

re:Source :Consultations

Responses

**A Northern Ireland
Marine Bill –
Policy Proposals**

Response Date:
9 July

The Marine Task Force prepared a detailed comment providing information on why we need a marine Bill and the components it requires.

**NISEP Draft
Framework
Document**

Response Date:
18 July

While NIEL fundamentally supports this framework we feel that it does not take sufficient cognizance of the difficulty of comparing financial and longer term environmental and sustainability benefits. Accordingly we strongly urged that the scheme be revised to ensure that renewable energy solutions (preceded by energy efficiency upgrades of course) are given precedence in incentive schemes over fossil fuel solutions.

**Royal Commission
on Environmental
Pollution –
Topics for a Future
Study**

Response Date:
30 July

From the Northern Ireland perspective we feel that the final two topics; cost of embedded water and impacts of low carbon energy on the environment are the most worthy of further work by your Commission at this time. There was also some support for managing air pollution and the environmental impact of pharmaceuticals, but these were selected by fewer members.

**Assembly
Committee Inquiry
Renewable Energy**

Response Date:
8 August

A detailed questionnaire was completed, with emphasis throughout on ensuring that mechanisms promote the use of renewable but at the same time ensure that they are located and operated in ways that do not damage the environment.

**Draft Water
Framework
Directive (Priority
Substances and
Classification)
Regulations
(Northern Ireland)
2010**

Response Date:
10 August

NIEL believes that the proposed phased approach to meeting the Environmental Quality Standards by 2027 constitutes a deferral of the implementation of the Directive. A higher priority must be given to increased enforcement of legislation across all pressures and this approach must be supported by an extensive education and awareness raising campaign to ensure high compliance levels. NIEL is concerned that there may be over-reliance upon existing legislation for the protection of our water bodies from the risks associated with pollutants. In the absence of additional funding being made available, we believe NIEA will not have the financial and human resources necessary to effectively oversee the full requirements of existing and forthcoming legislation.



re:Source :Consultations

Responses

**NIEA Enforcement
Policy – Phase 2**
Response Date:
13 August

We strongly supported this policy, with an emphasis on the need to fully implement the Polluter Pays principle and Proportionality throughout and back up enforcement with communication to ensure the best likelihood of public awareness and compliance. Full reinstatement costs are a vital aspect of enforcement to make sure that the cost of non-compliance is highly discouraging to illegal action.

**Nitrates Action
Programme
Regulations
(Northern Ireland)
2010**
Response Date:
13 August

While broadly supportive of the measures proposed within the consultation document, NIEL made a number of specific comments in relation to farmyard manures, the spreading of fertilizer on steeply sloping land, the spreading distance from waterways, silage effluent collection and storage and the field storage of poultry litter. However, NIEL believes that the measures currently outlined in the consultation document, constitutes the minimal requirements if we are to see an improvement in our freshwater environment and therefore that these proposals should not be weakened in any way.

**Assembly
Committee Inquiry
Transport Bill**
Response Date:
16 August

A short comment stated that the sustainable use of resources, particularly carbon, should be a major area for departmental compliance.

**Strategy for
Sustainability of
the Honey Bee**
Response Date:
27 August

While we heartily welcome the Strategy which is long overdue, we are concerned that there will be limited funds to implement it. The commitment to partnership working with the beekeepers is a very important aspect of the strategy.

**Assembly
Committee Inquiry
Climate Change
Inquiry**
Response Date:
1 September

The DoE has responded to each of the 52 recommendations, and a summary response under a number of headline areas such as communication, legislation and targets was prepared by NIEL. In general we welcome the recommendations, and most of them were accepted by government. However, there is a heavy reliance on the Sustainable Development Strategy and its Implementation plan to deliver on the climate change targets, and there are no specific targets presented; it is argued that we need baseline data first. While we accept the need for data to be NI specific, we feel that action cannot be further delayed and reiterated the need for legislation, targets and action urgently.

