Response to CAERA Call for Evidence - Climate Change Bill

15th July 2021

Introduction

It is over ten years since the UK Climate Change Act was introduced and still no NI specific Climate legislation exists. The introduction of the Climate Change Bill is, therefore, a major milestone.

- Society is facing the dual threats of a nature and climate emergency. It is therefore vital that any legislation seeks to address *the nature and climate emergency in tandem.*
- It is critical that we create a net zero and 'nature positive economy'.
- The Northern Ireland Climate Change Bill should be a landmark piece of legislation which establishes in law robust climate action plans; a clear and ambitious net zero target, and an oversight mechanism to steer Northern Ireland towards net-zero by 2045.
- We urge the Committee to support the inclusion of 7 amendments to strengthen the Bill:

Amendment 1 – Place a duty on public authorities to take into account the climate emergency.

Amendment 2 – Include the aim of a 'biodiversity rich environment' in the overriding climate objective.

Amendment 3 – Ensure that Climate Action Plans include nature-based solutions.

Amendment 4 – Ensure TEO seeks expert advice before setting targets and measures

Amendment 5 – Timing of taking matters into account

Amendment 6 – Include a sectoral plan for fisheries

Amendment 7 – Establish a just transition fund for agriculture

1. Policy Objectives

This Bill provides much needed urgency to drive climate change mitigation efforts in Northern Ireland, by securing in law a binding commitment to deliver net zero by 2045. This Bill will require government to develop the necessary plans, policies and programmes to deliver the low carbon transition in Northern Ireland.

However, it is essential that the Bill includes explicit reference to, and drives action in relation to, adaptation as well as mitigation. Even if we stop all emissions immediately, we have already locked in a certain amount of climate change. Therefore, the role of adaptation should be strengthened in the Bill, in particular, a need for better definition and integration of adaptation and resilience throughout the Climate Change Bill, strengthening of adaptation reporting measures for both public sector and civil society and capacity building and development of expertise on climate in public bodies and organisations across NI.

2. Declaration of a Climate Emergency

We support the declaration of a Climate Emergency. However, peer reviewed evidence on Climate Change[1] and Biodiversity[2] shows that the Nature and Climate Emergencies are inextricably linked. The Intergovernmental Panel on Climate Change (IPCC) and the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) are united in their view that climate change and biodiversity interconnected and that neither domain can be addressed without effectively addressing the other[3]. It is essential that we pursue an integrated and joined-up approach to tackling these twin emergencies. Therefore, we urge the Committee to amend the Bill to ensure it declares both a Climate *and* Nature Emergency.

With the UK Government hosting the UN Climate Conference (CoP26) in November 2021 in Glasgow and the Chinese Government hosting the UN Convention on Biodiversity (CoP15) taking place in October 2021, the NI Assembly and Executive must embrace this global momentum to deliver a Climate Change Act.

As alluded to in the latest Climate Change Risk Assessment[4], the scale of the climate emergency is exacerbated in Northern Ireland by a lack of preparedness, less reliable evidence and fewer climate policies which has created "increased the uncertainty" around future impacts.

There must be a clear duty on all public authorities in Northern Ireland to consider the climate emergency when exercising their functions, as established both within and outside of this Bill. We are proposing the following amendment which would introduce such an overarching duty, and in doing so embed the climate crisis within decision-making across Northern Ireland from the Executive down to local councils.

AMENDMENT 1 - **duty of public authorities with respect to the emergency**

After clause 1 insert

"Duty of public authorities with respect to the climate emergency

1A. Every public authority must, in exercising its functions, whether under this Act or otherwise, take into account the climate emergency."

3. Net Zero Target

To date, the response to the climate crisis in Northern Ireland has been slow and lacking in ambition[5]. It is over ten years since the UK Climate Change Act was passed and over a year since the New Decade New Approach document committed to introducing a Climate Change Act for Northern Ireland.

Since the introduction of the UK Climate Change Act, greenhouse gas emissions fell by 9% in Northern Ireland (2008-2016), compared to a 27% fall for the whole of the UK. The disparity in emission reduction progress between Northern Ireland and the rest of the UK can be attributed to having no binding climate change legislation. Given that Northern Ireland is lagging behind, urgent and ambitious action

[1] Intergovernmental Panel on Climate Change (IPCC) 2018 https://www.ipcc.ch/sr15/chapter/spm/
[2] Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) 2019, https://ipbes.net/document-library-catalogue/summary-policymakers-global-assessment-laid-out
[3] 20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf (ipbes.net)
[4] CCRA-Evidence-Report-Northern-Ireland-Summary-Final.pdf (ukclimaterisk.org)
[5] In total, the UK reduced emissions by 44% between 1990 and 2019. Scotland and England reduced emissions by 45% and 44% respectively. Wales and Northern Ireland reduced emissions by 31% and 18% respectively.

is now required to ensure a move to net zero. Indeed, in April 2021, the UK Government further increased its ambition level by enshrining a 78% cut in carbon by 2035 into law[6].

The net zero by 2045 target is rooted in the overwhelming scientific evidence that we are living in a Climate and Ecological Emergency (IPBES, 2019; IPCC, 2018; among others) and that ambitious action is needed to limit global temperature increases. Devolved legislatures have it within their power to set their own ambition levels and develop bespoke legislation to tackle the Climate Emergency. For example, the Scottish Parliament[7] set a more ambitious legal target (net zero by 2045) than the rest of the UK. The Welsh government has chosen to go further than the 95% emissions reduction proposed by the UK Committee on Climate Change (CCC).

To achieve the Paris Agreement's most ambitious goal of keeping global warming below 1.5°C (2.7°F) above pre-industrial levels requires reducing global greenhouse gas (GHG) emissions by 50 percent by 2030. The Intergovernmental Panel on Climate Change (IPCC) is an independent international body of scientists, endorsed by the UN, which provides objective scientific views on climate change from a global perspective. The IPCC Special Report on Global Warming (2018), makes clear that all governments must act faster to limit global warming to 1.5°C in order to protect people and the planet. The report states that on current trajectories the world could exceed 1.5°C of global warming as early as 2030. Human activities have already caused the planet to warm by over 1°C and even with current international commitments to action, the world is on track to reach catastrophic levels of global warming of more than 3°C by the end of the century. "Even if the Paris goals are delivered in full and global temperature rise is limited to 1.5°C, there will be further impacts from climate change beyond those already occurring today. If the Paris goals are missed, the global and UK impacts will become much more severe. The UK needs to increase its ambition on climate change adaptation, as it is not prepared even for the 1.5-2°C world."[8]

The net zero by 2045 target also enjoys public support in NI, as demonstrated by an opinion poll carried out last year[9]:

Should NI have a Climate Change Act to help address the Climate Crisis?
Yes : 74%
No: 14%
Unsure / No opinion : 12%

Should NI have a target to reach net zero emissions by 2045?
Yes : 68%
No: 20%
Unsure / No opinion : 12%

Are you concerned about the impact that Climate Change will have upon the life of you or your family?
Yes : 69%
No: 16%
Unsure / No opinion: 15%

[6] https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035
[7] https://www.gov.scot/policies/climate-change/reducing-emissions/
[8] CCC (2020) The Sixth Carbon Budget – The UK's path to Net Zero
[9] Picture credits: Simon Harrison and Gordon Clarke

As the UK CCC Advisory Group on the Costs and Benefits of Net Zero noted: *"One advantage of [a net zero target versus 80%] is that it removes uncertainty and the temptation of sectors to lobby for a larger share of the remaining 20% of emissions. The clarity of a 'net zero' goal, coupled with good policy design, could help stimulate innovation across all sectors, and cut the cost of capital, thereby bringing down the overall cost of mitigation."* [10]

Opting for a net zero target, covering all GHGs therefore removes any ambiguity or confusion and ensures fairness between sectors. In its 2019 report, the UK CCC said: *"Within the UK, a 100% all-GHG target sends a clear signal that all greenhouse gases matter and all need to be reduced. No sources of emissions can qualify for special treatment. All emissions from all sectors must be eliminated or offset with removals."*

A net zero target also aligns with every other jurisdiction in the UK and Ireland, as well as the private sector 'race to zero'. To opt for any other target or % reduction would leave Northern Ireland at odds with the direction of travel being pursued by all other jurisdictions in the UK and Ireland.

Becoming a 'net zero region' will also give Northern Ireland more international credibility providing opportunities in research and innovation, and potential co-benefits like protection against flooding, better transport connectivity, healthier lifestyles and greener cities, as well as richer and more vibrant ecosystems.

As the recent Dasgupta review illustrated, the global economy is predicated on the natural environment, and governments have collectively failed to protect their nature portfolios. The climate and nature crises are inextricably interlinked and must be addressed collectively.[11]

The overriding objective of the Bill should, therefore, be amended to recognise the vital role of biodiversity. This proposed amendment would ensure that a requirement to better protect Northern Ireland's precious biodiversity is embedded within decision-making and actions laid out within the Climate Action Plans.

The following amendment should be made to the overarching climate objective:

AMENDMENT 2 – biodiversity

In clause 2(2) after "economy" insert "within a biodiversity-rich environment".

4. Climate Action Plans

A Climate Change Act should place a duty on the Northern Ireland Executive to develop a robust and ambitious Climate Action Plan. A Climate Action Plan should set out Ministers' proposals and policies for meeting the emissions reduction targets during the plan period and should cover areas such as, nature based solutions, agriculture/food, energy, transport, waste, land use/land use change and forestry, residential and public (buildings). The Climate Action Plan should set out sector specific targets and carbon budgets and should be published by The Executive Office.

RSPB believes that the first Climate Action Plan should be laid before the NI Assembly within **two** years of the Act receiving Royal Assent, with updated Climate Action Plans being tabled every five years. We would suggest that the Committee give consideration to the limit on when the first Climate Action Plan

[10] https://www.theccc.org.uk/wp-content/uploads/2019/05/Advisory-Group-on-Costs-and-Benefits-of-Net-Zero.pd

[11] IPBES and IPCC (2021). Biodiversity and Climate Change Workshop Report. Available at: https://www.ipbes.net/sites/default/files/2021-06/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf

is activated due to the fact that we cannot afford to delay acting in the face of a growing climate emergency.

Carbon budgets are an important mechanism for understanding the maximum amount of carbon emissions that can be released into the atmosphere in order to reach interim targets and the ultimate end point of net zero by 2045. Carbon budgets should specify the limits to carbon emissions within the period of the commitment and should align with the dates of the interim targets. Carbon budgets should be reviewed on a five yearly basis to reflect the most up-to-date science, any changes in global agreements on climate mitigation. Carbon budgets should include the quantified contribution of nature and natural habitats to carbon sequestration.

The Scottish Climate Change Act establishes a duty on Ministers when setting targets and interim targets to have regard to the likely environmental impact, particularly on biodiversity. This ensures that climate targets and carbon reductions are not pursued in a blinkered fashion creating perverse outcomes for the natural environment. It is also important to have integration between the Climate Act and any future biodiversity, nature restoration or environmental targets.

Implementation of nature-based solutions (NbS)[12] to climate change will have a key role to play to achieve net zero. Nature can help address the Climate and Ecological Emergencies by taking carbon out of the atmosphere, naturally storing it, supporting adaptation and helping reverse the decline in nature. Essential natural carbon stores include forests, grassland, peatlands, coastal wetlands such as saltmarshes and marine habitats such as kelp forests and sea grasses. Unfortunately, many of our ecosystems are in poor condition, releasing carbon into the atmosphere, instead of storing it safely in the ground. Protecting and restoring these areas will enable nature to absorb more carbon, whilst providing important habitats to help reverse the decline in nature.

Given the growing awareness of the vital role of nature based solutions to climate change, specific provisions have been incorporated into the Republic of Ireland's Climate Action and Low Carbon Development (Amendment) Bill:

> *(cb) to support nature based projects that enhance biodiversity and seek to reduce, or increase the removal of, greenhouse gas emissions or support climate resilience in the State;",*
>
> *(vi) enhance biodiversity through nature based projects that seek to reduce, or increase the removal of, greenhouse gas emissions or support climate resilience in the State;",*

The IPBES report stated that 1 million species globally are at risk of extinction, and the 2019 State of Nature report found that 41% of UK species have declined since 1970, with the UK being one of the most nature-depleted countries in the world. The 2019 'State of Nature Report' also report that of the 242 species assessed, 11% are at risk of extinction. Ecosystem break-down leads to vast releases of greenhouse gases; climate breakdown will lead to extinctions on a grand scale – the two need to be addressed in tandem and Nature Based Solutions to climate change will play an important role.

Given the importance of harnessing the power of nature to help tackle the climate emergency, the Northern Ireland Climate Change Bill should include the following amendment:

AMENDMENT 3 – nature-based solutions

[12] The most widely accepted guidelines around a definition of nature based solutions, can be found here and reflect the guidelines set out by Seddon et al. (2020) for designing robust and resilient NbS that address the urgent challenges of climate change and biodiversity loss.

In clause 3, after subsection (3) insert –

"(3A) The climate action plan must, so far as is practicable, make use of nature-based solutions.

(3B) In this section "nature-based solution" means a solution that is inspired by and supported by the process and functioning of nature, which is cost-effective and provides environmental, social and economic benefits and helps to build resilience."

To ensure that targets to tackle climate change are robust and effective, they must be based on the best available advice. Targets that stem from this Bill must not simply be desirable but must incorporate expert advice to ensure that when actioned by Government, businesses, and individuals, they lead to demonstrable environmental benefit including emissions reduction and habitat restoration (e.g. peatland). The Bill currently requires specialist advice to be sought before setting targets under the Climate Action Plans (Clause 3(4)), carbon budgets (Clause 5(a)), and nitrogen budgets (Clause 6(a)). Those who can provide such advice are narrowly defined in Clause 1(2)(a) of the Bill to include the UK Committee on Climate Change, IPCC, and the Republic of Ireland Advisory Council. Whilst these bodies are extremely valuable sources of evidence and advice, as drafted this clause limits the scope of specialist advice that can be sought.

This proposed amendment would broaden the expertise that can be sought.

AMENDMENT 4 – Ensure The Executive Office (TEO) seeks expert advice before setting targets and measures

In clause 3, after subsection (3) insert

"( ) Without prejudice to the generality of consultations under section 2(4), before setting targets and determining measures, the Executive Office must consult-

(a) the United Kingdom Committee on Climate Change,

(b) other persons who appear to the Executive Office to have expertise in this area, and

(c) such other persons as appear to the Executive Office to be appropriate."

AMENDMENT 4A

In clause 3, leave out subsection (4)(a), (5)(a) and (6)(a).

AMENDMENT 5 – timing of taking matters into account

In clause 3(4)(b) leave out "prior to such targets being set,".

5. Office of a Climate Commissioner

The Commissioner should review the adequacy and effectiveness of the Act and prepare review/progress reports on the working of the Act for the Assembly. The Commissioner can propose recommendations for amendments to the Act which are considered necessary and desirable in order to achieve the overriding climate objective.

It is necessary to consider the role of a new Climate Office and Commissioner in the context of other existing and emerging governance structures and advisory bodies, such as the UK CCC and, subject to Assembly approval, the new government watchdog: the Office for Environmental Protection (OEP). We welcome the inclusion of climate change mitigation within the remit of the OEP, meaning it can advise on related matters, monitor progress against emissions targets, and take enforcement action where

public authorities are not fulfilling their statutory climate related duties. We believe there are clear and distinct roles for these three bodies. They must not duplicate effort or undermine each other.

It will be necessary to:

i) Define clear responsibilities for the NI Climate Commissioner: including monitoring the adequacy and effectiveness of the Act, preparation of reports on the implementation and development of climate related legislation, and provision of independent advice to the Assembly.

ii) Maintain a role for the UK CCC and its advice: the CCC must be able to continue to act as an adviser to government for climate change mitigation.

iii) Clarify geographic scopes: the UK CCC covers, like the Climate Change Act 2008, the whole of the UK. The OEP will cover England and Northern Ireland, and the NI Climate Commissioner will only cover Northern Ireland.

iv) Formalising relationship: there is a need for co-operation between an NI Commissioner, the UK CCC and OEP, but we suggest that that a degree of flexibility is left in how this is achieved and that it is appropriate for the two bodies to work out the details in practice, rather than for these to be prescribed in legislation. The Climate Change Bill for Northern Ireland should require co-operation and information sharing so that the organisations can operate effectively.

When establishing the NI Climate Commissioner input should seek input from relevant stakeholders. This would enable relevant expertise on the creation and demarcation of how such bodies are developed and their independence protected to be integrated from the outset. The success of any additional advisory bodies is founded in the clear demarcation of responsibility.

6. Sectoral Plans

We support the inclusion of sectoral policies and programmes for the sectors listed in the Bill to realise the ambitions of the Climate Action Plan but would endorse the inclusion of an additional sectoral plan for fisheries.

Fisheries/Marine

Northern Ireland has yet to fully develop future fisheries policies, particularly in relation to the fulfilment of the Fisheries Objectives set out by the new UK Fisheries Act (2020). The inclusion of a sectoral plan for fisheries in a future Climate Change Act will build upon any future policies relating to the climate change objective in the Fisheries Act (2020). For example, the Joint Fisheries Statement which will set out how the devolved administrations will deliver on each of the 8 fisheries objectives.

This can be achieved by including the following amendment:

Amendment 7 – Include a Sectoral Plan for Fisheries
In clause 3(7), page 5, line 13, at end delete "and" and insert
"(i) fisheries; and"

Agriculture

Agriculture has a vital role to play in reducing Northern Ireland's Greenhouse Gas Emissions and in delivering greater carbon storage and sequestration from our land. Achieving ambitious GHG reductions from agriculture remains a significant challenge, but one that must be overcome; 'business as usual' is not an option. It will take ingenuity, innovation and, ultimately, a transformation in how we farm and manage our land. But with this, there is much to be gained alongside reductions in GHG

emissions. Farming can simultaneously deliver improved water and soil quality, flood mitigation and help restore nature whilst supporting a more productive and resilient food system. We must avoid the false narrative that climate action will harm the interests of farming. In fact, many actions to reduce a farm's carbon footprint can also make economic sense. For example, simple changes to a crop rotation can reduce the need to buy artificial fertiliser, whilst well planned use of inputs can lead to greater efficiency savings.

In some farming systems, reducing livestock numbers in line with natural carrying capacity of the land, can improve profitability, deliver better environmental outcomes and is likely to reduce overall GHG emissions[13]. Integrating grazing regimes with biodiversity is essential, and mixed farms can benefit from synergies between livestock and crops. Actions include:

- Match stocking rates with the carrying capacity of the land to prevent overgrazing and reduce inputs and methane emissions, improving overall profitability
- Increase hedges and trees on and around pasture as shelter
- Integrate silvopastoral systems to increase productivity, sequester carbon and improve biodiversity
- Reduce use of imported feedstocks and grow on-farm proteins, e.g. peas and beans

Well-managed land for nature helps store and sequester carbon and can also help farm adaptation to a changing climate, building resilience in the face of change. Therefore, On Farm Nature Based Solutions must be imbedded as a key component of future sectoral policies and programmes to enable agriculture to play a significant role in climate mitigation. Farms are the ideal places to embed nature-based solutions to climate change, helping move towards net zero emissions and restore thriving wildlife in the UK. Farmers and land managers should be supported and incentivised to protect, enhance and create natural habitats on their farms as a top priority. Actions include:

Protection and appropriate management of existing carbon rich habitats including flower rich grasslands, floodplains, wet grassland, wood pastures, salt marsh, and heathlands.

- Restoration of wet peat and blanket bog
- Establishment of trees and shrubs, using native trees in suitable habitats and encouraging natural regeneration in unproductive areas
- Increase grass and margins for pollinators, natural pest control and carbon sequestration
- Creation of buffer zones along waterways with suitable vegetation, sequestering carbon, safeguarding water quality, and connecting habitats.
- Expanding hedgerows for habitat and carbon and cutting on a three-year rotation
- Agroforestry, for example the introduction of fruit trees into crops to increase environmental and economic resilience

A Climate Change Act should also establish a just transition fund for agriculture to invest in appropriate technology, equipment, infrastructure and nature based solutions which enables a transition to climate and nature friendly farming practises. In developing agricultural mitigation strategies, the potential impact on nature and the wider environment should be considered, with the focus being on delivering interventions which have proven climate benefits and as a minimum have no negative impact on biodiversity or resource protection. Climate mitigation strategies which can maximise a number of positive environmental outcomes should be prioritised.[14]

[13] Hill Farm Profitability Report

Amendment 7 – A just transition fund for agriculture

After clause 4 insert

"Just transition fund for agriculture"

4A. (1) The Department must establish a just transition fund for agriculture.

(2) The purpose of the fund is to provide assistance to the agriculture sector in respect of any transition required in order to secure the overriding climate objective.

(3) The fund may, in particular, include provision in respect of-

(a) advice, including business advice,

(b) financial support, and

(c) investment, including investment in new technologies,

for farmers and those who may become farmers.

(4) This section does not limit the sectoral plans required under section 3(7).

Energy

It is important that the urgent actions taken to address climate change do not increase the threat to biodiversity. In order to phase out fossil fuels, the deployment of renewable technology must be significantly increased – in the right places. We must ensure that renewables are deployed in harmony with nature, avoiding adverse impacts and maximising opportunities for nature recovery and resilience. This includes onshore, and offshore wind and solar deployed in the least ecologically sensitive areas as part of a strategically planned and timely energy mix. Unchecked and without action to alleviate additional pressures, inappropriately sited renewable energy deployment – particularly offshore wind – will threaten the long-term conservation of our internationally important seabirds[15][16]. While RSPB supports the deployment of renewable energy to help combat the climate emergency, these efforts must proceed in harmony with nature.

Any energy sectoral plan arising from this legislation should have sector specific emission reduction targets, and be set within an overarching ambitious zero emissions target with interim targets and milestones , if we are to deliver on the urgent and transformative changes needed to reach net zero by 2045 at the latest, all in harmony with nature.

7. Resource Implications

Achieving the low carbon transition will require significant investment and support across all sectors of society and government spending will need to be fundamentally re-prioritised to enable the scale of transformation required. Future investment should align with delivering the policies and programmes

[15] Marine Scotland – Appropriate Assessment for Neart na Gaoithe offshore wind farm: SNH provided further responses on 5 and 8 October 13 2018, advising that in its view the Development in-combination with the existing consents for Inch Cape Offshore Wind Farm and Seagreen Alpha and Bravo Offshore Wind Farms would have an adverse effect on site integrity as follows: Forth Islands SPA – with respect to gannet, kittiwake and razorbill; Fowlsheugh SPA – with respect to kittiwake and razorbill; St Abb's Head to Fast Castle SPA – with respect to kittiwake.

[16] Natural England's final position for Offshore Ornithology at the close of the Norfolk Vanguard Offshore Wind Farm Examination was that it is not possible to exclude an adverse effect on integrity on the Flamborough and Filey Coast SPA in-combination with other plans or projects.

contained within a new Climate Plan and should involve a major re-purposing of existing and future government spend. This will require real political leadership. For example, the ongoing development of new agriculture policy in NI risks perpetuating existing unsustainable forms of agriculture with negative climate impacts. A fundamental reform of agriculture policy based around the concept of 'public money for public goods' can help re-shape how this huge sum of public money is spent to empower landowners to deliver the land use changes required to tackle the climate emergency.

Investing in the low carbon transition makes financial sense, with the costs of inaction, greatly outweighing the costs of taking action now. The UK CCC have also stated that "the later cuts are made, the greater they must be to achieve the same long-term goal, and so they will be more expensive to implement"[17]. Further delay in legislating for climate targets will bring "uncertainty and more room for indecision… increase costs of capital… lead to unnecessary costs…miss opportunities for increased investment…"and leave NI open to new policies such as border tariffs due to climate commitments in other countries.

The costs of climate change, are already being acutely felt in Northern Ireland, owing to a lack of preparedness. These impacts are predicted to worsen and according to the Northern Ireland Flood Risk Assessment 2018[18], approximately 45,000 properties (c. 5%) in Northern Ireland are at risk of significant flooding. About 33,000 people in Northern Ireland are currently at major risk of flooding with expected annual damages (EAD) for residential properties direct costs of £21.2 million on average.

Economically and financially, it makes sense for Northern Ireland to act now. For example, the Institute for Public Policy and Research[19] has concluded that greater investment in a green recovery and clean, low-carbon jobs could create 1.6 million new jobs over the next decade of which over 40,000 could be in Northern Ireland. Of those 1.6 million jobs, half a million (560,000) could be created by improving the energy efficiency of homes, which would also help reduce fuel poverty and help the health and economic prospects of thousands. Simply doing the bare minimum to reduce emissions would present a missed opportunity for Northern Ireland to lead from the front in tackling the climate and nature emergency and maximising the benefits that a low carbon economy can provide.

8. Access to Specialist Advice

The Commissioner should have the flexibility to receive specialist expert advice on matters of climate law, regulation, and science (including on matters of the nature crisis) from a range of bodies and institutions. The UK CCC will be an important source of independent expertise alongside the Climate Advisory Council in Ireland. Advice and latest scientific evidence produced by the UN led Intergovernmental Panel on Climate Change and the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) will also be key sources of scientific evidence to inform climate responses in Northern Ireland.

9. Responsibility on Public Bodies

Responsibility for Climate policy in Northern Ireland currently sits within DAERA. The Climate team within DAERA has been historically under-resourced and lacked focus on mitigation. Given the cross-cutting scope of the climate and nature and nature emergencies and the need for clear and unambiguous climate leadership we would urge our political leaders to follow the example of Wales in establishing a new Climate Change Minister. This would allow one Minister to provide dedicated focus,

[17] Letter: Economic costs of setting and delivering a 2050 emissions target for Northern Ireland - Climate Change Committee (theccc.org.uk)

[18] https://www.infrastructure-ni.gov.uk/publications/northern-ireland-flood-risk-assessment-nifra-2018

[19] https://www.ippr.org/research/publications/transforming-the-economy-after-covid19

ensure coherence across the Executive, and demonstrate a new urgency to tackle climate change in Northern Ireland.

Failing the establishment of a new Climate Change Department, we would suggest that the Executive Office (TEO) could become the lead Department for Climate Change. Given its cross-cutting nature, TEO would be able to lead a whole of government approach to tackling climate change. Whichever Department assumes responsibility for climate change, it must be adequately resourced with relevant expertise to oversee the delivery of robust and ambitious climate policies and programmes.

Statutory reporting provisions for all major player public bodies on both mitigation and adaptation should be included in the Bill. The vital services provided by public bodies are at risk from climate change and, in comparison to other regions, NI is unprepared as highlighted by the recent Climate Change Risk Assessment (CCRA, 2021). The introduction of a flexible and positive reporting environment for a broad range of reporting authorities will help bolster future resilience and preparedness.

10. Transboundary Considerations

There is a need for a coordinated approach to climate action given the inter-dependencies between neighbouring jurisdictions. A transboundary approach should involve close cooperation between Northern Ireland, the Republic of Ireland and the rest of the UK.

11. Rural Impact Assessment

As a result of climate change, Northern Ireland is predicted to experience warmer, wetter winters with more intense rainfall and hotter, drier summers. However, cold snaps, drier winters and wet summers will occur, therefore we need to be prepared for a much greater range of extremes. Our coastline will change with sea level rise, increased frequency and severity of storms and our cities will get hotter as urban heat islands effect the ways we can live, work and play. Many more places will flood, effecting services, people, and places and we will have both opportunities and challenges in relation to the food we can grow locally and what we can import.

In recent years, Northern Ireland's rural community has experienced multiple challenges as a result of climate change, such as extreme weather events including flooding, storms and drought, which have wrought havoc upon many rural communities. The Intergovernmental Panel on Climate Change predicts that these impacts will increase in frequency and intensity because of climate change, causing significant economic impacts for the agriculture sector[20]. A sustainable future for rural communities is dependent on halting and adapting to the climate crisis.

The impacts of climate change will typically impact most severely upon the most vulnerable in society, including those living in urban and rural communities. Therefore, ambitious climate action and adaptation measures will be crucial to minimise disruption and creating a just and fair society.

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[20] Frances C Moore et al 2017. Res. Lett. 12065008 https://iopscience.iop.org/article/10.1088/1748-9326/aa6eb2

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