

Northern Ireland's Nature Recovery Strategy (NRS) – Joint High Level Points from eNGO Working Group

Northern Ireland faces a profound and accelerating nature crisis. The virtual collapse of Lough Neagh, the widespread failure of water bodies to reach Good Ecological Status, the decline of priority species, and the degradation of habitats across land and sea demonstrate that environmental decline is no longer an abstract concern, it is a reality affecting all people and the credibility of governance. The evidence is unequivocal: without decisive, coordinated, and long-term action, Northern Ireland will continue to lose the natural systems that underpin our wellbeing, economy, and resilience.

It is also essential to recognise the immense value of nature itself. Healthy ecosystems provide services that are fundamental to society, such as clean water, flood protection, carbon storage, pollination, recreation, cultural identity, and mental and physical wellbeing. Thriving nature represents a core component of Northern Ireland's natural capital, supporting economic productivity, community health, and long-term environmental security. The future costs of continued decline in the state of our natural environment, both direct and indirect, far outweigh the investment required to protect and restore these systems.

A new Nature Recovery Strategy is a legal requirement and is urgently needed. We strongly support the intention behind this work and recognise the effort that has gone into producing the draft and acknowledge the inclusion of several important actions in the draft strategy. However, for the Strategy to succeed, we believe it must be strengthened in several key areas.

1. A stronger commitment to legal targets, recognising that Northern Ireland is now the only area of the UK without a legal binding commitment to nature recovery. Ireland is also developing a National Nature Restoration Plan under the EU Nature Restoration Directive. Northern Ireland cannot deliver nature recovery without a firm legal foundation. This strategy should establish a framework for setting legally binding, timebound and measurable targets aligned with the Environmental Improvement Plan, the Climate Change Act, and the Kunming–Montreal Global Biodiversity Framework (GBF). The Strategy should reflect the GBF targets more broadly and seek to achieve a more comprehensive suite of these through its targets and actions. '30by30' is highlighted in the draft strategy as being the GBF's apex target, however, 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.

2. Ensuring full integration of existing strategies and delivering action plans, the Nature Recovery Strategy must recognise that many of the actions already underway across government, NGOs, local authorities, and communities are strong, well-intentioned, and impactful. However, they have not previously been presented as a unified programme with a clear statutory foundation, measurable outcomes, or a long-term delivery architecture. The Strategy needs to be strengthened as an overarching framework bringing together the Environmental Improvement Plan, Climate Change Act, Marine Strategy, Peatland Strategy, Pollinator Plan, Nutrient Action Plan, and other statutory frameworks. This strategy must bring them together, strengthen them, identify gaps, and set out a clear route map for delivery, supporting and accelerating the active restoration of nature.

It is important to note that the current draft does not fully address several of the most significant pressures and drivers affecting nature recovery, including nutrient enrichment, land-use change and increasing pressure on natural resources. These issues are addressed within existing plans and regulatory frameworks, but despite being listed in Annex A, they are not yet meaningfully integrated throughout the draft Strategy itself.

3. A reorganisation of current actions under five redefined strategic objectives; there is a need to re-organise, at times, disconnected actions into a clearer and more logical structure. This is more than simply moving actions under different headings, the reorganisation helps identify overlaps, gaps, and complementary actions, and ensures that the overall framework is complete, balanced, and strategically coherent. In effect, the revised objectives move from a list of activities to a genuinely strategic, evidence led programme for nature recovery. Additionally, this reorganisation highlights obvious gaps, for example, the omission of key habitats, and ensures these omissions can be addressed within a coherent strategic framework.

Original Objective in Draft Strategy	Proposed Updated Objective
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 Government, Society, and the Economy

4. Longer planning horizon, 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.

5. Strengthening Actions and Indicators and Ensuring Measurable Delivery with actions that are Specific, Measurable, Achievable, Relevant and Time-bound (SMART). Passive or ambiguous language should be replaced with clear, active commitments that specify what will be delivered and by when. The Strategy should be future focused and should not include actions that are backdated or indeed already completed; the Strategy must be ambitious and build on the existing efforts.

A critical weakness in the draft Strategy is the absence of clear measurable indicators for many actions. Without defined measures of success, it becomes impossible to evaluate progress, identify where delivery is falling behind, or to intervene early when outcomes are not being achieved. To address this, the Strategy must include a firm commitment to develop success criteria for every action, supported by a structured review cycle within the strategy's lifecycle, which is key to assess the barriers to success and more importantly to adapt to these to ensure delivery.

6. Sufficient Long-Term Funding / Costed delivery plan; the Strategy must include a credible model for long-term funding to enable its objectives to be delivered. A delivery plan should be fully costed to meet the targets throughout the life of the Strategy and beyond. Restoring nature is a long-term endeavour and, as outlined above, delivers significant economic and societal benefits. To realise these benefits, a realistic and sustainable financial model is essential. Without this foundation, the Strategy's ambitions cannot be translated into effective delivery, and its long-term objectives will remain out of reach.

7. Whole Government/Cross-Departmental Approach 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.

8. Governance – Nature Recovery Forum – oversight role and independent chair; for any strategy to succeed there must be clear structures for monitoring, review, and oversight. To enable this a 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.

NIEL Working Group Responses to the Draft Nature Recovery Strategy

NIEL Sustainable Agriculture Policy (SAP) Working Group

The SAP Working Group welcomes the ambition of the draft Nature Recovery Strategy and its recognition of the scale and urgency of biodiversity loss. However, as outlined above, in its current form it lacks the delivery architecture, investment realism and agricultural integration required to halt biodiversity decline. Without these core elements, the Strategy risks remaining aspirational rather than actionable.

The document reads largely as a compilation of existing initiatives rather than a coherent delivery framework. The significant overlap between strategic objectives, combined with the absence of clear differentiation, risks diluting accountability and makes it difficult to understand how actions will collectively drive recovery.

To be effective the strategy must clearly articulate the pathway from pressures (including habitat loss) to interventions to outcomes. At present, there is insufficient clarity on what will be delivered, by whom, by when, and at what scale. The absence of SMART targets, delivery leads and funding clarity undermines confidence that the strategy can drive the systemic change required.

Scale of Investment

Critically, the strategy does not yet reflect the scale of investment required. The independent Scale of Need (<https://www.wildlifetrusts.org/sites/default/files/2024-07/Scale%20of%20Need%20Report%20July%202024%20FINAL.pdf>) analysis demonstrates that delivering environmental recovery will require a step change in funding, with investment needing to increase by at least an order of magnitude compared to current levels, particularly across farmed land where the majority of environmental outcomes are likely to be delivered. Moreover, projects supporting nature recovery require longer-term commitments e.g. Nature Recovery Partnership and Pollinator Plan. Without acknowledging this funding reality, the strategy risks setting ambitions that are either lacking in scale and ambition, or not financially credible. Detail on how actions would be prioritised is required.

Reducing Pressure from Agriculture

Given that over 70% of NI's land area is managed for agriculture, the strategy must more explicitly position agricultural policy as central to delivery. In the ambition for NI's nature recovery, agri-environment schemes such as Farming with Nature are consistently denied the level of importance they deserve both strategically and financially. Stronger integration is needed across nutrient management, land use planning and agri-environment schemes.

Reducing pressures (Strategic Objective 3) through robust nutrient management and investment in nature-friendly farming systems must be core pillars rather than implicit assumptions. Under SO1, expansion of the protected area network should be considered as a critical action.

SAP reiterates its strong support for site-based approaches such as Site Nitrogen Action Plans (SNAPs) as practical mechanisms to address ammonia impacts on protected sites. These approaches provide a clear model linking evidence, regulation and targeted action and should be explicitly recognised as key delivery tools.

Integrated Approach

The strategy would also benefit from recognising that its objectives are inherently interconnected. Biodiversity recovery, climate action, sustainable food production and land use planning are part of a single system and should be presented as such to avoid fragmented delivery.

The UK Government has recently published a report entitled [*Global biodiversity loss, ecosystem collapse and national security*](#) that concludes that ecosystem degradation and collapse pose a serious threat to UK food security, economic stability and international security further highlighting that sustainable agriculture is fundamental to long-term economic and environmental stability. Delivery mechanisms for sustainable agriculture must include well-resourced agri-environment schemes, support for farmer clusters and catchment initiatives, and stronger mechanisms to leverage private and blended finance alongside public investment.

Scaling Up Existing Successful Initiatives

We would also highlight the importance of recognising and scaling successful initiatives already being delivered on the ground. Locally led partnerships and catchment-scale projects are demonstrating effective models that should be embedded within the strategy as long term and scalable. It should be noted under SO1 that the 'NI Species Recovery Partnership' is not a government strategy or policy but an eNGO-led and funded project development with NIEA partnership).

DAERA's consultation with NI eNGOs on all-Ireland initiatives such as the Pollinator Plan should continue to improve to access local expertise.

On mainstreaming, biodiversity needs to be treated with parity to carbon reporting across government policy and supply chains. The increasing use of biodiversity baselines and audits presents an opportunity to embed nature into decision-making, provided adequate support and standards are established.

SAP supports the inclusion of evidence and knowledge as a strategic objective but recommends stronger commitments to transparency and open data to support targeting, accountability and collaboration.

Role of Farmers in Delivering 30x30

Given that we are only 4 years away from the 30x30 target date, the Strategy should include a mid-point summary of progress and status. Achieving 30x30 in Northern Ireland will depend

fundamentally on the active participation of farmers and land managers, given the dominance of agricultural land within the landscape. The strategy should more clearly articulate the role of the farming sector as a delivery partner rather than treating protected areas and wider countryside measures as separate domains.

There is a particular need to strengthen support for land within existing designations, including ASSIs and other protected sites, where many landowners currently face constraints without sufficient access to advice, investment or long-term incentives. Improving the condition of existing designated sites represents one of the most immediate and cost-effective opportunities to contribute towards 30x30 outcomes.

Enhanced advisory support and appropriately scaled funding are essential to enable farmers to deliver nature-positive management within these areas. Without a clear incentive framework, there is a risk that designations are perceived primarily as regulatory burdens rather than opportunities for partnership delivery. Failure to adequately fund designated land risks undermining confidence in future designations and weakening the foundation for expanding the protected area network.

The strategy should also explicitly recognise the role of Other Effective Area-Based Conservation Measures (OECMs) as a complementary mechanism alongside statutory designations. OECMs provide a critical pathway to recognise high-quality nature management on working land and can help broaden participation in 30x30 where statutory designation may not be appropriate.

Removing barriers to both statutory and non-statutory approaches will be essential. This includes improving clarity around pathways to designation, ensuring adequate support mechanisms are in place, and providing confidence to land managers that participation will be supported rather than penalised.

A successful 30x30 framework must therefore focus on improving the condition and management of existing sites, creating positive incentives for participation, and enabling a wider network of nature-positive land through both ASSIs and OECMs.

Summary of Key SAP Asks

To align the strategy with the scale of ambition required, the SAP Working Group recommends that the final strategy should:

- Establish a clear delivery framework setting out strategic outcomes, tactical actions, responsible bodies and timelines
- Introduce measurable SMART targets for biodiversity recovery, including clear milestones and monitoring mechanisms
- Explicitly recognise the findings of the Scale of Need report, acknowledging that environmental delivery requires investment to increase by an order of magnitude
- Provide transparency on funding and scale, including indicative budgets and how investment aligns with delivery priorities

- Position agriculture as central to delivery, with clear integration of nutrient management, ammonia reduction and agri-environment policy
- Embed Site Nitrogen Action Plans (SNAPs) as a core mechanism for addressing site-based pressures and improving protected site condition
- Strengthen the role of nature-friendly farming, supported by adequately resourced schemes, farmer clusters and catchment approaches
- Recognise farmers as central delivery partners for 30x30 across working landscapes
- Increase advisory support and funding for land within existing designations to improve condition and incentivise participation
- Remove barriers to statutory designation and OECM recognition, providing clarity, support and confidence for land managers
- Develop a clear framework for OECMs to recognise high-quality management on working land
- Recognise and scale existing successful projects, ensuring locally led initiatives are supported as part of the delivery model
- Ensure biodiversity is mainstreamed alongside carbon, avoiding carbon-only approaches and supporting biodiversity baselines
- Improve data transparency and access to enable better targeting, accountability and collaboration

Landscapes NI

Landscapes NI welcomes and recognises the need for a Nature Recovery Strategy and scale of the biodiversity crisis in Northern Ireland. We also welcome the intent to convene a Nature Recovery Forum and the reference to actions such as a Protected Sites Delivery Plan and All-Ireland Pollinator Plan.

However, we believe that the strategy lacks a landscape level framework for delivery, despite landscapes being the scale at which nature needs to recover and where people and nature connect. Landscape management bodies also facilitate the collaboration between land and water uses, communities (including communities of interest), local and central government authorities, businesses and other ENGO organisations. The strategy relies heavily on process (new forums, plans, reviews) rather than committing to specific, time-bound, resourced actions that will change outcomes on the ground by 2030.

The plan still does not include a clear pathway to 30x30 nor to restoring the poor conservation status evidenced in DAERA's own reports.

In accordance with our landscapes manifesto, we would like to see landscapes at the heart of delivery. There is an opportunity to embed a landscape-scale delivery mechanism (through

AONBs, UNESCO Geoparks and other “iconic landscapes”) with defined roles, place-based targets and multi-year core funding to coordinate stakeholders, projects and monitoring.

There is a need to change high-level ambitions into time-bound, quantifiable, funded targets for habitat condition, extent and connectivity, species recovery and community access aligned with 30×30 definitions of effective protection and management.

There is also a need to change the focus from “a plan about plans” to actions, associated budgets and responsibilities that integrate EIP commitments, climate action and people’s access to nature at landscape level.

Landscapes NI notes that landscapes are where delivery happens and members are already actively convening and building cohesion and capacity with land managers, communities, councils, businesses and other NGOs. With stable and allocated core funding aligned with clear mandates, these bodies can coordinate multi-partner nature recovery at the appropriate scale. Landscape organisations are therefore well-placed to integrate nature recovery with sustainable land use, restorative farming, climate resilience, access to nature, heritage, and regenerative tourism, mirroring the *joined-up* approach called for in our Manifesto.

The proposed Nature Recovery Forum is positive but risks adding process without delivery capacity. Landscape management organisations should be resourced as formal delivery partners in the strategy, with appropriate multi-year funding.

We propose the strategy includes the resourcing, creation and implementation of Landscapes Level Nature Recovery Plans (LLNRP) for each designated/iconic landscape area, co-produced with land managers and communities, and approved by DAERA that tie into existing landscape management plans. Each LLNRP could include:

1. Mapped Priorities & Baselines: Priority habitats, species strongholds, connectivity gaps, climate vulnerabilities; baseline condition and pressures (ammonia, nutrients, wildfire risk).
2. SMART Targets:
 - Habitat condition/extent (e.g., #ha peatland re-wetted; #ha species-rich grassland restored; #km riparian buffers).
 - Connectivity (coppices and woodlands, riparian buffers, hedgerow networks, road-verge pollinators area etc.).
 - Priority species recovery plans with population/occupancy metrics.
 - Safe, sustainable and inclusive access
 - Community and societal engagement and youth participation targets.
3. Actions & Budgets: Costed work packages, named leads (e.g., landscape body + council + farmer groups), policy levers (e.g., ammonia reductions, planning policy alignment), and annual milestones.

4. 30×30 Contribution: Area within the landscape that qualifies for 30×30 in 2026 and year-on-year uplift through improved management, OECMs, and new designations where appropriate.
5. Monitoring, Reporting and Verification (MRV) aligned to the EIP to include common and agreed indicators, open data, citizen science components, and independent audits on condition.

The Strategy needs to set a clear pathway to 30×30 outlining clearly what “counts,” baselines for effective conservation, and annual increments to 2030. There is therefore a need to publish a Northern Ireland 30×30 definition clarifying qualifying categories (including Other Effective area-based Conservation Measures), condition thresholds, and a map-based baseline; then set annual percentage-point increases to 2030, with landscape contributions identified.

The Strategy significantly underplays access to nature, outdoor recreation infrastructure, and cultural heritage as enablers of recovery and stewardship. The Landscapes NI Manifesto identifies modernised outdoor access policy, community engagement and regenerative tourism as essential to make recovery truly embedded in broader society.

Two of our members operate on a cross-border basis and this is also the case for Lough Foyle and Carlingford Lough. The Strategy should explicitly support cross-border landscape delivery where appropriate, using existing partnerships and programmes.

Fundamentally the strategy should recognise the need for multiyear core funding to landscape bodies to coordinate LLNRPs and deliver projects in like manner to National Landscapes (formerly AONB’s and National Parks in GB) and as highlighted in our Manifesto.

Draft response to DAERA’s Nature Recovery Strategy consultation

Northern Ireland Environment Link - Nature and Environmental Protection Working Group

Deadline for submission (extended): 15th April 2026

Response coordinated by Chris McAteer (NEP Chair)

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Overarching comments on the draft Nature Recovery Strategy

Lack of ambition and urgency

The draft Nature Recovery Strategy does not yet demonstrate the scale or pace of action required to halt and reverse biodiversity loss in Northern Ireland. Despite welcome language on ambition, the resulting targets and actions fall significantly short of what is needed to address the severity of the nature crisis, risking a repeat of the failures of the 2015–20 Biodiversity Strategy.

Over-reliance on plans rather than delivery

A core weakness of the draft Strategy is its reliance on developing further plans, strategies, reviews and consultations, rather than committing to action on delivery that is properly costed. Two thirds of the proposed new actions relate to process rather than implementation, even though the drivers of biodiversity loss and the actions needed to address them are already well understood.

Absence of SMART, outcome-based targets

The majority of targets and actions are not Specific, Measurable, Achievable, Relevant or Time-bound (SMART). The Strategy also conflates actions with targets, creating confusion about what outcomes DAERA actually intends to achieve. It is also very concerning that there are a lack of clear outcome-based targets. Success will require SMART targets for species abundance and habitat condition and extent in particular. Without such targets progress cannot be meaningfully assessed.

The Strategic Objectives

The ordering and framing of the Strategic Objectives weakens delivery

While the five Strategic Objectives are largely reasonable on their own terms, their current ordering and framing do not reflect how nature recovery will be achieved in practice. Recent assessments by the OEP are clear that biodiversity decline in Northern Ireland is being driven primarily by ongoing pressures, particularly nutrient pollution and land-use change. A Strategy that places protection and restoration before the reduction of pressures risks setting objectives that cannot be delivered. Re-ordering the Strategic Objectives so that reduction of pressures comes first would better reflect ecological reality and the urgent need to stop further harm before restoration efforts can succeed.

The Strategic Objectives conflate outcomes, actions and enablers

The draft NRS uses the Strategic Objectives to group a mix of high-level ambitions, specific delivery actions and enabling mechanisms such as evidence, finance and governance. This creates confusion about what each objective is intended to achieve and how success will be measured. As highlighted in the reorganised actions document, the Strategy would be significantly strengthened by clearly separating:

- The outcomes the Strategy is trying to achieve
- The actions required to deliver them
- The enabling conditions such as funding, skills, data and governance that will be needed to support delivery.

Without this clarity, the Strategic Objectives risk becoming descriptive themes rather than drivers of change.

Objectives focused on drivers and pressures would better address the causes of nature loss

A more coherent structure would be to organise Strategic Objectives around the causes of biodiversity loss, rather than policy themes. A drivers and pressure-led approach starting with pollution, land and sea use change, invasive species and climate impacts would align more

closely with the OEP's analysis of drivers and pressures. This would also make clearer how individual actions contribute to reducing pressures and creating the conditions necessary for recovery.

Protection and restoration should follow, with clearer statutory foundations

Well-protected and effectively managed sites must remain central to nature recovery, but the Strategic Objectives should reflect that protection and restoration depend on strong legal foundations, statutory targets and effective delivery mechanisms. The reorganised framework correctly identifies the absence of a clear statutory pathway for nature restoration in Northern Ireland as a fundamental weakness. Elevating this issue within the Strategic Objectives, rather than dispersing it across multiple sections, would improve accountability and signal a stronger commitment to long-term delivery.

Enablers should support delivery rather than compete with it

Evidence, monitoring, funding, skills and governance are essential to the success of the Strategy, but in the current draft they are treated as objectives in their own right rather than as enablers of action. These elements should be explicitly designed to support delivery against clearly defined outcomes, particularly reductions in pressures and improvements in species and habitat condition. Reframing the Strategic Objectives to reflect this relationship would reduce fragmentation and help ensure that enabling actions are targeted where they can have the greatest impact.

Comments on the Strategic Objectives as they appear in the draft Strategy

Strategic Objective 1: Well Protected Nature and Accelerated Restoration

Protected sites must be central with commitments to new designations

Protected sites are explicitly recognised as the cornerstone of nature recovery, yet the Strategy contains no commitment to designating additional sites. This is a critical omission, particularly given statutory obligations arising from the Third SPA Review Phase 2 Report. The Strategy must include SMART commitments to extend the Antrim Hills SPA (including Curlew as a feature) and to designate a Lower Lough Erne SPA, alongside timetabled targets for management planning and delivery.

Delivery plans must commit to implementation as well as development

While the proposed Protected Sites Delivery Plan is welcome, it presently commits only to development. To be credible, the Strategy must explicitly commit to implementing this plan, including named delivery bodies, funding mechanisms and interim milestones tied to improving site condition.

30by30 requires clarity, baselines and action now

The Strategy lacks clarity on how much land, freshwater and sea currently meet the criteria for contributing to 30by30. Given that only a very small proportion of Northern Ireland is believed to

qualify – a recent report suggested as little as 4% – the Strategy must commit urgently to establishing baselines, improving the condition of existing sites, designating new ones, and developing a robust OECM framework aligned with IUCN guidance.

Strategic Objective 2: Reduction of the Pressures on Biodiversity

Failure to address the main drivers of biodiversity loss

Although the Strategy lists several pressures, it does not adequately address the most significant drivers of biodiversity loss identified by the OEP, particularly nutrient pollution, land-use change and habitat degradation. Targets under this objective are too general and will not result in material reductions in pressure without significant strengthening.

Nutrient pollution requires a SMART and cross-cutting response

Nutrient pollution is one of the most significant pressures on biodiversity in Northern Ireland. The Strategy should include a clear SMART target for reducing nutrient inputs, explicitly linked to delivery through the Nutrients Action Programme, wastewater infrastructure investment and nature-based solutions.

Invasive species actions lack credibility and coherence

Proposed actions on invasive non-native species are poorly justified and insufficiently targeted. A focus on reducing ‘widely spread’ invasives by 50% from a 2015 baseline is unlikely to deliver meaningful biodiversity benefits without stronger emphasis on prevention, early detection and rapid response, particularly through strengthened biosecurity.

From river plans to river restoration

The Strategy must commit to tangible, on-the-ground action to restore freshwater ecosystems. This should include practical measures such as restoring spawning gravels, reconnecting floodplains, and removing or adapting barriers that prevent fish migration. Without clear delivery commitments, timescales and resourcing for such interventions, the Strategy will not deliver meaningful improvements in fish populations or wider river biodiversity.

Recognising the role of angling and rural economies

Angling clubs and river user groups are on the ground every day and witness first-hand the degradation of river habitats, declining fish stocks and increasing pressures from pollution and physical modification. The Strategy should explicitly recognise the role these groups play in monitoring, stewardship and delivery, and acknowledge that healthy fish populations are not only vital for biodiversity but also underpin local economies, tourism and rural communities across Northern Ireland. Strengthening rivers is therefore both an environmental and socioeconomic priority, and this should be clearly reflected in the Nature Recovery Strategy.

Strategic Objective 3: Sustainable Use of Biodiversity

Nature-friendly farming must be scaled up significantly

The Strategy recognises the importance of nature-friendly farming but fails to specify the scale, funding or outcomes required to make a meaningful difference. Farming with Nature commitments must be presented as SMART targets, underpinned by sufficient long-term funding and explicitly linked to improving habitat condition at landscape scale.

Sustainable use must go beyond aspiration

Exploring options for biodiversity net gain and fisheries management without defined outcomes does not amount to delivery. Any commitment to biodiversity net gain must go beyond maintaining the status quo and include a clear pathway to implementation across terrestrial, freshwater and marine environments.

Strategic Objective 4: Nature Valued and Mainstreamed

Voluntary approaches are insufficient for mainstreaming nature

Encouraging behaviour change and voluntary business initiatives cannot substitute for embedding biodiversity systematically across government decision-making. The delayed implementation of the Environmental Principles Policy Statement and the absence of mandatory reporting requirements significantly undermine the Strategy's ability to mainstream nature.

Strengthen accountability and leadership across public bodies

The Strategy should clearly articulate how public bodies are expected to meet their biodiversity duty and how compliance will be monitored. Mandatory reporting on biodiversity duty implementation should be progressed alongside clear guidance and transparent evaluation of impact.

Strategic Objective 5: Evidence, Monitoring and Reporting

Monitoring and reporting are under-resourced and under-specified

Long-standing deficiencies in biodiversity monitoring in Northern Ireland are acknowledged but not adequately addressed. The Strategy must commit to a properly funded, long-term monitoring framework, including statutory monitoring of protected site condition and annual publication of biodiversity indicators.

Evidence must underpin delivery, not sit alongside it

Investment in research, including through the Climate+ Co-Centre, must directly address clearly identified evidence gaps linked to Strategy outcomes. Data should be publicly accessible and actively used to inform delivery, scrutiny and adaptive management.

Cross-cutting issues

Lack of resourcing and financial transparency

The Strategy does not provide confidence that sufficient funding or capacity exists to deliver its ambitions. A detailed assessment of financial and staffing requirements, including gaps and risks, should accompany the final Strategy and inform the proposed Biodiversity Finance Plan.

Risk of the Strategy becoming a missed opportunity

After a prolonged absence of any biodiversity strategy, the current draft represents a critical juncture for nature in Northern Ireland. Without a significant uplift in ambition, specificity and delivery focus, the Nature Recovery Strategy risks becoming another lost opportunity at a time when nature can least afford delay.

Recommendations for Strengthening the Nature Recovery Strategy

1. Reorder the Strategic Objectives to reflect ecological reality

DAERA should reorder the Strategic Objectives so that the reduction of pressures on biodiversity comes first, followed by protection and restoration. Evidence is clear that restoration efforts will fail unless damaging pressures, particularly nutrient pollution, land-use change, habitat degradation, invasive species and climate impacts, are reduced at pace. Reordering the Strategy would better reflect how nature recovery actually occurs and provide a more credible pathway to delivery.

2. Introduce clear outcome-based targets that align with urgency and scale

The Strategy should include a small number of clear, outcome-focused targets that demonstrate what success looks like for nature recovery, such as improvements in species abundance, habitat condition and ecological connectivity. These targets should be time-bound and measurable and act as shared reference points across the Strategy, rather than relying on a long list of loosely defined actions. Without this clarity, ambition expressed in narrative form will not translate into delivery. References to 30by30 as the apex target of the Global Biodiversity Framework should be removed, with species abundance made the apex target of the Strategy.

3. Shift decisively from planning commitments to delivery commitments

DAERA should significantly rebalance the Strategy away from producing further plans, strategies and reviews, and towards committing to on-the-ground action. Where plans are necessary, they should be explicitly paired with concrete implementation steps, delivery timelines and named mechanisms for action. Nature in Northern Ireland cannot afford further delays caused by an emphasis on process over practical change.

4. Commit explicitly to strengthening and expanding the protected site network

Protected sites should be reaffirmed as the cornerstone of nature recovery, with clear commitments to both improving their condition and expanding the network where required. The Strategy should include specific commitments to progress outstanding statutory designations, alongside timetabled delivery and engagement with land managers. Without this clarity, commitments to meet international targets such as 30by30 will lack credibility.

5. Treat nutrient pollution reduction as a central delivery priority

The Strategy should identify nutrient pollution as a defining constraint on nature recovery in Northern Ireland and respond accordingly. This requires clearer commitments to reducing nutrient inputs to freshwater, coastal and terrestrial ecosystems, and stronger alignment with delivery mechanisms such as the Nutrients Action Programme, wastewater investment and nature-based solutions. Addressing nutrients must be treated as a foundational condition for success across multiple Strategic Objectives, not a standalone issue.

6. Strengthen the scale and certainty of nature-friendly land management

The Strategy should provide greater clarity on how nature-friendly farming and land management will be delivered at sufficient scale to reverse biodiversity decline across the wider countryside. This includes setting clearer expectations for the rollout, funding and longevity of Farming with Nature measures, ensuring they are targeted where environmental need is greatest, and embedding strong links to habitat and species recovery outcomes.

7. Clarify the role of evidence, monitoring and reporting as delivery enablers

Monitoring, data and research should be clearly framed as tools to support delivery and accountability, not ends in themselves. The Strategy should commit to regular, transparent reporting on nature outcomes, particularly the condition of protected sites and progress toward species recovery, and ensure that evidence is actively used to adjust policy and delivery where progress is not being made.

8. Provide greater confidence on resourcing and capacity for delivery

The Strategy should be accompanied by clearer indications of how delivery will be resourced, including staffing capacity, long-term funding and the role of external finance. While recognising wider fiscal constraints, the absence of credible resourcing risks undermining the deliverability of even the most well-designed actions. Increased clarity would strengthen confidence among stakeholders and delivery partners.

9. Strengthen accountability and cross-government ownership of nature recovery

Nature recovery cannot be delivered by DAERA alone. The Strategy should more clearly articulate how responsibilities will be shared across government departments and public bodies, ensuring that biodiversity considerations are embedded into decision-making across land use, infrastructure, planning and economic policy. Stronger ownership beyond the environment sector is essential if meaningful recovery is to be achieved.

10. Ensure the Strategy functions as a living, adaptive framework

Finally, the Nature Recovery Strategy should be positioned as a living framework that is regularly reviewed and updated in light of new evidence and delivery experience. Clear review points, transparency on progress, and a willingness to strengthen actions where outcomes are not being met will be essential if the Strategy is to remain relevant and effective through to 2032 and beyond.

Nature & Environmental Protection Working Group – Additional Comments

The Draft Nature Recovery Strategy also omits two major ecological pressures - artificial light at night (ALAN) and anthropogenic noise. These are well-established drivers of biodiversity decline across terrestrial, freshwater, and marine systems, yet the strategy contains no references, actions or commitments relating to them.

Propose the following be included in the NRS:

1. **Habitat condition:** ALAN and noise should be incorporated into habitat-condition assessments and monitoring. Both pressures alter species behaviour, disrupt ecological processes, and degrade ecosystem function.
2. **Species recovery:** Many priority species in NI are highly sensitive to light and noise (e.g., bats, moths, seabirds, cetaceans). Species-recovery actions should include spectral-appropriate lighting, curfews, shielding, quiet-zones, and marine-noise mitigation.
3. **Protected sites and Nature Networks:** Protected-area management should include dark-sky and tranquillity standards, with buffer-zone controls on lighting and noise. “Dark corridors” and “quiet areas” should be embedded in the Nature Network design.
4. **Planning and governance:** The strategy should commit to integrating ALAN/noise considerations into planning policy, local development plans, and cross-government delivery. NIEA should publish guidance on sensory-environment mitigation.

Additional recommendation:

Add explicit objectives, actions and monitoring indicators for light and noise pollution across all relevant sections of the strategy. Without addressing these pressures, the strategy cannot fully meet its aims of restoring ecosystem function, improving habitat condition, or recovering species.