

DOE Discussion Paper

Proposals for taking forward NI climate change legislation

MAG Response

28 | 1 | 16

DOE Discussion Paper
Proposals for taking forward NI climate change legislation
Ministerial Advisory Group (MAG) Response

28 | 1 | 16

By email to:

climate.change@doeni.gov.uk

1.00 General

- 1.01 The Ministerial Advisory Group (MAG) has a primary role to advise the Minister of Culture, Arts and Leisure on the implementation of the Architecture and Built Environment Policy. Sustainable Development is one of the policy's guiding principles.
- 1.02 In May 2014, as a guide to statutory authorities, commissioning bodies, design professionals and contractors, MAG produced guidance on "[The Principles of Sustainable Design](#)". MAG's opinion is that respect for the environment goes hand in hand with respect for people. A culture which respects people will do all it can to ensure the way we live does not jeopardise the quality of life and life-enhancing opportunities for future generations.
- 1.03 MAG welcomes the opportunity to comment on this discussion paper, and would advise as follows.

2.00 MAG Response

- 2.01 *Proposal 1 – To ensure that Northern Ireland contributes to the reduction of greenhouse gas emissions, the Bill will make provisions to ensure that in 2050 greenhouse gas emissions are at least 80% lower than the 1990 baseline.*

MAG supports this proposal. The legislative proposal will need to show the proposed method of measurement, of the 1990 baseline and hereafter. Clarification is needed regarding which greenhouse gases are to be monitored: just anthropogenic ones?

- 2.02 *Proposal 2 – Interim emission targets will be introduced that are consistent with achieving the 2050 target. Interim targets would help guide the setting of possible carbon budgets in the medium term and assist in evaluating progress being made towards meeting the long-term target whilst ensuring that Northern Ireland remains competitive in a global economic market.*

MAG supports this proposal, but is concerned that the last phrase is an economic "get-out" clause. Clarity is needed regarding terminology such as "carbon budgets".

2.03 *Proposal 3 – The Bill will place a duty to set limits in carbon budgets on the total amount of greenhouse gas emissions that can be emitted in Northern Ireland. Carbon budgets will be set for specified periods of five years.*

For each five year period Ministers will publish a report in advance setting out their policies for meeting the carbon budget for that period.

Carbon budgets would need to be consistent with meeting any 2050 target and any interim targets whilst ensuring that Northern Ireland remains competitive in a global economic market.

MAG generally supports this proposal.

Regarding the phrase “[...]emissions that can be emitted in Northern Ireland,” would the impact of imports and exports be included?

2.04 *Proposal 4 – The Bill will provide powers to request specified public bodies to report on their transition towards a low carbon economy and their plans to adapt to the effects of climate change.*

MAG supports this proposal but suggests there should be clarity on which public bodies should be required to report.

MAG suggests that in addition to all Government departments, all local authorities and formerly statutory bodies such as NI water, energy companies and transport bodies like Translink should also openly declare their targets & performance.

The information should also be openly shared, at an agreed frequency.

2.05 *Proposal 5 – The Bill will contain provisions to establish a Northern Ireland Committee on Climate Change or to designate an existing body to exercise advisory functions should it be decided that this is appropriate.*

This is an important proposal. Currently, we understand, DOE NI generally follows what the UK committee on climate change says.

<https://www.theccc.org.uk/about/structure-and-governance/committee-on-climate-change/>

As stated in the Minister's foreword, it is vital that NI has its own climate change legislation. Logically a separate NI committee on climate change should be appointed, with transparency on the appointment of members and Chair. MAG recommends that NICCC should not be delegated to any existing body.

MAG also recommends that the NI Committee on Climate Change should have close links with the Irish Republic: as suggested in the discussion paper, climate change issues are very much cross-border (and beyond).

2.06 *Proposal 6 – The Bill will contain a requirement for Northern Ireland to obtain an independent assessment for progress made towards implementing the objectives, proposals and policies set out in the Northern Ireland Climate Change Adaptation Programme.*

MAG supports this proposal, subject to how an independent assessment would be procured. There are tangible targets that can be assessed, as well as the intention to "make the transition towards a low carbon economy and a more sustainable & just society."

The current proposals do not cover how to ensure social equality.

3.00 Other Comments

- 3.01 MAG considers that it is important to ensure sufficient discussion of the measures that will be taken to meet the 80% reduction target. This is entirely absent from the legislation proposals.
- 3.02 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. This has to be done in a very carefully 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.
- 3.03 There should be a review of current incentives, and of regulations (e.g. Building Regulations). The advice of the NI Building Regulations Council should be sought.
- 3.04 Reference should be made to the MAG's policy paper "Principles of Sustainable Design Guidance (May 2014)". This was referred to in the Government response to the annual progress report of the Committee on Climate Change, so is already part of the NI policy.
- 3.05 Consideration should be given to integrating Climate Change Policy into the Briefing & Procurement policies for publicly funded projects.
- 3.06 Consideration should be given to integrating Climate Change Policy into Planning guidance for significant developments.
- 3.07 It is important that the MAG sustainable design guidance should be a basic policy document adopted as part of the Climate Change Bill provisions:

<https://www.gov.uk/government/publications/government-response-to-the-sixth-annual-progress-report-of-the-committee-on-climate-change>

Rachel Bevan

MAG Member, Chair of MAG Sustainability Subgroup