

Discussion Document on a Northern Ireland Climate Change Bill

Final Submission – Sustainable Northern Ireland

Introduction

Sustainable Northern Ireland is a charity that works with Northern Ireland’s public sector to inspire, influence and inform action on sustainability and climate change. Through our network, we support and empower public sector collaboration to accelerate action on climate change and deliver a sustainable future for all.

Sustainable Northern Ireland’s vision is set out in our Strategic Plan – Time for Change, namely:

“A world where prosperity is achieved in ways that are good for people and the planet”.

Delivering for local government and public bodies is the cornerstone of our approach. We do this through a programme of capacity building, communications, campaigns and events focused on key themes and offering opportunities for peer-to-peer support, learning and coordination.

Sustainable Northern Ireland welcomes the opportunity to engage with DAERA on the development of a Northern Ireland Climate Change Bill. We welcome the positive and proactive approach of DAERA in seeking to ensure that Northern Ireland fulfils the requirements of the NDNA agreement for the development of climate change legislation and targets for reducing carbon emissions in line with the Paris Climate Change Accord.

Summary response

Sustainable Northern Ireland is supportive of the direction of travel set out in the Discussion Document. The Bill represents a positive step forward for Northern Ireland which will help provide a long-term vision to guide detailed climate change policymaking over the coming decades. We recognise taking forward the vision for a low-carbon, resilient and sustainable society is a shared endeavour between the Northern Ireland Executive, the public, private, third sectors and communities across Northern Ireland.

We support legislation that sets ambitious and stretching decarbonisation targets for Northern Ireland in line with the rest of the UK. Strong early action is the most effective strategy in halting climate change and economic studies have shown the benefits of early action on climate change significantly outweigh the costs (Stern Report, 2008).

The World Economic Forum ranks climate change as the biggest risk facing the global economy. When managing any risk, a balanced appraisal of wellbeing (i.e., the social, environmental and economic costs versus benefits) should be used in deciding an appropriate mitigation strategy. Decision makers must keep in mind the economic and social burden of climate change and ensure the needs of this generation aren’t put ahead of the needs of future generations, which would be considered unjust. It is equally important that economic needs aren’t prioritised over social and environmental needs, which would be considered unsustainable.

Northern Ireland has a moral responsibility to match the national effort against climate change. Net-zero carbon is technically feasible but will be highly challenging and will require sustained policy interventions across several sectors, in particular agriculture, which will be complex, costly and time-consuming but necessary given the much greater economic and social toll that will be brought about by climate change. Setting an ambitious target of net zero carbon by 2050 is, we argue, **in the national interest**.

Net-zero carbon will require a significant reduction in livestock numbers alongside a shift towards more sustainable forms of farming and a shift in consumer behaviour to eat less but higher quality meat. This is not an easy choice, but it is a necessary one. Farming as an industry requires transformational change to improve its economic viability and environmental impact. Additionally, with global warming expected to bring more extreme weather to Northern Ireland, farming models will need to adapt to emerging climatic conditions and embrace non-conventional types of farming in order to remain competitive.

Whilst there is a need to produce enough food for a growing global population, **meat and dairy is the least sustainable method of feeding people**. Scientists have reported that without meat and dairy consumption, global farmland use could be reduced by more than 75% - and still feed the world¹. Additionally, public health research has shown that high levels of red meat consumption is a contributing factor to disease, and public health bodies worldwide – including the NHS – urge people limit their intake of red and processed meat to reduce risk of cancer.

As custodians of the land, farmers can be part of the solution to climate change and should be involved in the design of policy solutions. Policy makers should be engaging with farmers directly, cognisant of the fact that bodies funded by the agri-industry have a commercial interest in growth-based policies.

The green transition will present new economic opportunities for all economic sectors, including farming, that can offset any necessary reduction in livestock production. Diversification into cleaner, greener, more resilient farming enterprises is entirely possible within a 30-year time horizon, with the right policy direction and support. The meat and dairy industry should not disappear, but livestock production should level off and eventually decline, becoming part of **a more diverse mix of agricultural services** in Northern Ireland, with any remaining livestock emissions offset by carbon ‘sinks’.

Given that the scientific and economic evidence is overwhelmingly in favour of a net-zero transition as soon as possible, we recommend legislation committing Northern Ireland to reduce greenhouse gas emissions to **net-zero by 2050** in line with the Paris Agreement.

Other views in consultation response:-

- We recommend the overall objective of the Bill should be the establishment in Northern Ireland of a net-zero carbon, climate resilient and sustainable economy by the year 2050
- We do not support a dual approach involving separate emissions targets for long- and short-lived pollutants
- We are supportive of the establishment of interim carbon emission reduction targets and carbon budgets

¹ <https://josephpoore.com/Science%20360%206392%20987%20-%20Accepted%20Manuscript.pdf>

- We recommend provision in the legislation for a Public Body Climate Change Duty and reporting framework, applicable to all Public Bodies, which includes climate change adaptation, mitigation and other aspects of environmental sustainability
- We are supportive of an independent Northern Ireland oversight and scrutiny body on climate change as well as a consultative citizens' assembly on climate change
- We consider it important that any criteria developed to establish greenhouse gas emission reduction targets are informed by 'just transition' principles to ensure climate justice
- We suggest provision in the legislation for a Climate Action Plan which documents all climate action measures and interventions (mitigation and adaptation) across government departments
- We suggest the legislation includes a duty to consider impacts on biodiversity in setting emission reduction targets, and contains provisions to prioritise nature-based solutions where relevant and appropriate
- We recommend the amalgamation of energy and climate policy into a single government department to increase efficiency and co-ordinate climate change delivery

Detailed response

Determination of Targets

Question 1: Which of the following high-level options do you think is appropriate for Northern Ireland to take forward?

Option 1: Northern Ireland Climate Change Bill setting interim emission reduction targets and a long-term target of net zero emissions in Northern Ireland by 2050 (long term target does not consider expert climate change advice).

Option 2: Northern Ireland Climate Change Bill setting interim emission reduction targets and a long-term target for Northern Ireland by 2050, the long-term target is an equitable contribution to achieving UK-wide Net Zero by 2050 (long term target considers expert climate change advice).

Option 1. It is important that Northern Ireland plays its part in helping to roll back the effects of climate change and sets an ambitious target for carbon neutrality, given that Northern Ireland has contributed the least to UK carbon reduction efforts to date.

It is imperative that Northern Ireland's contribution to climate change ends definitively within a generation. We therefore support legislation committing Northern Ireland to becoming a net-zero society by 2050 in line with the Paris Agreement target to limit global warming to well below 2°C and pursue efforts to limit it to 1.5°C. According to an IPCC scientific report on global warming from 2018, global emissions should reach net-zero by 2050 if the 1.5 °C target is to be met. Northern Ireland must rise to the challenge and set targets based not on what it can achieve but what it should achieve.

Given that the EU is developing an overarching policy objective of climate neutrality by 2050, and the UK Climate Change Act has set a similar target, Northern Ireland would not be on a par with either the current EU or UK climate targets, if it pursued Option 2.

The proposed Climate Change Bill must demonstrate leadership on climate action. At present, Northern Ireland has reduced its emissions by around 20 per cent since 1990 – this is the lowest contribution out of all four nations of the United Kingdom due in part to a lack of legislation and regulation on climate change, and the pursuance of government policies not conducive to climate protection, for example, the Going for Growth Strategy.

The next phase of Northern Ireland’s journey to net-zero emissions will, undoubtedly, require different, and in many cases much more difficult choices than has been the case to date but it is clear that people across Northern Ireland want to see action. An opinion poll carried out by RSPB NI showed that 74% of people are in favour of a Climate Change Act. While there may be some uncertainty over the precise route that can be taken, we believe it is right to be as ambitious as possible to drive the action required to make the changes we need.

We disagree with the premise of the question which implies that a long-term net-zero target does not consider expert climate change advice. We note the Committee on Climate Change report recommends ‘a target to reduce all GHGs by at least 82% by 2050’ and that this is an advisory target. The guidance does not seek to limit Northern Ireland’s ambition on climate change, it is simply advice on what would be equitable and achievable. The letter from Lord Deben, Chair of the Committee on Climate Change goes on to say:

“There is no purely technical reason why net zero is not possible for Northern Ireland...getting to net zero in Northern Ireland would require a substantial reduction in output from Northern Ireland’s livestock farming sector”

This means Option 1 is not outside of Northern Ireland’s capabilities, but would require a substantive change in agri-food policy, which historically has promoted exponential growth in agricultural output which has led to an acute ammonia problem in Northern Ireland. Ammonia pollution has major implications not only for biodiversity, but it has also been directly linked to our poor air and water quality - and therefore is detrimental to human health.

In ‘Lay of the Land - the RSA Food, Farming and Countryside Northern Ireland Report² commissioners outlined the need for a **complete transformation** in our food and farming system in order to respond to the climate emergency and restore biodiversity, improve the public’s health and wellbeing. We believe a holistic approach should be taken when considering what would be an appropriate greenhouse gas reduction target for Northern Ireland, in other words putting environmental and social concerns on a par with economic arguments. The proposed timescales are considered long enough to ensure farmers can transition onto a more economically, socially and environmentally advantageous trajectory long term.

² <https://www.thersa.org/reports/lay-of-the-land>

By selecting Option 2, there is a heightened risk of delayed action to reduce agricultural emissions, which would not be serving the best interests of current or future generations and would therefore not be in the national interest.

Question 2: Do you have any opinions on what would be the most important criteria to be considered when setting or updating long term and interim emission reduction targets?

Sustainable Northern Ireland considers it important that any criteria developed to establish greenhouse gas emission reduction targets are aligned to sustainable development objectives and informed by ‘just transition’ principles to ensure climate justice. This means that any overarching climate targets and measures implemented in support of these must also:

- (a) support jobs and growth of jobs that are climate resilient and environmentally and socially sustainable;
- (b) support net-zero carbon investment and infrastructure;
- (c) create work which is high-value, fair and sustainable;
- (d) reduce inequality as far as possible;
- (e) reduce, with a view to eliminating, poverty and social deprivation;
- (f) achieve the proposals set out in plans within the timeframe that is specified in the plans.

Elements of a Climate Change Bill

Question 3. Do you think flexibility should be built into the Bill, to allow consideration of new emerging evidence and science on climate change (such as for example on long lived and short-lived pollutants) when setting emission reduction targets?

Climate change policy, and any targets set within it, needs to be informed by and take into consideration the best available and most up to date climate change science. The science on climate change is constantly evolving, therefore we would consider it prudent that the Bill incorporates the necessary flexibility to allow consideration of emerging evidence around, for example, changes in the rate of global warming and any new or revised targets at international and national level.

Sustainable Northern Ireland would advise against a dual approach involving separate emissions targets for long- and short-lived pollutants, because it may be incorrectly interpreted as a ‘free pass’ for methane and other agricultural emissions, further delaying what is considered to be overdue change in this sector – effectively kicking the can down the road.

Question 4. Do you agree that a Northern Ireland Climate Change Bill should include a duty for 5 yearly carbon budgets to set a statutory cap (interim emission reduction targets) on total greenhouse gases that can be emitted in Northern Ireland?

Yes, we agree that statutory carbon budget caps should be set on GHG emissions as a means of setting interim GHG emission reduction targets. We also agree that these should be informed by independent expert advice which would take into account a number of factors such as latest climate change scientific evidence and relevant international developments, as well as socio-economic factors unique to Northern Ireland.

This should be done by an independent Northern Ireland climate change advisory body on consideration of available evidence from other relevant bodies, which would include:

- (a) the Intergovernmental Panel on Climate Change;
- (b) the United Kingdom Committee on Climate Change; and
- (c) the Republic of Ireland Climate Advisory Council.

Reporting Powers & Duties

Question 5. Should provision for reporting on adaptation measures by ‘major player’ public bodies be included in a Northern Ireland Climate Change Bill?

Yes. There must be provision for a Public Body Climate Change Duty within the Bill that makes it mandatory for public bodies to report on their contribution to the delivery of mitigation targets, delivery of programmes for adaptation and sustainability. This ensures that organisations undertake the exercise to report and that there is appropriate allocation of resources to support delivery. However, the reporting framework should not become an unnecessary regulatory burden. Reporting methods should be commensurate with the organisation’s size and capacity, and not detract from delivery. Adequate support and training should be provided to ensure organisations in scope can fulfil their statutory reporting requirements.

We recommend the Duty be extended beyond ‘major players’ to reflect the call for strong public sector leadership on climate action. We recommend the proposed reporting duty apply to all “Northern Ireland public bodies” meaning a body to which the following statutory provisions apply:

- articles 8 and 9 of the Audit (Northern Ireland) Order 1987 (No. 460 (N.I. 5)); and
- article 5 of the Audit and Accountability (Northern Ireland) Order 2003 (No. 418 (N.I. 5)).

We would welcome a commitment to a version of these duties also being extended to organisations that fulfil public services such as Housing Associations and Arm’s-Length Bodies (ALBs).

Question 6. Should provision for reporting on mitigation measures by ‘major player’ public bodies be included in a Northern Ireland Climate Change Bill?

Yes. We recommend the Duty be extended to all Public Bodies and organisations that fulfil public services. The public sector, and in particular local government, is in a leading position to demonstrate carbon emission reductions through their activities and behaviour as an example of best practice to residents and local businesses. By calculating their own emissions and making in-house reductions, in addition to increasing awareness and supporting local businesses and residents, carbon emissions can be reduced across each local authority area and therefore across the Region as a whole, meeting the government's climate change targets.

In addition to annual Public Body Climate Change Reporting described above, we recommend the introduction of three National Indicators for local councils within the Programme for Government’s Performance Reporting Framework:

- a) Percentage CO₂ reduction from local authority operations

- b) Per Capita CO2 emissions in the local area
- c) Planning to Adapt to Climate Change

Independent Advisory Body

Question 7. In addition to continuing to avail of the expertise of the UK Climate Change Committee, should we also include provision in the Bill, for an independent Northern Ireland advisory body on climate change?

Yes, an independent oversight and scrutiny body is necessary. Northern Ireland is unique to other jurisdictions due to its greenhouse gas emission profile and shared land border with the Republic of Ireland. On this basis special consideration must be given to fiscal, economic and social circumstances specific to Northern Ireland, as well as the transboundary element of carbon and current North/South governance arrangements, such as the Integrated Single Electricity Market.

It is therefore recommended there is provision in primary legislation for the establishment and powers of an independent body to provide advice and scrutiny over progress towards the achievement of Northern Ireland's climate change objectives. It is envisaged this will take the form of annual reports and periodic reviews by independent experts providing:

- oversight of delivery against climate change targets, including by public bodies;
- recommendations as to amendments to current policy considered necessary and desirable in order to ensure the achievement of climate objectives;
- oversight of just transition measures put in place to ensure that livelihoods of workers and of communities are protected and social equity is enhanced.

Due to the transboundary elements of carbon, the Northern Ireland independent body may consider recommendations and advice from all relevant bodies, which includes the the United Kingdom Climate Change Committee and the Republic of Ireland Climate Change Advisory Council.

In addition to an independent scrutiny body, we recommend that a consultative citizens' assembly is established in relation to climate change; in order to validate advice from relevant bodies and guarantee climate protections for the people of Northern Ireland.

Question 8. Do you have any other comments in respect of the issues raised in this discussion document?

Scope

The overall objective, set out in the Bill, should be the establishment in Northern Ireland of a net-zero carbon, climate resilient and sustainable economy by the year 2050. The Bill should cover climate change mitigation and adaptation elements.

Question 9. Are there any important issues you feel have not been adequately covered at this early discussion stage?

Climate Action Plan

The Bill should mandate the Executive to lay before the Assembly a Plan, equivalent to a Climate Action Plan, within a specified and limited time period, to achieve the overarching climate objective. This is considered essential in ensuring a co-ordinated approach to addressing the climate emergency and would centralise climate related targets and measures across all Executive strategies and plans. The Government's Climate Change Strategy / Plan should have executive weighting over all new and existing government strategies and plans. We would also welcome alignment of the United Nations Sustainable Development Goals across future climate change plans and policies.

Co-ordination

We call for the integration of energy and climate policy, which currently spans 5 or more government departments. We recommend the establishment of a single department for energy and climate change, as is the case in Scotland, England and the Republic of Ireland. A recent review³ by the University of Exeter argued for the creation of a single department – the Department for Climate and Energy Transition – with academics adding “this would simplify the currently complex energy decision making and encourage leadership”. This consolidation of policy would help increase efficiency and co-ordinate climate change delivery across the Northern Ireland government.

Resourcing

In order to achieve the ambitious targets in the Climate Change Bill, action will need to increase immediately across every sector of Northern Ireland. Adequate resourcing will be required for statutory bodies, businesses and communities to deliver on these ambitious targets.

The role played by local authorities, community groups, schools and individuals in driving change should not be underestimated. While acknowledging the essential role of strong policies and frameworks, and investment in green infrastructure, we call for a greater emphasis to be put on empowering people to take action on climate change. Dedicated funds, such as the Climate Challenge Fund in Scotland, will be essential in this regard.

Comments provided by:



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³ <https://www.irishnews.com/news/northernirelandnews/2020/11/02/news/leaked-report-highlights-lack-of-coherence-and-party-political-influence-in-development-of-stormont-energy-policy-2116069/>