



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, Causeway Coast & Glens Heritage 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: [Northern Ireland Draft 3rd Climate Change Adaptation Programme \(NICCAP3\)](#)

Submitted: 4th August 2025

NIMTF thanks DAERA for the opportunity to respond to Northern Ireland's Draft 3rd Climate Change Adaptation Programme (NICCAP3). Below we outline our responses to the questions and sections which are relevant to our remit and we have actions highlighted within: "Natural Capital", "Infrastructure Systems" and "People and the Built Environment".

Question 1

Were you aware of the two arms of climate change action before reading this introduction?

Yes

Question 2

How aware are you of climate mitigation actions being taken forward by government in NI?

1 Not aware

2

3

4

5 Very aware - 5

Question 3

How aware are you of climate adaptation actions being taken forward by government in NI?

1 Not aware

2

3

4

5 Very aware - 5

Question 4

Are you representing an organisation, or are these your personal views

Organisation

Northern Ireland Marine Task Force

Question 5

Do you agree with the approach taken to align the structure of NICCAP3 to the 13 thematic areas (covered above) used by the CCC to assist in the future monitoring of adaptation progress in NI?

Yes

Please provide further information

NIMTF agrees with alignment with the adaptation monitoring framework set up by The UK Climate Change Committee (UKCCC), given that the issue of climate change is not the sole responsibility of an individual sector. From NIMTF's remit, the areas which need to be considered for climate adaptation have been accounted for from a marine perspective, and these are the areas of this consultation which NIMTF has opted to respond to. Within the 'Nature' section of the CCC Adaptation Monitoring Framework, we are pleased to see that there will be alignment with the following components showcased within the Monitoring Maps:

- Marine and coastal habitats are in good ecological health
- Larger and more connected habitats
- Diverse habitats and species
- Protected and resilient habitats
- Use of Nature-based solutions (NbS) for adaptation
- Reduced pressures on ecosystems

NIMTF wants to ensure appropriate alignment within the current NICCAP3's section on 'Natural Capital' against the above CCC adaptive monitoring framework.

The CCC has provided scientific evidence to support the need for further action in order to tackle the issue of climate change. NIMTF met with the UKCCC in 2024 to discuss the role that blue carbon had to play, but were told that blue carbon habitats are currently under too many cumulative pressures to make a substantial and effective contribution towards the UK Greenhouse Gas Inventory¹. NIMTF agrees that the approach should align to ensure that we are alleviating pressures through the Blue Carbon Action Plan 2025 - 2030², which is intrinsically connected to the Marine Protected Area (MPA) Network and the release of the finalised, updated MPA Strategy.

Decarbonisation of sectors through Climate Action Plans (CAPs), Green Growth Strategy and the Offshore Renewable Energy Action Plan (OREAP) have all been acknowledged through the Programme for Government 2024 - 2027³. NIMTF have previously put in a response⁴ to the consultation. It will be important therefore that the NI Executive's PfG follows a structure which aligns with the rest of the UK to ensure cohesion across tackling the same issues.

Question 6

Do you feel that the vision, for a well-adapted NI, represents the ambition required to build a well-adapted NI?

Yes

Additional comments to support your answer

Yes, NIMTF feels that an ambitious overall vision is key to ensuring we build adaptation across Northern Ireland. The vision itself feels quite wordy and might need to be broken up a little, with the following suggestion to allow it to read better:

“By working with partners across all aspects of Northern Ireland’s environment, economy and communities, we will take action to build upon and strengthen our resilience to our changing climate. We will work towards creating a well-adapting and resilient Northern Ireland to both our current and projected future impacts of climate change; ensuring we protect our environment, economy and communities for both current and future generations.”

NIMTF questions where the oversight structure is for ensuring all of these actions are delivered and where this governance structure currently sits? There are numerous actions contained within NICCAP3, which have the potential to make a massive difference in tackling the joint issue of climate and biodiversity crises, but without a hand to steer overall, there are questions of who will hold those delivering these actions to account, unless this is to sit with the Climate Change Commissioner to oversee? There is limited time to make an effective impact for the future, to alleviate the current pressing issue of temperature, ocean acidification and rising sea levels facing the marine environment. The impact of these actions taken will need to be assessed and it is still unclear who will carry this out.

Question 7

Do you agree with the inclusion of actions in NICCAP3 from key stakeholders outside of Departments?

Yes

Additional comments to support your answer

NIMTF and its member organisations are providing core insights and actions to address issues within the marine environmental sector - furthering policies which will dictate the necessary protections, management and enforcement needed to ensure healthy, productive and resilient seas for Northern Ireland. This includes specific policies such as co-design and delivery of the MPA Strategy, Blue Carbon Action Plan, draft Seabird Conservation Strategy and Action Plan and the Elasmobranch Conservation Strategy. Other, more practical actions which are being carried forward from across the environmental sector through practical-based projects; some funded through governmental means, whilst others are through funding from PeacePlus which will further our understanding of ecosystem functioning of the marine environment, as well as going some way to addressing data gaps and furthering the actions of several aforementioned policies.

However, it is vital that there is a strategic steer from the Government to understand how all the good work is actually reducing the risks from climate change that is not currently mapped out and all the recommendations from the CCC are covered in relation to adaptation action and policy action.

Question 8

Does the objective for Natural Capital provide the level of ambition required to meet the challenge of climate adaptation in this area?

Yes, but needs further amendments

Additional comments to support your answer

NIMTF feels that the objective should be amended to better reflect the role that nature-based solutions can have within this space. NbS, whilst important, is not a complete solution and will also require sustainable developments alongside NbS to ensure successful uptake of actions. Not all NbS are appropriate to be used within an area and need to be included on a catchment-based approach. Ecosystem functioning values need to be adequately captured through the role that marine ecosystems have to offer - e.g. blue carbon habitats are able to provide additional values to tackle both climate change and biodiversity loss, but need to be effectively managed and their pressures reduced. NIMTF would propose the following for succinctness:

“We will use nature-based solutions where possible and establish sustainable practices across the land and water use sectors to build ecologically healthy, well-connected habitats which support increased species abundance, biodiversity and improved soil and water quality. In doing so, this will create a climate resilient environment rich in ecosystem services and functions, important for human wellbeing and environmental sustainability; whilst supporting sustainable agricultural, forestry, fisheries and aquaculture sectors which are important to the Northern Ireland economy.”

Question 9

To what extent do you think the detail in the chapters goes towards providing context for the thematic area and it’s associated risks and opportunities in respect of:

I. Nature

1 - Not at all

2

3

4

5 - To a Great Extent - **5**

1 <https://www.gov.uk/government/collections/uk-greenhouse-gas-emissions-statistics>

2

<https://www.daera-ni.gov.uk/sites/default/files/2025-04/Northern%20Ireland%20Blue%20Carbon%20Action%20Plan%20025%20%E2%80%93%202030.pdf>

II. Working Lands and Seas

1 - Not at all

2

3

4

5 - To a Great Extent - **5**

Question 10

To what extent do you think the actions in response to the CCRA3 risks and opportunities goes towards providing context for the thematic area and it's associated risks and opportunities in respect of:

I. Nature

1 - Not at all

2

3- **3**

4 -

5 - To a Great Extent

II. Working Lands and Seas

1 - Not at all

2

3- **3**

4

5 - To a Great Extent

Question 11

Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included in response to any of the risks or opportunities identified for this key area?

Need to ensure that there is a strong oversight and governance structure in place to ensure that these actions can be effectively and timely delivered and ensure strategic oversight as there needs to be more coordination into how the research and policy development and action on the ground are actually feeding into reducing the risks. As it currently stands, there are a lot of actions, but no true example of who is delivering oversight, accountability and ensuring progression towards delivery of these actions.

Question 16

Does the objective for Infrastructure Services provide the level of ambition required to meet the challenge of climate adaptation in this area?

Yes

Additional comments to support your answer

NIMTF have no further comment as the overall objective falls out of the main scope of our remit.

Question 17

To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of:

I. Water Supply

1 - Not at all

2 - **2**

3

4

5 - To a Great Extent

II. Energy

1 - Not at all

2 - **2(Not our remit)**

3

4

5 - To a Great Extent

III. Telecommunications and ICT, noting that this is a reserved policy area

1 - Not at all

2 - **2(Not our remit)**

3

4

5 - To a Great Extent

IV. Transport

1 - Not at all

2

3 - **3 (Not our remit)**

4

5 - To a Great Extent

Question 18

To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of:

I. Water Supply

- 1 - Not at all
- 2
- 3
- 4 - **4**
- 5 - To a Great Extent

II. Energy

- 1 - Not at all
- 2 - **2**
- 3
- 4
- 5 - To a Great Extent

III. Telecommunications and ICT, noting that this is a reserved policy area

- 1 - Not at all
- 2 - **2 (Not our remit)**
- 3
- 4
- 5 - To a Great Extent

IV. Transport

- 1 - Not at all
- 2
- 3 - **3 (Not our remit)**
- 4
- 5 - To a Great Extent

4 <https://nimtf.org/wp-content/uploads/2024/11/nimtf-response-programme-for-government-2024.pdf>

5 <https://nimtf.org/wp-content/uploads/2025/04/living-with-water-in-derry- -londonderry-infrastructure.pdf>

6

<https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Northern%20Ireland%20Climate%20Change%20Adaptation%20Programme%202019-2024%20Final-Laid.PDF>

Question 19

Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included in response to any of the risks or opportunities identified for this key area?

NIMTF notices that within “Appendix III - Infrastructure Services”, that the inclusion of the Living With Water in Belfast Project by NI Water is listed as a contributing action, however, development of this project was halted in 2024. The same table does not mention the Living With Water in Derry/Londonderry Project which was consulted on in 2025, with our response⁵ highlighting concerns that lessons were not learned from the Belfast Project. NIMTF would like to see a true reflection of what projects are taking place as part of NICCAP3 for this section to better reflect what work is being done. There is also a distinct lack of mention of the NI Coastal Forum in terms of coastal infrastructure being carried out across Northern Ireland, whilst the NIMTF project also gets a mention in this section, as well as in “Natural Capital” and “People and Built Environment”.

NIMTF would query what action is going to take place to fill any other identified gaps which this consultation brings to light. By forward planning, it will be possible to reduce the risk further and respond and implement the recommendations by the UK CCC. NICCAP3 should move away from a list of loosely structured actions as in NICCAP2⁶ and towards a comprehensive set of actions linked to key adaptation outcomes with an explicit theory of change linking them. Each outcome should have clear owners within the Government Departments and relevant indicators to track progress.

Question 20

Does the objective for People and the Built Environment provide the level of ambition required to meet the challenge of climate adaptation in this area?

Yes, but with further amendments.

Additional comments to support your answer

NIMTF would propose an amendment so that the new objective reads as:

“Recognising how dependent we are upon our built environment and the ability it has to shape and support our health and wellbeing. We will engage with community groups and organisations to increase community understanding of localised climate impacts, and their impact upon their health. By empowering communities to understand their local risks and develop innovative solutions making use of local knowledge and resources, we will build upon shared experiences to target and address the climate risks specific to them to improve the climate resilience of our communities.”

It will be important that the theme of “People and the Built Environment” goes hand in hand with “Natural Capital”, given the role that NbS have alongside hard infrastructure such as sea walls and other forms of hard engineering used to adapt to rising sea levels. By implementing long-term solutions such as NbS with enforced and effective management measures, issues such as sea level rise and potential saltwater intrusion can be mitigated by implementing measures today.

Question 21

To what extent do you think the detail in the chapters goes towards providing context for the thematic area and its associated risks and opportunities in respect of:

I. Towns and Cities

- 1 - Not at all
- 2
- 3 - **3 (Not our remit)**
- 4
- 5 - To a Great Extent

II. Health

- 1 - Not at all
- 2 - **2 (Not our remit)**
- 3
- 4
- 5 - To a Great Extent

III. Buildings

- 1 - Not at all
- 2
- 3 - **3 (Not our remit)**
- 4
- 5 - To a Great Extent

IV. Community Preparedness & Response

- 1 - Not at all
- 2
- 3 - **3**
- 4
- 5 - To a Great Extent

Question 22

To what extent do you think the actions in response to the CCRA3 risks and opportunities go towards providing for a well-adapted Northern Ireland in respect of:

I. Towns and Cities

- 1 - Not at all
- 2
- 3 - **3 (Not our remit)**
- 4
- 5 - To a Great Extent

II. Health

- 1 - Not at all
- 2
- 3 - **3 (Not our remit)**
- 4
- 5 - To a Great Extent

III. Buildings

- 1 - Not at all
- 2
- 3 - **3 (Not our remit)**
- 4
- 5 - To a Great Extent

IV. Community Preparedness & Response

- 1 - Not at all
- 2
- 3
- 4 - **4**
- 5 - To a Great Extent

Question 23

Are you aware of any actions not currently captured in the Annex to NICCAP3 that might be included in response to any of the risks or opportunities identified for this key area?

NIMTF wants to ensure that there is a keen link between actions taken from the Department of Infrastructure and DAERA with respect to NbS and ensuring there is a compromise between these and long-term, sustainable infrastructure developments. These developments need to be climate smart, taking into account the recent failure to acknowledge and integrate climate change decisions into infrastructure developments such as the A5 will lead to further delays in implementing action. It

is crucially important that we ensure there is compliance with existing and developing strategies, policies and legislation which will ensure we can tackle both the biodiversity and climate crises together.

Question 28

Do you agree with this decision?

Yes, but with amendments

Additional comments to support your answer.

NIMTF notices that within the document, it states that NICCAP3 itself does not produce any impact on the areas covered by the listed assessments, but that “it will be the responsibility of the owners of such policies or proposals to ensure they are individually screened or assessed as part of their development as appropriate.”

NIMTF wants to see that all policies and proposals resulting from NICCAP3 must be subject to the appropriate robust and competent environmental assessment.

NIMTF thanks DAERA for the opportunity to respond. Our greatest concern is highlighting the lack of oversight monitoring to ensure that these collective are additive, complementary and deliver. We must ensure that there is an established, transparent governance structure which incorporates adaptive learning into the delivery of oversight. As highlighted within the actions, NIMTF looks forward to working with the NI Executive Departments to represent the marine environment and ensure that it has a role to play in tackling the challenges we face; whilst improving the management and support for it.

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