

# CALL FOR EVIDENCE AND VIEWS ON THE CLIMATE CHANGE BILL

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## Response to Consultation

### Key points

- Enable the mitigation of the impact of climate change in Northern Ireland.
- Establish a legally binding net-zero carbon target for Northern Ireland.
- Provide for the establishment and powers of a Northern Ireland Climate Commissioner and Northern Ireland Climate Office.
- Guarantee existing environmental and climate protections.

**Date 15 July 2021**



## ABOUT NIFHA

The Northern Ireland Federation of Housing Associations, formed in 1977, is the representative body for Northern Ireland's 20 registered housing associations.

Our members are all not-for-profit organisations. Together, supported by the Department for Communities and the Housing Executive, they provide more than 50,000 social and affordable homes.

Housing associations access private finance to effectively double the number of homes they could build with government housing association grant alone.

Housing associations also deliver high quality care and support to help people stay as independent as possible. Working in partnership with other organisations, they also invest millions each year in community services and facilities.

Our sector employs more than 3,200 people and manages housing assets worth £4.2 bn.

NIFHA welcomes the opportunity to comment on the Call for evidence and views on the Climate Change Bill.

## CONTEXT

The Climate Change Bill that has recently come before the Northern Ireland (NI) Assembly sets out a framework to mitigate the effects of Climate Change in the coming years.

This includes reducing the amount of greenhouse gases released into the atmosphere and balancing the amount removed by our industries and through energy use.

The Bill proposes several mechanisms to help achieve its aims including establishment of Climate Action Plans across various sectors and regular reporting to monitor progress in terms of delivering the net-zero target.

# 1. THE POLICY OBJECTIVES

*The policy objectives of the Bill are to:*

- *Enable the mitigation of the impact of climate change in Northern Ireland.*
- *Establish a legally binding net-zero carbon target for Northern Ireland.*
- *Provide for the establishment and powers of a Northern Ireland Climate Commissioner and Northern Ireland Climate Office.*
- *Guarantee existing environmental and climate protections.*

## What are your views on the overall policy objectives?

NIFHA agrees with the policy objectives of the Bill are sound and suggest that they need to include-

### **Mitigation strategies**

- retrofitting buildings to make them more energy efficient.
- adopting renewable energy sources like solar, wind and small hydro or tidal stream generator.
- helping develop more active and sustainable transport including public (hydrogen buses), electric vehicles, and promoting cycling or walking as active transport.
- promoting more sustainable uses of land

### **Establishing net-zero carbon target for Northern Ireland.**

Northern Ireland has been the only part of the UK without its own climate legislation, though it is contributing to wider UK reduction targets. This legislation is needed to establish statutory targets, assign clear duties and responsibilities, and provide clarity about the long-term ambitions and coordinating actions to reduce greenhouse gas emissions and increase resilience. It was a commitment in the New Decade, New Approach agreement which restored the Stormont institutions.

### **Establishment and powers of a Northern Ireland Climate Commissioner and Northern Ireland Climate Office**

A strong independent body is critically important to ensure consistent policy delivery and evidence-based decision-making. To establish a new, independent Climate Change Commission that will provide expert advice and monitoring will keep successive governments on track to meeting long-term goals.

### **Guarantee existing environmental and climate protections.**

Economy-wide, multi-year targets, set well in advance, help to define a clear yet flexible path towards the long-term climate objective. Net zero means driving down carbon emissions as far as possible and using carbon storing like tree planting, peatland restoration and carbon capture technology to offset the rest.

Success will depend on buy in across Government departments: The climate change needs to be on the agenda across government departments ensuring policymaking in the relevant sectors in line with the long-term climate objectives.

1. A good legal framework does not guarantee automatic policy delivery. Climate action requires strong leadership.
2. the gap between emissions targets and policy delivery needs to close.

3. The stature and independence of the NI Climate Office has to be supported in the same way as other essential independent institutions are.

Do you think that the Bill will meet these objectives?

Yes

## 2. DECLARATION OF A CLIMATE EMERGENCY

*Clause 1 of the Bill legally declares a Climate Emergency in Northern Ireland.*

### 1. What are your views on declaring a Climate Emergency in Northern Ireland?

The Northern Ireland Assembly has declared a climate emergency and backed the creation of an independent body to protect the environment in Feb 2020.

MLAs supported the amendment from Sinn Féin and the Green Party which called on the Executive to support the climate change recommendations of the New Decade New Approach Deal. They backed the Sinn Féin/Green Party amendment by 48 votes to 27.

By declaring a climate emergency, Government is acknowledging climate change exists and that the measures taken up to this point are not enough. This decision stresses the need to develop measures to stop human-caused global warming.

Now is the time to seek improved public transport, cycling infrastructure and an energy strategy that focused on renewables.

Now is the time to make change to building standards so that new housing both private and social will meet the targets in the future?

Now is the time to look at skills and materials that will be needed to retrofit existing housing.

Thought is needed on how Northern Ireland could contribute better to UK targets for net zero carbon by 2045.

## 3. NET ZERO TARGET

### 1. What are your views on the target set out in the Bill to achieve a Net Zero carbon, climate resilient and environmentally sustainable economy by the year 2045?

It will be challenging to achieve the target set. Most housing association homes that will be occupied in 2045 have already been built and will require some sort of retrofitting to reduce their energy consumption. BRE research for NIHE indicates that it could cost an average of £12,300 per social rented home to bring an estimated stock of 82,000 poorer EPC rated homes up to an EPC band B2<sup>1</sup>.

This will be an expensive programme of work that will contribute to reducing emissions. However, the number of social houses will provide economies of scale and a large scale domestic retrofit programme, providing there are the skills and materials needed, will help both in Northern Ireland's economic recovery and reduction of energy consumption.

### 2. Do you think that the Net Zero emissions target is achievable?

Yes, providing financial support, skills and materials are available.

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<sup>1</sup> Building Research Establishment (BRE) on behalf of the Northern Ireland Housing Executive. 'Cost of carbon savings in Northern Ireland's housing stock' published 31 Mar 2021, p12  
<http://www.nihe.gov.uk/Documents/Research/Single-Downloads/Cost-of-carbon-savings-in-NI-housing.aspx>

We would like to point out that sustainability needs to start now- or we will be building housing that needs to be retrofitted. The assumed barriers relating to retrofitting to proceed at scale and pace are lack of finance, lack of policy, lack of capacity and capability in both the supply chains and skills.

### 3. Do you think that the timescale to deliver the Net Zero emissions target is achievable?

Yes, providing the skills, labour and material are available.

### 4. Do you think that the timescale outlined in the Bill to achieve Net Zero should be revised if circumstances change?

Yes, if circumstances involving Brexit, NI Protocol and Covid continue to affect the delivery and cost of materials a change in targets may be needed.

## 4. CLIMATE ACTION PLANS

### Climate Change Bill - Clause 3

Clause 3 of the Bill requires the government to produce Climate Action Plans on a 5-yearly basis to achieve the Net Zero Target.

The Climate Action Plans will:

- Have annual targets for net greenhouse gas emissions, water quality, soil quality and biodiversity
- Outline measures to achieve the target including carbon budgets and nitrogen budgets

#### 1. What are your views on this?

Climate Action Plans (CAP) are needed to achieve the overriding climate objective, the CAP will need to be a roadmap initiating a coherent set of policy actions across Government Departments.

### 2. Do you think the proposed Climate Action Plans are an effective way of delivering the Net Zero target?

Yes

## 5. OFFICE OF A CLIMATE COMMISSIONER

### Climate Change Bill - Clauses 5 and 6

Clauses 5 and 6 of the Bill provide for the establishment of an independent Office of a Climate Commissioner in Northern Ireland that will:

- Lay annual reports on progress made against the Climate Action Plans
- Make annual legislative reports on the effectiveness and appropriateness of the Bill.
- Make recommendations about how the aims of the Bill are being achieved.
- Have the power to request access to persons and documentation as required to discharge their duties.

#### 1. What are your views on the establishment of a Climate Commissioner?

The establishment of a Climate Commissioner as a role is necessary to head the independent advisory body monitoring the delivery of the NI Climate Action Plan.

## 2. What role and powers do you think the proposed Climate Commissioner should have?

The Committee on Climate Change is charged with the production of an annual progress report, under the auspice of the Commissioner. The reports detail the extent to which the government is on track to meet the carbon budgets and need to be evidence based. These reports are debated in Parliament and the government has a statutory obligation to respond to the Climate Commissioner. It will be important that the Commissioner is able to work with the different sectors developing a strong working relationship and understanding, while co-ordinating with a joined-up approach across Government departments.

## 6. SECTORAL PLANS

The Bill sets out that within the Climate Action Plans there will be specific policies and proposals in the following sectors to achieve the overall emissions target:

- energy production and supply (including for residential, public and district).
- heating and cooling purposes.
- transport (including shipping and aviation);
- infrastructure (including infrastructure for electric vehicular transport).
- business and industrial processes.
- residential and public (in relation to buildings in these sectors).
- waste management.
- land use and land-use change, including forestry; and
- agriculture

### 1. Do you agree with the proposal to have specific sectoral policies associated with the Climate Action Plans?

Yes

### 2. What impact do you think that these sectoral plans will have in terms of helping to achieve the Net Zero target?

Reaching the overall emissions target will require extensive, systematic change across all sectors, including industry. Having individual sectoral policies can monitor progress and identify areas that require more work, funding, or resources.

### 3. How do you think the above sectors might be affected by the proposals?

All sectors will be affected as they change to encompass the Climate Action Plans. Some areas such as Agriculture will find they have challenges to achieve a reduction. Especially the cow/methane production and it is a potent greenhouse gas. Mr Poots' has tabled a bill that has a less stringent target and a longer time frame than this Bill which will appeal to the Agricultural sector. Other areas will be requiring supporting infrastructure which is going to be essential for adoption of electric vehicles.

However, if adequately funded and resourced the various sectors may be able to achieve the targets.

## 7. RESPONSIBILITY ON PUBLIC BODIES

The Bill places obligations on a wide range of organisations to help achieve the emissions targets and it will influence policy across a number of public Departments. This includes introduction of a scheme to track carbon usage that will be overseen by the Department of Agriculture, Environment and Rural Affairs.

1. What are your views on the roles and responsibilities placed on public bodies as set out in the Bill? Tell us your views on the potential impact on public bodies.

Not answered

2. Do you think that there should be a lead responsible government Department for delivering the aims of the Bill?

Unsure

3. If you think there should be a lead Department, please tell us which one and why:

- Department for Agriculture, Environment and Rural Affairs
- Department for Communities
- Department for the Economy
- Department of Education
- The Executive Office
- Department of Finance
- Department for Health
- Department for Infrastructure
- Department for Justice

Not answered

Why do you think this government Department should be responsible?

Not answered

4. What are your views on the implementation of a carbon usage-tracking scheme?

Please tell us your views.

Not answered

## 8. RURAL IMPACT ASSESSMENT

1. Do you think it is important to assess the impact on rural communities of the proposals provided for in the Bill?

Unsure

2. What do you think is the best way to consider the potential rural impacts?

Please tell us how we should consider the rural impacts of the proposals.

Not answered

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