

Proposals for Taking Forward NI Climate Change Legislation

Synopsis of Responses to a Discussion Paper

February 2016

Contacting the Department

Introduction

Background

Next Steps

Summary Table of Proposals and Comments/Views

Summary Table with Respondents Comments

Contacting the Department

This document is a synopsis of the responses received to the Department's discussion paper on legislative proposals for climate change in Northern Ireland.

Hard copies of the document can be obtained by using the following means of contact:

E-mail: climate.change@doeni.gov.uk

Write to: Climate Change Unit

Department of the Environment

6th Floor

Goodwood House 44-58 May Street

Town Parks BELFAST BT1 4NN

Telephone: (028) 90254781

This document may be made available in alternative formats; please contact us to discuss your requirements by any of the above-mentioned contact methods. The Department's text phone number (028 9054 0642) has been included to assist the hearing impaired.

Introduction

On 1 December 2015 the Minister of the Environment, Mark H Durkan, issued a discussion paper to key stakeholders on his proposals for climate change legislation in Northern Ireland. The purpose of the discussion paper was to encourage recipients to express their views on the appropriateness of Northern Ireland climate change legislation and the proposed measures with a view to rebuilding the momentum for a Northern Ireland Climate Change Bill.

The discussion paper was posted on the Department's website and was issued electronically to over 150 stakeholders seeking the submission of views by 29 January 2016.

The Department received 65 responses to the discussion paper representing a wide spectrum of organisations and individuals. Of these, 48 (74%) were supportive of legislation, 10 (15%) were opposed and 7 (11%) expressed no preference. A list of respondees and a table summarising the responses is included at Annexes A and B respectively of the synopsis.

All the responses received have been taken into account by the department in finalising this document. The organisational /sector breakdown of responses is as follows:

Organisation/Sector	Number of Responses
Agriculture/Agri-food	8
Business	6
Energy	8
Environmental & NGOs	16
Government/Local	10
Government/Agencies	
Individuals/Others	14
Political Parties/Elected Members	3

This paper provides a general overview of the main findings of those who responded. It is not intended to be a comprehensive report on every comment received, but rather a summary of the key issues raised. The Department would like to take this opportunity to thank all those who contributed to this exercise. A summary table of the proposals and views is included at Annex A and a full list of respondents and a brief summary of their comments is included at Annex B. A full copy of individual responses can be obtained by using the means of contact above.

Background

Climate change is one of the most serious threats we face, not just to the environment, but to our economic prosperity and global security. To ensure that we in Northern Ireland play our part in tackling this global issue the Minister of the Environment, Mark H. Durkan, issued a discussion paper in December 2015 seeking views on the need for climate change legislation in Northern Ireland. The paper:

- provided a background to the climate change debate;
- gave an overview of the outcome and concerns raised as part of the pre-consultation exercise in 2013;
- gave an overview of the progress and developments since the preconsultation exercise;
- presented the latest rationale and policy proposals for Northern Ireland climate change legislation; and
- invited further comments on the need for a Climate Change Bill and its content.

The purpose of the discussion paper was to test current public thinking and encourage views on the appropriateness of Northern Ireland climate change legislation.

Next Steps

The responses to the discussion paper are being considered alongside the advice contained in the recent UK independent Committee on Climate Change report on the Appropriateness of a Northern Ireland Climate Change Act – 2015 update¹, the outcome of the Conference of Parties (COP 21) in Paris in conjunction with the experience gained from previous and ongoing activities to tackle climate change. Collectively, these will produce the evidence to inform why a Climate Change Bill, designed to meet the needs of the people of Northern Ireland, is required. The Minister intends bringing this evidence base to his Ministerial Colleagues before the end of the Assembly period with the aim of seeking agreement to introduce a Northern Ireland Climate Change Bill in the next Assembly mandate.

¹ https://www.theccc.org.uk/publication/the-appropriateness-of-a-northern-ireland-climate-change-act/

Annex A

	SUMMARY TABLE OF PROPOSALS ANI	D COMMENTS/VIEWS		
PRO	POSALS	COMMENTS/VIEWS RECEIVED	No.	%
		RECEIVED		
	A NI Climate Change Bill will make provisions for a long term target to reduce greenhouse	In favour	45	70
	gas emissions	Not in favour	10	15
		No preference or comment	10	15
		Total	65	100
	A NI Climate Change Bill will make provisions	In favour	44	68
	for interim targets to reduce greenhouse gas emissions	Not in favour	11	17
		No preference or comment	10	15
		Total	65	100
	A NI Climate Change Bill will place a duty to set	In favour	43	67
	limits in carbon budgets on the total amount of greenhouse gas emissions that can be emitted	Not in favour	10	15
	in NI	No preference or comment	12	18
		Total	65	100
	NI Climate Change Bill will provide powers to	In favour	44	68
	request specified public bodies to report on their transition towards a low carbon economy	Not in favour	9	14
	and their plans to adapt to the effects of	No preference or comment	12	18
	climate change	Total	65	100
	NI Climate Change Bill will contain provisions	In favour	39	60
	to establish a NI Committee on Climate Change or to designate an existing body to	Not in favour	9	14
	exercise advisory functions should it be	No preference or comment	17	26
	decided that this is appropriate	Total	65	100
	A NI Climate Change Bill will contain a	In favour	38	59
	requirement for NI to obtain an independent assessment for progress made towards	Not in favour	10	15
	implementing the objectives, proposals and	No preference or comment	17	26
	policies set out in the NI Climate Change Adaptation Programme	Total	65	100

Org Pro Leg	Summary Table of Comments by Organisations/Individuals to Discussion Paper on Proposals for Taking Forward NI Climate Change Legislation				
ľ	Name	В	port ill	Summary of comments	
		Yes	No	AGRICULTURE/AGRI-FOOD	
1	Agri Food Strategy Board		√	Not supportive of NI climate change legislation. AFSB express strong concerns and reservations on what is proposed regarding the following issues: Believes the measurement systems for carbon in agriculture are not sufficiently developed yet to allow actions to be effectively measured or base lines calculated. And without measurement it will not be possible to manage a transition to a low carbon economy; Believes the discussion document takes no account of the significant potential for carbon sequestration through improving our grassland and forest management that in turn can actually enhance economic performance and competitiveness of our agri industries; Believes for a truly global response to be effective, the world should produce food in regions with the lowest overall carbon footprint - believes Northern Ireland can be one of those regions, but the outworking of the regional cap proposed will be that the world will be prevented from migrating to locations that can offer the lowest carbon intensity production. A case of policy designed for certain outcomes, by design frustrating those outcomes.	
2	Dairy UK (NI)		√	Not supportive of NI climate change legislation. Dairy UK comments that there is a distinct lack of science to underpin the proposed legislation; that in the private sector anything that is done which does not have a commercial justification simply makes the firm or sector less competitive; and that within the public sector, any push for Northern Ireland specific legislation is an indication that little credibility and relevance is given to current EU and UK legislation. Believes that the reason that progress has been, and will continue to be made in the agrifood sector is because the changes made at individual business level have delivered	

			efficiencies and improved margins. Having legislation with targets would move the focus from efficiency gains to absolute emissions, which, in turn, would be a major barrier to growth. Also believes that NI specific legislation would result in a contraction of the agrifood sector and that production would move to other countries and regions of the world where production systems are less efficient, in terms of GHG emissions, compared to NI.
3	Linden Foods	V	Opposed to the introduction of NI legislation on climate change. Believes: we are already governed by legislation from Brussels and Westminster; further legislation is not necessary and will stifle growth in the agri-food sector; there is a very real risk that one size fits all legislation would serve to disrupt, and slow down the CO2 reductions being realised across the industry. Would strongly encourage the use of a partnership approach, like the GHGIP, across industry as a more effective alternative to legislation.
4	Livestock & Meat Commission		Not supportive of NI Climate Change legislation. In favour of voluntary approach to reduce carbon intensity of food production primarily via the measures contained in the NI Rural Development Programme 2014-2020 and on measuring and monitoring the impact of on-farm efficiency measures. Comments that the red meat industry is committed to this voluntary approach and has serious concerns about the introduction of a climate change bill for NI; these concerns were expressed in previous exercise in May 2013; as this discussion paper has neither provided a business case for, nor an impact assessment of, the need for a climate change bill in NI their position remains unchanged; that legislation is a blunt instrument which will not be as effective as the voluntary approach led by the GHGIP. Believes:- a climate change act that will ultimately shift the focus from efficiency gains to absolute emissions which will thwart; notwithstanding the economic impact of limiting growth, a NI bill would result in production moving to other regions where there are fewer restrictions and where emissions intensity may actually be lower; Under such a scenario, the ultimate impact of a NI bill could be a double whammy of increased global GHG emissions and a reduction in the size of the NI agri-food industry (which is a key contributor to the rebalancing of the NI economy from public sector dependency to private sector enterprise); NI is already well-served by regulation in this area, with legislation enacted in the UK and Europe. Suggests as an alternative to a bill that DOE considers applying the GHGIP template to other areas of industry with a view to delivering tangible benefits in terms of both climate

			change and economic growth.
5	McIlmoyle & Associates	V	Not supportive of NI climate change legislation. Text of response same as that supplied by Dairy UK (NI).
6	Northern Ireland Grain Trade Association	V	Not supportive of NI climate change legislation. NIGTA comments that the Greenhouse Gas Implementation Plan is already promoting a program of measures that is driving nutrient efficiency and reducing GHG Intensity through the 'Efficient Farming Reduces Greenhouse Gases' initiative. Believes a flexible approach based on lowest carbon intensity per kilo of output and factoring in the contribution of farmland to sequestration would create a framework that promotes carbon efficient outcomes. Believes the current industry program supported by incentives in the form of the various Rural Development Program (RDP) initiatives are influencing farmer behaviour and producing environmental benefits in a way that cannot be delivered through regulation.
7	NI Meat Exporters' Association	V	Not supportive of NI CC legislation. In favour of voluntary approach to reduce carbon intensity of food production primarily via the measures contained in the NI Rural Development Programme 2014-2020 and on measuring and monitoring the impact of on-farm efficiency measures. Comments that the red meat industry is committed to this voluntary approach and has serious concerns about the introduction of a CC bill for NI; Believes:- a climate change act that will ultimately shift the focus from efficiency gains to absolute emissions which will thwart; Notwithstanding the economic impact of limiting growth, a NI bill would result in production moving to other regions where there are fewer restrictions and where emissions intensity may actually be lower; NI is already well-served by regulation in this area, with legislation enacted in the UK and Europe. Suggests as an alternative to a bill that DOE considers applying the GHGIP template to other areas of industry with a view to delivering tangible benefits in terms of both climate change and economic growth.
8	Ulster Farmer's Union	1	Not supportive of NI climate change legislation. The view of the UFU that there is sufficient legislation in place, at both EU and UK levels, to provide focus for both the public and private sectors in Northern Ireland. The UFU does not believe NI Climate Change Legislation is necessary and has serious concerns

			about the potential regulative approach being proposed through the introduction of NI Climate Change Legislation.
			BUSINESS
9	ASDA		No comments on specific proposals. Highlights they are committed to environmental best practice. Comments that this is very much driven by the assertion that high environmental performance in their business is not only the right thing to do, but also makes the business more successful and economically sustainable (quotes examples of ongoing activities) and look forward to working with the Department in discussions about any possible future legislation in this area.
10	Chartered Association of Building Engineers, Northern Ireland Region (CABE NI)	V	Supportive of NI climate change legislation. CABE (NI) holds a strong view that NI should adopt a challenging long term emission reduction target and comments that targets would serve as a catalyst for focused investment in research and development. Believes:- a NI roadmap with unambiguous milestones would provide clarity and certainty, enabling all sectors in NI to manage their transition towards cleaner, more efficient and low carbon business processes; inclusion of an obligation on public bodies to report on their transition towards a low carbon economy will ensure all public bodies will engage and thus will enhance public confidence and support; NI would benefit from independent expert panel similar to Prosperity Panel; and there is a significant opportunity for Northern Ireland to grow our 'low carbon' and 'climate change adaptation' sectors. Supports the full implementation of the NI Climate Change Adaptation Programme.
11	Freight Transport Association	V	Supportive of NI climate change legislation. FTA supports the introduction of a Climate Change Bill for Northern Ireland in order to establish an official framework for climate change policy measures and comments that a Climate Change Bill for Northern Ireland will also signal a strong commitment to climate change to a wider UK, European and global audience. Believes that interim targets and carbon budgets should be established and the role of voluntary sector reporting schemes such as the Logistics Carbon Reduction Scheme (LCRS) should also be considered to reduce GHG emissions. The LCRS is a voluntary carbon reporting mechanism for freight operators to record, report and reduce emissions from UK commercial vehicles.

12	NI Food & Drink Association		V	Not supportive of NI CC legislation. Believes:- a voluntary approach is best route forward because there is a lack, currently of good science to underpin the proposals; and there is a lack of a holistic approach i.e. measuring both the GHG we produce and the GHG we sequester to establish a net view; the proposals could lead to moving food production to regions that will pay less attention to GHG output; the RoI approach of working towards carbon neutrality is the correct approach; the proposals would not be efficient or effective for the agri-food sector or our society; andit would add yet another layer of bureaucracy to UK and EU rules.
13	NI Retail Consortium	√ ,		Supportive of the approach taken in the discussion paper and the proposals contained within it and note that these proposals would bring NI in line with Scotland and Wales. Suggests that any interim targets are in line with those under the UK CC Act as this maintains clarity and consistency for our members who operate across the UK; and that targets and advice should be in keeping with recent COP 21 agreement and the EU INDC (intended nationally determined contribution) as this would give businesses long-term certainty over NI's approach to climate change.
14	Royal Institution of Chartered Surveyors	V		Supportive of NI climate change legislation. RICS supports the benefits of introducing a climate change legislative framework in Northern Ireland that takes account of interlocking local factors. Believes robust data and evidence - based policy is essential in providing certainty in private sector investment across the land, property and construction sectors. Comments that a long-term target, in line with the UK Climate Change Act and the Scottish Climate Change Bill, would indicate Northern Ireland's commitment to green investment and the transition towards a low carbon economy.
				ENERGY
15	ABO Wind NI Ltd	V		Supportive of long term target of 80% by 2050, interim targets that have the capacity to provide additional actions or strategies to ensure targets can be fulfilled, setting carbon budgets and provisions for reporting powers on public bodies. Believes:- that a CC Bill will bring additional and necessary certainty to the NI Executive's

			commitment to addressing climate change; climate change and sustainability is becoming increasingly important in decisions made by investors and the NI Executive must ensure that NI is perceived as a green economy; an ambitious, yet achievable, Bill will boost NI's economy from the development of clean technologies and low- or zero-carbon energy; help NI become a world leader in renewable energy deployment; help NI reduce its use of key resources like energy and less dependent on imports of oil and gas reducing security of supply risks and improving sustainability; and bring health benefits —through reduced air pollution; and in maintaining the CCC to exercise advisory functions to ensure that the highest quality advice is available to enable robust, responsive, evidence based policymaking.
16	Bryson Energy	√ ·	Supportive of NI climate change legislation Believes that NI, as a developed economy producing its own share of greenhouse gas emissions should also play its part in taking action to reduce those emissions and that the only way to do this is by having local legislation, targets and methods of accountability in place. There is a strong regional argument too that NI should have its own Climate Bill. Bryson Energy has a particular interest and experience in residential energy and promotes a wide range of insulation and other measures through its <i>Whole House</i> solution.
17	Drumlin Wind Energy Cooperative Limited	√	Endorses and seconds Friends of the Earth's response. Additional comments:-interim tri annual targets are essential to meet the recommended 95% reduction in carbon by 2050; strongly support reporting duties on public bodies; the report of CC adaptation programme in 2019 a long way off, an interim report is recommended; and the renewable energy industry in NI is facing a complete cessation of new projects with the closing of the Renewable Obligation without a replacement, resulting in job losses and locking electricity generation into fossil fuels. NI will be the only part of the EU without a support scheme for renewables. An urgent support scheme for renewables is required.
18	Electricity Association of Ireland Ltd	V	Believes:- it would be best to place the monitoring and governance of long term target in legislation and adopt the target as a non-judicable resolution outside of legislation so that it can be updated and revised in the light of further knowledge or ambition; given the unusually high proportion of agriculture within NI's emissions profile, and the relative difficulty of mitigation within this sector based on current

			knowledge, that NI should adopt concrete and sector-specific, action-based objectives to advance its optimal low carbon pathway, based on modelling data; setting limits in budgets for a small economy could be risky and inefficient; actions under CC legislation should be based on low carbon transition plan focused on sound inventory data and modelling; mitigation of GHG in NI is likely to be more expensive in certain sectors than the norm in UK or in the EU, based on modelling carried out for RoI. Awareness of competitiveness implications should inform any legislation; the plan should contain timed, budgeted actions with accountability in order to drive progress along the pathways contained in the plan and that emerge from the modelling; as the transition requires new thinking, and learning is only now emerging, many policy barriers exist at international level to these new technologies. It is important that, in order to succeed, NI seeks and obtains the necessary flexibilities to pursue these goals in the interest of succeeding in this important transition for the economy; that NI should not unnecessarily impose proportionately higher costs on its economy than in other parts of the UK and Europe, affecting competitiveness and employment; Supports reporting duties on public bodies, appointment of an expert advisory group (or designate to existing body) and requirement for independent progress assessment on NI CC Adaptation Programme Strongly recommends that NI develop its own detailed set of data and modelling to supports its low carbon transition Areas that should be encompassed within low carbon transition plan – focus on the non-traded sector, focus on cheapest sub sectors first, low carbon technologies, timed and budgeted actions, awareness of existing policy barriers, area outside NI control.
19	Energia	V	Supportive of NI climate change legislation Energia comments that the proposed legislation while ambitious presents a significant opportunity for NI to simultaneously grow and decarbonise its economy. And notes that

			NI's unique location within the UK means that it has the potential to further capitalise on its' abundant natural resources should it adopt its own GHG reduction target. Believes that targets encouraging the necessary investment are contingent on a stable policy environment coupled with adequate supports which this legislation will in part deliver.
20	NI Renewables Industry Group		In the main supportive of the proposals. Believes:- that a CC Bill will bring additional and necessary certainty to the NI Executive's commitment to addressing climate change; climate change and sustainability is becoming increasingly important in decisions made by investors and the NI Executive must ensure that NI is perceived as a green economy; an ambitious, yet achievable, Bill will: • boost NI's economy from the development of clean technologies and low- or zero- carbon energy; • help NI become a world leader in renewable energy deployment; • help NI reduce its use of key resources like energy and less dependent on imports of oil and gas reducing security of supply risks and improving sustainability; • bring health benefits –through reduced air pollution. considering the abundant wind resource and future European integration, DOE should consider setting ambitious renewable targets; in maintaining the CCC to exercise advisory functions to ensure that the highest quality advice is available to enable robust, responsive, evidence based policymaking with final responsibility resting with NI Executive.
21	Power NI	V	Broadly supportive of the objectives outlined in the paper; However, noted that it is difficult to comment on practicalities of how carbon reduction targets would be achieved without detail; Have concern that a disproportionate amount of the costs of reducing emissions will fall on electricity consumers – something they are keen to avoid on many levels including the impact on vulnerable customers and the competitiveness of NI business; Query the need to establish a NI advisory body when the majority of respondents (to previous exercise) did not concur and is likely to come at significant cost.

22	Renewable Energy Systems (RES)	7	Supportive of NI climate change legislation. Believes that renewable energy represents the single greatest opportunity for Northern Ireland to continue to progress in its transition to a low-carbon economy, promote energy sustainability and improve security of supply, whilst paying attention to long-term affordability for the benefit of consumers. RES would like to see the introduction of Northern Ireland specific climate change legislation as soon as possible.
			ENVIRONMENTAL & NGOs
23	Chartered Institute of Environmental Health		In the main supportive of the proposals: Believes:- that legislation in NI is vital to create a framework for and commitment to action; the long term target should be ambitious but achievable for NI (in line with the targets set in other parts of the UK, i.e. an 80% reduction by 2050); it may be reasonable to use subordinate legislation to fine-tune interim targets and to set sectoral targets based on evolving scientific evidence and technology; there is a 'policy clash' arising across government in NI - DoE seeks to progress towards the development of a low carbon future in NI, yet simultaneously the UK government and DETI seek to remove renewable energy incentives; reporting powers are very important in terms of government and public bodies' accountability to the public; that undertaking mitigation measures should be a requirement for all public bodies as well as those industries which are reliant upon public monies; that the model of the Sustainable Development Commission could be useful in consideration of a NI Committee on Climate Change. a requirement to obtain an independent assessment of progress towards implementing the NI CC Adaptation Programme would demonstrate a clearer support for adaptation-related action; the relationship between climate change and energy production and use should be elucidated in the Bill; the Bill should have a statement on potential for grants and assistance; Broadly supports the introduction of carbon budgets that would set limits on the total ghg emissions in NI, also taking into consideration carbon sequestration and storage through land management practices.

24	Christian Aid	3/	Concurs with the Committee on Climate Change recent report that local legislation
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			would be appropriate.
			Supportive of long term target informed by and consistent with the latest available
			science. Initially at least 80-95% by 2050 and including a review mechanism;
			interim targets to provide a benchmark to which governments can be held
			accountable; the introduction of long term carbon budgets accompanied by clarity
			in the policies to achieve them in order to generate investor confidence; provisions
			for reporting powers on public bodies and all government depts; the current
			arrangement for the CCC; and an independent assessment on progress towards
			implementing the NI CC Adaptation Programme.
			Believes:-
			A Climate Bill can serve to stimulate a cultural shift in societal behaviour,
			influencing positive behaviour within business, schools, the media, and politicians
			in support of a decarbonisation of society;
			NI should adopt a similar position as RoI - to enshrine the principle of climate
			justice in legislation.
25	Council for Nature	√	Duo div sympative of all the manageds. Deligyes
23		V	Broadly supportive of all the proposals. Believes:-
	Conservation and the		long-term target should be in line with the rest of the UK but with a provision for
	Countryside		adjustment; targets should be challenging but achievable; re reporting duties on
			public bodies, notes the importance of ensuring that such actions and adaptation
			plans are integrated, especially where there are a number of different public bodies
			dealing with the same space or where actions in one locality could impact on
			another;
			accounting measures also have a vital role to play and given our global importance
			for peatlands and our carbon-rich soils it is vital that these are recognised within
			accounting measures;
			the actions of farmers and landowners which contribute to mitigation and
			adaptation in the context of public good also need to be recognised within the
			policy framework;
			legislation also needs to take account of the marine environment and address issues
			there.
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26	Freshwater Task Force	√	Supportive of NI climate change legislation. The Northern Ireland Freshwater Taskforce (FWTF) represents a range of organisations working together to ensure that Northern Ireland preserves and improves freshwater ecosystems by encouraging Government and wider society to adopt a sustainable and integrated approach to water management. The FWTF welcomes the debate on climate change legislation, and support the view that bespoke climate legislation for Northern Ireland is required. The FWTF would direct policy makers and legislators to the Climate Change section within the 2016-2021 River Basin Management Plans which provides an overview of the potential impacts of climate change on our freshwater environment.
27	Friends of the Earth		Believes: developments in climate change science makes the case for a NI Bill more urgent – quotes back up paper/articles; changes in political situation leaves NI even further out on the fringes of political opinion; the economic case for a climate change bill has strengthened – quotes back up papers/articles; NI targets should reflect current state of climate science and should be more stringent that those in the UK Act; and it is imperative that politicians show strong leadership; climate legislation is good for people, the economy and the planet, is essential if NI is to take advantage of inevitable move to a low- carbon global economy and has widespread support amongst various NI sectors and recommended by UK Committee on Climate Change. Recommends targets in the range of 80% reduction by 2030 and 90-95% by 2050.
28	National Trust	V	Supportive of NI legislation and the discussion papers' proposals: for a number of reasons, including: legislation is a clear demonstration of leadership from the Executive and NI Assembly and will provide a much greater impetus for society in NI to focus on playing its fair part in meeting UK-wide commitments; there are circumstances unique to NI in relation to its GHG emissions that mean legislation could be an advantage;

			experience at the UK level and in Scotland suggests that devolved legislation is helpful in underpinning low-carbon objectives by making long-term commitments to reduce emissions, including through providing certainty to business and policymakers; Suggests that there is scope for a NI CC Bill to go further – particularly by providing a legislative basis to address the challenges of climate change impacts on our marine environment and coast, and to manage coastal erosion and change through a co-ordinated approach to shoreline planning; makes clear links between climate change impacts and the need for a land use strategy for NI, and also highlighting the need for a more robust system of environmental governance to enable NI, among other requirements, meet its climate change commitments.
29	NI Council for Voluntary Action		Strongly supportive of the introduction of NI CC legislation and broadly supportive of the proposals. Believes:- that the introduction of a CC legislation would act as a driver for change in NI, not least by requiring government to take a joined-up approach to dealing with this issue; the setting of achievable interim targets makes the final target less daunting and provides an incremental path to eventual success in meeting the final target; reporting duties on public bodies could provide best practice to organisations who are seeking to do similar work; any NI CCC established under the proposed legislation would need to be genuinely independent from government, particularly in the absence of an Independent Environmental Protection Agency; and independent progress assessments need to go further than the NI Climate Change Adaptation Programme as it only specifies action for government.
30	NIEL	√	NIEL broadly supports the proposals contained in the discussion document and believes that; Climate Change Legislation would act as a positive and necessary driver for change in Northern Ireland. Believes a Bill would provide the framework

			necessary to guarantee an integrated and comprehensive approach to climate change mitigation and adaptation, ensuring that Northern Ireland's people and economy realise the benefits of developing a low carbon future, and protecting our infrastructure from inevitable climatic changes.
31	Oxfam Ireland	V	Agrees with the rationale and strongly supports the proposal for NI CC Bill that includes targets. Believes targets established in the legislation should be consistent with the Paris Agreement's objective of "holding the increase in the global average temperature to well below 2 °C above pre-industrial levels and to pursue efforts to limit the temperature increase to 1.5 °C above pre-industrial levels." Strongly recommends that NI legislation should be explicitly based on a Climate Justice analysis.
32	RSPB	V	Supports the proposals contained in the discussion document with the exception of the need for a local panel of experts given the considerable costs that might involve and the existence of the current expertise offered by the Committee on Climate Change.
33	Sustainable NI	1	Supports the proposals contained in the discussion document. Believes that targets should be based on the best available assessment techniques, using NI data; Believes that carbon budgets can provide the certainty to make supportive policy changes and ensure that the milestones to an eventual 2050 target are being reached; Is critical of current mitigation reporting made by public bodies; Favours making provisions for a NI expert panel while, like Scotland, retaining access to the expertise of the Committee on Climate Change; Believes that a set of baselines and indicators developed by ClimateXchange in Scotland could be used to determine whether NI adaptation actions are achieving the desired outcomes and policy objectives, and used to prioritise future interventions.

34	Sustrans	Supportive of:- long term and interim targets - interim targets would allow continual review of how successful NI is in achieving reductions of GHG emissions and allow for a change in actions to keep on course to reach targets; setting carbon budgets and reporting duties on public bodies - given the large public sector in NI, it is essential that government sets the example for the rest of NI and ensure companies such as Translink reduce their carbon emissions by setting targets provides a good example for the transport sector as a whole; the UK CCC continuing to provide good advice to NI; a requirement to obtain an independent assessment on progress in the NI CC Adaptation Programme. Comments - NI CC Bill should contain targets that aim to encourage more people to use sustainable modes of transport and get more people walking or cycling.
35	Trocaire	Welcomes the ambition for NI to position itself as a world leader in carbon reduction; Believes: In establishing a long term target it is important that the level of commitment aligns with the mitigation set out in Paris Agreement; it is important that NI's emission commitments in energy sector align with RoI; there needs to be strong policy coherence across all Government Depts in meeting NI's carbon budgets to achieve legally-binding interim and long term targets; legally-binding long term and interim targets matched with 5-yearly carbon budgets is essential to create necessary environment for investment in and transition to renewable energy at national and community level. Recommends a legally binding long terrn target set at mitigating 95% from 1990 levels by 2050. Supports provision for legally-binding interim targets - propose strong interim targets to facilitate the transition required and to support the necessary investment need to meet the long term target on 2050; powers to request public bodies to report on their transition towards a low carbon economy and their plans to adapt to the effects of climate change; proposal for NI Climate Change Committee. Comments that it is imperative that it is independent, its make up and functions based on existing UK Committee and works closely with UK Committee, experts in other DAs and RoI; proposal for NI CC Bill to contain a requirement to obtain independent assessment for

			progress; proposal to set carbon budgets with review every 5 years; and the establishment of a Climate Justice Fund same as Scotland's. Comments: the current NI Adaptation Programme only specifies actions for Government whereas the National Adaptation Programme (NAP) for England includes actions for other bodies. Trocaire would welcome extension in the scope of the independent research to cover local authorities, public bodies etc in line with England's NAP; The Rol's Climate Action and Low Carbon Development Act includes a requirement that climate justice must be taken into account in preparation of mitigation plans. Scottish Government have also integrated a climate justice approach through the Scottish National Action Plan on Human rights. Trocaire recommends that this approach is similar enshrined as part of obligations in a NI CC Bill.
36	Ulster Wildlife	√	Supports the proposals contained in the discussion document; Believes that policy integration will be essential if mitigation measures are to be successful and that environmental issues should be a strong underpinning principle within all policy development and decision-making processes; Believes It is important that legislation is developed to specifically address the Northern Ireland context with both ambitious and achievable targets that can also provide a platform for sustainable business; Notes that as the issue of climate change continues to gain traction at a global scale, environmental ethics will become an increasingly important consideration in consumer choice and public expectation.
37	Woodland Trust	V	In broad agreement with the expressed sentiments of proposals 1 – 6 in paper. Provides a substantive answer regarding the influence of the natural environment on GHG fluxes. Believes: that sustainable land management presents several major opportunities for Northern Ireland's efforts to reduce GHG emissions, including the adoption of low input, low tillage farming systems, ceased exploitation and subsequent restoration of degraded peatlands, and increased tree canopy; Comments: the arrival of <i>Chalara fraxinea</i> , a fungus that is fatal to European ash, has the potential to radically alter the country's landscape. Ash is overwhelmingly the dominant

			tree species in the many thousands of miles of hedgerows that make up NI's characteristic patchwork field system and occupies a special cultural significance: without deliberate intervention the widespread loss of ash trees will result in a dramatic loss in overall tree canopy. The impact on carbon emissions should be assessed along with the opportunity presented for replacing lost trees in terms of wider species diversity and ecological function. Felled ash could replace fossil fuel use and the systematic replacement of woodland trees, hedgerows and infield trees will enable further carbon sequestration; The UK Government supports the Woodland Carbon Code, which aims to encourage landowners and investors to work together to create new woodlands: the Climate Bill could signal similar support for the Code' The impacts of climate change make adaptation a necessity. This includes enabling wildlife to move through a well connected, permeable landscape of predominantly benign habitats: many land use practices are unsustainable in this context and this will become apparent as weather patterns change. The measures outlined above point towards the sensitive management of land that can simultaneously deliver mitigation and adaptation.
38	Zero Waste North West		Zero Waste North West (ZWNW) <u>www.zerowastenw.org</u> does not specifically address the proposals contained in the discussion document but presents evidence that current accepted waste management practice is not the most efficient way of reducing our impact on the earth and advocates for the role of a Circular Economy/Zero Waste approach in reducing climate warming while also creating new economic opportunities.
		GO	OVERNMENT/LOCAL GOVERNMENT
39	Arc21	V	Sees merit in:- long-term target – however the target must strike the appropriate balance between ambition and challenge on the one hand and being realistically possible and achievable on the other hand; interim targets however seeks greater clarity on whether there would be one or more; carbon budgeting but to be as meaningful as possible this must take into account not only emissions, but also the existing carbon sinks within the environment; reporting duties on public bodies. Suggests extending the provision to appropriate private sector bodies; Comments: legislative provisions will require a regulatory and economic impact assessment; it will also be important to ensure adequate consideration is given to current

			and future environmental legislation particularly those which contain targets.
40	Armagh City, Banbridge and Craigavon Borough Council	V	Supports the proposals contained in the discussion document. Believes: that greater focus must be placed upon the economic benefits of taking carbon reduction action, both in terms of cost reductions where these can be achieved and by negating the need for expensive retrospective action to address the adverse effects of climate change; that a broad consensus of support for climate change actions needs to be built, and that alongside any climate change legislative proposals to engender the support of industry, commuters, businesses, visitors and every resident of NI must be developed through a programme of action by Government.
41	DARD	1	Supportive of a Climate Change Bill but notes that the content and configuration of the Bill are vitally important; Agree that the long-term target should be to achieve the 80 by 50 goal and interim targets are also necessary to help develop milestones that will make reaching the long-term target more feasible; Believe setting limits on carbon budgets is an important element to the low-carbon transition; Agree with the need for additional reporting powers for public bodies. Believe if public bodies are required to report on what they have done to tackle climate change it enables progress to be monitored and makes for a robust level of accountability; Would welcome an independent advisory body. Believe the North needs an advisory body of its own with exclusive focus on northern issues with the authority to demand progress reports from relevant organisations with the body's configuration agreed through discussion across all parties; Agree with requirement for independent assessment on progress on implementation of NI Climate Change Adaptation Programme; Believe for climate change legislation to be successful and to gain widespread support and participation across society it would have to go hand-in-hand with interventions and incentives. Provides examples for incentives in waste management, transportation and agriculture.
42	DCAL Ministerial	√	Broadly supports the proposals for NI Climate Change legislation.

	Advisory Group (MAG) on Architecture and the Built Heritage	Comments that it is important to ensure sufficient discussion of the measures that will be taken to meet the 80% reduction target. Believes more than 50% of CO2 emissions are from buildings and building construction, and in order to meet the 80% reduction there must be a significant change, both in terms of retrofitting existing buildings and changing standards for new construction. Believes this has to be done in a considered way, ensuring that solutions are properly designed and based on locally appropriate solutions. Embodied energy should be reduced by using more local materials and significantly reducing imported materials. Believes there should be a review of current incentives, and of regulations (e.g. Building Regulations) and that the advice of the NI Building Regulations Council should be sought in this matter. Notes that the policy paper "Principles of Sustainable Design Guidance (May 2014)" was referred to in the Government response to the annual progress report of the Committee on Climate Change (CCC), so is already part of NI policy; Believes that consideration should be given to integrating Climate Change Policy into the Briefing & Procurement policies for publicly funded projects.
43	Lisburn and Castlereagh City Council	Believes:- the paper provides 6 definitive proposals on a pathway but provides no actual suggestions on how it intends to achieve the reduction in GHG emissions. Without this information, it is difficult to comment on the impact for the populous or economy of Lisburn & Castlereagh; there is no indication of how we shall make up the predicted shortfall in achieving its present target; the reporting duty on public bodies is information already gathered through other mediums; if independent assessment on progress towards NI Climate Change Adaptation is conducted by independent NI Climate Change Committee NI could be accused of self-policing this issue. Proposes that the Bill making provisions to ensure that in 2050 greenhouse gas emissions are at least 80% lower than the 1990 baseline would appear to be merely pushing back the deadline to a date when none of the current politicians will be in post to justify their actions. However this proposal would bring NI into line with the EU commitment of a 80%-95% reduction by 2050 and would therefore provide consistency across the member states.

45	Newry, Mourne and Down District Council NILGA		Welcome the proposal to introduce specific legislation to NI to address the local contribution to the efforts to minimise the adverse effects of climate change; Agree that NI's particular location offers unique opportunities for the development of green technology and that the agricultural, power-generation and industrial bases differ from other UK regions and therefore that any local climate change legislation should take account of these factors. Also agree that in a global climate system, international, European Union and UK and Ireland policy frameworks must be taken into account so that any legislation brought forward is comparable, equitable and robust in seeking to reduce the adverse effects of climate change; Supports the use of a long-term target to provide certainty to stakeholders about the transition of NI to a low carbon economy. Believes targets must have regard to the global policy framework to achieve reductions; Agrees with the use of interim targets to evaluate progress towards the long-term target but also as a means of determining the economic impact of climate change proposals; Supports the system of carbon budgeting but to be as meaningful as possible this must take into account not only emissions, but also the existing carbon sinks within the environment and how they make an important contribution to carbon reduction; Comments that the Council acts as a civic leader and as such supports the mechanism whereby public bodies shall report on carbon reduction and adaptation matters; Believes there is insufficient information available at this stage on the existing frameworks to form a robust view at this point on establishing a NI Committee on Climate Change and a requirement for independent assessment on progress towards implementation of the NI Climate Change Adaptation Programme; Believes that greater focus must be placed upon the economic benefits of taking carbon reduction action, both in terms of cost reductions where these can be achieved, but also by negating the need for expensive ret
45	NILGA	V	Supports:- the use of a long-term target in line with targets set in other parts of the UK i.e. an 80% reduction by 2050; interim targets and recommends that they should be timed to fully align with the working lifetime of a single government, and included in the Programme for Government, creating

			publicly visible accountability and responsibility to deliver and that they should be placed in subordinate rather than primary legislation, with the provision for setting targets included in the Bill; carbon budgeting but it this must take into account not only emissions, but also the existing carbon sinks within the environment and reporting duties on public bodies. Believes:- there is a potential 'policy clash', where the DOE seek to progress towards the development of a low-carbon future in NI, whilst at the same time the UK government (and DETI) seek to remove incentives for the production of renewable energies. Ultimately, a clear policy direction in NI toward clean alternatives to fossil fuels is needed; industries reliant on public money should also be required to undertake and report on mitigation measures; that greater focus must be placed upon the economic benefits of taking carbon reduction action; the Bill would support the aims of the Strategic Planning Policy Statement to 'reduce emissions of greenhouse gases that contribute to climate change and to respond to the impacts brought about by climate change'. Suggests a multi-agency approach to develop a measurement and monitoring process for climate change adaptation progress based on lessons from Scotland (voluntary reporting system which is becoming mandatory).
46	NI Water	V	NI Water is broadly supportive of the proposals for NI Climate Change legislation and views the protection of the environment as a major priority for the company. Notes that Water NI has invested and will continue to invest significant resources and measures to safeguard the environment. As such, NI Water recognises the vital role climate change legislation will play in protection of the environment; comments that any target set should be ambitious, but achievable and that while NI Water continuously strives to find more innovative, sustainable methods of treatment, any targets set need to take cognisance of the effect of changes outside NI Water's control such as population and economic growth, as well as changes in regulatory standards that NI Water have to comply with, all of which may drive up GHG emissions. Notes that adaptation may eventually be the most important aspect of our response to climate change however, evaluation and measurement of adaptation progress is complex.

				Input however, should be commensurate to the business. Investment of time and resources is required to develop a methodology for adaptation measurement and evaluation that works for Northern Ireland; Believes there may be potential conflict between the ever increasing need to drive water quality improvements through delivery of more stringent treatment and the knock on impact of increasing energy costs to do so, resulting in increased carbon emissions but welcomes the opportunity to engage with NIEA to work together to develop Prosperity Agreements in the future.
47	Rivers Agency (DARD)		V	Not supportive of NI climate change legislation. Rivers Agency considers that the current UK Climate Change Act 2008 provides the necessary legislative cover for NI and that another layer of legislation specific to NI may lead to duplication of effort.
48	Southern Health and Social Care	V		Believes NI should be leading the way on this issue. Supports: long term target - questions use of 1990 baseline, suggest it would be more practical to use data from the last 5 years; interim targets but based on current consumption data; in principle with carbon budgets but questiosn how it would work in practice and its impact on business and the public sector; Suggests powers to request public bodies to report on transition to low carbon economy and adaptation plans would need to be supported by investment in green technologies and clear guidance on what actions can be taken; Comments: there should be an existing body used to exercise advisory functions; Disagree that there should be a requirement to obtain independent assessment re implementation of adaptation programme. Suggests one report should be completed for all UK & Ireland and detail how we compare with rest of EU.
		,	1	INDIVIDUALS/ OTHERS
49	Belfast Healthy Cities	V		Belfast Healthy Cities supports NI Climate Change legislation. The organisation's key role is to fulfil the requirements of Belfast as a World Health Organization (WHO) Healthy City and to act as a link between the city and World Health Organisation (WHO) Europe. Belfast Healthy Cities provides the secretariat to a regional Climate Change and Health Partnership, which is chaired by the Department of Health, Social Services and Public

			Safety; the role of the partnership is to build capacity and share information among organisations in the health sector on the links between climate change and health. Notes the important role of the cross-departmental working group on climate change and agrees that powers within the legislation to request specified public bodies on actions will strengthen the currently voluntary reporting system.
50	Cloughey and District Community Association	1	Supportive of NI climate change legislation. Comments that it is disappointing that the word education is never mentioned in the discussion paper as the association believes that to tackle climate change successfully it is important that everyone affected by climate change has a clear understanding of why action is necessary, why now, what needs to be done and how the necessary changes can bring positive benefits for society and economy. Believes: that so far communication of the issues has given the general population confusing messages; and that the role of community should not be underestimated as it is only with the involvement of communities can we successfully recycle, reuse and reduce.
51	Community Places	V	Believes: long term target necessary to provide more certainty as a basis for business investment. A NI target should be in line with those set in other areas; interim targets are necessary and that early changes are most beneficial and easiest to achieve; that there needs to be a clear policy stance on clean alternatives to fossil fuel; a committee would facilitate greater cross-government advice and working on climate change. Suggests a local committee would be useful in monitoring and reporting on progress on local targets; a Bill should provide for grants and assistance and that support mechanisms are necessary to enable and assist action. Broadly supportive of carbon budgets and powers to request specified public bodies to report on transition towards low carbon economy and adaptation plans;
52	Co-operative Alternatives	V	Supportive of NI CC legislation. Believes a NI Bill could support co-operatively owned energy projects and reward co-operatives focusing on energy saving initiatives that could improve the lives of many still living in fuel poverty in the region.

			Comments: DOE is encouraged to work alongside DETI for a strategy on community energy for NI and commit to the growth of the community energy sector in NI.
53	Mike Coyle		Expresses no opinion on the proposals contained in the discussion document but provides an essay looking at energy issues in NI.
54	Disability Action		No particular views on any of the proposals.
55	Laura Duggan	V	Supportive of long term target per UK and COP 21, interim targets, setting carbon budgets and reporting duties on public bodies.
56	Fossil Free QUB		In the main supportive of the proposals. Believes:- targets should be ambitious but achievable and there should be provisions for the review of interim targets to ensure that implementation is kept consistent with the long term target; there is a 'policy clash' arising across government in NI - DoE seeks to progress towards the development of a low carbon future in NI, yet simultaneously the UK government and DETI seek to remove renewable energy incentives; a service similar to ClimateXChange in Scotland which could support the Assembly as it develops and implements policies climate change could provide a useful template Supports the introduction of carbon budgets that would set limits on the total ghg emissions in NI, also taking into consideration carbon sequestration and storage through land management practices. Suggests:- that a legal commitment is made to refuse any new fossil fuel extraction and/or production projects in NI - a 'keep it in the ground' clause which prohibits the granting of any future permissions (e.g. planning permission or permits) for any such activity in NI; that any NI climate bill should contain a mention of the human rights significance of mitigating climate change, and include the promotion and protection of human rights as a stated motivation for NI acting ambitiously on climate change. Additionally, the human rights impacts of mitigation and adaptation should be reported on as a means of ensuring that a 'human rights based approach' is taken to climate mitigation.

57	Tanya Jones	√	Supports the proposals for NI Climate Change legislation.
58	Landscape Institute Northern Ireland	V	Supportive of NI climate change legislation - as a member of Northern Ireland Environment Link (NIEL) broadly supports and endorses the comments separately submitted by that organization on this topic. Broadly supports the proposals and would urge direct Executive level action as soon as possible to address this cross cutting matter – incorporation within any future Programme for Government combined with creation of primary legislation is considered essential to reinforce collective cross departmental support, effort and delivery.
59	Belinda Loftus	√ ·	Supportive of targets (80% reduction by 2030, and 90-95% reduction by 2050); carbon budgets to ensure accountability and provide clear guidance to businesses; reporting duties on public bodies and independent assessments on implementation of the NI CC Adaptation Programme. Other comments to consider: requirement for consistency and long term planning, making renewable energy available to ordinary people, tackling energy waste, public education, exporting our climate impact and embodied emissions.
60	NI Authority for Utility Regulator		No comment on the proposals presented in the paper.
61	NI Commissioner for Children & Young People (NICCY)		No comment on the proposals presented in the paper.
62	UK Climates Impact Programme - Oxford University	√	Supportive of NI climate change legislation. UKCIP notes that the Paris Agreement is the first international agreement to put the need for adaptation on equal footing with the need for mitigation and that it would be useful that this requirement (and the work related to adaptation of the proposed Northern Ireland Climate Change Committee) be included for consideration and to contribute to this global effort. Believes that it would be beneficial to identify, including in the rationale, the social, economic and environmental benefits to Northern Ireland in addressing the mitigation and adaptation challenges. These could include social and economic development and growth

			(including jobs) related to technological developments and the associated knowledge economy. It also includes addressing security issues and seeking options that in addition to addressing climate change will have benefits for the environment and quality of life. Believes this is consistent with the approach being taken within Prosperity Agreements.
	I a		OLITICAL PARTIES/ELECTED MEMBERS
63	Stephen Agnew MLA	V	Supports the proposals for taking forward NI climate change legislation but disagrees with the option (contained within proposal 5) to designate an existing body to exercise advisory functions in NI; Strongly supports the Department's view that a Northern Ireland Climate Change Bill should be introduced in the next Assembly mandate. Believes we are already seeing the consequences of climate change in NI including flooding which will only increase in the coming years and decades; Notes that on 24 th February 2014, during the Private Member's Motion o Climate Change and Flooding, an amendment by Steven Agnew MLA calling for an NI Climate Bill was passed by the Assembly by 45 votes to 33.
64	Alliance Party	V	Supports the proposals for NI Climate Change legislation. Believes in order to tackle climate change we need to ensure there is a legal framework that embeds environmentalism at the heart of government thinking. A Climate Change Bill is absolutely necessary, so too is mitigating the impact of climate change and switching to less polluting forms of energy production. Comments that the relationship between climate change and energy production should be referred to in this bill.
65	Sinn Fein	V	Supportive of a Climate Change Bill but notes that the content and configuration of the Bill are vitally important; Agree that the long-term target should be to achieve the 80 by 50 goal and interim targets are also necessary to help develop milestones that will make reaching the long-term target more feasible; Believe setting limits on carbon budgets is an important element to the low-carbon transition; Agree with the need for additional reporting powers for public bodies. Believe if public bodies are required to report on what they have done to tackle climate change it enables progress to be monitored and makes for a robust level of

	accountability; Would welcome an independent advisory body. Believe the North needs an advisory body of its own with exclusive focus on northern issues with the authority to demand progress reports from relevant organisations with the body's configuration agreed through discussion across all parties; Agree with requirement for independent assessment on progress on implementation of NI Climate Change Adaptation Programme; Believe for climate change legislation to be successful and to gain widespread support and participation across society it would have to go hand-in-hand with interventions and incentives. Provides examples for incentives in waste management, transportation and agriculture.
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