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19 March 2026

cc [Biodiversity.policy@daera-ni.gov.uk](mailto:Biodiversity.policy@daera-ni.gov.uk)

**By email only**

Dear Julie,

**Draft Nature Recovery Strategy for Northern Ireland to 2032**

We welcome the publication of the draft Nature Recovery Strategy for Northern Ireland and I am pleased to submit the comments of the OEP on the draft, summarised below and detailed in the attached annex.

Nature underpins the Northern Ireland economy and the health, prosperity and wellbeing of its people. Yet the natural environment is deteriorating and continues to face unsustainable pressures.

The Programme for Government 2024-2027 and the Environmental Improvement Plan together set out the Executive's commitment to addressing biodiversity loss. For example, the Programme for Government lists 'Protecting Lough Neagh and the Environment' as one of its nine immediate priorities. It also specifies the purpose of the Nature Recovery Strategy 'to ensure Northern Ireland will achieve the Global Biodiversity Framework's aim to halt and reverse biodiversity loss and ensure 30% of land and sea is effectively managed for nature.' The Executive's EIP also contains a Strategic Environmental Outcome of 'thriving, resilient & connected nature and wildlife' alongside actions and targets to achieve this.

Alongside these overarching documents, the Strategy has an important role to play. If well-designed and delivered by the Executive and other public bodies, an effective strategy should drive efforts to halt and reverse biodiversity loss.

This consultation on a draft Strategy is therefore an important milestone. There is much to welcome here. The Strategy recognises the severity of nature's decline and clearly outlines why this matters. It outlines key pressures and drivers of decline, and the wider policy context.

We support the Strategy's mission to 'take urgent action to halt and reverse biodiversity loss to put nature on a path to recovery for the benefit of people and planet by conserving, restoring and sustainably using biodiversity'. There is a high level of ambition in the Strategy, for example to restore ecosystems, reduce the number of species threatened with extinction and increase species abundance, with bigger, better managed and more connected areas for nature. Taken together, this is a powerful statement of intent.

In proposing new actions for nature recovery, the Strategy is a step forward. We are particularly supportive of the objective and actions to mainstream nature recovery across government and to increase the money available for restoring nature.

All that said, we identify several areas for improvement. Foremost is for the Strategy to ensure a step change in delivery of on-the-ground, practical action. At present there is an over-reliance on developing further new strategies and plans, exploring options and carrying out reviews, without the requisite degree of tangible actions for their implementation. Many of the causes of biodiversity decline are well-known and the actions that are needed are well-understood. There is now an urgent need to undertake those actions as quickly and as widely as possible.

We suggest that the Strategy is amended to reflect this need to move from planning and strategic thinking towards delivery and implementation at scale and at pace.

Further, we consider that the Strategy would be significantly strengthened by providing greater clarity on the specific, measurable, ambitious, realistic, and time-bound outcomes that DAERA wants to achieve. At present, in our view, the Strategy conflates targets and actions. This results in a lack of clarity about the outcomes being sought and how they will be achieved.

Our response additionally highlights where greater breadth of attention is needed to address all the key pressures affecting biodiversity. We also identify an inconsistent and potentially confusing approach to collating relevant actions from other documents such as the EIP.

Finally, we consider how the Strategy reflects the findings and recommendations of our report on the implementation of protected site laws and DAERA's response to it. We identify several opportunities to strengthen the Strategy in this regard. Improving the condition and increasing the extent of protected sites are essential tools to achieve nature's recovery.

We set out eight recommendations that identify the specific changes to the Strategy that we consider would bring the greatest benefits.

We hope that you will find our response helpful. We would be pleased to discuss any of the points in our response. We would also welcome further engagement on this matter and offer our wider assistance if that would be helpful.

Yours sincerely



Natalie Prosser  
Chief Executive of the Office for Environmental Protection



## **Annex - Office for Environmental Protection comments on the draft Nature Recovery Strategy consultation**

### **Summary**

This Annex contains the response of the Office for Environmental Protection (OEP) on the draft 'Nature Recovery Strategy for Northern Ireland to 2032: A Proposed Strategy for Halting and Reversing the Loss of Biodiversity' (the Strategy).

We have assessed the credibility, coherence, and comprehensiveness of the proposed actions in the Strategy. In so doing, we have considered the proposed actions as a whole, rather than looking at each strategic objective separately. We have also referenced examples of specific strategic objectives and proposed actions throughout our response.

We have identified four main areas in which the Strategy can be improved to enable the Department of Agriculture, Environment and Rural Affairs (DAERA) and the Northern Ireland Executive to achieve their objectives for protecting and restoring nature:

- There should be clarity on the outcomes DAERA wants to achieve. Outcomes should be SMART (Specific, Measurable, Ambitious, Realistic, and Time-bound).
- The Strategy should provide for a significantly increased level of on-the-ground delivery of practical SMART actions. At present it is largely focussed on developing new strategies and plans, and carrying out reviews, without actions for their implementation.
- All key pressures affecting biodiversity should be addressed. At present, the Strategy does not address all sources of nutrient pollution, and does not address pressures arising from chemicals, aggregate extraction, tourism and recreation.
- The Strategy should be coherent with the Environmental Improvement Plan for Northern Ireland (EIP) and other documents such as the Peatland Strategy.

We also consider how the Strategy reflects the findings and recommendations of our report on the implementation of protected site laws<sup>1</sup>, as well as DAERA's response to it.<sup>2</sup> We identify several opportunities to strengthen the Strategy in this regard.

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<sup>1</sup> OEP (2025) [Review of implementation of laws for terrestrial and freshwater protected sites in Northern Ireland](#).

<sup>2</sup> DAERA (2025) [DAERA Response to the OEP Protected Sites Report](#).

## **1. The credibility, comprehensiveness and coherence of actions**

In line with our approach in our forthcoming assessment of progress towards achieving the EIP, we have considered whether the proposed actions in the Strategy are collectively credible (their development and delivery are effective), comprehensive (they cover the most important issues) and coherent (they work together, alongside other documents, to achieve objectives).

### **1.1 Credibility**

#### *1.1.1 Outcome-based targets*

To be most effective, a strategy should contain targets that set out the SMART outcomes that are to be achieved (we refer to these as ‘outcome-based targets’). These should be the outcomes that will matter most, not just areas that are easy to measure or to improve. Targets to halt and reverse the decline in species abundance would be good examples of meaningful outcome-based targets, that are strongly anchored in the Programme for Government 2024-2027. This states that the Nature Recovery Strategy will ‘ensure Northern Ireland is in line to achieve the Global Biodiversity Framework aim to halt and reverse biodiversity loss.’

The Strategy would be significantly improved if there was greater clarity on the outcomes DAERA seeks. We consider that additional outcome-based targets are necessary to support the Strategy’s mission to ‘halt and reverse biodiversity loss’. This should include targets to halt and reverse the decline in the abundance of species. We note that the Strategy already states that ‘species abundance must increase’ but this is not presented as a SMART outcome-based target.

Species abundance targets could act as apex targets that enable progress to be measured towards achieving the mission and vision, representing the ultimate outcomes being sought. As well as seeking to protect and grow species populations, measures of performance against these targets can act as a proxy measure for the state of the wider environment.

We also consider that greater clarity of outcomes is needed in respect of the Strategy’s strategic objectives (pages 20-30). The Strategy does not distinguish between targets and actions. In each strategic objective it refers to several ‘existing targets within other relevant strategies or policies’. These include both targets (for example, 95% of the features underlying the designation of ASSIs to be in, or approaching, favourable conservation condition) and actions (for example, develop Fisheries Management Plans).

We suggest that SMART outcome-based targets are set for each strategic objective so that progress in achieving them can be measured. These should be presented separately from the list of practical actions that will be taken to achieve them.

For example, Strategic Objective 1 (Well Protected Nature and Accelerated Restoration) could be accompanied by outcomes such as those relating to achieving the two 30 by 30

targets, improving ASSI condition, creating or restoring habitats outside protected sites, and conserving and restoring peatlands.

In relation specifically to freshwater biodiversity, the Strategy references the River Basin Management Plans (RBMPs), the Lough Neagh Action Plan and the Nutrients Action Programme (NAP). However, the section that collates the relevant existing targets (page 21) does not reference the legally binding objectives that have been set for water bodies in the current RBMPs. These require almost all surface water bodies to achieve 'good ecological status' (or 'good ecological potential' for artificial or heavily modified water bodies) by the end of 2027. While there are some exceptions for lakes (including Lough Neagh), these good ecological status or potential objectives have been set for all rivers in Northern Ireland.

In our view, the Strategy should reflect these legally binding objectives and the corresponding importance for nature recovery of taking effective action to improve the state of the water environment in accordance with them. This will include ensuring sufficient reductions in nutrient pollution from agriculture and wastewater, in particular.

We note that the Strategy contains an action to consult on setting targets in law for nature restoration by 2027, and to seek Executive support for this in 2028. While this is welcome, we suggest it should not stop the Strategy clearly outlining the outcomes DAERA wants to achieve. It may then be necessary to update the Strategy once any such statutory targets have been established.

**Recommendation 1:** DAERA should amend the Strategy so that it is clearer about the outcomes it seeks to achieve. This should include:

- (a) Setting SMART targets to halt and reverse the decline in the abundance of species. These could act as apex targets for the Strategy as a whole.
- (b) Setting SMART outcome-based targets for each strategic objective so that progress in achieving the objectives can be measured.

### 1.1.2 *Actions for delivery*

There are just six years to achieve the mission to put nature on a path of recovery and less time to achieve many of the nature targets in the EIP. Success will therefore require a strong focus on delivering practical action that will make a difference on the ground.

We are therefore concerned that while the Strategy contains many actions to develop documents such as strategies, plans and frameworks, or to review, explore options and consult, its attention to practical action is notably limited. We consider that the lack of such practical actions is the most significant shortcoming in the Strategy.

We recognise that, in some cases, there may be a need for a new strategy or review (or similar) on a specific topic. However, we suggest that such actions in the Strategy should

always be accompanied by corresponding actions for the development and, where practical, their implementation.

Many of the causes of biodiversity decline are well-known and the actions that are needed are well-understood. For example, there is a need to substantially improve the delivery of actions that have already been identified to address invasive non-native species (INNS). As detailed in our report on the drivers and pressures affecting biodiversity in Northern Ireland, there is a well-established evidence base for the measures required to prevent and respond to INNS and their consequences on the island of Ireland and across Great Britain.<sup>3</sup> This includes improvements in the detection and recording of invasive species, and the inspection of goods and people, as well as policy and legislative review.

The Strategy contains an action to 'review landscape designations to define the baseline of area which currently meets the 30 by 30 criteria on land and sea'. Three years have passed since the 30 by 30 target was adopted as part of the Global Biodiversity Framework. Less than five years remain to achieve it. Achieving 30 by 30 will require urgent action to increase the area of land that is effectively protected and managed for nature. We also note that the Protected Areas Working Group of the IUCN National Committee UK has already carried out an assessment of more than twenty types of designation of land and sea for biodiversity conservation against the 30 by 30 criteria including landscape designations in Northern Ireland.

We are also concerned that the actions relating to creating new documents or carrying out reviews (or similar), unless accompanied by additional practical measures, will not be sufficient to meet the intentions and requirements of the Wildlife and Natural Environment Act (Northern Ireland) 2011. DAERA has a duty under section 2 of this Act to 'designate one or more strategies for the conservation of biodiversity'. In carrying out that duty, DAERA must also comply with its section 1 duty to exercise its functions to further the conservation of biodiversity. Producing additional documents and carrying out reviews will not achieve the 'conservation of biodiversity' without clear implementation steps.

The Strategy can be further improved by clarifying the link between the intended outcomes and the actions to deliver them. For example, under Strategic Objective 1, it is not clear how the actions proposed will collectively stack up to deliver outcome-based targets such as achieving 95% of the features underlying the designation of ASSIs to be in, or approaching, favourable conservation condition by 2030. Achieving this will require much more than is included in the current list of actions. It is crucial to have clear delivery pathways. Without this, prospects for achieving outcomes will be low.

We suggest that the Strategy is amended to more clearly show how actions will support and stack up to deliver the outcome-based targets. This will make it easier to assess progress and to enable course-corrective measures if progress is off track. It would also enhance transparency and promote greater responsibility and accountability for delivery.

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<sup>3</sup> OEP (2024) [Drivers and pressures affecting terrestrial and freshwater biodiversity in Northern Ireland](#).

All actions should be SMART. However, some of the new actions within the Strategy are not specific or measurable. For example, there is an action to 'undertake a review of other existing legislative provisions, particularly around species, biodiversity and enhancing protected landscapes.' It is unclear what provisions this refers to, why a review is needed, how it will be carried out and what output this will lead to.

It is positive that all the new actions within the Strategy are timebound although we note that some of the actions that have been taken from the EIP are not. For example, no deadline is provided for the review of landscape designations, despite the EIP containing a deadline for a similar action. The Strategy is more likely to succeed if DAERA provides itself and other delivery partners with clear dates, along with specific and measurable milestones and outcomes.

A focus on delivery goes hand in hand with the need for secure, long-term funding. The Strategy notes that actions arising from existing policies (such as the EIP or Peatland Strategy) 'should' receive funding, while new actions depend on business planning.

While we understand that DAERA must work within funding constraints and process, it is equally important to recognise that ecological recovery requires sustained and reliable investment over time. We suggest this should be given more attention in the Strategy. We note that the Strategy pledges to create new funding sources (including from private finance) to address the need for increased support. This will require cooperation and investment from the Executive. In addition, the implementation of actions by public and private delivery partners will benefit from funding and resourcing being established from the outset, rather than being deferred for future determination.

**Recommendation 2:** DAERA should strengthen the Strategy by:

- (a) Providing for a significantly increased level of on-the-ground delivery of the right practical actions, at the right pace and scale, to achieve outcomes. This will require a shift in the Strategy from planning to doing.
- (b) Ensuring that where the Strategy provides for DAERA or others to produce new or updated strategies and plans, or carry out reviews (or similar), there are associated timelines for their completion and actions for their implementation.
- (c) Ensuring that the actions clearly relate to outcomes and stack up to achieve them.

**Recommendation 3:** DAERA should produce and publish an assessment of the resource requirements (including funding and staff) that will be required to successfully implement the actions and achieve the outcome-based targets in the Strategy and the adequacy of current resourcing. Where there are shortfalls, DAERA should assess the implications and determine how these should be addressed.

### 1.1.3 Supporting delivery by public bodies subject to the biodiversity duty

The Executive has committed in its Programme for Government and EIP to protecting the environment. This underpins wider ambitions including the growth of a sustainable economy and a prosperous future for society.<sup>4</sup> Delivery of commitments relating to nature requires significant action by public bodies including departments, executive agencies and district councils. This reflects the division of responsibility for policy areas, across geographic remits and the public ownership of land.<sup>5</sup>

This shared responsibility is set out in public bodies' biodiversity duty under section 1 of the Wildlife and Natural Environment Act (Northern Ireland) 2011. This is a duty for public bodies, in exercising any functions, to further the conservation of biodiversity so far as is consistent with the proper exercise of those functions.

We welcome that the Strategy seeks to achieve greater support for nature recovery from across government and public authorities. To this end, the Strategy includes several actions including to 'consult upon a mandatory requirement to report on the implementation of the Biodiversity Duty.' We suggest that the Strategy could be further improved by drawing public bodies' attention to their legal duty under section 1(2) of the Wildlife and Natural Environment Act (Northern Ireland) 2011 to have regard to the Strategy in complying with their biodiversity duty, and by explaining how they should do so.

The Strategy is also an opportunity to assign actions to specific public bodies, setting out the measurable and timebound steps they will need to take to comply with their biodiversity duty and play their part in the effective delivery of the Strategy.

The Executive as a whole and all relevant public bodies should demonstrate leadership. For example, the Strategy should set out what action will be taken by the Forest Service (an executive agency within DAERA). The Forest Service is a major landowner and will need to make a significant contribution if targets such as improving ASSI condition are to be met.

We welcome the Strategy's recognition of the important role for the Environmental Principles Policy Statement (EPPS) in ensuring that the natural environment is considered in policymaking. We note that the legal duty to have due regard to the EPPS has not yet taken effect. However, we would encourage DAERA and other departments to apply the

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<sup>4</sup> Northern Ireland Executive (2025) [Programme for Government 2024-2027 'Our Plan: Doing What Matters Most'](#).

<sup>5</sup> We explain the importance of action by public bodies to improve the condition of protected sites in: OEP (2025) [Review of implementation of laws for terrestrial and freshwater protected sites in Northern Ireland](#).

EPPS voluntarily, ahead of this legal duty taking effect. This would allow the benefits of the EPPS, as outlined in the Strategy, to be realised sooner.

**Recommendation 4:** DAERA should amend the Strategy so that it:

- (a) Draws public bodies' attention to and explains their legal duty under section 1(2) of the Wildlife and Natural Environment Act (Northern Ireland) 2011 to have regard to the Strategy in complying with their biodiversity duty.
- (b) Where appropriate, assigns actions to specific public bodies.

## 1.2 Comprehensiveness

The natural environment is subject to a range of pressures including land use change, pollution (including from nutrients), resource use and extraction, climate change and INNS.<sup>6</sup> All significant pressures will need to be addressed to achieve nature's recovery.

While the Strategy sets out actions relating to several important pressures, we find that some are not accompanied by actions in the most important areas (for example, INNS). Other pressures are only partially addressed, such as nutrient pollution, while some issues – including chemicals, aggregate extraction, tourism and recreation – are not addressed at all. Below, we discuss examples of each of these three categories.

### 1.2.1 Pressure identified but not accompanied by actions in the most important areas

Where the Strategy addresses a pressure, it is not always clear that the proposed actions comprehensively cover the issue. For example, the action to 'take steps to reduce coverage of widely spread invasive species by 50% from the 2015 baseline' is welcome but the phrase 'take steps' should be clarified with more tangible information on actions.

Effective INNS management requires prioritisation of prevention, followed by early detection and rapid response, and then long-term management. This follows the hierarchical approach of the Convention on Biological Diversity. Having additional actions that specifically address prevention and rapid response would improve the comprehensiveness of the Strategy in addressing this pressure.

We welcome the action to develop an All-Ireland Invasive Species Management Plan and associated measures through a Shared Island Invasive Species and Biosecurity Initiative, as this reflects the transboundary nature of INNS. The action to develop a new Invasive Species Strategy for Northern Ireland provides an opportunity to reinforce the value of All-Ireland alignment and coordination.

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<sup>6</sup> OEP (2024) [Drivers and pressures affecting terrestrial and freshwater biodiversity in Northern Ireland](#).

### 1.2.2 *Pressure only partly addressed*

Some pressures are only partly addressed. Sources of nutrient pollution, for example, are not comprehensively considered. Our report on the drivers and pressures affecting biodiversity in Northern Ireland<sup>7</sup> identified nutrient pollution as the primary threat to nature. Northern Ireland currently faces an unsustainable nutrient surplus, necessitating immediate government prioritisation of efforts to control nutrient pollution arising from agriculture and wastewater. Without urgent action to address this problem, biodiversity recovery will remain out of reach. We are concerned that the Strategy only partially addresses nutrient pollution, including ammonia emissions.

The ongoing delays in publishing the Ammonia Strategy and the revised NAP are significant obstacles to nature restoration. However, the publication and delivery of both strategies also represent important opportunities to address agricultural nutrient emissions effectively.

The current draft Ammonia Strategy<sup>8</sup> proposes a target that aligns with the UK's National Emission Ceilings Regulations 2018, aiming for a 22% reduction in ammonia emissions from 2022 levels by 2030. While this would help Northern Ireland meet its share of the UK target, it is unlikely to reduce ammonia concentrations below critical thresholds in all sensitive habitats.

Additionally, the draft Ammonia Strategy includes a 2050 target to reduce emissions further, ensuring that critical loads and levels are not exceeded at designated sites. It is essential that DAERA considers how these timelines and targets align with its proposed actions in the Nature Recovery Strategy.

Both the draft NAP<sup>9</sup> and Ammonia Strategy advocate for spatially focused measures in specific areas, with enhanced interventions to address nutrient emissions. This approach is crucial for effective nature restoration, as it recognises the spatial variability in agricultural pressures and the varying degree of nutrient impact on individual habitats and species. The importance of a spatially explicit approach should be clearly outlined in the Nature Recovery Strategy.

Addressing nutrient losses from agriculture must be matched by equal attention to wastewater inputs. Our investigation into sewage discharges into Belfast Lough underscores the significance of urban wastewater and rural sources – such as septic tanks and small package wastewater treatment plants – which also exert considerable pressure on nature. Implementing nature-based solutions through the Nature Recovery Strategy would mitigate nutrient emissions from these smaller sources while creating new habitats for wildlife.

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<sup>7</sup> OEP (2024) [Drivers and pressures affecting terrestrial and freshwater biodiversity in Northern Ireland](#).

<sup>8</sup> DAERA (2025) [Update on the Proposed Ammonia Strategy](#).

<sup>9</sup> DAERA (2025) [Public Consultation on the Nutrients Action Programme 2026-2029](#).

Tackling nutrients from both agriculture and wastewater is essential for achieving 'good ecological status' under the Water Framework Directive (WFD). In our letter of advice on the NAP in June 2026<sup>10</sup>, we emphasised that getting the NAP Regulations right is critical for DAERA's compliance with environmental obligations, including the Habitats Regulations<sup>11</sup> and the WFD Regulations.<sup>12</sup>

Our report on the WFD Regulations<sup>13</sup> highlighted DAERA's responsibility to set environmental objectives for each water body and to identify specific measures to achieve them. As we noted in Section 1.1.1 above, achieving good ecological status under the WFD, through a spatially explicit approach, is fundamental to delivering on the ambitions of the Nature Recovery Strategy.

### *1.2.3 Pressure not addressed at all*

Chemical sources and pathways create environmental and human health risks<sup>14</sup> but are not addressed within the Strategy. This is an emerging and growing pressure.

DAERA could take steps to address this such as improving monitoring to fill knowledge gaps and providing guidance. Our assessment is that the EIP is largely reliant on steps taken by the UK Government. DAERA should clarify the outcome it seeks to achieve and the associated policy and actions for addressing chemicals as an increasing pressure.

There is also a need for ongoing research to understand pressures and their cumulative effects at the ecosystem scale. We suggest that DAERA should include this within its research and monitoring frameworks (as described in Strategic Objective 5 and the EIP Strategic Environmental Outcome 3).

Further, we consider that Strategic Objective 3 of the Strategy should be broadened to include environmentally sustainable policies and practices for sectors beyond agriculture, planning and fisheries. These include, for example, aggregate extraction (which links to the Department for Economy's Circular Economy Strategy<sup>15</sup>), tourism and recreation.

Extending the Strategy along these lines would support the delivery of broader Executive-wide priorities and commitments. For example, Tourism NI has developed a Sustainable Tourism Pathway Programme and a related toolkit.<sup>16</sup> There should be coherence between such initiatives and the Strategy. This would support action to address the growing

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<sup>10</sup> OEP (2025) [Office for Environmental Protection advice on specific aspects of the Nutrients Action Programme consultation](#).

<sup>11</sup> The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995.

<sup>12</sup> The Water Environment (Water Framework Directive) Regulations (Northern Ireland) 2017.

<sup>13</sup> OEP (2024) [A review of implementation of the Water Framework Directive Regulations and River Basin Management Planning in Northern Ireland](#).

<sup>14</sup> OEP (2024) [Drivers and pressures affecting terrestrial and freshwater biodiversity in Northern Ireland](#).

<sup>15</sup> OEP (2023) [Response to Circular Economy for Northern Ireland Strategy consultation](#).

<sup>16</sup> Tourism Northern Ireland [The Sustainability Toolkit: How to Grow Green](#) and [Sustainable Tourism Business Programme](#).

pressures on nature from tourism and to achieve the Programme for Government's ambitions to 'Grow a Globally Competitive and Sustainable Economy'.<sup>17</sup>

Similarly, in relation to transport (and related planning), Translink has developed a Biodiversity Strategy and Action Plan.<sup>18</sup> This sets targets for nature-positive operations while maintaining a focus on safety and performance. Contained within Translink's Plan is the target of 10% biodiversity net gain by 2035. This relates to the Strategy's proposed action on biodiversity net gain within Strategic Objective 3. DAERA and the Department for Infrastructure (including Translink) have the opportunity to align action on this and other areas of transportation and planning to drive positive change, share insights and avoid the risk of duplicating efforts that could lead to confusion and inefficiencies in the use of resources.

**Recommendation 5:** DAERA should revise the Strategy so that the actions it contains effectively address all key pressures contributing to biodiversity decline.

### 1.3 Coherence

The Strategy states that 'Biodiversity actions contained in other policies and strategies, particularly in the EIP, have been brought together in this draft Strategy.' However, the Strategy does not include all biodiversity actions from other documents. For example, the EIP includes an action to create or commence restoration of 20,000 ha of wildlife rich habitat outside the protected site network by 2030. Yet this is not included in the Strategy.

We also note that where targets and actions from other policies are referred to within the Strategy, they are not always referenced or represented consistently. For example:

- The following is attributed to the Peatland Strategy: 'By 2032: Peatland restoration is significantly upscaled towards meeting 63% of peatlands in Northern Ireland being restored by 2040.' However, we understand that the 63% figure was instead taken from the Climate Change Committee's advice on the Fourth Carbon Budget.<sup>19</sup> It is not included within the Peatland Strategy. The relevant target included within the EIP is 'All semi-natural peatlands are conserved or restored to healthy, functioning ecosystems by 2040.'
- The following is attributed to the EIP: 'By 2026: Continue to work with the Northern Ireland Species Recovery Partnership to deliver on Species Recovery Principles and 35 Species Action Plans to unlock greater long-term action at scale for species.' We could not find any reference to the Partnership or Principles within the EIP.

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<sup>17</sup> Northern Ireland Executive (2025) [Programme for Government 2024-2027 'Our Plan: Doing What Matters Most'](#).

<sup>18</sup> Translink (2024) [Biodiversity Strategy and Action Plan 2030](#).

<sup>19</sup> Climate Change Committee (2025) [Northern Ireland's Fourth Carbon Budget: Advice for the Northern Ireland Executive](#).

- The following is attributed to the EIP: ‘Review landscape designations to define the baseline of area which currently meets the 30 by 30 criteria on land and sea.’ This is different from the EIP’s actions to ‘complete a landscape policy/ legislation review by 31 March 2027’, ‘subject to policy/ legislation review publish a Landscape Strategy by 31 March 2027 and ‘Develop a rolling multi-year Landscape Action Plan by December 2025’.

This leads to a lack of clarity about the status of targets and actions, which may cause confusion amongst delivery bodies and impede effective implementation and monitoring.

**Recommendation 6:** DAERA should ensure that, where the Strategy cross-references targets and actions in other documents, it does so comprehensively and accurately.

Finally, the Strategy notes that the timing of the next strategy ‘if required’ aligns with the third Climate Action Plan for the period 2033 to 2037. This appears to suggest that DAERA may not produce a new Nature Recovery Strategy to replace the current strategy when it expires.

Unless the law is changed DAERA is under a legal obligation to designate a strategy for the conservation of biodiversity.<sup>20</sup> This should be a strategy that is ‘live’, not one that is time limited or expected to expire.

## **2. Actions to address OEP findings and recommendations on protected sites**

In our evaluation of the implementation of laws for terrestrial and freshwater protected sites, we identified that protected sites need to be at the heart of renewed efforts to halt and then reverse nature’s decline.<sup>21</sup> We set out 14 recommendations to help achieve this.

DAERA welcomed our report and agreed that:

‘the governance, framework and strategies for protected sites designation, monitoring, protection measures, management, and provision of data and advice need to be strengthened, with clear plans for delivery of targets, improved implementation, and regular evaluation and review.’<sup>22</sup>

DAERA’s response explained what action it would take to address our recommendations. We set out below an assessment of the extent to which the Strategy addresses the recommendations in our report and DAERA’s response to it.

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<sup>20</sup> Section 2, Wildlife and Natural Environment Act (Northern Ireland) 2011.

<sup>21</sup> OEP (2025) [Review of implementation of the laws for terrestrial and freshwater protected sites in Northern Ireland](#).

<sup>22</sup> DAERA (2025) [DAERA Response to the OEP Protected Sites Report](#).

## 2.1 Governance

We recommended that DAERA should consider proposing legislation to set **statutory targets** for increasing the extent of protected sites and improving their condition. We welcome that the Strategy contains actions within Strategic Objective 4 to ‘By 2027: Consult upon setting targets in law for Nature Restoration and related civil sanctions’ and ‘By 2028: Following consultation, seek Executive support for setting targets in law for nature restoration.’ These steps provide an opportunity to create the recommended statutory targets for protected sites.

We recommended that DAERA should develop, publish and implement **delivery plans** for achieving protected site targets. DAERA is under a legal obligation to establish the necessary conservation measures for Special Areas of Conservation (SACs).<sup>23</sup> Relevant case law clarifies that the measures required must be both identified and implemented.<sup>24</sup> DAERA is also required to take steps to avoid habitat deterioration and species disturbance within SACs and Special Protection Areas (SPAs).<sup>25</sup>

DAERA’s response to our report stated that ‘subject to necessary resourcing, DAERA agrees to develop, publish and implement a protected sites delivery plan’.

The Strategy includes the following action, which is attributed to the EIP: ‘By 2026: Develop and implement nature recovery plans and programmes to secure effective management of our protected sites.’ The Strategy also contains an additional action: ‘By 2026: Develop a Protected Sites Delivery Plan for the stewardship of terrestrial and freshwater protected sites (designation, protection, management and restoration).’

We welcome the additional action to develop a Protected Sites Delivery Plan to cover these matters. However, we note that the EIP and DAERA’s response to our protected sites report stated that plans and programmes would be developed and implemented. In contrast, the scope of the additional Nature Recovery Strategy action is confined to the development of a plan.

We suggest that, notwithstanding the differences in wording, the implicit intention to implement as well as develop a Protected Sites Delivery Plan should be made explicit.

We recommended that DAERA should strengthen its **coordination and oversight of delivery**. This should include clarifying roles and responsibilities, and ensuring that achieving protected site targets is a key consideration for all relevant parts of DAERA, and other relevant departments and agencies. We also recommended the establishment of a group of the organisations that manage the largest area of protected sites, and that the key public authorities should publish and report against protected site targets.

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<sup>23</sup> Regulation 3(1), Habitats Regulations and Article 6(1), Habitats Directive.

<sup>24</sup> C-441/17 Commission v Poland [213].

<sup>25</sup> Regulation 3(1), Habitats Regulations and Article 6(2), Habitats Directive.

DAERA agreed in its response that there is a need for 'stronger governance and oversight involving government departments, public bodies and major landowners to ensure effective protected site stewardship and delivery.' It stated that it would 'consider how best to take this forward to address the findings highlighted by the OEP.'

We welcome that similar points are made in the Strategy. For example, it states that 'If we are to achieve real change in the outcomes for biodiversity, the true value of biodiversity and any potential impact must be considered in the development of policies at all levels of government.' It adds that 'the responsibility for biodiversity conservation applies and is shared across Government and further work is required to ensure that this is fully adopted and embedded.'

We assume that this further work is that described under Strategic Objective 4 (Nature Valued and Mainstreamed Across All of Government and Society). While some of the actions set out in Strategic Objective 4 should help to secure greater action for nature recovery across government, however, it is not clear in the Strategy how DAERA is taking forward the specific recommendations we made in our protected sites report.

In the development and implementation of the Protected Sites Delivery Plan, therefore, it will be important to clearly allocate responsibilities within the Department, especially the division of responsibilities between DAERA policy teams and NIEA, and across government. Establishing a group of the organisations that manage the largest area of protected sites will help to deliver the Plan. Experience in England shows that such a group can facilitate action at scale, collaboration, the exchange of learning and experience and timely feedback to government about key barriers to delivery.

Public bodies have a duty to conserve and enhance ASSIs under article 38 of the Environment (Northern Ireland) Order 2002, as well as duties under the Habitats Regulations. We consider that public bodies that own significant areas of protected sites should lead by example in seeking to deliver the EIP target to improve ASSI condition. This should be reflected in the Strategy.

## **2.2 Resources**

We recommended that DAERA should publish an assessment of the resourcing requirements and the adequacy of current resourcing within the Department and other public authorities to implement protected site laws and achieve targets.

Strategic Objective 4 contains the following action: 'By 2027: Develop a Biodiversity Finance Plan to provide a strategic overview of government and private finance nature-related spending and to increase the amount of money available for nature restoration.' We note that there is a similar action in Strategic Objective 5.

We welcome the intent to increase the amount of money available for nature restoration.

To be effective, this plan should be based on an understanding of what funding is needed to successfully implement the Strategy (including by effectively implementing protected

site laws and targets), and the adequacy of current levels of funding. This would allow the plan to assess the implications of any shortfalls in funding and determine how to address them (see Recommendation 3 above).

The Strategy also states that ‘A review of existing resource structures will also be required to ensure adequate allocation of staff resource to manage and deliver the proposed policies.’ It is unclear whether this review is to form part of the Biodiversity Finance Plan or will be carried out separately. We suggest that this should be clarified. If the review is to be done separately, this should be reflected as a separate, timebound action.

## 2.3 Designation

We recommended that DAERA should restart the designation of protected sites and keep the protected site network under review, alongside improving liaison with landowners in doing so. We drew attention to DAERA’s ongoing legal duties to declare ASSIs<sup>26</sup> and to designate SACs<sup>27</sup> where the relevant criteria are met. We also noted DAERA’s duty to manage, and where necessary adapt, the SAC and SPA network to contribute to the achievement of its objectives.<sup>28</sup>

We did not consider the designation of SPAs in our report due to our ongoing investigation into possible failures by DAERA to comply with environmental law. This relates to possible failures to implement recommendations given by the Joint Nature Conservation Committee on the classification and adaptation of SPAs, and in respect of general duties to protect and maintain wild bird populations. In June 2025, we expanded the scope of this investigation to also include possible failures to comply with environmental law relating to the classification of marine SPAs by the UK Secretary of State for Environment, Food and Rural Affairs.<sup>29</sup> The Secretary of State’s duties currently include responsibility for classifying SPAs within the Northern Ireland inshore region. However, as highlighted in recent Committee evidence, proposed amendments aim to update and clarify this process in line with devolved arrangements.<sup>30</sup>

DAERA’s response to our recommendation stated that: ‘Subject to resources, DAERA accepts this recommendation and will put arrangements in place to consider how best to take forward a terrestrial / freshwater designation programme for ASSIs, SACs and SPAs, which would include periodic reviews.’

The Strategy does not include an action relating to the designation of protected sites other than the action to develop a Protected Sites Delivery Plan, which is stated to address ‘designation’ amongst other matters.

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<sup>26</sup> Article 28, Environment (Northern Ireland) Order 2002.

<sup>27</sup> Regulation 6, Habitats Regulations.

<sup>28</sup> Regulation 8C, Habitats Regulations.

<sup>29</sup> OEP (2024) [Classification and adaptation of Special Protection Areas \(Northern Ireland\)](#).

<sup>30</sup> Northern Ireland Assembly (2025) [Official Report: Minutes of Evidence of the Committee for Agriculture, Environment and Rural Affairs, meeting on Thursday, 20 February 2025](#).

We also note that the Strategy states that ‘The current policy framework has for many years placed a significant reliance on the role of designating sites to protect a representative sample of the best of our biodiversity.’ In our view, this is incorrect.

While there was a time in which ASSIs were to be designated to achieve a representative sample of the best places for nature, more emphasis is also now placed, for example, on the potential value of the site and whether it will contribute to the development of an ecological network.<sup>31</sup> It is therefore no longer accurate to characterise the ASSI series as solely a representative sample. The focus is now much wider for ASSIs. The focus has always been much wider for the designation of SACs and SPAs.

We therefore suggest that the Strategy is amended so that it does not state that protected sites are designated to achieve a representative sample. The designation of protected sites is necessary to fulfil legal duties and to contribute to the development of an ecological network that enables species populations to expand and increase.

## 2.4 Monitoring

We recommended bringing up to date and publishing condition assessments, considering creating a new statutory duty to monitor protected sites, better communicating monitoring results with landowners and working with them to deliver actions.

The Strategy contains the following action in Strategic Objective 1: ‘By 2027: Publish a protected site monitoring framework and associated condition assessments, reporting annually on the condition of protected sites.’

The Strategy could be clearer about what is meant by a ‘monitoring framework’ in this context. This is an opportunity to address our findings and recommendations relating to monitoring, for example to explain how frequently different types of protected site features will be assessed and how the results of monitoring will be proactively communicated to landowners.

We welcome DAERA’s publication of annual reports on the summary feature condition status of ASSIs for 2023/24 and 2024/25, and the statement on DAERA’s website that this ‘will be updated on an annual basis in line with Environmental Statistics Reporting’.<sup>32</sup> However, the Strategy should be clear what will happen differently under this action.

In its response to our report, DAERA accepted that ‘more needs to be done in not only presenting the results of monitoring but also providing tailored ‘packages’ of evidence that can inform action by landowners, Competent Authorities and other relevant actors.’ The response added that ‘NIEA intends to review the information it holds on protected sites’ and ‘will also consider how best to make that information publicly available and how it can

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<sup>31</sup> JNCC (2013) [Guidelines for the Selection of Biological SSSIs: Part 1: Rationale, Operational Approach and Criteria for Site Selection](#), p. 19; DAERA (2009) [ASSI Scientific Survey Selection Criteria](#), p. 4.

<sup>32</sup> DAERA [Protected Areas Monitoring Results](#).

be used to inform communication with landowners.’ The response also stated that, subject to resources, officials will trial new ways to share data with site owners and public bodies.

However, the Strategy does not address the proactive communication of the results of monitoring to owners and occupiers so that it informs discussions about management.

We welcome the action in Strategic Objective 5 to: ‘By 2027: Consult upon taking forward a statutory requirement to monitor and publicly report on the condition of protected sites and to increase the amount of money available for nature restoration.’

However, we note that, unlike similar actions relating to legal nature restoration targets and reporting on the biodiversity duty, there is no corresponding action to seek Executive support for these new statutory requirements.

## **2.5 Land management**

We recommended providing tailored and ongoing advice to owners and occupiers of protected sites. We added that each protected site should have a specified point of contact, supported by a multi-agency and multi-disciplinary team. The provision of high-quality, locally embedded and one-to-one advice increases the uptake and effectiveness of agri-environment schemes. This will be essential if the EIP’s target to improve ASSI condition is to be achieved.

DAERA responded that ‘the Department will undertake a review of existing arrangements to inform the most appropriate avenues and priorities for providing support to deliver site outcomes, in line with the availability of resources.’ However, there is no action in the Strategy to carry out that review or more generally relating to advice.

We also recommended that achieving the EIP’s ASSI condition target should be a key consideration in the development and implementation of the new Farming with Nature schemes. We added that new schemes should build on the successes of the Environmental Farming Scheme (EFS) (notably the Group Level) and improve on areas of weakness.

The Strategy contains an action within Strategic Objective 3 to: ‘By 2027: Launch further strands of the Farming with Nature Package to deliver positive environmental outcomes across all land types in Northern Ireland. This will include: expansion of the current transition scheme, a scheme focussed on protected sites, on priority habitats and species and a landscape scale scheme.’

DAERA can maximise the contribution that further strands of Farming with Nature make to achieving the EIP’s ASSI condition target by ensuring that:

- ASSI owners and occupiers receive expert, locally embedded advice, on a one-to-one basis.

- Farming with Nature agreements include all the actions they reasonably can to conserve, restore or enhance any relevant protected sites in line with sites' conservation objectives.
- Farming with Nature agreements are sufficiently long-term and well-funded to increase uptake and effectiveness.
- Existing farmer cluster groups are supported and new groups are established, building on the success of the EFS Group Level.

We also recommended significantly increasing the scale of the Management of Sensitive Sites (MOSS) programme and providing for long term MOSS agreements. The MOSS programme provides funds for protected site owners and occupiers who are not eligible for agri-environment schemes to appropriately manage their site.

DAERA's response to this recommendation stated that 'NIEA will scope and develop an enhanced MOSS programme, which will include consideration of longer term agreements, and identify those sites and management units that would benefit most from MOSS.' However, there is no mention of MOSS in the Strategy.

If well-designed and delivered, at a sufficient scale, Farming with Nature schemes and the MOSS programme will be important mechanisms not only for achieving the EIP's ASSI condition target but also for implementing the necessary conservation measures for SACs.

## **2.6 Regulation and enforcement**

We made several recommendations to improve regulation and enforcement on protected sites including making improvements to ASSI consenting guidance, increasing monitoring of compliance with protected site laws, using management notices where necessary to secure appropriate management, publishing enforcement activity and considering legislation to make civil sanctions available as an enforcement option. We note that the Independent Review of Environmental Governance in Northern Ireland made a similar recommendation to enable the use of civil sanctions.<sup>33</sup>

In response, DAERA stated that it 'will review and update existing guidance and website content, taking account of feedback from protected sites owners and occupiers.' DAERA would 'review its ASSI Enforcement Policy and compliance framework' and consider opportunities to use management notices where reasonable attempts to negotiate voluntary restoration using management agreements are not successful. DAERA added that NIEA will 'work towards publishing annual reports on enforcement activity under the Environment Order.' On civil sanctions, DAERA accepted the 'need for a toolbox of appropriate compliance and enforcement mechanisms. The introduction of civil sanctions

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<sup>33</sup> Viviane Gravey, Diane Ruddock and John McCallister (2025) [Independent Review of Environmental Governance in Northern Ireland - Final Report](#) (see Recommendation 26).

will be considered as part of the proposed legislation changes identified within the draft Nature Recovery Strategy.'

The Strategy only takes forward one of these recommendations. There is an action to: 'By 2027: Consult upon setting targets in law for Nature Restoration and related civil sanctions.' However, there is no corresponding action to seek Executive support for legislating for civil sanctions (unlike for setting targets in law for nature restoration).

**Recommendation 7:** Where it has not already done so, DAERA should set out in the Strategy its approach to implementing the recommendations in our protected sites report which the department accepted in its response to that report. These points are (quoted text is taken from DAERA's response to our report):

- (a) The publication and implementation of a protected sites delivery plan (the Strategy only refers to its development).
- (b) 'Stronger governance and oversight involving government departments, public bodies and major landowners to ensure effective protected site stewardship and delivery'.
- (c) Taking forward a 'terrestrial / freshwater designation programme for ASSIs, SACs and SPAs, which would include periodic reviews.'
- (d) Proactively communicating 'tailored 'packages' of evidence' from protected site monitoring to owners, occupiers and other relevant parties to inform action.
- (e) Maximising the contribution that further strands of Farming with Nature can make to achieving the EIP's ASSI condition target. This includes reviewing 'existing arrangements to inform the most appropriate avenues and priorities for providing support to deliver site outcomes.'
- (f) Bringing forward 'an enhanced MOSS programme, which will include consideration of longer term agreements, and identify those sites and management units that would benefit most from MOSS.'
- (g) Strengthening regulation and enforcement by reviewing and updating existing guidance on ASSI consenting, making use of management notices where necessary to secure appropriate management and publishing annual reports on enforcement activity under the Environment Order.

**Recommendation 8:** DAERA should ensure the follow-up action to consultation is then to seek Executive support for legislating for civil sanctions.