January 2025

Consultation: Establishment of the Just Transition Commission for Northern Ireland

Rural Community Network (RCN) is a regional membership-based organisation supporting rural communities across Northern Ireland. RCN works with rural communities to address issues relating to poverty, inequality, community and good relations and strives to develop the capacity and skills of groups to articulate their voice at a policy influence level.

RCN has over 200 member groups across rural Northern Ireland. Its Board is also representative of its membership base. RCN's aims are:

- to empower the voice of rural communities
- to champion excellence in rural community development practice
- to develop civic leadership in rural communities
- to actively work towards an equitable and peaceful society
- to promote the sustainable development of rural communities

What is your name?

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Are you representing an organisation, if so, what is your organisation?

Rural Community Network

1. Do you agree with the proposal that the Commission should be established as an Advisory Non-Departmental Public Body with the chair and its members recruited in line with the guidance issued by the Commissioner for Public Appointments.

Yes

Please provide your reasons and any suggested alternative.

Rural Community Network agrees that the Commission should be established as an Advisory NDPB. The reason for this is that it allows for a level of impartiality and independence on behalf of the Commission thus facilitating best practice in relation to advice provision. The Just Transition Committee in both the Republic of Ireland and Scotland are advisory NDPBs.

We do have one slight concern and that is regarding the fact that the Commission would have no real power in that neither the parent Department, nor any other Department, are legally bound to take on recommendations made by the Commission. Over time, if Departments are seen not to implement proposals or take on aboard advice provided by the Commission, it could potentially lead to apathy in relation to engagement and an unwillingness to sit on the Commission. We do take your point regarding the willingness of the Assembly but just something to bear in mind regarding membership of the Commission- RCN carried out a recent membership survey in 2024 and it concluded that our rural membership often feel misunderstood and left out of decision making and that is despite being consulted. Therefore, the Parent Department herein will have a role to play in ensuring a continuing positive ethos and "good will" within the Assembly to ensure a Just Transition. In addition, we would suggest memorandum of understandings between linked bodies in order to avoid duplication for example this could include a Memorandum with the future Northern Ireland Climate Commissioner

2. Do you agree the Commission membership should be between 7-20 members?

Yes

Please provide your reasons and any suggested alternative.

-RCN believe that having membership according to Section 37(4) of the Climate Change Act members would be reasonable. Northern Ireland (2022) members of the Commission must include a representative of each of the following sectors: the agricultural sector; the fisheries sector; academia; trade unions; youth groups; civic society and environmental groups. RCN would also support the inclusion of representatives from the energy, transport and finance/green finance sectors on the JTC. We feel it important that the representatives also have some experience and/or knowledge of reducing greenhouse gas (GHG) emissions, as this is the goal of the both Act and the JTC.

The Just Transition will impact many sections of society. What is important also to note is not all these sections of society will have engaged with each other previously and may even have opposing views. Allowing for higher numbers of membership allows for greater diversity. Navigating this diversity will be an important role of the Secretariat.

In addition to the foregoing, some sections will require more than one member to ensure all voices are heard. For example, we would expect from a rural perspective there is a need to have

more than one agricultural representative. There are multiple forms of agriculture such as dairy, meat, grain, larger and smaller operations as well as the agri-food industry including distribution and processing. In addition, we need to widen that rural narrative, 37% of the population live rurally but only approx. 7% of those living rurally work or are involved in agriculture and so we encourage you to ensure inclusivity and diversity of that rural voice and not to confuse rural with agriculture.

3. Do you agree the Commission membership should meet on average 15 days per yea

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Yes

Please provide your reasons and any suggested alternative.

RCN feel that this is a reasonable level of engagement from the Commission. We do ask however for you to please bear in mind the capacity of the organisations. RCN carried out a recent survey of our membership in 2024 and a key piece of feedback was that our sector feels burned out and that they are running at high intensity. Communication will be key to ensure representatives do not burn out. Notwithstanding this point, a Report by Brenda Kelly for CO3 on the appointment of AIPB reps in the health service states "there is merit in a VCSE sector collective strategic voice" . it also made fundamental recommendations about parity of support and status for those from different sectors. [Brenda Kelly Scoping-Study-Project-Report-June-2024-Full-Report.pdf] RCN are therefore supportive of section 3.6.7 wherein it indicates that, as long as members are not working in another public position, they will receive a daily allowance for their time as well as travel and subsistence.

4. Do you agree that the Commission should be similar to the Scottish model and supported by a small team to provide a secretariat function to allow the Commission to function effectively?

Yes

Please provide your reasons and any suggested alternative.

A Secretariat will be essential to ensure the smooth running of the Commission.
RCN do however have a slight concern about the proposal in that the Secretariat would consist of "seconded staff". As a new Commission and with such tight and necessary targets, continuity and stability will be really important. Staffing this Secretariat carefully and considerately to avoid movement of staff in and out will be important.
We have consulted with our Rural Support Networks on this topic and additionally, RCN sit on the Joint Forum, which operates with a Secretariat, and we concluded that the Secretariat should have relevant skills and experience of the Commission's work.

5. Do you agree that members appointedto the Commission should serve a term of 5 years?

Yes

Please provide your reasons and any suggested alternative.

We are very much at the beginning of the journey in relation to Climate Change and it can take time to get up to speed on terminology and technologies involved in same. A 5 year term allows for a period of stability.

In addition, the guidance of the Commissioner for Public Appointments for Northern Ireland (CPANI) states that, while an appointee may be reappointed for a second term, appointments for the same position should be restricted to two terms so no appointee should serve for more than ten years. [Code of Practice for Ministerial Public Appointments in Northern Ireland | The Commissioner for Public Appointments for Northern Ireland]

6. Do you agree that the Commission would fulfil the oversight function required of it in the Act by reviewing and reporting on the development and implementation of: (a) any sectoral plan published under sections 13 to 21 of the Act; (b) any climate action plan published under section 29 or 51 of the Act; and (c) any scheme established by Regulations under section 31 of the Act.

Yes

Please provide your comments.

7. Do you agree that the Commission would be fulfilling its advice function by: (a) Responding to a Northern Ireland department's request for advice within agreed timeframes. (b) Issuing research and guidance documents for department's to review and consider when developing emission reduction policies.

Yes

Please provide your comments.

8. Should the Commission include representation from the Transport sector?

Yes

Please provide your comments.

RCN believe that the transport sector absolutely needs to sit on the Commission. Due to the variety of transport required in Northern Ireland because of its rural geography, our recommendation is that it include representatives from public transport as well as private transport. This could for example include a group such as the Consumer Council and/or car manufacturers.

RCN sit on the Electric Vehicle Sub-Group and we have previously raised concerns that, whilst we are getting ready to move to Electric Vehicles, the infrastructure to support the charging of those vehicles is not practical or affordable in rural areas. In addition, the technology, as yet, cannot allow for the long journeys carried out by people living rurally and travelling to access work or medical treatment in cities or larger towns.

Furthermore, Rural Community Transport charities such as Easilink and Fermanagh Community Transport need to be included in this conversation. Access to services is a major barrier to those living rurally. This is due to the sheer distance often required for those living rurally to access a particular service as well as the additional rural premium or cost of same. Rural Transport Charities have been a life line in trying to access hospital appointments or remove isolation and loneliness. Easilink, for example advised us that they have taken 6000 people to hospital appointments in Belfast or Altnagelvin from rural areas over the last year.

In addition, Multiple Deprivation Measure Index in relation to access to services show that rural communities, in particular those in the West of Northern Ireland, are significantly impacted. For example, the top 10 most deprived areas in relation to access to services are rural and five out of the top ten are in County Fermanagh. [NIMDM17- with ns.pdf] It is important that those voices are represented as they will bear a significant burden in trying to achieve a Just Transition.

9. Should the Commission include representation from the Energy sector?

Yes

Please provide your comments.

RCN agree that there needs to be representation from the Energy sector on the Commission and preferably, it should be a representative with experience and/or knowledge of reducing greenhouse gas (GHG) emissions.

In addition to having this level of knowledge and expertise to share with other representatives on the Commission, RCN are also of the view that it will be mutually beneficial as the energy sector will also gain from the input of others. An example of how this might be useful is that of a cross border scenario. It can easily be forgotten the hidden complexity of living on the border with the Republic of Ireland. There are houses in NI, situated along the border, using ROI energy such as electricity for example. Cross Border conversations need to be had to ensure a Just Transition

10. Should the Commission include representation from the Financial/Green Finance sector?

Yes

Please provide your comments.

Modelling commissioned for the Climate Change Committee (CCC) Sixth Carbon Budget report [Sixth Carbon Budget - Climate Change Committee] suggests achieving net zero in the UK will give a boost to UK GDP growing to around 2% of GDP by 2030, with an accompanying boost to employment of around 1%. The CCC also states that considering the various economic models and evaluations, the investment programme for achieving net zero "can provide a significant economic boost in the coming years and support the UK's economic recovery."

Further to this, research for the Institute for Public Policy and Research concluded that greater investment in a green recovery and clean, low-carbon jobs could create 1.6 million new jobs over the next decade in the UK, of which over 40,000 could be in Northern Ireland.[Transforming the economy after Covid–19: A clean, fair and resilient recovery | IPPR]

Communicating the many potential benefits of a move to net zero, including: the potential for a long term boost to GDP and employment levels; of reducing energy consumption; of improving living conditions by reducing fuel poverty and improving access to transport all while reducing carbon emissions and saving money is potentially one of the most important roles of the Commission. It is also something our members advise will be required in rural areas- effectively communicating the financial benefits to moving to net zero as presently, with the cost of living crisis, people are struggling to think past their next wage payment let alone plan for the future.

In addition, in regard to finances, there has to be a realisation of where we are in relation to the cost of living crisis and poverty. There needs to be direct conversation between how do we address poverty and achieve net zero in a "just" way and what exactly do we mean when we say "just transition". RCN therefore suggest a representative with knowledge of poverty and/or debt.

11. Are there any other sectors in addition to the Transport, Energy, Finance and those listed in 37(4) of the Act that should be represented on the Commission – and if so, please provide reasons for your answer.

Yes

Please provide your reasons and any suggested alternative.

Rural Communities – In order for there to be a Just Transition, there needs to be an understanding of the scope within rural communities that can

(a) assist with the Transition and
(b) might make the transition more difficult.

There are many examples of community based projects that are already going some way to achieving a transition including community energy projects, wind farms and cooperatives.

There are also many complexities for example, there are high numbers in private rented accommodation of poor quality, the additional travel time and cost to access services in addition with the poor quality roads make electric vehicle planning harder, poor infrastructure such as little or no trains

Border Communities- Living close to or on the border with ROI, throws up complexities that may not always be obvious. There are houses that straddle the border where part of the house is in Northern Ireland and another part is in the Republic of Ireland. There are houses situated in Northern Ireland but require to use electric from Republic of Ireland and vice versa. The centre of a person's life also tends to be in their nearest town, therefore there are villages and rural areas in Northern Ireland along the border where the nearest town might be in the Republic. There are people who live in Northern Ireland and work in the Republic or who are self employed working in both parts of the island. We need a realisation of the fluidity of the border and how this impacts a Just Transition.

Furthermore, the Republic of Ireland are further ahead in terms of a Just Transition and so this shared learning could be really beneficial for Northern Ireland.

Housing . Carbon emissions from homes will certainly need to be considered as part of this process but there is a need to understand what is happening in terms of housing in rural areas in comparison to urban counterparts. Having someone on the Commission who understands those differences and those complexities will be key in trying to address the issues. If we take for example housing stock availability, there tends to be limited options for social housing in rural areas. As such, there is a heavy reliance on the private rented sector to plug the social housing gap. Census Data 2021 indicates that 19% of people living in the rural County of Fermanagh [Fermanagh and Omagh Census Data] live in private sector accommodation as well as 19% in the rural County of Mid Ulster. [Mid Ulster Census Data]

Housing Rights have provided a list of documents which a Landlord in Northern Ireland is legally required to provide a Tenant with [Certificates and paperwork | Housing Rights} and yet, we hear that the level of complaints dealt with by both Housing Rights and the local Advice Sector relating to these documents not being provided is quite high. We are advised that it has been quite difficult to police the private rented sector in terms of energy performance. We are also advised that there are privately rented houses in very poor condition including damp and mould. The families who rent them do not wish to complain because they need a home and fear eviction. With the lack of other options due to the housing crisis, it is the perfect housing storm.

The housing quality issue is not limited to the private sector and RCN are advised through our Rural Residents Forum that Housing Executive Housing are also in need for retrofitting and energy efficiency measures.

Further to this, there is still a heavy reliance on oil heating across Northern Ireland. Again, if we take County Fermanagh, only 2% have a connection to gas- the rest are using oil or other forms of heat such as open fires. [Fermanagh and Omagh Census Data]

Building- It may be worth giving consideration to having a member from the building trade with knowledge of up to date methods of building in an environmentally appropriate way in keeping with achieving these net zero targets as well knowledge of retrofitting.

IT/Technology- A representative from the IT/Technology sector is worth considering, not just because of the growing electricity demands from data centres but also because there is a potentially important role for technology to assist in the monitoring and collection of relevant data and in the reduction of emissions from the various sectors.

Section 75- In keeping with section 75, we also suggest having equality of representation from across the board including youth, older people, people with disabilities, rural people and women. The realisation that a Just Transition may mean different things to different groups of people will be an important factor.

Poverty including Fuel Poverty- as stated above in previous questions

12. Do you agree the Commission should have a power to establish Ad-Hoc Committees or working groups to secure additional knowledge or expertise that may not be available with the Commission.

Yes

Please provide your comments.

This is a fast pace every changing environment and we need to be able to adapt quickly to it if we are to successfully meet our Carbon Reduction Targets. The pace that Stormont moves at generally is extremely slow. Our Rural Community Groups during this consultation pointed out the added risk in Northern Ireland that one party can decide to withdraw from power sharing, thus collapsing the Government, as has happened multiple times throughout the life span of Stormont.

These targets are too important to miss. RCN recommend that the Commission should be able to establish Ad-Hoc Committees to ensure they can keep pace but they could also consider a safeguard be established to allow continued progress and reporting should we have another stage of collapsed government.

13. What do you think the key initial priorities should be for the Commission?

Please provide your comments.

From the outset, we need to have clear parameters on what we mean by a Just Transition and how this is to be effectively communicated.

The ILO Guidelines for a Just Transition towards Environmentally Sustainable Economies and Societies for All highlights the opportunities for job creation, greater equality and sustainability and reducing poverty while increasing social inclusion. The communication of these multiple benefits will be crucial in ensuring the transition is just and supported

[https://www.ilo.org/sites/default/files/wcmsp5/groups/public/%40ed_emp/%40emp_ent/documents/publication/wcms_432859.pdf]

Additionally, an early priority must be to review the plan for funding and the distribution of costs for businesses, households and the Exchequer with clear interdepartmental working and plans. This plan should include how the JTC will work with other relevant bodies including local government.

Further to this, CCC advised that the Just Transition Commission in Scotland should include adaptation within its work, and report annually on Scotland's progress in building climate resilience fairly. It was also recommended Scotland develop and publish an assessment of the characteristics of vulnerability and adaptive capacity and expand public engagement activities under the Scottish Climate Change Adaptation Plan (SCCAP) to put fairness at the centre of efforts to implement its vision of a well-adapted Scotland. RCN would suggest that similar steps should be taken in NI. [The just transition and climate change adaptation March 2022]

We also recommend an initial scoping exercise – where are current services located, what is happening already eg examples of good practice

The policies and approaches of the JTC also need to be agreed at an early stage. Memorandums of understandings created and implemented to avoid duplication of work, ensuring transparency and more effective collaborative working. In addition, as stated above, communication and social dialogue is a key component of any just transition and the new JTC has to be genuinely inclusive. We refer to 2021 QUB report "Mapping a Just Energy Transition in Northern Ireland [https://www.qub.ac.uk/research-centres/media/Media,1174634,smxx.pdf] wherein it highlighted that a common thread running through virtually all international experiences of this type of transition is the need for
(a) long-term planning for sectoral and economy-wide transition,
(b) state-led and coordinated sectoral and civic engagement, and
(c) meaningful, continuous, and bottom-up social dialogue.