



The Northern Ireland Marine Taskforce (NIMTF) is a coalition of non-government environmental organisations – it includes RSPB, Ulster Wildlife, Wildfowl and Wetlands Trust, National Trust, Friends of the Earth, Marine Conservation Society, Keep Northern Ireland Beautiful, Irish Whale and Dolphin Group, Surfers Against Sewage, Shark Trust and Northern Ireland Environment Link.

The NIMTF has the support of approximately 100,000 local people. We are working towards healthy, productive and resilient seas for Northern Ireland.

**Northern Ireland Marine Task Force response to: [NI Executive - Programme for Government 2024](#)
Submitted: 1st November 2024**

NIMTF welcomes the opportunity to provide feedback on the NI Executive's Programme for Government (PfG) 2024. Since the return of the Executive, we are pleased to see several strategies that will provide a policy framework for marine conservation in NI being consulted on, including NI's MPA Strategy review. NIMTF welcomes continued work with the NI Executive and the opportunity to feed into the final Programme for Government for the remaining term of the NI Executive.

To further opportunities within the marine environment, this PfG must:

Action: Prioritise statutory obligations to the marine environment by contributing progress to meeting crucial objectives of the Kunming-Montreal Global Biodiversity Framework (GBF)¹ by 2030 and the UK Marine Strategy².

Action: Prioritise long-term, cross-departmental funding from identifiable budgetary allocations to ensure specific key marine environmental protection, and to implement management strategies and monitoring programmes to support recovery of the marine environment through relevant policies.

Action: Cross-departmental collaboration and implementation for the marine environment to achieve holistic objectives through the use of joint resources across relevant departments.

Action: All activities within the marine environment must follow an ecosystem-based approach leading to marine habitat and species recovery.

PRIORITIES

Given the focused remit of NIMTF, we will only be responding to questions relating to the following priorities:

- Protecting Lough Neagh and the Environment
- Grow a Globally Competitive and Sustainable Economy

We will also offer comments on environmental aspects of the following:

- Cut Health Waiting Times

- Better Support for Children and Young People with Special Educational Needs

A summary of NIMTF's responses to the online questionnaire within this PfG can be found within Table 1 in Annex 1 at the end of this response.

Question 28. How much do you agree that the priority 'Protecting Lough Neagh and the Environment' should be included in the Programme for Government?

Agree partially

Question 29. The draft Programme for Government has set out actions that we plan to take under the priority 'Protecting Lough Neagh and the Environment'. How much do you agree that these are the right actions to take?

Agree

Question 30. Please provide any other comments you have in relation to the 'Protecting Lough Neagh and the Environment' priority:

Action: The NI Executive must prioritise implementing actions from finalised versions of the Blue Carbon Action Plan, MPA Strategy (Review), Seabird and Elasmobranch Conservation Strategies and the NI Marine Plan.

Action: The NI Executive must prioritise the recovery of wider aquatic systems, not just Lough Neagh.

Whilst it is positive to see this PfG outline actions to protect aspects of terrestrial and freshwater environments, it is vital equal attention is given to protecting and restoring NI's marine environment. NIMTF are concerned that a distinction is being made between Lough Neagh and the environment, when this PfG should be considering the environment as a whole. Over half of NI's biodiversity is found within the marine environment. We therefore cannot truly safeguard nature without safeguarding our seas.

On a UK level, only 4 out of 15 indicators³ for achieving Good Environmental Status under the UK Marine Strategy have been met and evidence that shows over the last 50 years there have been declines in marine species and habitat abundance with cumulative effects, including climate change, that have put a strain on our marine environment; for example, research showing at least 44% of the UK's seagrasses have been lost since 1936⁴.

Furthermore, Northern Ireland is falling behind the other devolved nations in our statutory duties. Joint research by the Natural History Museum and RSPB shows that NI ranks 12th worst out of 240 regions for biodiversity loss globally⁵; we are witnessing drastic decreases in marine species and habitats. For example, the latest JNCC seabird census shows declines of over 70% in NI seabirds such as the Atlantic Puffin & Roseate Tern and the lack of an independent environmental protection agency (EPA) compared to the rest of the UK.

On Page 46 of this PfG, NIMTF are pleased to see mention of "Our First Environment Strategy", referencing NI's first Environmental Improvement Plan (EIP) which will "include a range of

commitments to improve our natural environment” and address “global challenges of biodiversity loss and climate change.” With this Programme for Government, there is a strong opportunity to turn this tide and implement actions that will protect and restore our marine environment. Below we’ve outlined the key aims of NIMTF Marine Vision. These aspects must be prioritised by this executive to achieve ocean recovery.

It is important to state that the ongoing crisis of water pollution at Lough Neagh is of particular concern to NI’s wider aquatic systems and should be a priority for this PfG. Lough Neagh highlights the scale of impacts that have resulted from years of a lack of regulation and management in our environment. This crisis not only impacts NI’s terrestrial and freshwater ecosystems, but the wider NI marine environment. As it stands, coastal water condition is in a flux and further work is needed to improve this metric, given that 40% of the inner lough is protected for the shellfish industry is also failing to meet targets designed to provide special protection of waters for the shellfish industry⁶. 80% of the 270 storm overflows discharging into Belfast Lough have been found to be ‘unsatisfactory’⁷, leading to a hindrance in achieving Good Environmental Status (GES) within this lough. Lough Neagh’s blue-green algae situation affected further afield where spillover effects were reported on the North Antrim coastline^{8,9} last summer, resulting in beach closures, which does not bode well for our adjacent marine environment or coastal users., with the cell counts of a toxin, microcystin (bacteria produced by blue-green algae) exceeded recommended guidelines set by the World Health Organisation (WHO) on 5 occasions across 2 different sites¹⁰ in the sample results of 2023 on the Northern coastline. NIMTF would welcome the opportunity to engage with the NI Executive further on different ways to achieve this, as well as highlighting our current, frequent engagements with DAERA on this topic.

Recovering Biodiversity

Northern Ireland is home to an abundance of iconic and often vulnerable marine wildlife such as harbour porpoise, puffins, horse mussel reefs, seagrass beds. These species and habitats will benefit from an ecologically coherent network of Marine Protected Areas (MPAs) in Northern Ireland which is well managed, monitored, enforced and resourced. Currently NI’s MPA network is not working as effectively as it can for nature. A lack of MPA Management Plans in place for the NI Network has made it challenging for targeted actions that will recover designated species & habitats to be undertaken, reinforced by delays in legislation due to capacity within relevant Departments. It is now vital that current gaps in the MPA network are filled with new designations and effective management is in place. Only then can we work towards Good Environmental Status being achieved for NI seas. Further information is highlighted in our MPA Strategy Review¹¹ response with a few key priorities highlighted below:

- DAERA to publish the proportion of the MPA Network that is under active management to provide a better understanding of where management and enforcement efforts should be focussed.
- DAERA to implement a monitoring programme to assess the effectiveness of MPAs based on recovery and ‘spillover effect’ to further promote collaboration with the fishing industry.
- DAERA to work with DEFRA to manage offshore MPAs as they move to devolved responsibility.

Sustainable Fisheries & Development at Sea

The NI fishing Industry is an important aspect of Northern Ireland culture and economy. To ensure its success and to protect commercial fish populations as well as the wider environment, it must truly be sustainable and at the forefront of decision making. An ecosystem-based approach to fisheries management must be applied. Doing so will ensure that healthy ecosystem level components and processes are recognised as vital for good fish stock management, as well as reducing impact to sensitive marine areas and are used to inform decision making. To aid this process, all fishing activity must be fully documented, monitored and integrated with other marine planning and conservation measures at sea - ensuring harmony with our marine environment.

Strategic, fit for purpose marine planning and licensing to marine developments must also be applied which puts the environment at the forefront of decision making and will be key for achieving marine recovery alongside tackling the climate crisis. It should give activities and policies which prevent the achievement of healthy seas a lower priority, and similar to fisheries, apply an ecosystem based rather than a sectoral based approach.

Additionally, NIMTF is pleased to see reference in the PfG to “provide a commitment to supporting the cost of this transition in a fair and balanced way.” It will be vitally important that DAERA lead in developing policy and delivery of a Just Transition for the fishing industry.

Climate Action

NIMTF welcomes the mention of Climate Action Plans and associated carbon budgets within the PfG, in particular “detailing cross-cutting steps to reduce carbon emissions, adapt to changing weather patterns and work towards net zero.” However, it is disappointing that the NI Executive are already out of step with the Climate Change Act (Northern Ireland) 2022 which requires Climate Action Plans to be developed by June 2024. NIMTF will be judging the validity of Climate Action Plans and carbon budgets on their role in addressing both the climate and nature crisis.

A healthy marine environment also has a key part to play in climate change mitigation. Known as the planet's "carbon sink", the marine environment absorbs 25 percent of all carbon dioxide emissions and captures 90% of the excess heat generated by these emissions¹². It can only do this in a productive state, reiterating the need for this PfG to deliver actions that will result in a healthy, thriving marine environment.

NIMTF contributed to the development of NI's first ever Blue Carbon Action Plan (BCAP)¹³, providing the following recommendations to ensure the Action Plan is robust and efficient to deliver on nature-based solutions:

- Develop a baseline inventory of all blue carbon habitats in Northern Ireland: their extent, with local measurement of carbon sequestration rates (CSRs) and estimated total carbon storage by habitat, including understanding how the condition of habitat affects CSR.
- Ground-truth current estimated extent and habitat suitability areas in this blue carbon report referring to Action 1.4 and identify habitat condition and any notable local pressures at each site.

Governance

Within the PfG there is no acknowledgement of the development of an Independent Environment Protection Agency (IEPA). Through the establishment of an IEPA, alongside the Office for

Environmental Protection (OEP) we can ensure that our natural systems are being effectively managed, with impactful repercussions in place to address degradation of our marine environment.

Question 7. How much do you agree that the priority 'Grow a Globally Competitive and Sustainable Economy' should be included in the Programme for Government?

Agree

Question 8. The draft Programme for Government has set out actions that we plan to take under the priority 'Grow a Globally Competitive and Sustainable Economy'. How much do you agree that these are the right actions to take?

Agree partially.

Question 9. Please provide any other comments you have in relation to the 'Grow a Globally Competitive and Sustainable Economy' priority:

Action: This PfG must include and effectively manage the marine environment's ability to provide ecosystem services, coastal resilience, sustainable fisheries and eco-tourism as part of a sustainable economy to support society.

Action: Marine developments, including offshore renewable energy developments and those within the fishing industry where interactions that take place in the marine environment must be environmentally sustainable.

Action: Drive forward practical actions to deliver an effective MPA Network, Blue Carbon Action Plan, Seabird and Elasmobranch Conservation Strategies under statutory obligations.

There is a notable mention of growth throughout PfG, alongside protecting the planet and sustainability. It is important that the contradiction and challenges between these two themes is acknowledged. Nature is in crisis, and it is paramount that greater attention is given to the recovery of key local marine species and habitats prior to actions for further expansion and industry growth. NIMTF welcomes the inclusion of sustainability in the title of this priority, but the executive must ensure that we are not putting economy at all costs before the environment, as a healthy environment is essential for a thriving society and economy.

Ecosystem Services offered by the Marine Environment.

Restoring the health of the marine environment will not only benefit species and habitats but will have a positive impact on societies across NI. The ocean provides the oxygen we breathe and is an important part of the water cycle and climate system while also supporting fishing, aquaculture, tourism and other marine industries that make up the 'blue economy'. Therefore, revitalising the marine environment is a necessary step to achieve priorities in this PfG such as prosperity, health & well-being and job creation, providing cost effective solutions to many of the problems our society faces.

With the pressing issue of climate change, society will experience intense changes in temperature, storm surges and rising sea levels in the coming decades, which we must prepare for through adaptation and mitigation. A healthy, thriving marine environment is a key tool in supporting climate mitigation. For example, the presence of coastal habitats - e.g. coastal dunes, saltmarshes, seagrass, kelp, maerl and oyster reefs reduce wave energy and therefore the impact of incoming storm surges. By implementing these nature based solutions on our coastline, we can create cost-effective alternatives to the worst impacts of climate change. Further information is found below in the 'Planet' Mission section. As discussed above, our blue carbon marine habitats also provide key carbon sequestration opportunities, further highlighting how our seas can support the fight against climate change.

Various member organisations of NIMTF are highlighting the benefits of "ecosystem services" which can lead to greater quality of life for those living across Northern Ireland: Ulster Wildlife's Native Oyster Restoration Programme based at Bangor¹⁴, Glenarm¹⁵ and Belfast Harbour¹⁶; RSPB's LIFE Raft project¹⁷ which focuses on pest eradication, but the establishment of Rathlin as a protected area for seabirds has been crucial for community involvement and empowerment; KNIB's 'Blue Flag Award'¹⁸ having capacity to be linked to Good Environmental Status - which collectively includes water quality; but we must ensure that the natural environments which provide these ecosystem services are managed effectively and allowed to thrive and recover.

Renewable energy

On Page 18, *decarbonisation* is highlighted as being crucial to ensure "Self-sufficiency in our own clean and affordable energy" and that "Wind, biomethane, and geothermal (will be explored) to break the link with global energy prices." NIMTF understands and welcomes the inclusion of NI-level energy production, but the process by which we deliver this must ensure that we do not hinder the recovery of biodiversity which is already witnessing drastic declines. This includes the marine environment, for which NIMTF will continue to advocate for developments at sea that embed nature within planning to achieve species and habitat recovery. It will be important that there is a line reflected within the Energy Strategy for Northern Ireland which makes the policy links to the upcoming Offshore Renewable Energy Action Plan (OREAP) to ensure that future NI energy production is not only clean, but is in harmony with nature.

Further renewables development should be strategically and spatially planned so that the areas most sensitive for nature are avoided. Strategic spatial planning does not negate the need to comply with the mitigation hierarchy in all developments whereby impacts to nature are avoided in the first instance, minimised where they cannot be avoided and mitigation is only pursued as a last resort. All renewable energy developments must be underpinned by robust and competent environmental assessment. Furthermore, policy support should only be directed towards genuinely sustainable renewable energy technologies that will be in harmony with nature. Therefore, the precautionary principle will need to be applied where technologies are new or novel and the impacts are not yet fully known.

In order to meet a "Low carbon, Just Transition, Renewable Energy Economy", we must ensure a Just Transition that supports renewable energy developments that consider both the climate and biodiversity crises together. To deliver a sustainable energy transition in harmony with nature, climate and nature must be at the heart of our economic Green Recovery and energy transition to build a just, sustainable and resilient future. Increased energy infrastructure and efficiency measures offer significant opportunities for new employment and training while support for innovation and development in harmony with nature facilitate delivery of national objectives for emissions reduction

and biodiversity and would build expertise that could be exported as other countries increasingly seek to decarbonise while restoring nature. NIMTF expects that the Green Growth Strategy will set out how to achieve this sustainability whilst promoting the recovery of the natural environment in the process and will be monitoring progress of the marine environment's recovery against this overarching Strategy.

Within this section, NIMTF would ask the NI Executive to clarify what they mean by "Regenerating natural systems" and if this applies to ecosystem function and services? NIMTF hopes that the marine environment will have a more prominent place within the NI Executive's plan regarding sustainability and growth to ensure that restoring natural marine systems can contribute to legislation and other policy components such as the Climate Change (Northern Ireland) Act 2022. Only then will we achieve productive, resilient and healthy seas which in turn will result in environmental, societal and economic benefits for NI.

The marine environment has a role to play in terms of tourism for NI, with many iconic locations on our coasts attracting local, national and international visitors annually, e.g. Giant's Causeway¹⁹, Rathlin Island²⁰, the Gobbins²¹, Strangford Lough²², etc. NIMTF would advocate for greater ambition and presence of the marine environment, both in terms of its sustainable use regarding increased tourism and the need to profile our seas as a valued tourism asset. By preserving our marine environment, we can increase tourism opportunities for NI, whilst preserving existing opportunities such as viewing wildlife spectacles of dolphins and seals in our loughs. However, this must be undertaken in a sustainable manner which supports marine recovery. Northern Ireland has the opportunity to lead the way in tourism that showcases the amazing diversity of natural habitats and species found around our shores. It is therefore imperative that our seas remain in a healthy condition to tackle the twin nature and climate crisis and to support a thriving society, providing multiple recreational and wellbeing benefits for NI citizens and those visiting our shores. Ensuring that the marine environment has representation in a Tourism Strategic Action Plan is something that NIMTF expects the NI Executive to incorporate into their PfG such as in our response to the Department for Economy (DoE) Draft Tourism Strategy²³.

Question 13. How much do you agree that the priority 'Cut Health Waiting Times' should be included in the Programme for Government?

Neither agree nor disagree

Question 14. The draft Programme for Government has set out actions that we plan to take under the priority 'Cut Health Waiting Times'. How much do you agree that these are the right actions to take?

Agree

Question 15. Please provide any other comments you have in relation to the 'Cut Health Waiting Times' priority:

Action: Implement and promote engagement with the marine environment through citizen science projects within social prescribing activities to improve physical and mental wellbeing in society.

Action: Long-term funding from Departments of Health and Communities to collaborate with DAERA on engagement with social prescribing activities to improve physical and mental wellbeing in society.

Action: Improve the conditions of freshwater and marine ecosystems to build passive improvements to mental and physical wellbeing.

NIMTF would welcome the addition of social prescribing^{24, 25} - opportunities and health programmes that link communities, GP practices and social activities designed to improve physical and mental health and wellbeing. These activities have added mental health and wellbeing benefits when linked to nature, however there are few activities across NI, such as Northern Ireland Environment Link (NIEL)'s Heritage 4 Health²⁶ and their Social Prescribing Toolkit²⁷, and wild swimming that takes place in Lough Erne²⁸. All of these connect communities with nature and are monitored for improving mental and physical wellbeing. Green Gyms²⁹, an initiative by The Conservation Volunteers, are used to improve the physical health of recovering physiotherapy patients, such as the one at Ayr & Ailsa Hospital, Scotland³⁰, alongside running sessions in the natural environment to improve the mental health of members of the public by providing a social space for people to reconnect to their natural world surrounding them.

Health and wellbeing can also be promoted alongside marine citizen science projects. Currently operating UK & Irish citizen science projects include Marine Conservation Society's (MCS) Seasearch³¹ and Beach Cleans³²; Keep Northern Ireland Beautiful's (KNIB) Adopt A Spot³³ and Healthy Oceans, Healthy Minds Campaign³⁴; marine mammal surveys through Irish Whale and Dolphin Group (IWDG)³⁵; Cuttlefish Conservation Initiative's Project Sepia³⁶ focusing on cuttlefish sightings and Shark Trust's the Great Eggcase Hunt³⁷. Participation in citizen science projects provide an opportunity for engaging members of the public with nature, improving their mental and physical wellbeing whilst contributing key data collection on the state of the marine environment.

By including these opportunities, we can utilise natural systems - given protections for these are in place - to improve the health of NI communities through involvement in citizen science, but also developing key points of ownership for communities to showcase what they love about their local marine environment. This will have strong links to ecosystem services from existing projects in place around Northern Ireland; such as improving water quality, pest eradication and citizen science projects. Poor water quality within our systems has a negative impact on the health & mental wellbeing of society, so by ensuring that our marine and freshwater systems are in a good state, we can influence public health positively.

Question 19. How much do you agree that the priority 'Better Support for Children and Young People with Special Educational Needs' should be included in the Programme for Government?

Agree

Question 20. The draft Programme for Government has set out actions that we plan to take under the priority 'Better Support for Children and Young People with Special Educational Needs'. How much do you agree that these are the right actions to take?

Agree

Question 21. Please provide any other comments you have in relation to the 'Better Support for Children and Young People with Special Educational Needs' priority:

Action: Departments of Education, Communities and DAERA must collaborate to ensure citizen science projects in the marine environment can be made more accessible for communities that are experiencing inequalities to environmental access.

Action: Cross-departmental action must take place to raise awareness of citizen science projects in the marine environment to create benefits across society.

NIMTF strongly advocates for the marine environment to be a resource that is available for all communities across NI. As we have highlighted the links previously to health, we must also highlight the importance of connecting communities from an educational perspective to our marine environment. By connecting communities to accessible programmes within the marine environment by adapting existing opportunities for those who are unable to gain access to the marine environment can also gain key knowledge and insights through engagement opportunities. There are several citizen science opportunities across NI as highlighted within our 'Cut Health Waiting Times' section that can be adapted to be inclusive for individuals with special needs and to encourage and foster a love for the marine environment by doing so: Currently operating UK & Irish citizen science projects include Marine Conservation Society's (MCS) Seasearch³¹ and Beach Cleans³²; Keep Northern Ireland Beautiful's (KNIB) Adopt A Spot³³ and Healthy Oceans, Healthy Minds Campaign³⁴; marine mammal surveys through Irish Whale and Dolphin Group (IWDG)³⁵; Cuttlefish Conservation Initiative's Project Sepia³⁶ focusing on cuttlefish sightings and Shark Trust's the Great Eggcase Hunt³⁷. Involvement and inclusion within citizen science programmes is not only educational, but it also helps to foster a sense of ownership amongst young people who will then go on to further improve the state of society and the environment. In the words of David Attenborough "No one will protect what they don't care about and no one will care about what they have never experienced." Therefore, being able to integrate stronger and more inclusive educational awareness about the marine environment to develop a stronger understanding of how the public can ensure healthy, productive and resilient seas is so important moving forward.

Question 34. Are there any other priorities that should be included in the Programme for Government?

As noted in this response. It is imperative that we see better representation of the marine environment, alongside the wider environment within this PfG.

BUILDING NEW FOUNDATIONS - Public Infrastructure

Question 35. How much do you agree that these are the right commitments in relation to the plans for investment in infrastructure?

Agree

Question 36. Please provide any other comments you have in relation to the plans for investment in infrastructure:

Action: Ensure that marine planning and licensing has marine recovery at its heart.

Action: Long-term investment for infrastructure should include actions for implementing nature-based solutions to support tackling climate change.

As mentioned previously, NIMTF welcomes the inclusion of infrastructure associated with tackling the climate crisis - e.g. renewable energy developments, but these must be done in conjunction with nature's recovery; including within the marine environment. NIMTF would like to see this focus echoed within this PfG to ensure that the work of this Executive takes into account the biodiversity crisis alongside the climate crisis. We are pleased to see an acknowledgement that "the planning system works for businesses, people, and the environment." NIMTF and members have been advocating for planning decisions to be carried out in harmony with the marine environment for a long time; this is especially important given the upcoming expansion expected in Offshore Renewable Energy Development. NIMTF welcomes the opportunity to participate in the planning improvement programme where relevant.

Strategic and fit for purpose marine planning and licensing which puts the environment at the forefront of decision making, is the key to the successful recovery of our marine environment. It should give activities and policies which prevent the achievement of healthy seas a lower priority and apply an ecosystem based rather than a sectoral based approach. Key to this is a spatially prescriptive Marine Planning which implements the Ecosystem Based Approach to decision making. Furthermore all development is set within environmental limits and positively integrated with Marine Strategy and MPA network goals.

NIMTF welcomes a long-term strategy of reaching net-zero, understanding that in order to achieve the objectives of the Climate Change (Northern Ireland) Act 2022, we must be ambitious across all sectors in reducing emissions and tackling our approach to resource utilisation. Twinned with the role of managing the water system, NIMTF welcomes the NI Executive's proactive approach in addressing historical challenges which have led to poor water quality within our rivers, lakes and seas. We must ensure that the potential to limit wastewater treatment does not become a potential option into the future; especially as water quality underpins the state of all activities taking place in the marine and freshwater environments.

MISSIONS

Question 37. The Executive have set out a long-term strategy to deliver three Missions, People, Planet and Prosperity, as well as a cross-cutting commitment to Peace. How much do you agree with a Missions-based approach?

Agree

Question 38. How much do you agree that these are the right Missions to focus on?

Planet - Strongly agree

People - Strongly agree

Prosperity - Neither agree nor disagree

Question 41. Planet Mission: A series of actions have been proposed under this Mission. How much do you agree that these are the right actions?

Agree

Is there anything else that should be included under the Planet Mission?

Action: Department of Infrastructure must work alongside DAERA to integrate soft-engineering into long-term planning options to help build climate resilience for coastal communities.

Action: Develop a Just Transition Fund for NI Fishing Sector to support their industry's transition to Net Zero.

Action: Ensure that marine environmental recovery is a cornerstone for all departments by raising awareness of the societal benefits to be gained.

NIMTF welcomes the inclusion of a "Planet" mission within the PfG and will continue to work with DAERA and the departments of Infrastructure and Economy; whilst also increasing our engagement with departments of Health, Education, Finance and Communities, as highlighted above, to ensure that we're driving forward on the importance of the marine environment and the role each departments has within their remit to contribute to marine recovery.

Areas such as "Flood Risk Management" are highlighted under this mission. It is welcomed that this is described as a cross-departmental issue, as support will be needed from the Department for Economy, Department for Infrastructure and DAERA to tackle the associated challenges with incidents like coastal flooding. Going forward, NIMTF would strongly advise against reactionary, hard-engineering options to mitigate the risks of coastal flooding across NI. Hard-engineering^{38, 39} options such as groynes, sea walls, gabions, rock armour and breakwater deliver immediate mitigation, but long-term problems, failing to restrict the flow of tidal energy, frequently redirecting flooding further down the system where support and mitigation measures have not been put in place. Conversely, soft-engineering options such as nature-based solutions, including the restoration of marine habitats (seagrass^{40, 41} and saltmarsh⁴²) act as a buffer, lowering wave energy, reducing impacts of coastal flooding. The restoration of coastal habitats such as saltmarsh has been shown to decrease ocean wave height by 80% and absorb excess rainwater during times of heavy rain, acting as a natural buffer and reducing the worst effects of coastal flooding⁴². However, we've lost most of the UK's blue carbon habitats, for example 39% have been lost since the 1980s, 44% have been lost since 1936, with a decline of 92% of seagrass extent surpassing 1930^{43, 44, 45}. The NI executive should channel time and resources into restoration of these habitats when addressing long-term flood management.

Developments to facilitate a net zero infrastructure must ensure that they are completed in harmony with nature - whereby we ensure that we are promoting recovery of marine habitats and species within the planning process, especially given the role the marine environment can play here. A mapping exercise was carried out across the whole Northern Ireland coastline by Ulster University, which covers the extent of 200 years' worth of maps, surveys and photographs which considers the rates and extent of erosion across NI's coastlines⁴⁶. This provides a key resource for the NI Executive

to incorporate in marine planning decisions for marine infrastructure to promote marine recovery that does not exacerbate the climate and nature crises.

NIMTF highlights a lack of an established Just Transition Fund for the Fishing Sector within this PfG. Transitioning away from destructive fishing practices has the potential to result in significant environmental benefits. A just transition requires early engagement with the fishing and seafood supply chain and the development and consideration of policy options for what transition will look like that does not negatively impact fishers and sea users, or the environment. NIMTF proposes a similar Just Transition Fund for NI's fishing sector as has been produced for the Agriculture sector to meet this requirement - not only under the Joint Fisheries Statement, but also for contribution to the Climate Action Plans. NIMTF expects the NI Executive to produce a similar framework for NI's fishing sector which outlines the route map to a successful transition to net zero.

NIMTF would like to see a greater focus on restoration within the PfG alongside the Climate Action Plans and improvements to water quality. This Executive is in the position to make the greatest headway in achieving the goals of environmental restoration, protection and management that is urgently needed. Water Quality is welcomed as an action, and we must ensure that this is cross-cutting, not just in terms of freshwater but also how water quality impacts on our seas.

Question 40. People Mission: A series of actions have been proposed under this Mission. How much do you agree that these are the right actions?

Agree

Is there anything else that should be included under the People Mission?

Action: Create stronger policy links to Health, Education and Communities with DAERA in terms of ecosystem services for society through Mental Health, Education and Community Engagement Strategies.

NIMTF welcomes the inclusion of the approach for "joint working across departments, statutory agencies and voluntary and community organisations" and proposes that the NI Executive consider the same approach in terms of the societal benefits of the environment and making firmer links between the departments of health, education and communities to the environmental sector. By increasing capacity across the different departments, we can integrate and build capacity for environmental protection by showcasing the domino effects of ecosystem services, community empowerment, upskilling and community ownership to the marine environment, given that we all communities utilise the marine environment for a variety of different commercial and recreational activities.

This should be built into the development of the Mental Health Strategy if there is a review. Whilst NIMTF understands that there is a second mission entitled "Planet", there is a real opportunity here for the NI Executive to bridge gaps across departments and scope to have a more holistic approach to their work. NIMTF will continue to advocate for cross-departmental approaches into the future in relation to the marine environment.

Question 42. Prosperity Mission: A series of actions have been proposed under this Mission. How much do you agree that these are the right actions?

Neither agree nor disagree

Is there anything else that should be included under the Prosperity Mission?

N/A

Question 39. Are there any areas that are not captured under these missions?

N/A

Question 43. A commitment to Peace will underpin the three missions (People, Planet and Prosperity). A series of actions have been proposed under this commitment. How much do you agree that these are the right actions?

Agree

Is there anything else that should be included under the commitment to Peace?

Question 44. Peace is framed as a cross-cutting commitment, rather than a mission. How much do you agree that this is the right structure?

Strongly agree

Please enter any comments in the box below

N/A

Understanding Missions by Tracking Wellbeing

Question 45. The draft Programme for Government outlines how it will measure progress through a Wellbeing Framework. How much do you agree with the proposed approach?

Agree

Please provide any further comments you may have in relation to your response

Action: Provide regular, publically available updates on the status of the metrics highlighted below. . These can be part of a wider benchmark to progress towards Good Environmental Status.

NIMTF has considered the metrics that are used in relation to the marine environment and listed them below:

- Air pollution
- Coastal water condition
- Condition of protected sites
- Greenhouse Gas emissions
- Outdoor recreation
- Recycled waste
- Renewable electricity
- River water quality
- Sustainable travel - public transport

NIMTF is pleased to see the recognition of coastal and river water quality and condition present as metrics for wellbeing, given the importance of the marine environment to wider society from a health perspective.

NIMTF notes in particular the metric assigned to the 'Condition of protected sites' and our current concern that our existing MPA Network is not being effectively managed to support marine recovery. To achieve this, an MPA sufficiency review will need to be incorporated as part of this metric, or a key output to ensure we are meeting the needs of designated features and communities using the area. To date, the 'spillover' effect that comes from well-managed MPAs globally has not been seen in NI, reflecting the lack of effective management and enforcement in place to achieve designated objectives.

As highlighted previously, outdoor recreation is incredibly important, with links to education and health and is a fitting metric. NIMTF's work on the marine environment is to ensure that our seas are healthy, productive and resilient for all marine users, with a focus on the marine species and habitats in the first instance. More users in the seas who are utilising the resource sustainably and respectfully would be welcomed and we will be analysing the effectiveness of these metrics through annual updates across the remainder of the term.

NIMTF will continue to monitor the application of these metrics to ensure the government is keeping to them. Given the previously highlighted issues around water quality derived from Lough Neagh and wider aquatic systems such as Belfast Lough, it will be important to frequently monitor these metrics to ensure the Executive is on track to meet improvements. NIMTF would welcome the opportunity to engage with the NI Executive further on different ways to achieve this, as well as highlighting our current, frequent engagements with DAERA on this topic.

Recycled waste is a welcomed metric that shows further work is needed; with NIMTF and members working on limiting marine litter entering water bodies at source from a policy and practical level respectively. A change in behaviour is needed, but it also needs to come from a shift in industry to utilise more biodegradable, plastic-free alternatives than what we currently have. Our previous work contributed to the ban on the sale of plastic-containing wet wipes not just for Northern Ireland⁴⁷, but for the whole UK⁴⁸.

Additional Information

Question 46. Do you have any further comments relevant to this consultation?

NIMTF thanks the NI Executive once again for the opportunity to respond to their PfG. This is an exciting time for NI with development of policies which look forward and the hope is to be ambitious and push the boat out to ensure that our marine environment has the opportunity to play its part in what is developing and into the future. To do so, we must work together, cross-departmentally to ensure we can achieve our holistic goals. By implementing our propositions within this response, we can ensure that we go further in our impact to serve society, environment and industries that depend on our seas.

For further information, please contact the NIMTF Officer, Robert Walsh at robert.walsh@nimtf.org

Annex

Table 1. Summary of NIMTF responses to relevant questions within the PfG consultation questionnaire.

Questions Answered	Summary Response
38 (People and Planet), 44	Strongly agree
7, 14, 19, 20, 29, 35, 37, 40, 41, 43, 45	Agree
8, 28	Agree (partially) - See 9 and 30 for Actions and further comment.
13, 38 (Prosperity), 42	Neither agree nor disagree
39, 42, 44 (Comments)	N/A
Priorities	
9 'Grow a Globally Competitive and Sustainable Economy'	See in text for Actions and further comment.
15 'Cut Health Waiting Times'	See in text for Actions and further comment.
21 'Better Support for Children and Young People with Special Educational Needs'	See in text for Actions and further comment.
30 'Protecting Lough Neagh and the Environment'	See in text for Actions and further comment.
34 'Other Priorities'	See in text for Actions and further comment.
36 'Building New Foundations - Public Infrastructure'	See in text for Actions and further comment.
Missions	
40 People	See in text for Actions and further comment.
41 Planet	See in text for Actions and further comment.
45 Wellbeing Framework	See in text for Actions and further comment.
Additional Information	
46 Further Comments	See in text for Actions and further comment.

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