

Submitted to Climate Change (No.2) Bill - Call for Evidence and Views
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If on behalf of an organisation or business, please state its name: :

Rural Community Network NI

And please tell us briefly how the organisation or business relates to the subject matter of the Bill::

RCN is a charity with 250 member groups across rural NI. Climate change and provisions under any future climate change bill present, both significant challenges, and opportunities for rural communities and rural development.

1. The Bill Objectives

a) What are your views on the overall Bill objectives?

Unsure

Please give us a reason for your answer::

It is positive that the specific issues around climate change in NI are finally being given consideration and that legislation may finally happen, providing the Executive is not collapsed before legislation can be passed.
From a stakeholder point of view, it's disappointing that 2 separate bills are under consideration at the same time and that political agreement on either, merging the Bills, or pressing ahead with one or other Bills has not been reached.
We question whether the establishment of a legally binding target for a net reduction in carbon of 82% is achievable by 2050 without a matching commitment by government to fund measures that will support people and businesses to make a just transition. We note the report published 24.06.21 by the UK CCC stating that despite the ambition of the UK government to aim for net zero carbon by 2050 the policies needed to meet that ambitious target are lagging way behind
(<https://www.theguardian.com/environment/2021/jun/24/uk-policies-will-not-deliver-emission-cuts-pledge-says-climate-adviser>). We also question the level of political leadership and commitment which will be required to deliver what will be a transformation for our society.

b) Do you think that the Bill will meet these objectives?

Unsure

Please give us a reason for your answer::

The Bill may meet the specific technical objectives as set out but more important to most people is whether the outcomes of reducing net carbon emissions in a way that is just and fair is achieved in NI.

2. Emissions Targets

a) What are your views on these emissions targets?

Tell us your views:

RCN is a rural community development organisation with a diverse range of interests and views within its membership and Board structures. We are not scientifically qualified to offer a meaningful judgment on the achievability of these emissions targets for NI.
We accept that the principle of setting interim targets and reporting requirements will offer some accountability on progress towards overall

de-carbonisation of the economy and society in NI.

In principle, RCN believes in the need to de-carbonise. Setting a stretching target shows leadership and ambition but we require much wider and deeper engagement with individual citizens, communities and businesses to develop collective understanding of what moving to a net zero carbon society will mean. This will involve fundamental behavior change on an individual level and there is a need to overcome the inertia caused by the immensity of the challenges we face:

“At every level the greatest obstacle to transforming the world is that we lack the clarity and imagination to conceive it could be different.” (Robert Unger)

As well as individual change achievement of carbon reduction targets requires a Marshall Plan-style transition in our energy, land use and food system; rapid development of efficient zero-carbon technology; development of economic models fit for purpose. For example, we will need to move away from GDP as an indicator of growth, progress and development. We also need a deeper appreciation of the more-than-human world and genuinely embed equity now and in terms of next generations

b) Do you think these emissions targets are achievable?

Unsure

c) Do you think that the timescales to deliver the emissions targets are achievable?

Unsure

3. Power to Amend Targets

a) Do you think that this is appropriate?

Unsure

b) What are your views on this?

Tell us what you think about amending targets:

RCN is concerned that the power to amend targets by the Department may be used to delay further some of the more difficult policy decisions that are required to meet carbon emissions targets.

Amending targets in future may also send the wrong signals to industry, agriculture and individual households that individual changes required can be delayed or put off to some point in the future. This is a global crisis, and we cannot separate Northern Ireland from that. The CCC has identified the 2020s as the decisive decade for effective climate action to be taken. NI is already behind the curve on climate action as pointed out by Lord Deben speaking after the CCC report published 24.06.21. (<https://www.bbc.co.uk/news/uk-northern-ireland-57584774>)

4. Carbon Budgets

a) What are your views on this?

Tell us what you think about Carbon Budgets:

Our understanding is that carbon budgets will set maximum GHG emissions for Departments who must then set out policies and strategies to ensure targets are not breached. We would question why additional targets on biodiversity are not included and were surprised to see that the bill makes no reference to ammonia or other types of pollution.

Will carbon budgets be laid before the Assembly, and will MLAs be able to scrutinise and propose amendments to proposed budgets? It is unclear how the process of developing carbon budgets will happen.

How will Departments engage with citizens and sectoral stakeholders (e.g., agriculture, industry, transport, energy) in consultation to offer their input on the level of carbon budgets that is appropriate/achievable in a budget period and the strategies and plans that must be implemented to ensure budgets are not breached?

b) Do you think the proposed Carbon Budgets are an effective way of delivering on the emissions targets?

Unsure

Please give us a reason for your answer::

Unless there is effective engagement with citizens and stakeholder organisations in the development of carbon budgets there are risks that they will not deliver on emissions targets. Carbon budgets that deliver emissions targets are only possible with fundamental transformation of our economy.

c) Clause 15 of the Bill allows DAERA to adjust a Carbon Budget by carrying a proportion of the emissions level forwards or backwards to a different Carbon Budget period (up to a maximum of 1% of the later Budget) after consulting other Government Departments and the CCC. Do you think that this is appropriate?

Not Answered

Please give us a reason for your answer::

5. Progress Reporting

a) Do you think that this is an effective way to monitor progress?

Unsure

b) Please tell us your views on the proposals for progress reporting as outlined in the Bill:

Please tell us your views:

RCN would have concerns that the proposals to monitor progress will not be independent of Assembly departments. Within our system each Assembly department is run by its own Minister. Attempts to work collaboratively across Departments have, with a few exceptions, proved very difficult, if not impossible. The imposition of carbon budgets and reporting on same by one Department over another seems to us to be unachievable under our system of Departments.

In our view an independent office will be required to monitor progress and assess the performance of government departments in meeting Carbon Budgets and the interim emissions targets.

If progress is not being made or is judged to be too slow to meet interim carbon reduction targets how does the Bill make provision to address this?

There appears to be no reference to sanctions so how will public bodies who are not meeting their obligations be made to comply?

How will carbon leakage be measured and taken account of in the carbon budgeting process? Who will have responsibility for monitoring and reporting on carbon leakage and how will that be factored into subsequent budgets?

24 months seems an excessive delay with detrimental effects if carbon budgets in a particular sector are discovered not to have been met.

6. Independent Oversight

a) What are your views on this?

Please tell us your views:

The input and oversight of the CCC will be an important check on progress towards achievement of the interim targets set out in the Bill.

Will the CCC have the resource to offer independent advice and support to NI Departments and other stakeholders on the granular detail required on actions needed to achieve targets? Even with CCC oversight there will still be a need for an independent body to oversee the development of carbon budgets, Departmental Action plans and movement towards meeting targets.

Have checks been done (or are they proposed) to test the assumptions underlying CCC analysis of their various carbon reduction scenarios for NI?

7. Responsibilities on Government Departments and Public Bodies

a) Do you think that the responsibilities on Government Departments set out in the Bill are appropriate?

No

Please give us a reason for your answer::

RCN would have concerns that the proposals to monitor progress will not be sufficiently independent of government departments. Within our system, each Assembly department is run by its own Minister. Attempts to impose targets or even to work collaboratively across Departments have, with a few exceptions, proved very difficult if not impossible.

In our view, an independent office will be required to monitor progress and assess the performance of government departments in meeting Carbon Budgets and the interim emissions targets.

All this needs to be framed within an equity framework.

b) Under Clause 21 DAERA may impose Climate Change reporting duties on specified public bodies following consultation with the organisation/entity concerned. What are your views on this?

Unsure

Please give us a reason for your answer::

RCN is broadly supportive of power being given to impose climate change reporting duties on specified public bodies as required. This may be needed as the understanding of climate change impacts and data on climate change develops over the coming decades.

As discussed earlier this type of power may be better exercised by an independent office instead of DAERA or any other Assembly department.

It is unclear as to which public bodies (in addition to Assembly Departments) will be subject to carbon budgets and policies/strategies to meet carbon budgets. Our experience from monitoring the implementation of the Rural Needs Act suggests that the Bill should set out which public bodies are subject to the Act and a clear process whereby public bodies can be added or removed from any schedule.

How will slow progress or regression be addressed? How will emissions targets be reached if there are no powers of enforcement to ensure compliance with emissions targets?

8. Resource Implications

a) What are your views on this?

Please tell us your views:

RCN is unable to comment on the estimate of the net additional cost of the Bill between 2022 and 2050 but accepts that this can only be an indicative estimate due to the many unknown elements in producing this type of estimate so far into the future.

We agree that there will be a significant requirement for capital investment to put in place appropriate low-carbon infrastructure and technologies. To enable a transition to a low carbon economy and society will require a transformation of our economy with an unprecedented level of public sector support and incentives to facilitate the transition to a decarbonized economy across all sectors. The NI Executive does not have the financial powers to support this level of investment on its own and must engage with the UK government to ensure that ambitious climate change targets are realized through policy development that meets the needs of NI.

b) What do you think are the most important issues for government to consider when making funding plans to help achieve the aims of the Bill?

Please tell us your views:

Consistency across strategies – we cannot allow conflicting ambitions of various Executive strategies to cause derailment of climate change ambitions. So, the Industrial strategy and strategies for DAERA, Department for Infrastructure, etc. must be compatible with the objectives of the Climate Change strategy including proposed carbon budgets.

The Bill should not cause undue hardship to any one section of the community – a fair and just transition to decarbonization of our economy and society should be central to any policymaking. RCN is concerned that the Bill does not refer to the need for just transition and ensuring that the costs of any climate change mitigation measures are borne fairly across society. Research shows that there is a huge asymmetry in responsibility for emissions. There needs to be a rapid and near-term reduction in CO₂ from the top 10% of emitters. “If the top 10% of global emitters were to reduce their carbon footprint to the level of a typical EU citizen’s global CO₂ emissions would be cut by 33%” (Reference Kevin Anderson

https://www.slu.se/globalassets/ew/org/centrb/fr-lantbr/pdf-filer/aktiviteter-2016/kevin-anderson_framtidens_lantbruk_slu_konferens_lantbruk_1-5grader_161026

9. Access to Specialist Advice

a) Do you think that this is appropriate?

No

b) Are there other sources of expertise that may be needed to inform Climate Change policy and to report on progress in terms of meeting the emissions targets?

Tell us other sources of expert advice:

As NI Departments develop Carbon budgets and mitigation plans it is vitally important that they truly listen to citizens and those working across sectors impacted to develop their understanding of the detail of the changes required in addressing climate change.

One example shared by an RCN board member followed a conversation with a driver who collects milk from dairy farms for processing. He shared an example of one major supermarket’s insistence on having ‘spreadable’ butter which can only be produced from milk with a high iodine content by cows on a high nutrient feed. In practice this requires different milk collection trucks to be on the road; those collecting milk for ‘spreadable butter’ and those that collect ordinary milk – even though the farms producing different types of milk can be next to each other. This story illustrates some of the detail of the challenges that we face and will require changes for farmers, processors, supermarkets, and consumers.

10. Transboundary Considerations

a) What are your views on how the Bill addresses transboundary issues in relation to Climate Change? By transboundary we mean different countries and/or jurisdictions working together.

Tell us your views on Transboundary Issues:

RCN agrees that transboundary considerations are vital to ensure we understand the impacts of any policies that emerge from the development of Carbon Budgets and the mitigation plans which flow from them. Our policies and plans must work for citizens, businesses, and farmers across these islands. Some farmers farm on both sides of the Border, many businesses have integrated supply chains, either North-South and/or East-West. Detailed consideration of transboundary issues will need to take place as part of the development of the Carbon Budgets and mitigation plans which emerge. Some consideration will need to be given to how any oversight structures that monitor the implementation of carbon budgeting can work with counterpart authorities in neighbouring jurisdictions to address transboundary climate change issues. It is vital that imported and exported food is accounted for in Carbon budgets and that carbon leakage as a result of policy or strategy change is identified and accounted for.

b) Do you think that there should be a transboundary approach to Climate Change?

Yes

11. Additional Information

a) Are there any other measures not included in the Bill that you think should be included and why?

Tell us if anything is not included:

RCN would suggest that there should be a wider duty on Departments to have due regard to the impacts of climate change and the need for its mitigation in carrying out its functions.

This is a broader framing of the issue and would necessitate a more holistic approach to addressing climate change and biodiversity loss in addition to the carbon budgeting process.

b) Do you have any other comments you would like to make?

Tell us anything else you think we should know :

The importance of education and learning in the whole area of climate change and biodiversity loss needs to be addressed across society if we are to make the required changes to de-carbonize. People will not care about the climate and biodiversity loss until they can learn to see, notice and care. An example of this is that the Forest Service is disinvesting in its education and learning function by winding down the team of Forest Service Guides. Their wisdom and expertise will be lost leaving a massive vacuum in connecting citizens to and growing their appreciation of the rest of the natural world.

Political leadership and cross-departmental working are both vital to bring the public along on making politically unpopular choices. We have a chance on this issue to transform our society in a way that the rest of the world could learn from. NI for once could be seen as innovative, courageous, and forward-thinking as opposed to a climate laggard. A progressive region that is using the advantage of its size to shift quicker than others to a low carbon economy that can create jobs, improve public health, ensure energy security and improve efficiency

Huge levels of resources will be needed to make these transformations as well as support for a just transition. The discussion needs to start with the UK government and Irish government (concerning transboundary issues) on how a just transition in NI can be achieved financially. NI cannot rely on the UK or Irish governments knowing or understanding the unique circumstances in NI.

There needs to be a sectoral plan for tourism. How can we make NI an eco-tourism destination? This has the potential to be a big opportunity for rural communities if combined with the transition to a sustainable farming/food system. These are twin aims that complement each other in the transition to a low carbon economy/society.

The climate change debate in rural communities is often framed in the negative – what we must give up or change as opposed to what we could gain and what opportunities arise from the changes. For example, greater working from home for many can bring about balanced regional development, reinvigoration of small rural towns and villages, with people shopping locally and travelling less. We need to explore ways to sweat the assets that we hold to meet the aims of the Bill.

Communication and engagement with citizens is critical to identify issues and support behaviour change at a household level is vital in motivating people to adopt change and overcome the inertia because the issues facing us are immense.