



Nature Recovery Strategy Consultation

Draft Comments by NI Freshwater Taskforce and NI Marine Taskforce

March 2026

The NI Freshwater Task Force (FWTF) is a representative body of eNGOs working together under the Northern Ireland Environment Link (NIEL) umbrella. Current members of the FWTF include: Ulster Wildlife; RSPB; The Rivers Trust; Ulster Anglers Federation; National Trust; Woodland Trust; Wildfowl and Wetlands Trust; Friends of the Earth; Surfers Against Sewage; NI Marine Taskforce and Sustainable Water Action Network. The FWTF aims to protect and improve Northern Ireland's freshwater ecosystems through collaborative action, research, and advocacy.

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.

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.

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The NIMTF and the NI FWTF jointly welcome the progress that has been made in publishing the draft Nature Recovery Strategy (NRS) but feel that there is significant room for improvement in terms of scope and ambition. There are a number of cross-cutting issues relating to the structure and content of the draft document and, at a time when biodiversity is under more pressure than ever, we are concerned that these issues will hinder the effectiveness of the strategy. Beyond these cross-cutting issues, we also feel that the draft strategy does not adequately address the particular challenges facing water-dependent species and the habitats they rely on (in both marine and freshwater contexts). For these reasons, both the NIMTF and the FWTF argue that the draft strategy needs to be significantly revised. We provide more detail below on both the cross-cutting issues, and the water-specific points. The FWTF is ready to engage constructively with the Department on any of the issues raised in this document, to create a NRS that will truly deliver change for our water environment.

Cross-cutting Issues

In common with the environment sector as a whole, we argue that one of the most significant shortcomings of the draft strategy is the lack of legally binding SMART targets. Meaningful progress on nature recovery will only be achieved through establishing a firm legal foundation to provoke ambitious action, with targets that are timebound and measurable so that success can be assessed. In addition, we question the fact that ‘30by30’ is highlighted in the draft strategy as being the Global Biodiversity Framework’s (GBF) apex target. The GBF text notably avoids suggesting that one target is more important than others. If anything, one might argue that the apex target is the overarching mission to halt and reverse the loss of nature by 2030. In light of this, we argue that the targets contained within the draft strategy need to be significantly revised.

Another obvious shortcoming is a lack of reference to delivery plans. We note that the [OEP](#) has also highlighted the need for the final NRS to ‘scale and speed up implementation.’ We agree with the OEP’s assessment that, to deliver for nature, the strategy needs to provide greater focus on tangible action and delivery. In addition, while urgent action is needed now, the Strategy should extend beyond 2032 and set out a clear pathway to 2042, reflecting the timescales required for genuine ecological recovery. This longer-term framework would provide greater consistency and assurance, helping to deliver newly developed strategies effectively. The Strategy should commit to a structured cycle of review points to assess progress and effectiveness, with interim reviews in 2030, 2035 and 2040 to ensure that actions remain on track and can be adapted as evidence evolves.

We would also question the structure that has been adopted for the draft strategy, and the five strategic objectives that have been identified. The strategic objectives themselves are too high-level, and some (particularly SO 3) could be interpreted as vision statements, rather than strategic objectives. In addition, there is significant overlap between the areas that have been identified, which will inevitably create difficulties in terms of delivery and monitoring performance. In particular, this will generate uncertainty for stakeholders in terms of how they can contribute to overarching goals. For these reasons, we feel that the structure is likely to undermine the effectiveness of the strategy itself and recommend that this is

revisited. As an alternative, we strongly urge the Department to use the targets in the Convention on Biological Diversity (CBD) as a structure for the Nature Recovery Strategy. Doing so would enable the required alignment between the Nature Recovery Strategy and the CBD and therefore improve the effectiveness of delivery of both. We note that the Nature Recovery Strategy should function as a delivery mechanism for the GBF, underlining the need for strong correlation between these.

We also feel that the draft strategy is missing a number of critical elements. Specifically, there is no information about levels of funding that are available/ have been allocated for taking any of the actions forward and, indeed, there is no information about delivery plans in the document. We know that in NI, some of the ongoing problems with environmental law and policy have been related to ineffective implementation and restrictions around funding (eg see OEP [report](#) on implementation of the Water Framework Directive regulations and River Basin Management Planning in NI). If this strategy is to achieve its' stated aims, then it is of critical importance that these issues are addressed in a strategic way. Relatedly, we feel that the document does not contain enough information about monitoring to assess progress and outcomes.

Another key weakness is that the strategy does not adequately use existing evidence to inform the structure and/ or the actions that it contains. Importantly, this issue was highlighted in a 2024 [report](#) on the 'Impact of Nutrient Enrichment and Hydromorphological Modification on Riverine Biodiversity in NI' (p84), which was prepared by althea for the OEP as part of their [research](#) into the drivers and pressures affecting nature in NI. The report highlighted critical gaps in existing data (for example, the report highlights a number of priority research areas, such as 'Identifying cumulative and emerging threats to biodiversity (p69)'). However, the report also underlines the fact that existing data is not being used to full effect to inform practice and policy in relation to freshwater environments, citing the example of datasets on the Atlantic Salmon in the River Bush held by AFBI (p77). Indeed, this report, and the broader [OEP report](#) and work in this area provide valuable evidence on the factors that are impacting biodiversity in the freshwater environment. This should be used to inform both the structure and actions contained within the final version of the Nature Recovery Strategy.

In addition, the draft strategy should be much clearer that action will be required across departmental portfolios. Given nature's impact on communities, the economy and society, it is vital that its restoration is seen as a cross-cutting objective for the Assembly and not the ambition of a single Department. The Nature Recovery Strategy should be embedded within wider governmental programmes and initiatives rather than viewed in isolation. It must also be mainstreamed across society so that the value of thriving nature, including its natural capital, ecosystem services and wider contribution to public wellbeing and economic resilience, is fully recognised and understood across the Assembly and communicated effectively to wider society. In doing so, government must also consider the full cost–benefit of actions, including the environmental, economic, and indirect costs of remediating the consequences of damaging behaviour. Recognising these costs, alongside the substantial benefits of healthy ecosystems, is essential to ensuring that nature recovery becomes a shared, strategic priority across all departments and sectors.

The group also emphasises the need for effective governance structures to support delivery of the NRS. For any strategy to succeed there must be clear structures for monitoring, review, and oversight. To enable this the suggested Nature Recovery Forum should be established at pace to scrutinise progress against targets and legal requirements; monitor the impact of the Strategy; advise on emerging evidence; and recommend adjustments as circumstances evolve. This should have an independent Chair, to ensure impartiality and credibility, and it should maintain close links with other bodies responsible for monitoring overlapping legislative and strategic areas.

The Forum should also play a role in assessing the effectiveness of actions, reviewing delivery risks, and ensuring that the Strategy remains aligned with wider government priorities, including climate, water quality, land-use planning and marine management. A transparent, cross-departmental oversight mechanism is essential to ensure accountability, maintain public confidence and support the long-term delivery of nature recovery across Northern Ireland.

Finally, members of the FWTF would highlight that the draft strategy has not fully accounted for the outworkings of the co-design process that took place in 2023 (which some of our members were involved in). Members feel that some important points emerged from that process, and these have not been reflected in the draft document. For instance, the co-design process produced some suggested targets to be included in the Nature Recovery Strategy (eg 'By 2027: Environmental Quality Standards (EQS) for water-dependent protected sites where WFD regulations are not considered stringent enough are designed and implemented'), but many of these have not been incorporated into the draft document. The FWTF recommends that this important work is fully accounted for in the final version of the Nature Recovery Strategy and is happy to engage with the Department to support this.

Freshwater-specific Issues

The FWTF feels strongly that the draft strategy does not contain enough specific reference to the freshwater environment in NI and the particular issues and vulnerabilities in this context. Although some reference is made at the beginning of the document to existing freshwater legislation and policy (such as the River Basin Management Plan), and a point is made under SO1 in relation to the development of a Protected Sites Delivery Plan for terrestrial and freshwater sites, these are the only references made in the document to freshwater. The FWTF feel that this falls far short of the degree of action that is required to tackle the ongoing crisis in our inland and coastal/ estuarine water bodies and the impact that this has on nature recovery in our freshwater ecosystems. This is a significant oversight and weakness in the draft strategy, and we suggest that it should be revised to include much clearer actions relating to freshwater.

It is clear that our waterways are in crisis. Available statistics indicate that, not only are freshwater habitats and species struggling, but the situation is actually getting worse. The most recently published statistics for NI under the Water Framework Directive (published in [2025](#)) show that only 29% of our surface waters reach at least 'good' ecological status – a decrease from the previous monitoring cycle. Worryingly,

the same report indicates that 12% of surface water bodies in NI are at 'bad' ecological status. In addition, protected sites across NI are in a worrying state of decline, with only [54%](#) of features in Marine and Terrestrial protected sites in favourable condition. However, the data is even more concerning when examining the freshwater statistics in greater detail. [2024/25](#) statistics indicate that, of those features within the 'Freshwater,' 'Fish,' 'Fen, Marsh and Swamp,' and 'Bogs' categories, only 26% are at favourable status. Global statistics underline the critical condition of freshwater habitats and species, with the [IUCN](#) confirming that, worldwide, 'freshwater species are declining faster than those on land and in the oceans.'

The freshwater environment is impacted by a range of (often overlapping) pressures and human activity. Recent [research](#) has explored the interconnected nature of multiple threats impacting freshwater biodiversity, and explains the unique 'double jeopardy' faced by freshwater ecosystems as they experience impacts caused by direct threats to river channels (such as flow modification) as well as threats that operate across entire watersheds (such as land use change and pollution). Addressing these pressures can be a complicated and expensive undertaking. However, the complexity involved in addressing these issues should not be a barrier to action. Indeed, given the distinct vulnerability of freshwater ecosystems, it is perhaps even more critical that this is specifically addressed in the nature recovery strategy. Freshwater nature recovery needs to include consideration of water quality, habitat restoration and connectivity, climate resilience, sustainable water use, as well as a host of other issues. In addition, it is essential to plan freshwater nature recovery at the catchment scale, using a source-to-sea approach. Indeed, this is already required by the WFD. Actions are likely to require commitment and engagement across departmental portfolios and across the political spectrum. The FWTF feels that there are existing obligations in law and policy that can facilitate the nuanced approach that is required, but that these are not currently being effectively implemented. In addition, there are a number of additional actions that we feel should be included in the strategy. We say more about both of these below.

First, it is important to clarify that there are serious issues with the implementation of existing freshwater-related obligations (for instance, under the WFD). Although the draft strategy does refer to issues with the implementation of legislation related to protected sites, we would highlight that some of the flagship policies that are designed to protect our water environment have been significantly delayed, and/ or have faced issues with implementation related to funding. For instance, in 2024, the OEP published a [Review of Implementation of the Water Framework Directive Regulations and River Basin Management Planning in NI](#). This report highlighted that, although the existing framework prescribed by the WFD Regulations is 'broadly sound' as a means of improving the water environment, 'it is not being implemented effectively and is far from delivering as it should.' We argue that the nature recovery strategy must include acknowledgement of these difficulties and provide information about how these existing obligations are likely to be met (through identifying funding streams, for example). Effective implementation of existing obligations is likely to have a positive impact on the freshwater environment.

One of the key elements that we feel would significantly strengthen the strategy is a commitment and legally binding target to restore river connectivity at scale across NI.

We note that the EU Nature Restoration law contains reference to the importance of re-connecting rivers and incorporates a specific legally binding target to restore at least 25,000km of rivers to a free-flowing state by 2030. Relatedly, an extensive programme of river barrier removal is currently being rolled out in Ireland under the [National Barriers Mitigation Programme](#). No such programme of work exists in NI. The FWTF is currently carrying out research related to river barriers in NI, and the challenges and opportunities that exist in this context. We would stress the critical importance of addressing this issue in the nature recovery strategy, given the significant impact that river barriers have on freshwater habitats and biodiversity, and their widespread existence in NI waterways. We suggest that, in line with the achievement of the 30x30 target, the Nature Recovery Strategy should contain an explicit legally binding target to restore NI rivers to a free-flowing state by 2030. Assessment will need to be carried out to identify the number and location of existing problematic river barriers, and this will help to inform an appropriate target and timeline. The final Nature Recovery Strategy should, therefore, contain an action to carry out this assessment, with a view to setting a specific target. Beyond the practical realities of reconnecting rivers, and the impact that this will have on freshwater species and habitats, we also note the potential for significant cross-border divergence in this context.

We also note the underexplored potential of pond restoration in NI as a means of contributing to nature recovery. [Research](#) on pond restoration in England and Wales has highlighted that, when unpolluted, ponds can have an enormous positive impact on nature, considering the small area they occupy, and can create ‘hotspots’ for wildlife. We suggest that an action plan for pond restoration across NI should be developed at pace to capitalise on these possible benefits. Planning for pond restoration must be done at landscape scale, and the FWTF are happy to engage with the Department to discuss this in more detail.

We note that the draft strategy makes reference to the development of a new Invasive Species Strategy. However, an Invasive Species Strategy already exists, having been [established in 2013](#), [revised in 2018](#) and an [annual progress report provided in 2017](#) with further recommendations to be made. Given that the [Shared Island Invasive Species and Biosecurity Initiative already exists, complete with €1.3 million in funding to 2029 aimed at strengthening cross-border co-operation to manage invasive species](#), it is suggested that instead of creating a brand new strategy for this area, that the current invasive species strategy is updated to account for the existing co-development and co-design work which has gone into the current strategy to be implemented and enhanced further. For example, one recommendation for the marine environment was for DAERA Marine and Fisheries Division to develop a “Marine Biosecurity Planning Guide for Northern Ireland” (under Section 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 commencing](#).

There are also some limitations with the existing Invasive Species Strategy, which at the outset does not apply to islands within Strangford Lough, and therefore could also pose an issue for islands within other sea loughs such as Carlingford and Foyle. Instead, existing measures such as greater awareness, implementation and

enforcement of the [“Check, Clean, Dry” process](#) should be followed for all anglers. In addition, we underline the importance of accounting for the significant economic impact of invasive species in the freshwater environment in the further development of the Invasive Species Strategy. Although previous [research](#) has highlighted the scale of the economic impact across NI, we would draw attention to the possible effects on drinking water supplies and other service provision by freshwater invasive species such as the Asian clam. It is important that the Invasive Species Strategy incorporates this element in terms of raising public awareness of the issues.

The draft strategy needs to consider in more depth the threat of pathogens to biodiversity. Water is a prime vector for the transport of pathogens, and movement from one water body to another can occur easily. For example, [research](#) has shown the presence of antimicrobial resistant genes in Lough Neagh. A recently announced [research project](#) aims to map and analyse the behaviour of microbes and AMR across Lough Neagh. This project will conclude in late 2027. We suggest that similar research and analysis should be carried out across all significant water bodies in NI, so that risks to species and habitats can be adequately mapped, assessed and addressed.

We also feel that the draft strategy does not adequately account for the particular vulnerabilities of transitional waters, and the issues that are currently facing biodiversity in this context. It is noted that Belfast Lough is subject to the dumping of 17+ million tonnes of raw sewage entering Belfast Lough through wastewater treatment works and sewage discharge points. Given that Belfast Lough is home to Shellfish Water Protection Areas and shellfish aquaculture, it is understandable that water quality in this area falls under the classification B/C which has knock-on effects to economics due to the requirement for any shellfish produce requiring depuration to eliminate the presence of bio-accumulated toxins within their flesh for human consumption. According to the NI Audit Office, 1 in 8 pollution incidents were linked to NI Water operations in 2022.

Strangford Lough is subject to agricultural inputs which are having negative impacts nearer the upper stretch of the Lough. Further work is needed to address water pollution across both the agricultural and wastewater inputs as both are having negative impacts upon marine habitats, species but also on communities and the economy for society’s associated livelihoods. According to the NI Audit Office, 1 in 4 pollution incidents were linked to the agri-sector in 2022.

We would also suggest that the draft strategy has overlooked some key opportunities and gaps in relation to monitoring and wider public engagement. Water is a public concern – NIEL has carried out research that indicates that concern levels are high in relation to the health of our waterways. We also have an extensive network of people who use and engage with our waterways for recreational purposes, including anglers, water sports professionals and enthusiasts, and swimmers. We feel that there are significant opportunities for engaging this population with citizen science initiatives, and that the Nature Recovery Strategy should make clear how these opportunities might be leveraged to improve biodiversity outcomes.

The strategy should also make reference to sustainable water use, as this has a critical impact on freshwater biodiversity (and we note that the strategy does make reference to sustainable land use). This includes, for example, issues around abstraction. Comprehensive [research](#) on the impacts of unsustainable abstraction on freshwater environments has been published by the Sustainable Water Network Ireland ([SWAN](#)), and includes a section on Northern Ireland. This paper notes that ‘over-abstraction of water has the potential to impact on the hydrology, hydrogeology and ecology of water bodies.’ In early 2024, after intervention from the OEP, NIEA (the organisation responsible for regulating water abstraction in NI) agreed to an [action plan](#) to progress to effective implementation of the necessary regulatory regime. We recommend that concluding all of the ‘outstanding’ actions within this plan should be a priority recognised in the Nature Recovery Strategy.

In addition to the comparison with Ireland in relation to river barriers work, there are broader cross-border considerations in the freshwater context. We feel that the strategy needs a much greater degree of consideration given to the need for cross border cooperation and coordination. Not only is this a legal requirement for cross-border river basins under the WFD, but cooperation is also needed around invasive species, chemicals, and nutrient pressures on a cross border basis.

Marine-specific Issues

Blue Carbon Action Plan 2025 - 2030 (BCAP) and other Nature-Based Solutions (NbS)

There is a mandate for the inclusion of NbS under the Climate Change Act, highlighting that NbS need to be part of the solution and this should be factored into at both land and sea. Utilising opportunities through the Nature Recovery Network partnerships, this can take into account available opportunities within the marine environment such as blue carbon habitats – shellfish restoration, saltmarsh, seagrass, coastlines and seagrass habitats which are facing major declines.

To better understand the value of our marine environments as highlighted under the BCAP, it is important that we gain a greater understanding of the natural capital of restoring already degraded habitats to their fullest. The BEACH Tool under the NI Marine Natural Capital (NI MANACA) Report (2023) highlights an indication of what this value could be and can be applied depending on relevant features within each location.

NIMTF has highlighted the ecosystem services which can be gained from preserving, maintaining and restoring existing marine habitats, but in the Habitats Regulations Overview Report 2019-2024 (2026) showcasing that only 4 out of 18 marine and coastal habitats are in “Favourable” condition, means that these ecosystem services are being undermined and not effective as they could be. Actions within the BCAP, twinned with the reviewed MPA Strategy for the Northern Ireland Inshore Region 2025-2030 will be imperative to ensure that we are addressing identified issues not only for our protected sites but also for those connected areas which fall outside of the existing network, but form equally vital

nature recovery networks and corridors. This should be carried out in conjunction with freshwater environments to ensure that a robust “source-to-sea” approach can be taken.

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 Wildlife, 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

MPA Network and Management Plans

As it currently stands, the existing MPA Network forms the basis of meeting the majority of the actions contained within the Environmental Improvement Plan (EIP), however it is being undermined by the current unsustainable usage of the existing designated areas, leading to further decline in species and habitats, leading to the aforementioned decline in condition.

Condition assessments in NI for the marine are piecemeal at best, not all occurring within the 6-year timeframe and without a failure analysis to assess whether implemented measures are actually having any robust effect to turn the dial on habitat and species condition. Where condition assessments don’t exist, it is suggested by the OEP that vulnerability assessments should be in place, however these should be regarded as needing further data to be robust – this is the case where the majority of the offshore MPAs have been assessed using vulnerability assessments.

Existing documents such as the Conservation Objectives and the Potential Management Options for each MPA have been already produced for the majority of the MPA Network, meaning that many of the pressures have been identified, but will require political and departmental will to enact the required changes to ensure marine recovery can be feasible. Furthermore, NIMTF have already highlighted the existing threats and pressures in several responses – OEP’s Call for Evidence on the Review of Drivers and Pressures Affecting the UK Marine Environment, Review of Environmental Governance in NI, NIEA’s Call for Evidence on the Impacts on the Water Environment and to the UK Marine Strategy – Part One. Designation without associated management measures being implemented does not equate to protection.

NIMTF have calculated that only 2.7% of the total sea has “management plans” and these relate to both Rathlin Island (European Marine Site Management Scheme) and Strangford Lough (in development by Newry, Mourne and Down District Council) both of which have still developing MPA Management Plans and active steering groups driving the formation of these documents. Within the EIP, it also makes the claim that Conservation Management Plans (CMPs) will be in place for Special Areas of Conservation (SACs) by 2029, whilst the remainder of the MPA Network will

have management plans in place by 2028. In theory, these management plans will be fully in place by 2030, but will require robust and consistent assessment to ensure that any proposed measures have actually been enforced and are having a positive impact (see [report](#) commissioned by the OEP (2025), and DAERA’s [report](#) on the Inshore Marine Protected Area Network 2019 – 2024).

In this document, we have outlined a number of suggested targets/ actions that should be included in the Nature Recovery strategy. We summarise these in the table below. We highlight that additional analysis, and assessment will be required to determine appropriate timelines for some of these targets/ actions. In addition, we note that this is not an exhaustive list, and that effective integration is required across existing plans and strategies to ensure meaningful change for our water environment. For example, the NRS should make reference to the need to implement actions within the 4th River Basin Management Plan 2027 – 2032, with the aim of increasing the number of water bodies at ‘good’ ecological status by the end of the lifetime of that plan. We suggest a target of 50% of water bodies. The reduction of pressures on the water environment will also, clearly, require action on nutrient pollution coming from both agricultural and wastewater sources. The NRS should clearly state the target of full implementation of the Nutrients Action Programme, as well as development of a funded plan for upgrading wastewater infrastructure with binding targets for pollution reductions.

Target/ Action
By 2028 carry out an assessment of number and location of problematic river barriers to inform an appropriate target and timeline for restoration of NI rivers to a free-flowing state.
Complete AMR and pathogen mapping for all major water bodies.
Deliver cross-border nutrient and chemical monitoring framework.
Development of Pond Restoration Action Plan.