



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: [Consultation on the Nature Recovery Strategy](#)

Submitted: 15th April 2026

NIMTF thanks DAERA for the opportunity to respond to the draft Nature Recovery Strategy (NRS), which alongside the Environmental Improvement Plan (EIP)¹, marks a key step in protecting and enhancing the natural environment and takes account of the marine, which has long been left at the sidelines in comparison to their terrestrial counterparts. Our response has been written with this in mind and solely focuses on the marine aspects of the draft NRS. NIMTF found it very difficult to comment on the Strategy in its current format with regards to the layout of the consultation questions, which feels cumbersome and clunky in areas, with extra steps in place and feels like more of a list of strategies than anything else. Our response will scrutinise the ambition of the strategy against the current state of play, through the EIP Annual Progress Report 2025-26² and the Habitat Regulations Overview Report Period 2019 - 2024 Northern Ireland - The Conservation Status of Terrestrial and Marine Habitats and non-bird Species (2026)³.

NIMTF is disappointed to see the diminished approach to protecting our marine environment, with specific strategies and action plans not considered, which NIMTF has proposed as new actions within the Strategic Objectives (SOs) below. It is our understanding that this Strategy should sit as the overarching umbrella of strategies that leads to the recovery of all nature, inclusive of the marine environment, across Northern Ireland, yet it should also bring a focused direction and streamline to what is being delivered by ensuing plans and strategies which follow. The Strategy itself does not highlight metrics or indicators to achieve the actions that it outlines and thus these have been supplied within the subsequent tables of our response. In Annex 1, we highlight the metrics and indicators which can be found within the UK Marine Strategy⁴ to help streamline and align marine recovery to national and international objectives.

Restructured Nature Recovery Strategy - Five Strategic Objectives

To ensure that Northern Ireland addresses the root causes of biodiversity loss and restores nature at scale, this strategy is organised around five proposed updated/revised strategic objectives (Table 1):

Table 1: Original versus Proposed and Updated Objectives for the draft Nature Recovery Strategy

<u>Original Objective in Draft Strategy</u>	<u>Proposed Updated Objective</u>
Objective 1: Well Protected Nature and Accelerated Restoration	Objective 1: Establish a Clear, Statutory Commitment to Nature Recovery
Objective 2: Reduction of the Pressures on Biodiversity	Objective 2: Restore and Protect Nature Across Land, Freshwater, Coastal and Marine Environments
Objective 3: Sustainable Use of Biodiversity Through Nature-Friendly Policies and Practice	Objective 3: Reduce Pressures on Nature
Objective 4: Nature Valued and Mainstreamed Across All of Government and Society	Objective 4: Mobilise Funding, Governance, Skills and Evidence to Enable Delivery
Objective 5: Building Strong, Integrated Evidence and Knowledge to Enable Action and Reporting for Nature	Objective 5: Nature Valued & Mainstreamed Across Society and the Economy

Revised Action Tables

‘Action No’ – Where actions already exist in the Draft Strategy, they are numbered in sequence. New actions are identified as *New*.

‘Original Action’ – The table presents the action as written in the Draft Strategy, alongside the suggested *Updated Action*.

‘Changes’ – Suggested changes are shown using four labels:

- No change – the action is already included in the Draft Strategy.
- Revised – a suggested improvement to the wording of an existing action.
- New – a suggested action not currently included in the Draft Strategy.
- Reconsider – the action is included, but a comment is provided explaining concerns or recommending a different approach.

‘Dates’ – Delivery dates are indicated for each action.

‘Indicators’ – Each action should have a clear, measurable success indicator. Progress toward these indicators should be assessed through a structured cycle of review points, with interim reviews in 2030, 2035 and 2040.

There are several gaps in the draft Nature Recovery Strategy where indicators are missing or incomplete. These must be developed before the Strategy is finalised or before any associated action plans are adopted. Without these indicators, it will not be possible to track progress or assess success. Clear indicators also support effective communication by explaining the rationale for each action, improving transparency and helping stakeholders and the public understand what the Strategy is trying to achieve.

We have aimed to set indicators at a level appropriate for strategic delivery, recognising that more detailed operational outputs will be required to ensure effective implementation. The indicators included in the action tables are designed to clarify what success looks like and to support open, transparent reporting.

For actions drawn from the Environmental Improvement Plan (EIP) but referenced within the draft Nature Recovery Strategy, we have suggested revisions where necessary. A central purpose of the Nature Recovery Strategy is to address weaknesses and gaps in the EIP; the proposed revisions are intended to ensure completeness, coherence, transparency and effective delivery.

The Strategies Objectives and Actions

Objective 1: Establish a Clear, Statutory Commitment to Nature Recovery

Northern Ireland cannot deliver nature recovery without a firm legal foundation. At present, we are the only UK jurisdiction without a statutory pathway for setting nature restoration targets. The Republic of Ireland (RoI) is also developing a National Nature Restoration Plan⁵ under the EU Nature Restoration Directive⁶. This absence of legal obligation has contributed to lack of accountability, leading to fragmented delivery, inconsistent ambition, and a lack of long-term continuity. Revised Objective 1 addresses this gap directly by establishing a clear, statutory commitment to nature recovery that aligns with the EIP, the Climate Change (Northern Ireland) Act 2022⁷ (hereafter referred to as the Climate Change Act), and the Kunming–Montreal Global Biodiversity Framework (GBF)⁸.

This objective ensures that nature recovery is treated as a legal duty rather than a voluntary aspiration. It sets out a structured process for consulting on targets, securing NI Executive approval, and embedding statutory reporting requirements. It also strengthens the legislative framework for species protection, protected sites, and biodiversity duties.

By grounding the strategy in law, Objective 1 provides the accountability, cross-government coordination and long-term stability required to deliver meaningful ecological recovery to 2030, 2040 and 2050.

Action Table 2 - SO1: Establish a Clear, Statutory Commitment to Nature Recovery

Action No.	Original Action	Changes	Updated Action	Delivery Date (End of)	Indicator
1.1	Consult upon setting targets in law for Nature Restoration and related civil sanctions.	No Change	Consult upon setting targets in law for Nature Restoration and related civil sanctions.	2027	Public consultation launched and completed within statutory timelines; cross sectoral responses received; consultation analysis report published summarising evidence, feedback trends and preferred policy options.
1.2	Following consultation, seek Executive support for setting targets in law for nature restoration.	No Change	Following consultation, seek Executive support for setting targets in law for nature restoration.	2028	Submission to Executive completed; Executive approval secured; interdepartmental consensus reached on scope and ambition; Ministerial direction issued for drafting legislation.
1.3	Consult upon a mandatory requirement to report on the implementation of the Biodiversity Duty.	No Change	Consult upon a mandatory requirement to report on the implementation of the Biodiversity Duty.	2027	Consultation launched and completed; cross sectoral responses received; consultation analysis report published.
1.4	Following consultation, seek Executive support for drafting legislation to implement mandatory reporting on Biodiversity Duty.	No Change	Following consultation, seek Executive support for drafting legislation to implement mandatory reporting on Biodiversity Duty.	2028	Submission completed; Executive approval secured; drafting instructions issued.
1.5	Undertake a review of other existing legislative provisions, particularly around species, biodiversity and enhancing protected landscapes.	Revised	Undertake a policy mapping exercise to account for other existing legislative provisions, particularly around species, biodiversity and enhancing protected landscapes.	2028	Comprehensive review completed and published, identifying gaps and recommending reforms to support nature recovery.

1.6	Consult upon taking forward a statutory requirement to monitor and publicly report on the condition of protected sites and to increase the amount of money available for nature restoration.	Revised	Consult on introducing a new statutory duty requiring sufficient monitoring and public reporting of the condition of all protected sites in Northern Ireland, supported by mechanisms to ensure adequate resourcing for this work.	2027	Consultation launched and completed; cross sectoral responses received; consultation analysis report published.
1.7	Seek Executive support for legislation requiring statutory monitoring and public reporting of protected site condition.	New	Submission completed; Executive approval secured; drafting instructions issued.	2028	Submission completed; Executive approval secured; drafting instructions issued.

Executive Approval and Current Mandate

There are many actions above which are subject to the remaining current mandate and Programme for Government 2024 - 2027 (PfG)⁹, yet the following actions will require NI Executive approval and run the risk of not being completed within the current mandate based on many being delivered by 2028 and therefore may not be picked up within the following mandate unless there are legally binding targets and actions to achieve them.

Actions 1.1 and 1.2

There is a Private Member's Bill (Environment and Nature Restoration Bill¹⁰) in development to ensure targets are set in law for nature, with the summary of consultation responses collated in 2025. As it currently stands there are no specific, dedicated targets in law for nature's recovery and we are witnessing real-time species declines taking place. This will require the commitment from the whole NI Executive to ensure that ecosystem services can be fully and properly accounted for. This is subject to the same concerns around needing NI Executive approval within the current mandate, or at risk of not being picked up in a future mandate.

Actions 1.3 and 1.4

Pressure needs to be kept on so that this does not fall behind, given that the EIP Progress Report² suggests that 30by30 will be "Progressing to new timelines". It will be important that if timelines are not adhered to, that a failure analysis is carried out to assess and address why and to ensure that timelines do not slip further.

Action 1.5

These already exist, or should be being built into things as they develop moving forward. It will be important to factor the work which has already been achieved when looking at a comprehensive

review of what has already been carried out. A strong example would be the links to the LandscapesNI project¹¹.

Action 1.6

This action reinforces the requirement of the ‘failure analysis’ to assess management measures, plans and must be part of the assessment to ensure effectiveness of any measures which have been implemented - ideally with a course correction time built in to facilitate a redirection where necessary. Failure analyses are outlined further within SO2.

SO2: Restore and Protect Nature Across Land, Freshwater, Coastal and Marine Environments

Northern Ireland’s ecosystems are deeply interconnected. Peatlands regulate water and carbon; woodlands support species and soil health; rivers and lakes feed into estuaries and coastal waters; and marine habitats underpin fisheries, biodiversity and climate resilience. Yet across all these systems, conditions are declining. Objective 2 brings together all habitat and species recovery actions into a single, coherent programme that restores ecosystem extent, condition and resilience at landscape and seascape scale.

This objective strengthens the management of protected areas, aligns the interconnected species and habitats by accelerating peatland and woodland restoration, supports species recovery, and delivers marine conservation strategies. It ensures that restoration is climate resilient, evidenced and aligned with statutory targets and international commitments. By 2030, Northern Ireland must halt biodiversity decline; by 2040 and 2050, we must deliver sustained ecological recovery. Objective 2 provides the route map to achieve this.

Action Table 3 - SO2: Restore and Protect Nature Across Land, Freshwater, Coastal and Marine Environments

<u>Action No.</u>	<u>Original Action</u>	<u>Changes</u>	<u>Updated Action</u>	<u>Delivery Date (End of)</u>	<u>Indicator</u>
2.1	Publish a suite of annual biodiversity indicators to report on progress against biodiversity targets, and to meet Environment Act, Kunming-Montreal Global Biodiversity Framework, Climate Change Act and NICCAP, and Green Growth	Revised	Define a suite of annual biodiversity indicators to report on progress against biodiversity targets, and to meet Environment Act, Kunming-Montreal Global Biodiversity Framework, UK Marine Strategy, Climate Change Act and NICCAP, and Green Growth	2026	Complete, quality assured indicator suite published annually by 2028, meeting all statutory reporting requirements and used to track progress.

	Strategy reporting requirements. (EIP)		Strategy reporting requirements. (EIP)		
	Continue to work with the Northern Ireland Species Recovery Partnership to deliver on Species Recovery Principles and 35 Species Action Plans to unlock greater long-term action at scale for species (EIP).	Reconsider; these actions, including those in the EIP and proposed in the draft NRS have significant overlap and should be reconsidered to ensure clarity and added impact.	Continue to work with the Northern Ireland Species Recovery Partnership to deliver on Species Recovery Principles and 35 Species Action Plans to unlock greater long-term action at scale for species (EIP)	2030	Species Recovery Programme operational by 2026, with annual delivery milestones reported.
2.2	Commence delivery of a recovery programme to demonstrate collaborative action to save species across Northern Ireland.		Deliver a programme of collaborative action to save species across Northern Ireland including	2030	Collaborative, landscape-scale species recovery programme initiated by 2028 with multi-partner delivery demonstrated.
2.3	Develop and implement nature recovery plans and programmes to secure effective management of our protected sites. (EIP)	Reconsider; these actions, including those in the EIP and proposed in the draft NRS have significant overlap and should be reconsidered to ensure clarity and added impact. The action must include taking forward designation.	Develop and implement nature recovery plans and programmes to secure effective management of our protected sites. (EIP)	2029	By 2029, all designated SACs will have Conservation Management Plans in place, consisting of a suite of management measures (EIP)
2.4	Develop a Protected Sites Delivery Plan for the stewardship of terrestrial and freshwater protected sites (designation, protection, management and restoration).		Develop and implement a comprehensive Protected Sites Delivery Plan covering terrestrial, freshwater, coastal and marine areas. This should include the designation, protection, management and restoration of protected sites; the development of protected site recovery plans and a	2026	Protected site monitoring framework and condition assessments published; annual reporting established.
2.5	Review landscape designations to define		Review of landscape and seascape	2026	At least 30% of land and

	the baseline of area which currently meets the 30 by 30 criteria on land and sea. (EIP)		designations to establish the current baseline for meeting the 30x30 target.		freshwater is protected, connected and managed for nature (EIP)
2.6	Deliver the actions in the Elasmobranch Conservation Strategy to improve and restore populations of priority and threatened species in the Northern Ireland inshore region. (EIP)	No change	Deliver the actions in the Elasmobranch Conservation Strategy to improve and restore populations of priority and threatened species in the Northern Ireland inshore region.(EIP)	2030	Elasmobranch populations which are “Critically Endangered” and “Endangered” reduce their threat categories to “Vulnerable” (Elasmobranch Conservation Strategy)
2.7	Deliver the actions in the Seabird Conservation Strategy to improve and restore populations of priority and threatened species in the Northern Ireland inshore region. (EIP)	No change	Deliver the actions in the Seabird Conservation Strategy to improve and restore populations of priority and threatened species in the Northern Ireland inshore region. (EIP)	2030	Seabird populations in decline are improving to restored populations through increased breeding pairs (Seabird Conservation Strategy)
2.11	Implement the actions in the Northern Ireland Marine Protected Area Strategy. (EIP)	No change	Implement the actions in the Northern Ireland Marine Protected Area Strategy. (EIP)	2030	85% of marine features to be in “Favourable” condition, with 10% in “Unfavourable/Recovering” (EIP)
2.13	Explore options for supporting the establishment of a conservation traineeship scheme	Revised	Assess skills gaps and workforce needs for nature recovery and develop pathways, training opportunities, and succession plans to strengthen long-term capacity across the environmental sector	2026	Sector-wide skills and workforce needs assessment completed and options for a conservation traineeship scheme developed by 2027.

		New	Deliver and implement the actions of the Blue Carbon Action Plan 2025-2030 to protect, restore, and enhance blue carbon habitats and strengthen their contribution to climate mitigation and nature recovery.	2030	Blue Carbon Action Plan delivered, with baseline assessment completed and priority restoration projects initiated.
		New	Implement the actions within the 4 th River Basin Management Plan 2027-2032.	2032	Increase the number of water bodies at Good Ecological Status to 50% by 2030.
		New	Undertake a comprehensive habitat restoration gap analysis to identify restoration needs across all priority habitats, including grassland, freshwater and develop an associated list of actions to include in the NR Strategy.		Comprehensive habitat restoration gap analysis completed and published, informing a coordinated restoration programme.

Actions 2.1 and 2.2

NIMTF requires further work to be done to establish a strong link between the existing NI Species Recovery Partnerships, Species Recovery Principles and 35 Species Action Plans with the delivery of a recovery programme, given that one is proposed to have been completed 2 years prior. From a marine perspective, it is unclear whether or not the existing NI Species Recovery Partnerships include marine species and habitats as they are currently specific to niche species. NIMTF feels that this area might serve better in assessing gaps from the previous Joint Nature Conservation Committee (JNCC 2018 analysis on our MPA Network¹² to see the current progress and where further work needs to be done; alongside work which is the current focus of potential work under the proposed Landscape Connections Heritage Lottery Funding bid. NIMTF would like to ensure that the relevant indicators from the UK Marine Strategy⁴ have also been considered and linked with as found in Annex 1.

A series of different indicators exist:

- UKMS (Annex 1) updated indicators¹³
- General indicators of UKMS (Annex 1)⁴
- JNCC Updated Metric Indicators for Assessments¹⁴
- OSPAR Framework indicators for quality status reports (winter nutrient concentrations¹⁵, seafloor dissolved oxygen¹⁶ and chlorophyll-a concentrations¹⁷)

- Celtic Seas Quality Status Report (2000)¹⁸
- Synthesis Report (2023)¹⁹

Action: DAERA to assess where existing Species Recovery Partnerships include marine species and habitats for the Species Recovery Principles and Species Action Plans.

Action: DAERA to implement remaining actions from the JNCC 2018 Analysis on the MPA Network.

ACTION: DAERA to establish links to indicators within the NRS to the UK Marine Strategy (see Annex 1).

To convert this target into something more robust, NIMTF would like to see the recovery programme being more detailed and developed before it can be delivered - which should be the alternative focus of this action. There are prioritisation criteria to be met under the Blue Carbon Action Plan 2025 - 2030 (BCAP)²⁰, alongside other processes and frameworks for identification of feasible measures that achieve outcomes for both land and sea. As it stands, the BCAP has not been accounted for within the draft NRS and so has been included within Table 2. Gaps for this area need to be addressed, especially in relation to achieving 30by30 under the GBF. Alternatively, the Howell Marine Consulting Report carried out in 2024²¹ highlights that all MPAs which do not have management plans, will need management plans in place by 2028 (2029 for Special Areas of Conservation (SACs) as Conservation Management Plans), as reinforced by the Annex A - Northern Ireland Inshore Marine Protected Area Network Report 2019 - 2024²², the EIP¹ and the MPA Strategy for the Northern Ireland Inshore Region 2025 - 2030 (hereafter referred to as the MPA Strategy)²³. These should be enshrined within the draft Nature Recovery Strategy.

Action: DAERA to provide greater detail of the development of the recovery programme which demonstrates collaborative action to save ALL species across Northern Ireland from land and sea.

Action: DAERA to establish a roadmap to developing and implementing MPA Management Plans for remaining designations currently without them.

Action 2.3

MPA Management Plans and Condition Assessments

Presently condition assessments are only in place for ASSIs, not for other types of MPA designation such as SPAs or SACs which have international requirements, even under the transposed EU Law. The OEP have highlighted that the majority of the offshore MPAs across the UK have been assessed using vulnerability assessments²⁴. NI's MCZs and some marine SACs have Storymaps which have been created, but a core requirement to better understand progress and targeted needs for SPAs would be a Sufficiency Review across the whole of NI. A review was conducted in 2015-2017, which made recommendations which have still not been fully implemented; with approximately two-thirds having been implemented by DAERA-NIEA²⁵. A UK-wide Phase 1 review was published in 2016, with a Phase 2 report which focused on the SPA insufficiencies was published in May 2025²⁶. The OEP began an investigation in 2024 in relation to SPAs²⁷, which highlighted that it would "*seek to understand the*

progress of SPA reviews in the marine environment” in relation to the lack of implemented recommendations highlighted cumulatively across the last decade:

- Icelandic Greylag Goose (*Anser anser*): **Inclusion of NI SPAs alongside Northern England and Scotland to form the suite to be used as the baseline for Phase 2.**
- Hen Harrier (*Circus cyaneus*) (breeding): **2 SPAs identified for breeding Hen Harriers in Northern Ireland.**
- Curlew (*Numenius arquata*) (breeding): **Several sites which could be considered for classification in Northern Ireland, including reviewing SPA boundary (as identified in Phase 2).**
- Cormorant (breeding): **Requires reviewing of the SPA boundary for Sheep Island (as identified in Phase 2).**
- Berwick’s Swan (non-breeding): **Requires a more detailed review of the data associated with Lough Foyle and to set appropriate enhanced management at some sites to consider ameliorate factors which are leading to reduced numbers (as identified in Phase 1)**
- Sandwich Tern (breeding): **Site condition and management should be considered at SPAs where numbers have shown major decreases.**
- Fulmar (breeding): **Research to be undertaken to investigate whether populations have moved to other non-SPA sites, or been lost to inform possible conservation responses.**

There has been difficulty in assessing the spatial extent of sites within the existing MPA network, as highlighted within the OEP’s assessment of the MPA Review for Northern Ireland (page 5)²⁴, which has resulted in limited ability to cross-reference area to feature to assess progress towards the international target of 30by30. This is due to the current focus of feature-based monitoring as opposed to using area-based monitoring. JNCC have tried to work with existing structures, having used the same approach as Scotland, where the information is extrapolated, but this has the potential to diminish accuracy of data (JNCC, *pers. corres.*). In NI there is the difficulty between distinction of “features” or “area”, where thresholds may have been reached such as “75% of number of features” which is then classed as good. Additional considerations needs to include further categories of risk such as drivers and pressures, which NIMTF have provided in previous responses to the OEP’s Call For Evidence on the Review of Drivers and Pressures Affecting the UK Marine Environment²⁸, Review of Environmental Governance in NI²⁹, the Northern Ireland Environment Agency’s (NIEA) Call for Evidence on the Impacts on the Water Environment³⁰ and within our response to the UK Marine Strategy - Part One³¹. It will be important to utilise the information contained within these responses to explore if sufficient assessment to the return-rate of action on these drivers and pressures is successful through the development of a Risk Register, as has been established through the Crown Estate with their MPA Risk Mapper layers³².

Action: DAERA to implement the remaining recommendations from Phase 1 and Phase 2 SPA Sufficiency Reviews.

Action: Condition Assessments or Vulnerability Assessments (where a Condition Assessment is not feasible) should be in place and on the 6-yearly cycle with review at the 3-year mark for SPAs and SACs for NI.

Action: DAERA to work in conjunction with JNCC to re-assess the metrics used for Condition Assessments/Vulnerability Assessments to achieve area-based assessment rather than feature-based assessments.

Action: DAERA to develop an MPA Risk Register which works in conjunction with the Crown Estate's MPA Risk Mapper layers.

Feedback Loops or "Failure Analysis"

NIEA and DAERA have indicated that they are struggling with sites which are still in poor condition, even if management measures are in place. It is important that feedback loops, or "failure analyses" are factored into current condition assessments/vulnerability assessments for protected areas. This would ensure that their associated management and restoration actions to secure effective management and ensure the success of implemented nature recovery plans and programmes. This applies not only to failure, but also to areas where there is good progress so that lessons can be learned and applied through a tailored approach to support best practice amongst other devolved nations, or with cross-border neighbours such as RoI. This includes monitoring where restoration and positive management is spatially occurring to assess future management as a step-wise to demonstrating positive interventions. The application of continued monitoring would further develop interventions to support this feedback loop to establish more of an outcome-based approach rather than an indicator.

It is important that we focus on the processes by which these actions will be delivered which will address where the need for nature's recovery is at its greatest, as highlighted by the State of Nature Report 2023³³, Seabird Report 2025³⁴ and the Habitats Regulations Overview Report for the Reporting Period 2019 - 2024 The Conservation Status of Terrestrial and Marine Habitats and non-bird Species (2026) which shows that only 4 out of 18 marine and coastal habitats are in favourable conservation status³; indicating which species and habitats are currently at greatest risk. There is a plethora of evidence which NIMTF and our member organisations have highlighted over the years to the continued decline of our local species and habitats - so NIMTF want to see an improved, robust way of assessing how we are going to use new and future resources to achieve success through a roadmap to delivery, whilst taking into account the proposed implemented feedback mechanisms which considers why projects have not been delivered.

Action: DAERA to implement feedback loop mechanisms into their management plans and monitoring assessments to ensure adaptive management can be integrated into management plans.

Action: DAERA to ensure that processes are outlined fully alongside governance, responsibilities and actions to ensure accountability to addressing actions relating to nature's recovery.

Action: DAERA to ensure alignment with the UK Marine Strategy indicators (Annex 1)

Action 2.5

This is far more clear cut within the marine environment - ideally within the marine, existing MPA designations require management measures to address the identified issues within the Conservation Objectives. NIMTF has calculated that 2.7% of the total sea has developing MPA Management Plans in place, whilst only 11.2% of the total sea has fisheries management measures in place, but without enough concrete data to suggest a whole-site approach to condition, it is unclear the true extent of meeting the 30by30 criteria.

Action 2.6 and 2.7

There are links to the Fisheries Management Plans which will directly contribute to the achievement of key actions for the Elasmobranch Conservation Strategy³⁵ and the Seabird Conservation Strategy and Action Plan³⁶ (see Table 3) under SO3. These two strategies will be vitally important given that the state of seabirds are in decline within the Seabird Report 2025 for particular species such as Fulmar, Cormorants, Black-Headed Gulls, Sandwich Terns, Common Terns, Arctic Terns³⁴, whilst there are still major gaps within elasmobranchs, hence the strategy focusing on management and monitoring for specific species measures³⁵.

Action: DAERA to cross-reference actions 2.6 and 2.7 within SO2 with those under SO3 in relation to Fisheries Management Plans to ensure conservation of seabirds and elasmobranchs in NI.

Actions 2.13

NIMTF would usually welcome this proposal, especially as it encourages more people into the work of conservation and will guarantee the most appropriate skills are in place to ensure robust and ambitious actions are delivered. However, we would also question the relevance in terms of whether this should be within this strategy or a combined action plan/strategy alongside the Department for Economy (DoE) or Department for Communities (DoC). It is currently unexplained whether this is intended to be delivered externally by eNGOs, or if this will be internalised; or how it is intended to be funded moving forward, including if it will receive matched funding to guarantee delivery. Funding is addressed through SO4. NIMTF is in agreement that there does need to be skill-based delivery of practical projects to support the delivery of projects, but these need to be in the correct place and needs to horizon scope to ensure that this proposal is effective and appropriate for the Strategy.

Action: DAERA to further develop their intentions, process and future routemap for establishment of a conservation traineeship scheme by developing future capacity for jobs alongside Departments for Economy and Communities.

Whilst it is welcomed that DAERA are considering greater inclusion from traineeships as part of this Strategy, NIMTF and our members wonder if there should be a greater focus on the mechanisms for applying those traineeships to skilled jobs upon completion. As it currently stands there is no functional follow-on endpoint for traineeships as there is not enough robust, ring-fenced funding for nature recovery - e.g. Environment Fund 2023 - 2028³⁷, Marine Environment and Fisheries Fund

(MEFF)³⁸ and PeacePLUS projects³⁹ currently take us to 2029 at most. One of the greatest challenges that trainees face is retention to NI or the Republic of Ireland (ROI) as the majority of individuals who get trained end up going further afield and take those skills away with them; hence the need to retain those highly skilled individuals. Further information relating to overall funding mechanisms are highlighted in our section on SO4.

Action: DAERA to outline for ALL actions within the Strategy what funding mechanisms are intended to deliver effectively and align these under SO4.

Attracting traineeships would improve on the lack of available individuals with the skills to go straight into marine conservation and restoration. The majority of eNGOs take on voluntary student placements in alignment with Universities such as Queen's University Belfast, Ulster University and University of Galway (ROI) if they are Belfast-based. NIMTF would welcome a direct link to the Nature Recovery Networks^{40,41} and associated partnerships. For further information on Nature Recovery Networks, please contact Nina Schönberg on nina.schonberg@ulsterwildlife.org.

Further work needs to clarify what types of accreditation is expected for trainees to receive and whether it meets the following criteria:

- Recognised and highly valued skillsets for employment
- Transferable to other areas of employment
- Core component providing skillsets which meet demands - e.g. GIS gaps
- Bespoke level training
- Links to the Green Growth Strategy and Just Transition Commission
- University-level - e.g. Marine Biological Association accredited Marine Biology
- CIEEM certifications
- Bolt-on to existing accreditations

NIMTF are hopeful for lots of green jobs within the future as we have seen through the influx of almost €25m PeacePLUS funding which was allocated in 2025 to marine and coastal management⁴², however there needs to be jobs available for individuals to step into which makes the training worth it to retain individuals locally to ourselves. DAERA needs to work with different departments within the Executive to build and develop wider opportunities for trainees to enter into the workforce. As part of this target (if the proposal becomes finalised), NIMTF would like to better understand how progression and achievement will be recorded in the future to assess this.

Action: DAERA to establish criteria based on the above for assessing what accreditations the conservation traineeship scheme will link to, or deliver on in terms of skills.

Action: DAERA to engage with other NI Executive Departments to build wider opportunities for trainees upon completion of their traineeship.

New Proposed Actions:

Inclusion of the BCAP

NIMTF would like to see acknowledgement of the BCAP, which sets out to establish, restore and maintain new and existing blue carbon habitats and has core overlaps with the MPA Strategy. Additionally, there is no mention about the draft NI Marine Plan⁴³, or links to the Offshore Renewable Energy Action Plan (OREAP)⁴⁴ (which we will return to in SO3), of which the BCAP would overlap with. There should be a complete list of actions within the EIP laid out within the Nature Recovery Strategy and these should be detailed fully. This does not take into account KPIs which eNGOs have set - e.g. WWT are looking to restore 100k hectares of saltmarsh across the UK⁴⁵, of which is unknown what the NI proportion/allocation would look like. NIMTF has already established the strong connections that this has to Action 2.3 under SO2.

It is important that the inclusion of the BCAP in relation to the MPA Strategy needs to incorporate a “climate-smart analysis” to future-proof the MPA Network against the rising impacts of climate change. This work has been finalised through a commissioned report entitled ‘MPAs in Relation to Climate Change for Northern Ireland’ (2026) by Ulster Wildlife⁴⁶, in conjunction with Plymouth Marine Laboratory. This will focus on what areas are classed as climate brightspots - where conditions improve under a changing climate; climate refugia - where conditions remain stable under a changing climate; or climate hotspots - where conditions decline under a changing climate. Further information on climate change as a pressure can be found in the section on SO3.

River Basin Management Plans (RBMPs)

There are no actions which discuss wastewater pollution levels entering our wider water systems, outside of addressing ammonia from agricultural inputs. Specific mention to reduce the amount of phosphorus applied in chemical fertilisers, but nothing about reducing the amount of nitrogen/nitrates in chemical fertilisers which should make reference to the River Basin Management Plans through regulation. NIMTF would like to know how issues such as slurry being dumped onto fields during poor weather^{47,48,49} and then directly transferring into both freshwater and marine systems will be addressed as no actions highlight this from a whole-catchment approach which considers “source-to-sea”. In Strangford Lough, AFBI are assessing the catchment around the intertidal area, but it is unsure if they are collecting data from on land. NIMTF have provided core examples in our response to the Nutrients Action Programme consultation, but will detail financial penalties in relation to water quality here and marine-related issues on water pollution incidents:

- As of February 2025, less than 3% of farm pollution incidents have resulted in a prosecution⁵⁰.
- A total of £13,750 fines issued between 2021 and 2024⁵¹.
- In 2023, an investigation into the true nature of documentation found that falsified claims had been made, resulting in one such fine totalling £21.89⁵².
- In February 2025, one case received a fine totalling £515 for discharging into the Articlave River for June 2023⁵³.

- In 2025, one case received a fine totallin £1515 for polluting the Ballymoney River in June 2024⁵⁴.
- Another received the same fine for discharging into the Claggan River in the same period⁵⁵.
-
- Both Belfast Lough and Strangford Lough had confirmed blue-green algae sightings in Summer 2024⁵⁶.
- Blue-green algae found on the North Coast, leading to a bathing ban in 2025⁵⁷.
- Blue-green algae found at Portstewart Strand in 2025⁵⁸.

The Office for Environmental Protection have been investigating issues on water pollution incidents within NI, with two open investigations^{59,60} and one closed⁶¹. Given that the consultation document itself highlights specific issues such as water pollution (page 34), it is odd that this has not been addressed through any of the detailed actions. There will need to be links to the reformed SO3 - Pressures and Drivers.

Comprehensive Habitat Restoration Gap Analysis - SMART Targets and 30by30

NIMTF welcomes the connection, inclusion and reference to the GBF 30by30 overarching target throughout the Strategy, but acknowledges that there is little which demonstrates on the ground, practical action, particularly there is no reference to a delivery plan (DAERA Minister, *pers. comms*). Much of the practical, on-the-ground delivery has been co-designed over multiple years with a wide net of stakeholders and it is disappointing to see that the work has not been reflected within this strategy. Ulster Wildlife produced a report entitled 'Nature & People are Grand' (2025)⁶² which assessed current progress towards achieving 30by30 as a foundational roadmap, which NIMTF would like to see being utilised greater in conjunction with achieving mutual targets and objectives within both. This report was utilised within the Environment LINKS UK report entitled '30x30 2025 UK Progress Report' highlighting difficulties in assessing the progress for marine given the data deficiencies⁶³.

When comparing this Strategy to the EIP, it shows that there are glaring gaps, where some actions do not correspond or correlate to those within the EIP. The strategy itself is less broad and less specific when comparing to the EIP, with no specific themes throughout to make it easier to assess targets specific to the marine environment, or where themes are cross-cutting, resulting in difficulty in drawing comparisons between both legislative pieces - e.g. there is no mention in relation to connecting society to the environment through amenity or ecosystem benefits and the current SOs would benefit from inclusion of these being explicitly stated. Current work is being carried out in relation to Nature, Towns and Cities⁶⁴ - such as the Belfast Nature, Towns and Cities⁶⁵ work alongside relevant Local Development Plan which considers the marine environment as part of this work. As outlined within this response and the re-organised actions and SOs, there is an attempt to fix the disconnected and disjointed strategy to reduce complexity.

Action: SOs need to be SMART, including their actions and include an acknowledged wording for budgetary commitments.

SO3: Reduce Pressures on Biodiversity

Restoration alone cannot succeed if the pressures driving ecological decline continue unchecked. The OEP’s assessments show that nutrient pollution, chemical contamination, invasive species, unsustainable land-use change, climate impacts and direct exploitation are the dominant drivers of biodiversity loss across Northern Ireland⁶⁶. These mirror the IPBES 5 key drivers for biodiversity loss globally⁶⁷. SO3 takes the actions that fall under these drivers and combines them under one objective.

This objective strengthens pollution control, improves air and water quality, reforms wastewater infrastructure, implements nutrient and ammonia reduction programmes, enhances biosecurity, and ensures sustainable management of fisheries and aggregate extraction. It also embeds climate adaptation across ecosystems. By reducing pressures systematically and measurably, this objective creates the conditions for nature to recover and remain resilient.

Action Table 4 - SO3: Reduce Pressures on Biodiversity

<u>Action No.</u>	<u>Original Action</u>	<u>Changes</u>	<u>Updated Action</u>	<u>Delivery Date</u>	<u>Indicator</u>
Pressure: Pollution					
3.1	Publish a Plastic Pollution Plan	Reconsider; there is co-dependency within these actions and imbalance in the granularity	Publish a Plastic Pollution Plan – that included initiatives to reduce the use and waste of single use plastic	2026	Plastic Pollution Plan published by 2026 with annual progress reporting on actions and reductions in plastic waste.
3.2	Introduce a Deposit Return Scheme to help reduce waste and eliminate single-use plastic pollution. (EIP)				
3.3		New	Implement the Nutrients Action Programme to reduce nutrient pollution and improve water quality across Northern Ireland.	2026	Nutrients Action Programme fully implemented with annual reporting on compliance and reductions in nutrient pollution on track to achieve targets.
3.4		New	Deliver improvements to wastewater and sewerage infrastructure to reduce pollution and support	2026	Priority waste-water infrastructure upgrade programme initiated with measurable

			compliance with environmental standards.		reductions in overflows and pollution incidents.
3.5		New	Implement the Ammonia Strategy to reduce ammonia emissions and protect sensitive habitats across Northern Ireland.	2026	Reduce agricultural ammonia emissions to reduce their impact on fragile ecosystems in line with targets in the Ammonia Strategy. (EIP)
Pressure: Invasive Species					
3.6	Develop a new Invasive Species Strategy.	Reconsider; these actions have significant overlap and co-dependency and should be reconsidered to ensure clarity and effective delivery	Deliver initiatives for pollinators in Northern Ireland, (based on new All-Ireland Pollinator Plan for 2026-2030) including promoting sustainable pollinator-friendly actions for farmland and communities.	2028	All-Ireland Pollinator Plan 2026–2030 published with an agreed NI workplan implemented - to reduce coverage of those invasive species considered to be 'Widely Spread' by 50% from the 2015 baseline.
3.7	Develop an All-Island Invasive Species Management Plan and associated measures through a Shared Island Invasive Species and Biosecurity Initiative, a partnership between NIEA, the National Biodiversity Data Centre and NPWS.				
Pressure: Climate Change					
3.8	Publish the third Northern Ireland	Revised	Implement the actions of the	2029	Third Northern Ireland Climate

	Climate Change Adaptation Programme to set out actions to respond to the risks posed by climate change. (Now to be delivered by 2026) (EIP)		Third Northern Ireland Climate Change Adaptation Programme 2024-2029, embedding nature-based solutions at the heart of the response to climate risks and supporting resilient ecosystems, communities, and infrastructure.		Change Adaptation Programme published with nature-based solutions embedded and annual progress reporting in place.
3.9	Implementation of the Climate Change Act (Northern Ireland) 2022, including development and implementation of 5 yearly climate action plans in order to achieve the statutory 5 yearly carbon budgets which will be set under the Act and the 2030, 2040 and 2050 emissions reduction targets within the Act. (EIP)	No change	Implementation of the Climate Change Act (Northern Ireland) 2022, including development and implementation of 5 yearly climate action plans in order to achieve the statutory 5 yearly carbon budgets which will be set under the Act and the 2030, 2040 and 2050 emissions reduction targets within the Act. (EIP)	Ongoing	Five-yearly Climate Action Plans delivered on schedule with annual reporting on emissions reductions and carbon budget compliance.
Pressure: Land Use Change (Agricultural Intensification & Urbanisation/Infrastructure)					
3.10	Explore and review options around the adoption of a biodiversity net gain approach within the planning system.	Revised	Assess and develop proposals for adopting a biodiversity net gain approach within the planning system, ensuring a clear, evidence-based pathway for implementation.	2028	Evidence review and options for a biodiversity net gain approach completed and published for consultation.
Pressure: Direct Exploitation					

3.12	Develop Fisheries Management Plans to deliver sustainable commercial fishing in Northern Ireland waters. (EIP)	Existing		2025	Fisheries Management Plans implemented with annual reporting on stock status, compliance and ecosystem impacts.
3.11	Implement Fisheries Management Plans to ensure that negative impacts of fishing on ecosystems are minimized and stocks are not overexploited.	Existing		2030	Fisheries Management Plans implemented with annual reporting on stock status, compliance and ecosystem impacts.
		New	Develop management measures for other commercially exploited species, such as (wrasse, eel, salmon, trout) and recreational fisheries, to ensure sustainable harvesting and ecosystem protection.	2030	Management measures for wrasse, eel, salmon, trout and key marine species developed and published, with clear sustainability objectives and implementation timelines.
		New	Develop and implement sustainable management measures for aggregate extraction on land and at sea to minimise environmental impacts and protect sensitive habitats.	2028	A measurable reduction in the area of sensitive habitats affected by aggregate extraction by 2030
Pressure: Marine Spatial Planning					

		New	Publish the NI Marine Plan with NI Executive approval to ensure marine and coastal developments can be planned through a sustainable framework	2027	An NI Marine Plan is in place to support sustainable developments at sea.
		NEW	Develop and publish the Offshore Renewable Energy Action Plan (OREAP) to ensure that future offshore renewable energy developments are done sustainably	2030	An OREAP is in place to support sustainable developments at sea.
		Existing	Develop and publish an Underwater Noise Action Plan (EIP)	2028	Underwater noise thresholds are developed to support sustainable developments at sea

Actions 3.1 and 3.2

There is no mention of litter or any engagement with the wider public on achieving these goals. We recognise a note on a communications strategy in other parts of the strategy, but little else. It is disappointing that, when considering biodiversity, the word "litter" does not feature at all in this document. The Cleaner Neighbourhoods⁶⁸ and Marine Litter Reports⁶⁹ highlight the costs to our wildlife and broader environment. Worryingly, NIMTF member, Keep Northern Ireland Beautiful (KNIB)'s recent reports have noted a stagnation in litter levels, which is also affecting our biodiversity recovery in Northern Ireland. Litter can contain toxins that harm wildlife and affect other areas, such as soil quality. This is why tackling litter needs to be at the heart of this.

We would also like to see a focus on litter whenever we are talking about pollution. There is a substantive impact on our biodiversity. It is welcome to see a reference to the Plastic Pollution Plan NI (PPPNI)⁷⁰ and the introduction of a Deposit Return System (DRS), which will have a positive impact. However, the absence of litter from this strategy creates a disjointed policy approach. Marine Litter⁶⁹ and Cleaner Neighbourhoods Reports⁶⁸ have highlighted the impact of plastic litter in particular, and this needs to be part of the strategy if it is to be credible in improving nature recovery.

Therefore, NIMTF welcomes the inclusion of the publication and implementation of the PPPNI⁷⁰, having responded to the consultation⁷¹, given its importance and relevance to the marine environment. Under the UK Marine Strategy, there is a “Marine Litter” indicator⁷² which is failing to meet GES. Whilst GES has been met for ‘Beach Litter’, the Marine Litter Surveys are still consistently finding plastic pollution persistently on our beaches and within the top 10 of items being counted. From Annex 1 it can be seen that ‘Seafloor Litter’ and ‘Floating Litter’ metrics are not used within the Celtic Seas and this metric should be further developed to assess levels of plastic pollution entering migratory species through food webs.

There is an interconnectedness between the PPPNI and the DRS and therefore would need to understand the hierarchy of the strategy and scheme to ensure that we develop these further through implementation and monitoring to guarantee success.

Actions 3.6 and 3.7

It is confusing as to why a new Invasive Species Strategy needs to be developed as there have been two iterations of the strategy - one in 2013⁷³ and then a revised one in 2018 which was produced⁷⁴, alongside a Progress Report in 2017⁷⁵. This action has been amended to reflect this, and should include the recommendation for DAERA Marine and Fisheries Division to develop a “*Marine Biosecurity Planning Guide for Northern Ireland*” (under 1.4 of Page 5 of the Progress Report 2017) to ensure compliance under the Wildlife (Northern Ireland) Order 1985, however this has yet to be fully developed - with many marine licences requesting copies of biosecurity plans to be submitted to the Marine Wildlife DAERA email 4 weeks prior to work commencing⁷⁶. Marine license advice directs applicants to guidance which is in place by the GB Non-Native Species Secretariat (NNSS)⁷⁷. It will be important to carry out a “failure analysis” from the 2017 progress report to see what recommendations or actions have not yet been implemented and if this is the case, assess what the barriers have been in implementation. NIMTF would also like to ensure that this specific action sits underneath the proposal to establish an All-Island Initiative.

NIMTF welcomes an All-Island basis as divergence in terms of management of invasive species can lead to an undermining of efforts in one area when compared to another. NIMTF has highlighted that work for addressing invasive species already exists for NI, although it has limitations in the case of Strangford Lough at the outset this does not apply to islands within Strangford Lough, and could also pose an issue for islands in other sea loughs around Northern Ireland. NIMTF would again question why we are reinventing the wheel when a Shared Island Invasive Species and Biosecurity Initiative already exists, complete with €1.3 million funding to 2029 aimed at strengthening cross-border co-operation to manage invasive species⁷⁸. When linking to the work being done on a Shared Island basis, need to ensure that the current changes in EU regulation around chemical control has been taken into account to ensure best practice is being used. This will require the implementation of a prioritisation exercise to assess where the short, medium and long-term efforts can be placed. It is important that this stakeholder forum is accessible to a diverse set of stakeholders as everyone, including society through the Check, Clean, Dry⁷⁹ process have a role to play. To ensure that citizen science has a complete role to play under the Shared Island project, it is important to further develop local action, which requires greater awareness - e.g. the role of councils and how this will be

developed further. Clear frameworks for councils have not been specifically provided to enable effective action, or to drive momentum forward and should be done in conjunction with the relevant Educational Departments for NI and ROI.

NIMTF would be keen to engage with this process, alongside the Freshwater Task Force (FWTF)⁸⁰ on a source-to-sea approach, but also in conjunction with transboundary areas. Greater work should be done here in conjunction with Citizen Science in empowering society to support data collection and identification of non-native invasive species to have early monitoring and detection. For further information, please see the response provided by the FWTF. For further information on the FWTF, please contact Bróna McNeill on brona@nienvironmentlink.org.

As highlighted under SO1 however, there needs to be a feedback loop and failure analysis implemented into developed Management Plans to ensure that we are robustly assessing where efforts have failed, or need to be amended to ensure true effectiveness. This should be done in conjunction to the implementation of a Risk Register, but this will be more relevant to the next proposal.

NIMTF has concerns with some of the language that is used within this action; namely the use of 'Widely Spread' and how this indicator has been calculated and what metrics are associated; and then from the 2015 baseline. This does not account for non-native invasive species which established after 2015, which provides the implication and indication that those species are here to remain regardless of whether they are having a negative impact on the surrounding environment or not. NIMTF would propose the following be implemented:

- Reporting cycles continue to be every 6 years, but with mid-way assessments to allow for course corrections
- The baseline should utilise the most available information and set it from a more recent baseline - e.g. 2017 or 2023 to coincide with the most recent progress report on invasive species.
- Each subsequent reporting cycle should update the baseline which is being worked to, to provide a needs assessment based on associated progress.
- New arrivals of invasive species should be removed, rather than monitored
- Move to a focus on prevention of the spread, or establishment of species to begin with, whilst addressing the reduction of already established species.
- 50% reduction needs to be carefully monitored and managed to ensure there are no wider issues or ramifications.
- Outline the metrics for non-native invasive species being classed as 'Widely Spread'. The following metrics exist under the UK Marine Strategy for 'Non-Indigenous Species' which has not met GES (See Annex 1)

Actions 3.8 and 3.9

It is important that a robust assessment of need is directly tied to place-based assessments, ensuring that all recommendations are strongly tied back to the objectives and commitments under the Climate Change (NI) Act 2022, which we have highlighted within our response to the Climate Action

Plan 2023 - 2027⁸¹, the NI 3rd Climate Change Adaptation Programme⁸², Review of Environmental Governance in NI²⁹, Establishment of a Just Transition Commission⁸³, OEP's Call for Evidence on Drivers and Pressures Affecting the UK Marine Environment²⁸. It will also be important that these action points are linked to Actions 3.11 and 3.12 on Fisheries Management Plans (FMPs).

Given that the climate crisis and the biodiversity crisis are intertwined and the acknowledgement that only 4 out of 18 marine and coastal habitats in NI are in Favourable conservation status (Habitat Regulations Assessment Overview, 2026)³ shows that further work is needed to ensure that the marine environment and connected species and habitats are climate-resilient and we act now to reduce the growing pressure coming from this large-scale impact.

Action 3.10

NIMTF wishes to reiterate that any biodiversity net gain approach needs to consider the role that the marine environment can play within the planning system. NIMTF has given evidence in terms of the wider impacts that nature-based solutions can provide in terms of blue carbon for the Climate Action Plans (CAPs), such as native oysters - being delivered by Ulster Wildlife^{84,85,86,87,88}, saltmarsh - being delivered by WWT^{89,90} and our coastlines and intertidal areas - being delivered by National Trust^{91,92}, but also in line with the FWTF in terms of their contribution to addressing water quality issues as part of the Sustainable Urban Drainage Systems Management Train Approach from new and existing housing developments moving forwards, which we jointly responded⁹³ to as part of the development of the Water, Sustainable Drainage and Flood Management Bill⁹⁴.

The Chartered Institute of Ecologists and Environmental Managers (CIEEM) has produced a briefing on environmental enhancement (instead of referring to it as biodiversity net gain)⁹⁵. The language needs to be stronger here to ensure that this also includes implementation and to ensure that this links to the Strategic Planning Policy Statement and for each Local Development Plans for each area. As highlighted under SO1, NIMTF would like to see any approach incorporating existing networks and data through the Nature Recovery Networks and associated partnerships.

Action 3.11 and 3.12

NIMTF is pleased to see acknowledgement that the FMPs have their timelines amended following the consultation on the Amendments to Annex A of the Joint Fisheries Statement (JFS), which NIMTF responded to⁹⁶. NIMTF has concerns around the FMP process, which we have outlined in previous responses about ambition and how effective these will be monitored and enforced given existing challenges demonstrated and highlighted by DAERA Marine & Fisheries Division. These FMPs also need to ensure alignment with the UK Marine Strategy in terms of "Bycatch" metrics and the "Commercial Fisheries" indicator under Annex 1.

Whilst NIMTF welcomes this approach to FMPs, given that within the JFS they must follow an 'ecosystem-based approach', there are other objectives within the JFS which must be considered too - such as the socio-economic, climate change and sustainability. NIMTF would like to see that to coincide with the holistic approach of FMPs, that this be amended to reflect this. NIMTF would also like to see something within this objective reflecting the importance of running parallel objectives

such as bycatch mitigation action plans for seabirds, elasmobranchs and cetaceans with their relevant strategies - Seabird Conservation Strategy and Action Plan³⁶, Elasmobranch Conservation Strategy³⁵ and the UK Cetacean Strategy⁹⁷. NIMTF and the FWTF would also like to ensure that the impacts to freshwater fishing is also included, as well as impacts to each water body and flow-route.

New Proposals: Marine Spatial Planning

It is important to ensure that as we identify pressures affecting biodiversity, specifically to Northern Ireland, that we use the available information to us, including conservation objectives, condition assessments and how the data is collected for these areas. By doing so, NI can incorporate adaptive management - e.g. Belfast Lough Outer Lough highlights a mismanagement in measures to protect *Ocean Quahog* from anchorage pressures; whilst declines in a variety of Tern species are being seen across Northern Ireland; whilst the Offshore MPA sites such as Queenie’s Corner, Pisces Reef Complex and South Rigg are still developing their management plans to be completed by 2027. This should be done in conjunction with the finalisation of the NI Marine Plan⁴³ to sustainably plan activities within the marine environment for activities including offshore renewable energy development, fishing and tourism sectors.

Inclusion and development of an Underwater Noise Action Plan by 2028 which is in the EIP which utilise all available indicators for assessing sustainable developments across NI seas. According to the OEP⁹⁸, if the coherence of the long-term monitoring framework is established and is coherent to English, Welsh and Scottish waters this could mean underwater noise from the industry is managed at the UK-wide level (DAERA, 2024).

SO4: Mobilise Funding, Governance, Skills and Evidence to enable Delivery

Nature recovery requires long-term investment, strong governance, skilled people and high quality evidence. SO4 consolidates all enabling mechanisms into a single delivery architecture. It covers funding & finance and data & research. SO4 should ensure that Northern Ireland has the financial, institutional and technical foundations required to deliver nature recovery to 2030, 2040 and 2050. It also should ensure that data, monitoring and research are integrated into decision making, enabling adaptive management and transparent reporting.

Action Table 5 - SO4: Mobilise Funding, Governance, Skills and Evidence to enable Delivery

<u>Action No.</u>	<u>Original Action</u>	<u>Changes</u>	<u>Updated Action</u>	<u>Delivery Date (End of)</u>	<u>Indicator</u>
Funding & Finance					
4.1	Launch the successor to the Environment Fund to distribute funding to nature recovery and connecting people to	No change	Launch the successor to the Environment Fund to distribute funding to nature recovery and	2027	Successor Environment Fund launched by 2028 with funding rounds supporting strategic nature recovery and

	nature projects from 2028.		connecting people to nature projects from 2028.		people-nature connection projects.
4.2	Develop funding mechanisms to support stakeholder action to meet the 'nature positive' by 2030 objective including partnership and Green Finance solutions for nature recovery and nature-based solutions. (EIP)	Reconsider; the interlinkage and co-dependency of these needs to be clarified.		2026	Funding mechanisms for nature recovery and NbS designed and published by 2027, including partnership and Green Finance options. Pilot Green Finance initiatives launched, with annual reporting on investment leveraged.
4.3	Develop a Biodiversity Finance Plan to provide a strategic overview of government and private finance nature-related spending and to increase the amount of money available for nature restoration.			2027	Year-on-year increase in external and partnership funding mobilised for nature recovery.
4.4	Develop a framework and a set of standards that will enable high integrity environmental markets and develop partnerships to secure private sector financing for nature restoration.			2028	Clear pipeline of nature-positive projects established, eligible for new funding mechanisms. Monitoring and reporting framework in place, tracking financial flows and environmental outcomes.
		New	Launch the successor to the Marine, Environment and Fisheries Fund to be continuously multi-year to distribute funding to blue carbon, marine nature	2028	Successor Marine Environment and Fisheries Fund launched by 2028 with funding rounds supporting strategic nature recovery and people-nature connection projects.

			recovery and enhance sustainable fisheries.		
		New	Develop and strengthen collaborative cross-border funds such as Shared Island Funding and Peace PLUS to ensure greater collaboration with neighbouring jurisdictions.	2030	An increase in the number and value of cross-border nature recovery projects funded through Shared Island Funding, Peace PLUS or similar programmes by 2030.
Enabling Data & Research					
4.5	Publish a protected site monitoring framework and associated condition assessments, reporting annually on the condition of protected sites.	No change	Publish a protected site monitoring framework and associated condition assessments, reporting annually on the condition of protected sites.	2027	Report agreed with stakeholders involved, with formal stakeholder review confirming the added value of the action.
4.8	Publish the first Living Map of Northern Ireland by 2024 (habitat/land cover model) (EIP)	No change	Publish the first Living Map of Northern Ireland by 2024 (habitat/land cover model) (EIP)	2026	Report agreed with stakeholders involved, with formal stakeholder review confirming the added value of the action.
4.10	Enhance our evidence on the extent, condition, functioning and connectivity of NI ecosystems, using a range of earth observation, survey methodologies and land cover assessments. (EIP)	No change	Enhance our evidence on the extent, condition, functioning and connectivity of NI ecosystems, using a range of earth observation, survey methodologies and land cover assessments. (EIP)	2026	Report agreed with stakeholders involved, with formal stakeholder review confirming the added value of the action.

4.11	Commission high quality research on biodiversity to assist in the implementation of this strategy.	Revised	Commission high quality research on biodiversity, including long term nature trends, ecosystem services, and the societal benefits of nature, to support effective implementation of this strategy.	2026	Biodiversity research programme commissioned and delivered, addressing priority evidence gaps.
4.12	Provided £8m of funding to the Climate + Water + Biodiversity Co-centre to deliver high quality research on climate, biodiversity and water recognising the intrinsic link between all three.	Revised	Support regional cross cutting research on climate, biodiversity and water, recognizing the intrinsic links between them, including through strategic investment in research partnerships.	2029	Support for the initiatives such as the Co-Centre maintained and annual cross-disciplinary research outputs published and used to inform policy and delivery.

Funding

NIMTF have noticed in particular that there is no acknowledgement within the wording of these SOs of resourcing of action/commitment at a time particularly when resources are limited across the NI Executive. At present, there is a proposed Draft Budget for 2026-2029/30⁹⁹ which is the first multi-year budget for the past decade. NIMTF have provided a response to this¹⁰⁰.

In Scotland, the Nature Restoration Fund has been established, committing £62 million towards commitment to the delivery of actions¹⁰¹, however there has been no backing of resources in NI to support further ambition when compared to Scotland's contributions to nature recovery. This could be achieved by providing ring-fenced, core support towards dedicated, particular areas of known need for nature recovery such as MPA Management Plans, addressing water quality issues, biosecurity and achieving our 30by30 goals and objectives to name a few. As it currently stands, the perspective is that there is minimal to no commitment and no budget available to push things further.

For NI, there is mention of the Environment Fund 2023 - 2028³⁷, which is currently the only guaranteed multi-year fund, however this does not take into consideration additional, external funding strands such as Marine Biodiversity Net Gain, Shared Island Funding¹⁰² or PeacePLUS projects³⁹. By proportioning allocated, ring-fenced funding to the delivery of actions, this solidifies commitments to achieving actions to demonstrate intention. All acknowledged funding models only

provide coverage up to 2029, with DAERA-specific funding highlighted up to 2028 which has already been accounted for under the Environment Fund. NIMTF would like the document to mention aspects around a blended funding model which comprises both public and private investment into nature recovery, channeled through securing core funding for DAERA.

Action 4.1

This action needs to be carried out in conjunction with the Department of Finance (DoF) to ensure that nature's recovery is fully resourced to support the practical delivery which will lead to nature recovery projects. Funds need to be long-term, multi-year and assess the limitations of each fund to improve for future iterations. See the relevant actions associated with funding successors to the associated marine environmental funds.

Action 4.3

There are strong links from this action to the requirement of environmental funds (see above section on **Funding**). This will be tied to the investments of high integrity marine natural capital to ensure a mix of private and public investment to ensure that projects can continue even if the NI Executive was to collapse again in the future. This will link in particular with Action 4.4 but also to aspects of SO5, in particular Actions 5.3 and 5.4.

Action 4.4

'High Integrity Marine Natural Capital Markets in the UK - A Roadmap for Action'¹⁰³ work being done, funded by Crown Estate and Blue Marine Foundation should be a starting block to see if work can be linked in with, or used as a foundation moving forward for future developments. It will be important to link this with the ongoing work for the NI Marine Natural Capital Report (2023)¹⁰⁴.

Action 4.8

It would be beneficial to see the work of AFBI mapping the whole of seabed¹⁰⁵ to ensure that the marine components of this can be included too as part of the Living Map of Northern Ireland for the marine.

Enabling Data and Research - Monitoring Frameworks

The following actions have a key role to play in developing or contributing to the available funds which support nature recovery plans and programmes. NIMTF welcomes this as it links with the existing EIP target discussing achieving at least 95% of features within ASSIs being in, or approaching favourable conservation. This may also better serve in SO5 as it relates more to monitoring. It will be critical to ensure that this monitoring framework has a built-in feedback mechanism with an adequate timeline to ensure that if monitoring is not successful then it can be adapted to address challenges as they appear, without affecting or disrupting reporting cycles.

Action: DAERA to integrate this as part of the proposed actions, but ensure this is set before the first existing target. Integrate with SO5.

Action: DAERA to assess indicators where data is ‘Uncertain’ to address or provide further detail to how it can contribute to developing this indicator at the UK level.

Action: DAERA to work with other devolved nations on the development of indicators which are not truly taking account of available data such as ‘Seabirds’.

Action 4.10

This action needs to discuss MPA Management Plans and associated condition assessments/vulnerability assessments similar to what is happening with land cover assessments. See previous links to SO2.

Action 4.11

This action needs to ensure a targeted approach to addressing knowledge and data gaps given within the Habitat Regulations Assessment Overview Report (2026) which highlights in the Annex 1 the summary of marine and coastal habitats where data is deficient and knowledge gaps must be addressed.

SO5: Nature Valued & Mainstreamed Across Society and the Economy

Nature recovery cannot be delivered by the government alone. It requires widespread public engagement, behavioural change, business leadership and integration of biodiversity into economic and social decision making. Objective 5 strengthens communication, education, business engagement and natural capital literacy across society.

This objective ensures that behavioural science informs communication, that businesses are supported to adopt biodiversity positive practices, and that natural capital frameworks become embedded across government. It also strengthens DAERA’s contribution to the Circular Economy Strategy, ensuring that resource use is reduced and environmental priorities are embedded.

Action Table 6 - SO5: Nature Valued & Mainstreamed Across Society and the Economy

<u>Action No.</u>	<u>Original Action</u>	<u>Changes</u>	<u>Updated Action</u>	<u>Delivery Date (End of)</u>	<u>Indicator</u>
5.1	Commission the development and roll-out of a Communications Plan to support	Revised	Commission and codesign, with key stakeholders, a behaviour-change driven	2026	Behavioural research completed; stakeholder codesign

	the necessary behaviour change and mainstream biodiversity across society.		Communications and Engagement Plan, underpinned by behavioural science and informed by targeted research, to drive societal mainstreaming of biodiversity, and implement the plan on a feasible timeline		delivered; plan developed and approved; rollout commenced; early evaluation shows increased awareness and behavioural shifts.
5.2	Encourage Businesses in Northern Ireland to undertake a Business and Biodiversity Charter Mark.	Revised	Promote and enable businesses in Northern Ireland to adopt biodiversity positive practices through guidance, tools, and recognition mechanisms that encourage continuous improvement. – eg the BITC Biodiversity Charter mark	2026	Guidance and tools published; businesses supported annually; voluntary recognition mechanism implemented; stakeholder codesign completed; annual reporting shows increased uptake and measurable improvements.
5.3	Scope and develop a robust Natural capital and ecosystem assessment framework for NI for government departments and public bodies, etc. (EIP)	No change	Scope and develop a robust Natural capital and ecosystem assessment framework for NI for government departments and public bodies, etc. (EIP)	2028	Natural capital and ecosystem assessment framework developed, tested and published for use across government and public bodies.
5.4	Enhance our natural capital reporting, data and habitat mapping systems to make natural capital and ecosystem datasets more readily available	No change	Enhance our natural capital reporting, data and habitat mapping systems to make natural capital and ecosystem datasets more readily available	2028	Integrated natural capital reporting and habitat-mapping platform established, improving access to natural capital and ecosystem datasets.

	and integrate into natural capital accounting and reporting systems (natural capital and ecosystems assessment platform). (EIP)		and integrate into natural capital accounting and reporting systems (natural capital and ecosystems assessment platform). (EIP)		
5.5	Continue to work with the Department for Economy on their draft Circular Economy Strategy to reduce waste, maintain the value of products and materials for as long as possible and reduce the use of the earth's resources. (EIP)	No change	Continue to work with the Department for Economy on their draft Circular Economy Strategy to reduce waste, maintain the value of products and materials for as long as possible and reduce the use of the earth's resources. (EIP)	2028	DAERA inputs delivered to the Circular Economy Strategy with environmental priorities embedded and joint progress reporting in place.
		NEW	Strengthen cross-departmental engagement by ensuring nature, biodiversity and environmental wellbeing are routinely considered within the work programmes of the Health, Education and Communities Committees of the NI Assembly.	2030	An increase in the number of agenda items being discussed at Committees for Health, Education and Communities in the NI Assembly
		NEW	Develop and implement a robust framework for citizen science projects to be developed to contribute to evidence gaps which can be supported through Departments for	2030	By 2030, a fully operational citizen science framework is in place, with active projects contributing data to identified evidence gaps and annual reporting on participation and data quality.

			Education and Communities.		
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Action 5.1

Important that this is linked to all parts of the NI Executive as proposed within SO5 - including Communities, Education and Health to ensure full agreement and commitment to behavioural changes. Work is currently ongoing through the Irish Ocean Literacy Network¹⁰⁶ on an all-island basis, but further work needs to be done here.

NIMTF thanks DAERA for the opportunity to respond to the draft NRS and wishes to ensure that this strategy fully supports the implementation of healthy, productive and resilient seas for Northern Ireland, whilst connecting it to the terrestrial counterparts to ensure that a source-to-sea approach has been taken. By implementing the above actions as outlined to improve the current draft NRS, we can ensure that across Northern Ireland that nature's recovery gets back on track and is able to be effective.

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

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Annex 1: UK Marine Strategy Indicators for the Nature Recovery Strategy to align with

Benthic Habitats		
Criteria	2024 - 2030 GES Targets	OSPAR QSR 2023 Indicator
Spatial extent of habitat loss	The extent of loss of a seabed habitat type caused by human activities is minimised and where possible reversed (should not exceed a set of agreed indicator thresholds)	<ul style="list-style-type: none"> ● Potential physical loss of predicted biogenic habitats ● Changes in extent and condition of kelp habitats communities (to be developed)
Extent of physical loss	Habitat loss of sensitive or fragile important habitats caused by human activities is prevented, and where feasible reversed (should not exceed a set of agreed indicator thresholds)	Area of habitat loss
Spatial extent of habitat type adversely affected by physical disturbance	The extent of habitat types adversely affected by physical disturbance caused by human activity should be minimised (should not exceed a set of agreed indicator thresholds)	<ul style="list-style-type: none"> ● Extent of physical disturbance to benthic habitats: fisheries with bottom-contacting gears ● Extent of physical disturbance to benthic habitats: aggregate extraction ● Extent of physical disturbance to benthic habitats: offshore structures and other activities (to be developed)
Extent of Adverse Effects on the condition of benthic habitats	The extent of adverse effects caused by human activities on the condition, function and ecosystem processes of habitats is prevented, and where feasible reversed (should not exceed a set of agreed indicator thresholds).	<ul style="list-style-type: none"> ● Condition of Intertidal Seagrass Communities in Coastal Waters ● Condition of Intertidal Saltmarsh Communities in Coastal Waters ● Condition of Soft Sediment Invertebrate Communities in Coastal Waters (Infaunal Quality Index) ● Condition of Intertidal Rocky Shore

		<p>Macroalgae (seaweed) Communities in Coastal Waters</p> <ul style="list-style-type: none"> ● Condition of Intertidal Sediments in Coastal Waters Based on Opportunistic Macroalgae Growth ● Condition of Benthic Habitat Communities based on the 'Relative Margalef' Diversity Index ● Intertidal Community Temperature Index ● Sentinels of the Seabed ● Changes to the Condition of Biogenic Reefs (to be developed) ● Condition of Sublittoral Rock Habitats (to be developed)
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Pelagic Habitats		
Criteria	2024 - 2030 GES Targets	OSPAR QSR 2023 Common Indicator
Habitat distribution and condition	The structure, function, composition, and abundance of the plankton community is not significantly adversely influenced by anthropogenic drivers	<ul style="list-style-type: none"> ● Changes in Phytoplankton and Zooplankton communities ● Change in plankton biomass and abundance
Eutrophication		
Criteria	2024 - 2030 GES Targets	Indicator
Nutrient Concentrations	Nutrient concentrations are below the levels which could lead to harmful eutrophication effects	Nutrients

Nutrient ratios	Nutrient ratios are below levels which could harm the plankton community.	Nutrients
Nitrogen and Phosphorus loads	Total Nitrogen (TN) and Total Phosphorus (TP) Loads (where measured) do not exceed the modelled pre-eutrophic conditions with appropriate variability added to the threshold.	Nutrients
Chlorophyll-a concentrations	Chlorophyll-a concentrations are below levels which could lead to harmful eutrophication effects	Phytoplankton (a multi-metric of chlorophyll-a and plankton abundance)
Dissolved Oxygen content	Dissolved oxygen content in coastal waters is above levels which could lead to harmful eutrophication effects	Dissolved oxygen
Measures of plankton community/change	Demonstrate an acceptable balance of plankton communities that will support ecological functioning, carbon uptake and food web dynamics.	Biodiversity and Eutrophication
Contaminants		
Criteria	2024 - 2030 GES Targets	Indicator
Concentrations of contaminants in coastal and territorial waters	Concentrations of substances identified within relevant legislation, and international obligations are below the concentrations at which adverse environmental effects are likely to occur.	<ul style="list-style-type: none"> ● Metals in biota and sediment ● Polychlorinated biphenyls (PCB) in biota and sediment ● Polycyclic aromatic hydrocarbons (PAH) in biota and sediment ● Polybrominated diphenyl ethers (PDBE) in biota and sediment ● Inputs of metals from water and air

		<ul style="list-style-type: none"> ● Radionuclides ● Chemical status in water - wider chemicals ● PCBs in marine mammals ● Per- and polyfluoroalkyl substances (PFAS) in sediment and biota
Health of species and condition of habitats	The intensity of those biological or ecological effects due to contaminants agreed by OSPAR, as appropriate for UK Marine Strategy Part One purposes, are below the toxicologically based standards.	<ul style="list-style-type: none"> ● The External Fish Disease Index ● 7-ethoxyresorufin O-deethylation (EROD) activity ● Micronucleus test ● Liver neoplasm ● Imposex in dogwhelks ● AChE inhibition
Impact and occurrence of significant acute pollution events on species and habitats	Occurrence and extent of significant acute pollution events, and their impact on biota affected by this pollution, should be minimised through appropriate risk-based approaches.	The number of spills including oil spills.

Input of Anthropogenic Sound		
Criteria	2024 - 2030 GES Targets	Indicator
Impulsive noise	Levels of anthropogenic impulsive sound sources are not increasing and do not exceed levels that adversely affect populations of marine animals.	Records of spatial and temporal data on impulsive sound
Continuous sound	Levels of anthropogenic continuous low-frequency sound are not increasing and do not exceed levels that adversely affect populations of marine animals.	Records of ambient “continuous” noise

Marine Mammals and Seals (Grouped metrics)		
Criteria	2024 - 2030 GES Targets	OSPAR Quality Status Report 2023 Common Indicator
Bycatch Mortality	The long-term viability of marine mammal and seal populations is not threatened by bycatch and the trend in bycatch estimates is decreasing	Marine mammal bycatch
Population abundance and distribution	Abundance and distribution trends are stable where good status is established or improving where species or populations are not achieving GES.	<ul style="list-style-type: none"> • Changes in abundance and distribution of seals • Abundance and distribution of bottlenose dolphins
Grey seal pup production	Grey seal pup production remains stable where good status is established or improves where populations are not achieving GES.	Grey seal pup production
Marine Birds		
Criteria	2024 - 2030 GES Targets	Indicator
Bycatch Mortality	The long-term viability of marine bird populations is not threatened by deaths caused by incidental bycatch in mobile and static fishing gear	Seabird bycatch - B5
Population abundance and distribution	The population size of marine bird species has not declined substantially since 1992 as a result of human activities.	Marine bird abundance - OSPAR
Population demographic characteristics	Widespread lack of breeding success in marine birds caused by human activities should occur in	<ul style="list-style-type: none"> • Marine bird productivity - OSPAR • Kittiwake breeding success

	no more than three years in six.	<ul style="list-style-type: none"> ● Invasive mammal presence on island seabird colonies
Distributional range	There is no significant change or reduction in population distribution of marine birds caused by human activities	Distribution of breeding and non-breeding marine birds
Fish		
Criteria	2024 - 2030 GES Targets	Indicators
Population abundance	Sensitive species are not decreasing due to anthropogenic activities and long-term viability is ensured	<ul style="list-style-type: none"> ● Recovery of Sensitive Fish Species deemed sensitive to fishing pressures ● Size Composition in Fish Communities ● Proportion of Large Fish (Large Fish Index) ● Pilot Assessment of Feeding Guilds ● Pilot Assessment of Mean Maximum Length of Fish
Bycatch Mortality	Incidental bycatch is below levels which threaten long-term viability and recovery of fish populations (to be developed)	Bycatch Mortality (to be developed)
Contaminants in Seafood		
Criteria	2024 - 2030 GES Targets	Indicators
Contaminant concentrations in seafood	For contaminants where regulatory levels have been set, there should be a high rate of compliance with conventions based on relevant surveys and including samples originating from commercial fishing grounds in the Greater North Sea and Celtic Seas.	<ul style="list-style-type: none"> ● Contaminant concentrations in seafood: ● Heavy metals (Cadmium, Lead, Mercury) ● Polycyclic aromatic hydrocarbons (PAHs) ● Dioxins and dioxin-like Polychlorinated biphenyls (PCBs)

Commercial Fish		
Criteria	2024 - 2030 GES Targets	Descriptor
Populations of commercially exploited fish and shellfish are within safe biological limits	Increase the proportion of commercially exploited marine fish and shellfish of UK interest that are within safe biological limits, meeting both indicators' criteria: fished at or below maximum sustainable yield and have a biomass capable of producing maximum sustainable yield	Integrate two indicators: Fishing pressure and Reproductive capacity
Fishing pressure of stocks being within safe biological limits	Increase the proportion of fishing mortality rates of commercially exploited marine fish and shellfish stocks of UK interest being at or below levels which can produce maximum sustainable yield.	Fishing pressure
Reproductive capacity of stocks being within safe biological limits	Increase the proportion of spawning stock biomass of commercially exploited marine fish and shellfish stocks of UK interest being at or above biomass levels capable of producing the maximum sustainable yield	Reproductive capacity

Non-Indigenous Species (NIS)		
Criteria	2024 - 2030 GES Targets	OSPAR Quality Status Report 2023 Indicator
Newly introduced NIS	The number of newly introduced NIS, as a result of human activities, is minimised and where possible reduced to zero.	The number of records of newly introduced NIS

The spread of established invasive NIS	The rate of spread of established invasive NIS, as a result of human activities is minimised and reduced where possible	The number of populations of established invasive NIS
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Marine Litter

Criteria	2024 - 2030 GES Targets	Indicator
Beach Litter	A decrease in the total amount of the most common categories of litter found on surveyed beaches.	Abundance, Composition and Trends of Beach Litter.
Seafloor Litter	A decreasing trend in the probability that litter is collected from the seafloor during surveys.	Seafloor litter surveys using benthic trawls.
Floating Litter	A downward trend in the number of northern fulmars with more than 0.1g of plastic particles in their stomach.	Floating litter (by proxy, measuring plastic particles in fulmar stomachs).

Food Webs

Criteria	2024 - 2030 GES Targets	Indicator
Trophic guild diversity	The species composition and relative abundance of representative feeding guilds are indicative of a healthy marine food web.	Pilot Assessment of Feeding Guilds
Trophic guild balance	The balance of abundance between representative feeding guilds is indicative of a healthy food web.	<ul style="list-style-type: none"> ● Pilot Assessment of Feeding Guilds ● Pilot Assessment of Ecological Network Analysis Indices
Size distribution	The size structure of fish communities is indicative of a healthy marine food web.	<ul style="list-style-type: none"> ● Size Composition in Fish Communities ● Pilot Assessment of Mean Maximum

		<p>Length of Fish</p> <ul style="list-style-type: none"> ● Proportion of Large Fish (Large Fish Index)
Productivity	Productivity of each of the representative feeding guilds, characterised by key species, is indicative of a healthy marine food web.	<ul style="list-style-type: none"> ● Concentrations of Chlorophyll-a ● Changes in Phytoplankton and Zooplankton Communities
Changes in Hydrographical Conditions		
Criteria	2024 - 2030 GES Target	Indicators
Permanent alteration of hydrographical conditions	All significant marine infrastructure developments must meet licensing conditions to ensure they do not adversely affect the marine ecosystem.	Whilst this descriptor does not have specific indicators at present, a number of indicators, such as sea surface temperature, salinity, turbidity, species and habitat condition are available to assess the likely impacts of infrastructure developments.