

Response submitted via email

climatechangediscussion@daera-ni.gov.uk



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Department of Agriculture, Environment and Rural Affairs
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Dear Sir/Madam,

Please find below our consultation response on the suggested Northern Ireland Climate Change Bill.

Consultation: Discussion Document on a Northern Ireland Climate Change Bill

EAUC – The Alliance for Sustainability Leadership in Education:

Response on behalf of our Members (United Kingdom and Ireland)

About the EAUC

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £43 billion, responsible for educating over 4.5 million students supported by over half a million staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

We believe

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

Our values

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice
- Collaboration - together we go further
- Role Model - leading by example
- Empowering - supporting and inspiring our members

EAUC's Approach to the Inquiry

We are incredibly supportive of a Climate Change Bill and believe that this is entirely necessary to make sure Northern Ireland is not only fulfilling its obligation under the Paris Climate Agreement and the 2008 Climate Change Act, but also as a nation of people that recognise the importance of this agenda and want carbon reduction measures enshrined in law to show their commitment to planet and people.

We have been in discussion with our Northern Ireland members, and we feel the below response represents the majority view.

Response to the consultation:

Q1 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)

Response:

It is the belief of the sector that the Northern Ireland Government should demonstrate leadership by setting aspirational but feasible Net Zero targets. However, given the Climate Change Committee (CCC) will soon be providing information regarding the quantification of Northern Ireland's equitable contribution to the UK Net Zero target, it makes sense to wait for this first. We would recommend that this consultation deadline is extended to make sure those inputting responses have access to this information as well before they make their suggestions.

There is a lot that can be prepared in advance though, and with the information we currently have, we would advise against both of the options set out by the Department of Agriculture, Environment and Rural Affairs. There must be a specific target date set, and this should be aspirational, and agreed by CCC as being feasible. The options set out in this consultation do not fulfil these requirements.

Instead, we support the CCC's recommendation – Northern Ireland should set their **carbon emissions** Net Zero target for 2050 (*at the latest*), and a **GHG emissions** target for 82% by 2050. This could be worded: Northern Ireland Climate Change Bill setting interim emission reduction targets and a long term target of net zero carbon emissions in Northern Ireland by 2050, and a reduction of all GHG emissions of 82% by 2050.

We would urge the Northern Ireland Assembly to seek advice from the CCC for a firm but feasible **GHG** Net Zero target to legislate on though, as it is important to have a set and specific target to provide drive and accountability on the journey to achieving the emissions reduction interim targets, and the net-zero emissions target in future.

It should be noted that there has also been member support for a Private Members Bill submitted to the Northern Ireland Assembly in October 2020. This Climate Change Bill called for Net Zero carbon emissions by 2045 and includes the establishment of a Northern Ireland Climate Office. We would encourage DAERA to explore the contents of this Bill as there is much merit.

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?

It is imperative that Northern Ireland’s carbon and GHG emissions targets are credible and evidence-based.

We believe the targets should be based on CCC advice, with aspirational interim targets that are regularly reviewed, modelled on the approach taken by Scotland. The interim targets should be those outlined by the CCC for Northern Ireland in their [Sixth Carbon Budget](#).

The targets from the CCC are:

Table 4.3 Emissions reductions for Northern Ireland in the UK Balanced Net Zero Pathway		
Time period	Reduction in all GHG emissions compared to 1990 levels	Reduction in CO ₂ emissions compared to 1990 levels
2030	48%	56%
Average over UK Sixth Carbon Budget period (2033-2037)	60%	70%
2040	69%	83%
2050	82%	Net Zero

Northern Ireland should look to set an example for policy in other parts of the UK and around the world on this agenda. With its relatively small population, it should be easier to achieve higher levels of waste reduction targets. For example, the small, but fairly geographically-confined population, can be used to test policies for issues such as the eradication of single use plastics. It might be easier to educate 1.8 million Northern Ireland people as a test of individual policy than the whole of the UK.

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

We are unclear on the flexibility that is being requested, but we would suggest the Bill follows similar wording to that [of Wales](#), which reads:

(2)The Welsh Ministers may not make regulations changing the 2050 emissions target, an interim emissions target or a carbon budget unless at least one of the following conditions is met—
(a)they are satisfied that it is appropriate to make the change as a result of significant developments in—
(i)scientific knowledge about climate change, or
(ii)EU or international law or policy relating to climate change;
(b)the change has been recommended by the advisory body;
(c)the change is in connection with provision made under section 35(1) or 37(2).

This would give sufficient scope to be flexible, without taking away from the firm legislative nature of the targets.

Do you agree that a Northern Ireland Climate Change Bill should include a duty to set limits in 5 yearly carbon budgets on the total amount of greenhouse gases that can be emitted in Northern Ireland, which is consistent with the long term targets and any interim targets set by that Bill?

Yes, an emissions cap of this nature would be in line with the rest of the UK, and is the best way to make sure Northern Ireland stays on track to meet an aspirational emissions reduction target.

Should provision for reporting on adaptation measures by 'major player' public bodies, be included in a Northern Ireland Climate Change Bill?

Yes, we believe the [Public Bodies Climate Change Duties](#) in Scotland would be the best model to base this on.

Should provision for reporting on mitigation measures by 'major player' public bodies, be included in a Northern Ireland Climate Change Bill? Who should this include?

Yes, we believe the [Public Bodies Climate Change Duties](#) in Scotland would be the best model to base this on.

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?

It is our opinion that the CCC should continue to be used as the basis for detailed expertise on Climate Change.

It would be prudent for Northern Ireland to set up similar bodies to those in Scotland (who have a [Just Transition Committee and a Climate Assembly](#)), in addition to expertise from the CCC), but this does not necessarily need to be legislated on.

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

We wanted to emphasise the role of post-16 education on the Climate Crisis agenda. Emissions reduction targets and the decarbonisation of Northern Ireland must be accompanied by education and skills. Many people in the current workforce will need to be upskilled or retrained for a low carbon world, and those in education institutions, the pipeline to the jobs market, must receive an education that equips them with the viable skills and knowledge needed to gain employment. We would urge the Northern Ireland Assembly to work closely with its universities and colleges, many of whom have expertise in these areas that would be of great benefit to the Assembly.

We also wanted to state clearly that it is important that emissions reduction goes beyond conserving the environment, and actively contributes towards sustainable development.

A final thought; there may be a role for sector-specific emissions targets, e.g. public sector. Consideration should be given as to whether public sector carbon reduction targets should be aligned with those for the country as a whole, and the role of individual public sector bodies within that. There needs to be a discussion with a wide range of public bodies on how various sectors can be enabled and encouraged to effectively play their vital role in the transition to a low carbon economy. The Higher and Further Education sectors will be a key player here.

We hope this information has been useful.

Yours sincerely,

Iain A Patton

Iain Patton, CEO, EAUC