

Response ID ANON-2ENT-PJSH-E

Submitted to Call for evidence and views on the Climate Change Bill
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Introduction

1 How would you like your response to be published?

I would like my response to be published

2 What is your name?

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4 Please indicate if you are providing a submission:

On behalf of an organisation or business

If on behalf of an organisation or business, please state its name::
Rural Community Network

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

We are a network of over 250 rural community groups across NI. Although a Framework bill the Climate Change Bill will have significant impacts on rural communities through sectoral plans developed to meet the next zero carbon target

1. The Policy Objectives

1 What are your views on the overall policy objectives?

Tell us what elements of the Bill you think will be effective or won't be effective.:

RCN supports the Bill objective to mitigate the impact of climate change in NI.

We question whether the establishment of a legally binding net zero carbon target 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.

We are not qualified to judge whether the net zero carbon target for NI proposed by the Bill is practically achievable.

We agree that the Bill should provide for the establishment and powers of a NI Climate Commissioner and NI Climate Office but would like to know how the role and powers of a Climate Commissioner and Climate Office will complement the independent Environmental Protection Agency envisaged in New Decade New Approach.

We agree that the Bill should guarantee existing environmental and climate protections.

2 Do you think that the Bill will meet these objectives?

Unsure

Please give us a reason for your answer.:

We believe that if the political will exists and agreement in the Assembly can be secured then the Bill can meet its objectives by setting a net zero carbon target and establishing a Climate Commissioner and Climate Office. The more important question is if this framework can drive the sectoral plans to produce policy change that will lead to achievement of the target. As discussed above ambitious targets can be set but will government have the resolve to follow through on politically unpopular policy choices in the short term to work towards meeting the Bill's objectives

2. Declaration of a Climate Emergency

1 What are your views on this?

Tell us your views on declaring a Climate Emergency in Northern Ireland.:

We agree that the Bill should declare a Climate Emergency.

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>)

In declaring a climate emergency, a government admits that climate change (or global warming) exists and that the measures taken up to this point are not enough to limit the changes brought by it. It may also be useful for the Climate Change Bill to state that we should not be breaching planetary boundaries in terms of climate but also biodiversity, habitat loss, nutrients etc.

3. Net Zero Target

1 What are your views on the target set out in the Bill to achieve a Net Zero carbon, climate resilient and environmentally sustainable economy by the year 2045?

Tell us your views on the target.:

The transition to net zero must be just and the costs for making the transition should not fall more heavily on those people who are less able to bear the costs.

In principle, RCN believes in the need to de-carbonise, but whether we can achieve net zero by 2045 we are not able to make an informed judgment. 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 inertia caused by the immensity of the challenges we face. A range of views were expressed over achievability of the net zero carbon target by the RCN Board. Some Board members believe it cannot be achieved in NI. Others were of the view that the ambition should be for net zero carbon and even if the target is missed it is still important to have that aim. Whether the target is net zero by 2045 or 83% by 2050 NI will require a huge transformation.

RCN believes that policies to de-carbonise our economy and society present opportunities as well as challenges for rural communities. However, it is important that the perspectives in rural communities are heard and that government invests the resources needed to allow citizens to take meaningful action. Action and leadership on these issues will need to happen at government level to support and encourage behavioural change at individual and community level in order to meet carbon reduction targets.

The Assembly should consider the development of a Citizens Assembly on Climate Change as has recently happened in the UK and Scotland to enable an informed debate on reaching the net zero target. This work could then be used to inform climate action plans and sectoral action plans.

2 Do you think that the Net Zero emissions target is achievable?

Unsure

3 Do you think that the timescale to deliver the Net Zero emissions target is achievable?

Unsure

4 Do you think that the timescale outlined in the Bill to achieve Net Zero should be revised if circumstances change?

Yes

Please tell us why.:

Fresh evidence on the impact of climate change is emerging all the time and the Bill should be drafted so that new evidence or new technological advances can be considered and evaluated to allow the timescale to achieve net zero to be revised.

We would be concerned that timescales are revised downwards i.e. that a future Assembly decides to extend the target time for carbon targets to be reached. The current scientific consensus is that rapid and immediate action is required to address climate change and that any further delay will require even more radical action which will cost more and give people less time to adapt. The CCC has identified the 2020s as the decisive decade for effective climate action to be taken. NI is already behind the curve as pointed out by Lord Deben speaking after the CCC report published 24.06.21 mainly due to the collapse of the NI Assembly in 2017. (<https://www.bbc.co.uk/news/uk-northern-ireland-57584774>)

4. Climate Action Plans

1 What are your views on this?

Tell us your views on requiring the government to produce Climate Action Plans.:

This is an essential step to compel government to set out clear action plans to achieve the Net Zero target. This will give clear indications to individuals, communities and businesses about the changes required in the next 5 years, the policies that will underpin change and the resources that will support it. The Action Plan process needs to involve clear mechanisms for citizen engagement and involvement. Departments need to clarify in those action plans what a just transition will look like and how it will be supported and resourced. CAPs need to complement other key Executive strategies such as anti-poverty, industrial, environmental, infrastructure, housing strategies etc.

This should enable individuals and households to plan with more certainty how they will need to adapt to meet interim targets set by government on the

road to net zero carbon. It will also give clear signals to the private sector in relation to investment in the green economy and the skills needed to support it.

We would question the resources and capacity the Executive Office(EO) will need to be able to produce a Climate Action plan. Will the EO act in a coordinating role at the heart of the Executive? How will the CAP process be developed across a wide range of NI Departments with responsibility across the sectors identified? In our view it is important that these practical operational details are specified as clearly as possible in the Bill. In our experience of monitoring of the implementation of the NI Rural Needs Act (2016) we have found that duty holders can largely determine how they comply with the duty. DAERA officials have no role in enforcing the duty and can merely report on how all other duty holders have complied in the past year and offer advice and support on its implementation.

2 Do you think the proposed Climate Action Plans are an effective way of delivering the Net Zero target?

Yes

5. Office of a Climate Commissioner

1 What are your views on this?

Tell us your views on the establishment of a Climate Commissioner.:

RCN, in principle, supports the concept of a Climate Commissioner. We believe that the role of the Climate Commissioner should be clearly set out to ensure it is separate to but complements the role of the independent Environmental Protection Agency envisaged in New Decade New Approach.

RCN would like more detail on how the Climate Commissioner is held accountable for their role. There appears to be no detail on accountability mechanisms for the Climate Commissioner's office in the Bill.

2 What role and powers do you think the proposed Climate Commissioner should have?

Tell us the specific roles and powers.:

The role of the Climate Commissioner is to independently assess how the overall Climate Action Plans are being developed and implemented to identify successes and highlight where targets and policies are not being achieved. The Climate Commissioners office must be resourced to ensure it can perform this role effectively and be able to make public reports that objectively inform stakeholders and citizens on progress towards carbon reduction.

The Climate Commissioner also has an important role in seeking advice and guidance from the UK CCC. The Climate Commissioner office needs to consider how best it interacts with authorities in the Republic of Ireland, Scotland and Wales to identify and address any cross-boundary issues across the various sectors.

RCN would suggest that the Climate Commissioner may need powers of enforcement. The Rural Needs Act NI (2016) introduced a statutory duty on public authorities to have due regard to rural needs. Implementation has been patchy, and the legislation does not set out any powers of enforcement when duty holders are found not to comply with the duty.

6. Sectoral Plans

1 Do you agree with the proposal to have specific sectoral policies associated with the Climate Action Plans?

Yes

2 What impact do you think that these sectoral plans will have in terms of helping to achieve the Net Zero target?

Please tell us what you think the impact will be.:

It will be important to set out detailed and specific policies and plans for the various sectors as they aim to decarbonise. Setting a target for renewable electricity generation and backing that up with considerable public investment set the direction for electricity generation policy and sent a clear signal to all stakeholders and citizens that this was the objective.

In our view it is unclear if the Bill is recommending separate sectoral targets for net greenhouse gas emissions, water quality, air quality, soil quality and biodiversity across the relevant sectors. RCN would support the approach of setting separate sectoral targets to ensure greater transparency and accountability of sectoral contributions to meeting the overall target.

We welcome the proposal that sectoral plans will:

“support jobs and growth of jobs that are climate resilient and environmentally and socially sustainable; support net-zero carbon investment and infrastructure; create work which is high-value, fair and sustainable; reduce inequality as far as possible; reduce, with a view to eliminating, poverty and social deprivation;”

3 How do you think the above sectors might be affected by the proposals?

Please tell us the sector(s) and how they will be affected.:

Energy Production & Supply/Heating & Cooling

Retro fitting and de-carbonising heating systems in housing will need substantial grant support by government. Support will need to be targeted at social/affordable landlords and low-income private owners to make the transition. This aligns with the principle of just transition which must be a foundation of climate action plans and sectoral plans. Older houses in rural communities are harder to heat and will need more retro fitting. This additional premium for rural retro fitting and de-carbonising needs to be included in any scheme design.

More community involvement in wind energy is needed. Scotland has great examples of community ownership/partnerships which help to address objections to the siting of wind turbines in rural communities. A lot of communities are expressing objections in the North West to further renewable energy applications. The electricity grid will also need investment as it is currently configured to run from East to West. A local energy grid is being piloted by ESB in the Dingle peninsula in Kerry. RCN considers that it would be better to produce energy locally and distribute to local grids.

In 2017 ROCs were reduced and feed in tariffs for solar panels were reduced which has slowed the development of micro generation. If more funding was available for micro generation it would further expand and help us meet our climate change targets. Use of green hydrogen to capture spare capacity from the grid should be developed as an export. Energy production/exporting should be seen as an opportunity for rural communities.

RCN would have some concern about the use of heat pumps as the primary method of de-carbonising heating in homes currently dependent on OFCH. Some Housing Association experience of ground source heat pumps is that they were found to be more expensive to run than Oil Fired Central Heating. The transition to heat pumps will require long term government resource commitment to give confidence to householders and businesses.

Agriculture/Land Use/Land Use Change & Forestry

Farmers know that they must be part of the action that society needs to take on climate change, but many fear that farming will be disproportionately affected due to the emissions produced by agriculture. RCN would not want to see a climate change bill which reduced meat and dairy production in NI to simply replace it with meat and dairy imports from other countries which requires a higher carbon footprint to produce. When the carbon emissions of importing that produce here is added this displacement would be completely counter-productive in terms of the global picture on carbon emissions.

RCN are also concerned about how NI will address the economic impact of the bill. We still do not know how future farm support will operate in NI and that support framework will have a key role to play in enabling farmers to address climate change. For RCN this is a key issue if the just transition principle of the Bill, to ensure that the people who are least able to meet the costs of transition don't bear the brunt of the changes, is adhered to. If farmers got much better prices for their output, then the idea of reducing stock densities would be less daunting. One of the most immediate consequences of fairer output prices for farmers would be more expensive food for consumers. This leads to a series of more fundamental questions about how much consumers are prepared to pay for food and how much low-income households can realistically afford to pay for food. The last decade has seen an increase in foodbanks and food poverty across rural Northern Ireland and most market towns now have a food bank. Low wages, high levels of household debt and the restrictions imposed across the social security system have led to an increase in poverty.

If a fairer food system can be developed where producers are paid fairer prices, wage levels are increased across society and greater levels of social protection are available across the social security system then potentially it will be more economically viable for farmers to reduce stocking density, receive fairer prices for their output as well as additional payments for managing land and habitats in ways that reduce carbon, and protect bio-diversity. However, farmers are justifiably concerned about the recent trade deal agreed between the UK and Australia. UK farmers are being encouraged by the Westminster government to reduce carbon, maintain high welfare standards and farm in a more nature friendly way. Yet the UK Australia trade deal will allow meat farmed in Australia at significantly lower standards and with a much higher carbon footprint to be imported into the UK.

Transport

Proposals to de-carbonise transport will have a greater impact in rural communities than in urban communities. There are additional challenges in providing for public transport and active transport in rural communities due to the dispersed settlement pattern and longer travel distances. The first consideration should be how can reduce the need for rural citizens to travel be reduced. Remote working needs to be supported in a more systematic way and employers encouraged to allow employees to work from home at least for part of the week (the feasibility of many jobs to be done remotely has been demonstrated by the pandemic). Local businesses in rural communities could expand to provide more local employment opportunities if broadband and mobile phone networks were improved across rural NI. This can be seen as an opportunity for sustainable development in rural communities.

NI needs significant investment in charging infrastructure for electric vehicles in rural communities as well as investment in public transport infrastructure. These issues are currently being considered by the Dept for Economy consultation on the Energy Strategy for NI. We need to ensure that the grid is upgraded to allow widespread home charging of electric vehicles across the electricity network. We also need to expand the number of EV public charging points and facilitate the installation of rapid charging points. The higher purchase costs of EVs is still a factor and most moderate/low income households will need support to transition from petrol/diesel vehicles to EVs.

Could the train network across NI be revitalised? Will the investment be there to make improvements and extend the rail network? ABC Council are exploring the feasibility of re-opening rail line between Portadown and Armagh.

Active travel in rural communities needs to be considered in much more detail in partnership with rural citizens to understand how it can be redesigned to meet travel needs. The Department for Infrastructure and local Councils need to prioritise how they can extend active travel networks into rural communities. Public and active transport needs to be considered in much more detail so it can be better facilitated in rural communities to reduce the mileage required for EVs and to allow rural dwellers to connect in with public transport networks.

Business & Industrial Processes/Waste Management

Society needs to move away from the idea of manufacturing a brand-new product from virgin materials, using that product and then disposing of it. Job opportunities can be developed as part of developing our capacity for reusing and recycling in the circular economy. Remaking products can lead to new manufacturing processes and jobs. The circular economy has the potential to be a big employer in rural communities.

Currently, when reusable products/materials go into waste/recycling streams they cannot be taken out and reused. Councils who operate local amenity sites will not allow people to re-use furniture etc. and a licence is required to remove materials from waste/recycling streams. Fermanagh & Omagh District Council have addressed this issue by introducing a "reuse" area in their amenity sites where people can leave products to be reused or repurposed. A good example of this reuse initiative is paint which is a very expensive item to recycle or send to landfill. People leave half empty tins of paint and other amenity site users can reuse these small amounts of paint for small jobs. This re-use initiative also allows old furniture to be refurbished and distributed through charity shops.

Sectoral plans for waste management must consider removal of waste disposal from the existing processes. The NI Executive is not taking this seriously enough and is holding up key decisions on matters such as Energy from Waste (EfW). The NI Executive, through poor regulation, permits shipping massive tonnage of waste abroad (with the associated additional carbon footprint) and continually enables landfills to be permitted to emit greenhouse gases on a 24/7 basis. An example of this has been the rural landfill at Mullaghglass on the outskirts of Lisburn & Belfast. Sectoral plans will need to pay more attention to removing the need for landfills, enable re-use facilities for re-useable items, but also how to use the non re-useable i.e. recyclable material for the benefit of the public through EfW.

NI spends £3 billion out of the public purse on products and services annually. Using green public procurement principles Government should be mapping the carbon emissions of this spend and taking measures to reduce it in line with climate change targets. Once this is mapped, targets can be set and ongoing measurement to ensure they are delivered. The UK government recently signaled that firms must commit to net zero Carbon by 2050 and have produced a carbon reduction plan to win major government contracts see:

<https://www.gov.uk/government/news/firms-must-commit-to-net-zero-to-win-major-government-contracts>

NI needs to monitor where models of good practice in relation to addressing climate change are developing and we need to learn from those models around the world. We also need to think through how some policies e.g., scrappage schemes for diesel cars can lead to other issues. In the past in some countries scrappage schemes to remove older more polluting vehicles led to waste problems scrapping and recycling metal and parts from old vehicles. There are also opportunities for research and development for our third level institutions to develop solutions to address climate change.

There are likely to be additional costs for households in rural communities to address climate change and government will need to fund some of these costs to allow people across society to make these transitions.

7. Resource Implications

1 What do you think the resource implications of the Bill will be for:

The Department of Agriculture, Environment and Rural Affairs :

The Bill doesn't appear to address any issues in relation to resource implications of the Bill for DAERA and until legislation is passed and sectoral plans are developed, we are unable to comment on potential resource implications.

The Northern Ireland Executive :

We would question the resources and capacity the Executive Office will need to be able to produce a Climate Action plan? Will the EO act in a coordinating role at the heart of the Executive? How will the CAP process be developed across a wide range of NI Departments with responsibility across the sectors identified? In our view it is important that these practical operational details are specified as clearly as possible in the Bill. In our experience of monitoring of the implementation of the NI Rural Needs Act (2016) we have found that duty holders can largely determine how they comply with the duty. DAERA officials have no role in enforcing the duty and can merely report on how all other duty holders have complied in the past year and offer advice and support on the implementation of the duty.

Specific sectors of the Northern Ireland economy :

The Bill doesn't appear to address any issues in relation to resource implications of the Bill for the various sectors and until legislation is passed and sectoral plans are developed, we are unable to comment on potential resource implications. A general comment would be that 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 de-carbonised economy across all sectors. The NI Executive does not have the financial powers to support this level of investment on their 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.

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

Tell us the potential issues related to funding plans.:

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.

The Bill should not cause undue hardship to anyone section of the community – a fair and just transition to de-carbonisation of our economy and society should be central to any policy making

8. Access to Specialist Advice

1 Do you think that this is appropriate?

Yes

2 Are there other sources of expertise that may be needed to inform progress to achieve the Net Zero target?

Please tell us the other sources of expertise.:

As NI Departments develop Climate Action Plans and Sectoral Plans it is vitally important that they truly listen to citizens and those working in each of those sectors 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 his experience in the dairy industry 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 one story illustrates some of the challenges that we face and will require changes for farmers, processors, supermarkets and consumers.

9. Responsibility on Public Bodies

1 What are your views on the roles and responsibilities placed on public bodies as set out in the Bill?

Tell us your views on the potential impact on public bodies.:

RCN's concern is that there is a need for accountability, transparency and co-ordination between the various public bodies that are responsible for achieving emissions targets. There also need to be consequences for those organisations and individuals who fail to meet their obligations under climate change legislation.

2 Do you think that there should be a lead responsible government Department for delivering the aims of the Bill?

Unsure

3 If you think there should be a lead Department, please tell us which one and why:

Not Answered

Why do you think this government Department should be responsible?:

4 What are your views on the implementation of a carbon usage-tracking scheme?

Please tell us your views.:

RCN members from a farming background have expressed the view that more detailed research is urgently needed on carbon production and carbon sequestration in NI agriculture to inform our approach. Whilst we can calculate how much GHGs farming is emitting, we have no means yet of calculating how much farming sequesters.

10. Transboundary Considerations

1 What are your views on how the Bill addresses transboundary issues in relation to Climate Change?

Please tell us your views on the transboundary considerations.:

RCN agrees that transboundary considerations are vital to ensure we understand the impacts of any policies that emerge from the development of the Climate Action Plans and the sectoral 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 or East West.

Detailed consideration of transboundary issues will need to take place as part of the development of the Climate Action Plans and sectoral plans which emerge. Some consideration will need to be given to how the climate commissioner's office can work with similar authorities in neighbouring jurisdictions to address transboundary climate change issues.

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

Yes

11. Rural Impact Assessment

1 Do you think it is important to assess the impact on rural communities of the proposals provided for in the Bill?

Yes

2 What do you think is the best way to consider the potential rural impacts?

Please tell us how we should consider the rural impacts of the proposals. :

The difficulty with the Bill is that it doesn't fall within the scope of the Rural Needs Act – individual MLAs are not designated as public authorities by the Rural Need Act and so are not subject to the duty. There is no clause in the Rural Needs Act which deals with Rural Needs in relation to Private Members Bills. RCN view this as a loophole that may need to be considered and possibly closed by amendment to the Rural Needs Act 2016 to account for any future Private Members' Bills.

The nature of the legislation, as a framework bill, means it is difficult to state the explicit impacts on rural dwellers of the various aspects of the Bill.

With the sectors impacted, particularly agriculture, land use and forestry, transport and heating and cooling there will be specific rural needs depending on the policies which emerge in the Climate Action Plan and sectoral plans. Rural Needs Impact assessment may be more meaningful when the Climate Action Plan and the Sectoral Plans are produced as these plans will be developed by public authorities who are subject to the Rural Needs duty.

This will need to be part of the detailed scrutiny of the Climate Action Plan and sectoral plans envisaged in the Bill which will be subject to full public consultation.

12. Additional Information

1 Are there any other measures not included in the Bill that you think should be included?

If so, what other measures should be included and why.:

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-carbonise. People will not care about the climate and biodiversity loss etc. until they can learn to see and notice it. An example of this is that 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 and no one else will be picking that up in the same way to transfer that wisdom and expertise to Forest users and the wider community

2 Do you have any other comments you would like to make about the Climate Change Bill?

If so, please tell us.:

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 make a transformation in our society that the rest of the world could learn from. NI for once could be seen as innovative, courageous and forward thinking as opposed to 'lagging behind'. 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 resource will be needed to make these transformations as well as support for a just transition. Discussion needs to start with the UK government and Irish government (in relation to 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 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, 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 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.