

Response ID ANON-QPG9-2MFY-Y

Submitted to Public Consultation on Northern Ireland's draft Climate Action Plan 2023-2027
Submitted on 2025-10-02 10:06:30

Further information about the consultation

About You

A What is your name?

Name:
Nichola Hughes

B What is your email address?

Email:
nichola@sustainableni.org

C What is your postcode?

Postcode:
BT12 7DG

D Are you responding as an individual or as part of an organisation?

Organisation (Please tell us your organisation name or what sector you operate in)

Organisation:
Sustainable NI

Relates to Chapter 5: Quantification Summary

1 To what extent do you agree with the quantification methodology used to calculate emissions reductions from policies and proposals?

Agree

Please provide your reasons and any alternatives::

We note that some sector leads commissioned external organisations to undertake modelling of projected emissions reductions from policies and proposals, whilst others conducted the quantification internally by policy analysts. Whilst variation in methodologies is not ideal, by using the standardised UK GHG Inventory Reporting Protocol and the latest GHG Inventory data the quantification methodology is credible and robust.

2 Do you have any comments on the quantification methodology used to calculate emissions reductions from policies and proposals?

No

If yes, please provide your comments:

Relates to Chapter 6: Sector Policies and Proposals

3 To what extent do you agree or disagree that the proposed policies and proposals will effectively reduce emissions for the energy sector?

Agree

Please provide your reasons and any alternatives::

The consultation acknowledges the critical role that a replacement renewable energy support scheme will have both in terms of meeting climate objectives and also the 80% of electricity consumption from renewable energy by 2030 target. We look forward to seeing more detail on the Renewable Electricity Support Scheme for Northern Ireland. The scheme will need to resolve barriers to renewable energy deployment, which include a lack of financial incentives and uncompetitive planning timelines. DfE must remove planning barriers swiftly, enabling new renewable projects to be delivered faster and at lower cost.

Another key barrier to renewable electricity generation has been managing the grid impacts of renewable technologies. The energy transition will require significant upgrades to the electricity network. NIE Networks has begun the initial phases of procurement as part of its planned £2.3 billion investment over the next six years to upgrade the electricity transmission and distribution network. Significantly more investment will be needed than is currently planned to meet rising electricity demand and increased supply of renewable electricity. Proposals need to set out how DfE will work with NI Electricity Networks to strengthen the grid, streamline planning approvals and remove policy uncertainty, all of which are currently hindering progress in this sector.

4 To what extent do you agree with the proposed approach to achieving a just transition in the energy sector?

Strongly agree

Please provide your reasons and any alternatives::

Policies and proposals listed in the Energy Section consider the importance of consumer protection, affordability and fairness, all of which are Just Transition Principles. The document also cites the importance of upskilling the workforce in and new green jobs that will be created through, for example, the Offshore Renewable Energy Action Plan.

We note that while the requirement for a Just Transition Commission exists in law, it was not operational in time to influence the drafting of the CAP or the Policies and Proposals referenced within it, undermining the Commission's ability to shape energy sector policies. This could result in a lack of equity-focus in energy policies.

There is also some ambiguity around funding to support communities most affected by the energy transition, for example in rural areas, or in areas where manufacturing industries are most prevalent. There is no detail or clarity on how success in achieving a just transition will be measured across energy policies. We also note there is an opportunity for greater worker participation in co-designing energy sector plans, to ensure voices from fossil fuel dependent sectors and localities are heard.

Relates to Chapter 6: Sector Policies and Proposals

5 To what extent do you agree with the proposed policies and proposals to reduce emissions for the transport sector?

Neither agree nor disagree

Please provide your reasons and any alternatives::

The CAP provides a robust strategic framework to align Northern Ireland's transport policies with the net zero emissions target by 2050. However, at present, the transport policies and proposals are too high-level to confidently assess their direct impact on emissions reductions. They lack detailed implementation plans or targets. Whilst the plan establishes the right guiding principles and signals strong intent, it doesn't describe delivery mechanisms to understand if transport decarbonisation will happen at the pace required.

6 To what extent do you agree with the proposed approach to achieving a just transition in the transport sector?

Disagree

Please provide your reasons and any alternatives::

The Climate Action Plan provides a good foundation for a just transition in the transport sector, significantly strengthened by the legal requirement for a minimum level of active travel funding. This investment will be critical for people in urban areas and for those without access to cars. E-Bikes in particular provide a significant opportunity to provide people with access to affordable sustainable transport. A rapid expansion of safe, segregated cycle lanes in urban areas will be key to a modal shift to travel by bicycles & e-bicycles.

The proposed expansion of EV charging infrastructure in public and workplace settings is also vital, especially in rural areas. If delivered well, it will avoid excluding rural communities from the low-carbon transition. However, there is a strong focus in the draft CAP on private solutions like EV ownership which low-income households will not be able to afford in the short term. This could risk deepening transport inequality. Policies in this area should consider targeted financial support, such as grants, for low-income households and consider instruments to promote the used EV market as well as incentives for rural users.

Northern Ireland has a large rural population where active travel is not feasible. Public transport should be the corner stone of a just transition in the transport sector. Yet, within the 'Shift' Policy listed, there is no dedicated programme to electrify buses or make public transport more affordable or accessible. Policy design in this area should consider pricing reform, rural service expansion, and modal shift strategies to reduce car dependence. Additionally, there is no mechanism for the co-design of transport plans with communities, local councils, or transport users, particularly marginalised or rural groups, which could risk leaving people behind. Like Scotland, Northern Ireland should develop a Just Transition Transport Plan to fully address job transitions in the transport sector including reskilling, manufacturing opportunities and logistics.

Relates to Chapter 6: Sector Policies and Proposals

7 To what extent do you agree with the proposed policies and proposals to reduce emissions for the business and industrial processes sector?

Neither agree nor disagree

Please provide your reasons and any alternatives::

UK and EU-led Regulation, Compliance and Reporting will undoubtedly do a lot of the heavy lifting in generating carbon reductions in this sector, however given that the NI economy has a higher composition of small and medium-sized enterprises than the rest of the UK, government support to enable small businesses to decarbonise will be critical. We have provided a short review of the Northern Ireland-led policies and proposals below:

Fuel Switching to Natural Gas:

It is important that this policy signals to the energy market that natural gas, like coal and oil, has an expiry date. The policy should oversee the phase out of gas, with clear timelines, rather than increase investment in gas infrastructure to the detriment of investment in other clean renewable fuels. An example of this is gas price controls. The current natural gas price control period 2023-2028 has allowances for fuel switching to gas. The next gas price control period must initiate a reduction in these allowances to encourage fuel switching to electric forms of heating at scale. The Fuel Switching to Natural Gas policy is based on the idea that, over time, the gas network will transition away from natural gas to lower-carbon alternatives like biomethane and potentially hydrogen. However, this approach has significant weaknesses. In the United States, where biomethane is already widely in use, studies have shown that its production and distribution can result in methane leaks known as fugitive emissions. As methane is a powerful greenhouse gas, these leaks can actually worsen climate change rather than reduce emissions, challenging the claim that biomethane is a climate-neutral fuel (see Wera et al., 2021, Environmental Science & Technology).

Additionally, scientific evidence suggests that hydrogen should only be used in situations where electrification is not possible. This is because converting electricity into hydrogen and then using it to produce heat is much less efficient than using electricity directly in heat pumps (see the UK's Climate Change Committee Seventh Carbon Budget report, 2025). Therefore, while gas, biomethane, and hydrogen might have a limited role in certain industrial applications, promoting these fuels across all sectors - including residential heating - could lead to higher emissions that adopting cleaner energy solutions if they are available. It's important that policies reflect this and avoid encouraging fuel switching in cases where better alternatives exist.

Biomethane:

See comments above caveating the role of biomethane in the energy transition.

Uplifts to Building Regulations in Northern Ireland and Further Building Regulations Uplifts:

Since 2022, all new buildings in Northern Ireland are required to achieve a 40% reduction in carbon emissions compared to previous standards, through a combination of improved energy efficiency standards for building fabric and the use of low-carbon heating systems. Whilst uplifts in building regulations are planned in 2026/27, Northern Ireland has not yet set concrete long-term regulatory targets for buildings beyond that. Sustainable NI is calling on the Department of Finance to show a similar level of ambition to Scotland, aiming for a Passivhaus-level standard in all new builds with bans on new oil or gas boilers by 2028 at the latest. Developers that are currently building to Passivhaus standard in Northern Ireland (see Fraser Miller case study) have said 'Passivhaus homes are not necessarily more expensive than traditional houses, it's just a question of skills and training'. This may happen organically in response to rising demand for sustainable homes due to uplifts in building regulations. However, alongside the proposed uplifts in building regulations, Sustainable NI would like to see dedicated government support to upskill the construction sector in modern low-carbon methods of construction.

Invest NI Energy and Resource Efficiency Programme / Invest NI Industrial Decarbonisation for Northern Ireland Project:

One of the current issues with the Energy and Resource Efficiency Programme is that the technical consultancy support is only available for businesses spending over £30k annually on energy and resources which precludes many small businesses. Given there are currently 80,000 registered SMEs in operation across Northern Ireland, more support is needed for smaller businesses with lower annual resource costs. Additionally, businesses supported by both of these programmes face challenges in implementing the measures recommended due to finance constraints, lengthy payback periods, and internal capacity constraints. So, whilst advisory and financial support is available, impact is currently limited. These challenges must be addressed when redesigning the programmes.

8 To what extent do you agree with the proposed approach to achieving a just transition in the business and industrial processes sector?

Agree

Please provide your reasons and any alternatives::

The Industrial Decarbonisation Programme and Energy and Resource Efficiency Programme led by Invest NI can help businesses reduce energy costs, which may protect jobs and competitiveness in the long term. If delivered well, this kind of support could help small and medium-sized enterprises (SMEs) adapt to change without bearing the full financial burden. Similarly, proposed updates to building regulations could drive new skills and job opportunities in construction and green technologies, supporting employment in a low-carbon economy. However, Invest NI's reach is currently limited with only about 6% of businesses actively engaged with its services. This limits its ability to support widespread change or ensure that all businesses, especially smaller ones, benefit equally from the transition.

Given manufacturing industries and construction represent 71.5% of emissions from this sector, there is little detail in the draft Climate Action Plan on how workers in these high-emitting industries will be retrained or supported as industries shift to cleaner technologies. Without clear funding, training programmes, or long-term workforce planning, there is a risk that these communities and sectors could be left behind. Net-zero aligned building, planning and procurement regulations all play a vital role in driving up demand for low-carbon buildings, goods and services, which will in turn support growth in green industries, engineering solutions and technologies.

More inclusive engagement, stronger worker protections, investment in skills, and better access for marginalised groups will need to be addressed in the policies and proposals mentioned in the draft CAP, if Northern Ireland is to ensure a just transition in the business and industrial processes sector.

Relates to Chapter 6: Sector Policies and Proposals

9 To what extent do you agree with the proposed policies and proposals to reduce emissions for the residential buildings sector?

Agree

Please provide your reasons and any alternatives::

Broadly speaking, we welcome the suggested policies and proposals to decarbonise the residential buildings sector listed, with a couple of caveats:

Affordable Warmth Scheme / Warm Healthy Homes Scheme:

The government policy to replace older inefficient oil boilers with more efficient oil boilers should stop, as oil is not compatible with our carbon reduction targets.

NISEP / Scale and Launch Energy Efficiency Programme:

We welcome a radical scaling up of NISEP into a domestic Energy Efficiency Programme that mirrors the breadth of support currently offered in the Republic of Ireland. In addition, stronger incentives are necessary for private homeowners to renovate an existing property rather than demolish and build a new home. This will require collaboration with HM Treasury to review tax incentives in this area, as the current tax regime leans towards demolition.

Clean Heat Market Mechanism:

Deployment of this policy must be carried out alongside energy efficiency improvements in the housing stock as heat pumps are more effective in homes with an EPC of D or above. If they are installed in homes with lower SAP ratings the heat gradient may be too high for the technology to work effectively, resulting in cold homes, potentially leading to mould and damp, which would trigger scepticism in the technology. Policy safeguards must be in place to prevent this from happening.

Gas Network Connections General Determinations 2023-2028:

As previously outlined, this policy is highly controversial as it incentivises fossil fuel use, bypassing heat pumps and geothermal energy for residential heating. The sector summary on P106 lists fuel switching to natural gas first before mentioning support for low carbon heating technologies, which would infer it is a policy priority. Sustainable NI is deeply concerned that the Government's emphasis on natural gas as a short-term 'transition fuel' is being misinterpreted by industry as a 'green light for gas' and is undermining efforts to transition to 100% clean energy as the majority of private sector funding is diverted to gas networks instead of geothermal heat networks. As mentioned previously, there are valid concerns that biomethane and hydrogen are not genuine sustainable fuels therefore the assertion that efforts to scale up gas infrastructure will eventually lead to zero carbon heating is tenuous.

Biomethane:

See comments above.

Further Building Regulations Uplifts in Northern Ireland:

See previous comments recommending Northern Ireland to align to Scotland's ambition that require new developments to build to Passivhaus standard, or equivalent.

There is also an opportunity to strengthen building regulations to help increase tree cover and cut carbon emissions from land use. This can happen by encouraging the use of sustainably sourced timber, which is a low-carbon building material. By promoting low-carbon construction methods via building regulations, government could boost demand for timber and support tree planting.

In addition, we would add a couple of concepts not listed in the consultation that may be useful to consider in the context of residential heating:

District Heating and Thermal Storage:

Sector coupling means linking different parts of the energy system (like electricity, heating, and transport) to cut emissions more affordably. For example, smart air source heat pumps can be added to existing boilers in larger homes to create "hybrid" systems. This can cut carbon quickly, often with minimal changes to the home—sometimes just adding a few larger radiators downstairs.

Also, district heating systems can include long-term thermal storage, which stores heat for later use. This allows more use of wind power by running large central heat pumps when wind energy is plentiful. Heating pipes can be laid under cycle paths, which are rarely dug up, and any works are easier to route around for cyclists than for cars.

Geothermal heat pumps have lower peak electricity demand than air source heat pumps. In Northern Ireland, these could tap into our notable low-grade geothermal resources. Lower-temperature piped heat networks can distribute this heat effectively. This has been delivered successfully in South Wales. The same networks can also provide efficient cooling in summer, which can improve their heating performance in autumn.

10 To what extent do you agree with the proposed approach to achieving a just transition in the residential buildings sector?

Strongly agree

Please provide your reasons and any alternatives::

We support the proposed approach to achieving a just transition in this sector. There could be a risk of public backlash if people feel excluded from the benefits of the green transition, whether due to high costs or negative impacts like rising bills or mould/damp from poor-quality retrofits. We back means-tested grants to protect vulnerable households from unfair costs. Strong safeguards will be needed to ensure energy efficiency measures are installed to a high standard.

Relates to Chapter 6: Sector Policies and Proposals

11 To what extent do you agree with the proposed policies and proposals to reduce emissions for the public buildings sector?

Agree

Please provide your reasons and any alternatives::

Energy Management Strategy & Action Plan to 2030 & Energy Invest to Save Fund:

Progress towards the 30% reduction target by 2030 is slow, with a reduction of only 12% in carbon emissions by 2022. We recommend that local councils are included in future government energy efficiency schemes. Although they do not represent a large proportion of emissions in this sector, they have an important presence in communities and should be seen to be leading by example on energy efficiency.

Broadly speaking, there are four key barriers preventing retrofit of public sector buildings happening at the required rate and scale:

- a lack of capacity and expertise within public sector organisations to identify and implement projects
- access to finance (and a lack of capacity to unlock finance)
- long and complex procurement processes
- risks associated with investing money with long term paybacks and no savings guarantees.

We therefore recommend that the Invest to Save Fund is broadened to become a more holistic scheme which covers specialist advisory services (related to project appraisal and procurement of Energy Performance Contracts*) and the capital costs of energy upgrades. This scheme could be cross-sectoral, accepting applications from both public and private sector organisations, to reduce operational costs.

*Energy Performance Contracts (EPCs) are contracts where an Energy Service Company (ESCO) implements energy efficiency or renewable energy projects, and their payment is linked to the achieved energy cost savings, therefore de-risking the investment for the contracting authority.

2012 and 2022 Uplifts to Part F (Conservation of Fuel and Power) of the Building Regulations in Northern Ireland:

We support further uplifts to Part F, but the current implementation timeline is extremely slow. Many public authorities are already choosing to go beyond current building regulations, specifying higher standards such as BREEAM Excellent or Passivhaus for new public buildings. As public buildings constructed over the next two years will likely be in use for 25+ years, and retrofitting is significantly more expensive than building to higher energy performance standards in the first place, it is crucial that the government speeds up planned uplifts to building regulations to ensure Northern Ireland meets its net zero by 2050 target.

12 To what extent do you agree with the proposed approach to achieving a just transition in the public buildings sector?

Disagree

Please provide your reasons and any alternatives::

There has been little engagement with local authorities in the development of policies and proposals to decarbonise the public building stock. Given their influence at local level, it is important that they are adequately supported to decarbonise their estates, given many councils have old buildings that require specialist retrofit expertise.

Councils also have financial constraints hampering their ability to leverage new finance for improvements. Councils should be supported, starting with including local authority representatives in the NI Energy Management Strategy and Action Plan and implementation working groups to support exchange of best practice and drawdown of associated funding streams.

Relates to Chapter 6: Sector Policies and Proposals

13 To what extent do you agree with the proposed policies and proposals to reduce emissions for the waste sector?

Agree

Please provide your reasons and any alternatives::

Diverting Biodegradable Waste from Landfill:

We fully support the introduction of a policy that requires all businesses to present biodegradable waste for separate collection.

Achieve a 65% municipal waste recycling rate whilst reducing waste to landfill to no more than 10% by 2035:

The current approach to increasing recycling rates, which is largely focused on communicating the benefits of recycling to householders, may not be sufficient to achieve the next phase of recycling targets which are extremely challenging. As well as better recycling infrastructure and more kerbside sorting, Northern Ireland should consider incentive-based policies to encourage hard to engage groups to recycle.

Introduction of Mandatory Recycling for Commercial and Industrial Sector:

We fully support mandatory business recycling as it would help achieve the '70% by 2030' recycling requirement in the Climate Change (Northern Ireland) Act 2022.

Increasing Household Recycling:

We support approaches that aim to promote enhancements in the quality and quantity of recyclate to enable more local reprocessing, for example through a minimum service standard across all council areas, best practice guidance, and funding to improve collection systems. However, this will not be enough to meet Northern Ireland's challenging recycling targets. As previously mentioned, we support incentive based policies such as Pay As You Throw schemes (PAYT). Evidence from international examples shows that PAYT schemes can be extremely effective when accompanied by high profile awareness programmes and better recycling infrastructure. For example, cities such as San Francisco (77 per cent recycling rate) or the German town of Neustadt an der Weinstrasse (70 per cent) all use PAYT schemes. Local Authorities do not currently have the powers to introduce PAYT so this would need to be revisited by the UK government.

14 To what extent do you agree with the proposed approach to achieving a just transition in the waste sector?

Agree

Please provide your reasons and any alternatives::

Whilst retraining of the workforce and educating children and young people through the curriculum are welcome measures, proposals need to be developed to educate the broader adult population, particularly those from low income or minority ethnic backgrounds, who are less likely to practice sustainable behaviours. If stricter recycling rules are introduced, they must be implemented with equity in mind. For example, ensuring recycling information is accessible to all, ensuring fair enforcement, and providing additional support and infrastructure in low-income areas to avoid unintended harms (such as fly tipping) and ensure all communities benefit from the transition.

Relates to Chapter 6: Sector Policies and Proposals

15 To what extent do you agree with the proposed policies and proposals to reduce emissions for the agriculture sector?

Agree

Please provide your reasons and any alternatives::

We support measures which enable more sustainable levels of livestock in Northern Ireland by introducing incentives and targets to discourage any additional growth in livestock numbers alongside productivity and direct emission reduction measures (e.g. feed additives, manure management systems, alternative fertilisers, genetic improvement programmes etc). We support the provision of supplementary financial support to help sustain farm incomes in the short to medium term, to buffer the financial impact of these policies.

In the long term, we support government schemes that encourage farms to transition to alternative agricultural enterprises and techniques including agroforestry and tree planting, wetland restoration, agri-tourism, cover cropping, organic farming and conservation tillage under a 'public goods for public money' model. Additional specific proposals are outlined below.

Towards a National Agricultural Carbon Market:

Carbon could be 'farmed' as a commodity within a closed-loop economy for Northern Ireland entities only, to help achieve the agriculture sector's carbon targets. It could be regulation-driven or voluntary carbon markets. The approach, used by Brazil, focuses on capturing or reducing greenhouse gas emissions in ways that can be measured, verified, and monetised through carbon credits or government incentives. These methods would turn climate-friendly practices into income streams for farmers. If carbon reductions can be independently verified, these credits could provide a viable revenue source for farmers and reduce costs for the public sector. However, a long-term policy commitment from government would be necessary, as carbon farming often requires long-term changes in land management practices.

Anaerobic Digestion:

We are supportive of the use of anaerobic digestion plants to capture and recycle nutrients from the digestate that would otherwise be land spread and capture and use the methane that would otherwise go into the atmosphere. However, there could be a number of unintended harms from this policy if it is not well designed, that we are extremely concerned about. If AD systems are poorly sealed, fugitive methane emissions can be significant and can offset climate benefits. Studies from the U.S have shown actual emissions from biomethane supply chains can be significantly higher than reported and that biomethane is not as 'green' as it claims to be. To feed AD plants there may be an unintended incentive to increase livestock numbers to produce more slurry or grow dedicated energy crops like maize which would compete with food production for land. AD digestate spread as a fertiliser can contribute to ammonia emissions and water pollution if applied in excess or badly timed. Additionally, digestate can produce strong odours and AD plants can be noisy and become a nuisance for local residents.

Right tree, right place, right reason:

We'd like to see the CAP emphasise the need to plant native trees rather than non-native trees in the correct location, based on the UK Forestry Standard (UKFS).

16 To what extent do you agree with the proposed approach to achieving a just transition in the agriculture sector?

Agree

Please provide your reasons and any alternatives::

Ensuring a just transition in the agriculture sector means recognising that not all farmers are equally positioned to adapt to climate policies. The Northern Ireland Integrated Farm Survey highlights that small farms often have older age profiles who may be nearing the end of their working lives. These farms may face the greatest challenges in adapting either due to limited financial capacity, lower uptake of new technologies, or reduced incentive to make long-term changes. Special provisions may be required in these instances, whether through tailored support, flexible timelines, or financial assistance, to ensure they are not left behind in the transition. We look forward to further detail on the Just Transition Fund for Agriculture and will reserve comment on this policy until the details of this scheme are published.

Relates to Chapter 6: Sector Policies and Proposals

17 To what extent do you agree with the proposed policies and proposals to reduce emissions for the LULUCF sector?

Agree

Please provide your reasons and any alternatives::

Protecting Established Trees, Woodlands and Hedgerows:

Current legal protections for existing trees, ancient woodlands, and established hedgerows are insufficient. While Tree Preservation Orders (TPOs) provide some safeguards, they are limited in scope and effectiveness. It is an offence to wilfully damage or destroy a protected tree, or to carry out works without consent, but in practice convictions and fines are rare when trees without a TPO are destroyed.

Furthermore, the criteria for granting a TPO are outdated. Local Planning Authorities (LPAs) must currently demonstrate that a tree has “amenity value” before protection can be applied. This definition does not take account of the tree’s carbon sequestration capacity or its wider role in tackling climate change. In light of the Climate Change Act (2022), the criteria for tree protection should be revised to reflect both environmental and climate obligations.

A further loophole exists in the planning system. LPAs often grant planning consent even where trees have already been removed, reasoning that no further disturbance will occur. This creates a perverse incentive for developers to fell trees pre-emptively, before submitting a planning application, to reduce the risk of consent being denied. Although replacement planting may be required as a planning condition, this does not adequately replace the lost carbon storage or biodiversity value of mature trees. This underlines the urgent need for planning reform.

LPAs themselves frequently highlight the lack of legal clarity around environmental and climate protections in planning legislation. Many are reluctant to refuse applications on tree protection grounds for fear of legal challenge or of being perceived as economically uncompetitive compared to neighbouring authorities that take a less rigorous approach.

While the current review of the Strategic Planning Policy Statement (SPPS) is expected to strengthen climate considerations in planning policy, the Planning Act (Northern Ireland) 2011 should also be amended, as TPOs alone are neither sufficient nor universally applicable. Hedgerows face even weaker protection. Strengthening hedgerow protection must therefore be considered as part of a wider strategic review of planning and land use policy.

We urge that the proposed Land Use Policy recognises the critical role of planning legislation in delivering stronger legal protections for existing trees, woodlands, and hedgerows, ensuring they are preserved for their climate, biodiversity, and community value.

Creating new Woodlands:

Radical action will be needed in the LULUCF sector to reach net zero by 2050. Of the 1.4 million hectares of land in Northern Ireland, currently 1 million hectares is farmed. Northern Ireland is the only part of the UK without a national park. One radical proposal is for the Government to explore the acquisition of private land to create national parks, forests, and protected areas. These lands would then become publicly owned and managed for conservation, carbon sequestration, education and recreation.

18 To what extent do you agree with the proposed approach to achieving a just transition in the LULUCF sector?

Agree

Please provide your reasons and any alternatives::

We are broadly content with the proposed approach. We look forward to commenting on the just transition provisions in LULUCF policies and proposals which should incorporate relevant guidance from the Just Transition Commission.

Relates to Chapter 6: Sector Policies and Proposals

19 To what extent do you agree with the proposed policies and proposals to reduce emissions for the fisheries sector?

Strongly agree

Please provide your reasons and any alternatives::

We fully support initiatives that prepare for roll-out of electrification and low or zero emission fuels across the fishing fleet. R&D to drive innovation is essential for this challenging sector however it makes up a relatively small proportion (0.1%) of Northern Ireland’s total GHG emissions.

20 To what extent do you agree with the proposed approach to achieving a just transition in the fisheries sector?

Strongly agree

Please provide your reasons and any alternatives::

We are broadly content with the considerations outlined and look forward to reviewing the financial assistance and incentive schemes that will provide support to workers in the sector who may be negatively affected by climate policies. It is critical that government ensures collaboration with the fisheries sector to co-design decarbonisation policies that ensure no one is left behind or disadvantaged by the transition.

Relates to Chapter 7: Impact Assessments

21 To what extent do you agree with the key findings of the Financial, Social and Economic Impact Assessments that have been carried out on the policies and proposals within the draft Climate Action Plan?

Agree

Please provide your reasons and any comments on the findings::

The findings note there are short-term financial costs associated with implementing policies and proposals in the draft Climate Action Plan which are generally balanced by long-term financial gains. The co-benefits of climate action have been somewhat underplayed in this section; however we note climate benefits are discussed later in the document.

22 To what extent do you agree with the key findings of the overarching Financial, Social and Economic Impact Assessment of the draft Climate Action Plan?

Agree

Please provide your reasons and any comments on the findings::

The summary fails to frame climate action as cost avoidance, treating the short-term costs of climate action in isolation, without comparing them to the much higher economic, social, and environmental costs of climate inaction. Cost avoidance is critical to justifying upfront investment. Also, there is no mention of intergenerational equity, acknowledging that climate action today helps avoid passing greater costs and risks onto future generations.

23 To what extent do you agree with the key findings of the Equality Screening and Equality Impact Assessment?

Agree

Please provide your reasons and any comments on the findings::

We have no comments on the findings.

24 To what extent do you agree with the key findings of the Rural Needs Impact Assessments –that have been carried out on the policies and proposals in the draft Climate Action Plan?

Agree

Please provide your reasons and any comments on the findings::

There is very little detail on the findings of the RNIA. The summary frames the impact on rural communities as largely positive but this depends on policies being well-designed so that they deliver new green employment in rural areas, improved sustainable transport opportunities, opportunities for rural communities to own renewable energy projects and opportunities for more sustainable agriculture practices all of which could lead to better economic prospects for rural communities. Climate policies must be designed so that they support rather than disadvantage rural communities. We look forward to reviewing the details of these policy proposals to ensure they deliver the opportunities promised.

25 To what extent do you agree with the key findings of the overarching Rural Needs Impact Assessment of the draft Climate Action Plan?

Agree

Please provide your reasons and any comments on the findings::

We broadly agree with the findings of the overarching RNIA. We look forward to reviewing the mitigation measures mentioned to address adverse impacts on rural areas as part of the policies and proposals.

26 To what extent do you agree with the key findings of the Strategic Environmental Assessment?

Agree

Please provide your reasons and any comments on the findings::

We echo the last paragraph of the summary, in which the SEA recommends close monitoring of policies and proposals set out within the draft Climate Action Plan are closely monitored to ensure that negative or unforeseen effects can be effectively responded to and managed. As previously mentioned, we have serious concerns that the strong focus on natural gas and biomethane, and associated processing technologies, may lead to unintended environmental harms that will undermine the intended climate benefits. Mitigation measures should be included in these policies to prevent potential negative impacts from the outset.

27 To what extent do you agree with the key findings of the Habitats Regulations Assessment?

Neither agree nor disagree

Please provide your reasons and any comments on the findings::

Without further detail on the findings of this Assessment we are unable to provide comment.

28 To what extent do you agree with the key findings of the Regulatory Impact Assessment?

Agree

Please provide your reasons and any comments on the findings::

We agree the draft plan itself will not make any new regulations and therefore will not impose any costs, savings, additional compliance or administrative burdens on the wider business community.

29 To what extent do you agree with the key findings of the Child Rights Impact Assessment?

Agree

Please provide your reasons and any comments on the findings::

We agree there is likely to be a net benefit to children and young people from the draft Climate Action Plan as it will deliver a cleaner, healthier and more sustainable environment whilst providing opportunities for the economy and job creation.

30 Can you provide any further information which will help to supplement the completion of these impact assessments?

Please provide details, identifying the assessment(s) to which the information relates::

No

Relates to Chapter 8: The Natural Environment and Climate Change

31 To what extent do you agree with the proposed target for Soil Quality?

Disagree

Please provide your reasons and any alternatives::

We understand government is constrained in its ability to set targets for Soil Quality due to a lack of baseline data on soil health. We look forward to the development of indicators for soil health and the inclusion of meaningful targets on Soil Quality in the next iteration of the Climate Action Plan.

32 To what extent do you agree with the proposed target for Biodiversity?

Disagree

Please provide your reasons and any alternatives::

The proposed biodiversity target falls short of what is required. To align more closely with EU and global biodiversity frameworks, Northern Ireland needs to commit to the 30x30 target (30% of land and 30% of oceans to be conserved by 2030). The target must strengthen the clarity of conservation condition goals (i.e. refer to actual favourable condition rather than approaching favourable condition) and include strict biodiversity protection measures.

33 To what extent do you agree with the proposed target for Air Quality?

Disagree

Please provide your reasons and any alternatives::

Whilst introducing regulations to meet WHO Interim Target 4 (10 µg/m³ for PM2.5 and 20 µg/m³ for PM10) is an improvement over existing standards, however, it should only be seen as a stepping stone toward full alignment with WHO 2021 guidelines. The WHO sets the guideline of 5 µg/m³ for PM2.5 because no level of exposure to PM2.5 is considered safe. We expect full alignment with current UK and EU ambitions; therefore the final goal should be 5 µg/m³ and 15 µg/m³ targets for PM2.5 and PM10 respectively.

Relates to Chapter 8: The Natural Environment and Climate Change

34 Can you provide any further information which will help us to incorporate Nature-based Solutions into our policies and proposals?

Yes

If yes, please provide details::

Sustainable NI has developed a climate screening tool for projects and plans in local authorities which acts as a 'stop, think, consider' checklist for a wide range of measures, including nature-based solutions. It is based on the concept of donut economics. This tool could be adapted for government policy and decision making to fulfil this legal requirement.

Relates to Chapter 9: Governance for Delivery

35 To what extent do you agree with the proposed governance arrangements to support the delivery of the Climate Action Plan?

Disagree

Please provide your reasons and any alternatives::

Oversight:

We broadly agree with the proposed governance arrangements, but we think one key part is fundamentally wrong: separating Climate Action from Green Growth. This has led to two very similar Programme Boards - one for Green Growth and one for Climate Action Plan delivery. While Green Growth focuses more on the economic opportunities of climate action, in practice, many of the same projects and actions will fall under both programmes. Having two separate boards adds extra work and complexity that could be avoided. It would make more sense to combine them into a single programme, as is already done in other countries. Our suggestion is to bring climate, economic, and just transition (social) dimensions together into a single Climate & Sustainability Programme, merging two programme boards into one.

Just Transition Commission:

Ideally the Just Transition Commission would have been established in time to work with and advise departments to inform the development of the draft Climate Action Plan to ensure that proposals, policies, strategies and plans comply with the just transition principle. Instead, it will only be able to provide an oversight review of the first Climate Action Plan rather than actively shape its development.

NI Climate Commissioner:

We are concerned that the role of the NI Climate Commissioner and UK CCC will overlap. This relationship will have to be carefully managed to ensure the Climate Commissioner adds value beyond the existing functions of the CCC.

Relates to Chapter 10: Monitoring and Reporting

36 To what extent do you agree with the proposed approach to monitoring and reporting on policies and proposals?

Strongly agree

Please provide your reasons and any alternatives::

We agree with the proposed monitoring and reporting approach and have no comments to add.

Relates to Chapter 11: Public Sector Leading by Example

37 Do you have suggestions about other actions that we should be taking across the public sector?

Yes

If yes, please provide details::

The Committee on Climate Change (CCC) report on 'Local Authorities and the Sixth Carbon Budget' states that local councils have powers or influence over roughly a third of emissions in their local areas. This means therefore that collectively the eleven councils have powers or influence over a third of emissions across all sectors in Northern Ireland. This is significant, yet there are few provisions in the draft Climate Action Plan to enable and support a coordinated approach to local government climate action.

Local Planning:

There is a lack of ambition across the Local Development Plans (LDPs) prepared by councils. Councils are reluctant to use their planning powers to require higher development standards above what is required by building regulations as it could create an economic disadvantage if other local authorities have less stringent rules. A revised Strategic Planning Policy Statement should be issued and a review of planning legislation should be undertaken to address this issue and accelerate local authority action in this area.

The national planning framework could set minimum standards and requirements for local authorities in relation to sustainable residential development, new renewable energy generation and nature-based solutions. These standards could be further elaborated in climate change guidelines for planning authorities. Furthermore, building one-off houses in the open countryside (a practice which is commonplace across Northern Ireland) is not compatible with sustainable development and climate objectives. The revised national planning framework will need to address this and work towards improved housing density standards.

Local Government Co-ordination:

In its report 'Local Authorities and the Sixth Carbon Budget' the CCC recommend four key things to achieve collaborative delivery with local government:

- Framework: An agreed framework for delivery for Net Zero incorporating local and national climate action
- Financing: Appropriate long-term financing to support local authorities in delivering Net Zero
- Flexibility: Local operational flexibility around how local areas address climate change
- Facilitation: coherent policy and powers for the facilitation of delivery.

Practical ways that government and local authorities can work more seamlessly together:

- Link council and departmental climate units or climate coordinators up to share tools, ideas and collaborate, for example by extending the membership of existing forums such as the NI Sustainable Development Forum
- Extend the NICS staff training system (LinKS), known as 'Climate Smart for Civil Service', to Local Authorities
- Provide significantly more support that is currently available for public body reporting compliance including tools, further guidance, and a training programme tailored to the needs of local authorities including dedicated support to calculate scope 3 emissions.

Relates to Chapter 12: Enabling the Transition to Net Zero

38 To what extent do you agree with the actions that we are taking to enable the transition to Net Zero?

Agree

Please provide your reasons and any alternatives::

Science and Innovation:

P237 of the Climate Action Plan Consultation references the 2022 Matrix Report 'NI's Future Hydrogen Demand and Capability' highlighting 'it suggests Northern Ireland can be at the forefront of developing a hydrogen economy to heat our homes, fuel our transport and power our industry.' However, contrary to what the draft Climate Action Plan states, the report does not recommend hydrogen for home heating, stating on two separate pages that 'the role of hydrogen in heating buildings is less certain'. This is an important distinction. Government policy should not over emphasise the role of hydrogen in home heating if there is still scientific uncertainty on this, as it could send the wrong signal to the market. (Note: Use of hydrogen for heating is uncertain because converting electricity to hydrogen to then convert it back to heat is less efficient than converting electricity directly to heat in the first place. It only makes sense to do this in instances where electric forms of heating are not feasible or in a situation where renewable electricity is extremely cheap and widely available).

Behaviour Change and Communication:

There is a need for a national public awareness campaign for behaviour change for climate action that targets the adult population in Northern Ireland in the same way that previous high-profile campaigns led by other departments have led to widespread change, for example, the Executive's Coronavirus public information campaign, DfI Road Safety Campaigns, the Department of Justice's Ending the Harm campaign to highlight organised crime and paramilitary activity and the Health and Safety Executive campaigns "Stop and Think SAFE" targeting farm safety. As climate action is a cross-cutting executive level strategic issue, communication budgets from all departments could be pooled to increase resourcing and impact. As awareness campaigns and information are insufficient to bring about major change alone; they should be closely linked with other levers, including regulations, fiscal incentives and disincentives, and the development of green infrastructure. Ultimately sustainable behaviours must be comparatively cheaper and easier than unsustainable behaviours, in order to create lasting change.

Relates to Chapter 13: Investing in Climate Action

39 To what extent do you agree with the assessment of the costs of implementing this Climate Action Plan?

Strongly agree

Please provide your reasons and any alternatives::

Government spending:

The costs are set out in gross terms, i.e. government expenditure, rather than net costs. We would like to see the CAP investment costs set out as net costs and also as a % of GDP to understand if planned government investment commitments align with the level of investment recommended by the Committee on Climate Change.

Leveraging private sector investment for nature and nature-based solutions:

We would highlight a relatively new legal requirement in England for new developments to deliver a 10% net gain in biodiversity either on-site, off-site, or by purchasing biodiversity credits. The policy has sparked a growing market in private biodiversity units and habitat banks, where landowners and conservation groups create and sell habitat improvements to developers, helping leverage private sector investment for nature and nature-based solutions. This could be a statutory requirement in the national planning policy framework in Northern Ireland.

40 Do you have any other information to inform this cost assessment?

No

If yes, please provide details::

Relates to Chapter 13: Investing in Climate Action

41 To what extent do you agree with the proposed approach to establishing a Just Transition Fund for Agriculture?

Agree

Please provide your reasons and any alternatives::

We look forward to seeing the future Just Transition Fund for Agriculture. We support the shift to sustainable farming, but policies to reduce emissions in farming should be introduced gradually. It will take years, and in some cases decades, for farm management practices to change. If farmers are pushed to make too many changes too quickly, or if they feel unfairly impacted by the transition, it could lead to public opposition. While many farmers will be open to change, others may be hesitant to make large investments or significant changes to how they farm. This needs to be reflected in the support, compensation, and timelines for implementing these changes.