

Briefing paper



gbest@mpa.ni.org
To: DAERA Private Office

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Fri 09/02/2024 13:50



Briefing Paper for Minister Andrew Muir Feb 2024.pdf
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Mineral_Products_Industry_Priorities_for_Government_2022-2027 (2).pdf
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Dear Andrew

Just wanted to say congratulations and give you our best wishes on being appointed DAERA Minister.

We look forward to working with you and your team in the weeks and months ahead particularly on the journey to net zero and decarbonisation, protecting and enhancing our biodiversity and water environment.

Gordon Best

Regional Director

T: 02890824078 E: info@mpa.ni.org W: www.mpa.ni.org

Mineral Products Association (Northern Ireland) Ltd, Unit 10 Nutts Corner Business Park, Dundrod Road, Crumlin, Co Antrim, BT29 4SR



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Mineral Products Association NI

Briefing Paper

Prepared for

Minister for Agriculture Environment and Rural Affairs, Andrew Muir
MLA

12th February 2024

by
Gordon Best
Regional Director
Minetral Products Association NI

Introduction

Founded in Northern Ireland in 1998 the Association now represents 95% of aggregate production in the province. Our membership includes major, medium and smaller sized companies. The Association represents companies engaged in the supply of primary aggregates; the processing of recycled and secondary materials; the production of down stream processed products such as asphalt, lime, mortar, ready-mixed concrete, precast concrete and road surfacing contracting.

Aggregates are among the very essentials of life - as important to us in their own way as the food from our farms. Through their products, quarries give us places to live, places to work, places to play and much more. They literally underpin our society.

Quarrying does, however, have environmental implications and recognising this, the Northern Ireland industry aims to adopt a responsible approach to its work and a considerate attitude to its neighbours.

Mineral Products is a major industry in Northern Ireland. The Mineral Products industry in Northern Ireland directly employs some 5000 people, produces approximately 22 million tons of aggregates per year and has a turnover of around £750 million per year (2% of NI GDP). The Mineral Products Sector is a varied industry, with the majority of NI businesses family owned, alongside a number owned by large multinational companies, it is primarily a rural industry, supporting jobs in rural areas. The full economic impact of the geoscience industry to the wider NI economy is calculated to be 83,700 jobs, £3.7 billion in Gross Value Added (GVA) and £1.8 billion in wages. More information on the economic value of the Geo Science sector to the NI Economy can be viewed at https://www.ulster.ac.uk/_data/assets/pdf_file/0010/406936/Economic-Impact-of-Geosciences_final-report-12th-April-2019.pdf

The majority of the Minerals Industry in NI is strictly controlled and has to meet high standards of environmental performance set by Government and the Planning Authorities. As urban sprawl and land designation increases, it is vitally important that Northern Ireland's aggregate resources are identified and protected for responsible utilisation by future generations.

The purpose of this briefing paper is to brief the Minister and senior officials, on the work that the Mineral Products Association NI does with the various Departments under the control of the DAERA Minister.

Core Values

Every member of the MPANI is expected to subscribe to a set of core social values which in turn feed the sector's sustainable development strategy. Attached to each core value are one or more performance indicators so that performance can be constantly assessed with a view to improvement. The aspiration is always to do better.

Social progress

- **Health & safety**

The highest priority for MPANI members is the health and safety of their employees, contractors and visitors.

- **Competence**

We recognise the need to maintain and develop a competent workforce.

- **Working with the community**

We recognise that our operations are part of the local community and strive to be good neighbours.

- **Partnerships with stakeholders**

We value our partnerships with all relevant stakeholders and recognise that good communications with them are essential.

- **Heritage**

We recognise the importance of our national heritage.

Environmental protection

- **Natural environment**

We recognise the potential that our operations have to affect the environment and are committed to minimising and mitigating such effects.

- **Restoration of land**

Quality restoration and aftercare of industry operations, sensitive to local requirements, is an essential part of the responsible stewardship that we expect from MPANI members.

- **Biodiversity and geodiversity**

We are committed to improving our management of biodiversity and geodiversity.

Natural resources

- **Resource conservation**

We recognise our responsibility to make the most efficient use of all resources.

Economic prosperity

- **Providing essential materials**

We recognise that the materials we supply are, and will continue to be, essential for the improvement of standards of living and the quality of life in NI and the wider UK.

- **Employment**

We recognise that our operations are an important source of employment and economic activity.

Key Issues

Climate Change and Carbon reduction

MPANI is currently working with a number of organisations in the public / educational / private sectors in collaborative networks investigating the use of biochar and biomethane in the manufacture of construction products. A number of our members have been awarded funding through the IETF and Innovate UK to decarbonise their operations. We are also in discussions with other partners to look at the use of Low value / High Volume materials for use as low carbon alternatives in cement and asphalt manufacture. We are also considering the formation of "quarry clusters" to investigate the production of green hydrogen.

We are committed as an Industry to do our bit to achieve zero carbon emissions by 2050. The ever-increasing speed of change of technology means we are at the beginning of a new Industrial Revolution driven by energy transition and digitisation that will undoubtedly transform many traditional industries such as minerals and the manufacture of construction materials. The technology is now available and developing that will mean many industrial operations, including quarrying, can become energy independent and carbon neutral by using renewable wind not only to power its day time operations but then to use the that wind energy at night to manufacture and store its own hydrogen energy by having an electrolyser on site. This on site produced energy can then be used to not only fuel other on site operations and mobile plant but also any transport fleet used to supply materials to customers.

Decarbonisation and the circular economy are areas where we as a Minerals Sector are devoting a lot of time and expense developing our thoughts and identifying objectives for the medium and long term. The cement industry has reduced its carbon footprint by over 50% since 1995 and continues to invest billions worldwide into further reduction through carbon capture, low carbon additives and low/zero carbon fuels. In the UK and NI we are the largest transport sector by tonnage. In NI alone we transport approximately 80,000 tonnes of construction materials every day. That's 4000 Lorry loads every day. If they were parked together, they would stretch from Belfast to Dungannon. The decarbonisation of our Industry in terms of the extraction, processing, manufacture and transport of construction materials will make a significant contribution to reducing the carbon footprint of our built environment and the wider economy of Northern Ireland. To achieve this, we need Government support and a joined approach and incentivising through innovative procurement policy as Government purchases almost 40% of construction materials made in NI.

Many MPANI members have already invested in new renewable technologies such as wind turbines, photovoltaics and now EV charging points for company cars and small vans. However, this drive towards decarbonisation is being hampered by delays in planning and the lack and cost of electricity grid connections. MPANI would highlight a number of

areas that if addressed and solutions found would greatly change the way we generate and use energy here in NI.

1. The lack of capacity to receive non-centralised generation throughout the electricity grid is a matter that needs urgent consideration. MPANI members have a strong interest in facilitating generation of renewable or low carbon electricity for society. The location, extent and the availability of natural resource (eg wind and water) at our members sites means that we are well placed to facilitate lower carbon technology rollout and innovation.
2. The lack of interconnection capacity to GB and RoI is further constraining NI's ability to decarbonise – members generating assets should not have to be constrained during periods of local low demand and high wind for example.
3. We appear to have a poor electricity grid that is incapable of receiving diffuse sources of decarbonised energy generation.

Government and each industry sector will need to work in close collaboration, to build a shared understanding and pathway to net zero, one where policy, financial and infrastructure enablers are coordinated to support each sector's decarbonisation and to manage a just transition.

There is a need for long term support for hard-to-abate sectors, such as our own, from Government similar in scale to the policy and financial support that has driven renewables development and deployment.

We would emphasise that it is vital to ensure a 'just transition', which maintains the competitiveness of NI and UK manufacturing and jobs, and which is fair to consumers and society. As part of this, it is also important that UK territorial emissions are not replaced by carbon leakage where imported goods shift the environmental issue abroad, driven by unequal carbon cost.

We believe that CO2 emissions from buildings and infrastructure should be assessed over their whole-life, not just embodied carbon.

NIEA

MPANI, and formerly QPANI, has always had an excellent working relationship with Environment and Heritage Service and now NIEA. One of our major concerns is the delays in the planning process caused by the time it takes for statutory consultees to make decisions. MPANI warmly welcome the report written by John Irvine of DfI which looks at the role of statutory consultees within the NI Planning process. The paper considers

how stakeholders can come together to streamline the process to build capability and improve the efficiency and responsiveness of the system, particularly for major and economically sensitive applications. MPANI would call for quick implementation of the Irvine report recommendations.

Statutory Consultees play an essential role within the planning process. There is a clear need to change the Planning System culture here in Northern Ireland and as such we would support the full adoption of the 2019 Irvine Reports 4 main conclusions and 13 recommendations for consideration. That said however there needs to be significant investment in skills and knowledge within statutory consultees, such as NIEA, as they are an important part of the planning process.

Prior to the voluntary exit scheme, we had regular contact through our "quarry group" and some excellent initiatives were progressed. The industry has worked closely with NIEA Industrial Pollution and Radiochemical Inspectorate (IPRI) to produce modern guidance that has resulted in a significant improvement in performance and high levels of compliance.

On the protection and enhancement of Biodiversity the local quarry industry has a very proud record of good practice and guardian ship of local biodiversity. To view the guidance that MPANI gives to Members and to view actual local case studies go to our website at <https://mpani.org/biodiversity/>. On a national scale we have just celebrated 50 years of

MPA has also produced Biodiversity Action Plans/Management Plans Guidance for its members.

For more information on guidance, we give to members go to our website at [Quarries & Nature \(mineralproducts.org\)](http://Quarries & Nature (mineralproducts.org))

The industry has in the past worked closely with NIEA Water Management unit to produce modern guidance on the "Wise Use of Water" that has resulted in a significant improvement in performance and high levels of compliance.

To view the guidance document, go <https://www.daera-ni.gov.uk/publications/guidance-wise-use-water-aggregates-and-quarry-products-industry>.

Last year our MPANI / NIEA Liaison group set about updating this excellent guidance document. This guidance was first published and endorsed by Roy Ramsay, it was then updated and became electronic back in 2015 under Wesley Shannon's reign as chief executive. NIEA staff

and MPANI committee members put a lot of hard work into the updated version and it's an example of how the regulator and industry can work together to improve performance and protect our precious water environment. We have been awaiting NIEA Senior Management signoff for the guidance for a number of months now so anything you can do to progress this would be much appreciated.

The Minerals industry has a very important part to play in the conservation of our natural heritage in view of the areas of land that it manages. Extraction activities can have damaging effects on the environment, be visible on landscapes and may impact on the integrity of ecosystems, therefore they are areas of concern in planning.

Conversely, quarries can be important sites for biodiversity because they can support a diverse mix of habitats and substrates. Exposed rock faces, nutrient-poor soils, a diverse range of available niches, and closeness to large areas of semi-natural habitat also contribute to the potential wildlife value of quarries. Quarries can be important sites for the study of geodiversity because they provide valuable geological exposures. They can be an important resource for geological education, training and research. This may range from the involvement of schools and local communities in discovering and understanding their local natural heritage, to more detailed scientific research and the conservation of important geological evidence.

MPANI are actively addressing the biodiversity challenges our members face including, adopting standards and guidelines and actively engaging with biodiversity experts to mitigate the impacts of operations, to ensure no net loss of biodiversity, to strengthen positive impacts and wherever possible to strive for a net positive biodiversity impact. In recent times local MPANI member companies have developed partnerships with RSPB, Woodland Trust and NIEA that has seen restoration best practice adopted, significant hectares of natural woodland planted and local companies sign up to the All-Island Pollinator Plan. Therefore, it is a sector in which biodiversity is being actively addressed and from which many lessons can be learned as well by businesses operating in other sectors.

Modern guidance on the management of Non-Energy Extractive Operations within designated sites show how the needs of extractive industry can be met while avoiding adverse effects on wildlife and nature. The guidance, http://ec.europa.eu/environment/nature/natura2000/management/docs/nee_i_n2000_guidance.pdf examines how the potential impacts of

extraction activities on nature and biodiversity can be minimised or avoided altogether. It highlights the importance of strategic planning, the appropriate assessment of new developments, and the need for adequate mitigation measures. The guidelines contain many examples of best practice, and show how some extraction projects can ultimately be beneficial to biodiversity by providing highly quality ecological niche.

Taking the guidance from this EU Document into consideration MPANI would contend that all extractive operations, regardless of their location, being determined against a criteria-based policy and if a proposal meets those criteria, then it will be acceptable. This effectively means that every operation will be determined on its merits. Responsible businesses will adopt practices that take recognition of their impacts on neighbours and will do everything they can to mitigate the environmental and amenity impact of their operations. All impacts will be assessed and mitigation measures proposed as part of an environmental impact assessment in the planning application process.

MPANI acknowledge the extraction process and construction materials manufacturing sites, if not managed to best practice standards, have the potential to impact negatively on residential amenity through noise, dust and increased traffic. However, MPANI believe, and have proof, that the significance of these impacts is perceived in many cases and not supported by the reality of reports on the ground. For example, year on year Noise Complaints Statistics issued by NIEA does not identify the quarrying sector as a source of complaint. Also, latest statistics from NIEA show the quarrying industry in Northern Ireland to have one of the highest compliance rates for water discharges from their sites. The quarrying industry is one the most regulated industrial sectors and through MPANI our Members in Northern Ireland have access to the most current and expert advice on reducing their environmental impacts.

In terms of quality restoration this is now standard practice with mineral applications. We would add that any restoration plan should take account of enhancing and protecting any priority species identified in the local area and enhancing any designation in the locality.

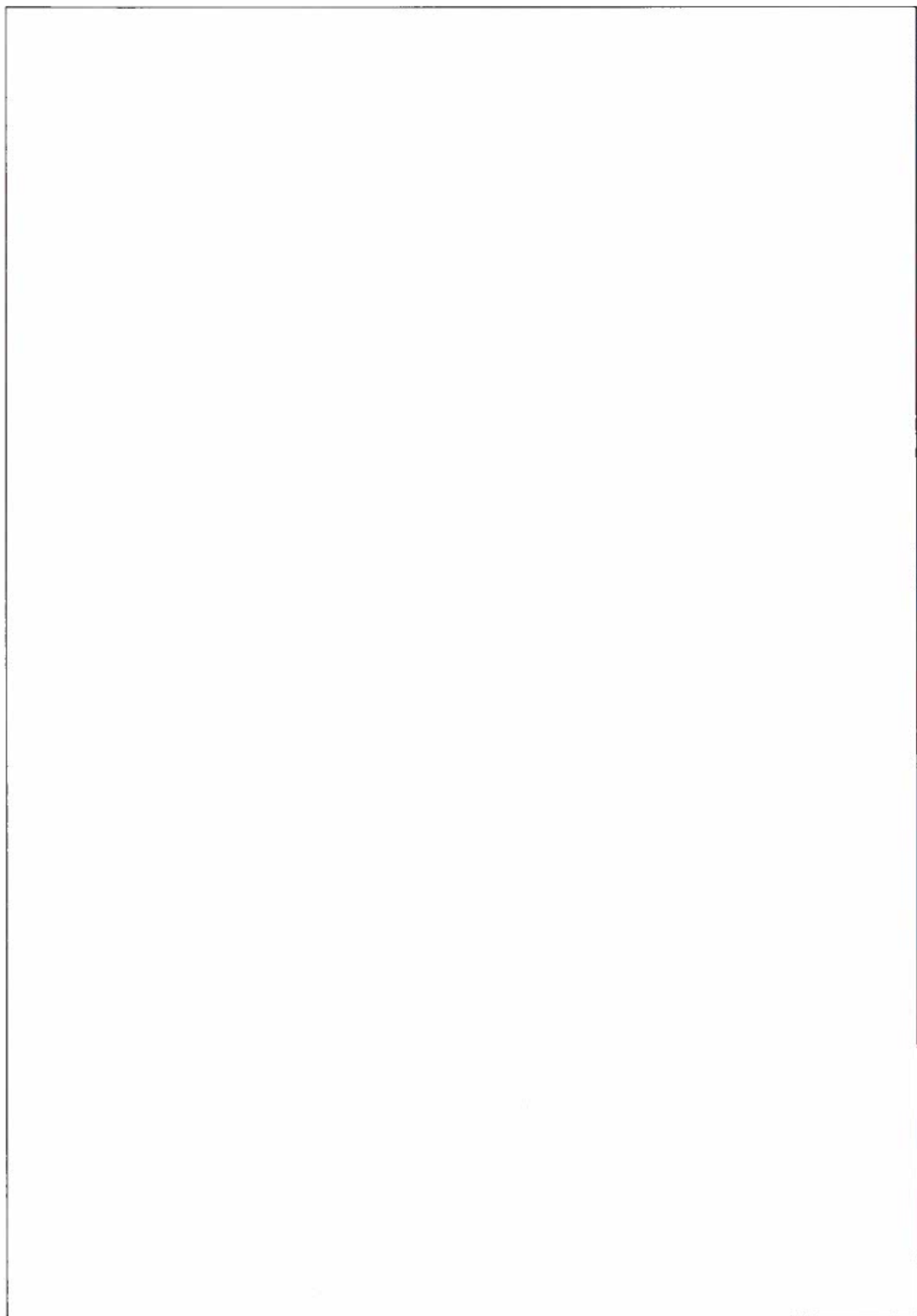
The transport of aggregates and construction materials can have significant detrimental effects on local air quality in relation to dust and particles the mitigation measures, investment and legal obligations that local operators can make and implement is sufficient to minimise these effects. While the Aggregates Levy Credit Scheme is no more the guidance set out in the compliance protocol is still the operating standard expected by the industry.

The Mineral and Aggregates Industry has the potential to impact negatively on historic environments and cultural assets. However, in recent years Mineral Planning applications have included a requirement to investigate possible archaeological remains on proposed quarrying land. To address this and to mitigate any possible loss of archaeological heritage the Quarry Industry through MPANI agreed a "Memorandum of Understanding" with the DfC Historic Environment Department. (HED).

Conclusion

Minister, I hope this briefing paper has been informative and I trust you have had the opportunity to review our "Priorities for Government paper. We would cordially invite you, when the time is suitable, to visit one of our member's sites to view for yourselves the investment and resources that go into supplying aggregates and other construction materials for the NI and UK Construction Industry. We would also take the opportunity to show you the increasing investment in energy efficiency and energy transition measures in order to reduce the carbon footprint of the industry, biodiversity enhancement and the increased use of recycled and secondary materials.

For further information on these issues please contact Gordon Best, Regional Director, Mineral Products Association NI on 02890824078 or mobile 07876136929 email gbest@mpani.org or visit our website at www.mpani.org



Mineral Products Industry Priorities for NI Government

Delivering for Northern Ireland

The mineral products industry is an essential, indigenous and major primary material producer that is locked into the DNA of the NI economy. Our members supply 80,000 tonnes of materials per day to construction customers across NI, the RoI and GB. Our materials are critical to many other NI industries such as transport, energy, agriculture, water and housing that all rely upon the supply of mineral products of one type or another. In short, we are fundamental to the economy, the development and maintenance of NI Infrastructure, the built and natural environment and the improvement of people's everyday lives. Mineral products will continue to be essential as we build back better and chart our course to decarbonisation and Net Zero by 2050. To maximise competitiveness of our sector and the wider economy, NI Government and political leaders must prioritise the best access possible to local, national, all island and global markets and skills.

Priorities for NI Government

An efficient and fit for purpose planning system

- Adequately resourcing of the planning decision making process, including statutory consultees at both DfI and local Council level.
- Establishment of a local Council shared service for the management and processing of Mineral Planning in NI.
- Protecting and safe-guarding the local supply of mineral products in line with the Strategic Planning Policy Statement and UK Minerals Strategy.
- Introduction of a review mechanism for environmental conditions so that all mineral sites are operating to the most up to date environmental conditions.
- Ensure planning enforcement is robust to protect responsible operators.

Improve the delivery of infrastructure projects and the maintenance of our roads, water and sewerage networks

- Establish an Independent Infrastructure Commission in order to secure a long-term approach to wider infrastructure planning and delivery, and to help drive our post Covid recovery, our response to Brexit and enable us to ambitiously tackle the climate crisis.
- Establish multi-year infrastructure and maintenance budgets.
- Support responsible operators through the procurement and rating systems. Make responsible sourcing principles a key pillar of public sector procurement.
- Instigate an independent review into the procurement of construction services and contracts in NI.

Investing in Skills

- Ensure the education and skills system provides the workforce with the capabilities required for the modern economy.

- Develop a culture of life long learning and develop a specific Digital Skills action Plan for Northern Ireland.
- Need to facilitate and incentivise strong links between Business and Local Schools.
- Support for 14 – 19 year-old young people who wish to follow a more vocational and technical career path.

Supporting Industry to transition to lower / zero carbon fuels and power sources:

- Provide support to those heavy industries who can transition to renewable energy and eventually to green hydrogen.
- Provide support for the retraining of staff for new zero carbon technologies.
- Provide support for traditional industry to utilise innovative technology and digitisation.

Making industry taxation fairer and more efficient:

- Support for appropriate and fair environmental taxation.
- Use the tax system to incentivise good practice and corporate, social responsibility.

Protect NI Industry and the high standards it applies

- Recognise 3rd Party accreditation and quality standards as a condition for supplying materials to the public sector in NI.
- Implement in full the findings of the Hackett Report to ensure the fire safety of all buildings.
- Holding imported construction materials to the same quality and environmental standards as locally produced products.

*Mineral Products: essential for schools . . . hospitals . . . homes . . . roads . . . railways
. . . energy supply . . . airports . . . ports . . . food . . . water . . . agriculture*

MPANI Member Commitments to NI Government

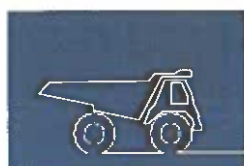
Meeting the future demand for mineral products generated by economic growth and development by:

- Investing in our people to improve skills and competence and broadening awareness of employment opportunities in the sector.
- Investing in indigenous mineral resources, manufacturing plant and transport operations.
- Contributing to the innovative development of mineral products and evolution of product standards and design codes.
- Planning our future operations in a sustainable way.

Improving the sustainability of the NI supply chain by:

- Protecting the health and safety of our workforce and all associated with the industry, including neighbours and local communities.
- Work with NI Government to set achievable targets and deliver a net zero carbon economy by 2050.
- Continuing to make full use of recycled and secondary materials, supporting the circular economy.
- Increasing biodiversity, net gain and nature conservation on our sites and through quality restoration.
- Continuing to reduce our emissions, meeting higher environmental standards and going beyond compliance.
- Working with customers to ensure efficient and sustainable use of industry products.

The mineral products industry and its supply chain contribution to Northern Ireland:



22mt

Annual NI production of aggregates and manufactured mineral products



5,000

local employees supporting rural communities



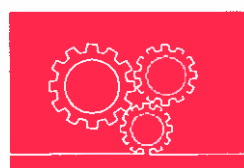
£700m

Annual turnover for the NI mineral products industry



£1.9bn

Annual Gross value added generated by the industry



£1.8bn

Annual turnover of the industries we supply



£2.5bn

Annual value of construction output, our main customer



31,200

People employed in the geo science industry



83,700

Jobs supported through our wider supply chain

The Mineral Products Association (NI) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and silica sand industries. For further MPANI information visit www.mpani.org

Mineral Products Association NI
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Tel 02890 824078
info@mpani.org



**Northern Ireland
essential materials
sustainable solutions**

Mineral Products: essential for schools . . . hospitals . . . homes . . . roads . . . railways
. . . energy supply . . . airports . . . ports . . . food . . . water . . . agriculture

RE: Briefing paper (DAERA REF: INV-1094-2024)



Good morning Gordon,

Please see attached letter from Minister Muir MLA in response to your email of 09 February 2024.

Please note that a hard copy of this letter will not follow in the post.

Kind Regards



DAERA Private Office | First Floor, Clare House | 303 Airport Road West | Belfast | BT3 9ED | Contact: [Redacted]

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From: DAERA Private Office <Private.Office@daera-ni.gov.uk>

Sent: Monday, February 12, 2024 3:23 PM

To: gbest@mpani.org

Subject: RE: Briefing paper (DAERA REF: INV-1094-2024)

Good afternoon Gordon,

Thank you for the attached correspondence to Minister Muir.

This request is currently under consideration and a response will issue in due course.

Kind Regards



DAERA Private Office | First Floor, Clare House | 303 Airport Road West | Belfast | BT3 9ED | Contact: [Redacted]

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From: gbest@mpni.org <gbest@mpni.org>
Sent: Friday, February 9, 2024 1:50 PM
To: DAERA Private Office <Private.Office@daera-ni.gov.uk>
Subject: Briefing paper

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Dear Andrew

Just wanted to say congratulations and give you our best wishes on being appointed DAERA Minister.

We look forward to working with you and your team in the weeks and months ahead particularly on the journey to net zero and decarbonisation, protecting and enhancing our biodiversity and water environment.

Gordon Best

Regional Director

T: 02890824078

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**From the Office of the
Minister of Agriculture,
Environment and Rural Affairs**



Department of
**Agriculture, Environment
and Rural Affairs**

www.daera-ni.gov.uk

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Telephone: 028 9052 4140
Email: private.office@daera-ni.gov.uk

Our Ref: INV-1094-2024
Date: 16 February 2024

Dear Gordon

**INVITATION TO VISIT A MINERAL PRODUCTS ASSOCIATION NI (MPANI)
MEMBER SITE**

Thank you for your email of 9 February 2024 inviting me to visit a Mineral Products Association NI member site and also for sharing the MPANI Briefing Paper and your document highlighting the Mineral Products Industry Priorities for NI Government.

I would be pleased to take you up on this offer of visiting one of your member's sites.

My Diary Manager, [REDACTED] will contact you in due course to make the necessary arrangements.

Yours sincerely

ANDREW MUIR MLA

Minister of Agriculture, Environment and Rural Affairs

INV-1094-2024 : Invitation to visit a Mineral Products Association NI (MPANI) member site



Raised By: Gordon Best

Reference: INV-1094-2024

Subject: INV-1094-2024 : Invitation to visit a Mineral Products Association NI (MPANI) member site

Referred To: [Redacted]

Date referred: 05/12/2024

Please see attached response issued by email this afternoon. The CM container for this case is AE2-24-15240 and it is the Business Area's responsibility to save all correspondence appropriately.

For further information etc. contact:



Private Office



Copied To For Information:

Godfrey, Katrina (DAERA – Perm Sec); [Redacted]
[Redacted]
[Redacted]
[Redacted] DAERA
Press Office; DAERA PermSec; DAERA Green Growth Co-ordination

From: DAERA Private Office
Sent: 05 December 2024 18:39
To: gbest@mpa.ni.org
Subject: RE: Letter to Minister Muir (DAERA REF: INV-1094-2024)
Attachments: Letter from Minister Muir MLA.pdf; Letter- 16.02.24.pdf; Letter Minister Andrew Muir Dec 2024.pdf

Good afternoon Gordon,

Please see attached letter from Minister Muir MLA in response to your letter of 02 December 2024.

Please note that a hard copy of this letter will not follow in the post.

Kind Regards

DAERA Private Office | First Floor, Clare House|303 Airport Road West | Belfast | BT3 9ED |

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Department of
Agriculture, Environment
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An Roinn

Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

Department of

Fairmin, Environment
an' Kintra Matthers

*Sustainability at the heart
living, working, active lands
valued by everyone.*

From: gbest@mpa.ni.org <gbest@mpa.ni.org>
Sent: 02 December 2024 12:12
To: DAERA Private Office <Private.Office@daera-ni.gov.uk>
Subject: Letter to Minister Muir

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Please find attached letter to Minister Muir. I would be grateful if you could acknowledge receipt by return email.

Gordon Best
Regional Director

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Mineral Products Association (Northern Ireland) Ltd, Unit 10 Nutts Corner Business Park, Dundrod Road, Crumlin, Co Antrim, BT29 4SR



Northern Ireland
essential materials
sustainable solutions

From the Office of the
Minister of Agriculture,
Environment and Rural Affairs



Department of
Agriculture, Environment
and Rural Affairs

An Roinn

Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

Department of

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Email: private.office@daera-ni.gov.uk

Our Ref: INV-1094-2024
Date: 05 December 2024

Dear Gordon

INVITATION TO VISIT A MINERAL PRODUCTS ASSOCIATION NI (MPANI) MEMBER SITE

Further to my correspondence of 16 February 2024, copy attached, unfortunately due to significant pressures on my diary, it has not been possible for my office to arrange this visit and meeting. I am though very interested to learn more about the work MPANI is doing on decarbonisation and environmental enhancement. Therefore, I have asked [REDACTED] Deputy Director of Green Growth Delivery and Climate Action Division to coordinate a meeting of relevant officials with you, and he will provide me with a readout following the meeting.

Please contact him directly by emailing [REDACTED]@daera-ni.gov.uk

Yours sincerely

ANDREW MUIR MLA

Minister of Agriculture, Environment and Rural Affairs

Sustainability at the heart of a living, working, active landscape valued by everyone.

If you are deaf or have a hearing difficulty you can
contact the Department via the Next Generation Text
Relay Service by dialling 18001 + telephone number.

INVESTORS IN PEOPLE
We invest in people Standard

From the Office of the
Minister of Agriculture,
Environment and Rural Affairs



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Email: private.office@daera-ni.gov.uk

Our Ref: INV-1094-2024
Date: 16 February 2024

Dear Gordon

**INVITATION TO VISIT A MINERAL PRODUCTS ASSOCIATION NI (MPANI)
MEMBER SITE**

Thank you for your email of 9 February 2024 inviting me to visit a Mineral Products Association NI member site and also for sharing the MPANI Briefing Paper and your document highlighting the Mineral Products Industry Priorities for NI Government.

I would be pleased to take you up on this offer of visiting one of your member's sites.

My Diary Manager, [REDACTED], will contact you in due course to make the necessary arrangements.

Yours sincerely

ANDREW MUIR MLA

Minister of Agriculture, Environment and Rural Affairs

Monday 2nd December 2024



Andrew Muir MLA
Minister for Agriculture Environment and Rural Affairs
First Floor, Clare House
Airport Road West
Belfast,
BT3 9ED

Mineral Products Association
(Northern Ireland) Ltd,
Natts Corner Training Centre,
17 Dundrod Road, Crumlin
Co Antrim,
BT29 4SR

Dear Minister,

I trust you are well.

We wrote to you back in February to inform you about the work MPANI are doing on decarbonisation, environmental enhancement and protection. We are also keen to talk to you about how we can re-establish, recognising of course the time pressures and resource issues currently being faced by your officials, the beneficial liaison our Association has had with DAERA and specifically NIEA in the past. We would welcome the opportunity to discuss and brief you on;

1. Decarbonisation and our Net Zero Journey.

- Our role as a partner in the Industrial Decarbonisation NI project.
- Work with Queens University on the use of Biochar in concrete products.
- Potential of Biomethane and use of carbon capture in the production and transport of mineral products.
- The potential use of Green Hydrogen for the production and transport of mineral products.

2. The Environment

- Our support for the establishing of an Independent Environment Protection Agency.
- Support for Biodiversity Net Gain in NI.
- Promoting and supporting environmental best practice across Industry.

We would welcome the opportunity to meet with you and senior officials to discuss the opportunities and challenges presented by the above.

I look forward to your considered reply.

Yours Sincerely

A handwritten signature in dark ink, appearing to read 'Gordon Best', written in a cursive style.

Gordon Best
Regional Director MPANI

MPANI Presentation - 30 January 2025

Reply Reply All Forward ***
Thu 30/01/2025 13:50

MPANI Presentation to DAIRA Jan 25.pdf
pdf file

Hi,

Please see attached slides from today's meeting with MPANI.

Thanks,

[Redacted]

From: gbest@mpani.org <gbest@mpani.org>

Sent: 30 January 2025 12:11

To: [Redacted]

Subject: Presentation

Hi [Redacted] asked me to send this presentation to you for circulation to the attendees at this morning's meeting. Gordon Best Regional Director T: 02890824078 E: info@mpani.org W: www.mpani.org Min

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

sophospSMARTBannerend

Hi [Redacted]

[Redacted] asked me to send this presentation to you for circulation to the attendees at this morning's meeting.

Gordon Best

Regional Director

T: 02890824078 E: info@mpani.org W: www.mpani.org

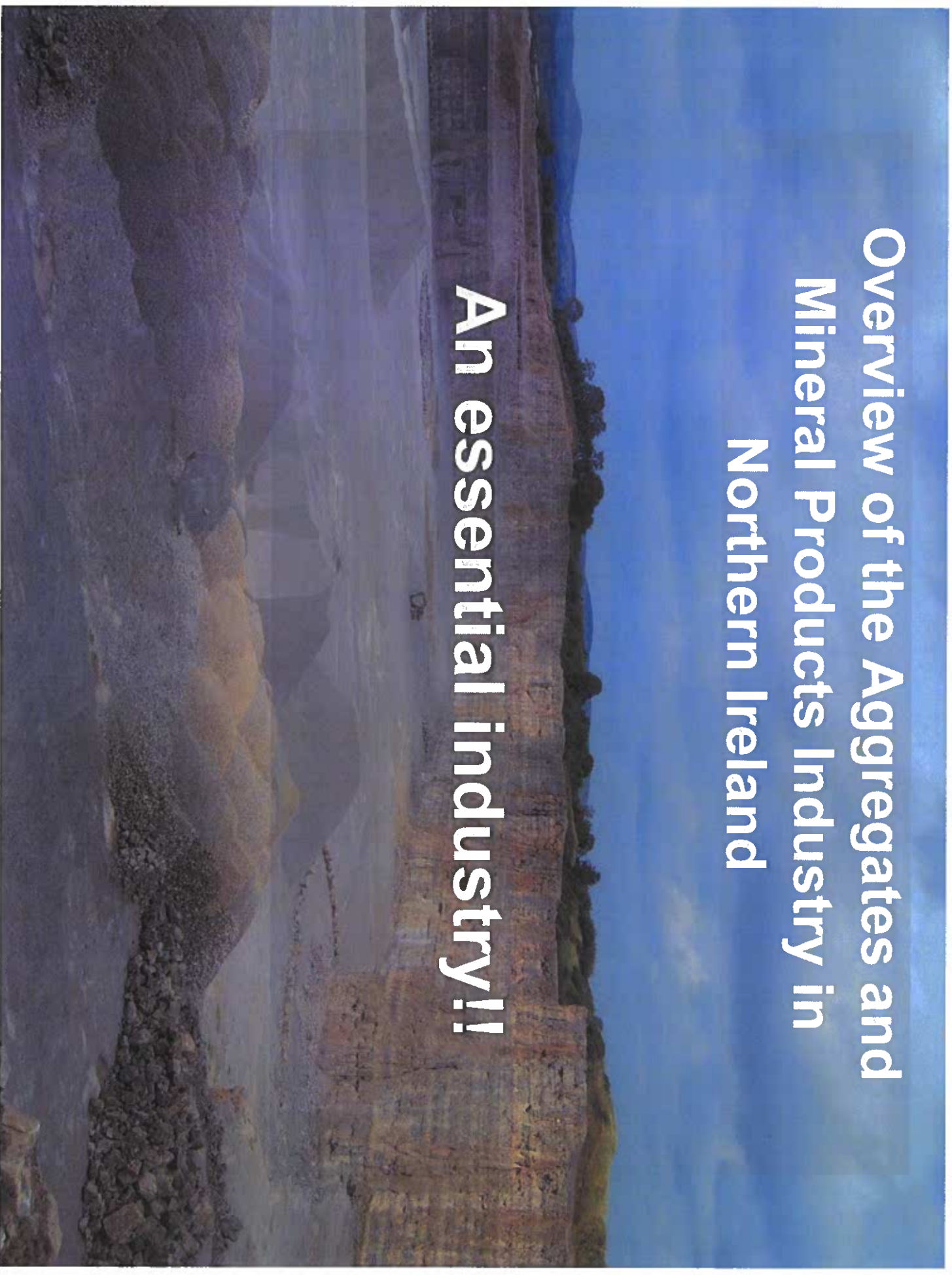
Mineral Products Association (Northern Ireland) Ltd, Unit 10 Nutts Corner Business Park, Dundrod Road, Crumlin, Co Antrim, BT29 4SR



Confidentiality: This e-mail and its attachments are intended for the above name only and may be confidential. If they come to you in error, you must take no action based on them, nor must you copy or show it to anyone. If you have received this e-mail in error please contact us to advise. Registered in Northern Ireland as Mineral Products Association (Northern Ireland) Limited, No. 61329, Unit 10 Nutts Corner Business Park, Dundrod Road, Crumlin, Co Antrim, BT29 4SR

Overview of the Aggregates and Mineral Products Industry in Northern Ireland

An essential industry!!



Mineral Production Association NI

The trade association for companies involved in supplying crushed rock and sand and gravel, asphalt, ready-mixed concrete, agricultural lime, industrial lime, mortar, recycled materials and construction and quarrying plant.

Represent:

62 Mineral Products Companies

32 Affiliate Members

(

MPANI is affiliated to Minerals Products Association and European Aggregates Association (EUPG).

Staff:

Gordon Best

Regional Director

Fiona Taggart

Office Manager

Our Values



- **Health and Safety**
- **Sustainable Consumption and Production**
- **Climate Change and Energy**
- **Natural Resources and Enhancing the Environment**
- **Creating Sustainable Communities**

Why we need Aggregates

Aggregate is a natural resource just like water, forests and farmland, therefore we need to manage it wisely at national, regional and local level.

“Minerals have been extracted from the Earth since prehistoric times and the history of civilization and industrial advancement has been linked with man’s ability to harness and use the materials available to him.”

(BGS (2004) The Economic Importance of Minerals to the UK)

Essential part of modern society and are a vital resource for economic growth and development.

Delivering Northern Ireland's Needs

The Approx Aggregate required in a person's lifetime...

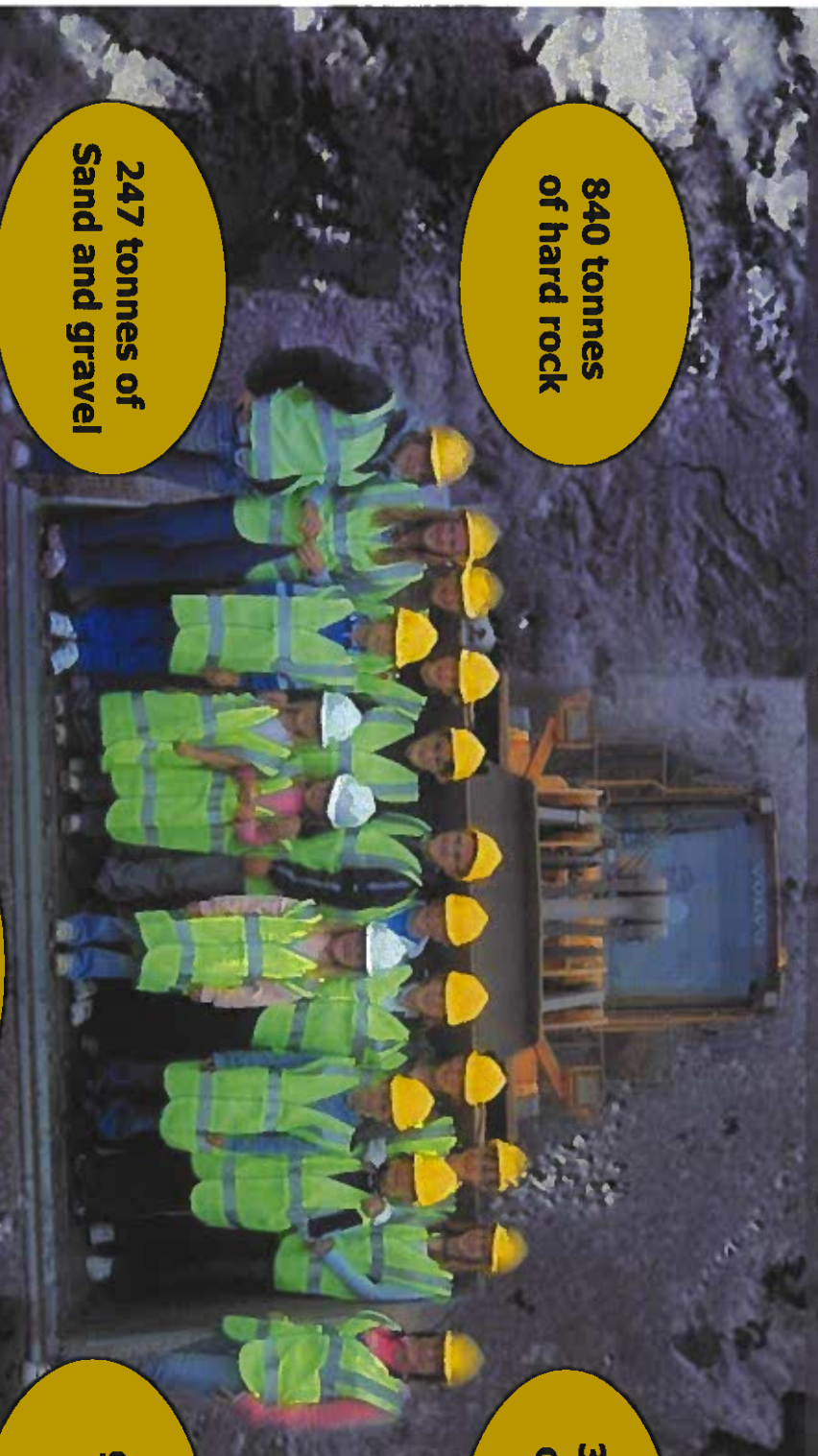
840 tonnes
of hard rock

247 tonnes of
Sand and gravel

42 tonnes
of agricultural lime

329 tonnes
of concrete

95 tonnes
of asphalt



Facts & Figures

- **Average Annual Aggregate Production 22 million tons**
- **Annual Turnover of Quarry Products sector- approx. £750m**
- **(205% of NI GDP)**
- **Employment – approximately 5000 direct employees**
- **The NI Construction Industry is a significant driver of the NI economy and is totally dependant on the supply of quarry products.**
- **The materials we supply help maintain and enhance the quality of life of every man, woman and child in NI.**
- **The construction of an average house requires approximately 60 tonne of aggregate. Add in the roads and services to that house the total required is approx. 100 tonnes.**
- **Every 1km of single carriageway road requires approximately 10k tonne of aggregate, 400m3 of concrete and 4000 tonne of asphalt.**
- **In NI we move approx. 80,000 tonne of mineral products every day, that's 4,000 lorry loads. Parked together they would stretch from**

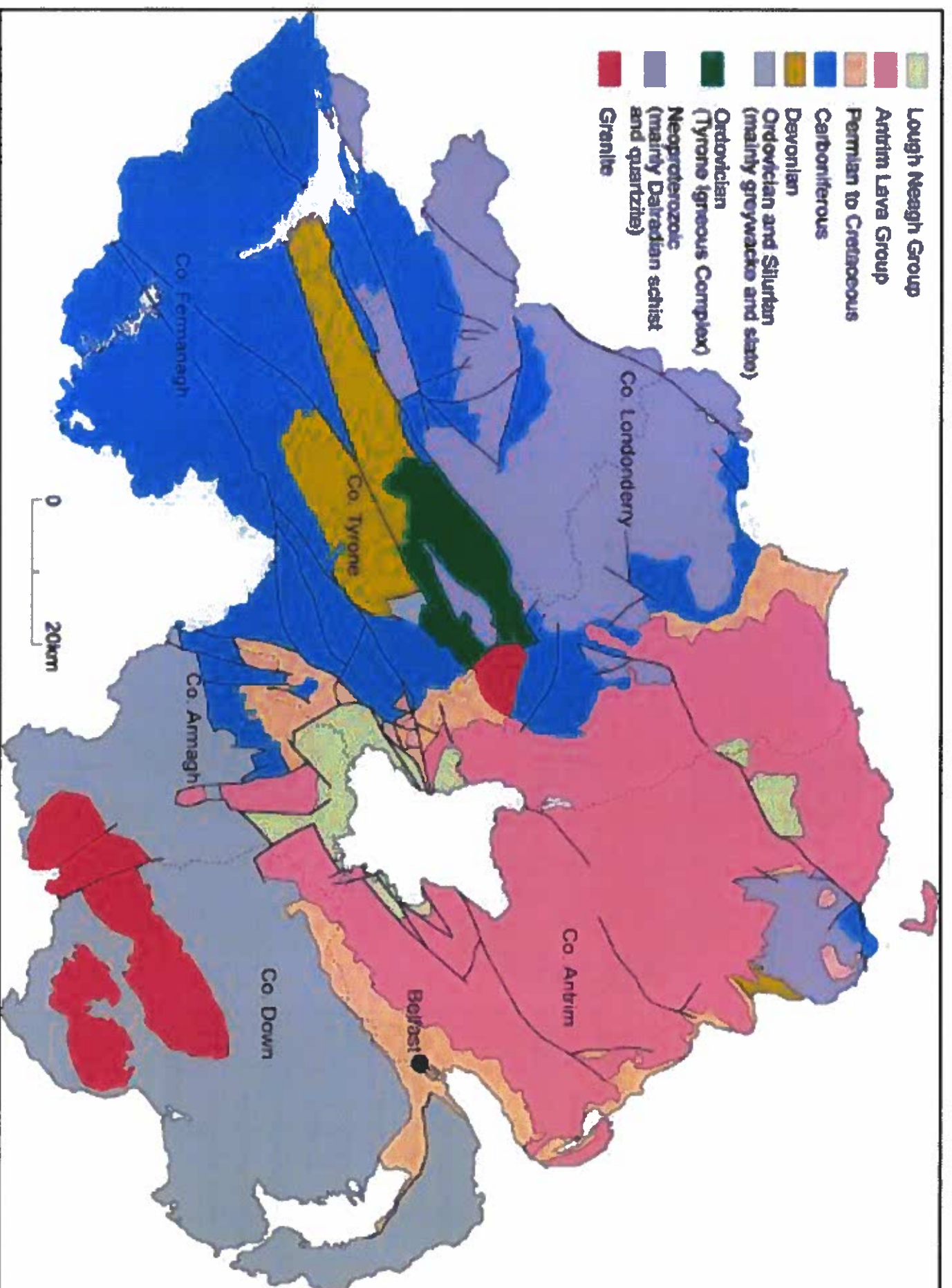
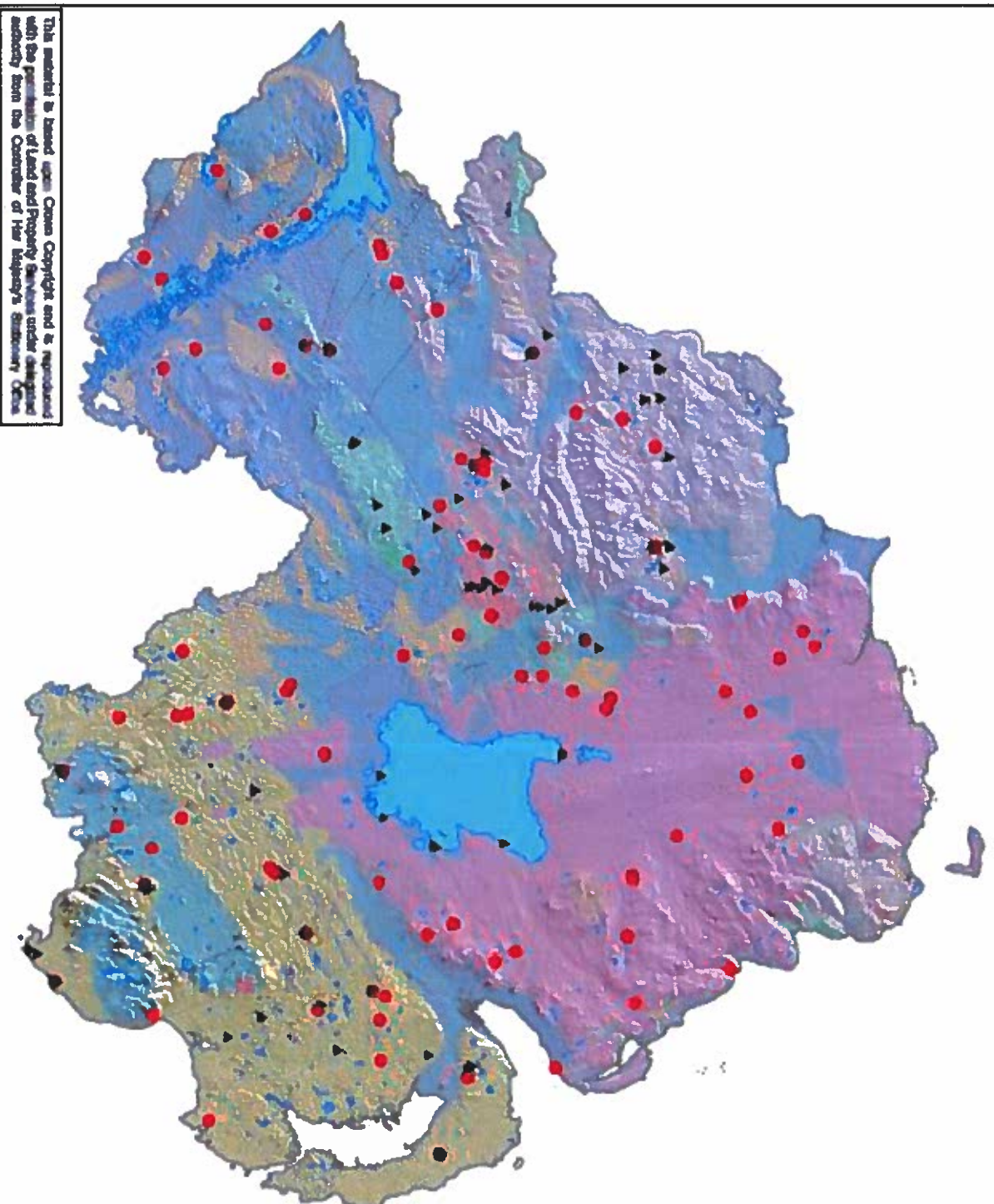


Figure 3: Basic geology map of Northern Ireland's bedrock.

Northern Ireland Simplified Geology and Quarry Locations



Geological Survey of Northern Ireland



This material is based upon Crown Copyright and is reproduced with the permission of Land and Property Services under delegated authority from the Controller of Her Majesty's Stationery Office.

Legend

- ▲ Sand And Gravel Quarries
- Hard Rock Quarries
- Northern Ireland Lakes
- GABBRO
- GRANITE
- BASALT
- ANDESITE
- ACID VOLCANICS
- PSAMMITE
- CONGLOMERATE
- SANDSTONE
- LITHIC ARENITE
- MUDSTONE
- LIMESTONE



Aggregate production by area/ type

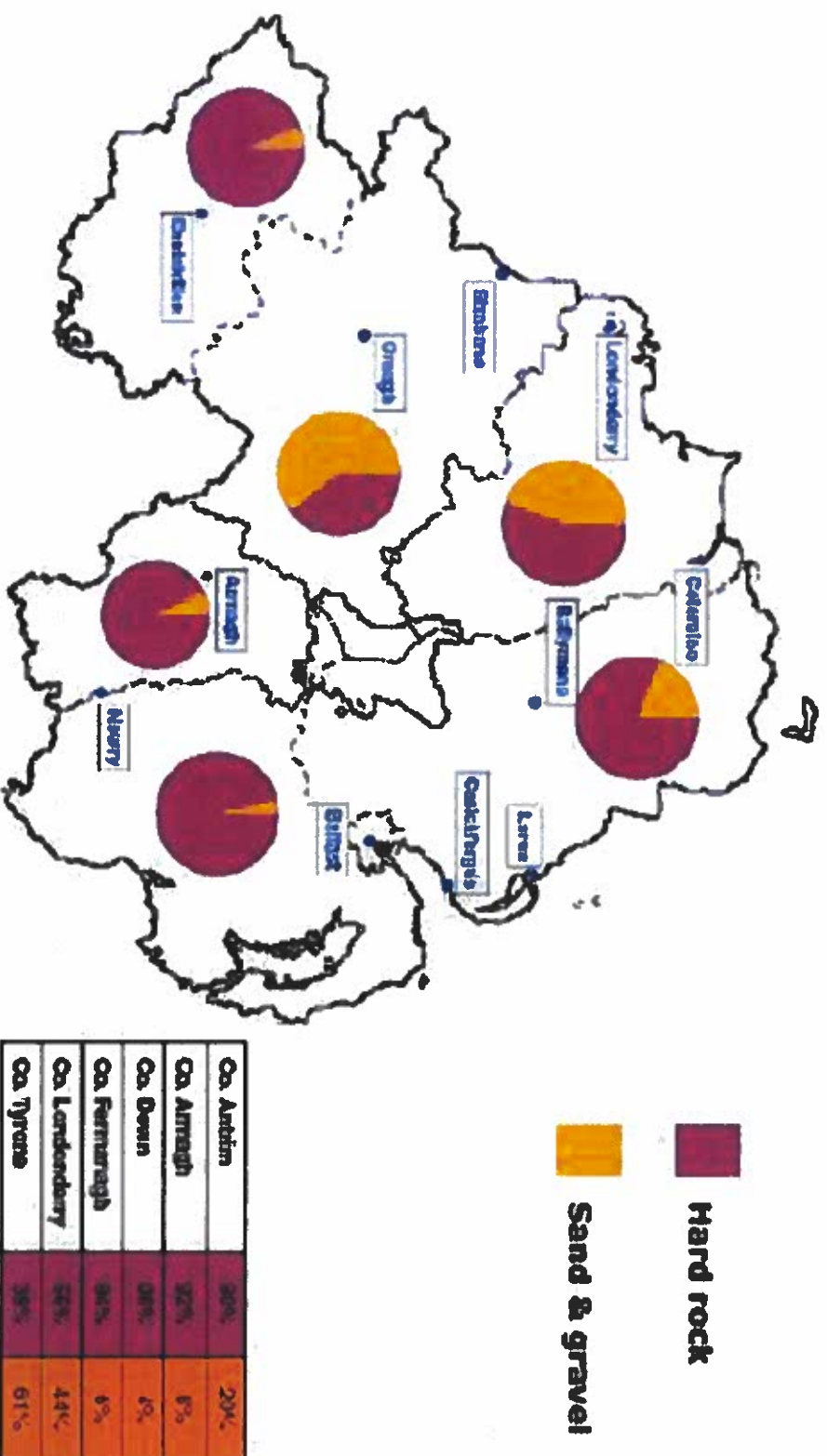


Figure 4: Map of Northern Ireland's six counties showing the production of hard rock and sand & gravel attributable to the local geology.

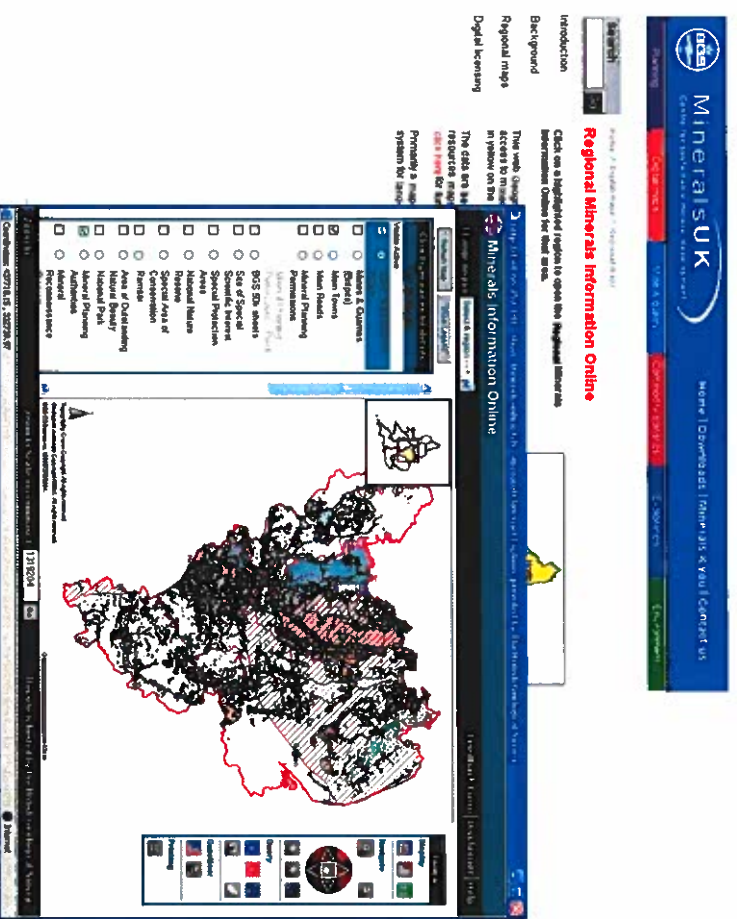
Mineral Information Mapping

Motion from the NI Assembly :

"That this Assembly notes the finite nature of aggregate resources in Northern Ireland; and calls upon the Minister of the Environment to introduce an aggregate mapping programme to ensure the sustainable future of the aggregate and construction industry." **24th April 2008**

- Mapping undertaken by

BGS in 2013 and we now have our own NI aggregates maps.



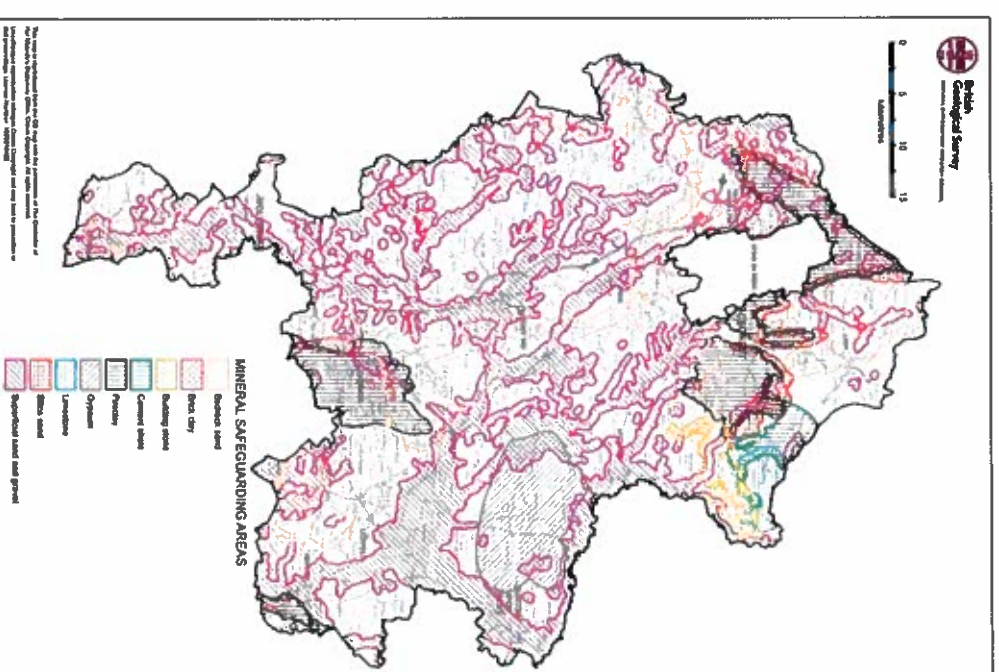
Mineral Information Mapping

Minerals are essential for the development of a modern economy, but their extraction is subject to environmental and other constraints. Bringing together minerals, environmental and other land-use information in an integrated system allows more effective and sustainable management strategies to be developed.

<http://www.bgs.ac.uk/mineralsuk/planning/resource.html>

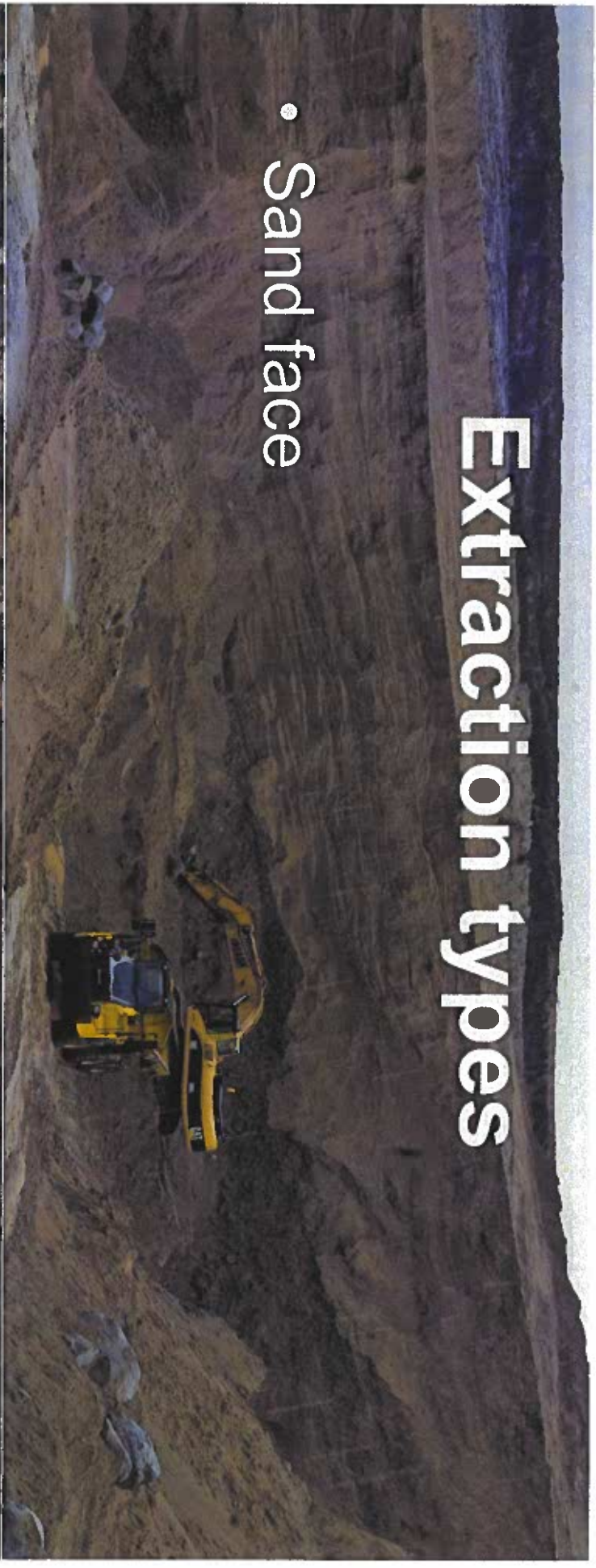
Mineral Safeguarding

- Cumulative impact of other land-use and designations means that options are reducing and will reduce further in the future.
- Danger of sterilising known resources by inappropriate development.
- Sterilisation can divert extraction to other, perhaps more sensitive or costly, locations.

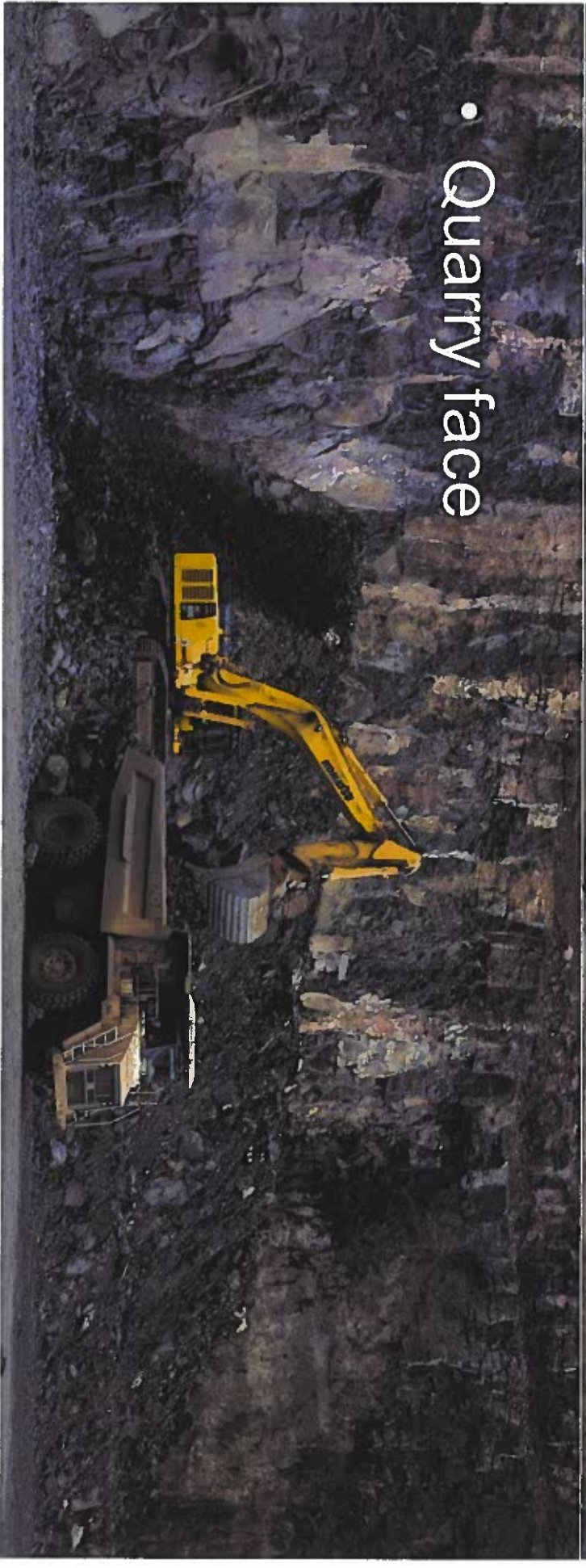


Extraction types

- Sand face



- Quarry face



Blasting

- **Geology of rock**
- **Burden and Spacing**
- **Types of explosives**
- **Depth of holes**
- **Detonation pattern**
- **Vibration and Air Over Pressure**
- **Blasting day (procedure)**
- **Fly rock**



Hydraulic breaker breaking the large blocks before loading



Managing Environmental and Social Aspects of Quarrying

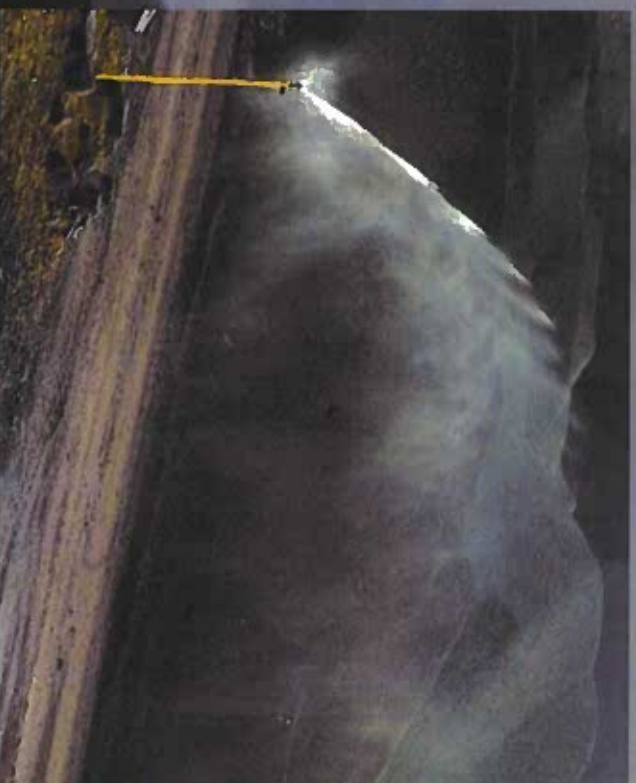
Managing Environmental & Social Aspects of Quarrying

Environmental Topics Addressed in Quarry Related EIA

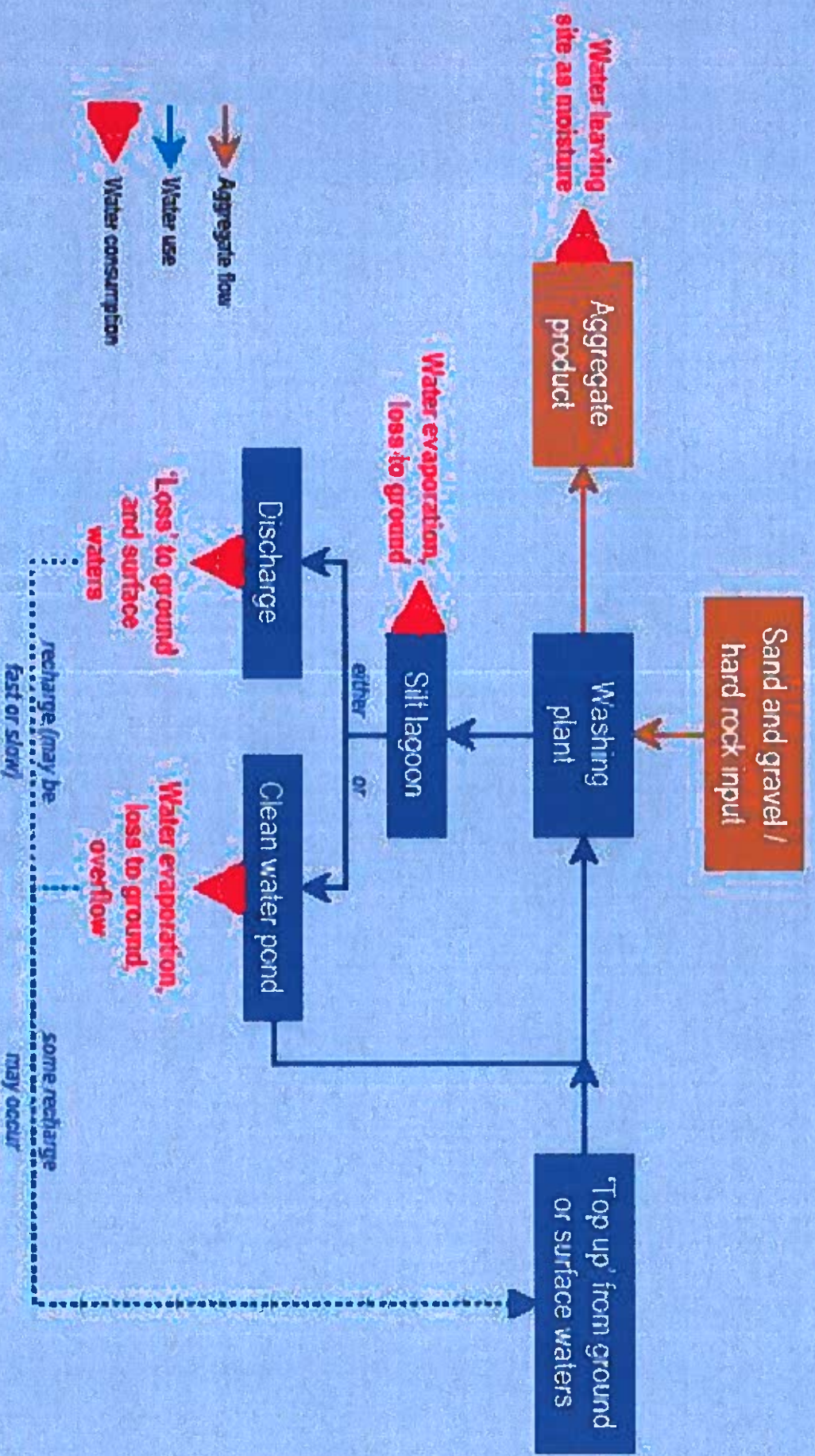
Topics in the EIA Regulations (SI No. 293)	Typical Issue for Quarrying Operations
Population	Noise, dust and vibration, visual impact, traffic and social/economic effects
Flora & Fauna	Biodiversity
Soil	Soil and agricultural land quality
Water	Water resources, abstraction, discharge and water quality
Air	Air Quality
Climate Factors	Air quality, water resources, water quality
Material assests, including the architectural and archaeological heritage	Archaeology and effects on Scheduled Monuments, Listed Buildings and their settings
Landscape	Landscape and visual amenity

Controlling Dust

- Machinery Exhausts fitted correctly
- Minimise need to transport around site
- Dust Suppression watering techniques
 - Bowsers
 - Automated water atomising sprays



Water Use & Water Consumption



Sources of Water

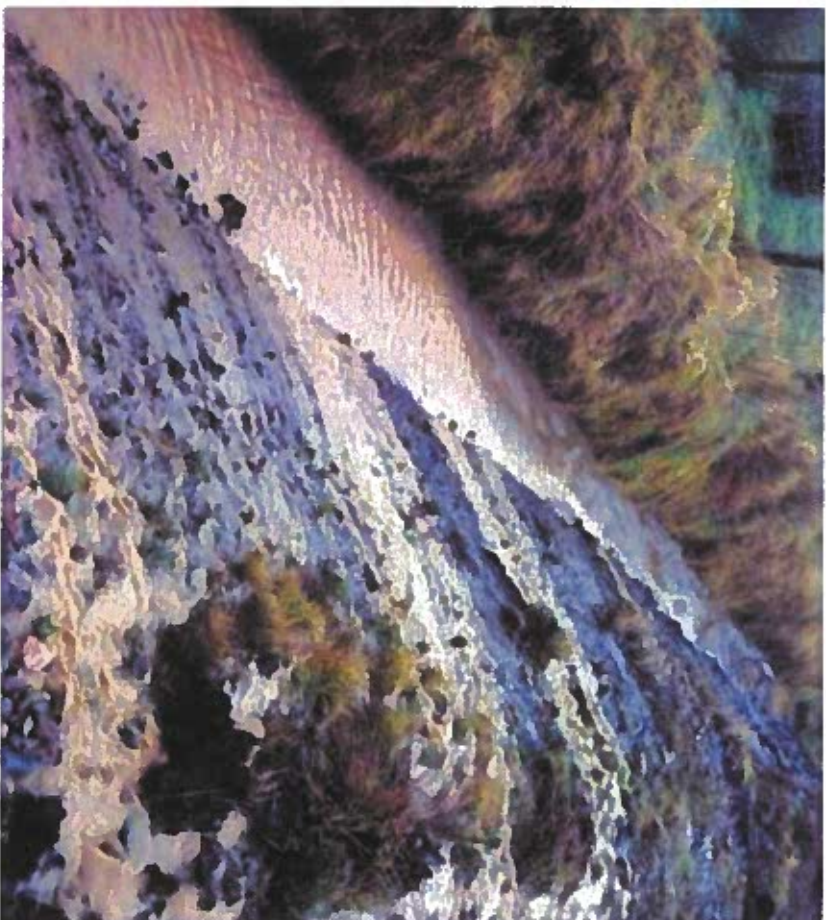
- Run-off (or streamflow)
- Groundwater ingress
- Direct rainfall (sump)
- Rivers
- Boreholes/ Wells



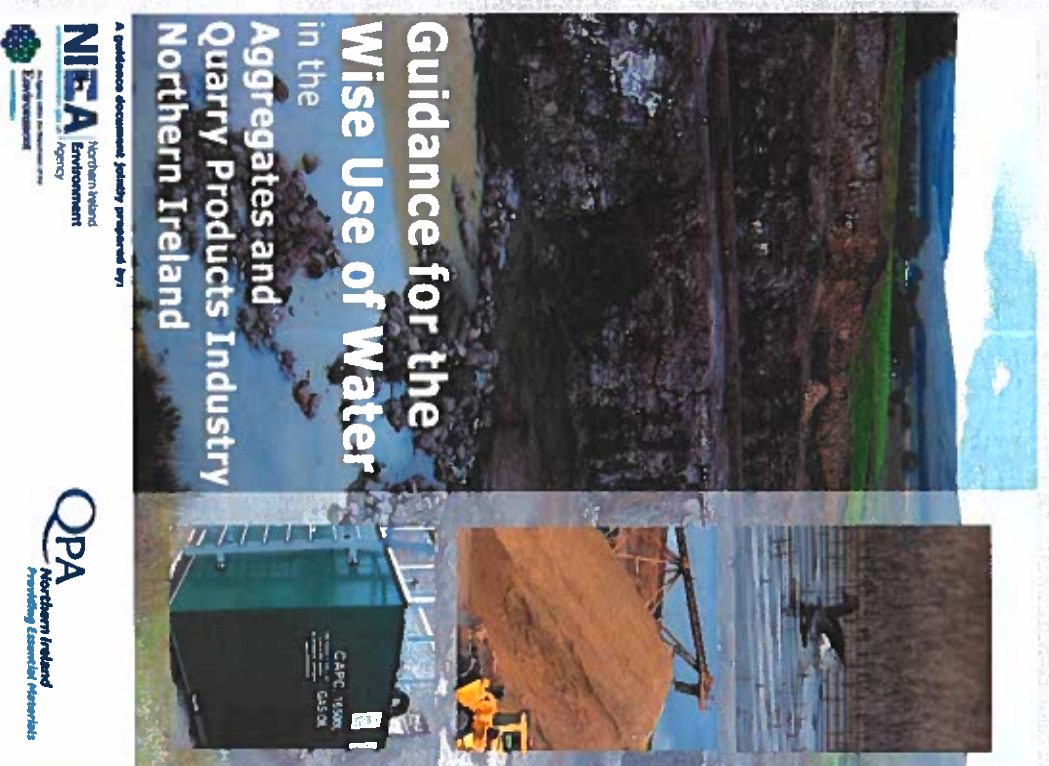
Water Usage



Pollution risks – dirty water



Wise Use of Water



A guidance document jointly prepared by:

NIEA Northern Ireland
Environment
Agency

OPA Northern Ireland
Providing Essential Services



Meet the neighbours...

Working with Wildlife

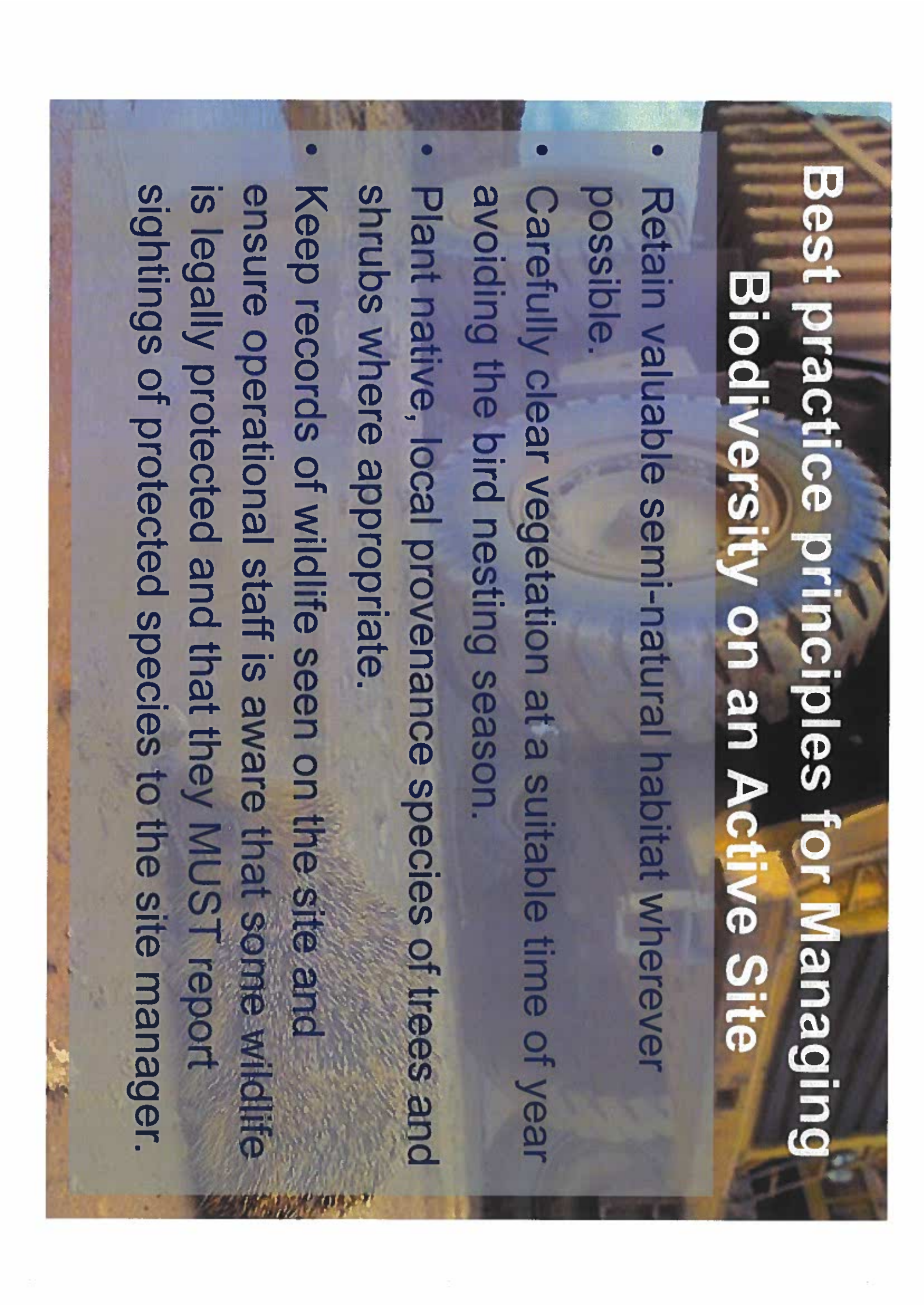


Biodiversity in Our Industry

Diversity of wildlife habitats in our management...



...is a by-product of our industry!



Best practice principles for Managing Biodiversity on an Active Site

- Retain valuable semi-natural habitat wherever possible.
- Carefully clear vegetation at a suitable time of year avoiding the bird nesting season.
- Plant native, local provenance species of trees and shrubs where appropriate.
- Keep records of wildlife seen on the site and ensure operational staff is aware that some wildlife is legally protected and that they MUST report sightings of protected species to the site manager.

**NO
ACCESS
OTTER
PROTECTION
ZONE**

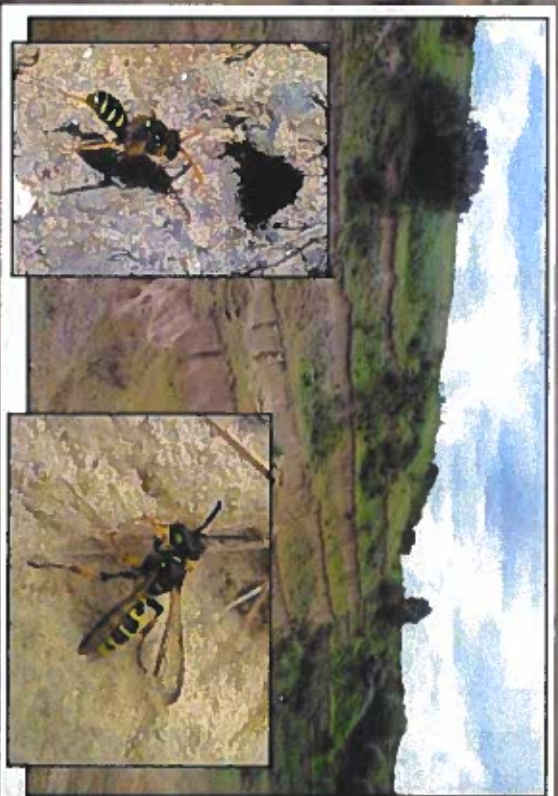
**Sand Martin
Habitat**



DO NOT DISTURB

BREEDING

BAP Habitat: Open *Mosaic* Habitats on *Previously Developed land*



Biodiversity Action Plan Guidance

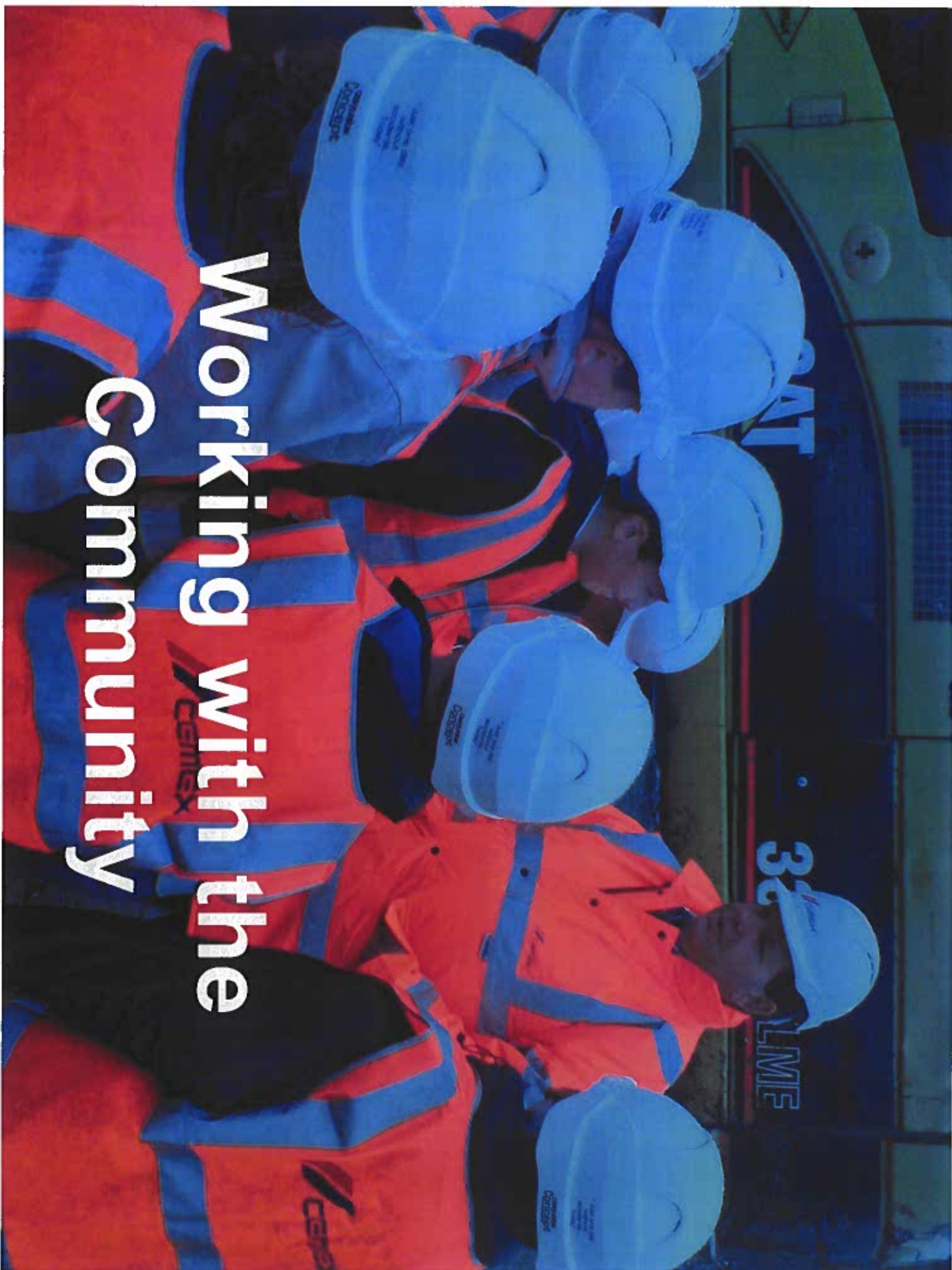
MARCH 2019



BIODIVERSITY ACTION PLANS/MANAGEMENT PLANS MPA GUIDANCE FOR MEMBERS

essential materials
sustainable solutions





Working with the Community

Interested Parties

- **Local Residents**
- **Schools**
- **Colleges**
- **NGOs**
- **Raptor Study Group**
- **Interest Groups/
Societies**
 - **Geologists**
 - **History**
 - **Natural History**



What is Net Zero?

It's not a canvas!!



It's a picture of many parts!!

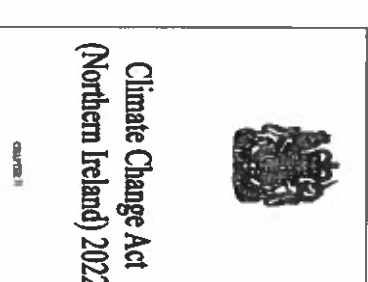
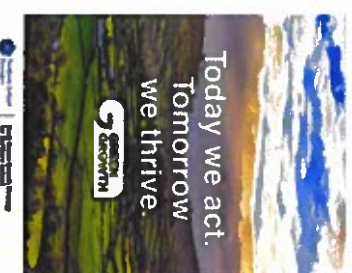


Northern Ireland
essential materials
sustainable solutions

National and Local Overview

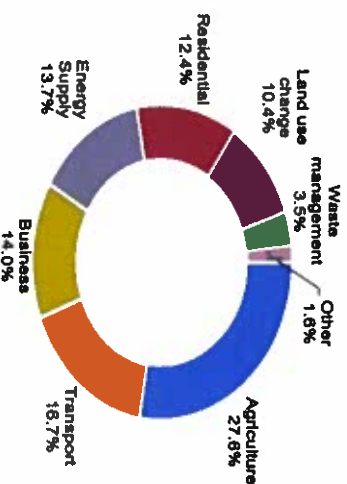


The Strategic Context



Emissions by Sector

Figure 3: Greenhouse gas emissions by sector (%)¹¹
Northern Ireland, 2021



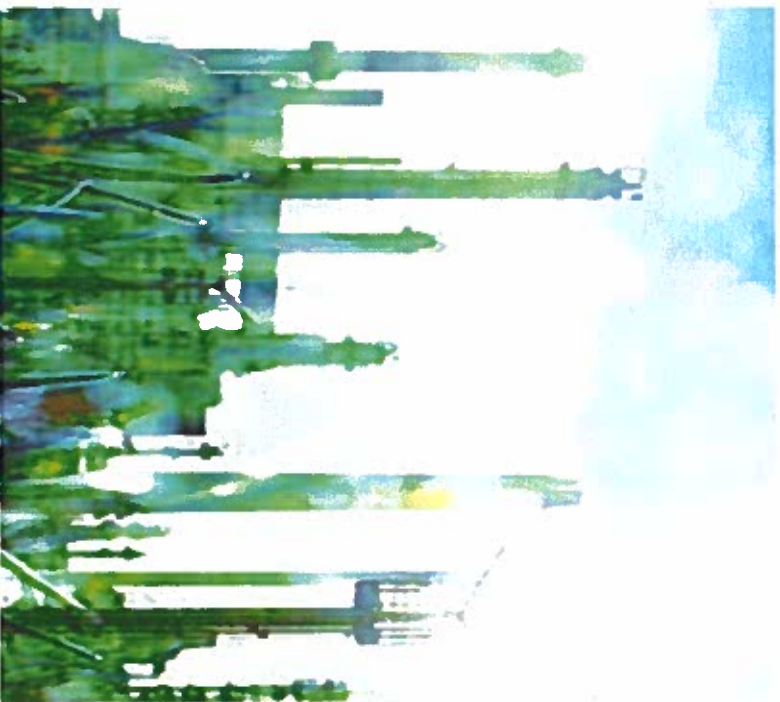
Key Targets

Northern Ireland has set out several ambitious strategies such as 10X Economy, Energy-Path to Net Zero, Climate Change Act and forth coming Green Growth Strategy.

Which have key green growth targets:-

- At least 80% of electricity consumption to come from a diverse mix of renewable sources by 2030.
- Double the size of our low carbon and renewable energy economy by 2030.
- Green House Gas Emissions to be 48% lower than a 1990 baseline by 2030 and Net-zero emissions by 2050.
- Deliver energy savings of 25% from buildings and industry by 2030.

WHAT ARE WE PLANNING?



INDUSTRIAL DECARBONISATION FOR NORTHERN IRELAND (ID-NI)

The result of a successful application to Innovate UK's Local Industrial Decarbonisation Programme.

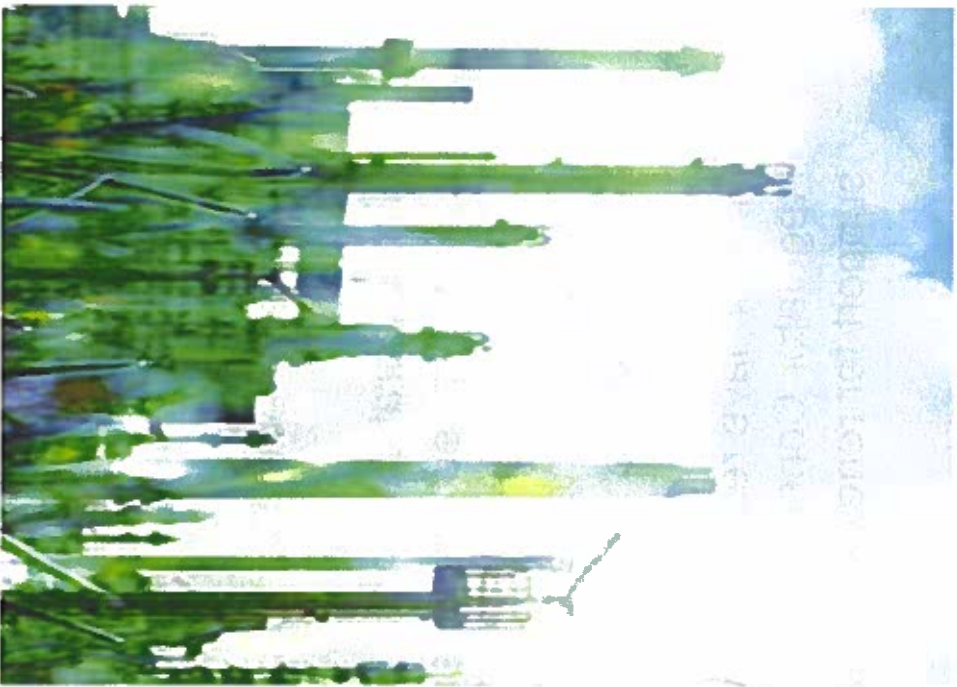
PARTNERS:

Invest NI – Lead partner using connections with all 11 NI councils/DfE/DAERA and other utility stakeholders to influence policy

Mineral Products Association of NI/Manufacturing NI – bringing industry challenges/expectations/voice to the project

Black Country Industrial Cluster – Previously delivered a highly acclaimed GB based RePowering the Black Country Project in Midlands. Pre-developed platform being adapted

Queens/Ulster University – Smart data analytics, energy auditing, digitalisation experience



What will ID-NI give industry?

1. A detailed Local Industrial Decarbonisation Plan for NI (ID-NI), to support industrial decarbonisation to 2030
2. Energy audits and assessments of up to 50 manufacturing sites in identified mini-clusters across NI
3. Practical tools to help industry improve productivity, reduce energy consumption and decarbonise
4. A new energy mapping initiative, informing policy, planning and investment decisions to 2030 and beyond
5. A knowledge sharing platform highlighting energy savings, net zero technologies, best practice and outcomes to date
6. Shared resources, guidance on accelerating decarbonisation, **funding options**, support mechanisms, collaboration opportunities and information.
7. Digital twins of decarbonisation models to inform industry of technologies and pathways
8. Productivity & Emissions Tool for participating cluster businesses to trial
9. Direct access to industry partnership opportunities in the Black Country
10. A series of workshops across all 11 councils outlining ambitions and showcasing net zero technologies
11. Adapted according to industry needs

What are MPANI and members doing at present?

In terms of energy efficiency and saving power we have been “doing it for years!!”

Biggest user of Carbon Trust and Invest NI support.

Already grabbed most, if not all, of the “low hanging fruit”. LED lighting, variable speed drives, electric cars and vans!!

MPANI lobbying hard with Energy Regulator and Department for the Economy on changes to connection to the grid charging.

MPANI have responded to a number of Government and Energy Regulator Consultations to enable Members to connect to the grid and get support for renewable technologies.

What are MPANI and members doing at present?

Working with innovative and award winning Company Catgen

A number of members have been successful in being awarded funding for a range of projects. FP McCann, Mannok, Maccrete.

<https://www.gov.uk/government/publications/industrial-energy-transformation-fund-ietf-competition-winners>

Mannok have launched their Hydrogen Valley Project. See [Mannok Set to Generate Renewable Energy with Recent Government Green Hydrogen Fund - Mannok \(mannokbuild.com\)](#)

Breedon Cement received £230k to look at carbon capture technology at their Hope Site in Derbyshire.

Further opportunities

- **Net zero roadmaps:**
 - Asphalt
 - Silica sand
 - Aggregates
 - Transport including non-road mobile machinery
- **Carbon measurement tools**



UK Research
and Innovation



ICREAGH
INNOVATION IN CONCRETE



MACRETE
PRODUCT FOR INFRASTRUCTURE



MC
tpmccann



Toomebridge



SPECTRUM



SPECIFAB

Coalisland



DUPONT

FAST



Coolkeeragh



AXON



Unenergy Through Energy



Granville dale farm

YOUR DAIRY CO-OPERATIVE

Camirus



mpa
Northern Ireland
essential materials
sustainable solutions



Pro Enviro
ENGINEERING A GREENER WORLD



Industry Priorities

Health and Safety

www.safequarry.com

Climate Change

Industry action on climate change and decarbonisation.

[Net Zero Carbon](#)

mineralproducts.org

Being Good Neighbours

MPA is currently piloting the Good Neighbour Scheme to help its members continue to build trust with their local communities.

Why do we need partnership between Industry and the Regulator?

**Education and awareness to enable
everyone to do their job better?**

**Ensure a better environment and stronger
economy!**

Why do we need strong but fair enforcement?

Protect responsible operators and the jobs of their employees .

Protect our eco-systems and the wider environment.

Prevent accidents and save lives.

Our Wish List

- More investment in the planning process, particularly statutory consultees and retention of expertise.
- Central shared service for mineral and waste planning.
- A managed aggregate supply system.(MASS).
- A review mechanism whereby environmental conditions on quarry sites can be assessed and kept up to modern standards.
- A working partnership with planners and statutory consultees.

Our Vision for 2050

- Resources of construction materials are identified, mapped and protected for future sustainable use.
- Only mineral operations complying with the highest standards of well being, health and safety, environmental management, energy efficiency and social value principles will be permitted.
- Operations will be carbon neutral, mostly automated and be managed, operated and maintained by diverse, skilled and well paid teams of valued colleagues.
- Resource efficiency will be the norm.
- The minerals sector will be viewed as essential, a good employer and a good neighbour.

More Information

- [Net Zero Carbon](#)
- [Natural Environment](#)
- [Climate Change & Energy](#)
- [50 Years of 'Net Gain'](#)
- [Biodiversity | MPA NI](#)
- [Proud of our Past. Embracing our Future | MPA NI](#)



Department of

**Agriculture, Environment
and Rural Affairs**

An Roinn

**Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe**

Depairtment o'

**Fairmin, Environment
an' Kintra Matthers**

www.daera-ni.gov.uk

MEETING NOTE: 30 Jan 2025

INV Number: INV-1094-2024

TITLE/ORGANISATION:		Meeting with the Mineral Products Association NI		
VENUE:	☐ Parliament Buildings	☐ Clare House	☐ OTHER:	☒ Virtual
LIST OF ATTENDEES:				
OFFICIALS:				
OTHERS:	Gordon Best (MPANI) Paul Hamill (FP McCann) Russel Drew (Breedon) Rebecca Mitchell (Northstone)			
KEY POINTS DISCUSSED: • GB outlined that he would like to reset the working relationship with NIEA. • GB delivered a presentation on the aggregates and mineral products industry in NI including industry priorities and vision for 2050. • Breedon, F P McCann and Northstone discussed their biodiversity action plans, work to enhance biodiversity, reducing emissions, including from vehicles, and how the industry is working towards net zero. •  advised that anyone producing hydrogen is required to have a PPC permit.  is willing to do a presentation for MPA members to advise of requirements. The presentation could include IPRI considerations including dust.				

• GB offered to facilitate an information session on the industry for new NED and WMU staff if that was useful. • GB would like to get the Wise Use of Water in the Aggregates and Quarry Products Industry guidance booklet reviewed and if necessary updated and issued. • GB advised that only a few planning agents have stated timescales for planning applications are too long. [REDACTED] stated that NED are always open for knowledge exchange between teams. [REDACTED] also welcomed the joint MPA meeting with NED teams and suggested meeting once a year.	
ISSUES AGREED: (must be completed) • The MPA and NED meetings to be reconvened.	
ACTION POINTS / OFFICIAL RESPONSIBLE: • ACTION 1: Wise Use of Water in the Aggregates and Quarry Products Industry guidance booklet reviewed and if necessary updated and issued. – RS	
Notes written by - [REDACTED]	DATE: 30 Jan 2025



CBAM & EBAM: A Serious Competitiveness Risk for Northern Ireland

Briefing note for MLAs, MPs and Ministers

What is CBAM and EBAM?

- The EU Carbon Border Adjustment Mechanism (CBAM) applies a carbon cost to certain imported materials such as cement, steel, aluminium and fertiliser, to prevent carbon leakage.
- The UK Emissions Border Adjustment Mechanism (EBAM) is the UK's proposed equivalent, expected to apply to similar energy-intensive materials.

Both mechanisms are intended to protect domestic industry — but Northern Ireland is uniquely exposed.

Why Northern Ireland Is Different

Northern Ireland:

- Remains aligned to EU single-market rules for goods, and
- Is part of the UK internal market

IMPACT - This creates a real risk that NI businesses face both EU CBAM and UK EBAM obligations, a situation faced by no other region.

Key Challenges for Northern Ireland Industry

1. Risk of Double Regulation and Double Cost

Without explicit exemptions or mutual recognition:

- NI businesses may have to comply with EU CBAM reporting

- And also face UK EBAM charges on the same materials

IMPACT - This would place NI at a structural disadvantage.

2. Disproportionate Burden on SMEs

NI construction materials producers and quarry operators would need to:

- Track embedded carbon across GB, EU and global supply chains
- Obtain verified emissions data from suppliers not set up for CBAM
- Manage two separate and evolving regimes

IMPACT - This is a significant administrative and financial burden, particularly for SMEs.

3. Loss of Competitiveness

- GB firms selling only into GB may face lower compliance costs
- Republic of Ireland firms deal with one clear EU system
- NI firms face complexity, uncertainty and higher cost

IMPACT - This risks investment leakage away from Northern Ireland.

4. Damage to NI–GB Trade

If EBAM is poorly designed:

- NI products sold into GB could become less competitive
- GB buyers may switch suppliers
- NI's role in UK infrastructure supply chains could weaken

This would represent internal UK carbon leakage, directly undermining the policy's purpose.

5. Policy Uncertainty Is Already Harming Decisions

Businesses still lack clarity on:

- Whether NI will be exempt from UK EBAM
- Whether EU CBAM compliance will be recognised by the UK
- How NI–GB movements will be treated in practice

IMPACT - This uncertainty is delaying investment, pricing and decarbonisation decisions now.

What NI Industry Is Asking For?

MPANI members are calling for:

1. No double charging for Northern Ireland
2. Full mutual recognition between EU CBAM and UK EBAM
3. Simplified treatment for NI-GB movements
4. Proportionate reporting requirements for SMEs
5. Clear, NI-specific guidance well in advance of charges

Why This Matters

If not addressed, CBAM and EBAM risk:

- Higher construction costs
- Reduced competitiveness for NI manufacturers
- Weaker supply chains for housing and infrastructure
- Diverting investment from real decarbonisation into compliance

IMPACT - This is an economic and constitutional issue, not just a climate policy issue.

If you require any further information on this matter please contact [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: UK /EU Carbon Border Adjustment Mechanism - link with plans to expand scope of UK ETS to domestic maritime sector
Date: 25 February 2026 15:38:00

Hi [REDACTED], many thanks again for the catch up yesterday. I wanted to follow up with you in relation to the links with UK ETS linking, CBAM exemptions and the planned extension of the UK ETS to cover domestic maritime emissions.

You may be aware that, following public consultation in 2024, the UK Emissions Trading Scheme (ETS) Authority, comprised of the UK, Scottish and Welsh Governments, and DAERA, in responses to that consultation in July and November 2025, signalled the intention to include domestic maritime emissions within the scope of the UK Emissions Trading Scheme with effect from 1 July 2026.

Internal analysis undertaken by the UK ETS Authority alongside the policy development process, and emerging data from the EU, has indicated that cost impacts as a result of this policy position, whilst hard to quantify, are expected to be minimal.

The plan is that the UK ETS Authority will review the position in 2028, which will look at thresholds, exemptions and wider socio economic impacts of inclusion and the differing capabilities of sectors to decarbonise.

Legislation has now been laid in all four parliaments of the UK to give legal effect to that decision. This legislation has now been passed by the UK House of Commons, and the Scottish Parliament and Welsh Senedd. It will be the subject of plenary debate at the Northern Ireland Assembly on 10 March.

You will also be aware that negotiations have commenced between the UK Government and the EU with a view to establishing a link between their respective Emissions Trading Schemes as soon as feasible. The Common Understanding published following the UK-EU summit on 19th May 2025 stated that the sectors falling in the scope of an ETS linking agreement should be clearly defined to avoid risks of carbon leakage and competitive distortions. It goes on to say that the sectors within scope should include, inter alia, domestic and international maritime transport. Inclusion of maritime emissions in the UK ETS is therefore essential for linking the UK ETS and EU ETS. Linking will facilitate an exemption from the EU carbon border adjustment mechanism (CBAM), removing a major barrier to trade and lowering costs for UK businesses. UK exports of goods in scope of EU CBAM are worth almost £7bn, and without a CBAM exemption, UK exporters could face large admin and direct costs, with such revenues flowing to the EU.

Given the link to our conversation yesterday, I wanted to keep you in the loop. We have also advised [REDACTED] Manufacturing NI.

More than happy to discuss in more detail if that would be helpful at all.
Many thanks

[REDACTED]

From: [REDACTED]
Sent: 24 February 2026 16:07
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: UK /EU Carbon Border Adjustment Mechanism

Hi [REDACTED], many thanks for the call just now, appreciated, good to catch up.

As discussed, we would be happy to facilitate a meeting with you and others to discuss industry views/concerns on CBAMs and the implications for NI. If you could let me know some suitable dates we can get something set up.
Many thanks

[REDACTED]

[REDACTED]



Department of
**Agriculture, Environment
and Rural Affairs**
www.daera-ni.gov.uk

An Roinn
**Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe**

Department of
**Fairmin, Environment
an' Kintra Matthers**

Sent: 20 February 2026 12:32

To: [Redacted]

Cc: [Redacted]

Subject: RE: UK /EU Carbon Border Adjustment Mechanism

Many thanks for passing on [Redacted] appreciated.

I'll set up a call for Tuesday.

Many thanks

[Redacted]

From: [Redacted]

Sent: 20 February 2026 12:20

To: [Redacted]

Cc: [Redacted]

Subject: RE: UK /EU Carbon Border Adjustment Mechanism

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [Redacted]

Tuesday at 3.30pm would suit well. I have attached a copy of the slides from yesterdays workshop. It was very informative and detailed. Invest NI have a good article on NI Business Info.

[Redacted]

From: [Redacted]

Sent: 20 February 2026 11:57

To: [Redacted]

Cc: [Redacted]

Subject: RE: UK /EU Carbon Border Adjustment Mechanism

Thanks [Redacted] We're hoping to get to at least one of the workshops- we haven't been involved in their organisation however.

In terms of availability for next week, I'd be available at the following times:

Tuesday - after 3.00
Wednesday - 11.30-12.30
Thursday - 9.00-10.00 or after 4.00

If you let me know if any of those days/times suit, I'll set up a Teams.
Many thanks

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Re: UK /EU Carbon Border Adjustment Mechanism

[REDACTED]

Happy to discuss. Let me know your availability next week.

Are you or any of your team attending the InvestNI CbAM workshops??

[REDACTED]

Sent from my iPhone

On 18 Feb 2026, at 18:27, [REDACTED]

Thanks [REDACTED]

I agree with the points you make below. The point of the briefing paper was to get the message across to our politicians that Industry needs the Uks EBAM to be fully aligned with the EU CBAM to avoid unnecessary costs and administration for NI Businesses. Its vitally important that we have collective action by the Executive and Assembly to make sure this "full alignment" happens. We also make the point that this matter should not be politicised as it is too important for the NI Economy

Best wishes

[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

<image002.gif>

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: 18 February 2026 16:23
To: [REDACTED]
[REDACTED]

Subject: UK /EU Carbon Border Adjustment Mechanism

Hi [REDACTED] hope you're keeping well?

Minister Muir's office has forwarded me the attached correspondence on the EU / proposed UK CBAMs. Although UK Government lead on CBAM policy development, my team are regularly engaged due to the interaction with the UK and EU ETS carbon prices.

The EU CBAM does not apply on imports into NI, as it has not been added to the scope of the Windsor Framework. It will be the UK CBAM which applies to imports here, following its planned implementation from January 2027.

You're most likely aware that negotiations have commenced between the UK Government and the EU with a view to establishing a link between their respective Emissions Trading Schemes as soon as is feasible. This should provide the conditions for mutual CBAM exemptions.

It may be helpful to arrange a call to discuss- I can set up if that would be helpful?
Many thanks

[REDACTED]

[REDACTED]

[REDACTED]

<image003.jpg>

From: [REDACTED]
Subject: CBAM
Date: 24 May 2024 11:59:40
Attachments: Draft_ACL.pdf
Amend.pdf
CBAM + CBAM Review for NI in ETS and History.pdf

Hi [REDACTED], hope all well with you?

I'm contacting you to make you aware of an ongoing EU consultation on EU CBAM (apologies if you're already aware), relating to the taking into account of the carbon price paid in a non-EU country for the purposes of calculating CBAM obligations. Attaching as pdfs as well as linking below.

Topic	Type of act	Title	Summary	Feedback period	Link
Climate action, Customs, Energy	Implementing regulation	Carbon border adjustment mechanism (CBAM) – carbon price paid in a third country	This initiative will set out rules for converting into a corresponding number of carbon border adjustment mechanism certificates the carbon price paid in a third country for declared embedded emissions, taking into account any form of compensation available in that country resulting in a reduction of the price.	13 May 2026 - 10 June 2026	Link

Please also see below the latest lines/advice with which we have been provided by UKO, in the context of the MPANI briefing shared with NI political representatives earlier this year:

1. Risk of double regulation and double cost

The UK CBAM will be a charge on the emissions embodied in relevant imports into any part of the UK, including Northern Ireland, that take place on or after 1 January 2027. The EU CBAM has applied fully from January 2026. It does not apply in Northern Ireland. The EU CBAM has not been added to the Windsor Framework and any request to do so would require UK agreement and would need to be in line with the democratic safeguards of the Windsor Framework. Therefore, importers of CBAM goods into Northern Ireland do not need to apply for EU CBAM authorisation or comply with EU CBAM requirements. From 1 January 2027, the UK CBAM will apply across the whole of the UK, including Northern Ireland, ensuring consistent requirements for businesses.

2. Disproportionate burden on SMEs

To support businesses complying, CBAM will be operationalised in line with other domestic indirect taxes. This means many of the registration, accounting and payment processes should be familiar to UK businesses. Where it is not possible for businesses to obtain their actual emissions data for reporting purposes, default emissions values will be made available. HMRC will also publish detailed guidance on complying with CBAM from Summer 2026, working closely with key stakeholders to ensure the guidance is comprehensive and easy to understand in advance of publication.

3. Loss of Competitiveness

CBAM is an environmental measure, designed principally to mitigate against carbon leakage risk. It is designed to apply a carbon price on imports which reflects the carbon price which would have been paid on imported goods had they been produced in the UK and also subject to domestic carbon pricing policy (the UK Emissions Trading Scheme – ETS). UK CBAM will apply across the UK, including Northern Ireland. This means that CBAM will apply on goods imported into the UK, regardless of whether they are imported into, and released onto the market for free circulation in NI or GB. Furthermore, goods moved between NI-GB will not be subject to CBAM.

4. Damage to NI-GB trade

Goods moved between NI-GB will not be subject to UK CBAM.

5. Policy uncertainty is already harming decisions

The EU CBAM has applied fully from January 2026. It does not apply in Northern Ireland. The EU CBAM has not been added to the Windsor Framework and any request to do so would require UK agreement and would need to be in line with the democratic safeguards of the Windsor Framework. Therefore, importers of CBAM goods into Northern Ireland do not need to apply for EU CBAM authorisation or comply with EU CBAM requirements. From 1 January 2027, the UK CBAM will apply across the whole of the UK, including Northern Ireland, ensuring consistent requirements for businesses.

UK-EU Future Relationship – Emissions Trading and CBAM

You may also be aware that, following the UK-EU Summit on 19 May 2025, both the UK and the EU committed to work towards establishing a link between their respective carbon markets by way of an agreement linking UK Emissions Trading Scheme (UK ETS) and the EU Emissions Trading System (EU ETS). Negotiations between the UK and EU to pursue a link are now under way, and both parties have set out their aim of concluding talks in time for the next UK-EU Summit, the date for which has not yet been agreed. Such a link should create the conditions for mutual exemptions from each parties respective Carbon Border Adjustment Mechanism, once such an agreement is in force.

I hope that this information is helpful, and happy to discuss if that would be useful.
Many thanks

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Subject: [REDACTED] Re: CBAM
Date: 19 June 2026 07:00:01

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

[REDACTED]

Good morning. In relation to the DESNZ low carbon products consultation I checked with my colleagues in MPA London and they are already in discussions with them on that so I'm happy to let them deal with it.

Many thanks and chat soon

[REDACTED]

Sent from Outlook for iOS

From: [REDACTED]
Sent: Tuesday, 16 June 2026 15:16:27
To: [REDACTED]
Subject: RE: CBAM

No problem at all thanks [REDACTED] yes let me know if anything further comes up.

Also something else that you may be interested in- DESNZ colleagues have advised us of the publication of the response to a UK Government consultation on "A policy framework to grow the market for low carbon industrial products".

<https://assets.publishing.service.gov.uk/media/6a18151a916cd732dcdaac4a/low-carbon-products-government-response.pdf>

The consultation, which ran from 29 June 2025 to 23 September 2025, sought views on a set of technical policy options that (when developed and implemented together) will form a cohesive framework of low carbon product market policies, that stimulate demand for, and investment in, low-carbon materials with an initial focus on steel, cement, and concrete products used in construction.

In discussion with DESNZ yesterday they advised that they are seeking to engage with key industry stakeholders at they progress this work, and I was wondering if this is something that you/MPANI would like more information on?

If so would you be content for me to pass your email address on to DESNZ colleagues directly?

Many thanks

[REDACTED]

From: [REDACTED]

Sent: 16 June 2026 12:39

To: [REDACTED]

Subject: CBAM

[REDACTED]

Sincere apologies but I've just realised I forgot to thank you for this very informative email.

We have a meeting this afternoon of our concrete development group who have a significant interest in this because of CBAM implications for Cement.

If there are any further questions I will come back to you

[REDACTED]

Sent from Outlook for iOS

Thursday 24th July 2025

Department of Agriculture, Environment and Rural Affairs
Clare House
303 Airport Road West
Belfast BT3 9ED

Mineral Products Association
(Northern Ireland) Ltd,
Nutts Corner Training Centre,
17 Dundrod Road, Crumlin
Co Antrim,
BT29 4SR

Sent via email to - Nutrientsactionprogramme@daera-ni.gov.uk

Re - **DAERA: NUTRIENTS ACTION PLAN**

Consultation Response

July 2025

The Mineral Products Association NI (MPANI) represents approximately 95% of companies involved in the supply of mineral products to the Construction and Agricultural Industries in Northern Ireland. Our Association draws its membership from companies engaged in providing primary aggregates, the processing of recycled and secondary materials, the production of downstream products such as asphalt, agricultural lime, mortar, ready-mixed concrete, precast concrete and road surfacing contracting. The Mineral Products Sector now employs over 3500 people across Northern Ireland and has a turnover of some £750 million.

QUESTION:

Do you agree that a mandatory liming programme should be introduced for grassland farms?

RESPONSE:

The MPANI supports the Agricultural Lime Association (ALA) position and recommendations on measures to improve soil health and productivity, introducing mandatory liming practices across all farms. However, before any such policy is implemented, we would support actions that must be taken into account to ensure that it is both effective and sustainable.

1. Minimum pH Level

The recommended target pH for grassland soils is **above 6.2*** as this is the threshold at which essential nutrients such as nitrogen (N), phosphorus (P) and potassium (K) are most available to plants. Below this level, these nutrients begin to bind with other elements, reducing their availability and limiting plant uptake, introducing environmental concerns around greenhouse gas emissions and runoff pollution.

In the case of phosphorus, for example, availability can decrease by **up to 48%** when soil pH drops to **6.0**. To ensure efficient nutrient use and healthy plant development, we strongly

recommend that the minimum acceptable pH be set and **consistently maintained at 6.2 or higher**.

	pH 4.5	pH 5.0	pH 5.5	pH 6.0	pH 6.5
Nitrogen	30%	43%	77%	89%	100%
Phosphorus	23%	31%	48%	52%	100%
Potassium	33%	52%	77%	100%	100%

Figures presented at the AHDB Agronomy Conference 2023 by the Agricultural Lime Association. Adapted from Beegle, D. (n.d.). Soil Acidity and Liming Issues. Penn State Extension; University of Wisconsin–Madison Soil Science Extension. (n.d.). Soil Fertility Basics; O’ Kennedy, S. (2022). Soil pH and Nutrient Availability. GeoJournal, 6(2), pp.941–950.

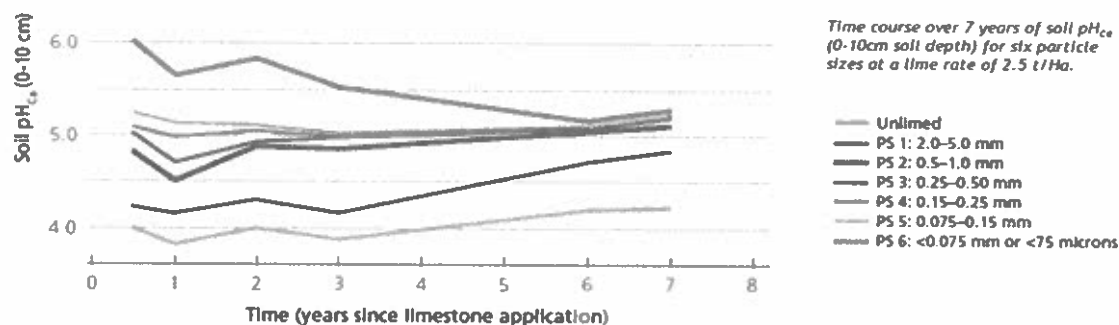
2. Reactivity and Neutralising Value

Not all lime is the same. The effectiveness of lime in raising soil pH depends very heavily on its **reactivity**, which is determined primarily by **fineness** and **chemical composition****. Simply put, the finer the lime, the more surface area it has, and the **faster and more efficiently** it reacts within the soil. This results in quicker pH correction and more immediate benefits for plant nutrient uptake.

Reactivity matters. A slow-acting lime may fail to deliver the timely response needed for efficient nutrient use, especially in systems that demand high grass production. Conversely, highly reactive lime can quickly adjust soil pH to optimal levels, supporting microbial activity, nutrient availability, and overall grassland productivity.

Lime quality is regulated under the **Fertiliser Regulations 1991**, which specify minimum standards for neutralising value and particle size. However, these regulations provide only a baseline. The Agricultural Lime Association administers the **AQS Standard (AQS)** — as a material verification scheme based on independent / UKAS accredited test certificates, which ensures consistent, reliable, and verifiable lime quality across the industry.

The AQS Standard provides farmers and advisors with confidence that the lime they are applying meets rigorous criteria for **neutralising value**, **fineness** and **reactivity**, leading to more predictable and effective pH management. We therefore recommend that any mandatory liming programme should be underpinned by stating clearly that farmers are required to provide a certificate of compliance from the supplier which demonstrates the lime applied meets at minimum the Fertiliser Regulations 1991 and where possible, promote or the AQS standard for both ground and granulated liming applications.



Graphic extracted from a study, published in *Crop and Pasture Science* by Conyers, Scott and Whitten (2020), specifically entitled: "The reaction rate and residual value of particle size fractions of limestone in southern New South Wales."

3. Frequency of Liming

While applying lime once every five years is certainly better than no application at all, this traditional practice is now widely recognised as **inefficient** in maintaining stable and optimum pH levels**.

For soils testing below **pH 5.7**, a corrective application of **1 to 3 tonnes of ground limestone** (depending on soil type) is essential. However, where liming is left for more than three to four years, soils commonly return to their **original** acidity, leading to prolonged periods of sub-optimal pH. This directly impacts nutrient availability, soil biology, and grass growth potential.

To avoid this, we strongly advocate for a "**little-and-often**" approach to liming. Annual applications using **granulated or ground lime** — or bi-annual applications on heavier soils — would allow farmers to both **achieve and sustain** the target pH level. This results in greater nutrient-use efficiency and improved year-on-year grassland performance.

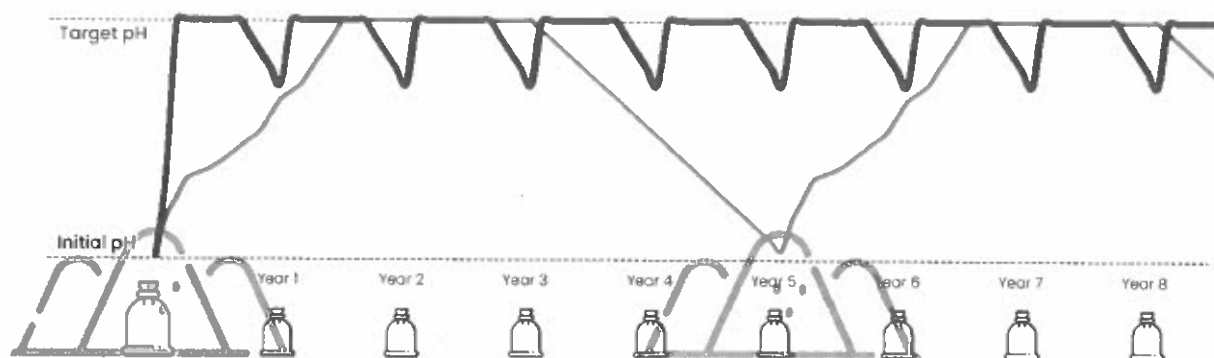


Chart presented at the Ulster Farmers Union headquarters (2022) and at the AHDB Cereals & Oilseeds Conference (2023) by the Agricultural Lime Association. It shows the potential benefit of a little-and-often approach (maintaining pH on an annual basis) versus 5-yearly application of a conventional ground lime. A coarser lime applied at an initially high-rate, and reduced to a lower application in subsequent years, would also deliver a similar result.

4. Calcium Considerations

Soil health depends heavily on calcium levels. When calcium is balanced properly with other key nutrients like magnesium, potassium, and sodium, it helps build good soil structure and supports healthy biological activity — both of which are vital for productive grassland. Calcium encourages flocculation, which opens up the soil, allowing air and water to move freely and giving soil organisms the conditions they need to thrive.

Excess magnesium, on the other hand, can impair soil function. If magnesium limestone is applied to soils that already have high magnesium (as is the case in most of Northern Ireland), it can make them heavy, sticky, and difficult to work with. As such, regular testing for all key cations is essential to guide informed decisions regarding the source and type of limestone applied — which helps avoid these issues and keeps the soil functioning well.

Currently, calcium testing is often overlooked despite its critical role in soil and plant health. We would recommend that any mandatory liming programme includes calcium testing as part of a broader soil health check. This will help ensure the lime is used effectively, improving soil structure, restoring aerobic conditions, reducing phosphorus losses, and supporting both nutrient efficiency and environmental sustainability.

CONCLUSION:

In summary, the MPANI supports a mandatory liming programme in the 2026–2029 NAP to boost soil health and nutrient efficiency, reducing GHG emission and phosphorus runoff. We advocate for a minimum soil pH of 6.2, a “little-and-often” liming approach, and AQS-compliant lime, with availability of accessible liming plans, incorporating **ground and granulated** lime, to ease both costs and concerns for farmers.

We would strongly recommend that the Agricultural Lime Association (ALA) must be recognised as a **key stakeholder** in shaping this programme and future policies, leveraging their expertise to ensure practical, data-based solutions that balance environmental and agricultural needs, and as such we urge DAERA to engage with them in **ongoing consultations** for a sustainable outcome.

REFERENCES:

* Agriculture and Horticulture Development Board (AHDB) “Soil pH and liming recommendations for arable and grass systems” <https://ahdb.org.uk/knowledge-library/soil-ph-and-liming-recommendations-for-arable-and-grass-systems>

** Li, Y., Cui, S., Chang, S.X., Zhang, Q. and Kennedy, S.O., 2018. Liming effects on soil pH and crop yield depend on lime material type, application method and rate, and crop species: a global meta-analysis. *Journal of Soils and Sediments*, 18(6), pp.2120–2131. Available at: <https://link.springer.com/article/10.1007/s11368-018-2120-2>

Yours sincerely



DAERA Marine and Fisheries Bill Team

From: DAERA Marine and Fisheries Bill Team
Sent: 28 July 2025 15:15
Subject: Water Quality Policy Stakeholder Event

DAERA is currently consulting on policies to inform the development of a Fisheries and Water Environment Bill. Good water quality and habitat are essential for healthy fish stocks and wider ecosystems. The key pressures acting upon our water environment are related to nutrients and organic pollutants and are attributed to both agricultural land use activities, sewage related impacts, and a range of other sources.

The Department wishes to deter polluters and non-compliant operators, protecting and restoring our water environment. Within the Lough Neagh Report there are key actions to explore and consult on enforcement methods, including the introduction of fixed penalty notices for non-compliance, and penalties and fines for the water pollution offences in current legislation. The policy suite which is currently being consulted upon focusses on the fisheries and aquaculture policies to inform the drafting of a Fisheries and Water Environment Bill, with a further policy consultation on the water quality policy later this year.

To inform this policy development, I would like to invite you to a closed stakeholder event focussed on water quality. The event will be held over two sessions – the first on 19th August (2-4.30pm) with a review session on 29th August (10am-12.30). Both events will be held in the recreation centre at Loughry College and will follow a structured format, inviting round table discussion on the topic.

I would be grateful if you could please indicate if you are available to attend both sessions, and if not, please nominate a suitable deputy.
Please also note if you have any dietary restrictions or accessibility requirements.

I would be grateful for confirmation of your attendance or otherwise by Thursday 7th August, by return email.

Many thanks

Head of the Fisheries and Water Environment Bill team



Department of
Agriculture, Environment
and Rural Affairs
an tSeirbhís Áraimhe, Timpeallacht agus Rura

An tSeirbhís
Talmhaíochta, Comhshaoil
agus Gnóthai Tuaithe

Department of
Fairmin, Environment
an' Kintra Matthers

*Sustainability at the heart of a
living, working, active landscape
valued by everyone*

DAERA Marine and Fisheries Bill Team

Subject: FW: Water Quality Policy Stakeholder Event
Location: The Recreational Centre, Loughry College

Start: Tue 19/08/2025 14:00
End: Tue 19/08/2025 16:30
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: DAERA Marine and Fisheries Bill Team

-----Original Appointment-----

From: DAERA Marine and Fisheries Bill Team

Sent: 11 August 2025 14:13

To: DAERA Marine and Fisheries Bill Team;

Cc: Gordon Best

Subject: Water Quality Policy Stakeholder Event

When: 19 August 2025 14:00-16:30 (UTC+00:00) Dublin, Edinburgh, Lisbon, London.

Where: The Recreational Centre, Loughry College

Afternoon

There will be light refreshments available from 1.30pm.

Thank you



Department of
Agriculture, Environment
and Rural Affairs
an tseachtán ag an tAontas

An Roinn
Talmhaíochta, Comhshaoil
agus Gnothaí Tuaithe

Department of
Fairmin, Environment
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*Sustainability at the heart of a
living, working, active landscape
valued by everyone*

DAERA Marine and Fisheries Bill Team

From: DAERA Marine and Fisheries Bill Team

Sent: 20 August 2025 15:40

Subject: Stakeholder Engagement Event - Water Quality 19 August 2025

Afternoon

Thank you for attending the stakeholder engagement event yesterday and for your valuable contributions. As discussed, please find the attached documents for your reference.

If you have any questions or require further information, please don't hesitate to get in touch.

Best regards,



Criminal Sanctions

Fixed Penalty Notice

A Fixed Penalty Notice (FPN) is a financial penalty, which is an alternative to prosecution, and if unpaid, can be dealt with by way of prosecution in the criminal courts. Non-payment is an offence.

There is a court alternative to accepting the notice. If you accept the fine, you will avoid a court summons, but if you don't accept it, you will have to appear in court.

A FPN is limited to minor offences and where one has been served, payment of the penalty discharges the liability. Where this happens, a record of the payment of the FPN will be kept and treated in the same way as a record arising from a warning.

FPNs tend to be limited between £100 and £400.

Legislative solution

This legislative solution creates a criminal offence to penalise a particular activity or a failure to do something. The solution involves making a particular act, omission or course of conduct punishable in a criminal court.

The policy driver may be:

- to discourage certain actions or behaviour by making the actions or behaviour punishable as a criminal offence;
- to encourage certain behaviour so that failure to do something is punishable as a criminal offence;
- to "give teeth" to a separate statutory requirement, so that a failure to comply with the requirement becomes a criminal offence;
- to enforce an international obligation.

Civil Sanctions

Civil sanctions are an alternative to criminal prosecution and a way of making environmental law enforcement more flexible and effective for both regulators and businesses.

Where an offence has been committed and the delivery of advice and guidance doesn't achieve the required outcome, then the regulator will consider issuing some form of sanction as well as taking any other preventive or remedial action necessary to protect both people and the environment.

Fixed Monetary Penalty

A Fixed Monetary Penalty (FMP) is a financial penalty for non-compliance and is normally appropriate for relatively minor offences which cause no direct harm, which have few lasting effects or impact on communities and where little (if any) financial benefit arises from the offence.

Variable Monetary Penalty

A Variable Monetary Penalty (VMP) is a financial penalty used for more serious cases of non-compliance where the regulator decides that prosecution is not in the public interest. The fine amount will vary depending on aggravating and mitigating circumstances

The basic formula is:

financial benefit from non-compliance + deterrent component – other costs incurred.

A VMP is issued for more serious offences including;

- when there is evidence of negligence or mismanagement;
- when there is an environmental impact;
- the removal of an identifiable financial gain or saving as a result of the

breach; and

- where it is not in the public interest to prosecute.

Legislative solution

This legislative solution creates a civil sanctions regime, for civil sanctions to be imposed by a person other than a court: frequently a public body operating as a regulator of a particular sector, or (for example) Ministers, government departments or local authorities. The aim of a civil sanction is to control behaviour in some way, but without criminalising it. The kind of civil sanctions that may be wanted, and their relationship (if any) with criminal offences, will of course depend on the context and purpose of the policy. It might, for example, be:

- to try to ensure compliance with a regulatory regime;
- to stop ongoing conduct that is causing harm or damage;
- to penalise behaviour of a certain kind

Note

A person on whom a civil monetary penalty is imposed has a right of appeal against it, and that is a key feature that distinguishes such penalties from the fixed penalty notices, where the alternative to paying the FPN is prosecution and “having your day in court”.

The main benefit of civil sanctions is speed and flexibility. Offences that are committed deliberately, recklessly or with gross negligence are more likely to result in prosecution. Where an offence was committed because of an accident or a genuine mistake it is more likely to result in the use of advice, guidance, warning or an available civil sanction. This gives regulators the option of imposing a different form of sanction (beyond a warning or caution) without the need to first go through the courts.



Summary of the Fisheries and Water Environment Bill

The following is an analysis of the Fisheries and Water Environment Bill which sets out the four main themes that underpin the policy proposals. These themes are not only present across multiple sections but also serve as the foundation for the Department's strategic direction in managing inland fisheries, aquaculture, and sea fisheries.

1. Regulation and Governance

Definition: Establishing clear legal and administrative frameworks to manage fisheries and aquaculture activities.

Evidence from the Document:

- The Fisheries and Water Environment Bill is central to modernising the legislative framework.
- Introduction of licensing and permitting systems for recreational, commercial, and sea fishing.
- Proposals for Fixed Penalty Notices (FPNs) and civil sanctions to improve enforcement flexibility.
- Alignment of aquaculture licensing with Marine Licensing to ensure consistency and legal clarity.

Explanation: This theme reflects a strong commitment to building a robust, enforceable, and adaptable regulatory system. The Department seeks to ensure that all activities are legally accountable and that enforcement mechanisms are proportionate and effective.

2. Efficiency and Modernisation

Definition: Streamlining processes, reducing administrative burdens, and improving operational effectiveness.

Evidence from the Document:

- Proposal to simplify aquaculture licensing by integrating it with existing regulatory consents.
- Use of data collection (e.g. recreational activity, catch reporting) to support evidence-based decision-making.
- Introduction of flexible enforcement tools (e.g. FPNs) to reduce reliance on court proceedings.
- Emphasis on transparent and accessible systems for stakeholders.

Explanation: Efficiency is a cross-cutting goal, aimed at making fisheries and aquaculture management more responsive, less bureaucratic, and better aligned with modern environmental governance practices.

3. Conservation and Ecosystem Protection

Definition: Safeguarding aquatic biodiversity, habitats, and fish stocks through protective measures.

Evidence from the Document:

- Adoption of the ecosystem, precautionary, and bycatch objectives from the UK Fisheries Act 2020.
- Powers to introduce and amend conservation regulations for recreational and commercial fishing.
- Enforcement of greater penalties for ecosystem degradation.
- Management of fishing rights to avoid negative impacts on fish stocks.

Explanation: Conservation is a foundational principle, ensuring that fisheries and aquaculture activities do not compromise the ecological integrity of inland and marine environments. The policies aim to balance use with protection.

4. Sustainability and Long-Term Stewardship

Definition: Ensuring that fisheries and aquaculture are managed in a way that meets present needs without compromising future generations.

Evidence from the Document:

- Inclusion of the sustainability, climate change, and scientific evidence objectives.
- Support for sustainable development and innovation in aquaculture.
- Management of commercial fisheries to ensure long-term viability of fish stocks.

- Public Angling Estate (PAE) designed to be sustainable, accessible, and affordable.

The themes outlined in the Fisheries and Water Environment Bill consultation—Regulation and Governance, Efficiency and Modernisation, Conservation and Ecosystem Protection, and Sustainability and Long-Term Stewardship—are all intrinsically linked to the protection and enhancement of water quality.

A robust regulatory framework ensures that fisheries and aquaculture activities are subject to clear environmental standards, including controls on discharges and pollutants. Streamlined, data-driven processes enable more effective monitoring and quicker responses to emerging water quality issues.

Conservation measures help safeguard aquatic habitats that are sensitive to changes in water chemistry, while sustainability objectives promote practices that maintain the ecological integrity of water bodies over the long term.

Together, these themes support a holistic approach to managing aquatic environments, recognising that healthy fish populations and productive fisheries depend on clean, well-functioning water ecosystems.



Questions

Question 1

- **Context** - The key drivers behind the need for change in the water environment and regulations include, the PfG, Lough Neagh report, the NIAO reports and OEP recommendations. Water quality affects individuals and organisations as a whole and the Department want to ensure there is an equitable approach adopted to enforcement relating to pollution offences which will incorporate any polluter and any pollutant.
- **What are your views on how the Department could achieve this equitable approach?**

Question 2

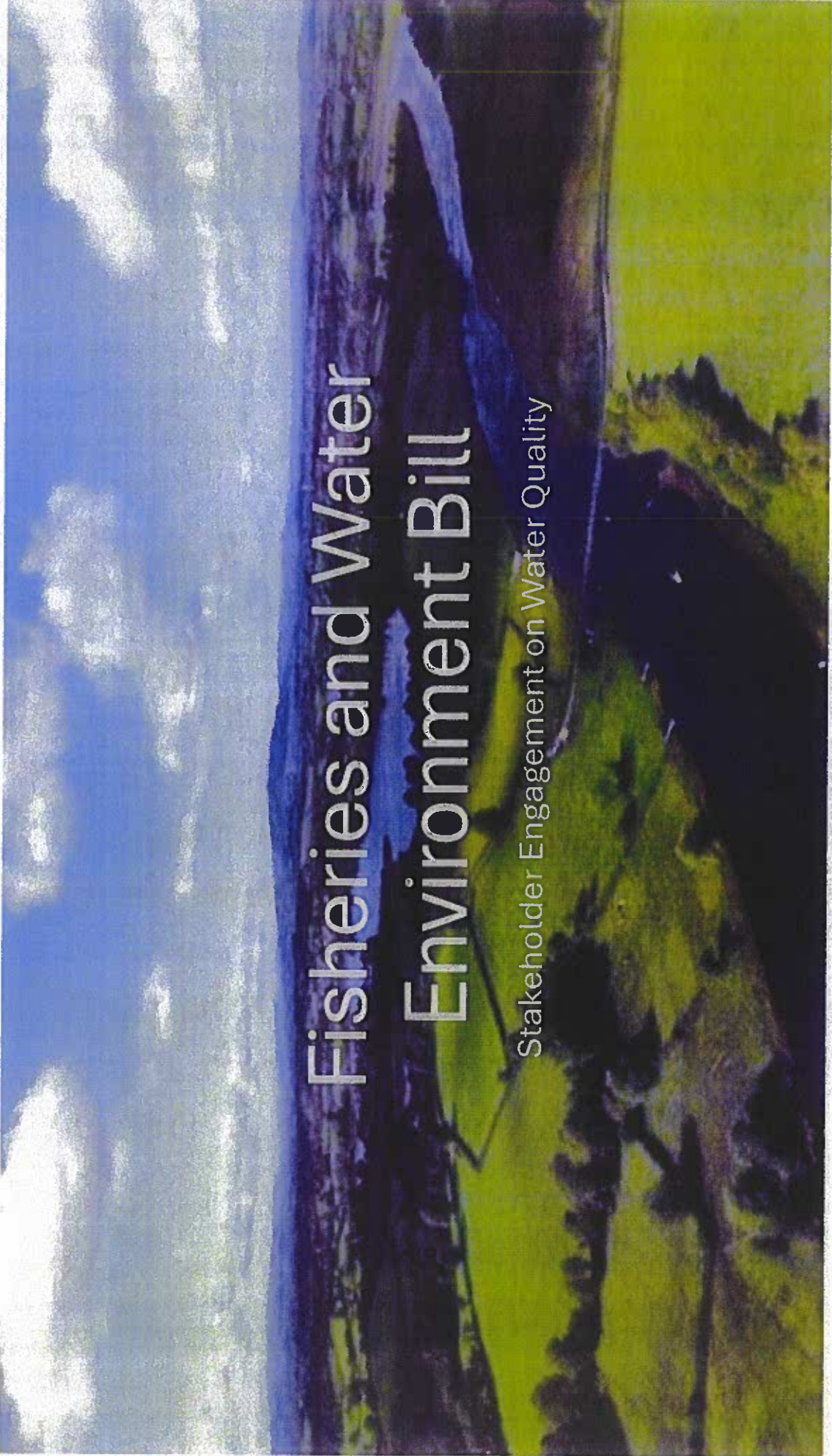
- **Context** - One of the key priorities set out in the current Programme for Government is protecting Lough Neagh and the environment. The Lough Neagh Action Plan establishes a number of key actions which will work towards achieving this. Action 30 discusses exploring enforcement methods including fixed penalty notices and civil sanctions for non-compliance, to act as a deterrent for polluters and non-compliant operators.
- **What kind of sanctions might be the most effective deterrent for minor breaches of legislation?**

Question 3

- **Context** - The maximum fine in Northern Ireland for an offence prosecuted under the Water (NI) Order 1999 is £20k, however, similar offences across the UK and Ireland have much higher penalties. In addition, fisheries and aquaculture proposals (out for consultation at present) aim to raise the bar in terms of the importance of the ecosystem and penalties for ecosystem degradation offences.

The proposal is that many fisheries related offences will have the maximum penalty increased to £50,000.

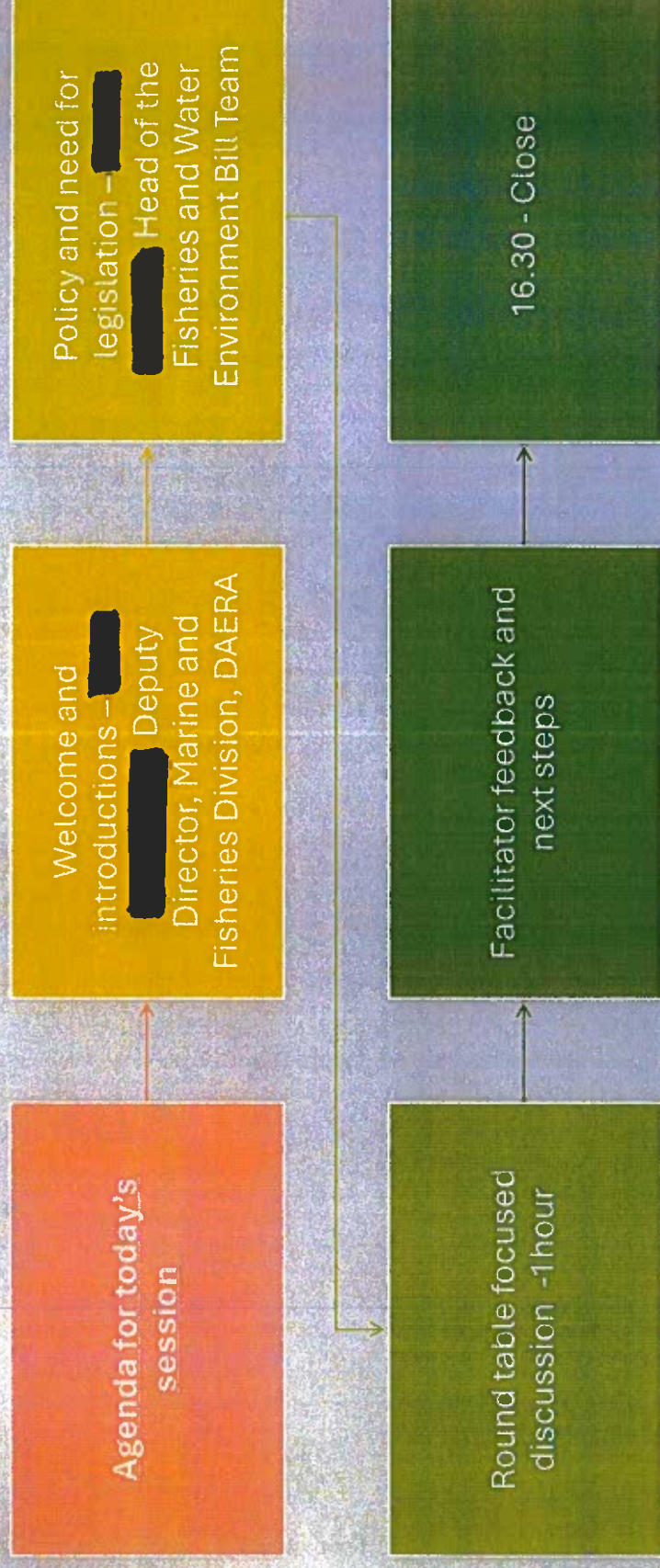
- **What are your views on increasing the maximum fine available in Northern Ireland for offences on summary conviction prosecuted under the Water (NI) Order 1999,**
- **and how might this impact compliance, deterrence, and industry practices?**

The background of the slide is a scenic landscape. It features a wide river or lake in the foreground, reflecting the sky. The middle ground is filled with rolling green hills and some trees. In the distance, there are more hills and a small town or village. The sky is a deep blue with scattered white clouds. The overall tone is peaceful and natural.

Fisheries and Water Environment Bill

Stakeholder Engagement on Water Quality

Fisheries and Water Environment Bill



Fisheries and Water Environment Bill

Policy intent:

Sustainable management of our fisheries and aquaculture

A vibrant, profitable, and sustainable fishing and aquaculture sector supported by a healthy environment that is resilient to climate change

Outworking of this:

Environmental, economic and social considerations are appropriately balanced when managing our fisheries to benefit present and future generations.



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Themes

The themes outlined in the Fisheries and Water Environment Bill consultation are:

- Regulation and Governance,
- Efficiency and Modernisation,
- Conservation and Ecosystem Protection, and
- Sustainability and Long-Term Stewardship

All are all intrinsically linked to the protection and enhancement of water quality.

- Northern Ireland's (NI) water resources are an important natural asset, contributing to economic, social and environmental wellbeing.
- Good water quality and habitat are essential for fish stocks, especially salmon and trout.



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Programme for Government

'Protecting Lough Neagh and the Environment' is a Programme for Government priority.

Our Plan: Doing what matters most notes that 'a collective, cohesive and integrated approach will be key for a meaningful and sustained improvement in our water quality, which will require changes in our behaviours and practices

The Department has committed to deliver the actions in the Lough Neagh Report and Action Plan, including an action to explore and consult on enforcement methods (fines and penalties for environmental crime).



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Office of Environmental Protection

Office of Environmental Protection review of implementation of laws for terrestrial and freshwater protected sites in Northern Ireland April 2025

- Civil sanctions are unavailable – this is a ‘gap in the regulatory toolkit’ – resulting in lengthy and costly criminal prosecutions.
- Macrory report promoted the use of intermediate penalties.
- NIEA has relatively few tools at its disposal to take action against unlawful activity



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Office for Environmental Protection recommendation on Public Consultation on the Nutrient Action Programme 2026- 2029 June 2025

- DAERA must comply with its obligations under environmental law, notably the Habitats Regulations and the Water Framework Directive (WFD) Regulations.
- It is important to address nutrient pollution not only from the agri-food industry but also from wastewater. Together, they are a leading cause of the decline in biodiversity in Northern Ireland. Urgent need for government to take action in parallel on wastewater pollution.
- The consequences of failing to address nutrient pollution in the round are grave. They extend not just to the state of Northern Ireland's loughs and rivers, but also to drinking water supplies and to prospects for future agricultural, residential and commercial developments.
- DAERA's draft third cycle River Basin Management Plan under the WFD Regulations identified nutrient pressures as 'the biggest reason why water bodies have not achieved good status'



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Northern Ireland Audit Office Report

Water Quality in Northern Ireland's Rivers and Lakes

March 2024

- Climate change is likely to increase the pressures on NI's water bodies; those with low levels of pollutants are likely to be more resilient in the face of such change
- Both river and lake (surface) water bodies have been falling short of the ecological status target.
- When excess quantities of substances such as phosphorus and nitrate, are allowed to accumulate in rivers and lakes, the combination of reduced oxygen levels and increased algae growth is detrimental to the long-term health of the water environment
- In 2021, no rivers or lakes achieved 'Good' or 'High' overall water body status in Northern Ireland
- Reporting carried out against the Nitrates Directive shows that the number of rivers assessed as 'Poor' (already nutrient enriched) due to the presence of excessive levels of phosphorus increased by almost 40 per cent between the reporting periods 2012-2015 and 2019
- Making further improvements will require the Department to better utilise the opportunities available for all forms of partnership working



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Northern Ireland Audit Office Report Waste Crime in Northern Ireland

July 2025

- Northern Ireland produces approximately 7.7 million tonnes of waste each year. Waste comes in a range of forms, including: household, commercial and industrial waste; construction, demolition and excavation waste; hazardous waste; agricultural waste; and wastewater
- Waste that is not managed legitimately can pollute the land, the waters and the air that we breathe, potentially harming both human health and the environment. For example, rainwater can mix with the waste to form a toxic leachate (run off from a waste site), which can enter water courses, causing damage to habitats and contaminating sources of drinking water
- The penalties for waste crime are low in comparison to the costs of disposing of the waste legally.
- Perpetrators of illegal activity must face a punishment that dissuades them from committing the crime in the first place, or from re-offending.
- Evidence to the Mills Review identified that the penalties were lower in NI than the rest of the UK.



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Points for discussion

- How do we ensure we have a more flexible enforcement regime, with a more effective 'regulatory toolkit'?
- How can DAERA improve partnership working to improve water quality?
- How can DAERA ensure that it complies with its obligations under environmental law?
- How can we ensure a fair regime to address water pollution from any source - agri-food, industry and wastewater



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DAERA Marine and Fisheries Bill Team

From: DAERA Marine and Fisheries Bill Team

Sent: 27 August 2025 11:45

To: DAERA Marine and Fisheries Bill Team <MarineandFisheriesBillTeam@daera-ni.gov.uk>

Subject: stakeholder engagement session - Friday 29th August (from 9.30am for 10am start)

Hi everyone,

In preparation for Friday's meeting at Loughry (same room as before), please see attached agenda, summary of the key themes from the previous session and a short paper outlining some policy options for discussion.

Please do not circulate this material outside of this group at this time.

I will look forward to seeing you on Friday – scones are available from 9.30am with the session starting then at 10am,

This closed session follows on from last week's session (19th) – if you have not yet confirmed attendance and find that you are now able to attend, please let me know before lunchtime tomorrow,

Many thanks,

Alison

Head of the Fisheries and Water Environment Bill team



Department of
Agriculture, Environment
and Rural Affairs

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AGENDA for 29th AUGUST

- 09.30 – Scones and tea/coffee available on arrival
- 10.00 – Welcome and introductions, summary of previous event and feedback – [REDACTED]
- 10.15 – Fisheries and Water Environment Bill – what can be written into a policy position - what can be incorporated into the Bill – [REDACTED]
- 10.30 – Round table discussions on policy options (sent by email in advance)
- 11.15 – Round table discussion on 4 pillars and their fit with RBMP
- 12.00 – Facilitator feedback and questions
- 12.30 – Meeting close (sandwiches available).



Protection of the Water Environment

Stakeholder Engagement session 2 - 29th August

Policy Options

A. Extend the remit of the 4 key pillars identified in the Lough Neagh Action Plan through the fourth cycle River Basin Management Plan (RBMP)

- **Education** - to empower knowledge and skills essential to underpin effective decision making.
- **Investment** - with incentivisation and innovation that drives the adoption of sustainable practices and promotes the importance of behavioural change/science.
- **Regulation** - to ensure that we have a robust legislative framework in place that ensures the protection of our environment, and
- **Enforcement** - a readiness and a determination to take strong, meaningful action when compliance with the regulation fails in a fair, balanced and proportionate manner.

Prevention through the pillars of education, investment and regulation is critical.

Proposed approach

1. In the fourth cycle River Basin Management Plan, DAERA could extend the principles of Education, Investment, Regulation and Enforcement as a framework within which the planning would progress.
2. We could require the publication of an overarching Protection of the Water Environment Policy Statement to show how the overarching framework would be integrated within River Basin Management Planning and how this would be taken forward in a programme of measures.

Q - What are your views on extending the 4 pillars from the Lough Neagh Action Plan to the River Basin Management Planning process?

B. Consistency of approach – any polluter...any pollutant

Creating consistency of approach to water pollution offences is a policy aim of the Fisheries and Water Environment Bill. Under the Water (Northern Ireland) Order 1999 it is an offence '*knowingly or otherwise to discharge or deposit any poisonous, noxious or polluting matter so that it enters a waterway or water contained in any underground strata*', carrying a maximum penalty of £20k.

Maximum penalties for pollution under the Waste and Contaminated Land (Northern Ireland) Order 1997 are £5k or £50k in the case of controlled waste. It is proposed that all offences relating to water pollution are raised consistently to £50k which is equivalent to penalties within fisheries legislation, marine licensing etc.

A consistent approach is a key principle of the DAERA enforcement policy¹, the objective of which is to prevent or reduce harm caused by non-compliance with statutory requirements.

Proposed changes

1. A standard approach could apply to industrial effluent, agricultural waste, controlled waste and wastewater in the Waste and Contaminated Land (Northern Ireland) Order 1997.
2. All offences resulting in pollution of the water environment (in both the Waste and Contaminated Land (Northern Ireland) Order 1997 and the Water (Northern Ireland) Order 1999) could carry the same maximum penalty, with the opportunity for unlimited fines as a possibility for certain crown court offences.

¹ [DAERA Enforcement Policy - 2023](#)

C. Provide additional enforcement tools

The Bill could offer the opportunity to get a primary power to make regulations at a later stage to introduce Fixed Penalty Notices and Fixed and Variable Monetary Fines as additional enforcement mechanisms in relevant legislation, with further consultation on each piece of secondary legislation as it is developed.

Similar approaches have proven to be an effective enforcement mechanism for minor to moderate breaches of regulations and would ensure that prompt action could be taken to deter behaviours which impact on water quality. **In cases where there are significant breaches of legislation, the Department would pursue the case through the enforcement process that may lead to a prosecution.**

Administrative penalties (such as FPNs and Fixed and Variable Monetary penalties) require the same level of evidence to be gathered and would not be administered on the spot. They would be subject to the same scrutiny by enforcement panels as prosecutions.

Suggested action:

1. Enhanced enforcement tools such as Fixed Penalty Notices and Fixed and Variable Monetary Fines could ensure that minor and moderate breaches are dealt with more swiftly, providing immediate deterrence to polluters and non-compliant operators.

Policy intent - The Department wishes to deter polluters and non-compliant operators, supporting the Departmental priority of protecting and restoring our water environment and delivering improvements to water quality.

Q – Do you think there is anything else from a legislative perspective that needs to be included in the Bill?

Questions for table top discussion – protection of the water environment

Session 1- 19th August 2025

Question 1

- **Context** - The key drivers behind the need for change in the water environment and regulations include, the PfG, Lough Neagh report, the NIAO reports and OEP recommendations. Water quality affects individuals and organisations as a whole and the Department want to ensure there is an equitable approach adopted to enforcement relating to pollution offences which will incorporate any polluter and any pollutant.
- **What are your views on how the Department could achieve this equitable approach?**

Key Themes

1. Shared Responsibility Across Sectors

- Strong consensus that **all sectors must contribute** to improving water quality.
- Recognition that **everyone has a role to play**, from individuals to large corporations.

2. Definition and Application of Equity

- Debate around what “equitable” means:
 - Should penalties be **uniform** or **variable** based on factors like intent, ability to pay, or environmental harm?
 - Need for **proportionality** and **fairness** in enforcement.

3. Sanctions and Penalties

- Concern that **current fines are too low and not consistently applied**.
- Calls for:
 - **Sentencing guidelines** to be reviewed and strengthened.
 - **Fines** should reflect intent of offender and level of environmental harm.
 - **Judicial education** on environmental harm.
 - **Fair fines across all sectors**, avoiding double penalties (e.g., farmers losing grants and being fined).
 - **Fines to be used to fund environmental restoration**.

- **Environmental liability** regulations to be used to recover costs for remediating environmental damage.

4. Education and Incentivisation

- There is action that can be taken to prevent environmental harm:
 - **Education** on compliance and pollution prevention.
 - **Incentives** for good practices.
 - **Financial assistance** schemes should be long-term and incentivise catchment scale collaboration.
 - **Early education** initiatives like eco-schools with a water theme.

5. Communication and Engagement

- Need for **better dialogue** between regulators and industries.
- Tailored messaging to different communities (e.g., urban vs rural) to make water quality personally relevant.

6. Mental Health and Social Impact

- Recognition of **unintended consequences** of enforcement, especially in rural areas where individuals may be publicly identified.
- Importance of **sensitive handling** to avoid stigma and mental health issues.
- Special consideration for **young people**.

7. Cross-Government and Multi-Industry Collaboration

- Call for a **joined-up approach** involving multiple departments and industries to tackle water pollution holistically.

Main Takeaways

- **Equity in enforcement** must balance fairness, proportionality, and sector-specific realities.
- **Education, incentives, and communication** are as vital as penalties in driving behaviour change.
- **Judicial reform and consistent application of fines** are needed to make enforcement effective.
- **Collaboration and tailored engagement** will help build public and sectoral support.
- **Sensitivity to social impacts**, especially in rural communities, is crucial for maintaining trust and fairness.

Summary of the consultee responses:

1. All sectors must contribute to improving water quality—shared responsibility is essential.
2. Equity in enforcement should consider intent, ability to pay, and environmental harm.
3. Current fines are too low and inconsistently applied; sentencing guidelines need review.
4. Education and incentives are key alongside penalties to encourage positive behaviour.
5. Better communication between regulators and industries is needed.
6. Enforcement must be sensitive to social impacts, especially in rural communities.
7. Farmers face double penalties—this needs to be addressed for fairness.
8. Tailored messaging can help engage different communities more effectively.
9. Early education (e.g. eco-schools) can foster long-term environmental responsibility.
10. A cross-government, multi-industry approach is vital for meaningful change.



IMPROVING WATER QUALITY



All sectors must contribute to improving water quality—shared responsibility is essential



Equity in enforcement should consider intent, ability to pay, and environmental harm



Current fines are too low and inconsistently applied; sentencing guidelines need review



Education and incentives are key alongside penalties to encourage positive behaviour



Better communication between regulators and industries is needed



Enforcement must be sensitive to social impacts, especially in rural communities



Farmers face double penalties—this needs to be addressed for fairness



Tailored messaging can help engage different communities more effectively

Question 2

- **Context** - One of the key priorities set out in the current Programme for Government is protecting Lough Neagh and the environment. The Lough Neagh Action Plan establishes a number of key actions which will work towards achieving this. Action 30 discusses exploring enforcement methods including fixed penalty notices and civil sanctions for non-compliance, to act as a deterrent for polluters and non-compliant operators.
- **What kind of sanctions might be the most effective deterrent for minor breaches of legislation?**

Key Themes

1. Proportional and Impact-Based Sanctions

- Sanctions should reflect the environmental harm caused, not just procedural failures.
- Proportionality and fairness are essential—major incidents should still go to court.

2. Flexible Enforcement Options

- Strong support for Fixed Penalty Notices (FPNs) and civil sanctions for minor/moderate breaches.
- These are seen as faster, less resource-intensive, and more practical than criminal prosecution.

3. Clear Guidance and Offence Categorisation

- Need for clear criteria on which offences warrant which sanctions.
- A traffic light system (warnings, then escalating penalties) was suggested.

4. Education First, Enforcement Last

- Emphasis on education, guidance, and support before enforcement.
- Most pollution is unintentional, so advisory support is key for first-time or accidental breaches.

5. Reparative and Restorative Approaches

- Support for reparative sanctions—e.g. fines funding habitat restoration.
- Interest in nature-based solutions and enforcement undertakings like those used in England.

6. Reputational and Non-Financial Deterrents

- Reputational damage can be more effective than fines.
- FPNs are seen as a non-criminal but visible deterrent.

7. Consistency and Cross-Border Alignment

- Enforcement should align with Republic of Ireland to avoid transboundary issues.
- Involvement of DfI and DfE is necessary due to cross-sector impacts on water quality.

Main Takeaways

- A tiered, proportionate enforcement system is preferred, with FPNs and civil sanctions for minor breaches.
- Education and support should be the first step, with enforcement as a last resort.
- Restorative justice and reputational consequences are valuable deterrents.
- Clarity, fairness, and consistency in enforcement are essential to build trust and ensure compliance.

Summary of the consultee responses on effective sanctions for minor environmental breaches:

1. Sanctions should reflect **actual environmental harm**, not just procedural failures.
2. **Fixed Penalty Notices (FPNs)** and **civil sanctions** are preferred for minor breaches.
3. These options offer **faster resolution** and reduce pressure on the legal system.
4. A **tiered approach** (education, then enforcement) is widely supported.
5. **Clear guidance** is needed on which offences suit which penalties.
6. **Reparative measures** like habitat restoration are strongly favoured.
7. **Reputational risks** (e.g. naming and shaming) can be powerful deterrents.
8. Enforcement must be **fair, proportionate, and transparent**, avoiding double penalties.
9. **Cross-border consistency** with the Republic of Ireland is important.
10. **Education and advisory support** should be prioritised for first-time or accidental breaches.



EFFECTIVE SANCTIONS FOR MINOR ENVIRONMENTAL BREACHES



Sanctions should reflect environmental impact, not just procedural failures



Fixed Penalty Notices (FPNs) and civil sanctions are welcomed for minor breaches



These options could speed up enforcement and reduce court burdens



Clear guidance is needed on which offences suit which penalties



Education and advisory support should precede enforcement, especially for first-time or accidental breaches



Reparative approaches (e.g. habitat restoration) and nature-based solutions are strongly supported



Reputational risks can be a stronger deterrent than financial penalties—naming and shaming may be effective



A traffic light system (warnings, then penalties for repeat offences) was suggested



Cross-departmental coordination and alignment with Republic of Ireland enforcement is essential

Question 3

- **Context** - The maximum fine in Northern Ireland for an offence prosecuted under the Water (NI) Order 1999 is £20k, however, similar offences across the UK and Ireland have much higher penalties. In addition, fisheries and aquaculture proposals (out for consultation at present) aim to raise the bar in terms of the importance of the ecosystem and penalties for ecosystem degradation offences.
The proposal is that many fisheries related offences will have the maximum penalty increased to £50,000.
- **What are your views on increasing the maximum fine available in Northern Ireland for offences on summary conviction prosecuted under the Water (NI) Order 1999,**
- **and how might this impact compliance, deterrence, and industry practices?**

Key Themes

1. Support for Increased Penalties

- General agreement that current fines are too low and lack deterrent effect.
- Some support for unlimited fines for serious pollution offences.

2. Judicial Application and Sentencing

- Concern that maximum fines are rarely applied.
- Need for judicial education and updated sentencing guidelines to ensure effective use of increased penalties.

3. Fairness and Equity

- Emphasis on equitable treatment across sectors—agriculture, industry, wastewater, and the public.
- Enforcement must avoid disproportionate impacts, especially on rural communities.

4. Polluter Pays Principle

- Strong support for enforcing the polluter pays principle.
- Recognition that some sectors (e.g. wastewater) are perceived as being under-regulated.

5. Education and Prevention

- Enforcement should be a last resort—education and awareness are key to preventing pollution.
- Need for training and guidance on pollution prevention and reporting.

Main Takeaways

- Increasing the maximum fine is broadly supported but must be matched by effective judicial enforcement.
- A fair, proportionate, and transparent system is essential to maintain public and sectoral trust.
- Education and preventative measures should accompany any changes to enforcement policy.
- Sector-wide consistency and avoidance of rural bias are critical for equitable implementation.
- Strengthening the polluter pays principle will reinforce accountability and drive better industry practices

Summary of the consultee responses on increasing the maximum fine:

1. General support for increasing fines, as current levels lack deterrent effect.
2. Concern that **maximum penalties are rarely applied**—judicial education is needed.
3. Sentencing guidelines must be **reviewed and strengthened**.
4. Fines should be **fair and proportionate**, with consistent treatment across sectors.
5. **Polluter pays principle** should be enforced more robustly.
6. Enforcement must avoid **disproportionate impacts on rural communities**.
7. Some support for **unlimited fines** for serious pollution offences.
8. Education and prevention should come **before enforcement**.
9. **Low court fines** undermine the credibility of environmental protection efforts.
10. Clearer attribution of responsibility is needed, especially in urban areas.



INCREASING ENVIRONMENTAL FINES



General support for increasing fines, as current levels lack deterrent effect



Concern that maximum penalties are rarely applied—judicial education is needed



Sentencing guidelines must be reviewed and strengthened



Fines should be fair and proportionate, with consistent treatment across sectors



Polluter pays principle should be enforced more robustly



Enforcement must avoid disproportionate impacts on rural communities



Some support for unlimited fines for serious pollution offences



Low court fines undermine the credibility of environmental protection efforts



Clearer attribution of responsibility is needed, especially in urban areas

DAERA Marine and Fisheries Bill Team

From: DAERA Marine and Fisheries Bill Team

Sent: 02 September 2025 15:26

Subject: Stakeholder Engagement Event - Water Quality 29 August 2025

All,

Thank you for your attendance at the second stakeholder engagement event in relation to water quality on Friday at Loughry College.

Please see attached slides which were presented on the screen to aid discussion.

I have included below a summary of our discussion of the policy options and the fit of the 4 pillars with the River Basin Management plan.

Main Takeaways – discussions centred on:

1. **Sector-Specific Education and Support:**
 - Farmers and other sectors lack tailored guidance and consistent messaging.
 - Absence of farm advisors and misinformation hinder sustainable practices.
2. **Confidence and Collaboration:**
 - Agriculture sector fears misuse of shared information.
 - A shift from blame culture to partnership and trust-building is essential.
3. **Resource and Capacity Needs:**
 - Departments need more visibility and trained staff to support sectors.
 - Unequal access to environmental funding, especially for agriculture.

Key Themes arising from discussion on Policy Options provided

1. **Tailored Education and Guidance:**
 - Education must be industry-specific, not one-size-fits-all.
 - Sharing best practices and adapting successful models (e.g. STOP guidance for quarries).
2. **Building Trust and Breaking Silos:**
 - Better communication between departments and sectors.
 - Collaboration with trade bodies and third-party assessments to support education.
3. **Financial and Structural Barriers:**
 - Agriculture lacks access to environmental funding compared to other sectors.
 - Planning procedures and other systemic issues hinder compliance and investment.
4. **Legislative Flexibility and Future-Proofing:**
 - Legislation should allow discretion for unforeseen events.
 - Consideration of adding consideration of “restoration” to reflect remediation goals; discussion that restoration might be the overall objective of the 4 pillars, or indeed the output

Key Themes – Fit of the 4 Pillars of Lough Neagh Action Plan with River Basin Management Plan

1. **Restoration as a Priority:**
 - Restoration should begin immediately and include preventative measures.
 - Innovative approaches (e.g. phosphorus removal by Queen’s University) are underway.
2. **Alignment and Integration:**

- Strong alignment between the 4 pillars and River Basin Management Plan.
- Localized approaches have proven effective and should be expanded.

3. Education and Cross-Sector Understanding:

- Education fosters trust and awareness across sectors.
- Understanding interdependencies between sectors is crucial.

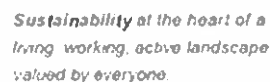
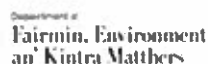
4. Encouraging Proactive Behaviour:

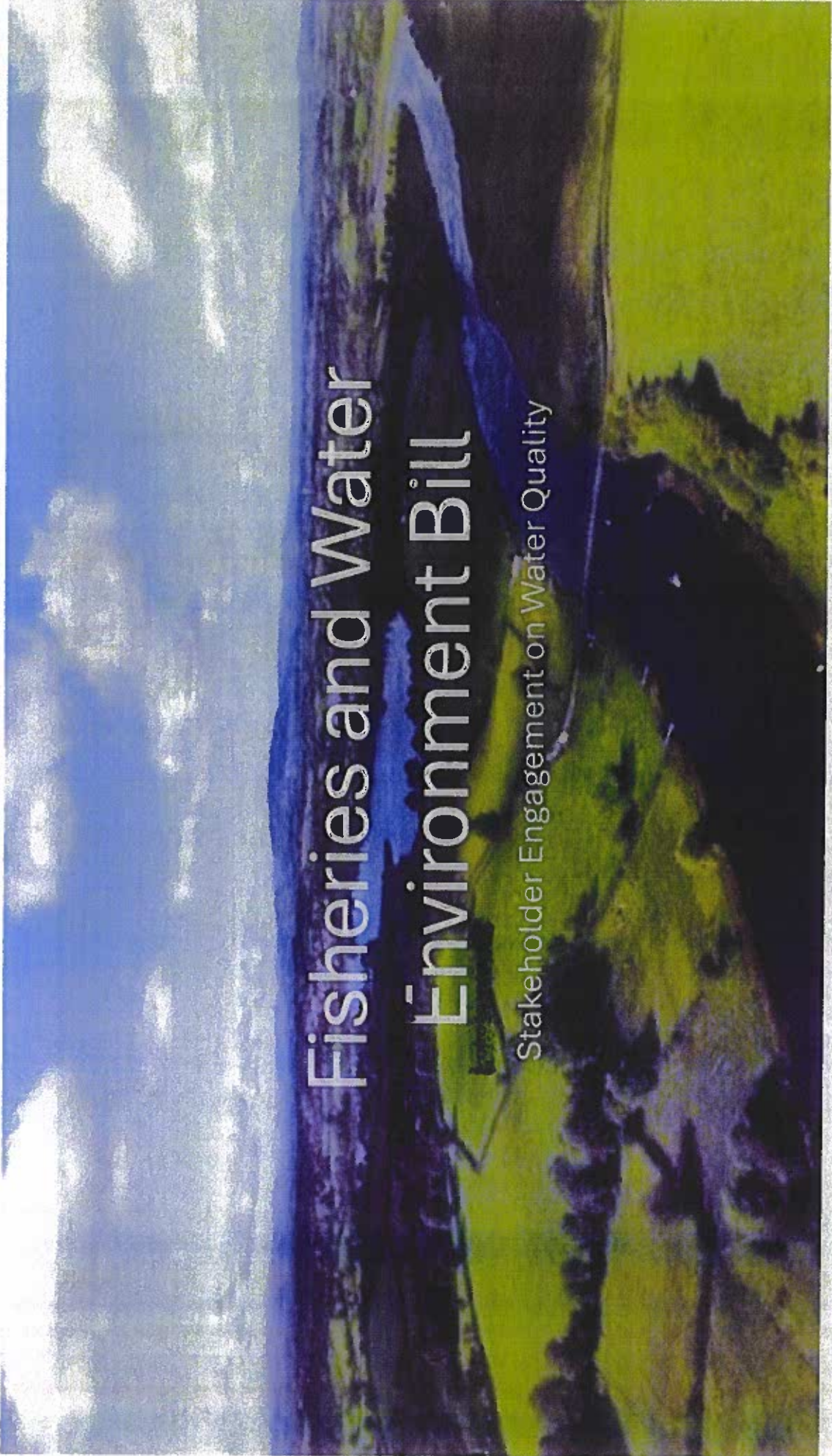
- Recognition of industries already taking steps to reduce pollution.
- Avoid grouping responsible businesses with deliberate polluters.

As outlined, the next steps are to complete a draft policy and share with Minister, following which a policy proposal will be launched for public consultation. The timeline is tight for this – consultation should commence during September.

Thank you for your role and your commitment to the constructive discussions which took place. When the consultation is ready for launch, I will be in touch to bring this to your attention,

Many thanks again





Fisheries and Water Environment Bill

Stakeholder Engagement on Water Quality

Fisheries and Water Environment Bill

Agenda for today's session

Welcome and introductions – Deputy Director, Marine and Fisheries Division, DAERA

Policy and legislation – Head of the Fisheries and Water Environment Bill Team

Round table focused discussion on policy options

Round table discussions on the pillars in the RBMP

Facilitator feedback and next steps

12.30 - Close

Summary of discussion on 19th

We discussed:

How the Department can ensure an equitable approach to address any polluter, and any pollutant

The sanctions that would be the most effective deterrent for minor breaches of legislation

How increasing maximum fines may impact compliance, deterrence and industry practices

Feedback from the tables

Question 1 - How the Department can ensure an equitable approach to address any polluter, and any pollutant:

Main Takeaways

- **Equity in enforcement** must balance fairness, proportionality, and sector-specific realities.
- **Education, incentives, and communication** are as vital as penalties in driving behaviour change.
- **Judicial reform and consistent application of fines** are needed to make enforcement effective.
- **Collaboration and tailored engagement** will help build public and sectoral support.
- **Sensitivity to social impacts**, especially in rural communities, is crucial for maintaining trust and fairness.



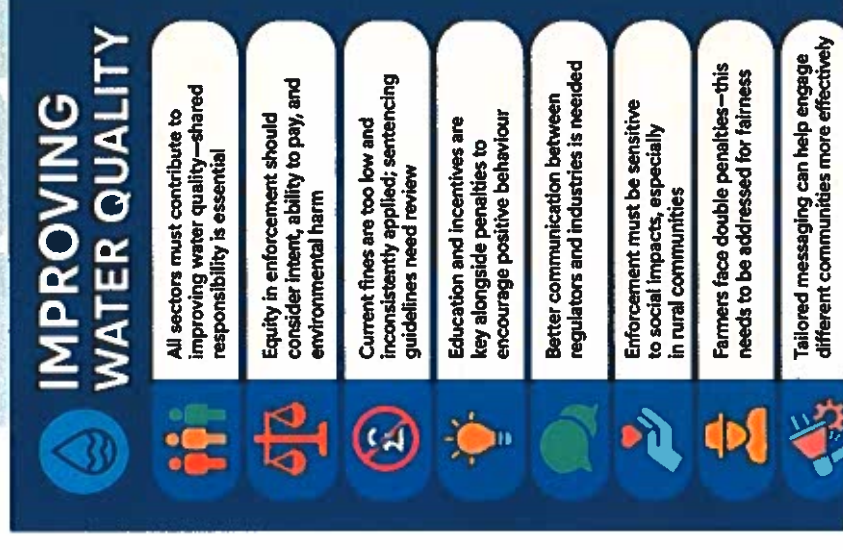
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Feedback from the tables

Question 2 - The sanctions that would be the most effective deterrent for minor breaches of legislation

Main Takeaways

- A tiered, proportionate enforcement system is preferred, with FPNs and civil sanctions for minor breaches.
- Education and support should be the first step, with enforcement as a last resort.
- Restorative justice and reputational consequences are valuable deterrents.
- Clarity, fairness, and consistency in enforcement are essential to build trust and ensure compliance.



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Feedback from the tables

Question 3 - How increasing maximum fines may impact compliance, deterrence and industry practices

Main Takeaways

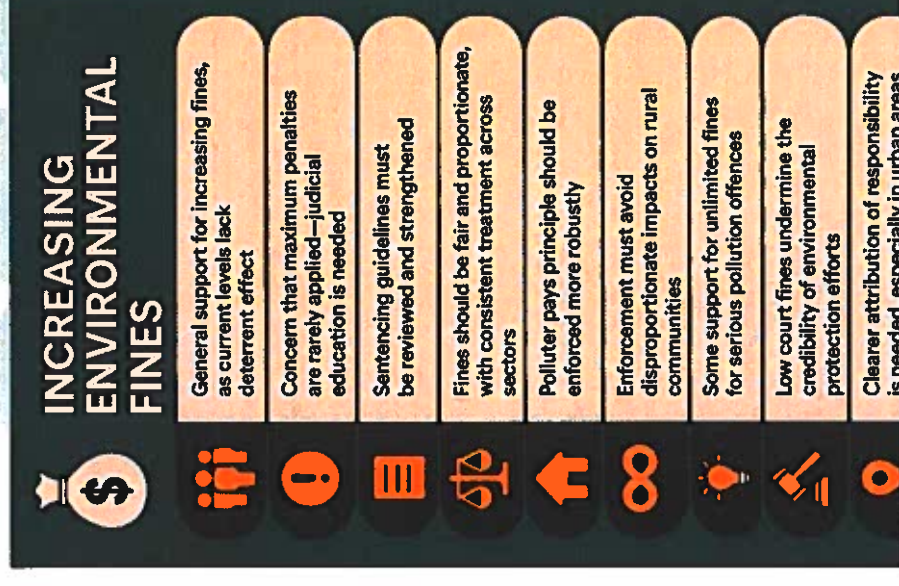
- Increasing the maximum fine is broadly supported but must be matched by effective judicial enforcement.
- A fair, proportionate, and transparent system is essential to maintain public and sectoral trust.
- Education and preventative measures should accompany any changes to enforcement policy.
- Sector-wide consistency and avoidance of rural bias are critical for equitable implementation.
- Strengthening the polluter pays principle will reinforce accountability and drive better industry practices



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Learning from session 1 - Question

HAVE WE
CAPTURED
EVERYTHING FROM
THE LAST SESSION?



IS THERE ANYTHING
ADDITIONAL WE
NEED TO TAKE
ACCOUNT OF?

Learning from session 1

The stakeholder feedback supports a shift toward:

- **Investing** in long-term, collaborative environmental solutions.
- **Incentivising** positive behaviour.
- **Innovative** enforcement and restoration strategies that are more effective, fair, and engaging.



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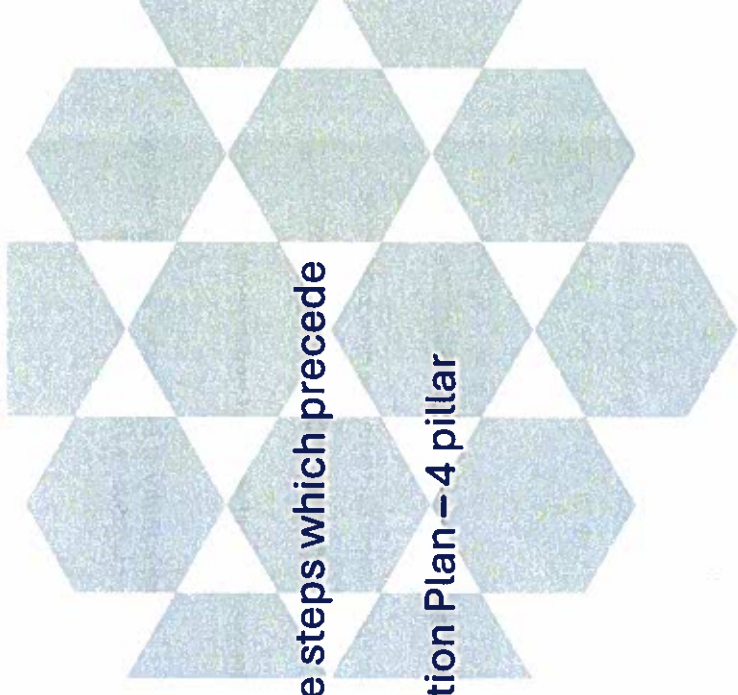
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Learning from session 1

Clear need to ensure that any policy position is clear on the steps which precede enforcement.

This aligns with the approach taken in the Lough Neagh Action Plan – 4 pillar approach.

- **Education**
- **Investment (through incentivisation and innovation)**
- **Regulation**
- **Enforcement**



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Evidence from the feedback

Education

This theme is consistently emphasized:

- **Pollution prevention education** is seen as essential.
- **Eco-schools** and early education initiatives are suggested to build long-term environmental awareness.
- Stakeholders advocate for **education-first approaches**, especially for first-time or accidental breaches.
- **Judicial education** is recommended to improve understanding of environmental harm.

Investment, Incentivisation, and Innovation

These elements are interwoven:

- **Financial assistance schemes** are proposed to support catchment-scale collaboration.
- **Incentives for good practices** are encouraged to promote voluntary compliance.
- **Reparative sanctions** (e.g. fines funding habitat restoration) reflect innovative enforcement.
- Interest in **nature-based solutions** and **restorative justice models** shows openness to innovation.



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Evidence from the feedback



Regulation

Stakeholders call for:

- **Clear definitions of equity and proportionality in enforcement.**
- **Updated sentencing guidelines and consistent application of fines.**
- **A traffic light system for escalating penalties.**
- **Cross-border regulatory alignment with the Republic of Ireland.**

Enforcement

This is a dominant theme:

- Support for **Fixed Penalty Notices (FPNs)** and **civil sanctions** for minor breaches.
- Calls for **higher maximum fines and stronger judicial application.**
- Emphasis on **fairness and transparency**, avoiding double penalties.
- Enforcement should be a **last resort**, preceded by education and support.



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Fisheries and Water Environment Bill

Policy – link between this and legislation

The difference between a policy on protection of the water environment and primary legislation to give it effect lies in their purpose, authority, and function:



Policy

Definition: A policy is a strategic plan or framework developed by government departments to guide decision-making and set priorities.

Purpose: It outlines goals, principles, and intended outcomes—for example, improving water quality, promoting sustainable use, or protecting ecosystems.

Status: Policies are not legally binding on their own.



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Fisheries and Water Environment Bill

Policy – link between this and legislation

Primary Legislation

Definition: Primary legislation refers to Acts passed by the Northern Ireland Assembly or UK Parliament that have legal force.

Purpose: It provides the legal authority to implement policy objectives, including powers for enforcement, regulation, and penalties.

Status: Legally binding and enforceable in court.

How They Work Together

Policy informs legislation by identifying problems, setting goals, and proposing solutions.

Legislation enables policy by creating enforceable rules, powers, and structures to achieve those goals.



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Fisheries and Water Environment Bill

Why make primary legislation to support the protection of the Water Environment?

1. Strengthening Enforcement Powers

Primary legislation provides the legal authority to:

- Impose penalties and sanctions for pollution offences.
- Enable civil and criminal enforcement mechanisms, including Fixed Penalty Notices and environmental liability recovery
- Ensure consistency and proportionality in enforcement across sectors.

2. Addressing Historical Gaps and Weaknesses

- Earlier legislation was seen as outdated and fragmented, with lesser pollution control compared to England and Wales
- Reform needed to modernise enforcement tools and align with best practices in other UK jurisdictions.

3. Implementing the Polluter Pays Principle

- Legislation is essential to enforce the principle that polluters should bear the cost of environmental damage.
- This includes enabling cost recovery for remediation and restoration efforts



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Policy options



Policy options

Discussion – do you think that everything we discussed last week is linked in some way to one of the options?

If not – is there another option you could suggest?

4 pillars



How do you feel that this approach would work?



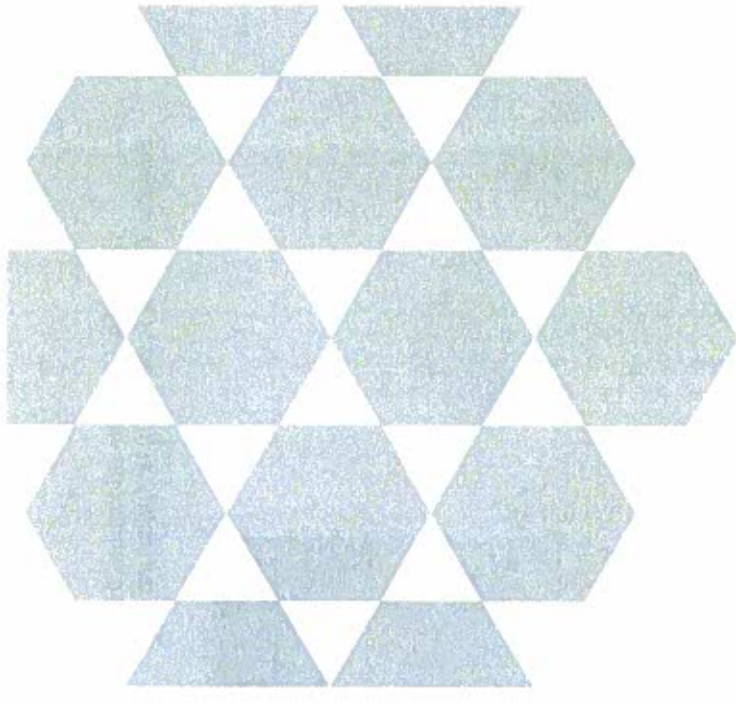
What is the fit between River Basin management planning and the 4 pillars in the Lough Neagh Action Plan?

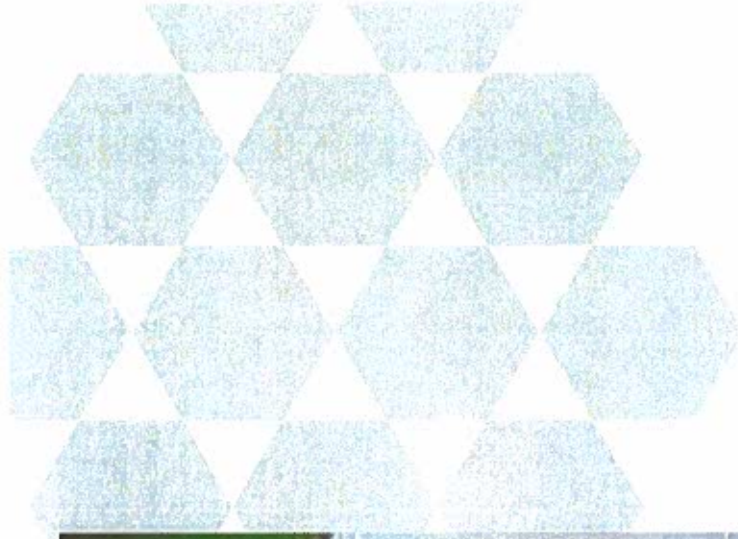
Next steps

Consider feedback from today.

Develop a policy position for Minister to consider
Policy consultation

..and then draft the legal instructions





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DAERA Marine and Fisheries Bill Team

From: DAERA Marine and Fisheries Bill Team

Sent: 11 September 2025 09:14

Subject: Fisheries and Water Environment Bill - policy consultation - protection of the water environment

Dear All,

We are pleased to announce the Minister for the Department for Agriculture, Environment and Rural Affairs (DAERA) has today launched a public consultation on policy proposals relating to the protection of the water environment to inform the forthcoming Fisheries and Water Environment Bill.

The consultation outlines a range of policy proposals to be incorporated into the new legislation.

We would encourage you to respond to the consultation as this will provide us with a better understanding of your views.

A link to the consultation and associated documents can be found below. This will also direct you to the Citizen Space website which is hosting the online survey.

[Fisheries and Water Environment Bill – Protection of the Water Environment | Department of Agriculture, Environment and Rural Affairs](#)

Whilst we have not planned any formal consultation events, we are more than happy to meet with you during the consultation period if you would find it helpful to discuss the proposals with us, prior to submitting a consultation response.

We look forward to hearing from you.

Fisheries and Water Environment Bill Team

Marine & Fisheries Division

Department of Agriculture, Environment and Rural Affairs

Clare House,

303 Airport Road West,

Belfast,

BT3 9ED

MarineandFisheriesBillTeam@daera-ni.gov.uk

DAERA Marine and Fisheries Bill Team

From: DAERA Marine and Fisheries Bill Team

Sent: 10 April 2026 12:38

Subject: Fisheries and Water Environment Bill and Protection of the Water Environment Consultations Summary & Analysis

All,

Thank you to everyone who took part in the consultations on the Fisheries and Water Environment Bill and Protection of the Water Environment. We appreciate the time, effort and contributions provided.

Responses have been extensively reviewed and analysed, and we can now share a copy of our analysis with you.

The attached document has also been published online today and is available to view on the DAERA website via the attached link.

[Summary of the responses to the Consultations on The Fisheries and Water Environment Bill and The Protection of the Water Environment | Department of Agriculture, Environment and Rural Affairs](#)

Kind regards,

Fisheries and Water Environment Bill Team

From: [REDACTED]@mpani.org
To: [REDACTED]
Cc: [REDACTED]
Subject: WRU 2024-11 - [REDACTED] RE: NIEA / MPANI Wise Use of Water best practice guidance
Date: 13 February 2024 09:47:30
Attachments: image001.gif

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[REDACTED]

This is extremely disappointing and a clear reflection of the well documented resource challenges within DAERA. We have circulated the updated Wise Use of Water to our Members and encouraged them to continue to follow and adopt the best practice within it. MPANI have already written a briefing paper to the Minister, [REDACTED], in which we highlight our grave concerns about the lack of experience and knowledge within parts of DAERA. We will also be taking this matter up with Assembly AERA Committee.

Many thanks

[REDACTED]
Regional Director

T: [REDACTED] E: [REDACTED] W: www.mpani.org
Mineral Products Association (Northern Ireland) Ltd, Unit 10 Nutts Corner Business Park,
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From: [REDACTED]@daera-ni.gov.uk>
Sent: 13 February 2024 07:30

To: [REDACTED]@mpani.org

Cc: [REDACTED]

[REDACTED] > [REDACTED] <[REDACTED]>

Subject: NIEA / MPANI Wise Use of Water best practice guidance

[REDACTED]

My apologies for not coming back to you sooner.

Unfortunately we do not have the resource to deliver the appropriate review and sign off on the "Wise Use of Water Best Practice Guidance"

I have cc'd [REDACTED] Head of the Regulation Unit, if you wish to escalate the matter.

Many Thanks

From: [REDACTED]@mpani.org <[REDACTED]@mpani.org>

Sent: Tuesday, February 6, 2024 2:05 PM

To: [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Subject: FW: NIEA / MPANI Wise Use of Water best practice guidance

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Hi [REDACTED]

Just following on from my email of 26th January.

We would really like to make progress on final sign off of the updated "Wise Use of Water best practice guidance. I would be grateful if you could get in touch with me.

[REDACTED]
Regional Director

T: [REDACTED] E: [REDACTED] W: www.mpani.org

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From: [REDACTED]@mpani.org <[REDACTED]@mpani.org>

Sent: 26 January 2024 11:48

To: [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Subject: NIEA / MPANI Wise Use of Water best practice guidance

Hi [REDACTED]

I hope you are well.

Would it be possible to arrange a meeting / conversation with you regarding the **Wise Use of Water Guidance** that has been updated and is awaiting clearance / sign off from Senior DAERA Management. This guidance has proven to be of great value over the years since it was first jointly published by our two organisations. I would go as far as stating it's one of the reasons why the environmental performance of the quarry industry in NI has improved so much, particularly in the area of water management.

Look forward to hearing from you.

[REDACTED]
Regional Director

T: [REDACTED] E: [REDACTED]@mpani.org W: www.mpani.org

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From: [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Sent: 24 October 2023 08:27

To: [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Cc: [REDACTED] <[REDACTED]@daera-ni.gov.uk>; [REDACTED]; [REDACTED]
[REDACTED]@daera-ni.gov.uk>; [REDACTED] <[REDACTED]@mpani.org>

Subject: RE: MPANI

Hi [REDACTED],

Unfortunately the decision has been made to postpone this event. I had let those people on the group distribution list know, but should have included you in the email for information.

Cheers,

[REDACTED]

[REDACTED]

[REDACTED]

Conservation Science

Northern Ireland Environment Agency

From: [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Sent: Monday, October 23, 2023 5:49 PM

To: [REDACTED] <[REDACTED]@mpani.org>

Cc: [REDACTED] <[REDACTED]@daera-ni.gov.uk>; [REDACTED]; [REDACTED]
[REDACTED]@daera-ni.gov.uk>; [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Subject: MPANI

[REDACTED]

Apologies again.

Due to workload pressures and conflicting priorities NIEA Water Regulation are not in a position

to field a representative to present at the event scheduled on 26th October.

Once the Guidance has passed through the approval process, NIEA will work with MPANI to organise another event with the industry.

Many Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@mpani.org>

Sent: Thursday, October 12, 2023 10:43 AM

To: [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Cc: [REDACTED] <[REDACTED]@daera-ni.gov.uk>; [REDACTED];
<[REDACTED]@daera-ni.gov.uk>; [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Subject: Re: 'Draft' NIEA Foreword

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Hi [REDACTED]

That's extremely disappointing. As I am sure you are aware The document is not new but is a 3rd revision of the guidance that was first published in 2008 and then revised in 2015. At the time of publication it was widely praised and recognised as a great example of responsible industry working in partnership with Government to promote best practice and protection of the environment.

In terms of the agenda and the event on the 26th we will make it clear the 3rd revision is not finalised and cleared at senior level.

Regards

[REDACTED]

Sent from my iPhone

On 12 Oct 2023, at 09:29, [REDACTED] <[REDACTED]@daera-ni.gov.uk> wrote:

[REDACTED]

To flag the guidance document will not be finalised/ approved/ endorsed in time for the planned workshop on 25th October.

It would be wise to amend the proposed agenda to reflect that the guidance has

not been finalised.

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@daera-ni.gov.uk>

Sent: Monday, September 18, 2023 4:00 PM

To: [REDACTED] <[REDACTED]@mpani.org> [REDACTED]

Cc: [REDACTED] <[REDACTED]@daera-ni.gov.uk>; [REDACTED]

<[REDACTED]@daera-ni.gov.uk>; [REDACTED]

<[REDACTED]@daera-ni.gov.uk>

Subject: 'Draft' NIEA Foreword

[REDACTED], [REDACTED]

For inclusion in the latest review doc.

This will need final senior management / corporate clearance.

Thanks [REDACTED]

[REDACTED]

From: DAERA Planning Response Team
Sent: 12 May 2025 11:28
To: gbest@mpni.org
Subject: DAERA PRT HOB - Awaiting a Response from NED

Gordon,

Further to the email from [REDACTED] below, please note a response was uploaded on 30/4/25.

Regards

[REDACTED]

[REDACTED] | **Planning Response Team (PRT)**
Department of Agriculture, Environment and Rural Affairs (DAERA)
Northern Ireland Environment Agency (NIEA)

For NIEA Planning Queries; ☎ +4428 90569604 | ✉ planningresponse.team@daera-ni.gov.uk |
📍 **NIEA Lisburn** | 17 Antrim Road | Lisburn | BT28 3AL | **Web** <https://www.daera-ni.gov.uk/>



Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
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From: [REDACTED]
Sent: 08 April 2025 17:08
To: gbest@mpni.org
Cc: [REDACTED]
[REDACTED] DAERA NIEA Plan <NIEAPlan@daera-ni.gov.uk>
Subject: DAERA PRT HOB - Awaiting a Response from NED

Gordon

Many thanks for your email and apologies for not responding sooner!

I have asked the team to look at this and note we are currently awaiting a response from our colleagues in NED. As you may be aware the Department is currently experiencing a very heavy workload resulting in delays to planning consultation responses and we are not prioritising any cases. A response to this case will be issued as soon as possible.

I have copied by colleges in CC&L into this reply to alert them to your email and also copied [REDACTED] and [REDACTED]

[REDACTED] please can you keep this on B/F and alert Gordon as soon as this reply issues.

Thanks

[REDACTED]
Central Services Team
Head of Chief Executive's Office & Planning Response Team
Northern Ireland Environment Agency

17 Antrim road, LISBURN, BT28 3AL



Web: <https://www.daera-ni.gov.uk/>

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an' Kintra Matters

From: gbest@mpani.org <gbest@mpani.org>

Sent: 12 March 2025 15:29

To: [REDACTED]

Cc: [REDACTED]; [REDACTED]
[REDACTED]

Subject: Waiting on response from NIEA

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

One of our Members, Gibson Bros, have been waiting some time now for a consultation response from NIEA for the planning application at their Quarry, Kilmacrew Road, Banbridge.

The Application Reference is LA08/2023/3001/F.

The consultation was sent on 08 Nov 2024 so if any of your colleagues could provide us with an update and possible progress this response it would be appreciated.

Many thanks in advance for your help

Gordon Best
Regional Director

T: 02890824078 E: info@mpani.org W: www.mpani.org

Mineral Products Association (Northern Ireland) Ltd, Unit 10 Nutts Corner Business Park, Dundrod Road, Crumlin, Co Antrim, BT29 4SR

[REDACTED]

From: [REDACTED] <info@mpani.org>
Sent: 17 July 2026 11:02
To: [REDACTED]
Cc: Gordon Best
Subject: RE: Re: NIEA Meeting - Request for Availability

Follow Up Flag: Follow up
Flag Status: Flagged

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Morning [REDACTED]

Please see the list of attendees below:

Gordon Best- gbest@mpani.org
William Doherty- wdohertry@creaghconcrete.com
Paul Hamill- phamill@fpmccann.co.uk
Rebecca Mitchell- RMitchell@northstone-ni.com
Chris Tinsley- chris@quarryplan.co.uk

Let me know if you need anything else

[REDACTED]
Kind regards
[REDACTED]



From: [REDACTED]
Sent: 17 July 2026 10:28
To: Gordon Best <gbest@mpani.org>; [REDACTED] <info@mpani.org>
Subject: RE: Re: NIEA Meeting - Request for Availability

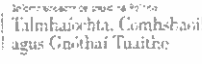
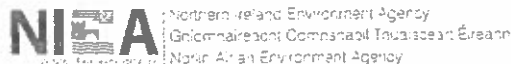
Good morning Gordon,

Could you please confirm the names and email addresses of the 5 attendees you will bring to the meeting with Teresa on 30 July? I will issue the invite asap.

Kind regards,
[REDACTED]

[REDACTED] | Planning Response Team (PRT)

For NIEA Planning Queries; ☎ +4428 90569604 | ✉ planningresponse.team@daera-ni.gov.uk |
📍 NIEA Lisburn | 17 Antrim Road | Lisburn | BT28 3AL | Web <https://www.daera-ni.gov.uk/>



From: Gordon Best <gbest@mpni.org>
Sent: 10 July 2026 11:09
To: [REDACTED]
Cc: [REDACTED]
Subject: CM: Re: NIEA Meeting - Request for Availability

[REDACTED]

There will be a total of 5. Yes, NIEA offices in Lisburn will suit well!!

Gordon

Sent from Outlook for iOS

From: [REDACTED]
Sent: Friday, 10 July 2026 20:05:03
To: Gordon Best <gbest@mpni.org>; [REDACTED]
Cc: [REDACTED]
Subject: RE: NIEA Meeting - Request for Availability

Many thanks Gordon.

In order to reserve a big enough room for the meeting, please confirm the number of attendees you will bring.

Please also advise if Lisburn NIEA would be a convenient location for you.

Kind regards,

[REDACTED]

From: Gordon Best <gbest@mpni.org>
Sent: 10 July 2026 10:58
To: [REDACTED]
Cc: [REDACTED]
Subject: Re: NIEA Meeting - Request for Availability

In the diary!!

Gordon

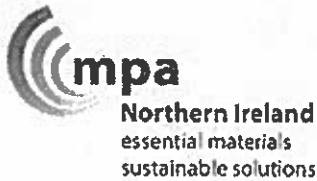
Sent from Outlook for iOS

From: [REDACTED]
Sent: Friday, 10 July 2026 19:56:54
To: [REDACTED]; Gordon Best <gbest@mpni.org>
Cc: [REDACTED]
Subject: RE: NIEA Meeting - Request for Availability

Hi [REDACTED]

I have made a note in the diary.

Kind regards
[REDACTED]



From: [REDACTED]
Sent: 10 July 2026 10:40
To: Gordon Best <gbest@mpni.org>; [REDACTED]
Cc: [REDACTED]
Subject: RE: NIEA Meeting - Request for Availability

Good morning Gordan,

Would you be able to hold **Thursday 30 July, 10.00 am – 12.00 pm** in your diary for a meeting with NIEA, please?

I am currently confirming attendees from our side and will send the formal meeting invitation once these have been finalised.

Many thanks,
[REDACTED]

[REDACTED] | **Planning Response Team (PRT)**
Department of Agriculture, Environment and Rural Affairs (DAERA)
Northern Ireland Environment Agency (NIEA)

For NIEA Planning Queries; ☎ +4428 90569604 | ✉ planningresponse.team@daera-ni.gov.uk |
NIEA Lisburn | 17 Antrim Road | Lisburn | BT28 3AL | Web <https://www.daera-ni.gov.uk/>

NIEA Northern Ireland Environment Agency
Gríomnáireacht Comhshaoil Thuaisceart Éireann
Northern Ireland Environment Agency

 An Agency within the Department of
Agriculture, Environment
and Rural Affairs
An tAidiantóir sa Roinn
Talmhaíochta, Comhshaoil
agus Cnothaí Tuaithe

An tAidiantóir sa Roinn
Talmhaíochta, Comhshaoil
agus Cnothaí Tuaithe

An tAidiantóir sa Roinn
Talmhaíochta, Comhshaoil
agus Cnothaí Tuaithe

From: Gordon Best <gbest@mpni.org>

Sent: 09 July 2026 22:40

To: [REDACTED]

Subject: Re: NIEA Meeting - Request for Availability

[REDACTED]

I am available

29th, 30th, 31st July

11th August

Gordon

Sent from Outlook for iOS

From: [REDACTED]

Sent: Thursday, 09 July 2026 23:57:20

To: Gordon Best <gbest@mpni.org>; [REDACTED]

Subject: NIEA Meeting - Request for Availability

Good afternoon [REDACTED]

I am trying to schedule a meeting with Gordon Best and NIEA and am seeking Gordon's availability during late July/early August.

Please see current availability for Teresa O'Neill in July/August:

- Monday 20 July – am/pm
- Wednesday 22 July – pm
- Thursday 23 July – 2 - 3pm
- Monday 27 July – am
- Wednesday 29 July – pm
- Thursday 30 July – am/pm (before 4pm)
- Monday 20 July – am/pm
- Wednesday 5 August – pm
- Tuesday 11 August - pm
- Wednesday 12 August - pm
- Thursday 13 August – 2 - 3pm

Please let me know which option best suits, so we can hold it in [REDACTED] diary.

Kind regards,

[REDACTED]

Planning Response Team (PRT)

Department of Agriculture, Environment and Rural Affairs (DAERA)
Northern Ireland Environment Agency (NIEA)

For NIEA Planning Queries; ☎ +4428 90569604 | ✉ planningresponse.team@daera-ni.gov.uk |

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Northern Ireland Environment Agency
Griomhaireacht Comhshaoil Thuaisceán Éireann
www.daera-ni.gov.uk | Northern Ireland Environment Agency



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and Rural Affairs
www.daera-ni.gov.uk

Gríomhaireacht sa tSúil na Riaracháin
Talmhaíochta, Comhshaoil
agus Grótháí Tuaithe

An Agency within the Department of
Fáirimh, Environment
an' Aintra Matthers

From: [REDACTED]
Sent: 09 June 2026 15:37
To: 'Gordon Best'
Cc: [REDACTED]
Subject: CM: RE: Progress on MPANI Members Applications

Good Afternoon Gordon,

Good to hear from you and thank you for your email.

I have checked the status of the cases you have referred to and provided estimated timeframes as set out below. You will be aware that within NED, there are new team structures which focus on working on 2025/26 cases and new cases after the 1 April 2026. The cases you have requested an update on are within the 2025/26 caseload with NED and as such the indicative timeframes set out below apply.

I have also included the link for the planning consultation updates that is currently on our website for your information. These timeframes on the website are updated regularly to reflect progress within teams as they move through the backlog. At the moment teams are on target to clear the 2025/26 back log by the end of September 2026.

Please note that these timeframes are indicative and may be subject to change depending on case complexity or if progress is made more quickly.

www.daera-ni.gov.uk/articles/daera-planning-consultations-update

Hopefully this information is helpful to you and your members. You should receive a response to your letter from Katrina Godfrey in the coming days and I will be in touch to arrange a meeting as discussed.

1. Planning Reference Number: LA11/2025/0161/F

This case was received on 10 December 2026. At the moment case officers within the NED team assessing 2025/26 cases are working on cases received in December 2025, the timeframe for responses for cases received in December is 3 weeks.

2. Planning Reference Number: LA01/2025/0058/F

The response to this case was issued to the Planning Authority at Causeway, Coast & Glens Borough Council on the 15 May 2026 and there are no outstanding consultations currently with the Department at this time.

3. Planning Reference Number: LA08/2023/3001/F

This case was received on 30 January 2026. At the moment case officers within the team assessing 2025/26 cases are working on cases received in December 2025, the timeframe for responses for cases received in January 2026 is 7 weeks.

Many Thanks

Planning Improvement Plan
Department of Agriculture, Environment and Rural Affairs (DAERA)
Northern Ireland Environment Agency (NIEA)

Lisburn NIEA| 17 Antrim Road| Lisburn| BT28 3AL

Web <https://www.daera-ni.gov.uk/>

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Northern Ireland Environment Agency
Gníomhaireacht Comhshaoil Thuaisceart Éireann
Norlin Airlan Environment Agency



An Agency within the Department of
Agriculture, Environment
and Rural Affairs
www.daera-ni.gov.uk

Gníomhaireacht
Ta

From: Gordon Best <gbest@mpani.org>

Sent: 09 June 2026 11:27

To: [REDACTED]

Subject: Progress on MPANI Members Applications

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Apologies, but I had emailed this to [REDACTED] and you last Friday but have realised I mis-spelled your surname.

Hi [REDACTED]

Once again, many thanks for the chance to talk last week with you [REDACTED] and hear of the changes and progress being made within NIEA and in particular NED. Following my letter to Katrina I look forward to a face to face meeting late July / early August to hear more about the improvements and restructuring within your teams.

In the meantime would it be possible to get a quick update on the applications listed below as they have been with you for some time and the delays in coming back to council are creating significant worry and stress for our members concerned as they worry that a number of studies they have paid for and carried out will run out of time.

1. planning Reference Number: LA11/2025/0161/F

Council: Derry City and Strabane District Council

Applicant: P Keenan Quarries

Proposal: A 1.95 hectare lateral south westerly extension of the existing quarry, to a depth contiguous with the permitted floor at Letterbrat Quarry, including restoration.

Date of Consultation: 10th December 2025

2. Planning Reference Number: LA01/2025/0058/F

Council: Causeway Coast and Glens BC

Applicant: P Keenan Quarries

Proposal: The phased winning and working of mineral (basalt) comprising of a lateral northerly extension to the existing quarry to a maximum depth of 182mAOD, the construction of internal haul roads, the erection of earthen screening bunds, the storage of overburden and the restoration of the Site to biodiversity afteruses and all ancillary development associated with the same.

Date of Consultation: 16th April 2026

3. LA08/2023/3001/F Gibsons Quarry Banbridge

I appreciate your teams are working hard to get through the back-log of cases, but just an indication of remaining timescales on a decision on their applications would be greatly appreciated.

Many thanks

Gordon Best

Regional Director

T: 02890824078

E: info@mpa-ni.org

W: www.mpani.org

Mineral Products Association (Northern Ireland) Ltd, Unit 10 Nutts Corner Business Park, Dundrod Road, Crumlin, Co Antrim, BT29 4SR



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