

**Response submitted online**

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Dear Sir/Madam,

Please find below our consultation response on the Department of Agriculture, Environment and Rural Affairs' Environment Strategy for Northern Ireland.

**Consultation: 'Environment Strategy for Northern Ireland'**

**EAUC – The Alliance for Sustainability Leadership in Education:**

Response on behalf of our Members (United Kingdom and Ireland)

**About the EAUC**

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £25 billion, responsible for educating over 2 million students supported by half a million staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

**We believe**

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

**Our values**

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice
- Collaboration - together we go further
- Role Model - leading by example
- Empowering - supporting and inspiring our members

**EAUC's Approach to the Inquiry**

Post-16 education plays a crucial role in driving environmental changes – due to its privileged position in influencing the next generation, the geographical land mass that its institutions stretch across and the economic and social power that it wields. We have focused our response to the consultation on the need for a Northern Ireland Climate Change Act, Net Zero Carbon target and action plan, an independent Northern Ireland Environment Agency and better global alignment with the Sustainable Development Goals.

### **Response to the consultation:**

*Q1: Do you agree that the Environment Strategy should sit alongside existing Executive-endorsed strategies, such as the Sustainable Development, Public Health and Economic Strategies?*

Yes. It is crucial that the Environment Strategy sits at an Executive-endorsed level. The Programme for Government for the new executive must place the environment as a priority for action and drive the delivery of the Strategy.

The environment must be a factor that is integrated within any other Executive-endorsed strategy, to ensure coherence and alignment domestically, and the Environment Strategy should be more explicitly aligned to the United Nations Sustainable Development Goals to ensure compliance internationally.

*Q2: Do you agree that these broad environmental areas are appropriate for the Environment Strategy? If “No”, what alternatives would you like to see included?*

Yes – these are appropriate areas and they link well with the broader UK 25 Year Environment Plan.

We are particularly pleased to see the issue of Climate Change placed so highly, however the reference to climate change is understated and has not been given the emphasis it should when looking at the detail provided.

There could be clearer links with health and well being, as it feels this is an area currently overlooked. There should also be an area that looks at the Global environment and what impact Northern Ireland can have on this. The Environment Strategy at present feels fairly inward looking.

The areas outlined interlink well with the UN Sustainable Development Goals, primarily the ‘biosphere’ goals, and it would make sense to make this interlinkage explicit. Though biodiversity should be included in its own area rather than sitting under the heading Natural Environment.

It would also make sense to look in more detail at the SDGs and work out if there are any targets within them that the Environment Strategy should be contributing towards, but is not. [The Office for National Statistics currently tracks data on the UK’s contribution to the SDGs](#) and we would strongly recommend this to be reviewed and integrated into the Environment Strategy where appropriate.

The concept of ‘resource efficiency’ would be better framed in terms of the ‘circular economy’ - to provide a more robust, holistic approach to the management of the environment, which has been lacking to date.

The impact of travel and transport should be included within the Environmental Quality section given the significant impact of transport on air quality and the high dependence cars within Northern Ireland.

The success of the Strategy will be defined by the level of ambition and detail that is associated with these themes. Themes must be tied to very specific, time-bound actions, and assigned to people who can be held accountable for meeting the targets.

*Q3: As described below, do you agree that these are appropriate strategic themes for the Environment Strategy?*

*If “No”, what alternative or additional themes/issues would you like to see in the strategy?*

Members have suggested that as the International Standard ISO 14001 already provides organisations with a systems approach to environmental management, the strategy themes should align. The frameworks used are:

- Leadership/Commitment and Policy
- Risk/Opportunities and Targets
- Communication and Engagement
- Review and Improvement

The strategy should, overall, be much more ambitious than merely to ‘conserve’ our environment. While this is certainly the first step, there should be an additional theme on Environmental Restoration or Recovery.

On a more general point – we are pleased to read that the Environment Strategy aims to ‘properly highlight the importance of the environment, not just in terms of its intrinsic value but also to a wide range of social and economic issues to which it brings significant benefits’ – this should be the case. Long gone are the days in which we think about environmental requirements in isolation, it is common knowledge that ‘sustainability’ is a much more appropriate term, and it requires the careful balance of environment, economy and society. With this in mind, we would question whether the Environment Strategy might be better named with a title that reflects this move away from siloed thinking and towards a comprehensible systems-based approach.

The themes should be clearly aligned with the relevant UN Sustainable Development Goals, and complement the objectives and targets outlined in the goals.

*Q4: Do you have any comments on what specific issues should be included under a proposed Environmental Engagement strategic theme?*

The role of primary and secondary school education is to be admired in this strategy, as is the recognition that there needs to be lifelong learning opportunities on this agenda, however the strategy under-values the role of tertiary education. It is critical that there is more engagement with tertiary education institutions – not only do they wield both financial and geographical power, but they are also responsible for educating and influencing young people at a critical juncture, and undertake volumes of research on these topics. At this age, young people are deciding on the type of people they want to be, on the ethics they hold, on the careers they want to pursue and the skills they deem necessary to be future fit. At present, there is a disconnect between the skills that businesses are looking for in graduates, and the skills that tertiary education providers are teaching young people. They are missing sustainability skills (systems thinking) and sustainable development knowledge. These are the skills that allows students to handle complicated problems with an understanding of interdisciplinary perspectives.

Consumer awareness and purchasing power is increasingly leaning towards ethically-sourced products/services and businesses are finding themselves facing challenges that require resilience and socially-aware ways of thinking. Businesses like Unilever, M&S and Mars all have Chief Executives forcing sustainability to the top of their business agenda – moving away from the idea that it is a ‘nice to have’ these days and reinforcing its position as the foundation for good business. Equally, students want these skills. They value sustainability, ethics and the notion of social responsibility. NUS research shows 3 in 4 students would choose to work for a company that pays less but has a strong environmental and social record. But less than half of post-16 education institutions have sustainability related attributes in the

graduate attributes framework developed by their institution. That's over half of colleges and universities in the UK and Ireland that are not even recognising this as an important skill.

We recommend that Environmental Engagement include tertiary education, and that Education for Sustainable Development and Carbon Literacy education are integrated into the curriculum for all students. Education on these topics should also be included in lifelong learning opportunities and teaching staff should be prioritised. If we are not educating people on these matters and equipping them with the sustainability knowledge and systems thinking skills needed to rethink consumption and production, emissions reduction and climate adaptation, our economic and social systems will fail.

The strategy should look at how our curriculums are embedding the United Nations Sustainable Development Goals into teaching and assessment. Without a core focus and funding available in relation to Education for Sustainable Development it is difficult for educators to prioritise this much needed focus.

Capacity building within industry sectors is also essential. The education sector and the pupils and young people are not the biggest polluters. Industry specific engagement (as the larger/more direct polluters) is required alongside collaboration between industry sectors – this engagement can be delivered in conjunction with third level education providers i.e. we as a sector are teaching and researching multi-discipline approaches to climate problems and are in a good position to help government and primary and secondary education with the engagement piece.

Inclusion of the public within decision making should also be incorporated in this theme, e.g. citizen assemblies, and more publicly available information on climate change and the environment.

*Q5: Do you have any comments on what specific issues should be included under a proposed Environmental Prosperity strategic theme?*

There is merit in the concept of quantifying Natural Capital value – but focus really needs to be on plans/actions to enhance Natural Capital both within private and public sector land holdings. There should also be more of a focus on greening infrastructure to ensure there is a foundation for change.

The theme appears in the document to focus more on economic prosperity rather than environmental prosperity. This theme needs to more strongly support the intrinsic and social values of nature that cannot in some cases be monetised.

'Prosperity' must be interpreted as including the multiple dimensions covered by the 17 Sustainable Development Goals – covering a wide range of indicators, only one of which is specific to economic growth.

Consideration should be given to the use of the UN Sustainable Development goals as a means of determining and evaluating environmental prosperity.

*Q6: Do you have any comments on what specific issues should be included under a proposed Environmental Efficiency strategic theme?*

This section is factually incorrect. This section on Climate Change states 'The Climate Change Act 2008 established a target of reducing UK GHG emissions by 80% from 1990 levels by 2050 and locally, the NI Executive, in its Programme for Government (2011-15), has a target of continuing to work towards a GHG emissions reduction of at least 35% on 1990 levels by 2025' – this does not include the 2019 legislative amendment that changed 80% to 100% by 2050. Updated information on this amendment states: 'The CCC's report noted that in the absence of a Minister, Northern Ireland officials indicated their support for the advice being sought. Northern Ireland does not currently have its own long-term target for emissions but is included within UK targets.' The devolved administrations of Scotland and Wales have differing targets to reflect their circumstance, and as this strategy suggests that Northern Ireland is more akin to

Wales, it might be appropriate for Northern Ireland to similarly set their Net Zero target to be 95% by 2050 and 100% by 2055. However, 80% by 2050 is not considered an appropriate target. This must also be reviewed in light of Northern Ireland's declaration of a Climate Emergency on Monday, 3<sup>rd</sup> February 2020. Northern Ireland should look to set an example for policy in other parts of the UK and around the world. With our relatively small population, it should be easier to achieve higher levels of waste reduction targets. For example, the small, but fairly geographically-confined population, can be used to test policies for issues such as the eradication of single use plastics. It might be easier to educate 1.8 million Northern Ireland people as a test of individual policy than the whole of the UK. Northern Ireland should therefore seek to exceed UK wide targets.

Actions under the theme of environmental efficiency also need to reflect the recent commitment included within the Northern Ireland Assembly agreement to implement a Climate Act in Northern Ireland with legally binding targets.

Given the NI Assembly commitment to a Climate Act, proper consideration should now be given to setting a more ambitious target for Northern Ireland, with a 2030 date for net zero emissions.

The Strategy needs to take account of climate mitigation and adaptation measures.

We like the premise of the circular economy adoption, but the waste hierarchy needs some serious updating. A concept more akin to the UK's overarching 'Resources and Waste Strategy' would be a far better basis for this section.

There are issues surrounding Brexit here, and a lack of environmental protections given Northern Ireland will not have to adhere to the Environment Bill at the moment. As stated at the beginning of this strategy; 'Currently the draft (Environment) Bill applies only to England and to reserved matters across the UK but DAERA officials are currently working with Defra to retain the option for returning Ministers to extend the Bill's provisions to Northern Ireland'. We would recommend that Northern Ireland pushes for this extension. If they do not, they need to ensure they have key principles in place in preparation for Brexit, such as the polluter pays principle – there is currently no discussion of this in the Environment Strategy at all, and little focus on plastics.

There is a mention of the SDGs in the section, which is applaudable, but quite odd, given this is pretty much the only mention of them in the whole strategy. We would again recommend that the SDGs are integrated throughout.

*Q7: Do you have any comments on what specific issues should be included under a proposed Environmental Quality strategic theme?*

This section seems a good idea in concept – air quality and water quality are seen as prevalent issues in the Environmental remit. However, this section is referred in the strategy as the most 'tangible' section to undertake, and there is actually very little tangible about it. There is a lack of action/implementation plans here – and this section is disheartening: 'While traditional regulation and enforcement is undoubtedly important, we, and the local councils who are in the frontline of efforts to improve local environmental quality, recognise the fact that behaviour change requires a range of interventions that include "softer" approaches, including education and awareness-raising'. There must be regulation to ensure systemic and rapid behaviour change. The soft approach is simply not good enough anymore. You can educate and raise awareness in a way the fosters change, it is not a 'soft' approach when undertaken holistically throughout the education system.

*Q8: What do you see as the main environmental governance priorities for Northern Ireland?*

Upon Brexit, it is key that Northern Ireland establish an independent environmental protection agency if they are not to extend the reach of the OEP being established in England. We would suggest in the absence

of the EU Commission and institutions to hold NI (and its population) to account, there is a need to establish, and properly fund an Environment Protection Agency (EPA) for NI. Northern Ireland is currently the only area of these islands (UK and RoI) that does not have an independent EPA and we can see the result in high levels of illegal dumping, the persecution of threatened species, and the poor condition of our protected sites.

The governance of this Environment Strategy is not particularly clear at present, with little action, monitoring, reporting mechanisms or targets discussed. The principles of the Strategy need to be actually enforceable before the courts and must facilitate the courts in interpreting the legislation (as is currently the case). There is also the elephant in the room; funding. How is this being funded?

The new NI Assembly must follow up on their commitment to an NI Climate Act with legally binding targets to cut emissions. This should be a headline measure of the Strategy and a priority for the newly formed Assembly.

DAERA need to consider interim arrangements for Brexit to ensure that environmental standards are safeguarded. Scotland, for example, are taking forward an Interim Advisory Group (in place of EU Commission).

Enhanced North-South co-operation on delivering improvement on shared cross-border and all island environmental challenges on air, water, biodiversity and so on.

*Q9: Do you agree that these are appropriate draft outcomes for the Environment Strategy?  
If “No”, what alternative or additional outcomes would you like to see?*

The draft outcomes are vague – and this makes it hard to determine if they are appropriate or not. They are also not particularly clearly linked to the strategic themes or scopes already outlined.

There is a lack of targets, which means it is difficult to see how feasible and/or aspirational the outcomes are going to be.

Some of the draft outcomes would be very difficult to quantify, and these need clearly defining, for example, this is very vague; ‘Everyone can access and is connected to a healthy environment’. There needs to be more detail about what this actually means.

We would suggest that education is included in one of these outcomes; all citizens should have access to education to ensure sustainable development.

The Strategy must allocate substantial resources to address these outcomes – something which has been somewhat lacking to date. There is a serious need for joined up government thinking and integration with other strategies to deliver on this.

*Q10: What are your big ideas for the future protection and enhancement of the environment?*

The first priority must be protection. At the moment, we are concerned about what will happen to environmental protections in Northern Ireland when the UK leaves the European Union, and Northern Ireland are not included under the Environment Bill which has been designed to ensure the continuation of environmental protections across the United Kingdom.

Northern Ireland must rapidly put environmental protections in place, and ensure there is a method for monitoring and regulating. Once this is in place, Northern Ireland must then look to enhancement and should look to catch up with the rest of the UK on themes including reaching net zero emissions, building green infrastructure and bettering the environment.

Education is key to this – and Northern Ireland should urgently look to ensure the education system is integrating sustainability into its curriculums to guarantee graduates and young people arriving into the workforce at this crucial time have the skills they need to succeed in a world dominated by the issue of climate change. Northern Ireland should also look to align with the SDGs.

Other ideas include:

- Harness the world class knowledge and expertise within the tertiary education sector to develop and deliver the Strategy.
- Establish Northern Ireland as a world leader in the delivery of environmental research and solutions.
- Ensure the delivery of a Climate Change Act for NI, as committed to in the recent NI Assembly agreement.
- Establish and correctly fund an independent Environmental Protection Agency or OEP capable of holding Government to account.
- Establish strategy objectives and targets which are SMART and legally binding (as with the Strategy itself) and which very clearly align with the achievement of the UN Sustainable Development Goals.

*Q11: Do you have any other comments or contributions?*

We would encourage the Department of Agriculture, Environment and Rural Affairs to engage widely with stakeholders. There is a great deal of expertise in universities and colleges, many of whom are very advanced on the sustainability agenda.

Yours sincerely,



Iain Patton, CEO, EAUC – The Alliance for Sustainability Leadership in Education