery of this strategy, including a dedicated within DAERA, working closely with the Green Growth division, will be necessary to achieve the transformative change that is essential in response to the global and national climate and biodiversity emergencies.

Q1b: Are you content with SEO 1 tables (1 to 6)?

Yes

No

Comments

The structure of this plan provides no confidence that the outcomes will be achieved. There is a lack of clear and measurable targets, no organisation is assigned responsibility for delivering on the actions and targets and there are no timelines attached.

In the few cases where more specific targets are provided some do not align with existing targets e.g. 'By 2027: 70% of water bodies at Good Status', when the Water Framework Directive target for Northern Ireland is 100% at Good Environmental Status by 2027. Despite that, there continues to be a decline in water quality in freshwater catchments across Northern Ireland, with much of this to do with intensive agriculture.

The impact of ammonia is also treated too lightly, the draft strategy acknowledges that emissions increased by 20% from 2010 to 2017 and that the majority of sites designated for nature conservation are experiencing ammonia concentrations and levels of nitrogen deposition at which damage to plant life may occur.

There is need for ambition, urgency and commitment, expressed through SMART targets throughout the strategy.

Q2a: Do you agree with Strategic Environmental Outcome (SEO) 2: 'Healthy & accessible environment & landscapes everyone can connect with & enjoy'?

Yes

No

Comments

As the representative body for hillwalkers and climbers across the island of Ireland, having a healthy and accessible environment and landscape is fundamental to Mountaineering Ireland's concerns.

There are many dimensions to this - including the need for greater clarity and certainty regarding recreational access, and how the quality of people's recreational experiences is diminished when the environment and landscape are not in good condition.

Mountaineering Ireland welcomes the statement of fact that our environment is our single greatest asset. Within that overall asset, mountains, upland and coastal areas are very significant elements of the landscape, which should be valued and protected as environmental, cultural and recreational assets.

Q2b: Are you content with SEO 2 tables (7 to 12)?

Yes

No

Comments

7. Connecting People to the Environment: Landscapes, Seascapes & Natural Beauty:

Again, the actions and targets need to be clear, measurable and timebound with a lead body.

The actions should include:

- Putting Northern Ireland's AONBs, our premier landscapes, on a statutory footing - to date this designation has been largely ignored;
- Access to adequate multi-annual funding for AONB management bodies to develop and implement stronger management plans for their respective area;
- The development of an integrated land-use strategy for NI, ideally within 2-3 years.

8. Connecting People to the Environment: Outdoor Recreation & Natural Space Provision

It's notable that there is more detail in this section than others, which seems appropriate. There is much to welcome within the proposed actions. In addition to timebound actions with responsibility assigned we submit the following comments:

- Rather than trying to amend the current legislation on access, a new Outdoor Recreation Bill should be introduced to provide a comprehensive legislative framework to support the development of outdoor recreation in Northern Ireland.
- Due to the significant growth and change in the outdoor recreation sector over the last 10 years a new Outdoor Recreation Strategy should be developed, rather than an updated Action Plan.
- An obligation on all councils to develop Community Trail Plans, including for rural areas where most people are currently dependent on travelling by car to recreation sites.
- Environmental NGOs and outdoor recreation governing bodies play a key role in connecting people with the environment and encouraging responsible recreation, this should be acknowledged and supported.
- Expand outdoor recreation opportunities through incorporating recreation in future farm payment schemes. This is likely to be needed to deliver the future vision of 'Landowners and managers are enabled to provide informal outdoor recreation on their properties without significant disruption to their business.' Note that landowners should be enabled to provide 'both formal and informal outdoor recreation' (many outdoor recreation activities such as hillwalking, rock climbing, kayaking, mountain running and caving are largely dependent on informal access, rather than formal recreation using signposted trails and other outdoor recreation infrastructure).

By 2050

There appears to be a mis-alignment of the 'By 2050' targets below, or a typographical error:

90% of the population visiting the natural outdoors at least once a week.

Every child aged 4-11 spends 1+ hours in nature rich settings each month.

The target for children (based on a monthly measure) is way too low, it should be noted that the UK's Wildlife Trusts have called for every child in the UK to spend one hour every day outside in nature, which seems appropriate as a 2050 target.

10. The next generation

It is welcome to see the proposed use of the public estate (DAERA sites) as places for outdoor environmental education. The renewal (and in some cases reopening) of publicly owned outdoor education centres should be explored, to avert the need to build new facilities at other sites.

Q3a: Do you agree with Strategic Environmental Outcome (SEO) 3: 'Thriving, resilient & connected nature and wildlife'?

Yes

No

Comments

We agree in principle, however the wording of the outcome seems a little awkward.

Q3b: Are you content with SEO 3 tables (13 to 15)?

Yes

No

Comments

13. Protecting nature on land

While a target of 30% of land and water protected for nature by 2030 is certainly desirable, its achievement will require significant structural change within Northern Ireland and an immediate redirection of resources. Separate targets should be established for land and water. While there is reference to 'much' of the current 8.9% protected area being in favourable condition there should be greater transparency around this – the 2019 consultation document for the Environment Strategy gave the figure under favourable management, a shocking 0.18%. Transformational change is required.

Peatland conservation and restoration should be accorded priority, to protect and enhance carbon sequestration and carbon storage, and to improve biodiversity. The target of functioning ecosystems by 2040 does not seem to align with the 2020 recommendation of the UK Climate Change Committee (CCC) that all upland peatland within a SSSI (or ASSI) was to be under restoration before 2023. This target should be reviewed.

The target for woodland cover at 8.8% is nowhere near as ambitious as it should be, given that current levels are just over 8%. The target should align with the commitments under the Forests for our Future programme. There should be targets for expansion of native woodland, more sustainable management of commercial plantations, protection of hedgerows and establishment of agroforestry.

The primary land use across most of Northern Ireland's land area is agriculture. Biodiversity must be improved on each and every farm, starting with a reduction in the severity and frequency of hedge cutting. Set a specific percentage for biodiversity-rich habitat for all farms e.g. 5% (excluding hedgerows) and support farms to do this via the Single Farm Payment.

The Environment Strategy should mandate improved Environmental Reporting, especially in relation to habitat condition.

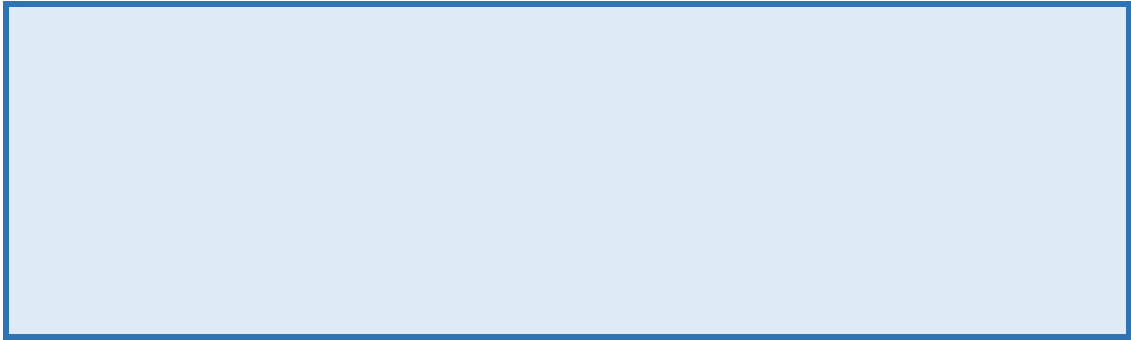
The sanctions for environmental crime, including habitat destruction should be strengthened and implemented, based on the polluter pays principle.

Q4a: Do you agree with Strategic Environmental Outcome (SEO) 4: 'Sustainable production & consumption on land and at sea'?

Yes

No

Comments



Q4b: Are you content with SEO 4 tables (16 to 24)?

Yes

No

Comments

16. Future Agricultural Policy

Mountaineering Ireland recognises that consultation is underway regarding the Future Agricultural Framework, however the Environment Strategy should as a minimum identify key areas of linkage between this strategy and the Future Agricultural Framework and make clear the intention to update the Environment Strategy with specific targets as they are agreed.

There should be mention in the Future Vision / Outcome of the provision of outdoor recreation opportunities, which should be included within the public goods measures eligible for funding through future farm support payments. There has been good work done to explore how such payments could include hard and soft measures (e.g recreation infrastructure and visitor engagement) contributing to higher quality experiences for both farmers and the public, as well as providing farm income and improved public understanding of agriculture.

21. Carrier Bags

Include a target based on the use of revenue from the Shopping Bag levy for Environmental Projects, Mountaineering Ireland accessed funding under the Challenge Fund for environmental education publications, prior to a change in the funding criteria (https://www.mountaineering.ie/files/2015105141616_d91eaa89.pdf and https://www.mountaineering.ie/files/202131212753_be183ca6.pdf, it would be good to see access to this scheme broadened.

Q5a: Do you agree with Strategic Environmental Outcome (SEO) 5: 'Zero waste & highly developed circular economy'?

Yes

No

Comments

Q5b: Are you content with SEO 5 tables (25 to 27)?

Yes

No

Comments

27. Illegal Waste Disposal & Fly-tipping

It is concerning that over 10 years later the Waste & Contaminated Land Amendment Act (NI) 2011 is still awaiting commencement, and we do not yet have a clear approach to fly-tipping across all council areas. Given the scope of this strategy, and the need for stronger enforcement in other areas, the reasons for this delay must be understood and lessons applied to enable more expedient implementation of future environmental legislation.

Q6a: Do you agree with Strategic Environmental Outcome (SEO) 6: 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability'?

Yes

No

Comments

Q6b: Are you content with SEO 6 table (28)?

Yes

No

Comments

28. Climate Change

This is the defining challenge of our time, and this decade is absolutely critical. There should be a clear timeline for bringing forward a Climate Change Act for Northern Ireland.

Under Future Vision, there is a reference to meeting the requirement of the UK Climate Change Act 2008, the Strategy should instead commit to achieving whatever targets are set by any future NI Climate Change Act.

Q7: Did you find the Environment Strategy content user friendly and easy to follow?

Yes

No

If “No”, please suggest any improvements you deem appropriate.

Initially, the graphic-based presentation seemed appealing, however the presentation of targets and actions would be more user-friendly in a tabular format, with actions numbered.

The absence of any reference to the mechanisms and resources to ensure implementation of the strategy is a troubling omission given the scale and import of this strategy.

The relationship between this strategy and Green Growth, and between the Environment Strategy and the various strategies, action plans and programmes which will sit under the Environment Strategy needs to be clear. Mountaineering Ireland draws attention to the value of the UN Sustainable Development Goals graphic on page 10, which clearly positions the Biosphere as the basis to Societies and in turn Economies. This hierarchy should not only underpin the Environment Strategy, but also assist in resolving conflict with other strategies. It expresses the important and irrefutable statement at the start of Section 3 in this draft strategy - Our natural environment is our life support system and our greatest asset.

The need for clear and measurable targets with timelines for delivery and responsibility assigned has been expressed already.

Q8: Do you have any other comments or contributions?

Sadly, DAERA and its ministers have a poor track record of delivering environmental protection and improvement. Indeed, all the measurements suggest that they have consistently overseen environmental decline. It wasn't for lack of funds – the EU CAP provided millions of pounds to encourage changes in environmental management, but all we got was further decline.

There appears to be too much reliance on the OEP not only to robustly scrutinise the implementation of this strategy but also to interpret and apply a legal basis for sanctions under the UK Environment Act. Surely the NI Executive must take more seriously its responsibility for this duty of care toward its own environment?

New Decade, New Approach says that further to bringing forward a climate change act “The Executive will establish an Independent Environmental Protection Agency to oversee this work and ensure targets are met.” This should be a cornerstone objective of Northern Ireland’s first Environment Strategy.

If we truly recognise our natural environment as the basis for human living, and by extension, the basis for society and economy, then the ambition and quality of governance in the Environment Strategy must reflect that. While this draft strategy has much worthy content, in its current form it fails not just our aspiration to improve and enhance our environment, but risks being a mandate for continuing environmental decline.

We hope that our comments will assist the process to finalise this important strategy and thereby protect and enhance Northern Ireland’s natural environment so as to secure the multiple benefits the environment provides for everyone.