

Tom White

This is on behalf of Belcoo Frack Free.

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I thank you for this opportunity to respond to this climate change bill and hope that amendments can be made to the framework bill so that it can be used to close some loopholes that remain open - eg the licensing of petroleum exploration and extraction in Northern Ireland.

I note the Discussion document for the original bill states it's unlikely that Northern Ireland can reach a net zero target by 2050 "due to the characteristics of our society, economy and infrastructure" and in that nutshell is the real diabolical truth of our political failure.

IT is almost as if DAERA are wishing this to be the case. Has DAERA looked at the potential flooding maps yet ? Large areas of Belfast and large areas of London/Derry down to Strabane are under water if we continue in the manner we're going. Similarly the levels of the Erne rise significantly. And much of our sewage outflow is built with regards to current water levels. A few inch rise is enough to cause major issues for much of Northern Ireland's population. There seems to be a notion that this will not affect many people but as the models are refined many times the date at which events happen, is brought forward. Even using the baked in flooding with 1.5C we see significant flooding in Northern Ireland.

<https://dfi-ni.maps.arcgis.com/apps/webappviewer/index.html?id=fd6c0a01b07840269a50a2f596b3daf6>

There is an issue that the Department in charge of our response to legislation is also the Department in charge of Agriculture and indeed the Minister is himself a member of a farming lobby group. We need the creation of an independent autonomous body able to bring forward this legislation, especially now we are without the oversight of the EU.

Elsewhere, eg the Department for Economy has a policy to exploit Northern Irelands oil and gas reserves in an expeditious manner whilst also simultaneously having a policy whereby it must promote gas under Article 14 of the Energy (NI) Order 2003, which was later amended by the Gas and Electricity (Internal Markets) Regulations (NI) 2011. Despite the Assembly calling for a prohibition on petroleum licensing this Department has dismissed the Assembly's wishes.

I go back again to the line that we can make these targets and we can't make them and am truly aghast as it would seem this is the latest version of climate change denial and to my mind epitomises the Government's response to climate change (and other Government responses to climate change). Just to be clear the message seems to have been

1. Deny climate change exists
2. Deny fossil fuels cause climate change

3. Deny humans cause climate change
4. Accept climate change is caused by Humans
5. Argue about how much of it is caused by Humans and by Nature
6. Argue how much of the Human caused climate change is caused by Farming/Fossil Fuels etc..
7. Say Look we're on your side here but we doubt if setting targets is the right way to go about it
8. Well OK you're right that we need to set targets, but bear in mind we don't think they're achievable.

I don't know what bit of 'EMERGENCY' of 'CRISIS' needs to be re-emphasised here.

It is imperative we go further than Net Zero. Net zero in itself is also a dangerous concept as it affords greenwashing and it affords countries to offset carbon production and consumption and that's before we start with where a products emissions are counted from - and assigned to.

Eg.

<https://theconversation.com/climate-scientists-concept-of-net-zero-is-a-dangerous-trap-157368>

One thing climate change bills can do is to set limits, make them mandatory but they need to be imbedded into other legislation. For instance we are building out fossil fuel infrastructure in the form of gas networks in Fermanagh, when the case for gas as a transition fuel was disproven over 10 years ago (Howarth et al).

WE are in a climate emergency and in a crisis but Government is still stuck in neutral.

I believe the bill needs to ensure targets are mandatory, and there needs to be further amendments to the bill to start to implement areas such as prohibition on petroleum licensing and a further prohibition on new fossil fuel infrastructure. Without these measures no target will be achievable. There doesn't seem to be a coordinated approach across government and across the tiers of Government - eg Belfast city council allowing taxi drivers into cycle lanes. The build out of gas networks in Fermanagh being lauded as tackling climate change by FODC and SGN alike.

Even mixing of natural gas and hydrogen has issues with emissions, a 5% mix of H2 will only reduce emissions by 1.6% for example because of the calorific density of H2 by volume.

As our emissions require further and further cuts, there are going to be sectors which will have to compete for their share of the emissions cap. People will want to heat homes etc.. but currently it looks like we're going with a fossil fuel transition to gas approach rather than direct to heat pumps approach. I can see Departments making the phony argument then that home produced fossil fuels are required rather than imported ones. While the real argument is why are we using gas and calling it a transition fuel when it has long been discounted as such. With regards to the argument on new local sources of fossil fuels, the IEA (which is ordinarily pro fossil fuel industry) has stated there should be no new licensing of oil and gas if netzero by 2050 to be attained. <https://www.iea.org/reports/net-zero-by-2050>

Agriculture will be another sector fighting for its share of the emissions pie. By producing our own food we lower emissions via food miles. However to do this in a sustainable manner would require us to branch out into greenhouse cultivation and grow lamps. It would require us to diversify from the intensive animal (poultry/Beef/Dairy/Pig) farm model and more to a cultivation type model. IT also requires us to look at reforestation of our land and ensuring that any such forestry is native or multi-species rather than the mono-culture currently adopted. Yes we can use bio digestion in small scale manner but more wind and solar with storage is probably the easier option to integrate into the grid. Again agricultural policy with respect to intensification, and also with respect to clearing of land needs to be looked at and so we may find hill farmers becoming more a custodian of land with active measures such as rewilding and tree planting to help alleviate rainfall as much as CO2 sinks over time.

In all of this we need to look at the all-island economy. If there are differing standards this will cause issues in some fields eg agriculture. If there are different non-optimised energy grids this will cause (as it does today with huge dumping of wind generated energy) lots of inefficiencies in the system. Ie by treating Ireland as one island economy we can make the progress towards net zero quicker and in a less painful manner, allowing richer parts of the island to subsidise poorer parts. It also requires planning though for if NI is exporting wind energy to RoI then hillsides and scenic places in NI come under threat from turbine expansion. In particular there are different transboundary oil and gas licensing rules in place. We believe that all petroleum licensing should be stopped across the island and leaving NI with its licensing regime in place threatens many along a transboundary shale field here.

My final thoughts are while this is a crisis, there are opportunities in this crisis. NI is a world leader re wind technology. The grid here is one of the most integrated and the engineers have vast experience in both integration of wind and solar and also management of same. Our education system is still linked to fossil fuel industry but even that is changing - eg. Calgary stopping oil engineering courses (<https://twitter.com/350Canada/status/1413122113909760000?s=20>) We need to be looking at how we build the skills for the future into our education system today.

ENDS.