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Submitted to Carbon Budget Consultation
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Introduction

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Organisation:
Rural Community Network

Questions 1 - 7

Question 1. Do you agree that DAERA should follow the current advice provided by the CCC and keep the current 2030 emissions reduction target in the Act of an at least 48% reduction in emissions compared to the baseline?

Yes

If no, please provide your reasons and any suggested alternative (Noting, that if the target is to be changed, that the Act only allows it to be changed to a higher percentage):

As an organisation we aren't qualified to challenge expert advice – we are not experts.
However, in terms of building consensus and understanding RCN would recommend that:

- DAERA invest in further awareness raising and communication on how carbon emissions are calculated.
- Offer examples to illustrate what carbon emissions reductions will mean at household, community and NI level. RCN believes it is vital that DAERA undertake rural needs impact assessments on proposed schemes and policies that emerge from the emissions reductions targets to ensure the “just transition” principle is embedded into practice.
- The Department needs to ensure robust systems are developed for estimating and monitoring emissions from various sectors to enable effective tracking of progress against targets.
- The Department should also clarify the position on territorial emissions and whether carbon emissions generated from imports and services we benefit from in Northern Ireland are accounted for in the journey to net zero.
- DAERA should clarify the Northern Ireland share of surrounding seawaters to enable an estimation of the amount of carbon which is stored there.
- RCN suggests that DAERA publish a schedule for research on these issues to allow stakeholders to contribute to planning and prioritisation of these research needs.
- RCN was surprised by the absence of any discussion on contingency arrangements in the absence of the NI Executive and an assessment of how this could impact on the likelihood of achieving Net Zero.

DAERA and other Departments need to reframe some of these change processes in a more positive way. Many of the steps we need to take towards net zero could lead to change for the better across society, for example, reducing carbon by phasing out fossil fuel heating systems in buildings should lead to an improvement in air quality.

Question 2. Do you agree that DAERA should follow the current advice provided by the CCC and set a 2040 emissions reduction target of an at least 77% reduction in emissions compared to the baseline?

Yes

If no, please provide your reasons and any suggested alternative.:

Question 3. Do you agree that DAERA should follow the current advice provided by the CCC and set the first carbon budget at a level that has a 33% average annual reduction in emissions compared to the baseline?

Yes

If no, please provide your reasons and any suggested alternative.:

Again, RCN are not experts so little we can add on the levels suggested for the first 3 carbon budgets.

A legislative requirement set out in the Climate Change Act is that carbon budgets must be set to take account of CCC advice. If Northern Ireland is seeking to depart from CCC advice a statement must be made to the NI Assembly. The DAERA consultation does not identify any contingency arrangements for this process in the event of the Assembly being suspended/collapsed?

In a 5-year period how often is it realistic to review progress – how much monitoring and evaluation can be done in “real time”?

RCN welcomes the fact that DAERA is required to give due regard to the expertise and advice of:

- The Intergovernmental Panel on Climate Change (IPCC); and
- The Republic of Ireland Climate Change Advisory Council (CCAC)

We acknowledge that “While there are differences in terms of starting points and carbon budget periods in Northern Ireland and Ireland, there is some consistency in terms of the 2030 targets in both jurisdictions and the scale of emissions reductions recommended across the carbon budget periods leading up to the mid-2030s”, it would have been useful to see some analysis of the potential cross border impacts, issues, alignments and potential contradictions. It is important that policy and practice in the journey to net zero are aligned as far as possible in both jurisdictions.

RCN is concerned that although targets for emissions reduction and carbon budgets are being set proposals to meet emissions reduction targets and carbon budgets are not yet being set. RCN is concerned that Northern Ireland has started too late in these processes and that targets that will be almost impossible to achieve.

Regulatory impact Assessments conducted as the Climate Change Act was passing through the legislative process estimated costs of £466m p.a. for Northern Ireland to meet the net zero target. RCN suggests that the NI carbon budget align with the actual NI Executive budget as a way to start moving the dial on some of these targets/areas.

Question 4. Do you agree that DAERA should follow the current advice provided by the CCC and set the second carbon budget at a level that has a 48% average annual reduction in emissions compared to the baseline?

Yes

If no, please provide your reasons and any suggested alternative.:

Question 5. Do you agree that DAERA should follow the current advice provided by the CCC and set the third carbon budget at a level that has a 62% average annual reduction in emissions compared to the baseline?

Yes

If no, please provide your reasons and any suggested alternative.:

Question 6. Do you agree that DAERA should follow any updated advice and recommendations from the CCC (as a result of the publication of the Northern Ireland 2021 Greenhouse Gas Inventory) when setting the first three carbon budgets?

Yes

If no, please provide your reasons.:

Question 7. Can you provide any information (relating to the potential financial, economic, social, rural and equality impacts) which will help inform the completion of the relevant impact assessments on the proposed carbon budgets?

Please specify:

RCN is happy to offer any advice and support it can to DAERA to inform the completion of potential rural and equality impact assessments on proposed carbon budgets and other policy, strategy or service delivery plans in relation to the Climate Change Act.

Question 8 - 11

Question 8. Do you think that the Northern Ireland Executive should follow the advice provided by the CCC and choose the Stretch Ambition Scenario?

Not Answered

If no, please provide your reasons and any suggested alternative.:

Question 9 (a). The Speculative DACCS Option to reach Net Zero by 2050: Do you think that the Northern Ireland Executive should choose the Speculative Direct Air Capture with CCS (DACCS) option to reach Net Zero?

No

If no, please provide your reasons and any suggested alternative.:

Considerable scepticism exists on the potential for utilising engineered Greenhouse Gas removals to help meet Net Zero target. For instance, carbon capture & storage has seen negative media coverage and has been criticised as being unable to meet the targets it sets for carbon capture as well as

being extremely costly <https://ieefa.org/resources/carbon-capture-remains-risky-investment-achieving-decarbonisation>. It is considered by some stakeholders as greenwashing. Robust evaluation of cost benefit analysis of utilising engineered Greenhouse Gas removals is required.

Question 9 (b). The Speculative Agriculture Option: Do you think that the Northern Ireland Executive should choose the Speculative Agriculture option?

Not Answered

If no, please provide your reasons and any suggested alternative.:

Question 9 (c). Other Speculative Options: Do you think that the Northern Ireland Executive should consider other speculative options such as (1) enhanced rock weathering and (2) addition of biochar to agricultural land?

Not Answered

If no, please provide your reasons and any suggested alternative.:

Question 10. Agriculture Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should diverge from the CCC sector advice to deliver the required outcomes for the first carbon budget period and that these can be achieved through the actions outlined in the Agriculture sector summary?

No

If no, please provide your reasons.:

Agriculture

The CCC advice states that a reduction in emissions from agriculture of 35% in the next decade is required to hit Net Zero by 2050. RCN is concerned that substantial public funding will be required to incentivise the changes needed in agriculture to hit this target. In the current absence of an Executive in Northern Ireland and with a reduction in public sector funding in most Departments it is difficult to see how the change processes required in agriculture can happen at the speed required. This is a key question for a NI Executive to decide but what is the contingency in the ongoing absence of an Executive?

Farmers are already involved in measuring carbon footprint and developing data.

The CCC advice report is recommending a reduction in livestock numbers by almost a third compared to the DAERA position of no requirement for a reduction in livestock numbers to meet the 2030 emissions reduction target as clarified by DAERA staff in the consultation workshops. DAERA instead have identified the need for a range of measures including changes in farm nutrient management, changes to livestock feed, reduction in the age of slaughter of livestock etc. Research is underway but how long will this take and is it unlikely that progress on these proposed changes to livestock and nutrient management will make significant change in this carbon budget period? There is a significant emphasis on research to provide new directions for agriculture for the 2nd and subsequent carbon budgets.

Advice from CCC states that:

"Any policies and proposals to decarbonise sectors will be dependent on major new capital and resource funding to plan and deliver the commitments, as well as appropriate staff resources, behavioural changes and political acceptance."

We concur that all these factors need to be mobilised to meet our interim targets on the path to net zero.

Question 11: LULUCF Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should follow the LULUCF sector advice provided by the CCC?

No

If no, please provide your reasons.:

Significant land release will be required to ramp up afforestation and peatland restoration rates.

A dramatic increase in peatland restoration is being indicated as making an important contribution to reducing carbon? A 23,000 hectare target for peatland restoration and rewetting by 2027 seems ambitious although the target for sustainable management of peatland identified in the NI Peatland Strategy is 150,000 hectares by 2050. What does that mean in reality – how much will it cost – is it achievable in such a short timescale.

There will be implications for fuel poverty in some rural areas where people still use peat as a solid fuel and for people/businesses employed in peat extraction. There is significant potential for retraining and new careers in peatland management and restoration and a significant contribution to biodiversity restoration.

Questions 12 - 14

Question 12 (a). Buildings Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should consider the CCC advice on residential buildings, and develop a plan to improve energy efficiency and reduce reliance on fossil fuels, taking account of the capacity and capability of the low-carbon heating sector in Northern Ireland?

No

If no, please provide your reasons and any suggested alternative.:

CCC advice is that by 2030 all new heating installations off the mains gas grid are to be zero-carbon and that by 2025 – installation of oil fired central heating is to be phased out in public buildings + by 2030 gas boilers to be phased out in public buildings. CCC advice sets significant targets for the phasing out of oil fired central heating and gas boilers in public buildings. We suggest that significant work will need to be undertaken to build awareness and communicate timelines for these changes across the construction industry with clear and early guidance given on planning consent deadlines for OFCH/GFCH in public buildings.

RCN agrees that retro-fitting insulation is a sensible & cost effective first step and is particularly important in rural communities where housing stock is older and harder to heat. There may be potential for the development of new community owned businesses or co-operatives specialising in retrofit however this requires certainty on timelines and clear policy direction to enable further development in this sector.

The transition from oil and gas fired central heating to heat pumps, heat networks and district heating in appropriate areas has cost implications in rural communities where there are larger numbers of older owner occupiers who may not have the capital required to upgrade. A combination of low cost loans and or grants will be needed to encourage homeowners to upgrade. RCN suggests that there may be an opportunity to target fuel poor households in rural areas first as the transition from oil fired central heating to heat pumps may deliver greater potential carbon savings per household. The danger exists of a growing far right threat with agitators fomenting concerns amongst people who don't have the resources to make these transitions. Government needs to recognise that not everyone is in the same boat financially and widespread adoption at pace will require targeted and well-designed support schemes for those who need it.

There are considerable workforce challenges/opportunities in developing the workforce required to retrofit renewable heating systems. Again, this needs certainty, continuity and long term policy direction to allow businesses to plan the transition.

Question 12 (b): Buildings Sector Contribution to Net Zero: Do you think that the Northern Ireland Civil Service (NICS) should lead by example in the government estate and phase out the use of fossil fuel boilers as per the CCC advice?

Yes

If no, please provide your reasons and any suggested alternative.:

Question 13. Energy Sector Contribution to Net Zero: Do you think that additional measures (over and above those in the Energy Strategy) should be taken to ensure alignment with the CCC's advice?

No

If yes, please provide examples of additional measures.:

Further development of renewable energy at scale will require new models of ownership. Community owned and developed renewable energy projects will need to be developed to address community concerns in some areas about the location of new renewable energy infrastructure.

Data gaps exist that need to be addressed if the electricity network is to be re-engineered to meet changing patterns of demand and usage. Further development of microgeneration, and rising demand for electricity household levels for transport and heating will lead to fundamental change in how the electricity network is re-structure. A lack of co-ordination and joined up working across Departments on planning issues and engagement with rural communities also need to be addressed to enable further work on the electricity network to happen.

Question 14. Transport Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should follow the transport sector advice provided by the CCC?

No

If no, please provide your reasons and any suggested alternative.:

Increasing rates of active travel are identified by CCC as a key target to reduce carbon from the transport sector in Northern Ireland. There is no acknowledgement of the additional challenges that exist and the need for investment to make this happen in rural communities.

Rural Northern Ireland faces a significant challenge in trying to break the dependence of rural households on multiple fossil fuel powered vehicles? For many rural young people acquisition of a car is a rite of passage which opens up independent access to work, education and leisure opportunities. This is a cultural issue and deeply embedded in NI society. The lower uptake of EVs in Northern Ireland, relative to other parts of these islands, is not just about the deficits in charging infrastructure but is primarily because EVs are seen as too expensive for many driver and used electric vehicle market is still underdeveloped here.

The promotion of active travel and development of public transport in rural communities will have implications for land use planning and local development plans across Northern Ireland.

RCN believe that maintaining policies to facilitate and encourage hybrid working can make a significant contribution to reducing carbon emissions from transport and can improve quality of life for rural commuters. RCN launched research in April, The Policy Landscape for Remote Working and Rural Development in Northern Ireland a Comparative Study which contained a range of recommendations to support the development of remote and hybrid working.

Translink's target of a 50% reduction in emissions from its bus fleet by 2030 will need significant additional public funding as Translink is currently running at a loss and was forced to draw significantly on its reserves last year. Rural Community Transport partnerships which play a vital role in enabling transport for older and disabled people in rural communities will also require support to transition to EVs.

EV infrastructure development is commercially led and further progress is needed on payment enforcement and connection fees. RCN is concerned that rural areas will be left behind in the development of EV charging infrastructure due to the dispersed nature of the population and the level of investment required across the electricity network.

Question 15 - 17

Question 15: Business and Industrial Processes Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should follow the Business and Industrial Processes sector advice provided by the CCC?

No

If no, please provide your reasons and any suggested alternative.:

RCN agrees that buildings regulations will require to be upgraded to raise energy efficiency standards in construction. There is currently a shortage of housing in many rural communities and across Northern Ireland with significant demand for social, affordable and private housing. Modern methods of construction could be used to maximise solar gain in design built to high standards of thermal insulation so minimising the need for heating and reducing fuel poverty. Social housing built to these standards could make a significant contribution to the just transition commitments contained within the Climate Change Act.

Question 16. Waste Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should follow the Waste sector advice provided by the CCC?

No

If no, please provide your reasons and any suggested alternative.:

DAERA focus over the next 5 years is to reduce the amount of biodegradable waste going to landfill. A key factor in achieving this target is the importance of behaviour change and the public education and awareness building needed to make that happen as well as practical steps required in homes and businesses.

Citizen education, engagement and participation needs to go hand in hand if we are to meet emissions reduction targets and RCN believes that co-designing solutions at community and household level will play a key role in making the transition. The Doughnut Economics model has proved to be a useful tool to engage and animate people in local communities across the world to have these discussions and take action. For further information on Doughnut Economics see <https://doughnuteconomics.org/>

Question 17. Fisheries Sector Contribution to Net Zero: Do you think that the Northern Ireland Executive should follow the Fisheries sector advice provided by the CCC?

Not Answered

If no, please provide your reasons and any suggested alternative.: