

Review of Environmental Governance

INTERIM FINDINGS REPORT

Issued on Friday 29 September 2006

Review of Environmental Governance
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1.0 INTRODUCTION

- 1.1 It is clear to the Panel that the nature, structures and culture of environmental governance in Northern Ireland have evolved over many years and have been shaped by a wide variety of historic, institutional and political factors. At present, the governance of the environment engages an extensive range of core divisions, agencies and advisory bodies across nine of the eleven central Government Departments. In addition, a variety of environmental functions are carried out by local government.
- 1.2 During the past two years, the effectiveness of the region's environmental governance regime has been the subject of extensive debate by a broad range of stakeholders and interested parties. A concerted and sustained campaign by a coalition of environmental Non-Governmental Organisations (NGOs) provided the primary stimulus for this Review. Although that campaign focused largely on the issue of environmental regulation and a demand for the creation of an independent environment agency, more latterly it expanded into a request that a comprehensive Review of Environmental Governance would be undertaken.
- 1.3 In February 2006, the then Minister for the Environment, Jeff Rooker, launched this Review and appointed a panel of experts comprising Tom Burke (Chair), Sharon Turner and Gordon Bell. Biographies of the Panel members are available on the Review website (www.regni.info). A Secretariat was established to support the work of the Panel. A copy of the Terms of Reference for the Review is attached at Annex A.

2.0 THE REVIEW PROCESS

- 2.1 Our Terms of Reference asked us to report to the Minister by summer 2006 concerning the Review's findings thus far. The remainder of this document sets out our approach to conducting the Review; the key factors and principles that have informed our thinking; a summary of the key themes emerging from the consultation process; an outline of study visits already undertaken and those scheduled and our plan for the next stage of the Review.
- 2.2 We were also asked that the Review should be participative in its approach; that we should work in an open and transparent fashion and should consult widely. Consequently, when we commenced our work in late February 2006, we focused on how best to implement the Review process.
- 2.3 We agreed that the Review should be divided into a series of phases, namely:
 - **Phase One** – Consultation with interested parties;
 - **Phase Two** – Study visits to other jurisdictions within the UK and Europe to examine other models of good environmental governance;

- **Phase Three** – Drafting and publication of the *Interim Findings Report*; and
- **Phase Four** – Panel deliberation, further dialogue, research, drafting and publication of final report.

3.0 PHASE ONE

- 3.1 We approached the consultation exercise by creating a forum for dialogue during which all interested parties were given an opportunity to express their views on environmental governance to us and to each other. In addition, we determined that the Review website should be as interactive and accessible as possible. We decided that the website would be the focus of the debate and the repository for everyone's views. The website also has an interactive message board, where anyone can post questions, comments and observations.
- 3.2 In an effort to structure the consultation process, we identified four key questions and asked interested parties to consider their input in the light of these. It is important to emphasise that in identifying these questions, we did not seek to constrain the engagement of interested parties. Instead we sought to provide a structured starting point for what was anticipated to be a complex conversation. As the process evolved, it also became clear that these questions assisted organisations who did not initially perceive themselves as players in the environmental governance regime to participate in the consultation.
- 3.3 The questions were as follows:
 - What are your responsibilities concerning the protection or management of the environment or why does the environment matter to you?
 - What experiences have you of institutional obstacles, functional limitations or relationship barriers that have inhibited effective environmental protection and/or enhancement?
 - What remedies or solutions do you envisage to these problems?
 - What opportunities for better environmental management would be created for you if change occurred?
- 3.4 A wide range of interested parties from all sectors was invited to participate in this dialogue. These included:
 - central and local government;
 - economic interests;
 - science and research;
 - Non-Departmental Government Bodies;
 - Non-Governmental Organisations;
 - agriculture;
 - political parties;
 - voluntary and community groups; and

- Trades Unions and other representative bodies.

- 3.5 In the interests of transparency, the dialogue was carried out in a series of meetings-in-public. Although the conversations took place between us and interested parties, members of the public were able to observe proceedings. The meetings took place in Belfast during April to August 2006, and were recorded and transcribed so that a published record could be posted on the Review website. Annex B shows an alphabetical list of the organisations that participated in the meetings in public.
- 3.6 We were not able to meet all the parties who were interested in attending this series of meetings. Organisations who could not be met were offered the opportunity to submit their views in writing. The views submitted were also published on the website and added greatly to the knowledge and information gathered during Phase One. Many of the parties with whom we met also wrote supplementary papers or clarified issues which arose during our discussions. Annex C provides an alphabetical list of the organisations who have written to us prior to the publication of this report. Fully printable/downloadable copies of all materials submitted are available from the Review website.

4.0 PHASE TWO

- 4.1 Phase Two of the Review, which overlapped Phase One, involved a number of study visits to other jurisdictions of the UK and Europe. We met a wide range of government agencies and Non-Governmental Organisations that steward the environment in other jurisdictions and we gleaned a great deal of useful information. We would like to reiterate our gratitude to all the officials and individuals who generously shared their time, expertise and interest on the study visits. At the time of publication, study visits have been carried out in Scotland and Ireland. A visit to Brussels, to speak to the European Commission, the European Environment Agency and other organisations, is scheduled for October 2006. We will be visiting England to meet officials from the Department of the Environment, Food and Rural Affairs (DEFRA), Natural England, English Heritage and other organisations before the end of 2006. A list of the organisations we met and highlight reports of the Scottish visit are available on the Review website. The highlight reports of the Irish visit will be published shortly. More details of the organisations visited in each jurisdiction are also available.

5.0 PHASE THREE

In embarking on the consultation phase our listening was informed by a number of key factors and guiding principles. They are as follows:

5.1 Key Factors

The Uncertain Political Context

We are acutely aware that the final proposals for environmental governance must take account of a range of potential changes to the political and governance regimes of Northern Ireland. The Review is being undertaken at a time of constitutional uncertainty, the

outworkings of which will almost certainly impact on the structures and processes of environmental governance. At a macro level, we have to consider the development of alternative models of governance for a devolved administration and for a period of prolonged direct rule. Depending on the constitutional settlement, the architecture of central government is liable to change. Northern Ireland is currently being governed by the Secretary of State for Northern Ireland, through eleven Government Departments. Talks to re-establish devolved power to the NI Assembly are ongoing and the deadline for agreement has been set for 24 November 2006. Although no announcements have been made, it is possible that a new period of devolution may coincide with a different brigading of government responsibilities.

The All-Island Environment

In undertaking this Review, we are conscious of the practical realities of the distinctive all-island context. In this regard, we are aware that legal drivers increasingly demand that implementation of EU Directives take account of transboundary environmental impacts.

The Review of Public Administration

We recognise that Northern Ireland is in the process of a fundamental realignment of governance functions, structures and relationships through the Review of Public Administration (RPA). This change process has important implications for environmental governance, not least through the transfer of some planning functions to District Councils and the emerging commitment to community planning.

Regional Commitment to Sustainable Development

The Government recently launched the *Sustainable Development Strategy for Northern Ireland* and the publication of an implementation plan is anticipated in November 2006. Strengthening environmental governance is identified by the Strategy as an important dimension of the transition to sustainability.

The EU Dimension of Environmental Governance

Environmental standards in the UK are fundamentally informed by policy and legislation from the EU. We are conscious that a proactive and responsive approach to EU policy processes is essential to properly protect the region's interests, to avoid excessive exposure to the risk of fines for infraction, and to deliver good environmental governance.

5.2 Guiding Principles

Our Terms of Reference requested that this *Interim Findings Report* would cover the principles underpinning our work. The following is a list of the major principles that have thus far guided our thinking:

- Value as opposed to cost;
- Leadership;
- Trust and public confidence;

- Advocacy;
- Polluter pays;
- Transparency;
- Accountability and responsive government;
- Government as an intelligent customer;
- Evidence based regulation and policy making;
- Environmental justice;
 - o Active citizenship;
 - o Transparency;
 - o Access to justice; and
 - o Justice impacts of regulation and policy making;
- Mainstreaming environmental considerations into policy processes; and
- Mainstreaming environmental considerations into strategic and financial planning.

5.3 Key Themes

Following four months of dialogue, the following is a summary of the major themes emerging from the Review. We are not expressing a view on any of these themes at this stage. However, we consider them to be central to the next phase and merit further research and analysis.

5.3.1 Regulatory Reform

Effective regulation is widely perceived as being central to good governance of the environment. In addition, it is perceived to be fundamental to the transition towards sustainable development in Northern Ireland. Within this context, several major themes have emerged:

(i) Independent Environment Agency

There is almost universal support across a wide range of stakeholders for the creation of an independent environment agency in the region. Support for reform of this nature stems not only from a loss of public confidence in the quality of environmental regulation, but also a desire for greater transparency, leadership and public debate surrounding decision-making in this context. It is also informed by a desire for a cultural change within Government concerning the importance of environmental protection in public administration in the region. Nevertheless, a number of organisations, particularly those representing the agricultural and food industries expressed the view that less radical changes to Environment and Heritage Service (EHS), to improve aspects of its performance as a regulator, could suffice.

Discussion of this issue has centred around two alternative models for structural reform. On the one hand, there is considerable support for transferring the regulatory function to an Non-Departmental Public

Body (NDPB). However, we have heard arguments in support of transferring regulation to a Non-Ministerial Government Department.

There is significant support for the creation of a highly integrated environment agency. Many have argued in favour of retaining the current level of functional integration within EHS, but also to include other roles, such as those of the Rivers Agency, the Forest Service, and fisheries responsibilities. However, representatives within the built heritage sector have made arguments for alternative arrangements for the regulation of built heritage and ancient monuments. Those regulating the environment in other jurisdictions have expressed the merits and demerits of functional integration.

(ii) Role of Local Government

There is support for the rationalisation and transfer of some of EHS's current functions to District Councils, in particular, some of its land management functions. This process is seen as enhancing the regulator's focus and also as contributing to partnership working with local government.

(iii) Human Resources

We were asked to consider the potential impact of any proposed changes on the current staff of the organisations we are examining. Trades Unions and representative bodies expressed the view that the Review had, understandably, heightened interest and anxiety amongst staff, particularly in EHS, regarding potential changes to their working conditions.

(iv) Financial Implications

Concerns were expressed by those in industry and commerce as to the likely additional costs, to them, of the creation of an independent agency. In particular, these stakeholders were concerned about the likely increased emphasis on cost recovery associated with a new agency. Furthermore, they were concerned about the potential abuse of cost recovery as a means of raising revenue. This risk, both actual and perceived, was identified by the Environment Agency (EA) in Ireland and Scottish Environment Protection Agency (SEPA) in Scotland during our study visits. Concerns as to the likely cost to the public purse of such structural reform were also expressed.

We heard widespread views on the likely added value of such reform. In addition, we were advised of:

- the significant opportunities that exist for modernising regulation to build stronger financial incentives to reward compliance and better target penalties for failure;
- the need to embrace risk-based approaches to monitoring and enforcement; and
- the value of recent recommendations emerging from the Cabinet Office to decriminalise regulatory failures and make greater use of administrative penalties.

(v) Enforcement

Widespread concerns exist as to a lack of compliance with the rule of law both in the context of environmental and planning law. In this regard, public confidence is particularly low. We noted:

- perceived inequalities in treatment between the water and agricultural industries;
- perceptions that legitimate business is a soft target for regulation whereas the determinedly non-compliant or those engaged in illegitimate business are not the subject of similarly rigorous regulation;
- perceptions that there is little or no constraint on unlawful development or damage to built heritage; and
- a sense that the regulator rarely takes action to prosecute those who violate nature conservation legislation.

There are strongly held views as to the low level of penalties for environmental crime and weak implementation of the polluter pays principle. The judiciary is widely viewed as being disengaged from its role in the process of environmental governance, although more latterly in the consultation process, we were alerted to perceived improvements in this context. Similarly, there are perceptions that the environmental and planning regulators are not sufficiently skilled in representing the seriousness of environmental crime during the sentencing process. The potential transfer to the regulator of powers of prosecution emerged as an important theme.

(vi) Specialist Skills

The consultation exercise reflected a strong emphasis on the need for capacity building and integration of specialist skills within the regulator. Although the increased resources allocated to EHS in recent years were frequently acknowledged, the need for capacity building in the context of providing guidance to those subject to regulation, and handling the enforcement and prosecution processes was emphasised. Enabling the regulator to become a centre of excellence in environmental law and science was widely supported.

Developing strong partnership working between the regulator and local government, industry, the NGO community and civic society was seen as important.

Many highlighted the importance of investment in research to:

- underpin the authority of the regulator;
- support best practice in regulation; and
- provide a clear understanding of the impact of regulation and thereby improve responsiveness and innovation in regulatory approaches.

(vii) Spatial Planning

There is a perception that management of the development control process has been significantly weakened by the emerging role of the Planning Appeals Commission (PAC). There is also a perception that the incidence of appeals for non-determination by Planning Service, and the success rate of appeals has resulted in the PAC replacing Planning Service as the decision-maker in the context of development control. Both were highlighted as a weakness in the governance of the environment.

The restoration of development control powers to District Councils under the aegis of the RPA was generally viewed as a positive development. However, concerns were expressed regarding the impact of restoring enforcement powers to District Councils, particularly the potential problems of fragmentation, inconsistent enforcement and dilution of scarce skills.

(viii) Co-ordination

A number of stakeholders emphasised the relationship between the environmental and economic regulators as being an issue of major concern in considering the future of environmental governance.

Emphasis was placed on the need for co-ordinated environmental regulation on the island as a whole, particularly in the contexts of waste management, water, nature, climate change and energy.

We were asked to consider the role of the regulator in driving innovation and identifying new economic opportunities posed by changing environmental standards.

5.3.2 Policy Reform

During the listening phase, a range of key themes emerged concerning the brigading of responsibilities for environmental policy making and capacity building in this context. More specifically, the following themes emerged:

(i) Separating EHS from DOE

One of the most important wider themes emerging from the potential creation of an independent environment agency concerns the impact on DOE's Environmental Policy Division (EPD), specifically:

- greater clarification of the separate responsibilities allocated to EPD and the new regulator was seen as being essential;
- while a potentially significant transfer of responsibilities from EHS to EPD may need to occur to enable the regulator to concentrate more fully on operational issues, the importance of ensuring an equivalent transfer of resources was emphasised; and
- the importance of ensuring EPD's ability to perform as an intelligent customer of the regulator's technical advice – in other words, ensuring that EPD is resourced with sufficient specialist capacity to properly understand and compare the advice of an independent environment agency and other potential sources of scientific and technical advice.

(ii) Capacity Building

Policy making on the environment and more broadly, on sustainable development, was widely considered to be of a particularly complex nature. In addition, the importance of taking an interdisciplinary approach to environmental policy making emerged as a significant theme. Although concerns were not specifically quantified, we were made aware of a perceived shortage of specialist skills within the policy community, in particular, in the fields of environmental science, economics and law.

(iii) Risk Management

Although DOE's recent modernisation of the legislative framework governing the environment was frequently acknowledged, a significant theme concerned the need to ensure a proactive engagement with EU policy processes. A proactive but strategic approach to EU environmental policy making was considered to be essential to:

- avoid the creation of another backlog of unimplemented EU Directives;
- avoid a return to a perceived sense of policy 'fire fighting';
- avoid excessive exposure to EU fines; and
- better position the region in influencing the direction and potential impact of emerging policies at EU level.

A proactive approach to EU policy processes was considered to be essential as long as legislative responsibility for the environment remained a largely transferred matter.

The considerable policy and legislative experience now residing within EPD was identified as a valuable asset. Protecting the critical mass of this policy community was regarded as being essential to ensuring good governance of the environment. However, many noted that the strength of this policy capacity had recently been diluted by competing demands on DOE – in particular the RPA – but also by the proposed significant transfer of functions from EHS to EPD as the former moves to focus more strongly on operational issues.

(iv) Wider Structural Issues

Widespread concern exists as to the fragmented distribution of functional responsibility for policy making concerning the environment. In this regard, concerns were particularly acute in relation to the splitting of responsibility for spatial and strategic planning and the making of Area Plans. There was a strong sense of uncertainty as to which Government Department was responsible for the development of Planning Policy Statements. However, concerns about policy fragmentation extended to a wider discussion of the distribution of policy responsibilities affecting the environment across eleven Government Departments. Although stakeholders acknowledged the political expediencies of power sharing in shaping the architecture of central government, we were made aware of a sense of a highly siloed

policy community, which appears to significantly compound the effects of structural fragmentation.

We were made aware of a desire for greater policy integration concerning the environment. In this regard, two major priorities emerged, namely:

- the re-integration of spatial and non-spatial planning policy; and
- the re-integration of planning and environmental responsibilities.

Many stakeholders emphasised the need for wider policy integration on the environment. In this regard, there was considerable discussion of the most appropriate configuration of major policy responsibilities affecting the natural and built environment. In particular:

- transport;
- regional planning;
- energy and carbon reduction;
- agriculture;
- inland fisheries;
- social wellbeing/regeneration/development; and
- built heritage.

Stakeholders expressed concerns that the parallel considerations of the architecture of central government within the context of this Review, the ongoing RPA and the Preparation for Government Committee may not produce an optimal outcome for the management of the environment.

The importance of powerful mechanisms for mainstreaming environmental considerations into policy making across Government emerged as a theme, in particular:

- the importance of a statutory duty to contribute towards sustainable development;
- learning from the experiences arising from the implementation of Section 75 and Equality Impact Assessment;
- the value of the Strategic Environmental Assessment Directive; and
- the role of Integrated Impact Assessment.

Significant emphasis was placed on the need to integrate environmental considerations into financial policy and processes, in particular public procurement, the Comprehensive Spending Review, and the *Northern Ireland Investment Strategy*.

(v) Control over Fiscal Instruments

The central importance of fiscal instruments and economic policy in environmental governance was almost universally emphasised. In this regard, the following is a summary of the key issues raised:

- the transfer of responsibility for environmental policy and legislation without powers to adopt fiscal instruments to direct and stimulate behavioural change, is regarded as a significant weakness in the region's capacity to deliver strong environmental governance; and
- the distorting impact of the international border on the island has also been raised as a significant issue in the development of UK fiscal instruments.

(vi) Cross Border Policy Issues

The need for a greater focus on an all-island approach to environmental policy making also emerged as a major theme. The practical realities of a single island environment, the impacts of new EU legal frameworks requiring increased transboundary co-ordination and the benefits of economies of scale were widely identified as key drivers.

(vii) The Role of Independent Policy Advice

A number of themes emerged surrounding the role of independent advice to Government in the formulation of environmental policy, such as:

- the role, structure and funding of the Statutory Advisory Councils;
- the balance between stakeholder and expert advice; and
- the case for a regional or all-island equivalent to the Royal Commission on Environmental Pollution.

(viii) Transparency

The issue of transparency emerged as a major theme throughout the listening process. The following issues arose:

- robust and independent baseline information concerning the state of the environment in Northern Ireland was perceived to be essential to effective policy making and regulation;
- the publication of a "State Of The Environment Report" was considered to be important to public understanding of the issues and thereby to supporting civic participation in environmental governance; and
- the value of linking a Northern Ireland report and the Irish *State Of The Environment Report* was highlighted.

(ix) Research Management

A wide range of issues emerged concerning the governance of research. First and foremost, the importance of evidence based policy and regulation was emphasised. Robust governance of research and development processes was widely considered to be essential to achieving this objective.

More specifically, we heard of the need to ensure greater alignment between the commissioning of research and Departmental policy priorities, and the need for greater control by the policy core in

decision-making concerning research focus and investment. This change was viewed as being particularly important as the Government makes the transition from what was described as a retrospective or catching up phase of policy development to a more strategic and holistic approach. Although strategic and integrated research management was viewed as being a key tenet of good governance for all Government Departments, it is particularly the case in relation to DOE as the core policy and regulatory Department.

The importance of ensuring access to independent research was identified as an issue for Government in Northern Ireland. A range of views suggested that the currently fragmented arrangements for the governance of research could be leading to unnecessary duplication of research effort. The distinctive value of an interdisciplinary approach to research on the environment and sustainable development was widely emphasised.

(x) Accountability

Accountability was widely identified as a major theme. In this context, we were asked to consider the most appropriate models for accountability, taking into account the restoration of devolution or a prolonged period of direct rule.

(xi) Environmental Justice

The justice implications of environmental policy development and regulation were widely addressed. Furthermore, the issue of environmental justice was viewed as being essential to implementation of the *Sustainable Development Strategy for Northern Ireland*. Within this context, a range of specific issues were raised, including:

- recognition of the role of civic society in environmental governance;
- capitalising on the strength of the voluntary and community asset in Northern Ireland and engaging it in the process of environmental governance;
- customising the concept of community planning for the unique context of Northern Ireland's new local government and at a sub-level, recognising the potential of community planning as a vehicle for supporting active citizenship and strong environmental governance;
- access to environmental justice was seen to be ineffective. Suggestions for addressing this weakness included an enhanced environmental audit function, appropriate scrutiny mechanisms in whatever Parliamentary structures are adopted, an Environmental Ombudsman and potentially developing the roles of tribunals in delivering environmental justice; and
- the importance of transparency and ready access to reliable environmental information were seen as crucial to supporting public understanding of, and participation in, environmental governance.

6.0 PHASE FOUR

- 6.1 Phase Four of the Review will commence in October 2006. We will meet in private to deliberate on the themes emerging from the Review to date. During this time, we may commission further research or take expert advice on any of the themes we are exploring.
- 6.2 Early in 2007, the public and interested organisations will be afforded a further opportunity to engage with us through one or more round table events during which we intend to discuss our more fully formed ideas concerning the issues under consideration. The format of these events is being developed and more information, including dates and venue(s), will be available on the Review website in due course.
- 6.3 The message board on the Review website will remain live and we would encourage interested parties to post comments or observations throughout the period of the Review.
- 6.4 We will present to the DOE Minister and publish our final report and recommendations at the end of the first quarter of 2007.

**INDEPENDENT REVIEW OF ENVIRONMENTAL GOVERNANCE
ARRANGEMENTS IN NORTHERN IRELAND****TERMS OF REFERENCE**

Taking account of the Review of Public Administration, previous inquiries into environmental governance arrangements in Northern Ireland, and the existing and emerging EU environmental regulatory framework, the Review will address the structure, management and resourcing of the publicly funded elements of the environmental governance system¹ and will bring forward proposals for the future environmental governance arrangements, in relation to environmental protection, the natural heritage and the built heritage, covering such issues as;

- the arrangements for the organisation and supervision of the environmental governance system;
- the arrangements for the resourcing of the environmental governance system, having due regard to the 'polluter pays' principle;
- the role of constituent organisations within the environmental governance system in relation to strategy, policy and legislative development;
- measures to improve the responsiveness and accountability of the environmental governance system;
- the scope for structured co-operation between environmental governance bodies within these islands.

The Review should be participative in its approach, should conduct its work in an open and transparent fashion, and should consult widely, including with non-governmental expert organisations, stakeholders and the public.

¹ Taken to mean those organisations within and associated with government with a role to play in protecting and enhancing the built and natural environment. It will be for the independent Review to determine the organisations which it wishes to include within the Review, working in accordance with its Terms of Reference.

The Review will commence in February 2006. An interim report of the Review's findings should be presented to the Minister for the Environment, and published, for public consultation by summer 2006. The interim report should cover such issues as the principles underpinning the Review's work, emerging models and emerging cost issues.

The Review should present and publish its final report by end 2006. The final report should include recommendations for future action supported by a costed business case and a proposed timetable for implementation.

**Organisations that have met with the Panel
(Alphabetical List)**

1. Agri-Food and Biosciences Institute
2. Alliance Party
3. Built Heritage Forum
4. Chartered Institute of Environmental Health
5. Coalition for Environmental Protection
6. Community Technical Aid
7. Confederation of British Industry
8. Council for Nature, Conservation and the Countryside
9. Department of Agriculture and Rural Development (DARD)
10. Department of Culture, Arts and Leisure (DCAL) - Inland Fisheries and Waterways
11. Department of Enterprise, Trade and Investment
12. Department of Finance and Personnel (DFP) - Central Procurement Directorate
13. Department of Health, Social Services and Public Safety
14. Department of Regional Development (DRD) - Ports and Public Transport Division
15. Department of Regional Development (DRD) - Water Reform Unit
16. Department of Social Development (DSD) - Urban Regeneration
17. Department of the Environment (DOE) - Environmental Policy Division
18. Department of the Environment (DOE) - Local Government Reform
19. Environment and Heritage Service
20. First Division Association
21. Food Standards Agency (NI)
22. Friends of the Earth
23. Green Party
24. Historic Buildings Council
25. Historic Monuments Council
26. Invest Northern Ireland
27. Joint Marine Partnership
28. Loughs Agency
29. Northern Ireland Agricultural Producers' Association
30. Northern Ireland Environment Link
31. Northern Ireland Food and Drink Association
32. Northern Ireland Local Government Association
33. Northern Ireland Public Service Alliance
34. Office of the First Minister and Deputy First Minister (OFMDFM) - Review of Public Administration
35. Planning and Water Appeals Commission
36. Planning Service
37. Quarry Products Association (NI)
38. Rivers Agency
39. Roads Service

- 40. Royal Society for the Protection of Birds
- 41. Social Democratic and Labour Party
- 42. Strategic Investment Board
- 43. Technical Advisers Group
- 44. Ulster Farmers' Union
- 45. Ulster Unionist Party
- 46. Ulster Wildlife Trust
- 47. University of Ulster

**Written Submissions
(Alphabetical List)**

1. Alliance Party
2. Built Heritage Forum
3. Chief Environmental Health Officers Group (NI)
4. Coalition for Environmental Protection
5. Community Technical Aid
6. Confederation of British Industry
7. Council for Nature Conservation and the Countryside
8. Countryside Access and Activities Network (NI)
9. Department of Agriculture and Rural Development (DARD)
10. Department of Culture, Arts and Leisure (DCAL) - Inland Fisheries and Inland Waterways
11. Department of the Environment (DOE) - Environmental Policy Division
12. Department of Finance and Personnel (DFP) - Central Procurement Directorate
13. Department of Health, Social Services and Public Safety (DHSSPS)
14. Department for Regional Development (DRD)
15. Drainage Council for Northern Ireland
16. Environment and Heritage Service
17. Food Standards Agency (NI)
18. Forest Service
19. Friends of the Earth
20. General Consumer Council (NI)
21. Historic Buildings Council
22. Historic Monuments Council
23. Institute of Directors
24. International Tree Foundation
25. Invest NI
26. Joint Marine Partnership (WWF and UWT)
27. Lough Neagh and Lower Bann Advisory Committees
28. Mourne Heritage Trust
29. National Trust
30. Northern Ireland Biodiversity Group
31. Northern Ireland Council for Voluntary Action
32. Northern Ireland Cycling Initiative
33. Northern Ireland Electricity
34. Northern Ireland Environment Link
35. Paul F. Haslam
36. Planning Appeals Commission
37. Planning Service
38. Port of Belfast
39. Prehen Historical and Environmental Society
40. Quarry Products Association (NI)
41. Richard Macrory

- 42. Rivers Agency
- 43. Roads Service
- 44. Royal Society for the Protection of Birds
- 45. Technical Advisers Group (NI)
- 46. Tidy NI
- 47. UK Environmental Law Association
- 48. Ulster Angling Federation Ltd.
- 49. Ulster Unionist Party
- 50. University of Ulster
- 51. Waterways Ireland
- 52. World Wildlife Fund