

Draft Green Growth Strategy for Northern Ireland

CONSULTATION RESPONSE

19 November 2021

Introduction

Sustainable Northern Ireland 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 welcomes the opportunity to respond to the Department for Agriculture, Environment and Rural Affairs (DAERA) consultation and is looking forward to working with DAERA on its delivery.

Response

Section 1

Q1 Is our Vision 2050 the right vision? If not, what would you change?

Yes. SNI wish to raise few points that we would like to see in the strategy as key priorities.

The roadmap to reduce emissions has just started and since NI does not have a climate legislation yet - Bill (n.2), currently under review, does not include ambitious targets to net zero - we think this is the perfect time to reinforce the commitment of the Executive to consider the climate and nature crisis as emergency and red code for humanity.

Proving a strong Government's commitment would be attractive to investors in renewables and new technologies to promote sustainability; this will provide security for a growing green economy where ambitious targets are set by short, medium, and long-term steps. The Strategy should list these steps. The Strategy should specify the vision for 2050 of a net-zero society rather than a 'low emission' society, with clear targets to address and resolve the climate and nature emergency, which would acknowledge that the Executive recognise the actual state of emergency we are experiencing.

We aim to see a more aggressive Green Agenda where a trajectory line based on Carbon reduction's targets is parallel to the money line with (a) specific emission cuts addressed every year and (b) a list of the biggest emission sources. These last ones will need to be added to both budgets, carbon and financial, to highlight where cuts must be applied.

SNI suggest also to include in the Vision 2050, the possibility of an independent sustainability and environment advisory body responsible for calculating the CO2 budget, with the DofE making the implementations and creating the financial budget parallel to the CO2 one.

Procurement must be at the top of decisions. We wish to see in this Vision 2050 a commitment to Public Contracts only signed when there is a proved compliance to zero-emissions regulations.

Cities need more powers to drive economic growth and improve governance. The Executive should include in its Green Growth Vision 2050 a transformative process where Councils in Northern Ireland have broader powers and bigger budgets and where economic and infrastructure decisions are taken more at local level. As clearly stated in the [Empowering Belfast Report](#), combined metropolitan authorities, some with and some without a directly elected mayor, have been created with the clear raison d'être of delivering large scale job creation, economic growth, regeneration, and infrastructure investment, separated from the more social side of delivery that Councils do, and it seem to be working well across Great Britain, as well as worldwide.

Q2 Are our Green Growth principles right? If not, what should be included /taken out and why?

The Green Growth principles are right, but they are too vague, and the descriptions are weak.

Decarbonise states: "replace fossil fuels with renewable energy". As this is a document that sets out the long-term steps for the development of a green economy in Northern Ireland, there will

need to be a broader transition to green technologies and sustainable systems of capital and revenue investments. We suggest a re-wording of this principle to reflect this point e.g., “invest in renewable energy and green technologies to replace fossil fuel-based activities” as it gives investors and innovators in the private sector confidence to finance and develop a range of low carbon solutions to support the transition.

Share responsibility – it would be significant add to the definition as follows “a just transition to a low carbon **and low emissions**, nature rich society”. Air pollutants like ammonia (NH₃) from agriculture are not greenhouse gases, but they do negatively impact on human and animal health while also damaging ecosystems. We recommend inclusion of ammonia emissions from livestock in this statement, as it presents a major challenge for Northern Ireland’s agricultural industry, and the achievement of a green economy generally. As NI is the major contributor to the UK agricultural economy, and produces above average ammonia emissions relative to its population, Government must demonstrate a strong commitment to the UK’s commitments under the International Gothenburg Protocol and the National Emissions Ceiling Regulations (2018) to reduce ammonia emissions by 16% by 2030 (source: [AFBI, Feb 2021](#))

The principles for developing a green economy in NI are set, as stated in the document (page 26), on the guidance for opportunities to create a ‘Greener and sustainable economy’ as suggested in the UK Government’s 10 Point Plan for a Green Industrial Revolution and the 10x Economy vision of the NI Department for Economy.

SNI would like to suggest including a principle on capitalising on green industrial opportunities created by the transition, through the development of solutions in NI reducing reliance on importing technologies from abroad. This suggestion comes from the lack of mention, in the UK Government’s 10 Point Plan, to investments in geothermal and tidal energy that are currently being trialled successfully and produced in small scale in the UK. In the Green Growth Strategy for NI, SNI would like to see a plan to eliminate the risk of small or no investments in new green technologies, being concerned that as ambitions rump up, foreign companies will be first in line to benefit, while homegrown businesses miss out, as it has already happened in GB with offshore wind farms. Most of the windmills still waiting to be installed, are produced in China and the major holdings are big multinational corporations of oil like Total. The GMB trade union has warned that the UK risks to waste a major economic benefit by allowing many of the components of its offshore wind boom to be manufactured in the factories and steel mills of Asia. To support local green jobs in a thriving green economy, better than green growth (which is a paradox itself), investment in research and manufacturing must happen in NI, in collaboration with the rest of the UK and Ireland.

Section 2

Q3. Are we right to adopt a Green Growth approach bringing together green jobs, climate action and the environment?

Yes, we agree with the broad alignment of these policy priorities however disagree with the title and framing of the strategy, which places growth as a central driver of the agenda. The overarching objective should be achieving Net Zero, to avert dangerous levels of climate change, whilst supporting economic prosperity. We believe a more fitting title would be: ‘Net Zero Strategy for Northern Ireland: Building a Green Economy’, allowing space for green jobs in the transition towards renewables and more sustainable systems of production – which may in some sectors require de-growth in order to become more viable long-term.

A Green Economy is about improving human wellbeing and building social equity whilst reducing environmental degradation ([Nature-based Solutions and the Green Economy](#)). Exponential economic growth implies the unrestricted use of environmental resources centred on conventional measures of growth (GDP), without considering the need to decouple growth from resource use, and move to a circular, regenerative economic model. Historically the use of more efficient systems of production has resulted in an increase in demand due to increased supply and reduced costs, which means more resources are necessary to sustain the levels of wealth already reached. This means that unintentionally improvements in efficiency could lead to increased consumption, which would undermine attempts to green the economy. We would encourage the Strategy to recognise that there are alternative ways of supporting prosperity which do not require endless growth in GDP. “More attention should be given to conceptualisations of economy that do not rely on economic growth as the key route towards ecological sustainability and human wellbeing.” (Source: [BIOS Research Institute](#)). We support the model that has been adopted by the Government of New Zealand which

measures economic success in terms of citizen wellbeing, instead of GDP as it does not accurately indicate economic prosperity.

Q4. Is a statutory Green Growth test needed to ensure we put climate action, environment and green jobs at the heart of policy development?

Yes, a test to measure the impacts of policies, in particular capital projects and programmes, to evaluate and prioritise investments and initiatives based on their sustainability, will in the long run provide a more advantageous return of investment, prevent carbon lock-in and reduce the risk of stranded assets. Nevertheless, SNI would suggest naming the measuring system 'Climate and Sustainability Test or Assessment', which will include elements of 'Just Transition' as per the [National Development Plan for Ireland](#) (page 33).

Q5. Should Green Growth be one of our top Executive investment and budgetary priorities?

Yes. SNI suggest that the Executive should prioritise Green Growth providing in the strategy methods, or a mention to that, of monitoring the distribution and allocation of investments alongside sectors' carbon emissions. A model that the Executive could adopt is the Climate Budget developed by Oslo, Denmark, in 2017. It shifts the focus from the long-term vision to a shorter term in order to reach the long-term targets. The Climate Budget was created to ensure that the city implements actions to match its ambitions. The way to do it is by allocating CO2 cuts to relevant sectors. It is the Finance Department managing the budget, and only spending plans with a realistic chance of delivering a reduction in GHG emissions are approved. This means climate goals are at the centre of the entire financial budgeting process. As the European Green Deal and the Asian Development Bank state, it is important that the Government invests now in projects and infrastructure such as offshore wind, geothermal, blue carbon and [community-based tourism](#), to guarantee accelerated transition to a green economy. Investing now will maximise the economic opportunities of the green economy through innovation, jobs, and skills in a way that is fair and just for all of society.

Section 3

Q6. Do we need specific targets for each sector set out in Climate Action Plans? If yes, how would this be brought about; and if no, how should we ensure we drive change?

Yes, it is important to set specific targets for each sector since their transition to net-zero will happen at different rates. They also ensure the burden of decarbonisation is fairly distributed across all economic sectors. Specific targets for each sector should be set at a frequency that allows for effective monitoring and data gathering, so the appropriate investment is guaranteed. The priority ranking for assets in each sector will play a key role in this process. Such a procedure will keep track of progress and economic benefits of climate action locally and nationally. It is necessary that the Government as first step, commissions an independent economic assessment of the costs and benefits of decarbonisation to Northern Ireland, to give policymakers assurance that moving towards a Net-Zero is good for the economy overall. This is the decisive decade of action, and non-linear cuts are essential along with decarbonisation, which must be front loaded with majority of action at early stage. SNI suggest factoring this into the carbon budget and the most appropriate calculation of it, without excluding from the strategy the short-term milestones pivotal to a 2050 Vision. SNI wish to see in the final version of the NI Green Growth Strategy tangible targets of economic indicators such as X number of green job ambitions for NI, and not only as a share of the 250,000 jobs mentioned in the UK Government's 10 Point Plan. The International Labour Organization (ILO) suggests that the transition will have a positive impact on overall employment. They estimate that actions to limit global warming could create 24 million jobs across the global energy sector by 2030, with the loss of around 6 million jobs in carbon-intensive sectors—or four green jobs created for every brown job lost (Source: [Green Growth Opportunities for the UK](#))

The Executive must show commitment to support a just transition in each sector and this can be done by creating a Climate Budget where investment in new skills will play a crucial role in enabling the net zero transition. The evidence indicates that skills need for green economy jobs will vary across sectors and roles.

Q7. Do you agree on the definition of the sectors?

Yes. The alignment with Committee on Climate Change (CCC) sectors seems the most appropriate mechanism. Although the CCC has not recommended that sectoral targets be set in law, the NI Executive should propose to legislate for sectoral targets to ensure that emissions targets are reached through legally binding carbon and nitrogen budgets. The Department's Climate Change Bill places an obligation on the Government to prepare policies to ensure the carbon budget is met, but if we want to reach either 82% reduction in GHG emissions or Net Zero, policies are not sufficient to set procedures and standards that individual sectors and organisations must follow. This must be legislated for.

Section 4

Q8. Do you agree with the adoption of a Just Transition approach? If not, what approach should we be taking and why?

Yes, we support a Just Transition approach. For us, a Just Transition is both the outcome – a fairer, greener future for all – and the process that must be undertaken in partnership with those impacted by the transition to net zero. It supports a net zero and climate resilient economy in a way that delivers fairness and tackles inequality and injustice.

Q9. How do we ensure this Just Transition – is a Commission the right way forward?

Yes. A dedicated commission independent from the Executive should be formed and oversee the process to a just transition in NI. We recommend NI follows the approach taken in Scotland to appoint a Just Transition Commission tasked with:

- providing scrutiny and advice on the ongoing development of Northern Ireland Government led just transition plans, including the application of the Just Transition Planning Framework
- advising on the most suitable approaches to monitoring and evaluation
- undertaking meaningful engagement with those most likely to be impacted by the transition, hearing from a broad range of representative voices and advising on how to ensure these can shape and contribute to just transition planning work in Northern Ireland
- engaging and collaborating with other sources of expertise, including relevant advisory bodies and relevant programmes of work (including, but not limited to the Committee on Climate Change and the Equality Commission for Northern Ireland)
- publishing an annual report to reflect on Northern Ireland's progress.

Q10. How do we make sure the public and all stakeholders (including young people) are actively engaged with Green Growth? Is a Citizen Assembly Panel the right structure?

A Citizen Assembly Panel or Citizen Forum could be explored, but to ensure a better and more active engagement of all stakeholders, including the public, it is necessary to invest in education, training, and green jobs skills development. Therefore, a green skills action plan, like the [Nature-Based Jobs and Skills Action Plan](#) 2021-2022 prepared by NatureScot, or [the Climate Emergency Skills Action Plan \(2020 – 2025\)](#) prepared by Skills Development Scotland, would be a starting point to guarantee active engagement and relevant contributions by the public and stakeholders. The Executive must ensure that knowledgeable people are providing the correct support in decision-making.

Section 5

Q11. How can we work most effectively with businesses, local government and organisations across Northern Ireland to maximise and deliver our decarbonisation and Green Growth efforts?

A key point would be clarifying roles that each player must fulfil. Responsibilities and management of resources should be defined by a detailed action plan, or more than one, if necessary. As abovementioned, appropriate action plans and ways of measuring the sustainability impact of capital assets and projects should be considered for the best administration and control of accountabilities and duties.

Despite being an overarching challenge, the financing of climate-friendly and green economic initiatives is pivotal to work effectively with all sectors. Financing will come from a variety of sources, including government funding and the private sector, so it is critical the Government is unwavering in its commitment to tackling climate change at pace, to help secure the levels of investment needed for this transition.

Q12. How should the public sector be leading by example on Green Growth?

The public sector should be committed and required to drive innovation by raising standards and directly investing in programmes that reduce climate risks and improve our quality of life. Local authorities are critical. Supported by the Government, they can lead the transition locally by taking bold action to reduce transport, domestic, industrial, and commercial and land-use emissions, unlocking local economic benefits. To optimize economic benefits, councils must be supported by government through capital funds, to decarbonize their estates, test new technologies and mobilise local action through community planning and economic development partnerships. For instance, congestion is set to cost the UK economy £307 billion between 2013 and 2030. The main way unsustainable and inefficient transport systems harm the local economy is through lost worker hours, measured in worker absenteeism due to health impacts of congestion, and time wasted sitting in traffic. Active travel (i.e., walking and cycling) and public transport investment can have significant impacts on employment and generate productivity and efficiency improvements across the economy, while reducing stubbornly high transport emissions. Every £1m of investment in sustainable transport infrastructure can create 12.7 FTE jobs in the UK economy. The benefit to cost ratio of investments in walking and cycling are estimated at 5.62:1 (where 5.62 are the benefits and 1 is the cost) ([Economic Benefits of Local Climate Action – UK100](#)). Adaptation actions, i.e., measures to protect us from the shocks and stresses of a changing climate, can generate triple dividends. Unfortunately, however, this broad concept of the financial, economic, social, and environmental benefits of actions to improve climate resilience is neither generally understood nor applied. As a result, the full benefits to society of undertaking adaptation-related policy reform and making physical investments are typically under-estimated. (Source: [The Triple Dividends of Building Climate Resilience](#)). SNI would like to see the full benefits guiding future investments by the public sector.

The Overseas Development Institute makes the case for a triple dividend from investment in nature-based solutions and other resilience initiatives, arguing investment can (a) avoid losses when disasters strike; (b) stimulate economic activity due to reduced disaster risk; and (c) incorporate other economic activities within projects initiated for disaster risk purposes. The Nature Conservancy is similarly involved in several projects financed around blue carbon, which makes the case for multiple benefits arising from investment. Action must be taken immediately to start seeing the benefits in the next 10 years.

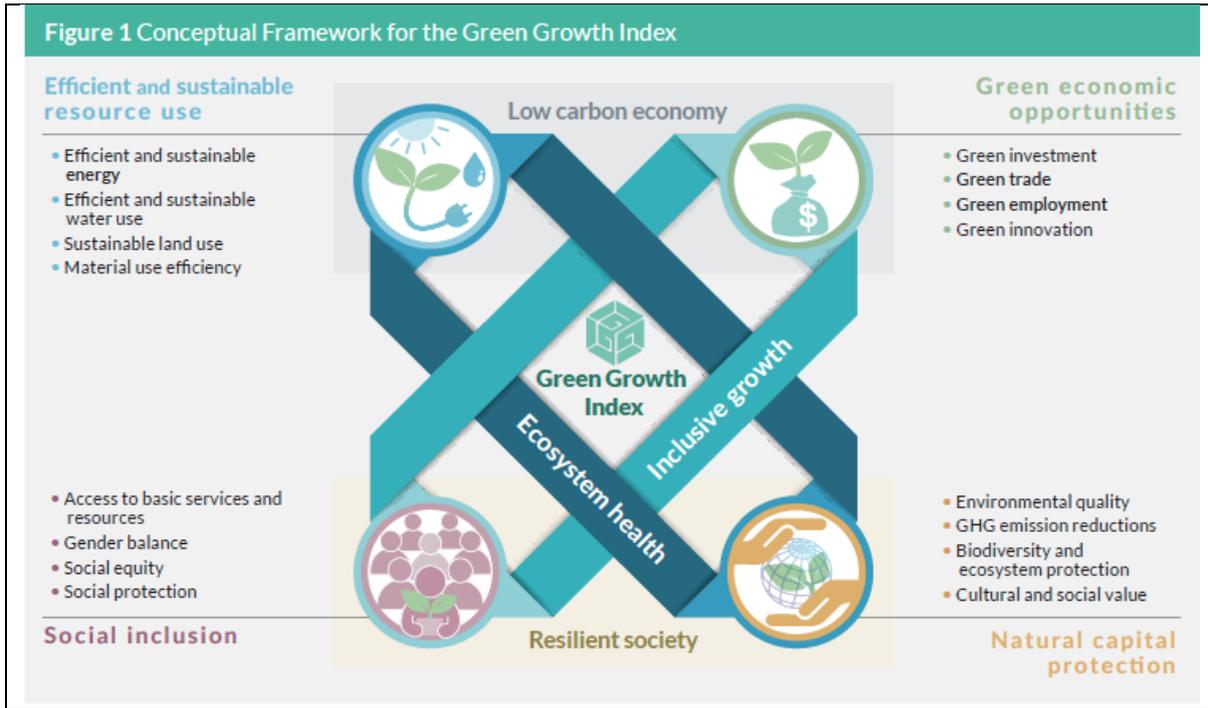


Section 6

Q13. What indicators should we use to measure the success (or otherwise) of our green Growth strategy?

The Organisation for Economic Co-operation and Development (OECD) published the [Green Growth Indicators Report](#) (2017) analysing the transition towards a more sustainable economy of 46 countries and their green growth progress based on indicators and performance of each country. The indicators considered or at least some of them, could be a good example for the Green Strategy of NI towards a just economic transition (Environmentally adjusted multifactor productivity; low land consumption; low air pollution exposure; environmentally related innovation; environmentally related taxation; GDP per capita; low income inequality; CO2 productivity (production-based); CO2 productivity (demand-based), these last two with the intention to decrease to zero; material productivity). Another interesting way of measuring the success is using the [Green Growth Index](#) to measure performance in achieving SDG targets, which is well explained in the Global Green Growth Institute Report of 2020. The country's performance is measured against four green growth dimensions – efficient and sustainable resource use; natural capital protection; green economic opportunities and social inclusion.

Figure 1 Conceptual Framework for the Green Growth Index



Q14. How can there be effective oversight of Green Growth – should there be a dedicated Assembly Committee, or independent scrutiny?

An independent scrutiny, periodically reviewed, should be commissioned by the Executive to give policymakers the confidence to move towards net-zero targets. The economic analysis of costs and benefits to NI of Green Growth considering the 82% reduction in GHG emission vs 100% does not exist but must be produced.

Section 7

Q15. Please add any other comments or suggestions you think are relevant to developing and delivering our Green Growth strategy.

SNI consider important the immediate intervention of the Executive in financing mitigation and adaptation projects and programmes, including educational and skill-based ones, that will benefit in the long-run the economy of the entire country. SNI also strongly believe in the power and action of local authorities but within a clear and precise framework set by the Government. Guidelines and national action plans must happen now, and more power should be recognised to local authorities to act fast and efficiently. Cooperation and collaboration should be supported locally and nationally. An excellent example is the NI Energy Consortium led by the DCSDC, that is coordinating the work of councils in facilitating the planning and development of energy efficient infrastructure, like EV chargers.