



## **NIEL Sustainable Agriculture Policy (SAP) Working Group Consultation Response - Nature Recovery Strategy for Northern Ireland to 2032**

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 up 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

**SAP Contacts:**

Peter McEvoy (Chair), Director of Land Management, Ulster Wildlife  
[peter.mcevoy@ulsterwildlife.org](mailto:peter.mcevoy@ulsterwildlife.org)

Jill Montgomery, Area Lead – Agriculture, NIEL  
[jillm@nienvironmentlink.org](mailto:jillm@nienvironmentlink.org)

**Background Notes:**

SAPWG is comprised of representatives from leading environmental organisations with a collective vision for a transformed food and farming system through sustainable land management that:

- ensures nature and biodiversity thrive on our land
- supports farmers and rural communities towards a resilient future
- ensures farming and land use help tackle the climate emergency, and
- provides access to healthy and affordable food for everyone.

NIEL's member organisations manage around 315,000 acres of land in Northern Ireland and work with over 3,000 farmers.