



a million
voices for
nature

RSPB response to the Environment Committee consultation – Dec 2011

Draft Programme for Government 2011-2015

The RSPB has been working in Northern Ireland for over 40 years and is a champion of the wildlife and natural places here. Locally, the charity is supported by a growing membership of over 13,000 members (we have over 1 million members across the UK). A team of dedicated staff is employed to understand the threats facing our wildlife, manage our stunning nature reserves, and give our children hands-on experience of our natural world. Through our policy and advocacy work, we also act to influence others who have the ability and power to protect and enhance the living world for future generations.

In Northern Ireland, the RSPB spends at least £1.5 million a year on the global target to halt biodiversity loss, an objective shared with the Executive. We receive only around £170k per annum from central government, raising the rest of the money from our supporters and other grant-making bodies, most of which can only fund charitable bodies like the RSPB. The RSPB uses around 90% of its income on front-line nature conservation with the rest covering income generation and administration.

Over 270 RSPB volunteers provide over 20,000 hours of time to nature conservation work in Northern Ireland. This amounts to around £250k of full-time salary equivalent delivery of environmental work.

Introduction

We would like to thank the Environment Committee for this opportunity to submit some initial thoughts and recommendations on the Draft Programme for Government 2011-2015. The RSPB would be happy to further elaborate on this paper if necessary, at the 'Engagement Event' on the 12th January 2012.

After a substantial delay in the Draft PfG being published, we are pleased to be able to comment on this consultation document. However, the RSPB is disappointed that the Draft PfG is another missed opportunity by the Executive, to grasp the importance and potential of our natural environment.

From the summer of 2011 onwards, the RSPB met with some of the parties both formally and informally, to present our recommendations for the Draft PfG. This short recommendation paper put forward 9 main areas of work, which we believe need to be embraced collectively by Government. These include: **Supporting sustainable communities and a healthy**

environment, safeguarding our sea life, ending climate chaos, learning for sustainability and 'Futurescapes'. This short bullet pointed document is attached, for the attention of the Committee and encapsulates the RSPB's key PfG points and recommendations.

Perceived gaps in the draft programme

The most obvious general observation is that the draft PfG is light on key commitments for the natural environment. This raises the question as to whether the document is a solely economic strategy, with environmental considerations tacked on at the end. Another general area of concern is that the draft PfG is based on many pre-existing targets and commitments, and therefore lacks medium to long term ambition and imagination.

We believe that that the PfG lacks an overall vision. Earlier this year, we joined with other environmental NGOs and a number of academics, to write an open letter to the Assembly, which appeared in the *Belfast Telegraph* newspaper. Our aim was to put forward a positive and progressive agenda for the PfG, with a series of policy challenges to the Executive. These were:

- We are no longer 99% reliant on increasingly expensive imported energy, our energy supply is secure, and we have a thriving renewable energy sector supporting thousands of new jobs and attracting major investment;
- Our economy is competitive and low-carbon, with innovative solutions to social and technological issues;
- New laws and annual targets ensure carbon emissions are reduced by 80% from 1990 levels by 2050;
- Resilient and healthy landscapes and seas are valued as underpinning our quality of life and economy through a new vision for agriculture, land use and planning in our seas;
- Food security is addressed, with more local food being produced, and our land and seas are managed to provide multiple public services;
- The degradation of our ecosystems is halted, and damaged and lost biodiversity is restored with the Northern Ireland Biodiversity Strategy strengthened to achieve this;
- An independent champion for sustainability and environmental protection is in place (an independent environmental protection agency) preventing costly indecision and slow action on safeguarding our environment which leaves Northern Ireland taxpayers repeatedly exposed to the risk of enormous fines for breach of EU environmental law;

- A range of protected areas at sea is introduced, and simplified coordination of marine activities for all sea users through a Marine Management Organisation;
- A modern planning system (by 2016) is created that delivers a thriving economy whilst protecting our natural, built and cultural heritage providing thousands of affordable homes on brownfield sites with a new vision of towns and cities, designing them with the future in mind. All development will be truly sustainable and of a quality that promote longer-term societal benefits, and deliver improved health and wellbeing for their residents; and
- A modernised and integrated transport system is developed, providing improved railway lines, more cycle tracks and priority bus lanes.

We would urge the Executive to embrace these policies and show the vision that is now needed to deliver the changes required for the long-term benefit of Northern Ireland.

One other general observation is that the draft PfG talks about ‘working more effectively across Government Departments’. This is something which the RSPB would welcome, but our practical experience is that Government Departments continue to be ‘silos’, to the detriment of progress on very many issues including around a Marine Bill and the Strangford Horse Mussels issue, to name a few. **We believe that ‘joined up’ government is required if we are to effectively tackle many of the problems which our natural environment face.**

Whilst there are some good things contained within the PfG, such as an Invasive Species Strategy, revision of the Conservation Regulations and a revised Northern Ireland Biodiversity Strategy (this was one of the RSPB’s main recommendations in our attached document), the document fails to put in place measures to help us deliver these strategies.

Other gaps/concerns/queries include:

- On page 7 of the draft PfG, it states: *“ensure 90% of large scale investment planning decisions are made within 6 months and applications with job creation potential are given **additional weight** (our emphasis)”*. This sounds remarkably similar to the shelved PPS24 and **we would have serious concerns regarding the implications of this proposal for the natural environment and biodiversity.**
- Page 8 – ‘Agree any changes to post-2015 structures of Government in 2012’ – **We believe that that this should include the creation of an independent Environmental Protection Agency.**
- We believe that the Executive has missed the opportunity to promote **environmental education** - in order to bring children closer to nature. In particular, we believe that Government should establish annual targets for the provision of quality out-of-

classroom learning in the natural environment for every pupil by 2015 and include monitoring as part of formal school inspections. In addition, such experiences with nature can provide many other benefits including physical and mental well-being, tackle obesity and provide a new generation of 'environmentally aware' young people.

The current 'Schools for the Future: A policy for Sustainable Schools' is referenced on page 51 as a building block of 'Delivering High Quality and Efficient Public Services'. **However we believe that the remit of this policy is too narrow and does not adequately address issues around sustainability in the context of environmental considerations.**

- The **Sustainable Development Strategy** is mentioned in a number of places throughout the Draft PfG (Pages 29-41). **The RSPB believes that sustainable development should be the over-arching principle within PfG, underpinning all policies and processes.**

We would like to know more about the current status of the Sustainable Development Strategy, funding and expected progress on this issue.

- Whilst we welcome the Biodiversity Strategy and its revision by 2012/13 (Page 41 – 'Building Block'), **we ask that actions in the Biodiversity Strategy must be designed to halt biodiversity loss by 2016 and restore biodiversity by 2020, and that adequate resourcing is put in place to meet these targets.**
- *"Encourage industry to achieve 20% of electricity consumption from renewable electricity and 4% renewable heat by 2015"* (Page 7) – We are pleased to see this included, but **would question levels of ambition, given that the UK target is 40% by 2020. In addition, the RSPB is in favour of renewable energy – but we want to ensure that renewables are built in the right places.**
- Page 29 – Building blocks for 'Growing a Sustainable Economy and Investing in the Future' include the Regional Development Strategy (RDS), the Regional Transportation Strategy, planning reform, marine planning, urban regeneration etc. **We believe that community planning should be part of the mix.**
- Page 40-44 – No mention of **planning reform** in the environment section, yet proper planning plays a key role in avoiding damage to the environment. **We would like to see planning reform included in this section.**
- **We believe there is a serious lack of ambition and vision regarding Greenhouse gas emissions.** There is a proposed reduction in GHG is 35% by 2025 whilst the UK Climate Act target is 80% by 2050. **We are also particularly concerned at the lack of**

commitment to a Climate Change Act for Northern Ireland, and would like to see this included in the PfG.

- There is no mention of marine legislation (Priority 3), in particular, the introduction of a **Marine Bill. We believe it is essential that there is a commitment to the introduction of a Marine Bill for NI in the PfG, which provides for healthy, productive, and environmentally resilient seas.**
- **There is no mention of a Natural Flood Risk Management Bill. We believe this needs to be initiated in 2012 and in place by 2015.**
- **Plastic Bag Levy** – We have raised our concerns about this on a number of occasions. The RSPB is in favour of a Plastic Bag Levy, in principle. In fact, we would welcome any initiative which seeks to reduce the number of environmentally damaging plastic bags which are in circulation in Northern Ireland. We also understand that the DoE has a significant budget deficit which it must address in the coming years.

However, we are very concerned how the Plastic Bag Levy is being linked to revenue-raising for the 'Green New Deal' in the recent Draft Budget. In addition, we have major concerns that the continuation of a number of important environmental projects, are dependent upon sufficient revenue from the Plastic Bag Levy being generated, to ensure their future continuation.

Therefore, the RSPB strongly opposes a Plastic Bag Levy (in its current form), as proposed in the DoE Draft Departmental Budget 2011-2015. We reject the proposal, that in order to fund other DoE environmental projects, large numbers of environmentally damaging plastic bags need to be sold to recoup costs.

- **Areas of Special Scientific Interest (ASSIs) - we believe that there should be deliverable targets for ASSI management and protection.** Simply designating our best sites is not enough. **A policy and work plan should be in place by 2013/14, and this could ensure the delivery of all sites into, or approaching favourable condition by 2020.**

We would like further information as to why no sites have been ear-marked for designation in 2012-2013.

- Another building block in Priority 3 is the **Water Framework Directive**. The Water Framework Directive (WFD) is the most substantial piece of European water legislation to date and is designed to improve and integrate the way water bodies are managed throughout Europe. The objective of the WFD is for inland and coastal waters to reach Good Ecological Status (GES) by 2015.

71% of all water bodies within Northern Ireland are currently not meeting Water Framework Directive (WFD) objectives. Without Government intervention, and the implementation of additional measures, there is a significant risk that water environment improvements required by the WFD will not be realised and may well put Northern Ireland at risk of infraction proceedings by the EU, with the further risk of a fine or the requirement to introduce measures which are less cost-effective than it would otherwise adopt.

From these figures it is clear to see that NI is not currently meeting the objectives of this Directive, and is unlikely to do so due to lack of funding allocated for delivery. The delivery of the GES objective is reliant on already existing mechanisms such as the NI Water investment programme, agri-environment schemes and the Nitrates Action Programme (NAP). This is not in the spirit of the directive and puts NI tax payers at further infraction risk. Further still, already existing objectives, such as the NAP have been scrutinised by the Public Accounts Committee (PAC) and seen to not be contributing to the delivery of good water quality. The ambition of Agri-environment schemes has also been scaled back, which were being relied on to deliver measures for good water quality, however the level of ambition for achieving GES has not changed.

Atkins Global produced a costs benefits report on the value of investing in actions which contribute to GES. The report concluded that an investment of £3-15m over the next 15 years would deliver public benefits in the range of £23-25 million. **The RSPB therefore recommend that the Executive invests in a programme of measures that deliver GES by 2016.**

- **CAP** is mentioned as a significant building block towards a healthier environment (Page 29), and the RSPB agrees with this analysis. The RSPB's overriding objective for CAP reform is an increase in funding for agri-environment and other Pillar II schemes, which offer farmers long term assistance for environmental measures. However, in light of proposals that the European Commission are intending to maintain the current funding allocations across the two pillars, the RSPB is also looking at other opportunities to improve environmental delivery from the CAP.

Agri-environment schemes cover approximately 43% of the Utilised Agricultural Area (UAA) in NI and are one of the main mechanisms for delivering biodiversity benefits and other ecosystem services in the wider countryside. Agri-environment schemes also deliver excellent value for money because of the wider socio-economic benefits they provide. For example, research carried out in Wales found that a total spend of £14m on agri-environment between 2000 to 2003, resulted in a total impact of £21m on the economy and the creation of 385 FTE jobs. This is significant given that it is harder to create jobs in rural areas, and half of the money came from Europe making it even better value for national spends. More recent research carried out in England in 2010 found that for every £1 spent in AES, it generated £1.32 in the local economy and when applied nationally it increased to £32 for every pound spent. Equivalent research does not yet exist in Northern Ireland, but we believe schemes here would demonstrate similar value for money, showing AES to be a valuable economic asset.

DARD missed the last PfG target to get 50% of the UAA into agri-environment schemes. **We believe that there should be a target in the PfG to increase funding for rural development and to provide enough funding to allow for a minimum of 50% of the UAA to be brought into agri-environment schemes.**

The draft programme's milestones and outputs

As mentioned above, we are concerned and disappointed at the distinct lack of environmental milestones contained within the Draft Programme for Government.

We believe that the areas listed above under 'perceived gaps in the draft programme' need to be incorporated as milestones and outputs if the PfG is to deliver on its commitments.

Monitoring progress

There is no clear monitoring mechanism beyond 'effective monitoring and regular (quarterly) reporting regimes' (Page 54) and it is therefore unclear what criteria the Executive will use to measure success over the course of this Assembly term.

We would like to see more detailed information on how the Executive plan to monitor the PfG's progress.

For further information, please contact RSPB NI Policy Advocacy Officer, Colum Delaney at 90 690853 or email colum.delaney@rspb.org.uk