

CALL FOR EVIDENCE AND VIEWS ON THE CLIMATE CHANGE (NO 2) BILL RESPONSE 30 September 2021

Introduction

Sustainable NI works with Northern Ireland's public sector to inspire, influence and inform action on sustainability and climate change. Through our network, we support and empower public sector collaboration to accelerate action on climate change and deliver a sustainable future for all.

Summary

Sustainable NI would like to encourage the movers of both the Climate Change (No. 1) Bill and the Climate Change (No.2) Bill to come together and amalgamate the strongest elements of both Bills to produce a single comprehensive Climate Change Bill that will achieve approval in this Assembly term.

We recommend the adoption of a science based target that seeks to reduce Northern Ireland's overall contribution to global greenhouse gas emissions at a rate consistent with limiting the global mean temperature increase to 1.5 degrees Celsius compared to pre-industrial levels; in line with the requirements of the UNFCCC and the Paris Agreement.

This why we support the overarching carbon reduction target in the Climate Change (No. 1) Bill of Net Zero by 2045, or 2050 at the latest.

If the target proposed in the Climate Change (No. 2) Bill were to be adopted, the Bill will quickly become out of date and an amendment to the legislation will be required soon after to 'upgrade it' as has been the case in both the Republic of Ireland and the UK, due to increasing public demand for stronger government ambition around climate change.

Furthermore, both Bills should be informed by an independent economic impact assessment of the costs and benefits of action versus no action. These assessments should look at:

- The impact of a Net Zero by 2045 target on the NI Economy – setting out the net costs of decarbonisation relative to the projected costs of global warming locally (under a +1.5°C 'best case' warming scenario, i.e. if every country were to adopt targets aligned to the goals of the UN Paris Climate Agreement)
- The impact of an 82% cut in GHG emissions by 2050 on the NI Economy – setting out the net costs of decarbonisation compared to the projected costs of global warming locally (under a 2 - 3°C global warming scenario, i.e. if every country were to adopt targets that are not aligned to the goals of the UN Paris Climate Agreement)
- The economic impact of doing nothing (under a business as usual global warming scenario, without any mitigation measures)

We believe a local economic impact assessment will come to the same conclusions as the Stern Report (2008)¹. The Stern Review's main conclusion was that the benefits of strong, early action on climate change far outweigh the costs of not acting. According to the Review, without action, the overall costs of climate change will be equivalent to losing at least 5% of global gross domestic product (GDP) each year, now and forever.

The Committee on Climate Change has also been clear on the significant economic benefits that will be created by achieving net zero GHG emissions, stating that: "the costs of the transition (including

¹ Stern, N. H. 2007. The economics of climate change: the Stern review. Cambridge, UK: Cambridge University Press.

upfront investment, ongoing running costs and costs of financing) will be less than 1% of GDP over the entirety of 2020-2050, with a net boost to GDP overall.”

It is imperative that our politicians show strong decisive leadership in this time of crisis. The arguments in favour of an ambitious Northern Ireland Climate Change Bill are supported by the most up-to-date science, economics, and ethics. Strong climate legislation is good for people, good for the economy, and good for the planet.

Naturally there are concerns about the short-term impacts of the net-zero transition, in particular on the manufacturing and agri-food sectors as mitigation of greenhouse gases in these sectors will be particularly challenging. However economic studies show that unmitigated global warming will be harmful for all sectors, in particular the farming sector which depends heavily on a consistent climate for crop and fodder production. It would therefore be counterintuitive to set weaker carbon emission targets on the basis of protecting the economy, if the result of this action will be harmful to the economy long term.

The Climate Institute's latest in-depth analysis² of expected global GDP impact by 2050 under different scenarios compared to a world without climate change revealed:

- -18% GDP if no mitigating actions are taken (3.2°C increase);
- -14% GDP if some mitigating actions are taken (2.6°C increase);
- -11% GDP if further mitigating actions are taken (2°C increase);
- -4% GDP if Paris Agreement targets are met (below 2°C increase)

Policy makers must evaluate the economic risks to Northern Ireland of delayed or weak climate action on the local economy and on society as a whole, not just the short term economic impacts on ‘hard to abate’ sectors.

We have set out a summary of the similarities and differences of both Bills, and elements that we believe are missing from both.

Key Differences: Climate Change [Bill no. 1](#) (Private Members Bill) vs [Bill no. 2](#) (DAERA Bill)

Key Features	Bill no. 1 (PMB)	Bill no. 2 (DAERA)	Notes
Climate Emergency	✓	✗	
Science-based Net-Zero target	✓	✗	<p>Bill no. 1 “net-zero carbon” means a net reduction of greenhouse gas emissions by at least 100% from the 1990 baseline</p> <p>Bill no.2 By 2050 at least 82% By 2040 at least 69% By 2030 at least 48%</p> <p>*Science based targets ensure emission reductions are on a trajectory consistent with the goals of the UN Paris Agreement i.e. to keep global warming below 2C from pre-industrial levels.</p>
Carbon Budget	✓	✓	<p>Bill no. 1 details how carbon budget will be administered. Both bills include emissions from shipping and aviation within the scope of carbon budgets.</p>

² <https://www.swissre.com/media/news-releases/nr-20210422-economics-of-climate-change-risks.html>

Nitrogen Budget	✓	✗	A carbon budget is the most basic measure that can be put in place. The effects of climate change are seen through other measurable indicators (soil, air, water quality and biodiversity loss). Excess nitrogen from fertilizer and manure pollutes water and air, depletes atmospheric ozone, and harms plants and animals. Excess nitrogen can also react to become nitrous oxide, a greenhouse gas that is <u>300 times more potent</u> than carbon dioxide.
Climate Action Plan	✓	✗	
Sectoral Plans	✓	✓	Bill no. 2 Department (DAERA) report comprising other Department's proposals and policies for Carbon Budget Period
Annual Reporting	✓	✗	Bill no.1 Input from NI Climate Advisory Body required Bill no.2 a. Interim report within five year budgetary period b. It must respond to points raised by the Climate Change Committee
Public Body Climate Change Duty	✗	✓	Bill 2 includes provision for Climate change reporting by public bodies, but the Duty could be extended to include other environmental sustainability metrics
Climate Commissioner / NI Climate Office	✓	✗	Independent NI oversight: establishes the office of the Climate Commissioner – can take advice from a wide range of advisory bodies (not just the CCC). No powers to penalise
Just Transition Principals	✓	✗	Section 8 Bill no. 1
Transboundary Considerations	✓	✗	
UK Climate Change Committee as sole advisory body	✗	✓	
Non-regression principals	✓	✗	
Missing from both Bills			
Sectoral Targets	✗	✗	Sectoral targets ensure that the burden of decarbonization is fairly distributed across all economic sectors (fair carbon budgets).
Climate change adaptation targets and plans	✗	✗	Bill no.2 includes adaptation in scope of public body reporting duty. Department must prepare a response to CCC adaptation programme reports. No further adaptation requirements above what is already required of NI government under Section 60 of UK Climate Change Act (2008).
Delivery body to oversee and support the climate transition	✗	✗	Provisions for Climate Office in Bill no. 1 do not extend to policy delivery and support.
Dedicated Minister and Department to oversee the climate transition	✗	✗	Northern Ireland is the only part of the UK and Ireland not to have combined energy and climate change policy portfolios

Citizen's Assembly on Climate Change	✘	✘	
Targets to protect and restore nature	✘	✘	There is currently a separate Nature and Environment Restoration Bill, sponsored by Dolores Kelly MLA.
Considers NI's ecological footprint overseas (e.g. investments, supply chains)	✘	✘	
Financial provisions	✘	✘	

There is therefore scope to strengthen both of these Bills. We believe the NI Climate Change Bill must have the following components:

- (1) A net zero target for GHG emissions, preferably by 2045 or earlier but no later than 2050
- (2) A requirement for Climate Action Plans (CAPs) and carbon budgets for all sectors to ensure carbon budgets are administered fairly
- (3) A mechanism for independent scrutiny based in Northern Ireland through a Climate office and Climate Commissioner
- (4) Provision for a just transition which will guide the way sectors move to net zero
- (5) A Climate Change Duty on Public Authorities equivalent to the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019
- (6) A dedicated Minister and Department to oversee the climate and energy transition
- (7) A delivery body to oversee and support the climate and energy transition

Consultation Questions

1. The Bill Objectives

In order to have a good chance of staying below a 2°C temperature rise, the planet as a whole is limited to around 800 billion tonnes of CO₂ equivalent (GtCO_{2e}). If we are to stay below 1.5°C, the preferred target in the Paris Agreement, we cannot emit more than about 400GtCO_{2e}. Northern Ireland's fair share of this limit is around 92million tonnes of CO₂ equivalent (MtCO_{2e}). According to the most recent greenhouse gas statistics (1990 – 2019) Northern Ireland is emitting over 21MtCO_{2e} per year. At the current rate Northern Ireland would exceed its fair share of emissions before the end of this decade (by 2030).

Northern Ireland's per capita emissions are higher than the UK average, accounting for 4% of the UK's total emissions. In addition, Northern Ireland's emissions are falling significantly lower than the UK average, achieving just 18% reduction compared to the UK's 44%. If Northern Ireland is to do its fair share in tackling climate change, there is no room in the carbon budget for new fossil fuel exploration, investment or infrastructure. The IPCC is very clear in communicating the scientific consensus that we must make a rapid transition to a zero-carbon, or nearly zero-carbon, society as soon as as possible. If we do not, the human and economic costs of inaction (i.e. from extreme weather caused here and around the world) will be devastating and will far exceed the costs of mitigation (i.e. eliminating greenhouse gas emissions).

It is important to get the trajectory of emissions reductions right. That means making rapid and steep cuts early. When cuts in emissions are delayed, they become less effective at halting global warming due to complex feedback loops in the climate system. Ambitious emissions reductions targets in legislation is essential in order to set the framework within which all policies and plans are made to ensure the required emissions trajectory is achieved.

The inclusion in the Bill of a series of emissions reductions targets, 2030, 2040, and 2050, is a useful mechanism for ensuring a phased reduction in emissions. However, the specific targets included in the Bill are inadequate and fall short of a fair contribution to the UK-wide or indeed international effort to tackle climate change.

Northern Ireland remains the only part of the UK or Ireland with no binding greenhouse gas reductions targets. Scotland, Wales and the Republic of Ireland have not only had climate legislation in place for a number of years, but they also have recently amended existing legislation to show more ambition in reflecting the urgency of the climate crisis and the need to do more. Northern Ireland cannot be the only part of the UK without its own net-zero target.

Based on the most up to date scientific evidence, the UK Government's target of net zero by 2050 actually falls short of the level of deep emission cuts that are going to be necessary by developed countries in particular to limit global warming by 1.5 degrees. At a minimum, Northern Ireland must have its own net zero target and because of its failure to bring forward climate legislation years ago, it must bridge the gap in emissions reductions and make up for lost time. Net zero by 2045 is achievable, and with more ambitious measures, net zero earlier than 2045 is possible. Research from the Tyndall Centre for Climate Change Research demonstrates Northern Ireland could have a zero-carbon energy system by 2042.

The IPCC's 6th Assessment Report IPCC report has made it clear that the highest possible ambition must be implemented by every country to avoid catastrophic climate breakdown. Northern Ireland must recognise its role as a key emitter of greenhouse gas emissions and adopt the same level of climate ambition that is required by the most up-to-date science, as set out in the IPCC report. A net zero target by 2045 is consistent with the best science. Anything less will not suffice.

Carbon budgets are a key indicator of the extent to which we are meeting targets however there are other indicators which should be included in similar budgeting mechanisms. For instance, Nitrogen budgets should be included.

In addition, biodiversity decline is a key indicator of climate change. Any resulting climate change legislation for the Northern Ireland should reflect the importance of biodiversity as a key performance indicator in the battle against climate change and reflect this in the legislation.

This provision references use of the CCC as the sole advisory body on matters pertaining to the legislation. While CCC advice is welcome, it cannot be the only determining advisory body that advice is taken from in relation to what poses as a complex, local and global problem. The CCC is limited to considering Northern Ireland's contribution to UK targets only.

There is a very strong argument that Northern Ireland urgently requires an independent oversight body capable of auditing compliance with climate legislation and in doing so assimilating a wide variety of bona fide climate advice into stand alone guidance for Northern Ireland - taking into account our unique biogeographical and economic circumstances, relative to the island of Ireland, Europe, and the UK. Northern Ireland is a small country, with a small population. It should be possible to be flexible, agile, and ambitious in this regard.

2. Emissions targets

The Bill sets greenhouse gas emissions reduction targets for 2030, 2040, and 2050. This is a useful mechanism for ensuring there is a phased reduction in emissions over time. The specified emissions reductions targets, however, do not reflect Northern Ireland's historic or current contribution to global greenhouse gas concentrations.

The caveat "at least" provides flexibility to go beyond the specified targets, but it does not represent the strongest possible ambition that is demonstrated in comparative jurisdictions globally, in the rest of the UK and relative to the Republic of Ireland. Net Zero based on the most up-to-date climate science is the only long-term target that is acceptable, and it follows that if a devolved government has the competency to set a Net Zero target, then it should.

Scientifically, the greenhouse gas emissions reduction trajectory is the most important element of any emissions reductions plan. A net zero target, however, will provide the policy impetus for all policies and plans that will stem from legislation. Politically, a net-zero target based on the best science is important, as it leaves no room for doubt about the government's commitment to tackling climate change head on.

It is unlikely that a weak, caveated target of "at least 82%" will encourage the adoption of the technologies, policies, and behaviours at the scale and speed necessary to protect citizens from catastrophic climate change. Northern Ireland has been without climate legislation for many years while other countries are now increasing their climate ambition based on the success of their climate policies. If we do not set the same pace, we will be left behind. There are many economic and social opportunities from the green economy that Northern Ireland can capitalise on if we embrace the change. The terminology "at least" does not stir up ambition and transformation. If anything, it may reduce investor confidence in zero-carbon solutions as it shows a lack of commitment.

As previously mentioned, research from the Tyndall Centre on Climate Change Research demonstrates that it is possible for Northern Ireland to achieve net-zero emissions by around 2042.

Much of Northern Ireland's economic policies are based on exploiting global markets by exporting goods and attracting international tourism. This has an ecological cost. Despite our modest population, in terms of emissions per capita Northern Ireland produces the equivalent of 11.3 tonnes of CO₂ per person compared with a UK figure of 6.8 tonnes of CO₂ per person and the worldwide average of 4.79 tonnes of CO₂ per person. As a result, Northern Ireland is ranked as one of most carbon intensive countries in the world. If Northern Ireland is serious about being a global player, then it must consider its global impact. Basing carbon reduction targets on the contribution to UK emissions alone while simultaneously positioning itself as a global economy is somewhat contradictory. Either Northern Ireland is a small subset of the UK or it is a global economy. If Northern Ireland is a global economy then emissions reductions must be based on a global fair share contribution.

3. Power to Amend Targets

The mitigation of climate change is everyone's responsibility. As such, every climate related decision must be as accountable as possible. This ability to amend legislative ambition depends too much on "affirmative resolution". Only the department may propose a change and this may only be ratified by the Assembly. Under this regime, the Assembly does not get any wider forms of scrutiny to propose its own changes - it can only ratify what is put before it. This flies in the face of democratic accountability which underpins any climate legislation.

4. Carbon Budgets

The proposed Carbon Budgets are a key element of the Bill. The targets establish the direction of travel, but the Carbon Budgets will set out the precise route. If we are to keep global temperatures below dangerous levels we must make rapid cuts in emissions based on strict carbon budgets.

However, Carbon Budgets alone don't provide enough detail. Climate Action Plans would provide the details necessary to set sectoral emissions targets. Without the guidance set by the Climate Action Plans there is a real risk Northern Ireland's response to the climate emergency will remain disparate, unfocused and inadequate.

As previously mentioned, Carbon Budgets are just one mechanism for ensuring a just transition. Other mechanisms must be provided.

5. Progress Reporting

While regular reporting is crucial, accurate scrutiny of progress reports is equally vital and we believe Northern Ireland needs a comparative independent watchdog report running in parallel, commenting on the validity of any executive report and its compliance with any overarching climate objectives to allow independent assessment of its merits. Climate change is a problem defined and quantified by science. It is crucial that science provides constant oversight of the policy response as well.

6. Independent Oversight

The Bill proposes that independent oversight can be achieved through the Climate Change Committee (CCC). The CCC is an internationally respected expert body. There are, however, a number of problems with relying on advice from the Climate Change Committee alone.

I. The question asked

The Climate Change Committee responds to the question asked of it. For example, most recently the Committee was asked by the Minister for advice on how Northern Ireland could make an equitable contribution to the UK's net-zero target. The Committee was not asked to layout a pathway to net-zero for Northern Ireland, nor asked how quickly Northern Ireland

could reach net-zero. There is a built-in assumption in the question that Northern Ireland can only, or will only, contribute to the UK's target and it is premised on a business as usual scenario in the agriculture sector. In other words, the response was constrained by the parameters of the question. As both Scotland and Wales have demonstrated, Northern Ireland can choose to set its own target. Responsibility for all the policy areas central to climate action are devolved. Northern Ireland does not have to simply tag along behind UK Government policy.

II. Assumptions underpinning the UK target

There are several assumptions underpinning the rationale behind the UK net-zero target that need to be challenged. Analysis by Friends of the Earth UK showed that net-zero by 2045 is achievable, even given the underpinning assumptions. Furthermore, assumptions used in CCC modelling are challengeable, and a more ambitious target is possible when policy parameters are varied. For example, there is no technical reason why Northern Ireland couldn't invest in the electric grid to facilitate a rapid, wholesale shift to electric heat. There is no technical reason why a programme of public works to increase energy efficiency in homes and public buildings can't be implemented at speed. Indeed, the Assembly already endorsed such a programme in the Green New Deal. It was never implemented though, and the funds were used for a boiler replacement scheme instead.

A report from the Tyndall Centre for Climate Change Research presents an argument that Northern Ireland's fair contribution to the UK's commitments under the Paris Agreement is net-zero by 2042. The report further lays out a trajectory to zero-carbon for all energy use within devolved responsibility. Energy use (electricity generation, heating, cooking, industry, and transport) accounts for the vast majority of Northern Ireland's CO₂ emissions. If this ambitious carbon budget was adopted a target of net-zero by 2045 would become more achievable.

III. Fair share

Both the target recommended by the Climate Change Committee and the target recommended by the Tyndall Centre are based on a fair share principle. However, the CCC's recommendation is based on a fair share of UK target that is not a fair share of global emissions reductions, whereas the Tyndall Centre's target is based on a fair share of what is required globally under the Paris Agreement. Furthermore Northern Ireland contributes more carbon emissions on a per capita basis, than the UK average. The Tyndall report points out that at current emission rates Northern Ireland will expend its entire fair share budget before 2030. It is not fair, therefore, to allow Northern Ireland to reduce its emissions at a slower rate than the rest of the UK, if our contribution to climate change is disproportionately higher on a per capita basis.

Through the proposed use of Negative Emissions Technologies and carbon offsets, the CCC effectively inflates the size of the UK carbon budget, thereby giving the UK more leeway but in doing so increasing the risk of missing the Paris Agreement target as negative emission technologies do not currently exist. By basing the Northern Ireland target on an inflated target, but without having access to the technologies and offsets that this is based on, the recommended target for Northern Ireland is significantly less equitable than the Tyndall Centre target.

IV. Other scenarios

Although the CCC recommends an 82% reduction in greenhouse gas emissions by 2050 for Northern Ireland, the report for the 6th Carbon Budget does include a range of scenarios. The Widespread Engagement, Widespread Innovation, and Tailwinds scenarios achieve better emissions reductions than the recommended scenario, with the Tailwinds achieving a 94% reduction by 2050. These scenarios also suffer from the same controversial underlying assumptions as the recommended scenario, as explained above.

Rather than relying on advice from the CCC alone, an independent Climate Commissioner should be established. The Climate Commissioner would ensure Ministers and Departments introduce policies and plans to reduce carbon emissions and would provide regular, independent scrutiny reports on Northern Ireland's progress and compliance with the legislation. It would keep Northern Ireland on

track to do the most we can, in the quickest time, in a way that is fair to all. Without the scrutiny of the Commissioner, it is likely Northern Ireland will continue to lag behind.

It is important that the Climate Commissioner is independent of Government and free to be critical of departmental plans and policies. The Commissioner must be able to speak freely without fear of funding cuts, Ministerial gags, or political interference.

7. Responsibility on Government Departments and Public Bodies

Public bodies must play a leading role to ensure the required greenhouse gas emissions reductions are achieved. Public bodies often have large estates that could be used for the benefit of the public, for example for renewable energy generation, allotments, community tree nurseries, or community transport hubs. Public bodies also have large budgets, borrowing power and purchasing power that can be used to stimulate the low-carbon economy, or directly fund low-carbon projects.

Climate change is an overarching issue that affects all Government departments. The responsibility doesn't lie one department. To reflect this, we would like to see the creation of a dedicated Department for Energy and Climate Change, to ensure proper resourcing and more efficient programme delivery. Failing this, climate responsibility should lie with the Executive. It is best placed to ensure a co-ordinated response to the climate emergency.

We need a clear mechanism of enforcement that allows for straight forward action when a government department does not meet its obligations. The provisions as drafted raise questions around identifying causality, in other words pin-pointing which department is at fault. The absence of independent scrutiny reports assessing compliance with climate legislation make taking legal proceedings against a particular department challenging since proof of a breach of responsibilities must be ascertained first. Given that time is not on our side, this pursuit of legal remedy may take too long without an independent expert report. Therefore, an efficient mechanism to enforce breach of compliance must be put in place.

8. Resource implications

Any legislation and government policy will have resource implications. Given the severe implications of business as usual such as flooding, drought, displacement of people, ill-health, and negative impacts on well-being, doing nothing is not an option. The shift to a low-carbon society has multiple positive implications such as job creation, reductions in fuel poverty, improved air quality and overall quality of life, and environmental regeneration.

There is a lack of data currently on the costs and benefits of a just transition to net zero, versus the impact of 2+ degrees of warming on the Northern Ireland economy. We recommend this evaluation is carried out as part of the deliberation of the two Bills, to fairly and accurately assess the economic implications of the proposed targets.

9. Access to specialist advice

The Climate Change Committee is a recognised expert body and its advice should be sought and taken into account. The advice and recommendations from the Committee may be limited by UK Government policy, however, so consideration should also be given to scientific research, technical and technological developments, and policies of other countries, particularly Ireland, Scotland, and Wales.

Northern Ireland is a devolved nation with responsibility for climate change policy and action. We should not be fettered by the current Government in Westminster. Northern Ireland should assimilate advice not only from the CCC, but also from the Intergovernmental Panel on Climate Change, and the Climate Change Advisory Council. It should also be able to consult other relevant advisory bodies on as it sees fit, as the science develops. It's important that this advice is assimilated, assessed and translated for Northern Ireland to ensure compliance with Northern Ireland climate change legislation. A newly created Climate Office and Climate Commissioner for Northern Ireland should be established to undertake this role.

10. Transboundary considerations

Climate change and environmental damage don't respect borders. Northern Ireland shares an island with the Republic of Ireland. Transboundary impacts must be included if our move to a low-carbon society is to be fair.

The Bill does not address transboundary issues sufficiently. Its oversight mechanism is overly reliant on the CCC which has confirmed that it does not concern itself with the Republic of Ireland's efforts. This is entirely justified given that it is an institution set up under a UK Climate Change Act. However, the efforts of the ROI and the wider EU are crucial to understanding what will work and what will not work in the future. Northern Ireland must do its part in the global battle against climate change and to look inwardly and be isolationist will not work in these circumstances.

11. Additional information

A Northern Ireland Climate Change Bill has widespread support among the NGO sector, the business community, and the Northern Ireland Assembly. Northern Ireland must have a just transition to a low-carbon future. We have an imperative to make swift and dramatic greenhouse gas emissions cuts due both to our current emissions and the legacy of our historic emissions. We can no longer prevaricate. Introducing a Northern Ireland Climate Change Bill, with strong greenhouse gas reduction targets based on the most up-to-date science, is the right thing to do.

The proposed Number 2 Bill falls short in some crucial areas:

- I. It is not underpinned by a principle of a just transition. A just transition principle enables an efficient and co-ordinated change process. This would help to reduce the human and economic costs of climate disruption. It can also generate new jobs and a sustainable, inclusive economy now and into the future. However, these benefits will not happen automatically, especially if decision-makers fail to adequately tackle questions of fairness and equity in the transition. The concept of a just transition has understandably dominated the adaptation and mitigation of climate change in comparative jurisdictions. Scotland has established its own Just Transition mechanism as has the European Union, and Wales passed a Well-being of Future Generations Act. Such recognition of this concept is crucial to address the climate crisis and any legislation which is devoid of reference to a just transition will be outdated before it is even passed.
- II. It does not include a science-based net-zero target. A net-zero target has significant political power. It would establish a clear, unambiguous intent to transition to a climate compatible society.
- III. The Bill does not include Climate Action Plans. While a net-zero target would set the necessary direction of travel, the CAPs would establish how we get there. Without CAPs there is a danger climate policy will be unfocused, contradictory, and ineffective. Care should be taken, however, to avoid some sectors being given a de facto immunity from greenhouse gas reduction requirements, while others are forced to carry an unreasonably disproportionate burden. Policies and plans may offer transitional support to some sectors less able to make early cuts, but it would be wholly unjust to allow some sectors to continue to grow and produce increasing emissions while others have to make dramatic cuts.
- IV. Advice should be sought from all relevant scientific advisory bodies, not just the CCC, to ensure the fullest possible information is drawn upon when devising policy, amending targets, and assessing overall compliance with the legislation.