

Environment Strategy Response NFFN NI

The Nature Friendly Farming Network (NFFN) is a farmer led independent organisation, uniting farmers across the UK who are committed to managing their land for wildlife and the public good at the same time as growing and providing nutritious, healthy food. The Network represents over 250 members in Northern Ireland in the form of a Steering Group. The NFFN welcomes the publication of Northern Ireland's Draft Environment Strategy which must succeed in delivering significant improvements in the state and quality of Northern Ireland's natural environment. We welcome the aims of the strategy to tackle the major challenges of biodiversity loss, climate change and environmental degradation across the breadth of the Executive. We also welcome the recognition that a healthy environment is linked with our health and well-being and that long-term planning is essential to protect and restore natural capital for future generations and the fact that nature friendly farming is seen as a key vehicle in securing the outcomes it seeks to deliver.

However, the Executive has failed to deliver on a range of previous environmental commitments, with significant impacts on nature and the environment. Water quality is going backwards, over one in ten species faces the risk of extinction and nearly all of our best sites for nature are failing to meet good condition. This situation must not continue, if we continue to erode our natural capital, which is the foundation of a stable prosperous economy, we will all be poorer as a result.

Whilst an Environment Strategy for Northern Ireland is essential, it must be fit for purpose in securing the restoration of nature and widespread improvement in the natural environment. To achieve this, it requires a long-term vision, with clear actions and sufficient investment; clear and measurable milestones to evaluate success; alongside robust governance mechanisms to oversee and scrutinize its implementation. These core components are a pre-requisite to success and must be put in place.

Although the draft Strategy contains a range of welcome strategic environmental outcomes, there is a clear need for increased ambition in order to effectively rise to the challenge of addressing the nature and climate emergency, with clear actions and targets drive this forward across the Executive. There are several improvements that must be made to ensure that the strategy provides the required level of ambition and is focused on meeting specific environmental outcomes. Furthermore, the Strategy must be underpinned by domestic legislation, in order to provide a duty on all Ministers to meet the targets which are established at the outset.

As the NFFN are a farming organisation, the scope of our response focuses specifically on the Strategic Environmental Objectives (SEO's) in which farming has an important role to play in achieving them, whilst highlighting opportunities to further secure the protection and restoration of Northern Ireland's natural environment through nature friendly farming.

Key points

- **Commence and fully implement the Environment Act 2021 in Northern Ireland:** DAERA must bring forward the draft Commencement Order for the Environment Act 2021 as soon as practicable to the NI Assembly to ensure that the Environment Strategy can be adopted as Northern Ireland's first environmental improvement plan (EIP)
- **Legislate for nature's restoration:** non-binding targets have so far failed to deliver the necessary step-change for nature. The Environment Act 2021 alone is insufficient for responding to the nature crisis. The Executive must and legislate for binding interim, and long-term targets in law for nature's restoration

- **Establish an independent Environmental Protection Agency (EPA):** Implementation of the OEP does not lessen the need for an independent EPA for Northern Ireland. Whilst the OEP will be responsible for oversight of public authorities regarding the Environment Strategy, the independent EPA would have complementary remit over the implementation of targets and actions by businesses and individuals
- **Adequately resource implementation and monitoring of the Environment Strategy:** to be effective the Environment Strategy must have dedicated, and long-term resourcing. An expert team should be established within DAERA to drive ambition and action across the Executive, as well as develop and carry out robust and transparent monitoring
- **Make the strategy SMART** Targets and actions for all departments and SEOs must be specific, measurable, achievable, relevant and timebound (SMART). A SMART strategy will also be beneficial in supporting robust and transparent monitoring and reporting by both DAERA and the OEP

Response to questions

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

Yes, subject to comments below, including improvement of targets actions and outcomes

Whilst the overarching vision for air, water, land and neighbourhood quality is welcome, the targets and actions that have been designed to meet this vision are insufficient. Our comments focus specifically on the clean air strategy and efforts to address ammonia emissions, water quality and quantity.

Address ammonia emissions and their impacts through the forthcoming Ammonia Strategy

As referenced within the consultation ammonia emissions have increased substantially in Northern Ireland in a relatively short period of time, causing significant impacts to a range of protected sites, ultimately undermining their value for nature and biodiversity. Similarly, high concentrations of ammonia in the atmosphere have a negative impact on public health and incur significant costs. This issue has been a persistent issue in Northern Ireland for a considerable time period, and yet detail on a specific ammonia strategy for Northern Ireland has not been forthcoming. This must be set out at the earliest priority in order to achieve our legal targets in relation to air quality through a reduction in ammonia concentrations whilst reducing impacts on nature, public health and the environment. With 96% of emissions arising from agriculture, there is a critical role for the agriculture sector to play in reducing ammonia concentrations to within legal limits. This action can only be considered acceptable if the ammonia strategy instigates the required level of action to achieve this aim.

Evidence suggests that solely relying on voluntary measures will be insufficient to reduce ammonia emissions at the necessary speed and scale. Therefore, there is a need for more stringent approaches to be outlined within the ammonia Strategy to ensure sufficient behavioural change from the sector to reduce ammonia emissions from agriculture.

An ammonia strategy should take steps to ensure that relevant farmers invest in suitable farm infrastructure and equipment to reduce emissions. There is a case for establishing some financial help where this is required, for example in relation to costly investments such as slurry stores on farms where there is a strong probability of continuing in the same line of production. These should take the form of soft loans to ensure equity with those farmers who have already invested at their own cost to deliver improvements within their business and to ensure value for money. Any such investment should be time limited after which farmers will be expected to make improvements at their own cost. There is also a role for independent advice in helping farmers make changes that will reduce emissions.

The farming for nature package recently outlined by DAERA could help to protect and restore habitats impacted by ammonia, but these must be supported by a strong regulatory baseline. The use of public funds should be prioritised to fund the restoration and management of those impacted habitats and not to reward farm businesses and other land managers for simply complying with (current or future) regulations and not polluting the environment.

1.1 Clean air strategy

Although the Clean Air Strategy commits to SMART targets, these must be underpinned by legally binding air quality targets. Existing actions to manage and improve air quality has been largely driven by EU derived regulation. Many of NI's existing air pollution targets are set to expire in 2030 and as such there is a clear need for these to be replaced. However, there is significant room for improvement as in many cases they are too weak to protect human health and the environment. The Clean Air Strategy should be underpinned by more ambitious targets, both in the long term and to cover interim periods.

The Clean Air strategy and any additional legislation and policy frameworks will only be effective with oversight of government, businesses and individuals. Such oversight must be independent, well-resourced and have sufficient capacity for enforcement. the NI Executive and Assembly must support the full implementation of the Office for Environmental Protection (OEP) and establish an Independent Environmental Protection Agency owing to their distinct but complementary roles and remits.

1.2 Water Resources: Quality and Quantity

The current targets and actions outlined within the Strategy represent backsliding on existing legislative requirements. The fact that no rivers, lakes, or transitional and coastal water bodies are in good condition signals the scale of the challenge in improving the state of water quality in Northern Ireland, which the actions outlined will do little to address. Furthermore, there is already an existing statutory target to achieve 100% Good Environmental Status of freshwater systems by 2027. The fact that the strategy aims to ensure that 70% of waterbodies by 2030 represents a rowing back in ambition and at a later date.

As noted above a new and improved regulatory baseline for agriculture, which drives higher rates of compliance and helps secure widespread behavioural change, will be crucially important in reducing agriculture's impact on water quality. This regime must be invested in as a priority, to help farmers better understand how regulation applies to their business practices and the steps they must take to remain compliant/remedy issues of non-compliance. That said, where enforcement action is necessary, statutory agencies must be well resourced to undertake this function. On top of this, actions which go beyond this baseline e.g. riparian buffers, peatland restoration etc. will also be

important. These should be delivered at a catchment scale to maximise the benefits that can be accrued through changes in land management.

Finally, several of the actions outlined within the RBMP programme of measures should be significantly improved to ensure that they are SMART in nature. For example, by clearly outlining a % reduction in the use of chemical fertilisers by given point in time, clear measurable pesticide reductions etc. For example, the European Commission's recently published Farm to Fork Strategy¹ provides an example of such targets which could be applied in an NI context to improve the sustainability of farming and reduce its impact on water quality and the wider environment.

Strategic environmental outcome 2. Healthy and accessible environment and landscapes everyone can connect with and enjoy

Yes, subject to comments below, including improvement of targets actions and outcomes

Connecting people to the environment: Landscapes, Seascapes and Natural Beauty

There will be a role for future farm support schemes to help provide better public access to the countryside, for those farms that are willing and able to do so. Access should therefore be included as one of the outcomes within a future agriculture policy framework. This can help contribute to wider societal objectives, such as improved health and wellbeing and should be encouraged.

The Next Generation

The next generation of farmers will have a crucial role to play in ensuring that agriculture can play its full part in addressing the nature and climate emergency. Therefore, there is a clear and urgent need for teaching on sustainable nature friendly farming practices to be mainstreamed within agricultural education in Northern Ireland. To date, agricultural education providers have largely focused on an intensive mode of farming which has served to undermine the natural resource base on which all farming depends. Whilst some positive moves have been made to incorporate sustainability into conventional teaching, it does not go far enough to pave a way towards nature friendly farming at scale. CAFRE and other providers should work together to create courses focused on teaching agroecological farming practices to the next generation of farmers in Northern Ireland.

Strategic outcome 3. Thriving, resilient & connected nature and wildlife

Yes, subject to comments below, including improvement of targets actions and outcomes

Protecting nature on land

Northern Ireland's protected sites network is crucial in halting and reversing the significant declines in nature witnessed to date. However, our protected sites, which should represent the jewel in the crown of nature's protection and restoration are failing to deliver for the species and habitats for which they have been designated, with downward trends in site condition being witnessed in recent years. whilst the commitment to extending the protected areas network to create bigger and better areas for nature is welcome, the targets proposed within this section do not account for the poor state of the protected sites network, or underinvestment in driving improvements in the condition

¹ https://ec.europa.eu/food/system/files/2020-05/f2f_action-plan_2020_strategy-info_en.pdf

of these important sites. To deliver a more resilient future for Northern Ireland's protected sites network, we call for the following SMART targets to be incorporated into this section.

30% of land protected for nature by 2030:

At present, the target to protect 30% of land in Northern Ireland by 2030 is weaker than what is being currently proposed within the Convention on Biological Diversity. Therefore there is considerable improvement needed to raise the level of ambition within the NI Strategy. This target should be improved by

- 1) Ensuring that at least 30% is protected, as opposed to this figure representing the maximum
- 2) Recognising that different designations provide different levels of protections: biodiversity protection should take precedence
- 3) Recognising the socio-economic benefits of protected areas; such as job creation and non-monetary services derived through improvements in natural capital
- 4) Committing to effective long-term management of the protected sites network to drive improvements in quality
- 5) Integrated into wider ecological networks, to ensure that protected areas and other area conservation measures are coordinated with improving the natural environment throughout Northern Ireland i.e. the other 70%

Restore 75% of 150,000 hectares of protected sites to favourable condition:

The previous draft strategy set a target that 95% of all protected sites to be in or approaching favourable condition. The above target therefore represents a significant rowing back on ambition compared to what was previously outlined, which is disappointing. Furthermore, there is a clear need for this target to be improved, by setting a clear time frame for delivery, with associated interim targets, alongside sufficient investment to improve condition. such targets should represent the minimum of what is required, with language reflecting this e.g. "at least".

Create or restore 75,000ha of wildlife rich habitat outside the protected site network (focusing on priority habitats and supported by nature-friendly land management):

The recognition that restoring nature outside of the protected sites network is welcome. Again this should represent the minimum of what we aim to achieve, which should be reflected in the language with use of the term at least. Furthermore, this should be clearly linked to and developed coherently with other habitat targets outlined within the strategy, such as woodland creation and peatland restoration. The protected sites network should provide the foundation of wider ecological restoration across Northern Ireland. halting and reversing declines in biodiversity by 2030 will require the NI Executive to look beyond the protected 30% of land and explore how land management throughout Northern Ireland can help create bigger, better and joined up spaces for nature, which is currently missing from the Strategy.

Private Funding Mechanisms and Green Finance: To date, private investment in nature has had a minimal role in financing nature conservation in Northern Ireland, as well as providing a useful income stream for farmers to adopt nature friendly land management practices. However, private sector finance has the potential to play an important role in helping close the current nature funding gap. New income streams can be generated through new market-based approaches but getting these market models right and ensuring consistency and coherence will be paramount. Government needs to take a strong and active role in creating the conditions and enabling framework to facilitate private investment and addressing the barriers which currently restrict opportunities for private finance in nature.

Create demonstratable benefit for peatland habitats: We welcome the inclusion of an action to publish a peatland strategy and implementation plan by 2022 and the target to ensure all semi-natural peatlands are conserved or restored to healthy functioning ecosystems by 2040. 2040 is a reasonable timeframe given it will take years for the habitats to be in good condition following restoration. To have any chance of realising the 2040 outcome, restoration activities and appropriate land use change, management and restoration will need to be progressed with much greater urgency. Interim milestones must also be included for 2025, 2030 and 2035 to provide a clear progress pathway to 2040.

Strategic outcome 4 'Sustainable production & consumption on land and at sea'

No

We welcome the recognition of nature friendly farming's role in improving the natural environment and the need for schemes to help farmers deliver environmental outcomes at scale. However, what has been proposed does not give us confidence that the Environment Strategy will be a key delivery mechanism. Currently, there is only one action outlined within the strategy, which is to deliver another a consultation on a future agriculture policy framework. This is problematic for the several reasons, not least because the consultation of future agriculture policy is lacking in detail on future schemes to support nature and the environment, particularly in areas around scheme design and funding. Furthermore, there are significant risks that many of the proposals outlined within the agriculture policy framework are in conflict with, as opposed to being complementary of the Environment Strategy. To ensure that farming is able to rise to the challenge of the nature and climate crises, we recommend the following;

A Northern Ireland Agriculture Act

Agriculture and land use will play a key role in delivering the aims of the Environment Strategy and a range of other public policy objectives in relation to the environment. To date, agriculture policy has largely contributed to many of the environmental issues we are currently facing, representing the largest emitter of Greenhouse Gases and the most significant driver towards biodiversity loss and poor water quality. There is an opportunity to transition Northern Ireland's food and farming system so that it can make a significant contribution towards addressing the nature and climate emergency and we welcome the Environment Strategy's commitment to supporting nature friendly farming, which will be a key delivery vehicle. However, this needs to be clearly backed by robust domestic legislation and funding which ensures that land management is genuinely sustainable.

Primary legislation will be essential in delivering the change needed to restore nature, reduce emissions, increase carbon storage and sequestration as well as helping farmers to transition to more profitable business models. A Bill should outline a clear purpose for future agriculture funding, principally rewarding activities that serve to restore and enhance nature and the environment, which are not currently rewarded by the market. It must set out a clear transition from current policies to the next, providing certainty and clarity to farmers, allowing sufficient time to plan and adapt. A Bill must be a priority for the next Assembly mandate and be in place by 2024.

Investment in Nature friendly farming

Every farm can do something great things for nature, but often they need the support to do it. A new sustainable farming scheme should act as the key delivery vehicle for future farm support and should be funded to the scale of environmental need². It should incentivise activities that deliver demonstrable benefit to nature and the environment and go above what is expected as part of good practice. Schemes should be open to all farmers and coupled with dedicated farm business advice to deliver the highest quality environmental outcomes. Other support schemes and advice should also be put in place, to help improve profitability, productivity and for farmers to invest in the necessary changes to deliver a more sustainable future. A dedicated farm transition fund should be established, which provides farmers with the support required to adapt, alongside this a new entrants fund should be established to encourage new farmers to the sector.

Future scheme design

A future payment scheme focused on delivering positive environmental land management should represent the principal means of farm support. In the future, payments for environmental delivery can help provide a stable reliable income source for farm businesses, whilst delivering multiple goods and services to society. This represents good value for money to the taxpayer and provides a robust justification for long term public investment in farming and land management. To ensure the effective delivery of environmental outcomes and achieve farmer engagement and buy in, policy should be practical and simple. Policy should be holistic, based on the whole farm operation including production and environmental aspects as far as this is possible.

Comprehensive entry level scheme

A comprehensive, broadly accessible element - available to all land managers that meet the entry threshold. The scheme should pay for good environmental land management with requirements above and beyond baseline regulatory requirements. This should address widespread issues such as protecting soil, air and water resources, reducing greenhouse gas emissions, and maintaining wildlife habitats and landscapes. The comprehensive element would include simple interventions such as hedgerow restoration and management, tree planting, creating wildflower field margins, establishing bird cover crops, creating wetland features, establishing stream-side corridors, low input winter and spring cereals and retaining winter stubbles on arable land. These are measures that could be implemented by the majority, if not all, farmers and land managers. The aim should be to encourage a step change towards more sustainable production - with more farmers enrolled in a more ambitious scheme than currently. This element of the policy would effectively replace direct payments as the primary public funding mechanism available to farmers and land managers to engage with. To achieve this there will need to be significant financial investment in support to move the large majority, if not all, farmers into the scheme. This will include advice and possibly transition payments to support farmers to both gain recognition for work they are already doing and to reach an ambitious level for this scheme

Targeted scheme design

Targeted payments should aim to conserve priority species and habitats, to ensure the appropriate management and condition of designated nature conservation sites and to support habitat recreation and restoration e.g. peatlands and wetlands. A targeted element will address specific problems that need more investment and more complex management, often over a landscape scale, including management, restoration and creation of priority habitats; species recovery programmes,

² Research estimates that the total funding allocated towards environmental land management in NI equates to roughly £188 million per annum an eight-fold uplift on current investment

including predator control; ensuring high water quality; and supporting strategic natural flood risk management. This payment should be determined by both national and local priorities and should be flexible enough to tailor to a farm or landscape context with the ability to combine measures to maximise potential benefits.

A joined-up approach

Future schemes should aim to work at a landscape scale and payments should be calculated to account better for this collaborative, coordinated approach. This helps connect the good work of farmers in each area, to contribute more effectively towards environmental outcomes, rather than creating fragmented areas of good quality habitat within biodiversity deserts. There should be a fund for landscape scale collaboration. Farmers that want to collaborate to produce landscape scale results, for example species recovery or to improve water quality, should have access to additional support to help them do this, for example groups working at a catchment scale. Promoting habitat connectivity of our countryside is essential. All farms should be encouraged to partake in the scheme so that there is better connectivity across the countryside. Hedges, grasslands, tree lines and wild areas should continue to play a role as they work better when coordinated over a wider landscape scale.

Regulation

Any future support scheme needs to be underpinned by an effective regulatory baseline. This should ensure that all farmers are operating on a level playing field and meeting minimum regulatory requirements. The baseline should apply to all farm businesses, not just those that are engaged within a future support system. This is necessary to make farms more environmentally and nature friendly and ensures that the environmental benefits that farmers deliver through schemes are not undermined by damaging practices elsewhere. Regulation creates a level playing field, with all farmers and land managers bound by the same rules. Regulation should define the rights and responsibilities of landowners, providing clarity about when they will be expected to maintain existing environmental and animal welfare standards and when they can access support for provide additional benefits, for example for going beyond regulatory standards to help improve water quality.

Strategic use of land

Achieving the objectives of the Environment Strategy, ambitious action on climate change and nature's recovery will require a fundamental shift in how we farm and manage our land. The CCC's 6th carbon budget identifies large scale woodland expansion, peatland restoration and an increase in the coverage of energy crops throughout the UK. In delivering climate objectives from our land, it is important that interventions simultaneously deliver other beneficial outcomes and as a minimum do not negatively impact upon the delivery of these objectives. The development of a Land Use Strategy would provide a more holistic understanding of land/land use and help deliver a more strategic approach to future land use decision making. This would help secure the best use of our land in delivering climate objectives, whilst providing a range of other goods and services for society. A Land Use Strategy would provide a framework to manage conflicting policy priorities, understanding potential land use trade-offs and balancing competing demands on land. Including this provision within the Act would enable more joined-up and effective decision making and ensure high-quality outcomes from land management. The CCC have endorsed the need for a strategic land policy in Northern Ireland (Reducing Emissions in NI, February 2019). Previous proposals for Land

Use Strategy for Northern Ireland which received cross-party and Ministerial support in 2015 would be a useful starting point for progressing a Northern Ireland Land Use Strategy.

Supply Chain

There is an important role for consumers and the food supply chain in influencing how land is managed. Accreditation schemes can ensure that food produced to high environmental standards is recognised in the market and that farmers producing in this manner receive generous reward. Government can play a key role in facilitating this and should work with stakeholders to determine what opportunities exist. For example, food produced on land managed under environmental schemes could be marketed based on its role in delivering environmental benefits. Improved public awareness of environmental schemes would allow the public to understand better the link between the taxes they pay, their spending on food and the management of the countryside. Where possible, future agriculture policy should also encourage farmer cooperation to create and develop local sustainable supply chains, which often allow farmers to secure added value for what they produce. Digital solutions like Equilibrium Markets and Source Grow could help to transform public and private procurement of local food direct from farms. Models like Big Barn's food hubs and Neighbourfood could support the development of local markets. Support for 'direct to consumer' routes like honesty boxes, vending machines and veg box schemes will help to shorten the supply chain. Stimulating these markets will support farmers transitioning to more profitable and sustainable crops. Similarly, there are opportunities to create geographic indicators for products emanating from particular landscapes. Opportunities for this have been largely provided through previous RDP schemes and should be encouraged in the future.

Another important role that the public sector can play in creating sustainable supply chains and encouraging healthy sustainable consumption, is by ensuring that public expenditure contributes towards the objectives of the strategy. There is a major opportunity to use public procurement to support sustainable farming and land use, for example by transforming catering across the public estate to focus on providing healthy, sustainable nature friendly food. Such moves would help create an increased market for food and other products that have been produced through genuinely sustainable practices. Better procurement policies will also improve transparency in supply chains by requiring a better understanding of where products come from and how it is produced. This can help shorten supply chains, providing a better return for producers who currently often receive too little value for their produce. For example, a growing demand for more fruit and vegetables and alternative protein sources will create new opportunities.

On farm nature-based solutions

Climate Change and on farm Nature Based solutions the farming sector has a moral obligation to switch to nature friendly farming. We can and must become part of the solution, slowing, halting and then reversing the climate and nature emergencies. The Northern Ireland agriculture sector has a vital role to play in delivering an ambitious target. Ambitious domestic targets are essential, not only in ensuring that emissions are reduced within a specified timeframe, but also in providing the right signals to the sector to invest in farming practises that enable the transition to nature friendly farming at scale. We believe that in facilitating an alternative approach to farm business management, that actively works with nature we can restore our land's capacity to store and sequester more carbon, whilst significantly reducing emissions from agriculture; and that with the right policies, support and investment, NI's agriculture and land use sector can achieve ambitious GHG reduction targets. Climate action should not be viewed as a constraint, but an opportunity to facilitate a new era for farming and land use, which provides a vibrant farming sector, thriving wildlife, whilst ensuring that Northern Ireland achieves world leading climate ambitions. In achieving

an ambitious target, it is essential that the sector is fully equipped and supported to make the necessary transition. Whilst some nature and carbon friendly farming changes will be simple, many will require support including funding, advice and a change in many overarching policy frameworks.

Measuring Success

Monitoring and evaluation will be key to assessing the positive impact of adopting nature friendly farming practices, in assessing the value for money of such interventions and in helping farmers to measure and assess their progress at the individual farm scale. Monitoring and evaluation should be built into schemes from the outset to determine effectiveness over time. Furthermore, farmers should be supported to monitor the impact of changes they adopt on their land and to understand what baseline they are operating from. Our work undertaking biodiversity and carbon audits with farmers across Northern Ireland highlights a model which could be adopted at a larger scale.

Trade

Whilst not included within the Strategy, efforts to support more sustainable production and consumption in Northern Ireland should not be undone by trade policies which offshore our environmental footprint abroad. Therefore, there is a need to ensure coherence between the aims of the environment strategy and other policies across the Executive. Linked to our comments on the supply chain is the need for clear labelling such as outlined within CLEAR to ensure that for all food types, both domestically produced and imported, production methods are clearly accounted for. a robust and transparent labelling regime would help encourage the adoption of nature-friendly practices through consumer-led initiatives and build trust between the sector and the public.

5 Zero waste & highly developed circular economy

Yes, subject to comments below, including improvement of targets actions and outcomes

We are disappointed that the opportunity to adopt circular economy principles within the agriculture sector has been missed within the Strategy. Whilst actions have been set to reduce food waste there has been nothing outlined to foster a better use of resources between sectors. there are opportunities for farmers to work collaboratively to make best use of resources e.g. Arable farmers using organic materials livestock sectors to build soil fertility, but this has been missed.

6: 'Fair Contribution to UK net zero greenhouse gas emissions & improved climate resilience and adaptability

No

The development of a Northern Ireland Climate Act provides a major opportunity to help the agriculture sector transition to climate and nature friendly farming practises, at the same time as providing benefits to farm business resilience and profitability. The farming sector has a moral obligation to switch to nature friendly farming. We can and must become part of the solution, slowing, halting and then reversing the climate and nature emergencies.

We believe that the Northern Ireland Assembly and Executive must go further than the commitment outlined within the Environment Strategy. Northern Ireland's greenhouse gas reductions targets should be based on adhering to the recommendations of the Intergovernmental Panel on Climate Change (IPPC) and adhering to the Paris Climate Change Accord which requires signatories to reduce total greenhouse gas emissions by at least 30% by 2030. Under the net zero balanced pathway, Northern Ireland is not on track to meet this target. Similarly, to meet the target of net zero UK

agriculture by 2040 it is likely that Northern Ireland will have to go beyond the reductions outlined by the Climate Change Committee.

Within the 6th Carbon budget, the CCC's analysis indicates Northern Ireland would not be able to reach Net Zero before 2050 largely because of the modelled impact on Northern Ireland's agricultural sector as a result of a significant reduction in output. However, we believe that this analysis does not take into account the business benefits that can be achieved through supporting and adopting a different approach to farm business management, in which the emphasis shifts from output to profit margin. Recent studies have shown that farm businesses need to review production costs, outputs, and the role of farm support schemes, but also consider that their ultimate profitability could actually be inextricably linked to their partnership with nature. The research has shown that farmers continuously working with high-input high-output systems often experience less profit or are unable to break even financially. Nature provides farmers with 'natural capital' for their businesses in the form of soils, grass, water and geology, which farm businesses work with for crop or livestock production to take place. Where these 'free issue' assets are not managed correctly, farm productivity will reduce. Taken beyond their natural production limit, for example by increasing stocking levels to more than the grass can cope with or cropping more than the soil can naturally support, the farming businesses will need to adapt to maintain production. This is achieved via additional inputs such as fertilisers or the requirement to purchase additional feed to maintain productivity. This increases the overall costs of production and potentially reduces the profitability of the farm business.

We believe that in facilitating an alternative approach to farm business management, that actively works with nature we can restore our land's capacity to store and sequester more carbon, whilst significantly reducing emissions from agriculture; and that with the right policies, support and investment, Northern Ireland's agriculture and land use sector can achieve more ambitious reduction targets than currently presented. Climate action should not be viewed as a constraint, but an opportunity to facilitate a new era for farming and land use, which provides a vibrant farming sector, thriving wildlife, whilst ensuring that Northern Ireland achieves world leading climate ambitions.

NI climate change legislation should include the following.

- A clear, ambitious, and binding net zero by 2045 target
- Clear, ambitious, and binding Interim targets
- A duty on government to bring forward a Climate Action Plan with sectoral targets and relevant policies/programmes and clear carbon budgets for each sector (to be laid before the NI Assembly within two years)
- A duty on government to establish an oversight mechanism to scrutinise progress, in the form of a Climate Office and NI Climate Commissioner to hold decision makers to account for delivering climate commitments.
- A Just Transition Commission should be established to support the production and monitoring of climate action plans, providing expert advice on their development.

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

No

Do you have any other comments or contributions?

Legal targets for nature's recovery

Non-binding targets have failed to deliver sufficient action across the Executive and from public authorities to adequately protect the environment, let alone drive its restoration. Adopting the same approach is likely to result in another Strategy which fails to meet the targets it has set for itself. Legally binding targets are urgently needed for critical aspects of the environment such as in areas where comprehensive legally binding targets do not currently exist such as for biodiversity, and in areas where existing targets are either not strong enough or are due to expire such as air quality. This target framework must be developed with independent expert advice, and duties embedded across the Executive and wider public authorities.

Dedicated resourcing of the Environment Strategy

The Executive must commit and provide adequate long-term resourcing to an Environment Strategy group within DAERA comprised of experts in all relevant areas and cross-Executive representation, that is motivated to drive ambition and action. This resource commitment is necessary to aid the development, implementation, monitoring, and necessary revision so as to ensure that an Environment Strategy leads to the significant improvement in the natural environment. This group must also be empowered to carry out robust and ongoing stakeholder engagement to ensure that expertise in external partners is embedded within the Strategy, and proposals and drafting are tested.

Provision of good governance

The Strategy must set out commitments to good governance, including adequate resourcing of and respect for the independence of the OEP and establishment of an independent EPA.