

Response ID ANON-VRJY-SF1N-3

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-17 14:23:13

Introduction

What is your name?

Name :

What is your email address?

Email address :

What is your organisation (if any)?

Organisation:

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

Yes

If No, why?

Explain:

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

Yes

If No, why?

Explain:

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

No

If Yes, why?

Explain:

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

Response ID ANON-VRJY-SF1M-2

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-26 17:20:16

Introduction

What is your name?

Name :

[REDACTED]

What is your email address?

Email address :

[REDACTED]

What is your organisation (if any)?

Organisation:

[REDACTED]

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

Yes

If No, why?

Explain:

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

Yes

If No, why?

Explain:

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

No

If Yes, why?

Explain:

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

N/A

Response ID ANON-VRJY-SF1Y-E

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-23 17:00:34

Introduction

What is your name?

Name :

[REDACTED]

What is your email address?

Email address :

[REDACTED]

What is your organisation (if any)?

Organisation:

[REDACTED]

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

No

If No, why?

Explain:

Imtac does not believe that the statutory rule for the establishment of the Just Transition Commission is accurate as it does not meet the stated aim of meeting just transition principles. These principles include ensuring that those most impacted by climate breakdown have active role in shaping the transition to net zero. The UN has established that both Disabled people (<https://www.ohchr.org/en/climate-change/impact-climate-change-rights-persons-disabilities>) and older people (<https://www.ohchr.org/en/climate-change/impact-climate-change-rights-older-persons>) are amongst those groups most impacted. Nowhere in the statutory including the proposed membership requirements of the Commission is there any indication that older and Disabled people will be involved in work of the proposed Commission. For Imtac this increases the likelihood of measures being introduced that make both older and Disabled people's lives more difficult, exacerbating existing inequalities and the ongoing disproportionate impact of climate breakdown.

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

No

If No, why?

Explain:

There is no indication of how the membership and role of the proposed Just Transition Commission will engage and involve those groups most impacted by climate breakdown including Disabled people and older people. This is contrary to the just transition principles which form the principles behind the commission. This needs to be corrected at this stage of the process and not treated as an add on at future date or worse ignored.

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

Yes

If Yes, why?

Explain:

The likelihood is a Just Commission that is not required to engage and involve all those most impacted by climate breakdown will recommend measures that impact on these groups, increasing existing inequalities and exacerbating the disproportionate impact of climate breakdown on these groups. This is not acceptable and must be addressed at this stage of the legislative process, not as an afterthought.

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

Imtac responded to the initial consultation in January 2025 -

<https://www.imtac.org.uk/comments-imtac-about-consultation-establishment-just-transition-commission>. From reading the Department's consultation report we were the only organisation of older and Disabled people that responded to the consultation. The Department therefore ignored our concerns. Meeting the requirements of just transition principles and wider statutory equality duties should not be based on which sectors shout the loudest.

Response ID ANON-VRJY-SF14-9

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-16 17:57:41

Introduction

What is your name?

Name :

[REDACTED]

What is your email address?

Email address :

[REDACTED]

What is your organisation (if any)?

Organisation:

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

Yes

If No, why?

Explain:

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

Yes

If No, why?

Explain:

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

No

If Yes, why?

Explain:

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

No. The establishment of the Commission is to be welcomed as a means of ensuring that all sectors are engaged with and involved in emissions reductions policy/proposals development to ensure that where support is needed it is considered and where required factored in.

Response ID ANON-VRJY-SF11-6

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-25 11:41:48

Introduction

What is your name?

Name :

[REDACTED]

What is your email address?

Email address :

[REDACTED]

What is your organisation (if any)?

Organisation:

[REDACTED]

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

Yes

If No, why?

Explain:

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

Yes

If No, why?

Explain:

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

No

If Yes, why?

Explain:

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

No thanks.

Response ID ANON-VRJY-SF13-8

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-26 15:33:21

Introduction

What is your name?

Name :

[REDACTED]

What is your email address?

Email address :

[REDACTED]

What is your organisation (if any)?

Organisation:

[REDACTED]

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

Yes

If No, why?

Explain:

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

Yes

If No, why?

Explain:

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

No

If Yes, why?

Explain:

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

NILGA welcome the progress which has been made towards establishment of the Just Transition Commission for Northern Ireland.

NILGA notes that the new Just Transition Commission will be independent of government, as is the case with Scotland and the Republic of Ireland's Just Transition Commissions. The importance of the "independent role" of the incoming JTC is also highlighted by the CCC in its board advice to the Department, that the goal of the JTC will be to support government in delivering net zero.

Further to this consultation exercise, NILGA welcomes the additional Commission places afforded to experts from the Energy, Transport, Green Finance, Built Environment, Rural Communities and Wildlife sectors; as well as 3 experts from across the agricultural sector.

Once established, NILGA and the local government sector look forward to working with the JTC via the proposed "Ad hoc Committees" which will inform

the JTC as it conducts its role.

Response ID ANON-VRJY-SF1P-5

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-25 23:50:15

Introduction

What is your name?

Name :

[REDACTED]

What is your email address?

Email address :

[REDACTED]

What is your organisation (if any)?

Organisation:

[REDACTED]

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

Yes

If No, why?

Explain:

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

No

If No, why?

Explain:

There is insufficient emphasis on new economics [Doughnut economics, post-growth prosperity, wellbeing economics, the economy of care, feminist economics]. The Commission risks placing too much of a focus on the symptoms and outcomes rather than on the drivers of inequality and unbalanced approaches to the climate transition.

- Inequality and economic structures as the key drivers of climate injustice [domestically and globally]
- There is insufficient emphasis on the inclusion of new communities, especially those from heavily impacted countries of Africa etc.

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

Yes

If Yes, why?

Explain:

The interpretation of the Just Transition will be severely constrained by the lack of emphasis on the participation of advocates from the political economy, wellbeing economy, development education/advocacy and faith groups sectors.

The Just Transition is only meaningful if the drivers of climate change are fully understood and addressed. The Just Transition as constructed by the SI will lean towards a technocratic and domesticated analysis.

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

Attention to budgeting and guaranteeing that the Commission will enjoy some autonomy and a sufficient budget will be vital.

Political will and attention is reflected first and foremost in the resources invested in that will to change and support agents of change. In NI there is an exceptional need for a 'challenge function' in our client system of patronage, where civil society's formal actors are - for the most part - subdued by their direct and indirect dependency on the State.

Response ID ANON-VRJY-SF1H-W

Submitted to SL1 The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026
Submitted on 2026-02-25 21:58:37

Introduction

What is your name?

Name :

[REDACTED]

What is your email address?

Email address :

[REDACTED]

What is your organisation (if any)?

Organisation:

[REDACTED]

Accuracy

Is the information provided by the Department in relation to the proposed statutory rule accurate?

Yes

If No, why?

Explain:

Completeness

Is the information provided by the Department in relation to the proposed statutory rule complete?

Yes

If No, why?

Explain:

Unintended consequences

Do you foresee any unintended or unanticipated consequences of implementing this statutory rule?

Yes

If Yes, why?

Explain:

The rule is intended to ensure measures to reduce green house gas emissions contained within the Climate Action Plan do not in themselves cause disadvantage or an increase in inequality across different sections of society and the economy. This is of course to be welcomed. Operationally, the rule has within it 11 objectives that require careful consideration, including using transition to a green economy as an opportunity to eliminate poverty and gender inequality. Objective D also requires consensus to be achieved in how measures are designed and implemented across social groups. As such, clear guidance on how to assess all objectives will be required through the role of the Commission and the analysis provided by Departments on Just Transition will need to be clearly assessed for their adequacy. The current treatment of Just Transition within the first Climate Action Plan shows that Departments find it difficult to understand and apply Just Transition to their policies. Proper analysis and accountable adjustments will require time and resource, and in particular, will need well designed targeted consultation with those groups or communities that might be affected. Our main concern, drawing from experience of the Rural Needs Act, is that Departments properly address the requirements of this rule, based on clear guidance and proper assessment that can require Departments to improve JT proposals. The Commission must be taken seriously in this regard, and additional sources of support in interpreting and applying Just Transition Objectives should be made available to help. Rural needs will, in our experience, be a good example of where additional interpretive support is needed.

Any other matters

Are there any other matters regarding the proposed statutory rule that you wish to draw to the committee's attention?

Any other matters :

There will be little awareness across much of society about Just Transition or indeed the Green Economy (our research on Just Transition is showing this to be the case among rural communities) so good communication of the purpose and significance of the rule should be a key consideration.



The Royal Society
of Ulster Architects

The Response of the Royal Society of Ulster Architects (RSUA) to the Committee for Agriculture, Environment and Rural Affairs' (AERA) public consultation on The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026

26 February 2026

RSUA's role

The Royal Society of Ulster Architects (RSUA) strives to enhance Northern Ireland's built environment for the benefit of all through the promotion of architecture. We are the professional body for chartered architects in the region. We have around 850 chartered members who provide expert services to clients across Northern Ireland and further afield, in addition to over 400 student members.

Thank you for the opportunity to respond to this consultation on The Climate Change (Just Transition Commission) Regulations (Northern Ireland) 2026.

Introduction

RSUA supports the establishment of a Just Transition Commission in Northern Ireland to help address climate change.

In this short response, RSUA highlights concerns regarding the Commission's independence, the adequacy of its accountability arrangements and the need for clearer assurance of stable, proportionate resourcing.

1. Institutional independence

We note that under the draft Statutory Rule and its accompanying documents that the Department of Agriculture, Environment and Rural Affairs (DAERA) has a central governance role in relation to the Just Transition Commission.

Under the Rule, DAERA would have the power to appoint and remove the Chair and members, determine remuneration and approve the establishment of committees. The Explanatory Memorandum and Regulatory Impact Assessment further indicate that DAERA will provide and fund the secretariat and oversee performance arrangements.

As DAERA has chosen to establish the Commission as an Advisory Non-Departmental Public Body within the Department, RSUA is concerned of a heightened risk of real or perceived conflicts of interest, especially where the Commission is tasked with scrutinising the same department that controls it. This arrangement may limit the Commission's ability to operate independently and transparently.

2. Performance and accountability

The Commission's potential lack of independence may be particularly problematic in the context of evaluating its performance and ensuring accountability, which, under the draft arrangements, are to be managed within DAERA.

The Chair's performance is assessed by the Department, which will also conduct the Post-Project Evaluation (PPE) 12 months after the Commission's establishment. The Commission must produce annual reports and lay them before the NI Assembly. However, there is no provision for an independent external evaluation mechanism.

Supposing the Commission will remain under DAERA's direct governance, it may be sensible for the Rule to stipulate more impartial oversight. This could be done, for example, through periodic review by the AERA Committee.

3. Resourcing

RSUA notes that the Commission is proposed to be funded by DAERA, with the Regulatory Impact Assessment estimating average annual costs of £341,406 over the first four years. This is intended to cover member remuneration (based on an anticipated commitment of around 15 sitting days per year), a small secretariat of three staff and general operational expenses.

While a statutory funding guarantee may not be feasible, the Rule or accompanying documents could more clearly signal an expectation of stable, multi-year resourcing to ensure that the Commission's funding remains proportionate to its wide-ranging responsibilities in providing oversight across the NI Executive.

Further engagement

If you have any queries about this consultation response, please contact Curtis Large, RSUA Policy and Public Affairs Officer, at curtis@rsua.org.uk or on +4474 4956 5367.