Programme for Government Unit  
The Executive Office  
Block E  
Castle Buildings  
Stormont Estate  
Belfast  
BT4 3SR

21st July 2016

Dear Sir / Madam,

I am responding to your consultation on the Draft Programme for Government Framework 2016-2021, as the Chairman of the Northern Ireland Branch of the Chartered Institution of Water and Environmental Management (CIWEM).

CIWEM is the only Royal Chartered professional body dedicated to the water and environment sector. We represent and support a community of thousands of members globally, dedicated to improving water and environmental management and associated social and cultural issues. Through our professional expertise we provide valuable advice on policy and practice, giving independent guidance for government, academia, the media and the public. For our members we are the professional body of choice, setting standards and providing the expertise to drive the industry forward.

The CIWEM Northern Ireland Branch has reviewed the Draft Programme for Government Framework 2016-2021 (PfG) and would like to make the following comments and recommendations.

The three pillars of sustainability are social, economic and environmental. Sustainability lies in the balance of these three factors. The draft PfG seems to be quite heavily weighted on the social side and very lightly on the environmental side. With the majority of the outcomes based on social criteria, the Programme may be inherently unsustainable in the future. As mentioned in outcome 2 of the PfG – “Ultimately, our economy, health and prosperity depend on our natural environment. Achieving economic growth at the cost of its degradation through over-exploitation or pollution is not sustainable.” This realisation of the dependence of our economy, health and prosperity on the environment has not been carried through the rest of the Programme.
Outcome 2: We live and work sustainably – protecting the environment

We would recommend that this outcome be modified by inserting the words ‘and enhancing’ as follows: ‘We live and work sustainably – protecting and enhancing the environment’, as the Executive has a duty to Protect and Enhance the Environment. The explanatory text within the PfG should reference the importance of enhancing the environment and in particular the water environment, which is so fundamental to many aspects of health.

We would recommend that the Executive contribute to valuing the place we live in by developing our eco-tourism to help our natural environment generate income and make a greater contribution to the economy. We have some beautiful and unique environments within Northern Ireland that need protected and enhanced to further their potential for tourism and recreation.

The aims of outcome 2 do not seem to be completely matched by the indicators. The outcome mentions food production, renewable energy, water purification, flood mitigation and protecting our natural resources (air, land, water, soil, biodiversity and geological resources).

The increasing environmental sustainability indicator is unfortunately only linked in with greenhouse gas emissions. We would recommend that this indicator is expanded to include all aspects of the environment.

The increasing household waste recycling indicator is limiting to future waste management practice. We would recommend that this indicator is expanded to include for circular economy and cradle to cradle thinking, along with the sequence of the waste hierarchy.

The improve air quality indicator is unfortunately too specific by itself. This indicator should be expanded to include for all aspects of the environment. Water quality and land (soil) quality are not covered by this.

We would recommend the following additional and amended indicators for the environment:

**Biodiversity**

No loss or deterioration of, and where possible enhancement to, international, national and local environmental designated sites within Northern Ireland, e.g. UNESCO World Heritage Sites, Special Areas of Conservation, Special Protection Areas, Areas of Special Scientific Interest, Areas of Outstanding Natural Beauty, Sites of Local Nature Conservation Interest. *The status and condition of these sites are monitored and reported on regularly.*

**Waste**

Adhere to the waste hierarchy, aiming first to prevent the generation of waste, then to prepare materials for re-use, then recycling, then recovery, and where no other option is available disposal. *The tonnages and percentages of materials is monitored and reported on regularly.*
Environmental Protection

Improve the quality of our air, water and land, adhering to all international and national environmental protection legislation. Monitoring of our water status via the Water Framework Directive, air quality through all parameters of the Air Quality Strategy and land quality through the Waste and Contaminated Land Order and Environmental Liability Regulations.

Outcome 11: We have high quality public services

We would recommend that this outcome be modified by inserting the words ‘and resilient’ as follows: ‘We have high quality and resilient public services’. The explanatory text within the PfG should reference the importance of the role of the Executive to ensure that public services are planned so that they can continue to be provided during the physical, social and economic shocks that are a growing part of the 21st century. By embedding planning to deal with these shocks into our approach Northern Ireland will be more able to respond to future adverse events, and deliver public services in both good times and bad, to all parts of the community. This adaptability to change is essential to the future success of Northern Ireland.

We would recommend creating a new indicator relating to the percentage of Government organisations that have a resilience strategy and action plan.

Outcome 12: We have created a place where people want to live and work, to visit and invest

We would recommend that this outcome include reference to the importance of the environment in creating a place where people want to live and work, to visit and invest. Many tourists come to Northern Ireland and the island of Ireland due to the environment.

We believe that the explanatory text within the PfG should reference the importance of the role of the Executive in relation to reducing the risk of flooding and would recommend a new indicator relating to flooding, such as the number of residential and non-residential properties at risk of coastal, fluvial and pluvial flooding.

Outcome 13: We connect people and opportunities through our infrastructure

We would recommend that the explanatory text within the PfG should reference the importance of the role of the Executive in relation to providing increased water and wastewater capacity to allow for new connections. A new indicator should be provided relating to wastewater capacity, such as the area of Northern Ireland served by wastewater treatment works, which have limited or zero capacity to allow new connections.

Outcome 14: We give our children and young people the best start in life

A clean, healthy and biodiverse natural environment in Northern Ireland should be regarded as fundamental to giving our children the best start in life. We would recommend that environmental indicators are included with this outcome.
The CIWEM Northern Ireland branch hopes that you find these comments and recommendations to be useful. If you would like any further inputs or future advice, please feel free to consult with us.

Yours sincerely,

Richard Bingham
CIWEM NI - Chairman
BSc MSc CSci MCIWEM C.WEM