

24th February 2021

Dear Stella McArdle and AERA Committee members,

Thank you for getting in touch in relation to the **Climate Change Committee Advice for NI in relation to the 2050 emissions reduction target**. Climate Northern Ireland is a cross-sectoral network devoted to increasing understanding of climate change impacts and risks within Northern Ireland and promoting the adaptation actions necessary to address these. It is led by a steering group which represents organisations from across business, local councils, academia, the voluntary sector and government. It works with stakeholders to help develop policy, practice and implementation of climate adaptation across all sectors. More information on our steering group can be found here. [Steering Group | Climate Northern Ireland](#)

You will find **more detail on all of the points raised in the Climate NI consultation response**, attached to this letter.

1. The Climate Change Committee (CCC) recommends “that any climate legislation for Northern Ireland must include a target to reduce all GHGs by **at least 82%** by 2050.”

‘At least’ suggests that **any target should aim for a higher ambition. A net zero target has political clarity, and benefits such as: the marketing of NI as a ‘Net Zero region’; opportunities in innovation; protection against flooding; better transport connectivity; healthier lifestyles; greener cities; and richer and more vibrant ecosystems. Adaptation should have the same importance as an emissions target within the Climate Bill.** We need a path to net-zero without causing lock-in of climate risks which would cause environmental, economic or social vulnerability.

As the 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.”¹

Given that the CCC’s Balanced Pathway includes a 35% reduction from today’s levels of meat consumption,² **a just transition should support rural livelihoods**. Food security and the implications of a growing population are a real concern, and policies that promote local and high-quality food

production are vital, but **our land use must strike a balance. Farmers and other land managers in NI must be supported to begin taking action now**, so as not to store up transitional problems for the future.

“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”³. Interim targets offer a focus for investment. These targets must be ambitious and respond to developing science and political contexts. As with the Scottish Act, the Northern Ireland Bill should include safeguards to prevent backsliding, to avoid a situation where residual emissions are put off into the next carbon budget potentially causing a cascade of missed targets. These targets must also link with the UK Climate Act, in particular, on harmonisation of timescales for carbon budgets, risk assessments and reporting timetables, in line with international best practice.

2. Design and delivery of these **targets must be backed up by NI-specific evidence where available, and the precautionary principle and best available evidence when local evidence levels are low.** Evidence is currently lacking in NI. It is therefore essential to develop a funded strategic climate change research programme for NI, alongside an independent expert advice body to provide guidance to the NI government. This research and the interim targets must also consider the link between GHG reduction policies and climate adaptation.
3. The government should seek to **incorporate good practice from both the Scottish Act and the UK Act.** Ministers could produce **five annual action plans** to state how they will deliver the reductions and adapt to climate change within each 5-year carbon budget period, and take a strategic approach similar to the recommendations from the Local-authorities and the sixth carbon-budget report. These plans would outline “specific policies and proposals (‘Report on Policies and Proposals’) for meeting those targets, and describing how these policies and proposals contribute to the Act’s statutory interim and long term GHG emission reduction targets.”⁴ These plans **must be independently reviewed by experts** at regular intervals.
4. We need to develop **statutory reporting mechanisms for both mitigation and adaptation** (including clear communication to the general public) to assess and monitor progress on adaptation and mitigation for local councils and public bodies.
5. **Public body reporting on adaptation is essential.** Climate NI proposes a three-point approach to ensure that it delivers the best outcome for Northern Ireland:
 - ‘Adaptation Reporting Power (ARP)’ for ‘Major Player’ Public Bodies
 - Improved Adaptation Reporting for Government Departments
 - Voluntary Adaptation Reporting for Civil Society

There must be **independent reviews of Northern Ireland Climate Change Adaptation Programmes by an independent NI or UK Climate Change Expert Committee** to review adaptation progress on addressing the risks outlined in CCRAAs.

6. **An independent Northern Ireland Advisory Body on Climate Change is essential to enable this bill to deliver emissions reductions and a region resilient to the impacts of climate change.** Alongside this, it is crucial that those responsible for climate change within government are able to scrutinize budgets, targets and action across departments. Therefore, we suggest government could be restructured to amalgamate relevant departmental units into an executive ‘Climate Office’ to facilitate greater cross-government advice and working in the area of climate change.

7. **An expert Climate Change Committee is necessary** to provide guidance and sectoral expertise to guide and review climate change progress across central government, local government and public bodies. This body should have representation from all main sectors and must be genuinely independent with significant status and authority. The scale and complexity of the problem requires a multi-disciplinary approach with government working closely with other sectors and other jurisdictions. **A NI Climate Change Committee must work closely with both the UK Committee on Climate Change, and the Ireland Climate Change Advisory Council** to enable joined-up decision-making and address issues where jurisdictions meet at border regions (this could be achieved by including a member from the other committees).

8. Climate NI would like to draw the attention of the committee to a range of other key considerations, which must be considered for the development of the Climate Bill. As with all points in this letter, more detail is available in the Climate NI consultation document attached in the email.
 - Capacity of Government Departments
 - Capacity of Public Bodies
 - Strategic plan for financing for climate action
 - Research (including a programme of embedded researchers)

And a range of international best practice could also be used to guide any potential actions:

- Place-based Climate Action
- Prioritisation of Nature-Based Solutions
- Citizen Assembly and Citizen Engagement

In addition to our response there is currently an open Shared Ireland Consultation [http://files.nesc.ie/nesc_secretariat_papers/No 21 C&BD consultation.pdf](http://files.nesc.ie/nesc_secretariat_papers/No_21_C&BD_consultation.pdf) on Climate and Biodiversity Challenges and Opportunities which includes the broad area of “Climate Policy: Shared Focus on Increasing Ambition for 2030” from the National Economic and Social Council (NESC) for the Department of the Taoiseach.

For further information on any of the points raised please contact Stephen Jones, Resilience Co-ordinator, Climate NI at the following address: stephenjones@climatenorthernireland.org.uk

Kind regards,

Dr. Jade Berman Climate NI Manager

Climate Northern Ireland Response to:

Discussion Document on a Northern Ireland Climate Change Bill

29th January 2021

Climate Northern Ireland is a cross-sectoral network devoted to increasing understanding of climate change impacts and risks within Northern Ireland and promoting the adaptation actions necessary to address these. It is led by a steering group which represents organisations from across business, local councils, academia, the voluntary sector and government. It works with stakeholders to help develop policy, practice and implementation of climate adaptation across all sectors.

These comments are made on behalf of members of the Climate NI steering group outlined below:

- Ciaran Fox, Royal Society of Ulster Architects (Climate NI Chair)
- Craig McGuicken, Northern Ireland Environment Link
- Pete Gray, Institution of Civil Engineers
- Geraldine Noe, Business in the Community
- Roger B Street, Environmental Change Institute, University of Oxford
- Prof Andrew Cooper, Ulster University
- Gary McFarlane, Chartered Institute of Environmental Health
- Dr Stephen McCabe, Queen's University Belfast
- Joan McCaffrey, Regional Officer, Local Government Civil Contingencies, Joint Chair of the Regional Community Resilience Group

Government departments and agencies on the steering group were excluded, while some members were submitting their own responses. If you would like to discuss these comments further, we would be happy to do so.

For further information, please contact Stephen Jones, Resilience Co-ordinator, Climate NI at the following address: stephenjones@climatenorthernireland.org.uk

Thank-you.

Question 1: Which of the following high level options do you think is appropriate for Northern Ireland to take forward?

Option 1: Northern Ireland Climate Change Bill setting interim emission reduction targets and a long term target of net zero emissions in Northern Ireland by 2050 (long term target does not consider expert climate change advice)

Option 2: Northern Ireland Climate Change Bill setting interim emission reduction targets and a long term target for Northern Ireland by 2050, the long term target is an equitable contribution to achieving UK-wide Net Zero by 2050 (long term target considers expert climate change advice)

Not sure / No opinion

Climate NI fully supports the development of a climate bill for Northern Ireland. Around 60% of the levers required for climate mitigation policies are devolved or partially devolved, so Northern Ireland must have a legislative framework which makes best use of these levers.

The Climate Change Committee (CCC) recommends “that any climate legislation for Northern Ireland must include a target to reduce all GHGs by **at least 82%** by 2050.” Climate NI accepts the regional characteristics outlined in both the letter and DAERA consultation document, but we believe that given the variables and uncertainties in the modelling, it would not be in the spirit of the CCC advice to use 82% as the maximum long-term target; especially since the CCC notes that **“there is no purely technical reason why Net Zero is not possible in Northern Ireland.”**¹

The inclusion of the phrase ‘at least’ suggests that any target should aim for a higher ambition. There is considerable gain to be made from a net zero target in terms of political clarity, the marketing of NI as a ‘Net Zero region’, opportunities in innovation, and potential co-benefits like protection against flooding, better transport connectivity, healthier lifestyles and greener cities, richer and more vibrant ecosystems. Climate NI also emphasises the importance of giving adaptation the same importance as an emissions target within the climate bill. It is imperative that Northern Ireland sets a coherent approach to both mitigation and adaptation. This must set a path to net-zero without causing lock-in of climate risks which would cause environmental, economic or social vulnerability.

Lord Deben acknowledges in his letter that “peak temperature change is determined by when emissions of long-lived GHGs reach net-zero (assuming that short-lived GHG emissions are not rising)”.² The concern is that under an 82% (all emissions) target, all other sectors might have to work harder as agricultural methane could go unchecked, likely making up a huge percentage of the residual 18%. As the 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

¹ <https://www.theccc.org.uk/wp-content/uploads/2020/12/Lord-Deben-CCC-Letter-to-DAERA-Minister.pdf>

² <https://www.theccc.org.uk/wp-content/uploads/2020/12/Lord-Deben-CCC-Letter-to-DAERA-Minister.pdf>

across all sectors, and cut the cost of capital, thereby bringing down the overall cost of mitigation.”³

Given that the CCC’s Balanced Pathway includes a 35% reduction from today’s levels of meat consumption,⁴ it is important that a just transition focuses on supporting rural livelihoods. Food security and the implications of a growing population are a very real concern, and policies that promote local and high quality food production are vital, but our land use must still strike a careful balance. Farmers and other land managers in NI must be supported to begin taking action now, so as not to store up transitional problems for the future. A prioritisation of farm efficiency, improved land use and support for farmers will be key; promoting balance and not focusing solely on growth. Although there are differences between English and NI farms, this approach would be consistent with the framework set out by the National Farmers Union in their Net Zero by 2040 report. In NI, the Ulster Farmers Union have stated that “agriculture is part of the solution and our farmers are committed to reducing emissions and doing all they can to reach Net Zero.”⁵ Farmers could be supported through public money for public goods such as clean air; clean and plentiful water; thriving plants and wildlife; protection from environmental hazards; beauty, heritage and engagement with the environment; reduction of and adaptation to climate change; through an environmental land management scheme⁶.

Climate NI recommends that it would be the best to follow the Paris Climate Agreement and aim for the “highest possible ambition”⁷ from the outset.

Question 2: Do you have any opinions on what would be the most important criteria to be considered when setting or updating long term and interim emission reduction targets?

Yes

Not sure / No opinion

Climate NI agrees with the rationale for interim targets listed on page 30 of the consultation document. We draw particular focus to the idea 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”⁸ and agree that interim targets offer a focus for

³ <https://www.theccc.org.uk/wp-content/uploads/2019/05/Advisory-Group-on-Costs-and-Benefits-of-Net-Zero.pdf>

⁴ <https://www.theccc.org.uk/wp-content/uploads/2020/12/Lord-Deben-CCC-Letter-to-DAERA-Minister.pdf>

⁵ <https://www.ufuni.org/news/farmers-recognise-their-role-in-reducing-emissions-says-ufu>

⁶ <https://www.gov.uk/government/publications/the-environmental-land-management-scheme-an-overview/the-environmental-land-management-scheme-public-money-for-public-goods>

⁷ https://unfccc.int/files/meetings/paris_nov_2015/application/pdf/paris_agreement_english_.pdf

⁸ https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Discussion%20Document%20on%20a%20Northern%20Ireland%20Climate%20Change%20Bill%20-%20Full-length%20version_0.pdf

investment. These targets must be ambitious and respond to developing science and political contexts. As with the Scottish Act, the Northern Ireland Bill should include safeguards to prevent backsliding, to avoid a situation where residual emissions are put off into the next carbon budget potentially causing a cascade of missed targets. These targets must also link with the UK Climate Act, in particular, on harmonisation of timescales for carbon budgets, risk assessments and reporting timetables, in line with international best practice.

It is also important that design and delivery of these targets is backed up by NI-specific evidence where available, and the precautionary principle and best available evidence when local evidence levels are low, which is necessary to guide decision-making around emissions reduction and preparedness for a changing climate. Evidence is currently lacking in NI. It is therefore essential to develop a funded strategic climate change research programme for NI, alongside an independent expert advice body to provide guidance to the NI government (further detail in question 7). This research and the interim targets must also consider the link between GHG reduction policies and climate adaptation.

Question 3. Do you think flexibility should be built into the Bill, to allow consideration of new emerging evidence and science on climate change (for example on long lived and short-lived pollutants) when setting emission reduction targets?

Yes

No

Not sure / No opinion

Climate NI believes that flexibility should be built into the bill to allow consideration of new emerging evidence and science on climate change (for example on long lived and short-lived pollutants) when setting emission reduction targets. This could take the form used by the Scottish government in secondary legislation which can be amended and reviewed on a regular basis and would also not be vulnerable to any possible future suspension of the NI Assembly.

However, we reiterate that similar to the Scottish Act, this Bill should include safeguards to prevent backsliding, so as to avoid a situation where residual emissions are put off into the next carbon budget; potentially causing a cascade of missed targets. It is also important that these targets are backed up by robust evidence which is currently lacking in NI. It is therefore essential to develop a funded strategic climate change research programme for NI, alongside an independent

expert advice body to provide guidance to the NI government (further detail in question 7). Both the strategic research programme and the interim targets must consider the link between GHG reduction policies and climate adaptation, to avoid net-zero strategies causing lock-in of climate risks which would cause environmental, economic or social vulnerability.

Question 4. Do you agree that a Northern Ireland Climate Change Bill should include a duty for 5 yearly carbon budgets to set a statutory cap (interim emission reduction targets) on total greenhouse gases that can be emitted in Northern Ireland?

Yes

No

Not sure / No opinion

In line with the UK Climate Act, Climate NI agrees with the use of 5 yearly carbon budgets. These should be based on independent expert advice (provided by an independent expert government advisory body) which would take into account a number of factors such as latest climate change scientific evidence and relevant international developments, but also the co-ordination of roles and responsibilities across government; local and national.

Climate NI notes the importance of realising the Key Recommendations from the Local Authorities and the Sixth Carbon Budget report⁹:

- The Government and local authorities share a common goal to deliver Net Zero.
- The Sixth Carbon Budget can only be achieved if Government, regional agencies and local authorities work seamlessly together.
- Top-down policies go some way to delivering change, but can achieve a far greater impact if they are focused through local knowledge and networks.
- Four key things are needed to achieve this vision of collaborative delivery:
 - **Framework:** An agreed framework for delivery for Net Zero incorporating local and national climate action
 - **Financing:** Appropriate long-term financing to support local authorities in delivering Net Zero
 - **Flexibility:** Local operational flexibility around how local areas address climate change
 - **Facilitation:** coherent policy and powers for the facilitation of delivery.

⁹ <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>

Similar to Scotland, it would be beneficial to have Ministers lay out their action plan on an annual basis, to show how they plan to meet the current carbon budget as well as how this contributes to the interim and long-term targets.

In relation to ensuring targets are met, Climate NI proposes a stronger option than is used under the UK Climate Change Act. Currently in the UK, in the event of a carbon budget not being met, the relevant Secretary of State must lay before parliament a statement explaining why the budget has not been met, and must also lay before parliament a report setting out proposals and policies to compensate for excess emissions in future periods. In NI, a similar process could be strengthened through use of annual ministerial action plans, which would provide an ongoing monitoring framework and could enable faster changes if annual targets are not being met. There is precedent for this in the German Federal Climate Change Act¹⁰, although in order to avoid unnecessarily restrictive governance, the NI Bill might only enforce an emergency action plan at the end of the 5-year carbon budget period, allowing ministers the flexibility to miss annual targets as long as the carbon budget as a whole will be met.

To reiterate, Climate NI believes that government should seek to incorporate good practice from both the Scottish Act and the UK Act. Ministers could produce five annual action plans to state how they will deliver the reductions and adapt to climate change within each 5-year carbon budget period, and take a strategic approach similar to the recommendations from the Local-authorities and the sixth carbon-budget report. These plans would outline “specific policies and proposals (‘Report on Policies and Proposals’) for meeting those targets, and describing how these policies and proposals contribute to the Act’s statutory interim and long term GHG emission reduction targets.”¹¹ They would have flexibility to miss and amend targets year to year, as long as each carbon budget as a whole is met. These plans would begin to be laid before the assembly within two years of the bill becoming law and cover all major sectors which are sources or sinks of Greenhouse gases. They must consider climate adaptation measures, lock-in of climate risk from mitigation strategies, issues of biodiversity, water quality, soil quality, air quality and a just transition; reducing inequality, poverty and social deprivation.

¹⁰ The German Federal Climate Change Act (Bundes-Klimaschutzgesetz) provides a particularly robust version of a system of consequences for deviation from emissions targets. The German Act defines “permissible annual emission budgets” for six sectors of the economy. The federal government is required to report annually on greenhouse gas emissions in each sector. If this reporting shows that emissions for the preceding year have exceeded the sectoral emissions limits set out in the Act, the responsible government ministry is required, within three months, to present an “immediate action programme for the relevant sector” that “shall ensure compliance with the annual sectoral emission budgets in the subsequent years” – Taken from Torney. D (2020) *Supplementary submission to Oireachtas Joint Committee on Climate Action*. Accessed: https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_climate_action/reports/2020/2020-12-18_pre-legislative-scrutiny-on-the-draft-of-the-climate-action-and-low-carbon-development-amendment-bill-2020_en.pdf

¹¹ https://www.daera-ni.gov.uk/sites/default/files/consultations/daera/Discussion%20Document%20on%20a%20Northern%20Ireland%20Climate%20Change%20Bill%20-%20Full-length%20version_0.pdf

These plans must be independently reviewed by experts at regular intervals to ensure they account for evidence and reporting from other elements of the Climate Bill, international law, and their impact on the environment public health and well-being and other economic and social circumstances.

Question 5. Should provision for reporting on adaptation measures by ‘major player’ public bodies be included in a Northern Ireland Climate Change Bill?

Yes (which major player public bodies and why?)

No

Not sure / No opinion

Climate NI agrees on the need to develop statutory reporting mechanisms for both mitigation and adaptation (including clear communication to the general public) to assess and monitor progress on adaptation and mitigation for local councils and public bodies. These should include systems of encouragements for civil society to mitigate and adapt, similar to, and building on, the Civil Society and Local Government Reporting mechanism for adaptation set up by Climate NI through the Northern Ireland Climate Change Adaptation Programme 2019 (NICCAP2).

Adaptation reporting

Climate NI believes that reporting on adaptation is essential to this bill. The vital services provided by NI public bodies are at risk from climate change and in comparison to other regions, NI is unprepared. The introduction of a flexible and positive reporting environment for a broad range of reporting authorities will help communicate that adaptation is a process of continuous improvement. This can in turn build adaptive capacity, from major public bodies, to corporate actors and smaller sectoral bodies. Most importantly, it can help build resilience across society.

To take account of regional characteristics, enhancing and not burdening organisations through reporting, Climate NI proposes a three-point approach to ensure that it delivers the best outcome for Northern Ireland:

1. ‘Adaptation Reporting Power (ARP)’ for ‘Major Player’ Public Bodies
2. Improved Adaptation Reporting for Government Departments
3. Voluntary Adaptation Reporting for Civil Society

1. ‘Adaptation Reporting Power (ARP)’ for ‘Major Player’ Public Bodies

There is a need for an equivalent to the Adaptation Reporting Power (ARP) for Northern Ireland to bring us in line with other jurisdictions. Other UK regions are working with their public bodies through the UK ARP to invite public bodies to report on their Adaptation progress. This works to:

- ensure public bodies understand their climate risk and work toward preparing their staff, assets and services,
- ensure a systematic approach to climate change risk management across the region,
- help ensure public services and infrastructure are resilient to climate change, and
- monitor the level of preparedness of key sectors to climate change and enable government to track progress toward adaptation targets.

Across other jurisdictions in the UK, this reporting has made a significant contribution to increasing action, particularly in sectors where there had been limited previous work. It raised adaptation to board level and embedded climate change risks within organisations' corporate risk management procedures.¹² Public body reporting is currently voluntary in England (although the Climate Change Commission have strongly recommended it should be mandatory as is the case in Scotland). Support for public bodies to begin this process has also begun in Wales. An equivalent to the ARP should be included in NI legislation.

The definition of 'major players' should be amended to thresholds that fit the unique characteristics and scale of NI, following the example of England and Scotland to include bodies such as: Transport organisations including Airport operators; Harbour authorities; Electronic Communications, Water companies, Government regulators, Local Authorities, Further and Higher Education, National Health Service, Police and emergency services, National Parks, and a range of other non-departmental public bodies which would report on governance, adaptation and sustainable procurement issues.

Support is needed

Alongside legislation, public bodies should be provided with support to undertake adaptation planning and reporting. Support for public bodies is provided in Scotland through the Adaptation Scotland Programme, and could be delivered effectively and

¹² "ARP made a significant contribution to raising understanding of adaptation and increasing action, particularly in sectors where there had been limited consideration previously. It raised adaptation to the board level and in many cases embedded climate change risks within organisations' corporate risk management procedures" – Taken from Jude, S. R., G. H. Drew, S. J. T. Pollard, S. A. Rocks, K. Jenkinson, and R. Lamb. 2017. 'Delivering Organisational Adaptation through Legislative Mechanisms: Evidence from the Adaptation Reporting Power (Climate Change Act 2008)'. *Science of The Total Environment* 574 (January): 858–71. <https://doi.org/10.1016/j.scitotenv.2016.09.104> .

efficiently in Northern Ireland by Climate NI, by building on and expanding the existing provision of methods, tools and resources which support NI local government to develop adaptation plans and monitor and report their progress through NICCAP2, using the Climate NI NIAdapts toolkit.

Gathering and analysis of reports

As in Scotland, these public body submissions could be coordinated, collected and analysed by a non-government body, such as Climate NI. ARP and NICCAP reporting could be submitted on a single combined form which avoids additional administrative burden for local authorities and other public bodies. This would take place at the mid-point review and end-point review of each NICCAP cycle, thereby combining the best elements of both the Scottish and UK reporting methods and better integrating information from civil society and public bodies into government adaptation progress reporting.

NI should follow examples from the UK and Scottish Acts, and be able to direct a 'major player' to prepare a report containing any of the following—

1. an assessment of the current and predicted impact of climate change in relation to organisational functions;
2. a statement of the organisation's proposals and policies for adapting to climate change in the exercise of its functions and the time-scales for introducing those proposals and policies;
3. an assessment of the progress made by the organisation towards implementing the proposals and policies set out in its previous reports.

Government may also direct two or more 'major players' to prepare a joint report.

2. Adaptation Reporting for Government Departments

Reporting from Government Departments must be improved through the NICCAP (this reporting will not be captured under the 'major player' ARP power). There must be **independent reviews of Northern Ireland Climate Change Adaptation Programmes by an independent NI or UK Climate Change Expert Committee** to review adaptation progress on addressing the risks outlined in CCRAs. NI government investment and engagement in development of the CCRA must increase to ensure it provides a robust view of the climate risks facing NI (this is currently limited by lack of NI-specific evidence and lack of cross-departmental engagement). The development of NICCAPs must have suitable resource within government, and budgets available to support development of new actions and indicators across government. NICCAPs should set out how they address all risks and opportunities set out in CCRAs.

Currently the Adaptation Programme in Northern Ireland is internally reviewed at mid-term by DAERA and again at the end of the programme, but there is no review of

whether the actions within the plan are leading to better adaptation. An independent review would bring NI into line with the rest of the UK. Climate NI suggests:

- An assessment of the current and predicted impact of climate change in relation to departmental functions and the time-scales for introducing those proposals and policies and actions;
- An assessment of how the plan works in conjunction with the net zero target (it must avoid lock-in of climate risk caused by mitigation strategies) contribution both within Northern Ireland and also through international markets and similar connections;
- Adaptation targets within the Northern Ireland Climate Change Adaptation Programme should have associated budgets.
- Current NICCAP actions also largely use existing targets and indicators. A new suite of indicators should be developed and a base of research and evidence to support this.
- A public consultation for NICCAP3
- Independent review would also cover ministerial action plans leading from carbon budgets in this Bill, including assessing how ARP information is being used.

Government must respond to the independent report addressing any recommendations raised. Climate NI could provide input on progress from local government and civil society gathered through the NICCAP processes currently under development. It would also be advisable to include public bodies (as in point 1 above).

3. Adaptation Reporting for Civil Society

Climate NI has begun working with civil society (private sector, academia and the community and voluntary sector) through NICCAP2 to outline their important role in NI adaptation and outline the actions they are already taking which help address the risks set out in CCRA2. A light-touch progress reporting mechanism for civil society will be undertaken as part of the NICCAP2 midterm and end of programme reviews. To effectively plan and implement strategic climate action at national, regional and local levels, this work should be expanded to provide further support and collate progress from this important section of society.

International Best Practice

Reviews of reporting strategies used across the UK have been undertaken. NI should build on lessons learned from other jurisdictions including:

- addressing issues around trust and industrial confidentiality for reporting organisations,
- timing reporting to line up with Climate Change Risk Assessment and Northern Ireland Climate Change Adaptation programme evidence gathering cycles,

- the need to provide support (and constructive feed-back) for organisations to undertake adaptation planning and reporting and,
- emphasis and facilitation of additional value from sharing and dialogue between organisations and across sectors.

The submissions must be used in action planning, feedback should be given, and reporting should be done in such a way as to begin a two-way conversation, between those reporting, government and wider sectors.

Question 6. Should provision for reporting on mitigation measures by ‘major player’ public bodies be included in a Northern Ireland Climate Change Bill?

Yes (which major player public bodies and why?)

No

Not sure / No opinion

Climate NI agrees on the need to develop a statutory reporting mechanism for mitigation (including clear communication of progress to the general public) to assess and monitor progress for local councils and public bodies. This should include a system of encouragements for civil society to mitigate. Under additional mitigation services, Climate Northern Ireland plans to develop and implement a mitigation reporting and analysing method for SMEs and local councils. In future a similar approach could also be extended to public bodies.

The Climate NI response for this question mirrors the response to question 5. Climate NI believes that reporting on mitigation is essential to this plan and that both adaptation and mitigation reporting must be done in tandem.

On mitigation reporting, Climate NI echoes the same ideas from question 5 on issues of defining major players in an NI context, independent review and building on international best practice.

To take account of regional characteristics, enhancing and not burdening organisations through reporting Climate NI proposes a three-point approach to ensure that it delivers the best outcome for Northern Ireland:

1. Mitigation Reporting Power for ‘Major Player’ Public Bodies
2. Improved Mitigation Reporting for Government Departments
3. Voluntary Reporting for Civil Society

Question 7. In addition to continuing to avail of the expertise of the UK Climate Change Committee, should we also include provision in the Bill, for an independent Northern Ireland advisory body on climate change?

Yes

No

Not sure / No opinion

Climate NI believes that an independent Northern Ireland Advisory Body on Climate Change is essential to enable this bill to deliver emissions reductions and a region resilient to the impacts of climate change. Alongside this, it is crucial that those responsible for climate change within government are able to scrutinize budgets, targets and action across departments. Therefore, we suggest government should be restructured to amalgamate relevant departmental units into an executive 'Climate Office' to facilitate greater cross-government advice and working in the area of climate change.

An expert Climate Change Committee is necessary to provide guidance and sectoral expertise to guide and review climate change progress across central government, local government and public bodies. This body should have representation from all main sectors and must be genuinely independent with significant status and authority. Climate action in NI requires solutions which address the challenges, and considerable potential, offered by the specific environmental, economic and societal contexts of NI. The scale and complexity of the problem requires a multi-disciplinary approach with government working closely with other sectors and other jurisdictions. A NI Climate Change Committee must work closely with both the UK Committee on Climate Change, and the Ireland Climate Change Advisory Council to enable joined-up decision-making and address issues where jurisdictions meet at border regions (this could be achieved by including a member from the other committees).

Climate NI has strong existing links with the UK Climate Change Commission (previously UK Committee on Climate Change), and climate policy-makers in ROI. It would be well placed to provide support for an NI expert committee which would link with the CCC and the Ireland Climate Change Advisory Committee.

To support the committee, departments and the assembly, NI needs a robust climate change research programme to provide the necessary evidence base to guide climate change policy-decisions. The work Climate NI does in partnership with research institutes across NI to collate research evidence for the CCC to develop CCRAs illustrates the major gaps in climate change research in NI. Other regions of the UK and Ireland have dedicated programmes to connect climate change research and policy. Climate NI recommends a new strategic NI research programme could work more closely with existing research programmes (across UK, ROI and internationally), and where necessary fund specific research to focus on local evidence gaps. As part of this programme, Climate NI would also recommend a short-term research (1 to 3 months) call down-service for government policy-makers which works as a partnership between Climate NI and academic research institutes (similar to Scotland).

Question 8. Do you have any other comments in respect of the issues raised in this discussion document?

Yes

No

Not sure / No opinion

1. Capacity of Government Departments

Climate NI recommends delivery of a training programme to enable a step-change across government. This is necessary to enable staff across all departments to understand how climate change relates to their roles, and how their decisions will affect emissions and climate resilience. This is currently under development for imminent roll-out across English Government Departments. A Climate Emergency was declared by the Executive and the response and actions should be led by the Executive. This is vital in order for Climate Change to be embedded in development and decision-making of all policies across all departments. Decision making and targets need a co-benefits approach, such as Green Growth Targets and Fuel poverty targets.

2. Capacity of Public Bodies

To help deliver the recommendations on the role of local authorities and public bodies from the CCC, Climate NI also recommends delivery of two other training programmes for

- public bodies,
- elected representatives in the NI assembly and in local government.

This is necessary to enable elected representatives and staff across public bodies to understand how climate change relates to their roles, and how their decisions will affect emissions and climate resilience. This is vital in order for Climate Change to be embedded in development and decision-making of all assembly, local government and public body policies. Decision making and targets need a co-benefits approach, such as Green Growth Targets and Fuel poverty targets.

3. Sectoral Forums for discussion of certain ‘wicked subjects’ such as SuDS adoption; bringing together government, local authorities and Civil Society.

4. Strategic plan for financing for climate action

Government could work with, and build on the work completed through the finance working group of the Belfast Climate Commission. Finance could come in part through Government but also through the private sector by demonstrating that investing in climate action can be a good investment decision whilst also providing huge benefit to society and the environment. There is a need for central pots of money which are 'slow' finance and interest free loans and linked to the private sector/credit unions/national infrastructure bank.

5. Research (including a programme of embedded researchers)

Climate NI reiterates the need for a robust evidence base to guide climate change policy-decisions. As detailed in Question 7, other regions of the UK and Ireland have dedicated programmes to connect climate change research and policy.

For example, Scotland's ClimateXChange Programme (linked with Adaptation Scotland, Climate NI Scottish equivalent) has been in place since 2011 and is currently funded approximately £2 million per year across mitigation and adaptation. The programme works with government and its agencies to:

- Respond to questions and requests for evidence,
- Identify upcoming evidence needs,
- Independently plan research and analysis to meet policy timelines, and
- Facilitate conversations and development of solutions across sectors disciplines and institutions to provide new insights for policy

In 2018-19 year they provided support to key climate policies including the Climate Change Bill, the Scottish Climate Change Adaptation Programme and the Energy Strategy. 35 research projects were developed, drawing on the experience of 20 research partners from research institutes, higher education institutions and the private sector.

Climate NI recommends a new strategic NI research programme could work more closely with existing research programmes (across UK, ROI and internationally), and where necessary fund specific research to focus on local evidence gaps. As part of this programme, Climate NI would also recommend a short-term research (1 to 3 months) call down-service for government policy-makers which works as a partnership between Climate NI and academic research institutes (similar to Scotland).

Question 9. Are there any important issues you feel have not been adequately covered at this early discussion stage?

Yes

No

Not sure / No opinion

1. Place-based Climate Action: Incentivise and support

Place-based climate action brings communities together to deliver real change on the ground to achieve more prosperous, healthy and resilient urban and rural communities with reduced green-house gas emissions. A seed-fund from government (as used in Scotland to encourage place-based adaptation across a number of regions) could enable urban and rural communities to develop a collaborative, evidence-based, climate action strategy. A second stage of the fund could provide seed support to deliver priority areas of these strategies (funding criteria would focus on priorities for carbon reduction and adaptation outcomes). Place-based climate action must also be guided by robust evidence.

The proposed Climate Action Research Programme (Question 8 above) could provide access to evidence for us across NI. The Belfast Place-Based Climate Action Network (funded by the UK Research and Innovation Programme) and associated Belfast Climate Commission is delivering an early-stage pilot of place-based action, supported by researchers. This offers a unique opportunity for NI to build on this work and the accompanying development of expertise. Climate NI, could coordinate and partner with the proposed NI Climate Action Research Programme to develop guidance for place-based climate action in NI and work with communities to develop strategic climate action plans. The NI government could provide seed funding to support the development and implementation of these plans across a number of NI regions to encourage community-led, on the ground, climate action.

2. Nature-Based Solutions

Nature-based solutions (NbS) can reduce the negative effects of climate change on people, the economy and nature, and therefore increase the resilience of our societies to climate change. Critically, NbS can provide these adaptation benefits whilst also contributing to climate change mitigation and biodiversity conservation. For example, protecting and restoring natural habitats along coasts or in river catchments can protect communities and infrastructure from flooding and erosion, whilst also enhancing biodiversity and increasing carbon storage. In urban areas, green spaces and trees can help with cooling and flood abatement, whilst storing carbon, filtering air pollution and providing recreation and health benefits for people.

The Role of Nature-based Solutions for Climate Change Adaptation in UK Policy Report (2020) ¹³ provides five key recommendations on how to ensure that NbS deliver multiple benefits, including climate change adaptation:

1. NbS for climate change adaptation should be **integrated with other policy areas**, to unlock synergies and avoid adverse effects.
 2. Policy support should explicitly recognize the need for a **landscape approach** involving a diverse portfolio of NbS across different habitats.
 3. NbS should be carefully designed and implemented through a **bottom-up and participatory approach** involving multiple stakeholders.
 4. NbS should be planned to deliver **measurable benefits for biodiversity** through enhancing the health, diversity and connectivity of ecosystems and their habitats and species.
 5. Adaptation policy should set **well-defined time-bound objectives** and build capacity to effectively monitor NbS outcomes over the long term.
3. The **Citizen Assembly UK report**¹⁴ should feed into the decision- making process and the main themes were the need for:
- improved information and education for all on climate change;
 - fairness, including across sectors, geographies, incomes and health;
 - freedom and choice for individuals and local areas;
 - and strong leadership from government.

It also stresses the assembly's support for **protecting and restoring nature**, and the **value of 'co-benefits'** to tackling climate change, such as improved health, advantages for local communities, high streets and the economy, including by the promotion of innovation in technology. It calls on policy makers to make use of the report as an "*invaluable resource*" for decision making.

¹³ https://www.naturebasedsolutionsinitiative.org/wp-content/uploads/2020/12/NbSinUKPolicy_Dec2020.pdf

¹⁴ <https://www.climateassembly.uk/recommendations/index.html>