

# OEP call for evidence on protected area management

*Comments by*

**Northern Ireland Environment Link Nature and  
Environmental Protection Working Group**

**21<sup>st</sup> April 2023**

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 63 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of members but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

Malachy Campbell  
Senior Policy Officer  
Northern Ireland Environment Link  
89 Loopland Drive  
Belfast  
BT6 9DW  
P: 028 9045 5770  
E: [info@nienvironmentlink.org](mailto:info@nienvironmentlink.org)  
W: [www.nienvironmentlink.org](http://www.nienvironmentlink.org)

*Northern Ireland Environment Link is a Company limited by guarantee NI034988 and registered with The Charity Commission for Northern Ireland NIC10107*

This is a response by Northern Ireland Environment Link's (NIEL's) Nature and Environmental Protection (NEP) working group. This response looks at (a) the legislation (b) site designation (c) site management and finally (d) overall governance issues.

The key messages are that while protected sites are insufficiently designated and their management (and especially improvement) is underfunded across the UK, the situation is particularly concerning in Northern Ireland. This is due to a number of factors including a lack of data, information, capacity, and arguably, political support which have repeatedly hampered action on biodiversity in NI. These challenges are compounded not only by ongoing budgetary pressures and cuts to government departments in NI, especially to DAERA, but also complications arising in cross-border sites which face added challenges from a lack of interoperability and diverging priorities to, in the cases of Carlingford Lough and Lough Neagh, lack of clarity on international borders.

## Introduction

It has been clear for a while that biodiversity in NI is not doing well. As the DAERA draft NI Environment Strategy<sup>i</sup> said

“Key reports in 2019 reported concerning trends in abundance indicators for a suite of species in NI and widespread loss, degradation and fragmentation of habitats.”

There are many other sources of evidence of the poor state of NI's biodiversity. For example, the State of Nature Report (2019)<sup>ii</sup> found that 11% (272) of the 2,450 species found in Northern Ireland that have been assessed using the IUCN Regional Red List criteria, and for which sufficient data were available, are threatened with extinction from Ireland as a whole. The 2015-2020 NI Biodiversity Strategy<sup>iii</sup> was supposed to deliver a plan on how Northern Ireland could meet its local and international commitments to protect nature and ensure the environment can continue to support people and the economy. However, a review of the NI Biodiversity Strategy by RSPB NI<sup>iv</sup> revealed that 83% of government commitments (35/42) set out in the strategy have not been adequately met. NI got a ranking of 12 (out of 240 countries and territories, where a ranking of 1 is the lowest biodiversity intactness and 240 the highest) in a Biodiversity Intactness Index, which indicates how much nature is left from a pristine state, for the amount of nature it has left<sup>v</sup>.

NI has lost more wildlife than anywhere else in the UK. For example, 97% of our wildflower meadows having disappeared<sup>vi</sup>. In terms of water quality, an underpinning requirement for aquatic biodiversity, the picture shows constant and serious decline. Having failed to meet the WFD targets for 2015, the target was for 70% of water bodies (rivers, lakes, transitional and coastal water bodies, and groundwater bodies) in Northern Ireland to have achieved GES by 2021. However, there has been an ongoing decline in the 52 water bodies achieving good environmental status (GES) since 2015 which is a clear indication that recent measures are not adequate to address the significant water management issues in NI. In 2015 37.4% of NI's water bodies achieved GES. By 2018 this had fallen further to 36.6% of

NI's water bodies achieving GES. According to the statistics on freshwater quality standards released in August 2020<sup>vii</sup>, 95% of NI's lakes failed Water Framework Directive quality standards with only one lake out of twenty one in Good condition in 2019 compared to five out of twenty one lakes in Good condition in 2015. However, according to the Water Framework Directive Statistics report<sup>viii</sup> published in December 2021 by DAERA, the situation had worsened with no rivers, no lakes and no transitional and coastal water bodies in Northern Ireland achieving good environmental status in 2021 and only 685 of groundwater resources achieving good status<sup>ix</sup>. NIEL is concerned that the long term ambition of DAERA and the NI Executive falls short of the WFD targets, as illustrated by the fact that the target on page 24 of the draft Environment Strategy<sup>x</sup>, is to have "By 2027: 70% of waterbodies at Good Status"

In this context, protected sites and their management have a major role to play, yet even the habitats and species within NI's Areas of Special Scientific Interest (ASSIs)<sup>xi</sup> which are designated under the Environment Order (Northern Ireland) 2002, Part IV<sup>xii</sup> are not immune from deterioration. According to the NI Environmental Statistics report 2021, 36% of the features in NI's ASSIs were in unfavourable condition in 2020 with 61% in favourable condition<sup>xiii</sup>. This represented a deterioration of the situation from the previous year when 35% of ASSI features were in unfavourable condition<sup>xiv</sup>. DAERA's Environmental Statistics Report 2022<sup>xv</sup> took a different approach to monitoring and reporting on the status of features in our ASSIs which means it is not possible to make a direct comparison with previous years. For the first time in 2022, a combined feature condition metric for Northern Ireland was produced for total network features on land and at sea. This is a more continuous approach to align with reporting methods used in other regions of the UK. According to the 2022 Environmental Statistics report, for the 2021/22 reporting period, 55% of all features were in favourable condition, 36% were in unfavourable condition, 3% were unfavourable-recovering and less than 1% were destroyed. Six per cent of features had not had a formal condition assessment, and so a feature condition assessment could not be determined for these features. That is an unacceptably poor level of protection and indicative that our nature protection laws are not working as intended.

- **The legislation**

The legislation related to protected sites, most notably the Birds and Habitats directive which underpin the Natura 2000 or N2K network, have been repeatedly reviewed and the subject of numerous reports. A UK Government review of its implementation in England which reported in 2012<sup>xvi</sup> and a long REFIT process at EU level (2014-2016) which queried whether the directives were *effective* in meeting their objectives, *efficient* in terms of resource use, *relevant* to current needs and circumstances, *coherent* internally and with other EU legislation, and whether they offered *EU added value*. While the latter criteria is not relevant in a post-Brexit context the first four are still very much so. The review, which was over 600 pages in length, produced by a consortium of experts on the two directives, and the engagement of over 500,000 EU citizens in defense of these rules (including 100,000 UK citizens) indicates both the large evidence base available and the breadth of popular support for these rules<sup>xvii</sup>. The EU REFIT<sup>xviii</sup> process critically concluded that the two directives were '*fit for purpose*' but that their *implementation* was lacking, concluding that

“robust evidence shows that, where properly implemented, the Directives have reduced pressures on biodiversity, slowed declines and, with time, led to some recoveries of habitats and species.”

In the UK context, *coherence* is also a matter of how the different types of sites protection fit together and their interaction with planning and farming in particular, but also, more recently, the extractive industries such as the proposed gold mining operations in the Sperrins, as well as with broader environmental legislation. In NI, The Wildlife and Natural Environment Act (Northern Ireland) 2011<sup>xxix</sup> (the WANE Act) places a statutory duty on public bodies to conserve biodiversity. However, this has not been implemented well by many departments and local authorities. The activities of government departments including DAERA, DfI as well as local planning authorities often have a crucial role in impacting biodiversity, though many of those bodies are often under-resourced and lacking in sufficient ecological expertise. NIEL understands that it is DAERA’s responsibility to oversee compliance with the Biodiversity Duty. This is potentially one of the functions that could be transferred to an independent environmental protection agency (EPA) if and when one is established.

- **Site designation.**

There is also an issue in relation to the rate of designation of protected areas in Northern Ireland. According to official DAERA figures in the annual Environmental Statistics Report, between 31<sup>st</sup> March 2017<sup>xx</sup> and 31<sup>st</sup> March 2022<sup>xxi</sup> only four additional ASSIs, covering 459 hectares, were designated, with no overall change in the total number of SACs and SPAs designated in that five year period.

Furthermore, the evidence suggests that the current level of site designation, which has effectively stagnated, is neither halting, nor reversing biodiversity decline. In addition to the evidence outlined in the introduction to this submission, the 2023 Northern Ireland Priority Species report<sup>xxii</sup> produced by the Northern Ireland Environment Agency (NIEA) listed an additional 113 species<sup>xxiii</sup> as compared to the last report in 2010, giving a total of 592 priority species. While in some ways it is good that more species are listed as being worthy of requiring conservation action, as that should help those species listed, priority species require conservation action because of their decline, rarity and importance in an all-Ireland and UK context<sup>xxiv</sup> and so a listing is an indication there are problems for the species listed.

- **Site management**

As of April 2023, NI has 58 SACs and according to the DAERA website<sup>xxv</sup>, DAERA is “preparing individual Conservation Management Plans for 57 of our SACs.” NIEL is unsure which SACs lack management plans at present and how many SAC management plans remain to be completed but this does raise questions as to how and why SACs were designated in the absence of a management plan. Related to that, target 11 in the DAERA business plan 2021-22<sup>xxvi</sup> was to “Complete 15 draft Special Areas of Conservation (SAC) Conservation Management Plans” by 31 March 2022. The DAERA business plan did not

specify how many SACs would remain without a management plan if and when that target is met, when all other SAC management plans would be completed or what 'management' applies to our SACs in the absence of management those plans, so there is also an issue in relation to the provision of information on protected area management in Northern Ireland. The lack of appropriate management plans for what are meant to be some of our most protected and long standing designated areas is an obvious and serious shortcoming.

Concern about these shortcomings is compounded by the vagueness of the actions and targets included in, for example, the draft NI Environment Strategy<sup>xxvii</sup>. In Strategic Environmental Outcome 3 'Thriving, resilient & connected nature and wildlife' in the draft NI Environment Strategy, one of the "Actions & Targets" is to

"Develop and publish a new Biodiversity Strategy 2030 by 2022 to enable achievement of post-2020 international commitments (CBD) and delivery of UK Biodiversity Framework."

The WANE Act requires the department to publish a biodiversity strategy not later than 5 years after the act came into operation of subsection and at least once in every period of 5 years thereafter. Apart from the fact that, at the time of writing (April 2023), no new biodiversity strategy for NI up to 2030 has been published, the fact that "Actions & Targets" are lumped together and not differentiated, means there is a lack of clarity about what targets are being set and/or what commitments are being made. This lack of clarity makes it very difficult for stakeholders to know what management, if any, is taking place, at any particular time and so makes it very difficult, if not impossible, to hold statutory bodies to account.

Lough Neagh is an ASSI<sup>xxviii</sup>, an SPA<sup>xxix</sup> and a Ramsar<sup>xxx</sup> site and is the largest lake in the UK and Ireland. The situation in Lough Neagh illustrates many of the problems in relation to the management of what are meant to be protected areas in NI.

Sand and gravel dredging from the lough has been going on for decades. The sand and gravel extracted from the lough was and is used across Northern Ireland in the construction industry. However, it appears this extraction was taking place without planning permission. This changed in 2020 when the Infrastructure Minister at the time granted approval for the practice to continue, subject to conditions, including the identification of specific areas from where sand and gravel could be extracted and limiting the amount of sand that could be dredged, to 1.5m tonnes each year. The Belfast Telegraph<sup>xxxi</sup> reported that 46 potential planning breaches of this practice have taken place in the past two years up to March 2023, though this has been rejected by the Department for Infrastructure. According to FoE NI, the Court of Appeal has made it clear that the government is legally required to take a precautionary approach but it appears that has not been the case<sup>xxxii</sup>.

NIEL understands that there are issues in relation to the regulation of some of our other freshwater resources, some of which centre on the application of Habitat Regulations Assessments (HRAs) and/or other environmental assessments as part of the process of

developing fishery management plans such as those in Lough Erne and Lough Neagh. In fact, Fish Legal has referred environmental regulators in Northern Ireland to the Office for Environmental Protection (OEP) for failing to protect migratory fish including salmon, dolly and brown trout on the Crumlin River which flows into Lough Neagh<sup>xxxiii</sup>. As part of this case, the Department of Agriculture, Environment and Rural Affairs (DAERA) and Northern Ireland Environment Agency (NIEA) are both under formal investigation for not acting to stop the abstraction of water on the River Crumlin, leaving a section of the river severely depleted, preventing adult fish from reaching their spawning grounds.

The plight of the freshwater pearl mussel in NI also helps to illustrate the scale of the problem. In 2019, an official UK report<sup>xxxiv</sup> on the freshwater pearl mussel, produced as part of the reporting process on the implementation of the Habitats Directive in the UK said that

“the lack of juvenile recruitment and an ageing population will almost certainly lead to the future extinction of this species from NI, unless there is a fundamental improvement of their current habitat”.

If the NI administration and DAERA in particular, can not ensure that the features of our ASSIs, and other areas which are protected by law, are kept in favourable condition and that, as a result, an internationally protected species, the freshwater pearl mussel, is threatened with extinction, then it is clear that different decisions need to be made and as a matter of urgency.

- **Overall governance.**

There are a number of problematic aspects of the overall governance of Northern Ireland's environment, some of which are explored below.

### **A lack of SMART targets in official strategies**

An analysis<sup>xxxv</sup> of the draft Environment Strategy, which will also act as NI's first Environmental Improvement Plan, indicates that of the 225 targets/actions, 76% (172) are not timebound, 18 relate to 2021/2022<sup>xxxvi</sup>, and 73% (166) are not sufficiently specific to be measurable. Such weak targets undermine the effectiveness of the strategy and will fail to drive necessary action and resourcing to restore and improve nature. Indeed, some proposed actions/targets represent a regression on previous commitments, for example, the target on page 24 of the draft strategy to only have 70% of NI's water bodies achieve GES by 2027. Also, on page 47 of the draft strategy there is a target to have 75% of 150,000 hectares of protected sites to protected sites to favourable condition when the previous target was for 95% of the features underlying the designation of ASSIs to be in, or approaching, favourable conservation condition by 2016<sup>xxxvii</sup>. So, not only were previous targets not met but lower targets are being proposed, which is unacceptable.

### **Weak or missing targets in official strategies**

The target on page 46 of the draft Environment Strategy to increase NI woodland cover to 8.8% (122,000 hectares) by 2030 is an example of a lack of ambition resulting in an inappropriate target. According to DAERA's NI Woodland Register<sup>xxxviii</sup>, woodland cover in 2020 in NI was 8.7% (118,381 hectares). A target of 8.8% woodland cover by 2030 would represent an increase of only 0.1% in woodland cover and would equate to planting approximately 450 hectares of trees per year over the next eight years. This is less than the target in the Forests for Our Future Programme<sup>xxxix</sup> of planting 9,000 hectares of new woodland by 2030 (approximately 900 hectares per year) and falls significantly short of the recommendations made by the CCC in the Balanced Net Zero Pathway set out in the Sixth Carbon Budget<sup>xl</sup>.

In addition to the lack of SMART targets, NIEL is concerned by the omission of certain issues from the draft Environment Strategy, for example, the need to reduce diffuse pollution of freshwater, methane emissions, wildlife crime and biosecurity in relation to invasive and non-native species.

### **Inconsistency in official strategies**

One "Future Vision/Outcome" for Strategic Environmental Outcome (SEO) 1 in the draft Environment Strategy for example is "Cleaner air in Northern Ireland." This lack of detail is wholly inappropriate and unacceptable. Amongst other things, the environment strategy needs to identify the target pollutants e.g. PM<sub>10</sub> and PM<sub>2.5</sub>, along with the target level in absolute and percentage terms relative to specified baselines and the date by which that target level is to be achieved. There are very specific legal limits on the levels of both of these pollutants, for example as outlined in table 1-2 on page 13 of DAERA's draft Clean Air Strategy for NI<sup>xli</sup>. However, the draft environment strategy does not even make a commitment to meet and maintain these targets, never mind surpass them.

The 'Actions & Targets' section on page 65 of the draft Environment Strategy SEO 5 merely refers to "Legislation to reduce the consumption of single use plastic items (SUP)" rather than incorporating the commitment made in New Decade, New Approach, (NDNA)<sup>xlii</sup> (on page 44) that "The Executive will create a plan to eliminate plastic pollution".

The rationale for this inconsistency is initially unclear.

### **Lack of implementation of targets in previously agreed strategies**

Also on page 44 of NDNA<sup>xliii</sup> is a commitment that further to the need for the Executive to bring forward a Climate Change act to give environmental targets a strong legal underpinning,

"The Executive will establish an Independent Environmental Protection Agency to oversee this work and ensure targets are met."

At the time of writing, plans for establishing an independent Environmental Protection Agency (EPA) in NI have still not been brought forward.

### **The continuation of historically bad practice.**

Lough Neagh is an example of where bad practice and the neglect of nature protection has continued. Establishing an independent EPA would give opportunity to move away from bad historical practice. However, it is recognized that an EPA will not necessarily solve all NI's problems. Councils are also critical in implementing environmental regulations and additional training and funding (as well as serious fines/consequences when found in breach) will likely also be required.

### **Lack of data.**

There is still no comprehensive habitats inventory for NI. This has practical implications for land-use policy decisions, relevant to planning, forestry and agriculture amongst other sectors. The survey and monitoring team in NIEA needs adequate resourcing, including strong technical support on data management and GIS.

### **Lack of transparency and accessibility to data.**

It is important to note here that there is a stark divergence between England and Northern Ireland on access to data on protected sites. Whereas England has, via the Natural England "Designated Sites View" portal an option that is easily accessible by all, figures on ASSI condition, compliance and so on, in NI are only accessible via Data Access Requests and Freedom of Information which require considerable time and effort for both those requesting the information and DAERA. Looking internationally, better data access and sharing practice were identified as far back as the 2012 Government review<sup>xiv</sup> which highlighted how data can be accessed quite readily in other European countries. In Germany for example, once data has been collected it is held by the regional authority (the Länder), to help their decision making. In France, data becomes publicly available unless a developer can justify why it should remain private. The Netherlands has a National Data Authority which holds data from NGOs and from previous assessments.

### **Cross-border challenges.**

NIEL understands that there are issues in relation to the cross border SPAs in Carlingford Lough and Lough Foyle. The border has added complications to management with differing legislation and lack of standardization of management in the region. This has slowed progress with achieving site objectives. There have also been issues with sites receiving full designation status, specifically a delay with Carlingford SPA, and there is now potential for legislative divergence following Brexit (both in terms of designation and environmental assessment of development/activities). These MPAs have historical problems regarding the lack of regulation/licensing for certain activities such as aquaculture in Lough Foyle due to the 'contested waters' i.e. the lack of clarity in relation to the border between NI and RoI and therefore who has responsibility for what and where. MARPAMM was to provide solutions to management issues at these sites through MPA management plans, but final versions of



those management plans have yet to be published.

-ENDS-

## REFERENCES

- 
- <sup>i</sup> <https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Draft%20Environment%20Strategy.PDF> (p45)
- <sup>ii</sup> <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-Northern-Ireland-summary.pdf>
- <sup>iii</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/doe/natural-policy-biodiversity-strategy-to-2020-2015.pdf>
- <sup>iv</sup> <https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/rspb-ni-northern-ireland-biodiversity-strategy-failing-after-years-of-inaction/#:~:text=On%20the%20day%20that%20a,have%20not%20been%20adequately%20met.>
- <sup>v</sup> <https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodiversity-intactness-index-summary-report-v4.pdf>
- <sup>vi</sup> <https://nbn.org.uk/wp-content/uploads/2019/09/State-of-Nature-2019-UK-full-report.pdf>
- <sup>vii</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Water%20Framework%20Directive%20-%20Statistics%20report%20-Lake%20Quality%20Update%202020.pdf>
- <sup>viii</sup> <https://www.daera-ni.gov.uk/publications/northern-ireland-water-framework-directive-statistics-report-2021>
- <sup>ix</sup> Ibid
- <sup>x</sup> <https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Draft%20Environment%20Strategy.PDF>
- <sup>xi</sup> <https://www.daera-ni.gov.uk/topics/land-and-landscapes/areas-special-scientific-interest>
- <sup>xii</sup> <https://www.legislation.gov.uk/nisi/2002/3153/part/IV>
- <sup>xiii</sup> DAERA Northern Ireland Environmental Statistics report 2021 <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2021.pdf>
- <sup>xiv</sup> DAERA Northern Ireland Environmental Statistics Report 2020 [https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2020\\_0.pdf](https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2020_0.pdf)
- <sup>xv</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2022.pdf> see page 35
- <sup>xvi</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69513/pb13724-habitats-review-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69513/pb13724-habitats-review-report.pdf)
- <sup>xvii</sup> <https://environmentaleurope.ideason europe.eu/2016/12/07/naturealertrefit/>
- <sup>xviii</sup> <http://www.europarc.org/wp-content/uploads/2016/09/Fitness Check Final Report.pdf> p. 15
- <sup>xix</sup> <https://www.legislation.gov.uk/nia/2011/15/introduction>
- <sup>xx</sup> [https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2018\\_1.pdf](https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2018_1.pdf)
- <sup>xxi</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/ni-environmental-statistics-report-2022.pdf>
- <sup>xxii</sup> <https://www.daera-ni.gov.uk/publications/list-northern-ireland-priority-species-2023>
- <sup>xxiii</sup> <https://www.ulsterwildlife.org/blog/annika-clements/positive-additions-ni-priority-species-list>
- <sup>xxiv</sup> <https://www.daera-ni.gov.uk/articles/northern-ireland-priority-species>
- <sup>xxv</sup> <https://www.daera-ni.gov.uk/articles/conservation-management-plans-northern-irelands-special-areas-conservation>
- <sup>xxvi</sup> <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/20.21.193%20DAERA%20Business%20Plan%202021%20V5.PDF>
- <sup>xxvii</sup> <https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Draft%20Environment%20Strategy.PDF>
- <sup>xxviii</sup> <https://www.daera-ni.gov.uk/publications/lough-neagh-assi>
- <sup>xxix</sup> <https://www.daera-ni.gov.uk/protected-areas/lough-neagh-and-lough-beg-spa>

- 
- <sup>xxx</sup> <https://www.daera-ni.gov.uk/protected-areas/lough-neagh-and-lough-beg-ramsar-0>
- <sup>xxx</sup> <https://www.belfasttelegraph.co.uk/news/environment/dfi-disputes-lack-of-enforcement-of-illegal-dredging-from-lough-neagh/814760081.html>
- <sup>xxxii</sup> <https://friendsoftheearth.uk/latest/lough-neagh-why-europes-wildlife-jewel-needs-space-breathe>
- <sup>xxxiii</sup> <https://fishlegal.net/2023/04/06/environmental-regulators-in-northern-ireland-under-investigation-for-failing-salmon/>
- <sup>xxxiv</sup> UK's 2019 Article 17 report <https://jncc.gov.uk/our-work/article-17-habitats-directive-report-2019/>
- <sup>xxxv</sup> Carried out by RSPB Northern Ireland.
- <sup>xxxvi</sup> Two of these have already been missed: (1) By end of 2021: Publish an Action Plan that will identify a range of supporting actions to deliver a forthcoming Energy Strategy. (2) Publish NI Circularity Gap Report by 2021.
- <sup>xxxvii</sup> Response by the Minister for the Environment (2010) to AQW 6012/10 on 12<sup>th</sup> April 2010  
<http://aims.niassembly.gov.uk/questions/printquestionssummary.aspx?docid=70261>
- <sup>xxxviii</sup> <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.daera-ni.gov.uk%2Fsites%2Fdefault%2Ffiles%2Fpublications%2Fdaera%2FForest%2520Service%2520woodland%2520Register%2520and%2520basemap%2520-%2520Stakeholder%2520summary%2520report%2520V2.DOCX&wdOrigin=BROWSELINK>
- <sup>xxxix</sup> <https://www.daera-ni.gov.uk/news/forest-our-future-forest-expansion-scheme-reopens>
- <sup>xl</sup> <https://www.theccc.org.uk/publication/sixth-carbon-budget/>
- <sup>xli</sup> <https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/20.21.066%20Draft%20Clean%20Air%20Strategy%20for%20NI%20-%20Public%20Discussion%20Doc%20Final%20V6.PDF>
- <sup>xlii</sup>
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/856998/2020-01-08\\_a\\_new\\_decade\\_a\\_new\\_approach.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf)
- <sup>xliii</sup>
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/856998/2020-01-08\\_a\\_new\\_decade\\_a\\_new\\_approach.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/856998/2020-01-08_a_new_decade_a_new_approach.pdf)
- <sup>xliv</sup>
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69513/pb13724-habitats-review-report.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69513/pb13724-habitats-review-report.pdf) (p14)