

Response ID ANON-JBHM-G449-9

Submitted to Draft Environmental Principles Policy Statement
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Introduction

1 What is your name?

Name:
Peter McEvoy

2 What is your email address? (optional)

Email:
peter.mcevoy@ulsterwildlife.org

3 Are you responding on behalf of an organisation?

Yes

If "Yes", Name of Organisation:
Ulster Wildlife

4 If so, which of the following best describes your organisation?

Sector:
Environmental NGO

Background and Purpose of EPPS

5 Do you believe the Introduction, Background and Purpose sections of the draft statement give the reader a good understanding of the aims and objectives of the EPPS?

Yes

Additional Comments:

Ulster Wildlife welcomes the publication of a policy statement on 'Environmental Principles' and recognises the aims and objectives, particularly the integration of environmental principles into all policy making and the continuity of environmental standards post-Brexit.

We understand from the document that the aim is to 'empower ministers and those working on their behalf to think creatively and use environmental principles in an innovative and forward-thinking way'

And the desired outcomes on page 3 summarise the need for policy makers to consider environmental protection, sustainable development, avoidance of environmental damage, mitigation where it is appropriate, application of the 'precautionary and 'the polluter pays' principles.

6 Do you believe the importance of environmental protection and sustainable development is communicated adequately within the EPPS?

Yes

Additional Comments:

We recognise the importance of the Environmental Improvement Plan in informing and delivering targets for application of the Environmental Principles. However, there has been no formal opportunity to consult on this document

A better explanation of the UN SDGs and most importantly how 'environmental protection' and 'sustainable development' link up would be beneficial, especially as most SDGs are dependent or linked to the environment as per the 'wedding cake' model of the SDG's Obrecht A, Pham-Truffert M, Spehn E et al (2020) Achieving the SDGs with Biodiversity. Swiss Academies Factsheet 16 (1)

Understanding the Statement and the Due Regard Duty

7 Is there enough information provided on the due regard duty to effectively assist policy makers to comply with the statement?

Yes

Additional Comments:

The statement defines what the "due regard" duty entails. However, it is unclear if this is to consider the specific environmental principles when developing or revising policy, or to the draft 'Statement'. We would obviously prefer if this due regard was to the specific principles.

It would also be good to clarify at what levels of policy making this applies outside of Government Departments.

The statement offers practical advice on how policymakers should demonstrate their compliance, e.g. keeping records of considerations, and revisiting delivery throughout the policy cycle and we recognise that there are exemptions, which have been clearly stated.

Policymakers would benefit from more examples of how due regard has been applied in policy contexts to demonstrate best practices.

The provision of templates would be helpful in ensuring these tools are applied consistently across different departments.

The Environmental Principles

8 Do you believe the descriptions of the 5 principles and advice for policy makers give adequate assistance to policymakers on how the principles should be applied?

Yes

Additional Comments:

The descriptions are sound, but the inclusion of specific case studies to show how the principles have been applied successfully could assist policymakers further in their application.

Particularly more explicit guidance on how to weigh up environmental, social, and economic factors in challenging scenarios.

If Northern Ireland is to take environmental protection seriously, the application of these principles must be bolstered through the development of both the policy statement and the duty to apply principles.

Monitoring and Reporting etc.

9 Departments will be required to monitor their compliance of the EPPS – do you believe the guidance given in the 'Monitoring and Reporting' section is sufficient?

Yes

Additional Comments:

More examples of reporting and standardised templates to ensure consistency across Departments would be beneficial

10 Do you have any other comments on the draft policy statement which are not covered by the previous questions?

Yes

Comments:

To successfully apply these principles to achieve meaningful environmental protection they should be accompanied by a duty to apply the principles. Ulster Wildlife would therefore support the requirement on DAERA to publish a statement of policy in relation to the application and interpretation of the environmental principles, with input from experts and scrutiny from the Assembly.

There are related considerations to the environment that could be applied in time, such as biodiversity net gain, or current issues such as equality that need to be addressed as part of the decision-making process and these should be acknowledged in any templates for respondents to consider.