



Mr Declan McAleer MLA,
Chairperson,
Committee for Agriculture, Environment and Rural Affairs,
Room 242,
Parliament Buildings,
Stormont,
Belfast,
BT4 3XX

14 July 2021

Dear Mr McAleer MLA,

Re: Call for Evidence and Views on the Climate Change Bill

The Consumer Council welcomes the opportunity to participate in this call for evidence on the Climate Change Bill (the Bill).

Policy Objectives and Target of the Bill

The Consumer Council is unambiguous in its view that achieving net zero greenhouse gas emissions (net zero) is essential for long-term consumer protection.

The achievement of net zero must come about through the development of a sustainable energy future that works for us all. It is essential that we achieve a just and fair transition by ensuring affordability, security of supply and consumer protection.

To achieve net zero will be difficult and complex. The Climate Change Committee (CCC) has stated that while there is no purely technical reason why Northern Ireland cannot reach net zero by 2050, to do so will be significantly challenging.

The overriding climate objective set by the Bill, the establishment in Northern Ireland of a net-zero carbon, climate resilient and environmentally sustainable economy by the year 2045, is more ambitious than that proposed for Northern Ireland by the CCC.

If the outworkings of the Bill, or any other legislation introduced to set targets for greenhouse gas emission reductions, prove overly burdensome and unaffordable for consumers our net zero goal will not be achieved.

Declaration of a Climate Emergency

To achieve net zero will necessitate significant behavioural change from consumers. However, consumer awareness of the levels of behavioural change required is low, as is their eagerness for such change.

The declaration of a climate emergency by the Northern Ireland Assembly would demonstrate leadership. It would indicate to consumers the importance of achieving net zero and provide impetus for the consumer lifestyle change that is required for us to do so.

However, if we are to achieve a just and fair transition, consumer behavioural change cannot be demanded without first providing appropriate support and incentive to consumers.

Climate Action Plans, Office of a Climate Commissioner, and Responsibility on Public Bodies

If Northern Ireland is to achieve its net zero target it is essential that there is a coordinated and joined-up approach to drive delivery across all levels of central and local government. Climate Action Plans implemented by the Executive Office would provide leadership and a mandate for delivery.

In response to the Department for the Economy's Energy Strategy Options Paper we noted the necessity for strong governance, robust cost controls for government spending, and stringent cost assessment of regulated energy industry spending.

Our Response also noted the requirement for the robust measurement of success including the interrogation of performance against targets on a regional basis or across consumer groups.

The access to information stipulations within the Bill should provide the proposed office of a climate commissioner the ability to report on performance against the overarching targets set by the Bill.

Sectoral Plans and Resource Requirements

The Consumer Council welcomes the proposal for sectoral plans to support the proposed Climate Action Plans and that the sectoral plans shall:

- reduce inequality as far as possible;
- reduce, with a view to eliminating, poverty and social deprivation;
- support jobs and growth of jobs; and
- create work which is high-value, fair and sustainable;

However, the Consumer Council notes that the Bill stipulates that these aims should be undertaken *“without limiting the generality of the overriding climate objective”*.

If this is to be the case significant investment will be required to provide the necessary information, education, wrap-around support, and technical and financial advice that will be required to avoid consumer detriment.

Access to Specialist Advice

The Consumer Council welcomes the proposal that the UK Climate Change Committee (UK CCC) will provide advice to the Commissioner when they report annually against the Climate Action Plans. Strong delivery, based on specialist independent advice and subjected to Northern Ireland Assembly scrutiny, is essential to garner public trust and confidence.

Impact Assessment

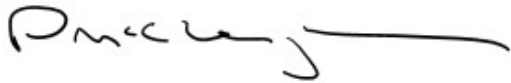
Tailored approaches to supporting consumers through the energy transition are essential for a range of population groups including those on low incomes, of pensionable age, consumers who are disabled or living with long-term health conditions, and those living in rural areas.

The Council of European Energy Regulators (CEER) has outlined a 2030 Vision for Energy Consumers, setting out a useful Consumer Protection Model that can help to ensure no one is left behind in energy transition. We would encourage use of this tool in the development of future policy and in the consideration and selection of the appropriate means to address consumer protection requirements during the energy transition.

Additional Information

We would welcome the opportunity to provide oral evidence to the Committee regarding the Bill and our comprehensive response to the Department for the Economy Energy Strategy Options Paper, submitted alongside this letter, which helped inform our assessment of the Bill.

Kind regards,

A handwritten signature in black ink, appearing to read 'Peter McClenaghan', with a long horizontal stroke extending to the right.

Peter McClenaghan

Director of Infrastructure and Sustainability